

UNITED STATES DISTRICT COURT

for the
District of Columbia

United States of America
v.
ZVONIMIR JOSEPH JURLINA
DOB: [REDACTED]

)
) Case: 1:21-mj-00502
) Assigned To : Harvey, G. Michael
) Assign. Date : 6/25/2021
) 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:

Table with 2 columns: Code Section, Offense Description. Row 1: 18 U.S.C. §§ 1363 and 2, (Destruction of property in special maritime and territorial jurisdiction and aiding and abetting). Row 2: 40 U.S.C. § 5104(e)(2)(F), (Act of Physical Violence on Grounds)

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Cameron Mizell (handwritten signature)
Complainant's signature

Cameron Mizell, FBI 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: 06/25/2021

G. Michael Harvey (handwritten signature)

Digitally signed by G. Michael Harvey
Date: 2021.06.25 14:32:00 -04'00'

Judge's signature

City and state: Washington, D.C.

G. Michael Harvey, U.S. Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

**I, Cameron Mizell, being first duly sworn, hereby depose and states as follows:**

**PURPOSE OF THE AFFIDAVIT**

1. This affidavit is submitted in support of a Criminal Complaint for ZVONIMIR JURLINA, charging violations of 18 U.S.C. § 1363 and 2, and 40 U.S.C. § 5104(e)(2)(F).

**BACKGROUND OF AFFIANT**

2. I am a Special Agent assigned to the Federal Bureau of Investigation (FBI). I am currently assigned to FBI Washington Field Office (WFO). 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 a violation of Federal criminal laws.

3. Unless otherwise stated, the information in this Affidavit is either personally known to me, has been provided to me by other individuals, or is based on a review of various documents, records, and reports. Because this Affidavit is submitted for the limited purpose of establishing probable cause to support an application for an arrest warrant, it does not contain every fact known by me or the United States. The dates listed in this Affidavit should be read as “on or about” dates. All times provided in this affidavit should be read as “on or about” times and are given in Eastern Standard Time unless otherwise noted.

**STATEMENT OF FACTS SUPPORTING PROBABLE CAUSE*****Background – The U.S. Capitol on January 6, 2021***

4. 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.

5. 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.

6. 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.

7. 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.

8. 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.

9. After the U.S. Capitol was breached, United States Capitol Police (USCP) requested assistance from law enforcement agencies in the area to protect the Capitol, keep people from entering the Capitol, and expel the crowd that was inside the Capitol. Multiple officers with the Metropolitan Police Department and other law enforcement officers came to assist.

10. 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.

11. Additionally, news coverage of January 6, 2021, documented numerous attacks on members of the news media who were present to cover the events at, around, and in the U.S. Capitol building. These included reports of members of the news media being harassed, threatened, robbed, and assaulted based on their perceived roles as journalists, and equipment belonging to several news organizations was stolen, damaged, and/or destroyed.

### ***Facts Specific to This Complaint***

12. At approximately 4:50 p.m., on January 6, 2021, a large crowd made its way to and/or past a media staging area that was set up outside the northeast corner of the U.S. Capitol, on U.S. Capitol grounds. As individuals moved past metal barricades that had been set up around the staging area, media members were forced to flee the area before recovering all their cameras

and associated equipment. Numerous members of the crowd began to destroy the equipment, including cameras, tripods, lights, shades, and remote broadcasting equipment that belonged to various media outlets. Numerous members of the crowd yelled inflammatory rhetoric against the members of the media. One member of the media who was forced to flee the scene estimated that the equipment from his particular news organization that was destroyed was valued at between \$30,000 and \$34,000. The image in Figure 1 depicts the staging area after the members of the news media had been forced to flee.

**Figure 1**

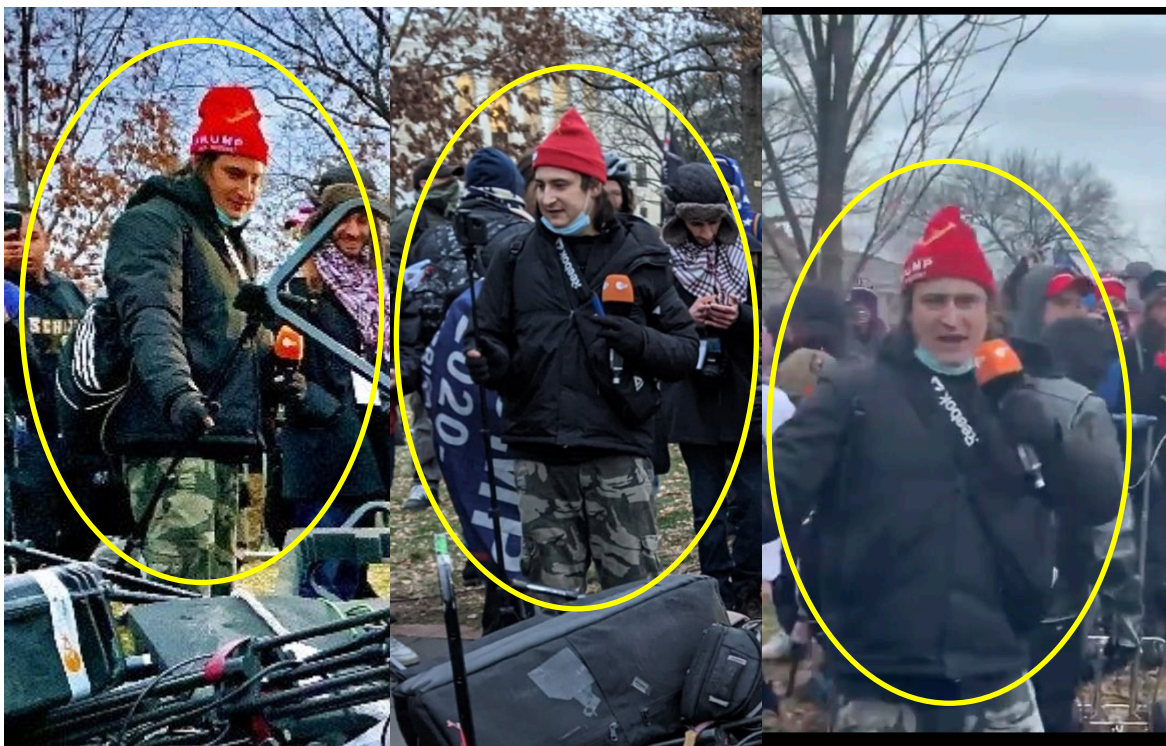


***Jurlina's Role on January 6, 2021***

13. On February 4, 2021, the FBI posted to its website FBI Photographs #205-AOM (“assault on media”) A-D (Figure 2, below), seeking the public’s assistance identifying an individual who participated in an assault on members of the media. As captured in several publicly posted videos and images, the man pictured in FBI Photographs #205-AOM A-D, later identified

as ZVONIMIR JURINA, participated in the assault on the media staging area at the northeast side of the U.S. Capitol at approximately 5 p.m. on January 6, 2021. Specifically, the man depicted in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURINA, kicked and/or stomped on equipment that belong to media outlets, assisted in an attempt to set fire to the pile of destroyed and/or abandoned media equipment, and incited violent acts that caused members of the media to vacate the staging area and abandon their equipment. Additionally, the man depicted in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURINA, verbally encouraged theft of media equipment that was abandoned by media members who fled and appeared to have taken a cordless microphone that belonged to a media outlet to keep as a souvenir.

**Figure 2**



14. The man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, live-streamed events at the U.S. Capitol on January 6, 2021 in a twelve-part video series. The video series was originally posted to YouTube channel “Zykotik” uniform resource locator (“URL”): <https://www.youtube.com/channel/UC6wGXD5S9YwTa7SYD4N08Qw>. The YouTube channel “Zykotik” is still publicly accessible as of the date of this affidavit; however, some of the videos have been removed from the YouTube channel. Law enforcement officers downloaded and retained some of the videos that were removed from the YouTube channel for evidentiary purposes prior to when the videos were removed from the channel.

15. One of the videos in the series, titled: “‘Zykotik’ in DC on Jan. 6, Part 11” located at URL: <https://youtu.be/ZrDckH2Td68>, still publicly available as of the date of this affidavit (not on the “Zykotik” Youtube page but on a YouTube account titled “Sunlight 161” intended to preserve media regarding January 6, 2021), depicts the narrator of the video, believed to be the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, at approximately 3:10 minutes into the video stating, “Yes, Yes! Oh shit. Yo boys, we got...this, this is our fucking shit! Wooo. Wooo. Fuck yeah! Fuck yeah!” At the same time, other participants in the attack on the media were seen stomping on what appeared to be a camera affixed to a tripod.

16. At approximately 3:20 minutes into the same video, a man who appeared to have been a cameraman for a media outlet walked across the forefront of the video and the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, said, “Yo, your camera...is busted boy. Your camera is busted.” At approximately 3:35 minutes into the video, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA,

said, “Yo, I guess we should loot now, right? This is pretty expensive equipment. I’m thinking maybe I should just grab it up and then go to a pawn shop.” At approximately 3:55 minutes into the video, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, stated, “I’ve got a souvenir. Haha.”

17. At approximately 4:00 minutes into the same video, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, turned the camera around to film himself. The man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, was holding in his hand a microphone with an orange top with the logo for ZDF, German based television broadcaster (Figure 3,4, and 5, below). The man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, stated, “This is reporter Zykotik coming to you live. We are, haha. This is the real news media network. We have taken over. This is mother fucking America first. This is how we do it. No more fucking around.”

**Figure 3**



Figure 4

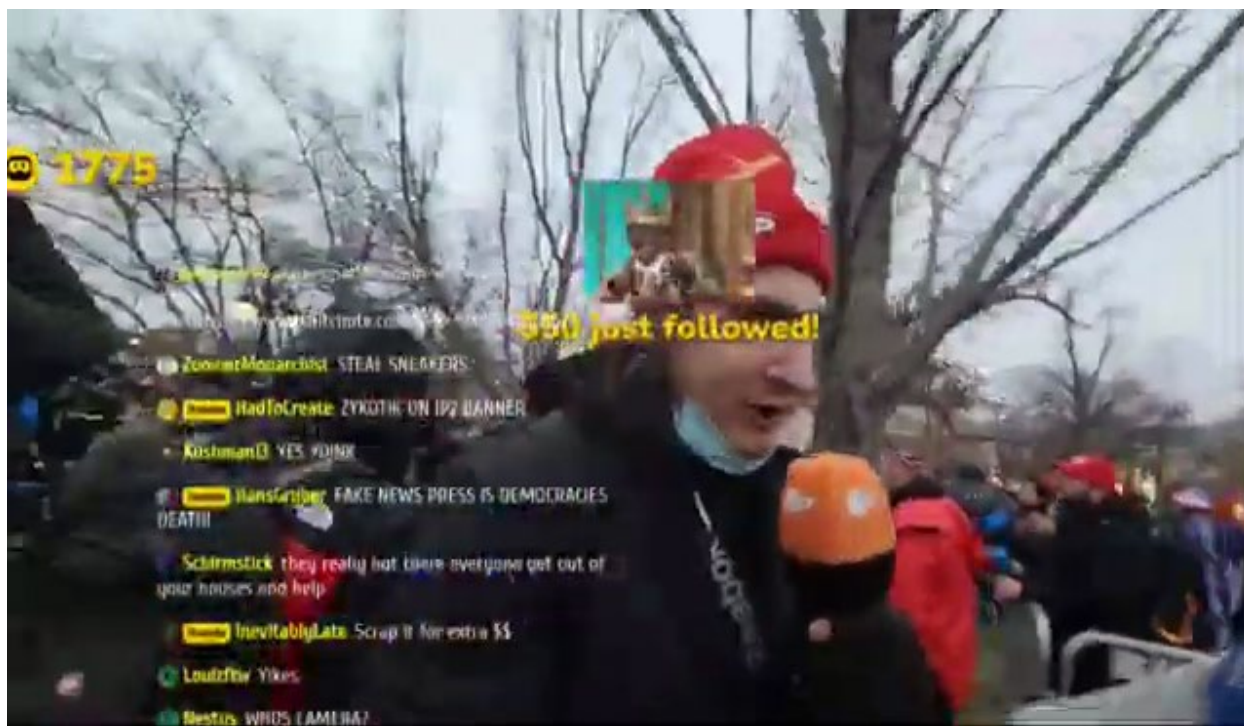
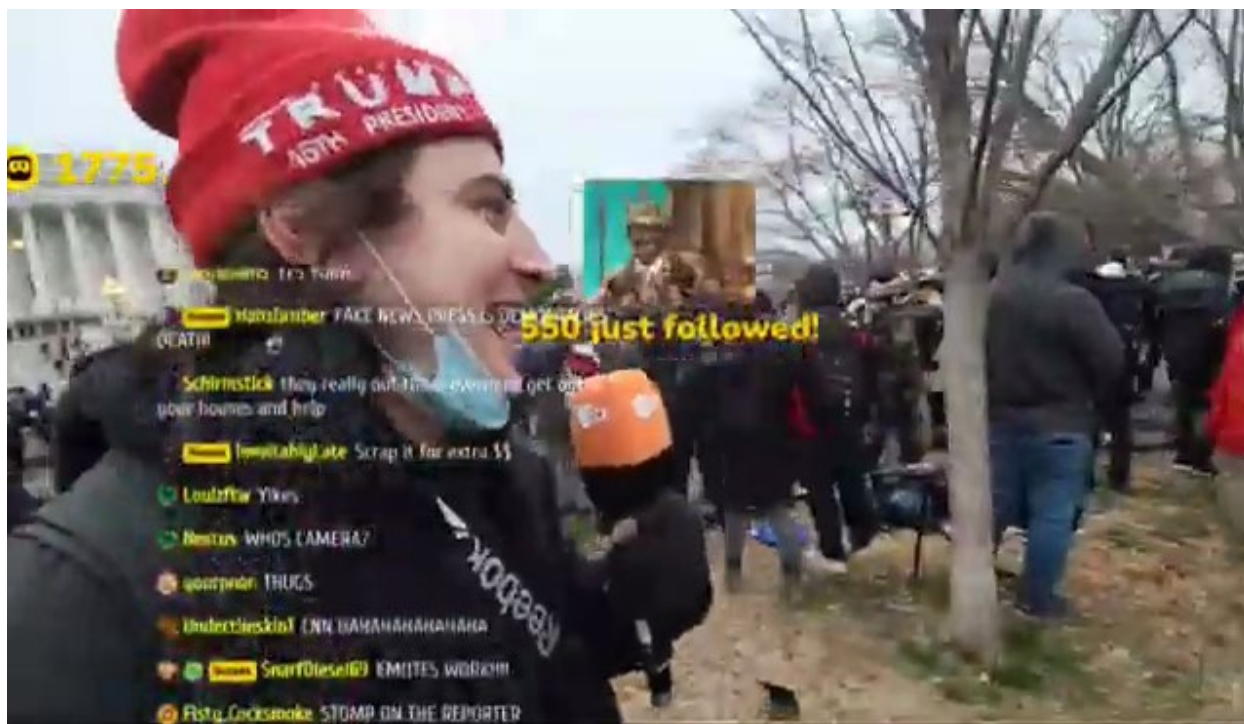


Figure 5



18. At approximately 4:35 minutes into the same video, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, stated, “Sorry folks, we got some breaking news here, we got some breaking news here,” then laughs and twice makes a grunting noise that coincides with the sound of breaking equipment at approximately 4:45 in the same video.

19. A publicly available video posted on Twitter, located at URL: <https://twitter.com/FordFischer/status/1346942284164706306?s=20> depicts the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, who at approximately 1:25 minutes can be seen kicking a piece of media equipment.

20. At approximately 6:49 minutes into the video titled “‘Zykotik’ in DC on Jan. 6, Part 11”, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, can be seen handing a small blue object to a white male in a burgundy-colored sweatshirt (Figure 6 below). The white male in the burgundy-colored sweatshirt was seen a short time later on the video kneeling in an alleged attempt to set fire to the pile of what remained of the media equipment (Figures 7, 8, 9, and 10, below). As the man in the burgundy-colored sweatshirt struggled to light the equipment on fire, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, stated at approximately 7:09 minutes into the same video, “I tried. Little Marco Rubio gave me that lighter.”

21. At approximately 8:37 minutes into the same video, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, stated, “Let’s see if I can help this dude out. Maybe I’ve got a Zippo or something.”

Figure 6

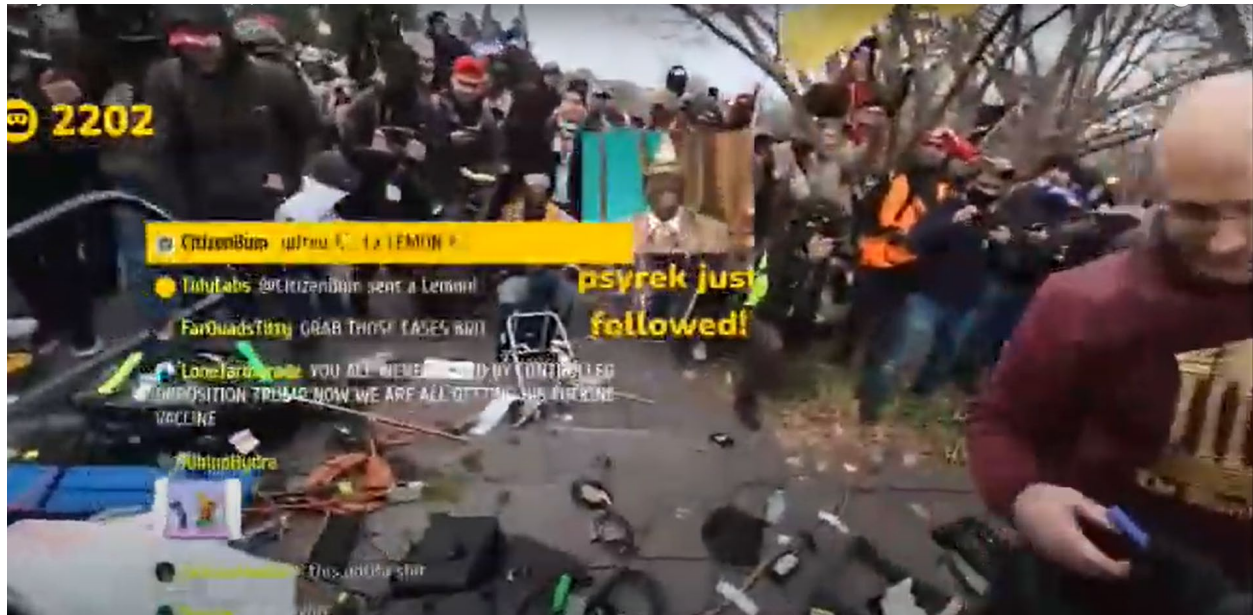


Figure 7

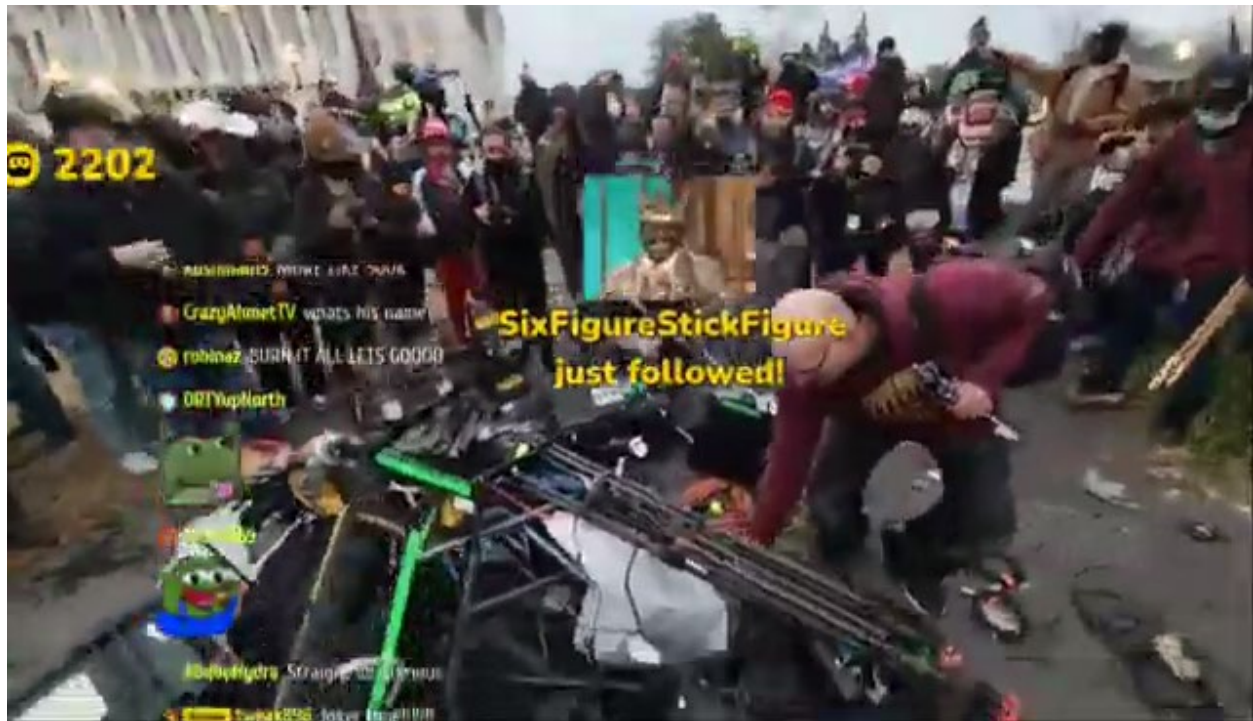


Figure 8

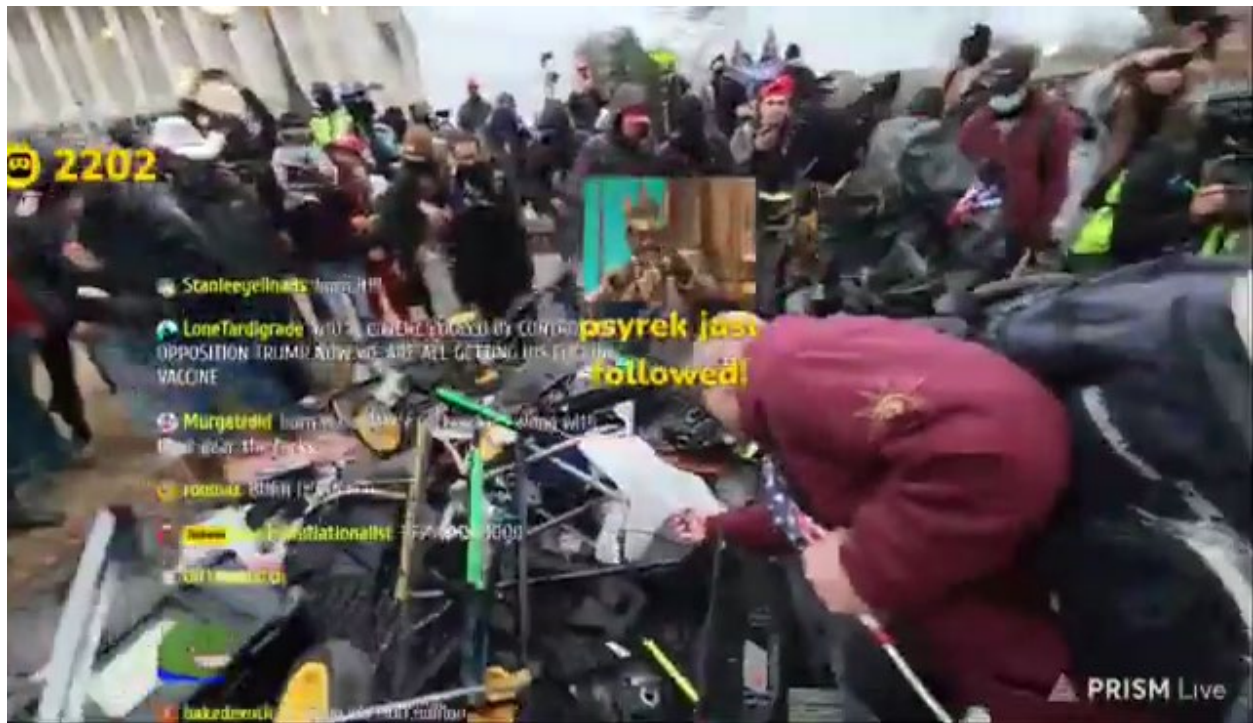


Figure 9

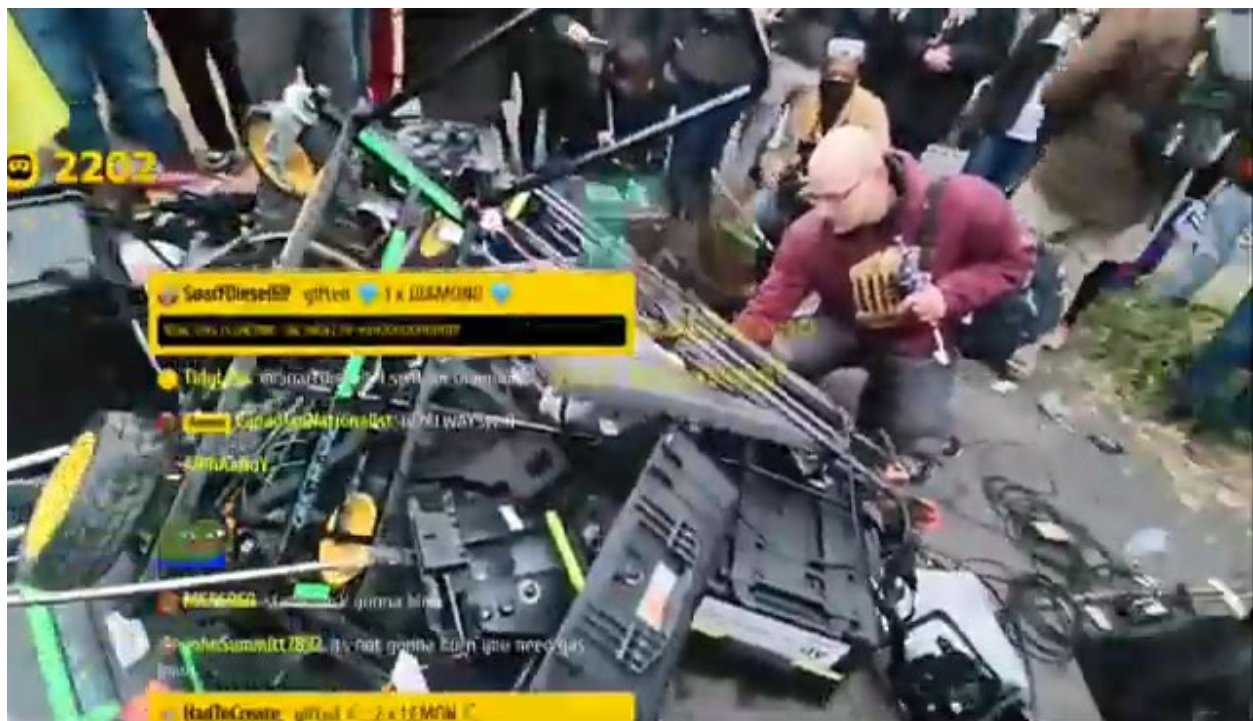


Figure 10



22. At approximately 9:20 minutes into the same video, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, said, “That’s a nice ass bag bro. I might just jack that.” (Figure 11, 12, and 13, below). At approximately 9:50 minutes into the video, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, said, “It’s abandoned property. This is abandoned property. It’s not theft. It’s abandoned property as you can see. They ran away. Right? It’s not theft. It’s not theft. I didn’t ...Zykotik did nothing wrong.”

Figure 11

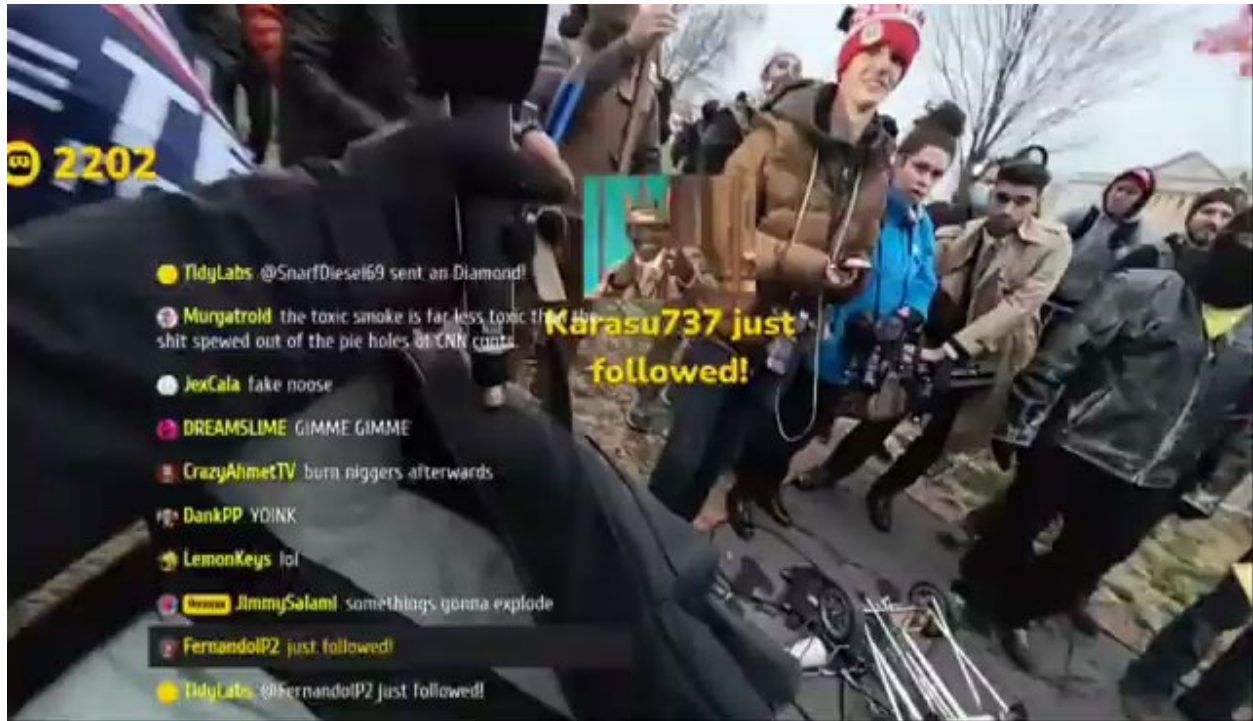


Figure 12

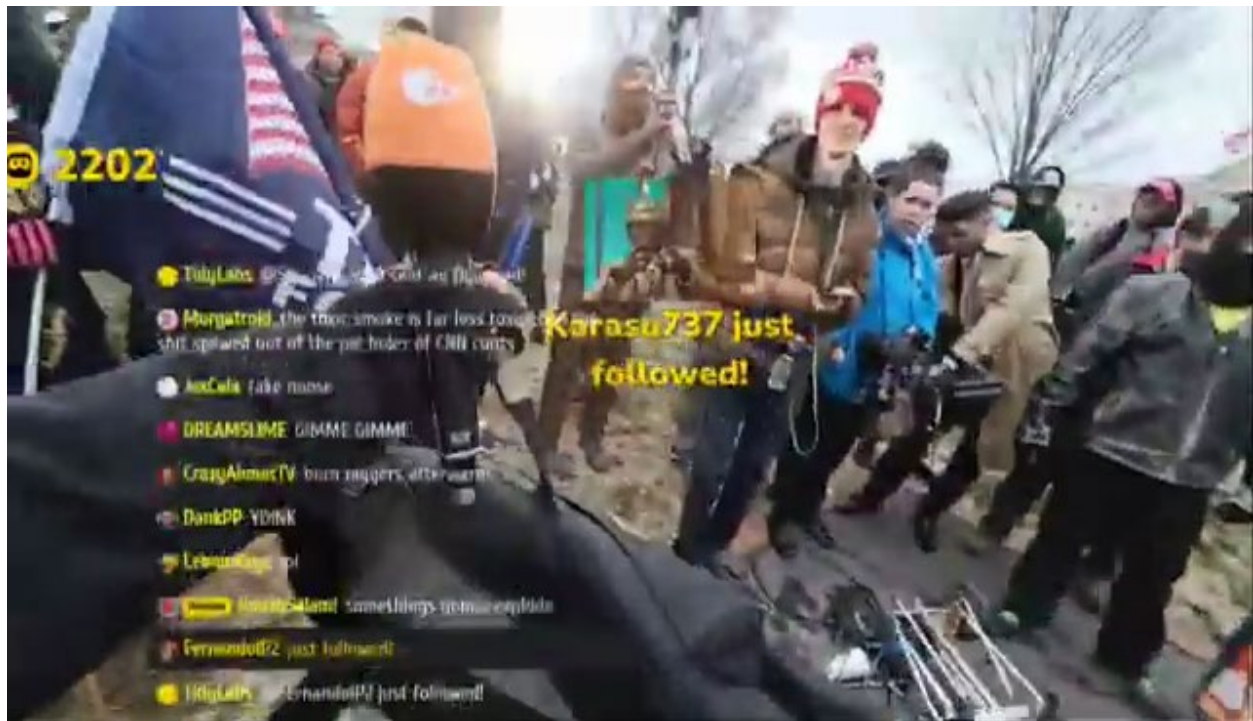
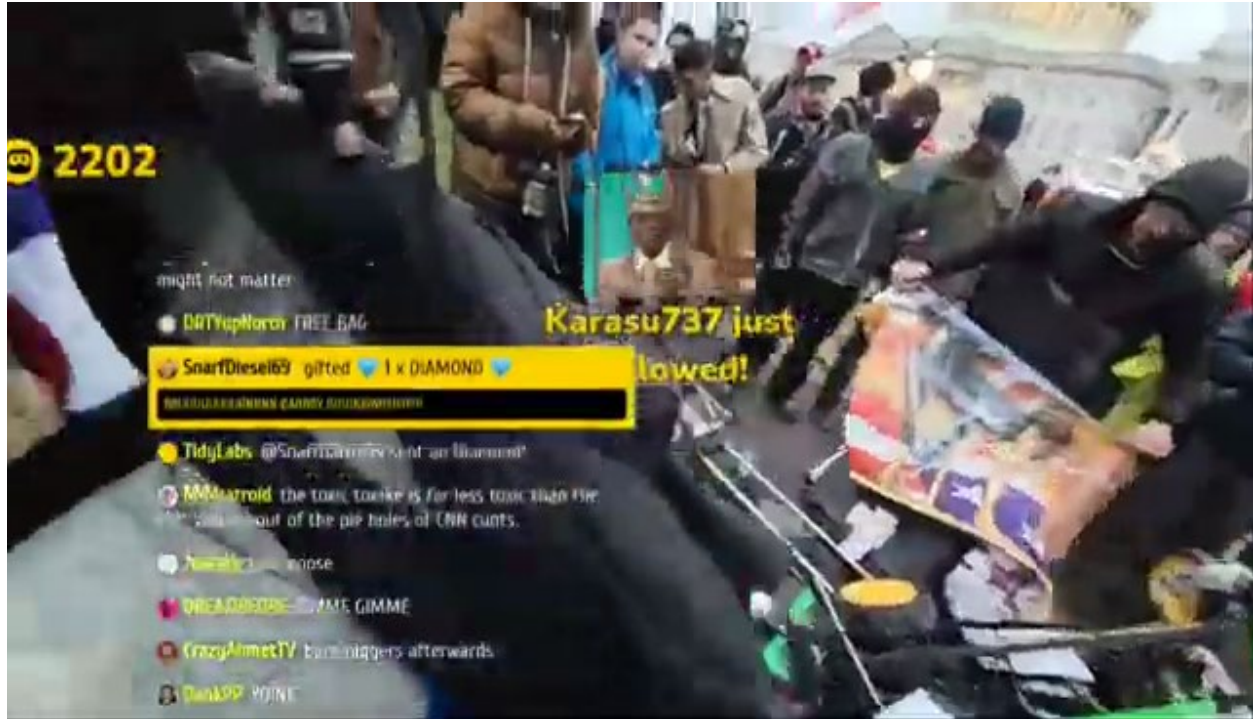


Figure 13



23. A publicly available video posted on Twitter, located at URL: [https://twitter.com/Journo\\_Christal/status/1346945835368501249](https://twitter.com/Journo_Christal/status/1346945835368501249) depicts the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, at approximately 9 seconds into the video handing something to a man in a burgundy-colored sweatshirt (referenced above) who then attempts to set fire to the pile of abandoned media equipment. Prior to handing something to the man in the burgundy-colored sweatshirt, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, appeared to have lit what appeared to be a cigarette, leading to the inference that he possessed the lighter prior to handing the lighter to the man attempting to set fire to the media equipment.

24. A video that was originally located at URL: <https://youtu.be/PEoAyaJsprc>, titled “Zykotik’ in DC on Jan. 6, Part 12,” was removed as of the date of this affidavit, but was

downloaded and preserved by law enforcement for evidentiary purposes. The video was posted on the YouTube channel “Zykotik.” At approximately 0:24 minutes into the video, the man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, said, “I already got the microphone. The microphone’s enough.” An unidentified male on the video stated, “Some guy got a camera.” The man pictured in FBI Photographs #205-AOM A-D, later identified as ZVONIMIR JURLINA, replied, “Oh, he got a camera? The whole thing? That was probably the guy I told...I was like yo...we should just like take this. This is pretty expensive shit. I bet you that dude was like, yeah. That was like...how much you think? Maybe like fucking \$5,000 or something?”

***Jurlina’s Identification***

25. Subscriber records from Google for YouTube channel profile “Zykotik” identified a creation date of March 4, 2019, a birth date of January XX, 1990, a signup Gmail address, and a signup IP address which resolves to Hicksville, New York.

26. Subscriber records from Google for the email address associated with the YouTube channel profile identified a creation date of March 4, 2019, an account recovery phone of (516) 840-XXXX, a signup IP address which resolves to Hicksville, New York, and a last login IP address of February 15, 2021, which resolves to Brooklyn, New York.

27. Subscriber records from AT&T for phone number (516) 840-XXXX identified a contact name of M.J., and address XXX located in Glen Head, New York.

28. A database query for the contact name associated with the above AT&T account in New York identified the same name, with the surname JURLINA, a date of birth (DOB) April XX, 1962, and two probable current addresses, to include the same address located in Glen Head, New York, as well as a specific address in Bethpage, New York. Your affiant believes that this

identified person associated with the AT&T account as well as the two addresses above is a direct relative of ZVONIMIR JURLINA.

29. A database query for the number (516) 840-XXXX identified the name associated with the phone number of ZVONIMIR JURLINA, DOB February XX, 1990, with the same Bethpage address described above.

30. A database query for the name ZVONIMIR JURLINA in New York also produced one result of ZVONIMIR JOSEPH JURLINA, with the same birthdate of February XX, 1990, with the same Bethpage address listed above.

31. According to records obtained through a search warrant, the cell phone associated with ZVONIMIR JURLINA of (516) 840-XXXX was identified as having utilized a cell site, on January 6, 2021, consistent with providing service to the geographic area that includes the interior of the U.S. Capitol building. A DMV query of the name ZVONIMIR JURLINA with DOB February XX, 1990, produced a DMV photo matching the description and/or image of the man pictured in FBI Photographs #205-AOM A-D based on the comparison. The man pictured in FBI Photographs #205-AOM A-D is very distinctive looking and based on numerous observations of the man pictured in FBI Photographs #205-AOM A-D found in videos believed to be filmed and/or posted publicly by the same individual, as well as videos filmed by others that depict the man pictured in FBI Photographs #205-AOM A-D, the DMV photo for ZVONIMIR JURLINA with DOB February 2, 1990 is believed to be a consistent match to photos and or videos of the individual pictured in FBI Photographs #205-AOM A-D. Specifically, the man pictured in FBI Photographs #205-AOM A-D has pale white skin tone; green-colored eyes; dark hair that is shoulder-length and straight; dark, thick, and bushy eyebrows; and a distinctive long and narrow nose bridge. Additionally, the DMV photo for ZVONIMIR JURLINA with DOB February XX,

1990 depicts an individual with a distinct mole on the right side of his face just below the corner of his mouth. Images and/or photos of the man pictured in FBI Photographs #205-AOM A-D depict a man with the same distinctive mole.

32. Based on all of the foregoing information, as well as my training and experience, I respectfully submit that there is probable cause to believe that JURLINA violated Title 40 U.S.C. § 5104(e)(2)(F) which makes it a crime to (F) engage in an act of physical violence in the United States Capitol Grounds.

33. Finally, I respectfully submit that there is probable cause to believe that JURLINA violated Title 18 U.S.C. §§ 1363 and 2, which makes it a crime to, within the special maritime and territorial jurisdiction of the United States, such as within the United States Capitol Grounds, willfully and maliciously destroy or injure any structure, conveyance, or other real or personal property, or attempt or conspire to do so (or aid and abet such a crime). The U.S. Capitol and the U.S. Capitol grounds are federal property within the special maritime or territorial jurisdiction of the United States.

  
SPECIAL AGENT CAMERON MIZELL  
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 25th day of June 2021.



Digitally signed by G. Michael  
Harvey  
Date: 2021.06.25 14:30:27 -04'00'

G. MICHAEL HARVEY  
U.S. MAGISTRATE JUDGE