

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No. 1:21-cr-668 (TNM)
	:	
v.	:	
	:	December 16, 2022
MICK CHAN	:	

**JOINT PRETRIAL FILING**

This Court’s Minute Order on August 24, 2022 instructed the parties to submit joint proposed voir dire and jury instructions by December 16, 2022. Since then, the defendant, Mick Chan and his counsel have executed a jury trial waiver, which counsel for the Government has also signed. The Government expects to deliver the hard copy of this waiver, with wet ink signatures, to chambers within the next few days. As of this filing, the document is still in transit from the undersigned’s office in Connecticut to the Court’s chambers in Washington, D.C. A scanned copy of the jury trial waiver is appended to this filing.

Accordingly, the parties fully expect to proceed with a bench trial in this case. Nevertheless, in an abundance of caution, the parties hereby submit joint proposed voir dire and jury instructions, in accordance with the Court’s August 24<sup>th</sup> Minute Order. The parties are in substantial agreement regarding the general jury instructions that are appropriate for this case. The parties differ, however, on their views of the specific offense instructions. As a result, this joint filing includes the parties’ different positions on those instructions.

Respectfully submitted,

FOR THE DEFENDANT

/s/ Peter M. Carter  
Peter M. Carter, Esquire

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY  
D.C. Bar No. 481052

/s/Katherine E. Boyles

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UNITED STATES OF AMERICA	:	Case No. 1:21-cr-668 (TNM)
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**PROPOSED VOIR DIRE QUESTIONS**

1. This is a criminal case entitled *United States v. Mick Chan*, 1:21-cr-00668 (TNM). The defendant is charged with four offenses: Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1), Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(2), Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D), and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of and 40 U.S.C. § 5104(e)(2)(G). The defendant was arrested in connection with the events that occurred at the U.S. Capitol on January 6, 2021. Do you know or have you heard anything about this specific case?

2. The Government in this case is represented by Assistant U.S. Attorneys Matthew Moeder and Katherine Boyles. Defendant Mick Chan is represented by Attorneys Peter Carter and Shishene Jeng. The defendant is a resident of Edison, New Jersey. Do you know any of these people?

3. [Each side will introduce its witnesses by name, general area of residence, and employment.] Do you know any of the witnesses who have been introduced to you?

The next four questions relate to you, members of your immediate family, and close personal friends:

4. Does anyone in that group now work for, or has anyone in that group ever worked for, any law-enforcement agency? This includes any police department in or outside the District,

special police officers, prosecutors' offices such as the state's attorney or U.S. Attorney, Park Police, FBI, Dept. of Justice, Homeland Security, sheriffs' departments, Secret Service, or any other law-enforcement agency.

5. Has any member of that group ever gone to law school, worked as a lawyer, or worked in a law office?

6. Has any member of that group ever been arrested for, convicted of, or charged with a crime or been a victim of or witness to a crime?

7. Does any member of that group live or work in or near the U.S. Capitol?

The next set of questions relate just to you:

8. Do you have any difficulty reading, speaking, or understanding English?

9. I will be instructing the jury at the end of this trial that the testimony of a law enforcement witness should be treated the same as testimony of any other witness and that the jury should not give either greater or lesser weight to the testimony of a law enforcement witness. Is there any reason you would not be able to follow that instruction?

10. If you are selected as a juror in this case, I will instruct you to avoid all media coverage, including radio, television, podcasts, and social media, and not to use the internet with regard to this case for any purpose. That is, you will be forbidden from reading newspaper articles about this case, listening to radio and podcast stories about this case, watching TV news about this case, googling this case, blogging or tweeting about this case, or reading or posting comments about this case on any social media sites. Do you have any reservations or concerns about your ability or willingness to follow this instruction?

11. Jurors are the sole judges of the facts. However, the jury must follow the principles of law as instructed by the judge. The jury may not follow some rules of law and ignore others.

