

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
26-mj-74 (DLM)

UNITED STATES OF AMERICA

v.

JAMES PATRICK LYONS

FILED UNDER SEAL

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joel Smith, being first duly sworn, hereby depose and state as follows:

Introduction And Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), currently assigned to the FBI Minneapolis Division, I have been employed as an FBI Special Agent since March, 2016. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of Federal criminal laws. In my current duties as a Special Agent, I investigate criminal cases relating to violent crime primarily on Indian Reservations, as well as other crimes and criminal activity. I have received specialized training in criminal investigations, and I have investigated and assisted in the prosecution of several cases.

2. This Affidavit is submitted in support of a criminal Complaint alleging that, on or about January 18, 2026, James Patrick LYONS (YOB 1971) transmitted online threats to injure another person, namely five Federal law enforcement officers, namely Victims A through E, in violation of 18 U.S.C. § 875(c) ("Subject Offense"), via cellphone number **951-365-9435**, (the "Subject Phone").

3. The facts set forth in this Affidavit are based on my own personal knowledge of the investigation, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, my review of documents and records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This Affidavit, however, is intended to show only that there is sufficient probable cause to support the charges alleged in the Complaint and does not set forth all of my or the government's knowledge about this matter.

4. Based on my training and experience and the totality of the facts and circumstances set forth in this Affidavit, and the reasonable inferences therefrom, Your Affiant has probable cause to believe that LYONS committed the Subject Offense.

FACTS SUPPORTING PROBABLE CAUSE

Background

5. On January 14, 2026, a Homeland Security Investigations (HSI) federal agent with Immigration Customs Enforcement (ICE) Enforcement Removal Operations (ERO) was involved in a shooting that occurred in the area of the 600-block of 24th Avenue North, in Hennepin County, Minneapolis, MN, while conducting an immigration enforcement action. Agents from the FBI Minneapolis Violent Crime Squad and personnel from the FBI Evidence Response Team (ERT) responded to the scene to investigate the incident and to gather evidence.

6. After collecting evidence from the scene and during the course of their investigation, a large group of protestors became violent and made the scene unsafe. Due to the number of protesters and the increasing tension and violence, law enforcement personnel in the area were unable to maintain a perimeter, and FBI agents and ERT personnel were forced to evacuate the area on foot for their personal safety with the help of other law enforcement officers and agents who responded to the scene. FBI agents were forced to leave two government-owned vehicles parked near the scene.

7. Several protestors attacked, vandalized, damaged, and broke into the two government-owned vehicles left at the scene, causing over an estimated \$20,000 worth of damage to each vehicle, including broken windows and mirrors, spray painting of the exterior, punctured tires, damage to the engine and components, and ransacking and destruction of the interior of the vehicles. FBI-issued equipment and materials, including a rifle, rifle suppressor, a handgun, tactical vests, FBI IDs and building access badges, personal and various FBI documents were stolen from the vehicles. Some of the documents stolen contained rosters with employees' phone numbers, email addresses, and home addresses, as well as driver's licenses.

8. After the employees' personal information and documentation was compromised, several of the documents, including residential addresses, phone numbers, and emails, were posted publicly online on social media. Shortly thereafter, approximately 10 to 15 FBI Agents and employees began receiving multiple harassing and threatening phone calls, text messages and emails, and suspicious

drive-bys to their residences, where vehicles would slow down as they passed the employees' residences before driving away.

Review of Victim A's Cellphone

9. Victim A is an FBI SA with the Minneapolis Field Office, who had received multiple threatening phone calls and text messages after the January 14, 2026 incident described above, and whose information was contained on some of the documents stolen from the two government-owned vehicles that were damaged and ransacked by the protestors.¹ Victim A did not know the identity of any individuals who sent the threatening phone calls and text messages.

10. On January 18, 2026, at 8:59 am, Victim A received a threatening text message from phone number **951-365-9435** (Subject Phone). The message read: "Fuck you, [Victim A's first and last name], you motherfucking traitorous piece of shit ice agent. Burn in hell pussy. We know who you are and where to find you now. Tick tock motherfucker. 89B-MP-4181025."² Victim A perceived this as a threat to harm Victim A because their apartment key was among the items stolen from one of the government-owned vehicles damaged/destroyed during the violent protests that occurred on January 14, 2026, as described above.

January 21, 2026 Interview With Victim A

11. On January 21, 2026, FBI investigating agents interviewed Victim A. Your Affiant reviewed a report of the interview conducted with Victim A.

¹ Victim A's full name and identity is known to Your Affiant.

² The 89B number the caller typed in the text message is the FBI case number for the investigation of the damage/destruction of the two government-owned vehicles.

12. During the interview, Victim A indicated that they received multiple phone calls and text messages on their work cellphone that contained harassing and threatening communications. Victim A noted calls coming into their phone accusing them of being a pedophile. Victim A also noted that their personal information was doxed on Instagram, although their work phone number was transcribed incorrectly. Victim A reported receiving multiple threatening and harassing voicemails for over 24 hours, until Victim A was able to obtain a new work cellphone.

13. Victim A stated that the harassing and threatening calls and messages made Victim A very concerned for their personal safety. Victim A's apartment had been broken into on a previous occasion, and these messages brought back feelings of insecurity. Additionally, Victim A's residential apartment key was among the items stolen from the damaged/destroyed government vehicles on January 14, 2026. Victim A reported they have had difficulty sleeping as a result of receiving the multiple harassing and threatening voicemails and messages. Since the January 14, 2026 incident, Victim A discovered that Victim A's personal phone number and email address, as well as information about their family, are now all available on the Internet, but were not on the Internet prior to January 14, 2026.

Review of Victim B's Phone

14. Victim B is an FBI SA with the Minneapolis Field Office, who had received multiple threatening phone calls and text messages after the January 14, 2026 incident described above, and whose information was contained on some of the

documents stolen from the two government-owned vehicles that were damaged and ransacked by the protestors.³

15. On January 18, 2026, at 8:47 am, Victim B received a text message from Subject Phone which stated, "Fuck you, [Victim B's first name], you traitor piece of shit ice loser." Victim B received a subsequent text on the same date from Subject Phone at 8:56 am which stated, "Hey [Victim B's First name]! Burn in hell pussy. We know who you are and where to find you now. Tick tock motherfucker.."

January 21, 2026 Interview With Victim B

16. On January 21, 2026, FBI investigating agents interviewed Victim B. Your Affiant reviewed a report of the interview conducted with Victim B. Victim B first started receiving threats through a phone call on January 14, 2026, from an unknown person. Upon answering the phone, the unknown person asked, "is this [Victim B's first name]"? The unknown caller then stated, "you are on live stream, and all of your information is leaked." Victim B then began receiving consistent threats through text messages, voicemails, and phone calls from January 14, 2026 onward, after this particular call, including the texts from Subject Phone described above. Victim B perceived these specific threats to be extremely serious. Victim B stated that the threats sounded "crazy" at first, until an unknown individual showed up to Victim B's residence while his family was present at home.

³ Victim B's full name and identity is known to Your Affiant.

Victim C's Phone

17. Victim C is an FBI SA with the Minneapolis Field Office, who had received multiple threatening phone calls and text messages after the January 14, 2026 incident described above, and whose information was contained on some of the documents stolen from the two government-owned vehicles that were damaged and ransacked by the protestors.⁴

18. On January 18, 2026, at 9:00 am, Victim C received a text message from Subject Phone which stated, "Fuck you, [Victim C's full first and last name], you motherfucking traitorous piece of shit ice agent. Burn in hell pussy. We know who you are and where to find you now. Tick tock motherfucker.. 282A-MP-4181782".⁵

January 21, 2026 Interview With Victim C

19. On January 21, 2026, FBI investigating agents interviewed Victim C. Your Affiant reviewed a report of the interview conducted with Victim C. Victim C received their initial harassing phone call after Victim C's information was compromised and disclosed on the internet following the January 14, 2026 incident. The caller yelled Victim C's name and was swearing at Victim C. Thereafter, Victim C began receiving multiple harassing and threatening texts and phone calls, including the threatening text from the Subject Phone described above, and threats against his family members. Victim C explained that they had to leave their phone on silent and not pick up unknown numbers because of the volume of harassing calls

⁴ Victim C's full name and identity is known to Your Affiant.

⁵ The 282A number is an actual FBI case number.

and texts being received. At the time of the interview, Victim C was still receiving harassing voicemails and texts on a daily basis.

Victim D's Phone

20. Victim D is an FBI SA with the Minneapolis Field Office, who had received multiple threatening phone calls and text messages after the January 14, 2026 incident described above, and whose information was contained on some of the documents stolen from the two government-owned vehicles that were damaged and ransacked by the protestors.⁶

21. On January 18, 2026, at 8:54 am, Victim D received a text message from Subject Phone which stated, "Fuck you, [Victim D's full first and last name], you motherfucking traitorous piece of shit ice agent. Burn in hell pussy. We know who you are and where to find you now. Tick tock motherfucker.."

Victim E's Phone

22. Victim E is a Customs and Border Protection Officer and a FBI Task Force Officer (TFO) with the Minneapolis Field Office, who had received multiple threatening phone calls and text messages after the January 14, 2026 incident described above, and whose information was contained on some of the documents stolen from the two government-owned vehicles that were damaged and ransacked by the protestors.⁷

⁶ Victim D's full name and identity is known to Your Affiant.

⁷ Victim E's full name and identity is known to Your Affiant.

23. On January 18, 2026, at 8:53 am, Victim E received a text message from Subject Phone which stated, "Fuck you, [Victim E's full first and last name], you motherfucking traitorous piece of shit ice agent. Burn in hell pussy. We know who you are and where to find you now. Tick tock motherfucker.."

January 21, 2026 Interview With Victim E

24. On January 21, 2026, FBI investigating agents interviewed Victim E. Your Affiant reviewed a report of the interview conducted with Victim E. After Victim E received the threatening communication from the Subject Phone, Victim E checked the number in a CBP database and discovered the number was used by James Patrick LYONS (YOB 1971) in order to renew his passport in or about May 2025 and had listed an address in Murrieta, CA.

25. Based on the context of the above-described messages sent from the Subject Phone to Victims A through E, Your Affiant has probable cause to believe, based on his training and experience and the reasonable inferences from the facts contained in this Affidavit, that the person utilizing the Subject Phone to send the messages knew Victims A's through E's identity, and knew that the Victims were federal law enforcement officers. Your Affiant also has probable cause to believe that the person using the Subject Phone to send the messages knowingly and intentionally sent the communications for the purpose of issuing a threat, knowing that it would be perceived as a threat, or with reckless disregard that it would be perceived as a threat to injure the federal law enforcement officer victims.

Identification of James Patrick LYONS as the User of the Subject Phone

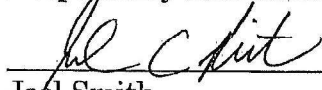
26. In addition to LYONS being identified in the CBP database as the user of the Subject Phone for a passport renewal, on January 24, 2026, Agents searched for the Subject Phone through a law enforcement database, which also identified LYONS (YOB 1971) as the registered user of that number. FBI databases list a residence address for LYONS at 24xxx Saradella Court, Murrieta, CA 92532.

27. On January 24, 2026, FBI Agents submitted an emergency disclosure request (EDR) for subscriber records to Verizon for location/subscriber data for the Subject Phone **951-365-9435**. Location data indicated the device was located in the vicinity of Murrieta, CA. Verizon also verified LYONS as the subscriber to the Subject Phone.

CONCLUSION

28. Based on the totality of the facts and circumstances within this Affidavit, the reasonable inferences therefrom, and Your Affiant's training, experience, and knowledge of the investigation, Your Affiant has probable cause to believe that on or about January 18, 2026, LYONS committed the Subject Offense.

Respectfully submitted,



Joel Smith
Special Agent, FBI

SUBSCRIBED and SWORN before me,
by reliable electronic means (via FaceTime and
box on USAfx) pursuant to Fed. R. Crim. P. 41(d)(3),
on January 25, 2026


DOUGLAS L. MICKO
United States Magistrate Judge
District of Minnesota