

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

DANIEL COURNEY

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

Hon. Edward S. Kiel

Mag. No. 21-mj-15452 (ESK)

**CRIMINAL COMPLAINT**


I, Kelly Blanchfield, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



\_\_\_\_\_

Kelly Blanchfield  
Special Agent  
Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence  
on the 2<sup>nd</sup> day of November, 2021  
at Newark, New Jersey

HONORABLE EDWARD S. KIEL  
UNITED STATES MAGISTRATE JUDGE

E. Kiel  
Signature of Judicial Officer

**ATTACHMENT A**

**Count 1**  
**Freedom of Access to Reproductive Health Services**  
**18 U.S.C. § 248(a)(1)**

On or about October 16, 2021, in Bergen County, in the District of New Jersey, and elsewhere, defendant

**DANIEL COURNEY**

knowingly used force and physical obstruction to intentionally intimidate and interfere with Victim-1 because Victim-1 was or had been providing reproductive health services.

In violation of Title 18, United States Code, Section 248.

**Count 2**  
**Freedom of Access to Reproductive Health Services**  
**18 U.S.C. § 248(a)(1)**

On or about October 30, 2021, in Bergen County, in the District of New Jersey, and elsewhere, defendant

**DANIEL COURNEY**

knowingly used force and physical obstruction to intentionally intimidate and interfere with Victim-1 because Victim-1 was or had been providing reproductive health services.

In violation of Title 18, United States Code, Section 248.

## ATTACHMENT B

I, Kelly Blanchfield, am a Special Agent with the Federal Bureau of Investigation. I am aware of the facts contained herein based upon interviews and briefings with other law enforcement officers. I also have reviewed or been briefed regarding other evidence, including witness interviews and video recordings. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not set forth herein each and every fact that I know or that has been told to me concerning this investigation. Unless specifically indicated, any statements herein attributed to individuals are set forth in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. All referenced times are approximate and refer to Eastern Time.

1. At times relevant to this complaint:

- a. The Clinic is a health care facility as defined in 18 U.S.C. § 248(e)(1), that provides reproductive health services as defined in 18 U.S.C. § 248(e)(5). The Clinic is located in a two-story building in Englewood, New Jersey. The Clinic has a street-level front entrance, directly adjacent to a public sidewalk. Patients and their companions generally park on the street, or in nearby parking lots, and walk down the public sidewalk to the Clinic. The Clinic also has a small parking lot, which is used by staff only and is accessed by an alley to the side of the Clinic building.
- b. Victim-1 is a volunteer at the Clinic. As a volunteer, he advises patients and their companions as to parking and escorts them into and out of the Clinic so the patients may receive reproductive health care services.

2. At approximately 10:00 a.m. on October 16, 2021, a woman who was seeking reproductive health services at the Clinic ("Patient-1") was driven to the Clinic by another individual ("Companion-1") in a vehicle ("Vehicle-1"). Companion-1 pulled over at the curb in front of the Clinic and asked Victim-1 where to park.

3. As Victim-1 was directing Companion-1 and Patient-1 to nearby parking, Defendant, DANIEL COURNEY, approached Vehicle-1 and told Patient-1 to "save your child," and not to go into the Clinic. Defendant COURNEY also told Patient-1 and Companion-1 not to listen to Victim-1's directions. Defendant COURNEY then shoved Victim-1 away from the window of Vehicle-1 in order to prevent Victim-1 from directing Companion-1 and Patient-1 to parking so they could enter the Clinic.

4. At approximately 9:47 a.m. on October 30, 2021, Victim-1 was escorting another woman seeking reproductive health services ("Patient-2") to the entrance of the Clinic. As Victim-1 and Patient-2 approached the Clinic's front door, Defendant COURNEY approached them and moved his body between Victim-1 and Patient-2. Defendant COURNEY then shoved Victim-1 toward the street. Patient-2 then continued walking and entered the Clinic. Outside, Defendant COURNEY taunted Victim-1 calling him a "coward."