# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : CRIMINAL NO. 21-CR-050 (CRC)

:

:

v. : MAGISTRATE NO. 21-MJ-179

MAGISTRATE NO. 21-MJ-181

JENNIFER LEIGH RYAN,

JASON LEE HYLAND, and : VIOLATIONS:

KATHERINE STAVELEY SCHWAB, : 18 U.S.C. § 1752(a)(1)

: (Entering and Remaining in a Restricted

**Defendants.** : Building)

: 18 U.S.C. § 1752(a)(2)

: (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, **JENNIFER LEIGH RYAN**, **JASON LEE HYLAND**, and **KATHERINE STAVELEY SCHWAB**, did knowingly enter and remain in the United States Capitol, a restricted building, 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, **JENNIFER LEIGH RYAN**, **JASON LEE HYLAND**, and **KATHERINE STAVELEY SCHWAB**, 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, the United

States Capitol, a restricted building, 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, JENNIFER LEIGH RYAN, JASON LEE HYLAND, and KATHERINE STAVELEY SCHWAB, willfully and knowingly engaged in disorderly and disturbtive conduct in any of the Capitol Buildings with the intent to impede, disrupt, and disturb the orderly conduct of a session of Congress or either House

(Violent Entry and Disorderly Conduct in a Capitol Building, in violation of Title 40,

### COUNT FOUR

On or about January 6, 2021, in the District of Columbia, JENNIFER LEIGH RYAN, JASON LEE HYLAND, and KATHERINE STAVELEY SCHWAB, willfully and knowingly

paraded, demonstrated, and picketed in a Capitol Building.

United States Code, Section 5104(e)(2)(D)

of Congress.

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

Respectfully submitted,

MICHAEL R. SHERWIN N.Y. Bar No. 4444188

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