

## STATEMENT OF FACTS

Your affiant, [REDACTED], is a Special Agent assigned to the FBI's Minneapolis Division, Rapid City Resident Agency. In my duties as a Special Agent, I investigate violations of federal law. 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 (USCP). 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.

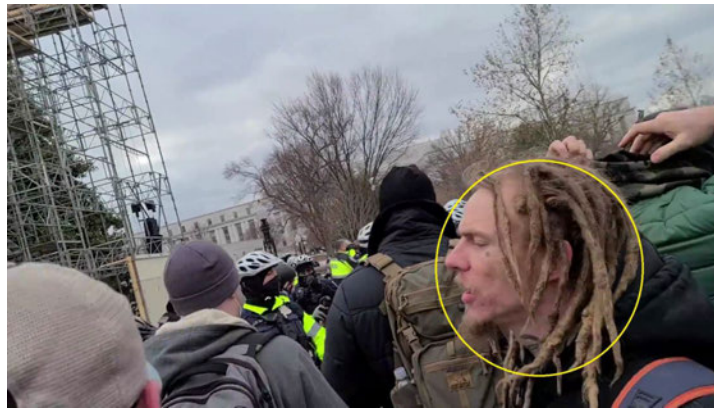
Shortly thereafter, at approximately 2:20 p.m., members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress 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 WILLIAM G. KNIGHT***

Over the course of this investigation, your affiant has reviewed publicly-available footage from the Washington Monument and U.S. Capitol, as well as USCP CCTV Metropolitan Police Department (MPD) bodyworn camera (BWC) footage from the U.S. Capitol on January 6. The following description is based on the review of that content.

WILLIAM GEORGE KNIGHT, of Rapid City, South Dakota, traveled to Washington, D.C., on January 6, 2021. KNIGHT has several distinctive tattoos, including one under his left eye, as seen in Image 1, and what appears to be the emblem of the Cadillac car company on his neck, as seen in Image 2.



*Image 1: KNIGHT on Capitol grounds. The tattoo under his left eye is visible.*



*Image 2: KNIGHT on Capitol grounds. The Cadillac logo tattoo on his neck is visible.*

In KNIGHT's driver's license photo, Image 3, the tattoos under his left eye and on his neck are visible.



*Image 3: KNIGHT's driver's license photo.*

According to records obtained through a search warrant served on Google, a mobile device associated with email address [REDACTED] was present at the U.S. Capitol on January 6, 2021. 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 email address [REDACTED] was located on the West Front of the Capitol. The earliest point reported by Google as being within the Capitol's restricted perimeter occurred at 12:58:51 PM and the latest occurred at 5:04:24 PM. Google provided 24 discrete device location points. For each, the entirety of the “maps display radius” fell within the Capitol's restricted perimeter.

Further, records provided by Google indicated this email address was associated with the username “[REDACTED].” Your affiant notes that “Kaddy,” more often spelled “Caddy,” is a shortening of the word “Cadillac.” KNIGHT has the logo of the Cadillac car company tattooed on his neck. Additionally, KNIGHT appears to use or have used a Facebook account with vanity name [REDACTED], another with vanity name [REDACTED], and a third with display name “[REDACTED].” The display name for the “[REDACTED]” account is “Will Knight” and for the “[REDACTED]” account is “William Knight.” Photos of KNIGHT and his Cadillac emblem neck tattoo are visible on all three accounts.

Google records also indicated the telephone number associated with this email address is [REDACTED]. FBI Special Agents spoke with KNIGHT on February 8, 2021, at this number. The terms of service IP associated with this Google account resolves to Rapid City, South Dakota.

*KNIGHT's Conduct on January 6, 2021*

On January 6, 2021, KNIGHT attended the “Stop the Steal” rally at the Washington Monument. At the rally, United States Park Police (USPP) took an individual into custody and brought him to the Washington Monument Visitor Screening Facility, at a time between 7:30 and 8:30 a.m. In response to the arrest, KNIGHT and a group of people followed the police to the Screening Facility. The crowd, including KNIGHT, chanted, “Let him go! Let him go!”

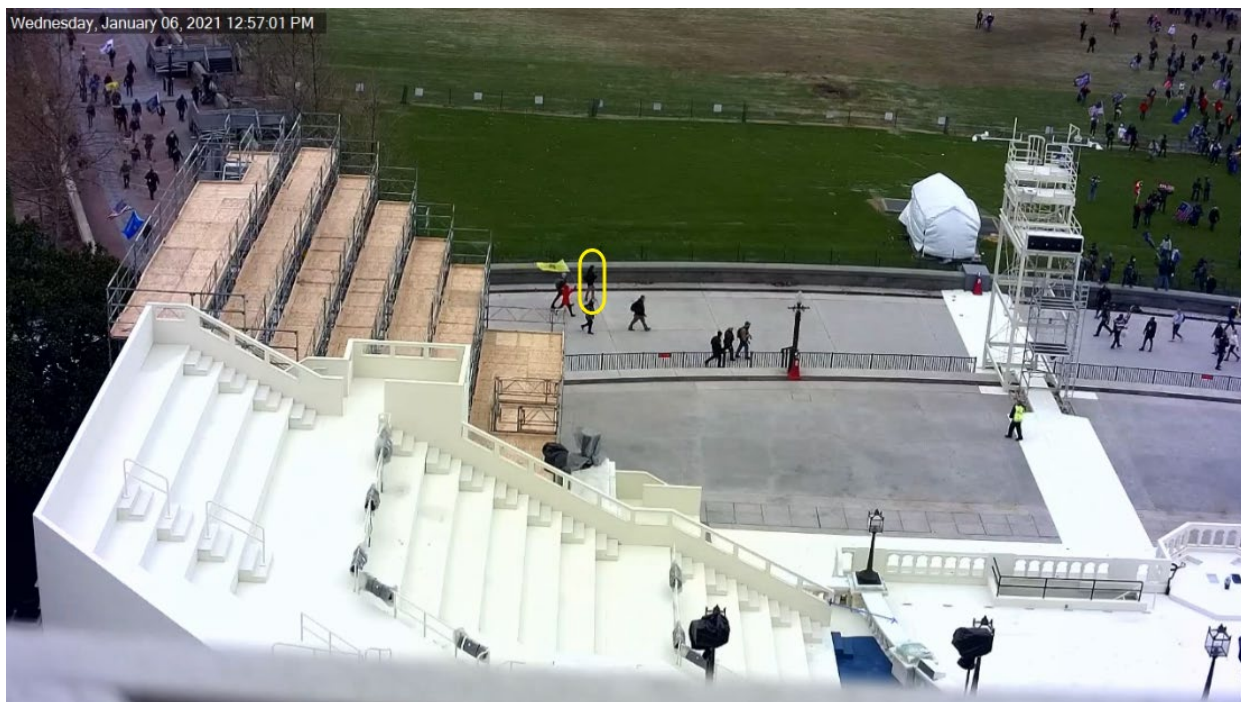
Multiple members of USPP were inside the Screening Facility, a glass structure, looking out to the crowd. KNIGHT aggressively approached the glass wall four times over the course of approximately seven minutes, each time pushing himself off the wall forcefully as a confrontational gesture toward the police. The second time he approached the glass wall, he put his middle fingers up to the glass, as captured in Image 4.



*Image 4: KNIGHT putting his middle fingers up to the police inside the Washington Monument Screening Center.*

After the third time he approached the glass wall and pushed himself off, he pointed menacingly at the police inside the Screening Center.

From the Washington Monument, KNIGHT walked along the National Mall toward the Capitol. KNIGHT entered Capitol grounds via the Maryland Avenue walkway. They were among the first rioters to breach the restricted perimeter and arrive at the West Plaza, at approximately 12:57 p.m., as captured in Image 5.



*Image 5: KNIGHT (yellow) arriving at the West Plaza of the Capitol at 12:57 p.m.*

Upon arrival at the West Plaza, KNIGHT gesticulated at the USCP officers behind the barrier, as captured in Image 6. KNIGHT's khaki pants, reddish backpack, and distinctive white and lime-green shoes are visible.



*Image 6: KNIGHT (yellow) gesticulating at USCP officers on the West Plaza.*

At approximately 1:06 p.m., as another rioter was fighting with an officer for control of the officer's police shield, KNIGHT advanced toward the police line and yelled at the officer, as captured in Image 7.



*Image 7: As the rioter in the orange shirt fought with a police officer for control of the officer's shield, KNIGHT (yellow) advanced toward the police line and yelled at the police.*

At approximately 1:13:18 p.m., KNIGHT repeatedly yelled, "Hold the line!" as Metropolitan Police Department (MPD) officers arrived to reinforce Capitol Police on the West Plaza.

At approximately 1:14:03 p.m., as MPD officers were attempting to set up a barrier using bike racks on the West Plaza, KNIGHT grabbed one of the bike rack barriers, as seen in Image 8. The police were able to hold onto the barrier, and KNIGHT fell backward, because he had pulled on the barrier so forcefully.



*Image 8: KNIGHT grabbing a bike rack barrier at 1:14:03 p.m.*

At 1:14:19 p.m., sixteen seconds later, KNIGHT then moved on to attempt to pull a second bike rack barrier away from a different police line nearby. After initially grabbing the second bike rack, he retreated momentarily. Five seconds later, he charged toward the police line, as seen in Image 9, and dove to grab the barrier, as seen in Image 10. MPD officers had to deploy chemical spray to stop KNIGHT.



*Image 9: KNIGHT charging toward the police line at 1:14:24 p.m.*



*Image 10: KNIGHT (yellow) grabbing a second bike rack barrier while MPD deployed chemical spray (orange) to stop him at 1:14:26 p.m.*

After engaging in this struggle with the police, KNIGHT yelled at and aggressively pointed at the police, as seen in Image 11, and then stuck both fists in the air in apparent defiance.



*Image 11: KNIGHT pointing and yelling at the police after grabbing a second bike rack barrier at 1:14:36 p.m.*

At approximately 1:23 p.m., KNIGHT jeered at the police line for several minutes, pointed at them aggressively multiple times, as captured in Image 12. KNIGHT yelled at the police, “We ain’t leaving! We ain’t going nowhere!” and “Here are the bitches. Here are the bitches.”





*Image 12: KNIGHT jeering and pointing at the police line.*

At approximately 1:40:30 p.m., KNIGHT and a large group of other rioters pushed a giant metal-framed sign toward the police line, as captured in Image 13. KNIGHT's distinctive white and lime green shoes, along with his khaki pants, are visible.



*Image 13: KNIGHT and other rioters pushing a large metal sign toward the police line.*

Just after ramming the sign into the police line, KNIGHT shoved MPD Sgt. J.C., as captured in Image 14 and Image 15.



*Image 14: KNIGHT shoving MPD Sgt. J.C.*



*Image 15: KNIGHT shoving MPD Sgt. J.C.*

Immediately after these acts, KNIGHT again grabbed a bike rack barrier and pulled it into the crowd, depriving the police of its use, as captured in Image 16.



*Image 16: KNIGHT and other rioters taking a bike rack barrier.*

KNIGHT remained at the vanguard of rioters confronting officers, as captured in Image 17. He chanted, "Stop the steal! Stop the steal!" with other rioters at approximately 1:44 p.m.



*Image 17: KNIGHT chanting "Stop the steal!"*

At approximately 2:08 p.m., KNIGHT was part of a group of rioters that pushed together against the police line, as captured in Image 18.



*Image 18: KNIGHT and other rioters pushing against the police line.*

The police line on the Lower West Plaza collapsed at approximately 2:30 p.m. KNIGHT and other rioters made their way up one level to the Lower West Terrace, as captured in Image 19.



*Image 19: KNIGHT at the Lower West Terrace.*

KNIGHT remained on the Lower West Terrace for at least two hours. At one point, another rioter stated, "If this is what makes you give up, you're not cut out for revolution." KNIGHT turned and nodded vigorously in agreement.



*Charges Supported by Probable Cause*

Based on the foregoing, your affiant submits there is probable cause to believe that KNIGHT 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 Section 231 of Title 18, 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 and his family and the Capitol Police's protection of the U.S. Capitol.

Your affiant submits that there is probable cause to believe that KNIGHT violated 18 U.S.C. § 111(a)(1) (two counts), which makes it a crime to forcibly assault, resist, oppose, impede, intimidate, or interfere with any person designated in section 1114 of Title 18 while engaged in or on account of the performance of official duties. Persons designated within section 1114 of Title 18 include federal officers such as USCP officers, and include any person assisting an officer or employee of the United States in the performance of their official duties.

Your affiant submits that there is probable cause to believe that KNIGHT 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 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; (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 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 KNIGHT 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; (F) engage in an act of physical violence in the Grounds or any of the Capitol Buildings.

  
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Special Agent   
FBI

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 15th day of May 2024.

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HON. MOXILA A. UPADHYAYA  
U.S. MAGISTRATE JUDGE