

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

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 1:21-cr-258-TFH
v.	:	
	:	
TROY SARGENT,	:	
	:	
Defendant.	:	

BILL OF PARTICULARS

The United States of America, by and through its undersigned counsel, hereby files this Bill of Particulars. This Bill is filed in response to the Court’s minute order of February 7, 2022.

1. In Count One, the defendant is charged with civil disorder, in violation of 18 U.S.C. § 231(a)(3). The Court has ordered the government to set forth the means by which the defendant committed this offense. The defendant committed this offense by grabbing, and then swinging his hand at, an officer with the United States Capitol Police. The government further specifies that the federally protected functions at issue are the U.S. Capitol Police’s enforcement of laws within the United States Capitol Building and its Grounds, pursuant to 2 U.S.C. § 1961, and the U.S. Secret Service’s protection of specified individuals, including the former Vice President and members of his immediate family, pursuant to 18 U.S.C. § 3056. The effect on commerce was twofold. First, the civil disorder resulted in thousands of dollars of damage to media equipment in a media staging area that was on Capitol grounds but not within the restricted area. Second, the civil disorder resulted in the closure of stores at and near Capitol Hill.

2. In Count Two, the defendant is charged with assaulting, resisting, or impeding certain officers, in violation of 18 U.S.C. § 111(a)(1). This Count charges the defendant with physical contact with the victim—the same U.S. Capitol Police officer described above—and the

intent to commit another felony. The Court has ordered the government to identify the felony which the defendant intended to commit. That felony is the civil disorder violation charged in Count One. The government also intends to proceed on a theory that the defendant made physical contact with the Capitol Police officer, and maintains its right, based on the charges returned in the Superseding Indictment, to seek a conviction on either ground.

Respectfully submitted,

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