

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
25-mj-701 (ECW)

STATE OF MINNESOTA)
) ss. AFFIDAVIT OF CALEB JURCHISIN
COUNTY OF HENNEPIN)

1. Your Affiant is a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since June of 2024. I am currently assigned to the Minneapolis Division in Brooklyn Center, MN. I have gained experience in the conduct of criminal investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state, and federal law enforcement agencies. As part of my current duties, I conduct investigations of violent crimes occurring in Minnesota and throughout the United States. These investigations have included the use of various law enforcement techniques and the execution of various search, seizure, and arrest warrants. In my current duties as a Special Agent, I investigate criminal cases relating to domestic terrorism, amongst other crimes and criminal activity. I have received specialized training in domestic-terrorism investigations, and I have investigated and assisted in the prosecution of domestic-terrorism crimes. Throughout my time as an investigator, I have been tasked with the investigation of a variety of crimes to include threatening communications, harassment and stalking, domestic violence, controlled substance trafficking, labor trafficking, burglary, and fraud.

2. This Affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Tyler Maxon

AVALOS (YOB 1995) for Interstate Transmission of a Threat to Injure the Person of Another, in violation of 18 U.S.C. § 875(c).

3. This Affidavit is based on my personal knowledge, as well as information I have learned from other law enforcement officers involved in the investigation, and the review of reports, written materials, and recordings. This Affidavit, however, does not include all the details of the investigation known to me or the government; rather, it only includes information believed to be sufficient to establish probable cause for the charge in the Complaint.

PROBABLE CAUSE

4. On or about October 9, 2025, a known and identified TikTok user from Detroit, Michigan, submitted a report to the FBI National Threat Operations Center (NTOC)¹ regarding a threatening post against United States Attorney General Pam Bondi that had come across the user's TikTok feed.

5. The TikTok user reported the threat as a murder for hire of US Attorney General, Pam Bondi. The TikTok user reported that the threatening post was "Imposing a hit on Pam bondi for \$45,000 posting it on tiktok his user name is @liminalvoidslip."

6. The FBI obtained screenshots of the TikTok threatening post and the suspect user's page, which are both depicted below:

¹ The National Threat Operation Center is a central intake for all telephone and electronic tips from the public to the FBI, which is staffed by threat intake examiners who evaluate the information from those tips and calls and determine where to send the information received for further law enforcement action.



7. As depicted above, the threatening post has a photograph of United States Attorney General (“AG”) Pam Bondi, with a sniper-scope red dot on AG Bondi’s forehead. The caption reads, “WANTED: Pam Bondi” / “REWARD: 45,000” / “DEAD OR ALIVE” / “(PREFERABLY DEAD)”. Additionally, the suspect user posted a comment below the depiction that reads “*cough cough*” / “when they don’t serve us then what?”

8. Your Affiant also noted that the username on the suspect user’s TikTok page was displayed as **Wackø**, which Your Affiant recognized, based on his training and experience, as a symbol for anarchy. Additionally, the suspect

user's TikTok page had a link to An Anarchist FAQ book pinned to his page. According to open-source research, as well as based on Your Affiant's training and experience, "anarchism" is a political philosophy and movement that seeks to abolish all institutions that perpetuate authority, coercion, or hierarchy, primarily targeting the state and capitalism. Anarchism advocates for the replacement of the state with stateless societies and voluntary free associations.

9. FBI Agents in the Detroit, MI area submitted an Emergency Disclosure Request ("EDR") to TikTok through TikTok's online portal for information pertaining to the username @liminalvoidslip.

10. TikTok responded to the EDR and informed the FBI that the device used to signup the suspect TikTok user account was an SM-S916U (Samsung Galaxy), on 09/07/2025 at 9:15 AM, with a signup IP address of 73.242.61.241. Additionally, TikTok reported that the signup platform used was Google, with an email address of [REDACTED]@gmail.com.

11. Detroit FBI Agents then submitted an EDR to Google and Comcast for subscriber information related to the email address and the IP address used on the date and time referenced above.

12. Google responded to the EDR and provided numerous IP logins as recently as 10/3/2025 in the Minnesota area. The subscriber name was listed as "Grey." The Device and Account identifiers revealed the device had user emails that included [REDACTED]@gmail, as well as tyler [REDACTED]@gmail.com. Your Affiant notes that the second gmail address provided by Google corresponds to the

suspect's first name, last name, and year of birth. Additionally, the device attributes were a Samsung SM-S916U, which matched the device-model from the TikTok EDR results.

13. Comcast responded to the EDR and advised the IP in question used on 09/07/2025 showed subscriber name Tyler AVALOS, with phone number 612-xxx-9269, and address ■■■ Hyacinth Ave W, Apartment xxx, in St. Paul, MN 55117.²

14. Your Affiant ran a check of Minnesota state supervision records for AVALOS and learned that his present record shows him to reside at ■■■ Hyacinth Ave W with the same apartment number. FBI Agents then confirmed with Comcast that the "■■■" address provided by Comcast in the EDR was the listed service address, and the "■■■" address is the billing address for AVALOS. FBI agents conducting surveillance, however, observed AVALOS exiting ■■■ Hyacinth Ave W at approximately 2:40 p.m. on 10/16/25. Additionally, FBI agents observed the name tag "T Avalos" on the mailbox for AVALOS's apartment number inside the ■■■ Hyacinth Ave W address.

15. Your Affiant also checked AVALOS's criminal history and learned that he has a multi-state conviction history including a July 2022 felony stalking conviction from Dakota County, an August 2016 felony third-degree domestic battery from Polk County, Florida, and an April 2016 misdemeanor domestic assault from Dakota County, which appears to have been reduced from a felony domestic assault by strangulation charge.

² The actual phone number and apartment number are known to Your Affiant but are anonymized in the Affidavit for privacy reasons.

16. Based on the foregoing, Your Affiant has probable cause to believe that AVALOS did knowingly transmit, in interstate and foreign commerce, communications consisting of an online post containing a threat to injure the person of another, in violation of 18 U.S.C. § 875(c).

Respectfully submitted,



CALEB JURCHISIN
SPECIAL AGENT, FBI

SUBSCRIBED and SWORN before me
by reliable electronic means (via FaceTime and
box on USAfx) pursuant to Fed. R. Crim. P. 41(d)(3)
on October 16, 2025:



ELIZABETH COWAN WRIGHT
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA