

AO (Rev. 5/85) Criminal Complaint

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER: 2:12-mj-1132 DWF

CHRISTOPHER DAVIES

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 26, 2012, in Lee County, in the Middle District of Florida, the defendant did,

knowingly and willfully make a threat to take the life or, or to inflict bodily harm upon, the President of the United States,

in violation of Title 18, United States Code, Section 871.

I further state that I am a Special Agent with the United States Secret Service, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


Signature of Complainant
James Mundo, Special Agent
United States Secret Service

Sworn to before me and subscribed in my presence,

July 27, 2012

at Fort Myers, Florida

DOUGLAS N. FRAZIER
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

Affidavit

I, James V. Mundo, being duly sworn, hereby depose and state as follows:

I am a Special Agent with the United States Secret Service (USSS), and have been so employed since March, 1996. I have a Bachelor of Science degree in Law Enforcement Administration from Western Illinois University and a Master's Degree in Public Administration from Governor's State University. I have received training at the Federal Law Enforcement Training Center and the United States Secret Service Rowley Training Center in the techniques and methodology of general law enforcement and criminal investigations, to include threats against the President of the United States and other protectees of the USSS.

The information contained in this affidavit is based, in part, on my personal knowledge and observations during the course of this investigation, as well as information provided to me by cooperating sources and other law enforcement agents/officers; additionally, this affidavit is based upon my training and experience as well as that of other law enforcement agents/officers working with me in this investigation. This affidavit is intended to show that there is sufficient probable cause for a criminal complaint and does not purport to set forth all of the information about which I, or collectively the other agents involved in this investigation, have knowledge.

This affidavit is provided in support of an application of a criminal complaint charging Christopher Davies with violation of Title 18, United States Code, Section 871.

The Investigation

Christopher Michael Davies (DAVIES) is eighteen years old and is currently housed in the Lee County Jail. DAVIES was arrested on May 24, 2012, and accused of Criminal Mischief, \$1000 or more Wearing a Mask or Hood, a second degree felony, in violation of Florida Statute 806.13 and related charges. DAVIES is in custody awaiting trial.

On July 26, 2012, DAVIES threatened to kill the President of the United States, Barack Obama. While housed in the Lee County Jail, DAVIES wrote a letter to Jail personnel, stating "when I am released from the Lee County Jail I am going to Kill President Barrack H. Obama..." The word "Kill" was underlined three times. The letter also stated, "P.S: Take this letter as a joke if you want to and you'll have a presidents blood on your hands." DAVIES also signed the letter "Chris Davies."

On July 26, 2012, I was notified of this threat by Lee County Jail personnel. On the same day, Florida Department of Law Enforcement Special Agent Grant Wagner and I interviewed DAVIES at the Lee County Jail. DAVIES admitted writing the letter and giving it to jail personnel to deliver to Captain Brock, the Jail Commander.

In addition to admitting making the threat against the President's life, DAVIES admitted that he wanted to kill President Obama and had thought about killing the President for "a while." DAVIES was unable to detail how or where he would carry out this act but stated that he would use a rifle and could obtain one easily.

Applicable Law

Title 18, United States Code, Section 871 provides that:

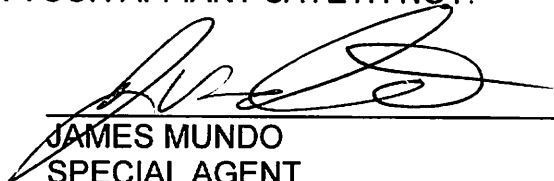
(a) Whoever knowingly and willfully deposits for conveyance in the mail or for a delivery from any post office or by any letter carrier any letter, paper, writing, print, missive, or document containing any threat to take the life of, to kidnap, or to inflict bodily harm upon the President of the United States, the President-elect, the Vice President or other officer next in the order of succession to the office of President of the United States, or the Vice President-elect, or knowingly and willfully otherwise makes any such threat against the President, President-elect, Vice President or other officer next in the order of succession to the office of President, or Vice President-elect, shall be fined under this title or imprisoned not more than five years, or both.

Conclusion

Based upon the investigation to date, your affiant respectfully submits that there is probable cause to believe that on July 26, 2012, in Lee County, Florida, DAVIES did knowingly and willfully make a threat to take the life of, or to inflict bodily harm upon, the President of the United States in violation of Title 18, United States Code, Section 871.

WHEREFORE, your affiant requests this Court issue an arrest warrant for Christopher DAVIES for violation of Title 18, United States Code, Section 871.

FURTHER YOUR AFFIANT SAYETH NOT.



JAMES MUNDO
SPECIAL AGENT
UNITED STATES SECRET SERVICE

Subscribed and sworn to me before this 27th day of July, 2012.



DOUGLAS N. FRAZIER
UNITED STATES MAGISTRATE JUDGE