

STATEMENT OF FACTS

Your affiant, [REDACTED], is a Special Agent with the FBI, currently assigned to the Houston Division of the Federal Bureau of Investigation. Currently, I am tasked with investigating criminal activity in and around the U.S. 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 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.

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 WILLIAM LYON

According to records obtained through a search warrant which was served on Google, a mobile device associated with the email address angramainyuXXX@gmail.com and the phone number 832-374-XXXX was present at the U.S. Capitol on January 6, 2021. The same records also showed that the recovery email address associated with this mobile device was lyonwilliaXXX@gmail.com. Google estimates device location using sources including GPS data and information about nearby Wi-Fi access points and Bluetooth beacons. This location data varies in its accuracy, depending on the source(s) of the data. As a result, Google assigns a “maps display radius” for each location data point. Thus, where Google estimates that its location data is accurate to within 10 meters, Google assigns a “maps display radius” of 10 meters to the location data point. Finally, Google reports that its “maps display radius” reflects the actual location of the covered device approximately 68% of the time. In this case, Google location data shows that a device associated with angramainyuXXX@gmail.com and telephone number 832-374-XXXX was within 100 feet of the U.S. Capitol building on January 6, 2021.

FBI Houston searched the 832-374-XXXX telephone number in a commercially available database and determined the number was associated with WILLIAM LYON. Using law enforcement databases, a driver’s license check on WILLIAM LYON was conducted, indicating LYON lived in Huntsville, Texas at the time.

Through subsequent investigation, the FBI Houston Field Office learned that a WILLIAM LYON traveled from Houston, Texas (IAH) to Dulles Airport (IAD) on January 5, 2021, and traveled from Baltimore (BWI) back to Houston (IAH) on January 8, 2021.

FBI Houston conducted interviews in Huntsville, Texas. One individual who had regular contact with LYON was shown images of LYON inside the Capitol building on January 6th, 2021. That individual was able to confirm the person indicated in the image below was LYON:

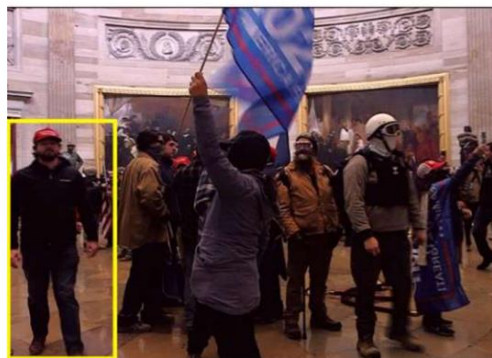


Image 1: An acquaintance of LYON identified him in this image taken inside the U.S. Capitol building on January 6, 2021

LYON'S Involvement in the Events of January 6, 2021

Investigators reviewed United States Capitol Police (“USCP”) CCTV and observed that on January 6, 2021, LYON wore a black jacket with a hoodie, blue jeans, and a red ball cap with a yellow logo on the side.

Through a review of open-source videos and images, the FBI learned that LYON met up in the morning on January 6 with another individual, ZACHARIAH BOULTON.¹ The two walked together from the Ellipse towards the U.S. Capitol building.



Image 2: LYON (yellow) and BOULTON (wearing green sweatshirt) walking towards the U.S. Capitol building on January 6.

As LYON approached the West Lawn, he could see bike racks serving as barricades. LYON continued onwards closer towards the Capitol building, and as he approached the West Plaza, he could see that rioters had climbed atop scaffolding intended for the inaugural stage, and a haze from chemical agents was visible in the air.



Image 3: A haze from chemical irritants was visible as LYON joined rioters on the West Plaza

¹ On November 7, 2023, BOULTON pleaded guilty to entering or remaining in any restricted building or grounds, in violation of 18 U.S.C. § 1752(a)(1).

As LYON walked through the Upper West Plaza, he could hear rioters chanting.



Image 4: LYON walking across the Upper West Terrace.

CCTV showed that LYON approached the Upper West Terrace Door at roughly 2:40 p.m. He was poised to enter, but backed away when a group of police blocked the entrance. Overwhelmed by the numbers of rioters, police moved away from the entrance and LYON entered the U.S. Capitol building at approximately 2:44 p.m.



Image 5: LYON entered the U.S. Capitol through the Upper West Terrace Door at 2:44 p.m.

After entering, LYON headed east and walked up a staircase to the second floor. LYON entered the Rotunda at roughly 2:45 p.m. LYON remained in the Rotunda or in close proximity to the Rotunda until roughly 3:09 p.m., and during that time, he could be observed speaking on his cellphone and walking around.



Image 6: LYON walked around the Rotunda until roughly 3:09 p.m.

In CCTV and open-source video, LYON can be seen exiting the U.S. Capitol building at roughly 3:10 p.m. through the Rotunda door.



Image 7: LYON exited the U.S. Capitol building at roughly 3:10 p.m.

Your affiant submits that there is probable cause to believe that LYON 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; (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 attempt or conspire 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 LYON violated Title 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, FBI

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 13th day of August 2024.

ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE