

STATEMENT OF FACTS

Your affiant, Trevor Culbert, is a Special Agent with the Federal Bureau of Investigation (FBI), and has been so employed since March 2004. In my duties include investigating violations of the laws of the United States, specifically investigations related to domestic and foreign terrorism. I have received training in the preparation, presentation, and service of arrest warrants, and have been involved in the investigation of numerous types of offenses against the United States, including those who knowingly enter or remain in any restricted building or grounds without lawful authority to do so. Your affiant is vested with the authority to investigate criminal acts under Title 18 and Title 40 of the United States Code.

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 a violation of Federal criminal law.

The information contained in this affidavit is based upon my personal knowledge, training, experience, my consultation with other experienced law enforcement officers, and the investigation conducted by myself and other law enforcement officers. I have not included each and every fact known to me concerning this investigation. Due to the fact that this affidavit is being made to establish probable cause, your affiant had not listed each and every fact known regarding the investigation of this incident.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police (USCP). Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by USCP. 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 USCP 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 USCP 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 USCP, 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. One of the individuals who was inside the Capitol without authority to be there has been identified as Israel Mark Matson (Matson).

Law enforcement investigated Matson based on information and photographs of him inside and outside the U.S. Capitol. In most of the photographs and videos of the defendant, he is wearing a red colored beanie cap with white lettering, rust colored jacket, orange/rust colored backpack with red/orange colored hair, darker colored pants and shoes, and carrying a red/white colored bullhorn.



Image 1 - Israel Matson walking to the U.S. Captiol on January 6, 2021.¹

¹ Source: YouTube - Alyssa Marotta (Alyssa1979M) The March! Washington DC January 6 2021 https://www.youtube.com/watch?v=z_7Q8Tzlr7I&t=1017 Timecode: 16:56



Image 2 -- Matson at the base of the U.S. Capitol on January 6, 2021 ²

Law enforcement confirmed Matson's entry into the U.S. Capitol on that day. Matson was captured on several different Closed Circuit Television (CCTV) cameras and open source materials within the United States Capitol. Matson entered the United States Capitol through the upper west terrace door at approximately 2:33 p.m.



Image 3 – Matson entered the West Terrace door

² Instagram - nypig 10000000_189067622928804_4135094021950698279_n.mp4
https://www.instagram.com/tv/CJt_w4rjT9q/?utm_source=ig_web_copy_link Timecode: 3:25

He proceeded to inside the U.S. Capitol Building where he entered the South Rotunda and departed toward Statuary Hall.

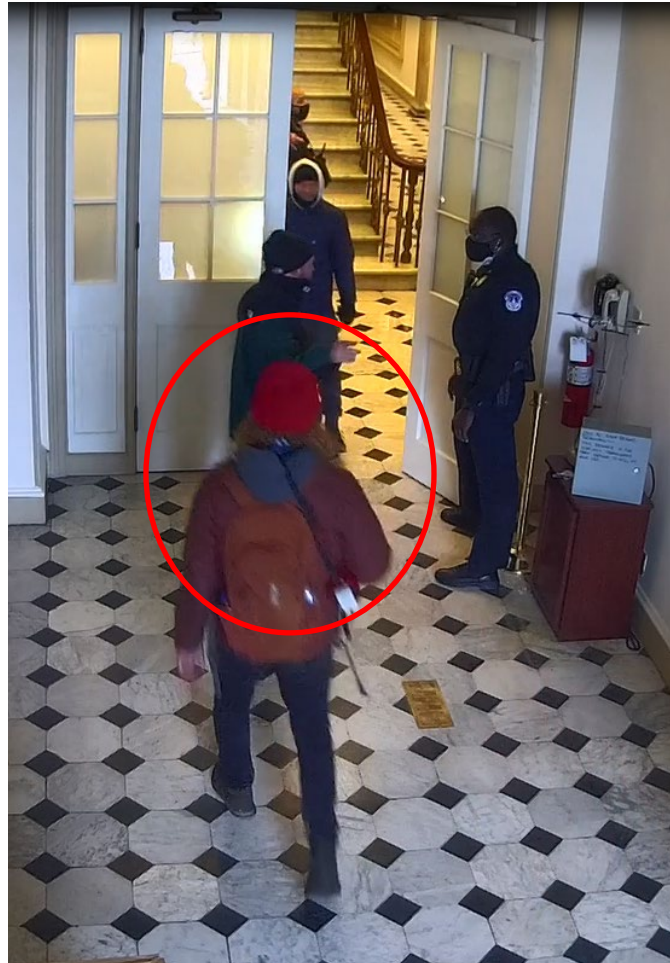


Image 4

The defendant entered the South Rotunda and departed toward Statuary Hall between 2:34:36 p.m. and 2:34:58 p.m.



Image 5

Matson then entered the Statuary Hall and walked into the Statuary Hall Connector.



Image 6

Matson entered the Statuary Hall Connector to the House of Representatives Chamber. Matson was not visible on CCTV between 2:37:40 and 2:51:46 indicating Matson may have entered the House of Representatives Chamber for approximately 14 minutes.



Image 7



Image 8 - Matson at the doors leading to the House of Representatives Chamber.³

Matson walked back towards Statuary Hall in the Hall Connector at approximately 2:52 p.m. to the South Rotunda.

³ Twitter - RichieMcGinniss RichieMcG - Here is the moment I arrived at the doors to The House.h264.mp4 Timecode: 0:14

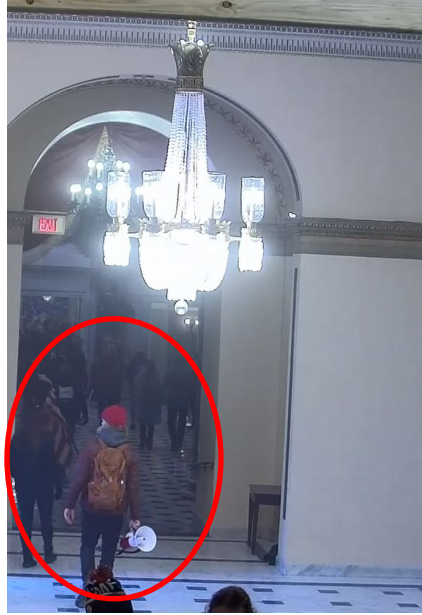


Image 9



Image 10

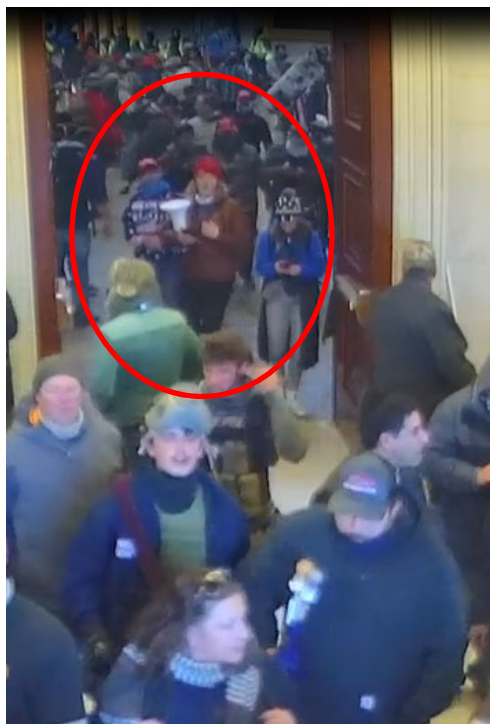


Image 11

Matson then entered the North Rotunda and gave the bullhorn to a female . He remained in the North Rotunda for approximately 6 minutes.

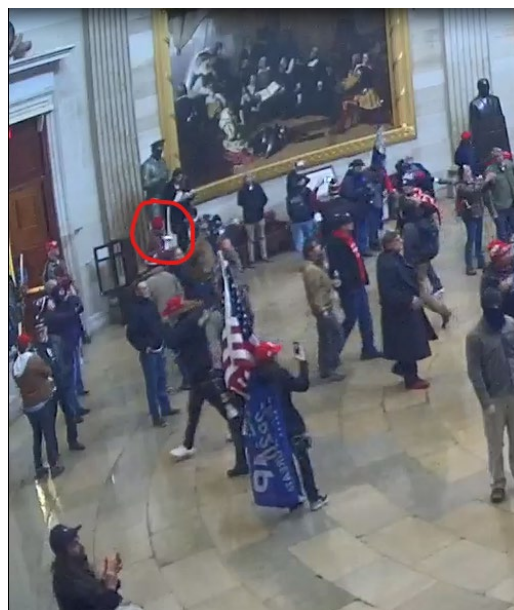


Image 12



Image 13⁴

Matson left the North Rotunda and entered the Great Rotunda.

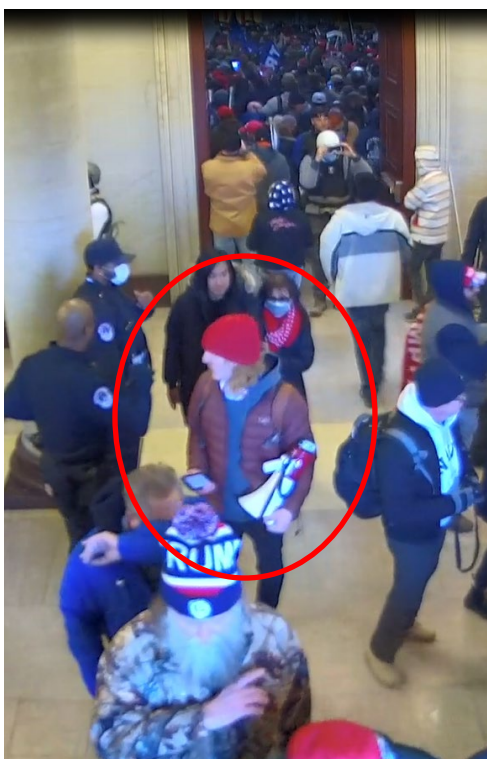


Image 12

⁴ Court Document Screenshots & Case Files - James McGrew - Video 13.h264.mp4
https://propublica-data-j6cases-videos.s3.us-east-1.amazonaws.com/983b83301eed013a64612cde48001122.mp4?_ga=2.202635218.235702899.1638144294-233311640.1635534856 Timecode: 0:01

Matson left the Great Rotunda and departed the U.S. Capitol Building at approximately 3:05 p.m after having remained inside for approximately thirty-two minutes.

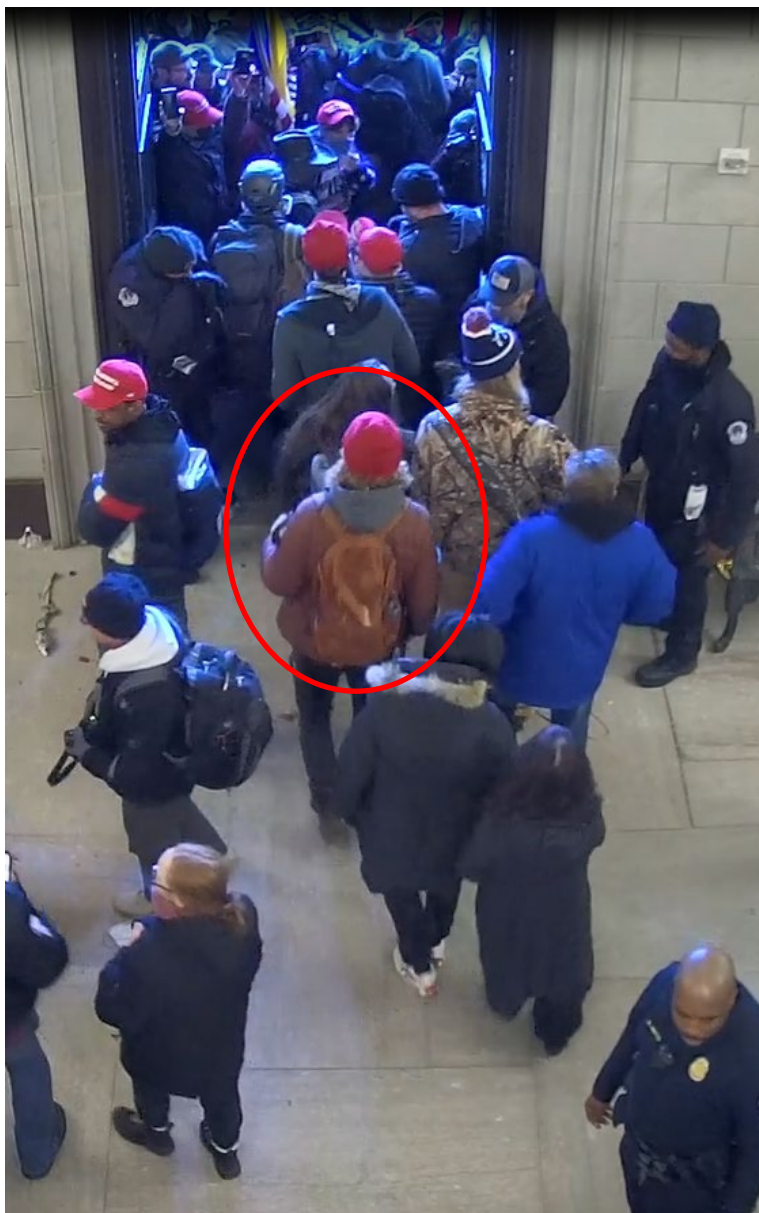


Image 13

Law enforcement reviewed a Utah Driver's License for Matson which indicated a residence in Ogden, Utah. The person in the Utah Driver's License resembled the person identified as Matson in the photographs herein. On April 19, 2022, the FBI interviewed Matson at his address in Ogden, Utah. During the interview, Matson admitted he flew from Salt Lake City, Utah to North Carolina where he met a family member and drove to Washington, D.C. to attend the rally in Washington, D.C, on January 6, 2021. Matson confirmed it was him in Images 1, 2, 8, and 13

of himself in and outside of the U.S. Capitol. Matson stated he entered the Capitol's central door, eventually making it into the House of Representative's area. Later, he entered Statutory Hall and provided his bullhorn to a female who asked to use it. After hearing reports of a shooting in the building, Matson decided to leave. Matson admitted that since January 6, 2021, the defendant had been searching online for himself in videos and photographs documenting the events of January 6, 2021. He further advised he would accept any consequence he may have to face for his actions on January 6, 2021.

Based on the foregoing, your affiant submits that there is probable cause to believe that Israel Mark Matson 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 Israel Mark Matson violated 40 U.S.C. § 5104(e)(2)(D) and (G), 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 Trevor Culbert
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone, this 17th day of July 2023.

ROBIN M. MERIWEATHER
U.S. MAGISTRATE JUDGE