

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on March 16, 2023

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	
	:	VIOLATIONS:
JAY JAMES JOHNSTON,	:	
ALAN MICHAEL ST. ONGE,	:	18 U.S.C. § 231(a)(3) and 2
KYLE KUMER, and	:	(Civil Disorder)
WILLIAM STOVER, also known as	:	
“JESSIE,”	:	18 U.S.C. § 1752(a)(1)
	:	(Entering and Remaining in a Restricted
	:	Building or Grounds)
Defendants.	:	
	:	18 U.S.C. § 1752(a)(2)
	:	(Disorderly and Disruptive Conduct in a
	:	Restricted Building or Grounds)
	:	
	:	40 U.S.C. § 5104(e)(2)(E)
	:	(Impeding Passage Through the Capitol
	:	Grounds or Buildings)

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

On or about January 6, 2021, within the District of Columbia, **JAY JAMES JOHNSTON, ALAN MICHAEL ST. ONGE, KYLE KUMER, and WILLIAM STOVER, also known as “JESSIE,”** committed and attempted to commit an act to obstruct, impede, and interfere with a law enforcement officer, lawfully engaged in the lawful performance of his/her official duties incident to and during the commission of a civil disorder which in any way and degree obstructed,

delayed, and adversely affected commerce and the movement of any article and commodity in commerce and the conduct and performance of any federally protected function.

**(Civil Disorder and Aiding and Abetting**, in violation of Title 18, United States Code, Sections 231(a)(3) and 2)

**COUNT TWO**

On or about January 6, 2021, in the District of Columbia, **JAY JAMES JOHNSTON, ALAN MICHAEL ST. ONGE, KYLE KUMER, and WILLIAM STOVER, also known as “JESSIE,”** 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 and would be 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 THREE**

On or about January 6, 2021, in the District of Columbia, **JAY JAMES JOHNSTON, ALAN MICHAEL ST. ONGE, KYLE KUMER, and WILLIAM STOVER, also known as “JESSIE,”** 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 and would be 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 FOUR**

On or about January 6, 2021, in the District of Columbia, **JAY JAMES JOHNSTON, ALAN MICHAEL ST. ONGE, KYLE KUMER, and WILLIAM STOVER, also known as “JESSIE,”** willfully and knowingly obstructed, and impeded passage through and within, the United States Capitol Grounds and any of the Capitol Buildings.

**(Impeding Passage Through the Capitol Grounds or Buildings, in violation of Title 40, United States Code, Section 5104(e)(2)(E))**

A TRUE BILL:

FOREPERSON.

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