

**JAN 13 2018**

AO 91 (Rev. 08/09) Criminal Complaint

**UNITED STATES DISTRICT COURT**  
for the  
District of Columbia

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

United States of America  
v.

AMOS OLAGUNJU

Case: 1:18-mj-0004  
Assigned To: Robinson, Deborah A.  
Assign. Date: 1/16/2018  
Description: Criminal Complaint

*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 12, 2018 in the county of \_\_\_\_\_ in the  
\_\_\_\_\_ District of Columbia, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2261A(1)(B)	Stalking
18 U.S.C. § 2262(a)(1)	Interstate violation of protective order

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.



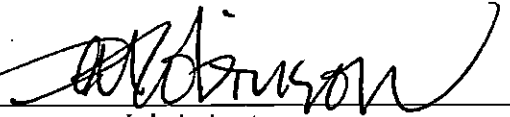
*Complainant's signature*

Christopher Desrosiers, Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 01/13/2018



*Judge's signature*

City and state: Washington, D.C.

US Magistrate Judge Deborah A. Robinson

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

**AMOS OLAGUNJU**  
**DOB:**

**FILED**

**JAN 13 2018**

I, Christopher Desrosiers, being first duly sworn, depose and state as follows: Clark, U.S. District & Bankrupt  
Courts for the District of Colum

**AFFIANT'S BACKGROUND**

1. I am a Special Agent (SA) with the United States Capitol Police (USCP), where I have served since February 2007. I am currently assigned to the Investigations Division Threat Assessment Section. My duties and responsibilities, among other things, include investigations into the stalking and harassment of Members of Congress. I have attended the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have received training and gained experience in arrest warrant applications. I have participated in numerous investigations into violations of federal law against members of Congress to include violations of Title 18, United States Code (U.S.C.), Sections 2261A(1)(B), and 2262(a)(1).
2. Any facts or circumstances that are cited in this affidavit are familiar to me through my direct participation in this investigation and as related to me by other law enforcement officers pertaining to this investigation. The information provided in this affidavit is provided for the limited purpose of establishing probable cause. The information is not a complete statement of all the facts related to this case.

**PURPOSE OF AFFIDAVIT**

3. This affidavit is made in support of a criminal complaint charging **AMOS O. OLAGUNJU** (hereafter **OLAGUNJU**) with violation of Title 18, United States Code, Sections 2261A(1)(B) and 2262(a)(1).
  - a. Title 18 USC 2261A(1)(B) makes it unlawful to travel in interstate or foreign commerce with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, and in the course of, or as a result of, such travel or presence engaged in conduct that causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress.
  - b. Title 18 USC 2262(a)(1) makes it unlawful to travel in interstate or foreign commerce with the intent to engage in, in conduct that violates the portion of a protection order that prohibits or provides protection against violence, threats, or harassment against, contact or communication with, or physical proximity to, another person, or that would violate such a portion of a protection order in the jurisdiction in which the order was issued, and subsequently engaged in such conduct.

**FACTUAL BASIS SUPPORTING PROBABLE CAUSE**

4. On or about May 22, 2014, staff from the Washington, D.C. office of Congresswoman KS of Arizona contacted the United States Capitol Police (hereafter USCP) to report a series of social media messages (via Facebook), and telephone calls from OLAGUNJU. Staff stated that in his communication, OLAGUNJU claimed to have a personal relationship with the Congresswoman.
5. On or about August 26, 2014, the Congresswoman's staff contacted USCP to report that OLAGUNJU's contact had continued and increased in frequency since the original report. Staff reported that OLAGUNJU would express his love for the Congresswoman, reference their future together, and express his desire to meet with the Congresswoman in person. Staff reported over 95 contacts from OLAGUNJU between June 2, 2014 through August 24, 2014.
6. On or about October 14, 2014, the Congresswoman's staff contacted USCP to report that OLAGUNJU had sent the Congresswoman's AZ campaign office a letter including flight information referencing OLAGUNJU travelling to AZ.
7. On or about October 14, 2014, a USCP Agent made contact with OLAGUNJU via telephone to discuss OLAGUNJU's attempts at contact with Congresswoman KS and his reasons for providing his flight information to the Congressional office. OLAGUNJU admitted to contacting the Congressional office and contributing to the Congresswoman's campaign. OLAGUNJU stated that he wanted to help the Congresswoman and further stated that he was a member of the Congresswoman's "team." OLAGUNJU was told by the USCP Agent that his contact with the office was unwanted, and that he was not a member of the Congresswoman's "team."
8. On or about January 16, 2015, OLAGUNJU posted the following message on the Congresswoman's Facebook page:

