AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America
v.
WILLIAM UPHAM

Case No. 3:26-mj-1296-SuH

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 13-15, 2026 in the county of Duval in the Middle District of Florida, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 871	Threats against the President

This criminal complaint is based on these facts:

See Affidavit.

☑ Continued on the attached sheet.

Complainant's signature

John Rolander, Special Agent, USSS
Printed name and title

Sworn to before me over the telephone or other reliable electronic means and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: July 15, 2026

Judge's signature

City and state: Jacksonville, Florida

Samuel J. Horovitz, United States Magistrate Judge
Printed name and title

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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, John Rolander, being first duly sworn, hereby depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the United States Secret Service (USSS) and have been so employed since August 2004. My assigned duties include the investigation of federal criminal offenses, including threats directed towards current and former protectees of the USSS. This includes threatening communications in violation of 18 U.S.C. § 875, threats against the President and successors of the Presidency in violation of 18 U.S.C. § 871, as well as threats against former Presidents and certain other persons protected by the USSS covered by 18 U.S.C. § 879, and related crimes.

2. I have been trained in obtaining probable cause, surveillance techniques, the interviewing of subjects and witnesses, and the planning and execution of arrest, search, and seizure warrants. I have also received training on criminal violations at various conferences and venues.

3. I submit this affidavit in support of a criminal complaint charging WILLIAM UPHAM ("UPHAM"), a U.S. citizen who resides in Jacksonville, Florida, with transmitting a threat to kill the President of the United States in violation of 18 U.S.C. § 871.

4. The statements contained in this affidavit are based on my personal knowledge and experience, and reliable information from other law enforcement

officers and computer databases. Because of the limited purpose of this affidavit, I have not included each and every fact known to me. Rather, I have included only those facts necessary to establish probable cause supporting the requested complaint.

PROBABLE CAUSE

5. On or about July 14, 2026, the USSS received two calls concerning potential threats made by Marine Corps veteran William Lintag UPHAM. The first caller, who wished to remain anonymous, told the USSS someone was making strange statements on their Instagram handle "uphamforcongress."

6. The second call was from a representative at United States Department of Veterans Affairs ("VA"). The VA rep provided the following information regarding a tip from a third party. "Veteran William Lintag UPHAM was medically retired from the USMC [United States Marine Corps] due to mental health-related concerns. The caller reported the veteran quit his job as a state prosecutor abruptly, took a loan out to run for office, has recently had a psychiatric hold, and is now posting videos on Instagram wearing his USMC uniform and making statements regarding the Trump administration, referring to POTUS as the antichrist, and stating he will overthrow the Trump administration in the name of God. UPHAM provided information on weapons to be used, including piercing body armor ammunition. UPHAM stated in the USMC they kill the enemy using two shots to the chest and one to the head. UPHAM referred to that as the fastest and most efficient way to kill the enemy and save ammunition. He then went on to discuss body rushing, giving instructions regarding 'slice the pie' and attacking POTUS in pairs of two."

7. On July 14, 2026, USSS open-source searches located the originally reported videos and UPHAM's Facebook account. On July 13, 2026, at 2026 hours EDT, the user, who I observed to be UPHAM, posted a video in which he was wearing military fatigues and stated the following:

> Revelation Chapter 19 Verse 11 states that the heavenly warrior will defeat President Trump and president Trump will be sent to hell with the beast. The heavenly warrior will be dressed in a robe dipped in blood and his name is the word of God. The armies of heaven will follow him. God's children do not be afraid. Obey God and follow his orders. God will help you. **This is a call to arms. To all of God's children, you must overthrow the Trump Administration on behalf of God. I'd like to turn to combat tactics and provide military instruction on how to overthrow President Trump and his forces**. **For equipment, I recommend using a semi-automatic rifle such as an AR-15. 5.56 rounds are very effective at piercing body armor. You should use a scope, high-capacity magazines, a load bearing vest to carry these magazines as well as canteens.** In the United States Marine Corps, **we kill the enemy using box drills. What does that look like? Two shots to the chest. One to the head. Two shots to the chest causes catastrophic internal organ damage. One shot to the head, after the two shots, results in a very high chance of killing the enemy. This is the fastest and most efficient way to kill the enemy, and it will conserve your ammo.** The next thing I would like to talk about is buddy rushing. **In order to take an objective held by President Trump and his forces, you should rush the enemy in pairs of two.** One of you should provide covering fire for your buddy who runs towards the objective, and you proceed to take turns rushing and providing covering fire. Use walls for cover, use the slice the pie technique to peel out of the corner just enough to conceal your body and shoot at the same time. God bless America. God bless our troops. God will protect you. Trust in God."

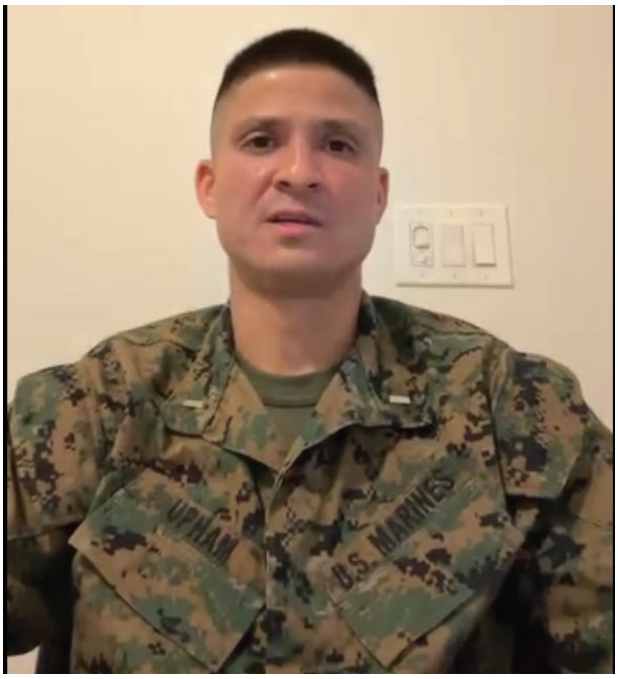
(emphasis added).

8. On July13, 2026, UPHAM posted a second video, again wearing military fatigues, in which he stated the following:

For God and country. This is the motto of my campaign. I decided to run for office to fix our broken political system. To restore bipartisanship, return power to the working class, and end our system of Washington insiders, extremism, and excuses from our current members of Congress. I've reached a turning point in my campaign. Why? I've come to the realization that our country is broken. We are led by a President who's the enemy of God and President Trump will never bring us together like God intended. Democrats are wrong because they're wrong on the commonsense issues. Enforcement of our criminal laws, border security, national security, and social issues that are 80/20. Republicans are wrong because they never addressed the racism and discrimination that has persisted in our country for generations. Is our country salvageable? Maybe it is. Our founding fathers intended us to be the freest country on this planet. And that's what we became. But in doing so, we became the most selfish. We turned away from God. We turned away from love and kindness. And we turned away from putting others first. I served in the United States Marine Corps. I swore an oath when I was commissioned. I, William Upham, do solemnly swear, that I will support and defend the Constitution of the United States against all enemies foreign and domestic so help me God. I joined the United States Marine Corps to defend our country against all enemies, including the enemies here at home. This principal of defending others, especially the innocent and the vulnerable, is seen in the Bible in many passages. In Esther Chapter 8 Verse 11, the prime minister of Persia authorized the right for Jews to defend themselves and women and children from armed attackers. In Nehemiah, Chapter 4, Verse 13, builders armed themselves and were stationed for self-defense purposes, with Nehemiah stating, 'Fight for your brothers, your sons, and your daughters.' This biblical principle can be summarized in the following: God values life and although self-defense is not explicitly endorsed, it is implied through these passages and should be used to protect the innocent and the vulnerable. Violence should never be used for evil purposes such as vengeance or plunder. This is a message to all of God's children in our country. We must defend ourselves against all enemies. We are at war with evil. This is a war between God and the Antichrist. **There is no doubt in my mind that the President of the United States Donald J. Trump is the Antichrist. He is a false Messiah, and he is your enemy and he must be killed.** Why do I believe this? President Trump posted an AI-generated image of him in the likeness of Jesus Christ. He has also criticized the Pope. He is nothing like Jesus Christ. In Thessalonians Chapter 2 Verses 3-12, Apostle Paul describes the "man of lawlessness"

> otherwise known as the Antichrist. As someone who opposes God, worships himself, and claims to be God. In Revelation Chapter 13, Verses 1-8, John describes the Antichrist as a ruler backed by Satan who demands to be worshipped. Blasphemes God and wages war on our Saints. All of these Antichrist descriptions describe President Trump. If you disagree with me, you must ask yourself. Is your perspective clouded by MAGA ideology? Are you worshipping a false idol? Is President Trump anything like Jesus Christ? The book of Revelation is occurring right now. America is Babylon. God and is angels have condemned our country because we are drowning in sin. Who are we now? We are selfish, worshipping ourselves and false idols, not showing love or kindness to our fellow Americans, and treating life without love and dignity. Instead of remembering our founding father's intention of a nation under God, we have lost sight of God and treated him like he was an accessory. We've become too proud to be an American and not proud enough to be God's child. I ask this question to all of you. Is it too late for us to turn from our sins? Is it too late for America? My answer is no. It's not too late. The lamb will be sacrificed to pay for all of our sins. And our country will be saved from the Babylon that we have become. **President Trump is the Antichrist and he will be killed and sent to hell.** God will prevail against evil.

(emphasis added). I personally reviewed both videos detailed above. A screenshot of this video depicting UPHAM is copied below:



9. I received the following information from other agents within the USSS. On July 15, 2026, an individual who stated he is a reporter with a newspaper contacted the USSS and stated that he contacted UPHAM via email with some questions concerning the video UPHAM posted that are detailed above. The reporter indicated that UPHAM replied via email to his questions, in part, by making the following statements:

> I made this video in uniform to declare war against President Trump on behalf of God. The uniform represents the Holy War between God and the Anti-Christ.
>
> I will kill President Trump at the time that God chooses, not when I choose. Our county must overthrow President Trump by the violent use of force and kill him.

The USSS obtained a copy of this email, which I observed was sent from the same email address as the one listed on UPHAM's Florida Bar profile

(upham.william1@gmail.com). I also observed that the email concerns the same subject matter, is in the same tone, and uses similar verbage as the statements made in the videos detailed above, posted by UPHAM.

10. UPHAM's Facebook account indicated that he resides in Jacksonville, Florida. The USSS obtained information indicating that UPHAM has access to firearms, specifically that UPHAM purchased two firearms at a pawn shop in Virginia in June 2024. Moreover, Jacksonville Sheriff's Office (JSO) officers were dispatched to UPHAM's residence on July 5, 2026, to perform a welfare check. During this encounter, UPHAM stated that he was the Messiah and that God had ordered him to die; I know about this encounter from reviewing the relevant JSO reports. JSO also went to UPHAM's residence on July 14, 2026, and again confirmed he was at that residence.

11. Based on the foregoing information, I respectfully submit that there is probable cause to believe that beginning on or about July 13, 2026 and continuing through on or about July 15, 2026, in the Middle District of Florida, William UPHAM knowingly made a true threat to kill the President of the United States, in violation of 18 U.S.C. § 871.

John Rolander, Special Agent
United States Secret Service

Affidavit submitted to me by reliable electronic means and attested to me as true and accurate by telephone or other reliable electronic means consistent with Fed. R. Crim. P. 4.1 and 4(d) before me this 15th day of July, 2026.

HON. SAMUEL J. HOROVITZ
United States Magistrate Judge