

UNITED STATES DISTRICT COURT

for the

Northern District of Indiana

United States of America)
v.)
DOUGLAS THRAMS)
)
)
)
)
)

Case No. 3:25-mj-10

Defendant(s)

AMENDED 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 20-22, 2025 in the county of Elkhart in the Northern District of Indiana, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. section 875(c)	Interstate Communications with a threat to injure

This criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Taylor Pletz

Complainant's signature

SA Taylor Pletz, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/24/2025

City and state: South Bend, Indiana

s/Scott J. Frankel

Judge's signature

Honorable Scott Frankel, US Magistrate Judge

Printed name and title



AFFIDAVIT

Comes now your affiant, Taylor Pletz, Federal Bureau of Investigation Special Agent, being sworn, deposes and states the following:

Introduction

I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since June of 2024. I am currently assigned to the FBI’s Indianapolis Field Office where I am a part of the Joint Terrorism Task Force (“JTTF”). As such, I investigate violations of federal law including violations of 18 U.S.C. § 875(c) (interstate communications with a threat to injure). I am a “federal law enforcement officer” within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I am also an “investigative or law enforcement officer” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

I have successfully completed training at the FBI Academy, Quantico, Virginia. During my training at the Academy, I received training in a variety of investigative and legal matters, including the topics of Fourth Amendment

searches, the drafting of search warrant affidavits, and probable cause. As a Special Agent, I am authorized to investigate violations of federal laws and to execute warrants issued under the authority of the United States of America.

Prior to my employment as a Special Agent, I was a Tactical Specialist for the FBI, having worked on a Domestic Terrorism squad for approximately two and half years.

Through training and experience in investigating threats against the government to include interstate communication of a threat, as well as upon information related to me by other individuals, including conversations with other law enforcement officers, I am familiar with the methods used by individuals who commit such crimes. These types of crimes can be planned in advance. Individuals who commit these crimes can often have a manifesto, either digitally or written, detailing their desires for the attacks and the methods they plan to use when conducting the attack. In order to prevent such violent acts, intervention must occur prior.

Based on my training and experience, I know that Title 18, United States Code, Section 875(c) provides that it is unlawful for any person to transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.

On January 23, 2025, the court issued a complaint and arrest warrant based on your affiant's affidavit submitted that day. The affidavit included a typographical error on the top of page 3 of the affidavit, which contained three lines of information inapplicable to this matter. That information has been excised from this affidavit, but this affidavit is otherwise identical to the affidavit submitted January 23, 2025.

Person to be arrested

I seek to arrest and criminally complain Douglas THRAMS (DOB: 07/XX/2001) for violations of Title 18, United States Code, Section 875(c).

The Investigation

The information contained in this affidavit was developed during an investigation conducted by the Federal Bureau of Investigation (FBI). Further information was gathered by the Goshen Police Department, by reviewing reports and conducting research as it relates to Douglas THRAMS, who posted multiple videos threatening violence in furtherance of an anti-government ideology, in the City of Goshen, Elkhart County, in the Northern District of Indiana.

1. At approximately 17:00 CST on January 22, 2025, the Indiana Intelligence Fusion Center sent information to the Federal Bureau of Investigation Indianapolis Division about threats towards the government that were discovered online. This information was referred to the Indiana

Intelligence Fusion Center by Goshen Police Department Detective Jacob Lambright.

2. These violent threats to the government were made by Douglas Thrams on his TikTok social media page. TikTok is an internet-based social media application, and all videos, messages, and other communications on TikTok travel in interstate and/or foreign commerce. Based on how TikTok operates, all videos described below traveled in interstate and/or foreign commerce.

3. Thrams posted multiple videos to his TikTok account on or about January 22, 2025, described below. In all videos, he is visible, audible, and identifiable.

4. In a video posted on TikTok, Thrams had a rifle in his hands and tapped it while stating: "A friendly little reminder (taps rifle) that we do have a Second Amendment right. We also have in our Declaration of Independence the right to take control of the government and even possibly institute a new one. So I ask the question again -- when, where, what time, give me coordinates. As long as other people are going to show up, I will show up. I will bring my Second Amendment right. In fact, I will bring as many as my Second Amendment rights as I can. But I just need to know when we're going to do this, where we're going to do this, how we're going to do this, um,

because it needs to be done. It needs to be done. There is literally no way forward without violence this time. I'm sorry.”

5. In another video, Thrans stated: "Hey can we stop talking about it and actually be about it. Seriously. Stop talking about it. Be about it. Take your Second Amendment, go to your local government building, and fucking be about it. You want to see some real fucking change in this world, stop protesting and stop using your voice, and use your fucking rights. Use your weapons. That's the only way forward."

6. In another video, Thrans stated: "Every US government building needs be bombed immediately." In the same video, he goes on to state "We the people need to band together and use our rights, amendments, and constitutes and take our weapons that are a part of our Second Amendment right to bear arms and either instill the fear of God in the government or use those right to outright just overthrow the government and institute a new one." In reference to President Donald Trump, Thrans stated "he needs to be assassinated and this time, don't fucking miss."

7. In another video Thrans stated: "I am down for the cause. I am down to mow the lawn. I'm down to paint the town red." He additionally made reference to encourage people to go to their local government buildings and not go to the Capitol Building like they did for January 6th (presumably a

reference to the events at the US Capitol Building on January 6, 2021). He stated he is currently looking for some localized groups to join. He then stated: "You tell me where to point that goddam weapon and we can go Nazi hunting." Thrams stated in the same video, "It is in our Declaration of Independence that if we see fit, we the people see fit, that we are being controlled by a tyrannical government, or just an evil one, that we are legally allowed to use our rights, laws, amendments, and constitutes to take control of said government, possibly even enforce a new one if need be. So yes, I'm down for the cause. Like I said, I'm down to paint the town red, but I'm not leading shit. Just tell me where to go."

Conclusion

Because this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of an arrest warrant and a complaint charging Douglas THRAMS with violations of Title 18, United States Code, Section 875(c), it does not contain all information known to me concerning this investigation.

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Further your affiant sayeth not.

Taylor Pletz

Taylor Pletz, Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me
This 24th day of January, 2025.

s/Scott J. Frankel

Honorable Scott J. Frankel
United States Magistrate Judge
Northern District of Indiana
South Bend Division

