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5	UNITED STATES I	DISTRICT COURT
6	DISTRICT OF NEVADA	
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8	UNITED STATES OF AMERICA,	Magistrate No. 2:16-mj-443-GWF
9	Plaintiff	
10	vs.	COMPLAINT for violation of
11	MICHAEL STEVEN SANDFORD,	18 U.S.C. § 1752(a)(4) – Act of Violence on Restricted Grounds
12	Defendant	
13	BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned	
14	Complainant, being duly sworn, deposes and states:	
	COUNT ONE	
15	(Act of Violence on Restricted Grounds)	
16	On or about June 18th, 2016, in the state and Federal District of Nevada,	
17	MICHAEL STEVEN SANDFORD,	
18	the defendant herein, knowingly attempted to engage in an act of physical violence against Donald J.	
19	Trump in the Mystere Theatre in the Treasure Island Casino, Las Vegas, Nevada, a building where	
20	Donald J. Trump was receiving protection from the U.S. Secret Service as a result of a temporary	
21	visit, by attempting to seize a firearm from Las Vegas Metropolitan Police Department Officer for	
22	the purpose of engaging in physical violence against Donald J. Trump, all in violation of Title 18,	
23	United States Code, Section 1752(a)(4).	

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PROBABLE CAUSE AFFIDAVIT

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2	1. Your Complainant is a Special Agent with the United States Secret Service (Secret		
3	Service) and is currently assigned to the Las Vegas Field Office. Your Complainant has been		
4	employed with the Secret Service since 2011. Prior to becoming a Special Agent and being		
5	assigned to the Las Vegas Field Office, your Complainant worked in the United States Air Force		
6	Security Forces.		
a sainte a s	2. The information used to support this Complaint was derived from reports of		
7	information obtained from eye witnesses to the offenses described herein as well as investigations		
8	conducted by law enforcement related to the incident. This Complaint contains information		
9	necessary to support probable cause to believe that the criminal offenses described herein were		
10	committed by the defendant, MICHAEL STEVEN SANDFORD (SANDFORD), and is not		
11	intended to include each and every fact and matter observed by me or known to the Government.		
12	Moreover, to the extent that this Complaint contains statements by witnesses, those statements are		
13	set forth only in part and in substance and are intended to accurately convey the information, but		
14	not to be verbatim recitations.		
15	FACTS ESTABLISHING PROBABLE CAUSE		
16	3. On June 18, 2016, SANDFORD entered a political rally event under protection of the		
17	Secret Service located in the Mystere Theatre in the Treasure Island Casino for a political rally		
18	attended by Donald J. Trump (Trump), a major candidate for the office of U.S President who is		
19	under the protection of the Secret Service. The political rally had one public entrance which was		
20	posted with Secret Service Form 4088 posters bearing the Secret Service Star and stating,		
21	"ATTENTION: BY ENTERING THIS AREA, YOU ARE CONSENTING TO A SEARCH OF		
	YOUR PERSON AND BELONGINGS," which designated the building or grounds as restricted and		
22	under the protection of the Secret Service. Furthermore, this entrance was posted with Secret		
23	service Uniform Division Officers bearing clear Secret Service markings. Guests to this event were		
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processed through magnetometers prior to being allowed entry into the event in order to detect metallic weapons.

4. At the rally, uniformed Las Vegas Metropolitan Police Department (LVMPD) Officer
Ameel Jacob was stationed at the rally to assist in providing security. An individual later identified
as SANDFORD approached Officer Jacob, stating that he was seeking an autograph from Trump.
SANDFORD then attempted to seize the sidearm of Officer Jacob by grabbing the holster and
handle of the firearm with both hands in an attempt to remove the firearm from the holster.
SANDFORD was arrested and on his person was located a United Kingdom Driving License
identifying the subject as SANDFORD.

9 5. While Special Agent Swierkowski was asking for biographical information,
10 SANDFORD stated that he had been in the U.S. for approximately one and a half years.
11 SANDFORD lived in Hoboken, NJ upon coming to the U.S. and subsequently traveled to the
12 Ontario/San Bernardino, California area via his personal car (a black, 2007 BMW 328i).

6. SANDFORD told Special Agent Swierkowski he drove here from California on June
 16, 2016 to kill Trump. Sandford had seen in the news a few days prior that Trump was coming to
 Las Vegas to speak. SANDFORD then revealed that he made a conscious effort to come to Las
 Vegas to kill Trump.

7. SANDFORD said that he went to Battlefield Vegas gun range in Las Vegas on June
 17, 2016 to learn how to shoot a gun. SANDFORD claimed that this was the first time he had ever
 fired a gun. According to SANDFORD he fired 20 rounds from a 9mm Glock pistol for the purpose
 of learning how to use it.

8. SANDFORD claimed he targeted Officer Jacobs because he believed he saw the
 officer's holster in an unlocked position. SANDFORD reasoned it would be the easiest way to
 acquire a gun to shoot Trump.

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SANDFORD further stated that if he were on the street tomorrow, he would try this

1	again. Sandford claimed he had been planning to attempt to kill Trump for about a year but decided
2	to act on this occasion because he finally felt confident about trying it.
3	10. Special Agent Swierkowski presented SANDFORD with a Secret Service Miranda
4	Warning form. SANDFORD read the Miranda Warning form and signed it agreeing to speak with
5	us and waive his Miranda rights. I then conducted an interview of SANDFORD with Special Agent
6	Swierkowski present. When SANDFORD was asked why he attempted to grab Officer Jacob's
7	sidearm, SANDFORD replied, "To shoot and kill Trump." SANDFORD acknowledged that he
8	would likely only be able to fire one to two rounds and stated he was convinced he would be killed
9	by law enforcement during his attempt on Trump's life. When asked what he would have done had
10	he not made an attempt on Trump's life at this event, SANDFORD stated that he had booked tickets
11	for a Trump political rally in Phoenix, AZ and would try again there to kill Trump.
12	11. Upon completion of the interview I reviewed video footage of the incident provided
12	by Treasure Island's audio/visual technicians. The footage shows that at 11:35 a.m. (Pacific Standard Time) SANDFORD gets up from his seat at the event, approaches Officer Jacob, and
	attempts to grab his sidearm.
14	12. LVMPD Detectives Dave Kelly and Daniel New went to Battlefield Vegas gun range
15	and spoke with an employee named J.V. who provided shooting lessons to Sandford on June 17,
16	2016. J.V. recognized SANDFORD from his United Kingdom Driving License and stated that
17	SANDFORD did fire at his range.
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..... 13. Based on the foregoing facts and information, there is probable cause to believe that MICHAEL STEVEN SANDFORD attempted to committed an act of violence on restricted grounds in violation of 18 U.S.C. § 1752(a)(4). Special Agent Joseph L. Hall United Stated Secret Service SUBSCRIBED and SWORN to before me This 20 day of June, 2016. GEORGEFF. FOLLEY UNITED STATES MAGISTRATE JUDGE