

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

UNITED STATES OF AMERICA	:	Case No.: 1:21-CR-00334-TJK
	:	
v.	:	
	:	
KATHARINE HALLOCK MORRISON,	:	18 U.S.C. § 1512(c)(2) and 2
aka KATE	:	
	:	
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, **KATHARINE HALLOCK MORRISON**, 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 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 PM. Shortly thereafter, by approximately 1:30 PM, 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 PM, 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 PM, 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 \$2.7 million dollars for repairs.

7. Shortly thereafter, at approximately 2:20 PM, 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 PM 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 PM 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.

Katharine Hallock Morrison's Participation in the January 6, 2021, Capitol Riot

8. On or about January 6, 2021, the defendant, **KATHARINE HALLOCK MORRISON** drove from her home in Dansville, New York to meet with **Dale Jeremiah Shalvey (Shalvey) and Tara Aileen Stottlemeyer (Stottlemeyer)** in Bentleyville, Pennsylvania where Shalvey and Stottlemeyer lived and worked on their farm. Later on January 6, 2021, defendant traveled with Shalvey and Stottlemeyer to Washington, D.C., via automobile. The purpose of defendant, Shalvey and Stottlemeyer's trip to Washington, D.C., was to protest Congress' certification of the Electoral College. Defendant told Shalvey and Stottlemeyer that she would like to go to D.C. and hear former President Donald Trump speak.

9. On January 6, defendant, Shalvey, and Stottlemeyer attended the Women for Trump rally and then marched with other protestors to the Capitol.

10. At approximately 2:20 p.m. defendant, Shalvey, and Stottlemeyer breached the Capitol, entering the Senate Wing door, and then going to various areas in the Capitol, including, but not limited to the Crypt, the Speaker of the House's Suite, the Rotunda, and the Senate Chamber.

11. Defendant, Shalvey, and Stottlemeyer then went to the third floor of the Capitol. While in the Senate Gallery hallway, Morrison observed Shalvey pick up a bundle of zip ties that were sitting near a metal detector. Shalvey showed the zip ties to Morrison and Stottlemeyer and then discarded them. The trio then went to the Senate Chamber Press Gallery, and back to the second floor. They entered the Senate Chamber at approximately 2:29 p.m. There, defendant, Shalvey, and Stottlemeyer looked through Senators' desks and took pictures of documents that were in and on those desks. Defendant, Shalvey, and Stottlemeyer exited the Senate Chamber at approximately 2:59 p.m. They exited the Capitol building through the Senate Carriage door at approximately 3:05 p.m.

12. Defendant's phone was seized and searched pursuant to a federal search warrant. Defendant recorded a number of videos of activity at the Capitol on January 6, 2021, including, but not limited to, videos of law enforcement outside of the Capitol Building trying to prevent protesters from entering the building, a video of Shalvey and Stottlemeyer on the East Front of the Capitol, a video while Defendant was at the doors of the Senate, a video of a monitor in the Capitol stating that the Senate was in recess, a video in the Senate Chamber while defendant was there with Stottlemeyer and Shalvey, a video showing the contents of a Senator's desk including a letter from Senator Mitt Romney to Vice-President Michael Pence, a video showing a map of the Capitol.

Elements of the Offense

13. Defendant knowingly and voluntarily admits to all the elements of 18 U.S.C. § 1512(c)(2) and 2. Defendant admits that she willfully and knowingly entered the U.S. Capitol Building knowing that she did not have permission to do so. Defendant further admits that while inside the Capitol, she corruptly obstructed, influenced, and impeded 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.

Respectfully submitted,

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

By: /s/Anthony L. Franks
Anthony L. Franks
Assistant United States Attorney
Missouri Bar No. 50217MO

DEFENDANT'S ACKNOWLEDGMENT

I, **Katharine Hallock Morrison**, 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: 9/14/22



Katharine Hallock Morrison
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: 9/14/22



Jeffrey Ciccone
Attorney for Defendant