

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

LAWRENCE LIGAS

DOB: XXXXXX

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)
)
)

Case: 1:21-mj-00669

Assigned To : Harvey, G. Michael

Assign. Date : 11/29/2021

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.

[Redacted signature]

Complainant's signature

[Redacted name] 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: 11/29/2021

[Signature]

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, [REDACTED], is a Special Agent of the Federal Bureau of Investigation. 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, detection, 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, 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.

On or about January 11, 2021, the Federal Bureau of Investigation National Threat Operations Center (“NTOC”) received a tip from an individual (CW-1) who stated that Lawrence Ligas (LIGAS) was quoted by name in a National Public Radio article entitled “Trump Supporters Storm U.S. Capitol, Clash with Police” that described individuals outside the United States Capitol on January 6, 2021. In that article, LIGAS is quoted as saying, “We’re not moving on... We are not Republicans. We are the MAGA party. We are patriots.” CW-1 identified LIGAS from an Illinois Driver’s License photograph but had not seen LIGAS in approximately 10 years.

According to records obtained through a search warrant which was served on Google, a mobile device associated with Gmail account [REDACTED] was present at and inside of the 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 ten 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 showed that a device associated with Gmail account [REDACTED] was inside the Capitol on January 6, 2021, between 2:41 PM (EST) and 3:34 PM (EST).

According to records provided by Google, the mobile device associated with Gmail account [REDACTED] (the “Google Account”) was registered in the name of “Lorenzo Ligas.” The Google account listed a recovery phone number of [REDACTED]. According to records provided by Verizon Wireless, the subscriber information associated with phone number [REDACTED] was “Lawrence Ligas.”

FBI Holdings records revealed that in and around March 2019 and April 2019, an individual identified as Lawrence Ligas, using phone number [REDACTED], called the NTOC to report voter fraud.

On or about January 5, 2021, a Youtube.com video titled “Lots of cops downtown Washington DC” was livestreamed by Youtube.com user “Political Trance Tribune” and shows an individual your affiant believes to be LIGAS in Washington, D.C. A screenshot of this individual, who is wearing an American flag-style scarf around his neck, is shown below as Exhibit 1.



WASHINGTON
Lots of cops downtown Washington DC
695 views • Streamed live on Jan 5, 2021

63 14 SHARE SAVE ...

Exhibit 1

Your affiant reviewed video footage from inside the Capitol on January 6, 2021. The footage shows an individual your affiant believes to be LIGAS wearing a red hat that reads “Make America Great Again,” a blue jacket, a light blue surgical mask, beige and black hiking-style shoes, and a blue scarf with white stars around his neck. The scarf is consistent with the scarf the individual was wearing in the Youtube.com video shown above in Exhibit 1. The video footage showed the individual entering the Capitol through the East Rotunda doors at approximately 2:40 PM (EST) (Exhibit 2), walking in the Rotunda (Exhibit 3), and finally exiting the Capitol through the East Rotunda doors at approximately 2:48 PM (EST) (Exhibits 4 and 5). The video footage also showed the individual holding what appears to be a cellular telephone while inside the Capitol. This individual is circled in red Exhibits 2 through 5 below.



Exhibit 2



Exhibit 3



Exhibit 4



Exhibit 5

Records obtained from Google for the Google account associated with email address [REDACTED] (the "Google Records") show that the account is subscribed to Lawrence Ligas with a user phone number of [REDACTED]. The Google Records contained numerous photographs timestamped January 5th and 6th of 2021, which depicted what your affiant believes to be the Capitol and surrounding areas, and Lawrence LIGAS.

The Google Records contained a photograph timestamped January 5, 2021 (Exhibit 6). This photograph showed an individual your affiant believes to be LIGAS wearing what your affiant believes to be the same American flag-style scarf that LIGAS wore inside the Capitol the

following day, January 6, 2021, as seen in Exhibits 5 and 6. Additionally, the individual in Exhibit 6 appears to be wearing the same beige and black hiking-style shoes that LIGAS wore inside the Capitol on January 6, 2021, as seen in Exhibit 3 above. The jacket and scarf worn by the individual in Exhibit 6 are consistent with the same worn by the individual in Exhibit 1.



Exhibit 6

Google Records also contained a photograph of an individual wearing a red hat that reads “Make America Great Again,” a blue jacket, and a blue scarf with white stars who is standing outside of the Capitol (Exhibit 7), and another photograph of the same individual standing in a room that your affiant has identified as the Rotunda inside the Capitol (Exhibit 8). Both photographs are time-stamped January 6, 2021. The red hat, blue jacket, and scarf are consistent with the same seen on the individual in Exhibits 4 through 6. The scarf is also consistent with same seen on the individual in Exhibit 1.



Exhibit 7

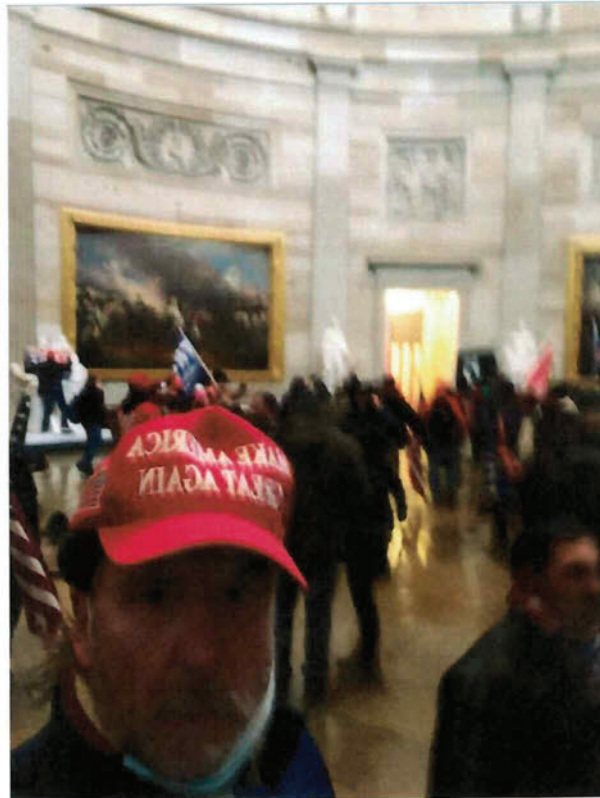


Exhibit 8

The Google Records also contained photographs timestamped January 6, 2021, which shows a large group of individuals standing outside the East Rotunda doors (Exhibits 9 and 10). These are the same doors through which the individual circled in red in Exhibit 2 can be seen entering the Capitol through in the video footage.



Exhibit 9



Exhibit 10


A Federal Bureau of Investigation Special Agent interviewed LIGAS as a witness concerning a separate matter on or about October 2017. The Special Agent viewed the photographs comprising Exhibits 6 through 8 and identified the individual in the photographs as Lawrence LIGAS. The Special Agent also reviewed the video footage from which the still photograph in Exhibit 5 comes from, and identified the individual circled in red as LIGAS.

According to records provided by Southwest Airlines, LIGAS flew on Southwest Airlines flight number 463 that departed the morning of January 5, 2021, from Chicago Midway International Airport (“MDW”) and arrived at Ronald Reagan National Airport (“DCA”), located in Arlington, Virginia the same morning. Records provided by Southwest Airlines also showed

that on the January 7, 2021, LIGAS flew on Southwest Airlines flight number 2969 that departed from DCA and arrived at St. Louis Lambert Airport (“STL”) that morning. Records provided by Southwest Airlines also showed that the same morning, LIGAS flew on Southwest Airlines flight number 1941 from STL to MDW.

Based on the foregoing, your affiant submits that there is probable cause to believe that Lawrence LIGAS 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. 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 LIGAS 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.


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 29th day of November 2021.



Digitally signed
by G. Michael
Harvey

G. MICHAEL HARVEY
U.S. MAGISTRATE JUDGE