

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America)

v.)

Deep Alpesh Kumar Patel)

Case No.)

8:23MJ2359SPF)

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 October 21, 2023 in the county of Sarasota in the Middle District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 875(c)

Transmitting interstate threat to injure

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

[Redacted signature]

[Redacted name] FBI Task Force Officer
Printed name and title

Sworn to before me over the telephone or other reliable electronic means and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: 11/1/2023

[Signature]
Judge's signature

City and state: Tampa, Florida

Hon. Sean P. Flynn, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, [REDACTED], being first duly sworn, hereby depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Detective with the Sarasota Police Department, and I have been so employed since September 2002. Since September 2012, I have been assigned as a Task Force Officer to the Federal Bureau of Investigation ("FBI") Tampa division's Sarasota Resident Agency, Joint Terrorism Task Force. I previously was a law enforcement officer with the Asheville Police Department in Asheville, North Carolina from February 1995 to August 2002. I have been trained in obtaining probable cause, surveillance techniques, the interviewing of subjects and witnesses, and the planning and execution of arrest, search, and seizure warrants. I have also received training on criminal violations at various conferences and venues.

2. I submit this affidavit in support of a criminal complaint charging DEEP ALPESH KUMAR PATEL ("PATEL"), a U.S. citizen who resides in Sarasota, Florida, with transmitting in interstate commerce a threat to injure, in violation of 18 U.S.C. § 875(c).

3. The statements contained in this affidavit are based on my personal knowledge and experience, and reliable information from other law

enforcement officers and computer databases. Because of the limited purpose of this affidavit, I have not included each and every fact known to me. Rather, I have included only those facts necessary to establish probable cause supporting the requested complaint.

PROBABLE CAUSE

4. On or about October 21, 2023, at approximately 1:31 p.m., the World Jewish Congress¹ located in New York, New York received a voicemail from a phone number with area code 941 (the “941 number”). At the outset of the voicemail the caller identified himself as “Deep Patel, D-e-e-p, Patel, P-a-t-e-l.”

5. The caller then stated:

I want to let you guys know, fuck all of you. Fuck all of you Israelis. Fuck all of you, every single one of you. I wish you guys go to hell. I do not want anything from you guys nothing, I just want you guys to go to fucking hell. You guys deserve it. FUCKING HELL! Fucking don't deserve nothing, not one thing from THIS FUCKIN WORLD! GO TO FUCKIN HELL! FUCK YOU GUYS! FUCK YOU! If I had a chance I would kill every single one of you Israelis. EVERY SINGLE ONE OF YOU! Cause mass genocide of every single Israeli, FUCK YOU! FUCK ALL OF YOU ISRAELIS, EVERY SINGLE ONE OF YOU, COCK SUCKING MOTHER FUCKERS! Thank you.

¹ According to the organization's website, the World Jewish Congress was founded in 1936 with the initial aim to “mobilize the Jewish people and the democratic forces against the Nazi onslaught, to fight for equal political and economic rights everywhere, to support the establishment of a Jewish National Home in Palestine, and to create a world-wide Jewish representative body based on the concept of the unity of the Jewish people, democratically organized and able to act on matters of common concern.” Supporting Israel is among the organization's several focus areas.

6. Through subsequent investigation the FBI learned that the 941 number returns to **PATEL**, a 21-year-old male residing at an address known to law enforcement in Sarasota, Florida, which is in the Middle District of Florida.

7. On October 24, 2023, at approximately 2:51 p.m., law enforcement officers made contact with **PATEL** at his home in Sarasota. **PATEL** agreed to speak with the officers and presented his Florida driver's license, which confirmed his identity. The officers interviewed **PATEL** at the end of the home's driveway.

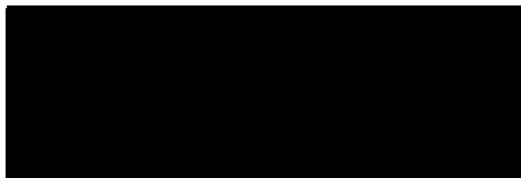
8. The officers asked **PATEL** if he knew why they had come to his home to speak with him. **PATEL** responded that he believed that the interview was related to telephone calls that he had made.

9. When the officers asked **PATEL** to describe the content of the telephone calls, he explained that he had called Jewish centers to express his family's anger with Israel for the genocide of the Palestinian people. **PATEL** stated that he did not intend to scare or threaten anyone, but that he wanted to use the harshest language possible to convey his anger.

10. **PATEL** informed the officers that his cell phone number is the 941 number, which is the same number that left the voicemail at the World Jewish Congress on October 21, 2023.

CONCLUSION

11. Based on the foregoing information, I respectfully submit that probable cause exists to believe that Deep Alpesh Kumar PATEL knowingly transmitted in interstate commerce a true threat to injure the person of another, in violation of 18 U.S.C. § 875(c).



Task Force Officer
Federal Bureau of Investigation

Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by telephone or other reliable electronic means consistent with Fed. R. Crim. P. 4.1 and 4(d) before me this 1st day of ~~October~~ 2023.

November

A handwritten signature in blue ink, appearing to read 'S. Flynn'.

HON. SEAN P. FLYNN
United States Magistrate Judge