

UNITED STATES DISTRICT COURT
for the
District of Colorado

United States of America

v.

Teak Ty Brockbank

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)

Case No. 24-mj-00143-KAS

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 9/22/2021 - 8/4/2022 in the county of Denver in the
District of Colorado, the defendant(s) violated:

Code Section 18 U.S.C. § 875(c)
Offense Description Threats in Interstate Commerce

This criminal complaint is based on these facts:

See Affidavit attached hereto and hereby incorporated by reference.

Continued on the attached sheet.

s/Amy Meyer

Complainant's signature

Amy Meyer, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence. submitted, attested to, and acknowledged by reliable electronic means.

Date: 7/26/2024

[Handwritten signature]

Judge's signature

Kathryn A. Starnella
United States Magistrate Judge

Printed name and title

City and state: Denver, Colorado

DEFENDANT: TEAK TY BROCKBANK

AGE/YOB: 45/1979

OFFENSE(S): Count 1: 18 U.S.C. § 875(c) – Threats in Interstate Commerce

LOCATION OF OFFENSE: Denver County, Colorado

PENALTY: Count 1: NMT 5 years' imprisonment; NMT \$250,000 fine, or both; NMT 3 years' supervised release; \$100 Special Assessment.

AGENT: Special Agent Amy Meyer, FBI

AUTHORIZED BY: Cyrus Y. Chung
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less; over five days

THE GOVERNMENT:

will seek detention in this case based on 18 U.S.C. § 3142(f)(1) and/or (f)(2).

will not seek detention

The statutory presumption of detention is not applicable to this defendant.

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Amy Meyer, being duly sworn, depose and state under penalty of perjury that the following is true to the best of my information, knowledge, and belief:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since 2004. I am currently assigned to the Denver Division of the FBI and specifically to its Squad CR-2 handling civil rights and public corruption matters. I currently serve as the Denver Division’s Election Crimes Coordinator. During my tenure with the FBI, I have participated in investigations involving the distribution of controlled substances, public corruption and drug-related public corruption, civil rights (color of law, human trafficking, FACE Act violations, and hate crimes), child pornography, health care fraud, insider trading, and international terrorism. I routinely work with other, more experienced FBI agents and have benefitted from their experience. I graduated from New Agents Training at the FBI Academy in Quantico, Virginia in July 2004.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officials, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant and criminal complaint and does not set forth all of my knowledge about this matter.

3. I submit that probable cause exists to believe that between on or about September 22, 2021, and on or about August 4, 2022, in the State and District of Colorado, Teak Ty Brockbank (“BROCKBANK”) issued numerous threatening interstate communications, in violation of 18 U.S.C. § 875(c).

FACTS IN SUPPORT OF PROBABLE CAUSE

4. BROCKBANK (DOB: 5/1/1979) is an individual who resides at 10740 Rd. 24.4 Loop, Cortez, CO 81321.

5. The government has been investigating the user of two different social media accounts—both with the user name “Teakty4u”—for making threatening communications in interstate commerce.

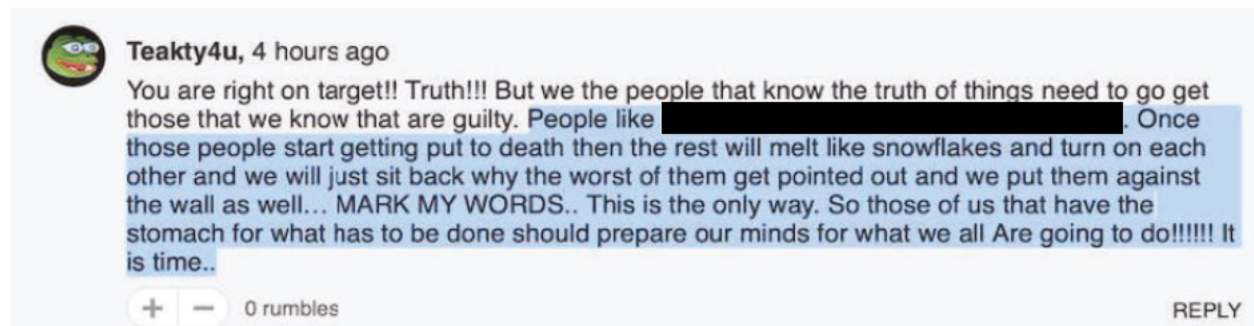
6. On or about August 4, 2022, the Denver-based [REDACTED] circulated to Colorado-based federal law enforcement authorities a series of threatening communications that referenced [REDACTED] and [REDACTED] [REDACTED].

- a. The communications included threatening posts made on Rumble—a video technology provider and social media platform that operates like YouTube, offering users the ability to, *inter alia*, post videos and comment on those videos—by an individual using an account with the user name “Teakty4u” (the “TEAKTY4U RUMBLE ACCOUNT”).
- b. The posts also included threatening posts made on Gab—a social media platform that operates in a manner similar to X (formerly Twitter), offering users the ability to post statements with a character limit—by an individual using an account with the user name “Teakty4u” (the “TEAKTY4U GAB ACCOUNT”).

The TEAKTY4U RUMBLE ACCOUNT Was Used to Make Threatening Communications

7. [REDACTED] provided screenshots of the posts from the TEAKTY4U RUMBLE ACCOUNT to the FBI. The posts included the following:

- a. On or about August 4, 2022, a Rumble user with user name “ThankQ” posted: “All have heard [sic] on all the Patriot channels is whining. Do something. If you think this will be solved without violence, you are a fool.” The user of the TEAKTY4U RUMBLE ACCOUNT responded a few hours later: “You’re exactly right 100% on target!! People just like [REDACTED] and [REDACTED] Our communist!! They are bought and paid for by people like George Soros Mark Zuckerberg and they’re like!! What these people are doing is treason subversion of the American people’s will!! There is no other answer but to execute these people for their actions!! There has to be accountability or this country is lost.”
- b. Approximately one hour later, the TEAKTY4U RUMBLE ACCOUNT posted again on Rumble (in response to a commenter stating that the “People just need to step in and start taking the County [sic] back” and asking “what the hell are people wanting [sic] for”): “You are right on target!! Truth!!! But we the people that know the truth of things need to go get those that we know that are guilty. People like [REDACTED] .. Once those people start getting put to death then the rest will melt like snowflakes and turn on each other and we will just sit back why the worst of them get pointed out and we put them against the wall as well... MARK MY WORDS.. This is the only way. So those of us that have the stomach for what has to be done should prepare our minds for what we all Are going to do!!!!!! It is time..” A screenshot of this latter post, which is generally representative of the posts provided to the FBI by [REDACTED], appears immediately below:



8. On January 31, 2023, the Hon. James P. O'Hara, United States Magistrate Judge, issued a search warrant authorizing the government to obtain certain content from the TEAKTY4U RUMBLE ACCOUNT from Rumble, including the posts described above. Rumble has responded to the search warrant with records corroborating the existence of the posts described above. These records contained additional threatening posts made by the TEAKTY4U RUMBLE ACCOUNT, including but not limited to the following posts:

- a. On or about October 2, 2021, the user of the TEAKTY4U RUMBLE ACCOUNT posted: "The judge making the decisions for Montezuma County in Colorado... Cortez Communist Colorado is a Nazi. Probably doesn't even know that he is a fascist but a fascist he is to the letter... What can I do to stop this MAN that has been Told he is violating our Constitution. More and more and more as time goes on. but then tries to say O He was given the power to violate our Constitution by Congress!!!!!! I could pick up my rifle and I could go put a bullet in this Mans head and send him to explain himself to our Creator right now. I would be Justified !!! Not only justified but obligated by those in my family who fought and died for the freedom in this country. . . .i've watched been going on and what is going on in our community . We know what he is doing and We know what he is??? What can I do other than kill this man my self? No one will do it for me I do live in Communist Colorado... WWG1WGA."
- b. On or about July 24, 2022, the user of the TEAKTY4U RUMBLE ACCOUNT posted: "I'll truly believe there is no other way to fix this mess in Colorado and places like Arizona without executing these evil people. The people have to take matters into their own hands. People like the [REDACTED] the [REDACTED] have to be put to death. Not to court trials and crooked judges Incompetent law-enforcement. . . ."
- c. On or about November 11, 2022, the user of the TEAKTY4U RUMBLE ACCOUNT posted: "A reporter walked up on [REDACTED] yesterday while she was eating lunch she was so scared out of her mind she made a scared noise and spilled her drink all over the place because she was so shaken up. She was not scared like that because of a reporter wanting to ask her questions she thought someone was walking up to kill her!!! Because she knows what she has done and is doing with people like the sheriff deserves the death penalty!! [REDACTED] and people like her like this sheriff know

that we the people have every right to walk up to one of them and execute them for their actions. They know it!!!"

The TEAKTY4U GAB ACCOUNT Was Used to Make Threatening Communications

9. Along with the production of the aforementioned posts from the TEAKTY4U RUMBLE ACCOUNT, the [REDACTED] also provided screenshots of posts from the TEAKTY4U GAB ACCOUNT to the FBI. These posts included the following:

- a. On or about September 22, 2021, the user of the TEAKTY4U GAB ACCOUNT posted (apparently in response to earlier posts by two other Gab users): "Me to. I'm ready. I'm physically ready I'm mentally ready I know who needs to be held accountable in my ((Community)) and in my ((State)). When are the rest of you going to join me so we can start this!! No one else is going to do it for us we will have to do it ourselves history proves that there is no accountability for people in this country unless they are citizens. . . . My life is nothing with the way this country is going the future of this country my future is nothing like I said I'm ready let's do this the law doesn't work most laws are crooked anymore lets fix this shit ourselves or our futures are not worth living and you will look back in the future from this day forward and you will think to yourself I will give every day back for a chance to come back to this time when I knew who needed to be put down and held Accountable for their Actions and HANDLE IT!! We are Justified."
- b. Also on or about September 22, 2021, the user of the TEAKTY4U GAB ACCOUNT posted (in response to a post about [REDACTED] [REDACTED] [REDACTED] purportedly "[d]estroy[ing]" election data): "I live in Communist Colorado and this Crazy liberal and many others in Communist Colorado needs to- No has to Hang she has to Hang by the neck till she is Dead Dead Dead. There will be accountability for these peoples actions in Communist Colorado and it won't be judges and it won't be weakmided [sic] cops that bring it!!! It will be Me it will be You it Will be every day people that understand that there life does not matter anymore with the future our country has laid out before it by Robber Barons /Unelected Bureaucrats/ Libtards. . . ."
- c. Also on or about September 22, 2021, the user of the TEAKTY4U GAB ACCOUNT posted (in response to a post about attorney Sidney Powell's legal team): "I live in Communist Colorado. [REDACTED] and many others have to HANG. These people have to hang by the neck till they are Dead Dead Dead . . . No One else is going to do it for us we will have to do it ourselves!!!! Grow some balls realize that your future is screwed anyways but you can make it better for others ... Mark My Words."

- d. On or about July 20, 2022, the user of the TEAKTY4U GAB ACCOUNT posted (in response to a post about the purported arrest of an ATF agent): “ATF CIA FBI show up to my house I am shooting them peace’s of shit first No Warning!! Then I will call the sheriff!!! With everything that these piece of shit agencies have done I am completely justified to just start dropping them as soon as they step on my property! justified.”
- e. On or about July 23, 2022, the user of the TEAKTY4U GAB ACCOUNT posted (in response to an earlier post about purported election fraud in Colorado): “so the cheating continues. We are gonna have to take care of these people ourselves. Our law-enforcement are incompetent our judges are incompetent George Soros paid for funded puppets are running our state. It’s time for the American people to take matters into their own hands start eliminating those that we know are guilty!! There is no other way! Mark my words. We have to go to war with these people right now!!”

