

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 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, 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 and remain 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 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 THREE On or about January 6, 2021, within the District of Columbia, defendants, KEVIN SEEFRIED and HUNTER SEEFRIED, 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. (Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of Title 18, 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 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 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 an 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 FOR JEREMY PERKINS, Matthew Graves, a Disrupt Attorney of the United States in and for the District of Columbia, 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 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.