

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

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Case No: 22-CR-25 (APM)

v.

40 U.S.C. §§5104(e)(2)(G)

Stefanie Chiguer,

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, Stefanie Chiguer, 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 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.

Stefanie Chiguer's Participation in the January 6, 2021, Capitol Riot

8. The defendant, Stefanie Chiguer, traveled from the Dracut, Massachusetts area with co-defendant Kirstyn Niemela and March Leach on January 5, 2021 to attend the "Stop the Steal" rally in support of President Trump. She and Niemela had attended an earlier event in December of 2020 also in Washington, D.C. to protest the 2020 presidential election results. From January 5th to January 7th of 2021, defendant and the other two stayed at the Embassy Suites on Military Road in Washington, D.C. The trio met Michael Eckerman and his cousin in the parking garage at the hotel. Eckerman and his cousin joined the three in attending the rally, and all five went together in the morning to attend the rally. While at the rally, Eckerman, the defendant, Niemela and Leach were photographed standing together in a picture later posted on

Facebook by another individual. The defendant and Niemela wore matching black sweatshirts, and draped flags around them like capes. Niemela wore her hoody and sunglasses, but the defendant did not cover her head. Eckerman wore a tactical vest, neon gloves and a red ball cap.

9. After the rally, the group of five walked to the Capitol. The defendant observed rioters fighting with police outside the Capitol at approximately 2:01 p.m. Eckerman became very vocal and began yelling at the police during this time. Eckerman moved up and away from the group and got closer to the fighting. The defendant filmed several scenes that day on her phone, including one video of the assault and Eckerman's reaction to it. The defendant pulled Eckerman away from the fight after which the defendant, Niemela and Eckerman entered the Capitol at about 2:24 p.m. through the Senate Wing Doors. The defendant filmed the rioters outside these doors chanting "Let us in." The defendant held onto Eckerman's vest at entry and at other times when in a crowd of rioters.

10. At approximately 2:25 p.m. the defendant, Eckerman and Niemela went into the Crypt and made their way toward the Memorial Doors as a huge crowd tried to get past officers to go upstairs to Statuary Hall. The three were part of the mob at 2:27 p.m. that funneled into the area by the Memorial doors, where three officers were trying to keep the crowd from going further. The defendant was behind Eckerman, holding onto his vest, and Niemela was beside her. Eckerman was face to face with one of the officers. The defendant saw the crowd push past the officers, but because she was behind Eckerman, she was not in a position to see whether Eckerman pushed the officer in front of him. This incident lasted about 40 seconds. After pushing through the police line with the crowd, the defendant, Eckerman and

Niemela then went into Statuary Hall at about 2:30 p.m., where they were caught on camera by a CNN film crew.

11. The defendant, Eckerman, and Niemela were part of the crowd in the Statuary Hall connector from about 2:31 p.m. until the crowd pushed past the police line at 2:36 p.m. and flooded into the House side of the Capitol. Defendant again held onto Eckerman as he stood in the front lines pushing and yelling at the police. After getting past the police line, the three walked east down the Main Door Hall at approximately 2:40 p.m. and turn to go into the Rayburn Conference Room atop the East Plaza, where Eckerman was photographed standing by the portrait of George Washington.

12. At 2:41 p.m., defendant, Eckerman and Niemela left the Rayburn Conference Room and walked down the hall near the Easter Stairs and continued past the South East doors until they left the Capitol building through the East Front House door at approximately 2:44 p.m. Once outside they watched as others left, and heard rioters shout that someone had been shot.

13. The defendant filmed the chaotic scene outside the building while Eckerman, Niemela and now Leach were standing nearby. In the video, she captured Eckerman yelling “they are fuckin’ murdering us, right now” and that he had “knocked over 6 cops” while inside the Capitol. The video also captured Eckerman saying “they’re fuckin’ scared of us. The real murderers are the fuckin’ media.” The defendant was with Eckerman when he was filmed by Freedom.com yelling about the shooting of Ashli Babbitt, during which he said “I don’t know her name. All I know is that we went in there as patriots – she’s dead... these mother fuckers are traitors. They’re traitors.” The defendant pulled Eckerman away from the camera crew, and she, Niemela and Eckerman left the area.

14. After she and Niemela returned home, the defendant was part of a group text that included Eckerman and Niemela that began on or around January 8, 2021. Defendant and Niemela shared their views of the events, photographs and videos taken on January 6, 2021 in Washington, D.C. with Eckerman and Leach as well as other individuals.

15. Defendant was interviewed on December 2, 2021 by agents with the FBI with her step-father present. The defendant provided the videos she took on January 6, 2021 to the FBI.

16. The defendant knew at the time she entered the U.S. Capitol Building that that she did not have permission to enter the building and the defendant paraded, demonstrated, or picketed.

Respectfully submitted,

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

By: Mona Lee M. Furst
Mona Lee M. Furst
Assistant United States Attorney

DL

DEFENDANT'S ACKNOWLEDGMENT

I, Stefanie Chiguer, 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: 2/24/2022

Stefanie Chiguer
Stefanie Chiguer
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: 2-28-22

Heather Shaner
Heather Shaner
Attorney at Law
Attorney for Defendant

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