

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

UNITED STATES OF AMERICA

Case No: 23cr195

v.

CORINNE LEE MONTONI

Defendant.

*Let this be filed.
Rogee C. Falletta
U.S. 6/26/23*

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, CORINNE LEE MONTONI, with the concurrence of her 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:

Statement of Facts

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 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. 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.

MONTONI's Participation in the January 6, 2021, Capitol Riot

8. On January 6, 2021, at approximately 3:07 p.m., CORINNE LEE MONTONI unlawfully entered the Capitol building through a broken door next to the Senate Wing Door on the West side of the Capitol. The door and two adjacent windows had been damaged shortly before MONTONI's arrival at the entrance. As she entered, a large group of people also entered through the door, while others entered through the broken windows. MONTONI proceeded through the Capitol building until she reached the Capitol crypt.

9. On January 6, 2021, while inside and around the Capitol, MONTONI took several videos with her cell phone, including the following:
 - a. On January 6, 2021, MONTONI posted a video on her Parler account in which she appears outside the Capitol building, wearing a gray “Trump” sweatshirt and a blue hat with the words “Make America Great Again.” She says, “Okay they breached the Capitol. Pence refused to hear the objections and now we surrounded the Capitol building. This is nuts.”
 - b. On January 6, 2021, MONTONI posted a video on her Instagram account in which she appears inside the Capitol building with other protestors in the background. She is wearing the same “Trump” sweatshirt and says, “We’re in the Capitol cuz this is our house – we paid for this, and they’re trying to steal it from us. Let’s go!”
 - c. On January 6, 2021, MONTONI posted a video on her Parler account which shows a large crowd of protestors jammed inside a hallway of the Capitol building. A group of protestors appear to be pushing against a line of police officers, while other protestors scream, “Push!” MONTONI shouts, “We paid for this!”, and then joins the crowd in chanting “U.S.A.” repeatedly. Members of the crowd who are at the end of the hallway appear to react to pepper spray and can be heard yelling to other members of the crowd to “clear a path.” Several crowd members on seen moving away from the end of the hallway as they rub their eyes.
10. While inside a hall of the Capitol Building, MONTONI was in the midst of a crowd, surrounded by other rioters. She and the crowd were pushing against officers who were attempting to stop them from proceeding. She yelled “Push back! Push back!” in support of the crowd in a

video recording that she contemporaneously made. Officers were deploying pepper spray at the time, and individuals in the vicinity of MONTONI were sprayed.

11. MONTONI remained inside the U.S. Capitol building for approximately 10 minutes. Upon learning that the police were responding to remove the protestors from the Capitol, she exited the Capitol building through the same doorway she entered. She briefly reentered the Capitol building on at least one occasion despite being aware that the police were attempting to remove the protestors from the building. Her re-entry into the U.S Capitol was approximately five minutes or less.

12. MONTONI also made several related social media posts before, during, and after the attack on the Capitol, including:

- a. On December 15, 2020, MONTONI posted on Instagram, “Trump is our leader. This is not over yet. January 6th is the day to keep an eye on and if that doesn’t work, we will be in DC on the 20th letting the world know we REJECT progressive liberalism.”
- b. In a December 16, 2020 private Facebook chat with an individual, the individual stated, “Getting close,” to which MONTONI replied, “To what...The revolution?”
- c. On December 16, 2020, MONTONI posted on Parler, “Insurrection Act coming in hot.. void the fraudulent 2020 election, arrest these traitors and restore order and faith in our justice department. GitMo is readyyyyyyy [sic]”.
- d. On December 25, 2020, MONTONI discussed with an individual on Facebook plans to travel to Washington, DC for the January 6, 2021 rally. The individual stated, “Well still have a good time [sic]... And do our patriotic duty”. MONTONI agreed, “Yup!... It better be a Trump victory party,” to which the individual stated,

“Or were going to fucking WAARRRRR party... Wooh!”. MONTONI agreed, “Yupppppp”.

