

UNITED STATES DISTRICT COURT **FILED**

for the
Northern District of Texas

April 3, 2025

KAREN MITCHELL
CLERK, U.S. DISTRICT
COURT

United States of America)
v.)
Robert Wilson King)
)
)
)
)
)

Case No.
3:25-MJ-324-BK

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 March 29, 2025 in the county of Kaufman in the
Northern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 875(c)	Interstate Communications

This criminal complaint is based on these facts:

See attached Affidavit of Task Force Officer Brant Doddy, Federal Bureau of Investigation

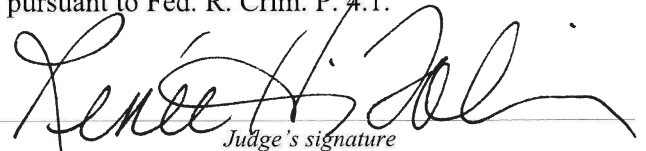
Continued on the attached sheet.


Complainant's signature

Task Force Officer Brant Doddy, FBI
Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: April 3, 2025


Judge's signature

City and state: Dallas, Texas

RENEE HARRIS TOLIVER, U.S. Magistrate Judge
Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

ROBERT WILSON KING

3:25-MJ-324-BK

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Brant L. Doddy, being first duly sworn, hereby depose and state as follows:

Introduction

1. As set forth in further detail below, there is probable cause to believe that on or about March 29, 2025, Robert Wilson King, posted a message on Facebook threatening to shoot and kill any ICE agents he sees in his neighborhood. This threat followed a string of violent social media posts by King and an admission that his rhetoric was growing more violent.

Affiant's Background

2. I am a Special Agent with the Texas Department of Public Safety and have been since January 1, 2008. I have a total of 26 years in law enforcement to include eight years as a Texas Highway Patrol State Trooper. I have experience in investigating Motorcycle and Criminal Street Gangs, Narcotics Trafficking, Cargo Theft, and Motor Vehicle Theft. For the past seven years, I have been assigned to the FBI Dallas office as a Task Force Officer to investigate domestic terrorism cases, with a focus on anti-government and anti-authority violent extremists.

3. The information contained in this affidavit is based on, among other things, my personal knowledge and observations during the course of this investigation; information conveyed to me by other agents and members of the FBI, the public, other government agencies and officials (including state and local law enforcement), and security researchers; and my review of records, documents, and other evidence obtained during this investigation. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all of my knowledge about this matter.

Applicable Law

4. Pursuant to 18 U.S.C. § 875(c), “[w]hoever transmits in interstate or foreign commerce any communication containing any threat ... any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.”

Probable Cause

5. On or about March 29, 2025, the FBI received a tip from an individual known to me (“Individual #1), that King had posted online threats towards Texas Governor Greg Abbott, U.S. Secretary of Homeland Security Kristi Noem, and agents from U.S. Immigration and Customs Enforcement (“ICE”).

6. Individual #1 reported that he confronted King about the Facebook posts, specifically King’s threat to shoot ICE agents on sight. Individual #1 reported that King confirmed not only that he had made the post, but that he was serious about his willingness to kill ICE agents, and that he had no remorse for doing so.

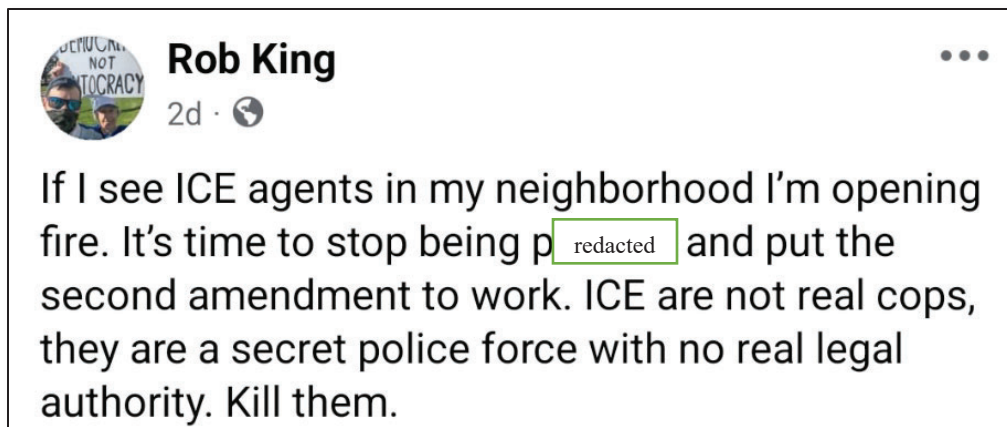
7. Individual #1 reported that King was living at a private residence in the Dallas Division of the Northern District of Texas on the date that King made the post threatening ICE agents. Individual #1 reported that King's primary communication device is an Apple iPhone 15, and that it was the only electronic device that he had seen King use. I know that Apple iPhones are not manufactured in the state of Texas and that an iPhone found in Texas has travelled in interstate commerce.

8. Individual #1 reported that after he confronted King, that King was no longer living at the private residence, that King had nowhere to live, and that King was presumably living out of his vehicle.

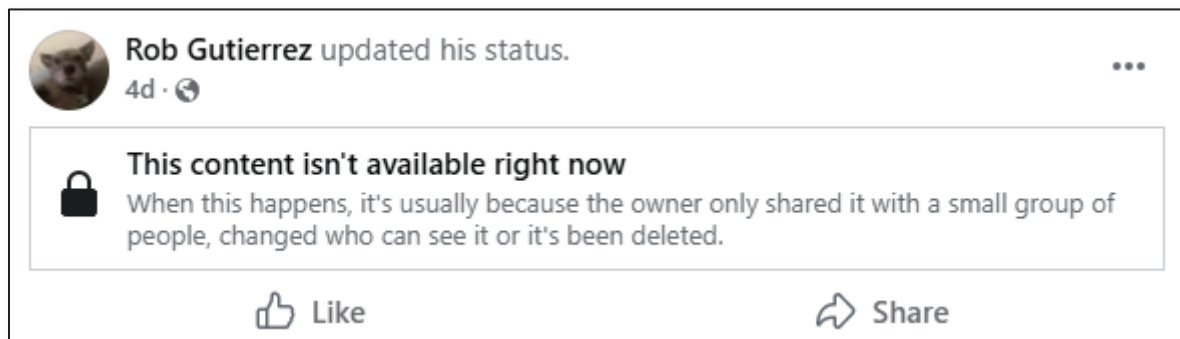
9. I have reviewed screenshots of King's public Facebook account captured by law enforcement personnel and have personally reviewed the publicly available contents of King's Facebook account. I know that Facebook is a social media site owned and operated by Meta Platforms, Inc., which is headquartered at 1 Meta Way, Menlo Park, California 94025.

10. Below, I have included a screenshot of King's Facebook post threatening ICE agents, which states, "If I see ICE agents in my neighborhood I'm opening fire. It's time to stop being p*****¹ and put the second amendment to work. ICE are not real cops, they are a secret police force with no real legal authority. Kill them."

