

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

ROBERT SANFORD,

Defendant.

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Case No.: 21-CR-86

18 U.S.C. § 111(a)(1) & (b)

STATEMENT OF OFFENSE

Pursuant to Fed. R. Crim. P. 11, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Robert Sanford, with the concurrence of his attorney, agree and stipulate to the below factual basis for the defendant's guilty plea—that is, if this case were to proceed to trial, the parties stipulate that the United States could prove the below facts beyond a reasonable doubt:

The Attack at the U.S. Capitol on January 6, 2021

1. The U.S. Capitol, which is located at First Street, SE, in Washington, D.C., is secured twenty-four hours a day by U.S. Capitol Police (USCP). Restrictions around the Capitol include permanent and temporary security barriers and posts manned by USCP. Only authorized people with appropriate identification are allowed access inside the Capitol.

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

3. On January 6, 2021, a joint session of the United States Congress convened at the 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 Capitol to certify the vote count of the Electoral College of the 2020

Presidential Election, which had taken place on Tuesday, November 3, 2020. The joint session began at approximately 1:00 PM. Shortly thereafter, by approximately 1:30 PM, 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.

4. 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 Capitol. Temporary and permanent barricades, as noted above, were in place around the exterior of the Capitol, and USCP officers were present and attempting to keep the crowd away from the Capitol and the proceedings underway inside.

5. At approximately 2:00 PM, certain individuals in the crowd forced their way through, up, and over the barricades. Officers of the USCP were forced to retreat 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 as required by USCP officers or other authorized security officials.

6. At such time, the certification proceedings were still underway, and the exterior doors and windows of the Capitol were locked or otherwise secured. Members of the USCP attempted to maintain order and keep the crowd from entering the Capitol; however, shortly after 2:00 PM, individuals in the crowd forced entry into the Capitol, including by breaking windows and by assaulting members of law enforcement, as others in the crowd encouraged and assisted those acts. The riot resulted in substantial damage to the Capitol, requiring the expenditure of more than \$1.4 million dollars for repairs.

7. Shortly thereafter, at approximately 2:20 PM, members of the House of Representatives and of the 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 PM on January 6, 2021. In light of the dangerous circumstances caused by the unlawful entry to the Capitol—including the danger posed by individuals who had entered the Capitol without any security screening or weapons check—Congressional proceedings could not resume until after every unauthorized occupant had been removed from or left the Capitol, and USCP confirmed that the building was secured. The proceedings resumed at approximately 8:00 PM after the building had been secured. Vice President Pence remained in the Capitol from the time he was evacuated from the Senate Chamber until the session resumed.

Robert Sanford's Participation in the January 6, 2021, Capitol Riot

8. The defendant, Robert Sanford, lives in Chester, Pennsylvania. On January 6, 2021, defendant traveled from Chester, Pennsylvania to Washington, D.C., via bus. The purpose of the defendant's trip to Washington, D.C., was to protest Congress' certification of the Electoral College.

9. On January 6, defendant attended President Trump's rally at the Ellipse and subsequently walked down to the United States Capitol grounds.

10. At about 2:30 pm, defendant was part of a group that gathered on the Lower West Terrace. While there, defendant threw a fire extinguisher at a group of United States Capitol Police Officers, striking three officers in the head. The defendant also threw a traffic cone in the direction of officers. The defendant screamed in the direction of the officers that they were "traitors."

11. On January 12, 2021, the defendant was interviewed by law enforcement and stated that he was on the Capitol grounds during the Capitol breach and identified himself in footage taken from the Capitol breach.

Elements of the Offense

12. Robert Sanford knowingly and voluntarily admits to all the elements of Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon. Specifically, defendant admits that:

- The defendant forcibly assaulted, resisted, opposed, impeded, intimidated, or interfered with any person designated in 18 U.S.C. § 1114 while engaged in or on account of the performance of their official duties. Specifically, the defendant admits that he struck United States Capitol Police Officers with a fire extinguisher. The defendant further admits that he knew at that time of the assault that the officers were engaged in the performance of their official duties and that he assaulted the officers on account of their performance of their official duties.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By:

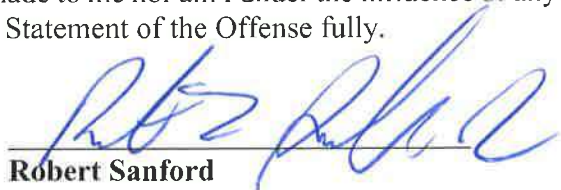


Janani Iyengar
Assistant United States Attorney
NY Bar No. 5225990

DEFENDANT'S ACKNOWLEDGMENT

I, Robert Sanford, have read this Statement of the Offense and have discussed it with my attorney. I fully understand this Statement of the Offense. I agree and acknowledge by my signature that this Statement of the Offense is true and accurate. I do this voluntarily and of my own free will. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Statement of the Offense fully.


Date: 4/12/22


Robert Sanford
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this Statement of the Offense and have reviewed it with my client fully. I concur in my client's desire to adopt this Statement of the Offense as true and accurate.

Date: 4/12/22


Andrew Stewart
Attorney for Defendant

CO 526 Rev. 5/2018


**UNITED STATES DISTRICT AND BANKRUPTCY COURTS
FOR THE DISTRICT OF COLUMBIA**


UNITED STATES OF AMERICA)
)
 vs.)
)
 ROBERT SANFORD)
)
)

Criminal Case No.: 21-86 (PLF)

WAIVER OF TRIAL BY JURY


With the consent of the United States Attorney and the approval of the Court, the defendant waives his right to trial by jury.



Defendant


Counsel for Defendant

I consent:



Assistant United States attorney

Approved:



PAUL L. FRIEDMAN

Date: 9/23/2022

PAUL L. FRIEDMAN

United States District Judge