

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>Case No. 1:21-cr-85-CRC</b>
<b>v.</b>	:	
	:	
<b>JOHN HERBERT STRAND, and</b>	:	
<b>SIMONE MELISSA GOLD</b>	:	
	:	
<b>Defendants.</b>	:	

**ORDER**

This matter has come before the Court pursuant to the Government’s Unopposed Motion to Strike Portions of the Indictment. The Government moves to amend the charging language in Counts Two and Three, which charge violations of Section 1752. Specifically, the Government requests that the Court amend the reference in Counts Two and Three to “where the Vice President and Vice President-elect were temporarily visiting” to “where the Vice President was temporarily visiting” in both counts. Defendant does not oppose this Motion.

**IT IS HEREBY ORDERED** that the Court hereby **GRANTS** the Government’s Unopposed Motion to Strike Portions of the Indictment, and amend the reference to “where the Vice President and Vice President-elect were temporarily visiting” to “where the Vice President was temporarily visiting” in Counts Two and Three of the Indictment so that Counts Two and Three state as follows:

**COUNT TWO**

On or about January 6, 2021, in the District of Columbia, **JOHN HERBERT STRAND AND SIMONE MELISSA GOLD**, did unlawfully and 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 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 THREE**

On or about January 6, 2021, in the District of Columbia, **JOHN HERBERT STRAND AND SIMONE MELISSA GOLD**, 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 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))

**SO ORDERED.**

DATE: March 1, 2022

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Christopher R. Cooper  
U.S. DISTRICT COURT JUDGE