
UNITED STATES DISTRICT COURT

District of Kansas

(Wichita Docket)

FILED
U.S. District Court
District of Kansas

JAN 23 2020

Clerk, U.S. District Court
By *[Signature]* Deputy Clerk

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. *20-6008-01-GEB*

AARON MCDOWELL,

Defendant.

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

COUNT 1

On or about January 21, 2020, in the District of Kansas, the defendant,

AARON MCDOWELL,

did knowingly and willingly make a threat against the President of the United States, to wit: posted on his Facebook page, "I'm going to kill Trump in the white house tomorrow at 7 PM."

In violation of Title 18, United States Code, §§ 871.

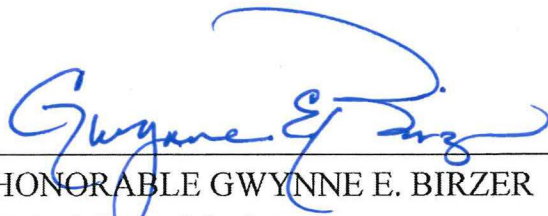
I further state that I am a Special Agent with the U.S. Secret Service, and that this Complaint is based on the following facts:

SEE ACCOMPANYING AFFIDAVIT, WHICH IS INCORPORATED BY REFERENCE AS THOUGH SET OUT IN FULL HEREIN.



GREG TIANO, SPECIAL AGENT
U.S. Secret Service

Sworn to before me and subscribed in my presence this 23 day of January, 2020,
at Wichita, Kansas.



HONORABLE GWYNNE E. BIRZER
United States Magistrate

AFFIDAVIT

I, Gregory Tiano, have been employed as a Criminal Investigator with the U.S. Secret Service for 22 years. Since late 2009, I have been assigned to the Wichita Office of the U.S. Secret Service. As a Senior Resident Agent, I have been trained to conduct criminal investigation to include but not limited to threats on protectees of the US Secret Service; which includes the President of the United States.

This criminal complaint is based on the following facts which were obtained during a threat investigation, interviews personally/telephonically conducted and/or were related to your Affiant by other duly sworn law enforcement officers based on their interviews and observations:

I submit the following facts:


On 1/21/2020, Aaron MCDOWELL posted on his Facebook page, "I'm going to kill Trump in the white house tomorrow at 7 PM."

Further on 1/21/2020, after, Chloe Smith, a person unknown the affiant, commented on MCDOWELL's original Facebook post, threatening to kill the Trump, "Yo prove it." Aaron MCDOWELL replied to Chloe Smith on Facebook, "You'll see it on the news."

On 1/22/2020, I personally interviewed Aaron MCDOWELL at his residence 2140 E. Crawford #201, Salina, KS. During this interview, Aaron MCDOWELL stated that during a 1/21/2020, telephone conversation about Government conspiracy theories, with his father, William McDowell, Aaron MCDOWELL stated he made the verbal statement to his father, he was going to post on Facebook that he was going to kill the President.

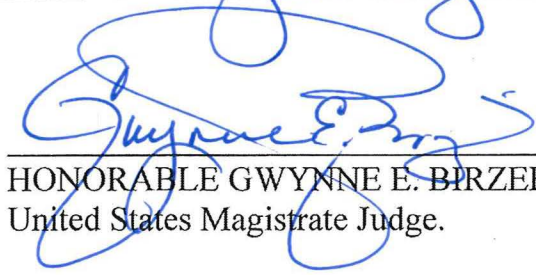
Aaron MCDOWELL stated that he was told by his father not to do it because that was serious and that that he would be visited by the Agents of the government for such a posting. Aaron MCDOWELL stated that after hearing his father's warning, he posted the threat on Facebook using his personal cellular phone.

Knowingly and willingly made a threat against the President of the United States in violation of 18 U.S.C. 871 (Threats against President and successors to the Presidency).



Greg Tiano
Senior Resident Agent, U.S. Secret Service

Subscribed and sworn before me this 23rd day of January 2020



HONORABLE GWYNNE E. BIRZER
United States Magistrate Judge.