IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	**Case No: 21-cr-476**
v.	:	**18 U.S.C. §§ 111(a)(1), 113(a)(4)**
SHANE JASON WOODS,	:	
Defendant.	:	

STATEMENT OF OFFENSE

Pursuant to Federal Rule of Criminal Procedure 11, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, SHANE JASON WOODS, 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 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.

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

3. 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.

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 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.

5. 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.

6. 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, 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 law enforcement, as others in the crowd

encouraged and assisted those acts. The riot resulted in substantial damage to the U.S. Capitol, requiring the expenditure of more than $1.4 million dollars for repairs.

7. 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 p.m. 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.

WOODS's Participation in the January 6, 2021, Capitol Riot

8. On or about January 5, 2021, the DEFENDANT traveled to the Washington, D.C. area to participate in the events in Washington, D.C. on January 6, 2021.

9. On January 6, 2021, during the attack on the U.S. Capitol, the DEFENDANT assaulted, impeded, and interfered with a United States Capitol Police officer, specifically, Officer J.F. Officer J.F. was located on the lower west terrace area in the northwest corner of the U.S. Capitol on January 6, 2021. At approximately 2:10 p.m., an unknown individual sprayed Officer J.F. with a chemical irritant and then fled. Officer J.F. pursued that individual on foot. As she did, the DEFENDANT lowered his shoulder and rammed into Officer J.F., knocking her off her feet and sending her crashing into a downed bicycle barricade. As a result, Officer J.F. experienced

immediate physical pain and the next day felt as if she had been "hit by a truck" due to the DEFENDANT's actions.

10. The DEFENDANT knew at the time of the assault that Officer J.F. was engaged in the performance of her official duties. The DEFENDANT assaulted Officer J.F. with the intent to obstruct, impede, or interfere with her performance of those official duties.

11. In addition, on January 6, 2021, during the attack on the U.S. Capitol, the DEFENDANT gathered with numerous other rioters around 5 p.m. in the media staging area on the northeast side of the U.S. Capitol. The DEFENDANT and other rioters climbed over the bicycle barricades intended to separate the public from the media. The DEFENDANT then walked around some of the piled media equipment that had been and was in the process of being destroyed by other rioters and tossed some of it himself. At the same time, G.P., who was a cameraman and a member of the news media, attempted to walk away from the area to protect himself and his camera. The DEFENDANT took a running start and hit G.P. with a blindside shoulder-tackle, knocking G.P. to the ground and causing him to drop his camera. The DEFENDANT struck G.P. on the U.S. Capitol grounds, which is within the territorial jurisdiction of the United States.

12. For the assaults against Officer J.F. and member of the news media G.P., the DEFENDANT acknowledges that he acted voluntarily and on purpose, and not by mistake, accident, or with any other legal justification.

Respectfully submitted,

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DEFENDANT'S ACKNOWLEDGMENT

I, Shane Woods, have read this Statement of the Offense and have discussed it with my attorney, Dwight Crawley. 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: 9-8-22

Shane Jason Woods
Defendant

ATTORNEY'S ACKNOWLEDGMENT

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

Date: 9/8/22

Dwight Crawley
Attorney for Defendant