# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

**UNITED STATES OF AMERICA** CRIMINAL NO.

:

: **MAGISTRATE NO. 21-MJ-209** v.

MATTHEW CLARK, **VIOLATIONS:** 

CHRISTY CLARK, and 18 U.S.C. § 1752(a)(1) :

PAUL SPIGELMYER, (Entering and Remaining in a Restricted : :

**Building**)

18 U.S.C. § 1752(a)(2) Defendants. :

> (Disorderly and Disruptive Conduct in a :

**Restricted Building)** : 40 U.S.C. § 5104(e)(2)(D) :

(Violent Entry and Disorderly Conduct in

a Capitol Building) 40 U.S.C. § 5104(e)(2)(G)

(Parading, Demonstrating, or Picketing in :

a Capitol Building) :

## **INFORMATION**

The United States Attorney charges that:

#### **COUNT ONE**

On or about January 6, 2021, within the District of Columbia, MATTHEW CLARK, CHRISTY CLARK, and PAUL SPIGELMYER, did knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off, and otherwise restricted area within the United States Capitol and its grounds, where the Vice President and Vice President-elect were temporarily visiting, without lawful authority to do so.

(Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, Section 1752(a)(1))

#### COUNT TWO

On or about January 6, 2021, within the District of Columbia, MATTHEW CLARK, CHRISTY CLARK, and PAUL SPIGELMYER, knowingly, and with intent to impede and disrupt the orderly conduct of Government business and official functions, engaged in disorderly and disruptive conduct in and within such proximity to, a restricted building and grounds, that is, any posted, cordoned-off, and otherwise restricted area within the United States Capitol and its grounds, where the Vice President and Vice President-elect were temporarily visiting, when and so that such conduct did in fact impede and disrupt the orderly conduct of Government business and official functions.

(**Disorderly and Disruptive Conduct in a Restricted Building**, in violation of Title 18, United States Code, Section 1752(a)(2))

#### **COUNT THREE**

On or about January 6, 2021, within the District of Columbia, MATTHEW CLARK, CHRISTY CLARK, and PAUL SPIGELMYER, willfully and knowingly engaged in disorderly and disruptive conduct in any of the Capitol Buildings with the intent to impede, disrupt, and disturb the orderly conduct of a session of Congress and either House of Congress, and the orderly conduct in that building of a hearing before or any deliberation of, a committee of Congress or either House of Congress.

(Violent Entry and Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, Section 5104(e)(2)(D))

### **COUNT FOUR**

On or about January 6, 2021, within the District of Columbia MATTHEW CLARK, CHRISTY CLARK, and PAUL SPIGELMYER, willfully and knowingly paraded, demonstrated, and picketed in any United States Capitol Building.

(Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, Section 5104(e)(2)(G))

Respectfully submitted,

CHANNING PHILLIPS
Acting United States Attorney

By:

JAMES I. PEARCE

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