

UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

United States of America)

v.)

ADAM BIES)

Case No.)

22-mj-1108)

[UNDER SEAL])

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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 August 8, 2022 to August 12, 2022 in the county of Mercer in the Western District of Pennsylvania, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 18 U.S.C. Section 115(a)(1)(B), Influencing, Impeding or Retaliating against Federal Law Enforcement Officers

This criminal complaint is based on these facts:

Please see attached Affidavit in Support of Criminal Complaint.

Continued on the attached sheet.

/s/ Gregg Frankhouser

Complainant's signature

Gregg Frankhouser, Special Agent, FBI

Printed name and title

Sworn and subscribed before me, by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A).

Date: 08/12/2022

Handwritten signature of Maureen P. Kelly

Judge's signature

City and state: Pittsburgh, PA

Maureen P. Kelly, United States Magistrate Judge

Printed name and title

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ADAM BIES

Magistrate No. 22-1108

[UNDER SEAL]

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Gregg Frankhouser, being duly sworn, hereby depose and state the following:

I. INTRODUCTION

1. This affidavit is made in support of a criminal complaint charging ADAM BIES (“BIES”) with Influencing, Impeding or Retaliating against a Federal Law Enforcement Officer, in violation of Title 18, United States Code, Section 115(a)(1)(B).

2. I have served as a Federal Bureau of Investigation (“FBI”) Special Agent since April 2002. As a Special Agent with the FBI, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7); 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 Title 18, United States Code, Section 2516.

3. I am currently assigned to the New Castle Resident Agency in the FBI’s Pittsburgh Division. In this capacity, I am charged with investigating possible violations of federal criminal law. By virtue of my FBI employment, I perform and have performed a variety of investigative tasks, including functioning as a case agent on violent crime investigations. I have received training and have gained experience in the conduct of federal criminal investigations, the execution of federal search warrants and seizures and arrest warrants, and the identification and collection of

computer-related evidence.

4. The facts set forth in this affidavit are based on my personal knowledge, the knowledge obtained during my participation in this investigation, the knowledge obtained from other individuals, including other law enforcement personnel, review of documents and computer records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the criminal complaint, this affidavit does not set forth each and every fact that I have learned during the course of this investigation.

II. STATUTORY VIOLATIONS

5. Title 18, United States Code, Section 115(a)(1)(B), criminalizes threats to assault or murder a federal law enforcement officer with the intent to impede, intimidate, or interfere with such law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such law enforcement officer on account of the performance of official duties.

6. FBI agents are agents of the United States authorized by law to engage in or supervise the prevention, detection, investigation, or prosecution of any violation of Federal criminal law. Therefore, they are “federal law enforcement officers” for purposes of Title 18, United States Code, Section 115.

III. PROBABLE CAUSE

BIES Threats Directed to FBI and Agents

7. The allegations in this criminal complaint pertain to recent threats using electronic communication services by BIES, who resides in the Western District of Pennsylvania. While some of the actions described in this affidavit relate to very recent conduct, other actions have

occurred in the months prior to the investigation of BIES by the FBI. Most of the threats summarized below were made in the days following the FBI search of former President Donald Trump's home in Florida on August 8, 2022.

8. On or around August 11, 2022, the FBI National Threat Operations Section (NTOS) Social Media Exploitation (SMEX) team received a tip from MEMRI Domestic Terrorism Threat Monitor (DTTM) regarding Gab user "BlankFocus", who posted threats towards the FBI and law enforcement stating, "My only goal is to kill more of them before I drop." MEMRI DTTM provided additional information that the "BlankFocus" made violent threats against the FBI, "If You Work For The FBI Then You Deserve To Die".

9. On August 11, 2022, an Emergency Disclosure Request (EDR) was issued to Gab via their online Kodex Law Enforcement Portal regarding the "BlankFocus" account. On the same date, a preservation letter for the account was submitted to Gab via email. In response to the EDR, Gab provided the subscriber information regarding the user's email address, which was identified as adam@adamkennethcampbell.com. Furthermore, the following was provided in a chat log disclosed by Gab, "my email adam@adamkennethcampbell.com – I use a fake name for my photography and Gab so that corporate Murica' can't google me out of a job". Based on my background and experience, I believe BIES was using the "Adam Campbell" alias as a means of thwarting law enforcement as it related to his violent statements. Also provided by Gab were recent Internet Protocol (IP) logs including 24.144.167.194 on August 10, 2022, at 7:51pm.

10. On August 11, 2022, at 9:22pm, an EDR was submitted to Armstrong for the IP address 24.144.167.194 timestamp: 8/10/22 7:51. At approximately 9:30pm, Armstrong provided the following subscriber information related to the IP address: Adam Bies, 23 Falls Road, Mercer, PA, 16137. Open-source databases available to law enforcement confirmed BIES to be associated

with the 23 Falls Road address. The same database provided information that BIES' date of birth was October 6, 1975, which was also confirmed via Pennsylvania Driver's License information.

11. On August 11, 2022, BIES posted the following to his "BlankFocus" Gab account, "I'll shoot an SS officer in the head just as quick as I'd shoot a KGB officer in the head. Keep that in mind. There are plenty of other letters in the alphabet. Police state scum are police state scum. Period". Your affiant believes this statement compares United States Government Agencies to the Nazi SS and KGB.



Adam Kenneth Campbell @BlankFocus

1h · 🔄 · Edited



I'll shoot an SS officer in the head just as quick as I'd shoot a KGB officer in the h mind. There are plenty of other letters in the alphabet.

Police state scum are police state scum. Period.

12. In another post made on August 11, 2022, BIES tagged Gab CEO Andrew Torba, sharing his recent Gab post which states: "Here's Fox news throwing Gab under the bus because people . . . had opinions here. The examples they provided where nowhere near 'threats.'" The Fox 8 news article reported that FBI Director Christopher Wray and the agency received numerous threats on the platform. BIES wrote: "Hey asshole. Why don't you send them my threats so that they'd at least have something credible to show on Fox News. Just scrub my timeline for the posts you didn't delete after you threatened to ban me. I sincerely believe that if you work for the FBI, then you deserve to DIE." The Fox News article in question relates to FBI Director Wray "push[ing] back on threats following unprecedented raid on Trump." In this statement, BIES accepts that his statements are threats to law enforcement.



13. In another post, also on August 11, 2022, BIES wrote: "I'm ready for the inevitable. Once you accept reality for what it is instead of what you want or to be, you can move on with your life and get prepared for the inevitable outcome. I already know I'm going to die at the hands of these piece of shit child molesting law enforcement scumbags. My only goal is to kill more of them before I drop. I will not spend one second of my life in their custody." Based on my training and experience, an individual that makes statements accepting the end of life is a danger to himself and society. Based on the post described herein, I believe BIES is making his intentions known that he is willing to commit violence towards law enforcement in support of his beliefs, even if that costs him his own life.



Adam Kenneth Campbell @BlankFocus

3h · 🌐

I'm ready for the inevitable. Once you accept reality for what it is instead of what you want or to you can move on with your life and get prepared for the inevitable outcome.

I already know I'm going to die at the hands of these piece of shit child molesting law enforcem scumbags. My only goal is to kill more of them before I drop.

I will not spend one second of my life in their custody.



All the rest of you peace loving non-violent so-called republican morons will still try talking you out of it when an FBI officer has his dick inside your little girl's asshole while your wife they just : is bleeding out.

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14. In another post from August 11, 2022, BIES wrote: “It’s perfectly OK for the government to constantly tell you that they intend to murder you, but when we decide we’ve had enough and tell them we are going to slaughter THEM, you get banned from Gab. @a [Andrew Torba] go ahead and ban me you fucking asshole.” BIES added that Gab has issued him a warning: “@a just gave me an account warning today for saying that a bunch of child molesting f**gots at the FBI should be put down.”



Adam Kenneth Campbell @BlankFocus

4h · 🌐

It's perfectly OK for the government to constantly tell you that they intend to murder you, but we decide we've had enough and tell them we are going to slaughter THEM, you get banned f Gab.

@a go ahead and ban me you fucking asshole.

👍 1



👍 Like

💬 Comment

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Adam Kenneth Campbell @BlankFocus

4h · 🌐

@a just gave me an account warning today for saying that a bunch of child molesting faggots FBI should be put down.

Go ahead and ban me you piece of shit.

👍 2

15. On August 10, 2022, BIES wrote: “Every single piece of shit who works for the FBI in any capacity, from the director down to the janitor who cleans their fucking toilets deserves to die. You’ve declared war on us and now it's open season on YOU.”



Adam Kenneth Campbell @BlankFocus

1d · 🌐 · Edited



Every single piece of shit who works for the FBI in any capacity, from the director down to the who cleans their fucking toilets deserves to die.

You've declared war on us and now it's open season on YOU.

16. In another post on August 10, 2022, BIES wrote: “HEY FEDS. We the people cannot WAIT to water the trees of liberty with your blood. I’ll be waiting for you to kick down my door.”



Adam Kenneth Campbell @BlankFocus
1d · 🌐



HEY FEDS. We the people cannot WAIT to water the trees of liberty with your blood. I'll be wai
you to kick down my door.

17. On August 12, 2022, at approximately 5:00pm, BIES posted the following to his account:



Adam Kenneth Campbell @BlankFoc...
2h · 🌐 · Edited

Come and get me you piece of shit feds. I can't wait
to watch you bleed out you pedophile scumbags.

Every single one of you deserve a painful death.



Adam Kenneth Campbell @BlankFoc...
2h · 🌐

Come and get me you piece of shit feds. I am going
to fucking slaughter you.

IV. CONCLUSION

18. Based on the aforementioned information, I respectfully submit that there is probable cause to believe that ADAM BIES's threats of violence against the FBI violated Title 18, United States Code, § 115(a)(1)(B), which criminalizes threats to assault or murder a federal law enforcement officer with the intent to impede, intimidate, or interfere with such law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such law enforcement officer on account of the performace of official duties.

The above information is true and correct to the best of my knowledge, information and belief.

/s/Gregg Frankhouser
Special Agent
Federal Bureau of Investigation

The Affiant attested to this Affidavit
By telephone pursuant to FRCP 4.1(b)(2)(A)
12th day of August, 2022.


HONORABLE MAUREEN P. KELLY
United States Magistrate Judge