

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America
v.

Daniel Moreno-Gama

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Case No.

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 April 10, 2026 in the county of San Francisco in the Northern District of California, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 26 U.S.C. § 5861(d) Possession of an Unregistered Firearm and 18 U.S.C. § 844(i) Damage and Destruction of Property by Means of Explosives (Attempted)

This criminal complaint is based on these facts:

See attached affidavit of Special Agent Alexis Gabriella Villalobos, Federal Bureau of Investigation.

Continued on the attached sheet.

Approved as to form AUSA Alexis James

Complainant's signature: Special Agent Alexis Gabriella Villalobos

Sworn to before me by telephone.

Date: 4/13/2026

Judge's signature: Hon. Alex G. Tse

City and state: San Francisco, California

Hon. Alex G. Tse US Magistrate Judge

AFFIDAVIT IN SUPPORT OF APPLICATION FOR A
CRIMINAL COMPLAINT AND ARREST WARRANT

I, Alexis Gabriella Villalobos, a Special Agent of the Federal Bureau of Investigation (“FBI”), being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I make this affidavit in support of an application under Rule 4 of the Federal Rules of Criminal Procedure for an arrest warrant and criminal complaint charging Daniel Moreno-Gama (MORENO-GAMA) with violations of 18 U.S.C. § 844(i), Attempted Damage and Destruction of Property by Means of Explosives, and 26 U.S.C. § 5861(d), Possession of an Unregistered Firearm, occurring on or about April 10, 2026 in the Northern District of California.

SOURCES OF INFORMATION

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. Where statements made by other individuals (including other Special Agents and law enforcement officers) are referenced in this Affidavit, such statements are described in sum and substance and in relevant part. Similarly, where information contained in reports and other documents or records is referenced in this Affidavit, such information is also described in sum and substance and in relevant part.

3. Because this Affidavit is submitted for the limited purpose of establishing probable cause for a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary for the limited purpose of establishing probable cause for a criminal complaint and arrest warrant. The following is true to the best of my knowledge and belief.

AFFIANT BACKGROUND

4. I am a Special Agent with the FBI and have been since October 2023. I am currently assigned to FBI's San Francisco Field Division. My current assignment includes investigating individuals engaging in domestic terrorism to include violations regarding weapons of mass destruction.

5. During my career as an agent with the FBI, I have participated in investigations concerning various federal crimes, including domestic terrorism, public corruption, hate crimes, and color of law violations. I am familiar with numerous investigative techniques and practices, including, but not limited to, physical surveillance; interviewing targets, subjects, and witnesses; reviewing financial records; reviewing electronic evidence, including information in emails and on social media websites; serving and returning Federal Grand Jury subpoenas; and court-authorized interception of wire, oral, and electronic communication. I have participated in the execution of arrest and search warrants, including on residences and vehicles, as well as searches of digital devices and email accounts. Through my training and experience, I am familiar with the methods used to investigate criminal violations of federal law.

6. As an FBI agent, I am authorized to investigate violations of United States law and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States. I am an investigator and law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7). I am empowered by law to conduct investigations, to execute search warrants, and to make arrests for offenses of Federal law, including offenses enumerated in 18 U.S.C. § 844 and 26 U.S.C. § 5861.

APPLICABLE STATUTES

7. Title 18, United States Code, Section 844(i) provides “[w]hoever maliciously damages or destroys, or attempts to damage or destroy, by means of fire or an explosive, any building, vehicle, or other real or personal property used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce shall be imprisoned for not less than 5 years and not more than 20 years”

8. Title 26, United States Code, Section 5861(d) provides “[i]t shall be unlawful for any person—to receive or possess a firearm which is not registered to him in the National Firearms Registration and Transfer Record”

a. Title 26, United States Code, Section 5845(a) provides “[t]he term ‘firearm’ means . . . (8) a destructive device.”

b. Title 26, United States Code, Section 5845(f) provides “[t]he term ‘destructive device’ means (1) any explosive, incendiary, or poison gas . . . device”

STATEMENT OF PROBABLE CAUSE

9. There is probable cause to believe that MORENO-GAMA traveled from the state of Texas to California (CA) and, on or about April 10, 2026 in the Northern District of California, MORENO-GAMA threw a destructive device at two neighboring residences in San Francisco, both owned by Victim-1, and then attempted to set fire to the San Francisco-based headquarters of Company-1. Victim-1 is the Chief Executive Officer of Company-1. Company-1 is a research company that deploys and develops artificial intelligence (AI) and operates in interstate and foreign commerce.

