

~~SEALED~~ UNSEALED 1/31/25 FJK

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Delaware

FILED

United States of America)

v.)

Mark McLaughlin)

Case No.)

25-67M)

JAN 31 2025

U.S. DISTRICT COURT DISTRICT OF DELAWARE

Defendant(s)

REDACTED

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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 January 22, 2025 in the county of Kent in the District of Delaware, the defendant(s) violated:

Code Section	Offense Description
18 U.S.C. § 875(c)	Transmitting in interstate commerce a communication containing any threat to injure the person of [REDACTED] on or about January 22, 2025.
18 U.S.C. § 875(c)	Transmitting in interstate commerce a communication containing any threat to injure the person of [REDACTED] on or about January 22, 2025.

This criminal complaint is based on these facts:

See attached affidavit

FILED

JAN 29 2025

U.S. DISTRICT COURT DISTRICT OF DELAWARE

Continued on the attached sheet.

/s/ Boyd Pritchard

Complainant's signature

FBI SA Boyd Pritchard

Printed name and title

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

Date:

1/29/25

Laura Hatcher
Judge's signature

City and state:

Wilmington, DE

Hon. Laura D. Hatcher, United States Magistrate

Printed name and title

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

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff	:	
v.	:	Criminal Action No. 25- 67M
	:	
MARK McLAUGHLIN,	:	
	:	
Defendant.	:	
	:	

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

I, Boyd Pritchard, a Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41.
2. I am a duly sworn member of the FBI and have been so employed since March 2018. I am currently assigned to the Baltimore Field Office of the FBI in Dover, Delaware. I participated in new agent training at the FBI Academy in Quantico, Virginia, which included training on drug enforcement. I have successfully completed in-service training courses on drug enforcement sponsored by the FBI, the DEA, and the United States Department of Justice. While employed by the FBI, I have investigated federal criminal violations related to gangs, bank robbery, drug trafficking, firearms trafficking, kidnapping, violent crimes against children, and various other federal violations.

3. Since July 2018, I have been assigned to the FBI's Delaware Violent Crimes/Safe Streets Task Force ("DVCSSTF"), which investigates violations of federal drug, firearms statutes, human trafficking, crimes against children, and any other violations of a violent nature. I am responsible for investigations involving these unlawful activities occurring in the District of Delaware.

4. I have actively participated in investigations of criminal activity, including but not limited to the investigation of drug trafficking, violent crimes against children ("VCAC"), sexual exploitation of children, missing children (to include kidnappings/abductions), sextortion, human trafficking, and cases of malicious threats to include threats of judges, law enforcement, and civilians. I have gained experience through training, classes, and daily work related to conducting these types of investigation. Additionally, I have participated in the authoring and execution of numerous search warrants, some of which involving drug trafficking, child exploitation offenses, and written and online threats. Many of the search warrants resulted in the seizure of drugs, firearms, computers, cellular phones and/or "smart phones," electronic media, and other items evidencing violations of federal laws. I have also participated in the execution of numerous search warrants for online accounts, such as email accounts, online storage accounts, and other online communication accounts related to various federal violations. As a Special Agent of the FBI, I have personally conducted, supervised, and participated in investigations that have resulted in the arrest and conviction of numerous individuals responsible for all the captioned federal violations.

5. The facts in this affidavit come from my personal observations, my review of subpoenaed and other records, my training and experience, and information obtained from other agents/Task Force Officers/law enforcement members, and witnesses. This affidavit is intended to show merely that sufficient probable cause for a search warrant exists, but it does not set forth

all of my knowledge about this matter. I have not, however, knowingly withheld any fact necessary to a determination of probable cause.

6. I am the case agent assigned to the investigation of MARK McLAUGHLIN (“McLAUGHLIN”), date of birth 02/xx/1960, whom the government is investigating for crimes of transmitting communications in interstate commerce containing threats to injure other persons, in violation of 18 U.S.C. § 875(c). Through this affidavit, I submit that there is probable cause to believe that on or about January 22nd, 2025, in the District of Delaware, McLAUGHLIN posted written and video threats on Facebook to injure both [REDACTED], in violation of 18 U.S.C. § 875(c), and respectfully request that the Court issue a criminal complaint and arrest warrant.

