

*Trans to Agent for Distribution*

**United States District Court**  
District of Oregon

UNITED STATES OF AMERICA

v.

**CRIMINAL COMPLAINT**

**CHELSEA DAWN GERLACH,**  
aka "Country Girl"

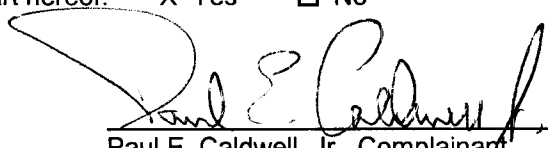
CASE NUMBER 05-2049

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 9, 1999, in Eugene, Lane County, in the District of Oregon, Defendant CHELSEA DAWN GERLACH, also known as "Country Girl", unlawfully and willfully caused and aided, abetted, counseled, commanded, induced, and procured the malicious damaging and destroying, by means of fire and an explosive, of a building and other real and personal property used in interstate commerce and used in activities affecting commerce, namely, a building and its contents located at Childers Meat Company, 29476 Airport Road, Eugene, Lane County, Oregon; in violation of Title 18 United States Code, Section(s) 844(i) and 2

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

See Affidavit attached hereto

Continued on the attached sheet and made a part hereof:  Yes  No

  
Paul E. Caldwell, Jr., Complainant

Sworn to before me and subscribed in my presence,

December 8, 2005 at Eugene, Oregon  
Date City and State

Thomas M. Coffin, U.S. Magistrate  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

## AFFIDAVIT FOR COMPLAINT

I, Paul E. Caldwell, Jr., first being duly sworn, depose and state:

I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and have so been employed for sixteen years. I am authorized as such to investigate violations of Title 18 of the United States Code, including Title 18 section 844(i), arson, relating to the destruction of property by arson. I have received training to conduct such investigations and have two years experience investigating environmental and animal rights extremist motivated violent acts, including arson.

This affidavit is submitted to support a complaint and arrest warrant charging Chelsea Dawn Gerlach, a white female, also known as "Country Girl," date of birth April 6, 1977, with the arson of the Childers Meat Company, 29476 Airport Road, Eugene, Lane County, Oregon on May 9, 1999, in violation of Title 18 section 844(i), arson.

I am currently assigned to investigate the arson of Childers Meat Company as described above. As part of my duties I have spoken with other investigators who conducted investigation in this arson. As a result, I have become aware of the following information:

I have reviewed reports prepared by Detective Robert "Bob" Holland, Eugene, Oregon Police Department, as well as discussed said investigation with Detective Holland. In this manner I learned that Holland responded to the scene of a fire at the Childers Meat Company located at 29476 Airport Road, Eugene, Oregon on May 9, 1999. Holland reported the fire occurred at approximately 2:20 AM and caused approximately \$1.2 million in property damage. A fire cause investigation by Holland and Special Agent John Comery, U.S. Bureau of Alcohol, Tobacco, and Firearms (ATF) revealed the fire was caused by two incendiary devices consisting

of four 5 gallon plastic buckets filled with gasoline, each triggered by a mechanical timing device. One device was positioned at the front entrance of the building near an alcove and the other device was placed near a rear door at a natural gas main valve.

Holland reported that the *Earth Liberation Front (ELF)* internet web site later claimed credit for the fire, calling it the "Mother's Day Fire" as it occurred on Mother's Day.


I reviewed a report written by FBI Special Agent John Ferreira in which I learned that Ferreira spoke with a confidential source (CS-1) who stated that several persons including himself/herself were involved in a conspiracy to set the arson fire at Childers Meat Company on Mother's Day, 1999, and did set the fire. The source said these persons used five gallon plastic containers and each triggered by a mechanical timing device. One incendiary device was set near the front door in a porch area and the other incendiary device was set next to a natural gas main. Among those involved in the conspiracy was a female the CS-1 knew as "Country Girl." Ferreira showed CS-1 several photographs of various persons, including several females, and CS-1 selected the photograph of Chelsea Dawn Gerlach as the woman CS-1 knew as "Country Girl" involved in the Childers Meat Company arson. CS-1 further told Ferreira that Gerlach served as a look-out at Airport Road and Highway 99 and was equipped with a hand held radio to *communicate with the other participants.*

On December 7, 2005 I was advised by SA Ferreira that a separate confidential source, known as CS-2, admitted to his/her involvement in the Mother's Day 1999 arson of Childers Meat Company. CS-2 also told SA Ferreira that Chelsea Dawn Gerlach was involved in the Childers Meat Company arson, though he/she was unable to recall the specific role Gerlach played in the arson. CS-2 also identified Chelsea Dawn Gerlach from a series of photographs of individuals shown to CS-2.

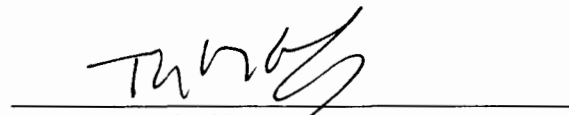
On December 8, 2005, I spoke with Tim Childers, who confirmed that Childers Meat Company does business in interstate commerce in that they ship products outside of the state and receive products from places outside of Oregon.

Based on the foregoing, and my sixteen years investigative experience, I have probable cause to believe that on May 9, 1999 at Eugene, Lane County, Oregon, in the District of Oregon, Chelsea Dawn Gerlach, aka Country Girl, committed the arson of Childer's Meat Company, 29476 Airport Road, Eugene, Lane County, Oregon, in violation of Title 18 section 844(i), arson.

I have discussed the complaint and accompanying affidavit with Assistant United States Attorney Kirk Engdall, who informed me that in his opinion the complaint and affidavit are legally and factually sufficient.

  
PAUL E. CALDWELL, JR.  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me and in my presence this 8<sup>th</sup> day of December, 2005.

  
Thomas M. Coffin  
United States Magistrate  
District of Oregon