

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT  
for the  
District of Colorado

United States of America )

v. )

Walter Bond )

Defendant )

Case No. 10-MJ-01120-MJW

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of \_\_\_\_\_ in the county of Denver in the \_\_\_\_\_ District of Colorado, the defendant violated 18 U. S. C. § 844 (i), an offense described as follows:

See Attachment A attached hereto and herein incorporated by reference

This criminal complaint is based on these facts:

See Affidavit attached hereto as Attachment B and herein incorporated by reference

Continued on the attached sheet.




Complainant's signature

Special Agent Revie Moore

Printed name and title

Sworn to before me and signed in my presence.

Date: July 23, 2010 at 11:05 AM 

Judge's signature

City and state: Denver, Colorado

MICHAEL J. WATANABE  
U.S. MAGISTRATE JUDGE  
DISTRICT OF COLORADO

**ATTACHMENT A**

**COUNT 1**

On or about April 30, 2010, in the State and District of Colorado, WALTER EDMUND BOND, defendant herein, did maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a building and other real and personal property used in interstate or foreign commerce.

All in violation of Title 18, United States Code, Section 844(i).

**ATTACHMENT B**

**AFFIDAVIT**

1. I, Rennie Mora, Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Department of Justice, being duly sworn, hereby state:
  
2. Your Affiant is an ATF Special Agent assigned to the Denver ATF Arson/Explosives Investigations Field Office. Your Affiant has been employed as an ATF Special Agent since September 19, 2004, and is a graduate of the Federal Law Enforcement Training Center and the ATF National Academy. Your Affiant investigates violations of federal law associated with arson and explosives crimes, including violations involving arson of property involved in interstate and foreign commerce. Your Affiant is authorized to carry firearms, execute warrants, make arrests for offenses against the United States, and to perform other duties as authorized by law.
  
3. This affidavit is made in support of a criminal complaint against Walter Edmund Bond, year of birth 1976, for violation of Title 18, United States Code Section 844(i): Arson of Property affecting Interstate Commerce. The statements set forth in this affidavit are based upon my training and experience, consultation with other experienced investigators and agents, and investigative reports and court documents. This affidavit is intended to set forth probable cause in support of the criminal complaint and does not purport to set forth all of my knowledge regarding this investigation.

4. On April 30, 2010, a fire occurred at the Sheepskin Factory located at 510 South Colorado Blvd, Glendale, Colorado. The Sheepskin Factory is a commercial retail business licensed by the City of Glendale, Colorado. The Sheepskin Factory sells a variety of Sheep skin products including but not limited to seat covers, shoes, rugs and blankets. The fire destroyed the building and its contents resulting in approximately \$500,000 in damages.
5. ATF Certified Fire Investigators, along with Denver Fire Department Investigators, examined the fire scene and determined that the fire was incendiary and had been intentionally set.
6. Investigators also reviewed video footage captured by a security camera located near the Sheepskin Factory. The video depicted an unknown individual wearing a dark colored hooded long-sleeved shirt and carrying a backpack, walking east toward the Sheepskin factory at approximately 3:15 am, shortly before the fire was reported to 911.
7. On or about April 30<sup>th</sup> 2010, your Affiant along with Glendale Police Department (GPD) Detective Marcus McElroy interviewed the owner of the Sheepskin Factory identified as Louis Ilias Livaditis (YOB: 1938). Livaditis stated the Sheepskin Factory is a commercial retail business that has been located at 510 South Colorado Blvd, Glendale, Colorado since 1986. Livaditis stated the Sheepskin Factory was not insured at the time of the fire. Livaditis indicated the Sheepskin Factory conducts most of its retail

transactions through internet based sells via the store's website at [www.sheepskinfactory.com](http://www.sheepskinfactory.com). Livaditis indicated internet sales require his staff to process and ship orders out of the state of Colorado. Therefore, the Sheepskin Factory routinely caused products to be shipped from Colorado and travel in and/or affect interstate commerce.

8. On July 1, 2010, ATF Special Agent Christopher D. Forkner received a telephone call from an individual, who hereafter will be referred to as CI-01. CI-01 stated he/she wished to provide information regarding the Sheepskin Factory fire and a fire that occurred at a leather factory in Salt Lake City, Utah. CI-01 indicated that he/she believed WALTER BOND, currently residing in Salt Lake City, Utah was responsible for the fires. CI-01 stated that within the last few days he/she had a telephone conversation with BOND. CI-01 stated he/she had not talked to BOND for approximately 12 years prior to this. CI-01 indicated he/she believed BOND called him/her from a public library telephone in Salt Lake City, Utah.
9. CI-01 stated that when he/she asked BOND what he had been up to lately, BOND told him/her to visit the web site [www.voiceofthevoiceless.org](http://www.voiceofthevoiceless.org) and scroll down to the Sheepskin Factory fire and a fire that occurred at the Leather Factory. CI-01 stated that BOND indicated "that's what he had been up to."
10. CI-01 stated he/she was also aware that BOND had set a fire in Mason City, Iowa, in 1997, BOND set a house on fire and was later arrested and

convicted of arson and served time in prison. CI-01 stated he/she saw the reports of the fires described by BOND and didn't want any firefighters getting hurt or killed in another fire and called ATF.

11. Your Affiant reviewed the content of the web site

[www.voiceofthevoiceless.org](http://www.voiceofthevoiceless.org), and noted it is the proclaimed "Journal of the Animal Liberation Movement." Your Affiant also noted the site contained the following text, "The arson at the Sheepskin Factory in Denver was done in defense and retaliation for all the innocent animals that have died cruelly at the hands of human oppressors. Be warned that making a living from the use and abuse of animals will not be tolerated. Also be warned that leather is every bit as evil as fur. As demonstrated in my recent arson against the Leather Factory in Salt Lake City. Go vegan! ALF Lone Wolf."

12. On July 1, 2010, your Affiant reviewed a CCIC/NCIC criminal history in the name of Walter Edmund BOND (YOB: 1976) which indicated that on or about December 22, 1997, in Mason City District Court Case Number FECR005009, BOND pleaded guilty to Arson II, a class two felony in the State of Iowa. Your affiant noted that these facts are consistent with the information the caller provided regarding BOND.

13. On July 15, 2010, your Affiant reviewed photographs of BOND sent by CI-01 to Glendale Police Department. Your Affiant noted that BOND has a prominent tattoo on his neck just below his chin that reads, "VEGAN."

Your Affiant noted that the internet posting depicted on the web site

[www.voiceofthevoiceless.org](http://www.voiceofthevoiceless.org) stated, “Go Vegan.”

14. Your Affiant has reviewed official reports and spoke with investigators concerning a fire that occurred on June 5, 2010 at the Leather Factory in Salt Lake City, Utah. Your Affiant learned that investigators determined the fire to be an intentionally set incendiary fire and ruled to be arson.
15. Your Affiant spoke with investigators concerning a fire that occurred on July 3, 2010 at the Tiburon Restaurant in Sandy, Utah. The Tiburon Restaurant in Sandy, Utah serves foie gras as a menu item. Your Affiant learned that investigators determined the fire to be an intentionally set incendiary fire and ruled to be arson.
16. On July 22, 2010, at the direction of your Affiant, CI-01 met with Walter Edmund BOND at the Ramada Inn hotel located at 1150 E. Colfax Ave, Denver, Colorado 80218. The meeting was consensually monitored and audio and video tape recorded by ATF. Your affiant and other investigators monitored the conversation and heard BOND state that he burned the Sheepskin Factory in Denver as well as a leather factory and a foie gras restaurant in Utah. BOND stated that he used the nickname “Lone Wolf” and these businesses all represented animals wolves typically hunt. BOND stated that at one time he lived near the Sheepskin Factory in Glendale and that it angered him that the business profited from animals. BOND further stated that the structure was “a box of matches” and he felt that it would easily burn. BOND stated that after he set the fire he watched it burn and saw fire

trucks responding. BOND further stated that he intends to “torch” the Sheepskin Factory “in a couple of years” again since it is now reopened at another location.


17. On July 22, 2010, subsequent to the meeting between CI-01 and Bond, ATF and FBI Special Agents arrested BOND, for a violation of Title 18, USC Section 844(i). BOND was in possession of a backpack at the time of arrest. Agents searched the backpack incident to arrest and found propaganda literature titled, “The Declaration of War - Killing People to Save the Animals and the Environment - Strike a Match Light a Fuse We’ve Only Have the Earth to Lose.”
18. Based upon the aforementioned information and events, and your Affiants training and experience, your Affiant believes that probable cause exists to believe that Walter Edmund Bond, (YOB: 1976), has committed a violation of the following federal Arson laws, which substantiates the issuance of an arrest warrant:

**Title 18, USC Section 844(i)** – It shall be unlawful for any person who maliciously damages or destroys, or attempts to damage or destroy, by means of fire, any building, vehicle, or other real or personal property used in interstate or foreign commerce.


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I, Rennie Mora, being duly sworn according to law, depose and say that the facts stated in the foregoing affidavit are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Rennie Mora,  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to and subscribed before me this 23<sup>rd</sup> day of July  
2010. At 11:05 AM.

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE  
UNITED STATES DISTRICT COURT  
DISTRICT OF COLORADO

MICHAEL J. WATANABE  
U.S. MAGISTRATE JUDGE  
DISTRICT OF COLORADO

**DATE:** July 23, 2010

**DEFENDANT:** Walter Bond

**AGE:** 1976

**ADDRESS:** unknown

**OFFENSE:** **COUNT 1:** Title 18, United States Code, Section 844(i)  
Use of Fire or Explosives to Damage Property in Interstate  
Commerce.

**LOCATION OF OFFENSE:** Glendale, Colorado

**PENALTY:** **COUNT 1:**  
NLT 5 years and NMT 20 years imprisonment, NMT \$250,000.00  
fine or both; NMT 5 years supervised release; and \$100.00 Special  
Assessment

**AGENT:** Rennie Mora - Bureau of Alcohol, Tobacco, Firearms and  
Explosives

**AUTHORIZED BY:** Gregory Holloway  
Assistant U.S. Attorney

**ESTIMATED TIME OF TRIAL:**

five days or less

over five days

other

**THE GOVERNMENT**

will seek detention in this case

will not seek detention in this case

The statutory presumption of detention is applicable to this defendant.

**OCDETF CASE:**  Yes  No