

UNITED STATES DISTRICT COURT

for the
District of Columbia

United States of America

v.

Corinne Lee Montoni



Defendant(s)

Case: 1:21-mj-00289

Assigned To : Harvey, G. Michael

Assign. Date : 3/8/2021

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

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1512(c)(2), 18 U.S.C. §§ 1752(a)(1) and (2),	Obstruction of an Official Proceeding Entering and Remaining; Disorderly and Disruptive Conduct in Restricted Building or Grounds
40 U.S.C. §§ 5104(e)(2)(D) and (G)	Disorderly Conduct; Parading, Demonstrating, or Picketing in a Capitol Building
18 U.S.C. § 2(a)	Aiding and abetting the commission of these offenses against the United States

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

Timothy D. Taylor, 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 _____ (specify reliable electronic means).Date: 03/08/2021

Judge's signature

City and state: Washington, DC

U.S. Magistrate Judge G. Michael Harvey

Printed name and title

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

I, Timothy D. Taylor, a Special Agent with the Federal Bureau of Investigation, Tampa, Florida, being duly sworn, depose and state as follows:

PURPOSE OF AFFIDAVIT

1. This Affidavit is submitted in support of a Criminal Complaint and Arrest Warrant charging **Corinne Lee MONTONI** with violations of 18 U.S.C. §1512(c)(2); 18 U.S.C. §§ 1752(a)(1) and (2); 40 U.S.C. §§ 5104(e)(2)(D) and (G); and 18 U.S.C. § 2(a), as identified below.

2. I respectfully submit that this Affidavit establishes probable cause to believe that **MONTONI**: (1) attempted, and did, corruptly obstruct, influence, and impede an official proceeding, that is a proceeding before Congress, by entering and remaining in the United States Capitol without authority and committing an act of civil disorder and engaging in disorderly and disruptive conduct, in violation of 18 U.S.C. § 1512(c)(2) (Obstruction of an Official Proceeding); (2) did unlawfully and knowingly enter or remain in a restricted building or grounds, that is any posted, cordoned-off, or otherwise restricted area within the United States Capitol or its grounds, where the Vice President and Vice President-Elect were temporarily visiting, without lawful authority to do so, or did 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 such restricted building or grounds, in violation of 18 U.S.C. §§ 1752(a)(1) and (2) (Entering and Remaining; Disorderly and Disruptive Conduct in Restricted Building or Grounds); (3) did willfully and knowingly utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, in any of the United States Capitol Buildings with 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, or did willfully and knowingly parade, demonstrate, or picket in any United States Capitol Buildings, in violation of 40 U.S.C. §§ 5104(e)(2)(D) and (G) (Disorderly Conduct; Parading, Demonstrating, or Picketing in a Capitol Building); and (4) did aid and abet the commission of these offenses against the United States, in violation of 18 U.S.C. § 2(a).

AGENT BACKGROUND

3. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and, as such, am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C). I joined the FBI as an Intelligence Analyst in 2008, and then became a Special Agent in August 2010. As a special agent, I have participated in numerous investigations and have executed both arrest and search warrants. In addition to my regular duties, I am currently also tasked with investigating criminal activity that occurred in and around the Capitol grounds on January 6, 2021.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and arrest warrant and does not set forth all of my knowledge about this matter. When a date is listed, I mean that the event occurred “on or about” that date. When a time period is listed, I mean that the event occurred “in or around” that time period.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is a “court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), and (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction

over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i). As discussed more fully below, the U.S. Attorney’s Office for the District of Columbia is investigating this case, which, among other things, involves violations of Title 18 U.S.C. § 1512(c)(2); Title 18 U.S.C. §§ 1752(a)(1) and (2), and Title 40 U.S.C. §§ 5104(e)(2)(D) and (G). The conduct at issue includes an overt act in the District of Columbia, in the form of entering a restricted area around the Capitol on January 6, 2021, as part of a mob that disrupted the proceedings of Congress.

STATEMENT OF FACTS SUPPORTING PROBABLE CAUSE

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

6. U.S. Capitol Police (USCP), the FBI, and assisting law enforcement agencies are investigating a riot and related offenses that occurred at the United States Capitol Building, located at 1 First Street, NW, Washington, D.C., 20510 at latitude 38.88997 and longitude -77.00906 on January 6, 2021.

7. At the U.S. Capitol, the building itself has 540 rooms covering 175,170 square feet of ground, roughly four acres. The building is 751 feet long (roughly 228 meters) from north to south and 350 feet wide (106 meters) at its widest point. The U.S. Capitol Visitor Center is 580,000 square feet and is located underground on the east side of the Capitol. On the west side of the Capitol building is the West Front, which includes the inaugural stage scaffolding, a variety of open concrete spaces, a fountain surrounded by a walkway, two broad staircases, and multiple terraces at each floor. On the East Front are three staircases, porticos on both the House and Senate side, and two large skylights into the Visitor’s Center surrounded by a concrete parkway. All of this area was barricaded and off limits to the public on January 6, 2021.

8. The U.S. Capitol is secured 24 hours a day by USCP. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by USCP. Only authorized people with appropriate identification are allowed access inside the U.S. Capitol.

9. On January 6, 2021, the exterior plaza of the U.S. Capitol was closed to members of the public.

10. On January 6, 2021, a joint session of the United States Congress convened at the U.S. Capitol. 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 U.S. Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which took place on November 3, 2020 (“Certification”). The joint session began at approximately 1:00 p.m. Eastern Standard Time (EST). Shortly thereafter, by approximately 1:30 p.m. EST, 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.

11. 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 USCP were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

12. At around 1:00 p.m. EST, known and unknown individuals broke through the police lines, toppled the outside barricades protecting the U.S. Capitol, and pushed past USCP and supporting law enforcement officers there to protect the U.S. Capitol.

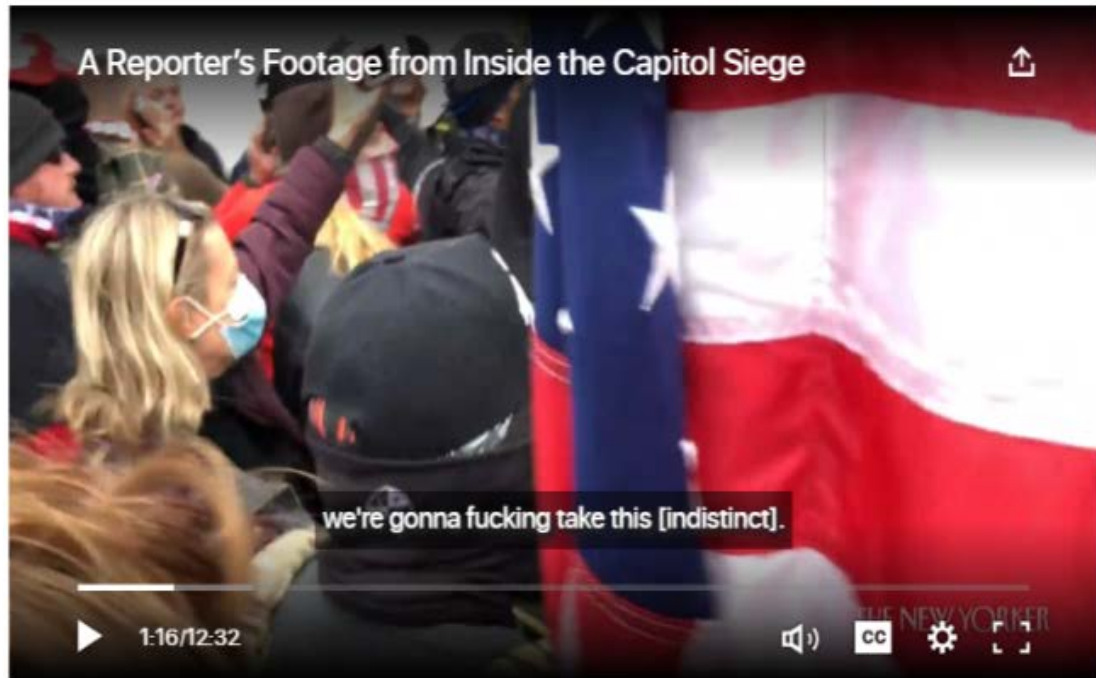
13. At around 1:30 p.m. EST, USCP ordered Congressional staff to evacuate the House Cannon Office Building and the Library of Congress James Madison Memorial Building in part

because of a suspicious package found nearby. Pipe bombs were later found near both the Democratic National Committee and Republican National Committee headquarters.

14. Media reporting showed a group of individuals outside of the Capitol chanting, “Hang Mike Pence.” I know from this investigation that some individuals believed that Vice President Pence possessed the ability to prevent the certification of the presidential election and that his failure to do so made him a traitor.

15. At approximately 2:00 p.m. EST, some people in the crowd forced their way through, up, and over the barricades and law enforcement. 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. 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 law enforcement attempted to maintain order and keep the crowd from entering the Capitol.

16. Shortly after 2:00 p.m. EST, individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of law enforcement, as others in the crowd encouraged and assisted those acts. Publicly available video footage shows an unknown individual saying to a crowd outside the Capitol building, “We’re gonna fucking take this,” which your affiant believes was a reference to “taking” the U.S. Capitol.



17. Shortly thereafter, at approximately 2:20 p.m. EST, 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. That is, at or about this time, USCP ordered all nearby staff, Senators, and reporters into the Senate chamber and locked it down. USCP ordered a similar lockdown in the House chamber. As the subjects attempted to break into the House chamber, by breaking the windows on the chamber door, law enforcement were forced to draw their weapons to protect the victims sheltering inside.

18. At approximately 2:30 p.m. EST, known and unknown subjects broke windows and pushed past USCP and supporting law enforcement officers forcing their way into the U.S. Capitol on both the west side and the east side of the building. Once inside, the subjects broke windows and doors, destroyed property, stole property, and assaulted federal police officers. Many of the federal police officers were injured and several were admitted to the hospital. The subjects also confronted and terrorized members of Congress, Congressional staff, and the media. The subjects carried weapons including tire irons, sledgehammers, bear spray, and tasers. They also took police

equipment from overrun police including shields and police batons. At least one of the subjects carried a handgun with an extended magazine. These actions by the unknown individuals resulted in the disruption and ultimate delay of the vote Certification.

19. Also at approximately 2:30 p.m. EST, USCP ordered the evacuation of lawmakers, Vice President Mike Pence, and president pro tempore of the Senate, Charles Grassley, for their safety.

20. At around 2:45 p.m. EST, subjects broke into the office of House Speaker Nancy Pelosi.

21. At around 2:47 p.m. EST, subjects broke into the United States Senate Chamber. Publicly available video shows an individual asking, “Where are they?” as they opened up the door to the Senate Chamber. Based upon the context, law enforcement believes that the word “they” is in reference to members of Congress.

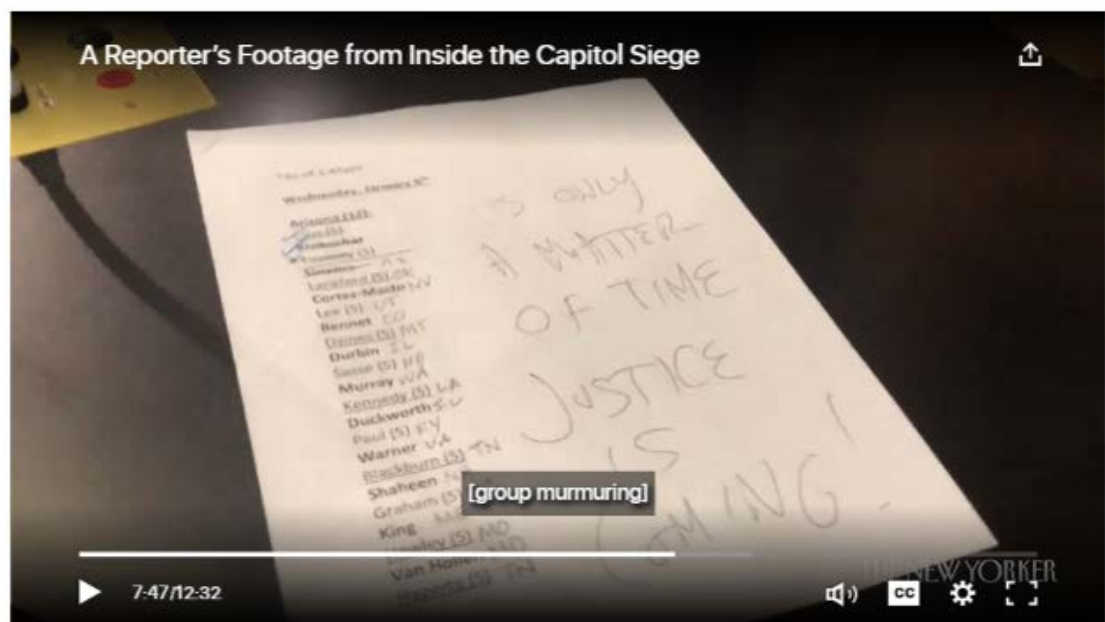


22. After subjects forced entry into the Senate Chamber, publicly available video shows that an individual asked, “Where the fuck is Nancy?” Based upon other comments and the context,

law enforcement believes that the “Nancy” being referenced was the Speaker of the House of Representatives, Nancy Pelosi.



23. One subject left a note on the podium on the floor of the Senate Chamber. This note, captured by the filming reporter, stated “A Matter of Time Justice is Coming.”



24. During the time when the subjects were inside the Capitol building, multiple subjects were observed inside the U.S. Capitol wearing what appears to be, based upon my training and experience, tactical vests and carrying flex cuffs. Based upon my knowledge, training, and experience, I know that flex cuffs are a manner of restraint that are designed to be carried in situations where a large number of individuals are expected to be taken into custody.





25. At around 2:48 p.m. EST, DC Mayor Muriel Bowser announced a citywide curfew beginning at 6:00 p.m. EST.

26. At around 2:45 p.m. EST, one subject was shot and killed while attempting to break into the House chamber through the broken windows.

27. At about 3:25 p.m. EST, law enforcement officers cleared the Senate floor.

28. Between 3:25 and around 6:30 p.m. EST, law enforcement was able to clear the U.S. Capitol of all of the subjects.

29. Based on these events, all proceedings of the United States Congress, including the joint session, were effectively suspended until shortly after 8:00 p.m. EST 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.

30. Beginning around 8:00 p.m. EST, the Senate resumed work on the Certification.

31. Beginning around 9:00 p.m. EST, the House resumed work on the Certification.

32. Both chambers of Congress met and worked on the Certification within the Capitol building until approximately 3:00 a.m. EST on January 7, 2021.

33. 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.

34. Based on my training and experience, I know that it is common for individuals to carry and use their cell phones during large gatherings, such as the gathering that occurred in the area of the U.S. Capitol on January 6, 2021. Such phones are typically carried at such gatherings to allow individuals to capture photographs and video footage of the gatherings, to communicate with other individuals about the gatherings, to coordinate with other participants at the gatherings, and to post on social media and digital forums about the gatherings.

35. Many subjects seen on news footage in the area of the U.S. Capitol are using a cell phone in some capacity. It appears some subjects were recording the events occurring in and around the U.S. Capitol and others appear to be taking photos, to include photos and video of themselves after breaking into the U.S. Capitol itself, including photos of themselves damaging and stealing property. As reported in the news media, others inside and immediately outside the

U.S. Capitol live-streamed their activities, including those described above as well as statements about these activities.

36. Photos below, available on various publicly available news, social media, and other media show some of the subjects within the U.S. Capitol during the riot. In several of these photos, the individuals who broke into the U.S. Capitol can be seen holding and using cell phones, including to take pictures and/or videos:



¹ <https://losangeles.cbslocal.com/2021/01/06/congresswoman-capitol-building-takeover-an-attempted-coup/>



2



3

² <https://www.businessinsider.com/republicans-objecting-to-electoral-votes-in-congress-live-updates-2021-1>.

³ <https://www.thv11.com/article/news/arkansas-man-storms-capitol-pelosi/91-41abde60-a390-4a9e-b5f3-d80b0b96141e>

Evidence Linking MONTONI to the Assault on the U.S. Capitol

37. On January 7, 2021, a complainant (“C-1”) submitted an online tip to the FBI National Threat Operations Center (“NTOC”) via tips.fbi.gov. In the tip, C-1 reported that **MONTONI** was involved in property damage that occurred during the riot at the U.S. Capitol. In an initial interview on January 8, 2021, C-1 reported that he/she had scrolled through Facebook on January 6, 2021, and had seen comments from another person regarding **MONTONI** attending the riots and being inside the U.S. Capitol. C-1 said that the comments suggested that law enforcement would identify **MONTONI** as having been inside the Capitol, and the commentator warned **MONTONI** to be careful. C-1, who did not personally know **MONTONI**, went to **MONTONI**'s Facebook page (username: *corinne.montoni*) and saw videos of a female she believed to be **MONTONI** inside the Capitol, as well as posts from **MONTONI** that discussed taking over the Capitol. On or about January 12, 2021, C-1 emailed the FBI with screen captures of several photos and posts C-1 captured from Facebook account *corinne.montoni* and Instagram account @_montoni. I compared the photos and the account vanity names on the screen captures provided by C-1 to a Florida driver's license photo of **MONTONI**, and confirmed that the individual believed by C-1 to be **MONTONI** was in fact **MONTONI**.

38. In a follow-up interview on January 12, 2021, C-1 reported that videos posted on January 6, 2021, showed **MONTONI** inside the U.S. Capitol, panning the camera to other people who were also inside the building. **MONTONI** was bragging about being inside and taking over the Capitol. C-1 also said that **MONTONI** had posted information about plans to return to Washington, D.C. for the presidential inauguration on January 20, 2021. However, upon returning to view the videos and posts, C-1 noted that **MONTONI**'s account was later deleted. Screen

captures obtained by C-1 and provided to the FBI included the following statements from Facebook and Instagram accounts associated with **MONTONI**:

- “We tried going to the courts. We tried showing evidence. We tried the nice and legal way but when corruption runs so deep for so long, that doesn't work....Today we showed them how done we are. The Capitol building belongs to US, we the people. This is our house....We broke a few windows, sure but we were a peaceful protest occupying the people's property...” (Facebook username: *corinne.montoni*. Dated January 6, 2021).⁴
- “Trump is our leader. This is not over yet. January 6th is the day to keep an eye on and if that doesn't work, we will be back in DC on the 20th letting the world know we REJECT progressive liberalism.” (Instagram username: *@_montoni*. Dated: December 16, 2020).⁵

39. In a separate NTOC tip from January 7, 2021, another complainant (“C-2”) reported that **MONTONI** had informed her family that she had taken a flight from Tampa to Washington D.C., and had stayed in a hotel in Washington. C-2 is a close acquaintance of **MONTONI**, who advised that he/she is aware of **MONTONI**’s activities. **MONTONI** stated to C-2 that she had stormed the U.S. Capitol and had gotten inside the building. C-2 said that there were pictures on Facebook of the rioting featuring **MONTONI** saying it was “awesome” and “intense.”

40. In an interview on January 13, 2021, C-2 confirmed his/her previous reporting and said that **MONTONI** had contacted her relative, W-1, when she got back to her hotel to tell him/her about penetrating the U.S. Capitol. W-1 then called C-2 to report the conversation, which is when C-2 observed the above Facebook content. C-2 attempted to access the Facebook content in the presence of interviewing agents, but he/she had been blocked by **MONTONI**. C-2 then attempted to call **MONTONI**, but **MONTONI** did not answer. C-2 made a positive identification

⁴ I compared this screen capture against records obtained from Facebook pursuant to legal process and confirmed that this statement was posted on January 6, 2021.

⁵ I compared this screen capture against records obtained from Instagram pursuant to legal process and confirmed that this statement was posted; however, the records reflect a posting date of December 15, 2020.

of **MONTONI** from an image obtained from a video taken inside the Capitol on January 6, 2021. This identification is discussed further below.

41. In an interview on January 8, 2021, another complainant (“C-3”) reported that he/she was Facebook friends with **MONTONI** because he/she went to high school with **MONTONI** in Connecticut. C-3 reported that on January 6, 2021, he/she had viewed **MONTONI**'s Facebook timeline, which indicated that **MONTONI** had flown from Florida to Washington, D.C. C-3 further believed that **MONTONI** had used her phone to capture and post images of a hallway within the U.S. Capitol. While C-3 was not sure if **MONTONI** was visible in any of her videos, C-3 recognized **MONTONI**'s voice in the videos. C-3 believed that **MONTONI** was in some of the photos she had posted. In addition, one video that **MONTONI** had posted showed people dispersing within the Capitol after tear gas was released. Furthermore, in one of the videos from within the Capitol, **MONTONI** stated “we have entered the Capitol” and “this belongs to us.”

42. In a follow-up interview, C-3 reported that **MONTONI** had posted on her Facebook page (username: *corinne.montoni*) on the day of the riots—January 6, 2021—saying that she was inside the U.S. Capitol. C-3 stated that he/she saw three separate videos of **MONTONI** inside the Capitol. One video showed **MONTONI** in a crowded hallway at the time that tear gas was dispersed inside the building. C-3 also saw another post, from after the incident, in which **MONTONI** said that she had more videos on her phone that she would post in the near future. However, according to C-3, **MONTONI** did not post those videos to her Facebook page. C-3 also noted that within 10 hours of him/her seeing the videos, **MONTONI**'s Facebook page was taken down.

Additional Social Media Evidence

43. Based, in part, on the above information, I obtained records through an open source review of social media as well as through legal process for the following three social media accounts: Facebook (username: corinne.montoni), Instagram (username: @_montoni), and Parler (username @corimontoni). All three accounts are linked to **MONTONI**. Evidence linking the three accounts to **MONTONI**, includes, but is not limited to the following:

- a. The Facebook account was identified as belonging to **MONTONI** by C-1, C-2, and C-3, and records from Facebook identify her as the user.
- b. The Instagram account was identified as belonging to **MONTONI** by C-1, and records from Instagram identify her as the user.
- c. The Parler account was identified as belonging to **MONTONI** by the user of the said Facebook and Instagram accounts, and records from Parler identify her as the user.

In addition, similar, and on occasion, identical posts, appear on these three social media forums, and images of the user appear on each of the three social media forums. I can confirm that these images are **MONTONI**, based on my comparison of these images with the photograph on **MONTONI's** Florida driver's license. In addition, as detailed below, C-2 positively identified one of the posted images as **MONTONI**.

44. The social media records include several videos, depicting **MONTONI** in and around the Capitol building on or about January 6, 2021. The videos include, but are not limited to the following:

- a. VIDEO 1 (posted on **MONTONI's** Parler account on January 6, 2021):
MONTONI appears outside the Capitol building, wearing a gray "Trump"

sweatshirt and a blue hat with the words “Make America Great Again.” She says, “Okay they breached the Capitol. Pence refused to hear the objections and now we surrounded the Capitol building. This is nuts.”

b. VIDEO 2 (posted on **MONTONI**’s Instagram account on January 6, 2021):

MONTONI appears inside the Capitol with other protestors in the background. She is wearing the same “Trump” sweatshirt as depicted in Video 1. She says, “We’re in the Capitol cuz this is our house – we paid for this, and they’re trying to steal it from us. Let’s go!”

- i. On or about January 27, 2021, I provided a cropped image of the female depicted in this video to C-2, who, as noted above is a close acquaintance of **MONTONI**. C-2 positively identified the female in the video as **MONTONI**.
- ii. The photograph below (on the left) depicts a cropped image of the individual who was positively identified by C-2 as being **MONTONI**. The photograph below (on the right) depicts an uncropped image of the same individual during the same video sequence inside the U.S Capitol on January 6, 2021, and wearing a “Trump” sweatshirt.

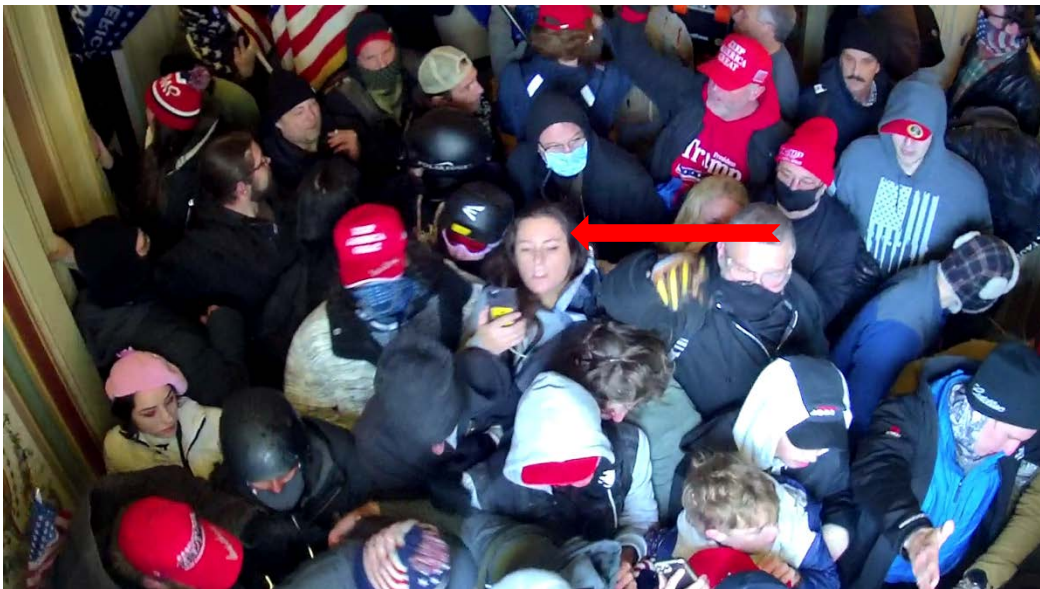


- c. VIDEO 3 (posted on **MONTONI**'s Parler account on January 6, 2021): The video shows a large crowd of protesters jammed inside a hallway of the Capitol building. Most of the crowd is wearing clothing bearing the American flag or colors, or depicting the name or a slogan of President Trump. A group of protestors appear to be pushing against a line of police officers, while other protestors scream, "Push!" **MONTONI**'s voice can be heard shouting, "We paid for this!"⁶ **MONTONI**'s voice can also be heard yelling and then joining the crowd as it chants "U.S.A." repeatedly. Members of the crowd appear to react to something at the end of the hallway, possibly pepper spray. They can be heard yelling to other members of the

⁶ I assess that the voice heard on this video is **MONTONI**'s based on a comparison to the other videos that were obtained from her social media account in which she can be seen while speaking. C-3 also advised that he/she heard **MONTONI**'s voice while viewing a similarly-described video, which was posted on her social media.

crowd to “clear a path.” Several crowd members appear to be moving away from the end of the hallway as they rub their eyes.

45. Photographs obtained from the U.S. Capitol Police further corroborate **MONTONI**’s presence inside the U.S. Capitol on January 6, 2021. Below is an image I assess to be **MONTONI**, wearing a gray sweatshirt and holding a phone, while among a large crowd inside the Capitol building. I believe this photo captures the moments during which **MONTONI** was filming Video 3.



46. Records obtained from **MONTONI**’s social media – that is, from the aforementioned Facebook, Instagram, and Parler accounts – provide further evidence of **MONTONI**’s state of mind and presence at the U.S. Capitol on January 6, 2021, for the purpose of protesting the November 3, 2020 election results and preventing the certification of the election. Below is sampling of the many conversations I came across upon my review of **MONTONI**’s social media:

47. During a December 13, 2020 private Facebook chat regarding her apparent participation in the Million MAGA March, **MONTONI** commented, “We’re booking our shit for inauguration dude January 20th [sic]...We are not letting Biden steal this shit”.

48. On December 15, 2020, **MONTONI** posted on Instagram, “Trump is our leader. This is not over yet. January 6th is the day to keep an eye on and if that doesn’t work, we will be in DC on the 20th letting the world know we REJECT progressive liberalism.”

49. In a December 16, 2020 private Facebook chat with an individual, the individual stated, “Getting close,” to which **MONTONI** replied, “To what...The revolution?”

50. On December 16, 2020, **MONTONI** posted on Parler, “Insurrection Act coming in hot.. void the fraudulent 2020 election, arrest these traitors and restore order and faith in our justice department. GitMo is readyyyyyy [sic]”. On December 17, **MONTONI** posted, “Even if Trump loses (which I don’t believe he will), he has cemented himself as our leader. He will have even more influence being free from the rules of the presidency. This has just begun. Hold the line.”

51. Also, on December 18, 2020, **MONTONI** and an individual shared and discussed multiple news articles on Facebook. Regarding an article that stated that the Department of Defense ordered a halt to cooperation with the presidential transition team, **MONTONI** stated, “Yess that happened this morning. But the explanation was that Theyre overwhelmed with work but they’ve never been before in other elections [sic]”. The individual responded, “Biden n harris must not be sworn in [sic],” to which **MONTONI** replied, “Nope fuck them”. **MONTONI** then shared an article discussing “President Trump on Saturday promised that there would be a “wild” protest in Washington D.C. on Jan. 6...” The individual asserted, “Some big shit is going down.... This next week is going to be insane.” **MONTONI** agreed, “Yup...I know.”

52. On December 20, 2020, **MONTONI** discussed with an individual on Facebook plans to travel to Washington, DC for the January 6, 2021 rally. **MONTONI** asserted, “Trump called us to dc jan 6th [sic]”. When the individual lamented that he might not be able to afford the trip, **MONTONI** stated, “Haha well I want you there so I’ll help...For Christmas...It’s a Christmas present...Money is arbitrary when we’re talking revolution”.

53. On December 25, 2020, **MONTONI** discussed with an individual on Facebook plans to travel to Washington, DC for the January 6, 2021 rally. The individual stated, “Well still have a good time [sic]... And do our patriotic duty”. **MONTONI** agreed, “Yup!... It better be a Trump victory party,” to which the individual stated, “Or were going to fucking WAARRRRR party... Wooh!”. **MONTONI** agreed, “Yuppppppp”.

54. On December 28, 2020, **MONTONI** posted to her Parler account, “If Pence betrays us, we riot.” On December 29, 2020, she posted, “January 6th in DC is going to be YUGEEEE! It’s either going to be a Trump victory party or the first real day of the revolution. Who’s going?!”

55. On January 5, 2021, **MONTONI** posted to her Parler account, “DC bound see ya there Revolutionists!” At times throughout the day of January 6, 2021, **MONTONI** posted: “WE BREACHED THE CAPITOL OMG”; “Insurrection is coming. Hold the line. Stay vigilant.”; “Storming the Capitol to take back our country from traitors! This is OUR HOUSEEEEE!”; and “Here’s a pretty little view from inside the Capitol at our traitor DC police, with a smashed window. Congratulations to them, they got both sides to hate them.”

56. On January 6, 2021, **MONTONI** posted to her Facebook account “Some small videos from today. I have so much more. I have to go through them all. FUCK TRAITORS.” During a January 7, 2021, private chat regarding her participation in the riot, **MONTONI** told a Facebook contact, “Hahah yeah it was so fun. But they did pepper spray us.”

57. On January 6, 2021, **MONTONI** commented to another Parler user, “I was there. We were 99% MAGA. I didn’t see one ANTIFA. And I was inside the Capitol.”

58. On January 6, 2021, **MONTONI** posted to her Facebook account, in part: “We are DONE with these traitors. Today, we showed them how done we are. The Capitol building belongs to US, we the people. This is our house... We broke a few windows, sure but we were a peaceful protest occupying the people’s property. Maybe we should have burned down and looted a Walmart in the name of “justice” and the media would have called it a “peaceful protest”. Fuck traitors. Fuck the biased media. We are DONE letting corruption run wild.” Additionally, in a January 6, 2021 private chat, in which **MONTONI** was asked “Did you break in or just go instead the halls to protest peacefully,” **MONTONI** replied “Obv broke in because it was locked. They had to breach the gates first [sic]... We didn’t do anything destructive except break the window.”

59. On January 6, 2021, **MONTONI** posted on Parler, “Insurrection is coming. Hold the line. Stay vigilant.” On January 7, she stated, “If you have a problem with American citizens occupying a building WE OWN, but not a problem with the massive voter fraud and stolen election, you are the enemy.”

60. On January 6, 2021, commenting on her actions inside the Capitol, **MONTONI** stated on Parler, “We do not want civilians. We do not even want most of the cops. We want the TRAITOR POLITICIANS. This is not a civil war. This is a revolution.” On January 7, **MONTONI** again asserted her belief that U.S. politicians were traitors that she had intended to forcibly remove from the Capitol, when stating, “How so? Traitors still occupy our federal buildings. We didn’t win yet.”

61. In a January 7, 2021 private Facebook chat, **MONTONI** asserted her intention to abduct or erroneously arrest members of congress when she shared, “Yep [Vice President Mike

Pence is] first... I was screaming that at the Capitol... We want pence first [sic]”. She furthered this discussion of her intentions in a January 8, 2021 chat, when she stated, “Yeah it’s crazy. They don’t care about BLM or ANTIFA but we want to occupy our own building and take the traitors into custody and it’s a problem”.

62. On January 7, 2021, in a private Facebook chat, **MONTONI** reported, “Now people are like. You’re going to jail...Ok so they’re gonna arrest the 1000 people that went in...Ok [sic]”. The friend stated, “Girlll I was going to tell you to delete it but I didn’t even have a chance because I was dealing with this damn baby... I’m watching a ton of videos from patriots being in lockdown right now [sic]”. **MONTONI** replied, “Yeah I’m glad I did... Haha yup we wanted ANTIFA”. During the same chat session, a friend of **MONTONI** stated, “Oh my gosh!!! I would’ve loved that! But I’m so glad y’all got out of there and you deleted that video!”

63. On January 10, 2021, **MONTONI** stated in a private Facebook chat, “I deleted Facebook so I don’t think I can watch videos on there anymore”.⁷

64. On January 22, 2021, **MONTONI** stated in a private Facebook chat that she planned to delete her Facebook Messenger and move to just text messaging.

CONCLUSION

65. Based on the foregoing, your Affiant submits that there is probable cause to believe that **Corinne Lee MONTONI** violated 18 U.S.C. § 1512(c)(2) (Obstruction of an Official Proceeding); 18 U.S.C. §§ 1752(a)(1) and (2) (Entering and Remaining; Disorderly and Disruptive Conduct in Restricted Building or Grounds); 40 U.S.C. §§ 5104(e)(2)(D) and (G) (Disorderly

⁷ FBI received records from Facebook indicating that **MONTONI**’s Facebook account was deactivated and reactivated on at least January 9, 2021, and January 13, 2021. It does not appear that **MONTONI** ever actually deleted the account during the timeframe in which she discussed deletion.

Conduct; Parading, Demonstrating, or Picketing in a Capitol Building); and 18 U.S.C. § 2(a) (Aiding and Abetting), as identified and described above.

As such, I respectfully request that the court issue a criminal complaint and arrest warrant for **MONTONI**. The statements above are true and accurate to the best of my knowledge and belief.

Respectfully submitted,



TIMOTHY D. TAYLOR
Special Agent, Federal Bureau of Investigation

Sworn to via telephone after submission by reliable electronic means, Fed. R. Crim. P. 3, 4(d), and 4.1, on this 8th day of March 2021.

G. MICHAEL HARVEY
UNITED STATES MAGISTRATE JUDGE