

FILED BY MB D.C.  
**Dec 10, 2025**  
ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - FTP

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-mj-00119-SMM

UNITED STATES OF AMERICA

v.

SYLVAIN VAILLANCOURT,

Defendant.

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**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? **No**
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? **No**
3. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? **No**
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? **No**

Respectfully submitted,

JASON A. REDING QUIÑONES  
UNITED STATES ATTORNEY

By: /s/ Justin L. Hoover  
**JUSTIN L. HOOVER**  
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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Anthony Jimenez, having been duly sworn, do hereby depose and state as follows:

**AGENT BACKGROUND**

1. I am a Special Agent (“SA”) with Homeland Security Investigations (“HSI”), in Fort Pierce, Florida, and have been employed with HSI since February 2019. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, I am authorized by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18 of the United States Code.

2. Prior to my employment with HSI, I was a deputy sheriff with the Orange County Sheriff’s Office in Orlando, Florida for seven years. During my tenure in law enforcement, I have conducted or participated in surveillance, the introduction of confidential sources, debriefings of informants, and reviews of electronically stored information (“ESI”). I also have experience monitoring cellphone location data and using it to conduct surveillance of suspects. During my tenure at HSI, I have been involved with the investigation of cases involving threats to law enforcement and others.

3. I am the federal case agent assigned to this matter, and I am familiar with the facts and circumstances of this investigation. The facts in this affidavit are limited to a determination of probable cause, and as such, I have not included every fact known about this investigation. The facts set forth in this affidavit are based on my personal knowledge, training, and experience; knowledge obtained through communications with other individuals, including other law enforcement officers involved in this investigation; and knowledge gained through a review of the statements and evidence in this investigation.

4. Based on the below facts, there is probable cause that Sylvain VAILLANCOURT committed the offense of interstate transmission of threat to injure, in violation of 18 U.S.C. § 875(c).

**PROBABLE CAUSE**

5. On July 14, 2025, the Surete Du Quebec (“SQ”), which is the provincial police force for the province of Quebec, Canada, contacted the HSI office in Montreal (“HSI Montreal”). SQ advised HSI Montreal that an individual named Sylvain VAILLANCOURT had contacted the Roussillon Police office located in Candiac, Roussillon, Quebec. SQ advised that, between July 13, 2025 at 8:44 p.m., and July 14, 2025 at 12:15 a.m., VAILLANCOURT contacted Roussillon Police dispatch 42 times using a phone number ending in 8195 (the “SUBJECT PHONE”).

6. The SUBJECT PHONE matches a phone number listed, multiple times, for VAILLANCOURT in his United States immigration records.

7. SQ informed HSI Montreal that VAILLANCOURT was calling without any valid emergency reason and threatened the police department dispatch staff. SQ further stated that VAILLANCOURT told emergency dispatch, among other things, that he lives in the United States,<sup>1</sup> has firearms at home including a Glock 9mm and a Sig Sauer, will blow off the head of anyone who comes to his home without a warrant, and that he would act according to the Second Amendment.

8. On July 15, 2025, SQ informed HSI Montreal that the night before, on July 14, 2025, between 6:40 pm and 8:10 pm, VAILLANCOURT called Roussillon Police dispatch 25 times. SQ stated that VAILLANCOURT asked multiple questions related to suspended police

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<sup>1</sup> According to VAILLANCOURT’s Florida driver’s license records, he is a U.S. citizen, but was born in Canada.

officers, and again mentioned that he had loads of guns at his place including two AK47s, a CX-9, and a Glock 48 9mm. SQ stated that VAILLANCOURT said that he was protected by the Second Amendment and warned that if a police officer came to his house without a warrant, he would shoot him right away. SQ further advised that VAILLANCOURT was very repetitive during the calls, mentioned that he was a multimillionaire, and stressed that he had never committed any felony but felt threatened and had guns. SQ advised that VAILLANCOURT stated that “he would beat police officers and shoot them in the head” and then became very emotional and hung up.

9. Investigation revealed that VAILLANCOURT’s harassing communications with Roussillon Police began on or about May 12, 2025, and the last known communication occurred on or about September 20, 2025. VAILLANCOURT primarily used the SUBJECT PHONE to place the calls.

10. Between May 12 and 13, 2025, VAILLANCOURT called Roussillon Police dispatch 29 times. During one of the calls, VAILLANCOURT confirmed that he sent several e-mails via their website, that he had left his telephone number, and that he hoped to get a return call. In the emails that VAILLANCOURT sent to Roussillon Police, the email signature included his full name and the SUBJECT PHONE. VAILLANCOURT continued to send harassing emails over the following weekend in May 2025 and into the month of June 2025.

11. On May 12, 2025, license plate readers captured VAILLANCOURT’s truck, a blue Chevrolet Silverado bearing Florida tag ending in XTE, in Stuart and Sewall’s Point in Martin County, Florida, as well as in West Palm Beach, Palm Beach County, Florida.

12. VAILLANCOURT’s Florida driver’s license records show a registered address on S. Olive Avenue in West Palm Beach, Florida (“the West Palm Beach residence”). On June 28,

2025, VAILLANCOURT submitted a title application to the Florida Department of Highway Safety and Motor Vehicles for a black Ferrari vehicle. On this application, VAILLANCOURT listed his phone number as the SUBJECT PHONE, and his address as a South Ocean Drive address in Jensen Beach, Florida (“the Jensen Beach Residence”).

13. In August 2025, I spoke with an employee at the Jensen Beach residence, who confirmed that VAILLANCOURT has lived at this location since 2024 and drives a truck.

14. Between May 16, 2025, and June 3, 2025, VAILLANCOURT called Roussillon Police dispatch and left several threatening voice messages. For example, during a message dated on or about June 2, 2025, at approximately 11:01 pm, VAILLANCOURT said “I’m watching you! I am following you! I’m right behind you!” and “Come visit me in the USA. I’ll be the one laughing in your face. 2nd amendment. Look it up.”

15. In a message dated on or about June 2, 2025, at 11:26 pm, VAILLANCOURT sent a copy of his U.S. naturalization certificate, which bears VAILLANCOURT’s accurate date of birth, country of former nationality (Canada), naturalization date, state of residence, alien file number, and a photo that appears to be of VAILLANCOURT.

16. Between July 13 and 14, 2025, Roussillon Police dispatch received a total of 42 harassing phone calls from VAILLANCOURT. During these calls, VAILLANCOURT invited the dispatcher to visit his LinkedIn profile. When the dispatcher asked him if he still lived in Jensen Beach, Florida, for the purpose of identifying and possibly locating him, VAILLANCOURT seemed to interpret this question as a threat. VAILLANCOURT then claimed to be in possession of firearms, including a 9mm Glock and a Sig Sauer. VAILLANCOURT made the following threatening statements: “If anyone comes to our house, I’ll blow their head off with bullets and I don’t give a damn who they are.”

17. During calls on or about the following dates, VAILLANCOURT made the following statements<sup>2</sup>:

- a. July 13, 2025: "I'm gonna fucking blow your head off if you come here."
- b. July 13, 2025: "If you come without a warrant, I'll blow your fucking head off, you fucking cunt, and that's a threat right there, right back to you."
- c. July 14, 2025: "You fuck with the wrong guy, let me tell you, you fuck with the fucking wrong guy, you fucking piece of shit, I'll see you."
- d. July 14, 2025: VAILLANCOURT mentioned that he had several firearms at his home, including two AK47s, a CX-9, and a Glock 48 9mm.
- e. July 14, 2025: "If any cop comes into our house with his dirty boots without a warrant, I'll riddle him with bullets. I've got my guns waiting."
- f. July 14, 2025: VAILLANCOURT said he feels threatened and that he has weapons at home. He added that he wants to beat up the police officers and shoot them in the face. He then started crying and hung up the phone.

18. On or about July 23, 2025, a Roussillon Police detective was informed via email from LinkedIn that VAILLANCOURT had viewed his personal profile. It is unknown how or why VAILLANCOURT obtained the detective's name and viewed the profile.

19. During August and early September, VAILLANCOURT made over a hundred calls to Roussillon Police dispatch. VAILLANCOURT became increasingly insistent that he owns firearms and would not hesitate to kill the officers if they showed up at his home without a warrant. For example, on or about September 8, 2025, at around 6:05 p.m., VAILLANCOURT told a dispatcher "don't come to my home without a warrant or I will fucking kill you."

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<sup>2</sup> VAILLANCOURT mostly spoke French during the calls, which have been translated by English-speaking members of Canadian law enforcement.

20. On or about August 9, 2025, VAILLANCOURT called Roussillon Police dispatch many times, and during one call, told dispatch that “if any police officer sets foot in his home without a warrant, he will riddle him with bullets.”

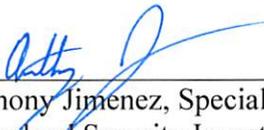
21. On August 9, 2025, license plate readers in Martin County, Florida captured VAILLANCOURT’s black Ferrari bearing Florida tag ending in C64. The Ferrari has been registered to VAILLANCOURT since July 2025.

22. License plate readers logged VAILLANCOURT’s vehicles, his blue truck and black Ferrari, in the Southern District of Florida several times between August and September, 2025.

23. On December 8, 2025, I was informed by a Jupiter, Florida Police Department detective that VAILLANCOURT went to a bail bondsman on December 5, 2025, and attempted to turn himself in.

24. Based on the above facts, there is probable cause that Sylvain VAILLANCOURT committed the offense of interstate transmission of threat to injure, in violation of 18 U.S.C. § 875(c).

FURTHER AFFIANT SAYETH NAUGHT.

  
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Anthony Jimenez, Special Agent  
Homeland Security Investigations

Sworn to before me, by video conference, in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedure, this 10th day of December, 2025.



  
**SHANIEK MILLS MAYNARD**  
UNITED STATES MAGISTRATE JUDGE