AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Andrew Allaire, being duly sworn under oath and deposed, state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the FBI and have been so employed since May 2017. I am currently assigned to the Portland, Maine Resident Agency in the Boston Field Office. I have primarily investigated violations of federal law, including but not limited to, carjackings, robberies of banks, robberies of businesses that affect interstate commerce (also known as Hobbs Act robberies), kidnappings and crimes against children. Furthermore, I have received training and experience as a police officer in the City of Biddeford, State of Maine, for approximately six years prior to my current position as a Special Agent.

2. I have participated in numerous violent-crime investigations and have debriefed or participated in debriefings of numerous defendants, informants, and witnesses who had personal knowledge regarding crimes of violence.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested warrant.

4. Based on the facts set forth in this affidavit, there is probable cause to believe that ALICE V. JONES, has violated Title 18, United States Code, Section 875(c) and Title 47, Section 223(a)(1)(C).

PROBABLE CAUSE

5. On May 12, 2025, a member of the Wells Police Department ("Wells PD") contacted the FBI in Portland, Maine concerning threatening communications being made toward their officers. It was reported that a call was received on May 11, 2025, at 2:03 AM by a

Wells PD Official on her cell phone. The call was made from telephone number (508) 377-6705 (hereinafter, "SUBJECT TELEPHONE"). The unknown caller, a female, called the Official a "nazi."

6. About five minutes after to the call to the Wells PD Official, the Wells Dispatch Center received a telephone call from the SUBJECT TELEPHONE. This call to the dispatcher is summarized as follows:

a. The female caller called the dispatcher a "fucking nazi" and ridiculed Wells Police for being the first in the State of Maine to work alongside Immigration and Customs Enforcement;

b. The caller stated to the dispatcher, "let me know if you want to get slit all the way through your throat, bitch, cause you're a fucking nazi."

c. The caller referenced the level of armor ICE agents wear, threatened that there are going to be dead ICE agents, and referred to the Wells PD Official as a "[d]ead nazi cunt walking."

d. The caller stated that she just got her first gun, has received extensive training, and that this is what the Second Amendment is for.

e. The caller took credit for doxing police officers in Worcester and Nashville, stating that they would do the same to Wells PD.

7. On May 11, 2025, at about 2:15 AM, the same female called the dispatch center again from the SUBJECT TELEPHONE and threatened to go sit outside of the Wells Police Station and follow the dispatcher home from her shift. The caller claimed to be a member of Antifa New England.[1] The dispatcher received another call on May 11, 2025 at approximately

[1] I understand "Antifa" to refer to a loose collection of persons and groups who claim to oppose fascism.

2:17 AM, in which the female caller stated, "If you nazi cunts do anything here like what happened in Worcester, you are going to have some dead ICE agents."

8. On May 11, 2025 at approximately 2:20 AM, a Wells PD Officer ("Officer 1") received a call from the SUBJECT TELEPHONE on her personal cell phone. The female caller recited Officer 1's home address where Officer 1's child was then home. Officer 1 feared for her child's safety and contacted local police there to check her residence.

9. On May 11, 2025, at approximately 2:30 AM the mother of a Wells PD Sergeant ("Sergeant 1") received a call from the SUBJECT TELEPHONE on her home phone number. The female caller stated that that Sergeant 1's mother would end up dead if she was supporting ICE. The caller called Sergeant 1's mother a nazi, at which point Sergeant 1's mother ended the call and blocked the number.

10. On May 11, 2025, at approximately 1:40 a.m. Central Daylight Time, the mother ("Victim 1") of another Wells PD Sergeant who lives outside the District of Maine received a call from the SUBJECT TELEPHONE. The female caller stated, "You are a fucking nazi. You will die because you are a fucking nazi." Victim 1 ended the call and continued to receive six more calls in succession from the SUBJECT TELEPHONE. The threatening calls were reported to local police.

11. On May 11, 2025, at approximately 6:16 PM, Wells PD Dispatch received a call from the SUBJECT TELEPHONE in which the female caller demanded to know what was going on with Wells Officers being deputized as ICE agents. The call was forwarded to a Wells PD Corporal ("Corporal") who continued the call from a desk phone. The female caller recited a list of all of the Wells Police Officers. She claimed to know what level of protection their vests were rated for. The female repeatedly called the Corporal a nazi and stated that all nazi's are going to

be murdered. The Corporal asked the female if she was done, and she stated that she will be done when President Trump is dead. She stated that she has wanted him dead since the early 2000s. The Corporal asked whether caller wanted President Trump dead, and she replied, "I want to slit his throat, I want to be the one to do it." The caller stated that she and Antifa militias are real and that she is a researcher for the militia, not a field worker. During the call, the female caller referenced a police interaction she had last Thanksgiving involving revenge porn where the Portland Police did not help her.

12. On May 13, 2025, I researched the SUBJECT TELEPHONE in FBI systems and identified a connection to an FBI Jacksonville case opened on May 10, 2025. FBI records indicate that on May 10, 2025, a Supervisory Border Patrol Agent ("Victim 2") began receiving threatening and harassing calls from the SUBJECT TELEPHONE. Victim 2 believed the calls were prompted by a video posted on the internet which showed his participation in a May 2025 traffic stop in Florida.

13. Victim 2 received a call from the SUBJECT TELEPHONE on May 10 at approximately 6:20 PM. At the time of the call, Victim 2 was not in Maine. During this call, which was not recorded, a female caller told Victim 2 that he was the reason the second amendment existed and that she was coming for him. The caller called two additional times and Victim 2 recorded these additional calls. In the recorded calls, the female caller referred to Victim 2 as a nazi. She told him that Americans murder nazis. She stated, "If you keep fucking with citizens you're going to die. This is what the Second Amendment is for." Victim 2 asked the female for her name and the female caller challenged him to figure it out. The female caller recited Victim 2's name and date of birth. The female caller's statements caused Victim 2 to fear for his and his family's safety.

14. A complaint was made to the FBI in Jacksonville regarding the threatening communications to Victim 2. FBI Jacksonville identified the SUBJECT TELEPHONE as a Pinger/TextFree number. An emergency disclosure request (EDR) was sent to Pinger. The response from Pinger identified two recent IP addresses used by the number an Apple ID, Apple push token, and an advertising ID. Pinger records showed that the account associated with the SUBJECT TELEPHONE was created on May 9, 2025 at 11:11 PM (UTC). Pinger provided two last known IP address associated with the account. IP address 67.244.32.113 was last captured on 05/11/25 at 2:39 AM UTC and IP address 174.196.202.162 on 05/10/25 at 10:18 PM UTC.

15. FBI Jacksonville issued an EDR to Apple, Inc., for subscriber information associated with the Apple ID, push token, and advertising ID that Pinger had provided with respect to the SUBJECT TELEPHONE. Apple responded and identified the subscriber as ALICE JONES of 1909 Washington Avenue, Portland, Maine. Associated email addresses, forms of payment, registered devices were all in the name of ALICE JONES and address of 1909 Washington Avenue.

16. FBI Jacksonville submitted an EDR to Charter Communications with one of the IP addresses utilized by the SUBJECT TELEPHONE. Charter identified the subscriber as Carolyn Ramm of 1909 Washington Avenue, Portland, ME. Based on open-source checks, Ramm also resides at 1909 Washington Avenue. In addition, Cumberland County records indicate that both Carolyn Ramm and Alice Jones are listed on the deed to 1909 Washington Ave, Portland, Maine.

17. On May 13, 2025, I learned that the Worcester, Massachusetts police department contacted the Portland, Maine police department requesting information on JONES. Police Officers in Worcester had also reported receiving threatening calls believed to originate from

JONES. I further learned that Worcester Police contacted Pinger and were provided with recent IP Addresses associated with the SUBJECT TELEPHONE, which included 67.244.32.113, 174.196.195.97.

