

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

UNITED STATES OF AMERICA	:	Case No: 1:21-cr-00630-CJN
	:	
	:	
	:	40 U.S.C. § 5104(e)(2)(G)
	:	
v.	:	
	:	
CLIFFORD JAMES METEER,	:	
	:	
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, Clifford James Meteer, 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.

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

8. On January 5, 2021, Meeter posted on Facebook that “I’ll be in DC on the 6th protesting the stolen election...”

9. On January 5, 2021, Meeter drove with others from Tennessee to Washington, D.C. to protest the 2020 presidential election results.

10. On January 6, 2021, Meeter walked to the Capitol and entered Capitol grounds and displayed his two-sided sign with the wording “SAVE THE REPUBLIC” on one side and

“STOP THE STEAL” on the other side. Defendant observed barriers while he was on Capitol grounds.

11. Meteer continued walking towards the Capitol building and walked up the Upper West Terrace staircase by climbing and walking on the stone handrailing while displaying his sign.

12. Meteer entered the Capitol building through the Senate Wing door at approximately 2:24 p.m. EST. While in the Capitol, Meteer displayed his sign and walked through the Crypt and then to Statuary Hall. Meteer continued through the Capitol building for several more minutes eventually nearing the House Chamber until law enforcement forcibly removed Meteer and others from the Capitol through the East Front House Door at approximately 2:55 p.m. EST.

13. On January 7, 2021, Meteer sent a private message to a friend through Facebook stating, “I was in the capital ;)”. Also, in a string of comments publically posted on Facebook on January 7, 2021, Meteer posted several statements, including, but not limited to, the following: “I was there. No riot. Trump Lives Matter. I was right where our honored veteran was viciously assassinated. Dems protest by looting Walmart; reps protest by “petitioning” congress. And their answer is a modern day Boston massacre.”, “Murder case n the capital building. Trump lives matter”, “I was there”, “Are you nuts!!!!!!? The democrat stealing the election is the cause of loyal citizens storming the Bastille”, “That’s Our house. They don’t get to disregard our vote”, “I saw no violence. I saw no destruction. Are you surprised he media is distorting reality? I saw 2 kids trying to kick in a door and we told them to stop and they did. As to violence, I was right around the corner from the vet who was murdered.”

14. On January 8, 2021, on Facebook Meteer discussed with a friend his time in the Capitol. Meteer stated, “Hey [] how you doing. I was one of those idiots scaling the wall ;)” Meteer also sent in this message photos of law enforcement who forced him out of the Capitol. Meteer also stated that he “was near where the vet was shot.” Meteer’s friend responded that, “you are so lucky that you are White. Lol” Meteer later stated, , “we weren’ making trouble” and that “ the “news coverage is Extremely overblown. I was there.” Meteer also told his friend on Facebook, “From my position, the insurrection was trying to frame Pres Trump with the collusion delusion. Or the impeachment that accused him of what Biden did. That’s My House. I saw no violence, no vandalism, no mayhem. But, from my point of view, as I have no doubt that skullduggery was done at the polls, the legitimacy of congress has been revoked. Liberalism ascertains that those who governs, governs at the will of the people. Once the sacred vote is violated, a patriots duty is to rattle the cage, to remind them who Really runs the show. And as long no great desecration occurs, honor was preserved.”

15. On August 10, 2021, the FBI arrested Meteer and executed a federal search warrant at his home on Foust Hollow Road in Knoxville, Tennessee.

16. FBI agents provided Meteer with his *Miranda* rights upon his arrest. Meteer waived his rights, and voluntarily interviewed with FBI agents. Meteer admitted that he went to Washington, D.C., on January 6, 2021 to protest the 2020 election and generally answered the FBI agents’ questions. Meteer refused to answer questions about whether he entered the Capitol building.

17. Law enforcement found several rounds of ammunition and firearms at Meteer’s residence on August 10, 2021, including, but not limited to, the following:

- 1) a Hi-Point Firearms handgun, Model: JHP, 45 caliber, S/N: 4332291, with a

magazine and ammunition;

2) a Ruger Bull Barrel handgun, .22 caliber long rifle, Model Mark II Target, with a magazine and ammunition;

3) a Weatherby 300 Magnum Bolt Action Rifle, Model: Mark V, S/N: P9706 with a Bausch and Lomb scope, a magazine and ammunition;

4) a Kimber Ultra Carry II, S/N: KU109172, 45 caliber with 6 magazines and ammunition;

5) a Springfield Armory rifle, 30 caliber, S/N: 1510512, with a magazine and ammunition;

6) a Winchester shotgun, 12 gauge, Model: 101, S/N: 109474, with ammunition.

7) a Marlin 22 long rifle, Model: 25N, S/N: 06427261 with a RedHead Pursuit Airgun scope, two magazines and ammunition.

8) a Single shot shot gun, Cannon Breach, S/N: 48974 and 13 rounds of 12 gauge shot gun shells;

9) a Ruger 380, Model: LCP, S/N: 373-04145, with a magazine and ammunition;

10) a Ruger Black Hawk 357, S/N: 111860, with ammunition;

18. Meteer also interviewed with news reporters after he was arrested. Some of his interviews, and reports of his interviews, can be found online at

<https://www.wbir.com/article/news/local/feds-knoxville-man-illegally-entered-us-capitol-during-jan-6-riot-carrying-stop-the-steal-sign/51-dd6de1e7-b014-4348-a1e1-89dc6e3c31e8>,

<https://www.knoxnews.com/story/news/crime/2021/08/10/knoxville-clifford-meteer-arrested-connection-jan-6-capitol-riot/5559744001/>, and <https://www.wate.com/news/knoxville-man-facing-charges-from-capitol-riot-calls-jan-6-events-peaceful/>.

19. Meteer knew at the time he entered the U.S. Capitol Building that he did not have permission to enter the building and the defendant paraded, demonstrated, or picketed.

Respectfully submitted,

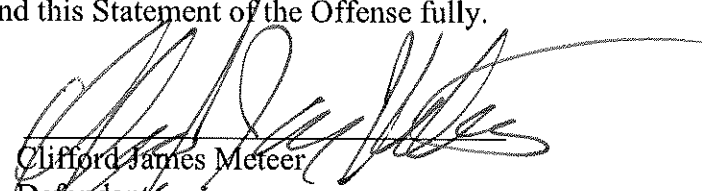
MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Anthony L. Franks
Anthony L. Franks
Assistant United States Attorney

DEFENDANT'S ACKNOWLEDGMENT

I, Clifford James Meteer, 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: 1/5/22


Clifford James Meteer
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: 1-5-22


Ben Sharp
Attorney for Defendant