PROBABLE CAUSE

Background Information

7. On the evening of January 8th, 2025, [REDACTED] called 9-1-1, resulting in officers of the Toledo Police Department being dispatched to the Heatherdowns Rehab and Residential Care Center, a nursing home located at 2401 Cass Road, Toledo, OH, 43614, (“Heatherdowns Rehab”), regarding threats made by McLAUGHLIN against [REDACTED] [REDACTED], age 66, a resident at Heatherdowns Rehab. Upon arrival, Toledo Police officers contacted [REDACTED] the daughter of [REDACTED], who explained that McLAUGHLIN had threatened to kill her mother, and then commit “suicide by cop.” [REDACTED] further explained that

McLAUGHLIN had made threatening written and video posts on the social networking website Facebook, detailing his plans to “euthanize” ██████ and then leave town.¹

8. Later the same evening, Toledo Police made contact with McLAUGHLIN at his place of residence, 3250 Schneider Road, Apartment 22, Toledo, OH, 43614. When questioned about the threats, McLAUGHLIN again stated that he planned to “euthanize” ██████. As a result, Toledo Police arrested McLAUGHLIN and charged him with aggravated menacing. McLAUGHLIN was arraigned at the Toledo Municipal Court on January 9th, 2025 and released on his own recognizance. McLAUGHLIN’s next court appearance in Toledo is set for February 11th, 2025.

Events in Delaware

9. On or about January 12th, 2025, McLAUGHLIN traveled from Toledo, OH to the area of Dover, DE. This travel is evidenced by McLAUGHLIN’s registered vehicle, a grey 2021 Chrysler Voyager, New Mexico registration 659 XFC, being captured on Delaware State Police license plate readers beginning on January 12th. Additionally, McLAUGHLIN began posting on his Facebook page photos, videos, and references consistent with him being in the Dover, DE area. These posts include photos/videos of him singing karaoke at various bars in Dover including the Celtic Pub, Touchdown Restaurant, and Irish Mike’s Old Town Pub. McLAUGHLIN also revealed in his Facebook posts that he is a retired veteran of the United

¹ MARK McLAUGHLIN’s personal Facebook page was identified as “www.facebook.com/Macskydiver”

States Air Force and wished to visit Dover Air Force Base ("AFB") for lodging and for a flight on a "Space-A" military flight to Europe.

