

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America

v.

Paul Richard Lukas

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Case No.

2:26-mj-1046-TRR

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 January 30, 2026 in the county of Lee in the Middle District of Florida, the defendant(s) violated:

Code Section 18 U.S.C. § 875(c) Offense Description Transmitting in Interstate Commerce a Threat to Injure

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

/s/ Loussanda Moran

Complainant's signature

Special Agent Loussanda Moran, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 2/5/2026

[Handwritten signature of Timothy R. Rice]

Judge's signature

City and state: Fort Myers, Florida

Timothy R. Rice, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Loussanda Moran, having been duly sworn, hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), currently assigned to the Fort Myers Resident Agency of the Tampa Division. I have been employed as a law enforcement officer since September 2015 and have been employed with the FBI since January 2025. I have received training at the FBI Academy in various aspects of criminal investigations, such as witness and investigative interviews, search and arrest warrant operations, physical and electronic surveillance, and confidential human sources.

2. I am presently assigned to investigate a variety of matters including the investigation of criminal offenses involving threatening communications which constitute violations of 18 U.S.C. § 875. As an FBI Special Agent assigned to the Fort Myers Resident Agency, I often work with local, state, and other federal agencies during my investigations. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws in the United States, and to execute search warrants and arrest warrants issued by federal and state courts.

3. I submit this affidavit in support of a criminal complaint charging Paul Richard Lukas, date of birth (DOB) 10/23/1974, with violations of 18 U.S.C. § 875(c) (transmitting in interstate commerce a threat to injure).

4. I make this affidavit from personal knowledge based on my participation in the investigation, information from law enforcement officers, and information gained through my training and experience.

5. Venue is proper in the Middle District of Florida because the offenses occurred in and affected this District, including Cape Coral, and the communications traveled in interstate commerce via phone.

6. Because this affidavit is submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint, I have not set forth each and every fact that I learned as a result of this investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause that a violation of federal law has been committed. Unless otherwise noted, all statements of other persons described in this affidavit are set forth in substance and in part, rather than verbatim.

PROBABLE CAUSE

7. On January 30, 2026, the FBI National Threat Operations Center (NTOC) received a complaint from M.B., a resident of Anchorage, Alaska, who received a phone call from her nephew, Paul Richard Lukas, a resident of Cape Coral, Florida, making several death threats towards his sister, L.L., a resident of the State of Georgia.

8. The following information was provided to your Affiant by M.B., unless otherwise noted.

9. On January 30, 2026, while M.B. was speaking to her nephew on the phone, Lukas made several comments about wanting to harm his sister, L.L., and L.L. kids. M.B. stated that Lukas planned on getting his license on February 3, 2026, and he stated that he would drive to Georgia to kill L.L. M.B. stated that Lukas has been making threats towards members of their family for years. Lukas' father passed away in May 2025, while Lukas was serving time in prison. Since Lukas' release, on December 23, 2025, he is adamant that his sister L.L. stole or disposed of personal items that their father left him, including several guns. M.B. stated that Lukas' father sold the guns before he passed away, but Lukas does not want to believe that.

10. Prior to Lukas' father's passing, Lukas' father lived in a duplex that he owned in Cape Coral, Florida. Lukas' father rented the other half of the duplex to A.R., and A.R.'s parents. When Lukas' father began battling a terminal illness, A.R. and A.R.'s parents would assist Lukas' father in many ways because L.L. was not living near her father and Lukas was in prison.

11. Lukas believes that his father's renters, especially A.R., took advantage of the situation and stole Lukas' valuables. Lukas also believed that his sister and A.R. conspired to sell and discard valuable items his father had left Lukas.

12. Before Lukas was released from prison on December 23, 2025, M.B. knew that Lukas would contact her. Because Lukas was making threatening comments to members of the family while in prison, M.B. decided to invest in an

audio recording device for her phone, so that when Lukas called, she could document any threats made by Lukas.

13. M.B., located in Alaska, recorded the call made on January 30, 2026, at approximately 3:18 PM Eastern Standard Time, 11:18 AM Alaska Standard Time, in which Lukas made vile threats against his sister and the renters [File number phone_20260130-111810__12395175028.amr] . M.B. provided the call to your Affiant, who listened to it in its entirety. The communication lasted approximately ten minutes. A non-verbatim excerpt of comments made by Lukas are below:

- a. I am not going to be alive for much longer.
- b. You're going to have to deal with all this shit sooner or later.
- c. I have had enough of this. I don't want to be in this world.
- d. I don't want to be here, I don't want to do this anymore.
- e. You're going to be hearing about my funeral arrangements very soon.
- f. Fuck this, I don't care, I got everything together .
- g. I was born in the wrong century.
- h. I have gone through 20 grand since I've been out.
- i. Oh, these great tenants, fucking piece of shit.
- j. When I see this son of bitch I'm going to cut his head off, and there's no getting out of it, dude.
- k. You sold all my shit, and my sister threw all my shit away.
- l. You've got to realize where I am from, I am a gangster dude.
- m. If I don't do it, someone else will do it.
- n. They fuck with the wrong cracker.
- o. This is my fourth time going to prison.

14. Lukas then stated that, while he was away, L.L. and the tenant, A.R., conspired to keep him from finding out anything about his father's medical condition. Lukas stated that he's going to find A.R., and it is going to be on. Lukas advised M.B. that she would see him on the news in Alaska. Lukas continued to say the following:

- p. I'm going to drive to Georgia.
- q. I get my license on Tuesday.
- r. God forbid when I go psycho.
- s. And I am, I don't care about any of this.
- t. But I'm going to kill my sister, I'm going to kill the tenants, and I have one more motherfucker on my [inaudible] the snipers are going to have to blow my brains off.
- u. I am going to hell.
- v. I don't want to be on this earth anymore.
- w. I do not want to be here anymore.
- x. I am done.
- y. And these people want to fuck with me, are you out of your fucking mind.
- z. You know how fucking nuts, I know I am nuts.
- aa. You damn right I'm going to kill your fucking ass.

15. Lukas then became irate with M.B. M.B. decided she could not speak to Lukas because he was upset, and she hung up the phone and contacted the NTOC at approximately 3:49 PM Eastern Standard Time, 11:49 Alaska Standard Time.

16. The NTOC contacted your Affiant and relayed the cyber complaint made by M.B.. Prior to speaking to M.B., based on the severity of the alleged threat and comments made, your Affiant contacted the Cape Coral Police

Department at 10:23 PM on January 30, 2026, and requested a well-being check for Lukas. Your Affiant wanted to make sure that there were no firearms or children in Lukas's home and have him assessed for a well-being check. Your Affiant also requested that Lukas be evaluated for the Baker Act.

17. On January 30, 2026, at approximately 11:10 PM, Cape Coral Police Officer Marquez, Badge # 2450, called your Affiant after making contact with Lukas. According to the officers, Lukas appeared to be in good health and in a good state of mind. Lukas remained calm when the officers approached him and allowed them into his home to look around. Officers noticed a few empty rifle cases, but Lukas told them that L.L. had stolen the rifles and only the cases were in the house. Lukas claimed to have zero plans to go to Georgia, where L.L. lives, to harm her or anyone else. Officer Marquez reported that Lukas did not meet the criteria of the Baker or Marchman Acts.

18. On January 31, 2026, at approximately 6:30 PM, your Affiant contacted Lukas' father's former tenant, A.R. via landline. A.R. informed your Affiant that the last time he spoke with Lukas was around May 2025. A.R. explained that his and Lukas' relationship soured when Lukas, while in prison, asked A.R. to take his father's debit and credit cards to withdraw money and send it to a friend of Lukas. A.R. declined to do so. Lukas then asked A.R. to go into his father's duplex and remove a few items to give to a female friend, but A.R. again declined. Lukas became infuriated with A.R. and would call him via the prison phone to threaten him. Since Lukas was released from prison on

December 23, 2025, A.R. has not heard from Lukas. A.R. stated that Lukas does not know where he lives, though Lukas could contact him by phone if he wishes, as A.R. has not changed his number. A.R. was not in fear for his life.

19. On January 31, 2026, at approximately 7:42 PM, your Affiant received a phone call from L.L., and she stated the following:

20. L.L. described Lukas' relationship with his parents as a violent one; however, L.L. stated that her parents would always cover up for Lukas and try to right some of his wrongdoings. L.L. stopped speaking to her parents for 17 years because of a violent encounter that took place in the home where Lukas held a gun over her then-infant son's head while the infant slept. L.L. wanted to call the cops to report the incident, but her mother interjected by holding a knife to L.L.'s throat and preventing her from doing so. L.L. did not speak to her parents again until they were on their deathbeds. L.L. stated that Lukas inherited everything from their parents because he threatened his dad to change the will.

21. L.L. stated that Lukas believes that she intentionally sold her father's firearms; however, L.L. stated that their father had hired a company to sell the guns for him prior to his death. L.L. stated that her father sold the firearms because he knew Lukas was coming home, and as a convicted felon, he did not want him to have access to any firearms.

22. The last time L.L. spoke to Lukas on the phone was December 26, 2025. During that call Lukas became angry with L.L. and began accusing her of

stealing the firearms and selling them without his permission. After the phone call on December 26, 2025, L.L. decided not to speak to Lukas anymore.

23. The last time that Lukas contacted L.L. directly was January 21, 2026, when he left her a voicemail stating in part:

- a. You sold my shit, now I know what you did.
- b. You better love your children.
- c. You better love your husband.
- d. You better love everybody you got to fucking love.
- e. That's all I'm going to tell you.
- f. Because this is how things turn out in the end when you fuck up.

24. The voicemail was provided to your Affiant, who listened to it in its entirety, file name "voicemail-E4D076CA-132C-43EC-B763-FC5A141A2112," and is being stored at the FBI evidence room.

25. On February 2, 2026, your Affiant met with Lukas at his residence, 153 SE 13th St, Cape Coral, Florida, 33990. Lukas appeared calm and sober. Lukas invited your Affiant and Det. Hicks into his residence. Lukas was informed of the reason for the visit and explained that he did not recall making the call or the particular threatening statement to M.B. about his sister, L.L. He did remember telling M.B. that he wanted to "bash [A.R.'s] head in." Lukas further explained that A.R. and A.R.'s family lived in the unit next door, did not pay rent for a year, and took advantage of Lukas being in prison and Lukas' father being in poor health. Your affiant told Lukas to refrain from contacting members of family, particularly L.L., and making threatening statements. Lukas vowed to no longer drink and that he would not contact L.L.

26. Lukas stated that he did drink approximately one bottle of rum on Friday, January 30, 2026. He claimed to have been diagnosed as bi-polar and takes medication to treat his condition, however, he did not take the medication when in prison and has learned to manage his illness.

27. Lukas admitted that his cell phone is his primary device when he contacts his family. Lukas also explained that he does not have a valid driver's license but planned to get it reinstated.

28. On February 4, 2026, your affiant spoke with L.L. and M.B., who explained that while in prison, Lukas was upset with how assets were being managed by the family and would often contact M.B., L.L., and A.R., to air out his issues, and threaten them. Additionally, Lukas would contact another aunt, M.H., of Orlando, Florida, who was appointed as a trustee by Lukas' father to handle his affairs during his final days.

29. On February 5, 2026, your Affiant spoke with M.H. M.H. provided your Affiant with the following voicemail Lukas left on December 25, 2025:

- a. Yea guess who is out of prison.
- b. You need to call me back, my sister is a spiteful ass bitch.
- c. Taking a bed frame, why you throw a bedframe in the garbage.
- d. So, check this out, my shit is missing.
- e. A lot of shit is missing.
- f. So, I am going to tell you this right now.
- g. You are not entitled to shit.
- h. You do not want to fuck with me.
- i. Because I'll have people ride by your fucking house, out in Orlando.
- j. My gangsters have shit going on.

- k. So, listen you don't want to fuck with me and Andy [Inaudible] yea yea yea, you better think about that.
- l. You're going to be all alone, so think about that shit.
- m. Think about what you do.
- n. A lot of my shit is missing, you want to steal shit, you're not entitled to shit.
- o. You never looked at what a trustee is supposed to be.

30. M.H. told your Affiant that a few days after Christmas, Lukas called M.H., acknowledged leaving the threatening voicemail, and apologized.

31. Lukas has an extensive criminal history dating back to 1993. Lukas has been arrested for several drug possessions, driving while under the influence, aggravated assault with a deadly weapon, battery on a person 65-years-old or older, resisting officers, and several charges of battery on an officer, firefighter, EMT personnel.

32. Lukas was last arrested in November of 2022 for Battery on a 65-years-old or older after an incident that took place between him and his father. While in jail, Lukas was charged with additional charges for battery on an officer, resisting an officer without violence, intimidation threat of death, serious bodily harm to LEO, and escape.

33. Lukas was adjudicated guilty on four out of the five charges, and the battery on a 65-years-old or older had a disposition of nolle prosequi. Lukas served 3 years and 1 month in the Florida Department of Corrections and was released on December 23, 2025.

CONCLUSION

Based on the aforementioned information, Lukas knowingly made multiple statements using a cell phone threatening 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. I respectfully submit that probable cause exists to believe that Lukas knowingly violated 18 U.S.C. § 875(c) (transmitting in interstate commerce a threat to injure). Accordingly, I request issuance of the proposed Complaint and Arrest Warrant.

/s/ Loussanda Moran

Loussanda Moran
FBI Special Agent

Affidavit submitted by reliable electronic means and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 this 5th day of February, 2026.



Timothy R. Rice
United States Magistrate Judge