

## STATEMENT OF FACTS

Your affiant, Kelsey Randall, is a Special Agent with the Federal Bureau of Investigation (FBI). I am assigned to the FBI Joint Terrorism Task Force. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a federal law enforcement officer, I am authorized by law or by a government agency to engage in or supervise the prevention, detention, investigation, or prosecution of violations 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 U.S. Congress convened at the U.S. Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the U.S. House of Representatives and the U.S. Senate were meeting in separate chambers of the U.S. Capitol to certify the vote count of the Electoral College of the 2020 Presidential Elections, 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.

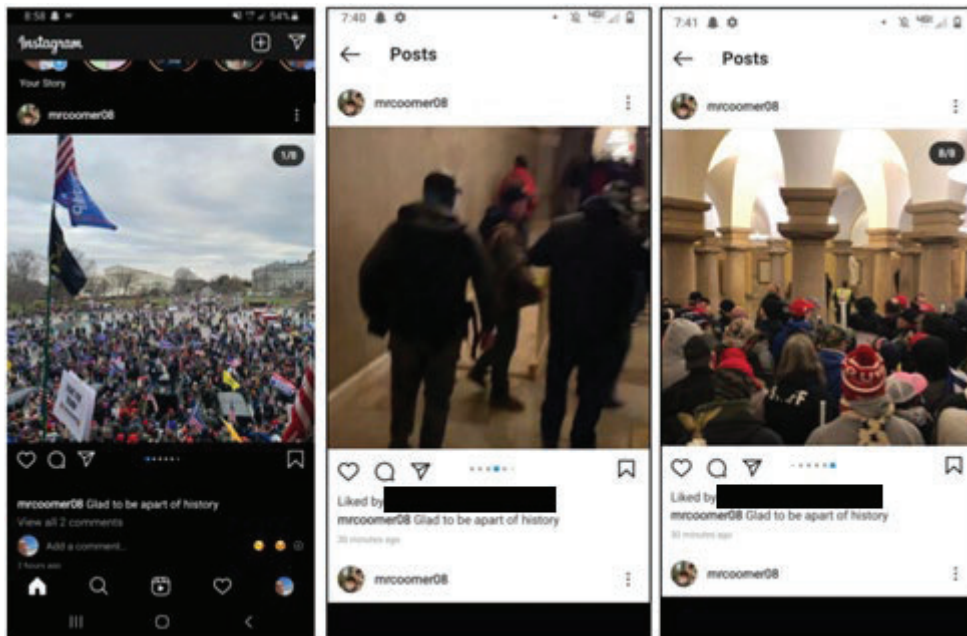
Shortly thereafter, at approximately 2:20 p.m., members of the U.S. House of Representatives and the U.S. Senate, including the President of the Senate, Vice President Mike Pence, were instructed to-and did-evacuate the chambers. Accordingly, the joint session of the U.S. Congress was effectively suspended 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.

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.

1. Initiation of Investigations into COOMER, ABATE, and HELLENEN

Following the events on January 6, 2021, the FBI learned that Micah Coomer (COOMER) posted on Instagram account “mrcoomer08” a collection of photographs with the caption “Glad to be apart [sic] of history”. The angles of the pictures in conjunction with the caption indicate that Instagram user “mrcoomer08” was unlawfully inside the U.S. Capitol building on January 6, 2021.



On August 13, 2021, a federal search warrant was served on Facebook authorizing the search of Instagram account “mrcoomer08”. Facebook records show the subscriber of Instagram account “mrcoomer08” has a name of Micah Coomer and telephone number xxx-xxx-7358 (Phone 7358). Additionally, Department of Defense database check identified COOMER as an active duty United States Marine. In COOMER’s official military personal file, he listed his telephone number as Phone 7358.

Additionally, the data provided by Facebook included direct message conversations between COOMER and other Instagram users. In a conversation that occurred on November 07, 2020 between COOMER and Instagram user 22956548525, COOMER wrote about his beliefs that the election was unfair and fraudulent.

**Author** mrcoomer08 (Instagram: 6732741599)  
**Sent** 2020-11-07 15:13:04 UTC  
**Body** I just love how after years of trying to get trump out of office by any means the left all of a sudden is going to have a "fair" election. They're an absolute joke

**Author** [REDACTED] (Instagram: 22956548525)  
**Sent** 2020-11-07 15:20:19 UTC  
**Body** fr tho!! just like the democratic party

**Author** mrcoomer08 (Instagram: 6732741599)  
**Sent** 2020-11-07 15:32:40 UTC  
**Body** One of my buddies here got a ballot for his cat that died three years ago. It's literally a joke to them

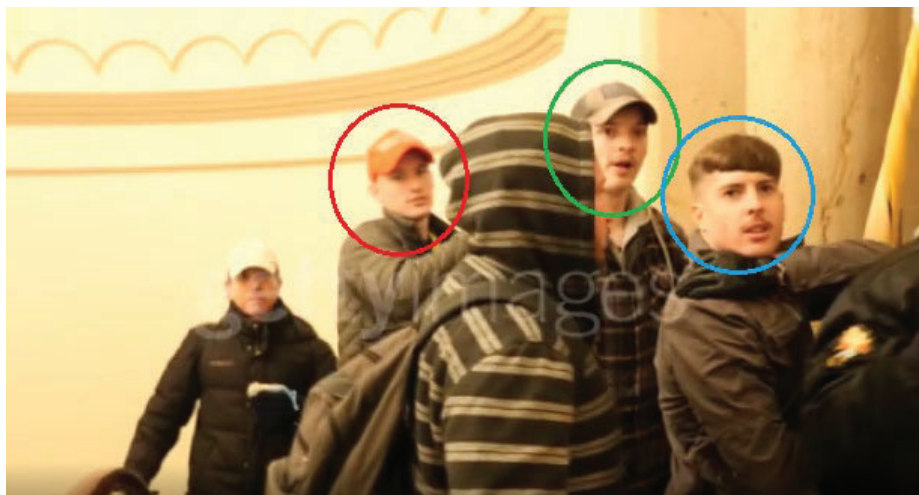
In a different conversation that occurred on January 31, 2021 between COOMER and Instagram user 1790755272, COOMER stated his belief "that everything in this country is corrupt. We honestly need a fresh restart. I'm waiting for the boogaloo". When Instagram user 1790755272 asked, "What's a boogaloo" COOMER responded "Civil war 2".

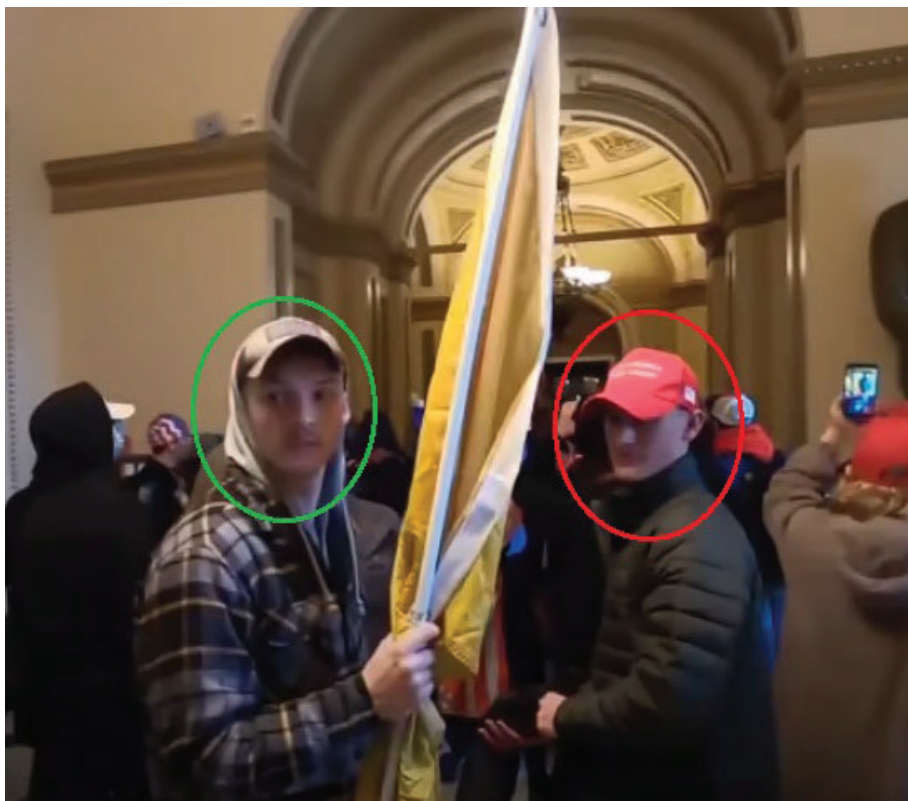
**Author** mrcoomer08 (Instagram: 6732741599)  
**Sent** 2021-01-31 05:22:54 UTC  
**Body** Oh I know. It's just goes to show that everything in this country is corrupt. We honestly need a fresh restart. I'm waiting for the boogaloo

**Author** [REDACTED] (Instagram: 1790755272)  
**Sent** 2021-01-31 05:23:09 UTC  
**Body** I agree but what's a boogaloo

**Author** mrcoomer08 (Instagram: 6732741599)  
**Sent** 2021-01-31 05:23:20 UTC  
**Body** Civil war 2

Using COOMER's Indiana driver's license photograph, law enforcement identified COOMER, identified by the red circle below, inside the U.S. Capitol Building on January 6, 2021. Video footage also identified two male individuals who walked throughout the U.S. Capitol Building with him – Joshua Abate (ABATE), identified by the green circle below, and Dodge Dale Hellonen (HELLONEN), identified by the blue circle below.

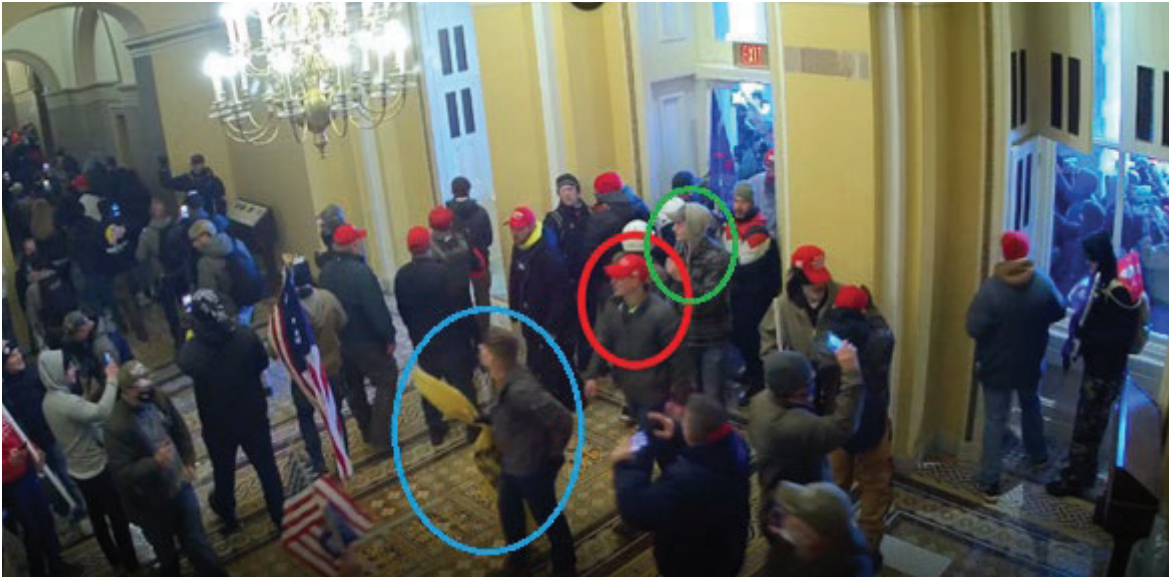




2. Trespass into the U.S. Capitol Building by COOMER, ABATE, and HELLONEN

A review of surveillance camera footage and open-source materials confirm COOMER, ABATE, and HELLONEN unlawfully entered the U.S. Capitol Building on January 6, 2021. COOMER wore a red baseball cap, a black Under Armor sweatshirt with neon outline, and a green puff jacket. ABATE wore a baseball cap with a rectangular design on the front, with a plaid jacket and jeans. HELLONEN wore a dark colored jacket, dark colored pants, and carried a yellow “Don’t Tread on Me” flag.

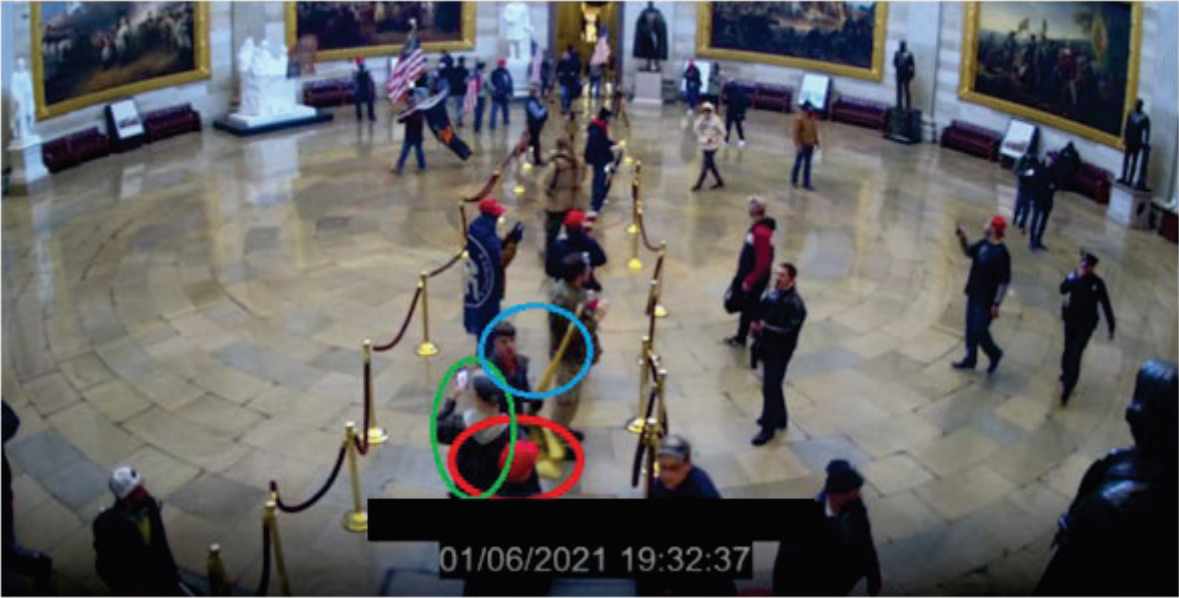
At approximately 2:20 PM EST, COOMER, ABATE, and HELLONEN entered the U.S. Capitol Building through the Senate Wing Door and proceed to walk South down a hallway.



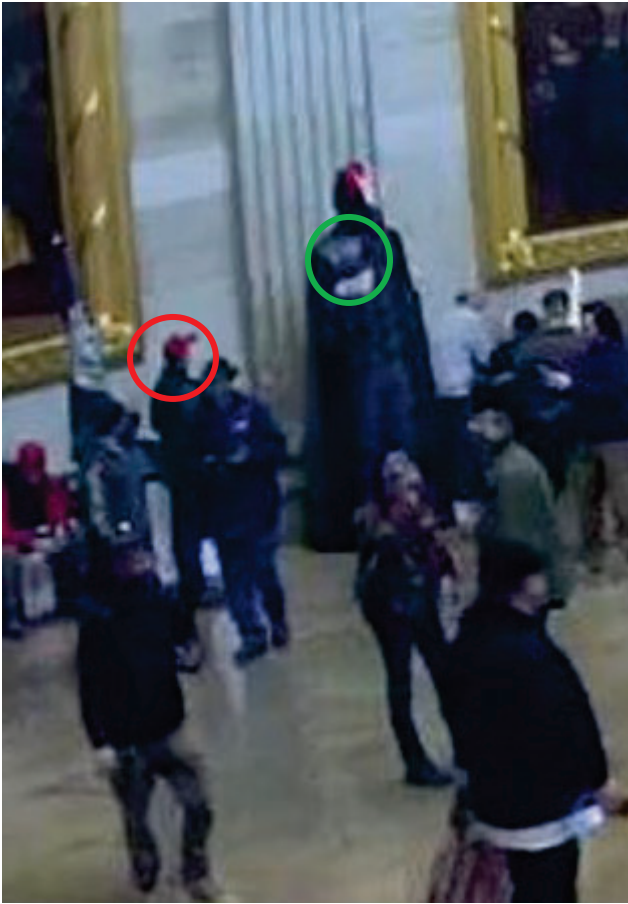
COOMER, ABATE, and HELLONEN are next observed inside the Memorial Door.



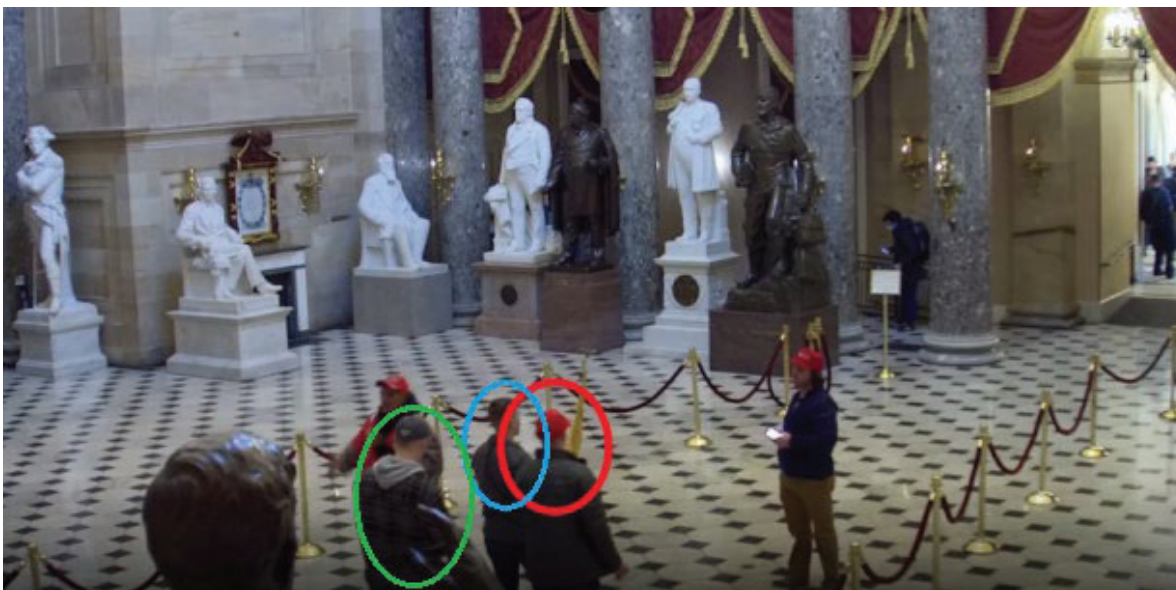
At approximately 2:32 PM EST, COOMER, ABATE, and HELLONEN enter the Rotunda through the South entrance. The group remained in the Rotunda for a couple minutes before leaving through the South entrance.



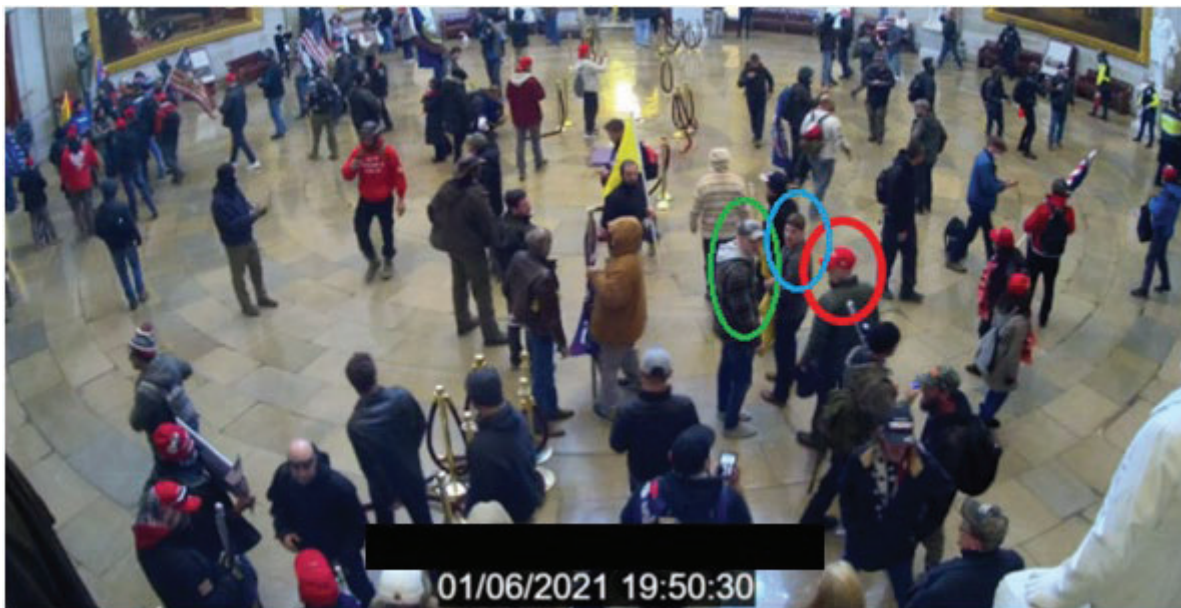
While inside, they placed a red MAGA hat on one of the statues to take photos with it.



COOMER, ABATE, and HELLONEN are then observed inside the Statuary Hall.



COOMER, ABATE, and HELLONEN return to the Rotunda through the South entrance. The group remains inside the Rotunda for approximately 30 minutes until police arrive and form a line to direct people out of the Building.

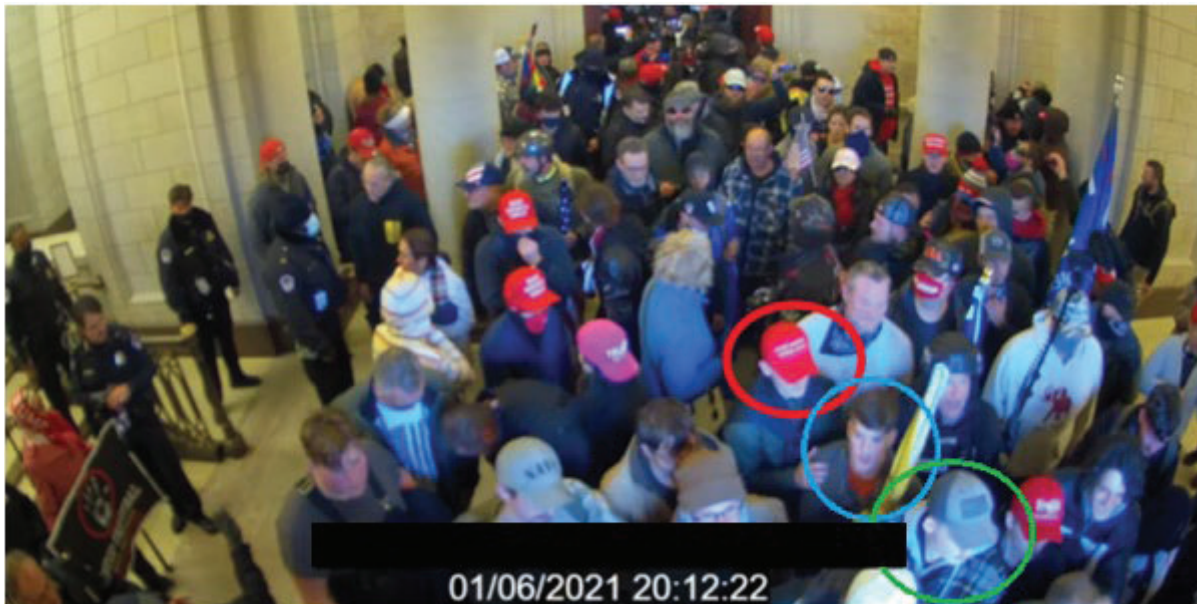


As COOMER, ABATE, and HELLONEN traveled throughout the U.S. Capitol Building, surveillance camera footage captured all three of the men using their cellular devices to take pictures, videos, and answer phone calls.



At approximately 3:12 PM EST, COOMER, ABATE, and HELLONEN exit the U.S. Capitol Building through the Rotunda Door having been inside for approximately 52 minutes.

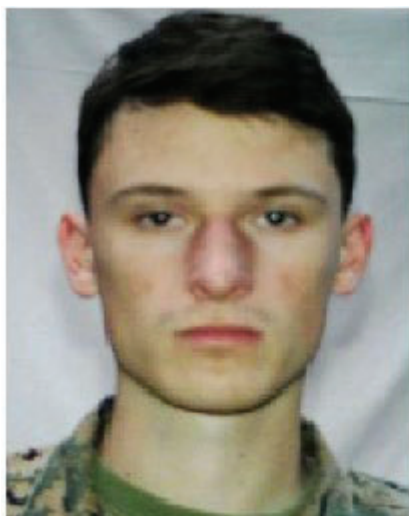




3. Identification of COOMER, ABATE, and HELLONEN

A. COOMER

COOMER's military identification card, also known as a common access card (CAC), was compared to the profile picture of Instagram account "mrcoomer08" and a picture captured outside the U.S. Capitol on January 6, 2021. The individual in all three photographs had similar facial features. Additionally, these photographs were a positive match when compared to COOMER's Indiana driver's license.



Military Common Access Card



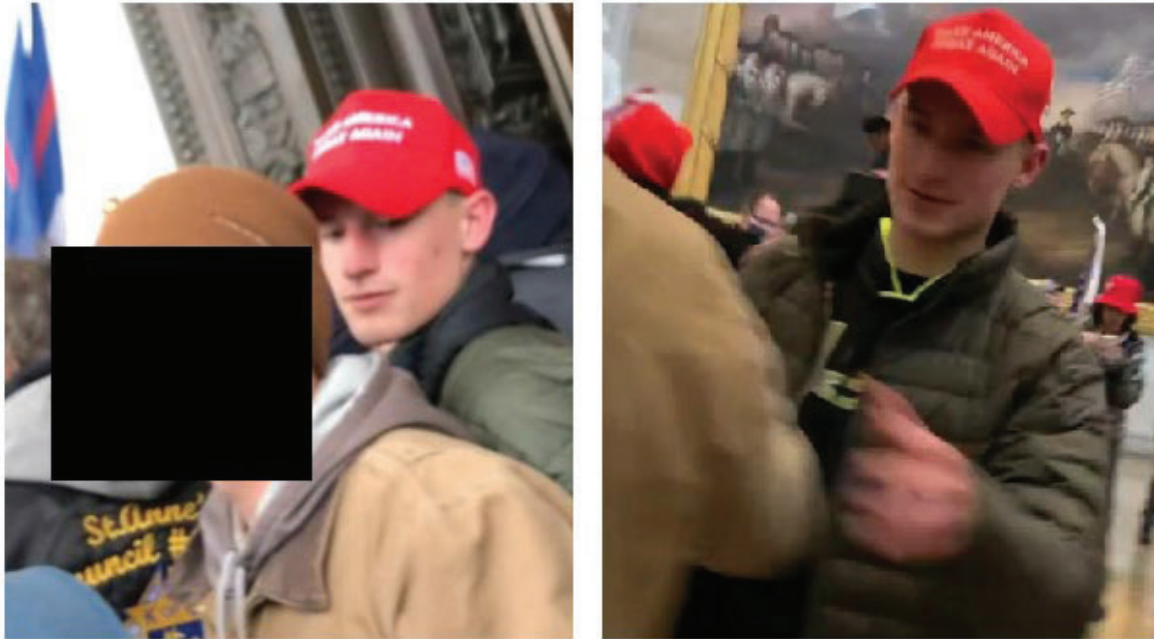
Instagram Profile Picture



January 6, 2021

Witness 1, a member of the U.S. Marine Corps who was stationed at Marine Corps Base Quantico with COOMER, identified COOMER from footage captured inside the U.S. Capitol

Building. In two of the photographs, below, Witness 1 was able to positively identify the individual as COOMER.



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 at the U.S. Capitol the same day, the cell phone associated with Phone 7358 was identified as having utilized a cell site consistent with providing service to a geographic area that included the interior of the U.S. Capitol Building at some point from approximately 1300 to 1830 on January 6, 2021.

#### B. HELLONEN

HELLONEN's CAC was compared to a picture captured outside the U.S. Capitol on January 6, 2021. The individual in both photographs had similar facial features. Additionally, these photographs were a positive match when compared to HELLONEN's Michigan driver's license.



Military Common Access Card



January 6, 2021

Witness 2, a member of the U.S. Marine Corps who was stationed Marine Corps Base Camp Lejeune with HELLONEN, identified HELLONEN from his military CAC and footage captured inside the U.S. Capitol Building, below.



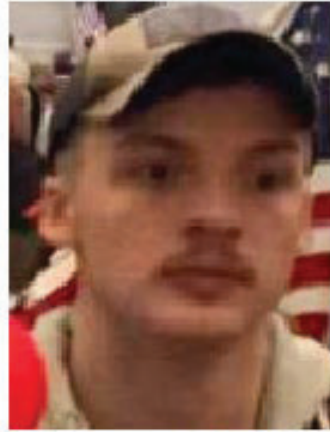
Military records identified HELLONEN's telephone number as XXX-XXX-0119 (Phone 0119). Phone 0119 was also identified as having utilized a Verizon cell site consistent with providing service to a geographic area that included the interior of the U.S. Capitol Building at some point from approximately 1300 to 1830 on January 6, 2021.

C. ABATE

ABATE's CAC was compared to a pictured captured inside the U.S. Capitol on January 6, 2021. The individual in both photographs had similar facial features. Additionally, these photographs were a positive match when compared to ABATE's Virginia driver's license.



Military Common Access Card



January 6, 2021

Witness 3, a member in the U.S. Marine Corps, identified ABATE from his military CAC and footage captured inside the U.S. Capitol Building, both photographs provided above.

Additionally, on or about June 1, 2022, ABATE was interviewed as part of his security clearance. During the interview, ABATE discussed entering the U.S. Capitol Building on January 6, 2021 with two "buddies". ABATE stated they walked through the U.S. Capitol and in the Rotunda. While in the Rotunda, ABATE's friend smoked a cigarette and they "walked around and tried not to get hit with tear gas". ABATE also admitted he heard how the event was being portrayed negatively and decided that he should not tell anybody about going into the U.S. Capitol Building.

Based on the foregoing, your affiant submits that there is probable cause to believe that COOMER, ABATE, and HELLONEN 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 for 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 COOMER, ABATE, and HELLONEN 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 the 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.



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KELSEY RANDALL  
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 17th day of January, 2023.

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ZIA M. FARUQUI  
U.S. MAGISTRATE JUDGE