United States District Court

for the
Western District of New York

United States of America

v.

JOSEPH LEONE

Defendant

Case No. 26-MJ-1149

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 April 26, 2026, in the Western District of New York, and elsewhere, the defendant, JOSEPH LEONE, through an instrument of interstate and foreign commerce, and in and affecting interstate and foreign commerce, maliciously conveyed false information knowing the same to be false, concerning an attempt to kill, injure, and intimidate any individual, and unlawfully to damage and destroy a building by means of an explosive.

All in violation of Title 18, United States Code, Section 844(e).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

Andrew Brodell

Complainant's signature

ANDREW BRODELL
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Printed name and title

Sworn to before me and signed telephonically.

Date: September _29___, 2026

Judge's signature

HONORABLE JEREMIAH J. McCARTHY
UNITED STATES MAGISTRATE JUDGE

Printed name and title

City and State: Buffalo, New York

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I. INTRODUCTION

I, **ANDREW BRODELL**, Special Agent of the Federal Bureau of Investigation, United States Department of Justice, having been duly sworn, states as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). As such, I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to execute search and seizure warrants for offenses enumerated in Title 18, United States Code, Section 2516.

2. I have been so employed as a Special Agent (SA) of the FBI since October of 2024 and am currently assigned to the Joint Terrorism Task Force ("JTTF") in Buffalo, New York. During my time at the FBI, I have participated in investigations involving counterterrorism, violent crime, organized crime, frauds, and drug trafficking. In addition, I have had the opportunity to work with other FBI Agents and other law enforcement Agents and officers of varying experience levels, who have also investigated these crimes in the Western District of New York. My training and investigative experienced detailed herein, and the experiences of other law enforcement agents, who are participating in this investigation, serve as the basis for the opinions and conclusions set forth herein.

3. This affidavit in being submitted or a limited purpose, that is, a probable cause determination. Therefore, I have not presented all the facts of this investigation to date. I

have set forth only the information I believe to be necessary to establish probable cause. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement personnel. This affidavit is intended to show merely that there is sufficient probable cause and does not set forth all of my knowledge about this matter.

4. I make this affidavit in support a criminal complaint charging **JOSEPH P. LEONE** (LEONE) with violations of Title 18, United States Code, Section 844(e). This affidavit is being submitted or a limited purpose, that is, a probable cause determination. Therefore, I have not presented all of the facts of this investigation to date. I have set forth only the information I believe to be necessary to establish probable cause. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested Criminal Complaint and does not set forth all of my knowledge about this matter.

II. PROBABLE CAUSE

5. Based on my review of records obtained during the investigation and law enforcement databases, and my conversations with other law enforcement agents and others, I have learned, among other things, that:

6. The FBI is investigating the user of Instagram "joe_1eone." Instagram is a social media application that allows users to communicate both privately and with large audiences. Users can send messages, share media, and engage in video calls and voice chats.

7. Georgia Power ("GA Power") operates nuclear power plants in Georgia. On April 26, 2026, GA Power received a private message on its publicly available Instagram account ("ga_power"), via the Meta Business Suite, stating the following:

> "I am active employee at GA Power. I have planted a detonation device inside your office headquarters. You have until Friday 5pm ON THE DOT to figure out a way to make things right to the citizens of Little Neck Rd in Savannah, where you cut down their 300 year old oak."

The message was sent from an Instagram account with the username "joe_1eone." Based on my training and experience, I know that Instagram operates in interstate commerce.

8. GA Power sent this threat to law enforcement, which resulted in significant responses from federal, state, and local resources, as well as fire department resources for an extended period of time. The threat also halted work and promoted emergent evacuation and lock down at two headquarters facilities, one in Atlanta, Georgia, and one in Savannah, Georgia.

9. Bomb squads, supported by police and fire resources, swept the facilities for explosive devices. The lockdown had significant operational and financial implications for both facilities and created a massive fear implication for Georgia Power. Ultimately, no explosive device was located.

10. Reporting regarding the threat to Georgia Power was initially acquired directly from Georgia Power employees and law enforcement resources that responded to the threat.

11. On September 2, 2026, Meta Platforms, LLC provided search warrant returns to FBI Buffalo regarding the username "joe_1eone." Meta Platforms, LLC verified the operator of "joe_1eone" is name "Joe Leone", date of birth "March 21, 2003," email

"joeleone223@gmail.com," gender "male," phone number "+17164824975." The threat sent to "ga_power," as described in paragraph five, was also found in the search warrant returns. The returns stated that the "joe_leone" account was logged in from an iPhone 17 when the threat was sent. Per the Meta Platforms, LLC returns, on April 26, 2026, 11:58:38 UTC, the Internet Protocol (IP) address of the joe_1eone account was 67.246.166.59.62067, which resolves to East Aurora, New York. In addition, the date of birth contained in the search warrant returns matches the known date of birth of the JOSEPH LEONE identified in Attachment A-1.

12. AT&T disclosure returns showed that JOSEPH LEONE, phone number "+17164824975" lives at 700 N Davis Road, Elma, NY 14059. However, DMV results for JOSEPH LEONE showed an updated address of 12835 Whitney Road, Holland, NY 14080, confirming LEONE still lives in western New York.

13. Surveillance of 12835 Whitney Road, Holland, NY 14080 from August 26, 2026, to September 22, 2026, has shown LEONE leaving 12835 Whitney Road, Holland, NY 14080 on multiple mornings.

14. **WHEREFORE**, based upon the foregoing, I respectfully submit that there is probable cause to believe that **LEONE** did knowingly, willfully, and unlawfully violate Title 18, United States Code, Section 844(e). I further request that the proposed criminal complaint, this affidavit, and the requested arrest warrant be sealed and remain under seal until such time as the arrest warrant is executed.

Andrew Brodell

ANDREW BRODELL
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed

telephonically this 29th day of

September, 2026.

HONORABLE JEREMIAH J. McCARTHY
United States Magistrate Judge