

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	MAGISTRATE NO. 21-MJ-137
	:	
TOMMY FREDERICK ALLAN,	:	VIOLATIONS:
	:	18 U.S.C. § 641
Defendant.	:	(Theft of Government Property)
	:	18 U.S.C. § 1752(a)(1)
	:	(Entering and Remaining in a Restricted
	:	Building or Grounds)
	:	18 U.S.C. § 1752(a)(2)
	:	(Disorderly and Disruptive Conduct in a
	:	Restricted Building or Grounds)
	:	40 U.S.C. § 5104(e)(2)(A)
	:	(Entering and Remaining on the Floor of
	:	Congress)
	:	40 U.S.C. § 5104(e)(2)(D)
	:	(Disorderly Conduct in a Capitol Building)
	:	40 U.S.C. § 5104(e)(2)(G)
	:	(Parading, Demonstrating, or Picketing in
	:	a Capitol Building)

INFORMATION

The United States Attorney charges that:

COUNT ONE

On or about January 6, 2021, in the District of Columbia, **TOMMY FREDERICK ALLAN**, did steal, purloin, and 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, a United States flag, which has a value of less than \$1,000.

(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, **TOMMY FREDERICK ALLAN**, did steal, purloin, and 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, that is Government documents from the floor of the Senate Chamber, which have a value of less than \$1,000.

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

COUNT THREE

On or about January 6, 2021, in the District of Columbia, **TOMMY FREDERICK ALLAN**, did unlawfully and knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off, or 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.

(Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, Section 1752(a)(1))

COUNT FOUR

On or about January 6, 2021, in the District of Columbia, **TOMMY FREDERICK ALLAN**, did knowingly, and with intent to impede and disrupt the orderly conduct of Government business and official functions, engage in disorderly and disruptive conduct in and within such proximity to, a restricted building and grounds, that is, any posted, cordoned-off, or otherwise restricted area within the United States Capitol and its grounds, where the Vice President and Vice

President-elect were temporarily visiting, 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 FIVE

On or about January 6, 2021, in the District of Columbia, **TOMMY FREDERICK ALLAN**, willfully and knowingly entered and remained on the floor of a House of Congress, without authorization to do so.

(Entering and Remaining on the Floor of Congress, in violation of Title 40, United States Code, Section 5104(e)(2)(A))

COUNT SIX

On or about January 6, 2021, in the District of Columbia, **TOMMY FREDERICK ALLAN**, 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 and either House of Congress, and the orderly conduct in that building of a hearing before or any deliberation of, a committee of Congress or either House of Congress.

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

COUNT SEVEN

On or about January 6, 2021, in the District of Columbia, **TOMMY FREDERICK ALLAN**, willfully and knowingly paraded, demonstrated, and picketed in any United States 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,

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By: /s/
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