

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA

FILED UNDER SEAL

v.

Case No. 21-mj-52 HB

JASON ROBERT KARIMI,

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about January 11, 2021, in the State and District of Minnesota, defendant Jason Robert KARIMI, transmitted in interstate and foreign commerce communications containing threats to injure Victim A, in violation of Title 18, United States Code, Section 875(c).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No


Complainant's signature

Daniel Jeffreys, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: Jan. 15 2021


Judge's Signature

City and State: St. Paul, MN

Hon. Hildy Bowbeer
United States Magistrate Judge

Printed Name and Title

21-mj-52 HB

STATE OF MINNESOTA

ss.

AFFIDAVIT OF
DANIEL C. JEFFREYS

COUNTY OF RAMSEY

**AFFIDAVIT IN SUPPORT AN APPLICATION
FOR A COMPLAINT AND ARREST WARRANT**

I, Special Agent Daniel C. Jeffreys, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed for approximately 2 years. I am currently assigned to the Minneapolis Field Office and responsible for investigating violations of federal law relevant to terrorism. I have worked in the counterterrorism field for approximately 2 years and have worked specifically on threats to life, assessments of terrorism, and other extremism assessments. As a result of my experience in counter-terrorism investigations, I am familiar with the strategy, tactics, methods, tradecraft and techniques communicating threats through various mediums.

2. This affidavit is submitted in support of an application for a complaint and arrest warrant charging JASON ROBERT KARIMI with the interstate communication of a threat in violation of 18 U.S.C. § 875(c) (Threatening Communications). Based on the evidence described below, I respectfully submit that probable cause exists that KARIMI has violated 18 U.S.C § 875(c), to wit, the transmitting in interstate or foreign commerce a communication containing a threat to injure the person of another.

3. Information in this affidavit is based on my personal knowledge and on information provided to me by other counter-terrorism investigators and law enforcement officers during the course of this investigation. Because this affidavit is being submitted for the limited purpose

of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary probable cause that KARIMI has violated Title 18 U.S.C. § 875(c).

BACKGROUND OF INVESTIGATION

4. On January 11, 2021, United States Capitol Police reviewed a voicemail from telephone number recorded by caller identification as 515-509-8883, depicting the voice of an unidentified male, which had been left on the office telephone of a United States Representative, (hereafter Victim A), on January 11, 2021, at approximately 1:46 p.m. CST. The message was transmitted to the United States Capitol Police and transcribed as follows: “Hi (name redacted), I want you to be as scared as possible, terrified and shitting your pants with your child raping brother, we’re coming for ya, we’re going to fuck you up and we are going to cause you pain in every way possible you’re house being vandalized, that was quite unfortunate but it wasn’t far enough, so we’re going to end all political power you have make it so you can’t even walk in anything but a wheelchair.”

5. Records obtained via an emergency disclosure request (EDR) to Verizon returned on January 12, 2021, for cellular telephone number 515-509-8883 show the service provider of the phone to be Tracphone. GPS location data obtained from Tracphone in response to the EDR showed the phone location to be around 13XX Grand Avenue, St. Paul, Minnesota, within an area of 272 meters at approximately 1:50 a.m. on January 12, 2021.

6. Records obtained in response to an EDR to Tracphone for telephone number 515-509-8883 showed the subscriber to have a date of birth of January 3, 1989, and an email address of jahkingdomcome23@gmail.com.

7. Records obtained from an EDR to Google, Inc. for email address ahkingdomcome23@gmail showed the subscriber to be Jason Karimi, who last accessed the account on or about January 11, 2021, with a recovery/sign-in phone number as 515-509-8883. According to law enforcement records KARIMI was born on January 3, 1989.

4. On January 12, 2021, your affiant called 515-509-8883 to arrange to meet with the user of the cellphone and KARIMI answered the phone. Your affiant arranged to meet KARIMI near his current residence. Later on January 12, 2021, your affiant, another officer, and KARIMI met on the street outside of an apartment building near 13XX Grand Avenue, St. Paul, Minnesota. KARIMI agreed to be interviewed. Your affiant asked KARIMI if he knew why agents wanted to speak to him and he responded, "is it about the voicemails?" KARIMI provided background information and told your affiant that he works as an activist/lobbyist for the Marijuana industry. KARIMI said he works mostly in the state of Iowa and wishes to eventually lobby to the U.S. Government.

5. KARIMI told your affiant that he is currently in between houses and living with a friend at an apartment located at 13xx Grand Avenue, St. Paul, Minnesota. KARIMI said that he was planning to move to a home at 26XXX 465th Avenue, in Tea, South Dakota in the near future.


6. KARIMI said that he had left a voicemail message for Victim A on January 11, 2021 at Victim A's office in another state. KARIMI fully identified Victim A by name, and acknowledged that Victim A was a United States Representative. KARIMI said that immediately after the voicemail was left, he called his best friend and told the friend that, "he (KARIMI) had fucked up," and that he was afraid that the Secret Service was coming to get him. KARIMI said that the message he left in the voicemail was meant to cause "political pain" to Victim A's political career and not Victim A's "physical self." KARIMI said he uses "political threatening" to get

people's attention and illicit a response. KARIMI provided an example where he threatened a lawyer by telling him that he would "rip out his son's guts" and feed it to the son. KARIMI stated he often uses a tactic of threats to illicit a response in order to get noticed more. At the conclusion of the interview, KARIMI was advised that he was not under arrest and was free to go. KARIMI then left the meeting.

CONCLUSION

7. Based on the evidence described above, I believe probable cause exists that on or about January 11, 2021, in the District of Minnesota, JASON ROBERT KARIMI, used a cellular telephone utilizing number 515-509-8883 to violate 18 U.S.C. § 875(c), that is, transmitting in interstate or foreign commerce a communication containing a threat to injure the person of another, namely, Victim A.

Further your affiant sayeth not.


DANIEL C. JEFFREYS, Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME THIS 15th DAY OF JANUARY, 2021.


Hon. Hildy Bowbeer
United States Magistrate Judge