

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

**Holding a Criminal Term**

**Grand Jury Sworn in on January 28, 2021**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b>
	:	
<b>v.</b>	:	<b>MAGISTRATE NO. 21-MJ-499-01-05</b>
	:	
<b>JONATHAN DANIEL POLLOCK, JOSEPH DANIEL HUTCHINSON III, JOSHUA CHRISTOPHER DOOLIN, MICHAEL STEVEN PERKINS, and OLIVIA MICHELE POLLOCK,</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. §§ 111(a)(1) and (b)</b>
	:	<b>(Assaulting, Resisting, or Impeding</b>
	:	<b>Certain Officers Using a Dangerous</b>
	:	<b>Weapon)</b>
<b>Defendants.</b>	:	<b>18 U.S.C. § 111(a)(1)</b>
	:	<b>(Assaulting, Resisting, or Impeding</b>
	:	<b>Certain Officers)</b>
	:	<b>18 U.S.C. § 641</b>
	:	<b>(Theft of Government Property)</b>
	:	<b>18 U.S.C. § 1752(a)(1)</b>
	:	<b>(Entering and Remaining in a Restricted</b>
	:	<b>Building or Grounds)</b>
	:	<b>18 U.S.C. § 1752(a)(2)</b>
	:	<b>(Disorderly and Disruptive Conduct in a</b>
	:	<b>Restricted Building or Grounds)</b>
	:	<b>18 U.S.C. § 1752(a)(4)</b>
	:	<b>(Engaging in Physical Violence in a</b>
	:	<b>Restricted Building or Grounds)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(F)</b>
	:	<b>(Act of Physical Violence in the Capitol</b>
	:	<b>Grounds or Buildings)</b>

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK**, using a deadly and dangerous weapon, that is, a flagpole, 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), and any person assisting such an officer and employee, while such officer or employee was engaged in or on account of the performance of official duties, and where the acts in violation of this section involve physical contact with the victim and the intent to commit another felony.

**(Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon, in violation of Title 18, United States Code, Sections 111(a)(1) and (b))**

**COUNT TWO**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK**, 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), and any person assisting such an officer and employee, that is, A.M. and M.L., both officers from the Metropolitan Police Department, and another police officer, while such person was engaged in and on account of the performance of official duties, and where the acts in violation of this section involve 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, Sections 111(a)(1))**

**COUNT THREE**

On or about January 6, 2021, within the District of Columbia, **JOSEPH DANIEL HUTCHINSON, III**, 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), and any person assisting such an officer and employee, while such person was engaged in and on account of the performance of official duties,

and where the acts in violation of this section involve 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, Sections 111(a)(1))**

**COUNT FOUR**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK**, did embezzle, steal, purloin, knowingly convert to his use and the use of another, and without authority, sold, conveyed and disposed of any record, voucher, money and thing of value of the United States and any department and agency thereof, that is, a United States Capitol Police riot shield, which has a value of less than \$1,000.

**(Theft of Government Property, in violation of Title 18, United States Code, Section 641)**

**COUNT FIVE**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK**, 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), and any person assisting such an officer and employee, while such person was engaged in and on account of the performance of official duties, and where the acts in violation of this section involve 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 SIX**

On or about January 6, 2021, within the District of Columbia, **MICHAEL STEVEN PERKINS**, using a deadly and dangerous weapon, that is, a flagpole, 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), and any person assisting such an officer and employee, that is, A.P. an officer from the Metropolitan Police Department, and another police officer, while such officer or employee was engaged in or on account of the performance of official duties, and where the acts in violation of this section involve physical contact with the victim and the intent to commit another felony.

**(Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon, in violation of Title 18, United States Code, Sections 111(a)(1) and (b))**

**COUNT SEVEN**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK** 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), and any person assisting such an officer and employee, that is, B.R., an officer from the Metropolitan Police Department, while such person was engaged in and on account of the performance of official duties, and where the acts in violation of this section involve 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 EIGHT**

On or about January 6, 2021, within the District of Columbia, **JOSEPH DANIEL HUTCHINSON**, 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), and any person assisting such an officer and employee, while such person was engaged in and on account of the performance of official duties, and where the acts in violation of this section involve 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 NINE**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK**, did embezzle, steal, purloin, knowingly convert to his use and the use of another, and without authority, sold, conveyed and disposed of any record, voucher, money and thing of value of the United States and any department and agency thereof, that is, a United States Capitol Police riot shield, which has a value of less than \$1,000.

**(Theft of Government Property, in violation of Title 18, United States Code, Section 641)**

**COUNT TEN**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK**, using a deadly and dangerous weapon, that is, a riot shield, 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), and any person assisting such an officer and employee, that is, J.G. an officer from the Metropolitan Police Department, and another police officer, while such officer or employee was engaged in or on account of the performance of official duties, and where the acts in violation of this section involve physical contact with the victim and the intent to commit another felony.

**(Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon, in violation of Title 18, United States Code, Sections 111(a)(1) and (b))**

**COUNT ELEVEN**

On or about January 6, 2021, within the District of Columbia, **JOSEPH DANIEL HUTCHINSON, III**, 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), and any person assisting such an officer and employee, that is, two officers from the Metropolitan Police Department, while such person was engaged in and on account of the performance of official duties, and where the acts in violation of this section involve 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 TWELVE**

On or about January 6, 2021, within the District of Columbia, **OLIVIA MICHELE POLLOCK**, 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), and any person assisting such an officer and employee, that is, S.S, an officer with the Metropolitan Police Department, while such person was engaged in and on account of the performance of official duties, and where the acts in violation of this section involve 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 THIRTEEN**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK**, 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), and any person assisting such an officer and employee,

that is, A.S., an officer with the Metropolitan Police Department, while such person was engaged in and on account of the performance of official duties, and where the acts in violation of this section involve 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 FOURTEEN**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK** did embezzle, steal, purloin, knowingly convert to his use and the use of another, and without authority, sold, conveyed and disposed of any record, voucher, money and thing of value of the United States and any department and agency thereof, that is, two United States Capitol Police riot shields, which have a value of less than \$1,000.

**(Theft of Government Property, in violation of Title 18, United States Code, Section 641)**

**COUNT FIFTEEN**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK**, 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), and any person assisting such an officer and employee, while such person was engaged in and on account of the performance of official duties, and where the acts in violation of this section involve 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 SIXTEEN**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK, JOSEPH DANIEL HUTCHINSON, III, JOSHUA CHRISTOPHER DOOLIN, MICHAEL STEVEN PERKINS, and OLIVIA MICHELE POLLOCK** 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 and Vice President-elect were 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 SEVENTEEN**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK, JOSEPH DANIEL HUTCHINSON, III, JOSHUA CHRISTOPHER DOOLIN, MICHAEL STEVEN PERKINS, and OLIVIA MICHELE POLLOCK**, 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 and Vice President-elect were 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 EIGHTEEN**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK, JOSEPH DANIEL HUTCHINSON, III, MICHAEL STEVEN PERKINS, and**



**OLIVIA MICHELE POLLOCK**, 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 and Vice President-elect were 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 NINETEEN**

On or about January 6, 2021, within the District of Columbia, **JONATHAN DANIEL POLLOCK, JOSEPH DANIEL HUTCHINSON, III, MICHAEL STEVEN PERKINS**, and **OLIVIA MICHELE POLLOCK**, 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.