

**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-091 (RCL)</b>
	:	
<b>v.</b>	:	
	:	<b>VIOLATIONS:</b>
<b>CRAIG MICHAEL BINGERT,</b>	:	<b>18 U.S.C. § 1512(c)(2), 2</b>
<b>ISAAC STEVE STURGEON, and</b>	:	<b>(Obstruction of an Official Proceeding)</b>
<b>TAYLOR JAMES JOHNATAKIS,</b>	:	<b>18 U.S.C. § 111(a)(1)</b>
	:	<b>(Assaulting, Resisting, or Impeding</b>
<b>Defendants.</b>	:	<b>Certain Officers)</b>
	:	<b>18 U.S.C. § 231(a)(3)</b>
	:	<b>(Civil Disorder)</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)(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, **CRAIG MICHAEL BINGERT, ISAAC STEVE STURGEON, and TAYLOR JAMES JOHNATAKIS**, 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, **CRAIG MICHAEL BINGERT, ISAAC STEVE STURGEON, and TAYLOR JAMES JOHNATAKIS**, 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, 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 THREE**

On or about January 6, 2021, within the District of Columbia, **CRAIG MICHAEL BINGERT, ISAAC STEVE STURGEON, and TAYLOR JAMES JOHNATAKIS**, 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 FOUR**

On or about January 6, 2021, within the District of Columbia, **CRAIG MICHAEL BINGERT, ISAAC STEVE STURGEON, and TAYLOR JAMES JOHNATAKIS**, did unlawfully and knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off, or 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 FIVE**

On or about January 6, 2021, within the District of Columbia, **CRAIG MICHAEL BINGERT, ISAAC STEVE STURGEON, and TAYLOR JAMES JOHNATAKIS**, 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, or 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 SIX**

On or about January 6, 2021, within the District of Columbia, **CRAIG MICHAEL BINGERT, ISAAC STEVE STURGEON, and TAYLOR JAMES JOHNATAKIS**, 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, or 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 SEVEN**

On or about January 6, 2021, within the District of Columbia, **CRAIG MICHAEL BINGERT, ISAAC STEVE STURGEON, and TAYLOR JAMES JOHNATAKIS**, willfully and knowingly obstructed, and impeded passage through and within, the United States Capitol Grounds and any of the Capitol Buildings.

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

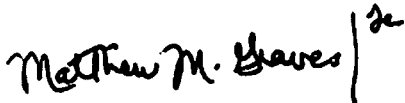
**COUNT EIGHT**

On or about January 6, 2021, within the District of Columbia, **CRAIG MICHAEL BINGERT, ISAAC STEVE STURGEON, and TAYLOR JAMES JOHNATAKIS**, willfully and knowingly engaged in an act of physical violence within the United States Capitol Grounds and any of the Capitol Buildings.

**(Engaging in an Act of Physical Violence in the Grounds or Any of the Capitol Buildings, in violation of Title 40, United States Code, Section 5104(e)(2)(F))**

A TRUE BILL:

FOREPERSON.

The block contains a handwritten signature in black ink that reads "Matthew M. Graves". To the right of the signature is a small, stylized mark that appears to be a checkmark or the number "2".

Attorney of the United States in  
and for the District of Columbia.