

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Montana

United States of America

v.

Daniel Alan Verbanec

Case No.

MJ-25- ⁶⁵ -BU-KLD

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 2025 until present in the county of Gallatin in the
 District of Montana, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 875(c)

Interstate Threat

18 U.S.C. § 115(a)(1)(B), (b)(4)

Threat to Murder a United States Official

This criminal complaint is based on these facts:

in the Attached Affidavit, which is incorporated herein.

☒ Continued on the attached sheet.

/s/ Matthew J. Deurmeier
Complainant's signature

Matthew J. Deurmeier, FBI Special Agent

Printed name and title

Sworn to before me consistent with Fed. R. Crim. P. 4.1.

Date: Nov 12, 2025

Kathleen L. DeSoto
Judge's signature

City and state: Missula MT

Kathleen L. DeSoto, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL ALAN VERBANEC,

Defendant.

CRIMINAL COMPLAINT

MJ-25-⁶⁵-BU-KLD

INTERSTATE THREAT

(Count 1)

Title 18 U.S.C. § 875(c)

**(Penalty: Five years of imprisonment,
\$250,000 fine, and three years of
supervised release)**

**THREAT TO MURDER A UNITED
STATES OFFICIAL (Count 2)**

Title 18 U.S.C. § 115(a)(1)(B), (b)(4)

**(Penalty: 10 years of imprisonment,
\$250,000 fine, and three years of
supervised release)**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Matthew J. Deurmeier, am a Special Agent (SA) of the Federal Bureau of Investigation ("FBI"), being duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed by the FBI as a Special Agent for over fifteen years and am currently assigned to the FBI Bozeman Resident Agency in Bozeman, Montana. I have training and experience in conducting federal criminal investigations and have worked criminal matters involving terrorism, threats, violent criminal offenses, firearm

offenses, kidnappings, and civil rights matters. I have participated in numerous criminal investigations and have received extensive training and experience in the conduct of criminal investigations.

2. This affidavit is submitted in support of a criminal complaint charging Daniel Alan Verbanec with interstate communication of a threat, in violation of 18 U.S.C. § 875(c), and threat to murder a United States official, in violation of 18 U.S.C. § 115(a)(1)(B), (b)(4).

3. The facts set forth in this Affidavit are based upon my personal involvement in this investigation, training and experience, my review of relevant evidence, and information supplied to me by other law enforcement officers. This Affidavit is intended to show that there is probable cause to arrest and detain Verbanec for the crimes specified herein and does not purport to set forth all of my knowledge of, or investigation into, this matter.

SUMMARY OF INVESTIGATION AND PROBABLE CAUSE

4. In January 2025, a Special Agent with U.S. Capitol Police, Threat Assessment Section, contacted the FBI to report threatening communications sent via X addressed to U.S. Congressman Jim Jordan of Ohio. In the communication, the user, identified as “banec_dverbanec” stated, “I’m not sitting and I’m not waiting for s*** I’m going to kill every motherfucker here.” Shortly thereafter, the user posted, “I don’t give a

f*** Jim Jordan there's only one bartering piece and I'm holding it so you're dead m*****" then and some Asian w**** isn't trying to f***** kill your f***** niece Jim every f***** Republican dies shut the f*** yourself send your f***** money up your ass I'm going to f***** kill all of you."

5. The Agent submitted an emergency disclosure request (EDR) for the X account that yielded an email address of dverbanec@aol.com. The Agent submitted another EDR to Yahoo!, which identified the user as Dan Verbanec and a phone number 406-404-0744. Database queries for that information identified that individual with an address in Belgrade, Montana. Database queries yielded that U.S. Capitol Police had prior contact with Verbanec in 2018 regarding concerning internet postings directed at multiple Congressional members. FBI Headquarters submitted an investigative lead to the Bozeman Resident Agency, and it was assigned to me.

6. On February 4, 2025, I called phone number 406-404-0744. The caller identified himself as Dan Verbanec. Verbanec claimed the U.S. government had been trying to blackmail him for the past seven years, that he had been appointed by President Donald Trump in 2017 as a "special investigator," and he had been promised FBI credentials and a badge due to his invention. Verbanec claimed that that appointment was made via a coded message during a public speech made by President Trump. Verbanec stated he was currently homeless, was living out of his vehicle, and had been

fired two days earlier from his job as an Uber driver. Verbanec claimed his invention involved deciphering the code in which the universe is written and that every natural disaster or major news event was a result of bad actors within the government trying to access his invention. Verbanec claimed that public officials regularly communicate with him through coded messages in public speeches or via news broadcasts. He claimed that the government owed him for the intellectual property of his invention.

7. Verbanec claimed that the government was trying to kidnap and kill his family, including him, and that the entire federal government was complicit. During the call, Verbanec stated, “Jim Jordan will be tried and executed for treason as God is my fucking witness. That piece of shit backstabber.” When I asked why he hated Congressman Jordan, Verbanec replied, “I don’t hate Jim Jordan specifically. I hate every person in our government who’s been fucking me over for the past seven years.” Verbanec understood the punishment for treason stating, “If you commit and are found guilty of treason, then you should be executed for it.” When I asked if it mattered whether an individual was an elected official or not, Verbanec replied, “Nope, absolutely not. It should be double if you’re an elected official because you were chosen by your citizens to lead this country, not stab them in the back.”

8. During the phone call, I invited Verbanec to speak to me in person at the Bozeman Resident Agency. My purpose of meeting Verbanec in person was to identify

the vehicle he drove, to confirm if he had access to firearms, and to gauge his well-being. Verbanec agreed to do so and met with me that day. Verbanec arrived at the office in a black Buick Enclave sport-utility vehicle with Montana plates and did not have a firearm on his person. He claimed to not be in possession of any firearms. Verbanec stated, “I have a right to defend myself. When they threaten my kids, I have a right to tell Jordan ‘you do that again, I’m going to kill you.’” Verbanec reiterated that he was living out of his vehicle and rotated staying in various Town Pump parking lots each night in the Gallatin County area.

9. Verbanec claimed to have been previously contacted by the FBI regarding his threats toward U.S. Senator Jon Tester of Montana via X. He also recalled being contacted by a Secret Service agent at his residence approximately two years prior because of his threats directed at President Biden via X. Verbanec told me he recognized why the Secret Service would want to talk to him regarding threats directed at a President.

10. Verbanec claimed to have communicated online via coded messages with Tomi Lahren, a Fox News contributor. He claimed he traveled to her parents’ residence in South Dakota approximately four months prior and took a photograph of their front door and posted it to his Facebook account for Lahren to see, posting, “If you threaten anyone in my family again, I’m not going to knock on your parents’ front door, I’m going

to kick it in.” He claimed he traveled to their residence in South Dakota from Montana because he believed Lahren had threatened a girl he thought he was dating at that time.

11. Verbanec stated that the purpose of making the threats to Congressman Jordan was to scare him and get him to stop. Verbanec stated he had looked it up and that “a threat is something that does not give you a choice and I’ve specifically stated several times that if you don’t pay me I’m going to kill you, I’m not even going to do anything, the computer system is going to do it.” During the interview, Verbanec showed me multiple posts to his Facebook account that he believed was proof of the conspiracy. I observed that his Facebook user name was “Dan Verbanec.”

12. On September 4, 2025, U.S. Supreme Court Police contacted the FBI to report that Verbanec made threatening comments directed at Supreme Court Police protectees.

13. On October 16, 2025, Montana Highway Patrol, Executive Protection Detail, reported to the Montana State Fusion Center that they had had contact that day with Verbanec. Verbanec showed up at the state capitol and demanded to speak with Governor Greg Gianforte. Verbanec told the governor’s staff that the governor was trying to kill him and his family, the governor was responsible for the murder of Charlie Kirk, and that he had previously threatened the governor. Verbanec told staff members he would not leave the building unless he either spoke to the governor, or he was arrested

or forced out by police. Verbanec stated the governor was threatening him by his actions and Verbanec had the right to defend himself by whatever means. Verbanec was advised the governor was not in his office. Verbanec appeared to conduct an online query for Governor Gianforte's location, which showed the governor was attending a summit in Bozeman. Verbanec indicated to the officers his intent to travel to Bozeman to confront the governor. Officers escorted him from the building and notified the governor's protective detail.

14. Shortly thereafter, law enforcement conducted an open-source query of Verbanec's Facebook account and observed the following comments posted to the account:

- a. That day, Verbanec posted a photograph of the outside of the capitol building with the caption "Execute General Lloyd Austin for treason non-negotiable you have a f***** half an hour sir I want my billion dollars and my f***** badge or I am not leaving without a f***** police escort."
- b. Another photograph of the Capitol building taken next to a vehicle that read "Tick Tock sir have a nice f***** day."
- c. A photograph of a complaint form in which Verbanec commented "You're gestapo of police protection gave me this form Greg and

informed me that you're in the Bozeman you d***** coward I'll be back one way or another I want my f***** money right now."

- d. A screen capture of an email appearing to be an automated email message from Governor Gianforte's office to Verbanec. Verbanec posted in response "F*** you sir I will see you in person." As a comment to that post, Verbanec stated, "What do you think I'm going next Greg I know where you live in Bozeman mother f***** see you in an hour and a half." I am aware that the driving time from Helena to Bozeman is approximately one and one half hours.
- e. A screen capture of what appeared to be Google Map directions overlaid with a video from a news broadcast. The caption read, "F*** you 24 hours sir you have one f***** hour."

15. According to the governor's protective detail, Verbanec was not encountered in Bozeman that day.

16. I was notified of the incident at the Capitol from the Fusion Center. I then conducted an open-source query of Verbanec's Facebook account and observed that the account settings were open to the public. I reviewed the posts to the account from within approximately twenty-four hours of the incident at the state capitol and made the following observations:

- a. A screen capture of a video post by U.S. Senator Chuck Schumer in which Verbanec stated, “F*** you k*** you’re f***** dead.”
- b. A post that read, “Senator Chuck Schumer you are guilty of aiding in a batting [sic] a terrorist and committing treason and you have so no sign of making them stop threatening my children or my life execute Chuck Schumer and everyone in his f***** family for f***** treason.”
- c. A screen capture of a post by Senator Schumer in which Verbanec posted “F*** you Chuck I’m going to get a good dinner tonight and I’m going to kill that mother f***** tomorrow time’s up lying f***** Jew.”
- d. A post that read, “F*** you Chuck times up you’re getting executed for treason this isn’t a f***** joke execute Kendall Jenner and everyone in her family for treason.”
- e. A post that read, “Executed for treason,” and proceeded to list Senator Schumer and the names and positions of ten other Democratic U.S. Senators.
- f. A post that read, “All executed for treason,” and proceeded to list the names and positions of eight Republican U.S. Senators.

- g. A post of what appeared to be a Google map from Belgrade, Montana, to San Tan Valley, Arizona, with the comment, “Don’t worry Lindsay your sister’s next.”
- h. A post that read, “Execute John Kennedy Lindsey Graham Senator Cassidy ad everyone in their families for treason.”
- i. A post that read, “Somebody please tell Donald the whole masquerade ball joke is f***** over I’m going to kill every mother f***** at Fox Now have a nice f***** day.”
- j. A post in response to a post by the FBI that read, “Execute Dan Bongino and kash patel for treason and everyone in their families.” I am aware that Patel is the Director of the FBI and Bongino is the Deputy Director.
- k. A post that read, “Execute Barack Obama Michelle Obama and everyone in their family for treason.”
- l. A post that read, “Execute John tester Brian Schweitzer Max Baucus and Steve Danes for treason.” I am aware that Tester and Baucus are former U.S. Senators from Montana, Daines is the current Senator from Montana, and Schweitzer is the former governor of Montana.

- m. A post in response to a post by Turning Point USA that read, “Execute Erica Kirk and everyone in her family for treason.”
- n. A post that read, “Keep smiling Tomi I’m going to decorate her f***** walls with f***** blood.”
- o. A post that read, “Fox now you know what’s going to happen I’m on my way to Helena play that b***** speech again that you were mocking me with about a half an hour ago.”
- p. A post that read, “I wasn’t lying Mitch you getting executed for treason,” with two screen captures of what appeared to be U.S. Senator Mitch McConnell.

17. On November 4, 2025, I conducted an open-source query of Verbanec’s Facebook account and identified several photographs posted in late October 2025.

- a. On October 21, Verbanec posted a photograph of a building with a sign for “Fox 10 Studios” that read, “Have a nice night LMFAO.” I am aware that Fox 10 Studios is a news affiliate in Phoenix, Arizona.
- b. On October 23, Verbanec posted a photograph of a sign for Fox 10 Studios taken through a gate. The post read, “My money isn’t here tomorrow and somebody from your f***** business is getting the f*** beat up.”

- c. On October 27, Verbanec posted a photograph of a male walking on a sidewalk next to a building. The caption read, “I’m right outside your door b**** that’s your security officer who walks around the building that’s where the f*** I am.”
- d. There was a screen capture of what appeared to be Google Maps directions listing Black Canyon Highway and I-17. I am aware that those roads are located in Phoenix, Arizona.

18. On November 5, 2025, I conducted an FBI database check for Verbanec’s phone number, which yielded that Verbanec appeared to have made an approximately 27-minute telephone call to the FBI National Threat Operations Center (NTOC) on October 27, 2025. I reviewed an audio recording of that call.

19. In the call, Verbanec identified himself, confirmed his phone number, the vehicle he drove, and stated he was currently homeless. He told the operator he drove from Belgrade, Montana, to Phoenix, Arizona, and that he was currently parked outside Fox 10 Studios. Verbanec reiterated his grievance with the federal government previously relayed to me. He claimed he received coded messages through news broadcasts and that a Fox 10 broadcast the previous day mentioned him by name and threatened that the FBI would arrest him if he did not leave. Verbanec stated he was not armed with a firearm but that he was within his “second amendment right to legally

defend himself.” Verbanec claimed he was positioned outside the news studio for four to five days. He stated he did not want to trespass because that would be another crime.

20. During the call, Verbanec referenced the Fox Now broadcasters, stating, “The first one that walks out the door, I’m going to beat the shit out of because I can’t afford a lawyer. So that is the only way that I can get an attorney and make them stop threatening my kids. I am in my legal rights under the second amendment to defend myself and my family.”

21. Verbanec later stated during the call, “If I can’t get an attorney or someone to help me immediately, I mean today, I am waiting until one of their anchors who has been on Fox Now and has threatened my family comes out the gate, and then I’m going to rip them out of their car and I’m going to beat them until I get arrested. I’m not going to try to kill them, to be very specific, but I am going to assault them so that I can get a lawyer. Because there is no one who will help me.”

22. I contacted the Phoenix Police Department to query if there were any reports of encounters by the news station or of local law enforcement with Verbanec. The department had no record of such contact other than NTOC notifying the agency of the phone call after it was terminated.

CONCLUSION

23. Based on the information contained in this Affidavit, there is probable cause to believe that Daniel Alan Verbanec committed interstate threats and threats against United States officials.

15/ Matthew J. Deurmeier

Matthew J. Deurmeier, Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me consistent with Fed. R. Crim. P.

4.1 on this 15th day of November, 2025.

Kathleen L. DeSoto

Kathleen L. DeSoto
United States Magistrate Judge