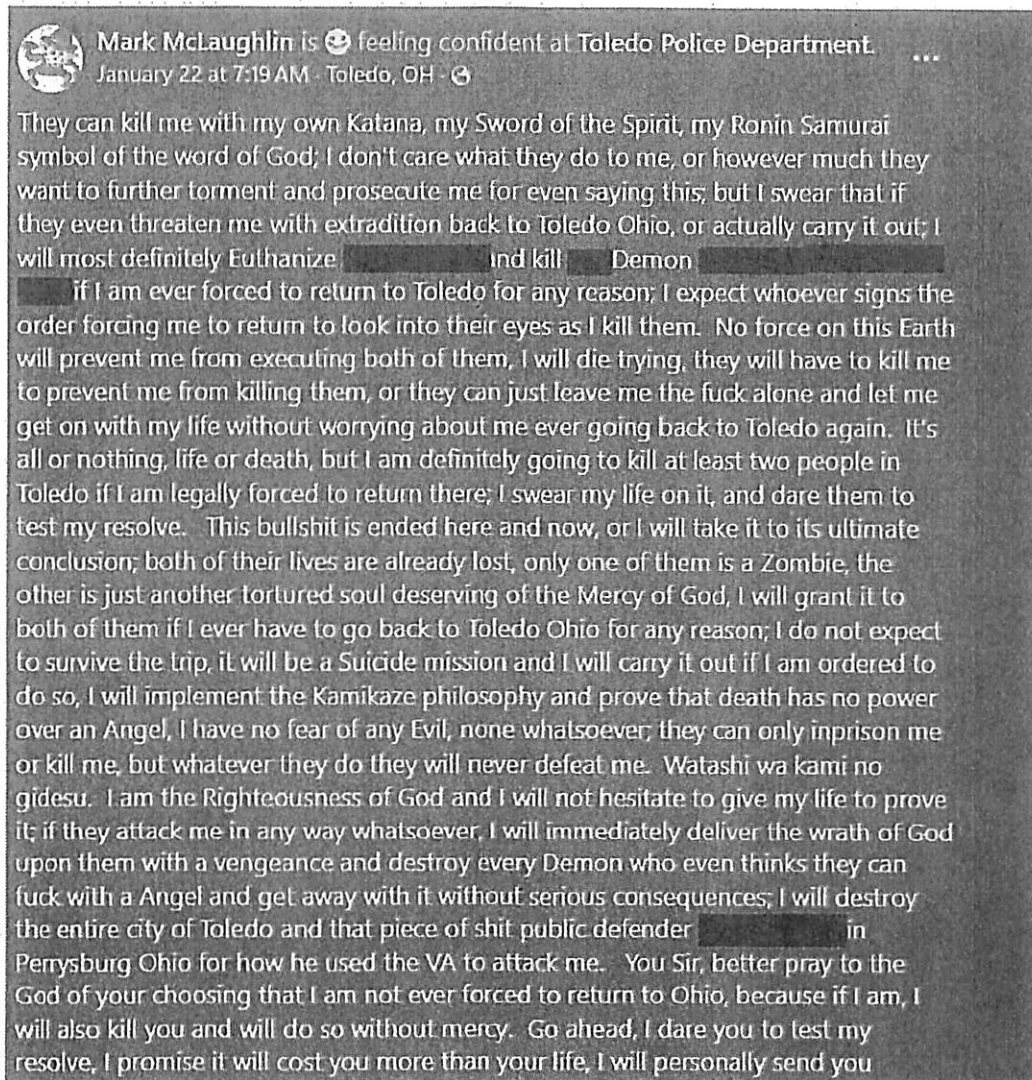
10. On January 23rd, 2025, McLAUGHLIN mistakenly visited the Sexual Assault Victim's Advocate on Dover ABF and contacted a civilian attendant ("Reporter-1") in the office. McLAUGHLIN revealed he was looking for the Veterans Affairs ("VA") office, but in conversations with Reporter-1, he made several statements Reporter-1 considered worrisome, including that he was "on the run" from law enforcement. Upon McLAUGHLIN leaving, Reporter-1 contacted the Air Force Office of Special Investigations ("OSI") regarding McLAUGHLIN's statements and possible fugitive status.

11. OSI soon discovered McLAUGHLIN's Facebook page and began to review its content. OSI discovered numerous threatening and concerning Facebook posts and videos of McLAUGHLIN. Due to these concerning posts, OSI contacted McLAUGHLIN outside of his base lodging hotel room on Dover AFB on January 23rd, 2025. Upon being questioned, McLAUGHLIN gave written and verbal consent to search his base hotel room and vehicle. Results of this search included a Ziploc bag of psilocybin mushrooms, numerous packets of THC gummies, several THC vape cartridges, a hatchet, a set of wooden nunchucks, a 22-inch machete, and a 22-inch katana sword. As a result, McLAUGHLIN was charged with three misdemeanors for simple possession of a controlled substance and one misdemeanor for possession of a dangerous weapons by the Air Force Security. Additionally, McLAUGHLIN was permanently banned from Dover AFB.

12. Following these events, OSI contacted the FBI and your affiant regarding McLAUGHLIN and the threatening posts observed on his Facebook page. Upon review of McLAUGHLIN's Facebook page, your affiant noted numerous posts beginning on January 12th,

2025, of McLAUGHLIN in the Smyrna, DE and Dover, DE area patronizing bars, taking photos at the Dover AFB and then discussing in text and video messages his anger and frustration with the Dover AFB Security Forces and OSI.

13. On January 22nd, 2025 at 7:19am, McLAUGHLIN posted a written and video message to his Facebook page explicitly and directly threatening [REDACTED] McLAUGHLIN alluded to his Toledo, OH aggravated menacing charges and posted the following express threat to kill [REDACTED] if he returns to Toledo:



God of your choosing that I am not ever forced to return to Ohio, because if I am, I will also kill you and will do so without mercy. Go ahead, I dare you to test my resolve, I promise it will cost you more than your life, I will personally send you straight to hell without question or remorse; your screams will echo for all eternity. You do not fuck with Angels, or Retired Special Operations Veterans without bringing the wrath of God upon yourself. It's Jujutsu applied to Spiritual Warfare; your own force is what destroyed you, I haven't caused you any harm, I have not sinned against you though you hunt my life to take it. You made the bet, if I ever come back to Ohio, your chips are getting cashed in; I suggest you get your affairs in order before then, but I don't give a shit what you do. Believe whatever you like, but you may wish to consider discouraging anyone who thinks it's a good idea to extradite me back to Toledo from doing so, it will cost your life and at least two others if they succeed. I don't care if you believe me or not, I will prove that I am telling you and everyone else the truth; I am an Angel, a Messenger, your interpretation of my message is entirely up to you, but I am telling the truth and will most definitely prove it with my last breath. Do not be overcome with Evil, rather overcome evil with good. Romans 12:21. I cannot be defeated by the Demons in Toledo, New Mexico, Pennsylvania, nor anywhere else in the world; I stand firm wearing the whole Armor of God. That's Victory over death. You may abandon your own body, but you must preserve your Honor; it's all that matters.
Watashi wa kami no gidesu.
MadMacsAdventures.net

14. Attached to this post is a nearly 12-minute video of McLAUGHLIN directly talking to a video recording device and discussing his Ohio aggravated menacing charge. McLAUGHLIN seems to be sitting in his vehicle at night recording himself. McLAUGHLIN has many similar posts on his Facebook page giving long soliloquies of his travels, military experiences, sexual conquests, political views, and many other topics. Below is a still screen shot of the video captured from McLAUGHLIN's Facebook of the particular video in question.

Mark McLaughlin Officer at Toledo Police Department

They came to me with my own Katana my Sword of the Samurai, Roman Samurais, most of the word of God I don't care what they do to me or how ever much they want to further torment and prosecute me for even saying this out I swear that if they even threaten me with extradition back to Toledo Ohio I will actually carry it out I will most definitely euthanize [REDACTED] and [REDACTED] Demon [REDACTED] if I am ever forced to return to Toledo for any reason I will... See more



Like Comment Share

15. The video discusses a wide number of disjointed topics however, at approximately the 8-minute mark McLAUGHLIN states the following:

"Hell, they are trying to put me away for six months for buying someone's cremation... for buying [REDACTED] cremation and promising to make a cloud out of her when she passes. I can't think of a kinder, nicer thing to honor her.... Other than personally euthanizing

her [REDACTED] myself which is exactly what I will do if those assholes in Toledo decide to extradite me on these charges of aggravated menacing. Let me aggravate your menacing a little bit, not only will I kill her, you will watch the life go from her eyes as I kill her and [REDACTED] fucking [REDACTED] You make me come back to Toledo; I will not waste the trip. I will do exactly what the fuck I said I will do."

16. Of note, during the video, McLAUGHLIN's demeanor and tone completely changes when he begins to mention the Toledo Police Department. McLAUGHLIN becomes irate at the mention of Toledo and begins yelling at the camera with spittle projecting from his mouth at one point.

17. Additionally, McLAUGHLIN "tagged" the Toledo Police Department in the post. Your affiant knows that "tagging" is a common tool in Facebook that allows the user to create a link to the tagged person's or entity's profile. These "tags" also notify the tagged person or entity that they have been referenced in someone's post. Your affiant believes McLAUGHLIN is directly warning Toledo Police with his statements. To clarify, I do not believe this tag means that McLAUGHLIN was physically in Toledo, OH, when he made this threatening post on Facebook, but rather, that he was taunting the Toledo Police Department.²

² Your affiant confidently believes McLAUGHLIN was in the area of Dover, DE from January 12th to January 28th, 2025. Your affiant makes this assertion based on license plate reader returns of McLAUGHLIN's vehicle, Dover AFB gate logs, McLAUGHLIN's Facebook posts of him patronizing Dover bars and visiting Dover area locations, and hotel receipts from his lodging on Dover AFB. Additionally, the travel distance from Dover to Toledo is 555 miles with a one-way drive time of 8½ hours according to Google Maps.

18. McLAUGHLIN also tags both [REDACTED] in the written Facebook post, which as noted, would send a notification to them of McLAUGHLIN's post. Your affiant believes McLAUGHLIN purposefully and intentionally tagged [REDACTED] as a means to intimidate and directly threaten them.

19. In reference to McLAUGHLIN's above statements on his Facebook post from January 22nd, 2025 wherein he states that "...they are trying to put me away for six months for buying someone's cremation... for buying [REDACTED] cremation and promising to make a cloud out of her when she passes[.]" your affiant reviewed McLAUGHLIN's Facebook page and found a post on January 1st, 2025, of a photo of two documents that appear to be billing forms from a funeral home completed with McLAUGHLIN's and [REDACTED] information and the associated funeral pricing.

20. The above threatening Facebook post remained on McLAUGHLIN's timeline from the time he posted it on the morning of January 22nd, 2025, to approximately mid-day on January 27th, 2025, at which time the post was removed from McLAUGHLIN's profile. Your Affiant and the FBI have retained screen shots of the original post, and an audio/video recording of the original video. A preservation letter has also been issued to Facebook Inc.

Interview with Confidential Witness

21. On the afternoon of January 27th, 2025, your affiant telephonically interviewed a Confidential Witness ("CW-1") regarding McLAUGHLIN. CW-1 had personal and detailed factual information regarding McLAUGHLIN and events that transpired in Ohio. CW-1's statements were found to be consistent with police reports, McLAUGHLIN's Facebook posts, and photos and documents obtained by the FBI.

22. CW-1 explained that [REDACTED] was admitted to Heatherdowns Rehab after suffering a stroke in approximately January 2024 and remains there to date. CW-1 reported that McLAUGHLIN is friends with [REDACTED] and visits [REDACTED] at Heatherdowns Rehab. CW-1 reported that in December 2024, McLAUGHLIN visited [REDACTED] and brought a katana sword which he left in [REDACTED] room. Because the sword was considered a weapon and contraband, it was removed from [REDACTED] room and was not returned to McLAUGHLIN. CW-1 stated that at Heatherdowns Rehab, visitors can come and go through unlocked doors without any check-in process during normal business hours. CW-1 further reported that on at least one occasion, Heatherdowns Rehab staff moved [REDACTED] into a different patient room in order to elude McLAUGHLIN during his visits due to the threatening nature of his behavior. CW-1 stated that [REDACTED] has some mental and speech impairments as a result of the stroke and does not appear to understand the gravity of McLAUGHLIN's behavior.

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CONCLUSION

23. Based on the facts set forth herein, I submit that there is probable cause to believe that MARK McLAUGHLIN transmitted communications in interstate commerce containing threats to injure other persons, specifically [REDACTED] while he was located in the District of Delaware, in violation of 18 U.S.C. § 875(c). I therefore respectfully request the Court issue a criminal complaint and arrest warrant against McLAUGHLIN for these offenses.

Respectfully submitted,

/s/ Boyd Pritchard
Special Agent Boyd Pritchard
Federal Bureau of Investigation

Sworn to me over the telephone and signed by me pursuant to
Fed. R. Crim. P. 4.1 on this 29th day of January, 2025.



THE HONORABLE LAURA D. HATCHER
UNITED STATES MAGISTRATE JUDGE