

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America

v.

Brian J. Cole, Jr.

DOB: XX/XX/XXXX

Case No.

Defendant(s)

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 5, 2021 in the county of Washington in the
District of Columbia, the defendant(s) violated:

Code Section

18 U.S.C. § 844(d)

Offense Description

Explosive Device - transportation in interstate commerce with intent to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property

18 U.S.C. § 844(i)

Explosive Device -malicious destruction or attempted malicious destruction by means of fire and explosive materials

This criminal complaint is based on these facts:

See attached Statement of Facts.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 12/03/2025

City and state: Washington, DC

Judge's signature

Moxila A. Upadhyaya, United States Magistrate Jud*Printed name and title*[Print](#)[Save As...](#)[Attach](#)[Reset](#)

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

[REDACTED] being duly sworn, hereby depose and states as follows:

INTRODUCTION AND AGENT BACKGROUND

[REDACTED]. I am “an investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. As an FBI Special Agent, I have received extensive training in a variety of investigations of federal and state law. During my employment with the FBI, I have participated in mainly international and domestic terrorism investigations. These investigations have given me experience in preparing and assisting in the preparation of court orders and search warrant applications. Additionally, during the course of these and other investigations, I have also conducted or participated in physical and electronic surveillance, assisted in the execution of search and arrest warrants, debriefed informants, interviewed witnesses and suspects, and reviewed other pertinent records.

This affidavit is being submitted in support of a criminal complaint alleging that BRIAN J. COLE, JR. has transported in interstate commerce an explosive with the knowledge or intent that it will be used to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property, in violation of 18 U.S.C. § 844(d); and has maliciously damaged and destroyed and attempted to damage and destroy, by means of fire and explosive materials, the headquarters of the Republican National Committee (RNC) and the Democratic National Committee in Washington, D.C., in violation of 18 U.S.C. § 844(i).

This affidavit is based on my personal knowledge, information provided to me by and through other law enforcement agents, law enforcement records, Rule 41 search warrants, witness interviews, and my training and experience, as well as the training and experience of other law enforcement agents.

Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have only set forth the facts that I believe are necessary to establish probable cause that Defendant violated 18 U.S.C. §§ 844(d) & (i).

Background

Discovery of Pipe Bombs on January 6, 2021

At approximately 1:00 p.m. on January 6, 2021, multiple law enforcement agencies received reports of a suspected improvised explosive device (IED) in the vicinity of the headquarters of the Republican National Committee (RNC) in Washington, D.C. At approximately 1:15 p.m. on the same day, a second suspected IED was reported just a few blocks away in the vicinity of the headquarters of the Democratic National Committee in Washington, D.C. The RNC

and DNC are national organizations that engage in activities on a national level on behalf of their respective political parties, including the solicitation of donations from individuals outside of Washington, D.C. The headquarters of each organization is used in interstate commerce and in activity affecting interstate commerce.

The Hazardous Devices Section of the United States Capitol Police (USCP) responded and performed a render safe procedure on both devices. Subsequently, the FBI assessed that the two devices were both IEDs which contained a main explosive charge, a fuzing system, and a container. The FBI also assessed that the IEDs used a hard metal container (metal pipe nipples and end caps), which showed that weapon characteristics were present. The FBI recovered the components of the disrupted devices. These components were processed as evidence and submitted to the FBI Laboratory for analysis. The FBI Laboratory issued a report regarding the two devices, opining that the submitted items consisted of two disrupted destructive devices and that the use of a hard metal container showed that weapon characteristics were present.

The IEDs were both of a kind more commonly known as “pipe bombs.” Both IEDs were manufactured using a collection of component parts and a main explosive charge. The component parts included a 1-inch by 8-inch pipe, end caps affixed to the pipe, 14-gauge electrical wire in red and black, alligator clips to connect the wires, a nine-volt (9v) battery, a nine-volt (9v) battery connector, a white kitchen timer, paper clips, steel wool, and homemade black powder.

Pipe Bomber Identified on Surveillance Footage

Review of video surveillance footage from the evening of January 5, 2021, shows that the pipe bombs at the RNC and DNC were placed by the same individual. The individual was observed on video surveillance footage at various locations in the surrounding neighborhood between approximately 7:34 p.m. and 8:18 p.m.

In video surveillance, the individual was wearing dark pants, a grey hooded sweatshirt, dark gloves, Nike Air Max Speed Turf shoes, and a facemask that obscured the person’s face. The video surveillance footage shows the individual adjusting eyeglasses at times. The video surveillance footage shows the individual carrying a backpack.

Video footage shows the individual traveling on foot through the surrounding neighborhood of the RNC and DNC, including portions of the route of travel between the two locations. Through video surveillance, the FBI recreated the individual’s path of travel, including timestamps associated with the individual’s location along the route. The individual placed the pipe bomb at the DNC at approximately 7:54 p.m. and at the RNC at approximately 8:16 p.m. on January 5.

In January 2021, the FBI conducted a reverse projection photogrammetry examination (i.e., a height analysis) of the individual depicted in the video surveillance footage. The height analysis showed that the approximate distance from the ground to the top of the individual’s head, including headwear, was 5 feet 7 inches with an error rate of +/- 1.1 inches.

Identification of Brian J. Cole, Jr.

Brian J. Cole, Jr. ("COLE") is a 30 year-old resident of Woodbridge, Virginia. COLE is 5 feet 6 inches tall, and COLE wears corrective eyeglasses.

COLE lives in a single-family house with his mother and other family members. COLE works in the office of a bail bondsman in northern Virginia.

COLE's Purchases of Bombmaking Equipment

The FBI has identified one bank checking account and six credit cards (the "Accounts") used by COLE. The FBI obtained records for the checking account and three credit cards for the time period January 2018 to January 2021. Three additional credit cards were obtained for the time period of January 2018 to November 2025. The FBI reviewed the transaction history for all of these Accounts.

During 2019 and 2020, COLE purchased multiple items consistent with the components that were used to manufacture the pipe bombs placed at the RNC and DNC. COLE used the Accounts to purchase these items from physical retail locations in northern Virginia, as described in more detail below:

- Both pipe bombs were manufactured using a 1" x 8" galvanized pipe with markings consistent with a particular manufacturer's (the "Pipe Manufacturer") product labeling. COLE purchased a total of six galvanized pipes of this size and shape on or about June 1, June 8, and November 16, 2020. The purchases were made at two different Home Depot location in northern Virginia. According to the Pipe Manufacturer, approximately 26,000 of these items from Pipe Manufacturer were sold in 2020, and over 22,000 of these items were sold to Home Depot.
- Both pipe bombs were manufactured using "end caps," which were used to close the ends of the eight-inch pipe. The pipe bombs placed outside the RNC and DNC contained a mix of both black and galvanized end caps. The end caps had markings consistent with Pipe Manufacturer's product labeling. COLE purchased a total of 12 black end caps and 2 galvanized end caps from four different Home Depots in northern Virginia on or about the following dates: October 22, 2019, and March 10, June 20, July 8, and November 16, 2020. According to the Pipe Manufacturer, approximately 233,000 of the black end caps from Pipe Manufacturer were distributed in 2020, including to Home Depot. In addition, approximately 179,200 galvanized end caps from Pipe Manufacturer were distributed in 2020, including to Home Depot.
- Both pipe bombs were manufactured using a nine-volt (9V) battery connector with attached red and black wires. The nine-volt battery connectors used in the pipe bombs had identifying information on the black and red insulated wires that were consistent with those distributed in North America by a known company and its predecessors (the "Nine Volt Distributor"). COLE purchased five of the Nine Volt Distributor's nine-volt battery connectors from Micro Center in northern Virginia on or about November 12

and December 28, 2019, including cash purchases made during the December transaction. Fewer than 8,000 of Nine Volt Distributor's nine-volt battery connectors were distributed in the United States between December 2017 and January 5, 2021.

- Both pipe bombs were manufactured using a white kitchen-style timer. COLE purchased two white kitchen timers from a Walmart in northern Virginia on or about June 3, 2020.
- Both pipe bombs used a mix of 14-gauge red and black electrical wire. COLE purchased 14-gauge electrical wire in red and black on or about May 23 and October 22, 2019, and on or about September 27, October 7, and November 24, 2020. COLE's purchases of 14-gauge red and black electrical wire were made from one Home Depot and one Lowes location in northern Virginia.
- Both pipe bombs were packed with steel wool. COLE purchased steel wool from a Home Depot in northern Virginia on or about December 4, 2020.

