

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.

Justin Daniel Perrou



) Case: 1:24-mj-00101
) Assigned To : Harvey, G. Michael
) Assign. Date : 3/19/2024
) 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

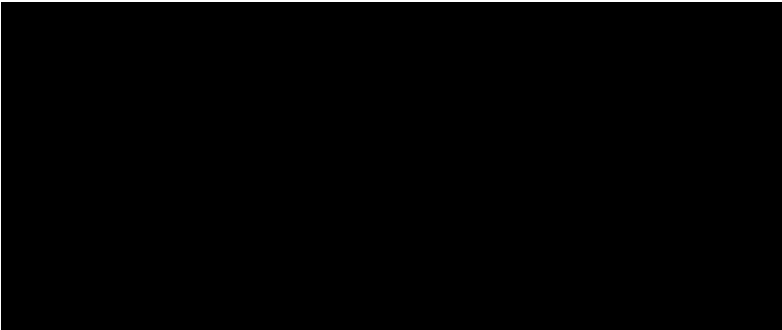
Offense Description

- 18 U.S.C. § 111(a)(1) and (b) - Assaulting, Resisting, or Impeding Certain Officers Using a Deadly or Dangerous Weapon,
18 U.S.C. § 231(a)(3) - Obstruction of Law Enforcement during Civil Disorder,
18 U.S.C. § 1752(a)(1) and (b)(1)(A) - Entering and Remaining in a Restricted Building or Grounds with a Deadly or Dangerous Weapon,
18 U.S.C. § 1752(a)(2) and (b)(1)(A) - Disorderly or Disruptive Conduct in a Restricted Building or Grounds with a Deadly or Dangerous Weapon,
18 U.S.C. § 1752(a)(4) and (b)(1)(A) - Engaging in Physical Violence in a Restricted Building or Grounds with a Deadly or Dangerous Weapon,
40 U.S.C. § 5104(e)(2)(D) - Disorderly or Disruptive Conduct in the Capitol Grounds or Buildings,
40 U.S.C. § 5104(e)(2)(F) - Act of Physical Violence in the Capitol Grounds or Buildings.

This criminal complaint is based on these facts:

See attached statement of facts.

Continued on the attached sheet.



Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone.

Date: 03/19/2024

Judge's signature

City and state: Washington, D.C.

G. Michael Harvey, U.S. Magistrate Judge

Printed name and title

Case: 1:24-mj-00101
Assigned To : Harvey, G. Michael
Assign. Date : 3/19/2024
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STATEMENT OF FACTS

Your affiant, [REDACTED], is a Special Agent with the Federal Bureau of Investigation. I have been a Special Agent since February 18, 2022 and have worked for the FBI since October 2021. Prior to working for the FBI, I was a United States Marine Corps Infantry Officer for four years. In my duties as a Special Agent, I have investigated national security matters of individuals and groups involved in both international and domestic terrorism. Currently, I am assigned to the South Carolina Joint Terrorism Task Force (JTTF). My duties on the JTTF include investigating criminal violations of federal laws of the United States. As an FBI Agent, I have participated in investigations of individuals who are motivated by extremist ideology and groups who commit or conspire to commit criminal acts, including acts of terrorism. I have conducted and participated in physical and electronic surveillance, executed search warrants, and debriefed informants. Additionally, I have received training, both formal and informal, in counter terrorism cases through the FBI's training academy in Quantico, Virginia. Through my investigations, training, and experience, I have become familiar with individuals motivated by extremist ideology who violate United States Federal law. 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 U.S. 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 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 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.

Identification Of PERROU

In or about June 2022, the FBI identified an unknown male (SUBJECT 1), later identified as Justin PERROU, who participated in the riot, wearing a grey hooded shirt, dark blue puffer jacket, black rimmed glasses, blue beanie, grey colored pants, light blue gloves, and, at times, a light-colored medical mask.



Images 1-2: Screenshots of open-source footage showing SUBJECT 1 on Capitol grounds on January 6, 2021

The FBI located SUBJECT 1 in archived open-source footage from the events at the Capitol and found numerous videos showing SUBJECT 1's conduct on January 6, 2021, including assaulting officers on the Lower Terrace of the U.S. Capitol on January 6, 2021. Video footage shows that, while rioters were attempting to overwhelm officers and breach the police line, SUBJECT 1 threw a pole at the police line, grabbed the face shield on a Metropolitan Police

Department Officer's helmet, and later sprayed numerous officers with what appeared to be a large canister of chemical irritant.

