

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.

Leticia Vilhena Ferreira (AKA: Vilhena Ferreira)
DOB: XXXXXX

Case: 1:22-mj-00027
Assigned to: Judge Meriweather, Robin M.
Assign Date: 2/14/2022
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) and (a)(2) - Knowingly Entering or Remaining in any Restricted Building or
Grounds Without Lawful Authority,
40 U.S.C. § 5104(e)(2)(D) and (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.

[Handwritten signature]

Complainant's signature

Khalid Bin-Walid, Officer
Printed name and title

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

Date: 02/14/2022

[Handwritten signature]



Zia M. Faruqui
2022.02.14 15:40:00
-05'00'

Judge's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge
Printed name and title

## STATEMENT OF FACTS

Your Affiant, Khalid Bin-Walid, is a Task Force Officer with the Federal Bureau of Investigation (FBI) assigned to the Chicago Joint Terrorism Task Force (JTTF). In my duties as a Task Force Officer, I have gained training and experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, the exploitation of lawfully obtained evidence and data, and various other procedures. In addition to my regular duties, I am also currently reviewing public tips, videos, and documentation, among other evidence, associated with the riots and civil disorder that occurred. 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 United States (U.S.) Capitol building 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 U.S. Congress convened at the U.S. Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the U.S. House of Representatives and the U.S. 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 U.S. 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 U.S. House of Representatives and U.S. 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 U.S. 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.

Since January 6, 2021, the FBI has been investigating and identifying those who were inside of the U.S. Capitol without authority and disrupted the proceedings. During that investigation, a witness showed FBI Special Agents a video that purported to have been recorded from within the U.S. Capitol on January 6, 2021. The witness stated the video was shared with the witness by a “Leticia” from telephone number XXX-XXX-9199 (9199). The witness met “Leticia” at the protest where “Leticia” indicated through conversation that she was located near Chicago. Open-source information revealed that this telephone number, ending in 9199, was an active wireless telephone with the associated subscriber as Leticia Vilhena Ferreira, 6820 Joliet Road, Indian Head Park, Illinois. Subsequently, pursuant to legal process, your Affiant learned that this number, ending in 9199, is registered to the Defendant —Leticia Vilhena FERREIRA (FERREIRA).

On April 2, 2021, Agents, including your Affiant, interviewed FERREIRA at her home, 6820 Joliet Road, Indian Head Park, in Illinois, regarding her whereabouts on January 6, 2021. FERREIRA stated she flew to Washington, D.C. alone on January 5, 2021, and flew home on January 7, 2021. FERREIRA stated she was a citizen of Brazil and present in the U.S. on a work visa and was therefore not able to vote. However, FERREIRA followed the news of the 2020 election and wanted to travel to Washington, D.C. to see President Trump speak. FERREIRA stated she attended the Washington D.C. march wearing black shoes, black pants, a Michael Kors camo colored jacket, and a red beanie bearing the word “Trump.” FERREIRA stated she was unable to see or hear President Trump’s speech from her location, so many people started to march toward the U.S. Capitol building before the speech ended. FERREIRA stated the crowd eventually arrived at the U.S. Capitol building, and she continued to follow them into the building. FERREIRA stated she was likely in the building for approximately twenty minutes, leaving at approximately 1500 hours. FERREIRA stated she took photographs and videos of the event with her mobile phone, and voluntarily offered to provide them to interviewing Agents. FERREIRA provided pictures and videos, via Apple AirDrop, taken inside the U.S. Capitol building, but she was not depicted in any those videos and pictures because she was the photographer. These images

confirm that FERREIRA was inside the U.S. Capitol on January 6, 2021. Indeed, a video that she provided showed individuals entering the U.S. Capitol on January 6, 2021 and showed that alarms were sounding within the U.S. Capitol when FERREIRA started her recording – shortly after her entry into the U.S. Capitol.

Below are two images taken inside the U.S. Capitol building by FERREIRA and provided to interviewing Agents by FERREIRA:





Your Affiant reviewed security video recorded by U.S. Capitol Police security cameras on January 6, 2021. Your Affiant located FERREIRA within this security video, observing that she was inside the U.S. Capitol. Your Affiant captured two still-images from this video and included them below. FERREIRA was observed to wear a camo-colored jacket and a red beanie bearing the word “Trump,” which matches the clothing that FERREIRA stated that she wore during her

aforementioned FBI interview. Your Affiant, having interviewed FERREIRA in person, was able to positively identify the individual circled in the interior Capitol images below as FERREIRA.





U.S. Capitol Police security video shows that FERREIRA made her way to the Crypt, a location within the U.S. Capitol building. Your Affiant took a still image from this video, circled FERREIRA, and included the image in this affidavit below. Your Affiant, having interviewed FERREIRA in person, was able to positively identify the individual in the image below as FERREIRA. This is corroborated by FERREIRA's statement that she was inside the U.S. Capitol on January 6, 2021, and because FERREIRA was wearing the clothing that she described in her FBI interview.



Your Affiant also viewed two open-source videos, recorded by other individuals within the Crypt on January 6, 2021, that show FERREIRA inside the Crypt. FERREIRA was wearing the clothing that she described during her interview and her appearance matched her appearance in U.S. Capitol Police security camera footage. These two videos showed that FERREIRA was present when excited rioters screamed “Our House” and “Stop the Steal.” Around that time, rioters physically rushed the U.S. Capitol Police Officers who tried to prevent the further advance of the rioters within the Capitol building – however FERREIRA did not appear to have participated in any assault on officers.

Your Affiant has also reviewed FERREIRA’s driver’s license photo and her passport photo and confirmed that these photos matched FERREIRA’s appearance during the interview on April 2, 2021, and matched FERREIRA’s appearance within U.S. Capitol Police security camera footage, described previously.

On August 26, 2021, U.S. Magistrate Judge Zia M. Faruqi authorized a search warrant for FERREIRA’s telephone number ending in 9199. According to records, obtained through this search warrant and other legal process, the telephone number ending in 9199 was identified as having utilized a cell site consistent with providing service to a geographic area within the vicinity of the U.S. Capitol, and within Washington D.C. The data was not specific enough to place the



phone using the number 9199 within the U.S. Capitol building, however, it does indicate the following about the phone's location:

- On 05 January 2021, between 12:00 AM EST and 3:00 PM EST, the records are consistent with the telephone associated with this number being in the vicinity of Indian Head Park, IL / Burr Ridge, IL.
- On 05 January 2021, between 9:00 PM EST and 11:00 PM EST, the records are consistent with the telephone associated with this number being in the vicinity of the Baltimore-Washington International (BWI) Airport and BWI surrounding cities.
- On 06 January 2021, records are consistent with the telephone associated with this number being in the Washington D.C. and Arlington, VA. area.
- On 07 January 2021, between 2:00 PM EST and 3:00 PM EST, the records are consistent with the telephone associated with this number being in the vicinity BWI airport.
- On 08 January 2021, records are consistent with the telephone associated with this number being in the vicinity of Indian Head Park, IL / Burr Ridge, IL.

Text messages, obtained by authority of the aforementioned search warrant, show that FERREIRA texted another and told this individual that she (FERREIRA) was at the U.S. Capitol riot:

MessageTime	From	Recipient	Message
1/7/2021 11:45	9199	0325	Do you think they will go after all the people walking in the capitol area?
1/7/2021 11:45	0325	9199	Don't be sad. Be prepared. We are all fucked.
1/7/2021 11:45	0325	9199	Yes they will go for all of those people.
1/7/2021 11:46	9199	0325	I was so irresponsible to walk there. I was with this nice family. This gentleman and two sons. Pacific walking
1/7/2021 11:46	0325	9199	If there were cameras they are going to go after them.
1/7/2021 11:47	9199	0325	There were cameras
1/7/2021 11:47	0325	9199	How long after the actual break in did you go in there?
1/7/2021 11:47	9199	0325	I don't know
1/7/2021 11:48	9199	0325	I didn't see who were breaking in
1/7/2021 11:48	9199	0325	I was just walking
1/7/2021 11:48	0325	9199	Ok you are probably ok. I think they are more worried about the people that broke through the barriers.
1/7/2021 11:49	9199	0325	I just realized there were barriers even in the grass in the park
1/7/2021 11:49	9199	0325	Because I read later
1/7/2021 11:49	0325	9199	There were people fighting with the police.
1/7/2021 11:49	9199	0325	I'm so irresponsible. Yesterday it felt amazing.
1/7/2021 11:50	9199	0325	It was visible from far

1/7/2021 11:50	9199	0325	I saw it when I was leaving because more people were trying to break in again
1/7/2021 11:50	9199	0325	The ones that came later you know
1/7/2021 11:50	0325	9199	Im sure you felt amazing! If you see crowds gathering today...anywhere...walk the other way.
1/7/2021 11:51	9199	0325	I'm just going to work now I'm the am and take half day off

Based on the foregoing, your Affiant submits that there is probable cause to believe that FERREIRA 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. 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.

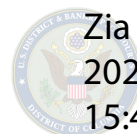
Your Affiant submits there is also probable cause to believe that FERREIRA violated 40 U.S.C. §§ 5104(e)(2)(D) and (G), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in 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.




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Khalid Bin-Walid  
Task Force Officer  
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 February, 2022.

Zia M. Faruqui  
2022.02.14  
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HONORABLE ZIA M. FARUQUI  
UNITED STATES MAGISTRATE JUDGE