

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
Glenn Allen Brooks
DOB: XXXXXX
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 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) and (2) - Entering and Remaining and Disorderly and Disruptive Conduct
in a Restricted Building or Grounds,
40 U.S.C. § 5104(e)(2)(D) and (G) - Disorderly Conduct and 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 area]

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: 07/27/2021

[Signature] 2021.07.27
19:29:37 -04'00'
Judge's signature

City and state: Washington, D.C.

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

## STATEMENT OF FACTS

Your affiant [REDACTED] is a Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”), and have been so employed for approximately six years. Currently, your affiant is tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a federal agent, your affiant is authorized to investigate violations of laws of the United States, and as a law enforcement officer, I am authorized to execute warrants issued under the authority of the United States.

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

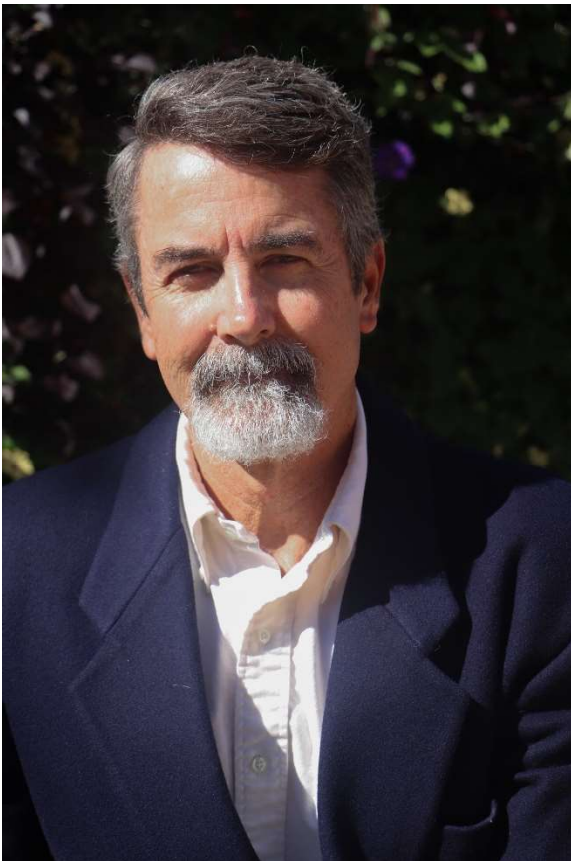
violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

Following the events at the U.S. Capitol, the FBI received an electronic tip concerning Glenn Brooks's ("BROOKS") potential involvement in breaching the Capitol.

**Witness #1:** On or about January 30, 2021, the FBI received an electronic tip from Witness #1, who stated that a member of his/her church prayer text group, Glenn BROOKS, boasted of his active participation in the January 6, 2021, events at the U.S. Capitol in Washington, D.C. Witness #1 also stated that BROOKS sent photos of his attendance at the Capitol to the church text group that included other people at the riots/protest and a selfie photo of himself inside the Capitol.

On February 9, 2021, the FBI conducted a follow-up interview with Witness #1, who confirmed that he/she previously completed an online complaint identifying Glenn BROOKS as an individual who was inside the U.S. Capitol on January 6, 2021. Witness #1 provided BROOKS' address, phone number, and email address that was later corroborated by FBI.

Witness #1 stated that approximately two years earlier, BROOKS had grown a white beard. Witness #1 sent a photograph to the FBI of BROOKS with a white beard (below left) and stated that the person in the selfie photograph inside the U.S. Capitol (below right) is BROOKS.



On March 24, 2021, at approximately 10:13 a.m., your affiant conducted surveillance on BROOKS' residence, located in Huntington Beach, CA. At approximately 10:13 a.m.,

BROOKS arrived at the residence, driving a burgundy 2004 Ford F150, California license plate number 7K58134. The words “Brooks Works [REDACTED]-1053 Kitchen & Bath Remodel, Custom Cabinet, CAD Design & CNC Build” was imprinted on the window of the vehicle.<sup>1</sup> BROOKS was photographed as he exited the vehicle and he still had the distinct white beard consistent with the two above-mentioned photographs.



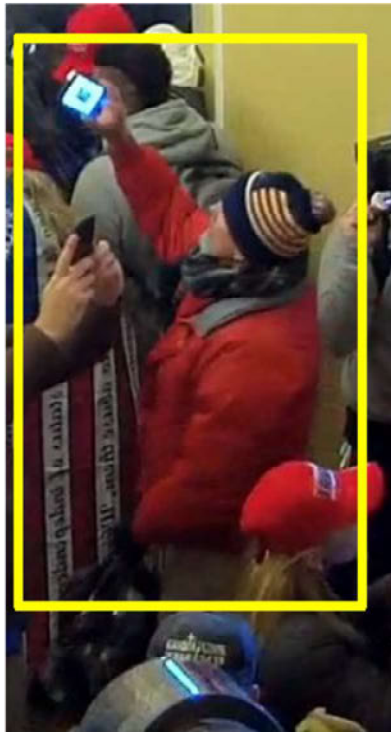
**U.S. Capitol Building video-surveillance/CCTV:** Law enforcement subsequently obtained video-surveillance camera footage of the Capitol’s interior that recorded BROOKS enter the Capitol building on January 6, 2021. At approximately 3:13 p.m., BROOKS entered the Senate side of the U.S. Capitol by climbing through a broken window near the Senate Wing Door. As seen in the photographs below, BROOKS has a distinctive white beard and was wearing a red jacket, a plaid scarf, and a red/white/blue knit hat with the word “TRUMP” on the front.



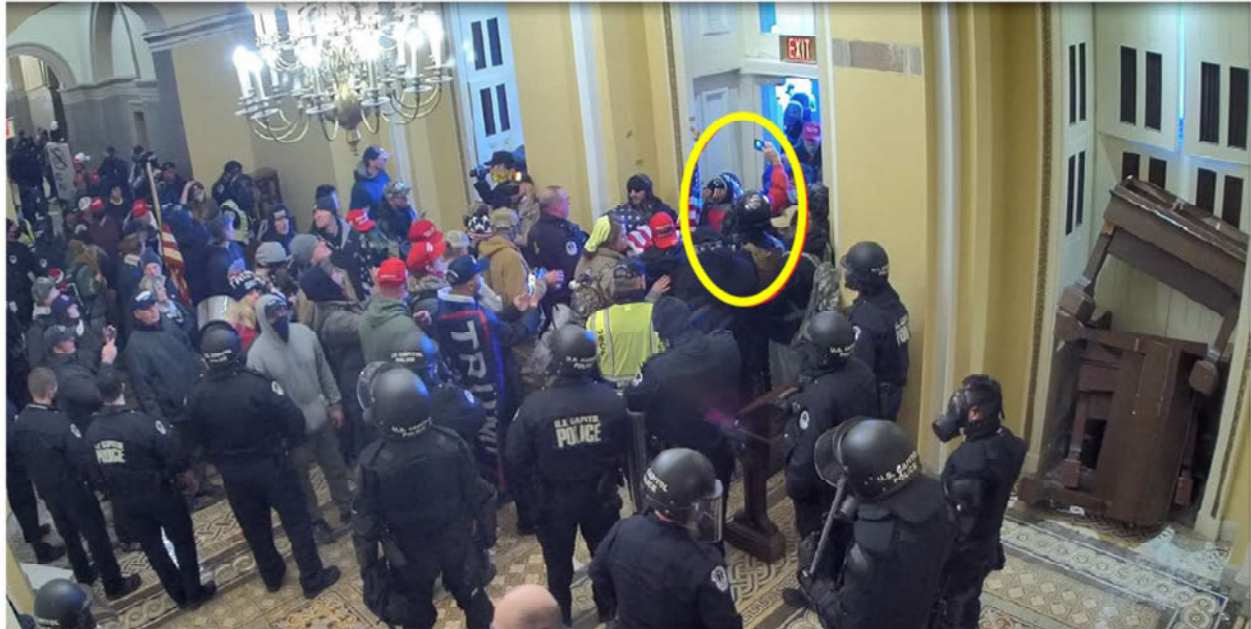
<sup>1</sup> The full phone number that was displayed on the vehicle has been redacted from this public filing.



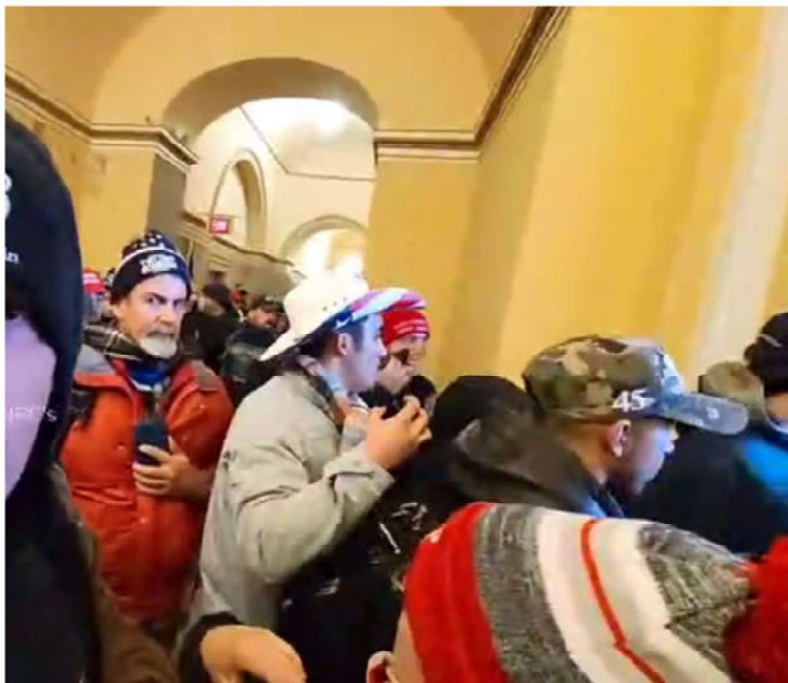
Once inside the U.S. Capitol, BROOKS was recorded holding a cellphone while he took photographs inside the Capitol building.



At approximately 3:30 p.m., BROOKS exited the Capitol Building while holding his cellphone and recording the scene.



**Open Source video:** Law enforcement subsequently obtained open source video entitled “TRUMP RALLY DC DLIVE – w – Qvht-Gg 2TRUMP RALLY DC · DLive - w-QvhT-Gg 2.” At approximately the 47-second mark into the video, BROOKS was recorded looking directly at the camera, wearing the same red jacket, plaid scarf, and blue/white knit hat and distinctive beard as seen in the photograph of BROOKS as he entered the Capitol building via the broken window.



**Identification:** I have obtained a copy of Glenn BROOKS' California driver's license photograph and the more current photograph of BROOKS with a beard that was provided to the FBI by Witness #1. I have also personally observed BROOKS at his residence. I have reviewed the selfie photograph sent by BROOKS to his church text group that captured BROOKS inside the Capitol building. I have compared the selfie image of BROOKS inside the Capitol building with the photographs provided by Witness #1 of BROOKS and they appear visually to be the same person.

In addition, I compared the most current photograph of BROOKS provided by Witness #1 to the screenshot images from the Capitol interior video-surveillance footage, and they appear visually to be the same person. Finally, the surveillance video of BROOKS entering the Capitol clearly shows BROOKS' clothing and physical attributes, including his white beard, and they appear to match the person in the selfie photograph that BROOKS sent to his church text group of himself inside the Capitol (including a distinct scarf, red jacket, and hat).



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

Your affiant submits there is also probable cause to believe that Glenn BROOKS violated 40 U.S.C. § 5104(e)(2), 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 27th day of July, 2021.



2021.07.27  
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ROBIN M. MERIWEATHER  
UNITED STATES MAGISTRATE JUDGE