

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
Brittiany Angelina Dillon
DOB: XXXXXX

)
) Case: 1:21-mj-00401
) Assigned To : Meriweather, Robin M.
) Assign. Date : 4/26/2021
) Description: COMPLAINT W/ ARREST WARRANT
)

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:

Code Section

Offense Description

- 18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority,
18 U.S.C. § 1752(a)(2) - Disorderly and Disruptive Conduct in a Restricted Building or Grounds,
40 U.S.C. § 5104(e)(2) - Violent Entry and Disorderly Conduct on Capitol Grounds.

This criminal complaint is based on these facts:

See attached statement of facts.

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: 04/26/2021

[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

I, [REDACTED] am a Special Agent with the Federal Bureau of Investigation. I am assigned to the Joint Terrorism Task Force in the FBI Baltimore Division, where my duties include investigating domestic terrorism matters. 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, detention, 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.

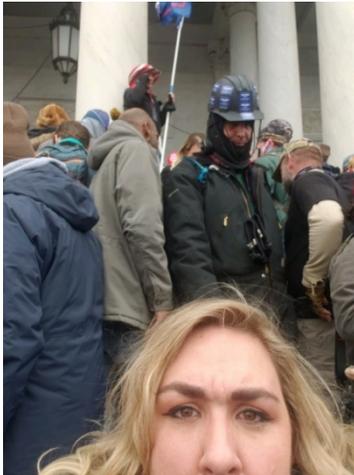
At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, shortly around 2:00 p.m., individuals 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.

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.

During the analysis of a cell phone seized pursuant to a search warrant on January 20, 2021, an SMS conversation was identified between Bryan Betancur, who was arrested in connection with the Capitol riot on January 17, 2021, and (410) 218-8727, identified in Betancur's phone as "Britney" and later identified as Brittiany Angelina Dillon (DILLON). This conversation included discussion of election fraud and plans to attend the rally in the days prior to January 6th. The pair, both present at the Capitol rally, exchanged messages on January 6, 2021 which included the below photograph and message excerpts sent by DILLON.



Messages Sent by DILLON on 1/6/2021

"The DC Police have reached a new low...they shot someone near me. Please come home intact"

"I was there. I got pepper sprayed at the door of the capital and tear gassed 3 times making my way up to it"

"I fought hard...I fell in the door and they tried to beat me with batons so I backed off and they pepper sprayed my eyes"

Initial database checks conducted on or about January 22, 2021 revealed that (410) 218-8727 was associated with DILLON, who lived at 1924 Kelmore Rd, Baltimore, MD 21222.

On or about January 23, 2021, a review of FBI media holdings from the Capitol riot on January 6, 2021 revealed multiple videos in which DILLON is believed to appear. The videos show DILLON at various locations outside the U.S. Capitol wearing gray athletic style shoes, black leggings, a black turtleneck, black insulated jacket with hood, and a light-colored fanny pack worn in the front.



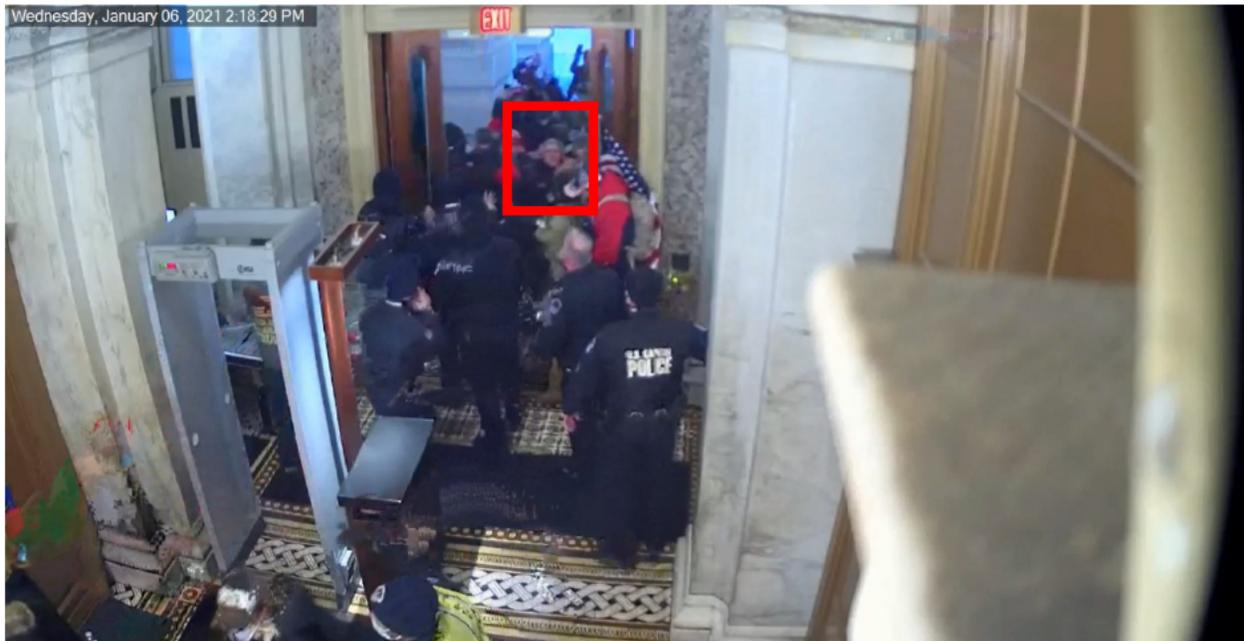
DILLON Outside the Capitol Building



Two Additional Photos of Dillon Outside the Capitol Building

Investigating agents reviewed U.S. Capitol security footage. One identified video depicts DILLON at the Senate Carriage Door entrance to the Capitol at approximately 2:18pm (Video 1).

Video 1 shows Dillon pushing through the crowd attempting to enter the building. At one point, she fell over the threshold of the Senate Carriage Door into the building, which is consistent with her SMS conversation describing the events (“I fought hard...I fell in the door and they tried to beat me with batons so I backed off and they pepper sprayed my eyes”). She pushed forward against law enforcement officers and, eventually, was repelled by what appeared to be a riot control officer with a baton. Dillon appeared in the doorframe approximately eighteen seconds into Video 1.



Senate Carriage Door Security Footage



Senate Carriage Door Security Footage Close Up

On January 5, 2021, within the SMS conversation discussed above, DILLON told Betancur that she would be leaving for D.C. in her vehicle the following day at 05:00 a.m. On the evening of January 6, 2021 at approximately 7:30 p.m., she explained that she had returned to Dundalk, Maryland, which is an inner-ring suburb of Baltimore, Maryland.

Investigating agents conducting physical surveillance of DILLON's residence observed two vehicles bearing Texas plates parked outside the residence, both of which were registered to George Dillon. George Dillon was listed as an emergency contact on DILLON's Texas driver's license and is believed to be DILLON's husband. Maryland license plate reader information revealed that one of the vehicles, TX KRB3121, was captured on January 6, 2021, traveling Southbound on I-695 towards D.C. at 6:03 a.m. and returning Northbound at the same spot at 6:07 p.m. DILLON is believed to be the primary driver of TX KRB3121.

According to records obtained through a search warrant which was served on Verizon, on January 6, 2021, in and around the time of the incident, the cellphone associated with (410) 218-8727 was identified as having utilized a cell site consistent with providing service to a geographic area that included the interior of the United States Capitol building.

According to records obtained through a search warrant which was served on Google, a mobile device associated with (410) 218-8727 and brittianyadillon@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 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 this mobile device within the U.S. Capitol restricted area at multiple times and locations. Google location data captured at 2:21 p.m. shows the device at the Northern edge of the Capitol building in the immediate vicinity of the Senate Carriage Door. The security footage displayed in Video 1, recorded at approximately 2:18 p.m., was captured from the interior of the Senate Carriage Door. Google records show that the "maps display radius" for this location data was less than or equal to 100 feet, which encompasses an area that is partially within the U.S. Capitol Building.

According to business records provided by Verizon, the subscriber to the (410) 218-8727 is George Dillon of Dundalk, Maryland. According to business records provided by Google, the subscriber to the account associated with brittianyadillon@gmail.com was "B Di" with a recovery phone number of (410) 218-8727.

On April 21, 2021, I interviewed DILLON's father about Betancur. During that interview, I showed DILLON's father the photograph that DILLON sent to Betancur on January 6, 2021. DILLON's father positively identified DILLON in that photograph.

Based on the foregoing, I submit that there is probable cause to believe that DILLON 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 attempt or conspire 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.

I submit there is also probable cause to believe that DILLON violated 40 U.S.C. § 5104(e)(2)(D), 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.



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 26th day of April, 2021.

A handwritten signature in cursive script, appearing to read "Rob M Meriweather".

ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE