

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on January 8, 2021

UNITED STATES OF AMERICA	:	CRIMINAL NO. 21-CR-79 (BAH)
	:	
v.	:	
	:	
KEVIN JAMES LYONS,	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 1752(a)(1)</b>
Defendant.	:	<b>(Entering and Remaining in a Restricted</b>
	:	<b>Building or Grounds)</b>
	:	<b>18 U.S.C. § 1752(a)(2)</b>
	:	<b>(Disorderly and Disruptive Conduct in a</b>
	:	<b>Restricted Building or Grounds)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(C)</b>
	:	<b>(Entering and Remaining in Certain</b>
	:	<b>Rooms in the Capitol Building)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(D)</b>
	:	<b>(Disorderly Conduct in a Capitol</b>
	:	<b>Building)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(G)</b>
	:	<b>(Parading, Demonstrating, or Picketing</b>
	:	<b>in a Capitol Building)</b>
	:	<b>18 U.S.C. §§ 1512(c)(2), 2</b>
	:	<b>(Obstruction of an Official Proceeding</b>
	:	<b>and Aiding and Abetting Obstruction of</b>
	:	<b>an Official Proceeding)</b>

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about January 6, 2021, within the District of Columbia, **KEVIN JAMES LYONS**, did knowingly enter and remain in the United States Capitol, a restricted building, without lawful authority to do so.

**(Entering and Remaining in a Restricted Building**, in violation of Title 18, United States Code, Section 1752(a)(1))

**COUNT TWO**

On or about January 6, 2021, within the District of Columbia, **KEVIN JAMES LYONS**, 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 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, within the District of Columbia, **KEVIN JAMES LYONS**, willfully and knowingly, and with the intent to disrupt the orderly conduct of official business, entered and remained in a room in any of the Capitol Buildings set aside and designated for the use of either House of Congress and a Member, committee, officer, and employee of Congress, and either House of Congress, and the Library of Congress, without authorization to do so.

**(Entering and Remaining in Certain Rooms in the Capitol Building**, in violation of Title 40, United States Code, Section 5104(e)(2)(C))

**COUNT FOUR**

On or about January 6, 2021, within the District of Columbia, **KEVIN JAMES LYONS**, willfully and knowingly engaged in disorderly and disruptive conduct at any place in the Grounds and 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.

**(Disorderly Conduct at the Grounds and in a Capitol Building**, in violation of Title 40, United States Code, Section 5104(e)(2)(D))

**COUNT FIVE**

On or about January 6, 2021, within the District of Columbia, **KEVIN JAMES LYONS**, 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))

**COUNT SIX**

On or about January 6, 2021, within the District of Columbia and elsewhere, **KEVIN JAMES LYONS**, attempted to, and did, corruptly obstruct, influence, and impede an official proceeding, that is, a proceeding before Congress, specifically, Congress's certification of the Electoral College vote as set out in the Twelfth Amendment of the Constitution of the United States and 3 U.S.C. §§ 15-18.

**(Obstruction of an Official Proceeding and Aiding and Abetting**, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2)

A TRUE BILL:

FOREPERSON.

A handwritten signature in black ink, appearing to read "Channing D. Phillips" followed by a stylized monogram or initials.

Attorney of the United States in  
and for the District of Columbia.