

UNITED STATES DISTRICT COURT

for the
District of Montana

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*Samsung Galaxy S24 Cellular Phone, IMEI
356984190903331 Belonging to Daniel VerbanecCase No. MJ-25- ⁶⁶ -BU-KLD

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A, which is incorporated herein.

located in the _____ District of _____ Montana _____, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, which is incorporated herein.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 875(c)	Interstate Communication of Threat
18 U.S.C. § 115(a)(1)(B), (b)	Threats to Murder United States Officials
(4)	

The application is based on these facts:

See Attached Affidavit, which is incorporated herein.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days *(give exact ending date if more than 30 days: _____)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

15/ Matthew J. Deurmeier*Applicant's signature*

Matthew J. Deurmeier, FBI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
phone *(specify reliable electronic means).*

Date:

Dec 2, 2025Kathleen L. DeSoto
Judge's signature

City and state:

Missoula MT

Hon. Kathleen L. DeSoto, U.S. Magistrate Judge

Printed name and title

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

IN THE MATTER OF THE SEARCH
OF:

Samsung Galaxy S24 Cellular Phone,
IMEI 356984190903331 Belonging to
Daniel Verbanec

Case No. MJ-25-66-BU-KLD

AFFIDAVIT IN SUPPORT OF A SEARCH WARRANT

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 15 years. I am currently assigned to the Bozeman Resident Agency in Bozeman, Montana. I have training and experience in conducting federal criminal investigations and have worked criminal matters involving terrorism, violent criminal offenses, threats, firearms offenses, and civil rights matters. In addition, I am assigned to conduct national security investigations as a member of the Joint Terrorism Task Force (“JTTF”). I have participated in numerous national security investigations and have received extensive training and experience in the conduct of national security investigations involving domestic and international terrorism.

I have executed operations involving numerous search warrants related to multiple criminal investigations.

2. I submit this Affidavit under Rule 41 of the Federal Rules of Criminal Procedure in support of an Application for a Search Warrant authorizing a search of the electronic device detailed in Attachment A, seized from Daniel Verbanec at the time of his arrest on November 17, 2025, at the Bozeman Resident Agency, that constitute fruits, evidence and instrumentalities of the federal offenses more specifically described in Attachment B and below. As discussed below, I have probable cause to believe that Daniel Verbanec utilized his smart phone to commit the crimes of Interstate Communication of a Threat, in violation of 18 U.S.C. § 875(c), and Threats to Murder United States Officials, in violation of 18 U.S.C. § 115(a)(1)(B), (b)(4).

3. The statements in this affidavit are based on my personal observations, training and experience, investigation of this matter, and information obtained from other agents, law enforcement officers, and witnesses. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to search the property described in this affidavit for evidence, fruits, and instrumentalities of violations of federal law as stated above.

DEFINITIONS

4. The following non-exhaustive list of definitions applies to this Affidavit and Attachments A and B:

a. “Computer” as used herein, is defined pursuant to 18 U.S.C. § 1030(e)(1), as “an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device.”

b. “Computer hardware” as used herein, consists of all equipment which can receive, capture, collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, or similar computer impulses or data. Computer hardware includes any data-processing devices (such as, central processing units, internal and peripheral storage devices, external hard drives, and other memory or optical storage devices); peripheral input/output devices (such as, keyboards, printers, video display monitors, and related communications devices such as cables and connections), as well as any devices, mechanisms, or parts that can be used to restrict access to computer hardware and software (such as physical keys and locks and dongles or other electronic access devices).

g. “Computer software” as used herein, is digital information

which can be interpreted by a computer and any of its related components to direct the way they work. Computer software is stored in electronic, magnetic, or other digital form. It commonly includes programs to run operating systems, applications, and utilities.

h. “Computer-related documentation” as used herein, consists of written, recorded, printed, or electronically stored material which explains or illustrates how to configure or use computer hardware, computer software, or other related items.

i. “Computer passwords and data security devices” as used herein, consist of information or items designed to restrict access to or hide computer software, documentation, or data. Data security devices may consist of hardware, software, or other programming code. A password (a string of alpha-numeric characters) usually operates a sort of digital key to “unlock” particular data security devices. Data security hardware may include encryption devices, chips, dongles, and circuit boards. Data security software of digital code may include programming code that creates “test” keys or “hot” keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or “booby-trap” protected data to make it inaccessible or unusable, as well as reverse the progress to restore it.

j. “Internet Service Providers” or “ISPs” as used herein, is defined as a business that allows a user to dial into or link through its computers allowing the user to connect to the internet for a fee. Typically, the customer pays a monthly fee and the ISP supplies software that enables the customer to connect to the internet by a modem or similar device attached to or installed in a computer.

