

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Nebraska

SEALED

United States of America)
 v.)
 Abraham Hermosillo Alvarez)
)
)
)
)
)

Case No. 4:26MJ3081

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

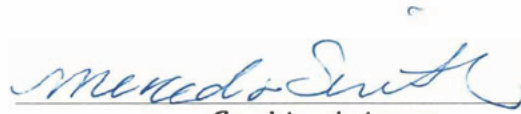
On or about the date(s) of January 2026 to June 14, 2026 in the county of Douglas and Saline in the District of Nebraska, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|---------------------|---|
| 18 USC 1117 | Conspiracy to Murder |
| 18 USC 371 | Conspiracy to Commit an Offense Against the United States |

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.



Complainant's signature

SA Mercedes Smith, FBI

Printed name and title

Sworn to before me and signed in my presence.

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

Date: 6/14/2026



Judge's signature

JAQUELINE M. DELUCA, U.S. Magistrate Judge

Printed name and title

City and state: Lincoln, Nebraska

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Mercedes Johanna Smith, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (hereinafter, “FBI”) and have been since July 2024. I completed a nineteen-week training program at the FBI Academy, which included instruction in the investigation of various criminal offenses governed by federal law, and I have received advanced training in matters relating to criminal investigations. Following graduation from the FBI Academy in Quantico, Virginia. I am currently assigned to Squad 5 (Joint Terrorism Task Force). As part of my duties, I have participated in individuals engaged in domestic terrorism, terrorist activity, and other criminal activities. While conducting investigations, I have assisted with interviews, surveillances, search warrants, and arrest warrants.

2. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. The information contained in this affidavit is either personally known to me, based upon my interview of various witnesses and review of various records and publicly available information, or has been relayed to me by other agents or sworn law enforcement personnel. Because this affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning the investigation. I have only set forth facts to establish probable cause for the charges in the complaint.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 371 (Conspiracy to Commit an

7. The Knox County Sheriff's Office took photos of the equipment acquired by PROPER, which included several boxes of ammunition (estimated by law enforcement to be in the thousands of rounds of ammunition), two plate carriers with AR-style magazines, an AR-style rifle, and a bullpup rifle painted with an American flag. The equipment was turned over voluntarily by the family to law enforcement.

8. At the conclusion of the encounter, PROPER was transported by the Knox County Sheriff's Office to a local hospital where they submitted an application for emergency admission based on [REDACTED].

9. On June 11, 2026, the Knox County Sheriff's Office contacted the FBI as a result of its interactions with PROPER.

Interview with PROPER's Mother

10. Also on June 11, 2026, I contacted PROPER's mother for a telephone interview for additional information. She detailed that PROPER had recently begun interacting with a group online that was comprised of individuals who claimed to be ex-military and Christian-based. She didn't know the name of the group, but they expressed ultra-religious and antigovernment sentiments, specifically citing grievances about government corruption, the handling of the Epstein files, data centers taking up all the water in communities, and other government actions. PROPER's mother detailed that talking with these individuals online has caused PROPER to lean heavily into his religion, and she believed that those individuals were using religion to manipulate and influence her son.

11. In addition to the equipment and firearms PROPER had recently purchased, she stated that she observed him recently engaged in physical training, which she initially thought

was to further his aspirations to join the military or police, but later learned it was related to the online group he was part of.

12. PROPER's mother detailed that the communications with these individuals largely occurred on his cellular device, and she provided a phone number for PROPER. She also stated that she recently observed PROPER researching and mapping locations in the area just northwest of Washington D.C. She stated that she also observed additional images and maps being sent to him from unknown individuals through texts and Discord messages, and she would overhear PROPER talking to these individuals verbally on his phone.

13. When she asked PROPER what he was doing, he said he couldn't tell her exactly what he was doing, but that they were looking at multiple different locations and intended to conduct "recon" as well as "hit and run missions." PROPER's mother believed "hit and run missions" meant conducting shootings and then leaving.

Execution of Search Warrants

14. On June 11, 2026, the FBI, in coordination with the Knox County Sheriff's Office, CPD, and Danville Police Department, executed a local search warrant at the residence of PROPER. While on scene, investigators observed a large quantity of boxes of spent ammunition, rounds of spent cartridge casings (consistent with ammunition having been fired), and other tactical clothing. Investigators also spoke to PROPER's father and grandmother, who stated that PROPER had become more closed off from his family and spent most of his time online speaking to unidentified persons. PROPER's family members also highlighted concerning statements he had made in recent months, such as making sympathetic comments about Adolf Hitler and posting anti-Semitic comments on Facebook.

15. Also on June 11, 2026, a local search warrant was executed on PROPER's Apple iPhone, which the Knox County Sheriff's Office had previously seized to preserve evidence. During a preliminary search of the device, investigators observed chats on Signal groups that laid out detailed plans to conduct an attack in Washington D.C. with several unidentified confederates. In the chat, detailed imagery of the National Capitol Region and maps of the area were shared to a group of which PROPER was a member, highlighting sniper locations, potential drone launch locations, and other detailed tactical planning.

Interview of PROPER

16. On June 11, 2025, investigators conducted an interview with PROPER at the medical facility where he was housed. The interview was consensual and took place in an unlocked room while a case worker was present.

17. During the interview, PROPER admitted to planning with others a coordinated attack against the United States government during the UFC event scheduled to take place on the White House lawn in Washington, D.C., on Sunday, June 14, 2026.

18. According to PROPER, some members of the group who would participate in the attack began communicating with one another in or around March 2026 via a TikTok group called "Vanguard of the Old." The members of the group stated that they wanted to protect the United States, which they believed was headed in the wrong direction. Members of the group believed that the United States needed to be torn down so that it could be rebuilt. Some expressed a desire that people who were involved with Jeffrey Epstein should not govern the country. Members shared information with each other on the TikTok group to show their trustworthiness and commitment to the cause, such as identification documents and videos of their abilities and workouts.

19. Some of the more serious members of the group, including PROPER, moved their communications over to the encrypted communications app Signal. There they planned an attack for the upcoming White House UFC event. PROPER believed many of the group members had prior military experience. The group was broken up into three tiers, with “Tier 1” having to meet physical fitness standards and acquire equipment such as personal body armor and firearms. PROPER admitted to being one of the team leaders.

20. PROPER described the general plan for the attack. All members would leave their homes on Friday or Saturday (June 12 or 13, 2026) to meet up in Fredericksburg, Virginia. PROPER himself was planning to drive, taking his weapons and body armor, including an AR15, all his ammunition, tactical vests, and ballistic plates. He planned to take extra body armor for other members of the group. He also planned to pick up another member of the group on the way who was hoping to acquire a firearm from a friend or his employer. Investigators have identified that individual and believe he lives in West Virginia. PROPER said that although he was not going to the protest in order to shoot people, several other members of the group were intent on violence.

21. According to PROPER, the plan as he knew it was to stage a demonstration on the north side of the White House. While the demonstration was taking place, the group would fly small, unmanned aircraft (i.e. drones) laden with unspecified explosive devices which would detonate over the north side of the UFC arena. When the unmanned aircraft detonated, the intent was to force the crowd attending the UFC event and high value targets (HVTs) to evacuate to the south. PROPER stated that the plan was for members of his group to act as snipers and additional shooters, preferably with long guns, staged at or near the southern evacuation point to conduct shootings of the members of the crowd and HVTs as they fled from the explosive devices which

had just been detonated. The HVTs included both wealthy people and politicians. According to Proper, this attack was designed to “jumpstart” a revolution in the United States.

22. During PROPER’s June 11 interview, he stated that he originally learned of an anti-government protest in Washington, DC after it was advertised on TikTok by a user identified as Shepherd. He further detailed Shepherd directed the actions that would take place during the event and that Shepherd was the primary individual involved with planning. PROPER directly stated that Shepherd was the leader of the group and described him as aggressive in tactical planning. He believed Shepherd was approximately 30 years old and possibly prior military. Finally, PROPER also indicated that Shepherd was the one who created the group’s tier systems.

23. PROPER appeared to identify potential US Congressional targets due to their support for the American Israel Public Affairs Committee (AIPAC), noting donations the members previously received from AIPAC. Proper identified specific politicians that were supportive of Israel, stating “these are the people we’re going to focus on.” Proper included names and photos for US Senator Marsha Blackburn, US Senator Tom Cotton, US Senator Shelley Moore Capito, US Senator Jim Justice, US Representative Carol Miller, US Representative Riley Moore, and WV State Delegate Tristan Leavitt. Proper’s associates also noted hating “billionaires” and “capitalist elites.” It was unclear if Shepherd was involved in these chat messages, but the targeting of US Congressional targets was related to the original plot that PROPER tied to Shepherd.

Information Obtained from PROPER’s Phone Related to ALVAREZ

24. The search of PROPER’s cell phone revealed chats in the Signal app, consistent with much of what PROPER described. In the phone, investigators could see that there was a

primary large chat, consisting of approximately 19 individuals. Additionally, there were smaller chat groups, consisting of approximately 4 or 5 individuals. These smaller chat groups were based on role assignments and locations, such as shooters at one location or shooters at another location. The review of PROPER's cell phone also revealed group members discussing exit, escape and evasion resources for the attack, including the location of a potential "safe house," and also potential exfiltration or escape routes for members of the group after the attack. Some plans indicated that members of the group would travel from the area of the White House to the Potomac River and travel along the river to escape the area.

25. In the Signal chat titled "Hunters," investigators observed a user going by the online moniker Shepherd who appeared to be posting a large portion of the planning information and was providing direction to other members of the chat. The following is a summary of information posted by Sheperd in the chat.

- a. On June 10, 2026, Shepherd posted, "This is the best action I see. Position your teams in the purple dots (counter sniper and drones) Long range (circled area) (great shot) Easy out into the river." This post was accompanied by a map screenshot of the National Capitol Region with areas circled as described.
- b. Shepherd immediately followed up by posting, "They will try to close down the highways stick to meeting near the 495 bridge. Take the river south, there are back roads, you can also take the river." accompanied by another screenshot of the Potomac river.
- c. Shepherd then provided direction for a safe zone and instructed the other members to take back roads or the river down to the "pick up location."
- d. Later that same evening, Shepherd also provided locations in the area for drone launch points and sniper positions. He also instructed members that he believed the Thomas Jefferson memorial offered the cleanest route to exfiltrate from the area.
- e. Also on or about June 10, 2026, other members of the Signal chat asked Shepherd about a "second wave" of the plot. Shepherd replied, "Several factions and militia have been notified. They will be the teeth and the Shepherds. I also sent out a mass call to action to all protest groups, that will bring numbers.

(working on arming them). They will engage when they see the signal. Told them they know will know when they see it.” He further stated, “at the same time, this day, several other ops are happening all at once. Keeps the enemy distracted while we cut the arteries.”

f. Shepherd then detailed that they expected the system to collapse after their attack was carried out and encouraged individuals in the group to seek refuge and stay within their pre-determined tiers. He provided the Hunters Signal chat with a fall back zone of [REDACTED] Cana, VA, 24317.

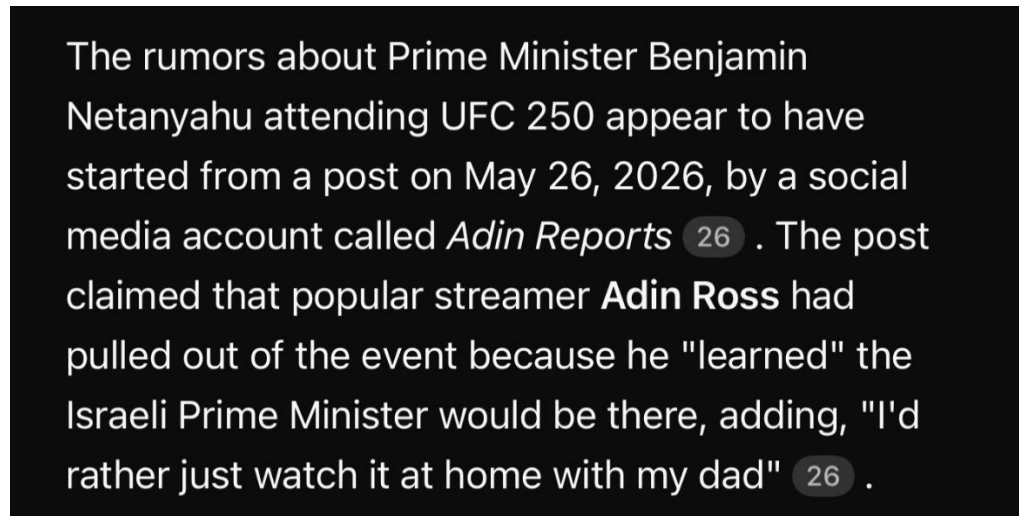
g. Shepherd also provided guidelines for the compartmentalized Signal chats, stating that Lions Den was for members to check-in to designated operations and teams, and stated that each team knows nothing about each others operations.

h. On or about June 11, 2026, Shepherd sent the following screenshot to members of the Hunters chat group:

Shriveledshlong: “Those drones will take more time. However if we’re just rigging explosives I can do small drones quicker”.

Shepherd replied to the above message stating: As many and as deadly as we can get.

Shepherd sent the following screenshot:



Immediately following this screenshot, Shepherd sent the following messages:

- i. Targets confirmed
- ii. 1. 2. VP 3. N 4. Musk

Based on my training and experience, I believe this to mean, “1” was likely identifiable with President Donald Trump; “2” was likely referring to Vice

President JD Vance; “3. N” was likely referencing the above screenshot, referring to Israel Prime Minister Benjamin Netanyahu; and “4. Musk” likely referred to Elon Musk.

Following the above chat, the following messages were shared:

Shepherd: Sniper 1. [unknown emoji]
Sniper 2. [unknown emoji]
Sniper 3. [unknown emoji]
Drone operator: needs to check in
Drones : working on them as we speak
Cake: under development, gathering supplies today and tomorrow

Whiskey_Six: Where we at with the explosives? I’d consider the viability of the mission as a fraction without the drones rigged.

Shepherd: We are waiting in our drone operator, I will start cooking now.

Sheperd: 10-4 [unknown graphic] is ground leader.
3 snipers, 3 different locations.
3-5 drones, I have one so far. [unknown graphic] is making some as we speak.
Our evacuation options are too pricy with our current assets, I can get the 15k.. but it will take time. Not enough.. so we need another out. I’m open to suggestions.. so far we have the cake and drones being worked on today and tomorrow.
[unknown graphic] should be on his way, he can pick up [unknown graphic] and meet with [unknown emoji] and [unknown graphic] at base location to get equipped. From there they will head to DC.
We are working on other evacuation options. As well as reinforced opportunities.

i. On or about June 12, 2026, Shepherd shared the following messages to the Hunters chat group: “They can grow the camp, and make a training ground we have the go ahead from the owner”. “grow your numbers, I will build your teams”. “Train them, fall back location is NE in an old church”. Shepherd then sent the following image:



Identification of ALVAREZ

26. On June 13, 2026, the FBI’s Domestic Terrorism Targeting Unit (DTTU) reviewed Signal posts by Shepherd and identified screenshots from TikTok. One of the accounts, @unitedworldwide444, was followed by several identified subjects related to the plot to attack The White House UFC fight. DTTU also observed that many of the reposted videos and posted material aligned with themes and theories consistent with other identified subjects.

27. Based on the information provided from DTTU, the FBI issued a request for emergency disclosure for @unitedwoldwide444.

28. TikTok responded by providing basic subscriber information for the user, which included a registration IP address of 68.13.158.112 which was registered on October 31, 2025. The IP address registered to the Internet Service Provider Cox Communications.

29. FBI CI subsequently issued a request for emergency disclosure to Cox Communications for IP address 68.13.158.112. Cox Communications responded to the request with subscriber information related to the IP as an E [REDACTED] P [REDACTED], [REDACTED] Omaha, NE 68154.

30. FBI CI conducted research on Puteney and the subscriber address and located a male who also appeared to reside at the address, identified as Abraham Hermosillo Alvarez with a Date of Birth [REDACTED].

31. Based on the above information, the FBI has probable cause to believe Omaha resident Abraham Alvarez (ALVAREZ) is the online user Shepherd.

32. I am aware that a UFC event is scheduled to take place on the lawn of the White House on Sunday, June 14, 2026. I am aware that the President of the United States is scheduled to be in attendance at the event. I am also aware, based on news reports and open-source reporting, that politicians, potentially including members of Congress and Cabinet officials, will likely be at the UFC event.

33. According to employees at a store in Knox County, Ohio, on or about June 5, 2026, PROPER came into the store and purchased a bullpup shotgun. Firearms tracing records from the Bureau of Alcohol, Tobacco, Firearms and Explosives confirmed the purchase.

34. On June 14, 2026, FBI Omaha arrested ALVAREZ.

CONCLUSION

35. Based on the foregoing, there is probable cause to believe that violations of 18 U.S.C. § 371 (Conspiracy to Commit an Offense Against the United States) and 18 U.S.C. § 1117 (Conspiracy to Murder), were committed by ALVAREZ. I therefore respectfully request that a warrant be issued authorizing the arrest of ALVAREZ.

Respectfully submitted,



Mercedes Smith
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on June 14th, 2026



HONORABLE JACQUELINE M. DELUCA
UNITED STATES MAGISTRATE JUDGE