

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No.: 1:22-cr-197 (DLF)**
 :
 : **18 U.S.C. § 231(a)(3)**
GEOFFREY SHOUGH :
 :
 Defendant. :

STATEMENT OF OFFENSE

Pursuant to Federal Rule of Criminal Procedure 11, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Geoffrey Shough, 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 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification are allowed access inside the U.S. Capitol.
2. On January 6, 2021, the exterior plaza of the U.S. Capitol was closed to members of the public.
3. On January 6, 2021, a joint session of the United States Congress convened at the United States 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 the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on 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 U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building 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, and officers of the U.S. Capitol Police, 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 by U.S. Capitol Police Officers or other authorized security officials.

6. At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police 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 U.S. 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 U.S. Capitol, requiring the expenditure of more than \$1.4 million dollars for repairs.

7. Shortly thereafter, at approximately 2:20 p.m., members of the United States House of Representatives and United States 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. the same day. In light of the dangerous circumstances caused by the unlawful entry to the U.S. Capitol, including the danger posed by individuals who had entered the U.S. Capitol without any security screening or weapons check, Congressional proceedings could not resume until after every unauthorized occupant had left the U.S. Capitol, and the building had been confirmed secured. The proceedings resumed at approximately 8:00 p.m. after the building had been secured. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the session resumed.

Geoffrey Shough's Participation in the January 6, 2021 Capitol Riot

8. The defendant, Geoffrey Shough, lives in Austin, Texas. On January 2, 2021, the defendant rented a car and began his travel to Washington, D.C. The purpose of the defendant's trip to Washington, D.C., was to protest Congress's certification of the Electoral College.

9. The defendant attended the former President's "Stop the Steal" rally on the Ellipse and then marched with other protestors to the Capitol. The defendant wore a jacket that was orange-brown in color over a body armor vest with a Texas flag patch, a ballistic-style helmet with an Oath Keepers decal on the back and American flag on the front, goggles, hard-knuckle gloves, and a tan pouch attached at his hip.

10. At approximately 1:50 p.m. on January 6, 2021, Shough stood with a crowd of rioters in a restricted area, the West Lawn of the U.S. Capitol grounds. He carried and waved a

large Texas flag and cheered as other rioters attacked and then overwhelmed police officers nearby on the Northwest Steps.

11. The defendant then proceeded to the Northwest Courtyard of the U.S. Capitol Grounds, outside the Senate Wing Door.

12. Shough forcibly and unlawfully entered the U.S. Capitol Building through the Senate Wing Door at 2:48 p.m. on January 6, 2021. Shough was among the first few individuals to breach a line of uniformed Capitol Police Officers who were attempting to prevent the rioters from entering the Capitol. The rioters overwhelmed the officers and entered the U.S. Capitol.

13. Shough then engaged in an animated conversation with one or more of the Capitol Police Officers before moving further into the U.S. Capitol Building.

14. Shough traveled through the Crypt, past the House Wing Door, through the Hall of Columns, and, at approximately 3:03 p.m., exited the U.S. Capitol through the South Door. He was inside the U.S. Capitol Building for approximately 15 minutes.

Elements of the Offense

15. The defendant engaged in civil disorder, in violation of 18 U.S.C. § 231(a)(3).

16. Specifically, the defendant admits that he committed or attempted to commit an act to obstruct, impede, or interfere with United States Capitol Police Officers who were lawfully engaged in the lawful performance of their official duties incident to and during the commission of a civil disorder.

17. The defendant further admits that the civil disorder obstructed, delayed, or adversely affected commerce or the movement of any article or commodity in commerce or the

conduct or performance of any federally protected function.

Respectfully submitted,

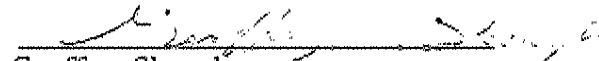
MATTHEW M. GRAVES
United States Attorney

By: /s/ Jordan A. Konig
Jordan A. Konig
Trial Attorney, U.S. Department of Justice

DEFENDANT'S ACKNOWLEDGMENT

I, Geoffrey Shough, 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.

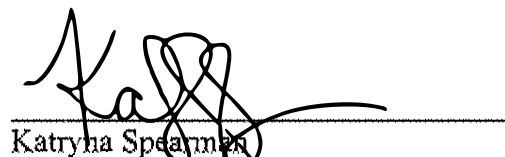
Date: July 14, 2022


Geoffrey Shough
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: July 15, 2022


Katryna Spearman
Attorney for Defendant

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Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney

By: /s/ Jordan A. Konig
Jordan A. Konig
Trial Attorney, U.S. Department of Justice

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Date: _____

Katryna Spearman
Attorney for Defendant