10. On April 3, 2023, the Hon. James P. O’Hara, United States Magistrate Judge, issued a search warrant authorizing the government to obtain certain content from the TEAKTY4U GAB ACCOUNT from Gab, including the posts described above. Gab has responded to the search warrant with records corroborating the existence of the posts described above.

11. Because both Rumble and Gab are hosted on the Internet, there is probable cause to believe that these threatening posts transited in interstate commerce. Additionally, representatives of Rumble and Gab have indicated that the companies have no servers in the District of Colorado, where Brockbank has resided for years.

***BROCKBANK is the User of the TEAKTY4U RUMBLE ACCOUNT
and the TEAKTY4U GAB ACCOUNT***

12. The FBI has sought to ascertain the identity of the user(s) of the TEAKTY4U RUMBLE ACCOUNT and the TEAKTY4U GAB ACCOUNT. There is probable cause to believe that BROCKBANK is the user of both accounts.

The TEAKTY4U RUMBLE ACCOUNT

13. Rumble produced basic subscriber records to law enforcement concerning the TEAKTY4U RUMBLE ACCOUNT. According to Rumble records, the user of the TEAKTY4U RUMBLE ACCOUNT is “Teak Brockbank,” with a birth date of May 1, 1979, and a phone number of “970-739-8547.” Rumble records indicate that the TEAKTY4U RUMBLE ACCOUNT was created on or about October 21, 2020. The user initially provided Rumble with an address of 910 Memorial Dr., Cortez, Colorado 81321, an address associated with BROCKBANK until early 2022. (One Rumble subscriber record appears to contain a possible misspelling of the street name associated with the TEAKTY4U RUMBLE ACCOUNT, listing the street as “memoral.”) Rumble records also show that the user of the TEAKTY4U RUMBLE ACCOUNT registered and confirmed that account via the email address “teakty1@hotmail.com.”

14. LexisNexis and other law enforcement databases corroborate the existence of an individual who matches the information described above. These records indicate that there is an individual named Teak Brockbank who in fact at one time lived at 910 Memorial Dr., in “Trlr 6” in Cortez, Colorado, 81321. The records also indicate that this individual lived at some time in Cave Creek, Arizona. Given that the user of the TEAKTY4U RUMBLE ACCOUNT also threatened an [REDACTED], the Arizona address associated with BROCKBANK further suggests that he is the user of the TEAKTY4U RUMBLE ACCOUNT. Law enforcement database records further indicate that BROCKBANK’s date of birth is May 1, 1979 (which corroborates the birth date listed in Rumble records).

15. Additionally, Rumble records indicated that the TEAKTY4U RUMBLE ACCOUNT was linked to a PayPal account. This is corroborated by PayPal records. PayPal

maintains an account with user “teak brockbank,” associated with the email address “teakty1@hotmail.com” (which, again, is the same email address associated with the TEAKTY4U RUMBLE ACCOUNT). PayPal records contained multiple addresses for BROCKBANK, including the 910 Memorial Dr. #6, Cortez, Colorado address (which was entered into PayPal on April 20, 2017; January 9, 2020; and April 13, 2020). The records indicate that more recently, however, BROCKBANK is associated with 10740 Road, 24.4 Loop, Cortez, Colorado, 81321. These latter records are dated May 15, 2022, and September 3, 2022.

16. In or about early February 2023, law enforcement conducted surveillance near the 10740 Rd., 24.4 Loop address. During the surveillance, an agent observed a Toyota with a license plate associated with BROCKBANK.

17. As described above, Rumble recently produced content associated with the TEAKTY4U RUMBLE ACCOUNT. In one of the posts made by the user of the account, the user wrote: “I’m from Cortez.”

18. Finally, numerous IP addresses that logged into the TEAKTY4U RUMBLE ACCOUNT traced back to BROCKBANK.

The TEAKTY4U GAB ACCOUNT

19. In response to a subpoena, Gab provided records concerning the TEAKTY4U GAB ACCOUNT.

20. Gab records contained significantly less information about the user of the TEAKTY4U GAB ACCOUNT than were contained in Rumble's records concerning the TEAKTY4U RUMBLE ACCOUNT. There are, however, at least four reasons to believe, based on the Gab records, that the TEAKTY4U GAB ACCOUNT is controlled by BROCKBANK.

21. First, according to Gab records, the email address associated with the TEAKTY4U GAB ACCOUNT is "teakty1@hotmail.com." This is the same email address associated in Rumble and PayPal records with BROCKBANK.

22. Second, the user name for both the TEAKTY4U GAB ACCOUNT and the TEAKTY4U RUMBLE ACCOUNT is "Teakty4u," which appears to contain BROCKBANK's first name ("Teak").

23. Third, some of the language posted by the TEAKTY4U GAB ACCOUNT closely resembles the language posted by the TEAKTY4U RUMBLE ACCOUNT. For example, aside from criticizing the same two officials ([REDACTED]), the user of both the TEAKTY4U RUMBLE ACCOUNT and the TEAKTY4U GAB ACCOUNT repeatedly posted about "robber barons."

24. Finally, at least one IP address that logged into the TEAKTY4U GAB ACCOUNT traced back to BROCKBANK (although at least one such login traced to another individual, perhaps because BROCKBANK was using this individual's device or Internet access point).¹

BROCKBANK's Historical Possession of Firearms

25. Brockbank also has a lengthy history of illegally possessing firearms, which can be evidence relevant to an intent or ability to carry out threats of lethal force (which, in turn, is probative of BROCKBANK's state of mind).

26. In or about 2002, in the state of Utah, BROCKBANK was convicted of attempted theft by receipt of stolen property in violation of Utah Code Ann. § 76-6-408. Based on criminal history records—including the judgment of conviction—obtained by law enforcement, this offense was a felony. Accordingly, BROCKBANK may not (1) possess any firearm or ammunition in or affecting commerce or (2) receive any firearm or ammunition which has been shipped or transported in interstate commerce.

27. In the course of reviewing BROCKBANK's Apple iCloud account, the undersigned discovered numerous photographs and videos showing an individual who appears to be BROCKBANK possessing both firearms and ammunition.

¹ Based on text messages in an Apple iCloud account associated with BROCKBANK, which law enforcement agents have reviewed pursuant to an earlier search warrant, BROCKBANK provided his user name and password for his online accounts to his parents ("I give all my accounts to my parents") and, separately, has provided the user name and password to his Rumble account to at least one other individual. Nevertheless, the content and non-content data associated with the account suggest that the posts were authored by BROCKBANK.

28. BROCKBANK appears in multiple “selfie” photographs and videos wearing a distinctive brown sweatshirt with the words “TELLURIDE GRAVEL” on it. Below is one example:



29. In a video discovered in the Apple iCloud account, BROCKBANK appears at a political rally in Colorado Springs, Colorado, speaking with a reporter and wearing the same “TELLURIDE GRAVEL” brown sweatshirt:



BROCKBANK introduces himself as “Teak” near the start of the video. He also states that he is from the “Four Corners area” near southwestern Colorado.

30. In a video that metadata indicates was created on or about March 9, 2020, BROCKBANK appears in the same distinctive brown sweatshirt firing multiple rounds with a rifle (a shell casing is visible near the top left of the below screenshot from that video):



31. In addition, BROCKBANK’s Apple iCloud contained numerous other photographs of firearms and ammunition that appear to belong to BROCKBANK. A few examples are pictured below, along with any date metadata associated with the images:



Dated 9/6/2020



Dated 9/21/2020



Dated 1/3/2023



Dated 12/23/2021



No date metadata



Dated 12/23/2019

32. Certain text messages in BROCKBANK’s Apple iCloud from late 2020, which law enforcement agents have reviewed pursuant to a search warrant, appear to suggest that BROCKBANK believed at one time that he was authorized to possess firearms notwithstanding his felony conviction. Nevertheless, there is reason to believe that BROCKBANK is at the very least *currently* aware that he may not possess firearms. In or about August 2023, BROCKBANK sought to purchase a firearm, but was not permitted to complete the sale and subsequently appealed that determination. The appeal was denied, and BROCKBANK was informed in or about September 2023 by the state of Colorado that he was not legally authorized to purchase a firearm. Specifically, state records reflect that BROCKBANK downloaded the denial letter on or about September 25, 2023.

BROCKBANK's Recent Communications

33. On May 23, 2024, the Hon. James P. O'Hara, United States Magistrate Judge, issued a second search warrant for BROCKBANK's Apple iCloud account. Communications in the account reflected BROCKBANK's continued interest in violence toward public officials as well as his ongoing and recent illegal possession of firearms.

34. For example, in one text message BROCKBANK sent to a group of individuals on or about November 12, 2021, he stated:

There has to be accountability. We the People in this country are at Fault. There are three letter agencies that have been and are doing and getting away with this crazy shit. Crazy Shit.. in our country under our watch. Patriots have to rise up and bring accountability to these fuckn trash people. Hand it out swiftly and without mercy. Nobody should care what their reasons are or why they think they should have done it. The fact is they did it and are still at it.. destroying our nation and going against everything it stands for. The only way forward is for all of them to be put down!!! They have to leave this earth immediately. These weak minded foolish people have to go explain themselves to our creator. Why those of us that understand all of this shit going on need to stick around and straighten all this out.. There is no other way this country Will survive what its people have already done in less accountability and the removal of the crooked. complete removal is the only way forward.

35. Similarly, on or about December 20, 2023, BROCKBANK texted his stepfather, "Four judges in Colorado have removed President Trump from the ballot in Colorado. their names have been added to my list.....their names have been moved to the front of my list..."

36. BROCKBANK also acknowledged his felon status in one text message sent to his stepfather on or about September 6, 2023 ("I have a felony for receiving stolen property, a class five felony"), but subsequent messages indicate that he continues to illegally possess firearms. For

example, on November 30, 2023, BROCKBANK texted another individual, “[N]ow I do not go anywhere without a firearm.”

CONCLUSION

37. Based on the foregoing, I respectfully submit that there is probable cause to believe that between on or about September 22, 2021, and on or about August 4, 2022, in the State and District of Colorado, BROCKBANK issued numerous threatening interstate communications, in violation of 18 U.S.C. § 875(c).

38. Therefore, I respectfully request the issuance of an arrest warrant and criminal complaint charging the same.

I, Amy Meyer, being duly sworn according to law, depose and say that the facts stated in the foregoing affidavit are true and correct to the best of my knowledge, information and belief.

s/ Amy Meyer
Amy Meyer
Special Agent, FBI

Submitted, attested to, and acknowledged before me by reliable electronic means on July 26, 2024.



THE HON. KATHRYN A. STARNELLA
UNITED STATES MAGISTRATE JUDGE

Affidavit reviewed and submitted by Cyrus Y. Chung, Assistant United States Attorney.

UNITED STATES DISTRICT COURT

for the
District of Colorado

United States of America

v.

Teak Ty Brockbank

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Case No.

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Teak Ty Brockbank,

who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 875(c), Threats in Interstate Commerce

Date: 7/26/2024



Issuing officer's signature

City and state: Denver, Colorado

Hon. Kathryn A. Starnella, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title