

AO 91 (Rev. 11/11) Criminal Complaint

FILED

UNITED STATES DISTRICT COURT
for the

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

District of New Mexico

FEB 22 2018

United States of America
v.

MATTHEW J. DYKMAN

Case No. 18-MJ-564 **CLERK**

John Russell Williams

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 02/15/2018 in the county of San Juan in the
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18 U.S.C. 875(c)	Interstate communications.

This criminal complaint is based on these facts:
See attached affidavit.

Continued on the attached sheet.

W. Monty Waldron

Complainant's signature

W. Monty Waldron, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: February 22, 2018

B. Paul Briones

Judge's signature

City and state: Farmington, New Mexico

B. Paul Briones, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEW MEXICO

AFFIDAVIT

I, the undersigned, being duly sworn, depose, and state as follows:

I am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation (FBI) and have been employed as such since 2007. I am currently assigned to the Albuquerque Division of the FBI, Farmington Resident Agency. I have primary investigative responsibility for investigating violent crimes such as homicide, robbery, arson, aggravated assault, and sexual assault. The information set forth in this affidavit has been derived from an investigation conducted by affiant, and/or communicated to me by other law enforcement officers.

1. On 02/16/2018, your affiant was notified by the San Juan County Sheriff's Office (SJCSO) of a threatening post that was made on Facebook by John Doe (juvenile). Your affiant learned that on the evening of 02/15/2018, the Farmington Police Department (FPD) received notification from a private citizen who reported a Facebook post that he/she had been made aware of. Law Enforcement Officers (LEOs) from the FPD responded to the residence of John Doe in Bloomfield, New Mexico, where he was contacted late on the night of 02/15/2018 and interviewed early on the morning of 02/16/2018 in regards to the threat.

2. On 02/16/2018, your affiant met with Detectives from the SJCSO. Your affiant was provided with a copy of a screen shot that was taken from John Doe's Facebook account. A review of the Facebook post stated the following: "**only 2 months into 2018 and already we got 29 school shootings. Fuck it my turn.**" In a reply to this post a

Facebook user with the user name of "John Williams" posted "Haha eketit (laughing emoji)." "John Williams" also had photographs of firearms posted on his Facebook page, although these photos appeared to have been previously posted, and not posted in response to the communication by John Doe.

3. On the morning of 02/16/2018, the SJCSO and Bloomfield Police Department (BPD) received notification of the above captioned Facebook threat from the principal of Bloomfield High School. SJCSO and BPD initiated an investigation and learned that John Doe is a former student at Charlie Y. Brown School in Bloomfield, New Mexico who had been expelled for destruction of property and for being intoxicated on school premises. As a result of the captioned Facebook post, students from the Charlie Y. Brown School were evacuated to the Bloomfield High School.

4. Detective Moreno from the BPD made contact with John Doe and his mother, T.J., and requested that John Doe speak with Law Enforcement at the BPD. John Doe agreed to speak with Law Enforcement, and his mother also agreed.

5. At the BPD, Detective Moreno read John Doe his "juvenile Miranda rights." John Doe stated that he understood his rights and agreed to talk with Detective Moreno. John Doe reported that on 02/15/2018, he heard news of the school shooter at Marjory Stoneman Douglas High School in Parkland, Florida and thought that the school shooting was funny. Shortly after hearing the news of the school shooting, he made the Facebook post that is captioned in paragraph 2 of this affidavit. John Doe stated that he does not have any guns and does not know anyone with a gun. John Doe told Detective Moreno that the previous evening, police officers from the FPD made contact with him at his

Bloomfield, NM residence. During this contact FPD was granted consent to search the residence and John Doe reported that they did not find any firearms.

6. On 02/16/2018, SJCSO Detective Courtney made contact with John Russell Williams, hereinafter referred to as WILLIAMS, with a year of birth of 1997, at his residence in Bloomfield, New Mexico. WILLIAMS is a friend of John Doe's whom Detective Courtney contacted due to a comment that he posted in response to John Doe's threatening Facebook post. As captioned above, in a reply to John Doe's Facebook post stating "only 2 months into 2018 and already we got 29 school shootings. Fuck it my turn," WILLIAMS had posted the reply, "**haha esketit** (laughing emoji)."

7. Investigation conducted by the SJCSO revealed that "esketit" is slang used by WILLIAMS and others that means "Let's do it" or "Let's get it." While at WILLIAMS' residence, officers asked WILLIAMS if he was aware of the Facebook post made by John Doe. A Law Enforcement Officer present at the location showed WILLIAMS an image of the post on the screen of his cellular telephone. WILLIAMS observed the Facebook post on the cellular telephone, smiled and laughed at the image. WILLIAMS agreed to speak with Detective Courtney at the BPD. While at the BPD, WILLIAMS confirmed that he posted the above captioned comment to John Doe's Facebook post. WILLIAMS reported that he used to be a student in the Bloomfield School system, but that he had not been to school in several years. WILLIAMS advised that he was close personal friends with John Doe and advised that he was aware of John Doe's Facebook post threatening to conduct a school shooting.

8. On 02/21/2018, your affiant spoke with FPD Detective Blea. Investigation conducted by FPD revealed that on 02/15/2018, John Doe accessed his Facebook account

from two different Internet Protocol (IP) addresses. On 02/15/2018, between 01:47 AM and 3:30 PM Mountain Standard Time (MST), John Doe's Facebook account was accessed using IP address 67.0.92.30. This IP address was issued to a Century Link customer who resides at 107 East Sycamore Avenue, Bloomfield, New Mexico. On 02/15/2018, between the hours of 3:30 PM and 4:42 PM MST, John Doe accessed his Facebook account via IP address 174.56.47.38. This IP address was issued by Comcast to a customer with the initials of C.B. who resides at 110 Rolling Rock Street, Bloomfield, New Mexico. Your affiant conducted a search of a Law Enforcement database and found that C.B. and WILLIAMS are both listed as being associated with the address of 110 Rolling Rock Street, Bloomfield, New Mexico.

9. Early in the morning of 02/16/2018, FPD Detective Blea spoke with John Doe at the FPD located in Farmington, New Mexico. At the FPD, John Doe advised that he was able to access the internet via Wi-Fi from the house of the individual who resides at 107 East Sycamore Avenue, Bloomfield, New Mexico and that this individual is in a relationship with John Doe's mother. John Doe reported that his friend WILLIAMS resides at the address of 110 Rolling Rock Street, Bloomfield, New Mexico. John Doe stated that the term "esketit" means "let's get it or something like that, just a shorter version." John Doe reported that WILLIAMS does not have any guns and that the pictures WILLIAMS posted of guns on his Facebook page are old.

10. On 02/21/2018, your affiant conducted an open source internet search for the term "esketit." The search revealed multiple results including from the website www.everipedia.org. The origin of the word esketit as defined on www.everipedia.org and is defined as follows: "The word was first circulated on social media by Lil Pump and

Smokepurpp in early 2016. Lil Pump is known for yelling the phrase at random times, including when shooting firearms. Esketit originally came from the phrase 'Let's get it' and has evolved to its current state today."

11. On 02/16/2018, your affiant conducted an open source internet search and found that Facebook has multiple data centers around the world with a primary data center in Prineville, Oregon. Based on the fact that Facebook is an internet based entity and due to the fact that data centers are located around the world, your affiant believes that there is probable cause that the Facebook post made by WILLIAMS in response to the post made by John Doe was conducted via interstate communication.

12. Based on the aforementioned facts, your affiant respectfully submits, that on or about 02/15/2018, WILLIAMS did transmit in interstate or foreign commerce a communication containing a threat to injure the person of another, specifically to conduct a school shooting, in violation of Title 18 United States Code, Section 875(c). This violation occurred in the County of San Juan, in the District of New Mexico.

13. This affidavit for criminal complaint has been reviewed and approved by Supervisory Assistant United States Attorney Kimberly Brawley.

W. Monty Waldron, Special Agent
Federal Bureau of Investigation
Farmington Resident Agency
Farmington, New Mexico

Subscribed and sworn before me this 22nd day of February, 2018.

B. Paul Briones
U.S. Magistrate Judge