

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
Traci J. Sunstrum
DOB: [Redacted]
Case No.
Defendant(s)

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:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 1752(a)(1), 18 U.S.C. § 1752(a)(2), 40 U.S.C. § 5104(e)(2)(D), and 40 U.S.C. § 5104(e)(2)(G).

This criminal complaint is based on these facts:
See attached statement of facts.

[X] Continued on the attached sheet.

[Redacted signature area]

Complainant's signature

[Redacted name] 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: 04/13/2021

[Handwritten signature]

Judge's signature

City and state: Washington, D.C.

Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

STATEMENT OF FACTS

1. Your affiant, [REDACTED] is a Supervisory Customs and Border Protection Officer with U.S. Customs and Border Protection and a Task Force Officer with the Federal Bureau of Investigation (FBI) assigned to the Joint Terrorism Task Force in the Buffalo Field Office. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a Task Force Officer, 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.

2. 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.

Incursion at the U.S. Capitol on January 6, 2021

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

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

5. At 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 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.

6. 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.

7. 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.

Facts Specific to TRACI SUNSTRUM

8. Following the January 6, 2021 attack on the Capitol, your affiant received and reviewed multiple tips submitted by members of the public. On January 12, 2021, law enforcement received an anonymous tip that TRACI SUNSTRUM was observed on a Facebook Live stream from inside the U.S. Capitol building.

9. According to records obtained through a search warrant, which was served on Google, a mobile device associated with the Google account tjgreenfrog@gmail.com was present at the U.S. Capitol on January 6, 2021. Google estimates device location using sources, including GPS data and information about nearby Wi-Fi access points and Bluetooth beacons. This location data varies in its accuracy, depending on the source(s) of the data. As a result, Google assigns a “maps display radius” for each location data point. Thus, where Google estimates that its location data is accurate to within 10 meters, Google assigns a “maps display radius” of 10 meters to the location data point. Finally, Google reports that its “maps display radius” reflects the actual location of the covered device approximately 68% of the time. In this case, Google location data shows that a device associated with the Google account tjgreenfrog@gmail.com was within the U.S. Capitol on January 6, 2021 between the hours of 2:26 p.m. through 2:48 p.m. EST. Google records showing the “maps display radius” for this location data, which encompasses a latitude and longitude that are entirely within the U.S. Capitol Building, can be found in Table 1 below:

Device_ID	Latitude	Longitude	Source	Maps Display Radius (m)	DateTime (ET)	Name	Recovery SMS	Email
1713209033	38.8898196	-77.0090007	WIFI	45	1/6/2021 14:26	Traci Sunstrum	17162638181	tjgreenfrog@gmail.com
1713209033	38.8898219	-77.0090256	WIFI	39	1/6/2021 14:28	Traci Sunstrum	17162638181	tjgreenfrog@gmail.com
1713209033	38.8898165	-77.0089608	WIFI	82	1/6/2021 14:30	Traci Sunstrum	17162638181	tjgreenfrog@gmail.com
1713209033	38.8892143	-77.0089535	WIFI	68	1/6/2021 14:34	Traci Sunstrum	17162638181	tjgreenfrog@gmail.com
1713209033	38.8892047	-77.0089617	WIFI	122	1/6/2021 14:36	Traci Sunstrum	17162638181	tjgreenfrog@gmail.com
1713209033	38.8890949	-77.0090385	WIFI	128	1/6/2021 14:40	Traci Sunstrum	17162638181	tjgreenfrog@gmail.com
1713209033	38.889229	-77.008941	WIFI	28	1/6/2021 14:42	Traci Sunstrum	17162638181	tjgreenfrog@gmail.com
1713209033	38.8889295	-77.0088191	WIFI	36	1/6/2021 14:44	Traci Sunstrum	17162638181	tjgreenfrog@gmail.com
1713209033	38.8889347	-77.0087743	WIFI	34	1/6/2021 14:48	Traci Sunstrum	17162638181	tjgreenfrog@gmail.com

Table 1

10. On February 4, 2021, legal process was served to Google LLC to obtain subscriber information for Google Account ID: 1015952893652 and email tjgreenfrog@gmail.com. On February 4, 2021, returns from Google LLC indicated that the Google Account ID: 1015952893652 and email account tjgreenfrog@gmail.com were created on December 24, 2010 and subscribed to by TRACI SUNSTRUM. The returns also listed a backup email address of tjgreenfrog@hotmail.com and a backup SMS text messaging phone number of +17162638181.

11. Upon receiving this information, FBI compared a known image of SUNSTRUM obtained from the New York State Department of Motor Vehicles on January 27, 2021 to images and surveillance footage obtained by law enforcement at and around the U.S. Capitol on January 6, 2021. By comparing this photograph to the surveillance footage, your affiant reasonably believes that the person is TRACI SUNSTRUM.

12. Your affiant reviewed surveillance footage of an individual resembling SUNSTRUM inside the U.S. Capitol in the interior area of the Upper House Door at 2:45 p.m. EST. This time is consistent with the time when, according to the Google search warrant, the user of the Google account tjgreenfrog@gmail.com was within the U.S. Capitol. The Upper House Door accesses the second floor of the Capitol from the east side of the building. I believe SUNSTRUM to be the individual seen in Photo 1 wearing a green jacket and stars-and-stripes pants.



Photo 1

13. Your affiant also reviewed surveillance footage of an individual entering the Capitol in the area of the Senate Wing Door, at approximately 2:16 p.m. EST, who resembles SUNSTRUM. (Photo 2).



Photo 2

14. An individual wearing the same green jacket and stars-and-stripes pants was observed on surveillance footage in Statuary Hall at approximately 2:33 p.m. EST (Photos 3 and 4); in the area of the East Stairs near H208 at approximately 2:44 p.m. EST (photo 5); and in the area of the Main Hall Door near H208 at approximately 2:44 p.m. EST (Photo 6).



Photo 3



Photo 4



Photo 5



Photo 6

15. Finally, your affiant reviewed a photo of a person whom I believe to be SUNSTRUM, which was posted on The National Law Journal (www.law.com) under the heading “Inciting a Riot: Legal Community Erupts in Calls for Trump’s Removal as Mob Storms Capitol.” I believe this photo (Photo 7), which was taken inside the U.S. Capitol on January 6, 2021, shows SUNSTRUM inside the U.S. Capitol:



Photo 7

Statement of Probable Cause

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

17. Your affiant submits there is also probable cause to believe that TRACI SUNTRUM violated 40 U.S.C. § 5104(e)(2)(D) & (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.



Task Force Officer
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 13th day of April 2021.

A handwritten signature in cursive script that reads "Rob M Meriwaether".

ROBIN M. MERIWAETHER,
U.S. MAGISTRATE JUDGE