

UNITED STATES DISTRICT COURT

DISTRICT OF MAINE  
PORTLAND, MAINE

UNITED STATES OF AMERICA

RECEIVED AND FILED

v.

2016 } AUG - 3 Mag. No. 2:16-162-JHR  
}

ESPEN BRUNGODT

DEPUTY CLERK

CRIMINAL COMPLAINT

I, Patrick M. Clancy, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**COUNT ONE**

On or about August 3, 2016, in the District of Maine, the defendant,

**ESPEN BRUNGODT**


knowingly and willfully did transmit in interstate and foreign commerce, through the use of the internet, the following threatening e-mail communication to Deputy Chief Vernon Malloch and members of the Portland Police Department:

Time for more police to die.  
We are getting our Sig Sauer MCX .223-caliber rifles ready, and very soon, my partners will head down to Portland Police Department on 109 Middle St. There they will shoot and kill as many police officers as they can. Meanwhile, I will get into position at the top of Cumberland County Parking Garage on 188 Newbury St. I have booby trapped the garage with explosives, so don't go there. Time to take action. More dead cops.

In violation of Section 875(c) of Title 18 of the United States Code.

  
Special Agent Patrick M. Clancy  
U.S. Federal Bureau of Investigation

Sworn to before me and subscribed in my presence this 3<sup>rd</sup> day of August, 2016.

  
John H. Rich III  
United States Magistrate Judge

**AFFIDAVIT OF PATRICK M. CLANCY**

I, Patrick M. Clancy, having been duly sworn, state as follows:

1. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since 2004. I am currently assigned to the Portland, Maine office of the FBI.

2. I submit this Affidavit in support of a criminal complaint charging Espen Brungodt with transmitting in interstate commerce a threatening communication, in violation of 18 U.S.C. § 875.

3. I make this Affidavit based on my personal investigation, my training and experience, and my review of relevant documents and conversations that I have had with other law enforcement officers and agents involved in this investigation.

**RESULTS OF INVESTIGATION**

4. On August 3, 2016, Portland Police Deputy Chief Vernon Malloch received the following e-mail correspondence from an individual using the e-mail address 'espenbrungodt@gmail.com':

Time for more police to die.  
We are getting our Sig Sauer MCX .223-caliber rifles ready, and very soon, my partners will head down to Portland Police Department on 109 Middle St. There they will shoot and kill as many police officers as they can. Meanwhile, I will get into position at the top of Cumberland County Parking Garage on 188 Newbury St.  
I have booby trapped the garage with explosives, so don't go there.  
Time to take action. More dead cops.

Also on August 3, 2016, the Portland Police Department's Facebook page received a private message containing identical language. The message was sent from a Facebook page belonging to 'Espen Brungodt.'

5. On August 3, 2016, Facebook and Google provided information to law enforcement concerning the accounts belonging to Espen Brungodt. Google provided an Internet Protocol Address (“IP address”) associated with the e-mail address [espenbrungodt@gmail.com](mailto:espenbrungodt@gmail.com). Facebook also provided the same IP address for the location where the Facebook page of Espen Brungodt was accessed on August 3, 2016. Law enforcement determined that this particular IP address was controlled by Time Warner Cable.

6. On August 3, 2016, Time Warner Cable provided information to law enforcement and confirmed that the IP address referenced above was associated with the Residence Inn, located at 145 Fore Street in Portland, Maine.

7. On August 3, 2016, an FBI analyst reviewed FBI databases and determined that an ‘Espen Brungodt’ entered the United States on July 26, 2016 at the Boston, MA port of entry. A Department of Homeland Security special agent was able to further confirm that Espen Brungodt was a citizen of Norway and that he was travelling with Arvid Andersen and Linn Therese Brungodt.

8. I reviewed the guest ledger at the above-referenced Residence Inn and learned that Room 215 had been rented by Linn Therese Brungodt and that the room was occupied by three people. The check-in date was listed as August 2, 2016 while the check-out date was August 4, 2016.

9. FBI and Portland Police established surveillance in and around the hotel. Surveillance personal observed three people leave Room 215. One of the three appeared to be the same individual depicted in both the Facebook profile of Espen Brundogt as well as the photograph Homeland Security took of Espen Brungodt as he entered the country on July 26, 2016.

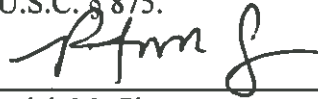
10. Law enforcement confronted Brungodt in the lobby of the Residence Inn and placed him in handcuffs. Brungodt was immediately asked about whether there were any immediate threats, to which Brungodt responded "No, it had the desired effect."

11. Brungodt was transported to the Portland Police Department and interviewed. Following an advisement and waiver of his Miranda rights, Brungodt admitted to both e-mailing the threatening communication using his gmail account as well as to posting the threat using his Facebook account. He also claimed to have posted the threatening language on a 'Twitter' account that he created for that purpose. He also confirmed that he used his personal laptop computer to communicate all threats.

12. Based on my training and experience I am aware that both Google and Facebook are accessed via the internet. Google is an internet service provider headquartered in Mountain View, California. Google provides a variety of on-line services, including e-mail access, to the public. Google allows subscribers to obtain e-mail accounts at the domain name gmail.com, like espenbrungodt@gmail.com. All e-mails transmitted using Google's e-mail service are processed on Google's servers. Based on my training and experience I aware that an e-mail sent from Maine to a recipient in Maine using Google's e-mail service is processed on Google servers located outside of Maine.

**CONCLUSION**

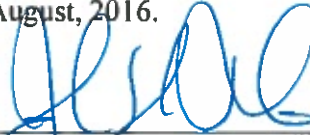
13. Based on the foregoing facts, I respectfully submit that probable cause exists to believe that on August 3, 2016, Espen Brungodt, transmitted in interstate commerce a threatening communication, in violation of 18 U.S.C. § 875.



---

Patrick M. Clancy  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this 3<sup>rd</sup> day of August, 2016.



---

John M. Rich III  
United States Magistrate Judge