# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

# **Holding a Criminal Term**

Grand Jury Sworn in on September 15, 2023

:

UNITED STATES OF AMERICA : CRIMINAL NO. 23-CR-269-TJK

: VIOLATIONS:

: 18 U.S.C. §§ 1512(c)(2), 2

JOSHUA KALEB YOUNGERMAN, : (Obstruction of an Official Proceeding and

Aiding and Abetting)

Defendant. : 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)(D)

: (Disorderly Conduct in a Capitol Building)

: 40 U.S.C. § 5104(e)(2)(G)

: (Parading, Demonstrating, or Picketing in

a Capitol Building)40 U.S.C. § 5104(d)

: (Stepping, Climbing, Removing, or

: Injuring Property on the Capitol Grounds)

## **INDICTMENT**

The Grand Jury charges that:

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#### **COUNT ONE**

On or about January 6, 2021, within the District of Columbia and elsewhere, **JOSHUA KALEB YOUNGERMAN** 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, in the District of Columbia, **JOSHUA KALEB YOUNGERMAN** 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 and would be 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 THREE**

On or about January 6, 2021, in the District of Columbia, **JOSHUA KALEB YOUNGERMAN** 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 and would be 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 FOUR**

On or about January 6, 2021, in the District of Columbia, **JOSHUA KALEB YOUNGERMAN** willfully and knowingly engaged in disorderly and disruptive conduct within the United States Capitol Grounds and 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 or any deliberation of, a committee of Congress or either House of Congress.

(Disorderly Conduct in a Capitol Building or Grounds, in violation of Title 40, United

in a Capitol Building or Grounds, in violation of Title 40, Officed (5104(e)(2)(D))

States Code, Section 5104(e)(2)(D))

**COUNT FIVE** 

On or about January 6, 2021, in the District of Columbia, JOSHUA KALEB YOUNGERMAN 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))

**COUNT SIX** 

On or about January 6, 2021, in the District of Columbia, **JOSHUA KALEB YOUNGERMAN** stepped on, climbed on, removed, and in any way injured a statue, seat, wall, fountain, and other erection and architectural feature, and any tree, shrub, plant, and turf, in the

United States Capitol Grounds.

(Stepping, Climbing. Removing, or Injuring Property on Capitol Grounds, in

violation of Title 40, United States Code, Section 5104(d))

A TRUE BILL:

FOREPERSON.

Attorney of the United States in

and for the District of Columbia.

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