

STATEMENT OF FACTS

On August 10, 2025, at approximately 11 PM, Metro Transit Police (“MTP”) Detective Daina Henry, Badge # D948, and members of United States Customs and Border Protection (“CBP”) were patrolling the area of 2001 14th Street NW in Washington, DC. Detective Henry observed an individual (herein referenced as Sean Charles DUNN) begin to shout at CBP Agent Gregory Lairmore (herein referenced as V-1) who was, at the time of the offense, an employee of the United States and acting in performance of his official duties.

DUNN stood within inches of V-1, pointed his finger in V-1’s face, and yelled, “Fuck you! You fucking fascists! Why are you here? I don’t want you in my city!” DUNN continued his conduct for several minutes before crossing the street and continuing to yell obscenities at V-1.

At approximately 11:06 PM, DUNN approached V-1 and threw a sandwich at him, striking V-1 in the chest. An Instagram video recorded by an observer captured the incident. The video depicts DUNN screaming at V-1 within inches of his face for several seconds before winding his arm back and forcefully throwing a sub-style sandwich at V-1.



Figures 1 and 2 – DUNN holding the sub-style sandwich, circled in red, in his hand, winding his arm back, and forcefully throwing the sandwich at V-1, striking him in the chest.

DUNN attempted to flee on foot but was apprehended. While being processed at Metropolitan Police Department's Third District, DUNN told MTP Officer Gurkaranjot Thandi, "I did it. I threw a sandwich."

As such, your affiant submits that probable cause exists to charge Sean Charles Dunn with violation of 18 U.S.C. § 111(a)(1) (**Assaulting, resisting, or impeding certain officers and employees of the United States**).

A rectangular box containing a handwritten signature in black ink. The signature appears to be "D. Henry" written in a cursive style.

Detective Daina Henry
Metro Transit Police

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 13th day of August 2025.

HONORABLE MOXILA A. UPADHYAYA
UNITED STATES MAGISTRATE JUDGE