

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Criminal Case No.
	:	
v.	:	Magistrate Case No. 1:24-mj-177
	:	
RANDY VERDUN SR.,	:	VIOLATIONS:
	:	
	:	40 U.S.C. § 5104(e)(2)(D)
	:	(Disorderly Conduct in a Capitol
Defendant.	:	Building)
	:	40 U.S.C. § 5104(e)(2)(G)
	:	(Parading, Demonstrating, or Picketing
	:	in a Capitol Building)

INFORMATION

The United States Attorney charges that at all relevant times:

COUNT ONE

On or about January 6, 2021, in the District of Columbia, **RANDY VERDUN SR.** 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, in violation of Title 40, United States Code, Section 5104(e)(2)(D))

COUNT TWO

On or about January 6, 2021, in the District of Columbia, **RANDY VERDUN SR.** 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))

Respectfully submitted,

Matthew M. Graves
United States Attorney
D.C. Bar No. 481052

By: /s/ Eli J. Ross
Eli J. Ross
Assistant United States Attorney
Illinois Bar Number 6321411
United States Attorney's Office
601 D Street, N.W.
Washington, D.C. 20530
Telephone: 202-297-1515
Email: Eli.Ross@usdoj.gov