18. Maine Bureau of Motor Vehicles records indicate that ALICE JONES has a valid Maine driver's license with an address listed of 1909 Washington Avenue, Portland, ME 04103. She has one active vehicle registration, also with 1909 Washington Avenue as the listed address.

Similar Conduct to Current Activities

19. In February 2025, a Texas Fusion Center observed a post on X in which the user of X account @Jenen6616071188 was posting threats including threats to kill Elon Musk. A series of court orders were served in an attempt to identify the user of the account. Subsequently, I learned that agents believed that Alice Jones may be the user of the X account, and I was asked to visit Jones' residence at the SUBJECT PREMISES.

20. On April 2, 2025, I went to the SUBJECT PREMISES to attempt to speak to JONES. Upon arriving at her residence, there were no vehicles in the driveway and a large spray painting reading, "BOMB BOOMERS" was displayed at the entrance to the driveway. Painted onto the window was a Ukraine flag with a math equation over the flag. The equation began with "Elon=…" I knocked on the front door for several minutes and heard at least one dog barking just inside the front door, but never got an answer. In the following weeks, I made several telephone calls and a second in person visit to the residence, but never got an answer or call back from JONES.

Search Warrant at 1909 Washington Avenue

21. On May 14, 2025, a federal search warrant was obtained in the District of Maine authorizing a search of the residence at 1909 Washington Avenue, Portland, Maine. On May 15,

2025, at approximately 7:00AM, members of the FBI – Portland resident agency, executed the search warrant. After attempts to alert any occupants of 1909 Washington Avenue with police sirens and announcements on a loudspeaker failed, Agents approached the front door and continued to knock and announce the FBI presence and that we had a search warrant. Still, no one answered the door and the front door was breached.

22. A female approached the door and was identified by Agents as ALICE V. JONES. JONES was verbally confrontational and screamed at Agents. When asked if anyone else was present in the house, she stated it was "only you nazis." JONES refused to follow simple instructions. JONES was secured in handcuffs, provided shoes, and escorted to an FBI vehicle while Agents secured the residence.

23. JONES continued to be verbally confrontational while in the FBI vehicle. JONES asked if she was being arrested or if the reason the FBI was present was because of her "shit talking." FBI agents indicated JONES was being detained for the safety of the officers and attempted to exit the vehicle, swinging her legs out of the vehicle as if to stand up. An FBI agent told her to put her legs back into the vehicle. She failed to comply. An FBI Task Force Officer (TFO) pulled her back into the car from the other side to which JONES began kicking the inside of the vehicle door. JONES was warned that assaulting a federal officer was a crime. JONES called FBI agents and TFOs "Gestapo" and stated we were "kidnapping" her. JONES stared at many of the FBI agents, stated that she was memorizing their faces, and asked on several occasions for their badge numbers.

24. During the search, Agents located an unloaded Ruger .380 caliber handgun and about 100 rounds of .380 ammunition in a hallway closet, next to bedroom. Several electronic devices were seized to be forensically analyzed. In a cursory review of a digital tablet found in

the residence, agents observed communications which appeared similar to some of the threatening and harassing communications made by Defendant. For instance, there were text messages were sent on 02/06/2025, to four different cell phone numbers stating, "REAL AMERICANS MURDER NAZIS."

25. During the above referenced interactions with the Defendant, I had the opportunity to hear her voice. I have also had the opportunity to listen to recordings of threatening telephone communications from the Defendant to Victim 2, Worcester, Massachusetts police personnel, and Wells PD personnel. I recognized Defendant's voice in these recordings, and in my opinion, Defendant is the speaker who made the threatening communications. Further, the language used by Defendant during the execution of the search warrant is similar to the language used by Defendant in the threatening calls. For instance, Defendant made frequent references to nazis in the threatening calls and during the execution of the search warrant.

Andrew Allaire, Special Agent
Federal Bureau of Investigation

Sworn to telephonically and signed electronically in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedures

Date: May 15 2025

Judge's signature

City and state: Portland, Maine

Karen Frink Wolf, U.S. Magistrate Judge
Printed name and title