- e. On December 28, 2020, MONTONI posted to her Parler account, “If Pence betrays us, we riot.” On December 29, 2020, she posted, “January 6th in DC is going to be YUGEEEE! It’s either going to be a Trump victory party or the first real day of the revolution. Who’s going?!”
- f. On January 5, 2021, MONTONI posted to her Parler account, “DC bound see ya there Revolutionists!” At times throughout the day of January 6, 2021, MONTONI posted: “WE BREACHED THE CAPITOL OMG”; “Insurrection is coming. Hold the line. Stay vigilant.”; “Storming the Capitol to take back our country from traitors! This is OUR HOUSEEEEE!”; and “Here’s a pretty little view from inside the Capitol at our traitor DC police, with a smashed window. Congratulations to them, they got both sides to hate them.”
- g. On January 6, 2021, MONTONI posted to her Facebook account, in part: “We are DONE with these traitors. Today, we showed them how done we are. The Capitol building belongs to US, we the people. This is our house... We broke a few windows, sure but we were a peaceful protest occupying the people’s property. Maybe we should have burned down and looted a Walmart in the name of ‘justice’ and the media would have called it a ‘peaceful protest.’ Fuck traitors. Fuck the biased media. We are DONE letting corruption run wild.” Additionally, in a January 6, 2021 private chat, in which MONTONI was asked “Did you break in or just go instead the halls to protest peacefully,” MONTONI replied “Obv broke in

because it was locked. They had to breach the gates first [sic]... We didn't do anything destructive except break the window."

- h. On January 6, 2021, MONTONI posted on Parler, "Insurrection is coming. Hold the line. Stay vigilant." On January 7, she stated, "If you have a problem with American citizens occupying a building WE OWN, but not a problem with the massive voter fraud and stolen election, you are the enemy."
- i. On January 6, 2021, commenting on her actions inside the Capitol, MONTONI stated on Parler, "We do not want civilians. We do not even want most of the cops. We want the TRAITOR POLITICIANS. This is not a civil war. This is a revolution." On January 7, MONTONI again asserted her belief that U.S. politicians were traitors that she had intended to forcibly remove from the Capitol, when stating, "How so? Traitors still occupy our federal buildings. We didn't win yet."
- j. During a January 7, 2021, private chat on social media regarding her participation in the riot, MONTONI told a Facebook contact, "Hahah yeah it was so fun. But they did pepper spray us."
- k. On January 7, 2021, in a private Facebook chat, MONTONI reported, "Now people are like. You're going to jail...Ok so they're gonna arrest the 1000 people that went in...Ok [sic]". The friend stated, "Girlll I was going to tell you to delete it but I didn't even have a chance because I was dealing with this damn baby... I'm watching a ton of videos from patriots being in lockdown right now [sic]". MONTONI replied, "Yeah I'm glad I did... Haha yup we wanted ANTIFA". During the same chat session, a friend of MONTONI stated, "Oh my gosh!!! I

would've loved that! But I'm so glad y'all got out of there and you deleted that video!"

l. On January 10, 2021, MONTONI stated in a private Facebook chat, "I deleted Facebook so I don't think I can watch videos on there anymore".

m. On January 22, 2021, MONTONI stated in a private Facebook chat that she planned to delete her Facebook Messenger and move to just text messaging.

13. MONTONI knew at the time she entered the U.S. Capitol building that she did not have permission to enter the building.

14. MONTONI admits to all the elements of 18 U.S.C. § 231(a)(3). Specifically, MONTONI admits that she obstructed, impeded, or interfered with law enforcement officers lawfully engaged in the lawful performance of their official duties incident to and during the commission of a civil disorder which adversely affected commerce and the performance of a federally protected function.

Respectfully submitted,

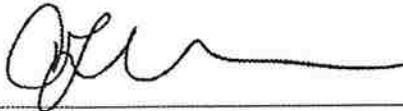
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DEFENDANT'S ACKNOWLEDGMENT

I have read this factual proffer and have discussed it with my attorney, Bernard F. Crane, Esquire. I fully understand this factual proffer. I agree and acknowledge by my signature that this proffer of facts 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 factual proffer fully.

Date: 6/5/23




Corinne Lee Montoni
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this factual proffer and have reviewed it with my client fully. I concur in my client's desire to adopt this factual proffer as true and accurate. To my knowledge, my client's decision to agree to and adopt this factual proffer is an informed and voluntary one.

Date: 6/6/23



Bernard F. Crane, Esquire
Counsel for the Defendant