

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.: 21-CR-
	:	
v.	:	MAGISTRATE NO. 21-MJ-53
	:	
CHRISTINE PRIOLA,	:	18 U.S.C. § 1512(c)(2)
:	:	
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 the defendant, CHRISTINE PRIOLA, 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 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 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.

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

8. On or about January 6, 2021, PRIOLA traveled by chartered bus from her residence in Willoughby, Ohio, to Washington, D.C., arriving in Washington on January 6, 2021. PRIOLA then made her way to the U.S. Capitol grounds. PRIOLA was carrying a large sign reading, “WE THE PEOPLE TAKE BACK OUR COUNTRY” on one side and “THE CHILDREN CRY OUT FOR JUSTICE” on the other side.

9. Once at the Capitol grounds, PRIOLA joined a crowd of people lined up behind the security barriers and facing U.S. Capitol Police officers. At some point, PRIOLA entered the restricted area on the east side of the building, joined the front lines of the riot, and climbed the

steps to the Capitol building. People in the crowd were yelling, “Stop the Steal” and “Who’s our President? Trump!”, among other things.

10. PRIOLA ultimately entered the Capitol building by way of the East Rotunda (Columbus) doors. She did so soon after the first protesters overcame U.S. Capitol Police officers guarding that entrance to the building. While inside the building, PRIOLA appeared on camera and gave a false name to an individual who was filming. PRIOLA was inside the U.S. Capitol for approximately 30 minutes.

11. While inside the Capitol, PRIOLA made her way to the Senate chamber and entered the restricted floor area of the chamber. PRIOLA was in the Senate chamber for approximately 10 minutes. While in the Senate chamber, PRIOLA carried a sign or banner that was not authorized to be carried in the chamber—the sign described above in paragraph 8. She also made a number of telephone calls, including one to an associate who was outside the building. PRIOLA told this associate that she believed she was in the Senate and that he needed to come inside. PRIOLA took photographs and videos inside the chamber using her cell phone.

12. After exiting the building and rejoining her traveling companions, PRIOLA told another associate that PRIOLA had been pepper sprayed.

13. At the time of the Capitol riots, PRIOLA was employed with the Cleveland Metropolitan School District (CMSD). PRIOLA resigned from her position with the CMSD in a letter dated January 7, 2021.

14. Sometime between January 6 and January 12, 2021, PRIOLA deleted from her cellular telephone data for photos, videos, chats, and messages from approximately January 4 through January 7, 2021.

15. PRIOLA attempted to, and did, corruptly obstruct, influence, and impede an official proceeding, that is, a proceeding before Congress, specifically, Congress's certification of the Electoral College vote as set out in the Twelfth Amendment of the Constitution of the United States and 3 U.S.C. §§ 15-18.

Respectfully submitted,

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

By: /s/ Jolie F. Zimmerman
Jolie F. Zimmerman
Assistant United States Attorney

DEFENDANT'S ACKNOWLEDGMENT

I, Christine Priola, 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: 7-12-2022

Christine Priola
Christine Priola
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: 7-12-22

Charles Langmack
Charles Langmack
Attorney for Defendant