

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America )

v. )

Charlton Edward La-Chase, )

Case No. 18-08-SMM

Defendant(s)

FILED by [Signature] D.C.  
FEB 02 2018  
STEVEN M. LARIMORE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - FT. PIERCE

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 22 - 29, 2018 in the county of St. Lucie in the Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 875(c)	Interstate transmission of threat to injure the person of another.

This criminal complaint is based on these facts:

-SEE ATTACHED AFFIDAVIT-

Continued on the attached sheet.

[Signature]  
Complainant's signature

Mark Gibbons, Special Agent, FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date: 2/2/18

[Signature]  
Judge's signature

City and state: Fort Pierce, Florida

Shaniek M. Maynard, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT**

I, Mark Gibbons, being duly sworn, do state and attest as follows:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and I have been so employed since March 2005. I am currently assigned to Miami division, Fort Pierce Resident Agency. I have primarily been assigned to investigations dealing with violent crimes, computer crimes, and both domestic and international terrorism. Based on my experience as a federal law enforcement officer, I have conducted investigations of, and have been instructed in investigative techniques concerning terrorism and interstate threats to harm others, activities that are criminal offenses in violation of Title 18, United States Code, Section 875(c).

2. This Affidavit is based upon my own personal knowledge of the facts and circumstances surrounding the investigation and information provided to me by other law enforcement officers, and/or other witnesses. This Affidavit does not purport to contain all the information known to me about this case, but addresses only that information necessary to support a finding of probable cause for the issuance of a Criminal Complaint against Charlton Edward LA-CHASE, for transmitting in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another in violation of Title 18, United States Code, Section 875(c).

3. On January 26, 2018, the Miami Division of the FBI received a tip on the Public Access Line (PAL) Unit from an employee of the United States Coast Guard. The employee stated he called to report information he received from a subordinate at work. The subordinate's wife works with cooperating witness #1, (CW#1), who is a relative of LA-CHASE. The information provided to the PAL Unit was that LA-CHASE lives with his mother due to his deaf and mental illness issues. LA-CHASE has forbidden CW#1 from visiting the residence of LA-CHASE and

his mother and has threatened to behead CW#1 and his/her children. LA-CHASE has stated, "I want to be the first deaf person to create American casualties in the name of ISIS."

4. On January 29, 2018, FBI SA Jeffrey Serna interviewed CW#1. During the interview, CW#1 advised that in the past week his/her relative, LA-CHASE, had made threats via text message to harm people in the name of ISIS, and that he wanted to be the first deaf person to kill on the behalf of ISIS. CW#1 provided printed copies of the text messages he/she received from LA-CHASE, which I have reviewed. During one text message, LA-CHASE stated, "Fuck you. I prepare to get a rent truck flatbed. Hit/kill people while festive event by Isis terrormism (*sic.*) group told me. I been planning to be the first deaf ISIS. KILL PEOPLE LIKE NYC. DR GUY HIT / killed people. Thank you for not helping me. Fuck you." Another message stated, "First deaf terroism (*sic.*) history in USA. Like Las Vegas Man shoot over 500. Omar marten shooter over 100 lgbt. Fuck you." A third message stated, "Isis want make all deaf community and hearing people pay attention any news about me." A message directed at CW#1 stated, "You mess up my life in June 2016. Plus dec 2016. Fuck. U BE DEAD SOON SOON DEAD". These text messages were sent by LA-CHASE while traveling internationally in Costa Rica to CW#1 who is located in Fort Pierce, Florida.

5. CW #1 provided an image of LA-CHASE's Facebook page and articles discussing the ISIS recruitment of deaf fighters via online videos. Further review of LA-CHASE's Facebook page revealed an undated news clip featuring an ISIS recruitment video featured in a 2015 Newsweek article and 2015 online Deaf You Video blog post. This video though conducted in sign language is posted with a third party commentary in English describing the content and message. The commentary provided confirms ISIS's attempts to recruit individuals from the deaf community. A second video is the supposed abuse of a deaf Brazilian ISIS fighter by his deaf

Kurdish army captors. FBI translation states that the sign language references shooting and beheading deaf persons. A third video shows LA-CHASE at the Islamic Center of Fort Pierce on June 12, 2016 posting a message in sign language about Omar Mateen's attack on the Pulse Nightclub. Additional videos show members of the deaf community condemning LA-CHASE for being an ISIS supporter.

6. LA-CHASE has a history of violence as documented by incident reports and investigation reports dating back to 2010 from St. John's County FL Sheriff's Office, St. Lucie County Sheriff's Office, and Indian River County Sheriff's Office. These incidents include accusations of rape, assault and battery, assault – touch or strike, and Baker/Marchman Act.

7. CW#1 advised the FBI that LA-CHASE is currently in Costa Rica and is supposed to travel back to Florida on Sunday, February 4, 2018. CW#1 also stated that LA-CHASE may have attempted to purchase a firearm and he was denied the sale due to the background check and his mental illness. FBI investigation reveals LA-CHASE was denied a firearm purchase in May of 2017, at ValuePawn in Ft. Pierce, FL.

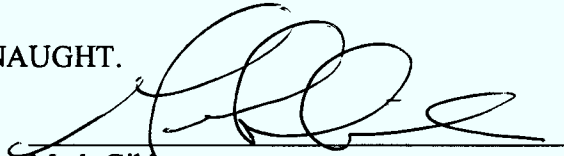
8. The text messages were sent from telephone number 772-979-4131. CW #1 advised the number is utilized by LA-CHASE. Open source data base checks show telephone number 772-979-4131 is associated with LA-CHASE through his Facebook account. LA-CHASE also utilized 772-979-4131 as contact information for the title change on a vehicle he purchased. Based on information known to law enforcement, I believe LA-CHASE is the user of telephone number 772-979-4131.

9. CW#1 stated in the interview with SA Serna that LA-CHASE was expelled from Gallaudet University in Washington, D.C. in approximately 2015. CW#1 stated LA-CHASE responded to a campus wide email about an active shooter and sent an email stating he was in fact

the shooter.


10. Based on the foregoing facts, I submit that probable cause exists to believe that Charlton Edward LACHASE, did transmit in interstate or foreign commerce a communication containing a threat to injure the person of another in violation of Title 18, United States Code, Section 875(c).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Mark Gibbens  
Special Agent  
Federal Bureau of Investigation

Sworn to me and subscribed before me  
this 2<sup>nd</sup> day of February, 2018  
at Fort Pierce, Florida.

  
The Honorable Shanik M. Maynard  
United States Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No: 18-08-SMM

UNITED STATES OF AMERICA

v.

CHARLTON EDWARD LA-CHASE,

Defendant.

\_\_\_\_\_ /

**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Miami Office of the United States Attorney's Office prior to July 20, 2008?

\_\_\_\_\_ Yes       No

2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office (West Palm Beach Office) only prior to December 18, 2011?

\_\_\_\_\_ Yes       No

3. Did this matter originate from a matter pending in the Fort Pierce Office of the United States Attorney's Office prior to August 8, 2014?

\_\_\_\_\_ Yes       No

Respectfully submitted,

BENJAMIN G. GREENBERG  
UNITED STATES ATTORNEY

By: Stephen Carlton

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