

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Sara Pedersen, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a Special Agent (“SA”) of the Federal Bureau of Investigation (the “FBI”), and as such, I am an investigative or law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. I am engaged in the enforcement of criminal laws and am within a category of officers authorized by the Attorney General to request and execute search warrants pursuant to 18 U.S.C. §§ 3052 and 3107 and United States Department of Justice regulations set forth at 28 C.F.R. §§ 0.85 and 60.2(a).

2. I have served as an FBI SA since June of 2014. Currently, I am assigned to the Toledo Resident Agency in the Cleveland Division. I earned two bachelor’s degrees and a Juris Doctorate degree. Before joining the FBI, I practiced law as a criminal defense attorney at the state court level for approximately six years. I represented defendants in misdemeanor and felony cases involving various criminal offenses and litigated the same.

3. As a SA in the FBI, I have extensive experience investigating national security cases involving both international and domestic terrorism, as well as criminal investigations involving murder, kidnapping, racketeering, public corruption, healthcare fraud, crimes against children, and drug trafficking. I have also completed FBI-administered counterterrorism classroom and online training at the FBI Academy and other FBI facilities.

4. The facts in this affidavit come from my personal knowledge, observations, training and experience, and information obtained from other agents and witnesses. This affidavit does not contain every fact known in the investigation, only those facts necessary to establish sufficient probable cause for the requested warrant.

STATUTORY AUTHORITY

5. Title 18, United States Code, Section 875(c) prohibits transmission in interstate or foreign commerce of any communication containing a threat to kidnap any person or a threat to injure the person of another.

PROBABLE CAUSE

6. On March 23, 2026, military veteran TYLER J. DAVIS called a veterans' service phone number to report that the regional office in Cleveland was trying to sever his veteran's benefits. DAVIS claimed this was being done was because he had deployed to Israel and the VA organization was allegedly antisemitic, thus denying benefits to those who deployed to that country. During the recorded phone call, DAVIS made the following threatening statements:

- A. "The day they take my benefits is the day I come in there and start shooting motherfuckers in the head."
- B. "If they sever my benefits, I'm going to come in there and shoot the security team first, and then all the rest in the fucking head after I wedge the doors in."
- C. "I'm going to fucking murder motherfuckers."
- D. "You tell the chief of police that too. Shit, he'll be the first one I fucking hit."

7. Employee, "M.D.," who is located in Iowa, answered the call described in paragraph 6 from DAVIS. M.D. stated that DAVIS called the Veterans Benefits Administration National Call Center phone number 800-827-****. When that phone number is called, the caller is put into a queue for the first available representative, which is how M.D. was connected with DAVIS.¹ "M.D." took DAVIS'S statements as threats, as he reported the incident by filing a

¹ DAVIS's call was made at 9:17am EST on March 23, 2026, and he was arrested by the Toledo Police Department at approximately 1:21pm EST. Google Maps indicates the eastern edge of Iowa is approximately 6 hours away, indicating DAVIS was not in Iowa when he placed the call.

Physical Threat on Employee report with the VA . DAVIS resides in the Toledo area in the Northern District of Ohio.

8. Per a Toledo Police Department Complaint that was filed on March 24, 2026, with the Toledo Municipal Court, DAVIS called the Lucas County Veterans Service Commission and left a voicemail on March 20, 2026. In the voicemail, DAVIS stated he would shoot the place up and slash everyone's tires. DAVIS left his identifying information in the voicemail. The Lucas County Veteran Service Commission interpreted DAVIS'S call as a threat, as they reported it to law enforcement.

9. The month before DAVIS made that phone call, DAVIS submitted information online to a VA website on February 23, 2026. In that submission, DAVIS complained that a doctor had not shown up to a scheduled hearing, that he was tired of the antisemitism against him for being deployed to Israel, and that he was tired of his claim taking so long. In the section that asks "Names of victims," DAVIS wrote, "The veteran; soon to be providers[.]" DAVIS later wrote in the form, "Let this be an official memorandum to you and anyone at the VA that when you start having directors getting strung up by their necks and providers getting shot in their head; that it is known to them that the VA has been doing this for a long time." He also stated, "We are not going to tolerate spoon fed civilians taking our money to give us the runaround anymore. By order of the Veteran Mafia[.] PS – Pigs won't protect you[.]" DAVIS final comment was, "Call the police for help I have AP rounds and friends that slay hogs."

10. The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

11. On January 22, 2026, Department of Veterans Affairs Special Agent Fabricio Leite conducted a telephonic interview with Wood County, Ohio, Veteran's Service Officer Zack Migura, after receiving a report from Migura that he had overheard DAVIS make threatening statements about a VA employee. Migura stated that on December 11, 2025, he attended a meeting with local veterans at the Interstate Lanes Bowling Alley in Rossford, Ohio. At that meeting, Migura heard DAVIS say he "has a 7mm for his VA rater if his rating is not satisfactory." Migura thought DAVIS'S comment was inappropriate and threatening, so he decided to report it to the VA. Migura stated it was his first time attending that meeting and he has had no prior interactions with DAVIS.

12. On March 23, 2026, Toledo Police Department made contact with DAVIS at his residence in Toledo, Ohio. During this encounter, DAVIS was Mirandized and interviewed by TPD and a VA Office of Inspector General ("OIG") SA.

13. During the interview, DAVIS stated that he has been told for ten years that his deployment to Israel 'does not count.' He said he had friends who died over "there," specifically stating they flew in with five and only left with three. DAVIS asked the OIG SA what he was supposed to do, 'live with his broken radiated brain, misery in his broken body, and continue to be ignored while his house crumbled and everything he tried to do just fell apart.' The OIG SA told DAVIS there were right ways to do things, to which DAVIS responded that he had tried the right ways.

14. The OIG SA told DAVIS that he had to stop making these threats and confronted DAVIS with how detailed he was in his threatening call that morning. The OIG SA asked DAVIS if he remembered the call, to which DAVIS replied, "I know what I'm doing." The OIG SA asked DAVIS if he meant to do it. DAVIS responded that he understood Ohio legislation,

stating that lethal force was authorized if two of three elements are met for serious bodily harm injury – intent, capability, or opportunity. DAVIS further stated that if the VA was trying to sever his benefits for multiple reasons over and over that was going to cause him harm. If the VA was going to threaten him, his logical sense as a Marine was “to respond.” DAVIS advised that he had tried to file paperwork, but he felt the VA was against him and that it was a conspiracy. He said he has felt like this for a long time. The OIG SA said he wanted to figure this out, to which DAVIS replied, he wanted to figure this out too, as long as it was someone other than the Cleveland regionals, claiming that ‘someone was buddies with someone’ and they were messing with DAVIS. The OIG SA told DAVIS that law enforcement wanted to temporarily take his guns. DAVIS replied, it did not matter if law enforcement took the guns, because he knew how to make “HME.”² Ultimately, DAVIS consented to law enforcement taking his firearms.

15. DAVIS consented to a search of the residence for his firearms, firearm parts, and ammunition. DAVIS also signed a “waiver of search warrant” form. After the firearms and ammunition were located, DAVIS’S wife, Maria Davis, also signed a TPD receipt allowing TPD to hold the listed items for safekeeping. The items are as follows:

- A. Remington 12 gauge, s/n AB445293K
- B. Howa Model 1500, s/n B267155
- C, Sig P320, s/n M18A040367
- D. Beretta 92FS, s/n K85938Z
- E. Colt Revolver, s/n 82332

² The Affiant is aware that “HME” is an acronym for home-made explosives.

F. New England Firearms 12 gauge, s/n NY550961

G. Bersa Thunder .380, s/n AB9563

16. The OIG SA told DAVIS that he makes it hard when he says that he is going to go out there and shoot people and gives a detailed description of how he is going to block the door and take out security. DAVIS replied, “Yeah I practice. I dry run. I practice all day, everyday . . . ever since I got back from Israel” and “I was an operator. I stay an operator.”

17. While still on scene, DAVIS briefly spoke with his wife, Maria. DAVIS’S wife said she heard DAVIS make a call that morning, and DAVIS stated, “I lost it.” DAVIS went on to say he was told he would be booked and then released, but he did not believe he would actually be released. When his wife asked what she needed to do, DAVIS told her to just take care of the animals. He went on to say that he did not cry because he was getting arrested, he cried because he remembered Israel.

18. Investigators on scene spoke to DAVIS’s wife who indicated that DAVIS rarely left their Toledo residence, and when he did, it was to take a walk. She advised that she works at a local hospital in security and carries a gun in the course of her employment. It was in her vehicle at the time law enforcement made contact with her and DAVIS.

19. DAVIS was taken into custody on March 23, 2026, for making terroristic threats (felony) regarding the threatening statements he previously made to veteran’s service employees.

20. DAVIS was previously arrested by Oregon Police Department on August 18, 2023, for Telecommunications Harassment involving an ex-girlfriend. However, it was later dismissed.

CONCLUSION

21. Based on all of the above, there is probable cause that DAVIS has violated Title

18, United States Code, Section 875(c), Interstate Communications of Threats. Accordingly, Affiant requests issuance of the requested criminal complaint and arrest warrant.

Respectfully submitted,



Special Agent Sara Pedersen
Federal Bureau of Investigation

Sworn to by video or telephone after submission by reliable electronic means, per Crim R. 41(d)(3) and 4.1 on this 25th day of March, 2026.



DARRELL A CLAY
UNITED STATES MAGISTRATE JUDGE