

AO 91 (Rev. 11/11) Criminal Complaint (approved by AUSA)

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America)

v.)

Gavin Lee Casdorph)

Case No. 18-1994-M

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 May 5, 2018 in the county of Northampton in the Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

Title 18, United States Code, Section 844(e)

Willfully and maliciously making threats and conveying false information concerning an attempt to kill individuals and damage and destroy buildings by means of an explosive.

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Eddie Garcia II (signature)

Complainant's signature

Eddie Garcia II

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/12/2018

Henry S. Perkin (signature)

Judge's signature

City and state: Allentown, Pa.

HENRY S. PERKIN

Printed name and title

AFFIDAVIT

I, Eddie Garcia II, being first duly sworn, hereby depose and state as follows:

I. BACKGROUND

1. I have been employed as a Special Agent of the FBI since March 6, 2016. I am currently assigned to the Allentown Resident Agency of the Philadelphia Division. Prior to joining the FBI, I was employed as an Immigration Enforcement Agent and Deportation Officer with the Department of Homeland Security from January 2007 to March 2016. As a Special Agent I have received instruction and on-the-job training in various aspects of law enforcement. During my employment with the FBI, I have participated in investigations involving international and domestic terrorism, bank robberies, drug trafficking, financial institution fraud, human trafficking, and other federal violations. In the course of those investigations, I have conducted consensual body recordings, employed the use of electronic surveillance techniques, have executed numerous search and arrest warrants, conducted surveillance, and secured other relevant information utilizing other investigative techniques.

2. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. I make this affidavit in support of an arrest warrant for GAVIN CASDORPH for violations of Title 18, United States Code, Section 844(e), arising from threats that he made on May 5, 2018, to detonate bombs and kill innocent victims on the campus of Lafayette College in Easton, Pennsylvania.

4. The statements in this affidavit are based in part on information provided by myself and other Special Agents and colleagues employed by the Federal Bureau of Investigation. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I

have set forth only the facts that I believe are necessary to establish probable cause for the arrest of this defendant.

II. APPLICABLE STATUTES

5. Title 18, United States Code, Section 844(e) provides that "... (w)hoever, through the use of the mail, telephone, telegraph, or other instrument of interstate or foreign commerce, or in or affecting interstate or foreign commerce, willfully makes any threat, or maliciously conveys false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive shall be imprisoned for not more than 10 years or fined under this title, or both."

III. FACTS

6. Lafayette College is a private liberal arts college based in Easton, Pennsylvania. Approximately 2,450 students are enrolled at the school. On May 5, 2018, Twitter user "BdanJafarSaleem" ("the subject") posted several threatening tweets, including a link to a Pastebin¹ letter, in which he claimed to have placed explosive devices around the Lafayette College campus in order to "inflict the utmost damage possible." The letter indicated that the subject had recently lost his grandfather, that his girlfriend had broken up with him; that he found faith and healing in Allah and that he pledged allegiance to ISIS. In addition to the threats posted on Twitter, the same threats were also e-mailed directly to numerous Lafayette College school officials using a Yahoo email account on May 5, 2018, at 8:24 PM. As a result of these threats, Lafayette College took substantial additional steps to guarantee the safety of its students, including moving the location of the college's graduation ceremonies.

7. Investigation into the Twitter account BdanJafarSaleem revealed telephone

¹ Pastebin is an online content hosting service where users can store plain text.

number 239-258-4259 was associated with that account and used to activate it. Further investigation of the telephone number 239-258-4259 found it associated with a business which provides a service which allows individuals/users to verify social media and email accounts without providing their own phone numbers to do so. On July 2, 2018, Person 1 was interviewed regarding that telephone number. He indicated he worked along with a Russian for that company. Users can go to the website of the service, create an account, place funds into the account, and then receive a verification for them to use in opening the social media or email accounts of their choosing. The verification is in a form which allows the creator of these accounts to remain anonymous.

8. The owners of this service provided information revealing that the individual who had used the service to open the BdanJafarSaleem account had also used the service to open several other Twitter accounts around the same time, all using variations of the name of Person 2. Specifically, on May 5, 2018, the date of the threats, at 7 PM, the subject attempted to create a Twitter account with a handle comprised of Person 2's first then last names. At 7:15 PM the subject attempted to create a Twitter account using Person 2's last then first name. At 7:30 PM the subject successfully created a Twitter account using Person 2's first then last name followed by "PA 1" and began to "follow" a variety of people and businesses from Lafayette College and the surrounding area. Finally, at 7:45 PM the subject successfully created the Twitter account "BdanJafarSaleem" that was used to make the threat. This account followed many of the same accounts that the PA 1 account did.

9. Further investigation revealed that at the time of the threats, Person 2 was enrolled at Lafayette College. On December 6, 2018, Person 2 was interviewed by law enforcement at his residence in Middleburg, VA.. He immediately told the interviewers that he could help with the investigation into threats at Lafayette College and that he knew all about it. He said he was

playing an online game called "Counterstrike" on the day of the threats, and that he and the other players were using Discord² to chat and communicate. He said that he got into an online argument with an individual who goes by the screen name of "Neuroscientist" and who is known for "Doxing" people online.³ Person 2 said he knew another person from the Discord channel named "Gavin" LNU, who was friends with "David" LNU. David LNU told Person 2 that Gavin was involved in the "Swatting" at Lafayette College.⁴

10. On December 11, 2018, GAVIN CASDORPH was interviewed at his residence located at 12411 Hopa Circle, Anchorage, Alaska, by FBI Special Agents Elliot Peterson and Joshua Rongitsch. A search warrant was executed at the same address. At the beginning of the interview, CASDORPH was advised of his rights and he agreed to speak with the Special Agents. After waiving his rights CASDORPH admitted that he had made the threats against Lafayette College. He explained that he was in the Discord channel with "Neuroscientist" on May 5, 2018, the date of the threats, when there was an argument between "Neuroscientist" and Person 2. CASDORPH said that "Neuroscientist" asked CASDORPH to send in an anonymous threat to Lafayette College. CASDORPH said that to set up the anonymous account to make the threats against Lafayette College, he purchased a telephone number from a Russian website. He then used that telephone number to create a Twitter account. CASDORPH explained that he used TOR⁵ while creating the Twitter account to shield his identity. CASDORPH made the

² Discord is a VoIP platform designed for video gaming communities, that specializes in communication between users in a chat channel.

³ Doxing is the Internet-based practice of researching and broadcasting private or identifiable information (especially personally identifiable information) about an individual or organization.

⁴ Swatting is the harassment tactic of deceiving an emergency service (via such means as hoaxing an emergency services dispatcher) into sending a police and emergency service response team to another person's address.

⁵ TOR is software enabling anonymous online communication. The name is derived from an acronym for the original software project name "The Onion Router." TOR directs Internet traffic through a free, worldwide, volunteer overlay network consisting of more than seven thousand

threat via Twitter by posting a Pastebin link. CASDORPH said it was a generic threat that had something to do with ISIS. CASDORPH boasted that believed it would not have been easy for law enforcement to prove how he did it unless he admitted to it.

IV. CONCLUSION

11. Based on the facts set forth above, I have probable cause to believe that violations of Title 18, United States Code, Section 844(e), has been committed by GAVIN LEE CASDORPH. I therefore respectfully request the issuance of an arrest warrant.



Eddie Garcia II
Special Agent, Federal Bureau of
Investigation

Subscribed and sworn to me this 12th
day of December 2018.

BY THE COURT:



HENRY S. PERKIN
United States Magistrate Judge

relays to conceal a user's location and usage from anyone conducting network surveillance or traffic analysis.