UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on February 14, 2022

:

UNITED STATES OF AMERICA : CRIMINAL NO. 21-CR-287 (TNM)

v. : VIOLATIONS: : 18 U.S.C. §§ 1512(c)(2), 2

KEVIN SEEFRIED, and : (Obstruction of an Official Proceeding)

HUNTER SEEFRIED, : 18 U.S.C. § 1752(a)(1)

: (Entering and Remaining in a Restricted

Defendants. : 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)

: 40 U.S.C. § 5104(e)(2)(G)

: (Parading, Demonstrating, or Picketing in

: a Capitol Building) : 18 U.S.C. § 1752(a)(4)

: (Entering and Remaining in a Restricted

: Building or Grounds with Physical

: Violence Against Property)

: 18 U.S.C. § 1361, 2

: (Destruction of Government Property)

: 40 U.S.C. § 5104(e)(2)(F)

: (Act of Physical Violence in the Capitol

: Grounds or Building)

INDICTMENT

:

The Grand Jury charges that:

COUNT ONE

On or about January 6, 2021, within the District of Columbia and elsewhere, defendants, **KEVIN SEEFRIED** and **HUNTER SEEFRIED**, attempted to, and did, corruptly obstruct, influence, and impede an official proceeding, that is, a proceeding before Congress, specifically,

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA Holding a Criminal Term Grand Jury Sworn in on February 14, 2022 UNITED STATES OF AMERICA: CRIMINAL NO. 21-CR-287 (TNM): V.: VIOLATIONS:: 18 U.S.C. §§ 1512(c)(2), 2 KEVIN SEEFRIED, and: (Obstruction of an Official Proceeding) 18 U.S.C. § 1752(a)(1) HUNTER SEEFRIED,: (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): 40 U.S.C. § 5104(e)(2)(G): (Parading, Demonstrating, or Picketing in: a Capitol Building): 18 U.S.C. § 1752(a)(4): (Entering and Remaining in a Restricted: Building or Grounds with Rhystral Unided Cot Agains the roperty). Cla & S. D. & 1361, 2: (Destruction of Government Property): 40 U.S.C. § 5104(e)(2)(F) (Act of Physical Violence in the Capitol Grounds or Building): INDICTMENT The Grand Jury charges that: COUNT ONE On or about January 6, 2021, within the District of Columbia and elsewhere defendants, KEVIN SEEFRIED and HUNTER SEEFRIED AND ADDRESS OF THE SEEFRIED AND ADD and impede an official proceeding that is, is proceeding before congress, specifically, Defendants. Congress's certification of the Electoral College vote as set out in the Twelfth Amendment of the Constitution of the United States and 3 U.S.C. §§ 15-18. (Obstruction of an Official Proceeding and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2) COUNT TWO On or about January 6, 2021, within the District of Columbia, defendants, KEVIN SEEFRIED and HUNTER SEEFRIED, did unlawfully and knowingly enter an Dremain at la vestitute trailiting and growing in that is, Distributed consumation, and entermine restricted area within the United States Capitol and its grounds, where the Vice President was and would be temporarily visiting without lawful authority to do sor (Entering and Remaining in a Restricted Building or Grounds, in in a violation of Title 18, United States Code, Section 1752(a)(1)) COUNT THREE On or about January 6, 2021, within the District of Columbia, defendants, KEVIN SEEFRIED and HUNTER SEEFRIED, did knowingly, and with intententation and description and environmental and a content of the content of disorderly and disruptive conduct in and within such proximity to, a restricted building and grounds, that is, any posted, pordomed-off, and otherwise restricted area within the United States Capitol and its grounds where the be 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. (Disorderly and Disruptive Conduct in ខែការប្រជាពល់ ប្រទេស នៅលើ ទេ ទៅសំណេន នៃ ទៅនៅលោះ ២០ នៅ ខេត្ត (United States Code, Section 1752(a)(2)) 2 COUNT FOUR On or about January 6, 2021, within the District of Columbia, defendants, KEVIN SEEFRIED and HUNTER SEEFRIED willfully and knowingly engaged in disorderly and disruptive conduct in any of the Capitol 8 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, in violation of Title 40, United States Code, Section 5104(e)(2)(D)) COUNT FIVE On or about January 6, 2021, within the District of Columbia, defendants, KEVIN SEEFRIED and HUNTER SEEFRIED, willfully and knowingly paraded, demonstrated, and picketed in any United States Capitol Building. (Parading, Demonstrating, or Picketing in a Capitol Bullding, APVINIAtion Utation of an about IN January 6, 2021, within the District of Columbia, the defendant, HUNTER SEEFRIED, did knowingly engage in snyactof physical violence against any merson and property in a restricted building and grounds that is, any upt 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. (Entering and Remaining in a Restricted Building or tGrounds with physical violence vagains reporting for interesting 18, writed states code; is editor 4,752(a)(n)) COUNT SEVEN On or about January 6, 2021, within the District of Columbia, the defendant, HUNTER 3 AREFIRITED, clid will the injury and committee depredation against property of the United States, and of any department or agency thereof, and any property which has been and is being manufactured and constructed for the United States, and any department or agency thereof, that is a window, causing damage in an amount more of Title 18, United States Code, Section 1361 and 2) COUNT EIGHT On or about January 6, 2021, within the District of Columbia, the defendant HUNTER SEFFRIED, willfully and knowingly engaged in an act of physical violence within the United States Capitol Grounds and any of the Capitol Buildings. (Act of Physical Violence in the Capitol Grounds or Buildings, in violation of Title 40, United States Code, Section 5104(e)(2)(F)) A TRUE BIDLL KORLEPERSON. IMANUAL Bravesstruit Atlaney detithe United States Ground from the District of Cotumbie 11 al

functions.

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

COUNT FOUR

On or about January 6, 2021, within the District of Columbia, defendants, **KEVIN SEEFRIED** and **HUNTER SEEFRIED** 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 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, in violation of Title 40, United States Code, Section 5104(e)(2)(D))

COUNT FIVE

On or about January 6, 2021, within the District of Columbia, defendants, **KEVIN SEEFRIED** and **HUNTER SEEFRIED**, 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)

COUNT SIX

On or about January 6, 2021, within the District of Columbia, the defendant, **HUNTER SEEFRIED**, did knowingly engage in any act of physical violence against any person and property in 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.

(Entering and Remaining in a Restricted Building or Grounds with Physical Violence Against Property, in violation of Title 18, United States Code, Section 1752(a)(4))

COUNT SEVEN

On or about January 6, 2021, within the District of Columbia, the defendant, HUNTER

SEEFRIED, did willfully injure and commit a depredation against property of the United States, and of any department or agency thereof, and any property which has been and is being manufactured and constructed for the United States, and any department or agency thereof, that is a window, causing damage in an amount more than one thousand dollars (\$1,000.00).

(Destruction of Government Property and Aiding and Abetting, in violation of Title 18, United States Code, Section 1361 and 2)

COUNT EIGHT

On or about January 6, 2021, within the District of Columbia, the defendant, **HUNTER SEEFRIED**, willfully and knowingly engaged in an act of physical violence within the United States Capitol Grounds and any of the Capitol Buildings.

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

A TRUE BILL:

FOREPERSON.

Attorney of the United States in and for the District of Columbia.

Matthew Graves prist