

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

**Holding a Criminal Term**

**Grand Jury Sworn in on January 8, 2021**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 21-CR-291</b>
	:	
<b>v.</b>	:	<b>MAGISTRATE NO. 21-MJ-297</b>
	:	
<b>THOMAS F. SIBICK,</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. §§ 1512(c)(2), 2</b>
<b>Defendant.</b>	:	<b>(Obstruction of an Official Proceeding)</b>
	:	<b>18 U.S.C. § 231(a)(3)</b>
<b>ALBUQUERQUE COSPER HEAD,</b>	:	<b>(Civil Disorder)</b>
	:	<b>18 U.S.C. § 111(a)(1)</b>
<b>Defendant.</b>	:	<b>(Assaulting, Resisting, or Impeding</b>
	:	<b>Certain Officers)</b>
<b>KYLE J. YOUNG,</b>	:	<b>18 U.S.C. § 2111</b>
	:	<b>(Robbery)</b>
<b>Defendant.</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)(3)</b>
	:	<b>(Impeding Ingress and Egress 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)(E)</b>
	:	<b>(Impeding Passage Through the Capitol</b>
	:	<b>Grounds or Buildings)</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 and elsewhere, **THOMAS F. SIBICK, ALBUQUERQUE COSPER HEAD, and KYLE J. YOUNG** 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 TWO**

On or about January 6, 2021, within the District of Columbia, **ALBUQUERQUE COSPER HEAD and KYLE J. YOUNG** committed and attempted to commit an act to obstruct, impede, and interfere with a law enforcement officer 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 THREE**

On or about January 6, 2021, within the District of Columbia, **THOMAS F. SIBICK, ALBUQUERQUE COSPER HEAD, and KYLE J. YOUNG** committed and attempted to commit an act to obstruct, impede, and interfere with a law enforcement officer, that is, Officer M.F., an officer from the Metropolitan 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 FOUR**

On or about January 6, 2021, within the District of Columbia, **THOMAS F. SIBICK, ALBUQUERQUE COSPER HEAD, and KYLE J. YOUNG** 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, Officer M.F. 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 FIVE**

On or about January 6, 2021, within the District of Columbia, **KYLE J. YOUNG** 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, Officer M.M. an officer from the United States Capitol Police 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 special maritime and territorial jurisdiction of the United States, **THOMAS F. SIBICK**, did by force and violence, and by intimidation, take and attempt to take from the person or presence of another, that is, Officer M.F., a thing of value, that is, a police radio and a police badge.

**(Robbery, in violation of Title 18, United States Code, Section 2111)**

**COUNT SEVEN**

On or about January 6, 2021, within the special maritime and territorial jurisdiction of the United States, **KYLE YOUNG**, did by force and violence, and by intimidation, take and attempt to take from the person or presence of another, that is, Officer M.F., a thing of value, that is, Metropolitan Police Department issued service weapon.

**(Robbery, in violation of Title 18, United States Code, Section 2111)**

**COUNT EIGHT**

On or about January 6, 2021, in the District of Columbia, **THOMAS F. SIBICK**, **ALBUQUERQUE COSPER HEAD**, and **KYLE J. YOUNG** 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 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 NINE**

On or about January 6, 2021, in the District of Columbia, **THOMAS F. SIBICK**, **ALBUQUERQUE COSPER HEAD**, and **KYLE J. YOUNG** 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 TEN**

On or about January 6, 2021, in the District of Columbia, **THOMAS F. SIBICK, ALBUQUERQUE COSPER HEAD, and KYLE J. YOUNG** did knowingly, and with intent to impede and disrupt the orderly conduct of Government business and official functions, obstructed and impeded ingress and egress to and from 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.

**(Impeding Ingress and Egress in a Restricted Building or Grounds, in violation of Title 18, United States Code, Section 1752(a)(3))**

**COUNT ELEVEN**

On or about January 6, 2021, within the District of Columbia, **THOMAS F. SIBICK, ALBUQUERQUE COSPER HEAD, and KYLE J. YOUNG** 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.

**(Engaging in Physical Violence in a Restricted Building or Grounds, in violation of Title 18, United States Code, Section 1752(a)(4))**

**COUNT TWELVE**

On or about January 6, 2021, within the District of Columbia, **THOMAS F. SIBICK, ALBUQUERQUE COSPER HEAD, and KYLE J. YOUNG** willfully and knowingly obstructed, and impeded passage through and within, the United States Capitol Grounds and any of the Capitol Buildings.

**(Impeding Passage Through the Capitol Grounds or Buildings, in violation of Title 40, United States Code, Section 5104(e)(2)(E))**

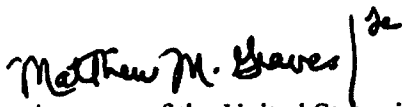
**COUNT THIRTEEN**

On or about January 6, 2021, in the District of Columbia, **THOMAS F. SIBICK, ALBUQUERQUE COSPER HEAD, and KYLE J. YOUNG** 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.