

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-429-CRC
	:	
SAVANNAH DANIELLE MCDONALD,	:	40 U.S.C. § 5104(e)(2)(G)
	:	
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 defendant, Savannah Danielle McDonald, with the concurrence of her attorney, agree and stipulate to the below factual basis for her 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 separate chambers of 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.

Savannah McDonald's Participation in the January 6, 2021, Capitol Riot

8. On January 6, 2021, Savannah McDonald and Nolan Kidd entered the U.S. Capitol at approximately 2:16 pm through the Senate Fire Door.

9. McDonald and Kidd remained inside the Capitol for approximately 40 minutes walking through various areas inside, including walking past the Senate Carriage Doors and taking the elevator to the third floor. McDonald and Kidd also stood/sat in the second-floor hallway outside of the Senate chambers for approximately 30 minutes.

10. McDonald and Kidd exited the Capitol at 2:55 pm.

11. On January 14, 2021, Federal Bureau of Investigation (“FBI”) agents interviewed McDonald. During the interview, McDonald admitted that she was tear gassed three times prior

to her and Kidd's entry into the U.S. Capitol. McDonald further admitted that she and Kidd both entered the Capitol. McDonald further told FBI that she had posted pictures of January 6 in her Snapchat account but had since deleted her account.

12. However, in a subsequent search warrant to Snapchat, FBI learned that McDonald did not delete her account and engaged in group chats with Kidd where the two discussed entering the Capitol on January 6. On January 7, 2021, in a group chat, Kidd stated, "Me and Savannah are FUCKING STORMTROOPERS. Maybe bout top 15 people . . . We weren't just there we went farther than almost anyone into the building."

13. In a Snapchat video taken inside of the U.S. Capitol on January 6, McDonald stated to the camera, "I'm the only girl that made it into the Senate." In a group chat on January 7, McDonald stated, "Look. Everything needs to be deleted and stopped being shared! So let's make sure anyone it was sent to is asked to delete it."

14. McDonald knew at the time she entered the U.S. Capitol Building that that she did not have permission to enter the building, and McDonald paraded, demonstrated, or picketed.

Respectfully submitted,


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DEFENDANT'S ACKNOWLEDGMENT

I, Savannah Danielle McDonald, 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.

Jan 14, 2022
Date: _____




Savannah Danielle McDonald
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.

Jan 14, 2022
Date: _____



Tim Saviello
Attorney for Defendant