

**STATEMENT OF FACTS**

I am an Officer in the Uniformed Division of the United States Secret Service (USSS). I make this affidavit in support of a criminal complaint because there is probable cause to believe that Jacob Samuel Winkler committed a violation of 18 U.S.C. § 39A in the District of Columbia.

This affidavit is presented for the sole purpose of establishing probable cause. It does not represent the totality of facts known to me and other investigators involved in this case. This affidavit is based on my observations and my investigation, which included speaking with or reading reports written by or reviewing body worn camera footage from other investigators who have personal knowledge of the events described.

Based on my investigation, I learned the following: Arresting Officer Diego Santiago, badge #3354, was in full police uniform, operating a U.S. Secret Service Uniformed Division Bicycle and assigned to secure the flight path for Marine One (Presidential Helicopter). Marine One had recently landed on the South Grounds of the White House and a crowd was gathering near the White House. Officer Santiago was on patrol near the intersection of 17<sup>th</sup> Street and Constitution Avenue NW, Washington, DC in preparation for President Donald Trump's departure on Marine One from the South Grounds of the White House. The flight path of Marine One was southbound from the South Grounds and crossed over The Ellipse, Constitution Avenue NW, and then the Washington Monument grounds, all of which are in the District of Columbia within the jurisdiction of the United States. Large crowds of

pedestrians often form in the area to view the arrival and departure of Marine One due to the sizeable Secret Service presence and the President's public schedule.

Marine One was airborne from the South Grounds with President Trump on-board and oriented southbound toward the Washington Monument grounds. Officer Santiago was on patrol in the secure area of Constitution Avenue NW, monitoring for threats to the aircraft. Officer Santiago noticed the defendant, Jacob Samuel Winkler (hereinafter D1), walking westbound on the south sidewalk of Constitution Avenue NW from the area of 210 16<sup>th</sup> Street NW towards 17<sup>th</sup> Street NW. Officer Santiago observed D1 was shirtless, talking to himself and being loud. Due to the lack of light on the sidewalk, Officer Santiago shined his flashlight at S-1 for further observation. S-1 then pointed and shined a red laser beam at Officer Santiago's face, apparently in retaliation. The red laser beam hit Officer Santiago's eyes and briefly disoriented him. At this time, Marine One flew at a relatively low height and directly above Officer Santiago and D1's location. Marine One was close enough that the rotor noise was loud, and the aircraft appeared large overhead. Officer Santiago approached D1 after being flashed in the face with the red laser. Upon approach, D1 looked up, oriented the same red laser pointer at the direction of Marine One and activated the red laser beam. From Officer Santiago 's training and experience, Officer Santiago immediately identified D1's action as a danger to Marine One and everyone on-board. D1's conduct posed a risk of flash blindness and pilot disorientation, especially during low-level flight near other helicopters (U.S. Park Police, U.S. Marine Corps) and the Washington Monument. This placed Marine One at risk of an airborne collision. Officer Santiago quickly detained D1 and removed the red laser pointer from his

hand. D1 was then placed into handcuffs. After he was handcuffed, D1 got on his knees and started saying things like, "I should apologize to Donald Trump," and "I apologize to Donald Trump." The defendant repeated this action several times.

In addition, investigators recovered the following evidence: A red laser pointer was recovered from D1, as well as a small fixed-blade knife, approximately three inches long.

Post-arrest, D1 was advised of his Miranda rights, which he waived. During the interview, S-1 admitted to pointing the red laser pointer at Marine One. D1 said he did not know he could not point the laser at Marine One; he said he points the laser at all kinds of things, such as stop signs.

Based on the facts contained in this affidavit, there is probable cause to believe the following: On or about September 20, 2025, in the District of Columbia, the defendant, Jacob Samuel Winkler, did knowingly aim the beam of a laser pointer at an aircraft in the special aircraft jurisdiction of the United States, or at the flight path of such an aircraft in violation of 18 U.S.C. § 39A.



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OFFICER DIEGO SANTIAGO  
United States Secret Service

*Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on September 22, 2025.*

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THE HONORABLE ZIA M. FARUQUI  
U.S. MAGISTRATE JUDGE