# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : CRIMINAL NO.

:

v. : MAGISTRATE NO. 21-MJ-677 (GMH)

:

THOMAS PAUL CONOVER, : VIOLATIONS:

: 18 U.S.C. § 1752(a)(1)

Defendant. : (Entering and Remaining in a Restricted

Building or Grounds)18 U.S.C. § 1752(a)(2)

: (Disorderly and Disruptive Conduct in a

: Restricted Building or Grounds)

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 at all relevant times:

#### **COUNT ONE**

On or about January 6, 2021, in the District of Columbia, **THOMAS PAUL CONOVER**, did 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 was temporarily visiting, without lawful authority to do so.

(Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1))

## **COUNT TWO**

On or about January 6, 2021, in the District of Columbia, **THOMAS PAUL CONOVER**, 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 was 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 18 U.S.C. § 1752(a)(2))

## **COUNT THREE**

On or about January 6, 2021, in the District of Columbia, **THOMAS PAUL CONOVER**, 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.

(Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D))

#### **COUNT FOUR**

On or about January 6, 2021, in the District of Columbia, **THOMAS PAUL CONOVER**, willfully and knowingly paraded, demonstrated, and picketed in any United States Capitol Building.

(**Parading, Demonstrating, or Picketing in a Capitol Building**, in violation of 40 U.S.C. § 5104(e)(2)(G))

Respectfully submitted,

MATTHEW M. GRAVES United States Attorney D.C. Bar No. 481052

By:

Sean P. Murphy
Assistant United States Attorney
D.C. Bar No. 1187821
Torre Chardon, Ste 1201
350 Carlos Chardon Avenue
San Juan, PR 00918
787-766-5656
sean.murphy@usdoj.gov