

## STATEMENT OF FACTS

Your affiant, [REDACTED], is a Task Force Officer assigned to the Federal Bureau of Investigation. In my duties as a Task Force Officer, I am assigned to investigate violations of federal laws, including 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, 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.

### Identification of Tyler Campanella

According to records obtained through a search warrant served on Verizon Wireless, on January 6, 2021, the cellphone associated with a phone number ending in 3931 (the Subject Phone Number) was identified as having used utilized a cell site consistent with providing service to a geographic area that includes the interior of the United States Capitol building. Legal process to Verizon Wireless identified the subscriber as Sigalit Flicker at Bayside Chrysler CJ LLC (“Bayside Chrysler”), 21219 Northern Blvd, Bayside, New York. The records identify Tyler Campanella as an authorized account user and associate him with the Subject Phone Number. Based upon the facts learned during the investigation, including statements made on Flicker’s social media accounts, I know that Flicker is Campanella’s step-mother.

A search of publicly available resources identified Tyler Campanella as an employee of Bayside Chrysler.<sup>1</sup> The FBI confirmed that Tyler Campanella as an employee of Bayside Chrysler by speaking to another employee of the business.

The FBI reviewed open-source videos and other materials, including videos available on YouTube, Twitter, and Instagram. Your affiant observed an open-source video that, based upon my review of open source images of Campanella, appears to show Campanella inside the Capitol on January 6, 2021:

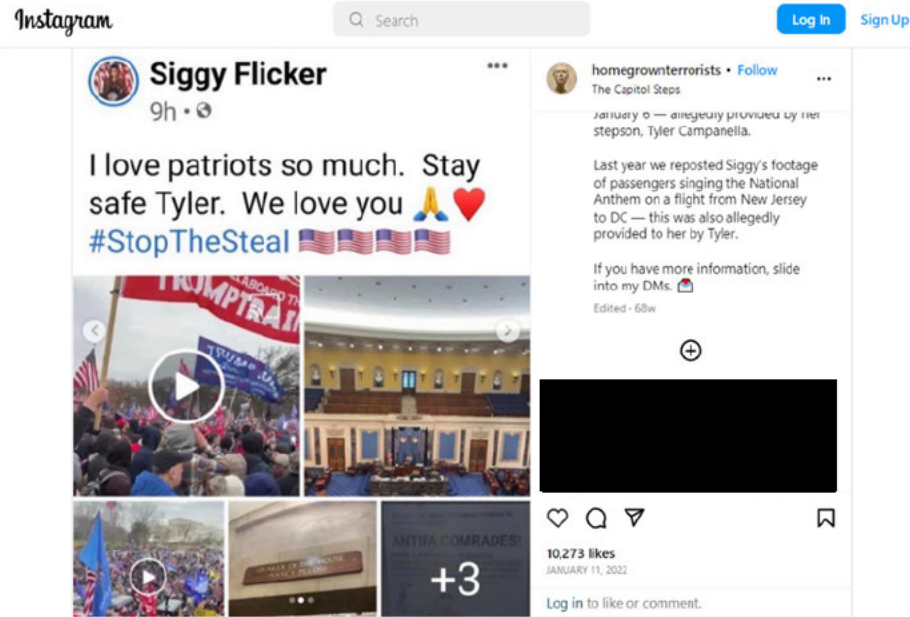


*Image 1:* Screenshot of a video showing Campanella, circled in red.

In addition, your affiant observed an Instagram post that appears to contain a screenshot of an Instagram post from Flicker’s account:

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<sup>1</sup> See <https://www.baysidechryslerjeepdodge.net/team-bayside-chrysler-jeep-dodge-in-bayside-ny>.



**Image 2:** Screenshot of an Instagram post from “homegrownterrorists” that appears to contain a screenshot from an Instagram post from Flicker’s Instagram account

The post contains images of what appears to be both outside and inside of the Capitol on January 6, 2021, and appears to indicate that Tyler Campanella is at the Capitol. The post does not currently appear on Flicker’s Instagram account. I have reviewed other posts from the account “Siggy Flicker” and, based on that review, believe Flicker to be the owner of that account.

The FBI identified and spoke to Witness 1, an individual who had known Campanella for over six years before January of 2021, and had maintained regular contact with Campanella at the time of the interview. An agent showed Witness 1 images from January 6, 2021, including Image 3 and 4 below. Witness 1 identified the individual in the images as Campanella.



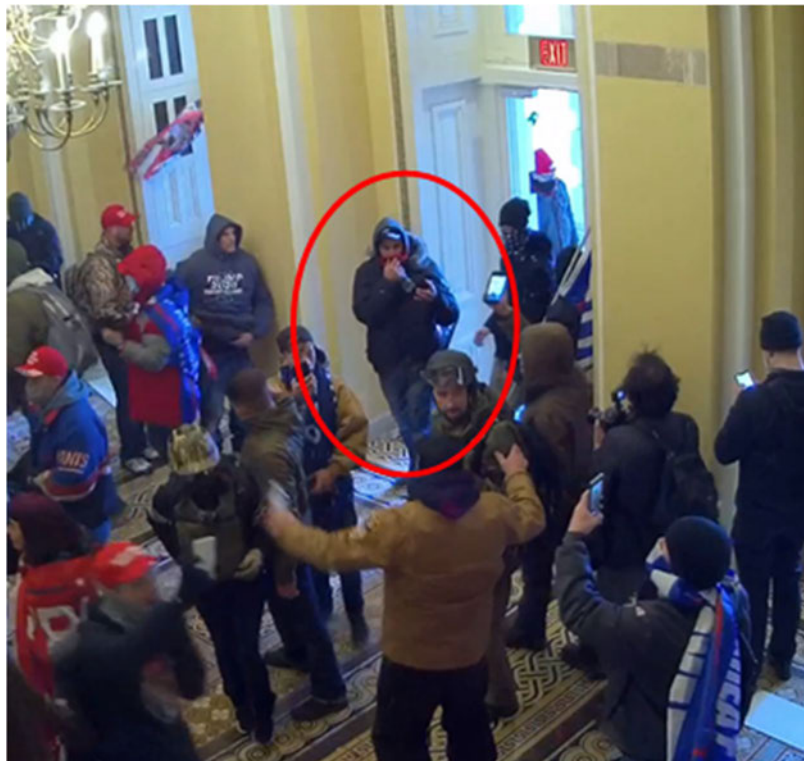
**Images 3 and 4:** Two images shown to Witness 1. Witness 1 identified the individual circled in red in both images as Campanella (the red circles were absent in the images shown to Witness 1)

In the images, Campanella is wearing a blue baseball hat with “TRUMP” and “2020” in white lettering, and words in red lettering between the two. Campanella is also wearing a black jacket with what looks like a fur collar and a grey sweatshirt with the hood up. Campanella also has a

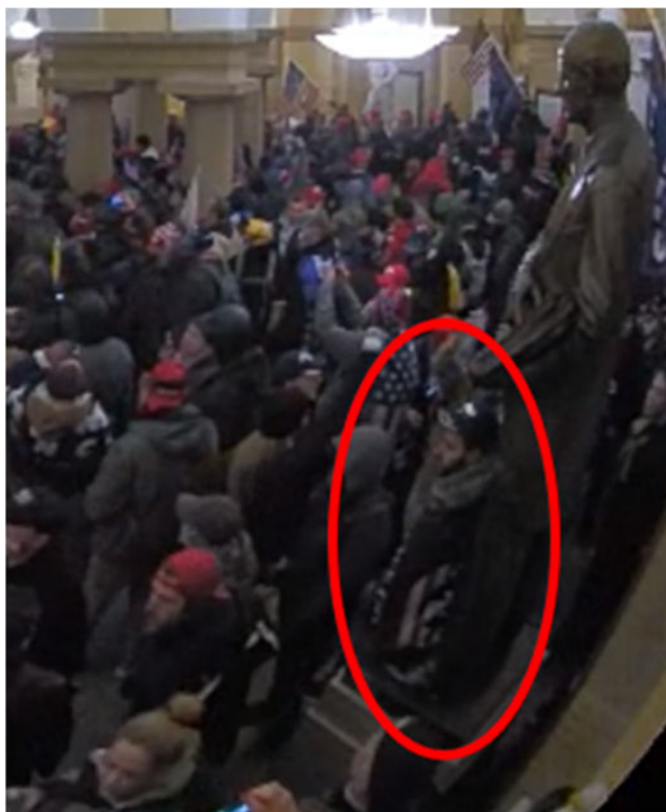
red scarf that, in one image, he holds up to cover his nose and mouth. Witness 1 stated that Witness 1 understood that Campanella went into the Capitol on January 6, 2021, took pictures and video, and, afterwards, decided to delete all of the pictures from January 6, 2021, that Campanella had posted on his social media accounts.

Tyler Campanella's Conduct on January 6, 2021

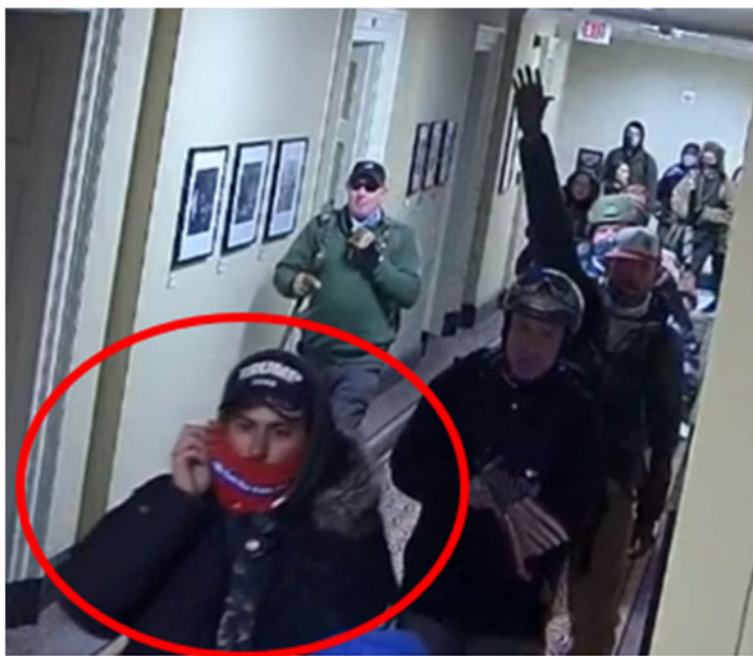
By reviewing CCV from the Capitol, the FBI was able to identify an individual that appears to be Campanella at various locations inside the Capitol. Based upon the CCV footage, it appears that Campanella entered the Capitol at approximately 2:17 pm through the Senate Wing doors. Additional CCV video shows Campanella at various locations through the Capitol, including sitting on the base of a statue in the Capitol Crypt, walking around the Rotunda, walking into the Senate Gallery for approximately one minute, and leaving through the Rotunda doors at approximately 2:52 pm.



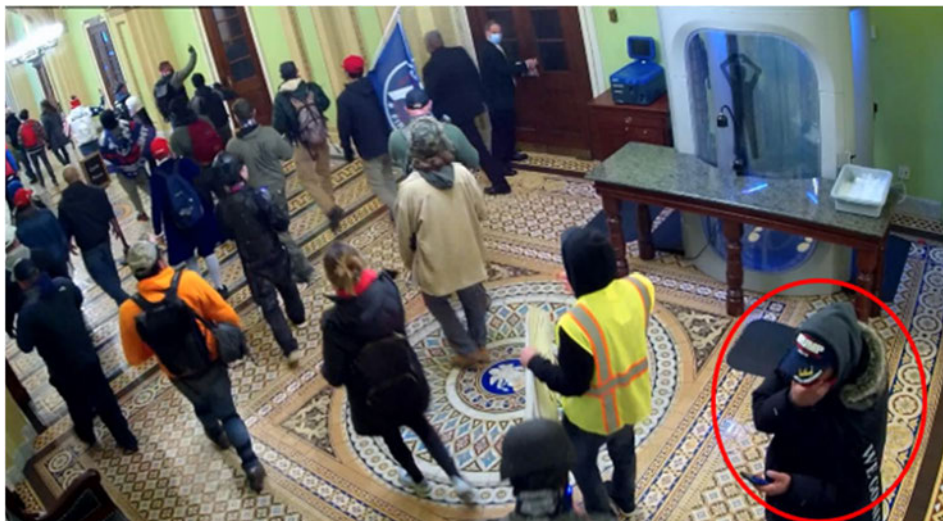
**Image 5:** Screenshot from CCV of Campanella (circled in red) after entering the Capitol through the Senate Wing Doors.



**Image 6:** Screenshot from CCV footage in the Crypt showing Campanella (circled in red) sitting on the base of a statue in the Crypt



**Image 7:** Screenshot from CCV footage showing Campanella (circled in red) in a hallway on the Second Floor of the Capitol

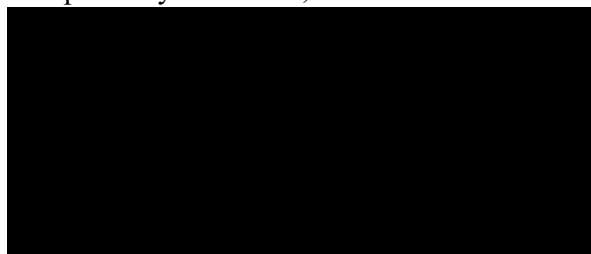


**Image 8:** Screenshot from CCV footage showing Campanella (circled in red) in the hallway outside of the entrance to the Senate Gallery

Based on the foregoing, your affiant submits that there is probable cause to believe that Tyler Campanella 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 Tyler Campanella violated 40 U.S.C. § 5104(e)(2) (B), (D), and (G), which makes it a crime to willfully and knowingly (B) enter or remain in the gallery of either House of Congress in violation of rules governing admission to the gallery adopted by that House or pursuant to an authorization given by that House; (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.

Respectfully submitted,



Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 26th day of January 2024.

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MOXILA A. UPADHYAYA  
U.S. MAGISTRATE JUDGE