

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.
Cody Page Carter Connell
Daniel Page Adams

Case: 1:21-mj-00081
Assigned To : Faruqui, Zia M.
Assign. Date : 1/15/2021
Description: Complaint w/ Arrest Warrant

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of in the
District of Columbia, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. 111 (Assaulting a Federal Officer), 18 U.S.C. 231(a)(3) (Obstructing Law Enforcement), 18 U.S.C. 1752(a)(1)&(2) (Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority), and 40 U.S.C. 5104(e)(2)(D)(E)&(G) (Violent Entry and Disorderly Conduct on Capitol Grounds).

This criminal complaint is based on these facts:

See attached statement of facts.

Continued on the attached sheet.

Handwritten signature of Michael Sahadi

Complainant's signature

Michael Sahadi, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by Telephone (specify reliable electronic means).

Date: 01/15/2020

Handwritten signature of Judge Zia M. Faruqui



2021.01.15
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Judge's signature

City and state: Washington, DC

Magistrate Judge Zia M. Faruqui

Printed name and title

STATEMENT OF FACTS

I am employed as a Special Agent of the Federal Bureau of Investigation (FBI) and have been employed by the FBI since 2018. Currently, I am assigned to a squad that investigates Counterintelligence matters as part of the FBI Washington Field Office. The focus of my Counterintelligence efforts has been foreign intelligence activities. My squad is based at the Washington Field Office. As a Special Agent, I am authorized to investigate violations of laws of the United States and am authorized to execute warrants issued under the authority of the United States. My duties with the FBI include but are not limited to the investigation of counterintelligence matters.

The United States Capitol (the Capitol), which is located at First Street, SE, in Washington, D.C., is secured 24 hours a day by United States Capitol Police (Capitol Police). Restrictions around the Capitol include permanent and temporary security barriers and posts manned by Capitol Police. Only authorized people with appropriate identification are allowed access inside the Capitol. On January 6, 2021, the exterior plaza of the Capitol was closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the Capitol. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President of the United States Michael R. Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Pence present and presiding over the Senate, a large crowd gathered outside of the Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the Capitol building, and Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

Between 1:00 and 2:00 p.m., certain individuals in the crowd forced their way through, up, and over the barricades and Capitol Police officers, and the crowd advanced to the exterior façade of the building. The crowd was not lawfully authorized to enter or remain in the building and, prior to entering the building, no members of the crowd submitted to security screenings or weapons checks by Capitol Police Officers or other authorized security officials.

At such time, the certification proceedings were still underway, and the exterior doors and windows of the Capitol were locked or otherwise secured. Capitol Police officers attempted to maintain order and keep the crowd from entering the Capitol; however, shortly after 2:00 p.m., individuals in the crowd forced entry into the Capitol, including by breaking windows and by assaulting members of the Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m. members of the House and Senate, including Vice President Pence serving as the President of the Senate, were instructed to—and did—evacuate the chambers. Accordingly, all proceedings of the United States Congress, including the joint session, were effectively suspended until shortly after 8:00 p.m. the same day.

In light of the dangerous circumstances caused by the unlawful entry to the Capitol, including the danger posed by individuals who had entered the Capitol without any security screening or weapons check, Congressional proceedings could not resume until after every unauthorized occupant had left the Capitol, and law enforcement could confirm the building had been secured. The proceedings resumed at approximately 8:00 p.m. after the building had been secured. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the session resumed.

During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the Capitol building without authority to be there.

On January 7, 2021, an unknown individual provided law enforcement with information regarding a subject, “CODY CONNELL,” who claimed to have breached the Capitol on January 6. That individual provided a screenshot of what appears to be a Facebook exchange between CONNELL and another individual, in which CONNELL states, “I have more videos of us breaching the Capitol but not gonna post them. We will be back and it will be a lot worse than yesterday!” That screenshot is provided below in Figure One:



Figure One

The public Facebook profile picture for CONNELL is below in Figure Two. Law enforcement believes the identity of this individual is CODY PAGE CARTER CONNELL. A search of Louisiana's Department of Motor Vehicles returned CONNELL's February 2019 driver's license photograph, depicted below in Figure Three. By comparing Figure Two to Figure Three, your affiant reasonably believes that the individual who posted the above Facebook messages about breaching the Capitol is CODY PAGE CARTER CONNELL.



Figure Two



Figure Three

Additional social media research illustrates CONNELL's plans to travel from Louisiana to Washington, D.C. on January 6, 2021. On January 5, for example, CONNELL reposted a message stating, "Join President Donald J. Trump at the Save America March" and listing the event details for January 6, 2021. CONNELL added a message to this post saying, "Definitely gonna be an experience." Later that night at about 12:26 a.m. on January 6, CONNELL posted on Facebook a screen shot of what appears to be a Google maps picture of the Washington, D.C. area with a pin dropped in the center of Washington. CONNELL added a message with flexing-arm emojis saying, "gonna be right there in the middle of it."

At about 11:43 a.m. on January 6, CONNELL posted to his public profile page a two-minute and fifty-eight second video of CONNELL and another individual law enforcement believes to be CONNELL's cousin, DANIEL PAGE ADAMS, walking in what appears to be Washington, D.C., with the Washington Monument in the foreground. At about the fifteen-second mark, CONNELL says, "We here" and flashes the camera to his face and ADAMS's face. CONNELL is the bearded individual with a dark-colored hooded sweatshirt and a gray hat with markings on the front bottom-left, depicted in Figure Four. ADAMS is the next individual shown in the video with a mullet hairstyle, camouflage jacket, purple shirt, and blue multi-colored hat, depicted in Figure Five.



Figure Four



Figure Five

Finally, social media information revealed that CONNELL and ADAMS posed for a photograph in Washington, D.C. with the same clothing as in the aforementioned video. In the photograph, CONNELL appears to be the bearded individual in the center-right, with the same dark-colored hooded sweatshirt and gray hat with markings seen in Figure Four, and distinctive tattoos on his hands. ADAMS appears to be the individual in the center-left with the same mullet hairstyle, camouflage jacket, purple shirt, and blue multi-colored hat seen in Figure Five. The social media photograph is below in Figure Six, with CONNELL's face and tattoos identified by red ovals:



Figure Six

Law enforcement confirmed the identity of ADAMS in the above-referenced videos and photographs by conducting a search of Texas's Department of Motor Vehicles. That search returned ADAMS's driver's license photograph, depicted below in Figure Seven. By comparing the below photograph to Figures Five and Six, your affiant reasonably believes that the individual who traveled and breached the Capitol with CONNELL is DANIEL PAGE ADAMS.



Figure Seven

According to one witness familiar with both CONNELL and ADAMS, CONNELL created videos and photographs apparently taken with a mobile device and distributed to others via social media on January 6, showing himself and ADAMS on the Capitol grounds. This witness provided the photographs and videos to law enforcement and identified CONNELL and ADAMS. In one twelve-second video, CONNELL wrote “They tear gassing us.” The video shows CONNELL and ADAMS surrounded by other rioters and covering their faces as if to shield themselves from tear gas, all while standing under what appears to be the temporary fixture connected to the Capitol building on January 6. In Figure Eight below, CONNELL appears to be wearing the same dark-colored hoodie, gray hat with markings, and hand tattoos (marked with red ovals) as in Figures Four and Six. Also in Figure Eight, CONNELL’s cousin is standing behind CONNELL and appears to be wearing the same mullet hairstyle, camouflage jacket, and blue-patterned hat as in Figures Five and Six. Because of the face, clothing, and location matches between CONNELL’s personal Facebook post and the witness’s video provided to law enforcement, your affiant has reason to believe the subjects in both are CONNELL and ADAMS. In Figure Nine below, the screenshot of the video displays the surroundings after CONNELL flipped the camera around, and your affiant recognizes those surroundings to be the Capitol stairs.



Figure Eight



Figure Nine

Law enforcement also reviewed additional social media information connected to CONNELL that appears to be a cellphone video taken either by CONNELL or ADAMS. The video depicts ADAMS at the front of a crowd on the Capitol grounds, pushing toward a line of United States Capitol Police officers standing guard. At the beginning of the video, ADAMS repeatedly asks to those around him, "Let's go. Are you ready to push?" ADAMS is directly in front of a line of Capitol Police officers who are holding protective shields up between themselves and ADAMS. At this point, ADAMS starts yelling, "let's go, let's go, let's go!" and he and others appear to sprint up the Capitol steps, chasing the officers who are now repositioning themselves at the top of the stairs. ADAMS then engages in a direct struggle with law enforcement officers who are attempting to prevent ADAMS and others from breaking the line again. ADAMS continuously shouts, "come on, let's go, let's go, come on, let's go," in an apparent effort to encourage others to keep launching forward toward the officers and the Capitol building. The video then shows ADAMS physically engaging with another set of officers at the top of the steps. The video ends with a loud thud and ADAMS holding his head and uttering an expletive. Figure Ten, below, depicts ADAMS's view as shown in the video, just before he led the crowd of rioters to surge forward against the depicted officers and their protective shields. Figure Eleven depicts ADAMS holding his head and looking into the camera at the end of the apparent altercation.



Figure Ten



Figure Eleven

According to social media records, CONNELL appears to have described the January 6 events detailed above in a conversation with another individual on January 7, 2021. CONNELL stated “4 of us breached the cops blockade and us same 4 breached the Capitol.” After apparently sending a video to the same individual, CONNELL explained, “That’s my cousin. When we stormed the cops there was 8 of them and 4 of us so he got clubbed and shot with rubber bullet. But we pushed the cops against the wall, they dropped all their gear and left. That’s when we went to doors of Capitol building and breached it.” The other individual responded, “Yall boys something serious lol it lookin like a civil war yet?” CONNELL answered: “It’s gonna come to it.”

Your affiant believes CONNELL may intend to return to Washington, D.C. sometime during the week of January 18, 2021. According to a witness, CONNELL has communicated with at least two other individuals in Texas about purchasing long-rifle firearms, ammunition, and body armor to bring with them. According to the witness, CONNELL explained that he was not returning to Louisiana unless he was in a body bag. Your affiant understood that to mean CONNELL intended to travel to Washington D.C. to cause violence that may result in the end of his life.

Based on the foregoing, your affiant submits there is probable cause to believe that both CODY PAGE CARTER CONNELL and DANIEL PAGE ADAMS violated federal laws.

Your affiant submits that there is probable cause to believe that CODY PAGE CARTER CONNELL violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do so; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; or attempt or conspire to do so. For purposes of Section 1752 of Title 18, a “restricted building” includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Finally, your affiant submits there is also probable cause to believe that CODY PAGE CARTER CONNELL violated 40 U.S.C. § 5104(e)(2), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; (E) obstruct, or impede passage through or within, the Grounds or any of the Capitol Buildings; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.

In addition, your affiant submits there is probable cause to believe that DANIEL PAGE ADAMS violated 18 U.S.C. § 111(a), which makes it unlawful to forcibly assault, resist, oppose,

impede, intimidate, or interfere with any person designated in section 1114 of this title while engaged in or on account of the performance of official duties. For purposes of section 111 of Title 18, United States Capitol Police Officers constitute persons designated in section 1114 of Title 18.

Your affiant submits there is probable cause to believe that DANIEL PAGE ADAMS violated 18 U.S.C. § 231(a)(3), which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of Section 231 of Title 18, a federally protected function means any function, operation, or action carried out, under the laws of the United States, by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Joint Session of Congress where the Senate and House count Electoral College votes.

Your affiant submits that there is also probable cause to believe that DANIEL PAGE ADAMS violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do so; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; or attempt or conspire to do so. For purposes of Section 1752 of Title 18, a “restricted building” includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Finally, your affiant submits there is also probable cause to believe that DANIEL PAGE ADAMS violated 40 U.S.C. § 5104(e)(2), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; (E) obstruct, or impede passage through or within, the Grounds or any of the Capitol Buildings; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.



SPECIAL AGENT MICHAEL SAHADI, JR.
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone, this 15th day of January 2021.



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UNITED STATES MAGISTRATE JUDGE