

**FILED**

**MAY - 6 2022**

Clerk, U.S. District and  
Bankruptcy Courts

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

UNITED STATES OF AMERICA	:	Case No: 21-CR-474-BAH
	:	
v.	:	
	:	40 U.S.C. § 5104(e)(2)(G)
KRISTI MUNN,	:	
	:	
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 Defendant, Kristi Munn, with the concurrence of her attorney, agree and stipulate to the below factual basis for 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

UNITED STATES OF AMERICA KRISTI MUNN, V. 2. IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA of the public. Defendant. 3. Case No: 21-CR-474-BAH 40 U.S.C. § 5104(e)(2)(G) Pursuant to Federal Rule of Criminal Procedure 11, the United States of America, by and through its attorney, the Senate were attending in separate chambers of 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 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 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. 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 \$12. million. 7. 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 facade 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. 8. Defendant, Kristi Munn, was present at the January 6, 2021 Capitol Riot. Defendant traveled with her father, Thomas Munn, mother, Dawn Munn, two sisters, Kayli Munn, and Minor Child "1", and brother, Joshua Munn (hereinafter collectively referred to as her family) from Borger, Texas to Washington, DC to attend the rally for former President Donald Trump. Prior to her trip, Defendant posted a photo of her family with the caption, "Washington D.C. here we come. #StopTheSteal #TrumpIsMyPresident." 10. After the rally, Defendant and her family joined the crowd and walked to the U.S. Capitol. Page 3 of 6 11. While outside on the Capitol grounds, Defendant and her family walked past bike rack fencing that had been pushed aside to allow the crowd through and green plastic fencing that had been knocked down and rolled up. Defendant and her family were exposed to tear gas employed by law enforcement on the grounds and inside the U.S. Capitol. Defendant and her family knew that it was being employed to keep them out of the U.S. Capitol and entered the building and remained inside for approximately 52 minutes. 13. Defendant and her family entered the U.S. Capitol around 2:25 pm by crawling through the window next to the Senate Wing. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, between approximately 2:30 pm and 2:36 pm, where they witnessed others physically engaging with law enforcement. Prior to entering the Visitor's Center, Defendant and her family stopped in the hallway to pick up trash on the floor. 15. Around 2:45 pm, Defendant and her family entered the area near the Memorial Door, heading back toward the Crypt. 16. Around 3:15 pm, Defendant and her family entered Room S-145. Defendant and her family returned outside of the U.S. Capitol around 3:17 pm, crawling back out the window next to the Senate Wing Doors. 18. On January 7, 2021, Defendant wrote on Facebook, "We were in the capital!!" ... "Just keep that bit of info on the DL for right now." The same day, in a conversation with another Facebook user, the Facebook user wrote, "How did anyone even get past the front doors... 'With how secure it is' makes me wonder if they was let in... My own thoughts." Defendant replied, 12. 17. Page 4 of 6: "There was no security" "No national guard!!" anything walking through the capital." 19. Also on January 7, 2021, Defendant posted the following status and follow-up comments on Facebook: "I was just thinking... tear gas tastes like freedom #StopTheSteal #TrumpIsMyPresident." A Facebook user commented, "Do you know this from experience??" Defendant replied, "I do now." Another Facebook user commented, "Did y'all get gassed?" Defendant replied, "They gassed us all. We never fought back! We pushed forward and asked them to join us!! So proud of my Patriots." 20. Defendant knew at the time she entered the U.S. Capitol Building with her family that she and her family did have permission to enter the building and Defendant paraded, demonstrated, or picketed within the U.S. Capitol building with her family. By: "I can promise you no one destroyed Respectfully submitted,

MATTHEW M. GRAVES United States Attorney D.C. Bar No. 481052 /s/ Jennifer M. Rozzoni JENNIFER M. ROZZONI Assistant United States Attorney Page 5 of 6 I, Kristi Munn, 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: 4-29-2022. Date: DEFENDANT'S ACKNOWLEDGMENT ATTORNEY'S ACKNOWLEDGMENT I have read this Statement of the Offense and have 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.

***Kristi Munn's Participation in the January 6, 2021, Capitol Riot***

8. Defendant traveled with her father, Thomas Munn, mother, Dawn Munn, two sisters, Kayli Munn, and Minor Child-1, and brother, Joshua Munn (hereinafter collectively referred to as her family) from Borger, Texas to Washington, DC to attend the rally for former President Donald Trump.

9. Prior to her trip, Defendant posted a photo of her family with the caption, "Washington D.C. here we come . . . #StopTheSteal #TrumpIsMyPresident."

10. After the rally, Defendant and her family joined the crowd and walked to the U.S. Capitol.

11. While outside on the Capitol grounds, Defendant and her family walked past bike rack fencing that had been pushed aside to allow the crowd through and green plastic fencing that had been knocked down and rolled up.

12. Defendant and her family were exposed to tear gas employed by law enforcement on the grounds and inside the U.S. Capitol. Defendant and her family knew that it was being employed to keep them out of the U.S. Capitol and entered the building and remained inside for approximately 52 minutes.

13. Defendant and her family entered the U.S. Capitol around 2:25 pm by crawling through the window next to the Senate Wing Doors.

14. Defendant and her family made their way to the Crypt and continued down to the Visitor's Center between approximately 2:30 pm and 2:36 pm, where they witnessed others physically engaging with law enforcement. Prior to entering the Visitor's Center, Defendant and her family stopped in the hallway to pick up trash on the floor.

15. Around 2:45 pm, Defendant and her family entered the area near the Memorial Door, heading back toward the Crypt.

16. Around 3:15 pm, Defendant and her family entered Room S-145.

17. Defendant and her family returned outside of the U.S. Capitol around 3:17 pm, crawling back out the window next to the Senate Wing Doors.

18. On January 7, 2021, Defendant wrote on Facebook, "We were in the capital !!" ... "Just keep that bit of info on the DL for right now." The same day, in a conversation with another Facebook user, the Facebook user wrote, "How did anyone even get past the front doors... 'With how secure it is' makes me wonder if they was let in... My own thoughts." Defendant replied,

“There was no security” ... “No national guard !!” ... “I can promise you no one destroyed anything walking through the capital.”

19. Also on January 7, 2021, Defendant posted the following status and follow-up comments on Facebook: “I was just thinking... tear gas tastes like freedom #StopTheSteal #TrumpIsMyPresident.” A Facebook user commented, “Do you know this from experience??” Defendant replied, “I do now.” Another Facebook user commented, “Did y’all get gassed?” Defendant replied, “They gassed us all. We never fought back ! We pushed forward and asked them to join us !! So proud of my Patriots.”

20. Defendant knew at the time she entered the U.S. Capitol Building with her family that she and her family did have permission to enter the building and Defendant paraded, demonstrated, or picketed within the U.S. Capitol building with her family.

Respectfully submitted,


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

By: /s/ Jennifer M. Rozzoni  
JENNIFER M. ROZZONI  
Assistant United States Attorney

**DEFENDANT'S ACKNOWLEDGMENT**

I, *Kristi Munn*, 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: 4-29-2022

  
\_\_\_\_\_  
KRISTI MUNN  
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: 4/29/2022

  
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SHELLI PETERSON  
Attorney for Defendant