

STATEMENT OF FACTS

Your affiant, [REDACTED], is a Special Agent assigned to the FBI Salt Lake City Division, St. George Resident Agency. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, § 2510(7), and am empowered by law to conduct investigations of and to make arrests for federal criminal offenses. I have been so employed by the FBI since March 2018 and assigned to investigate criminal violations. As a special agent with the FBI, I have received training, participated, and have conducted and led multiple investigations, search warrants, and arrest warrants related to the commission of federal crimes. 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.

BACKGROUND

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.

DEFENDANTS' ACTIONS ON JANUARY 6TH

During the course of the Federal Bureau of Investigation (FBI)'s investigation into the events of January 6, 2021, the FBI received a tip that one of the rioters was CHRISTOPHER JORDAN. During subsequent investigation, an individual who has interacted closely with CHRISTOPHER JORDAN several times was interviewed by the FBI and confirmed that CHRISTOPHER JORDAN was the individual identified in pictures and bodyworn camera footage (from which still images are included below) from the Capitol on January 6, 2021. FBI personnel also observed CHRISTOPHER JORDAN and confirmed that he was the individual in the images. From my review of the body worn camera footage that is the source of the images included below and my own experience with this investigation, I am able to recognize that Image 7 below shows CHRISTOPHER JORDAN at a location within the restricted area that included the Capitol and its grounds on January 6, 2021.

Pursuant to a search warrant served on Google on January 6, 2021, a google e-mail account was geolocated on the grounds of the Capitol that was associated with three phone numbers. Investigation indicated that one of those phone numbers was associated with an individual who lives at the same address as EARL JORDAN, the brother of CHRISTOPHER JORDAN. The FBI received a tip that an individual on the Capitol grounds near CHRISTOPHER JORDAN was EARL JORDAN. FBI personnel subsequently performed surveillance of EARL JORDAN and positively identified EARL JORDAN as the individual seen in images from the Capitol on January 6, 2021, including Image 8, below. From my review of the body worn camera footage that is the source of the images included below and my own experience with this investigation, I am able to recognize that Image 3 below shows EARL JORDAN at a location within the restricted area that included the Capitol and its grounds on January 6, 2021.

On January 6, 2021, at approximately 2:04 p.m., EARL JORDAN and CHRISTOPHER JORDAN were present on Capitol grounds on the West Front near the north scaffolding, as seen on body worn camera of the Metropolitan Police Department. EARL JORDAN wore a dark bandana with light lining on his head, a dark gray fleece jacket with an orange logo on the front, and denim jeans. *See* Images 1, 2, and 3 (below). CHRIS JORDAN wore a navy blue skull cap with the word "TRUMP" written across the bottom band in white letters, a blue fleece jacket, denim jeans, brown shoes, and safety glasses, and carried a dark backpack on his back. *See* Images 3 and 5 (below).



Image 1: Still from body-worn camera of Officer 2 showing Officer 1 (circled in blue), EARL JORDAN (circled in yellow) and CHRISTOPHER JORDAN (circled in green, facing away).

At this time, Metropolitan Police Department (MPD) Unit 42, responding to calls for help from the United States Capitol Police (USCP), pushed through the crowd of rioters gathered on the Lower West Terrace in an attempt to join other officers of the USCP and the MPD behind a police line on the West Front of the Capitol. While officers of Unit 42 made their way past the north scaffolding, Officer 1 brushed past EARL JORDAN. In response, EARL JORDAN threw his elbow at Officer 1, knocking Officer 1 off balance. *See Image 2, below.*



Image 2: Still from body-worn camera of Officer 3 showing EARL JORDAN (circled in yellow) elbowing Officer 1 (circled in blue).

As Officers 2 and 3 tried to move EARL JORDAN out of the way of Unit 42's advance to the police line, Officer 1 turned toward the JORDAN brothers. CHRISTOPHER JORDAN then lunged towards Officer 1. *See Image 3, below.*



Image 3: Still from body-worn camera of Officer 1 showing CHRISTOPHER JORDAN (circled in green) lunging toward Officer 1 with EARL JORDAN (circled in yellow) being moved by other officers.

Officer 1 instructed the JORDAN brothers to “get back.” However, EARL JORDAN swiped his hand at Officer 1’s face. *See Image 4, below.*



Image 4: Still from body-worn camera of Officer 1 showing EARL JORDAN (circled in yellow) reaching his arm toward Officer 1.

Officer 2 helped Officer 1 break away from EARL JORDAN, but EARL JORDAN lunged again at Officer 1, grabbing at Officer 1's throat and shoving at Officer 1. At the same time, CHRISTOPHER JORDAN turned and began shoving at Officer 4. See Images 5, 6, and 7, below.



Image 5: Still from body-worn camera of Officer 2 showing EARL JORDAN (circled in yellow) grabbing at Officer 1, and CHRISTOPHER JORDAN (circled in green).



Image 6: Still from body-worn camera of Officer 1 showing EARL JORDAN (circled in yellow) shoving at Officer 1 and CHRISTOPHER JORDAN (circled in green) beyond.



Image 7: Still from body-worn camera of Officer 2 showing EARL JORDAN (circled in yellow) shoving at Officer 1 and CHRISTOPHER JORDAN (circled in green) grappling with Officer 4.

EARL JORDAN and Officer 1 broke apart, allowing Officer 1 to make his way to the police line along the Lower West Terrace, where he tried to usher the rest of Unit 42 to safety. However, the JORDAN brothers again prevented the officers of Unit 42 from reaching the police line. CHRISTOPHER JORDAN continued grappling with several officers, grabbing onto Officer 4's police baton and refusing to let go. EARL JORDAN pushed into the fray, shoving at Officer 4's shoulder and using his body to block officers who were trying to make CHRISTOPHER JORDAN let go of Officer 4's baton. *See Image 8, 9, and 10.*



Image 8: Still from body-worn camera of Officer 2 showing EARL JORDAN (circled in yellow) blocking officers with his body and CHRISTOPHER JORDAN (circled in green) grasping Officer 4's baton.



Image 9: Still from body-worn camera of Officer 5 showing EARL JORDAN (circled in yellow) shoving Officer 4 (circled in blue) at the shoulder and CHRISTOPHER JORDAN (circled in green) yanking at Officer 4's baton.



Image 10: Still from body-worn camera of Officer 5 showing EARL JORDAN (circled in yellow) shoving officers and CHRISTOPHER JORDAN (circled in green) yanking at Officer 4's baton.

Eventually, another rioter pulled on CHRISTOPHER JORDAN's backpack, forcing him to let go of Officer 4's baton. See Image 11, below. The JORDAN brothers disappeared into the

crowd and the officers of Unit 42 were finally able to find safety behind the police line on the Lower West Terrace.



Image 11: Still from body-worn camera of Officer 5 showing EARL JORDAN (circled in yellow) shoving officers and CHRISTOPHER JORDAN (circled in green) yanking at Officer 4's baton while a rioter (circled in orange) pulls on CHRISTOPHER JORDAN's backpack.

Later on January 6, 2021, CHRISTOPHER JORDAN and EARL JORDAN were filmed in open source video outside the North Door to the Capitol Building as police struggled to keep the door closed to prevent rioters from entering. See Image 12, below.



Image 12: Still from open source video (<https://archive.org/details/iX4ognreszbhLz9aj>) showing CHRISTOPHER JORDAN (circled in green) and EARL JORDAN (circled in yellow) outside the North Door of the Capitol building.

While outside the North Door, EARL JORDAN picked up a piece of metal fencing and threw it at the North Door as police officers attempted to close the door. *See Image 13, below.*



Image 13: Still from open source video (<https://www.youtube.com/watch?v=9TshRdxXi9c&t=306s>) showing EARL JORDAN (circled in yellow) lifting one end of metal fencing to throw towards the closing North Door.

CHRISTOPHER JORDAN and EARL JORDAN remained on Capitol grounds until the evening of January 6, 2021 when police were finally successful in clearing the grounds of rioters. See Image 14, below.



Image 14: still from open source video (https://www.youtube.com/watch?v=WmV_7W4em5A&t=750s) showing CHRISTOPHER

JORDAN (circled in green) and EARL JORDAN (circled in yellow) in crowd being cleared off the Capitol grounds.

Based on the foregoing, your affiant submits that there is probable cause to believe that EARL JORDAN and CHRISTOPHER JORDAN 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. 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 EARL JORDAN and CHRISTOPHER JORDAN violated 40 U.S.C. § 5104(e)(2)(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.

Your affiant submits there is probable cause to believe that EARL JORDAN and CHRISTOPHER JORDAN 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 EARL JORDAN and CHRISTOPHER JORDAN 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 section 1114 of Title 18 while engaged in or on account of the performance of official duties, where such acts involve physical contact with the victim or the intent to commit another felony. 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.

[REDACTED]
[REDACTED]
FBI

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 1st day of October 2024.

ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE