

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No: 21-CR-250 PLF
	:	
v.	:	
	:	18 U.S.C. § 1752(a)(2)
PHILLIP BROMLEY,	:	
	:	
Defendant.	:	
	:	

STATEMENT OF OFFENSE

Pursuant to Federal Rule of Criminal Procedure 11, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Phillip Bromley, with the concurrence of his attorneys, 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 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 are allowed access inside the U.S. Capitol.
2. On January 6, 2021, the exterior plaza of the U.S. Capitol was closed to members of the public.
3. 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.

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 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.

5. At approximately 2:00 p.m., certain individuals in the crowd forced their way through, up, and over the barricades, and officers of the U.S. Capitol Police, 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 by U.S. Capitol Police Officers or other authorized security officials.

6. 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, shortly after 2:00 p.m., individuals in the crowd forced entry into the U.S. 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 U.S. Capitol, requiring the expenditure of more than \$1.4 million dollars for repairs.

7. 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 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. the same day. In light of the dangerous circumstances caused by the unlawful entry to the U.S. Capitol, including the danger posed by individuals who had entered the U.S. Capitol without any security screening or weapons check, Congressional proceedings could not resume until after every unauthorized occupant had left the U.S. Capitol, and the building had been confirmed secured. The proceedings resumed at approximately 8:00 p.m. after the building had been secured. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the session resumed.

Phillip Bromley's Participation in the January 6, 2021, Capitol Riot

8. The defendant, Phillip Bromley, who lives in Sterrett, Alabama, drove to Washington, D.C. on January 5, 2021. Bromley entered the restricted area of U.S. Capitol Grounds, on the East side of the U.S. Capitol building, in the early afternoon of January 6, 2021. Bromley approached the Southeast Doors of the U.S. Capitol building. There, Bromley, as one member of a larger group of rioters, verbally confronted four U.S. Capitol Police officers who were stationed in front of the Southeast Doors, which were locked. Shortly thereafter, other members of the crowd assaulted the officers. Bromley did not participate in the assaults. The officers then left the area.

9. After the officers left, Bromley redirected one of the individuals who had assaulted the officers, and who was then attempting to follow the officers, back to the Southeast Doors. That individual proceeded to attempt to break the doors' glass using an officer's baton. At one point, Bromley handed this same individual a metal item from Bromley's pocket, which the individual then used to hammer on the doors' glass. The individual was unsuccessful in opening the doors in this way. In taking these actions, Bromley knowingly aided the individual in committing destruction of government property under 18 U.S.C. § 1361, or counseled, commanded, or induced the individual to commit destruction of government property under 18 U.S.C. § 1361, with the intent of facilitating this individual's criminal conduct.

10. Later, the Southeast Doors were opened, apparently by other rioters inside the U.S. Capitol building. Bromley then entered the building, at 2:42 PM, through the Southeast Doors. After entering the U.S. Capitol building, Bromley walked down a hall to the left of the entry foyer inside the Southeast Doors. Shortly thereafter, Bromley stopped and watched a commotion occurring just outside the Chamber of the House of Representatives. A few minutes later, Bromley left the U.S. Capitol building at 2:51 PM through the same Southeast Doors.

11. By aiding and abetting others in attempting to break the Southeast Doors' glass, and by entering the U.S. Capitol building, Bromley knowingly engaged in disorderly and disruptive conduct in a restricted building or grounds as defined in 18 U.S.C. § 1752(c). In addition, Bromley engaged in this disorderly and disruptive conduct at a time when, or so that, such conduct in fact impeded or disrupted the orderly conduct of government business or official functions.

12. After exiting the U.S. Capitol building, Bromley spoke with an individual who was live-streaming interviews with individuals who were on U.S. Capitol Grounds. During that interview, Bromley stated his name and described entering the U.S. Capitol building.

13. In total, Bromley was on U.S. Capitol Grounds for several hours.

Respectfully submitted,

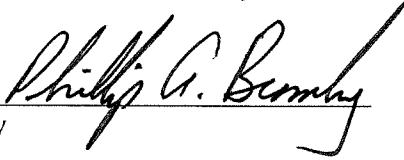
CHANNING D. PHILLIPS
Acting United States Attorney
D.C. Bar No. 415793

By: /s/ William Dreher
WILLIAM DREHER
Assistant United States Attorney

DEFENDANT'S ACKNOWLEDGMENT

I, Phillip Bromley, 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.

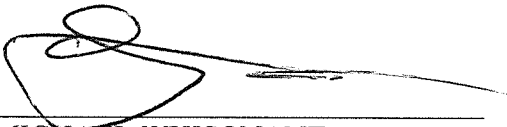
Date: 27 OCT 2021


Phillip Bromley
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: 27 October 2021


MICHAEL WHISONANT
Attorney for Defendant