

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 : CRIMINAL NO. 21-CR-563 (JDB)  
 v. :  
 : 18 U.S.C. § 231(a)(3)  
 VICTORIA CHARITY WHITE, :  
 :  
 :  
 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, VICTORIA CHARITY WHITE (“WHITE”), with the concurrence of her 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. At approximately 12:58 p.m., a large crowd overran the barricades on the west side of the Capitol grounds near the Peace Circle and other areas surrounding the exterior of the Capitol.

5. At approximately 2:00 p.m., certain individuals in the crowd forced their way up the steps of the west side of the Capitol and past officers of the U.S. Capitol Police, and advanced to the upper west terrace and exterior façade of the building. The crowd then breached the Senate Wing Doors at approximately 2:13 p.m. 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.

*WHITE's Participation in the January 6, 2021 Capitol Riot*

8. The defendant, WHITE, lives in Rochester, Minnesota. On January 5, 2021, WHITE travelled from Minnesota to Washington, D.C., via car. The purpose of the defendant's trip to Washington, D.C., was to attend the rally for then-President Donald Trump.

9. Prior to January 6, WHITE occasionally participated in a live-feed Internet show on YouTube called "The Patriots Lab." During an episode on December 17, 2020, WHITE expressed the need to take more serious action against "corrupt politicians," stating as follows:

I'm to the point . . . I'm almost like, we need to do like a Bundy thing. . . . You know Cliven Bundy? . . . You just take something and say okay we're not leaving until you guys hear us out . . . to draw attention. I'm to that point . . . . Is anyone going to do it with me? . . . [T]he more people that we have with us, the bigger attention we are going to get.

10. An individual on the show responded to WHITE's statement by encouraging her not to do anything to get herself in trouble. WHITE responded:

If we don't stand now, if we don't fight back now, even if we do it without violence, right? If we aren't willing to take the risk of getting arrested. . . . If we are thankful for our country and the freedoms we have, I don't care. I'm a single mom. I don't care. I will put my life on the line if so be it, because that's going to mean freedom for my daughters in the future.

11. On January 6, 2021, at approximately 3:30 p.m., WHITE approached the west front of the Capitol Building where a large group of rioters had formed on the steps and at the entrance to the Lower West Terrace tunnel.

12. At approximately 3:45 p.m., WHITE began to push her way forward from the top of the steps near a window on the Lower West Terrace toward the tunnel entrance to the Lower West Terrace, which was packed with rioters pushing forward against Metropolitan Police Department ("MPD") officers in riot gear with riot shields. The MPD officers had positioned themselves there to prevent the rioters from entering the Capitol Building and were performing their official duties that day to assist the U.S. Capitol Police in protecting and securing the United States Capitol.

13. As WHITE moved closer to the Lower West Terrace entrance, she helped hoist up another rioter. This rioter then made his way to the tunnel entrance and proceeded to assault the MPD officers by swinging from the top of the entrance and kicking the officers. WHITE encouraged the others to push forward.

14. WHITE continued to push her way through the crowd of rioters and reached the Lower West Terrace entrance at approximately 4:05 p.m.

15. By approximately 4:07 p.m., WHITE made it to the front of the crowd of rioters and was directly in front of the line of MPD officers in riot gear. While in that position at the front of the crowd of rioters, WHITE and others attempted to push through the line of MPD officers, who were using their shields, batons, and other riot control equipment to keep the crowd back.

16. At approximately 4:11 p.m., MPD officers apprehended WHITE and placed her under arrest.

17. On January 8, 2021, WHITE participated in an interview that was posted to the Internet. During the interview, WHITE stated the following: "So they're pushing to like get in, which I confess, I admit, I was pushing to get in because I'm assuming it's just another doorway to go up to the next level."

18. On January 10, 2021, WHITE participated in another interview that was posted to YouTube. During the interview, WHITE stated the following:

We're all pushing, everyone's pushing to try to go to the next level, or so I assumed the next level. . . . So the doorway, people are trying to get through or push through. But when they are pushing, you have to understand, it's like a mass of people. A lot of people crammed together and ya know the police are right there and they were like spraying everyone like macing them. And then I look at a police officer and I'm like, you took an oath to the Constitution, and apparently that didn't sit so well with him, and he decided to hit me really hard on the head with a metal baton.

19. Thus, WHITE committed or attempted to commit an act to obstruct, impede, or interfere with one or more law enforcement officers carrying out their duties, and aided and abetted other rioters to do the same.

Respectfully submitted,

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


By: s/ Allison K. Ethen  
Allison K. Ethen  
Shalin Nohria  
Assistant United States Attorneys

DEFENDANT'S ACKNOWLEDGMENT

I, Victoria Charity White, 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:

08/07/23



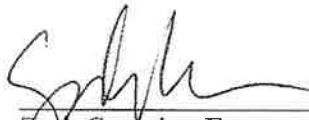
Victoria Charity White  
Defendant

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:

8-7-2023



Zach Crowdes, Esq.  
Brad Hansen, Esq.  
Attorney for Defendant