UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : CRIMINAL NO.

:

v. : MAGISTRATE NO. 21-MJ-293

:

BRANDON J. MILLER

: VIOLATIONS:

AND : 18 U.S.C. § 1752(a)(1)

(Entering and Remaining in a Restricted

STEPHANIE D. MILLER, : Building or Grounds)

:

:

Defendants. : 18 U.S.C. § 1752(a)(2)

: (Disorderly and Disruptive Conduct 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)(G)

: (Parading, Demonstrating, or Picketing in

a Capitol Building)

<u>INFORMATION</u> Case: 1:21-cr-00266

Assigned to: Judge Chutkan, Tanya S.

The United States Attorney charges that at all relevant times: Assign Date: 3/30/2021

Description: INFORMATION (A)

COUNT ONE

On or about January 6, 2021, in the District of Columbia, **BRANDON J. MILLER** and **STEPHANIE D. MILLER** did unlawfully and 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 and Vice President-elect were 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 TWO

On or about January 6, 2021, in the District of Columbia, **BRANDON J. MILLER** and **STEPHANIE D. MILLER** 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 and Vice President-elect were 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 THREE

On or about January 6, 2021, in the District of Columbia, **BRANDON J. MILLER** and **STEPHANIE D. MILLER** willfully and knowingly engaged in disorderly and disruptive conduct 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 FOUR

On or about January 6, 2021, in the District of Columbia, **BRANDON J. MILLER** and **STEPHANIE D. MILLER** 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,

CHANNING D. PHILLIPS Acting United States Attorney D.C. Bar No. 415793

By: /s/ Clayton O'Connor

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