

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b>
	:	
v.	:	<b>MAGISTRATE NO. 21-MJ-620</b>
	:	
<b>DARRELL NEELY,</b>	:	
	:	
<b>Defendant.</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 641</b>
	:	<b>(Theft of Government Property)</b>
	:	<b>18 U.S.C. § 1752(a)(1)</b>
	:	<b>(Entering and Remaining in a Restricted</b>
	:	<b>Building)</b>
	:	<b>18 U.S.C. § 1752(a)(2)</b>
	:	<b>(Disorderly and Disruptive Conduct in a</b>
	:	<b>Restricted Building)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(D)</b>
	:	<b>(Violent Entry and Disorderly Conduct in</b>
	:	<b>a Capitol Building)</b>
	:	<b>40 U.S.C. § 5104(e)(2)(G)</b>
	:	<b>(Parading, Demonstrating, or Picketing in</b>
	:	<b>a Capitol Building)</b>

**INFORMATION**

The United States Attorney charges that at all relevant times:

**COUNT ONE**

On or about January 6, 2021, within the District of Columbia, **DARRELL NEELY** did embezzle, steal, purloin, knowingly convert to his use and the use of another, and without authority, sold, conveyed and disposed of any record, voucher, money and thing of value of the United States and any department and agency thereof, that is, four china plates from the U.S. Capitol building and a U.S. Capitol Police jacket, badge, name tag, and baseball hat, which has a value of less than \$1000.

**(Theft of Government Property**, in violation of Title 18, United States Code, Section 641)

**COUNT TWO**

On or about January 6, 2021, in the District of Columbia, **DARRELL NEELY** 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,** in violation of Title 18, United States Code, Section 1752(a)(1))

**COUNT THREE**

On or about January 6, 2021, in the District of Columbia, **DARRELL NEELY** 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,** in violation of Title 18, United States Code, Section 1752(a)(2))

**COUNT FOUR**

On or about January 6, 2021, in the District of Columbia, **DARRELL NEELY** 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.

**(Violent Entry and Disorderly Conduct in a Capitol Building,** in violation of Title 40, United States Code, Section 5104(e)(2)(D))

**COUNT FIVE**

On or about January 6, 2021, in the District of Columbia, **DARRELL NEELY** 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,

CHANNING D. PHILLIPS  
Acting United States Attorney  
D.C. Bar No. 415793

By: /s/ Laura E. Hill  
LAURA E. HILL  
Trial Attorney, detailed to the  
District of Columbia  
NV Bar No. 13894  
175 N Street, NE, 9<sup>th</sup> Floor  
Washington, D.C. 20002  
(202) 598-3962  
Laura.E.Hill@usdoj.gov