Assigned To: Magistrate Judge Zia M. Faruqui

Assign. Date: 6/9/2022

Description: Complaint with Arrest Warrant

## STATEMENT OF FACTS

Your affiant, Special Agent with the Federal Bureau of Investigation ("FBI") is assigned to the Joint Terrorism Task Force (JTTF) in Baltimore, MD. In my duties as a special agent, I investigate criminal violations related to Domestic Terrorism. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a 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 are 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 U.S. Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the U.S. House of Representatives and the U.S. Senate were meeting in separate chambers of the U.S. 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 House and the 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 U.S. Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the U.S. 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.

On January 6, 2021, a tipster submitted a tip to the FBI National Threat Operations Center regarding an Alaska resident named Aaron James Mileur. According to the tipster, Mileur posted photos and video footage of himself inside the U.S. Capitol Building on Facebook from January 6, 2021. FBI agents interviewed the tipster and obtained screenshots of the Facebook photos and videos of Mileur inside the U.S. Capitol building. Among these photos was a Facebook post depicting Mileur (on the right) with two other individuals with the caption "Carrie Williams is with Aaron Mileur." The screenshot is provided below:

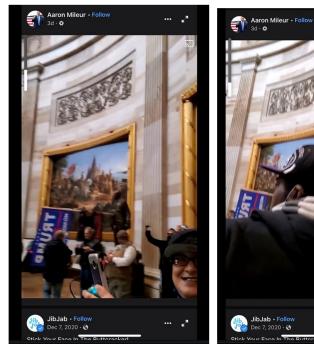


As explained below, I believe the individual in the center of the photograph above, a woman wearing a black baseball cap, black thick-rimmed glasses, and a black hooded sweatshirt, is CARRIE ANN WILLIAMS. Further, I believe the individual on the left, a man with a thin mustache wearing a black and purple Baltimore Ravens hat, a black-and-white striped hood, and a black sweatshirt, is TYRONE MCFADDEN JR. In statements to law enforcement, described further below, both WILLIAMS and Mileur stated that they were cousins. Furthermore, both WILLIAMS and MCFADDEN stated that they both resided at "1001 Cherry Hill Road" in Baltimore, Maryland and were engaged.

I have reviewed photos and video footage showing Mileur, WILLIAMS, and MCFADDEN together inside and around the U.S. Capitol building on January 6, 2021. For example, a video taken by a member of the crowd and obtained through an online FBI tip system shows an individual wearing what appears to be the same black baseball cap, black thick-rimmed glasses, and black hooded sweatshirt shown above, and who appears similar to the woman in Mileur's Facebook post, approaching the east side of the Capitol Building. The below screenshot shows that individual, who I believe to be WILLIAMS, in the foreground, circled in red.



As another example, among the materials provided by the tipster was a video the tipster reported had been posted to Mileur's Facebook account, which also shows the individuals believed to be WILLIAMS and MCFADDEN inside the U.S. Capitol Building. Based on my review of the video, it is believed that the footage was taken inside the Rotunda, the ceremonial heart of of the U.S. Capitol. In that video, with screenshots excerpted below, WILLIAMS appears to be using her cell phone to record the events inside the Capitol, and MCFADDEN can be seen with her.

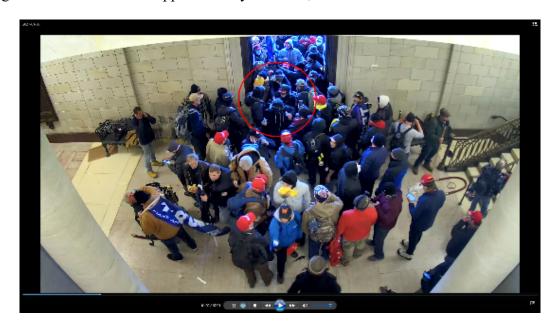






Google records corroborate that WILLIAMS and MCFADDEN were present inside the U.S. Capitol Building on January 6, 2021. According to records obtained through a search warrant which was served on Google, mobile devices associated with the Google accounts cwXXXX@gmail.com, which is registered to WILLIAMS, and tyXXXX@gmail.com, which is registered to MCFADDEN, each utilized a cell site consistent with providing service to a geographic area that included the interior of the U.S. Capitol building on January 6, 2021.

I have also reviewed security camera footage (CCV) from inside the Capitol on January 6, 2021. This video footage shows Mileur, MCFADDEN, and WILLIAMS entering the U.S. Capitol through the Rotunda Door at approximately 2:46 PM, as shown in the screenshot below:

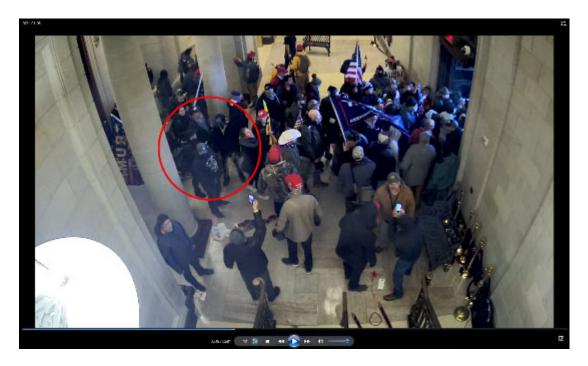


Other CCV video from inside the U.S. Capitol show WILLIAMS, MCFADDEN, and Mileur inside the Capitol Rotunda. The video shows WILLIAMS, MCFADDEN, and Mileur in the Rotunda area from approximately 2:47 PM through 2:50 PM. Screenshots from the videos are provided below. Based on my review of this footage, it appears to show the same area captured by Mileur's Facebook video provided by the tipster.

