

AO 442 (Rev. 01/09) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
District of Columbia

United States of America
v.
JESSICA MARIE WATKINS

Case No.

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Jessica Marie Watkins

who is accused of an offense or violation based on the following document filed with the court:

- Indictment
- Superseding Indictment
- Information
- Superseding Information
- Complaint
- Probation Violation Petition
- Supervised Release Violation Petition
- Violation Notice
- Order of the Court

This offense is briefly described as follows:

- 18 U.S.C. § 1752(a) (Restricted Building or Grounds)
- 40 U.S.C. § 5104(e)(2) (Violent Entry or Disorderly Conduct)
- 18 U.S.C. § 1512(c)(2) (Obstruction of an Official Proceeding)

Date: 01/16/2021

 2021.01.16
15:16:28 -05'00'

Issuing officer's signature

City and state: Washington, D.C.


Zia M. Faruqui, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) 1-16-2021, and the person was arrested on (date) 1-18-2021
at (city and state) urbana, Ohio.

Date: 1-18-2021


Arresting officer's signature

Special Agent, Justin T. Eller
Printed name and title

UNITED STATES DISTRICT COURT

FILED
RICHARD W. NAGEL
CLERK OF COURT

for the

District of Columbia

3:21-mj-23

1/19/21

United States of America

v.

Jessica Marie Watkins,
Donovan Ray Crowl,
Thomas Edward Caldwell,

Case: 1:21-mj-00119
Assigned To : Faruqui, Zia M.
Assign. Date : 1/19/2021
Description: Complaint w/ Arrest Warrant

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. DAYTON

Defendant(s)

AMENDED 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. § 371 (Conspiracy), 18 U.S.C. § 372 (Conspiracy to Impede or Injure Officer Without Lawful Authority), 18 U.S.C. § 1361 (Destruction of Government Property), 18 U.S.C. § 1512(c)(2) (Obstruction of an Official Proceeding), 18 U.S.C. § 1752(a) (Restricted Building or Grounds), 40 U.S.C. § 5104(e)(2) (Violent Entry and Disorderly Conduct on Capitol Grounds).

This criminal complaint is based on these facts:

See attached affidavit, which is incorporated herein by reference.

Continued on the attached sheet.

Handwritten signature of Michael M. Palian Jr.

Complainant's signature

Michael M. Palian Jr., Special Agent, 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: 01/19/2021

Handwritten signature of Zia M. Faruqui

2021.01.19
12:58:31 -05'00'

Judge's signature

City and state: Washington, D.C.

ZIA M. FARUQUI U.S. MAGISTRATE JUDGE

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case: 1:21-mj-00119
	:	Assigned To : Faruqi, Zia M.
	:	Assign. Date : 1/19/2021
v.	:	Description: Complaint w/ Arrest Warrant
	:	VIOLATIONS:
THOMAS EDWARD CALDWELL,	:	
	:	18 U.S.C. § 371
DONOVAN RAY CROWL, and	:	(Conspiracy)
	:	
JESSICA MARIE WATKINS,	:	18 U.S.C. § 372
	:	(Conspiracy to Impede or Injure Officer)
Defendants.	:	
	:	18 U.S.C. § 1361
	:	(Destruction of Government Property)
	:	
	:	18 U.S.C. § 1512(c)(2)
	:	(Obstruction of an Official Proceeding)
	:	
	:	18 U.S.C. § 1752(a)
	:	(Restricted Building or Grounds)
	:	
	:	40 U.S.C. § 5104(e)(2)
	:	(Violent Entry or Disorderly Conduct)
	:	

AFFIDAVIT IN SUPPORT OF AMENDED CRIMINAL COMPLAINT

I, Michael M. Palian Jr., being first duly sworn, hereby depose and state as follows:

PURPOSE OF AFFIDAVIT

1. This Affidavit is submitted in support of an Amended Criminal Complaint charging THOMAS EDWARD CALDWELL, DONOVAN RAY CROWL, and JESSICA MARIE WATKINS with violations of 18 U.S.C. §§ 371, 372, 1361, 1512(c)(2), 1752(a), and 40 U.S.C. § 5104(e)(2) (hereinafter, "Subject Offenses"). This Amended Criminal Complaint is intended to amend, or supersede, the Criminal Complaints filed in each individual's case on January 16-17, 2021. This Affidavit sets forth additional evidence establishing probable cause that CALDWELL, CROWL, and WATKINS conspired together, and with others known and unknown, to obstruct the

United States Congress' affirmation of the Electoral College vote regarding the results of the 2020 U.S. Presidential Election, and that they committed other related federal crimes in furtherance of that purpose, as set forth below.

2. I respectfully submit that this Affidavit establishes probable cause to believe that CALDWELL, CROWL, and WATKINS:

- a. Knowingly and willfully conspired together and with others whose identities are known and unknown to law enforcement at this time to commit an offense against the United States, in violation of 18 U.S.C. § 371, that is, to corruptly obstruct, influence, or impede an official proceeding in violation of 18 U.S.C. § 1512(c)(2); and
- b. Conspired together and with others whose identities are known and unknown to law enforcement at this time to prevent, by force, intimidation, or threat, officers of the United States from discharging their duties; to injure them on account of the lawful discharge of the duties of their offices; and to injure their property so as to interrupt, hinder, or impede them in the discharge of their official duties, in violation of 18 U.S.C. § 372; and
- c. Attempted to willfully injure or commit depredation against any property of the United States, in violation of 18 U.S.C. § 1361; and
- d. Corruptly obstructed, influenced, and impeded an official proceeding, in violation of 18 U.S.C. § 1512(c)(2); and
- e. Entered and remained in any restricted building and grounds without lawful authority, and knowingly, and with intent to impede or disrupt the orderly conduct of Government business and official functions, engaged in disorderly and disruptive conduct, in violation of 18 U.S.C. § 1752(a); and
- f. Willfully and knowingly engaged in disorderly and disruptive conduct, at any place in the Grounds and in any of the Capitol Buildings with the intent to impede, disrupt, and disturb the orderly conduct of a session of Congress or either House of Congress, and the orderly conduct in that building of any deliberations of either House of Congress, in violation of 40 U.S.C. § 5104(e)(2).

BACKGROUND OF AFFIANT

3. I am a Special Agent with the FBI and have been so employed since February 2003.

As a Special Agent with the FBI, I am empowered by law to conduct investigations, make arrests,

and execute and serve search and arrest warrants for offenses enumerated in Title 21 and Title 18 of the United States Code. I have a Ph.D in bio-organic chemistry, and have also received training and gained experience in a variety of criminal laws and procedures, including those involving drug distribution, white collar crime and crimes of violence. Through my training, education and experience, I have become familiar with the manner in which criminal activity is carried out, and the efforts of persons involved in such activity to avoid detection by law enforcement. In addition to my regular duties, I am currently tasked with investigating criminal activity that occurred in and around the U.S. Capitol grounds on January 6, 2021.

4. Unless otherwise stated, the information in this Affidavit is either personally known to me, has been provided to me by other individuals, or is based on a review of various documents, records, and reports. Because this Affidavit is submitted for the limited purpose of establishing probable cause, it does not contain every fact known by me or the United States. The dates listed in this Affidavit should be read as “on or about” dates.

BACKGROUND

The Incursion at the U.S. Capitol on January 6, 2021

5. The U.S. Capitol, which is located in the District of Columbia, is secured 24 hours a day by U.S. Capitol Police. The Capitol Police maintain permanent and temporary barriers to restrict access to the Capitol exterior, and only authorized individuals with appropriate identification are allowed inside the Capitol building.

6. On January 6, 2021, at approximately 1:00 p.m., a Joint Session of the U.S. House of Representatives and the U.S. Senate convened in the Capitol building to affirm the Electoral College vote in the 2020 Presidential Election. U.S. Vice President Michael R. Pence, in his

constitutional duty as President of the Senate, presided over the Joint Session. The Capitol's exterior plaza was closed to the public.

7. At approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve an objection. Vice President Pence adjourned to the Senate to preside over that chamber's proceeding. As the House and Senate proceedings ensued inside the Capitol, certain individuals in the crowd forced their way through, up, and over Capitol Police barricades intended to protect the building's exterior. The crowd thereafter advanced to the building's exterior façade. Members of the Capitol Police attempted to maintain order and stop the crowd from entering the Capitol building, to which the doors and windows were locked or otherwise secured. Nonetheless, shortly after 2:00 p.m., crowd members forced entry into the Capitol building, including by breaking windows and assaulting Capitol Police officers, while others in the crowd encouraged and assisted those acts. The crowd was not lawfully authorized to enter or remain in the Capitol building, and no crowd member submitted to security screenings or weapons checks by Capitol Police or other authorized security officials.

8. Shortly thereafter, at approximately 2:20 p.m., members of the House and Senate, including Vice President Pence, were evacuated from the chambers. The Joint Session and all proceedings of the U.S. Congress were halted while Capitol Police and other law enforcement worked to restore order and clear the Capitol of the unlawful occupants.

9. At approximately 8:00 p.m., approximately six hours after the crowd breached the Capitol, the Joint Session resumed, again with Vice President Pence presiding. The Vice President remained in the U.S. Capitol from the time he was evacuated from the Senate chamber until the time the Joint Session resumed.

10. In the course of these events, approximately 81 members of the U.S. Capitol Police and 58 members of the Metropolitan Police Department were assaulted. Moreover, according to the Architect of the Capitol, the office responsible for the Capitol's operations and care, the building and grounds suffered more than \$1,000 in damage. The damage included broken windows, doors, and light fixtures; graffiti; and residue of various pepper sprays, tear gas, and fire extinguishers deployed by members of the crowd and by Capitol Police officers attempting to restore order.

11. National news coverage of the aforementioned events featured video footage, which appeared to be captured on the mobile devices of persons present on the scene and which depicted evidence of numerous violations of local and federal law, including violent attacks on law enforcement officers, vandalism, and significant destruction of the U.S. Capitol building.

The Oath Keepers

12. Law enforcement and news media organizations observed that members of a paramilitary organization known as the Oath Keepers were among the individuals and groups who forcibly entered the U.S. Capitol on January 6, 2021. The Oath Keepers are a large but loosely organized collection of militia who believe that the federal government has been coopted by a shadowy conspiracy that is trying to strip American citizens of their rights. Though the Oath Keepers will accept anyone as members, what differentiates them from other anti-government groups is their explicit focus on recruiting current and former military, law enforcement and first responder personnel. The organization's name alludes to the oath sworn by members of the military and police to defend the Constitution "from all enemies, foreign and domestic."

Thomas Caldwell, Donovan Crowl, and Jessica Watkins

13. THOMAS CALDWELL is a 65-year-old resident of Clarke County, Virginia. CALDWELL is believed to have a leadership role within the Oath Keepers. As described more

fully herein, CALDWELL planned with DONOVAN CROWL, JESSICA WATKINS, and others known and unknown, to forcibly storm the U.S. Capitol.

14. DONOVAN CROWL is a 50-year-old resident of Champaign County, Ohio. CROWL is a member of the Ohio State Regular Militia. The Ohio State Regular Militia is a local militia organization, many of whose members form a dues-paying subset of the Oath Keepers. As described more fully herein, CROWL planned with CALDWELL, JESSICA WATKINS, and others known and unknown, to forcibly storm the U.S. Capitol.

15. JESSICA WATKINS is a 38-year-old resident of Champaign County, Ohio. At the top of WATKINS' social media account page on Parler, a social networking service, WATKINS states that she is "C.O. [Commanding Officer] of the Ohio State Regular Militia." As described more fully herein, WATKINS planned with CALDWELL, CROWL, and others both known and unknown, to forcibly storm the U.S. Capitol on January 6, 2021.

STATEMENT OF FACTS SUPPORTING PROBABLE CAUSE

16. As described below, evidence uncovered in the course of the investigation demonstrates that not only did CALDWELL, CROWL, WATKINS, and others conspire to forcibly storm the U.S. Capitol on January 6, 2021—they communicated with one another in advance of the incursion and planned their attack.

17. I have reviewed footage of the January 6, 2021, incursion of the U.S. Capitol, including a video that, at the approximate 3-minute-and-8-second mark, shows eight to ten individuals in paramilitary equipment aggressively approaching an entrance to the Capitol building.¹ These individuals, who are wearing helmets, reinforced vests, and clothing with Oath

¹ <https://www.youtube.com/watch?v=b76KfHB0QO8&feature=youtu.be> (last accessed January 14, 2021).

Keeper paraphernalia, can be seen moving in an organized and practiced fashion and forcing their way to the front of the crowd gathered around a door to the U.S. Capitol.

PICTURE 1



18. A close-up view of the badges on the vest of one of these individuals, seen just under the Oath Keepers emblem on his shirt, displays the Oath Keepers motto, “Not On Our Watch.”

PICTURE 2



19. Based on the foregoing observations of the video, and information gained in the course of my investigation, I believe the organized group of individuals marching to the door of the U.S. Capitol in the video above are members of the Oath Keepers.

Jessica Watkins

20. In the video referenced above, at the approximate 3-hour-and-20-second mark, the footage shows the uncovered face of an individual in the group of Oath Keepers.

PICTURE 3



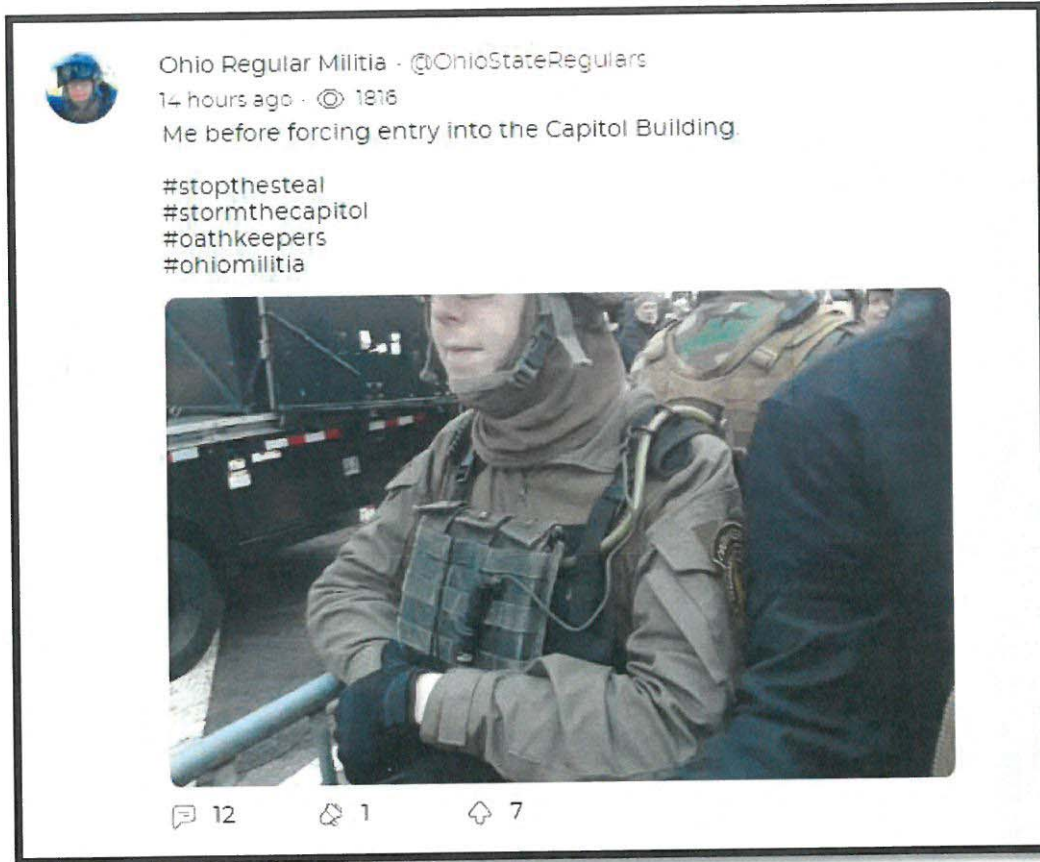
21. I have identified this individual to be JESSICA WATKINS by comparing the footage in the video above to WATKINS' DMV photograph and other photographs of WATKINS.

22. In addition, in various social media posts, WATKINS has confirmed that on January 6, 2021, she entered the U.S. Capitol by force.

23. For instance, on January 6, 2021, Watkins posted to Parler a photograph of herself in the same Oath Keepers uniform in which she appears in Picture 3, alongside the statement: "Me before forcing entry into the Capitol Building. #stopthesteal² #stormthecapitol #oathkeepers #ohiomilitia."

² I am aware from public reporting after the 2020 Presidential Election that the social media hashtag #stopthesteal was used by people who believed, essentially, that the election was influenced by fraud, and who wanted to stop the Electoral College results from being certified by the Congress.

PICTURE 4



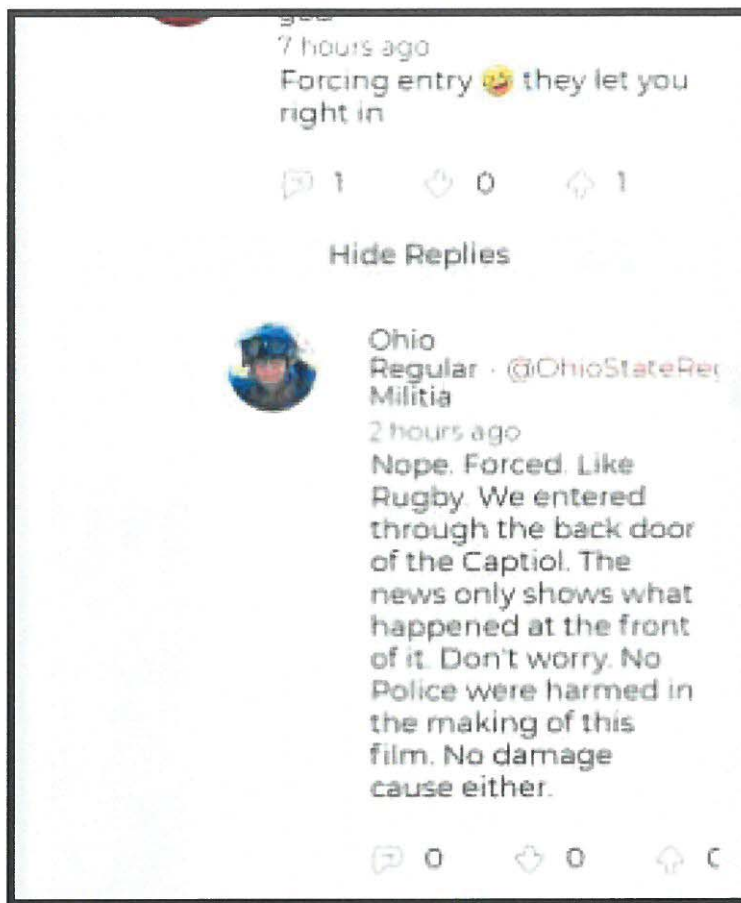
24. Also on Parler, on January 6, 2021, WATKINS posted another video from that day and wrote, "Yeah. We stormed the Capitol today. Teargassed, the whole, 9. Pushed our way into the Rotunda. Made it into the Senate even. The news is lying (even Fox) about the Historical Events we created today."

PICTURE 5



25. In another Parler post, WATKINS responded to a comment challenging whether she actually forced entry by confirming, "Nope. Forced. Like Rugby. We entered through the back door of the Capitol."

PICTURE 6



26. Furthermore, WATKINS gave a newspaper interview in which she further confirmed her membership in the Oath Keepers and the fact that she had participated in the incursion of the U.S. Capitol on January 6, and suggested that she had clashed with U.S. Capitol Police. On January 13, 2021, the Ohio Capital Journal published an article entitled, *Ohio Bartender and Her 'Militia' Drove to D.C. to Join the Capitol Breach.*³ WATKINS is quoted in the article as saying, "To me, it was the most beautiful thing I ever saw until we started hearing glass smash. That's when we knew things had gotten really bad." WATKINS also states, "We never smashed

³ <https://www.citybeat.com/news/blog/21147932/ohio-bartender-and-her-militia-drove-to-dc-to-join-the-capitol-breach> (last accessed January 16, 2021).

anything, stole anything, burned anything, and truthfully we were very respectful with Capitol Hill PD until they attacked us. Then we stood our ground and drew the line.”

27. In addition, the FBI has obtained an audio recording of Zello⁴ communications between WATKINS and other suspected Oath Keepers during the Capitol incursion. During the recorded transmission—believed to be among WATKINS and other Oath Keepers on a Zello channel called “Stop the Steal J6”—WATKINS had the following exchanges (among others) which are approximately transcribed:

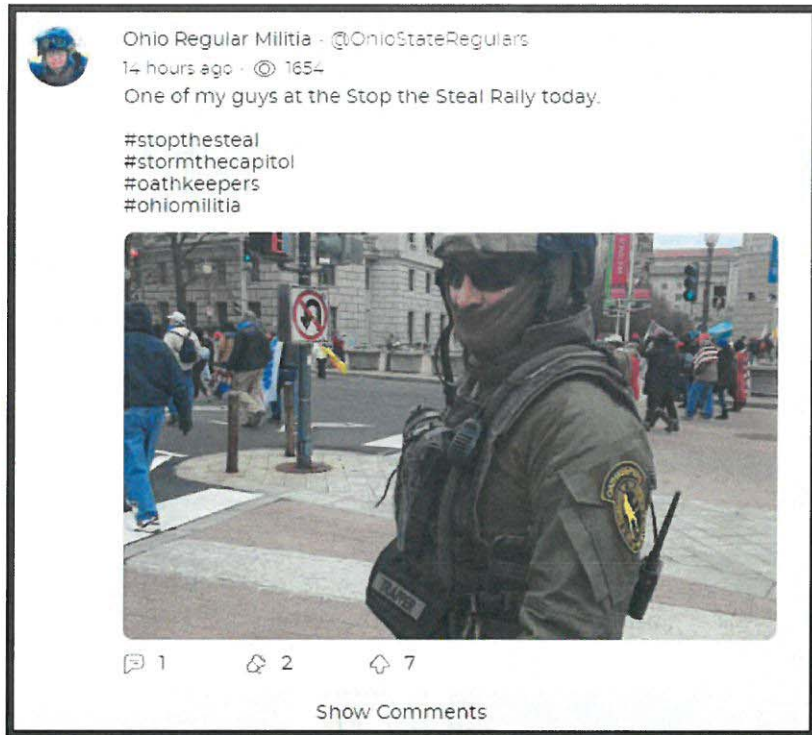
- a. At the approximate 5-minute mark, the voice believed to be WATKINS reports, “We have a good group. We have about 30-40 of us. We are sticking together and sticking to the plan.” An unknown male responds, “We’ll see you soon, Jess. Airborne.”
- b. At the approximate 7-minute-and-44-second mark, an unknown male states, “You are executing citizen’s arrest. Arrest this assembly, we have probable cause for acts of treason, election fraud.” The voice believed to be WATKINS responds, “We are in the mezzanine. We are in the main dome right now. We are rocking it. They are throwing grenades, they are fricking shooting people with paint balls. But we are in here.” An unknown male responds to WATKINS, telling her to be safe, and states, “Get it, Jess. Do your fucking thing. This is what we fucking [unintelligible] up for. Everything we fucking trained for.”

Donovan Crowl

28. In a Parler post on January 6, 2021, WATKINS shared a picture of an individual in paramilitary gear, wearing an Oath Keeper patch on his arm, and wrote, “One of my guys at the Stop the Steal Rally today. #stopthesteal #stormthecapitol #oathkeepers #ohiomilitia.” I have confirmed that the individual whom WATKINS identified “one of my guys” in the picture is DONOVAN CROWL, by comparing pictures of him at the U.S. Capitol on January 6, 2021, to DMV records and the Ohio State Regular Militia Parler page.

⁴ Zello is a push-to-talk app that operates like a walkie-talkie on a cellular telephone. The Zello app may, depending on a user’s settings, store recordings and other information about the user’s communications on the user’s phone.

PICTURE 7



29. On January 14, 2021, the New Yorker magazine published an interview with CROWL entitled, *A Former Marine Stormed the Capitol as Part of a Far-Right Militia*.⁵ The article notes that CROWL was photographed in the Capitol Rotunda on January 6 and references him as the individual depicted in the video screenshot in Picture 8 below.

⁵ <https://www.newyorker.com/news/news-desk/a-former-marine-stormed-the-capitol-as-part-of-a-far-right-militia> (last accessed January 16, 2021).

PICTURE 8



30. I have also reviewed photographs of CROWL taken inside the Capitol Rotunda on January 6, 2021, including one from the New Yorker article that identifies CROWL as the individual wearing dark glasses with other Oath Keepers. In this photograph, depicted below in Picture 9, CROWL (red circle) is wearing a green reinforced vest with a label reading “Trapper” partially visible (yellow circle). I note that, in Picture 7 above, from WATKINS’ Parler page, CROWL is wearing the same “Trapper” patch.

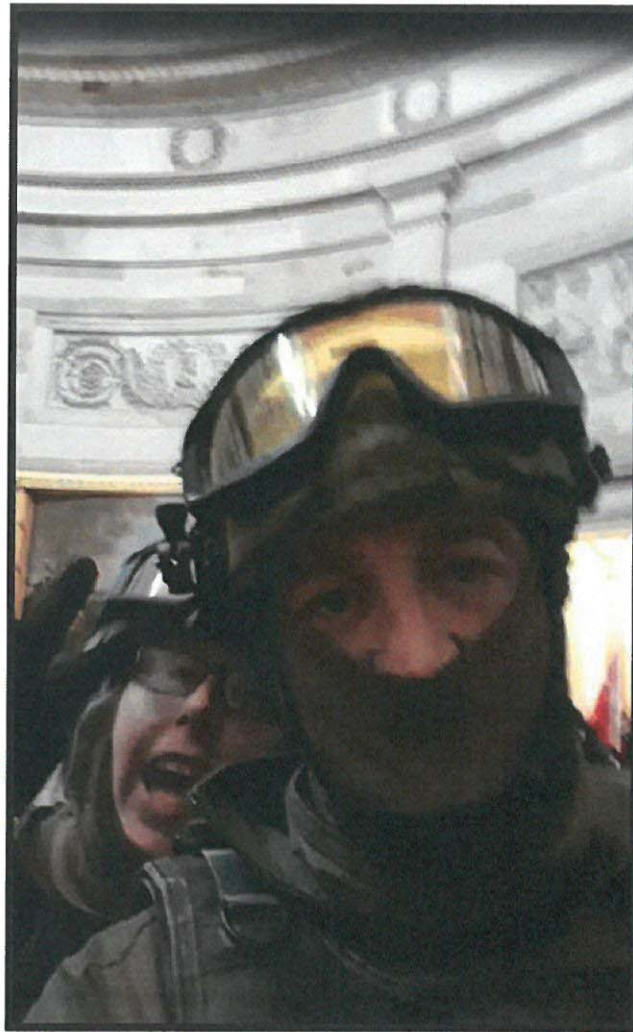
PICTURE 9



31. Furthermore, in his interview with the New Yorker, CROWL identified himself as a member of both the Oath Keepers and the Ohio State Regular Militia, and admitted that he joined these groups in the January 6 Capitol incursion. CROWL—who admitted to the reporter that he had been drinking before the interview—stated that he entered the U.S. Capitol on January 6, claiming he had gone to Washington, D.C., to “do security” for “V.I.P.s” whom he declined to name. CROWL also stated that his intentions had been peaceful, that he had never been violent, and that “we protected the fucking Capitol Hill police.” He declined to substantiate the claim during the interview. CROWL at the same time admitted during this interview that he “expelled three fucking people” whom he said had been injured. He further elaborated about “patriots [who] dragged this fucking maggot off the wall and started beating his ass.”

32. Finally, I have viewed a video from the collection of videos amassed by ProPublica.⁶ One video depicts WATKINS and CROWL together in the Capitol Rotunda. CROWL says, “We took on the Capitol! We overran the Capitol!” WATKINS exclaims, “We’re in the fucking Capitol, CROWL! WATKINS and CROWL turn the camera around for a video selfie as they do so.

PICTURE 10



⁶ <https://projects.propublica.org/parler-capitol-videos/> (last accessed January 19, 2021).

Thomas Caldwell

33. CALDWELL also participated in the incursion of the U.S. Capitol on January 6, 2021, as shown by records collected from his Facebook Account.

34. On January 6, 2021, at approximately 7:47 p.m., CALDWELL transmitted a Facebook message of a video that appears to have been taken near the U.S. Capitol. A screenshot from the video is below:

PICTURE 11



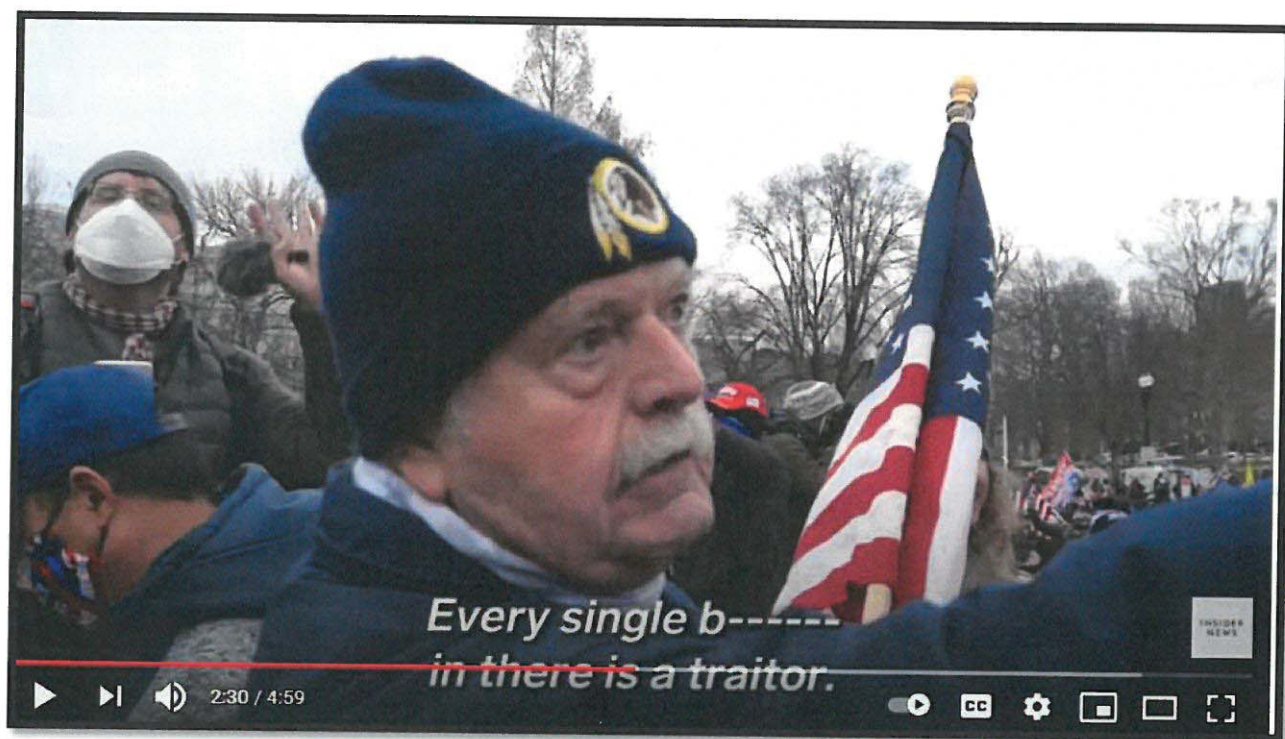
35. Approximately two minutes later, at 7:49 p.m., CALDWELL sent a Facebook message stating, “Us storming the castle. Please share. Sharon was right with me! I am such an instigator! She was ready for it man! Didn’t even mind the tear gas.” Two minutes later, CALDWELL sent a message noting, “Proud boys scuffled with cops and drove them inside to hide. Breached the doors. One guy made it all the way to the house floor, another to Pelosi’s office. A good time.” Less than a minute later, he sent a message directing that, “We need to do this at the local level. Lets storm the capitol in Ohio. Tell me when!”

36. Furthermore, a cell site analysis reveals that a cell phone registered to Sharon Caldwell—CALDWELL’s spouse, whom CALDWELL appears to reference in the Facebook

message above—was present in the vicinity of the Capitol on January 6, 2021, during the time of the incursion

37. On January 9, 2021, three days after the Capitol incursion, CALDWELL sent a Facebook message in which he shared a link to a YouTube video and wrote that he appeared at the 2:24 mark, “before the assault.” I have viewed the video,⁷ and in it, CALDWELL motions to the Capitol building and shouts, “Every single [expletive beeped in original] in there is a traitor. Every single one!”

PICTURE 12



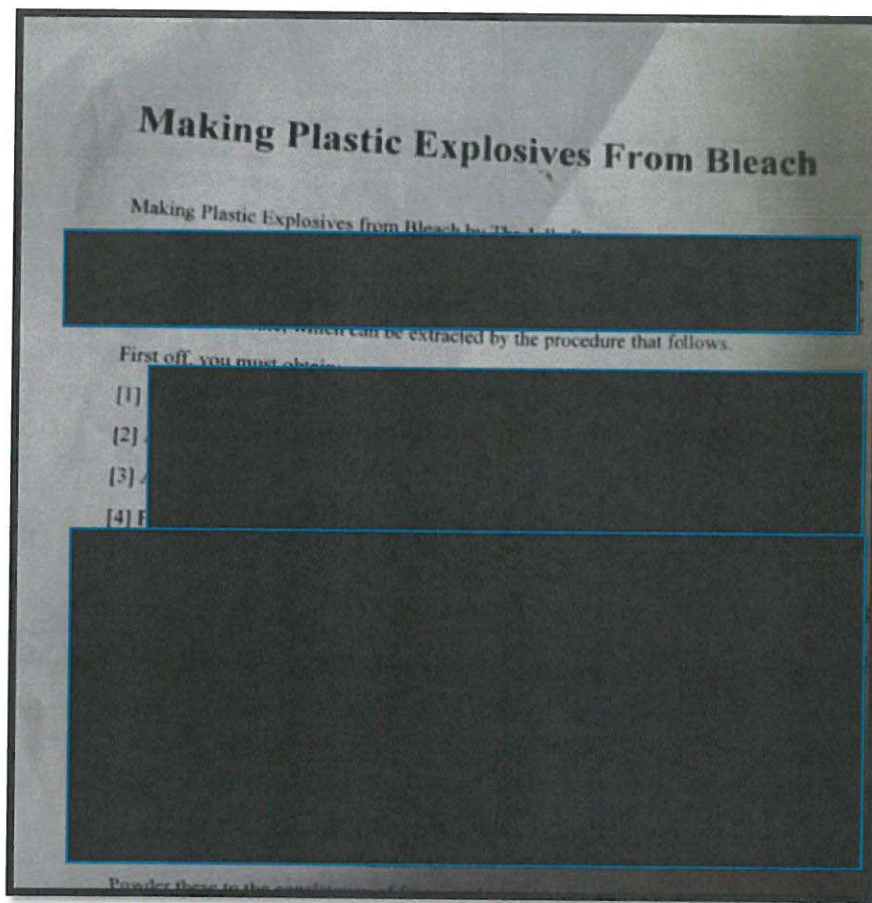
Subsequent Investigation

38. On January 16, 2021, the government obtained a warrant for WATKINS’ and CROWL’s arrests from the District Court for the District of Columbia, and a warrant to search WATKINS’ home in Woodstock, Ohio, from the District Court for the Southern District of Ohio.

⁷ https://www.youtube.com/watch?v=L5hksM_R59M (last accessed January 18, 2021).

43. On January 17, 2021, FBI agents in Ohio attempted to execute both warrants in Ohio. Agents were unable to locate WATKINS, but initiated the search of her home. One record that agents recovered appears to be directions for making explosives, authored by "The Jolly Roger." I know that WATKINS operates a bar known as the Jolly Roger, and is believed to operate a Facebook account under that same user name.

PICTURE 13



44. Law-enforcement also located within WATKINS' home protective and battle gear of the sort worn during the offenses of January 6, 2021 (to include a camouflage hat and jackets; a backpack with medical/PPE supplies; a black tactical kit with medical supplies, radio, mini drone, and pepper spray; a bag containing a helmet and respirators; and a bag containing a helmet, radio,

and belt); cellular telephones; numerous firearms; a paintball gun with rubber-steel balls and a cylinder; pool cues cut down to baton size; and zip/cable ties, among other items).

45. During a search on January 17, 2021, of a location where CROWL was said to have occasionally stayed, law enforcement recovered a green reinforced vest. Affixed to the vest was a label with the name “Trapper,” which, as described above, was the label visible on video and in photos that captured CROWL during the incursion of the Capitol.

46. While searching WATKINS’ home, agents encountered an associate of WATKINS’, Witness-1 (W-1). W-1 provided the following information:

- a. Although WATKINS returned to Ohio after the January 6, 2021, incursion, she subsequently left Ohio on or about January 14 to stay with a friend and fellow Oath Keeper whom W-1 knew as “Tom” or “Commander Tom.” As described below, your affiant believes this individual is CALDWELL.
- b. WATKINS provided W-1 with instructions on how to contact her, including by providing a phone number with a Virginia area code. A database check for this phone number revealed that it is a phone registered to CALDWELL’s spouse—the same phone that a cell site analysis reveals was present in the vicinity of the Capitol on January 6, 2021, during the time of the incursion.

47. On January 17, 2021, WATKINS and CROWL were arrested together in Ohio by the FBI. According to a police officer at the Urbana Police Department, where they turned themselves in, WATKINS and CROWL stated that they had been in Virginia and had driven eight hours back to Ohio when they learned the FBI as looking for them. I have also reviewed Facebook messages that WATKINS and CROWL exchanged on January 14, 2021, in which they discussed staying at CALDWELL’s home in Virginia, and CROWL indicated he would discuss this option with CALDWELL. Based on the information above, I believe that between January 14 and 17, 2021, WATKINS, CROWL, and CALDWELL were together at CALDWELL’s residence in Berryville, Virginia.

Caldwell, Crowl, and Watkins' Facebook Messages

48. Communications that your affiant has reviewed from CALDWELL and CROWL's Facebook accounts leading up to the January 6, 2021, show that CALDWELL, CROWL, and WATKINS planned and organized Oath Keeper activities to challenge the election results.

- a. On December 24, 2021, CALDWELL responded to a Facebook post by writing, "Driving in with my wife from Berryville VA but am soending night before at Comfort Inn Arlington/Ballston on Glebe Road. Meeting up with Oathkeepers from North Carolina and Patriot group from the Shenandoah Valley."
- b. On December 30, 2021, CALDWELL wrote: "THIS IS OUR CALL TO ACTION, FREINDS! SEE YOU ON THE 6TH IN WASHINGTON, D.C. ALONG WITH 2 MILLION OTHER LIKE-MINDED PATRIOTS."
- c. On December 31, 2021, CALDWELL replied to a Facebook comment, writing, "It begins for real Jan 5 and 6 on Washington D.C. when we mobilize in the streets. Let them try to certify some crud on capitol hill with a million or more patriots in the streets. This kettle is set to boil..."
- d. On January 1, 2021, CALDWELL replied to a Facebook comment, writing, "I accept that assignment! I swore to support and defend the Constitution of the United States against all enemies foreign and domestic. I did the former, I have done the latter peacefully but they have morphed into pure evil even blatantly rigging an election and paying off the political caste. We must smite them now and drive them down."
- e. Also on January 1, 2021, CALDWELL sent a Facebook message to CROWL recommending a room at the Comfort Inn Ballston for January 5-7, 2021. CALDWELL wrote: "This is a good location and would allow us to hunt at night if we wanted to. I don't know if Stewie⁸ has even gotten out his call to arms but its a little friggin late. This is one we are doing on our own. We will link up with the north carolina crew." The investigation revealed that an individual who presented herself as "Jessica Wagkins", whom I believe to be WATKINS, rented a room at the Comfort Inn Ballston from January 5-7, 2021.
- f. On January 1, 2021, CROWL sent CALDWELL a Facebook message stating, "Happy New year, to you Sir!! Guess I'll be seeing you soon. Will probably call you tomorrow...mainly because...I like to know wtf plan is. You are the man Commander."

⁸ Based on the context of this conversation, I believe that the reference to "Stewie" is to Elmer Stewart Rhodes, who is known as the leader of the Oath Keepers.

- g. On January 2, 2021, CALDWELL wrote to CROWL, “Check with Cap. I recommended the following hotel to her which STILL has rooms (unbelievable).” CALDWELL then sent a link to the Comfort Inn Ballston, the same hotel that he recommended to others on January 1. CALDWELL continued, “Sharon and I are setting up shop there. Paul has a room and is bringing someone. He will be the quick reaction force. Its going to be cold. We need a place to spend the night before minimum. Stewie never contacted me so Sharon and I are going our way. I will probably do pre-strike on the 5th though there are things going on that day. Maybe can do some night hunting. Oathkeeper friends from North Carolina are taking commercial buses up early in the morning on the 6th and back same night. Paul will have the goodies in case things go bad and we need to get heavy.”
- h. On January 3, 2021, WATKINS sent CROWL a Facebook message stating, “Running a bit behind. I’ll txt when I’m back at the bar. Getting supplies for DC.”
- i. On January 4, 2021, CROWL wrote a message that stated, “Sorry Brother, been busy planning for this week. Lemme give you a holler later tonight. We are enroute to DC right now for a few days on an Oathkeepers Op.”
- j. On January 5, 2021, an individual wrote CROWL a Facebook message that stated: “One more thing. Keep eyes on people with Red MAGA hats worn backwards. Saw a report that they were going to infiltrate crowd tomorrow.” CROWL replied: “Thanks Brother, but we are WAY ahead on that. We have infiltrators in Their ranks. We are doing the W.H. in the am and early afternoon, rest up at the Hotel, then headed back out tomorrow night ‘tifa’ hunt’in. We expect good hunting.”⁹
- k. On January 6, 2021, while at the Capitol, CALDWELL received the following Facebook message: “All members are in the tunnels under capital seal them in . Turn on gas”. When CALDWELL posted a Facebook message that read, “Inside,” he received the following messages, among others: “Tom take that bitch over”; “Tom all legislators are down in the Tunnels 3floors down”; “Do like we had to do when I was in the core start tearing oit florr go from top to bottom”; and “Go through back house chamber doors facing N left down hallway down steps.”
- l. On January 7, 2021, the day after the incursion, CALDWELL wrote to CROWL, “Did you like the pictures of us storming the castle? I tried calling Cap a lot but

⁹ I believe that CALDWELL’s use of the word “tifa” is a reference to antifa. According to the Anti-Defamation league, antifa is a loosely organized anti-fascist protest movement that, in some instances, has engaged in violent confrontations. See <https://www.adl.org/antifa> (last accessed January 19, 2021).

it was probably hard for her to hear the phone ring.” CROWL responded, “Loved it.”

- m. On January 8, 2021, CROWL sent CALDWELL a message asking for a video. CALDWELL sent it, and CROWL wrote, “Thank you Sir. Love the hell outta you Tom.” CALDWELL responded, “You too, my dear friend! We stormed the gates of corruption together (although on opposite sides of the building) so between that and our first meeting and getting to know you since I can say we will always be brothers!”

CONCLUSIONS OF AFFIANT



49. Based on the foregoing, I submit that there is probable cause to believe that THOMAS EDWARD CALDWELL, DONOVAN RAY CROWL, and JESSICA MARIE WATKINS committed violations of 18 U.S.C. §§ 371, 372, 1361, 1512(c)(2), 1752(a), and 40 U.S.C. § 5104(e)(2).

50. As such, I respectfully request that the Court permit the filing of this Amended Complaint and consolidate these matters under a single case number.



SPECIAL AGENT MICHAEL M. PALIAN 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 19th day of January, 2021.



2021.01.19
12:54:09 -05'00'

HON. ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

UNITED STATES OF AMERICA,	:	Case No. 3:21-MJ-23
	:	
Plaintiff,	:	Magistrate Judge Sharon L. Ovington
	:	
vs.	:	
	:	
JESSICA MARIE WATKINS,	:	
	:	
Defendant.	:	
	:	

REMOVAL AND COMMITMENT ORDER

This case came to be heard pursuant to Fed. R. Crim. P. 5(c)(3). Defendant herein was arrested in this District on a warrant issued upon an Amended Complaint in the United States District Court for the District of Columbia in Case No. 1:21-MJ-00119. Defendant appeared in open Court on January 19, 2021, and after being advised of her rights, waived her right to an identity hearing and detention hearing on the Government's Motion for Pretrial Detention. Defendant requested that a detention hearing and preliminary hearing be held in the District Court for the District of Columbia.

IT IS ORDERED THAT THE DEFENDANT BE REMOVED TO THE United States District Court for the District of Columbia, where the charges are pending against her, for any other proceedings, as ordered by that court.

TO THE UNITED STATES MARSHAL:

You are hereby commanded to take custody of the above-named Defendant and to transport that Defendant with a copy of this commitment forthwith to the district of offense as specified above and there deliver the Defendant to the United States Marshal for that District or to some other officer authorized to receive the Defendant, all proceedings required by Fed. R. Crim. P. 5 having been completed.

January 20, 2021

s/Sharon L. Ovington
Sharon L. Ovington
United States Magistrate Judge

Other Orders/Judgments

3:21-mj-00023-SLO *SEALED* USA v. Watkins

U.S. District Court

Southern District of Ohio

Notice of Electronic Filing

The following transaction was entered on 1/20/2021 at 1:45 PM EST and filed on 1/20/2021

Case Name: USA v. Watkins

Case Number: 3:21-mj-00023-SLO *SEALED*

Filer:

Document Number: 9

Docket Text:

Order Regarding Use Of Video Conferencing as to Jessica Marie Watkins. Signed by Magistrate Judge Sharon L. Ovington on 1/20/21. (rp)

3:21-mj-00023-SLO *SEALED*-1 Notice has been electronically mailed to:

Dominick S. Gerace, II dominick.s.gerace@usdoj.gov, CaseView.ECF@usdoj.gov, USAOHS.ECFDayCrim@usdoj.gov, cathy.robillard@usdoj.gov, jill.flowers@usdoj.gov

Nicholas Dingeldein nicholas.dingeldein@usdoj.gov, Leslie.Ide@usdoj.gov

3:21-mj-00023-SLO *SEALED*-1 Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1040326259 [Date=1/20/2021] [FileNumber=7430495-0] [176493fb2e486c5b7e485b7985f77551a9b50f920b6fba9aed48f733aa8950b1b7a111468450740223b5671d43fd204bbb374f7f50ebfd5458ccf0ad063abe4c]]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA, : Case No. 3:21-MJ-23
Plaintiff, :
vs. : Magistrate Judge Sharon L. Ovington
JESSICA MARIE WATKINS, :
Defendant. :
:

ORDER REGARDING USE OF VIDEO CONFERENCING

Pursuant to the CARES Act H.R.748 § 15002 *et seq*, and in accordance with General Order 20-07, this Court finds that the Defendant, after consultation with counsel, has consented to the use of video conferencing to conduct the Initial Appearance held on January 19, 2021.

Accordingly, the proceeding held on this date may be conducted by video conference.

IT IS SO ORDERED.

January 20, 2021

s/Sharon L. Ovington
Sharon L. Ovington
United States Magistrate Judge

Other Orders/Judgments

3:21-mj-00023-SLO *SEALED* USA v. Watkins

U.S. District Court

Southern District of Ohio

Notice of Electronic Filing

The following transaction was entered on 1/20/2021 at 1:34 PM EST and filed on 1/20/2021

Case Name: USA v. Watkins

Case Number: 3:21-mj-00023-SLO *SEALED*

Filer:

Document Number: 8

Docket Text:

Due Process Protections Act Order as to Jessica Marie Watkins. Signed by Magistrate Judge Sharon L. Ovington on 1/20/21. (rp)

3:21-mj-00023-SLO *SEALED*-1 Notice has been electronically mailed to:

Dominick S. Gerace, II dominick.s.gerace@usdoj.gov, CaseView.ECF@usdoj.gov,
USAOHS.ECFDayCrim@usdoj.gov, cathy.robillard@usdoj.gov, jill.flowers@usdoj.gov

Nicholas Dingeldein nicholas.dingeldein@usdoj.gov, Leslie.Ide@usdoj.gov

3:21-mj-00023-SLO *SEALED*-1 Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1040326259 [Date=1/20/2021] [FileNumber=7430458-0]
][6e361299518eecd1d97856f900b46463e06eaa66f8f7a038c9f520721d3a5cd165a
ff547cc5f43bbce802746a5a8b02c48ed5b6292edf8e5b5b2f180b2ea007d]]

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

UNITED STATES OF AMERICA,	:	Case No. 3:21-MJ-23
	:	
Plaintiff,	:	Magistrate Judge Sharon L. Ovington
	:	
vs.	:	
	:	
JESSICA MARIE WATKINS,	:	
	:	
Defendant.	:	
	:	

DUE PROCESS PROTECTIONS ACT ORDER

Pursuant to the Due Process Protections Act, the Court confirms the United States' obligation to produce all exculpatory evidence to the defendant pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963) and its progeny, and orders it to do so. Failing to do so in a timely manner may result in consequences, including, but not limited to, exclusion of evidence, adverse jury instructions, dismissal of charges, contempt proceedings, or sanctions by the Court.

IT IS SO ORDERED.

January 20, 2021

s/Sharon L. Ovington
Sharon L. Ovington
United States Magistrate Judge

Other Orders/Judgments

3:21-mj-00023-SLO *SEALED* USA v. Watkins

U.S. District Court

Southern District of Ohio

Notice of Electronic Filing

The following transaction was entered on 1/20/2021 at 12:17 PM EST and filed on 1/19/2021

Case Name: USA v. Watkins

Case Number: 3:21-mj-00023-SLO *SEALED*

Filer:

Document Number: 7

Docket Text:

ORDER APPOINTING FEDERAL PUBLIC DEFENDER for Jessica Marie Watkins. Signed by Magistrate Judge Sharon L. Ovington on 1/19/21. (rp)

3:21-mj-00023-SLO *SEALED*-1 Notice has been electronically mailed to:

Dominick S. Gerace, II dominick.s.gerace@usdoj.gov, CaseView.ECF@usdoj.gov,
USAOHS.ECFDayCrim@usdoj.gov, cathy.robillard@usdoj.gov, jill.flowers@usdoj.gov

Nicholas Dingeldein nicholas.dingeldein@usdoj.gov, Leslie.Ide@usdoj.gov

3:21-mj-00023-SLO *SEALED*-1 Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1040326259 [Date=1/20/2021] [FileNumber=7430017-0
][7472d3ba4a6884947f977ebe4d57219fcbf033e58e99ac6f094dd2b50b3a15ffd4b
dfd7b7e44ece182f7646c0e9dce00fca323352aead192ed407ce63f0014c6]]

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	Case No. 3:21-mj-23
-vs-	:	Magistrate Judge Sharon L. Ovington
JESSICA WATKINS,	:	
Defendant.	:	

ORDER APPOINTING THE PUBLIC DEFENDER AS COUNSEL

This case is before the Court upon Defendant’s application for appointment of counsel pursuant to [18 U.S.C. §3006A](#). Upon the Court’s *Sua Sponte* Order for Appointment of Counsel the Court appointed the Federal Public Defender.

IT IS ACCORDINGLY ORDERED that the Federal Public Defender for the Southern District of Ohio be assigned to represent the Defendant in this case.

January 19, 2021

s/Sharon L. Ovington
 Sharon L. Ovington
 United States Magistrate Judge

Other Documents

3:21-mj-00023-SLO *SEALED* USA v. Watkins

U.S. District Court

Southern District of Ohio

Notice of Electronic Filing

The following transaction was entered on 1/20/2021 at 12:10 PM EST and filed on 1/19/2021

Case Name: USA v. Watkins

Case Number: 3:21-mj-00023-SLO *SEALED*

Filer: Dft No. 1 - Jessica Marie Watkins

Document Number: 6

Docket Text:

CJA 23 Financial Affidavit by Jessica Marie Watkins. (rp)

3:21-mj-00023-SLO *SEALED*-1 Notice has been electronically mailed to:

Dominick S. Gerace, II dominick.s.gerace@usdoj.gov, CaseView.ECF@usdoj.gov,
USAOHS.ECFDayCrim@usdoj.gov, cathy.robillard@usdoj.gov, jill.flowers@usdoj.gov

Nicholas Dingeldein nicholas.dingeldein@usdoj.gov, Leslie.Ide@usdoj.gov

3:21-mj-00023-SLO *SEALED*-1 Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1040326259 [Date=1/20/2021] [FileNumber=7429968-0]
][2cc2e126d1c0d2737794b1a2ac496fe4833c9044fb4cf6e3e542b3daa326387d93e
ef1a17e0a0ad4acf4697031601dc1dcea5684c87a1797be2ef4fa9049fc24]]

CJA 23 (Rev. 11/11) **FINANCIAL AFFIDAVIT**
 IN SUPPORT OF REQUEST FOR ATTORNEY, EXPERT, OR OTHER SERVICES WITHOUT PAYMENT OF FEE

IN THE UNITED STATES DISTRICT COURT COURT OF APPEALS OTHER (Specify below)

IN THE CASE OF _____ FOR _____

AT _____ LOCATION NUMBER _____

PERSON REPRESENTED (Show your full name)
Jessica Watkins

CHARGE/OFFENSE (Describe it applicably & check box) Felony Misdemeanor

1 Defendant - Adult
 2 Defendant - Juvenile
 3 Appellant
 4 Probation Violator
 5 Supervised Release Violator
 5 Habeas Petitioner
 7 2255 Petitioner
 8 Material Witness
 9 Other (Specify)

DOCKET NUMBERS
 Magistrate Judge _____
 District Court _____
 Court of Appeals _____

ANSWERS TO QUESTIONS REGARDING ABILITY TO PAY

EMPLOYMENT
 Are you now employed? Yes No Self-employed
 Name and address of employer *164 E. Bennett St. Wadestak, UT 43054, Jolly Paper Rec & Gr. Inc*
 IF YES, how much do you earn per month? \$ *2000 - 300 (tips)* IF NO, give month and year of last employment? _____
 How much did you earn per month? \$ _____
 If married, is your spouse employed? Yes No
 IF YES, how much does your spouse earn per month? \$ _____
 If you are a minor under age 21, what is the approximate monthly income of your parent(s) or guardian(s)? \$ _____

INCOME & ASSETS
OTHER INCOME
 Have you received within the past 12 months any income from a business, profession or other form of self-employment or in the form of rent payments, interest, dividends, retirement or annuity payments or other sources? Yes No
 IF YES, give the amount received and identify the sources
 RECEIVED: \$ *500 per month* SOURCES: *But from friend for apartment*

CASH
 Do you have any cash on hand or money in savings or checking accounts? Yes No IF YES, total amount? \$ *unknown*

PROPERTY
 Do you own any real estate, stocks, bonds, notes, automobiles or other valuable property (excluding ordinary household furnishings and clothing)? Yes No
 IF YES, give value and description for each
 VALUE: \$ *11,000* DESCRIPTION: *2009 Ford Fusion*

OBLIGATIONS & DEBTS

DEPENDENTS	<input checked="" type="checkbox"/> MARITAL STATUS	Total No. of Dependents	List persons you actually support and your relationship to them
	Single Married Widowed Separated or Divorced		
DEBTS & MONTHLY BILLS (Rent, utilities, loans, charge accounts, etc.)	DESCRIPTION	TOTAL DEBT	MONTHLY PAYMENT
		<i>Rent</i> <i>Credit Card</i> <i>Utilities</i> <i>Property/Land tax</i>	<i>\$ 1000 AP</i> <i>\$ 500 CP</i> <i>\$ 1000 (approx)</i> <i>\$ var</i>

I certify under penalty of perjury that the foregoing is true and correct

Jessica M. Watkins
 SIGNATURE OF DEFENDANT
 (OR PERSON REPRESENTED)

19 Jan 21
 Date

Minute Entries

3:21-mj-00023-SLO *SEALED* USA v. Watkins

U.S. District Court

Southern District of Ohio

Notice of Electronic Filing

The following transaction was entered on 1/20/2021 at 12:06 PM EST and filed on 1/20/2021

Case Name: USA v. Watkins

Case Number: 3:21-mj-00023-SLO *SEALED*

Filer:

Document Number: No document attached

Docket Text:

Minute Entry for proceedings held before Magistrate Judge Sharon L. Ovington via GTM: Initial Appearance in Rule 5 Proceedings as to Jessica Marie Watkins held on 1/20/2021; AUSA Nicholas Dingeldein appeared on behalf of the Government; Defendant consented to appearing virtually as a result of the Coronavirus Pandemic; Defendant is unable to afford counsel; AFPD Thomas W. Anderson is appointed for Jessica Marie Watkins; rights and penalties explained and understood; CR Rule 5(f) statement regarding exculpatory evidence stated into the record by the Court; the Government is moving for pretrial detention; Defendant WAIVED her right to an Identity Hearing; Defendant reserves her right to Preliminary and Detention Hearings in the District of Columbia where charges are pending; the oral WAIVERS are ACCEPTED by the Court; Defendant will be transferred to D.C.; Defendant orally moved for a limited unsealing of the Complaint for Attorney's eyes only; no objection from the Government; GRANTED by the Court; Defendant is remanded to the custody of the US Marshal as to Jessica Marie Watkins. (Recorded By: CourtSmart, record number: 1:39-1:48/2:01-2:04) (rp)

3:21-mj-00023-SLO *SEALED*-1 Notice has been electronically mailed to:

Dominick S. Gerace, II dominick.s.gerace@usdoj.gov, CaseView.ECF@usdoj.gov, USAOHS.ECFDayCrim@usdoj.gov, cathy.robillard@usdoj.gov, jill.flowers@usdoj.gov

Nicholas Dingeldein nicholas.dingeldein@usdoj.gov, Leslie.Ide@usdoj.gov

3:21-mj-00023-SLO *SEALED*-1 Notice has been delivered by other means to:

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

v.

JESSICA MARIE WATKINS,

Defendant.

Case No. 3:21-MJ-23

UNITED STATES' MOTION
FOR PRETRIAL DETENTION
AND HEARING THEREON

1. DETENTION (CHECK IF APPLICABLE)

- The United States of America (“United States”) respectfully requests that the defendant be detained pending trial because no condition or combination of conditions will reasonably assure both (1) the appearance of the defendant as required in this action, and (2) the safety of any other person and the community. (See, 18 U.S.C. § 3142(a)(4), (e), (f), (g) and (i).)

A. Rebuttable Presumption Applies: Appearance of the Defendant and Safety of Community (18 U.S.C. § 3142(e)) (check if applicable)

- A rebuttable presumption that no condition or combination of conditions will reasonably assure both (a) the appearance of the defendant as required in this action, and (b) the safety of the community applies because there is probable cause to believe that the defendant committed (check all that apply):
- an offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act (21

U.S.C. 801 et seq.), the Controlled Substances Import and Export Act (21 U.S.C. 951 et seq), or chapter 705 of Title 46 of the United States Code;

- an offense under 18 U.S.C. §§ 924(c) (Use or Carrying a Firearm During and in Relation to/Possession in Furtherance of, a Crime of Violence or Drug Trafficking Crime), 956(a) (Conspiracy to Kill, Kidnap, Maim, or Injure Persons or Damage Property in a Foreign Country), or 2332b (Acts of Terrorism Transcending National Boundaries);
- an offense listed in 18 U.S.C. § 2332b(g)(5)(B) (listing offenses included in definition of “Federal crime of terrorism”) for which a maximum term of imprisonment of ten (10) years or more is prescribed;
- an offense involving a minor victim under 18 U.S.C. §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1)-(3), 2252A(a)(1)-(4), 2260, 2421, 2422, 2423, or 2425.

B. Rebuttable Presumption Applies: Safety of Others and Community (18 U.S.C. § 3142(e)(1)-(3)) (check if applicable)

- This is a case described in 18 U.S.C. § 3142(f)(1), and a rebuttable presumption that no condition or combination of conditions will reasonably assure the safety of any other person and the community applies because (a) the defendant has been convicted of a Federal offense

that is described in 18 U.S.C. § 3142(f)(1), or of a State or local offense that would have been an offense described in 18 U.S.C. § 3142(f)(1) if a circumstance giving rise to Federal jurisdiction had existed (hereafter, “the Offense”), (b) the Offense was committed while the defendant was on release pending trial for a Federal, State, or local offense, and (c) a period of not more than five (5) years has elapsed since the date of conviction, or the release of the person from imprisonment, for the Offense, whichever is later.

2. TEMPORARY DETENTION (CHECK IF APPLICABLE)

- The United States seeks temporary detention for ten (10) days, excluding Saturdays, Sundays, and holidays, to permit revocation of conditional release, deportation, or exclusion, because (1) the defendant may flee or pose a danger to any other person or the community (18 U.S.C. § 3142(d)(2)), and (2) the defendant (check all that apply):
 - is, and was at the time the offense was committed, on release pending trial for a felony under Federal, State, or local law (18 U.S.C. § 3142(d)(1)(A)(i));
 - is, and was at the time the offense was committed, on release pending imposition of execution of sentence, appeal of sentence or conviction, or completion of sentence, for any offense under Federal, State, or local law (18 U.S.C. § 3142(d)(1)(A)(ii));

- is, and was at the time the offense was committed, on probation or parole for any offense under Federal, State or local law (18 U.S.C. § 3142(d)(1)(A)(iii));
- is not a citizen of the United States or lawfully admitted for permanent residence, as defined in 8 U.S.C. § 1101(a)(20) (18 U.S.C. § 3142(d)(1)(B)).

3. **DETENTION HEARING (CHECK IF APPLICABLE)**

- A hearing pursuant to the provisions of 18 U.S.C. § 3142(f) must be held before detaining a defendant pending trial (18 U.S.C. § 3142(e)), unless waived by that defendant. (*U.S. v. Clark*, 865 F.2d 1433, 1437 (4th Cir. 1989).) The United States accordingly respectfully requests that this Court hold such a hearing, unless waived by the defendant.

A. **Hearing Must be Granted (check if applicable)**

- Such a hearing must be granted because this case involves (check all that apply):
 - a crime of violence as defined in 18 U.S.C. § 3156(a)(4), namely,
 - (i) an offense that has an element of the offense the use, attempted use, or threatened use of physical force against the person or property of another, (ii) a felony that, by its nature, involves a substantial risk that physical force against the person or property of another may be used in the course of committing the offense, or (iii) a felony under chapter 109A (Sexual Abuse), 110 (Sexual

Exploitation and Other Abuse of Children), or 117 (Transportation for Illegal Sexual Activity and Related Crimes) of Title 18 of the United States Code ([18 U.S.C. § 3142\(f\)\(1\)\(A\)](#));

- an offense listed in [18 U.S.C. § 2332b\(g\)\(5\)\(B\)](#) (listing offenses included in definition of “Federal crime of terrorism”) for which a maximum term of imprisonment of ten (10) years or more is prescribed ([18 U.S.C. § 3142\(f\)\(1\)\(A\)](#));
- an offense for which the maximum sentence is life imprisonment or death ([18 U.S.C. § 3142\(f\)\(1\)\(B\)](#));
- an offense for which a maximum term of imprisonment of 10 years or more is prescribed in (i) the Controlled Substance Act (21 U.S.C. §§ 801 et seq.), (ii) the Controlled Substances Import and Export Act ([21 U.S.C. §§ 951 et seq.](#)), or (iii) chapter 705 of Title 46 of the United States Code ([18 U.S.C. § 3142\(f\)\(1\)\(C\)](#));
- a felony where the defendant has been convicted of (i) two or more offenses described in [18 U.S.C. §§ 3142\(f\)\(1\)\(A\)-\(C\)](#), (ii) two or more State or local offenses that would have been offenses described in [18 U.S.C. §§ 3142\(f\)\(1\)\(A\)-\(C\)](#) if a circumstance giving rise to Federal jurisdiction had existed, or (iii) a combination of such offenses ([18 U.S.C. § 3142\(f\)\(1\)\(D\)](#));
- a felony that involves a minor victim ([18 U.S.C. § 3142\(f\)\(1\)\(E\)](#));

- a felony that involves the possession or use of a firearm or destructive device (as those terms are defined in 18 U.S.C. § 921) (18 U.S.C. § 3142(f)(1)(E));
- a felony that involves a failure to register under 18 U.S.C. § 2250 (18 U.S.C. § 3142(f)(1)(E));
- a serious risk that the defendant will flee (18 U.S.C. § 3142(f)(2)(A));
- a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness or juror (18 U.S.C. § 3142(f)(2)(B)).

B. Hearing May be Granted at the Court's Discretion (check if applicable)

- The Court is not required to grant a hearing, but such a hearing is requested nonetheless as explained in the attached Memorandum.

C. Continuance of Hearing Requested (18 U.S.C. § 3142(f) (check one if applicable)

- The United States respectfully requests a continuance of three (3) days (not including any intermediate Saturday, Sunday, or legal holiday) in which to hold the detention hearing, during which time the defendant shall be detained.
- The United States respectfully requests a continuance of greater than three (3) days (not including any intermediate Saturday, Sunday, or legal

holiday), namely, until _____, in which to hold the detention hearing, for good cause, as explained in the attached Memorandum, during which time the defendant shall be detained.

D. Medical Examination Requested During Continuance (18 U.S.C. § 3142(f))
(check if applicable and only if continuance is requested)

- During the requested continuance, the United States respectfully requests that the defendant, who appears to be a narcotics addict, receive a medical examination to determine whether the defendant is an addict.

Respectfully submitted,

DAVID M. DEVILLERS
United States Attorney

s/Nicholas Dingeldein
NICHOLAS DINGELDEIN (NY 5284674)
Assistant United States Attorney
200 West Second Street, Suite 600
Dayton, Ohio 45402
(937) 225-2910
Fax: (937) 225-2564
Nicholas.Dingeldein@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 19th day of January, 2021, on defense counsel via the Court's ECF system.

s/Nicholas Dingeldein
NICHOLAS DINGELDEIN (NY 5284674)
Assistant United States Attorney

FILED
RICHARD W. NAGEL
CLERK OF COURT

1/19/21

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. DAYTON

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

JESSICA MARIE WATKINS
Defendant.

Case No: 3:21-mj-23

18 U.S.C. § 1752(a)
(Restricted Building or Grounds)

40 U.S.C. § 5104(e)(2)
(Violent Entry or Disorderly Conduct)

18 U.S.C. § 1512(c)(2),
(Obstruction of an Official Proceeding)

UNDER SEAL

ORDER

Upon consideration of the Government's Motion to Seal the Criminal Complaint and Arrest Warrant, concerning the above-defendant, it is hereby

ORDERED that the Criminal Complaint, the Affidavit of the United States for the Criminal Complaint, Arrest Warrant, and the Government's Motion to Seal, and this corresponding Court Order be sealed until further Order of this Court.

ORDERED that notwithstanding the sealing, the government may disclose the criminal complaint and arrest warrant in furtherance of its law enforcement and prosecution needs and discovery obligations.

ORDERED that upon execution of the arrest warrant in this case, the charging documents shall be unsealed.

1/16/2021
DATE



2021.01.16
15:14:35 -05'00'

ZIA M. FARUQUI
UNITED STATES MAGISTRATE JUDGE
for the DISTRICT OF COLUMBIA

UNITED STATES DISTRICT COURT

for the
District of Columbia

United States of America
v.
JESSICA MARIE WATKINS

Case No. 3:21-mj-23

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Jessica Marie Watkins
who is accused of an offense or violation based on the following document filed with the court:

- Indictment, Superseding Indictment, Information, Superseding Information, Complaint, Probation Violation Petition, Supervised Release Violation Petition, Violation Notice, Order of the Court

This offense is briefly described as follows:

- 18 U.S.C. § 1752(a) (Restricted Building or Grounds)
40 U.S.C. § 5104(e)(2) (Violent Entry or Disorderly Conduct)
18 U.S.C. § 1512(c)(2) (Obstruction of an Official Proceeding)

Date: 01/16/2021

2021.01.16
15:16:28 -05'00'

Issuing officer's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge
Printed name and title

Return

This warrant was received on (date) , and the person was arrested on (date)
at (city and state)

Date:

Arresting officer's signature

Printed name and title

UNITED STATES DISTRICT COURT

for the

FILED
RICHARD W. NAGEL
CLERK OF COURT

1/19/21

United States of America
v.
JESSICA MARIE WATKINS
[Redacted]

Case No. 3:21-mj-23

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. DAYTON

Magistrate Judge Sharon L. Ovington

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 01/06/2021 in the county of [Redacted] in the
District of Columbia, the defendant(s) violated:

Table with 2 columns: Code Section and Offense Description. Rows include 18 U.S.C. § 1752(a), 40 U.S.C. § 5104(e)(2), and 18 U.S.C. § 1512(c)(2) with corresponding offense descriptions.

This criminal complaint is based on these facts:
See attached affidavit.

Continued on the attached sheet.

Signature of Michael M. Palian Jr.
Complainant's signature
Michael M. Palian Jr., Special Agent- FBI
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 01/16/2021

Signature of Zia M. Faruqui
2021.01.16 15:15:54 -05'00'
Judge's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge
Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No:
	:	
v.	:	18 U.S.C. § 1752(a)
	:	(Restricted Building or Grounds)
	:	
	:	40 U.S.C. § 5104(e)(2)
JESSICA MARIE WATKINS	:	(Violent Entry or Disorderly Conduct)
Defendant.	:	
	:	18 U.S.C. § 1512(c)(2)
	:	(Obstruction of an Official Proceeding)
	:	
	:	<u>UNDER SEAL</u>
	:	

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
AND ARREST WARRANT**

I, Michael M. Palian Jr., being first duly sworn, hereby depose and state as follows:

PURPOSE OF AFFIDAVIT

1. This Affidavit is submitted in support of a Criminal Complaint charging JESSICA MARIE WATKINS (“WATKINS”) with violations of 18 U.S.C. § 1752(a), 40 U.S.C. § 5104(e) and 18 U.S.C. § 1512(c)(2). I respectfully submit that this Affidavit establishes probable cause to believe that WATKINS (1) did knowingly enter or remain in any restricted building or grounds without lawful authority, or did knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct; (2) did willfully and knowingly 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 any deliberations of either House of Congress; and (3) corruptly did obstruct, influence, or impede any proceeding before the Congress. Specifically, on or about January 6, 2021, WATKINS traveled to

Washington, D.C. and knowingly and willfully joined and encouraged a crowd of individuals who forcibly entered the U.S. Capitol and impeded, disrupted, and disturbed the orderly conduct of business by the United States House of Representatives and the United States Senate.

BACKGROUND OF AFFIANT

2. I am a Special Agent with the FBI and have been so employed since February 2003. As a Special Agent with the FBI, I am empowered by law to conduct investigations, make arrests, and execute and serve search and arrest warrants for offenses enumerated in Title 21 and Title 18 of the United States Code. I have a Ph.D in bio-organic chemistry, and have also received training and gained experience in a variety of criminal laws and procedures, including those involving drug distribution, white collar crime and crimes of violence. Through my training, education and experience, I have become familiar with the manner in which criminal activity is carried out, and the efforts of persons involved in such activity to avoid detection by law enforcement.

3. Unless otherwise stated, the information in this Affidavit is either personally known to me, has been provided to me by other individuals, or is based on a review of various documents, records, and reports. Because this Affidavit is submitted for the limited purpose of establishing probable cause to support an application for an arrest warrant, it does not contain every fact known by me or the United States. The dates listed in this Affidavit should be read as “on or about” dates.

BACKGROUND

Incursion at the U.S. Capitol on January 6, 2021

4. The U.S. Capitol, which is located at First Street, SE, in Washington, D.C., is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification are allowed access inside the U.S. Capitol.

5. On January 6, 2021, the exterior plaza of the U.S. Capitol was closed to members of the public.

6. On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. 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 United States 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 Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

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

8. At approximately 2:00 p.m., certain individuals in the crowd forced their way through, up, and over the barricades, and officers of the U.S. Capitol Police, 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 U.S. Capitol Police Officers or other authorized security officials.

9. At such time, the certification proceedings still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police 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 U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

10. Shortly thereafter, at approximately 2:20 p.m., members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, 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 U.S. Capitol, including the danger posed by individuals who had entered the U.S. Capitol without any security screening or weapons check, Congressional proceedings could not resume until after every unauthorized occupant had left the U.S. Capitol, and the building had been confirmed secured. The proceedings resumed at approximately 8:00 pm 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.

11. 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 U.S. Capitol building without authority to be there.

The Oath Keepers

12. Law enforcement and news media organizations observed that members of a

paramilitary organization known as the Oath Keepers were among the individuals and groups who knowingly, willfully, and forcibly entered the U.S. Capitol.

13. The Oath Keepers are a large but loosely organized collection of militia who believe that the federal government has been coopted by a shadowy conspiracy that is trying to strip American citizens of their rights. Though the Oath Keepers will accept anyone as members, what differentiates them from other anti-government groups is their explicit focus on recruiting current and former military, law enforcement and first responder personnel. The organization's name alludes to the oath sworn by members of the military and police to defend the Constitution "from all enemies, foreign and domestic." Members of the Oath Keepers have been arrested in connection with a wide range of criminal activities, including various firearms violations, conspiracy to impede federal workers, possession of explosives, and threatening public officials.

14. According to an archive of the Oath Keepers website created on December 24, 2020, the Oath Keepers profess to be

a non-partisan association of current and formerly serving military, police, and first responders, who pledge to fulfill the oath all military and police take to "defend the Constitution against all enemies, foreign and domestic." That oath, mandated by Article VI of the Constitution itself, is to the Constitution, not to the politicians, and Oath Keepers declare that they will not obey unconstitutional orders, such as orders to disarm the American people, to conduct warrantless searches, or to detain Americans as "enemy combatants" in violation of their ancient right to jury trial.

Based on this mission statement—including that Oath Keepers swear not to obey orders that they consider unconstitutional—as well as additional information gained in the course of my investigation, I am aware that Oath Keepers will violate federal law if they believe their cause is just.

Jessica Watkins

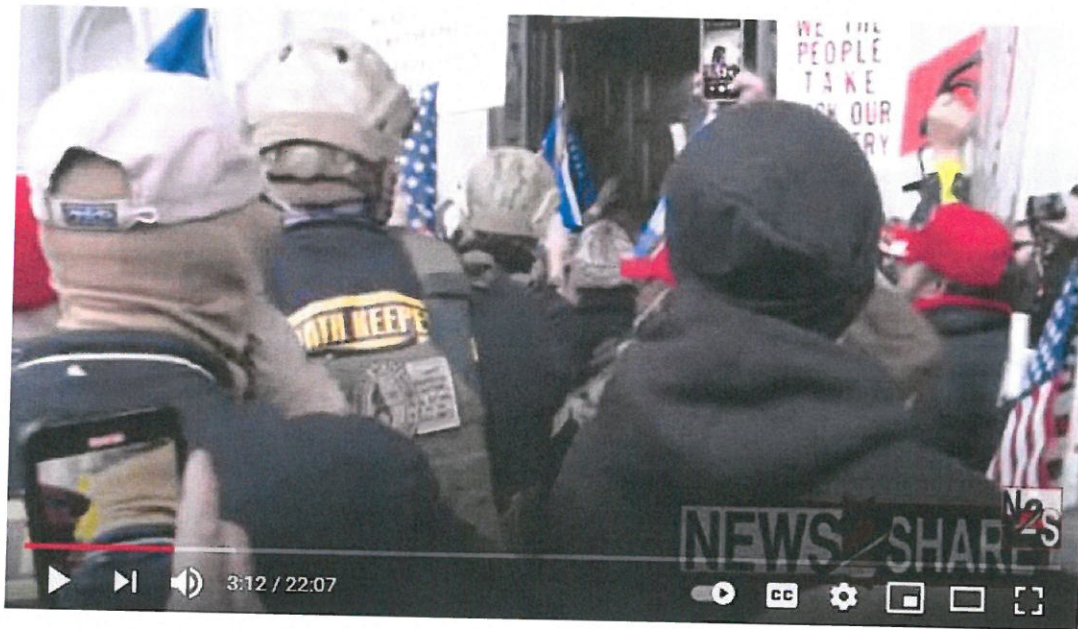
15. JESSICA WATKINS is a 38-year-old resident of Champaign County, Ohio.

WATKINS appears to be affiliated with a group known as the Oath Keepers. At the top of WATKINS' social media account page on Parler, WATKINS states that she is "C.O. [Commanding Officer] of the Ohio State Regular Militia." Based on information gained during the course of my investigation, I am aware that the Ohio State Regular Militia is a local militia organization which is a dues-paying subset of the Oath Keepers.

STATEMENT OF FACTS SUPPORTING PROBABLE CAUSE

16. I have reviewed footage of the January 6, 2021, incursion of the U.S. Capitol, including a video that, at the approximate 3 minute and 8 second mark, shows 8 to 10 individuals in paramilitary equipment aggressively approaching an entrance to the Capitol building.¹ These individuals, who are wearing helmets, reinforced vests, and clothing with Oath Keeper paraphernalia, move in an organized and practiced fashion and force their way to the front of the crowd gathered around a door to the U.S. Capitol.

PICTURE 1:



¹ <https://www.youtube.com/watch?v=b76KfHB0QO8&feature=youtu.be> (last viewed January 14, 2021)

17. A close-up view of the badges on the vest of one of these individuals, seen just under the Oath Keepers emblem on his shirt, displays the Oath Keepers motto, "Not On Our Watch."

PICTURE 2:



18. Based on the foregoing observations of the video, and information gained in the course of my investigation, I believe the organized group of individuals marching to door of the U.S. Capitol in the video above are members of the Oath Keepers.

19. At the approximate 3 hour and 20 second mark, the video shows the uncovered face of an individual in the group of Oath Keepers.

PICTURE 3:



20. I have identified this individual to be WATKINS by comparing the footage in the

video above to WATKINS's DMV photograph and other photographs of WATKINS.

21. In addition, in various social media posts, WATKINS has confirmed that on January 6, 2021, she entered the U.S. Capitol by force.

22. For instance, on January 6, Watkins posted to Parler a photograph of herself in the same Oath Keepers uniform in which she appears in Picture 3, alongside the statement: "Me before forcing entry into the Capitol Building. #stopthesteal² #stormthecapitol #oathkeepers #ohiomilitia." I am aware from public reporting after the 2020 U.S. Presidential Election that the social media hashtag #stopthesteal was used by people who believed, essentially, that the election results were influenced by fraud, and who wanted to stop the electoral college results from being certified by the Congress

PICTURE 4:

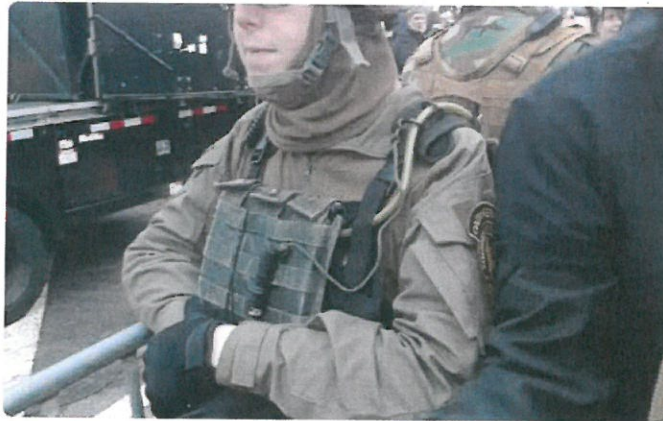


Ohio Regular Militia · @OhioStateRegulars

14 hours ago · 1816

Me before forcing entry into the Capitol Building.

#stopthesteal
#stormthecapitol
#oathkeepers
#ohiomilitia



12 1 7

² In the course of investigating this matter, I have learned that the #stopthesteal hashtag was used by many individuals who believe that the 2020 U.S. Presidential Election was fraudulent and who pledged to try to stop that election from being certified.

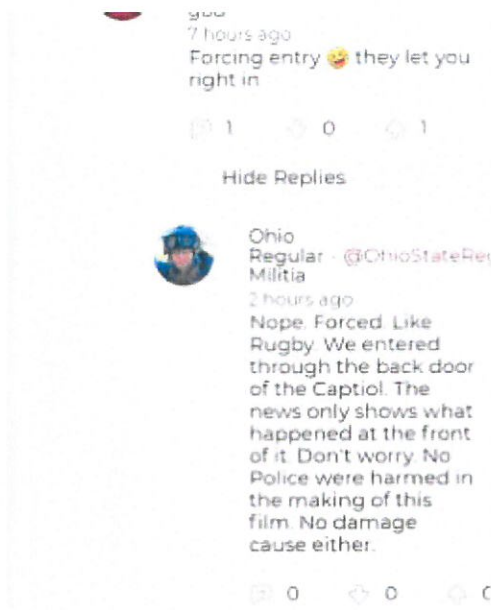
23. Also on Parler, on January 6, WATKINS posted another video from that day and wrote, “Yeah. We stormed the Capitol today. Teargassed, the whole, 9. Pushed our way into the Rotunda. Made it into the Senate even. The news is lying (even Fox) about the Historical Events we created today.”

