

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America)

v.)

Alexander Lightner)

Case No.)

8:24-MJ-1028AAS)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Dec 29, 2023 to Jan 5, 2024 in the county of Sarasota in the Middle District of Florida, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 875(c) and 26 U.S.C. § 5861(d) with their respective offense descriptions.

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.

Handwritten signature of Ronald Daniels

Complainant's signature

Special Agent Ronald Daniels, FBI

Printed name and title

Sworn to me over the telephone consistent with FRCP 4 & 4.1.

Sworn to before me and signed in my presence

Date: January 5, 2024

Handwritten signature of Amanda A. Sansone

Judge's signature

City and state: Tampa, Florida

AMANDA A. SANSONE, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Ronald Daniels, having been duly sworn, hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been employed in this capacity since September 2015. I am currently assigned to the Sarasota Field Office. In my capacity as a Special Agent, I have investigated various crimes, including crimes involving racially or ethnically motivated violent extremism and those involving the transmission of interstate threats to injure and crimes involving illegal possession of firearms. I received training in obtaining probable cause, surveillance techniques, the interviewing of subjects and witnesses, and the planning and execution of arrest, search, and seizure warrants.

2. I submit this affidavit in support of a criminal complaint charging ALEXANDER LIGHTNER (“LIGHTNER”), DOB 8/26/1997, with violations of 18 U.S.C. § 875(c) (transmitting in interstate commerce a threat to injure) and 26 U.S.C. § 5861(d) (possession of an unregistered firearm).

3. I make this affidavit from personal knowledge based on my participation in the investigation, information from law enforcement officers, and information gained through my training and experience.

4. Because this affidavit is submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint, I have not

set forth each and every fact that I learned as a result of this investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause that a violation of federal law has been committed. Unless otherwise noted, all statements of other persons described in this affidavit are set forth in substance and in part, rather than verbatim.

PROBABLE CAUSE

5. On or about December 29, 2023, on an Internet messaging platform, the user [REDACTED] made several concerning posts that, taken together, were intended to convey the message that he was planning to conduct a racially or ethnically motivated mass casualty event:

- a. "2024 there shall be saints u fuq"
- b. "Highscore shall be defeated"
- c. "I'll delete this, but I say to you there is no surrender only death. Only purpose"
- d. "When my @ says last seen a week ago remove me from everything."
- e. "It's so over. It's so begun."
- f. "It's called a .308 black tip."
- g. "I've spectator (sic) 15+ years, as a pushy, reluctant teacher better, role, fulfilled? Fuck all yall. I am greater. I tried life as the system commands. It did not work. Now you shall she (sic) 15 years of obligation. Of duty. Of role. Of leadership. Of teaching. Mentoring. Duty. Honor. Those that know me know. It's over, you have not seen the wrath of the Aryan that has no purpose left."

6. Based on my training, experience, and/or knowledge of this investigation, I know that a “saint” is an individual who commits an act of violence in furtherance of white supremacist and accelerationist goals. Following the commission of an act of violence in furtherance of the white supremacist and accelerationist goals, an individual may be “sainted.”

7. In my training and/or experience, I believe that “highscore” is a reference to the death toll amassed by an attacker who commits an act of mass violence.

8. Based on my training and/or experience, I believe that when ██████████ referred to a .308 blacktip, he was referring to a type of ammunition.

9. Through subsequent investigation, the FBI identified the user of ██████████ as LIGHTNER, a 26-year-old male residing at a residence on Lemon Bay Drive, Venice, Florida (the “RESIDENCE”).

10. On or about January 5, 2024, law enforcement executed a search warrant at the RESIDENCE. Upon search of the RESIDENCE, agents found a firearm silencer that is approximately 6 to 7 inches long in a laundry hamper in LIGHTNER’s bedroom, which LIGHTNER shares with his brother. The device does not appear to have serial numbers or markings in reference to a maker or manufacture.

11. At the foot of LIGHTNER’s bed, agents also found .308 ammunition, which is the ammunition mentioned in ██████████ posts. There were also multiple firearms in LIGHTNER’s room.

12. During the search, Federal agents also found propaganda regarding white supremacist and accelerationist ideology in LIGHTNER's bedroom. Specifically, there was propaganda found in LIGHTNER's bedroom near his bed discussing "saints," as defined above.

13. Additionally, during the execution of the search warrant, LIGHTNER was interviewed by FBI. During the interview, LIGHTNER admitted to being the user of the account [REDACTED] and making the December 29, 2023 posts discussed above. LIGHTNER also told federal agents that no other person has access to that account.

14. LIGHTNER also told federal agents that he was drunk when he made the December 29, 2023, [REDACTED] posts, but he remembered making the posts. LIGHTNER said he made the posts because he wanted attention from the online community. He also told federal agents that the reference to "saint" inferred that he would become a "saint" after his death. As explained above, a "saint" is an individual who commits an act of violence in furtherance of the white supremacist and accelerationist goals.

15. LIGHTNER also admitted that the silencer found in his bedroom laundry hamper belonged to him. According to LIGHTNER, he made the silencer when he was twelve-years old.

16. Photographs of the silencer recovered from LIGHTNER's bedroom were provided to a Bureau of Alcohol, Tobacco, Firearms, and Explosives expert, who determined that the silencer appears to qualify as a "firearm" under 26

U.S.C. § 5845(a)(7). A records search shows no registration of any firearm or silencer by LIGHTNER in the National Firearms Registration and Transfer Record as required by Title 26, United States Code.

CONCLUSION

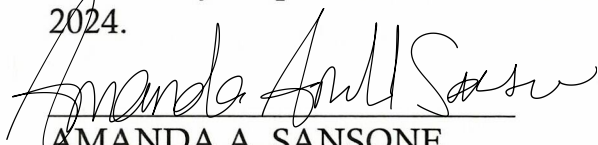
17. Based on the foregoing information, I respectfully submit that probable cause exists to believe that Alexander LIGHTNER knowingly violated 18 U.S.C. § 875(c) (transmitting in interstate commerce a threat to injure) and 26 U.S.C. § 5861(d) (possession of an unregistered firearm). Accordingly, I request issuance of the proposed Complaint and Arrest Warrant.

This concludes my affidavit.



Ronald Daniels
FBI Special Agent

Affidavit submitted by reliable electronic means and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 this 5th day of January, 2024.



AMANDA A. SANSONE
United States Magistrate Judge