

**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

v.

**JULIAN ELIE KHATER
and
GEORGE PIERRE TANIOS,**

Defendants.

: CRIMINAL NO.
:
: MAGISTRATE NO. 21-MJ-286
:
: VIOLATIONS:
: 18 U.S.C. § 372
: (Conspiracy to Impede or Injure an
: Officer)
: 18 U.S.C. §§ 111(a)(1), (b), and 2
: (Assault on a Federal Officer with a
: Dangerous Weapon and Aiding and
: Abetting)
: 18 U.S.C. § 231(a)(3)
: (Civil Disorder)
: 18 U.S.C. §§ 1512(c)(2)
: (Obstruction of an Official Proceeding)
: 18 U.S.C. § 1752(a)(1), (b)(1)(A), (b)(1)(B)
: (Entering and Remaining in a Restricted
: Building or Grounds with a Deadly or
: Dangerous Weapon and Causing
: Significant Bodily Injury)
: 18 U.S.C. §§ 1752(a)(2), (b)(1)(A), (b)(1)(B)
: (Disorderly and Disruptive Conduct in a
: Restricted Building or Grounds with a
: Deadly or Dangerous Weapon and
: Causing Significant Bodily Injury)
: 18 U.S.C. § 1752(a)(4), (b)(1)(A), (b)(1)(B)
: (Engaging in Physical Violence in a
: Restricted Building or Grounds with a
: Deadly or Dangerous Weapon and
: Causing Significant Bodily Injury)
: 40 U.S.C. § 5104(e)(2)(F)
: (Act of Physical Violence in the Capitol
: Grounds or Buildings)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Commencing on or about January, 6, 2021 in the District of Columbia and elsewhere, the defendants **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, knowingly and willfully did conspire and agree together and with each other to injure U.S. Capitol Police Officer B. Sicknick, U.S. Capitol Police Officer C. Edwards, Metropolitan Police Officer D. Chapman, and other officers, while those officers were engaged in, or on account of, the lawful discharge of the duties of their office or in order to interrupt, hinder, and impede them in the discharge of their official duties, in violation of Title 18, United States Code, Section 372.

Among the means by which the defendants and co-conspirators carried out the object of the conspiracy were: defendants **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS** armed themselves with a chemical spray and utilized a chemical spray against members of the United States Capitol Police and members of the Metropolitan Police Department who were assisting the United States Capitol Police.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendants performed the following overt acts:

1. On or about January, 6, 2021, in the District of Columbia, defendants **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS** joined other individuals at the United States Capitol, which was closed to the public and guarded by members of the United States Capitol Police and members of the Metropolitan Police Department who were assisting the United States Capitol Police.

2. On or about January, 6, 2021, in the District of Columbia, defendants **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, jointly and in concert, moved close to the police line that was guarding the perimeter of the Lower West Terrace of the U.S. Capitol Building.

3. On or about January, 6, 2021, in the District of Columbia, defendant **GEORGE PIERRE TANIOS** carried a canister of chemical spray within a backpack that he was wearing.

4. On or about January, 6, 2021, in the District of Columbia, defendant **JULIAN ELIE KHATER** asked defendant **GEORGE PIERRE TANIOS** for the chemical spray and defendant **JULIAN ELIE KHATER** then retrieved a chemical spray from the backpack that defendant **GEORGE PIERRE TANIOS** was wearing.

5. On or about January, 6, 2021, in the District of Columbia, defendants **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS** planned and discussed the timing of when to utilize the chemical spray against law enforcement.

6. On or about January, 6, 2021, in the District of Columbia, defendant **JULIAN ELIE KHATER** deployed a chemical spray directly at law enforcement officers in the police line guarding the Lower West Terrace of the U.S. Capitol Building.

7. On or about January, 6, 2021, in the District of Columbia, defendant **JULIAN ELIE KHATER** utilized a chemical spray against United States Capitol Police Officer B. Sicknick, United States Capitol Police Officer C. Edwards, Metropolitan Police Officer D. Chapman, and other law enforcement officers.

(Conspiracy to Impede or Injure an Officer, in violation of Title 18, United States Code, Section 372)

COUNT TWO

On or about January 6, 2021, within the District of Columbia, **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, using a deadly or dangerous weapon, that is, a chemical spray,

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), that is, Officer B. Sicknick, an officer of the United States Capitol Police Department, while such officer or employee was engaged in or on account of the performance of official duties, and where the acts involved physical contact with the victim and the intent to commit another felony.

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

COUNT THREE

On or about January 6, 2021, within the District of Columbia, **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, using a deadly or dangerous weapon, that is, a chemical spray, 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), that is, Officer C. Edwards, an officer of the United States Capitol Police Department, while such officer or employee was engaged in or on account of the performance of official duties, and where the acts involved physical contact with the victim and the intent to commit another felony.

(Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon 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, **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, using a deadly or dangerous weapon, that is, a chemical spray, 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), that is, Officer D. Chapman, an officer of the Metropolitan Police Department, who was assisting the United States Capitol Police, while such officer or employee was engaged in or on account of the performance of official duties, and where the acts involved physical contact with the victim and the intent to commit another felony.

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

COUNT FIVE

On or about January 6, 2021, within the District of Columbia, **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, committed and attempted to commit an act to obstruct, impede, and interfere with law enforcement officers, that is, Officers B. Sicknick and C. Edwards, officers of the United States Capitol Police Department, and Officer D. Chapman, an officer of the Metropolitan Police Department for the District of Columbia, lawfully engaged in the 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 SIX

On or about January 6, 2021, within the District of Columbia and elsewhere, **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, attempted to, and did, corruptly obstruct, influence, and impede an official proceeding, that is, a proceeding before Congress, by committing an act of civil disorder, and engaging in disorderly and disruptive conduct.

(Obstructing or Impeding Any Official Proceeding, in violation of Title 18, United States Code, Sections 1512(c)(2))

COUNT SEVEN

On or about January 6, 2021, within the District of Columbia, **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, 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 relation to the offense, did use and carry a deadly and dangerous weapon, that is, a chemical spray, and did cause significant bodily injury.

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

COUNT EIGHT

On or about January 6, 2021, in the District of Columbia, **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, 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 and, during and in relation to the offense, did use and carry a deadly and dangerous weapon, that is, a chemical spray, and did cause significant bodily injury.

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

COUNT NINE

On or about January 6, 2021, in the District of Columbia, **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, 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 and, during and in relation to the offense, did use and carry a deadly and dangerous weapon, that is, a chemical spray, and did cause significant bodily injury.

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

COUNT TEN

On or about January 6, 2021, in the District of Columbia, **JULIAN ELIE KHATER** and **GEORGE PIERRE TANIOS**, 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.

Channing D. Phillips / [Signature]
Attorney of the United States in
and for the District of Columbia.