AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Northern District of New York

UNITED STATES OF AMERICA)
v.)
)Case No. **5:26-MJ-233 (MJK)**
CHRISTOPHER VINOGNA)
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 October 6, 2026 in the county of Oneida in the Northern District of New York the defendant(s) violated:

Code Section	*Offense Description*
Title 18, United States Code, Section 871	**Making Threats Against the President of the United States**

This criminal complaint is based on these facts:
See Attached Affidavit

☒ Continued on the attached sheet.

Tracy Zalenski
Complainant's signature
Tracy Zalenski, Special Agent, U.S. 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: October 9th, 2026

Mitchell J Katz Digitally signed by Mitchell J Katz Date: 2026.10.09 09:32:56 -04'00'
Judge's signature

City and State: **Syracuse, New York**

Hon. Mitchell J. Katz, 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 empowered under the authority of Title 18, United States Code, Section 3056, 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 Christopher VIGNOGNA (hereinafter VIGNOGNA, date of birth (DOB) XX/XX/1999, 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 VIGNOGNA 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 VIGNOGNA 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 VIGNOGNA 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 October 7, 2026, the Rome Police Department notified the USSS regarding alleged threats against the President of the United States verbally stated by Christopher Matthew VIGNOGNA, after making contact at VIGNOGNA's place of work in Rome, NY

to investigate a complaint that VIGNOGNA asked a co-worker to inquire if her boyfriend could him buy a gun so he could shoot the President at a rally in Syracuse on 10/9, Rome PD then provided the following identifiers for the subject: Christopher Matthew VIGNOGNA, DOB: XX/XX/1979, SSN: XXX-XX-3580

7. On October 7, 2026, the above-mentioned co-worker was interviewed by Rome PD and provided a written statement stating on October 6, 2026, VIGNOGNA asked twice if her boyfriend could buy him a gun. The co-worker stated twice, "No, why?" After the second time, the co-worker stated that VIGNOGNA stated "Trump is coming to Syracuse I want shoot him". The co-worker stated that VIGNOGNA made a gesture of a gun in his hand while making this statement.

8. On October 7, 2026, USSS and Onondaga County Sheriff interviewed VIGNOGNA at his residence in Syracuse, NY. VIGNONGA confirmed that he made the above comments to his co-worker but stated that he was just joking and didn't think he would be taken seriously.

9. On October 7, 2026, Rome PD interviewed an additional co-worker / witness at VIGNOGNA's place of work. The co-worker stated that on October 6, 2026, she heard VIGNOGNA telling the other co-worker that he wanted to "shoot everything up". Additionally, the co-worker heard VIGNOGNA trying to talk politics with her even after the co-worker said no.

CONCLUSION

10. The investigation has revealed that VIGNONGA knowingly violated 18 U.S.C. § 871 by uttering statements in which he threatened to kill the President of the United States.

11. Based on the foregoing, your affiant respectfully submits that there is probable cause to believe that on October 6, 2026, VIGNOGNA violated Title 18, United States Code, Section 871, by making threats to kill the President of the United States.

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

Tracy Zalenski

Tracy Zalenski
Special Agent, U.S. Secret Service

I, the Honorable Mitchell J. Katz, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by video conference on October 9, 2026 in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Mitchell J Katz Digitally signed by Mitchell J Katz
Date: 2026.10.09 09:33:23 -04'00'

Hon. Mitchell J. Katz
United States Magistrate Judge