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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CRAIG DELEEUW ROBERTSON,

Defendant.

Case No. [REDACTED]

FELONY COMPLAINT

SEALED

COUNT 1

Violation of 18 U.S.C. § 875(c)
(Interstate Threats)

COUNT 2

Violation of 18 U.S.C. §115(a)(1)(B)
(Influencing, Impeding, and Retaliating
Against Federal Law Enforcement
Officers by Threat)

COUNT 3

Violation of 18 U.S.C. § 871(a) (Threats
Against the President)

Judge [REDACTED]

Before the Honorable [REDACTED] Magistrate Judge for
the District of Utah, appeared the undersigned, who on oath deposes and says:

COUNT 1

18 U.S.C. § 875(c)
(Interstate Threats)

On or about March 18, 2023, in the District of Utah,

CRAIG DELEEUW ROBERTSON,

defendant herein, did knowingly transmit in interstate commerce a communication containing a threat to injure the person of another, the New York County District Attorney, Alvin Bragg, to wit:

ALVIN BRAGG

Heading to New York to fulfill my dream of iradicating [sic] another of George Soros two-but political hach [sic] DAs.

I'll be waiting in the courthouse parking garage with my suppressed Smith & Wesson M&P 9mm to smoke a radical fool prosecutor that should never have been elected.

I want to stand over Bragg and put a nice hole in his forehead with my 9mm and watch him twitch as a drop of blood oozes from the hole as his life ebbs away to hell!!

BYE, BYE, TO ANOTHER CORRUPT BASTARD!!!”

all in violation of 18 § U.S.C. 875(c).

COUNT 2

18 U.S.C. § 115(a)(1)(B)
(Influencing, Impeding, Retaliating Against
Federal Law Enforcement Officers by Threat)

On or about March 24, 2023, in the District of Utah,

CRAIG DELEEUW ROBERTSON,

defendant herein, did threaten to assault and murder [REDACTED] and SA-1, both of whom are Federal law enforcement officers with the Federal Bureau of Investigation, with the intent to impede and intimidate [REDACTED] and SA-1 while they were engaged in the performance of

their official duties, and with the intent to retaliate against █████ and SA-1 on account of the performance of their official duties, in violation of 18 U.S.C. §§ 115(a)(1)(B) and 115(b)(4).

COUNT 3

18 U.S.C. § 871(a)
(Threats Against the President)

On or about August 7, 2023, in the District of Utah,

CRAIG DELEEUW ROBERTSON,

defendant herein, did knowingly and willfully make a threat to take the life of and to inflict bodily harm upon the President of the United States, to wit:

“I HEAR BIDEN IS COMING TO UTAH. DIGGING OUT MY OLD GHILLE
SUIT AND CLEANING THE DUST OFF THE M24 SNIPER RIFLE.

WELCOM, BUFFOON-IN-CHIEF!”

all in violation of 18 U.S.C. § 871(a).

ELEMENTS OF OFFENSES

The elements for a violation of 18 U.S.C. § 875(c), Interstate Threats, are:

- (1) the defendant knowingly transmitted a communication containing a threat to injure the person of another,
- (2) the defendant transmitted the communication with the intent to make a threat, or with knowledge that the communication will be viewed as a threat; and
- (3) the communication was transmitted in interstate or foreign commerce.

The elements for a violation of 18 U.S.C. § 115(a)(1)(B), Influencing, Impeding, and Retaliating Federal Law Enforcement Officers by Threat, are:

- (1) that the defendant threatened to assault, kidnap, or murder a United States

official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under 18 U.S.C. § 1114, and

- (2) the defendant did so with intent to impede, intimidate, or interfere with such official, judge, or law enforcement officer while he or she was engaged in the performance of official duties, or with the intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties.

The elements for a violation of 18 U.S.C. § 871(a), Threats Against the President, are:

- (1) the defendant knowingly and willfully made a true threat to take the life of, to kidnap, or to inflict bodily harm upon a victim; and
- (2) the victim was the President of the United States, the President-elect, the Vice President or other officer next in the order of succession to the office of President of the United States, or the Vice President-elect.

PROBABLE CAUSE

This complaint is made on the basis of investigation consisting of the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), [REDACTED]

[REDACTED]

[REDACTED] I am currently assigned [REDACTED]

[REDACTED] and primarily investigate complex

criminal organizations, such as criminal gangs and drug trafficking organizations.

During my time as a law enforcement officer, I have investigated matters involving

violent acts, to include aggravated assault, rape, and homicide, threats of violence,

extortion, kidnapping, murder-for-hire, money laundering, weapons violations, drug

trafficking, fraud, and more.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. Consequently, I am an “investigative or law enforcement officer of the United States,” within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant for CRAIG DELEEUEW ROBERTSON for violations of 18 U.S.C. § 875(c) (Interstate Threats), 18 U.S.C. § 115(a)(1)(B) (Influencing, Impeding, Retaliating Against Federal Law Enforcement Officers by Threat), and 18 U.S.C. § 871(a) (Threats Against the President), and does not set forth all of my knowledge about this matter. Information developed to date as a result of my investigation and the investigation of others revealed the following:

4. On, or about, March 19, 2023, I received a notification, which had come from the FBI National Threat Operations Center (“NTOC”), regarding a threat to life.¹ NTOC had received a tip from a social media company (“Company-1”) regarding username @winston4eagles posting a threat on Company-1’s platform to kill New York

¹ NTOC fields calls and electronic tips from the public.

County District Attorney (“DA”) Alvin Bragg. At the time of the post, DA Bragg was overseeing a criminal investigation into former President Donald J. Trump.

The following is a screenshot of the posted threat:

554.0 110046372926851134 03/18/2023 05:19 PM 10

DELETED AT 03/18/2023 05:37 PM DELETED BY By author

winston4eagles
@winston4eagles
Account Banned

Truths 204 Followers 0 Following 40

BIO
74, Air Force Vietnam Era vet, Retired welding inspector, gunsmith and woodworker. NRA Life Member, 2A Advocate and owner of many AR Rifles + many other rifles, shotguns, and handguns. As Patrick Henry said, so shall I: "GIVE ME LIBERTY OR GIVE ME DEATH."

OK Mark as not sensitive.

Sensitive Mark as sensitive.

Delete Mark as deleted.

Moderator Actions

- escalated report # 10975991 March 18, 2023 at 05:58pm
- decided delete status #110046372926851134 March 18, 2023 at 05:58pm
- decided ok status #110046372926851134 March 18, 2023 at 05:47pm

ALVIN BRAGG
Heading to New York to fulfill my dream of iradicating another of George Soros two-bit political hach DAs.
I'll be waiting in the courthouse parking garage with my suppressed Smith & Wesson M&P 9mm to smoke a radical fool prosecutor that should never have been elected.
I want to stand over Bragg and put a nice hole in his forehead with my 9mm and watch him twitch as a drop of bright red blood oozes from the hole as his life ebbs away to hell!!
BYE, BYE, TO ANOTHER CORRUPT BASTARD!!!

The screenshot shows that User @winston4eagles posted the following true threat:

“ALVIN BRAGG
Heading to New York to fulfill my dream of iradicating [sic] another of George Soros two-but political hach [sic] DAs.
I’ll be waiting in the courthouse parking garage with my suppressed Smith & Wesson M&P 9mm to smoke a radical fool prosecutor that should never have been elected.
I want to stand over Bragg and put a nice hole in his forehead with my 9mm and watch him twitch as a drop of blood oozes from the hole as his life ebbs away to hell!!
BYE, BYE, TO ANOTHER CORRUPT BASTARD!!!”

5. NTOC provided the following information for the person associated with username @winston4eagles: a telephone number, email address, and home addresses all believed to belong to Craig Deleeuw ROBERTSON (hereafter “ROBERTSON”). The email address associated with the @winston4eagles [REDACTED]

6. On March 19, 2023, I, along with another FBI Special Agent (hereafter “SA-1”), conducted physical surveillance in the vicinity of an address in Provo, Utah where the FBI believed ROBERTSON to reside (“Residence-1”). During surveillance, the following was observed:

- a. A blue Honda, parked in the driveway of Residence-1, bearing a Utah State License Plate number which, based on my review of records, matched a vehicle listed as registered to ROBERTSON at Residence-1.
- b. A heavy-set white male, approximately 70-75 years old, with gray hair, wearing a bright blue jacket, white shirt, and tie (hereafter “UM-1”), walked from the east area of the above listed residence and got into the passenger’s side front seat of the Honda.
- c. ROBERTSON, wearing a dark suit (later observed as having an AR-15 style rifle lapel pin attached), a white shirt, a red tie, and a multi-colored (possibly camouflage) hat bearing the word “TRUMP” on the front, walked from the east area of the residence, and got into the driver’s seat of the Honda. ROBERTSON drove the Honda out of the driveway and traveled a

short distance northbound into the parking lot of a church. ROBERTSON and UM-1 exited the Honda and walked into the church building.

d. After several hours, UM-1 exited the church building and walked back to Residence-1.

e. Approximately one hour later, ROBERTSON exited the church building and entered the Honda with another unknown male (hereafter "UM-2"). ROBERTSON and UM-2 drove out of the parking lot and out of sight. Several minutes later, ROBERTSON and UM-2 returned to the church parking lot in the Honda. UM-2 exited the Honda, and ROBERTSON drove to Residence-1.

7. After arriving at the residence, SA-1 and I spoke with ROBERTSON outside of the residence. The conversation began when I called out, "Mr. Robertson?" and ROBERTSON responded in the positive.

8. After advising ROBERTSON of SA-1's and my identities as Federal Law Enforcement Officers for the FBI, ROBERTSON admitted his username on Company-1 was winston4eagles. When I advised ROBERTSON that we would like to speak with him regarding a comment he had posted on Company-1's social media platform, ROBERTSON stated, "I said it was a dream!" ROBERTSON then said, "We're done here! Don't return without a warrant!"

9. A court authorized search of a social media company (“Company-2”) account registered to “Craig Robertson,” with ROBERTSON’s same email address and displaying the name “Craig D. Robertson,” showed ROBERTSON was living in Provo, Utah.

