# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

# Holding a Criminal Term

Grand Jury Sworn in on August 11, 2021

:

:

UNITED STATES OF AMERICA

CRIMINAL NO. 21-CR-286 BAH

v.

MAGISTRATE NO. 21-MJ-343 376 1 1/17/21

GRADY DOUGLAS OWENS and JASON DOUGLAS OWENS,

Defendants.

: 18 U.S.C. § 231(a)(3)

VIOLATIONS:

: (Civil Disorder)

: 18 U.S.C. §§§ 111(a)(1) and (b), 2

: (Assaulting, Resisting, or Impeding: Certain Officers Using a Dangerous: Weapon, Inflicting Bodily Injury)

: 18 U.S.C. § 111(a)(1)

: (Assaulting, Resisting, or Impeding

: Certain Officers)

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

: and (B)

(Entering and Remaining in a RestrictedBuilding or Grounds, Using and Carrying a

: Dangerous Weapon, Resulting in

: Significant Bodily Injury)

: 18 U.S.C. § 1752(a)(1)

: (Entering and Remaining in a Restricted

: Building or Grounds)

: 18 U.S.C. §§§ 1752(a)(2) and (b)(1)(A)

: and (B)

(Disorderly and Disruptive Conduct in a
Restricted Building or Grounds, Using and
Carrying a Dangerous Weapon, Resulting

: in Significant Bodily Injury)

: 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)

and (B)

: (Engaging in Physical Violence in a

Restricted Building or Grounds, Using and Carrying a Dangerous Weapon, Resulting

: in Significant Bodily Injury)

: 18 U.S.C. § 1752(a)(4)

: (Engaging in Physical Violence 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)(F)

: (Act of Physical Violence in the Capitol

Grounds or Buildings)

# INDICTMENT

The Grand Jury charges that:

# **COUNT ONE**

On or about January 6, 2021, within the District of Columbia, GRADY DOUGLAS OWENS, committed and attempted to commit an act to obstruct, impede, and interfere with a law enforcement officer, that is, Officer C.B., an officer from the Metropolitan Police Department, lawfully engaged in the lawful performance of his 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, GRADY DOUGLAS OWENS, using a deadly or dangerous weapon, that is, a skateboard, did forcibly assault, resist, oppose, impede, intimidate, and interfere with, and inflict bodily injury on, 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, that is, C.B., an officer from the Metropolitan Police Department, while such officer or employee was

engaged in or 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 Using a Dangerous Weapon, Inflicting Bodily Injury and Aiding and Abetting, in violation of Title 18, United States Code, Sections 111(a)(1) and (b) and 2)

## **COUNT THREE**

On or about January 6, 2021, within the District of Columbia, JASON DOUGLAS OWENS, committed and attempted to commit an act to obstruct, impede, and interfere with a law enforcement officer, that is, Officer N.D., an officer from the Metropolitan Police Department, lawfully engaged in the lawful performance of his 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, JASON DOUGLAS OWENS, 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, that is, N.D., an officer from the Metropolitan Police Department, while such officer or employee was engaged in or 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, Sections 111(a)(1))

#### **COUNT FIVE**

On or about January 6, 2021, within the District of Columbia, JASON DOUGLAS OWENS, committed and attempted to commit an act to obstruct, impede, and interfere with a law enforcement officer, that is, Officer M.B., an officer from the United States Capitol, lawfully engaged in the lawful performance of his 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 SIX**

On or about January 6, 2021, within the District of Columbia, JASON DOUGLAS OWENS, 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, that is, M.B., an officer from the United States Capitol, while such officer or employee was engaged in or 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, Sections 111(a)(1))

#### **COUNT SEVEN**

On or about January 6, 2021, within the District of Columbia, GRADY DOUGLAS OWENS, did knowingly enter and remain in restricted grounds, that is, any posted, cordoned-off, and otherwise restricted area within the United States Capitol and its grounds, where the Vice President was temporarily visiting, without lawful authority to do so, and, during and in relation

to the offense, did use and carry a deadly and dangerous weapon, that is, a skateboard, and the offense resulted in significant bodily injury.

(Entering and Remaining in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, Resulting in Significant Bodily Injury, in violation of Title 18, United States Code, Section 1752(a)(1) and (b)(1)(A) and (B))

## **COUNT EIGHT**

On or about January 6, 2021, within the District of Columbia, JASON DOUGLAS OWENS, did knowingly enter and remain in restricted grounds, that is, any posted, cordoned-off, and 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 NINE**

On or about January 6, 2021, within the District of Columbia, GRADY DOUGLAS OWENS, 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 temporarily visiting, when and so that such conduct did in fact impede and disrupt the orderly conduct of Government business and official functions, and during and in relation to the offense, did use and carry a dangerous weapon, that is, a skateboard, and the offense resulted in significant bodily injury.

(Disorderly and Disruptive Conduct in a Restricted Building or Grounds, Using and Carrying a Dangerous Weapon, Resulting in Significant Bodily Injury, in violation of Title 18, United States Code, Sections 1752(a)(2) and (b)(1)(A) and (B))

### **COUNT TEN**

On or about January 6, 2021, within the District of Columbia, JASON DOUGLAS OWENS, 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 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, Sections 1752(a)(2))

#### **COUNT ELEVEN**

On or about January 6, 2021, within the District of Columbia, GRADY DOUGLAS OWENS, 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 temporarily visiting, and during and in relation to the offense, did use and carry a dangerous weapon, that is, a skateboard, and the offense resulted in significant bodily injury.

(Engaging in Physical Violence in a Restricted Building or Grounds, Using and Carrying a Dangerous Weapon, Resulting in Significant Bodily Injury, in violation of Title 18, United States Code, Sections 1752(a)(4) and (b)(1)(A) and (B))

# **COUNT TWELVE**

On or about January 6, 2021, within the District of Columbia, JASON DOUGLAS OWENS, 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 temporarily visiting.

(Engaging in Physical Violence in a Restricted Building or Grounds, in violation of Title 18, United States Code, Sections 1752(a)(4)

# **COUNT THIRTEEN**

On or about January 6, 2021, within the District of Columbia, GRADY DOUGLAS OWENS and JASON DOUGLAS OWENS, willfully and knowingly engaged in disorderly and disruptive conduct within the United States Capitol Grounds 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 FOURTEEN

On or about January 6, 2021, within the District of Columbia, GRADY DOUGLAS OWENS and JASON DOUGLAS OWENS, willfully and knowingly engaged in an act of physical violence within the United States Capitol Grounds.

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

A TRUE BILL:

FOREPERSON.

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

Matthew Graves prix