UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	MAGISTRATE NO. 23-MJ-122
KENNETH WAYNE FULLER,	:	VIOLATIONS:
CALEB WAYNE FULLER, and	:	
NICHOLAS JOHN FULLER,	:	18 U.S.C. § 1752(a)(1)
	:	(Entering and Remaining in a Restricted
Defendants.	:	Building or Grounds)
	:	18 U.S.C. § 1752(a)(2)
	:	(Disorderly and Disruptive Conduct in a
	:	Restricted Building or Grounds)

INFORMATION

The United States Attorney charges that:

COUNT ONE

On or about January 6, 2021, in the District of Columbia, Kenneth Wayne Fuller, Caleb

Wayne Fuller, and **Nicholas John Fuller**, 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 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, Kenneth Wayne Fuller, Caleb

Wayne Fuller, and **Nicholas John Fuller**, 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

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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 Title 18, United States Code, Section 1752(a)(2))

Respectfully submitted,

MATTHEW M. GRAVES United States Attorney DC Bar No. 481052 CYTHERIA D. JERNIGAN DC Bar No. 494742 Assistant U.S. Attorney, WDLA Detailed to the U.S. Attorney's Office for the District of Columbia 601 D. Street, N.W. Washington, D.C. 20530 (318) 676-3663 (f) Cytheria.Jernigan@usdoj.gov

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By: