

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	CASE NO. 1:25-cr-138
Plaintiff,	:	JUDGE McFarland
v.	:	<u>INDICTMENT</u>
SAMUEL SAXON,	:	18 U.S.C. § 1001(a)(2)
Defendant.	:	
	:	
	:	

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**THE GRAND JURY CHARGES:**

Introduction:

1. At times relevant to this Indictment:
  - a. The Defendant, **SAMUEL SAXON**, was Assistant Field Office Director for the Cincinnati Sub Office of U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations.
  - b. The Department of Homeland Security, Office of Inspector General (DHS OIG), was the lead Internal Affairs component of the Department of Homeland Security. The duties of the DHS OIG included the investigation of fraud, waste, abuse, and other criminal misconduct involving DHS programs, personnel, and funds.
  - c. Individual 1 was **SAMUEL SAXON**'s significant other.
2. On December 5, 2025, **SAMUEL SAXON** grabbed Individual 1 by the neck in the hallway of an apartment building and then dragged Individual 1 into an apartment. A neighbor saw this happen and called 911.

3. On December 6, 2025, a Special Agent with DHS OIG interviewed **SAMUEL SAXON**. Before asking **SAXON** any questions, the Special Agent identified herself as working for the DHS OIG.

4. During the interview, the Special Agent advised **SAMUEL SAXON** that it was a crime to lie to a federal agent. Shortly thereafter, **SAXON** told the Special Agent, in sum and substance, that he had not interacted in person with Individual 1 on the day of the 911 call described in this Indictment. **SAXON** claimed, in sum and substance, that he had only interacted with Individual 1 via phone that day.

**COUNT 1**

**(False Statement or Representation to an Agency or Officer of the United States)**

5. The factual allegations contained in paragraphs 1 through 4 above are incorporated herein as if set forth in full.

6. On or about December 6, 2025, the defendant, **SAMUEL SAXON**, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating and representing, in sum and substance, to a Special Agent with the Department of Homeland Security, Office of Inspector General, that he had not interacted in person with Individual 1 on the day of the 911 call described in this Indictment, and that he had only interacted with Individual 1 via phone. These statements and representations were false because, as **SAXON** then and there knew, on the day of the 911 call described in this Indictment, **SAXON** had interacted in person with Individual 1 in the

hallway of an apartment building, where he grabbed Individual 1 by the neck, as well as within an apartment.

**All in violation of Title 18, United States Code, Section 1001(a)(2).**

A TRUE BILL.

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GRAND JURY FOREPERSON

DOMINICK S. GERACE II  
UNITED STATES ATTORNEY

Julie D. Garcia  
JULIE D. GARCIA / ASHLEY N. BRUCATO  
ASSISTANT UNITED STATES ATTORNEYS