

sworn police investigator employed by the St. Joseph County Prosecutor's Office. Kajzer has worked in law enforcement in a number of capacities, including 11 years as a City of South Bend police officer and six years as commander of the High Tech Crimes Unit of the St. Joseph County, IN Prosecutor's Office. He has nine years of experience in the private sector as a programmer, computer network engineer, and civilian forensic computer examiner. In his capacity as an investigator, among his assigned duties is the investigation of high-tech crimes. This includes, but is not limited to, crimes involving the Internet, Internet crimes against children, child exploitation, child pornography, and child sexual trafficking.

Kajzer learned of the Facebook post and immediately began to investigate in an effort to learn what was posted and who made the post. Much, if not most, of the information contained in this Affidavit was developed by Kajzer in his investigation.

Facebook

Facebook, Inc. is a corporation and an online social networking service (SNS) that was launched in 2004. Facebook uses the internet to provide the online social networking services by permitting users to communicate by sending electronic transmissions over the internet, an instrumentality of interstate commerce. Since 2006, anyone in general aged 13 or older is allowed to become a registered user of Facebook. Given that the age of

Facebook users is not verified, it can be difficult to identify the person associated with an account. A user registers for Facebook by providing a verified email address and password. Once registered, users can create a user profile, add other users as “friends”, exchange messages, post status updates and photos, share videos, use various apps, and receive notifications when others update their profiles.

Moreover, as part of the registration process, Facebook attempts to collect additional information from the registered user, such as a mobile phone number and date of birth. Moreover, registered users may join common-interest user groups organized by workplace, school, or other characteristics, and categorize their friends into various lists. Users also have the ability to file complaints against or block other users. Upon successfully registering, Facebook assigns the user a Facebook ID. The Facebook ID is a unique numeric ID that is tied to only one account, for example, www.facebook.com/1234567890. Moreover, users can also create a unique Profile URL that is tied to their Facebook ID. For example, www.facebook.com/john.doe.420. These two identifiers, Facebook ID and Profile URL, uniquely identify each Facebook account.

In addition to profile information that a Facebook user can access, Facebook also maintains information that the user cannot access. These are referred to as Neoprint and Photoprint. Both are compiled information

packages on accounts and data in which detailed profile and photo information are kept. This information includes data such as private messages, status updates, video and photograph links, future and past event calendar schedule, wall postings, and rejected friend requests.

Black Lives Matter

Black Lives Matter (BLM) is an international activist movement that was founded in July of 2013. The BLM movement campaigns against violence toward black people and regularly organizes rallies.

BLM uses social media platforms, primarily Facebook and Twitter, to reach thousands of people rapidly to organize rallies. The majority of BLM rallies are peaceful, but some have involved violent protests and unrest. Recently, during a peaceful BLM rally, suspect(s) ambushed and shot police officers that were working the event.

Facts In Support of Probable Cause

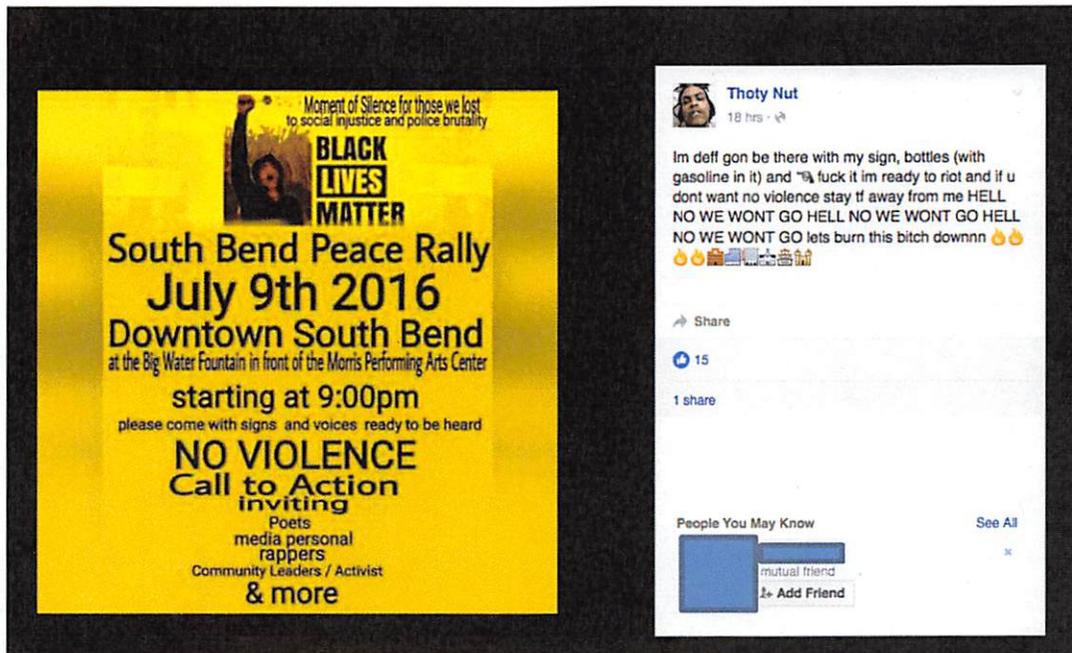
The following information has been largely derived from investigation by other law enforcement personnel. Specifically, the technical information about Facebook and efforts to identify the person who made the posts was performed by Kajzer.

The Threatening Posts

During the evening of 07/07/2016, a digital image announcing a BLM peace rally in South Bend, Indiana, began being distributed through social

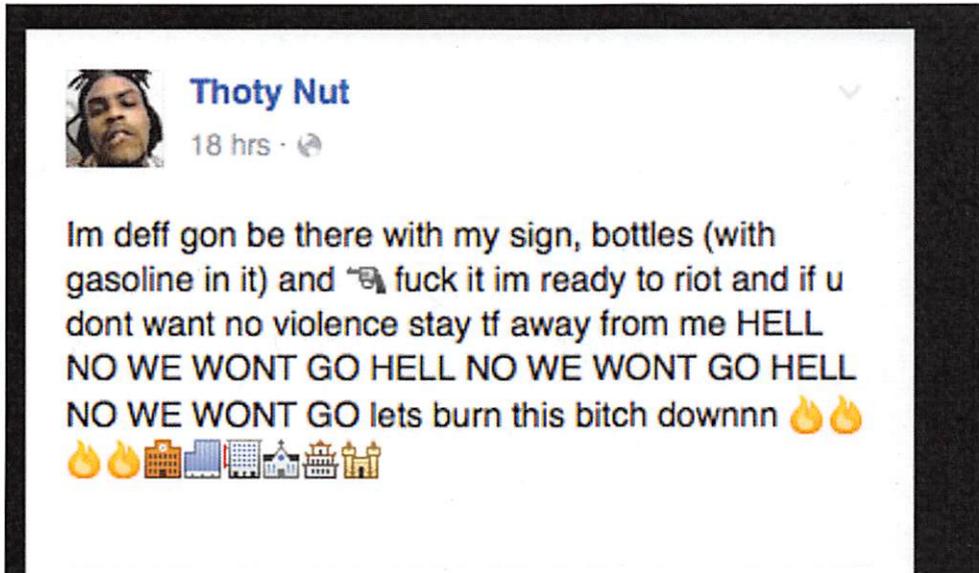
media, primarily Facebook. One user posting the digital image, along with comments, was a user by the name of Thoty Nut

(<https://www.facebook.com/thoty.nut.9> Unique Facebook URL 100012654344927). A screen shot of this post by Thoty Nut is as follows:



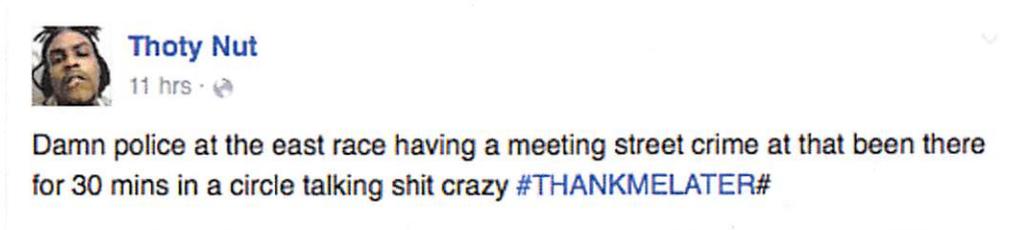
The digital image announcing this BLM rally indicates that it is a peace rally with no violence. However, several comments posted by Thoty Nut indicate the possibility of violence by him in what appears to be an effort to intimidate people or to destroy property. These comments include the fact that he will have bottles filled with gasoline and that he is ready to riot. He further relates that if others do not want violence, that they should stay away from him. He ends his post by stating, “lets burn this bitch downnn” along with emojis for a hand gun, fire and buildings.

The specific written posts enlarged from the above image for ease of reading follows:



A concerned citizen contacted the South Bend Police Department on 07/08/2016 with information regarding this post. This concerned citizen also emailed a copy of the post to the South Bend Police Department, along with the Facebook name of thoty.nut.9. The concerned citizen also provided a birthday for thoty.nut.9.

Shortly after this post, Thoty Nut posted a second digital image and comments related to civil unrest and actions against police. Moreover, he suggested that when people are ready to go, they can send him a message via his inbox or telephone him. That post and comments is as follows:



From this message, it appears that Thoty Nut was at or near the East Race Waterway located at 126 North Niles Ave., South Bend, Indiana, for at least 30 minutes observing the South Bend Police Department Street Crimes Unit as they were working in that area.

Identification of the Person Who Made the Posts

On 07/08/2016, using open source intelligence techniques, Kajzer conducted a search for any Facebook accounts related to Thoty Nut. That search resulted in a total of three accounts. Upon observing the photos contained in each of these accounts, all three individuals appear to be the same user.

The Facebook account thoty.nut contained a user name of Isaiah D. Beavers. Upon conducting a search on that name in the area of South Bend, IN, law enforcement learned of his full name, Isaiah Deonte Jovan Beavers, as well as his address, and other identifiers. The date of birth for Beavers matched the date of birth that the concerned citizen provided for the person who made the posts.

Upon checking the Indiana Bureau of Motor Vehicles, a driver's license photo of Beavers was located. That photograph appears to me to be the same

individual who is depicted in the photographs associated with the Facebook accounts.

From all of this information taken as a whole, it appears that the Facebook user account where the threat was posted, thoty.nut.9, is the account owned by Beavers. Moreover, the account of thoty.nut.9 is associated with two additional Facebook accounts, gnut.dagoon and thoty.nut.

Kajzer prepared an affidavit for a search warrant to be issued to Facebook requesting all account information and content from the three Facebook accounts related to Beavers. This affidavit was reviewed by Judge Elizabeth Hurley and she signed a search warrant at 12:47 pm. At approximately 12:53 pm, Kajzer submitted the search warrant to Facebook. Copies of this warrant were also sent to Special Agent David Allbritten of ATF, as well as me, Special Agent Timothy Theriault of FBI, and Detective Kyle Dombrowski of South Bend Police. Each of the above law enforcement personnel have been working on this investigation in various capacities.

At approximately 1:34 pm, Facebook responded to the search warrant. That information showed that the phone numbers associated with the Facebook accounts were determined to be associated with Beavers.

Facebook's response also included the following. The image of the BLM poster appears the same as the original post. Also, the text that was posted along with the BLM poster is also consistent with the post that initiated the

10001141470838 gnut.dagoon

Registration Information:

Registered Email gnut.dagoon@facebook.com
Addresses gnut_dagoon@yahoo.com

Vanity Name gnut.dagoon

Registration Ip

Address	Street
	City
	State
	Zip
	Country

Current City South Bend, Indiana (103983392971091)

Phone Numbers +15743235820 Cell Verified on 2012-04-14 22:45:44 UTC

The phone number for this account, gnut.dagoon, was a cellular telephone that was verified by Facebook on 04/14/2012. Upon tracing the phone number 574-323-5820, it returns to a T-Mobile cellular telephone in the area of South Bend, IN. Upon tracing the phone number 574-323-5820 through Facebook, it returns to the account of 10001141470838, gnut.dagoon, as shown by the following information obtained from Facebook.

100010047286330 thoty.nut

Registration Information:

Registered Email Addresses pnut_tha_goon@yahoo.com

Vanity Name thoty.nut

Registration Ip 2607:fb90:230b:f0c1:d223:933f:cbb:7dd4

Address Street
City
State
Zip
Country

Current City

Phone Numbers +15742614325 Cell Verified on 2015-09-13 18:10:50 UTC

The phone number for this account, thoty.nut, was a cellular telephone that was verified by Facebook on 09/13/2015. Upon tracing the phone number 574-261-4325, it returned to an active phone whose account is owned by Isaiah Beavers on a Verizon Wireless account:

NAME / SSN	ADDRESS	PHONE / TIMEZONE / SOURCE	CARRIER / LOCATION	DATES
Isaiah Beavers SSN: [REDACTED] <small>VIEW SSN</small> LexID: 191311756192	[REDACTED] AVE South Bend, IN 46613 Residence	574-261-4325 - EDT Real-Time Phones Active Phone	Cellco Partnership dba Verizon Wireless - IN	07/2015

Upon tracing the phone number 574-261-4325 through Facebook, it returns to the account of 100010047286330, thoty.nut.

Phone Number Deletion

Information derived from Facebook also indicated that the user deleted information that could be used to identify him shortly after the threatening



Thoty Nut

2 hrs · 🌐

Mfs want to march in peace 🙄🙄🙄🙄 yeah ok, im not saying that i knew any of the people or nothen like dat but the police just look at mfs that march in peace like yeah ok get on with your march well be back to it when yall done but look what happen in Baltimore after them mfs started rioting u aint heard bout no mo death's there from police have u ??? Dont worry ill wait, ijs tear this mf up come together as one AND BURN THIS MF DOWNNNNNNNNNNN 🔥🔥🔥🔥🔥🏢🏢🏢🏢 NO JUSTICE NO PEACE 🖐️🖐️🖐️🖐️ #POWERTOPEOPLE#

👍 9

11 Comments



Thoty Nut I feel where yall come from but fuck all that NO JUSTICE NO PEACE

👍 1 · 1 hr



Thoty Nut 🔥🔥🔥🔥🔥 BURN THIS MF DOWNNNNNNNN

1 hr



Thoty Nut Rashad Keny WHATS YO TAKE ON THIS

👍 1 · 1 hr



Thoty Nut I really dont give af what no one thinks really tbh

1 hr



War is coming we are slaves believe it or not but we will know when it time and warning signs say any moment so I suggest we jus be armed and ready

👍 1 · 1 hr

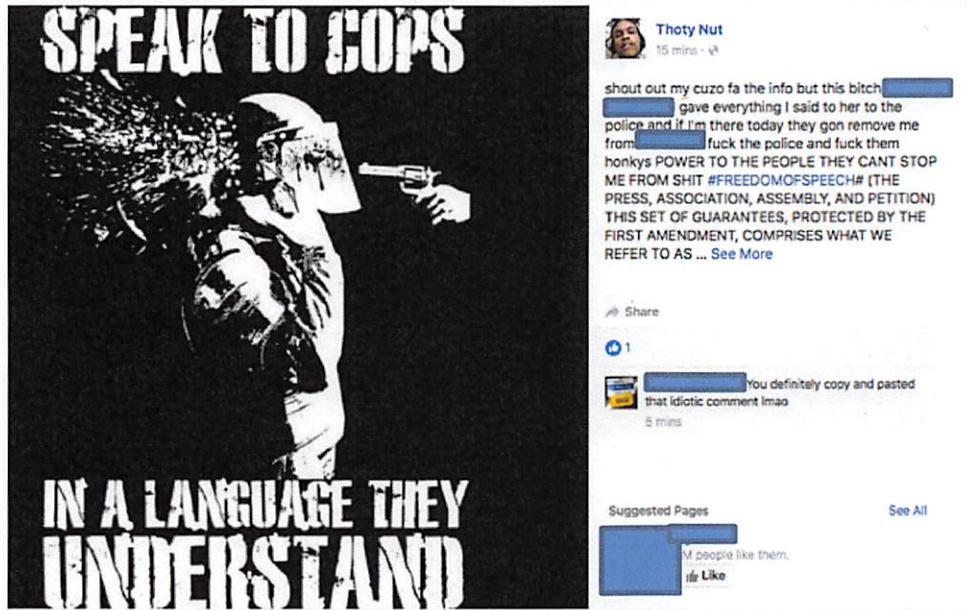


Thoty Nut [redacted] well said my brother 🖐️🖐️🔫🔫🔫🔫

1 hr

Law enforcement has also learned of another post that was made today,

Saturday, July 9, 2016.



This post was made at 10:25 am, Saturday, July 9, 2016. Facebook deleted this post at 10:45 am. At about 10:50 am, Beavers posted a screenshot of this same post.

The Statute Violated

Federal law provides several statutes that Mr. Beavers may have violated. Title 18, United States Code, Section 844(e) provides that:

Whoever, through the use of the mail, telephone, telegraph, or other instrument of interstate or foreign commerce, or in or affecting interstate or foreign commerce, willfully makes any threat, or maliciously conveys false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive shall be imprisoned for not more than 10 years or fined under this title, or both.

Based upon the above, it appears that Isiah Deonte Jovan Beavers is the author of the threatening posts. It also appears there is probable cause to believe that Beavers' posts have violated federal law. He threatened to kill, injure or intimidate individuals and he threatened to unlawfully damage or destroy buildings by means of fire or explosive.

Conclusion

Affiant believes there is probable cause that Beavers violated Title 18, United States Code, Section 844(e). Affiant respectfully requests that a warrant be issued for his arrest.

Further, affiant says nothing.



Timothy J. Theriault
Special Agent, FBI

Subscribed and sworn to before me this 9th day of July, 2016.

S/Christopher A. Nuechterlein

Christopher A. Nuechterlein
United States Magistrate Judge
Northern District of Indiana
South Bend Division