

AB:JKW

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

**TO BE FILED UNDER SEAL**

UNITED STATES OF AMERICA

- against -

THOMAS WELNICKI,

Defendant.

**AFFIDAVIT AND  
COMPLAINT IN SUPPORT  
OF APPLICATION FOR AN  
ARREST WARRANT**

(18 U.S.C. § 879(a))

Case No. 22-MJ-12

----- X

EASTERN DISTRICT OF NEW YORK, SS:

Matthew Bartolo, being duly sworn, deposes and states that he is a Special Agent with the United States Secret Service, duly appointed according to law and acting as such.

On or about and between September 24, 2021 and December 2, 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant THOMAS WELNICKI knowingly and willfully threatened to kill, kidnap, and inflict bodily harm upon a former President, to wit, Individual-1, an individual whose identity is known to the deponent.

(Title 18, United States Code, Section 879(a))

The source of your deponent’s information and the grounds for his belief are as follows:<sup>1</sup>

1. I have been a Special Agent in the United States Secret Service (“Secret Service”) and assigned to the New York Field Office for approximately two years and seven

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

months. I am a member of the New York Field Office Protective Intelligence Squad and investigate threats against the President of the United States, Vice President of the United States, members of the First and Second Families as well as former Presidents of the United States. I have also investigated cyber fraud cases as part of the Secret Service's New York Field Office's Electronic Crimes Task Force.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation. Unless specifically indicated, all conversations and statements described in the affidavit are set forth in sum and substance and in part.

3. WELNICKI is a resident of Rockaway Beach, New York.

4. During a voluntary interview on or about January 15, 2021, WELNICKI provided the number of his cell phone (the "Cell Phone") to law enforcement.

5. During a voluntary interview on or about July 21, 2020, WELNICKI told United States Capitol Police that "if [Individual-1]<sup>2</sup> loses the 2020 election and refused to step down," WELNICKI would "acquire weapons" and "take him down." WELNICKI bragged about how easy it was for him to acquire a firearm and added, "I don't want to hurt anyone, but I will stand up to fascism." At the end of the interview, WELNICKI stated, "I really hope that God takes [Individual-1] out."

6. On or about January 4, 2021, WELNICKI called the Secret Service's Long Island Resident Office from his Cell Phone and left two voicemail messages. In each

---

<sup>2</sup> Individual-1, an individual whose identity is known to the deponent, served as President of the United States from January 20, 2017 until January 20, 2021.

voicemail message, WELNICKI threatened to kill Individual-1 as well as 12 unnamed representatives and/or senators that he stated he believed “back[ed]” Individual-1. WELNICKI further claimed that there was a \$350,000 reward out to kill Individual-1 and the 12 unidentified members of Congress who assisted Individual-1. In the first voicemail, WELNICKI stated, “I am going to do anything I can to take out [Individual-1]. Oh yeah that’s a threat, come and arrest me. I will do anything I can to take out [Individual-1] and his 12 monkeys. . . . If I had the opportunity to do it in Manhattan that would be awesome. . . . Tomorrow [Individual-1] will be in Georgia, maybe I will.” In the second voicemail, WELNICKI stated, in substance, that he would aid and abet anyone that would shoot Individual-1 and any of the 12 unidentified members of Congress. WELNICKI then stated, “I’m going to Georgia tomorrow, I think [Individual-1] is going to be there. . . .”

7. On or about September 24, 2021, WELNICKI called the Secret Service’s New York Field Office from his Cell Phone and inquired about the Secret Service’s protection of former U.S. Presidents, including Individual-1, and their children, and also asked what weapons the Secret Service used. WELNICKI also asked about how he could arrange a protest at the residence of Individual-1 on Pearl Harbor Day. WELNICKI further stated that he has a legal right to own weapons and has guns and ammunition.

8. On or about November 8, 2021, WELNICKI called the Secret Service’s New York City Duty Desk at least three times from his Cell Phone. During each of these calls, he identified himself by name. During the first call, WELNICKI stated that he was a resident of New York City. He repeatedly referred to Individual-1 as “Hitler” and stated, “I will do everything I can to make sure [Individual-1] is dead.” During the second call, WELNICKI stated, “there is a contract out to kill [Individual-1].”

9. During a voluntary interview on November 9, 2021, WELNICKI admitted to law enforcement that he had called the Secret Service's New York City Duty Desk on the previous day.

10. On or about December 2, 2021, WELNICKI called the Secret Service's New York City Duty Desk from his Cell Phone. WELNICKI sought information regarding how to schedule a protest at the residence of Individual-1. He further stated, "the new Civil war could break out and taking up arms against the government is justified when ballots don't matter." He added that he used to own a .22 caliber firearm.

I request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based on my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving the defendant an opportunity to flee, destroy or tamper evidence, or change patterns of behavior. In addition, should the defendant learn of the investigation, there is a significant additional risk to the safety of former government officials.

WHEREFORE, your deponent respectfully requests an arrest warrant so that the defendant THOMAS WELNICKI may be dealt with according to law.

*Matthew Bartolo*

---

Matthew Bartolo  
Special Agent, United States Secret Service

Sworn to before me via telephone this  
7<sup>th</sup> day of January, 2022

*Lois Bloom*

---

THE HONORABLE LOIS BLOOM  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK