

STATEMENT OF FACTS

Your affiant, David Hubalik, is a special agent assigned to the Federal Bureau of Investigation, Joint Terrorism Task Force (JTTF). In my duties as a special agent, I am assigned to a National Security Squad to investigate acts of domestic terrorism under state and federal law. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a special agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of Federal criminal laws.

The U.S. Capitol 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 were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

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.

As the proceedings continued in both the House and the Senate, and with Vice President Mike 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.

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, around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

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 Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

Target, Lisa Anne HOMER (née Boisselle), was identified as an individual who entered the Capitol Building for approximately one hour. During that time, she moved extensively throughout the building, but there is no evidence, at this time, that she destroyed any property or assaulted any law enforcement officers.

According to records obtained through a search warrant served on Google a cellular phone with a phone number of 509.759.4654 (“subject telephone number”) with an SMS number 15097594654 was identified as being within the restricted area of the United States Capitol on January 6, 2021. A Google account, #929633000000 with an email address of “lisannehomer@gmail.com was also associated with this device. The earliest point of entry on January 6, 2021 was at 2:13:27 PM EST. The latest point that the subject telephone number was identified inside the Capitol building on January 6, 2021 was at 3:17:33 PM EST.

Device ID: -970346431 | Account Email: lisannehomer@gmail.com



For Official Use Only

Name
Lisa Homer
Account Email
lisannehomer@gmail.com
Google Account ID
929633000000
Recovery SMS
15097594654
Sign-in Phone Numbers
Recovery Email
lisa@iwa.us
2-Step Verification Numbers
Alternate Emails
Account Created
10/11/2011
Account Deleted
Last Login
1/19/2021
User Deleted Locations
No
Points in Geofence
66
Points in Capitol
57
Earliest Point (ET)
1/6/2021 2:13:27 PM
Latest Point (ET)
1/6/2021 3:17:33 PM
Duration
1:04

Table dynamically created - multiple records will extend off page. For complete records, see associated spreadsheet.

- Radius <= 100ft
- Radius > 100ft
- Uncertainty Radius
- Capitol Building
- GeoFence

Additional investigation revealed that the subject telephone number was associated with a Samsung Galaxy Z Fold 2 5GM, device ID: IMEI 35655211057332 (the “Samsung”) and Google account ID number 929633000000, which had an email address of lisannehomer@gmail.com and a recovery email of lisa@iwas.us. The Google account was created on October 11, 2011, under the name of Lisa HOMER.

Records checks indicated that HOMER flew from Phoenix Sky Harbor Airport to Dallas Fort Worth Airport on American Airlines Flight #130 on January 3, 2021, changing to American Airline Flight #1291, traveling to Dulles International Airport in Washington D.C. Upon making travel arrangement's, HOMER listed her phone number as 509.759.4654 and an email of lisannehomer@gmail.com. On January 8, 2021, HOMER left Washington D.C. on American Airlines Flight #AA5576 traveling to Charlotte North Carolina, changing to American Airlines Flight #AA778 traveling to Phoenix Sky Harbor Airport.

On January 25, 2021, HOMER entered an Arizona Motor Vehicle Division (“MVD”) office and applied for an Arizona driver license, wherein she listed her residential street address as 7440 E. Via De Luna Drive, Scottsdale, Arizona 85255 (SUBJECT PREMISES) on the application. The application completed by HOMER also listed 509.759.4654 (subject telephone number) as her telephone number. On or about in June 2021, HOMER updated her Arizona driver's license to reflect her legally name change to Lisa Anne Boisselle (subsequent to a final divorce decree from an individual with the last name of Homer).

In the months following the January 6, 2021, riots at the United States Capitol the New York Times assembled video segments taken from numerous sources to produce a video entitled *Day of Rage: How Trump Supporters Took the U.S. Capitol*, which can be found at <https://www.nytimes.com/video/us/politics/10000007606996/capitol-riot-trump-supporters.html>

IMAGES 1-3 below are screenshot photographs of HOMER from the New York Times video. **IMAGE 1** depicts HOMER circled in red at 07:19 into the video as part of the crowd marching towards the Capitol building.



IMAGE 1

IMAGE 2 depicts the crowd of protesters forcefully push through the first police line. At 12:04 into the video, HOMER can easily be seen at the front of the protest line participating in confronting and taunting Capitol Police at the West steps.



IMAGE 2

IMAGE 3 depicts HOMER at 12:04 into the video, while Congress was still in session, William “Billy” Chrestman, one of the Proud Boys¹ leaders is seen whipping up the crowd chanting “who’s house is this?” The crowd responds by yelling “our house.” HOMER is seen standing next to Chrestman participating in the chanting. Referring to the Capitol, Chrestman yells, “who’s house is it?” HOMER and others respond, “our house!” Then Chrestman yells “do you want your house back?” HOMER can be seen and heard yelling “yes” in response. Chrestman then yells, “take it.”² As HOMER is yelling, she can be seen looking over her left shoulder towards the crowd, shortly before the Capitol building was attacked.

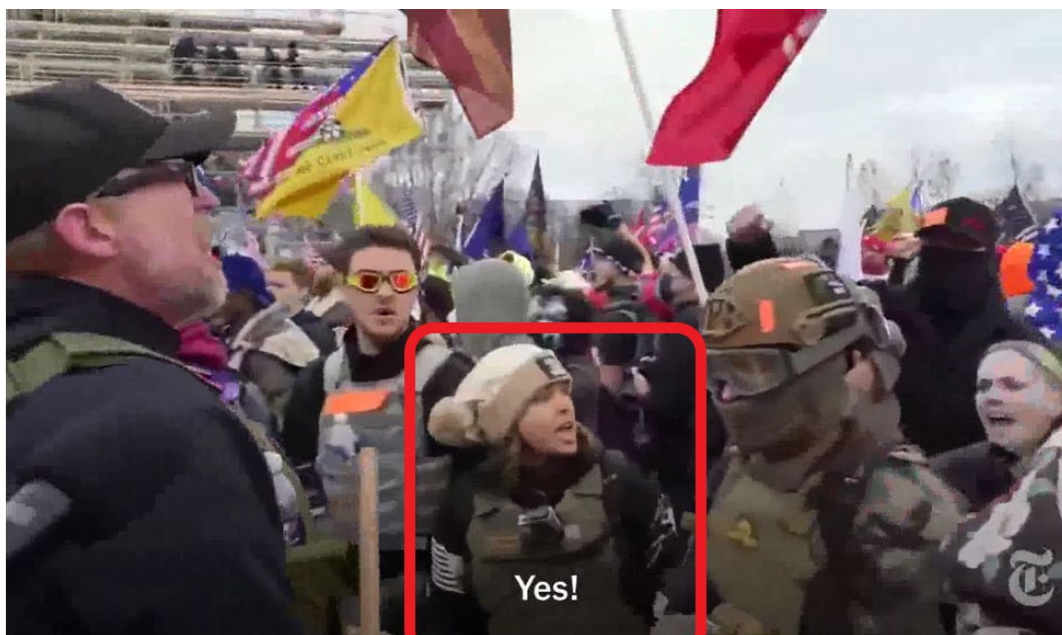


IMAGE 3

IMAGES 4-7 below were obtained from a video on the cellular iPhone of Albert Ciarpelli, who was arrested by the FBI on January 14, 2021, for his involvement in the Capitol riot, and the subject of DC District Court case 21-mj-38. In these photographs HOMER can easily be seen dressed in dark (possibly black) pants, a dark (possibly black or blue) hoodie³ with a white American flag on the right sleeve and a white crossed rifle emblem on the left sleeve. HOMER has a dark colored gator mask around her neck. She is wearing an olive-drab, green-colored wraparound outer carrier vest (designed to hold ballistic body armor) that appears to show the outline of a protective rifle plate inside of the front compartment.⁴ There is a tan square patch with

¹ Proud Boys is a nationalist organization with multiple US chapters and potential activity in other Western countries. The group describes itself as a “pro-Western fraternal organization for men who refuse to apologize for creating the modern world; aka Western Chauvinists.” Proud Boys members routinely attend rallies, protests, and other First Amendment-protected events, where they sometimes engage in violence against individuals whom they perceive as threats to their values. The group has an initiation process for new members, who often wear yellow and black polo shirts or other apparel adorned with the Proud Boys logo to events.

² Chrestman and five other co-conspirators have been charged in case 21-cr-00160-TJK, in which this “call and response” exchange is referenced in paragraph 36 of the public indictment.

³ Prior to January 6, 2021, the Proud Boys communicated about dressing in black on that day, as referenced in paragraph 12 of the indictment in 21-cr-00160-TJK.

⁴ On January 6, 2021, Chrestman and other wore vests similar to HOMER’s vest.

dark writing “Lions Not Sheep” on the right side of the outer carrier front flap. A square camera, possibly a GoPro is attached to the center of the outer carrier directly below HOMER’s chin. This photograph shows HOMER’s face completely exposed. HOMER is also wearing a white knitted beanie with tan trim and a black patch sewn onto the front that states, “Lions Not Sheep.”



IMAGE 4

IMAGES 5 and **6** show HOMER wearing a large dark backpack with an oblong letter “O” that your Affiant is aware of as the trademark of Oakley. The backpack appears to be full of several large unknown objects. Clipped to the back of the backpack is a rectangular, multicolored object. HOMER is seen wearing a tan glove with black padded leather sewn into the glove covering the knuckle area of her left hand. The right-hand glove can be seen in **IMAGES 5** and **6** attached to the right side of the backpack.



IMAGE 5



IMAGE 6

As the video continues, **IMAGE 7** shows HOMER is holding a cellular phone in her hands (her left hand is gloved, and her right hand is ungloved and manipulating the phone), as if she is videotaping what is taking place in the crowd.



IMAGE 7

On July 14, 2021, your affiant and Special Agent Lum met with Scottsdale, Arizona Police Officer Eric Teeter at the Via Linda police station in Scottsdale, Arizona. Officer Teeter advised that he knows who HOMER is from prior police contacts in 2020 (HOMER was a witness/victim, not a suspect/target in the Scottsdale event). Your affiant showed Officer Teeter **IMAGE 4** of HOMER prior to entering the Capitol building. Office Teeter reviewed the photograph and positively identified the female in the photograph as HOMER.

Prior to entering the Capitol building HOMER pulled up the gator that was around her neck so that it covered her nose, as depicted in **IMAGE 8** below. HOMER then put on dark color goggles and a protective helmet covered in green camouflage. Despite the items covering her head and face, the distinctive clothing she was wearing outside of the Capitol building appear to be the same clothing worn by HOMER throughout the time she is inside the Capitol building. Also, items

attached to her backpack when outside of the Capitol building are in the same location while inside of the Capitol building.



IMAGE 8

As depicted in **IMAGES 9** and **10**, once HOMER enters the Capitol building through the damaged doorway, she is seen holding her phone up and one can see she is recording the events. Shortly after entering, she turns and walks up to a broken window. HOMER appears to be recording the crowd coming up the steps and then pans down filming the broken-out glass from the window which now lays on the floor. The clothing and items attached to her backpack now inside of the Capitol Building are the same as prior to entering the Capitol building.



IMAGE 9



IMAGE 10

IMAGES 11 and 12, taken from video surveillance shows HOMER walking through the Rotunda area of the Capitol.

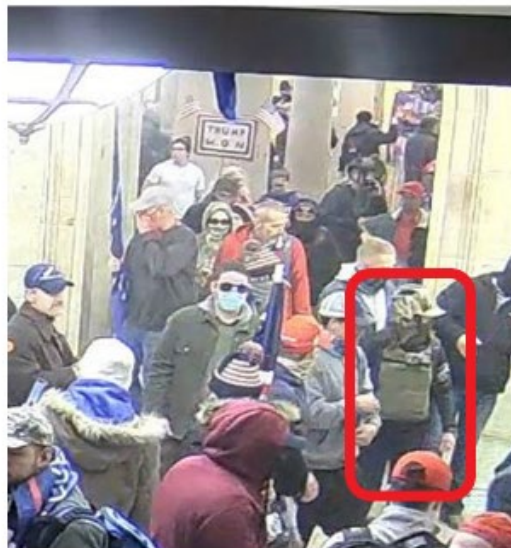


IMAGE 11



IMAGE 12

IMAGES 13 and 14 are taken from CCTV, which captured HOMER inside of the Crypt area of the Capitol and then leaving the Senate wing and eventually the Capitol building.



IMAGE 13

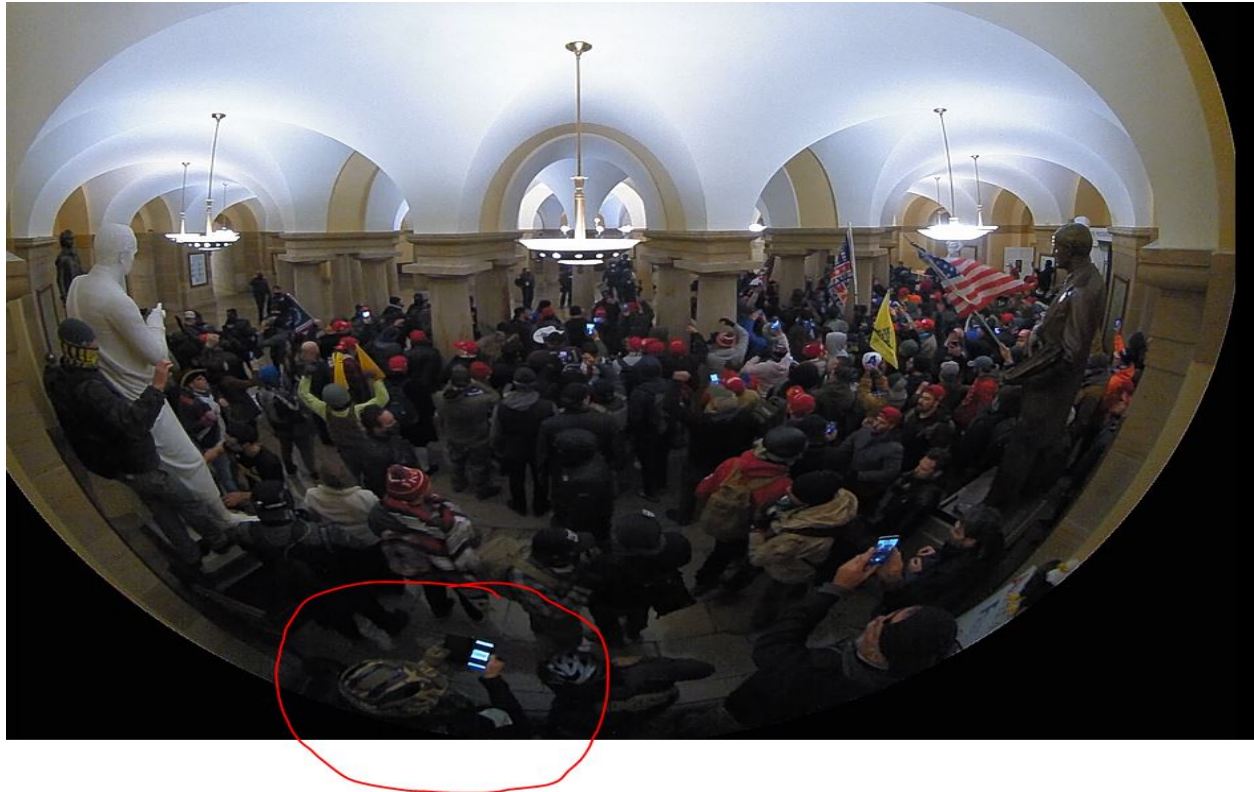


IMAGE 14

Through open-source monitoring of HOMER’s social media found that she has an Instagram account, with the screen name “laboisselle27.” In January 2021, HOMER posted **IMAGE 15** on her Instagram page of a map entitled “We the People” and underneath the caption reads “stolen election.” Also posted is **IMAGE 16**, a photograph of a soldier standing post in what appears to be the Washington D.C. Capitol area. While both photographs show a posted date of January 27, 2021, **IMAGE 16** is believed to have been taken on January 6, 2021.



IMAGE 15



IMAGE 16

An open-source search of HOMER’s social media revealed **IMAGE 17** as the profile page on her MeWe account. It should be noted that HOMER is wearing the same white and tan beanie she had on at the police line at the west steps of the Capitol building. On the front of the beanie is the phrase “Lions Not Sheep.” **IMAGE 17** reads “Lisa HOMER Member since November 2020.”

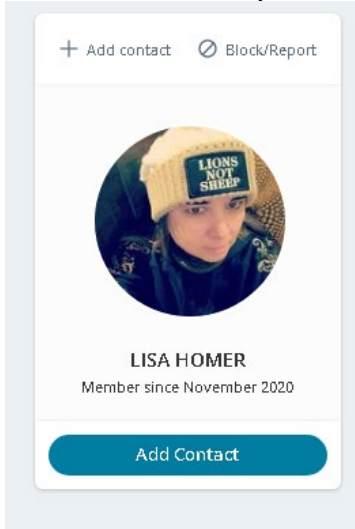


IMAGE 17

IMAGE 18 is a photo HOMER posted on February 21, 2021 of herself on Instagram. In **IMAGE 18**, HOMER is wearing a baseball-style cap with a patch that also reads “Lions Not Sheep.”



IMAGE 18

IMAGE 19 is an emblem that your affiant believes is associated with the Proud Boys group. HOMER posted this image on her Instagram account.



IMAGE 19

On November 14, 2020, the Proud Boys and various pro-Trump groups gathered in Washington, D.C. for the "Million MAGA March" to protest the results of the 2020 presidential election. From HOMER's travel and social media posts, it appears HOMER traveled to D.C. to participate/support this event.

Investigation revealed that HOMER departed Phoenix Sky Harbor Airport on November 13, 2020, at approximately 2:50 PM on United Airlines Flight number 560 arriving at Dulles International Airport in Washington, D.C. at approximately 8:53 PM. When making her travel reservations with United Airlines, HOMER listed her telephone number as 509.759.4654 and her email address as lisannehomer@gmail.com. HOMER also used her Wells Fargo Visa credit/debit card ending in #0942 to pay for her travel. Subsequent records indicated that HOMER returned to Phoenix, Arizona on November 15, 2020, on American Airlines Flight #AA1242.

IMAGE 20 depicts an Instagram posting dated October 30, 2020 (prior to HOMER's travel to Washington, D.C.), in which HOMER wrote, "Let'sblowshitup." [*sic.*]



IMAGE 20

Within a few days of the “Million MAGA March” HOMER posted **IMAGES 21** and **22** on her Instagram account, which appear to be from the November 14, 2021 march in Washington, D.C.



IMAGE 21



IMAGE 22

HOMER posted **IMAGES 23** and **24** on her Instagram account in November 2020 and appear to be from the Proud Boys November 14, 2020 march in Washington, D.C. **IMAGE 23** shows an individual in a Proud Boys tee shirt. **IMAGE 24** shows an injured Proud Boy, with HOMER’s comment, “FuckAntifa.”



IMAGE 23



IMAGE 24

Based on your affiant's familiarity with D.C., **IMAGE 25** appears to be in Washington, D.C. HOMER posted **IMAGE 25** in October 2021, and places herself in D.C. during the Proud Boy 2020 protest.



IMAGE 25

Based on the foregoing, your affiant submits that there is probable cause to believe that Lisa Anne HOMER, aka Boisselle, violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions.

Your affiant submits there is also probable cause to believe that Lisa Anne HOMER violated 40 U.S.C. § 5104(e)(2) which makes it a crime to willfully and knowingly; (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings 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; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.



David Hubalik FBI

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this ____ day of November 2021.

G. MICHAEL HARVEY
U.S. MAGISTRATE JUDGE