

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America )

v. )

Dominique Jade Dragan )

Case No.

8:21MJ1712AAS

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 January 2020 through July 2021 in the county of Hillsborough in the Middle District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. § 2261A(2)

Offense Description
With intent to harass or intimidate, using an electronic communication service to place another person in reasonable fear of serious injury or death

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.



Sworn to before me and signed in my presence.

Date: July 21, 2021

Amanda A. Sansone
Judge's signature

City and state: Tampa, FL

Hon. Amanda A. Sansone, U.S. Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I [REDACTED], a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the FBI, and I have been employed with the FBI since March 2020. After completing FBI Academy training, I was assigned to the FBI Tampa Division, Tampa Field Office. I am presently assigned to the FBI Tampa Division, Violent Crime Task Force, where my duties include investigating a variety of criminal violations of federal laws, including but not limited to, gang/criminal enterprise investigations, crimes of violence, drug trafficking, firearms offenses, and threat investigations.

2. This affidavit is made in support of an application for an arrest warrant for Dominique Jade DRAGAN for, with intent to harass or intimidate, using an electronic communication service to place another person in reasonable fear of serious injury or death, in violation of 18 U.S.C. § 2261A(2). The evidence shows that, at least from on or about January 2, 2020 to on or about July 13, 2021, DRAGAN used Instagram to threaten and harass victim M.S. and that, at least from on or about November 24, 2020 to on or about July 13, 2021, DRAGAN used Instagram to threaten and harass victim R.L.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

4. On or about May 18, 2021, the Federal Bureau of Investigation received a complaint through their National Threat Operations Center from M.S. and R.L. regarding Dominique Jade Dragan (“DRAGAN”). DRAGAN had sent threatening messages to M.S., who resides in Tampa, Florida, her partner R.L., who resides in Tampa, Florida, and her daughter, A.R., who resides in Chicago, Illinois. M.S. sent screenshots with the initial complaint showing that the Instagram account handle @djdragan\_ sent death threats to R.L. and M.S via Instagram private messages.

5. DRAGAN is a United States citizen who currently resides in the Middle District of Florida. As further discussed below, on or about June 3, 2021, the FBI located and interviewed DRAGAN in Tampa, Florida, and he admitted that he had sent threatening messages to the victims from the @djdragan\_ Instagram account. According to the Florida Driver and Vehicle Information Database, DRAGAN resides in Tampa, Florida.

6. According to M.S., whom the FBI interviewed, DRAGAN briefly dated her daughter, A.R., for approximately one month in or around 2010 or 2011. After the relationship ended, A.R. had minimal communication with DRAGAN. In or around December 2019, A.R. started receiving racially charged threats from numerous Instagram accounts she believed were operated by DRAGAN, including the account @djdragan\_. A.R. had provided screenshots of these communications to M.S., who in turn provided them to the FBI. These screenshots document threats to A.R. including “I’m pull up and murder you,” “I’ll kill you in [mutual friend of DRAGAN and A.R.’s] apartment,” “I can’t wait to hear the bones in your neck break,” “I can’t wait to murder you,” “I’m gonna put a bullet in your forehead,” and “I’ll kill you at the court house you wetback NIGGER.” Additionally, A.R. replied to one of these threats, “So you want to kill me dj?” DRAGAN replied, “Yup,” “I’ll do it with my bare hands.”

7. According to M.S., DRAGAN subsequently began to stalk and threaten M.S. and her partner R.L. in or around January 2020. On or about May 19, 2021, M.S. and R.L. allowed the FBI to download information stored on their Instagram accounts, which contained threats sent from Instagram account handle @djdragan\_ beginning on or about January 2, 2020 for M.S. and on or about November 24, 2020 for R.L.

8. The messages from DRAGAN to R.L. via the @djdragan\_ account include the following on or about March 14, 2021: "And if I would've been in Ybor when that chipmunk nigger bitch was there you wouldn't received a call that your chipmunk nigger bitch was at TGH in the trauma department." On or about April 18, 2021, DRAGAN sent: "Just know when I se your pussy ass I'm going to gladly take my first charge and break your neck you fuckin faggot," and "When you and your pussy white friend pull up to my shit I'll be coming out the house with a AR-15." On or about May 16, 2021, DRAGAN sent: "I'm gonna murder your girl too," "You fuckin nigger I'll kill your whole family." In the course of threatening R.L., DRAGAN also asked R.L. to call him, saying "Call me I wanna talk," "[phone number ending in - 0185]," "Or else I'm gonna burn your house down if you don't," "I'm gonna strangle your daughter to death," and "And then break her neck."

9. The messages from DRAGAN to M.S. via the @djdragan\_ account include the following messages sent from on or about March 14, 2021 to on or about May 5, 2021: "I'll break your shit slut," "I'll bloody you up real fuckin good you worthless whore," "You better start shopping for electric WHEELCHAIRS," "Coffins & head stones," "FUNERAL arrangements," and "Nothing sounds more rewarding then beating the living shit out of you."



10. According to M.S.'s daughter A.R., whom the FBI interviewed, DRAGAN used the same phone number ending in -0185, which DRAGAN referenced in a message to R.L., when they were dating in or around 2010 or 2011. Additionally, according to information provided by T-Mobile on or about June 21, 2021, that phone number belongs to DRAGAN. A.R. stated that DRAGAN has sent her threatening messages from multiple accounts for years.

11. In addition, according to A.R., in or around May 2021, DRAGAN utilized the @djdragan\_ to threaten the life and safety of A.R.'s father, V.R. The FBI interviewed V.R., who provided screenshots of @djdragan\_ sending messages to V.R. including: "Your ex bitch will have 3rd degree burns if she dares to go to the law about me," "I'll crack the back of your skull and I won't lose 1 hour of sleep over it you poor ass nigger," "Fuck your daughter," "Fuck your race," "I'll knock her fuckin teeth out CHICO," and "And I'll snap your neck."

12. On or about June 3, 2021, the FBI located and interviewed DRAGAN in Tampa, Florida. DRAGAN admitted that he owned the Instagram account @djdragan\_ and that he had sent threatening messages to the victims through that account. DRAGAN agreed to cease all contact with the victims.

13. From on or about June 28, 2021 to on or about July 7, 2021, however, DRAGAN resumed sending racially charged, threatening messages to M.S. and R.L. from a new Instagram account, @dragan66kg. The profile picture of the new Instagram account matches the picture for the original account of @djdragan\_ and the threats are similar to those sent from @djdragan\_. M.S. and R.L. provided screenshots to law enforcement as proof of the ongoing threats, which included, "You're a certified pussy," "Going to the police and FBI like a scared little pussy," "You no top lip raccoon eye nigger bitch", "I pray to god the daughter gets slaughtered in a horrible plane crash at sea to never be found again," and "And I hope the wetback nigger mother gets killed in a car accident right on Fletcher avenue."

14. Furthermore, these recent messages sent on or about June 28, 2021 to M.S. suggest that DRAGAN is stalking her in person. The messages reference Aldi, a grocery store: "Shopping at Aldi's go back to your country nigger bitch." According to M.S., she had only been to Aldi in the few weeks prior to that message, leading M.S. to believe DRAGAN had followed her to that grocery store.



15. According to M.S. and R.L., DRAGAN's threats and stalking have caused the victims to change aspects of their daily lives. M.S. has feared doing laundry due to her laundry room being detached from their home and the

possibility of DRAGAN waiting on her as she enters. R.L. purchased a handgun for M.S. with intent for her to get her concealed carry license to protect herself from DRAGAN. Neither R.L. nor M.S. have slept well. Additionally, they took their teenage children to their relatives' home out of fear that DRAGAN would execute his threats.

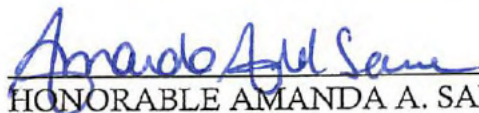
**AUTHORIZATION REQUEST**

15. Based on the foregoing, I have reason to believe that there is probable cause that Dominique DRAGAN has violated 18 U.S.C. §2261A(2) (with intent to harass or intimidate, using electronic communication service to place another person in reasonable fear of serious injury or death). I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

16. This completes my affidavit.

  
Special Agent 

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this the 21<sup>st</sup> day of July, 2021.

  
HONORABLE AMANDA A. SANSONE  
United States Magistrate Judge