

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

<b>UNITED STATES OF AMERICA</b>	:	Case No.: 23-CR-247 (JMC)
	:	
v.	:	40 U.S.C. § 5104(e)(2)(G)
	:	
<b>KARTHIK RAMAKRISHNAN,</b>	:	
	:	
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, **KARTHIK RAMAKRISHNAN**, 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 (hereinafter, “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, including the West Front, 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 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.

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. 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 \$1.4 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,

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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.

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

8. On January 5, 2021, the defendant, KARTHIK RAMAKRISHNAN, drove from his home in southwest Virginia to the MGM Hotel in National Harbor, Maryland.

9. On January 6, 2021, RAMAKRISHNAN traveled from National Harbor to Washington, D.C., and attended the “Stop the Steal” demonstration at the Ellipse.

10. Sometime prior to 2:00pm, RAMAKRISHNAN walked from the area around the National Mall to the West Front of the United States Capitol.

11. Starting at around 1:00 p.m. on January 6, 2021, a large crowd began amassing on the West Front of the Capitol. Between 1:00 p.m. and 2:08 p.m., the crowd became increasingly hostile to the Washington, D.C., Metropolitan Police Department (hereinafter, “MPD”) and USCP officers who were attempting to hold the line on the West Front and prevent the crowd from advancing towards the Capitol while the Joint Session was meeting. Between approximately 2:08 p.m. and 2:11 p.m., rioters broke through the line of officers at the base of the Northwest Stairs. The crowd overwhelmed officers and by 2:12 p.m., had gained access to the Northwest Courtyard

on the Upper West Terrace of the Capitol. At 2:13 p.m., rioters breached the Capitol via the Senate Wing Door.

12. At approximately 2:18 p.m., RAMAKRISHNAN was in the Northwest Courtyard. RAMAKRISHNAN was dressed in blue jeans, a brown and orange Burton ski coat, a black ski cap, a red backpack, red gloves, and a white surgical mask. RAMAKRISHNAN also had a small drum, which he was banging.

13. Between 2:18 p.m. and 2:19 p.m., RAMAKRISHNAN remained in the Northwest Courtyard banging the drum.

14. At 2:20 p.m., RAMAKRISHNAN entered the Capitol via the Senate Wing Door. As RAMAKRISHNAN entered the Senate Wing Door, he heard alarms sounding and saw broken glass on either side of the door. At the time that he entered the Senate Wing Door, RAMAKRISHNAN knew that he was not permitted to enter the Capitol.

15. Between 2:20 p.m. and 2:47 p.m., RAMAKRISHNAN paraded throughout the Capitol. RAMAKRISHNAN entered the Crypt and Statuary Hall while he was inside of the Capitol. As he made his way through the Capitol, RAMAKRISHNAN moved as part of a group and continued banging his drum.

16. At approximately 2:45 p.m., RAMAKRISHNAN was inside of the East House Corridor and was still banging his drum.

17. At approximately 2:47, RAMAKRISHNAN exited the Capitol via the East House Door.

*Elements of the Offenses*

18. RAMAKRISHNAN admits to all the elements of parading, demonstrating, or picketing in any of the Capitol buildings. RAMAKRISHNAN willfully and knowingly entered


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the Capitol through the Senate Wing Door. At the time of his actions, RAMAKRISHNAN knew that he was not permitted to enter the Capitol and that his conduct was unlawful.

Respectfully submitted,

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

By:

  
~~SEAN P. McCAULEY~~  
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**DEFENDANT'S ACKNOWLEDGMENT**

I, KARTHIK RAMAKRISHNAN, 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: 8/28/23

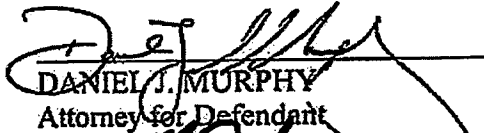


\_\_\_\_\_  
KARTHIK RAMAKRISHNAN  
Defendant

**ATTORNEY'S ACKNOWLEDGMENT**

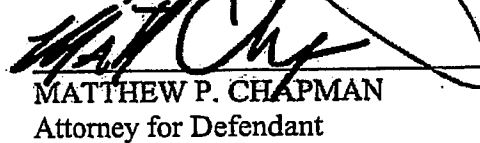
I have read this Statement of the Offense and have reviewed it with my client fully. I concur in my client's desire to adopt this Statement of the Offense as true and accurate.

Date: 8/27/23



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DANIEL J. MURPHY  
Attorney for Defendant

Date: 8/28/23



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MATTHEW P. CHAPMAN  
Attorney for Defendant