"How are you doing this beautiful Day? I will be in Washington next month and I would like to stop by and see your new and beautiful office. If you don't mind. Maybe we can have dinner together in a small diner if you want. At least for the first time and go watch movie called "Sema" together. If it is fine with you, please let me know. Ok. Amos"
9. On or about January 20, 2015, OLAGUNJU, posted the following message on the Congresswoman's Facebook page:

"My only one, are you back in Washington? Do you dress warm? It is very cold. I will be watching the president tomorrow by 9:00PM. And I will see you too with the rest Congress. Also by February we shall see each other facially. How great shall it be, I can not wait to see your face. I love you so dearly. Good Night dear. Amos"
10. On or about January 22, 2015, a USCP Agent made contact with OLAGUNJU via telephone and explained to OLAGUNJU that his messages to the Congresswoman were

“Darling, the wedding gown, I love that, It is so moderate, beautiful, I want you to have it, You’ll have when I see you less than two weeks. Love.”

24. On or about October 12, 2017, the Congresswoman’s staff reported to USCP that their Washington, DC office had received a mailing from OLAGUNJU, which included a letter and a copy of the 2017 injunction. The letter included the following statements:

“About us, we’re determined to marry each other, nothing can change that or delay us for living together. Two years ago, you told me to ship all my belongings to you which I did, before problems started with Williams and your staffs. I told you before that I would be a father of your children taking good care of them, and you a great husband till the end of my life.”

25. On or about November 15, 2017, the Congresswoman’s staff reported to USCP that OLAGUNJU contacted their Washington, DC office via telephone, and requested to speak with the Congresswoman. The request was denied and the call was terminated.

26. On or about January 12, 2018, staff from the Congresswoman’s Washington, DC office contacted USCP to report that OLAGUNJU had arrived in-person at their office, and stated that he had a meeting with the Congresswoman. USCP Officers responded to the office immediately, and OLAGUNJU was subsequently arrested for violating the injunction order.

*I am aware that, prior to arrest, the arresting officer contacted authorities in Phoenix, AZ, and confirmed that the 2017 injunction remained in force.*

*CD 1/13/2018*

CONCLUSION

- 27. Based on the abovementioned facts, I submit there is probable cause to believe that on or about January 12, 2018, AMOS OLAGUNJU traveled in interstate or foreign commerce with the intent to kill, injure, harass, intimidate another person, or placed under surveillance with intent to kill, injure, harass, or intimidate another person, and in the course of, or as a result of, such travel or presence engaged in conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress, in violation of 18 U.S.C. § 2261A(1)(B).
  
- 28. Additionally, based on the abovementioned facts, I submit there is probable cause to believe that on or about January 12, 2018, AMOS OLAGUNJU traveled in interstate or foreign commerce with the intent to engage in in conduct that violates the portion of a protection order that prohibits or provides protection against violence, threats, or harassment against, contact or communication with, or physical proximity to, another person, or that would violate such a portion of a protection order in the jurisdiction in which the order was issued, and subsequently engaged in such conduct, in violation of 18 U.S.C. § 2261A(1)(B) and 2262(a)(1).



Christopher Desrosiers, Special Agent  
United States Capitol Police

Subscribed and sworn before me this 13<sup>th</sup> day of January 2018.



Hon. Deborah A. Robinson  
United States Magistrate Judge