

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
Lance Michael Ligocki
DOB: XXXXXX

) Case: 1:24-mj-00092
) Assigned To : Judge Robin M. Meriweather
) Assign. Date : 3/6/2024
) 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

Title 18, U.S.C. § 111(a)(1) - Assaulting, Resisting, or Impeding Certain Officers,
18 U.S.C. § 231(a)(3) - Obstruction of Law Enforcement During Civil Disorder,
18 U.S.C. § 1752(a)(1), (a)(2), and (a)(4)- Entering and Remaining; Disorderly and Disruptive
Conduct; and, Engaging in Physical Violence in a Restricted Building or Grounds,
40 U.S.C. § 5104(e)(2)(D), and (e)(2)(F), Disorderly Conduct and Acts 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: 03/06/2024

s/Robin M. Meriweather

2024.03.06
18:01:26 -05'00'

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 assigned to the Champaign, Illinois Resident Agency of the Springfield, Illinois FBI Field Office. I have been a Special Agent with the FBI for over 15 years. During my career as a Special Agent, I have investigated a variety of federal violations relating to child exploitation, violent crime, drug trafficking, public corruption, civils rights, fraud, and terrorism. 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 violations of federal criminal laws. The information contained in this statement of facts is based in part on my own investigation, information provided by other law enforcement officers, information provided by other witnesses, and my experience and background as a law enforcement officer. The information contained in this statement of facts is not an exhaustive account of everything I know about this case. Rather, it is only the facts I believe are necessary to establish probable cause to issue the requested warrant.

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. In addition, 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. Eastern Standard Time (“EST”). Shortly thereafter, by approximately 1:30 p.m. EST, 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 establishing a restricted area, 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. EST, 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. EST, 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. EST. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

As a result of the siege of the Capitol, the Mayor of the District of Columbia issued a Declaration of a Second Public Emergency – Citywide Curfew which imposed a curfew commencing at 6:00 p.m. EST on January 6, 2021 and ending at 6:00 a.m. EST on Thursday, January 7, 2021. This adversely impacted interstate commerce¹. For instance, Safeway Supermarket in Washington, D.C. closed at 4:00 p.m. EST as a result of the curfew, negatively impacting sales².

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.

On January 15, 2021, the FBI received an anonymous public tip stating that LANCE LIGOCKI admitted to attending the “Stop the Steal” rally in Washington, D.C. on January 6, 2021, and that he had pictures of the event on his phone that he had been showing to friends. The tipster did not know whether or not LIGOCKI had entered the U.S. Capitol Building.

Later, in late November 2021, the FBI Washington Field Office (WFO) received information from a confidential source (referred to herein as “CS”) indicating that a previously unidentified individual of interest given the open-source moniker #FullFlagSuit, who was observed on the U.S. Capitol grounds on January 6, 2021 wearing a distinctive U.S. flag jacket and hat, was LANCE LIGOCKI of Oakwood, Illinois. Based on photographic and video evidence described further below, this individual was carrying a “Trump” flag and “Stop the Steal” sign on January 6, 2021 while on the Capitol grounds.

CS based its identification of LIGOCKI as the individual given the moniker #FullFlagSuit on a comparison between images it obtained from open-source research, described further below, to the following publicly available cover photo posted on LIGOCKI’s Facebook account (Figure 1).

¹ <https://mayor.dc.gov/release/mayor-bowser-orders-citywide-curfew-beginning-6pm-today>

² <https://www.washingtoninformer.com/safeway-closes-d-c-locations-amid-protests/>



Figure 1

Through my investigation I am aware of a video which was posted on Instagram account @jrobertson.nyc (<https://www.instagram.com/p/CJxPQcXgq6H/>) depicting events at the U.S. Capitol on January 6, 2021. At the approximately 2 minute and 37 second mark of the video, when it appeared that numerous individuals were attempting to breach the U.S. Capitol Building, the individual identified as LIGOCKI by CS was observed approaching the Lower West Terrace entryway of the Capitol building and swinging a pole with a “Trump” flag at law enforcement officers three times while carrying a “Stop the Steal” sign. Figures 2, 3, 4, and 5 below are still images of the individual identified by CS as LIGOCKI as he pushes his way up through the crowd and swings a flag pole repeatedly at officers guarding the entrance at the Lower West Terrace to the Capitol building.



Figure 2



Figure 3



Figure 4



Figure 5

A separate video posted on the internet shows the same actions from another view, with a still image depicted in Figure 6. Figure 6 appears at approximately the 1 minute and 23 second mark of the video (<https://www.youtube.com/watch?v=2IxGAsQ3M-w>).



Figure 6

In both of the above videos the individual identified as LIGOCKI is wearing distinctive apparel which consisted of American flag themed pants and jacket, as well as an American flag-themed baseball cap with bill turned up. This cap appears to be the same cap as LIGOCKI was wearing on his Facebook cover photo (Figure 1). He is also carrying a “Stop the Steal” cardboard sign and is swinging a flag pole at officers which had a blue “Trump” flag attached to it.

As part of the investigation FBI Springfield obtained a search warrant for LIGOCKI’s Facebook account (<https://www.facebook.com/lance.ligocki> / user ID 100001756514025). A review of the search warrant results revealed numerous images and one 31-second video confirming LIGOCKI’s attendance at and participation in protest events at and near the U.S. Capitol grounds on January 6, 2021, as well as his distinctive apparel from that day.

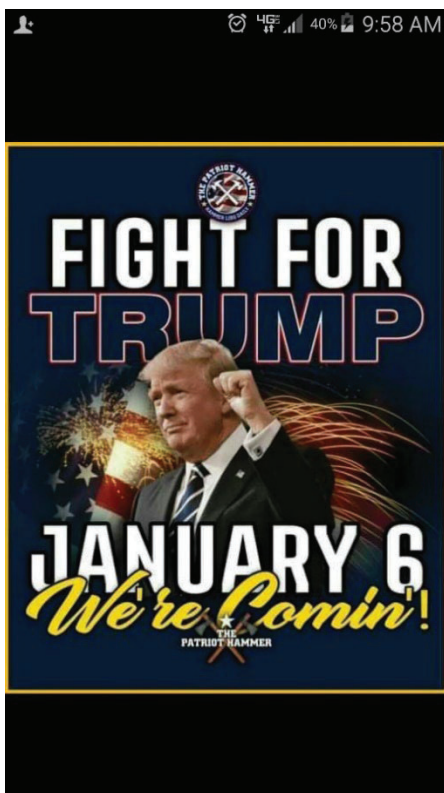


Figure 7



Figure 8



Figure 9



Figure 10

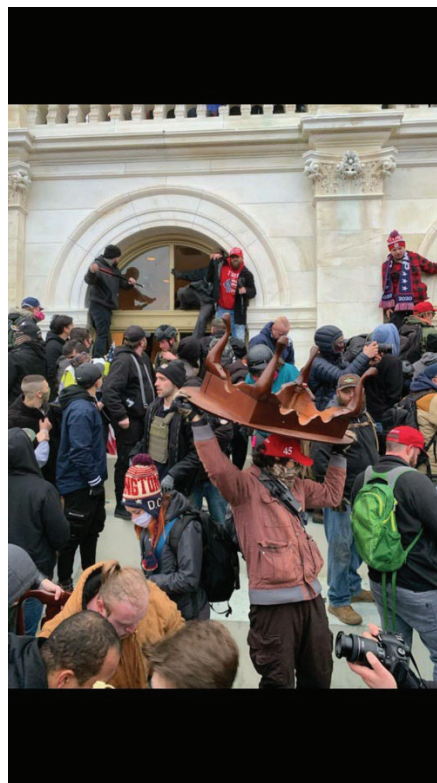


Figure 11

In Figure 8 and 9 above, LIGOCKI posts photographs of himself in a crowd with both the Capitol Dome (Figure 8) and the Peace Circle Monument from the Capitol (Figure 9) in the background. In addition, in both photographs he is wearing the same distinctive clothing and upturned flag-themed baseball cap and carrying a Trump flag and pole as in the earlier described videos. In addition, a cardboard “Stop the Steal” sign is visibly displayed by LIGOCKI in Figure 9.

Figures 10 and 11 are photographs posted on his Facebook account which both depict the mob of rioters on the steps leading up to the Lower West Terrace Tunnel doors, consistent with LIGOCKI’s identification at that exact location in the videos described earlier.

A review of the search warrant results also revealed numerous messages by LIGOCKI to other Facebook users confirming his attendance at and participation in protest events at and near the U.S. Capitol grounds on January 6, 2021, including the following:

- “it was awesome. no one understands how strong and powerful we are. yes I’m good back st the parking garage about to loose service” [user Lance Ligocki to user N.P. on 01/07/2021 at 0:49:16 (UTC) in response to N.P. asking Ligocki if he was okay]

- “we did breech the capital. I’ll give you more details soon. after trumps speech we marched to the capital waiting in pence and polosi” [user Lance Ligocki to user N.P. on 01/07/2021 at 0:53:47 (UTC)]
- “Good deal. We made it to the Capital” [user Lance Ligocki to user “Office on Main” on 01/07/2021 at 18:14:58 (UTC)]
- “Best advice I can give you from yesterday is get a full face gas mask” [user Lance Ligocki to user D.F.M. on 01/08/2021 at 4:31:23 (UTC)]
- “We marched right to through the capitol we stopped because we chose to” [user Lance Ligocki to user D.F.M. on 01/08/2021 at 4:47:18 (UTC)]
- “We couldn’t be stopped. They shot that un armed woman out of fear and they mased a woman so many times in the face she Suffocated to death” [user Lance Ligocki to user D.F.M. on 01/08/2021 at 4:48:27 (UTC)]
- “I’m 72 hrs. Posting pics of me at the rally. We are and it’s unbelievable. Trump is a lone Wolf, Pence is a snake and we the people are being silenced” [user Lance Ligocki to user T.T. on 01/09/2021 at 16:53:32 (UTC) in response to a conversation with T.T. about being banned on Facebook]
- “Everyone I seen is ready to fight. No one wants to talk anymore. I see a civil war of some sort coming” [user Lance Ligocki to user T.T. on 01/09/2021 at 16:55:56 (UTC)]

FBI Springfield interviewed a former employer of Lance Michael LIGOCKI, who employed LIGOCKI for approximately five years ending in approximately November 2022. During the interview, the former employer was shown four images, including LIGOCKI’s Facebook cover photo (Figure 1) and his Illinois driver’s license photo, which he advised were “definitely” LIGOCKI, and the following two images from the January 6, 2021 Capitol riot (Figures 12 and 13) which he advised appeared to be LIGOCKI.



Figure 12



Figure 13

The former employer further advised that he knows LIGOCKI was in Washington, D.C. on January 6, 2021, because he had conversations with LIGOCKI about it. In addition, LIGOCKI showed the former employer multiple photographs on his cell phone from the events of January 6th. The former employer stated that he recognized the distinctive attire in the above images shown to him during the interview as the same or similar to the attire LIGOCKI was wearing in the photos he showed him on his cell phone.

In summary, on January 6, 2021, LIGOCKI interfered with and assaulted law enforcement officers while on the U.S. Capitol grounds as they performed their duties, to include swinging a flag pole at officers multiple times at the edge of the Lower West Terrace entrance.

Based on the foregoing, your affiant submits there is probable cause to believe that LIGOCKI committed a felony violation of Title 18, U.S.C. § 111(a)(1), which makes it unlawful to forcibly assault, resist, oppose, intimidate, or interfere with any person or persons while engaged in or on account of the performance of official duties. For purposes of Section 111(a)(1), the person or persons in this instance were Metropolitan Police Department (MPD) and United States Capitol Police Officers responding to the siege of the United States Capitol. Through my investigation, I know that MPD officers at the Capitol on January 6th were present specifically to assist federal law enforcement in their efforts to protect the Capitol and the people inside, and were assisting federal officers in the performance of their official duties as defined in 18 U.S.C. § 1114.

Your affiant further submits there is probable cause to believe that LIGOCKI violated Title 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.

Your affiant also submits that there is probable cause to believe that LIGOCKI 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 so; 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; and 18 U.S.C. § 1752(a)(4), which makes it a crime to knowingly engage in any act of physical violence against any person or property in any restricted building or grounds; 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.

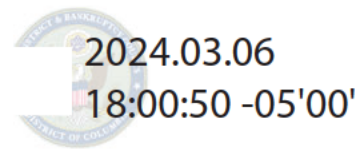
Finally, your affiant submits there is also probable cause to believe that LIGOCKI violated Title 40 U.S.C. § 5104(e)(2)(D) and (F) which makes it a crime to willfully and knowingly; (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds 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, (F) engage in an act of physical violence in the Grounds or 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 6th day of March 2024.

s/Robin M. Meriweather



HON. ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

Lance Michael Ligocki

) Case: 1:24-mj-00092
) Assigned To : Judge Robin M. Meriweather
) Assign. Date : 3/6/2024
) Description: COMPLAINT W/ARREST WARRANT
)
)

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Lance Michael Ligocki, who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

Title 18, U.S.C. § 111(a)(1) - Assaulting, Resisting, or Impeding Certain Officers;
 18 U.S.C. § 231(a)(3) - Obstruction of Law Enforcement During Civil Disorder;
 18 U.S.C. § 1752(a)(1), (a)(2), and (a)(4)- Entering and Remaining; Disorderly and Disruptive Conduct; and, Engaging in Physical Violence in a Restricted Building or Grounds;
 40 U.S.C. § 5104(e)(2)(D), and (e)(2)(F), Disorderly Conduct and Acts of Physical Violence in the Capitol Grounds or Buildings.

Date: 03/06/2024

s/Robin M. Meriweather

2024.03.06
 18:00:24 -05'00'

Issuing officer's signature

City and state: Washington, D.C.

Robin M. Meriweather, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____ at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

LANCE MICHAEL LIGOCKI
Defendant.

Case: 1:24-mj-00092
Assigned To : Judge Robin M. Meriweather
Assign. Date : 3/6/2024
Description: COMPLAINT W/ARREST WARRANT

VIOLATIONS:

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

ORDER

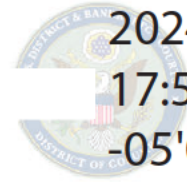
This matter having come before the Court pursuant to the application of the United States to seal criminal complaint, the Court finds that, because of such reasonable grounds to believe the disclosure will result in flight from prosecution, destruction of or tampering with evidence, intimidation of potential witnesses, and serious jeopardy to the investigation, the United States has established that a compelling governmental interest exists to justify the requested sealing.

1. IT IS THEREFORE ORDERED that the application is hereby GRANTED, and that the affidavit in support of criminal complaint and other related materials, the instant application to seal, and this Order are sealed until the arrest warrant is executed.

2. IT IS FURTHER ORDERED that the Clerk’s office shall delay any entry on the public docket of the arrest warrant until it is executed.

Date: March 6, 2024

s/Robin M. Meriweather



2024.03.06

17:59:03

-05'00'

HONORABLE ROBIN M. MERIWEATHER
UNITED STATES MAGISTRATE JUDGE