

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

United States of America )

v. )

KEYON TISHAYE DICKENS )

Case No. )

1:23-MJ-00052 )

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 October 10, 2023 in the county of Richmond in the Southern District of Georgia, the defendant(s) violated:

Code Section 18 U.S.C. § 844(e) Offense Description Making Threats by Telephone.

This criminal complaint is based on these facts:

See Attached Affidavit of Special Agent Michael Johansen, Federal Bureau of Investigation

Continued on the attached sheet.

Complainant's signature

FBI Special Agent Michael Johansen

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/11/2023

Judge's signature

City and state: Augusta, Georgia

Brian K. Epps, United States Magistrate Judge

Printed name and title

**UNITED STATES OF AMERICA  
SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO. 1:23-MJ-00052</b>
	)	
<b>KEYON TISHAYE DICKENS</b>	)	

**AFFIDAVIT**

I, Michael Johansen, a Special Agent with the Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

1. On October 10, 2023, in Richmond County, within the Southern District of Georgia, the defendant, KEYON TISHAYE DICKENS (hereinafter, referred to as “DICKENS”), used a telephone or other instrument of interstate commerce and affected interstate commerce by willingly or maliciously communicating a threat to kill an individual or destroy a building by means of an explosive. All in violation of Title 18, United States Code, Section 844(e).

2. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since April 2023 and I am currently assigned to the Atlanta Division, Augusta Resident Agency. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. This affidavit is based in part upon my

conversations with law enforcement agents and other people, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation.

3. Based on my participation in this investigation, including my review of law enforcement reports and records, and my conversations with other law enforcement officers and others, as well as my training and experience, I have learned, among other things, that:

4. On October 10, 2023, at approximately 10:30 a.m., an employee of the Social Security Administration (SSA) (identified herein as "SSA Employee 1") located at 115 Robert C. Daniel Junior Parkway, Augusta, Georgia, received a telephone call on her office number from a male who identified himself as DICKENS.

5. Before discussing the purpose of the call, SSA Employee 1 verified that the caller was DICKENS by asking him for personally identifiable information (*e.g.*, his name, address, date of birth, Social Security Account Number (SSAN), and mother's maiden name. DICKENS told SSA Employee 1 he was frustrated regarding a prior outcome with the SSA. During the ensuing phone conversation, DICKENS verbally threatened SSA Employee 1 and stated he was going to come to the SSA building in Augusta, Georgia to shoot it up or blow it up with a bomb. DICKENS stated to SSA Employee 1 that he was on the way to the SSA building in Augusta, Georgia. SSA Employee 1 alerted her onsite supervisor (hereinafter,

identified as “SSA Augusta Manager”) of DICKENS’ telephonic threats. The SSA Augusta Manager notified the security officers at the SSA Security Desk.

6. According to one of the onsite security officers, DICKENS arrived at the SSA office at approximately 11:16 a.m. in possession of a backpack. DICKENS entered the building and checked in at the SSA office and was provided a number to wait to speak to an SSA representative. Several minutes later, Dickens walked over to the Security Desk and handed a security officer a paper towel bearing a handwritten message that read “I have a bomb.” DICKENS then walked out of the SSA office and paced back and forth in front of the SSA office building for approximately ten minutes before walking around the corner of the building and out of view of security cameras.

7. After DICKENS exited the SSA office, the SSA Augusta Manager contacted the Richmond County Sheriff’s Office (RCSO) via 911 and alerted RCSO about DICKENS’ actions, name and physical description. The SSA Augusta Manager told the 911-Dispatcher that DICKENS was previously trespassed from the SSA office in Augusta, Georgia. The SSA Augusta Manager later told your Affiant that DICKENS was trespassed from that office in 2012 and was considered a “High Risk Visitor.”

8. RCSO officers were dispatched to the SSA Augusta office where they arrested DICKENS outside the building at approximately 11:26 a.m. DICKENS dropped his backpack. RCSO officers cleared the area of any bystanders due to the threat of an explosive device.

9. The RCSO Bomb Squad and Bureau of Alcohol, Tobacco, Firearms, and Explosives Bomb Technicians determined on site that DICKENS' backpack contained no explosive devices or materials.

10. The RCSO transported DICKENS to the police station at 400 Walton Way, Augusta, Georgia. Your Affiant and FBI Special Agent Jacob Hagen attempted to interview DICKENS, but he did not want to speak to investigators.

11. DICKENS was charged in Richmond County with making terroristic threats and is being held in the Richmond County Detention Center on that charge.

12. On October 10, 2023, your affiant obtained a copy of DICKENS' criminal history and noted the following arrests and convictions:

a. DICKENS was arrested by the RCSO on April 27, 2004, for willful obstruction of law enforcement officers by use of threats or violence. He was subsequently convicted and sentenced to two years confinement.

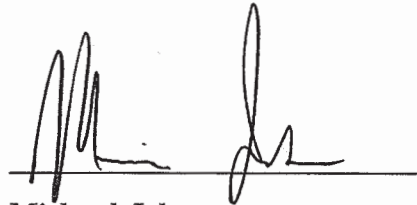
b. DICKENS was arrested by the RCSO on September 9, 2013, for making terroristic threats. Following his conviction, DICKENS was sentenced to 100 hours of community service and five years of probation.

c. DICKENS was arrested by the RCSO on May 12, 2018, for three counts of aggravated assault, three counts of criminal trespass, and one count of criminal damage to property in the first degree. DICKENS was later convicted on all seven counts and sentenced to four years of confinement and ten years of

probation. DICKENS is currently on probation and under supervision from the Georgia Department of Community Supervision.

13. Based on the foregoing, there is probable cause to believe that, in the Southern District of Georgia, DICKENS, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building and other real and personal property by means of an explosive, in violation of Title 18 United States Code, Section 844(e).

Respectfully Submitted,



Michael Johansen  
Special Agent  
United States Department of Justice  
Federal Bureau of Investigation

Subscribed and sworn to before me in accordance with the requirements of Fed. R.

Crim. P.4.1 on October 11, 2023



HONORABLE BRIAN K. EPPS  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF GEORGIA