

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	CRIMINAL NO.
	:	
Plaintiff,	:	MAGISTRATE NO.: 21-mj-521
	:	
v.	:	VIOLATIONS:
	:	
KRISTI MUNN (AKA: KRISTI MARIE	:	18 U.S.C. § 1752(a)(1)
MUNN), THOMAS MUNN (AKA: TOM	:	(Entering and Remaining in a Restricted
MUNN), DAWN MUNN, JOSHUA	:	Building or Grounds)
MUNN (AKA: JOSH MUNN), AND	:	18 U.S.C. § 1752(a)(2)
KAYLI MUNN,	:	(Disorderly and Disruptive Conduct in a
	:	Restricted Building or Grounds)
Defendants.	:	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:

**COUNT ONE**

On or about January 6, 2021, in the District of Columbia, **Kristi Munn (AKA: Kristi Marie Munn), Thomas Munn (AKA: Tom Munn), Dawn Munn, Joshua Munn (AKA: Josh Munn), and Kayli Munn**, did unlawfully and 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 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, **Kristi Munn (AKA: Kristi Marie Munn), Thomas Munn (AKA: Tom Munn), Dawn Munn, Joshua Munn (AKA:**

**Josh Munn**), and **Kayli Munn**, 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, in the District of Columbia, **Kristi Munn (AKA: Kristi Marie Munn)**, **Thomas Munn (AKA: Tom Munn)**, **Dawn Munn**, **Joshua Munn (AKA: Josh Munn)**, and **Kayli Munn**, 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, **Kristi Munn (AKA: Kristi Marie Munn)**, **Thomas Munn (AKA: Tom Munn)**, **Dawn Munn**, **Joshua Munn (AKA: Josh Munn)**, and **Kayli Munn**, 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))

Date: July 16, 2021

Respectfully submitted,

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY

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