



**COUNT TWO**

On or about January 6, 2021, within the District of Columbia, **MICHAEL TIMBROOK** 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**, 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 TIMBROOK**, 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, **MICHAEL TIMBROOK**, willfully and knowingly engaged in disorderly and disruptive conduct within the United States Capitol Grounds and 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.

**(Violent Entry and Disorderly Conduct 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, **MICHAEL TIMBROOK**, 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,

Channing D. Phillips  
Acting U.S. Attorney  
D.C. Bar No. 415793

*/s/Lucy Sun*

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