

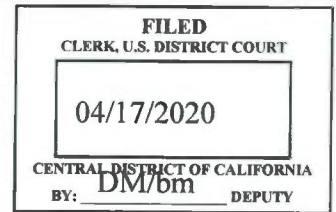
AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

Original Duplicate Original

UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

Carl Bennington,

Defendant(s)

Case No. 2:20-mj-01728

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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

Between at least February 13, 2016 and March 29, 2020, in the county of Los Angeles in the Central District of California, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2261A(2)

Cyberstalking

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

Marcus McCain, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: April 17, 2020

Judge's signature

City and state: Los Angeles, California

Jean P. Rosenbluth, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, MARCUS MCCAIN, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") in Los Angeles, California and have been so employed for approximately 3 years. I am currently assigned to a counter-terrorism squad, where I specialize in the investigations of international and domestic terrorist groups. I attended 21 weeks of New Agent Training at the FBI Academy in Quantico, Virginia. Prior to joining the FBI, I was a Special Agent for the Drug Enforcement Administration (DEA) for approximately 3 years working long term conspiracy narcotic trafficking investigations. Through my training and experience with the FBI and DEA, I have learned and used a variety of investigative techniques and resources, including surveillance, confidential sources, undercover operations, subpoenas, search warrants, evidence seizures, and telephone toll analysis. Through my training and experience in the FBI and the DEA, I am familiar with threats of violence, as I have investigated several cases and arrested several persons for making such threats.

II. PURPOSE OF THE AFFIDAVIT

2. This affidavit is submitted in support of a criminal complaint charging defendant Carl Bennington ("BENNINGTON") with Cyberstalking in violation of Title 18, United States Code, 2661A(2) (the "Subject Offense").

III. SUMMARY OF PROBABLE CAUSE

3. As detailed below, since at least 2016, BENNINGTON has used various social media accounts to send hundreds of repeated and unsolicited messages to multiple teenage girls threatening to commit acts of physical violence and sexual violence against them.

4. BENNINGTON is a 33-year-old resident of Covina, California, from where he sent the messages set forth below to victims in various states, including Texas and North Carolina.

IV. STATEMENT OF PROBABLE CAUSE

5. The facts set forth in this affidavit are based in part on: information provided to me by other law enforcement officers; law enforcement reports; information obtained from witnesses; my personal observations; and my experience, training, and background as federal law enforcement agent. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, with typographical errors in the original, and all dates and times are approximate.

A. Background on BENNINGTON and Incel Ideology

6. Between 2013 and 2019, in addition to the harassing and threatening posts BENNINGTON specifically directed at the victims identified below, BENNINGTON frequently posted

philosophical statements in Facebook groups promoting an ideology that is often referred to as Involuntary Celibacy or "Incel." Based on my training and experience, I know that those who adhere to "Incel" ideology, often referred to as "Incels," are individuals who want to have a willing sexual partner but are unable to find one despite trying for an extended period of time. Incels regularly congregate in various online forums and discuss how the "sexual marketplace" gives too much freedom to women to choose their partners, leaving some men without partners. Incel ideology ranges from sad and self-loathing to the "absolute hatred" of women. Incels have advocated for government-sponsored programs to redistribute sex among men, the legalization of rape, and violence, both sexual and physical, towards women.

7. Incels often use jargon and shared vocabulary to express their views. Incels use the terms "Alpha" and "Beta," as BENNINGTON has done in several of the messages cited below, to communicate the belief that a man must be "Alpha," meaning aggressive, intimidating, and dominating, to "take" the woman he desires. For example, on March 28, 2019, BENNINGTON posted in a Facebook group, "I get pissed when a hot bitch won't fuck me. So, I ignore her ass for committing a crime against humanity. It's like unforgiveable and straight diss of disrespect to an Alpha. So, Ill tell that bitch to get the fuck out of the way (its like you got one chance and you're done hoe). But also, I ignore ugly bitches as well, cause they are a crime against humanity as well too. Remember treat all women the same." On

September 1, 2019, BENNINGTON wrote, "Women's narcissism has been getting out of hand. They need to be put back in their fucking place. Fuck women." On October 4, 2019, BENNINGTON wrote, "Don't blame the Alpha Badboy when women cry when you try to fuck them . . . they are crying because it's rape to them."

8. Similarly, Incels frequently use the term "blue pill" to refer to men who are perceived to be uninformed, meaning here that they do not subscribe to Incel ideology, or material that prevents men from seeing the "reality" of the oppression of men by women in modern society. For example, on March 16, 2016, BENNINGTON wrote on Facebook, "I would assume blue pill is positive reinforcement which women use to enslave mankind." Incels also use the term "red pill" to refer to men who are informed, meaning here that they do subscribe to Incel ideology, or material that can be used to convince men to subscribe to the ideology. For example, in another Facebook post, BENNINGTON wrote, "Red pill 101. Women aren't nurturers of humanity. They love violence and being dominated. DUH." On October 29, 2019, BENNINGTON posted on Facebook a screenshot of a page from the "Red Pill Handbook" describing how the "feminine imperative" is "crushing the spirit of young boys," and posted, "Fuck the feminine imperative. On with the Masculine Imperative . . . stop trying to turn boys into girls."

9. Incels have committed several mass-casualty attacks and acts of violence against women in recent years. The Incel community gained attention following the 2014 attack at a University of California-Santa Barbara sorority and the

surrounding community by Elliot Rodger ("Rodger") that killed six people and injured fourteen others. Rodger, who self-identified as an Incel, wrote in his manifesto prior to his 2014 attack, "I burned with hatred towards all women for rejecting me throughout the years." Rodger is considered a hero by some in the Incel community, who adopt his name and image in their online forums. In addition to Incel jargon mentioned below, Incels who emulate Rodger often use his initials and refer to conducting mass-casualty attacks and murder as "going ER." Among those who idolized Rodger, according to open source news articles, was Nikolas Cruz, who carried out the mass shooting on Valentine's Day 2018 at Marjory Stoneman Douglas High School in Parkland, Florida, killing 17 people and injuring 17 others.

10. BENNINGTON posted several Facebook messages about Rodger between 2015 and 2019. BENNINGTON wrote that he had read Rodger's manifesto and expressed sympathy for Rodger, stating "Elliot Rodgers was a victim." On another occasion, BENNINGTON wrote that he had gotten kicked out of a Facebook group for "pretending to be Elliot Rodgers on there." On other occasions, BENNINGTON wrote that Rodger was driven to mass murder because he was a "blue pill beta" with "low emotional intelligence" who "thought money and status gets you laid" and failed to "do the work and fix himself" into an "alpha" male.

11. In July and September 2019, law enforcement records show that BENNINGTON was placed on 72-hour mental health holds by officers of the Covina Police Department under California Welfare and Institutions Code 5150. In both instances,

BENNINGTON's family members called the police and reported that BENNINGTON was threatening to injure or kill them and acting irrational. The family members also reported that BENNINGTON has "paranoia" and had stopped taking medication.

Notwithstanding BENNINGTON's possible mental health condition, the messages set forth below, in which BENNINGTON threatens various forms of physical and sexual violence against young girls and women, demonstrate BENNINGTON's intent, consistent with his Incel ideology, to harass and intimidate the victims for refusing to submit to his sexual advances.

B. March 2019 to Present: BENNINGTON Sent Threatening and Harassing Messages to Victim 1

12. On November 1, 2019, FBI agents interviewed a woman ("Victim 1") in Texas regarding threatening and harassing messages BENNINGTON had sent her over the past several years from various social media accounts. According to Victim 1, she lived in Texas throughout the period when BENNINGTON sent the threatening and harassing messages to her, and she received most of those messages in Texas. Records provided by Facebook confirm that Victim 1 accessed her Facebook account throughout 2019 from internet protocol ("IP") addresses in Texas.

13. According to Victim 1, BENNINGTON first contacted her through the My Fitness Pal application in 2013, when she was approximately 14 or 15 years old. According to Victim 1, BENNINGTON claimed to be 18 years old at that time and engaged,

at first, in a general conversation with Victim 1.¹ According to Victim 1, after a while she began to find BENNINGTON's messages strange and she stopped responding to him. BENNINGTON continued to send her messages until she blocked BENNINGTON's account on the My Fitness Pal application. According to Victim 1, after that time, BENNINGTON began sending her repeated and unsolicited messages on Facebook, Instagram, Snapchat, and Twitter in which he threatened to commit acts of sexual and physical violence against her. In many of the messages, BENNINGTON stated that he was in love with Victim 1 or implied that he and Victim 1 had a romantic relationship, however, Victim 1 never met BENNINGTON or exchanged any romantic communications with BENNINGTON.

14. Victim 1 provided agents several of the messages that she saved that BENNINGTON sent her. On February 21, 2020, United States Magistrate Judge Alka Sagar issued search warrants in Case Numbers 20-MJ-825, 20-MJ-826, 20-MJ-827, and 20-MJ-828, for Facebook, Instagram, Snapchat, and Twitter accounts belonging to BENNINGTON and Victim 1. Records provided in response to those warrants verified that BENNINGTON was the subscriber and user of the accounts sending the harassing and threatening messages to Victim 1. For example, the user names or display names for the Facebook, Instagram, Snapchat, and Twitter accounts were either "Carl Bennington" or "carl.bennington." The profile picture for the Facebook and

¹ In fact, according to California Department of Motor Vehicles ("DMV") records, BENNINGTON was 26 or 27 years old in 2013.

Instagram accounts matches the California DMV photograph of BENNINGTON. The phone number associated with the Facebook and Instagram accounts, XXX-XXX-3347, is subscribed to BENNINGTON's sister, with whom BENNINGTON lived until February 2020. The email address associated with the Snapchat and Twitter accounts was carlbennington2019@outlook.com.

15. Records provided by Facebook included many of the messages provided by Victim 1, as well as additional threatening and harassing messages that BENNINGTON sent to Victim 1 and other victims, and similar messages that BENNINGTON posted publicly during periods when Victim 1 had blocked his account from sending her direct messages. Facebook records also showed multiple accounts that appear to have belonged to BENNINGTON in the past that Victim 1 blocked. The messages identified below were obtained from the most recent Facebook profile that BENNINGTON has used to message Victim 1 since March 2019.

16. On March 1, 2019, Victim 1 wrote a Facebook message to BENNINGTON stating, "Who actually are you." BENNINGTON responded, "I'm greatness. You already know who I am." Victim 1 responded, "No I don't. What's your actual name." BENNINGTON responded, "Don't Fuckin test me [Victim 1]." Victim 1 responded "? You've had one photo for years. I've had people stalk me, it's a fair question." BENNINGTON responded, "My life doesn't revolve around you. And I don't care. Anyways you came at with such disrespect and ignorance. It makes me so fucking angry. I can't even breathe right now. You are blocked."

17. On March 11, 2019, BENNINGTON sent a Facebook message to Victim 1 stating, "I unblocked you. but understand talking to me that way is a no no." Victim 1 did not respond.

18. On June 24, 2019, Victim 1 wrote to a person, A.D., whom she found on Facebook and who knew BENNINGTON in high school. Victim 1 wrote to A.D. that BENNINGTON had been "harassing me on all forms of social media making dozens of accounts attacking me and I don't respond and keep blocking him but he's nuts." Victim 1 wrote to A.D. that BENNINGTON had messaged her randomly when she was 14 years old, "its been going on for 8 years," and "[I don't know] how to get him to stop." Victim 1 wrote, "some from today," and sent A.D. screenshots of messages BENNINGTON wrote her in which he stated, for example: (1) "@[Victim 1] I'll take care of you . . . as long as you have my back . . . don't disappoint me . . . or you'll be banished FOREVER bc I'm the one true KING!!!"; (2) "@[Victim 1] remember to get fucked too get fucked tossed . . . and committed not by me but by you then thrown in the dumpster"; (3) "@[Victim 1] I either need to fuck you relentlessly or somebody else . . . I can't stop my narcissistic psychopathy . . . it demands to fuck someone hard . . . I'm not sorry."; (3) "@[Victim 1] you're not bringing anything to the table . . . why should I pick you . . . if I get younger and tighter . . . I'm a realist and I'll act on it too . . . Cause you have nothing . . . I think you might be too old for me now . . . my value will continue to climb while yours is DECAYING after 22."

19. On July 13, 2019, Victim 1 exchanged messages with a person named A.S. who went to high school with BENNINGTON and had seen BENNINGTON posting about Victim 1 on Twitter. Victim 1 wrote that BENNINGTON had "been stalking me for 8 years" and that she would "block him on everything but he makes new accounts all the time." Victim 1 asked, "do you think he's dangerous?" A.S. responded, "Honestly, he's like obsessed with you he literally tweets you EVERY SINGLE DAY. So I would say yes." A.S. then sent Victim 1 screenshots of Twitter posts BENNINGTON made in which he tagged Victim 1, for example:

(1) "Actually I'm not gonna play. @[Victim1]. You broke the rules . . . I'll only give you till 9pm . . . I'm not doing 12 [@Victim 1]. You know I mean that . . . I'll work a 9-5 for a couple of weeks to get rid of you."; (2) "@[Victim 1], Got three girls to work on. And you women are making me chase after you. I got time for that shit. That's too much work. Cause she's in love with my dick."; and (3) "@[Victim1] As I said if you don't budge you have to let go."

20. On July 14, 2019, A.S. sent Victim 1 a screenshot of a message she sent to BENNINGTON stating, "You know she has you blocked? She can't see any of these tweets you send her everyday." BENNINGTON responded by tagging A.S. and Victim 1 and stating, "YOUR ASS NEVER RESPONDED. She responds." BENNINGTON then wrote, "[A.S.] welcome to the Alpha widow club." A.S. responded, "You are seriously so weird leave that poor girl alone Carl." BENNINGTON responded, "@[Victim 1] @[A.S.] can at least do some choking tonight And off to Vegas and get married."

Like goddam. I know ladies, I'm GOD!! Now, come to papa . . . for he is the rebellious these days . . . A rebel who wants to get laid!!! You need to serve the lord on Sunday by taking off those clothes. Sunday is break day."

21. Also on July, 14, 2019, BENNINGTON posted a public Facebook message stating, "[Victim 1] are you trying to make me into my father . . . are you fucking kidding me!!" An hour later, BENNINGTON posted another public message stating, "[Victim 1] is playing hide and seek from me. Can someone have her come in front of me and reject me in my face. I take rejection pretty well . . . I don't want no MESSENGER BETA SERVANT to do it for her. TELL HER TO DO IT HERSELF!!! GOD IS TIRED. ITS HIS REST DAY Come forth DEVINL [Victim 1]." Later that day, BENNINGTON posted another public message stating, "[Victim 1] is my one . . . I can't live without here . . . we are going to build a big house together with pink fences and a dog named Shilo."

22. On July 15, 2019, A.S. sent Victim 1 screenshots of more tweets from BENNINGTON directed at Victim 1 that appear to be from a new account created by BENNINGTON. The tweets from BENNINGTON stated, "@[Victim1] I'm gonna vet your ass in front of everyone . . . Cause I already know I bail my self out . . . This is your test. Damn I ran out of gas going uphill. Got rid of my gas tank . . . Let see if you have my back then you get in front of my dick. I'm married to myself you can't have it . . . Let's see if you are going to reward me . . . eh hh nope @[Victim1] you're fucking lying to everyone . . . I had

EVERYTHING!!!! Yet still I didn't get anything even when I HAVE nothing. Your full of shit!!!! I'm Not playing anymore . . . don't come to me on your PERIOD!!" BENNINGTON then posted a picture of a bank account with a negative balance and stated, "@[Victim1] I still haven't had any pussy."

23. On July 16, 2019, Victim 1 shared with A.S. a screenshot of a Twitter message she posted in response to BENNINGTON's posts in which Victim 1 wrote, "@CarlBennington This is your notification to cease and desist all contact with me, forever, or I will contact the police." BENNINGTON responded to that message with a picture of a black trash bag and the text, "@[Victim1] in the trash you go."

24. On July 16, 2019, Victim 1 also exchanged several Facebook messages with BENNINGTON asking him to stop harassing her.

a. Victim 1 wrote a Facebook message to BENNINGTON stating, "Carl. This is the last time I am going to ask you to cease and desist all communication with me forever. I do not know you and I do not want to know you. You need some serious mental help. Please leave me alone and stop all the harassment!"

b. Later that day, BENNINGTON responded to Victim 1, "You and I are never gonna happen. Get over it. I love someone else."

c. Victim 1 replied, "I'm glad. I do not want you and I to happen, you are delusional for thinking it ever would. Now please stop contacting me. and stop tweeting at me and

making statuses about me and random accounts. it's crazy and is harassment and needs to stop."

d. BENNINGTON replied, "Your friends and family are gonna be murdered if you stop. Only you can prevent it. Do you want everyone you love in your murder and killed. You need to show yourself if you. You won't be safe either. You don't have a choice. Show yourself or everyone and you will be gone from this earth. You need to save them. Some is gonna show up to your place right now . . . it's not gonna be. You have to what they say. [VICTIM 1]!!!!!! GOOO!!!! GET YOURE WHORE ASOVER HERE NOW. HURRY. Or you're going to get killed. It's not safe. I'll kill everyone you love if you don't come. And leave you in the dust. Is that how your gonna treat your boyfriend. Fucking kill you if you don't come out here and Strangle your ass If you don't do it. Fine just wait . . . I'm gonna get rid of this car and phone . . . soo I be off the radar . . . watch yourself payback is a bitch . . . if I decide to do it. I don't have anything left [Victim 1]. You took away my job. I'm neg in my account. I'm getting into fights bc of you and my engine . . . I hate you. All you give a fuck is about yourself. How would you even if a good wife if you can even have your mans back."

e. Victim 1 responded, "I am not your wife, nor your girlfriend and I never have been and never will be. YOU are the one harassing me I have done nothing."

f. BENNINGTON responded, "16 people saw you give me your phone number. I have done nothing."

g. Victim 1 responded, "I'm pressing charges. Stop."

h. BENNINGTON responded, "No Fucks given ducky . . . go back to Texas while your at it too. Or where your from. Get down you need to suck my dick while you're at it. Maybe you swollen that protein while you're at it Fat ass. You fucking little slut. Go back to your fucking beta boyfriend and leave me alone. GI just go this new shiny ring. Go away. Not hiring." Victim 1 did not respond.

25. On August 4, 2019, BENNINGTON sent Victim 1 several extremely offensive and lewd Facebook messages including, for example, "@[Victim 1] I want you to scream and Slap the fuck outta you and call me your fucking daddy. I want to be unable to walk. I want you sore, bloody and bruised." BENNINGTON then posted messages to Victim 1 and another person who was a high school friend of Victim 1 and wrote, "I picked you and [Victim 1] 6 years ago."

26. On August 22, 2019, BENNINGTON sent Victim 1 several harassing and threatening Facebook messages, to which Victim 1 did not respond.

a. At 5:41 P.M., BENNINGTON sent Victim 1 a picture of the movie A Dogs Journey, and stated, "I was wondering you like to be in my movie a dogs journey. She seeks fucking attention all day. She's also looking for her master." BENNINGTON then sent Victim 1 a picture of a dog collar, and stated, "Are you good with fetch. Speak dog . . . speak." BENNINGTON then sent Victim 1 another picture of a man giving

dogs commands, and stated, "You and Courtney can go fetch that fuckin ball. My gonna start picking children names. Nah. I'm just kidding . . . I'm too fucking lazy. You go figure out the fucking names you little slut. Love u. Fuck love."²

b. Later that night, BENNINGTON wrote to Victim 1, "Can we bang already. Cunt." BENNINGTON then sent a picture of a man riding a horse with a rope, and stated, "Get the fuck over here you little slut. I need to go back to work. I have to take care of myself. What is that you need from me . . . I have too go back to work . . . you can try to stop me . . . I don't fucking care . . . You can come with me . . . I need to win again. Leave me alone . . . I need to fucking win . . . this is business how. Hoe*. I won't leave u . . . I'm not making promises though. I guess you know the Alpha never leaves lol trick hoes. I never said I was gonna leave though. That winning strive in me never leaves. That's what makes me king. I need to move out . . . I can sense my mom, sister, and roommates mom wants to bang me. It's fucking gross [Victim 1]."

c. Later that night, BENNINGTON wrote to Victim 1, "I remember when I reported your ass for stealing my car and all the men and women were like 'I wanna hear the love story' and I was like 'fuck that, there ain't no love story. Arrest her ass.'"³ BENNINGTON then sent a picture to Victim 1 of a woman

² Through analysis of Facebook records belonging to BENNINGTON, "Courtney" appears to be another victim often targeted in BENNINGTON's public posts.

³ FBI agents reviewed law enforcement and DMV records and identified no records indicating that BENNINGTON has ever owned

placed in a garbage can with her legs sticking out of it, and wrote, "You just got dumped hoe. Beatings are for fun . . . break ups are for being bad news . . . It looks college was fun for you . . . while I had it the toughest . . . why should I even fucking help. I'm more constrained from achieving . . . which is fucking bullshit. You don't deserve me . . . go a different direction . . . I don't even wanna be with you even trying to sell it to me . . . Get the fuck outta here . . . I'm not playing. It's rude and fucking disrespectful to the king of Alphas. Cause you can't buy him. It makes you look like a slut . . . slut . . . Do you sell your body to fuckjng everyone to get your way . . . Probably do."

27. The next day, August 23, 2019, BENNINGTON sent Victim 1 several more harassing and threatening Facebook messages, to which Victim 1 did not respond.

a. At 10:20 A.M., BENNINGTON sent Victim 1 a picture of a dog serving a glass of champagne, and stated, "Yes, thank you dog. Now go fetch me more water. I sense you close by you little how. Hoe*. I was already making you spin when you were in high school. And once you graduated . . . fuck I need to get to that guy. At the same time I was capitalizing on SMV. You're treating me like a friend . . . and I'm getting fuckin tired of it. Share up or sit out . . . fucking hoe. Do you want ot be exclusive . . . Ehhh I changed my mind. I own you."

a vehicle, or has ever filed a police report regarding a stolen vehicle.

b. Later that day, BENNINGTON sent Victim 1 a message stating, "Get your little slutty ass over here. Or go away. Dog. Where the fuck is your collar at . . . I need to go buy a leash so you don't escape!!! Fucking hoe. I wanna pound you doggy and pull your fucking hair. Then Im gonna burry Your body into a grabe. And no one is come to look for you. You Better obey you a slut. No one wants you around. I own you. Fuck you . . . no. I'm gonna rape you, and you better fucking tell anyone."

c. BENNINGTON then sent Victim 1 the photograph shown below, of a man choking a woman while pointing a gun at her, and stated, "I'll be fucking watching you. I owe you."



d. BENNINGTON then sent a picture of a leather dominatrix whip being pressed against the back of a woman, and wrote, "Shut the fuck up and don't talk. Where the fuck is your collar. We are not gonna have a baby . . . I need you around for a while. I want you fucking sore all over body. I wanna slap you around. You belong to no one else but me."

28. The next day, August 24, 2019, BENNINGTON sent Victim 1 additional threatening and harassing Facebook messages, to which Victim 1 did not respond.

a. BENNINGTON sent Victim 1 a Facebook message containing the picture shown below, of a man in a black hooded sweatshirt restraining a woman from behind by the neck, and wrote, "You're mines forever you little slut. You're going no where. You ain't leaving the kids. My ass is going back to fucking work . . . I can't deal with all your dumbasses anymore."



shutterstock.com • 459511585

b. BENNINGTON then sent a photograph of Victim 1 with her friends from several years earlier, and wrote, "Look how young you were. When I first started talking to you. Still ugly as fuck. And her boyfriends were even uglier . . . the fuck . . . Why the fuck are you soo possessive . . . my ass ain't possessive. Can I have my other car key back too while your at it."

c. BENNINGTON then sent Victim 1 the photograph shown below, of a woman being choked while lying down, and stated, "Fucking liar."



29. On November 26, 2019, BENNINGTON sent a message to Victim 1 stating, "Let's work things out [Victim 1] . . . call or text me [XXX-XXX]-5691. Come on girl. I know you miss me. Marry me . . . For real though . . . I just wanna let you know. I want to apologize for some of things I said in the past. I never meant to hurt you or anybody else . . . but you were hurting me soo bad. That I didn't deserve anything I was being put through. Plz take ownership as well."⁴ Victim 1 did not respond.

⁴ Based on my search of law enforcement databases, the phone number listed in that message is subscribed to the address at which BENNINGTON lives with his sister.

30. Victim 1 also provided agents screenshots of messages that BENNINGTON sent her on Snapchat. The screenshots do not contain dates and times.⁵

a. In one screenshot, BENNINGTON wrote, "remember your exclusive with me and I fucking own you. . . ." Along with that message, BENNINGTON sent the below photograph, showing a man, whose face was scribbled out with a black sharpie, holding a gun to the head of a woman while forcefully covering her mouth with his hand.



b. On another occasion, BENNINGTON sent Victim 1 a direct message containing a photograph of a silhouette of a man and a woman, where it appears as though the man is about to or

⁵ Records provided by Snapchat for BENNINGTON's account did not include any messages sent by BENNINGTON to Victim 1 or any other person. Based on my training and experience and knowledge of this investigation, I believe this is because after victims blocked BENNINGTON from messaging them from the Snapchat account, he deleted the account and created a new account, and Snapchat did not preserve the messages sent from the deleted account.

just has, slapped the woman. The message associated with the picture stated, "I told you to shut up. . . ."

c. On another occasion, BENNINGTON sent Victim 1 a direct message containing a photograph of a dirty white shirt with a message stating, "wash my clothes bitch. . . I'm gonna fuck ur friends too."

31. Victim 1 also provided screenshots of messages that BENNINGTON sent her on Twitter. The screenshots do not contain dates and times.⁶ In the screenshots of Twitter messages provided by Victim 1, BENNINGTON wrote a direct message to Victim 1 stating, "Fatass; Booger; Eat shit bitch; I'm gonna fuckin choke you; Love u." On another occasion, BENNINGTON sent Victim 1 a direct message stating, "you know when school starts. . . It's goin to be losing battle for you. . . I'm just being honest. . . my game has improved. . . It will end up losing. . . you got scared of the last time I went direct. . . I'm going direct again. . . if I were you. . . I'd be scared."

32. According to Victim 1, after she saw BENNINGTON post a public message containing disparaging comments about her and another woman ("Victim 2"), she contacted Victim 2, whom she did not previously know. According to Victim 1, she and Victim 2 discussed their common experience receiving unsolicited

⁶ Records provided by Twitter for BENNINGTON's account did not include any messages sent by BENNINGTON to Victim 1 or any other person. Based on my training and experience and knowledge of this investigation, I believe this is because after victims blocked BENNINGTON from messaging them from the Twitter account, he deleted the account and created a new account, and Twitter did not preserve the messages sent from the deleted account.

harassing and threatening messages from BENNINGTON, and both decided to block BENNINGTON's social media account to try to prevent him from continuing to send such messages.

C. February 2016 to Present: BENNINGTON Sent Threatening and Harassing Messages from to Victim 2

33. On November 13, 2019, I and another FBI agent interviewed Victim 2 in North Carolina regarding threatening and harassing messages BENNINGTON sent her on Facebook and Instagram. According to Victim 2, she resided in North Carolina throughout the period when BENNINGTON sent the threatening and harassing messages to her, and she received most of those messages in North Carolina.

34. Victim 2 stated that BENNINGTON began sending her messages on Facebook in 2016, and at first they exchanged a few messages on the topic of mental illness. According to Victim 2, in 2016, BENNINGTON began sending her unsolicited sexual messages and, as a result, she blocked BENNINGTON from her profile. In late 2017, Victim 2 said, she stopped using all social media for approximately 14 months.

35. In spring 2019, according to Victim 2, she again started using social media. In the summer and fall of 2019, BENNINGTON began sending Victim 2 hundreds of increasingly violent and threatening messages on Facebook and Instagram. In many of the messages, BENNINGTON stated that he was in love with Victim 2 or implied that he and Victim 2 had a romantic relationship, however, like Victim 1, Victim 2 stated she never met BENNINGTON and never engaged in any romantic communications

with BENNINGTON. When BENNINGTON sent Victim 2 sexually explicit, harassing, and threatening messages, Victim 2 often did not respond to the messages. Victim 2 also blocked BENNINGTON's accounts on multiple occasions. According to records provided by Facebook, from February 2016 to the present, BENNINGTON actively searched for Victim 2 approximately 358 times.

36. Victim 2 provided FBI agents copies of several of the messages BENNINGTON sent her. The Facebook messages were from the same Facebook account discussed above, which BENNINGTON used to send messages to Victim 1. Records provided by Facebook included many of the messages provided by Victim 2, as well as additional threatening and harassing messages that BENNINGTON sent to Victim 2.

37. In 2016 and 2017, BENNINGTON sent Victim 2 several unsolicited sexual messages, to which Victim 2 did not reply.

a. For example, on February 13, 2016, BENNINGTON posted a public Facebook message directed at Victim 2, stating "[Victim 2] don't ever take me serious doll. I'm very sarcastic. And don't forget to get your vibrator a Valentines Day Card."

b. On April 30, 2016, BENNINGTON posted a public Facebook message directed at Victim 2, stating, "[Victim 2] show your ass."

c. On May 1, 2016, posted a public Facebook message directed at Victim 2, stating, "you better be wearing that sexy dress. When I come pick you up tonight @[Victim 2]."

d. On June 24, 2016, BENNINGTON posted a public Facebook message directed at Victim 2, stating, "Yeah, @[Victim 2] is trying to trap an ENTP⁷ to marry her. She's on the hunt."

e. On September 14, 2016, BENNINGTON posted a public Facebook message directed at Victim 2, stating, "[Victim 2], I found you a nice guy."

f. On December 25, 2016, BENNINGTON posted a public Facebook message directed at Victim 2, stating, "[Victim 2] is on my naughty list."

g. On April 11, 2017, BENNINGTON posted a public Facebook message directed at Victim 2, stating, "[Victim 2], I have your hotdog for you."

h. On May 6, 2017, BENNINGTON posted a public Facebook message directed at Victim 2, stating, "[Victim 2], you're like my little sister that I like to tease, but who I love and adore at the same time."

i. On August 30, 2017, BENNINGTON posted a public Facebook message directed at Victim 2, stating, "[Victim 2] come sit on papa's lap."

38. As noted above, in late 2017, Victim 2 stopped using all social media for approximately 14 months. In August 2019, shortly after Victim 2 reactivated her Facebook account,

⁷ Based on my training and experience, I know that "ENTP" is an acronym for one of the personality types documented using the popular "Myers Briggs" personality designations, and stands for "Extraverted, Intuitive, Thinking, Perceiving." Based on my training and experience, I know that Incels frequently refer to the Myers Briggs personality types in referring to themselves and attempting to categorize themselves and others as "Alpha" and "Beta" males.

BENNINGTON began sending Victim 2 increasingly aggressive and threatening messages, to which Victim 2 did not respond.

a. On August 25, 2019, BENNINGTON sent a Facebook message to Victim 2, stating, "Cause I said so. I wanna pin you against the wall and kiss and bite your neck then pull your hair and pound doggy until your fucking sore." BENNINGTON then sent Victim 2 a picture of a young girl standing in the corner of a room, as though being punished, and stated, "This is what you get for leaving me fatass. Think about what you've done for a while." BENNINGTON then sent a picture of a man choking a woman while pointing a gun at the woman, and stated, "Your ass better not fuckjng leave . . . if you know what's good for you . . . This dick bitch!!!!" BENNINGTON then sent a photograph of a baby bouncer fashioned as the Batmobile and stated, "We will name our child Gotham soo [Victim 2] is like Gotham needs you Batman then I'll ride on my car . . . Slut. Dog . . . can you bark for me dog."

b. Later that morning, BENNINGTON sent Victim 2 a photograph of a dirty white t-shirt and stated, "Go wash my clothes you ugly little slut. I'm making you with me . . . you have no choice."

c. Later that morning, BENNINGTON wrote to Victim 2, "Fine. . . you get body chopped up and dumped you little hoe," accompanied by the below photograph, showing a body in a trash can in the woods with its leg slashed open.



d. BENNINGTON then sent a picture from the movie "50 Shades Of Gray" and stated, "50 shades darker now . . . Marry me. Fuck I hate being in love, slut . . . You better decide what your fucking gonna do. Your biological clock is about to wear out." BENNINGTON then sent a photograph of a clock approaching midnight and stated, "At the 'stroke' of midnight."

e. Later that morning, BENNINGTON made a public Facebook post directed towards Victim 2, stating, "I was thinking about marry this stripper named [Victim 2]. What do you have to offer me slut." Less than an hour later, BENNINGTON sent a direct message to Victim 2 stating, "Fuck . . . I don't know why I have so much love for this girl . . . you rock my dick on!!! Fuck . . . you make me honry and want my kids . . . When do I get a free sample. You better not being cheating on me you little slut . . . I own you."

f. Later that morning, BENNINGTON sent Victim 2 messages stating, "I'm outside your window watching you. . . you better be on the look out. . . if you know what good for you. . . only god can save you. . . slut. . . dog. . . whore. . . Bark for me you little slut."

g. Moments later, BENNINGTON sent Victim 2 additional messages stating, "Don't make me slap you around. . . if you know what's good for you. . . no one is gonna hear you cry when I'm fuckjng [sic] done with you. . . your [sic] my victim. . . you little whore." BENNINGTON then sent the below photograph, showing a man holding a knife to a woman's throat, accompanied by the messages, "I know where you live. . . Don't scream. . . or I'll cut your Adam's apple. . . You're not really a dude are you."



h. At 9:44 A.M., BENNINGTON sent Victim 2 a picture of a baby's crib and the message, "Your gonna have my baby." BENNINGTON then posted another picture of a man in a ski-mask

holding a knife to a woman's throat, and stated, "You abort it . . . I'll kill you . . . don't fucking move."



