

STATEMENT OF FACTS

Your affiant, [REDACTED] has been a Special Agent of the Federal Bureau of Investigation (FBI) since January 2005. I am currently assigned to the Joint Terrorism Task Force (JTTF) in the FBI Baltimore Division, where I focus on domestic terrorism including investigating criminal activity in and around the Capitol grounds on January 6, 2021. As an FBI agent, I am authorized by law or by a government agency to engage in or supervise the prevention, detention, 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, 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.

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.

STACY BOND first came to the attention of the FBI after it obtained records from Google through a search warrant indicating a mobile device associated with BOND was within the restricted area on the northern and western portion of the U.S. Capitol Building on the afternoon of January 6, 2021. The FBI received a tip that BOND had claimed to be at the Capitol on January 6, 2021. The FBI reviewed publicly available photographs in July of 2021 of BOND on BOND's Facebook page and obtained BOND's Maryland Driver's License photograph. In addition, a picture BOND posted on his Facebook page in May of 2020 strongly resembled his Driver's License photograph.

Then, in September and October 2021, the FBI reviewed body camera footage (BWC) from January 6, 2021 that the Metropolitan Police Department (MPD) had made available to the FBI. A review of this MPD body camera footage revealed numerous clips of an individual outside the U.S. Capitol matching BOND's physical appearance. A comparison of BOND's driver's license photograph and photographs from BOND's Facebook page with the BWC footage of the male individual in the below photographs appear to depict the same person. In the screenshot below, captured in BWC from approximately 4:22 pm to 4:23 pm on January 6, 2021 on the Upper West Terrace area, BOND was directly in front of a physical altercation between police and protestors:



Review of MPD body camera footage also revealed that, throughout the afternoon of January 6, 2021 while on restricted Capitol grounds, BOND was with PAULA CONLON. Below they are depicted on BWC on the Upper West Terrace at approximately 2:50 pm:



The FBI reviewed publicly available photographs of CONLON on CONLON’s Facebook profiles on January 21, 2022 and obtained CONLON’s Maryland Driver’s License photograph, and these photographs of CONLON appear to depict the same person as the woman in the above photographs.

In the fall of 2021, the FBI also spoke with two witnesses (Witness #1 and Witness #2) who both stated that BOND had been at the U.S. Capitol Building on January 6, 2021 and had witnessed or been involved in some sort of altercation with law enforcement officers that afternoon.

In December 2021, the FBI obtained search warrants for BOND’s Facebook and Google accounts. BOND’s Facebook account included numerous images from the exterior of the Capitol Building on January 6, 2021. The review of the data received revealed a private message sent by BOND on January 6, 2021 which said:

“I got there right after they broke in, I was pretty pissed, but I went in there just to go in and out the front door and got maced”.

BOND’s Google account data included photographs of the inside of the Capitol Building on January 6, 2021 that, according to the United States Capitol Police (USCP), appear to have been taken from the vicinity of the Senate Wing Door by S 139, including the images below. The image on the right shows the interior of S 140, an office used by Senator Jeff Merkley:



The FBI reviewed Capitol Building CCTV footage from January 6, 2021 and observed the above individuals resembling BOND and CONLON enter the Capitol Building at approximately 20:10 UTC (3:10 p.m.) through a broken out window next to the Senate Wing Door. BOND and CONLON walked through the lobby/hallway area before walking back outside the Senate Wing Door at approximately 20:13 UTC (3:13 p.m.) Relevant screen shots from the CCTV footage are included below:





In February 2022, the FBI met with Witness #3, who personally knows CONLON and was confident he/she could identify CONLON by her physical appearance or her voice. The FBI showed Witness #3 several photographs/screenshots and a video clip from BWC of CONLON in which CONLON told law enforcement officers to “back off.” A screen shot of that clip taken on the Upper West Terrace is below:



Witness #3 confirmed that the person in the screenshots and video was CONLON.

In April 2022, the FBI obtained a search warrant for CONLON’s Facebook account, which contained a significant amount of content and communications regarding the belief that the 2020 Presidential election had been stolen or fraudulent, and the account made several references to the upcoming rally on January 6, 2021, that “should be epic.” However, CONLON’s public activity on Facebook largely ceased on January 5, 2021, and the records suggest that she temporarily deactivated her account on or soon after January 6, 2021.

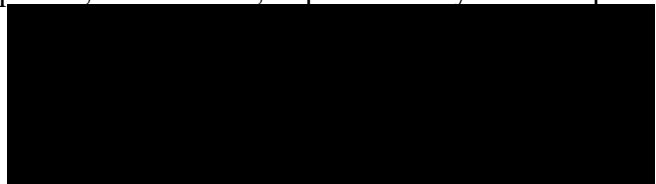
In April 2022, the FBI showed the following screen shots to Witness #2, who positively identified the person in the pictures as Bond:



Based on the foregoing, I submit that there is probable cause to believe that STACY BOND and PAULA CONLON 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.

I also submit there is also probable cause to believe that STACY BOND and PAULA CONLON 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.



Federal Bureau of Investigation

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

HON. ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE