

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v
Robert Walter Jones,
DOB: XXXXXX
Karen Jane Jones,
DOB: XXXXXX

Defendant(s)

Case: 1:23-mj-00325
Assigned to: Judge Upadhyaya, Moxila A.
Assign Date: 11/28/2023
Description: COMPLAINT W/ ARREST WARRANT

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

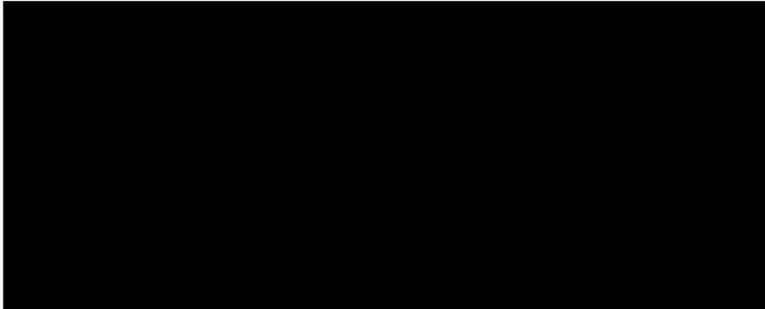
Offense Description

- 18 U.S.C. § 1752 a) 1) - Entering and Remaining in a Restricted Building or Grounds.
18 U.S.C. § 1752 a) 2) - Disorderly and Disruptive Conduct in a Restricted Building or Grounds,
40 U.S.C. § 5104 e) 2) D) - Disorderly Conduct in a Capitol Building or Grounds, and
40 U.S.C. § 5104 e) 2) G) - Parading, Demonstrating, or Picketing in a Capitol Building.

This criminal complaint is based on these facts:

See attached statement of facts.

Continued on the attached sheet.



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

Date: 11/28/2023

M. H. Upadhyaya (Signature)

Judge's signature

City and state: Washington, D.C.

Moxila A. Upadhyaya, U.S. Magistrate Judge
Printed name and title

## STATEMENT OF FACTS

Your affiant, [REDACTED] is a Special Agent with the Federal Bureau of Investigation (“FBI”) and has been so employed since December 2020. I am currently assigned as a Special Agent to the Los Angeles Field Office Joint Terrorism Task Force (“JTTF”) CT-3. In my duties as a Special Agent, I investigate violations of the laws of the United States, specifically investigations of domestic and foreign terrorism. As a Special Agent, I have received both formal and informal training from the FBI regarding criminal and domestic terrorism investigations. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, 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, DC. 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 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.

Two such individuals have been identified by the FBI as KAREN JANE JONES and ROBERT WALTER JONES of California. According to property records from the State of California, KAREN JONES and ROBERT JONES are spouses.

According to records obtained through a search warrant served on cellular service provider AT&T, two mobile devices associated with phone numbers registered to KAREN JONES were identified as having utilized a cell site consistent with providing service to a geographic area that included the interior of the United States Capitol Building on January 6, 2021. The phone numbers are identified herein by their last four digits: (1) – 0238 and (2) – 8104. Records obtained from AT&T show that the subscriber and financially responsible party for each phone number is KAREN JONES, as confirmed by her residential address.

According to records obtained through a search warrant served on cellular service provider AT&T, the phone number ending in -8104 was also associated with an email account hosted by Google, LLC, identified as “rwjonzie@gmail.com.” According to records obtained by Google, LLC, the email account belonged to a person listed as “R Jonzs.” The email account and the name of the account holder are consistent with ROBERT WALTER JONES’S name and initials, leading investigators to believe that the phone number listed as -8104 was utilized by ROBERT JONES, despite the account being in his wife’s name.

Moreover, FBI staff operations specialists conducted a telephone analysis of telephone selector (target number) -0238 for the time period between November 20, 2020 to January 30, 2021. The analysis of the toll data showed that -0238 had over 200 telephonic contacts with -8104 and more than 30 from January 3, 2021 to January 9, 2021. This further led investigators to believe the phones were being utilized by two different people, namely KAREN and ROBERT JONES.

According to airline records, both KAREN JONES and ROBERT JONES flew from Los Angeles, California, to Washington DC on January 5, 2021, and left Washington DC on January 8, 2021. Records from a travel services website, as well as credit card records show that KAREN JONES booked and paid for a hotel in Washington DC from January 5-8, 2021.

Investigators in this matter have reviewed opensource videos and closed circuit television (CCTV) surveillance from the United States Capitol from January 6, 2021. In reviewing opensource footage of the events of January 6, 2021, investigators observed a video, a still photograph of which is depicted below. In the video, a female, who self identifies as “Karen Jones,” participated in an “open mic” session on the East Steps of the United States Capitol Building.



*Fig. 1 – Still photo from opensource video of KAREN JONES (outlined in blue) on open mic on East Steps of U.S. Capitol on January 6, 2021.*

In the video, the woman wearing a dark colored ball cap with “TRUMP” in yellow lettering, a tan hooded sweatshirt with a black sweatshirt underneath, black pants, black fingerless gloves, with tan UGG boots and sometimes glasses, is handed a microphone on the East Steps of the Capitol and announces over a loudspeaker:

Hi, I’m Karen Jones. I’m from Calabasas, California – Home of the Reagan Ranch – and I’m very proud to be here. I was in the first wave up the stairs. I lucked out. Thank you to all the people who carried me in the crowd. Took a little pepper spray. I didn’t think I’d ever be sprayed by cops in my own country. I support the police, but I would like everyone to please join me in saying the Pledge of Allegiance.

During the course of this investigation, law enforcement has conducted physical surveillance of KAREN JONES at her residence in California. Law enforcement officers were further able to confirm that the Karen Jones depicted in Figure 1 is KAREN JONES.

Investigators further believe that KAREN JONES’S spouse, ROBERT WALTER JONES, accompanied her to the U.S. Capitol on January 6, 2021. This belief is based on the fact that both KAREN JONES and ROBERT JONES travelled together from California to Washington DC on January 5, 2021. Additionally, two phone numbers associated with KAREN JONES utilized a cell site consistent with providing service to a geographic area that included the interior of the United States Capitol Building that day.



Investigators reviewed known photos of ROBERT JONES, including his photo from the California Department of Motor Vehicles, photos from social media accounts, and photos from open source news articles. They then reviewed both open source videos and photographs of KAREN JONES from January 6, and observed a male in close proximity to KAREN JONES throughout the footage. The two appeared to be in close proximity and moved together through various areas on the Capitol grounds and building. The male was consistent with the known photographs of ROBERT JONES.

In videos and photographs, ROBERT JONES is depicted wearing a dark colored winter jacket with a hood, a dark colored neck gator, blue jeans, and glasses. In most of the videos, ROBERT JONES is also wearing a red, white, and blue knit hat with a pompom, a small emblem that says “45,” and the word, “Trump” in white letters.



*Fig. 2 (Left) – Still photo from opensource video of ROBERT JONES’S face with knit hat and “45” emblem from January 6, 2021.*

*Fig. 3(Right) – Still photo from opensource video of KAREN JONES and ROBERT JONES standing together on the East Steps of the U.S. Capitol on January 6, 2021.*

Opensource video footage shows that KAREN and ROBERT JONES approached the U.S. Capitol from the east side of the building where the perimeter establishing restricted grounds was set. After the perimeter was breached by protesters, KAREN and ROBERT JONES advanced with the crowd to the base of the east side steps of the U.S. Capitol building.



*Fig. 4 – Still photo from opensource video of KAREN and ROBERT JONES approaching the east side of the Capitol Building on January 6, 2021.*

Opensource footage further shows that KAREN JONES approached the base of the East Steps before the crowd pushed past the officers, and advanced up the stairs.





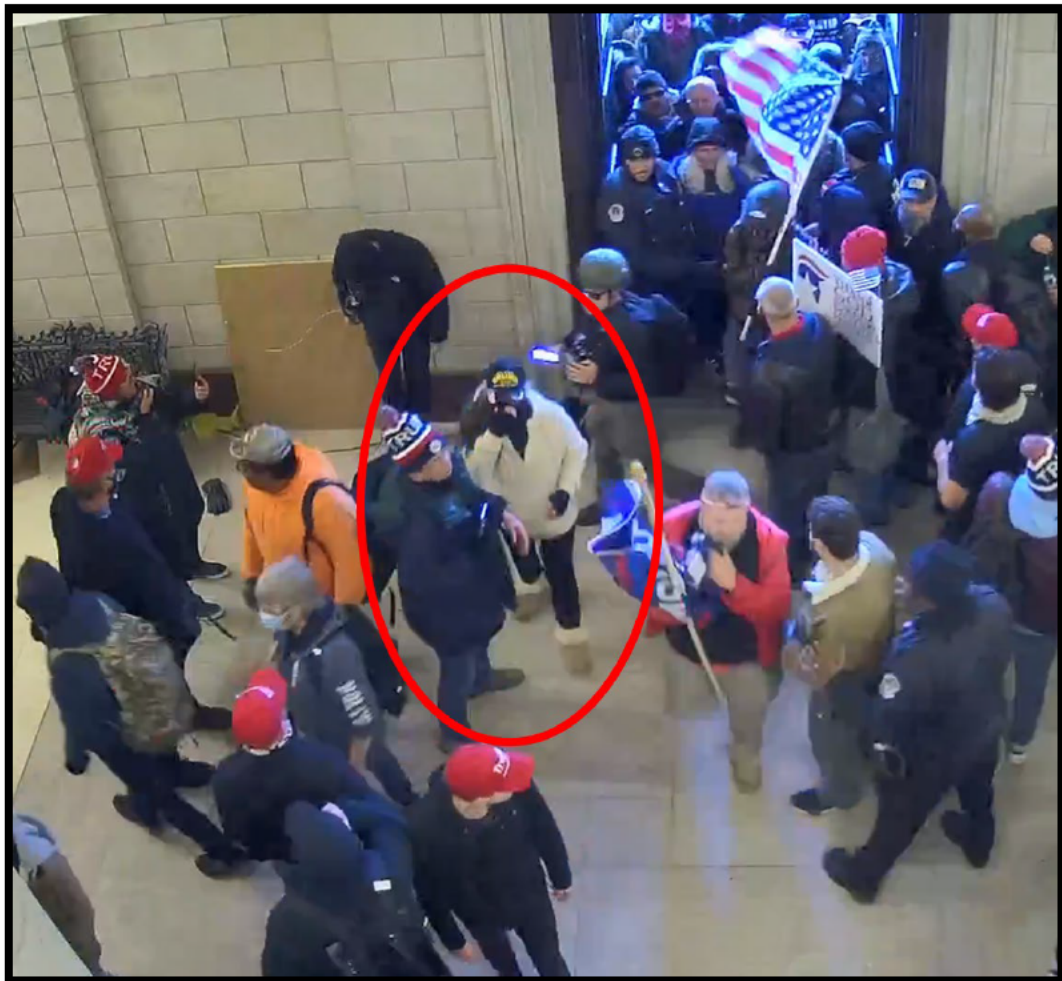
*Fig. 5 – Still photo from opensource video of KAREN JONES (outlined in blue box) approaching a line of police officers on the East Steps of the U.S. Capitol.*

A video obtained by FBI shows that KAREN JONES and ROBERT JONES then went up the East Stairs and stood near the pillars south of the Upper East Side main door, outside of the Capitol.



*Fig. 6 – Still photo from video of KAREN JONES and ROBERT JONES outside of East Doors of U.S. Capitol.*

According to CCTV footage, KAREN and ROBERT JONES entered the U.S. Capitol side-by-side through the East doors at approximately 3:01 p.m.



*Fig. 7 – Still photo from CCTV footage of KAREN and ROBERT JONES entering the U.S. Capitol at approximately 3:01 p.m.*

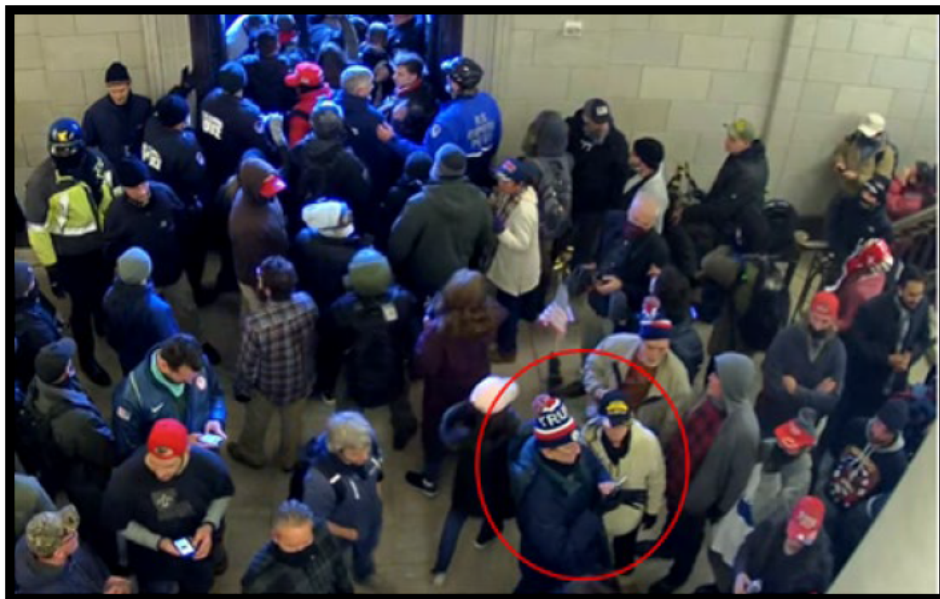
Shortly thereafter, KAREN and ROBERT JONES entered the Rotunda area.





*Fig. 8 – Still photo from CCTV of KAREN and ROBERT JONES walking through the Rotunda together shortly after 3:00 p.m.*

CCTV shows that while in the Rotunda, Capitol Police entered the area and directed protestors to leave. At approximately 3:12 p.m., KAREN and ROBERT JONES exited the Rotunda. They stayed in the Rotunda Lobby for some time talking to other individuals



*Fig. 9 – Still photo from CCTV of KAREN and ROBERT JONES in the Rotunda lobby, talking to other rioters before exiting the building.*

At approximately 3:28 p.m., KAREN and ROBERT JONES exited the U.S. Capitol via the Upper East Side doorway (same way they entered).



*Fig. 10 – Still photo from CCTV of KAREN and ROBERT JONES exiting the building.*

Based on the foregoing, your affiant submits that there is probable cause to believe that KAREN JANE JONES and ROBERT WALTER JONES 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 KAREN JANE JONES and ROBERT WALTER JONES violated 40 U.S.C. § 5104(e)(2)(D) and (G), (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.



Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by telephone, this 28th day of November 2023.

A handwritten signature in blue ink that reads "M. A. Upadhyaya". The signature is written over a circular official seal of the Federal Bureau of Investigation.

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MOXILA A. UPADHYAYA  
U.S. MAGISTRATE JUDGE