

UNITED STATES DISTRICT COURT  
for the  
Northern District of Oklahoma

FILED

JUL 15 2020

United States of America )  
v. )  
ADAM MAXWELL DONN )  
\_\_\_\_\_)  
*Defendant(s)*

Mark C. McCart, Clerk  
U.S. DISTRICT COURT

Case No. *20-mj-180-PJC*

FILED UNDER SEAL

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 June 11, 2020-June 22, 2020 in the county of Tulsa in the  
Northern District of Oklahoma, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2261A(2)(B)	Cyberstalking

This criminal complaint is based on these facts:

See Attached Affidavit by Special Agent Christopher McCarthy, Federal Bureau of Investigation

Continued on the attached sheet.

*Christopher McCarthy*  
Complainant's signature

Special Agent Christopher McCarthy, FBI  
Printed name and title

Sworn to before me and signed in my presence.

*telephone*

Date: 07/15/2020

*Paul J. Cleary*  
Judge's signature

City and state: Tulsa, OK

Magistrate Judge  
Printed name and title

## AFFIDAVIT

I, Christopher McCarthy, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation, United States Department of Justice, and as such, I am an investigative or law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code. I am currently employed as a Special Agent with the FBI and have been so employed since November 2019. I am presently assigned to the Tulsa Resident Agency of the FBI, where I investigate and have investigated violations of federal criminal law. I have gained experience and knowledge through training and everyday work related to conducting these types of investigations.

2. As a result of my training and experience as a FBI Special Agent, I am familiar with Federal criminal laws. I know cyberstalking is a violation of Title 18, United States Code, and Section 2261A. 18 U.S.C. § 2261A(2)(B) states the following:

**(2)** Whoever – with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, uses the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that –

**(B)** causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person described in clause (i), (ii), or (iii) of paragraph (1)(A), shall be punished for not more than 5 years, in any other case, or both fined and imprisoned.

3. The statements in this affidavit are based in part on information provided by the Tulsa Police Department's (TPD) investigation of harassing, intimidating, and threatening messages over electronic and oral communications, which were directed towards Tulsa Mayor George T. (GT) Bynum, his wife Susan Bynum, and their children in Tulsa, Oklahoma, in the Northern District of Oklahoma, and on my experience and background as a FBI Special Agent. Since this affidavit is being submitted for the limited purpose of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to assist in the issuance of a Complaint and to establish probable cause to believe a violation of Title 18, United States Code, Sections 2261A(2)(B) was committed by ADAM M. DONN.

### **PROBABLE CAUSE**

4. On June 18, 2020, Tulsa Police Department (TPD) Officer, Brian Booth was contacted about harassing/threatening emails being sent to Mayor George T (GT) Bynum and his family. The Mayor was concerned the person sending the e-mails was in the Tulsa area and may intend to do him harm. TPD was sent copies of the messages that had been sent starting on June 11, 2020.

Upon examination of the e-mails, investigators were able to identify the IP address 72.218.106.53 from an IT employee at Susan Bynum's Law Firm. A Tulsa County search warrant was issued for the account holder information on the IP address at the time the message was sent. The IP address came back to a Cox Communication account. The account holder was

Adam Donn [REDACTED] Norfolk, Virginia 23507. The account information also included Adam Donn's e-mail address, AdamMDonn [REDACTED] and phone number, [REDACTED]

The e-mail address, AdamMDonn [REDACTED] was used to send many messages to Susan and GT Bynum. The Cox Communications warrant returns linked this e-mail to Adam Donn's Cox Communications account.

The phone number used to send voice messages to Susan Bynum was [REDACTED]. This number was used to send all the harassing, threatening, and explicit voicemails to Susan. This number was also identified as Adam Donn's phone number from the account information through the Cox Communication warrant return.

A second e-mail address, maxwelladamdonn [REDACTED] was also used to send a message to Susan Bynum.

5. The e-mails and voice messages were electronic communications intended to terrify, intimidate, harass, and threaten the Bynum family by causing emotional distress and insinuating they would suffer physical harm. In the electronic communications the person later identified as Adam Donn failed to identify himself in the e-mails and voice messages. The e-mails came from the email address AdamMDonn [REDACTED]. Below are the messages Mayor GT Bynum and his family received:

6. Messages from e-mail AdamMDonn [REDACTED] to GT Bynum's city of Tulsa internal e-mail address:

06/11/2020 at 21:38 hours, Subject: "Convention"; Message body: "You are fucking idiot hosting a convention. Here's hoping you and your family get Coronavirus! Have a great day. An ER physician."

06/14/2020 at 8:29 hours, Subject: "Covid 19 projections"; Message body: "Covid-19 cases are rising in Tulsa County. North Carolina is seeing a rise in cases as well and decided in the best interest of the communities health to not hold an indoor rally. So lets be smart during the pandemic and host the indoor rally here in Tulsa that way I can be remembered as the mayor who stood up for the health and well being of the citizens. You and Susan deserve Coronavirus."

06/17/2020 at 17:05 hours, Subject: "Doctors shouldn't have to treat people stupid enough to go to a rally"; Message body: "As a physician I shouldn't have to treat people stupid enough to go to a rally in the middle of a pandemic. Not only are you putting your fellow citizens at risks you are putting healthcare workers like myself at risk. Thank God I left the Republican party and you really should be ashamed of yourself allowing this rally to happen. Can we say no backbone subservient to Trump. Sad."

06/18/2020 at 14:16 hours, Subject: "[Bynum Son] and [Bynum Daughter]"; Message body: "I hope you are planning to bring [Bynum Son] and [Bynum Daughter] to the rally! Maybe they can even get a photo with Trump!!! Susan Bynum stuck a post-it note on the bathroom mirror that read, "It's about a better city for our kids." That's what you are doing right ??"

06/19/2020 at 11:10 hours, Subject: "Hoping you, susan, [Bynum Son], [Bynum Daughter] get covid"; Message body: "You are a spineless backboneless piece of shit."

Fuck you Fuck Fuck [Bynum Son] and Fuck [Bynum Daughter]. Your family deserves coronavirus and truly hope your lineage comes to an end. You pick a rally over the health of your city. You will go down in history as someone who let coronavirus take a hold of tulsa instead of trying to contain it. Fuck you fuck your cunt of wife and all your family. I hope you rot in hell."

06/19/2020 at 12:05 hours, Subject: "Nice show of support for Tulsas doctors and nurses"; Message body: "History will remember as the mayor who spread covid. You are a fucking idiot. Wishing you, susan and the whole gang get coronavirus. Btw the cops dont want you hanging out with them during the rally they want to be home not working the rally you fucking idiot. Burn in hell"

06/19/2020 at 15:01 hours, Subject: "Hope Susan, [Bynum Son], and [Bynum Daughter] suffer"; Message body: "Dont forget to let your kids know daddy has no backbone and picked Trump over the health and well being of Tulsans. I hope your family suffers. You all deserve covid and I hope you get. You are a truly horrible human being. History will judge you Fuck U"

06/19/2020 at 15:14 hours, Subject: "Publishing your kids info, [Bynum Son] and [Bynum Daughter]"; Message body: "You are a murderer and just dont know it yet. You are putting everyone in Tulsa at risk so Im gonna put your family at risk. Gonna be putting out Susan, [Bynum Son], and Iii [Bynum Daughter]s cell numbers, social media passwords, maybe Susans direct line at Dorwart. Maybe your cell?? Maybe show up to meet at your next bible study?? You are spineless and you and your family deserve covid. Fuck u. Its on."

06/19/2020 at 15:25 hours, Subject: "You call yourself a Catholic"; Message body: "And you call yourself a Catholic. Sure wish I can be there on your Judgement Day. Now go bend over for Trump you fool and get these 20,000 people into Tulsa."

06/19/2020 at 20:34 hours, Subject: "Some kind of Catholic your are"; Message body: "Some kind of Catholic you are. Putting the health and safety of your city to appease a narcissistic president. Very Catholic of you. I pray you and your family end up on ventilators. Fuck you Fuck Susan Fuck [Bynum Son] Fuck [Bynum Daughter] History will not judge you well. Rot in hell."

06/19/2020 at 20:39 hours, Subject: "Bend over again for Trump over curfew"; Message body: "Nice. Throw the police chief under the bus and take orders from Trump you stupid minion. Clearly being raised Catholic gives you a propensity to take it up the ass. Fuck you and Fuck Susan !"

06/20/2020 at 07:27 hours, Subject: "History will remember as the mayor who let covid take over"; Message body: "Hopefully you and your family will get it. Next time you are in church think about how many more people will get Covid because of you."

06/20/2020 at 11:35 hours, Subject: "Wish I could hear you explain to [Bynum Son] and [Bynum Daughter] how daddy put Tulsa first"; Message body: "I mean he did put Tulsa first right?? Of course he did, this rally was "an honor" right???"

06/20/2020 at 13:32 hours, Subject: "6 Trump campaign staffers test positive for Covid-19"; Message body: "Told you so you dumb fucking idiot Way to put the health of Tulas citizens first. Some catholic you are. You deserve covid."

7. Message from AdamMDonn [REDACTED] to Mayor GT Bynum's personal email:

06/20/2020 at 17:43 hours, Subject: "Way to go"; Message body: "Nice job putting the citizens of Tulsa first. Heres hoping Susan , [Bynum Son], and [Bynum Daughter] get covid you fool. And you call yourself Catholic. Shame on you. It would an honor to see you get Covid. History will remember you as the 1st mayor to host a super spreader event in the middle of a pandemic. Fuck u."

8. Message from AdamMDonn [REDACTED] to Mayor GT Bynum's personal email address, and both internal and external city of Tulsa email addresses,:

06/22/2020 at 17:23 hours, Subject: "2 more campaign staffers, 2 secret service members confirmed positive"; Message body: "That brings the total to 10 who have now tested positive. If you were near secret service and Im guessing you were when you met your buddy trump at the airport then you should probably quarentine This is why everyone warned against a rally. And its just the beginning, I wonder how many more people from the rally will be getting sick the next few weeks. Oh yeah, Youve exposed your family and staff now as well. Still an honor to have your superspreader event?"

9. Message from e-mail maxwelladamdonn [REDACTED] to Susan Bynum's law firm email address:

06/17/2020 at 21:36, Subject: "N/A"; Message body: "As a physician I implore, beg of you, have your husband cancel this rally. History will not judge him well. A mayor's first job is to protect the lives and health of the citizens he represents. Allowing 20,000 people to gather when Tulsa is seeing a surge in cases is irresponsible and borderline negligent.

It shows a complete disrespect for the countless public safety personnel assigned to work the rally as well as being a complete slap in the face to myself as well as other physicians working around the clock dealing with the surge of cases in Tulsa. Where are my rights as a doctor to not be exposed to Coronavirus. At this point I dont believe the mayor is listening to reason, maybe he will listen to you. You have the chance to SAVE 20,000 lives. You know in your heart allowing 20,000 people to gather will have far reaching public health consequences. Please have your husband make the right choice. Tulsa does not need a rally right now. Please."

10. Messages from e-mail AdamMDonn [REDACTED] to Susan Bynum's law firm email address:

06/17/2020 at 22:31 hours, Subject: "Healthcare attorney"; Message body: "Your husband threw every doctor under the bus having this rally I!! He is a fucking idiot and here's to hoping yoy and your family get Coronavirus. You deserve it cunt."

06/18/2020 at 11:40 hours, Subject: "Fwd: You and your family deserve covid"; Message body: "I think Mark should go maskless to the rally. Maybe bring the kids?? I mean he is letting it happen, why isn't he going. You and your family deserve Covid."

06/18/2020 at 12:48 hours, Subject: "Cunt"; No message body

06/18/2020 at 14:10 hours, Subject: "[Bynum Son] and [Bynum Daughter] going to rally since its safe right??"; Message body: "Im sure you will be taking them since its safe.

Maybe they can even get s photo with Trump!!!Susan Bynum stuck a post-it note on the bathroom mirror that read, "It's about a better city for our kids." Thats what your husband is doing right???"

06/18/2020 at 15:57 hours, Subject: "[Bynum Son] and [Bynum Daughter] deserve Covid and so do u" (an emoji with red lips was left at the end of the subject line); Message body: "[Bynum Son] Lafortune is probably rolling in his grave. Take the family to the rally in his honor!!!"

06/19/2020 at 11:08 hours, Subject: "Your wonderful husband picks a rally over the health of Tulsa citizens"; Message body: "Shame on you and your whole family. If my prayers are answered your lineage will come to an end. Heres hoping you get coronavirus and hope your husband rots in hell. Fuck u cunt!!!"

06/19/2020 at 11:12 hours, Subject: "CUNT"; No message body

06/19/2020 at 11:35 hours, Subject: "your husband is a murderer"; Message body: "Your husband is a muderer. History will judge him as the 1st mayor to allow a large gathering and you better believe it will be his downfall. You think 20,000 people will get together and not one person will end up sick. George not Donald will get the blame. You havent learned that in 3 yeard of Trump. Fuck you and your family. Hope you get covid"

06/19/2020 at 12:01 hour, Subject: "Doctors for Bynum. Lolololol"; Message body: "Yeah right. Not only is your husband putting medical personnel at risk ( good show of support for doctors and nurses!!). He is putting all the public safety at risk who must work tomorrow. It only take one sick person out of 20,000. Hopefully it will spread to your family. You deserve it. Maybe Trump will give you hhydroxychloride. Fucking bitch. Fuck your family cunt."

06/19/2020 at 12:10 hours, Subject: "Every doctor in the world " large crowds not good idea". GT "hmmm I'll invite 20,000 people to Tulsa"; Message body: "You are married to

a spineless murderer. Dont forget to let little [Bynum Son] and [Bynum Daughter] know daddy put everyone in Tulsa at risk. Bitch"

06/19/2020 at 12:16 hours, Subject: "Bynum voted Americas most hated mayor. USA Today"; Message body: "You picked a winner!!! Dumb cunt. Hope you and your family get covid. You deserve it."

06/19/2020 at 12:21 hours, Subject: "[Bynum Son] and [Bynum Daughter]"; Message body: "Hope you are taking them to the Trump rally since its safe and such a good thing for Tulsa right ??? Maybe they can even get a photo with Trump. Wow. Wouldn't that be great!!!"

06/19/2020 at 14:58 hours, Subject: "You and your family deserve covid"; Message body: "Your spineless husband and the rest of your family deserve covid. Let your kids know daddy decided to bend over for Trump instead of protect the health of Tulsans. Fuck you. Hope your family suffers."

06/19/2020 at 15:04 hours, Subject: "Hope your family suffers"; Message body: "You deserve covid. Fucking cunt bitch Your whole family should suffer and your husband is a fucking coward."

06/19/2020 at 15:08 hours, Subject: "Publishing [Bynum Son] n [Bynum Daughter]s info"; Message body: "Get ready bitch. Your family wants to put Tulsa at risk Im putting you at risk. Gonna be publishing your home address , kids cell numbers , your cell, and promise all their social media. When they ask why ? you can tell them its cause daddy has no backbone and put the whole cities health at risk. Hope u get covid bitch"

06/19/2020 at 15:21 hours, Subject: "Still in brookside? "; Message body: "s GT still going to bible study at christ the king? Is your work address still on east [REDACTED]???"

06/19/2020 at 20:36 hours, Subject: "Married to a murderer"; Message body: "History will remember GT as the mayor who let covid take over his city. Fool. Hopefully it will be your family that gets it."

06/20/2020 at 07:30 hours, Subject: "Next time you are in church, please think about how many more people are being exposed to Covid because of you wonderful husband"; Message body: "Then explain to your kids why your husband will go down in history as the 1st mayor in America to allow a large event during a pandemic and the mayor who allowed Covid to take over his city. You should be real proud of him!!! Way to put the health of Tulsa first!!!"

06/20/2020 at 07:32 hours, Subject: "Just tell the Doctors and Nurses in Tulsa to fuck off"; Message body: "Or you could just have a rally. !!! Lololol Fuckin idiot family ! You people deserve covid. Way to make Tulsa better for the children. And you are complacent. Shame on you lady."

06/20/2020 at 07:36 hours, Subject: "Can we say complacent"; Message body: "Very Catholic like Every Dr and Nurse in Tulsa "We are starting to get overwhelmed and our patient counts are dramatically rising. This is not a good time for a rally, fellow doctors and nurses are working tirelessly for Tulsa" GT" HmMMM, I think I am going to invite the largest gathering in America since this whole pandemic started. Ill show covid". Enough said you complacent bitch."

06/20/2020 at 12:08 hours, Subject: "Still on South Florence"; Message body: "You gonna be home later?? Id like to meet!"

06/20/2020 at 13:29 hours, Subject: "6 Trump Campaign Staffers Test Positive. Breaking Reuters"; Message body: "Told ya!!!!!"

11. Messages from e-mail AdamMDonn [REDACTED] to Susan Bynum's law firm email address, and GT Bynum's internal city of Tulsa e-mail address:

06/20/2020 at 09:30 hours, Subject: "Sealed fate: History will remember you as the mayor who invited covid to town."; Message body: "You will forever go down in history as the mayor who welcomed a pandemic with open arms. Give yourself a pat on the back buddy."

06/20/2020 at 11:24 hours, Subject: "Great job spreading Covid in Tulsa"; Message body: "Pat on the back!!!! I hope you are proud of yourself. Congrats on being first mayor to host a large scale crowd. You could say you didnt invite BLM protesters but you sure cant deny inviting 20,000+ people to a rally. Way to go. Im sure Susan and the kids are proud of you!!! WAY TO SPREAD COVID IN TULSA. Go Trump!"

06/20/2020 at 11:28 hours, Subject: "Curfew. Wait no curfew. Ok curfew. No"; Message body: "Let me bend over and see what Trump wants first. Fuck the police Chief. I'm mayor god damnit."

06/20/2020 at 11:35 hours, Subject: "Wish I could hear you explain to [Bynum Son] and [Bynum Daughter] how daddy put Tulsa first"; Message body: "I mean he did put Tulsa first right?? Of course he did, this rally was "an honor" right???"

06/20/2020 at 11:51 hours, Subject: "You are a worse catholic than the pedofile priests";

Message body: "Shame on you and your family"

12. Voice messages sent to Susan Bynum via her law firm website, [REDACTED]. The number they originated from was [REDACTED]

06/19/2020 at 11:18 hours, a voice message was left saying: "crazy bitch your fucking husband is killing people, I hope your fuckin family gets corona virus, fuckin cunt"

06/19/2020 at 11:19 hours, a voice message was left saying: "fucking coward bitch, fuck you"

06/20/2020 at 07:16 hours, a voice message was left saying: "Yes hi good morning Susan, your husband is a murderer, and I hope your family gets covid you fucking bitch, you people deserve it"

06/20/2020 at 07:17 hours, a voice message was left saying: "Here's hoping [Bynum Son] and [Bynum Daughter] get covid, fuckin cunt"

06/20/2020 at 07:20 hours, a voice message was left saying: "Shame on you lady, and you call yourself a catholic, bitch"

06/20/2020 at 10:12 hours, a voice message was left saying: "Why aren't you going to the rally, GT said it was an honor, what the fucks wrong with you lady, you should have there"

06/20/2020 at 10:14 hours, a voice message was left saying: "You deserve covid you fucking cunt"

06/20/2020 at 10:15 hours, a voice message was left saying: "Oh yes, hi good morning to Susan, Fuck you bitch"

06/20/2020 at 10:17 hours, a voice message was left saying: "Hope your real proud of GT"

06/20/2020 at 10:19 hours, a voice message was left saying: "as a cell support for all the doctors and nurses, I think I'll have a rally"

06/20/2020 at 10:44 hours, a voice message was left saying: "The wife of the man who let covid take over Tulsa, you must be so proud of GT"

06/20/2020 at 10:46 hours, a voice message was left saying: "you call yourself a catholic, way to protect the community lady"

06/20/2020 at 12:50 hours, a voice message was left saying: "Hi, yes just conforming that you're still on [REDACTED], um, before I have my guys make their delivery. Uh, if you can call me back when you get a chance, thanks"

06/20/2020 at 17:27 hours, a voice message was left saying: "I like to grab them by the pussy"

13. Not only did the Bynum family receive the messages from above, Susan was notified by coworkers claiming there were inappropriate e-mails being sent by Susan. Susan clarified she had not sent the e-mails. The subject masqueraded as Susan Bynum and sent e-mails to her colleagues via the law firm website. Separate from the messages above, the subject used Susan's law firm's messaging service to deliver emails to her co-workers. This was possible due to how the FDL Law Firm website was constructed to deliver electronic communication to its employees. Someone other than Susan Bynum sent messages to her coworkers disguising the e-mails to appear as if they were coming from her. This was done in order to harass, intimidate, persuade, and threaten Susan and GT Bynum.

14. Messages to Susan Bynum's coworkers through the law firm's website with return email addresses purporting to be from Susan Bynum, including her actual work email account address and a "sbynum [REDACTED]" account that did not belong to her:

06/18/2020 at 11:48 hours; Message: "That bitch is gonna spread Covid."

06/18/2020 at 11:50 hours; Message: "That bitch is gonna infect you all with covid."

06/20/2020 at 08:06 hours; Message: "Your not gonna block me dumbass. Keep trying and Ill crash your whole fucking website. Now send this to susan or ill show up at your office. You are still on 4th street right?? Susan, Hope you are taking [Bynum Son] and [Bynum Daughter] to the rally since its safe and such a great thing for Tulsa !!!! I bet you are proud of yourself. And such a great way to show your support for the doctors and nurses in Tulsa. Maybe you can give them a shoutout at the rally!!!! Most likely they will be in the hospitals treating the surge of patients Tulsa is seeing. Good Job mayor!!!!"

06/20/2020 at 08:07 hours; Message: "Susan not really a good look for your firm."

06/20/2020 at 08:08 hours; Message: "Will thst cunt be in the office monday??"

06/20/2020 at 08:11 hours; Message: "I have covid and Im coming to visit!!!!!"

06/20/2020 at 08:22 hours; Message: "Bitch"

06/20/2020 at 08:23 hours; Message: "Vote Trump!!!"

06/20/2020 at 08:25 hours; Message: "May not be in office monday. GT and I got in an argument. He wont bend over me like he did for Trump."

15. Messages from e-mail AdamMDonn [REDACTED] to Susan Bynum's law firm coworkers:

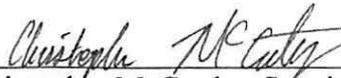
06/19/2020 at 15:49 hours, Subject: "Free Rally Tickets Compliments S. Bynum";

Message body: "Hope everyone is planning to go. Susans wonderful husband is hosting Trump and 20,000 of his followers to Tulsa in the middle of a pandemic. Hope everyone is planning to go and please bring your family !!! GT says its safe!!!! When someone you know gets covid dont forget to drop GT and Susan a thank you note. BTW. Susan is a GREAT look for the firm !!!"

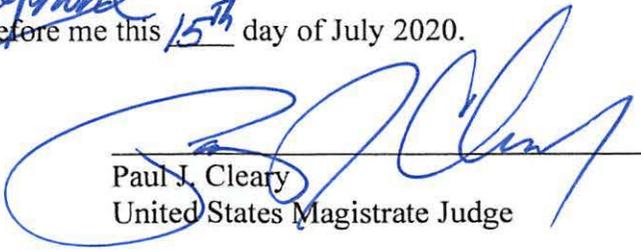
16. From June 11, 2020 to June 22, 2020 the Bynum family received approximately 44 e-mails and 14 voicemail messages. These messages were meant to harass, annoy, threaten, and intimidate GT Bynum and his family. The subject threatened to publish the Bynum family's home address and personal information to the internet, including the children's cell phone numbers and social media accounts. The subject said this with the hope people would encroach upon the Bynum residence with the intention of causing Mayor GT Bynum harm and/or emotional distress. Another example was on June 19, 2020 at 14:58 hours when the subject stated he hoped GT Bynum's family contracted Covid-19, claimed GT Bynum was "spineless", and hoped the Bynum family suffered. The subject asked Susan Bynum if she would be home later so the subject could meet her at her house. Lastly, a voicemail received by Susan from the subject asked if she still lived on South Florence before his guys made a delivery. This is just a sample of the messages above regarding what was sent to the Bynum family.

17. All these messages appeared to be attempts to harass and intimidate Mayor GT Bynum into canceling the presidential rally that was scheduled on June 20, 2020 in Tulsa, OK. by causing him and his family emotional distress.

18. Based on the information set forth above, I believe there is probable cause DONN cyberstalked described herein, and request the Court issue a Complaint and Arrest Warrant for ADAM M. DONN.

  
\_\_\_\_\_  
Christopher McCarthy, Special Agent  
Federal Bureau of Investigation

Sworn and substance to before me this <sup>telephone</sup> 15<sup>th</sup> day of July 2020.

  
\_\_\_\_\_  
Paul J. Cleary  
United States Magistrate Judge