

UNITED STATES DISTRICT COURT
for the
District of Columbia

FILED

SEP 20 2020

United States of America
v.
Pascale Cecile Veronique Ferrier
Defendant(s)

Clerk, U.S. District and
Bankruptcy Courts
Case: 1:20-mj-00184
Assigned to: Judge Robin M. Meriweather
Assign Date: 9/20/2020
Description: COMPLAINT W/ ARREST WARRANT

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 18, 2020 in the county of in the
District of Columbia, the defendant(s) violated:

Code Section
18 U.S.C. § 871

Offense Description
Threats against the President of the United States

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

Jonathan V Preston
Complainant's signature

Special Agent Jonathan Preston
Printed name and title

Attested to by the applicant in accordance with Fed. R. Crim. P. 4.1 by telephone.

Date: 09/20/2020

Judge's signature

2020.09.20 20:45:53
-04'00'

Judge's signature

City and state: Washington, D.C.

Magistrate Judge Robin Meriweather
Printed name and title

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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jonathan Preston, being duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent Bomb Technician with the Federal Bureau of Investigation (FBI) assigned to the Washington, D.C., Field Office. I joined the FBI in 2009 as a Biologist and in 2012 as a Special Agent. I am currently a Special Agent Bomb Technician on a squad that responds to and investigates weapons of Mass destruction (WMD) and explosive precursor/bombing matters. I hold a bachelor's degree in forensic biology, a Public Safety Bomb Technician Certification and I have obtained extensive academic and professional training and experience on WMD and explosive matters. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7).
2. I make this affidavit in support of criminal complaint charging defendant **Pascale Cecile Veronique Ferrier** with Threatening the President of the United States, in violation of Title 18, United States Code, Section 871.
3. Specifically, as set forth below, there is probable cause to believe that the defendant knowingly and willfully threatened 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.
4. The facts set forth in this affidavit come from my personal involvement with this investigation, interviews with witnesses, review of documents, and forensic investigation and analysis.
5. In submitting this affidavit, I have not included each and every fact known to me about this investigation. Rather, I have included only those facts I believe sufficient to establish probable cause.

PROBABLE CAUSE

6. On 18 September 2020, at approximately 0900, United States Secret Service (USSS) notified FBI Washington Field Office of a letter addressed to "Donald J Trump, The White House, 1600 Pennsylvania Avenue NW, Washington DC 20500 USA." This letter was post-marked from Canada and traveled interstate via U.S. postal service and arrived at the White House Mail Sorting Facility in Washington, D.C. Upon being reviewed by USSS personnel at the facility on approximately September 18, 2020, the FBI Washington Field office was contacted and responded to the facility. Review of the letter revealed it contained a white, powdery material and stated the following:
 - a. "...I found a new name for you: "The Ugly Tyrant Clown" I hope you like it. You ruin USA and lead them to disaster. I have US cousins, then I don't want the next 4 years with you as president. Give up and remove your application for this election. So I made a "Special Gift" for you to make a decision. This gift is in this letter. If it doesn't work, I'll find better recipe for another poison, or I might use my gun when I'll be able to come. Enjoy! FREE REBEL SPIRIT".
 - b. Based upon my training and experience, I know Ricin to be an extremely toxic plant protein derived from seeds of the castor bean plant (*Ricinus Communus*). Ricin causes toxicity by inhibiting the formation of proteins in the exposed individual. The material found in the letter was field tested by USSS personnel and tested as presumptive positive for Ricin. This field test presumptive positive result was confirmed via extensive laboratory testing by the National Bioforensic Analysis Center in Frederick, Maryland, which found that the substance tested positive for Ricin toxin.
7. While submitting the letter for forensic examination, Washington Field Office was informed of the existence of six additional letters that appeared similar from other FBI field offices in Texas. The letters from the other FBI field offices were received on September 15-16, 2020,

and also had cancellation stamps indicating mailing from Canada, contained a powdery substance, and were addressed to individuals working at penitentiaries and detention centers in Texas. The letters contained similar language to the letter sent to the President and were addressed to individuals affiliated with facilities at which the defendant had been housed while incarcerated in Texas in 2019. Each of the letters contained the statement referencing "if it doesn't work I will find a better recipe" and all contained similar material to the material found in the letter received at the White House Mail Sorting Facility in Washington, D.C.

8. Subsequent investigation of individuals with Canadian connections recently arrested and incarcerated in the FBI San Antonio area of responsibility revealed an individual by the name of Pascale Ferrier who had been arrested by Mission Police Department (Mission, TX) on March 13, 2019, for weapons possession and was transferred into Immigration and Customs Enforcement (ICE) custody.
9. A comparison of the letters received in San Antonio/Houston and Washington, D.C. showed multiple similarities. Further investigation of the letters revealed enough similarities between the letters to conclude the Texas and Washington DC letters were sent by the same individual. Similarities included a signature block of "FREE REBEL SPIRIT" and matching language in each letter similar to "special gift for you," and "if it doesn't work I will find a better recipe for another poison or I might use my gun when I'll be able to come" in some of the San Antonio letters and the letter in Washington, D.C. Forensic examinations conducted at the National Bioforensic Analysis Center (NBFAC) of all letters received in Texas and Washington, DC revealed latent fingerprints on four (4) of the letters recovered in San Antonio. Manual examinations of the recovered fingerprints revealed a match to fingerprints in FBI databases to the defendant. Investigation of the defendant's social media platforms revealed FaceBook and Twitter postings on or about September 9, 2020, which referenced "#killTrump" and discussed wording such as "Ugly Clown Tyrant" (which is nearly the same wording used in the letter sent to the President). Investigations of these postings and 2702d returns from Twitter and

Facebook revealed the registration email address as Google email address Pascale.Ferrier@gmail.com.

10. On September 20, 2020, the defendant attempted to enter the United States at the Peace Bridge border crossing in Buffalo, New York, from Canada, and was detained by Customs and Border Patrol Officers (CBP). The defendant made statements to CBP Officers referencing "being wanted by the FBI for the ricin letters," and was found to be in possession of a loaded firearm in her waistband, as well as a knife.

CONCLUSION

11. Based upon my knowledge, training and experience, and the facts set forth in this affidavit, I respectfully submit there is probable cause to believe that the defendant committed Threats Against the President, in violation of Title 18, United States Code, Section 871.

Respectfully submitted,

Jonathan V Preston

Jonathan V. Preston

Special Agent Bomb Technician
Federal Bureau of Investigation

Subscribed and sworn pursuant to Fed. R. Crim. P. 4.1
on September 20, 2020



Robin M. Meriweather

2020.09.20 20:48:30
-04'00'

The Honorable Robin M. Meriweather
United States Magistrate Judge

AO 442 (Rev 01/09) Arrest Warrant

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ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Pascale Cecile Veronique Ferrier
who is accused of an offense or violation based on the following document filed with the court:

- Indictment, Superseding Indictment, Information, Superseding Information, Complaint, Probation Violation Petition, Supervised Release Violation Petition, Violation Notice, Order of the Court

This offense is briefly described as follows:
18 U.S.C. Section 871 (Threats Against the President of the United States)

Date: 09/20/2020



Handwritten signature of Robin M. Meriweather

2020.09.20
20:48:03 -04'00'

Issuing officer's signature

City and state: Washington, DC

Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) and the person was arrested on (date)
at (city and state)

Date:

Arresting officer's signature

Printed name and title