PICTURE 5



24. In another Parler post, WATKINS responded to a comment challenging whether she actually forced entry by confirming, “Nope. Forced. Like Rugby. We entered through the back door of the Capitol.”

PICTURE 6



25. WATKINS also confirmed on social media that she had led other members of the Oath Keepers in the incursion at the U.S. Capitol. In another Parler post on January 6, WATKINS shared a picture of an individual in paramilitary gear, wearing an Oath Keeper patch on his arm, and wrote, “One of my guys at the Stop the Steal Rally today. #stopthesteal #stormthecapitol #oathkeepers #ohiomilitia.”

PICTURE 7:



Ohio Regular Militia · @OhioStateRegulars

14 hours ago · 1654

One of my guys at the Stop the Steal Rally today.

#stopthesteal
#stormthecapitol
#oathkeepers
#ohiomilitia



1 2 7

Show Comments

26. Your affiant submits that WATKINS' own description of her conduct—including that she “stormed” the Capitol and “pushed” her way into the Rotunda—as well as her use of the hashtags “#stopthesteal” and “#stormthecapitol” demonstrate WATKINS' intent to forcibly enter the U.S. Capitol to obstruct the proceedings there.

27. Furthermore, WATKINS gave a newspaper interview in which she further confirmed her membership in the Oath Keepers and the fact that she had participated in the incursion of the U.S. Capitol on January 6, and suggested that she had clashed with U.S. Capitol Police.

28. On January 13, 2021, the Ohio Capital Journal published an article entitled, *Ohio Bartender and Her 'Militia' Drove to D.C. to Join the Capitol Breach*.³ WATKINS is quoted in the article as saying, "To me, it was the most beautiful thing I ever saw until we started hearing glass smash. That's when we knew things had gotten really bad." WATKINS also states, "We never smashed anything, stole anything, burned anything, and truthfully we were very respectful with Capitol Hill PD until they attacked us. Then we stood our ground and drew the line."

CONCLUSIONS OF AFFIANT

29. Based on the foregoing, your Affiant submits that there is probable cause to believe that WATKINS violated:

- a. 18 U.S.C. § 1752(a), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do so; (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; (3) knowingly, and with the intent to impede or disrupt the orderly conduct of Government business or official functions, obstruct or impede ingress or egress to or from any restricted building or grounds; or (4) knowingly engage in any act of physical violence against any person or property in any restricted building or grounds; or attempts or conspires 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

³ <https://www.citybeat.com/news/blog/21147932/ohio-bartender-and-her-militia-drove-to-dc-to-join-the-capitol-breach> (last accessed, January 16, 2021)

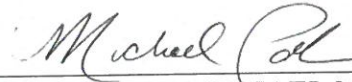
Service is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance; and

- b. 40 U.S.C. § 5104(e)(2), which makes it a crime for an individual or group of individuals to willfully and knowingly (A) enter or remain on the floor of either House of Congress or in any cloakroom or lobby adjacent to that floor, in the Rayburn Room of the House of Representatives, or in the Marble Room of the Senate, unless authorized to do so pursuant to rules adopted, or an authorization given, by that House; (B) enter or remain in the gallery of either House of Congress in violation of rules governing admission to the gallery adopted by that House or pursuant to an authorization given by that House; (C) with the intent to disrupt the orderly conduct of official business, enter or remain in a room in any of the Capitol Buildings set aside or designated for the use of— (i) either House of Congress or a Member, committee, officer, or employee of Congress, or either House of Congress; or (ii) the Library of Congress; (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; (F) engage in an act of physical violence in the Grounds or any of the Capitol Buildings; or (G) parade, demonstrate, or picket in any of the Capitol Buildings.
- c. 18 U.S.C. § 1512(c)(2), which makes it a crime to corruptly obstruct, influence, or

impede any official proceeding—to include a proceeding before the Congress--or make an attempt to do so.

30. As such, I respectfully request that the court issue an arrest warrant for WATKINS.

The statements above are true and accurate to the best of my knowledge and belief.



SPECIAL AGENT MICHAEL M. PALIAN 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 16th day of January, 2021.



2021.01.16
15:17:32 -05'00'

ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

UNITED STATES OF AMERICA,	:	Case No. 3:21-MJ-23
	:	
Plaintiff,	:	Magistrate Judge Sharon L. Ovington
	:	
vs.	:	
	:	
JESSICA MARIE WATKINS,	:	
	:	
Defendant.	:	
	:	

REMOVAL AND COMMITMENT ORDER

This case came to be heard pursuant to [Fed. R. Crim. P. 5\(c\)\(3\)](#). Defendant herein was arrested in this District on a warrant issued upon an Amended Complaint in the United States District Court for the District of Columbia in Case No. 1:21-MJ-00119. Defendant appeared in open Court on January 19, 2021, and after being advised of her rights, waived her right to an identity hearing and detention hearing on the Government's Motion for Pretrial Detention. Defendant requested that a detention hearing and preliminary hearing be held in the District Court for the District of Columbia.

IT IS ORDERED THAT THE DEFENDANT BE REMOVED TO THE United States District Court for the District of Columbia, where the charges are pending against her, for any other proceedings, as ordered by that court.

TO THE UNITED STATES MARSHAL:

You are hereby commanded to take custody of the above-named Defendant and to transport that Defendant with a copy of this commitment forthwith to the district of offense as specified above and there deliver the Defendant to the United States Marshal for that District or to some other officer authorized to receive the Defendant, all proceedings required by Fed. R. Crim. P. 5 having been completed.

January 20, 2021

s/Sharon L. Ovington
Sharon L. Ovington
United States Magistrate Judge

CLOSED

**U.S. District Court
Southern District of Ohio (Dayton)
CRIMINAL DOCKET FOR CASE #: 3:21-mj-00023-SLO-1 *SEALED*
Internal Use Only**

Case title: USA v. Watkins
Other court case number: 1:21-mj-119 USDC District of
Columbia

Date Filed: 01/19/2021
Date Terminated: 01/20/2021

Assigned to: Magistrate Judge Sharon
L. Ovington

Defendant (1)

Jessica Marie Watkins
TERMINATED: 01/20/2021
also known as
Jessica Watkins
TERMINATED: 01/20/2021

represented by **Thomas W. Anderson**
Federal Public Defender
1 South Main Street
Fifth Third Center, Suite 490
Dayton, OH 45402
937-225-7687
Email: Thomas_Anderson@fd.org
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
*Designation: Public Defender or
Community Defender Appointment*

Pending Counts

None

Disposition

Highest Offense Level (Opening)

None

Terminated Counts

None

Disposition

Highest Offense Level (Terminated)

None

Complaints

18 U.S.C. § 371 - Conspiracy - 18
U.S.C. § 372 - Conspiracy to Impede or

Disposition


Injure Officer, 18 U.S.C. § 1361 -
 Destruction of Government Property.
 18 U.S.C. § 1512(c)(2) - Obstruction of
 an Official Proceeding, 18 U.S.C. §
 1752(a) - Restricted Building or
 Grounds, and 40 U.S.C. § 5104(e)(2) -
 Violent Entry or Disorderly Conduct



Plaintiff

USA

represented by **Dominick S. Gerace , II**
 United States Attorney's Office - 3
 PO Box 280
 200 W Second Street
 Room 602
 Dayton, OH 45402
 937-225-2910
 Email: dominick.s.gerace@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
Designation: Retained

Nicholas Dingeldein
 United States Attorney's Office
 200 W Second Street
 Room 602
 Dayton, Oh 45402
 937-225-2910
 Email: nicholas.dingeldein@usdoj.gov
ATTORNEY TO BE NOTICED
Designation: Retained

Date Filed	#	Docket Text
01/19/2021	1	COMPLAINT as to Jessica Watkins (1). (pb) (Entered: 01/19/2021)
01/19/2021	 2	Arrest Warrant Issued out of Washington D.C. in case as to Jessica Watkins. Signed by Magistrate Judge Zia M. Faruqui on 1/16/21. (pb) Modified on 1/19/2021 (pb). (Entered: 01/19/2021)
01/19/2021	3	Order to Seal Case as to Jessica Watkins. Signed out of Washington D.C. by U.S. District Judge Zia M. Faruqui, on 1/19/21. (pb) (Entered: 01/19/2021)
01/19/2021	<u>4</u>	MOTION for Pretrial Detention by USA as to Jessica Marie Watkins. (Dingeldein, Nicholas) (Entered: 01/19/2021)
01/19/2021	5	Amended COMPLAINT as to Jessica Marie Watkins. (pb) (Entered: 01/19/2021)

01/19/2021		Minute Entry for proceedings held before Magistrate Judge Sharon L. Ovington via GTM: Initial Appearance in Rule 5 Proceedings as to Jessica Marie Watkins held on 1/19/2021; AUSA Nicholas Dingeldein appeared on behalf of the Government via GTM; Defendant consented to appearing virtually as a result of the Coronavirus Pandemic; Defendant is unable to afford counsel; AFD Thomas W. Anderson, present via GTM, is appointed for Jessica Marie Watkins; rights and penalties explained and understood; CR Rule 5(f) statement regarding exculpatory evidence stated into the record by the Court; the Government is moving for pretrial detention; Defendant WAIVED her right to an Identity Hearing; Defendant reserves her right to Preliminary and Detention Hearings in the District of Columbia where charges are pending; the oral WAIVERS are ACCEPTED by the Court; Defendant will be transferred to D.C.; Defendant orally moved for a limited unsealing of the Complaint for Attorney's eyes only; no objection from the Government; GRANTED by the Court; Defendant is remanded to the custody of the US Marshal as to Jessica Marie Watkins. (Recorded By: CourtSmart, record number: 1:39-1:48/2:01-2:04) (rp) Modified on 1/20/2021 (rp). (Entered: 01/20/2021)
01/19/2021	 <u>6</u>	CJA 23 Financial Affidavit by Jessica Marie Watkins. (rp) (Entered: 01/20/2021)
01/19/2021	<u>7</u>	ORDER APPOINTING FEDERAL PUBLIC DEFENDER for Jessica Marie Watkins. Signed by Magistrate Judge Sharon L. Ovington on 1/19/21. (rp) (Entered: 01/20/2021)
01/20/2021	<u>8</u>	Due Process Protections Act Order as to Jessica Marie Watkins. Signed by Magistrate Judge Sharon L. Ovington on 1/20/21. (rp) (Entered: 01/20/2021)
01/20/2021	<u>9</u>	Order Regarding Use Of Video Conferencing as to Jessica Marie Watkins. Signed by Magistrate Judge Sharon L. Ovington on 1/20/21. (rp) (Entered: 01/20/2021)
01/20/2021	<u>10</u>	REMOVAL AND COMMITMENT ORDER: Defendant is ORDERED removed to the USDC, DOC where charges are pending against her as to Jessica Marie Watkins. Signed by Magistrate Judge Sharon L. Ovington on 1/20/21. (cc: USMS, D.C.) (rp) (Entered: 01/20/2021)
01/20/2021		(Court only) ***Case Terminated as to Jessica Marie Watkins, ***Terminated defendant Jessica Marie Watkins, pending deadlines, and motions. (rp) (Entered: 01/20/2021)