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

UNITED STATES OF AMERICA : CRIMINAL NO. 21-CR-050-01-03 (CRC)

:

v. :

:

JENNIFER LEIGH RYAN, : VIOLATIONS:

JASON LEE HYLAND, : 18 U.S.C. § 1752(a)(1)

KATHERINE STAVELEY SCHWAB, : (Entering and Remaining in a Restricted

: Building)

Defendants. : 18 U.S.C. § 1752(a)(2)

(Disorderly and Disruptive Conduct in a

: Restricted Building): 40 U.S.C. § 5104(e)(2)(D)

: (Violent Entry and Disorderly Conduct in

: a Capitol Building)

: 40 U.S.C. § 5104(e)(2)(G)

: (Parading, Demonstrating, or Picketing in

a Capitol Building)

: 40 U.S.C. § 5104(e)(2)(F)

: (Act of Physical Violence in the Grounds)

## **INFORMATION**

The United States Attorney charges that at all relevant times:

#### **COUNT ONE**

On or about January 6, 2021, within the District of Columbia, **JENNIFER LEIGH RYAN**, **JASON LEE HYLAND**, and **KATHERINE STAVELEY SCHWAB**, did knowingly enter and remain in the United States Capitol, a restricted building, 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, within the District of Columbia, JENNIFER LEIGH RYAN, JASON LEE HYLAND, and KATHERINE STAVELEY SCHWAB, knowingly, and

with intent to impede and disrupt the orderly conduct of Government business and official functions, engaged in disorderly and disruptive conduct in and within such proximity to, the United States Capitol, a restricted building, 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, within the District of Columbia, **JENNIFER LEIGH RYAN**, **JASON LEE HYLAND**, and **KATHERINE STAVELEY SCHWAB**, willfully and knowingly engaged in disorderly and disruptive conduct in any of the Capitol Buildings with the intent to impede, disrupt, and disturb the orderly conduct of a session of Congress or either House of Congress.

(Violent Entry and Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, Section 5104(e)(2)(D))

## **COUNT FOUR**

On or about January 6, 2021, within the District of Columbia, **JENNIFER LEIGH RYAN**, **JASON LEE HYLAND**, and **KATHERINE STAVELEY SCHWAB**, willfully and knowingly paraded, demonstrated, and picketed in a Capitol Building.

(Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, Section 5104(e)(2)(G))

## **COUNT FIVE**

On or about January 6, 2021, within the District of Columbia, **KATHERINE STAVELEY SCHWAB**, willfully and knowingly engaged in an act of physical violence in the Grounds or any of the Capitol Buildings.

(Act of Physical Violence in the Grounds, in violation of Title 40, United States Code, Section 5104(e)(2)(F))

Respectfully submitted,

CHANNING D. PHILLIPS Acting United States Attorney D.C. Bar No. 415793

By: /s/ Frances E. Blake

FRANCES E. BLAKE
Texas Bar No. 24089236
Assistant United States Attorney
District of Columbia
Capitol Riot Detailee
555 4th Street, N.W.
Washington, D.C. 20530
Telephone No. 956-250-9594
Email: Frances.Blake@usdoj.gov