

Case: 1:23-mj-00049
Assigned To : Harvey, G. Michael
Assign. Date : 2/28/2023
Description: Complaint W/ Arrest Warrant

STATEMENT OF FACTS

Your affiant, Thomas McCormick is an Amtrak Police Detective assigned to Federal Bureau of Investigation. In my duties as a Detective, I investigate matters pertaining to domestic terrorism, sovereign citizen matters, and other national security matters. My investigative duties include, but are not limited to, interviewing potential witnesses and victims, conducting database checks, reviewing social media accounts, reviewing data acquired from cell phones and other digital media, and reviewing other material acquired by various legal processes. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a Detective, 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.

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.

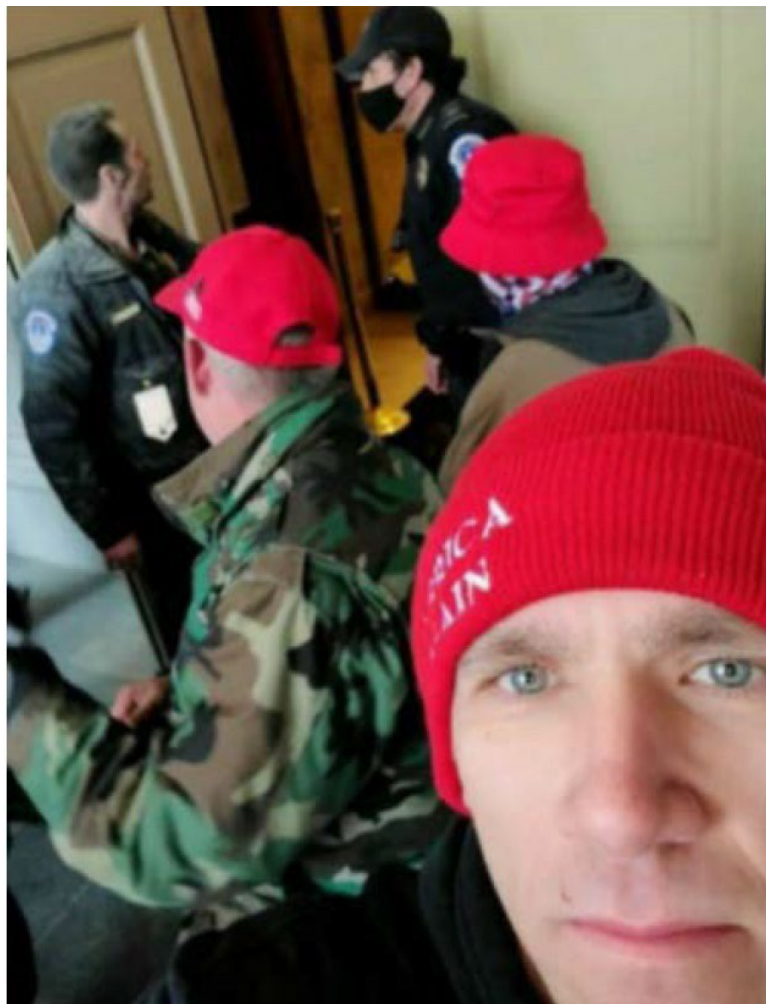
Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress 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.

Ronald Andrulonis' Participation on January 6, 2021

On January 12, 2021, the FBI received a tip to the National Operations Threat Center which stated RONALD ANDRULONIS, an Amtrak employee, entered the United States Capitol on January 6, 2021. Amtrak's Office of Inspector General confirmed an ongoing investigation into RONALD ANDRULONIS based on similar tips. The below "selfie" of RONALD ANDRULONIS was provided, anonymously, along with information the photograph was an Instagram post ANDRULONIS had circulated to Amtrak employees himself. The uniforms on the officers seen in the foreground of the "selfie" are consistent with that of the United States Capitol Police. The hat ANDRULONIS is wearing in the "selfie" is also consistent with the red hat he is captured wearing in surveillance and open-source media from January 6, 2021.

Image 1



W-1, who worked directly with ANDRULONIS, was interviewed, and identified RONALD ANDRULONIS as the person in **Image 1**. W-1 provided Agents with ANDRULONIS' Amtrak employee timesheet which confirmed ANDRULONIS did not report to work, as scheduled, on January 6, 2021.

Records obtained through a search warrant for records in possession of Google, revealed a device associated with 215-528-9830 was in or around the Capitol on January 6, 2021. A subpoena, served on Verizon, confirmed the subscriber of telephone number 215-528-9830 to be RONALD ANDRULONIS.

Your Affiant reviewed Amtrak surveillance, Capitol closed caption television (CCTV), and open-source media from January 6, 2021. Amtrak surveillance captures ANDRULONIS (yellow square), and ASSOCIATE 1 (red square), on a platform of 30th Street Station, in Philadelphia, at approximately 4:28AM (**Image 2**). ANDRULONIS is seen wearing jeans, tan boots, and a red hat while ASSOCIATE 1 is wearing black shoes, black jacket, a dark hooded sweatshirt, and blue jeans. ANDRULONIS arrived at Union Station, in Washington D.C., at approximately 6:55AM. ANDRULONIS returned to Philadelphia at approximately 5:56pm (**Image 3**) and was captured in the same jeans, boots, and hat while donning a Trump black hooded sweatshirt with the American flag running vertically.

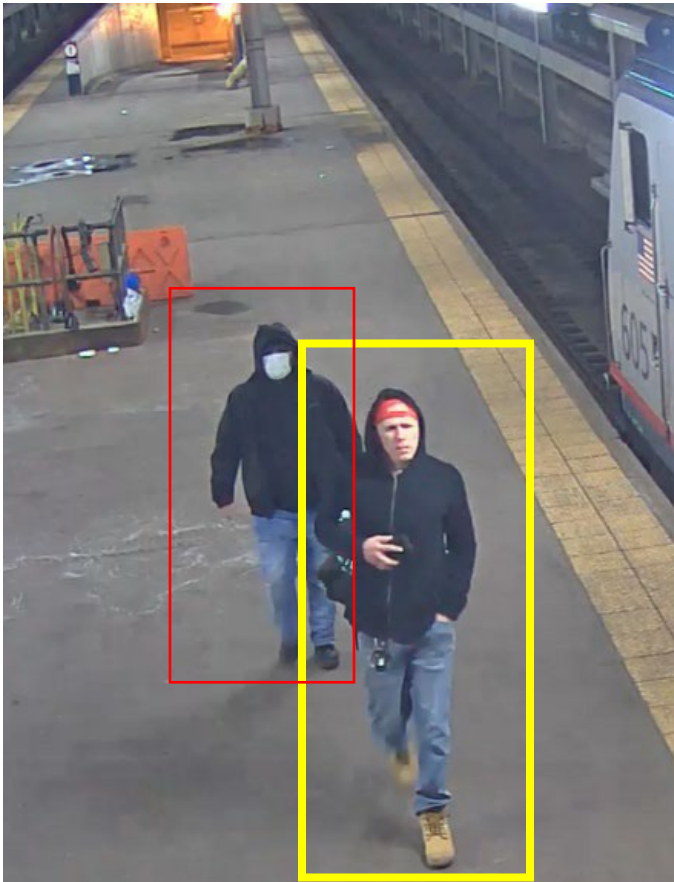


Image 2



Image 3

Open-source video captured RONALD ANDRULONIS attending the ‘Stop the Steal’ rally before walking down to the Capitol grounds (**Image 4**).



Image 4

CCTV captured ANDRULONIS entered the Capitol at approximately 2:24PM via a window adjacent to the Senate Wing doors as seen in **Image 5**:

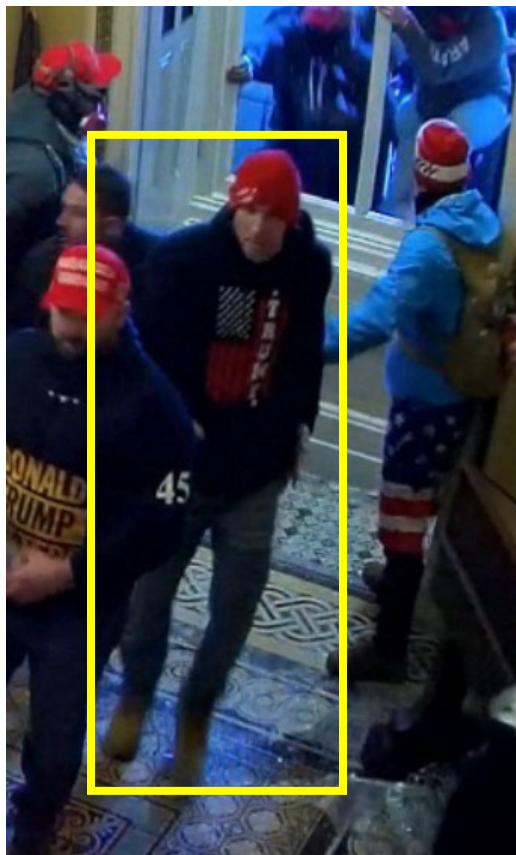


Image 5

Once inside, RONALD ANDRULONIS and ASSOCIATE 1 traveled through varying areas of the Capitol (**Image 6**) including the Supreme Court Chamber Stairs (**Image 7**) and the Rotunda, where ASSOCIATE 1 is captured knocking over barriers while ANDRULONIS appeared to either record or photograph the room (**Image 8 and 9**).

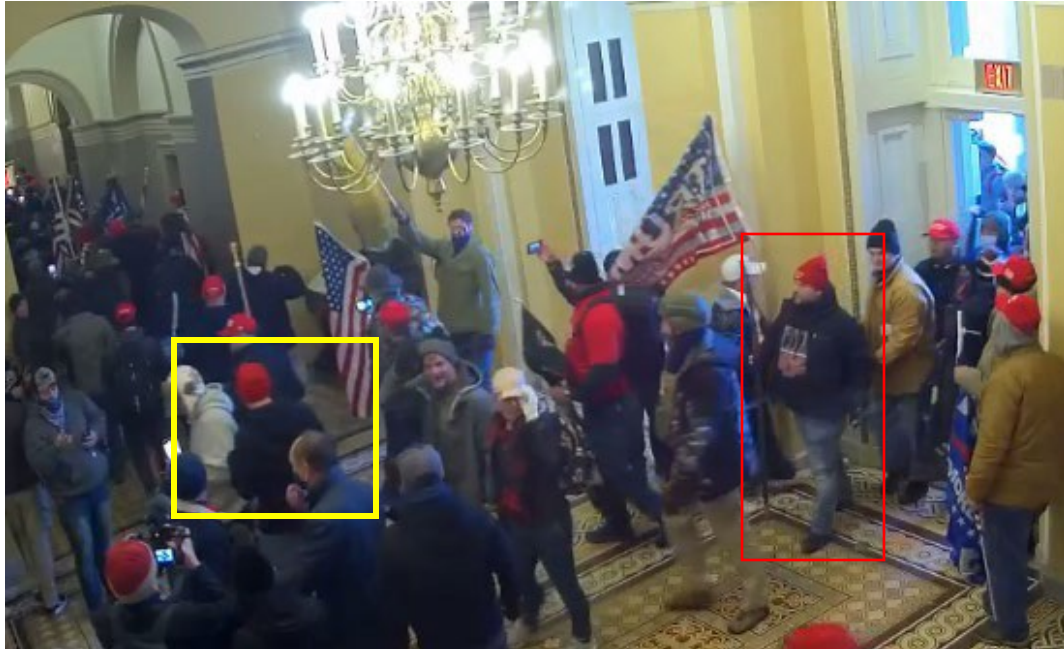


Image 6

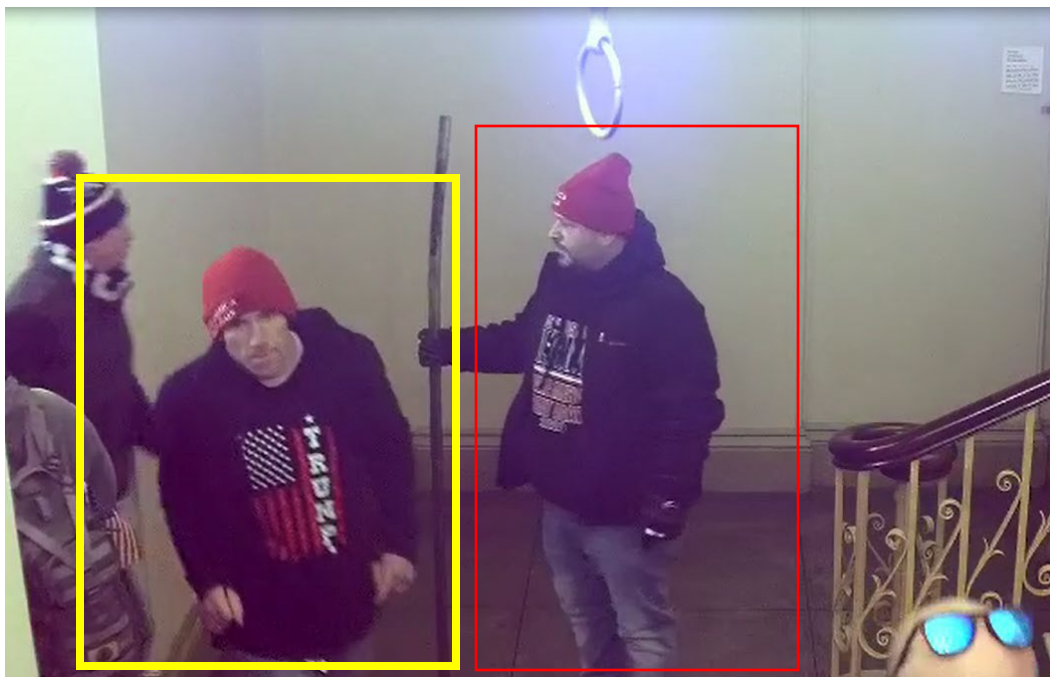


Image 7

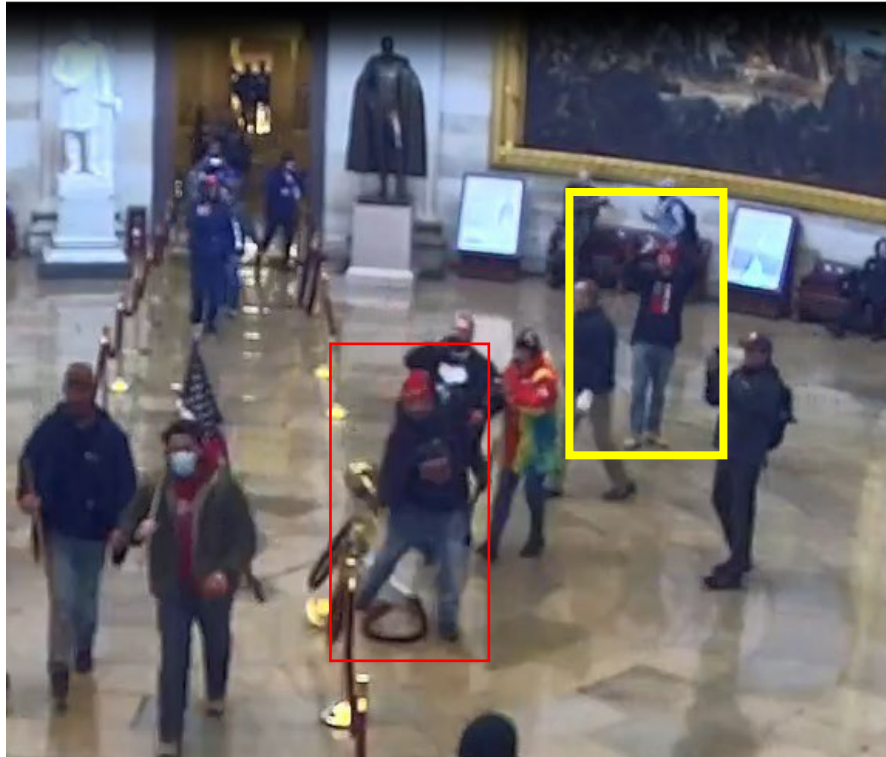


Image 8

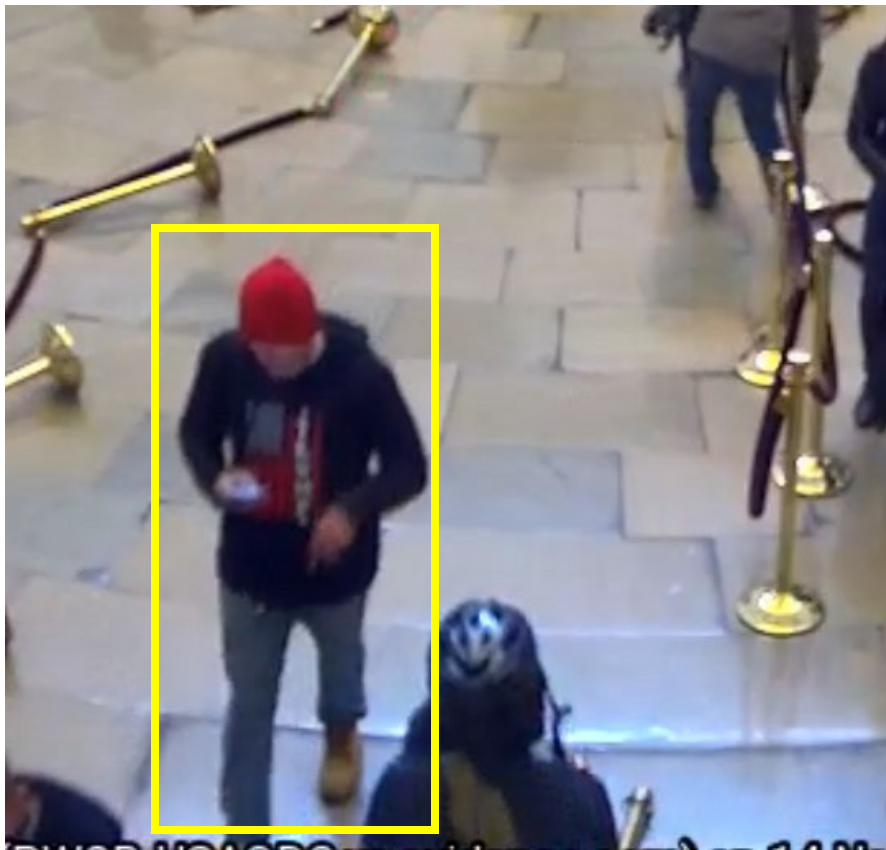


Image 9

RONALD ANDRULONIS and ASSOCIATE 1 then appear to separate. ANDRULONIS entered a U.S. Senator's office, as captured in the background of the below open-source image, **Image 10**:

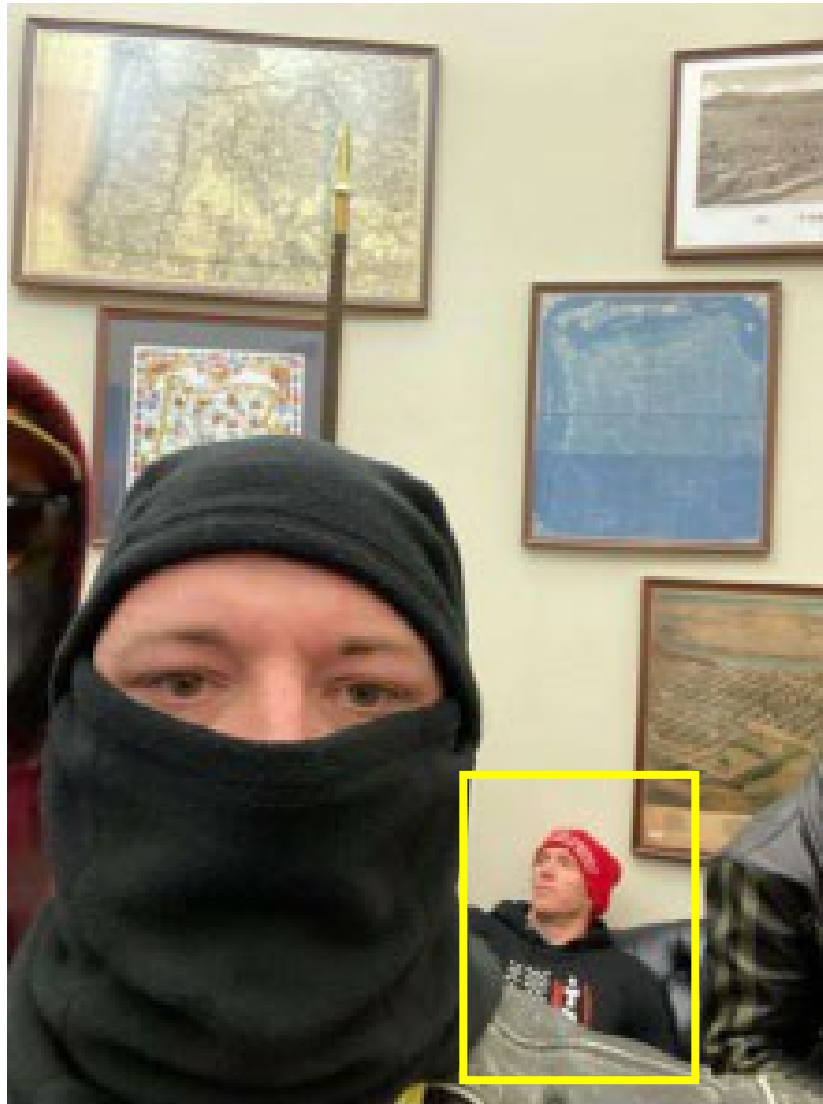


Image 10

RONALD ANDRULONIS then made his way to the Crypt Lobby where he was captured on CCTV and open-source media as seen in **Image 11**. RONALD ANDRULONIS eventually exited the Capitol Building via the Memorial Door.

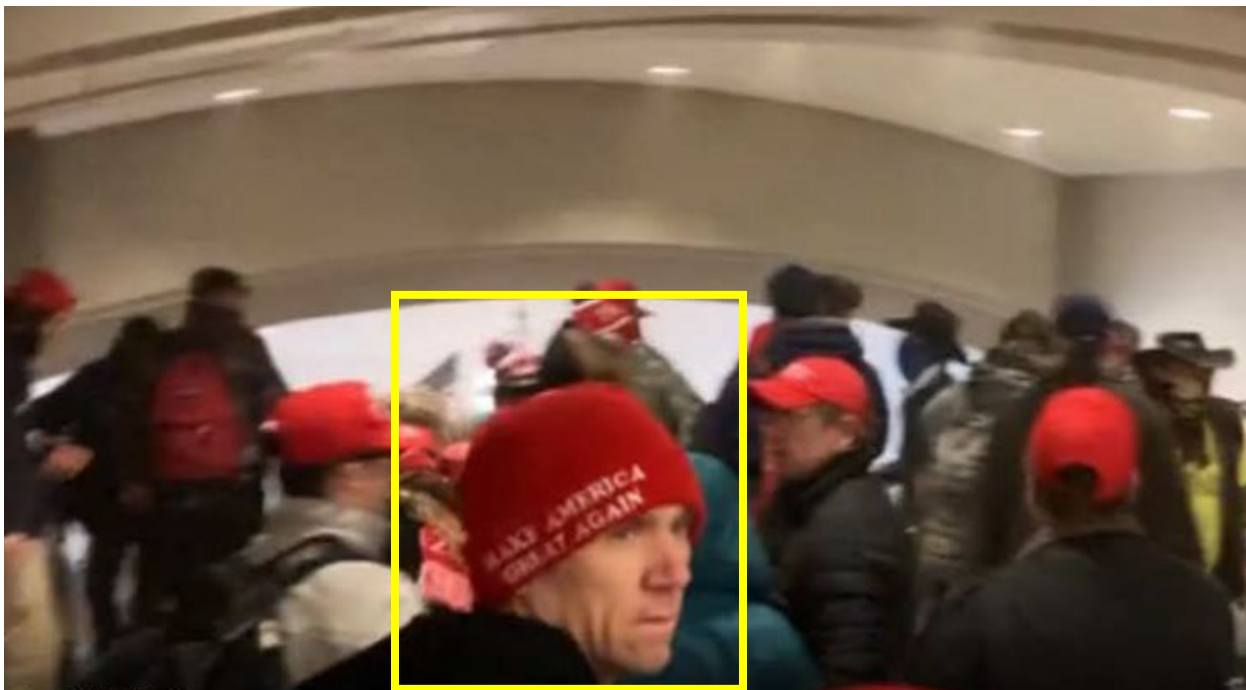


Image 11

Based on the foregoing, your affiant submits that there is probable cause to believe that RONALD ANDRULONIS 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. 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 RONALD ANDRULONIS 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 Buildings.



Thomas McCormick
Amtrak Police Department
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone, this 28th day of February 2023.

G. MICHAEL HARVEY
U.S. MAGISTRATE JUDGE