

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	CRIM NO.
	:	
v.	:	MAGISTRATE NO. 21-MJ-150
	:	21-MJ-220
ZACHARY HAYES MARTIN,	:	21-MJ-221
also known as ZAC MARTIN,	:	21-MJ-219
	:	VIOLATIONS:
MICHAEL QUICK,	:	18 U.S.C. § 1752(a)(1)
	:	(Entering and Remaining in a Restricted
STEPHEN QUICK, and	:	Building or Grounds)
	:	18 U.S.C. § 1752(a)(2)
KARI KELLEY,	:	(Disorderly and Disruptive Conduct in a
Defendants.	:	Restricted Building or Grounds)
	:	40 U.S.C. § 5104(e)(2)(D)
	:	(Disorderly Conduct in a Capitol Building
	:	or Grounds)
	:	40 U.S.C. § 5104(e)(2)(G)
	:	(Parading, Demonstrating, or Picketing in
	:	a Capitol Building)

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**AMENDED INFORMATION**

The United States Attorney charges that at all relevant times:

**COUNT ONE**

On or about January 6, 2021, in the District of Columbia, **ZACHARY HAYES MARTIN, also known as, ZAC MARTIN, MICHAEL QUICK, STEPHEN QUICK and KARI KELLEY**, did unlawfully and knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off, or 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, **ZACHARY HAYES MARTIN, also known as, ZAC MARTIN, MICHAEL QUICK, STEPHEN QUICK and KARI 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, or 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, **ZACHARY HAYES MARTIN, also known as, ZAC MARTIN, MICHAEL QUICK, STEPHEN QUICK and KARI KELLEY**, willfully and knowingly engaged in disorderly and disruptive conduct in any of the Capitol Buildings or Grounds 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 or Grounds, 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, **ZACHARY HAYES MARTIN, also known as, ZAC MARTIN, MICHAEL QUICK, STEPHEN QUICK and KARI KELLEY**, 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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D.C. Bar No. 481052

By: /s/ Brenda J. Johnson  
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