

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

JOHN LAMMONS,

Defendant.

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Case No.: 22-CR-103-RCL

40 U.S.C. § 5104(e)(2)(G)

*let this be filed.
Properly Labeled
U.S.C. 11/8/22*

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, **John Lammons**, 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 the Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election,

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.

John Lammons' Participation in the January 6, 2021, Capitol Riot

8. The defendant, **John Lammons**, lives in Galveston, Texas. On January 4, 2021, defendant traveled from Texas to Virginia, via his own truck. The purpose of the defendant's trip to Washington, D.C., was to protest Congress' certification of the Electoral College.

9. On January 6, 2021, the defendant traveled from his hotel in Virginia to the "Stop the Steal" rally in Washington, D.C. After the "Stop the Steal" rally, the defendant marched with other protestors to the U.S. Capitol building. The defendant took multiple pictures and videos of himself marching to the Capitol building, outside the Capitol building, and inside the Capitol building. Additionally, the defendant texted multiple people about being inside the Capitol building on January 6, 2021.

10. The defendant recorded himself marching down Pennsylvania Avenue with other rioters on January 6 and recorded himself on the west side of the Capitol building. The defendant

inside the Capitol with the message, "We honestly wanted to just get inside and see what they were saying after we left some idiots came in and did some stupid things but the first group was totally professional." When asked if he got arrested, the defendant said, "No bro talked my way out."

Elements of the Offense

14. John Lammons knowingly and voluntarily admits to all the elements of parading, demonstrating, or picketing within a Capitol building. Specifically, defendant admits that:

- Defendant admits that while inside the Capitol, defendant willfully and knowingly paraded, demonstrated, or picketed.

Respectfully submitted,

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By:



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