

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
KEVIN CLARDY (DOB: XXXXXX)
THOMAS RIDDLE (DOB: XXXXXX)

) Case: 1:23-mj-00131
) Assigned To : Harvey, G. Michael
) Assign. Date : 6/20/2023
) 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) - Disorderly or Disruptive Conduct 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)(G) -Parade, Demonstrate, or Picket in any of the Capitol Buildings.
18 U.S.C. § 1361 -Willfully Injuring or Depredating of any Property of the Unites States.

This criminal complaint is based on these facts:

See attached statement of facts.

Continued on the attached sheet.



Complainant's signature



Printed name and title

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

Date: 06/20/2023

G. Michael Harvey

Digitally signed by G. Michael Harvey

Judge's signature

City and state: Washington, D.C.

G. Michael Harvey, U.S. Magistrate Judge

Printed name and title

Case: 1:23-mj-00131
Assigned To : Harvey, G. Michael
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STATEMENT OF FACTS

Your affiant, Task Force Officer (“TFO”) [REDACTED], is a deputy of the Anderson County Sheriff currently assigned to the Joint Terrorism Task Force (“JTTF”) of the Federal Bureau of Investigation (“FBI”). Specifically, I am tasked with investigating criminal activity in and around the United States Capitol grounds (“the Capitol”) on January 6, 2021. As a TFO for the FBI, 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 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.

1. Identification of Riddle and Clardy

According to records obtained through a search warrant that was served on Google, mobile devices associated with [boltsowner\[xx\]@gmail.com](mailto:boltsowner[xx]@gmail.com) and [kevinclardy\[xx\]@gmail.com](mailto:kevinclardy[xx]@gmail.com) were unlawfully present inside the U.S. Capitol on January 6, 2021. Pursuant to legal process, Google provided law enforcement agents with further information for each of the above accounts. Those records revealed that boltsowner[xx]@gmail.com used the phone number, (XXX) XXX-6100, as the recovery contact phone number in case the account user needed assistance or forgot his/her password and that the kevinclardy[xx]@gmail.com account used (XXX) XXX-5776 as the recovery contact phone number for the account.

Agents determined that Verizon Wireless provided service for both the 6100 phone number and that T-Mobile provided service for the 5776 phone number. Pursuant to subpoenas, Verizon Wireless and T-Mobile provided law enforcement agents with subscriber information for the above accounts. The subscriber for the 6100 phone number is Brenda Smith in Travelers Rest, SC with an Authorized User Account Manager Corey Riddle (RIDDLE) with an effective date of 9/18/2020. The subscriber for the 5776 number is Kevin S Clardy (CLARDY) in Greenville SC.

Using the above subscriber information, agents searched South Carolina Department of Motor Vehicle records and found driver's license photographs of RIDDLE and CLARDY. The South Carolina Department of Motor Vehicle records indicate that RIDDLE lists the same address as Brenda Smith in Travelers Rest, SC, and that CLARDY lives at the Greenville, South Carolina address associated with his T-Mobile cell phone account.

Agents searched Facebook and found a publicly available profile for "Corey Riddle." The account featured photos depicting events at the US Capitol. See Image 1. The profile listed the account holder's birthdate which matches that listed on the SC Driver's license of RIDDLE. In the comments posted on this profile, RIDDLE called the events of January 6th "wild as hell" and "crazy" and noted he was "trying to not get arrested." See Image 2. The photos show a distinct tattoo on Riddle's hand. See Image 3.



Image 1



Image 2



Image 3

Agents also obtained Google records and data for [kevinclardy\[xx\]@gmail.com](mailto:kevinclardy[xx]@gmail.com) which contained location data, photos, and videos.

Google records provided a picture of RIDDLE and CLARDY taken on the morning of January 6, 2021. CLARDY was photographed wearing a black in color leather jacket, black and white bandana, and ball cap with an American flag. RIDDLE was photographed wearing a dark blue in color hooded sweatshirt, tan ballcap, and backpack with tan or similarly colored straps. See Image 4.