The FBI posted a photograph of SUBJECT 1 on the "Most Wanted – Capitol Violence Images" section of their website.



Image 3: Photograph of FBI "AFO #531" from January 6, 2021

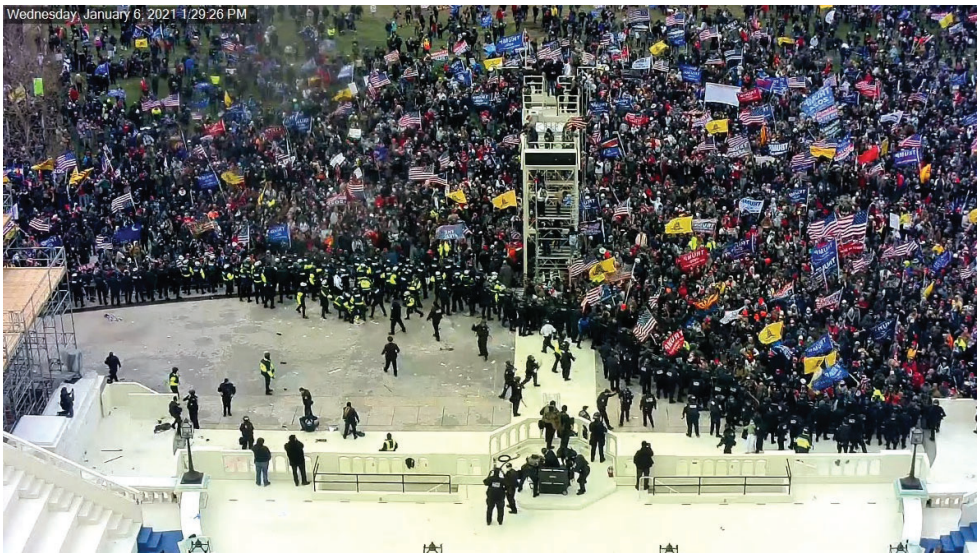
According to records obtained through a search warrant served on Ad Tech providers, a mobile device associated "Justin Perrou" was present at the U.S. Capitol on January 6, 2021. The FBI identified a "Justin Perrou" who lives in Charleston, South Carolina. The "Justin Perrou" with a known address in Charleston, South Carolina has a registered email address with a utility company showing an email address that was associated with a device known to be at the U.S. Capitol on January 6, 2021.

Your affiant also compared photos of SUBJECT 1 from January 6, 2021 to a South Carolina Driver's license image of "Justin Perrou," and concluded that they depict the same person.

Additionally, on or around April 2, 2023, a Charleston Police Department Master Police Officer made consensual contact with a male believed to be PERROU at PERROU's known address. This male appeared to have the same physical likeness of the person wearing a grey hooded shirt, blue jacket, black rimmed glasses, a blue beanie, dark colored pants, and light blue gloves in the video footage taken on January 6, 2021

PERROU's Participation In The Capitol Riot

On January 6, 2021, by around 1:00 p.m., a mob breached the U.S. Capitol grounds and flooded the West Plaza. At about 1:12 p.m., police officers from the Metropolitan Police Department arrived on the scene to assist the Capitol Police. Together, the officers formed another line of bike rack barricades and moved the crowd back.



Images 4-5: Screenshot of Capitol surveillance footage showing the West Front flooded with rioters (top) and about fifteen minutes later, the officers had established a bike rack line and moved the crowd back (bottom)

Rioters attacked the police officers using various weapons, aggressively pulled away the bike racks, and pushed into and threw objects at the police officers. As officers attempted to fend off the crowd, PERROU watched close by under the scaffolding with a black bullhorn in hand.



Images 6-7: Photograph, top, showing PERROU (yellow square) standing underneath the scaffolding watching rioters attack police officers and holding a black bullhorn, bottom

As emergency sirens blared in the area, rioters around PERROU destroyed an electric box, stole a metal bike rack from the police line, and threw objects at police officers. For his part, PERROU used the bullhorn to amplify obscenities that he yelled at police officers. Then, seconds later, PERROU threw his bullhorn in the direction of the police officers.



Images 8-9: Screenshots of video footage showing PERROU (yellow square) yelling into his bullhorn, top, and then throwing his bullhorn at the police line, bottom

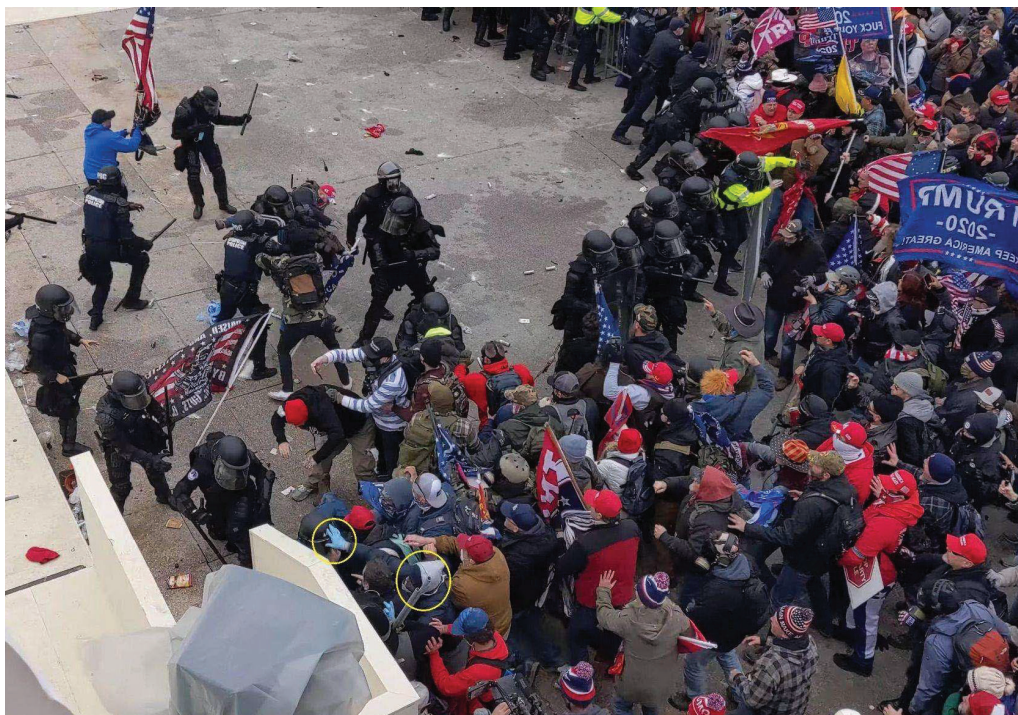
Around 2:26 p.m., smoke emitted in the air and rioters temporarily stepped back from the police line. Less than a minute later, PERROU stepped forward towards the front of the crowd and faced officers. Rioters re-approached the officers and started to forcefully pull the bike rack barriers away from the police officers, and a brawl broke out.

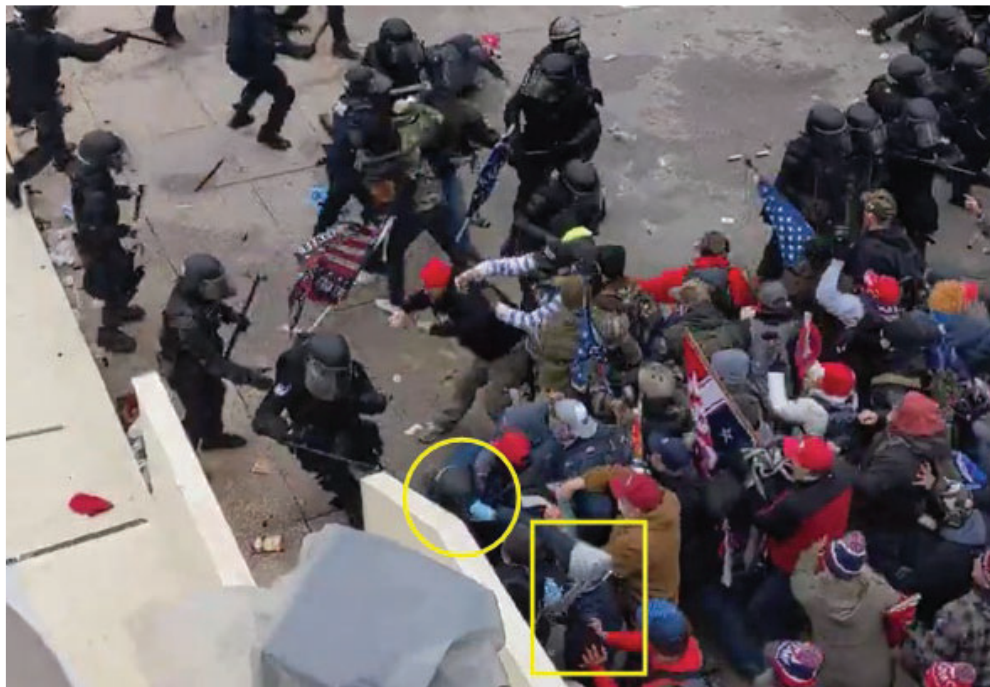
Rioters attacked police officers as the mob surged forward through the bike rack barriers. PERROU stood close by as he watched rioters attack police officers.



Image 10: Screenshot of video footage showing PERROU (yellow square) at the front of the mob as rioters attacked police officers

Still at the front of the crowd, PERROU pushed forward, reached his arm towards the face shield of a police officer's helmet, and forcefully grabbed the face shield and yanked down.

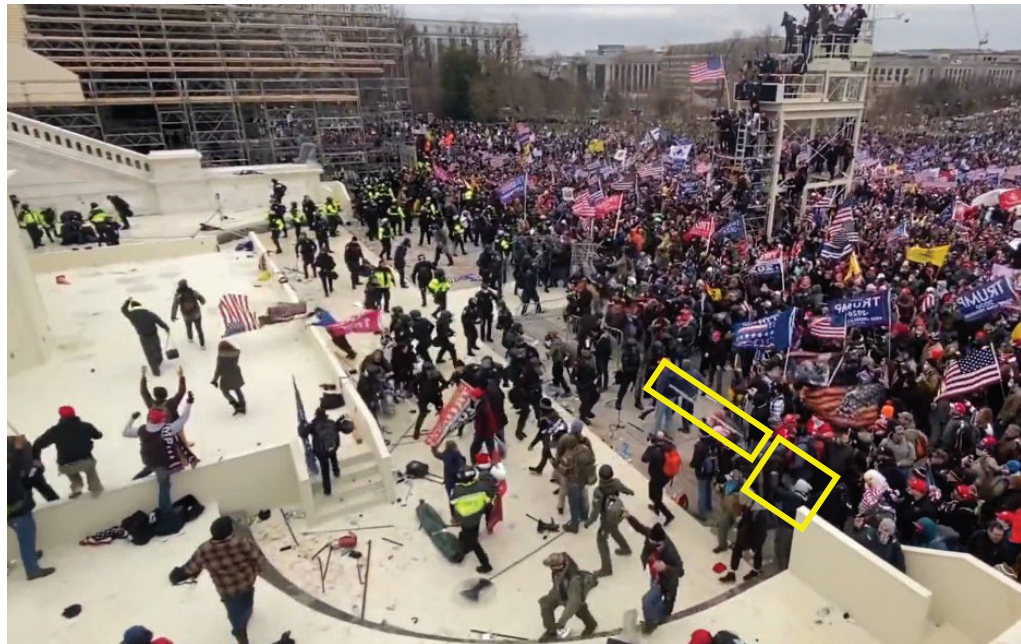


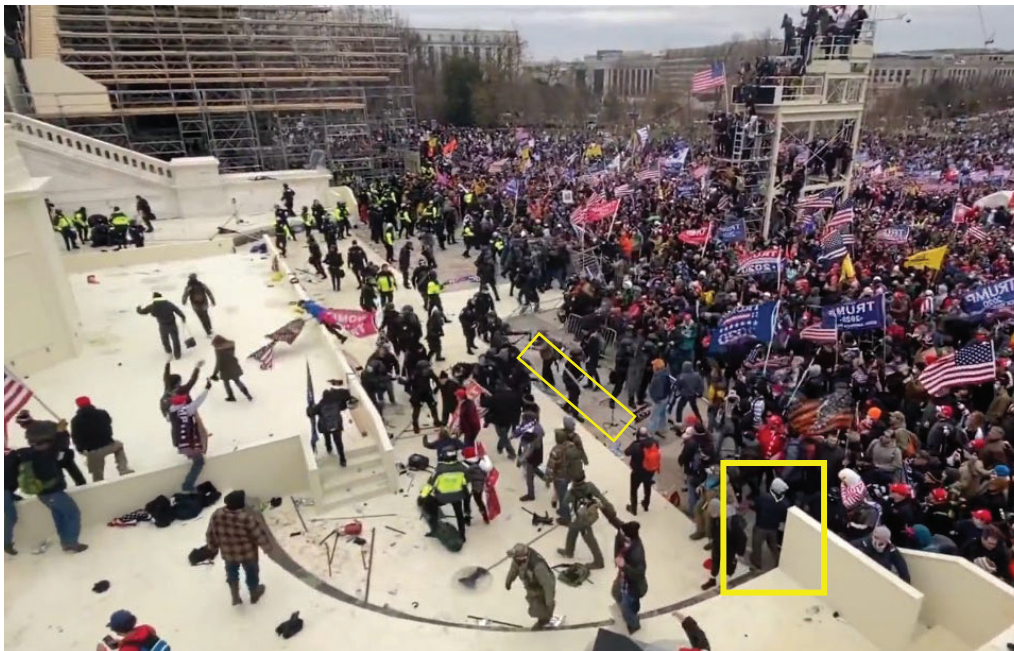


Images 11-12: Screenshots of video footage showing PERROU (yellow square) reaching his hand (yellow circle) and pulling on a police officer's face shield as the crowd surged through the officer line

After having been flanked and attacked for over an hour-and-a-half, the police line on the West Front of the Capitol broke and rioters – PERROU included – surged forward. By this time, PERROU had a long pole in his hand. As he stepped forward, PERROU threw the pole at the police officers.







Images 13-16: Screenshots of video footage showing PERROU (yellow square) throwing a long pole (yellow rectangle) towards police officers

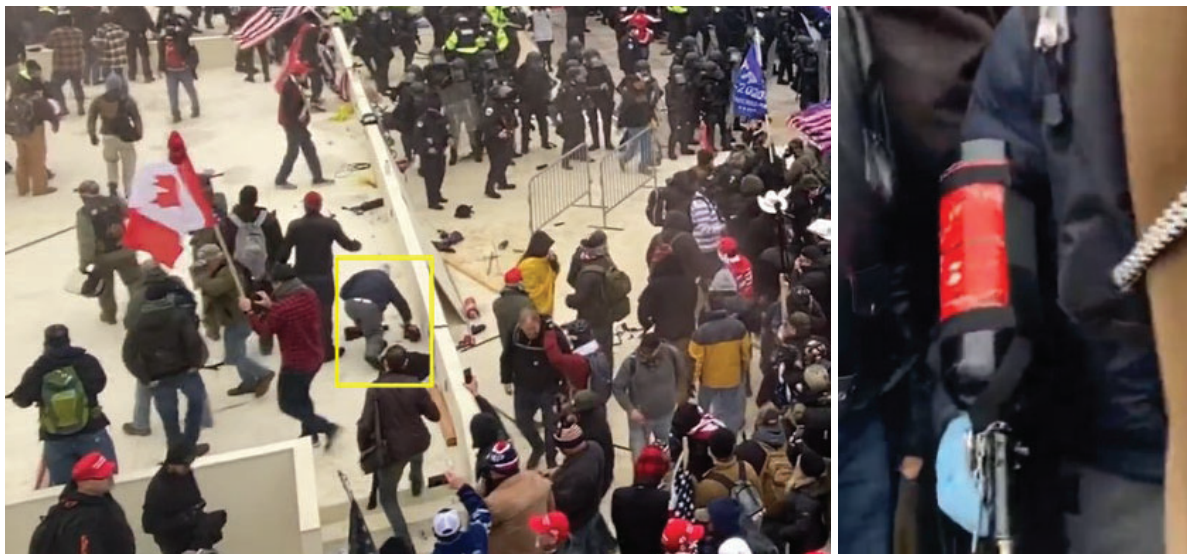
After throwing the pole at police officers, PERROU moved forward towards the police officers, now carrying what appears to be a folding chair. PERROU bent over and picked up a black bull horn, similar in nature to the one he earlier threw at police officers.





Images 17-18: Screenshots of video footage showing PERROU carrying a chair, top, and picking up a black bullhorn, bottom, on the West Plaza

After watching close by rioters as they aggressively attacked police officers, PERROU moved forward and picked up what appeared to be two law enforcement issued chemical irritant sprayers.



Images 19-20: Screenshots of video footage showing PERROU picking up chemical irritant sprayers, left, and up close screenshot showing the sprayer that PERROU used, right

PERROU handed one sprayer off to another rioter.



Image 21: Screenshot of video footage showing PERROU handing off one chemical irritant sprayer and keeping one for himself

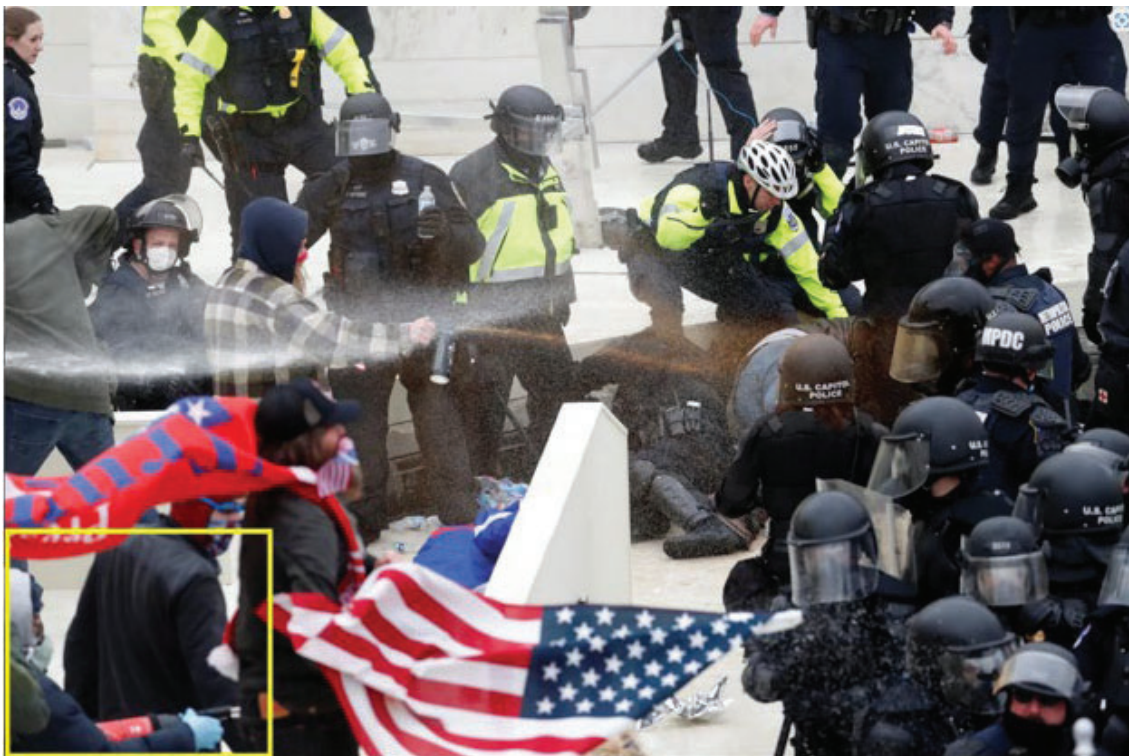
PERROU began spraying the chemical irritant directly at police officers.





Images 22-23: Screenshots of video footage showing PERROU (yellow square) spraying the chemical irritant canister at police officers

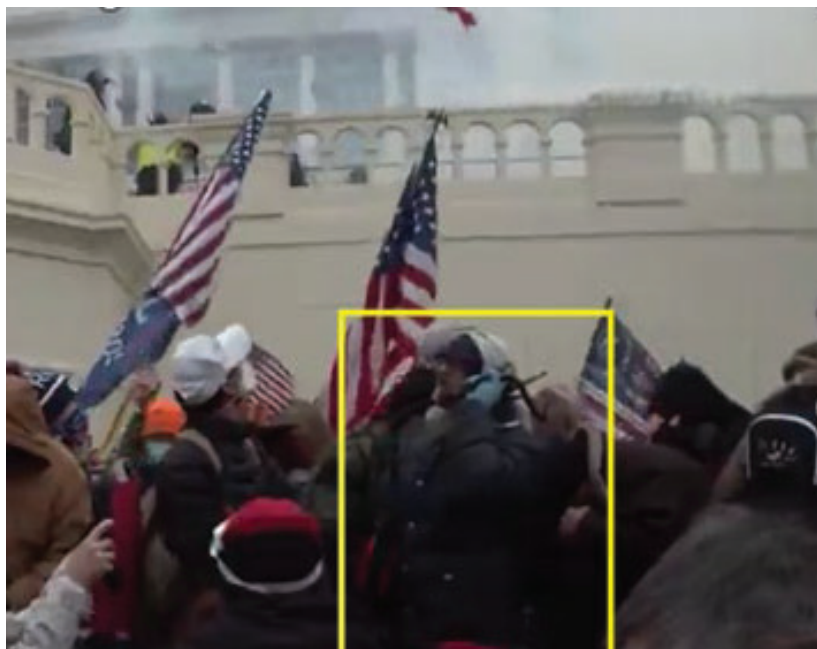
PERROU worked his way farther south and continued to spray chemical irritant at police officers who were being attacked from all sides.





Images 24-26: Screenshots of video footage showing PERROU (yellow square) spraying chemical irritant at police officers

As PERROU attacked officers on the West Plaza, he can be seen, at times, communicating on a handheld radio.



Images 27-28: Screenshots of video footage showing PERROU (yellow square) communicating on a handheld radio on the West Plaza as he held a sprayer

PERROU ascended to the Lower West Terrace, where he continued to carry the sprayer.

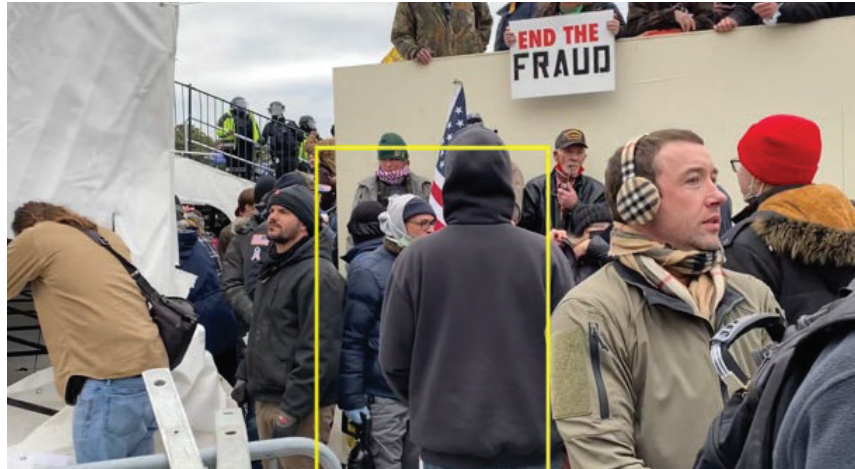


Image 29: Screenshots of video footage showing PERROU carrying the chemical irritant sprayer on the Lower West Terrace

For the reasons set forth above, I submit there is probable cause to believe that PERROU violated:

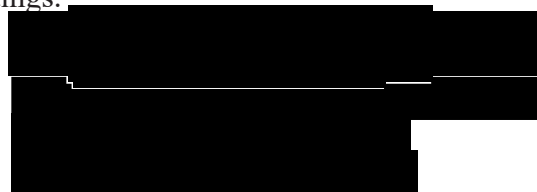
1. 18 U.S.C. § 111(a)(1) and (b), which makes it a crime to forcibly assault or interfere with any person designated in section 1114 of this title 18 while engaged in or on account of the performance of official duties and uses a deadly or dangerous weapon (including a weapon intended to cause death or danger but that fails to do so by reason of a defective component). Persons designated within section 1114 include any person assisting an officer or employee of the United States in the performance of their official duties.

2. 18 U.S.C. § 231(a)(3), which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of Section 231 of Title 18, a federally protected function means any function, operation, or action carried out, under the laws of the United States, by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Joint Session of Congress where the Senate and House count Electoral College votes. "Civil disorder" means any public disturbance involving acts of violence by assemblages of three or more persons, which causes an immediate danger of or results in damage or injury to the property or person of any other individual.

3. 18 U.S.C. § 1752(a)(1), (2), (4) and (b)(1)(A), which make 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; or attempts or conspires to do so; and (4) knowingly engage in any act of physical violence against any person or property in any restricted building or grounds, or attempt or conspire to do so. The punishment for violating these

provisions by using or carrying a dangerous weapon is imprisonment for up to 10 years. 18 U.S.C. § 1752(b)(1)(A). 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.

4. 40 U.S.C. § 5104(e)(2), which makes it a crime for an individual or group of individuals 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 (F) engage in an act of physical violence in the Grounds or 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 19th day of March 2024.

A handwritten signature in black ink, appearing to read "G. Michael Harvey".

HONORABLE G. MICHAEL HARVEY
U.S. MAGISTRATE JUDGE