

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No.: 21-cr-312-JEB
	:	
v.	:	
	:	
ELIZABETH ROSE WILLIAMS,	:	
	:	
Defendant.	:	

NOTICE OF FILING DISCOVERY CORRESPONDENCE

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, files its May 17, 2021, discovery letter, memorializing discovery sent on this same day, which is served as an attachment via ECF on counsel for Defendant.

Respectfully submitted,

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

By: *s/ Monica A. Stump*
MONICA A. STUMP
PA Bar No. 90168
Assistant United States Attorney
District of Columbia
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U.S. Department of Justice

CHANNING D. PHILLIPS
Acting United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530*

May 17, 2021

VIA EMAIL

Roy Barrera, Jr.
The Barrera Firm
424 East Nueva
San Antonio, TX 78205
rbarrerajr@ymail.com

Re: *United States v. Elizabeth Rose Williams*
Case No. 21-cr-312-JEB
Discovery Letter No. 1

Dear Mr. Barrera:

This is to memorialize the following preliminary discovery sent you via USAfx **on May 6, 2021, May 7, 2021, May 10, 2021, May 11, 2021, May 12, 2021, and May 13, 2021**, containing the following materials:

Under File 3377831:

Serial 1_1A_01: Photograph of Bennett
Serial FISUR 1 (SENSITIVE): Surveillance request
Serial 2: Background information and social media information for Bennett
Serial 2_1782_01-04: Facebook screenshots from Bennett's Facebook accounts
Serial 5 and 1A_03-01 and 03_02: Facebook preservation request documents for Bennett
Serial FISUR 6: Surveillance request
Serial 7 and 1A_05_01 and 05_02: Twitter preservation request documents for Bennett
Serial FISUR 7 and 1A_06_01: Surveillance report and log for March 10, 2021
Serial 08_1A_06_01: Screenshot of Bennett
Serial FISUR 8 and 1A_07_01: Surveillance report and log for March 9, 2021
Serial 9 and 1A_08_02, 08_04 through 05, and 08_08: Tip report for Bennett and Williams and photographs and screenshots of Bennett and Williams
Serial FISUR 9 and 1A_08_01: Surveillance report and log for March 8, 2021
Serial 10 and 1A_09_01: Bennett's Facebook posting claiming Capitol Riot was a revolutionary message with screenshots

Serial FISUR 10 and 1A_09_01: Surveillance report and log for March 11, 2021
Serial 12 and 1A_02_01: Podcast interview of Bennett including audio
Serial 13 and 1A_02_01: Tipster video of Bennett and Williams at and inside the Capitol
Serial 14 and 1A_04_01 through 03, 04_05 and 04_06, 05_01 to 05_07: Identification of Williams, photographs and video stills of Williams and Bennett from Facebook and Instagram, Williams driver's license photograph, clear records, tip video, Bennett's profile picture on Facebook
Serial 15: Liaison with Kerr County
Serial 16_1A_06_01 through _08, 1A_07_01 though 07_04, and 08_01: Message for identification, tip video, stills from tip video, text message, Williams contact screenshot, Bennett contact screenshot, Williams photograph at Lincoln Memorial, KCSO report
Serial 17 and 1A_04_01 and 02 (HIGHLY SENSITIVE): Surveillance footage inside the Capitol, two still images
Serial 18_1A_09_02 to 09_07 and 10_01 to _03: Still images of Bennett and Williams inside the Capitol, Williams' and Bennett's drivers' license photographs, and Bennett's temporary driver's license.
Serial 21 (HIGHLY SENSITIVE): Recognition Search Report
Serial 22: Public tip review
Serial 23 (SENSITIVE): Recognition Search Report
Serial 25 and 1A_013_01: Fugitive Letter and Arrest Warrant for Bennett
Serial 26: Late Submission Notification
Serial 28 and 1A_015_01: Enterprise Rent-A-Car information and Screenshot
Serial 29 and 1A_16_01 through _03: Battle Born Blog information and three screenshots
Serial 31 and 1A_08_01: Search warrant execution at Williams' residence
Serial 32 and 1A_18_01 through _02: Search warrant materials for Facebook
Serial 40 and 1A_25_01: Facebook return and image activity in DC on January 6, 2021
Serial 41 (HIGHLY SENSITIVE): Recognition and Cell Phone Reports
Serial 42 (HIGHLY SENSITIVE) and 1A_01_02 and 01_04 and 05: MPD tip and Twitter profile pictures
Serial 43 and 1A_27_01: Arrest warrant package
Serial 44: Search warrant for Williams' residence

Under File 3378336:

Serial 1_1A_01_01: Williams' Identification number
Serial 1_1A_01_04 through 06: Driver's license photograph, firearm search and driver's license photograph
Serial FISUR 1 and 1A_01_01: Surveillance request and accident form
Serial 2 (HIGHLY SENSITIVE): Tip documentation
Serial 3 and 1A_02_01: Video of Williams inside the U.S. Capitol and Tip video
Serial FISUR 3 and 1A_05_01 through 08: Surveillance report, log, and pictures for January 27, 2021
Serial 4 and 1A_04_01 through 04_06, and 05_01 through 05_07: Identification of Williams, Tip video, Facebook and Instagram pictures of Williams and Bennett, Driver's license

photograph, Clear Report, Bennett's profile picture, and Still picture of Williams inside the U.S. Capitol

Serial FISUR 4 and 1A_02_01: Surveillance report and log for January 25, 2021

Serial 5 and 1A_03_01 through 05: Database search results, Driver's license photograph, Firearm search, Williams' Identification number, Criminal History, and Facebook Video of Bennett and Williams

Serial FISUR 5, 1A_03_01, and 1A_04_01 through 10: Surveillance report, log, and pictures for January 28, 2021

Serial FISUR 6 and 1A_09_01: Surveillance report and log for March 11, 2021

Serial 7: KCSO liaison

Serial FISUR 7, 1A_01_01, 1A_02_01 and 02, 1A_03_01, 1A_04_01, 1A_05_01, 1A_06_01 and 02: Surveillance report, log, and pictures for March 12, 2021

Serial 08_1A_06_01 through _08, 1A_07_01 through 07_04, and 08_01: Message for identification, tip video, stills from tip video, text message, Williams contact screenshot, Bennett contact screenshot, Williams photograph at Lincoln Memorial, KCSO report

Serial 9 and 1A_04_01 and 02 (HIGHLY SENSITIVE): Surveillance footage inside the Capitol, two still images

Serial 10_1A_09_01 to 09_07 and 10_01 to _03: Tip video, Still images of Bennett and Williams inside the Capitol, Williams' and Bennett's drivers' license photographs, and Bennett's temporary driver's license.

Serial 11 and 1A_04_01 through 08: E. Dean information and pictures

Serial 13 and 1A_05_01: Fugitive Letter and Arrest Warrant for Williams

Serial 14: Late Submission Notification

Serial 15: Search warrant at Williams' residence

Serial 17 and 1A_015_01: Enterprise Rent-A-Car information and Screenshot

Serial 19 and 1A_07_01 through 04: Arrest and transportation documents (Williams)

Serial 20: Report acknowledging CD (Williams)

Serial 21 and 1A_08_01: Search warrant execution at Williams' residence

Serial 22 and 1A_09_01 through 09_05: Entry of wanted person, Criminal history report, Driver's license photograph, Williams' arrest warrant

Serial 23 and 1A_10_01 and 10_04: Williams' warrant information and Criminal History report

Serial 24 and 1A_11_01 through _02: Search warrant for historical cell site location information for Williams

Serial 25 (HIGHLY SENSITIVE): Recognition Search Report

Serial 26 (SENSITIVE) and 1A_01_01 through _04: File opening, Tip video, Bennett's twitter profile, tipster information

Serial 27 and 1A_09_01: Bennett's Facebook posting claiming Capitol Riot was a revolutionary message with screenshots

Serial 29 and 1A_08_02, 08_04 to 08_05, and 08_08: Tip report for Bennett and Williams and photographs and screenshots of Bennett and Williams

Serial 30 and 1A_02_01: Williams' Clear Report

Serial 31 and 1A_03_01: Williams' Prosecution submission and subject report

Serial 32 and 1A_27_01: Williams' Arrest Warrant and complaint documents

Serial 33: Search warrant for Williams' residence
Serial 34 and 1A_12_01 through 02: Williams' Verizon search warrant materials

Bennett Facebook Photo with comments
Bennett Facebook Photos
Bennett Facebook
Bennett Facebook posts
Bennett Facebook 2
Bennett Facebook Screenshot
Bennett Facebook posts2
Bennett Facebook Photo with date
Battleborn Screenshots numbered 1 through 3
Tip video.mp4

Due to the extraordinary nature of the January 6, 2021 Capitol Attack, the government anticipates that a large volume of materials may contain information relevant to this prosecution. These materials may include, but are not limited to, surveillance video, statements of similarly situated defendants, forensic searches of electronic devices and social media accounts of similarly situated defendants, and citizen tips. The government is working to develop a system that will facilitate access to these materials. In the meantime, please let me know if there are any categories of information that you believe are particularly relevant to your client.

The discovery is unencrypted. Please contact me if you have any issues accessing the information, and to confer regarding pretrial discovery as provided in Fed. R. Crim. P. 16.1.

This material is subject to the terms of the Protective Order issued in this case.

I recognize the government's discovery obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), its progeny, and Rule 16. I will provide timely disclosure if any such material comes to light. Consistent with *Giglio*, *Ruiz*, and 18 U.S.C. § 3500, I will provide information about government witnesses prior to trial and in compliance with the court's trial management order.

I request reciprocal discovery to the fullest extent provided by Rule 16 of the Federal Rules of Criminal Procedure, including results or reports of any physical or mental examinations, or scientific tests or experiments, and any expert witness summaries. I also request that defendant(s) disclose prior statements of any witnesses defendant(s) intends to call to testify at any hearing or trial. *See* Fed. R. Crim. P. 26.2; *United States v. Nobles*, 422 U.S. 255 (1975). I request that such material be provided on the same basis upon which the government will provide defendant(s) with materials relating to government witnesses.

Additionally, pursuant to Federal Rules of Criminal Procedure 12.1, 12.2, and 12.3, I request that defendant(s) provide the government with the appropriate written notice if defendant(s) plans to use one of the defenses referenced in those rules. Please provide any notice

within the time period required by the Rules or allowed by the Court for the filing of any pretrial motions.

I will forward additional discovery as it becomes available. If you have any questions, please feel free to contact me.

Sincerely,

/s/ Monica A. Stump

Monica A. Stump
Assistant United States Attorney

Enclosure(s)