

AO 106A (08:18) Application for a Warrant by Telephone or Other Reliable Electronic Means

UNITED STATES DISTRICT COURT

for the
District of Idaho

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*

ALL ELECTRONIC DEVICES OUTLINED IN
ATTACHMENT A, CURRENTLY LOCATED AT 2155
WEST RIVERSTONE DRIVE, COEUR D'ALENE, ID 83814

Case No. 1: 22-mj-173-CWD

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A.

located in the _____ District of _____ Idaho _____, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371;	Conspiracy to Commit Offense or to Defraud United States;
18 U.S.C. § 2101	Conspiracy to Riot

The application is based on these facts:

See Affidavit in Support of a Application Under Rule 41 for a Warrant to Search and Seize.

- Continued on the attached sheet.
- Delayed notice of _____ days *(give exact ending date if more than 30 days)*; _____ is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Supervisory Special Agent _____ FBI
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Zoom *(specify reliable electronic means)*.

Date: 07/20/2022


Judge's signature

City and state: Boise, ID

Hon. Candy W. Dale, United States Magistrate Judge
Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

IN THE MATTER OF THE SEARCH OF
ALL ELECTRONIC DEVICES OUTLINED
IN ATTACHMENT A, CURRENTLY
LOCATED AT 2155 WEST RIVERSTONE
DRIVE, COEUR D'ALENE, ID 83814.

Case No. 1: 22-mj-173-CWD

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION UNDER RULE 41 FOR A
WARRANT TO SEARCH AND SEIZE**

I, [REDACTED] being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Supervisory Special Agent (“SSA”) with the Federal Bureau of Investigation (FBI) currently assigned to the Salt Lake City Division, Boise Resident Agency, and have been employed by the FBI since June 7, 2009. I am currently assigned to work national security matters, which encompasses domestic terrorism, international terrorism, weapons of mass destruction, cyber, and counterintelligence investigations. My law enforcement training includes the FBI Academy located at Quantico, Virginia, having received training in all matters related to criminal and national security investigations, including but not limited to evidence collection, search and arrest warrants, and criminal procedures. Prior to the FBI, I was active duty with the United States Air Force (USAF) and I currently serve in the USAF Reserves.

2. I make this Affidavit in support of an application pursuant to Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the electronic devices specified below and in Attachment A (the “Subject Devices”) for the items and information described in Attachment B.

3. This affidavit is based upon my personal knowledge; my review of documents and other evidence; my conversations with other law enforcement personnel; open-source research;

and my training and experience. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

IDENTIFICATION OF THE DEVICES TO BE SEARCHED

4. A description of the 35 subject devices (“Subject Devices”) are included below:
 - a. Black Apple iPhone bearing AT&T card number 8901280333 0287590300 6533c found on the person of GARRET JOSEPH GARLAND (hereinafter Device-1).
 - b. GoPro Camera bearing serial number C3281326969297 found on the person of GARRET JOSEPH GARLAND (hereinafter Device-2).
 - c. Black 7 GoPro Camera bearing serial number C3281326976910 found on the person of JUSTIN MICHAEL O’LEARY (hereinafter Device-3).
 - d. Insta360 with battery and cable bearing serial number 210159503 found on the person of DYLAN CARTER CORIO (hereinafter Device-4).
 - e. Panasonic Lumix Camera bearing serial number WE7SB001867 found in the U-Haul cab (hereinafter Device-5).
 - f. Cruiser Glide USB bearing serial number SD1260-0329 BM200357941W, Sandisk card bearing serial number BQ2022153508Y, Sandisk adapter, and gray key fob 22c700b found on the person of THOMAS RYAN ROUSSEAU (hereinafter collectively Device-6).
 - g. 1 Canon EOS Rebel SL3 bearing serial number 012070008334 found on the person of FORREST CLARK RANKIN (hereinafter Device-7).

- h. Black Google cellular telephone in Black Nylon Pouch bearing serial number 8901280432 0299014737, belonging to WESLEY EVAN VANHORN (hereinafter Device-8).
- i. Samsung cellular telephone bearing serial number R3CNCOH6TVH found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-9).
- j. Samsung cellular telephone bearing IMEI 354805091974331 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-10).
- k. Charcoal Apple iPhone with black case bearing sim card number 89148 00000 79848 41953 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-11).
- l. Red Apple iPhone with black case marked “UT” bearing T-Mobile sim card number 8901260134 712688251 60.70 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-12).
- m. Black Apple iPhone with black case marked “UTAH” bearing Verizon SIM card number 89148 00000 60482 68732 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-13).
- n. Black Apple iPhone bearing serial number 353012099082180 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-14).
- o. Black LG cellular telephone bearing serial number 002VTMU0105235 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-15).
- p. Dark blue/black Apple iPhone with black case marked “CO VAN” bearing T-Mobile card number 8901260012 750656135 60.70 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-16).

- q. Black Samsung cellular telephone with black case marked “ALEX CONRAD TX” bearing IMEI 356544765773517 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-17).
- r. Black Apple iPhone bearing serial number 357332095088858 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-18).
- s. Black Apple iPhone bearing serial number 353063107411564 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-19).
- t. Samsung Galaxy A12 cellular telephone bearing serial number 352945782708887 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-20).
- u. Silver Samsung Galaxy J3 cellular telephone with grey case “DAVID WA” found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-21).
- v. Blue Samsung Galaxy cellular telephone marked “UTAH” bearing IMEI 358496091082915 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-22).
- w. Black Apple iPhone bearing serial number 353247105398630 found on the person of COLTON MICHAEL BROWN (hereinafter Device-23).
- x. Black Apple iPhone bearing serial number 353058098256259 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-24).
- y. Blue Apple iPhone with black Pelican case bearing AT&T card number 8901280433 0380044576 6533C found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-25).
- z. Samsung LG S10 cellular telephone bearing IMEI 352810101817308 found on the person of NATHANIEL TAYLOR WHITFIELD (hereinafter Device-26).

- aa. Google cellular telephone bearing serial number 358275091541033 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-27).
 - bb. OnePlus cellular telephone bearing IMEI 1 number 869134049792796, IMEI 2 number 869134049792788, MEID 9900 157 100 7360 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-28).
 - cc. Samsung cellular telephone bearing IMEI number 356550755015629 found on the person of THOMAS RYAN ROUSSEAU (hereinafter Device-29).
 - dd. T-Mobile cellular telephone marked “CO VAN” bearing IMEI 015710000467339 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-30).
 - ee. Black Apple iPhone bearing serial number 354876507859713 found in red 2008 Toyota Camry WBVL9098 (hereinafter Device-31).
 - ff. White Google cellular telephone bearing Verizon SIM card number 89148 00000 62153 00938 found on the person of GRAHAM JONES WHITSON (hereinafter Device-32).
 - gg. Black Apple iPhone bearing SIM card number 89148 00000 75947 61294 found on the person of JUSTIN MICHAEL O'LEARY (hereinafter Device-33).
 - hh. Black/purple Motorola XT2117-1 cellular telephone bearing IMEI 356889112206657 found in the U-Haul cab (hereinafter Device-34).
 - ii. GoPro Camera bearing ANATEL number 04767 18-08441 and CONATEL number 2018 08-1-000401 found on the person of GRAHAM JONES WHITSON (hereinafter Device-35).
5. The Subject Devices were located at the Coeur d'Alene Police Department Evidence Storage Bay located at 3818 North Schreiber Way, Coeur d'Alene, Idaho, 83815, in the

District of Idaho. These devices were seized incident to arrest and pursuant to a search warrant issued in the District Court of the First Judicial District of the State of Idaho, in and for the County of Kootenai, by Idaho Magistrate Judge John A. Cafferty, on June 12, 2022. *See* Exhibit 1. In order to assist the state/local authorities with the exploitation of these devices, the Subject Devices were released to FBI custody on July 19, 2022 and are currently located at the FBI Coeur d'Alene Resident Agency located at 2155 West Riverstone Drive, Coeur d'Alene, Idaho, 83814, in the District of Idaho.

6. The applied-for warrants would authorize the forensic examination of the Subject Devices (further described in Attachment A) for the purpose of identifying and seizing the information and data particularly described in Attachment B.

SUBJECT OFFENSE

7. For the reasons detailed below, there is probable cause to believe that the Subject Devices contain evidence, fruits, and instrumentalities of the offense of Conspiring to Commit an Offense against the United States, in violation of Title 18, United States Code, Section 371, by Conspiring to violate the Anti-Riot Act, as proscribed by Title 18, United States Code, Section 2101 (the "Subject Offense").

8. For the purposes of this Affidavit, the Subject Offense is defined as:

a. Whoever travels in interstate or foreign commerce or uses any facility of interstate or foreign commerce, including, but not limited to, the mail, telegraph, telephone, radio, or television, with intent—

(1) to incite a riot; or

(2) to ~~organize, promote, encourage,~~ participate in, or carry on a riot;¹ or

(3) to commit any act of violence in furtherance of a riot; or

(4) to aid or abet any person in inciting or participating in or carrying on a riot or committing any act of violence in furtherance of a riot;

and who either during the course of any such travel or use or thereafter performs or attempts to perform any overt act for any purpose specified in subparagraphs [listed above]....

Shall be fined under this title, or imprisoned not more than five years, or both.

b. Further, 18 U.S.C. § 2102 defines a “riot” as:

(1) an act or acts of violence by one or more persons part of an assemblage of three or more persons, which act or acts shall constitute a clear and present danger of, or shall result in, damage or injury to the property of any other person or to the person of any other individual or;

(2) a threat or threats of the commission of an act or acts of violence by one or more persons part of an assemblage of three or more persons having, individually or collectively, the ability of immediate execution of such threat or threats, where the performance of the threatened act or acts of violence would constitute a clear and present danger of, or would result in, damage or injury to the property of any other person or to the person of any other individual.

9. Conspiracy to Commit an Offense against the United States pursuant to 18 U.S.C. § 371 reads as follows: If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.

¹ The Ninth Circuit held the terms “organize,” “promote,” and “encourage,” as used in 18 U.S.C. § 2101, are overbroad and unconstitutional. The Court also held those provisions were severable and, thus, the statute otherwise remains constitutional, including the phrases “to incite,” “participate in,” “carry on a riot,” or “to commit any act of violence in furtherance of a riot” or “aid or abet any person” in the same conduct. For purposes of this requested search warrant, the Government is not relying on the terms “organize,” “promote,” and “encourage.” *See United States v. Rundo*, 990 F.3d 709 (9th Cir. 2021).

SUMMARY OF PROBABLE CAUSE

10. On or about June 11, 2022, 31 men believed to be members of the “Patriot Front” traveled from 12 different states across the United States to meet in Coeur d’Alene, Idaho. There is probable cause to believe that these men traveled to Coeur d’Alene as part of a conspiracy to incite, participate in, or carry on a riot at or around the location of the Pride in the Park event, which took place at the City Park in downtown Coeur d’Alene on June 11, 2022.

11. According to the North Idaho Pride Alliance, which organizes the annual event to celebrate Pride Month, Pride in the Park is a family-friendly, community event celebrating diversity and aimed at building a stronger and more unified community. The Pride in the Park event offers food, entertainment, a family/children’s activity area, and booths representing community resources, Pride partners, local businesses, and handmade goods. The Pride in the Park event was organized to support the LGBTQIA+ community.

12. On June 11, 2022, a third-party civilian (“Caller-1”) observed the Patriot Front members getting into a U-Haul truck around 1:30 p.m. Caller-1 then called 911, during which Caller-1 described the Patriot Front members as “a little army.”² The local police stopped the U-Haul truck and effectuated an arrest of the 31 men around 1:45 p.m.

13. The Patriot Front members had concealed themselves in the cargo bed of a U-Haul truck. The men coordinated their clothing and appeared uniformly dressed, with Patriot Front

² The Patriot Front members were given directions via an Operations Plan (discussed below) on how to secure vehicles and when to arrive for drills that morning. Specifically, drills were to take place between 6 a.m. and 11 a.m. Members shared the locations of such activities by latitude and longitude coordinates. Based on my experience as a law enforcement officer, I know that people use electronic devices, like cellular phones, to plan and coordinate uniforms, dates, times, locations (by sending latitude and longitude coordinates), and other logistics relating to the Subject Offense.

patches, balaclavas/masks and sunglasses that obscured their identity, shin guards, and hard plastic inserts in their baseball caps. They were outfitted with three-foot metal riot shields, 10-foot flag poles made from metal conduit, a smoke grenade, and a tactical medical kit containing a tourniquet and bandages, which leads to the logical inference that these members were intending to incite, participate in, or carry on a riot, or act of violence in furtherance of a riot, at the Pride in the Park event.

14. Following the arrests, law enforcement searched all 31 individuals and conducted an inventory search of the U-Haul and other vehicles. In doing so, law enforcement found a military-style Operations Plan. *See* Exhibit 2. The Operations Plan stated the 31 members should “form on the outskirts of the park and proceed inwards until barriers to approach are met” and anticipates a “confrontational dynamic” that may require the use of smoke grenades and potentially an “exfiltration” to remove the group once their mission was accomplished.

15. The Operations Plan states: “We are here to raise a voice against the moral depravity which permits events such as this to take place, against the predatory acts of homosexuals determined to tear down the pillars of civil society. These obscene acts perpetrated by drug addled freaks must not be given tolerance to undermine the safety and integrity of American communities.” The Operations Plan further states: “Any man who dares to claim a shred of dignity is now under an undeniable obligation to stand up to this gruesome attempt to turn his community, his nation with a proud history, into a deranged whorehouse.”

16. The Patriot Front is known to use online encrypted applications and, given the coordination of 31 individuals arriving in Coeur d’Alene from 12 states, likely used encrypted applications on their cellular telephones to coordinate their actions on or about June 11, 2022. The group also has a history of recording their actions and posting videos and photos on social media,

which likely is accomplished by using the camera feature on their cellular phones and other camera devices found at the time of their arrest by local authorities. Based on their coordinated efforts, riot gear, travel to Idaho, and Operations Plan, there is probable cause to believe there is evidence on the Subject Devices relating to the members of the Patriot Front having conspired to incite, participate in, or carry on a riot, or act of violence in furtherance of a riot.

PROBABLE CAUSE

Patriot Front

17. Based on my training and experience, review of law enforcement reports and open source information, and conversations with other law enforcement officers participating in this investigation, I know the following to be true and accurate:

18. The Patriot Front is a U.S.-based group of self-identified “American Fascists,” whose stated goal is to create a “union of Americans building the future” and to “reclaim America.” To that end, Patriot Front members encourage acts of vandalism to spread their ideology and engage in protests and counter-protests with the likely consequence of sparking violent confrontations with opposition groups. Members of Patriot Front have routinely targeted ethnic, religious, and societal minorities in a demonstrated effort to intimidate members of those groups. Patriot Front members affix and paint its propaganda to properties, and Patriot Front members deface and steal religious and socially inclusive signs and banners.

19. Patriot Front traces its origins to a now-defunct group known as Vanguard America. Vanguard America was one of the groups that participated in the “Unite the Right” rally, which took place in August 2017 in Charlottesville, Virginia. The rally participants included white extremist groups, some of whom chanted “blood and soil” and “Jews will not replace us,” as well as counter-protestors.” During the rally, one of the individuals affiliated with Vanguard

America—James Alex Fields, Jr.—rammed his vehicle into a group of counter-protestors, murdering Heather Heyer, and seriously injuring 19 other people; Fields was convicted of first-degree murder and other crimes, and Fields was sentenced to life in prison plus 419 years. In the aftermath of the murder, Vanguard America attempted to distance itself from Fields, claiming Fields was not a member of the group. However, Fields was photographed in Charlottesville the day of the attack holding a shield with the same logo as other shields held by members of Vanguard America, standing in a shield line with other Vanguard America members, and wearing attire similar to other Vanguard America members. The below picture shows Fields on the right side of the photograph (in the yellow circle) standing near Thomas ROUSSEAU on the left side of the photograph (in the red circle).



20. Shortly after the attack at the “Unite the Right” rally, on August 30, 2017, ROUSSEAU, one of the individuals who was present in the U-Haul truck in Coeur d’Alene, Idaho, on June 11, 2022, and a member of Vanguard America, announced that “Vanguard America, as you know it, will now be the ‘Patriots Front.’” In his role as the leader of Patriot Front, ROUSSEAU shortened the name to “Patriot Front,” which is the name the group uses today.

21. The Patriot Front hosts websites and social media accounts, which it uses to, among other things, recruit new members. The website (www.patriotfront.us) contains a copy of its “manifesto,” as well as a link that allows others to “join” the Patriot Front. The application process specifically asks applicants whether they read the manifesto. The manifesto, in part, sets forth the organization’s goals of overthrowing the United States Government: “Our mission is a hard reset on the nation we see today”; “To form a new and just State”; “THE NEW AMERICAN NATION STATE”; “The hard truth of the coming struggle is that America, as we know it, is already dead or will not survive. This age of our people will instead be seen as an era of rebirth and the beginning of a new chapter in history.”

22. The Patriot Front website highlights its activities depicting violence, vandalism, and clashes with law enforcement (among other activity, some of which is protected by the First Amendment). The website highlights the group’s “activist” actions executed in approximately 24 cities across the United States since 2017. While there are many videos on the Patriot Front website, one video on this website entitled “OCCUPYING THE OCCUPANTS” captures members of Patriot Front engaged in violence. This 3-minute-14-second video with background music, dated July 28, 2018, contains the description, “Activists confronted assorted enemies of the nation which had created a makeshift campsite outside of an ICE detention facility to impede the efforts of officers seeking to process and deport criminal aliens from the country.” This video

shows what appears to be Thomas ROUSSEAU accompanied by approximately eight other individuals wearing baseball caps, gloves, white face masks, sunglasses, “Reclaim America” shirts, and some carrying long metal flagpoles. After exiting their vehicles and led by ROUSSEAU with a bullhorn, the group aggressively walked up to individuals within a small temporary encampment chanting “strong nation, strong borders.” ROUSSEAU and his companions immediately began throwing chairs, kicking buckets, knocking down tents, and throwing protest signs, flags, boxes, and other property from within the encampment. While engaging in this property damage, the group deployed orange smoke directly into the camp and one member of the group was seen holding an ignited road flair. Individuals from inside the encampment appeared to look on helplessly. The video concludes with comments from one of these individuals who stated, “We were attacked by Patriot Front.” The Patriot Front website also includes multiple video clips that appear to capture members of Patriot Front participating in violent confrontations with counter-protestors where Patriot Front members use their shields to push others away from the group.

23. Patriot Front leaders and members have conducted offensive tactical training likely for the purpose of preparing Patriot Front members for violent encounters. The trainings include boxing, grappling, weapons training, tactical medical training, and chemical and biological weapons training. The Patriot Front has posted to its website and social media accounts videos of its members engaged in training and combat exercises. In one example, a 2022 video depicts members of the Patriot Front engaged in military-type drills, such as using riot shields to move in formation. Members are often seen wearing similar clothing—including white facemasks—and the online videos often use digital effects to blur faces, thereby preventing law enforcement from identifying participants.

24. In terms of communication, Patriot Front members are located in multiple states, and they use encrypted messaging applications and social media platforms to coordinate their activities. During initiation into the group, Patriot Front members are given a disclaimer that Patriot Front does not promote illegal violence or activity. However, Patriot Front members talk about the following topics on encrypted platforms: that raping women is acceptable, “as long as you’re raping, like, people in your own race,” “ethnostate rape gangs” would be allowed to freely target unmarried women who did not adhere to “traditional values,” their hatred of Jewish people, the murder of Heather Heyer, “white Sharia,” and operational security. Patriot Front members also share pictures of themselves wrestling, boxing, sparring, and shooting, which they refer to as “violence training.” The Patriot Front website also posted an approximate 2-minute-14-second video containing snapshots of violent confrontations (including confrontations with law enforcement), the defacement of property, the burning of an LGBTQIA+ rainbow flag, coupled with images of Patriot Front members marching, posting Patriot Front propaganda, and other activities while being set to music.³

PRIDE IN THE PARK

25. As set forth in more detail below, based on my familiarity with the investigation, including information that I obtained from conversations with law enforcement personnel; my review of documents and reports relating to this investigation; database searches; public reporting; and internet websites, I have learned the following:

26. On or about Saturday, June 11, 2022, an event called “Pride in the Park 2022” took place in Coeur d’Alene, Idaho. The event was organized by the North Idaho Pride Alliance, which,

³ This 2-minute-14-second video was found at patriotfront.us as recently as July 14, 2022.

according to its website, “is an organization of Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, Intersex and Allied (LGBTQIA+) people and community groups working together to create a unified north Idaho.” A save the date announcement for this event was posted to the North Idaho Pride Alliance’s Facebook and Instagram accounts and in their newsletter on February 25, 2022. The event was advertised as a “FREE family-friendly, community event celebrating diversity and building a stronger and more unified community for ALL,” and was to include “food, entertainment, activities, crafts, and 60+ booths” in the vicinity of the Coeur d’Alene City Park and Bandshell. The event organizers noted that members of its group had been “targeted in North Idaho within the last two years,” and that the event was designed to “stand in solidarity” with LGBTQIA+ people. According to the North Idaho Pride Alliance, the event on June 11, 2022, drew the biggest crowd they had seen in six years.

27. Law enforcement became aware of multiple organizations preparing operations designed to target, threaten, and intimidate members of the Pride in the Park event. These “operations” included militia-type groups dressing in similar clothing, wearing protective gear, and carrying firearms. The groups expressed the intent to engage in protests with the deliberate purpose of confronting and potentially sparking violent confrontations with opposition groups within the LGBTQIA+ community. For example, an advocate for protestors organizing a concurrent Gun d’Alene event stated words to the effect of, “We intend to go head to head with these people, damn the repercussions, let’s go to the fight, our group is GunD alene and we shifted our day specifically to go head to head. We are busy 6 days a week, leave your homes and come with us and come stand.”

28. Local law enforcement was aware of potential threats to the Pride in the Park event, and on the morning of June 11, 2022, the Coeur d’Alene Police Department (CPD) stood up a joint

Command Post to coordinate law enforcement activities and monitor for threats of violence or other violations of law.

29. The Pride in the Park event was well attended, with estimates of approximately 700 people present at the height of the event. There were many families and young children present at the event. The event was touted as a peaceful community event at the City of Coeur d'Alene park. See pictures from that day found on social media:



U-HAUL TIP AND STOP

30. At approximately 1:40 p.m. on June 11, 2022, Caller-1 called 911 and reported, in sum and substance, that Caller-1 had observed approximately 20 individuals getting into the cargo area of a U-Haul truck in the vicinity of a particular hotel in Coeur d'Alene, Idaho ("Hotel-1"). Caller-1 further stated the group was wearing masks, dressed in similar clothing, and equipped with shields and other objects. Caller-1 described the individuals as appearing "like a little army."

31. In response to this information, ISP, CPD, and SWAT Units were tasked with attempting to locate the U-Haul and to respond to the scene of Hotel-1. According to one of the CPD officers ("Officer-1") who responded to Hotel-1, one of the individuals believed to be a part of the group was observed communicating via a two-way radio from the Hotel-1 parking lot.

32. An ISP Trooper ("Trooper-1") observed a U-Haul approximately two miles from Hotel-1, in the vicinity of the Pride in the Park event, and Trooper-1 conducted an investigative stop. After additional law enforcement arrived at the scene, the rear door of the U-Haul was opened and a total of 31 individuals were removed from the U-Haul vehicle and placed under arrest for Criminal Conspiracy to Commit Riot under Idaho Code § 18-1701.

33. The 31 individuals ("Target Subjects") were booked at the Kootenai County jail. During the booking process, the 31 individuals were identified as the following:

- a. Garret Joseph GARLAND, who resides in Illinois;
- b. Devin Wayne CENTER, who resides in Arkansas;
- c. Wesley Evan VANHORN, who resides in Alabama;
- d. Dylan Carter CORIO, who resides in Wyoming;
- e. Lawrence Alexander NORMAN, who resides in Oregon;
- f. Richard Jacob JESSOP and Winston Worth DURHAM, who reside in Idaho;

- g. Conor James RYAN, Forrest Clark RANKIN, and Nathanael David BRENNER, who reside in Colorado;
- h. Mitchell Frederick WAGNER, who resides in Missouri;
- i. Derek Joseph SMITH and James Michael JOHNSON, who reside in South Dakota;
- j. Colton Michael BROWN, James Julius JOHNSON, Justin Michael O'LEARY, Mishael Joshua BUSTER, and Spencer Thomas SIMPSON, all of whom who reside in Washington;
- k. Alexander Nicholai SISENSTEIN, Branden Mitchel HANEY, Cameron Kathan PRUITT, Dakota Ray TABLER, Jared Michael BOYCE, and Nathaniel Taylor WHITFIELD, all of whom reside in Utah; and
- l. Thomas Ryan ROUSSEAU, Connor Patrick MORAN, Graham Jones WHITSON, Josiah Daniel BUSTER, Kieran Pdraig MORRIS, Robert Alden Benjamin WHITTED, and Steven Derrick TUCKER, all of whom reside in Texas. As noted above, ROUSSEAU is the founder and leader of the Patriot Front.
- m. At the time of their arrest, the Target Subjects wore similar clothing, consisting of blue shirts and tan pants, together with hats, white face masks, and sunglasses; the items appeared designed to obfuscate their identities. Several of the Target Subjects carried stacks of "Patriot Front" stickers, flyers and propaganda, and several individuals wore a "Patriot Front" patch or insignia on their clothing. The Coeur d'Alene police report relating to the arrest stated the Patriot Front members were equipped in a way that "was similar in nature to . . . law enforcement riot control equipment utilized when we are anticipating a physical altercation." The pictures

below depict the clothing worn by Patriot Front members on June 11, 2022, in Coeur d'Alene.



