

UNITED STATES DISTRICT COURT

for the

Northern District of Florida

United States of America )

v. )

DANIEL ALAN BAKER )

Case No. )

4:21mj9-MAF )

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 12-14, 2021 in the county of Leon in the Northern District of Florida, the defendant(s) violated:

Code Section

Offense Description

Title 18, U.S.C., § 875(c)

Transmission In Interstate Commerce A Communication Containing A Threat To Kidnap Any Person Or Threat To Injure The Person of Another

This criminal complaint is based on these facts:

See attached affidavit of Federal Bureau of Investigation Special Agent Nicholas Marti, which is incorporated herein by reference.

Continued on the attached sheet.

CERTIFIED A TRUE COPY Jessica J. Lyublanovits

By Anna Mazur Deputy Clerk

Nicholas Marti Complainant's signature

Nicholas Marti, FBI Special Agent Printed name and title

Sworn to before me and signed in my presence.

Date: 01/14/2021

Charles A. Stampepos Judge's signature

City and state: Tallahassee, Florida

CHARLES A. STAMPELOS, U.S. Magistrate Judge Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

UNITED STATES OF AMERICA

v.

DANIEL ALAN BAKER

Case No.: 4:21mj9-MAF

By Jessica J. Lyubljanovits  
Deputy Clerk

CERTIFIED A TRUE COPY  
Jessica J. Lyubljanovits

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Your affiant, Nicholas Marti, being first duly sworn, hereby deposes and states as follows:

**I. INTRODUCTION**

1. Your affiant is a “federal law enforcement officer” within the meaning of Federal Rule Of Criminal Procedure 41(a)(2)(C), that is a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a complaint. Your affiant is a Special Agent with the Federal Bureau of Investigation (“FBI”) and has been so employed for approximately one (1) year and four (4) months. Your affiant is currently assigned to the Jacksonville Field Office, Tallahassee Resident Agency. As part of my duties, your affiant investigates crimes including but not limited to Hobbs Act robberies, bank robberies, computer-related crime, fraud, public corruption, offenses involving weapons of mass destruction, national security matters, and others. Your affiant received training on the proper investigative techniques for these violations, including the application and execution

of arrest and search warrants. Your affiant has conducted and assisted in criminal investigations and has been involved in the execution of search warrants and arrest warrants. Prior to working as an FBI Special Agent, your affiant was a United States Marine Corps combat engineer and a nuclear security officer from 2011 to 2019.

2. This Affidavit is based upon my personal knowledge, experience and training, and other information developed during the course of this investigation. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included each and every fact known to me concerning this investigation or potential violations of other criminal offenses. I have set forth only those facts I believe are necessary to establish probable cause to show that the subject of this Criminal Complaint, **Daniel Alan BAKER** (“**BAKER**”), has committed violation(s) of Title 18, United States Code, Section 875(c), which makes it a federal felony offense to “transmit[] in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.”

## **II. PROBABLE CAUSE**

3. On October 8, 2020, the FBI was notified that **BAKER** was threatening the use of violence in the United States and was using social media to recruit and train like-minded individuals in furtherance of his Anti-Government or Anti-Authority Violent Extremism Ideology. **BAKER** has made multiple violent threats

to those he claims are white supremacists, fascists, United States persons with different ideologies than his, and allies of the United States. In addition, **BAKER** has promoted the killing of United States military officers.

4. As of recent, **BAKER's** social media posts have escalated, indicating a potential for immediate threat during upcoming protests in Tallahassee, Florida. Due, in part, to recent violence around the country, your affiant believes that a fair probability exists that **BAKER** may attempt to violently disrupt protests. Over the past several months, **BAKER** has often utilized his social media platform to project his displeasure with the current events unfolding in the United States as well as social issues he believes to be plaguing the country, including police brutality.

5. Recently, however, **BAKER** has been posting messages and multimedia to his Facebook, Instagram, and YouTube accounts that have been increasingly ripe with extremist rhetoric.

6. From 2006 to 2007, **BAKER** was enlisted in the United States Army as an airborne infantryman. He was removed from military service with an other-than-honorable discharge after he went AWOL prior to his unit deploying to Iraq. From 2008 to 2017, **BAKER** was homeless and unemployed. During that time, he mainly resided in the Tallahassee, Florida area and worked occasionally as a security guard.

7. In 2017, **BAKER** joined the People's Protection Units ("YPG"), a group fighting in Syria against ISIS and the Turkish Government. The YPG is a sub-affiliate of Kurdistan's Working Party ("PKK"), which has been designated a Foreign Terrorist Organization ("FTO") by the United States government. **BAKER** endorses himself on his social media as a trained sniper for the YPG.

8. As documented in a VICE documentary, **BAKER** can be seen fighting ISIS or Turkish militants, as shown in a YouTube video. Through documented interviews with FBI Special Agents, **BAKER** admitted to training members who attended the YPG International Academy on military tactics and defensive tactics. Multiple overseas sources reported that **BAKER** stated he intended to return to the United States with the intention to lure Turkish pilots training on United States military bases off the installation, after which he would kill or mutilate them in furtherance of helping the YPG fight the Turkish government. **BAKER** returned to the United States in April 2019 from the Middle East.

9. **BAKER** has traveled across the United States to participate in protests that have resulted in violence to include joining the CHOP/CHAZ movement in Seattle, Washington during the summer of 2020. CHAZ refers to the "Capitol Hill Autonomous Zone" and CHOP refers to the "Capitol Hill Organized Protest," which was a protest and self-declared autonomous zone in the Capitol Hill neighborhood of Seattle, Washington. **BAKER** has used social media as a way to promote,

circulate, encourage and educate followers on how to incapacitate law enforcement officers while at a protest. For instance, **BAKER** has posted and informed his followers on how to debilitate law enforcement officers by filling up balloons with paint and to throw them at law enforcement.

10. **BAKER** continues to threaten the use of violence in the United States and has made multiple threats to those who he claims to be white supremacists, fascists, United States persons with different ideologies than his, and allies of the United States. **BAKER** has promoted the killing of United States military officers. In addition, **BAKER** informed his followers on social media to prepare for war.

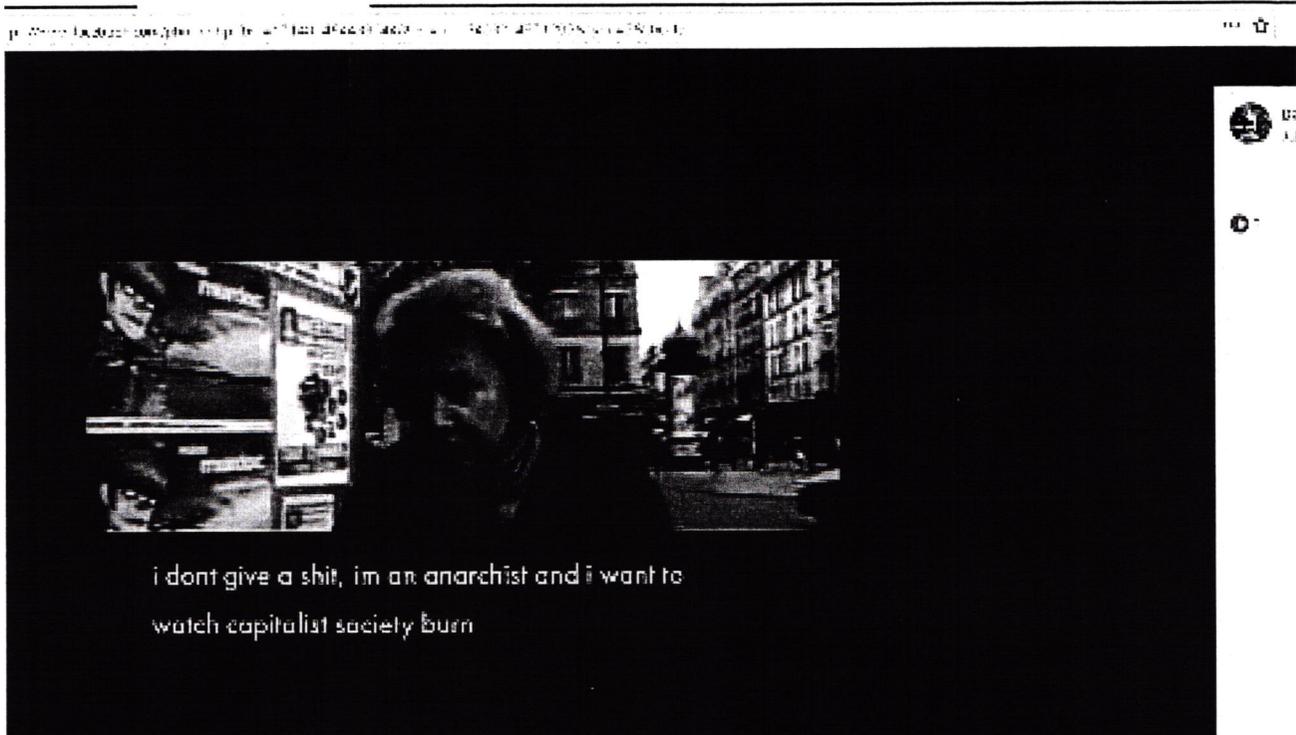
11. Your affiant is aware that **BAKER** owns multiple firearms. On January 14, 2021, **BAKER** posted on social media that he desired to purchase more firearms, including an “ak or a pistol??” From your affiant’s training and experience, I know that an “ak” generally refers to an AK-47, a military-style assault rifle.

12. Your affiant also learned that **BAKER** applied to the Tallahassee Community College (“TCC”) Emergency Medical Technician (“EMT”) program. Your affiant learned that **BAKER** has had difficulty finding the means to pay for his future EMT courses, as he has attempted to acquire funding through [www.gofundme.com](http://www.gofundme.com), a social fundraising platform. In November 2020, **BAKER** posted the following on Facebook:

“I swear on god yall if I can’t raise this money I will start robbing the rich and pedophiles too. This is my last fundraiser before I commit to organized crime. I’ve gotten do[sic] much toxic resistance and so little help from asking nicely that I’ve come to the conclusion that it doesn’t work. So, if this doesn’t work, I’m not asking any more[sic] and I’m done being nice. I will pay for this one way or another and I’m willing to do ANYTHING to ANYONE so I don’t end up homeless and hungry again. Help keep me honest or watch me compromise my integrity and character to survive.”

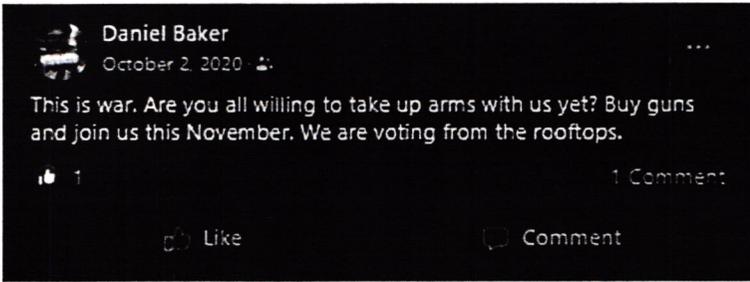
13. In addition to his online postings, **BAKER** has travelled around the country to protest against police brutality and the destruction of America, including travel to Seattle, Washington and Nashville, Tennessee. The following is a chronological timeline of events and items of concern on **BAKER** discovered by both the FBI and Florida Department of Law Enforcement (“FDLE”) through both open source and investigative means. These items show **BAKER**’s path toward radicalization as well as a fair probability for imminent violence.

14. On June 26, 2020, **BAKER** posted a meme on his Facebook page of a photo of an older woman giving an interview with the statement “I don’t give a shit, I’m an anarchist and I want to watch capitalist society burn.”



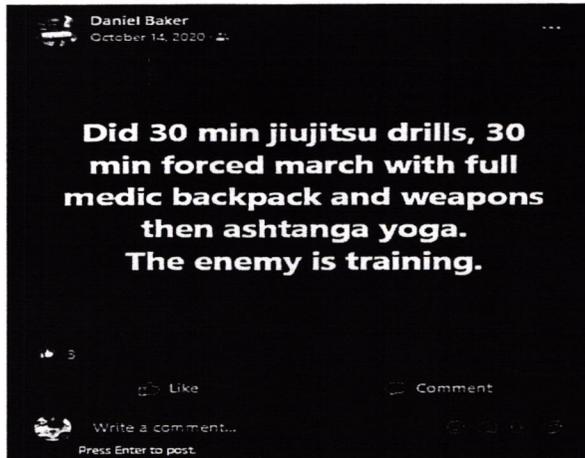
15. On August 1, 2020, **BAKER** posted a video to his YouTube account which portrayed footage from CHAZ/CHOP. In the description section of the video, **BAKER** wrote that footage shows him treating the wounded in CHAZ/CHOP and states that the video is his response to the “domestic terrorists trying to accuse [him] of murdering the kid [he] helped save” and that he will be filing lawsuits against those who slandered his name.

16. On October 2, 2020, **BAKER** authored a Facebook post stating: “This is war. Are you willing to take up arms with us yet? Buy guns and join us this November. We are voting from the rooftops.” On that same date, **BAKER** posted again that he just purchased a firearm from a grocery store.



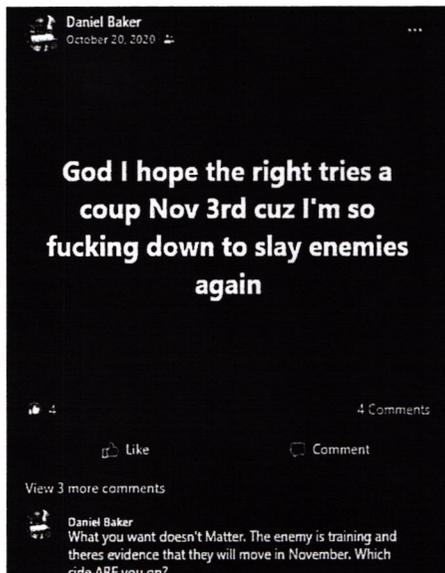
17. On October 13, 2020, **BAKER** was featured in an article “*The Fall of the Chop*” on Webflow (<https://the-fall-of-chop.webflow.io/>). Within the article, **BAKER** identifies himself as a “hardcore leftist.” **BAKER** stated he had traveled to Seattle to participate in the “Revolution.” **BAKER** talked about fighting with the YPG during the interview and stated that once the war was over, “the revolutionary ideals that made them appealing were applied to the civil rights movement of today.” The article noted that **BAKER** “seemed disappointed in the lack of violent opposition here.” **BAKER** is quoted as saying, “I told them, if they really wanted a revolution, we needed to get AK’s and start making bombs. No one listened to me.”

18. On October 14, 2020, **BAKER** authored another Facebook post advising of his training. The post states: “did 30 min jiu-jitsu, 30 min forced march with full medic backpack and weapons and then ashtanga yoga. The enemy is training.”

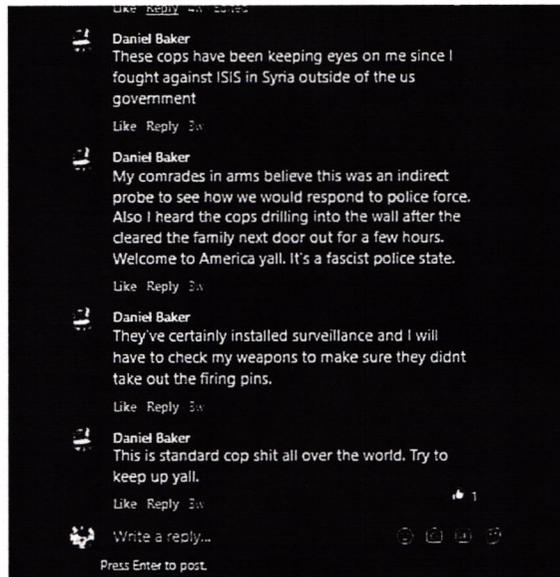


19. In a video titled “Training for the next mission” posted to **BAKER**’s YouTube account on October 16, 2019, **BAKER** is seen shooting an AK-47 weapon at a gun range and states “I’m coming back to Syria and I’m going to shoot any Jihadis and Turks that get in our way.”

20. October 20, 2020, **BAKER** authored a post advising of the upcoming civil war: “God I hope the right tries a coup Nov 3<sup>rd</sup> cuz (sic) I’m so fucking down to slay enemies again.”

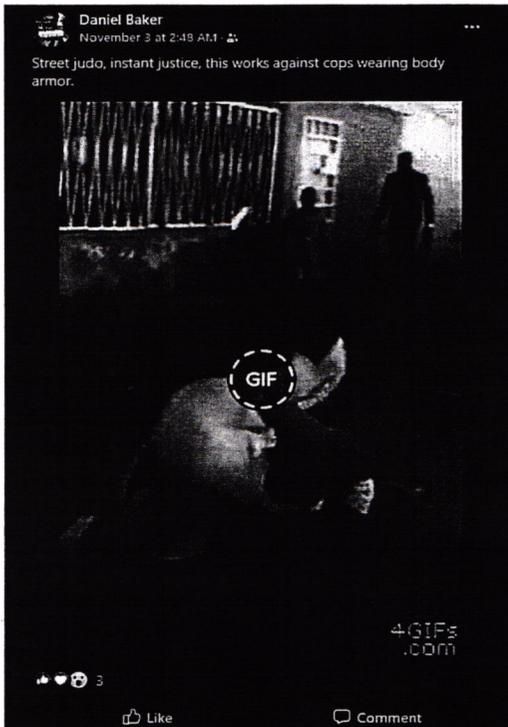


21. On October 23, 2020, the Tallahassee Police Department (“TPD”) was attempting to locate a subject possessing outstanding felony warrants who resided in an apartment in proximity to **BAKER** and his roommate, E.C.. During the attempt to locate, TPD officers conducted an investigative stop on E.C., believing he may be the subject they were looking for. During the detention, **BAKER** began taking photos of TPD and United States Marshals Service (“USMS”) unmarked vehicles. **BAKER** subsequently posted the photos of the vehicles on his Facebook, seemingly for intelligence purposes for his following. Your affiant believes that **BAKER** understood law enforcement’s presence that day was to probe him indirectly.



22. On November 3, 2020, **BAKER** posted “Prepare for war. #November3rd”. The following day, he posted again on Facebook saying “Enjoying the peace and quiet until Thursday yall. It may be the last time some of us see peace.”

23. On this same date, **BAKER** posted a gif (an emoji or emoticon) showing “street judo.” He advised that the technique used would be effective against law enforcement with body armor.



24. On November 5, 2020, **BAKER** posted to his Facebook account: “Cops try to sound professional and official and just end up sounding like cold blooded nazis.”

25. Between October 28, 2020, and November 11, 2020, **BAKER** posted four workout-type videos that contain anarchist-type monologues playing in the background of the videos. At least one of the background monologues was from “Audible Anarchist,” a podcast. As depicted in the image below, the November 11,

2020, video shows **BAKER** in blue clothing with what appears to be a shotgun leaning against the wall behind him and a firearm on the shelf behind him.



strong workout to gentle cool down

SC video - Streamed live on Nov 11, 2020

SHARE SAVE

26. On November 21, 2021, **BAKER** posted a video to his YouTube channel that provided a tutorial on first aid. The video is titled: “Basic first aid for protestors part 1.” In the video, **BAKER** demonstrates basic first aid techniques.

27. On December 10, 2020, **BAKER** posted on Facebook: “Trump still plans on a violent militant coup. If you don’t have guns you won’t (sic) survive 2021.” On this same date, **BAKER** posted a meme that appears to make a reference to “eating the rich.”



28. On December 12, 2020, **BAKER** posted on social media: "It's time for some of you to wake up and realize trump is going to put up a fight. Some of your neighbors will shoot at you." The following day on December 13, 2020, **BAKER** made a post to his Instagram account trying to sell a piece of artwork and stated in the caption of the photo that his artwork is "gonna be valuable when I'm in prison."

29. On December 14, 2020, **BAKER** posted a photo to his Instagram account with a photo that read "Hospitalize your local fascist" and captioned the post "#stabnazis."

30. On December 17, 2020, **BAKER** made a post to his Instagram account that appears to resemble bombs or explosives being dropped from the sky and captioned the post "Jacksonville nazis gonne (sic) be real sad when this happens to their hq." In the comments section of the post, **BAKER** indicates that the post was

about a News4Jax article titled "Threatening Letter Left at Door of Duval Democratic Party HQ."

31. On or about December 23, 2020, **BAKER** made a post to his Instagram account referencing the COVID-19 stimulus checks and captioned it "If you give 2000 we will just buy MOAR GUNZ (sic)." On or about December 25, 2020, **BAKER** made a post on his Instagram account with the caption "If you dont take up arms against trump them (sic) you are coward."

32. On December 29, 2020, **BAKER** made a post to his Instagram account advocating for individuals to stop training cops in Juijitsu, that cops kill civilians, and stated "We are hunting yall. The favelas will rise up and the mcdojos will burn during the revolution." Your affiant believes that **BAKER's** reference to "yall" in that post was referring to law enforcement officers.

33. On January 8, 2021, in response to the protest at the United States Capitol, **BAKER** posted to his YouTube account a video titled, "Terrorist kidnapping AP journalist." In the description of the video, **BAKER** writes "I have acquired a sponsor (Soros, you know, the antifa card was finally approved) and I and my donors will be offering cash rewards for information leading to the verified identification of an and every individual in this video. Don't worry, I wont (sic) ne (sic) going to the cops. We have decided to handle this ourselves because the dc cops let them in and all cops are infiltrated. There will be no faith in law enforcement

until every single department is shut down and replaced by new faces.” **BAKER** later commented on the video and stated: “Yall better hope the cops find you before we do cuz I believe in torturing prisoners for information. Yall better turn yourselves in cuz we dont intend to involve the cops.”

