

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

UNITED STATES OF AMERICA	:	
	:	Case No.: 21-CR-223 (APM)
v.	:	
	:	18 U.S.C. § 1512(c)(2) and 2
	:	18 U.S.C. § 1752(a)(1)
MATTHEW MARK WOOD,	:	18 U.S.C. § 1752 (a)(2)
	:	40 U.S.C. § 5104(e)(2)(C)(i)
Defendant.	:	40 U.S.C. § 5104(e)(2)(D)
	:	40 U.S.C. § 5104(e)(2)(G)
	:	

STATEMENT OF OFFENSES

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, Matthew Mark Wood, 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.

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 \$1.4 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. Considering 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.

Matthew Mark Wood's Participation in the January 6, 2021, Capitol Riot

8. The defendant, Matthew Mark Wood, lives in North Carolina. On January 5, 2021, defendant drove with his grandmother and another family member from North Carolina to Washington, D.C. The purpose of the Wood's trip to Washington, D.C., was to protest Congress' certification of the Electoral College. When he entered the Capitol on January 6, 2021, he did so with the intent to disrupt the certification proceedings.

9. Prior to January 6, on January 2, 2021, Wood sent an iMessage to another individual, in which he indicated, "If they want to raid Congress, sign me up, I'll be brave heart in that bitch!"

10. On January 6, 2021, Wood approached the Capitol from the west making his way to the West Plaza soon after the breach of the police line at the Peace Circle. Wood was in the West Plaza for approximately an hour before going under the NW scaffolding and climbing the

NW stairs. Soon after the breach of the police line on the NW stairs, Wood followed others to the NW Plaza. Wood was several feet behind those who broke out and climbed through the Capitol's window that is north of the doorway commonly referred to as the Senate Wing Door. Wood was the tenth person to enter through that window, and did so at approximately 2:13 p.m.

11. Once inside the Capitol, Wood followed others through the Brumidi Corridors, past the Senate Carriage Door, and up to the second floor Ohio Clock corridor, just outside the Senate chamber. He arrived there at approximately 2:16 p.m., but soon left and retraced his steps back to the first floor and the Senate Wing Door.

12. At approximately 2:22 p.m., Wood walked away from the police at the Senate Carriage Door, back through the Brumidi Corridors, and south past the Senate Wing Door. Wood then joined the growing number of rioters in the Capitol Crypt. Police officers at that time were attempting to hold them back. Wood was not at or near the front line of the rioters at this time, but he can be seen using his phone as rioters filled the Crypt.

13. By 2:30 p.m., rioters had breached the police line in the Crypt and Wood followed others through the Small House Rotunda, up a staircase by the Memorial Door to the second floor, and into the House Speaker's office suite. While in that area, Wood entered the Speaker's conference room. At approximately 2:36 p.m., Wood entered the Capitol's Grand Rotunda.

14. While in the Rotunda, Wood generally walked around, waved a flag that he found on the ground of the West Lawn of Capitol Grounds, and used his phone. At about 2:37 p.m., Wood went north towards the Senate Chamber, but returned to the Rotunda a minute later, along with a cloud of chemical irritant. At approximately 2:40 p.m., Wood went south out of the Rotunda towards the House chamber. He went down through Statuary Hall—stopping to remove the velvet

rope from each of six stanchions he passed and dropping it to the ground. By 2:46 p.m., Wood and the other rioters returned to the Rotunda, accompanied by a cloud of chemical irritant.

15. Wood then walked from the Rotunda to the foyer between the Rotunda and the doorway that is commonly referred to as the East Rotunda Door. He returned to the Rotunda (2:50 p.m.), went back through Statuary Hall towards the House chamber (2:52-2:54 p.m.), and then returned to the Rotunda. While in the Rotunda, police officers from the Metropolitan Police Department arrived from the south and west Rotunda entrances and formed a line along the western wall of the Rotunda. The police officers then began attempting to funnel the rioters out of the East Rotunda Door.

16. By 3:20 p.m., Wood and other rioters had been forced into the foyer between the Rotunda and the East Rotunda Door. At approximately 3:31 p.m., Wood left the Capitol through the East Rotunda Door.

17. On January 7, 2021, at approximately 8:57 a.m., Wood sent the following iMessage to an individual whose identity is known to the parties:

WOOD: [Name redacted], I'm not okay with my actions yesterday. I took a stand yes but it was extremely inappropriate... it was wrong. My mental state is off the charts. I can't believe I participated in such chaos. What's done is done. But now I must deal with it. I find comfort in it because I worked to stop violent destruction of the property. I was merely there as a citizen making a point. I didn't assault anyone. I didn't participate in the breaking in. I didn't participate in the destruction of property. I walked into, done what I thought was my part. While most of the people in there were just like me, everyday American citizens, there were some that disgraced our entrance and it associated me with them and that churns my stomach.

Elements of the Offenses

18. Matthew Mark Wood knowingly and voluntarily admits to all the elements of 18 U.S.C. § 1512(c)(2) and § 2. Specifically, Wood admits that he attempted to or did impede an official proceeding; that he intended to obstruct or impede the official proceeding; that in doing so he acted knowingly, with awareness that the natural and probable effect of his conduct would be to obstruct or impede the official proceeding; and that he acted corruptly. Wood further admits that the official proceeding he attempted to or did impede was 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.

19. Matthew Mark Wood knowingly and voluntarily admits to all the elements of 18 U.S.C. §§ 1752(a)(1), (2). Specifically, Wood admits that he knowingly entered or remained in a restricted building or grounds without lawful authority to do so, that he knowingly and with the intent to impede or disrupt the orderly conduct of Government business or official functions engaged in disorderly or disruptive conduct in any restricted building or grounds, and that his conduct occurred when, or so that, his conduct in fact impeded or disrupted the orderly conduct of Government business or official functions.

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