

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Case No:
	:	
v.	:	
	:	
KELLY MEGGS,	:	VIOLATIONS:
	:	
CONNIE MEGGS,	:	18 U.S.C. § 371
	:	(Conspiracy)
	:	
GRAYDON YOUNG, and	:	18 U.S.C. §§ 1361, 2
	:	(Destruction of Government Property and
LAURA STEELE,	:	Aiding and Abetting)
	:	
Defendants.	:	18 U.S.C. §§ 1512(c)(2), 2
	:	(Obstruction of an Official Proceeding and
	:	Aiding and Abetting)
	:	
	:	18 U.S.C. §§ 1752(a)(1), (2)
	:	(Restricted Building or Grounds)
	:	
	:	18 U.S.C. § 1519
	:	(Obstruction of Justice / Destruction of
	:	Records)

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Whitney Drew, being first duly sworn, hereby depose and state as follows:

PURPOSE OF AFFIDAVIT

1. This Affidavit is submitted in support of a Criminal Complaint charging Kelly Meggs, Connie Meggs, Graydon Young,¹ and Laura Steele with violations of 18 U.S.C. §§ 2, 371, 1361, 1512(c)(2), and 1752(a)(1), (2), and Graydon Young with a violation of 18 U.S.C. § 1519

¹ On January 18, 2021, in case 21-MJ-114, the U.S. District Court for the District of Columbia issued a warrant for Young's arrest based on a criminal complaint affidavit charging him with violations of the following statutes: 18 U.S.C. § 1512(c)(2) (Obstruction of Official Proceeding); 18 U.S.C. § 1519 (Obstruction of Justice/Destruction of Records); 18 U.S.C. § 1752(a) (Restricted Building or Grounds); and 40 U.S.C. § 5104(e)(2) (Violent Entry and Disorderly Conduct on Capitol Grounds). The present complaint and arrest warrant affidavit amends the prior version, and the government withdraws the charge of 40 U.S.C. § 5104(e)(2).

(hereinafter, “Subject Offenses”). This Affidavit sets forth evidence establishing probable cause that Kelly Meggs, Connie Meggs, Graydon Young, and Laura Steele conspired together and with others known and unknown to obstruct the United States Congress’s affirmation of the Electoral College vote regarding the results of the 2020 U.S. Presidential Election, and that they committed other related federal crimes in furtherance of that purpose, as set forth below.

2. I respectfully submit that this Affidavit establishes probable cause to believe that Kelly Meggs, Connie Meggs, Graydon Young, and Laura Steele:

- a. Knowingly and willfully conspired together and with others whose identities are known and unknown to law enforcement at this time to commit an offense against the United States, in violation of 18 U.S.C. § 371, that is, to corruptly obstruct, influence, or impede an official proceeding in violation of 18 U.S.C. § 1512(c)(2);
- b. Attempted to willfully injure or commit depredation against any property of the United States, and aided and abetted the willful injury of or depredation against any property of the United States, in violation of 18 U.S.C. §§ 1361 and 2;
- c. Corruptly obstructed, influenced, and impeded an official proceeding, in violation of 18 U.S.C. §§ 1512(c)(2); and
- d. Entered and remained in any restricted building and grounds without lawful authority, and knowingly, and with intent to impede or disrupt the orderly conduct of Government business and official functions, engaged in disorderly and disruptive conduct, in violation of 18 U.S.C. §§ 1752(a)(1), (2); and that
- e. Graydon Young knowingly altered, destroyed, concealed, or covered up a record, document, or tangible object with the intent to impede, obstruct, or

influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States, or in relation to or contemplation of any such matter or case, that is, by deleting his Facebook account on or about January 7, 2021 (after participating in the civil unrest at the U.S. Capitol on January 6, 2021).

3. Specifically, Kelly Meggs, Connie Meggs, and Graydon Young, dressed in uniforms consisting of camouflaged-combat attire, and Laura Steele, dressed in a uniform consisting of military-style attire, operating as a group with several other similarly-attired members of the Oath Keepers militia organization, breached the U.S. Capitol, directly or indirectly damaged property of the Capitol, and obstructed Congressional proceedings.

BACKGROUND OF AFFIANT

4. As a Special Agent with the Federal Bureau of Investigation (“FBI”), I am empowered by law to conduct investigations, make arrests, and execute and serve search and arrest warrants for offenses enumerated in Title 21 and Title 18 of the United States Code. I have received training and gained experience in a variety of criminal laws and procedures, including those involving drug distribution, white collar crime and crimes of violence. Through my training, education and experience, I have become familiar with the manner in which criminal activity is carried out, and the efforts of persons involved in such activity to avoid detection by law enforcement. In addition to my regular duties, I am currently tasked with investigating criminal activity that occurred in and around the U.S. Capitol grounds on January 6, 2021.

5. Unless otherwise stated, the information in this Affidavit is either personally known to me, has been provided to me by other individuals, or is based on a review of various documents, records, and reports. Because this Affidavit is submitted for the limited purpose of establishing

probable cause, it does not contain every fact known by me or the United States. The dates listed in this Affidavit should be read as “on or about” dates.

BACKGROUND

The 2020 United States Presidential Election and the Official Proceeding on January 6, 2021

6. The 2020 United States Presidential Election occurred on November 3, 2020.

7. The United States Electoral College is a group required by the Constitution to form every four years for the sole purpose of electing the president and vice president, with each state appointing its own electors in a number equal to the size of that state’s Congressional delegation.

8. On December 14, 2020, the presidential electors of the U.S. Electoral College met in the state capital of each state and in the District of Columbia and formalized the result of the 2020 U.S. Presidential Election: Joseph R. Biden Jr. and Kamala D. Harris were declared to have won sufficient votes to be elected the next president and vice president of the United States.

9. On January 6, 2021, a Joint Session of the United States House of Representatives and the United States Senate (“the Joint Session”) convened in the United States Capitol building (“the Capitol”) to certify the vote of the Electoral College of the 2020 U.S. Presidential Election (“the Electoral College vote”).

The Attack at the U.S. Capitol on January 6, 2021

10. The Capitol is secured 24 hours a day by United States Capitol Police. The Capitol Police maintain permanent and temporary barriers to restrict access to the Capitol exterior, and only authorized individuals with appropriate identification are allowed inside the Capitol building.

11. On January 6, 2021, at approximately 1:00 p.m., the Joint Session convened in the Capitol building to certify the Electoral College vote. Vice President Michael R. Pence, in his constitutional duty as President of the Senate, presided over the Joint Session.

12. A large crowd began to gather outside the Capitol perimeter as the Joint Session got underway. Crowd members eventually forced their way through, up, and over Capitol Police barricades and advanced to the building's exterior façade. Capitol Police officers attempted to maintain order and stop the crowd from entering the Capitol building, to which the doors and windows were locked or otherwise secured. Nonetheless, shortly after 2:00 p.m., crowd members forced entry into the Capitol building by breaking windows, ramming open doors, and assaulting Capitol Police officers. Other crowd members encouraged and otherwise assisted the forced entry. The crowd was not lawfully authorized to enter or remain inside the Capitol, and no crowd member submitted to security screenings or weapons checks by Capitol Police or other security officials.

13. Shortly thereafter, at approximately 2:20 p.m., members of the House and Senate (including Vice President Pence)—who had withdrawn to separate chambers to resolve an objection—were evacuated from their respective chambers. The Joint Session and the entire official proceeding of the Congress was halted while Capitol Police and other law-enforcement officers worked to restore order and clear the Capitol of the unlawful occupants.

14. Later that night, law enforcement regained control of the Capitol. At approximately 8:00 p.m., the Joint Session reconvened, presided over by Vice President Pence, who had remained hidden within the Capitol building throughout these events.

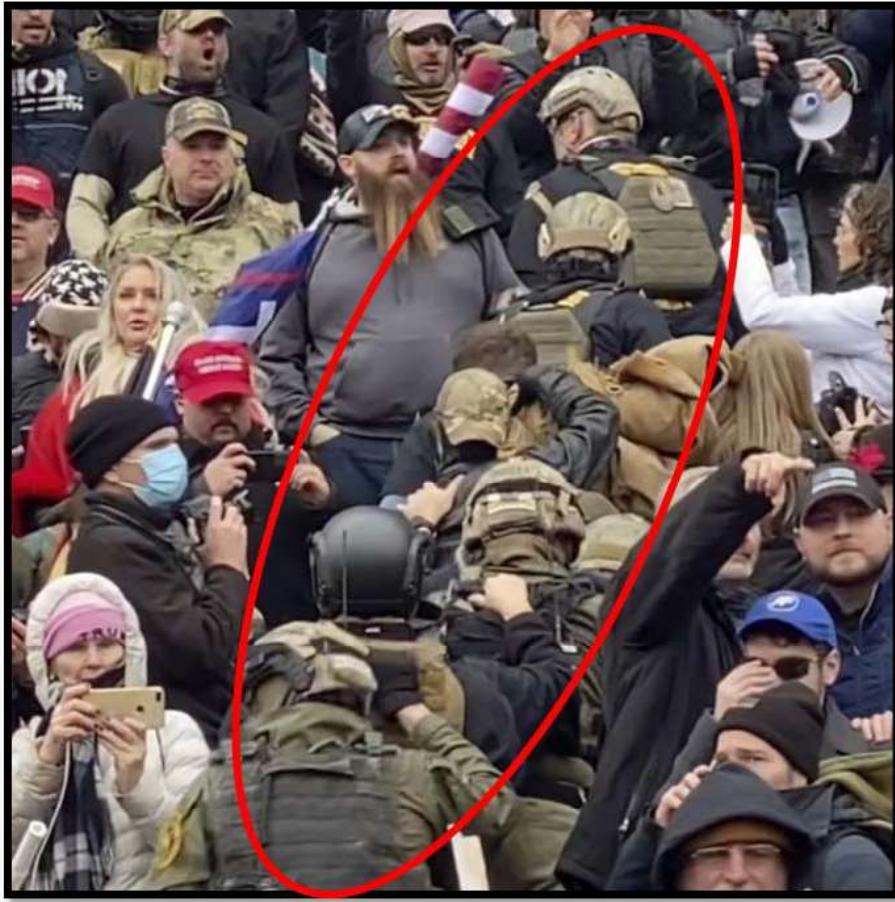
15. In the course of these events, approximately 81 members of the Capitol Police and 58 members of the Metropolitan Police Department were assaulted. Additionally, many media members were assaulted and had cameras and other news-gathering equipment destroyed, and the Capitol suffered millions of dollars in damage—including broken windows and doors, graffiti, and residue of various pepper sprays, tear gas, and fire extinguishers deployed both by crowd members who stormed the Capitol and by Capitol Police officers trying to restore order.

The Oath Keepers Militia

16. Law enforcement and news-media organizations observed that members of a paramilitary organization known as the Oath Keepers were among the individuals and groups who forcibly entered the U.S. Capitol on January 6, 2021. The Oath Keepers are a large but loosely-organized collection of militia that believe that the federal government has been coopted by a shadowy conspiracy that is trying to strip American citizens of their rights. Though the Oath Keepers will accept anyone as members, what differentiates them from other anti-government groups is their explicit focus on recruiting current and former military, law enforcement, and first-responder personnel. The organization's name alludes to the oath sworn by members of the military and police to defend the Constitution "from all enemies, foreign and domestic." The Oath Keepers are led by Person One.

17. In a widely disseminated video² recorded by a photojournalist on January 6, 2021, a "stack" of individuals dressed in matching uniforms consisting of camouflaged-combat attire, to include confirmed Oath Keeper members (further described below), moves up and through a crowd on the east side of the U.S. Capitol. A screenshot of the video is below, with a portion of the "stack" encircled by a red oval:

² See <https://apnews.com/article/ex-military-cops-us-capitol-riot-a1cb17201dfddc98291eadead5badc257/gallery/0ecd1781c66d437f92c61b3f4848a74e> (at slide 10).



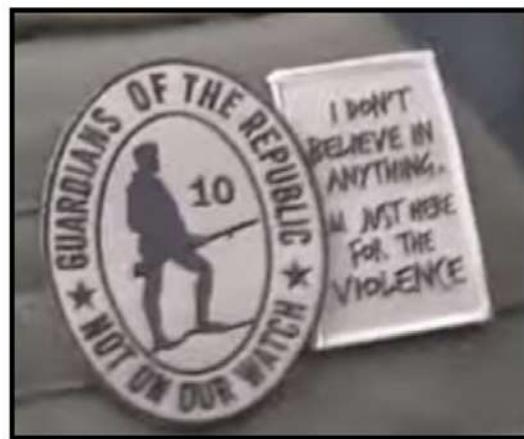
18. Based on my training and experience, a stack or line formation is a tactical formation used by infantryman in the military. One defining feature of this formation is that members keep their hands on the backs or vests of the person in front of them to remain together while entering a room or weaving through a crowd. The purpose of maintaining direct physical contact with one another is to efficiently communicate with one another, especially in crowded or noisy areas.

19. A service called “News2Share” uploaded to YouTube a video of the January 6, 2021, attack at the Capitol. At the approximate 3-minute-and-8-second mark, the video shows eight-to-ten individuals in matching uniforms consisting of camouflaged-combat attire

aggressively approaching an entrance to the Capitol.³ These individuals, who are wearing helmets, reinforced vests, and clothing with Oath Keeper logos and insignia, can be seen moving in an organized and practiced fashion and forcing their way to the front of the crowd gathered around a set of doors to the Capitol.



20. A close-up view of the badges on the vest of one of these individuals, seen just under the Oath Keepers emblem on his shirt, displays the Oath Keepers motto, “Not On Our Watch.”

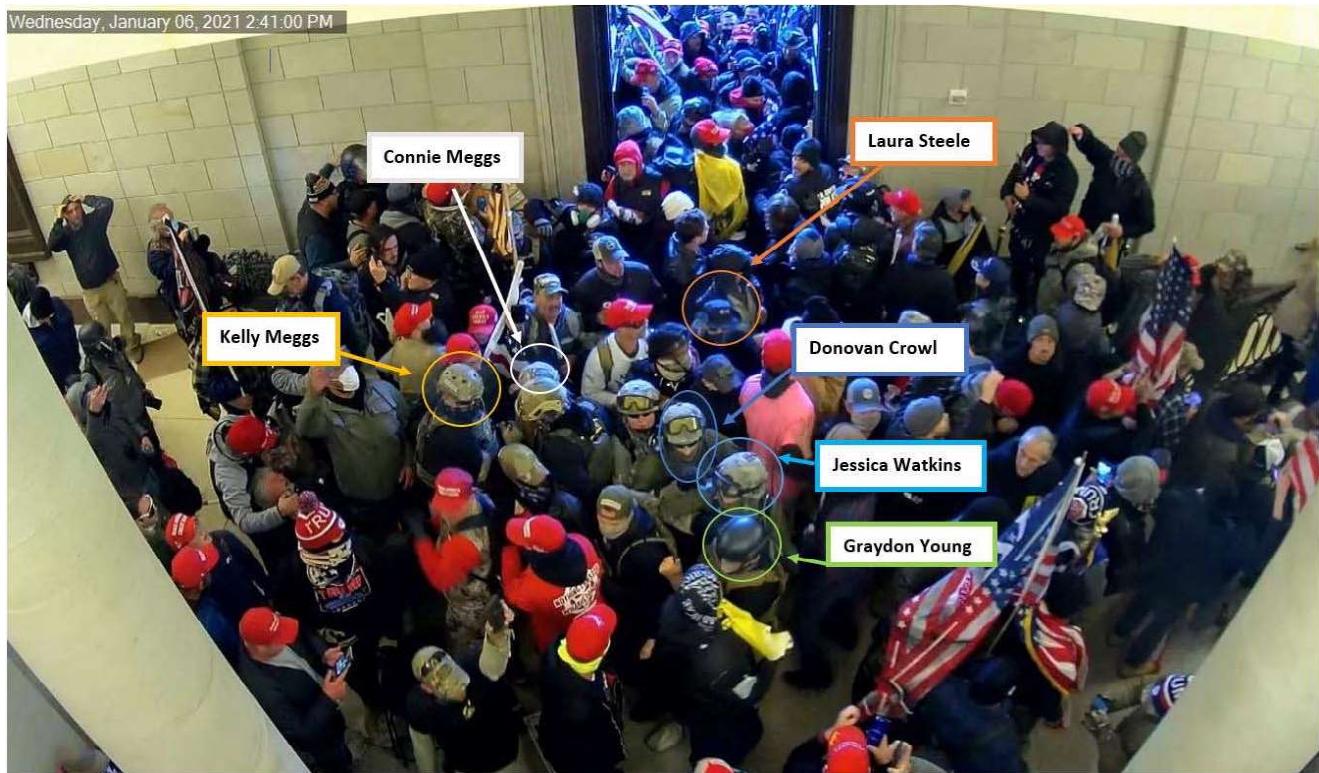


³ See <https://www.youtube.com/watch?v=b76KfHB0QO8&feature=youtu.be>.

21. Based on the foregoing observations of the video, and information gained in the course of my investigation, it is reasonable to believe that the organized group of individuals marching to the doors of the Capitol in the video above are members and affiliates of the Oath Keepers.

22. On January 6, 2021, the particular Capitol doors through which this “stack” of Oath Keepers (and other members of the crowd) breached were significantly damaged. Among other damage, multiple panes of glass were smashed, and a door handle was missing or broken off.

23. Surveillance video from inside the Capitol shows this “stack” of Oath Keepers (and other members of the crowd) shortly after they breached and damaged the doors to the Capitol:



24. Members of the “stack” of Oath Keepers that forcibly entered the Capitol then congregated inside the north section of the Rotunda, as seen in surveillance video from inside the Capitol:



25. Finally, a photojournalist took photos of the members of the “stack” inside the Rotunda as they continued to communicate with one another by keeping their hands on each other’s backs:



Conspirators

Jessica Watkins & Donovan Crowl

26. Jessica Watkins and Donovan Crowl were among the “stack” members who penetrated the U.S. Capitol Rotunda. In a Parler video compiled by ProPublica,⁴ Watkins and Crowl are shown together in the Capitol Rotunda. Crowl says, “We took on the Capitol! We overran the Capitol!” Watkins exclaims, “We’re in the fucking Capitol, [unintelligible]!” Watkins and Crowl turn the camera around for a video selfie as they do so:



27. On January 16, 2021, the government obtained a warrant for Watkins’s and Crowl’s arrests from the District Court for the District of Columbia, and a warrant to search Watkins’s home in Woodstock, Ohio, from the District Court for the Southern District of Ohio.

28. On January 17, 2021, FBI agents executed a search warrant of Watkins’s residence. Inside, they located protective equipment and battle gear of the sort worn during the offenses of January 6, 2021 (to include a camouflage hat and jackets; a backpack with medical/PPE supplies;

⁴ See <https://projects.propublica.org/parler-capitol-videos>.

a black tactical kit with medical supplies, radio, mini drone, and pepper spray; a bag containing a helmet and respirators; and a bag containing a helmet, radio, and belt); cellular telephones; numerous firearms; a paintball gun with rubber-steel balls and a cylinder; pool cues cut down to baton size; zip/cable ties; a recipe for making a destructive device; and other items.

29. That same day, a search of a location where Crowl was said to have occasionally stayed resulted in the recovery of a green reinforced vest. Affixed to the vest was a label with the name “Trapper,” which was a label visible on videos and in photos that captured Crowl during the incursion of the Capitol.

30. Later that day, both Watkins and Crowl were arrested.

31. On January 27, 2021, a federal grand jury in Washington, D.C., indicted Watkins and Crowl, in case number 21-CR-00028, on counts of Conspiracy, in violation of 18 U.S.C. § 371; Obstruction of an Official Proceeding, in violation of 18 U.S.C. § 1512(c)(2); Destruction of Government Property and Aiding and Abetting, in violation of 18 U.S.C. §§ 1361, 2; and Restricted Building or Grounds Access, in violation of 18 U.S.C. §§ 1752(a)(1)-(2).

32. In addition, the FBI has obtained an audio recording of Zello⁵ communications between Watkins and other suspected Oath Keepers during the January 6th attack on the U.S. Capitol. During the recorded transmission—believed to be among Watkins and other Oath Keepers on a Zello channel called “Stop the Steal J6”—Watkins had the following exchanges (among others), which are approximately transcribed:

- a. At the approximate 5-minute mark, the voice believed to be Watkins reports, “We have a good group. We have about 30-40 of us. We are sticking together

⁵ Zello is a push-to-talk application that operates like a walkie-talkie on a cellular telephone. The Zello application may, depending on a user’s settings, store recordings and other information about the user’s communications on the user’s phone.

and sticking to the plan.” An unknown male responds, “We’ll see you soon, Jess. Airborne.”

- b. At the approximate 7-minute-and-44-second mark, an unknown male states, “You are executing citizen’s arrest. Arrest this assembly, we have probable cause for acts of treason, election fraud.” The voice believed to be Watkins responds, “We are in the mezzanine. We are in the main dome right now. We are rocking it. They are throwing grenades, they are fricking shooting people with paint balls. But we are in here.” An unknown male responds to Watkins, telling her to be safe, and states, “Get it, Jess. Do your fucking thing. This is what we fucking [unintelligible] up for. Everything we fucking trained for.”

Thomas Caldwell

33. Thomas Caldwell conspired with members of the Oath Keepers, including Watkins and Crowl, to go to and storm the U.S. Capitol on January 6, 2021. Notably, Caldwell provided logistical assistance, including finding the hotel in Northern Virginia where several members of the conspiracy stayed from January 5 through 7, 2021. Caldwell further coordinated with a group of co-conspirators who agreed to serve as a “quick reaction force” (“QRF”) to monitor the attack at the Capitol from a distance and be prepared to travel to the Capitol in the event they were called upon, possibly while armed. Caldwell also provided maps informing the QRF team how to most effectively reach the Capitol from their staging area.

34. Caldwell was also present outside of the U.S. Capitol on January 6, 2021. In a YouTube video⁶ recording the events of January 6, 2021, Caldwell is interviewed and, while

⁶ See https://www.youtube.com/watch?v=L5hksM_R59M.

motioning to the Capitol, shouts, “Every single [expletive beeped in original] in there is a traitor. Every single one!”



35. On January 19, 2021, law-enforcement officers searched Caldwell’s home during the execution of a search warrant and recovered a Gadsden “Don’t Tread on Me” flag containing Watkins’s and Crowl’s signatures (among others), a Donald Trump poster with Watkins’s and Crowl’s signatures (among others), and a hand-drawn Oath Keepers insignia above the handwritten words “14 Nov 20 ‘Million MAGA March.’”

36. A federal grand jury in Washington, D.C., indicted Caldwell along with Watkins and Crowl on counts of Conspiracy, Obstruction of an Official Proceeding, Destruction of Government Property, and Entering a Restricted Building or Grounds, in case number 21-CR-00028.

37. The FBI has obtained Facebook records and cellular telephone data that demonstrate how Caldwell, Crowl, Watkins, and others planned and coordinated their efforts to stop, delay, and hinder the certification of the results of the 2020 U.S. Presidential Election:

- a. In the days after the election, Watkins texted with a number of people whom she identified in the contacts list of her phone as a possible “recruit.” Watkins

told one of these individuals, “[I]f Biden get the steal, none of us have a chance in my mind. We already have our neck in the noose. They just haven’t kicked the chair yet.”

- b. Caldwell, Crowl, Watkins, and others attended the “Million MAGA” march, held on November 14, 2021, with the Oath Keepers leader, Person One.
- c. After that weekend, Caldwell sent Watkins the following message:

Hi, CAP! Wanted to tell you it was great to have you here in Virginia. Don’t know what [Person One] is cooking up but I am hearing rumblings of another Maga March 12 December. I don’t know what will happen but like you I am very worried about the future of our country. Once lawyers get involved all of us normal people get screwed. I believe we will have to get violent to stop this, especially the antifa maggots who are sure to come out en masse even if we get the Prez for 4 more years. Stay sharp and we will meet again. You are my kinda person and we may have to fight next time. I have my own gear, I like to be ON TIME and go where the enemy is, especially after dark. Keep the faith! Spy.

- d. On December 29, 2020, Watkins texted Crowl to let him know, “We plan on going to DC on the 6th, weather permitting,” and when Crowl asked what was happening that day, Watkins responded, “DC. Trump wants all able bodied Patriots to come. I’m sure Tom would love to see us as well. If Trump activates the Insurrection Act, I’d hate to miss it[.]”
- e. On December 30, 2020, Watkins and Caldwell exchanged several text messages coordinating their plans and the plans of others for January 6, 2021, including the following message sent by Caldwell to Watkins:

Talked to [Person Three].⁷ At least one full bus 40+ people coming from N.C. Another group (unclear if Mississippi guys)

⁷ This individual is referred to in other filings in this matter as “Person Three,” so I am using that nomenclature in this affidavit even though this affidavit does not reference a “Person Two.”

also a bus. Busses have their own lane on the 14th street bridge so they will be able to get in and out. [Person Three] is driving plus 1 and arriving nite before. As we speak he is trying to book a room at Comfort Inn Ballston/Arlington⁸ because of its close-in location and easy access to downtown because he feels 1) he's too broken down to be on the ground all day and 2) he is committed to being the quick reaction force anf bringing the tools if something goes to hell. That way the boys don't have to try to schlep weps on the bus. He'll bring them in his truck day before. Just got a text from him he WAS able to book a room in that hotel I recommended which is on Glebe Road in Arlington. However it goes it will be great to see you again! I sure hope your arm is getting better!

- f. On December 31, 2020, Caldwell replied to a Facebook comment, writing, “It begins for real Jan 5 and 6 on Washington D.C. when we mobilize in the streets. Let them try to certify some crud on capitol hill with a million or more patriots in the streets. This kettle is set to boil...”
- g. On January 6, 2021, while at the Capitol, Caldwell received the following Facebook message: “All members are in the tunnels under capital seal them in. Turn on gas.” When Caldwell posted a Facebook message that read, “Inside,” he received the following messages, among others: “Tom take that bitch over”; “Tom all legislators are down in the Tunnels 3floors down”; “Do like we had to do when I was in the core start tearing oit florrs go from top to bottom”; and “Go through back house chamber doors facing N left down hallway down steps.”
- h. On January 7, 2021, the day after the attack, Caldwell wrote to Crowl, “Did you like the pictures of us storming the castle? I tried calling Cap a lot but it was probably hard for het to hear the phone ring.” Crowl responded, “Loved it.”

⁸ This is the same hotel at which Caldwell, Watkins, and Crowl stayed, at Caldwell’s suggestion.

i. On January 8, 2021, Crowl sent Caldwell a message asking for a video. Caldwell sent it, and Crowl wrote, “Thank you Sir. Love the hell outta you Tom.” Caldwell responded, “You too, my dear friend! We stormed the gates of corruption together (although on opposite sides of the building) so between that and our first meeting and getting to know you since I can say we will always be brothers!”

The Co-Conspirators

Graydon Young, Laura Steele, Kelly Meggs, and Connie Meggs

38. Graydon Young is a 54-year-old resident of Englewood, Florida. As described more fully herein, Graydon Young planned with his sister Laura Steele, and Kelly Meggs and Connie Meggs, and others known and unknown, to forcibly enter the Capitol on January 6, 2021, and to obstruct the Congressional proceeding occurring that day.

39. Laura Steele is a 52-year-old resident of Thomasville, North Carolina. As described more fully herein, Laura Steele planned with her brother Graydon Young, and Kelly Meggs and Connie Meggs, and others known and unknown, to forcibly enter the Capitol on January 6, 2021, and to obstruct the Congressional proceeding occurring that day.

40. Kelly Meggs is a 52-year-old resident of Dunnellon, Florida. As described more fully herein, Kelly Meggs planned with his wife Connie Meggs, and Graydon Young and Laura Steele, and others known and unknown, to forcibly enter the Capitol on January 6, 2021, and to obstruct the Congressional proceeding occurring that day.

41. Connie Meggs is a 59-year-old resident of Dunnellon, Florida. As described more fully herein, Connie Meggs planned with her husband Kelly Meggs, and Graydon Young and

Laura Steele, and others known and unknown, to forcibly enter the Capitol on January 6, 2021, and to obstruct the Congressional proceeding occurring that day.

STATEMENT OF FACTS SUPPORTING PROBABLE CAUSE

42. As described below, evidence uncovered in the course of the investigation demonstrates that not only did Graydon Young, Laura Steele, Kelly Meggs, and Connie Meggs and others conspire to forcibly storm the U.S. Capitol on January 6, 2021—they planned their attack in advance.

Probable Cause – Graydon Young and Laura Steele

43. An individual who will be referred to as W-2 provided the following information to law enforcement.

- a) W-2 stated that while watching news coverage of the civil unrest at the U.S. Capitol W-2 recognized Graydon Young. W-2 has known Young since college (approximately 35 years ago), and W-2 is “Facebook friends” with Young.
- b) W-2 provided a link to an NBC News article with 43 separate photos of the civil unrest at the U.S. Capitol.¹ W-2 stated that Young was visible in photo #2, which is reproduced below (with a red arrow added to identify the particular person):



- c) The above photograph shows Young inside the Rotunda of the U.S. Capitol on January 6, 2021.
- d) W-2 stated that Young lives in Florida.
- e) W-2 stated that on Monday January 4, 2021, Young was tagged in other people's Facebook posts, saying they were headed up to Washington, D.C.
- f) W-2 stated that on January 7, 2021 – the day after the civil unrest at the U.S. Capitol – Young deleted his Facebook posts back through March 2019, and subsequently deleted his entire Facebook account.

44. An individual who will be referred to as W-1 provided the following information to law enforcement.

- a) On January 6, 2021, in Washington, D.C., W-1 interacted with a man named "Gray" and a woman named "Laura." W-1 did not know their last names. W-1 identified "Gray" as Young, based on the above photograph of Young inside the Capitol Rotunda that was distributed to the public by the FBI.
- b) W-1 identified "Laura" as Steele from a photograph taken inside a van along with several other individuals travelling from North Carolina to Washington, D.C., on January 5, 2021:



- c) According to W-1, Young and Steele stated that they were members of the Oath Keepers and that they were in Washington, D.C., to provide security at the Capitol.
- d) W-1 stated Young and Steele stated they rode the Metro into Washington D.C. on the morning of January 6, 2021. W-1 was included in a group text message chain with Young, Steele, and others that included phone number XXX-XXX-7828.

45. Law enforcement was able to identify Laura Steele and Graydon Young in surveillance video from the Washington Metro Area Transit Authority, traveling from Springfield, Virginia, to Washington D.C. on the morning of January 6, 2021. A photograph is produced below, with Steele on the left and Young on the right:



46. Pursuant to legal process, law enforcement obtained from Google records showing both Young and Steele applying for membership with the Florida chapter of the Oath Keepers.
- a) On December 3, 2020, Young, from an email address containing the name “graydonpyoung” and using his true name and phone number (XXX-XXX-9876), wrote an email to the Florida chapter of the Oath Keepers, “looking to get involved in helping....” Young attached a membership application to his email.
 - b) On January 3, 2021, Steele, from an email address containing the name

“laura.steele” and using her true name and phone number (XXX-XXX-7828), and copying the email address “graydonpyoung,” wrote an email to the Florida chapter of the Oath Keepers that stated, “My brother, Graydon Young told me to submit my application this route to expedite the process.” Steele attached a membership application (discussed further below) to her email.

47. On January 4, 2021, Young forwarded an email to Steele. The original email, also sent on January 4, 2021, was from oathkeepers.org and had the following subject line: “Call To Action: Oath Keepers Deploying to DC to Protect Events, Speakers, & Attendees on Jan 5-6: Time to Stand!” The email was signed by Person One, and stated in part, “As we have done on all recent DC Ops, we will also have well armed and equipped QRF teams on standby, outside DC, in the event of a worst case scenario, where the President calls us up as part of the militia to to [sic] assist him inside DC.” The email also stated, “As always, while conducting security operations, we will have some of our men out in ‘grey man’ mode, without identifiable Oath Keepers gear on. For every Oath Keeper you see, there are at least two you don’t see.”

Probable Cause – Graydon Young

48. Law enforcement was able to identify Young in additional photographs in Washington, D.C., prior to his entry into the U.S. Capitol on January 6, 2021. Two photographs are produced below:

a.



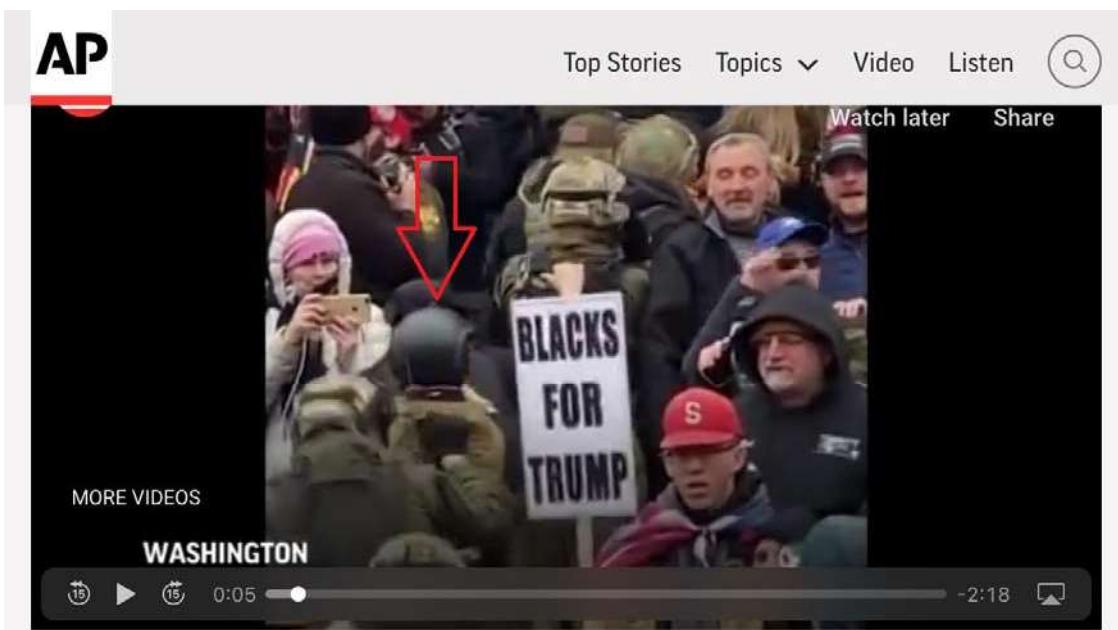
b. Young circled in red; Kelly Meggs circled in purple, facing Young



49. The above photographs show Young with a group of several other people wearing tactical gear, including some with writing that says “Oath Keepers” and “Florida.”

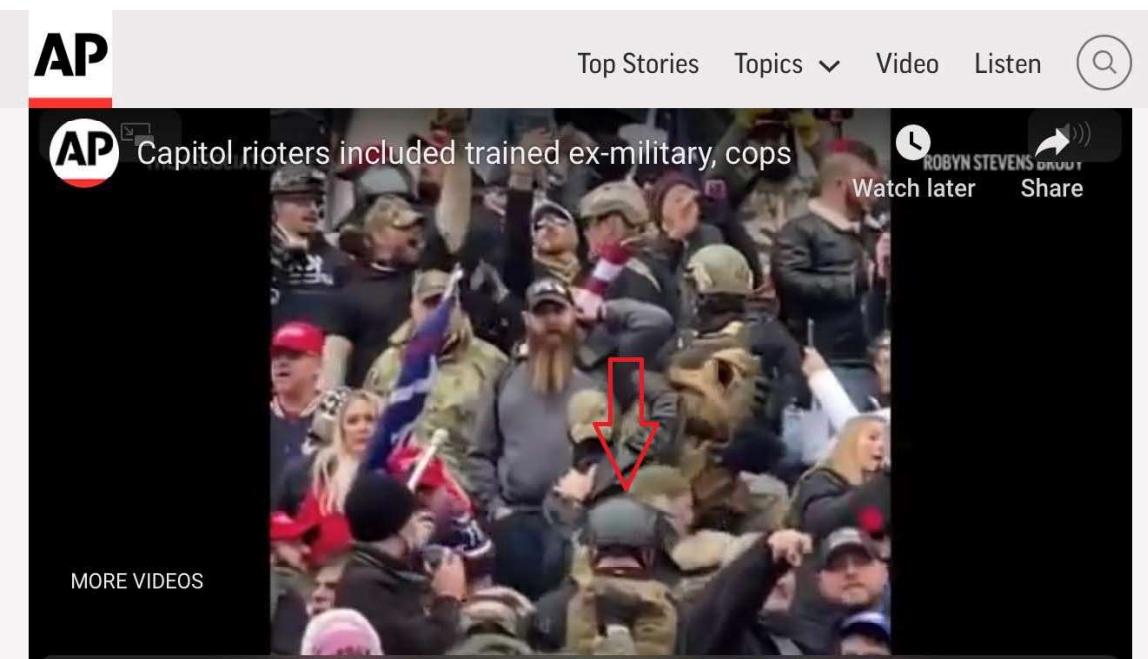
50. The Associated Press published a video capturing some of the civil unrest at the U.S. Capitol.⁹ In the video, Young is seen with a group of people, dressed similarly and in a military-style “stack” formation, with hands on each other’s backs or flak jackets, some with obvious Oath Keeper insignias visible on their clothing, moving up through the crowd towards the door of the U.S. Capitol. Below are two screenshots of the video (with red arrows added to identify the particular person as he moves up through the crowd):

a.



⁹ The video is available at the following link, at slide 10: <https://apnews.com/article/ex-military-cops-us-capitol-riot-a1cb17201dfddc98291ebed5badc257>.

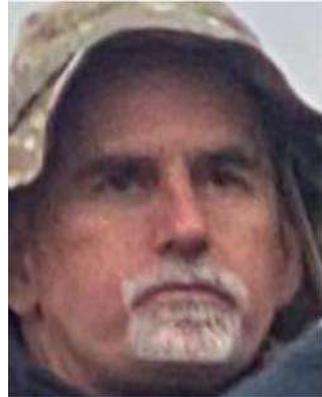
b.



51. Law enforcement has identified Young in the video based in part on his clothing (black tactical helmet, black long-sleeved shirt, camouflaged tactical vest) and in part on photos of his association with other members of the Oath Keepers outside the U.S. Capitol prior to the group walking as a "stack" up the steps.

52. Notably, while travelling into Washington, D.C. and then congregating with the other members of the Oath Keepers outside the U.S. Capitol, Young was wearing a "boonie" hat (a wide-brim military-style hat) on his head. Prior to making entry into the U.S. Capitol, Young changed his headgear to a black tactical helmet. Compare the following photos of Young outside the U.S. Capitol to inside the U.S. Capitol:

a. Outside Capitol



b. Inside Capitol



53. Based on database information, Young is affiliated with the following phone number: XXX-XXX-9876.

54. According to an online database, the carrier for phone number XXX-XXX-9876 is AT&T. Pursuant to an authorized search warrant, law enforcement obtained records from AT&T for cell towers providing service to the United States Capitol. The device associated with phone number XXX-XXX-9876 was identified as having utilized a cell site consistent with providing service to the geographic area that includes the interior of the United States Capitol building in and around the time of the attack on the Capitol on January 6, 2021.

55. Pursuant to legal process, law enforcement obtained records from AT&T showing

that the device associated with phone number XXX-XXX-9876 was located in the Englewood area of Florida from January 1 to 4, 2021. The device travelled to the Thomasville¹⁰ area of North Carolina on January 4, 2021, left Thomasville on the morning of January 5, was in downtown Washington, D.C. on the evening of January 5, stayed overnight in Springfield, Virginia, the night of January 5, and was again in downtown Washington, D.C. during the day on January 6. The device left the Washington, D.C. area the evening of January 6, arrived in Thomasville just after midnight, and remained in Thomasville through the morning on January 8, when it travelled back to the Englewood area of Florida (arriving the evening of January 8).

56. Pursuant to legal process, law enforcement obtained records from Delta, which show that on December 22, 2020, Young purchased tickets to fly from Tampa, Florida, to Greensboro, North Carolina, on January 4, 2021, with a return trip on January 8, 2021. Young took the flight on January 4, but instead of flying home on January 8, appears to have changed plans and driven home.

57. Pursuant to legal process, law enforcement obtained records from Google, which show in Young's email archive a receipt dated January 11, 2021, for towing a vehicle – a 2012 Chrysler Town and Country that is registered to Steele's home address in Thomasville, North Carolina – from a location in Florida (near I-75, near Young's listed address) to Steele's home address in Thomasville, North Carolina.

58. The Department of Defense reports that Young previously served in the U.S. Army Reserve and the U.S. Navy Reserve.

¹⁰ As described below, Young's sister Steele lives in Thomasville, North Carolina.

59. Young is a licensed driver in the state of Florida. FBI Special Agent Wren has studied Young's Florida driver's license photograph and determined that Young is the person who appeared in photographs described above.¹¹

60. Consistent with the information provided by W-2, legal process received from Facebook confirms that the Facebook account with vanity name "gray.p.young" was closed on January 8, 2021 (two days after the civil unrest at the Capitol). Facebook records also confirmed the following information: an email address containing the name "graydonpyoung" at a well-known email provider was one of two email addresses used to register Young's Facebook account. The Facebook account was registered on December 23, 2008, with phone number XXX-XXX-9876, the same number affiliated with Young through the above-referenced database search.

61. Records received from Facebook also revealed that Young's Instagram account was registered using the same XXX-XXX-9876 number. Likewise, the Instagram account was registered with the same email address that included Young's name. The account was registered on August 8, 2018, and closed on January 13, 2021, one week after the civil unrest at the Capitol.

62. Records received from Facebook show that, on the evening of January 6, 2021, Young posted on Facebook: "We stormed and got inside."

¹¹ Your Affiant notes the following information. First, on or around January 14, 2021, after receiving an internet tip and viewing similar photographs and video of Young from the civil unrest on January 6, 2021, an FBI agent drafted an arrest warrant for an individual (Subject-1) other than Young, based on a review of Subject-1's driver's license photo and the fact that Subject-1 was affiliated with the Oath Keepers. An FBI agent in Kansas City, Missouri, who was familiar with Subject-1, then determined that Subject-1 was not the individual depicted in the photos at the U.S. Capitol on January 6, 2021. The government did not pursue charges against Subject-1. Second, on or around January 15, 2021, a concerned citizen provided the FBI with a tip that the photograph of Young in the Rotunda was a photograph of Subject-2, who was a co-worker of the concerned citizen in Illinois. On January 18, 2021, SA Wren spoke with the concerned citizen, who stated that Subject-2 had quit the job and moved to Colorado, and "seemed like the type" who would have gone to the Capitol. SA Wren reviewed Subject-2's driver's license photo and determined that Subject-2 is not the person depicted in the photographs of Young at the U.S. Capitol.

63. Records received from Facebook show that, on November 7, 2020, Young posted a message in a Facebook group called “War of Northern Aggression” in which Young wrote: “Will this group consider migration to MeWe and Parler? I think censorship is going to get worse with Biden win.” Two days later, Young posted in the same group: “Admins : please create this page on MeWe.”

64. Records received from Facebook show that, on November 30, 2020, Young commented on a post: “I already have MeWe and Parler ...waiting for this drama to end before I delete my FB account.”

65. Records received from MeWe show that one MeWe accountholder appears to be Young: MeWe lists the user’s name as “Grau Young” with the same associated phone number as XXX-XXX-9876.

Probable Cause – Laura Steele

66. Based on database information, the phone number XXX-XXX-7828 is affiliated with Laura Steele of Thomasville, North Carolina.

67. According to an online database, the carrier for phone number XXX-XXX-7828 is AT&T. Pursuant to an authorized search warrant, law enforcement obtained records from AT&T for cell towers providing service to the United States Capitol. The device associated with phone number XXX-XXX-7828 was identified as having utilized a cell site consistent with providing service to the geographic area that includes the interior of the United States Capitol building in and around the time of the attack on the Capitol on January 6, 2021.

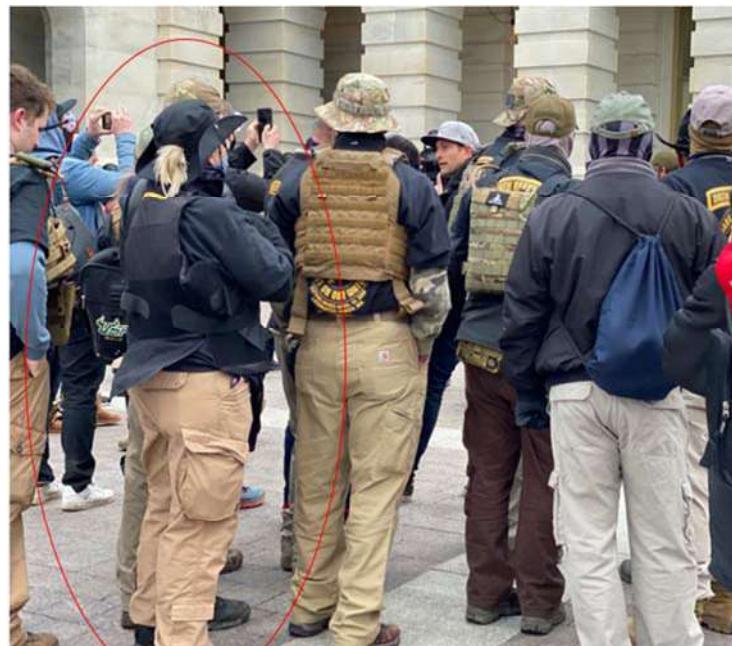
68. Your affiant was able to review a photograph associated with Laura Steele’s driver’s license information from North Carolina, and confirmed that Steele appears to be the person depicted in the photographs within the Metro system and at the Capitol.

69. On January 6, 2021, prior to entering the U.S. Capitol, Laura Steele was with a group of individuals wearing camouflaged-combat attire:

a.



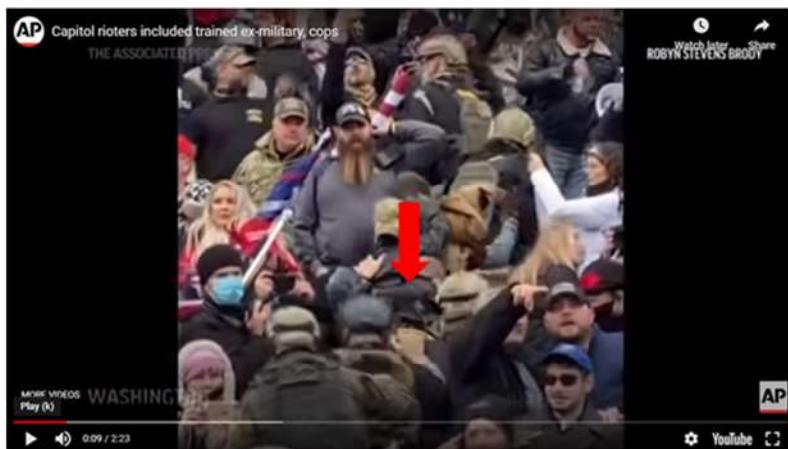
b.



70. The above photographs show Laura Steele with a group of several other personnel wearing tactical gear, including some with writing that says “Oath Keepers” and “Florida.”

71. As described above, the Associated Press published a video capturing some of the civil unrest at the U.S. Capitol.¹² In the video, Laura Steele is seen with a group of personnel, dressed similarly and in a military-style “stack” formation, with hands on each other’s backs or flak jackets, some with obvious Oath Keeper insignias visible on their clothing, moving up through the crowd towards the door of the U.S. Capitol. Below are two screenshots of the video (with red arrows added to identify Steele as she moves up through the crowd):

a.



b.



¹² The video is available at the following link, at slide 10: <https://apnews.com/article/ex-military-cops-us-capitol-riot-a1cb17201dfddc98291edead5badc257>.

72. Law enforcement has identified Steele in the video based in part on her clothing (black boonie cap, black long-sleeved shirt, blonde ponytail), in part on her stature, and in part on photos of her association with other members of the Oath Keepers outside the U.S. Capitol prior to the group walking as a “stack” up the steps.

73. Law Enforcement was able to identify Steele from video surveillance footage inside the U.S. Capitol Rotunda, based in part on her clothing and proximity to other members of the Oath Keepers inside the Rotunda.

a.



b.



74. As described above, in response to legal process, law enforcement received from Google a five-page document that appears to be a membership application and vetting form that Laura Lee Young¹³ Steele submitted to the Oath Keepers of Florida on January 3, 2021. On the form, Laura Steele provided a phone number of XXX-XXX-7828, an email address of “laura.steele” at a well-known email provider, and her home address in Thomasville, North Carolina. Under the section for “CPT Skill Sets (Community Preparedness Team) Experience or Interests,” she checked “Security.” Under “Skillsets,” she wrote: “I have 13 years of experience in Law Enforcement in North Carolina. I served as a K-9 Officer and a SWAT team member. I currently work Private Armed Security for [company name redacted]. I am licensed PPS through the North Carolina Private Protective Services.”

75. In the form, Laura Steele also provided her North Carolina driver’s license number (which matches the information received from North Carolina) and her North Carolina Private Protective Services (PPS) license number.

76. In response to legal process, law enforcement received from MeWe information that showed that the MeWe user Laura Steele had no registered phone number, but had a registered email address that matched the one provided by Laura Steele on her application/vetting form to the Oath Keepers of Florida.

77. In response to legal process, law enforcement received from Google information that showed that the Google user Laura Steele had a registered phone number of XXX-XXX-7828 and a registered email address that matched the one provided by Laura Steele on her application/vetting form to the Oath Keepers of Florida.

¹³ A database search shows that Laura Steele went by the name Laura Young prior to getting married.

Probable Cause – Kelly Meggs

78. Pursuant to legal process, the government obtained Google email records for Young.¹⁴ In an email sent on January 8, 2021, Young wrote that Young’s “team leader” during the civil unrest at the Capitol went by the call sign “OK Gator 1,” with a phone number of XXX-XXX-0600.¹⁵

79. A database search showed that phone number XXX-XXX-0600 is associated with Kelly Meggs at an address in Dunnellon, Florida.

80. Records retrieved from Jessica Watkins’s cell phone show a contact with the name “FL Kelly Meggs – Oathkeepers” associated with the same phone number XXX-XXX-0600.

81. Pursuant to legal process, the government obtained records from Verizon Wireless, which showed that phone number XXX-XXX-0600 is registered to Kelly Meggs’s wife, Connie Meggs, at the same address in Dunnellon, Florida.¹⁶

82. Pursuant to legal process, the government obtained records from Facebook, which show that phone number XXX-XXX-0600 is the verified phone number for a Facebook account registered to Kelly Meggs and with a registered email address of “kellymeggs” at a well-known email provider. The Facebook records also show that the account, which had been registered in October 2008, was closed on January 21, 2021.

83. Pursuant to legal process, the government obtained records from Facebook, which

¹⁴ Information about this email is included herein solely as evidence against Kelly Meggs. At the present time, the government is not seeking to use this email as evidence against Young.

¹⁵ In the same email, Young wrote that the phone number for “OK Gator 1” was XXX-XXX-0609 (with the first six digits being identical). The FBI assesses that the terminal “9” was likely a typo instead of “0,” because there are records of multiple phone calls in January 2021 between Young and XXX-XXX-0600 but no phone calls between Young and XXX-XXX-0609.

¹⁶ Records from Verizon show that there are five phone numbers on this account, including XXX-XXX-8614, which is Connie Meggs’s suspected phone number (as described below).

show that phone number XXX-XXX-0600 is the verified phone number for an Instagram account registered to Kelly Meggs and with a registered email address of “kellymeggs” at a well-known email provider.

84. According to an online database, the carrier for phone number XXX-XXX-0600 is Verizon. Pursuant to an authorized search warrant, law enforcement obtained records from Verizon for cell towers providing service to the United States Capitol. The device associated with phone number XXX-XXX-0600 was identified as having utilized a cell site consistent with providing service to the geographic area that includes the interior of the United States Capitol building in and around the time of the attack on the Capitol on January 6, 2021.

85. The public MeWe profile picture for a user with the name Kelly Meggs, who is wearing an apparent Oath Keepers uniform consisting of camouflaged-combat attire, is included below:



KELLY MEGGS

86. In addition, the following photo is on the public MeWe account for user Kelly Meggs:



87. Pursuant to legal process, the government obtained records from MeWe showing that the user Kelly Meggs has a registered email address of "kellymeggs" at a well-known email provider and no registered phone number.

88. According to an internet search, Kelly Meggs is the general manager of a car dealership in Lake City, Florida.

89. Your affiant was able to obtain records, including a photograph of Kelly Meggs, from the Florida Department of Motor Vehicles, and confirmed that Kelly Meggs appears to be the person depicted in the photographs at the Capitol.

90. The following photograph was taken by a photojournalist on January 5, 2021 (the day prior to Kelly Meggs and others attacking the Capitol), and made available online with the caption, "A member of the right-wing group Oath Keepers stands guard during a rally in front of the U.S. Supreme Court Building on January 5, 2021 in Washington, DC" ¹⁷:

¹⁷ <https://www.gettyimages.com/detail/news-photo/member-of-the-right-wing-group-oath-keepers-stands-guard-news-photo/1294712646>.



91. The ballistic vest and sunglasses from Kelly Meggs's MeWe profile appear to be identical to the ones found in the above photo. The two photos also show similar ballistic vest configurations, with black back straps, three camouflage pouches at the bottom, and a black and yellow Oath Keepers logo on the top.

92. On January 29, 2021, the New York Times published an article entitled "Tracking the Oath Keepers Who Attacked the Capitol"¹⁸ that used open-source photographs to track the movements of several individuals wearing Oath Keepers paraphernalia and equipment who participated in the attack on the Capitol on January 6, 2021. One image published by the New York Times appears to be that of Kelly Meggs:



93. One of the New York Times images shows an individual matching the description of Kelly Meggs in a military-style "stack" formation moving up through the crowd towards the

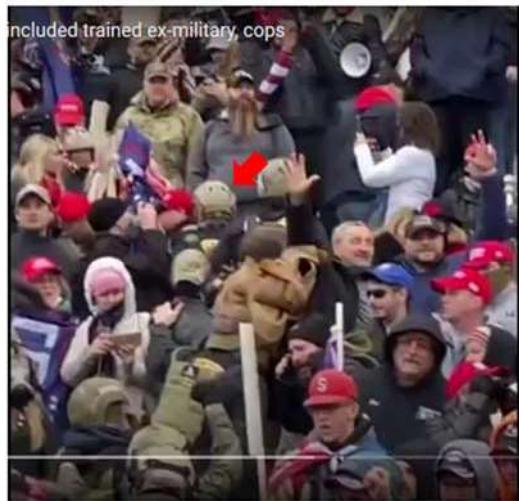
¹⁸ <https://nytimes.com/interactive/2021/01/29/us/oath-keepers-capitol-riot.html>.

door of the Capitol:¹⁹



94. An AP News article contained a video of the same maneuver up the Capitol Steps.²⁰

A screenshot from the video shows Kelly Meggs (identified with the red arrow):



¹⁹ The coloring and circles are in the original article. The red arrow was added to identify Kelly Meggs from the other participants.

²⁰ <https://apnews.com/article/ex-military-cops-us-capitol-riot-a1cb17201dfddc98291edead5badc257>

95. Surveillance video from inside the Capitol on January 6, 2021, also shows a person consistent with Kelly Meggs, along with other members of the Oath Keepers:



96. Records obtained from the Comfort Inn in Arlington, Virginia, show that a credit card belonging to Kelly Meggs was used to pay for a room at the hotel on the nights of January 5 and 6, 2021.²¹ The room, with two queen beds, was booked in the name of a different person suspected of being affiliated with the Oath Keepers. As noted above, records and video show that other members of the Oath Keepers who participated in the attack on the U.S. Capitol Building on January 6, 2021, including Jessica Watkins, Donovan Crowl, and Thomas Caldwell, stayed at the Comfort Inn in Arlington on the night of January 5, 2021.

Probable Cause – Connie Meggs

97. According to a government database, Connie Meggs shares the same address as Kelly Meggs, located in Dunnellon, Florida.

²¹ Pursuant to legal process, the government obtained records from Bank of America, which show two charges to the Comfort Inn on January 5, 2021, each for \$224. The records also show that on January 7, 2021, Kelly Meggs paid a charge of \$302 to the Hilton Garden Inn, located at 1225 First Street NE, Washington, D.C.

98. Your affiant has reviewed records, including a driver's license photograph from the Florida Department of Motor Vehicles, and confirmed that Connie Meggs appears to be the person depicted in the photographs at the Capitol.

99. An individual matching the description of Connie Meggs also appears in the previously mentioned New York Times article, "Tracking the Oath Keepers Who Attacked the Capitol." This individual matches Connie Meggs's description, though her face is obscured:



100. The pictured individual appears to be wearing the same tan hat and distinctive mirrored aviator sunglasses as the woman who appears next to Kelly Meggs in Kelly Meggs's MeWe account photo:



101. In the below photo from the New York Times article, Connie Meggs can be identified within the group of other Oath Keepers by her tan hat, blonde ponytail, navy hood, black "USF"²² backpack, and height:²³

²² According to an open-source search, one of Connie Meggs's close relatives appears to be a student at the University of South Florida ("USF").

²³ In the photo, which appears to have been taken on January 6, 2021, at or near the Ellipse, Connie Meggs is wearing a tan baseball hat. In subsequent photos at or near the U.S. Capitol Building, Connie

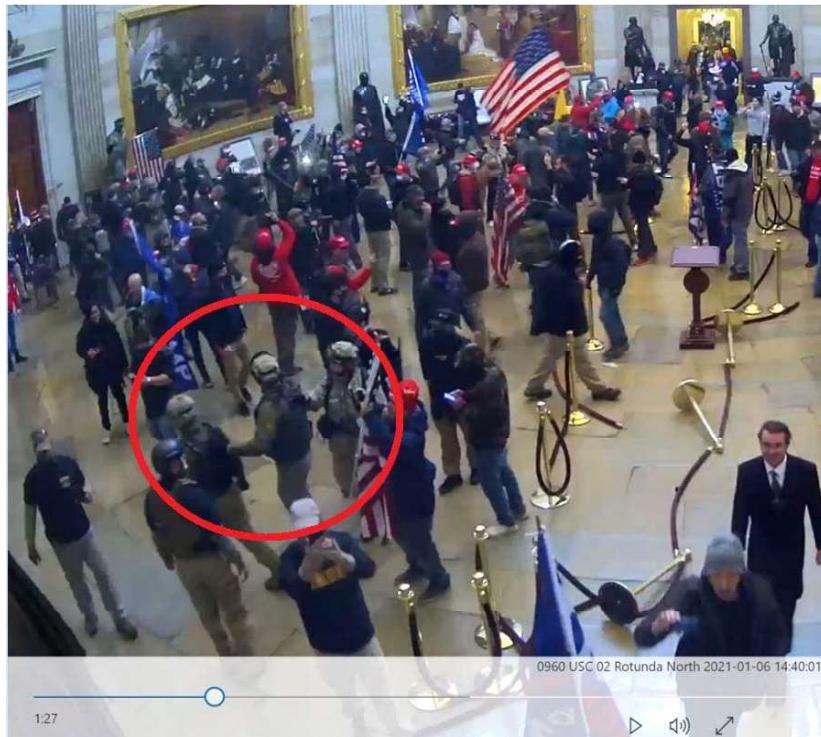


102. In a later photo from the New York Times article, Connie Meggs can be identified within the group of other Oath Keepers operating as part of the “stack” moving up the steps of the Capitol:



Meggs is wearing a military-style helmet. This is consistent with the actions of some other members of the Oath Keepers, who appear to have donned military-style uniforms (including vests and helmets) in between the rally at the Ellipse and attacking the Capitol.

103. Surveillance video from inside the U.S. Capitol Building on January 6, 2021, also shows a person consistent with Connie Meggs, along with other members of the Oath Keepers:



104. In other frames of surveillance video from inside the Capitol, a person matching Connie Meggs's frame and attire, including wearing a black backpack with "USF" logo, is visible:



105. Pursuant to legal process, the government obtained records from MeWe showing that the user with the name Connie Prosser²⁴ had an associated phone number of XXX-XXX-8614 and no associated email address.

106. Pursuant to legal process, the government obtained records from Facebook, which show that phone number XXX-XXX-8614 is the verified phone number for an account registered to Connie Prosser. The Facebook records also show that the account, which had been registered in November 2008, was closed on November 24, 2020.

107. According to an online database, the carrier for phone number XXX-XXX-8614 is Verizon Wireless. Pursuant to an authorized search warrant, law enforcement obtained records from Verizon Wireless for cell towers providing service to the United States Capitol. The device associated with phone number XXX-XXX-8614 was identified as having utilized a cell site consistent with providing service to the geographic area that includes the interior of the United States Capitol building in and around the time of the attack on the Capitol on January 6, 2021.

108. A person who will be referred to as W-3 provided the following information. W-3 is acquainted with Connie Meggs. W-3 reported that Connie Meggs volunteers at a thrift shop in Dunnellon, Florida. In November 2020, W-3 saw Connie Meggs wearing clothing with “Oath Keepers” written on it.

CONCLUSIONS OF AFFIANT

109. Based on the foregoing, I submit that there is probable cause to believe that Kelly Meggs, Connie Meggs, Graydon Young, and Laura Steele committed violations of 18 U.S.C. §§

²⁴ A database search suggests that Connie Meggs went by the name Connie Prosser prior to her first marriage.

2, 371, 1361, 1512(c)(2), and 1752(a)(1), (2), and that Graydon Young committed a violation of 18 U.S.C. § 1519.

110. As such, I respectfully request that the Court permit the filing of this Complaint.


SPECIAL AGENT WHITNEY DREW
FEDERAL BUREAU OF INVESTIGATION

Subscribed and sworn pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on February 11, 2021.



Robin M. Meriweather

Robin Meriweather 2021.02.11 23:54:59
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HON. ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE