

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.

Jody Lynn Tagaris
DOB: XXXXXX

)
) Case: 1:21-mj-00426
) Assigned to: Judge Faruqui, Zia M.
) Assign Date: 5/14/2021
) Description: COMPLAINT W/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. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds
Without Lawful Authority,
40 U.S.C. § 5104(e)(2) - Violent Entry and Disorderly Conduct on Capitol Grounds.

This criminal complaint is based on these facts:

See attached statement of facts.

Continued on the attached sheet.

[Redacted Signature]

Complainant's signature

[Redacted Name]

Special Agent

Printed name and title

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

Date: 05/14/2021

[Seal and Signature]

2021.05.14

17:29:22 -04'00'

Judge's signature

City and state: Washington, D.C.

Zia Faruqui, U.S. Magistrate Judge

Printed name and title

STATEMENT OF FACTS

Your affiant, [REDACTED] is a Special Agent assigned to the Federal Bureau of Investigation (FBI). In my duties as a special agent, I am assigned to the FBI's Miami Field Office, West Palm Beach Resident Agency. I am currently assigned to the Joint Terrorism Task Force. 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, detention, 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, shortly 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.

On or about January 14, 2021, the FBI received information that Defendant Jody Lynn Tagaris posted a Facebook post, using username “Jody Echevarria-Tagaris”, indicating that she entered the U.S. Capitol. The photo depicts a woman wearing a red Make America Great Again hat, an American Flag scarf, blue jeans, and a unique U.S. Olympics American flag jacket while masked posing in a frame of a broken window next to the Senate Wing Door at the US Capital with the caption, “The Capital. . .back at hotel safe! Got tear gassed but okay!”.



The FBI identified a co-worker of Tagaris, who requested their identity be protected. This co-worker advised the Facebook account belonged to Tagaris and that it was Tagaris in the photo. The co-worker also advised Tagaris is known at work as Jody Echevarria-Tagaris. In addition to the information provided by Tagaris’s co-worker, the FBI received information that an anonymous tipster provided the same photo to the Washington Metropolitan Police Department and identified

the masked woman in the picture as Tagaris. In conjunction with the masked photo, the tipster also provided another Facebook photo of Tagaris wearing the same American flag jacket while showing her face uncovered. The tipster identified the person in the photos as Jody (Tagaris) and identified where Tagaris was employed.



The FBI obtained a search warrant to search the aforementioned Facebook account. A review of the account reveals an unmasked photo of Tagaris, posted on January 6, 2021, wearing the same jacket, scarf, blue jeans, and hat that she was seen wearing at the U.S. Capitol. The FBI also found statements in the Facebook account made by Tagaris that she was traveling to Washington, D.C. on or about January 5, on a 6:00 p.m. flight to attend President Trump's rally and that she would be making posts to let everyone know that she was ok. Tagaris also made a post on January 6, 2021 about arriving safely and staying at the Holiday Inn Washington Capitol - National Mall.



Time 2021-01-05 03:45:54 UTC
Type Comments
Summary Jody Echevarria-Tagaris replied to a comment. '@[537964554:2048:Patricia Jackson] hoping they don't cancel flights and hotel reservations. I'll post along the way starting getting on the flight at 6pm tomorrow![]
Object Id S:_1547390089:10224211099128222:69

Time 2021-01-05 03:30:01 UTC
Type Photos
Summary My Trump hat for 1/6 rally in DC[]
Object Id S:_1547390089:10224192893360519

Time 2021-01-08 23:23:19 UTC
Type Comments
Summary Jody Echevarria-Tagaris commented. 'On Parler, went to DC. I saw for myse!! You are right on! jody from Stuart, Fl'
Object Id S:_1547390089:10224200373307513:69

Time 2021-01-05 22:15:51 UTC
Story Jody Echevarria-Tagaris was traveling to Washington D.C. from Palm Beach International Airport (PBI),
Message [][] Off I Go [][] Trump 2020 [][]

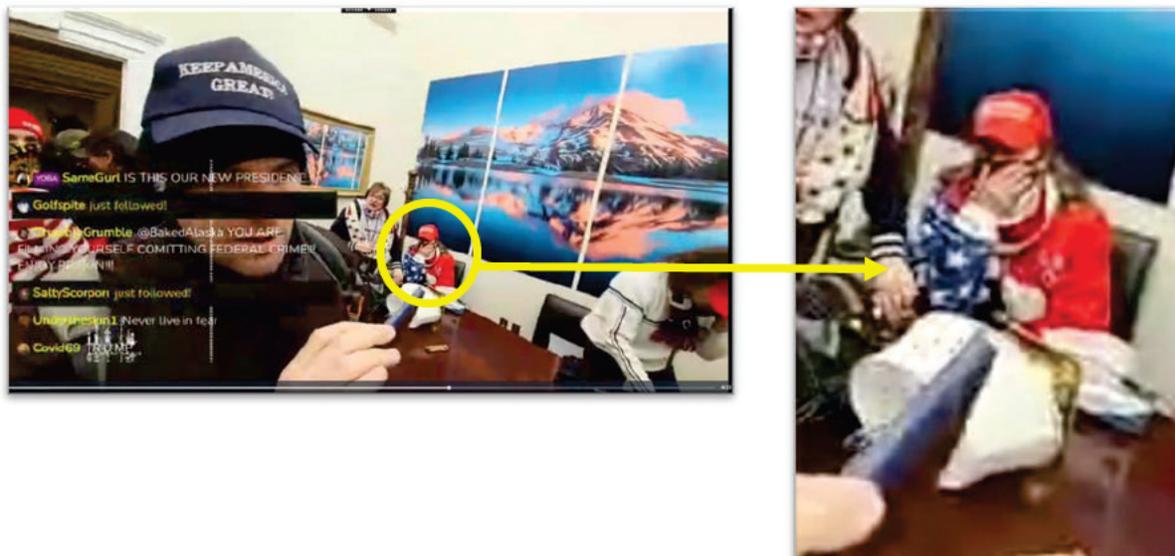
Time 2021-01-05 23:02:06 UTC
Message Glad everyone stayed 6' apart at the airport! What a scam we are dealing with!!

Time 2021-01-06 01:14:28 UTC
Message Sky is on fire!

Time 2021-01-06 02:21:05 UTC
Story Jody Echevarria-Tagaris is at Holiday Inn Washington Capitol-National Mall.
Message Arrived safely! The plane was full, not one seat. So many Patriots[]

The FBI also obtained U.S. Capitol surveillance video evidence from the U.S. Capitol on the day in question. The surveillance video shows the woman in the American flag jacket enter the U.S. Capitol through a broken window near the Senate Wing Door. The woman remained in the Senate Wing Door lobby area for a period of time where she took pictures and engaged with U.S. Capitol Police Officers. The woman in the American flag jacket lowered her mask, displaying a face that matches Targaris. Tagaris eventually heads down a hallway and goes left into Senate Breakout Room S139. The FBI obtained video footage from a third party which captures Tagaris in Senate Breakout Room S139. In this room, Tagaris is captured walking around and sitting at a conference table. Tagaris remains in the breakout room until Washington Metropolitan Police arrive at the location where people are forced to vacate the Capitol. At this time, U.S. Capitol surveillance video shows Tagaris exit the breakout room and eventually exit through the Senate Wing Door.





Tagaris is also captured by a Washington Metropolitan Police Officer's body camera after she was expelled from the U.S. Capitol. Tagaris is seen in the video wearing the same unique U.S. Olympics American Flag jacket and Make America Great Again red hat that was worn by the Defendant while inside the U.S. Capitol.



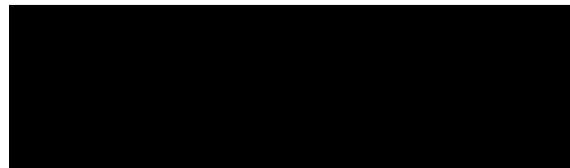
During the course of its investigation, the FBI identified Verizon mobile phone number 561-722-xxxx as being used by Tagaris. In her Facebook account details, Tagaris lists 561-722-xxxx as her phone number. In addition, the undersigned left a voicemail for Jody Tagaris by calling the 561-722-xxxx on or about February 17, 2021, asking Jody Tagaris to please return the

undersigned's call. On or about February 18, 2021, a woman returned the undersigned's phone call and identified herself as Jody Tagaris.

The FBI obtained a search warrant for subscriber and cell-site location data for Verizon phone number 561-722-xxxx for the date range November 3, 2020-March 23, 2021. The search warrant results reveal that Tagaris is the listed subscriber for phone number 561-722-xxxx and has been since September 19, 2017. A review of the cell-site location data for January 6, 2021 reveals that the phone was located in multiple locations that is consistent with Tagaris being present in and around the U.S. Capitol.

Based on the foregoing, your affiant submits that there is probable cause to believe that Jody Lynn Tagaris 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 function 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 Jody Lynn Tagaris violated 40 U.S.C. § 5104(e)(2)(C) and (D), which makes it a crime to willfully and knowingly: (C) with the intent to disrupt the orderly conduct of official business, enter or remain in a room in any of the Capitol Buildings set aside or designated for the use of— (i) either House of Congress or a Member, committee, officer, or employee of Congress, or either House of Congress; and (D) 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.



Federal Bureau of Investigation (FBI)

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone, this __14th__ day of May 2021.



2021.05.14

17:28:24 -04'00'

ZIA FARUQUI
U.S. MAGISTRATE JUDGE