

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No: 22-CR-233 (ABJ) (03)
	:	
v.	:	
	:	18 U.S.C. § 1752(a)(1)
DYLAN R. CRONIN	:	18 U.S.C. § 1361
	:	
Defendant.	:	

**FILED**

**FEB 24 2023**

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

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, ~~Kevin M.~~ <sup>DYLAN R.</sup> Cronin, 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 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.

A handwritten signature or set of initials, possibly 'DC', written in black ink in the bottom right corner of the page.

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.

***Dylan R. Cronin's Participation in the January 6, 2021, Capitol Riot***

8. Defendant, Dylan R. Cronin (Dylan), who lives in Puyallup, Washington, traveled to Washington, D.C. on January 6, 2021, with his co-defendant father Kevin M. Cronin (Cronin) and co-defendant brother Kevin M. Cronin II (Kevin). Dylan entered the restricted area of the U.S. Capitol grounds in the early afternoon of January 6, 2021.

9. Dylan made his way to the west side of the grounds, then up the Northwest Staircase to the Upper West Terrace. Dylan and a group of other rioters participated in the first breach of the U.S. Capitol building at the Senate Wing door. At approximately 2:12 p.m., Dylan kicked the exterior of the Senate Wing door. Less than one minute later, Dylan used a piece of lumber to break the lower right pane of glass of a window to the right of the exterior Senate Wing door.

10. The Architect of the Capitol has estimated the cost to repair the windowpane damaged by Dylan was \$774. The window is property of the United States.

11. At approximately 2:13 p.m., Dylan entered the U.S. Capitol building through the left windowpane adjacent to the right windowpane that he broke, as alarms sounded. The government estimates that Dylan was the thirteenth rioter to enter the U.S. Capitol building on January 6.

12. Upon entry, Dylan waited inside the Senate Wing door, which had been breached by other rioters. There, Dylan was met with his brother Kevin and father Cronin when they entered the U.S. Capitol building.

13. Dylan knew at the time he entered the U.S. Capitol building and joined codefendants Kevin and Cronin that neither he nor they had authority to do so and that the building was restricted.

14. Dylan, Cronin, and Kevin made their way further into the U.S. Capitol building towards the U.S. Senate side for about five minutes, and then returned by the same route. At about 2:20 p.m., Dylan, Cronin, and Kevin left the U.S. Capitol building.

15. At approximately 2:24 p.m., Kevin and Dylan reentered the U.S. Capitol building through the Senate Wing door. They travelled further into the building together to the Crypt, the Memorial Door, and Statuary Hall. At about 2:35 p.m., Kevin and Dylan separated. Kevin turned around and returned by the same route, exiting the building at approximately 2:38 p.m.

16. Dylan continued further into the U.S. Capitol building on the U.S. House of Representatives side to East Front Upper House door. At about 2:46 p.m., Dylan exited the Capitol through that door and briefly remained outside.

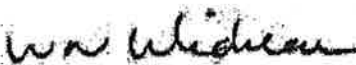
17. At approximately 2:48 p.m., Dylan reentered the Capitol through the East Front Upper House door. Dylan remained inside the entryway, where officers with the Metropolitan Police Department formed a line preventing rioters from venturing further in the Capitol building.

At approximately 2:56 p.m., Dylan left the U.S. Capitol building through the East Front House door and did not reenter.

Respectfully submitted,

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

By:



Will N. Widman  
Trial Attorney  
NC Bar No. 48158





DEFENDANT'S ACKNOWLEDGMENT

I, Dylan R. Cronin, 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.

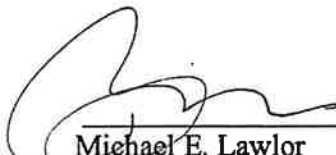
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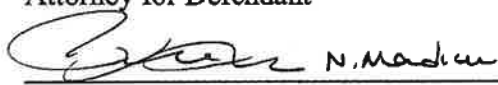
  
\_\_\_\_\_  
Dylan R. Cronin  
Defendant

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: 1/23/2023

  
\_\_\_\_\_  
Michael E. Lawlor  
Attorney for Defendant

  
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Nicholas G. Madiou  
Attorney for Defendant