

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**JUAN RODRIGUEZ,
ALEXANDER FAN,
Defendants.**

CASE NO.

VIOLATIONS:

18 U.S.C. § 1752(a)(1)

**(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)(C)

**(Enter and Remain in a Room in a Capitol
Building)**

40 U.S.C. § 5104(e)(2)(D)

**(Disorderly Conduct in a Capitol Building
or Grounds)**

40 U.S.C. § 5104(e)(2)(E)

**(Obstruct or Impede Passage 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, **JUAN RODRIGUEZ** and **ALEXANDER FAN** 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, 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, **JUAN RODRIGUEZ** and **ALEXANDER FAN** 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, 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, **JUAN RODRIGUEZ** and **ALEXANDER FAN** 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 or Grounds, 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, **JUAN RODRIGUEZ** and **ALEXANDER FAN** willfully and knowingly entered and remained in a room in a United States Capitol Building set aside and designated for the use of either House of Congress or a Member, committee, officer, or employee of Congress, or either House of Congress, with the intent to

disrupt the orderly conduct of official business.

(Enter and Remain in a Room in a Capitol Building, in violation of Title 40, United States Code, Section 5104(e)(2)(C)(i))

COUNT FIVE

On or about January 6, 2021, in the District of Columbia, **JUAN RODRIGUEZ** and **ALEXANDER FAN** willfully and knowingly obstruct, or impede passage through and within a United States Capitol Building.

(Obstruct and Impede Passage in a Capitol Building, in violation of Title 40, United States Code, Section 5104(e)(2)(E))

Respectfully submitted,

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

By:



ALEXANDRA F. FOSTER
D.C. Bar No. 470096
Attorney, detailed to the
United States Attorney's Office for the
District of Columbia
601 D Street NW
Washington, DC 20530