

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA )

v. )

JOSEPH MENDEZ, )

Case No. 5:26-MJ-36 (ML)

Defendant. )

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 February 13, 2026 in the county of Oneida in the Northern District of New York the defendant violated:

Code Section
18 U.S.C. § 871

Offense Description
Making threats against the President of the United States

This criminal complaint is based on these facts:
See attached affidavit.

[X] Continued on the attached sheet.

tzalenski

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Date: 2026.02.13 19:16:05 -05'00'

Complainant's signature

Tracy Zalenski, Resident Agent in Charge, US Secret Service

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: February 13, 2026

Miroslav Lovric

Judge's signature

City and State: Binghamton, NY

Hon. Miroslav Lovric, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, TRACY ZALENSKI, being duly sworn, deposes and states as follows:

1. I have been employed as a Special Agent with the United States Secret Service (USSS) since 2008. The USSS is an agency within the Department of Homeland Security (DHS), which is a department within the executive branch of the United States Government. I have received extensive formal training in criminal investigations and the examination of evidence, to include the investigation of crimes involving threats to the President, the Vice President, their families, and others under the protection of the Secret Service. I have received training from the Federal Law Enforcement Training Center, Glynco, Georgia, and the United States Secret Service, Beltsville, Maryland.

2. As a Federal Agent, I am authorized to investigate violations of federal criminal laws including such offenses related to protective intelligence and threats made against the President of the United States and successors to the Presidency. Specifically, one of the areas which I have investigative responsibility involves violations relating to threats against the President and successors to the Presidency, Title 18, United States Code, Section 871.

3. I make this Affidavit in support of an application for a criminal complaint and arrest warrant for Joseph MENDEZ (hereinafter MENDEZ), date of birth (DOB) XX/XX/1984, for violations of Title 18, United States Code, Section 871.

4. I make this Affidavit from personal knowledge based on my participation in this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of securing an arrest warrant and establishing probable cause that MENDEZ committed the above-listed offense. This Affidavit

does not contain all details or facts known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that MENDEZ, knowingly violated Title 18, United States Code, Section 871, Threats against President and successors to the Presidency. The information that I have set forth herein I believe to be reliable based upon my investigation to date.

5. As more fully set out below, this investigation has developed evidence and information that MENDEZ knowingly and willfully made threats to take the life of and inflict bodily harm upon the President of the United States.

**PROBABLE CAUSE**

6. On or about February 9, 2026, the Federal Bureau of Investigation (FBI)/National Threat Operations Center (NTOC) received an anonymous tip regarding alleged threats against the President of the United States and others posted by Facebook user Joseph MENDEZ. The anonymous tipster provided the following identifiers for the subject:

NAM: Joseph MENDEZ  
DOB: XX/XX/1984  
PHN: 315-XXX-6734

According to the tipster, MENDEZ "threatened to execute the president, Elon Musk, the Washington, D.C. Mayor, and states that he is Jesus Christ."

7. On February 13, 2026, other assisting law enforcement officers and I located and interviewed MENDEZ at his residence in Yorkville, NY. I identified myself as an agent with the US Secret Service. MENDEZ confirmed his identity and agreed to be interviewed.

8. MENDEZ stated that he had a plan to travel to Washington, D.C. to "execute the

President.”<sup>1</sup> When questioned further on the plan, MENDEZ stated that he would “travel by vehicle, walk into the White House, grab them...make them take their clothes off...the President, Elon Musk, Bill Gates, and Mark Zuckerberg, and kill all of them.” MENDEZ stated that he has ill feelings for the President because of what information was released in the Epstein files. MENDEZ stated that no one should prey on adolescents. MENDEZ was asked to clarify his timeline for his travel to Washington, D.C. MENDEZ stated, “very soon.” MENDEZ stated that someone must do something soon and that he is the king.

9. When asked if he had sought any treatment for any mental health issues, MENDEZ stated that he does not value any health professional’s opinions and will not speak with them. MENDEZ stated that he does not own any weapons but does train with rifles and pistols at a local firing range with a friend in law enforcement.

### CONCLUSION

10. The investigation has revealed that MENDEZ, knowingly violated Title 18 USC Section 871, by uttering statements in which he threatened to kill the President of the United States. These statements were made to the USSS and Task Force Officers of the FBI’s Joint Terrorism Task Force (JTTF).

11. Based on the foregoing, your affiant respectfully submits that there is probable cause to believe that on February 13, 2026, MENDEZ violated Title 18, United States Code, Section 871, Threats against President and successors to the Presidency.

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<sup>1</sup> The content contained in quotation marks in this paragraph are the sum and substance of MENDEZ’s statements.

ATTESTED TO BY THE APPLICANT BY TELEPHONE IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE

*Tracy Zalenski*

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Tracy Zalenski

Resident Agent in Charge, U.S. Secret Service

I, the Honorable Miroslav Lovric, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on February 13, 2026, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

*Miroslav Lovric*

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Honorable Miroslav Lovric