

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 26-cr-0202-RMR

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVIN LEE TOMPKINS,

Defendant.

INDICTMENT

The Grand Jury charges:

COUNT 1

On or about June 27, 2026 in the State and District of Colorado, the defendant, KEVIN LEE TOMPKINS, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, namely a New York State judicial officer.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 2

On or about June 30, 2026 in the State and District of Colorado, the defendant, KEVIN LEE TOMPKINS, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, namely individuals at the Federal Bureau of Investigation (FBI), the Colorado Bureau of Investigation (CBI), and state and local police departments.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 3

On or about June 30, 2026, in the State and District of Colorado, the defendant, KEVIN LEE TOMPKINS, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, namely individuals at the Federal Bureau of Investigation (FBI), the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), the Colorado Bureau of Investigation (CBI), and state and local police departments.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 4

On or about July 8, 2026, in the State and District of Colorado, the defendant, KEVIN LEE TOMPKINS, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, namely persons of the Muslim faith, police officers, district attorneys, judges, politicians, agents of the Federal Bureau of Investigation (FBI), and agents of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF).

All in violation of Title 18, United States Code, Section 875(c).

COUNT 5

On or about August 5, 2026, in the State and District of Colorado, the defendant, KEVIN LEE TOMPKINS, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition in and affecting interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The allegations contained in Count 5 of this Indictment are hereby re-alleged and

incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violation described in Count 5 above, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all ammunition involved in the commission of the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

Ink signature on file in Clerk's Office
FOREPERSON

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