

Magistrate Judge Brian A. Tsuchida

<p>_____ FILED _____ LODGED</p> <p>_____ RECEIVED</p> <p><b>Jun 22, 2026</b></p> <p>CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA BY _____ DEPUTY</p>
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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

WILLIAM LEE SPARTACUS FALKNER,  
Defendant.

CASE NO. MJ26-5150

COMPLAINT for VIOLATIONS

Title 18, U.S.C. § 1117

BEFORE, the Honorable Brian A. Tsuchida, United States Magistrate Judge, U.S. Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

***(Conspiracy to Commit Murder)***

Beginning on a date unknown and ending on or about June 19, 2026, in Mason County, within the Western District of Washington and elsewhere, WILLIAM LEE SPARTACUS FALKNER, and others known and unknown, knowingly and intentionally combined, conspired, confederated and agreed together and with each other to violate Title 18, United States Code, Section 1117. It was a part and an object of the conspiracy

1 that WILLIAM LEE SPARTACUS FALKNER, and others known and unknown,  
2 would commit murder within the special maritime and territorial jurisdiction of the  
3 United States, namely, the White House and its surrounding grounds in Washington,  
4 D.C.

5 All in violation of Title 18, United States Code, Section 1117.

6 And the complainant states that this Complaint is based on the following information:

7 I, Marty Trevino, being first duly sworn on oath, depose and say:

8 **INTRODUCTION**

9 1. I am a Task Force Officer (“TFO”) with the Federal Bureau of  
10 Investigation Joint Terrorism Task Force (“FBI JTTF”) and have been a TFO with the  
11 FBI Seattle Office since September of 2020. I am currently assigned to FBI Seattle Field  
12 Office, Tacoma Resident Agency, Joint Terrorism Task Force, where I investigate,  
13 among other things, people who commit violent criminal acts in furtherance of their  
14 political and social ideology, and investigate threats associated with Domestic and  
15 International Terrorism. As a Task Force Officer, I received both formal and informal  
16 training from the FBI and Federal Law Enforcement Center regarding domestic and  
17 foreign investigations. Through my training and experience, I am familiar with the  
18 methods of operation that individuals associated with domestic and foreign terrorist  
19 organizations employ to communicate with associates regarding their ideology, to  
20 organize actions on behalf of their organizations, and to bring attention to their political  
21 and social agendas. As an FBI Task Force Officer, I have also participated in executions  
22 of multiple arrest and search warrants, including warrants executed in cases involving  
23 domestic terrorism and threats.

24 2. In the course of my assignment to the FBI, I have investigated a variety of  
25 domestic terrorism, counterterrorism, and criminal investigations, including the  
26 interviewing of witnesses and subjects, physical surveillance, analyzing data from  
27 electronic devices, executing search warrants, and the arrest of individuals wanted for  
various violations of federal and state law. I have also personally participated in the

1 execution of search warrants involving the search and seizure of electronic devices,  
2 vehicles, and documents of criminal activities. In addition to my formal training, I have  
3 learned from and worked alongside numerous FBI agents and Task Force Officers with  
4 years of experience in counterterrorism and criminal investigations. Throughout my  
5 experiences with these agents/TFOs, I have received training and real-time experience in  
6 various investigative techniques, including interviewing, evidence collection,  
7 surveillance, and data analysis.

8 3. The information in this Affidavit is based upon the investigation that I have  
9 conducted in this case, my conversations with other law enforcement officers who have  
10 engaged in various aspects of this investigation, and my review of reports written by  
11 other law enforcement officers involved in this investigation. Because this Affidavit is  
12 being submitted for the limited purpose of securing search warrants, I have not included  
13 each and every fact known to me concerning this investigation. I have set forth only those  
14 facts that I believe are relevant to a determination of probable cause to support the  
15 issuance of the requested warrants. When the statements of others are set forth in this  
16 Affidavit, they are set forth in substance and in part.

### 17 **SUMMARY OF PROBABLE CAUSE**

#### 18 **Overview of Investigation**

19 4. The FBI is investigating a plot to assassinate members of the United States  
20 government during an Ultimate Fighting Championship (“UFC”) event that occurred on  
21 June 14, 2026, (the “UFC Fight”) on the South Lawn of the White House in Washington,  
22 D.C., within the special territorial jurisdiction of the United States.

23 5. During the course of this investigation, the FBI has identified a group of  
24 conspirators who have procured weapons and made plans to carry out an attack at the  
25 UFC Fight on June 14, 2026.

26 6. On June 16, 2026, a review of co-conspirator, Abraham Alvarez’s  
27 Telegram account identified Telegram account 6264935723, display name “William Lee  
Falkner.” Through the course of the investigation, investigators learned Telegram user

1 “William Lee Falkner” communicated with co-conspirators about the use of drones and  
2 explosives to carry out the attack at the UFC fight.

3 7. As set forth below, investigators identified **FALKNER** as the individual  
4 operating the Telegram account 6264935723, display name “William Lee Falkner.”

5  
6 **Ohio Law Enforcement Uncover a Plot to Assassinate Federal Officials at the  
UFC Fight**

7 8. Based on my conversations with other law enforcement officers, review of  
8 relevant reports, databases, videos, photos, and extracted digital evidence pursuant to  
9 search warrants, I understand the following:

10 9. On or about June 10, 2026, at approximately 9:18pm, officers with the  
11 Knox County Sheriff’s Office and Danville Police Department in Ohio were dispatched  
12 to a residence in Danville, Ohio in reference to a disturbance. The caller, identified as the  
13 mother of Tycen Proper, was concerned about her son, identified as the Tycen C.  
14 PROPER (“PROPER”), due to his recent conduct, including firearms purchases and  
15 meeting with concerning individuals online.

16 10. Officers arrived on scene at approximately 9:38pm and spoke to PROPER,  
17 his mother, and father. PROPER is a 19-year-old male who lives at that residence with  
18 his parents. When deputies spoke to a person identified as Proper’s father, he stated that  
19 PROPER had recently met random people online and had been planning “recons” with  
20 these individuals. His father expressed how PROPER was planning to leave this  
21 upcoming weekend (the weekend of June 13, 2026) to meet up with these online  
22 individuals. His father further stated that PROPER had also recently acquired camping  
23 gear, food, ballistic plates, a new shotgun, a rifle, “lots” of ammunition, extra magazines,  
24 and plate carriers. PROPER allegedly spent approximately \$3000 of his graduation  
25 money to purchase the previously described equipment.  
26  
27

1 11. In addition to the above behavior, PROPER’s father stated that PROPER  
2 also quit his job recently in preparation to meet the individuals he had been interacting  
3 with online to conduct “missions” and “recons.” His father did not have any additional  
4 information about the identities of the people with whom PROPER was speaking.

5 12. The Knox County Sheriff’s Office took photos of the equipment acquired  
6 by PROPER which included several boxes of ammunition (estimated by law enforcement  
7 to be in the thousands of rounds of ammunition), two plate carriers with AR-style  
8 magazines, an AR-style rifle, and a bullpup rifle painted with an American flag. The  
9 equipment was turned over voluntarily by the family to law enforcement.

10 13. At the conclusion of the encounter, PROPER was transported by the Knox  
11 County Sheriff’s Office to a local hospital where law enforcement submitted an  
12 application for emergency admission based on homicidal ideations. The application  
13 detailed that PROPER had been thinking about joining the military or police force with  
14 the goal of being able to kill people.

15 14. On June 11, 2026, the Knox County Sheriff’s Office contacted the FBI as a  
16 result of its interactions with PROPER.

17 15. I am also aware that on June 11, 2026, another FBI agent contacted  
18 Proper’s mother for a telephone interview for additional information. She detailed that  
19 PROPER had recently began interacting with a group online that was comprised of  
20 individuals who stated to be ex-military and Christian-based. She stated that she didn’t  
21 know the name of the group, but that they expressed ultra-religious and anti-government  
22 sentiments, specifically citing grievances about government corruption, the handling of  
23 the Epstein files, data centers taking up all the water in communities, and other  
24 government actions. Proper’s mother detailed that talking with these individuals online  
25 has caused PROPER to lean heavily into his religion and she believed that those  
26 individuals were using religion to manipulate and influence her son.

1 16. In addition to the equipment and firearms PROPER had recently purchased,  
2 she stated that she observed him recently engaged in physical training, which she initially  
3 thought was to further his aspirations to join the military or police, but later learned it was  
4 on behalf of the online group he was talking to.

5 17. Proper's mother detailed that the communications with these individuals  
6 largely occurred on his cellular device, and provided a phone number for PROPER as  
7 XXX-XXX-3044. She also stated that she recently observed PROPER researching and  
8 mapping locations in the area just northwest of Washington, D.C. She stated that she also  
9 observed additional images and maps being sent to him from unknown individuals  
10 through texts and Discord messages, and would overhear PROPER talking to these  
11 individuals verbally on his phone.

12 18. When Proper's mother asked PROPER what he was doing, he stated that he  
13 couldn't tell her exactly what he was doing, but that they were looking at multiple  
14 different locations and intended to conduct "recon" as well as "hit and run missions." An  
15 FBI TFO asked Proper's mother what she thought PROPER meant when he said "hit and  
16 run missions" and she believed that it meant conducting shootings and then leaving.

17 19. On June 11, 2026, the FBI, in coordination with the Ohio local law  
18 enforcement, executed a local search warrant at the residence of PROPER, recovering a  
19 journal from his room. While on scene, investigators also observed a large quantity of  
20 boxes of spent ammunition, rounds of spent cartridge casings, and other tactical clothing.  
21 Investigators also spoke to PROPER's father and grandmother, who stated that PROPER  
22 had become more closed off from his family and spent most of his time online speaking  
23 to unidentified individuals. PROPER's family members also highlighted concerning  
24 statements he made in recent months, such as making sympathetic comments about Adolf  
25 Hitler, and posting anti-Semitic comments on Facebook.

26 20. In addition to the search warrant on PROPER's residence, a state search  
27 warrant was executed on the Apple iPhone belonging to PROPER which had been

1 previously seized by the Knox County Sheriff's Office to preserve evidence. During a  
2 preliminary review of the device, investigators observed chats on Signal groups that laid  
3 out detailed plans to conduct an attack in Washington, D.C. with several unidentified co-  
4 conspirators. In the chat, detailed imagery of the National Capitol Region and maps of  
5 the area were shared highlighting sniper locations, potential drone launch locations, and  
6 other detailed tactical planning.

7 21. Other FBI investigators also traveled to Dublin Springs Mental Health  
8 center in Columbus, Ohio to conduct an interview with PROPER. The interview was  
9 consensual and took place in an unlocked room while a case worker was also present.  
10 During the interview, PROPER admitted to planning with others a coordinated attack  
11 against the United States government, to take place during the UFC event scheduled to  
12 take place on the White House lawn in Washington, D.C., on Sunday, June 14, 2026.  
13 PROPER also provided additional details on the planned attack and stated that the plan as  
14 he knew it was to stage a demonstration on the north side of the White House. While the  
15 demonstration was taking place, the group would fly small, unmanned aircraft (i.e.  
16 drones) laden with unspecified explosive devices which would detonate over the north  
17 side of the UFC arena. When the unmanned aircraft detonated, the intent was to force the  
18 crowd attending the UFC event and high value targets (HVTs) to evacuate to the south.  
19 PROPER stated that the plan was for members of his group to act as snipers and  
20 additional shooters, preferably with long guns, staged at the south to conduct shootings of  
21 the members of the crowd and HVTs as they fled from the explosive devices which had  
22 just been detonated.

