IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	Case No: 21-cr-325 (CKK)
v.	:	
	:	
BOYD CAMPER,	:	40 U.S.C. § 5104(e)(2)(G)
	:	
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, Boyd Camper, with the concurrence of his 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

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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.

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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.

Boyd Camper's Participation in the January 6, 2021, Capitol Riot

8. On January 6, 2021, Boyd Camper attended a rally by the White House on the National Mall and then moved with a large crowd to the west side of U.S. Capitol Grounds.

9. Camper subsequently admitted to law enforcement that he "picked the right hole" to get himself to a stairway area. He saw that the police lines had been broken, as well as persons getting tear gassed and pushing to get inside the building. Camper stated that he believed he was in the frontline of the situation, and that "in my mind, we were going to take the Capitol steps." Camper also admitted that he went inside the U.S. Capitol building.

10. At approximately 2:45 p.m., Camper entered the U.S. Capitol building via the Upper West Terrace Door. He then walked around various areas of the U.S. Capitol building, including the Rotunda, before exiting the U.S. Capitol building.

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11. Throughout the day on January 6, 2021, Camper was in possession of a Go-Pro camera with an extension pole that he held above shoulder level while recording events. Camper recorded his entry into the U.S. Capitol and he continued to record with the Go-Pro camera throughout his time inside the U.S. Capitol building. The Go-Pro camera had audio capabilities that recorded Camper's statements while he was both inside and outside the U.S. Capitol building.

12. On January 21, 2021, Camper was interviewed by law enforcement and said that he did not want to share the contents of his Go-Pro camera from January 6, 2021, for fear of implicating himself. He told law enforcement that he would do so, however, if he received a guarantee that the audio would not be used against him. On March 11, 2021, Camper contacted law enforcement and spoke with the same agent. The agent asked if Camper still had the Go-Pro, and he told her it was "inaccessible, buried out in the cold" and did not reveal its location.

13. The government requested that Camper provide the data that was recorded on his Go-Pro camera from January 6, 2021. Camper stated that he had previously disposed of the recording and therefore, was not in possession of the recordings anymore.

14. Camper willfully and knowingly paraded, demonstrated, or picketed in the U.S. Capitol building.

Respectfully submitted,

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

By: _____
Jacob J. Strain
Assistant United States Attorney

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DEFENDANT'S ACKNOWLEDGMENT

I, Boyd Camper, 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: 8-2-21

Boyd Camper
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: Aug. 2, 2021

Nathan Silver
Attorney for Defendant

JJS