

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
AND ARREST WARRANT**

I, [REDACTED], being first duly sworn, hereby depose and state as follows:

PURPOSE OF AFFIDAVIT

1. I make this affidavit in support of an application for an arrest warrant for MICHAEL SNOW, JR.

2. Your affiant, [REDACTED], is a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Washington Field Office. I have been a Special Agent since February of 2019, during which time I have investigated criminal violations involving international terrorism, domestic terrorism, and crimes aboard aircraft. 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.

3. The facts of this affidavit come from my review of the evidence, my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts of which I have hearsay knowledge. This affidavit merely intends to show that sufficient probable cause exists for the requested warrants and does not set forth all of my knowledge about this matter.

FACTUAL BACKGROUND

4. On July 24, 2024, several groups applied for and were granted permits to demonstrate on the National Mall. An organization was granted a sole permit for the area of Columbus Circle, which is located at the intersection of Massachusetts Avenue Northeast and E Street Northeast, Washington, D.C., directly in front of Union Station.

5. In anticipation of the demonstrations, members of the United States Park Police (“USPP”), U.S. Capitol Police (“USCP”), and the Metropolitan Police Department (“MPD”) were present around Columbus Circle and other parts of downtown Washington, D.C.

6. Demonstrators began to gather in Columbus Circle starting at approximately 2:50 p.m. At approximately 3:26 p.m., the USPP revoked the permit that had been issued to the organization. Pursuant to regulation, organizers must undertake, in good faith, all reasonable action to provide sufficient “marshals” to ensure good order and self-discipline during the demonstration. *See* 36 CFR 7.96 (g)(5)(xii). The USPP attempted to locate the organization’s marshals multiple times but were unable to find them. At approximately 3:26 p.m., a USPP Lieutenant called the individual permit holder. The permit holder failed to answer his phone and the call went directly to voicemail. The USPP Lieutenant left a voicemail officially revoking the organization’s permit.

7. Despite the revocation of the permit, demonstrators remained in and around Columbus Circle until approximately 5:00 p.m. From approximately 2:59 p.m. until 5:00 p.m., individuals in Columbus Circle pulled down flags affixed to the flagpoles; burned flags and objects; interfered with law enforcement’s ability to place individuals under arrest; and sprayed graffiti on multiple statutes and structures.

8. The flags pulled down from the flag poles, and the statutes and structures in Columbus Circle, are all property of the federal government. The National Park Service estimated the total cost to clean up and repair the site at \$11,282.23.



Figure 1: Picture of Columbus Circle, Including the Fountain and Three Flagpoles

FACTS SUPPORTING PROBABLE CAUSE

9. On July 24, 2024, a little after 3:00 p.m., open-source and USCP CCTV footage captured two individuals lower an American flag affixed to the eastern flagpole in Columbus Circle.



Figure 2: Screenshot from Open-Source Footage of Two Individuals Lowering the American Flag in Columbus Circle

10. After being lowered, the flag fell to the ground, still attached to the halyard by snap hooks.

11. At approximately 3:14 p.m., open-source and USCP CCTV footage shows another individual, later identified as MICHAEL SNOW, JR. (“SNOW”), wearing a red shirt with black lettering, dark colored shorts, a red & white keffiyeh wrapped around his waist, white socks, white Nike shoes with a red Nike logo, and a necklace with a red, white, and green pendant, grabbed the flag and carried it into the crowd of protesters.



*Figure 3: Screenshot from USCP CCTV of SNOW (circled in yellow)
Grabbing the Flag from the Halyard*



Figure 4: Screenshot from Open-Source Footage Showing SNOW Holding the Flag after Removing it from the Halyard.

12. After throwing the flag onto the ground, SNOW produced a lighter and held it up to the flag in an apparent effort to light the flag on fire. SNOW was initially unsuccessful and yelled to the crowd: “I need a better lighter!” Individuals who surrounded SNOW were chanting “Burn that shit!”



Figure 5A: Screenshot from Open-Source Footage of SNOW's Initial Attempt to Light the Flag on Fire



Figure 5B: Zoomed in Screenshot from Open-Source Footage of SNOW's Initial Attempt to Light the Flag on Fire

13. Another open-source video depicts another angle of SNOW's initial attempt to light the flag on fire. In that video, a cochlear implant device is visible behind SNOW's left ear, as noted by the yellow arrow below.

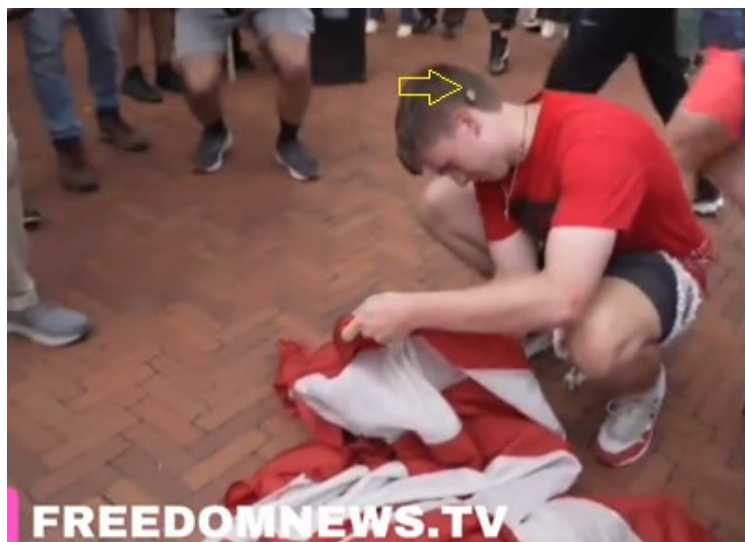


Figure 6: Screenshot from Open-Source Media of SNOW

14. After the failed attempt to light the flag on fire, an unidentified individual in the open-source video says, “lighter fluid!” An unidentified individual then handed SNOW a white bottle with red top.



Figure 7: Screenshot from Open-Source Footage of SNOW Taking Lighter Fluid from Unidentified Individual

15. The unobstructed portion of the bottle’s label reads: “CHARCOAL LIGHTER” with a BBQ grill graphic. Through open-source research, your affiant determined that the bottle handed to SNOW appears to be “Weis Simply Great Lighter Fluid Charcoal,” as depicted below.



Figure 8: Image from Weis.com of Weis Simply Great Lighter Fluid Charcoal

16. After receiving the bottle of lighter fluid, SNOW doused the flag with liquid from the bottle.



Figure 9: Screenshot from Open-Source Footage Showing SNOW Dousing the Flag with Lighter Fluid

17. The open-source footage then shows that, as SNOW doused the flag with lighter fluid, an unidentified individual tossed SNOW what appeared to be a butane jet lighter. Another individual (“SUSPECT 2”) approached the flag and produced a lighter. Both SNOW and SUSPECT 2 used their lighters to ignite the lighter fluid and set the flag on fire.



Figure 10: Screenshot from Open-Source Footage of SNOW and SUSPECT 2 Lighting the Flag on Fire

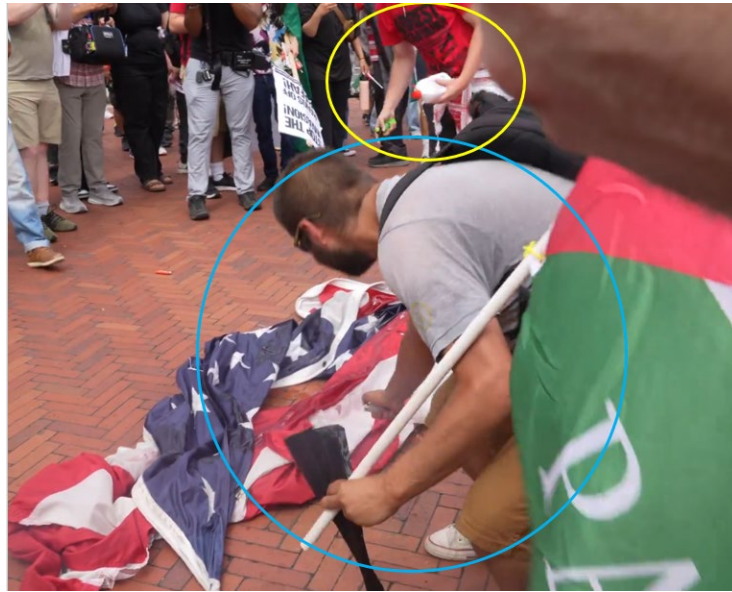


Figure 11: Screenshot from Open-Source Footage of Snow (Circled in Yellow) and SUSPECT 2 (Circled in Blue) Holding Lighters to the Flag



Figure 12: Screenshot from Other Open-Source Footage of Snow (Circled in Yellow) and SUSPECT 2 (Circled in Blue) Lighting Flag on Fire

18. After setting the flag on fire, SNOW stepped back to stand on the steps of the flag pedestal while SUSPECT 2 paraded around the burning flag.



Figure 13: Screenshot from Open-Source Footage Depicting SNOW (Circled in Yellow) on the Flag Pedestal while SUSPECT 2 (Circled in Blue) Paraded Around the Burning Flag.

Identification of SNOW

19. On or about July 25, 2024, a user on the social media platform “X” (formerly Twitter), posted pictures in an apparent effort to identify SNOW. The pictures appeared to be from (1) the demonstration in Columbus Circle on July 24, 2024, including an image of SNOW wearing the distinctive red shirt and necklace; and (2) a demonstration that occurred at the University of North Carolina on May 5, 2024 of an individual who appeared to be SNOW holding a banner associated with “PSLCarolinas.”

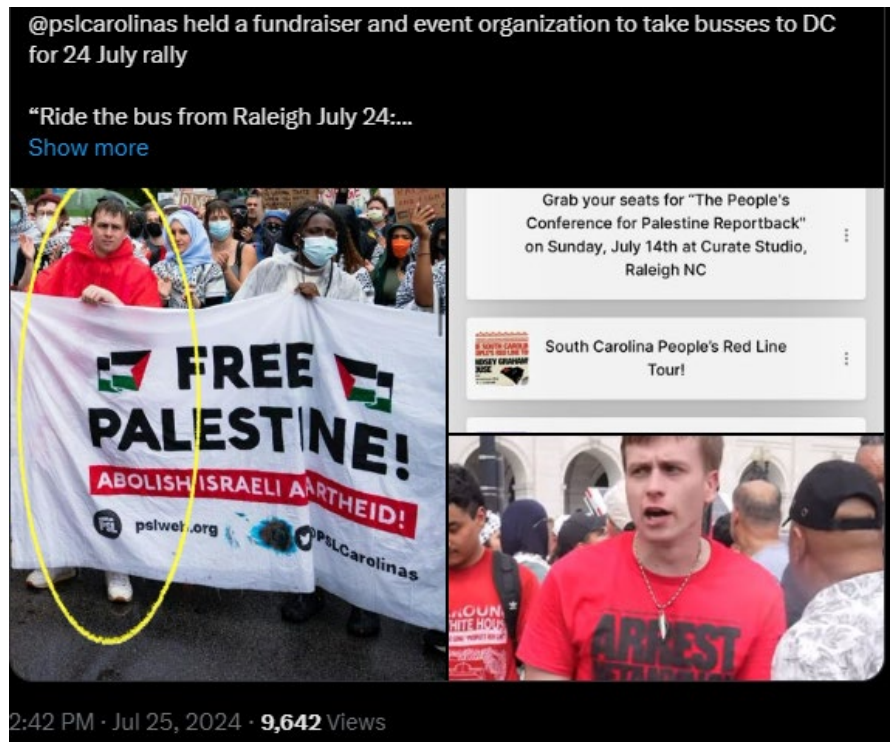


Figure 14: Screenshot of X Post

20. Your affiant conducted open-source research and determined that “PSLCarolinas” is a Carolina-based offshoot of an organization called “Party for Socialism and Liberation.”

21. Based on the information that SNOW may be from the Carolinas, the FBI identified a driver’s license photograph of an individual residing in North Carolina named MICHAEL SNOW, Jr. (“SNOW”). The individual depicted in the DMV photograph of SNOW appeared consistent with the person who lit the flag on fire on July 24, 2024.

22. In October 2024, after learning the address associated with SNOW’s North Carolina driver’s license, law enforcement conducted physical surveillance at the address, which is in Durham, North Carolina (hereinafter “the PREMISES”). During surveillance, law enforcement observed SNOW coming and going from the PREMISES.

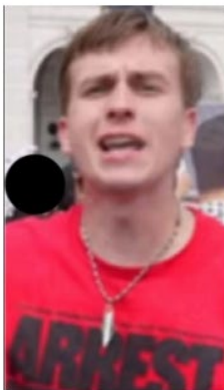
23. As a result of physical surveillance and record checks, law enforcement was also able to determine where SNOW worked and conducted physical surveillance at that address.

24. On or about December 3, 2024, law enforcement observed SNOW and confirmed that SNOW appears to be the same individual who lit the flag on fire on July 24, 2024. In particular, law enforcement observed a cochlear implant affixed above SNOW's left ear.

25. Law enforcement also interviewed two individuals (W-1 and W-2) who personally know SNOW and interact with him regularly. During those interviews, law enforcement showed W-1 and W-2 the FBI bulletin seeking information on suspects who committed crimes on July 24, 2024. W-1 and W-2 each identified SNOW as Suspect #1 in the bulletin:

DESTRUCTION OF FEDERAL PROPERTY AND ASSAULT OF FEDERAL OFFICERS

Unknown Suspects
Washington, D.C.
July 24, 2024



Suspect #1



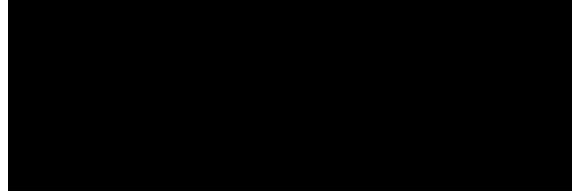
Suspect #2



Suspect #4

Figure 15: FBI Bulletin Seeking Information

26. Based on the foregoing, your affiant submits there is probable cause to believe that SNOW violated 18 U.S.C. § 1361 by willfully injuring or depre dating any property of the United States in an amount less than \$1,000.



Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 6th day of December 2024.

MATTHEW J. SHARBAUGH
U.S. MAGISTRATE JUDGE