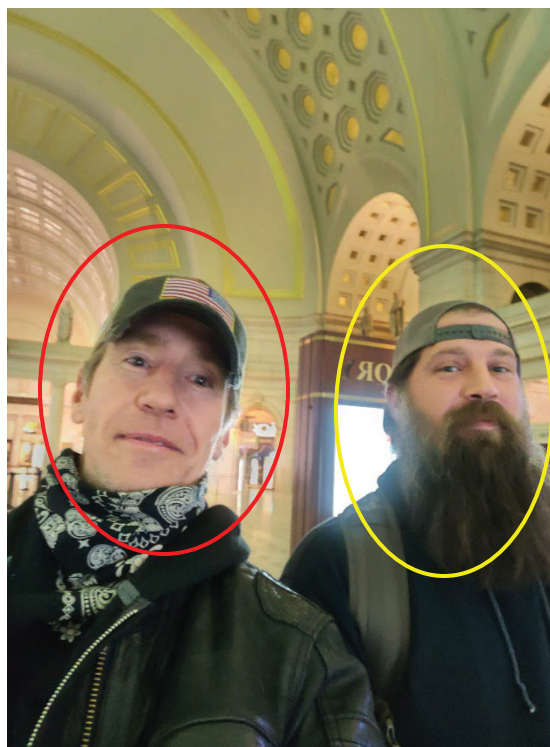


Image 4 CLARDY circled in red and RIDDLE circled in yellow

2. Entry into U.S. Capitol

Based on a review of open source and surveillance videos, law enforcement confirmed that RIDDLE and CLARDY entered the U.S. Capitol building on January 6, 2021.

Based on US Capitol CCTV footage, CLARDY (circled in red) and RIDDLE (circled in yellow) are observed entering the U.S. Capitol at approximately 2:42 p.m. on January 6th through the Senate Fire door (also known as the Senate Parliamentarian door). See Image 5. They remained just inside the doorway for approximately 49 seconds before exiting the building through the same door at 2:43:38. See Image 6.



Image 5



Image 6

CLARDY and RIDDLE re-entered the building again through Senate Fire door at 2:44:28 p.m. See Image 7. Approximately 24 seconds later, they assisted a crowd attempting to break a door leading to office S131. See Image 8. Damage to the door consisted of splintered and damaged wood, costing \$9,860.00 to repair per the Architect of the Capitol.



Image 7

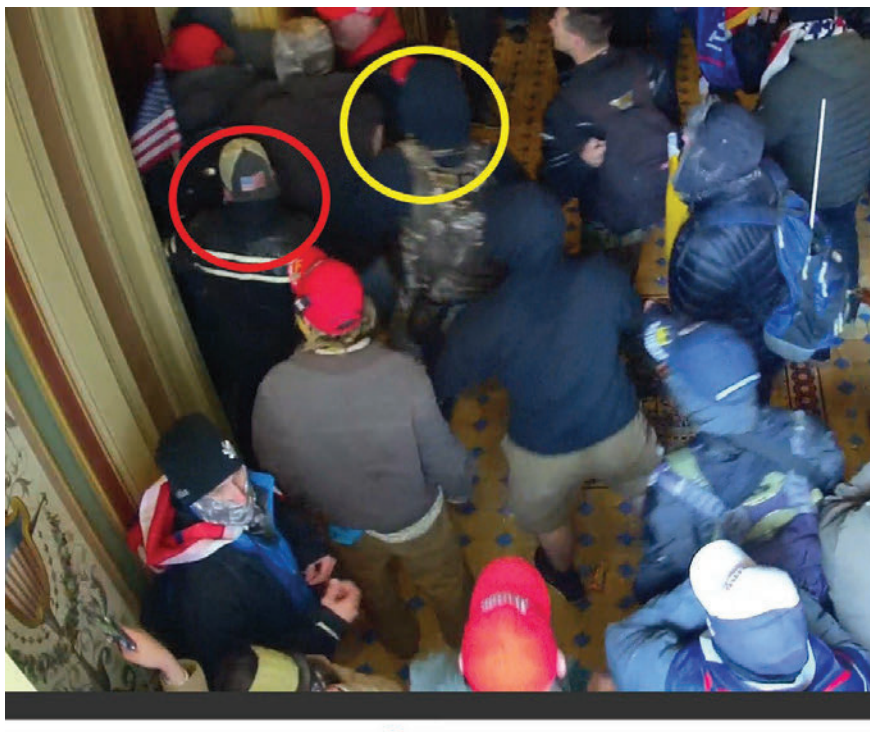


Image 8

They both entered that office with the crowd and exited the office through the same door approximately 50 seconds later at 2:45:02pm. See Image 9.



Image 9

CLARDY and RIDDLE lingered in front of the office for approximately 46 seconds before leaving the building again at 2:45. They re-entered the building at approximately a minute later through the Senate Fire door and entered office S131. See Images 10 and 11.



Image 10

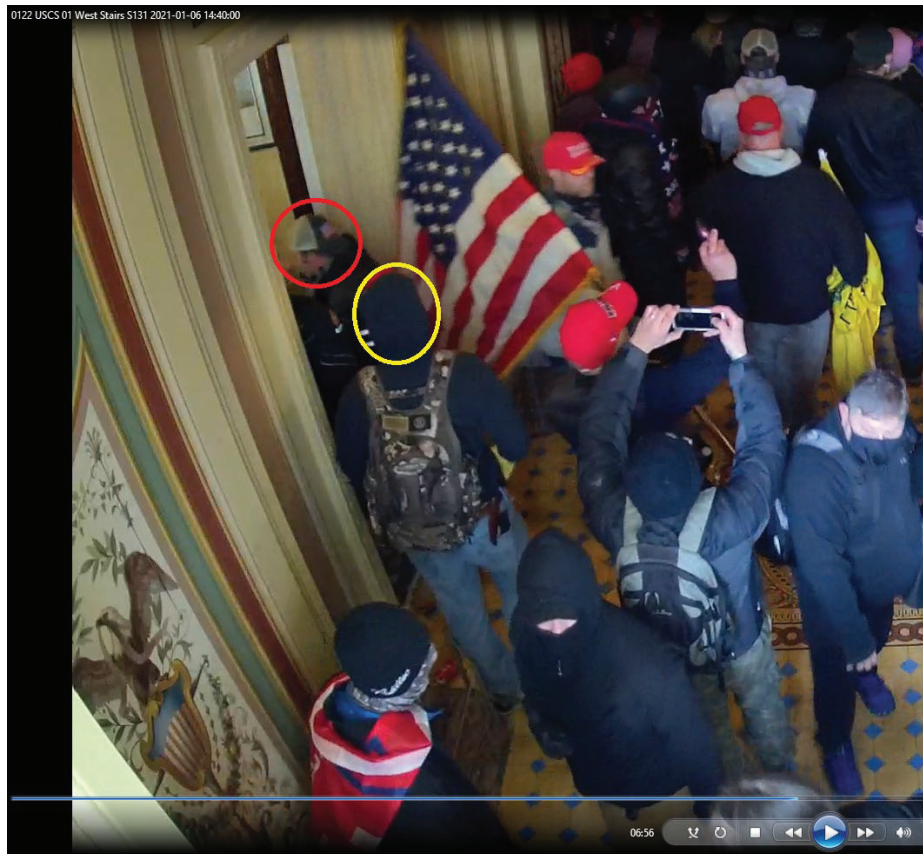


Image 11

They remained in office S131 for approximately 1 minute, exiting at 2:47:56. They linger in front of office S131 taking more photos until departing out the Senate Fire door at approximately 2:49 p.m. See Images 12, 13 and 14.



Image 12

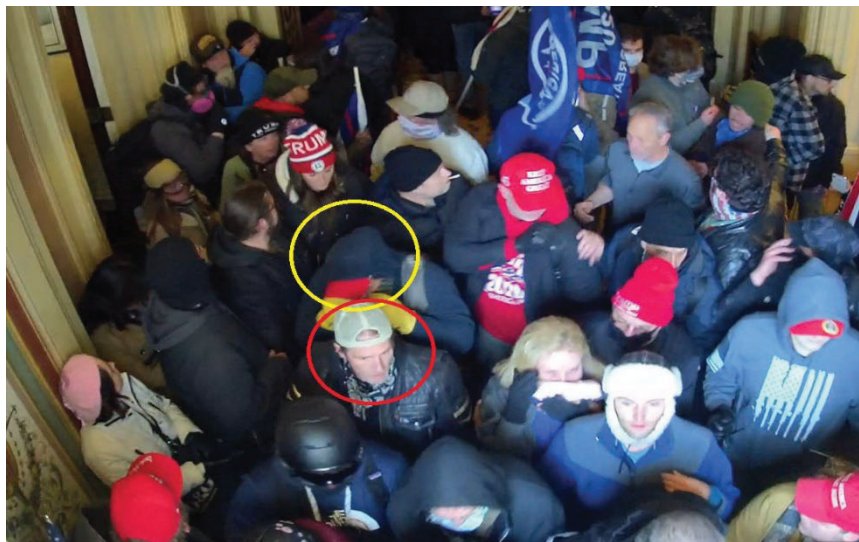


Image 13



Image 14

Google location data confirmed both traveled to Washington DC and the US Capitol. CLARDY's records yield numerous photos and videos taken on January 6, 2021. Law enforcement obtained Facebook and Google records for both RIDDLE and CLARDY. Google provided photos depicting scenes from the Capitol including those taken inside the building, including what appears to be the interior of office S131. See Image 15. A photo of RIDDLE taken inside of office S131 shows a distinct tattoo on his hand. See Image 16 circled in green.



Image 15



Image 16

On May 6, 2022, law enforcement interviewed both RIDDLE and CLARDY. During the interviews that followed, both admitted to going to Washington D.C. and entering the U.S. Capitol. Both acknowledge helping break open the office door. Both identified themselves in still images of CCTV videos when presented. The interview was audio and video recorded.

Law enforcement officers confirmed they appear to resemble the individuals in the images herein. RIDDLE was also observed to have a tattoo resembling that seen in earlier images on his hand. RIDDLE consented to agents examining the photos and videos on his phone. Numerous images and videos taken in Washington and at the Capitol were obtained depicting events of January 6, 2021. See Image 17.



Image 17

RIDDLE also met later with agents and provided the remaining clothing items he still possessed from January 6th to be photographed including his backpack worn and face covering. CLARDY later met with agents to allow remaining clothing items he still possessed from January 6th to be photographed.

Based on the foregoing, your affiant submits that there is probable cause to believe that RIDDLE and CLARDY 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 RIDDLE and CLARDY violated 40 U.S.C. § 5104(e)(2)(D)&(G), 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.

Your affiant submits there is probable cause to believe that RIDDLE and CLARDY violated 18 U.S.C. § 1361, by willfully injuring or deprecating of any property of the United States.

Damage to the door consisted of splintered and damaged wood, costing \$9860.00 to repair per the Architect of the Capitol.

[REDACTED]

[REDACTED]

Federal Bureau of Investigations

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 20th day of June 2023.

G. Michael
Harvey

Digitally signed by G.
Michael Harvey
Date: 2023.06.20 11:52:34
-04'00'

HON. G. MICHAEL HARVEY
UNITED STATES MAGISTRATE JUDGE