IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF ALABAMA

IN THE MATTER OF THE APPLICATION FOR AN ARREST WARRANT FOR ALEXANDER HILTON RANDLES

Case No.24-mj-298

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Elaine Kimiyo Brown, Special Agent with the Federal Bureau of Investigation ("FBI"), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am a Special Agent with the FBI and I have been since February 13, 2022. As a federal law enforcement agent, I am authorized to investigate violations of United States laws. I am currently assigned to the Mobile Division, Counter-Terrorism Squad.
- 2. I have personally participated in the investigation discussed below. I am familiar with the facts and circumstances of the investigation through my personal participation, from discussions with other law enforcement officers, discussions with others involved in this investigation, and from my review of records, reports, and data obtained during the course of this investigation. Since this

affidavit is being submitted for the limited purpose of securing a criminal complaint,

I have not included details of every aspect of the investigation.

3. This affidavit is submitted in support of a criminal complaint against the following individual:

ALEXANDER HILTON RANDLES,

charging him with interstate transmission of a threat to kidnap or injure, which is a violation of **Title 18**, **United States Code**, **Section 875(c)**.

4. Section 875(c) makes it a crime for any person to transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, with the intent to communicate a true threat or with knowledge that it would be viewed as a true threat.

SUBJECT BACKGROUND

- 1. The following subject background information contains First Amendment protected speech; inclusion of this information is not intended to implicate the subject's protected speech, such as letters written to the FBI, as derogatory in and of themselves. It is intended to show context.
- 2. Since 2020, RANDLES has reported to multiple law enforcement agencies and court systems that he is the victim of an unknown domestic terrorist group's efforts to defame his name, harm his tire-changing business, and infect him with a sexually transmitted disease. Since his initial reports, RANDLES has begun

reporting that law enforcement officers, court systems, friends, and others in his life are all acting in conspiracy with the unknown domestic terrorist group to cover up the unknown domestic terrorist group's efforts and crimes against him.

3. On July 27, 2023, RANDLES filed a report to Foley Police Department that a doctor at ENT Center of Excellence was conspiring with the unknown domestic terrorist group and had falsified his medical records in order to obfuscate evidence that the group had infected him with a deadly disease.

ON THE LISTED DATE AND TIME, I RESPONDED TO THE FRONT LOBBY OF THE FOLEY JUSTICE CENTER TO SPEAK WITH MR. RANDLES. HE ADVISED THAT BACK IN 2021 HE WAS THE VICTIM OF A BIOLOGICAL TERRORISM ATTACK VIA AN UNKNOWN VIRUS. HE ADVISED THAT THE VIRUS CAUSED A DISEASE IN HIS BODY WHICH EVENTUALLY LED HIM TO ENT CENTER OF EXCELLENCE HERE IN FOLEY WHERE HE HAD A PROCEDURE DONE TO FIX THE ISSUE. HE ADVISED DURING THE PROCEDURE THEY REMOVED HIS TONSILS AND A TUMOR IN HIS THROAT.

MR. RANDLES ADVISED THAT THE DOCTOR DIAGNOSED TONSILLITIS HOWEVER HE BELIEVES IT TO BE A MORE

SERIOUS, LIFE THREATENING DISEASE. HE ADVISED THAT HE HAS PROOF THAT IT IS NOT TONSILLITIS ON THE

FLASH DRIVE HE GAVE ME. HE ADVISED THAT HE BELIEVES THAT THE DOCTOR IS WORKING WITH THE PEOPLE WHO

COMMITTED THE TERRORIST ACT ON HIM SEVERAL YEARS BACK AND ASKED FOR THE FOLEY POLICE DEPARTMENT TO

INVESTIGATE THIS FURTHER.

4. On January 30, 2024, RANDLES attempted to place Dr. Keith Kowal (KOWAL) of ENT Center of Excellence under citizen's arrest at his doctor's office, because RANDLES believed KOWAL had falsified medical documents in an effort to conceal that the unknown domestic terrorist group had infected him with a deadly disease. When he went into the office and requested KOWAL to submit himself to citizen's arrest, RANDLES was armed with a pistol and handcuffs. Foley Police Department responded and spoke to RANDLES, who was waiting in his car in the doctor's office parking lot; they saw that he possessed a pistol and handcuffs, and

that he had a rifle in his car's trunk. Responding officers told RANDLES that they would handle the investigation from that point, and RANDLES left without incident.

	GFS # 202402270
	Caller Statement: MALE CAME IN, SAYING HE NEEDED TO ARREST THERE DR AND LEFT. POSSIBLY STILL IN
	THE PARKING LOT.
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Į	OFFICERS REPONDED FOR A SUSPICIOUS MALE, CONTACT WAS MADE WITH MR.RANDLES WHO ADVISED HE WAS THERE
RR/	TO MAKE A CITIZENS ARREST ON DR. KEITH KIWAL, THIS BEHAVIOR CAUSED STAFF AND MANAGEMENT TO FEEL
M	UNSAFE IN RESULT THEY BARRED MR. RANDLES FROM THE PROPERTY. MR.RANDLES WAS ADVISED OF SUCH.

OFFICERS RESPONDED FOR A SUSPICIOUS MALE. AFTER SPEAKING WITH STAFF OFFICERS WERE ALERTED THAT A
MALE OUTSIDE IN A BMW WAS POSSIBLY THE SUBJECT IN QUESTION. WE MADE CONTACT WITH THE MALE AND HE
WAS IDENTIFIED AS ALEXANDER RANDLES AND WAS IN FACT THE SUBJECT IN QUESTION. HE ADVISED HE WAS
THERE TO AFFECT A CITIZENS ARREST ON DR KEITH KOWAL FOR HINDERING PROSECUTION AND OBSTRUCTING
GOVERNMENT OPERATIONS. HE WAS ARMED WITH A PISTOL AND POSSIBLY ANOTHER UNKNOWN WEAPON IN THE TRUNK.

SUBJECT ALSO HAD HANDCUFFS. HE STATED DR KOWAL PREVENTED HIM FROM BEING ABLE TO TAKE CIVIL ACTION
ON INDIVIDUALS IN OHIO WHO POISONED HIM WITH ORAL HERPES BY WAY OF A PROSTITUTE THAT HE HAD AN
ENCOUNTER WITH. HE STATED THE DR PURPOSELY FALSIFIED DOCUMENTS PERTAINING TO HIS TREATMENT AFTER
ONLY DIAGNOSING HIM WITH TONSILLITIS. MR.RANDLES WAS DEAD SET ON HAVING PROBABLE CAUSE ON DR KOWEL
AND WAS INSISTING ON MAKING THE ARREST ON HIM OR ANYONE HE FELT GOT IN THE WAY OF IT. OFFICERS
TALKED HIM INTO ALLOWING OUR DETECTIVES TO INVESTIGATE FOR HIM AND DO THE LEG WORK ON THE CASE. HE
STATED HE PREVIOUSLY MADE A REPORT REGARDING THE ISSUE HOWEVER WE COULD NOT CONFIRM AT THE TIME OF
REPORT. MR.RANDLES STATED HE WAS UNDER VA CARE AND DID SEEM TO POSSIBLY BE A MENTAL HEALTH CONSUMER
HOWEVER NO RECORD OF SUCH WAS FOUND. HE WAS BARRED BY JESSICA MILLER, MANGER. HE WAS ADVISED OF
SUCH.

5. On February 02, 2024, RANDLES went to Foley Police Department, where he spoke with Sergeant Robert Fennell (FENNELL) regarding his concern with the doctor's office. At that time, RANDLES described to FENNELL his belief that an unknown organization had sent a woman to infect him with herpes and that he believed the doctor's office had falsified his medical records. He went on to say that "if the police did not rectify this matter in a timely manner, he will be forced to take matters into his own hands" and that "if police tried to stop him, they would be

in violation of the law and he would meet them with whatever force needed to accomplish his task."

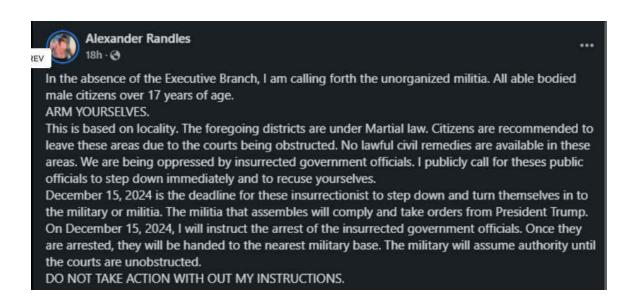
- a. (Date: Presently) He made contact with doctors office in Foley on 1-30-24 and made statements that he intended to place the doctor under citizen's arrest for obstruction of justice. Officers responded and discovered that he was armed with a handgun, had a rifle in the trunk of his car and handcuffs. He eventually left without incident, but was permanently barred from the property. The doctor's office was fearful for their safety. I spoke with him on 2-2-24 and he thinks an unknown organization recruited or hired a woman to give him herpes. He thinks the doctors office falsified documents and that he has the authority to place the doctor and anyone that stands in his way under arrest. He stated that if the police do not rectify this matter in a timely manner, he will be forced to take matters into his own hands. He also stated that if police tried to stop him, they would be in violation of the law and he would meet them with whatever force needed to accomplish his task. Respondent said he was seen by the VA in Pensacola once and prescribed medications but he did not like the way it made him feel so he did not take it any more. Respondent is a danger to himself and members of the public.
- 6. On February 06, 2024, FENNELL submitted a petition for involuntary commitment to Baldwin County Probate Court. RANDLES was subsequently taken into custody on February 09, 2024, where he was evaluated by a mental health professional and subsequently ordered to involuntary commitment at the Department of Mental Health or designated facility for diagnosis and treatment by Baldwin County Probate Judge Harry D'Olive, Jr. RANDLES was then involuntarily committed to an inpatient treatment facility for evaluation and was released on or about February 26, 2024.

PROBABLE CAUSE

Interstate Transmission of a Threat to Kidnap or Injure

- 1. On or about October 23, 2024, RANDLES posted multiple court documents that requested legal process from the United States Court of Appeals for the Eleventh Circuit, to include a petition for writ of mandamus towards multiple local government officials (e.g., Baldwin County Probate Judge Harry D'Oliver Jr.) and a complaint against those same local government officials, on www.facebook.com/alex.randles.9 (his Facebook account).
- 2. On or about November 25, 2024, a caption for a Facebook post on RANDLES' Facebook account called for an "unorganized militia," for able-bodied men over seventeen years of age to arm themselves, and that "foregoing districts" were under martial law. In this same caption, RANDLES stated that he will "instruct the arrest of insurrected government officials". He gave the "insurrectionist[s]" a deadline of December 15, 2024, to step down.
- 3. Facebook is a service owned by Meta Platforms, Inc, which is accessible via website and mobile application. The servers utilized by Meta Platforms, Inc, in which user information and communications content are stored, are located in Menlo Park, California; users' communications and information travel across state lines to those servers. Facebook accommodates both interstate and

international commerce, as users are able to communicate with others in different states or countries. The post RANDLES made was public, so anyone with a Facebook account could read it, regardless of their location. Indeed, FBI Mobile was first notified of RANDLES' post, it was by Robert Scott, who lives in Missouri.



4. In a photo attached to that post, RANDLES posted photos of what appeared to be a manifesto, which was titled "Paul Revere Report." Within that report, RANDLES expressed grievances, declared government officials as "insurrectionists," discussed martial law, militias, and citizens arrests, and stated that RANDLES "will publicly assemble men and women to arrest the insurrectionist or suppress them with force".

Absence of Executive Branch

In the absence of an Executive Branch, if this document is ignored or more Government Officials refuse to carry out the Laws as written, the power lays with the people. Alexander Randles, in the absence of government correction, will suppress the insurrection to bring this district back into the United States control. Alexander Randles is a member of the unorganized militia group. Alexander Randles will publicly assemble men and women to arrest the insurrectionist or suppress them with force until the United States military assumes authority.

Insurrected Government Officials

PREV

The foregoing Government Officials have insurrected against the United States:

- **Baldwin County Prosecutor**
- Baldwin County Probate Judge Harry D'Oliver Jr.
- Foley Police Detective SGT. Robert Fennell
- Counsel, L.D. Owen III (Attorney for SGT. Robert Fennell)
- P. David Matheny (Appointed Lawyer to Randles)
- Mental Health Doctor (AltaPointe Health System Staff Member who attended the Probable cause hearing, Fraudulent Witness, Name Unknown to Randles)
- **Baldwin County Sheriff Department Custodial Agent**
- Foley Police Department Custodial Agent
- Call Center FBI Agent of Mobile, Alabama (Suspect 1 (10:15am 6/22/2022 FBI call center agent answered (Female)))
- Call Center FBI Agent of Mobile, Alabama (Suspect 2 (12:00pm 9/7/2022 FBI call center agent answered (Female)))

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- Call Center FBI Agent ID 9788 of Mobile, Alabama (Suspect 3 (12:30pm 9/7/2022 FBI call center agent answered (Female)))
- The United States District Court for the Southern District of Alabama Southern Division District Judge Kristi K. Dubose
- The United States District Court for the Southern District of Alabama Southern Division Clerk of
- The 11th Circuit Court Judge assigned to 24-12917, 24-12920, 24-12918
- The United States District Court for the Southern District of Alabama Southern Division District Judge Moorer
- The United States Attorney Sean P. Costello
- FBI Special Agent Paul Brown
- Stark County Prosecutor
- All other Government Officials and individuals that provide aid and support.

5. On January 30, 2024, RANDLES had attempted to perform a citizen's arrest on KOWAL at KOWAL's office, in which he was armed with a pistol and handcuffs, and possessed an AR-style rifle in the trunk of his vehicle. On February 02, 2024, RANDLES told FENNELL that he had the authority to perform a citizen's arrest on the doctor as well as anyone who "stood in his way" of performing that arrest. He also stated that if police tried to stop him, "they would be in violation of the law and he would meet them with whatever force needed to accomplish his task".

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- 7. RANDLES' actual attempt to place KOWAL under citizens, along with him actually stating that he intended to arrest KOWAL, and that he would meet law enforcement with "whatever force needed to accomplish his task," indicates that the "arrest" and "suppress with force" verbiage utilized in RANDALS' Facebook post do indicate that these threats are in reference to physically apprehending the listed individuals and holding them in custody.
- 8. As such, there is probable cause to believe that, by stating his intentions to arrest "Insurrected Government Officials," or "suppress them with force" on his Facebook account, indicating a date of December 15, 2024 for when he will conduct the arrests, and by listing said government officials by name and/or role, RANDLES is communicating interstate threats towards those government officials.

For all of the reasons stated herein, this Affiant respectfully submits that there is probable cause to believe that

ALEXANDER HILTON RANDLES,

violated 18 U.S.C. § 875(c). Accordingly, the Affiant respectfully requests that this Court issue a criminal complaint against Alexander Hilton Randles for this offense.

Dated December 12, 2024.

Elaine Kimiyo Brown

Special Agent

Federal Bureau of Investigation

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THE ABOVE AGENT HAD ATTESTED TO THIS AFFIDAVIT PURSUANT TO FED. R. CRIM. P. 4.1(b)(2)(A) THIS 13th **DAY OF DECEMBER 2024**

P. Bradley Murray Murray

Digitally signed by P. Bradley

Date: 2024.12.13 09:59:20 -06'00'

P. BRADLEY MURRAY UNITED STATES MAGISTRATE JUDGE