

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America

v.

Kevin Strong

Date of Birth: XXXXXXXX

Defendant(s)

) Case: 1:21-mj-00151

) Assigned to: Judge Zia M. Faruqui

) Assign Date: 1/21/2021

) Description: COMPLAINT W/ ARREST WARRANT

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 _____
in the District of Columbia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 1752 (a)(1)-Knowingly Entering or Remaining in any Restricted Building or Grounds
Without Lawful Authority

18 U.S.C. 1752(a)(2)-Knowingly Engaging in Disorderly or Disruptive Conduct in any Restricted
Building or Grounds

40 U.S.C. 5104(e)(2)(D), (G)-Violent Entry and Disorderly Conduct on Capitol Grounds

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.



Complainant's signature

Erin Norwood, Special Agent

Printed name and title

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

Date: 01/21/2021

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Judge's signature

Judge Zia M. Faruqui

Printed name and title

City and state: Washington, D.C.

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

I, Erin Norwood, being first duly sworn, hereby depose and state as follows:

PURPOSE OF THE AFFIDAVIT

1. This Affidavit is submitted in support of a criminal complaint and arrest warrant against Kevin Strong (hereinafter “STRONG”) charging violations of 18 U.S.C. § 1752(a)(1) and (2); and 40 U.S.C. §§ 5104(e)(2)(D) and (G).

BACKGROUND OF AFFIANT

2. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since October 2019. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of violations of Federal criminal laws.

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.

STATEMENT OF FACTS SUPPORTING PROBABLE CAUSE

4. 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.

5. 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.

6. 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.

7. 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, shortly 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.

8. 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.

9. 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.

10. On December 30, 2020, the FBI initiated an investigation of STRONG based on reporting from Witness #1 (“W-1”). W-1 is familiar with STRONG and his previous residence. W-1 told the FBI that STRONG had been showing signs of behavioral changes over the last few months including stock-piling items and telling others to get ready for Marshal Law, rioting, and protesting. Specifically, W-1 was aware that STRONG had sent messages to another individual claiming World War 3 is going to occur on January 6, 2021, and that the military was coming in and getting involved. W-1 was aware that STRONG hung a flag with the logo “WW1WGA” on his house. W-1 told the FBI that he/she looked it up on the Internet and found that that “WWG1WGA” was a QAnon slogan standing for “Where We Go One, We Go All.” STRONG was known to declare that he had “Q clearance” and believed he was part of a “movement” that was greater than himself. He had recently purchased a new truck and believed that QAnon would cover the debt. STRONG had also been promoting the “Parler” application as a place to get information.

11. STRONG is currently employed by the Federal Aviation Administration (FAA) in San Bernardino, California. On January 7, 2021, an employee in the Internal Investigations Branch of the FAA contacted the FBI and reported STRONG was observed at the United States

Capitol building during the unlawful entry that took place on January 6, 2021. According to the FAA employee, STRONG was seen on a news broadcast.¹ The employee provided a screengrab from the news broadcast to law enforcement.



12. On January 12, 2021, the FBI conducted an interview of Witness #2 ("W-2"). W-2 is familiar with STRONG and identified STRONG in four photographs—including one inside the U.S. Capitol. W-2 also stated than another individual had sent W-2 a video clip of STRONG in the U.S. Capitol with the message "Kevin's on TV!"

13. Numerous media outlets and photographers obtained photos of STRONG and individuals present in the U.S. Capitol building after the breech of security. STRONG was captured by a photographer in the rotunda of the U.S. Capitol building. Your affiant notes that

¹ <https://www.cnn.com/2021/01/07/opinions/unprepared-or-unwilling-police-failed-at-the-us-capitol-alexander/index.html>

STRONG, below in the grey jacket and red hat, is particularly identifiable in photos due to his height (approximately 6'6"-6'7").



14. On January 16, 2021, FBI agents served a State of California search warrant and Gun Violence Restraining Order (GVRO) on STRONG at his current residence in Beaumont, CA. Two firearms were taken from the residence. The firearms legally belonged to STRONG's uncle, who could not properly secure them from getting into STRONG's possession. A number of digital devices were also seized—including STRONG's personal cell phone. QAnon paraphernalia was also photographed and one QAnon flag was seized.

15. Additionally, STRONG was interviewed regarding his activity inside of the United States Capitol building on January 6, 2021. STRONG confessed to being in the U.S. Capitol rotunda following the breach. He initialed and dated the photos in which he was identified inside of the Capitol, confirming he was the individual depicted. STRONG then proceeded to show the

interviewing agents the captured news broadcast of him inside of the Capitol, which he kept on his personal cellphone. STRONG provided the hat he is seen wearing the news broadcast. The hat was photographed by the FBI search team. Of his own volition, STRONG provided photos and videos he took from within the Capitol, on his personal cellphone. STRONG admitted that he took a “selfie” in front of the Office of the Speaker of the House, which he deleted prior to January 16, 2021. While at the Capitol, STRONG met another individual whom he can be seen conversing with *inside* of the Capitol via the news broadcast video. STRONG clarified that he did not do any damage or attack law enforcement.

16. When asked why he went to Washington D.C., STRONG explained that he went to see Trump speak and walk in the “Million MAGA March.” STRONG adheres strongly to QAnon ideology, admitting to having “Q Clearance”. According to STRONG, January 18, 2021, is an important date according to QAnon doctrine and that the new one-party system, was coming: “The Patriot Party.” The “Patriot Party” flag was photographed by the FBI search team.

17. Based on the foregoing, your affiant submits that there is probable cause to believe that STRONG violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do so; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions.

18. Your affiant submits there is also probable cause to believe that STRONG 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 Buildings.

Erin Norwood

Special Agent Erin Norwood
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 21st day of January 2021.

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ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE