

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on February 14, 2022

RECEIVED

JUN 29 2022

Clerk, U.S. District and
Bankruptcy Courts

UNITED STATES OF AMERICA	:	CRIMINAL NO. 22-cr-
	:	
v.	:	GRAND JURY ORIGINAL
	:	
MICHAEL THOMAS PRUDEN,	:	VIOLATIONS:
	:	
Defendant.	:	Counts 1-5: 18 U.S.C. § 113(a)(3)
	:	(Assault on Federal Land)
	:	
	:	Counts 6-7: 18 U.S.C. § 912
	:	(Impersonation of a Federal Officer)
	:	
	:	U.S.S.G. § 3A1.1(a)
	:	(Bias Motive)

INDICTMENT

The Grand Jury charges that, at times material to this Indictment, on or about the dates stated below:

Introduction

1. Meridian Hill Park, a.k.a. Malcolm X Park, was a United States National Park property administered by the National Park Service, and was policed by the United States Park Police.

2. Meridian Hill Park was located within Washington, D.C. and was bordered by Euclid St. N.W. on its north side, 15th Street N.W. on its east side, W St. N.W. on its south side, and 16th St. N.W. on its west side.

3. After nightfall, Meridian Hill Park was informally known in the Washington, D.C. community to be a meeting location for men seeking to engage in consensual sexual encounters with other men. This practice is colloquially known as “cruising.”

4. MICHAEL THOMAS PRUDEN frequented Meridian Hill Park after nightfall, and on multiple occasions, including those described below, assaulted men in Meridian Hill Park by approaching them with a flashlight, giving police-style commands, and spraying them with a chemical irritant.

COUNT ONE

(Assault within the Territorial Jurisdiction of the United States—18 U.S.C. § 113(a)(3))

5. The allegations in paragraphs 1 through 4 are realleged and incorporated as if fully set forth herein.

6. On April 30, 2018, at Meridian Hill Park, the defendant, **MICHAEL THOMAS PRUDEN**, assaulted John Doe 1 with a dangerous weapon, specifically a chemical irritant, with the intent to do bodily harm to John Doe 1.

(In violation of Title 18, United States Code, Section 113(a)(3))

COUNT TWO

(Assault within the Territorial Jurisdiction of the United States—18 U.S.C. § 113(a)(3))

7. The allegations in paragraphs 1 through 4 are realleged and incorporated as if fully set forth herein.

8. On March 13, 2020, at Meridian Hill Park, the defendant, **MICHAEL THOMAS PRUDEN**, assaulted John Doe 2 with a dangerous weapon, specifically a chemical irritant, with the intent to do bodily harm to John Doe 2.

(In violation of Title 18, United States Code, Section 113(a)(3))

COUNT THREE

(Assault within the Territorial Jurisdiction of the United States—18 U.S.C. § 113(a)(3))

9. The allegations in paragraphs 1 through 4 are realleged and incorporated as if fully set forth herein.

10. On June 11, 2020, at Meridian Hill Park, the defendant, **MICHAEL THOMAS PRUDEN**, assaulted John Doe 3 with a dangerous weapon, specifically a chemical irritant, with the intent to do bodily harm to John Doe 3.

(In violation of Title 18, United States Code, Section 113(a)(3))

COUNT FOUR

(Assault within the Territorial Jurisdiction of the United States—18 U.S.C. § 113(a)(3))

11. The allegations in paragraphs 1 through 4 are realleged and incorporated as if fully set forth herein.

12. In February 2021, at Meridian Hill Park, the defendant, **MICHAEL THOMAS PRUDEN**, assaulted John Doe 4 with a dangerous weapon, specifically a chemical irritant, with the intent to do bodily harm to John Doe 4.

(In violation of Title 18, United States Code, Section 113(a)(3))

COUNT FIVE

(Assault within the Territorial Jurisdiction of the United States—18 U.S.C. § 113(a)(3))

13. The allegations in paragraphs 1 through 4 are realleged and incorporated as if fully set forth herein.

14. On March 26, 2021, at Meridian Hill Park, the defendant, **MICHAEL THOMAS PRUDEN**, assaulted John Doe 5 with a dangerous weapon, specifically a chemical irritant, with the intent to do bodily harm to John Doe 5.

(In violation of Title 18, United States Code, Section 113(a)(3))

COUNT SIX

(Impersonation of an Officer and Employee of the United States—18 U.S.C. § 912)

15. The allegations in paragraphs 1 through 4 and 9 through 10 are realleged and incorporated as if fully set forth herein.

16. On the date specified in Count Three, at Meridian Hill Park, the defendant, **MICHAEL THOMAS PRUDEN**, falsely assumed and pretended to be an officer and employee acting under the authority of the United States and any department, agency, and officer thereof, that is, the United States Park Police, and acted as such. In so doing, he committed one or more of the following overt acts, among others:

- a. Approaching individuals in Meridian Hill Park with a flashlight;
- b. Giving individuals in Meridian Hill Park police-style commands;
- c. Spraying individuals in Meridian Hill Park with a chemical irritant.

(In violation of Title 18, United States Code, Section 912)

COUNT SEVEN

(Impersonation of an Officer and Employee of the United States—18 U.S.C. § 912)

17. The allegations in paragraphs 1 through 4 and 11 through 12 are realleged and incorporated as if fully set forth herein.

18. On the date specified in Count Four, at Meridian Hill Park, the defendant, **MICHAEL THOMAS PRUDEN**, falsely assumed and pretended to be an officer and employee acting under the authority of the United States and any department, agency, and officer thereof, that is, the United States Park Police, and acted as such. In so doing, he committed one or more of the following overt acts, among others:

- a. Approaching individuals in Meridian Hill Park with a flashlight;
- b. Giving individuals in Meridian Hill Park police-style commands;
- c. Spraying individuals in Meridian Hill Park with a chemical irritant.

(In violation of Title 18, United States Code, Section 912)

SPECIAL FINDING

19. The allegations in paragraphs 1 through 18 are realleged and incorporated as if fully set forth herein.

20. The defendant, **MICHAEL THOMAS PRUDEN**, intentionally selected John Doe 1, John Doe 2, John Doe 3, and John Doe 4 as the object of the offenses charged in Counts One, Two, Three, and Four because of the actual and perceived sexual orientation of any person.

(Selection of the Object of the Offense Because of the Sexual Orientation
of Any Person, pursuant to U.S.S.G. § 3A1.1(a))

A TRUE BILL:

FOREPERSON



MATTHEW M. GRAVES
ATTORNEY FOR THE UNITED STATES
IN AND FOR THE DISTRICT OF COLUMBIA

KRISTEN M. CLARKE
ASSISTANT ATTORNEY GENERAL
CIVIL RIGHTS DIVISION