23 22. I am aware that a UFC event was scheduled to take place on the lawn of the  
24 White House on Sunday, June 14, 2026. I am aware that the President of the United  
25 States was scheduled to be in attendance at the event and also, based on news reports and  
26 open-source reporting, that politicians, including members of Congress and the Cabinet  
27 were expected at the UFC event. I am also aware, that after the interview of PROPER, a

1 review of his cell phone revealed chats in the application SimpleX, wherein PROPER  
2 chatted with conspirators regarding the attack on June 14, 2026 and planning for that  
3 event. In chats on or about May 13, 2026, PROPER stated, “I got a possible target  
4 Marsha Blackburn is senator for Tennessee,” and in response to a question asking why  
5 attack her, he stated, “She’s taken money from the Israel pro Israel lobby and supports  
6 them.” On May 31, 2026, PROPER sent messages, leading with the text “These are  
7 people we’re going to focus on,” and then sent images of U.S. Senator Jim Justice, U.S.  
8 Senator Shelley Moore Capito, U.S. Representative Carol Miller, and U.S. Representative  
9 Riley Moore. The four images of these four members of Congress appear to have been  
10 taken from the website “TrackAIPAC.com” and appear to include information about how  
11 much money each congressperson received “from pro-Israel PACS.”

12 23. PROPER further detailed the Signal chats that would be on his electronic  
13 devices (i.e. his cell phone) and stated that members were primarily recruited through  
14 TikTok, and that once an individual proved himself to established members of the group  
15 on TikTok, he was transitioned to a vetted (and more secure) Signal chat. PROPER  
16 stated that videos, pictures of tactical kits, physical training proof, and other material was  
17 sent through TikTok direct messages amongst the individuals and established members of  
18 the group.

19 24. PROPER also indicated to investigators that he had been planning to drive  
20 to Washington, D.C., from Ohio, travelling through West Virginia. In West Virginia, he  
21 planned to meet up with a member of the online group and to drive with that individual  
22 the rest of the way to Washington, D.C. Investigators identified that individual in West  
23 Virginia. On June 12, 2026, the FBI interviewed that individual in West Virginia, who  
24 confirmed that he and others communicated online about attacking the UFC event in  
25 Washington, D.C., but claimed that the members of the group had cancelled their attack  
26 plans on the morning of June 12.

1           25. A review of PROPER’s cell phone also revealed chats in the Signal app,  
2 consistent with much of what PROPER described. In PROPER’s phone, investigators  
3 could see that there was a primary large chat, consisting of approximately 19 individuals.  
4 Additionally, there were smaller chat groups, consisting of approximately 4-5  
5 individuals. These smaller chat groups were based on role assignments and locations, for  
6 example shooters at one location or shooters at another location. The review of  
7 PROPER’s cell phone also revealed the group discussing exit, escape and evasion  
8 resources for the attack, including the location of a potential “safe house,” and also  
9 potential exfiltration or escape routes for members of the group after the attack (some  
10 plans indicated that members of the group would travel from the area of the White House  
11 to the Potomac River and travel along the river to escape the area).

12           26. During an interview with FBI Agents, PROPER stated, he directly reported  
13 to “FULCRUM.” FBI identified FULCRUM as Daniel Eskridge (ESKRIDGE).  
14 ESKRIDGE would then contact “SHEPHERD” regarding matters that would rise to his  
15 level in the chain of command. FBI identified SHEPHERD as Abraham ALVAREZ  
16 (ALVAREZ). ALVAREZ was the leader of the entire group, ESKRIDGE and  
17 “WHISKEY6” were just below ALAVREZ, while the team leaders, to include PROPER  
18 and “GHOST/NOBLE,” were at the bottom of the group’s leadership hierarchy. FBI  
19 identified WHISKEY6 as Michael Allen Thomas (THOMAS) and GHOST/NOBLE as  
20 Bryan Omar Roa (ROA). PROPER had very little communication with ALVAREZ,  
21 aside from when he was originally recruited through the VANGUARD OF THE OLD  
22 TikTok group/channel.

23           27. During his June 11, 2026, interview, PROPER also indicated that he had  
24 purchased equipment for the attack for other individuals.

25           28. On June 12, 2026, FBI personnel interviewed PROPER again at the Dublin  
26 Springs Mental Health. After receiving Miranda warnings, PROPER provided  
27

1 information that confirmed what he had stated to the FBI during his June 11, 2026,  
2 interview.

3 **Involvement of FALKNER in Conspiracy**

4 29. Through the course of this investigation, investigators have identified  
5 communications between co-conspirators on various internet-based platforms including  
6 Signal and SimpleX starting in approximately mid-May 2026. Investigators are aware of  
7 communications on platforms discussing the need for additional drone operators to  
8 effectuate the conspirators' plan of attack against the UFC Fight.

9 30. Investigators reviewed co-conspirator Telegram communications of  
10 "SHEPHERD" known to investigators as Abraham Alvarez's (ALVAREZ).  
11 ALVAREZ's Telegram account showed SHEPHERD /ALVAREZ communicated with  
12 co-conspirators WHISKEY6/THOMAS, FULCRUM/ESKRIDGE and an individual  
13 using Telegram account 6264935723 with display name "William Lee Falkner"  
14 (hereinafter "William Lee Falkner") on a channel called "D Ops." William Lee Falkner  
15 joined ALVAREZ's chat group, "D Ops" on June 7, 2026.

16 31. Between June 7, 2026, and June 11, 2026, William Lee Falkner  
17 communicated with ALVAREZ, THOMAS, and ESKRIDGE about his ability to procure  
18 and operate drones; tactics and drone related strategy; and the use of explosives. Postings  
19 of William Lee Falkner on "D Ops" channel included:

- 20 • "Are we sure on this incendiary route? If this is a direct impact, it would be  
21 cheaper, safer, and more effective if we used a shaped impact explosive.  
22 Would be easier to rig a mechanism for, and electrical contacts that trigger  
23 the fun when the bird hits the face requires no latency."

24 32. WHISKEY6 posted a series of posts on June 11, 2026, in D Ops, including  
25 "I think we're down to 7 days. Where are these drones gonna need to get picked up? I  
26 need 5. Same location, conveniently enough. It's gonna be a fucking bloodbath [heartface  
27 emoji]. And broadcast live tv [emoji].

1 33. William Lee Falkner responded by posting, “3 from Missouri, 2 from NV,  
2 maybe 2 or 3 from fort as backups. I’m in the PNW. Weird but it’s how I have my  
3 network set up. I got people in low places making them for me. The more drones the  
4 better.”

5 34. Other postings of William Lee Falkner on “D Ops” channel included:

- 6 • “I’ll see what I can do, but I think that’s reasonable. I have a contact in NV  
7 with a shipping LLC. Might be able to ship them for cheap. We’re just  
8 paying for material since we do have manufacturing capabilities. We’re  
9 looking at 200-300\$/drone if you want this done right. Tricked out with  
10 fiber optic cable, enough motor and battery power to lift/carry at least 12  
11 pounds, and a decent flight control chip that can’t be jammed out or fried  
12 remotely. Depending on the location, we may need to line the drone with  
13 faraday material to prevent DE/ interference platforms from causing  
14 problems.”
- 15 • “Lets say 250/drone and you want 5 drones that would be 1250+ shipping  
16 from my contact who I’ve known since middle school and used to run guns  
17 and drugs with this guy. Solid dude.”
- 18 • “The first 2 will be frag HE, the final 3 will be shaped for the piles.” “The  
19 more drones you get, the more chance you have of actually succeeding. I  
20 can fly up to 40 simultaneously, but I’m just saying 5 might not be enough.  
21 In Ukraine, sometimes they send out 2 or 3x the ammount [sic] of  
22 drones/target for max effectiveness.” [I know from my training and  
23 experience that a “frag HE” is a fragmentation high explosive round.]
- 24 • “We want it to be able to carry 2 155mm shells.” [I know from my training  
25 and experience, including my experience with the United States military,  
26 that a 155mm shell is a reference to US military munitions, specifically  
27 M795 155mm artillery shells.]

- 1 • “You bet. Strong enough motors, 6 motors each will be enough to carry a  
2 155. 1 per drong, 3 drones. I’ll call him now. May need to do some hacking  
3 into satellite databases again tho for on the ground intel. I’m pretty sure the  
4 effective kill radius is 50 meters. It will be loud, but it’ll be quick. That’s  
5 the reason wee need the fiber optic cable, so that they would need to  
6 kinetically shoot them down. Fiber connections are completely  
7 unjammable.” The posts later continued with “So that way I don’t get fried  
8 by Feds as soon as they land. The other 2 drones will be frag to  
9 disincentivize anyone from going closer. Actually now that I think about it  
10 we need to have these covered and propositioned on rooftops. It’s too risky  
11 to be setting them up just before or during the event.”
- 12 • “The bodies are being printed as we speak. Carbon fiber.” [I know from my  
13 training and experience that drone bodies can be printed on home-based 3D  
14 printers as well as manufactured in production facilities.]
- 15 • “I can fly 40+ drones at the same time to the same target.”
- 16 • “Well this ain’t gonna [sic] be a false flag like the last 10 attempts on his  
17 life. Every week now we hear some guy went over there alone with a gun  
18 and gets shot. I don’t get what’s so hard about just flying a few drones and  
19 getting some help to do so.” [I know from my training and experience that a  
20 “false flag” is an act committed with the intent of disguising the actual  
21 source of responsibility for the act, often allowing attribution for the act to  
22 be directed at an uninvolved individual or group.]
- 23 • “The drone frames are being printed as we speak, I got the flight control  
24 chips ready, we need motors, gyros and like 25KM of fiber optic cable and  
25 a few other odds and ends.”
- 26 • “That’s what I could get moving around. Thinking we may need to hit an  
27 MIC facility for the things we need. Fuck a cook, let’s just grab what’s

1 already there.” [I know from my training and experience that the acronym  
2 MIC is used to reference a Military Industrial Complex (MIC) facility.]

- 3 • “Anyone can steal, [sic] we just need to know where exactly 3 155mm  
4 shells are stored. The frags I think I can buy in Reno, but if you wanna [sic]  
5 really just get rid of them? 155 shells. 3 of them on 3 drones.”
- 6 • “I refuse to take chances. Anything we can make at home isn’t gonna [sic]  
7 be enough. I mean there will be piles of meat, directional frag charges  
8 where the frag goes 350 m/s only really has the ballistic capability to  
9 MAYBE go through an arm or two, MAYBE through some soft armor. If  
10 you want them gone, you need something bigger than a little Ukrainian  
11 present from the sky.”
- 12 • “Scranton Army Ammunition Plant (Scranton, PA): Operated by General  
13 Dynamics Ordnance and Tactical Systems, this facility has been in  
14 continuous operation since 1963 and is a primary producer of large-caliber  
15 metal shell bodies. [1, 2]”<sup>1</sup>
- 16 • “General Dynamics (Mesquite, TX): A new Universal Artillery Projectile  
17 Lines facility that produces 155 mm metal casings, backed by major multi-  
18 million-dollar modernizations. [1, 2]”
- 19 • “Parsons Assembly Facility (Parsons, KS): Operated by Day &  
20 Zimmermann, this load, assemble, and pack (LAP) facility became fully  
21 operational to dramatically scale up the production of 155 mm M795  
22 projectiles. [1, 2]”
- 23 • “Camden Operation (Camden, AR): Another key load, assemble, and pack  
24 facility operated by Day & Zimmermann to expand the output of 155 mm  
25 shells originating from the Iowa Army Ammunition Plant.”

