

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.

William Rogan Reid
DOB: XX/XX/XXXX

Case: 1:21-mj-00338
Assigned to: Judge Faruqui, Zia M.
Assign Date: 4/5/2021
Description: COMPLAINT W/ARREST WARRANT

Defendant(s)

AMENDED 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. § 1512(c)(1) - Corruptly Altering, Destroying, Mutilating, or Concealing a Record, Document, or Other Object,

18 U.S.C. §§ 1752(a)(1)and (2) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority,

40 U.S.C. §§ 5104(e)(2)(D) and (G) - 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.

Matthew Jones (handwritten signature)

Complainant's signature

Matthew Jones, 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: 04/05/2021



Zia M. Faruqui (handwritten signature)

2021.04.05

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Judge's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge

Printed name and title

STATEMENT OF FACTS

Your affiant, Matthew Jones, is a Special Agent with the Federal Bureau of Investigation (“FBI”) and I am currently assigned to the FBI’s Miami Field Office. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. 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 violations 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 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.

On January 6, 2021, a joint session of the U.S. Congress convened at the U.S. 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 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.

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

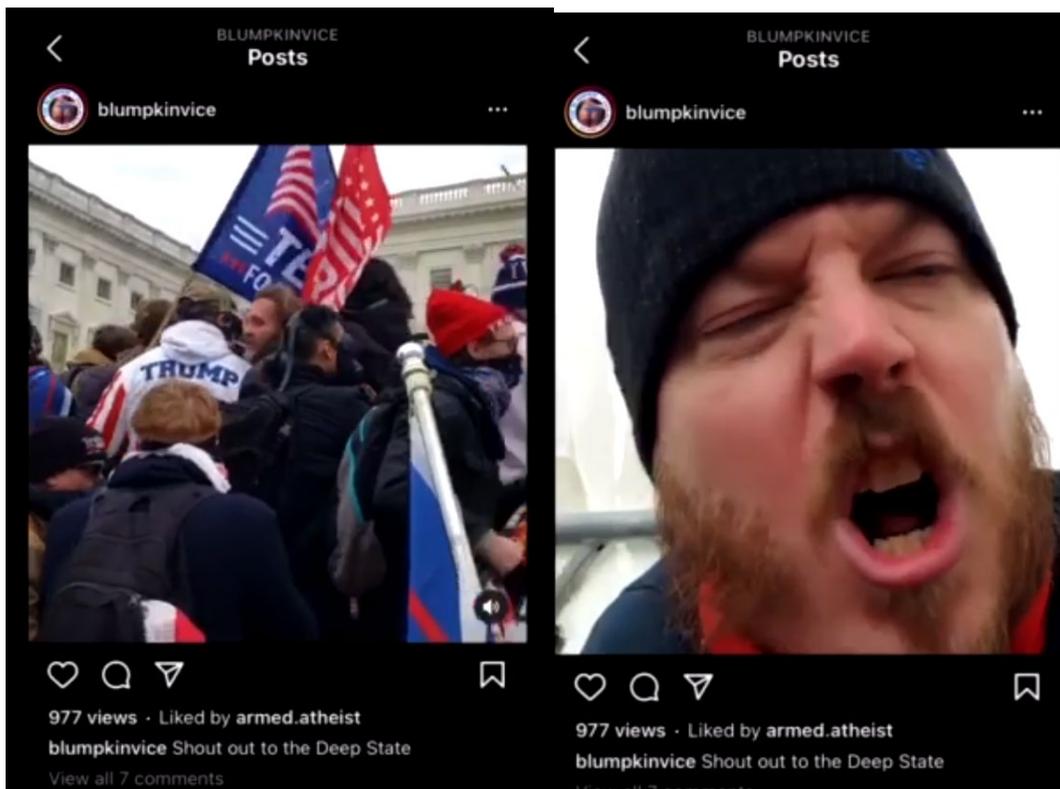
violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

Evidence Linking WILLIAM ROGAN REID to Assault on the U.S. Capitol

On or about January 29, 2021, the FBI received a tip from an individual (“Person 1”) stating that an individual known to Person 1 as WILLIAM ROGAN REID, who lives in Florida, was at the U.S. Capitol building on January 6, 2021.

On or about February 11, 2021, the FBI interviewed Person 1 by telephone. Person 1 said he/she knew REID personally, knew REID’s voice, and had observed on REID’s old Instagram account a video that appeared to have been taken by REID showing other people inside the U.S. Capitol Building on January 6, 2021. Person 1 said that REID’s voice could be heard on the video. On or about March 7, 2021, Person 1 advised that REID had a new Instagram account under the username “blumpkinvice.”

Person 1 provided the FBI with a copy of Instagram posts on the “blumpkinvice” account. One such post is a video of the rioters at the U.S. Capitol on January 6, 2021. Later in the video, the camera is turned around, consistent with the use of a cellphone, to show an individual resembling REID. Screenshots from this video are shown below.



Another post on the “blumpkinvice” Instagram account is a video with the words “Domestic Terrorism” displayed and in which an individual resembling REID states, in part, “I want to say prison would be fun, but you’re not going to incarcerate me, motherfuckers. The 6th

was a warning.” The video appears to have been created with a cellphone that REID was pointing at himself. A screenshot from the video is below.



On or about March 24, 2021, I reviewed publicly available video footage taken from inside the U.S. Capitol on January 6, 2021. In the video, an individual resembling REID appears at approximately 9 minutes and 41 seconds into the video. Below is a screenshot from the video as well as a magnification of the video showing REID’s face.

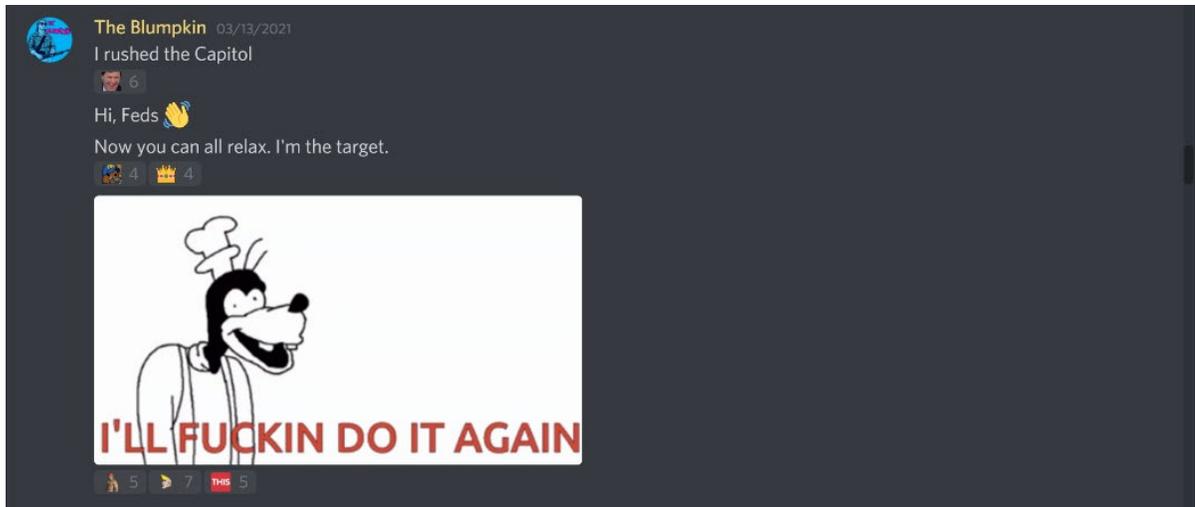




I have compared images of the person in this video against the photograph of REID maintained by the Florida Department of Highway Safety and Motor Vehicles (“DHSMV”) and it appears to be the same person. The address REID provided to the DHSMV is a residence in Davie, Florida 33328 (the “Residence”).¹

On or about March 24, 2021, I reviewed the Instagram account “blumpkinvice,” an open account viewable by the public. On this account, I found a link to a Discord account called “the blumpkin#4602” which is also an open account viewable by the public. In a post dated March 11, 2021, the user of the account stated “The 6th was the breaking point for a lot of people but they’re cowering in fear again because of incaereration [sic]” In another post dated March 11, 2021, the user of the account stated “The 6th was our Boston Tea Party.” In a post dated March 13, 2021, the user of the account stated “I rushed the Capitol” “Hi, Feds” “Now you can all relax, im the target.” “I’LL FUCKIN DO IT AGAIN”

¹ The full address with street number and street name is included in the DHSMV records, but is not used here as this document will be filed on the public docket.



Records obtained from Instagram show that the user of the “blumpkinvice” account provided a phone number ending in -3559.

Records obtained from AT&T show that the subscriber of the phone number ending in -3559 is “Rogan Reid” at the Residence. These records also show that the cellphone associated with the -3559 number is a Samsung cellphone.

According to records obtained through a search warrant which was served on AT&T, on January 6, 2021, in and around the time of the incident, the cellphone associated with the phone number ending in -3559 was identified as having utilized a cell site consistent with providing service to a geographic area that includes the interior of the U.S. Capitol building.

On March 26, 2021, Magistrate Judge G. Michael Harvey in the United States District Court for the District of Columbia authorized a criminal Complaint and corresponding arrest warrant charging REID with: (1) knowingly entering or remaining in any restricted building or grounds without lawful authority to do so and engaging in disorderly or disruptive conduct therein, in violation of Title 18, United States Code, Section 1752(a)(1) and (2); and (2) willfully and knowingly uttering loud, threatening, or abusive language, or engaging 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, in violation of Title 40, United States Code, Section 5104(e)(2)(D) and (G) (“Original Offenses”).

On March 29, 2021, U.S. Magistrate Judge Zia M. Faruqui in the United States District Court for the District of Columbia issued a search warrant for cellsite information for the cellphone associated with the phone number ending in -3559, believed to be used by REID. Records obtained pursuant to the search warrant indicated that the cellphone was being kept at the Residence.

On March 30, 2021, U.S. Magistrate Jared M. Strauss in the United States District Court for the Southern District of Florida issued a search warrant for the Residence and any electronic devices contained therein containing evidence relating to REID's commission of the Original Offenses.

On April 1, 2021, at approximately 5 a.m., cellsite data for REID's cellphone indicated the phone utilized a cell site consistent with providing service to a geographic area that includes the Residence. At approximately 6:05 a.m., cellsite data for REID's cellphone continued to indicate that the phone was identified as having utilized a cell site consistent with providing service to a geographic area that includes the Residence. At approximately 6:13 a.m., law enforcement arrived at the Residence and announced to its occupants that it had an arrest warrant for REID and a search warrant for the Residence.

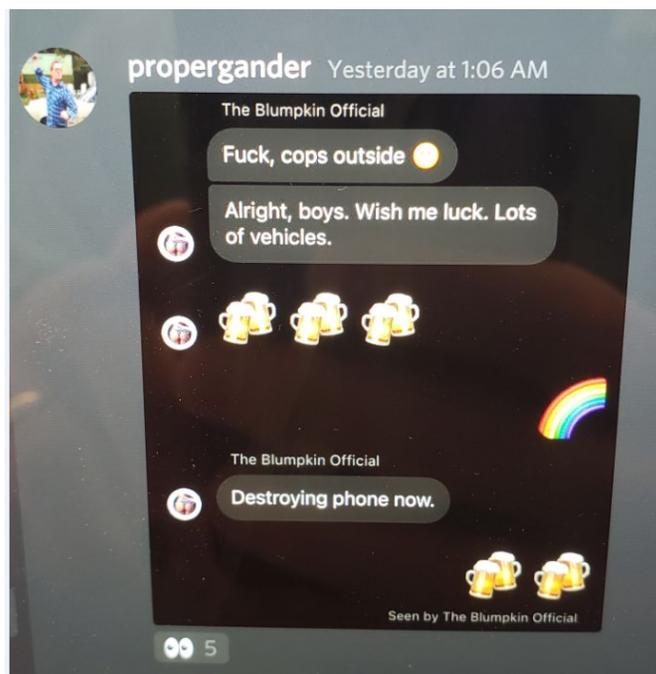
Although the cellular phone had been emitting regular signals approximately every 15 minutes, at 6:21 a.m. (approximately 8 minutes after law enforcement announced their presence at the door of the Residence) a notification was received from the cell network indicating the phone was either turned off or out of service. No signals were received from the phone after 6:05 a.m.

REID exited the Residence at approximately 6:30 a.m. and was arrested. Law enforcement proceeded to execute the search warrant. As part of executing the search warrant, law enforcement advised REID that the search warrant extended to electronic devices within the Residence and asked where REID's cellphone was located. REID initially claimed that he had left his cellphone at a friend's house but later claimed that he did not know where the cellphone was.

Law enforcement proceeded to search the Residence. Upon entry, law enforcement observed that the Residence was filled with an excessive accumulation of items, consistent with a persistent refusal to discard or part with possessions. Nevertheless, in the room identified as REID's bedroom, law enforcement found, in open view on a dresser, an iPad and a wallet containing REID's personal items. In addition, law enforcement found a charger for a Samsung cellphone still plugged into the wall next to REID's bed. Law enforcement proceeded to search the Residence as thoroughly as possible in light of its condition and the volume of materials in each of the rooms, but was unable to find REID's cellphone after a diligent search.

REID was subsequently transported to the FBI Office for processing. Thereafter, REID was transported to the Broward County Jail. During the ride, in an unsolicited statement, REID voluntarily told law enforcement that early in the morning on April 1, 2021, he had posted a message on social media to the effect that he was going to destroy his cellphone because the FBI was "after him." REID also stated that the post was meant as an April Fool's joke.

On April 2, 2021, I accessed a Discord channel that is linked by REID's Instagram page. I observed that at approximately 1 a.m. on April 1, 2021, a member of the channel posted an image of a conversation with an account called "The Blumpkin Official" which shares a similar name with REID's Discord account. In the embedded conversation, "The Blumpkin Official" stated "Fuck, cops outside. Alright, boys. Wish me luck. Lots of vehicles" and "Destroying phone now."



Based on the aforementioned evidence, there is probable cause to believe that REID was present inside the U.S. Capitol on January 6, 2021 during the riot and related offenses that occurred at the U.S. Capitol Building on January 6, 2021 and participated in the obstruction of the Congressional proceedings. In addition, there is probable cause to believe that REID concealed and/or destroyed his cellphone in order to render it unavailable for use in an official proceeding.

Your affiant submits that there is also probable cause to believe that WILLIAM ROGAN REID 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 WILLIAM ROGAN REID violated 40 U.S.C. § 5104(e)(2)(D) and (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.

Your affiant submits there is also probable cause to believe that WILLIAM ROGAN REID violated 18 U.S.C. § 1512(c)(1), which makes it a crime to corruptly alter, destroy, mutilate, or conceal a record, document, or other object, or attempt to do so, with the intent to impair the object's integrity or availability for use in an official proceeding.



Matthew Jones, 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 5th day of April, 2021.



2021.04.05

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ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE