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**United States District Court**  
**EASTERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

*Plaintiff,*

v.

**JACOB WRAY HUDSON,**

*Defendant.*

**CRIMINAL COMPLAINT**

**Case No. 25-MJ-468-JAR**

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I, Duston M. Todd, the undersigned complainant, state that the following is true to the best of my knowledge and belief:

Beginning on or about October 29, 2025, and continuing through on or about November 20, 2025, in the Eastern District of Oklahoma, **JACOB WRAY HUDSON**, committed the offense of Sending Threatening Communications in Interstate Commerce, in violation of Title 18, United States Code, Section 875(c).

I further state that I am a Task Force Officer with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See Affidavit of Duston M. Todd, which is attached hereto and made a part hereof by reference.)

Continued on the attached sheet.



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Duston M. Todd  
Task Force Officer  
Federal Bureau of Investigation

Sworn to on December 19, 2025.

JASON A. ROBERTSON  
UNITED STATES MAGISTRATE JUDGE  
Title of Judicial Officer



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Signature of Judicial Officer



**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Duston M. Todd, a Task Force Officer with the Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

**Introduction**

1. I am a Task Force Officer (“TFO”) with the Federal Bureau of Investigation (“FBI”) and have been such since March of 2018. I am currently assigned to the Oklahoma City Division, Muskogee Resident Agency, and work primarily Indian Country criminal investigations. As a Task Force Officer with the FBI, I am authorized by the Attorney General to investigate violations of Federal law and request warrants. I have been a law enforcement officer since March of 2013 and am currently employed as a Criminal Investigator by the Muskogee (Creek) Nation (“MCN”) Lighthorse Police Department. My responsibilities as a TFO include the investigation of possible violations of tribal, state, and federal law, including violations of the Major Crimes Act and the apprehension of fugitives. During my career, my investigations have included the use of various surveillance techniques and the execution of various search, seizure, and arrest warrants.

2. I respectfully submit this affidavit in support of a criminal complaint and arrest warrant for Jacob Wray Hudson, DOB: XX/XX/1988 and SSN: XXX-XX-2480, for the offense of Sending Threatening Communications in Interstate Commerce, in violation of 18 U.S.C. § 875(c).

3. This affidavit is based in part on my participation in this investigation, conversations with other law enforcement officers, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents

of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Furthermore, the facts and circumstances of this investigation have been summarized for the specific purposes of establishing probable cause and in support of this application. No attempt has been made to set forth the complete factual history of this investigation or all of its details. In making this affidavit, I am relying only on the facts stated herein.

**Probable Cause**

5. On November 18, 2025, the FBI Protective Services Admin Unit (“PSAU”) received notification from Supervisory Special Agent (“SSA”) Terrel Allen, who is assigned to the FBI Director’s Protection Detail, of a comment of concern made on Instagram on or about November 18, 2025, by an account with the username “batmanhudson” (“TARGET ACCOUNT”).

6. The comment made by the TARGET ACCOUNT also tagged<sup>1</sup> the Instagram accounts of FBI Director Kash Patel and Alexis Wilkins, and stated, “I tagged you both again and did it again and still nothing? You’re both gonna be publicly executed for hurting kids”. A screenshot of the threatening comment, shown below, was obtained from Alexis Wilkins’s Instagram account and provided to the FBI.

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<sup>1</sup> Tagging an account on Instagram results in users receiving notification when they are tagged in a post by its creator or mentioned in a comment (users can “mention” others by adding their username to a comment after “@”). Tagged users receive notifications alerting them to the post so they can view it as opposed to an untagged post which would likely go unseen.



7. It is known to me that Kash Patel is the current Director of the FBI who was sworn into office on February 21, 2025, after being nominated for the position by President of the United States Donald J. Trump in November 2024. It is also readily known to me that Alexis Wilkins and FBI Director Patel have been in a dating relationship for several years and are currently maintaining that relationship.

8. Based on the threat to FBI Director Patel and Alexis Wilkins, the FBI began to further investigate the TARGET ACCOUNT, to include viewing the information the TARGET ACCOUNT made publicly viewable. In doing so, it was learned that the TARGET ACCOUNT was associated with a linked Facebook account for an individual named Jacob Hudson.

9. The Facebook account for Jacob Hudson referenced graduating high school in Oklahoma and further investigation identified the account as potentially belonging to Jacob Wray Hudson (“HUDSON”). A records check of HUDSON found that he was arrested by the Muskogee Police Department (“MPD”) in September 2025. FBI personnel were able to match the known mugshot photo of HUDSON taken in September 2025 to the person in the photographs that were publicly viewable on the Facebook account for Jacob Hudson.

10. On November 19, 2025, the FBI interviewed HUDSON’s brother, B.H. During the interview, B.H. reported that HUDSON has very strong political beliefs which have previously

resulted in HUDSON being involved in fights with his family. B.H. reported that HUDSON is currently residing at their parent's house in Muskogee, Oklahoma.

11. During the interview, B.H. was asked about social media accounts belonging to HUDSON, and B.H. identified the TARGET ACCOUNT as being the Instagram account he knows belongs to HUDSON.

12. I conducted a records check of HUDSON and found that an Information was filed in Case CF-2025-489 in the Muskogee County District Court on or about September 16, 2025, charging HUDSON with attempted burglary in the first degree.

13. I reviewed an arrest and booking report regarding the incident authored by MPD Officer Joshua Garza, who reported that he was dispatched to a disturbance at a residence in the City of Muskogee on September 14, 2025. When Officer Garza arrived, he took HUDSON into custody after finding him attempting to break into his neighbor's residence. HUDSON was reportedly screaming death threats while attempting to break into the residence.

14. Officer Garza further included in his report that when he made contact with HUDSON, HUDSON was yelling about wanting to kill President Trump and "the Jews".

15. MPD Sgt. James Poffel also reported HUDSON screaming about wanting to kill President Trump and that HUDSON said he is "batman". The name "batman" was noted as being associated with the account name of the TARGET ACCOUNT.

16. FBI Special Agent ("SA") Eric Byrd and I located and interviewed HUDSON in Muskogee, Oklahoma, on November 21, 2025. During the interview, HUDSON admitted that the TARGET ACCOUNT was his account and that he had made the posting regarding the FBI Director referenced in paragraph 6 of this affidavit. HUDSON stated that he did this because all

he cares about is protecting children. While making this statement, he referenced the Epstein investigation.

17. HUDSON continued and stated that he believes the American people are going to hold the FBI Director accountable after the Epstein investigation is completed.

18. As part of the investigation, I served a search warrant, which was authorized through the United States District Court for the Eastern District of Oklahoma, to Meta Platforms, Inc. (“Meta”) on November 24, 2025, for records and information owned, maintained, controlled, or operated at its headquarters in Menlo Park, California. In response to the search warrant, Meta provided me with information related to the TARGET ACCOUNT, which I later reviewed.

19. During my initial review of the information related to the TARGET ACCOUNT, I found a series of threatening public comments made by HUDSON on the social media platform Instagram between on or about October 29, 2025, and continuing through on or about November 20, 2025.

20. On or about October 29, 2025, HUDSON commented on a publicly viewable Instagram post in which the Instagram accounts for Director Patel, President Trump, and United States Attorney General Pam Bondi were all tagged. In the comment, HUDSON threatened Director Patel by stating “I will literally slap the fuckin taste outta your mouth”.

@fbidirectorkash I will literally slap the fuckin taste outta your mouth if you keep bullshittin with the #releasetheepsteinfiles . Fuck you and @realdonaldtrump and @agpambondi and all the other pedos..how’s your mossad girlfriend doing bruh? Got stuck between a rock and hard place huh? Ain’t that abouta bitch. Fuck around and find out. Come get me hoe. Try me

21. On or about November 12, 2025, HUDSON commented on a publicly viewable Instagram post in which the Instagram accounts for Director Patel and Alexis Wilkins were tagged. Additionally, the account @potus, which is an official social media account for the President of

the United States, was tagged. In the comment, HUDSON threatened Director Patel, Alexis Wilkins, and others by stating “You’re all gonna be publicly executed after all this. . . . I promise you that.”

@fbidirectorkash @alexiswilkins 🍷 honey pot..what’s your boy you Kash doing? Distracting from the Epstein files and you being a honey pot and him being a corrupt agent? 😂😂 Fuck you and him and @foxnews and @potus and @b.netanyahu !! You’re all gonna be publicly executed after all this. And for what you tried to do to me and my family...I Promise you that. @americancongressparty #batmanhudsontheory @claytoncuteri @realcandaceowens @shawnryan762 @h1ddensh1tposter @0day @pradamarf @cenzodelavega

22. On or about November 17, 2025, HUDSON commented on a publicly viewable Instagram post in which the Instagram accounts for President Trump, Director Patel, and Alexis Wilkins were all tagged. In the comment, HUDSON threatened Director Patel, Alexis Williams, and others by stating “They are all finna lose their heads.. I promise.”

I don't fucking care fuck @b.netanyahu and @realdonaldtrump @fbidirectorkash his honey 🍷 @alexiswilkins They are all finna lose their heads.. I promise. 😏👑🍷👤👉

23. On or about November 18, 2025, HUDSON commented on a publicly viewable Instagram post in which the Instagram accounts for Director Patel and Alexis Wilkins were tagged. This posting was the initial posting reported by SSA Allen in which HUDSON made the threatening statement that both Director Patel and Alexis Wilkins would both be publicly executed.

24. On or about November 20, 2025, HUDSON commented on a publicly viewable Instagram post in which the Instagram accounts for Director Patel and Alexis Wilkins, as well as the accounts for former Presidents’ George W. Bush, Barack Obama, and Joe Biden were tagged. In this posting, HUDSON threatened Director Patel, Alexis Wilkins, and others by stating “They are all gonna get publicly executed too! ... you really do fail to realize who the fuck I am. . . . I’m

not bound by the normal laws you are.” The posting included the threatening statement “you’re all getting it too! All public executions!”. This statement was made after tagging the accounts for Presidents’ Bush, Obama, and Biden.

@yoshithepatriotxv lmfao fuck them too! They are all gonna get publicly executed too! You hear me @fbidirectorkash ? You and your 👑 girlfriend @alexiswilkins ! @yoshithepatriotxv you really do fail to realize who the fuck I am. 😂 I’m not bound by the normal laws you are. 😂 That’s why you have to edit your posts and I don’t. That’s why I tag whoever I want and say whatever I want have been for months. Haha I told you, you should’ve done your research. And @joebiden @hillaryclinton @georgewbush @barackobama you’re all gettin it too! All public executions!

25. Based on my training, experience, and research, I know that when users exchange messages via the Instagram application, such messages are routed through servers or data centers located outside the State of Oklahoma.<sup>2</sup>

26. I conducted additional records checks and found that threatening communications and behaviors made by HUDSON are not an isolated occurrence but an ongoing pattern spanning several years. In February 2022, the United States Air Force (“USAF”) 72<sup>nd</sup> Security Forces Squadron was notified of a complaint made by A.M. of HUDSON communicating threats to A.M., in violation of the Uniform Code of Military Justice (“UCMJ”). At the time of the report, HUDSON was a member of the USAF stationed at Tinker Air Force Base in Oklahoma.

27. A.M. reported that HUDSON had been sending text messages threatening to kill A.M. to a third party. USAF completed their investigation, but their reports reflect that HUDSON separated from the USAF prior to being able to charge him with a UCMJ Article 115 – Communicating Threats.

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<sup>2</sup> A list of data servers operated by Meta Platforms, Inc., which owns Instagram, contains no data center within the State of Oklahoma. See Data Centers, <https://datacenters.atmeta.com/all-locations/#united-states> (last accessed December 19, 2025).

28. In March 2023, N.M. filed a petition for a protective order against HUDSON in Oklahoma County District Court. In the petition, N.M. alleged that HUDSON contacted her friends via text message harassing them. N.M. also alleged that HUDSON hacked her iCloud account in January 2023, allowing him to send mass text messages with derogatory information regarding N.M. HUDSON reportedly threatened that if N.M. contacted law enforcement, it will be worse, and he will be armed.

29. N.M. reported that in March 2023, HUDSON was able to gain access to her Snapchat account where he proceeded to post nude photos and videos of N.M. These nude photos and videos were photos and videos that N.M. had previously sent to HUDSON.

30. A hearing regarding the protective order was held in the Oklahoma County District Court in June 2023, which resulted in the issuance of permanent protective order against HUDSON.

**CONCLUSION**

31. Based on the information set forth above, I respectfully submit that there is probable cause to believe that a violation of 18 U.S.C. § 875(c), Sending Threatening Communications in Interstate Commerce, has been committed in the Eastern District of Oklahoma by Jacob Wray Hudson and that a warrant should be issued for his arrest.

Respectfully submitted,



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DUSTON M. TODD  
Task Force Officer  
Federal Bureau of Investigation

Sworn to on this 19th day of December, 2025.



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UNITED STATES MAGISTRATE JUDGE