

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

Holding a Criminal Term

Grand Jury Sworn in on January 8, 2021

UNITED STATES OF AMERICA

v.

KELLYE SORELLE,

Defendant.

: CRIMINAL NO.
:
: VIOLATIONS:
:
: COUNT 1:
: 18 U.S.C. § 1512(k)
: (Conspiracy to Obstruct an Official
: Proceeding)
:
: COUNT 2:
: 18 U.S.C. §§ 1512(c)(2), 2
: (Obstruction of an Official Proceeding and
: Aiding and Abetting)
:
: COUNT 3:
: 18 U.S.C. § 1752(a)(1)
: (Entering and Remaining in a Restricted
: Building or Grounds)
:
: COUNT 4:
: 18 U.S.C. § 1512(b)(2)(A)-(B)
: (Obstruction of Justice—Tampering with
: Documents)

INDICTMENT

The Grand Jury charges that:

COUNT ONE
(18 U.S.C. § 1512(k))
(Conspiracy to Obstruct an Official Proceeding)

From in and around December 2020, through in and around January 2021, in the District of Columbia and elsewhere, **KELLYE SORELLE** did knowingly combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to corruptly obstruct, influence, and impede an official proceeding, that is, 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, in violation of Title 18, United States Code, Section 1512(c)(2).

(In violation of Title 18, United States Code, Section 1512(k))

COUNT TWO
(18 U.S.C. §§ 1512(c)(2), 2)
(Obstruction of an Official Proceeding and Aiding and Abetting)

On or about January 6, 2021, within the District of Columbia and elsewhere, **KELLYE SORELLE** 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, and did aid and abet others known and unknown to the Grand Jury to do the same.

(In violation of Title 18, United States Code, Sections 1512(c)(2), 2)

COUNT THREE
(18 U.S.C. § 1752(a)(1))
(Restricted Building or Grounds)

On or about January 6, 2021, in the District of Columbia, **KELLYE SORELLE** did knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off, and otherwise restricted area within the United States Capitol and its grounds, where the Vice President was temporarily visiting, without lawful authority to do so.

(In violation of Title 18, United States Code, Section 1752(a)(1))

COUNT FOUR
(18 U.S.C. § 1512(b)(2)(A)-(B))
(Obstruction of Justice—Tampering with Documents)

On or about January 7, 2021, in the District of Columbia and elsewhere, **KELLYE SORELLE** did corruptly persuade and attempt to corruptly persuade other persons with intent to cause and induce such persons to (A) withhold records, documents, and other objects from an official proceeding, that is, the Grand Jury investigation into the attack on the United States Capitol on January 6, 2021, and (B) alter, destroy, mutilate, and conceal objects with intent to impair the objects' integrity and availability for use in such a Grand Jury investigation.

(In violation of Title 18, United States Code, Section 1512(b)(2)(A)-(B))

A TRUE BILL:

FOREPERSON.



MATTHEW M. GRAVES
ATTORNEY FOR THE UNITED STATES
IN AND FOR THE DISTRICT OF COLUMBIA