

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

UNITED STATES OF AMERICA	:	Case No.: 1:21-cr-195-TFH
	:	
v.	:	
	:	
DEBORAH SANDOVAL and SALVADOR SANDOVAL, JR.,	:	
	:	
Defendants.	:	
	:	

STIPULATION OF THE PARTIES

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 following:

Deborah Sandoval's Cell Phone

As part of this case, the Federal Bureau of Investigation ("FBI") legally obtained Defendant Deborah Sandoval's cell phone and performed a download of its contents. The FBI maintained proper chain of custody for the defendant's cell phone, and the data recovered from her cell phone, throughout the pendency of this case. The FBI employed proper and reliable techniques to extract the data from the defendant's cell phone. The defendant's two cell phone numbers were: +1 (XXX) XXX-1400 and +1 (XXX) XXX-2918. Government Exhibits 301 through 317 are accurate and authentic copies of digital content extracted from the defendant's cell phone. Any edits to the content of the defendant's extraction were done to aid in the visual presentation of the evidence. Content from the defendant's phone was not altered or change.

Respectfully submitted,

FOR THE DEFENDANT

FOR THE UNITED STATES
MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

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/s/ Holly F. Grosshans
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v.

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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 following:

Interstate Commerce

The civil disorder on the Grounds of the U.S. Capitol and in the U.S. Capitol building on January 6, 2021, as described in the paragraph above, obstructed, delayed, or adversely affected commerce or the movement of any article or commodity in commerce as those terms are used in Title 18, United States Code, Section 231(a)(3). The term “commerce” means commerce (A) between any State or the District of Columbia and any place outside thereof; (B) between points within any State or the District of Columbia, but through any place outside thereof; or (C) wholly within the District of Columbia.

Under the Constitution, Congress has the exclusive power to enact laws for the District of Columbia.

Impact on Commerce

On January 6, 2021, at around 3:45 p.m., in response to Mayor Bowser's order imposing a curfew in the District of Columbia because of the events at the U.S. Capitol, Safeway closed all 12 of its stores in the District of Columbia as of 4 p.m. Safeway's stores were supposed to close at 11 p.m. Safeway later determined that its District of Columbia stores made between 18% and 47% less in sales to the public on January 6, 2021, than they had been projected to make on that day.

Safeway's District of Columbia stores receive their shipments from a warehouse in Pennsylvania. After 4 p.m. on January 6, 2021, the scheduled shipments for the remainder of the day could not be delivered because the stores were closed and no employees were working.

Federally Protected Function

The civil disorder on the Grounds of the U.S. Capitol and in the U.S. Capitol building on January 6, 2021, as described in the paragraph title "The Civil Disorder" above, adversely affected a "federally protected function" as that term is used in Title 18, United States Code, Section 231(a)(3). That means that the civil disorder adversely affected any function, operation, or action carried out, under the laws of the United States, by any department, agency, or instrumentality of the United States or by an officer or employee thereof. The federal protected functions that were adversely affected included the following: the United States Capitol Police's protection of the U.S. Capitol and the Capitol grounds, and the United States Secret Service's protection of the Vice President of the United States and immediate family members of the Vice President.

Respectfully submitted,

FOR THE DEFENDANT

FOR THE UNITED STATES
MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

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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 following:

**Officers from the United States Capitol Police and
Washington, D.C., Metropolitan Police Department**

On January 6, 2021, officers from the United States Capitol Police (USCP) on the U.S. Capitol Grounds and in the U.S. Capitol building were engaged in their official duties as officers or employees of the United States or of any agency in any branch of the United States Government, as those terms are used in Title 18, United States Code, Section 1114.

On January 6, 2021, officers from the Washington, D.C., Metropolitan Police Department (MPD) on the U.S. Capitol Grounds and in the U.S. Capitol building were assisting officers from the USCP who were engaged in their official duties as officers or employee of the United States or of any agency in any branch of the United States Government, as those terms are used in Title 18, United States Code, Section 1114.

Respectfully submitted,

FOR THE DEFENDANT

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The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendants, Deborah Sandoval and Salvador Sandoval, with the concurrence of their attorney, agree and stipulate to the following:

The Capitol Building and Grounds

By law, 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. At the U.S. Capitol, the building itself has 540 rooms covering 175,170 square feet of ground, roughly four acres. The building is 751 feet long (roughly 228 meters) from north to south and 350 feet wide (106 meters) at its widest point. The U.S. Capitol Visitor Center is 580,000 square feet and is located underground on the east side of the Capitol. On the west side of the Capitol building is the West Front, which includes variety of open concrete spaces, a fountain surrounded by a walkway, two broad staircases, and multiple terraces at each floor. On January 6, 2021, the inaugural stage scaffolding was on the West Front of the Capitol building. On the East Front are three staircases,

porticos on both the House and Senate side, and two large skylights into the Visitor's Center surrounded by a concrete parkway.

The Certification of the Electoral College Vote

On January 6, 2021, a joint session of the United States Congress convened at the U.S. Capitol. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in both the House and Senate 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.

On January 6, 2021, the House of Representatives began its session at approximately 12:00 p.m., the Senate began its session at approximately 12:30 p.m., and the two Houses met together at approximately 1:00 p.m. in the House of Representatives chamber to begin the joint session. Vice President Mike Pence was in the Capitol building and presiding over the joint session. At approximately 1:15 p.m., the House and Senate adjourned to their separate chambers for up to two hours to resolve a particular objection.

At approximately 2:12 p.m., Vice President Pence evacuated the Senate chamber, and approximately one minute later the senator who had become the presiding officer in Vice President Pence's absence declared that the Senate would stand in recess. Senators evacuated the Senate chamber.

At approximately 2:15 p.m., Speaker Nancy Pelosi, who was presiding over the House of Representatives, evacuated the House chamber, and approximately fifteen minutes later the representative who had become the presiding officer in her absence declared that the House would stand in recess. Representatives evacuated the House chamber. Other Representative were evacuated later from the House Gallery.

The joint session was suspended.

The Senate and House resumed meeting at approximately 8:06 p.m. and 9:02 p.m., respectively. Congress's joint session continued until approximately 3:44 a.m. on January 7, 2021, when it completed the certification of the Electoral College vote.

The certification of the vote count of the Electoral College was an "official proceeding" as that term is used in Title 18, United States Code, Section 1512(c)(2) and 1515(a)(1).

Respectfully submitted,

FOR THE DEFENDANT

FOR THE UNITED STATES
MATTHEW M. GRAVES
United States Attorney
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Identity of the Deborah Sandoval

The photo below was taken in Washington, DC on January 6, 2021. Defendant Deborah Sandoval (far left and circled in red) and Defendant Salvador Sandoval (far right and circled in yellow) are pictured in Government Exhibit 106 below.



The photo below is Government Exhibit 107 and was extracted from Defendant Deborah Sandoval's phone. It is a photo of Deborah Sandoval as she appeared on January 6, 2021, while inside the Capitol.



The photo below is Government Exhibit 108 and is a close up of a still photo of CTTV footage from inside the Capitol on January 6, 2021. Circled in red is Deborah Sandoval as she appeared on January 6, 2021, while inside the Capitol.



Respectfully submitted,

FOR THE DEFENDANT

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