

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST**

I, Corrinne Nemis, being duly sworn state:

**Introduction and Agent Background**

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since 2024. I completed the FBI’s law enforcement Training Academy in Quantico, Virginia. I am currently assigned to the Boston Field Division where I am a member of the Homeland Security Task (“HSTF”). As a Special Agent, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request an arrest warrant.

2. My investigations have included the use of the following investigative techniques: physical surveillance; handling of cooperating sources and witnesses; execution of search and seizure warrants; wire and electronic interception of communications; and the execution of arrest warrants. Based on my training, experience, and information provided to me by other law enforcement officers, I am familiar with the techniques used by individuals engaged in the commission of various criminal offenses.

3. I am currently investigating Bethany Abigail Terrill (“TERRILL”) for threatening to assault or murder a federal law enforcement officer with intent to impede, intimidate, or interfere with such law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such law enforcement officer on account of the performance of official duties, in violation of Title 18 U.S.C. § 115(a)(1)(B) (the “Target Offense”).

4. This affidavit is being submitted in support of a criminal complaint charging

TERRILL with the Target Offense.

5. The facts set forth in this affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; my review of documents, video, and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience and the training and experience of other agents. This affidavit is being submitted for the limited purpose of establishing probable cause to believe that TERRILL committed the Target Offense. Therefore, I have not included all facts known to me concerning this investigation.

#### **STATEMENT OF PROBABLE CAUSE**

6. On September 29, 2025, Special Agents (“SA”) from Homeland Security Investigations (“HSI”), Immigration and Customs Enforcement (“ICE”), and the Federal Bureau of Investigation (“FBI”), collectively “the Agents”, who were working collaboratively as part of a multi-agency effort to support ICE Enforcement and Removal Operations (“ERO”) in effecting the arrest of Person 1<sup>1</sup> in the vicinity of the Malden District Court located at 4040 Mystic Valley Parkway, Medford, MA 02155. Person 1 was the subject of an administrative immigration enforcement arrest. During this operation, the Agents encountered a previously unknown individual, who was present outside of the Malden District Court for reasons unrelated to the Agents’ activities. This individual, subsequently identified as TERRILL, observed Agents effecting the arrest of Person 1 and physically interjected herself into the middle of Agents while they were effecting the arrest of Person 1. TERRILL continued to be verbally abusive, to physically interfere with the arrest, and ultimately made threatening statements to kill the federal

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<sup>1</sup> The identity of Person 1 is known to law enforcement.

officers on scene.

7. The Agents on scene were outfitted with their respective law enforcement agencies' identifiers, which included badges, body armor vests with agency placards, or other outer garments that clearly displayed the name of the agency with which the Agent was employed. The three FBI SAs who were present were also equipped with active body worn cameras ("BWC"), which recorded the interaction between the Agents and TERRILL. I have spoken with the Agents and reviewed all BWC footage of the FBI SAs on scene.

8. At approximately 11:32 am, the Agents observed Person 1 exit the Malden District Court in Medford, Massachusetts, following his arraignment on one count of leaving the scene of property damage. Certain of the agents approached Person 1, informed him that he was the subject of an immigration arrest, and placed him into custody without any difficulty or resistance. As the Agents approached Person 1 and placed him in handcuffs, TERRILL, a bystander walking towards the entrance of the courthouse, approached the Agents, screaming at and pushing through the Agents to capture a video recording on her mobile telephone. TERRILL began screaming "ICE is here, ICE is here", "you guys are monsters, this is insane", "sir what's your name, what's your name", "I can try to help you", and "I am an American civilian I have a right to be here" as she continuously pushed into Agents all while filming them. During this entire time the Agents, who were clearly identifiable by their badges, agency placards, and clothing, told TERRILL to "back up" several times. TERRILL repeatedly attempted to push past the Agents and failed to comply with any commands. Agents notified TERRILL that she could be arrested if she continued to fail to comply with their requests to "back up" and give them space to continue to safely complete their arrest. Agents were actively securing the handcuffs on Person 1 and searching him while TERRILL continued to intercede.

9. TERRILL was belligerent and became increasingly aggressive throughout the entirety of the interaction. TERRILL proceeded to yell profanity at the Agents, addressing them as “Nazis” and “disgusting” several times. While agents were leading Person 1 to the car, TERRILL yelled, “Charlie Kirk<sup>2</sup> died, and we love it... we’re coming for you, gonna kill you.” One FBI Agent, who was initially walking in the opposite direction of TERRILL, heard the threat, turned around, and approached TERRILL to detain her, to ensure that she did not have a weapon or other means to immediately carry out the threat. As the FBI Agent attempted to detain her, TERRILL was actively resistant and fought to escape, requiring three additional Agents to assist in placing TERRILL in restraints. At one point, TERRILL, who was wearing long acrylic fingernails, hooked her finger on one cuff to prevent the Agents from latching the second cuff onto her wrist. The Agents repeatedly told TERRILL to undo her finger, and TERRILL remained resistant and non-compliant and continued screaming.

10. Once the Agents were able to handcuff TERRILL, they stood her up, attempted to calm her down, and informed her that they were seizing her phone, which they believed had evidence of her threat. TERRILL repeatedly denied she made any threatening statements and told the Agents to play the video from her phone so that it would not be detained. The Agents replayed the video for TERRILL and confirmed that it clearly captured TERRILL threatening to kill the Agents. At this point, TERRILL admitted to part of her prior threatening statement by reiterating, “We are coming for you. We don’t like Nazis in America.”

### **CONCLUSION**

11. Based on the foregoing, I respectfully submit there is probable cause to believe that

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<sup>2</sup> On September 10, 2025, nineteen days prior to this incident, political activist Charlie Kirk was assassinated at a public speaking event in Utah. The killing garnered significant media attention.

25-mj-8524-PGL

on or about September 29, 2025, TERRILL did threaten to assault or murder a federal law enforcement officer with intent to impede, intimidate, or interfere with such law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such law enforcement officer on account of the performance of official duties, in violation of Title 18 U.S.C. § 115(a)(1)(B).

Sworn to under the pains and penalties of perjury,

Corrinne Nemis /by Paul G. Levenson  
Corrinne Nemis  
Special Agent  
Federal Bureau of Investigation

Attested to by the applicant in accordance with  
the requirements of Fed. R. Crim. P. 4.1 by

  
HON. PAUL G. LEVENSON  
United States Magistrate Judge

on October 9, 2025.

