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**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.
	:	
v.	:	MAGISTRATE NO. 21-MJ-367
	:	MAGISTRATE NO. 21-MJ-382
PAUL RUSSELL JOHNSON, and	:	
STEPHEN CHASE RANDOLPH,	:	VIOLATIONS:
	:	18 U.S.C. § 231(a)(3)
Defendants.	:	(Civil Disorder)
	:	18 U.S.C. §§ 1512(c)(2), 2
	:	(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 law enforcement officers, that is Officers from the United States Capitol Police, lawfully engaged in the lawful performance of their official duties incident to and during the commission of a civil disorder, and the civil disorder obstructed, delayed, and adversely affected the conduct and performance of a 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, by assaulting federal law enforcement officers, committing acts of civil disorder, and engaging in disorderly and disruptive conduct.

(**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, within 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 and Vice President-elect were temporarily visiting, without lawful authority to do so and, during and in