34. On that same date, another video posted by **BAKER** titled “cash rewards for info” shows the chaos at the US Capitol. In the description of that video **BAKER** writes: “I’ve been given access to a large sum of money and I will be offering rewards for any data that can be verified which leads to the identification of any and everyone in these videos.”



UNITED STATES CAPITOL  
Terrorists kidnapping AP journalist  
News • Jan 8, 2021

1 1 0 →



**Daniel Baker**  
600 subscribers

I have acquired a sponsor (Soros, you know, the antifa card was finally approved) and I and my donors will be offering cash rewards for information leading to the verified identification of any and every individual in this video. Dont worry, I wont ne going to the cops. we have decided to handle this ourselves because the dc cops let them in and all cops are infiltrated. there will be no faith in law enforcement until every single department is shut down and replaced by new faces.



**Daniel Baker** 1 day ago

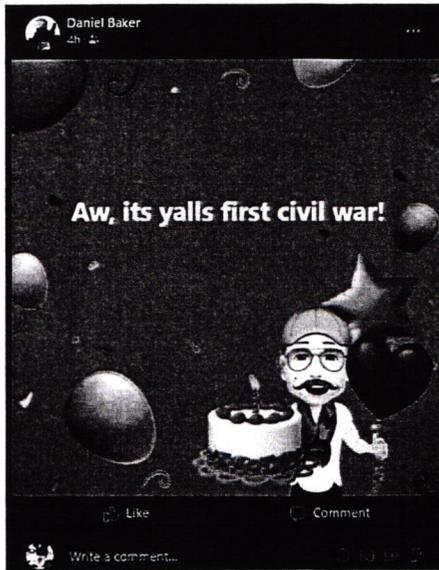
Yall better hope the cops find you before we do cuz I believe in torturing prisoners for information. Yall better turn yourselves in cuz we dont intend to involve the cops.

👍 🗨️ REPLY

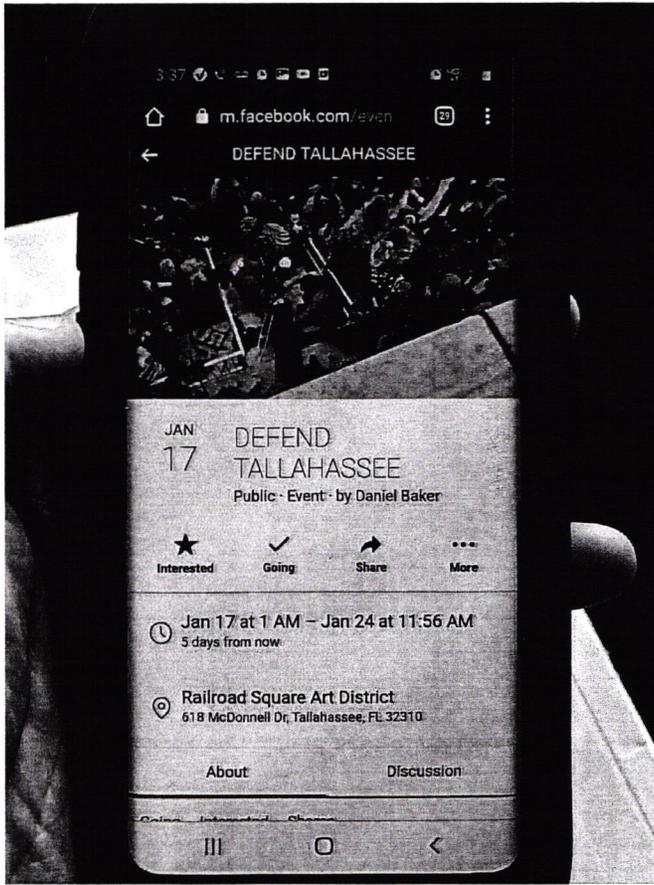
35. On January 9, 2021, **BAKER** posted a video titled “help us id the cops who let terrorists in.” In the description, **BAKER** writes: “these cops let terrorists into the Capitol building. I will send money to anyone who provides me with verifiable intel that can id these traitors.”

36. On January 12, 2021, after returning from a temporary Facebook profile ban, **BAKER** wrote the following: “Holy fucking shit my ban is over. Yall. So much has happened. Death to amerikka of course, fuck the president, current and elect.” Within the same time frame, **BAKER** changed his profile picture to him holding a Kalashnikov pattern rifle with a sweatshirt honoring Rob Grodt, an American anarchist killed fighting for the YPG.

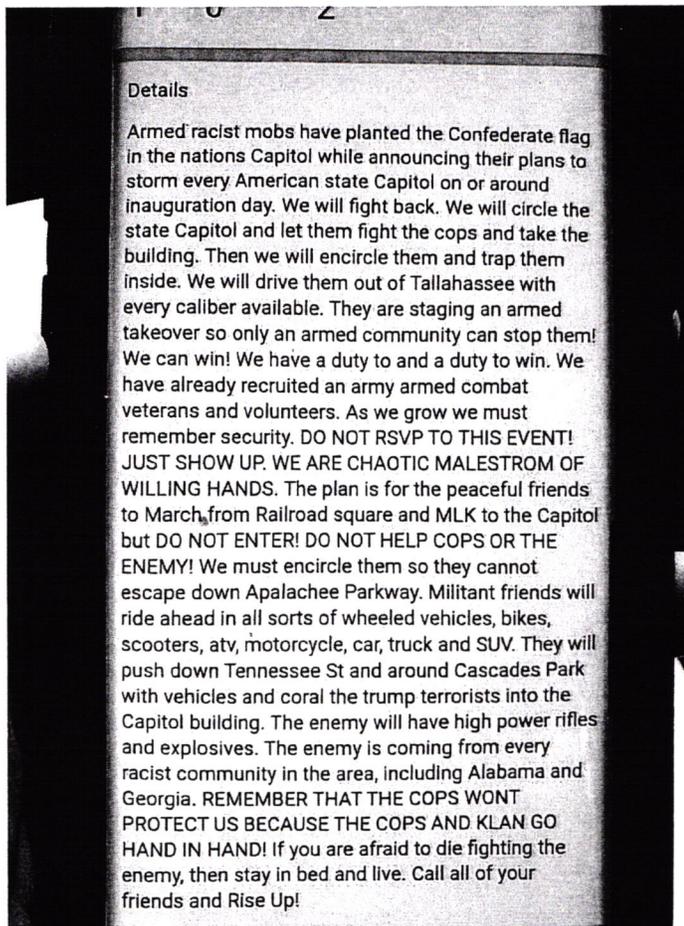
37. **BAKER** also changed his cover picture to several soldiers posing behind YPG and Antifa (Antifascist Action) flags holding more AK-47 style rifles. Lastly, within the same time span, **BAKER** posts: “Aw, it’s yalls (sic) first civil war!”



38. On January 12, 2021, **BAKER** created an event on Facebook titled “Defend Tallahassee.”

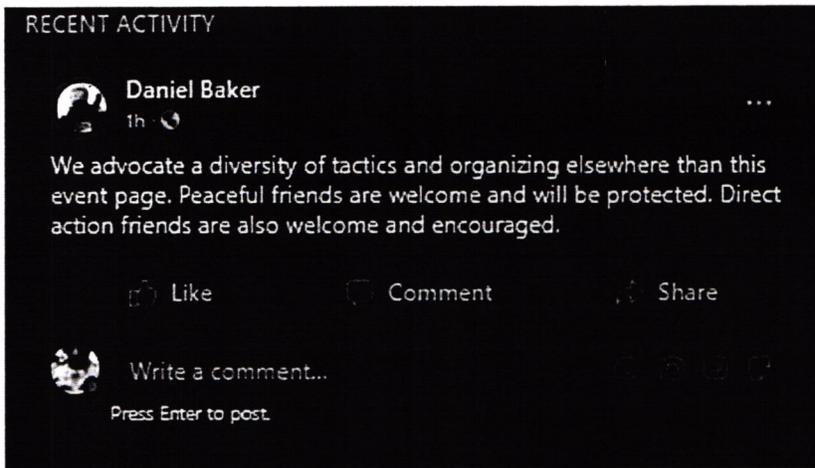


39. Under the details section of the “Defend Tallahassee” Facebook event page, **BAKER** posted the following on January 12, 2021:

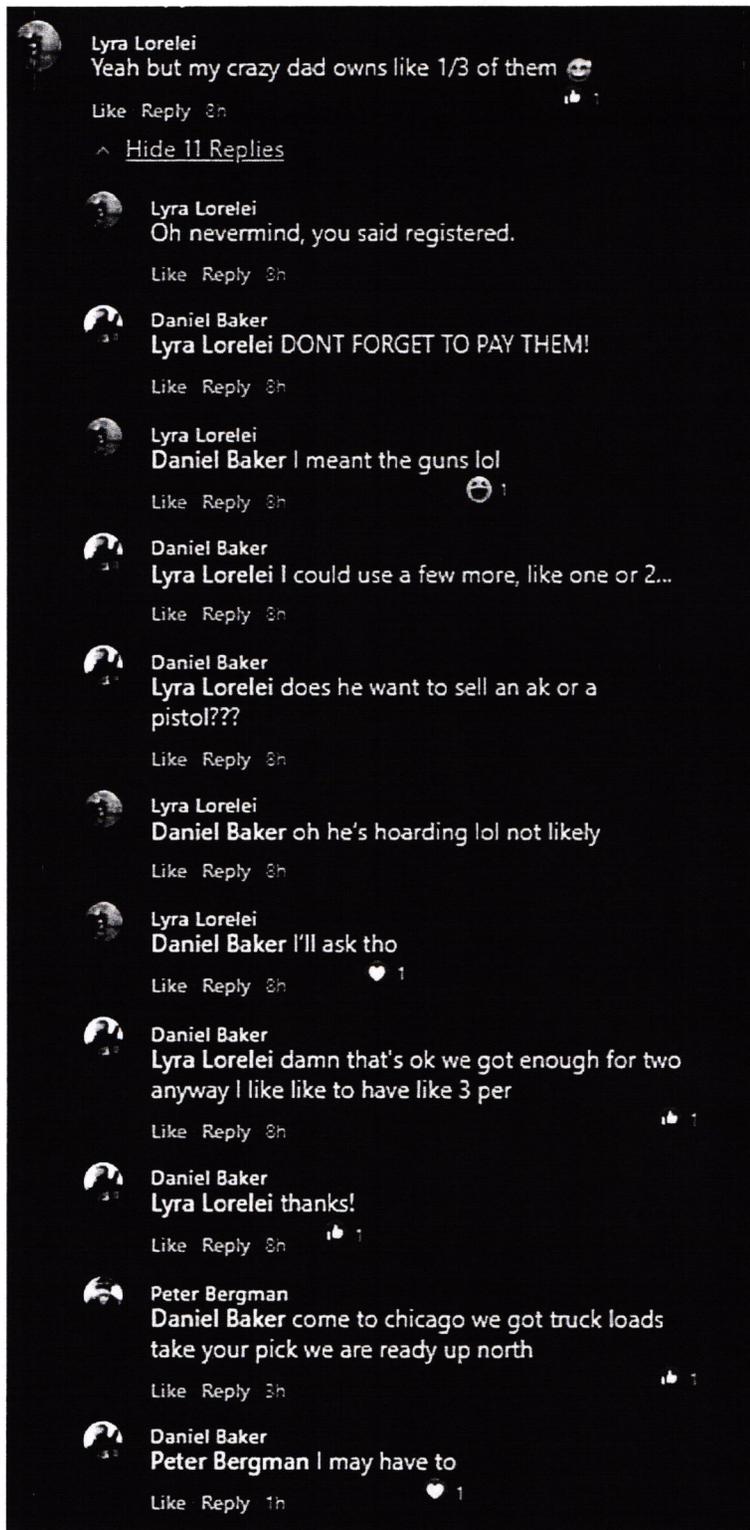


40. From my training and experience, your affiant knows that Facebook's networks and servers are hosted in California and that **BAKER** is currently residing in Tallahassee, Florida.

41. **BAKER** then posted: "We advocate a diversity of tactics and organizing elsewhere than this event page. Peaceful friends are welcome and will be protected. Direct action friends are also welcome and encouraged."

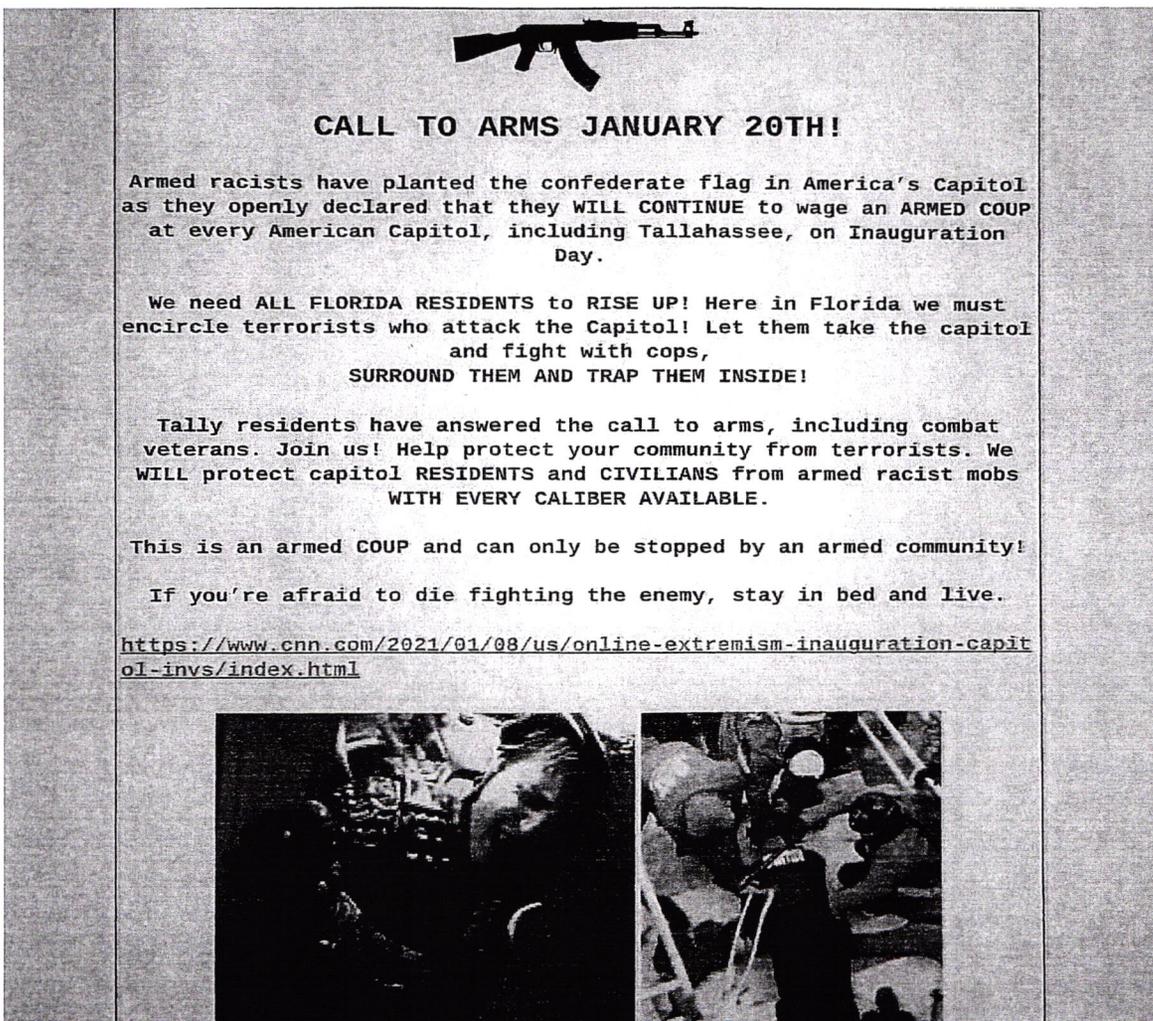


42. On January 14, 2021, **BAKER** posted several items to his social media as well as on the WTXL News page. Many of the posts on the WTXL page are mirrored from his own page. The first post on his page states: "Perspective for Floridians, There's only about 50,000 cops in Florida and about 433,000 guns. 5 and half million Trump supporters. Only 422 cops in Tallahassee. #wariscoming." The post contains pictures of registered guns in different states, State of Florida election results and Google searches showing Tallahassee Police Department, Florida Highway Patrol and Leon County Sheriff's Office sworn police officer numbers. Further down in the comments section of the post, **BAKER** asks his friend Lyra Lorelei if her dad may "want to sell an AK or pistol???"



43. On January 14, 2021, **BAKER** posted the “Call to Arms January 20th!” image below as a comment to a news article by a local Tallahassee-based television

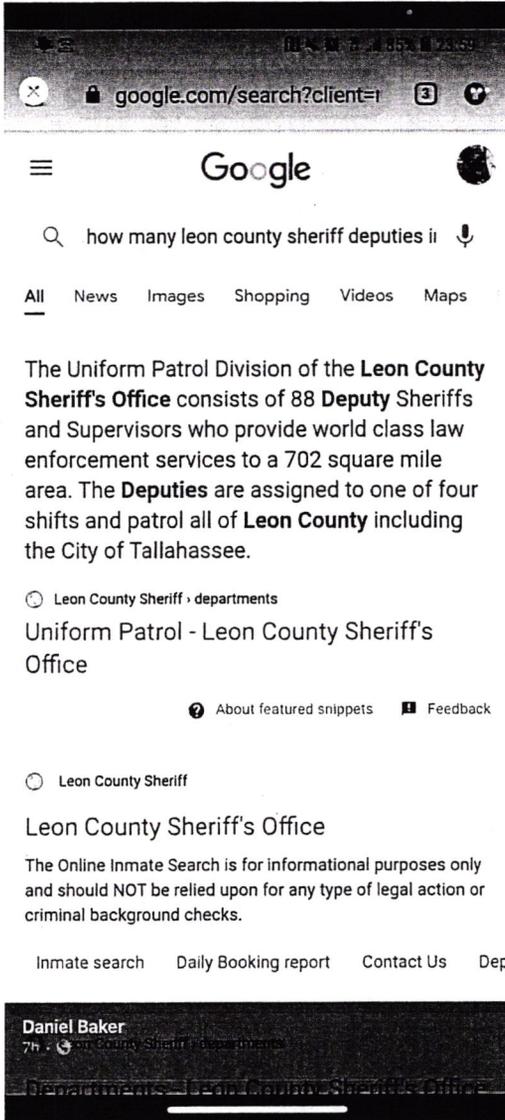
station. **BAKER's** comment was posted in response to a news article that stated TPD will be "fully staffed and prepared ahead of any potential Inauguration Day protests."

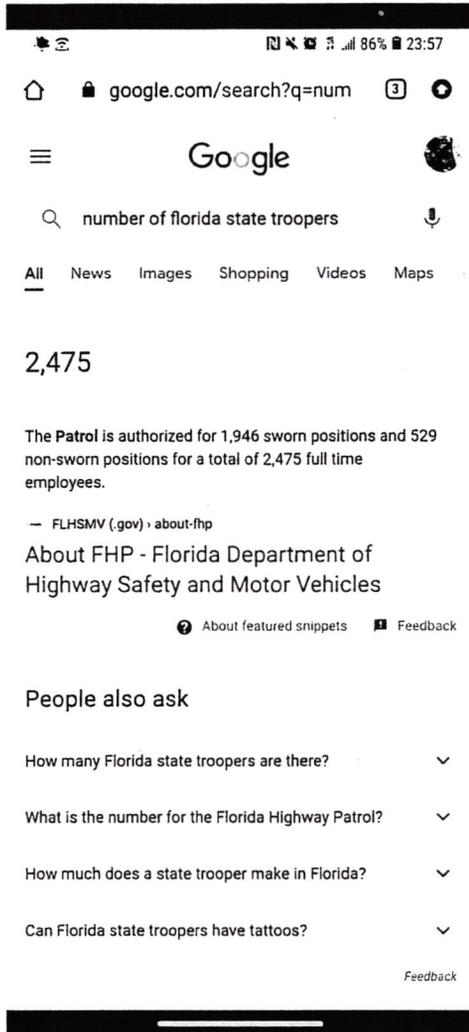


44. Right after the screenshot of the post, a YouTube video shows **BAKER** printing the flyers. The title of the video is "FLORIDA THIS IS A CALL TO ARMS."

45. These most recent posts on his page were also posted to the WTXL Facebook page. **BAKER** posted pictures of searches he conducted in an attempt to

determine how many law enforcement officers are employed by Leon County Sheriff's Office and by Florida Highway Patrol.





### III. CONCLUSION

WHEREFORE, for the reasons set forth above, your affiant respectfully submits that probable cause does exist and therefore request that the court approve this Criminal Complaint charging **DANIEL ALAN BAKER** with violating Title 18, United States Code, Section 875(c).

Respectfully submitted,



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Nicholas Marti  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me on this 14<sup>th</sup> day of January, 2021.



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CHARLES A. STAMPELOS  
UNITED STATES MAGISTRATE JUDGE