UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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| UNITED STATES OF AMERICA<br><br>v.<br><br>MICHAEL P. MAHONEY,<br>Defendant | **FILED UNDER SEAL**<br><br>CRIMINAL No. 25-8183-PGL |

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT**

**Introduction and Agent Background**

I, Timothy D. Brown, being sworn, state:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Boston Division, Lakeville Resident Office, in Massachusetts. I have been employed in this capacity since 2009. From 2016 to 2018, I was assigned to the FBI Headquarters as a Supervisory Special Agent at the FBI's Counterterrorism Division. I have also been assigned as a Supervisory Special Agent for the Joint Terrorism Task Force ("JTTF") in Boston for 5 years.

2. As an FBI agent, I am responsible for the investigation of federal criminal offenses and have experience working complex criminal investigations. I have participated in various investigations involving national security matters, including numerous complex international terrorism investigations and those involving homegrown violent extremists and threats to life. I routinely work with agents, state troopers, and local police officers investigating crimes involving terrorism. In my capacity as a Special Agent, I have received training and experience in search and seizure, the use of confidential human sources, international and

domestic terrorism, violent crimes, computer crimes, and other criminal activity. As a result of my training and experience, I am familiar with the tactics, methods and techniques used by terrorist networks and members of those networks, including the use of computers, cell phones, social medial, emails, and the internet in connection with criminal activity. Before being employed as an FBI Agent, I was employed as a police officer with the U.S. Capitol Police in Washington, D.C. for more than 4 years. As a Special Agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

3. I submit this affidavit in support of a criminal complaint charging Michael MAHONEY (hereinafter, "MAHONEY") , born in 1963, with Transmitting Interstate Threats in violation of 18 U.S.C. § 875(c) (the "Target Offense"). As set forth below, there is probable cause to believe that on or about March 28, 2025, MAHONEY, while located in Massachusetts, used a cell phone assigned call number 206-285-0156 to place a call in interstate commerce to the relative of a prominent federal official (hereinafter, the "Relative" and the "Federal Official," respectively) during which MAHONEY threatened to murder the Relative, the spouse of the Relative (hereinafter, "the Spouse"), and the Federal Official.

4. The facts in this affidavit come from my personal observations, my training and experience and information obtained from other investigators and witnesses. This affidavit is submitted for the limited purpose of establishing probable cause to believe that MAHONEY has committed the Target Offense. Accordingly, I have not included each and every fact known to me and other law enforcement officers involved in this investigation. I have set forth only the facts that I believe are needed to establish the requisite probable cause.

## Relevant Legal Authority

5. It is a violation of Title 18, United States Code, Section 875(c) for any person who "transmits in interstate or foreign commerce any communication containing any …threat to injure the person of another." A "threat " is a serious expression of intent to commit an act of unlawful violence to a particular individual or group of individuals.

## Facts Supporting Probable Cause

6. On or about March 28, 2025, the Relative was having dinner with two other individuals at a location outside the District of Massachusetts. At approximately 10:15 p.m., the Relative received a phone call that appeared on the Relative's phone as "No Caller ID." The Relative answered the call, believing the call was related to the Relative's Spouse, who was traveling to meet the Relative. The caller, who appeared to be an adult male, spoke to the Relative and asked, using the Relative's full name, if the Relative was, in fact, the person in question. The Relative replied in the affirmative. The caller then started to scream and stated that he was going to "murder" the Relative, the Relative's Spouse, and the Federal Official. The caller referred to the Spouse and the Federal Official by their first names. The caller continued and said, "Die you fucking cunt mother fucker." The Relative hung up while the caller was yelling. The caller then called back immediately but the Relative did not answer. The first call lasted approximately 12 seconds. The Relative provided screen shots to investigators of the Relative's phone which showed the date and the exact time of the two calls.

7. The Relative then contacted law enforcement officials. Using the information obtained from the Relative's phone, law enforcement officials then requested call detail records ("CDRs") from the service provider for the Relative's phone.

8. The CDRs indicated that the originating number for the threatening call and the subsequent call was 1-206-285-0156. The service provider's Global Demand Center subsequently provided subscriber information for the listed number as well as a one-time location ping to identify the current location of the phone. The subscriber was identified as MAHONEY, with a billing address of 1818 West Riverside Avenue, Apt. 4, in Spokane, Washington. The "ping location" provided in the afternoon on March 29, 2025, indicated that the phone was in the area of 16 Quivet Drive, South Dennis, Massachusetts.

9. Further investigation included a review of MAHONEY's U.S. passport application, dated 12-12-2022, and a record found within the Massachusetts Registry of Motor Vehicles database which appears to be submitted in 2023; both of which identify MAHONEY's address as 18 Quivet Drive, South Dennis, Massachusetts.

9. On the evening of March 29, 2025, I and other law enforcement officers went to the 18 Quivet Drive location. We were wearing clothing which identified us as law enforcement. We knocked on the front door and observed an individual approach a different door and turn the lights on. I recognized that individual as MAHONEY from my review of his passport application photo. Upon seeing us, he immediately turned away and walked quickly in the opposite direction. He turned off all of the lights inside the house. Calls were placed to MAHONEY's phone but he did not answer those calls.

## CONCLUSION

Based upon the information described herein, there is probable cause to believe that on or about March 28, 2025, Michael MAHONEY violated 18 U.S.C. § 875(c). The requested Complaint and accompanying arrest warrant should issue.

Timothy D. Brown /by Paul G. Levenson
Timothy D. Brown
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to me telephonically on April 1st, 2025.

HON. PAUL G. LEVENSON
UNITED STATES MAGISTRATE JUDGE

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