

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

<b>UNITED STATES OF AMERICA</b>	:	<b>Criminal Case No. 22-cr-338 (DLF)</b>
	:	
<b>v.</b>	:	
	:	
<b>TRACI ISAACS,</b>	:	<b>18 U.S.C. § 1512(c)(1) and 2</b>
	:	
<b>Defendant.</b>	:	

**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, Traci Isaacs, 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:

***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 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 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 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.

***Participation by Traci Isaacs in the January 6, 2021, Capitol Riot and Obstruction***

8. The defendant, Traci Isaacs, lives in St. Cloud, Florida. On January 4, 2021, the defendant left her home in Florida and traveled to Washington, D.C. with Luis Hallon, William Isaacs, and Leslie Gray.

9. The defendant was a member of the Oath Keepers on January 6, 2021. On January 6, 2021, and in the days prior and following, the defendant participated in a Signal group chat titled “OK FL DC OP Jan 6” with other Oath Keeper members, in which the defendant communicated under the username “Shelby Cobra” about the events on January 6, 2021 at the U.S. Capitol.

10. On the morning of January 6, 2021, the defendant texted: “We are gonna check in with Oath Keepers at the Capitol Building.” The defendant and Luis Hallon then proceeded to

the Capitol where they joined in the protest of Congress' certification of the Electoral College outside the East Front of the Capitol.

11. The defendant and Luis Hallon initially joined the crowd gathered at the perimeter of the East Front of the Capitol's restricted perimeter, and they chanted and yelled at the officers who had the area barricaded. After about 1 hour of protests, the defendant joined the group of protesters in surging forward and advancing past the barricades and up to the steps on the East Front of the Capitol. Although the USCP gave orders for the crowd to stop, the crowd advanced up the steps of the Capitol, including the defendant. The defendant then observed law enforcement officers physically engage with the crowd and deploy tear gas in an effort to disperse the crowd. The defendant and Luis Hallon were among those who were tear gassed by the USCP on the East Front steps of the Capitol, which caused their eyes to burn. At approximately 2:50 PM, the defendant messaged the Oath Keeper group chat on Signal that she "got tear gassed good."

12. The defendant and Luis Hallon entered the Capitol at approximately 3:02 PM through the Columbus Doors on the East Front of the Capitol. Despite the efforts of law enforcement, the Columbus Doors had been forced open by other individuals.

13. While inside the Capitol, the defendant and Luis Hallon took photographs and videos on their cellphones and walked through the Rotunda.

14. While inside the Rotunda between 3:05 PM and 3:15 PM, the defendant observed USCP and other law enforcement officers actively work to clear the Rotunda of the crowd with verbal orders and physical force.

15. The defendant and Luis Hallon exited the Capitol through the East Front Columbus Doors at 3:16 PM, after remaining inside the Capitol for approximately 14 minutes.

16. On or about January 9, 2021, the defendant was aware that she had been reported to the FBI for her actions relating to January 6, 2021.

17. On or about January 16, 2021, the FBI encountered the defendant regarding the events of January 6, 2021.

18. Starting on January 7, 2021, and continuing through January 25, 2021, the defendant deleted and attempted to delete from her cellphone text messages, photos, videos and other evidence relating to January 6, 2021, and also instructed others to delete similar records in an effort to frustrate the FBI's investigation into the events at the U.S. Capitol on January 6, 2021.

19. The following text messages were among the items deleted by the defendant from her cellphone:

- a. A January 7, 2021, text message from the defendant to an individual stating: "Did you delete that video" and "We are all Oathkeepers..." and "It was glorious but kinda fucked up. We should have done this differently. We should have occupied the Capitol with demands."
- b. A January 9, 2021, text message from the defendant to an individual stating: "We are probably OK but were part of the Capitol Riot and I got reported to the FBI."
- c. A January 10, 2021, text message from the defendant to an individual stating: "Delete anything I sent you please. Feds are going after people hard."
- d. A January 12, 2021, text message from the defendant to Leslie Gray stating: "Girl I almost had a heart attack last night. FBI keep putting up more pictures and for a second, I thought one was me..."

- e. A January 14, 2021, text message from the defendant to her nephew William Isaacs to “get a new SIM card” for his cellphone, to which he responded, “Do I work on scrubbing evidence or do I do school.”
- f. A January 25, 2021, text message from the defendant to Luis Hallon about checking their phones/videos for conduct inside the Capitol

20. The defendant deleted or attempted to delete over 100 text messages from her cellphone relating to the events on January 6, 2021. She also deleted her Oath Keeper “contacts” from her cellphone. In addition, the defendant also deleted or removed from Facebook her post that included a photo of the defendant at the Capitol on January 6, 2021.

***Elements of the Offense***

21. The defendant, Traci Isaacs, knowingly and voluntarily admits to all the elements of 18 U.S.C. § 1512(c)(1), Altering, Destroying, Mutilating, or Concealing a Record, Document, or Other Object. Specifically, the defendant admits that she knowingly and corruptly altered, destroyed, or concealed a record, document, or other object, and attempted to do so, when she deleted text messages, photos and videos from her cellphone that were related to the events at the U.S. Capitol on January 6, 2021, and that she instructed others to delete similar records. The defendant further admits that in doing so, she acted with the intent to impair the integrity and availability of these records and objects from use in an official proceeding, that is, the FBI investigation and grand jury investigation into the events at the U.S. Capitol on January 6, 2021.

Respectfully submitted,

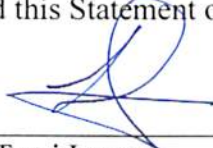
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DEFENDANT'S ACKNOWLEDGMENT

I, Traci Isaacs, 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.

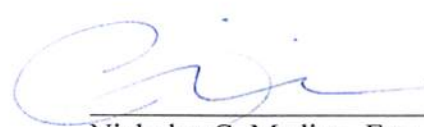
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Traci Isaacs  
Defendant

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: 3/13/2023

  
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Nicholas G. Madiou, Esq.  
Michael E. Lawlor, Esq.  
Attorneys for Defendant