

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

Jack Jesse Griffith

A.K.A.

Juan Bibiano

DOB: XXXXXXXX

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)
)
)

Case: 1:21-mj-00079

Assigned To : Meriweather, Robin M.

Assign. Date : 1/15/2021

Description: Complaint w/ Arrest Warrant

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 6, 2021 in the county of in the District of Columbia, the defendant(s) violated:

Code Section

18 U.S.C. 1752 (a)(1)-(2)

40 U.S.C. 5104(e)(2)(D),(G)

Offense Description

Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority

Violent Entry and Disorderly Conduct on Capitol Grounds

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

Daniel J. Senters

Complainant's signature

Daniel J. Senters, 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 (specify reliable electronic means).

Date: 01/15/2021



Robin M. Meriweather

Robin M. Meriweather
2021.01.15 19:11:38 -05'00

Judge's signature

City and state: Washington D.C.

Robin M. Meriweather, United States Magistrate Judge

Printed name and title

STATEMENT OF FACTS

On January 6, 2021, your affiant, Daniel J. Seters, was on duty and performing my official duties as a Special Agent. Specifically, I am assigned to the Washington Field Office, tasked with investigating criminal activity in and around the Capitol grounds. As a Special Agent, 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.

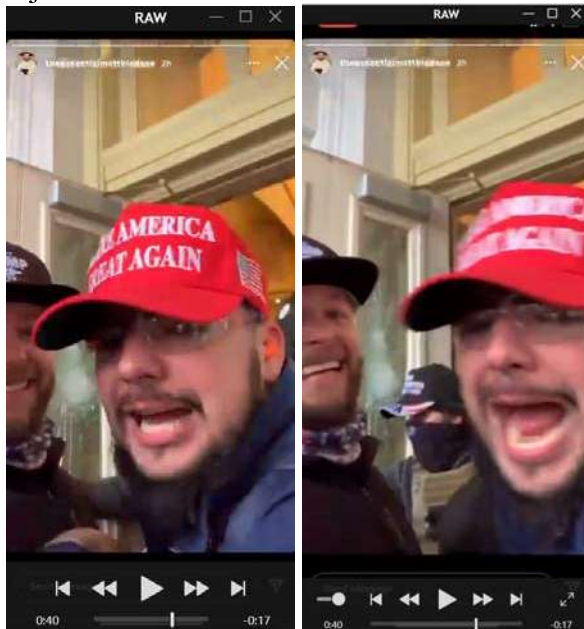
At such time, the certification proceedings still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, between 1:00 and 2:00 p.m., individuals 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.

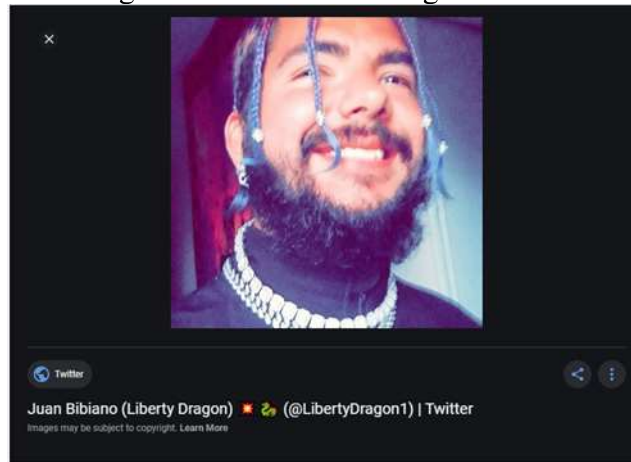
FBI Agents also received a tip that Matthew Bledsoe had been part of the group that entered the Capitol illegally. Upon following up, they received a video compilation that was posted to his Instagram account – theessentialmattbledsoe – which included a compilation video in which Mr. Bledsoe documents his participation and the participation of others in forcing entry into the Capitol. One clip in this compilation shows Mr. Bledsoe and his companions immediately outside an exterior door of the Capitol. An alarm can be heard blaring in the background. The companion in a fleece-lined hat says, “We’re going in!” The camera pans to show a man in clear glasses, a red baseball hat, and a blue jacket who screams in excitement.



An informant who is familiar with Jack Jesse Griffith identified him as the Facebook user Juan Bibiano and provided the FBI with posts from the Juan Bibiano Facebook account. One post included a photo of Juan Bibiano AKA Jack Jesse Griffith in what appears to be the Crypt raising his closed fist into the air. Mr. Bibiano is wearing clear glasses, a red baseball hat, and a blue jacket which is now unzipped revealing two distinctive light colored necklaces. Another post also includes a message where Juan Bibiano AKA Jack Jesse Griffith says, “I even helped stormed [sic] the capitol today, but it only made things worse.”



Law enforcement also located a Twitter account titled Liberty Dragon with a profile picture showing the same person wearing the same distinctive light-colored necklace.



Law enforcement was able to see a permalink¹ in a Google search which contained text stating, “All going to D.C. THE CAVALRY IS COMING!!!!” He then references Matthew Bledsoe saying, “Follow my bro I just met @theessentialmattbledsoe #WildProtest #washingtondc #MAGA”

<https://www.facebook.com/permalink>

Liberty Dragon - IT'S A FIGHT!!! GOD BLESS MY ... - Facebook

All going to D.C. THE CAVALRY IS COMING!!! Follow my bro I just met @theessentialmattbledsoe #WildProtest #washingtondc #Maga See More · 88. Share.

¹ “On Facebook, individual posts can be identified using a unique URL, or “permalink.” On the back-end, Facebook does not store permalinks in their entirety; instead, Facebook stores an identifier (such as an ID number) for each individual post and programmatically constructs permalinks using this information.” *See Rembrandt Soc. Media, LP v. Facebook, Inc.*, 640 F. App'x 943, 946 (Fed. Cir. 2016).

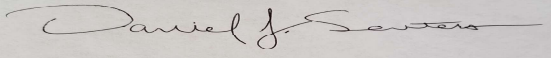
The social media photographs of Juan Bibiano were compared to a Tennessee DMV photograph of Jack Jesse Griffith corroborated this identification.



Based on the foregoing, your affiant submits that there is probable cause to believe that Jack Jesse Griffith AKA Juan Bibiano 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; and (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; or attempts or conspires to do so. 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 Jack Jesse Griffith AKA Juan Bibiano violated 40 U.S.C. § 5104(e)(2)(D),(G), which makes 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.



DANIEL J. SENTER
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 15th day of January 2021.



Robin M. Meriweather
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Robin M. Meriweather
U.S. MAGISTRATE JUDGE