k. “ISP Records” are records maintained by ISPs pertaining to their subscribers (regardless of whether those subscribers are individuals or entities). These records may include account application information, subscriber and billing information, account access information (often times in the form of log files), email communications, information concerning content uploaded and/or stored on or via the ISP’s servers, and other information, which may be stored both in computer data format and in written or printed record format. ISPs reserve and/or maintain computer disk storage space on their computer system for their subscribers’ use. This service by ISPs allows for both temporary and long-term storage of electronic communications and many other types of electronic data and files.

l. “Internet Protocol address” or “IP address” as used herein, is defined as a numeric address of a machine in the format used on the internet. There are two standards for IP addresses: IP Version 4 (IPv4) and IP Version

6 (IPv6). The IPv4 address is a unique number consisting of four blocks of binary numbers as in 123.456.789.001, for example. An IPv6 address is expressed by eight groups of hexadecimal numbers separated by colons, as in 2001:cdba:0000:0000:0000:0000:3257:9652, for example. Groups of numbers that are all zeros are sometimes omitted to save space.

m. The terms “records,” “documents,” and “materials,” as used herein, include all information recorded in any form, visual or oral, and by any means including unallocated or deleted data.

n. “Digital device” includes any electronic system or device capable of storing and/or processing data in digital form, including: computers; central processing units; personal digital assistants; wireless communication devices such as mobile or cellular phones; digital cameras; peripheral input/output devices such as printers, scanners, monitors, and drives intended for removable media; related computer communications devices such as modems, routers, network access devices, and connections; storage media such as internal and external hard drives, and flash memory devices; and security devices.

o. “Image” or “forensic copy” refers to an accurate reproduction of information contained on an original physical item, yet is independent of the electronic storage device.

PROBABLE CAUSE

5. 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.”

6. 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! that 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.

7. 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, he had been appointed by President Donald Trump in 2017 as a “special investigator,” and had been promised FBI credentials and a badge due to his invention. Verbanec claimed his appointment was made via a coded message during a public speech by President Trump. Verbanec stated he was currently homeless, was living out of his vehicle, and was 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.

8. Verbanec claimed that the government was trying to kidnap and kill him, his family, and 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.”

9. 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 gas station parking lots each night in the Gallatin County area.

10. 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.

11. 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." Verbanec 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.

12. Verbanec stated the purpose of making the threats to Congressman Jordan was to scare him and get him to stop. Verbanec stated he 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 on his cell phone multiple posts to his Facebook account that he believed was proof of the conspiracy. I observed that his Facebook user name was "Dan Verbanec."

13. 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.

14. On October 16, 2025, Montana Highway Patrol, Executive Protection Detail, reported to the Montana State Fusion Center 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 he had previously threatened the governor. Verbanec told staff members that he would not leave the building unless he either spoke to the governor, or he was arrested or forced out by police. Verbanec stated that the governor was threatening him by his actions and Verbanec had the right to defend himself by whatever means. Verbanec was advised that the governor was not in his office. Verbanec appeared to conduct an online query via his cell phone for Governor Gianforte's location, which showed that 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.

15. 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.”

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

17. 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.

18. 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.

19. 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.

20. 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 had driven 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 had 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 to have been positioned outside the news studio for four to five days. He stated he did not want to trespass because that would be another crime.

21. 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.”

22. 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 then, 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.”

23. I contacted the Phoenix Police Department to query if there was 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.

24. On November 12, 2025, I telephonically swore out an affidavit in support of a criminal complaint and an arrest warrant was issued for Verbanec.

25. On November 13, 2025, I conducted an open-source query of Verbanec’s Facebook account and observed the following:

a. In one post appearing to be from earlier that week, Verbanec stated

“Lie all you want Mike Johnson I’m cutting yours off and making you f***** eat it.”

- b. In one post dated November 4, 2025, that appeared to be a response to a post by the FBI Facebook account, Verbanec stated, “Go f*** yourself Patel, you’re getting raped the f*** to death for treason so is your girlfriend.”
- c. In another post dated on November 4, 2025, Verbanec stated, “Congratulations Chuck your execution is going to be done in a private room by me personally non-negotiable.”
- d. In another post dated on November 4, 2025, Verbanec stated, “You can cut the b***** every member of Congress is getting executed for treason if I don’t have my billion dollars by tomorrow morning so is every f***** buddy and every f***** one of their f***** families I don’t give a f*** what party of your affiliated with have a nice f***** night if you don’t want to be raped to death by large mechanical hydraulically powered pumps you will do it right f**** now.”

26. On November 17, 2025, I telephonically contacted Verbanec at phone number 406-404-0744 and he replied via text message. He agreed to meet with me at the Bozeman RA to discuss his issues with public officials.

27. During an interview that day, Verbanec admitted to making the statements on his Facebook accounts directed at federal elected officials to include U.S. Senator Chuck Schumer and other officials to include FBI Director Kash Patel. Verbanec admitted that he had no intention of traveling to hurt the officials, but that the purpose of his statements was to scare the officials into stopping their activity of what he perceived to be harassing and threatening behavior.

28. Regarding his travel to the Montana State Capitol to confront Governor Gianforte in October 2025, Verbanec admitted to taking photographs and videos on his phone outside and inside of the building and posting them to his Facebook account. He also stated he looked up on his cell phone where Gianforte lived in Bozeman prior to driving to Bozeman.

29. When I asked about his threat via Facebook directed at Erica Kirk and her family, Verbanec stated he only intended to scare her. He then went on his phone and pulled up messages he had sent to the “Turning Point USA” Instagram account. Verbanec showed me the messages on his phone and consented to me taking photographs of that message chain.

- a. One message read, “Yeah, that’s right sell your soul to Satan all for money and political power just like your f***** w***** Donald Trump does burn in hell b*****.”
- b. One message read, “If they give me what I’ve demanded and what

I'm owed like all the land Bill Gates zones [sic] and Ted Turner then no I wouldn't execute anyone's children but they want me to back down first and that sure as f*** is not going to happen."

- c. One message read, "Money on Monday or I will execute you for treason."


30. During the interview, I asked Verbanec about the threatening posts referencing Tomi Lahren and her family. Verbanec previously said in February that he had traveled to Lahren's parent's residence in South Dakota. He stated he had taken a photograph with his cell phone of the front of their property and posted it to his account for the purpose of scaring Lahren into what he perceived to be threatening coded messages. Verbanec used his phone to look up the photograph and showed it to me. He consented to me taking a photograph of his phone. I observed that the date on the photograph was July 14, 2024, and the time stamp was 9:26 pm and it listed "Black Hills." The photograph appeared to be taken in the dark of a fence post with an American flag and numbers on the post indicating a residence address.

31. Upon conclusion of the interview, myself and another FBI Agent executed an arrest warrant on Verbanec and seized the cellular phone on his person as evidence.


CONCLUSION

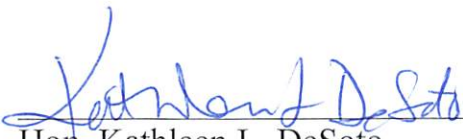
32. Based on the foregoing, I have probable cause that Daniel Verbanec facilitated interstate communications of threats, in violation of 18 U.S.C. § 875(c), and has been engaged in threats to United States Officials, in violation of 18 U.S.C. § 115(a)(1)(B),(b)(4).

33. I respectfully request that a warrant be issued to search the Samsung Galaxy S24 cellular phone, and seize fruits, and instrumentalities of violations of 18 U.S.C. §§ 875(c) and 18 U.S.C. § 115(a)(1)(B),(b)(4) as described in Attachment B.



Matthew J. Deurmeier, Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN consistent with Fed. R. Crim. P. 4.1 on this
 day of December, 2025.



Hon. Kathleen L. DeSoto
United States Magistrate Judge

ATTACHMENT A

The property to be searched, the Device, is as follows:

Black Samsung Galaxy S24 cellular phone, IMEI 356984190903331, S/N RFCX80S69SA



ATTACHMENT B
Particular Things to be Searched for and Seized

All items to be seized, as itemized below, are expected to contain evidence that demonstrates the motive, opportunity, intent, modus operandi, preparation, plan, knowledge, actual documentation of the execution of the scheme or identity of any perpetrator or victims related to the crimes set forth in the probable cause statement of this affidavit or are expected to be fruits or instrumentalities of these crimes.

In the search of the property described in Attachment A, the FBI seeks to identify and seize evidence of the crimes described herein to include the following items:

1. All items, records, and information on the Device described in Attachment A that relate to violations of 18 U.S.C. §§ 875(c), Interstate Communication of a Threat, and 115(a)(1)(B),(b)(4), Threats to Murder a United States Official;
2. All files, data, records, images, SMS text messages, MMS text messages, call logs, or videos related to interstate communication of a threat or threats to murder a United States official;
3. All data and records relating to social media websites, including but not limited to Facebook, Snapchat, Instagram, X, Reddit, etc. related to interstate communication of a threat or threats to murder a United States official;
4. All data and records relating to smartphone applications, such as Facebook, Facebook Messenger, TextNow, WhatsApp, WeChat, ProtonMail, Bluesky Social and other similar applications used to facilitate voice-over internet protocol voice calling or text messaging or chat communications related to interstate communications of a threat or threats to murder a United States official;
5. Evidence of who used, owned or controlled the device at the time the things described in the warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, e-mail, e-mail contacts, chat and instant messaging logs, photographs, and correspondence;

6. Evidence of the dates and times the device was used;
7. Passwords, encryption keys, and other access devices that may be necessary to access the device; and
8. Records of or information about Internet Protocol addresses or GPS coordinates used by the device.