

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

**UNITED STATES OF AMERICA**

**v.**

**MARK SIMON,**

**Defendant.**

**: MAGISTRATE NO. 21-MJ-147**  
**:**  
**:**  
**: 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)(D)**  
**: (Disorderly Conduct in a Capitol Building**  
**: or Grounds)**  
**: 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, **MARK SIMON** did unlawfully and knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off, or otherwise restricted area within the United States Capitol and its grounds, where the Vice President and Vice President-elect were 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 TWO**

On or about January 6, 2021, in the District of Columbia, **MARK SIMON** 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, or otherwise restricted area within the United States Capitol and its grounds, where the Vice President and Vice President-elect were 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 THREE**

On or about January 6, 2021, in the District of Columbia, **MARK SIMON** willfully and knowingly engaged in disorderly and disruptive conduct in any of the Capitol Buildings or Grounds 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, **MARK SIMON** 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,

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