

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

|                          |   |                         |
|--------------------------|---|-------------------------|
| UNITED STATES OF AMERICA | : | Case No.: 23-CR-4 (APM) |
|                          | : |                         |
| v.                       | : | 18 U.S.C. § 1361        |
|                          | : |                         |
| ISAIAH FARNSWORTH,       | : |                         |
|                          | : |                         |
| 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, **ISAIAH FARNSWORTH**, 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 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.

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

8. Prior to January 6, 2021, the defendant, **ISAAH FARNSWORTH**, drove from Broomfield, Colorado, his home at the time, to Washington, D.C. The purpose of the defendant's trip to Washington, D.C., was to protest Congress's certification of the Electoral College.

9. On January 6, Farnsworth approached Capitol grounds from the National Mall. From the Upper West Terrace of the Capitol building, Farnsworth took pictures of the crowd on the West Front of the grounds. He posted at least one of these pictures to Facebook. He also recorded a video, which he posted to Facebook, in which he can be heard saying, "We have a right to be at our house," "We have a right to be on our lawn," "We have a right to bring our grievances to the government," and "Never, never be passive about such a powerful government any longer."

10. Farnsworth entered the United States Capitol building at approximately 2:44 p.m. through the Parliamentarian Door on the West, Senate Side of the building. Shortly after entering

the Capitol building, Farnsworth joined other rioters attempting to breach an interior door to an office, that is, S-131. Farnsworth repeatedly threw his weight behind other rioters who were throwing their bodies against the door until it yielded. Farnsworth then entered S-131 briefly, before exiting the Capitol building at approximately 2:47 p.m. through the same door that he entered.

11. The approximate value of the damage to the door of S-131 is \$9,860.

12. Later in the evening on January 6, Farnsworth gathered with others believed to have traveled to D.C. to protest the certification of the Electoral College. In a video posted to Farnsworth's Facebook, a male voice can be heard asking Farnsworth "Did you get up on the Capitol building?" Farnsworth replied "Yes sir. You know that's my house. I told them to respect my house, don't break nothing don't steal nothing."

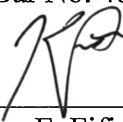
*Elements of the Offense*

13. ISAIAH FARNSWORTH knowingly and voluntarily admits to all the elements of Destruction of Government Property, a violation of 18 U.S.C. § 1361. Specifically, defendant admits that he willfully injured, damaged, or destroyed property of the United States, or of any department or agency thereof, and that the damage to the property in question exceeded the sum of \$1,000. The defendant need not have known that the property belonged to the United States.

Respectfully submitted,

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

By:

  
\_\_\_\_\_  
Kathryn E. Fifield  
Trial Attorney  
Detailed to the United States Attorney's Office

**DEFENDANT'S ACKNOWLEDGMENT**

I, **ISAIAH FARNSWORTH**, 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: 04/04/2023        
**ISAIAH FARNSWORTH**  
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: 4/4/2023        
**MYRLENE MARSA**  
Attorney for Defendant