

STATEMENT OF FACTS

Your affiant, [REDACTED] is a Federal Bureau of Investigation (“FBI”) Special Agent at the [REDACTED]. In my duties as a special agent, I investigate domestic terrorism matters to include criminal violent acts. 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 of the Events of January 6, 2021

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.

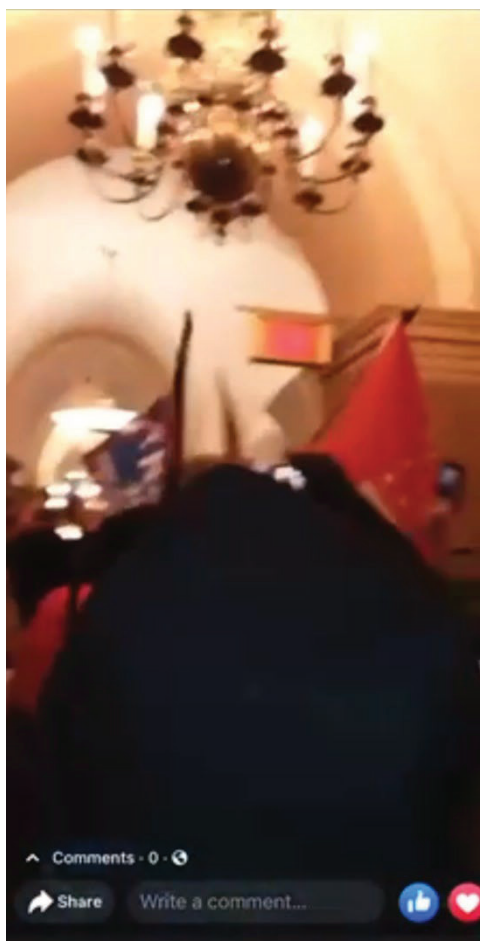
At such time, the certification proceedings were still underway, and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, around 2:00 p.m., individuals 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.

Facts Specific to Karla and Dustin Adams

On or about February 1, 2021, the FBI received a tip to its National Threat Operations Center that “Karla Embach” and her husband, “Dusty,” went inside the U.S. Capitol building on January 6, 2021. The tipster said that Karla and Dusty had traveled to Washington, D.C. via bus with a large group from Hillsdale, Michigan. The tipster also provided a screen recording of a video that Karla Embach posted on her Facebook page. The video, which appears to have been shot on a cell-phone, captured an individual walking with a large group of people who were chanting “USA” repeatedly. No individual is identifiable in the video. But according to U.S. Capitol Police, the video was taken along a hallway inside the Capitol building that leads to the Crypt. A screenshot is depicted here:



The FBI followed up with the tipster to request a copy of the video originally submitted to the tipline. The tipster emailed the FBI a copy of a screengrab from the Facebook profile of “Karla Adams.” Returns from a search warrant executed on Facebook confirmed that the “Karla Adams” profile is used by KARLA ADAMS (“K. ADAMS”) and is associated with a particular phone number with area code [REDACTED]

An Accurint report showed that Karla Embach’s legal name is Karla Adams; that K. ADAMS is married to Dustin Adams (“D. ADAMS”); that both lived in Hillsdale, Michigan as of January 6, 2021; and that K. ADAMS is authorized user of the [REDACTED] number. According to records obtained through a search warrant and other legal process served on Verizon Wireless, the mobile device associated with the [REDACTED] number was in and around the U.S. Capitol Building between 12:00 p.m. and 9:15 p.m. on January 6, 2021.

The screengrab provided by the tipster shows one post from “Karla Adams” that contained three videos and additional photos from the U.S. Capitol on January 6, 2021. The Facebook profile account name “Dustin Adams,” believed to be used by D. ADAMS based on the name and profile photo, is tagged in the post. The post, depicted below, has since been removed.



The screen recording captures each of the three videos. In the first video, the individual filming, who I believe is K. ADAMS, is located on the Upper West Terrace of the U.S. Capitol on January 6, 2021. The individual filming can be heard telling someone nearby: “we’re safe right now . . . it’s gonna get nuts, I’m telling you.” A screenshot of the video is depicted here:



The second video captured by the screengrab is the same video of the crowd walking towards the Crypt initially sent to the FBI via the tipline and discussed above.

In the third video, the individual filming, who I believe is K. ADAMS, is on the Upper West Terrace and appears to be nearing the Senate Wing Door. As she walks, the individual filming can be heard shouting: “Mike Pence is supposed to have the President’s back . . . the people are not gonna fucking take it . . . inside this building is all the traitors in the United States who tried to sell the people to the CCP¹ . . . fucking traitors!” A screenshot of the video can be seen here:

¹ “CCP” is an acronym that stands for the Chinese Communist Party.



