

UNITED STATES DISTRICT COURT
for the
District of New Hampshire

United States of America
v.
Tyler Anderson

Case No.
1:23-mj- 225-01-AJ

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 8, 2023 in the county of Strafford in the
District of New Hampshire, the defendant(s) violated:

Code Section 18 U.S.C. § 875(c) Offense Description Interstate Threats to Injure the Person of Another

This criminal complaint is based on these facts:

Please see the attached affidavit.

Continued on the attached sheet.

/s/Adam Howe

Complainant's signature

Special Agent Adam Howe, FBI

Printed name and title

The affiant appeared before me by telephonic conference on this date pursuant to Fed. R. Crim P. 4.1 and affirmed under oath the content of this complaint and affidavit.

Date: Dec 9, 2023

Andrea K. Johnstone



Judge's signature

City and state: Concord, New Hampshire

Andrea K. Johnstone, U.S Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Adam Howe, being first duly sworn, hereby depose and state as follows:

Introduction

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I am currently assigned to the Boston Field Office, Bedford, New Hampshire Resident Agency. I am on a squad that investigates National Security matters and have been assigned to this squad since June 2023. I have been a Special Agent since June 2014.

2. The following information is based on my observations during the course of this investigation, my training and experience, and information supplied to me by other law enforcement personnel, including other FBI agents and the Portsmouth Police Department. The purpose of this affidavit is limited to showing that probable cause exists that on or about December 8, 2023, TYLER ANDERSON (ANDERSON) violated Title 18 United States Code (U.S.C.) § 875(c). Accordingly, while this affidavit contains all the material information I am aware of that is pertinent to the requested criminal complaint, it does not include each and every fact known by me or other investigators concerning the investigation.

Relevant Statute

3. Title 18, United States Code, Section 875 provides, in pertinent part:

Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.

18 U.S.C. § 875(c).

Probable Cause

4. Based on my review of publicly available information, I know that a presidential

candidate (the “Candidate”) is scheduled to hold a campaign event in Portsmouth, New Hampshire, on December 11, 2023.

5. According to a member of the Candidate’s campaign staff, in advance of the event the campaign sends text messages notifying voters about the event. One of the phone numbers used to send these text messages is 207- [REDACTED].

6. A member of the Candidate’s campaign staff provided the Portsmouth Police Department the following messages sent to voters on December 8, 2023:

Hi this is [Name Redacted] with [the Candidate’s] campaign

[The Candidate] will be visiting [Address Redacted] Portsmouth, NH on Mon Dec 11 at 8:30AM.

Come & Meet [the Candidate] and enjoy a buffet Style breakfast will be served, FREE and open to the public. RSVP here: [Website Redacted]

Reply Stop to Stop

7. The Candidate’s campaign staff also provided two replies to the above message, they received at approximately 10:06am. These messages were sent from phone number 603- [REDACTED]. The first message stated:

Great, another opportunity for me to blow [the Candidate’s] brains out!

8. The second message stated:

I’m going to kill everyone who attends and then fuck their corpses

9. According to a member of the Candidate’s campaign staff, their records indicate that ANDERSON is associated with the number 603- [REDACTED].

10. Additionally, public record data available to law enforcement associate ANDERSON

with the phone number 603-[REDACTED]. Further, the Portsmouth Police Department provided ANDERSON's address as 245 Central Avenue #1, Dover, New Hampshire.

11. Since ANDERSON's listed address is in Dover, New Hampshire, the Dover Police Department was contacted. They advised that they had an interaction with ANDERSON on October 20, 2023, during which he provided his phone number as 603-[REDACTED] and address as 245 Central Avenue, Unit 1, Dover, New Hampshire.

12. Additionally, the Dover Police Department had contact with ANDERSON in 2022 and 2011; both times ANDERSON's phone number was reported as 603-[REDACTED] and his address as 245 Central Avenue, #1, Dover, New Hampshire.

13. Through an open-source carrier lookup, 603-[REDACTED] was determined to be a mobile device receiving cellular service from Verizon Wireless.

14. On December 8, 2023, and into December 9, 2023, I was in contact with Verizon Wireless regarding an exigent disclosure request. I was provided with account information, as well as location ping information as indicated by latitude and longitude coordinates. The subscriber of 603-[REDACTED] is [REDACTED] Anderson, address [REDACTED] [REDACTED] Massachusetts. ANDERSON is listed as an account manager for 603-[REDACTED]. Based on my training and experience, this would be consistent with a typical "family plan" in which one subscriber is associated with multiple telephone numbers belonging to individual family members.

15. The initial location ping I received from 11:53pm on December 8, 2023 was 43.191756, -70.873392 with an accuracy radius of 272 meters. ANDERSON's last known address (245 Central Avenue #1, Dover, New Hampshire) is approximately 75 meters from this ping location.

16. I received ping location data from approximately 11:53pm on December 8, 2023 to approximately 5:45am on December 9, 2023, which indicated that the phone remained in the vicinity of the ANDERSON's last known address. At approximately 11:00 am on December 9, 2023, until the FBI executed a search warrant of 245 Central Avenue at approximately 2:15pm, I received additional ping location data, which indicated that the phone remained in the same location in the vicinity of ANDERSON's last known address.

17. According to records provided by Verizon Wireless, the cellular telephone to which 603- [REDACTED] is assigned is a Samsung Galaxy S10E with IMEI 35206610373174 and IMSI 311480604067856.

18. I have reviewed Verizon Wireless SMS Detail Records, which indicate that 603- [REDACTED] sent two messages at 10:06am on December 8, 2023 to phone number 207- [REDACTED]. Approximately six minutes prior to sending the two messages to 207- [REDACTED], 603- [REDACTED] received a text message from that number.

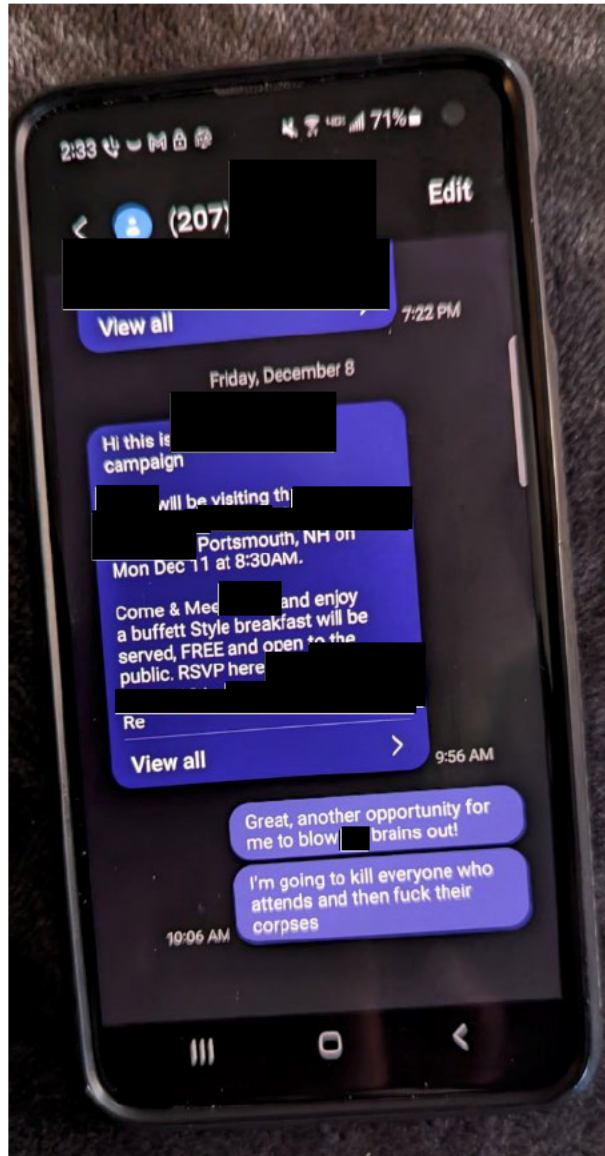
19. I have reviewed SMS Detail Records related to those messages, which indicate that the messages from 603- [REDACTED] to 207- [REDACTED] were processed on the SMSC platforms Westland\_SF07SL and Westland\_SF04SL, which are based in Michigan.

20. On December 9, 2023, federal agents obtained a search warrant for ANDERSON's residence and his person. That warrant authorized the search of ANDERSON's residence and person, and the seizure and search of, among other items, the Samsung Galaxy S10E associated with phone number 603- [REDACTED] and firearms located on the premises.

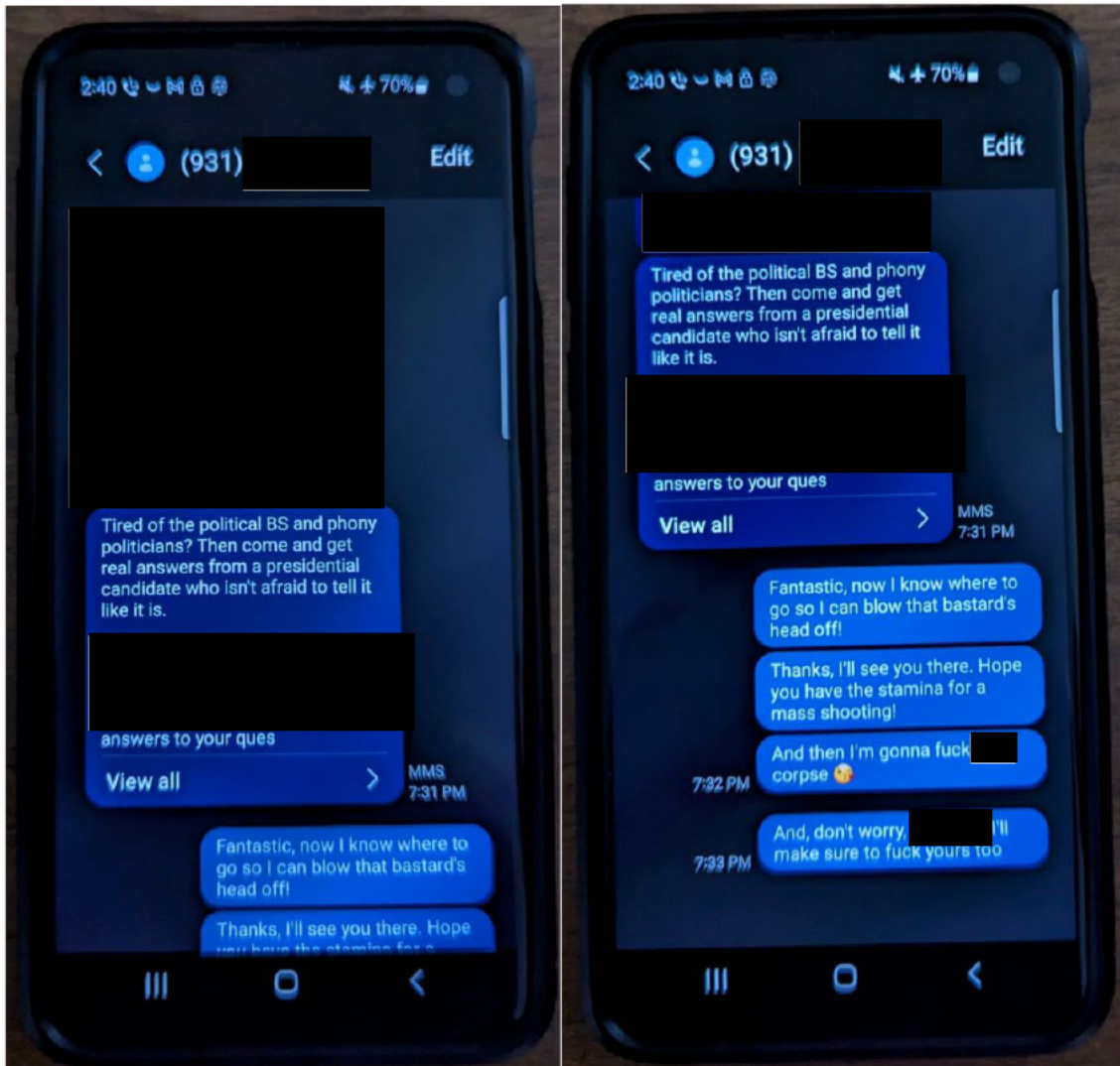
21. On December 9, 2023, law enforcement executed the premises search warrant at ANDERSON's residence and arrested ANDERSON. During the execution of the warrant, agents

found ANDERSON's phone on his bed.

22. During a preliminary search of the phone, FBI Special Agent Kendall McBrearty found, in a deleted folder, the text messages reported by the Candidate's campaign staff:



23. FBI Special Agent Kendall McBrearty also found the below text messages on ANDERSON's phone, sent on or about December 6, 2023 to a different candidate:



24. After his arrest, I transported ANDERSON to the Dover Police Department and read him his Miranda rights. He waived his rights and signed a Miranda waiver form.

25. During the interview, ANDERSON admitted to sending the threatening text messages to the Candidate and said that he sent similar threatening text messages to multiple other campaigns.

26. Based on the foregoing, probable cause exists to believe that ANDERSON, using 603-[redacted] made the aforementioned threats to injure the person of another, namely the



Candidate, and that those threats were transmitted in interstate commerce.

Conclusion

27. Based on the information in this Affidavit, probable cause exists to believe that TYLER ANDERSON made interstate threats in violation of 18 U.S.C. § 875(c). Accordingly, I request that this Honorable Court issue a criminal complaint for TYLER ANDERSON.

/s/Adam Howe  
Adam Howe, Special Agent  
Federal Bureau of Investigation

The affiant appeared before me by telephonic conference on this date pursuant to Fed. R. Crim. P. 4.1 and affirmed under oath the content of this affidavit and application.

Date: Dec 9, 2023

Time: 6:41 PM, Dec 9, 2023

Andrea K. Johnstone

Andrea K. Johnstone  
U.S. Magistrate Judge

