IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	**Case No.:**
v.	:	**40 U.S.C. §§ 5104(e)(2)(D), 5104(e)(2)(G)**
NATALIE BEYELER,	:	
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, Natalie Beyeler, with the concurrence of the defendant's 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. 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. Officers with the D.C. Metropolitan Police Department were called to assist officers of the USCP who were then engaged in the performance of their official duties. 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.

The Defendant's Participation in the January 6, 2021, Capitol Riot

8. Natalie Beyeler and her friend T.B., charged elsewhere, spent the night in Washington, D.C. on January 5, 2021. On January 6, 2021, Beyeler and T.B. attended the Trump Rally at the Ellipse, near the Washington Monument.

Image 1 - Beyeler standing in front of the Washington Monument during the Trump Rally

9. After the rally, Beyeler and T.B. walked to the Capitol. Once arrived at the Capitol grounds, Beyeler and T.B. walked up the stairs at the West Front, passed thousands of rioters and through multiple downed barricades, towards the Capitol building.

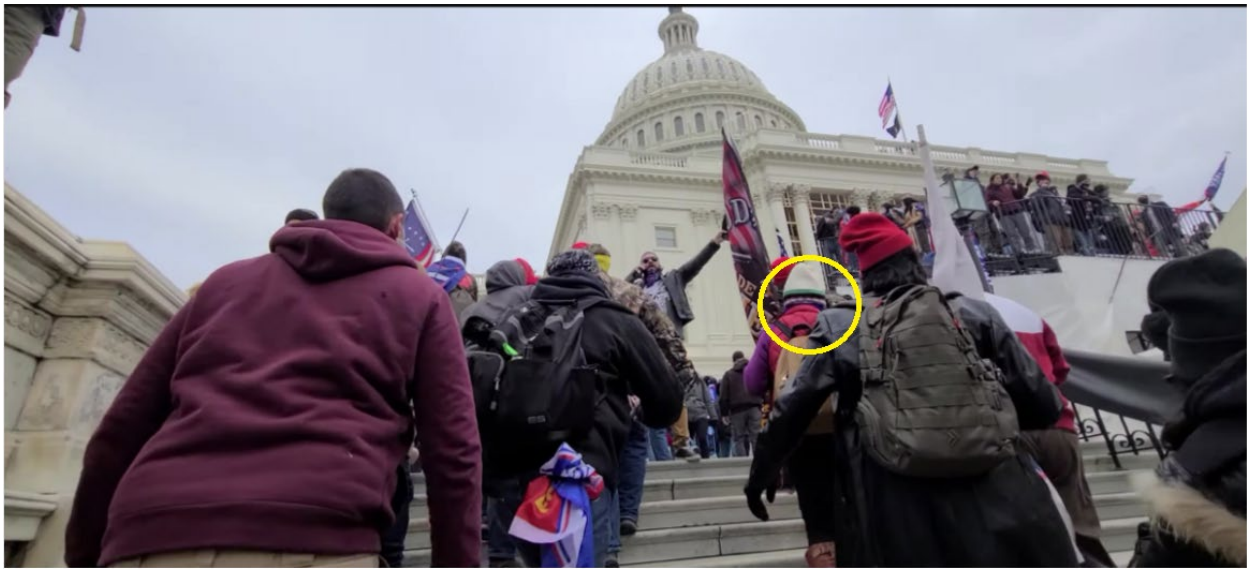


Image 2 - Beyeler walking up the steps at the West Front towards the Capitol building

10. Once arrived at the Upper West Terrace, Beyeler and T.B. could see a line of police officers.

Image 3 - Beyeler, checking her phone, with a line of police officers behind her

11. Instead of turning around and leaving the U.S. Capitol grounds, Beyeler and T.B. entered the U.S. Capitol building. In fact, Beyeler and T.B. entered the Capitol building two times on January 6, 2021. Beyeler entered the Capitol building, knowing that Congress was in session and intending to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress.

12. Beyeler, carrying a flag, and T.B. first entered at 2:55 p.m. through the Parliamentarian Door, also known as the Senate Fire Door. At the time she entered, Beyeler knew she was not authorized to be in the Capitol Building or on the grounds.

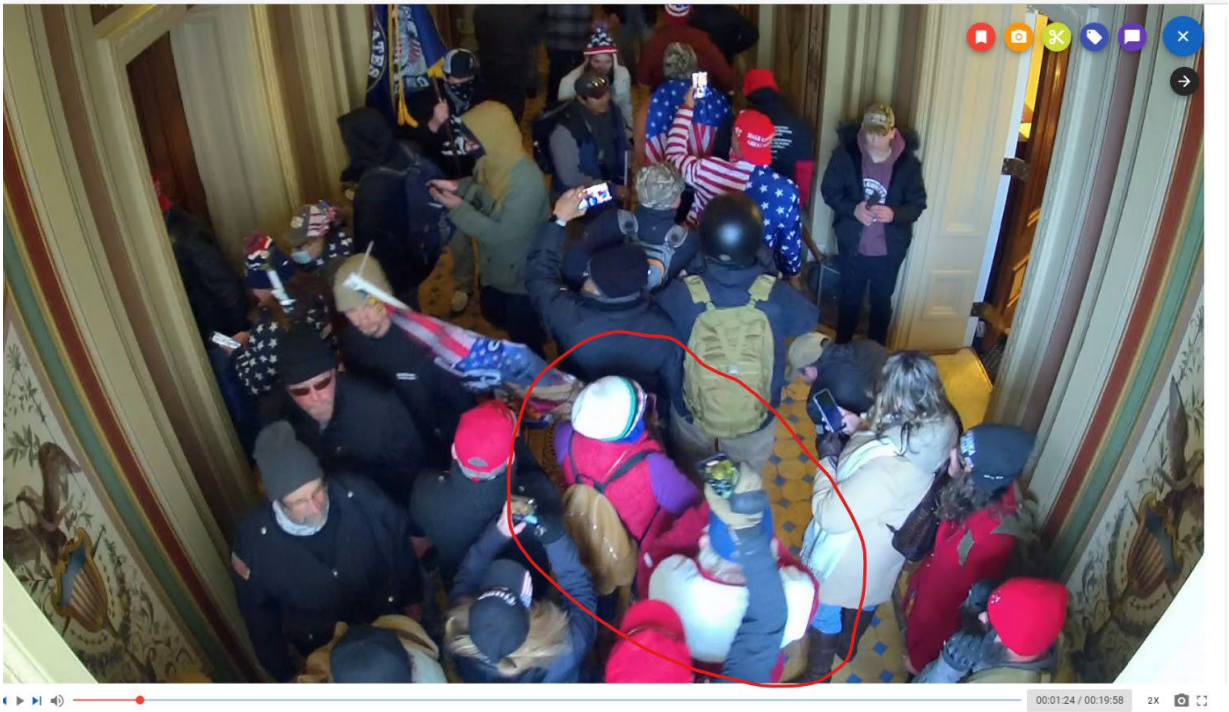


Image 4 - Viewed from the back, Beyeler followed by T.B. entering the Capitol building at 2:55 p.m.

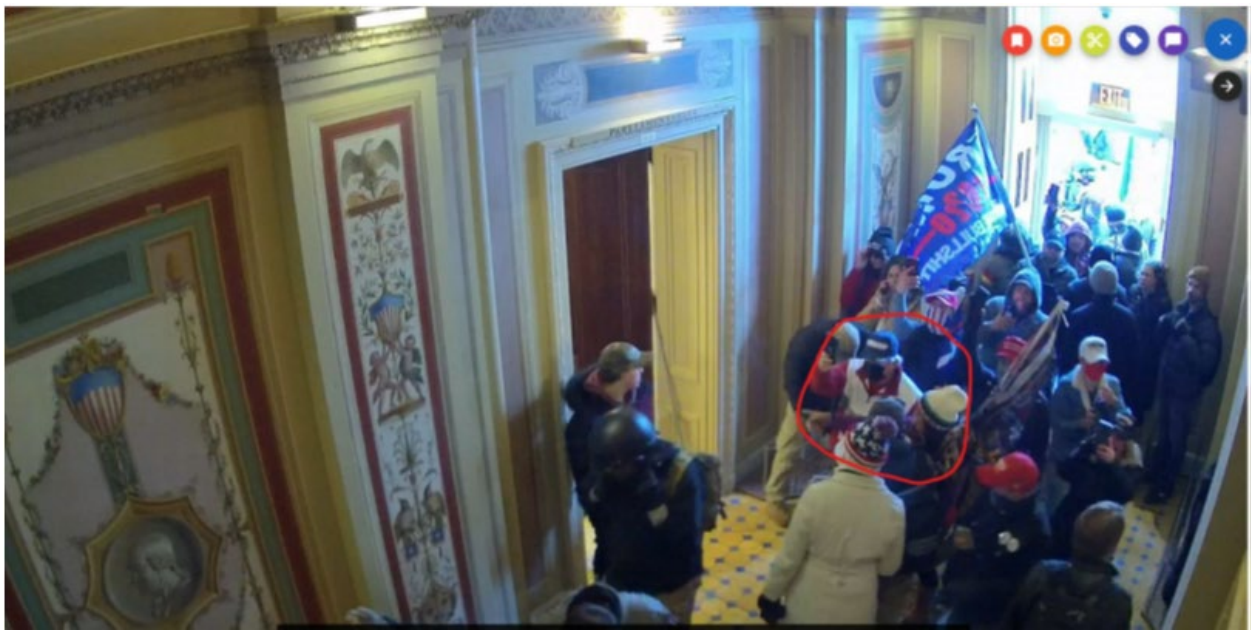
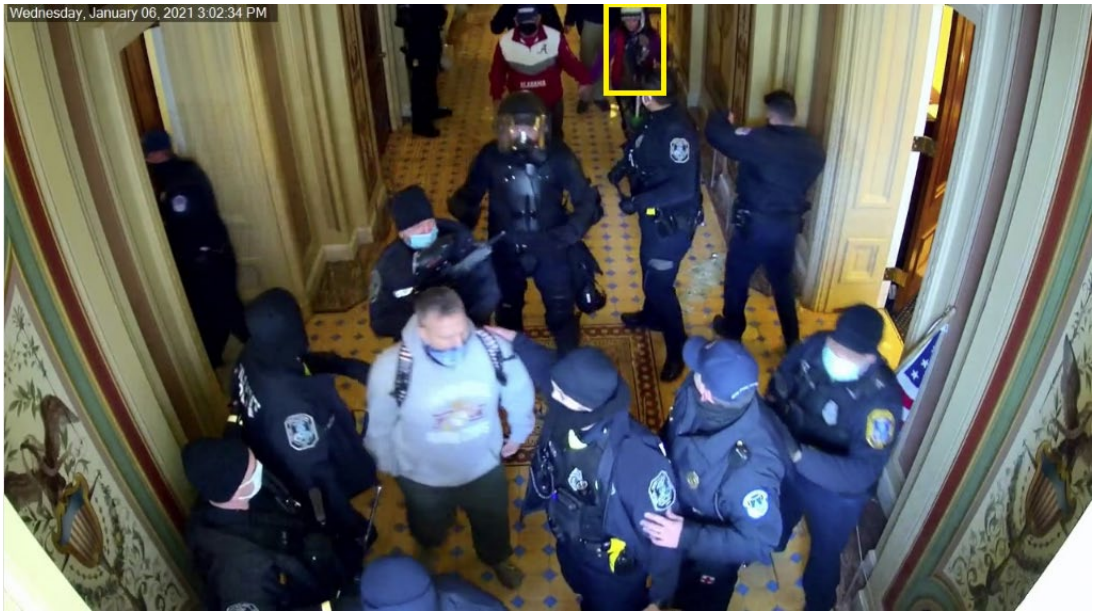
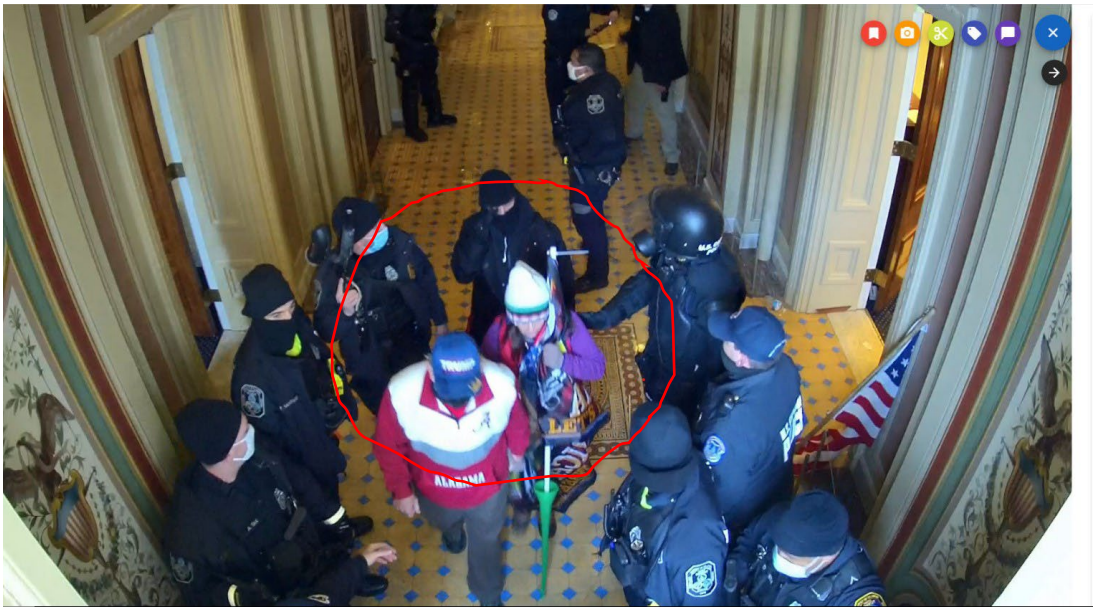


Image 5 – Viewed from the front, Beyeler and T.B. entering the Capitol building at 2:55 p.m.

13. Beyeler and T.B. were stopped by police officers who blocked them from advancing further and required them to leave the building. Beyeler and T.B. turned around and walked out the same door, escorted by police officers, seven minutes later, at 3:02 p.m.:





Images 6 and 7 - T.B. and Beyeler, holding her flag, being escorted out of the Capitol building by officers through the same door at 3:02 p.m.

14. Despite being required to leave the building minutes earlier, T.B. and Beyeler walked past fellow rioters who were climbing in through the window and re-entered the U.S. Capitol building at 3:10 p.m., this time through the Senate Wing door with the fire alarm blaring:

Image 8 – Beyeler and T.B. walking past rioter climbing in through the window

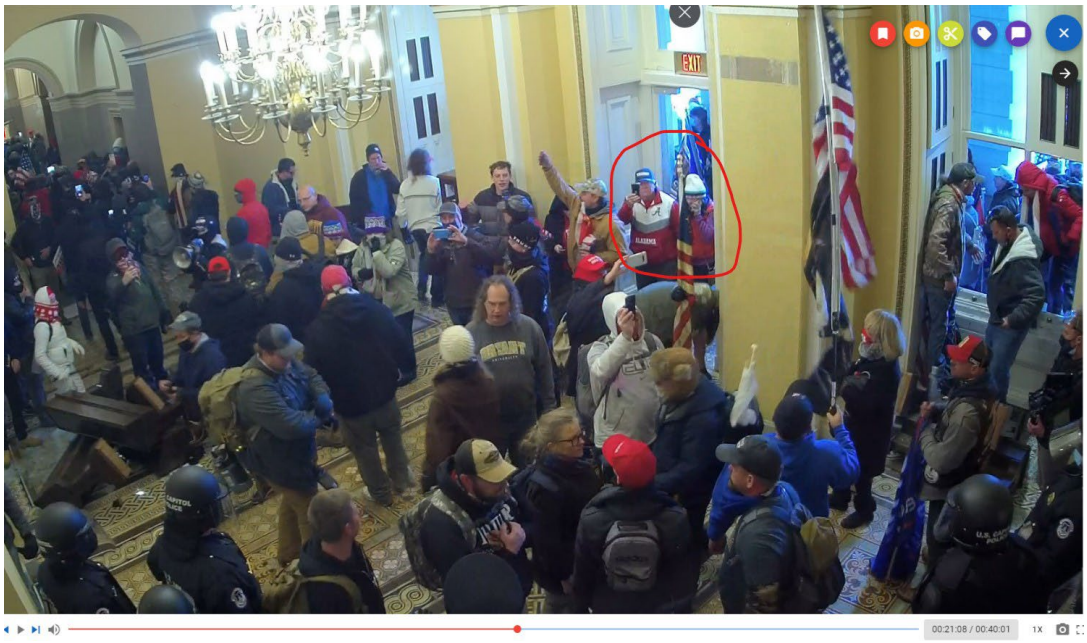


Image 9 - T.B. and Beyeler walking in through the Senate Wing Door at 3:10 p.m.

15. After walking into the U.S. Capitol building for the second time, the two walked to, and then around, the Crypt:

Image 10 - T.B. and Beyeler in the Crypt

16. Beyeler and T.B. spent about 15 minutes inside the Capitol building, and then walked back out through the Senate Wing Door at 3:25 p.m.:

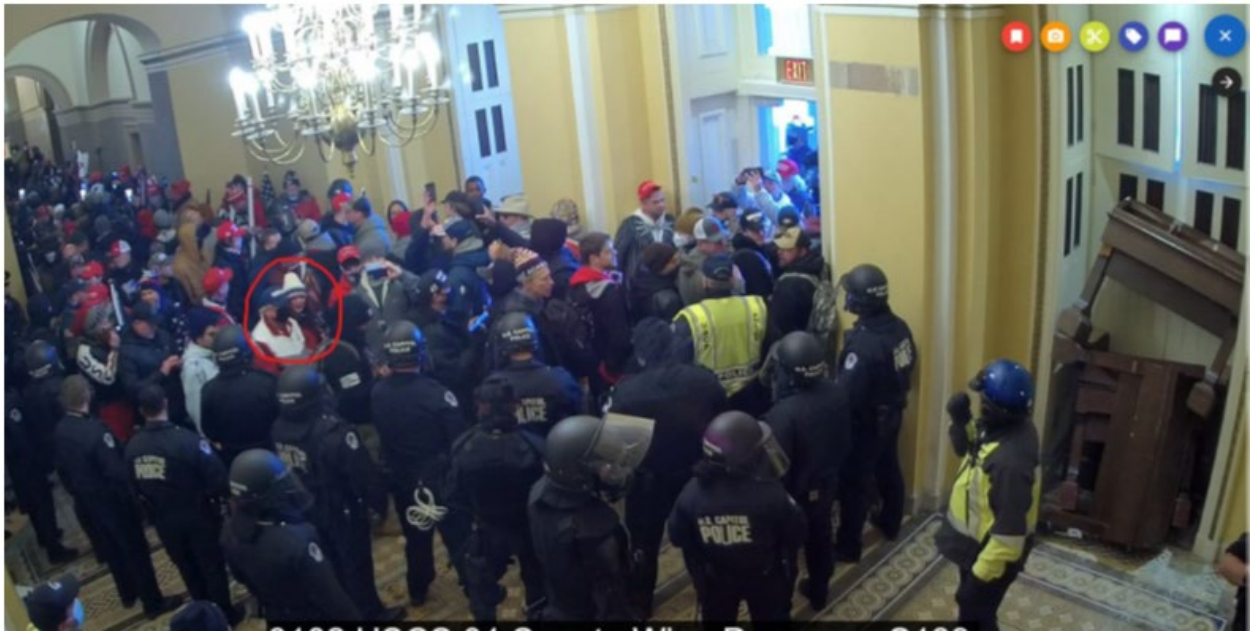


Image 11 - Beyeler and T.B., amongst many protesters walking out of the Senate Wing Door at 3:25 p.m.

17. Beyeler engaged in disorderly or disruptive conduct when she entered the Capitol building multiple times, despite being ordered not to do so by police officers. Further, Beyeler paraded, demonstrated, or picketed while inside the Capitol building.

18. Beyeler and T.B. stood and watched the rioters and walked past a police line before finally leaving the Capitol grounds.

Image 12 – Beyeler and T.B. watching other rioters

Image 13- Beyeler walking past a police line

19. During the entire event, as described in this Statement of Offense, Beyeler was acting willfully and knowingly.

Elements of the Offenses

20. The parties agree that 40 U.S.C. § 5104(e)(2)(D) requires the following elements:

a. The defendant engaged in disorderly or disruptive conduct at any place in the Grounds or in any of the Capitol Buildings;

b. The defendant engaged in such actions with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and

c. The defendant acted willfully and knowingly.

Title 40, United States Code, Section 5101, defines "Capitol Buildings" as including "the United States Capitol."

21. The parties agree that 40 U.S.C. §5104(e)(2)(G) requires the following elements:

a. The defendant paraded, demonstrated, or picketed in any of the Capitol Buildings; and

b. The defendant did so willfully and knowingly.

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Defendant's Acknowledgments

22. The defendant knowingly and voluntarily admits to all the elements as set forth above.

Respectfully submitted,

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

By: */s/ Alexandra F. Foster*
ALEXANDRA F. FOSTER
Assistant United States Attorney - Detailee
U.S. Attorney's Office for the District of Columbia
601 D Street, N.W.
Washington, D.C. 20530
Office Tel.: 619-546-6735
Email: alexandra.foster@usdoj.gov

DEFENDANT'S ACKNOWLEDGMENT

I, Natalie Beyeler, 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: 20 Feb 24

NATALIE BEYELER
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: Feb 20, 2024

BRIAN HEADY
Attorney for Defendant