

STATEMENT OF FACTS

Your affiant, [REDACTED], is a Special Agent with the Federal Bureau of Investigation assigned to the Atlanta Field Office. In my duties as a special agent, I am assigned to the Savannah Resident Agency. My work varies, but I primarily conduct investigations into gangs and violent crime in the Savannah area and surrounding areas. 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.

Identification of Leander Antwione Williams

In July 2021, the FBI began posting photographs and videos of an individuals to seek assistance from the public in identifying individuals who made unlawful entry into the U.S. Capitol building and grounds. Everyone was assigned a moniker for identity purposes, and one such individual was captioned ‘AFO-419.’



Figure 1: Six images of the individual now identified as Leander Antwione Williams that the FBI posted to its Capitol Violence page under the identifier AFO 419. Soon after, independent researchers assigned ‘AFO-419’ the hashtag “#RiotingGolfer,” a possible reference to the hat worn by the individual.

A collage was posted online in September 2022 to help identify the individual.

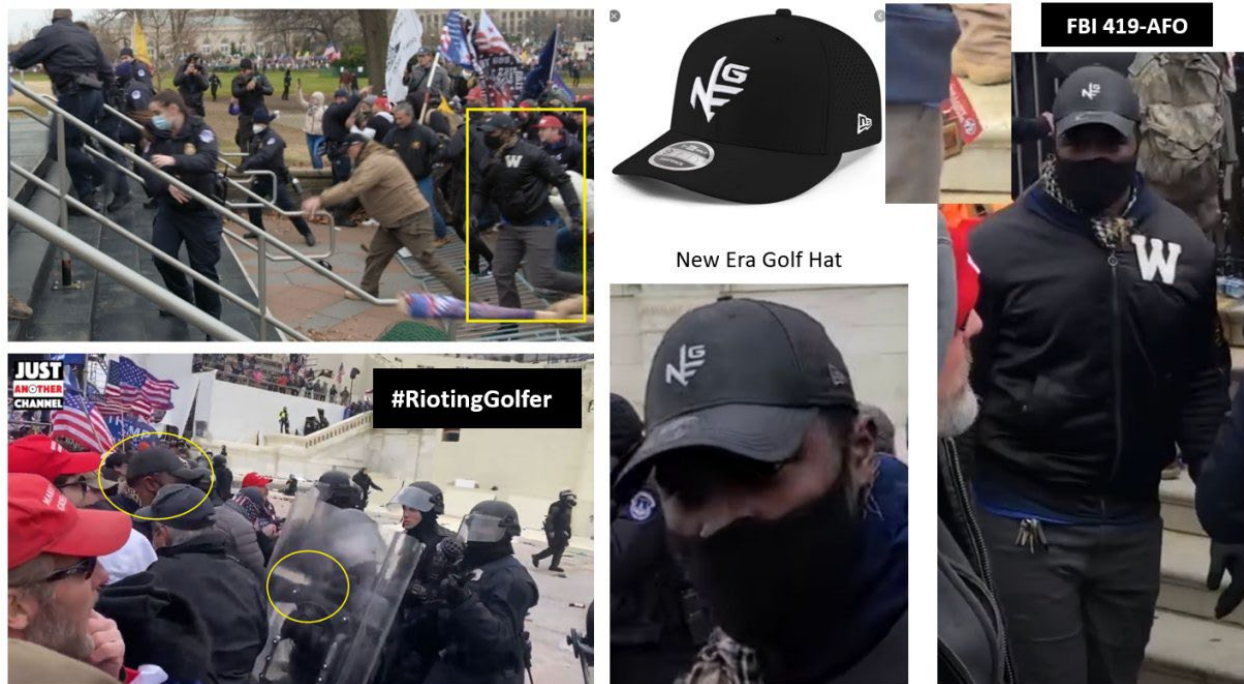


Figure 2: Collage posted online identifying AFO-419 as “#RiotingGolfer”

In December 2022, the FBI received a tip regarding the identity of an individual known as AFO-419/#RiotingGolfer. The tip included a link to a verified Instagram account with the handle “@twanyouafool” and with the name listed as “Antwione Williams.” The Instagram account has a publicly available photograph, dated April 11, 2019, in which Antwione Williams is wearing a New Era Golf hat.



Figure 3: Image post from Instagram account @twanyouafool

In two additional publicly available posts, Williams can be seen wearing a set of keys on his right hip. Within the set of keys is a red key fob that appears to have an automobile logo affixed to it.



Figure 4: On the left, an image posted October 15, 2022; in the center, an image posted November 23, 2021; on the right, a close-up image of the red key fob..

Camera footage from January 6, 2021 depicts Williams wearing a consistent key set on his right hip. See Figure 5 and 6.

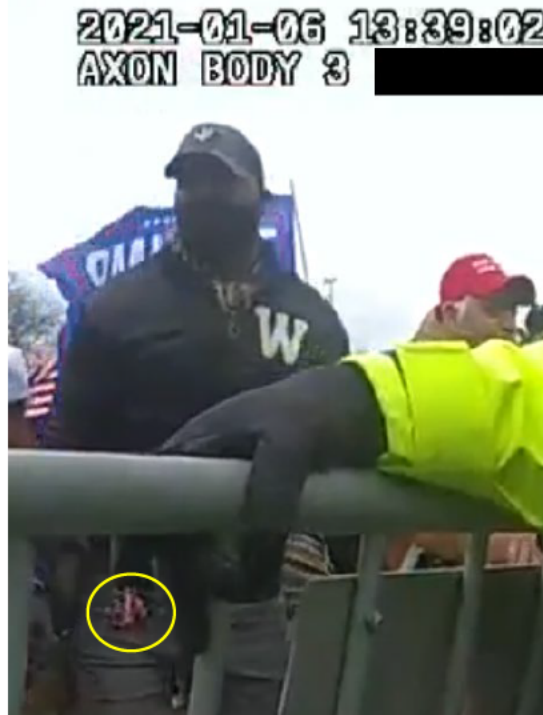


Figure 5: Body worn camera footage depicting the red key fob (circled in yellow)



Figure 6: Open-source camera footage depicting the red key fob (circled in yellow)



Figure 7: close-up cropping from publicly available video showing hat.

On July 21, 2023, FBI agents went to the address of record for Leander Antwione Williams. An individual came to the door and identified himself as Leander Antwione Williams. Agents were able to observe this individual clearly and from close distance. The agent noticed that at the time Williams spoke with them, Williams had a key fob with a red key hanging from his front right waist area.

The key fob's appearance is consistent with the appearance of a key fob used for several Chevrolet models, including Chevrolet Camaros from 2016 and later. Vehicle registration records indicate that a 2016 Chevrolet Camaro is registered to Williams. Below are additional images of the key fob:



Figure 8: Close-up cropping of red key fob. The left image shows a close-up cropping from Figure 6 showing the key fob on WILLIAMS'S front right waist area on January 6, 2021. The center and right images are from WILLIAMS'S verified Instagram account showing the red key fob positioned at the same location.



Figure 9: After-market key fob cover available for Chevrolet vehicles

In December 2023, a Capitol Visitor Assistance employee handed a folded piece of paper to a uniformed officer with the United States Capitol Police that read “FBI Capitol Violence photo #419 AFO” The note then identified two other employees of the Capitol complex. On March 22, 2024, your affiant received photographs of the two identified employees. Based on review of the photographs, both employees could be excluded as potentially being AFO-419. Each of the two lacked a similar height, weight, and stature of AFO-419.

Based on my review of numerous high-quality photographs and videos showing AFO-419/#RiotingGolfer on the restricted grounds of the U.S. Capitol, including but not limited to those pictured and referenced in this affidavit, and another agent’s observation of Williams on July 21, 2023, I believe that the individual that identified himself as Williams, at the address of record for Williams, is AFO-419/#RiotingGolfer

The depictions of AFO-419 at the Capitol match Williams’s height, weight, and stature. Further, during a portion of his time at the Capitol, Williams removes his mask when suffering from the effects of chemical irritants. During this period, your affiant was able to compare a screenshot from an open-source video to a publicly available photograph of Williams. The two show the same person. *See Figure 7.*



Figure 10: On the left, a screengrab from a video recording depicting Williams on the West Plaza; on the right, a publicly available photograph of Williams found at: <https://www.nfl.com/players/antwione-williams>

In August 2024, agents reviewed credit card records from an account associated with Williams. The statement showed a purchase on January 6, 2021, at “Colonial Parking Lot #863.” According to Colonial’s website, this lot is located at the Rosslyn Metro Center.

Actions of Leander Antwione Williams on January 6, 2021

Williams was one of the first rioters to breach the restricted perimeter near Peace Monument. As seen in the photographs below, Williams pushed through a group of rioters that formed at an interior bike rack line and attacked and overcame the U.S. Capitol Police officers near this perimeter at the Pennsylvania walkway.



Figure 11: Open-source video depicting Williams move through the crowd toward the bike rack.



Figure 12: A publicly available photograph showing Williams (in red rounded rectangle) at the initial breach of the restricted perimeter.

Williams continued east and made his way to the West Plaza. Once there, Williams pressed with other rioters as members of the Capitol Police attempted to form impromptu lines to prevent entry.

The rioters pressed the officers back to the Southwest Stairs leading to the West Terrace before members of the Metropolitan Police Department (MPD) arrived and began pushing the crowd off the West Plaza. As MPD made progress, the officers would reenforce the line with metal bike racks. At approximately 1:13 p.m., Williams attempted to take a bike rack from an officer who was clearing the West Plaza.



Figure 13: Bodyworn camera footage of Williams grabbing and pulling bike rack

One minute later, at approximately 1:14 p.m., MPD continued to push the crowd away from the Capitol. Williams lunged at an officer and swatted at the officer's hand. The officer was deploying spray to prevent rioters from taking one of the bike racks. The event was captured on open-source video that depicted the chaos from above.

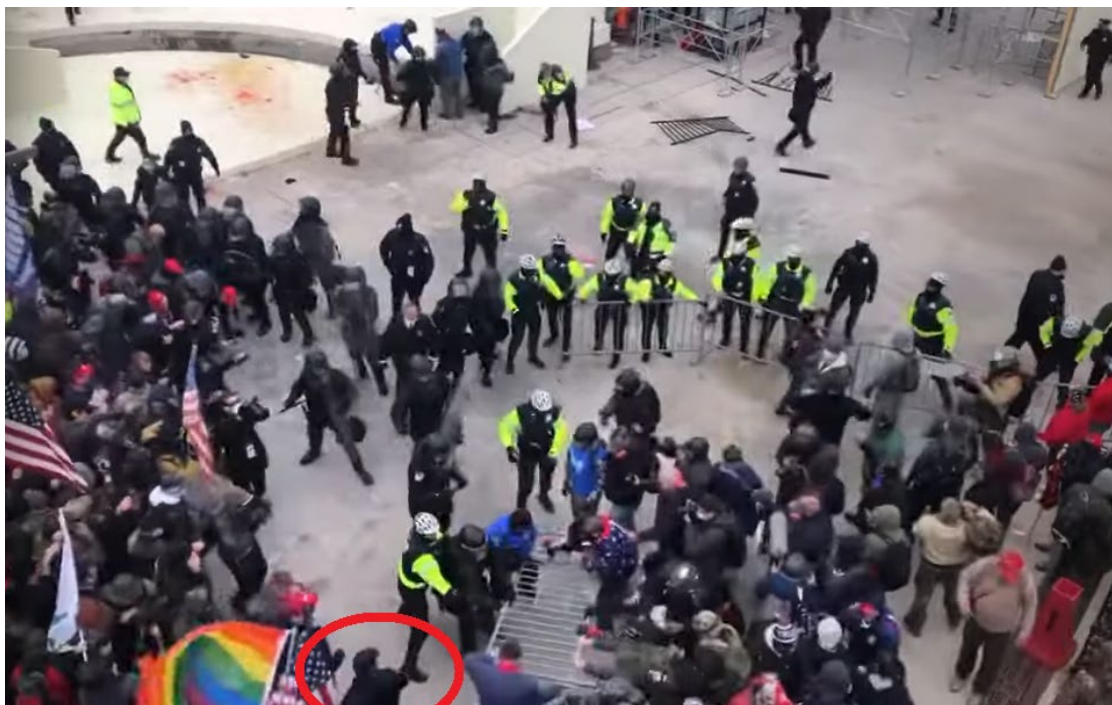


Figure 14: Williams circled in red, swats officers hand

As the violence between the rioters and the police officers escalated, Williams remained squarely with the rioters and often used the other rioters to hide his own actions. On one occasion, at approximately 1:38 p.m., as seen on body worn camera footage from MPD Officer I.D., Williams approached the bike rack barricades. About two minutes later, Williams moved forward and grabbed the barricade, this time with both hands, and pulled it backwards and away from the police line. MPD officers attempted to push Williams away, and in response, Williams jumped up and brought his hand and arm down forcefully on MPD Officer B.T.'s head. Other officers eventually pushed Williams off Officer B.T. and back down the steps.



Figure 15: Williams approaches line. Screenshot from MPD Officer O.A.'s BWC



Figure 16: Screenshots from Officer O.A.'s BWC; Top, Williams grabs the bike rack; Bottom, Williams jumps up with hand raised.



Figure 17: Screenshots from Officer I.D.'s BWC depicting Williams striking Officer B.T.

Williams again returned to the crowd. Then, at approximately 2:09 p.m., Williams pushed alongside fellow rioters against the bike rack line to push past officers. But the line of officers held, for the time being.



Figure 18: Open-source video depicting push against officers at approximately 2:09 p.m. Williams is circled in red.

Approximately 18 minutes later, Williams returned to the line of officers. At this point officers no longer had the benefit of the bike rack separating them from the rioters. Williams grabbed and pushed two officers, one from the United States Capitol Police and one from the Metropolitan Police.



Figure 19: Bodyworn camera footage depicting Williams struggle against officers

After rioters retook the West Plaza, Williams joined in chants of “U.S.A.!” and pumped his fists over his head. Williams took a few minutes to treat the effects of having been sprayed during that push, but eventually made his way to the Lower West Terrace.

Williams remained within the crowd on the Lower West Terrace. Williams can be observed near the Lower West Terrace entrance, the epicenter of some of the most chaos and violence against police officers on January 6, 2021, from approximately 3:10 p.m. to 4:45 p.m. Williams remained on the Capitol grounds until the evening.



Figure 20: Williams leaving Restricted Perimeter

Based on the foregoing, your affiant submits that there is probable cause to believe that Leander Antwione Williams violated 18 U.S.C. § 111(a)(1), which makes it a crime to forcibly assault, resist, oppose, impede, intimidate, or interfere with any person designated in 18 U.S.C. § 1114 as an officer or employee of the United States while engaged in or on account of the performance of official duties.

Your affiant submits there is probable cause to believe that Williams violated 18 U.S.C. § 231(a)(3), which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of 18 U.S.C. § 231, a federally protected function means any function, operation, or action carried out, under the laws of the United States, by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Secret Service’s protection of the Vice President.

Your affiant submits that there is probable cause to believe that Leander Antwione WILLIAMS violated 18 U.S.C. §§ 1752(a)(1), (2), and (4), which make 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; and (4) knowingly engage in any act of physical violence against any person or property in any restricted building or grounds; or attempts or conspires to do so. For purposes of 18 U.S.C. § 1752, 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 probable cause to believe that Leander Antwione WILLIAMS violated 40 U.S.C. § 5104(e)(2)(D), and (F), which make 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 (F) engage in an in the Grounds or 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 7th day of November 2024.

MOXILA A. UPADHYAYA
U.S. MAGISTRATE JUDGE