

UNITED STATES DISTRICT COURT

for the

United States District Court
Albuquerque, New MexicoMitchell R. Elfers
Clerk of CourtUnited States of America
v.

Jace Allen

YEAR OF BIRTH: 2006

Case No. **25mj3677**

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 September 11, 2025 in the county of McKinley in the
District of New Mexico, the defendant(s) violated:*Code Section*
18 U.S. Code § 875*Offense Description*
Interstate Communications

This criminal complaint is based on these facts:

Please see the attached affidavit of FBI Special Agent Michael Dalpini, which is incorporated by reference and has been reviewed and approved by Supervisory Assistant U.S. Attorney Matthew McGinley.

☒ Continued on the attached sheet.*Michael Dalpini*
Complainant's signatureSpecial Agent Michael Dalpini
Printed name and title

Telephonically sworn and electronically signed

Date: 9/12/2025City and state: Albuquerque, New Mexico*Steven C. Yarbrough*
Judge's signature

Steven C. Yarbrough, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA

Plaintiff,
vs.

JACE ALLEN (YOB 2006)

Defendant.

Case No. _____

AFFIDAVIT IN SUPPORT OF CRIMINAL
COMPLAINT

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Michael Dalpini, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since July 2022. I am currently assigned to the Albuquerque Field Office, Gallup Resident Agency. My primary duties as a Special Agent with the FBI in Gallup, New Mexico include investigating crimes occurring in Indian Country, which include homicide, assault, sexual assault, crimes against children, kidnapping, and bank robbery, among other federal violations. I have experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state, tribal, and federal law enforcement agencies. As a Federal Agent, I am authorized to investigate violations of the laws of the United States and have authority to execute criminal complaints and search warrants issued under the authority of the United States.

2. This affidavit is based upon my personal knowledge, as well as information reported to me by other federal, state, tribal, and local law enforcement officers during the course

of their official duties. Throughout this affidavit, reference will be made to law enforcement officers. Law enforcement officers are those federal, state, tribal, and local law enforcement officers who have directly participated in this investigation. This affidavit is also based upon information gained from interviews with cooperating witnesses, whose reliability is established separately herein.

PURPOSE OF AFFIDAVIT

1. On or about September 11, 2025, Jace Allen (“ALLEN”), year of birth 2006, transmitted in interstate commerce communications containing a threat to injure the person of another, in violation of 18 U.S.C. § 875(c).

2. This affidavit is intended to show merely that there is sufficient probable cause and does not set forth all of my knowledge about this matter. The information set forth in this affidavit has been derived from an investigation conducted by the Gallup (NM) Resident Agency (“RA”) and Toledo (OH) RA of the FBI. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary for the limited purpose of establishing probable cause to issue the requested Criminal Complaint. Additionally, unless otherwise indicated, wherever in this affidavit I assert that an individual made a statement, that statement is described in substance herein and is not intended to be a verbatim recitation of such statement. Furthermore, unless otherwise indicated, all statements contained in this affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

PROBABLE CAUSE

A. Background and Social Media Posts on X.com

3. On September 10, 2025, an unknown individual assassinated Charlie Kirk, the founder of Turning Point USA, during an event held at Utah Valley University in Orem, Utah.

4. Shortly after the assassination, the alias @ifunny_patriot/username Jebron Lames (“SUBJECT ACCOUNT”) posted the following on X.com:

Post 1

X User 1: “Sam, do you think it’s wise to be calling for mass violence after a right-wing influencer just got assassinated? Have some self-conscious thoughts please.”

SUBJECT ACCOUNT: “Nah I’m already on my way to commit a mass murder the time for talking is over.”

Post 2

X User 2: “He was the last person that still believed in debate. We don’t. You’ll get what you deserve [linked X user].”

X User 3: “What does he deserve? Are we about to make the same cyclical mistakes that got us here??

SUBJECT ACCOUNT: “We must murder all the niggers and Jews you have ruined American society for long enough. I promise you will see me in the news because I’m not scared to fucking do it just keep watching.”

Post 3

X User 4: “Do not respond with violence”

SUBJECT ACCOUNT: “Fucking watch me I’m going to kill as many libs niggers and Jews as it takes.”

Post 4

X User 5: “War . . . Who are you going to fight? Random folks going to work in the morning? Stop being dramatic.”

SUBJECT ACCOUNT: “Yes I plan on shooting up some specific places but I won’t name drop them on here.”

Post 5 and 6

X User 6: Reality is democrat leaders are denouncing violence and giving respect to Charlie and his family . . . While fringe maga republican leaders are taking the opportunity to make noise by calling for a ‘civil war’ and ride Charlie’s coattails even in death”

SUBJECT ACCOUNT: “You’re a fucking pussy and I’m coming for you first when this shit pops off. Civil war is happening.”

X User 6: “Haha you won’t do anything little cuck boy. You’re about as threatening as a hair on james wood’s partisan scrotum.”

SUBJECT ACCOUNT: “Just keep your eye on the news.”

Post 7

SUBJECT ACCOUNT: “You just watch me and many others already have plans set in motion this month is gonna be hell for all.”

Post 8

SUBJECT ACCOUNT: “They are Jews and libs and I personally will retaliate I promise you will see me in the news.”

Post 9

SUBJECT ACCOUNT: “I’ve literally beat at least 4 black men not to death but I wish I did.”

Post 10

SUBJECT ACCOUNT: “I’m literally dropping my next paycheck in a rifle we are so back.”

Post 11

X User 7: Shares a media article about a black servicemember “openly celebrating the death of Charlie Kirk. He needs to be investigated immediately.”

SUBJECT ACCOUNT: “I’m going to murder this guy this is not a joke this is a legitimate threat I will harm anyone who has something bad to say about Charlie.”

Post 12

X User 8: Shares a media article about “TMZ doubling down and refusing to apologize for the cheers heard from their employees just seconds before announcing the passing of Charlie Kirk calling them ‘not related’”

SUBJECT ACCOUNT: “They are my first target just keep watching the news.”

Post 13

X User 9: “Shut up and F***** do something. Don’t f***** tweet. P****.”

SUBJECT ACCOUNT: “Hey buddy I just bought a gun take a wild guess who I’m coming for tomorrow.”

Post 14 and 15

X User 10: “You, your son, and all of your friends will do nothing. Pussies.”

SUBJECT ACCOUNT: “Watch me, I’ve been making threats all night and today I’m finally gonna do it just keep your eyes on the news.”

X User 10: “No, you won’t”

SUBJECT ACCOUNT: “Drop your address I’ve already drive through 2 states I’m sure your not far.”

B. Law Enforcement Locate ALLEN

5. During this time, the FBI Toledo RA received a tip via its Guardian threat tracking system about the ongoing posts from the SUBJECT ACCOUNT. In addition to the posts above, the SUBJECT ACCOUNT informed an Ohio City Council Member the following: “You’re gonna be one of the first to die. I’ll be seeing you soon.”

6. Given the content of the posts, the FBI Toledo RA requested and received exigent account data for SUBJECT ACCOUNT. Telephone number ***-***-0735 was associated with the SUBJECT ACCOUNT. The FBI Toledo RA requested and received exigent location data for the phone associated with the SUBJECT ACCOUNT. That location data placed the phone in Jamestown, New Mexico. The Toledo RA also confirmed through law enforcement databases that the SUBJECT ACCOUNT was associated with a residential address in Jamestown, New Mexico. The Toledo RA immediately notified the FBI Gallup RA of the ongoing threat.

7. FBI Gallup RA arrived at the residential address in Jamestown, New Mexico associated with the SUBJECT ACCOUNT and found ALLEN at the residence.

C. Law Enforcement Interview ALLEN

8. On September 11, 2025, at approximately 5:55 PM law enforcement interviewed ALLEN, who provided the following information: ALLEN lives at the residence where he was interviewed. ALLEN is the owner of SUBJECT ACCOUNT and made all the posts on X.com previously mentioned. ALLEN's phone number is ***-***-0735. ALLEN identifies as a Neo-Nazi and hates Jews and minorities. ALLEN believes a civil war is inevitable in the United States and wants to help spark the civil war by terrorizing people online. ALLEN does not own any guns, but wanted to buy a rifle with a scope—the same make, model, and style that was used to assassinate Charlie Kirk.

9. ALLEN provided consent for law enforcement to search his cellular device that was utilizing telephone number ***-***-0735. On that device, law enforcement found the SUBJECT ACCOUNT logged in, as well as two videos of ALLEN dated August 14, 2025, shooting a rifle and a handgun at an unknown location.

CONCLUSION

10. Based on the above information, I submit that there is probable cause to believe that ALLEN violated 18 U.S.C. § 875(c), that being transmitting in interstate commerce communications containing a threat to injure the person of another. I therefore request that the Court approve the attached criminal complaint.

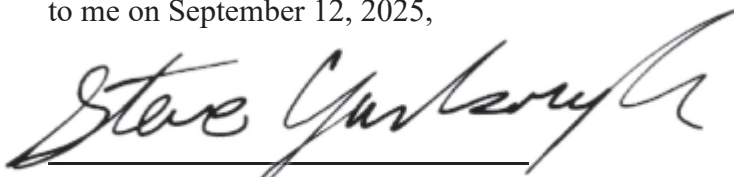
11. Supervisory Assistant United States Attorney Matthew McGinley reviewed and approved this complaint.

Respectfully submitted,

Michael Dalpini

Michael Dalpini
Special Agent
Federal Bureau of Investigation
Gallup, New Mexico

Electronically subscribed and telephonically sworn
to me on September 12, 2025,

A handwritten signature in black ink, appearing to read "Steve Yarbough", written over a horizontal line.

Honorable Steven C. Yarbough
United States Magistrate Judge