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11:23 am, Jan 28 2022

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ Deputy

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

SCOTT RYAN MERRYMAN,

Defendant

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CASE NO. 22-310-ADC

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

Your Affiant, Lisa Koerber, being duly sworn, deposes and states the following:

Introduction and Agent Background

1. Your Affiant is an investigative or law enforcement officer of the United States, within the meaning of 18 U.S.C. § 2510(7) who is empowered by law to conduct investigations and to make arrests for, offenses enumerated in 18 U.S.C. § 2516. I have been employed as a Special Agent with the United States Secret Service for approximately 16.5 years. In the performance of my duties as a Special Agent with the Secret Service, I have led, conducted, and participated in the protection of The President of the United States, and conducted investigations pertaining to violation of federal laws involving threats to government officials, financial institution fraud, identity theft, and protective intelligence cases.

2. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of a complaint and arrest warrant, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause. The information contained in this

affidavit is based upon my personal knowledge, my review of documents and other evidence, and my conversations with other law enforcement officers and other individuals. All conversations and statements described in this affidavit are related in substance and in part unless otherwise indicated.

3. Your Affiant respectfully submits that, based on the facts set forth herein, there is probable cause to believe that on or about January 26, 2022 and January 27, 2022, **SCOTT RYAN MERRYMAN** (“**MERRYMAN**”), committed violations of 18 U.S.C. § 871 (Threats Against the President of the United States) and 18 U.S.C. § 875(c) (Interstate Communication Containing a Threat to Harm).

Probable Cause

4. On January 26, 2022, Special Agent/Senior Resident Agent (“SRA”) Greg Tiano, USSS/Wichita, Kansas, notified the Secret Service’s Protective Intelligence and Assessment Division (“PID”) of the following incident:

a. On January 25, 2022, **MERRYMAN** telephonically told officers of the Independence, KS Police Department that he was en route to Washington, DC to see the President.

b. On January 26, 2022, SRA Tiano conducted a telephonic interview with **MERRYMAN**. During the interview, **MERRYMAN** stated that he had been told by God to travel to Washington, DC to “lop of the head of the serpent in the heart of the nation.” **MERRYMAN** denied that the serpent was the President of the United States, but stated that he had information about the Book of Revelation that he was being instructed by God to give to the President. **MERRYMAN** was interviewed twice by SRA Tiano on January 26th, and affirmed during the second interview that he had every intention of attempting to “speak” with President Biden or anyone who would listen at the White House.

5. On January 26, 2022, your Affiant and Secret Service Special Agent Tim Hackler located and interviewed **MERRYMAN** in the parking lot of the Cracker Barrel, located at 18214 Col. Henry K. Douglas Drive, Hagerstown, Maryland. **MERRYMAN** stated he was heading to Washington, DC to “cut the head off the snake in the heart of the nation.” **MERRYMAN** stated the snake was Lucifer and/or the devil, and denied the comment was a threat towards the President and/or another USSS protectee at that time. When specifically questioned on why he was heading to the White House, **MERRYMAN** advised he had to deliver a message to President Biden, and advise him that people were fed up with the divisiveness in the country and to turn back to God (or go to hell). **MERRYMAN** made numerous comments about God, being guided by God, cloaked in the “blood of the lamb,” and armored by God.

6. Special Agent Hackler conducted a consent search of **MERRYMAN** and no weapons were found; however, **MERRYMAN** did have a loaded magazine on his person (containing 3 rounds of .45 ammunition), and a spotting scope in his backpack.¹ When asked about the ammunition, **MERRYMAN** claimed God told him to bring it and offered no other explanation. **MERRYMAN** denied currently possessing a weapon, advised the rounds belonged to a Ruger 1911, and claimed he no longer had the weapon (but refused to clarify the exact whereabouts of the weapon).

7. Later on January 26, 2022, SRA Tiano received a phone call from **MERRYMAN** on his USSS-issued cellular phone. **MERRYMAN** stated he had finished speaking with the Agents (referring to your Affiant and Special Agent Hackler) that SRA Tiano “had sent for him and that they had given him the answer.” **MERRYMAN** stated that they had told him “not to take

¹ A spotting scope is akin to a small telescope that is designed for use with a tripod. **MERRYMAN** stated that the purpose of the spotting scope was for “doing recon.”

the bullets to the White House” then stated, multiple times, “I’m coming for you bitch.” During the course of the conversation, **MERRYMAN** also stated, “Well, I have a bullet with your name on it” and “I’m coming for you bitch, I’m coming to cut the head off the serpent in the heart of America.” SRA Tiano asked **MERRYMAN** if he was threatening a federal agent, and **MERRYMAN** stated, “yes I am.”

8. From January 25, 2022 through January 27, 2022, **MERRYMAN** has posted on Facebook (facebook.com/scottie.merryman) a series of increasingly threatening verbiage.² See below six screenshots (pasted in order from oldest to newest):

a. January 25, 2022 at approximately 9:35 a.m. EST:



² This Facebook account is “linked” to a Facebook account for a company named 508th Construction. A photo of **MERRYMAN** can be seen on the Facebook page for 508th Construction, and **MERRYMAN** is listed as the owner and operator of 508th Construction on the facebook.com/scottie.merryman Facebook account. The address listed for 508th Construction is the same as **MERRYMAN**’s home address. Also, the telephone number listed for 508th Construction is the same telephone number **MERRYMAN** used to call SRA Tiano and the White House Switchboard, discussed later in this affidavit.

b. January 26, 2022, at approximately 7:41 p.m. EST:



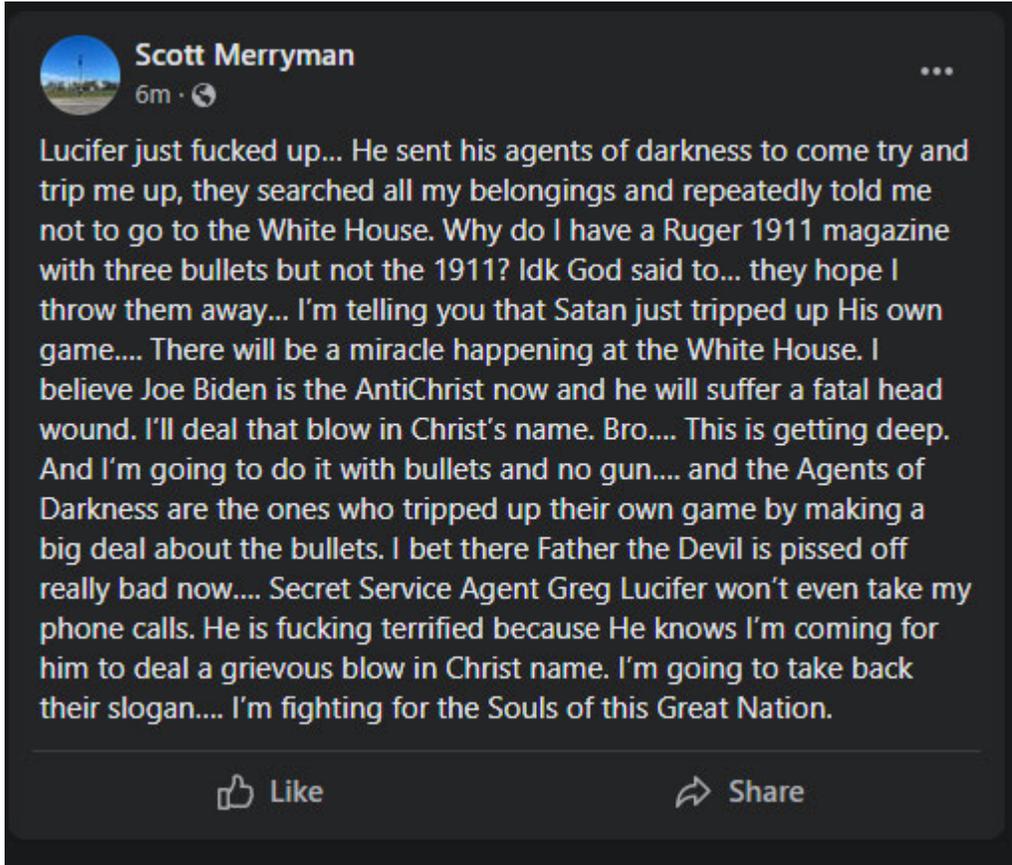
A screenshot of a Facebook post by Scott Merryman. The post is on a dark background. At the top left is a circular profile picture of a person. To the right of the picture is the name "Scott Merryman" in white text. Below the name is "12h" and a globe icon. In the top right corner of the post area are three white dots. The main text of the post is in white and reads: "One more thing... the great liar is the Secret Service Agent Greg... Ummm. Last name? Lucifer. He won't allow me to share my location with Him and he lies he is a saint, he lies saying to go away from there. I talked to devil on the phone y'all... and I told him what's up. I'm going to go lop the wicked old serpents head off with my razor sharp double edged long sword... I will not be phased by him until the day I prophesy of my death on because he has his day with me when he is able to kill me on 13 June 2025 but till then buddy I'm coming for you. The great deceiver is going down! They're fighting for the soul of America??? Yeah, to take you straight to the pits of Hell. I'll stand in the gap and do the Lord's work on Earth as it is in Heaven. I need prayers for a place to sleep tonight that is warm, and a way to get the remaining hour and a half to Washington DC, but other than that I'm covered in the blood of The Perfect Lamb that was shed for you and me and all of us, but few accept. I love you all. Blessings from the Heavenlies on you faithful saints. We're winning and I'll show you how. Come fight and follow me if you're lead to do it!!! We're untouchable in Christ name." At the bottom left of the post is a blue thumbs-up icon followed by the number "11". At the bottom right is the text "5 Comments".

Scott Merryman
12h · 🌐

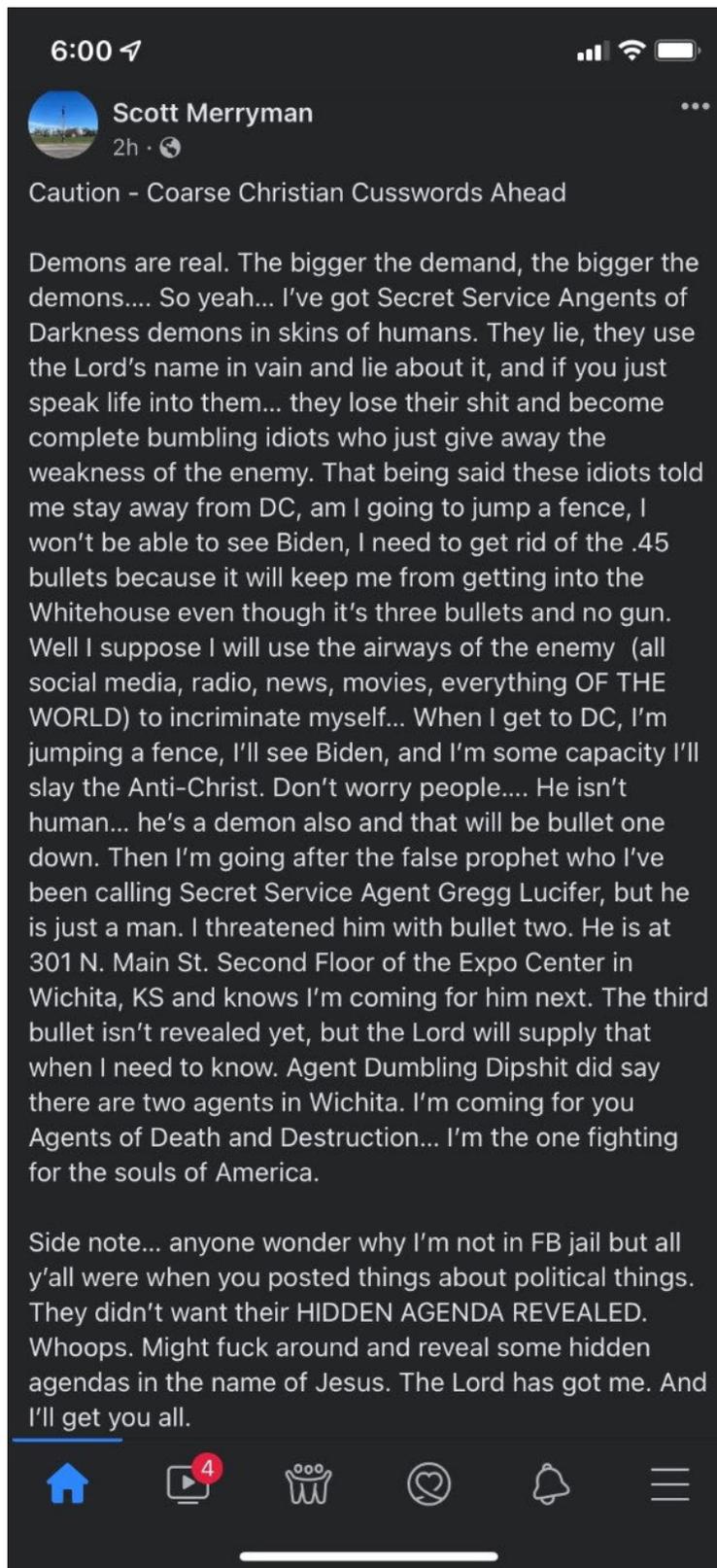
One more thing... the great liar is the Secret Service Agent Greg... Ummm. Last name? Lucifer. He won't allow me to share my location with Him and he lies he is a saint, he lies saying to go away from there. I talked to devil on the phone y'all... and I told him what's up. I'm going to go lop the wicked old serpents head off with my razor sharp double edged long sword... I will not be phased by him until the day I prophesy of my death on because he has his day with me when he is able to kill me on 13 June 2025 but till then buddy I'm coming for you. The great deceiver is going down! They're fighting for the soul of America??? Yeah, to take you straight to the pits of Hell. I'll stand in the gap and do the Lord's work on Earth as it is in Heaven. I need prayers for a place to sleep tonight that is warm, and a way to get the remaining hour and a half to Washington DC, but other than that I'm covered in the blood of The Perfect Lamb that was shed for you and me and all of us, but few accept. I love you all. Blessings from the Heavenlies on you faithful saints. We're winning and I'll show you how. Come fight and follow me if you're lead to do it!!! We're untouchable in Christ name.

👍 11 5 Comments

c. January 26, 2022, at approximately 11:54 p.m. EST?



d. January 27, 2022 (subsequently deleted):



f. January 27, 2022 (subsequently deleted):



9. On January 27, 2022, at approximately 11:23 a.m., **MERRYMAN** contacted the White House (WH) Switchboard, and made threats against the President. **MERRYMAN** stated

he was “coming to the White House, and was going to cut off the head of the snake/anti-Christ.” According to WH Switchboard records, **MERRYMAN** used the same telephone number he used when he contacted SRA Tiano. The WH Operator then contacted the Secret Service’s PID and advised Special Agent James Macdonald that **MERRYMAN** made a threat towards the President.

10. Special Agent Macdonald spoke with **MERRYMAN**. During that conversation, **MERRYMAN** made the following statements:

- a. “I’m coming for his bitch ass sleepy Joe. I’m talking about President Biden and you can quote me.”
- b. “I’m coming with three bullets no guns. I am now coming by myself.”
- c. “You got two minutes, and then I’m coming...”
- d. “You know where I’m staying bitch! I’m in Hagerstown, Maryland at the (unintelligible).”
- e. “That’s it! You’re dead!”

Conclusion

11. Based on the forgoing, probable cause exists that **MERRYMAN** violated 18 U.S.C. § 871 and 18 U.S.C. § 875(c). Accordingly, your Affiant requests that the Court authorize a complaint and arrest warrant for **MERRYMAN**.

Lisa Koerber

Lisa Koerber
Senior Special Agent
United States Secret Service

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4(d) this 28th day of January, 2022.

A. David Copperthite

HONORABLE A. DAVID COPPERTHITE
UNITED STATES MAGISTRATE JUDGE