AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Wendy Terry, Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state:

- 1. I am a Special Agent with the FBI and have been since June 2014. I am currently assigned to the FBI's Anchorage Division, Joint Terrorism Task Force, where I investigate international terrorist organizations and home grown violent extremists (HVEs), to include but not limited to, terrorist operators, fundraisers, facilitators, and individuals and organizations involved in the radicalization and recruitment process. My duties include execution of investigative methods to include interviewing witnesses, victims, and suspects, developing probable cause, conducting arrests and executing searches, handling and processing evidence, and assembling cases for prosecution.
- 2. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant charging BENJAMIN CLIFFORD TARBELL ("TARBELL") with violations of Title 18, United States Code, Section 875(c): Threatening Interstate Communications, which states: 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.
- 3. The facts set forth in this affidavit are based on my personal knowledge; knowledge obtained from other individuals, including other law enforcement officers; interviews of persons with knowledge of the crimes; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this affidavit is submitted for the limited purposes of establishing probable cause to support a Complaint and securing an arrest warrant, I have not included each



and every fact known to me during this investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and attached Complaint.

PROBABLE CAUSE

Background

- 4. TARBELL is resident of Kasilof, Alaska. According to WITNESS 1, TARBELL moved from Vermont to Alaska around April 2021 and has remained in Alaska since that time. TARBELL remained employed in Alaska through the summer but struggled with a recent divorce.
- 5. Based on CLEAR and ACCURINT database searches and witness information described below, TARBELL's phone number is 802-345-8903.
- 6. In early August 2021, TARBELL began making threats from Alaska to individuals in Vermont and other states. The threats were made through direct text messages and Instagram messages.
 The threats have escalated in violent tone and include the following:

Specific Threatening Interstate Communications

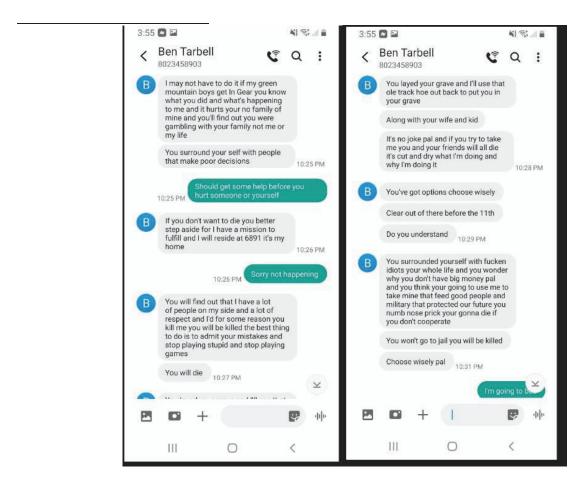
Threat No. 1: August 4, 2021

7. On August 4, 2021, TARBELL sent the following text messages to WITNESS 2: "You will find out that I have a lot of people on my side and a lot of respect and I'd for some reason you kill me you will be killed the best thing to do is to admit your mistakes and stop plying stupid and stop playing games. You will die. You layed your grave and I'll use that ole track hoe out back to put you in your grave. Along with your wife and kid. It's no joke pal and if you try to take me you and your friends will all die it's cut and dry what I'm doing and why I'm doing it.

¹ WITNESSES 1-5 have no known recent criminal history and the veracity of their statements appears credible.



You've got options choose wisely. Clear out of there before the 11th do you understand."



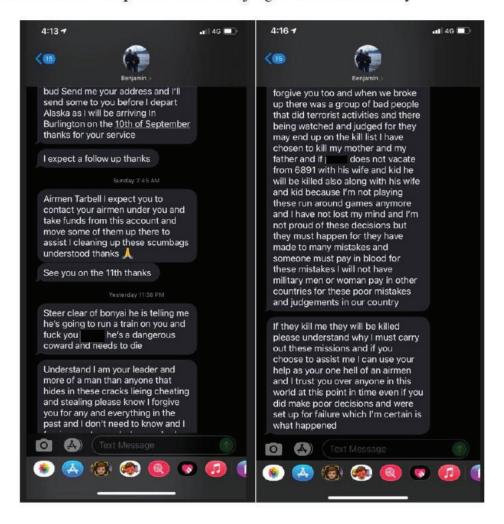
8. WITNESS 2 resides in Vermont and provided the above-screen shots from his/her telephone. WITNESS 2 confirmed the phone number, 802-345-8903, is TARBELL's phone number and that the sender was TARBELL. WITNESS 2 stated that he/she feared for his/her life and believed that TARBELL would follow-through with the threat.

Threat No. 2: August 26, 2021

9. On August 26, 2021, TARBELL sent the following text messages to WITNESS 3: "I depart Alaska as I will be arriving in Burlington on the 10th of September thanks for your service..." "See you on the 11th thanks[.]" "Understand I am your leader and more of a man than anyone that hides in these cracks lying cheating and stealing please know I forgive you for any and



everything in the past and I don't need to know and I forgive you too and when we broke up there was a group of bad people that did terrorist activities and there being watched and judged for they may end up on the kill list I have chosen to kill my mother and my father and if does not vacate from 6891 with his wife and kid he will be killed also along with his wife and kid because I'm not playing these run around games anymore and I have not lost my mind and I'm not proud of these decisions but they must happen for they have made to many mistakes and someone must pay in blood for these mistakes I will not have military men or woman pay in other countries for these poor mistakes and judgements in our country".

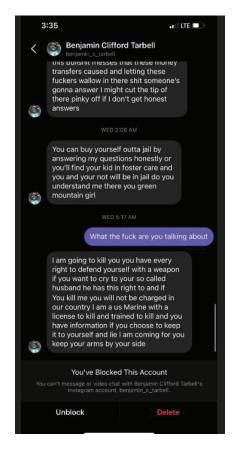




10. WITNESS 3 provided the above-screen shots from his/her telephone. WITNESS 3 confirmed the phone number, 802-345-8903, is TARBELL's phone number and that the sender was TARBELL. WITNESS 3 stated that he/she believed that TARBELL would follow-through with the threat.

Threat No. 3: August 31, 2021

11. On August 31, 2021, TARBELL sent the following threatening Instagram message to WITNESS 4: "I am going to kill you you have every right to defend yourself with a weapon if you want to cry to your so called husband he has this right to and if you kill me you will not be charged in our country I am a us Marine with a license to kill and trained to kill and you have information if you choose to keep it to yourself and lie I am coming for you keep your arms by your side."



12. The display name from the messages was Benjamin Clifford Tarbell, URL:



@benjamin_c_tarbell. TARBELL.

13. WITNESS 4 resides in Vermont and provided the above-screen shots from his/her telephone.
WITNESS 4 stated that he/she believed that TARBELL would follow-through with the threat.

Threat No. 4: August 26, 2021

14. On August 31, 2021, TARBELL sent the following messages to WITNESS 1: "I am gonna tell you what woman your gonna meet you maker if you keep lying. I'm gonna lay you to rest say your good buy cause I'm headed I'll be arriving in 9 days. I'm gonna kill you and dad so do your things and kiss your ass good by this isn't a joke it's not retaliation this is the way it's gonna be good night and good riddance. Your sister and bob are on the list also this is no game.











15. WITNESS 1 resides in Vermont and provided the above-screen shots from his/her telephone. WITNESS 1 confirmed the phone number, 802-345-8903, is TARBELL's phone number and that the sender was TARBELL. WITNESS 5 stated that he/she believed that TARBELL would follow-through with the threat.

Threat No. 5: September 1, 2021

16. On September 1, 2021, TARBELL called the Massachusetts State Police (MSP) at approximately 0106 hrs and began making demands that the police arrest another individual. MSP informed TARBELL that he should speak with the local police department in the city where the individual purportedly resided. At approximately 0128, TARBELL called a second

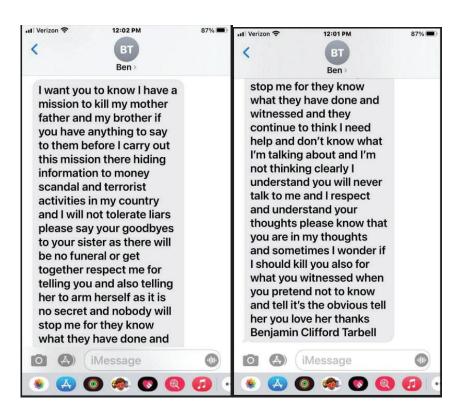
time and stated that he was going to "bomb the State Police and kill every one of you mother fuckers." TARBELL additionally stated he and "the Green Mountain Boys of the Air National Guard would drop bombs." The MSP communication center dispatcher asked TARBELL if he was threatening them which TARBELL replied, "Damn fucking right, I am." MSP further asked TARBELL where he was located and TARBELL confirmed that he was calling from Kasilof, Alaska.

17. The intake officer identified TARBELL through the dispatch caller ID. The intake officer also stated TARBELL identified himself during the conversation. MSP subsequently obtained a ping for the telephone number and received locational data within a small radius of TARBELL's residence in Kasilof, AK.

Threat No. 6: September 3, 2021

18. On September 3, 2021. TARBELL sent the following text message to WITNESS 5: "I want you to know I have a mission to kill my mother father and my brother if you have anything to say to them before I carry out this mission there hiding information to money scandal and terrorist activities in my country and I will not tolerate liars please say your goodbyes to your sister as there will be no funeral or get together respect me for telling you and also telling her to arm herself as it is no secret and nobody will stop me for they know what they have done and witnessed and they continue to think I need help and don't know what I'm talking about and I'm not thinking clearly I understand you will never talk to me and I respect and understand your thoughts please know that you are in my thoughts and sometimes I wonder if I should kill you also for what you witnessed when you pretend not to know and tell it's the obvious tell her you love her thanks. Benjamin Clifford Tarbell."



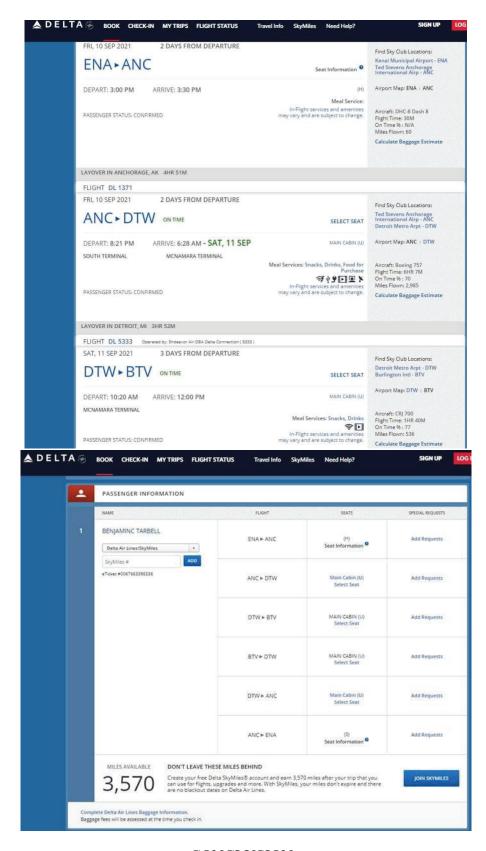


19. The text message is signed "Benjamin Clifford Tarbell." WITNESS 5 provided the abovescreen shots from his/her telephone. WITNESS 5 also provided a screenshot from his/her phone listing "Ben Tarbell," phone number as 802-345-8903. WITNESS 5 stated that he/she believed that TARBELL would follow-through with the threat.

Travel Information

20. Flight records confirm that TARBELL purchased a flight to Vermont and is scheduled to depart Kenai, Alaska on September 10, 2021, at approximately 3pm and arrive in Burlington, Vermont on September 11, 2021.





CONCLUSION

21. WHEREFORE, deponent respectfully requests that the Court find probable cause that BENJAMIN CLIFFORD TARBELL violated Title 18, United States Code, Section 875(c), and issue a warrant authorizing members of the Federal Bureau of Investigation, and other law enforcement officers assisting, to arrest BENJAMIN CLIFFORD TARBELL therefore.

Respectfully submitted,

Wendy Terry

Special Agent

Federal Bureau of Investigation

Subscribed and sworn pursuant to Fed.

Crim. P. 4.1 and 41(d)(3) on:

Sept 10, 2021