

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
Paul Lee Seymour, Jr., (DOB: XXXXXXXXXX)
Paul Lee Seymour, Sr., (DOB: XXXXXXXXXX)

)
) Case: 1:21-mj-00679
) Assigned To : Harvey, G. Michael
) Assign. Date : 12/3/2021
) 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,
18 U.S.C. § 1752(a)(2) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority,
40 U.S.C. § 5104(e)(2)(D) - Violent Entry and Disorderly Conduct on Capitol Grounds,
40 U.S.C. § 5104(e)(2)(G) - 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.



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

Date: 12/03/2021

City and state: Washington, D.C.

Digitally signed by G. Michael Harvey
Date: 2021.12.03 16:39:25 -05'00'

Judge's signature

G. Michael Harvey, U.S. Magistrate Judge
Printed name and title

## STATEMENT OF FACTS

Your affiant, [REDACTED], is a Task Force Officer assigned to the Federal Bureau of Investigation ("FBI"), Cincinnati Field Office, Joint Terrorism Task Force. Currently, I am tasked with investigating criminal activity in and around the U.S. Capitol grounds on January 6, 2021. As a Task Force Officer, 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 U.S. 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 U.S. 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 January 8, 2021, an anonymous complainant, Complainant #1, contacted the FBI Internet Tip Line reporting that B.M, along with her boyfriend, PAUL LEE SEYMOUR, JR. (“SEYMOUR JR”) attended the “protest” at the U.S. Capitol on January 6, 2021. Complainant #1 reported that SEYMOUR JR sent B.M. a video recording of himself inside the Capitol Building destroying property, stealing items, and violating curfew restrictions. Complainant #1 stated that B.M. uploaded this video to her Facebook account; the videos have since been deleted and were not able to be retrieved by your affiant. Your affiant and FBI Task Force Officer Ron Willison contacted B.M.’s employer, who verified that B.M. was at work in Cincinnati, Ohio on January 6, 2021, thus she is not considered a suspect in this case and, for this reason, she is identified by her initials.

On January 13, 2021, a second complainant, Complainant #2 submitted images 1-4 to the FBI via the FBI’s US Capitol Complaint Portal. Complainant #2 stated their belief that the photos show SEYMOUR JR, along with others, inside the Capitol Building during the breach of the Capitol on January 6, 2021. Complainant #2 included a caption on a photo which read, “This is to help identify one of the domestic terrorist who attacked the capital. His name is Paul Lee Seymour. He lives in Hamilton Ohio.”

Image 1.



Image 2.



Image 3.



Image 4.



On January 21, 2021, the FBI engaged in investigative measures to compare the photographs obtained from Complainant #2 and photographs and video obtained from multiple sources and tips, including video captured by the U.S. Capitol Police on January 6, 2021.

On January 22, 2021, the FBI's investigation revealed additional images of SEYMOUR JR and his father, PAUL LEE SEYMOUR, SR. ("SEYMOUR SR"), (collectively, "the SEYMOURS"), exiting the U.S. Capitol Building via the Chestnut-Gibson Memorial Doors on January 6, 2021. Images 5-8. SEYMOUR JR appears in Images 5-7, while SEYMOUR SR, wearing a dark-colored jacket, jeans and knit ski-type cap, appears in Images 7 and 8.

Image 5.



Image 6.



Image 7.



Image 8.



The FBI was able to obtain video captured by the U.S. Capitol Police on January 6, 2021, of SEYMOUR JR exiting the Memorial Doors at approximately 3:33 p.m. as shown in Image 9.

Image 9.



After exiting through the Memorial Doors on the East side of the U.S. Capitol Building at approximately 3:33 p.m., SEYMOUR JR made his way around the building to the Upper Terrace on the West side of the building by approximately 4:35 p.m., as captured in Image 10.

Image 10.



The FBI's investigation revealed Image 11, which captured the SEYMOURS in the Crypt inside the U.S. Capitol Building on January 6, 2021.

Image 11.



The FBI investigation also uncovered an image of SEYMOUR JR outside the U.S. Capitol Building during the evening of January 6, 2021, in front of a line of law enforcement officers. Image 12.

Image 12.



On February 11, 2021, your affiant identified information that a phone number ending in [REDACTED], that belongs to SEYMOUR SR, was inside the U.S. Capitol Building on January 6, 2021. The first connection time for this number was at 1440 hrs. EST and the latest disconnect time was 1632 hrs. EST. No phone numbers associated with SEYMOUR JR were identified as being inside the U.S. Capitol Building on that date.

On June 2, 2021, FBI Task Force Officer [REDACTED] and FBI Special Agent [REDACTED] engaged in a non-custodial interview of SEYMOUR SR at his place of employment. SEYMOUR SR was read his Miranda warnings and was presented with a written copy of the Miranda waiver which he willingly and voluntarily signed prior to being asked any questions. Afterward, SEYMOUR SR admitted to entering the U.S. Capitol Building on January 6, 2021, with his son SEYMOUR JR. SEYMOUR SR stated that he and his son entered through an open side entry door and also exited the Capitol through that same doorway after being told to leave the area by police officers. While exiting through that doorway, SEYMOUR SR noticed another set of open doors and followed the crowd into the Capitol again. Once inside the Capitol Building, SEYMOUR SR stated that he and his son entered a room with multiple statues in it. [Image 11 shows the SEYMOURS inside the Crypt of the Capitol Building.] SEYMOUR SR indicated that he believed they were inside the Capitol Building for approximately nine minutes before additional police officers arrived and escorted everyone out of the building. While at the Capitol, SEYMOUR SR stated that he witnessed individuals breaking exterior windows. After leaving the Capitol, SEYMOUR SR stated he and his son took additional photos outside the building before they

proceeded to their vehicle. [Image 12 shows a nighttime photo of SEYMOUR JR outside the Capitol.]

On June 2, 2021 your affiant also engaged in a non-custodial interview of SEYMOUR JR at his residence. SEYMOUR JR was read his Miranda warnings and was presented with a written copy of the Miranda waiver which he willingly and voluntarily signed prior to being asked any questions. Afterward, SEYMOUR JR admitted to entering the U.S. Capitol Building on January 6, 2021, with his father, SEYMOUR SR. SEYMOUR JR stated that, prior to entering the Capitol Building, he saw a woman that he did not believe to be a “worker” open a “side door” to the Capitol Building and people began to gain entry to the Capitol through that door. A short time later, people were ushered back out the Capitol through that door. At the same time, SEYMOUR JR noticed that pepper spray had been deployed and the SEYMOURS prepared to leave the “courtyard,” but SEYMOUR JR noticed that two doors, approximately 40 feet in front of him, had opened. The SEYMOURS entered the Capitol through these open doors, walking past law enforcement officers who lined the hallway. SEYMOUR JR claimed these officers did not make any attempt, verbally or physically, to prevent entry to the building, instead they said, “have a good day” and “hey, how are you.” Inside the Capitol, SEYMOUR JR stated that he and his father, SEYMOUR SR, walked down a hallway lined with statues, which appears to be the National Statuary Hall. SEYMOUR JR stated that he and SEYMOUR SR also walked past a room labeled “Oregon Room,” before entering into a “museum room” where they spent approximately one hour before being asked to leave by law enforcement.

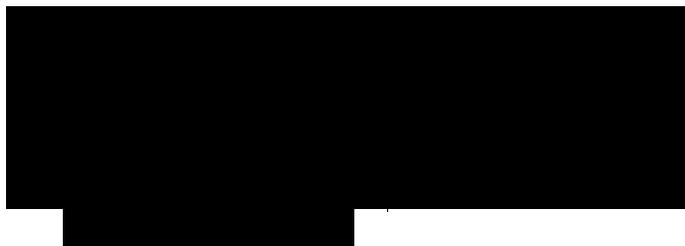
SEYMOUR JR was shown Images 1-8 and he identified himself and SEYMOUR SR in the appropriate photos.

A search warrant was executed at the time of the interview of SEYMOUR JR and your affiant located the black overalls and flag that SEYMOUR JR wore at the U.S. Capitol on January 6, 2021. Your affiant also seized SEYMOUR JR’s cell phone which contains photographs that SEYMOUR JR took while inside the U.S. Capitol Building on January 6, 2021.

Based on the foregoing, your affiant submits that there is probable cause to believe that PAUL LEE SEYMOUR, SR. and PAUL LEE SEYMOUR, JR. 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 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 PAUL LEE SEYMOUR, SR. and PAUL LEE SEYMOUR, JR. violated 40 U.S.C. § 5104(e)(2), 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 3<sup>rd</sup> day of December, 2021.

A handwritten signature in black ink, appearing to read "G. Michael Harvey".

Digitally signed by  
G. Michael Harvey  
Date: 2021.12.03  
16:41:18 -05'00'

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G. MICHAEL HARVEY  
U.S. MAGISTRATE JUDGE