

UNITED STATES DISTRICT COURT

for the

United States of America

District of Columbia

v.

LEONARD PEARSO RIDGE

IV

[Redacted]

Case No.

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 06, 2021 in the county of Washington in the

District of Columbia, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|---------------------------------|------------------------------------|
| 18 U.S.C. § 1512(c) | obstructing an official proceeding |
| 18 U.S.C. §§ 1752(a)(1) and (2) | restricted building and grounds |
| 40 U.S.C. § 5104(e)(2) | disorderly conduct |

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

[Redacted Signature]

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, this 20th day of April, 2021



[Signature]

2021.04.20 16:55:44

-04'00'

Judge's signature

City and state: Washington, DC

U.S. Magistrate Judge Zia M. Faruqi

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

LEONARD PEARSO RIDGE IV

Date of Birth 11/01/2001

I, [REDACTED] being first duly sworn, depose and state as follows:

AFFIANT'S BACKGROUND

1. Your affiant, [REDACTED] is a Special Agent assigned to the Federal Bureau of Investigation (FBI) and have been so employed for approximately 23 years. 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.
2. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, my review of documentation and publicly available information, and my conversations with other law enforcement officers. Where the actions, statements, and conversations of others are recounted herein, they are recounted in substance and part, unless otherwise indicated. Where the affidavit contains items in quotation marks, those quotations are based on agent notes and may not be completely verbatim. Because this affidavit is being submitted for the limited purpose of supporting a criminal complaint, I am setting forth only those facts and circumstances necessary to establish probable cause for the issuance of the requested complaint. Unless otherwise indicated, all written and oral statements referred to herein are set forth in substance and in part, rather than verbatim.

PURPOSE OF AFFIDAVIT

3. This affidavit is in support of a criminal complaint charging LEONARD PEARSO RIDGE IV, aka Pearce Ridge, with violations of 18 U.S.C. § 1512(c) (obstructing an official proceeding); 18 U.S.C. §§ 1752(a)(1) and (2) (restricted building and grounds), and 40 U.S.C. § 5104(e)(2) (disorderly conduct).

