

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

RECEIVED

Holding a Criminal Term

MAY 18 2023

Grand Jury Sworn in on March 16, 2023

Clerk, U.S. District and  
Bankruptcy Courts

UNITED STATES OF AMERICA : CRIMINAL NO. 23-cr-  
: :  
v. : GRAND JURY ORIGINAL  
: :  
SHANE LAMOND, : VIOLATIONS:  
: :  
Defendant. : Count 1: D.C. Code § 22-722  
: (Obstruction of Justice)  
: :  
: Counts 2-4: 18 U.S.C. § 1001(a)(2)  
: (False Statements)  
:

INDICTMENT

The Grand Jury charges that, at all times material to this Indictment, on or about the dates and at the approximate times stated below:

Background

1. Defendant SHANE LAMOND was a Lieutenant in the District of Columbia Metropolitan Police Department (“MPD”). LAMOND supervised the Intelligence Branch of MPD’s Homeland Security Bureau.

2. As the Lieutenant in charge of the Intelligence Branch, LAMOND’s responsibilities included supervising MPD’s efforts to gather information about forthcoming rally or protest activity in the District of Columbia that may pose public safety threats to the community.

3. The Proud Boys (“Proud Boys”) described itself as a “pro-Western fraternal organization for men who refuse to apologize for creating the modern world; aka Western

Chauvinists.” Members of the Proud Boys routinely attended rallies, protests, and other events in the District of Columbia, some of which resulted in violence involving members of the group.

4. Through at least January 6, 2021, Enrique Tarrío was the national chairman of Proud Boys.

*Communications between LAMOND and Enrique Tarrío*

5. Beginning in July 2019 and continuing to at least January 2021, LAMOND and Tarrío were in regular contact regarding the Proud Boys’ planned activities in the District of Columbia. They communicated at least 500 times using cloud-based messaging services, including Google Voice, Apple iMessages, and Telegram, an encrypted messaging application.

6. Between February 10, 2020, and July 4, 2020, LAMOND and Tarrío used Google Voice to exchange 56 messages and participate in five (5) calls.

7. Between August 20, 2020, and December 12, 2020, LAMOND and Tarrío used Apple iMessage to exchange 294 text messages.

8. Between July 3, 2020, and December 17, 2020, LAMOND and Tarrío used Telegram to exchange 79 messages using the private chat function.

9. Between December 18, 2020, and through at least January 4, 2021, LAMOND and Tarrío used Telegram to exchange approximately 145 messages using the secret chat function, utilizing end-to-end encryption and self-destruct timers. At least 101 of these messages were destroyed.

*LAMOND Used Encrypted Messaging and Provided Tarrío  
Information Relating to Law Enforcement Activity*

10. As early as at least July 2020, LAMOND began using Telegram to provide information to Tarrío about law enforcement activity relating to the Proud Boys’ activities in Washington, D.C.

11. For example, on July 8, 2020, using Telegram, LAMOND notified Tarrío that a bar in Washington, D.C. frequented by Tarrío and members of Proud Boys might be subject to sanctions after an Alcohol and Beverage Control violation was reported. LAMOND informed Tarrío, "I'm working on finding out what sanctions might be imposed. As soon as I find out I will let you know."

12. On November 7, 2020, vote counts revealed that President Joseph R. Biden had won the 2020 Presidential Election, and several news organizations began reporting this fact.

13. At 1:08 p.m. on November 7, 2020, LAMOND texted Tarrío, "Hey brother, sad, sad news today. You all planning anything?" Tarrío responded, "Yep."

14. At 2:10 p.m. on November 7, 2020, using Telegram, LAMOND told Tarrío that "Need to switch to encrypted. Alerts are being sent out to LE that [Social Media Website] accounts belonging to your people are talking about mobilizing and 'taking back the country'. [sic] Getting people spun up. Just giving you a heads up."

15. At 2:14 p.m. on November 7, 2020, using Telegram, Tarrío sent LAMOND an audio message.

16. At 2:16 p.m. on November 7, 2020, using Telegram, LAMOND told Tarrío, "Got your voice messages. Just giving you a heads up. Please keep this between you and me."