Even if the jury disagrees or dislikes the rules of law or does not understand the reasons for some of the rules, it is their duty to follow them. Do you have any personal beliefs that would make it difficult to follow the Court's legal instructions, whatever they may be?

12. Have you had any unpleasant experiences with the police, a prosecutor, or other law enforcement, whether here in D.C. or elsewhere, that would make it difficult for you to be a fair juror in this trial? Have you had any unpleasant experiences with a defense attorney or defense investigator, whether here in D.C. or elsewhere, that would make it difficult for you to be a fair juror in this trial?

13. Have any of you had an experience as a member of a grand jury or as a juror in a previous trial?

14. Do you or someone close to you have any personal or professional connection to events at the U.S. Capitol on January 6, 2021?

15. Have you ever watched video of what happened at the U.S. Capitol on January 6, 2021 on the news or on the Internet?

- a. If yes, will you have any difficulty putting aside any opinions you may have formed about the people involved in those events, following the law as I explain it to you, and deciding the case in a fair and impartial manner based solely on the evidence presented in court?

16. A House Select Committee has been holding hearings concerning the events at the U.S. Capitol on January 6, 2021. Have you watched the televised hearings of the House Select Committee investigating January 6?

- a. If yes, will you have any difficulty putting aside any opinions you may have formed about the people involved in those events, following the law as I

explain it to you, and deciding the case in a fair and impartial manner based solely on the evidence presented in court?

17. No matter what you have heard or seen about events at the U.S. Capitol on January 6, 2021, and any opinions you might have formed about those events, would you have any difficulty setting your opinions aside and deciding this case in a fair and impartial manner based solely on the evidence presented in court?

18. As you sit here, do you have an opinion about the defendants' guilt or innocence in this case?

19. Would serving as a juror in this case be an extreme hardship to you? We expect this trial may last two to three days.

20. Do you have a health or physical problem that would make it difficult to serve on this jury?

21. Is there any other reason that would make it difficult for you to sit as a juror in this case? Perhaps you have a religious, moral, or philosophical reason that you believe would make it hard for you to be fair. In sum, is there some other reason that would make it difficult for you to sit as a fair, impartial, and attentive juror in this particular case?

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**JOINT PROPOSED JURY INSTRUCTIONS**

The parties request the following jury instructions.

**A. Jointly Proposed Jury Instructions**

**I. Instructions Before and During Trial**

The parties have no objection to the Pattern Criminal Jury Instructions for the District of Columbia, 2021 Release (“Redbook”), as appropriate based on the developments at trial.

**II. Final Instructions**

- 1. Furnishing the Jury with a Copy of the Instructions, Redbook 2.100
- 2. Function of the Court, Redbook 2.101
- 3. Function of the Jury, Redbook 2.102
- 4. Jury’s Recollection Controls, Redbook 2.103
- 5. Evidence in the Case, Redbook 2.104
- 6. Statements of Counsel, Redbook 2.105
- 7. Indictment Not Evidence, Redbook 2.106
- 8. Burden of Proof, Redbook 2.107
- 9. Reasonable Doubt, Redbook 2.108
- 10. Direct and Circumstantial Evidence, Redbook 2.109
- 11. Nature of Charges Not to Be Considered, Redbook 2.110
- 12. Number of Witnesses, Redbook 2.111

13. Inadmissible and Stricken Evidence, Redbook 2.112
14. Credibility of Witnesses, Redbook 2.200
15. Police Officer's Testimony, Redbook 2.207
16. Right of Defendant Not to Testify, Redbook 2.208 *or* Defendant as Witness, Redbook 2.209, *as applicable*
17. Statements of the Defendant – Substantive Evidence, Redbook 2.305
18. Transcripts of Tape Recordings, Redbook 2.310
19. Count One: Entering or Remaining in a Restricted Building, 18 U.S.C. § 1752(a)(1) [see the parties' proposals below]
20. Count Two: Disorderly or Disruptive Conduct in a Restricted Building, 18 U.S.C. § 1752(a)(1) [see the parties' proposals below]
21. Count Three: Violent Entry or Disorderly Conduct in a Capitol Building, 40 U.S.C. § 5104(e)(2)(D) [see the parties' proposals below]
22. Count Four: Parading, Demonstrating, or Picketing in a Capitol Building, 40 U.S.C. § 5104(e)(2)(G) [see the parties' proposals below]
23. Proof of State of Mind, Redbook 3.101
24. Aiding and Abetting, Redbook 3.200
25. Multiple Counts – One Defendant, Redbook 2.402
26. Unanimity—General, Redbook 2.405
27. Verdict Form Explanation, Redbook 2.407
28. Redacted Exhibits, Redbook 2.500
29. Exhibits During Deliberations, Redbook 2.501
30. Selection of Foreperson, Redbook 2.502
31. Possible Punishment Not Relevant, Redbook 2.505
32. Cautionary Instruction on Publicity, Communication, and Research, Redbook 2.508

33. Communication Between Court and Jury During Jury's Deliberations, Redbook 2.509
34. Attitude and Conduct of Jurors in Deliberations, Redbook 2.510
35. Excusing Alternate Jurors, Redbook 2.511

**GOVERNMENT’S PROPOSAL**

**Proposed Instruction No. 19**

**ENTERING OR REMAINING IN A RESTRICTED BUILDING<sup>1</sup>**

18 U.S.C. § 1752(a)(1)

Count One of the Information charges the defendant with entering or remaining in a restricted building, which is a violation of federal law.

In order to find the defendant guilty of this offense, you must find that the government proved each of the following elements beyond a reasonable doubt:

1. First, that the defendant entered or remained in a restricted building without lawful authority to do so.
2. Second, that the defendant did so knowingly.

The term “restricted building” means any posted, cordoned off, or otherwise restricted area of a building where a person protected by the Secret Service is or will be temporarily visiting.

The term “person protected by the Secret Service” includes the Vice President and the immediate family of the Vice President.

A person acts “knowingly” if he realizes what he is doing and is aware of the nature of his conduct, and does not act through ignorance, mistake, or accident. In deciding whether the defendant knowingly entered or remained in a restricted building, you may consider all of the evidence, including what the defendant did or said.<sup>2</sup>

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<sup>1</sup> 18 U.S.C. §§ 1752, 3056; *United States v. Jabr*, 4 F.4th 97, 101 (D.C. Cir. 2021).

<sup>2</sup> *See* Seventh Circuit Pattern Criminal Jury Instructions; *see also Arthur Andersen LLP v. United States*, 544 U.S. 696, 705 (2005).

A person who enters a restricted building with a good faith belief that he is entering with lawful authority is not guilty of this offense. Thus, you cannot find the defendant guilty of Count One unless you are convinced beyond a reasonable doubt that he did not have a good faith belief of his lawful authority to enter or remain in the restricted building.

**DEFENDANT'S PROPOSAL**

**Proposed Instruction No. 19**

18 U.S.C. 1752(a)(1)

[Adapted from D.C. Redbook Instruction 5.401 for D.C. Code § 22-3302]

In order for you to find the Defendant guilty of unlawful entry, the Government must prove the following elements beyond a reasonable doubt;

- First, that the Defendant entered a restricted area of the Capitol or the Capitol grounds.
- Second, that the Defendant entered the restricted area voluntarily, on purpose, and not by mistake or accident.
- Third, that the Defendant had no lawful authority to enter the restricted area.

With regard to the first element, an area of the Capitol or Capitol grounds was restricted if it was physically demarcated at the time when the Defendant entered. See *United States v. Bursey*, 416 F.3d 301, 307 (4th Cir. 2005) (declining to decide whether the boundaries must be physically demarcated).

Additionally, the area must have been restricted because the President or other person protected by the Secret Service was or would be temporarily visiting; or because of an event designated as a special event of national significance. 18 U.S.C. § 1752(c)(1)(B-C).

With regard to the second element, if the defendant did not know that the area was restricted, he is not guilty of the offense. See *United States v. Villanueva-Sotelo*, 515 F.3d 1234, 1246 (D.C. Cir. 2008) (finding that the defendant must know that the means of identification belongs to another person to find him guilty of aggravated identity theft).

With regard to the third element, one who enters a restricted area with a good faith belief that he is entering with lawful authority is not guilty of unlawful entry. Thus, you cannot find the Defendant guilty of unlawful entry unless you are convinced beyond a reasonable doubt that he did not have a good faith belief of his lawful authority to enter the area.

In order for you to find the Defendant guilty of unlawfully remaining, the Government must prove each of the following elements beyond a reasonable doubt;

- First, that the Defendant was present in a restricted part of the Capitol building or Capitol grounds.
- Second, that the Defendant was directed to leave the building or grounds by the Capitol Police.
- Third, that the Capitol Police had the lawful authority to direct the Defendant to leave the building or grounds.
- Fourth, that at the time the Defendant was directed to leave the building or grounds, he did not have the lawful authority to remain there.
- Fifth, that the Defendant knew she was remaining in the building or grounds against the will of the Capitol Police.
- Sixth, that upon being directed to leave the building or grounds, the Defendant refused to leave.

With regard to the first element, an area of the Capitol or Capitol grounds was restricted if it was physically demarcated at the time when the Defendant entered. *See United States v. Bursey*, 416 F.3d 301, 307 (4th Cir. 2005) (declining to decide whether the boundaries must be physically demarcated).

Additionally, the area must have been restricted because the President or other person protected by the Secret Service was or would be temporarily visiting; or because of an event designated as a special event of national significance. 18 U.S.C. § 1752(c)(1)(B-C).

With regard to the fourth element, one who remains in a restricted area with a good faith belief of his legal authority to remain there is not guilty of unlawfully remaining. Thus, you cannot find the Defendant guilty of unlawfully remaining unless you are convinced beyond a reasonable doubt that he did not have a good faith belief in his legal authority to remain in the area after being directed to leave.

**GOVERNMENT’S PROPOSAL**

**Proposed Instruction No. 20**

**DISORDERLY OR DISRUPTIVE CONDUCT IN A RESTRICTED BUILDING<sup>3</sup>**

18 U.S.C. § 1752(a)(2)

Count Two of the Information charges the defendant with disorderly or disruptive conduct in a restricted building, which is a violation of federal law.

In order to find the defendant guilty of this offense, you must find that the government proved each of the following elements beyond a reasonable doubt:

1. First, that the defendant engaged in disorderly or disruptive conduct in, or in proximity to, any restricted building.
2. Second, that the defendant did so knowingly, and with the intent to impede or disrupt the orderly conduct of Government business or official functions.
3. Third, that the defendant’s conduct occurred when, or so that, his conduct in fact impeded or disrupted the orderly conduct of Government business or official functions.

“Disorderly conduct” occurs when a person is unreasonably loud and disruptive under the circumstances, or interferes with another person by jostling against or unnecessarily crowding that person.

“Disruptive conduct” is a disturbance that interrupts an event, activity, or the normal course of a process.<sup>4</sup>

The terms “restricted building” and “knowingly” have the same meanings described in the instructions for Count One.

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<sup>3</sup> 18 U.S.C. § 1752.

<sup>4</sup> Redbook 6.643.

**DEFENDANT'S PROPOSAL**

**Proposed Instruction No. 20**

18 U.S.C. 1752(a)(2)

[Adapted from D.C. Redbook Instruction 6.643 for D.C. Code § 10-503.16(b)(4)]

In order for you to find the Defendant guilty of this charge, the Government must prove each of the following elements beyond a reasonable doubt;

- First, that the Defendant engaged in disorderly or disruptive conduct.
- Second, that the conduct occurred in, or in proximity to, a restricted building or grounds.
- Third, that the Defendant acted voluntarily and on purpose, and not by mistake or accident.
- Fourth, that the Defendant acted with the intent to impede, disrupt, or disturb the orderly conduct of Government business or official functions.
- Fifth, that the Defendant's conduct actually impeded or disrupted the orderly conduct of Government business or official functions.

With regard to the first element, "disorderly conduct" occurs when a person acts in such a manner as to cause another person to be in reasonable fear that a person or property in a person's immediate possession is likely to be harmed or taken, uses words likely to produce violence on the part of others, is unreasonably loud and disruptive under the circumstances, or interferes with another person by jostling against or unnecessarily crowding that person.

"Disruptive conduct" is a disturbance that interrupts an event, activity, or the normal course of a process.

With regard to the second element, an area of the Capitol or Capitol grounds was restricted if it was physically demarcated at the time when the Defendant was in, or in close proximity to, the building or grounds. See *United States v. Bursey*, 416 F.3d 301, 307 (4th Cir. 2005) (declining to decide whether the boundaries must be physically demarcated).

Additionally, the area must have been restricted because the President or other person protected by the Secret Service was or would be temporarily visiting; or because of an event designated as a special event of national significance. 18 U.S.C. § 1752(c)(1)(B-C).

**GOVERNMENT’S PROPOSAL**

**Proposed Instruction No. 21**

**VIOLENT ENTRY OR DISORDERLY CONDUCT IN A CAPITOL BUILDING**

40 U.S.C. § 5104(e)(2)(D)

Count Three of the Information charges the defendant with disorderly and disruptive conduct in a Capitol Building, which is a violation of federal law.

In order to find the defendant guilty of this offense, you must find that the government proved each of the following elements beyond a reasonable doubt:

1. First, that the defendant engaged in disorderly or disruptive conduct in any of the United States Capitol Buildings.
2. Second, that the defendant did so with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress.
3. Third, that the defendant acted willfully and knowingly.

The term “United States Capitol Buildings” includes the United States Capitol located at First Street, Southeast, in Washington, D.C.<sup>5</sup>

The term “disorderly or disruptive conduct” has the same meaning described in the instructions for Count Two defining “disorderly conduct” and “disruptive conduct.”

A person acts “willfully” if he acts with the intent to do something that the law forbids, that is, to disobey or disregard the law. “Willfully” does not, however, require proof that the defendant be aware of the specific law or rule that his conduct may be violating.<sup>6</sup>

The term “knowingly” has the same meaning described in the instructions for Count One.

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<sup>5</sup> 40 U.S.C. § 5101

<sup>6</sup> *See United States v. Bryan*, 524 U.S. 184, 190 (1998).

**DEFENDANT'S PROPOSAL**

**Proposed Instruction No. 21**

18 U.S.C. § 5104(e)(2)(D)

[Adapted from D.C. Redbook Instruction 6.643 for D.C. Code § 10-503.16(b)(4)]

In order for you to find the Defendant guilty of this charge, the Government must prove each of the following elements beyond a reasonable doubt;

- First, that the Defendant uttered loud, threatening, or abusive language or engaged in disorderly or disruptive conduct.
- Second, that the Defendant's conduct occurred on the United States Capitol grounds or in a United States Capitol building.
- Third, that the Defendant acted voluntarily and on purpose, and not by mistake or accident.
- Fourth, that the Defendant acted with the intent to impede, disrupt, or disturb the orderly conduct of a session of the United States Congress.
- Fifth, that the Defendant's conduct was more disruptive than that of tourists or others routinely permitted in the United States Capitol buildings or on the United States Capitol grounds.

With regard to the first element, "disorderly conduct" occurs when a person acts in such a manner as to cause another person to be in reasonable fear that a person or property in a person's immediate possession is likely to be harmed or taken, uses words likely to produce violence on the part of others, is unreasonably loud and disruptive under the circumstances, or interferes with another person by jostling against or unnecessarily crowding that person.

“Disruptive conduct” is a disturbance that interrupts an event, activity, or the normal course of a process.

With regard to the fifth element, one acts more disruptive than tourists when he is excessively nosy, violent, armed, or disorderly, or has the purpose to interfere with the processes of the Congress, any member of Congress, congressional employee, visitor, or tourist. *Hasty v. United States*, 669 A.2d 127, 130, 133 (D.C. 1995).

**GOVERNMENT’S PROPOSAL**

**Proposed Instruction No. 22**

**PARADING, DEMONSTRATING, OR PICKETING IN A CAPITOL BUILDING**

40 U.S.C. § 5104(e)(2)(G)

Count Four of the Information charges the defendant with parading, demonstrating, or picketing in a Capitol Building, which is a violation of federal law.

In order to find the defendant guilty of this offense, you must find that the government proved each of the following elements beyond a reasonable doubt:

1. First, that the defendant paraded, demonstrated, or picketed in any of the United States Capitol Buildings.
2. Second, that the defendant acted willfully and knowingly.

The terms “parade” and “picket” have their ordinary meanings. The term “demonstrate” refers to conduct that would disrupt the orderly business of Congress by, for example, impeding or obstructing passageways, hearings, or meetings, but does not include activities such as quiet praying.<sup>7</sup>

The terms “United States Capitol Buildings,” “knowingly,” and “willfully” have the same meanings described in the instructions for Counts One and Three.

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<sup>7</sup> *Bynum v. United States Capitol Police Board*, 93 F. Supp. 2d 50, 58 (D.D.C. 2000).

**DEFENDANT'S PROPOSAL**

**Proposed Instruction No. 22**

18 U.S.C. § 5104(e)(2)(G)

[Adapted from D.C. Redbook Instruction 6.644 for D.C. Code § 10-5-3.16(b)(7)]

In order for you to find the Defendant guilty of this charge, the Government must prove each of the following elements beyond a reasonable doubt;

- First, that the Defendant paraded, demonstrated, or picketed.
- Second, that the Defendant's conduct occurred in a United States Capitol building.
- Third, that the Defendant acted voluntarily and on purpose, and not by mistake or accident, and with knowledge that his actions were prohibited by law.
- Fourth, that the Defendant's conduct was more disruptive than that of tourists or others routinely permitted in the United States Capitol buildings.

With regard to the first element, demonstrating means speechmaking, holding of vigils, sit-ins or other activities conducted for the purpose of demonstrating approval or disapproval of government policies or practices or lack thereof, expressing a view on public issues, or bringing into public notice any issue or other matter. *See Markowitz v. United States*, 598 A.2d 398, 408 (D.C. 1991).

With regard to the third element, while the government must show that the defendant knew that his/her conduct was unlawful, it is not necessary for the government to show that the defendant was aware of the specific law, rule, or regulation that the conduct may have violated.

With regard to the fourth element, one acts more disruptive than tourists when he is excessively nosy, violent, armed, or disorderly, or has the purpose to interfere with the processes of the Congress, any member of Congress, congressional employee, visitor, or tourist. *Hasty v. United States*, 669 A.2d 127, 130, 133 (D.C. 1995).

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**PROPOSED VERDICT FORM**

We, the jury in the above-titled case, find the defendant [circle one]:

Count One: Guilty / Not Guilty of Entering or Remaining in a Restricted Building, in violation of 18 U.S.C. § 1752(a)(1).

Count Two: Guilty / Not Guilty of Disorderly or Disruptive Conduct in a Restricted Building, in violation of 18 U.S.C. § 1752(a)(2).

Count Three: Guilty / Not Guilty of Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D).

Count Four: Guilty / Not Guilty of Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(G).

Dated: \_\_\_\_\_

\_\_\_\_\_  
Signature of Foreperson

Respectfully submitted,

FOR THE DEFENDANT

/s/ Peter M. Carter  
Peter M. Carter, Esquire

DATE: December 16, 2022

FOR THE UNITED STATES

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