

SEALED

STATE OF FLORIDA

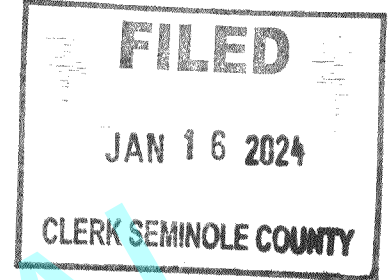
IN THE CIRCUIT COURT OF THE
EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR SEMINOLE COUNTY,
FLORIDA

VS

24CF113A

Complaint No.: 20240000166
Seminole County Sheriff's Office

Alan Winston Filion
43732 Andale Ave
Lancaster, Orange County, California 93535
W/M, DOB: 10/30/2006
Height: 6'3" Weight: 240
Hair: Brown Eyes: Brown



Offenses:

- 1) **False Report Concerning Planting of Bomb, Explosive or Use of a Weapon of Mass Destruction or Concerning the Use of Firearms in a Violent Manner While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim- Florida Statutes: 790.163, 775.31, 775.085, (Felony of the First Degree Punishable by up to 30 years in prison),**

- 2) **Unlawful Use of a Two-Way Communication Device While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless**

Status or Advanced Age of the Victim - Florida Statutes: 934.215, 775.31, 775.085, (Felony of the Second Degree Punishable by up to 15 years in prison),

3) **False Report to Law Enforcement Concerning Commission of a Capital Felony While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim - Florida Statutes: 837.05(2), 775.31, 775.085, (Felony of the Second Degree Punishable by up to 15 years in prison),**

4) **False Report to Law Enforcement Causing Public Safety Agency Response (Swatting) While Facilitating or Furthering an Act of Terrorism and or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim - Florida Statutes: 817.49, 775.31, 775.085, (Felony of the Third Degree Punishable by up to 5 years in prison).**

AFFIDAVIT FOR ARREST WARRANT

THE STATE OF FLORIDA)
COUNTY OF SEMINOLE)

BEFORE ME, Deputy Sheriff James Rhodes, a law enforcement officer, personally appeared Detective Hunter Corchado, and before me, Natalie Leavitt, a law enforcement officer, personally appeared, Agent Michael Stults, who as co-affiants, alleged that on May 12, 2023, in Seminole County, Florida, the Defendant, in violation of Florida Statutes, did commit the criminal offenses of **False Report Concerning Planting of Bomb, Explosive or Use of a Weapon of Mass Destruction or Concerning the Use of Firearms in a Violent Manner While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim- Florida Statutes: 790.163, 775.31, 775.085, (Felony of the First Degree Punishable by up to 30 years in prison), Unlawful Use of a Two-Way Communication Device While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim - Florida Statutes: 934.215, 775.31, 775.085, (Felony of the Second Degree Punishable by up to 15 years in prison), False Report to Law Enforcement Concerning Commission of a Capital Felony While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim - Florida Statutes: 837.05(2), 775.31, 775.085, (Felony of the Second Degree Punishable by up to 15 years in prison), False Report to Law Enforcement Causing Public Safety Agency Response (Swatting) While Facilitating or Furthering an Act of Terrorism or While**

Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim – Florida Statutes: 817.49, 775.31, 775.085, (Felony of the Third Degree Punishable by up to 5 years in prison).

Probable cause having been found upon sworn statement of Detective Hunter A. Corchado of the Seminole County Sheriff's Office, and Agent Michael Stults of the Federal Bureau of Investigation who, both being first duly sworn depose and say:

Your co-affiant, Detective Hunter Corchado, is presently employed by the Seminole County Sheriff's Office, Seminole County, Florida, and has been a duly sworn Deputy Sheriff since 2014. Prior to your co-affiant's employment with the Seminole County Sheriff's Office, he was employed by the Mount Dora Police Department. Your co-affiant successfully completed and graduated from Lake Technical Law Enforcement Academy, required by the State of Florida, which incorporates seven hundred and seventy hours of training. Your co-affiant has attended and successfully completed a Bachelor of Science in Criminal Justice from the University of Central Florida. In September of 2023, your co-affiant completed the requirements for graduation from the Federal Bureau of Investigation's Hazardous Devices School and attained the title of United States Public Safety Bomb Technician. Additionally, your co-affiant has conducted numerous criminal investigations, which have led to the arrest and prosecution of suspects while working as a Detective with the Seminole County Sheriff's Office.

Your co-affiant, Michael Stults, is a Special Agent with the Federal Bureau of Investigation (FBI) and has been in this position since January 2018. Since graduating the 24-week new agent training course at the FBI Academy in Quantico, your co-affiant has served on a Domestic Terrorism squad. Your co-affiant has investigated a wide array of criminal violations and activities which involve acts dangerous to human life and an associated social or political motivation. Your co-affiant has received advanced training in and teaches online techniques for criminal investigations. Your co-affiant has completed professional certificates for information security and worked as a web developer for a large private company in prior employment.

Probable Cause

Background

Swatting

Swatting is a criminal harassment tactic that involves deceiving emergency services into sending a police or emergency service response team to a victim address where there is no actual emergency. During swatting incidents, the victims are often detained and may be handcuffed. Their homes may be searched, often in the view of their neighbors. Swatting victims generally feel fear, confusion, embarrassment, and stress as a result.

Because swatting calls involve tricking dispatchers into believing that there is a critical, life-or-death situation unfolding at a particular residence, these incidents often tie up significant law enforcement and emergency services resources. As a result, these same resources are no longer available to respond to real emergencies that may be occurring elsewhere in the area.

Furthermore, swatting can be dangerous for both the responding officers as well as the victims. For example, in 2017, a man from Wichita, Kansas, was killed when officers showed up at his address after receiving a hoax call that the resident had killed his father and was holding his family members

hostage and at gunpoint. Officers mistakenly thought the man was reaching for a weapon when he answered his door, and he was shot and killed.¹

Relevant Social Media Platforms

Based on your co-affiants' training and experience, your co-affiants know that Telegram is a cloud-based messaging service that can be accessed and used from mobile devices and computers. Telegram uses a variety of security and privacy methods to anonymize and encrypt user data. As a general matter, this means that Telegram is unable to provide subscriber information and non-public account content in response to legal process.

- Telegram requires a phone number to create an account, and each account has a unique digital identifier, or "User ID" associated with it.
- Telegram also allows users to create a unique username or "Telegram ID" which can be shared with contacts instead of having to share a phone number.
- In addition to the User ID and Telegram ID, a Telegram user can also create non-unique display names which are displayed when a user's account is viewed.

Telegram offers a variety of cloud-based messaging services for users. Most relevant here are Telegram "channels," where a user can broadcast messages and material to other users who subscribe to the channel. A channel is a one-way means of communication, whereby the operator of the channel sends content to the subscribers. These channels can be public or private. Like a user account, a channel can have both unique "Channel ID" and a non-unique display name.

Based on your co-affiants' training and experience, your co-affiants know that Discord is a popular instant messaging, voice communication, and chat platform. Discord users can communicate using voice, video, and text messaging one-to-one, in private chat groups, or as part of larger groups of users on a "server" or channel. Discord user accounts are assigned a unique user ID number but can also create their own username. These user-selected usernames are generally how accounts are identified.

Summary of Investigation

School Threats in Washington

Between October 10 and 18, 2022, the Anacortes Police Department and Anacortes High School, both located in Anacortes, Skagit County, Washington received at least five threats to bomb, shoot, or otherwise conduct violence at the school. Some of those threatening communications were purportedly made by VICTIM-1, a 17-year-old student at Anacortes High School. Investigators concluded that VICTIM-1 was not the perpetrator, and rather, had been a target of swatting attempts.

Shortly thereafter, the Federal Bureau of Investigation (FBI) learned of a Telegram user who was offering swatting as a service. The display name for this user was "Nazgul Swattings," with Telegram ID @Lacrimosa451, and User ID 1716885045 (hereinafter, TELEGRAM-1).² On Telegram,

¹ The defendant in that case, also a serial swatter, was sentenced to 20 years in prison after being charged in three judicial districts, including the Central District of California, with more than fifty swatting and hoax calls. See <https://www.justice.gov/usao-ks/pr/california-man-sentenced-deadly-wichita-swatting-case> (March 29, 2019).

² Investigators observed these account attributes, and those discussed throughout this affidavit from publicly available information on the Telegram platform.

TELEGRAM-1 claimed to swat and dox³ people regularly and offered to share audio recordings of his previous swatting activities. TELEGRAM-1 regularly shared these claims on the “D o x b i n” and “Leak Society” Telegram channels, which your co-affiants know from experience to be channels associated with sharing dox information.

Investigation into TELEGRAM-1 revealed a long history of activity on Telegram, dating back to at least July 2021. The user of TELEGRAM-1 has changed his username and display name multiple times. He has also created and operated multiple “Torswats” themed Telegram channels to post swatting calls and offer swatting services.⁴ Despite the different names, the user account and channels were all associated with TELEGRAM-1.

On October 13, 2022, TELEGRAM-1 posted to the “D o x b i n” channel:

“My name is [VICTIM-1]. 2 days ago, I called in a fake mass shooting threat to Anacortes High School so I could get you pigs to search the school and declare an “all clear” so you would not be prepared for when the real school shooting comes. Now, it is too late for you to stop me. I have an illegally modified fully auto AR-15 and Glock with Level IV body armor and I am right outside the school gates ready to shoot up your faggot-infested school. I have pipe bombs on my body that I will use as grenades, I will kill all of the fags that I see and also some fag enablers like you cops. In addition, I have placed 5 pipe bombs under the cars of various school administrators and 6 in multiple classrooms. They are set to detonate a minute after class starts. Afterwards, I will walk in and shoot everyone I see. Did you get the message? Yes. Anacortes High School. Goodbye.”

Anacortes Police Department records show that the content of this post matched the details of call made to the department. The context of the post indicated that TELEGRAM-1 was claiming responsibility for the threat. The details of the call to the police were not public, indicating that TELEGRAM-1 was likely involved with the threat call. After posting this message, TELEGRAM-1 stated, “check out my channel,” indicating that they operated a Telegram channel.

Further “Swatting” Activity

Investigators located a Telegram channel that appeared to be connected to TELEGRAM-1. The channel, “Nazgul Swats,” was created on July 31, 2022. By January 10, 2023, it had been renamed “Torswats (Formerly Nazgul Swats)” and used the Channel ID @swattingsontelegram. A pinned post⁵

³ The term “dox” refers to when a person publicly shares typically private, personally identifiable information of another person such as their home address, phone number, email addresses, or place of employment, often for malicious purposes.

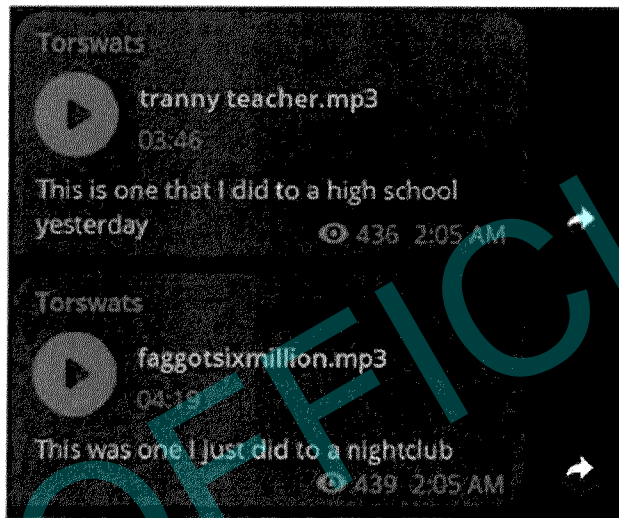
⁴ Based on the current investigation, your co-affiants know that the operator of the Torswats Channel primarily used Telegram to solicit and share his swatting activity. However, evidence also shows accounts on other platforms, including Discord and YouTube that are linked to the same operator.

⁵ A pinned post is a post or message that remains static at the top of a channel so that it is readily visible to visitors.

directed viewers to contact TELEGRAM-1 to place an order and openly advertised the following services:

\$40 for EMS/Fire/Gas Leak [\$35 for returning customers], \$50 for a major police response to the house [\$40 for returning customers], \$75 for a bomb threat/mass shooting threat (they will shut down the school or public location for a day) [\$60 for returning customers]. All swats will be done ASAP or present time.

This channel (the Torswats Channel) also contained posts of several audio recordings of the “swats” that the channel user claimed to have conducted. From your co-affiants’ review of the recordings, it is clear the subject was speaking with emergency services dispatchers while reporting false emergencies and making threats. The posts containing call recordings were frequently captioned with claims of responsibility for the call such as “This is one that I did”. Two examples of this are shown in the screenshot below:



On October 2, 2022, the user of the Torswats Channel posted a video of an individual who was live streaming himself playing a video game. The person left his desk, and shortly thereafter Dallas Police Department officers could be seen entering and securing the room. The officers could be heard concluding that the individual in the house “got swatted.” Dallas Police Department records show that on October 2, 2022, consistent with the video, officers were dispatched to the residence of Matthew Shank, a Twitch⁶ live-streamer. The officers were responding to a 911 caller who gave the name “Matthew Shanks,” and claimed to have shot his girlfriend at the residence.

On October 12, 2022, the user of the Torswats Channel posted two recordings of the threats called into Anacortes High School, allegedly implicating VICTIM-1.

Investigators identified another Telegram channel named “Torswats,” created on December 26, 2022. This channel had an almost identical Channel ID to the channel discussed above: @swatsontelegram. Further, the operator of this new channel made posts directing viewers to the new Torswats Channel, stating that the old channel would be kept as a backup. The new channel continued to advertise hoax and swatting services, and still directed viewers to contact TELEGRAM-1 (now operating under the Telegram ID @TotalKanyeVictory) to order services.

⁶ Twitch, a subsidiary of Amazon.com, is a service that provides users with the ability to broadcast live video streams of their activities and is primarily focused on video games.

The Torswats Channel continued to post dozens of recordings of swatting calls that had been conducted by the user of TELEGRAM-1. The voice of the caller on the recordings appears to have been generated by a text-to-speech program or otherwise modified to obfuscate the caller's voice. From your co-affiants' review of the calls, your co-affiants know that many use the same voice and introductory statements, making the calls made by TELEGRAM-1 recognizable.

In the first month of activity on the new Torswats Channel, TELEGRAM-1 posted nearly 20 recordings of threats made on calls to emergency services. Your co-affiants are aware of investigations into hoax calls by TELEGRAM-1 in numerous locations, including:

- Anacortes, WA (bomb threat to high school);
- Narberth, PA;
- Norman, OK;
- New Orleans, LA (bomb threat to high school);
- Houston, TX (bomb threat to high school);
- Bethesda, MD (bomb threat to non-government organization that researches extremism); and
- Dubuque, IA (bomb threat to high school).

Based on communications with other law enforcement officers and a review of Dubuque Police Department records, your co-affiants know the following:

- On February 7, 2023, the Dubuque Police Department received a series of threats, including bomb threats against a local high school implicating a specific individual.
- The Dubuque Police Department's determined that a local student had researched Torswats and contacted TELEGRAM-1 via Telegram. The student then purchased and transferred Bitcoin to TELEGRAM-1, as well as providing TELEGRAM-1 with the name and address of the target and the information for the high school in Dubuque.
- The Torswats Channel subsequently posted screen captures of text message exchanges that were sent by law enforcement to the phone number that submitted the threat, indicating the owner of the Torswats Channel was also the likely user of the phone number that was used in the swatting incidents in Dubuque.

Shortly after the arrest of the local student in Dubuque, a post appeared on the Torswats Channel indicating that one of their clients had been arrested. The content on the channel was also deleted. However, within days, the Torswats Channel resumed posting audio recordings of previously conducted swatting calls and resumed advertising swatting services, still directing people to contact TELEGRAM-1 for "orders."

Similarly, on April 13, 2023, Vice News published an article about the Torswats Channel and its use of computer-generated voices. After that article was published, the content on the Torswats Channel was again deleted, but the user resumed posting swatting recordings and advertising services shortly after.

From your co-affiants' review of the audio files posted on the Torswats Channel, your co-affiants know that many of the files used a similar file naming convention such as "Bomb_threat26.mp3 and Bomb_threat27.mp3" or "Swatting_162 and Swatting_163", with the number increasing with each posted recording. This sequential numbering indicates that the poster may have conducted and recorded over 200 swatting or threat calls.

On April 14, 2023, the Torswats Channels were deleted from Telegram. In the following days, new Torswats Channels were created on Telegram, using the Torswats name and imagery while advertising the same services. Posts in these accounts claimed that Telegram shut down the previous channels. Based on your co-affiants' knowledge and experience, your co-affiants know Telegram will occasionally remove accounts and channels for violating its terms of service.

On April 25, 2023, a blogger and self-styled security researcher named Jackie Singh posted an article in which she theorized the identity of the individual who she believed was operating the Torswats Channel (someone other than ALAN FILION). Singh's conclusions are inconsistent with the evidence from the FBI's investigation.

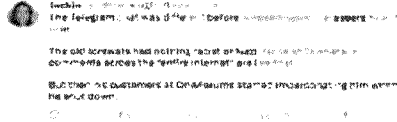
- In response to Singh's posts, the operator of the Torswats Channel proceeded to have an online exchange with Singh on Twitter (now known as "X") and on Telegram.
- During that exchange, Singh challenged whether the current Torswats user was the owner of all the previous Torswats Channels. In response, a post was published on the Torswats Channel showing the Telegram app with multiple Torswats accounts visible, all displaying the same message in draft mode and the caption "here's proof I own all 4 accounts."
- Based on your co-affiants' experience and understanding of the Telegram application, your co-affiants understand this screen capture to demonstrate that a single user does indeed have ownership of all the accounts in question, because only the account owner would be shown "draft" state posts for channels in their user interface.
- A follow-up post showed a screen capture of a computer drop-down selection showing a dozen or more file names titled "Swatting_107" and "Swatting_108" etc. Your co-affiants further understand this indicates the Torswats owner was on a computer or device which contains all the files viewable in the screen shot. The Torswats user also stated they "only save the swatting calls that the customer agrees to let them post" and that they have "others [files] on my laptop." The file names visible are consistent with and known to the investigators as the audio of recorded swatting calls previously recorded and posted to earlier versions of the Torswats Channel. A screenshot of the conversations is reproduced below:

Torswats But Legal

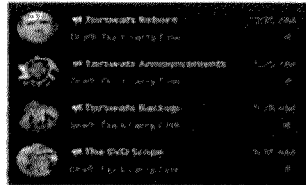


Torswats But Legal

08:34

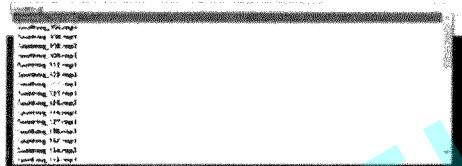


Nah, I'm just more open about my beliefs now in my other channel. if you were in my old Torswats for a while, you would have known that I deleted redpills around early January because it was cluttering up the actual calls and I only had this channel and a backup one. As for politics on the internet, I doubt you've ever showed your political beliefs much.



08:35

Here's proof I own all 4 accounts.



08:37

Which swatting call do you want me to send the prove that it's me? I was transitioning from a robotic TTS/saying I was disabled to my realistic AI voice synthesizer voice for most of the calls. btw I only save swatting calls that the customer agrees to let me post in the channel and I also have others on my old laptop.



Torswats But Legal

08:58

Oh, and the Vice Reporter can certify that I am the "old Torswats". I have his private telegram tag, and also I used a PGP key the "old Torswats" posted to leave encrypted messages that are clearly signed. I did this with the VICE reporter too.

Ideological basis and targeting of victims

While a number of victims targeted by Torswats were the product of conducting swatting as a "service," there is an obvious trend observed in the subject's targeting and his own words, in which victims are chosen due to their sexual orientation and identity, race, or religion. In the above image capturing the discourse between Torswats and Jackie Singh, Singh states how she believed the recent display of Nazi and generally racist ideology was new and might indicate Torswats was not genuine. Torswats counters with how they have always been this way, and they are just more open with their beliefs now.

In some of the earlier Telegram channels operated by TELEGRAM-1, Nazi imagery and anti-Semitic comments, slurs, and conspiracy theories were common. TELEGRAM-1 referred to one target as a "Jewtuber," a portmanteau of the words "YouTuber" and Jewish, describing a YouTube streamer who is Jewish. Additional victims targeted by the subject include a Jewish Children's hospital, a prominent Jewish business mogul Larry Fink, and Volusia County Florida Sheriff Mike Chitwood due to his open denouncement of anti-Semitic actors and groups like the *Goyim Defense League*.

TELEGRAM-1 posted many anti-Semitic comments in various chats such as:

- March 13, 2022: "I want to kill the Redditor brigades [in Ukraine] since they are the embodiment of the midwits in my country who actively support the Zionists and Jews in my government!"
- February 12, 2023: "What if the Holocaust was real. They deserve it. Elimination of Jews would be a net positive effect."
- March 23, 2023: "Kill Jews. Behead Jews. Roundhouse kick a Jew into the concrete. Slam Dunk a Jewish baby into the trashcan. Crucify filthy kikes. Defecate in a Jew's food. Launch Jews into the sun..."
- April 2022, 2023: "Swatters against Judaism."

Additionally, TELEGRAM-1 openly discusses his targeting bias for LGBT victims. TELEGRAM-1 plainly stated, "I send police to the house of people I don't like (fags and transsexuals) for fun." The pattern of activity by the subject supports these claims. VICTIM-1 in Anacortes is an openly gay student at the high school. Another incident in Anacortes sent Police to a home targeting a known "transgender" teacher at the school. Furthermore, the victim in Dallas, Matthew Shank, is gay and promotes this part of his identity on his channels.

In the Spring of 2023, several historically black colleges and universities (HBCU) across the country were targeted with a wave of bomb threat or swatting calls, some leading to significant law enforcement response, which evacuated buildings and interrupted classes. Jackson State University in Jackson, Hinds County, Mississippi, Prairie View A&M University in Prairie View, Waller County, Texas, Florida A&M University in Tallahassee, Leon County, Florida, and St. Philips College in San Antonio, Bexar County, Texas were all among the HBCUs targeted. Posts on the Torswats channel later covered the media response to these incidents.

Identification of the TELEGRAM-1/Torswats Channel User

A recurring theme among many of the monikers used by TELEGRAM-1 is their basis in "The Lord of the Rings" (LOTR) (and additional works) by J.R.R. Tolkien. Within the LOTR canon, the "Ring Wraiths" are dreaded ring-servants of the Dark Lord Sauron, who is the main antagonist in much of Tolkien's combined works. Sauron, had his seat of power set in the kingdom of Mordor, where "black speech" was the native language. "Nazgûl" is the black speech translation for "Ring Wraith." Additionally, "Angmar" was a realm established by the leader [King] of the Nazgûl. Tolkien is known for having created multiple functioning languages which were injected into his literary works. However, "black speech" was one of his least complete languages, leaving variations and liberties taken with its utilization and understanding. Based on extensive research, many of the subject's usernames were clear permutations of black speech words and translations. "Dushatar," for example, translates to "Witch Sorcerer" or "Warlock." "Arn" translates to "King" or "Ruler." "Dusharn" combines these two and translates to "Witch-King." Adding the suffix "-ob" to a proper noun implies "Of", so "Angmarob" would translate to "of Angmar". "Onkmokhob" is a synonym for "of Angmar" as well, etc.⁷

⁷ Translations are per blackspeech.ru, a website and language tool dedicated to the study of Tolkien's "black speech" and its associated canon.

Further analysis of Telegram records revealed TELEGRAM-1 previously utilized the display names “Dushatar,” “Dushatarzotum Angmarob,” “Nazgul,” and “Ring Wraith” among several others. Based on co-affiant Stults’ knowledge and experience, co-affiant Stults knows these names are all related to and derivative of the lore in J.R.R. Tolkien’s *Lord of the Rings*. While “Nazgul” and “Ring Wraith” are more commonly known terms and figures from the books and movies, the terms “Dushatar” and “Angmarob” are much more obscure and are derived from the “black speech” language that Tolkien created within his works. In addition to the usernames utilizing *Lord of the Rings* lore, the Telegram user has also frequently utilized profile images which are pictures or artwork from the *Lord of the Rings*. More specifically, both the user of TELEGRAM-1 and the owner of the Torswats Channel used a picture of a “Nazgul” or “Ring Wraith” from Tolkien’s works as an avatar image.

Investigators also identified a Discord account which used the username “Dushatar” and the profile picture was an image of a “Nazgul.” Records provided by Discord indicate this user previously used the names “Paimon Arnum,” “Paimon Arnum Onkmokhob,” and “Paimon Arnum Angmarob” and the profile had again utilized an image of a “Nazgul” as a profile picture. These again are detailed, obscure ambiguations of words within Tolkien’s “black speech” language, and more specifically, they all relate to the same general figure and region within the lore.

The “Dushatar” Discord account was a member of multiple channels related to an online subculture known as “Foodists.” The term “Foodists” is derived from Internet personality Kai Gallagher, known as “Foodistzen” online. Gallagher gained online notoriety as a YouTuber for his harassment, or “trolling,”⁸ videos and his bad behavior in the comments section of YouTube videos. However, he is more known for making fun of people’s deaths, and for making racist and antisemitic remarks, as well as jokes aimed at homosexuals. Gallagher and members of the “Foodist” community have been subjects of other law enforcement investigations related to, among other things, animal cruelty, child pornography, and online harassment stemming from their actions online. Gallagher himself was the subject of an investigation by law enforcement for calling in hoax threats to his school and making threats online. Two of the Discord channels in which “Dushatar” was present also had the same “foodistzen” user as a member or administrator for the channel. The “foodistzen” Discord user had a profile picture that is a real photo of Gallagher as well as profile information that linked to the YouTube account known to be operated by Gallagher.

In March 2023, TELEGRAM-1 (using the ID name “Dushatar”) was observed discussing swatting in the “Sim Land” Telegram channel. During this conversation TELEGRAM-1/“Dushatar” stated “I’m a Foodist” and mentioned “Kai Gallagher” by name. Based on your co-affiants’ training and experience, your co-affiants know it to be common for individuals online to use the same or very similar usernames across multiple platforms and services. Given the knowledge of and self-identification as a “foodist” by TELEGRAM-1/“Dushatar” and also the presence of a “Dushatar” user in the niche “foodist” community on Discord, it is logical and probable that these two accounts are operated by the same person.

⁸ Internet trolling consists of deliberately posting inflammatory, irrelevant or offensive comments or by harassing, criticizing or antagonizing someone online, especially by provocatively disparaging or mocking public statements, postings or acts.

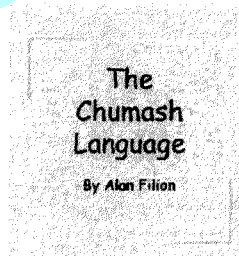
In April 2023, pursuant to legal process, Discord provided IP address⁹ information for the Dushatar Discord account. The most frequently occurring login IP addresses were 45.134.140.68 (hereinafter, IP-1) and 172.248.228.30 (hereinafter, IP-2). IP-1 is associated with a Virtual Private Network (VPN).¹⁰ Specifically, IP-1 is associated with OVPN Integritet AB, a “privacy friendly VPN provider” registered in Sweden, with servers hosted in the United Kingdom. IP-2 resolved to a residential Internet Service Provider (ISP), Charter Communications, in Lancaster, Orange County, California.

Internet searches for the unique username “Paimon Arnum” revealed a single relevant result: a YouTube account. Google search results also showed that the account previously utilized the name “Ringwraith.” This YouTube account was later updated to use the name “Angmar E-News.” “Angmar” is another word that co-affiant Agent Stults knows to be derived from Lord of the Rings “black speech.” Additionally, the Angmar E-News page used a “Nazgul” profile picture for its page.

Google showed that the YouTube account “Paimon Arnum” which was previously known as “Ringwraith” was tied to a specific Google Gmail account (hereinafter, GOOGLE-1). IP login information for said Google account showed that, like the Dushatar Discord account, said Google account was accessed from IP-1. The creation IP address for the YouTube account was 104.173.83.179 (hereinafter, IP-3). IP-3 resolved to the same residential ISP as IP-2: Charter Communications in Lancaster, Orange County, California.

According to Charter Communications, at the relevant times, both residential IP addresses identified above (IP-2 and IP-3) were assigned to the same residential address and subscriber: William Filion, age 62, and the subscriber address is 43732 Andale Ave, Lancaster, CA 93535. According to Los Angeles County Sheriff’s Department records, William Filion has a son named ALAN FILION, age 17. ALAN FILION’s California driver’s license, issued on January 3, 2023, lists his home address as 43732 Andale Ave, Lancaster, CA 93535.

On May 5, 2023, the Honorable S. Kate Vaughan, a United States Magistrate Judge for the Western District of Washington, authorized a search warrant for GOOGLE-1. The account records included the following image:



⁹ Based on your co-affiants’ training and experience, your co-affiants know that an Internet Protocol version 4 address, also known as an “IPv4 address,” or more commonly “IP address,” is a set of four numbers, each ranging from 0 to 255 and separated by a period (“.”) that is used to route traffic on the internet. A single IP address can manage internet traffic for more than one computer or device, such as when a router in one’s home routes traffic to one’s desktop computer, as well as one’s tablet or smartphone, while all using the same IP address to access the internet. Use of a common IP address typically shows the use of shared or common computer infrastructure or use of the same physical space to connect to the internet.

¹⁰ A VPN is a mechanism for creating a secure, encrypted connection between a computer and a network. VPNs are commonly used as a means to obscure the true IP address of a computer connecting to the internet.

The user activity for GOOGLE-1 included numerous visits to a Google Books link for the book *Celebrating Middle-Earth: The Lord of the Rings as a Defense of Western Civilization*. The user activity for GOOGLE-1 also included approximately 100 visits to YouTube videos about swatting, and approximately 20 visits to YouTube videos about bomb threats and active shooter threats against schools.

Google records also showed that the following accounts were linked to GOOGLE-1 by cookies:¹¹

	Google Account ID	Email Address	Username
GOOGLE-2	300049661816	alanfilion1@gmail.com	Alan Filion
GOOGLE-3	1040481640640	johngreenisnotagoodhistorian@gmail.com	Void King
GOOGLE-4	714568183108	kingedward1488@gmail.com	Darth Nihilus
GOOGLE-5	53181346134	unfteamgalactic@gmail.com	Unofficial Team Galactic
GOOGLE-6	896202216141	56295909546390346a@gmail.com	df d

GOOGLE-1, GOOGLE-3, and GOOGLE-6 share the same recovery phone number: +1 (661) 480-8900. Verizon records show that the subscriber associated with that recovery phone number is William Filion, and the registered subscriber address is in Chicago, Illinois. Even though the listed subscriber address is in Chicago, Verizon records indicate that most phone calls from this phone number originated from Lancaster, California.

GOOGLE-2, GOOGLE-3, and GOOGLE-4 were consistently accessed with the same Android device ID: 3c45583fc7302278, indicating that the same physical device was used to access them.

The predominant IP addresses used to login into all these Google accounts were 45.134.140.68 (IP-1) and 45.83.89.132 (IP-4), both of which resolve to the Swedish VPN provider OVPN.

One of the other IP addresses used to access GOOGLE-1 was IP address 185.86.106.168 (hereinafter, IP-5), which also resolves to OVPN. IP-5 was tied to several swatting calls made from October 2022 to January 2023. Records from TextNow for the following phone numbers used in swatting incidents showed that those numbers were linked to IP-5:

PHONE NUMBER	DATE	IP ADDRESS	CALL DESTINATION
213-822-3439	2021-10-29	185.86.106.168 (IP-5)	Rapid City, SD
904-531-0273	2022-10-02	185.86.106.168 (IP-5)	Grapevine, TX
707-300-8041	2022-10-13	185.86.106.168 (IP-5)	San Antonio, TX
680-888-6086	2023-01-29	185.86.106.168 (IP-5)	Sacramento, CA
213-212-4038	2023-01-30	185.86.106.168 (IP-5)	Lansdale, PA

Although IP-1, IP-4, and IP-5 are public IP addresses that could be associated with numerous users throughout the world, the consistent use of OVPN IP addresses across several relevant accounts (Discord, Google, and TextNow) strongly suggests and leads to a reasonable conclusion that these accounts are all controlled by the same user who is using a VPN service (specifically, OVPN) to access his or her accounts. This conclusion is supported by the numerous incidents of OVPN IP overlap observed between linked Google accounts, such as:

¹¹ From your co-affiants' training and experience, your co-affiants know that providers of email, social media, and file storage services often track the behavior and activities of persons using accounts by using cookies, which are strings of characters and numbers stored on a person's computer on their web browser. These cookies can often show whether more than one account was accessed by the same computer (and specifically the same web browser), as the provider can recognize that cookie when the same device returns to the service to access an account.

ACCOUNT	DATE/TIME (UTC)	IP ADDRESS
GOOGLE-4	2022-11-21 05:27:09	45.83.89.132 (IP-4)
GOOGLE-5	2022-11-21 05:26:47	45.83.89.132 (IP-4)
GOOGLE-3	2022-11-21 05:26:36	45.83.89.132 (IP-4)
GOOGLE-2	2022-11-21 05:26:24	45.83.89.132 (IP-4)

ACCOUNT	DATE/TIME (UTC)	IP ADDRESS
GOOGLE-1	2022-10-25 04:09:06	45.134.140.68 (IP-1)
GOOGLE-6	2022-10-25 04:08:34	45.134.140.68 (IP-1)
GOOGLE-3	2022-10-25 00:01:10	45.134.140.68 (IP-1)
GOOGLE-2	2022-10-25 00:00:43	45.134.140.68 (IP-1)

Other Similarities and Characteristics of Calls

Another frequently used theme by TELEGRAM-1 and the calls placed, was the implication of Wayne Lambright. Lambright is an obscure internet figure, coming to notoriety in some circles due to his appearances on the message board “4chan,” where he would post anti-Semitic comments, conspiracy theories, and outlandish political commentary under his true name. This led to Lambright becoming a running joke among others online; especially as his eccentric presence continued to develop, to include his candidacy for President in 2020.

Lambright has since become the victim of aggressive online “trolling” and a frequent target to be implicated by swatting calls around the country. Lambright resides in Desert Center, CA, and his name and address have been utilized by TELEGRAM-1 several times in various chats as well as in multiple hoax calls made by ALAN FILION. TELEGRAM-1 even explains he has swatted him “about 29 times 20 times the cops showed up”.

Another recurring trope of the calls placed by ALAN FILION is the articulation of weapons possessed or involved in the alleged crime. In multiple calls it is reported the subject has “an illegally modified AR-15,” a “Glock-17,” and “pipe bombs.” While being commonly known firearm models, this pattern of identifying the firearm types within the call, is still unique. Based on your co-affiants’ experience in law enforcement, your co-affiants believe the subject identifies vague weapons such as “AR-15” and “pipe bomb” to escalate the level of perceived threat by the emergency response, understanding the presence of rifle caliber firearms and explosives would typically mobilize a higher tier response.

Furthermore, ALAN FILION often makes references to satanism, the Order of Nine Angles (O9A), or Temple of Blood (TOB) in his calls. Based your co-affiants’ training and experience, you co-affiants know O9A and TOB to be satanist organizations, one an offshoot of the other, which came to notoriety due to several members also being neo-nazis who had been arrested by the FBI. Your co-affiants believe ALAN FILION utilized these satanist references in a tongue-in-cheek manner, attempting to make the calls seem more intimidating while also seeing how farfetched his threat calls could sound.

ALAN FILION Places Swatting Call to Seminole County, Florida Mosque

On May 12, 2023, the Sanford Police Department in Sanford, Seminole County, Florida, received a call from ALAN FILION representing himself as a gunman. ALAN FILION stated he had a fully automatic rifle and was entering the Masjid Al Hayy Mosque (located at 786 Myrtle Street, Sanford, Seminole County, Florida) to conduct a mass shooting. The caller utilized language consistent with previous known calls from ALAN FILION. The caller made references to Satanism and stated he had “an illegally modified AR-15, and Glock 17, and pipe bombs...” In conjunction with his statement, ALAN FILION began playing audio of gunfire in the background to elicit an emergency response. In response to the call, the Seminole County Sheriff’s Office had approximately 30 law enforcement officers respond to the Masjid Al Hayy Mosque. After arriving on scene, and making contact with the mosque staff, it was determined this was a swatting incident.

Other Evidence Further Identifies ALAN FILION as the May 12, 2023 Caller

On June 22, 2023, the Honorable Brian A. Tsuchida, a United States Magistrate Judge for the Western District of Washington, authorized a search warrant for GOOGLE-2, GOOGLE-3, GOOGLE-4, GOOGLE-5 and, GOOGLE-6. The account records revealed monikers that have been used by ALAN FILION in other accounts, like Paypal and eBay. The records included the following LOTR-related usernames:

- StraightOuttaAngmar
- Sauron
- WitchKingofAngmar
- AngmarRingwraith
- Angmarian
- Void King
- Ringwraith
- Scarlet King
- XPOLITER SAURON

The user activity for GOOGLE-3 had relevant search history, including but not limited to:

- Wayne Lambright
- Knights templar worshipping Satan
- Witch king of angmar
- How many jews are in the US
- Bitcoin logarithmic chart
- OVPN application
- Satanic Rituals
- Searched for: *“Execute them. Kill them. Behead them. Roundhouse kick them into the concrete. Slam dunk them into the trashcan. Crucify them. Curb stomp them. Report them to the IRS. Twist their heads off. Crush their heads in the trash compactor. Liquefy them in a vat of acid. Exterminate them in the execution chamber. Stomp their skulls with steel toed boots...”*
- Criminal mastermind swatting
- Doxbin
- Blackrock and Vanguard are taking over centralized food...

- George Soros House
- Google translate English to Russian
- Misgendering mental illness
- SSN generator
- Arm a pipe bomb
- How to dox
- All racial slurs
- Text to speech for phone call

The user activity for GOOGLE-3 included numerous emails from cryptocompanies, like CoinPayments, CoinGate, and Crypto.com. Also included in the email activity was emails from several companies about logins from new locations, based on IP addresses. Some of the IP addresses listed were IP-1, IP-2, IP-4, and IP-5.

Investigators also reviewed publicly available records for the TELEGRAM-1 account. TELEGRAM-1 posted a message on April 21, 2022 “SOMEONE JUST REPORTED ME TO THE FBI... LOL!” Additionally, another message was posted by TELEGRAM-1 in Russian on April 28, 2022. Translated to English, the message reads: “Besides, which of you faggots sent the DAMN FBI to my door? I had two FBI agents say that they had received information that I was going to blow up the school.”

FBI records indicated Agents had indeed conducted an interview with William Filion, ALAN FILION’s father, at 43732 Andale Ave, Lancaster, Orange County, California 93535 on April 21, 2022, in relation to a separate investigation. Although separate, the incident was also regarding a school bombing threat made by a discord user with the name “Witch King of Angmar” (again consistent with a username derivative of Tolkien’s works), who’s Discord account IP information had resolved to Charter Communications at the Andale Ave. address in Lancaster. During this interview, William Filion falsely stated nobody else lived at the residence.

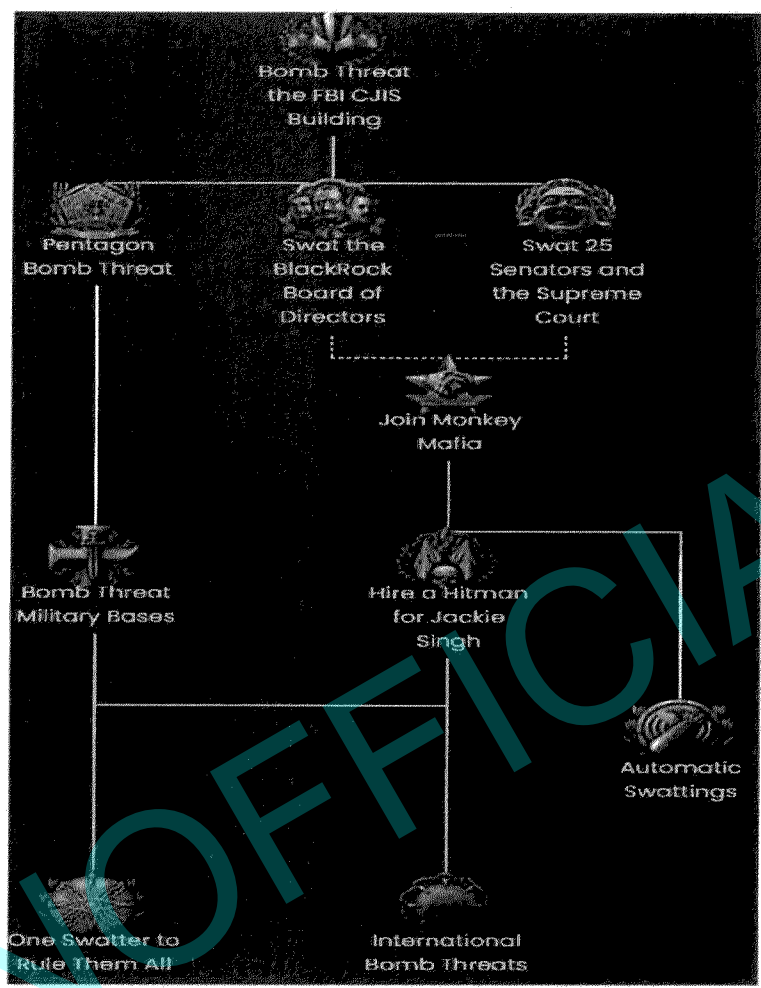
However, a review Lancaster police records for incidents at 43732 Andale Ave, Lancaster, CA 93535 show there were swatting calls placed against the residence on 9/23/22, 9/25/22, 10/13/22, 10/16/22, 10/17/22, 10/31/22, 11/7/22, 11/24/22, and 12/7/22. The modus operandi described in the police reports for these calls is consistent with other swatting calls posted by TELEGRAM-1. ALAN FILION was party to an interview during the law enforcement response to one of these incidents.

The user of TELEGRAM-1 has made several posts about swatting himself, including:

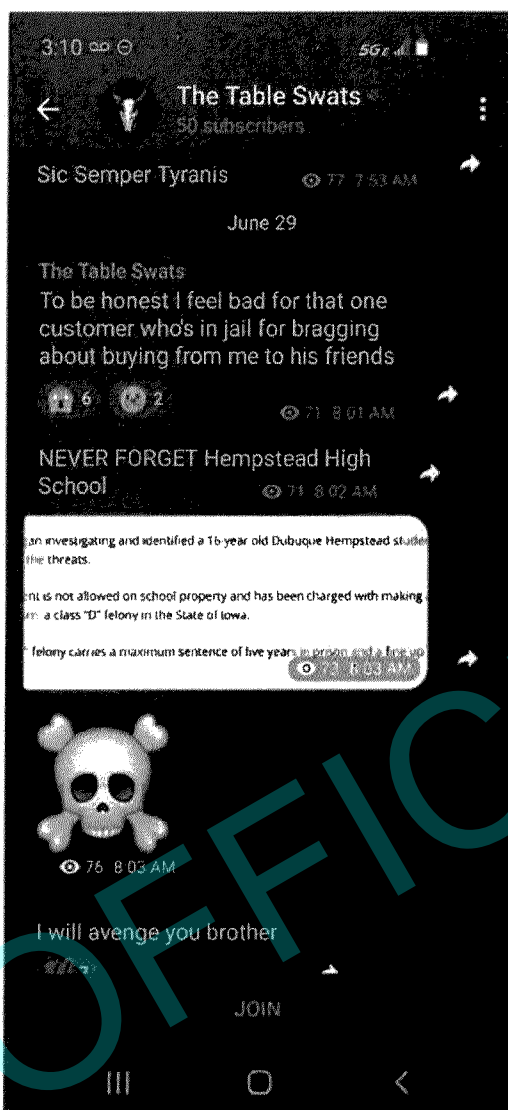
- 2/24/23 – “I actually swatted myself with my method”
- 2/25/23 – “I swatted myself like 3 times”
- 2/25/23 – “When I swatted myself the cops’ extreme reaction was due to my special scenario”
- 3/10/23 – “I swatted myself. How would I know my methods work otherwise. Swatting my neighbor means I’m in suspicion. But nobody would ever dare swat himself, right?”

On June 28 and June 29, 2023, an FBI Criminal Justice Information Services (CJIS) Division Section Chief spoke to NBC News about the FBI’s national online database to facilitate information sharing about swatting incidents between departments and law enforcement agencies across the country. NBC News published an online article about the new database.

On or about June 30, 2023, the user of TELEGRAM-1 and the Torswats Channel (now operating under a new Telegram user ID and within a new swatting-related Telegram channel) made the following publicly available post:



Investigators connected the new Telegram User ID with the user of TELEGRAM-1 and the Torswats Channel based on unique identifiers such as the continuing references to *Lord of the Rings* lore, the dispute with Jackie Singh, and the following publicly available Telegram post referencing the swatting/threats call to a high school in Dubuque, Iowa, after which a student was arrested for soliciting the call (the incident attributed to ALAN FILION discussed above).



On June 30, 2023, a male called the West Virginia Harrison-Taylor County 911 Center non-emergency line stating he had stashed three dozen pipe bombs around the Criminal Justice Information Services (CJIS) Division that were set to detonate in 30 minutes. The CJIS facilities were cleared with no explosives found.

In the days that followed, the FBI CJIS Section Chief, FBI Pittsburgh Special Agent in Charge, FBI Oklahoma City Special Agent in Charge, and the FBI San Antonio Special Agent in Charge were all targeted by swatting calls. The voice on these calls were all consistent with the voice in the May 12, 2023, Sanford, Florida call, indicating it was the same caller.

Based on this flurry of recent swatting activity and the Telegram user's stated plans for future swatting calls, investigators know ALAN FILION is responsible for these recent swatting incidents involving FBI personnel and is likely to make threats against U.S. Senators and the Supreme Court.

The FBI Serves Search Warrant at ALAN FILION's Residence

On July 15, 2023, the FBI served a search warrant on ALAN FILION's residence in Lancaster, California. A number of phone and computer devices were seized. Analysis of the devices provided several relevant items including:

- A Samsung phone with a screen capture of the device actively utilizing the OVPN service and connected to IP-4.
- Several screen captures of Telegram activity, to include a message to user named "Wayne Lambright" stating "I swatted you".
- Images previously observed on the Torswats Telegram channel.
- Several connected email addresses previously identified in the aforementioned Google warrant for ALAN FILION's account.
- Multiple Google Maps queries of various high schools.
- Dozens on identifiers for Yahoo messenger containing relevant names such as "LordSauron" as well as racial slurs and bigoted names consistent with language and behavior observed by Torswats.

Subsequent to the warrant being served on their residence on July 15, 2023, ALAN FILION and his father, William Filion, participated in a voluntary, non-custodial interview. ALAN FILION explained he has seen the movies and read the Lord of the Rings books, but did not provide detail beyond that. Additionally, he knew who Kai Gallagher was and was familiar with the niche 'Foodist' community and its material. ALAN FILION even provided a nuanced explanation of the Foodists to his father, who knew nothing about the community. ALAN FILION and his father explained how they felt they were victims in the situation and were being treated unreasonably, given they had been swatted themselves in the past. It was explained to William Filion how his son, ALAN FILION, was responsible for swatting his residence, citing the statements ALAN FILION had made online about swatting himself. William became confused, and ALAN FILION denied the claim, becoming visibly upset, telling his father the Agents were lying, and ultimately choosing to terminate the interview.

After the interview was terminated, but while Agents were still in the process of the search, ALAN FILION voluntarily approached an Agent asking if the agent would need to take a sample of his voice to cross reference with the calls.

Having been in the presence of ALAN FILION and spoken to him at length, Agents executing the search warrant believe ALAN FILION's voice is recognizable as the same voice heard in the calls made to Sanford, Florida, and multiple other locations.

Based on the aforementioned facts and circumstances there is probable cause to believe Alan Winston Filion did commit the offenses of **False Report Concerning Planting of Bomb, Explosive or Use of a Weapon of Mass Destruction or Concerning the Use of Firearms in a Violent Manner While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim**- Florida Statutes: 790.163, 775.31, 775.085, (Felony of the First Degree Punishable by up to 30 years in prison), **Unlawful Use of a Two-Way Communication Device While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim** - Florida Statutes: 934.215, 775.31, 775.085, (Felony of the Second Degree Punishable by up to 15 years in prison), **False Report to Law Enforcement Concerning Commission of a Capital Felony While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation,**

National Origin, Homeless Status or Advanced Age of the Victim - Florida Statutes: 837.05(2), 775.31, 775.085, (Felony of the Second Degree Punishable by up to 15 years in prison), False Report to Law Enforcement Causing Public Safety Agency Response (Swatting) While Facilitating or Furthering an Act of Terrorism or While Evidencing Prejudice Based on the Race, Color, Ancestry, Ethnicity, Religion, Sexual Orientation, National Origin, Homeless Status or Advanced Age of the Victim - Florida Statutes: 817.49, 775.31, 775.085, (Felony of the Third Degree Punishable by up to 5 years in prison).

Further, your co-affiants respectfully request that this Affidavit for Arrest Warrant be SEALED until further order of the Court.


FIRST CO-AFFIANT'S SIGNATURE

Agent Michael Stults
FIRST CO-AFFIANT'S NAME

SWORN TO AND SUBSCRIBED before me this 12 day of January, 2024.

Natalie Leavitt, Special Agent, FBI
NAME AND TITLE OF INDIVIDUAL RECEIVING OATH

- Affiant Personally Known
 Affiant Produced Identification

Type of Identification: _____


SECOND CO-AFFIANT'S SIGNATURE

Detective Hunter Corchado
SECOND CO-AFFIANT'S NAME

SWORN TO AND SUBSCRIBED before me this 16 day of January, 2024.

 SERGEANT
NAME AND TITLE OF INDIVIDUAL RECEIVING OATH

- Affiant Personally Known
 Affiant Produced Identification

Type of Identification: Florida Driver License and Seminole County Sheriff's Office Identification