

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

**FILED**

**NOV 21 2023**

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 23-cr-396 (TSC)
	:	
DENNIS GEORGE ADAMS,	:	18 U.S.C. § 1752(a)(1)
	:	
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, Dennis George Adams, 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. The grounds around the Capitol were posted and cordoned off, and the entire area as well as the Capitol building itself were restricted as that term is used in Title 18, United States Code, Section 1752 due to the fact that the Vice President and the immediate family of the Vice President, among others, would be visiting the Capitol complex that day.

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 separate chambers of the Capitol 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 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 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 p.m., 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 p.m., 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 \$2.9 million dollars for repairs.

7. Shortly thereafter, at approximately 2:20 p.m., 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 p.m. 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 p.m. 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.

*Adams' Participation in the January 6, 2021, Capitol Riot*

8. The defendant, Dennis George Adams (Adams), lives in Enumclaw, Washington State. Adams drove by car from Washington State to the Washington, D.C. metropolitan area with his friend, M.W., in order to attend the 'Stop the Steal' rally on January 6, 2021. The purpose of the rally was to protest Congress' certification of the Electoral College. After arriving in the D.C. area, Adams and M.W. checked in to a hotel in Maryland.

9. On January 6, 2021, Adams and M.W. attended the former President's speech near the Ellipse. Adams and M.W. were far away from the former President, and being unable to hear or see the former President, they decided to leave the speech early and walk towards the U.S. Capitol building. As Adams approached the Capitol grounds, he could see orange mesh fencing,

which Adams knew was a barrier to prohibit pedestrian traffic. Adams ignored the mesh fencing and continued onwards towards the Capitol.

10. Adams entered Capitol grounds on the west front just north of the Grant Monument. Adams observed approximately six police officers guarding a line of fencing. He saw a rioter push over the fencing and saw that the police officers were forced to retreat closer towards the Capitol building. Adams heard one rioter yell “Let’s go!”, and M.W. responded “Leaders lead from the front.” Adams knew that he was not permitted to go past the knocked over fencing, but he decided to walk over it and proceed closer towards U.S. Capitol building.

11. As he approached the Capitol, Adams could see a column of rioters wearing matching brown outfits that moved towards a police line and sprayed bear spray at police.

12. Adams climbed up to the scaffolding of the Inaugural Stage that was then under construction, and stayed there for approximately 15 minutes. While Adams was in the scaffolding, he was hit with pepper balls fired by police officers. From his high vantage point in the scaffolding, Adams had a view of rioters physically confronting and pushing against police in attempts to break the police lines.

13. After rioters pushed past the police line and moved up the northwest staircase, Adams climbed down from the scaffolding and followed the mob into the plaza on the Upper West Terrace. While on the Upper West Terrace plaza, Adams could hear rioters with bullhorns yelling “It is your Capitol! Take it!”

14. Adams stood by a windowsill near the Parliamentarian Door. He saw that door breached by rioters and he then entered through it at approximately 2:57 p.m. As he entered, Adams heard the sounds of blaring alarms. As police began to push back rioters, Adams was pushed back out through the same door roughly three minutes after entering.

15. Adams re-entered the U.S. Capitol building at approximately 3:08 p.m. through a broken window by the Senate Wing Door. Adams walked towards the Crypt and entered it at 3:15 p.m., and he stayed in that area until roughly 3:20 p.m. After exiting the Crypt, he walked slowly back toward the Senate Wing Door, and he exited the Capitol building at 3:26 p.m.

16. After exiting the U.S. Capitol, Adams walked towards the North Door, where he watched other rioters confront police and try to create a new breach. Adams saw police shooting chemical irritants in in their attempt to disburse the rioters, and Adams was hit by those chemical irritants. Adams remained by the North Door area until he and other rioters were pushed out by police officers.

17. When Adams entered the U.S. Capitol building on January 6, it was a restricted building. Adams knew at the time he entered the U.S. Capitol building that he did not have lawful authority to enter the building.

### *Elements of the Offense*

18. The parties agree that a violation of 18 U.S.C. § 1752(a)(1) requires the following elements:

- a. The defendant entered or remained in a restricted building or grounds without lawful authority to do so;
- b. The defendant did so knowingly.

19. The defendant knowingly and voluntarily admits to all the elements as set forth above. Specifically, the defendant admits that when he entered the U.S. Capitol building on January 6, 2021, it was a restricted building and that he knew at the time he entered the U.S. Capitol building that he did not have lawful authority to enter the building.

Respectfully submitted,

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

MELANIE KREBS  
PILOTTI

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KREBS PILOTTI  
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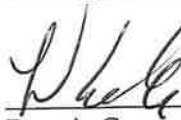
By:           /s/ *Melanie Krebs-Pilotti*          

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**DEFENDANT'S ACKNOWLEDGMENT**

I, Dennis George Adams, 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: 10-24-2023



\_\_\_\_\_  
Dennis George Adams  
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: 10/24/23



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Burke Wonnell  
Attorney for Defendant