

UNITED STATES DISTRICT COURT
for the
District of Columbia

United States of America
v.
Sean David Watson
DOB: XXXXXX

Case: 1:21-mj-00392
Assigned To : Faruqui, Zia M.
Assign. Date : 4/22/2021
Description: COMPLAINT W/ ARREST WARRANT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of in the
in the District of Columbia, the defendant(s) violated:

Code Section

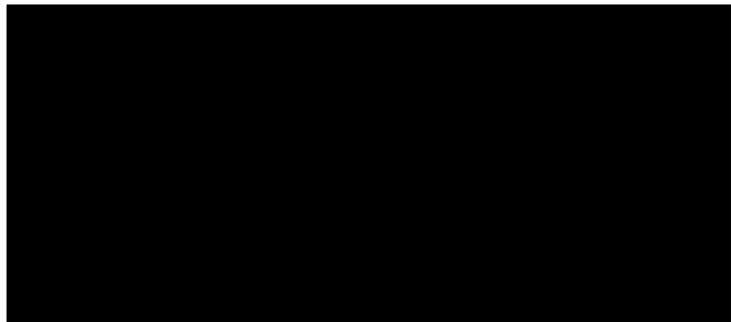
Offense Description

18 U.S.C. § 1752(a) - Knowingly Entering or Remaining in any Restricted Building or Grounds
Without Lawful Authority,
40 U.S.C. § 5104(e)(2) - Violent Entry and Disorderly Conduct on Capitol Grounds.

This criminal complaint is based on these facts:

See attached statement of facts.

Continued on the attached sheet.



Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone.

Date: 04/23/2021

Zia M. Faruqui Digitally signed by Zia M. Faruqui
Date: 2021.04.23 10:39:12 -04'00'

Judge's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Case No:
	:	
v.	:	
	:	VIOLATIONS:
	:	
SEAN DAVID WATSON,	:	18 U.S.C. § 1752(a)
	:	(Restricted Building or Grounds)
Defendant.	:	
	:	40 U.S.C. § 5104(e)(2)
	:	(Violent Entry or Disorderly Conduct)

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
AND ARREST WARRANT**

I, [REDACTED], Special Agent, Federal Bureau of Investigation (“FBI”), being first duly sworn, hereby depose and state as follows:

PURPOSE OF AFFIDAVIT

1. This Affidavit is submitted in support of a Criminal Complaint charging SEAN DAVID WATSON (hereinafter “WATSON”) with violations of 18 U.S.C. § 1752(a) and 40 U.S.C. § 5104(e)(2). I respectfully submit that this Affidavit establishes probable cause to believe that WATSON (1) did knowingly enter or remain in any restricted building or grounds without lawful authority, or did knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct, and (2) did willfully and knowingly 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 any deliberations of either House of Congress. Specifically, on or about January 6, 2021, WATSON traveled to Washington, D.C., and knowingly and willfully joined and encouraged a crowd of individuals who forcibly entered the U.S. Capitol and impeded, disrupted, and disturbed the orderly conduct of

business by the United States House of Representatives and the United States Senate.

BACKGROUND OF AFFIANT

1. I have been a Special Agent with the FBI since September 2017. I am currently assigned to the El Paso Division, Alpine Resident Agency of the FBI. Prior to becoming an FBI Agent, I worked as an information technology professional in the government and private sectors for approximately five years. As an FBI Agent, I have participated in investigations involving computer fraud, wire fraud and conspiracies to commit these crimes. In these investigations, I have been involved in the application for and execution of arrest and search warrants related to criminal offenses. In addition to my regular duties, I am currently tasked with investigating criminal activity concerning Sean Davis Watson in and around the Capitol grounds on January 6, 2021.

2. Unless otherwise stated, the information in this Affidavit is either personally known to me, has been provided to me by other individuals, or is based on a review of various documents, records, and reports. Because this Affidavit is submitted for the limited purpose of establishing probable cause to support an application for an arrest warrant, it does not contain every fact known by me or the United States. The dates listed in this Affidavit should be read as “on or about” dates.

PROBABLE CAUSE

3. The U.S. Capitol, which is located at First Street, SE, in Washington, D.C., 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 are allowed access inside the U.S. Capitol.

4. On January 6, 2021, the exterior plaza of the U.S. Capitol was closed to members of the public.

5. 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.

6. 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.

7. At approximately 2:00 p.m., certain individuals in the crowd forced their way through, up, and over the barricades, and officers of the U.S. Capitol Police, and the crowd advanced to the exterior façade of the building. The crowd was not lawfully authorized to enter or remain in the building and, prior to entering the building, no members of the crowd submitted to security screenings or weapons checks by U.S. Capitol Police Officers or other authorized security officials.

8. At such time, the certification proceedings 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, shortly after

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.

9. 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, all proceedings of the United States Congress, including the joint session, were effectively suspended until shortly after 8:00 p.m. the same day. In light of the dangerous circumstances caused by the unlawful entry to the U.S. Capitol, including the danger posed by individuals who had entered the U.S. Capitol without any security screening or weapons check, Congressional proceedings could not resume until after every unauthorized occupant had left the U.S. Capitol, and the building had been confirmed secured. The proceedings resumed at approximately 8:00 pm after the building had been secured. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the session resumed.

10. 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 SEAN DAVID WATSON

11. On January 13, 2021, a witness (hereafter WITNESS 1) notified the FBI that SEAN DAVID WATSON of Alpine, Texas, participated in the events of January 6, 2021 at the U.S. Capitol. WITNESS 1, WATSON'S coworker, claimed WATSON showed videos on his cellphone to others at work, claiming he (WATSON) made the videos while inside the U.S. Capitol building

on January 6, 2021. WITNESS 1 also stated that WATSON claimed to have been arrested on January 5, 2021 while in Washington, D.C. FBI confirmed WATSON's arrest by D.C. Metropolitan Police Department for crossing a police line during a protest on January 5, 2021.

12. On January 19, 2021, FBI interviewed WATSON. WATSON admitted to traveling to Washington D.C. to participate in political rallies but denied being at the U.S. Capitol building during his trip. On January 19, 2021, FBI also interviewed another person (hereafter WITNESS 2) who claimed WATSON had participated in the U.S. Capitol riots. WITNESS 2 claimed WATSON showed coworkers videos on his (WATSON's) cellphone of the U.S Capitol riots and claimed "I (Watson) fucked shit up."

13. On February 4, 2021, FBI again interviewed WATSON and seized his cellular telephone pursuant to a warrant. During this interview, WATSON admitted to participating in the January 6, 2021 U.S. Capitol riot. WATSON further stated that there was footage on his cellphone that he took inside the U.S. Capitol that he has since deleted.

14. On February 9, 2021, your Affiant compared WATSON's photo to images taken from January 6, 2021 U.S. Capitol riot footage. Based upon this comparison, your Affiant submits the following two images taken from Capitol riot holdings, show WATSON was inside the U.S. Capitol during the January 6, 2021 riot.



15. WATSON's participation in the January 6, 2021 U.S. Capitol riot is further supported by a review of WATSON's texts, photographs, and videos from his seized cellular telephone. For example, on January 7, 2021, WATSON texts, "I am fine. I was one of the people that helped storm the capitol building and smash out the windows . We made history today. Proudest day of my life!" Later that day, WATSON texts, "Got some videos and pics will share them when I get back." In addition to texts, the following images were discovered in WATSON's phone despite WATSON's attempt to delete them. These images (below) are of January 6, 2021 in or around the U.S. Capitol building.





CONCLUSIONS OF AFFIANT

16. Based on the foregoing, your affiant submits that there is probable cause to believe that WATSON violated:

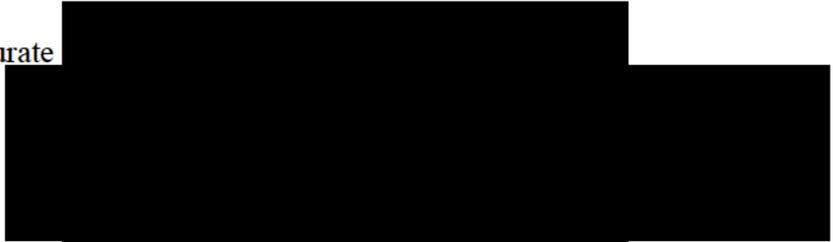
a. 18 U.S.C. § 1752(a), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; or (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive 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. 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 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; and

b. 40 U.S.C. § 5104(e)(2), which makes it a crime for an individual or group of individuals 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; or (G) parade, demonstrate, or picket in any of the Capitol Buildings.

17. As such, I respectfully request that the court issue an arrest warrant for Sean David Watson.

The statements above are true and accurate



Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 23rd day of April 2021.

Zia M.
Faruqui



Digitally signed by Zia
M. Faruqui
Date: 2021.04.23
10:37:39 -04'00'

ZIA M. FARUQUI
MAGISTRATE JUDGE
FOR THE DISTRICT OF COLUMBIA