

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

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|---------------------------------|---|--|
| UNITED STATES OF AMERICA | : | CRIMINAL NO. |
| | : | |
| v. | : | |
| | : | |
| SHELLY VARNEY, | : | 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) |
| | : | |

INFORMATION

The United States Attorney charges that:

COUNT ONE

On or about January 6, 2021, within the District of Columbia, **SHELLY VARNEY**, did embezzle, steal, purloin, knowingly convert to her 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 and flagpole, which have 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, within the District of Columbia, **SHELLY VARNEY**, did knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off, and otherwise restricted area within the United States Capitol and its grounds, where the Vice

President was and would be temporarily visiting, without lawful authority to do so.

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

Respectfully submitted,

MATTHEW M. GRAVES
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DC Bar No. 481052

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