34. In addition, many of the Target Subjects wore protective gear. Several subjects wore plastic knee and/or shin guards and many of their baseball caps had a rigid plastic piece inserted to protect against head injury. The baseball caps were adorned with the Patriot Front logo on the front with several bearing a patch on the back. The patches varied in their message. At least three hats were adorned with a patch stating, “Victory or Death,” as depicted below. Other hats stated, “Our Tradition is Revolution” and “Reclaim America.” This is consistent with the Patriot Front website, which prominently displays these messages and others such as “Conquer or Die” on its members baseball caps. The pictures below depict one of the baseball caps seized as well as one of the hard inserts for the baseball caps used by Patriot Front members.



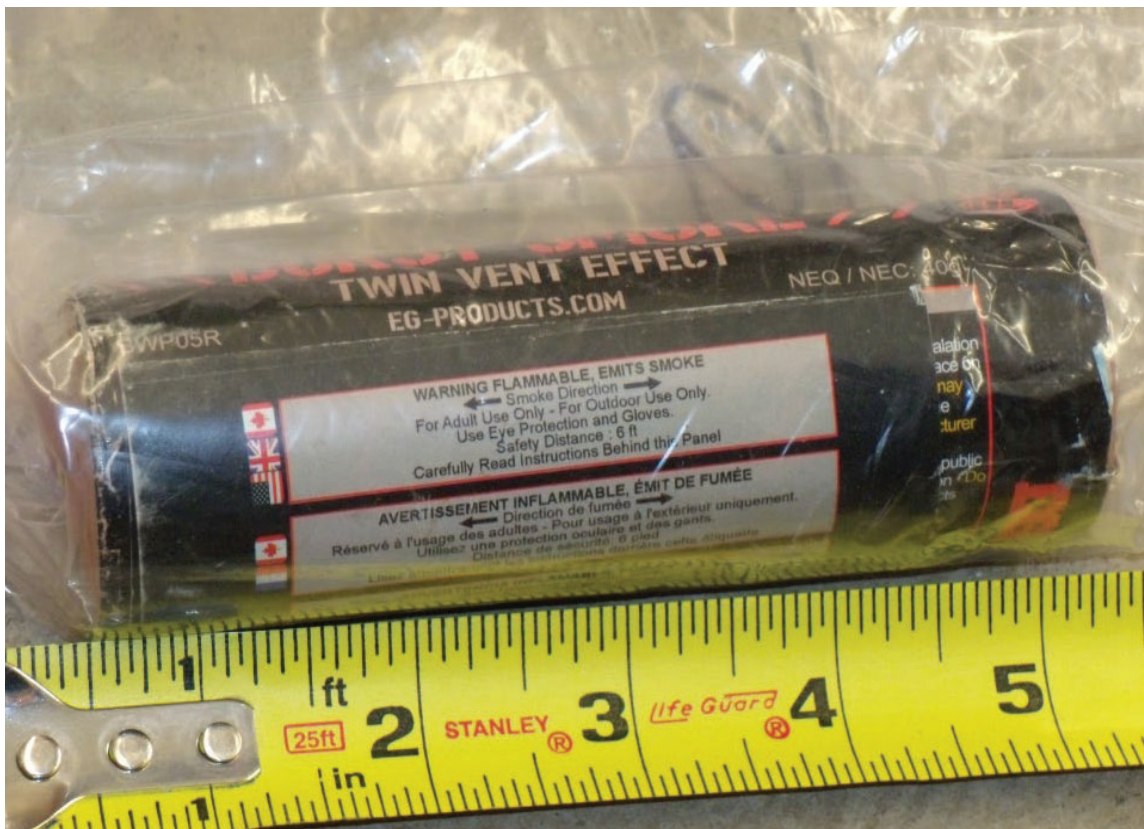


35. The Target Subjects also possessed large metal shields measuring approximately 3 feet in length and 18 inches wide, flags attached to 10-foot-long metal conduits, and voice amplification type devices. Significantly, the group also carried a tactical medical kit which included a tourniquet, bandages, tape, scissors, and a marker.





36. The Target Subjects also possessed a smoke grenade. Pursuant to the Operations Plan recovered from the U-Haul, the grenade was to be used during the Pride in the Park event at the discretion of Patriot Front members. The smoke grenade states it is “Flammable” and harmful to eyes and hands without proper precautions being taken. The Patriot Front website shows members using smoke bombs at other events they attend.



37. In addition, many of the Target Subjects carried cellular phones, digital cameras, and other digital recording devices, such as “Go Pro” recorders, as well as two-way radios and other items. These devices and items were seized incident to arrest. See paragraph 4 above entitled “IDENTIFICATION OF THE DEVICES TO BE SEARCHED” as it sets forth the specific devices seized from the various 31 individuals.

38. Of note, a LGBTQIA+ rainbow flag was found as part of the search conducted on June 11, 2022. See below:



39. As noted above, a typed, three-page document, which based on my training and experience appeared to be an “Operations Plan,” was recovered. *See* Exhibit 2. The Operations Plan began by describing specific actions members should take; for instance, the first line states **“Driver Team Departs: 5:30 a.m.** John, Ethan, Jack leave to procure two vehicles. Either flatbeds or cargo vans.” The Operations Plan further directed that “all arrive by” a set time on Saturday, June 11, and the Operations Plan included specific latitudinal and longitudinal coordinates for “lodging,” “CHECKPOINT” locations and the “Drop Site,” which corresponded to the Pride in the Park location. The Operations Plan detailed the following (*see* Exhibit 2):

- Drill: 6 a.m. – 11 a.m.
- Prep For Transit: 11 a.m. – 12 noon
- Transit: 12 noon – 1 p.m.
- Observation Window: 1 pm. – 2 p.m.
- Entry Upon Observation.

40. According to the Operations Plan, the individuals were instructed to proceed in the transport vehicles to the “drop site;” to form a column on the “outskirts of the park and proceed

inwards until barriers to approach are met,” at which point a “speech will be given and flyers distributed.” The Operations Plan specifically instructed that “[s]moke will be used at the discretion of the column coordinators” and that, “[o]nce an appropriate amount of time and confrontational dynamic has been established,” the column would go to a particular location. The Operations Plan further directed what the group must do in the event that “exfil” did not proceed as planned.

41. The last page of the Operations Plan stated, among other things, that the individuals were “here to raise a voice against the moral depravity which permits events such as this to take place, against the predatory acts of homosexuals determined to tear down the pillars of civil society.”

42. Following the arrest of the Target Subjects, the U-Haul and its contents were taken into CPD custody.

VEHICLE INVENTORIES

43. In addition to the information provided during the 911 call, Caller-1 later advised CPD that Caller-1 had observed a red Camry⁴ in the parking lot of Hotel-1, which contained a male who appeared to be using a radio to communicate with those in the U-Haul. Law enforcement later observed both a red Camry and a Ford Ranger in the parking lot of Hotel-1; both vehicles bore Washington State license plates, and both vehicles had items of clothing bearing the “Patriot Front” insignia observable from outside the vehicles.

⁴ CPD initially understood Caller-1 to be saying “red Camaro”; Caller-1 subsequently clarified that Caller-1 had described a red Camry, not a Camaro.

44. The U-Haul, Toyota Camry, and Ford Ranger subsequently were seized and searched as authorized by a warrant issued in the District Court of the First Judicial District of the State of Idaho, in and for the County of Kootenai. From reviewing photographs taken of the vehicles, as well as an inventory and property summary of the items found therein, I am aware that, among other things, the following items were recovered:⁵

a. U-Haul

- i. (15) Metal shields w/ same design scheme
- ii. (6) Flags with guidons
- iii. (1) Strong Families banner
- iv. (2) Round plexiglass shields
- v. (1) Lumix digital camera*
- vi. (1) Motorola Black Cell phone*
- vii. (1) BAOFENG radio marked NW1
- viii. (1) microphone pack taped to (1) transmitter w/ earpiece and mic accessory
- ix. (2) bullhorns

b. Toyota Camry

- i. Duct tape
- ii. Mouth guard
- iii. (2) BAOFENG Black radios
- iv. Tan hat with insignia

⁵ The Government is only requesting to search those items as set forth in paragraph 4 entitled "IDENTIFICATION OF THE DEVICES TO BE SEARCHED." The electronic devices above with an asterisk (*) are included within paragraph 4.

- v. Blue jacket
 - vi. (1) Black iPhone*
 - vii. (8) Banners
 - viii. Multiple flyers
 - ix. Two (2) facemasks
 - x. (2) Cellular telephones wrapped in foil*
 - xi. Faraday Bag containing nine (9) cellular telephones*
 - xii. Tupperware wrapped in foil containing nine (9) cellular telephones*
 - xiii. Radio charger
 - xiv. Miscellaneous Patriot Front propaganda.
- c. Ford Ranger
- i. (5) metal shields
 - ii. Black Lives Matter flag
 - iii. Patriot Front stickers
 - iv. Tan hat
 - v. (2) Blue jackets

45. In addition to the cellular phones seized from the Target Subjects, there were 20 additional cellular phones seized from the two vehicles discussed above. Two of these cellular telephones were wrapped in tin foil, 9 of the cellular phones were placed in Tupperware lined with tin foil, and 9 cellular telephones were placed in a faraday bag. A faraday bag may be used to block radio signals ranging from Wi-Fi, Bluetooth devices, and GPS devices. Based on my training and experience, individuals that wrap their cellular telephones in tin foil do so for the purpose of creating a makeshift faraday bag and blocking any sort of transmission to and from the

devices. In my training and experience, I know that individuals who engage in operational security often turn off cellular devices or otherwise take actions to prevent the transmission of signals to and from the cellular devices. I also know that Patriot Front members engage in operational security.



PATRIOT FRONT MEMBERS RELEASE VIDEO OF JUNE 11, 2022 AFTER ARRESTS

46. On or about June 16, 2022, after the Patriot Front members were released from custody, a new video was posted to the Patriot Front website. This video appears to depict events occurring on Saturday, June 11, 2022. Specifically, a group dressed in khaki pants and hats with blue shirts and white facemasks is observed loading into the back of a U-Haul at approximately 1:38 p.m. on June 11, 2022. Based upon my review of the video, it appears that it was created for propaganda purposes and legal defense arguments. It is an edited video and does not capture all of the events and conversations that took place that day.

47. An individual is heard stating: “Also, keep in mind that being in the center of a park at an event like this with weak-willed opposition that will be heckling at most, there’s not going to be any opportunity for getting testy with...physical responses, so mind your P’s and Q’s... Purely defensive.”

48. Another individual can be heard stating: “Remember guys, most importantly, remain calm. At all times. Stay collected”

49. An individual is heard stating: “Reminder to keep your mouth shut. We make more of an impactful response by our discipline and silence than by epithets...”

50. Later in the video a voice on a radio can be heard stating: “We’re being pulled over, stay calm”

51. An individual can be heard delivering instructions to the group while handcuffed: “The only thing you should be telling them is name, date of birth, and you are an activist wishing to peaceably assemble. That’s the only thing you tell them.”

PATRIOT FRONT MEMBERS INVOLVED IN ALTERCATION IN BOSTON

52. On July 2, 2022, according to an open-source publication, about 100 people appearing associated with the Patriot Front marched through downtown Boston, Massachusetts, carrying shields, American Flags, as well as flags on poles bearing the group’s emblem. I understand that ROUSSEAU was among the Patriot Front members present during the march in Boston.



53. Law enforcement became aware that a group of protesters were marching through Boston. Many of the marchers wore khaki pants and dark-colored polo shirts, with cloth coverings over their lower faces, along with sunglasses and caps. During the march through Boston which included members carrying flagpoles and shields, several of the marchers engaged in an altercation with a Black male. Based on the offense/incident report provided by Boston Police Department, the Black male sustained a laceration to his right ring finger and smaller lacerations to his head and left eyebrow.

OPERATIONAL TACTICS

54. Based on my training and experience, as well as my familiarity with Racially Motivated Violent Extremists (RMVEs), Anti-Government/Anti-Authority Violent Extremists (AGAAVEs), and other groups that engage in rioting and civil disorder, I am aware that smoke bombs are often used by individuals engaged in rioting and civil disorder, as that such bombs release significant quantities of obscuring smoke. That smoke may serve multiple purposes, such as causing fear and panic among those who are unaware of the smoke's origins and hiding the

movements and actions of the persons deploying the smoke bomb. In my training and experience, smoke bombs, when used in a crowd of people, cause panic and can result in injuries as individuals attempt to flee for safety.

55. Based on my training and experience, I believe that Patriot Front members dressed in anti-riot gear and carried metal shields to protect themselves during physical confrontation.

56. Based on my training and experience, I believe that “exfil” refers to exfiltration, a term commonly used by military personnel in reference to a person or object being securely removed from a hostile or dangerous situation.

57. The Operations Plan begins by providing instructions to “John, Ethan, Jack.” However, none of the 31 Target Subjects arrested on June 11, 2022, are named John, Ethan, or Jack; therefore, there is reason to believe that others participated in planning and coordinating to incite, participate in, or carry on a riot, or act of violence in furtherance of a riot at the Pride in the Park 2022 event.

58. Based on my training and experience, as well as my familiarity with RMVEs, AGAAVEs, and other groups that engage in rioting and civil disorder, I am aware that metal shields and poles can and have been used as offensive weapons to attack other people. For example, according to the United States Capitol Police, on January 6, 2021, during the insurrection and the riots at the United States Capitol in Washington, D.C., individuals used “(c)ommon things [] as weapons, like a baseball bat, a hockey stick, a rebar, a flagpole—including the American flag—pepper spray, bear spray.” Many of these individuals also used shields as weapons and as battering rams to destroy, among other things, windows.

THE DEVICES TO BE SEARCHED

59. Based on my training, experience, and research, I know that Subject Devices 1 and 8-34 are cellular telephones. Cellular telephones have capabilities that allow them to serve as handheld wireless devices used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A cellular telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, cellular telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic address books; sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing photographs and video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Cellular telephones also may include global positioning system (“GPS”) technology for determining the location of the device.

60. Based on my training, experience, and research, I know that cellular telephones have capabilities that allow them to serve as a wireless telephone, digital camera, portable media player, and GPS navigation device. In my training and experience, examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device.

61. Based on my training, experience, and research, I know that digital cameras, have the ability to record pictures as digital picture files and videos, rather than by using photographic film. Digital cameras use a variety of fixed and removable storage media to store their recorded images. Moreover, the images themselves are often coded with “metadata” such as the date, time, and location (via GPS) where the image was recorded. Images can usually be retrieved by

connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

62. Based on my training, experience, and research, I know that GoPro devices have their own memory storage function, often in the form of an SD Card or similar removable digital storage device. Similar to the devices above, they have the ability to record and maintain pictures as digital picture files and videos, rather than by using photographic film. The images themselves are often coded with “metadata” such as the date, time, and location (via GPS) where the image was recorded. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

63. Based on my training, experience, and research, I know that digital recording devices, Sandisc SD cards and USB devices function as digital storage. Like the devices above, they have the ability to maintain data and files including documents, pictures as digital picture files and video images. This data can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. I have learned that removable storage electronic devices, flash memory cards, SD cards, USB devices or miniature hard drives may contain information about criminal conduct.

64. As noted above, the Target Subjects reside in 12 different states. Accordingly, there is probable cause to believe that electronic devices, like the Target Subjects’ cellular phones, were

used to plan and coordinate uniforms, dates, times, locations, and other logistics relating to the Subject Offense. During the course of your affiant's years in law enforcement, I have learned that electronic devices, such as cell phones, smart phones, and tablets may contain information about criminal conduct. I am aware that these devices often have a default setting, which has the capability to show the travel history of the owner/user during a certain period. Based upon my experience, I am also aware that individuals often communicate with others during the planning stages of a crime via text messages or email and to relay the results of their criminal activity. Often, individuals will take pictures of themselves with the fruits of their illicit activities or to demonstrate their participation in an event. Specifically, individuals use their electronic devices to conduct research, share information, and relay surveillance details to coordinate activities and provide real-time information relevant to their events. Additionally, Patriot Front members have been known to document and record video evidence of both planning and preparation for participation in events for the purpose of later creating video propaganda for their websites. Patriot Front members did just that when they posted a video to their website on June 16, 2022.

65. The Subject Devices are currently in storage at the FBI Coeur d'Alene Resident Agency located at 2155 West Riverstone Drive, Coeur d'Alene, Idaho, 83814, in the District of Idaho. In my training and experience, I know that the Subject Devices have been stored in a manner in which their contents are, to the extent material to this investigation, in substantially the same state as they were when the Subject Devices first came into the possession of the Coeur d'Alene Police Department.

66. As described above, there is evidence that the Target Subjects had in their possession, or in their vehicles, the Subject Devices on June 11, 2022, and the Subject Devices

were recovered by law enforcement at the time of the arrest of the Target Subjects or shortly thereafter.

67. Moreover, many adults in the United States use mobile digital devices. The Pew Research Center for Internet & Technology estimated on April 7, 2021, that 97% of Americans owned at least one cellular phone, and that 85% of Americans use at least one smartphone. *See* Mobile Fact Sheet, <https://www.pewresearch.org/internet/fact-sheet/mobile/> (last visited July 14, 2022).

68. In addition, in my training and experience, it is common for individuals to back up or preserve copies of digital media (such as photos and videos) across multiple devices to prevent loss. Indeed, some companies provide services that seamlessly sync data across devices, such as Apple devices and the Apple iCloud service. Moreover, many individuals committing offenses relating to civil disturbances and riots often retain videos, photos, and commentary about their participation in such offenses, essentially bragging about their participation.

69. Based on my training and experience, and on conversations I have had with other law enforcement officers, I know that some individuals who participate in civil disturbances and riots use anonymizing services and/or applications capable of encrypting communications to protect their identity and communications. By using such tools, in some cases, the only way to see the content of these conversations is on the electronic device that had been used to send or receive the communications.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

70. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the

Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

71. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the device consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

72. *Manner of execution.* Because this warrant seeks only permission to examine a device already in law enforcement's possession, the execution of this warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

CONCLUSION

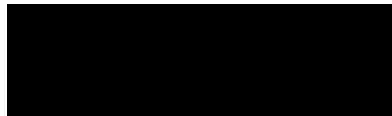
73. Based on the above, there is probable cause to believe there is evidence relating to a violation of Conspiracy to Riot (18 U.S.C. § 371 and 18 U.S.C. § 2101). The actions of the 31 individuals who organized and conspired to travel to Coeur d'Alene, Idaho, in similar clothing (like a uniform), holding riot shields and metal poles, wearing other riot gear (to include shin guards and protective head gear), anticipating a "confrontational dynamic" with the use of a smoke grenade, and carrying a tactical medical kit demonstrates probable cause that the Target Subjects conspired to incite a riot, participate in or carry on a riot, or commit an act of violence in furtherance of a riot. The plans and actions taken by the 31 Patriot Front members on June 11, 2022, suggest an intent to provoke a physical confrontation with supporters of the LGBTQIA+ community, thus resulting in a risk of property damage or injury to persons. Accordingly, there is


probable cause for a search warrant authorizing the examination of the Subject Devices described above and in Attachment A to seize the information described in Attachment B.

REQUEST FOR SEALING

74. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and search warrant. I believe that sealing this document is necessary because the warrant is relevant to an ongoing investigation into the criminal organizations as not all of the targets of this investigation will be searched at this time. Based upon my training and experience, I have learned that, online criminals actively search for criminal affidavits and search warrants via the internet, and disseminate them to other online criminals as they deem appropriate, i.e., post them publicly online through the carding forums. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

Respectfully submitted,


Supervisory Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me by video
on July 19, 2022;
20 


CANDY W. DALE
UNITED STATES MAGISTRATE JUDGE

EXHIBIT 1

Barry McHugh
Prosecuting Attorney
501 N. Government Way
Coeur d'Alene, ID 83815
Telephone: (208) 446-1800
Facsimile: (208) 446-1833

ORIGINAL

IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN
AND FOR THE COUNTY OF KOOTENAI

IN THE MATTER OF A SEARCH
WARRANT FOR 3 VEHICLES:
**1: 2007 WHITE FORD ECOLINE
TRUCK (U-HAUL). LICENSE PLATE
AZ AD24442**
**2: 2008 RED TOYOTA
CAMRY.LICENSE PLATE WA BVL9098**
**3: 2001 WHITE FORD RANGER.
LICENSE PLATE WA C85408X**

SEARCH WARRANT

AGENCY CASE NO. **22C24238**

County of Kootenai, STATE OF IDAHO, to:

Detective [REDACTED] is a sheriff, constable, marshal, policeman or other peace officer in Kootenai County.

Proof of testimony by sworn affidavit/and or oral testimony having been presented to me by [REDACTED] and having been attached that there is probable cause to believe that certain property is contained within, to-wit: **1: 2007 WHITE FORD ECOLINE TRUCK (U-HAUL). LICENSE PLATE AZ AD24442, 2: 2008 RED TOYOTA CAMRY.LICENSE PLATE WA BVL9098 & 3: 2001 WHITE FORD RANGER. LICENSE PLATE WA C85408X**

1. Any electronics equipment, including cell phones, laptops, recording devices, radios, GPS devices
2. Media storage devices
3. Any paperwork, including receipts, travel documents, indicia of vehicle ownership, written plans, Patriot Front paraphernalia, rental agreement

- 4. Any shields, personal protective equipment, flags & guidon, restraints
- 5. Clothing indicative of a uniform, blue shirts, tan pants, face coverings and headwear
- 6. Any personal identifying documentation, drivers licenses, social security cards, credit/debit cards, state ID cards
- 7. Any tools
- 8. Any and all firearms
- 9. Less lethal weapons including explosive type devices
- 10. Noise amplification devices

Which property are the fruits and /or evidence of the crimes of:

Idaho Code § 18-1701 Criminal Conspiracy to Commit Riot

And may presently be located at the premises described as follows: **These vehicle's are secured at the Coeur d' Alene Police Department.**

YOU ARE THEREFORE COMMANDED to, pursuant to *I.C.R. 41* and *18 U.S.C. 2703*:

Forthwith search the above described premises within 14 day(s), for the above described property, which search shall be conducted in the daytime.

If the above described property, or any part thereof, is found, then seize said property and leave a copy of this warrant, and a receipt that describes in detail the property seized, with the person from whom it was taken, or in the place where said property was found.

If the above described property, or any part thereof, is found, then prepare a written inventory, describing the property in detail, in the presence of the person from whom it was taken, or in that person's absence, in the presence of some credible person.

This warrant authorizes the copying and later review of the digital storage media and/or electronically stored information. The time for executing the warrant in Idaho Criminal Rule 41 does not apply to copying or review of said property.

Return this search warrant and a written inventory to any magistrate at the Kootenai County Courthouse at Government Way and Garden Avenue, in the City of Coeur d'Alene, Idaho.

DATED this 12 day of June 2022, at 1:20 o'clock p.m.

John A. Coffey 654
MAGISTRATE

EXHIBIT 2

Driver Team Departs: 5:30 a.m. John, Ethan, Jack leave to procure two vehicles. Either flatbeds or cargo vans.

- Call locations listed below at 6:10 a.m. and ask about availability of the rental vehicles.
- If available, request they hold said vehicle until the party arrives.
- Repeat until two vehicles are obtained.
- Drive vehicles to VE and await the arrival of the main party.

Liberty Lake #4743 [21701 E Country Vista Dr, Liberty Lake, WA] 509-944-9608	E Spokane #4714 [5617 E Sprague Ave, Spokane Valley, WA] 505-532-7406	N Spokane #4719 [9116 N Newport Hwy, Spokane, WA] 509-465-3718	Coeur d'Alene #1803 [220 W Kathleen Ave, Coeur d'Alene, ID] 208-676-1441
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All Arrive By: 6 a.m. Saturday 11th

Hog Lake Campground

Lodging Secondary [47.380196, -117.812617]

Fishtrap Lake South Trailhead

Lodging Primary [47.333800, -117.863373]

Fishtrap Lake Recreation Area

CHECKPOINT Primary [47.345621, -117.857083]

(Lodging Primary will serve as Checkpoint Secondary)

Drill: 6 a.m. - 11 a.m.

Prep For Transit: 11 a.m. - 12 noon

Transit: 12 noon - 1 p.m.

Observation Window: 1 p.m. - 2 p.m.

Entry Upon Observation.

During the observation window, men are to remain stationary and silent within vehicles. The scout will relay information to the main party and signal when to make the approach. Once the call is given, the VE will take place and all will proceed in the transport vehicles to the drop site.

Drop Site: [47.676182, -116.790836]

The column will quickly form on the outskirts of the park and proceed inwards until barriers to approach are met. The speech will be given and flyers distributed. Smoke will be used at the discretion of the column coordinators.

Once an appropriate amount of time and confrontational dynamic has been established, the column will disengage and proceed East towards Sherman Ave. After proceeding down

Sherman Ave, the column will turn right at 5th St where the transport vehicles will be waiting.

Backup 1: If the trucks cannot be used for exfil, the scout will be contacted and instructed to return to his vehicle, where he will rendezvous with the column and retrieve four drivers to meet the rest of the column on its way north to the VE.

Backup 2: If Backup 1 does not work for exfil, then the column will proceed north to the VE on foot.

We are here to raise a voice against the moral depravity which permits events such as this to take place, against the predatory acts of homosexuals determined to tear down the pillars of civil society.

These obscene acts perpetrated by drug addled freaks must not be given tolerance to undermine the safety and integrity of American communities. Our youth will rise up and destroy this affront to our culture, or be prey to the repugnant lust of these costumed prostitutes.

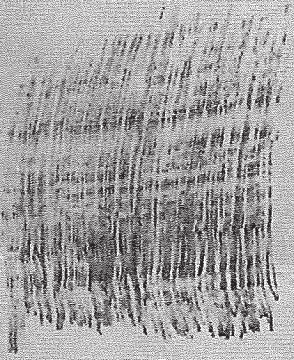
Any man who dares to claim a shred of dignity is now under an undeniable obligation to stand up to this gruesome attempt to turn his community, his nation with a proud history, into a deranged whorehouse. If you are complacent, you will be complicit. Do not bear the shame of knowing you could have stopped this, when it is your child, your sister, your brother, they wish to violate next.

Those who would corrupt our posterity, and poison the minds of our youth ought to be driven beyond the fringes of civilization. Perhaps there, they may practice their hedonism in a cell, or in the sea, but not in the country for which our fathers died.

Do not forget, while they speak of their faux revolution and their fraudulent victimhood, their pockets are lined with state subsidies. The government pours billions into corporations all sharing the same mission, to unleash hordes of crazed perverts into unsuspecting communities, to destabilize the people and erase their culture, so that they may be easier to inflict tyranny upon. Let them choke on their fortunes!

America was built on the backs of families, caring mothers and strong fathers. Modern comforts have obscured this fact. If America is to survive, it will not be for tolerance to what is wrong, but adherence to what is right. Nothing but the natural family can serve as bedrock to the community. Without moral virtue, all liberty is forfeit.

The fulfillment of every urge is their only end, but service to the nation's cause makes a man immortal.



the banks can

ATTACHMENT A

The property to be searched includes 35 subject devices (“Subject Devices”) described below. The Subject Devices are currently located at the FBI Coeur d’Alene Resident Agency located at 2155 West Riverstone Drive, Coeur d’Alene, Idaho 83814, in the District of Idaho.

- a. Black Apple iPhone bearing AT&T card number 8901280333 0287590300 6533c found on the person of GARRET JOSEPH GARLAND (Device-1).
- b. GoPro Camera bearing serial number C3281326969297 found on the person of GARRET JOSEPH GARLAND (Device-2).
- c. Black 7 GoPro Camera bearing serial number C3281326976910 found on the person of JUSTIN MICHAEL O’LEARY (Device-3).
- d. Insta360 with battery and cable bearing serial number 210159503 found on the person of DYLAN CARTER CORIO (Device-4).
- e. Panasonic Lumix Camera bearing serial number WE7SB001867 found in the U-Haul cab (Device-5).
- f. Cruiser Glide USB bearing serial number SD1260-0329 BM200357941W, Sandisk card bearing serial number BQ2022153508Y, Sandisk adapter, and gray key fob 22c700b found on the person of THOMAS RYAN ROUSSEAU (Device-6).
- g. 1 Canon EOS Rebel SL3 bearing serial number 012070008334 found on the person of FORREST CLARK RANKIN (Device-7).
- h. Black Google cellular telephone in Black Nylon Pouch bearing serial number 8901280432 0299014737, belonging to WESLEY EVAN VANHORN (Device-8).

- i. Samsung cellular telephone bearing serial number R3CNCOH6TVH found in red 2008 Toyota Camry WBVL9098 (Device-9).
- j. Samsung cellular telephone bearing IMEI 354805091974331 found in red 2008 Toyota Camry WBVL9098 (Device-10).
- k. Charcoal Apple iPhone with black case bearing sim card number 89148 00000 79848 41953 found in red 2008 Toyota Camry WBVL9098 (Device-11).
- l. Red Apple iPhone with black case marked "UT" bearing T-Mobile sim card number 8901260134 712688251 60.70 found in red 2008 Toyota Camry WBVL9098 (Device-12).
- m. Black Apple iPhone with black case marked "UTAH" bearing Verizon SIM card number 89148 00000 60482 68732 found in red 2008 Toyota Camry WBVL9098 (Device-13).
- n. Black Apple iPhone bearing serial number 353012099082180 found in red 2008 Toyota Camry WBVL9098 (Device-14).
- o. Black LG cellular telephone bearing serial number 002VTMU0105235 found in red 2008 Toyota Camry WBVL9098 (Device-15).
- p. Dark blue/black Apple iPhone with black case marked "CO VAN" bearing T-Mobile card number 8901260012 750656135 60.70 found in red 2008 Toyota Camry WBVL9098 (Device-16).
- q. Black Samsung cellular telephone with black case marked "ALEX CONRAD TX" bearing IMEI 356544765773517 found in red 2008 Toyota Camry WBVL9098 (Device-17).

- r. Black Apple iPhone bearing serial number 357332095088858 found in red 2008 Toyota Camry WBVL9098 (Device-18).
- s. Black Apple iPhone bearing serial number 353063107411564 found in red 2008 Toyota Camry WBVL9098 (Device-19).
- t. Samsung Galaxy A12 cellular telephone bearing serial number 352945782708887 found in red 2008 Toyota Camry WBVL9098 (Device-20).
- u. Silver Samsung Galaxy J3 cellular telephone with grey case “DAVID WA” found in red 2008 Toyota Camry WBVL9098 (Device-21).
- v. Blue Samsung Galaxy cellular telephone marked “UTAH” bearing IMEI 358496091082915 found in red 2008 Toyota Camry WBVL9098 (Device-22).
- w. Black Apple iPhone bearing serial number 353247105398630 found on the person of COLTON MICHAEL BROWN (Device-23).
- x. Black Apple iPhone bearing serial number 353058098256259 found in red 2008 Toyota Camry WBVL9098 (Device-24).
- y. Blue Apple iPhone with black Pelican case bearing AT&T card number 8901280433 0380044576 6533C found in red 2008 Toyota Camry WBVL9098 (Device-25).
- z. Samsung LG S10 cellular telephone bearing IMEI 352810101817308 found on the person of NATHANIEL TAYLOR WHITFIELD (Device-26).
- aa. Google cellular telephone bearing serial number 358275091541033 found in red 2008 Toyota Camry WBVL9098 (Device-27).

- bb. OnePlus cellular telephone bearing IMEI 1 number 869134049792796, IMEI 2 number 869134049792788, MEID 9900 157 100 7360 found in red 2008 Toyota Camry WBVL9098 (Device-28).
- cc. Samsung cellular telephone bearing IMEI number 356550755015629 found on the person of THOMAS RYAN ROUSSEAU (Device-29).
- dd. T-Mobile cellular telephone marked “CO VAN” bearing IMEI 015710000467339 found in red 2008 Toyota Camry WBVL9098 (Device-30).
- ee. Black Apple iPhone bearing serial number 354876507859713 found in red 2008 Toyota Camry WBVL9098 (Device-31).
- ff. White Google cellular telephone bearing Verizon SIM card number 89148 00000 62153 00938 found on the person of GRAHAM JONES WHITSON (Device-32).
- gg. Black Apple iPhone bearing SIM card number 89148 00000 75947 61294 found on the person of JUSTIN MICHAEL O’LEARY (Device-33).
- hh. Black/purple Motorola XT2117-1 cellular telephone bearing IMEI 356889112206657 found in the U-Haul cab (Device-34).
- ii. GoPro Camera bearing ANATEL number 04767 18-08441 and CONATEL number 2018 08-1-000401 found on the person of GRAHAM JONES WHITSON (hereinafter Device-35).

This warrant authorizes the forensic examination of the Subject Devices for the purpose of identifying the electronically stored information described in Attachment B.

ATTACHMENT B

1. The items to be seized are fruits, evidence, information, contraband, or instrumentalities, in whatever form and however stored, relating to violations of Title 18, United States Code, Section 371, by conspiring to violate the Anti-Riot Act, as proscribed by Title 18, United States Code, Section 2101 (the “Subject Offense”) and that have been committed by the following individuals between February 25, 2022, and June 11, 2022:

- a. Garret Joseph GARLAND, who resides in Illinois;
- b. Devin Wayne CENTER, who resides in Arkansas;
- c. Wesley Evan VANHORN, who resides in Alabama;
- d. Dylan Carter CORIO, who resides in Wyoming;
- e. Lawrence Alexander NORMAN, who resides in Oregon;
- f. Richard Jacob JESSOP, who resides in Idaho;
- g. Winston Worth DURHAM, who resides in Idaho;
- h. Conor James RYAN, who resides in Colorado;
- i. Forrest Clark RANKIN, who resides in Colorado;
- j. Nathanael David BRENNER, who resides in Colorado;
- k. Mitchell Frederick WAGNER, who resides in Missouri;
- l. Derek Joseph SMITH, who resides in South Dakota;
- m. James Michael JOHNSON, who resides in South Dakota;
- n. Colton Michael BROWN, who resides in Washington;
- o. James Julius JOHNSON, who resides in Washington;
- p. Justin Michael O’LEARY, who resides in Washington;
- q. Mishael Joshua BUSTER, who resides in Washington;

- r. Spencer Thomas SIMPSON, who resides in Washington;
 - s. Alexander Nikolai SISENSTEIN, who resides in Utah;
 - t. Branden Mitchel HANEY, who resides in Utah;
 - u. Cameron Kathan PRUITT, who resides in Utah;
 - v. Dakota Ray TABLER, who resides in Utah;
 - w. Jared Michael BOYCE, who resides in Utah;
 - x. Nathaniel Taylor WHITFIELD, who resides in Utah
 - y. Thomas Ryan ROUSSEAU, who resides in Texas;
 - z. Connor Patrick MORAN, who resides in Texas;
 - aa. Graham Jones WHITSON, who resides in Texas;
 - bb. Josiah Daniel BUSTER, who resides in Texas;
 - cc. Kieran Pdraig MORRIS, who resides in Texas;
 - dd. Robert Alden Benjamin WHITTED, who resides in Texas; and
 - ee. Steven Derrick TUCKER, who resides in Texas
- (Collectively, the “Target Subjects”).

The categories of information to be seized include:

2. Communications, including but not limited to texts, chats, messages, emails, and other electronic communications, that relate to the group’s intent, plan, and preparation for being present at, and otherwise relating to, Pride in the Park in Coeur d’Alene, Idaho, on June 11, 2022.

3. Communications, including but not limited to voice mail, saved verbal communications, recordings of meetings that refer and relate to the group’s intent, plan, and

preparation for being present at, and otherwise relating to, Pride in the Park in Coeur d'Alene, Idaho, on June 11, 2022.

4. Evidence of user attribution showing who used or owned the Device at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history.

5. Records on devices evidencing GPS coordinates as it relates to the group's intent, plan, and preparation for being present at, and otherwise relating to, Pride in the Park in Coeur d'Alene, Idaho, on June 11, 2022.

6. Bank records, checks, credit card bills, account information, and other financial records referring and relating to travel and purchases, including hotels, as it relates to the group's intent, plan, and preparation for being present at, and otherwise relating to, Pride in the Park in Coeur d'Alene, Idaho, on June 11, 2022.

7. Records evidencing the use of the Internet Protocol address, including:
- a. records of Internet Protocol addresses used;
 - b. records of Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

As used above, the terms "records" and "information" include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.

This warrant authorizes a review of electronic storage media and electronically stored information seized or copied pursuant to this warrant in order to locate evidence, fruits, and

instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the seized or copied electronic data to the custody and control of attorneys for the government and their support staff for their independent review.

UNITED STATES DISTRICT COURT

for the
District of Idaho

In the Matter of the Search of)
(Briefly describe the property to be searched)
or identify the person by name and address))
ALL ELECTRONIC DEVICES OUTLINED IN ATTACHMENT)
A, CURRENTLY LOCATED AT 2155 WEST RIVERSTONE)
DRIVE, COEUR D'ALENE, ID 83814)

Case No. 1: 22-mj-173-CWD

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the _____ District of _____ Idaho
(identify the person or describe the property to be searched and give its location):

See Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B.

YOU ARE COMMANDED to execute this warrant on or before August 3, 2022 (not to exceed 14 days)

in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Hon. Candy W. Dale
(United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

for _____ days (not to exceed 30) until, the facts justifying, the later specific date of _____

Date and time issued: July 20, 2022 at 10:40 a.m.


Judge's signature

City and state: Boise, Idaho

Hon. Candy W. Dale, United States Magistrate Judge
Printed name and title

AO 93C (08/18) Warrant by Telephone or Other Reliable Electronic Means (Page 2)

Return

Case No.: 1: 22-mj-173-CWD	Date and time warrant executed:	Copy of warrant and inventory left with:
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Inventory made in the presence of :

Inventory of the property taken and name(s) of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

ATTACHMENT A

The property to be searched includes 35 subject devices (“Subject Devices”) described below. The Subject Devices are currently located at the FBI Coeur d’Alene Resident Agency located at 2155 West Riverstone Drive, Coeur d’Alene, Idaho 83814, in the District of Idaho.

- a. Black Apple iPhone bearing AT&T card number 8901280333 0287590300 6533c found on the person of GARRET JOSEPH GARLAND (Device-1).
- b. GoPro Camera bearing serial number C3281326969297 found on the person of GARRET JOSEPH GARLAND (Device-2).
- c. Black 7 GoPro Camera bearing serial number C3281326976910 found on the person of JUSTIN MICHAEL O’LEARY (Device-3).
- d. Insta360 with battery and cable bearing serial number 210159503 found on the person of DYLAN CARTER CORIO (Device-4).
- e. Panasonic Lumix Camera bearing serial number WE7SB001867 found in the U-Haul cab (Device-5).
- f. Cruiser Glide USB bearing serial number SD1260-0329 BM200357941W, Sandisk card bearing serial number BQ2022153508Y, Sandisk adapter, and gray key fob 22c700b found on the person of THOMAS RYAN ROUSSEAU (Device-6).
- g. 1 Canon EOS Rebel SL3 bearing serial number 012070008334 found on the person of FORREST CLARK RANKIN (Device-7).
- h. Black Google cellular telephone in Black Nylon Pouch bearing serial number 8901280432 0299014737, belonging to WESLEY EVAN VANHORN (Device-8).

- i. Samsung cellular telephone bearing serial number R3CNCOH6TVH found in red 2008 Toyota Camry WBVL9098 (Device-9).
- j. Samsung cellular telephone bearing IMEI 354805091974331 found in red 2008 Toyota Camry WBVL9098 (Device-10).
- k. Charcoal Apple iPhone with black case bearing sim card number 89148 00000 79848 41953 found in red 2008 Toyota Camry WBVL9098 (Device-11).
- l. Red Apple iPhone with black case marked "UT" bearing T-Mobile sim card number 8901260134 712688251 60.70 found in red 2008 Toyota Camry WBVL9098 (Device-12).
- m. Black Apple iPhone with black case marked "UTAH" bearing Verizon SIM card number 89148 00000 60482 68732 found in red 2008 Toyota Camry WBVL9098 (Device-13).
- n. Black Apple iPhone bearing serial number 353012099082180 found in red 2008 Toyota Camry WBVL9098 (Device-14).
- o. Black LG cellular telephone bearing serial number 002VTMU0105235 found in red 2008 Toyota Camry WBVL9098 (Device-15).
- p. Dark blue/black Apple iPhone with black case marked "CO VAN" bearing T-Mobile card number 8901260012 750656135 60.70 found in red 2008 Toyota Camry WBVL9098 (Device-16).
- q. Black Samsung cellular telephone with black case marked "ALEX CONRAD TX" bearing IMEI 356544765773517 found in red 2008 Toyota Camry WBVL9098 (Device-17).

- r. Black Apple iPhone bearing serial number 357332095088858 found in red 2008 Toyota Camry WBVL9098 (Device-18).
- s. Black Apple iPhone bearing serial number 353063107411564 found in red 2008 Toyota Camry WBVL9098 (Device-19).
- t. Samsung Galaxy A12 cellular telephone bearing serial number 352945782708887 found in red 2008 Toyota Camry WBVL9098 (Device-20).
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- ii. GoPro Camera bearing ANATEL number 04767 18-08441 and CONATEL number 2018 08-1-000401 found on the person of GRAHAM JONES WHITSON (hereinafter Device-35).

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ATTACHMENT B

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- g. Winston Worth DURHAM, who resides in Idaho;
- h. Conor James RYAN, who resides in Colorado;
- i. Forrest Clark RANKIN, who resides in Colorado;
- j. Nathanael David BRENNER, who resides in Colorado;
- k. Mitchell Frederick WAGNER, who resides in Missouri;
- l. Derek Joseph SMITH, who resides in South Dakota;
- m. James Michael JOHNSON, who resides in South Dakota;
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 - v. Dakota Ray TABLER, who resides in Utah;
 - w. Jared Michael BOYCE, who resides in Utah;
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 - y. Thomas Ryan ROUSSEAU, who resides in Texas;
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 - aa. Graham Jones WHITSON, who resides in Texas;
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- (Collectively, the “Target Subjects”).

The categories of information to be seized include:

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- a. records of Internet Protocol addresses used;
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As used above, the terms "records" and "information" include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.

This warrant authorizes a review of electronic storage media and electronically stored information seized or copied pursuant to this warrant in order to locate evidence, fruits, and

instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the seized or copied electronic data to the custody and control of attorneys for the government and their support staff for their independent review.