In addition to purchasing each type of component used to make the pipe bombs, COLE purchased equipment that would facilitate the manufacturing of a pipe bomb. Such items included:

- Safety glasses on or about July 8, 2020;
- A wire stripping tool on or about November 14, 2020;
- Wire nuts, which are used to join wires together, on or about November 14, 2020;
- Sandpaper on or about November 21, 2020;
- A machinist's file, a tool for shaping and smoothing metal parts, on or about November 21, 2020; and
- Protective gloves and disinfecting wipes on or about November 24, 2020.

Following the placement of the pipe bombs on January 5, 2021, COLE continued to make purchases of components used in bomb making. For example, on January 21, 2021, COLE purchased one white kitchen timer and two nine-volt batteries from Walmart; on January 22, 2021, COLE purchased 2 galvanized pipes measuring 1" x 8" and steel wool from Home Depot; on January 22, 2021, COLE purchased two of a different kind of Nine Volt Distributor's nine-volt battery clips from Micro Center; on January 23, 2021, COLE purchased various alligator clips from Home Depot.

COLE's Location on January 5, 2021

Since at least as early as January 5, 2021, COLE has been the user of a specific telephone number associated with a cellular phone ("COLE CELLPHONE").

The FBI obtained historical cell site records associated with cell towers located in the immediate vicinity of the RNC and DNC for the relevant time period on January 5, 2021. Historical cell site records associated with cell towers provide location data for cellular telephones at specific points in time when the cell phone engages in a transaction with the cell phone tower. Such transactions can include voice calls, text messages, or other data usage. Transactions involving data usage can include a user's active use of a phone, e.g., navigating to a web page, and during a user's passive use of a phone, such as when an application on the phone refreshes data in the background.

Records obtained from the cell phone provider that provides service to the COLE CELLPHONE (the "Provider") included historical cell site records associated with the location of devices on the Provider's network on January 5, 2021. Provider's records included location data for devices on its network that engaged in transactions including voice calls, text messages, and other data usage.

Each of Provider's cell phone towers in the vicinity of the RNC and DNC have sectors that provide coverage for the particular tower. Each sector of a cell phone tower provides approximately 120 degrees of coverage. Due to real world conditions and various forms of interference, the actual coverage on any particular day for a particular sector can extend beyond 120 degrees of coverage or be limited to less than 120 degrees of coverage.

For each cell phone tower, Provider's historical cell site records show the particular "sector" that engaged in each transaction for each individual cell phone. The FBI's Cellular Analysis Survey Team (CAST) has analyzed the location of the COLE CELLPHONE on January 5, 2021.

Provider records show that the COLE CELLPHONE connected with Provider cell phone towers consistent with the COLE CELLPHONE being in the area of the RNC and DNC on January 5, 2021. The COLE CELLPHONE engaged in approximately seven data session transactions with Provider towers between 7:39 p.m. and 8:24 p.m. Provider's historical cell site data shows the specific tower for each of the transactions along with the sector of the tower that engaged in the transaction with the COLE CELLPHONE.

The seven transactions between the COLE CELLPHONE and Provider's towers occurred at approximately 7:39 p.m., 7:44 p.m., 7:59 p.m., 8:14 p.m., 8:23 p.m., and 8:24 p.m. Two transactions took place at 7:39 p.m. During this time period, the COLE CELLPHONE had transactions with five different sectors on Provider's cell towers.

- a. At approximately 7:39:27 p.m., the COLE CELLPHONE interacted with a particular sector of Provider tower 59323, which faces southeast (approximately 120°) from its location at 103 G Street, Southwest in Washington, D.C. ("Sector A"). Also at 7:39:27 p.m., the COLE CELLPHONE interacted with a particular sector of Provider tower 126187, which faces east¹ (approximately 90°) from its

¹ In the Provider's published tower list in February 2021, which is the first published listing of this tower, the Provider listed this particular sector of Provider tower 126187 as facing north

location at 200 Independence Avenue, Southwest in Washington, D.C. (“Sector B”). Video surveillance footage shows that at approximately 7:39:32 p.m., the individual who placed the pipe bombs walked westbound on D Street, Southeast and then turned southbound on South Capitol Street, Southeast. These locations are consistent with the coverage areas of Sector A and B.

- b. At approximately 7:44:36 p.m., the COLE CELLPHONE interacted with Sector B of Provider tower 126187. Video surveillance footage shows that at approximately 7:44:36 p.m., the individual who placed the pipe bombs walked east on Ivy Street, Southeast. This location is consistent with the coverage area of Sector B.
- c. At approximately 7:59:36 p.m., the COLE CELLPHONE interacted with a particular sector of Provider tower 147990 which faces south (approximately 180°) from its location at 200 Independence Avenue, Southwest in Washington, D.C. (“Sector C”). Video surveillance footage shows that at approximately 7:59:38 p.m., the individual who placed the pipe bombs walked southbound on New Jersey Avenue, Southeast then turned eastbound on E Street, Southeast. These locations are consistent with the coverage area of Sector C.
- d. At approximately 8:14:36 p.m., the COLE CELLPHONE interacted with Provider tower 45111 which faces west (approximately 255°) from its location at 101 Independence Avenue, Southeast in Washington, D.C. (“Sector D”). Video surveillance footage shows that at approximately 8:14:15 p.m., the individual who placed the pipe bombs exited Rumsey Court and walked westbound through an alley between the Capitol Hill Club and the RNC then walked northbound onto First Street, Southeast. This location is consistent with the coverage area of Sector D.
- e. At approximately 8:23:59 p.m. and 8:24:06 p.m., the COLE CELLPHONE interacted with Provider tower 144340, which faces west (approximately 295°) from its location at 600 Pennsylvania Avenue, Southeast in Washington, D.C. (“Sector E”). Video surveillance footage last captures the individual who placed the pipe bombs at 8:18 p.m. walking eastbound on Rumsey Court in the direction of tower 144340, which is approximately 1/2 mile east of the individual’s last recorded location. The last recorded location is consistent with the coverage area of Sector E.

(approximately 345°). In April 2021, the Provider updated the direction of this particular sector of Provider tower 126187 as facing east (approximately 90°). The FBI’s drive test conducted in January and February 2021 showed results from this particular sector that were consistent with this particular sector facing east (approximately 90°). The drive test results were inconsistent with the sector facing north. Based on the totality of information available, including the data session transaction with Sector A at 7:39:27 p.m., CAST assesses that the Provider’s listed information about the sector in February 2021 was an error that was corrected in April 2021.

COLE is the registered owner of a 2017 Nissan Sentra with a Virginia license plate. On January 5, 2021, at approximately 7:10 p.m., COLE's Nissan Sentra was observed driving past a License Plate Reader at the South Capitol Street exit from Interstate 395 South, which is less than one-half mile from the location where the individual who placed the devices was first observed on foot near North Carolina and New Jersey Avenues, Southeast at 7:34 p.m. Approximately 5 minutes later, at 7:39:27 p.m., the COLE CELLPHONE began to interact with Provider towers in the area.

COLE's Other Contacts with Washington, D.C.

The FBI has analyzed COLE's purchase history associated with the Accounts. Between January 2018 and January 2021, COLE made a total of five purchases within Washington, D.C. on or about the following dates: January 13, 2018; January 16, 2018; October 31, 2019; December 5, 2020; and December 14, 2020.

Approximately three weeks before the pipe bombs were placed, on or about December 14, 2020, COLE made a purchase at a restaurant located near First and D Streets, Southeast. The restaurant is located across the street from the entrance to Rumsey Court on D Street, Southeast.

Conclusion

For all of the reasons stated above, there is probable cause that, on January 5, 2021, COLE placed pipe bombs outside of the RNC and the DNC, in violation of 18 U.S.C. §§ 844(d) & (i).

I declare under penalty of perjury that the information provided above in this affidavit is true and correct to the best of my knowledge.

[REDACTED]

[REDACTED]

[REDACTED]

UNITED STATES MAGISTRATE JUDGE