

United States District Court

FILED 1501
U.S. DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
06 JUN 30 PM 1:55

WESTERN DISTRICT OF KENTUCKY

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

STEVEN D. GREEN

CASE NUMBER: 3:06MJ230

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 March 12, 2006 in Muhmadiyah, Iraq, defendant(s) did, (Track Statutory Language of Offense)

SEE ATTACHMENT A

in violation of Title 18, United States Code, Section(s) 7, 1111, 2241, and 3261(a)(2).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof:

Yes

No

X Steven J. Green
Signature of Complainant

Sworn to before me and subscribed in my presence,

June 30, 2006
Date

at Louisville, Kentucky

James D. Moyer, U.S. Magistrate Judge
Name & Title of Judicial Officer

James D. Moyer
Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

1. Your affiant, Gregor J. Ahlers, is a Special Agent of the Federal Bureau of Investigation (FBI). I have been a Special Agent for nineteen years. I have been assigned to Louisville Division for nine years. During that time, I have been assigned to the Violent Crime Major Offenders Squad. I have worked a variety of investigations, to include Crimes on Government Reservations (CGR), specifically those addressing the Special Territorial Jurisdiction of military reservations, and those addressing violations of Title 18, United States Code (USC), Section 3261, covering Criminal offenses committed by certain members of the Armed Forces and by persons employed by or accompanying the Armed Forces outside the United States.

2. This investigation focuses on Steven D. Green, hereafter referred to as GREEN, Date of Birth: [REDACTED] Social Security Number: [REDACTED] a former Private First Class (PFC), assigned to the 1st Platoon, Bravo (B) Company, 1/502nd Infantry Regiment, 2nd Brigade Combat Team, 101st Airborne Division (1/B/502/2/101).

3. The following information is in support of an arrest warrant for GREEN. The statements contained in this affidavit are based, in part, on information provided by Special Agents of the Criminal Investigation Division (CID), Fort Campbell, Kentucky, and on my experience and background as an Agent with the FBI. Since this affidavit is being submitted for the purposes of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that a violation of Title 18, USC, Section 3261, has been committed by GREEN.

4. On 06/27/2006, FBI Special Agent Frank Charles was contacted by agents of CID, Ft. Campbell, Kentucky, who advised receipt of a Category 1 Request For Assistance (RFA) from Camp Slayer CID (Iraq), regarding the rape and murder of an Iraqi National as well as the murder of three other Iraqi Nationals.

5. Preliminary investigation by CID in Iraq determined about 1730, 03/12/2006, three unknown Iraqi males approached Traffic Control Point 1 (TCP1), outside Mahmudiyah, Iraq and reported that a family had been killed in their house. It was originally believed that Anti-Iraqi Forces (AIF) or other entities committed the offense.

6. On/about 06/20/2006, during a combat stress debriefing, it was discovered that members of the 1/B/502/2/101, attached to the 4th Infantry Division (4ID), had killed an adult Iraqi male, a juvenile female (estimated to be five years old), and an adult female. The combat stress debriefing also revealed that the same individuals raped and killed an adult female (estimated to be twenty-five years old) at the same location.

7. The following eyewitness and non-eyewitness statements come from Sources of Information (SOI), hereafter referred to as SOI1, SOI2, and SOI3. The identities of the SOI's are known to investigators involved in this investigation. They have also been made known to the Magistrate Judge.

8. On 06/25/2006 and 06/28/2006, SOI1 was interviewed and explained that SOI2, SOI3, PFC Steven D. GREEN, and a known participant (KP1), all of 1/B/502/2/101, were conducting duties at Traffic Control Point 2 (TCP2) on 11-12 March 2006, approximately 200 meters from the residence where the crime occurred. SOI1 stated they (SOI2, SOI3, GREEN, and KP1) conspired to rape a woman, and instructed SOI1 to monitor the radio while they went to the house. Prior to departing TCP2 for the residence, SOI2 and KP1 changed clothes. SOI3

remained in his military uniform. This group took three M4 .223 caliber rifles, and one shotgun. One of the M4's belonged to SOI1. SOI2, SOI3, GREEN, and KP1 returned later with blood on their clothes, which they burned. Immediately after this, they each told SOI1 that this is never to be discussed again. SOI1 advised that the family was killed with an AK47 assault rifle that was located in the residence. SOI1 discussed this incident with SOI4, located at Camp Striker. SOI4 told SOI1 that he had heard what had happened and asked SOI1, "Who did it?" SOI1 told SOI4, "everyone who was there." SOI1 has provided, and your affiant has reviewed, his signed, sworn statement detailing the above circumstances.

9. On 06/26/2006, SOI2 was interviewed and explained that on the evening of 03/11/2006, GREEN and KP1 talked about raping the woman. The woman lived in a home behind the TCP. GREEN and KP1 had previously been to the residence. Subsequent to the conversation discussing raping the woman, SOI2, SOI3, KP1, and GREEN went to the home of the Iraqi woman that GREEN and KP1 discussed raping. SOI2 also advised that SOI2, GREEN, and KP1, drank alcohol prior to leaving for the residence. SOI2, GREEN and KP1 changed into dark clothes before leaving for the residence. SOI2 also changed clothes so he "wouldn't be seen." GREEN covered his face with a brown t-shirt.

10. Upon arriving at the residence, SOI2 stated GREEN went into the bedroom to keep the rest of the family there. KP1 threw a woman to the floor. After GREEN closed the bedroom door, SOI2 heard gunshots from inside the bedroom. GREEN came to the bedroom door and told everyone, "I just killed them, all are dead." Immediately after this, SOI2 witnessed KP1 and GREEN rape the woman that SOI3 had thrown to the floor. After the rape, SOI2 witnessed GREEN shoot the woman in the head two-to-three times. SOI2 believes that GREEN killed the three people in the bedroom with an AK47. According to SOI2, the AK47 was already in the

house when they first arrived. SOI2 has provided, and your affiant has reviewed, his signed, sworn statement detailing the above events.

11. On 06/27/2006, and again on 06/29/2006, SOI3 was interviewed. On 06/29/2006, SOI3 confessed that SOI3, GREEN, SOI2, and KP1 were drinking alcohol on 03/11/2006. SOI3 heard KP1 and someone else talking about having sex with a woman. Shortly thereafter, SOI2 and KP1 changed into black clothing. After this, SOI3, GREEN, SOI2 and KP1 departed for the residence. Once there, SOI3 witnessed GREEN placing people into a back bedroom, then close the door. SOI3 stood guard at the front door to the residence. After hearing gunshots coming from the bedroom, SOI3 asked GREEN if he was alright as GREEN exited the bedroom. According to SOI3, GREEN and KP1 proceeded to have sex with a woman. After GREEN was finished having sex with the woman, SOI3 witnessed GREEN stand up with an AK47 in his hand. GREEN walked over to the woman and shot her several times. After returning to TCP2, SOI2 instructed SOI3 to dispose of the AK47 in a canal across the street. SOI3 advised that he did what he was ordered to do. SOI3 also provided CID investigators with a floor-diagram sketch detailing the layout of the residence and the location of the bodies when they left the residence. SOI3 has provided, and your affiant has reviewed, his signed, sworn statement detailing the above events.

12. On 06/25/2006, SOI5 was interviewed. On 03/11/2006, SOI5 was at TCP 1 when an adult Iraqi National came to the TCP. The Iraqi National advised that there was a house behind TCP2 that had been burned. The Iraqi National stated there were four dead people in the residence and that one woman had been raped. After approximately one hour, and after a group of Iraqi Army personnel were sent to the residence, SOI5, SOI2 and two other soldiers drove to the residence. They observed the crime scene.

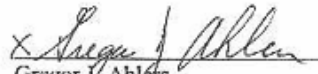
13. On 06/28/2006, your affiant received fifteen crime scene photo's provided by CID in Iraq. These photos corroborate the information provided the above referenced Sources of Information. These photo's include, but are not limited to, pictures of an Iraqi female, an Iraqi male, a young girl. All are deceased and appear to have died from gunshot wound(s). These photos also depict the burned body of what appears to be a woman with blankets thrown over her upper torso.

14. GREEN was discharged from the Army before this incident came to light. GREEN was discharged due to a personality disorder (NFI). FBI Special Agent Frank Charles has reviewed GREEN's DD Form 214, Certificate of Release or Discharge from Active Duty. This form indicates that GREEN received an Honorable discharge from the Army, after serving eleven months as an Infantryman with the 101st Airborne Division. GREEN was on active duty on 03/11/2006 and subject to Chapter 47 of Title 10 (the Uniform Code of Military Justice).

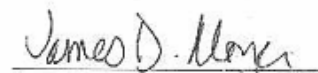
15. On 06/27/2006, CID requested FBI assistance in obtaining an arrest warrant for GREEN. CID source reporting indicates that GREEN is due at Fort Campbell, Kentucky sometime between 06/30 - 07/01 to return a rental car. GREEN is returning from Arlington, Virginia where he attended a funeral for one of the soldiers who was kidnaped and murdered by terrorists.

