

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

Holding a Criminal Term

Grand Jury Sworn in on February 14, 2022

UNITED STATES OF AMERICA

**v.
STEVEN MILES, and
MATTHEW LEBRUN**

Defendants.

: CRIMINAL NO.

**:
: MAGISTRATE NO. 22-mj-78**

: VIOLATIONS:

: 18 U.S.C. § 231(a)(3)

: (Civil Disorder)

: 18 U.S.C. § 111(a)(1)

: (Assaulting, Resisting, or Impeding

: Certain Officers)

: 18 U.S.C. § 1361

: (Destruction of Government Property)

: 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)

: 18 U.S.C. § 1752(a)(4) and (b)(1)(A)

: (Physical Violence in a Restricted Building

: or Grounds with a Deadly or Dangerous

: Weapon)

: 40 U.S.C. § 5104(e)(2)(D)

: (Disorderly Conduct in

: a Capitol Building)

: 40 U.S.C. § 5104(e)(2)(F)

: (Act of Physical Violence in the Capitol

: Grounds or Buildings)

: 40 U.S.C. § 5104(e)(2)(G)

: (Parading, Demonstrating, or Picketing in

: a Capitol Building)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about January 6, 2021, within the District of Columbia, **STEVEN MILES**, committed and attempted to commit an act to obstruct, impede, and interfere with law enforcement officers, lawfully engaged in the lawful performance of their 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 TWO

On or about January 6, 2021, within the District of Columbia, **STEVEN MILES**, 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, including but not limited to 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 THREE

On or about January 6, 2021, within the District of Columbia, **STEVEN MILES**, 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 a window adjacent to the Senate Wing Door, causing damage in an amount more than \$1000.

(Destruction of Government Property, in violation of Title 18, United States Code, Section 1361)

COUNT FOUR

On or about January 6, 2021, in the District of Columbia, **STEVEN MILES** and **MATTHEW LEBUN**, 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 FIVE

On or about January 6, 2021, in the District of Columbia, **STEVEN MILES** and **MATTHEW LEBRUN**, 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 SIX

On or about January 6, 2021, in the District of Columbia, **STEVEN MILES**, 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 and would be temporarily visiting, and, during and in relation to the offense, did use and carry a deadly and dangerous weapon, that is, a plank of wood.

(Physical Violence in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, in violation of Title 18, United States Code, Section 1752(a)(4) and (b)(1)(A))

COUNT SEVEN

On or about January 6, 2021, in the District of Columbia, **MATTHEW LEBRUN** and **STEVEN MILES**, 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 EIGHT

On or about January 6, 2021, in the District of Columbia, **STEVEN MILES**, 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))

COUNT NINE

On or about January 6, 2021, in the District of Columbia, **MATTHEW LEBRUN** and **STEVEN MILES**, 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))

A TRUE BILL:

FOREPERSON.

A handwritten signature in black ink that reads "Matthew Graves" followed by a stylized monogram or initials.

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