MORENO-GAMA threw a Molotov cocktail at Victim-1’s residences

10. On or about April 10, 2026, MORENO-GAMA traveled to two neighboring residences in San Francisco, CA both owned by Victim-1 (“RESIDENCE 1” and “RESIDENCE 2,” collectively referred to as “LOCATION 1”). At approximately 3:37 a.m.,

MORENO-GAMA threw a lit Molotov cocktail-style¹ incendiary device at LOCATION 1.

The incendiary device caused a fire to the top of the driveway gate of RESIDENCE 2.

11. Video surveillance from LOCATION 1 captured MORENO-GAMA's actions.

Still images are reproduced below:



MORENO-GAMA approaching LOCATION 1 holding Molotov cocktail (above)



MORENO-GAMA throwing Molotov cocktail at LOCATION 1 (above and below)

¹ A Molotov cocktail is an incendiary device containing flammable substances typically hand-thrown at a target once the fuse is lit.



MORENO-GAMA fleeing after throwing Molotov cocktail (below)



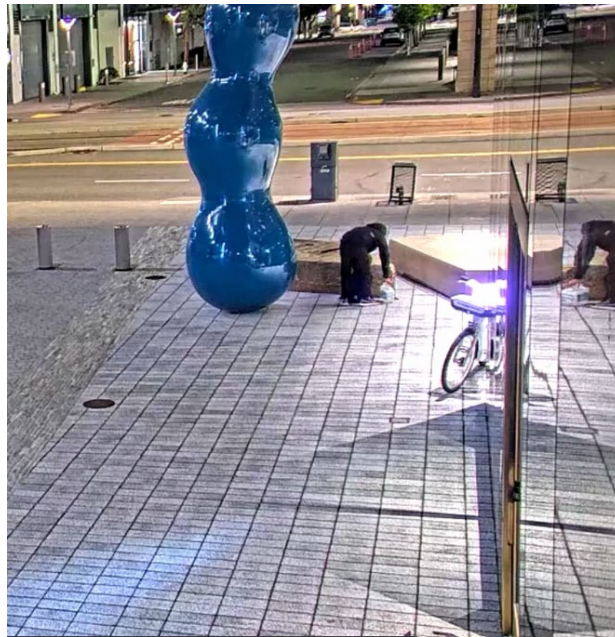
12. MORENO-GAMA then fled from LOCATION 1. No injuries were reported.

MORENO-GAMA brings incendiary devices to Company-1 Headquarters

13. On April 10, 2026, at approximately 5:00 a.m., MORENO-GAMA arrived at the headquarters of Company-1 (LOCATION 2) located on Third Street in San Francisco, CA. At LOCATION 2, MORENO-GAMA retrieved a chair and used it to strike the glass doors, and according to security personnel on site, stated in sum and substance that MORENO-GAMA came to LOCATION 2 to burn it down and kill anyone inside. San

Francisco Police Department (SFPD) Officers responded to LOCATION 2 and detained and arrested MORENO-GAMA.

14. Officers recovered incendiary devices, a jug of kerosene, a blue lighter, and a document from MORENO-GAMA's possession. Video surveillance captured MORENO-GAMA's actions at LOCATION 2. Still images are reproduced below:



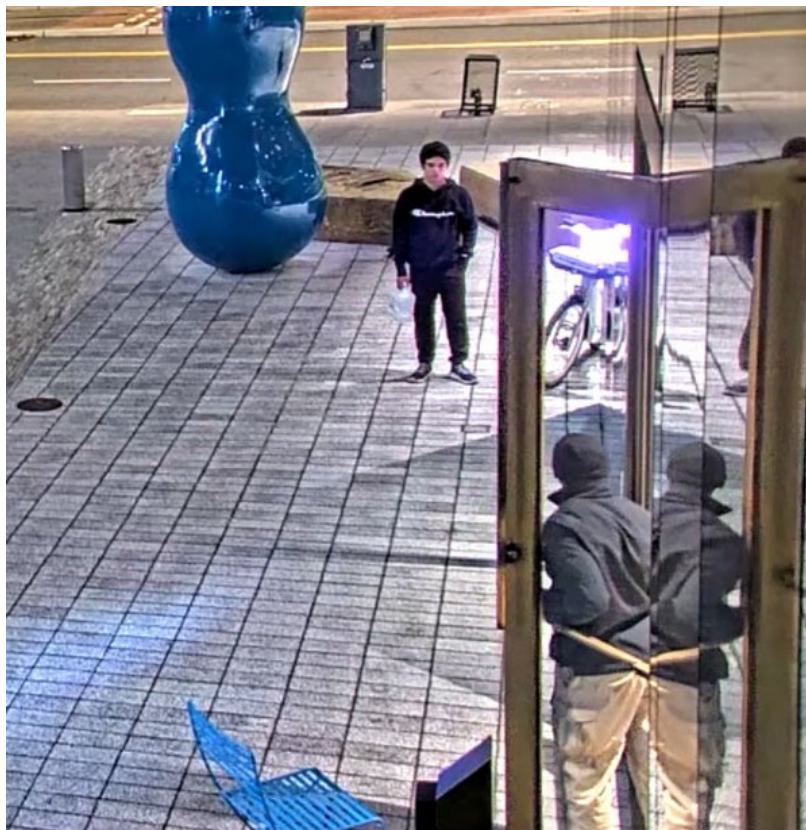
MORENO-GAMA taking out kerosene from his backpack (above)



MORENO-GAMA approaching the glass doors with a chair (above)



MORENO-GAMA striking the glass doors with a chair (above)



MORENO-GAMA being approached by security personnel while holding kerosene (above)

15. Surveillance footage of both locations confirmed that MORENO-GAMA appeared to be the offender at both LOCATION 1 and LOCATION 2:



MORENO-GAMA at LOCATION 1



MORENO-GAMA at LOCATION 2

Anti-AI document authored by MORENO-GAMA

16. As noted above, SFPD officers recovered a document from MORENO-GAMA. MORENO-GAMA appears to have sent a similar version of the document via email to individuals at his former college in Texas on April 10, 2026. The document was a three-part series that MORENO-GAMA apparently authored, which identified views opposed to Artificial Intelligence (AI) and the executives of various AI companies, including Victim-1.

17. The first part of the document was titled “Your Last Warning” followed by “Daniel Moreno-Gama.” In this part of the document, MORENO-GAMA stated he “killed /attempted to kill” Victim-1. MORENO-GAMA also wrote, “Also if I am going to advocate for others to kill and commit crimes, then I must lead by example and show that I am fully sincere in my message.” MORENO-GAMA further listed the names and addresses of apparent board members and chief executive officers of AI companies and investors.

18. The second part of the document was titled “Some more words on the matter of our impending extinction.” In this part, MORENO-GAMA discussed the purported risk AI poses to humanity.

19. The third part of the document was a letter to Victim-1 addressed as: “To [Victim-1’s name] if you make it” in which MORENO-GAMA states “If by some miracle you live, then I would take this as a sign from the divine to redeem yourself...”

No registration of firearms possessed by MORENO-GAMA

20. A representative from the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) provided confirmation that no firearms or explosives were registered to MORENO-GAMA in the National Firearms Registration and Transfer Record.

CONCLUSION

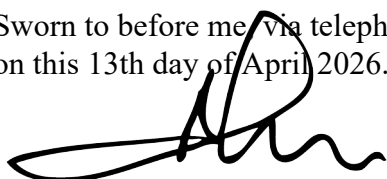
21. Based on the information above, there is probable cause to believe that on or about April 10, 2026, Daniel MORENO-GAMA violated 18 U.S.C. § 844(i), Attempted Damage and Destruction of Property by Means of Explosives, and 26 U.S.C. § 5861(d), Possession of an Unregistered Firearm, and, in the Northern District of California. Accordingly, I respectfully request that the Court issue a criminal complaint and warrant for his arrest.

I declare under penalty of perjury
that the above is true and correct to
the best of my knowledge and belief.

/s/

Alexis Villalobos
Special Agent
Federal Bureau of Investigation

Sworn to before me via telephone, and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d)
on this 13th day of April 2026.



HONORABLE ALEX G. TSE
United States Magistrate Judge