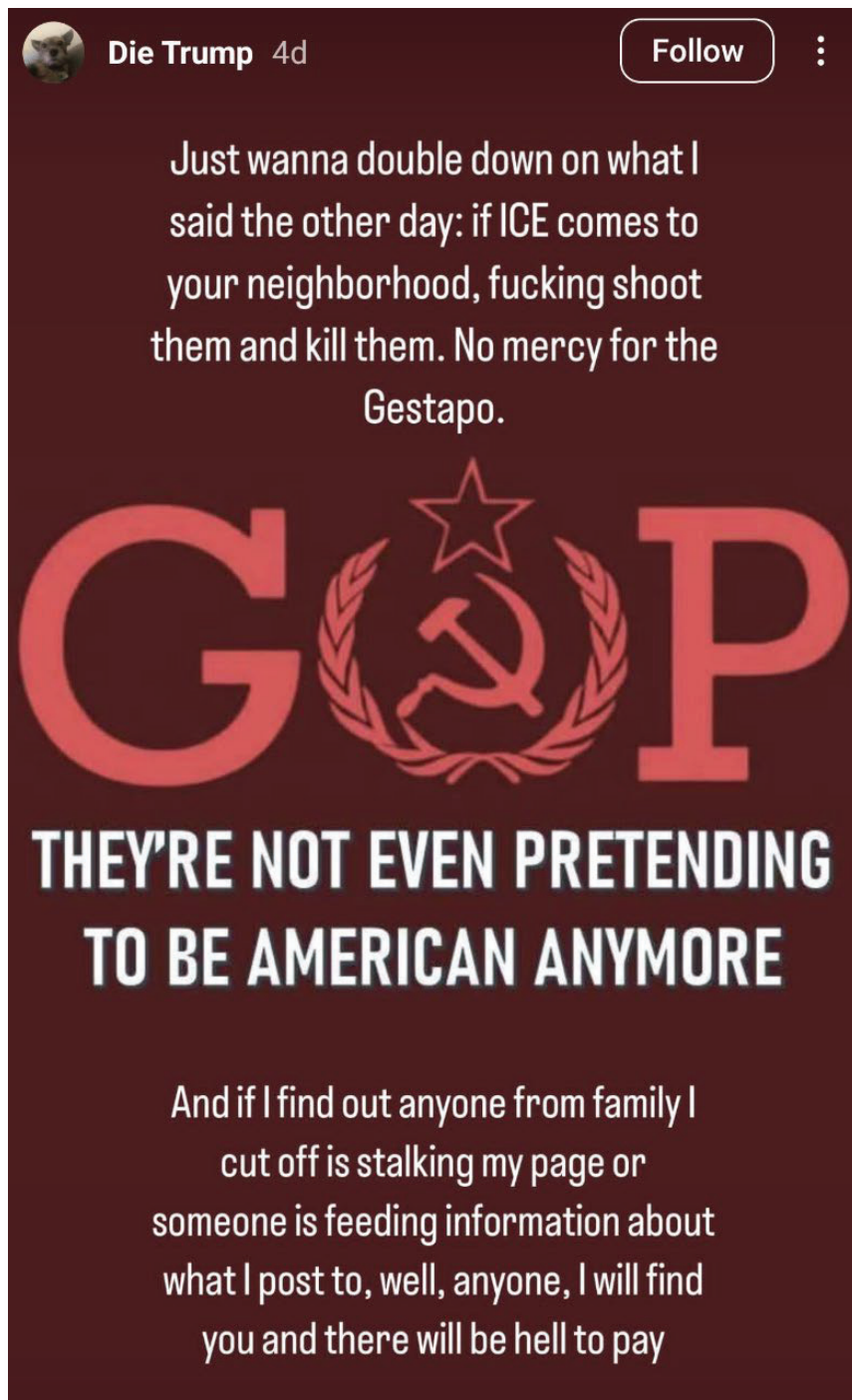
¹ The actual word used has been redacted here and in the screenshot below.



11. As demonstrated above, when this screenshot was made, King listed his name as “Rob King” in his Facebook Profile (<https://www.facebook.com/Robsaintking>). As shown in the screenshot below, as of the date of this affidavit, King’s post about opening fire and killing ICE agents has been deleted or removed from the public’s view on Facebook, and King’s profile name has been changed to “Rob Gutierrez.”



12. King’s Facebook profile has a link to an Instagram account. Below is a screenshot from a post from that Instagram account in which it appears that King “double[s] down” about shooting ICE agents, and threatens family members that “there will be hell to pay” if they are stalking his page and feeding information about his posts to anyone, including, presumably law enforcement:




13. On or about April 2, 2025, King was arrested pursuant to a warrant issued by a Kaufman County Justice of the Peace for Terroristic Threat, in violation of Texas Penal Code 22.07, a third-degree felony.


14. King is currently being held in the Kaufman County Sheriff's Office – Detention Facility and his bond has been set at \$7,500.

15. King's Facebook account also contains posts desiring violence against Governor Abbott and Secretary Noem.





 **Rob Gutierrez**
March 26 at 10:52 PM · 🌐

I truly hope, and I mean this with all my heart, that Kristi Noem meets a horrible and agonizing demise. I hope she is tried in a war criminal court with the rest of the Nazis when this is all over and I hope she is ripped apart in a gulag. Nothing less for Nazi scum. This is America now. A Nazi fascist state. Disgusting.



 **PBS NewsHour** ✓
March 26 at 7:26 PM · 🌐

U.S. Homeland Security Secretary Kristi Noem on Wednesday visited the high-security El Salvador prison where Venezuelans who the Trump administration alleges are gang members have been held since their removal from the United States. <https://to.pbs.org/4iLFFe7>

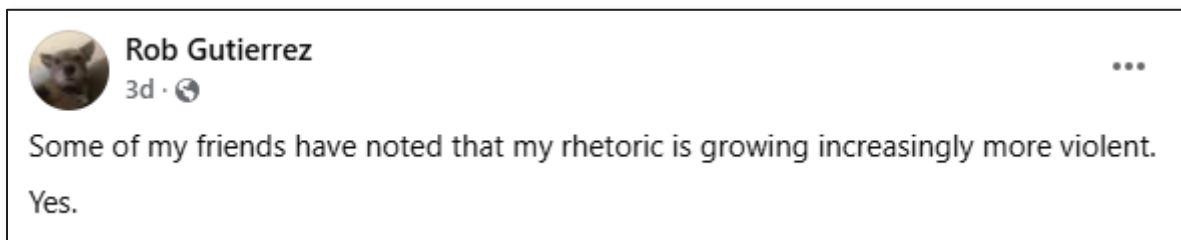
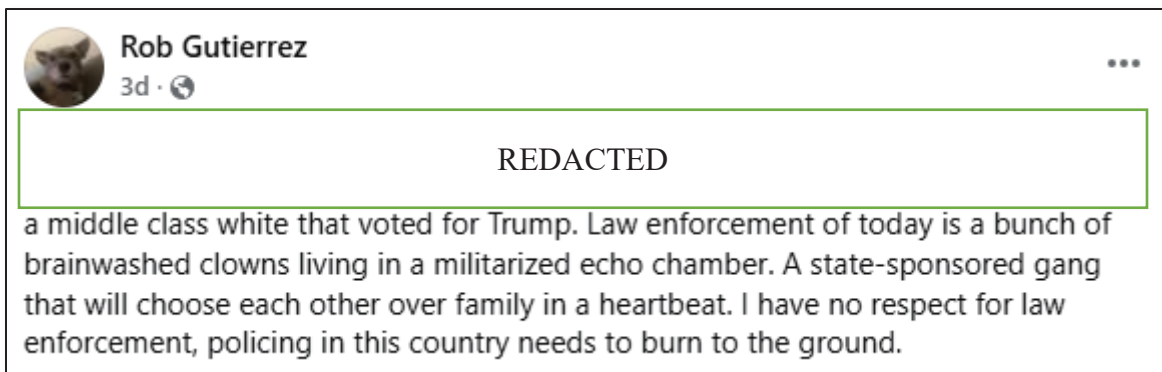


PBS.ORG 

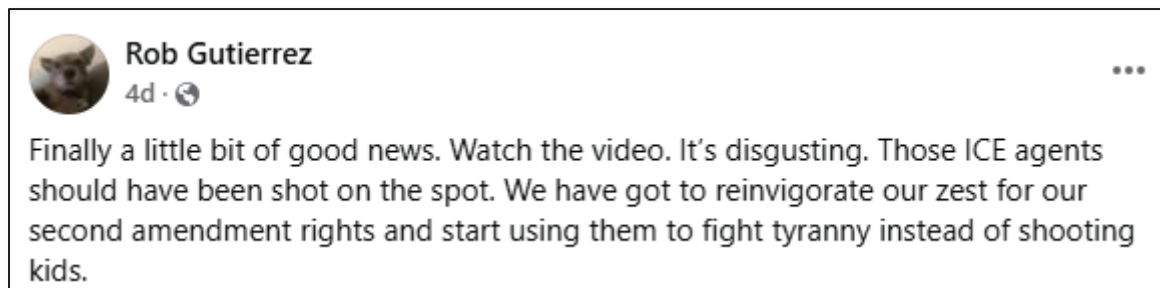
WATCH: DHS Secretary Noem tours El Salvador prison holding deported Venezuelans

 Like  Share

16. King recently stated on Facebook that he “ha[s] no respect for law enforcement” and acknowledged that his “rhetoric is growing increasingly more violent.”



17. I have set forth additional examples of King’s anti-government, anti-law enforcement, and violent rhetoric on Facebook below:



 **Rob Gutierrez**
4d · 



They should have done us all a favor and blown them the fuck up.



JD and his wife had to stay at a US Base in Northern Greenland because no one else in the country was willing to host them. That's how much Greenland wants to be a part of the United States.
@acnewsitics

 **The Other 98%** 
4d · 

 Like  Share

 **Rob Gutierrez**
March 25 at 1:43 PM · 

Marjorie Taylor Greene should be tried for treason and shot by a firing squad.



Rob Gutierrez

March 25 at 11:00 AM · 🌐



Try to enforce your religion on me and I will SHOOT AND KILL you.



Rob Gutierrez

March 19 at 5:39 PM · 🌐



My heart weeps for this world. It's making me a monster too. But a monster I will be until this stops.



NPR

March 19 at 7:00 AM · 🌐

Israel launched deadly strikes in Gaza to pressure Hamas to agree to a new ceasefire. Hamas isn't budging, and more than half of recently freed hostages oppose the renewed war. Why is Israel doing it?




Rob Gutierrez

March 18 at 3:44 PM · 🌐




I'm absolutely going to burn a Tesla now.


US Attorney General Pam Bondi issues chilling message to anti-Musk protesters: "If you're gonna touch a Tesla, go to a dealership, do anything, you better watch out, because we're coming after you."

 **Rob Gutierrez**
March 18 at 2:42 PM · 🌐


Nazism. I'm gonna start saying it every day till I'm arrested, these men need to die.

 **NPR** ✓
March 18 at 10:29 AM · 🌐


The U.S. Institute of Peace, a think tank funded by Congress, was the scene of a hostile takeover by the Department of Government Efficiency. DOGE has tried to install new leadership at the institute.


 **Rob Gutierrez**
March 18 at 2:40 PM · 🌐

Is these republicans aren't dead or in jail after all this is over we have majorly fucked up. This witch needs to burn.



 **The Dallas Morning News** ✓
March 16 at 8:00 PM · 🌐


The Trump administration sent hundreds of immigrants to El Salvador even as a federal judge issued an order temporarily barring the deportations under an 18th century wartime declaration, officials said Sunday. Flights were in the air at the time of the ruling.




DALLASNEWS.COM 

Trump administration deports hundreds of immigrants despite judge's order


 Like  Share

 **Rob Gutierrez**
March 16 at 1:44 PM · 🌐

So we're really just letting this play? Just letting a rogue President dismantle our country and imprison people with no fight whatsoever? I am ready to take up VIOLENT arms against a tyrannical government. I will NOT be complicit in another Nazi Germany. My question is what the fuck is wrong with all of you that you aren't ready to do the same?

 **AP** ✓
March 16 at 11:19 AM · 🌐


BREAKING: The Trump administration has transferred hundreds of immigrants to El Salvador even as a judge blocked the deportations under an 18th century wartime declaration.



APNEWS.COM

Trump administration deports hundreds of migrants, despite judge's order stopping removal

👍 Like ➦ Share

 **Rob Gutierrez**
March 16 at 8:04 AM · 🌐

Current Director of the FBI needs to be shot and killed and I hope he sees this I'm so serious. I dare you to arrest me motherfucker. You're a gestapo piece of shit who doesn't belong in our government or even country. Get fucked.

👍 Like ➦ Share

18. On or about February 28, 2025, King posted on Instagram his belief that the President is “a traitor to our country and interests” and “demand[ed] he be put to death.” King appended this post, stating, “I don’t give a fuck anymore, give me the gun I’ll pull the trigger myself. Come get me FBI. Fuck this country.”



Conclusion

19. Based on my training and experience and the facts as set forth in this affidavit, I submit that there is probable cause to believe that on or about March 29, 2025, in the Northern District of Texas, Dallas Division, Robert Wilson King knowingly

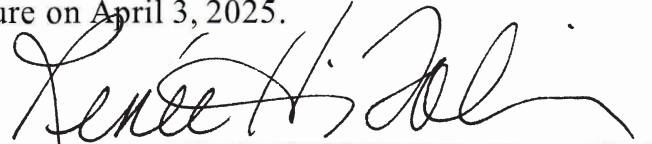
a threat to injure the person of another, that is, ICE agents, for the purpose of issuing a threat, with knowledge that the communication would be viewed as a threat, and with conscious disregard of a substantial risk that the communication would be viewed as a threat, in violation of 18 U.S.C. § 875(c).

Respectfully submitted,



BRANT L. DODDY
Task Force Officer, FBI

Agent sworn and signature confirmed via reliable electronic means, pursuant to Rules 4.1 of the Federal Rules of Criminal Procedure on April 3, 2025.



RENEE HARRIS TOLIVER
UNITED STATES MAGISTRATE JUDGE