

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA**

JOHN ROBINSON, being duly sworn, deposes and says:

1. I am a Special Agent with the United States Secret Service, and have been since December of 1999. As a United States Secret Service Special Agent, I have been involved with numerous criminal investigations involving counterfeit Federal Reserve Notes, credit card fraud, bank fraud, access device fraud, identity theft, wire fraud, threats against the United States Secret Service protectees as well as various other crimes. In my current capacity at the United States Secret Service Charlotte Field Office, I am a member of the Protective Intelligence Squad. In this assignment, I am responsible for investigating matters involving potential threats against United States Secret Service protectees to include threats against the President of the United States. As such, I have investigated numerous threats against United States Secret Service protectees.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, United States Secret Service Protective Intelligence Research Specialists and witnesses. This affidavit is intended to show merely that there is sufficient probable cause in support of a criminal complaint and arrest warrant for **DAVID KYLE REEVES**; therefore, I have not included each and every fact known to me concerning this investigation.

3. Based on my training and experience and the facts as set forth in this affidavit, I submit that there is probable cause to believe that **REEVES** knowingly and willfully made a threat to take the life of and to inflict bodily harm upon the President of the United States in violation of Title 18, United States Code, Section 871 (Threats Against the President of the

United States).

THE INVESTIGATION

4. On January 28, 2021, at approximately 1357 hours, White House Switchboard Operator [REDACTED] White House Communications Agency, notified the United States Secret Service of a caller stating, "I am going to fucking kill you all, Fuck the White House. I am going to chop your heads off." The call originated from telephone number [REDACTED] registered to **REEVES**.

5. On February 1, 2021, at approximately 1505 hours, I called David **REEVES** [REDACTED]. I asked David **REEVES** to speak with me concerning the threat call he made to the White House. David **REEVES** did not want to talk about it. He stated he had free speech and did nothing wrong. He is allowed to say whatever he wants. **REEVES** then ended the conversation.

6. On February 1, 2021, at approximately 1508 hours, David **REEVES** called me and wanted to know about what I would like to talk. I stated I wanted to know if he was going to act on his threat of killing everyone at the White House. **REEVES** stated he would kill everyone. **REEVES** then stated he would kill everyone if he had a car, then a gun, and a security clearance so he could get close enough to kill everyone. **REEVES** stated he is going to continue to call and threaten people. I cannot stop him, my government cannot stop him, and no country in the world can stop him. **REEVES** stated he made a fool of all of us because we could have already arrested him since he has a warrant for his arrest in Hart County, Georgia. I said the warrant was not extraditable but he did have an upcoming court case there. **REEVES** stated he already called the sheriff in Hart County and told him to fuck off that he was not going to show up for Court. **REEVES** stated no punishment will stop him and it is not against the law to threaten people.

7. On February 1, 2021, at approximately 1532 hours, **REEVES** called me again and wanted to know if I had the information already about his call to the Capitol. He stated he called the Capitol and told them he was going to kill them. **REEVES** then stated he was told they were going to kill him and his dog. **REEVES** then told me he was going to kill me. He was also going to kill everyone in the world. He then stated they are just words and he is allowed to say them.

8. On February 1, 2021, at approximately 1945 hours, **REEVES** called the White House Switch Board from telephone number [REDACTED] and threatened to kill everyone. **REEVES** then made the following statements to US Secret Service SA Scott Jensen:

“I’m going to kill all of you, because I’m capable.”

“I’m going to come kill the President.”

“I’m going to kill the Secret Service, because I own this whole planet”

REEVES then requested the US Secret Service come pick him up, and take him to the White House so he can punch the President in the face, sit in his chair, and stay there until he dies. When asked how he would accomplish his goals, **REEVES** said he had robbed a house when he was 15 and stole 20 guns, and he would do it again, and then find transportation to Washington, DC to kill everyone.

9. On February 1, 2021, at approximately 2211 hours, the United States Capitol Police contacted the US Secret Service as **REEVES** is calling their switchboard repeatedly making threats and stated there are five local police around him now, and is threatening to kill all of them.

10. On February 2, 2021, at approximately 0906 hours, **REEVES** called me again and stated he was tired of everyone bothering his Dad [REDACTED] so he was going to call 911 to

get arrested. **REEVES** stated he would probably be sentenced to a couple of years but will get out after a year because he will behave and only read books. **REEVES** continued that when he gets out of jail he will call me again and he will kill me.

11. **REEVES** currently resides with his father at [REDACTED] in Gastonia, North Carolina. He does not own a vehicle.

12. **REEVES** has been arrested or charged previously with the following: Assault (2020), Battery – Family Violence (2020), Terroristic Threats and Acts (2019, 2020), Throw Bodily Fluids on Employee by Prisoners (2020), Threaten Life of Public Employee (2020), Assault on Police Officer While Resisting Arrest (2020), Use of 911 Number Unlawfully (2020), Malicious Injury Willful Injury to Courthouse (2020), Burglary (2009), Criminal Trespass (2013), Violate Family Violence Order (2020), and Marijuana Possession (2019).

CONCLUSION

13. Based on the foregoing, probable cause exists that on January 28, 2021, and February 1, 2021, **David Kyle REEVES**, did knowingly and willfully make threats to take the life of and to inflict bodily harm upon the President of the United States, specifically, **REEVES** made threats against the President through verbal communication to myself, White House Communications Agency switchboard operator [REDACTED] and SA Scott Jensen.

All in violation of Title 18 United States Code Section 871.

/s/ John Robinson

Affiant, Senior Special Agent John Robinson
United States Secret Service

AUSA Bozin reviewed this affidavit.

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 3rd day of February, 2021, at 5:20 PM.

Signed: February 3, 2021



David C. Keesler
United States Magistrate Judge

