
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Honorable Cathy L. Waldor
 :
 :
 v. : Mag. No. 19-7572
 :
 : **CRIMINAL COMPLAINT**
 CARLOS ALEJANDRO TARICHE :
 :

I, David Brodie, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI") and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:



Special Agent David Brodie
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,
December 19, 2019 in Newark, New Jersey

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE

s/Cathy L. Waldor

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Interstate Communications Containing Threats to Injure)

On or about December 11, 2019, in the District of New Jersey and elsewhere, the defendant,

CARLOS ALEJANDRO TARICHE

knowingly and willfully did transmit in interstate and foreign commerce from the State of New York to the State of New Jersey, and other states, a communication via a posting to a public Twitter account, and the communication contained a threat to injure all Immigration and Customs Enforcement ("ICE") agents, specifically, "We need to kill all ICE agents," and "Why can't mass shootings occur at @ICEgov buildings them mfs need to get smoked,"

In violation of Title 18, United States Code, Section 875(c).

ATTACHMENT B

I, David Brodie am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about December 11, 2019, CARLOS ALEJANDRO TARICHE ("TARICHE") used one of his Twitter accounts ("Twitter Account-1") to post threats to officers with Immigration and Customs Enforcement ("ICE"). Specifically, TARICHE posted, "We need to kill all ICE agents." In a separate post on or about the same date, TARICHE posted, "Why can't mass shootings occur at @ICEgov buildings them mfs need to get smoked."

2. On or about December 12, 2019, TARICHE used Twitter Account-1 to compare his feelings to that of Elliot Rogder, who carried out a mass shooting at Isla Vista, California, murdering six people and shooting fourteen others.

3. On or around December 16, 2019, TARICHE used Twitter Account-1 to post, "So I just found out that last year I almost ended up in federal prison bc of some hotshot. Whole time I thought I was just paranoid."

4. In the profile description for Twitter Account-1, TARICHE wrote, "You might've heard I paint houses," a phrase that refers to murdering people and that was recently popularized by the movie, "The Irishman," which depicts a mafia hitman.

5. From at least on or about December 11, 2019, through on or about December 16, 2019, Twitter Account-1 was publicly accessible to anyone on Twitter. Starting on or about December 16, 2019, however, Twitter Account-1 was made private. On or about December 16, 2019, prior to Twitter Account-1 being made private, TARICHE posted, "Igh so imma have to put my shit on private for a bit cuz I nearly got suspended."

6. TARICHE had a Facebook account ("Facebook Account-1"), which was publicly accessible and featured photographs of TARICHE. The username associated with Facebook Account-1 was "Carlos Alejandro Tariche." Facebook Account-1 also featured a background photograph that depicted a screenshot of Twitter Account-1.

7. Further, law enforcement has determined that TARICHE appears to have posted a photograph of himself using a second Twitter account ("Twitter Account-2"), which was suspended by Twitter. On or about December 16, 2019, Twitter Account-1 posted, "RIP to [handle of Twitter Account-2]," by which TARICHE appeared to have been referencing the fact that Twitter suspended Twitter Account-2.

8. On or around December 12, 2019, TARICHE used Twitter Account-1 to post a statement indicating that he resided with his father, who was the leaseholder of an apartment in Edgewater, New Jersey ("Tariche's Residence"). TARICHE has posted to Twitter Account-1 using an internet account through Charter Communications in the name of TARICHE's brother that is registered to Tariche's Residence.

9. Logs of the Internet Protocol address associated with Twitter Account-1 show that the threatening communications posted on or about December 11, 2019, were sent from New York.