

STATEMENT OF FACTS

Your affiant, [REDACTED], is a Special Agent assigned to [REDACTED]. In my duties as a special agent, I investigate Domestic Terrorism threats to include matters related to Racially Motivated Violent Extremism (RMVE), Anti-Government, Anti-Authority Violent Extremism (AGAAVE), and other domestic threats which do not fall within RMVE or AGAAVE. 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 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 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.

Facts Specific to this Defendant

A. Christopher Sean Madison Outside of Capitol

On or about June 3, 2024, the undersigned reviewed several photos submitted from the public showing Madison at rallies in and around the U.S. Capitol as well as in the Washington, D.C. area during the January 6, 2021 timeframe. These photos were taken from press photos and publicly posted YouTube videos. In the photos, Madison is wearing distinctive clothing to include tan boots, blue jeans, a dark jacket, a tan sling style bag, a red ball cap, and a bicycle helmet over the cap as depicted in the photos below.



Figure 1 – Madison (circled in red) on lawn near Washington monument

Madison went to the Capitol after listening to former President Donald J. Trump at the “Stop the Steal” rally. See Figures 2 through 4 below.



Figure 2 – Madison (circled in red) with bicycle on Constitution Avenue



Figure 3 - Madison (circled in red) with bicycle on Constitution Avenue



Figure 4 – Madison (circled in red) on Northwest lawn near base of Northwest stairs

B. Madison Inside of Capitol

U.S. Capitol Police (USCP) images and surveillance footage show that the U.S. Capitol building was first breached via the Senate Wing Door at approximately 2:13 P.M. A review of U.S. Capitol surveillance camera data captured on January 6, 2021, confirms Madison entered the U.S. Capitol on January 6, 2021, at approximately 2:13 P.M. through the Senate Wing Door as seen in Figure 5 below.

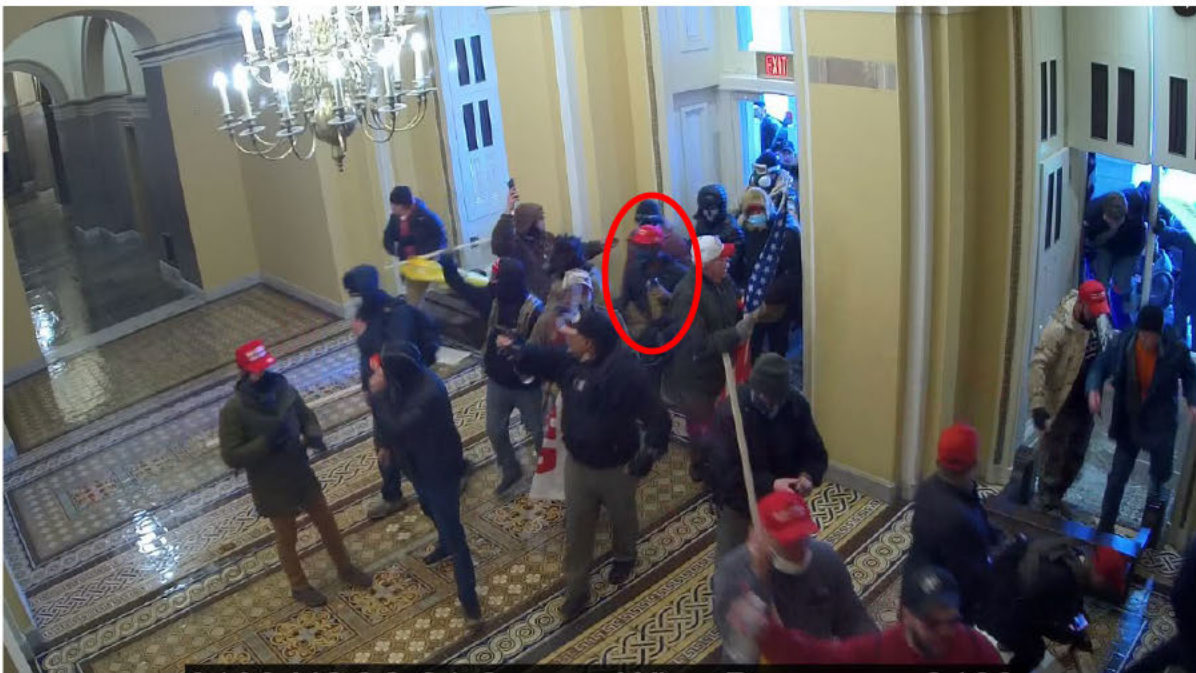


Figure 5 – Madison (circled in red) entering via the Senate Wing Door

After making entry into the Capitol, Madison initially walks in the direction of the Senate but eventually heads down the hall towards the Crypt. USCP had formed an impromptu police line in the Crypt to prevent the rioters from progressing further in entering the restricted Capitol building. Madison appeared to use his camera to film the rioters in the Crypt while standing atop furniture. *See Figure 6.*



Figure 6 – Madison (circled in red) standing on furniture while in the Crypt

Madison next appears a floor above where he entered the Capitol in the Rotunda area as seen below in Figure 7.

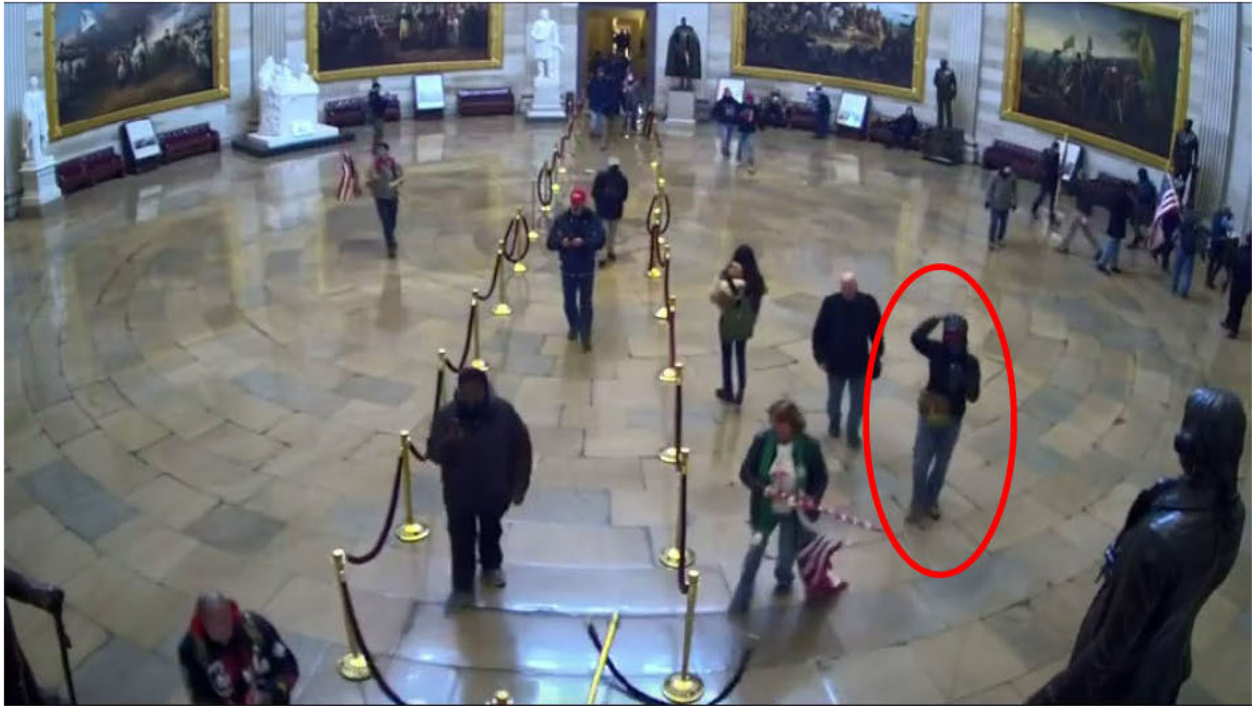


Figure 7 – Madison (circled in red) in the Rotunda

Madison walks South through the Rotunda and eventually enters the Statutory Hall where he is pictured below in Figures 8 and 9.



Figure 8 – Madison (circled in red)



Figure 9 – Madison (circled in red) recording with his cellphone or camera

Madison continued South through the Statutory Hall to the connector hall where he spent some time in a large group of people that were rallied in that area. Madison ultimately returned through the Statutory Hall after leaving the area South of it and was caught on several cameras walking through office areas on the Southwest corner of the Rotunda area as pictured below. See Figures 10-12.



Figure 10 – Madison (circled in red)

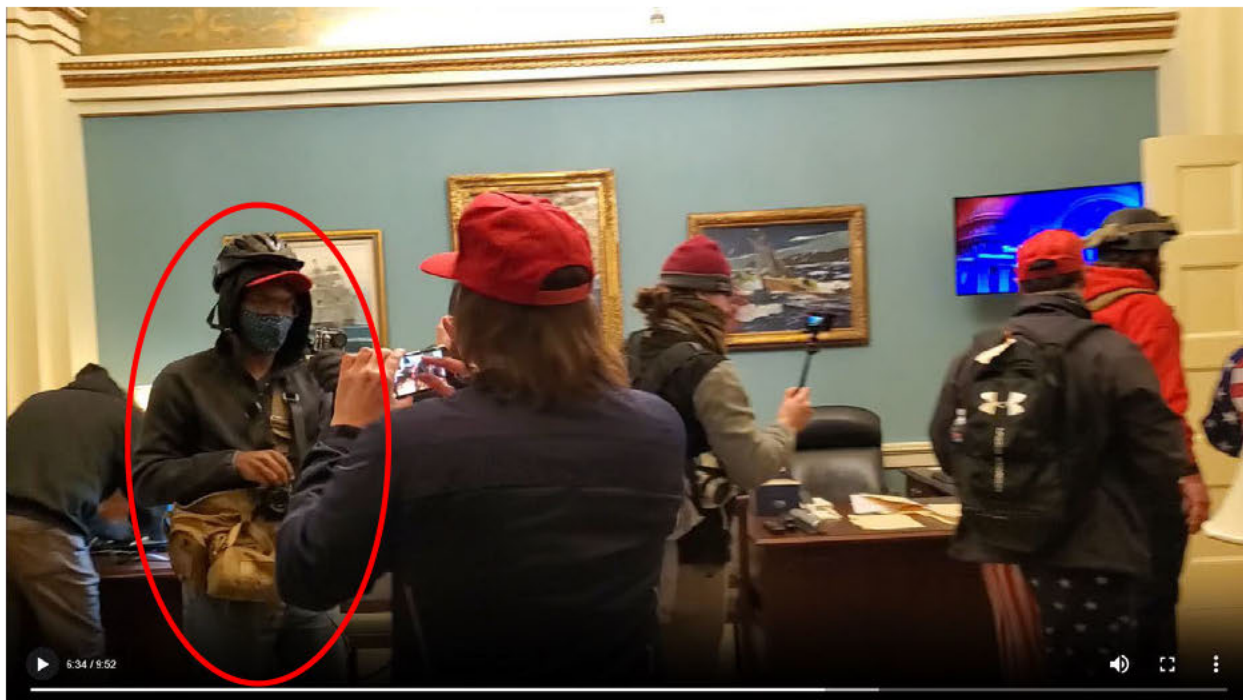


Figure 11 – Madison inside the office suite for the Speaker of the House



Figure 12 – Madison (circled in red) leaving former Speaker Nancy Pelosi's office

Madison worked his way East through the office corridors and Rotunda area and exited the Capitol from the second floor on the East side of the Capitol building at approximately 2:47 P.M. In total, Madison spent approximately 34 minutes inside the Capitol. See Figures 13-15 below.



Figure 13 – Madison (circled in red) crossing through the Rotunda on his way out of the Capitol building



Figure 14 – Madison (circled in red) approaching Rotunda Doors



Figure 15 – Madison (circled in red) exiting Rotunda Doors

III. Additional Facts Regarding the Identification of the Defendant

Although Madison resides in Winter Haven, Florida, on July 12, 2024, an FBI Task Force Officer (“TFO”) conducted physical surveillance at Madison’s relative’s residence in Dundee, Florida. That TFO observed Madison inside of the garage next to the driver side door of the black Honda, which is registered to Madison, and was able to see Madison’s face. That TFO further viewed videos and still images from January 6, 2021, in which Madison’s face was visible, and positively identified Madison as the same person shown in that video footage.

Based on the foregoing, your affiant submits that there is probable cause to believe that Christopher Sean Madison 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; 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 Christopher Sean Madison violated 40 U.S.C. § 5104(e)(2)(C), (D), and (G), which makes it a crime to willfully and knowingly (C) with the intent to disrupt the orderly conduct of official business, enter or remain in a room in any of the Capitol Buildings set aside or designated for the use of— (i) either House

of Congress or a Member, committee, officer, or employee of Congress, or either House of Congress; or (ii) the Library of Congress; (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.

[REDACTED]

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 24th day of September 2024.

Hon. Zia M. Faruqui
United States Magistrate Judge