

UNITED STATES DISTRICT COURT

Western DISTRICT OF North Carolina

UNITED STATES OF AMERICA
V.
Jerry Michael BLANCHARD

CRIMINAL COMPLAINT

Case Number: 3:08-mj-

164

FILED
CHARLOTTE, NC
AUG 1 2008
U.S. DISTRICT COURT
WESTERN DISTRICT OF NC

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 7/15/08 to 7/28/08 in Mecklenburg County, in the Western District of North Carolina defendant(s) did,

(Track Statutory Language of Offense)

knowingly and willfully threaten to kill, kidnap, and inflict bodily harm upon U.S. Senator Barack Obama, a major candidate for the office of President of the United States,

in violation of Title 18 United States Code, Section(s) 879

I further state that I am a(n) Secret Service Special Agent and that this complaint is based on the following facts:

Official Title

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part of this complaint: [X] Yes [] No

Signature of Complainant (Handwritten signature)

Sean Leddy, Special Agent
Printed Name of Complainant

Sworn to before me and signed in my presence,

8/1/2008
Date

at Charlotte North Carolina
City State

The Honorable David C. Keesler U.S. Magistrate
Name of Judge Title of Judge

Signature of Judge (Handwritten signature)

UNDER SEAL

AFFIDAVIT

I, Sean J. Leddy, being duly sworn, depose and say:

1. I am a Special Agent with the United States Secret Service (USSS) assigned to the Charlotte Field Office. I have been employed in this capacity since February of 2003. As a Special Agent, I have been involved with numerous criminal investigations to include credit card fraud, counterfeiting of United States Currency and other securities, Bank Fraud, Counterfeit Check Fraud, Threats to USSS Protectees, and various other crimes.
2. I have participated in the investigation as related in this affidavit. As a result of my participation in this investigation and information provided by other law enforcement officers, as well as civilian witnesses, I am familiar with all aspects of this investigation. On the basis of this familiarity, and on the basis of the other information that I have reviewed and determined to be reliable, it is alleged that there is probable cause to believe that the defendant, Jerry Michael BLANCHARD, did commit federal felony offenses, to wit, threats against a major candidate for the office of President of the United States, in violation of Title 18, United States Code, Section 879. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the arrest of the defendant identified herein, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish the requisite foundation for a probable cause finding.
3. On 07/15/08, a concerned citizen (hereinafter "CW-1") contacted the USSS Charlotte Field Office and reported that while he and an associate (hereinafter "CW-2") were eating

breakfast at the Waffle House located on Pineville-Matthews Rd., Charlotte, NC, they were

approached by an individual who identified himself as Jerry BLANCHARD. BLANCHARD asked if they had met before because CW-2 looked familiar. A conversation began between the three and the issue of U.S. Senator Barack Obama came up.

4. During this conversation BLANCHARD made the following statements in regards to Senator Obama: "I'm worth \$50 million dollars, I have a plane and can get a jet...Obama and his wife are never going to make it into the White House...he needs to be taken out and I can do it in a heartbeat and I might anyway...that man will never know what hit him...I hate that man with a passion...I just may do that, I've got the money and the clout to do that..." CW-1 heard BLANCHARD make a statement about his intention to purchase a .40 caliber Ruger pistol from Hyatt Gun Shop in Charlotte.

5. During their conversation, BLANCHARD also told CW-1 and CW-2 that he was a Certified Public Accountant (CPA). Prior to departing the Waffle House, CW-1 asked BLANCHARD for his name and telephone number under the guise that CW-1 was looking for a new CPA and might want to hire BLANCHARD. BLANCHARD provided CW-1 with his name and cell phone number. On that same date, this affiant showed a photo of Jerry M. BLANCHARD to CW-1 and CW-2, and both positively identified BLANCHARD as the same individual who made the threatening statements.

6. Continuing on 07/15/08, this affiant located and interviewed BLANCHARD. BLANCHARD denied making any threatening statements about Senator Obama. BLANCHARD stated that he was considering purchasing a .40 caliber Ruger from Hyatt Gun Shop, but that this was only for self defense purposes. The subject also stated that he believes Senator Obama is the "Anti-Christ" who will cause the Armageddon prophesized

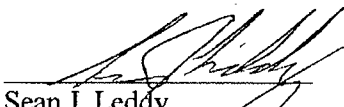
in the Bible's Book of Revelation. During this interview, I advised the subject that regardless of his religious beliefs, or political opinions, it is a violation of federal law to threaten Senator Obama. The subject acknowledged that he understood and denied making any threats to harm the Senator.

7. On 07/28/08, an employee (hereinafter "CW-3") of the Crown Plaza Hotel in Charlotte, NC, contacted the USSS Charlotte Field Office to report threatening statements he heard made by a subject in the restroom of his hotel. CW-3 was interviewed by this affiant and stated that at about 8:45AM he entered the lobby restroom and overheard a man on his cell phone stating "I'll get a .40 cal Ruger and a .50 cal sniper rifle and take care of it myself. I can get a \$3,000 laser scope that will let me take the center out of a quarter from 2 miles away. Somebody's got to do it." He then heard the man say "we both know that Obama is the Anti-Christ."
8. CW-3 stated that he waited in the lobby to see the man who he'd heard on the phone. He stated that the man exited the restroom and stayed in the lobby on the phone for 15 to 20 minutes. CW-3 stated that one of his employees remembered the subject from a July 4th, 2008 party at the hotel where they had to throw him out for being intoxicated. The employee remembered the man's last name was BLANCHARD.
9. CW-3 stated that he approached the subject and asked if he could help him. After a brief conversation the subject left the hotel. CW-3 stated that shortly after this conversation the subject approached him outside the hotel and asked to speak to him. During the ensuing conversation, the subject told CW-3, "I have an application for a .40 caliber Ruger and a .50 caliber sniper rifle with Larry Hyatt. I will get a \$3,000 laser scope for that rifle and I can take the center out of a quarter from 2 miles away." The subject then said "I believe Obama

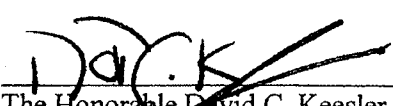
is the Anti-Christ and if he gets elected we have a problem.” The subject then talked about Senator Obama planning to outlaw the ownership of firearms and told CW-3 about a \$50 million lawsuit he has filed against the Federal Government. CW-3 identified a photograph of the subject as the same individual he heard make the threatening statements.

10. I have conducted interviews with several former work colleagues and other individuals with personal connections with Mr. BLANCHARD who have confirmed that he has developed a serious alcohol abuse problem, and that he has demonstrated uncharacteristic and unusual behavior that they believe may stem from possible mental health problems resulting from recent serious head injuries.
11. Senator Obama is a major candidate for the office of President of the United States.
12. This affiant finds that the information provided by witnesses, and other individuals, to be accurate, and has corroborated much of this information by reviewing various documents including criminal background checks and open source databases.

I swear that the information contained within this affidavit is true to the best of my knowledge and belief.


Sean J. Leddy
Special Agent, USSS

Sworn and subscribed before me this 1st day of August 2008 in Charlotte, North Carolina.


The Honorable David C. Keesler
United States Magistrate Judge