

STATEMENT OF FACTS

Your affiant, [REDACTED] is a Special Agent assigned with the Federal Bureau of Investigation ("FBI"). Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As an FBI Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of Federal criminal laws.

The U.S. Capitol 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 were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

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.

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.

At such time, the certification proceedings were 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, around 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.

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, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions 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 U.S. Capitol building without authority to be there.

Probable Cause Specific to Lilith Anton Saer

Following the January 6, 2021, breach of the U.S. Capitol, the Federal Bureau of Investigation (“FBI”) Portland Field Office received numerous tips concerning individuals believed to have entered the U.S. Capitol on January 6, 2021. On or about February 22, 2021, the Portland Field Office received numerous tips related to an individual inside of the U.S. Capitol, with blue hair named **Lilith Anton SAER**, a/k/a “Drakken Saer,” a/k/a “Ian Anton Coutu,” (“SAER”). SAER appeared to have distinguishable blue hair and was believed to be associated with QAnon. Your affiant knows that the QAnon theory is a wide-reaching conspiracy theory popular among a range of right-wing extremists.

The first investigative lead was from a tipster, referred herein as Tipster-1. Tipster-1 provided the FBI an open-source Twitter post made by a Twitter user with the handle name “@MichiganTea” on January 17, 2021. In the Twitter post, the individual believed to be SAER, is pictured standing in the middle of a hallway inside of the U.S. Capitol with blue hair and a black hooded sweatshirt. The caption to the photograph states: “Portland resident, Patriot Prayer member, & virulently antisemitic Qanon conspiracist Lilith Anton Saer (aka Drakken) . . . is visible in photos apparently taken inside the US Capitol on 1/6.” *See Image 1*. Tipster-1 stated that he/she personally knew SAER and had recently has contact with her.



Image 1

Your affiant began to investigate the individual known as “Lilith Anton Saer.” An open-source investigation revealed that “Lilith Anton Saer” was associated with a Twitter page with the Twitter handle name “@TheMontaukPill.” A photograph associated with “TheMontaukPill” with the aforementioned Twitter handle depicts a white female, with multicolored hair, distinguishable facial piercings, a large chest tattoo, and wearing a floral-patterned dress. *See Image 2.*



Image 2

When your affiant compared the photographs of the person depicted in *Images 1* and *Images 2*, it appeared that the individuals have similar facial piercings.

On January 19, 2021, FBI Portland received an additional tip from Tipster-2. Tipster-2 provided FBI with *Image 2*. According to Tipster-2, the individual in *Image 1* is known to him/her as “Portland Resistance” member, Lilith Saer of Portland, Oregon. Tipster-2 stated that he/she does not personally know Lilith Saer, but is familiar with the individual.

Based on the aforementioned tips and numerous tips that identified Lilith Saer as the individual in *Image 1*, the FBI used a number of investigative techniques to determine if **SAER** was inside of the U.S. Capitol. Initially, your affiant’s search did not yield a positive presence of the person believed to be **SAER** inside of the U.S. Capitol on January 6, 2021. However, an updated search for **SAER** was conducted recently in March 2022. As a result of the search, the person believed to be **SAER** was located outside of the U.S. Capitol amongst a crowd of rioters. *See Image 3.*



Image 3

In order to further confirm the identity of the person believed to be **SAER**, your affiant met with three individuals who know **SAER**. Each individual stated that he/she knew **SAER** and saw her on a routine weekly basis. The individuals were each shown pictures of the person believed to be **SAER**, including the person photographed in *Image 1*. After reviewing *Image 1* along with additional photographs, each of the individuals positively identified the individual in *Image 1* to be **SAER**.

Your affiant obtained an Oregon Department of Motor Vehicle driver's license of **SAER**. The individual pictured in the driver's license as Lilith Anton Saer has the same blue hair as the person identified in *Images 1* and *3*. After reviewing multiple images of the person believed to be **SAER** and comparing those images to the above-referenced driver's license, your affiant believes that **SAER** is one and the same as the person in *Images 1-3* who entered the U.S. Capitol on January 6, 2021.

Open-Source Videos

Your affiant gathered numerous open-source videos depicting **SAER**. In the first video, **SAER** identifies herself as "Drakken with a 'K.'" In my investigation, I confirmed that **SAER** uses an alias of "Drakken Saer." In the video, **SAER** is wearing gloves with a large "Q" on the fabric. Your affiant is familiar with the "Q" letter as a common reference to QAnon. **SAER** is depicted in the video with bright blue hair, wearing a black hooded coat, and a blue flag draped over her shoulders. *See Images 4.*

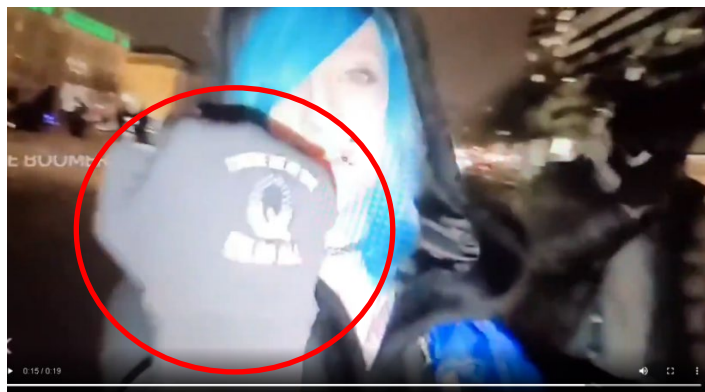


Image 4

In *Image 5*, a Twitter account with the handle name @Johnnthelefty, dated January 5, 2021, depicts the open-source video. The post accompanying the video states, “Look which Portland based Antisemite and #Qanon showed to #DCProtests to #StopTheSteal.” Your affiant noted that the post references that **SAER** is indeed from Portland, Oregon. Notably, your affiant noted that this post was made one day prior to the January 6 siege on the U.S. Capitol. The video confirms that **SAER** traveled to the District of Columbia and alludes that her arrival was to “StopTheSteal” a common reference used to reference the belief that the 2020 United States presidential election was stolen from former President Donald Trump. Additionally, “StopTheSteal” is a reference to the rally that former President Trump spoke at prior to the Capitol siege.

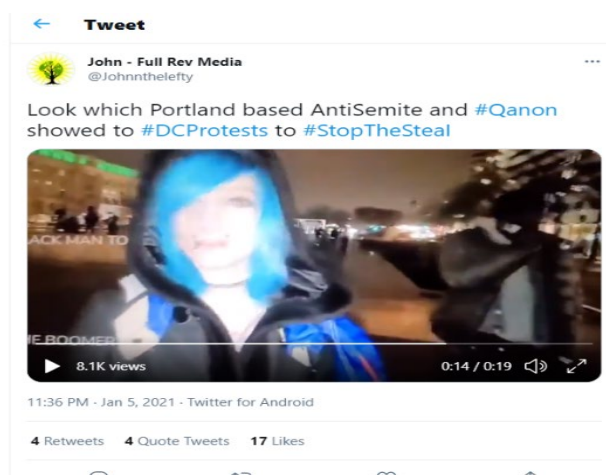


Image 5

Your affiant reviewed a second open-source video that was livestreaming on the website, LiveLeak.com. The video depicts **SAER** inside of the U.S. Capitol on January 6, 2021. The video is approximately 26 minutes in length. At approximately 5:17 seconds of the video **SAER** can be seen inside of the building, wearing the same attire worn in *Image 5*. Specifically, **SAER** appears to be wearing a black hoodie with a blue flag draped over her shoulders. See *Images 6-9*.

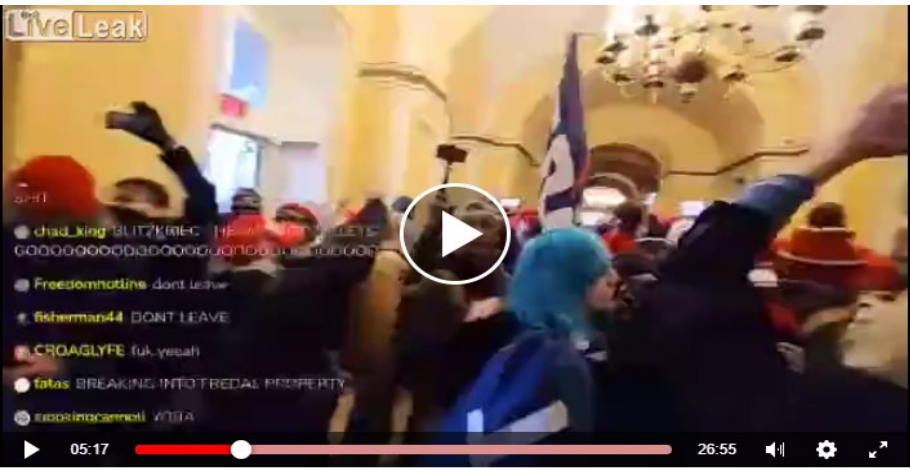


Image 6

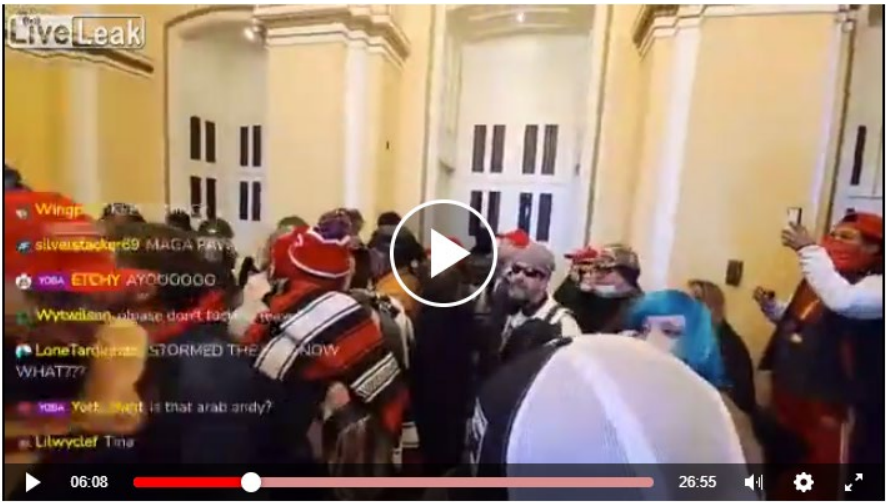


Image 7



Image 8



Image 9

Your affiant also reviewed a third open-source video in which **SAER** was interviewed by a reporter by the PSU Vanguard, a student newspaper for students at Portland State University. **SAER** is photographed with blue hair, wearing the same dress as she appears to wear in *Image 2*. Notably, your affiant also noted that **SAER** has the same tattoo, blue hair, and floral-patterned dress as featured in *Image 2*. **SAER** identified herself as “Drakken Saer” with an email address of shadowdrakken@protonmail.com.



Image 10

Closed Circuit Video from the U.S. Capitol

After identifying who I believed to be **SAER**, your affiant viewed Closed Circuit Video of rioters inside of the U.S. Capitol on January 6, 2021, in an effort to locate **SAER**. **SAER** was observed entering the building through the doorway of the Senate Wing section at approximately 2:56 p.m. See *Image 11*.

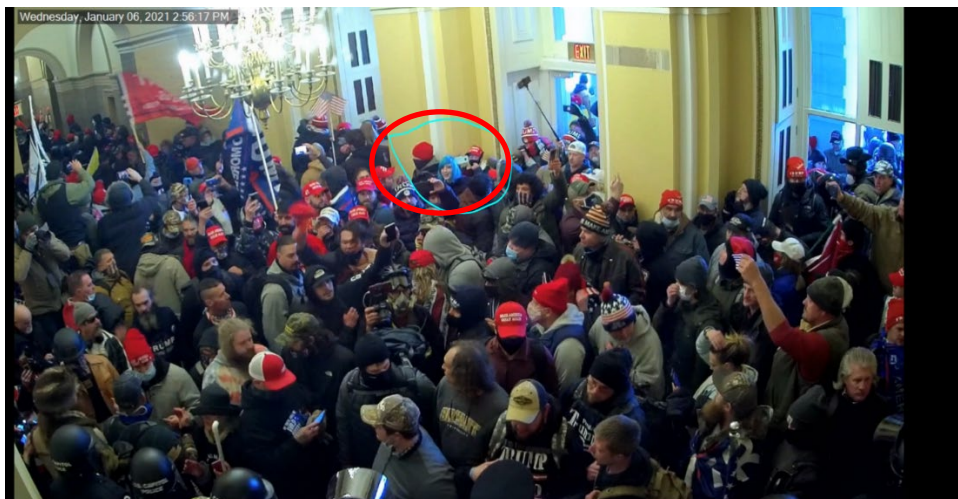


Image 11

After entering, **SAER** walked through the Senate Wing before walking to the House Wing of the building at approximately 3:01 p.m. See *Image 12*.

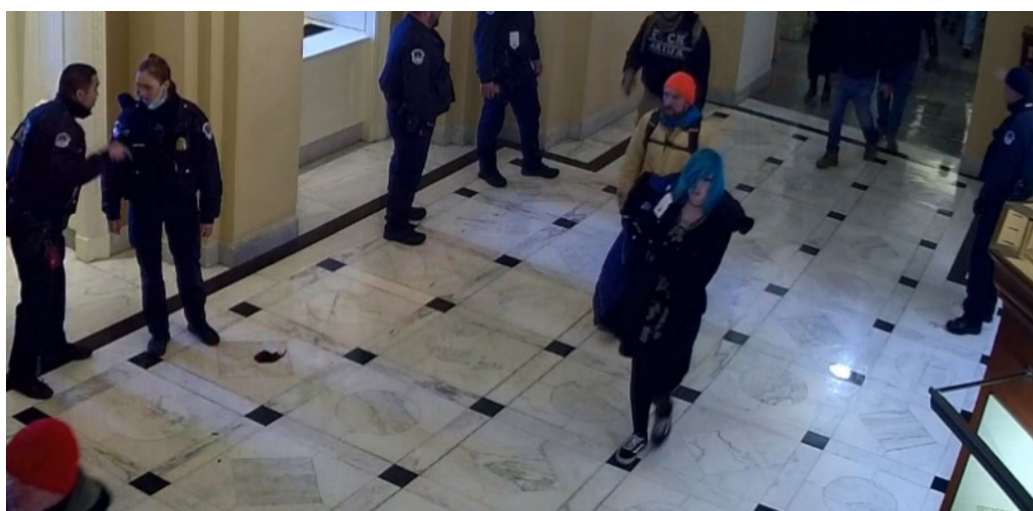


Image 12

At approximately 3:02 p.m., **SAER** was located walking through a hallway in the Hall of Columns section of the U.S. Capitol. See *Images 13 and 14*.

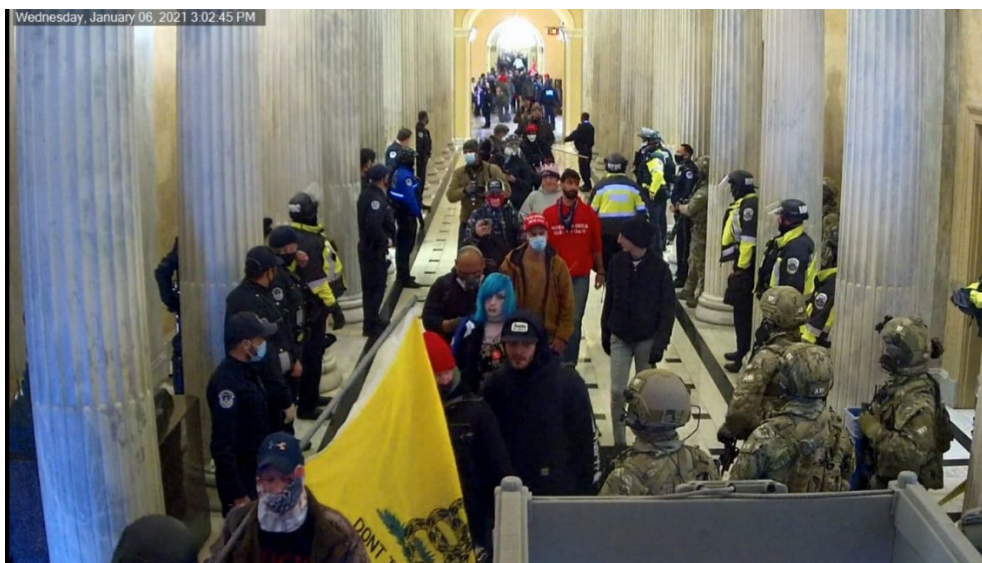


Image 13



Image 14

Notably, **SAER** was observed wearing the same floral-patterned dress that she is seen wearing in *Images 2 and 10*.

Your affiant also located a Getty Image in which **SAER** is observed holding a Trump 2020 flag. *See Image 15*. In the image, **SAER** appears to be attired in the same floral-patterned dress that she wore inside of the U.S. Capitol on January 6.



Image 15

Email Activity

According to records obtained by your affiant, the email address shadowdrakkeen@gmail.com is associated with **SAER**. Google Pay information provided for the email shadowdrakkeen@gmail.com came back addressed to “Ian Coutu.” Your affiant’s investigation revealed that **SAER**’s birth name is Ian Anton Coutu, although **SAER** commonly uses the alias “Drakken Saer.”

After reviewing IP activity associated with logins for the Google email account, open-source research shows shadowdrakkeen@gmail.com was assigned an IP address on January 6, 2021 located in Washington, D.C.

CONCLUSION

Based on the foregoing, your affiant submits that there is probable cause to believe that **Lilith Anton SAER**, a/k/a “Drakken Saer,” a/k/a “Ian Anton Coutu,” 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; 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 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 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.

Your affiant submits there is also probable cause to believe that **Lilith Anton SAER**, a/k/a “Drakken Saer,” a/k/a “Ian Anton Coutu,” violated 40 U.S.C. § 5104(e)(2)(D) and (G), 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; and (G) parade, demonstrate, or picket in any of the Capitol Bu



Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this _____ day of June 2022.

HONORABLE ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE