

**AFFIDAVIT OF SPECIAL AGENT LAURA MACRORIE  
IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Special Agent Laura Macrorie, being duly sworn, hereby state the following:

1. I am currently employed as a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since March 2020. I have received twenty-one weeks of formal training in investigative techniques at the FBI Academy in Quantico, Virginia. I also have received training from the FBI Cyber Division in basic networking, mobile communications, analysis of digital records, social media, cloud communications, email tracing, and other cyber investigative skills.

2. As part of my duties, I am authorized to investigate violations of the laws of the United States, including criminal violations relating to computer-system intrusions, internet fraud, and cyberstalking. I make this affidavit in support of a criminal complaint and arrest warrant charging BRAD CERULLO (“CERULLO”) (DOB XX/XX/1979), of Londonderry, New Hampshire, with cyberstalking, in violation of 18 U.S.C. § 2261A(2) (the “Target Offense”).

3. The statements contained in this affidavit are based in part on information provided and written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of subpoenas and other records; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training, and background as a Special Agent with the FBI.

**STATEMENT OF PROBABLE CAUSE**

4. From in or about May of 2020 through June 9, 2021, CERULLO engaged in an extensive cyberstalking campaign targeting Victim 1, the effects of which are still impacting

Victim 1 today. [REDACTED]

[REDACTED].

5. Through an analysis of records from X Corp., Meta Platforms Inc., Google, AT&T, Microsoft, Apple, and others, agents were able to determine that the accounts used to commit the offense were linked, among other things, by overlapping subscriber information (email, phone number, IP address, or a combination of these), which tied these accounts to each other and to CERULLO's personal accounts.

6. CERULLO used a variety of techniques and methods to harass and intimidate Victim 1, including posting private sexualized content, exposing her personal information, and creating vulgar fake accounts in her identity. CERULLO's course of conduct included, but was not limited to, the following:

a. obtaining and then widely distributing over 340 of Victim's images, including sexually explicit images and videos apparently stolen from a secure device in Victim 1's possession;

b. posing as Victim 1 by creating impersonation accounts in her identity and then posting or sending various harmful content from those accounts, including "confessions" purporting to be scandalous private details about Victim 1's sex life, solicitations of fantasy sexual encounters on her behalf, and outreach to men with whom Victim 1 was connected on her true social media accounts;

c. publicizing in the impersonation accounts Victim 1's true home address, mobile phone number, email address, LinkedIn account, where she attended high school and college, and place of employment;

d. encouraging others on the internet to contact Victim 1, save and repost her content, and “hunt” for her on Pornhub; and

e. [REDACTED]  
[REDACTED]

### **The Impersonation Accounts**

7. In March 2021, Victim 1 became aware of a Twitter account with username @[Victim first name][Victim last initial]\_05, which had been impersonating her for approximately one year, since about May of 2020. The account mimicked the way Victim 1 spoke and shared certain details about her life that only people who knew Victim 1 would know. The account posted photos of Victim 1, some of which were sexually explicit. According to Victim 1, many of these images were derived from private videos located on a secure hard drive that she had never posted online nor consented for anyone to share. The account also posted sexually provocative statements, including a post on September 22, 2020, that indicated she wanted to be sexually assaulted. The account further directed other Twitter users to masturbate and ejaculate on photos of Victim 1 and send the photos back to the account (conduct that is known on the internet as a “cum tribute” or “tribute”). The account encouraged other users to save and repost the content, stating she identified herself as a “cumslut” and wanted to be “exposed” by other men on the internet. After Victim 1 started reporting the account to Twitter, CERULLO, who was operating the account, blocked Victim 1 and added her true email and phone number for Twitter users to contact her directly.

8. CERULLO also created two additional Twitter accounts, one of which displayed Victim 1’s true personal information that included her home address, phone number, email address, LinkedIn account, where she attended high school and college, and where she was

employed, all viewable to the public. In one public post made by this account, CERULLO posted: “My other account @[Victim first name][Victim last initial]\_05 was reported and shut down. I managed to upload some of your favorites. Don’t know how much longer I want to do this. #cumslut #exposeme #cumtribute”. The name of the second of these additional Twitter accounts mirrored a moniker associated with a true account belonging to Victim 1 and posted or re-posted voyeuristic content from other users. This account posted a link to a Facebook account which was created and used by CERULLO to impersonate Victim 1, including reaching out to men she knew in real life, connecting with them to show them the sexualized content of Victim 1 posted on Twitter.

9. Between March of 2021 and May of 2025 Victim 1 received approximately 72 text messages to her cell phone from at least 27 senders who were unknown to her, many from VoIP numbers. Several referenced her photos or personal information on the fraudulent Twitter accounts, and a few sent Victim 1 sexually explicit photos of herself that had been posted on these fraudulent accounts. Two of the VoIP numbers involved in sending these messages belonged to CERULLO.

10. From one of these VoIP numbers, CERULLO anonymously sent Victim 1 three photos: one showed a photo of Victim 1 being displayed on a digital device with male genitals hovered over the photo, another depicted a semen-covered photo of Victim 1’s face, and the third depicted a semen-covered, nude photo of Victim 1. When Victim 1 told the sender to stop messaging her, the sender responded, “I thought you liked cumtributes on your tits. That’s what you told me on Twitter.” After Victim 1 notified the sender the Twitter account was fraudulent, the sender replied, “Oh well. You still look hot with a dick sliding into your wet pussy. Even if the person posting wasn’t you, I still came all over your naked pictures. I’d love to lick every

inch of your body.” The sender went on to tell Victim 1, “I saved most of the pictures and videos. I’ll just jerk off to them later. Maybe I’ll share them on my own Twitter and Facebook accounts.”

11. In June of 2021, a few months after discovering the impersonation Twitter and Facebook accounts, Victim 1 received a package at her home address shortly after her birthday that contained a card with the message “Eat a bag of dicks” and contained penis-shaped candies labeled “Bag of dicks”.

12. In total, CERULLO used over 340 images of Victim 1, including sexually explicit images and videos she believed were stolen from a secure device in her possession, and created at least ten accounts, including four accounts containing Victim 1’s name, to impersonate, degrade, and defame Victim 1 with the intent to harass and intimidate Victim 1, and in doing so, both caused and attempted to cause Victim 1 substantial emotional distress.

#### **Evidence Located in Cerullo’s Accounts**

13. A review of a Google account created by CERULLO under an alias revealed the account contained hundreds of images of Victim 1 and indicated he shared these images with at least five other individuals.

14. A review of CERULLO’s iCloud account revealed over 500 images of Victim 1, including non-explicit photos, sexually explicit photos, and two sexually explicit videos that were posted to the impersonation accounts. Over 90 of these images, the majority being sexually explicit, were associated with an encrypted photo vault application installed on CERULLO’s phone, disguised as a calculator.

15. Some of these sexually explicit photos of Victim 1, which were located in CERULLO’s iCloud account, appeared to have captions added to them. These additional

captions were depicted as thought bubbles on sexually explicit photos of Victim 1 and included statements like “Happy Steak and BJ Day” and “MMM. I WISH THIS WAS BRAD’S COCK SLIDING INSIDE OF ME. IT WOULD FEEL SO MUCH BETTER!”

16. In addition, CERULLO boasted to a friend in text messages, backed up to his iCloud account, that while he sat across from Victim 1 [REDACTED], CERULLO would look at nude images of Victim 1 without her knowing. A review of one of the Google accounts created by CERULLO under an alias revealed screenshots showing a digital card game with a background displaying the Victim’s nude and sexually explicit images that were uncovered as the number of cards in the game decreased.

17. CERULLO’s iCloud account also contained two Word documents, which, based on the documents’ metadata, were apparently written by CERULLO. These documents appeared to be identical, and both included a title page with the title “Blackmailing [REDACTED] an erotic short by Alan Lucard”. In the pages that followed, the narrator describes placing a hidden camera in [REDACTED]’s bedroom [REDACTED]  
[REDACTED]  
[REDACTED]. CERULLO changed all of the names with the exception of the featured [REDACTED], whose name was the same as Victim 1’s. The narrator described watching this [REDACTED] in various states of undress and engaging in sexual activity via the secret camera in detail, until he used this footage to blackmail her into having sex with him.

18. As in the “erotic short”, [REDACTED]  
[REDACTED]. Backup files associated with CERULLO’s iCloud account contained numerous voyeuristic photos of Victim 1 and other individuals. For example, some photos depicted Victim

1 sleeping. Other photos captured all [REDACTED] and had file names such as “[REDACTED] crack” and “sneak01”. Additional voyeuristic images of Victim 1 found in CERULLO’s iCloud backup files [REDACTED]. It appeared that some of these images had been used or manipulated to create additional images, which were also present in CERULLO’s iCloud account. This included a collage of women’s breasts, which included Victim 1’s breasts [REDACTED] and digitally altered images that depicted Victim 1 nude with an adult nude male next to her.

### **Effects on Victim 1**

19. As a result of CERULLO’s course of conduct, Victim 1 suffered substantial emotional distress. Because of the targeted harassment from CERULLO and others who had seen and responded to the impersonation accounts created by CERULLO, Victim 1 stopped sharing her home address, even with family members, and continues to pay for a mailing address not associated with her residential address. Because her place of employment was widely publicized by the impersonation accounts, Victim 1 regularly changed her parking routine at work. Because both her home and work addresses have been publicized along with her true likeness, Victim 1 purposefully maintains an unpredictable schedule to avoid in-person confrontations with any of the men who might recognize her or who have reached out to her online. Victim 1 has changed her privacy settings on any online accounts she maintains in her true name. In response to the disclosure of humiliating and reputationally damaging information to her employer and the public in general, she has suffered from paranoia and self-blame. Additionally, given that her reports to law enforcement did not initially result in the identification of the perpetrator, Victim 1 hired an attorney, digital forensics examiner, and fingerprint analyst

at her own expense. In summary, Victim 1 has reported that she feels like she has been living in an “unseen jail”.

**CONCLUSION**

20. Based on all of the foregoing, I submit that there is probable cause to believe that from in or about March 2020 through in or about June 2021, in the District of Massachusetts and elsewhere, BRAD CERULLO, with the intent to harass and intimidate Victim 1, used an interactive computer service, electronic communications service, and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1, all in violation of Title 18, United States Code, Section 2261A(2).

Sworn to under the pains and penalties of perjury.

Laura Macrorie /by Paul G. Levenson  
LAURA MACRORIE  
Special Agent, Federal Bureau of Investigation

Sworn to via electronic means in accordance with Fed. R. Crim. P. 4.1 on March 24, 2026.

  
HON. PAUL G. LEVENSON  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MASSACHUSETTS

