

**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-332 |
| | : | |
| v. | : | |
| | : | VIOLATIONS: |
| PAUL RUSSELL JOHNSON and | : | 18 U.S.C. § 231(a)(3) |
| STEPHEN CHASE RANDOLPH | : | (Civil Disorder) |
| | : | 18 U.S.C. §§ 1512(c)(2), 2 |
| Defendants. | : | (Obstruction of an Official Proceeding) |
| | : | 18 U.S.C. §§ 111(a)(1) and (b), 2 |
| | : | (Assaulting, Resisting, or Impeding |
| | : | Certain Officers Using a Dangerous |
| | : | Weapon and Inflicting Bodily Injury) |
| | : | 18 U.S.C. § 111(a)(1) (Assaulting, |
| | : | Resisting, or Impeding Certain Officers) |
| | : | 18 U.S.C. §§ 1752(a)(1) and (b)(1)(A) |
| | : | (Entering and Remaining in a Restricted |
| | : | Building or Grounds with a Deadly or |
| | : | Dangerous Weapon) |
| | : | 18 U.S.C. §§ 1752(a)(2) and (b)(1)(A) |
| | : | (Disorderly and Disruptive Conduct in a |
| | : | Restricted Building or Grounds with a |
| | : | Deadly or Dangerous Weapon) |
| | : | 18 U.S.C. §§ 1752(a)(4), (b)(1)(A), |
| | : | (b)(1)(B), 2 |
| | : | (Engaging in Physical Violence in a |
| | : | Restricted Building or Grounds with a |
| | : | Deadly or Dangerous Weapon and |
| | : | Resulting in Significant Bodily Injury) |
| | : | 40 U.S.C. § 5104(e)(2)(D) |
| | : | (Disorderly Conduct in |
| | : | a Capitol Building) |
| | : | 40 U.S.C. §§ 5104(e)(2)(F), 2 |
| | : | (Act of Physical Violence in the Capitol |
| | : | Grounds or Buildings) |

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about January 6, 2021, within the District of Columbia, **PAUL RUSSELL JOHNSON** and **STEPHEN CHASE RANDOLPH**, committed and attempted to commit an act to obstruct, impede, and interfere with a law enforcement officer, that is, Officers from the United States Capitol Police Department, lawfully engaged in the lawful performance of his/her 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, **PAUL RUSSELL JOHNSON** and **STEPHEN CHASE RANDOLPH**, 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, **PAUL RUSSELL JOHNSON** and **STEPHEN CHASE RANDOLPH**, using a deadly or dangerous weapon, that is, a metal crowd control barrier, did forcibly assault, resist, oppose, impede, intimidate, and interfere with, officers and employees of the United States, and of any branch of the United States

Government (including any member of the uniformed services), while such officers or employees were engaged in or on account of the performance of official duties, that is, Officer C.E. and Officer D.C., both officers from the United States Capitol Police, and where the acts in violation of this section involved physical contact with the victims and the intent to commit another felony, and where the acts inflicted bodily injury on Officer C.E.

(Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon, Inflicting Bodily Injury, and Aiding and Abetting, in violation of Title 18, United States Code, Sections 111(a)(1) and (b) and 2)

COUNT FOUR

On or about January 6, 2021, within the District of Columbia, **STEPHEN CHASE RANDOLPH**, did forcibly assault, resist, oppose, impede, intimidate, and interfere with, an officer and employee of the United States, and of any branch of the United States Government (including any member of the uniformed services), while such person was engaged in and on account of the performance of official duties, that is United States Capitol Police Officer D.C., and where the acts in violation of this section involved physical contact with the victim and the intent to commit another felony.

(Assaulting, Resisting, or Impeding Certain Officers, in violation of Title 18, United States Code, Section 111(a)(1))

COUNT FIVE

On or about January 6, 2021, in the District of Columbia, **PAUL RUSSELL JOHNSON** and **STEPHEN CHASE RANDOLPH** 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 temporarily

visiting, without lawful authority to do so and, during and in relation to the offense, did use and carry a deadly and dangerous weapon, that is, a metal crowd control barrier.

(Entering and Remaining in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, in violation of Title 18, United States Code, Sections 1752(a)(1) and (b)(1)(A))

COUNT SIX

On or about January 6, 2021, in the District of Columbia, **PAUL RUSSELL JOHNSON** and **STEPHEN CHASE RANDOLPH** 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 and, during and in relation to the offense, did use and carry a deadly and dangerous weapon, that is, a metal crowd control barrier.

(Disorderly and Disruptive Conduct in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, in violation of Title 18, United States Code, Sections 1752(a)(2) and (b)(1)(A))

COUNT SEVEN

On or about January 6, 2021, in the District of Columbia, **PAUL RUSSELL JOHNSON** and **STEPHEN CHASE RANDOLPH**, 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, and, during and in relation to the offenses, did use and carry a

deadly and dangerous weapon, that is, a metal crowd control barrier, and where the acts in violation of this section resulted in significant bodily injury.

(Engaging in Physical Violence in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, Resulting in Significant Bodily Injury, and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1752(a)(4), (b)(1)(A), (b)(1)(B) and 2)

COUNT EIGHT

On or about January 6, 2021, in the District of Columbia, **PAUL RUSSELL JOHNSON** and **STEPHEN CHASE RANDOLPH** willfully and knowingly engaged in disorderly and disruptive conduct within the United States Capitol Grounds and 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 NINE

On or about January 6, 2021, in the District of Columbia, **PAUL RUSSELL JOHNSON** and **STEPHEN CHASE RANDOLPH**, 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 and Aiding and Abetting, in violation of Title 40, United States Code, Sections 5104(e)(2)(F) and 2)

A TRUE BILL:

FOREPERSON.

Matthew M. Graves | *se*
Attorney of the United States in
and for the District of Columbia.