

UNITED STATES DISTRICT COURT
for the
Southern District of Iowa

United States of America
v.
Kuachua Brillion Xiong

Case No. 1:21-mj-94

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 December 21, 2021 in the county of Cass in the Southern District of Iowa, the defendant(s) violated:

Code Section 18 USC § 879 Offense Description Threats against a former U.S. President

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.

Sworn to before me and signed in my presence.

Sworn to before me by telephone or other reliable electronic means.

Date: 12/22/2021

City and state: Council Bluffs, IA via videoconference

Complainant's signature

Justin Larson, Secret Service Agent

Printed name and title

Judge's signature

Stephen Locher, U.S. Magistrate Judge

Printed name and title



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR
CRIMINAL COMPLAINT**

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Case No. 1:21-MJ-94

FILED UNDER SEAL

AFFIDAVIT IN SUPPORT OF
VIOLATIONS OF 18 U.S. CODE § 879 Making Threats Against a Former President

I, Justin Larson, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of criminal charges against Kuachua Brillion XIONG for violations of 18 U.S. Code § 879 – Making Threats Against a Former President.

2. I am a Special Agent (SA) with the United States Secret Service (USSS), stationed in Omaha, Nebraska. I have been employed with the USSS since May 2007. During those years I have been assigned to the Los Angeles Field Office, Special Operations Division in Washington DC, and the Omaha Resident Office. I have participated in numerous investigations ranging from financial crimes to Protective Intelligence cases dealing with threats against USSS protectees outlined in 18 USC 3056. The information contained herein was obtained by interviews of witnesses and law enforcement databases. I have not included the details of every aspect of this investigation. However, facts not set forth herein are not being relied upon me on seeking this court order, nor do I request that this court rely upon any facts not set forth in my affidavit in reaching a conclusion.

3. This affidavit is intended to show that there is probable cause to believe that Kuachua Brillion XIONG committed a violation of Title 18 Section 879 (Threats against former Presidents and certain other persons).



PROBABLE CAUSE

4. On December 21, 2021, the USSS in Omaha was contacted by Cass County (Iowa) Sheriff's Department Sgt. Tyler Shiels who stated that he stopped an individual, Kuachua Brillion XIONG, for driving aggressively, weaving in and out of traffic, and speeding on Interstate 80 east. Sgt. Shiels reported the following facts about the traffic stop:

"The vehicle appeared very "lived in" and saw several empty cans of Red Bull energy drinks throughout the vehicle, which is often consistent with people attempting to travel long distances with little rest time. While speaking with Xiong, I asked him where he was traveling to. Xiong stated that he was traveling to Washington DC. When asked for the reason for the trip to DC, Xiong stated he was going there to take pictures of the White House. Xiong stated he was recently fired from his job for what he believed to be an invalid reason. Xiong was asked further about his trip to DC. Xiong made a statement that he was traveling to see things because it is unknown how long he has here on earth. Xiong was asked if he had any hotel reservation in DC. Xiong made a statement to the extent that getting a hotel would not be necessary. Xiong began to attempt to control the conversation and began talking about his disapproval for government due to the sex abuse of children, some of which that has occurred by President Biden. Xiong made several statements to the extent that this type of behavior had to be dealt with. Due to my suspicion of criminal activity occurring, I asked Xiong if he possessed any narcotics, firearms and or US currency inside of the vehicle. Xiong indicated that he possessed a AR-15 style rifle and ammunition inside of the vehicle, but no other contraband. I asked Xiong for his consent to search his vehicle to verify that there was no additional contraband within the vehicle. Xiong consented without hesitation and allowed me to perform a search of the vehicle. Upon performing a brief search of the trunk of the vehicle, I located what appeared to be an AR-15 style rifle, loaded magazines, boxes of ammunition and several items of body armor and medical kits. Due to the nature of this stop, I requested dispatch to send me an additional officer to assist. I returned to my patrol car and waited to Officer Wendt (Adair, IA Police Dept) and Trooper Adam Brinker (Iowa State Patrol), to arrive at my location. I continued speaking with Xiong and Xiong stated that the weapons for his defense. Xiong was asked if he was suicidal. Xiong stated that he was not, but he would act in self-defense. Officer Wendt indicated to me that he located money inside the vehicle that was "ear marked" for Xiong's funeral expenses and that he had the White House on his GPS as the destination he was traveling to. I explained to Xiong that due to my concern for his well being, I was going to transport him to my Sheriff's Office to speak to someone about this situation. Xiong was cooperative and willing to do that. Based on his interaction, Sgt. Shiels detained XIONG at the Cass County Sheriff's Office for further interview by the USSS."

5. Continuing on December 21, 2021 Special Agent Scott Nelson and I traveled to the Cass County Sheriff's Office to conduct an interview of XIONG. The following paragraphs describe that interview:

6. Until approximately two months ago XIONG was working at a local grocery store in Merced, CA. XIONG stated that his employment at the grocery store was to be maintained as a "cover" until called upon by God to "combat evil demons in the White House". XIONG believes that he is the only person remaining who can free the United States of evil and it is necessary for him to kill those in positions of power. It is at this time XIONG began assembling the equipment needed to carry out his plan to kill those in power: an assault rifle, assault rifle magazines, ammunition, body armor, medical supplies, dark clothing, grappling hook, food, and cash.

7. During the course of the interview, XIONG allowed investigators access to his personal cellular phone to corroborate his statements. Investigators found detailed notes within XIONG's calendar and notes applications, including entries for "Survive supplies" on October 19th, "Safe life defense order" (body armor) on October 19th, "Safe life fed defense" on October 22nd, "Rifle pickup" on October 29th, "Silencer order" on November 5th, and "Save USA" on November 20th, 21st, and 27th.

8. XIONG told investigators that he departed his home near Sacramento, CA on or about Saturday, December 18th 2021 with the intention of driving straight to the White House in Washington, DC to kill persons in power. XIONG stated to investigators that if he had not been pulled over by law enforcement he would have continued traveling in furtherance of his plan. Investigators observed on XIONG's personal cell phone that he was using Google Maps to map a route to "1600 Pennsylvania NW, Washington, DC 20500", which is the address for the White House in Washington, DC.

9. While speaking with investigators XIONG stated that he used the mobile application TikTok to download videos to his cellular phone. XIONG used the downloaded videos to compile a list of evil individuals he intended to kill, which included but is not limited to the following politicians and public figures:

- a. Bill Clinton,
- b. Barrack Obama,
- c. Dr. Anthony Fauci, and
- d. Mark Zuckerberg.

10. XIONG added that he would kill President Joseph Biden unless he promised to comply to XIONG's demands. XIONG's TikTok "hit list", including approximately 100 videos, was observed by investigators within his personal cellular phone's photo album.

11. During the interview, XIONG detailed to investigators his plan to gain access to the White House complex. XIONG provided investigators with a drawing of the White House grounds, including a perceived "weak spot" he identified during his pre-attack research, which he intended to exploit during his attack. XIONG planned on using his grappling hook to climb over the perimeter fencing before gaining access to the White House to kill those on his "hit list".

12. When concluding the interview, XIONG stated that nothing would stop him from carrying out his plan of gaining access to the White House and killing the persons on his "hit list". He added that if released from custody he would immediately resume traveling to the White House in Washington, DC and "do whatever it takes" to complete his plan. XIONG stated that he has no intention of returning to California to see his family because he plans on dying while fighting evil demons at the White House.

CONCLUSION

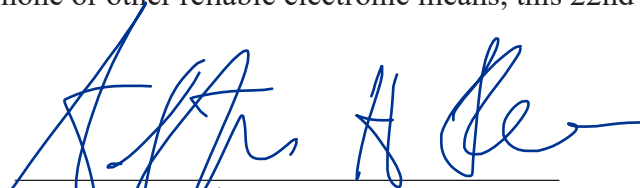
13. Based on the foregoing, there is probable cause to believe that Kuachua Brillion XIONG has committed the federal criminal offence of making a threat against the former President of the United States in violation of 18 U.S.C. § 879. There is also probable cause to believe that these violations did occur within the Southern District of Iowa.

Respectfully submitted,



Special Agent Justin Larson

Subscribed and sworn to before me by telephone or other reliable electronic means, this 22nd day of December 2021.



Stephen H. Locher
United States Magistrate Judge