i. At 9:48 A.M., BENNINGTON sent Victim 2 a picture of a woman's hands tied or restrained and the message, "Don't fucking squirm . . . or you'll get slapped around. I own you now. . . and your gonna as I say. Cause I'm FUCKING GOD."

j. At 10:09 A.M., BENNINGTON sent Victim 2 a message stating, "Your not fucking going anywhere . . . you're cuming with me. You little sluuu." BENNINGTON then posted a picture of a silhouette of a cowboy with a rope, and stated, "Your ass ain't running away again . . . you little bitch . . . I'm very possessive of my property . . . I AM YOUR ONE. NOBODY ELSE!!" BENNINGTON then posted a photograph of a man in a ski-mask holding a knife to a woman's throat, and stated, "You got that!!!!!! You little whore."

k. At 11:54 A.M., BENNINGTON sent Victim 2 a message stating, "I know you're in love with me . . . You and I forever." BENNINGTON then posted a picture of a woman's hands

tied together with red rope, followed by another picture of a man pointing a gun at someone's face, and stated, "You better no fucking cheat on me . . . I blow them out of the water . . . cause THE SHIT!"

1. At 12:34 PM, BENNINGTON sent Victim 2 a picture of a woman with a knife held to her throat, and the message, "You're mine forever."

m. At 12:37 PM, BENNINGTON sent Victim 2 a picture of a man choking a woman while pointing a gun at her, and the message, "You got that . . . you little fuckin hooker . . . now give me some free vagina. Your gonna marry my ass. You don't have a fucking choice. Slut . . . I'm leaving you."

39. The next day, August 26, 2019, BENNINGTON sent Victim 2 several more harassing and threatening messages, to which Victim 2 did not respond.

a. At 6:45 A.M., BENNINGTON sent Victim 2 a message stating, "Come to California. I've fallin and I can't let you go . . . I'm selfish as fuck. Let's start a family . . . I've already told everyone youre taken by me . . . I know you feel the same. This unplugging left me as a horn dog all day . . . wtf. You were all just jealous my career . . . fuck."

b. At 7:57 A.M., BENNINGTON sent Victim 2 a message stating, "You wanna go out for a drink girl . . . You might get very sleepy. You better not fucking reject." BENNINGTON then sent Victim 2 a photograph of a prescription bottle of Risperidone, and stated, "Or you'll be getting this in your drink."

c. At 9:20 AM, BENNINGTON sent Victim 2 a picture of a woman on her hands and knees with a chain and leash around her neck, and stated, "Bark for me you little slut."

d. At 10:01 AM, BENNINGTON sent Victim 2 a picture of a woman in lingerie, lying in a chair, while being held by the neck, and states, "My love. Better not be fucking cheating on me."

e. At 5:51 P.M., BENNINGTON sent Victim 2 a picture of a man holding a gun to someone's face, and stated, "Your ass better not be fucking anyone but me. I own you. Your exclusive with me, but I'm not exclusive with anyone . . . you got that!!!! You little slut . . . Fuck . . . I'm not good with this shit . . . I'm the master of all functions now . . . crazy shit . . . I love being perfect." BENNINGTON then sent Victim 2 a picture of a silver wedding ring, and stated, "I'm #1 and you get silver cause your dumbass is 2 . . . your ass can't complain either . . . Come to California . . . or I'll replace your ass!!!!"

f. At 8:16 P.M., BENNINGTON sent a message with a picture of notorious serial killer Ted Bundy and the text, "Hi I'm ted bundy . . . do you remember me at the park . . . I thought soo. You look familiar. I think tied you up in the back of a tree. Shhh don't scream . . . If you wanna live. No ones ever lived though. . . ."

40. According to records provided by Instagram, on September 21, 2019 at 6:28 P.M., BENNINGTON sent Victim 2 a direct message on Instagram stating, "dead over alive your

coming with me -robocop. . . are you really crying." Victim 2 did not respond.

41. On March 30, 2020, Victim 2 sent agents an Instagram message she received from BENNINGTON on March 29, 2020, from a newly identified Instagram account. In the message, BENNINGTON commented on Victim 2's Instagram profile picture, "I liked [Victim 2] before she went nuts." Victim 2 did not respond.

42. Records provided by Facebook also show that BENNINGTON sent most if not all of the messages set forth above from within the Central District of California. Specifically, BENNINGTON has resided in the Central District of California continuously since at least 2016, and the Facebook account from which BENNINGTON sent many of the threatening and harassing messages discussed above was accessed on numerous occasions between 2017 and 2019 from Internet Protocol ("IP") Addresses belonging to AT&T Wireless. Records provided by AT&T Wireless show that the cellular tower associated with those IP addresses is in the Central District of California, and specifically, is the closest
//
//

AT&T cellular tower that exists to BENNINGTON's current and former apartments in Covina, California.

V. CONCLUSION

43. For the reasons described above, I respectfully submit there is probable cause to issue the requested criminal complaint and arrest warrant.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 17th day of April, 2020.



UNITED STATES MAGISTRATE JUDGE
JEAN P. ROSENBLTH