

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term**

**Grand Jury Sworn in on January 8, 2021**

|                                 |   |  |
|---------------------------------|---|--|
| <b>UNITED STATES OF AMERICA</b> | : | <b>CRIMINAL NO.</b>                            |
|                                 | : |  |
| <b>v.</b>                       | : | <b>MAGISTRATE NO. 21-MJ-516</b>                |
|                                 | : |  |
| <b>MARK S. IBRAHIM,</b>         | : | <b>VIOLATIONS:</b>                             |
|                                 | : | <b>18 U.S.C. §§ 1752(a)(1) and (b)(1)(A)</b>   |
| <b>Defendant.</b>               | : | <b>(Entering and Remaining in a Restricted</b> |
|                                 | : | <b>Building or Grounds with a Deadly or</b>    |
|                                 | : | <b>Dangerous Weapon)</b>                       |
|                                 | : | <b>40 U.S.C. § 5104(d)</b>                     |
|                                 | : | <b>(Injuries to Property)</b>                  |
|                                 | : | <b>40 U.S.C. § 5104(e)(1)(A)(i)</b>            |
|                                 | : | <b>(Firearms and Dangerous Weapons on</b>      |
|                                 | : | <b>Capitol Grounds)</b>                        |
|                                 | : | <b>18 U.S.C. § 1001(a)(2)</b>                  |
|                                 | : | <b>(False Statements and Representations)</b>  |

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

On or about January 6, 2021, within the District of Columbia, **MARK S. IBRAHIM**, did knowingly enter and remain in or on restricted 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 and did during and in relation to the offense, use and carry a deadly and dangerous weapon and firearm.

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

**COUNT TWO**

On or about January 6, 2021, within the District of Columbia, **MARK S. IBRAHIM**, did step or climb on, a statue, seat, wall, fountain, or other erection or architectural feature in the Grounds of the Capitol.

**(Injuries to Property**, in violation of Title 40, United States Code, Section 5104(d))

**COUNT THREE**

On or about January 6, 2021, within the District of Columbia, **MARK S. IBRAHIM**, did carry on and have readily accessible on the Grounds of the Capitol a firearm and a dangerous weapon.

**(Firearms and Dangerous Weapons on Capitol Grounds**, in violation of Title 40, United States Code, Section 5104(e)(1)(A)(i))

**COUNT FOUR**

On or about March 15, 2021, within the District of Columbia and elsewhere, **MARK S. IBRAHIM**, did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a criminal matter in the District of Columbia within the jurisdiction of the executive branch of the Government of the United States, by stating to a Special Agent of the Office of the Inspector General that he did not knowingly expose his firearm and DEA badge on the Grounds of the United States Capitol Building on January 6, 2021, in the District of Columbia. Specifically, **MARK S. IBRAHIM** stated "I had my creds. I had my firearm, and my badge on me ... **But never exposed** ... Not that I know of." The statements and representations were false because, as **MARK S. IBRAHIM** then and there knew, he did expose

his firearm and DEA badge while on the grounds of the United States Capitol Building on January 6, 2021, in the District of Columbia.

**(False Statements and Representations, in violation of Title 18, United States Code, Section 1001(a)(2))**

A TRUE BILL:

FOREPERSON.

A handwritten signature in black ink, appearing to read "Chang D. Phillips" followed by a stylized flourish.

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