

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America
v.
WILLIAM DAVENPORT DEFOOR

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Case No. 1:26-mj-00008

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 January 5, 2026 in the county of Hamilton in the Southern District of Ohio, the defendant(s) violated:

Table with 2 columns: Code Section and Offense Description. Rows include 18 U.S.C. §1361 (Depredation against US property), 18 U.S.C. §1752(a)(4) (Act of physical violence against person or property in restricted building or grounds), and 18 U.S.C. §111(a)(1) and (b) (Forcibly assaults, resists, opposes, impedes, intimidates, or interferes with any person in lawful execution of duties).

This criminal complaint is based on these facts:
SEE AFFIDAVIT

Continued on the attached sheet.

ghartsell

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Complainant's signature

Printed name and title

Sworn and subscribed to before me by reliable electronic means, specifically, FaceTime video conference, in accordance with Fed. R. Crim. P. 4.1.

Date: 1/5/2026

Stephanie K. Bowman
Judge's signature

City and state: Cincinnati, Ohio

Hon. Stephanie K. Bowman, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Gavin Hartsell, Assistant Special Agent in Charge, United States Secret Service, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am an Assistant Special Agent in Charge (ASAIC) of the Department of Homeland Security, United States Secret Service (USSS). I have been employed by the USSS since August 2006. I have gained experience through training at the Federal Law Enforcement Training Center, The USSS Training Center and continuous work as a Special Agent. I have participated in the preparation and execution of federal arrest and search warrants in my position as a Special Agent, including for federal violations involving matters of threats against persons lawfully protected by the USSS and for numerous financial crimes investigations. I am a Federal Law Enforcement Officer who is engaged in enforcing the criminal laws, including 18 U.S.C. § 1361, and § 111, among other offenses, and I am authorized by law to request an arrest warrant.

2. This Affidavit is submitted in support of a Criminal Complaint and Arrest Warrant for WILLIAM DAVENPORT DEFOOR (DEFOOR) for violations of 18 U.S.C. §1361 (Damage to Government Property), 18 U.S.C. §1752(a)(4) (Knowingly Engaging in Act of Violence Against Person or Property on Restricted Grounds), and 18 U.S.C. §111(a)(1) and (b) (Assaulting, Resisting or Impeding certain Officers or Employees).

3. The statements contained in this affidavit are based in part on information provided by U.S. Federal Law Enforcement Agents; written reports about this and other investigations that

I have received, directly or indirectly, from other law enforcement officers; information gathered from the service of administrative subpoenas; the results of physical surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts; and my experience, training and background as a Special Agent (SA). This Affidavit is being submitted for the limited purpose of securing an arrest warrant. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause to believe that DEFOOR violated 18 U.S.C. §1361 (Damage to Government Property), 18 U.S.C. §1752(a)(4) (Knowingly Engaging in Act of Violence Against Person or Property on Restricted Grounds), and 18 U.S.C. §111(a)(1) and (b) (Assaulting, Resisting or Impeding certain Officers or Employees).

STATUTORY AUTHORITY

4. This investigation concerns alleged violations of the following:
 - a. 18 U.S.C. §1361 – Whoever willfully injures or commits any depredation against any property of the United States, or of any department or agency thereof, or any property which has been or is being manufactured or constructed for the United States, or any department or agency thereof, or attempts to commit any of the foregoing offenses, shall be punished as follows: If the damage or attempted damage to such property exceeds the sum of \$1000, by a fine under this title or imprisonment for not more than ten years, or both; if the damage or attempted damage to such property does not exceed the sum of \$1000, by a fine under this title or imprisonment for not more than one year, or both.
 - b. 18 U.S.C. §1752(a)(4) – Whoever knowingly engages in any act of physical violence against any person or property in any restricted building or grounds ... or attempt or conspires to do so, shall be punished as provided in subsection (b).
 - c. 18 U.S.C. §111(a)(1) and (b) – Whoever forcibly assaults, resists, opposes, impedes, intimidates, or interferes with any person designated in section 1114 of this title while engaged in or on account of the performance of official duties ... shall be fined or imprisoned under this title; and (b) Enhanced Penalty – Whoever, in the commission of any acts described in subsection (a), uses deadly or

dangerous weapon or inflicts bodily injury shall be fined under this title or imprisoned not more than 20 years, or both.

FACTS SUPPORTING PROBABLE CAUSE

5. The USSS provides 24-hour Physical Security of a Protective Residence located at an undisclosed address in Cincinnati, Hamilton County, Ohio, within the Jurisdiction of the Southern District of Ohio. This Residence is the private home of a USSS Protectee, authorized full-time protection under 18 USC § 3056 for the Primary Protectee and all family members. The USSS has a contingent of Special Agents assigned to this residence for the purpose of mitigating threats to the property at any time and/or to the Protectees when they visit the residence. The most recent visit of the Protectees concluded at approximately 3:00 PM on January 4, 2026.

6. On January 5, 2026, at approximately 12:15 AM, a person later identified as DEFOOR was observed by USSS Agents running westbound along the front fence line of the Protected Residence. DEFOOR breached the property line at the driveway and attempted to break the driver's side window of a US Government Unmarked Police Vehicle blocking the driveway entrance. DEFOOR was armed with an unknown (at the time) impact weapon. Special Agent Grace Garrett was posted in the driveway of the protected residence and immediately observed DEFOOR'S actions. SA Garrett identified herself as "POLICE" and "SECRET SERVICE" with loud clear commands to stop and drop the weapon. SA Garrett later reported she believed DEFOOR to have been armed with a hatchet at first observation.

7. DEFOOR refused to obey law enforcement lawful commands and advanced toward SA Garrett with the impact weapon still in hand. SA Garrett later reported fearing for her safety and advised she acquired a tactical position to further engage DEFOOR with commands to stop.

SA Garrett reported giving repeated verbal commands identifying herself as “POLICE” and “SECRET SERVICE,” while ordering DEFOOR to drop the weapon. DEFOOR ignored all commands and began to use a hammer to break glass windows across the front of the Protected Residence. DEFOOR broke multiple glass panels in three large, historic windows. DEFOOR also caused damage to enhanced security assets owned by the US Government that were part of the security system of each window.

8. SA Garrett continued to give lawful orders and instructions to DEFOOR while he was using the hammer to attack the windows. SA Garrett feared for her safety in approaching DEFOOR armed with a hammer and violently causing property damage to the protected residence.

9. DEFOOR eventually dropped the hammer on the ground in front of the front porch of the protected residence and fled south and east on the public sidewalk. Senior Special Agent Thomas Doyle and Special Agent Thomas Bell had already made notification to the Cincinnati Police Department via a 911 call and police radio. SSA Doyle was responding to intercept DEFOOR and made contact with him on the city sidewalk just east of the protected residence. Cincinnati Police also arrived at this time and DEFOOR was taken into custody.

10. Upon further inspection, damage was noted on the driver’s side window of the US Government Owned Unmarked Police Vehicle consisting of marks and abrasions to the glass. DEFOOR struck the window three times with the hammer. Further inspection also revealed 14 individual panels of glass fully broken across three larger windows on the front of the protected residence. In addition, DEFOOR’S hammer strikes also caused damage to the enhanced security assets on each window owned by the US Government and valued over \$28,000.

CONCLUSION

11. Based on the foregoing, there is probable cause to believe that the federal criminal statutes cited herein have been violated by WILLIAM DAVENPORT DEFOOR and there is probable cause to support his arrest for violations of 18 U.S.C. § 1361 (Damage to Government Property) 18 U.S.C. §1752(a)(4), (Knowingly Engaging in Act of Violence Against Person or Property on Restricted Grounds), and 18 U.S.C. §111(a)(1) and (b) (Assaulting, resisting, or impeding certain officers or employees). Thus, I respectfully request this court authorize a criminal complaint and arrest warrant for DEFOOR.

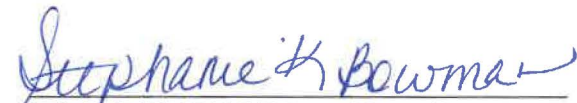
Respectfully submitted,

ghartsell

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Gavin Hartsell
Assistant Special Agent in Charge
United States Secret Service
Cincinnati Field Office

Subscribed and sworn to before me by reliable electronic means, specifically, FaceTime video conference, in accordance with Fed. R. Crim. P. 4.1, on January 5, 2026.



HON. STEPHANIE K. BOWMAN
UNITED STATES MAGISTRATE JUDGE