10. As part of this investigation, I have also reviewed public posts from Company-2’s social media platform made by ROBERTSON. Based on my review of those posts by ROBERTSON from that account, I know that ROBERTSON does, in fact, appear to own a sniper rifle and a ghillie suit, has made violent threats to murder public officials, and appears to possess numerous firearms (in addition to what appears to be a long-range sniper rifle). The search also yielded, in part, multiple posts regarding threats, violent acts, firearms, and the possession and use of firearms in furtherance of committing violence against government officials. The posts show ROBERTSON’s intent to kill, at a minimum, D.A. Bragg and President Joe Biden. The posts further show ROBERTSON’s intent to impede and intimidate SA-1, me, and other FBI special agents while engaged in the performance of our official duties and that ROBERTSON intended to retaliate against the FBI. The following are screenshots of the posts:²

² The posts are not in chronological order. However, the posts display a date or timeframe of when they were published.



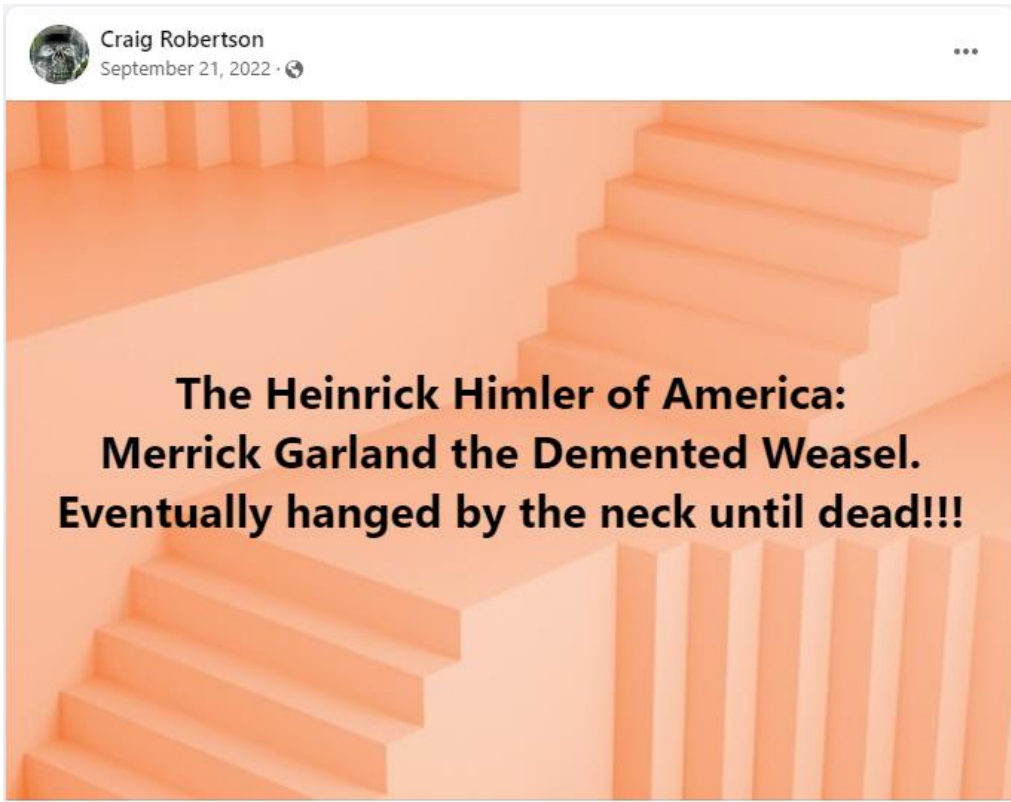
a.

I believe “JOE” refers to United States’ President Joseph Biden (POTUS) and “KAMALA” refers to United States’ Vice President Kamala Harris (VPOTUS).



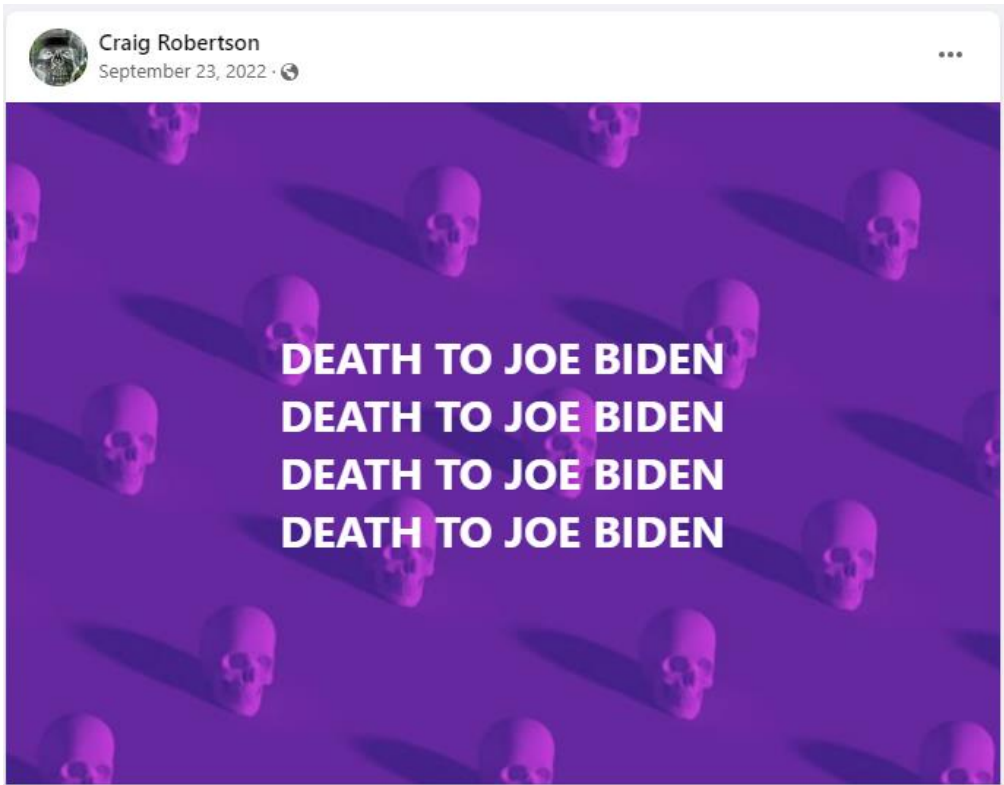
b.

I believe “LETITIA JAMES” refers to New York State Attorney General (“AG”) Letitia James and “B/TCH” to be a variation on the spelling of the word “BITCH”.



c.

I believe “Heinrick Himler” refers to the former leader of the Nazi Party Heinrich Himmler and “Merrick Garland” refers to United States AG Merrick Garland.



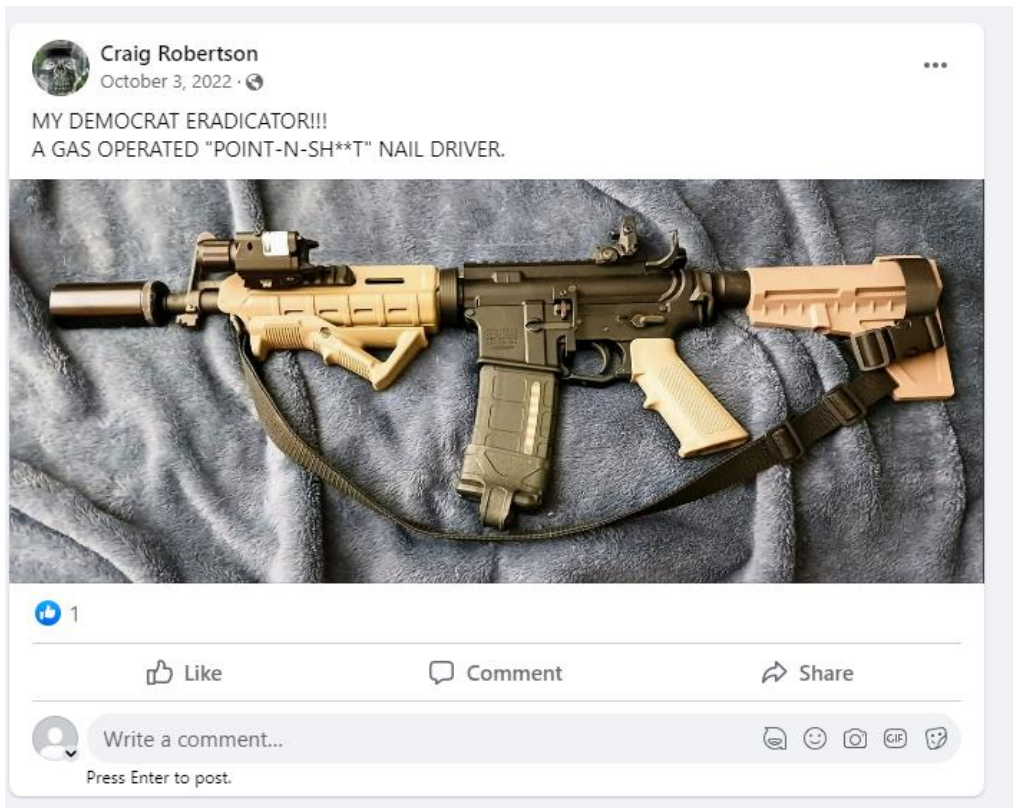
d.

I believe “JOE BIDEN” refers to POTUS and that ROBERTSON intends to bring about the death to President Biden.



e.

I believe “Merrick Garland” refers to AG Garland, “MAGA TRUMPER” refers to a supporter of former United States’ President Donald Trump, and “cowards” refers to FBI Speical Weapons and Tactics (SWAT) team members.



f.

I believe “DEMOCRAT ERADICATOR” refers to the pictured semi-automatic rifle as an instrument used to cause death to persons belonging to the Democratic Party.



g.

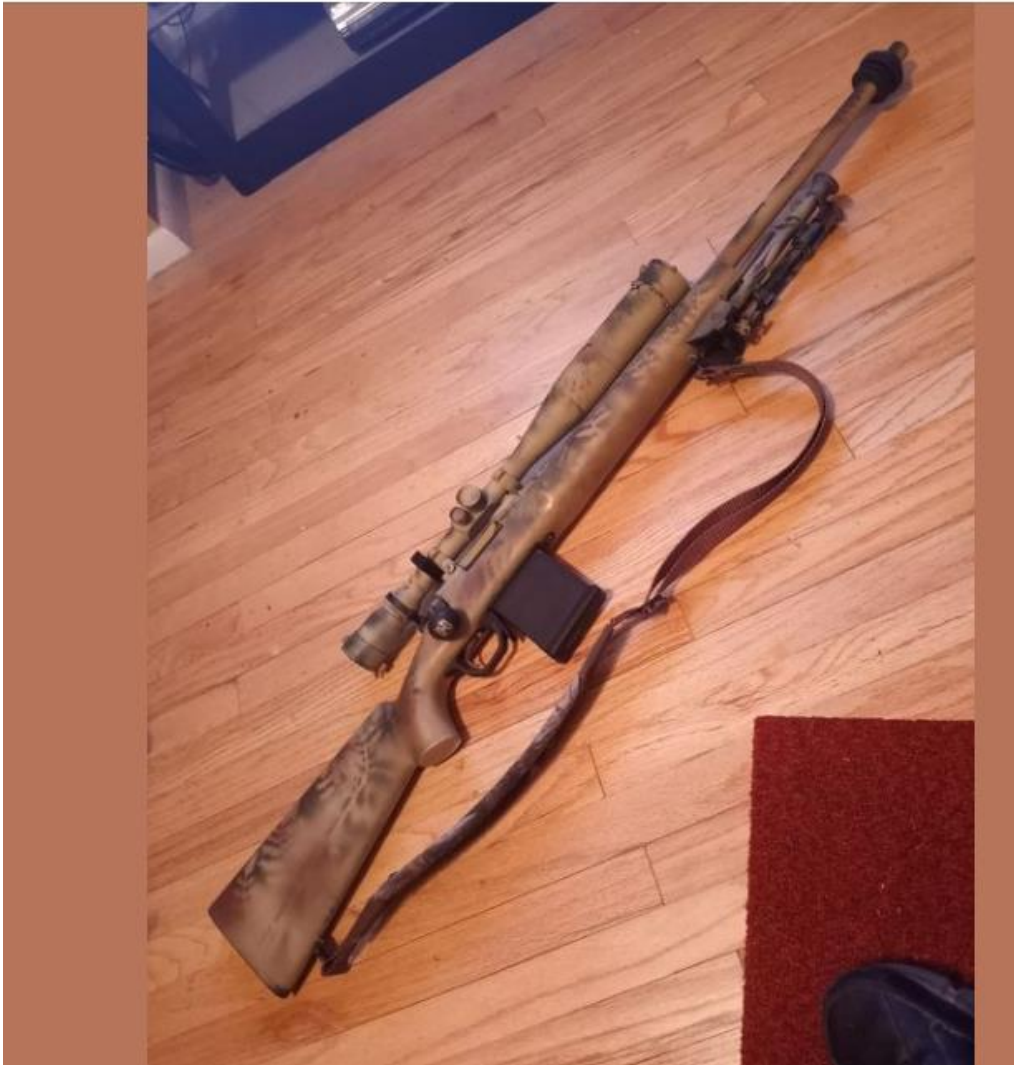
I believe “BIDEN” refers to POTUS and that ROBERTSON intends to bring about the death to President Biden..



Craig Robertson

October 4, 2022 · 🌐

LONG RANGE DEMOCRAT, HIPOCRIT ERADICATOR!!!



h.

I believe “LONG RANGE DEMOCRAT, HIPOCRIT ERADICATOR” refers to the pictured rifle as an instrument used to cause death to persons belonging to the Democratic Party.



Craig Robertson

October 11, 2022 · 🌐



Merrick Garland eradication tool.

Coming for me with your FBI, you little DEMENTED WEASEL, cowardly asshole?????



i.

I believe “Merrick Garland eradication tool” refers to the pictured semi-automatic handgun as an instrument used to cause death to AG Garland.

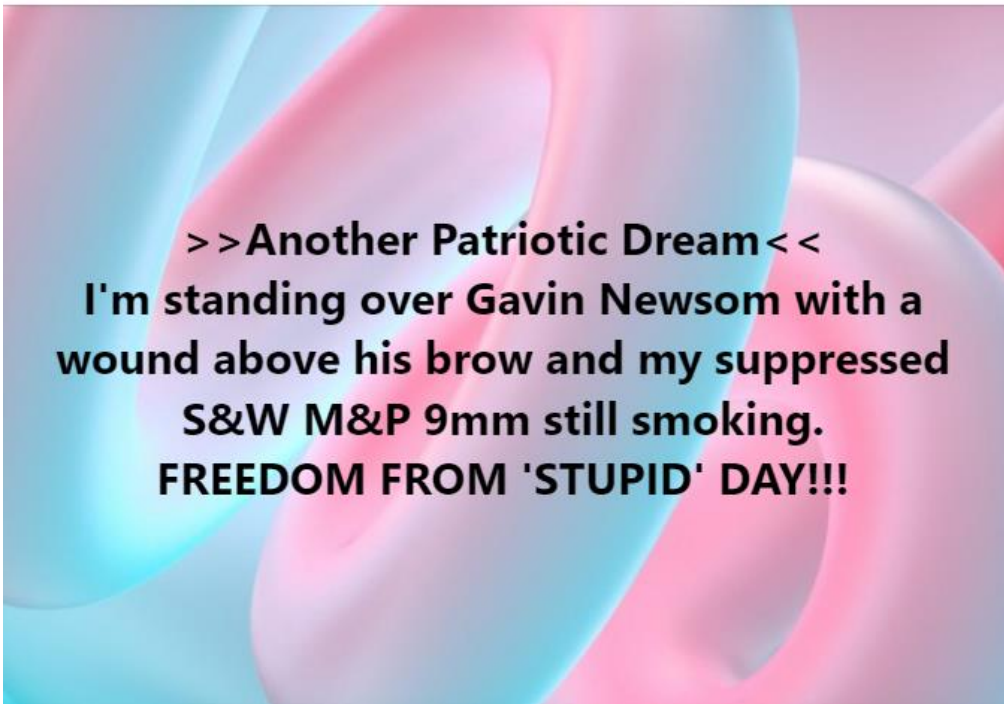


j.

I believe "Merrick Garland" refers to AG Garland and "they" refers to FBI special agents. I believe this is a threat to kill FBI Special Agents who are engaged in an investigation of ROBERTSON. This post shows ROBERTSON's intent to impede, intimidate, and retaliate against SA-1, me, and other FBI special agents.



Craig Robertson
October 17, 2022 · 🌐



k.

I believe “Gavin Newsom” refers to the Governor of California, Gavin Newsom and “wound above his brow” refers to a bullet hole in Governor Newsom’s forehead.



Craig Robertson
February 4 · 🌐



WONDERFUL DREAM!!!
I DREAMED I WAS IN A DARK CORNER OF A WASHINGTON D.C. PARKING GARAGE.
I WAS STANDING OVER THE BODY OF THE U.S. ATTORNEY GENERAL, MERRICK GARLAND, WITH A BULLET HOLE DEAD CENTER IN HIS FOREHEAD.
IN MY HAND WAS MY SUPPRESSED SMITH & WESSON M&P 9MM, SMOKE WAFING FROM THE MUZZLE.
THE STAR SPANGLED BANNER PLAYING QUIETLY IN THE DISTANCE.
I THOUGHT TO MYSELF; "WHAT AN AMAZING, PATRIOTIC MOMENT" AS SHIVERS OF LIBERTY AND FREEDOM SWELLED MY HEART FOR OUR AMAZINGLY GREAT COUNTRY.



l.

I believe this may have been the post ROBERTSON referred to when he told SA-1 and me, “I said it was a dream!”



m.

I believe “Jefferson” refers to former United States’ President Thomas Jefferson as depicted on the pictured United States’ five-cent coin, and “old Joey” refers to President Biden.



Craig Robertson

November 16, 2022 · 🌐

Just getting ready for the 2024 election cycle.
They say it's going to be a fight and I want to be ready!!!!
Only have 9, but trying for an even dozen....



n.

I believe this post refers to ROBERTSON having nine (9) semi-automatic rifles and attempting to obtain three (3) additional semi-automatic rifles in order to be ready for a “fight” during the 2024 election cycle.

Posts

Filters



Craig Robertson

11h · 🌐



Posted about a dream of Alvin Bragg, the NY DA trying to prosecute Trump. I dreamed I was standing over him and watching his life's blood oozing from a 9mm bullet hole in his head. He was still twitching. The Demented Weasel, Merrick Garland, sent his jackboot Nazi FBI to screw with me about the post. Yes, the WEAPONIZED FBI coming after a 75 year old conservative who had a dream about an a\$\$hole!!!!

👍 1

👍 Like

💬 Comment

➦ Share

0.

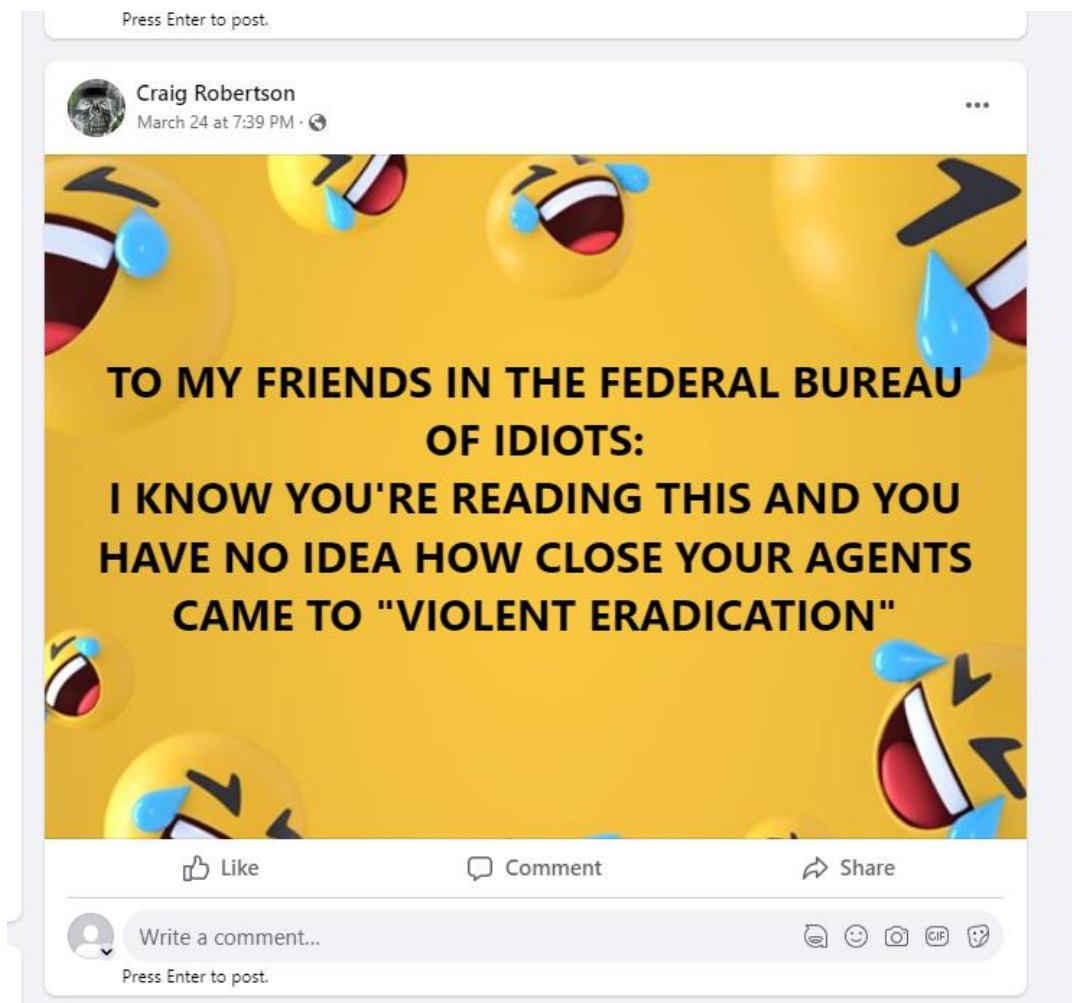
Write a comment

Because this post was posted on March 21, 2023, subsequent to SA-1 and me speaking with ROBERTSON, I believe “jackboot Nazi FBI” refers to the FBI in general and to SA-1 and me in particular.



p.

I believe "MERRICK GARLAND" refers to AG Garland.



q.

I believe this was posted on or about March 24, 2023. As such, I believe “YOUR AGENTS” refers to SA-1 and me, who spoke with ROBERTSON just five days prior on March 19, 2023, and informed him we were investigating his posting(s) on social media. I believe “VIOLENT ERADICATION” refers to ROBERSTON assaulting and murdering SA-1 and me by shooting us with a firearm. I believe he made this threat with the intent to impede, intimidate, and interfere with FBI special agents engaged in the performance of their official

duties and also had the intent to retaliate against such FBI agents on account of the performance of their official duties.



S.

I believe this was posted on March 25, 2023, as it was discovered on March 30, 2023. Additionally, I believe "YOUR AGENTS" refers to SA-1 and me who spoke with ROBERTSON on March 19, 2023, and "BANG" to be referring to being shot. Like the previous posting, I believe he made this threat with the intent to impede, intimidate, and interfere with FBI special agents engaged in the performance of their official duties and also had the intent to retaliate against such FBI agents on account of the performance of their official duties.



t.

I believe “FBI” refers SA-1 and me, “45ACP” refers to a .45 caliber handgun, and “SMOKE ‘EM’ refers to shooting SA-1 and me.



u.

I believe this was posted by ROBERTSON on Facebook on or about April 11, 2023. I believe “ALVIN” to be referring to DA Bragg and ROBERTSON intended this to be a true threat to shoot DA Bragg with firearm.



v.

I believe "ALVIN BRAGG" is DA Bragg. I believe ROBERTSON intended this to be a true threat to shoot DA Bragg with firearm.



Craig Robertson

2d · 🌐



WHEN THIS GOVERNMENT CRUMBLES UNDER ITS OWN EVIL AND CORRUPTION FOOD, WATER, ARMS, AND AMMUNITION WILL BE NECESSARY TO SURVIVE.
NINE WORDS YOU DON'T WANT TO HEAR: "WE'RE FROM THE GOVERNMENT AND WE'RE HERE TO HELP."



w. ❤️ 1

I believe this, along with other postings I have reviewed to ROBERTSON's public social media accounts, demonstrate ROBERTSON is in possession of firearms capable of inflicting death and/or bodily injury and that he intends to use these

firearms and ammunition in furtherance of committing crimes of violence as alleged above in Counts 1-3.



x.

I believe this to be a threat of death against FBI special agents if any FBI special agents arrive at ROBERTSON's residence.



y.

I believe this to be a threat of violence against President Biden.



Z.



aa.



bb.

I believe "JOE BIDEN" refers to President Biden, and "PISS" refers to urinating, and "SOBs" refers to "son of a bitch's."



cc.

The above post was published on, or about August 6, 2023. President Biden is scheduled to arrive in Utah on August 9, 2023. There have been media stories in Utah about President Biden's upcoming visit. I therefore believe this is knowing and willful true threat to kill or cause injury to President Biden using an M24 sniper rifle while being concealed by a ghillie suit during President Biden's visit to Utah.

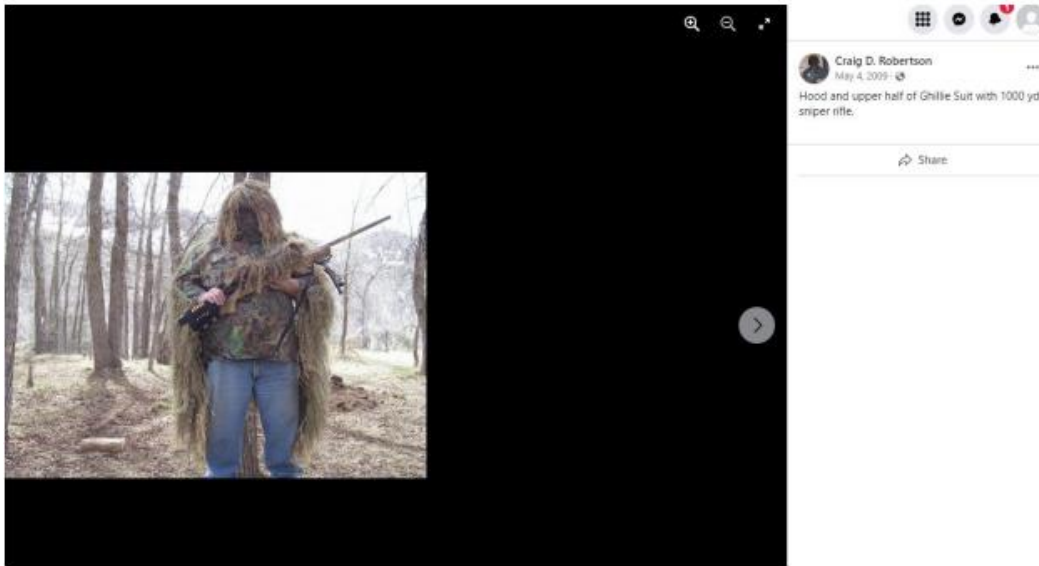
Album Hide in Plain Site - I'm just a pile of grass!



Craig D. Robertson added 14 new photos.
May 4, 2009 · 🌐



dd.

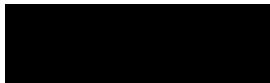


Consistent with ROBERTSON’S threat to kill President Biden above, these posts show ROBERTSON dressed in a ghillie suite demonstrating his ability to conduct sniper tactics. While these postings are somewhat dated, they nevertheless show ROBERTSON has access to a ghillie suit and a long-range rifle. Indeed, ROBERTSON confirmed in his recent threat to kill President Biden from two days ago, that he will get out his “OLD GHILLIE SUIT” and “DUST OFF” his sniper rifle, thus indicating he has been in possession of these items for some time and is still in possession of these items. I believe that ROBERTSON intends to use them to commit crimes of violence discussed in this affidavit.

11. I respectfully request that this Complaint and Affidavit, as it reveals an ongoing investigation, be sealed until further order of the Court in order to avoid premature disclosure of the investigation, guard against flight, and better ensure the safety of agents and others, except that working copies may be served on Special Agents

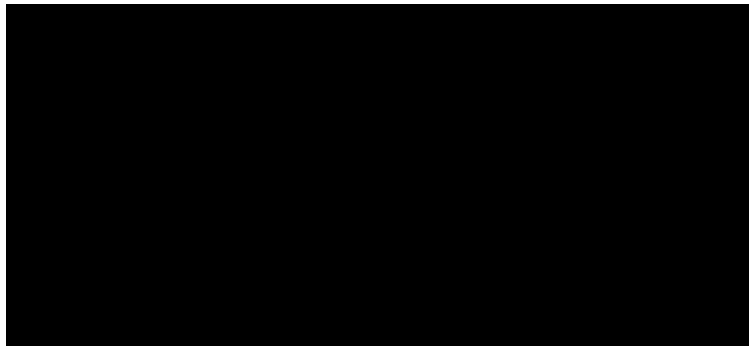
and other investigative and law enforcement officers, federally deputized state and local law enforcement officers, and other government and contract personnel acting under the supervision of such investigative or law enforcement officers as necessary to effectuate the Court's Order.

12. Based on the foregoing information, I respectfully request that a warrant of arrest be issued for CRAIG DELEEUW ROBERTSON for violations of 18 U.S.C. § 875(c), 18 U.S.C. §§115(a)(1)(B) and 115(b)(4), and 18 U.S.C. § 871(a).



Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me via video-teleconference this 8th day of August, 2023.



APPROVED:

TRINA A. HIGGINS
United States Attorney

/s/ Cameron P. Warner
Cameron P. Warner
Assistant United States Attorney