

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

UNITED STATES OF AMERICA

v.

CHRISTINA LEGROS,

Defendant.

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Case No.: 23-cr-69-2 CKK

**18 U.S.C. § 1752(a)(1) (entering and
remaining in a restricted area)**

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, Christina Legros, with the concurrence of the defendant's 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. The grounds around the Capitol were posted and cordoned off, and the entire area as well as the Capitol building itself were restricted as that term is used in Title 18, United States Code, Section 1752 due to the fact that the Vice President and the immediate family of the Vice President, among others, would be visiting the Capitol complex that day.

3. On January 6, 2021, a joint session of the United States Congress convened at the Capitol. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in 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 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 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 p.m., 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. Officers with the D.C. Metropolitan Police Department were called to assist officers of the USCP who were then engaged in the performance of their official duties. 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 p.m., 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 \$2.9 million dollars for repairs.

7. Shortly thereafter, at approximately 2:20 p.m., 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 p.m. 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 p.m. 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.

The Defendant's Participation in the January 6, 2021, Capitol Riot

8. On December 28, 2020, Christina Legros travelled to Washington D.C., by automobile, with her co-defendant Isaac Thomas from Flint, Michigan.

9. After visiting the District, on December 31, 2020, Ms. Legros then travelled to New York, New York and stayed until after the new year. Ms. Legros and her co-defendant then returned to the area of Washington D.C. on January 4, 2021, and stayed at a hotel in Virginia.

10. On January 6, 2021, at approximately 11:32 a.m., Christina Legros walked the National Mall alongside her co-defendant while recording selfie-style videos with her cell phone.

These videos and photographs depict Ms. Legros wearing a black coat, gray sweatshirt, and dark purple rimmed glasses. During her time on the National Mall, Ms. Legros carried a blue flag affixed to a pole. *See Figure 1.*



Figure 1

11. At approximately 12:23 p.m., Ms. Legros began walking east on Constitution Avenue NW, towards the United States Capitol. During the walk, she again recorded selfie-style videos with her cell phone recording her co-defendant yelling, “Four More Years!” and “To the Capitol!” and “Don’t Lose Hope!” Ms. Legros joined by stating, “all we need is a little hope. Just a little.” At one point, at approximately 12:28 p.m., in response to a random individual’s charge of, “Let me hear a Hell Yeah!” Ms. Legros yelled, “Hell Yeah!”

12. At approximately 12:38 p.m., as the two approached the intersection of Constitution Avenue and 6th St. NW, Ms. Legros's co-defendant explained to her, "where we're going to right now, they're going to be voting. Pretty soon they're going to be having a big hearing. To decide who's going to be . . . [recording ends]."

13. At approximately 12:50 p.m., Ms. Legros approaches the first line of bike racks surrounding the Restricted Area of the Capitol building. Along the line are signs that read, "AREA CLOSED." Immediately behind is another line of bike rack and a line of uniformed officers from the United States Capitol Police. *See Figure 2.*



Figure 2: Rioters behind outer perimeter looking towards Capitol and interior perimeter. Co-defendant circled in yellow, Ms. Legros is not depicted but is present next to her co-defendant.

14. Following the breach of both lines, Ms. Legros travelled towards the Capitol Building on the grass just north of the Pennsylvania walkway, passing another line of fencing as she traveled. *See Figure 3.*

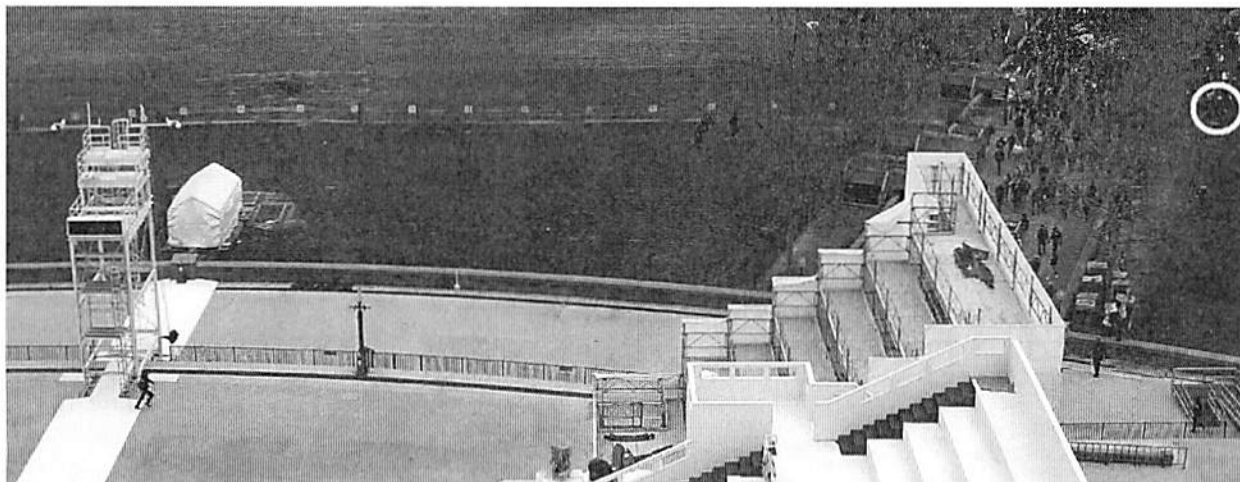


Figure 3

15. Ms. Legros and her co-defendant jumped over a cement half-wall and made their way to the West Plaza at approximately 12:57 p.m. The two remained at the foot of the Northwest Stairs until approximately 1:48 p.m.

16. At approximately 1:41 p.m., Ms. Legros recorded a selfie-style video where she lamented, “I just got sprayed in my face and I did nothing.” *See Figure 4.*



Figure 4

17. At approximately 1:48 p.m., Ms. Legros recorded a group of rioters push past a line of officers at the foot of the Northwest Stairs. At approximately 1:55 p.m., Ms. Legros made it to the top of the first flight of stairs where another line of uniformed officers attempted to stop the rioters. Ms. Legros then moved back down to the West Plaza looking for her co-defendant. She joined others in chants of “U.S.A.!”

18. At approximately 2:16 p.m., Ms. Legros joins in chants of “Our House!” as she moved back up the Northwest Stairs towards the Upper West Terrace. At approximately 2:17 p.m., approximately four minutes after the first breach, Ms. Legros entered the United States Capitol through the Senate Wing Door. *See Figure 5.*



Figure 5

19. Ms. Legros moved south toward the Crypt. She and her co-defendant took a position immediately in front of an impromptu line of officers attempting to stop rioters from diving deeper into the Capitol. *See Figure 6.* This police line broke at approximately 2:25 p.m.



Figure 6

20. Ms. Legros then continued to record her path through the Capitol.

21. At approximately 2:32 p.m., Ms. Legros and her co-defendant entered the Speaker's suite of offices. Ms. Legros recorded overturned furniture and heard rioters breaking glass inside the suite. At approximately 2:34 p.m., Ms. Legros stood near a television turned to a national news channel presenting coverage of what was occurring at the Capitol and again took a selfie.

22. At approximately 2:35 p.m., Ms. Legros stood at the top of the West Staircase and shouted, "Woo!" She recorded as other rioters entered the Rotunda area.

23. Ms. Legros then moved to a balcony overlooking the West Front and exclaimed, “Oh my God, this is beautiful!” See *Figure 7*.



Figure 7: Still from a video file seized from Ms. Legros's phone.

24. Ms. Legros returned to the Rotunda. She again moved back and forth between the Rotunda and the East Rotunda Door lobby until, reconnecting with her co-defendant at approximately 2:44 p.m., the two then moved to the lobby outside the Old Senate Chamber. Ms. Legros joined in chants of: “You Serve Us!” and “Our House!”

25. The rioters in the lobby began to push against another line of officers. Ms. Legros was again separated from her co-defendant and moved back to the Rotunda and the East Rotunda

Door lobby. Ms. Legros finally left the Capitol at approximately 3:33 p.m. after approximately an hour and fifteen minutes inside. *See Figure 8.*



Figure 8

Elements of the Offense

26. The parties agree that 18 U.S.C. § 1752(a)(1) requires the following elements:
 - a. First, the defendant entered or remained in a restricted building or grounds without lawful authority to do so.
 - b. Second, the defendant did so knowingly.

Defendant's Acknowledgments

27. The defendant knowingly and voluntarily admits to all the elements as set forth above. Specifically, the defendant admits that she entered the restricted area in or around the United States Capitol Building and subsequently remained there. The defendant admits that she knew she was not permitted to enter or remain within the restricted area.

Respectfully submitted,

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

By: */s/ Adam M. Dreher*
Adam M. Dreher
Assistant United States Attorney
Mich. Bar No. P79246


DEFENDANT'S ACKNOWLEDGMENT

I, Christina Legros, 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: 4/30/24 Christina Legros
Christina Legros
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: 4/30/24 
Stephen Brennwald
Attorney for Defendant