

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Scott Sandusky, Special Agent with the Federal Bureau of Investigation, Department of Justice, being duly sworn, deposes and states under penalty of perjury that the following is true to the best of my information, knowledge and belief.

BACKGROUND:

1. Your affiant is a Special Agent with the Federal Bureau of Investigation (FBI) and has been since 2012. Your affiant is currently assigned to assist as an FBI Airport Liaison Agent at Denver International Airport (DEN) and investigates violations of federal law that occur at the airport, as well as crimes that occur in the Special Aircraft Jurisdiction of the United States. In this regard, the following information was developed by your affiant and other agents of the FBI and/or Denver Police Department, in connection with an FBI investigation into a flight disturbance on Spirit Airlines flight NK 185 involving Jahmir Ahmmad Williams, date of birth 02/16/1998.
2. The statements contained in this Affidavit are based in part on information provided to me by DPD officers, either directly or indirectly through their reports or affidavits, surveillance conducted by law enforcement officers, and information provided by witnesses. Your Affiant also relies on his experience, training, and background as a Special Agent with the FBI in evaluating this information, and on my own work on this case.
3. Because this affidavit is being submitted for the limited purpose of supporting a complaint and obtaining an arrest warrant, I have not included every fact known to me concerning this investigation but have set forth only the facts I believe are necessary to establish probable cause for the complaint and arrest warrant.
4. Based on the information below, probable cause exists to believe that the defendant, Jahmir Ahmmad Williams, while within the special aircraft jurisdiction of the United States, assaulted and intimidated a flight attendant of the aircraft, and thereby interfered and attempted to interfere with such flight attendant's duties, all in violation of Title 49, United States Code, Sections 46504 and 46501.

STATEMENT OF FACTS:

5. On March 24, 2021, at approximately 7:34 p.m., I was advised of a flight diverted to DEN due to a disturbance aboard Spirit Airlines Flight NK 185, which occurred while the flight was en route from Cleveland International Airport to Los Angeles International Airport. Thereafter, I responded to gate C48 at DEN where I spoke to officers from the Denver Police Department (DPD), and reviewed statements written by flight crew members and passenger witnesses. Your affiant also conducted follow-up interviews. From these sources of information, I learned of the events described below.

6. This flight originated from Cleveland on March 24, 2021 with a scheduled destination of Los Angeles. While en route, Spirit Airlines flight attendant, herein identified by the initials C.M., noticed an African American male with yellow dreadlocks, and who was shirtless, trying to open the rear exit door of the airplane, identified as door L2. This person was later identified by Denver Police as Jahmir Ahmmad Williams (Williams), date of birth 02/16/1998, who had been seated in 19C. C.M. saw another flight attendant, herein identified as D.O., trying to pull Williams away from the door, but Williams resisted. Williams then pulled the pin and tried to pull the armed lever on the door. C.M. then ran to the front of the aircraft to notify the cockpit. Two additional flight attendants, herein identified as J.M. and R.B., restrained Williams after a physical struggle and with help from other passengers.
7. Spirit Airlines flight attendant D.O., was the flight attendant in the back of the airplane. D.O. saw Williams coming out of the rear bathroom without wearing a shirt and shoes, and saw William go straight to the airplane's rear exit door, identified as door L2. D.O. saw Williams pull the door's lever up, while the aircraft was in flight and approximately two hours before the flight's planned landing in Los Angeles. D.O. yelled at Williams to get away from the door, but Williams did not listen. D.O., assisted by two other flight attendants, tried to get Williams away from the aircraft's door, but was not able to do so. D.O. advised that five people were ultimately needed to pull Williams away from the door. Once Williams was moved away from the door by flight attendants and passengers, his hands and feet were restrained and he was moved to the back row of the aircraft with the help of two passengers, before the landing at Denver International Airport where Williams was turned over to the Denver Police Department.
8. Spirit Airlines flight attendant, herein identified by the initials J.M., saw an African American male, later identified as Williams, trying to open the L2 door and people trying to stop Williams. J.M. then ran to the front of the aircraft to obtain handcuffs. J.M. then returned to the rear of the aircraft where Williams was restrained. J.M. then handcuffed Williams' hands, and Williams was seated in the last row of the aircraft until landing at Denver International Airport. J.M. thought Williams was trying to hurt him. J.M. advised he had bruises on his arms and small cuts from the altercation with Williams.
9. Denver Airport Medic 187, herein identified by the initials J.K., responded to Denver Airport Gate C48. J.K. advised that passengers exited the plane, and J.K. and multiple Denver Police Department officers boarded the plane and made contact with Williams. J.K. observed that Williams was restrained. Williams did not initially respond to J.K. or the DPD officers. Williams then suddenly and violently hit his head into the wall. Due to Williams' agitation, combativeness and self-harm, Williams was sedated with 5mg of "midazolam IM". During J.K.'s medical assessment of Williams, Williams spoke in several complete sentences and advised that he was allergic to several medications. J.K. also attended to two of three flight attendants and passengers that were injured in the course of restraining Williams. J.K. provided care to an off-duty police officer, herein identified by the initials S.C.; S.C. advised J.K. he was head butted 2-3 times in the face by Williams and J.K.'s lip was bleeding and

appeared to be swollen. J.K. also provided care to J.M., who was injured while restraining Williams. J.M. had several superficial abrasions and lacerations to his forearms.

10. After reviewing and obtaining the above statements, I interviewed Williams. After being advised of his Miranda rights, Williams verbally agreed to speak to me. In summary, Williams advised he was flying from Cleveland to Los Angeles and seated in seat 19C. He advised that he wanted to kill everyone, including himself, on the aircraft. Williams stated that he wanted the interviewing agents to take Williams to jail. Williams also stated that he wanted to kill the interviewing agents and advised he would kill people if he was let out of jail.
11. The incident as described herein occurred while Spirit Airlines flight NK 185 was operating in the special aircraft jurisdiction of the United States. I was advised that once Williams began his acts of trying to open the aircraft door and struggling with the flight attendants and passengers, the aircraft's pilot was notified and the flight diverted to DEN based on safety concerns.

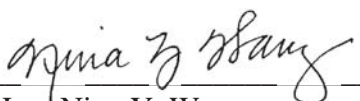
CONCLUSION:

Based upon the above information, probable cause exists to believe that on March 24, 2021, Jahmir Ahmmad Williams violated Title 49, United States Code, Section 46504 - Interference with Flight Crew Members and Attendants.

I declare under the penalty of perjury the foregoing information is true and correct to the best of my knowledge.

s/ Scott Sandusky
Special Agent Scott Sandusky
Federal Bureau of Investigation

Sworn to before me this 25th day of March 2021.



Hon. Nina Y. Wang
United States Magistrate Judge

Affidavit reviewed and submitted by Patricia Davies, Assistant United States Attorney.