

Approved: Jessica K. Feinstein
 JESSICA K. FEINSTEIN
 ASSISTANT UNITED STATES ATTORNEY

Before: HONORABLE LISA MARGARET SMITH
 United States Magistrate Judge
 Southern District of New York

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UNITED STATES OF AMERICA : SEALED COMPLAINT

- v. - : Violation of
 18 U.S.C. § 1001

JUAN MEDINA, :
 Defendant. : COUNTY OF OFFENSE:
 WESTCHESTER

- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

TODD K. GARAVANTA, being duly sworn, deposes and says that he is a Special Agent with the United States Secret Service (the "Secret Service"), and charges as follows:

COUNT ONE
 (False Statements)

1. From at least on or about September 1, 2014, up to and including at least on or about September 3, 2014, in the Southern District of New York and elsewhere, JUAN MEDINA, the defendant, willfully and knowingly did make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive, legislative, and judicial branches of the Government of the United States, to wit, MEDINA made false statements to agents of the United States Secret Service denying that he made a 911 emergency call in which he falsely reported a plot to assassinate the President of the United States.

(Title 18, United States Code, Sections 1001(a)(2) and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Special Agent with the Secret Service and have been employed by the Secret Service for approximately four years. I have been personally involved in the investigation of this matter, and I base this affidavit on that personal experience, as well as on my conversations with other law enforcement agents and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the offenses cited above, it does not include all the facts that I have learned during the course of the investigation. Where the contents of conversations of others are reported herein, they are reported in substance and in part.

The Fake 911 Call

3. Based on my involvement in this investigation, my conversations with other law enforcement officers, and my review law enforcement records, I have learned the following:

a. On or about August 29, 2014, the President of the United States visited Westchester County.

b. On or about August 29, 2014, at approximately 10:28 a.m., 911 emergency operators at the Hudson Valley Traffic Management Center in New York received a phone call regarding a plot to kill the President. The caller ("Caller-1") identified himself as Hassan, but refused to give his phone number or last name because he said he was afraid for his life.

c. Caller-1 told the operator that his former roommate ("Suspect-1") was planning to travel to the New York area from Connecticut to kill the President, and that he would arrive sometime between 12:00 p.m. and 2:00 p.m.

d. Caller-1 told the operator that Suspect-1 possessed two firearms, an AR-15 and an AK-47. Caller-1 provided Suspect-1's last known address in New Haven, Connecticut (the "New Haven Address"), and the description and license plate number of a vehicle Suspect-1 was last seen driving ("Vehicle-1").

The Search for Suspect-1

e. After receiving this 911 call, dozens of federal, state, and local law enforcement were dispatched to attempt to locate Suspect-1 and Vehicle-1.

f. On or about August 29, 2014, at approximately 2:00 p.m., Secret Service agents arrived at the New Haven Address and spoke to roommates of Suspect-1. The roommates provided Secret Service with a cellphone number for Suspect-1, and told agents that Suspect-1 has a girlfriend ("Associate-1") in Yonkers, New York.

g. On or about August 29, 2014, at approximately 2:40 p.m., the United States Secret Service/New York Electronic Crimes Task Force initiated wireless tracking on the cellphone number for Suspect-1. An alert was issued in Connecticut, White Plains, New York, and contiguous areas, informing law enforcement that Suspect-1 was possibly armed and wanted for questioning by the Secret Service.

h. On or about August 29, 2014, at approximately 10:00 p.m., Secret Service agents located Vehicle-1 in Hamden, Connecticut.

i. On or about August 29, 2014 at approximately 10:40 p.m., Secret Service agents located Suspect-1 in Hamden, Connecticut. After searching Suspect-1's car and apartment, agents found no evidence supporting Caller-1's allegations.

j. Suspect-1 cooperated with law enforcement and was transported to the New Haven Secret Service office for an interview. During the interview, Suspect-1 indicated surprise that he was the subject of a Secret Service alert. Suspect-1 provided law enforcement with a detailed account of his whereabouts throughout the day. This account was corroborated by wireless cellphone tracking.

k. Suspect-1 told law enforcement that Suspect-1 believed an individual named Juan LNU was responsible for the 911 call. Suspect-1 stated that Juan is a close friend and/or relative of Associate-1, and Juan has always disliked Suspect-1.

The False Statements

l. On or about September 1, 2014, Secret Service and Yonkers police officers traveled to the home of Associate-1 in Yonkers, New York. JUAN MEDINA, the defendant, answered the door and told the agents and officers he lives with Associate-1, who is his girlfriend.

m. After being informed by the Secret Service agents that they were federal agents, JUAN MEDINA, the

defendant, acknowledged that he dislikes Suspect-1 and told agents he wanted to "kick his ass." In response to questioning by the Secret Service agents about the 911 call, MEDINA denied calling 911.

n. On or about September 1, 2014, Secret Service agents and Yonkers police interviewed Associate-1. Associate-1 denied that JUAN MEDINA, the defendant, was Associate-1's boyfriend, and said that MEDINA could have made the 911 call.

o. On or about September 3, 2014, JUAN MEDINA, the defendant, voluntarily agreed to be interviewed by the Secret Service and Yonkers police. MEDINA arranged to travel to the White Plains Secret Service office for the interview.

p. During the interview, JUAN MEDINA, the defendant, again told the Secret Service that he did not make the 911 call claiming Suspect-1 was planning to kill the President. MEDINA denied knowing who made the call. MEDINA provided a written statement summarizing his verbal statements.

q. On or about September 3, 2014, JUAN MEDINA voluntarily agreed to take a polygraph test to verify his statement that he did not make the 911 call. Before taking the test, MEDINA signed a written warning of rights and consent to speak form. MEDINA took a polygraph test administered by the Secret Service. The test results indicated that MEDINA was deceptive.

r. Shortly after JUAN MEDINA, the defendant, failed the polygraph test, he made an oral admission to the Secret Service that on August 29, 2014, at approximately 10:30 a.m., he had called 911 using a pre-paid "burner" cellphone. MEDINA said he told the 911 operator that Suspect-1 was in possession of large weapons and traveling from Connecticut to New York to kill the President. MEDINA said that after he made the 911 call, he sold the cellphone to an unknown male. MEDINA told the Secret Service that he has never heard Suspect-1 discuss a plot to kill the President, and that he has never seen Suspect-1 in possession of automatic weapons. MEDINA said that he made the 911 call because he does not approve of the relationship between Suspect-1 and Associate-1.

s. On or about September 3, 2014, JUAN MEDINA, the defendant, provided the Secret Service with a written statement confirming that he made the false 911 call. In the

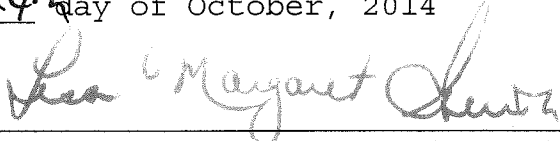
statement, MEDINA explained that he made the call because he wanted Suspect-1 to get in trouble.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of JUAN MEDINA, the defendant, and that he be arrested and imprisoned or bailed, as the case may be.



TODD K. GARAVANTA
SPECIAL AGENT
UNITED STATES SECRET SERVICE

Sworn to before me this
24th day of October, 2014



THE HONORABLE LISA MARGARET SMITH
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK