

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	MAGISTRATE NO. 21-MJ-041
	:	
MICHAEL DAUGHTRY,	:	VIOLATIONS:
	:	18 U.S.C. § 1752(a)(1)
Defendant.	:	(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)
	:	18 U.S.C. §§ 1752(a)(3), 2
	:	(Impeding Ingress and Egress in a
	:	Restricted Building or Grounds and
	:	Aiding and Abetting)

INFORMATION

The United States charges that:

COUNT ONE

On or about January 6, 2021, within the District of Columbia, **MICHAEL DAUGHTRY**, unlawfully and knowingly entered and remained 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 and Vice President-elect were 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, **MICHAEL DAUGHTRY**, 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 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, **MICHAEL DAUGHTRY**, knowingly, and with intent to impede and disrupt the orderly conduct of Government business and official functions, obstructed and impeded ingress and egress to and from 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.

(Impeding Ingress and Egress in a Restricted Building or Grounds and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1752(a)(3) and 2)

Respectfully submitted,

MICHAEL R. SHERWIN
ACTING UNITED STATES ATTORNEY
NEW YORK BAR NO. 4444188

By: /s/ Ahmed Baset
Ahmed M. Baset
IL Bar No. 630-4552
Assistant United States Attorney
555 4th Street, N.W. Room #3626
Washington, DC 20530
202-252-7097
ahmed.baset@usdoj.gov