

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	Case No.: 21-mj-657
	:	
v.	:	40 U.S.C. § 5104(e)(2)(G)
	:	
LISA ANNE HOMER	:	
a.k.a. LISA ANNE BOISSELLE,	:	
	:	
Defendant.	:	
	:	

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, **LISA ANNE HOMER**, 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 \$2.7 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.

Lisa Anne HOMER's Participation in the January 6, 2021, Capitol Riot

8. The defendant, **LISA ANNE HOMER**, lives in Scottsdale, Arizona. On or about January 3, 2021, HOMER traveled from Arizona to Washington, D.C., via airplane. The purpose of the defendant's trip to Washington, D.C., was to protest Congress' certification of the Electoral College.

9. On January 6, 2021, HOMER attended the "Stop the Steal" rally at the Ellipse and then marched with other protestors to the U. S. Capitol.

10. While on restricted ground of the West Plaza of the U.S. Capitol, HOMER and others at the front line of rioters confronted and taunted USCP officers; Congress was still in session at that time. At this time, an individual identified as a leader of the Proud Boys, William "Billy" Chrestman, chanted "who's house is this?" The crowd responded by yelling "our house." HOMER stood next to Chrestman and participated in the chanting. Referring to the Capitol,

Chrestman yelled, “who’s house is it?” HOMER and others responded, “our house!” Then Chrestman yelled “do you want your house back?” HOMER yelled “yes” in response. Chrestman then yells, “take it.” Chrestman and five other co-conspirators have been charged in case 21-cr-160-TJK.

11. Thereafter, HOMER entered the U.S. Capitol building through the breached Senate Wing Door, at approximately 2:13 PM.

12. HOMER moved through the U.S. Capitol building, including entering the Crypt and an area that leads down to the Capitol Visitor Center, which was being used by the USCP to rest and assist other officers. While inside HOMER was adjacent to several of the defendants charged in 21-cr-160-TJK.

13. Both inside and outside the U.S. Capitol, HOMER used a phone to take photos and/or video.

14. HOMER exited the U.S. Capitol building at approximately 3:17 PM. While inside the Capitol, HOMER wore dark clothing, a helmet, goggles, face covering, and a rifle plate.

Elements of the Offense

15. LISA ANNE HOMER knowingly and voluntarily admits to all the elements of Parading, Demonstrating, or Picketing in a Capitol Building. Specifically, HOMER admits that:

- HOMER willfully and knowingly entered the U.S. Capitol Building knowing that that she did not have permission to do so. HOMER 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

JACQUELINE
SCHESNOL

By:

Jacqueline Schesnol
Assistant United States Attorney
Arizona Bar No. 016742

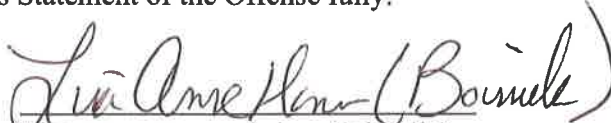


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DEFENDANT'S ACKNOWLEDGMENT

I, Lisa Anne Homer, 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: 7/7/2022



Lisa Anne Homer (a.k.a. Boisselle)
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: 07/08/22



David Chambers
Attorney for Defendant