16. Based upon the aforementioned facts, I respectfully submit that there is probable cause to believe that Steven D GREEN has violated Title 18, USC, Section 3261, which governs criminal offenses committed within a special territorial jurisdiction, in this case, an area of combat operations in Iraq, to wit, murder (four counts) and aggravated sexual abuse.

17. In consideration to the foregoing, I respectfully request that this Court issue and arrest warrant for Steven D. Green.


Gregor W. Ahlers
Special Agent - FBI

Sworn to me and subscribed in my presence this 30th day of June 2006.


James D. Moyr
Magistrate Judge
United States District Court
Western District of Kentucky

United States District Court

WESTERN DISTRICT OF KENTUCKY

06 JUN 30 PM 1:55

UNITED STATES OF AMERICA

V.

STEVEN D. GREEN

WARRANT FOR ARREST

CASE NUMBER: 3:06MJ230

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest STEVEN D. GREEN and bring him or her forthwith to the nearest magistrate judge to answer a(n)

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition

charging him or her with (brief description of offense)

SEE ATTACHMENT A

in violation of Title 18, United States Code, Section(s) 7, 1111, 2241, and 3261(a)(2).

James D. Moyer
Name of Issuing Officer

James D. Moyer
Signature of Issuing Officer

U.S. Magistrate Judge
Title of Issuing Officer

June 30, 2006 at Louisville, Kentucky
Date and Location

Bail fixed at \$ _____ by _____
Name of Judicial Officer

RETURN		
This warrant was received and executed with the arrest of the above-named defendant at _____		
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

THE FOLLOWING IS FURNISHED FOR INFORMATION ONLY:

DEFENDANT'S NAME: Steven D. Green

ALIAS:

LAST KNOWN RESIDENCE:

LAST KNOWN EMPLOYMENT:

PLACE OF BIRTH:

DATE OF BIRTH:

SOCIAL SECURITY NUMBER:

HEIGHT: WEIGHT:

SEX: RACE:

HAIR: EYES:

SCARS, TATTOOS, OTHER DISTINGUISHING MARKS:

FBI NUMBER:

COMPLETE DESCRIPTION OF AUTO:

INVESTIGATIVE AGENCY AND ADDRESS: Federal Bureau of Investigation

ATTACHMENT A

On or about March 12, 2006, outside the United States, to wit, in Mahmudiyah, Iraq, while a member of the United States Army, subject to Chapter 47 of Title 10 (the Uniform Code of Military Justice), the defendant, Steven D. Green, did, with malice aforethought, unlawfully kill another person, an Iraqi man, by shooting, an offense punishable by more than one year if committed in the special maritime and territorial jurisdiction of the United States, all in violation of Title 18, United States Code, Sections 7, 1111, and 3261(a)(2).

On or about March 12, 2006, outside the United States, to wit, in Mahmudiyah, Iraq, while a member of the United States Army, subject to Chapter 47 of Title 10 (the Uniform Code of Military Justice), the defendant, Steven D. Green, did, with malice aforethought, unlawfully kill another person, an Iraqi woman, by shooting, an offense punishable by more than one year if committed in the special maritime and territorial jurisdiction of the United States, all in violation of Title 18, United States Code, Sections 7, 1111, and 3261(a)(2).

On or about March 12, 2006, outside the United States, to wit, in Mahmudiyah, Iraq, while a member of the United States Army, subject to Chapter 47 of Title 10 (the Uniform Code of Military Justice), the defendant, Steven D. Green, did, with malice aforethought, unlawfully kill another person, an Iraqi child, by shooting, an offense punishable by more than one year if committed in the special maritime and territorial jurisdiction of the United States, all in violation of Title 18, United States Code, Sections 7, 1111, and 3261(a)(2).

On or about March 12, 2006, outside the United States, to wit, in Mahmudiyah, Iraq, while a member of the United States Army, subject to Chapter 47 of Title 10 (the Uniform Code of Military Justice), the defendant, Steven D. Green, did, with malice aforethought, unlawfully kill another person, by shooting, in the perpetration of aggravated sexual abuse against that person, an Iraqi woman, an offense punishable by more than one year if committed in the special maritime and territorial jurisdiction of the United States, all in violation of Title 18, United States Code, Sections 7, 1111, and 3261(a)(2).

On or about March 12, 2006, outside the United States, to wit, in Mahmudiyah, Iraq, while a member of the United States Army, subject to Chapter 47 of Title 10 (the Uniform Code of Military Justice), the defendant, Steven D. Green, did knowingly cause another person to engage in a sexual act by using force against that other person, an offense punishable by more than one year if committed in the special maritime and territorial jurisdiction of the United States, all in violation of Title 18, United States Code, Sections 7, 2241, and 3261(a)(2).