

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

**UNITED STATES OF AMERICA**

**: MAGISTRATE NO. 21-MJ-012**

**:**

**v.**

**:**

**:**

**VIOLATIONS:**

**CINDY FITCHETT,**

**:**

**18 U.S.C. § 1752(a)(1)**

**MICHAEL CURZIO,**

**:**

**(Entering and Remaining in a Restricted**

**DOUGLAS SWEET,**

**:**

**Building)**

**TERRY BROWN,**

**:**

**18 U.S.C. § 1752(a)(2)**

**BRADLEY RUKSTALES, and**

**:**

**(Disorderly and Disruptive Conduct in a**

**THOMAS GALLAGHER,**

**:**

**Restricted Building)**

**Defendants.**

**:**

**(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)**

**AMENDED INFORMATION**

The United States Attorney charges that at all relevant times:

**COUNT ONE**

On or about January 6, 2021, in the District of Columbia, **TERRY BROWN, MICHAEL CURZIO, CINDY FITCHETT, THOMAS GALLAGHER, BRADLEY RUKSTALES,** and **DOUGLAS SWEET**, knowingly entered and remained 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, in the District of Columbia, **TERRY BROWN, MICHAEL CURZIO, CINDY FITCHETT, THOMAS GALLAGHER, BRADLEY RUKSTALES**, and **DOUGLAS SWEET**, 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, in the District of Columbia, **TERRY BROWN, MICHAEL CURZIO, CINDY FITCHETT, THOMAS GALLAGHER, BRADLEY RUKSTALES**, and **DOUGLAS SWEET**, 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, in the District of Columbia, **TERRY BROWN, MICHAEL CURZIO, CINDY FITCHETT, THOMAS GALLAGHER, BRADLEY RUKSTALES**, and **DOUGLAS SWEET**, 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))

Respectfully submitted,

MICHAEL R. SHERWIN  
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By:   
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