17. On November 13, 2020, Tarrío came to Washington, D.C., to attend a rally scheduled for the next day to contest the results of the 2020 Presidential Election.

18. Earlier on November 13, 2020, LAMOND texted Tarrío, "I'm staying in D.C. tonight. Let me know if you go out and I may stop by."

19. After Tarrío later told LAMOND that he was heading to a bar in Washington, D.C., frequented by members of the Proud Boys, LAMOND responded, "Check telegram."

20. Around the same time, on Telegram, LAMOND told Tarrío, "Just giving you a heads up there's a lot of attention at [the bar] right now. If it doesn't calm down they are going to shut [the bar] dow[n]." A short time later, LAMOND told Tarrío through Telegram, "Just wanted to let you know. I heard [the District of Columbia Alcoholic Beverage Regulation Administration] already on scene."

21. On December 11, 2020, Tarrío and other members of the Proud Boys were in Washington, D.C., in advance of a rally planned for December 12, 2020, to protest the results of the 2020 Presidential Election. That evening, Tarrío, using Telegram, informed LAMOND that Tarrío and members of the Proud Boys were "going to have a briefing tonight at 1030 at the national mall" and that they were marching from a hotel in Washington, D.C. LAMOND responded, using Telegram, "Copy. Antifa should be staying up at BLM Plaza. Do you want me to let our uniformed officers know that or keep it to myself? I will be around all night in case anything kicks off." Immediately after, using Telegram, Tarrío sent LAMOND an audio message.

*MPD Investigation of Tarrío*

22. On December 12, 2020, Tarrío and other members of the Proud Boys attended a rally in Washington, D.C., organized to protest the results of the 2020 presidential election.

23. Later in the evening of December 12, 2020, Tarrío participated in the theft and burning of a banner that read "#BLACKLIVESMATTER" ("the BLM Banner"), which was property of Asbury United Methodist Church in Washington, D.C.

24. After the theft and burning was reported to law enforcement, MPD initiated an investigation ("the BLM Banner Burning Investigation"). The BLM Banner Burning Investigation was handled by MPD's riot task force, which consisted of various MPD detectives.

25. On December 17, 2020, Tarrío posted a message to a social media account in which he admitted he was the “person responsible for the burning.”

26. On December 18, 2020, MPD received an anonymous tip that Tarrío had claimed responsibility for the burning.

27. On December 30, 2020, MPD and the U.S. Attorney’s Office for the District of Columbia applied to the D.C. Superior Court for a warrant to arrest Tarrío for destruction of property for his participation in the destruction of the BLM Banner. The same day, a judge of the D.C. Superior Court signed the arrest warrant, and the warrant was issued.

28. On January 4, 2021, Tarrío flew from Miami, Florida, to Arlington, Virginia. After landing in Arlington, Virginia, Tarrío traveled into the District of Columbia. After entering the District of Columbia, Tarrío was arrested pursuant to the December 30, 2020, warrant.

*LAMOND Gave Tarrío Confidential Law Enforcement Information  
about the BLM Banner Burning Investigation*

29. Meanwhile, from the time of the destruction of the BLM Banner through January 4, 2021, LAMOND and Tarrío were in regular contact about the BLM Banner Burning Investigation and Tarrío’s involvement in the destruction of the BLM Banner.

30. On December 18, 2020, after LAMOND learned of the anonymous tip MPD received identifying Tarrío as the individual responsible for burning the BLM Banner, LAMOND contacted Tarrío on Telegram. To contact Tarrío, LAMOND used a chat on Telegram with the highest level of encryption available. LAMOND and Tarrío then had the following exchange:

LAMOND: Hey brother, did you call in an anonymous tip to MPD claiming responsibility for the banner burning?

TARRIO: I did more than that. It’s on my social media.

LAMOND: I gotcha. Someone called in an anonymous tip saying that you claimed responsibility for it.

TARRIO: This wasn't a hate crime. And I want to see it play out.

LAMOND: I'm curious to see what happens too. I will check with our CID [Criminal Investigations Division] people if they have you on video.

31. Soon after, Tarrío, using Telegram, told other members of the Proud Boys that "We got the jump on the narrative for the banner burning. This should make it next it impossible for them to use 'hate crime' enhancement. As per my contact at DC Metro... This stays in here."

32. Later on December 18, 2020, using the same encrypted chat function, after Tarrío asked LAMOND if LAMOND thought "they'll make a stink of it," LAMOND responded: "No, a bit of the opposite. I've been talking to CID about it. They wanted to know what I know about your group and if I think you all are racist. I told them you are made up a lot of Latinos and blacks so not a racist thing. If anything I said it's political but then I drew attention to the Trump and American flags that were taken by Antifa and set on fire. I said all those would have to be classified as hate crimes too. It's not being investigated by FBI though. Just us (MPD)."

33. A short time later on December 18, 2020, LAMOND, using the same encrypted chat function, told Tarrío: "I don't think they have any pictures of you though." After Tarrío sent an image file to LAMOND, LAMOND responded, "Got it. We will see if we can ID the person."

34. Soon after, Tarrío, using Telegram, copied the information that he had received from LAMOND and shared it with other members of the Proud Boys.

35. Tarrío, using Telegram, also told an individual "So I just got word... we're clear on the banner."

36. Tarrío then posted on Parler, a social media network, that "...I'm here to tell you that no hate crime was committed. The only hate there is in my heart is for communism and an authoritarian government. BLM is a Marxist movement. It isn't about the color of someone's

skin. Against the wishes of my attorney I am here today to admit that I am the person responsible for the burning of this sign. And I am not ashamed of what I did because I didn't do it out of hate... I did it out of love. Love for a country that has given my family SO MUCH. The burning of this banner wasn't about race religion or political ideology it was about a racist movement that has terrorized citizens of this country. I will not standby [sic] and what them burn another city. So let me make this simple. I did it. Come get me if you feel like what I did was wrong. We'll let the public decide. Forever PROUD. Enrique."

37. On December 19, 2020, LAMOND, using the same encrypted chat, function told Tarrío that "[p]olice want to talk to you about the banner" and asked Tarrío if there was a phone number Tarrío wanted LAMOND to give the police.

38. On December 20, 2020, from 4:40 p.m. to 4:51 p.m., LAMOND and Tarrío exchanged the following encrypted messages:

TARRIO: Miami Dade PD reached out. I'm going to use my 5th. I'll be in DC on the 6th if MPC wants to talk to me they can see me there. Are they pushing the hate crime thing?

LAMOND: Give me a call when you can

TARRIO: Through here?

39. On December 20, 2020, at 4:51 p.m., Tarrío called LAMOND using Telegram. The call lasted approximately 7 minutes.

40. On December 22, 2020, approximately two minutes after Tarrío sent LAMOND a screenshot of a message he received from an MPD detective assigned to the BLM Banner Burning Investigation through Telegram, LAMOND changed the settings of his encrypted chat with Tarrío on Telegram so that future messages would delete 5 seconds after the recipient opened them.

41. On December 25, 2020, on the same encrypted chat, LAMOND informed Tarrío, "Just a heads up, CID had me ID you from a photo you posted on [social media website] kneeling

down next to the BLM banner so they may be submitting an arrest warrant to US Attorney's Office."

42. On December 30, 2020, at 6:20 p.m., LAMOND called Tarrío using Telegram. The call lasted approximately 14 minutes.

43. After the call with LAMOND, at 6:38 p.m., Tarrío initiated an "Emergency Voice Chat" with the group "Ministry of Self Defense."

44. On that same day, at 6:55 p.m., Tarrío, using Telegram, sent a message to Person 1, stating, "My contact just called me... DA hasn't signed it yet..."

45. On that same day, at 7:13 p.m., Tarrío, using Telegram, sent several messages to the "Ministry of Self Defense" group chat:

TARRIO: Info stays here

.....

TARRIO: No one else knows

....

TARRIO: It just the misdemeanor. Not hate crime.

TARRIO: And it hasn't been solid yet.

....

TARRIO: They'll probably drop the charges or something

TARRIO: They just want to arrest

PERSON 2: Is it coming on the 6<sup>th</sup>?

TARRIO: The DA might or might not give it to them

TARRIO: I'm pushing for it

46. On January 1, 2021, at approximately 1:06 p.m., LAMOND sent several messages

to Person 3, an official with the Capitol Police Department, stating "TIGHT HOLD on this but I may lose him as a source soon. Our CID got a warrant for him burning them BLM banner. They are going to pick him up next week when he is in town so he may not speak to me anymore... They were contemplating making this one a hate crime. I said if that's the case they would have to make all of the us taken and burned by Antifa hate crimes. They backed off then... in the end it's just a misdemeanor charge so it won't go far but it was very political."

47. That same day, beginning at approximately 1:33 pm, Tarrío, using Telegram, sent several messages to Person 4, stating, "DC metro submitted an arrest warrant to the Attorneys office . . . Destruction of property. No hate crime enhancement . . . But he says that he's doesn't think they're going to sign off on it . . . Because they're afraid I'll take it to trial and their argument is weak."

*LAMOND Tipped off Tarrío About the Warrant for His Arrest*

48. On January 4, 2021, Tarrío flew from Miami, Florida to Arlington, Virginia. At approximately 1:02 p.m., while Tarrío was in flight, LAMOND changed the settings of his encrypted chat with Tarrío on Telegram so that future messages would delete 10 seconds after the recipient opened them. Using Telegram, LAMOND then sent a message to Tarrío while Tarrío was in flight.

49. On January 4, 2021, at 1:30 p.m., while on the flight from Miami, Florida, to Arlington, Virginia, using Telegram, Tarrío sent several messages to Person 5 containing information he received from LAMOND:

TARRIO: Warrant was just signed

PERSON 5: OMG

PERSON 5: Babe :/

TARRIO: It's cool. They'll have to have me in and out

PERSON 5: When you land? Are they taking you on stage

PERSON 5: This is so fucked

TARRIO: Don't know if my contact will tell me that

50. On January 4, 2021, at approximately 1:31 p.m., while on the flight from Miami, Florida, to Arlington, Virginia, Tarrío messaged the group chat "Ministry of Self Defense" and stated, "The warrant was just signed."

51. LAMOND did not tell MPD personnel handling the BLM Banner Burning Investigation that he had given Tarrío information about the status of the investigation or that Tarrío had made admissions to LAMOND about Tarrío's involvement in the destruction of the BLM Banner.

52. LAMOND did not provide his communications with Tarrío about the BLM Banner Burning Investigation or Tarrío's involvement in the destruction of the BLM Banner to anyone at MPD.

*The January 6, 2021, Attack on the United States Capitol  
and the Subsequent Federal Investigation*

53. On January 6, 2021, a riotous mob forced entry into the U.S. Capitol in Washington, D.C., by breaking windows, ramming open doors, and assaulting local and federal law enforcement officers ("the January 6 Attack"). Other crowd members encouraged and otherwise assisted the forced entry. As a result of the attack on the U.S. Capitol building, Congress's certification of the 2020 presidential election results was interrupted and delayed.

54. Members and associates of the Proud Boys were present at and participated in the January 6 Attack, and were subsequently convicted for their illegal conduct.

55. Immediately following the January 6 Attack, the Federal Bureau of Investigation

("FBI") and the United States Attorney's Office for the District of Columbia ("USAO") launched a criminal investigation, for which a federal grand jury was convened in the District of Columbia ("the Federal Investigation").

56. By January 7, 2021, LAMOND was aware of the Federal Investigation.

57. As part of the Federal Investigation, beginning on January 6, 2021, and continuing to the present, the FBI and USAO investigated and continue to investigate Tarrio's, the Proud Boys', and their associates' participation in and planning for the January 6 Attack.

*Tarrio Provided LAMOND with Information about the January 6 Attack*

58. On December 19, 2020, using Telegram, LAMOND asked Tarrio to let LAMOND know if the Proud Boys was going to participate in the rally planned for January 6, 2021, in Washington, D.C. Tarrio responded that if the Proud Boys participated it would be "extremely small and not in colors."

59. On December 20, 2020, using Telegram, Tarrio told LAMOND that Tarrio would be in Washington, D.C. on January 6, 2021.

60. From January 7, 2021, through at least January 9, 2021, using Telegram, LAMOND and Tarrio exchanged messages about the January 6 Attack and the involvement of Tarrio's associates in it.

61. On January 7, 2021, using Telegram, LAMOND and Tarrio exchanged the following messages:

TARRIO: I think I could have stopped this whole thing.

LAMOND: I don't know, bro. You know it's fucking bad when [Person 6] was the voice of reason and they wouldn't listen to him. He got on the bullhorn and urged everyone to stop attacking the police and march around the US Capitol and they ignored him

LAMOND: How you holding up? I checked on your charges and the Poss of High Capacity Mags is a felony

TARRIO: So gay

TARRIO: Yeah but I have guys I can line up . . . he doesn't

TARRIO: Lol

LAMOND: That is true

LAMOND: Yesterday was a total shitshow

62. Later on January 7, 2021, using Telegram, LAMOND and Tarrio exchanged the following messages:

TARRIO: I have someone you guys might be looking for. [Person 7]. She had Maryland police go to her house yesterday.

TARRIO: She thinks they came because of the Capitol stuff.

LAMOND: Copy. Not that I'm aware of offhand but i will check

LAMOND: I know we are working on identifying a number of people

TARRIO: Let me know if she's on your list. I'll have her turn herself in

63. After receiving Tarrio's information about Person 7, LAMOND used his law enforcement contacts to obtain a list of individuals that the FBI had identified as subjects in the Federal Investigation. After receiving the list, on Telegram, LAMOND wrote to Tarrio, "Nope. Not on our list."

64. On January 8, 2021, using Telegram, LAMOND and Tarrio exchanged the following messages:

LAMOND: Looks like the feds are locking people up for rioting at the Capitol. I hope none of your guys were among them.

TARRIO: So far from what I'm seeing and hearing we're good

LAMOND: Great to hear. Of course I can't say it officially, but personally I support you all and don't want to see your group's name or reputation dragged through the mud

TARRIO: One of my guys did get arrested in Hawaii. But he was just in there behind people. Recorded the whole thing for his YouTube. No damage

TARRIO: Thanks but I think we're passed that . . . the brunt of this will come down on us.

TARRIO: Past\*

LAMOND: It's not going to matter. Simply entering the building will be enough to get charged. Being up on the upper terrace past the police lines may even be enough

TARRIO: Yeah I know. Will those be felonies?

LAMOND: Yes. 100%

TARRIO: What felony is it?

LAMOND: 18 USC 1752 – Restricted Building or Ground

*LAMOND Lied to and Misled USAO Investigators*

65. On June 2, 2021, when Federal Law Enforcement Officers 1 and 2 (USAO investigators) interviewed LAMOND about his contacts with Tarrío, LAMOND knowingly and willfully made several false and misleading statements to them, as described below.

66. When asked whether, in his conversations with Tarrío, it was common for Tarrío “to fish” for information, LAMOND responded, “No, not really. He never really asked me questions about, like, you know, what we were doing or anything. It was more, you know, one-sided with just him telling me, you know, what their plans were.” In fact, as LAMOND knew, since at least July 2020, LAMOND regularly provided sensitive law enforcement information to Tarrío.

67. When asked how he would typically communicate with Tarrío, LAMOND misleadingly stated, “[e]ither by phone, or I’m trying to think. Never by email. I can’t remember. I think sometimes it was by text, too. I don’t remember.” When then asked specifically whether LAMOND and Tarrío used Telegram or another encrypted messaging service, LAMOND

misleadingly stated, "I think Telegram, maybe?" In fact, as LAMOND knew, by November 2020, LAMOND and Tarrío communicated almost exclusively by Telegram.

68. When asked what LAMOND's conversations were like with Tarrío between the date of the BLM Banner Burning and Tarrío's arrest on January 4, 2021, LAMOND responded, "I was trying to find out, without tipping him off to the MPD investigation." In fact, as LAMOND knew, between the date of the BLM Banner Burning and January 4, 2021, LAMOND provided regular updates and information to Tarrío about the BLM Banner Burning Investigation.

69. Later in the interview, LAMOND falsely stated that after Tarrío publicly claimed responsibility for the BLM Banner Burning, LAMOND and Tarrío "ha[d] another conversation afterwards, but we didn't talk about the banner, or whether or not he did it." In fact, as LAMOND knew, Tarrío had indicated to LAMOND that Tarrío participated in the BLM Banner Burning.

70. When asked whether MPD's arrest plan for Tarrío in the BLM Banner Burning Investigation was to carry it out without notifying Tarrío in advance or to get Tarrío to turn himself in, LAMOND stated that he believed the plan was to carry out the arrest plan without notifying Tarrío and that "I know that I didn't, you know inform him that he had an arrest warrant." In fact, as LAMOND knew, he had informed Tarrío that MPD had an arrest warrant for Tarrío before MPD arrested him.

71. During the interview, LAMOND misleadingly stated that he had "one or two" conversations with Tarrío on January 6, 2021, or the day after, and that Tarrío had told LAMOND that Tarrío believed he could have stopped the January 6 Attack.

72. LAMOND did not disclose that Tarrío had identified to LAMOND an associate who was present at the U.S. Capitol on January 6 or that Tarrío had previously made comments about attending events in Washington, D.C. on January 6.

**COUNT ONE**  
**(Obstruction of Justice - D.C. Code § 22-722)**

73. Paragraphs 1 through 72 are incorporated herein.

74. On or about December 13, 2020, through on or about January 4, 2021, within the District of Columbia,

**SHANE LAMOND,**

willfully and knowingly, did corruptly obstruct and impede and endeavor to obstruct and impede the due administration of justice in an official proceeding, that is, the investigation and prosecution of destruction of property arising from the December 12, 2020, burning of a banner that read “#BLACKLIVESMATTER” in Washington, D.C.

(In violation of D.C. Code § 22-722 (Obstruction of Justice))

**COUNT TWO**  
**(False Statement - 18 U.S.C. § 1001(a)(2))**

75. Paragraphs 1 through 72 are incorporated herein.

76. On June 2, 2021, in the District of Columbia and elsewhere, the defendant,

**SHANE LAMOND,**

did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States; that is, in an interview conducted by federal law enforcement, LAMOND falsely stated that LAMOND’s relationship with Tarrío “was more, you know, one-sided with just him telling me, you know what their plans were,” when, in fact, as LAMOND knew, since at least July 2020, LAMOND had regularly provided Tarrío with confidential information about law enforcement activity.

(In violation of Title 18, United States Code, Section 1001(a)(2))

**COUNT THREE**

**(False Statement - 18 U.S.C. § 1001(a)(2))**

77. Paragraphs 1 through 72 are incorporated herein.

78. On June 2, 2021, in the District of Columbia and elsewhere, the defendant,

**SHANE LAMOND,**

did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States; that is, in an interview conducted by federal law enforcement, LAMOND falsely stated that LAMOND had tried to find out information from Tarrío about Tarrío's involvement in the December 12, 2020, destruction of the BLM Banner "without tipping him off to the MPD investigation," when, in fact, as LAMOND knew, LAMOND had provided regular updates and information to Tarrío about the BLM Banner Burning Investigation.

(In violation of Title 18, United States Code, Section 1001(a)(2))

**COUNT FOUR**

**(False Statement - 18 U.S.C. § 1001(a)(2))**

79. Paragraphs 1 through 72 are incorporated herein.

80. On June 2, 2021, in the District of Columbia and elsewhere, the defendant,

**SHANE LAMOND,**

did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States; that is, in an interview conducted by federal law enforcement, LAMOND falsely stated that LAMOND "didn't, you know, inform him that he had an arrest warrant" for Tarrío's participation in the December 12, 2020, destruction of the BLM Banner, when, in fact, as LAMOND knew, LAMOND had informed Tarrío that an arrest warrant had been issued for Tarrío.

(In violation of Title 18, United States Code, Section 1001(a)(2))

A TRUE BILL

FOREPERSON

*Matthew M. Graves/jpk*

MATTHEW M. GRAVES

ATTORNEY FOR THE UNITED STATES  
IN AND FOR THE DISTRICT OF COLUMBIA