

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

**Holding a Criminal Term  
Grand Jury Sworn in on May 21, 2014**

<b>UNITED STATES OF AMERICA,</b>	:	<b>CRIMINAL NO.</b>
	:	
<b>v.</b>	:	
	:	
<b>DOUGLAS HUGHES,</b>	:	<b>VIOLATIONS: 49 U.S.C. § 46306(b)(7)</b>
<b>Also known as Doug Hughes,</b>	:	<b>(Operating as an Airman</b>
<b>Defendant.</b>	:	<b>Without an Airman’s</b>
	:	<b>Certificate)</b>
	:	
	:	<b>49 U.S.C. § 46306(b)(5)(A)</b>
	:	<b>(Owning an Aircraft that is</b>
	:	<b>Knowingly Operated When</b>
	:	<b>the Aircraft is Not</b>
	:	<b>Registered)</b>
	:	
	:	<b>49 U.S.C. §§ 46307 and</b>
	:	<b>40103(b) (Violation of</b>
	:	<b>National Defense Airspace)</b>
	:	
	:	<b>18 U.S.C. § 1731 (Vehicle</b>
	:	<b>Falsely Labeled as Postal</b>
	:	<b>Carrier)</b>
	:	
	:	<b>49 U.S.C. § 46306(d)(1), 28</b>
	:	<b>U.S.C. § 2461(c), and 21</b>
	:	<b>U.S.C. § 853(p) (Criminal</b>
	:	<b>Forfeiture)</b>

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

On or about April 15, 2015, within the District of Columbia, **DOUGLAS HUGHES**, also known as Doug Hughes, knowingly and willfully served as an airman without an airman’s certificate authorizing him to serve in that capacity.

**(Operating as an Airman Without an Airman's Certificate,** in violation of Title 49, United States Code, Section 46306(b)(7))

**COUNT TWO**

On or about April 15, 2015, within the District of Columbia, **DOUGLAS HUGHES**, also known as Doug Hughes, owned an aircraft eligible for registration by the Federal Aviation Administration under 49 U.S.C. § 44102, and knowingly and willfully operated the aircraft when the aircraft was not registered under 49 U.S.C. § 44103.

**(Owning an Aircraft that is Knowingly Operated When the Aircraft is Not Registered,** in violation of Title 49, United States Code, Section 46306(b)(5)(A))

**COUNT THREE**

On or about April 15, 2015, within the District of Columbia and elsewhere, **DOUGLAS HUGHES**, also known as Dough Hughes, while piloting a gyrocopter, did knowingly and willfully, and without lawful authority, conduct flight operations in the restricted airspace known as the Washington, D.C., Metropolitan Area Special Flight Rules Area (DC SFRA) in violation of Title 14, Code of Federal Regulations, Section 93.331 *et seq.*, a regulation prescribed under 49 U.S.C. § 40103(b)(3).

**(Violation of National Defense Airspace,** in violation of Title 49, United States Code, Sections 46307 and 40103(b))

**COUNT FOUR**

On or about April 15, 2015, within the District of Columbia, **DOUGLAS HUGHES**, also known as Doug Hughes, while piloting a gyrocopter, did knowingly and willfully, and without lawful authority, conduct flight operations in restricted airspace known as the Washington, D.C., Metropolitan Area Flight Restricted Zone (DC FRZ) in violation of Title 14, Code of Federal Regulations, Section 93.331 *et seq.*, a regulation prescribed under 49 U.S.C. § 40103(b)(3).

**(Violation of National Defense Airspace**, in violation of Title 49, United States Code, Sections 46307 and 40103(b))

**COUNT FIVE**

On or about April 15, 2015, within the District of Columbia, **DOUGLAS HUGHES**, also known as Doug Hughes, while piloting a gyrocopter, did knowingly and willfully, and without lawful authority, conduct flight operations in the restricted airspace known as the Prohibited Area P-56 (P-56) in violation of Title 14, Code of Federal Regulations, Section 73.81 *et seq.*, 31 Federal Register 13422 (1966), as amended by 76 Federal Register 9501 (2011), a regulation prescribed under 49 U.S.C. § 40103(b)(3).

**(Violation of National Defense Airspace**, in violation of Title 49, United States Code, Sections 46307 and 40103(b))

**COUNT SIX**

On or about April 15, 2015, within the District of Columbia, **DOUGLAS HUGHES**, also known as Doug Hughes, knowingly and willfully operated and owned a vehicle and conveyance, and placed and attached words, letters, and characters on the vehicle and conveyance of like import to “United States Mail,” to wit, the logo and emblem of the United States Postal Service, when the vehicle and conveyance was not used to carry United States Mail.

**(Vehicle Falsely Labeled as Postal Carrier**, in violation of Title 18, United States Code, Section 1731)

**FORFEITURE ALLEGATION**

1. Upon conviction of the offenses alleged in Counts One and/or Two, the defendant shall forfeit to the United States any aircraft and property whose use related to the violations in those counts, pursuant to 49 U.S.C. § 46306(d)(1). The property subject to forfeiture includes the gyrocopter, and materials and items attached and related thereto, or found therein, that was

recovered on April 15, 2015, and which was flown to the West Front Lawn of the United States Capitol Building.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- 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;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

**(Criminal Forfeiture**, pursuant to Title 49, United States Code, Section 46306(d)(1), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p))

A TRUE BILL:

FOREPERSON.

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