

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America  
v.  
LAWRENCE DROPKIN JR  
DOB: XXXXXX

*Defendant(s)*

)  
) Case: 1:21-mj-00601  
) Assigned To : Harvey, G. Michael  
) Assign. Date : 9/13/2021  
) Description: Complaint w/ Arrest Warrant  
)

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)- Entering and Remaining in a Restricted Building or Grounds;  
18 U.S.C. § 1752(a)(2)- Disorderly and Disruptive Conduct in a Restricted Building or Grounds;  
40 U.S.C. § 5104(e)(2)(D)- Disorderly Conduct in a Capitol Building;  
40 U.S.C. § 5104(e)(2)(G)- Parading, Demonstrating, or Picketing in a Capitol Building.

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

Det. Colleen Nase

*Complainant's signature*

Colleen Nase, Detective

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by telephone.

Date: 09/14/2021



Digitally signed by  
G. Michael Harvey

*Judge's signature*

City and state: Washington, D.C.

G. Michael Harvey, U.S. Magistrate Judge

*Printed name and title*

### STATEMENT OF FACTS

Your affiant, Colleen Nase, is a Detective with the New Jersey Office of Homeland Security and Preparedness and a member of the Federal Bureau of Investigation ("FBI") Joint Terrorism Task Force. As such, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, and 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 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 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 after 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.

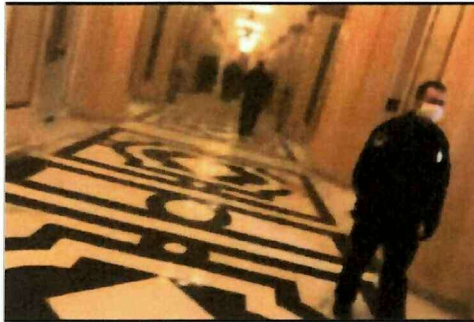
Shortly thereafter, at approximately 2:20 p.m., members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress 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 LAWRENCE DROPKIN JR. to Assault on the U.S. Capitol*

On or about January 7, 2021, the FBI received a tip from an individual known to law enforcement (“Individual-1”) identifying LAWRENCE DROPKIN JR. (“DROPKIN”) as being in the Capitol Building on January 6, 2021. Your affiant subsequently interviewed Individual-1, who has known DROPKIN since childhood and provided your affiant with screenshots from his/her phone. The screenshots were from a FaceTime phone call, which Individual-1 indicated were between DROPKIN and another individual known to both Individual-1 and DROPKIN. Based on your affiant’s experience investigating offenses in connection with the assault on the Capitol on January 6, 2021, your affiant observed that the FaceTime call appeared to have taken place from inside the Capitol Building. Individual-1 identified the individual wearing the red hat as DROPKIN. The screenshots are shown below.



On or about January 22, 2021, another tip was submitted by another individual known to law enforcement (“Individual-2”) to the FBI National Threat Operations Center identifying DROPKIN as being in the Capitol Building on January 6, 2021. Your affiant subsequently interviewed Individual-2, who is related to DROPKIN by marriage and stated that DROPKIN’s father told Individual-2 that DROPKIN was in the Capitol Building, and specifically in Speaker Nancy Pelosi’s office. According to Individual-2, DROPKIN also told DROPKIN’s father that he likely would be spending some time in jail for participating in the protests at the Capitol on January 6, 2021.

Law enforcement obtained from the New Jersey Department of Motor Vehicles (“DMV”) DROPKIN’s driver’s license photograph. Law enforcement also obtained the profile picture associated with the Facebook account identified as “Larry Dropkin.” Law enforcement compared DROPKIN’s DMV photo with the FaceTime screenshot shown above and the Facebook photo for “Larry Dropkin.” The Facebook photo and the FaceTime screenshot appear consistent with the individual in the DMV photo. The Facebook profile picture is shown below.

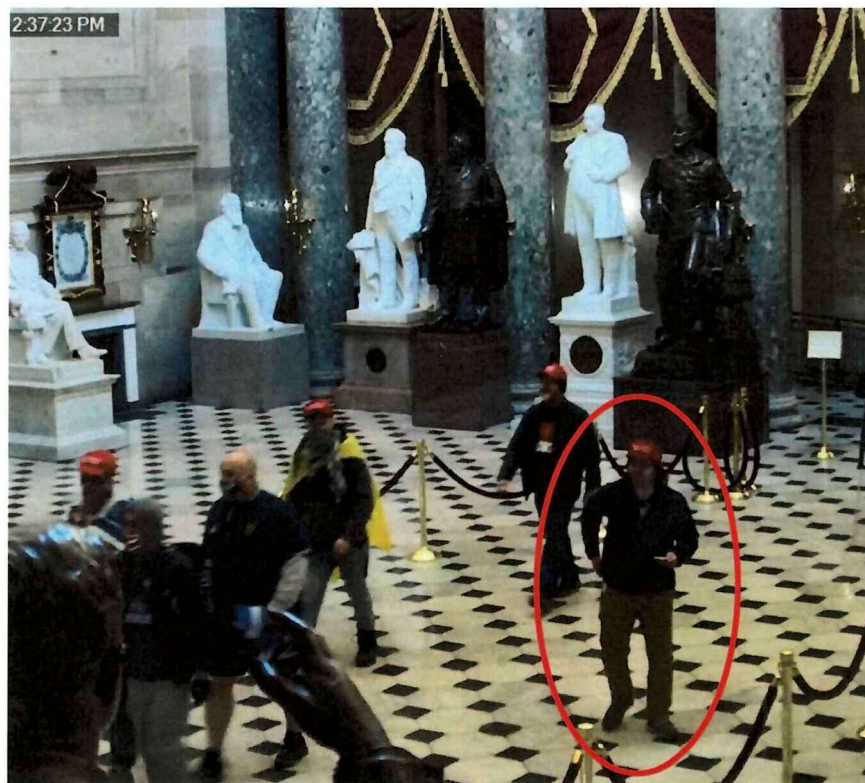




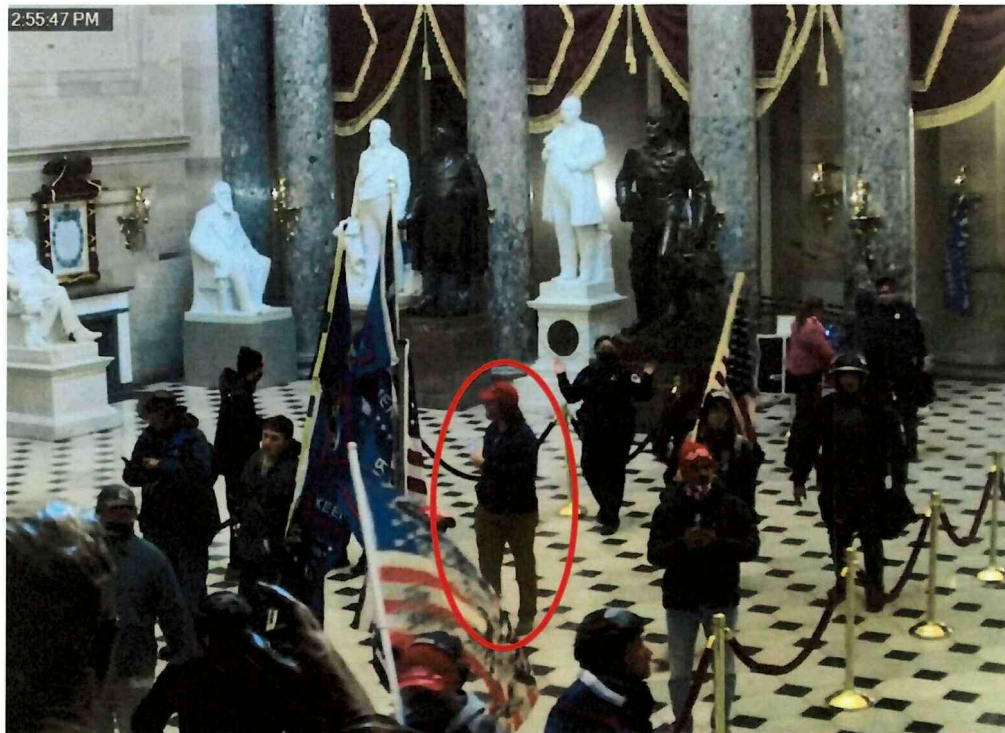
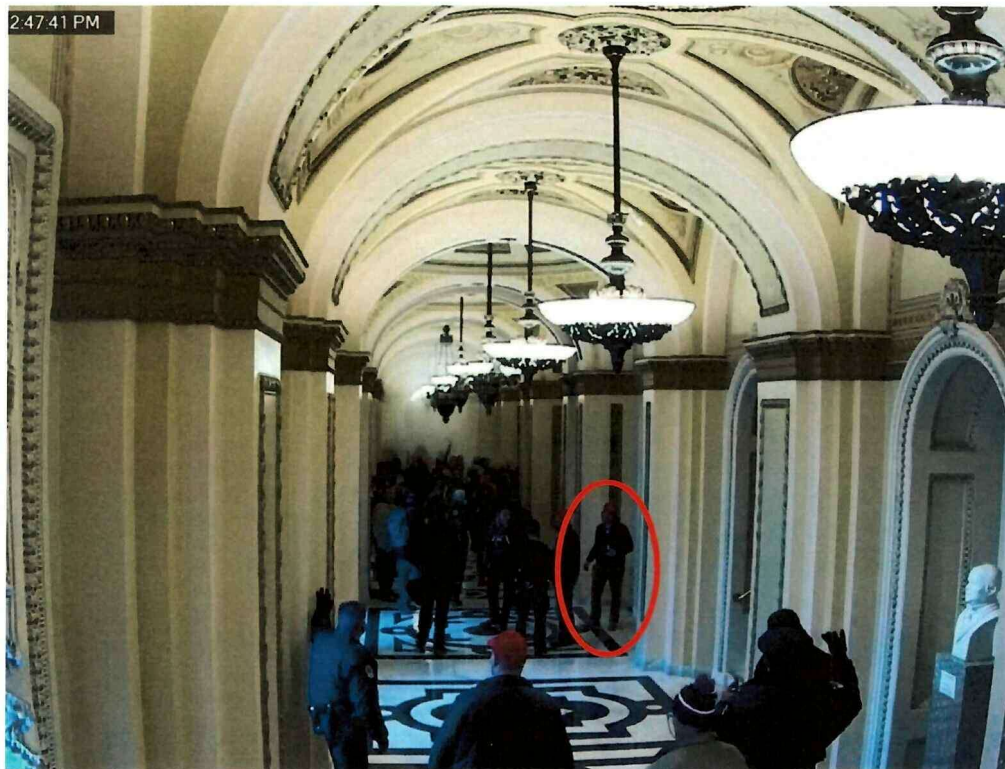
On or about May 20, 2021, law enforcement attempted to interview DROPKIN. Law enforcement positively identified DROPKIN as the individual in FaceTime screenshot taken inside the Capitol Building.

