

UNDER SEAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Norfolk Division

2:24mj

AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT

I, Erik Gudmundsen, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since 2017. I am assigned to work, and have experience in, cyber and organized crime investigations to include racketeering, major theft, interstate transportation of stolen property, money laundering, computer intrusions, identity theft, wire fraud, financial institution fraud, and sending threats via interstate communications within the Norfolk, Virginia Division. I have received law enforcement training in the investigation of criminal violations of federal law within the jurisdiction of the FBI and have received specialized training in the investigation of computer related crimes. Additionally, I have received training and gained experience in arrest procedures, search warrant applications, the execution of searches and seizures, and various other criminal laws and procedures. I have participated in the execution of search warrants, including those involving the search and seizure of electronic media, computers, and telephonic devices. I have also used historical and prospective cell site data to locate phones of subjects in the course of my investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant charging TAYLOR BULLARD (hereinafter “BULLARD”) with violations of 18 U.S.C. § 875(c) (making threatening interstate communications).

4. The facts in this affidavit come from my personal observations and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and complaint and does not set forth all of my knowledge about this matter. Rather, I have included only the facts that are sufficient to establish probable cause for the issuance of a criminal complaint and the issuance of an arrest warrant for BULLARD for the above-described criminal violations.

PERTINENT FEDERAL CRIMINAL STATUTES

5. 18 U.S.C. § 875(c) provides 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 punished.

PROBABLE CAUSE

6. The Norfolk Field Office of the Federal Bureau of Investigation (FBI) is investigating allegations that an individual has made a threat specifically against the executive team of Company A¹, a debt collection agency located in Norfolk, Virginia.

7. The threat was received by Company A on December 12, 2024, via email in Norfolk, Virginia. The email responded to an email that Company A originally sent to BULLARD, urging BULLARD to create a payment plan to resolve his approximate \$543 debt

¹ For purposes of this affidavit, the true identity of the victims will be protected due to privacy concerns and rights.

with the company. Figure 1, below, documents the email received by Company A, in which BULLARD signed his name after threatening to show up to one of Company A’s locations with a machete and gasoline, in order to “do things that are unforgivable” and “make your executive team question their life choices”.

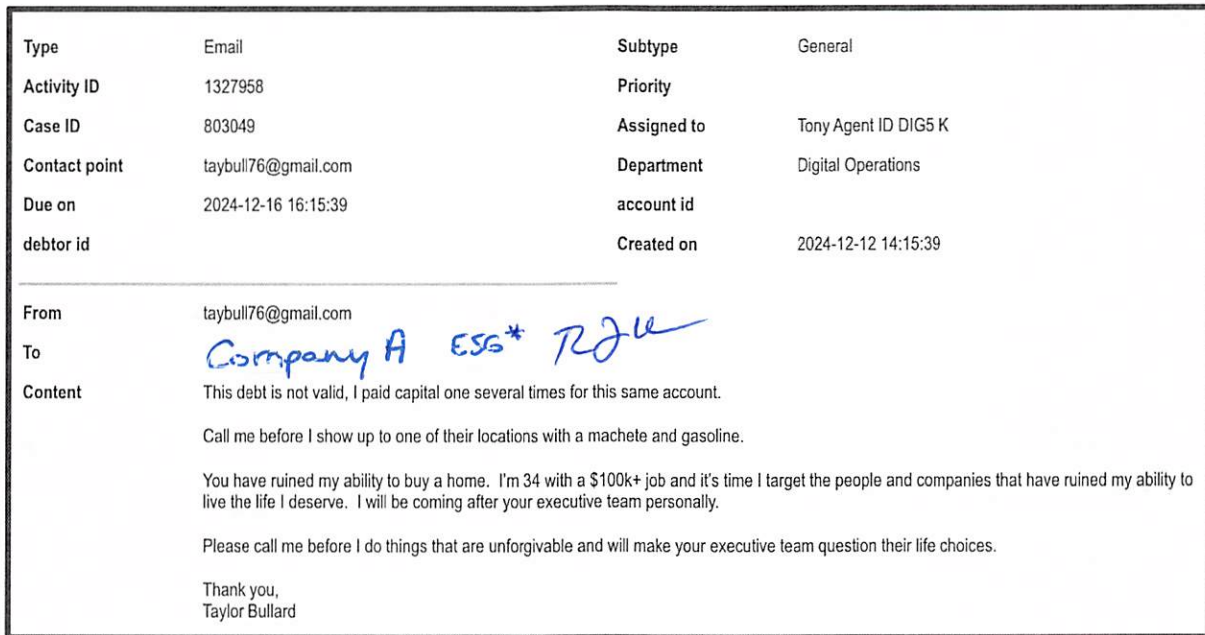


Figure 1: Email from December 12, 2024

8. The threatening email was received via one of Company A’s email addresses, which is handled by Company A’s Digital Operations department in, Norfolk, Virginia.
9. Norfolk is located in the Eastern District of Virginia.
10. Database checks revealed that BULLARD, of Texas, is 34 years old, matching the age he provided in the threatening email.
11. Google LLC (Google) provided subscriber and other information regarding TAYBULL76@GMAIL.COM in response to an emergency request. Select subscriber information associated with the Google account TAYBULL76@GMAIL.COM is as follows:

- a) Name: TAYLOR BULLARD
- b) Creation date: 8/9/2007
- c) Phone Numbers: xxx-xxx-5430, xxx-xxx-5371
- d) Recovery email: TAYBULL76@YAHOO.COM
- e) Recovery SMS: xxx-xxx-5430

12. Google provided a number of date / time / IP address combinations, including three which were provided to Comcast Cable (Comcast) for follow on subscriber information, and three provided to Verizon for follow on subscriber information and location data.

13. The date / time / IP address combinations provided to Comcast are as follows:

- a) 2024-12-13 14:13:15 Z, 2601:2c7:467f:b6c0:60ae:99bd:5377:a12b
- b) 2024-12-12 14:15:56 Z, 2601:2c7:467f:b6c0:c8ff:7e5d:b5b2:bd89
- c) 2024-12-11 13:19:18 Z, 2601:2c7:467f:b6c0:442c:d73c:baa9:5a28

14. The resulting subscriber information for all three Comcast date / time / IP address combinations in response to an emergency request are as follows:

- a) Subscriber: TAYLOR BULLARD
- b) Telephone: xxx-xxx-5430
- c) Address: Houston, Texas 77071

15. The date / time / IP address combinations provided to Verizon are as follows:

- a) 2024-12-14 05:28:24 Z, 174.202.224.76 (invalid, per Verizon)
- b) 2024-12-12 18:59:10 Z, 2600:100d:b00b:840c:89ab:36e0:d81f:af6d
- c) 2024-12-08 18:34:46 Z, 2600:100d:b15e:423a:3957:305e:ff07:b1d8

16. The resulting subscriber information for the two valid Verizon date / time / IP address combinations in response to an emergency request are as follows:

a) Subscriber: TAYLOR BULLARD

b) Telephone: xxx-xxx-5430

c) Address: Spring, Texas 77389

17. Google, Comcast, and Verizon all list the phone number xxx-xxx-5430 as a phone number for BULLARD.

18. Verizon provided prospective location information relating to the cell phone utilizing the phone number xxx-xxx-5430 in response to an emergency request. On December 15th and 16th, 2024, the timeframe in which Verizon provided cell phone location information, the location of the phone has been in the Houston, Texas area, frequently near the Houston, Texas the address where BULLARD is a subscriber of Comcast.

19. The investigation reveals that in 2017, BULLARD also made email threats to other companies using the email account TAYBULL76@GMAIL.COM. The emails he sent included a threat to release anthrax at one of their events, and/or kill himself in public. The FBI interviewed BULLARD, and in summary, BULLARD stated that he wanted attention, wanted to see the companies sweat, and did not intend to hurt himself or others.

20. In 2022, via voicemail left with Company B's customer service, BULLARD threatened to go to an open Company B branch with an AK-47 and shoot up the drive through, as well as threaten to damage an ATM.

21. Figure 2 below shows BULLARD's public facing Twitter / X account, @TAYBULL76, in which he made threats in 2022 against Company C.

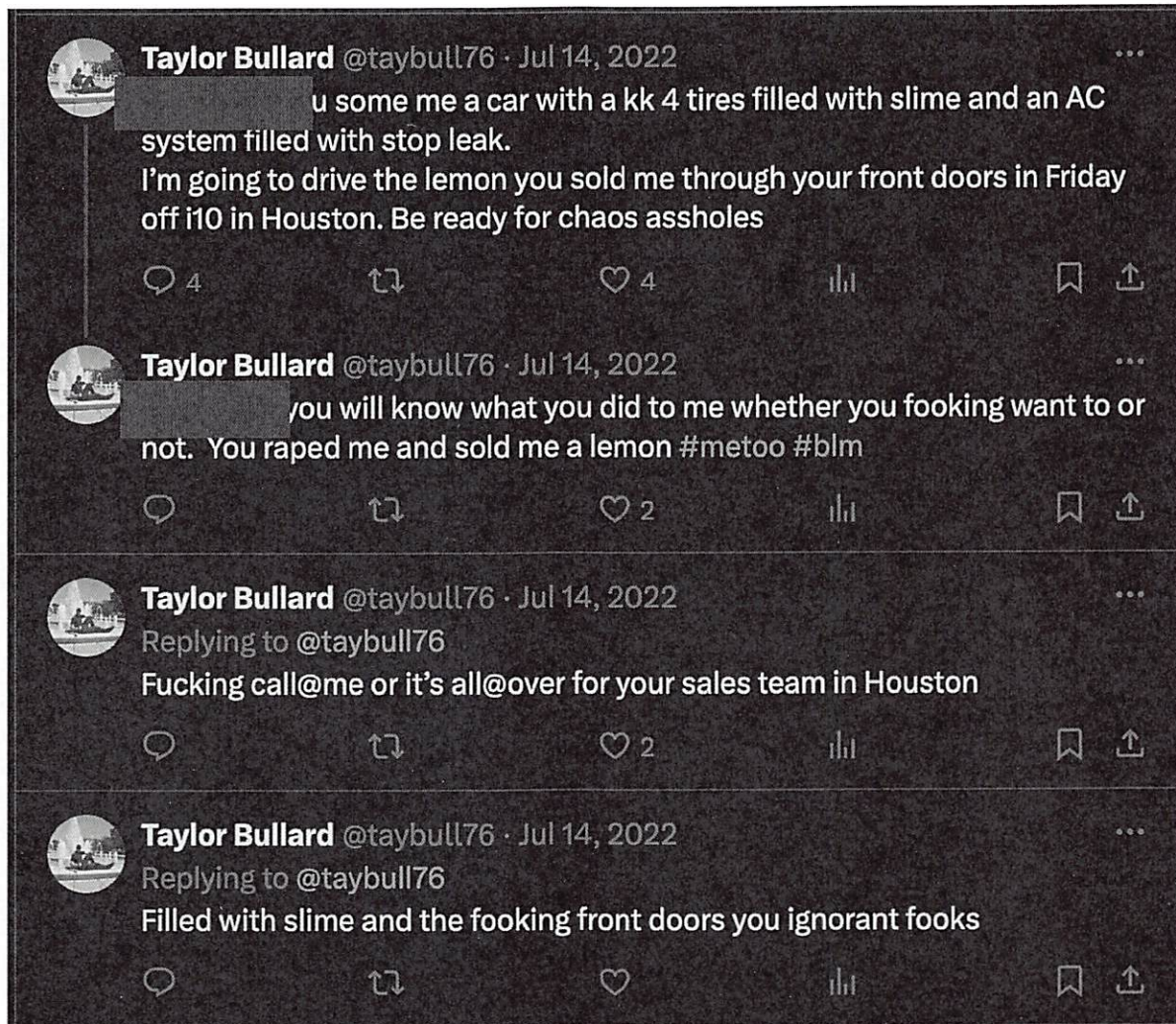


Figure 2: Threat made against

Company C *ESG
RJL

CONCLUSION

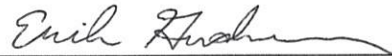
22. Based on the information and evidence set forth above, I respectfully submit that there is probable cause to believe that TAYLOR BULLARD committed the following offense:

COUNT ONE: On or about December 12, 2024, in the Eastern District of Virginia and elsewhere, BULLARD, transmitted in interstate or foreign commerce a communication containing a threat to injure the person of another, namely, the executive team of Company A.

23. Accordingly, I request that a complaint and arrest warrant be issued charging BULLARD with such offense.

FURTHER AFFIANT SAYETH NOT.

Respectfully submitted,



Erik Gudmundsen
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on December 19, 2024.



UNITED STATES MAGISTRATE JUDGE