

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Crim. No.
)	
v.)	18 U.S.C. § 875 (Interstate threats)
)	18 U.S.C. § 844(e) (Threats to use explosive)
NATHAN HANSHAW,)	18 U.S.C. § 1038 (Threats to use firearm)
Defendant)	18 U.S.C. §2 (Aiding and abetting)

INFORMATION

The United States Attorney charges:

Introduction

1. At all times relevant to the charges in this Information, NATHAN HANSHAW lived in Athol, Massachusetts.

2. From in or about September 2012 through mid-January 2013, HANSHAW participated in a practice known as “swatting,” in which he, along with others, made hoax emergency telephone calls to emergency services and falsely reported an ongoing, dangerous crime in order to elicit an armed police response (from a SWAT team, hence the term “swatting”) to a specific location, typically in order to harass someone he believed was there.

3. In his swatting calls, HANSHAW typically falsely claimed that he was a fugitive who was wanted by the F.B.I. and the U.S. Marshals, was armed with weapons, explosives, and nerve agents, and that he had taken hostages. He demanded a helicopter ride to Mexico and \$50,000 in cash. He threatened to detonate his bombs and kill his hostages if his demands were not met. He also threatened to kill any law enforcement personnel who arrived at the location. HANSHAW generally claimed to be calling from an address that, unbeknownst to the law

enforcement officers responding to the call, was the address of HANSAW's intended swatting victim.

4. HANSHAW made swatting calls to emergency services numbers across the United States and in Canada, including Denver, Colorado; Ventura, California; and Waverly, New York. In each case, armed police responses ensued.

5. In response to HANSHAW's swatting call to Ventura, California, more than 40 local and federal officers arrived at the purported crime scene, a hotel was evacuated, and nearby streets were closed for several hours.

6. To facilitate some of his swatting calls, HANSHAW made pretextual calls in order to obtain identifying information, including the physical addresses and phone numbers, of his potential swatting victims. On several occasions, in these pretextual calls, HANSHAW claimed to be a federal or state law enforcement officer seeking this identifying information for law enforcement purposes.

7. To facilitate these swatting calls, HANSHAW used techniques to disguise his location and make it appear that he was calling from the swatting victim's location. These included routing his calls through a "spoofed" cable modem that could not be traced to his residence.

COUNT ONE
(Interstate Threats)
18 U.S.C. §§ 875(c) and 2

8. The United States Attorney realleges and incorporates by reference the allegations in paragraphs 1-7 of this Information, and further charges that:

9. On or about on September 18, 2012, in the District of Massachusetts and elsewhere, defendant

NATHAN HANSHAW,

knowingly and willfully transmitted in interstate commerce a communication containing a threat to injure the person of another – specifically, he placed a hoax telephone call from Massachusetts to emergency services in or near Waverly, New York, falsely claiming that he had taken hostages and was armed with weapons, explosives, and nerve agents, and threatened to detonate his bombs and kill his hostages as well as any law enforcement personnel who arrived at the location.

All in violation of 18 U.S.C. §§ 875(c) and 2.

COUNT TWO
(Threats to Use Explosive)
18 U.S.C. §§ 844(e) and 2

10. The United States Attorney realleges and incorporates by reference the allegations in paragraphs 1-7 of this Information, and further charges that:

11. In or about early January 2013, in the District of Massachusetts and elsewhere, defendant

NATHAN HANSHAW,

through the use of the telephone and other instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to kill, injure, and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property by means of an explosive – specifically, he placed a hoax telephone call from Massachusetts to emergency services in or near Denver, Colorado, falsely claiming that he had taken hostages, was armed with explosives, and would detonate his bombs and kill his hostages and any law enforcement personnel who arrived at the location.

All in violation of 18 U.S.C. §§ 844(e) and 2.

COUNT THREE
(Threats to Use Firearms)
18 U.S.C. §§ 1038(a)(1) and 2

12. The United States Attorney realleges and incorporates by reference the allegations in paragraphs 1-7 of this Information, and further charges that:

13. On or about January 1 and January 2, 2013, in the District of Massachusetts and elsewhere, defendant

NATHAN HANSHAW,

engaged in conduct with intent to convey false and misleading information under circumstances where such information may reasonably have been believed and where such information indicated that an activity had taken, was taking, and would take place that would constitute a violation of chapter 44 of Title 18, United States Code (namely, 18 U.S.C. § 924(c)(1)(A) prohibiting use of a firearm in relation to a crime of violence for which he may be prosecuted in a court of the United States) – specifically, he placed hoax telephone calls to emergency services in or near Ventura, California, falsely claiming that he had taken hostages, was armed with explosives and firearms, and would detonate his bombs and shoot hostages and any law enforcement personnel who arrived at the location.

All in violation of 18 U.S.C. §§ 1038(a)(1) and 2.

FORFEITURE ALLEGATIONS
(18 U.S.C. § 981 and 28 U.S.C. § 2461)

14. The United States Attorney realleges and incorporates by reference the allegations in paragraphs 1-7 of this Information, and further charges that:

15. Upon conviction of one or more of the offenses alleged in Counts 1 and 2, the defendant,

NATHAN HANSHAW,

shall forfeit to the United States, pursuant to 18 U.S.C. §981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

16. If any of the property described in paragraph 15, above, as a result of any act or omission of the defendant –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

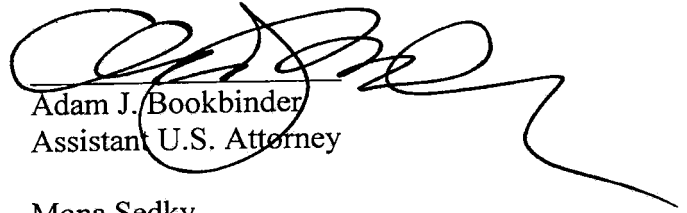
it is the intention of the United States, pursuant to 28 U.S.C. §2461(c), incorporating 21 U.S.C. §853(p), to seek forfeiture of all other property of the defendant up to the value of the property described in sub-paragraph a through e of this paragraph.

All pursuant to 18 U.S.C. § 981 and 28 U.S.C. § 2461(c).

CARMEN M. ORTIZ

United States Attorney

By:

A handwritten signature in black ink, appearing to read 'Adam J. Bookbinder', written over a horizontal line.

Adam J. Bookbinder
Assistant U.S. Attorney

Mona Sedky
U.S. DOJ Trial Attorney

Dated: August 9, 2013