
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ARREST ON OUT-OF-DISTRICT OFFENSE

CASE NUMBER: 26mj00139

The person charged as Jeremy Ryan now appears before this United States District Court for an initial appearance as a result of the following charges having been filed in the United States District Court for the Middle District of Florida with: Transmitting in Interstate Commerce a Threat to Injure, in violation of 18 U.S.C. Section 875(c).

The charging documents and warrant for the arrest of the defendant which was issued by the above United States District Court are attached hereto.

I hereby swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

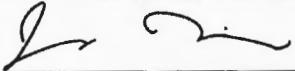
DATED: 1/23/26

Graham King

Graham King
Special Agent
Federal Bureau of Investigation

Reviewed and Approved

Dated: 1/23/26



James Miao
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America

v.

Jeremy Ryan

Case No. 8:23-MJ-375-AET

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 December 11, 2025 in the county of Sarasota in the
Middle District of Florida, the defendant(s) violated:

Code Section

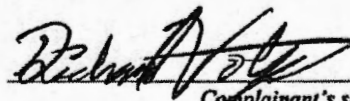
Offense Description

18 U.S.C. § 875(c)

Transmitting in interstate commerce a threat to injure.

This criminal complaint is based on these facts:

Please see attached.

☐ Continued on the attached sheet.


Complainant's signature

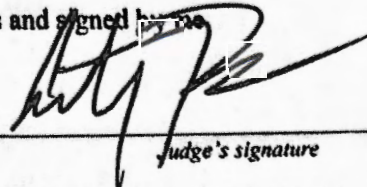
Richard Volp, Special Agent, FBI

Printed name and title

Sworn to before me over the telephone or other reliable electronic means and signed by me
 pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date:

12/22/25



Judge's signature

ANTHONY E. PORCELLI, U.S. Magistrate Judge

Printed name and title

City and state:

Tampa, FL

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Richard A. Volp, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have held this position since September 2017. I am currently assigned to the Tampa Division, Sarasota Resident Agency as a member of the Joint Terrorism Task Force. I have been a sworn law enforcement officer continuously since January 2007. I obtained my Master of Science degree in Criminal Justice from the University of Cincinnati in 2013 and have received specialized criminal investigation training including but not limited to threat assessment and mitigation. During my career as an investigator and supervisor, I have conducted thousands of investigations with varying degrees of complexity, which have resulted in the criminal prosecution of hundreds of subjects at both the federal and state levels. I have served as a principal investigator of a variety of criminal violations including: embezzlement, public corruption, wire fraud, murder, kidnapping, armed robbery, illegal firearms trafficking, cocaine and heroin trafficking, among others.

2. I submit this affidavit in support of a criminal complaint charging Jeremy Ryan ("RYAN") with violations of 18 U.S.C § 875(c) (transmitting in interstate commerce to threat or injure) ("SUBJECT OFFENSE").

3. The facts contained in this affidavit are drawn from my personal knowledge based on my participation in this investigation, information from other criminal investigators, information from agency reports, the review of documents provided to me by witnesses and by law enforcement officers, and information gained through my training and experience.

4. Because this affidavit is submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint, I have not set forth every fact that I learned as the result of this investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause that a violation of federal law has been committed. Unless otherwise noted, all statements of other persons described in this affidavit are set forth in substance and in part, rather than verbatim.

PROBABLE CAUSE

5. On or about December 11, 2025, VICTIM 1 reported their receipt of ongoing threatening communications stemming from a business investment dispute. Ultimately, the FBI became involved and interviewed VICTIM 1 on or about December 15, 2025.

6. VICTIM 1 is president and co-founder of a company that assists in brokering financing deals between other companies.

Message Thread Between VICTIM 1, WITNESS 1, and RYAN

7. On or about October 10, 2025, VICTIM 1's business partner, WITNESS 1, created a group text message chat ("GROUP CHAT") between VICTIM 1, WITNESS 1, and an individual VICTIM 1 knows as "Ryan" (the FBI investigation confirmed the individual VICTIM 1 communicated with to be RYAN). The purpose of the chat thread was to communicate about business ventures in the crypto currency industry. It was common for WITNESS 1 to set up group messages and phone calls with business associates on behalf of VICTIM 1.

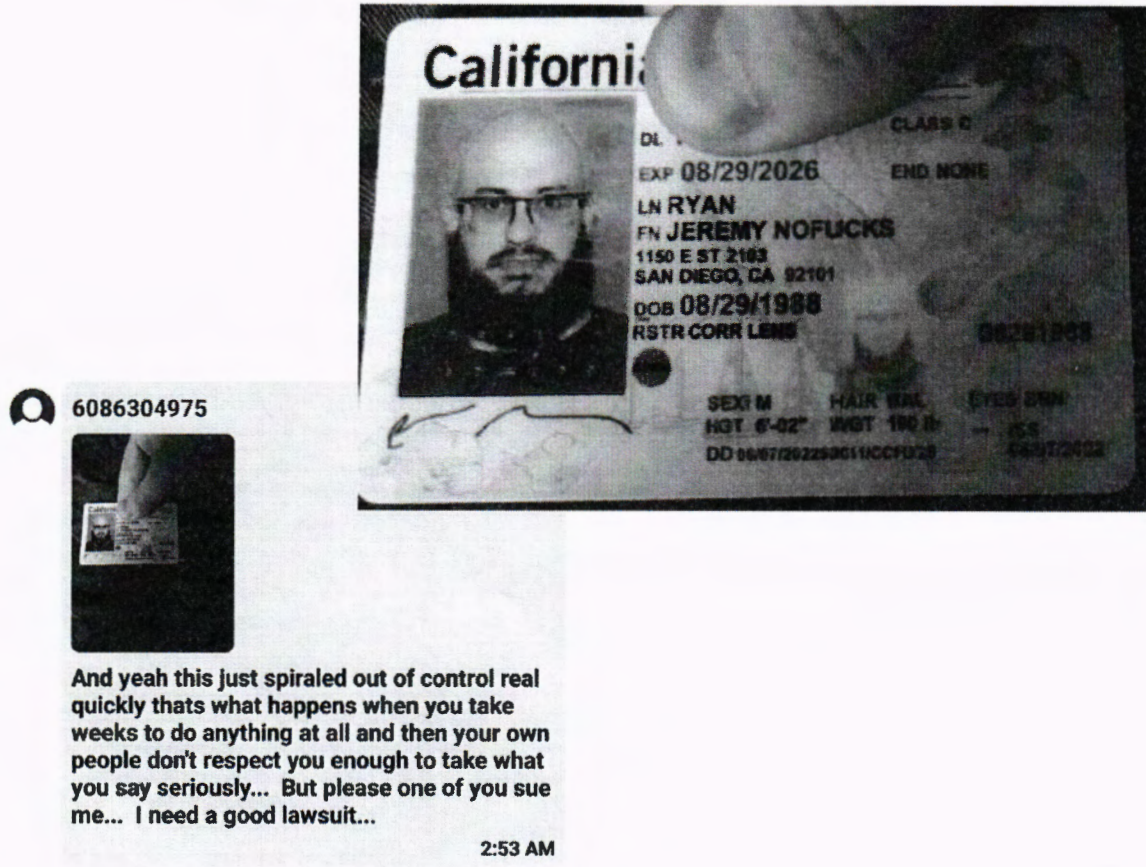
8. Over the next two days, RYAN's demeanor became increasingly aggressive and threatening towards VICTIM 1 and WITNESS 1. In general, RYAN believed VICTIM 1 should have examined the finances better in a recent deal.

9. During the course of their communication, RYAN sent several messages in the GROUP CHAT, which VICTIM 1 perceived as threatening towards him and his family.

10. During the early morning hours of October 13, 2025, RYAN sent a series of unanswered messages to the GROUP CHAT. The following are select examples:

- a. *"I've tried to be nice but the favor hasn't been returned... [VICTIM 1] and [VICTIM 1's wife] got [sic] families... Do you really want me to cross that line?" [1:30AM]*
- b. *"Im [sic] done playing with people who don't take their clear lack of integrity by association seriously... I'll give you 36 hours... If we haven't gotten to the bottom of it by then sorry... But you would have chosen that route...." [1:35AM]*
- c. *"Damn we got [list of 12 names of family members and close associates of VICTIM 1 redacted] And I'm just 5 minutes in... Gonna [sic] make for an awkward family reunion... You got 36 hours to take this seriously or its no longer good faith..." [2:10AM]*
- d. *"Then [WITNESS 1] we got [four names of WITNESS 1's family members redacted] and that's just 5 minutes... [Names of WITNESS 1's minor children] are safe because I don't involve kids in my affairs... But I also don't drop them so 12-15 years from now that calculus may change..." [2:30AM]*
- e. *"You get 72 hours [WITNESS 1]... Because if [VICTIM 1] doesn't have the respect for you to have set something up by now then that says a lot... But if after 36 hours he doesn't and you don't fire him within 36 hours then now you and him are one..." [2:34AM]*

f. RYAN sent a photo of his California driver's license with the following message:



11. I know through my experience that “Nofucks” is slang used to convey that a person does not care about the repercussions or consequences of their actions. It is reasonable to conclude displaying this prominently to VICTIM 1 conveys to him that RYAN does not have regard to the threats or harm he may cause. RYAN legally had his middle named changed in the state of California.

12. Neither VICTIM 1 or WITNESS 1 had ever provided the names of their family members, nor did they otherwise mention their family members to RYAN.

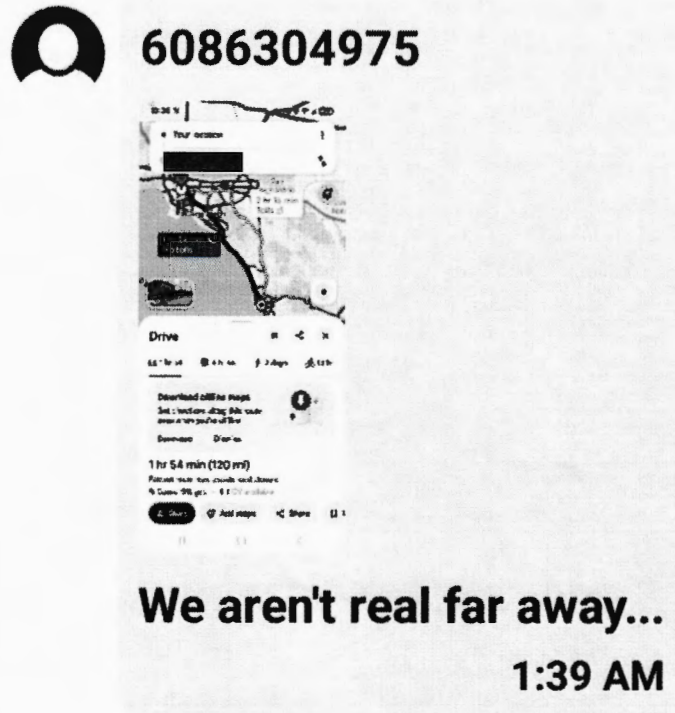
Accordingly, it appears that RYAN independently took steps to obtain this information in order to threaten and intimidate them.

13. During the early morning hours of October 17, 2025, RYAN sent a series of messages to the GROUP CHAT that appeared were meant to threaten and intimidate VICTIM 1. The following are a select example of these messages:

- a. *"This has now become a much larger issue and [VICTIM 1] made that choice deliberately..." [1:14AM]*
- b. *"So theres [sic] only two options to absolve DNA... Option 1 fire [VICTIM 1] and send a message to all the investors and allow a pull out... Option 2... Well nobody wants option 2 as much as [VICTIM 1] wants to provoke it..." [1:16AM]*
- c. *"Real fucking silent now aren't you [VICTIM 1]?" [1:17AM]*
- d. *"Just realize [VICTIM 1] that as I drag [Name of third-party company] through the mud as I'm very well known for doing your name will be permanently tied to assisting that scam... [WITNESS 1] has some time to show me he means what he says but youve [sic] shown enough... You're done... I don't fight with violence but I guarantee looking back youll [sic] wish I did... Its over..." [1:30AM]*
- e. *"And I rescind my apologies for attacking your family and guarantee every family and friend you or your wife have will feel the heat but you chose this..." [1:31AM]*
- f. *"Thats [sic] the reason I don't use violence... Death is too easy... You're gonna have to live with what you did you bitch ass piece of shit..." [1:32AM]*

14. At 1:39AM, RYAN sent a map showing RYAN's location in San Diego to a specific address previously belonging to VICTIM 1 in Los Angeles with the caption, "We

aren't real far away..." VICTIM 1 felt this was a way of intimidating him and showing how closely they lived to one another.



- a. Following this RYAN said, *"Let me give you a little context since you're now too bitch to respond... The DOJ in LA did a massive arrest of what they said was the biggest crips (rolling 60s) in the city for decades... The alleged 2nd in command was Luce Cannon... <https://www.justice.gov/usao-cdca/pr/long-time-rollin-60s-neighborhood-crips-leader-charged-43-count-indictment-alleging> But given as i like to back my shit up look up the 100 something people he follows on his Instagram (@itslucecannon) (versus the million plus that follow him)... Oh shit there's nftdemon420... Wonder who the fuck that is wait is that me?"* [1:48 AM] Law enforcement records indicate the Instagram account "nftdemon420" is

associated with RYAN in addition to VICTIM 1 knowing it belonged to RYAN.

- b. *"I said i [sic] don't fight with violence I never said nor can control what other people do once I drop your name as a dirty rotten scammer..." [1:50 AM]*
- c. *"You were super responsive until you got caught supporting scammers just to spite me because I wanted information that was against your best interest to provide...Now if you know whats [sic] best for you you'll look over your shoulder at all times (while i [sic] aggressively attack your family) and you chose that..." [1:53AM]*
- d. RYAN sent a photo of himself with the caption, *"Remember this face [VICTIM 1] because I guarantee it will give you nightmares months from now!" [2:18 AM]*

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Remember this face [REDACTED] because I guarantee it will give you nightmares months from now!

2:18 AM

- e. *"Pray to whatever deity you do its not gonna [sic] help you... Then text every member of you and your wife's family and every public associate and explain you fucked up now all your lives are about ot get fucked up..." [2:24AM]*

15. Upon waking up and discovering the series of threatening messages, VICTIM 1 notified RYAN that it was unacceptable to talk about his family and he would no longer be engaging in the conversation. VICTIM 1 suggested he would pass information through WITNESS 1.

Message Thread Between WITNESS 1 and RYAN

16. Between on or about October 17, 2025, and continuing into December 2025, RYAN sent threatening and extortive messages to WITNESS 1 directed at both VICTIM 1 and WITNESS 1. This was during the time period where VICTIM 1 ceased communication with RYAN, and WITNESS 1 was acting as an intermediary between the two. The following messages were sent by RYAN to WITNESS 1, in reference to VICTIM 1:

- a. *"I'll give you 12 hours (since he shat on me too) to give one reason why I shouldn't fuck up him and his family."* [10/17/2025 at 12:51AM]
- b. *"This isn't a fucking game to me [WITNESS 1] and I want you to believe it isn't you either but not its gone to such an extremity you gotta [sic] show me you chose the wrong people and understand that..."* [10/17/2025 at 12:52AM]
- c. *"You have 12 hours but I'm done with him... I don't have anyone killed but I guarantee he will wish I did... You have to disassociate with him entirely now it's the only way you don't get roped in..."* [10/17/2025 at 3:43AM]
- d. *"I won't call a hit on him death is too easy but I guarantee he will wish I did... You still have a way out... He doesn't..."* [10/17/2025 at 3:43AM]

17. Following this exchange, RYAN made various extortion threats to WITNESS 1 directed at VICTIM 1:

a. *"You got [sic] 30 days to clean house at [VICTIM1 and WITNESS 1's company] or I will..."* [11/06/2025 at 2:18AM]

b. *"You only have one play now... Admit to what I am saying, fire [VICTIM 1], and make some sort of extreme measure to show why it won't happen again... That's your only play..."* [11/10/2025 at 3:24AM]

18. On December 2, 2025, RYAN texted WITNESS 1 saying, *"Things just go downhill from here on out now that this has turned adversarial... And you gotta [sic] be ready to abandon the people who got you here ... Otherwise you will die a screaming ass piece of shit like the rest of your team... I can guarantee you that..."*

19. On December 3, 2025, RYAN wrote, *"You need to do some deep thinking on how to proceed... Nonetheless I will hunt you down for years to come if you continue down your current path... With your current crew... I guarantee that whenever your time comes and you cant puffer yourself up and lie to anyone that you will look back on this moment and wonder why, after you had more than enough money to turn around, you decided to die a scamming ass shitbag surrounded by scamming ass shitbags all who history will forget..."*

Continued Harassment and Extortion

20. RYAN had previously threatened to harm VICTIM 1 and WITNESS 1's reputations if his demands were not met to include VICTIM 1 being fired. Starting in late November 2025, RYAN appeared to follow through with those threats.

21. On December 2, 2025, RYAN posted an article he wrote on PatrolCrypto.com which alleges that both VICTIM 1 and WITNESS 1 were involved in illegal activity. RYAN allegedly then shared this more than a dozen times on social media.

Identification of Jeremy Ryan and Connection to the Middle District of Florida

22. RYAN used telephone number 608-XXX-4875 to send and receive text messages between VICTIM 1 and WITNESS 1. This telephone number is associated with RYAN through previous law enforcement records in addition to credit report records.

23. In the GROUP CHAT, RYAN stated he lives in San Diego, [California]. In that same text thread, he sent a photo of his California driver's license which contains a photo of himself and his name.

24. He later sends a picture of himself to the group when he tells them to remember his face. The person in the photo visually resembles the known driver's license photo of RYAN.

25. At the time of sending the messages, RYAN stated he was in San Diego, [California] while VICTIM 1 lives, and was physically located, within the Middle District of Florida.

26. RYAN's actions have left VICTIM 1 in fear and worried for the safety of him and his family. VICTIM 1 has altered his daily routines due to his fear. VICTIM 1 believes RYAN will cause him and/or his family harm. VICTIM 1's family has also expressed fear of RYAN and concern for what he may do to them.

Threats and Extortion Attempts Made by RYAN

27. From my training and experience, I know that 18 U.S.C. § 875(c) prohibits the transmitting in interstate or foreign commerce any communication containing any threat to injure the person of another. I also know that to not infringe on the First Amendment, the threat must be a "true threat," which is a serious threat—not idle talk, a careless remark, or something said jokingly—that is made under circumstance that would place a reasonable

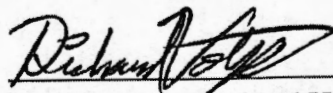
person in fear of being injured or in fear of another person being injured. Whether the speaker is aware of, and intends to convey, the threatening aspect of the message is not part of what makes a statement a threat; the existence of a threat depends on what the statement conveys to the recipient of the message. Yet, the First Amendment still demands a subjective mental-state of at least recklessness.

28. Based on my training, experience, and knowledge of the investigation, I have probable cause to believe that RYAN's posts made true threats, in violation of 18 U.S.C. § 875(c). I have probable cause to believe that RYAN acted at least recklessly and was aware that others could regard his statements as threatening violence when he sent them to VICTIM 1 and WITNESS 1, and his statements would place a reasonable person in fear of being injured, or in fear of another person being injured.

CONCLUSION

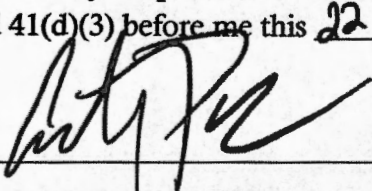
29. Based on the foregoing information, I respectfully submit that probable cause exists to believe that RYAN violated 18 U.S.C. § 875(c) (transmitting in interstate commerce a threat to injure). Accordingly, I request issuance of the proposed Complaint and Arrest Warrant.

Respectfully submitted,



Special Agent Richard Volp
Federal Bureau of Investigation

Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by telephone or other reliable electronic means consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) before me this 22 day of December 2025.



HONORABLE ANTHONY E. PORCELLI
United States Magistrate Judge