

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America

v.

KEVIN KROHN

Case No. 16-6531-SELTZER

Defendant(s)

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(s) of December 22, 2016 in the county of Broward in the
Southern District of Florida, the defendant(s) violated:

Code Section

Title 18, United States Code,
Sections 871(a) and 879(a)(2)

Offense Description

Threat to take the life or inflict bodily harm upon the President-Elect

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Norman Ryan, Jr., Special Agent, USSS

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/23/2016



Judge's signature

City and state: Fort Lauderdale, Florida

Barry S. Seltzer, US Magistrate Judge

Printed name and title

AFFIDAVIT

I, Norman V. Ryan, Jr., being duly sworn, depose and state the following:

1. I am a Special Agent of the United States Secret Service ("USSS"), and I have been so employed since August, 2010. Prior to working for USSS, I was a Criminal Investigator for the Louisiana Department of Justice for three years, and an Intelligence Specialist and Intelligence Officer in the United States Navy for seven years. As a USSS Special Agent, I am responsible for investigating violations of United States law, including violations of Title 18 of the United States Code. I have received investigative training about counterfeit currency, check fraud, bank fraud, access device fraud, and identity theft, along with other aspects of federal law enforcement. I am an investigative or law enforcement officer of the United States, in that I am empowered by law to conduct investigations and to make arrests for felony offenses under the authority of Title 18, United States Code, Section 3056.

2. The information in this affidavit is based on my personal knowledge and information obtained from other law enforcement personnel and civilians. The information set forth herein is provided solely for the purpose of establishing probable cause to support the issuance of a criminal complaint charging Kevin Keith KROHN, with threats to kill or inflict bodily harm upon the President Elect of the United States, in violation of Title 18, United States Code, Sections 871(a) and 879(a)(2). Since this affidavit is submitted for the limited purpose of establishing probable cause, all of the details of the investigation of which your affiant is aware are not mentioned.

3. On or about December 22, 2016, the Palm Beach Sheriff's Office ("PBSO") advised the

USSS Protective Intelligence Agent assigned to the protective detail of the President Elect of the United States ("PEOTUS") Donald Trump of threatening statements made by a Facebook user self-identifying as Kevin Keith KROHN ("KROHN"), a United States citizen, directed at PEOTUS Trump. One statement made by the Facebook user KROHN in a thread of comments related to PEOTUS Trump's ongoing visit to Palm Beach, Florida, read:

"I'm just glad Obama didn't take all our gunz! I see a good use for one now" above an image of PEOTUS Trump which read, "He's not my president / He's an enemy of the state."

An additional comment made by Facebook user KROHN stated,

"The EXPEDITER of Trump! He will never last long!" above an image of a camouflaged man holding a scoped sniper rifle. Another Facebook user replied, "WTF does that mean?" to which Facebook user KROHN replied, "Keep yer eyes open!"

4. The information provided by the PBSO was forwarded to the USSS Protective Intelligence Operations Center ("PIOC") for additional analysis and investigation to further identify the Facebook user responsible for the threats. Analysts found a Florida resident with the same name claiming residence at 2617 Aurelia Lane, Fort Lauderdale, Broward County, Florida, which coincided with information provided by the Facebook user KROHN. Additional investigative activity revealed KROHN likely shared a residence with L.B.Z. at 8710 N.W. 10 Street, Pembroke Pines, Broward County, Florida, which coincided with Facebook posts by a user identified with the same name.

5. Officers of the Pembroke Pines Police Department ("PPPD") assisted agents of the USSS to contact KROHN at the suspected residence for further questioning regarding the threats against the PEOTUS made on the Facebook account of KROHN. Your affiant knocked on the

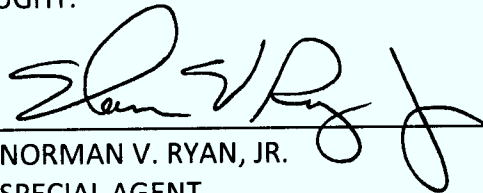
front door of the residence and announced my presence. L.B.Z. and KROHN answered the door, and your affiant recognized them from images associated with their Florida Driver and Vehicle Database information as well as self-provided Facebook images posted on their accounts. Your affiant identified myself and asked KROHN to verify his identity which he did. KROHN asked the reason for the presence of law enforcement at the residence. Your affiant asked KROHN if he was using Facebook earlier in the evening. KROHN indicated he had used Facebook. KROHN became confrontational when asked if he made the statements threatening the PEOTUS set forth previously. KROHN declared any statements he made were an expression of his First Amendment Rights. Your affiant asked KROHN if he made any threats against PEOTUS Trump, at which time he became further confrontational, began pacing in the yard, and in a loud voice said, "Well, then arrest me." After multiple failed attempts to calm KROHN, KROHN was restrained and placed in the back of a PPPD vehicle. My initial pat-down frisk of KROHN incident to his restraint revealed he possessed a retractable knife in his pocket, as well as cigarettes, a cigarette lighter, loose change, and a cellular telephone.

6. I subsequently spoke to KROHN's girlfriend, L.B.Z. L.B.Z. indicated she was asleep when your affiant knocked on the front door of the residence. However, before falling asleep, L.B.Z. observed KROHN using Facebook earlier in the evening. L.B.Z. stated she was unaware of any threats or discussions of violence towards anyone made by KROHN. L.B.Z. consented to a cursory search of the residence and directed your affiant to the computer used by KROHN. When the screen on the laptop computer was opened, one browser tab was opened to Facebook where the user was reading an article about a recent harassment incident involving

Ivanka Trump, USSS protectee and daughter of PEOTUS Trump. Pursuant to consent provided by L.B.Z., this laptop computer was seized as evidence and to conduct further analysis to search for additional evidence.

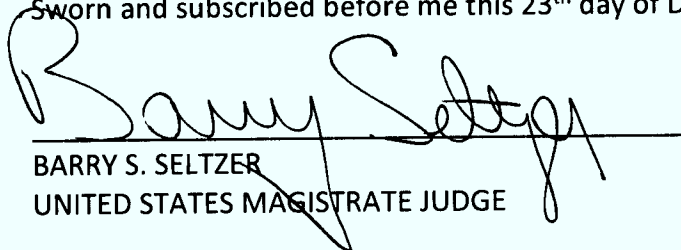
7. Based upon the foregoing, your affiant submits that there is probable cause to believe that Kevin KROHN violated Title 18, United States Code, Sections 871(a) and 879(a)(2) by threatening to take the life or inflict bodily harm upon the President-Elect of the United States.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



NORMAN V. RYAN, JR.
SPECIAL AGENT
UNITED STATES SECRET SERVICE

Sworn and subscribed before me this 23th day of December, 2016



BARRY S. SELTZER
UNITED STATES MAGISTRATE JUDGE