

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

UNITED STATES OF AMERICA	:	
	:	Case No. 21-CR-233 (CJN)
v.	:	
	:	18 U.S.C. § 231(a)(3)
WILLIAM ROBERT NORWOOD, III,	:	(Civil Disorder)
	:	
Defendant.	:	

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, William Robert Norwood, III, with the concurrence of the defendant's 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. The grounds around the Capitol were posted and cordoned off, and the entire area as well as the Capitol building itself were restricted due to the fact that the Vice President and the immediate family of the Vice President, among others, would be visiting the Capitol complex that day.

3. On January 6, 2021, a joint session of the United States Congress convened at the Capitol. 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. By shortly after 1:00 PM, the situation at the Capitol had become a civil disorder as that term is used in Title 18, United States Code, Section 231, and throughout the rest of the afternoon the civil disorder obstructed the Secret Service's ability to perform the federally protected function of protecting Vice President Pence.

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. Officers with the D.C. Metropolitan Police Department were called to assist officers of the USCP who were then engaged in the performance of their official duties. 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 \$2.9 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.

William Robert Norwood III's Participation in the January 6, 2021, Capitol Riot

8. William Robert Norwood III drove from South Carolina to Washington D.C. to attend then-President Trump's speech on January 6, 2021. After the rally, Norwood walked to the U.S. Capitol Building and entered into its restricted perimeter. Norwood ascended the partially covered stairs on the northwest side of the U.S. Capitol Building, and ultimately entered the building through the northwest Senate Wing door at approximately 2:23 p.m.

9. After entering the Senate Wing door, Norwood walked south and briefly entered an office across the hall from the Old Supreme Court Chamber. Norwood recorded a video of himself entering this office. In this video, Norwood can be heard saying, "Well we in this bitch now. What

now? This is our house,” upon entering the office, and “Where you at Nancy?” upon leaving the office.

10. After leaving the office, Norwood walked through the Crypt and upstairs to the Rotunda. From there, Norwood was part of a crowd of rioters making their way through Speaker Nancy Pelosi’s office suite. As Norwood was walking through the Speaker’s wing, he took a paper coaster with the words “U.S. Congress” and the Congressional seal printed on it, which another rioter had thrown to him from a desk outside of one of Speaker Pelosi’s offices.

11. Norwood then walked to the balcony outside the Speaker’s chamber. There, he recorded two videos of the crowd gathered outside on the west front of the U.S. Capitol Building. In one of these videos, Norwood can be heard shouting, “It’s our house bitches.” In the second video, Norwood can be heard shouting “The [inaudible] house! Go home police! Bye, you bitches.”

12. After leaving the balcony, Norwood entered one of Speaker Pelosi’s offices for approximately 25 seconds. He then walked back through the Speaker’s wing.

13. After leaving the Speaker’s wing, Norwood walked back through the Rotunda and to the East Rotunda doors. The East Rotunda doors were being guarded from the inside by at least three U.S. Capitol Police officers, including one officer clad in black riot gear. The officers were performing their official duties and stood between rioters and the doors in order to prevent the doors from being opened because there were additional rioters visible just outside those doors. The officers told the rioters inside of the doors that they would not allow the doors to be opened.

14. Norwood went to the front of the line of rioters gathered at the East Rotunda doors and began banging on the doors in an attempt to open them. Norwood told officers to open the doors and the officers repeatedly told Norwood and the others that the doors would not be opened. Norwood knew that the officers were attempting to keep the doors closed yet he continued to push

on the doors with his arm. At approximately 2:38 p.m., Norwood, together with the rioters behind him, eventually pushed open the doors, which allowed hundreds of rioters to enter the U.S. Capitol Building from the outside.

15. At the time Norwood and the others forced the doors open he and the other rioters were involved in a civil disorder. This civil disorder affected a federally protected function in that a joint session of Congress to certify the presidential election had to be halted and could not resume until officers removed all rioters from the Capitol building and its grounds. The civil disorder also affected interstate commerce because the mayor of the District of Columbia had to institute a curfew at 6:00 p.m. that day, which resulted in the closure of commercial businesses resulting in substantially reduced sales.

16. Following the breach of the East Rotunda doors, Norwood briefly stepped out of the U.S. Capitol Building. When he came back inside seconds later, Norwood joined several other rioters in forming a protective circle around the officer clad in black riot gear. Norwood then offered the officer clad in black riot gear a blue Gatorade from his pocket.

17. After participating in the breach of the East Rotunda door, Norwood continued wandering around the Capitol Building. He recorded a one-minute video inside the Rotunda that showed a line of Metropolitan Police Department officers wearing yellow jackets. During the video, Norwood can be heard saying, "Oh these assholes, trying to push us out. . . . Should we take our house back? Our house. Y'all are a bunch of pussies. It's about to go down bro." Norwood then turns the camera on himself and says, "It's about to go down. Cause I'm gonna go [unintelligible] guns or their asps and attack these motherfuckers later. No fucking around, no no."

18. Norwood eventually left the U.S. Capitol Building through the East Rotunda door at approximately 2:59 p.m.

19. After exiting from the U.S. Capitol Building, Norwood took a U.S. Capitol Police helmet and plate carrier from a bin outside the building. The helmet and plate carrier are valued at approximately \$578.83.

20. During a non-custodial interview with FBI agents in January 2021, Norwood lied to agents by claiming to have left the helmet and plate carrier in a cabinet in a hotel room in Washington, D.C. In fact, however, Norwood took the helmet and plate carrier back with him to South Carolina and hid them in a portable trailer that he parked on a friend's property.

21. During his post-arrest interview, Norwood admitted that he and his then wife with the initials D.O. each brought a tactical vest, and they also brought mace and a small knife to Washington, D.C., though he did not bring these items into the Capitol.

Elements of the Offense

22. The parties agree that 18 U.S.C. § 231(a)(3) (Civil Disorder) requires the following elements:

- a. First, the defendant knowingly committed or attempted to commit an act with the intended purpose of obstructing, impeding, or interfering with one or more law enforcement officers;
- b. Second, at the time of the defendant's act, the law enforcement officers were engaged in the lawful performance of their official duties incident to and during a civil disorder; and
- c. Third, the civil disorder in any way or degree obstructed, delayed, or adversely affected commerce or the movement of any article or commodity in commerce, or the conduct or performance of any federally protected function.

Defendant's Acknowledgments

23. The defendant knowingly and voluntarily admits to all the elements as set forth above. Specifically, the defendant knew at the time he entered the U.S. Capitol Building that he

did not have permission to enter the building. Further, the defendant admits that, while inside the U.S. Capitol Building, he obstructed, impeded, and interfered with law enforcement officers, that is, officers from the United States Capitol Police, lawfully engaged in the performance of their official duties incident to, and during the commission of, a civil disorder.

Respectfully submitted,

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DEFENDANT'S ACKNOWLEDGMENT

I, William Robert Norwood, III, 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: 10.1.2024 William R. Norwood III
William Robert Norwood, III
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: 10/1/2024 MM
Marina Medvin
Attorney for Defendant