

STATEMENT OF FACTS

1. Your Affiant, [REDACTED], is a Special Agent with the Federal Bureau of Investigation (FBI) and is assigned to the Joint Terrorism Task Force (JTTF) with the FBI Pittsburgh Division in Pittsburgh, PA. Your Affiant is tasked with investigating criminal activity in and around the United States Capitol (Capitol) grounds in Washington, D.C. on January 6, 2021. Your Affiant has served as a Special Agent with the FBI since 2018. Prior to that time, your affiant served as a Special Agent with U.S. Secret Service for 9 years. As a Special Agent with the FBI, your Affiant is 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.
2. The Capitol is secured 24 hours a day by United States Capitol Police. Restrictions around the Capitol include permanent and temporary security barriers and posts manned by Capitol Police. Only authorized persons with appropriate identification are allowed access inside the Capitol. On January 6, 2021, the exterior plaza of the Capitol was closed to members of the public.

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

3. 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.
4. 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.
5. 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.
6. 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.

7. 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.

Evidence Linking ARCHER and BONENBERGER to Assault on the U.S. Capitol

8. Among the images of individuals who entered the U.S. Capitol without authority was an individual dressed in black clothing, carrying a multi-colored drawstring backpack, and wearing a white open topped knitted winter-style hat. As described below, that person has been identified as Melanie ARCHER (ARCHER). Also, among the images of individuals who entered the U.S. Capitol was an individual dressed in blue jeans, a black jacket with a light colored logo on the left side of the chest, a dark colored hooded sweatshirt underneath, a red hat with discernible writing and black facemask. As described below, that person was identified as Jordan BONENBERGER (BONENBERGER). Through FBI Pittsburgh's investigation as detailed below, those individuals (ARCHER and BONENBERGER) were determined to be residents of the Western District of Pennsylvania.

Video

9. Following the events at the U.S. Capitol on January 6, 2021, FBI employees have conducted a review of surveillance camera footage obtained from security cameras located inside the Capitol, as well as body camera footage from the Metropolitan Police Department. In the course of this review, individuals matching the description of and known images of ARCHER and BONENBERGER can be seen walking throughout multiple locations inside the Capitol together and at times separately. The following does not represent an exhaustive analysis of all available surveillance footage, but rather a summary of ARCHER and BONENBERGER's movement through the Capitol.



**BONENBERGER entry - West-side-central doors;
Approx. time 14:38 hrs / 2:38 pm EST**



**ARCHER entry - West-side-central doors;
Approx. time 14:44 hrs / 2:44 pm EST**



**BONENBERGER & ARCHER in Rotunda;
Approx. time 19:45 hrs UTC / 2:45 pm EST**



**BONENBERGER & ARCHER in Rotunda;
Approx. time 19:46 hrs UTC / 2:46 pm EST**



**BONENBERGER & ARCHER in West Corridor;
Approx. time 19:55 hrs. UTC / 2:55 pm EST**



**BONENBERGER & ARCHER move to exit West-side-central doors;
Approx. time 14:56 hrs / 2:56 pm EST**



**BONENBERGER & ARCHER exit. West-side-central doors;
Approx. time 14:57 hrs / 2:57 pm EST**



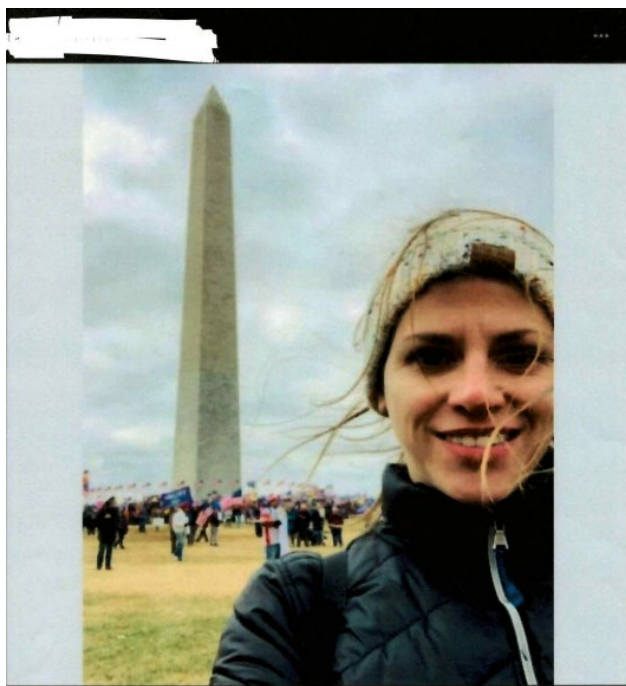
**BONENBERGER & ARCHER on Western Exterior Stairs;
Approx. time 15:06 hrs / 3:06 pm EST**

Witness (W-1) Identification of ARCHER and BONENBERGER

10. On July 13, 2021, FBI Pittsburgh contacted an individual, W-1, who has known ARCHER for a significant period of time and who is also familiar with BONENBERGER. On a previous occasion, W-1 had affirmed that he/she was aware that ARCHER had traveled to Washington, D.C., on January 6, 2021, with BONENBERGER. According to W-1, ARCHER has admitted to entering the U.S. Capitol. FBI Pittsburgh presented W-1 with photos of ARCHER and BONENBERGER at the U.S. Capitol and inside the U.S. Capitol. Given the quality of the screen shots from the interior of the U.S. Capitol, W-1 did not express 100% certainty on his/her identification for every image of ARCHER and BONENBERGER in the interior of the U.S. Capitol, but he/she explained that he/she was 60-70% sure that it was ARCHER and BONENBERGER for some images (inside the U.S. Capitol) and very confident that it was ARCHER and BONENBERGER in other images outside the U.S. Capitol in the U.S. Capitol area wearing the same clothing. See images below identified by W-1 and the percentage of certainty for each photo/Subject:



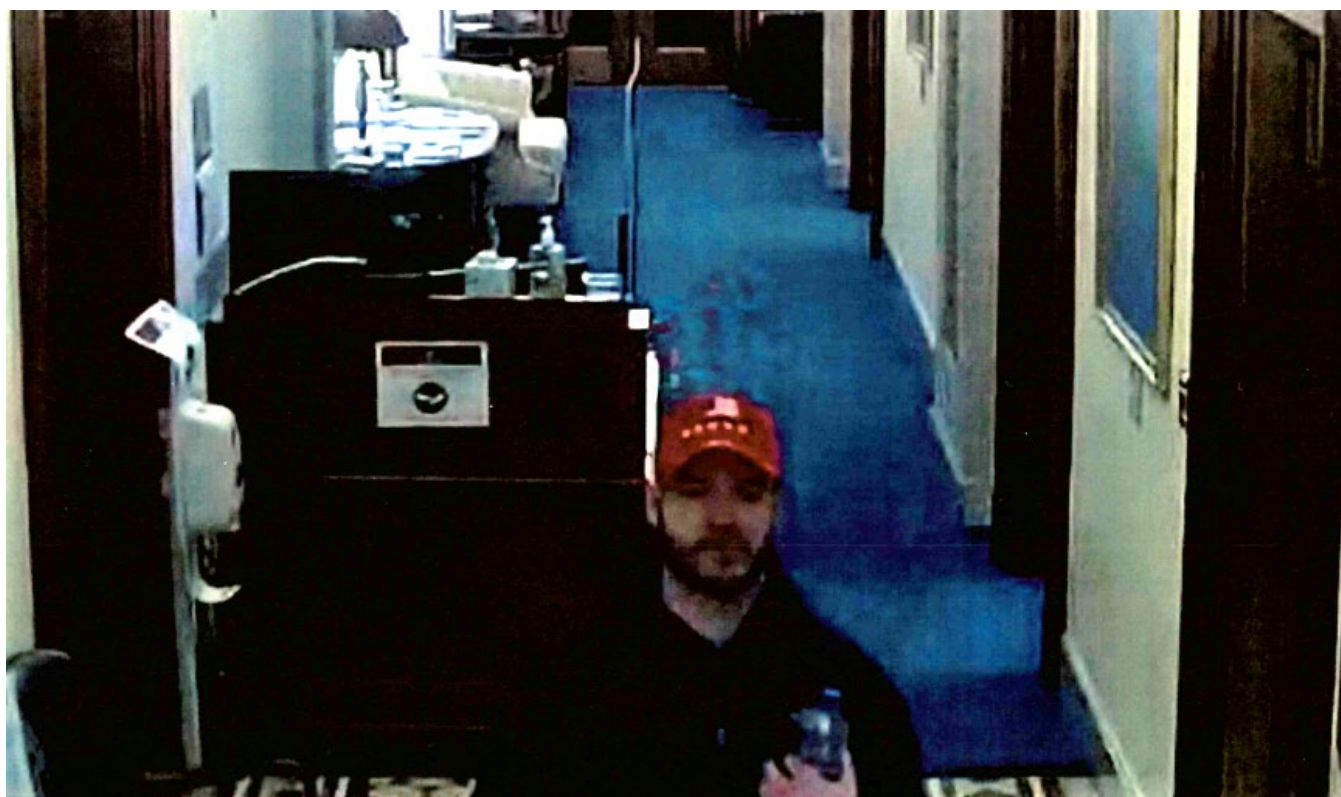
W-1 stated a 100% certainty that the man in the red hat was JORDAN BONENBERGER



W-1 stated a 100% certainty that the woman in white hat was MELANIE ARCHER



W-1 stated a 60-70% certainty that the woman in the white hat was **MELANIE ARCHER**



W-1 stated a 60-70% certainty that this image is of **JORDAN BONENBERGER**



W-1 stated a 90% certainty that the woman in white hat was **MELANIE ARCHER** and the man in the red hat was **JORDAN BONENBERGER**



W-1 stated a 90% certainty that the woman in white hat was MELANIE ARCHER and the man in the red hat was JORDAN BONENBERGER

Witness (W-2) Identification of BONENBERGER

11. On January 8, 2021, the FBI received an online tip from a complainant, W-2, who knew BONENBERGER from college-age who said that he/she saw videos of BONENBERGER on Snapchat outside the U.S. Capitol on January 6, 2021. W-2 provided the FBI with BONENBERGER's cellular telephone number, 412-651-7536. During a subsequent interview on January 19, 2021, W-2 provided the FBI with BONENBERGER'S Facebook account information (www.facebook.com/jordan.staab.90) and Snapchat account username "Jordan B". W-2 also stated that BONENBERGER was at the Capitol with an unidentified female. FBI Pittsburgh and the USAO issued process to Verizon, Facebook, and Snapchat, confirming BONENBERGER as the subscriber of the aforementioned accounts.
12. On May 20, 2021, W-2 responded to follow-up questions from the FBI regarding photographs of BONENBERGER inside and outside the Capitol building. While W-2 affirmed that BONENBERGER was in fact the individual in the photos from the exterior of the Capitol, W-2 did not or would not conclusively identify BONENBERGER as the individual in the photos from CCTV in the interior of the Capitol. W-2 stated that he/she had only originally seen images of BONENBERGER from the exterior of the Capitol, on BONENBERGER'S Snapchat account. However, W-2 did point out that the individual that he/she identified as BONENBERGER in the pictures from outside of the Capitol was wearing the same clothing as the person depicted in the pictures inside of the Capitol. See images below identified by W-2:



Picture 1: W-2 identified this picture as being JORDAN BONENBERGER's Facebook profile picture.



Picture 2: W-2 was unsure who this person was.



Picture 3: W-2 was unsure who this person was.



Picture 4: W-2 identified JORDAN BONENBERGER in this photograph.



Picture 5: W-2 identified JORDAN BONENBERGER in this photograph.



Picture 6: W-2 identified JORDAN BONENBERGER in this photograph.

Further Investigative Activity

13. On January 29, 2021, FBI Pittsburgh contacted BONENBERGER via Verizon cellular telephone number 412-651-7536 in an effort to set up an interview, to which BONENBERGER initially agreed. On February 3, 2021, when agents arrived at his home, BONENBERGER granted access to FBI agents, but ultimately declined to be interviewed. FBI agents made an additional attempt to speak to BONENBERGER on July 12, 2021, to obtain his version of events, but he again declined. During the attempted interview on July 12, 2021, FBI-Agents visually confirmed JORDAN BONENBERGER to match the likeness of the images identified by W-1 and W-2 to be BONENBERGER.
14. According to records obtained from Verizon, cellular number 412-651-7536, the same number that the FBI has used to contact BONENBERGER, registered inside the U.S. Capitol building for approximately 15 minutes on January 6, 2021.
15. The FBI received tips from multiple complainants who knew ARCHER personally and reported that ARCHER has told people that she was inside the U.S. Capitol on January 6, 2021. Complainants also reported that ARCHER intimated on social media that she was “IN that...a part of that,” referring to the U.S. Capitol events. FBI attempted to interview ARCHER regarding her presence in the U.S. Capitol on January 6, 2021. She declined to be interviewed.

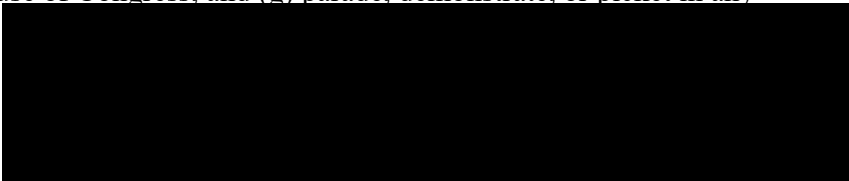
16. The aforementioned images identified by W-1 and W-2 to be BONENBERGER and ARCHER together on the exterior of the U.S. Capitol building match the likeness and description, to include a clothing match, of the individuals together on the interior of the U.S. Capitol.



17. Based on the aforementioned evidence, there is probable cause to believe that ARCHER and BONENBERGER were present inside the Capitol on January 6, 2021, during the riot and related offenses that occurred at the U.S. Capitol Building, located at 1 First Street, NW, Washington, D.C., 20510 at latitude 38.88997 and longitude -77.00906 on January 6, 2021 and participated in the obstruction of the Congressional proceedings.
18. Accordingly, your affiant submits that there is probable cause to believe that ARCHER and BONENBERGER 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.

19. Your affiant further submits that there is probable cause to believe that ARCHER and BONENBERGER 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.



Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 14th day of March 2022.

HONORABLE ROBIN M. MERIWEATHER
UNITED STATES MAGISTRATE JUDGE