

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.

Riley June Williams

Date of Birth: XXXXXXXX

Defendant(s)

Case: 1:21-mj-00099

Assigned to: Judge Robin M. Meriweather

Assign Date: 1/17/2021

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 USC 1752(a)(1) Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority

40 USC 5104(e)(2) 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.

Handwritten signature of Jonathan M. Lund

Complainant's signature

Jonathan M. Lund, 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: 01/17/2021

Judge's signature

Robin M. Meriweather

United States Magistrate Judge

Printed name and title

City and state: Washington D.C.

STATEMENT OF FACTS

1. Your affiant, Jonathan Lund is a Special Agent of the Federal Bureau of Investigation (“FBI”) in the Manassas, Virginia, office, in the Cyber Crime Section. Since 2009, I have been involved in interviewing and debriefing witnesses and informants; conducting physical surveillance; tracing and analyzing internet protocol addresses; tracing and analyzing financial transactions; analyzing telephone pen registers; collecting and analyzing evidence; and preparing and executing search warrants. I have received organizational sponsored computer training as well as computer training at the SANS institute. I have also received training in the area of computer security and network administration. 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 a violation of Federal criminal laws.

Background – The U.S. Capitol on January 6, 2021

2. The U.S. Capitol, which is located at First Street, SE, in Washington, D.C., 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.

3. On January 6, 2021, the exterior plaza of the U.S. Capitol was 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.

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 approximately 2:00 p.m., certain individuals in the crowd forced their way through, up, and over the barricades, and officers of the U.S. Capitol Police, and the crowd advanced to the exterior façade of the building. The crowd was not lawfully authorized to enter or remain in the building and, prior to entering the building, no members of the crowd submitted to security screenings or weapons checks by U.S. Capitol Police Officers or other authorized security officials.

6. 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 after 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.

7. 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, all proceedings of the United States Congress, including the joint session, were effectively suspended until shortly after 8:00 p.m. the same day. In light of the dangerous circumstances caused by the unlawful entry to the U.S. Capitol, including the danger posed by individuals who had entered the U.S. Capitol without any security screening or weapons check, Congressional proceedings could not resume until after every unauthorized occupant had left the U.S. Capitol, and the building had been confirmed secured. The proceedings resumed at approximately 8:00 pm after the building had been secured. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the session resumed.

8. 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.

RILEY JUNE WILLIAMS

9. In the days following the January 6, 2021, events, a witness (“W1”) made several phone calls into the FBI’s telephone tip line related to the U.S. Capitol attacks. I have reviewed documentation of several of those calls. In them, the caller stated that he/she was the former romantic partner of RILEY JUNE WILLIAMS (“WILLIAMS”), that he/she saw WILLIAMS depicted in video footage taken on January 6, 2021, from inside the U.S. Capitol Building. W1 stated that WILLIAMS can be seen directing crowds inside the U.S. Capitol Building up a staircase. The caller specified the uniform resource locator (“url”) for a YouTube video that he/she was describing as url: <https://youtube.com/watch?v=jJiSmVkty4&feature=youtu.be>. W1 also claimed to have spoken to friends of WILLIAMS, who showed W1 a video of WILLIAMS taking a laptop computer or hard drive from Speaker Pelosi’s office. W1 stated that WILLIAMS intended to send the computer device to a friend in Russia, who then planned to sell the device to SVR, Russia’s foreign intelligence service. According to W1, the transfer of the computer device to Russia fell through for unknown reasons and WILLIAMS still has the computer device or destroyed it. This matter remains under investigation.

10. I have reviewed a publicly available video that was posted on YouTube located at the url <https://youtube.com/watch?v=jJiSmVkty4&feature=youtu.be>. It is a 32-minute long video, with audio, and consists of a video report called “Storming the Capitol: The Inside Story,” from ITV News, a British television network. I believe that this video report was both posted on YouTube and published in other media formats. At or about 20 minutes and 40 seconds into the video, there appears at the bottom of a staircase the subject, believed to be WILLIAMS, a Caucasian female wearing a green t-shirt and brown trench coat and carrying a black-and-white

striped zebra-print bag over her shoulders. She has brown shoulder length hair and wears eyeglasses. She is wearing a black face mask below her chin, around her neck. She can be heard in the video repeatedly yelling, “Upstairs, upstairs, upstairs,” and can be seen physically directing other intruders to proceed up a staircase. The video also shows a stream of intruders walking up a nearby staircase. Two sample screenshots of that YouTube video appear below.



11. I have confirmed with U.S. Capitol Police that the staircase depicted in the video does, in fact, lead to Speaker Pelosi’s office. I have also reviewed maps of the interior areas of the U.S. Capitol and confirmed the subject appears to have been in an area near “the crypt,” sometimes referred to as the “Small House Rotunda.” In the audio of the ITV News video, the reporter states that the recording took place near the U.S. Capitol Building area called “the crypt.” In the background of the top screenshot above, a bust of Winston Churchill is visible behind the subject, which is also consistent with the location in the “Small House Rotunda.” The maps confirm that there is a nearby staircase, which leads to the office of the Speaker of the United States House of Representatives, Nancy Pelosi.

12. I have reviewed other images the FBI obtained that were taken during the January 6, 2021, civil unrest inside the U.S. Capitol Building. Set forth below is a photograph that also depicts the WILLIAMS inside the U.S. Capitol Building, pointing and directing intruders. She is wearing the same green t-shirt and brown trench coat. I believe that the photograph below was taken in Statuary Hall, inside the U.S. Capitol Building.



13. I have also reviewed other videos obtained by the FBI that were taken outside the U.S. Capitol on January 6, 2021. WILLIAMS can be seen in one or more of these videos entering the U.S. Capitol. She is wearing the same green t-shirt, brown trench coat, and black-and-white shoulder bag. A screenshot of one of the videos is set forth below.



14. I have identified the WILLIAMS in these screenshots based on a variety of methods. As noted above, W1 called the FBI tip line and confirmed that WILLIAMS is depicted in the video described above. I have also reviewed the Pennsylvania driver's license photograph for WILLIAMS, set forth below, and compared it to the photographs and videos described above. I believe they depict the same person.



15. In addition, I have spoken with local law enforcement agents in Harrisburg about their recent interactions with WILLIAMS' parents. According to those officers, on January 11, 2021, local law enforcement received a suspicious persons report filed by WILLIAMS' mother. Officers arrived at the address that WILLIAMS shares with her mother and interviewed her mother. WILLIAMS was not present. According to WILLIAMS' mother, the suspicious person was assumed to be W1. WILLIAMS' mother, with officers present, used her cell phone to place a video-enabled phone call to WILLIAMS. Officers observed WILLIAMS on her mother's cell phone screen and noted that WILLIAMS was wearing a brown-colored jacket, consistent with the screenshots above.

16. According to the Harrisburg officers, on January 16, 2021, they again spoke with WILLIAMS' mother who told them that a British media crew had come to her home the night before, asking to speak with WILLIAMS, who was not present. The news crew presented WILLIAMS' mother with one or more images taken at the U.S. Capitol on January 6, 2021. Her mother acknowledged that it was WILLIAMS in the image.

17. According to the Harrisburg officers, on or about January 16, 2021, officers called WILLIAMS' father who resides in Camp Hill, PA. He stated that he drove to Washington, D.C., with WILLIAMS for the protests on January 6, 2021. He stated that his daughter and he did not stay together throughout the day and that WILLIAMS was meeting up with other individuals she knew at the protests. WILLIAMS later met up with her father outside of the U.S. Capitol Building, and they returned home to Harrisburg together.

18. On or about January 16, 2021, ITV posted a second related video to YouTube, titled "Revealed: ITV News identifies protester who stormed the Capitol," found at <https://www.youtube.com/watch?v=cfzJs4MfTe0>. In this 2 ½ minute video, the reporter identifies "Riley Williams" as the person depicted in snippets of the prior ITV video described above. The reporter then interviewed a woman who identified herself as WILLIAMS' mother and showed her some type of video footage. WILLIAMS' mother then stated that she recognized her daughter inside the U.S. Capitol Building and that her daughter had taken a sudden interest in President Trump's politics and "far right message boards." She claimed that WILLIAMS

“took off,” “is gone,” and is waiting for law enforcement to come to WILLIAMS and ask her about her activities in the Capitol .

19. It appears that WILLIAMS has fled. According to local law enforcement officers in Harrisburg, WILLIAMS’ mother stated that that WILLIAMS packed a bag and left her home and told her mother she would be gone for a couple of weeks. WILLIAMS did not provide her mother any information about her intended destination. Sometime after January 6, 2021, WILLIAMS changed her telephone number and deleted what I believe were her social media accounts on Facebook, Instagram, Twitter, Reddit, Telegram, and Parler.

20. Based on the foregoing, your affiant submits that there is probable cause to believe that RILEY JUNE WILLIAMS 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 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.

21. Your affiant submits that there is also probable cause to believe that RILEY JUNE WILLIAMS violated 40 U.S.C. § 5104(e)(2)(D) and 5104(e)(2)(G) which make 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.



Jonathan Lund
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 17th day of January 2021.

Robin M. Meriweather
U.S. MAGISTRATE JUDGE