

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

UNITED STATES OF AMERICA	:	Case No: _____
	:	
v.	:	18 U.S.C. §§ 1752(a)(1), 1752(a)(2)
	:	(Unlawful Entry on Restricted Grounds)
SAMUEL J. FISHER,	:	
	:	40 U.S.C. § 5104(e)(2)(D)
a/k/a “Brad Holiday”,	:	(Disorderly Conduct on Restricted Grounds)
	:	
	:	
Defendant.	:	
	:	

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

I, [REDACTED], 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 SAMUEL FISHER (“FISHER”), a/k/a “Brad Holiday,” with violations of 18 U.S.C. §§ 1752(a)(1) and 1752(a)(2) (Unlawful Entry on Restricted Grounds) and 40 U.S.C. § 5104(e)(2)(D) (Disorderly Conduct on Restricted Grounds).

2. I respectfully submit that this Affidavit establishes probable cause to believe that FISHER (1) did knowingly enter or remain in any restricted building or grounds without lawful authority, and did 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, impeded or disrupted the orderly conduct of Government business or official functions, in violation of 18 U.S.C. §§ 1752(a)(1) and 1752(a)(2); and (2) did engage in disorderly or disruptive conduct,

at any place in the U.S. Capitol Grounds or in any of the U.S. 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, in violation of 40 U.S.C. § 5104(e)(2)(D).

BACKGROUND OF AFFIANT

3. I am a Special Agent with the FBI. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request search warrants. I have been employed by the FBI since in or about 2014, and have served as a Special Agent with the FBI for approximately 10 months. I am currently assigned to the FBI’s Threat Response Squad. I have participated in investigations into domestic terrorism, and the execution of search warrants for premises, including those that involved the seizure of electronic evidence.

4. 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.

STATEMENT OF FACTS SUPPORTING PROBABLE CAUSE

Assault on the U.S. Capitol on January 6, 2021

5. 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.

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

7. 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.

8. As the proceedings continued in both the House and the Senate, and with Vice President 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.

9. 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.

10. 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.

11. 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 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.

12. 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.

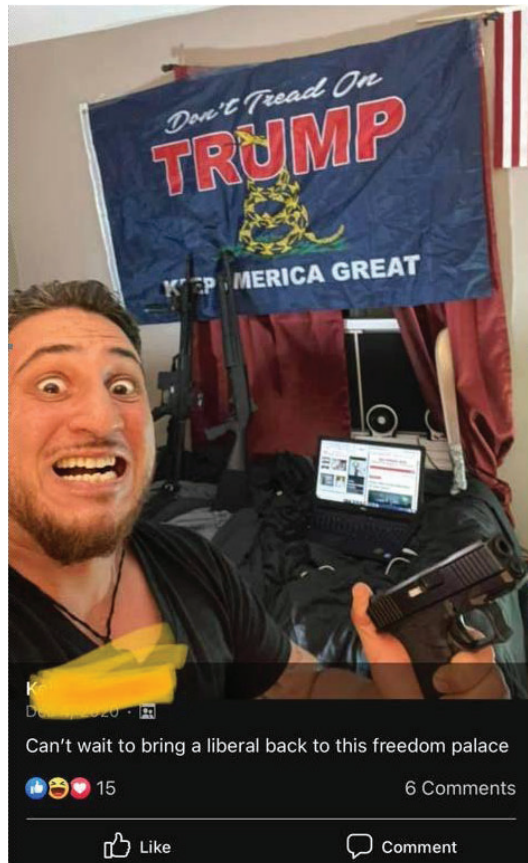
SAMUEL FISHER a/k/a "Brad Holiday"

13. Within the past approximately one week, an individual ("Individual-1") contacted the FBI and provided information about certain photographs that Samuel FISHER, a/k/a "Brad Holiday," the Target Subject, had recently posted to at least one Facebook account associated with FISHER. Individual-1 stated, in sum and substance, that the photographs appeared to depict FISHER in the vicinity of the U.S. Capitol on or about January 6, 2021, during the events described above. The photographs also appeared to depict FISHER holding at least one firearm. Individual-1 provided the FBI with screenshots of certain of the photographs in question, which I have reviewed.

14. In one of the photographs ("Photograph-1"), an individual subsequently identified as FISHER, as described below, is depicted in a large crowd in the vicinity of the U.S. Capitol. Based on my conversations with a U.S. Capitol Police Officer, who also reviewed Photograph-1, I believe that, when Photograph-1 was taken, FISHER was standing on the steps of the U.S. Capitol, unlawfully within a restricted area. In another of the photographs ("Photograph-2"), FISHER is depicted holding what appears to be a firearm in front of a flag that states, in sum and substance, "Don't Tread on Trump, Keep America Great." The caption of Photograph-2 states, in sum and substance, "Can't wait to bring a liberal back to this freedom palace." Screenshots of Photograph-1 and Photograph-2 appear below.



Photograph 1



Photograph 2

15. I have reviewed Department of Motor Vehicles records associated with FISHER (the “DMV Records”), including a photograph of FISHER (the “DMV Photograph”). Based on my comparison of the DMV Photograph with Photograph-1 and Photograph-2, and my training and experience, I believe that all three photographs depict the same individual, and that that individual is FISHER.

Social Media Evidence of Offenses by FISHER

16. I have reviewed the publicly accessible portion of the Facebook accounts “Holiday Joseph Bradly,” user identification number (“UID”) 100010342990492 (“Facebook Account-1”), and “LuxLife Dating Coach,” UID 317782599170387 (“Facebook Account-2”) (collectively, the “Facebook Accounts”) which contain numerous photographs of a particular individual. Based on my comparison of the photographs that appear on the Facebook Accounts with a DMV Photograph, Photograph-1, and Photograph-2, I believe that all of the photographs depict the same individual, and that that individual is FISHER. I further believe that FISHER is the user of the Facebook Accounts. Likewise, I have determined that FISHER is the person who appears in videos and publishes content on a particular website, bradholiday.com, based on the content of that site and my comparison of the images of FISHER that appear there with the above-referenced photographs.

17. Based on my review of records associated with Facebook Account-1, which law enforcement obtained from Facebook, I have learned that, in various posts and direct messages, FISHER communicated, in sum and substance, that, before on or about January 6, 2021, FISHER traveled to Washington, D.C. and thereafter participated in the events at the U.S. Capitol that did impede, disrupt, and disturb the orderly conduct of Government business or official functions, that is, the certification proceedings underway inside the U.S. Capitol.; and that while FISHER was in Washington, D.C., he was in possession of multiple firearms and a bulletproof vest. I have further

learned that the IP addresses associated with certain of the posts indicate that FISHER made them while he was in or around Washington, D.C. on or about January 6, 2021.

18. Based on my review of the records associated with the Facebook Accounts, it is evident that, when FISHER did enter and remain in the restricted grounds of the U.S. Capitol without lawful authority, he did so with intent to impede, disrupt, and disturb the orderly conduct of the certification proceedings underway inside the U.S. Capitol. Specifically, that intent is demonstrated by the following statements and posts attributable to FISHER on the Facebook Accounts:

- December 3, 2020: “We must stand up to these people and take our world back” / “It’s time to bring the pain upon them”
- December 30, 2020: “im headed to dc on the 5th”
- December 31, 2020: “they cant arrest us all man” / “gotta stand up” / “I think there gonna be over a million patriots in DC” / “I’m going there” / “on the 6th”
- December 31, 2020: “just march on DC on the 6th” / “bring ur guns sr” / “I’ll be there man” / “if you wanna roll with” / “you have firearms?” / “i’d exercise my 2A legal rights there”
- January 3, 2021, in response to a request to take video on January 6th when “Real Patriots will fall upon the capital in protest”: “Yea dude” / “I’m there” / “Just booked my Room”
- January 5-6, 2021, in response to question “You in DC?”: “Yea” “I’ve been here for a day” “I think it’s game over for Trump. The swamp and pedophiles in Hollywood are immortal” / “If millions of patriots don’t show up with guns” / “It could be over” / “I’m in some nasty air b n b in the Hood” / “Haven’t slept in 2 days basically” / “Feel like shit and tmo they’re gonna steal the election then I have to drive 10 Hours back home”
- January 6, 2021, in response to question “How long you’re there till?: “tomorrow” “unless i need to be here for longer” “anxiety is high” “haven’t realaly slept in like 2-3 days”
- January 6, 2021: “Gotta make a stand man” “Not gonna be intimidated” (question: “DC open carry state?”) “No” “Not at all” (response: “I would stay heavy though”) “You know it”

Following the last January 6, 2021, post listed above, FISHER sent the following photograph of firearms:



Photograph 3

On the same day, he wrote: “I’m Going To the parking garage super early” “Leaving shit in there maybe except pistol” “And if it kicks off I got a Vest and My Rifle.”

19. In a message posted on bradholiday.com on January 6, 2021, FISHER appears to describe the January 5, 2021, “Stop the Steal” rally in Washington, D.C., and describes his intentions for the following day, January 6, 2021:

I am writing this from my Air B n B in Washington D.C. . . . Tomorrow, Trump and We The People will be betrayed again by every so called representative who said they'd fight for us. Ted Cruz, Dan Crenshaw, all of these supposed hardcore constitutionalist republicans... all are compromised. They will allow the steal to go on There's really three outcomes I foresee happening.

- Trump has an Ace card up his sleeve. He plays it. The Deep State is arrested and hanged on the White House lawn for the High Treason
- Trump fails, Biden gets installed... Patriots are ineffective and we live under the rule of the elite pedophiles and chinese communist party
- Trump fails, Biden gets installed... Patriots show up in the millions with guns. They execute all treasonous members of government and rebuild.

Each of these, I believe are equally likely. At the Stop The Steal rally today... I was disappointed at the lack of numbers of patriots If there are over 1 million patriots that show up tomorrow for trumps 11AM speech. At 1 when congress certifies the election... Trump just needs to fire the bat signal... deputize patriots... and then the pain comes. 1 Million Pissed off men with guns... bad idea. We aren't looking to fight or hurt anyone... but the odds that this is going to be solved any other way... is next to nothing

<https://bradholiday.com/?p=2938> (formatting altered)

20. On January 7, 2021, on Facebook Account-1, Fisher was asked, "Did you get to the frontlines?" FISHER responses included the following: "i was there . . . it was awesome" / "it was dangerous and violent" / "people died . . . but it was fucking great if you ask me . . . i got tear gassed and pepper sprayed" / "seeing cops literally run . . . was the coolest thing ive ever seen in my life" / "cant divulge too much here" / "but fuck the dc police" / "in all seriousness and get ready . . . get in shape and see if you can find someone that knows medical/veteran w/ combat experience"

CONCLUSIONS OF AFFIANT

21. Based on the foregoing, your Affiant submits that there is probable cause to believe that FISHER violated 18 U.S.C. § 1752(a)(1) and 1752(a)(2) (Unlawful Entry on Restricted Grounds) and 40 U.S.C. § 5104(e)(2)(D) (Disorderly Conduct on Restricted Grounds).

As such, I respectfully request that the court issue an arrest warrant for FISHER. The statements above are true and accurate to the best of my knowledge and belief.



FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 20th day of January, 2021.

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ZIA M. FARUQUI

U.S. MAGISTRATE JUDGE