Case 1:23-mj-00363-ZMF Docume Assigned To : Faruqui, Zia M. Assign. Date : 12/21/2023 Description: COMPLAINT W/ARREST WARRANT

STATEMENT OF FACTS

Your affiant, **Sector**, is a Special Agent with the Federal Bureau of Investigation assigned to the Philadelphia Field Office. In my duties as a Special Agent, I have investigated and participated in the investigation of criminal activity, including, but not limited to: crimes against persons, crimes against property, and conspiracy against civil rights. During these investigations, I have participated in the execution of arrest warrants and search warrants during which the seizure of evidence indicating the presence of criminal violations occurred. In addition, I have conducted or participated in physical surveillance, debriefing of informants, interviews, and reviews of records and recordings. From these experiences, and from related training, I have become familiar with the ways in which persons coordinate, carry out, and conceal criminal activity. Currently, I have been 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 laws.

The United States Capitol

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.

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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.

Christopher Taylor's Activities on January 6, 2021

On or about December 8, 2021, the Federal Bureau of Investigation (FBI) received a tip that Christopher TAYLOR was among the crowd that forced entry into the U.S. Capitol building on January 6, 2021. According to the information, TAYLOR admitted to the tipster that he'd entered the U.S. Capitol building on that day.



Figure 1

Figure 1 shows Christopher TAYLOR's image maintained by the Pennsylvania Department of Transportation. According to their records, Figure 1 was a photograph taken January 11, 2021.

On or about June 1, 2022, FBI personnel received a Digital Media review on Christopher TAYLOR. The review included a search through a database the FBI maintains on the many tips received from the public regarding the riots at the U.S. Capitol on January 6, 2021. The review uncovered open source digital footage depicting TAYLOR outside and inside the U.S. Capitol building on January 6, 2021.



Figure 2



Figure 2 and Figure 3 are open-source captures depicting TAYLOR wearing a camouflage hat and blue backpack on the U.S. Capitol grounds on January 6, 2021.



Figure 4

Figure 4 is an open source capture that appears to depict TAYLOR, who is wearing the camouflage hat and blue backpack, entering the U.S. Capitol building through the Senate Wing Door, while apparently filming on a cellphone.

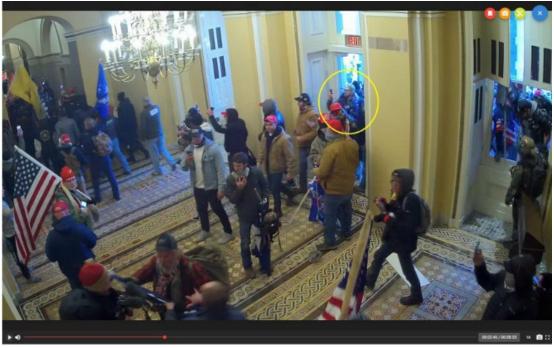


Figure 5

Figure 5 is a CCTV-video capture that shows TAYLOR entering the Capitol building at 2:23 p.m. on January 6, 2021 through the Senate Wing Door.



Figure 6 and Figure 7 are both open source captures that appear to depict TAYLOR in the hallway of the U.S. Capitol building, filming himself inside the building with a cellphone.



Figure 8

Figure 8 appears to depict TAYLOR walking inside the U.S. Capitol building, and entering an office space on, January 6, 2021.



Figure 9

Figure 9 is a CCTV-video capture that depicts TAYLOR exiting the U.S. Capitol building through the Memorial Door on the east side of the Capitol at approximately 2:34 p.m. on January 6, 2021. In total, TAYLOR spent approximately 11 minutes inside the United States Capitol

In May 2023, Special Agents spoke with an individual who is familiar with Christopher TAYLOR and showed that person photographs of Christopher TAYLOR inside the United States Capitol on January 6, 2021. The individual positively identified Christopher TAYLOR in the photographs.

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

Your affiant submits there is also probable cause to believe that Christopher TAYLOR violated 40 U.S.C. § 5104(e)(2)(D) and (G), which makes it a crime to willfully and (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.



Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 21st day of December 2023.

ZIA M. FARUQUI U.S. MAGISTRATE JUDGE