

RECEIVED
U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

DEC 13 2025

DANIEL J. MCCOY, CLERK

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

BY: *It* LAFAYETTE DIVISION

UNITED STATES OF AMERICA

* CASE NO.: 6:25-mj-00229

*

*

* **FILED UNDER SEAL**

*

*

MICAH JAMES
aka "Kateri"
aka "Black Witch"

Criminal Complaint

I, Special Agent Paul Seller, being first duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice since July 2022. I am currently assigned to the New Orleans Field Office, Lafayette Resident Agency. As part of my duties with the FBI, I am charged with the responsibility of investigating violations of the laws of the United States Code and collecting evidence in matters in which the United States is or may be a party of interest. I have received specialized training to perform those official duties and responsibilities and have been exposed to a variety of investigative techniques and resources, which include, but are not limited to, physical surveillance, electronic surveillance, monitoring court-authorized wiretaps, managing the use of confidential human sources ("CHS"), consensual monitoring of conversations, and conducting searches of physical locations.

2. This affidavit is submitted in support of a criminal complaint alleging that **MICAH JAMES LEGNON, aka “Kateri”, aka “Black Witch”**—a resident of New Iberia, Louisiana—violated Title 18, United States Code, Section 875(c) (Threats in Interstate Commerce) (“Target Offense”).

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging **LEGNON** with the Target Offense, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that **LEGNON** committed the offenses alleged in the complaint.

4. This affidavit is based on my personal knowledge, my experience and training, information provided to me by other law enforcement agents and the experience and training of those agents, my review of location information, recorded telephone communications, email and social media communications, numerous witness interviews, open-source information, and information provided by agents and confidential human sources.

PROBABLE CAUSE

5. As detailed below, **LEGNON**, aliases “Dark Witch” and “Kateri The Witch”, is suspected to be associated with members of the Turtle Island Liberation Front (“TILF”).¹ According to a social media page title “Turtle Island Liberation Front

¹ Your Affiant has not confirmed that **LEGNON** is a formal member of TILF. However, he does associate and share similar radical anti-government beliefs.

— LA Chapter,” TILF is dedicated to “Liberation through decolonization and tribal sovereignty.” According to open-source information, “Turtle Island” is a term used by some Native Americans to describe the North American continent. TILF is an anti-capitalist, anti-government movement. As discussed below, based on information from the CHS², a leader of the TILF, identified as Audrey Illeene CARROLL (“CARROLL”) is a member of a Signal messaging group called the “Order of the Black Lotus,” which CARROLL described as a “radical” faction of TILF. Among other things, the co-conspirators in the Signal group chat have used the chat to discuss a bombing plot, including their plan to test explosive devices on or about December 12, 2025.

6. LEGNON is a member of a Signal group “Order of The Black Lotus,” operating under the username of “Darkwitch.”

7. On November 26, 2025, in or around Los Angeles, California, the CHS met with two TILF members: a member known as “Asiginaak,” who was later identified as CARROLL, and a member known as “AK,” who was later identified as Zachary Aaron PAGE. During the meeting, CARROLL provided the CHS with an eight-page, handwritten document containing the title “OPERATION MIDNIGHT SUN.” The CHS also saw that CARROLL appeared to possess three to four additional copies of the handwritten document. Within the document the CHS was provided,

² The CHS is cooperating with law enforcement and is a validated and vetted source. The CHS has been a reliable source of information since in or around August 2021. The CHS is cooperating for financial compensation. The CHS does not have any criminal history. The CHS provided past reliable reporting on other cases and has provided reliable reporting in this case.

there were five target locations identified, classified as “marks,” with five additional blank slots observable under the caption “add more if enough comrades.” The target locations were identified as property and facilities operated by two separate companies that are used or engaged in activities affecting interstate and foreign commerce.

