

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CASE NO.:</b>
	:	
<b>v.</b>	:	<b>MAGISTRATE NO.: 23-mj-260 (RMM)</b>
	:	
<b>CHARLES R. WALTERS,</b>	:	<b>VIOLATIONS:</b>
	:	
<b>Defendant.</b>	:	<b>18 U.S.C. § 1752(a)(1)</b>
	:	<b>(Entering or Remaining in</b>
	:	<b>any Restricted 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>40 U.S.C. § 5104(e)(2)(D)</b>
	:	<b>(Disorderly Conduct in a Capitol</b>
	:	<b>Building or Grounds)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(G)</b>
	:	<b>(Parading, Demonstrating, or Picketing in</b>
	:	<b>a Capitol Building)</b>
	:	<b>18 U.S.C. §§ 1361, 2</b>
	:	<b>(Destruction of Government Property)</b>

**INFORMATION**

The United States Attorney charges that:

**COUNT ONE**

On or about January 6, 2021, within the District of Columbia, **CHARLES R. WALTERS**, 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 or Remaining in any Restricted Building or Grounds**, in violation of Title 18, United States Code, Section 1752(a)(1))

**COUNT TWO**

On or about January 6, 2021, within the District of Columbia, **CHARLES R. WALTERS**, 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 THREE**

On or about January 6, 2021, within the District of Columbia, **CHARLES R. WALTERS**, 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 States Code, Section 5104(e)(2)(D))**

**COUNT FOUR**

On or about January 6, 2021, within the District of Columbia, **CHARLES R. WALTERS**, willfully and knowingly obstructed, 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 FIVE**

On or about January 6, 2021, within the District of Columbia, **CHARLES R. WALTERS**, attempted to and did willfully injure and commit depredation against property of the United States, and of any department and agency thereof, and any property which has been and is being manufactured and constructed for the United States, and any department or agency thereof, that is, fencing installed for the Presidential Inauguration ceremony, causing damage in an amount more than \$1000.

**(Destruction of Government Property and Aiding and Abetting**, in violation of Title 18, United States Code, Sections 1361 and 2)

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar No. 481052

By: /s/ Cari F. Walsh  
CARI F. WALSH  
Assistant United States Attorney  
MO Bar No. 37867  
U.S. Attorney's Office for the District of Columbia  
601 D Street N.W.  
Washington, DC 20530  
Phone: (816) 426-4307  
Email: Cari.Walsh@usdoj.gov