

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

UNITED STATES OF AMERICA	:	CASE NO.: 24-cr-277 (JMC)
	:	
v.	:	
	:	
CRAIG JACKSON MOORE,	:	VIOLATIONS:
	:	
	:	40 U.S.C. § 5104(e)(2)(D),
Defendant.	:	40 U.S.C. § 5104(e)(2)(G)
	:	

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, Craig Jackson Moore, 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.

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. USCP officers were forced to retreat, and the crowd advanced to the exterior façade of the building. D.C. Metropolitan Police Department officers were called to assist USCP officers 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 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. USCP officers 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. The defendant, Craig Jackson Moore, traveled from Texas to the Washington, D.C. area by plane, arriving by January 4, 2021. The purpose of the defendant's trip to Washington, D.C., was to protest Congress's certification of the Electoral College vote.

9. On January 6, Moore attended the "Stop the Steal" rally and then marched with others to the Capitol. At the Capitol, Moore stood in a restricted area near the West Terrace and observed, among other things, police officers in riot gear and rioters climbing temporary scaffolding that had been set up for the inaugural stage.

10. At approximately 3:11 p.m., Moore approached a door on the north side of the Capitol. There were two police officers in riot gear standing at the door who were greatly

outnumbered by the rioters trying to enter the Capitol. One of the officers stated that if rioters entered the Capitol, they would probably be arrested.

11. Moore then passed the police officers in riot gear and entered the Capitol through the door. He entered a location known as the Brumidi Corridor without lawful authority to do so. An alarm could be heard over the door as Moore and the group of rioters entered.

12. Moore joined a group of rioters who confronted a police line that was trying to prevent the rioters from penetrating deeper into the Capitol. The rioters chanted, among other things, “Our House!” Moore remained inside the Capitol until he and others were forcibly expelled by police minutes after entering.

Elements of the Offense

13. The parties agree that 40 U.S.C. § 5104(e)(2)(D) requires the following elements:
- a. First, the defendant engaged in disorderly or disruptive conduct in any of the United States Capitol Buildings or Grounds.
 - b. Second, the defendant did so with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress.
 - c. Third, the defendant acted willfully and knowingly.
14. The parties agree that 40 U.S.C. § 5104(e)(2)(G) requires the following elements:
- a. First, the defendant paraded, demonstrated, or picketed in any of the United States Capitol Buildings.
 - b. Second, the defendant acted willfully and knowingly.

Defendant’s Acknowledgments

15. The defendant knowingly and voluntarily admits to all the elements as set forth above. Specifically, the defendant admits that the defendant willfully and knowingly engaged in

disruptive conduct in the United States Capitol Building, and paraded in the United States Capitol Building, with the intent to disrupt the orderly conduct of a session of Congress.

Respectfully submitted,

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