8. Based on a review of the handwritten plan, the document outlined a plan of operation and identified that there would be teams of four “otg,” or on the ground participants, plus one additional person who would assist the “otg” co-conspirators (the “off ground” member). Specifically, three members of each team would plant “backpacks with ieds at different points along their assigned buildings.” The listed “ieds” would be “complex pipe bombs.”³ One member of each team would create graffiti of a “red triangle and 1 message of the team’s choosing on the sidewalk closest to the building while the other 3 are placing the devices.” The designated “off ground team member” was assigned to be listening to police scanners or in a vehicle in case “an emergency get away is needed.” The written plan instructed that the bombs were to be detonated simultaneously on New Year’s Eve.

9. The plans described multiple operational security measures the co-conspirators should take to conceal their identities, such as the use of a burner phone that would be disposed of after the bombings by “submerging it in a concrete brick after destroying the sim and then disposing of the brick in a body of water.” The

³ Based on the information contained in the attack plan, I understand “complex pipe bomb” to refer to multiple explosive devices affixed to one another to make a larger explosive device.

target date of the operation, New Year's Eve, was identified as an opportune time because "fireworks will be going off at this time so explosions will be less likely to be noticed as immediately as any normal day." The writer of the plan, believed to be CARROLL, emphasized that "absolutely no mistakes can be made." The plans outlined the use of "BlacBloc"⁴ overtop of a layer of "grey/casual bloc" over top of normal street clothes, and noted to keep hair very tightly concealed and to wear gloves for the purpose of avoidance of leaving behind DNA. The plan further instructed that participants should leave their personal devices at home and to make sure the devices were set up to stream a long movie during the time of the attacks, to craft an alibi or "plausible deniability" by having it appear as though the actor was actively using their devices.

10. The plans discuss pre-operational surveillance of targets, identification of "debloc" or de-clothing locations, and not leaving "anything other than the ieds behind," as they could not "risk any evidence tracing back to us." The plans also noted the benefit of placing a small pebble in a shoe to alter natural gait to obfuscate their identification. Instructions on how to purchase materials to construct a pipe bomb suggested using cash only, purchasing in small quantities in order to avoid suspicion, and splitting purchases amongst a team rather than individually.

11. In addition to the plan of action and operational security tactics, detailed instructions were provided on the components required to build a pipe bomb, as well

⁴ BlacBloc refers to a tactic whereby protestors wear black and concealing clothing like masks to protect their identity and project a sense of unity.

as how to create homemade gun powder. The details identified a step-by-step method of crafting the pipe bombs, the source ingredients and ratio of source ingredients of gun powder, the tools necessary to effectively produce gun powder, and general safety tips for the production of the explosives. Based on information from FBI bomb technicians, I understand that the bomb-making instructions, if followed, would likely create an operational explosive device.

12. Based on information from the CHS, PAGE stated that they did not bring any electronic devices, and mentioned having a rich friend that could hopefully provide funding for their direct actions.

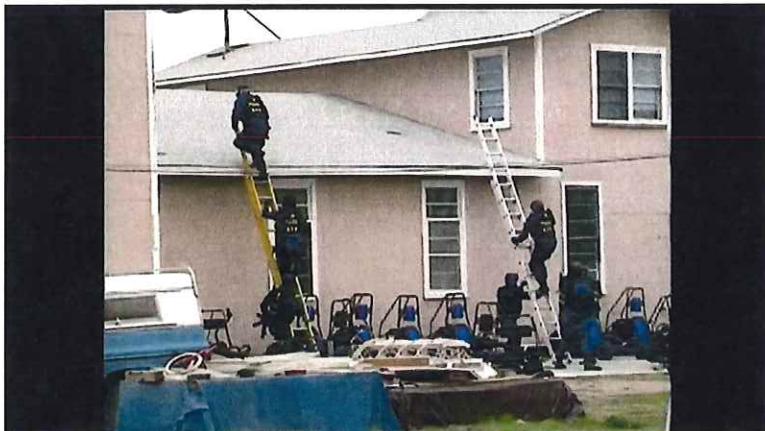
13. Your affiant believes **LEGNON** is a member of the group chat to be, operating under the alias/username of "Darkwitch." Your affiant is aware that **LEGNON** has prior military experience.

