

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, **VAUGHN GORDON**, 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 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, **VAUGHN GORDON**, willfully and knowingly paraded, demonstrated, and picketed in a 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,

MICHAEL R. SHERWIN
Acting United States Attorney
N.Y. Bar No. 4444188

By: 
MARY L. DOHRMANN
N.Y. Bar No. 5443874
555 4th Street, N.W.
Washington, D.C. 20530
Phone: (202) 252-7035
Email: Mary.Dohrmann@usdoj.gov