

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

JIA LIU

DOB: XXXXXX

) Case: 1:21-mj-00632
) Assigned to: Judge Meriweather, Robin M.
) Assign Date: 10/20/2021
) 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)- 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.

[Handwritten signature]

Complainant's signature

Nathan Rudnick, 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: 10/21/2021



[Handwritten signature]

2021.10.21

18:20:53 -04'00'

Judge's signature

City and state: Washington, D.C.

Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

STATEMENT OF FACTS

Your affiant, Nathan Rudnick, is a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the New York Joint Terrorism Task Force (JTTF). In my duties as a Special Agent, I have gained training and experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, the exploitation of lawfully obtained evidence and data, and various other procedures. In addition to my regular duties, I am also currently reviewing public tips, videos, and documentation, among other evidence, associated with the riots and civil disorder that occurred on January 6, 2021, in and around the United States Capitol. 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 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 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 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.

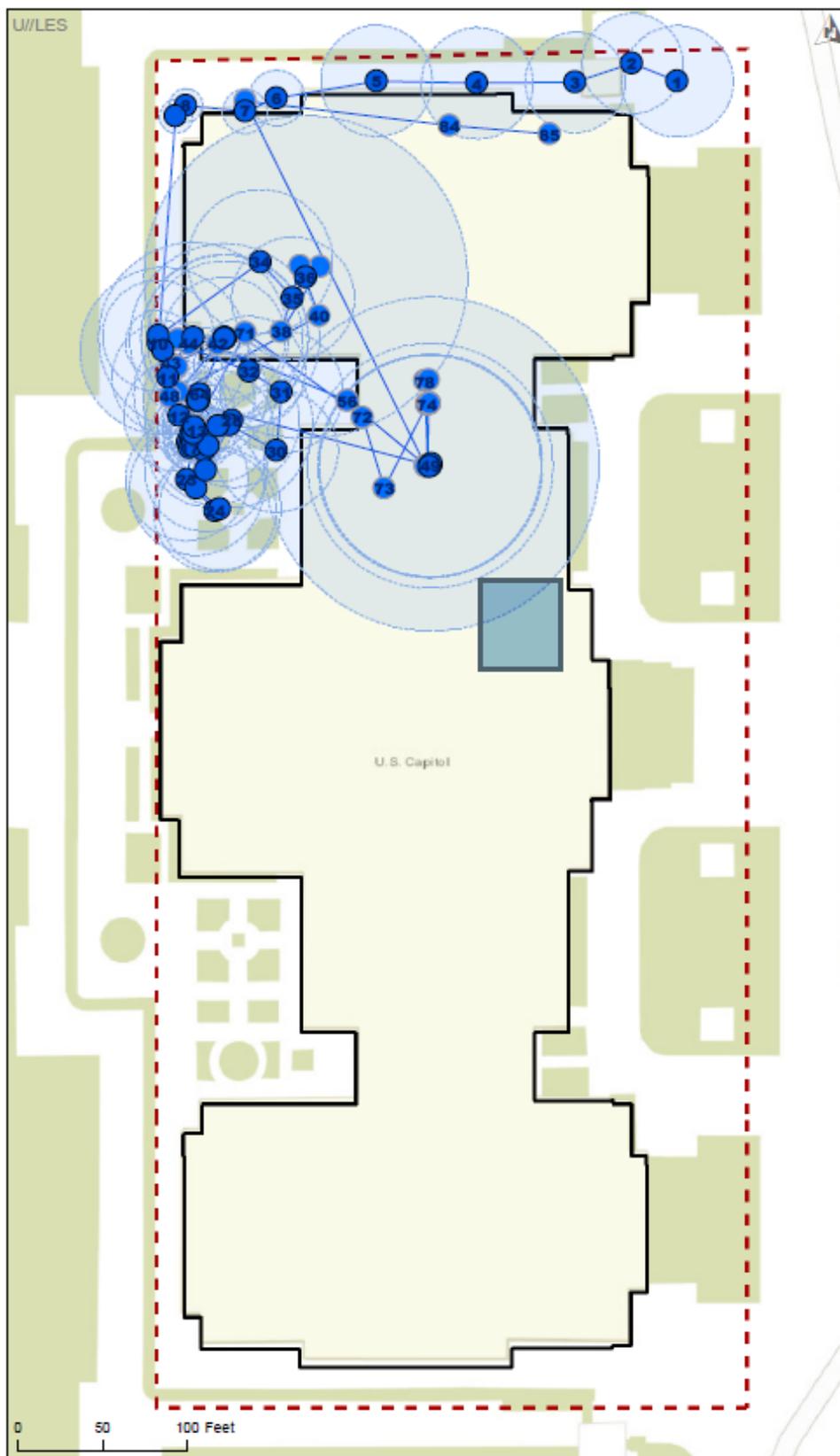
Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress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

