

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

<b>UNITED STATES OF AMERICA</b>	:	<b>Case No.: 22-CR-62 (JMC)</b>
	:	
<b>v.</b>	:	<b>40 U.S.C. § 5104(e)(2)(D)</b>
	:	
<b>RAECHEL GENCO,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	

**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, Raechel Genco, 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 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.

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.

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

8. The defendant lives in the Middle District of Pennsylvania. In early January 2022, she made plans with a friend to travel to Washington, D.C. to attend the Save America rally on January 6, 2021. On January 4, 2022, she exchanged text messages with her friend about trip planning.

9. On January 6, 2022, the defendant and her friend travelled by automobile from Pennsylvania to Washington, D.C. They attended the Save America rally on the Ellipse. Before the rally concluded, the defendant and her friend joined a crowd that walked to the U.S. Capitol.

10. At approximately 12:45 p.m., the defendant and her friend joined a crowd gathered to the west of the U.S. Capitol around the Peace Monument (commonly referred to as the Peace Circle by U.S. Capitol Police officers), located in the Pennsylvania Avenue and First Street NW roundabout. Members of the crowd at the Peace Circle shouted

“1776” and chanted “USA!” The defendant and the crowd then moved southeast along the sidewalk, commonly referred to by U.S. Capitol Police Officers as the Pennsylvania Avenue walkway, that connects the Peace Circle to the U.S. Capitol building. The crowd walked over barricades designed to close the sidewalk access to and maintain a buffer zone from the U.S. Capitol Grounds perimeter fence line. This fence line was intended to keep the public away from the Capitol building and the Congressional proceedings underway inside. The fence line was manned by uniformed U.S. Capitol Police Officers and was constructed with metal bike rack barriers, physically linked end to end, and reinforced with dark colored plastic mesh safety fencing affixed behind the metal bike racks. The fence line was clearly marked with large white “AREA CLOSED” signs affixed to the fencing with bold red lettering.

11. At approximately 12:50 p.m., the defendant’s friend and another individual led the crowd up to the fence line and over a barricade. The defendant followed as part of a crowd. The defendant was not authorized to enter or remain on the U.S. Capitol grounds. The defendant did not submit to security screenings or weapons checks by U.S. Capitol Police officers or other authorized security officials prior to entering the grounds.

12. The defendant’s friend became visibly agitated and confrontational with officers standing behind metal bike racks placed to prevent further movement through the Capitol grounds. The defendant’s friend assumed an aggressive posture and began a series of attempts to tear down the bike racks. He was able to smash a bike rack to the ground. Other members of the crowd began to attack other portions of the barrier and fight with officers. The barrier was eventually leveled and officers were forced to retreat as the crowd surged past. The defendant joined the crowd surging past the toppled barrier and proceeded through the Capitol grounds to another bike

rack barrier where officers had regrouped. The crowd again forced officers to retreat, this time to the West Plaza area of the Capitol grounds.

13. The defendant formed part of the crowd at West Plaza, where she carried a dark flag and walked near and parallel to bike racks that separated a line of Capitol police officers from that crowd.

14. On January 7, 2022, the defendant texted a message to her friend commenting that “I cannot believe how all the republicans in the senate turned against Trump.”

*Elements of the Offense*

15. Defendant Raechel Genco knowingly and voluntarily admits to all the elements of disorderly conduct in the grounds of the U.S. Capitol, in violation of 40 U.S.C. § 5104(e)(2)(D). Specifically, defendant admits that she engaged in disorderly conduct in any grounds of the U.S. Capitol on January 6, 2022, and that she engaged in such actions with the intent to impede, disrupt or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress.

Respectfully submitted,

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

By:



Karen Rochlin  
Assistant United States Attorney  
D.C. Bar No. 394447

DEFENDANT'S ACKNOWLEDGMENT

I, **Raechel Genco**, 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

Raechel Genco  
Raechel Genco  
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: 6-22-2022

Barbara W Palmer  
Barbara Palmer, Esq.  
Attorney for Defendant Genco