

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	CASE NO.:
	:	
v.	:	MAGISTRATE NO.: 22-mj-00109
	:	
CHADWICK GORDON CLIFTON,	:	VIOLATIONS:
a/k/a "Chad Clifton"	:	
a/k/a "Chad G. Clifton,"	:	18 U.S.C. § 1752(a)(1)
	:	(Entering and Remaining in a Restricted
and	:	Building or Grounds)
	:	
DAVID CHARLES JOHNSTON,	:	18 U.S.C. § 1752(a)(2)
a/k/a "Dave Johnston,"	:	(Disorderly and Disruptive Conduct in a
	:	Restricted Building or Grounds)
	:	
	:	40 U.S.C. § 5104(e)(2)(D)
Defendants.	:	(Disorderly Conduct on Capitol Grounds)
	:	
	:	40 U.S.C. § 5104(e)(2)(G)
	:	(Parading, Demonstrating, or Picketing
	:	in a Capitol Building)

INFORMATION

The United States Attorney charges that at all relevant times:

COUNT ONE

On or about January 6, 2021, within the District of Columbia, **CHADWICK GORDON CLIFTON** and **DAVID CHARLES JOHNSTON**, knowingly entered and remained in the United States Capitol, a restricted building, 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, within the District of Columbia, **CHADWICK GORDON CLIFTON** and **DAVID CHARLES JOHNSTON**, knowingly, and with intent to impede and disrupt the orderly conduct of Government business and official functions, engaged in disorderly and disruptive conduct in, and within such proximity to, the United States Capitol, a restricted building, 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, within the District of Columbia, **CHADWICK GORDON CLIFTON** and **DAVID CHARLES JOHNSTON**, 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 or either House of Congress.

(Disorderly Conduct on Capitol Grounds, in violation of Title 40, United States Code, Section 5104(e)(2)(D))

COUNT FOUR

On or about January 6, 2021, within the District of Columbia, **CHADWICK GORDON CLIFTON** and **DAVID CHARLES JOHNSTON**, willfully and knowingly paraded, demonstrated, and picketed in a 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,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Ashley Akers
ASHLEY AKERS
MO Bar No. 69609
Trial Attorney, Detailee
1100 L Street NW
Washington, DC 20005
(202) 353-0521
Ashley.Akers@usdoj.gov