According to records obtained through a search warrant which was served on Google, a mobile device associated with Google e-mail address [REDACTED] was present at the U.S. Capitol on January 6, 2021. Google estimates device location using sources including GPS data and information about nearby Wi-Fi access points and Bluetooth beacons. This location data varies in its accuracy, depending on the source(s) of the data. As a result, Google assigns a “maps display radius” for each location data point. Thus, where Google estimates that its location data is accurate to within 10 meters, Google assigns a “maps display radius” of 10 meters to the location data point. Finally, Google reports that its “maps display radius” reflects the actual location of the covered device approximately 68% of the time. In this case, Google location data shows that a device associated with Google e-mail address [REDACTED] and the name “Jah Leo” was within the U.S. Capitol at the times and locations shown in the map below (“Figure 1”). As illustrated in Figure 1, the location data points encompass areas that are both entirely and partially within the U.S. Capitol Building between 2:43:38 PM and 4:32:18 PM (Eastern Time) on January 6, 2021.

Figure 1



According to records provided by Google, e-mail address [REDACTED] is associated with a Google Pay account with the following billing address information: JIA LIU, [REDACTED], telephone number: [REDACTED].¹ Records provided by Google also indicate IP address: [REDACTED] was used to log in to the account associated with e-mail address [REDACTED] on multiple occasions, including as recently as March 27, 2021.

According to records provided by Verizon, IP address: [REDACTED] was associated with customer name 'John Martini' and account address [REDACTED]. According to open source records, 'John Martini' is listed as the owner of the property located at [REDACTED], which is also the billing address listed on the Google Pay account associated with JIA LIU.

According to information provided by T-Mobile, as of February 2020, the subscriber name and address associated with billing for telephone number: [REDACTED] was MEMELOPE LLC², [REDACTED]. Furthermore, the device details for International Mobile Equipment Identifier (IMEI): [REDACTED] were linked to the name 'JAH LEO'.

According to records provided by JPMorgan Chase, "JIA YU LIU" is listed as the sole member for a business account titled MEMELOPE LLC, along with telephone number [REDACTED].³

According to Department of Defense (DoD) records, JIA LIU enlisted in the United States Marine Corps (USMC) Reserves on May 5, 2014 and is currently an E-4 (Corporal) Cyber Network Operator assigned to Direct Support Company, 6th Communication Battalion, Marine Forces Reserve. DoD records indicate JIA LIU provided contact information including an address of [REDACTED], personal email address: [REDACTED] and telephone number: [REDACTED].

United States Capitol Police (USCP) security cameras captured images of individuals unlawfully entering and rioting inside the U.S. Capitol building on January 6, 2021. Based on my knowledge of the events on January 6, 2021, the Senate Wing Door (north side) was a significant point of entry for rioters.

¹ Mr. Liu's address is sometimes listed in records as [REDACTED] and sometimes as [REDACTED]. It is common in the Borough of Queens, New York, for addresses to be listed or reported either with a hyphen or without a hyphen, however both addresses refer to the same physical location.

² According to the New York State Corporation and Business Entity Database, MEMELOPE LLC is an active limited liability company established on February 21, 2020; according to Dun & Bradstreet records, JIA LIU is listed as the Key Principal for MEMELOPE LLC.

³ According to records provided by PayPal, LIU maintains a Venmo account in the name of MEMELOPE and a PayPal account in the name of MEMELOPE LLC.

I have reviewed law enforcement body camera footage and security camera footage covering the Senate Wing Door (north side), and several still images are below (in chronological order). Based on LIU's passport, driver's license, and Department of Defense photographs, your affiant located LIU on law enforcement body camera footage outside the U.S. Capitol building, as well as on U.S. Capitol building security camera footage entering the U.S. Capitol. LIU appears in the stills below dressed in a black jacket with a red, white and blue American flag hood donned over his head. I have compared these images and they are all consistent with LIU. In addition, on July 20, 2021, your affiant met with USMC Reserve personnel familiar with LIU; a USMC Reserve Officer reviewed the following still image taken from law enforcement body camera footage on January 6, 2021 and positively identified the individual in the photo to be LIU:



LIU is observed entering the U.S. Capitol building on two separate occasions. LIU first entered at approximately 3:24 PM and left the Capitol at approximately 3:31 PM by climbing through a broken window. Your affiant has circled LIU in yellow in the images:





