

STATEMENT OF FACTS

Your affiant, [REDACTED] is a Special Agent with the Federal Bureau of Investigation (FBI). 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. Currently, I am tasked with investigating criminal activity in and around the United States Capitol Building and grounds on January 6, 2021.

The United States Capitol is secured twenty-four hours a day by United States Capitol Police (USCP). Restrictions around the Capitol include permanent and temporary security barriers and posts manned by USCP. Only authorized people with appropriate identification are allowed access inside the Capitol. On January 6, 2021, the exterior plaza of the Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the 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 Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on Tuesday, 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 Pence present and presiding over the Senate, a large crowd gathered outside the Capitol. As noted above, temporary barricades and permanent barricades were in place around the exterior of the Capitol. USCP were present and attempting to keep the crowd away from the Capitol building as the proceedings were underway inside.

At such time, the certification proceedings were still underway, and the exterior doors and windows of the Capitol were locked or otherwise secured. Members of the USCP attempted to maintain order and to keep the crowd from entering the Capitol. However, around 2:00 p.m., individuals in the crowd forced entry into the Capitol. Some members of the crowd gained access and entry to the Capitol by breaking windows and assaulting members of the USCP. Others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m., members of the House of Representatives and Senate, including the President of the Senate, Vice President 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 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 that appeared to be captured on mobile devices of people present on the scene depicted evidence of violations of local and federal law, including many people inside the U.S. Capitol building without authority to be there.

Subject 2: Jeremiah Carollo (jeremiah [REDACTED]@gmail.com)

Records provided by Google revealed that the Google account jeremiah[REDACTED]@gmail.com was registered in the name of Jeremiah Carollo, with a recovery telephone number of ending in -7901.⁴

According to records obtained from Sprint, the telephone number ending in -7901 is subscribed to a person with the address [REDACTED], Glen Carbon, IL 62034.⁵

According to subscriber records obtained from Facebook, as of September 29, 2015, telephone number ending in -7901 is associated with the username “Jerry Carollo,” with an account identifier of “jerry.carollo.[REDACTED].”

According to records obtained from the Illinois Department of Motor Vehicles, Jeremiah Carollo’s address is [REDACTED], Glen Carbon, IL 62034 (the same address as listed in the Sprint records).

Subject 3: Cody Vollan ([REDACTED]vollan@gmail.com)

Records provided by Google revealed that the Google account [REDACTED]vollan@gmail.com was registered in the name of “C V,” with a recovery telephone number of ending in -5776.⁶

According to AT&T records, the subscriber for the telephone number ending in -5776, as of December 18, 2013, is Cody Vollan, with an address of [REDACTED], Lockport IL 60441.⁷

According to records obtained from the Illinois Department of Motor Vehicles, Cody Vollan’s address is [REDACTED], Lockport IL 60441 (the same address as listed in the AT&T records). This is the same address in Lockport, IL, as associated with the records for Anthony Carollo that are described above.

Video Footage

During the course of the investigation, law enforcement officers recovered video footage recorded within and around the U.S. Capitol Building on January 6, 2021. In this footage, law enforcement officers located images of people who appear fully consistent with the appearances of Anthony Carollo, Jeremiah Carollo, and Cody Vollan, based on comparisons with each man’s driver license photograph obtained from the Illinois Department of Motor Vehicles.

⁴ The full phone number is known to law enforcement, but only the last four digits are being included here due to the public nature of the filing.

⁵ The full address is known to law enforcement, but is partially redacted here due to the public nature of the filing.

⁶ The full phone number is known to law enforcement, but only the last four digits are being included here due to the public nature of the filing.

⁷ The full address is known to law enforcement, but is partially redacted here due to the public nature of the filing.

The following photos, taken from video footage recorded within and around the U.S. Capitol Building on January 6, 2021, show people whose appearances are consistent with the appearances of the people shown in the driver license photographs of Anthony Carollo, Jeremiah Carollo, and Cody Vollan, as indicated in the photos below:⁸

Photo 1



⁸ In Photos 3 and 4, Jeremiah Carollo's face is turned away from the camera, but he is wearing the same clothing and head covering as shown in the other Photos in which he is facing the camera.

Photo 2

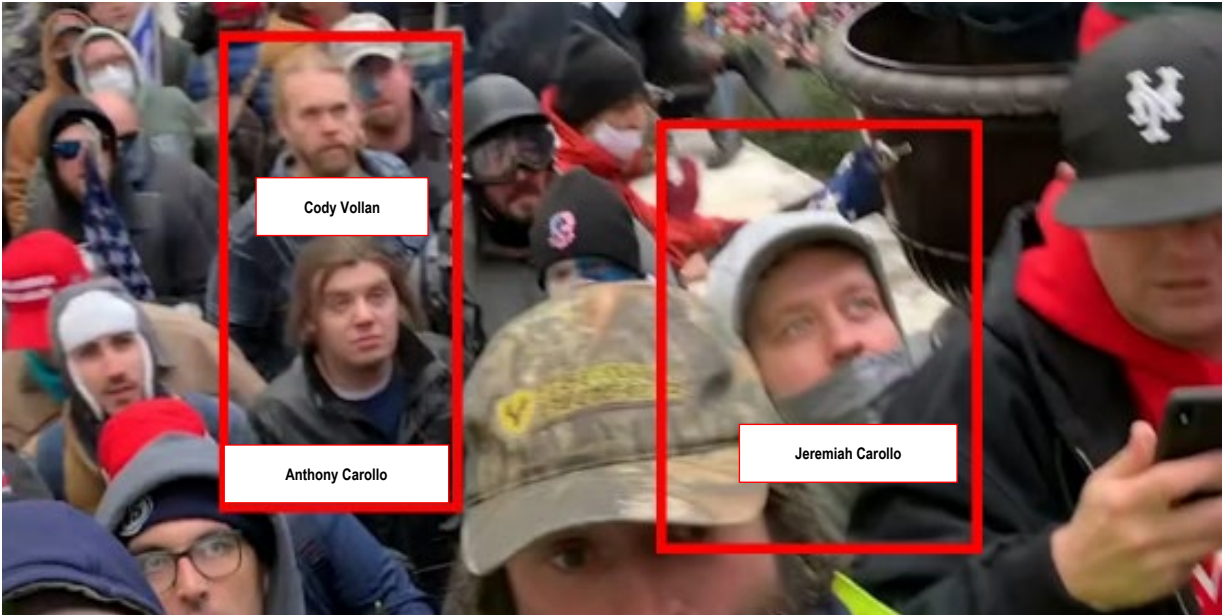


Photo 3



Photo 4



Photo 5

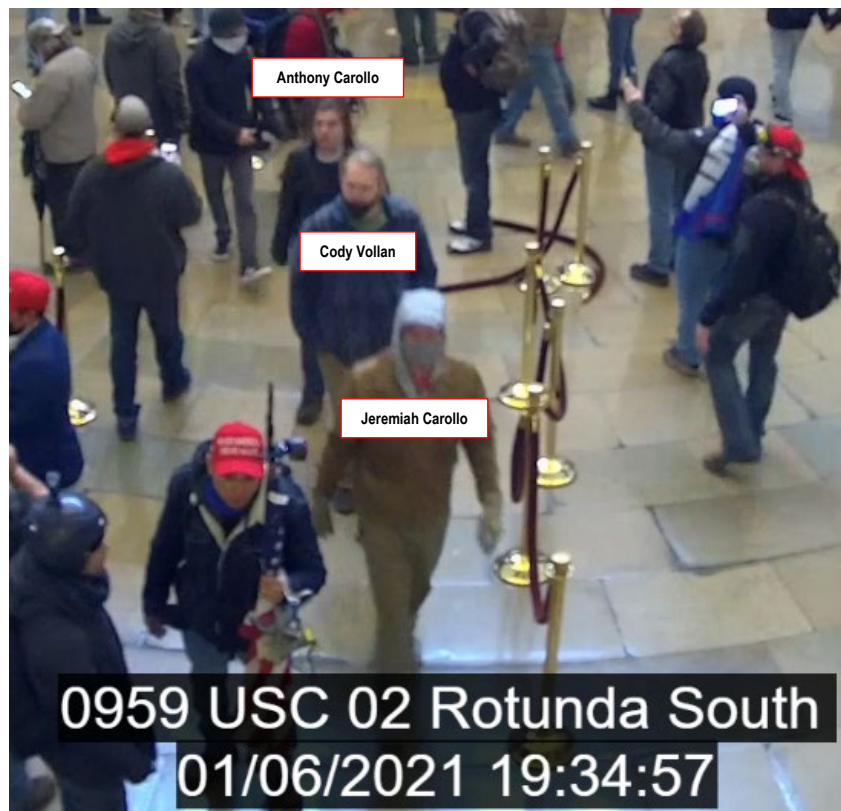


Photo 6



Interviews

On 10/27/2021, I and FBI SA Alex Dehr interviewed Witness-1, who is a family member of Anthony and Jeremiah Carollo (who are brothers) and was present at the residence at [REDACTED] Lockport, IL 60441 (the same address described above). Witness-1 is also related to Cody Vollan (Cody Vollan is the cousin of Anthony Carollo and Jeremiah Carollo). Witness-1 identified Anthony Carollo and Cody Vollan, in Photo 1 above. Witness-1 further stated that Jeremiah Carollo, was with Cody Vollan and Anthony Carollo at the Capitol on January 6, 2021.

On 10/27/2021, I and FBI SA Alex Dehr interviewed Anthony Carollo at his residence at [REDACTED] Lockport, IL 60441. He admitted that he was inside the U.S. Capitol Building on January 6, 2021. In addition, he verified his cell phone number as the phone number ending in -1136 (the same phone number described above). He stated that he traveled to Washington, D.C., with Cody Vollan and Jeremiah Carollo, who both entered the Capitol Building with him. He identified himself and Cody Vollan in Photo 1 above.

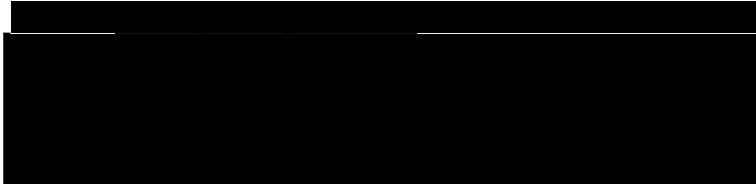
On 10/28/2021, I and FBI SA Alex Dehr interviewed Cody Vollan. He admitted that he was inside the U.S. Capitol Building on January 6, 2021. In addition, he verified that his cell phone number was the number ending in -5776 described herein. He stated that he traveled to Washington, D.C., with Anthony and Jeremiah Carollo, who entered the Capitol with him. He was shown Photos 1, 2, 4, and 5 above, and identified himself as well as Anthony and Jeremiah Carollo.

On 11/1/2021, FBI SA Nick Ponsano and FBI SA Omba Ngoma interviewed Jeremiah Carollo at his residence. He admitted that he was inside the U.S. Capitol Building on January 6,

2021. He stated that he traveled to Washington, D.C., with Anthony Carollo and Cody Vollan, who both entered the Capitol Building with him. In addition, he verified his cell phone number as the number ending in -7901 described herein. Jeremiah was shown Photos 1 and 6 above, and identified himself as well as Anthony Carollo and Cody Vollan.

Based on the foregoing, your affiant submits that there is probable cause to believe that Anthony Carollo, Jeremiah Carollo, and Cody Vollan violated 18 U.S.C. §§ 1752(a)(1) and (2), which make 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 Anthony Carollo, Jeremiah Carollo, and Cody Vollan violated 40 U.S.C. §§ 5104(e)(2)(D) and (G), which make 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.



Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 14th day of January, 2022.

G. MICHAEL HARVEY
U.S. MAGISTRATE JUDGE