

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CASE NO.</b>
	:	
<b>v.</b>	:	
	:	
<b>JAMES RAY EPPS, SR.</b>	:	<b>VIOLATION:</b>
	:	<b>18 U.S.C. § 1752(a)(2)</b>
<b>Defendant.</b>	:	<b>(Disorderly or Disruptive Conduct in a</b>
	:	<b>Restricted Building or Grounds)</b>
	:	
	:	

**INFORMATION**

The United States Attorney charges that:

**COUNT ONE**

On or about January 6, 2021, within the District of Columbia, **JAMES RAY EPPS, SR.** 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, and attempted and conspired to do so.

**(Disorderly or Disruptive Conduct in a Restricted Building or Grounds, in violation of Title 18, United States Code, Section 1752(a)(2))**

Respectfully submitted,

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

By: /s/ Michael M. Gordon  
MICHAEL M. GORDON  
Assistant United States Attorney, Detailee  
Florida Bar No. 1026025  
400 N. Tampa St., Suite 3200  
Tampa, Florida 33602  
(813) 274-6370  
michael.gordon3@usdoj.gov