

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America)
v.)
Kenneth John Reda) Case No.
DOB [REDACTED])
)
)

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) - Disorderly or Disruptive Conduct in a Restricted Building or Grounds,

40 U.S.C. § 5104(e)(2)(D) - Disorderly or Disruptive Conduct on Capitol Grounds,

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.

N Continued on the attached sheet.

Page 1

Task Force Officer, FBI

Printed name and title

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

2021.07.01

Pat - Meow

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Judge's signature

Date: 07/01/2021

Robin M. Meriweather, U.S. Magistrate Judge
Printed name and title

STATEMENT OF FACTS

1. Your affiant, [REDACTED] is a Task Force Officer of the Federal Bureau of Investigation (“FBI”), assigned to the Joint Terrorism Task Force of the Brevard Resident Agency, Tampa Field Office. Currently, I am tasked with investigating criminal activity in and around the United States Capitol 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 violations of Federal criminal laws.

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. The FBI maintains a website through which members of the public may submit tips about suspected criminal activity, including crimes committed at the U.S. Capitol on January 6, 2021. Persons providing information may choose to provide identifying information or submit tips anonymously.

9. On or about January 18, 2021, an anonymous person ("TIPSTER 1") submitted a tip to the FBI. TIPSTER 1 stated:

Kenneth Reda lives in Brevard County Florida. This is his Parler account. I have heard that he was sending videos of the insurrection to friends. I am resubmitting because I heard he claimed to have ["]helped["] 3 police officers who had fallen or were being trampled.

TIPSTER 1 attached an image. Based on my experience and investigation, I recognize the image as showing a conversation between two users of Parler, which is a social networking platform operated by Parler, LLC. In the screenshot, a person with the username "mrjoe Bidenhead" admits to entering the U.S. Capitol:



Figure 1: Redacted version of screenshot from Parler provided by TIPSTER 1, showing comment made by mrjoe Bidenhead.

10. On or about January 19, 2021, an anonymous person (“TIPSTER 2”) submitted a tip to the FBI. TIPSTER 2 stated:

This was found on Pro-publica[’]s website of capitol videos. This is Kenneth Reda who lives in or around cocoa beach FL. The last is an old photo of him and shows the arms of his glasses.

TIPSTER 2 attached a close-up photo of the person TIPSTER 2 identified as REDA:



Figure 2: Redacted version of photo of REDA provided by TIPSTER 2.

11. According to records obtained through a search warrant served on Google, a mobile device associated with an email address containing REDA’s first and last name @gmail.com (the “REDA Gmail”) was present at the U.S. Capitol on January 6, 2021.¹ 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 the REDA Gmail was within the U.S. Capitol or the restricted grounds from approximately 2:36 p.m. to approximately 3:35 p.m., or about 59 minutes. Google records show that the “maps display radius” for this location data was less than 100 feet, which encompasses an area that is partially within the U.S. Capitol Building.

¹ Unless otherwise specified, the full email addresses and phone numbers referenced in this Statement of Facts are known to the FBI but are omitted due to the public nature of this filing.

12. Records obtained from Google show that the REDA Gmail is registered to Ken Reda. It is linked to a recovery email address containing REDA's initials and last name @yahoo.com and a phone number ending in -4563.

13. Records obtained from Oath Holdings Inc. (which operates Yahoo Mail) show that the @yahoo.com email address referenced above is registered to Ken Reda and another person whose last name is Reda, and was created on April 10, 1998. This @yahoo.com email address is linked to an address in California, a phone number ending in -4850, and the REDA Gmail (which was in the proximity of the Capitol, as described in paragraph 11). In addition, records obtained from Oath Holdings Inc. show that another Yahoo Mail email address, this one containing Reda's first and last name, is registered to Ken Reda and was created on December 1, 2017. This additional Yahoo Mail email address is linked to the phone number ending in -4563 but not to any physical addresses or alternate email addresses.

14. According to records obtained through a search warrant served on Verizon Wireless, on January 6, 2021, in and around the time of the incident, the cell phone associated with the phone number ending in -4563 was identified as having utilized a cell site consistent with providing service to a geographic area that includes the interior of the U.S. Capitol Building. Records obtained from Verizon Communications show that the -4563 account is serviced by a different provider. Thus, these records do not contain REDA's name or other identifying information.

15. Using a Florida government database, I located an address associated with REDA. On or about May 14, 2021, I went to REDA's neighborhood in Melbourne, Florida. I spoke with an adult who lived nearby ("NEIGHBOR") and identified myself as a law enforcement officer. I showed REDA's driver's license photo to NEIGHBOR, and NEIGHBOR confirmed that REDA lived at the address I had identified. NEIGHBOR did not know REDA's name but said that REDA drove a Jeep with large tires and was a teacher.

16. Following my interview of NEIGHBOR, I searched online for REDA and found a publicly available Facebook post of an article and video uploaded on or about December 18, 2019, by Space Coast Daily, which appears to be an online media outlet. The post identified REDA as a coach for the Viera Hawks football team. Based on my investigation and my knowledge of the area, I know that Viera High School is located in Viera, Florida, and that its mascot is a hawk. I watched the video on the Facebook posting, including a portion in which REDA is identified by name. Below is a screenshot showing the video in which REDA appears along with the accompanying post:

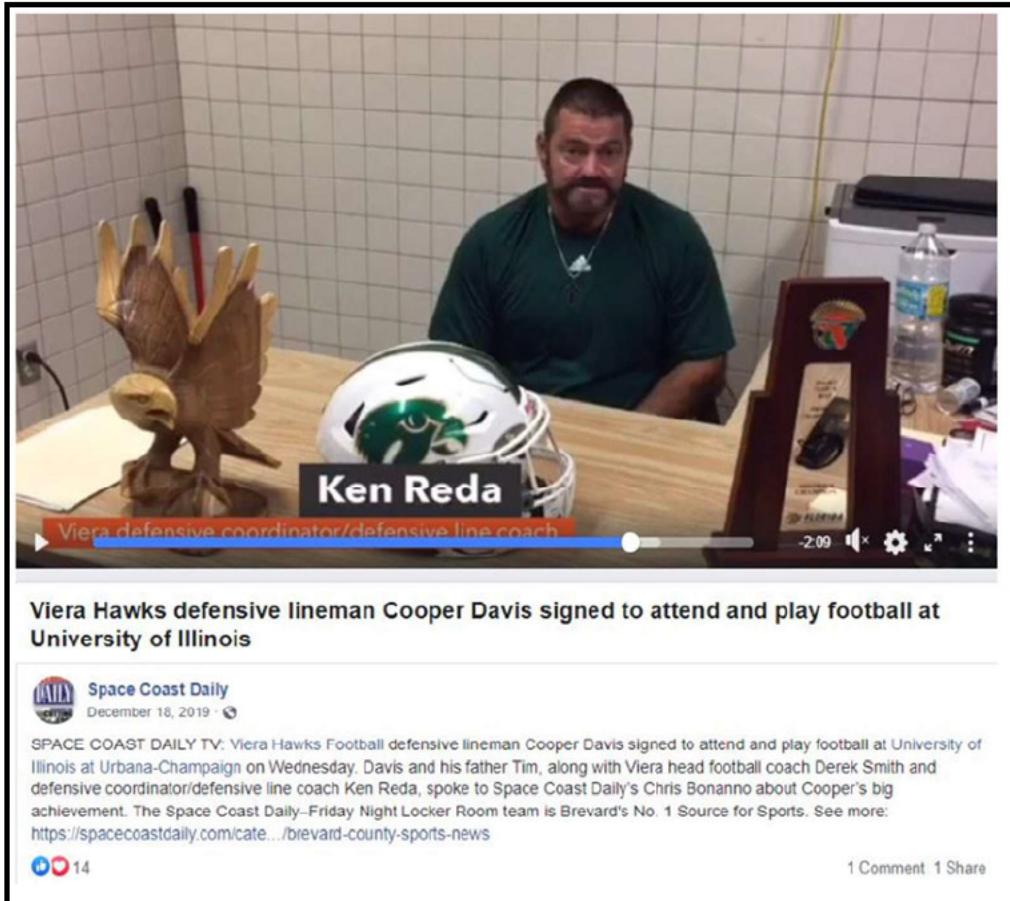


FIGURE 3: Screenshot of post and video from Space Coast Daily's Facebook page showing REDA.

17. After watching this video, I obtained the license plate number for REDA's vehicle. I went to the Viera High School parking lot, where I located a Jeep with large tires, as described by NEIGHBOR. The Jeep's license plate number matched the one registered to REDA. On a later day, I returned to Viera High School and observed REDA arrive in the Jeep and walk into the school. I recognized REDA from his driver's license photo, the Space Coast Daily post, and the photo provided by TIPSTER 2.

18. I have reviewed video footage captured on January 6, 2021, by U.S. Capitol surveillance cameras. Based on my observations of REDA at the high school, the photo provided by TIPSTER 2, the video posted by Space Coast Daily, and the location records provided by Google, I was able to identify REDA in these videos. I watched surveillance footage showing REDA entering the U.S. Capitol at approximately 3:02 p.m.; walking through the U.S. Capitol, including the Rotunda; and exiting the U.S. Capitol at approximately 3:12 p.m. REDA appeared to be with two other individuals. Below are several screenshots taken from U.S. Capitol surveillance video showing REDA inside the U.S. Capitol on January 6, 2021 (REDA is identified with red boxes):

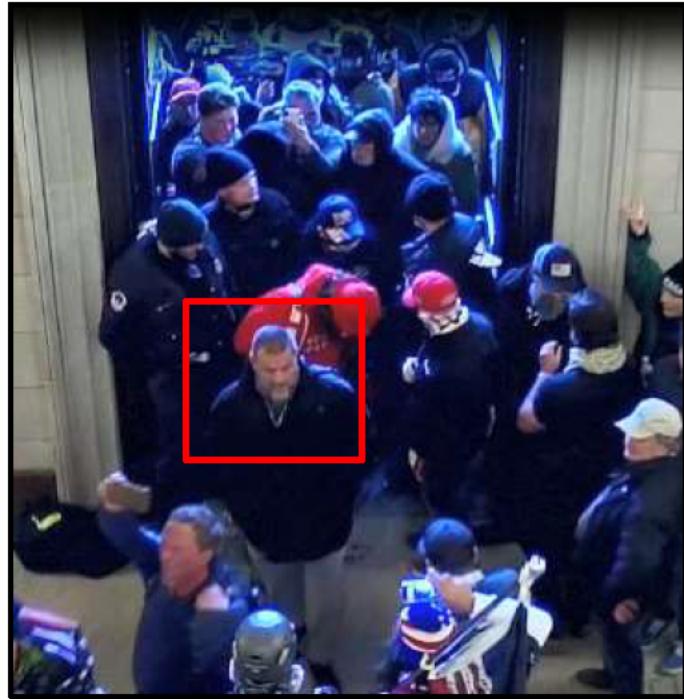


FIGURE 4: Screenshot of Capitol surveillance video showing REDA entering U.S. Capitol at 3:02:47 p.m.

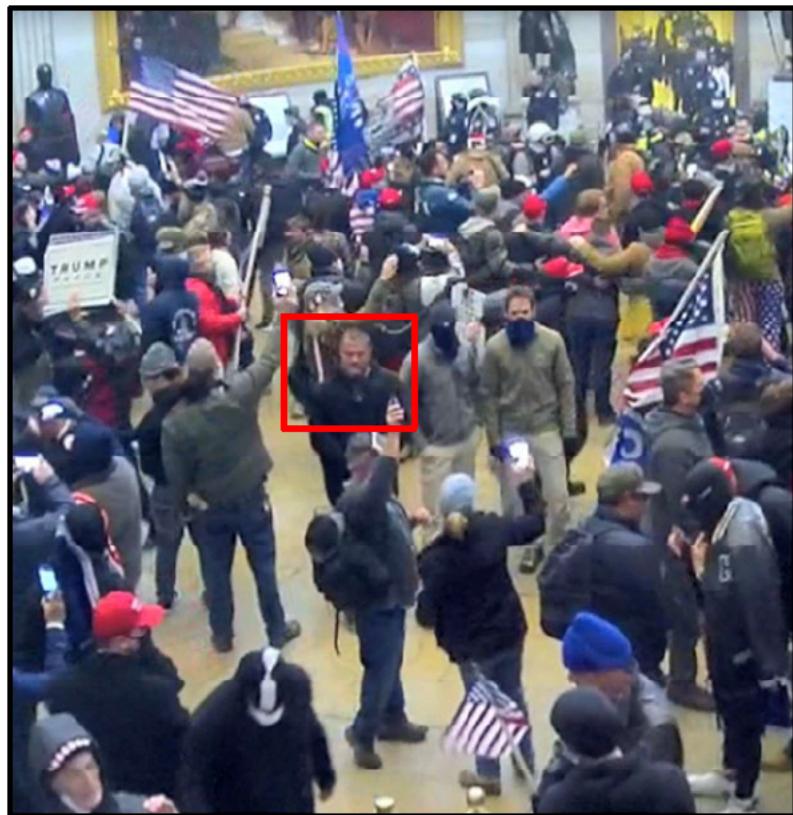


FIGURE 5: Screenshot of Capitol surveillance video showing REDA in U.S. Capitol Rotunda at 3:04:09 p.m.

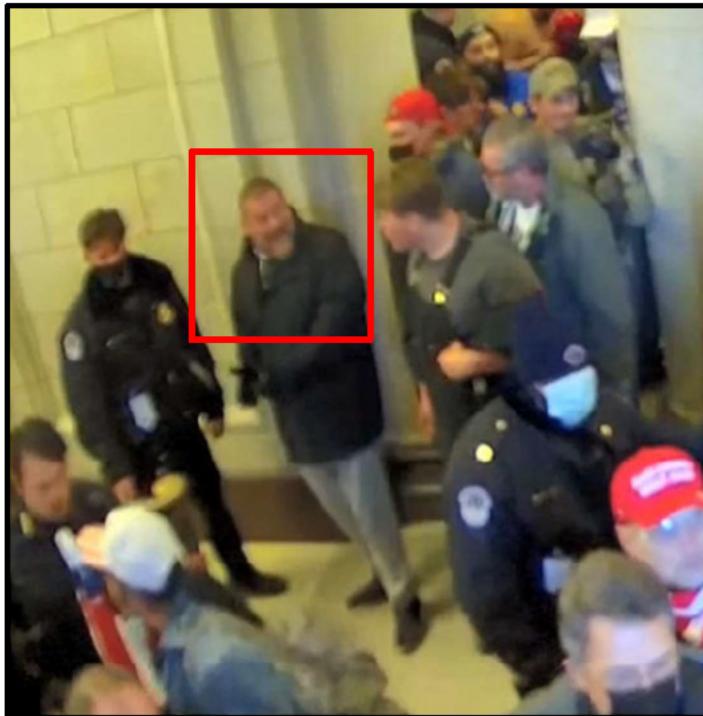


FIGURE 6: Screenshot of Capitol surveillance video showing REDA near exit of U.S. Capitol at 3:11:47 p.m.

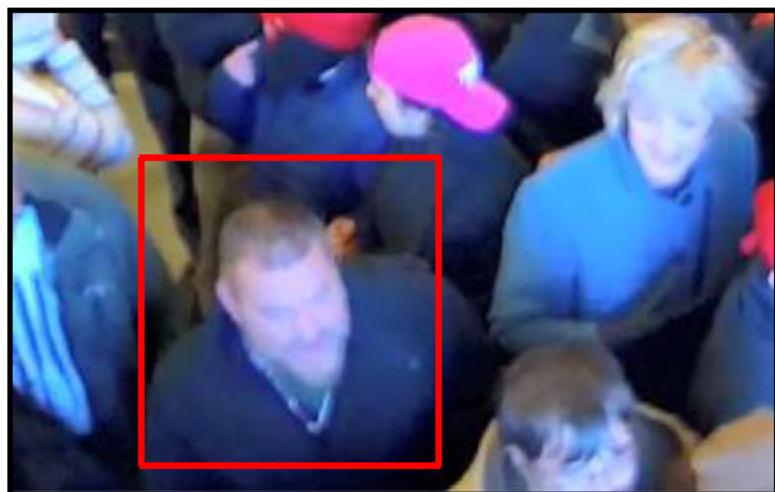


FIGURE 7: Screenshot of Capitol surveillance video showing REDA exiting U.S. Capitol at 3:12:28 p.m.

19. Parler, LLC provided records that show that the “mrjoebidenhead” account is linked to the REDA Gmail. These records show that the account was created on or about June 17, 2019. It is not linked to a phone number. The user’s self-described biography is: “Imperfect Son of the Lord Jesus Christ, Husband, Father, Son, Pop, Educator, concerned American NRA & 2A supporter: WWG1WGA.” Based on my investigation and experience, I believe that REDA is the owner of the mrjoebidenhead Parler account, given the biography and its connection to the REDA Gmail that contains his name.

20. Records obtained from Parler, LLC confirm TIPSTER 1's tip that REDA posted a comment admitting to being inside the U.S. Capitol. On or about January 6, 2021, REDA posted the following comment:

I was there at the steps of the Capital I got into the capital building there was certainly a difference in attitude by some a small number mind you than the rest of us more violent and speaking poorly to the police but I am sure the #'s were small but served to be agitators the majority wanted to get into the Capital to let the Executive branch to hear our voices and instead the built fencesand barriers and asked the police to forcibly keep us out. They did thier duty but were overwhelmed by numbers.

Also on January 6, 2021, REDA posted a comment stating: "Violence and vandalism was very minor minus the cop shooting a young girl." Using the records from Parler, LLC and a website available to the public, I determined that the Internet Protocol ("IP") address associated with these two posts was located in Baltimore, Maryland.

21. Other Parler posts by REDA demonstrate his intent to travel to Washington, D.C., on January 6, 2021, and his knowledge that Congress was meeting that day to certify the vote of the Electoral College. For example:

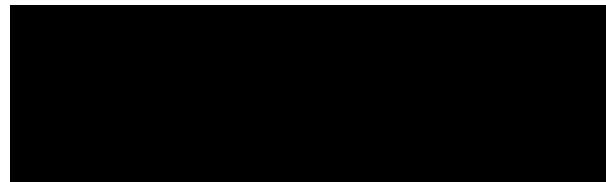
- On or about December 19, 2020, REDA posted: "We have got to get to DC on January 6th it is IMPERATIVE every single person that VOTED for Trump has to flood DC. . . ."
- On or about December 22, 2020, REDA posted: "#patriots #WWG1WGA All it is IMPERATIVE that we let our elected federal officials know in both the Senate and the house that we will not be voting for them again if they do not support our President Trump on January 6th when they are cou thing Electoral College votes this is the cleanest Constitutionally right way for Trump to win a 2nd term. WE MUST LET THEM KNOW THE THING THAT THE COVET THE MOST THIER PPWER WILL BE GONE IF THEY DO NOT SUPPORT TRUMP. . . ."
- On or about December 27, 2020, REDA made a post containing the phrase: "See you in DC on the 6th assholes who don't support trump."
- On or about December 27, 2020, REDA posted: "It is time to organize PATRIOTS we need to get together and organize against this KABAL we need to overthrow it....they have thrown their last ditch effort to overthrow this election therefore this nation if we do not come together and organize we will LOSE."
- On or about December 30, 2020, REDA posted: "Read echo understand and join us in DC on the 6th."

22. Based on my investigation, I have determined that REDA was not authorized to be inside the U.S. Capitol or within the restricted building or grounds on January 6, 2021.

23. Based on the foregoing, your affiant submits that there is probable cause to believe that REDA violated 18 U.S.C. § 1752(a)(1) and (2), which make 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.

24. Your affiant submits there is also probable cause to believe that REDA violated 40 U.S.C. § 5104(e)(2)(D) and (G), which make 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.



Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 1st day of July, 2021.

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HON. ROBIN M. MERIWEATHER
UNITED STATES MAGISTRATE JUDGE