

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA )

v. )

JOSEPH FRANCIS MORELLI )

Case No. 3:22-MJ-112 (ML)

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 March 3, 2022 in the county of Broome in the Northern District of New York the defendant(s) violated:

Code Section
18 U.S.C. § 875(c)

Offense Description
Transmitting Interstate Threatening Communications

This criminal complaint is based on these facts:
See attached affidavit in support of Criminal Complaint.

[X] Continued on the attached sheet.

Handwritten signature of Gregory M. Yankow

Complainant's signature

Special Agent Gregory M. Yankow, FBI

Printed name and title

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

Date: March 15, 2022

Handwritten signature of Miroslav Lovric

Judge's signature

City and State: Binghamton, New York

Hon. Miroslav Lovric, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR NORTHERN DISTRICT OF NEW YORK

**UNITED STATES OF AMERICA**

**v.**

**JOSEPH FRANCIS MORELLI,**

**Defendant.**

Case No. 3:22-MJ-112 (ML)

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF  
A CRIMINAL COMPLAINT**

I, Gregory M. Yankow, 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 Joseph Francis MORELLI, the defendant, with violating Title 18, United States Code, Section 875(c), Transmitting Interstate Threatening Communications.

2. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2002. I am currently assigned to the Albany Division. I have previously been assigned to the Newark (New Jersey) Division, Aviation Operations, and FBI Headquarters. Since June 2020 I have been assigned to a criminal squad at the Ithaca (New York) Resident Agency. During the course of my career, I have worked on many different types of investigations. I have also received training and gained experience in interview and interrogation techniques, the execution of federal search warrants and seizures, and the identification and collection of electronic evidence. As a Special Agent of the Federal Bureau of Investigation ("FBI"), I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and make arrests for the offenses enumerated in Title 18 and other chapters of

the United States Code. As an FBI Special Agent, I am authorized to seek and execute federal arrest and search warrants for Title 18 criminal offenses and offenses enumerated in other chapters of the United States Code.

3. This affidavit is made in support of a criminal complaint charging Joseph Francis MORELLI with violating Title 18, United States Code, Section 875(c), which makes it a crime to transmit in interstate or foreign commerce a communication containing a threat to injure the person of another.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers, federal agents, and witnesses. This affidavit is intended to show merely that there is probable cause for the requested criminal complaint and does not set forth all my knowledge about this matter. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe Joseph Francis MORELLI, the defendant, has violated Title 18, United States Code, Section 875(c), Transmitting Interstate Threatening Communications.

#### **PROBABLE CAUSE**

5. The following information has been provided in part by the United States Capitol Police and the office of United States Representative Marjorie Taylor Greene (Georgia-14). Her office in Washington, D.C. is located in the Longworth House Office Building.

6. On March 3, 2022, at approximately at 11:11 P.M., a male subject who identified himself as Joseph Francis MORELLI, using phone number (607) 239-4XXX, called the Washington D.C. office of United States Congresswoman Marjorie Taylor Greene and left a threatening voicemail message, which was subsequently reported to United States Capitol Police

on March 7, 2022. In this voicemail, MORELLI threatened to harm Congresswoman Taylor Greene. More Specifically, the message at 11:11 P.M. stated:

"Yeah, I just don't think I can go on letting you, you know, cause hatred and poison to people. I really think I'm gonna have to cause you harm--physical harm. You're putting commercials where you blow up a car, and you just... I don't know if I can link you to anyone committing suicide, like a transgender person, directly to you. I'm gonna have to take your life into my own hands. Yeah, I would really, really caution you not to cause someone to harm someone else because of your evilness. You're just a horrible person. You know, you can file charges, and we can go to court. I can tell them what a cunt you are and how bad you are for humanity. You're a pile of shit, and if you keep up with this hatred and people get hurt, I'm gonna hurt you. Physically, I'm gonna harm you. Okay scum bag?"

7. A second voice mail message received at Representative Greene's Washington D.C. office on March 3, 2022 at 11:18 P.M. stated:

"My name is Joseph Morelli, M-O-R-E-L-L-I. I live in the Binghamton area of New York. My phone number is 607-239-4XXX. 'Majority,' whatever the hell your name is, redneck, you promote violence, and I think as a true patriot and humanitarian and human being, I think I'm gonna have to show you, to your face, right up front, what violence truly is, and I don't think you're gonna like it. You've got a big fucking mouth, and I'm gonna show you what violence is really about. Okay dummy? Hey man, I can have anyone to come to you. I can pay someone 500 bucks to take a baseball bat and crack your skull. These goofs can do 20 years standing on their head. Dougie Rxxxxs, Shane Rxxxxs, the late Morris Txxxxxr, another murderer from where I grew up. I'll get someone, scum bag. Keep spreading that hate, bitch. See what the fuck happens to you. You are going to get fucking physically hurt. Keep talking that shit, bitch."

8. These messages threatening to injure or kill Representative Greene, and others left by MORELLI, were reported to the United States Capitol Police, Threat Assessment Section, on March 4, 2022, who began an investigation in coordination with the FBI.

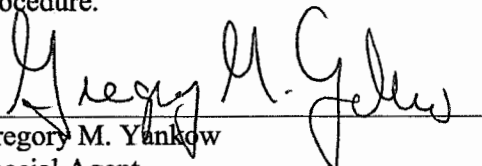
9. Records obtained from Charter Communications confirmed a landline telephone and voice over IP (VOIP) number (607) 239-4XXX subscribed to JOSEPH MORELLI, 118 Oak Hill Avenue, Apartment 1, Endicott, New York. Additional public records checks and local law enforcement information matched that telephone number to Joseph Francis MORELLI, 50, at his

residential address at 118 Oak Hill Avenue, Apartment 1, Endicott, New York, which is within the Northern District of New York.

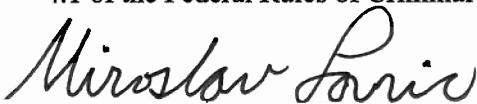
10. In total, MORELLI left seven (7) threatening voice mail messages for Congresswoman Taylor Greene at her Washington D.C. Congressional Office on March 3, 2022, and March 4, 2022. Additionally, these messages also threaten harm to law enforcement if they respond to the voice mail messages. These messages were all sent from (607) 239-4XXX by Joseph MORELLI in Endicott, New York, to the Congressional office of Representative Marjorie Taylor Greene in Washington D.C., and therefore were transmitted in interstate commerce.

11. Based on the foregoing, I respectfully submit there is probable cause to believe that Joseph Francis MORELLI did knowingly and willfully transmit in interstate commerce, that is using a telephone between the Northern District of New York and Washington D.C., a threat to injure the person of United States Congresswoman Marjorie Taylor Greene, in violation of Title 18, United States Code, Section 875(c). I respectfully request the Court authorize the filing of this complaint and issue an arrest warrant so that the defendant may be arrested and brought to court for further proceedings in accordance with the law.

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

  
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Gregory M. Yankow  
Special Agent  
Federal Bureau of Investigation

I, the Honorable Miroslav Lovric, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on March 15, 2022, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Miroslav Lovric  
U.S. Magistrate Judge