

STATEMENT OF FACTS

Your affiant, Christian Gabriel Coulter, is a Special Agent assigned to the Federal Bureau of Investigation (FBI). In my duties as a special agent, I have conducted multiple criminal and counterterrorism investigations. 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.

Background

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.

Conduct of Hand and Robinson-Hand

According to records obtained from Google, mobile devices associated with telephone numbers (xxx) xxx-5649 (x5649) and (xxx) xxx-2361 (x2361)¹ were identified as being within or around the U.S. Capitol between 2:00 p.m. and 6:30 p.m. EST pm January 6, 2021. The mobile device associated with x5649 was associated with Google account hand.chuck.3@gmail.com, display name Chuck Hand, and the mobile device associated with x2361 was associated with Google account mrobinson653@gmail.com, display name Mandy Michelle Robinson. Your affiant has since learned from a law enforcement liaison that Charles Hand, III (“Hand”) and Mandy Robinson-Lanning, now Robinson-Hand, (“Robinson-Hand”), are a married couple.

After further investigation, individuals believed to be Hand and Robinson-Hand were identified in open source documentary footage and in U.S. Capitol closed circuit surveillance cameras (CCTV), which revealed that Hand and Robinson-Hand were present on the Capitol grounds and inside the U.S. Capitol building on January 6, 2021. One independent witness who knows Hand and Robinson-Hand from personal interactions with them in their home state of Georgia positively identified them in the following screenshots taken from CCTV of the inside of the U.S. Capitol Building on January 6, 2021:

¹ The complete phone numbers are known to the affiant but are omitted here due to the public nature of this document.

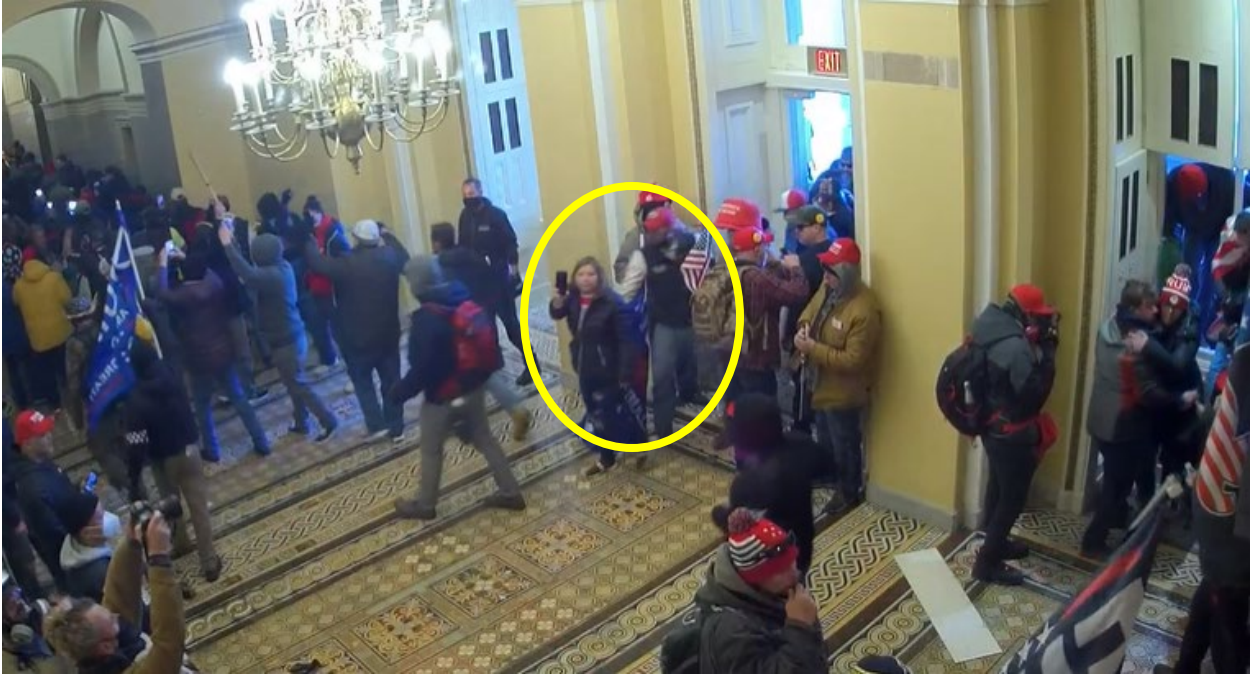


Based on this identification, as well as a comparison of the CCTV and open source videos with Hand and Robinson-Hand's driver's license photos, and a comparison of their clothing and accessories worn throughout the day, Hand and Robinson-Hand are believed to be the individuals captured in the screenshots below. Throughout the videos, Hand is seen with a short brown beard and mustache and is wearing a white collared shirt, a dark vest, blue jeans, brown shoes and a red University of Georgia baseball cap emblazoned with a black 'G' atop a white oval. Robinson-Hand is seen with brown hair past her shoulders and is wearing a red shirt, black hooded jacket, blue jeans with identifiable rips in front, and dark sneakers.

On January 6, 2021, Goldcrest Films International Ltd captured footage of a mob gathering outside of the north west side of the Capitol somewhere near the northwest lawn and terrace. This footage was provided to the FBI, and Hand and Robinson-Hand were identified in this crowd. Of note, at approximately 1:06 p.m., Hand broke off a piece of metal fencing and placed it into the back pocket of his jeans. This time estimate is based on the time approximation of the Goldcrest Films filmmaker:



CCTV captured people entering the U.S. Capitol building through a breached doorway at the Senate Wing. At approximately 2:26 p.m., Hand and Robinson-Hand were captured entering the U.S. Capitol through the Senate Wing Door, while Robinson-Hand held a cell phone in her right hand:



CCTV and an open source video also captured Hand and Robinson-Hand traveling south inside the Capitol into the Crypt then east down a flight of stairs into the Capitol Visitors Center (CVC):





After walking around the entrance to the CVC, Hand and Robinson-Hand eventually made their way toward Emancipation Hall where visual was lost for about six minutes. At about 2:39 p.m., they reappeared on CCTV and were fully and partially observed making gestures in the direction of law enforcement. At one point, law enforcement was observed in a physical

altercation with unknown persons. Hand appeared to try to advance towards the scuffle as Robinson-Hand restrained him:



At about 2:43 p.m., Hand and Robinson-Hand returned from the CVC and headed back upstairs, using the “up” escalator this time:



According to a tipster, Hand posted the following commentary on his Facebook account about what he witnessed at the Capitol on January 6, 2021. He described himself as “an eye witness of the storming of the United States Capitol on 1-6-2021” and said that he was “on the scene from 1:30pm to 4:00pm.” He further stated that he “saw makeshift fencing that had been torn down,” a crowd of people “rushing the Capitol Police,” for which “tear gas, rubber bullets, mace and etc wasn’t stopping them” and [t]housands upon thousands of angry Americans marching onto the Capitol to protest and stop the certification of what I personally believe to be an election stolen from the American people”:



Chuck Hand is with Mandy Robinson Hand.

17 hrs · 🌐

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This is the story of an eye witness of the storming of the United States Capitol on 1-6-2021 and was on the scene from 1:30pm to 4:00pm.

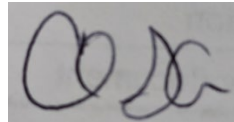
I, along with a very large number of God fearing Americans, attended the rally at the Ellipse, yesterday. Of course, the President was late and didn't come out and speak until an hour after he was supposed to. Around noon, the President spoke (I've heard this same speech from him over the course of the last 2 months) I decided to try and beat the crowd, left like 10 mins before the President was done speaking and headed towards my next destination: the nations Capitol to protest the certification of a Biden/Harris victory in the 2020 presidential election. The series of events that unfolded were strange and chaotic. Here's my account: Along the way, we noticed a large group protesting in front of the Department of Justice. With a few "do your job" chants, I joined to let my voice be heard along with the others. Within a couple minutes, I then got back on track and proceeded towards the Capitol. Upon arriving at the Capitol, I came upon large crowds that were already there. (Keep in mind I left the rally early) At this time, I began to assess the situation. I saw makeshift fencing that had been torn down. Metal guard rails that had been already taken down. The crowd was different here. Coming with me, and some already there, were the "trumpers". But the majority of this crowd that was already there rushing the Capitol Police were wearing all black and in tactical gear wearing gas masks etc but with MAGA hats or Trump flags. These were definitely not "Trump style" militia or anything to that nature. These characters would eventually over power and overthrow the Capitol Police. With the Capitol Police constantly retreating, losing more and more ground. The tear gas, rubber bullets, mace and etc wasn't stopping them. I tell you that to tell you this. Once the Capitol was breached, that's when it got real hairy and the lines of everything became blurred. Keep in mind, you have over a million people there on site marching towards the Capitol as the breach took place. Thousands upon thousands of angry Americans marching onto the Capitol to protest and stop the certification of what I personally believe to be an election stolen from the American people. Ok are you following me? With the doors already open and all security barriers already broken down the American people commenced to do exactly that. Protest and stop the certification of this fraudulent election. The people are upset and are not being represented in said Capitol. If you look at the pictures circulating, you'll see that the Antifa sporting Trump gear were the ones who caused the chaos and who vandalized and attacked the Capitol Police. From a first hand account, I can tell you that the "Trumpers" did not break, vandalize, nor attack any law officers. The emotional "Trump Supporters" were victims to this and are painted to be "Domestic Terrorist". This was a complete setup by, wait for it.... The system itself. Y'all don't find it suspicious that when we fight each other everything is ok but when we stand up against them it's a completely different story.... For example it's perfectly fine and normal nowadays to burn down Auto Zone or run out of Target carrying TVs etc or snatch people out of their cars and beat them up because they have a Trump sticker on their car and destroy other Americans property and it's called a protest. But yesterday, when I witnessed the American people occupy the Capitol, its Domestic Terrorism??? Say what you will because you STILL have the right to do so. For NOW, anyway. I'm just here to tell you to stop believing what Facebook, Twitter, or any other media source tells you. It's time to become free thinkers again.

In addition, a tipster provided Facebook postings made by "Mandy Robinson Hand" stating, "We're in the capital [sic]. Taking our house back," and "We've Been tear gassed etc." The tipster further reported, "This post has since been deleted but Mandy and her husband Chuck were in the Capitol. I cannot tell if they were on any of the images or not."

Criminal Charges

Based on the foregoing, your affiant submits that there is probable cause to believe that Charles Hand, III and Mandy Robinson-Hand 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 Charles Hand, III and Mandy Robinson-Hand 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



Christian Gabriel Coulter
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 4th day of March 2022.

ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE