

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

Case No. 26-mj-46

JUSTIN P. WARD,

Defendant.

COMPLAINT FOR VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 875(c)

BEFORE United States Magistrate Judge
Anita Marie Boor

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

COUNT 1

On or about January 29, 2026, in the Western District of Wisconsin and
elsewhere, the defendant,

JUSTIN P. WARD,

knowingly transmitted in interstate commerce communications containing threats to injure other persons, specifically, public Facebook posts which contained threats to kill agents with U.S. Immigration and Customs Enforcement, for the purpose of issuing a threat and with knowledge that the communications would be viewed as a threat.

(In violation of Title 18, United States Code, Section 875(c)).

This complaint is based on the attached affidavit of Federal Bureau of Investigation Special Agent Steven Telisak.

/s/
Steven Telisak, Special Agent
Federal Bureau of Investigation

Sworn to telephonically this 2nd day of February, 2026.

/s/ Anita Marie Boor

HONORABLE ANITA MARIE BOOR
United States Magistrate Judge

investigation, but rather only those facts that I believe are sufficient to establish the requisite probable cause.

4. On January 29, 2026, the Gogebic County (Michigan) Sheriff's Office (GCSO) reported to FBI Detroit that deputies went the residence of JUSTIN P. WARD in Ironwood, Michigan, to arrest WARD for violations of Michigan law. Specifically, GCSO reported that it had probable cause to arrest WARD after WARD threatened to kill an Ironwood Public Safety Worker and that worker's family on January 28, 2026. GCSO reported that WARD had also texted the worker on the morning of January 29, 2026, indicating that WARD was at the worker's house.

5. GCSO did not locate WARD at his residence. In an attempt to learn where WARD might be, deputies viewed a publicly available Facebook profile that deputies believed, based on prior professional contact, was used and controlled by WARD. The display name for this profile was "Wild Henry Gunner."

6. GCSO located public-facing posts made by the account on January 29, 2026, which indicated that WARD was traveling to Duluth and was enroute at the time deputies viewed the posts. GCSO also located eight comments by WARD, posted in quick succession, to an earlier Facebook post made by WARD. These comments indicated that WARD intended to kill ICE agents and included the following:

- Sometime after 12:22 pm Central Standard Time (CST), the account publicly commented: "Now the game continues as wild Henry Gunner makes his way to the metropolitan area to kill some ice agents with his large testicles."

- Sometime shortly after the initial comment, the account publicly commented: "I'm gunna need a long distance relationship with a .308."
- Sometime shortly after the second comment, the account publicly commented: "That's already sighted in [finger gun emoji]."
- Sometime shortly after the third comment, the account publicly commented: "Any body got one? I would prefer to sit in a window and snipe some police and ice."
- Sometime after the fourth comment, the account publicly commented: "Or a place to crash that has a window oh nevermind I just found one."

7. At approximately 3:58 pm CST time, approximately three a half hours later, WARD posted that he was going on "spontaneous trip to Kansas" so he doesn't get murdered by local police.

8. I know from training and experience that a .308 caliber rifle is a popular firearm for hunting and recreation.

9. I also know that from training and experience that a sight is an aiming device that is mounted to a firearm, such as a .308 rifle. A sight allows firearm users to align the barrel of a firearm with a target for accurate shooting.

10. I am further aware that since at least mid-January 2026, through the present, ICE has carried out well-publicized and widely reported immigration enforcement activities in Minneapolis, Minnesota. As of January 29, 2026, hundreds of ICE agents were publicly known to be operating in Minneapolis.

11. Based on the above-referenced posts and the fact WARD was not located at his home in Ironwood, FBI Detroit obtained emergency location information for a phone number identified as WARD's by GCSO. I know from a review of reports prepared by GCSO that GCSO previously identified this number as used by WARD. Further, WARD used this number to communicate with the public safety worker on January 28 and January 29, 2026.

12. Location data provided by the service provider for WARD's number reflected that on January 29, 2026, the phone associated with WARD traveled westbound from upper Michigan across northern Wisconsin and towards Duluth, Minnesota.

13. FBI conducted an analysis of cell provider tower data to determine that at approximately 12:22 pm CST, at the time the Facebook posts regarding the threats to ICE agents were made to Facebook, the phone associated with WARD was travelling westbound on US-2 in northern Wisconsin near Ashland, Wisconsin.

14. I know that Ashland is in the Western District of Wisconsin.

15. I have reviewed information from the public-facing Facebook profile that GCSO identified as used by WARD. On January 7, 2026, WARD posted a picture of himself holding what appears to be a rifle. Also on January 7, 2026, WARD posted a picture of what appeared to be a Mac-10 sub-machine gun with an ammunition magazine and muzzle suppressor. On January 23, 2026, WARD posted pictures of what appeared to be two firearms: a picture of a firearm that WARD called a "saiga" rifle in

an earlier Facebook post, a picture of a firearm resembling those meant to fire gas canisters or explosive rounds.

16. I know from training and experience that a Saiga is a Russian arms manufacturer which manufactures semi-automatic rifles like the Russian AK-47.

17. Based on the foregoing, I submit that probable cause exists to believe that on or about January 29, 2026, WARD violated Title 18, United States Code, Section 875(c). Accordingly, I respectfully request the Court issue a complaint charging WARD with that crime.

Steven Telisak, Special Agent
Federal Bureau of Investigation

Subscribed to telephonically this 2nd day of February, 2026.

/s/ Anita Marie Boor

Honorable Anita Marie Boor
United States Magistrate Judge