IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

:

:

:

:

: CASE NO.

UNITED STATES OF AMERICA

VIOLATIONS:

V.

40 U.S.C. § 5104(e)(2)(D)

SARAH KATHLEEN HOLMES

(Disorderly Conduct in a Capitol Building

: or Grounds)

Defendant.

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, SARAH KATHLEEN HOLMES 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 TWO

On or about January 6, 2021, in the District of Columbia, SARAH KATHLEEN HOLMES

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,

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

By: /s/ Thomas D. Campbell
Thomas D. Campbell
Trial Attorney
Criminal Division, Fraud Section
U.S. Department of Justice
1400 New York Ave. NW
Washington, D.C. 20005
(202) 262 – 7778
thomas.campbell@usdoj.gov