

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
North Carolina Bar No. 44691
Special Assistant United States Attorney
555 4th Street, N.W.
Washington, D.C. 20530
Telephone No. (202) 262-7359
James.Pearce@usdoj.gov