

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:24-CR-6-D-KS

UNITED STATES OF AMERICA     )  
                                          )  
                          v.            )     I N D I C T M E N T  
                                          )  
KEVIN EDRAL DOUGLAS         )

The Grand Jury charges:

**COUNT ONE**

On or about August 23, 2023, in the Eastern District of North Carolina, the defendant, KEVIN EDRAL DOUGLAS, did knowingly and willfully make a threat to kill former First Lady Michelle Obama, a member of the immediate family of Barack Obama, a former President of the United States, by communicating a threat to kill former First Lady Michelle Obama via the White House’s webpage, in violation of Title 18, United States Code, Section 879(a)(1).

**COUNT TWO**

On or about September 19, 2023, in the Eastern District of North Carolina, the defendant, KEVIN EDRAL DOUGLAS, did knowingly and willfully make a threat to take the life of Speaker of the House of Representatives Kevin McCarthy, the officer next in the order of succession to the office of President of the United States, or the Vice President-elect, specifically by communicating a threat to kill Speaker Kevin McCarthy via the White House’s webpage, in violation of Title 18, United States Code, Section 871(a).

**COUNT THREE**

On or about September 21, 2023, in the Eastern District of North Carolina, the defendant, KEVIN EDRAL DOUGLAS, did knowingly and willfully make a threat to take the life of Vice President Kamala Harris, specifically by communicating a threat to kill Vice President Kamala Harris via the White House's webpage, in violation of Title 18, United States Code, Section 871(a).

**COUNT FOUR**

On or about October 22, 2023, in the Eastern District of North Carolina, the defendant, KEVIN EDRAL DOUGLAS, did knowingly and willfully make a threat to take the life of President Joseph Biden, specifically by communicating a threat to kill President Joseph Biden via the White House's webpage, in violation of Title 18, United States Code, Section 871(a).

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COUNT FIVE

On or about October 31, 2023, in the Eastern District of North Carolina, the defendant, KEVIN EDRAL DOUGLAS, knowingly and willfully did transmit in interstate and foreign commerce from the State of North Carolina, to the State of Virginia, a communication, to wit, an online cybertip reporting service to the National Center for Missing and Exploited Children, and the communication contained a threat to kidnap and injure certain persons, specifically that he was going to kill children at his hotel and an adjacent business in Cary, North Carolina, in violation of Title 18, United States Code, Section 875(c).

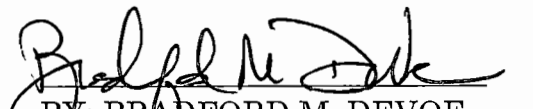
**REDACTED VERSION**

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

30 Jan 2024  
DATE

MICHAEL F. EASLEY, JR.  
United States Attorney

  
BY: GABRIEL J. DIAZ  
Assistant United States Attorney

  
BY: BRADFORD M. DEVOE  
Assistant United States Attorney