26  
27 <sup>1</sup> The “[1,2]” contained in this posting, and subsequent postings, appears to be an artifact from source material, such as a posting with footnotes on a website such as Wikipedia.

1           **Identification of FALKNER**

2           35.     According to data provided by Telegram pursuant to an emergency  
3 disclosure request the Telegram user William Lee Falkner had listed an account  
4 telephone number of 775-742-3214. Investigators using law enforcement databases found  
5 that number was associated with an address in Nevada. According to Nevada Department  
6 of Motor Vehicles records, William Lee Spartacus **FALKNER** possessed a Nevada state  
7 driver’s license listing the same residential address as the address associated with  
8 telephone number 775-742-3214.

9           36.     According to META records, on June 18, 2026, Instagram account  
10 57091499770, username @acheezy1 shared a post with Instagram account 29093724983,  
11 username @llockna. In the posting @acheezy1 wrote, “I alr [sic]told Jerry and Gavin but  
12 if you see me on the news I did that shit and stand by it.” “Well I hope you don’t see me  
13 on the news but if you do you’ll know.”

14           37.     According to Meta records, Instagram user @acheezy1, with display name  
15 William Lee Falkner, has an account telephone number of 775-742-3214, which is the  
16 same number for Telegram user William Lee Falkner. Furthermore, according to Venmo  
17 records, telephone 775-742-3214 is also connected to a Venmo account with display  
18 name William Lee Falkner and a Cash App account with display name William Lee  
19 Falkner. Additionally, investigators have compared images of the Instagram user  
20 @acheezy1, who has displayed images of himself on the account in so-called selfie  
21 images, with Nevada Department of Licensing photograph of William Lee Spartacus  
22 **FALKNER** and concluded the Instagram user @acheezy1 appears to be consistent with  
23 **FALKNER**’s Nevada licensing photograph.

24           38.     On June 18, 2026, Instagram account 57091499770, username @acheezy1,  
25 shared a post, pasted below, with Instagram account 27069171126, username  
26 @urbfsbush.

Authoracheezy1 (Instagram: 57091499770)

Sent 2026-06-18 01:19:37 UTC

Body We don't use discord for operations. We use a meshtastic network that is completely disconnected from the internet as a whole. Yes they can track you using social media unless you have a VPN, an IP spoofer and HWID spoofers. You even have to scrub your IMEI. You have to basically turn the phone into a glorified brick and install your own parts. Yes there are cookies and metadata in every picture you take and message you send. That's why you obfuscate and separate and compartmentalize everything. There's no way to connect one account to another because all the system sees is 2 accounts with none of the same information on the back end. The exception is for tik tok and when you post things. I think there's a Facebook posts of me from my families accounts but the only place my face and name exists on the internet is tik tok and dating apps which don't connect me to my work. And no, if they knew what I was up to I'd be in a cell m. Intent to commit a crime is still a crime

39. From June 14, 2026, to June 17, 2026, @acheezy1 used the following IP addresses: 71.212.10.48, 71.212.25.171:60707, and 71.212.18.187. IP Address 71.212.10.48 was the most recent IP address accessed by Instagram user @acheezy1. The IP address resolved to 4480 E Razor Rd W, Belfair, WA 98528. According to Washington Department of Licensing record, 4480 E Razor Rd W, Belfair, WA 98528 is the listed address for **FALKNER**.

40. According to Accurint, a database routinely used by law enforcement, an individual Janet Turman is identified as living/owning address 4480 E Razor Rd W, Belfair, WA 98528. Investigators believe Turman is **FALKNER's** grandmother because local police reports reported her as **FLAKNER's** grandmother.

**Instagram user @acheezy1 Communicates Intent to Take a Trip Before UFC Fight**

41. According to data provided by Meta pursuant to an emergency disclosure request, Instagram users @urbfsbush and @acheezy1 communicated about a "work trip." On June 10, 2026, prior to the scheduled UFC fight at the White House, at approximately 8:22 Coordinated Universal Time (UTC), Instagram user @urbfsbush messaged user @acheezy1 "Please don't go I have a really really bad feeling.." Within a minute,

1 @acheezy1 wrote back, “Go where? The work trip? I have a bad feeling too but it has to  
2 be done”

3 **Instagram user @acheezy1 Communicates about Acquiring Drones**

4 42. According to data provided by Meta pursuant to an emergency disclosure  
5 request, Instagram user @acheezy1 communicated with another about acquiring drones.  
6 On June 7, 2026, at approximately 15:16 UTC @acheezy1 messaged another Instagram  
7 user “Wanna make some money”. About a minute later, @acheezy1 wrote, “Set that 3D  
8 printer up as soon as you can”. The person @acheezy1 messaged responded asking what  
9 was needed. Instagram user @acheezy1 wrote back, “5 drone frames.” At about 15:26  
10 UTC, the person @acheezy1 wrote to responded, “Is there some deadline? i really dont  
11 have the means to set up right now but some figuring can be done”. At 15:28 UTC, user  
12 @acheezy1 responded, “ASAP. 7 days till they need to be operational. I’ll handle  
13 shipping and everything else. Just need you on the frames, got everyone else doing their  
14 own thing.” I know the UFC fight was scheduled to occur at the White House on June 14,  
15 2026.

16 **Communications of @acheezy1 After Arrests Related to Planned Attack**

17 43. According to data provided by Meta pursuant to an emergency disclosure  
18 request, Instagram user @acheezy1 communicated about arrests related to the planned  
19 attack on the UFC fight at the White House. On June 18, 2026, at about 00:25 UTC,  
20 @acheezy1 messaged @urbfsbush and wrote, “Work trip is canceled. My boss got picked  
21 up.” Instagram user @acheezy1 then sent a link to an article detailing the FBI’s arrest of  
22 individuals planning the attack on the UFC fight at the White House. Instagram user  
23 @acheezy1 then wrote, “My boss got picked up. He is in custody.” Later, on June 18,  
24 2026, @acheezy1 wrote, “In the article I sent you it mentions the involvement of  
25 everyone but me and the people you already know. Because we took precautions. My  
26 phone is jailbroken btw. Diver sent me a NIC chip for it a while back but you don’t know  
27

1 what that is. We didn't trust my boss to do this right going into everything. We all felt  
2 something was going wrong. Good news is I'm still being paid."

3 **Evidence of Broader Goals of Conspiracy**

4 44. After being arrested THOMAS, who communicated with FALKNER in the  
5 D Ops channel under handle WHISKEY6, said that the aim of the UFC attack and  
6 subsequent attacks was to create enough chaos to bring about the overthrow of the United  
7 States government.

8 **CONCLUSION**

9 45. Based on the aforementioned facts, I respectfully submit that there is  
10 probable cause to believe that WILLIAM LEE SPARTACUS FALKNER committed the  
11 offense of Conspiracy to Commit Murder, in violation of Title 18, United States Code,  
12 Section 1117.

13 *Marty Trevino*

14 \_\_\_\_\_  
15 MARTY TREVINO, Complainant  
16 Task Force Officer, FBI

17 The above-named Task Force Officer provided a sworn statement attesting to the  
18 truth of the contents of the foregoing affidavit by telephone on this 19th day of JUNE,  
19 2026. Based on the Complaint and the sworn statement, the Court hereby finds that there  
20 is probable cause to believe the Defendant committed the offense set forth in the  
21 Complaint.

22 Dated this 19<sup>th</sup> day of June, 2026.

23 *Brian A. Tsuchida*

24 \_\_\_\_\_  
25 BRIAN A. TSUCHIDA  
26 United States Magistrate Judge  
27