

12/20/2024

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**UNITED STATES DISTRICT COURT**

Clerk, U.S. District Court  
By AA Deputy Clerk

**District of Kansas**  
(Wichita Docket)

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**CASE NO.** 24-6337-01-BGS

**MATTHEW JOHN BUCKLES,**

**FILED UNDER SEAL**

**Defendant.**

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**CRIMINAL COMPLAINT**

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**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**

**Threat to Injure**  
**[18 U.S.C. § 875(c)]**

On or about December 19, 2024, in the District of Kansas and elsewhere, the defendant,

**MATTHEW JOHN BUCKLES,**

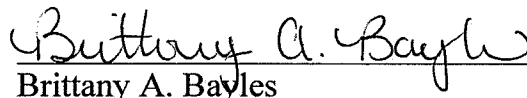
knowingly and willfully transmitted in interstate commerce, between the State of Kansas and State of California, a communication containing a threat to injure the person of another; specifically, **BUCKLES** used a YouTube Channel to state: “in one week I will kill those

who killed him” and similar threats of “I will get my revenge”, such threats being directed to Company Victim 1, and employees thereof, located in the District of Kansas.


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

I further state that I am a Special Agent with the Federal Bureau of Investigations (FBI) and that this Complaint is based on the following facts:

See accompanying Affidavit, which is incorporated by reference as though set out in full herein and offered in support of a finding that probable cause exists to believe the defendant, **MATTHEW JOHN BUCKLES**, committed the offenses set forth in this Complaint.

  
\_\_\_\_\_  
Brittany A. Bayles  
Special Agent, FBI

Subscribed and sworn before me this 20th day of December, 2024.

  
\_\_\_\_\_  
HONORABLE BROOKS G. SEVERSON  
United States Magistrate  
District of Kansas

**PENALTIES**

**Count 1: 18 USC § 875 (Threat by Interstate Communication)**

- 0-5 years imprisonment
- Up to \$250,000 Fine
- Up to 3 years Supervised Release
- \$100 Special Assessment

UNITED STATES DISTRICT COURT  
DISTRICT OF KANSAS

UNITED STATES OF AMERICA	)	
	)	
VS.	)	Case No. <u>24-6337-01-BGS</u>
	)	
MATTHEW JOHN BUCKLES	)	

**AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR CRIMINAL COMPLAINT**

I, Brittany A. Bayles, Special Agent of the Federal Bureau of Investigation, being duly sworn, state the following:

**INTRODUCTION**

1. This Affidavit is being offered in support of an Application for Criminal Complaint for MATTHEW JOHN BUCKLES (hereinafter "BUCKLES"), a white male, date of birth July 11, 1972, for violation of Title 18 U.S.C. 875(c).
2. I have been employed as a Special Agent of the FBI since February 2022. I am currently assigned to the FBI Kansas City Division, Wichita Resident Agency. As a Special Agent of the FBI, I am authorized to investigate violations of laws of the United States of America, and I am a law enforcement officer with authority to execute arrest and search warrants under the authority of the United States of America.
3. The statements contained in this affidavit are based on information known to me as a result of my participation in this investigation or on information provided to me by witnesses or other law enforcement personnel involved in this investigation. The

by witnesses or other law enforcement personnel involved in this investigation. The statements are also based upon the collective experience of other law enforcement personnel involved in this investigation and on my own training and experience.

### PROBABLE CAUSE

4. On December 20, 2024, the FBI National Threat Operations Section received information from Google, LLC reporting YouTube user identified as “Biscuits Brown” had made threatening posts on December 19, 2024. The threats indicated the user planned to take revenge on a company that the user believed to be at fault for the death of the user’s son. The following comments were made by “Biscuits Brown” on his YouTube channel,

(<https://www.youtube.com/channel/UCob2jp8HVsqyuDGfiXAmuUQ>):

- **December 19, 2024 at 8:39 a.m. (PST)**
    - “let your son be murdered and see what your reaction is. I will get my revenge”
  - **December 19, 2024 8:10 a.m. (PST)**
    - “Im to the point i don’t care about any laws. And im never going to jail and will take as many with me. Mark my works i will get my revenge”
  - **December 19, 2024 7:58 a.m. (PST)**
    - “My son was murdered and in one week I will kill those who killed him.”
  - **December 19, 2024 7:57 a.m. (PST)**
    - “I plan on taking revenge soon very soon in a week as a matter of fact.”
  - **December 9, 2024 12:18 p.m. (PST)**
    - “I’m one of them I’m about to go after those in the company that murdered my son at work. OSHA said the company knowingly and willfully kill my son. Now I’m going to kill them.”
5. Previously, on August 20, 2024, the FBI National Threat Operations Section received information from Google, LLC reporting YouTube user “Matt” making threats between August 7, 2024, and August 17, 2024, to the U.S. government, law

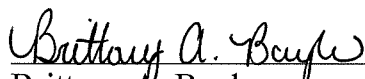
enforcement, and specific ethnic groups. “Matt” also made comments referring to killing immigrants and not one would ever find their bodies.

6. Similarly, on July 14, 2020, the FBI National Threat Operations Section received a tip regarding YouTube user “Here we go again” and threatening communications that had been posted on YouTube related to threatening the Bothell Police Department in Bothell, Washington. “Here we go again” commented on a YouTube video related to a Bothell Police Officer being shot. “Here we go again” stated, “this is good news. Police have no moral authority over anyone. I’ll do the same if they try stopping me”
7. Pursuant to legal process, it was determined all three above-mentioned YouTube accounts belonged to BUCKLES at the time of the communications that were posted:
  - a. The July 2020 account returned to an IP address connected to T-Mobile customer Matt Buckles in Wichita, Kansas.
  - b. The August 2024 and December 2024 accounts shared the same creation IP addresses and login IP addresses, which geo-located to a user in or near Wichita, Kansas. The August 2024 “Matt” account also listed the same birthday as the July 2020 subject, Matt Buckles.
8. Further investigation determined BUCKLES resides in Wichita, Kansas and has utilized YouTube services according to his IP log information related to his YouTube accounts.


9. Additional research into BUCKLES revealed he has a now deceased son who was killed in a work-related accident according to an incident report on the OSHA.gov website.
10. YouTube is under the ownership of Google, LLC that is headquartered in Mountain View, California.

### CONCLUSION

11. Based upon the aforementioned facts, there is probable cause to believe that MATTHEW JOHN BUCKLES committed the offense of interstate communications, in violation of Title 18 U.S.C. 875 (c) for the interstate threats of the former employer of his deceased son, law enforcement, parties working under the United States Government, and a specific ethnic group.

  
\_\_\_\_\_  
Brittany A. Bayles  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED TO AND SWORN before me this 20th day of December, 2024.

  
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HONORABLE BROOKS G. SEVERSON  
United States Magistrate Judge  
District of Kansas