

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.

Celena Gabrielle Belton

DOB: [REDACTED]

Bennett Andrew Blair

DOB: [REDACTED]

Defendant(s)

) Case: 1:24-mj-00294

) Assigned To : Judge G. Michael Harvey

) Assign. Date : 9/18/2024

) Description: COMPLAINT W/ARREST WARRANT

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) - Entering and Remaining in any Restricted Building or Grounds Without Lawful Authority,

18 U.S.C. § 1752(a)(2) - Disorderly and Disruptive Conduct in a Restricted Building or Grounds,,

40 U.S.C. § 5104(e)(2)(D) - Disorderly Conduct in a Capitol Building or Grounds, and,

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.*Printed name and title*Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone.Date: 09/18/2024*Judge's signature*City and state: Washington, D.C.G. Michael Harvey, U.S. Magistrate Judge*Printed name and title*

Your affiant, [REDACTED], is a Task Force Officer with the Federal Bureau of Investigation (FBI) assigned to the [REDACTED] Joint Terrorism Task Force (JTTF). Prior to being assigned to the JTTF, I worked as a Detective for the [REDACTED] County Police Division. In my duties as a Detective/Task Force Officer, I have gained training and experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, the exploitation of lawfully obtained evidence and data, and various other procedures. In addition to my regular duties, I am also currently reviewing public tips, videos, and documentation, among other evidence, associated with the riots and civil disorder that occurred on January 6, 2021, in and around the United States Capitol. As a Task Force Officer, I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of a violation of Federal criminal laws.

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, 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.

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.

Identification of Bennett Blair and Celena Belton

Following the January 6, 2021 attack on the Capitol, I received and reviewed multiple tips submitted by members of the public. On February 1, 2021, I received a tip that BENNETT ANDREW BLAIR (“BLAIR”) was inside the U.S. Capitol building.

On March 24, 2021, I interviewed Individual 1, who submitted to the FBI a screen recording from a Snapchat reel posted on or about January 6, 2021 under the vanity name “mudbently123.” Individual 1 stated that they did not know the person in the video personally but knew his name to be BENNETT BLAIR. Individual 1 was sent the Snapchat videos/photograph by a friend who was reluctant to get involved. This friend did know BLAIR personally. The friend used to frequent a club in Washington D.C. where Individual 1 believed BLAIR worked as a bouncer.

Upon receiving this information, I compared a known image of BLAIR obtained from the Virginia Department of Motor Vehicles to images and surveillance footage obtained by law enforcement at and around the U.S. Capitol on January 6, 2021. By comparing the Virginia Department of Motor Vehicles photograph to the surveillance footage, I believe that BLAIR is captured on surveillance footage entering the U.S. Capitol on January 6, 2021.

Review of the video submitted to FBI by Individual 1 indicates BLAIR posted a video on the Snapchat account “bently123,” with the vanity name “mudbently123.” The Snapchat video depicts several scenes. The first scene shows BLAIR, wearing a gray hooded sweatshirt with a black face mask stating, “we just fucking stormed the Capitol. We stormed the fucking Capitol. Look what we are doing baby. Taking this country back!” (Figure 1). BLAIR then turned the camera around to show the crowd and a group of uniformed police officers on the Lower West Terrace of the U.S. Capitol building (Figure 2).



Figures 1 & 2: Screenshots from Snapchat videos showing BLAIR (left) and the exterior of the U.S. Capitol (right)

According to records provided by Snapchat, the display name “mudbently123” is associated with User ID “bently123,” email address ben.blairXXX@XXX.com, and telephone number XXX-XXX-3658.

According to records provided by TracFone for phone number XXX-XXX-3658, no name is associated with this number, however, a date of birth of 5/15/1995 is listed in the subscriber information. BLAIR’s date of birth is 5/15/1995.

Google records show an account associated with XXX-XXX-3658. The Google Pay account benwithsamXXX@XXX.com is associated with BENNETT A. BLAIR with a phone number of XXX-XXX-3658. The account address is associated with a Virginia zip code of 23238. This zip code matches BLAIR’s previous address in Richmond, Virginia.

According to records obtained through a search warrant which was served on VERIZON, on January 6, 2021, in and around the time of the incident, the cellphone associated with XXX-XXX-3658 was identified as having utilized a cell site consistent with providing service to a geographic area that included the interior of the U.S. Capitol building.

Additional records obtained from VERIZON place this cell phone connecting to a tower in Henrico County, Virginia on January 6, 2021 at 6:11 a.m. At 9:36 a.m. the cell phone connected to a cell phone tower in Washington D.C. At 4:35 p.m., the cell phone connected to another tower in Washington D.C. The next connection was on January 7, 2021 at 9:25 a.m. back in the Richmond, Virginia area.

The next scene in the Snapchat video provided by Individual 1 shows the inside of the U.S. Capitol, specifically the Senate Wing Door vestibule. Uniformed police wearing crowd control/riot gear are facing the rioters (Figure 3). In the video, rioters are screaming “Traitors!” at the police line.



Figure 3: Screenshot from BLAIR’s Snapchat video showing the inside of the U.S. Capitol building.

The next scene in the Snapchat shows a selfie-style photograph of BLAIR and a female with light colored hair and a red “Trump” baseball hat, later identified as CELENA BELTON. As seen below, the photo is labeled “United States Capitol Rotunda, Washington, D.C.” (Figure 4).



Figure 4: Selfie-style photograph taken by BLAIR and posted on Snapchat, with a geo-tag of “United States Capitol Rotunda, Washington, DC”

On June 2, 2021, an FBI agent interviewed Individuals 2 and 3, who have a close relationship to BLAIR. During the interview, Individuals 2 and 3 were shown a cropped screenshot of the male and female from the Snapchat video seen above in Figure 4. Individuals 2 and 3 identified BLAIR as the male in the photograph and the woman next to him as CELENA. They noted that BELTON is BLAIR’s girlfriend, whom they had met once in person.

On June 3, 2021, I spoke to BLAIR in person at the Subject Premises. After interviewing BLAIR and comparing his physical characteristics to the individual captured on video from inside the Capitol, I believe that BLAIR is the same person captured in the videos. BLAIR declined to make a statement regarding the events of January 6, 2021.

While at BLAIR’s residence on June 3, 2021, I observed a light-colored Hyundai with Virginia registration UPX7346. Virginia Department of Motor Vehicle records show CELENA BELTON as the registered owner. I obtained a photograph of BELTON through Virginia Department of Motor Vehicle, and I believe it is the same female individual in BLAIR’s Snapchat photograph, as seen in Figure 4, and in the open-source and security footage from the U.S. Capitol on January 6, 2021. BELTON’s vehicle has been routinely observed parked in front of or in the driveway of BLAIR’s residence, as recently as June 26, 2024.

I received information that an individual (Individual 4) had reported to the FBI that BELTON of Richmond, Virginia had been inside the U.S. Capitol building on January 6, 2021. I interviewed Individual 4. Individual 4 said that they had been told BELTON was in the U.S. Capitol on January 6, 2021 by a third party, but that BELTON had not told them this herself. Individual 4 knew BELTON personally. I showed Individual 4 a screenshot from BLAIR’s

Snapchat video (*see* Figure 4), and Individual 4 identified the female as BELTON and stated the male “might be [BELTON’s] new boyfriend Bennett.”

Records provided by T-Mobile identified the subscriber of phone number XXX-XXX-7372 as CELENA BELTON. Call detail records from January 6, 2021 show this cell phone connected to cell phone towers in Henrico County, Virginia at 6:11 a.m. At 10:16 a.m., this cell phone connected to a cell phone tower located in Arlington, VA on a sector that faced Washington, D.C. At 1:28 p.m., this phone connected to a tower near Pennsylvania Avenue in the area around the White House. At 2:19 p.m. and 2:44 p.m., this phone connected to towers in the area of the U.S. Capitol. At 8:10 p.m., the cell phone connected to towers in Henrico County, Virginia.

Bennett Blair and Celena Belton’s Conduct on January 6

Open-source footage from January 6, 2021 show BELTON and BLAIR on the Northwest Lawn of the U.S. Capitol grounds. BLAIR, wearing a gray hooded sweatshirt, black face mask, and flag draped around his shoulders, is seen pumping his fists in the air several times as rioters scaled the walls of U.S. Capitol, climbed the northwest staircase, and chanted “USA, USA!” (Figure 5). BELTON, seen next to BLAIR wearing a denim jacket, red baseball cap, and a flag draped around her shoulders, is seen taking out what appears to be a cell phone, peering down at the phone, then putting the phone in her pocket (Figure 6).



Figure 5: BELTON (circled in red) pumping his fists in the air several times as rioters scale the northwest staircase.

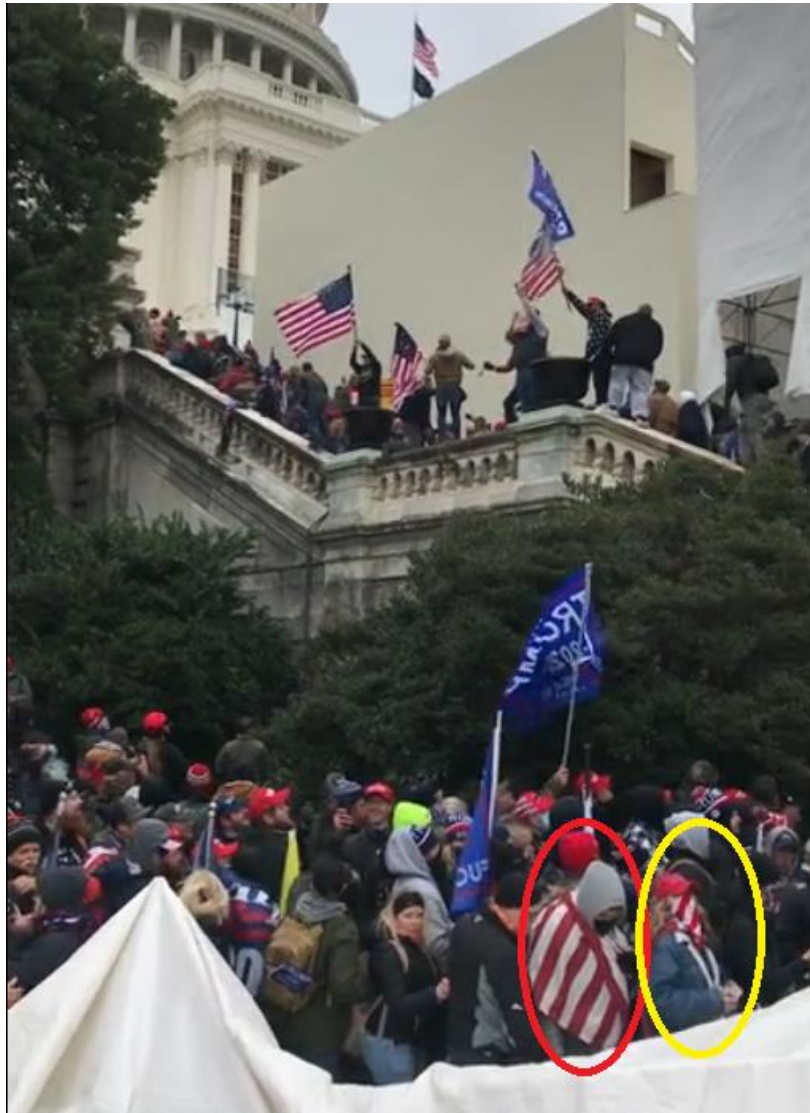


Figure 6: BELTON (circled in yellow) holding what appears to be a cell phone in her right hand.

The U.S. Capitol has closed-circuit television (CCTV) cameras, which captured the movements of BELTON and BLAIR on January 6, 2021. The camera in Figure 7 faces an exterior door, the Senate Wing Door, and two windows opening to the exterior of the U.S. Capitol building. Rioters began banging on the Senate Wing Doors at approximately 2:11 p.m. and breached the doors at approximately 2:13 p.m. A group of police officers regained control and secured the Senate Wing Door entrance at approximately 2:41 p.m. However, the rioters pushed through the line of police officers and breached the Senate Wing Doors for a second time at approximately 2:47 p.m.

CCTV shows BLAIR entered the U.S. Capitol through the Senate Wing Door at approximately 2:51 p.m., wearing his black mask, gray hooded sweatshirt, and what appears to be black gloves (Figure 7, below). BELTON immediately followed behind with her face covered by a red and white cloth (Figure 8). As seen in the photographs below, BELTON wore a red baseball cap, a denim jacket, and a flag draped over her shoulders.



Figure 7: BLAIR (circled in red) entering the U.S. Capitol through the Senate Wing Door at approximately 2:51 p.m.



Figure 8: BLAIR (circled in red) and BELTON (circled in yellow) entering the U.S. Capitol through the Senate Wing Door.

On the CCTV footage, I observed BLAIR using a cell phone. He appeared to be filming a line of police officers (Figure 9). This hallway has yellow walls that match the walls in the background of BLAIR's Snapchat video (Figure 3, above). In Figure 9, BELTON, circled in yellow, is standing next to BLAIR.

Additionally, in the foreground of this CCTV footage, I observed an unknown male with black sweatshirt, red and white baseball hat who is holding an electronic device, circled in blue in Figure 9. This individual can be observed in BLAIR's Snapchat video (see Figure 3), confirming that BLAIR was using his phone to film and create the Snapchat video inside the U.S. Capitol.

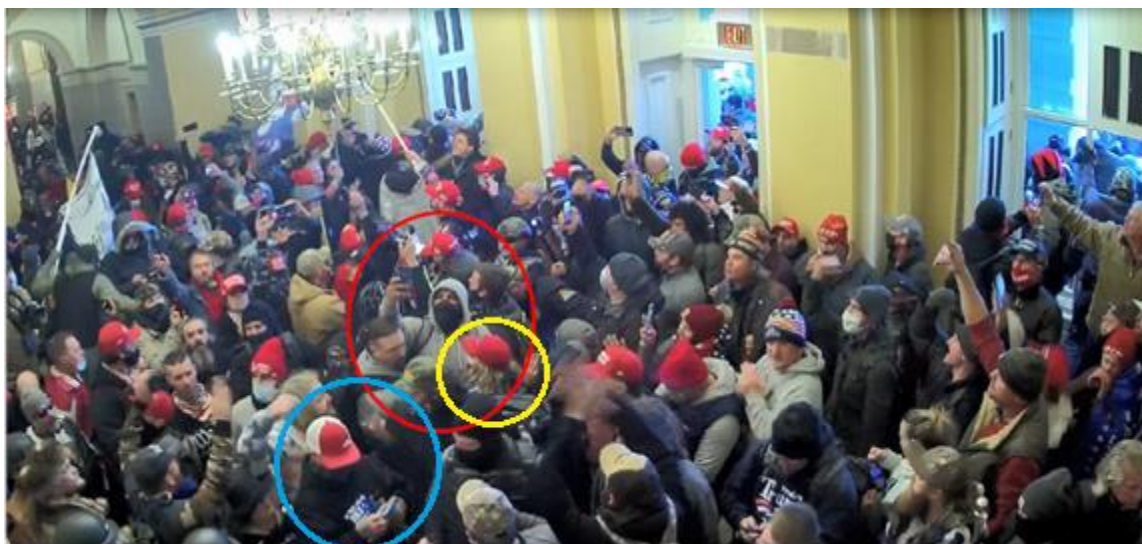


Figure 9: BLAIR (circled in red) using his cell phone to film the riot inside the U.S. Capitol.

While in the crowd, BLAIR pumped his fist in the air and appeared to be chanting. BLAIR and BELTON then moved to the left side of the video screen and continued further into the U.S. Capitol building, toward the Crypt.

BLAIR and BELTON later appeared on CCTV footage in the Crypt, sitting on a bench directly under the camera (Figure 10). In the CCTV footage, BLAIR appeared to be using his cell phone, pointing the camera toward himself and BELTON. The position of BLAIR and BELTON in the Crypt matches the selfie-style Snapchat photograph with the “United States Capitol Rotunda” caption (Figure 4 above, Figure 11 below).



Figure 10: CCTV footage of BLAIR (circled in red) and BELTON (circled in yellow) sitting on a bench in the Crypt of the U.S. Capitol.



Figure 11: Selfie-style photograph taken by BLAIR and posted on Snapchat and matching the CCTV footage from the Crypt.

A video taken by another person in the crowd and posted to Snapchat shows a group of rioters inside Senator Merkley's hideaway office, which is between the Senate Wing Door and the Crypt, at approximately 2:58 p.m. on January 6, 2021. I identified BELTON and BLAIR among the rioters captured on the video. BELTON is seated at a conference table smoking something. BLAIR is standing to the right of the table holding a cell phone. The following images are screenshots from this video (Figures 12 & 13).



Figure 12: BELTON (circled in yellow) lighting and smoking an object while seated at a table inside an office at the U.S. Capitol.



Figure 13: BELTON (circled in yellow) lighting and smoking an object while BLAIR (circled in red) appears to be filming or using his phone.

BLAIR and BELTON exited the U.S. Capitol through the Senate Wing Doors at approximately 3:14 p.m. (Figure 14). They remained inside the U.S. Capitol for approximately 23 minutes and on restricted Capitol grounds for even longer.

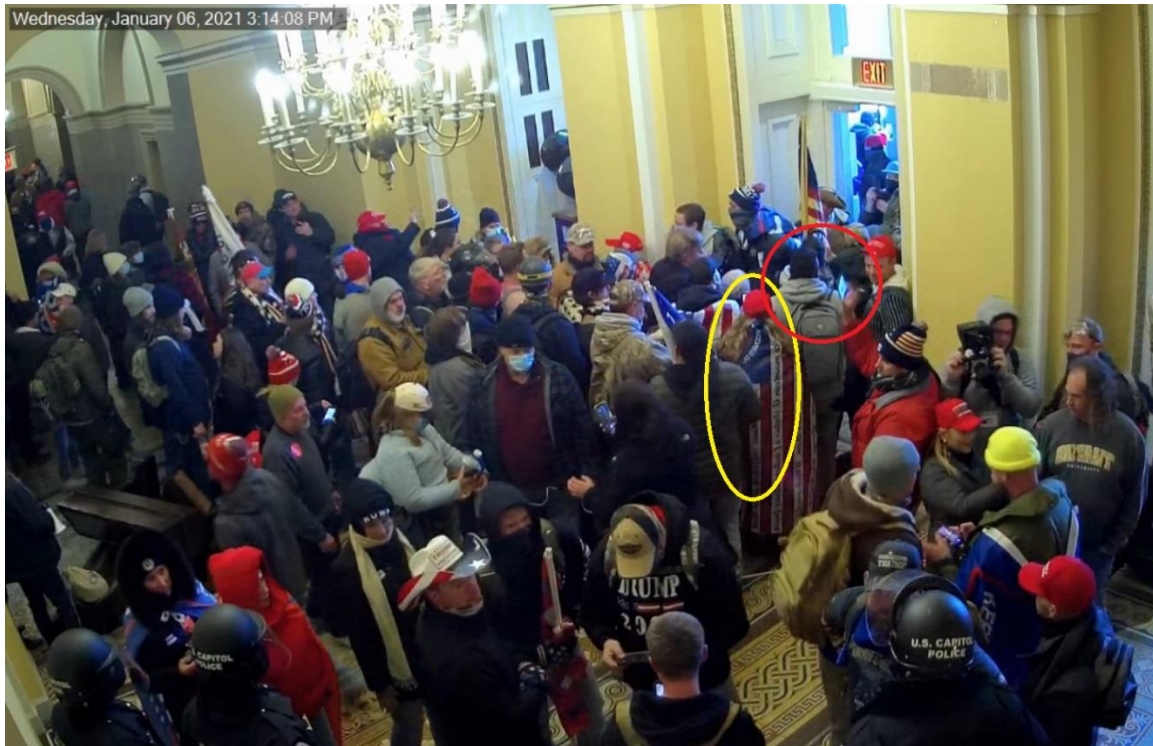
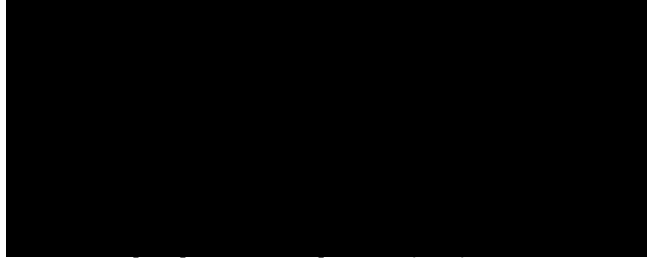


Figure 14: BELTON (circled in yellow) and BLAIR (circled in red) exiting the U.S. Capitol through the Senate Wing Doors at approximately 3:14 p.m.

Based on the foregoing, I submit that there is probable cause to believe that BENNETT BLAIR and CELENA BELTON 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.

I submit there is also probable cause to believe that BENNETT BLAIR and CELENA BELTON violated 40 U.S.C. § 5104(e)(2)(D) and (G), which make it a crime to willfully and knowingly (D) 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 18th day of September 2024.

HONORABLE G. MICHAEL HARVEY
U.S. MAGISTRATE JUDGE