

FILED
Clerk
District Court

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

DEC 19 2024

for the

District of the Northern Mariana Islands

for the Northern Mariana Islands
By af
(Deputy Clerk)

United States of America

v.

Case No. CR - 24 - 00023

EDWARD GENE W. RICHARDS,

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 November 10-17, 2024 in the county of --- in the --- District of the Northern Mariana Islands, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 115(a)(1)(B)	Count One: Threatening a Federal Judge
18 U.S.C. §§ 875(c)	Count Two: Transmitting a Threatening Interstate Communication

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Jason Oakley in Support of Criminal Complaint.

Continued on the attached sheet.

Jason R. Oakley
Complainant's signature

Jason Oakley, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 12/19/2024

Teresa K. Kim-Tenorio
Judge's signature

City and state: Saipan, CNMI

Teresa K. Kim-Tenorio, Designate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Jason R. Oakley, after being duly sworn, deposes and states as follows:

1. I submit this Affidavit in support of the foregoing Criminal Complaint charging Edward Gene W. Richards (“RICHARDS”), with Threatening to Assault or Murder a United States Judge, in violation of Title 18 U.S.C § 115(a)(1)(B), and Transmitting a Threat to Kidnap Any Person or Threatening to Injure the Person of Another in Interstate or Foreign Commerce, in violation of Title 18 U.S.C § 875(c).

2. The facts in this Affidavit come from my personal observations, my training, my experience, and information obtained from other law enforcement officers and agents and from other witnesses. This Affidavit is intended to show only that probable cause exists for the charge(s) in the Criminal Complaint and does not set forth all of my knowledge or all of the information known to the government about this matter.

AFFIANT TRAINING, EXPERIENCE AND KNOWLEDGE

3. I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code.

4. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since 2002. In that capacity, I have conducted numerous investigations into violations of federal criminal law to include domestic terrorism and threats communicated in interstate commerce. Prior to serving with the FBI, I served for

nine years with the Texas Department of Public Safety as both a State Trooper and Sergeant Investigator.

5. During my time in law enforcement, I have become knowledgeable about the enforcement of State and Federal laws pertaining to terroristic threats and the means of transmitting threats via interstate commerce by use of wireless electronic communication.

PROBABLE CAUSE

6. The United States, including the FBI and United States Marshal's Service ("USMS"), is conducting a criminal investigation regarding possible violations of 18 U.S.C § 115(a)(1)(B) and 18 U.S.C § 875(c).

7. On November 14, 2024, Special Agent Jason R. Oakley ("SA Oakley") of the FBI was notified by Deputy United States Marshal Samuel Sosa ("DUSM Sosa") of a series of harassing and threatening emails sent to United States Probation for the District of the Northern Mariana Islands. The emails were sent to the publicly available inbox at GUPml_NMI. Over 1,000 emails were received from doe461428@gmail.com between November 10 and November 17, 2024. A review of the emails revealed threats to government officials, threats to bomb Saipan, and a threat to kill United States District Judge Ramona Manglona.

8. On November 10, 2024, at 2:40 a.m. ChST, doe461428@gmail.com sent the following email to GUPml_NMI: "Okay the Federal Court House can shut

down TSA Officer Edward Duane Quitugua Richards or let's disappear him." On November 10, 2024, at 9:27 p.m. ChST, doe461428@gmail.com sent the following email to GUPml_NMI: "Than its we know I know right right I just want to kill judge Ramona." On November 11, 2024, at 2:03 p.m. ChST, doe461428@gmail.com sent the following email to GUPml_NMI: "She better not go from there or I will start bombing up saipan."

9. On November 14, 2024, at 5:00 p.m. ChST, SA Oakley requested subscriber information from Google LLC via an emergency disclosure request. At 5:15 p.m. ChST on the same date Google LLC provided requested information indicating that doe461428@gmail.com was using a BLU Android phone Model G71L, Android ID 3801465288727833168, IMEI(s) 359529380156187, 359529380106182, Serial G0710WW:2010308022805612 ("Suspect Device Identifiers") utilizing internet service provider ("ISP") IT&E.

10. On November 14, 2024, at 6:47 p.m. ChST, SA Oakley requested subscriber information via emergency disclosure request for the Suspect Device Identifiers. On November 15, 2024, at 10:13 a.m. ChST, IT&E provided the following information regarding the Suspect Device Identifiers: Call Number 670-789-0488 with IMSI 310110670789981, a pre-paid wireless phone with no identified subscriber.

11. On November 18, 2024, at 11:16 a.m. ChST, SA Oakley was notified

by DUSM Sosa that an additional email, scarballon@gmail.com, was sending harassing emails to GUPml_NMI with a writing style similar to that of doe461428@gmail.com with multiple references to United States District Judge Ramona Manglona. SA Oakley requested subscriber information from Google LLC via emergency disclosure to request subscriber information for scarballon@gmail.com. Subscriber information provided by Google LLC for scarballon@gmail.com was identical to the Suspect Device Identifiers for doe461428@gmail.com.

12. A review of emails sent by doe461428@gmail.com determined that on November 9, 2024, at 8:04 p.m. ChST, an email was sent including the line “This is Edward Gene Worswick Richards.”

13. DUSM Sosa verified the Transportation Safety Administration (“TSA”) Saipan International Airport (“SIA”) Office has an employee named Edward Duane Richards that was referenced in the threat dated November 10, 2024. On November 19, 2024, DUSM Sosa interviewed TSA Officer Richards at SIA. Officer Richards indicated that RICHARDS is his (TSA Officer Richards’s) nephew and Worswick is RICHARDS’s mother’s maiden name. TSA Officer Richards told the investigating officers he believes RICHARDS lives with his father, Florencio Richards, and that RICHARDS suffers from mental health issues.

14. In November of 2020, RICHARDS was arrested and charged with

Robbery in the Superior Court for the Commonwealth of the Northern Mariana Islands. According to the Information filed in Criminal Case No. 20-0184E, RICHARDS “unlawfully took property [] by use or threatened use of immediate force or violence” and “used a dangerous weapon, namely, a machete and/or knife, to obtain the property, to wit: US Currency and cigarettes.” On January 5, 2022, the case was dismissed after RICHARDS was found to be incompetent.

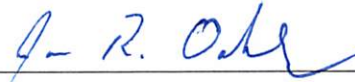
15. On December 19, 2024, your Affiant conducted a review of the larger files that were contained in the emails sent to United States Probation. On November 11, 2024, at 6:18 a.m. ChST, an email was sent with an attachment of a video file VID20241112_001710.mp4 which is a “selfie” video of RICHARDS sitting on a bed wearing a grey t-shirt. On November 10, 2024, at 10:46 p.m. ChST, an email was sent with an attachment of a video file VID20241111_164602.mp4 which is a “selfie” video of RICHARDS sitting at a picnic table with an unidentified woman wearing a blue t-shirt and white headphones on his head.

CONCLUSION

16. Based on the foregoing, I have probable cause to believe that RICHARDS has committed the offenses Threatening to Assault or Murder a United States Judge, in violation of Title 18 U.S.C § 115(a)(1)(B), and Transmitting a Threat to Kidnap Any Person or Threatening to Injure the Person of Another in Interstate or Foreign Commerce, in violation of Title 18 U.S.C § 875(c).

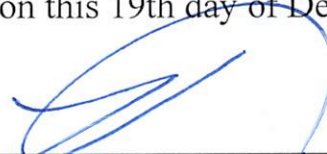
17. I have shown this affidavit and the accompanying complaint to Assistant United States Attorney Garth Backe, and he informs me that the complaint and affidavit are in proper form.

Respectfully submitted,



Jason R. Oakley
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO before me on this 19th day of December 2024.



Teresa K. Kim-Tenorio
Designate Judge