AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.
CINDY YOUNG
DOB: XXXXXX

Defendant(s)

Case: 1:23-mj-00136
Assigned To : Harvey, G. Michael
Assign. Date : 6/21/2023
Description: Complaint W/ Arrest Warrant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of _____ in the _____ in the District of Columbia, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 1752(a)(1)	-Entering and Remaining in a Restricted Building or Grounds.
18 U.S.C. § 1752(a)(2)	- Disorderly and Disruptive Conduct in a Restricted Building or Grounds.
40 U.S.C. § 5104(e)(2)(D)	-Disorderly Conduct in a Restricted Building or Grounds.
40 U.S.C. § 5104(e)(2)(G)	-Parading, Demonstrating, or Picketing in any of the Capitol Buildings.

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

Complainant's signature

Wesley Garland , Special Agent
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 06/21/2023

G. Michael Harvey Digitally signed by G. Michael Harvey

Judge's signature

City and state: Washington, D.C.

G. Michael Harvey, U.S. Magistrate Judge
Printed name and title

Case: 1:23-mj-00136
Assigned To : Harvey, G. Michael
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STATEMENT OF FACTS

Your affiant, Wesley Garland, is a Special Agent assigned to the Federal Bureau of Investigation's (FBI) Boston Division/Bedford, New Hampshire (NH) office. In my duties as a Special Agent, I work on the Joint Terrorism Task Force ("JTTF"), with a focus on domestic terrorism cases. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of Federal criminal laws.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

At such time, the certification proceedings were still underway, and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

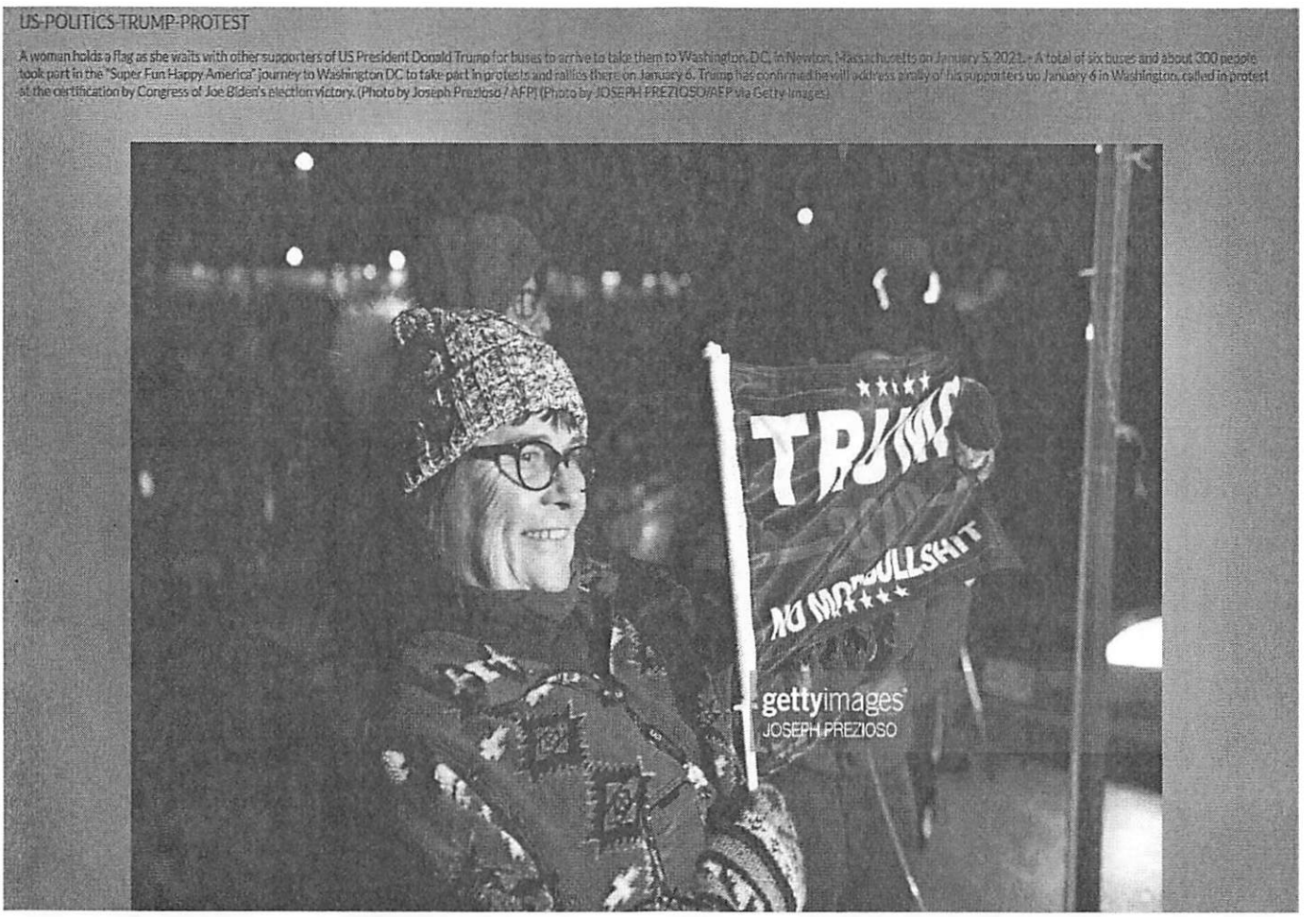
During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

CINDY YOUNG's Participation on January 6, 2021

This investigation began based on information that CINDY YOUNG was present inside the Capitol on January 6, 2021. Your affiant reviewed open-source media, CCTV, and spoke with CINDY YOUNG, all which confirmed her presence inside the Capitol on January 6, 2021.

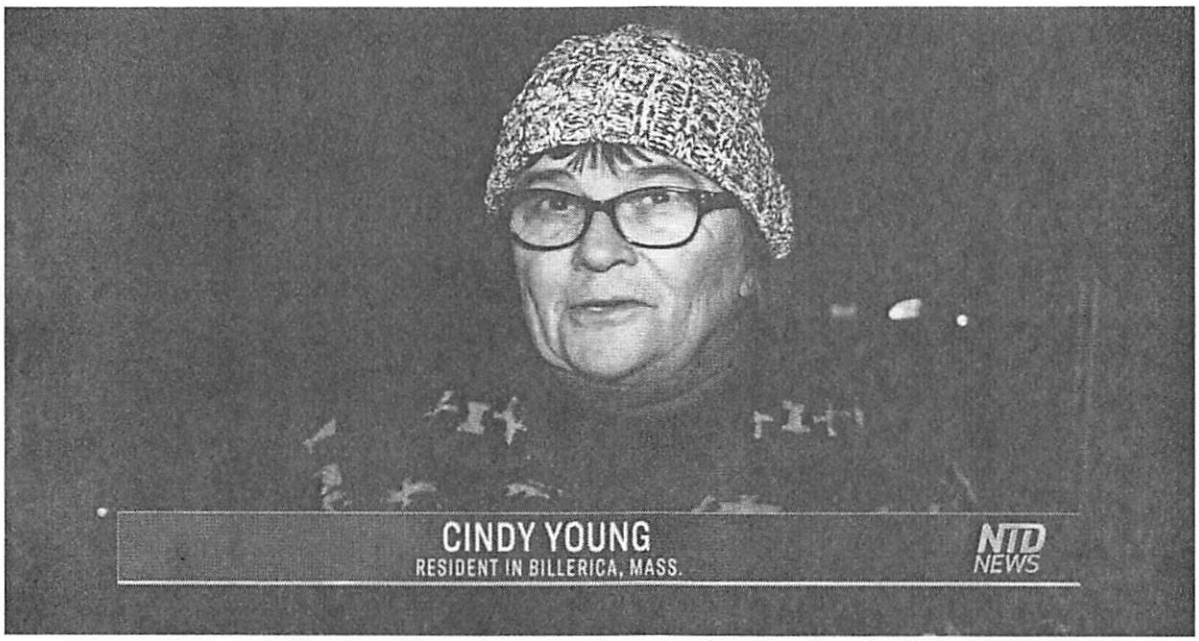
On January 5, 2021, six buses, organized by group "Super Happy Fun America", left Massachusetts to bring President Trump supporters to his rally and other scheduled protests. Image 1 shows CINDY YOUNG, at the pick-up location, wearing a bright red jacket with Aztec print while holding a Trump "NO MORE BULLSHIT" flag.

Image 1



CINDY YOUNG was interviewed by NTD News before she boarded one of the buses to Washington, D.C. During the interview she stated the country was "at a crossroad." Image 2 is a still from the interview.

Image 2



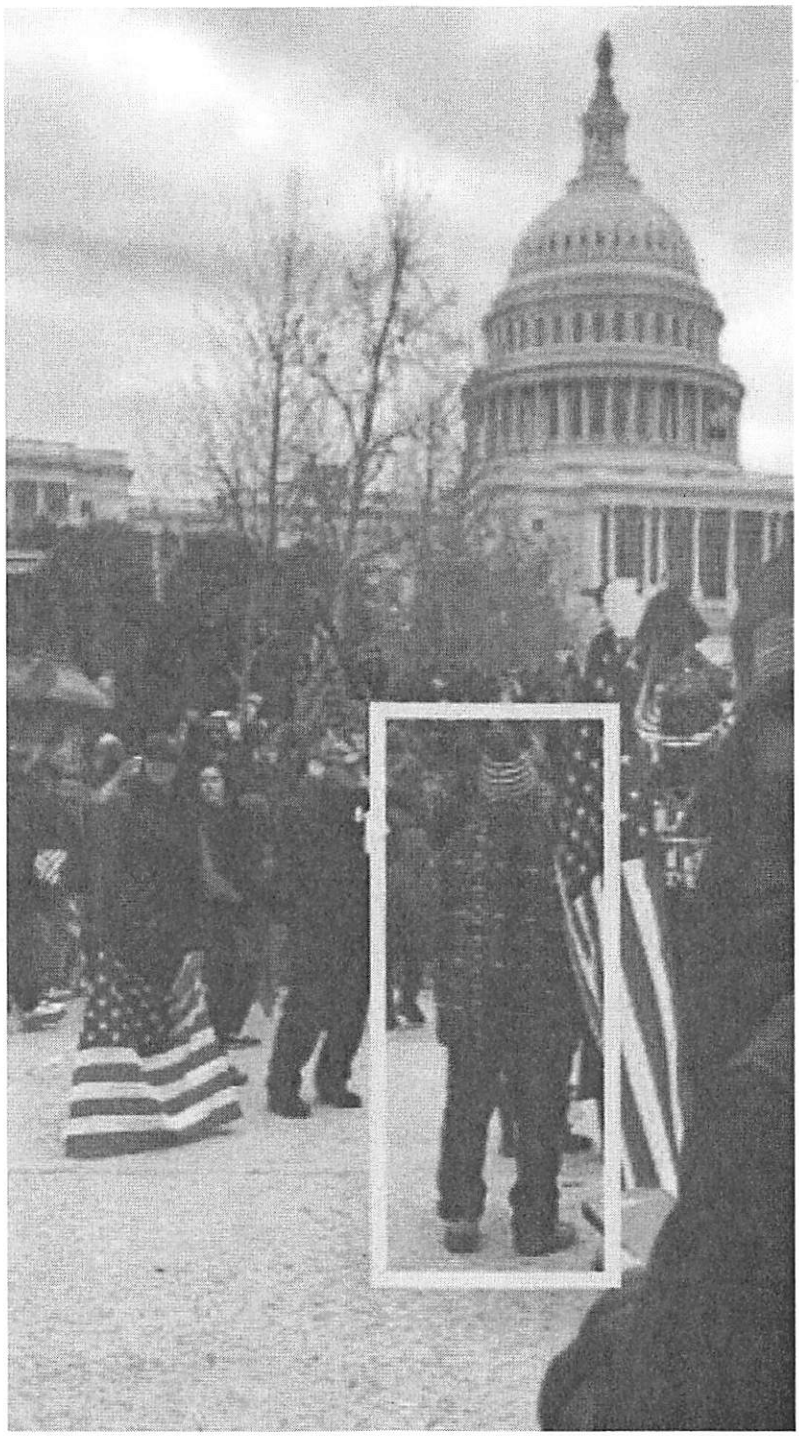
After attending President Trump's 'Stop the Steal' rally, CINDY YOUNG joined a large group in walking to the Capitol. Once on Capitol grounds, CINDY YOUNG (yellow box) scaled a staircase on the Northwest lawn, as the riot began to grow outside the building (Image 3).



Image 3

YOUNG can be seen, throughout the day, wearing the same jacket as her January 5th interview as well as sunglasses, a Trump 2020 scarf, and an American Flag 'Trump 2020' knit hat.

Image 4



At approximately 2:22PM, CINDY YOUNG entered the Capitol through the Senate Wing doors. Image 5 is a zoomed in still image from CCTV as YOUNG, circled, enters the Capitol.

Image 5



After entering, CINDY YOUNG traveled through varying areas of the Capitol. At some point, CINDY YOUNG came into possession of a Trump 2020 and an American flag, as seen in Image 6 and 7.

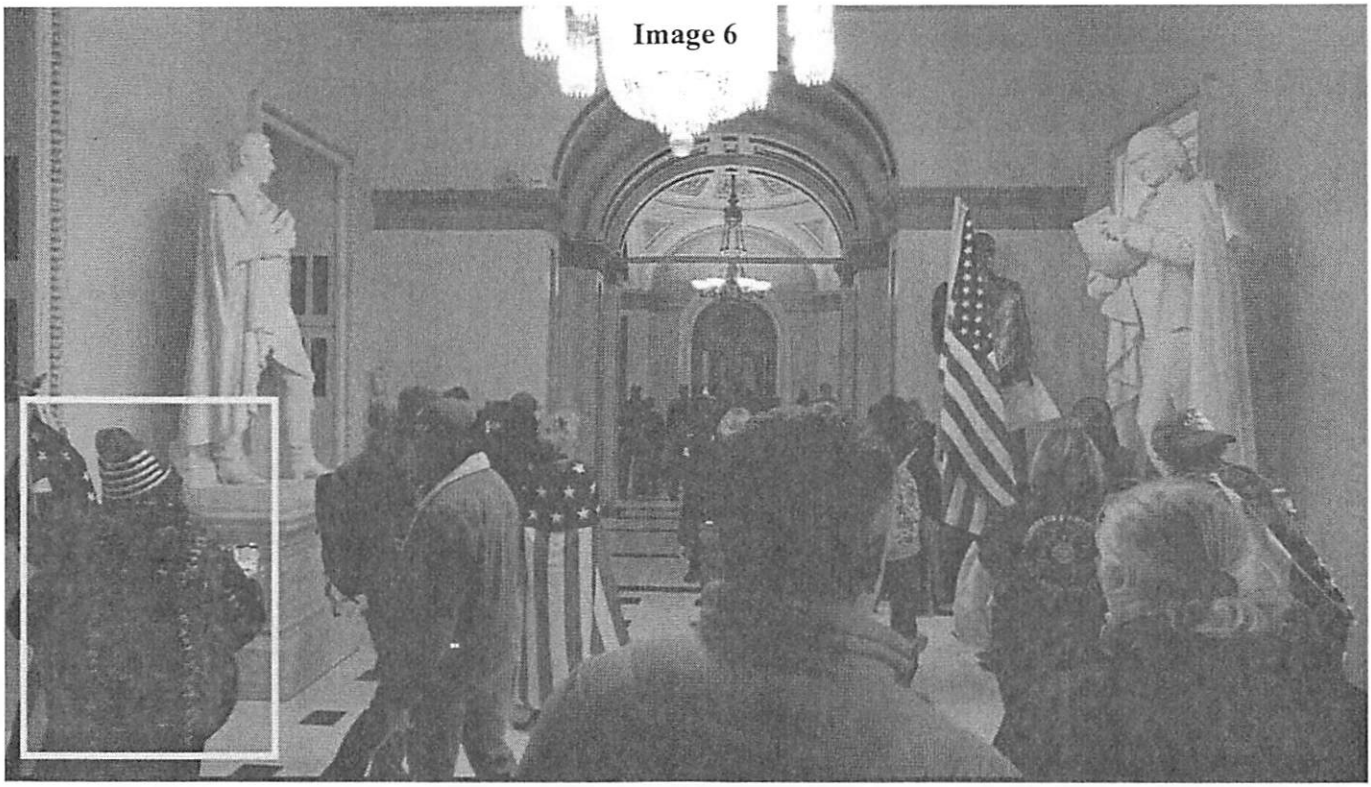


Image 6

CCTV captured CINDY YOUNG filming/photographing the Rotunda (Image 7).



Image 7

CINDY YOUNG is also captured standing in a crowd, outside the Chamber doors, which loudly chanted "break it down" (Image 8).



Image 8

Your affiant telephonically interviewed CINDY YOUNG on January 13, 2021, regarding a male who was arrested on January 6, 2021. YOUNG admitted to traveling to D.C., on the bus, with this male. YOUNG recounted she paid $75.00, roundtrip, for the bus ride to Washington, D.C., in order attend the Trump Rally. YOUNG likened the scene, on Capitol grounds, to a war zone. YOUNG admitted entering the Capitol and stated her goal was to get to the hearing room so that her voice might be heard.

YOUNG was again interviewed on February 11, 2022. Young admitted to going onto the Capitol grounds where "things got crazy." YOUNG again admitted to going inside the Capitol Building and herself in Image 8 saying "That is me standing near the hearing doors!". YOUNG also identified herself in Image 1 and 2. YOUNG, invited Agents to photograph her scarf (Image 9) and jacket (Image10) that she acknowledged wearing on January 6, 2021.

Image 9



Image 10



Based on the foregoing, your affiant submits that there is probable cause to believe that CINDY YOUNG violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a "restricted building" includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is also probable cause to believe that CINDY YOUNG violated 40 U.S.C. § 5104(e)(2)(D) and (G), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.

Wesley Garland
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 21st day of June 2023.

G. Michael Harvey
Digitally signed by G. Michael Harvey
Date: 2023.06.21 13:07:25 -04'00'

G. MICHAEL HARVEY
U.S. MAGISTRATE JUDGE

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.
CINDY YOUNG

Defendant

Case: 1:23-mj-00136
Assigned To : Harvey, G. Michael
Assign. Date : 6/21/2023
Description: Complaint W/ Arrest Warrant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) CINDY YOUNG ,

who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint

☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1752(a)(1) -Entering and Remaining in a Restricted Building or Grounds.
18 U.S.C. § 1752(a)(2)- Disorderly and Disruptive Conduct in a Restricted Building or Grounds.
40 U.S.C. § 5104(e)(2)(D) -Disorderly Conduct in a Restricted Building or Grounds.
40 U.S.C. § 5104(e)(2)(G) -Parading, Demonstrating, or Picketing in any of the Capitol Buildings.

Date: 06/21/2023

G. Michael Harvey
Digitally signed by G. Michael Harvey
Date: 2023.06.21 13:08:21 -04'00'

Issuing officer's signature

City and state: Washington, D.C.

G. Michael Harvey, U.S. Magistrate Judge
Printed name and title

Return

This warrant was received on *(date)* _____ , and the person was arrested on *(date)* _____
at *(city and state)* _____ .

Date: _____

Arresting officer's signature

Printed name and title