Further review of the records received from Facebook show the following:

1. K. ADAMS marked herself as “attending” an event advertised on Facebook titled “Hillsdale County Republican Party Charter to DC.” The event was started on January 5, 2021 at 11:00 p.m. and ended on January 7, 2021 at 1:00 p.m.
2. On January 4, 2021, K. ADAMS posted: “what are we doing in d.c.? arresting people.”
3. On January 5, 2021, K. ADAMS posted the following message: “Dustin and I will be going to D.C. Please keep US in your prayers..The Hillsdale Republican Party will show up!! Politicians who got paid and don’t work we will replace everyone of ya!!!”
4. On January 6, 2021, D. ADAMS sent K. ADAMS a photo of the two of them with the Washington Monument in the background. In the photo, depicted below, D. ADAMS (left) is wearing a brown-hooded jacket, a green “Trump 2020” hat, and

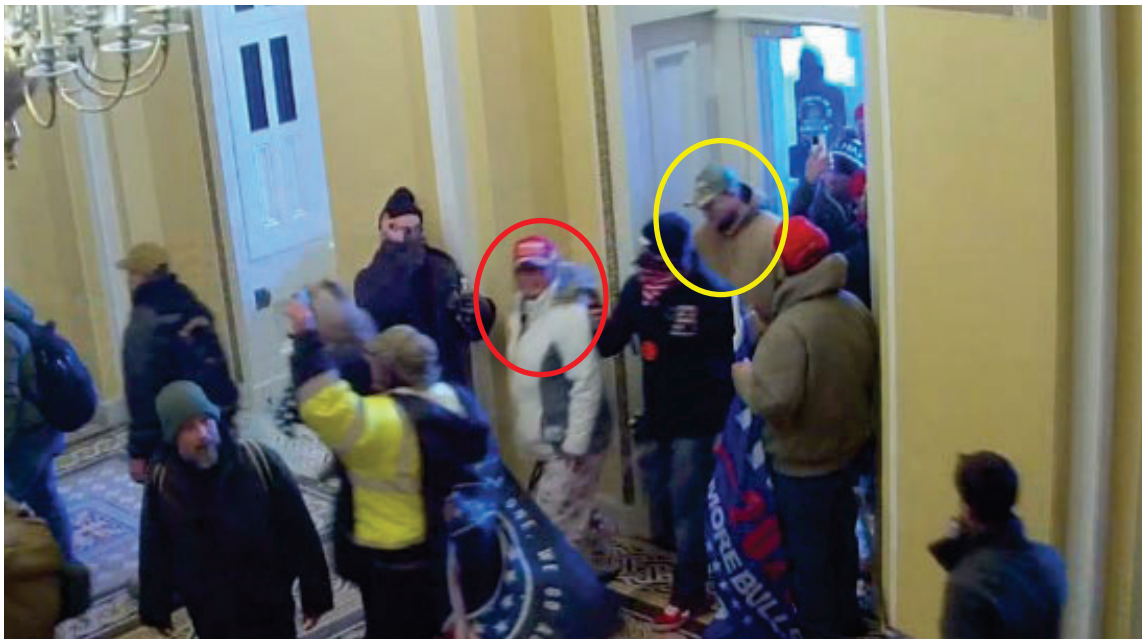
glasses. K. ADAMS (right) is wearing a white jacket with a fur-like lined hood, black-rimmed glasses, and a red “TRUMP MAKE AMERICA GREAT!” hat.



FBI agents separately interviewed three witnesses familiar with K. ADAMS and D. ADAMS. All three witnesses identified K. ADAMS and D. ADAMS in the photo above that depicts the two of them in front of the Washington Monument on January 6, 2021.

Using the Washington monument photo and the K. ADAMS’s Facebook videos as a reference, law enforcement reviewed open-source footage and closed-circuit television (“CCV”) footage from inside U.S. Capitol to locate K. ADAMS and D. ADAMS.

CCV footage shows that at approximately 2:21 p.m., K. ADAMS and D. ADAMS entered the U.S. Capitol through the Senate Wing Door. In the photos below, K. ADAMS is circled in red, and D. ADAMS is circled in yellow.



At approximately 2:24 p.m., K. ADAMS and D. ADAMS can be seen inside of the Crypt:



K. ADAMS and D. ADAMS turned around and retraced their steps back to the Senate Wing:



At approximately 2:27 p.m., K. ADAMS and D. ADAMS exited the Capitol Building through the Senate Wing Doors:




Conclusion

Based on the foregoing, your affiant submits that there is probable cause to believe that KARLA ADAMS and DUSTIN ADAMS 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 attempt or conspire 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 KARLA ADAMS and DUSTIN ADAMS 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.



Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 8th day of September, 2023.

 Zia M. Faruqui
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ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE