

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
Michael Bradley
DOB: XXXXXX

Case No. 23-mj-237
Assigned To: Magistrate Judge Zia M. Faruqui
Date Assigned: 8/31//2023
Description: Complaint with Arrest Warrant

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of in the
in the District of Columbia, the defendant(s) violated:

Code Section

Offense Description

- 18 U.S.C. § 111(a)(1) - Assaulting, Resisting, or Impeding Certain Officers,
18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority,
18 U.S.C. § 1752(a)(2) - Disorderly and Disruptive Conduct in a Restricted Building or Grounds,
18 U.S.C. § 1752(a)(4) - Engaging in Physical Violence in a Restricted Building or Grounds,
40 U.S.C. § 5104(e)(2)(D) - Disorderly Conduct in a Capitol Building,
40 U.S.C. § 5104(e)(2)(F) - Act of Physical Violence in the Capitol Grounds or Buildings;
18 U.S.C. 231(a)(3) - Civil Disorder.

This criminal complaint is based on these facts:

See attached statement of facts.

Continued on the attached sheet.

[Redacted signature area]

Complainant's signature

[Redacted name and title area]

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone.

Date: 08/31/2023

Zia M. Faruqui
[Signature]

Judge's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge

Printed name and title

STATEMENT OF FACTS

Your affiant, [REDACTED], is a Special Agent of the Federal Bureau of Investigation (FBI) assigned to the Atlanta Division. In my duties as a Special Agent, I investigate international and domestic terrorism offenses. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As an FBI 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.

The Attack at the U.S. Capitol on 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.

Michael BRADLEY's Involvement in the January 6, 2021, Capitol Riot

Soon after January 6, 2021, the FBI started to investigate an unidentified male wearing a camouflage baseball cap, camouflage quilted jacket, and a pair of blue jeans, with a baton in a holster on his right hip.

According to video footage taken by individuals in the crowd and closed-caption TV (CCTV) footage, between 4:00 p.m. and 4:30 p.m., the man --subsequently identified as Michael BRADLEY, as discussed in more detail below-- walked towards the U.S. Capitol and moved towards a tunnel on the Lower West Terrace, where law enforcement officers were amassed ("Tunnel").



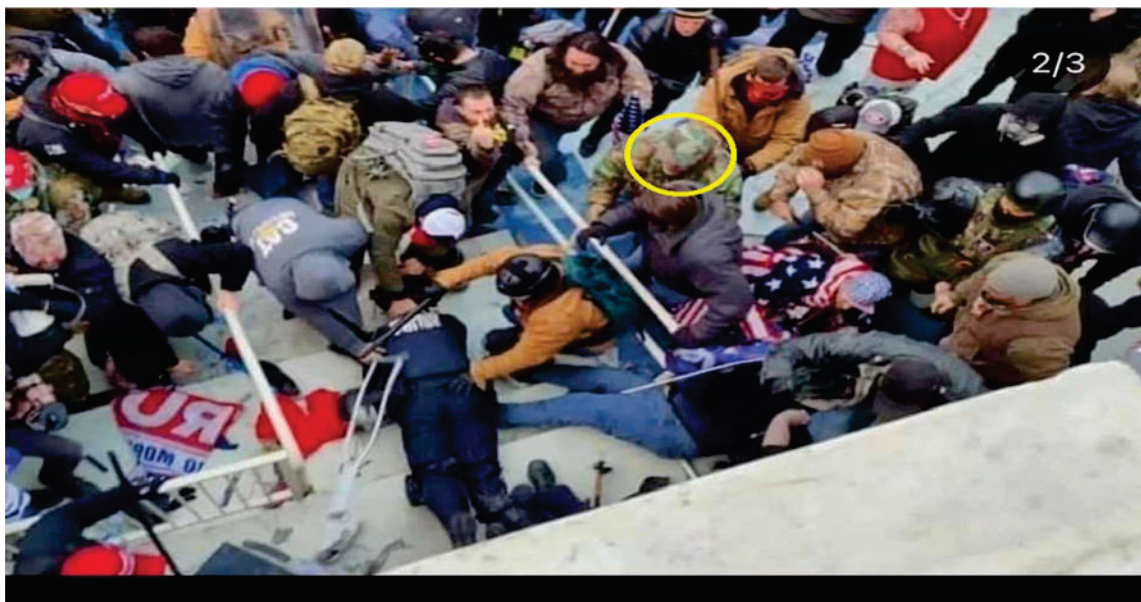
BRADLEY, circled in yellow, walking towards the U.S. Capitol

BRADLEY approached the U.S. Capitol building from the west side. As BRADLEY walked with other protesters to the U.S. Capitol, he passed the fencing and barricades that showed that the Capitol grounds were restricted and ascended the building's steps to the Lower West Terrace, right below the U.S. Capitol Building:



BRADLEY, circled in yellow, at the Lower West Terrace

BRADLEY then made his way to the mouth of the Tunnel on the Lower West Terrace. Once arrived at the Tunnel entrance, CCTV and third-party video footage captures BRADLEY (circled in yellow below) watching as others in the crowd beat an MPD officer with their hands, a baton, a crutch and a flagpole right in front of the Tunnel a little before 4:30 p.m.:

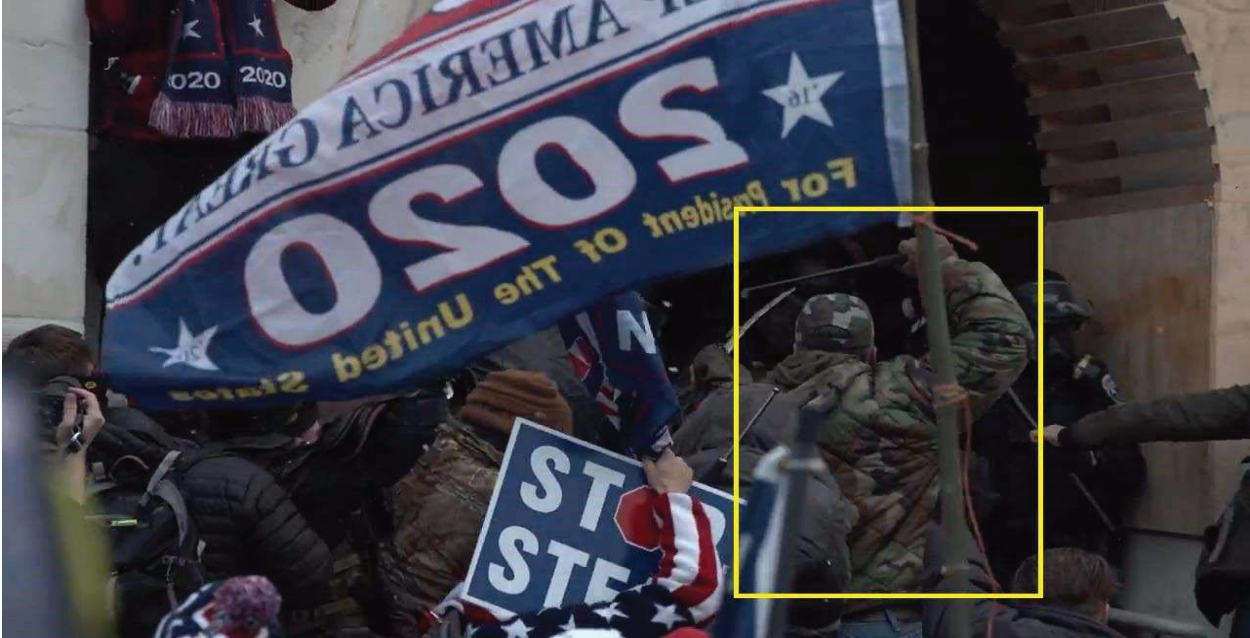


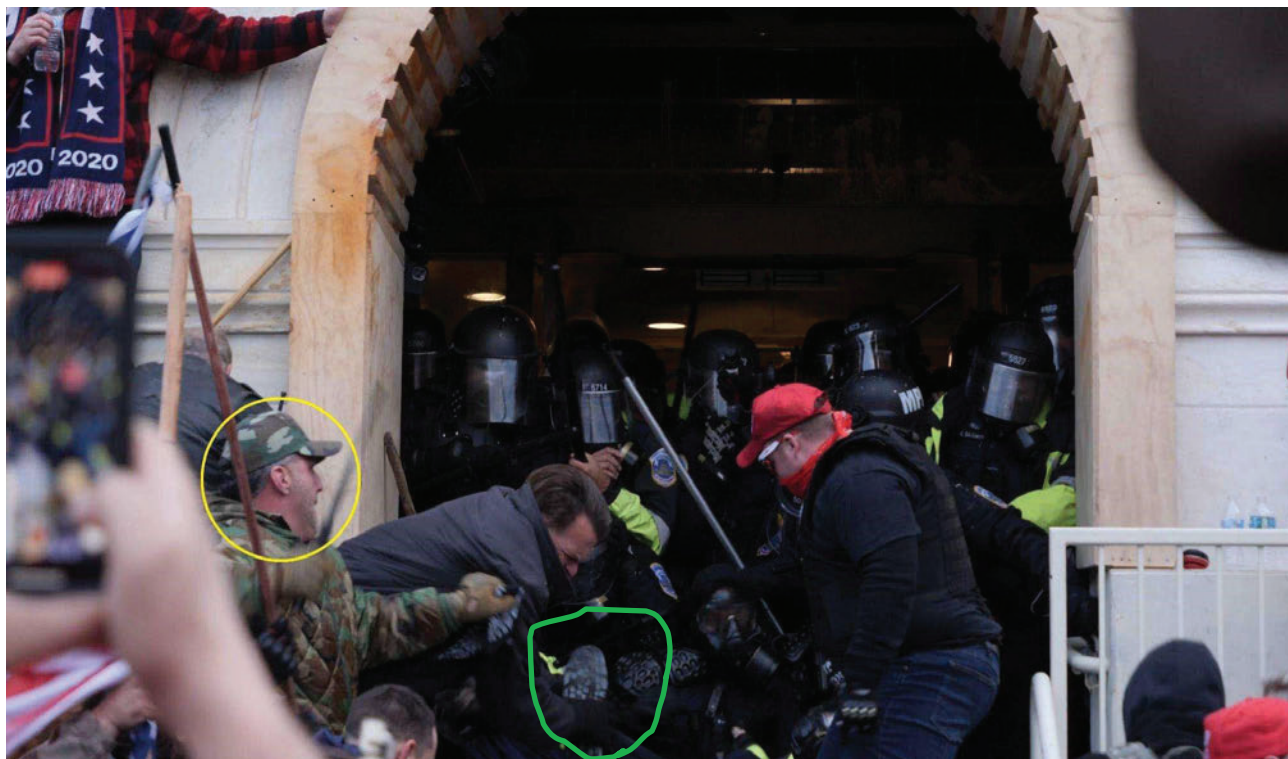
BRADLEY was not just a bystander; he was also an assailant. BRADLEY approached the Tunnel two times over a two-minute period of time from approximately 4:27 p.m. EST to 4:28

p.m. EST on January 6, 2021, with the intent of assaulting officers with his baton each time he approached the mouth of the Tunnel.

The initial assault occurred at approximately 4:27:30 p.m., and is reflected from different vantage points in the screenshots below. BRADLEY raised his baton, approaching the officers in the Tunnel in an apparent threat to strike them. However, BRADLEY was sprayed with a chemical agent, which appears to have caused him to temporarily retreat from the mouth of the Tunnel. BRADLEY (yellow squares) is captured in still images at approximately 4:27:30 p.m.:







As depicted in the picture above, BRADLEY was attempting to hit officers with his baton at around 4:27:30 p.m., while other rioters pulled another MPD officer down the stairs in front of the Tunnel. In the above screenshot, the sole of the MPD officer's shoe can be seen below BRADLEY's left hand (circled in green).

As BRADLEY approached the line of officers with his baton arm raised, an officer sprayed the crowd from the mouth of the Tunnel, and BRADLEY retreated without swinging the baton at officers.

At approximately 4:28:30 p.m., CCTV and third-party video capture BRADLEY as he returned to the mouth of the Tunnel. This time, he swung at the officers in the Tunnel with his baton, in an apparent attempt to hit them. The images below capture BRADLEY as he approached and swung his baton at the D.C. Metropolitan Police Department (MPD) Officers who were in the Tunnel at the time:



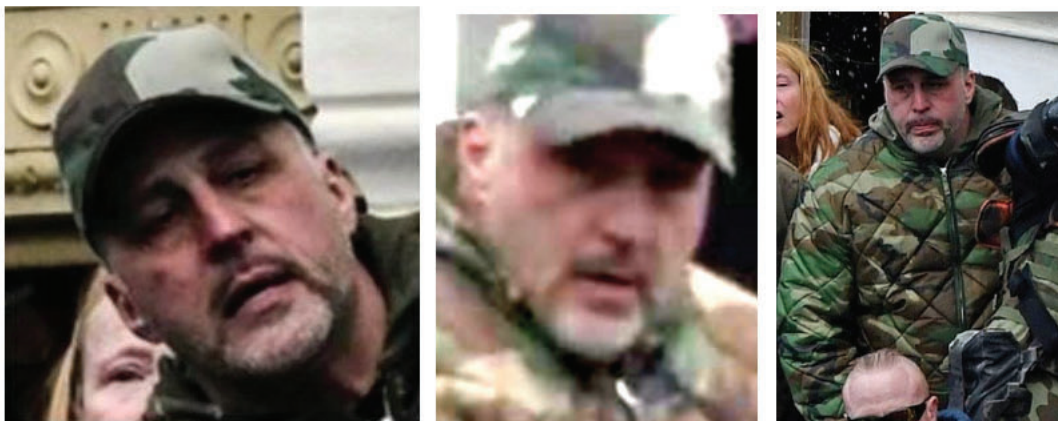


After swinging at the officers at least two times, BRADLEY moved to the side of the Tunnel:



Identifying Michael BRADLEY as BOLO 154-AFO a/k/a #CommanderCamo

In the days after January 6, 2021, the FBI and others issued a poster and internet post in search of BOLO 154-AFO, a/k/a #CommanderCamo in an attempt to identify the man involved in the above-depicted assaults. Below are the photos of BOLO 154-AFO from [fbi.gov/wanted/capitol-violence](https://www.fbi.gov/wanted/capitol-violence):



On January 7, 2022, about a year after the notice had been posted on the FBI's and others' websites, an anonymous tipster submitted an online tip to the FBI's National Threat Operations Center, regarding two individuals bragging about being involved with the Capitol Riot events. The tipster stated that they overheard two people talking about how they were at the Capitol on January 6, 2021, and about assaulting police officers on that day. The tipster identified the two people, one was Michael BRADLEY of Locusts Grove, Georgia, and the second was BRADLEY's friend and neighbor, Witness 1.

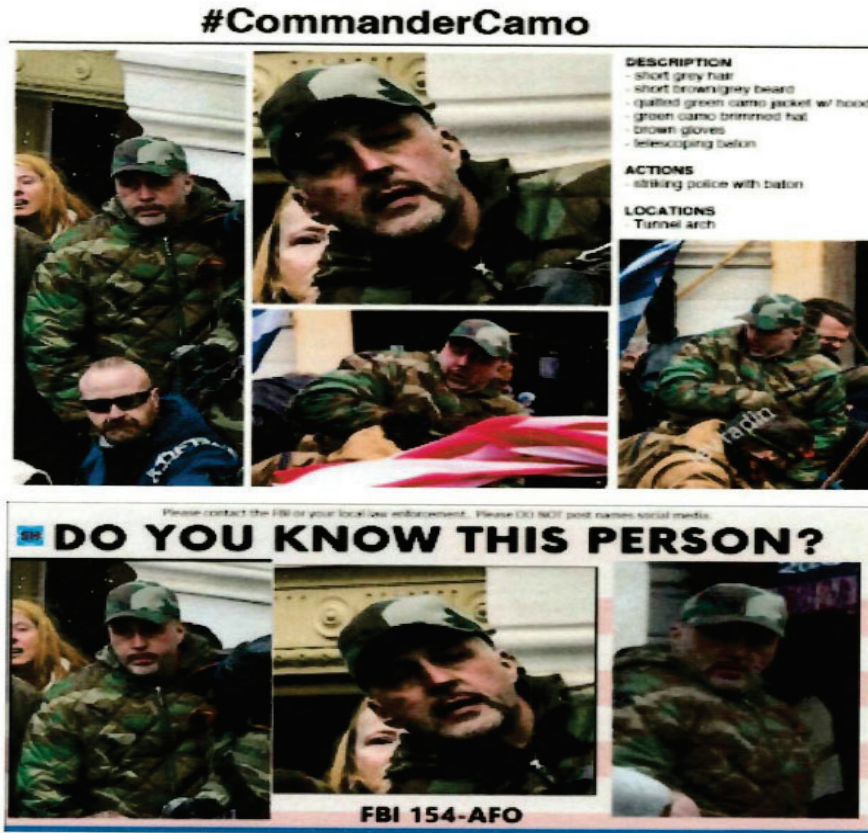
Agent observations between comparisons of images collected from the Capitol on January 6, 2021, of BOLO 154-AFO, a/k/a #CommanderCamo and Michael BRADLEY's Georgia driver's license photograph revealed multiple similarities including hair color, nose, jawline, ear position, eye shape, and a discoloration/blemish on BRADLEY'S right cheek.

In August 2023, agents sought and received returns from a Facebook search warrant for Witness 1's Facebook account. The returns included a picture of BRADLEY and Witness 1 taken and posted on January 5, 2021, with the caption, "D.C. bound. Over the hill soldiers."



Of note, BRADLEY appears to be wearing the same camouflage baseball hat that he wore the next day to the U.S. Capitol.

On August 10, 2023, your affiant interviewed a witness (Witness 2) who lives in Georgia, in the same general area as BRADLEY. BRADLEY lives in a rural, sparsely-populated part of Georgia. Witness 2 has frequent interactions with BRADLEY and was shown the flyer below and asked whether she/he recognized this person:



Witness 2 positively identified Michael BRADLEY as the individual in the flyer. Witness 2 also provided additional accurate information concerning BRADLEY’s family.

Based on the foregoing, your affiant submits that there is probable cause to believe that BRADLEY violated 18 U.S.C. § 111(a)(1), which makes it a crime to assault, resist, oppose, impede, intimidate, or interfere with a federal law enforcement officer, as designated in Section 1114 of Title 18, while engaged in or on account of the performance of his or her official duties. Section 1114 specifically identified United States Capitol Police (“USCP”) Officers as federal law enforcement officers. The definition under Section 1114 is further extended to include any person assisting such a federal officer or employee in the performance of his or her official duties or on account of that assistance. USCP Officers are federal law enforcement officers and MPD Officers were assisting USCP Officers in protecting the Capitol and members of Congress on January 6, 2021. The officers located in that part of the Tunnel at 4:27 and 4:28 p.m. were MPD officers.

You affiant further submits that there is probable cause to believe that BRADLEY violated 18 U.S.C. § 1752(a)(1), (2) and (4), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; (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; and (4) knowingly engage in any act of physical violence against any person or property in any restricted building or grounds; 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 BRADLEY violated 40 U.S.C. § 5104(e)(2)(D) and (F), 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 on 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 (F) engage in an act of physical violence on the grounds or in any of the Capitol Buildings.

Finally, your affiant submits there is probable cause to believe that BRADLEY violated 18 U.S.C. 231(a)(3), which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of Section 231 of Title 18, a federally protected function means any function, operation, or action carried out, under the laws of the United States, by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Joint Session of Congress where the Senate and House count Electoral College votes.



FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 31st day of August 2023.

  Zia M.
Faruqui

ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE