

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

March 20, 2024

**KAREN MITCHELL
CLERK, U.S. DISTRICT
COURT**

United States of America)

v.)

Jose Eusebio Medrano)

Case No. 3:24-MJ-270-BK)

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 January 24, 2024 in the county of Dallas in the Northern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 875(c)

Transmitting a Threatening Communication in Interstate Commerce

This criminal complaint is based on these facts:

Please see attached affidavit in support of criminal complaint.

Continued on the attached sheet.



Complainant's signature

Special Agent John Frederick Loomis III

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: March 20, 2024



Judge's signature

City and state: Dallas, Texas

RENÉE HARRIS TOLIVER, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Special Agent John Frederick Loomis III, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint charging **Jose Eusebio Medrano (Medrano)** with Transmitting a Threatening Communication in Interstate Commerce in violation of Title 18, United States Code, Section 875(c).

2. I am a Special Agent with the Federal Bureau of Investigation and have been since August 2023. I received training in conducting investigations and related legal matters at the FBI Academy in Quantico, Virginia. I am currently assigned to the Dallas, Texas, Field Office of the FBI. During my employment as an FBI Special Agent, I have participated in a variety of criminal investigations, including investigations involving public corruption and civil right violations. Through such investigations and training, I have become familiar with the patterns and activities of individuals who engage in civil rights violations including hate crimes and the use of social media platforms in criminal activity. I have worked with Agents who have experience investigating interstate transmissions of threatening communications made in violation of 18 U.S.C. § 875(c). I have also participated in the execution of a physical search warrant during these investigations.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit

is intended to show merely that there is sufficient probable cause to believe that **Medrano** has violated 18 U.S.C. § 875(c).

PROBABLE CAUSE

4. On January 24, 2024, an individual identified as **Medrano** posted two threatening statements on his public Facebook page that were directed at his neighbors, D.M. and M.V. Specifically, **Medrano** posted “These people across the street tryna get killed . . . go home Jew . . .”, and “Hope these fucking Jews die Seagoville Texas.” In other public posts, **Medrano** has accused D.M. and M.V. of “working for the Jews” and “using microwave auditory effect not sure the voices keep me up at night.”

5. Based on my training and experience, and under the circumstances described below, I believe that **Medrano**’s January 24th posts would have a reasonable tendency to cause D.M. and M.V. apprehension that **Medrano** may act on those statements and cause them harm. I also believe that **Medrano**, in making these Facebook posts, consciously disregarded a substantial risk that his communications would be viewed as threatening violence towards D.M. and M.V.

Background

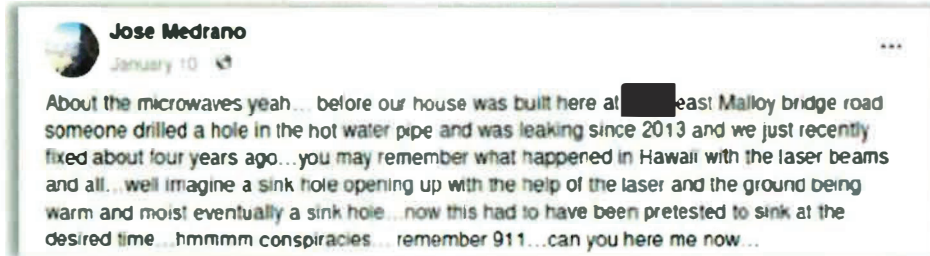
6. D.M. and her husband, M.V., reside at XXXX East Malloy Bridge Road, Seagoville, Texas 75159, and have lived at that address for approximately six months. Database checks revealed that **Medrano** resides at YYYY East Malloy Bridge Road, Seagoville, Texas, 75159, which is located directly across the street from the residence of D.M. and M.V.



7. Facebook records identified an account under the name **Jose Medrano**, with the phone number +12145573459, and the date of birth as June 12, 1987, matching the known identifiers for **Medrano**. Additionally, the Internet Protocol (IP) address for the creation of the Facebook account on August 13, 2022, was 47.222.102.105, which on August 13, 2022, resolved to address YYYY East Malloy Bridge Road, Seagoville, Texas, 75159.

8. On January 10, 2024, **Medrano** confirmed his address with the following Facebook post. **Medrano** posted: "About the microwaves yeah . . . before our house was built here at [YYYY] East Malloy bridge road someone drilled a hole in the hot water pipe and was leaking since 2013 and we just recently fixed about four years ago . . . you may remember what happened in Hawaii with the laser beams and all . . . well imagine a sink hole opening up with the help of the laser and the ground being warm and moist

eventually a sink hole . . . now this had to have been pretested to sink at the desired time . . . hmmm conspiracies . . . remember 911 . . . can you here me now . . . ”



January 24, 2024, Threatening Statements

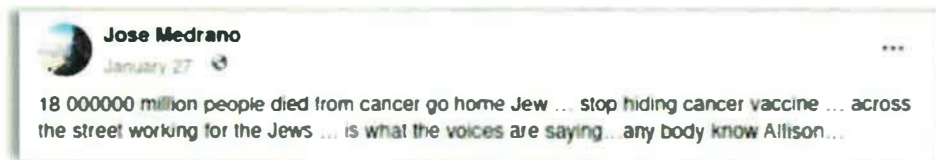
9. On January 24, 2024, **Medrano** posted two threatening statements targeting D.M. and M.V. on his Facebook page. Specifically, **Medrano** posted “These people across the street tryna get killed . . . go home Jew . . .”, and “Hope these fucking Jews die Seagoville Texas.”



January 27th and 28th Facebook Posts

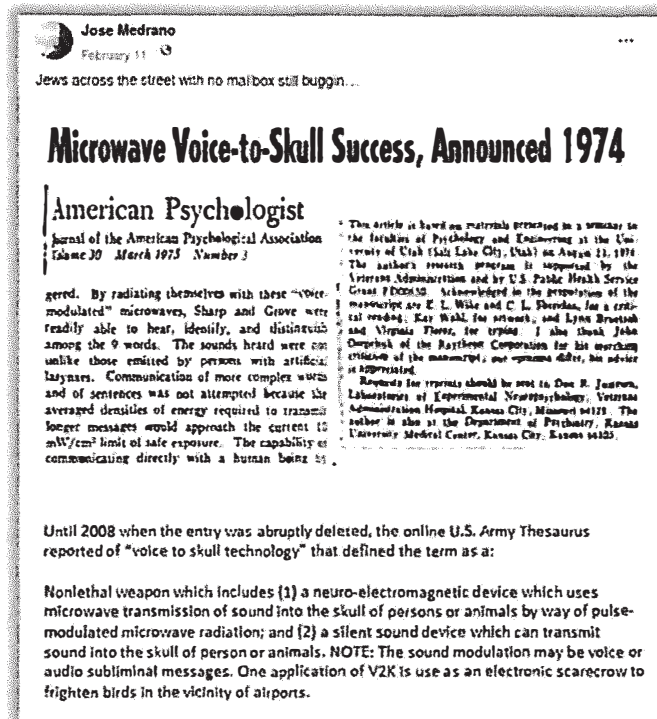
10. On January 27 and 28, 2024, **Medrano** again referenced his neighbors, D.M. and M.V., believing they work for Jews and are spying on him. **Medrano** posted

“18 000000 million people died from cancer go home Jew . . . stop hiding cancer vaccine . . . across the street working for the Jews . . . is what the voices are saying . . . any body know Allison . . . ” and “I think there are spy Jews across the street using microwave auditory effect not sure the voices keep me up at night...don’t know what there mad about they call out rando names just to fuck with you . . . ”



February 11th Facebook Posts

11. On February 11, 2024, **Medrano** again referenced his neighbors as being Jewish with an attached article about microwave voice to skull access. **Medrano** posted “Jews across the street with no mailbox still buggin . . . ” A review of Google maps street view showed no mailbox at the end of the driveway for XXXX East Malloy Bridge Road, D.M. and M.V.’s residence.



February 19th Facebook Post and February 20th Shooting Incident

12. On or about February 20, 2024, D.M. contacted Seagoville Police Department (SPD) to report an apparent bullet hole in her dining room ceiling. During the previous night, D.M. heard several gunshots in front of her residence and a loud bang at approximately 12:30 a.m. The following morning, D.M. reported finding broken glass bottles, glasses, plates, and vases across the end of her driveway. SPD investigated the scene, took photographs, and recovered an apparent 9mm bullet fragment from the corner of the dining room floor. D.M. and M.V. provided the photograph below to SPD.



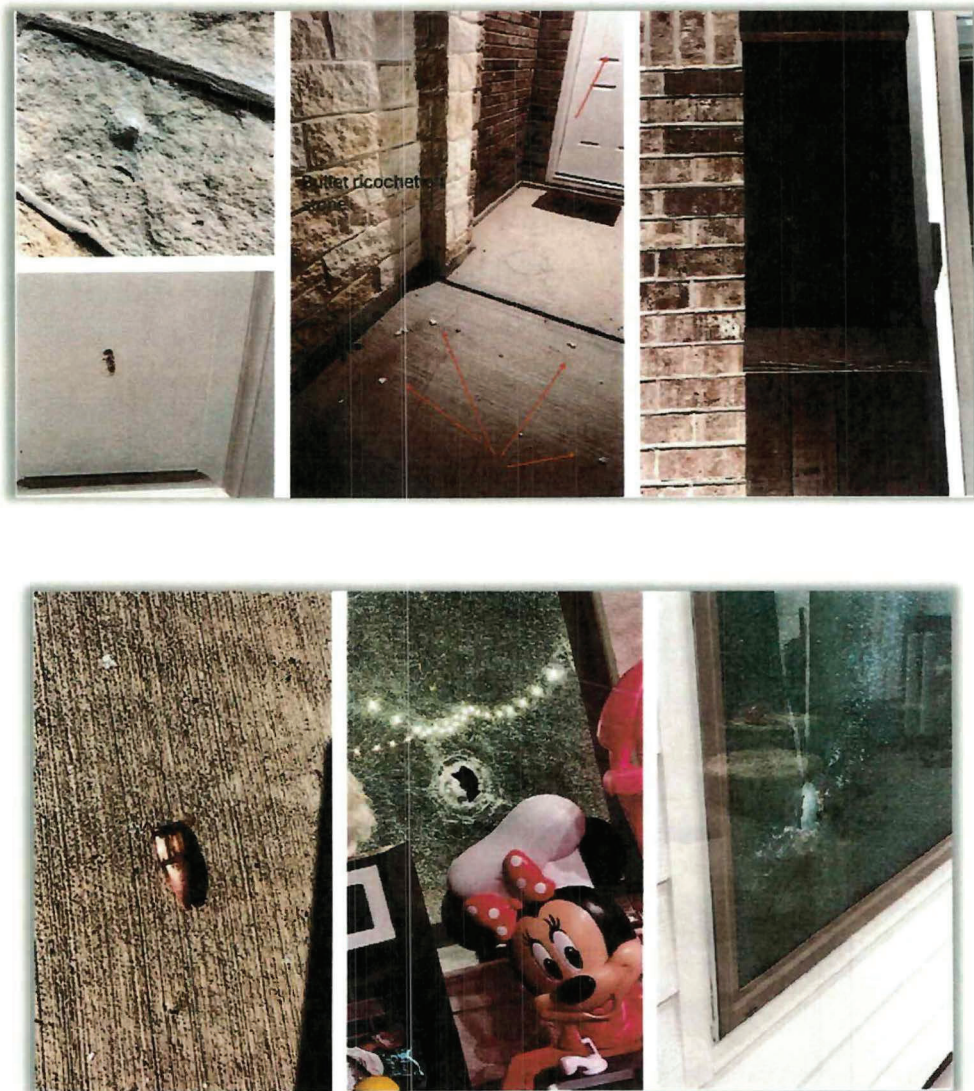
13. On February 19, 2024, the day before D.M. reported finding the bullet hole in her ceiling to SPD, **Medrano** posted on his Facebook “Shits going down tonight cuz I ain’t trippin...”



March 2 Shooting Incident and March 3 Facebook Posts

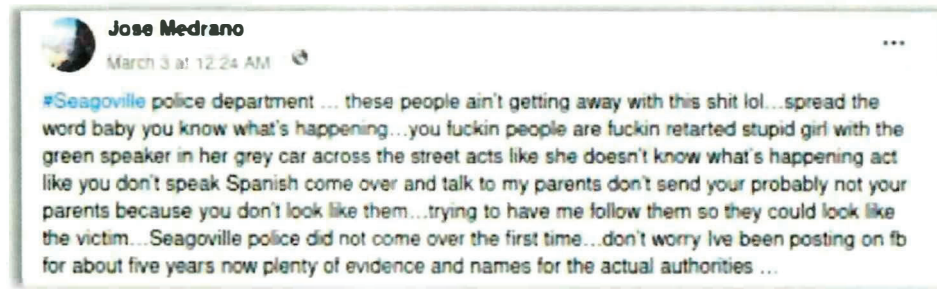
14. On March 2, 2024, M.V. reported to SPD that multiple bullets had been fired at the front of his and D.M.’s residence early that morning. D.M. reported hearing what sounded like six to eight gunshots that occurred close to his home. SPD investigated the scene and located approximately five impact locations on the front of the

house. SPD believed that the shots were fired from a high-powered rifle. All but one round hit the outer wall of the residence and became embedded in the wall. One round went through the front door and through a back window of the residence. SPD recovered a bullet from one of the impact points. D.M. and M.V. provided the photos below to SPD.



15. During an interview, D.M. told FBI Agents that she and her uncle, R.A., went to YYYY East Malloy Bridge Road on the afternoon of March 2, 2024, to inquire about the recent gunshots that were heard by her family and other neighbors the previous night. D.M. spoke to two individuals presumed to be Medrano's parents, E.M. and R.M. in their home. E.M. and R.M. stated they did not hear any activity that night and did not have any security cameras to check. During the conversation with E.M. and R.M., a man walked through the house wearing a balaclava, but neither E.M. nor R.M. engaged with the man. D.M. later believed the man to be **Medrano** after seeing him in similar attire from his social media posts.

16. On March 3, 2024, following the second incident in which shots were fired at the front of XXXX East Malloy Bridge Road and after D.M. and R.A. spoke with E.M. and R.M., **Medrano** posted “#Seagoville police department ... these people ain't getting away with this shit lol...spread the word baby you know what's happening...you fuckin people are fuckin retarded stupid girl with the green speaker in her grey car across the street acts like she doesn't know what's happening act like you don't speak Spanish come over and talk to my parents don't send your probably not your parents because you don't look like them...trying to have me follow them so they could look like the victim . . . Seagoville police did not come over the first time . . . don't worry Ive been posting on fb for about five years now plenty of evidence and names for the actual authorities . . .”



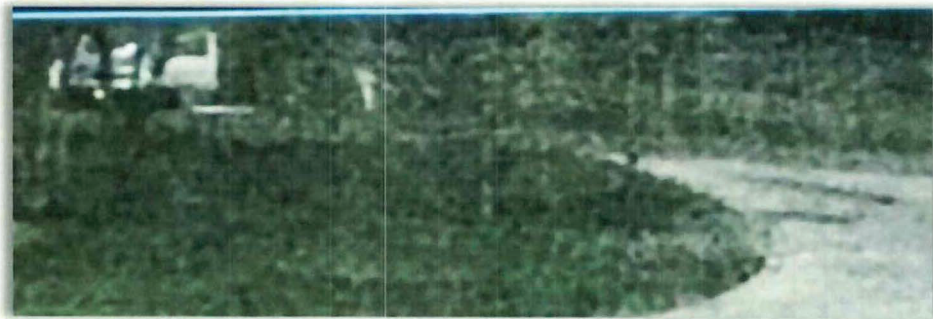
March 8th Graffiti Incident

17. On March 8, 2024, D.M.'s uncle R.A. was checking on the residence while D.M. was out of town. Upon arriving at the residence at XXXX East Malloy Street, R.A. found spray paint and motor oil spread across D.M.'s driveway. R.A. reported the graffiti to SPD. SPD responded and observed the words "GO HOME JEW" along with swastikas in silver spray paint. Additionally, there was approximately twenty (20) feet of motor oil, broken glass, and broken eggs across the driveway. SPD documented the scene via photographs.



18. Following the incident response on March 8, 2024, D.M. provided SPD with video camera footage depicting an apparent light-colored truck driving down her

neighbor's driveway, address YYYY East Malloy Bridge Road, Seagoville, Texas, 75159 in the early morning hours. The truck appeared to stop at the end of D.M.'s driveway. The driver then opened the door and exited the vehicle. A few seconds later, a dark-colored marking became visible at the end of D.M. driveway. The driver then re-entered the vehicle, closed the driver's side door, and exited the driveway onto East Malloy Bridge Road.

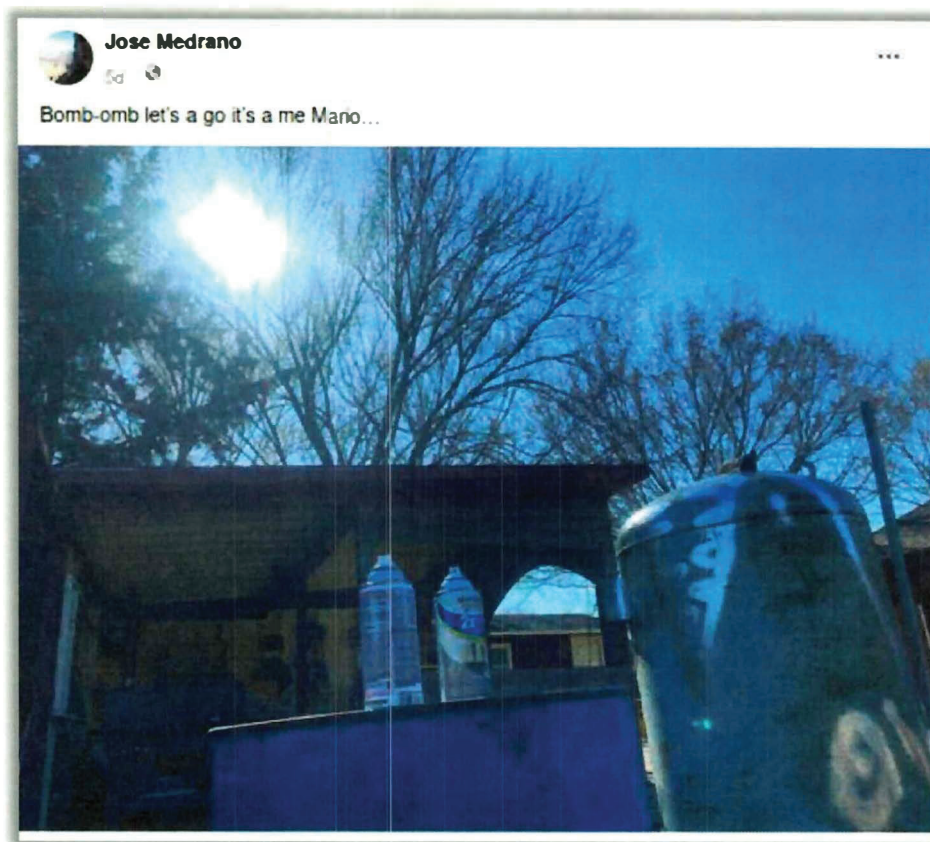


19. Additional camera footage provided by D.M depicts a silver four-door truck driving along East Malloy Bridge Road and stopping at the end of D.M. driveway on March 8, 2024, at approximately 6:57 PM. In the footage, the driver of the four-door truck appears to reach out the driver's side window and throw something onto D.M.'s driveway before getting back on to East Malloy Bridge Road and making an immediate right-hand turn into the driveway for YYYY East Malloy Bridge Road. During an interview with FBI Agents, D.M. and M.V. stated that they have seen **Medrano** driving a light-colored four-door Chevrolet truck.



March 10th Graffiti Incident and Facebook Post

20. On March 10, 2024, two days after the incident in which D.M. and M.V's driveway was tagged with oil and silver spray paint, **Medrano** posted a picture in an apparent backyard-work area that depicted cans of spray paint next to a metal tank with silver spray paint markings. The caption that Medrano posted alongside the photo stated "Bomb-omb let's go it's a me Mario . . ." Based on my training and experience, I understand **Medrano** to be referring to making explosive devices using the paint cans.

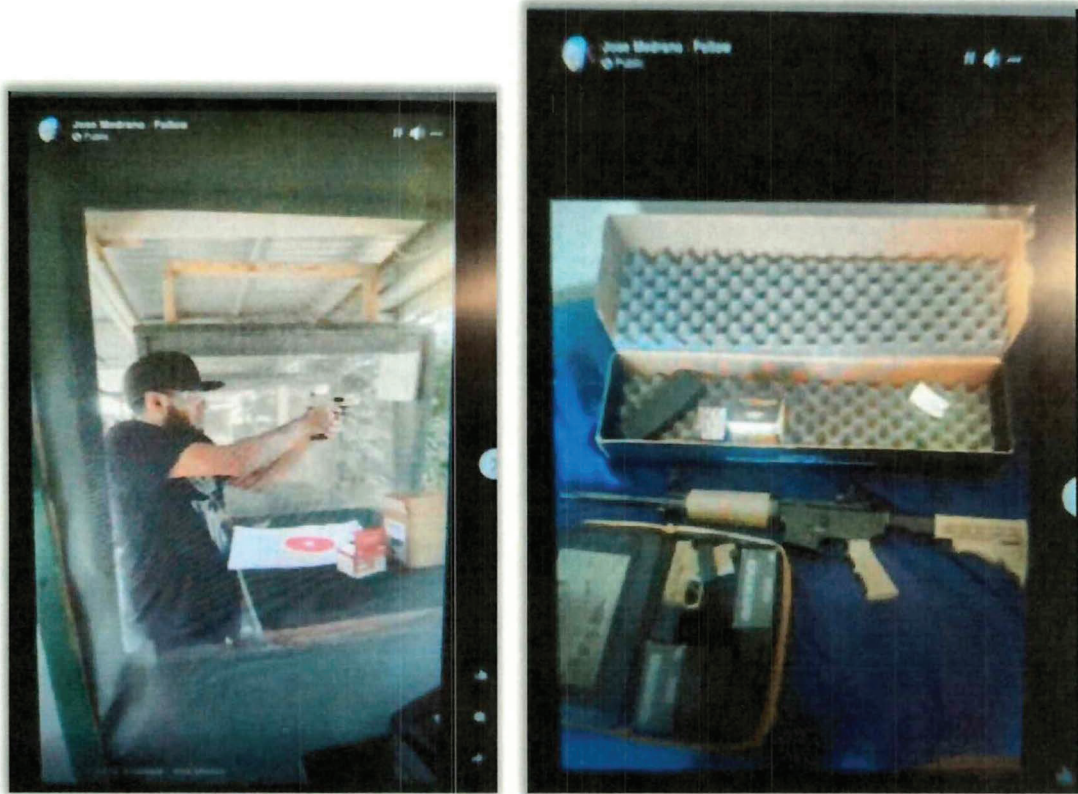


21. M.V. also reported finding additional objects thrown onto his driveway on March 10, 2024. SPD responded and observed a concrete sculpture of a pig face and a light fixture with small square tiles on the driveway.

Additional Facebook Posts by Jose Medrano

22. A review of records of **Medrano's** Facebook page was conducted and revealed that on November 12, 2023, **Medrano** posted a video in which he and others are at a gun range shooting multiple weapons, including both pistols and rifles. The ammunition used by these types of firearms are consistent with the 9mm bullet fragment recovered from D.M. and M.V.'s home on February 20th as well as the impact patterns

observed on D.M. and M.V.'s home and the bullet fragments recovered from the same on March 2nd.



CONCLUSION

23. Based on the information described above, there is probable cause for the Court to authorize a criminal complaint charging **Medrano** with Transmitting a Threatening Communication in Interstate Commerce in violation of 18 U.S.C. § 875(c).


24. **Medrano** has made threatening statements directed towards his neighbors via Facebook posts on January 24, 2024, which under the circumstances (i.e., the bullets and bullet holes in the home, and the spray paint on the driveway and the meeting

between the victims and **Medrano**'s relatives), would have a reasonable tendency to cause apprehension that **Medrano** may act on those statements.

25. Furthermore, in making these FB posts, the defendant consciously disregarded a substantial risk that his communications would be viewed as threatening violence.

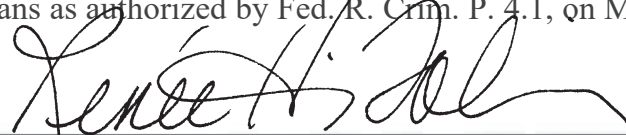
Attested to by the applicant in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedure.

Respectfully submitted,



John Frederick Loomis III
Special Agent
Federal Bureau of Investigation

Sworn to before me and Affiant's signatures confirmed, all via reliable electronic means as authorized by Fed. R. Crim. P. 4.1, on March 20, 2024.



HONORABLE RENÉE HARRIS TOLIVER
UNITED STATES MAGISTRATE JUDGE