

STATE OF NEW YORK

COUNTY OF ERIE

VILLAGE COURT

VILLAGE of LANCASTER

Defendant: NA  
(Relationship to alleged victim)

Alleged Victim: NA  
(Relationship to defendant)

THE PEOPLE OF THE STATE OF NEW YORK

-- VS. --

Date of Birth

TYLER VOGEL

7/29/1997

Defendant(s)

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BE IT KNOWN THAT, by this FELONY COMPLAINT, THOMAS J JAMES  
as the Complainant herein, STATIONED at SP CLARENCE  
accuses the above mentioned Defendant(s), with having COMMITTED the FELONY  
of MAKE TERRORISTIC THREAT in violation of Section 490.20  
Subdivision \_\_\_\_\_ of the PENAL Law of the State of New York.  
That on or about 3/24/2024 at about 10:23 PM  
in the VILLAGE of LANCASTER, County of ERIE, the defendant(s)

*did intentionally, knowingly and unlawfully commit the felony of Making A Terroristic Threat. A person is guilty of making a terroristic threat when with intent to intimidate or coerce a civilian population, influence the policy of a unit of government by intimidation or coercion, or affect the conduct of a unit of government by murder, assassination or kidnapping, he or she threatens to commit or cause to be committed a specified offense and thereby causes a reasonable expectation or fear of the imminent commission of such offense. Making a terroristic threat is a class D felony.*

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*On the aforementioned date and time, the above defendant did send a text message threatening the New York State Attorney General with death and physical harm if she did not comply with his requests to cease action in a current case initiated by that office against Donald Trump. The defendant obtained the information for Attorney General Letitia James using a paid online background website and confirmed intentions to follow through with the threats were his demands not met.*

The above allegations of fact are made by the Complainant herein on DIRECT KNOWLEDGE

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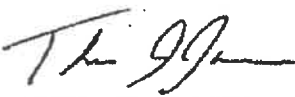
In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the State of New York punishable as a Class A Misdemeanor. (PL 210.45)

Affirmed under penalty of perjury

this 25<sup>TH</sup> day of MARCH, 2024

--OR--

Subscribes and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_

  
COMPLAINANT -

COURT COPY

STATE OF NEW YORK

COUNTY OF ERIE

VILLAGE COURT

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*On the aforementioned date and time, the above defendant did send a text message threatening death and physical harm to the phone number [REDACTED] a phone number he obtained via paid background website after a search for Judge Arthur Engoron. The threatening message was sent with intent to influence the Judge and the New York State Attorney General from proceeding forward with a judgement against Donald Trump due to recent litigation.*

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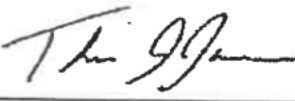
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Defendant(s)

BE IT KNOWN THAT, by this INFORMATION, THOMAS J JAMES,  
as the Complainant herein, STATIONED at SP CLARENCE,  
accuses the above mentioned Defendant(s), with having COMMITTED the MISDEMEANOR  
of AGGRAVATED HARASSMENT-2ND in violation of Section 240.30  
Subdivision \_\_\_\_\_ of the PENAL Law of the State of New York.

That on or about 03/24/2024 at about 10:23 PM  
in the VILLAGE of LANCASTER, County of ERIE, the defendant(s)

*did intentionally, knowingly and unlawfully commit the misdemeanor of Aggravated Harrassment-2nd:Telephone. A person is guilty of aggravated harassment in the second degree when, with intent to harass, annoy, threaten or alarm another person, he or she: 1. Either 2. Makes a telephone call, whether or not a conversation ensues, with no purpose of legitimate communication; 5. For the purposes of subdivision one of this section, "form of written communication" shall include, but not be limited to, a recording as defined in subdivision six of section 275.00 of this part. Aggravated harassment in the second degree is a class A misdemeanor.*

*On the aforementioned date and time, the above defendant did send a text message threatening death and physical harm to the phone number [REDACTED] phone number he obtained via paid background website after a search for Judge Arthur Engoron. The threatening message was sent with intent to influence the Judge and the New York State Attorney General from proceeding forward with a judgement against Donald Trump due to recent litigation.*

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