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7 *Representing the United States of America*

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
 11 Plaintiff
 12 vs.
 13 REGINALD LEWIS,
 14 Defendant.

Case No. 2:20-mj-821-BNW

COMPLAINT FOR VIOLATION OF:

Count One:
 Depredation Against Property of the United
 States – 18 U.S.C. §§ 1361 and 2

15 BEFORE the Honorable Brenda Weksler, United States Magistrate Judge, Las Vegas,
 16 Nevada, the undersigned Complainant, being duly sworn, deposes and states:

17 Count One

18 (Depredation Against Property of the United States)

19 On or about May 30, 2020, in the state and Federal District of Nevada,

20 REGINALD LEWIS,

21 defendant herein, willfully and by means of repeatedly kicking the windows of a building, did
 22 injure and commit a depredation against property of the United States and of any department
 23 or agency thereof, and property which had been manufactured and constructed for the United

1 States, and any department or agency thereof, specifically the Foley Federal Building, located
2 at 300 South Las Vegas Boulevard, Las Vegas, Nevada 89101, and the resulting damage was
3 over one thousand dollars (\$1000.00) all in violation of Title 18, United States Code, Sections
4 1361 and 2.

5 PROBABLE CAUSE AFFIDAVIT

6 1. Your Complainant is a Special Agent with the Federal Bureau of Investigation
7 (FBI), has been so employed since January 10, 2019, and is currently assigned to the Las Vegas
8 Field Office. Prior to this, he was a police officer for 10 years with the North Las Vegas Police
9 Department and Western Illinois University Police Department. As an FBI Agent,
10 your Complainant is assigned to the FBI's Las Vegas Violent Crimes Task Force and is
11 responsible for investigating a variety of violent crimes, to include bank robbery, kidnapping,
12 extortion, robbery, carjackings, assaults and murders of federal officers, racketeering related
13 violent offenses, as well as long-term investigations into the activities and operations of career
14 criminals, criminal enterprises, drug trafficking organizations, and violent street
15 gangs. Your Complainant has experience in conducting criminal investigations, including the
16 investigation of criminal groups and conspiracies as well as the collection of evidence and the
17 identification and use of witnesses.

18 2. The following information contained within this criminal complaint is based on
19 your Complainant's participation in this investigation or was provided to him by other law
20 enforcement personnel. I have not included every fact known to be concerning this offense. I
21 have set forth only the facts I believe are essential to establish the necessary foundation for this
22 Complaint. All times noted are approximate.

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FACTS ESTABLISHING PROBABLE CAUSE

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2 3. On May 30, 2020, in Las Vegas, Nevada, large crowds gathered in multiple
3 locations of the Downtown area. A crowd arrived at the Lloyd D George Courthouse, located
4 at 333 South Las Vegas Boulevard, Las Vegas, Nevada and the Foley Federal Building (FFB),
5 located at 300 South Las Vegas Boulevard, Las Vegas at approximately 10:15p.m. Participants
6 in the protest became more boisterous, fireworks were set off, the walls near the buildings were
7 spray painted with obscenities and anti-law enforcement graffiti, and several small bushes of the
8 landscaping were lit on fire. Multiple individuals went to the east entrance of the FFB and
9 began to throw paint on the windows and caused physical damage to the building. Individuals
10 kicked the windows and doors to damage or break them to make entry, spray painted windows,
11 and attempted to break windows with a hammer, metal bars, and the metal letters torn off from
12 the sign that read, "FOLEY FEDERAL BUILDING UNITED STATES COURTHOUSE."

13 4. An on-duty Federal Protective Service (FPS) Protection Security Officer (PSO)
14 T.W., who was stationed inside the FFB, witnessed the damage and attempted break-in at the
15 building. T.W. stated the crowd outside could see him inside the building and said, "Get him!"
16 "Get the cop!" T.W. was in fear of the crowd breaking through the windows and door and was
17 in fear of the potential actions of the individuals against his person if they successfully made
18 entry. Ultimately, additional police units arrived inside the building and the crowd was
19 dispersed. Some letters torn from the FFB were taken by individuals and not recovered. The
20 Lloyd D. George Federal Courthouse was also damaged during this time.

21 5. On May 30, 2020, the FFB property located at 300 South Las Vegas Boulevard,
22 Las Vegas, Nevada, 89101, was property of the United States and of any department or agency
23 thereof and property which had been manufactured and constructed for the United States, and
any department or agency thereof.

1 6. On June 3, 2020, the General Services (GSA) completed a damage estimate for
2 the repair and clean-up of the FFB property. The estimate totaled seventy one thousand three
3 hundred thirty five dollars and seventy-two cents (\$71,335.72).

4 7. The FFB was equipped with surveillance cameras on the exterior of the building
5 which captured footage of individuals who damaged the building on May 30, 2020. One
6 individual who was captured on the surveillance footage damaging the FFB was later positively
7 identified by investigators as REGINALD LEWIS (hereinafter referred to as "LEWIS").
8 LEWIS, a black male adult, wearing a black mask, a red "durag," sunglasses, plain white t-
9 shirt, red athletic pants with a thick white stripe down each side, black sandals and a black
10 shoulder bag, was observed in the FFB video footage and other social media videos damaging
11 or attempting to damage the building by kicking the windows of the building. When LEWIS
12 was kicking the building, his mask was not on his face, but was below his chin.

13 8. On FFB security Camera 19 at approximately 22:20:28, 22:20:32 and 22:20:36,
14 LEWIS was seen kicking the windows on the north end of the east entrance patio. LEWIS
15 kicked the windows a total of six (6) times. LEWIS was accompanied by a black female adult,
16 identified as JEANETTE WALLACE (hereinafter referred to as "WALLACE"). WALLACE
17 had long braided blonde-highlighted hair and was wearing an orange jacket with blue jeans.
18 WALLACE similarly participated in damaging the FFB by kicking the doors and windows.
19 LEWIS appeared to follow WALLACE around and record the damage being done on his
20 cellphone.

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Image #1 – 05/30/2020 - Foley Federal Building Security Camera 9, LEWIS and WALLACE at FFB east patio windows.



Image #2 – 05/30/2020 - Foley Federal Building Security Camera 9, LEWIS recording WALLACE and damage at FFB east patio windows.

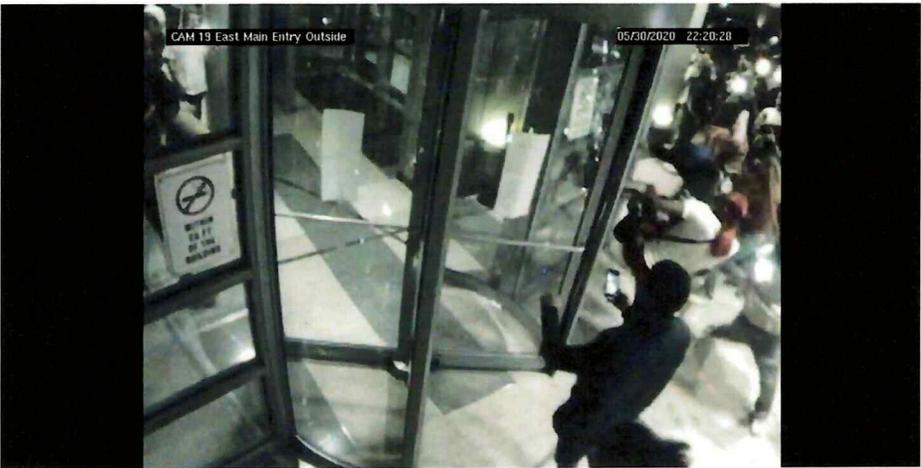


Image #3 – 05/30/2020 - Foley Federal Building Security Camera 19, LEWIS kicking FFB windows.

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Image #4 – 05/30/2020 - Foley Federal Building Security Camera 19, LEWIS kicking FFB windows.

9. LEWIS and WALLACE were also observed in a social media video on YouTube of a live stream posted by user name “Abandoned Explained” titled “LIVE: George Floyd Protest in Downtown Las Vegas,” which recorded protests in the Downtown Las Vegas area and the damage at the FFB on May 30, 2020. At the 2:00:43, 2:00:47, and 2:00:51 marks, LEWIS was observed kicking the windows of the FFB. At the 2:01:10 mark of the same video, LEWIS appeared to be using his phone to record the damage to the building—specifically, WALLACE throwing items at the FFB.

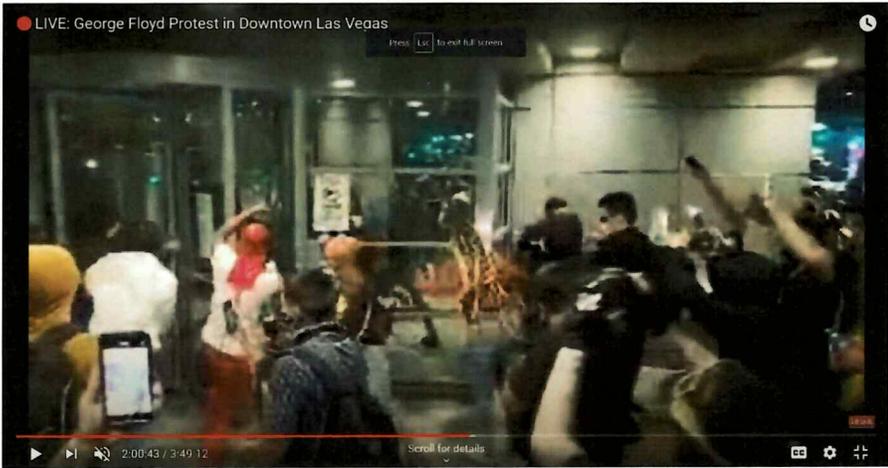


Image #5 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS kicking FFB.

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Image #6 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS kicking FFB.

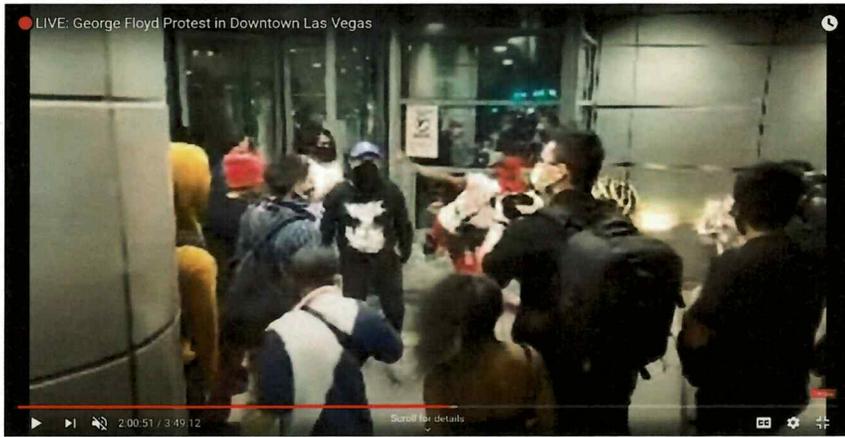


Image #7 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS kicking FFB.

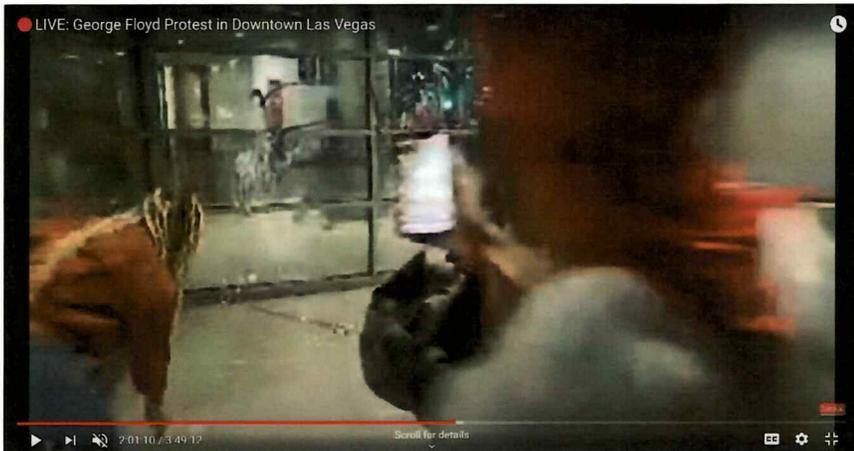


Image #8 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS appears to be recording damage with cellphone.

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Image #9 – 05/30/2020 - from “Abandoned Explained” Video, LEWIS in red durag, white shirt, and red pants holding cellphone.

10. Agents interviewed WALLACE on August 3, 2020. WALLACE admitted to damaging the FFB on May 30, 2020 and was shown still photos (Images #2 and #8) from the surveillance and YouTube videos. WALLACE identified the black male wearing the red durag, white shirt, and red pants as her friend “Ray,” or REGINALD LEWIS.

11. Your Complainant conducted database checks of LEWIS, to include Nevada Department of Motor Vehicle checks. These checks showed LEWIS had the same likeness and body build as the individual who caused damage to the FFB.

12. After searching Facebook for the name “REGINALD LEWIS,” your Affiant discovered LEWIS had a Facebook profile under the name “Rae Toon,” <https://www.facebook.com/raee.toon>. The individual in the profile photo and other photos on LEWIS’ Facebook appeared to be the same individual as seen in the surveillance footage. The individual in the Facebook photos also bore the same likeness as LEWIS’ driver’s license image. The profile showed that LEWIS was also Facebook friends with WALLACE.

13. On his Facebook profile, LEWIS posted live videos from the protests in Las Vegas on May 30, 2020, including of himself and WALLACE damaging the FFB. In the videos, LEWIS is wearing the same clothes he was seen wearing in the FFB and YouTube

1 surveillance footage. Additionally, LEWIS had several photos on his Facebook account on
2 different dates wearing a red “durag” similar to the one he wore the night he damaged the FFB
3 building.



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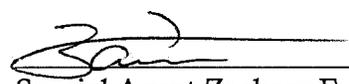
Image #10 – 09/09/2020 – from Facebook page “Rae Toon,” still photo of LEWIS from live video LEWIS posted during the May 30, 2020 protests at the FFB.

14. On September 8, 2020, agents conducted surveillance at LEWIS’ known residence and saw LEWIS leaving the residence. Agents confirmed that LEWIS appears to be the individual in the FFB surveillance footage and in the live videos from the Facebook page “Rae Toon” damaging the FFB along with WALLACE on May 30, 2020.

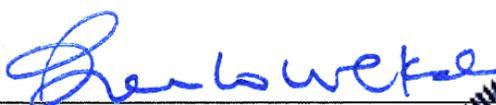
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CONCLUSION

15. Based on the foregoing facts and information, Your Complainant believes there is probable cause to believe that REGINALD LEWIS did commit a violation of 18 U.S.C. §§ 1361 and 2 – Depredation Against property of the United States.


Special Agent Zachary Franklin
Federal Bureau of Investigation

Attested to by the Applicant in accordance with the requirements of Fed. R. Crim. P. 41 by telephone on this 15th day of September, 2020.


THE HONORABLE BRENDA WAKSLER
UNITED STATES MAGISTRATE JUDGE

