

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on September 15, 2022

UNITED STATES OF AMERICA

v.

RYAN SAMSEL,
JAMES TATE GRANT,
PAUL RUSSELL JOHNSON,
STEPHEN CHASE RANDOLPH,
JASON BENJAMIN BLYTHE,

Defendants.

CRIMINAL NO. 21-CR-537-JMC

VIOLATIONS:

18 U.S.C. §§ 231(a)(3), 2

(Civil Disorder)

18 U.S.C. §§ 111(a)(1) and (b), 2

(Assaulting, Resisting, or Impeding

Certain Officers Using a Deadly or

Dangerous Weapon and 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)

(Entering and Remaining in a Restricted

Building or Grounds with a Deadly or

Dangerous Weapon)

18 U.S.C. §§ 1752(a)(2) and (b)(1)(A)

(Disorderly and Disruptive Conduct in a

Restricted Building or Grounds with a

Deadly or Dangerous Weapon)

18 U.S.C. §§ 1752(a)(4), (b)(1)(A),

(b)(1)(B), 2)

(Engaging in Physical Violence in a

Restricted Building or Grounds with a

Deadly or Dangerous Weapon and

Resulting in Significant Bodily Injury)

40 U.S.C. §§ 5104(e)(2)(D)

(Disorderly Conduct in the Capitol

Grounds or Buildings)

40 U.S.C. §§ 5104(e)(2)(F), 2

(Act of Physical Violence in the Capitol

Grounds or Buildings)

18 U.S.C. §§ 1512(c)(2), 2

(Obstruction of an Official Proceeding)

18 U.S.C. §§ 111(a)(1) and (b), 2

(Assaulting, Resisting, or Impeding

- : **Certain Officers Using a Dangerous**
- : **Weapon)**
- : **40 U.S.C. § 5104(e)(2)(C)**
- : **(Entering and Remaining in Certain**
- : **Rooms in the Capitol Building)**
- : **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, **RYAN SAMSEL, JAMES TATE GRANT, PAUL RUSSELL JOHNSON, STEPHEN CHASE RANDOLPH,** and **JASON BENJAMIN BLYTHE,** along with others known and unknown to the Grand Jury, committed and attempted to commit an act to obstruct, impede, and interfere with law enforcement officers, that is, Officer C.E. and Officer D.C. and other officers from the United States Capitol Police, 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, Sections 231(a)(3), 2)

COUNT TWO

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL, JAMES TATE GRANT, PAUL RUSSELL JOHNSON, STEPHEN CHASE RANDOLPH,** and **JASON BENJAMIN BLYTHE,** along with others known and unknown to the Grand Jury, using a deadly or dangerous weapon, that is, a metal crowd control barrier, 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), that is, Officer C.E., 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 involved 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), 2)

COUNT THREE

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL, JAMES TATE GRANT, PAUL RUSSELL JOHNSON, STEPHEN CHASE RANDOLPH,** and **JASON BENJAMIN BLYTHE,** along with others known and unknown to the Grand Jury, using a deadly or dangerous weapon, that is, a metal crowd control barrier, 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), that is, Officer D.C., 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 involved 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), 2)

COUNT FOUR

On or about January 6, 2021, within the District of Columbia, **STEPHEN CHASE RANDOLPH** 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), that is, Officer D.C., 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 FIVE

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL, JAMES TATE GRANT, PAUL RUSSELL JOHNSON, STEPHEN CHASE RANDOLPH,** and **JASON BENJAMIN BLYTHE**, 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, and, during and in relation to the offense, did use and carry a deadly and dangerous weapon, that is, a metal crowd control barrier.

(Entering and Remaining in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, in violation of Title 18, United States Code, Sections 1752(a)(1) and (b)(1)(A))

COUNT SIX

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL, JAMES TATE GRANT, PAUL RUSSELL JOHNSON, STEPHEN CHASE RANDOLPH,** and **JASON BENJAMIN BLYTHE**, 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 and, during and in relation to the offense, did use and carry a deadly and dangerous weapon, that is, a metal crowd control barrier.

(Disorderly and Disruptive Conduct in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, in violation of Title 18, United States Code, Sections 1752(a)(2) and (b)(1)(A))

COUNT SEVEN

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL, JAMES TATE GRANT, PAUL RUSSELL JOHNSON, STEPHEN CHASE RANDOLPH,** and **JASON BENJAMIN BLYTHE**, along with others known and unknown to the Grand Jury, 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 offenses, did use and carry a deadly and dangerous

weapon, that is, a metal crowd control barrier, and where the acts in violation of this section resulted in significant bodily injury.

(Engaging in Physical Violence in a Restricted Building or Grounds with a Deadly or Dangerous Weapon, Resulting in Significant Bodily Injury, and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1752(a)(4), (b)(1)(A), (b)(1)(B), and 2)

COUNT EIGHT

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL, JAMES TATE GRANT, PAUL RUSSELL JOHNSON, STEPHEN CHASE RANDOLPH,** and **JASON BENJAMIN BLYTHE,** 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 NINE

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL, JAMES TATE GRANT, PAUL RUSSELL JOHNSON, STEPHEN CHASE RANDOLPH,** and **JASON BENJAMIN BLYTHE,** along with others known and unknown to the Grand Jury, 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 and Aiding and Abetting, in violation of Title 40, United States Code, Section 5104(e)(2)(F) and Title 18 United States Code, Section 2)

COUNT TEN

On or about January 6, 2021, within the District of Columbia and elsewhere, **RYAN SAMSEL, JAMES TATE GRANT, PAUL RUSSELL JOHNSON, STEPHEN CHASE RANDOLPH,** and **JASON BENJAMIN BLYTHE**, along with others known and unknown to the Grand Jury, 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 ELEVEN

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL**, committed and attempted to commit an act to obstruct, impede, and interfere with law enforcement officers, that is officers from the United States Capitol Police guarding the West Plaza, 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 TWELVE

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL**, 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), while such officer or employee was engaged in and on account of the

performance of official duties, that is, officers from the United States Capitol Police guarding the West Plaza, and where the acts in violation of this section involved physical contact with the officer 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 THIRTEEN

On or about January 6, 2021, within the District of Columbia, **RYAN SAMSEL**, using a deadly or dangerous weapon, that is, a plank of wood, 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, officers from the Metropolitan Police Department, while such persons were engaged in and on account of the performance of official duties, and where the acts in violation of this section involved physical contact with the victim and the intent to commit another felony.

(Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon, , and Aiding and Abetting, in violation of Title 18, United States Code, Sections 111(a)(1) and (b), 2)

COUNT FOURTEEN

On or about January 6, 2021, within the District of Columbia, **JAMES TATE GRANT**, willfully and knowingly, and with the intent to disrupt the orderly conduct of official business, entered and remained in a room in any of the Capitol Buildings set aside and designated for the use of either House of Congress and a Member, committee, officer, and employee of Congress, and either House of Congress, and the Library of Congress, without authorization to do so.

(Entering and Remaining in Certain Rooms in the Capitol Building, in violation of Title 40, United States Code, Section 5104(e)(2)(C))

COUNT FIFTEEN

On or about January 6, 2021, within the District of Columbia, **JAMES TATE GRANT**, 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.

Matthew M. Gansby
MB

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