

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Connecticut

United States of America)

v.)

MATTHEW TOLLIS)

Case No. 3:14mj206(HBF)

Defendant(s)

CRIMINAL COMPLAINT

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 _____ in the county of Hartford in the _____ District of Connecticut, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371	Conspiracy
18 U.S.C. § 844(e) & 2 -	Aiding and Abetting the Conveying of False Information Regarding Killing or Injuring Individuals, or Damaging or Destroying Property with Explosives
18 U.S.C. § 1038 & 2	Aiding and Abetting Bomb Threat Hoax

This criminal complaint is based on these facts:

See Affidavit Attached

Continued on the attached sheet.

/s/

Complainant's signature

Redacted Special Agent F.B.I.

Printed name and title

Sworn to before me and signed in my presence.

/s/

Date: 09/09/2014

Judge's signature

City and state: Bridgeport, Connecticut

Redacted

U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

STATE OF CONNECTICUT

:
:
:
:
:

ss: BRIDGEPORT

FAIRFIELD COUNTY

SEPTEMBER 9, 2014

AFFIDAVIT

I, Redacted being duly sworn, depose and say that:

1. I am a duly appointed Special Agent of the Federal Bureau of Investigation (FBI) and am assigned to the New Haven Field Office. I have been employed as an FBI Special Agent since January 2002. I am currently assigned to investigate matters involving domestic terrorism and weapons of mass destruction (WMD). I graduated from the FBI Academy and completed numerous FBI training courses related to counterterrorism, foreign intelligence, and weapons of mass destruction matters. I am a certified FBI WMD Coordinator. As a result of my training and experience, I am familiar with the tactics and methods used by individuals who engage in criminal, terrorism and intelligence related activities. I am also familiar with many investigative techniques employed to investigate these acts. Prior to becoming a Special Agent, I was a county police officer for six years.

2. As a Special Agent with the FBI, I am an investigative or law enforcement officer of the United States and am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18 of the United States Code.

The Target

3. I make this affidavit in support of an application for a warrant to arrest an adult male known as MATTHEW TOLLIS on three criminal counts, namely: one count of violating 18 U.S.C. § 371 (conspiring to engage in a bomb threat hoax); one count of violating 18 U.S.C.

§§1038 & 2 (aiding and abetting a bomb threat hoax); and one count of violating 18 U.S.C. §§ 844(e) and 2 (aiding and abetting the malicious conveying of false information regarding an attempt or alleged attempt to kill, injure or intimidate any individual, or to unlawfully damage or destroy any building or other real or personal property by means of an explosive). TOLLIS is a twenty-one year old adult male who is currently residing in Wethersfield, Connecticut. As explained more fully below, I have determined that TOLLIS was a member of a group that referred to itself as TCOB (TeAM CrucifiX or Die).¹ This group primarily consists of Microsoft X-Box players or gamers. The investigation to date has revealed that TOLLIS and others associated with TCOB have participated in making hoax threats involving bombs, hostage taking, firearms, and mass murder throughout the United States and abroad using the internet communication service Skype. As relevant here, TOLLIS has been identified as a participant in at least six incidents including hoax threats including a bomb threat to the University of Connecticut in April 2014 and other bomb threats to schools and other locations in New Jersey, Florida, Texas and Massachusetts. Moreover, based on the investigation to date, it is believed that three members of the TCOB group reside in the United Kingdom and that they have been participated in making the hoax threats from the U.K. The three individuals are known as “Verified,” “Jordie” or “Jordy” and “Declaws.” The FBI agent is actively working with authorities in the U.K. to identify the targets and request their support in prosecuting the additional targets.

4. Based on the contents of this affidavit, I submit that there is probable cause to believe and I do believe that MATTHEW TOLLIS, in the District of Connecticut and elsewhere, has conspired to make, and has participated in making, bomb threats to various locations

¹ Law enforcement has observed that the leaders of this group are now calling themselves “ISISGang.”

including the University of Connecticut on or about April 3, 2014 in violation of 18 U.S.C. §371, 18 U.S.C. §§ 1038 & 2 and 18 U.S.C. §§ 844(e) and 2.

5. I am personally participating in the investigation of violations of federal law by MATTHEW TOLLIS. The facts comprising the basis for this affidavit are derived from the following sources:

- (a) Oral and written reports of other law enforcement officers;
- (b) Interviews with other law enforcement officers;
- (c) Reliable information received during the course of the investigation;
- (d) Interviews of witnesses;
- (e) Audio recordings of various bomb threats; and
- (f) Interviews of MATTHEW TOLLIS.

Since this affidavit is being submitted for a limited purpose, I have not included each and every fact that I know concerning the investigation. I have only set forth those facts that I believe are necessary to establish probable cause for the arrest warrant sought by this application.

LEGAL AUTHORITIES

6. The general conspiracy statute, 18 U.S.C. § 371, creates an offense “[i]f two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy.” The elements of this crime require that MATTHEW TOLLIS: (1) was a party to or member of an unlawful agreement; (2) joined the agreement or conspiracy knowing of its objective; and (3) at some time during the existence of the agreement or conspiracy, at least one of its members performed an overt act in order to further the objective of the unlawful agreement.

7. 18 U.S.C. § 1038 makes it a crime to intentionally convey false or misleading information about, among other things, the alleged use, attempted use or threatened use of explosive devices, under circumstances where such information may reasonably have been believed. Specifically, the statute provides that a person shall be guilty of a felony if he or she engages in “*any conduct* with the intent to convey false or misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity has taken, is taking, or will take place” that would constitute a violation of specified predicate statutes including violations of Title 18 chapter 40, which, for present purposes, includes 18 U.S.C. § 844(f)(1).²

8. 18 U.S.C. § 844(e) provides that “[w]hoever, through the use of the mail, telephone, telegraph, or other instrument of interstate or foreign commerce, or in or affecting interstate or foreign commerce, willfully makes any threat, or maliciously conveys false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive shall be [guilty of a felony].”

9. 18 U.S.C. § 2 provides that anyone who either: (a) aids, abets, counsels, commands, induces or procures the commission of a crime; or (b) willfully causes an act to be done which if directly performed by him or another would be an offense against the United States, is punishable himself as a principal.

² 18 U.S.C. § 844(f)(1) makes it a crime to “maliciously damage[] or destroy[], or attempt[] to damage or destroy, by means of . . . an explosive, any building . . . or other personal or real property in whole or in part owned or possessed by or leased to . . . any institution or organization receiving Federal financial assistance.”

FACTS AND CIRCUMSTANCES

A. BACKGROUND OF THE INVESTIGATION

10. Based on information obtained to date, I have probable cause to believe TOLLIS met the other members of TCOOD on the internet. Many members of this group have communicated about their gaming activities. More specifically, many members of this group are involved in the X-box gaming world where players participate in online/network based games and tournaments through their Xbox.

11. In various interviews, TOLLIS has admitted in substance and in part the following: (a) that he was associated with TCOOD which engaged in making swatting (defined below); (b) that he participated with other members of TCOOD in making at least six separate swatting calls during which law enforcement responded; (c) that at times TCOOD communicated among its members about potential targets in advance of making the swatting calls; (d) that TOLLIS was aware that law enforcement responded and that he did not inform law enforcement; and e) he was aware that members of this group have made numerous other swatting calls which he did not join. TOLLIS informed federal law enforcement authorities that he never spoke during the swatting calls but admitted that he had laughed in the background of the calls.

12. "Swatting" is the making of a hoax call to any emergency service to illicit an emergency response based on the false report of an on-going critical incident. Incidents typically produce the deployment of SWAT units, bomb squads, and other police units, as well as the evacuations of schools, businesses and residences. In this case, members of TCOOD utilized Skype to make these calls. Swatters attempting to target a victim will often generate a group Skype-to-Skype call and then add an emergency service number to the call. One swatter will speak while the rest listen. The swatter will then make a false report as if he is the "victim" or

perpetrator. By way of example, the swatter will pretend to be the victim, providing the victims address and make a claim of a bomb threat or on-going assault. That call will then cause a SWAT team or other police response to the "victim's" location, which is often a school or residence.

13. As set forth in more detail below, TOLLIS stated that he became involved with this group after being bullied on-line. TOLLIS claimed that he was "doxed."³ TOLLIS admitted that he began following "Declaws" and "Verified" because it discouraged others from bullying him.

14. As set forth more fully below, this affidavit sets forth the incidents that I believe TOLLIS has directly been involved with and this affidavit also sets forth other additional incidents involving members of TCOD.

B. SWATTING INCIDENTS INVOLVING TOLLIS

15. The swatting incidents set forth below are incidents in which I do believe TOLLIS was involved. Based on TOLLIS' own admissions, he joined these swatting calls. The first call is

³ A dox is a very detailed online posting of personal information. The subject of a dox will often find their real name, address, school, college, social security number, bank accounts, email accounts, usernames, and passwords and other personal identifying information posted on websites like "pastebin" or "doxbin." In addition, the dox may contain the same information posted about the subject's family members and other personal associations. Most dox reports posted contain enough information that, if true, the subject and their family's identity can be easily stolen or assumed.

The information contained in the dox report could be outdated or inaccurate. People who create the dox reports pride themselves on only including correct information because it builds their credibility and standing. The more valid dox reports someone creates, the more skill they are perceived to have. In the on-line community, individuals who are able to post accurate dox reports are both feared and sought after by those who seeking to target someone. When someone acts on the information contained in a dox report, that resulting action is referred to on-line as a "rape." In this case, the actions included, pizza bombs where members of the group have sent unpaid pizzas to the target's house, flooding their internet connection with network traffic which would get them removed from the internet, assuming someone's Twitter account and posting false or misleading information, extorting individuals seeking to regain control of their Twitter account by requiring the individual to, among other things, send nude photos of themselves, or calling the police to report an incident that would require specialized units like SWAT or the bomb squad to respond (swatting).

the swat call made to the University of Connecticut. The rest of the calls are set forth in chronological order.

April 3, 2014 Threat to the University of Connecticut

16. On or about April 3, 2014, the University of Connecticut's general number was called using the internet-based communication service Skype. The telephone number used to call the University of Connecticut was a Skype default telephone number. The caller then pressed "1" from the main menu and was connected to the University's Admissions Department. The caller was then connected to a representative. Once connected to a representative, the caller stated that plastic explosives had been placed in the Gordon W. Tasker Admissions Building at the Storrs Campus in order to kill people. The University's police department was notified and immediately responded to the Tasker Building and evacuated it. The police also immediately placed an emergency alert to the University community. In addition to the University of Connecticut's Police Department, the Connecticut State Police's Bomb Squad, Emergency Services Unit, and SWAT teams responded and arrived on scene. The Connecticut State Police's Bomb Squad and SWAT team conducted a check of the building and determined that there were no explosive devices. The University was placed in lock down for approximately three hours while law enforcement searched the University. All roads surrounding the building that was targeted were closed. Based on witness accounts, individuals in the building were afraid for themselves and others. Based on information received by law enforcement, a Skype call assigned to the username "VERIDIOT" made the threat. On or about April 3, 2014, a University of Connecticut police officer, who will be identified in this affidavit as Officer #1, learned about a Twitter account with the user name "@declaws" who was taking responsibility for the bomb threat at the Tasker Building. A review of the Twitter feed for @declaws produced the following Twitter thread:

@Exquisite_Gent: There really might be a bomb at UCONN
#oolord #staysafe #imouttahere

@declaws: there isn't ;)

@Exquisite_Gent: says who

@declaws: says the people who placed the threat :3

@Exquisite_Gent: u placed it

@declaws: well @inb4mad did the call #fuckthefeds #uconn
[smiley face with glasses]

@Exquisite_Gent: were u there with him when he did it

@declaws: prntscr.com/36myyf

17. The last post sent by @declaws to @Exquisite_Gent included what appears to be a screenshot image of a multiple person Skype call between Skype display names "hacked by verified," "Harbor," "Junior," and "OTF Jordie." This screenshot capture is believed to be the Skype call that placed the bomb threat to University of Connecticut's Admissions Department. Law enforcement was able to identify the account holder of the Skype display name "Harbor" as MATTHEW TOLLIS, with an address that law enforcement was able to confirm is where TOLLIS resides.

18. On April 29, 2014, University of Connecticut Officer #1 called TOLLIS. During that telephone call, TOLLIS initially told Officer #1 that he did not know why he was being called and then later during the same telephone call asked Officer #1 was related to the bomb threat. During the April 29, 2014, telephone call, TOLLIS stated that he was following @declaws and @inb4mad because he met them through video games. When he learned through the media that they sent the bomb threat to UConn, TOLLIS stated that he stopped following them. TOLLIS

agreed to voluntarily be interviewed on May 1, 2014 at the University of Connecticut Police Department.

19. On April 29, 2014, immediately following TOLLIS' telephone conversation with Officer #1, TOLLIS posted the following tweets using the Twitter username "Harbor@hxrbor":

@Hxrbor: my friends at the FBI called me again..... same with UCONN police.... wtf

@Snarled: lololol

@Politician: uh oh you're about to get your anon mask taken

@Hxrbor: they want to meet with me.....

@Politician: decline decline decline decline decline decline decline

@Hxrbor: Nigga said he was about to drive to my house

@Hxrbor: the fuck is going on

@Hxrbor: this may be it for me boys

@Snarled: are you srs...lol

@Hxrbor: being 100 percent serious :P

@Snarled: youre nawt affiliated with it tho

@Hxrbor: "We think you can help us out with our investigation"

@Snarled: oh jfc DON'T GIVE IN

@Politician: nah man nah man nah man say they have the wrong number. Blame the dog. Something.

@Hxrbor: I don't want the fbi to kick in my door or nothing
Yeah they have been doing that a lot recently

@Hxrbor: I really don't want to drive all the way to storrs man
fuck

@Politician: when in doubt blame Steven

@Throwing C4s: jfc

@Hxrbor: [deleted post reporting UConn Officer #1 read his dox report]

@Snarled: fuk mannn that's illegal...theyre gonna swat you

@Hxrbor: lmao

20. On May 1, 2014, Tollis contacted Officer #1 and asked that the interview take place at his residence, rather than the University of Connecticut Police Department. Officer #1 agreed, and he and another officer interviewed TOLLIS in person at his home on the same day. During that interview, TOLLIS stated that he used a computer and computer equipment at his residence to join the Skype calls and more generally to communicate with other individuals on those calls. These calls included the bomb threats called into Allentown High School and St. John Vianney High School in January 2014 and the call to the University of Connecticut on April 3, 2014. TOLLIS further admitted that individuals using the Twitter usernames "declaws" and "inb4mad" (who is known as "Verified") also participated in the conference calls.

21. TOLLIS explained that his association with TCOB began after an individual in Oregon began to bully him on-line which included creating a dox report on him and extended to "pizza bombs." TOLLIS explained that a pizza bomb was when a pizza delivery man showed up at your house with several unpaid pizzas. TOLLIS explained that he began to look for ways to protect himself and his family from on line abuse. TOLLIS admitted that he began following "Declaws" and "Verified" because it discouraged others from bullying him. TOLLIS claimed that he was not initially aware of the swattings but as described above, he admitted to some of the calls that he had joined. TOLLIS also stated that he did not want to become a target so he did not

inform law enforcement about the swatting incidents. TOLLIS told law enforcement that “I stood by and watched as resources were wasted for hoax calls.”

22. In a separate interview with FBI special agents, TOLLIS admitted that he was expecting the FBI to show up and stated that he was present for the entire swat call made to the University of Connecticut. TOLLIS also identified the other members of the group present on the swat call including “Verified”, “Declaws”, “Jordy” and “Junior.” TOLLIS stated that Verified’s name is [Redacted] and that he (Verified [Redacted]) is from Scotland.

23. As set forth in detail below, a second swat call was made to the University of Connecticut on August 18, 2014. Based on information obtained during the course of this investigation, I do believe that this call was made by members of TCOD.

January 14, 2014 Threat to Hebron High School, Carrollton, Texas

24. On or about January 14, 2014, Hebron High School in Carrollton, TX was the victim of a swatting phone call. Hebron High School was evacuated and the Carrollton Special Weapons and Tactics Team responded to clear the school. The subject used a Skype default number. The swatting consisted of a phone call reporting a student at Hebron High School had a firearm and/or a bomb. The subject making the swatting Skype call used the Skype account inb4mad, and posted tweets on his twitter accounts: BLEACH@inb4mad, ALEX POLANSKI@inb4mad, @JONATHAN JONES@inb4mad. When TOLLIS was asked directly what swatting calls he participated in, he listed this incident.

January 15, 2014 - Threat to St. John Vianney High School, Homdel, NJ

25. On or about January 15, 2014, the Holmdel, New Jersey Police Department was called using a Skype default telephone number. The phone number called was Homdel Police Department’s general number. The person who called the Homdel Police Department stated, in

substance and in part, that he was at the St. John Vianney High School in Homdel, and that a masked man had grabbed him in the bathroom. According to the caller, the masked man stated that he was going to blow up the school. The caller also stated that the masked man was armed with a pistol and that the masked man stated that he had sarin gas. The caller stated that he ran out of the high school and then called the police. Holmdel Police immediately responded to St. John Vianney High School and evacuated the building. Each room was cleared and all the students and staff were instructed to exit the rear of the building.

26. A New Jersey FBI Agent who was in the area of St. John Vianney High School at approximately 11:45 a.m. observed students running from the school visibly shaken. Over 1,000 students plus faculty and staff had to be evacuated to St. Benedicts Church in Holmdel, NJ. In addition to the Homdel Police, the Monmouth County Emergency Response Team (“MOCERT”), the FBI, Monmouth County Prosecutor’s Office, Monmouth County Sherriff’s Department, and the Monmouth County K-9 Explosive Detection Unit, among other units, responded to the scene. MOCERT conducted a building check of the interior and roof tops while clearing the building. The K-9 Explosive Unit Teams conducted a check of the building and determined that there were no explosive devices. Moreover, no evidence was found of an armed masked man or anyone else seeking to bomb the high school. Based on information obtained during the investigation, law enforcement was able to determine that the Skype account used to make the call was assigned to the username “VERIFIEDDD.”

27. On or about January 15, 2014, a Twitter user tweeted information and photographs of the law enforcement response and evacuation of St. John Vianney High School to another Twitter Account, with the Twitter username “@inb4mad.” The Twitter user @inb4mad tweeted information taking responsibility for calling in the hoax at St. John Vianney High School. Further

investigation and an analysis of the photographs tweeted revealed that the account holder is a minor who was a student who attended St. John Vianney High School at the time of the incident. Based on a review of the tweets and other information, the minor student had spoken on Twitter with @inb4mad, who told the minor student that he was going to call in a hoax at St. John Vianney High School that would result in a SWAT team being sent there. Based on information received by Twitter, @inb4mad logged into the account from the same IP Address that was used by the individual who made the Skype call to the Homdel Police Department about the bomb threat at St. John Vianney High School. This information corroborates TOLLIS' statement that inb4mad and Verified are the same person. TOLLIS has admitted that he was aware that Verified, a member of the TCOD group, was paid by the minor to make the hoax call. TOLLIS stated he saw a screen shot of a direct message between Verified and the minor regarding the payment in exchange for the hoax call. According to TOLLIS, although they payment was agreed upon, he did not know whether the payment was actually made. TOLLIS further stated that he participated on this call but claims that he was eating and showering while the call was being made. When asked directly by law enforcement what calls he participated in, TOLLIS listed this incident. Law enforcement reported that during this incident a child suffered a concussion when law enforcement responding to the scene breached a door that the child was hiding behind.

January 16, 2014 Threat to Allentown High School, Upper Freehold, NJ

28. On or about January 16, 2014 the New Jersey FBI met with Holmdale Police and learned that a similar situation was unfolding at the Allentown Regional High School (ARHS). A male caller had called the main telephone number at ARHS claiming a bomb had been placed in the lavatory. ARHS is a K-12 school of 3,000 students. Because the caller had not specified which school, NJ State Police ordered the entire school system be evacuated. TOLLIS told law

enforcement that he was aware about the Allentown swatting in advance of the incident and admitted that he participated in that call. More generally, TOLLIS admitted that he knew of specific instances where members of the group had communications about swatting targets in advance of the swat call. By way of example, TOLLIS stated that a member of the group had posted their desire to swat schools. In response to some of these postings, members of the on-line community would request to be added on to the Skype call.

April 3, 2014 Threat to Boston University

29. On Thursday, April 3, 2014 at 10:18 AM, the Boston Police Department received a complaint that there was a call placed to the Boston University Admissions Office. The admissions office reported that a male caller, with a foreign accent, stated, "I put C4 explosives in the admissions office and housing." The suspect also stated that he had an assault rifle and was waiting outside. The Boston Police Department and other agencies cleared the area and no explosives or firearms were discovered.

30. During this incident, Boston law enforcement located information through social media that the University of Connecticut (UCONN) was also experiencing an active bomb threat. TOLLIS admitted to federal agents that he was on the swatting call for Boston University and confirmed the others on the call included "Jordie," "Verified" and "Junior." As noted above both Jordie and Verified are believed to be residing in the United Kingdom.

April 3, 2014 Threat to University High-School, Florida

31. TOLLIS stated that he was also on a swatting call also placed on April 3, 2014, to University High School in Florida with @Declaws, @Eviljordie, Verified and Junior. TOLLIS stated that @Declaws had a long distance relationship with a girl who attended University High School. According to TOLLIS, @EvilJordie spoke on that call. TOLLIS stated his belief that

@Eviljordie is Redacted from the United Kingdom. TOLLIS claimed that he was taking a shower during the call and did not hear what was said. Based on other information obtained during this investigation, federal law enforcement believes that EvilJordie resides in the United Kingdom.

April 11, 2014 Threat to Boston Convention & Exhibition Center

32. On April 11, 2014 at approximately 3:50 PM, the Boston Convention & Exhibition Center (BCEC), located in Boston, MA, received a call-in bomb threat from the same number as the UConn and Boston University bomb threats.

33. A public safety employee was able to keep subject on the phone for five minutes during which the following information was extracted. The caller, who identified himself as Matt Hag, stated that the evening before, he had placed explosives around the building. The caller stated that he was also watching the BCEC from his jeep and was going to attack with an assault rifle weapon to kill as many people as possible. Hag claimed that he was an Iraqi national who migrated to the United States in 2006 and was working for Allah. Hag claimed that he was upset that innocent Iraqis were being killed and stated that his children were murdered by Marines. The area was swept by bomb squads and no explosives were found. At the time this incident occurred, the PAX East Gaming Show was scheduled to take place at the BCEC with 60,000 expected attendees.

34. Law enforcement determined that the same Skype telephone number was used to make the threatening calls to BCEC, Boston University and UConn. Boston law enforcement was also able to identify two tweets from user: @inb4mad that stated: "Who's tryna watch PAX East with me :)" and "It would be asahme if "Matt Haag" said he was armed with an ar15 assault rifle and plastic explosives". [sic]

35. TOLLIS admitted that he was on the swatting call made to the BCEC. TOLLIS further stated that Verified/inb4mand placed the call and said “he had an AR-15, there are bombs around, I have bombs, I’m going to shoot-up, people.”

TOLLIS’ Connecticut State Arrest

36. On September 3, 2014, TOLLIS was arrested by the University of Connecticut Police Department and charged with four separate charges relating to the swatting incident at the University of Connecticut on April 3, 2014. TOLLIS was released after posting a \$10,000 bond.

37. On September 5, 2014, the day after TOLLIS’s arrest, a call was made directly to the University of Connecticut Police Department. The caller initially identified himself as Sergeant Robert Barr and informed the dispatcher that he was calling about MATTHEW TOLLIS. The caller went on to say that he was calling from Scotland and that he (the caller) admitted responsibility for making the bomb threat to the University of Connecticut and confirmed that Matthew was on the call. In addition to making threats to “drop” additional bombs at the University of Connecticut Police Department and the University of Connecticut, the caller identified by name a police officer who works at the University of Connecticut Police Department who the caller intended to target. Moreover, the caller made reference to 9/11 as the day the “towers” were “blown up” and also stated that this was the same day that TOLLIS was scheduled to appear for an upcoming appearance in state court. The caller stated that he (the caller) would call in a bomb threat to the court on that date stating that TOLLIS is in possession of bombs. The caller went on to say that he does not play “COD” -- (believed to be referring to the X-box game Call of Duty) -- he “would rather play God.”

D. Swatting Calls made by Members of the TCOD Group

38. Based on the FBI's investigation to date, the following swat calls were also made by members of the TCOD group.

April 15, 2014 Swatting Hoax Threat for Hire in Willimantic, CT

39. On Tuesday April, 15, 2014 at approximately 12:00p.m., Willimantic, CT Police responded to a residence after the police received a call reporting that there was a man with a firearm in that particular, specific residence. The caller / gunman identified himself as "Robert" and claimed that he had just shot his mother. "Robert" claimed to be still in the house with a gun. The residence was in close proximity to various schools, including Windham High School, ECSU, Natchaug Elementary School and Kramer School, which were all placed in lock down.

40. Law enforcement responded to the residence (with weapons drawn), while a hostage negotiator engaged with "Robert" remotely via telephone. The caller / "Robert" informed law enforcement that he was inside the residence and he refused to come outside. One adult and four juveniles were actually inside the residence during this conversation. Eventually, it was determined that the call was a hoax. Upon further investigation, it was determined that a juvenile suspect paid "EvilJordie" \$30 to swat this specific residence. This payment was made through paypal. Law enforcement recovered chat logs between the juvenile suspect and EvilJordie that detail the juvenile soliciting and arranging payment to EvilJordie for this hoax. State charges were brought against the juvenile suspect. As set forth above, "Jordie" is a member of the TCOD group, who federal law enforcement believes resides in the United Kingdom, and he has been involved in several swatting calls.

July 5, 2014 Threat to Harvard University

41. On Saturday, July 5, 2014, at approximately 9:30 a.m., the Harvard Police Department received a call from a male stating that he was in the university's Science Center. The caller that said he and his friend had been planning an attack on Harvard for the last three weeks. The caller told law enforcement that they had placed bombs in dormitories and the law center which would detonate in seventeen (17) minutes. The caller provided the names of four specific Harvard dormitories and also added that they were armed with AR15 assault rifles. When asked which dorms, the caller stated [Redacted] and [Redacted]. With the assistance of Cambridge P.D., Harvard P.D. ordered an evacuation. During the search, law enforcement observed a suspicious package which prompted the dispatch of Cambridge Fire and Cambridge Special Response Team (SRT). The MA Transit Police K9, Boston Police K9, FBI Bomb Technicians and Boston Police also responded to this incident. Each area was systematically cleared. After almost 5 hours of searches, it was determined that there were no explosive devices or armed men.

42. During this incident, Boston law enforcement observed twitter communications from the twitter accounts @SloneUser and @declaws, claiming responsibility for the threat.

August 2, 2014 Threat in Newton, MA

43. On August 2, 2014, the Newton Police Department Dispatch received a swat call from a Skype telephone number. During this call, the caller stated that he was in the bathroom of the American Gaming League with a Glock .40 and an AR-15 "fully loaded and ready to go." The individual also stated that he wanted to kill everyone. The American Video Game League is a business located in Newton, Massachusetts. According the American Video Game League website - <http://avgleague.com/>, this business provides a physical location in which individuals

can rent computers for the purpose of playing video games against both local and online competitors.

44. As a result of this incident, a request was made from the Middlesex District Attorney's Office to issue an administrative subpoena to Twitter, Inc. for subscriber information relating to the "King Flashbang @eviljordie" Twitter account. The Middlesex County District Attorney's office subsequently approved this request and issued an administrative subpoena. Within the administrative subpoena, it was requested that Twitter, Inc. provide the information to a paralegal in their office. It is Twitter's policy to notify users of requests for their account information absent a statute or court order prohibiting them from doing so. Twitter notified the account holder of the subpoena request without advance notice to law enforcement authorities involved in the ongoing investigation.

45. Twitter, Inc. appears to have provided the subscriber with an exact copy of the administrative subpoena issued to Twitter, Inc. as part of their notification process. A review of the @eviljordie Twitter page revealed that the administrative subpoena appeared in a posting by the account user on the @eviljordie Twitter page shortly after the subpoena request was served to Twitter, Inc.

46. On August 16, 2014, the Middlesex District Attorney's Office received a series of calls from a Skype number. The caller left a message for the very paralegal whose name was included on the subpoena. The following is a transcript of that call:

Um, hello [name redacted] [indcipherable], this is Robert Lewis Barr. I'm calling in to the subpoena, actually, I received in the email. Um, I just want you to stick up—stick that subpoena up your ass. Um, yeah, I'm, I'm ordering a hit man on you, really. So, you're gonna die, you fucking whore! You think you're taking me, bitch? I'm taking your fucking life, okay? You're speaking to Robert Lewis Barr. You can find me on [indcipherable]. You come out here, bitch. I will take your fucking life, [name redacted]!

The above is a phonetic transcription of the voice message provided by the Massachusetts State Police Officer assigned to the Special Investigations Unit of the Middlesex County District Attorney's Office who is assigned to investigate these threats.

47. On the same date, at approximately 4:30a.m. in the morning, the paralegal had also received a call at her home. She answered this call but the caller remained silent and did not attempt to communicate. The caller then hung up. This was followed by another call during which the male caller left a voicemail message. The following is a transcript of that call provided by the Massachusetts State Police Officer assigned to investigate this matter:

Yo, [name redacted], you need to fuckin' wake up. The SWAT are on their way, bitch. This is Robert calling you on your mobile. Pick up, whore.

August 18, 2014 Threat to University of Connecticut

48. On August 19, 2014, at approximately 10:55a.m., UConn 911 dispatch received a call from an employee of the Tasker Building. The complainant told dispatch that she had received a bomb threat against the campus. The complainant explained that the caller indicated that a bomb would detonate within fifteen minutes "around the campus." The complainant also said that the employees of the building were evacuating and that she would meet officers outside. Law enforcement responded and spoke with the complainant who explained that the caller was male and spoke with a foreign accent. The caller referenced "Mohammed" several times, specified that the bombs were "napalm," and also stated that all non-believers would die. The call lasted about two minutes and ended with the male hanging up. As a precaution, the Tasker Building was checked by officers for suspicious items while the building was evacuated and eventually cleared.

49. Connecticut FBI and Connecticut State Police were notified of the incident and were put on standby should any further developments occur. Twitter feeds indicated that users @spiky and @EvilJordie were responsible for this threat.

August 18, 2014 Threat to Sandy Hook Elementary School, CT

50. On August 18, 2014, a complainant reported to FBI New Haven that a “Friend of a Friend” using twitter account @spiky had sent bomb threats to places like the University of Connecticut and Sandy Hook (referring to Sandy Hook elementary school in Newtown, CT) . The complainant reported that this individual had been calling police departments located near people he does not like, falsifying information by reporting that they have a bomb so the individual gets “swatted” and evacuated from their home. The complainant reported that s/he only knows this person through social networking, but that there were posts on Twitter by @spiky claiming that he sent bomb threats to Sandy Hook, UConn and Boston University. In this post, @spiky stated, “uconn easy asf to bomb threat im doing andy hook fuck with me” Local law enforcement authorities have reported that @spiky was registered using the e-mail verifiedriseup.net. Monroe Police confirmed that a threatening telephone call was made to the Sandy Hook Elementary School (which is now located in Monroe, CT). The caller identified himself as “Mohammed Jamile” and told an employee at the school that he was coming to the school in 50 minutes with an assault rifle to “kill all your asses.”

August 18, 2014 Threat to Boston University

51. Also on August 18, 2014, at approximately 11:43 a.m., law enforcement responded to the location of another threat. Boston University received a phone call from a male stating, “Listen to me carefully, I am coming to the campus to shoot everyone up.” This call came back to a Skype number. As detailed above, @spiky claimed responsibility for this act.

REQUEST FOR SEALING

52. Your affiant requests that the criminal complaint, affidavit, attachments and any associated documents be sealed until the execution of the arrest warrant and the federal arrest of TOLLIS. The government further requests that in light of the retaliatory threats to members of law enforcement and others involved in investigating the members of this group, that the name of the FBI affiant as well as Your Honor's name remain redacted even after the affidavit is unsealed.

CONCLUSION

53. Based on all the foregoing there is probable cause to believe, and I do believe that MATTHEW TOLLIS has committed violations of 18 U.S.C. § 371 (conspiring to engage in a bomb threat hoax); one count of violating 18 U.S.C. §§1038 and 2 (aiding and abetting the conveying of false information and hoaxes); and one count of violating 18 U.S.C. §§ 844(e) and 2 (aiding and abetting the malicious conveying of false information regarding an attempt or alleged attempt to kill, injure or intimidate any individual, or to unlawfully damage or destroy any building or other real or personal property by means of an explosive).

54. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/

SPECIAL AGENT [Redacted]
FEDERAL BUREAU OF INVESTIGATION

Sworn and subscribed to before me this 9th day of September 2014, at

Bridgeport, Connecticut.

/s/

[Redacted]
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
for the
District of Connecticut

United States of America
v.
Matthew Tollis
Defendant

Case No. 3:14mj206 (HBF)

United States District Court
District of Connecticut
FILED AT BRIDGEPORT

ORDER SETTING CONDITIONS OF RELEASE

Sept 12 2014
Hesteria D. Tebora, Clerk
Deputy Clerk

IT IS ORDERED that the defendant's release is subject to these conditions:

- (1) The defendant must not violate federal, state, or local law while on release.
(2) The defendant must cooperate in the collection of a DNA sample if it is authorized by 42 U.S.C. § 14135a.
(3) The defendant must advise the court or the pretrial services office or supervising officer in writing before making any change of residence or telephone number.
(4) The defendant must appear in court as required and, if convicted, must surrender as directed to serve a sentence that the court may impose.

The defendant must appear at: U.S. DISTRICT COURT, BRIDGEPORT
Place

on Monday, Nov. 10, 2014 for probable cause hearing
Date and Time

If blank, defendant will be notified of next appearance.

- (5) The defendant must sign an Appearance Bond, if ordered.

\$100,000 bond

To be co-signed by MARY KELLEHER and partially secured by property equity

ADDITIONAL CONDITIONS OF RELEASE

IT IS FURTHER ORDERED that the defendant's release is subject to the conditions marked below:

MT (X) (6) The defendant is placed in the custody of:
 Person or organization _____
 Address (only if above is an orga) _____
 City and state _____ Tel. No. _____

who agrees to (a) supervise the defendant, (b) use every effort to assure the defendant's appearance at all court proceedings, and (c) notify the court immediately if the defendant violates a condition of release or is no longer in the custodian's custody.

Signed: _____

9/12/14
Date

- MT (X) (7) The defendant must:
- MT (X) (a) submit to supervision by and report for supervision to the U.S. Probation office as directed
 telephone number _____, no later than _____
 - MT (X) (b) continue or actively seek employment. must be approved by probation
 - MT (X) (c) continue or start an education program.
 - MT (X) (d) surrender any passport to: _____
 - MT (X) (e) not obtain a passport or other international travel document.
 - MT (X) (f) abide by the following restrictions on personal association, residence, or travel: reside with custodian; not leave Connecticut without permission of court/probation
 - MT (X) (g) avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution, including: the gang identified in affidavit
 - MT (X) (h) get medical or psychiatric treatment: as directed, including substance abuse evaluation and mental health treatment/evaluation
 - () (i) return to custody each _____ at _____ o'clock after being released at _____ o'clock for employment, schooling, or the following purposes: _____
 - () (j) maintain residence at a halfway house or community corrections center, as the pretrial services office or supervising officer considers necessary.
 - MT (X) (k) not possess a firearm, destructive device, or other weapon.
 - MT (X) (l) not use alcohol () at all (X) excessively.
 - MT (X) (m) not use or unlawfully possess a narcotic drug or other controlled substances defined in 21 U.S.C. § 802, unless prescribed by a licensed medical practitioner.
 - MT (X) (n) submit to testing for a prohibited substance if required by the pretrial services office or supervising officer. Testing may be used with random frequency and may include urine testing, the wearing of a sweat patch, a remote alcohol testing system, and/or any form of prohibited substance screening or testing. The defendant must not obstruct, attempt to obstruct, or tamper with the efficiency and accuracy of prohibited substance screening or testing.
 - MT (X) (o) participate in a program of inpatient or outpatient substance abuse therapy and counseling if directed by the pretrial services office or supervising officer.
 - MT (X) (p) participate in one of the following location restriction programs and comply with its requirements as directed.
 - () (i) **Curfew.** You are restricted to your residence every day () from _____ to _____, or () as directed by the pretrial services office or supervising officer; or
 - MT (X) (ii) **Home Detention.** You are restricted to your residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer; or
 - () (iii) **Home Incarceration.** You are restricted to 24-hour-a-day lock-down at your residence except for medical necessities and court appearances or other activities specifically approved by the court.
 - MT (X) (q) submit to location monitoring as directed by the pretrial services office or supervising officer and comply with all of the program requirements and instructions provided.
 (X) You must pay all or part of the cost of the program based on your ability to pay as determined by the pretrial services office or supervising officer.
 - MT (X) (r) report as soon as possible, to the pretrial services office or supervising officer, every contact with law enforcement personnel, including arrests, questioning, or traffic stops.
 - MT (X) (s) Sign all necessary releases by disclosure of treatment information to the court / U.S. Probation
 - MT (X) no access to internet, twitter, Skype, internet capable devices, including gaming devices.

ADVICE OF PENALTIES AND SANCTIONS

TO THE DEFENDANT:

YOU ARE ADVISED OF THE FOLLOWING PENALTIES AND SANCTIONS:

Violating any of the foregoing conditions of release may result in the immediate issuance of a warrant for your arrest, a revocation of your release, an order of detention, a forfeiture of any bond, and a prosecution for contempt of court and could result in imprisonment, a fine, or both.

While on release, if you commit a federal felony offense the punishment is an additional prison term of not more than ten years and for a federal misdemeanor offense the punishment is an additional prison term of not more than one year. This sentence will be consecutive (*i.e.*, in addition to) to any other sentence you receive.

It is a crime punishable by up to ten years in prison, and a \$250,000 fine, or both, to: obstruct a criminal investigation; tamper with a witness, victim, or informant; retaliate or attempt to retaliate against a witness, victim, or informant; or intimidate or attempt to intimidate a witness, victim, juror, informant, or officer of the court. The penalties for tampering, retaliation, or intimidation are significantly more serious if they involve a killing or attempted killing.


If, after release, you knowingly fail to appear as the conditions of release require, or to surrender to serve a sentence, you may be prosecuted for failing to appear or surrender and additional punishment may be imposed. If you are convicted of:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more – you will be fined not more than \$250,000 or imprisoned for not more than 10 years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years – you will be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony – you will be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor – you will be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender will be consecutive to any other sentence you receive. In addition, a failure to appear or surrender may result in the forfeiture of any bond posted.

Acknowledgment of the Defendant

I acknowledge that I am the defendant in this case and that I am aware of the conditions of release. I promise to obey all conditions of release, to appear as directed, and surrender to serve any sentence imposed. I am aware of the penalties and sanctions set forth above.



 Defendant's Signature

 City and State

Directions to the United States Marshal

- () The defendant is ORDERED released after processing.
- () The United States marshal is ORDERED to keep the defendant in custody until notified by the clerk or judge that the defendant has posted bond and/or complied with all other conditions for release. If still in custody, the defendant must be produced before the appropriate judge at the time and place specified.

Date: 9/12/2014



 Judicial Officer's Signature

HOLLY B. FITZSIMMONS, U.S. MAGISTRATE JUDGE

 Printed name and title

AO 98 (Rev. 12/11) Appearance Bond

UNITED STATES DISTRICT COURT

for the

District of Connecticut

United States of America

v.
Matthew Tollis

Defendant

Case No. 3:14mj206 (HBF)

United States District Court
District of Connecticut
FILED AT BRIDGEPORT
Sept 12 2014
Roberta D. Tabora, Clerk
Deputy Clerk

APPEARANCE BOND

Defendant's Agreement

I, Matthew Tollis (*defendant*), agree to follow every order of this court, or any court that considers this case, and I further agree that this bond may be forfeited if I fail:

- to appear for court proceedings;
- if convicted, to surrender to serve a sentence that the court may impose; or
- to comply with all conditions set forth in the Order Setting Conditions of Release.

Type of Bond

- (1) This is a personal recognizance bond.
- (2) This is an unsecured bond of \$ _____.
- (3) This is a secured bond of \$ 100,000, secured by:
 - (a) \$ _____, in cash deposited with the court.
 - (b) the agreement of the defendant and each surety to forfeit the following cash or other property (*describe the cash or other property, including claims on it – such as a lien, mortgage, or loan – and attach proof of ownership and value*): Home in Connecticut

If this bond is secured by real property, documents to protect the secured interest may be filed of record.

- (c) a bail bond with a solvent surety (*attach a copy of the bail bond, or describe it and identify the surety*):

Forfeiture or Release of the Bond

Forfeiture of the Bond. This appearance bond may be forfeited if the defendant does not comply with the above agreement. The court may immediately order the amount of the bond surrendered to the United States, including the security for the bond, if the defendant does not comply with the agreement. At the request of the United States, the court may order a judgment of forfeiture against the defendant and each surety for the entire amount of the bond, including interest and costs.

AO 98 (Rev. 12/11) Appearance Bond

Release of the Bond. The court may order this appearance bond ended at any time. This bond will be satisfied and the security will be released when either: (1) the defendant is found not guilty on all charges, or (2) the defendant reports to serve a sentence.

Declarations

Ownership of the Property. I, the defendant – and each surety – declare under penalty of perjury that:

- (1) all owners of the property securing this appearance bond are included on the bond;
- (2) the property is not subject to claims, except as described above; and
- (3) I will not sell the property, allow further claims to be made against it, or do anything to reduce its value while this appearance bond is in effect.

Acceptance. I, the defendant – and each surety – have read this appearance bond and have either read all the conditions of release set by the court or had them explained to me. I agree to this Appearance Bond.

I, the defendant – and each surety – declare under penalty of perjury that this information is true. (See 28 U.S.C. § 1746.)

Date: 9-12-14

[Signature]
Defendant's signature

[Signature]
Surety/property owner – printed name

[Signature] - 9/12/14
Surety/property owner – signature and date

[Signature]
Surety/property owner – printed name

[Signature]
Surety/property owner – signature and date

[Signature]
Surety/property owner – printed name

[Signature]
Surety/property owner – signature and date

CLERK OF COURT

Date: 9/12/2014

[Signature]
Signature of Clerk or Deputy Clerk

Approved.

Holly B. Fitzsimmons, USMJ

Date: 9/12/2014

[Signature]
Judge's signature