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Clerk, U.S. District and Bankruptcy Courts

**FILED**

September 01, 2022  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

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

**Holding a Criminal Term**

**Grand Jury Sworn in on January 8, 2021**

**Austin case 1:22-MJ-743-DH**

BY:                     JF                      
  DEPUTY

**UNITED STATES OF AMERICA**

**v.**

**KELLYE SORELLE,**

**Defendant.**

- : CRIMINAL NO.**
- :**
- : VIOLATIONS:**
- :**
- : COUNT 1:**
- : 18 U.S.C. § 1512(k)**
- : (Conspiracy to Obstruct an Official**
- : Proceeding)**
- :**
- : COUNT 2:**
- : 18 U.S.C. §§ 1512(c)(2), 2**
- : (Obstruction of an Official Proceeding and**
- : Aiding and Abetting)**
- :**
- : COUNT 3:**
- : 18 U.S.C. § 1752(a)(1)**
- : (Entering and Remaining in a Restricted**
- : Building or Grounds)**
- :**
- : COUNT 4:**
- : 18 U.S.C. § 1512(b)(2)(A)-(B)**
- : (Obstruction of Justice—Tampering with**
- : Documents)**

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**  
**(18 U.S.C. § 1512(k))**  
**(Conspiracy to Obstruct an Official Proceeding)**

From in and around December 2020, through in and around January 2021, in the District of Columbia and elsewhere, **KELLYE SORELLE** did knowingly combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to corruptly obstruct, influence, and impede an official proceeding, that is, Congress's certification of the Electoral College vote as set out in the Twelfth Amendment of the Constitution of the United States and 3 U.S.C. §§ 15-18, in violation of Title 18, United States Code, Section 1512(c)(2).

(In violation of Title 18, United States Code, Section 1512(k))

**COUNT TWO**  
**(18 U.S.C. §§ 1512(c)(2), 2)**  
**(Obstruction of an Official Proceeding and Aiding and Abetting)**

On or about January 6, 2021, within the District of Columbia and elsewhere, **KELLYE SORELLE** attempted to, and did, corruptly obstruct, influence, and impede an official proceeding, that is, a proceeding before Congress, specifically, Congress's certification of the Electoral College vote as set out in the Twelfth Amendment of the Constitution of the United States and 3 U.S.C. §§ 15-18, and did aid and abet others known and unknown to the Grand Jury to do the same.

(In violation of Title 18, United States Code, Sections 1512(c)(2), 2)

**COUNT THREE**  
**(18 U.S.C. § 1752(a)(1))**  
**(Restricted Building or Grounds)**

On or about January 6, 2021, in the District of Columbia, **KELLYE SORELLE** did knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off, and otherwise restricted area within the United States Capitol and its grounds, where the Vice President was temporarily visiting, without lawful authority to do so.

(In violation of Title 18, United States Code, Section 1752(a)(1))

**COUNT FOUR**  
**(18 U.S.C. § 1512(b)(2)(A)-(B))**  
**(Obstruction of Justice—Tampering with Documents)**

On or about January 7, 2021, in the District of Columbia and elsewhere, **KELLYE SORELLE** did corruptly persuade and attempt to corruptly persuade other persons with intent to cause and induce such persons to (A) withhold records, documents, and other objects from an official proceeding, that is, the Grand Jury investigation into the attack on the United States Capitol on January 6, 2021, and (B) alter, destroy, mutilate, and conceal objects with intent to impair the objects' integrity and availability for use in such a Grand Jury investigation.

(In violation of Title 18, United States Code, Section 1512(b)(2)(A)-(B))

A TRUE BILL:

FOREPERSON.



MATTHEW M. GRAVES  
ATTORNEY FOR THE UNITED STATES  
IN AND FOR THE DISTRICT OF COLUMBIA

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
District of Columbia

United States of America
v.
KELLYE SORELLE

Defendant

Case: 1:22-cr-00290
Assigned to: Judge Mehta, Amit P.
Assign Date: 8/31/2022
Description: INDICTMENT (B)
Related Case Nos: 22-cr-15 and 21-cr-28 (APM)

Austin case 1:22-MJ-743-DH

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) KELLYE SORELLE
who is accused of an offense or violation based on the following document filed with the court:

- Indictment
Superseding Indictment
Information
Superseding Information
Complaint
Probation Violation Petition
Supervised Release Violation Petition
Violation Notice
Order of the Court

This offense is briefly described as follows:

- 18 U.S.C. § 1512(k)
(Conspiracy to Obstruct an Official Proceeding)
18 U.S.C. §§ 1512(c)(2), 2
(Obstruction of an Official Proceeding and Aiding and Abetting)
18 U.S.C. § 1752(a)(1)
(Entering and Remaining in a Restricted Building or Grounds)
18 U.S.C. § 1512(b)(2)(A)-(B)
(Obstruction of Justice--Tampering with Documents)

Date: 08/31/2022

City and state: Washington, D.C.

Robin M. Meriweather

Issuing officer's signature

Robin M. Meriweather, United States Magistrate Judge
Printed name and title

Return

This warrant was received on (date) , and the person was arrested on (date)
at (city and state)

Date:
Arresting officer's signature

Printed name and title