

**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-157 |
| | : | |
| v. | : | |
| | : | VIOLATIONS: |
| CHRISTIAN SECOR, | : | 18 U.S.C. §§ 1512(c)(2), 2 |
| | : | (Obstruction of an Official Proceeding) |
| Defendant. | : | 18 U.S.C. §§ 231(a)(3), 2 |
| | : | (Civil Disorder) |
| | : | 18 U.S.C. §§ 111(a)(1), 2 |
| | : | (Assaulting, Resisting, or Impeding |
| | : | Certain Officers) |
| | : | 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) |
| | : | 40 U.S.C. § 5104(e)(2)(A) |
| | : | (Entering and Remaining on the Floor of |
| | : | Congress) |
| | : | 40 U.S.C. § 5104(e)(2)(B) |
| | : | (Entering and Remaining in the Gallery of |
| | : | Congress) |
| | : | 40 U.S.C. § 5104(e)(2)(C) |
| | : | (Entering and Remaining in Certain |
| | : | Rooms in the Capitol Building) |
| | : | 40 U.S.C. § 5104(e)(2)(D) |
| | : | (Disorderly Conduct in |
| | : | a Capitol Building) |
| | : | 40 U.S.C. § 5104(e)(2)(G) |
| | : | (Parading, Demonstrating, or Picketing in |
| | : | a Capitol Building) |
| | : | |
| | : | |

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about January 6, 2021, within the District of Columbia and elsewhere, **CHRISTIAN SECOR**, 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, and aided and abetted others known and unknown to do the same.

(Obstruction of an Official Proceeding and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2)

COUNT TWO

On or about January 6, 2021, within the District of Columbia, **CHRISTIAN SECOR**, 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, and aided and abetted others known and unknown to do the same.

(Civil Disorder and Aiding and Abetting, in violation of Title 18, United States Code, Section 231(a)(3), and 2)

COUNT THREE

On or about January 6, 2021, within the District of Columbia, **CHRISTIAN SECOR**, 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, officers from the Capitol Police Department, while such persons were 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 and Aiding and Abetting, in violation of Title 18, United States Code, Section 111(a)(1), Section 2)

COUNT FOUR

On or about January 6, 2021, in the District of Columbia, **CHRISTIAN SECOR**, 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.

(Entering and Remaining in a Restricted Building or Grounds, in violation of Title 18, United States Code, Section 1752(a)(1))

COUNT FIVE

On or about January 6, 2021, in the District of Columbia, **CHRISTIAN SECOR**, 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 SIX

On or about January 6, 2021, in the District of Columbia, **CHRISTIAN SECOR**, willfully and knowingly entered and remained on the floor of a House of Congress and in any cloakroom and lobby adjacent to that floor, in the Rayburn Room of the House of Representatives, and in the

Marble Room of the Senate, without authorization to do so.

(Entering and Remaining on the Floor of Congress, in violation of Title 40, United States Code, Section 5104(e)(2)(A))

COUNT SEVEN

On or about January 6, 2021, in the District of Columbia, **CHRISTIAN SECOR**, willfully and knowingly entered and remained in the gallery of either House of Congress, without authorization to do so.

(Entering and Remaining in the Gallery of Congress, in violation of Title 40, United States Code, Section 5104(e)(2)(B))

COUNT EIGHT

On or about January 6, 2021, in the District of Columbia, **CHRISTIAN SECOR**, willfully and knowingly, and with the intent to disrupt the orderly conduct of official business, entered and remained in a room in any of the Capitol Buildings set aside and designated for the use of either House of Congress and a Member, committee, officer, and employee of Congress, and either House of Congress, and the Library of Congress, without authorization to do so.

(Entering and Remaining in Certain Rooms in the Capitol Building, in violation of Title 40, United States Code, Section 5104(e)(2)(C))

COUNT NINE

On or about January 6, 2021, in the District of Columbia, **CHRISTIAN SECOR**, willfully and knowingly engaged in disorderly and disruptive conduct 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 and 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 TEN

On or about January 6, 2021, in the District of Columbia, **CHRISTIAN SECOR**, willfully and knowingly paraded, demonstrated, and picketed in any United States Capitol Building.

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

A TRUE BILL:

FOREPERSON.

Matthew M. Hayes |^{2c}

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