## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

Case No. 21-mj-657 (GMH)

:

LISA ANNE HOMER

a.k.a. LISA ANNE BOISSELLE,

:

Defendant.

v.

## UNOPPOSED MOTION TO CONTINUE AND TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and David Chambers, counsel for Lisa Anne Homer ("the defendant"), hereby submit the following Motion to Continue and to Exclude Time Under the Speedy Trial Act. The parties request to continue the preliminary hearing currently scheduled for Tuesday, May 26, 2022, for a period of approximately 60 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the parties represent:

- 1. The defendant is before the Court charged in a criminal complaint with offenses, including: Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2); Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(G)(ECF No. 1).
- The government continues to provide voluminous discovery to the defense and most recently made voluminous discovery production number 15.

- The government has not yet extended a plea offer; however both parties prefer to resolve this case without a trial.
- 4. The defendant is out of custody and is compliant with pre-trial release conditions.
- 5. The defendant concurs with the request to delay the preliminary hearing for 60 days.
- 6. The parties believe it is in the interest of justice to toll the Speedy Trial Act while the government continues to provide discovery and defendant continues to review discovery.

  The parties thus request a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i), (ii), and (iv).
- 7. Therefore, the parties request the May 26, 2022, preliminary hearing be continued for approximately 60 days, and that there is an exclusion of time under the Speedy Trial Act from May 26, 2022, through the next scheduled hearing date.
- 8. The defendant concurs with this request.

Respectfully submitted,

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