AFFIDAFIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Steven Kinsey, Special Agent of the Department of Justice, Federal Bureau of Investigation ("FBI"), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit, pursuant to Federal Rule of Criminal Procedure 4, in support of an application for a criminal complaint and accompanying arrest warrant for **Kayla Leaann Smith** ("**Smith**"). All dates, times, locations, and/or amounts listed in my affidavit are approximations.

2. I am a Special Agent with the FBI and have been so employed since July 2022. I am currently assigned to the White-Collar Unit within the Mobile Field Office. I have been in this position since December 2022. Prior to employment with the FBI, I worked as a police officer for the Biloxi, Mississippi Police Department for six years. My current duties include investigating violations of federal law, including both public corruption and complex financial crimes. I have received training on obtaining and reviewing electronic records, including bank records, and I routinely do so as part of my investigations. As an FBI Special Agent, I am authorized to investigate violations of federal law, and I am authorized to execute seizure warrants issued by federal courts.

3. The facts and information contained in this affidavit are based upon my personal knowledge, information obtained from other law enforcement officers, and information obtained from interviews and analyses of reports and data. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant and does not set forth all my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that a violation of 18 U.S.C. § 871 (Threats against the President) has been committed by **Smith**.

PROBABLE CAUSE

5. On October 1, 2026, an intelligence search of social media in anticipation of President Donald J. Trump's visit to Mobile, Alabama, on October 2, 2026, was conducted. A threatening statement was made by TikTok account username "charlierree," display name "Kayla Wayla," as discovered on the social media platform TikTok. On September 29, 2026, "Kayla Wayla" replied to a post. The original post stated "pov: when I overheard everybody at south alabama talking about trump coming to our homecoming." "Kayla Wayla" replied, "We only got one chance let's take it," and then posted an image of an individual mimicking holding a firearm. The post was made in a comment responding to a post about the President's intended visit to the University of South Alabama campus on October 2, 2026. *See* Figure 1 below.

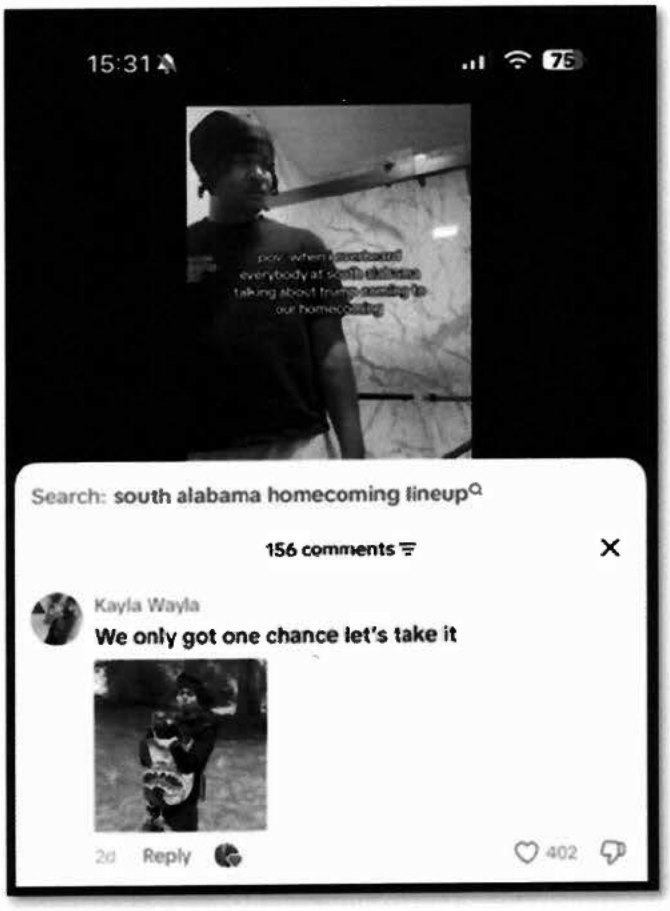

Fig. 1.

6. The TikTok profile page of "Kayla Wayla" references **Smith's** Instagram account "kayla.leaann." *See* Figure 2 below.

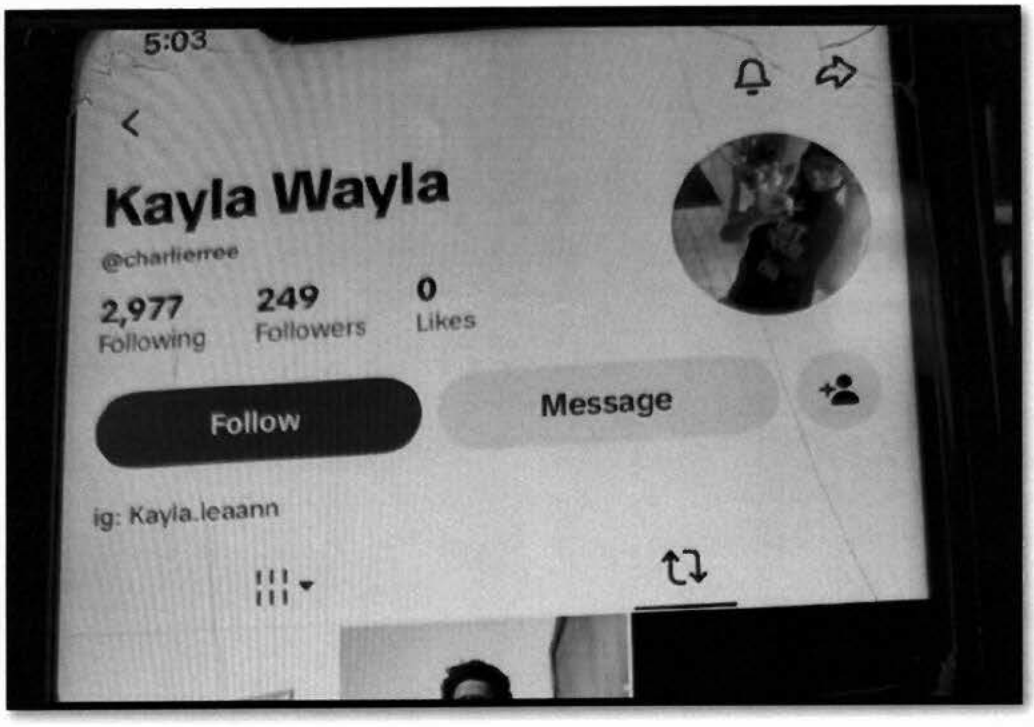

Fig. 2.

7. Social media research of "kayla.leaann" returned Instagram account display name "kayla.leaann." The profile contained no posts. The Instagram profile of "kayla.leann" had story highlights containing a photo of a document stating, "Kayla & Leah Smith." *See* Figure 3 below.

Fig. 3.

8. On September 30, 2026, an Emergency Disclosure Request ("EDR") was submitted to TikTok requesting information related to TikTok account username "charlierree." On September 30, 2026, TikTok responded to the EDR. According to TikTok, the phone number "+[redacted]5952" is listed on the account.

9. Database checks for **Smith** returned the following information: **Kayla Leaann Smith**, date of birth [redacted], social security number [redacted], a listed address at [redacted] Birmingham, Alabama 35215, Alabama driver's license number [redacted]7. Further checks found phone number [redacted]-5952, belonging to **Smith**, along with an address of [redacted], Birmingham, Alabama 35215. The phone number found through database checks for **Smith** matches the number on the TikTok account of "Kayla Wayla," *i.e.*, the account that made the post threatening the President identified above.

10. Open-Source research for "Kayla Leaann Smith" in "Birmingham" returned website nannylane.com, which had a nanny listing for "Kayla S." as a babysitter in Mobile, Alabama. "Kayla S." posted that she was pursuing a degree in Elementary Education at the University of South Alabama, where the President is scheduled to appear on October 2, 2026. *See* Figure 4 below.

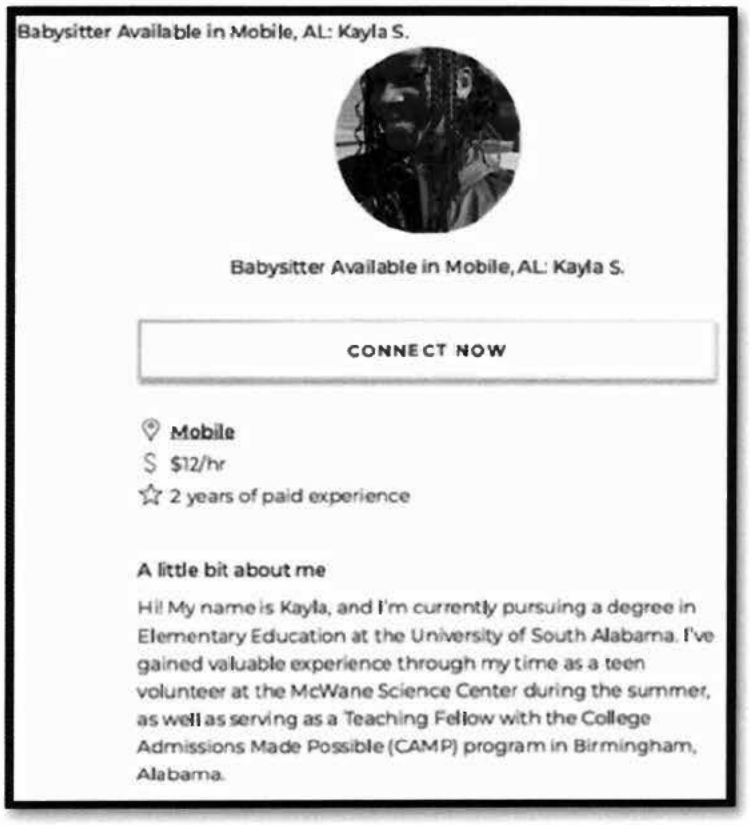

Fig. 4.

11. On October 1, 2026, Sergeant Richard Burns of the Investigations Division of University of South Alabama Police Department was contacted by FBI Mobile Division and provided the following information for **Smith**: date of birth [redacted], address of [redacted] Birmingham, local address of [redacted] Mobile, Alabama, current University of South Alabama Student, Elementary Education, phone number [redacted]-5952, 2017 Nissan Altima (AL [redacted]. Further, Sergeant Burns provided two police reports that list **Smith** as the suspect. Specifically, **Smith** is the "suspect" in two University of South Alabama police reports, case numbers U25040057, dated April 24, 2025, for a "Harassing Communications" offense, and U25040063, dated April 28, 2025, for a "Harassment" offense.

12. A review of all documents obtained show that TikTok Account username "charlierree," display name "Kayla Wayla," are **Smith**. Further, **Smith's** current address is the [redacted], Mobile, Alabama 36608, which is in close proximity to the University of South Alabama campus.

13. Based on the facts set forth in this affidavit, I believe that there is probable cause that **Smith** violated 18 U.S.C. § 871 (Threats against the President). Accordingly, I request that this Court issue a warrant for **Smith's** arrest.

CONCLUSION

14. Based on the foregoing, probable cause exists that a violation of 18 U.S.C. § 871 (Threats against the President) have been committed by **Kayla Leaann Smith**.

Respectfully submitted,

Steven Kinsey
Special Agent
Federal Bureau of Investigation

THE ABOVE AGENT HAS ATTESTED TO THIS AFFIDAVIT PURSUANT TO FED. R. CRIM. P. 4.1(b)(2)(B) THIS 1 DAY OF OCTOBER 2026.

KATHERINE P. NELSON
UNITED STATES MAGISTRATE JUDGE

SEALED