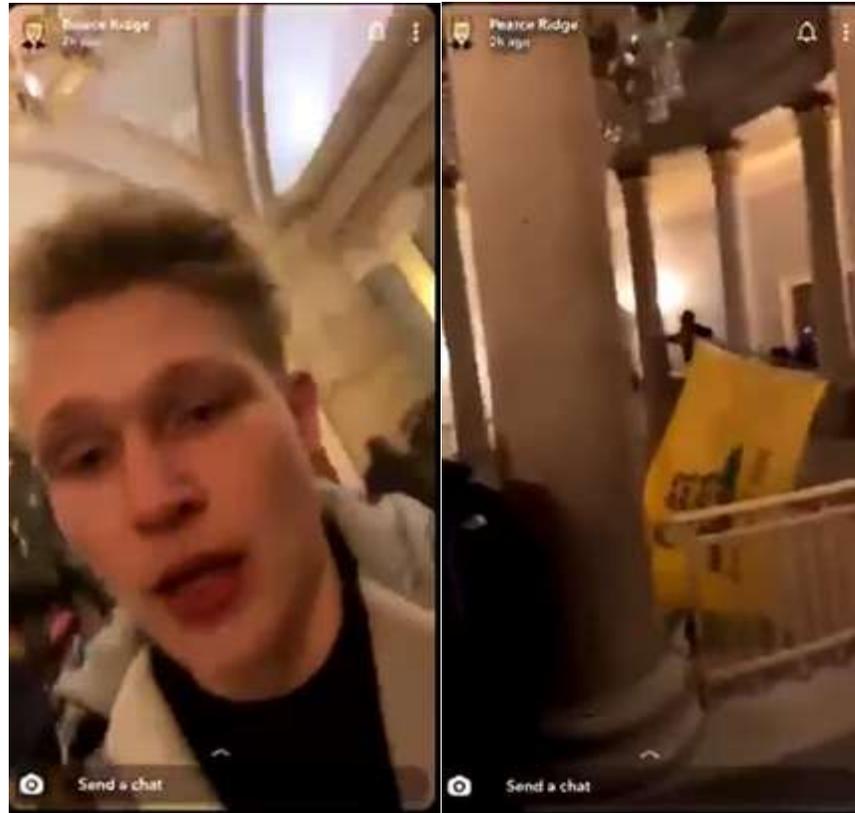
FACTUAL BASIS SUPPORTING PROBABLE CAUSE

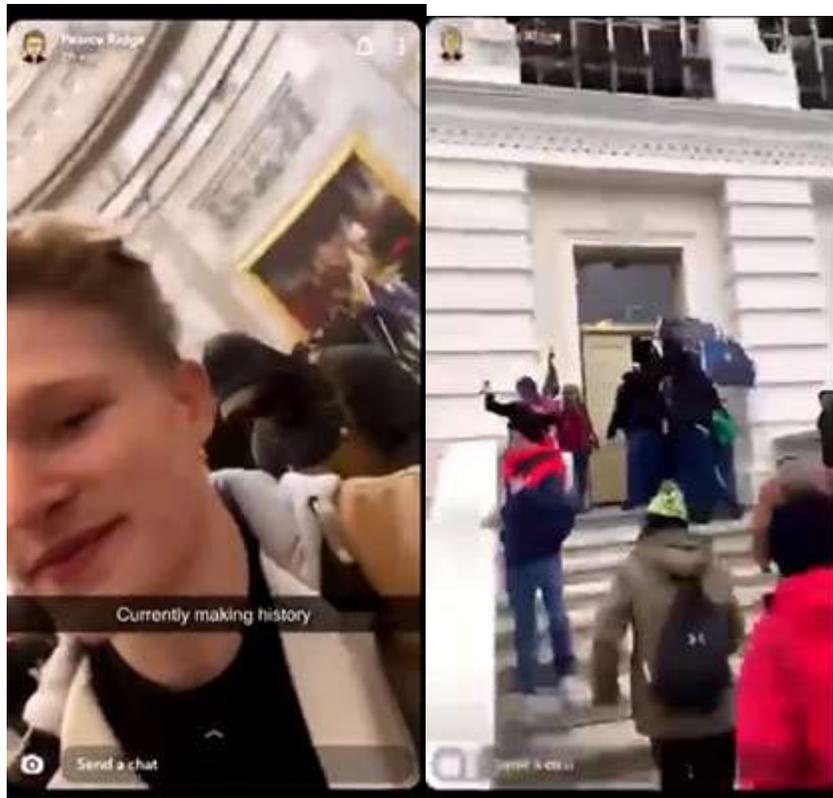
4. The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.
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 PM. Shortly thereafter, by approximately 1:30 PM, 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 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 around 2:00 PM, 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 PM, members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President 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 PM. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.
9. 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.
10. On or about January 9, 2021, the FBI received a tip from Confidential Witness (“CW1”). On January 21, 2021, the FBI conducted a voluntary interview of CW1. CW1 reported that CW1 had received a Snapchat video from a friend (“CW2”). CW2 had posted the video on an instant messaging group that both CW1 and CW2 were part of. The profile name on the Snapchat video stated, “PEARCE RIDGE.” CW1 provided a copy of the Snapchat video to the FBI.
11. The Snapchat video consists of several snapchats from the user with the profile name “Pearce Ridge.” The first snap contains a caption “TEAR GAS” and the image of a crowd in an area I recognize as being outside of the Capitol. The second snap contains images of a number of people walking up steps into the Capitol. A loud voice is heard in the video yelling words to the effect of “let’s go, let’s go. Get in this Bitch.” The third video captures several people walking up a stairway inside the Capitol. In the fourth video, which depicts the inside of the Capitol, one can hear the words to the effect of “they’re gassing it, they’re

gassing it” which I believe is a reference to tear gas being deployed within the Capitol building. The voice then loudly yells “America First Bitch.” The fifth video starts with a “selfie” style recording and shows a white male, with blonde hair, a camel colored jacket, and a black shirt inside the Capitol with the caption, “Currently making history.” The video then pans around the inside of the Capitol and a voice can be heard saying, “currently making history.” A voice can be heard saying words to the effect of, “doing alright boys? Just a little mace.” The video then flipped to a “selfie” style angle and the same white male, with blonde hair, a camel colored jacket, and a black shirt, can be seen inside the Capitol. Screenshots from some of these snapchat videos are depicted below





12. On or about January 21, 2021, Capitol Police confirmed a match of the male depicted in the Snapchat video with a male within the secure space in the Capitol rotunda during the riot. Images captured by Capitol Police CCTV depicting the same man inside the Capitol are provided below:





13. On January 25, 2021, a voluntary interview of CW2 was conducted by the FBI. When a mutual friend sent CW2 the Snapchat videos described above, CW2 recognized the white male with blonde hair, wearing the camel colored jacket depicted above as PEARCE RIDGE. CW2 personally knows PEARCE RIDGE from high school, which they attended together. CW2 also noticed that the name PEARCE RIDGE was located in the upper left-hand corner of the video. CW2 posted the Snapchat video of RIDGE to CW2's online group page, of which CW1 is a member. CW2 provided RIDGE's Snapchat username as PEARCE_RIDGEZ.

14. Database checks reveal that RIDGE resided around 4.5 miles from the high school he attended with CW2.
15. On January 30, 2021, a voluntary interview of a third witness (“CW3”) was conducted by the FBI after CW3 had contacted the FBI through the FBI tip line. CW3 stated that RIDGE had made posts on Snapchat indicating that he was present at the Capitol on January 6, 2021. CW3 provided RIDGE’s Snapchat username as PEARCE_RIDGEZ. CW3 described RIDGE as having “platinum hair.”
16. On March 9, 2021, another voluntary interview of CW2 was conducted by the FBI. During the interview, CW2 was shown four images taken from the Capitol Police CCTV. When asked if CW2 recognized anyone in the photographs, CW2 stated that the blond male wearing a tan jacket with a hood was the man CW2 knows as PEARCE RIDGE. CW2 stated that CW2 was “very sure” that the male they identified in the images was RIDGE. CW2 further stated that CW2 had previously seen RIDGE wearing the same tan, or camel, colored jacket and it was a jacket RIDGE frequently wore.
17. On February 8, 2021, a search warrant was served on Snap Inc., the owning company of Snapchat, for the contents of the Snapchat account bearing username PEARCE_RIDGEZ.
18. On March 23, 2021, Snap Inc. provided records related to the account bearing username PEARCE_RIDGEZ and I have reviewed those records, which include, in part, photographs, videos, and geodata.
19. The geodata provided by Snap Inc. in response to the search warrant consists of a spreadsheet titled Geo Locations. The spreadsheet includes date and timestamp information, paired with latitude and longitude data which can be plotted in a map. When I reviewed the data for January 6, 2021, the device accessing Snapchat on that date was doing so from points within the Washington D.C. area.
20. Additionally, I found videos within the Snapchat records which match those posted to the PEARCE_RIDGEZ account as viewed by others mentioned previously in this affidavit. I also reviewed additional videos taken both outside of the capitol building and from within the Capitol building.
21. Further, the following images were found within the Snapchat records dating from January 6, 2021 and January 7, 2021:



Donald J. Trump  @realDonaldTrump · 3h ...

I am the Senate. I am the living Constitution.
My Power belongs to ME. I'm not leaving!!!

 63.1K

 69.5K

 230K



The Telegraph
5h ago

'I'm thinking it will be literal war on that day'



2/2

How **extremist movements** used social media to seize the seat of American government

READ

The FBI is setting up a website to collect evidence & tips about the violent rioting at the US Capitol today. FBI urges anyone who witnessed unlawful violent actions to submit tips at fbi.gov/USCapitol. Agents looking for videos or photos to help identify federal crimes.

12:10 AM · 1/7/21 · Twitter for iPhone

1,878 Retweets 210 Quote Tweets 2,902 Likes



Donald J. Trump ✓
@realDonaldTrump



These are the things and events that happen when a sacred landslide election victory is so unceremoniously & viciously stripped away from great patriots who have been badly & unfairly treated for so long. Go home with love & in peace. Remember this day forever!

22. The records received from Snapchat also included Snapchat texts between the user “pearce_ridgez” and other snapchat users. Some excerpts follow:

On December 29, 2020, starting at approximately 16:24 UTC, the following exchange occurred:

pearce_ridgez: The election was completely stolen
USER1: And if they can steal it once they can steal it the next time too
Forever screwed if we don't stop it this time
pearce_ridgez: Yeah man something needs to change
And something big will happen in this nation very soon
Either in our favor or theirs and its just the final boiling point
whoever gets the upper hand will just control the country honestly
[sic].

A few lines later within the conversation:

pearce_ridgez: Yeah man, shit is gonna get really bad

On January 6, 2021 starting at approximately 20:17 UTC, the following exchange occurred:

USER1: Yoooo you legend
Bro someone just got shot in the neck there
Be careful bro you probably heard it but don't know if u saw it
pearce_ridgez: I saw it
Yeah fucking nuts
I just made history
USER1: You are good, right bro?
pearce_ridgez: I got tear gased [sic] and maced five times

On January 7, 2021, starting at approximately 00:22 UTC, the following exchange occurred:

pearce_ridgez: Yeah just stormed the US capital [sic] for the first time in US history
and I was a part of it
USER1: to see it fall apart in front [sic] of their eyes
Yeah hopefully that goes down in history and isn't erased with
everything they don't like tho
But atleast [sic] you know you attended
pearce_ridgez: Yeah man so epic I have a video of me fighting riot police in the
capital [sic] building

On January 7, 2021, starting at approximately 00:26 UTC, the following exchange occurred:

USER1: Bro you are my hero that is so sick I love you were there
You are the alpha male
pearce_ridgez: Yeah man I got tear gassed and maced [sic] five times ngl it was
rough

A few lines later within the conversation:

pearce_ridgez: Just pray for me that I don't get arrested by the fbi

On January 7, 2021, starting at approximately 16:15 UTC, the following exchange occurred:

pearce_ridgez: Yup I just walked into the capital [sic] to record and did not break
anything or steal anything
USER2: exactly to make a point

On January 7, 2021, starting at approximately 00:53 UTC, the following exchange occurred:

pearce_ridgez: We bro [sic] down McConnells door and nacy pelosios [sic] door and
raid the offices
USER3: Jesus Christ
Fair enough

It's understandable that you didn't have anything tho [sic] cause it wasn't like you expected this to happen
Unless you did lol

pearce_ridgez: Yeah no I didn't I just started recording shit when I went in there

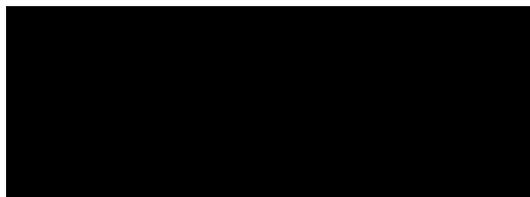
On January 10, 2021, starting at approximately 16:04 UTC, the following exchange occurred:

USER1: They are literally trying to wipe republicans from existence

pearce_ridgez: I hate to say it but like the time for us to fight is here

23. On 4/8/2021, I served a Grand Jury subpoena to Google LLC requesting subscriber information for account PEARCERIDGEZ19@GMAIL.COM. On the same date I received a response from Google LLC. Within the response, GoogleLLC provided the account username of PEARCE RIDGEZ with a phone number of the account holder as 267-xxx-xxxx. I recognize that telephone number as being associated with RIDGE in public database checks. The email account was created on December 12, 2014 and the user last logged into the account on March 12, 2021. An additional email associated with the account is an email account that, based upon my review of numerous records, I believe is associated with RIDGE's mother, who resides at the subject's address.
24. Based on the foregoing, your affiant submits that there is probable cause to believe that LEONARD PEARSO RIDGE IV 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.
25. Your affiant submits there is also probable cause to believe that LEONARD PEARSO RIDGE IV 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.
26. Your affiant submits that there is also probable cause to believe that LEONARD PEARSO RIDGE IV violated 18 U.S.C. § 1512(c), which makes it a crime to corruptly obstruct,

influence, or impeded (or attempt to do so) any official proceeding, including congressional proceedings.



FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone, this 20th day of April 2021.



A handwritten signature in blue ink, appearing to read "Zia M. Faruqui".

2021.04.20
16:55:18 -04'00'

ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE