

AO 442 (Rev. 11/11) Arrest Warrant

## UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

John Douglas Wright

*Defendant*

) Case: 1:21-mj-00398  
 ) Assigned To : Meriweather, Robin M.  
 ) Assign. Date : 4/23/2021  
 ) Description: COMPLAINT W/ ARREST WARRANT  
 )

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay*(name of person to be arrested)*John Douglas Wright

who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☒ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1752(a)(1), (2) and (4)(Engaging in Physical Violence in a Restricted Building or Grounds); 40 U.S.C. § 5104(e)(2)(D) and (G)(Disorderly Conduct and Parading, Demonstrating, or Picketing); 18 U.S.C. § 231(a)(3)(Obstruction of Law Enforcement During Civil Disorder); 18 U.S.C. § 1512(c)(2)(Obstruction of Justice/Congress); 18 U.S.C. § 1001(False Statement to Federal Agents).

Date: 04/26/2021*Issuing officer's signature*City and state: Washington, D.C.Robin M. Meriweather, U.S. Magistrate Judge*Printed name and title*

## Return

This warrant was received on (date) 4/26/2021, and the person was arrested on (date) 5/3/2021  
 at (city and state) CANTON, OH.

Date: 5/3/2021*Arresting officer's signature*

TIMOTHY M. ALVORD SA / FBI  
*Printed name and title*

## UNITED STATES DISTRICT COURT

for the  
District of Columbia

5:21mj1142

United States of America

v.

John Douglas Wright

) Case: 1:21-mj-00398  
 ) Assigned To : Meriweather, Robin M.  
 ) Assign. Date : 4/23/2021  
 ) Description: COMPLAINT W/ ARREST WARRANT  
 )

---

Defendant

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
 (name of person to be arrested) John Douglas Wright,  
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☒ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1752(a)(1), (2) and (4)(Engaging in Physical Violence in a Restricted Building or  
 Grounds); 40 U.S.C. § 5104(e)(2)(D) and (G)(Disorderly Conduct and Parading, Demonstrating, or  
 Picketing); 18 U.S.C. § 231(a)(3)(Obstruction of Law Enforcement During Civil Disorder);  
 18 U.S.C. § 1512(c)(2)(Obstruction of Justice/Congress);  
 18 U.S.C. § 1001(False Statement to Federal Agents).

Date: 04/26/2021


Issuing officer's signature

City and state: Washington, D.C.Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

## UNITED STATES DISTRICT COURT

for the

District of Columbia

5:21mj1142

United States of America  
v.John Douglas Wright  
DOB: 12/31/1966

)  
 ) Case: 1:21-mj-00398  
 ) Assigned To : Meriweather, Robin M.  
 ) Assign. Date : 4/23/2021  
 ) 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  
 \_\_\_\_\_ in the District of Columbia, the defendant(s) violated:

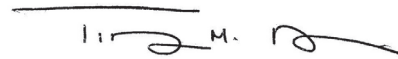
## Code Section

## Offense Description

18 U.S.C. § 1752(a)(1), (2), and (4)(Engaging in Physical Violence in a Restricted Building or  
 Grounds),  
 40 U.S.C. § 5104(e)(2)(D) and (G)(Disorderly Conduct and Parading, Demonstrating, or Picketing),  
 18 U.S.C. § 231(a)(3)(Obstruction of Law Enforcement During Civil Disorder),  
 18 U.S.C. § 1512(c)(2)(Obstruction of Justice/Congress),  
 18 U.S.C. § 1001(False Statement to Federal Agents).

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.


Complainant's signature

Timothy M. Alvord, 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.

Date: 04/26/2021


Judge's signature

City and state: Washington, D.C.

Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

**STATEMENT OF FACTS** 5:21mj1142

1. Your affiant, Timothy M. Alvord, is a Special Agent of the Federal Bureau of Investigation. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. 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.

2. 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 were 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.

***Incursion at the U.S. Capitol on January 6, 2021***

3. 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.

4. 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.

5. At such time, the certification proceedings were 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, shortly around 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.

6. 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.

7. 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.

***Facts Specific to JOHN DOUGLAS WRIGHT***

8. Following the January 6, 2021 attack on the Capitol, your affiant received and reviewed multiple tips submitted by members of the public.

9. Four cooperating witnesses (“CW1”, “CW2”, “CW3” and “CW4”) separately reported that JOHN DOUGLAS WRIGHT (“WRIGHT”) participated in the protest at the Capitol on January 6, 2021.

10. CW1 was aware of WRIGHT’s participation from admissions made by WRIGHT to CW1. CW1 has known WRIGHT for 19 years, and confirms that the individual heard in Facebook video posts from account doug.wright.108 that were posted from inside and outside the Capitol, is in fact WRIGHT.

11. CW2 reported to the FBI that he/she viewed Facebook comments by WRIGHT, which were made to a Facebook page of CW2’s Facebook “friend”, which indicated that WRIGHT made it inside the Capitol Building and was “beat up.”

