Case: 1:23-mj-00153

Assigned to: Judge Meriweather, Robin M.

Assign Date: 5/23/2023

Description: COMPLAINT W/ ARREST WARRANT

STATEMENT OF FACTS

Your affiant is a Special Agent (SA) with the United States Secret Service "USSS" and has been since June 6, 2021. The USSS is responsible for conducting criminal investigations and protecting the President, Vice President, their families, and other members of the Executive branch. Currently, I am assigned as a sworn law enforcement officer of the Washington Field Office. In that capacity, my duties include investigating federal criminal offenses in the District of Colombia. During my tenure as a Criminal Investigator/Special Agent (SA), I have completed training at the Federal Law Enforcement Training Center in Glynco, Georgia (FLETC). Additionally, I have completed training at the JJ. Rowley Training Center. Prior to my tenure as a SA, I have assisted the United States Citizenship and Immigration Services as an Immigration Analyst and worked in their Fraud Detection and National Security Unit aiding them in preparing for various interviews and investigations.

I base the information in this Affidavit on my personal knowledge, training, experience, and information that I have learned from witnesses, records, and other law enforcement officers and agents. Additionally, unless otherwise indicated, conversations discussed herein are described in substance and in part rather than verbatim. Likewise, I have not included every fact that my investigation has revealed, but rather, have included only those facts necessary to show probable cause.

After reviewing documents and reports and speaking with multiple members of the law enforcement community, including the Federal Bureau of Investigation, the United States Park Police ("USPP"), and the Metropolitan Police Department, and based upon my firsthand knowledge investigating this incident, your affiant states as follows:

On Monday May 22, 2023, at approximately 9:35 p.m., a USPP officer patrolling in a stationary police vehicle near H Street, Northwest between 16th Street and Jackson Place, Northwest, observed an orange and white in color U-Haul box truck (the "U-Haul") traveling eastbound on H Street. The operator of the U-Haul, later identified to be Sai Varshith KANDULA, turned onto the H Street walking entrance to Lafayette Square, close to 16th Street. In doing so KANDULA drove onto the sidewalk, sending multiple pedestrians running from the scene. The USPP officer observed the U-Haul strike the metal bollard barriers that prevent vehicles from entering Layfette Square, north of the White House grounds. After striking the barriers, the U-haul backed up in reverse, and lurched forward, again striking the metal barriers.

The USPP officer engaged emergency lights, drove up behind the U-haul, and exited the vehicle to investigate. The officer noticed the vehicle was smoking from the front hood and liquids were leaking from the vehicle's undercarriage. At this point, the USPP officer watched KANDULA exit the driver's side of the vehicle and go to the back of the U-haul. The officer watched as KANDULA removed a red and white flag with a Nazi Swastika in the center from a black backpack he was carrying. At this point, the USPP officer ordered KANDULA down to the ground and detained him and searched him. On his person, a Missouri driver's license identification card was found, bearing the name Sai Varshith KANDULA. No explosives were found in the U-haul and no weapons or ammunition were found on KANDULA. KANDULA was taken into custody by the

USPP officer.

KANDULA was transported to a USPP station where he consented to an interview by agents of the USSS. In response to questioning, KANDULA told agents that he flew into Washington, D.C. from St. Louis at approximately 8:00 p.m. that evening on a one-way ticket. Upon arriving at Dulles International Airport, he rented a U-Haul from a nearby location and drove directly to the White House.

KANDULA stated his goal was to "get to the White House, seize power, and be put in charge of the nation". When agents asked how KANDULA would seize power, he stated he would "Kill the President if that's what I have to do and would hurt anyone that would stand in my way". KANDULA made clear in the interview that by "the President" he meant the President of the United States. KANDULA said he had been planning for six months.

KANDULA stated that his actions at the White House had been successful because his intention was to send a message to us. When asked what KANDULA meant by "us", KANDULA stated a message was meant to be sent to all organizations like the Secret Service. KANDULA added, "either way, whether I got into the White House or not, my message was received". KANDULA was asked if he knew how dangerous his actions were, and stated that he knew he would be arrested, but his "book" would get to those who needed to see it.

By "book" KANDULA said this referred to his "green book" which is an outlet for his thoughts. KANDULA stated he eventually started writing his plans to enter the White House, and what he would accomplish if he was in charge.

When asked about the flag he showed at the scene, Kandula stated it was a swastika. KANDULA stated he purchased the flag online, because "Nazi's have a great history". KANDULA was asked to elaborate on what he favors about the Nazi's, to which he stated that he admires their "authoritarian nature, Eugenics, and their one world order". When asked if he looks up to any leaders, KANDULA answered "Hitler, because he was a strong leader".

The damage caused by the U-Haul to the metal barriers, which are located at the intersection of H St. Northwest and 16th St. Northwest and constitute property of the United States Government, is more than \$1,000.00. The damage included impact damage to the barriers, requiring the need for an engineering inspection, scraping and paint loss that will require repainting, and cleanup of fluids leaked from the U-Haul after the vehicle was damaged by the impact. KANDULA's acts were calculated to influence or affect the conduct of government by intimidation or coercion, or to retaliate against government conduct.

Based on the foregoing, your affiant submits that there is probable cause to believe that KANDULA violated 18 U.S.C. § 1361, depredation of property of the United States in excess of \$1,000.

SPECIAL AGENT MARIAH S. HICKS

United States Secret Service

Attested to by the applicant in accordance w telephone on this 23rd day of May, 2023.	ith the requirements of Fed. R. Crim. P. 4.1 by
	The Honorable Robin M. Meriweather U.S. MAGISTRATE JUDGE