In the course of your affiant's investigation, your affiant has reviewed closed-circuit video ("CCV") from the Capitol Building's security cameras recorded on January 6, 2021. Your affiant observed DROPKIN in several areas of the Capitol Building from on or about 2:26 p.m. to 3:02 p.m. While inside the Capitol Building, DROPKIN is often observed using a cell phone to either take video or photos or communicate with others. DROPKIN is wearing the same red "Make America Great Again Hat" that appears to be in the FaceTime screenshot above, a blue jacket, and light brown pants. DROPKIN is first observed on CCV at approximately 2:26 p.m. He appears with a large crowd moving from the Crypt near the Memorial Doors. The crowd enters and pushes back Capitol Police officers providing security. At approximately 2:33 p.m., DROPKIN walks down a hallway and enters a door on his left. At approximately 2:35 p.m., DROPKIN walks through the National Statuary Hall. At approximately 2:45 p.m., DROPKIN is observed in another hallway. At approximately 2:55, DROPKIN walks back through the National Statuary Hall. At approximately 2:58 p.m., DROPKIN enters the Rotunda, where he remains until law enforcement personnel entered and forced people out at approximately 3:05 p.m. Screenshots from CCV are shown below. DROPKIN is circled in red.











Based on the aforementioned evidence, there is probable cause to believe that LAWRENCE DROPKIN JR. was present inside the U.S. Capitol building during the riot and related offenses that occurred at the U.S. Capitol building, located at 1 First Street, SE, Washington, D.C. 20510 on January 6, 2021 and participated in the obstruction of the Congressional proceedings.

Accordingly, your affiant submits that there is probable cause to believe that LAWRENCE DROPKIN JR. 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 so; 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 LAWRENCE DROPKIN JR. 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.

Det. Colleen Nase

Colleen Nase, Detective  
New Jersey Office of Homeland Security  
and Preparedness  
FBI, Joint Terrorism Task Force

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 14 day of September 2021.

A handwritten signature in blue ink, appearing to read "G. Michael Harvey", is positioned over a circular official seal.

Digitally signed by G.  
Michael Harvey  
Date: 2021.09.14  
10:23:46 -04'00'

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G. MICHAEL HARVEY  
U.S. MAGISTRATE JUDGE