14. On December 4, 2025, "Kateri TheWitch" shared a post on Facebook of what appears to Border Patrol Agents conducting an arrest of an individual on a



rooftop. In this shared post, "Kateri TheWitch" states "Shit time to recreate Waco tx with these fuckers. Fuck ice".

15. The following is an image for comparison from the 1993 standoff that took place in Waco, Texas known as the "Waco Massacre" where Alcohol, Tobacco, and Firearms (ATF) agents were in a standoff with a religious sect known as the Branch Davidians.



16. The Davidians were alerted to the impending raid by a local postman, who was also a cult member. The heavily armed, cult members were waiting in ambush as the agents unloaded from their vehicles. David Koresh, the leader of The Davidians was outside on the porch, as the agents approached telling him they had a search warrant and instructing him to "get down," he retreated inside the house. Gunfire burst through the door, as the agents approached, one agent was wounded.

17. As a result of the 2 and 1/2 hour long gunfight, four ATF agents were killed; 20 ATF agents wounded from gunshots or shrapnel and eight agents suffered other injuries. A cease-fire followed and Koresh released 24 members (mostly children, but none of his own) from the compound. A 51-day stand-off ended when the

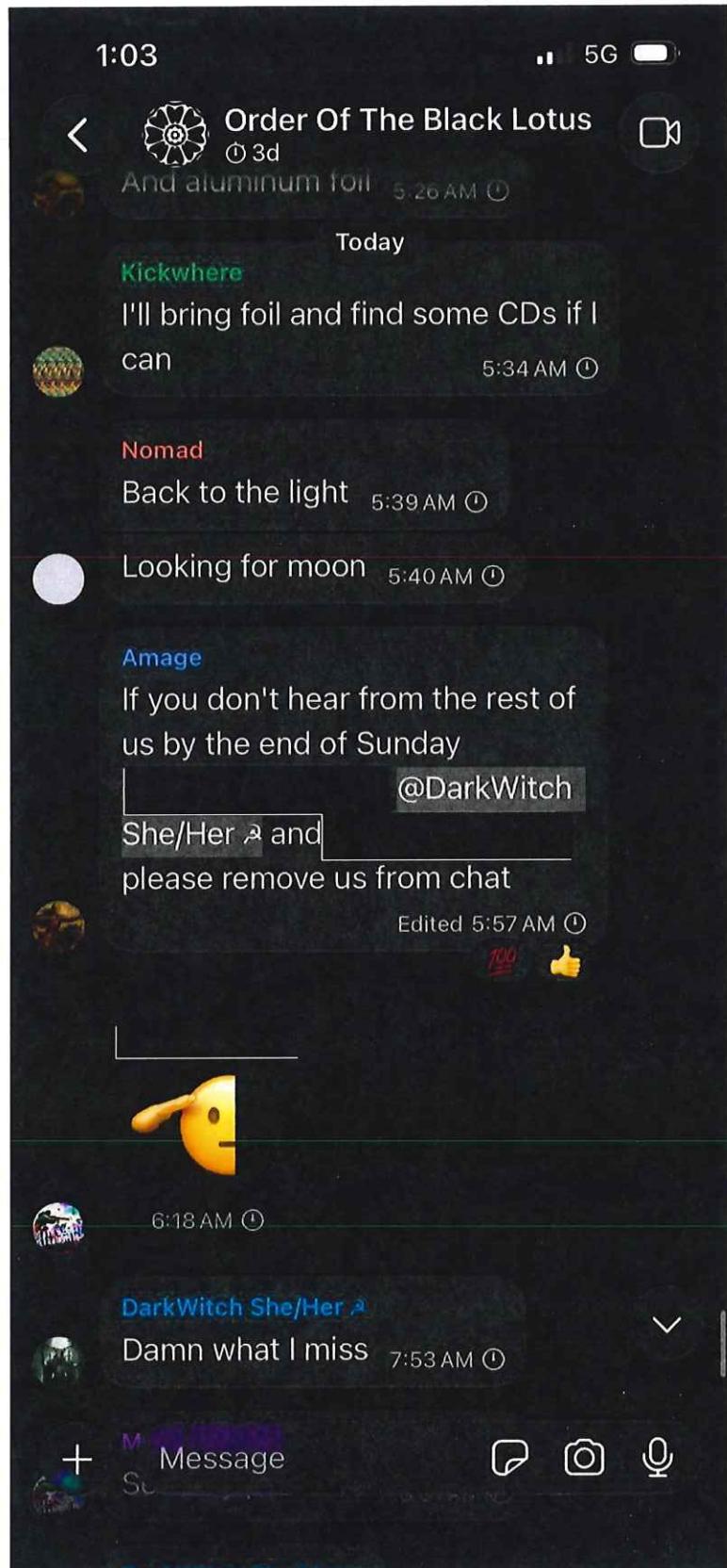
Davidian Compound erupted in fire(s) set by cult members, as law enforcement attempted to force them out by introducing tear gas into the building on April 19. The fire destroyed the compound, and more than 70 residents were killed, many from gunshot wounds apparently inflicted by fellow cult members. Nine cult members escaped the fire and were arrested, while eight of those members were later convicted in federal court on various firearms and/or other charges; and all were sentenced to various lengths of imprisonment.

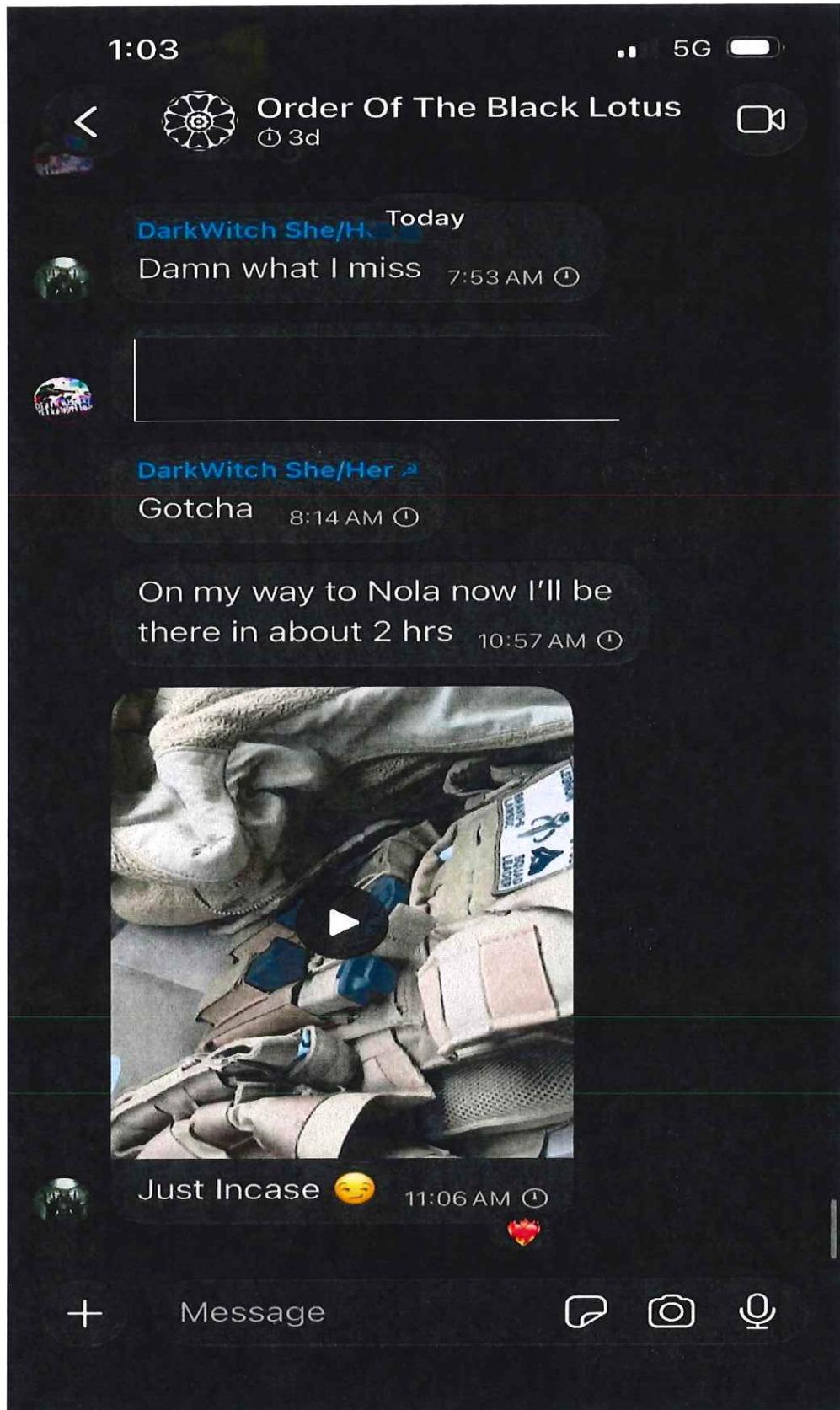
18. Additionally, as widely reported in the news, ICE officials have recently been operating in the New Orleans, Louisiana area of operations.

19. Given the nature of **LEGNON**'s post and the historical context related to the events that transpired in Waco, Texas, it is a reasonable inference to draw that **LEGNON**, when making the post "Shit time to recreate Waco tx with these fuckers. Fuck ice", intended to convey a threat through interstate communications.

20. On December 12, 2025, **LEGNON**, who was under surveillance by the FBI due to his affiliation individuals plotting the Los Angeles bombing plot, was seen leaving his residence at 5506 Leona Drive, Apartment 11 in New Iberia, Louisiana ("Subject Residence"). Agents viewed **LEGNON** load what appeared to be assault rifle and body armor into the Subject Vehicle at approximately 12:30 p.m. on that same date.

21. Messages from the Signal group chat "Order of the Black Lotus" below were posted on December 12, 2025. Agents believe "DarkWitch She/Her" to be **LEGNON**:





22. The following image was taken from the Turtle Island Liberation Front Instagram page:



23. It is your Affiant's belief that **LEGNON** intended to travel to New Orleans to carry out an attack by means of weapons shown in the picture above.

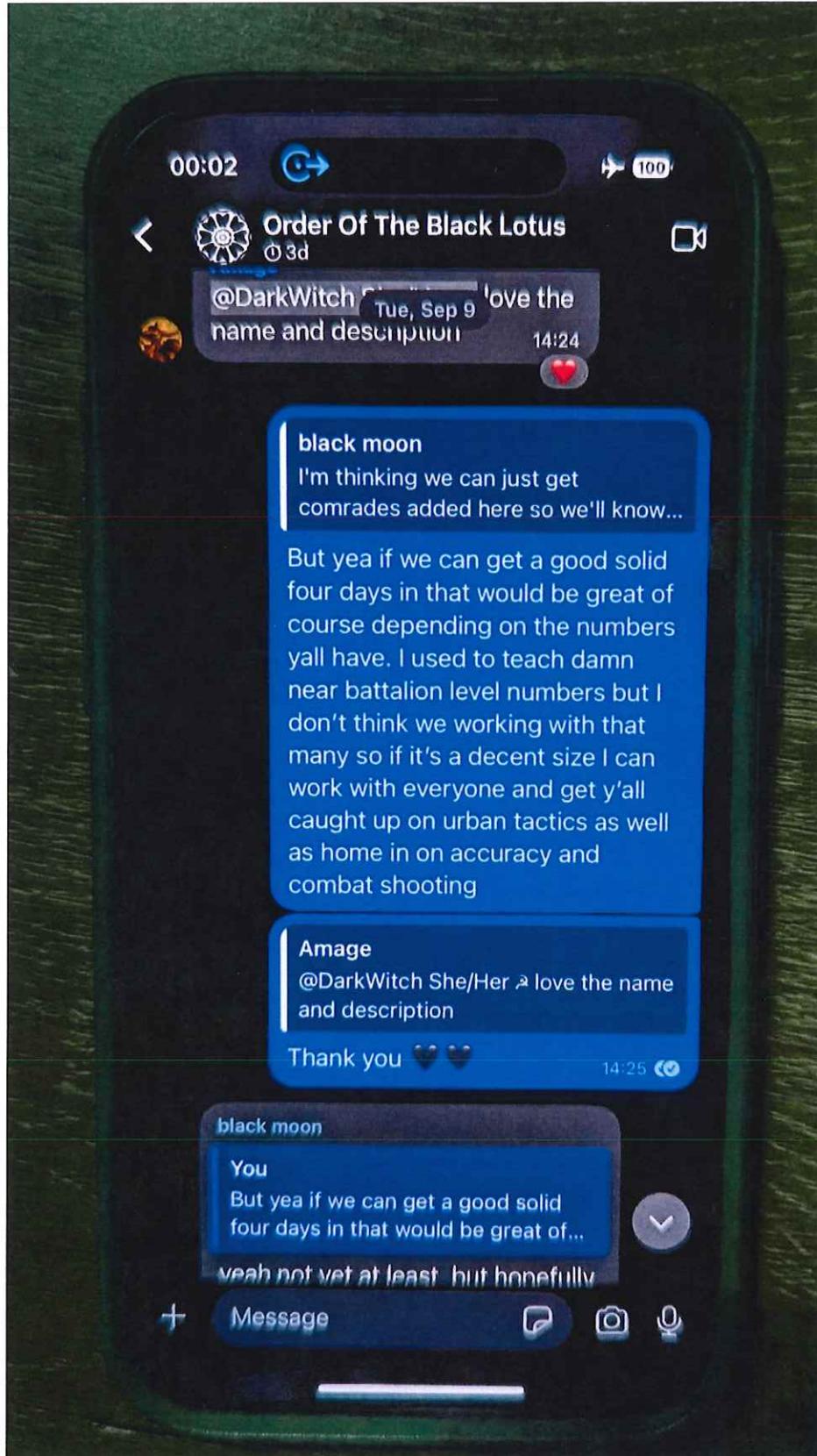
24. Your Affiant would also note that **LEGNON** was previously a member of the Marines with training in combat.

25. On December 12, 2025, your Affiant along with other members of the FBI executed a federal search warrant on **LEGNON**'s residence. In the residence,

agents found sniper training manuals, SWAT training manuals, assault rifles, and multiple rounds of ammunition.

26. Also on December 12, 2025, agents also executed a federal search warrant on his vehicle. **LEGNON** was stopped on Highway 90 eastbound towards New Orleans, Louisiana. Similar to the items in the picture posted by “Dark Witch” in the Signal group chat, **LEGNON** had one assault rifle, one pistol, one gas canister, and body armor in his vehicle.

27. On that same date, agents were able to view **LEGNON**’s cellphone pursuant to a federal search warrant. In a September 9, 2025 chat, **LEGNON** posted the following message in the “Order of the Black Lotus” group chat:



28. Your Affiant is aware that LEGNON has a military background and would have undergone combat training.

29. Further, it is your Affiant's belief that individuals associated with the Los Angeles bombing plot were arrested pursuant to probable cause in the Central District of California on December 12, 2025. Your affiant believes these individuals intended to acquire explosives made by the group.

CONCLUSION

30. Based upon the facts set forth above, your affiant believes that probable cause exists to show that **MICAH JAMES LEGNON, aka "Kateri", aka "Black Witch"** violated Title 18, United States Code, Section 875(c) (Threats in Interstate Commerce).

31. The United States further requests that the Court order that this complaint, warrant and any resulting order be sealed until further order of the Court. As explained above, these documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation, result in destruction of evidence or allow the target of the investigation to flee.

32. I declare that the information provided above is true and correct to the best of my knowledge and belief.

Respectfully submitted,



Paul Sellers
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before the Court this 18th day of December 2025.



DAVID J. AYO
UNITED STATES MAGISTRATE JUDGE