

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on January 8, 2021

UNITED STATES OF AMERICA	:	CRIMINAL NO. 21-CR-341
	:	
v.	:	MAGISTRATE NO. 21-MJ-398
	:	
JOHN DOUGLAS WRIGHT,	:	VIOLATIONS:
	:	18 U.S.C. § 231(a)(3)
Defendant.	:	(Civil Disorder)
	:	18 U.S.C. §§ 1512(c)(2), 2
	:	(Obstruction of an Official Proceeding)
	:	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)
	:	18 U.S.C. § 1752(a)(4)
	:	(Engaging in Physical Violence in a
	:	Restricted Building or Grounds)
	:	40 U.S.C. § 5104(e)(2)(D)
	:	(Disorderly Conduct in the Capitol
	:	Grounds or Buildings)
	:	40 U.S.C. § 5104(e)(2)(F)
	:	(Act of Physical Violence in the Capitol
	:	Grounds or Buildings)
	:	40 U.S.C. § 5104(e)(2)(G)
	:	(Parading, Demonstrating, or Picketing in
	:	a Capitol Building)
	:	18 U.S.C. § 1001
	:	(False Statement to Federal Agent)

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, committed and attempted to commit an act to obstruct, impede, and interfere with a

law enforcement officer lawfully engaged in the lawful performance of his official duties, incident to and during the commission of a civil disorder which in any way and degree obstructed, delayed, and adversely affected commerce and the movement of any article and commodity in commerce and the conduct and performance of any federally protected function.

**(Civil Disorder, in violation of Title 18, United States Code, Section 231(a)(3))**

**COUNT TWO**

On or about January 6, 2021, within the District of Columbia and elsewhere, **JOHN DOUGLAS WRIGHT**, attempted to, and did, corruptly obstruct, influence, and impede an official proceeding, that is, a proceeding before Congress, specifically, 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 THREE**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, did 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 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 FOUR**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, 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 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 FIVE**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, 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 temporarily visiting.

**(Engaging in Physical Violence in a Restricted Building or Grounds, in violation of Title 18, United States Code, Section 1752(a)(4))**

**COUNT SIX**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, willfully and knowingly engaged in disorderly and disruptive conduct in any of the Capitol Buildings and its 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 the Capitol Grounds or Buildings, in violation of Title 40, United States Code, Section 5104(e)(2)(D))**

**COUNT SEVEN**

On or about January 6, 2021, in the District of Columbia, **JOHN DOUGLAS WRIGHT**, 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))

**COUNT EIGHT**

On or about January 6, 2021, within the District of Columbia, **JOHN DOUGLAS WRIGHT**, willfully and knowingly parade, demonstrate, or picket in any of the Capitol Buildings.

**(Parading, Demonstrating, or Picketing in a Capitol Building**, in violation of Title 40, United States Code, Section 5104(e)(2)(G))

**COUNT NINE**

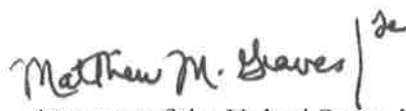
On or about January 11, 2021, within the District of Columbia and elsewhere, **JOHN DOUGLAS WRIGHT**, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by affirmatively stating and representing to agents of the Federal Bureau of Investigation of the Department of Justice that he was not inside the U.S. Capitol

Building on January 6, 2021. The statement and representation was false because, as defendant WRIGHT then and there knew, he had entered the U.S. Capitol Building on January 6, 2021.

(**False Statement to Federal Agent**, in violation of Title 18, United States Code, Section 1001)

A TRUE BILL:

FOREPERSON.

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