12. CW3 and CW4 were aware of WRIGHTS’s participation because WRIGHT posted video on his public Facebook account *doug.wright.108*. CW3 and CW4 reported that video from January 6, 2021 depict WRIGHT’s Facebook page broadcasting live video he took from inside the Capitol. CW3 has known WRIGHT for four years and confirm that the individual shown in Facebook posts from account doug.wright.108 that were posted from inside the Capitol, is in fact WRIGHT. CW4 does not know WRIGHT but was able to view the video because a Facebook “friend” of CW4 shared the video of WRIGHT

13. On January 7, 2021, the Canton Repository newspaper published a story about WRIGHT’s attendance at the January 6<sup>th</sup> Washington DC protest. During the interview, WRIGHT stated that he was “beaten up by the cops” and “Yesterday wasn’t the end. Yesterday was the first battle of the war. I promise you”. The following is a picture that accompanied the story:



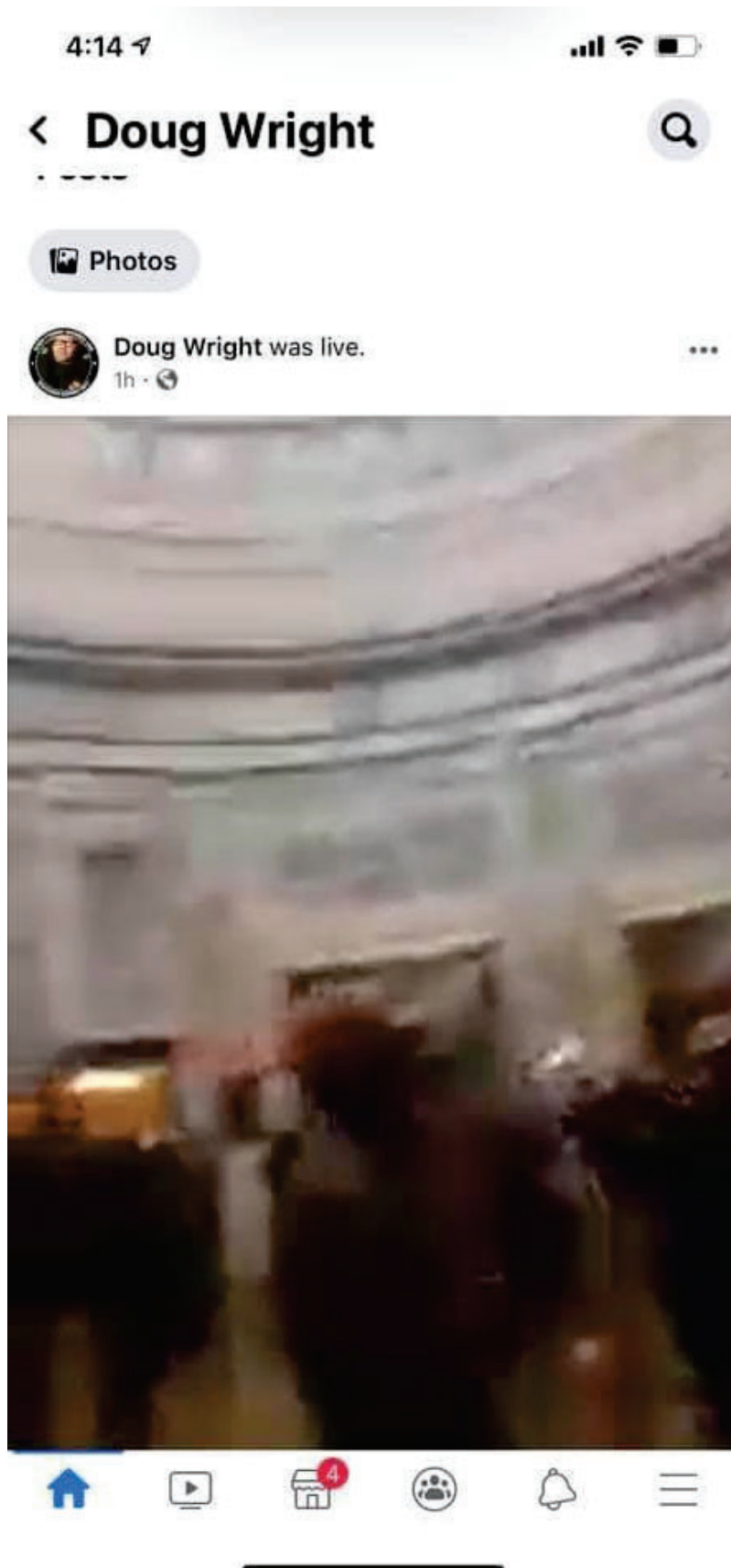


14. On January 7, 2021, CW1 reported to the FBI that WRIGHT made admissions to CW1 that he was detained inside the Capitol Building Rotunda during the riot. WRIGHT told CW1 that he was sprayed with a chemical agent and forced to the ground inside the Capitol Building. CW1 also identified the voice in video's from Facebook account doug.wright.108 as that of WRIGHT. These video's were from inside and outside the Capitol Building.

15. On January 9, 2021, CW2 reported to the FBI that he/she viewed Facebook comments by WRIGHT, which were made to a Facebook page of CW2's Facebook "friend", which indicated that WRIGHT made it inside the Capitol Building and was "beat up".

16. On January 11, 2021, CW3 reported that WRIGHT was inside the U.S. Capitol Building during the riot on January 6, 2021. CW3, who is a Facebook "friend" of WRIGHT, observed video that WRIGHT had posted to his Facebook page. This video, which was broadcast live, was from inside the Capitol Building. CW3 could not see WRIGHT in the video but was able to recognize his voice. CW3 has known WRIGHT for four years, and has met him in person, which is how CW3 is able to identify WRIGHT's voice.

17. On February 8, 2021, CW4 reported to the FBI that he/she observed video that was shared on Facebook from WRIGHTS's Facebook page of video from inside the Capitol Building. This video was from inside the Capitol Rotunda. The Facebook video was titled "Doug Wright was Live". CW4 was able to capture a screenshot of the video.



18. While personally viewing account *doug.wright.108*, your affiant observed statements made by the account user of *doug.wright.108* on January 5, 2021 in which the user states “TODAY WE TAKE GEORGIA TOMORROW WE TAKE OUR COUNTRY BACK (SOUND FAMILIAR)”.

19. While personally viewing account *doug.wright.108*, your affiant observed statements made by the account user of *doug.wright.108* on January 7, 2021 in which the user states “YESTERDAY WAS A PRACTICE RUN”.

20. On January 7, 2021, a review of Facebook account *doug.wright.108*, affiant observed a video, captioned “Doug Wright was Live”. This video was posted on January 6, 2021 at 2:16 pm. This video depicted a crowd near the US Capitol Building. A voice was shouting “We are in the house. All we got to do is get the door down now. We’re gonna drag their stupid asses out”.

21. On January 7, 2021, a review of Facebook account *doug.wright.108*, affiant observed a video, captioned “Doug Wright was Live”. This video was posted on January 6, 2021 at 2:19 pm. This video depicted a crowd near the US Capitol Building. A voice was shouting “Whose house, our house”.

22. A tip submitted to the FBI contained a video attachment of a Facebook Live video, captioned “Doug Wright was Live”. This video was from inside the US Capitol Rotunda, with an individual shouting “Yeah, this is what the inside looks like. We are in our house”.

23. On January 11, 2021, case agent interviewed WRIGHT at his residence. WRIGHT stated that he was not inside the US Capitol Building. After interviewing WRIGHT, and viewing the three Facebook videos described above, your affiant believes that the voice in all three Facebook Live videos is that of WRIGHT.

24. A review of CCTV video from the U.S. Capitol Building revealed an individual, believed to be WRIGHT, in the U.S. Capitol Building, to include the Rotunda. The individual believed to be WRIGHT is wearing the same hooded sweatshirt that he was wearing when interviewed by the Canton Repository on numerous occasions. WRIGHT also shares a photo numerous times on Facebook Messenger that depicts him shoving a police barrier. In this photo, WRIGHT is wearing the same hooded sweatshirt.





25. On March 11, 2021, a Federal Search Warrant was executed on Facebook for the account belonging to *doug.wright.108*. On March 15, 2021, results for account *doug.wright.108* were returned. During these Facebook Messenger conversations, WRIGHT reveals his premeditated intent to assault law enforcement officers, breach the US Capitol Building, commit violence on members of Congress, and participate in “war”. The following conversations were observed between WRIGHT and various individuals on Facebook Messenger (Times are in UTC):

a. Conversation between WRIGHT and Individual 1:

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 03:57:17 UTC

Body WE ARE GOING TO HAVE TO FIGHT THE BLUE TOMORROW

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:05:52 UTC

Body FROM WHAT I SEEN TONIGHT THE TEMPERS WILL BE UP  
TOMORROW AND POLICE LINES WILL BE BREACHED

Author Individual 1 (Facebook: xxxx-225)

Sent 2021-01-06 04:06:46 UTC

Body They need to understand that we are serious! I think they will get the point tomorrow.

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:06:53 UTC

Body WE HAVE ENOUGH TO PUSH THRU

Author Individual 1 (Facebook: xxxx-225)

Sent 2021-01-06 04:07:02 UTC

Body I'm sure

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:07:47 UTC

Body THE FIRST MISTAKE THEY MAKE IN CHAMBERS WE ARE GOING IN  
AND DRAG THEM OUT

Author Individual 1 (Facebook: xxxx-225)

Sent 2021-01-06 04:08:02 UTC

Body Georgia counties are shutting down again this is bullshit

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:08:04 UTC

Body HOPE I MAKE IT THROUGH

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-07 21:21:21 UTC

Body I AM IN RED HOODIE

b. Conversation between WRIGHT and Individual 2:

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:43:19 UTC

Body War tokorrow

Author Individual 2 (Facebook: xxxx-367)

Sent 2021-01-06 04:43:24 UTC

Body So what's next civil war

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:44:09 UTC

Body 5million pissed off patriots tomorrow

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 04:44:35 UTC

Body First battle

c. Conversation between WRIGHT and Individual 3:

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:27:53 UTC

Body ALMOST WAR TIME

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:28:37 UTC

Body Yep! And they are stealing the Georgia run offs as we speak 🤔

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:28:46 UTC

Body I KNOW

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:29:05 UTC

Body THAT WILL BE THE 2ND BATTLE FIELD

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:29:35 UTC

Body I believe war begins tomorrow for Trump...

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:29:47 UTC

Body FOR US

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:30:12 UTC

Body I hope he uses his executive order and arrests them all

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:30:28 UTC

Body ME TOO

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:31:34 UTC

Body You know they are gonna sneak through the tunnels instead of coming out the building. People need to find the tunnel exits and get them

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:31:57 UTC

Body DONE

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-06 05:32:10 UTC

Body ALL PLANNED OUT

Author Individual 3 (Facebook: xxxx-288)

Sent 2021-01-06 05:32:37 UTC

Body I knew you was ahead of the game👍👍

d. Conversation between WRIGHT and Individual 4:

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-07 20:52:06 UTC

Body IT'S FUCKING WAR TIME

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-07 21:10:33 UTC

Body NO MORE PROTESTING

e. Conversation between WRIGHT and Individual 5:

Author Individual 5 (Facebook: xxxx-292)

Sent 2021-01-07 23:08:13 UTC

Body I love it, did you get in?

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-07 23:08:42 UTC

Body SET ON NICE BENCH IN ROTUNDA AND HAD A SMOKE

f. Conversation between WRIGHT and Individual 6:

Author Individual 6 (Facebook: xxxx-378)

Sent 2021-01-08 01:15:23 UTC

Body Are you guys planning on going back to DC

Author Doug Wright (Facebook: 100004111302150)

Sent 2021-01-08 01:15:44 UTC  
Body LOADED

Author Individual 6 (Facebook: xxxx-378)  
Sent 2021-01-08 01:17:33 UTC  
Body When do you plan on going

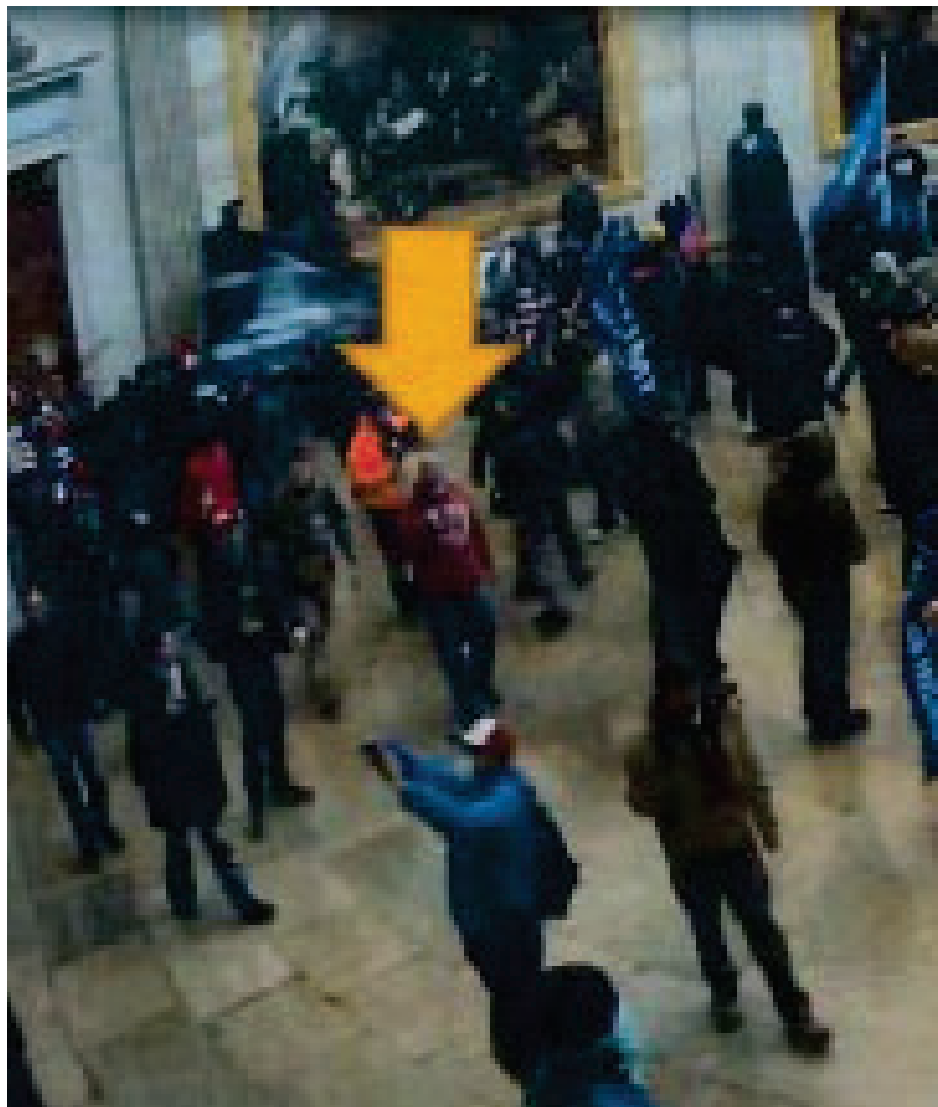
Author Doug Wright (Facebook: 100004111302150)  
Sent 2021-01-08 01:17:45 UTC  
Body 17TH

Author Doug Wright (Facebook: 100004111302150)  
Sent 2021-01-08 01:18:04 UTC  
Body I THINK WE NEED TO MAKE HOME VISITS

26. Upon receiving this information, FBI compared a known image of JOHN DOUGLAS WRIGHT obtained from the Ohio State Bureau of Motor Vehicles on approximately January 9, 2021 to images and surveillance footage obtained by law enforcement at and around the U.S. Capitol on January 6, 2021. By comparing this photograph to the surveillance footage, your affiant reasonably believes that the person is JOHN DOUGLAS WRIGHT.

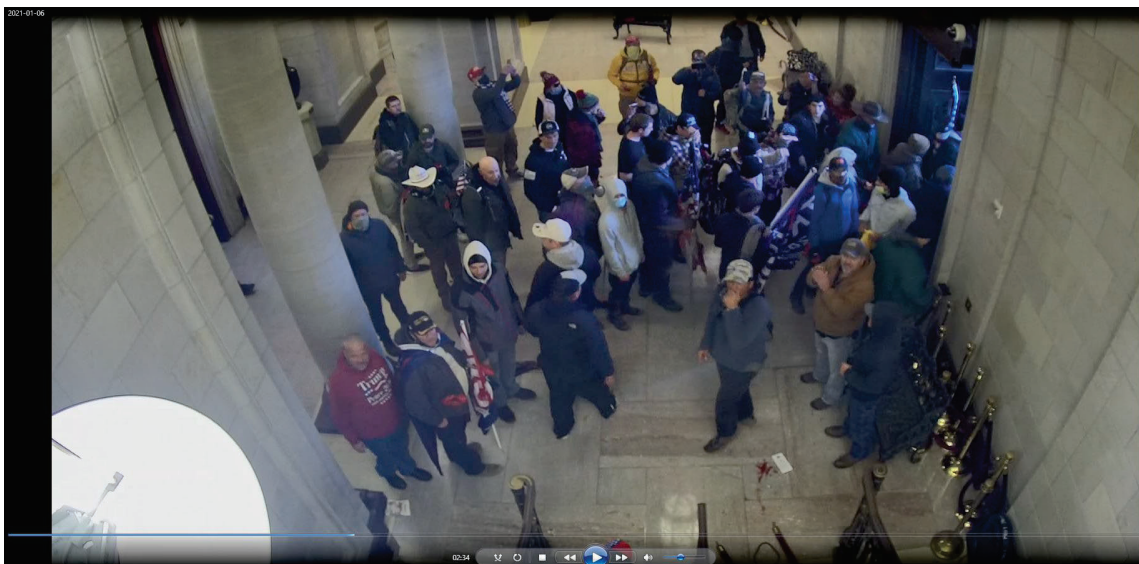


27. Your affiant reviewed surveillance footage of an individual resembling JOHN DOUGLAS WRIGHT inside the U.S. Capitol Rotunda at approximately 2:40 PM. I believe JOHN DOUGLAS WRIGHT to be the individual seen in Photo 1 wearing a red hooded sweatshirt. WRIGHT is seen utilizing his cell phone in this photo. Wright was in the main Rotunda area for approximately 9 minutes 41 seconds.



*Photo 1*

28. CCT Video labeled 7216 USCH 02 Rotunda Lobby East Stairs USCH 02, at approximately 2:49 PM, show WRIGHT as he looks up the stairwell in Photograph 2.



*Photo 2*

29. CCT Video labeled 0686 USCH 02 Rotunda Door Interior, at approximately 2:50 PM, shows WRIGHT is at the left of the screen near the stairwell in Photograph 3.



*Photo 3*

30. Based on my in person interview of WRIGHT, your affiant reasonable believes this Photo 4, which was taken outside the East Front of the U.S. Capitol Building on January 6, 2021, shows JOHN DOUGLAS WRIGHT.



*Photo 4*

31. Your affiant believes this Photo 5, which was taken outside the East Front of the U.S. Capitol on January 6, 2021, shows JOHN DOUGLAS WRIGHT holding onto a police barrier. WRIGHT is wearing the red hooded sweatshirt, with the hood pulled over his head.



*Photo 5*

32. After interviewing WRIGHT and comparing his physical characteristics to the individual captured on video and photographs from inside and outside the Capitol detailed above, your affiant believes that WRIGHT is the same person captured in the videos and photographs.

33. A review of Ohio Secretary of State Business Records indicate that JOHN D. WRIGHT JR. is the Agent/Registrant for the business D AND L CHARTER. This business lists an address known to your affiant in Canton, Ohio, which is the same address as WRIGHT.

34. A review of Facebook account doug.wright.108 indicate the account user's birthdate is a date known to your affiant in December 1966 (and is the same birthdate as WRIGHT), with a registered email account address as [dandlcharter@att.net](mailto:dandlcharter@att.net).

### *Statement of Probable Cause*

35. Based on the foregoing, your affiant submits that there is probable cause to believe that JOHN DOUGLAS WRIGHT violated 18 U.S.C. § 1752(a)(1), (2) and (4), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do so; (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; and (4) knowingly engage in any act of physical violence against any person or property in any restricted building or grounds; 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.

36. Your affiant submits there is also probable cause to believe that JOHN DOUGLAS WRIGHT 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.

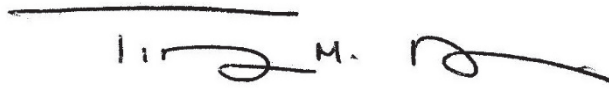
37. Your affiant submits there is probable cause to believe that JOHN DOUGLAS WRIGHT violated 18 U.S.C. 231(a)(3), which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of Section 231 of Title 18, a federally protected function means any function, operation, or action carried out, under the laws of the United States,



by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Joint Session of Congress where the Senate and House count Electoral College votes.

38. Your affiant submits there is probable cause to believe that JOHN DOUGLAS WRIGHT violated 18 U.S.C. § 1512(c)(2), which makes it a crime to obstruct, influence, or impede any official proceeding, or attempt to do so. Under 18 U.S.C. § 1515, congressional proceedings are official proceedings.

39. Finally, your affiant submits there is probable cause to believe that JOHN DOUGLAS WRIGHT violated 18 U.S.C. § 1001, which makes it a crime to willfully make a materially false statement in a matter within the jurisdiction of the executive branch of the Government of the United States.

A handwritten signature in black ink, appearing to read "Tim M. Alvord", written over a horizontal line.

TIMOTHY M. ALVORD  
Special Agent  
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by telephone, this 26<sup>th</sup> day of April 2021.

A handwritten signature in black ink, appearing to read "Robin M. Meriweather", written over a horizontal line.

ROBIN M. MERIWEATHER  
U.S. MAGISTRATE JUDGE



**RECEIVED**

APR 05 2021

Clerk, U.S. District and  
Bankruptcy Courts

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term**

**Grand Jury Sworn in on January 8, 2021**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b>
	:	
<b>v.</b>	:	<b>MAGISTRATE NO. 21-MJ-398</b>
	:	
<b>JOHN DOUGLAS WRIGHT,</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 231(a)(3)</b>
<b>Defendant.</b>	:	<b>(Civil Disorder)</b>
	:	<b>18 U.S.C. §§ 1512(c)(2), 2</b>
	:	<b>(Obstruction of an Official Proceeding)</b>
	:	<b>18 U.S.C. § 1752(a)(1)</b>
	:	<b>(Entering and Remaining in a Restricted</b>
	:	<b>Building or Grounds)</b>
	:	<b>18 U.S.C. § 1752(a)(2)</b>
	:	<b>(Disorderly and Disruptive Conduct in a</b>
	:	<b>Restricted Building or Grounds)</b>
	:	<b>18 U.S.C. § 1752(a)(4)</b>
	:	<b>(Engaging in Physical Violence in a</b>
	:	<b>Restricted Building or Grounds)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(D)</b>
	:	<b>(Disorderly Conduct in the Capitol</b>
	:	<b>Grounds or Buildings)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(F)</b>
	:	<b>(Act of Physical Violence in the Capitol</b>
	:	<b>Grounds or Buildings)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(G)</b>
	:	<b>(Parading, Demonstrating, or Picketing in</b>
	:	<b>a Capitol Building)</b>
	:	<b>18 U.S.C. § 1001</b>
	:	<b>(False Statement to Federal Agent)</b>

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, committed and attempted to commit an act to obstruct, impede, and interfere with law

enforcement officers lawfully engaged in the lawful performance of their official duties incident to and during the commission of a civil disorder, and the civil disorder obstructed, delayed, and adversely affected the conduct and performance of a federally protected function.

**(Civil Disorder**, in violation of Title 18, United States Code, Section 231(a)(3))

**COUNT TWO**

On or about January 6, 2021, within the District of Columbia and elsewhere, **JOHN DOUGLAS WRIGHT**, attempted to, and did, corruptly obstruct, influence, and impede an official proceeding, that is, a proceeding before Congress, by entering and remaining in the United States Capitol without authority and committing an act of civil disorder, and engaging in disorderly and disruptive conduct.

**(Obstruction of an Official Proceeding and Aiding and Abetting**, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2)

**COUNT THREE**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, did unlawfully and knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off, and otherwise restricted area within the United States Capitol and its grounds, where the Vice President and Vice President-elect were temporarily visiting, without lawful authority to do so.

**(Entering and Remaining in a Restricted Building or Grounds**, in violation of Title 18, United States Code, Section 1752(a)(1))

**COUNT FOUR**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, did knowingly, and with intent to impede and disrupt the orderly conduct of Government business and official functions, engage in disorderly and disruptive conduct in and

within such proximity to, a restricted building and grounds, that is, any posted, cordoned-off, and otherwise restricted area within the United States Capitol and its grounds, where the Vice President and Vice President-elect were temporarily visiting, when and so that such conduct did in fact impede and disrupt the orderly conduct of Government business and official functions.

**(Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of Title 18, United States Code, Section 1752(a)(2))**

**COUNT FIVE**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, did knowingly, engage in any act of physical violence against any person and property in a restricted building and grounds, that is, any posted, cordoned-off, and otherwise restricted area within the United States Capitol and its grounds, where the Vice President and Vice President-elect were temporarily visiting.

**(Engaging in Physical Violence in a Restricted Building or Grounds, in violation of Title 18, United States Code, Section 1752(a)(4))**

**COUNT SIX**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, willfully and knowingly engaged in disorderly and disruptive conduct in any of the Capitol Buildings and its grounds with the intent to impede, disrupt, and disturb the orderly conduct of a session of Congress and either House of Congress, and the orderly conduct in that building of a hearing before or any deliberation of, a committee of Congress or either House of Congress.

**(Disorderly Conduct in the Capitol Grounds or Buildings, in violation of Title 40, United States Code, Section 5104(e)(2)(D))**

**COUNT SEVEN**

On or about January 6, 2021, in the District of Columbia, **JOHN DOUGLAS WRIGHT**, willfully and knowingly engaged in an act of physical violence within the United States Capitol Grounds and any of the Capitol Buildings.

**(Act of Physical Violence in the Capitol Grounds or Buildings**, in violation of Title 40, United States Code, Section 5104(e)(2)(F))

**COUNT EIGHT**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, willfully and knowingly parade, demonstrate, or picket in any of the Capitol Buildings.

**(Parading, Demonstrating, or Picketing in a Capitol Building**, in violation of Title 40, United States Code, Section 5104(e)(2)(G))

**COUNT NINE**

On or about January 11, 2021, within the District of Columbia and elsewhere, **JOHN DOUGLAS WRIGHT**, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by affirmatively stating and representing to agents of the Federal Bureau of Investigation of the Department of Justice that he was not inside the U.S. Capitol

Building on January 6, 2021. The statement and representation was false because, as defendant WRIGHT then and there knew, he had entered the U.S. Capitol Building on January 6, 2021.

(**False Statement to Federal Agent**, in violation of Title 18, United States Code, Section 1001)

A TRUE BILL:

FOREPERSON.

A handwritten signature in black ink, appearing to read "Channing D. Phillips" followed by a stylized monogram or initials.

Attorney of the United States in  
and for the District of Columbia.



AO 466A (Rev. 12/17) Waiver of Rule 5 &amp; 5.1 Hearings (Complaint or Indictment)

## UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

FILED

MAY - 3 2021

United States of America  
v.  
JOHN DOUGLAS WRIGHT

Case No. 5:21 mj 1142

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
AKRON

Charging District's Case No. 5:21-mj-00398

Defendant

WAIVER OF RULE 5 & 5.1 HEARINGS  
(Complaint or Indictment)

I understand that I have been charged in another district, the (name of other court) DISTRICT OF COLUMBIA

I have been informed of the charges and of my rights to:


- (1) retain counsel or request the assignment of counsel if I am unable to retain counsel;
- (2) an identity hearing to determine whether I am the person named in the charges;
- (3) production of the warrant, a certified copy of the warrant, or a reliable electronic copy of either;
- (4) a preliminary hearing to determine whether there is probable cause to believe that an offense has been committed, to be held within 14 days of my first appearance if I am in custody and 21 days otherwise, unless I have been indicted beforehand.
- (5) a hearing on any motion by the government for detention;
- (6) request a transfer of the proceedings to this district under Fed. R. Crim. P. 20, to plead guilty.

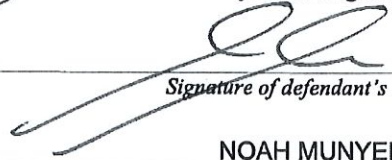
I agree to waive my right(s) to:

- ☒ an identity hearing and production of the warrant.
- ☒ a preliminary hearing.
- ☐ a detention hearing.
- ☐ an identity hearing, production of the judgment, warrant, and warrant application, and any preliminary or detention hearing to which I may be entitled in this district. I request that my ☐ preliminary hearing and/or ☐ detention hearing be held in the prosecuting district, at a time set by that court.

I consent to the issuance of an order requiring my appearance in the prosecuting district where the charges are pending against me.

Date: 05/03/2021

  
ON BEHALF OF JOHN WRIGHT  
Defendant's signature

  
Signature of defendant's attorney

NOAH MUNYER  
Printed name of defendant's attorney



[Query](#) [Reports](#) [Utilities](#) [Help](#) [What's New](#) [Log Out](#)

Termed

**U.S. District Court**  
**Northern District of Ohio (Akron)**  
**CRIMINAL DOCKET FOR CASE #: 5:21-mj-01142-KBB All Defendants**

Case title: United States of America v. Wright

Date Filed: 05/03/2021

Date Terminated: 05/07/2021

Assigned to: Magistrate Judge Kathleen B.  
Burke

**Defendant (1)****John Douglas Wright*****TERMINATED: 05/07/2021***represented by **Noah C. Munyer**Malarcik, Pierce, Munyer & Will  
Ste. 520

121 South Main Street

Akron, OH 44308

330-929-2027

Fax: 330-253-7432

Email: [attorneymunyer@gmail.com](mailto:attorneymunyer@gmail.com)**LEAD ATTORNEY****ATTORNEY TO BE NOTICED***Designation: CJA Appointment**Bar Status: Active***Pending Counts**

None

**Disposition****Highest Offense Level (Opening)**

None

**Terminated Counts**

None

**Disposition****Highest Offense Level (Terminated)**

None

**Complaints**

18 U.S.C. § 1752(a)(1)(2), and (4)  
(Engaging in Physical Violence in a  
Restricted Building or Grounds), 40 U.S.C.

**Disposition**

[Query](#) [Reports](#) [Utilities](#) [Help](#) [What's New](#) [Log Out](#)

Picketing), 18 U.S.C. § 231(a)(3)  
 (Obstruction of Law Enforcement During  
 Civil Disorder), 18 U.S.C. § 1512(c)(2)  
 (Obstruction of Justice/Congress), 18  
 U.S.C. § 1001(False Statement to Federal  
 Agents).

## **Plaintiff**

**United States of America**

represented by **Brian S. Deckert**

Office of the U.S. Attorney - Cleveland  
 Northern District of Ohio  
 Ste. 400  
 801 Superior Avenue, W  
 Cleveland, OH 44113  
 216-622-3873  
 Email: [Brian.Deckert@usdoj.gov](mailto:Brian.Deckert@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**  
*Designation: Retained*  
*Bar Status: Active*

Email All Attorneys

Email All Attorneys and Additional Recipients

Date Filed	#	Docket Text
05/03/2021		Arrest (Rule 40) of John Douglas Wright (1) on 5/3/2021. (P,G) (Entered: 05/03/2021)
05/03/2021	<a href="#">1</a>	Rule 40 Warrant received as to John Douglas Wright (1) (Attachments: # <a href="#">1</a> Criminal Complaint, # <a href="#">2</a> Statement of Facts)(P,G) (Additional attachment(s) added on 5/6/2021: # <a href="#">3</a> Indictment) (P,G). (Entered: 05/03/2021)
05/03/2021		CJA 20 Appointment of Attorney Noah C. Munyer for John Douglas Wright for purposes of Initial Appearance and Detention Hearing. Counsel is reminded of their obligation to report significant changes in defendant's employment or financial circumstances sufficient to enable defendant to pay, in whole or in part, for legal representation. CJA Plan, Part IV (D)(2). Magistrate Judge Kathleen B. Burke on 5/3/2021. (P,G) (Entered: 05/03/2021)
05/03/2021		<b>Minutes of proceedings</b> [non-document]before Magistrate Judge Kathleen B. Burke. Video Initial Appearance in Rule 5(c)(3) Proceedings as to John Douglas Wright (1) held on 5/3/2021. Brian Deckert present as counsel for the government. Attorney Noah Munyer present and appointed as counsel for the defendant for purposes of this hearing and Detention Hearing only. Financial Affidavit executed by attorney with consent of defendant. Defendant consented to participating via video conference, with no objection from defense counsel or government. Defendant waived his right to an identity and preliminary hearing. Waivers executed by counsel with consent of defendant. Government moved for detention; oral motion for detention granted. Defendant requested that the detention hearing be held in Northern District of Ohio; Detention Hearing set for 5/06/2021 at 1:00 PM to be held by video conference (Akron) before Magistrate Judge Kathleen B. Burke. Pursuant to the Due Process Protections Act, the Court reminds the government of its obligations under Brady v. Maryland, 373 U.S. 83 (1963), to disclose evidence favorable to the defendant and material to the defendant's guilt or punishment.

[Query](#) [Reports](#) [Utilities](#) [Help](#) [What's New](#) [Log Out](#)

		information, exclusion of government evidence or witnesses, adverse jury instructions, dismissal of charges, contempt proceedings, sanctions by the Court, or any other remedy that is just under the circumstances. Defendant remanded to the custody of U.S. Marshal pending further proceedings. ( Court Reporter ECRO: K. Orozco; AUSA: Jacob Strain listening to hearing; Pretrial Services Officer: Julie Gray) Time: 15 minutes. (P,G) (Entered: 05/03/2021)
05/03/2021	<a href="#">2</a>	CJA 23 Financial Affidavit by John Douglas Wright (1). Magistrate Judge Kathleen B. Burke on 5/3/2021. (P,G) (Entered: 05/03/2021)
05/03/2021	<a href="#">3</a>	Waiver of Rule 5(c)(3) Hearing (Identity and Preliminary Hearing) by John Douglas Wright (1). (P,G) (Entered: 05/03/2021)
05/03/2021	<a href="#">5</a>	<b>Due Process Protections Act Notice and Order:</b> Pursuant to the Due Process Protections Act, the Court reminds the government of its obligations under Brady v. Maryland, 373 U.S. 83 (1963), to disclose evidence favorable to the defendant and material to the defendant's guilt or punishment. The government is ordered to comply with Brady and its progeny. The failure to do so in a timely manner may result in consequences, including dismissal of the indictment or information, exclusion of government evidence or witnesses, adverse jury instructions, dismissal of charges, contempt proceedings, sanctions by the Court, or any other remedy that is just under the circumstances. Magistrate Judge Kathleen B. Burke on 5/3/2021. (P,G) (Entered: 05/03/2021)
05/03/2021	<a href="#">6</a>	<b>Order</b> of Temporary Detention as to John Douglas Wright (1). Magistrate Judge Kathleen B. Burke on 5/3/2021. (P,G) (Entered: 05/03/2021)
05/04/2021		<b>IMPORTANT:</b> Notice [non-document] as to John Douglas Wright (1). Due to scheduling conflicts the Detention Hearing is now set for 5/6/2021 1:30 PM in to be held by video conference (Akron) before Magistrate Judge Kathleen B. Burke. Note change in time only. Counsel can login at 1:15 p.m. to meet privately with defendant.(P,G) (Entered: 05/04/2021)
05/06/2021		<b>Minutes of proceedings</b> [non-document] before Magistrate Judge Kathleen B. Burke. Video Detention Hearing as to John Douglas Wright (1) held on 5/6/2021. AUSA Brian Deckert and Jacob Strain present on behalf the government. Attorney Noah Munyer on behalf of the defendant, who was also present. Defendant consented on the record to this proceeding being conducted via video conference. Defendant waived reading of Indictment and entered a plea of not guilty to all counts as contained therein. As to the Detention hearing, proffers and arguments presented by both sides. The Court finds the government has not met its burden and denies the motion for detention. Defendant to be released on a \$50,000 unsecured Bond with standard and special conditions. Defendant to be released after completion of home inspection on residence. (Court Reporter ECRO: K. Orozco; Pretrial Officer: Julie Gray) Time: 65 minutes. (P,G) Modified text on 5/12/2021 (D, I). (Entered: 05/06/2021)
05/07/2021	<a href="#">7</a>	Appearance Bond Entered as to John Douglas Wright (1) in amount of \$ 50,000, unsecured. (P,G) (Entered: 05/07/2021)
05/07/2021	<a href="#">8</a>	<b>Order</b> Setting Conditions of Release. Magistrate Judge Kathleen B. Burke on 5/7/2021. (P,G) (Entered: 05/07/2021)
05/07/2021	<a href="#">9</a>	Order requiring a Defendant to appear in the district where charges are pending as to John Douglas Wright (1). Magistrate Judge Kathleen B. Burke on 5/7/2021. (P,G) (Entered: 05/07/2021)
05/07/2021		Notice to District of Columbia of a Rule 5 or Rule 32 Initial Appearance as to John



[Query](#) [Reports](#) [Utilities](#) [Help](#) [What's New](#) [Log Out](#)

		following document link(s) is also provided: <a href="#">3</a> Waiver of Rule 5(c)(3) Hearing, <a href="#">8</a> Order Setting Conditions of Release, <a href="#">9</a> Commitment to Another District, <a href="#">6</a> Order of Detention, <a href="#">1</a> Rule 40 Warrant from Another District, <a href="#">5</a> Order,, <a href="#">7</a> Bond. If you require certified copies of any documents, please send a request to ohndml_InterDistrictTransfer@ohnd.uscourts.gov. If you wish to designate a different email address for future transfers, send your request to InterDistrictTransfer_TXND@txnd.uscourts.gov. (P,G) (Entered: 05/07/2021)
05/13/2021	<a href="#">10</a>	Arrest Warrant from District of Columbia Returned Executed on 5/3/2021 in case as to John Douglas Wright (1). (O,K) (Entered: 05/14/2021)