

COPY

Approved: ILAN GRAFF
Assistant United States Attorney

Before: THE HONORABLE PAUL E. DAVISON
United States Magistrate Judge
Southern District of New York

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	:	<u>COMPLAINT</u>
UNITED STATES OF AMERICA	:	
	:	
- v. -	:	Violation of
	:	18 U.S.C. §§
	:	115 (a) (1) (B),
	:	875 (c)
LAWRENCE MULQUEEN,	:	
	:	
Defendant.	:	COUNTY OF OFFENSE:
	:	ROCKLAND
-----x	:	

SOUTHERN DISTRICT OF NEW YORK, ss.:

JOHN SULLIVAN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

In or about February 2013, in the Southern District of New York and elsewhere, LAWRENCE MULQUEEN, the defendant, knowingly and willfully did threaten to assault, kidnap, and murder United States officials to impede, intimidate, and interfere with those officials while they were engaged in the performance of their official duties, and to retaliate against those officials on account of their performance of official duties during their terms of service, to wit, MULQUEEN posted messages to an online social network threatening to kill members of the United States Congress.

(Title 18, United States Code, Section 115(a)(1)(B).)

COUNT TWO

In or about February 2013, in the Southern District of New York and elsewhere, LAWRENCE MULQUEEN, the defendant, knowingly did transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, MULQUEEN posted messages to an online social network threatening to kill New York state and local elected officials and others.

(Title 18, United States Code, Section 875(c).)

1. I am a Special Agent with the FBI in the New York Field Office. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers and agents, my interviews of witnesses, and my examination of documents, reports and other records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

2. I have spoken with a Lieutenant with the Clarkstown Police Department (the "CPD") ("Officer-1"), from whom I have learned the following:

a. On or about February 20, 2013, the CPD received a report from a woman ("Victim-1"). Victim-1 informed the CPD that a man who lived at a particular address in Rockland County, New York (the "Rockland Address"), had been harassing her. Victim-1 identified that man as LAWRENCE MULQUEEN, the defendant.

b. Victim-1 further informed the CPD that MULQUEEN maintained a page on Facebook under a certain pseudonym (the "Mulqueen Page"). Victim-1 noted that MULQUEEN had used the Mulqueen Page to post messages about Victim-1, including at least one message encouraging others to harass Victim-1. Victim-1 also stated that MULQUEEN was using the Mulqueen Page to post threatening statements about many individuals, including federal elected officials. Officer-1 reviewed the Mulqueen Page and identified numerous threatening statements.

3. Based on my review of Clarkstown Police Department documents, and other records, I know that LAWRENCE MULQUEEN, the defendant, lives at the Rockland Address.

4. I have reviewed the Mulqueen Page, from which I have learned the following:

a. The Mulqueen Page user indicated that he is a male, who resided in "Rockland, New York." The Mulqueen Page user posted at least one message, in which he identified Victim-1 by name and stated that he knew Victim-1. The Mulqueen Page user also had at least five "friends" (that is, self-identified affiliated Facebook users) with the last name "Mulqueen" and reported the death of a family member named "Patrick" on or about the date that I have determined a death notice was published for an individual named "Patrick Mulqueen." Based on these and other features of the Mulqueen Page, and my training and experience, I have concluded that the Mulqueen Page was used by LAWRENCE MULQUEEN, the defendant.

b. In or around February 2013, MULQUEEN posted threats to kill members of the United States Congress, as well as New York state and local elected officials, among others. These threats included the following:¹

i. On or about February 19, 2013, MULQUEEN posted: "I cannot wait to start killing the scum that is [a Governor], [a United States Senator], [a Mayor], [a United States Senator], [a United States Congressman], [a United States Congresswoman], [a United States Congresswoman], [a United States Senator], [a United States Congresswoman], [a United States Senator] and every Congressional Black Caucus member there is of these fucking racist niggers. Your time is about up scumbags. your dirt nap is coming very soon."

ii. On or about that same day, MULQUEEN posted the following comment on his earlier post: "I want these scumbags DEAD!!! That traitor scum, Obama subserviant eunichs, fuck them and death to them all." Based on my training, experience, and participation in this investigation, I believe MULQUEEN was stating that his desire to kill the above-mentioned

¹ All posts are spelled and punctuated as they appeared on the Mulqueen Page, with victims' names redacted.

federal and state elected officials was a reaction to their support for President Barack Obama's political agenda.

iii. Shortly thereafter, in response to a commenter's assertion "Ya know where I stand brutha!!," MULQUEEN posted that the commenter "better have a high powered rifle," as the commenter would "be needing it." MULQUEEN proceeded to explain: "I recommend a Binelli, a semi-automatic shotgun, it is an Italian made shotgun, very light and as I said semi-automatic, no need to pump or reload, it fires one round after another. Expensive though, but worth it, better than a Remington 870." Based on my training and experience I know that "Benelli" is the name of an Italian-manufactured shotgun and the "Remington 870" is a shotgun that is commonly used by law enforcement.

iv. Approximately eight hours later, MULQUEEN posted: "The first wave to protect against is the inner city scum, do all you can to waste these lowlifes but be mindful of your ammo. Use blades when you can to conserve bullets. Always shoot them at 100 yards or more when you can, the further away they are the least you have to worry about."

v. On or about February 20, 2013, MULQUEEN posted a video about a race-related training seminar conducted at the United States Department of Agriculture, and commented, in part, "Anyone who comes across or encounters this La Raza SPIC is commanded to KILL him and send him to hell as is where he should be sent. Don't stop there either, KILL ALL these Mexican, El Salvadoran and Guatemalan scumbags where you see them . . ." Based on my review of the linked video, I believe that MULQUEEN was using the term "La Raza SPIC" to refer to the individual who conducted the training seminar.

vi. Also on or about February 20, 2013, MULQUEEN posted, in part, "If anyone has the access to that scumbag [a political activist] and his whore wife [the activist's wife] please KILL them ASAP. I believe they reside in Chicago...find them and kill them." From my participation in this investigation, I know that the identified political activist lives in or around Chicago, Illinois.

viii. On or about February 19, 2013, MULQUEEN posted "Support your Sheriff, for he is the highest law enforcer in all the land. Your Sheriff can arrest the POTUS and

detain or kill ANY federal agent as he sees fit." Based on my training and experience, I know that "POTUS" is an acronym for "President of the United States."

WHEREFORE, deponent respectfully requests that a warrant issue for the arrest of LAWRENCE MULQUEEN, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.



JOHN SULLIVAN
Special Agent
Federal Bureau of Investigation

Sworn to before me this
25th day of February, 2013


THE HONORABLE PAUL E. DAVISON
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK