

EDOK Criminal Complaint (Revised 6/13)

United States District Court

EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RANDALL FOLTYNIEWICZ,

Defendant.

CRIMINAL COMPLAINT

Case No. 24-MJ-428-GLJ


I, Tanner Stindtman, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

Between in or about March of 2024 and December 17, 2024, in the Eastern District of Oklahoma, **RANDALL FOLTYNIEWICZ**, committed the crimes of **Mailing Threatening Communications and Stalking**, in violation of Title 18, United States Code, Sections 876 and 2261A(1)(B).

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

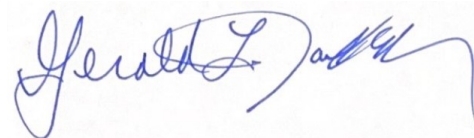
(See attached Affidavit of Special Agent Tanner Stindtman, which is attached hereto and made a part hereof by reference.)

Continued on the attached sheet.


Tanner Stindtman, Special Agent
Federal Bureau of Investigation

Sworn to on December 17, 2024.

GERALD L. JACKSON
UNITED STATES MAGISTRATE JUDGE
Hon. Gerald L. Jackson


Signature of Judicial Officer



AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Tanner Stindtman, a Special Agent (“SA”) with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”). I am currently assigned to the FBI Rapid City Resident Agency in South Dakota. I have held this position since January of 2021. I attended a 20-week New Agent Training Academy in Quantico, Virginia at the start of my employment with the FBI. Since that time, I have completed numerous in-service trainings conducted by the FBI in relation to various aspects of criminal investigations. Prior to the FBI, I was a Special Agent with the South Dakota Division of Criminal Investigation for approximately three-and-a-half years. As a Special Agent for the South Dakota Division of Criminal Investigation I completed a 520-hour Law Enforcement Training Basic Certification Course. Over the course of my employment with the Division of Criminal Investigation, I completed multiple in-service trainings in relation to various aspects of criminal investigations. I am an investigative officer, or law enforcement officer, of the United States of America within the meaning of 18 U.S.C. § 2510(7) and Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is an officer of the United States who is empowered by law to request search warrants and to conduct investigations of, and make arrests for, offenses enumerated in Title 18. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 876 and 2261A(1)(B).

2. I am familiar with the facts and circumstances of this investigation. The facts set forth in this affidavit are based on my personal observations, knowledge obtained from other law enforcement officers, my review of documents related to this investigation, conversations with

others who have personal knowledge of the events and circumstances described herein, and a review of open-source information including information available on the Internet. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for an arrest warrant, it does not set forth each and every fact I or others have learned during the course of this investigation.

PROBABLE CAUSE

3. As will be shown below, there is probable cause to believe that Randall Foltyniewicz committed violations of Title 18 U.S.C. §§ 876 (Mailing Threatening Communications) and 2261A(1)(B)(Stalking).

4. In May of 2024, the Oglala Sioux Tribe Department of Public Safety (“OSTDPS”) and the FBI Rapid City Resident Agency initiated an investigation into threatening mail communications sent to enrolled members of the Oglala Sioux Tribe through the mail.

5. In May of 2024, Minor Victim 1 (“MV1”) and her guardians reported to OSTDPS that MV1 received an Amazon package. The package, addressed to MV1, using her name, was sent to the Pine Ridge High School. MVI is currently a student at Pine Ridge High School. The sender was not identified. A photograph of this package is included below.



6. Inside the package were two T-shirts. One of these shirts depicts two skeletons kissing and the second depicts a heart with a chainsaw, ax, brass knuckles, and other weapons depicted in the outline of the heart. Prior to the interview, MV1's family provided photographs to OSTDPS of the items received. This package had UPS Ground Tracking Number 1ZA8G7760310723260.



7. MV1 received an additional package containing a black t-shirt with a depiction of a woman being choked and gagged. This t-shirt is depicted in the photo below.



8. After MV1's guardians filed the report with OSTPS, she received another package with a t-shirt that depicted a pig wearing a police hat and holding a doughnut. This t-shirt is depicted below.



9. In July 2024, OSTDPS conducted an interview with Minor Victim 2 ("MV2") and her guardian. During this interview, MV2 disclosed she started receiving packages in the mail in January 2024. The first package contained a black shirt with a heart and something going through it. Around June 2024, MV2 started receiving packages addresses to MV2 at the Pine Ridge School, where she was attending school. MV2's guardian, noticed other students were receiving packages also.

10. MV2's family attempted to contact Amazon to identify the sender's information, but Amazon informed the family that the packages were sent as "gifts," and the sender information was not available.

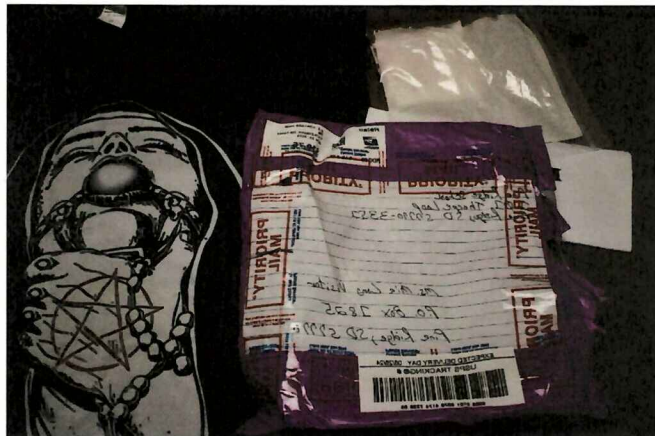
11. The packages addressed to MV2 were provided to OSTDPS. Investigators reviewed the contents of the packages. In one package were two green packs of "PUR" gum in a brown paper package from Amazon Fulfillment Services, 14601 Grant Street, Thornton, CO

80023- 6622, addressed to MV2 at P.O. Box 1825, Pine Ridge, SD, 57770-1825 with USPS tracking # 92748909838526581068003173. This P.O. Box is MV2's mailing address.

12. The second package to MV2 was in the same brown paper packaging. It contained a bottle of 120-count "Eclipse" spearmint gum and three white slips of paper from Amazon Fulfillment Services, 605 S Bullard Ave, Goodyear, AZ 85338 addressed to MV2 at P.O. Box 1825, Pine Ridge, SD, 57770-1825 with USPS tracking # 9274 8965081155581014246571. On one slip of paper was a note that read "You look better in person. From Call me whatever you."

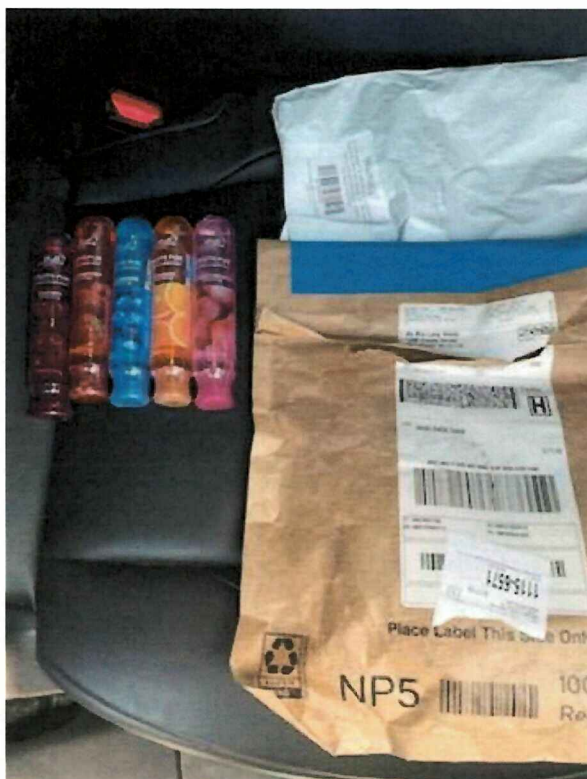
13. The third package to MV2 was a purple package with a hand-written packaging slip. The return address was Pine Ridge School, 101 Thorpe Loop, Pine Ridge, SD, 57770-3351, and was addressed to MV2, P.O. Box 1825, Pine Ridge, SD, 57770-1825 with USPS tracking # 9505516188784174732665. The postage stamp was paid for in Tahlequah, OK, 74464, on June 22, 2024. The package contained a typed message "Make sure MV2 receives this package or you will be tortured." There were what appeared to be napkins with red writing that read "Air Dry" and "Hand Wash Only."

14. In the third package to MV2 was a black shirt depicting a nun with a ball gag in her mouth and a hand choking her, with a five-pointed star, and a rosary wrapped around the hand. This t-shirt, as well as the packaging it arrived in, is depicted below.



15. Another package to MV2 arrived in a Walmart box, and the return address was Walmart, 6721 W. 350 North Greenfield, IN, 46140, PO: 108918121533250, FedEx Tracking # 7371 6127 6078. This package was addressed to MV2 on Coyote Street, Pine Ridge, SD, 57770. This address is MV2's physical address. This package was shipped on June 29, 2024. It contained three packs of baby wipes, three pack of Chapstick, bundles of sage, and a large green pack of mint-flavored Life Savers.

16. Following the interview with OSTDPS, MV2's guardian informed law enforcement they received another package from Walmart addressed to MV2. OSTDPS Criminal Investigator Alec Morgan reviewed the package. This Walmart package had Fed Ex tracking # 400804365460. Inside the package were five bottles of Fruits Fun Edible Lubrication, which appear to be sexual lubricants, in various flavors. The lubricants and the packaging are depicted below.



17. In July of 2024, law enforcement conducted an interview with Minor Victim 3 (MV3) and her guardians. During the course of this interview, MV3 disclosed she received a package containing a black shirt with a nun on it, along with a letter and napkins with washing instructions. MV3 stated when she received these items, it scared the “shit” out of her, made her heart drop, and her body got chills.

18. In July of 2024, a subpoena was served on Walmart for information related to the package described in Paragraph 16, *supra.*, with FedEx Tracking # 7371 6127 6078. Your affiant reviewed information provided through the return, which identified the sender of this package to be Randall Foltyniewicz, phone number (206) 294-0211, Account ID b4bbca17-e4a3-40dd-ba4f-b44f81f6d1bd, email address Randyfolty@gmail.com, and billing address 2021 N Alora Ave, Tahlequah, Oklahoma, 74464.

19. An additional subpoena was served on Walmart for all transactions completed by Walmart Account ID b4bbca17-e4a3-40dd-ba4f-b44f81f6d1bd. Your affiant reviewed information provided by Walmart in response to this subpoena and learned all of the above-mentioned Walmart packages sent to MV2 were sent by Walmart Account ID b4bbca17-e4a3-40dd-ba4f-b44f81f6d1bd.

20. The subpoena returns from Walmart showed that on June 2, 2024, Randall Foltyniewicz, Billing phone number (206) 294-0211, purchased an item named Pentagram Choked Up Nun T-Shirt for the price of \$9.99. On June 11, 2024, the same account purchased two additional Pentagram Choked Up Nun T-Shirts. All three of these items were shipped to 2021 N Alora Ave, Tahlequah, OK 74464.

21. In addition to the Pentagram Choked Up Nun T-Shirts, common household items and groceries are routinely sent to this address.

22. Your affiant conducted an open source search of Walmart.com for the Pentagonram Choked Up Nun T-Shirt, and located the item depicted in the below photo.



23. Also, in July of 2024, a subpoena was served on Amazon for the above-described Amazon packages. During a review of the Amazon subpoena return, your affiant learned the billing name attached to the Amazon packages was Randall Foltyniewicz, with billing address 134 W North St. Apt. 213, Waukesha WI, 53188-7023, customer email randyfolty@gmail.com, billing phone number (206) 294-0211, and a credit card with the name Randall Foltyniewicz.

24. United States Postal Inspector Dan Ullrich conducted a review of the tracking information for USPS tracking # 9505516188784174732665, the package described in Paragraph 13 of this affidavit. During this search, USPS Inspector Ullrich identified that a request for SMS tracking on this parcel was made. The phone number those tracking alerts were to be sent to was 1 (206) 294-0211. That phone number requested SMS tracking information for a number of additional parcels shipped through the USPS system.

25. USPS Inspector Ullrich was able to locate three parcels mailed from Tahlequah, Oklahoma, which were mailed with cash at a retail post office. Each of the three parcels had a handwritten label with similar handwriting, and each listed a return address of a different school within the region it was shipped to, despite being shipped from Oklahoma.

26. In addition, USPS Inspector Ullrich determined the phone number 1 (206) 294-0211 had requested SMS tracking updates for three of the identified packages.

a. The package with USPS Tracking # / label 9505516188764176449860 listed a return/sender address of Lakota Tech HS, 14 New Wolf Creek Road, Pine Ridge, SD 57770.

b. The package with USPS Tracking # / label 9505516188784174732665 listed a return/sender address of Pine Ridge School with illegible numbers off Thorpe Loop, Pine Ridge, SD 57770.

c. The package with USPS Tracking # / label 9505516188784174732689 listed a return/sender address of Red Cloud Indian School with illegible numbers off Mission Drive, Pine Ridge, SD 57770.

27. In July of 2024, a subpoena was served on T-Mobile for the phone number receiving tracking updates for each of these packages, 1 (206) 294-0211. T-Mobile sent the subpoena return to the FBI on July 24, 2024. These records show that the subscriber is Randall Foltyniewicz, with an address of 134 W North St Apt 213, Waukesha, WI 53188-7023.

28. In August of 2024, Law Enforcement conducted an interview with Minor Victim 4 (“MV4”) and her guardian. During this interview, MV4 and her guardian disclosed they received a package that contained a t-shirt with a picture on the front of a stack of buffalo skulls with a pioneer standing on top. On the back of the shirt was lettering that said “Oyate Luta.” There was a note with the t-shirt that said “this will be given to MV4 or you will be tortured.” The return address was from Tahlequah, Oklahoma.

29. Your affiant believes, based on the information received through the investigation, that all the above-described packages were sent by the same individual.

30. On November 8, 2024, a search warrant was granted by the District Court of South Dakota, Western Division, for the G-Mail account associated with the email Randyfolty@gmail.com.

31. On November 15, 2024, Google provided a return. During a review of the return, the listed device is Device Type: LG-H918, MEID: 35222708282713 IMEI: 352227082827133, Account Name: Randall Foltyniewicz, Google Account: 972708645613, Recovery Phone Number: (206) 294-0211. Your affiant also located multiple google searches for physical addresses within the exterior boundaries of the Pine Ridge Indian Reservation¹, and hotels located in Rapid City, South Dakota. The dates of these searches dated back, and up to, October of 2024.

32. Your affiant also located within the Calendar section, a number of calendar entries related to middle and high schools that are located within South Dakota. A few of these events are highlighted below:

| | |
|---|--|
| October 28, 2024 | PRHS at Edgement (VB) |
| October 26, 2024 | Crow Creek at LT (VB) |
| September 24, 2024 @ 10:30 – 11:30 P.M. | Pine Ridge VB |
| August 31, 2024 @ 8:00 – 9:00 P.M. | Flandreau VS Lower Brule – Youtube lowerbrulelive |
| August 29, 2024 @ 8:00 P.M. – 9:00 P.M. | PR at RC |
| August 22, 2024 @ 1:00 P.M. – 2:00 P.M. | Sack o'shit delivered ² |
| August 19, 2024 | Lakota Tech/Pine Ridge – First Day |
| August 12, 2024 | Red Cloud First Day |
| July 1, 2024 | Crazy Horse Yearbook ship yet? |
| June 18, 2024 | Think about dm'ing c [REDACTED] for her mailing address |
| June 2, 2024 | Scheduled Redelivery of Pine Ridge Package |
| May 31, 2024 | Send b [REDACTED] 2 of 2 pictures |

¹ The Pine Ridge Indian Reservation primarily sits along the southern border of South Dakota, although a small portion of the reservation extends into Nebraska.

² On this date, August 22, 2024, Minor Victim 2 received a package containing makeup, toilet paper, and fake feces.

| | |
|----------------|--|
| May 31, 2024 | Enter the "our secret" fb post |
| May 29, 2024 | Send b [REDACTED] 1 of 2 pictures |
| May 28, 2024 | Enter the "12 year old" fb post |
| May 26, 2024 | Enter teenage dream post |
| May 22, 2024 | MV2 Shirt Delivered. (5 th one) with purple-ish Lipstick |
| May 22, 2024 | Pine Ridge "elementary" middle school ceremony of sorts. |
| May 16, 2024 | Pine rodge 8 th grade banquet. (The last of the gifts have been released.) |
| May 16, 2024 | Test for reaction??? |
| May 15, 2024 | Check the deliveries. |
| May 15, 2024 | MV2 Massage oil delivery |
| May 13, 2024 | MV2 Pink/purple lipstick Delivered |
| May 8, 2024 | MV2 Shirt Delivered. (4 nd one) sexual |
| May 7, 2024 | T [REDACTED]'s lipstick should be delivered today. |
| May 6, 2024 | Go dark with her by today. If not sooner. |
| May 4, 2024 | Haskell Graduation Wacipi – Twinns are out. |
| May 2, 2024 | Need to find out when T [REDACTED]'s shirt will be delivered. |
| April 26, 2024 | MV2 Shirt Delivered. (3 rd one) |
| April 23, 2024 | MV1's shirt arriving. |
| April 19, 2024 | Send B [REDACTED] picture of her with red/black hair. |
| April 17, 2024 | MV2 Shirt Delivered. (2 nd one) |
| April 17, 2024 | Order the poo stick for T. Either today or tomorrow. Delivery after prom. |
| April 15, 2024 | Check status of flandreau shipments |
| April 15, 2024 | MV4 received 2 nd tshirt sans lipstick today |
| April 12, 2024 | UPS will attempt to redeliver the package. bl should probably enter in a new order shipping via USPS. Follow up with B [REDACTED]. Say hello. See if she likes the shirt I sent her. |
| April 3, 2024 | T [REDACTED]'s shirt showed up. |
| March 28, 2024 | 2 nd of 3 rounds of vitamins to arrive. |
| March 20, 2024 | M [REDACTED] S [REDACTED] = Zombie shirt/2 📦 delivered |
| March 14, 2024 | Pine ridge boys basketball state tournament |

33. Based on my training and experience, I know "fb" to be an acronym for the social media website Facebook. With this knowledge the defendant noting that he "entered" the posts

“our secret”, “teenage dream”, and “12 year old” on Facebook indicates that the defendant joined Facebook groups with the names “our secret”, “teenage dream”, and “12 year old.” Facebook groups allow users to join in chats with other Facebook users that have similar interests with them. In my training and experience, I have learned and observed that Facebook groups are used as forums for like-minded individuals to receive and distribute images of minors engaged in sexually explicit conduct. The names of the groups that the defendant joined are consistent with names of groups that I have observed being used for such purposes in my training and experience.

34. While reviewing the Email portion of the return, your affiant located the following emails:

- a. An email from November 1, 2024, confirming that the defendant was now following MV2 on MaxPreps.³
- b. An email from March 30, 2024, received from the email address notifications@discord.com. The title line for this email read Update to Discords Policy.⁴
- c. Multiple Amazon receipts dating back to December 30, 2023, corroborating that the defendant ordered the items received by the minor victims in this case.

35. There was also additional web history relevant to this affidavit. Namely, on October 17, 2024, the defendant searched details of MV3’s high school volleyball career on Max Preps.

³ An open-source search indicates that MaxPreps is an online high school sports website and phone application that provides information about high school sports in the United States, including schedules, scores, rankings, stats, and news.

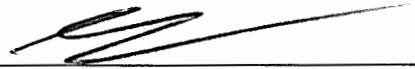
⁴ Discord is a free communication application that allows users to create communities and groups for a variety of purposes, allowing them to message within the groups, share photos and videos within the groups, and engage in direct messages with other users. Based on my training and experience, I know Discord to be an application used by those with a shared interest in the sexual exploitation of minors to exchange and receive images of minors engaged in sexually explicit conduct.

On October 11, 2024, the defendant searched for MV3's Pinterest profile.⁵

CONCLUSION

36. Based on the information set forth in this affidavit, I submit there is probable cause to believe that Randall Foltyniewicz, D.O.B. XX/XX/1979, has violated Title 18 U.S.C. §§ 876 (Mailing Threatening Communications) and 2261A(1)(B)(Stalking).

Respectfully Submitted,



Tanner Stindtman, Special Agent
Federal Bureau of Investigation

Sworn to December 17th, 2024.



UNITED STATES MAGISTRATE JUDGE

⁵ Pinterest is described as a visual discovery engine where users can browse and collect images, known as "pins," across various categories like fashion, food, home decor, and DIY projects, organizing them into themed boards to easily access ideas and inspiration they find interesting. Users can follow other Pinterest users and view "pins" that they have saved.