

UNITED STATES DISTRICT COURT

for the
District of Columbia

United States of America
v.

WILLIAM CHRESTMAN

Defendant(s)

Case: 1:21-mj-00218
Assigned to: Judge Faruqi, Zia M
Assign Date: 2/10/2021
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:

Table with 2 columns: Code Section and Offense Description. Rows include 18 U.S.C. § 371 (Conspiracy), 18 U.S.C. § 231(a)(3) (Civil Disorder), 18 U.S.C. § 1512(c)(2) (Obstruction of an Official Proceeding), 18 U.S.C. § 115(a)(1)(B) (Threatening to assault a Federal Law Enforcement Officer), 18 U.S.C. §§ 1752(a)(1) and (2) (Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority), and 40 U.S.C. §§ 5104(e)(2)(D) & (G) (Disorderly Conduct on Capitol Grounds).

This criminal complaint is based on these facts:

See the attached affidavit, which is incorporated herein by reference.

Continued on the attached sheet.

[Redacted signature area]

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: 02/10/2021

[Handwritten signature]

2021.02.10
15:38:39 -05'00'

Judge's signature

City and state: Washington, D.C.

Zia M. Faruqi, U.S. Magistrate Judge

Printed name and title

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

I, [REDACTED] being first duly sworn, hereby depose and state as follows:

**PURPOSE OF THE AFFIDAVIT**

1. This Affidavit is submitted in support of Criminal Complaint charging William CHRESTMAN, Christopher KUEHNE, Louis Enrique COLON, Felicia KONOLD, and Cory KONOLD (the "SUBJECTS") with violations of 18 U.S.C. §§ 371, 231(a)(3), 1512(c)(2), 1752(a)(1) and (2), and 40 U.S.C. §§ 5104(e)(2)(D) and (G) for their unlawful conduct at the U.S. Capitol on January 6, 2021. This Affidavit sets forth evidence that establishes probable cause that the SUBJECTS conspired together, and with others known and unknown, (i) to corruptly obstruct, influence, or impede an official proceeding before Congress, that is, the certification of the Electoral College, and (ii) to obstruct, impede, or interfere with a law enforcement officer during the commission of a civil disorder.

2. As described in detail herein, the SUBJECTS did advance together as they unlawfully entered the grounds of the U.S. Capitol and the Capitol building itself. The SUBJECTS did then proceed to act in concert to prevent law enforcement officers from controlling the crowd by obstructing metal barriers that had been deployed to prevent the crowd's further advancement into other areas of the Capitol building. The SUBJECTS not only moved closely to each other in proximity, but also appeared to gesture and communicate to one another both before and while inside the Capitol in an apparent effort to coordinate their efforts. In addition, one subject, KUEHNE, carried rolls of fluorescent orange tape. As shown in images throughout this Complaint, strips of similar-style orange tape were strategically worn by each of the SUBJECTS as well as others in the crowd. As further evidence of the SUBJECTS' coordination and planning, CHRESTMAN, KUEHNE, and COLON wore tactical style gear, including helmets and gloves,

and CHRESTMAN arrived at the Capitol with a respirator and wooden club or axe handle disguised as a flag.

3. In addition to the charges described above, for his individual actions, this Affidavit is submitted in support of Criminal Complaint charging William CHRESTMAN with violations of 18 U.S.C. § 115(a)(1)(B) for his threats to assault a Federal law enforcement officer, and 18 U.S.C. §§ 1752(a)(1) – (2), 1752(b)(1)(A) for the use and carrying of a dangerous weapon during the commission of the offense.

### **BACKGROUND OF AFFIANT**

4. Your affiant has been a Special Agent with the Federal Bureau of Investigation (“FBI”) since 2016. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of a violation of Federal criminal laws. In addition to my regular duties, I am a tasked with investigating criminal activity 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 to support an application for an arrest warrant, 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.

### **STATEMENT OF FACTS SUPPORTING PROBABLE CAUSE**

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

to members of the public.

7. 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.

8. As the proceedings continued in both the House and the Senate, and with Vice President 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.

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

10. 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

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 U.S. Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

11. In the course of these events, approximately 81 members of the Capitol Police and 58 members of the Metropolitan Police Department were assaulted. Additionally, one subject was shot and killed while attempting to enter the House chamber through broken windows; 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.

12. During national news coverage of the aforementioned events, video footage and images 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.

#### *The Subjects*

13. Your affiant reviewed various forms of open source videos and photographs of individuals who were engaged in unlawful activity at the Capitol on January 6, 2021. As described in detail herein, your affiant has identified a group of five subjects who acted in concert to achieve unlawful purposes. As previously introduced, the SUBJECTS acted together to obstruct law enforcement on the Capitol grounds and inside the Capitol during a civil disorder, and to obstruct Congress's certification of the Electoral College vote.<sup>1</sup>

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<sup>1</sup> Your affiant believes that there may be more persons involved in this particular conspiracy than the persons described throughout this affidavit, and the investigation is ongoing.

14. The first subject can be seen in an image below (as captured on January 6, 2021) dressed in a black baseball hat, black framed glasses, a black sweatshirt, black boots, tan gloves, green and tan camouflage pants, and a green tactical vest. The subject was also carrying what appeared to be a wooden club or axe handle, which was initially disguised as a blue flag. Your affiant has reason to believe this person is William CHRESTMAN (“CHRESTMAN”) based on the comparisons discussed herein. Among other things, your affiant has compared images from CHRESTMAN’s database records, including DMV records, to several images and videos from the events at the Capitol.<sup>2</sup> Based on these same records, your affiant has determined that CHRESTMAN currently resides in the Kansas City, Kansas metropolitan area. According to records produced by CHRESTMAN’s wireless cell phone provider in response to legal process, CHRESTMAN is listed as the owner of a cell phone number (“CHRESTMAN cell”). Lawfully-obtained Google records show that a Google account associated with the CHRESTMAN cell number was connected to Google services and was present in or around the U.S. Capitol on January 6, 2021.

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<sup>2</sup> In the days following January 6, 2021, some public users on social media, specifically Twitter, misidentified CHRESTMAN as Gavin McInnes, the founder of the Proud Boys. Though this was a misattribution, your affiant submits that CHRESTMAN does have similar facial features to Gavin McInnes. A video link to a story featuring an interview with McInnes from ABC news can be found at this link: <https://abcnews.go.com/Nightline/video/proud-boys-founder-feels-responsible-controversial-behavior-59766444>.



15. The second subject can be seen in an image below (as captured on January 6, 2021) wearing a tan helmet with orange tape affixed to the top and back, a black and tan face mask, a black jacket, tan pants, orange-tinted sunglasses, and a black backpack with two rolls of orange tape hanging from the back. Your affiant has reason to believe the person pictured below is Christopher KUEHNE (“KUEHNE”) based on the investigation discussed herein. Among other things, your affiant conducted a law enforcement database check and compared images of KUEHNE, including his DMV records, to several images and videos from the events at the Capitol. Based on these same records, KUEHNE also resides in the Kansas City, Kansas metro area. According to records produced by KUEHNE’s wireless telephone provider in response to legal process, KUEHNE is listed as the owner of a cell phone number (“KUEHNE cell”). Law enforcement databases consistently attributed that particular phone number to KUEHNE. Lawfully obtained cell site data indicates that a cell phone associated with KUEHNE’s cell number was present in or around the U.S. Capitol on January 6, 2021.



16. The third subject can be seen in an image below (as captured on January 6, 2021) wearing a black helmet with orange tape affixed to the front and the back, an American flag pattern face mask, an orange hooded sweatshirt, black sunglasses, black pants, black gloves, and a black backpack with red bandana tied to the back of the backpack. Your affiant has reason to believe this person is Louis Enrique COLON (“COLON”) based on the investigation discussed herein. Among other things, your affiant conducted a law enforcement database check and compared images of COLON, including his DMV records. According to databases available to law enforcement, COLON is also believed to reside in the Kansas City, Missouri metro area. According to records produced by COLON’s wireless telephone provider in response to legal process, COLON is listed as the owner of a cell phone number (“COLON cell”). Lawfully obtained cell site data indicates that a cell phone associated with COLON’s cell phone number was present in or around the U.S. Capitol on January 6, 2021.



17. The fourth subject can be seen in an image below (as captured on January 6, 2021) wearing a tan baseball hat with orange tape affixed to the top and brown braided ponytail, a green scarf, and black jacket, tan pants, tan and gray shoes, and a black backpack. Your affiant has reason to believe the person pictured below is Felicia KONOLD (“FELICIA KONOLD”) based on the comparisons discussed herein. Among other things, your affiant has compared images in FELICIA KONOLD’s database records, including DMV records, to several images and videos from the events at the Capitol. According to law enforcement records, FELICIA KONOLD resides in the Tuscon, Arizona metro area. Additional law enforcement database checks associated a phone number (hereinafter, the “FELICIA KONOLD cell”) with FELICIA KONOLD. Additionally,

during a voluntary interview with the FBI on or about January 28, 2021, FELICIA KONOLD was reached telephonically via the FELICIA KONOLD cell. Lawfully obtained cell site data indicates that a cell phone associated with FELICIA KONOLD's cell phone number was present in or around the U.S. Capitol on January 6, 2021.



18. The fifth subject can be seen in an image below (as captured on January 6, 2021) wearing a black and grey baseball hat with orange tape affixed to the top, glasses, a red scarf, tan hooded jacket, and grey pants. Your affiant has reason to believe the person pictured below is Cory KONOLD (“CORY KONOLD”) based on the comparisons discussed herein. Among other things, your affiant has compared images in CORY KONOLD's database records, including DMV records, to several images and videos from the events at the Capitol. CORY KONOLD is the brother of FELICIA KONOLD. Lawfully-obtained cell site records indicated that the FELICIA KONOLD cell called a number associated with CORY KONOLD while in or around the Capitol on January 6, 2021.



*The Group's Affiliation with the Proud Boys*

19. Proud Boys is a nationalist organization with multiple U.S. chapters and potential activity in other Western countries. The group describes itself as a “pro-Western fraternal organization for men who refuse to apologize for creating the modern world; aka Western Chauvinists.” Proud Boys members routinely attend rallies, protests, and other First Amendment-protected events, where they sometimes engage in violence against individuals whom they perceive as threats to their values. The group has an initiation process for new members, who often wear yellow and black polo shirts or other apparel adorned with the Proud Boys logo to events.

20. Beginning as early as December 2020, public communications from Proud Boys organizers encouraged members of the Proud Boys to attend the January 6, 2021, demonstration in Washington, D.C. Such communications included messages sent by the self-described chairman of the Proud Boys, Enrique Tarrío. For example, on or about December 29, 2020, Tarrío posted a message on the social media site Parler about the demonstration planned for January 6, 2021.

Among other things, Tarrío announced that the Proud Boys would “turn out in record numbers on Jan 6th but this time with a twist... We will not be wearing our traditional Black and Yellow. We will be incognito and we will be spread across downtown DC in smaller teams. And who knows....we might dress in all BLACK for the occasion.” I believe the statement about dressing in “all BLACK” is a reference to dressing like the group known as “Antifa,” who the Proud Boys have identified as an enemy of their movement and who are frequently depicted in the media clad in black clothing. Your affiant understands that the post was accessible to any users or guests of Parler’s site, and it was reported in the media.

21. On or around the same day, Joseph Biggs, a self-described organizer of the Proud Boys, posted a similar message on Parler in which he stated, among other things, “We will not be attending DC in colors. We will be blending in as one of you. You won’t see us. You’ll even think we are you . . . We are going to smell like you, move like you, and look like you. The only thing we’ll do that’s us is think like us! Jan 6th is gonna be epic.” I understand that, in referring to “you” Biggs was directing these statements at “Antifa,” who are frequently depicted in the media as wearing black clothing at rallies and counter-protests.

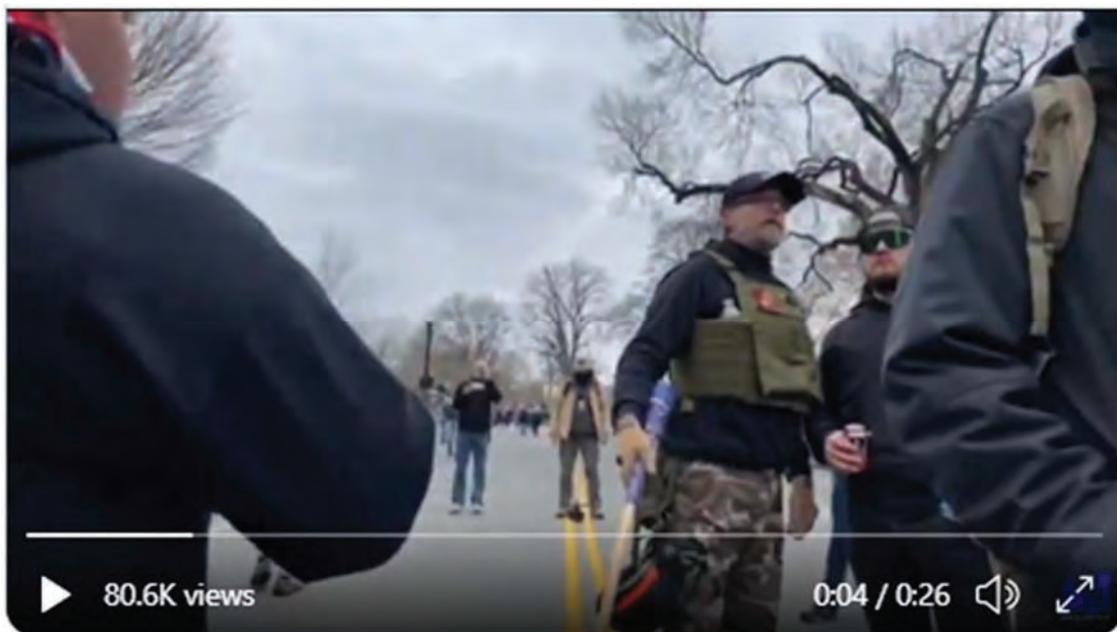
22. On January 6, 2021, a large group of Proud Boys were captured on publicly-available video marching in a group on Constitution Avenue, Northwest, in the area around First Street, Northwest. The group march was led by, among others, Proud Boys organizers Joseph Biggs and Ethan Nordean, who have both been charged by complaint.<sup>3</sup> The group was engaged in

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<sup>3</sup> On January 19, 2021, Joseph Biggs was charged by criminal complaint for violations of 18 U.S.C. §§ 1512(c), 1752(a), and 40 U.S.C. §§ 5104(e)(2)(D) and (F). *United States v. Joseph Biggs*, 21-mj-126. On February 2, 2021, Ethan Nordean was charged by criminal complaint for violations of 18 U.S.C. §§ 1361, 2 and 18 U.S.C. § 1512(c)(2), among other charges, in connection with his actions at the U.S. Capitol on January 6, 2021. *United States v. Ethan Nordean*, 21-mj-195.

various chants and response calls, including “F\*\*\* Antifa!” and “Whose streets? Our streets!” CHRESTMAN and FELICIA KONOLD were observed within this group.

23. Your affiant reviewed open source media that depicted CHRESTMAN interacting with several members of the Proud Boys near the Capitol before it was breached. The image below depicts CHRESTMAN (left) communicating with a person that your affiant identified as Proud Boy Ethan Nordean (right).



24. The same group of Proud Boys were later captured on publicly-available video moving toward the pedestrian entrance to the Capitol grounds on First Street, Northwest. The group continued to be led by Proud Boy organizers Joseph Biggs and Ethan Nordean. As depicted in the images below, marching among this group were the SUBJECTS. Walking within feet of the SUBJECTS are other identified Proud Boys, such as William Pepe, who has been indicted for his conduct on January 6, 2021.<sup>4</sup>

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<sup>4</sup> William Pepe was charged by indictment on January 29, 2021, in a Conspiracy with another identified Proud Boy, Dominic Pezzola in 21-cr-52, with violations of 18 U.S.C. §§ 231, 1512(c),



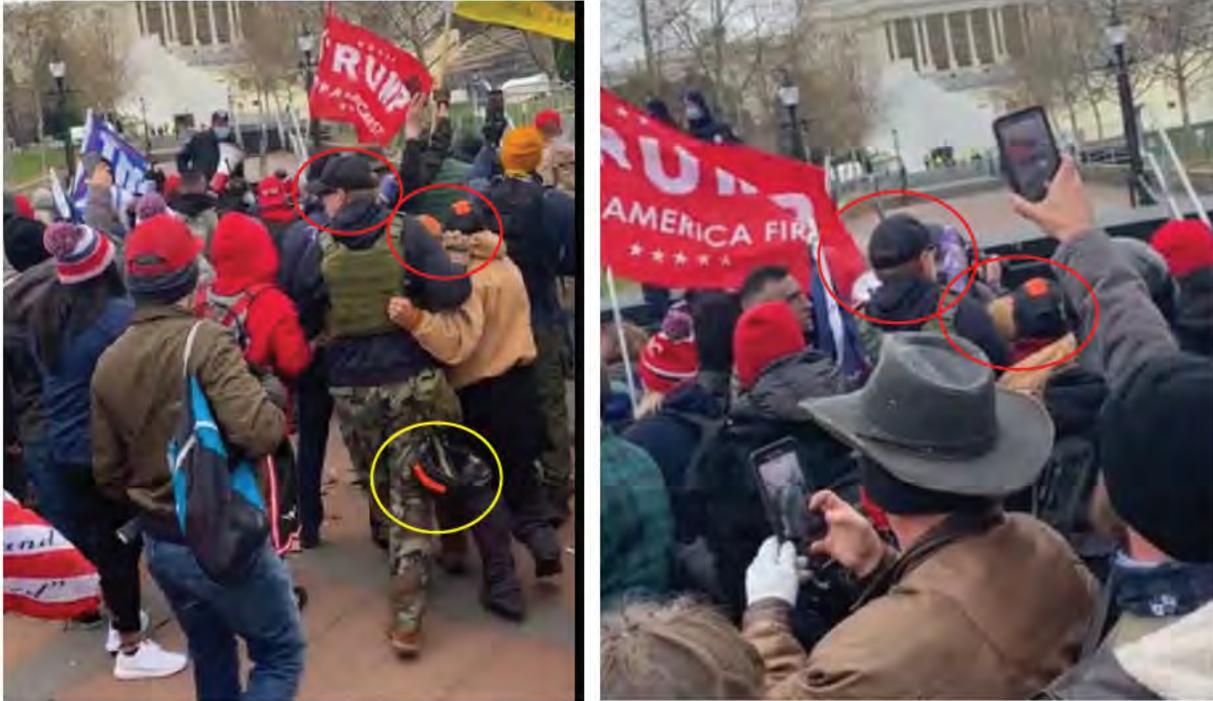
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among other charges, in connection with his actions at and inside the U.S. Capitol on or about January 6, 2021.

*The SUBJECTS' Conduct at the Capitol on January 6, 2021*

25. Your affiant has studied video footage and still photographs of the January 6, 2021 incursion of the U.S. Capitol. Based on your affiant's review of such materials, your affiant asserts that the SUBJECTS engaged in the conduct described herein.

26. Shortly before 1:00 p.m., a large crowd, including a large group of Proud Boys, gathered near the pedestrian entrance to the Capitol grounds on First Street. The entrance was secured by a small number of U.S. Capitol Police, who stood behind a waist-high metal barrier. Shortly thereafter, two men advanced toward the waist-high metal gate. The crowd followed. Individuals that I recognize as CHRESTMAN, FELICIA KONOLD, and CORY KONOLD moved to the front of the crowd during the initial confrontation with law enforcement. Your affiant notes that CHRESTMAN appeared to have a black helmet with a piece of orange tape hanging from his backpack (circled in yellow below). This orange tape is similar in kind and character to the orange tape affixed to the headwear of FELICIA KONOLD, CORY KONOLD, KUEHNE, and COLON.



27. Within minutes, the crowd overwhelmed the U.S. Capitol Police officers seen at the top of the steps in the image above. The metal barricades were toppled, and the crowd advanced toward the Capitol. Within minutes, CHRESTMAN, FELICIA KONOLD, and CORY KONOLD had moved past the barrier and placed themselves at or near the front of the crowd at the next police barrier.

28. As Capitol Police began to form another line closer to the Capitol, CHRESTMAN, FELICIA KONOLD, and CORY KONOLD were among those at the front of the crowd. CHRESTMAN then stood directly in front of Capitol Police officers who were attempting to guard the Capitol. CHRESTMAN yelled at the Capitol Police officers, “You shoot and I’ll take your fucking ass out!” At a different point, Capitol Police officers attempted to arrest one person from the crowd, and CHRESTMAN encouraged other members of the crowd to stop the Capitol Police from arresting him. Among other things, CHRESTMAN said to other members of the crowd, “Don’t let them take him!” Immediately next to CHRESTMAN was FELICIA KONOLD, who at

multiple points deliberately grabbed CHRESTMAN's elbow and tactical vest. During this sequence, FELICIA KONOLD yelled at Capitol Police, "Let him go!" A screenshot of CHRESTMAN, FELICIA KONOLD, and CORY KONOLD during this sequence can be seen below. Of note, CHRESTMAN's wooden club or axe handle can be seen wrapped in a blue flag.



29. The next police line was soon overwhelmed and outflanked by crowds of people as they crowd advanced to the front plaza of the U.S. Capitol. CHRESTMAN, FELICIA KONOLD, and CORY KONOLD again moved to the front of the crowd and stood directly in front of law enforcement officers who were attempting to guard the Capitol. CHRESTMAN put on the black helmet with orange tape, and he can be seen holding what appears to be the same wooden club or axe handle discussed above. In the image below, the wooden club or axe handle has been stripped of the flag.



30. Shortly thereafter, CHRESTMAN removed the black helmet and donned what appears to be a respirator. The helmet with orange tape that had been worn by CHRESTMAN was then worn briefly by CORY KONOLD. As is depicted below, FELICIA KONOLD helped CORY KONOLD put on the helmet.



31. Video footage taken during the event also captures CHRESTMAN addressing the crowd of people who had unlawfully assembled on the Capitol grounds. At one point, CHRESTMAN turned to face the crowd and shouted: “Whose house is this?” The crowd responded, “Our house!” CHRESTMAN shouted, “Do you want your house back?” The crowd responded, “Yes!” CHRESTMAN shouted back, “Take it!”

32. At another point while outside the Capitol, and as seen in the image below, CHRESTMAN, FELICIA KONOLD, CORY KONOLD and others used their hands and bodies in an effort to disrupt or dismantle the metal barriers that officers were using to control the crowd.



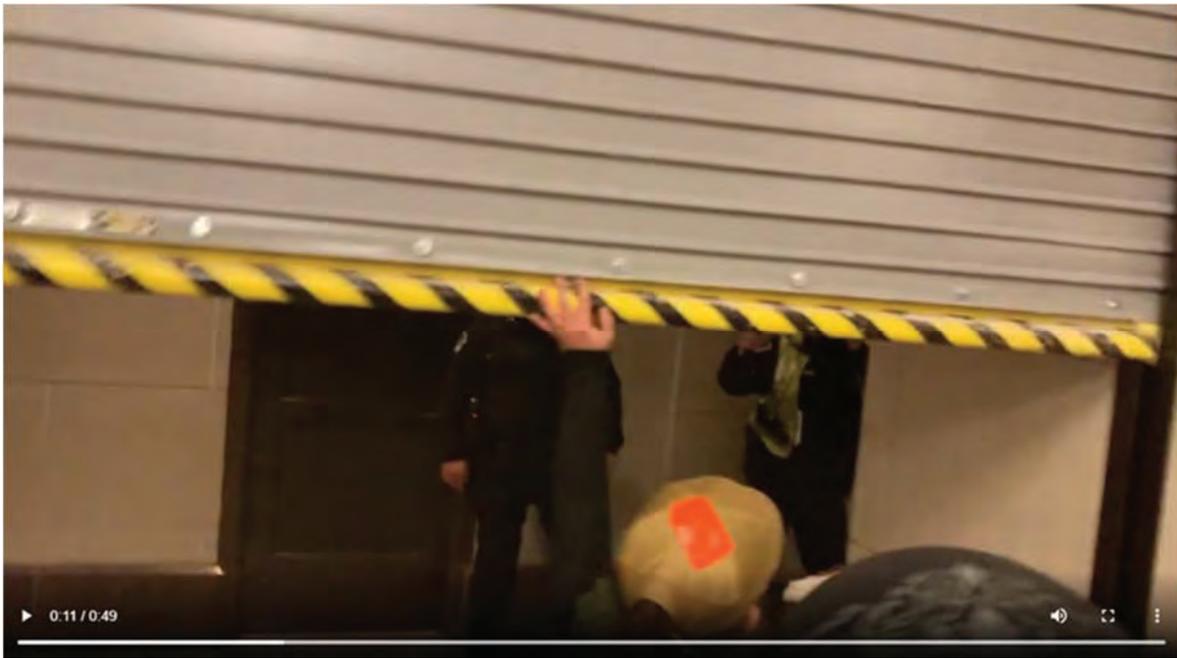
*The SUBJECTS' Conduct Inside the Capitol on January 6, 2021*

33. The SUBJECTS subsequently entered the U.S. Capitol and appeared together at various locations inside the building.

34. For example, footage obtained from surveillance cameras inside the Capitol, along with open source video, depicts efforts by law enforcement officers to lower metal barriers in the tunnels underneath the Capitol. These metal barriers are designed to seal off areas of the Capitol and were deployed in an effort to control the crowd. U.S. Capitol Police officers were positioned on the other side of the metal barriers, which were being lowered to prevent the crowd from advancing. FELICIA KONOLD, CHRESTMAN, KUEHNE, and COLON each took deliberate steps to prevent the barriers from closing. In my training and experience, the actions of FELICIA KONOLD, CHRESTMAN, KUEHNE, and COLON were intended to and did serve to prevent law enforcement from securing areas of the Capitol against unlawful entrants.

35. The person that I have identified as FELICIA KONOLD can be seen intentionally obstructing the operations of the metal barriers by attempting to stop them from closing by placing her arm in the path of the barriers. As FELICIA KONOLD took this action, a person that I

recognize as CORY KONOLD stood immediately behind her. Law enforcement officers can be seen standing on the other side of the barrier.



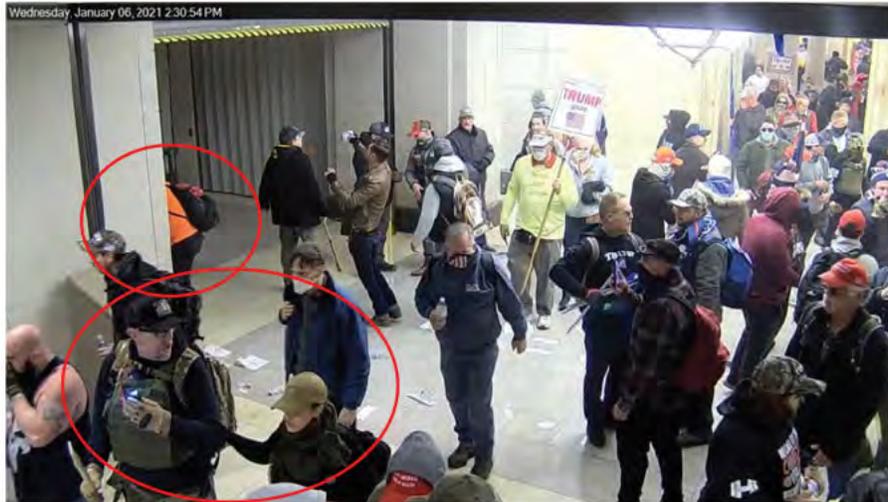
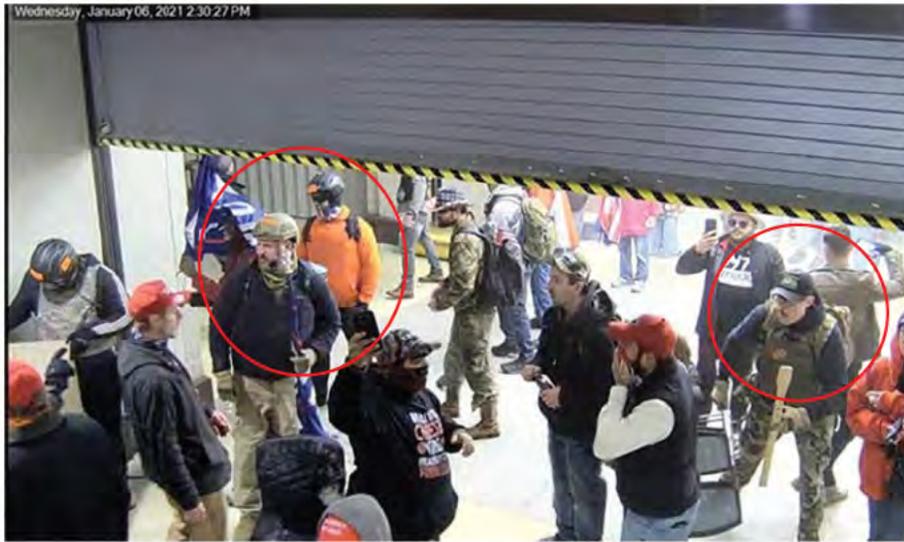
36. At around the same time and in the same general location in the Capitol, CHRESTMAN took a similar action to obstruct the metal barriers with a wooden club or axe handle.



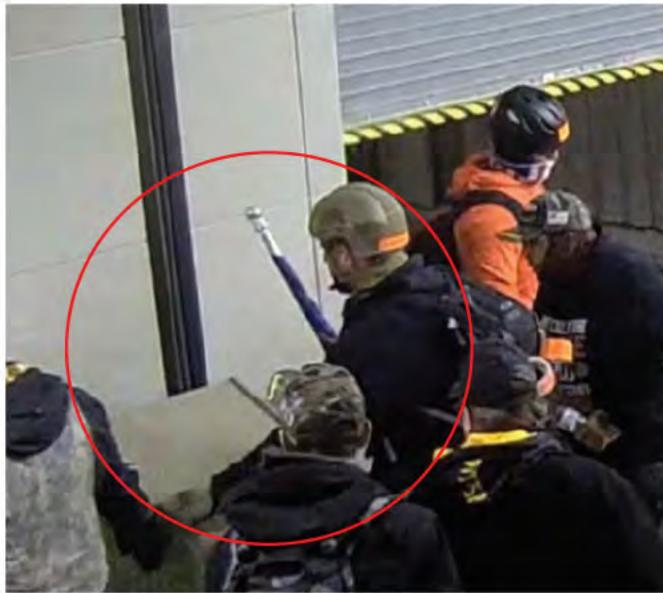
37. As shown below, CHRESTMAN, KUEHNE, and COLON can be seen standing near one another, and the surveillance video appears to show them gesturing and calling out to one another as law enforcement officers attempted to lower the barriers. As can be seen in the second image below, FELICIA KONOLD was initially out of view but then rejoined CHRESTMAN.<sup>5</sup>

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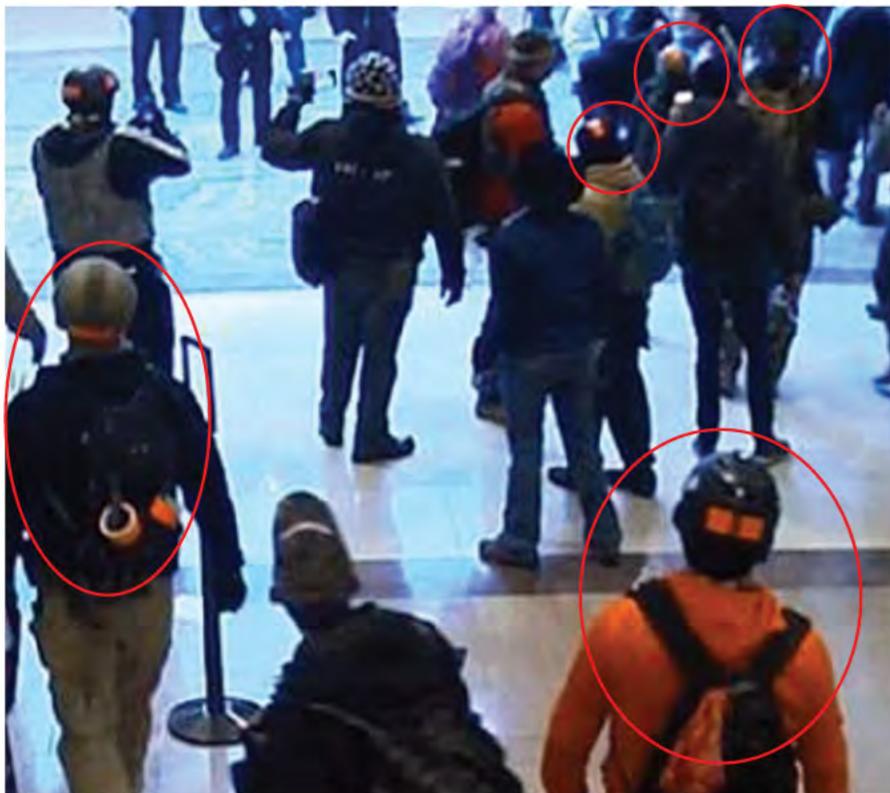
<sup>5</sup> Proud Boys Nicholas Ochs and Nicholas DeCarlo can be seen in the background recording the unlawful conduct with their phones and other devices. Ochs and DeCarlo were indicted on February 3, 2021 in 21-cr-73, for a Conspiracy to commit violations of 18 U.S.C. § 1512(c), among other charges, in connection with their actions at and inside the U.S. Capitol on or about January 6, 2021.

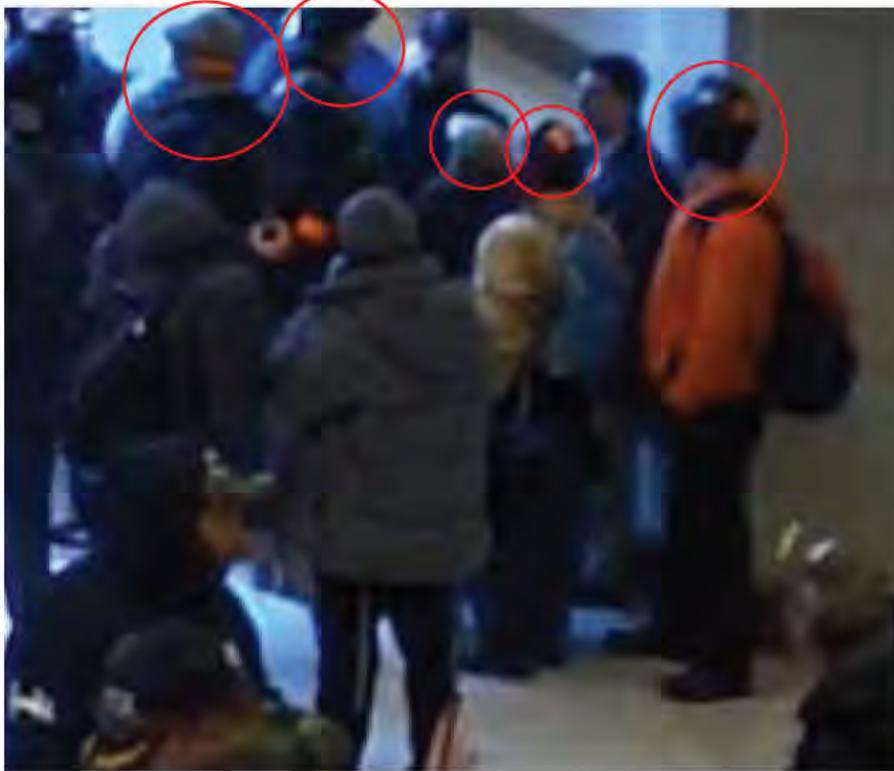


38. Images of KUEHNE motioning to COLON were captured in the same surveillance camera. KUEHNE grabbed what appears to be a podium and placed the podium strategically in the track of one of the barriers, which action would likely prevent the barrier from closing. Shortly after KUEHNE obstructed the path of one door with the podium, COLON grabbed a chair and placed it in the path of a separate barrier.



39. In a different surveillance video from a different part of the Capitol, the SUBJECTS can again be seen in close proximity to one another while interacting with several other persons who unlawfully entered the Capitol.





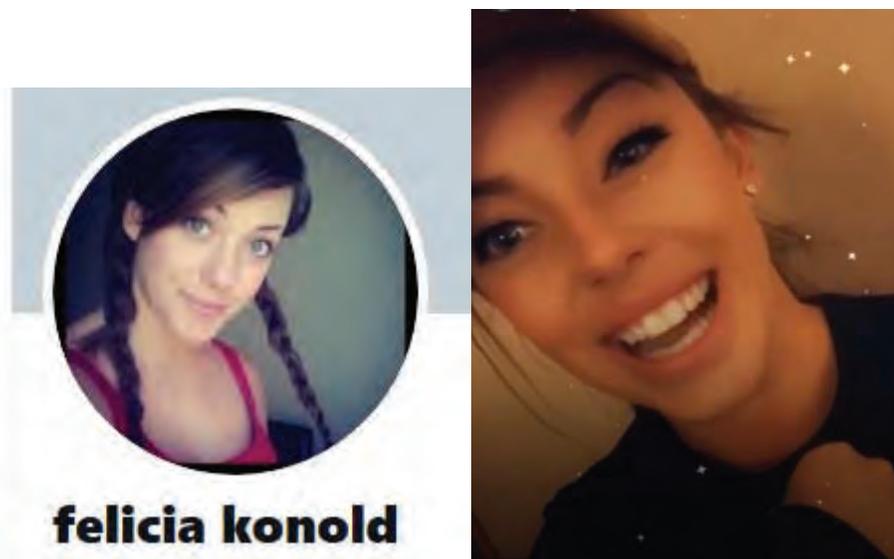
40. Your affiant also notes that many within the crowd with the SUBJECTS were wearing orange clothing or orange tape on their hats or helmets. As described in Paragraph 15, KUEHNE was carrying two rolls of orange tape on his backpack. Your affiant submits that the gauge of the KUEHNE's orange tape is consistent with the orange tape worn on the hats or helmets of the SUBJECTS as well as others in the crowd. Based on my training and experience, your affiant believes the use of orange tape by multiple members in the crowd was a mark that was intended to identify persons for a particular purpose. The intent and purpose of this identifying tape remains under investigation.

*Statements in Social Media By FELICIA KONOLD*

41. Following this incident, law enforcement agencies received numerous tips from the public. One such tip was provided by Witness-1 ("W-1"); W-1 provided a tip regarding a particular Snapchat account for username "classy\_lacy" (hereinafter the "SNAPCHAT ACCOUNT"). The

SNAPCHAT ACCOUNT posted videos on Snapchat bragging about the attack on the U.S. Capitol on January 6, 2021. W-1 provided a compilation of three videos from the SNAPCHAT ACCOUNT to the FBI.

42. Open source searches for the particular username associated with the SNAPCHAT ACCOUNT identified a Twitter account with the same username (both usernames referred to “classy\_lacy”) (hereinafter the “TWITTER ACCOUNT”). The display name for this TWITTER ACCOUNT was “felicia konold,” and the publicly available profile photograph associated with the TWITTER ACCOUNT appeared to be same person whose profile photograph appeared in the SNAPCHAT ACCOUNT. The profile pictures from the SNAPCHAT ACCOUNT (on the right) and the TWITTER ACCOUNT (on the left) are set forth below.



43. One video from the SNAPCHAT ACCOUNT featured a woman talking toward the camera in a “selfie” style. The woman said, in substance and in part:

The one thing I learned today...  
*[Barks, Barks]*  
*[Laughs]*  
I’m watching the news guys  
Fuuuck  
Dude, I can’t even put into words. I. I. Never.  
I never could *[unintelligible]* have imagined having that  
much of an influence on the events that unfolded today.

*[Laughs]*

Dude, people were willing to follow. You fucking lead, and everyone had my back, dude, everyone, fucking wall, legit, in the air, up against the fence, *[unintelligible]*, three lines of police, fence, me, not even on the ground, my feet weren't even on the ground, all my boys, behind me, holding me up in the air, pushing back.

*[Laughs]*

We fucking did it.

The following is an image of the woman speaking in the video.



44. Additionally, in a video from the SNAPCHAT ACCOUNT, a woman's voice celebrated that she had just been "recruited into a fucking chapter from Kansas City." In the post, the woman claimed that she had been told that even though she was not from Kansas City, she was "with them now." During the video post, the speaker displayed a two-sided "challenge coin" that appears to have markings that designate it as belonging to the Kansas City Proud Boys.



### **CONCLUSIONS OF AFFIANT**

45. Based on the foregoing, your Affiant submits that there is probable cause to believe that William CHRESTMAN, Christopher KUEHNE, Louis Enrique COLON, FELICIA KONOLD, and CORY KONOLD each did violate 18 U.S.C. § 371 by conspiring together, and with others known and unknown, (i) to corruptly obstruct, influence, or impede an official proceeding before Congress, that is, the certification of the Electoral College, and (ii) to obstruct, impede, or interfere with a law enforcement officer during the commission of a civil disorder.

46. Based on the foregoing, your Affiant further submits that that there is probable cause to believe that William CHRESTMAN, Christopher KUEHNE, Louis Enrique COLON, FELICIA KONOLD, and CORY KONOLD each did violate 18 U.S.C. §§ 231(a)(3), 1512(c)(2), 1752(a)(1) and (2), and 40 U.S.C. §§ 5104(e)(2)(D) and (G).

47. Based on the foregoing, your Affiant further submits that that there is probable cause to believe that William CHRESTMAN did violate 18 U.S.C. § 115(a)(1)(B) by threatening to assault a Federal law enforcement officer, and 18 U.S.C. §§ 1752(a)(1) – (2), 1752(b)(1)(A) for the use and carrying of a dangerous weapon during the commission of the offense.

Respectfully submitted,



Special Agent  
Federal Bureau of Investigation

Subscribed and sworn by telephone pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on  
February 10, 2021.

A handwritten signature in blue ink, appearing to read 'Z. Faruqi'.



2021.02.10  
15:33:03 -05'00'

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HON. ZIA M. FARUQUI  
UNITED STATES MAGISTRATE JUDGE