

**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 July 12, 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
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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*

July 12, 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. 2

Dear Mr. Barrera:

This is to memorialize the following preliminary discovery sent you via USAfx on **May 18, 2021, June 8, 2021, June 9, 2021, July 3, 2021, July 5, 2021, July 6, 2021, July 8, 2021, and July 9, 2021**, containing the following materials:

Getty Images of Williams and Bennett in Senate Gallery and near East Rotunda Door:
1294949271-612x612, 1294932412-612x612, 1294932412-2048x2048, 1294949455-
612x612, 1294930539-2048x2048

Two Images of Williams holding cell phone outside U.S. Capitol

Two Images of Williams and Bennett inside the Capitol

Image of Williams inside the Capitol

Video from C. M. cell phone IMG_0671 SENSITIVE

New Yorker video information for A Reporter's Video from Inside the Capitol Siege (74 files)

C.S. SW file ending X56e071eeac SENSITIVE

Security Footage (5 videos) and 2 Still images from the Memorial Door, Rotunda, and East Rotunda door HIGHLY SENSITIVE

RMG News long – Inside the 2021 Storming of the US Capitol video file

Under File 3377831:

Facebook returns
Serial 1: Opening report
Serials 3 and 8 Redacted: Tipster report
Serial 09_1A_08_01, 09_1A_08_03 and 1A_08_06: Redacted SENSITIVE: Bennett and Williams search
Serial 10_1A_09_02 Redacted SENSITIVE: Bennett and Williams search

Under File 3378336:

Search warrant photographs (121 photographs)
Williams 1A17-Imaged Cell Phone Results Jan 2021
Serial 26_1A_01_03 SENSITIVE: Bennett and Williams search
Serial 29_1A_08_01, 29_1A_08_03, and 29_1A_08_06 Redacted SENSITIVE: Bennett and Williams search
Serial 33_1A_028_01 HIGHLY SENSITIVE: Search warrant documents for Williams' residence
Serial 35 and 1A-13_01: Report on indictment and indictment
Serial 43 HIGHLY SENSITIVE: Report on video footage inside the U.S. Capitol
Serial 47: Report on Cell phone imaging

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)