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

**Holding a Criminal Term**

**Grand Jury Sworn in June 14, 2024**

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 24-CR-332**  
: **v.** : **VIOLATIONS:**  
**NAHVARJ MILLS** : **18 U.S.C. §§ 2261A(2)(B), 2261(b)(6)**  
: **(Cyberstalking in Violation of a Protection**  
: **Order)**  
**Defendant.** : **18 U.S.C. § 2261A(2)(B)**  
: **(Cyberstalking)**  
: **18 U.S.C. §§ 2261A(1)(B), 2261(b)(6)**  
: **(Interstate Stalking in Violation of a**  
: **Protection Order)**  
: **18 U.S.C. §§ 2261A(1)(A), 2261(A)(1)(B),**  
: **2261(b)(3), (b)(6)**  
: **(Interstate Stalking in Violation of a**  
: **Protection Order – Bodily Injury,**  
: **Emotional Distress, Use of a Dangerous**  
: **Weapon)**  
: **18 U.S.C. § 2262(a)(1)**  
: **(Interstate Violation of a Protection Order)**  
: **18 U.S.C. §§ 2262(a)(1), (b)(3)**  
: **(Interstate Violation of a Protection Order,**  
: **Use of a Dangerous Weapon)**  
: **18 U.S.C. §§ 2261(a)(1), (b)(3)**  
: **(Interstate Domestic Violence, Use of a**  
: **Dangerous Weapon)**  
: **18 U.S.C. § 922(g)(1)**  
: **(Unlawful Possession of a Firearm and**  
: **Ammunition by a Person Convicted of a**  
: **Crime Punishable by Imprisonment for a**  
: **Term Exceeding One Year)**  
:

- : 18 U.S.C. § 924(c)(1)(A)(ii), (iii)
- : (Using, Carrying, Possessing, Brandishing,
- : and Discharging a Firearm During and in
- : Relation to a Crime of Violence)
- :
- : 18 U.S.C. § 875(d)
- : (Interstate Communications with Intent to
- : Extort)
- :
- : 22 D.C. Code §§ 401, 4502
- : (Assault with Intent to Kill While Armed)
- :
- : 22 D.C. Code § 402
- : (Assault with a Dangerous Weapon)
- :
- : 22 D.C. Code § 4504(b)
- : (Possession of a Firearm During a Crime of
- : Violence)
- :
- : 22 D.C. Code § 3053(a)
- : (First Degree Unlawful Publication)
- :
- : 18 U.S.C. § 924(d), 21 U.S.C. § 853(a) and
- : (p), 28 U.S.C. § 2461(c) (Forfeiture
- : Allegation)

**SUPERSEDING INDICTMENT**

The Grand Jury Charges that:

**COUNT ONE**

Between on or about November 22, 2023, and February 7, 2024, within the District of Columbia and elsewhere, the defendant **NAHVARJ MILLS**, with the intent to kill, injure, harass, and intimidate another person, M.J., used the mail, any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce to engage in a course of conduct that caused,

attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, M.J.

The Grand Jury further charges that the defendant committed the crime of cyberstalking in violation of a protection order, as that term is defined by title 18, United States Code, Section 2266(5).

**(Cyberstalking in Violation of a Protection Order, in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(6))**

**COUNT TWO**

Between on or about December 27, 2024, and February 7, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, with the intent to kill, injure, harass, and intimidate another person, T.G., used the mail, any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, T.G.

**(Cyberstalking, in violation of Title 18, United States Code, Section 2261A(2)(B))**

**COUNT THREE**

On or about January 20, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, travelled in interstate commerce from the State of Maryland to the District of Columbia with the intent to kill, injure, harass, and intimidate another person, M.J., and in the course of, or as a result of, such travel engaged in conduct that caused, attempted to

cause, and would be reasonably expected to cause substantial emotional distress to another person, M.J.

The Grand Jury further charges that the defendant committed the crime of stalking in violation of a protection order, as that term is defined by title 18, United States Code, Section 2266(5).

**(Interstate Stalking in Violation of a Protection Order, in violation of Title 18, United States Code, Sections 2261A(1)(B) and 2261(b)(6))**

**COUNT FOUR**

On or about January 21, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, travelled in interstate commerce from the State of Maryland to the District of Columbia with the intent to kill, injure, harass, and intimidate another person, M.J., and in the course of, or as a result of, such travel engaged in conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to another person, M.J.

The Grand Jury further charges that the defendant used a dangerous weapon, that is, a firearm, during the offense.

The Grand Jury further charges that the defendant committed the crime of stalking in violation of a protection order, as that term is defined by title 18, United States Code, Section 2266(5).

**(Interstate Stalking in Violation of a Protection Order – Emotional Distress, Use of a Dangerous Weapon, in violation of Title 18, United States Code, Sections 2261A(1)(B), 2261(b)(3), and 2261(b)(6))**

**COUNT FIVE**

On or about January 22, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, travelled in interstate commerce from the State of Maryland to

the District of Columbia with the intent to kill, injure, harass, and intimidate another person, M.J., and in the course of, or as a result of, such travel engaged in conduct that placed another person, M.J., in reasonable fear of death and serious bodily injury and caused and attempted to cause substantial emotional distress to another person, M.J.

The Grand Jury further charges that the defendant used a dangerous weapon, that is, a firearm, during the offense.

The Grand Jury further charges that the defendant committed the crime of interstate stalking in violation of a protection order, as that term is defined by title 18, United States Code, Section 2266(5).

**(Interstate Stalking in Violation of a Protection Order – Bodily Injury, Emotional Distress, Use of a Dangerous Weapon, in violation of Title 18, United States Code, Sections 2261A(1)(A), 2261A(1)(B), 2261(b)(3), and 2261(b)(6))**

**COUNT SIX**

On or about January 23, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, travelled in interstate commerce from the State of Maryland to the District of Columbia with the intent to kill, injure, harass, and intimidate another person, M.J., and in the course of, or as a result of, such travel engaged in conduct that placed M.J. in reasonable fear of death and serious bodily injury and caused and attempted to cause substantial emotional distress to another person, M.J.

The Grand Jury further charges that the defendant used a dangerous weapon, that is, a firearm, during the offense.

The Grand Jury further charges that the defendant committed the crime of interstate stalking in violation of a protection order, as that term is defined by title 18, United States Code, Section 2266(5).

**(Interstate Stalking in Violation of a Protection Order – Bodily Injury, Emotional Distress, Use of a Dangerous Weapon, in violation of Title 18, United States Code, Sections 2261A(1)(A), 2261A(1)(B), 2261(b)(3), and 2261(b)(6))**

**COUNT SEVEN**

On or about January 20, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, travelled in interstate commerce with the intent to engage in conduct that would violate the portion of protection order 2024 CPO 000061, issued by the Superior Court of the District of Columbia, that prohibited physical proximity to M.J., and did subsequently engage in such conduct.

**(Interstate Violation of a Protection Order, in violation of Title 18, United States Code, Section 2262(a)(1))**

**COUNT EIGHT**

On or about January 21, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, travelled in interstate commerce with the intent to engage in conduct that would violate the portion of protection order 2024 CPO 000061, issued by the

Superior Court of the District of Columbia, that provided protection against violence towards M.J., and did subsequently engage in such conduct.

The Grand Jury further charges that the defendant used a dangerous weapon, that is, a firearm, during the offense.

**(Interstate Violation of a Protection Order, Use of a Dangerous Weapon** in violation of Title 18, United States Code, Sections 2262(a)(1), (b)(3))

**COUNT NINE**

On or about January 22, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, travelled in interstate commerce with the intent to engage in conduct that would violate the portion of protection order 2024 CPO 000061, issued by the Superior Court of the District of Columbia, that provided protection against violence towards M.J., and did subsequently engage in such conduct.

The Grand Jury further charges that the defendant used a dangerous weapon, that is, a firearm, during the offense.

**(Interstate Violation of a Protection Order, Use of a Dangerous Weapon**, in violation of Title 18, United States Code, Sections 2262(a)(1), (b)(3))

**COUNT TEN**

On or about January 23, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, travelled in interstate commerce with the intent to engage in conduct that would violate the portion of protection order 2024 CPO 000061, issued by the

Superior Court of the District of Columbia, that provided protection against violence towards M.J., and did subsequently engage in such conduct.

The Grand Jury further charges that the defendant used a dangerous weapon, that is, a firearm, during the offense.

**(Interstate Violation of a Protection Order, Use of a Dangerous Weapon, in violation of Title 18, United States Code, Sections 2262(a)(1), (b)(3))**

**COUNT ELEVEN**

On or about January 23, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, travelled in interstate commerce with the intent to kill, injure, harass, and intimidate M.J., an intimate partner and dating partner of **MILLS**, and, while in the course of and as a result of such travel, committed and attempted to commit Assault with Intent to Kill While Armed, a crime of violence against M.J., that is, Count Seventeen, which is incorporated herein.

The Grand Jury further charges that the defendant used a dangerous weapon, that is, a firearm, during the offense.

**(Interstate Domestic Violence, Use of a Dangerous Weapon in violation of Title 18, United States Code, Sections 2261(a)(1) and (b)(3))**

**COUNT TWELVE**

On or about January 21, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Charles County Circuit Court Case Number 08K14000007, did unlawfully and knowingly receive and possess a firearm, that is a .40 caliber Taurus pistol, and did unlawfully and knowingly receive and possess ammunition, that is .40



caliber ammunition, which had been possessed, shipped, and transported in and affecting interstate and foreign commerce.

**(Unlawful Possession of a Firearm and Ammunition by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year,** in violation of Title 18, United States Code, Section 922(g)(1))

**COUNT THIRTEEN**

On or about January 22, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Charles County Circuit Court Case Number 08K14000007, did unlawfully and knowingly receive and possess a firearm, that is a .40 caliber Taurus pistol, and did unlawfully and knowingly receive and possess ammunition, that is .40 caliber ammunition, which had been possessed, shipped, and transported in and affecting interstate and foreign commerce.

**(Unlawful Possession of a Firearm and Ammunition by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year,** in violation of Title 18, United States Code, Section 922(g)(1))

**COUNT FOURTEEN**

On or about January 23, 2024, within the District of Columbia and elsewhere, the defendant, **NAHVARJ MILLS**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Charles County Circuit Court Case Number 08K14000007, did unlawfully and knowingly receive and possess a firearm, that is a .40 caliber Taurus pistol, and did unlawfully and knowingly receive and possess ammunition, that is .40

caliber ammunition, which had been possessed, shipped, and transported in and affecting interstate and foreign commerce.

**(Unlawful Possession of a Firearm and Ammunition by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year,** in violation of Title 18, United States Code, Section 922(g)(1))

**COUNT FIFTEEN**

On or about January 23, 2024, within the District of Columbia, the defendant, **NAHVARJ MILLS**, did unlawfully and knowingly use, carry, brandish, and discharge a firearm during and in relation to, and possess in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is, Count Eleven, which is incorporated herein.

**(Using, Carrying, Brandishing, and Discharging a Firearm During and in Relation to, or Possessing a Firearm in Furtherance of a Crime of Violence,** in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (iii))

**COUNT SIXTEEN**

On or about January 1, 2024, the defendant, **NAHVARJ MILLS**, knowingly transmitted in interstate commerce, from Maryland to the District of Columbia, with the intent to extort from M.J. a thing of value, namely sexual acts, a communication containing a threat to injure the reputation of M.J.

**(Interstate Communications with Intent to Extort,** in violation of Title 18, United States Code, Section 875(d))

**COUNT SEVENTEEN**

On or about January 23, 2024, within the District of Columbia, the defendant, **NAHVARJ MILLS**, while armed with and having readily available a firearm, assaulted M.J. with the intent to kill M.J.

**(Assault With Intent to Kill While Armed,** in violation of 22 D.C. Code Sections 401, 4502)

**COUNT EIGHTEEN**

On or about December 30, 2023, within the District of Columbia, the defendant, **NAHVARJ MILLS**, assaulted M.J. with a dangerous weapon, that is, a firearm.

**(Assault With a Dangerous Weapon, in violation of 22 D.C. Code, Section 402)**

**COUNT NINETEEN**

On or about January 21, 2024, within the District of Columbia, the defendant, **NAHVARJ MILLS**, assaulted M.J. with a dangerous weapon, that is, a firearm.

**(Assault With a Dangerous Weapon, in violation of 22 D.C. Code, Section 402)**

**COUNT TWENTY**

On or about January 22, 2024, within the District of Columbia, the defendant, **NAHVARJ MILLS**, assaulted M.J. with a dangerous weapon, that is, a firearm.

**(Assault With a Dangerous Weapon, in violation of 22 D.C. Code, Section 402)**

**COUNT TWENTY-ONE**

On or about December 30, 2023, within the District of Columbia, the defendant, **NAHVARJ MILLS**, did possess a firearm while committing the crime of Assault with a Dangerous Weapon, as set forth in Count Eighteen of this Indictment.

**(Possession of a Firearm During a Crime of Violence, in violation of 22 D.C. Code, Section 4504(b))**

**COUNT TWENTY-TWO**

On or about January 21, 2024, within the District of Columbia, the defendant, **NAHVARJ MILLS**, did possess a firearm while committing the crime of Assault with a Dangerous Weapon, as set forth in Count Nineteen of this Indictment.

**(Possession of a Firearm During a Crime of Violence**, in violation of 22 D.C. Code, Section 4504(b))

**COUNT TWENTY-THREE**

On or about January 22, 2024, within the District of Columbia, the defendant, **NAHVARJ MILLS**, did possess a firearm while committing the crime of Assault with a Dangerous Weapon, as set forth in Count Twenty of this Indictment.

**(Possession of a Firearm During a Crime of Violence**, in violation of 22 D.C. Code, Section 4504(b))

**COUNT TWENTY-FOUR**

On or about January 6, 2024, within the District of Columbia, the defendant, **NAHVARJ MILLS**, did unlawfully and knowingly publish one or more sexual images of M.J., an identified and identifiable person, when M.J. did not consent to the disclosure of the sexual image, there was an agreement and understanding between M.J. and **MILLS** that the sexual image would not be disclosed, and **MILLS** made the disclosure with the intent to harm M.J.

**(First Degree Unlawful Publication**, in violation of 22 D.C. Code, Section 3053(a))

**COUNT TWENTY-FIVE**

On or about January 11, 2024, within the District of Columbia, the defendant, **NAHVARJ MILLS**, did unlawfully and knowingly publish one or more sexual images of M.J., an identified and identifiable person, when M.J. did not consent to the disclosure of the sexual image, there was

an agreement and understanding between M.J. and MILLS that the sexual image would not be disclosed, and MILLS made the disclosure with the intent to harm M.J.

**(First Degree Unlawful Publication, in violation of 22 D.C. Code, Section 3053(a))**

**COUNT TWENTY-SIX**

On or about January 20, 2024, within the District of Columbia, the defendant, NAHVARJ MILLS, did unlawfully and knowingly publish one or more sexual images of M.J., an identified and identifiable person, when M.J. did not consent to the disclosure of the sexual image, there was an agreement and understanding between M.J. and MILLS that the sexual image would not be disclosed, and MILLS made the disclosure with the intent to harm M.J.

**(First Degree Unlawful Publication, in violation of 22 D.C. Code, Section 3053(a))**

**COUNT TWENTY-SEVEN**

Between on or about January 19, 2024, and January 29, 2024, within the District of Columbia, the defendant, NAHVARJ MILLS, did unlawfully and knowingly publish one or more sexual images of M.J., an identified and identifiable person, when M.J. did not consent to the disclosure of the sexual image, there was an agreement and understanding between M.J. and MILLS that the sexual image would not be disclosed, and MILLS made the disclosure with the intent to harm M.J.

**(First Degree Unlawful Publication, in violation of 22 D.C. Code, Section 3053(a))**

**FORFEITURE NOTICE**

1. Upon conviction of the offenses alleged in Counts Twelve through Fifteen of this Indictment, NAHVARJ MILLS shall forfeit to the United States, pursuant to Title 18 United States Code, Sections 924(d) and Title 28, United States Code, Section 2461(c), any firearms and

ammunition involved in or used in the knowing commission of these offenses, including but not limited to a .40 caliber Taurus.

2. Upon conviction of the offenses alleged in Counts One through Eleven and Sixteen of this Indictment, **NAHVARJ MILLS** shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of this offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, this offense. The United States will also seek a forfeiture money judgment against **MILLS** equal to the value of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of this offense; and any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, this offense.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of **NAHVARJ MILLS**:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

**MILLS** shall forfeit to the United States any other property, up to the value of the property described above, pursuant to 21 U.S.C. Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

**(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853(a) and (p), and Title 28, United States Code, Section 2461(c))**

A TRUE BILL

FOREPERSON

*Matthew M. Garco / JJI*

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