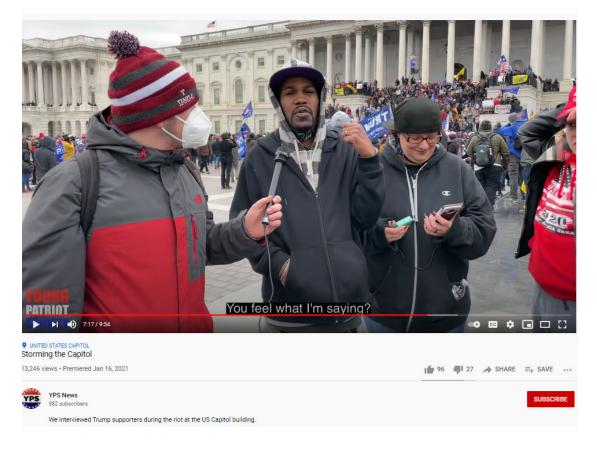




WILLIAMS, MCFADDEN, and Mileur are seen on video near the Rotunda Lobby and subsequently exiting the Rotunda Door at approximately 2:51 PM. A screenshot of the video is provided below:



I have reviewed a ten-minute YouTube video, posted by the Young Patriots Society, and available at https://www.youtube.com/watch?v=LeRYX4LOzYw, entitled "Storming the Capitol," with the caption, "We interviewed Trump supporters during the riot at the US Capitol Building." In this video, WILLIAMS and MCFADDEN, along with two other individuals, can be seen speaking to an interviewer beginning at approximately 7:07 minutes, as shown below.



The individual next to WILLIAMS reported, "We were definitely within the first 100-150 people to get in that building," to which WILLIAMS responded, "Yeah, we were too, we definitely were too." MCFADDEN then stated, "They were going to lock us in there, you know what I'm saying? They bombed us twice." At the conclusion of the interview, WILLIAMS stated, "We made it out safe. We're good. We made history. We was not expecting this mess at all today. But we did it. We're here. We're still alive, we're still kicking."

On March 9, 2021, WILLIAMS and MCFADDEN together were telephonically interviewed by an FBI agent. They reported that they went to D.C. with Mileur on January 6, 2021. WILLIAMS and MCFADDEN denied ever going into the U.S. Capitol Building but said that they were close enough to see inside. Based on the video footage described above, I believe this was false and that WILLIAMS and MCFADDEN were untruthful in that interview.

Mileur was arrested in March 2021 for his participation in the riot at the U.S Capitol on January 6. Mileur was interviewed by the FBI as part of the investigation. After being advised of his *Miranda* rights, Mileur advised that he went to Washington, DC on January 6, 2021 with MCFADDEN and WILLIAMS so he could hear President Trump speak. He also stated that MCFADDEN, WILLIAMS and himself were inside the U.S. Capitol building.

According to Facebook records, WILLIAMS is registered as Facebook user "Carrie Williams," with the username "mzcarriebabie1979," currently living in Baltimore, Maryland. The account is registered to the same Google email address referenced above, cwXXXX@gmail.com, which is registered to WILLIAMS, and the same cell phone number which Google records

indicate, as noted above, was present inside the U.S. Capitol building on January 6, 2021. I have reviewed records from WILLIAMS' and Mileur's Facebook accounts. WILLIAMS' account includes multiple posts with photographs of WILLIAMS, MCFADDEN, and Mileur in Washington, DC and near the U.S. Capitol on January 6, 2021. Some examples of mobile uploads by WILLIAMS on January 6, 2021, at the times noted, are shown below:



WILLIAMS's Facebook account also includes conversations with others, both before and after the events of January 6, about the riot. For example, on February 8, 2021, one of WILLIAMS's Facebook contacts asked, "Wtf did you turn Tyrone [MCFADDEN] into? He fell completely apart even more" and "Why yall down there representing Trump. He list all his mind." WILLIAMS responded with "His mind is just fine my cousin was here visiting and he qant to see trump speak then all hell broke loose not cuz of us [sic]."

The Facebook records also reveal conversations between WILLIAMS and Mileur. On December 7, 2020, WILLIAMS provided Mileur with her address, confirming that she then resided at the apartment on Cherry Hill Road in Baltimore, Maryland. Public records databases confirm that MCFADDEN resided at the same address as of July 2020, which is also the address he reported to the FBI in the March 2021 telephonic interview. In addition, I have reviewed the driver's licence photograph and a booking photograph of MCFADDEN taken incident to an April 2016 arrest, shown below, which resembles photos of MCFADDEN obtained from the Facebook pages of WILLIAMS and Mileur and the video evidence discussed above.



2016 Booking photo of MCFADDEN



January 6, 2021, photo uploaded to WILLIAMS's Facebook account

Based on all of this evidence, I believe WILIAMS and MCFADDEN are the same individuals shown in numerous photos and videos traveling to and around the U.S. Capitol on January 6.

The very next day after the riot, on January 7, 2021, WILLIAMS and Mileur discussed the possible consequences of their actions and described taking down their Facebook posts. They had the following exchange through Facebook:

WILLIAMS: So the news said the government wants people to turn over any

videos of people who stormed the capital

Mileur: Dont WILLIAMS: Im not lol

Mileur: Have u taken it down yet

WILLIAMS: Yes

[...]

WILLIAMS: Still had a blast but calling us domestic terrorist

Mileur: I noticed

WILLIAMS: Im not taking the pics down though

Based on the foregoing, your affiant submits that there is probable cause to believe that CARRIE ANN WILLIAMS and TYRONE MCFADDEN Jr. 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 CARRIE ANN WILLIAMS and TYRONE MCFADDEN Jr. 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 10th day of June 2022.

ZIA M. FARUQUI U.S. MAGISTRATE JUDGE