

LARRY LUCAS STATEMENT OF FACTS

1. I, [REDACTED], am a Special Agent with the Federal Bureau of Investigation (FBI) and have been for over one (1) year. Prior to my employment as a Special Agent, I operated as a fully sworn law enforcement officer in the state of Pennsylvania with the Franklin Park Police Department and the University of Pittsburgh Police Department for over eight years. I am currently assigned to the FBI's Cleveland Division, Painesville Resident Agency. I have used a variety of investigative techniques, including, but not limited to, wiretaps, interviews of witnesses, subjects and confidential informants, physical surveillance, reviews of telephone and financial records, reviews of electronic mail (E-mail) records, and execution of search warrants of physical premises, electronic devices, and social media accounts. As a Special Agent, I am authorized by law or by a Government agency to engage in the prevention, investigation, or prosecution of a violation of Federal criminal laws.
2. The facts in this affidavit come from my review of the evidence, my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts of which I have hearsay knowledge. This affidavit is intended to show simply that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
3. 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.
4. 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.
5. 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.
6. 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.

7. 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.
8. 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.

IDENTIFICATION OF LARRY LUCAS

9. According to records obtained through a search warrant served on Google, a mobile device associated with ljlucasXXX@gmail.com 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 ljlucasXXX@gmail.com was within the U.S. Capitol on January 6, 2021, including the Rotunda and Senate Chamber areas. Google records show that the “maps display radius” for this location data was less than or equal to 100 feet, which encompasses an area that is entirely within the U.S. Capitol Building. On January 6, 2021, LARRY LUCAS was the subscriber of the email address ljlucasXXX@gmail.com.
10. According to records obtained through a search warrant which was served on Verizon through the United States District Court for the District of Columbia for January 6, 2021, in and around the time of the events described in paragraphs 4-7, the cellphone associated with the SMS telephone number XXX-XXX-4333 (“the 4333 phone number”) was identified as having utilized a cell site consistent with providing service to a geographic area that includes the interior of the United States Capitol Building. The dataset reviewed and identified Verizon device ID 35333500000000 for a Samsung Galaxy A50 with a recovery account linked to the 4333 phone number. On January 6, 2021, LARRY LUCAS was the subscriber of the 4333 phone number.
11. Your affiant showed three images (identified below as Image 1, Image 3, and Image 10) of the same individual on U.S. Capitol Grounds and within the restricted perimeter on January 6, 2021 to an individual (“Person 1”) who lived near LARRY LUCAS for a number of years and

had met him multiple times in person. Person 1 immediately identified the person in the photographs at the U.S. Capitol as LARRY LUCAS.

LUCAS'S CONDUCT ON JANUARY 6, 2021

12. Your affiant reviewed both open-source media and CCTV video footage of the events that took place in the U.S. Capitol on January 6, 2021.
13. In the morning of January 6, 2021, LUCAS attended the former President's rally on the national mall in Washington, D.C. As can be seen from the still frames below, which were taken from various open-source videos, LUCAS is observed standing in the crowd in the area of the Washington Monument and then marching toward the Capitol Building. LUCAS is wearing a blue-colored vest, grey hoodie, dark colored pants, a dark neck-gaiter, and a red/white/blue beanie with a white circular logo and "TRUMP" stitched above on the front.



Image 1



Image 2



Image 3



Image 4

14. U.S. Capitol CCTV footage from January 6, 2021, shows LUCAS entered the Capitol Building through the Upper West Terrace door and exited through the Senate Carriage door. Your affiant was able to document LUCAS walking throughout the Capitol Building. LUCAS's total time inside the U.S. Capitol on January 6, 2021, was approximately fourteen minutes and forty-eight seconds.
15. At approximately 2:35 p.m., LUCAS entered the U.S. Capitol Building through the Upper West Terrace Door. Image 5. LUCAS appeared to utilize his cellular device to record photos and/or videos as seen in Images 5 and 6 at approximately 2:35 p.m. and 2:41 p.m. respectively.



Image 5

16. At approximately 2:38 p.m., LUCAS entered the Rotunda of the Capitol Building. LUCAS appeared to take several photos, and climbed on top of a statue of Ronald Reagan to pose. Images 6 -7.



Image 6



Image 7

17. At approximately 2:41 p.m., LUCAS walked through the Gallery Stairs from the 2nd floor to the 3rd floor of the Capitol Building. Image 8.

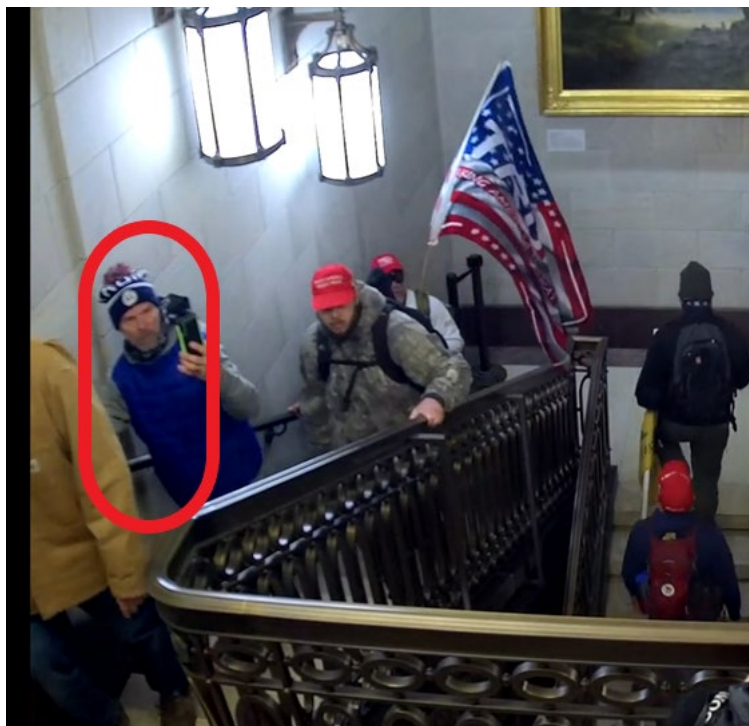


Image 8

18. At approximately 2:45 p.m., LUCAS walked through the Senate Gallery while holding his cell phone in the air as though filming or taking photos. Image 9.



Image 9

19. At approximately 2:48 p.m., LUCAS walked through the North stairwell outside the Senate Gallery while apparently using his cell phone. Image 10.



Image 10

20. At approximately 2:50 p.m., LUCAS exited the Capitol Building via the Senate Carriage Door on the North side of the Capitol building. Image 11 and Image 12.



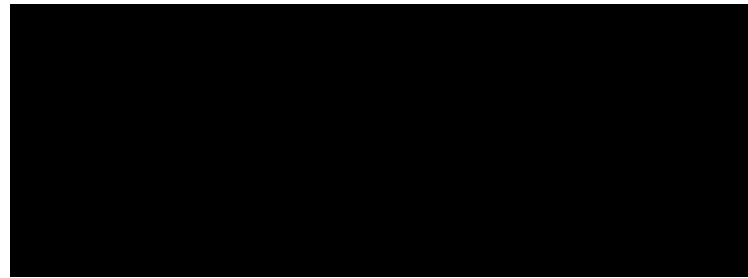
Image 11

Image 12

21. Based on my training and experience and the facts as set forth in this statement of facts, there is probable cause to believe that LARRY LUCAS violated Title 18, United States Code, Section 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; (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. 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.

22. Your affiant submits there is also probable cause to believe that LARRY LUCAS violated 40 U.S.C. § 5104(e)(2) (D) which makes it a crime to willfully and knowingly 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 40 U.S.C. § 5104(e)(2)(G) which makes it a crime to willfully and knowingly parade, demonstrate, or picket in any of the Capitol Buildings.



Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 2nd day of May 2024.

ZIA M. FARUQUI,

U.S. MAGISTRATE JUDGE