

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Honorable Leda D. Wettre
	:	
v.	:	Mag. No. 24-13275
	:	
HAIM BRAVERMAN	:	CRIMINAL COMPLAINT
	:	

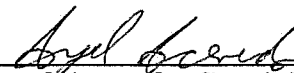
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent of the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



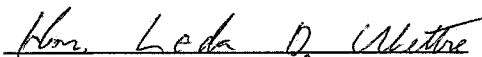
Angel Acevedo, Special Agent
Federal Bureau of Investigation

Special Agent Acevedo attested to this affidavit by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A).

October 25, 2024 at 2:30 pm
Date

Newark, New Jersey
City and State

HONORABLE LEDA D. WETTRE
United States Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A

Count One

(Transmitting Threats in Interstate and Foreign Commerce)

On or about September 10, 2024, in the District of New Jersey and elsewhere,
defendant

HAIM BRAVERMAN

knowingly transmitted in interstate and foreign commerce communications
containing threats to injure the person of another.

In violation of Title 18, United States Code, Section 875(c).

ATTACHMENT B

I, Angel Acevedo, am a Special Agent with the Federal Bureau of Investigation (“FBI”). I am fully familiar with the facts set forth herein based upon briefings with other law enforcement officers. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have only set forth facts that I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part. Dates of events are asserted as having occurred on or about the asserted date.

1. Since at least in or around October 2023, defendant Haim Braverman (“BRAVERMAN”), has been using a messaging application (“Messaging Application”)¹ and a social media platform (“Social Media Platform”).²

2. On or about October 30, 2023, an individual, who was later determined to be BRAVERMAN, started a group chat called “Real Jewish” (“Real Jewish Group Chat”) in the Messaging Application.

3. In the Messaging Application, BRAVERMAN used the name “Hy,” and was associated with phone number +1*****9110 (“9110 Number”). BRAVERMAN described the Real Jewish Group Chat as: “Jewish and non-Jewish of all backgrounds welcome. No censorship. Express yourself.” BRAVERMAN subsequently changed the name of the Group to “The Real Jewish Support” and later to “The Real Jewish Defense,” before reverting the Group’s name back to “Real Jewish.”

4. Law enforcement’s investigation revealed that the 9110 Number was associated with BRAVERMAN. The investigation further revealed that the individual using the 9110 Number in the Messaging Application was associated with the email address hybraverman***@gmail.com (“Hy Braverman Email Account”).

¹ The Messaging Application provides an Internet-based multimedia messaging service, via a cross-platform smartphone application that enables users to communicate with each other via text, voice, and video. Users can also exchange recorded audio and video messages, photos and other files, and their location. Each account on the Messaging Application has a unique account identifier in the form of a verified telephone number. The Messaging Application operates in interstate and foreign commerce.

² The Social Media Platform is a free-access social networking service, accessible through its website and its mobile application, that allows subscribers to acquire and use accounts through which users can share messages, multimedia, and other information with other users and the general public. Each user has a profile page where certain content they create and share can be viewed either by the general public or only the user’s followers, depending on privacy settings. Users can upload photos, videos, or audio taken with or stored on their devices. The Social Media Platform operates in interstate and foreign commerce.

5. As of September 20, 2024, the Real Jewish Group Chat had approximately 40 members with several, including BRAVERMAN, acting as group administrators.

6. On or about November 10, 2023, BRAVERMAN wrote the following in the Messaging Application: “Please note we will be discussing weapons. Please leave if this upsets you[.]”

7. On or about November 10, 2023, BRAVERMAN also wrote the following in the Messaging Application, referencing violent acts such as using a steel bat to crush an individual’s skull:

So I had this idea I will not execute on but after seeing these huge NYC protests.. I wanted to dress up with a rag on my head and a flag.

I want[e]d to get a small quick release bottle of butane, and a mini torch, and rapidly torch every single Palestinian flag on the street[.]

[. . .] then fill a poind [sic] of butane in the middle of the road and burn a huge photo of Mohammed[.]

set their whole block on fire[.]

I won’t do it.. but I did think about if I saw someone take a hostage photo down on a stre[e]t post i’d slam their forehead into the steel[.]

two at once[.]

I tyhought [sic] it was a girl i’d take packing tape and wrap her hair around the pole with it[.]

[. . .] **my f[a]vorite would [be] to bring my brooklyn crusher steel bat and behind the person cursh [sic] their skull[.]**

or follow them into the intersection, tackle and slam forehead into pavement[.]

i wont do it. but no ones doing anything[.]

[Emphasis added.]

8. On or about November 11, 2023, a user on the Social Media Platform, operating the handle “wesee***” (“SMP handle-1”), later determined to be BRAVERMAN, posted a video of himself on the Social Media Platform, referencing a steel bat and stating, in relevant part:

How would you like a fucking steel bat shoved into your fucking skull? Cause that what’s gonna fucking come to you. These little fucking kids . . . the bottom line is that times come bitch. If I fucking encounter any of those fucks that want to deny whatever, there’s gonna be a fucking fight and [unintelligible] gonna be a blood bath, I’ll tell ya because me and my boys will fucking destroy your motherfucking ass, cocksucker! . . . To those fucking LGBTQ f**ks, younger fucks mostly, who stand with Gaza and calls us oppressors. . . You’re gonna see what’s gonna come to you, you’re gonna fucking see.

[Emphasis added.]

9. In or around November 2023, BRAVERMAN applied for a firearms license in the State of New Jersey. On or about November 12, 2023, BRAVERMAN wrote in the Messaging Application: “Firearm permit this week[.]” BRAVERMAN was later denied the firearms license due to a disclosure in his application.

10. On or about November 12, 2023, BRAVERMAN posted photos in the Messaging Application. The photos included a photo of a black steel bat labeled “Brooklyn Crusher,” four knives including a machete-style knife, a stun gun, and what appeared to be pepper spray or mace:



11. BRAVERMAN then wrote:

Title: Close combat collection. The two Smith and Wesson smaller knives are kept in different parts of my body if one hand is held. The sabre [sic] stun gun is in its own separate pocket.

12. On or about May 11, 2024, local law enforcement visited BRAVERMAN's residence to interview him. BRAVERMAN allowed law enforcement to enter his residence, where officers observed a stun gun, knives, a machete-style knife, and a black steel baseball bat near the entrance to the residence.

The September 10, 2024 Social Media Posts and Audio Message

13. On or about September 10, 2024, a user on the Social Media Platform, operating the handle "hy*****" ("SMP handle-2") later determined to be BRAVERMAN, posted a video of himself on the Social Media Platform, referencing an individual by name ("Individual-1"). Individual-1 was a political commentator who had publicly discussed a prominent, now-deceased rabbi (the "Rabbi"), who led a branch of Orthodox Judaism.

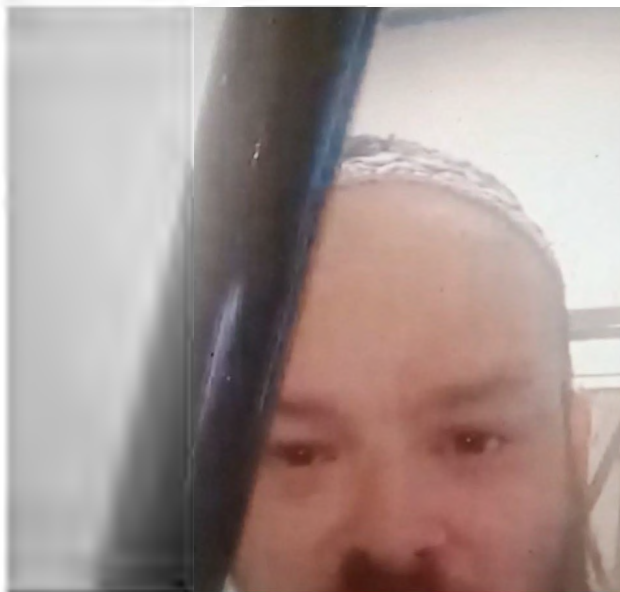
14. In the video, BRAVERMAN appeared to be looking in the direction of a photo, which was believed to be a photo of the Rabbi. BRAVERMAN later showed the photo in the video, and BRAVERMAN referenced using a bat against Individual-1, stating, in relevant part:

[Individual-1] said something about him that is the most disgraceful thing to an old man who to his dying day stood up and listened to people and the divinity of who he is is the reason why I have him hanging up in my house . . . You'll get what's coming to you . . . **[Individual-1], I've never met someone . . . if I could f**king kill you right now, I would not even . . ., f**k it I'll give you the steel bat. I wouldn't even stop. I'd kill you. Dead. [The Social Media Platform], I'm threatening a death sentence against [Individual-1].**

[Emphasis added.]

15. While stating “if I could f**king kill you right now, I would not even . . .,” BRAVERMAN appeared to hold a bat upright in his hand. He then dropped that bat and held a different bat upright in his hand while stating: “f**k it I'll give you the steel bat. I wouldn't even stop.”

16. Below is an image taken from the video:



17. BRAVERMAN's post also included a written comment from BRAVERMAN. BRAVERMAN wrote: “[Individual-1] needs to be killed.”

18. Law enforcement's investigation revealed that SMP handle-2 was associated with the name “Hy Eliyahu,” and the 9110 Number.

19. On or about that same date, BRAVERMAN also sent an audio message in the Messaging Application discussing Individual-1 by name. In the audio recording, BRAVERMAN stated, in relevant part: “[Individual-1] decided to go ape sh*t on . . . [the Rabbi] . . . claiming that he . . . created some sort of cult[.]”

20. BRAVERMAN then stated, in relevant part: “After I heard what. . . she said, I will go to prison, gladly find her and kill her. . . I will find a f**king weapon and f**king kill her. I am outraged.”