

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

Ivan Todd

DOB: XXXXXX

) Case: 1:24-mj-00087
) Assigned To : Judge Robin M. Meriweather
) Assign. Date : 3/5/2024
) 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. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority,

18 U.S.C. § 1752(a)(2) - Knowingly, and with intent to impede or disrupt the orderly conduct of Government business ,

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: 03/05/2024

Judge's signature

City and state: Washington, D.C.

Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

STATEMENT OF FACTS

1. Your affiant, [REDACTED], is a Task Force Officer assigned to the Joint Terrorism Task Force ("JTTF") of the Jacksonville division of the Federal Bureau of Investigation ("FBI"). In my duties as a Task Force Officer, I have participated in criminal investigations relating to violent crime and counterterrorism, specifically domestic terrorism. Through my training and experience, I am familiar with the strategy, tactics, methods, ideology and practices of domestic terrorism and anti-government extremists. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a Task Force Officer, 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.
2. The facts in this statement 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 statement between facts of which I have personal knowledge and facts of which I have hearsay knowledge. This statement 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 IVAN TODD

9. According to records obtained through a search warrant served on Google, a mobile device associated with email address ivantodd096@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 email address ivantodd096@gmail.com was within proximity to the U.S. Capitol Rotunda Doors, along the East Front, on January 6, 2021, at 3:25:20pm EST. Google records show that the “maps display radius” for this location data was nine meters, or 30 feet, which encompasses an area that is in close proximity to the U.S. Capitol Building. Information obtained from Google indicated that Ivan Todd of Gainesville, Florida was the subscriber for the ivantodd096@gmail.com account on January 6, 2021.
10. I have reviewed open source images and video footage of an individual wearing a gray sweatshirt under blue overalls and a baseball hat inside the US Capitol Building on January 6, 2021. (Images 1 to 4).



Image 1



Image 2



Image 3



Image 4

11. Information obtained by the FBI on Ivan Todd DOB; XX/XX/1967, indicated prior employment at a company called Bilfinger. Investigators displayed a close up version of Image 1 to a former employee of Bilfinger who had worked with Todd (“Person 1”). Person 1 confirmed that the individual depicted in Image 1 was Ivan Todd.
12. Your affiant is also familiar with Todd’s appearance from reviewing his image from Florida Department of Motor Vehicles records. Based on that review, I believe that Todd is the individual depicted in Images 1-4.

FACTS SPECIFIC TO IVAN TODD

13. 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.

14. Todd can be seen entering the Parliamentarian Door on the Northwest side of the Capitol Building at 2:56 p.m. Image 5.

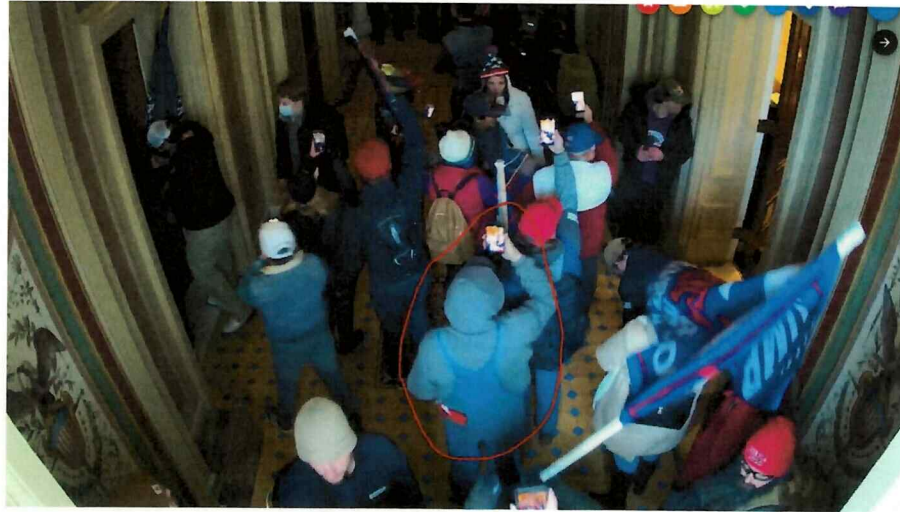


Image 5

15. After four minutes, Todd exited from the same door at approximately 3:00 p.m. Images 6-7.



Image 6



Image 7

16. Based on the foregoing, your affiant submits that there is probable cause to believe that Ivan Todd 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.
17. Your affiant submits there is also probable cause to believe that Todd 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.

[Redacted Signature]

Task Force Officer
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone, this 5th day of March 2024.

ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE