

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
AND ARREST WARRANT**

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

PURPOSE OF AFFIDAVIT

1. I make this affidavit in support of an application for an arrest warrant for ISABELLA GIORDANO.

2. Your affiant, [REDACTED], is a Sergeant with the United States Park Police (“USPP”). In my duties as a USPP Sergeant, assigned to the Intelligence and Counterterrorism Branch, I investigate criminal matters, including terrorism. As a federal law enforcement officer, I am authorized by law or by a government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of federal criminal laws.

3. The facts of this affidavit come from my review of the evidence, my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts of which I have hearsay knowledge. This affidavit merely intends to show that sufficient probable cause exists for the requested warrants and does not set forth all of my knowledge about this matter.

FACTUAL BACKGROUND

4. On July 24, 2024, several groups applied for and were granted permits to demonstrate on the National Mall. An organization was granted a sole permit for the area of Columbus Circle, which is located at the intersection of Massachusetts Avenue Northeast and E Street Northeast, Washington, D.C., directly in front of Union Station.

5. In anticipation of the demonstrations, members of the USPP, U.S. Capitol Police (“USCP”), and the Metropolitan Police Department (“MPD”) were present around Columbus Circle and other parts of downtown Washington, D.C.

6. Demonstrators began to gather in Columbus Circle starting at approximately 2:50 p.m. At approximately 3:26 p.m., the USPP revoked the permit that had been issued to the organization. Pursuant to regulation, organizers must undertake, in good faith, all reasonable action to provide sufficient “marshals” to ensure good order and self-discipline during the demonstration. *See* 36 CFR 7.96 (g)(5)(xii). The USPP attempted to locate the organization’s marshals multiple times but were unable to find them. At approximately 3:26 p.m., a USPP Lieutenant called the individual permit holder. The permit holder failed to answer his phone and the call went directly to voicemail. The USPP Lieutenant left a voicemail officially revoking the organization’s permit.

7. Despite the revocation of the permit, demonstrators remained in and around Columbus Circle until approximately 5:00 p.m. From approximately 2:59 p.m. until 5:00 p.m., individuals in Columbus Circle pulled down flags affixed to the flagpoles; burned flags and objects; interfered with law enforcement’s ability to place individuals under arrest; and sprayed graffiti on multiple statutes and structures.

8. The flags pulled down from the flag poles, and the statutes and structures in Columbus Circle, are all property of the federal government. The National Park Service estimated that the total cost to clean up and repair the site at approximately \$11,282.23.

FACTS SUPPORTING PROBABLE CAUSE

GIORDANO's Conduct

9. After observing the destruction of property during the afternoon of July 24, 2024, including the spray painting of structures in Columbus Circle, USPP's Intelligence and Counterterrorism Unit conducted a review of open-source social media platforms to identify possible suspects. During that review, USPP officers saw a video posted to "X" (formerly Twitter), which showed a female with dark hair, later identified as ISABELLA GIODRANO, spraying red spray paint on the Columbus Fountain. GIORDANO was wearing a red shirt, blue jean shorts with a Keffiyeh style headdress tied around her waist, and red shoes.



Figures 1A and 1B: GIORDANO Spraying Painting Statute

10. In anticipation of the demonstration, USPP had arranged an observation post that had a vantage point of Columbus Circle. Video and photographs taken by members of USPP from that observation post show that GIORDANO was present at Columbus Circle at approximately 3:30 p.m. One such video captures GIORDANO spray painting the base of one of the flagpoles in Columbus Circle.



Figure 2: GIORDANO Spray Painting the Base of a Flagpole

11. At some points during the afternoon, GIORDANO moved the Keffiyeh headdress from her waist to her head, which mostly concealed her face. However, GIORDANO's brown ponytail is still visible.

12. The video also shows that, after spray painting the base of the first flagpole, GIORDANO turned to an individual next to her, who was carrying a dark in color backpack. GIORDANO handed them the can of red spray paint and then GIORDANO retrieved a can of white spray paint from the backpack. She then continued to spray the base of the flagpole.



Figure 3: GIORDANO (Circled on Left) Spray Painting the Flagpole and Unidentified Individual Carrying a Backpack (Circled on Right)

13. A few minutes later, GIORDANO moved to another flagpole in Columbus Circle and spray painted that base with white spray paint.



Figure 4: GIORDANO Spray Painting Another Flagpole



Figure 5: Unidentified Individual with the Backpack (Circled on Left) and GIORDANO (Circled on Right)

Identification of GIORDANO

14. On July 30, 2024, the National Park Service issued a USPP bulletin seeking information on five individuals who engaged in criminal activity on July 24, 2024, which included the following image:



Figure 6: Image of Individual from USPP Bulletin Seeking Information

15. On August 1, 2024, USPP received two tips regarding the identity of the individual depicted above. The first tip, from Witness-1 (“W-1”), identified the individual as ISABELLE GIORDANO. Your affiant contacted W-1, who stated that they know GIORDANO personally, and that GIORDANO is employed at a daycare near Towson, Maryland. W-1 also provided your affiant with GIORDANO’s phone number and social media username. Subsequently, your affiant reviewed GIORDANO’s social media account, whose profile picture depicted an individual consistent with the same individual in the bulletin (Figure 6).

16. The second tip, provided by Witness-2 (“W-2), also identified the individual as ISABELLA GIORDANO. Your affiant spoke with W-2, who also knows GIORDANO personally. W-2 pointed to a distinctive tattoo that GIORDANO has on her arm, which is visible in the photo included in the bulletin.

17. On August 15, 2024, after receiving the above information, I visited GIORDANO’s place of employment and showed Witness-3 (“W-3”), a coworker of GIORDANO’s, the bulletin photo. W-3 identified the individual in the photo as ISABELLA GIORDANO.

18. Based on the foregoing, your affiant submits there is probable cause to believe that GIORDANO violated 18 U.S.C. § 1361 by willfully injuring or depredating any property of the United States (damage under a thousand dollars).

United States Park Police

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 12 day of September 2024.

HONORABLE G. MICHAEL HARVEY
UNITED STATES MAGISTRATE JUDGE