

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

|                          |   |   |
|--------------------------|---|---|
| UNITED STATES OF AMERICA | : | CRIMINAL NO. 21-CR-131                    |
|                          | : |   |
| v.                       | : |   |
|                          | : | MAGISTRATE NO. 21-MJ-148, 01, 02          |
| JASON GERDING,           | : |   |
| CHRISTINA GERDING        | : | <b>VIOLATIONS:</b>                        |
|                          | : | 18 U.S.C. § 1752(a)(1)                    |
| Defendants.              | : | (Entering and Remaining in a Restricted   |
|                          | : | Building or Grounds)                      |
|                          | : | 18 U.S.C. § 1752(a)(2)                    |
|                          | : | (Disorderly and Disruptive Conduct in a   |
|                          | : | Restricted Building or Grounds)           |
|                          | : | 40 U.S.C. § 5104(e)(2)(D)                 |
|                          | : | (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 at all relevant times:

**COUNT ONE**

On or about January 6, 2021, in the District of Columbia, **JASON GERDING** and **CHRISTINA GERDING**, 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))

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA: CRIMINAL NO. 21-CR-131: v.: MAGISTRATE NO. 21-MJ-148, 01, 02 JASON GERDING,: CHRISTINA GERDING: VIOLATIONS:: 18 U.S.C. § 1752(a)(1) Defendants.: (Entering and Remaining in a Restricted Building or Grounds): 18 U.S.C. § 1752(a)(2): (Disorderly and Disruptive Conduct in a Restricted Building or Grounds): 40 U.S.C. § 5104(e)(2)(D): (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 at all relevant times: COUNT ONE On or about January 6, 2021, in the District of Columbia, JASON GERDING and CHRISTINA GERDING, 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, JASON GERDING and CHRISTINA GERDING, 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 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, JASON GERDING and CHRISTINA GERDING, 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. (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, in the District of Columbia, JASON GERDING and CHRISTINA GERDING, 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, MATTHEW M. GRAVES United States Attorney DC Bar No. 481052 By: /s/ Anthony L. Franks ANTHONY L. FRANKS Missouri Bar No. 50217MO Assistant United States Attorney Detailee-Federal Major Crimes United States Attorney's Office and Deputy United States Attorney, Department of Justice, Federal Bureau of Investigation, 1000 L Street SE, Suite 1000, Washington, DC 20003 Telephone No. (314) 399-3995 anthony.franks@usdoj.gov

**COUNT THREE**

On or about January 6, 2021, in the District of Columbia, **JASON GERDING** and **CHRISTINA GERDING**, 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.

**(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, in the District of Columbia, **JASON GERDING** and **CHRISTINA GERDING**, 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,

MATTHEW M. GRAVES  
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