

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	MAGISTRATE NO. 1:22-MJ-133-ZMF
	:	
RYAN KELLEY,	:	VIOLATIONS:
	:	18 U.S.C. § 1752(a)(1) - Knowingly
Defendant.	:	Entering or Remaining in any Restricted
	:	Building or Grounds
	:	Without Lawful Authority,
	:	18 U.S.C. § 1752(a)(2) - Disorderly and
	:	Disruptive Conduct in a Restricted
	:	Building or Grounds,
	:	18 U.S.C. § 1752(a)(4) - Knowingly Engage
	:	in any Act of Physical Violence Against
	:	Person or Property in any Restricted
	:	Building or Grounds,
	:	18 U.S.C. § 1361 - Destruction of
	:	Government Property

INFORMATION

The United States Attorney charges that:

COUNT ONE

On or about January 6, 2021, in the District of Columbia, **RYAN KELLEY** 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 was and would be temporarily visiting, without lawful authority to do so.

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

COUNT TWO

On or about January 6, 2021, in the District of Columbia, **RYAN KELLEY** did knowingly, and with intent to impede and disrupt the orderly conduct of Government business and official

functions, engage 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 was and would be 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 or Grounds, in violation of Title 18, United States Code, Section 1752(a)(2))

COUNT THREE

On or about January 6, 2021, in the District of Columbia, **RYAN KELLEY** willfully and knowingly engaged in any act of physical violence against person or property, in any restricted building or grounds, where the Vice President was and would be temporarily visiting, 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.

(Knowingly Engage in any Act of Physical Violence Against Person or Property in any Restricted Building or Grounds in violation of Title 18, United States Code, Section 1752(a)(4))

COUNT FOUR

On or about January 6, 2021, in the District of Columbia, **RYAN KELLEY** did willfully injure and commit depredation, and did attempt to do the same, against property of the United States, and of any department and agency thereof, and any property which has been and is being manufactured and constructed for the United States, and any department or agency thereof, that is the tarp covering the northwest scaffolding of the United States Capitol Building, causing damage in an amount less than \$1,000.

(Destruction of Government Property, in violation of Title 18, United States Code, Sections 1361 and 2)

Dated: June 22, 2022

Respectfully submitted,

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D.C. Bar No. 481052

By: /s/ April Ayers-Perez
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