

AB:TBM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

ISAAC STEVE STURGEON,

Defendant.

AFFIDAVIT IN SUPPORT OF  
REMOVAL TO THE  
DISTRICT OF COLUMBIA

(Fed R. Crim. P. 5)

Case No. 21-M-286

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EASTERN DISTRICT OF NEW YORK, SS:

, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation (“FBI”), currently assigned to investigate the events at the Capitol Building and grounds on January 6, 2021, duly appointed according to law and acting as such.

On or about February 5, 2021, the United States District Court for the District of Columbia issued an arrest warrant commanding the arrest of ISAAC STEVE STURGEON on an Indictment charging him with violations of Title 18, United States Code, Sections 1512(c)(2) and 2 (obstruction of justice and aiding and abetting the same), 111(a)(1) (assaulting, resisting or impeding certain officers), 231(a)(3) (civil disorder), 1752(a)(1) (entering and remaining in a restricted building or grounds), 1752(a)(2) (disorderly and disruptive conduct in a restricted building or grounds), and 1752(a)(4) (engaging in physical violence in a restricted building or grounds), as well as 40 U.S.C. §§ 5104(e)(2)(E) (impeding

passage through the Capitol grounds or buildings) and 5104(e)(2)(F) (act of physical violence in the Capitol grounds or buildings).

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

1. On or about February 5, 2021, the United States District Court for the District of Columbia issued an arrest warrant commanding the arrest of ISAAC STEVE STURGEON on an Indictment charging him with violations of Title 18, United States Code, Sections 1512(c)(2) and 2 (obstruction of justice and aiding and abetting the same), 111(a)(1) (assaulting, resisting or impeding certain officers), 231(a)(3) (civil disorder), 1752(a)(1) (entering and remaining in a restricted building or grounds), 1752(a)(2) (disorderly and disruptive conduct in a restricted building or grounds), and 1752(a)(4) (engaging in physical violence in a restricted building or grounds), as well as 40 U.S.C. §§ 5104(e)(2)(E) (impeding passage through the Capitol grounds or buildings) and 5104(e)(2)(F) (act of physical violence in the Capitol grounds or buildings). The arrest warrant and Indictment are attached hereto as Exhibits A and B, respectively.

2. As captured on D.C. Metropolitan Police Department ("MPD") Body Worn Camera ("BWC"), on January 6, 2021, STURGEON was on the grounds of the United States Capitol Building wearing a green jacket, green scarf, grey knit hat and dark backpack. Among other things, STURGEON and a group of others picked up a metal police barricade

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<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause for removal, I have not described all of the relevant facts and circumstances of which I am aware. I am familiar with the facts and circumstances set forth herein from my own participation in the investigation, my review of the investigative file, and from my conversations with, and review of reports of, other law enforcement officers and agents.

and shoved the barricade into MPD officers. On January 16, 2021, the FBI posted to its website a photograph of STURGEON, among others, seeking the public's assistance in identifying him.

3. Through tips and open source searches, law enforcement identified several social media accounts associated with STURGEON, including an Instagram account with several pictures and comments describing the events at the Capitol on January 6, 2021. One of the photos posted on or about January 6, 2021 showed STURGEON among other protesters at the Capitol grounds, wearing the same outfit captured on the BWC footage.

4. Moreover, two individuals informed the FBI that they knew STURGEON. They provided STURGEON's contact information and identified him as the person in still images from the BWC. One of these individuals also identified STURGEON in photos from the above-described Instagram account. S/he stated that STURGEON traveled frequently and had access to numerous weapons. A Facebook account associated with STURGEON contains a photo, posted on or about November 28, 2020, showing STURGOEN carrying what appears to be a rifle.

5. Searches in public and law enforcement databases confirmed STURGEON's contact information. They also yielded a Department of Motor Vehicles ("DMV") profile for STUGEON. Law enforcement compared the DMV profile photo for STURGEON to the BWC footage and various social media accounts associated with STURGEON, and concluded that the footage and photos were of the same person.

6. On January 24, 2021, STURGEON traveled to Kenya, Africa. Thereafter, he purchased a return ticket to the United States departing on April 5, 2021. However, Kenyan authorities ordered STURGEON deported in advance of his return date. On

March 5, 2021, STURGEON flew to John F. Kennedy International Airport aboard Delta Flights 9522 and 49, and arrived on March 6, 2021 at approximately 12:45 p.m. He was arrested at the airport.

7. At the time of his arrest, STURGEON had on his person a U.S. passport bearing the name “Isaac Steve Sturgeon,” with a birth date and photo matching the STURGEON wanted in the District of Columbia.

8. Based on the foregoing, I submit that there is probable cause to believe that the defendant ISAAC STEVE STURGEON is the Isaac Steve Sturgeon wanted in the District of Columbia.

WHEREFORE, your deponent respectfully requests that the defendant ISAAC STEVE STURGEON be removed to the District of Columbia so that he may be dealt with according to law.

[REDACTED]

[REDACTED]

Special Agent  
Federal Bureau of Investigation

Sworn to before me by telephone this  
\_\_\_ day of March, 2021

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THE HONORABLE CHERYL L. POLLAK  
CHIEF UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK