

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No.: 21-CR-195 (TFH)
	:	
v.	:	18 U.S.C. §§ 1752(a)(1)
	:	
DEBORAH SANDOVAL,	:	
	:	
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, **DEBORAH SANDOVAL**, 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 \$2.8 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.

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

8. On December 21, 2020, Deborah Sandoval sent private messages, as detailed below in **Exhibit 306.2** and **Exhibit 306.28**, detailing her plans to travel to Washington D.C. on January 6, 2021.

Facebook Private Message on 2020-12-21T11:44:13Z

<b>From</b>	- ID Number: <a href="#">1527282918 Facebook</a> Username(s): <a href="#">Deborah Sandoval</a> , <a href="#">Deborah3angels</a>	<b>Images</b>
<b>To</b>	- ID Number: <a href="#">100007974286221 Facebook</a> Username(s): <a href="#">Sebastian S Sandoval-Wignall</a>	
<b>Text</b>	Hey we're going back to Washington January 6 Trump has called all patriots If the electors don't elect we will be forced into civil war China has infiltrated our government thru Biden and they are waiting to attack	
<b>Flagged?</b>	yes	
<b>Source</b>	FB_SW_records.pdf: (p15253), FB_SW_records.pdf: (p9272), FB_SW_records.pdf: (p3730)	
<b>Properties</b>	- Case Number: 266O-OM-3378196-DEBORAH SANDOVAL - Identification Number: THREAD ID 10204397922577951 FACEBOOK	

**Exhibit 306.2**

Facebook Private Message on 2020-12-21T04:07:19Z

<b>From</b>	ID Number: <a href="#">1527282915 Facebook</a> Username(s): <a href="#">Deborah Sandoval, DeborahSangels</a>	<b>Images</b>
<b>To</b>	ID Number: <a href="#">100000055496729 Facebook</a> Username(s): <a href="#">Alican DuShane</a>	
<b>Text</b>	We're going to Washington again January 6 Trump has called on all Republicans and American Patriots	
<b>Flagged?</b>	yes	
<b>Source</b>	FB_SW_records.pdf: [p11468]; FB_SW_records.pdf: [p16461]; FB_SW_records.pdf: [p4292]	
<b>Properties</b>	Case Number: 2680-DM 3378156-DEBORAH SANDOVAL Identification Number: THREAD ID 10204832918162569 FACEBOOK	

**Exhibit 306.28**

9. On January 6, 2021, Deborah Sandoval attended the former President's rally at the Washington Monument. After the rally, she walked to the United States Capitol. By approximately 2:09 p.m., Deborah Sandoval had arrived at the Peace Monument, which was just outside the restricted perimeter around the Capitol. There, she took the photograph shown in **Exhibit 305.2**, below.

**Exhibit 305.2**

10. After arriving at the Peace Monument, Deborah Sandoval entered the restricted area around the Capitol building. At approximately 2:49 p.m., Deborah Sandoval entered the Capitol



through the Senate Wing Doors, which are located on the northwest side of the Capitol. Her entry is depicted, below, in **Exhibit 102.1**. By the time of her entry, the Senate Wing Door had been forced open by other rioters, and the corridor near the door had been overrun. At this time there was glass on the floor, windows were broken, and the fire alarms were loudly ringing.



**Exhibit 102.1**

11. Shortly after entering, Deborah Sandoval, circled below in **Exhibit 107**, can be seen and heard on a video recovered from another rioter's cellphone. On the video, she can be heard yelling "get her ass out here." When she said this, Deborah Sandoval was referring to Nancy Pelosi, the Speaker of the House.



**Exhibit 107**

12. Deborah Sandoval remained in the Capitol until approximately 3:13 p.m., for a total of approximately 24 minutes. She left through the Senate Wing Door, as can be seen in **Exhibit 102.2**, below.



**Exhibit 102.2**

13. In the days and weeks following January 6, 2021, Deborah Sandoval sent a number of messages on her phone and through social media describing her conduct on January 6, 2021. For example, on January 6, 2021, at 9:13 p.m., Deborah Sandoval sent a Facebook message stating, "We stormed the cspioto [sic]." On January 14, 2021, she sent a message to a friend on Facebook inquiring about deleting pictures from the Capitol, including her previous trips to Washington, D.C.

***Elements of the Offense***

14. Deborah Sandoval admits to all of the elements of 18 U.S.C. 1752(a)(1). Specifically, she admits that she entered or remained in a restricted building or grounds without lawful authority to do so; and, second, that she did so knowingly.

Respectfully submitted,

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**DEFENDANT'S ACKNOWLEDGMENT**

I, Deborah Sandoval, 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: 12-13-22

  
Deborah Sandoval  
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: 12-13-22

  
Komron Jon Makoon  
Attorney for Defendant