

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No.: 22-CR-00017-TFH
	:	
v.	:	40 U.S.C. § 5104(e)(2)(G)
	:	
JOHN M. CAMERON,	:	
	:	
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, JOHN M. CAMERON, 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 \$1.4 million dollars for repairs.

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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.

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

8. The defendant, JOHN M. CAMERON, lives in Port Orchard, Washington. On January 5, 2021, defendant traveled by airplane from his home in Washington State to Washington, D.C. The purpose of the defendant's trip to Washington, D.C., was to prevent or protest Congress' certification of the Electoral College, and to post about his experience on social media for his "readers/followers," some of whom offered to help fund his trip.

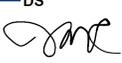
9. On January 5, 2021, defendant posted to his Twitter account, "PATRIOT Party in DC. Trump March with all of us MAGA supporters. Protest against the steal and support election integrity. #StopTheSteal."

10. On January 6, defendant attended the "Stop the Steal" rally near the White House, and then marched with other protestors to the Capitol. He made his way to the West Lawn, into the restricted U.S. Capitol grounds. There, he observed individuals scaling the walls to reach the

Upper West Terrace, and he posted video to his Twitter account, with the comment, “No violence, but some damage.” He posted similar images to his Facebook account, with the comment, “The wall was breached.” Defendant followed the mob up the stairs of the U.S. Capitol to the Upper West Terrace. He recorded a video of himself just outside to door, saying, “Civil disobedience has kicked in. ... You can judge, we all can judge, whether this is illegal or not. But if this is what it takes to be heard, because our votes aren’t, then this is what happens.”

11. At approximately 2:23 PM, about 10 minutes after rioters first breached the U.S. Capitol building through broken windows next to the Senate Wing Doors and then forced the doors open, defendant entered the U.S. Capitol building through the Senate Wing Doors. He briefly entered an office suite on the first floor. He then made his way to the Crypt where he joined a large mob chanting “Stop the Steal” and attempting to push through to access the rest of the building. Defendant walked to the east side of the building near the Memorial Doors, and back through the Crypt to the Senate Wing Doors, where he exited, at the direction of law enforcement, through a broken window at approximately 2:42 PM.

12. While he was inside the building, defendant filmed video with his cell phone and documented his and other rioters’ activities. At around 2:30 pm, he messaged his wife, “The Capitol building got stormed.” Just before defendant left the building, an online associate told him, “Cspan says capital is under siege. You GO PATRIOTS!!!!!!!!” Defendant responded, after he had left the building, with a photo of a smoky interior hallway in the Capitol, and the note, “Tear gas[.]” At around 2:47 PM, a few minutes after exiting the building, he told his wife, “Got kicked out and tear gassed.” Defendant debated whether he should publicly post his footage of the interior of the building, and asked his online associates to keep the interior videos or photos he shared “on the DL,” that is, not to distribute or discuss them.

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13. Defendant remained on restricted grounds at the U.S. Capitol for another hour or so, until about 3:50 PM, even after he had been “tear gassed” and “kicked out.” After leaving the area, he discussed the experience and shared photos and videos with his followers on social media. That afternoon, he posted a self-narrated video to his Facebook page in which he noted that a lot of people were commenting on the videos he posted. He described the event as peaceful and safe. He acknowledged that he had seen a couple of doors “get kicked in or whatever,” but claimed he had been in crazy snowball fights that involved more destruction and vandalism. He described the riot he had just left as a “fun, exciting, interesting, historic event.”

*Elements of the Offense*

14. JOHN M. CAMERON knowingly and voluntarily admits to all the elements of Parading, Demonstrating, and Picketing in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(G). Specifically, defendant admits that he willfully and knowingly paraded, demonstrated, and picketed inside the U.S. Capitol Building.

Respectfully submitted,

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

By:

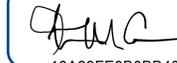
  
\_\_\_\_\_  
EMILY W. ALLEN  
Assistant United States Attorney  
Cal. Bar No. 234961

**DEFENDANT’S ACKNOWLEDGMENT**

I, JOHN M. CAMERON, 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: 5/2/2022 | 9:24:58 PM PDT

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JOHN M. CAMERON  
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: 5/3/2022 | 7:49:08 AM PDT

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D. ANGUS LEE  
Attorney for Defendant