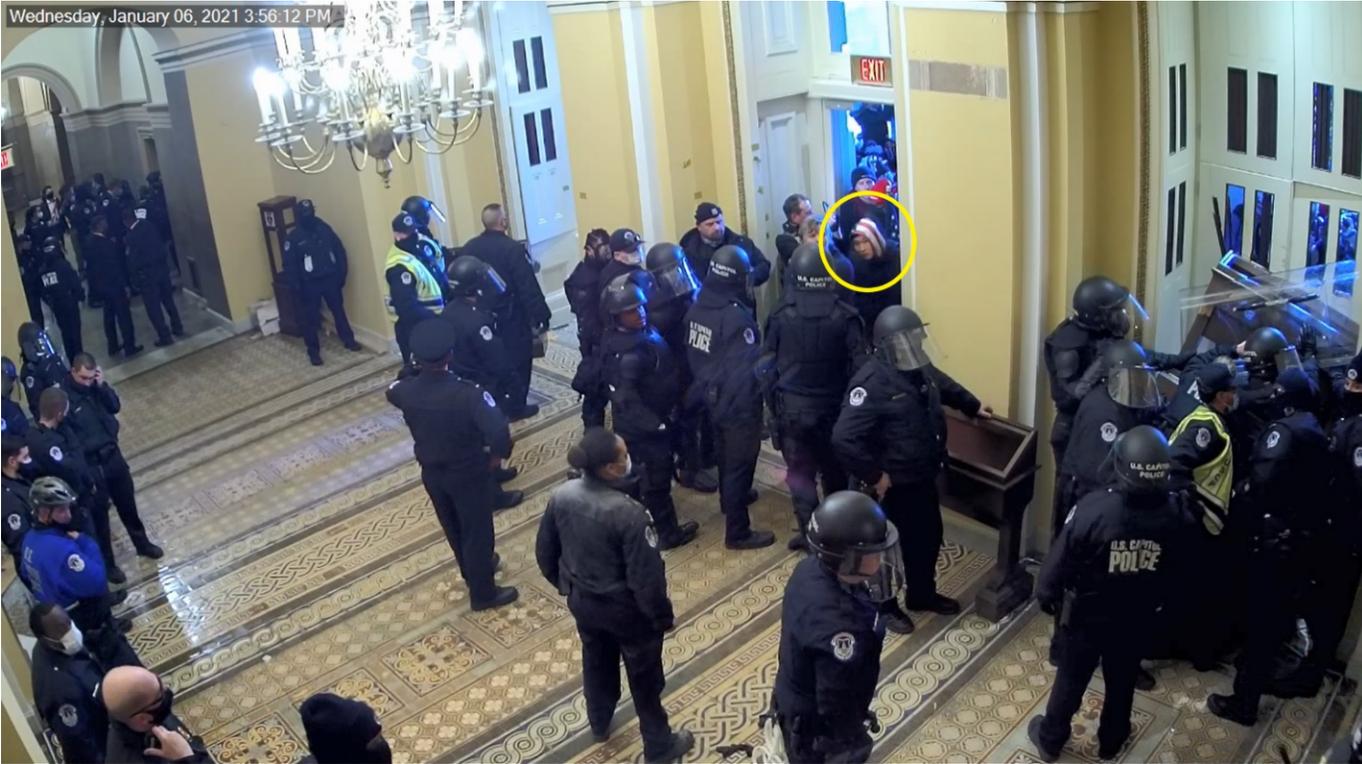




At approximately 3:36 PM, LIU was observed on law enforcement body camera footage on the Upper West Terrace, north side (exterior) of the U.S. Capitol Building, in the area of the Senate Wing Door:



At approximately 3:56 PM, LIU reentered the U.S. Capitol building and left at approximately 4:22 PM. Your affiant has circled LIU in yellow in the following images:





According to New York City Police Department (“NYPD”) license plate reader information, on January 6, 2021, at approximately 5:32 AM, a 2004 Jeep Wrangler (registered to LIU’s stepfather) hit traveling in the Lincoln Tunnel Outbound West Tube, leaving New York City. Additionally, later on January 6, 2021, at approximately 11:55 PM, the same vehicle hit traveling northbound on the George Washington Bridge, Lowel Level into New York City, and again at approximately 12:04 AM (on January 7, 2021) traveling Queens-bound on the Throgs Neck Bridge.

According to financial records, on January 6, 2021, LIU’s credit card was used in two (2) transactions at a BP gas station located in Hauppauge, New York. Also on January 6, 2021, LIU executed two (2) transactions in and around Washington, D.C, including a \$52.98 purchase at a Sunoco gas station.

Based on the foregoing, your affiant submits that there is probable cause to believe that LIU 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 LIU violated 40 U.S.C. § 5104(e)(2)(D), 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.



Nathan Rudnick, 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 21st day of October, 2021.



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ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE