

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
Robert C. Chapman (AKA: Robert Erick)
[Redacted]
Defendant(s)
Case No.

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) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority,
18 U.S.C. § 1752(a)(2) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority,
40 U.S.C. § 5104(e)(2)(D) - Violent Entry and Disorderly Conduct on Capitol Grounds,
40 U.S.C. § 5104(e)(2)(G) - Violent Entry and Disorderly Conduct on Capitol Grounds.

This criminal complaint is based on these facts:

See attached statement of facts.

[X] Continued on the attached sheet.

[Redacted Signature]
Complainant's signature

[Redacted Name], Special Agent
Printed name and title

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

Date: 04/13/2021

[Handwritten Signature]

Judge's signature

City and state: Washington, D.C.

Robin M. Meriweather, U.S. Magistrate Judge
Printed name and title

STATEMENT OF FACTS

Your affiant, [REDACTED], is a Task Force Officer with the Federal Bureau of Investigation (“FBI”). Specifically, I am assigned to the New York Field Office, tasked with investigating counterterrorism matters. As a Task Force Officer with the Federal Bureau of Investigation, I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of a violation of Federal criminal laws.

The 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 are 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, D.C. 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.

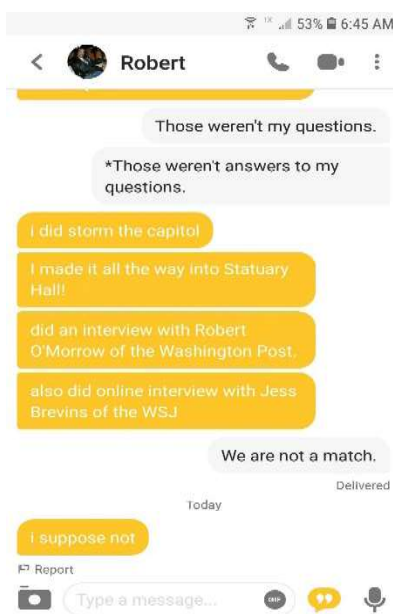
At such time, the certification proceedings still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, shortly after 2:00 p.m., individuals 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.

On or about January 13, 2021, an individual (“Complainant-1”) provided information to law enforcement about another individual who participated in the unlawful entry into the Capitol on or about January 6, 2021. Complainant-1 stated, in sum and substance, that an individual known to him/her as “Robert Chapman” of Carmel, New York, is known to use the Bumble social media platform with the username “Robert”. According to Complainant-1, on January 13, 2021, he/she was texting with “Robert” via Bumble. During their text communication, “Robert” stated “I did storm the Capitol and made it all the way to Statuary Hall”. Complainant-1 provided a screen shot of the above conversation to law enforcement. (*See Figure 1*).



See Figure 1

The screenshot from Complainant-1 included the Bumble Account holder’s profile picture, (*See Figure 2*), which appeared to be a picture of the individual known to Complainant-1 as “Robert Chapman.”



See Figure 2

In an effort to further this investigation and to ascertain whether “Robert Chapman” was inside of the U.S. Capitol Building, your affiant reviewed body-camera from the Metropolitan Police Department, recorded on January 6, 2021. In the body-camera footage, an individual who appears to be “Robert Chapman” is located inside of the Capitol Buildings in Statuary Hall. This footage corroborates “Robert Chapman’s” statement to Complainant-1 regarding being inside of Statuary Hall while inside of the U.S. Capitol Building.

During the video, “Robert Chapman” is seen filming the activity inside of the U.S. Capitol using his cellular telephone. Screen captures from that video with a time and date stamp are depicted below.



Figure 3



Figure 4

While reviewing *Figures 2, 3, and 4*, your affiant observed that the individual in *Figure 2* appeared to be wearing the same navy/black dark-colored bandana as the individual in *Figure 3*. The bandana worn by the individual in *Figure 4* appears to be different in color on the front and right side than the left side of the bandana, which is shown in figure 3. As discussed below, we subsequently obtained an additional photograph (*Figure 7*) that shows the two different colors of the bandana.

Your affiant searched numerous databases to further determine if the individual depicted in *Figure 3* and *Figure 4* was “Robert Chapman.” According to the New York State Police Department, an individual identified as “Robert Chapman” was arrested in 2017 in the state of New York. Your affiant obtained a photograph of “Robert Chapman” taken at the time of his arrest (*See Figure 5*). Your affiant observed that the individual depicted in *Figure 5* has similar facial hair as the individual depicted inside of the U.S. Capitol in *Figures 3* and *4*.



Figure 5

In addition to the arrest photograph identifying “Robert Chapman,” the FBI provided your affiant with surveillance footage of the individual believed to be “Robert Chapman.” Based on the information provided by Complainant-1 and the video provided by the Metropolitan Police Department, law enforcement elected to conduct surveillance of the individual identified as “Robert Chapman.” Your affiant confirmed that a “Robert Chapman” resided in the state of New York. This information corroborated the information provided by Complainant-1. *Figure 6* is a still photograph obtained from the video surveillance conducted by the FBI.



Figure 6

Upon comparing the individual identified by law enforcement as “Robert Chapman” in *Figure 6* to the individual depicted inside of the U.S. Capitol Building in *Figures 3* and *4*, your affiant believes that Robert Erick and Robert Chapman are one and the same, and as such, is likely the individual depicted inside of the U.S. Capitol Building.

In addition to Complainant-1’s direct communication with CHAPMAN wherein he admitted to entering the U.S. Capitol Building, Complainant-1 informed the FBI that he/she observed a Facebook post on a Facebook page with account profile name “funkyvunky.” Complainant-1 provided a screenshot of the Facebook page. In the screenshot, an individual who appears to be ERICK is depicted inside of Statuary Hall inside of the U.S. Capitol Building. The screenshot includes a Facebook post, dated January 7th, made by an individual with the name “Lisa Jeanne Vunk.” In the post, Vunk writes: “My Dear friend and Brostar Robert made it in the Capitol building at the protest yesterday....Wooo Hooooo!!!!” (*See Figure 7*). In the comments of the post, an individual named “Robert Erick” writes: “Lisa Jeanne Vunk these are your peers? colleagues? they are a bunch of little bitch trolls. keyboard warriors who don’t do a fuckin thing.”



Figure 7

Your affiant observed that the individual depicted in *Figure 7* matches the physical characteristics of the individual in *Figures 3* and *4*. Notably, the individual appears to be attired in the same jacket and wearing the same multi-colored bandana. Additionally, in *Figure 7*, your affiant was able to observe a front-facing view of the individual, including the headband depicted in *Figures 3* and *4*. From the angle in *Figure 7*, it appears that the bandana is white on one side and navy/black on the other side, providing an explanation for the differing colors of the bandana in *Figures 3* and *4*.

Based upon ERICK's statement to Complainant-1, as it relates to his location inside of Statuary Hall and the screenshot of the individual depicted in *Figures 3*, *4*, and *7*, your Affiant believes that ERICK is the individual depicted in *Figure 7*.

During an open source check of CHAPMAN, your affiant learned that CHAPMAN utilized a Facebook account with a profile name of "robert.erick.7" with registered email addresses "nampahc10@yahoo.com" and "robert.erick.7@facebook.com." The aforementioned Facebook account was public. Your affiant observed the Facebook page belonging to "Robert Erick" and

observed photographs depicting a person who appears to be one in the same as ERICK. In one screenshot captured by FBI (*Figure 8*), “Robert Erick” posts: “I’M FUCKIN INSIDE THE CRAPITOL!!!”



Figure 8

The individual in *Figure 8* is wearing the same bandana as the individual in *Figures 3, 4, and 7*.

In a second screenshot taken from “Robert Erick’s” Facebook page (*Figure 9*), the individual in the photograph is seen taking a picture with a statue which your affiant has confirmed is located inside of Statuary Hall inside of the U.S. Capitol Building.

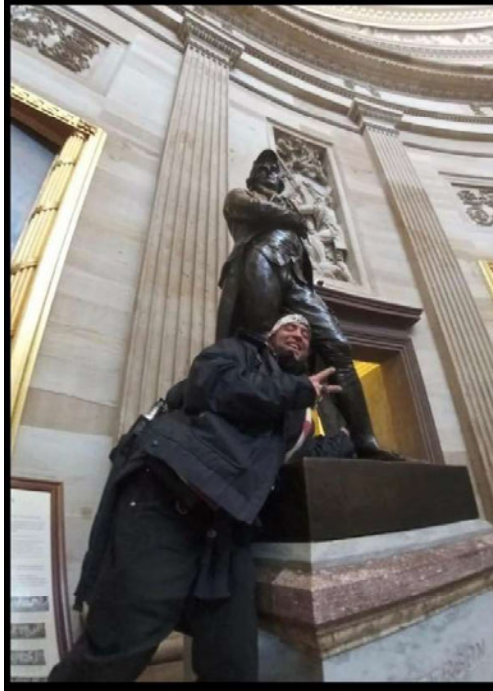


Figure 9

A third screenshot taken from “Robert Erick’s” Facebook page (*Figure 10*), shows a picture of the Apotheosis of Washington which is located inside of the Capitol Rotunda inside of the U.S. Capitol Building.



Figure 10

On or about January 16, 2021, your affiant conducted an online search for Robert CHAPMAN. During the search, your affiant located a 2017 YouTube video. In the video, a white male matching the physical characteristics of CHAPMAN identified himself as “Robert.” The individual stated that he/she was from New York City. The “Robert” in the video wore a similar bandana around his head much like the individual depicted in *Figures 3 and 4*.

Your Affiant located a New York State DMV photograph of Robert Chapman. I compared the DMV photograph to *Figures 1-10*. In doing so, I believe that Robert CHAPMAN is the individual who was inside of the U.S. Capitol on January 6, 2021, and that he is one and the same as the individual who uses the name “Robert Erick.”

At no time was Robert CHAPMAN, a/k/a Robert Erick authorized to enter the U.S. Capitol Building on January 6, 2021.

Based on the foregoing, your affiant submits that there is probable cause to believe that CHAPMAN 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; (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions.

For purposes of Section 1752 of Title 18, a “restricted building” includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is also probable cause to believe that ERICK violated 40 U.S.C. §§ 5104(e), which make it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.

[REDACTED]

[REDACTED] Task Force Officer
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 13th day of April 2021.

A handwritten signature in black ink, appearing to read "Rob M Meriweather", written in a cursive style.

ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE