

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

UNITED STATES OF AMERICA	:	Case No: 22-cr-00041 (APM)
	:	
v.	:	40 U.S.C. § 5104(e)(2)(G)
	:	
PAUL LEE SEYMOUR, JR.	:	
	:	
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, John Juran, 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 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 \$2.7 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.

Paul Lee Seymour, Jr.'s Participation in the January 6, 2021, Capitol Riot

8. On or about January 5, 2021, defendant Paul Lee Seymour, Jr. traveled with his father, co-defendant Paul Lee Seymour, Sr., by automobile from Ohio to Washington, D.C. The purpose of the trip to Washington, D.C. was to protest Congress' certification of the Electoral College.

9. Paul Lee Seymour, Jr. and Paul Lee Seymour, Sr. (collectively, "the Seymours") attended President Trump's "Stop the Steal" rally and then marched with other protestors to the Capitol.

10. According to location data for Paul Lee Seymour, Jr.'s cell phone, the Seymours arrived at the Capitol building at approximately 2:40 p.m. The Seymours stood outside the

building for a period of time looking for an entrance. The Seymours saw police officers were kicking people out of the building, rather than letting people into the building. Later, they saw an entrance that was unguarded by police officers and joined other individuals and walked into the Capitol through that door.

11. The Seymours entered the Capitol through the Senate Wing Door at approximately 3:09 p.m.

12. The Seymours were in the Crypt of the Capitol from approximately 3:15 until 3:32 p.m.

13. While inside the Capitol, the Seymours also traveled to Statuary Hall and posed together for a photograph taken by an unknown individual in front of the Robert E. Lee statue.

14. At approximately 3:33 p.m., police officers told the Seymours to leave and escorted them and others out of the building through the Chestnut-Gibson Memorial Doors on the southeast side of the building.

15. After exiting the Capitol, the Seymours stayed on the Capitol Grounds for hours. At approximately 5:35 p.m., Paul Lee Seymour, Jr. stood with a Trump flag on the Upper Terrace West and communicated with other protestors.

Elements of the Offense

16. Paul Lee Seymour, Jr. knowingly and voluntarily admits to all the elements of 40 U.S.C. § 5104(e)(2)(G). Specifically, he admits that he willfully and knowingly entered the U.S. Capitol Building knowing that that he did not have permission to do so. He further admits that

while inside the Capitol, defendant willfully and knowingly paraded, demonstrated, or picketed.

Respectfully submitted,

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

By: /s/ Anita Eve
Anita Eve
Assistant United States Attorney
PA Bar No. 45519



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DEFENDANT'S ACKNOWLEDGMENT

I, Paul Seymour Jr, 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: 6/22/22

Paul Lee Seymour, Jr.
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: June 23, 2022

Nathan I. Silver II
Attorney for Defendant

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