

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

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**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 23, 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*

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

July 23, 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. 3

Dear Mr. Barrera:

This is to memorialize the following preliminary discovery sent you via USAfx on **July 23, 2021**:

**Under File 3377831:**

Serial 2\_1A\_01782\_01 redacted: Facebook page information Bennett  
Serial 3\_1A\_01583\_01 redacted: Email with screenshots and link to Bennett  
Serial 8\_1A\_07\_01 redacted: Interview notes tipster  
Serial 9\_1A\_08\_07 redacted: Tipster report  
Serial 11 and 11\_1A\_10\_01 redacted: Tipster report and notes  
Serial 16 and 18 redacted: Identification reports of Bennett  
Serial 20 and 20\_1A\_11\_01 physical redacted: Report of interview and notes  
Serial 21\_1A\_11\_01 redacted: Image report  
Serial 22\_1A\_12\_01 redacted: Image report  
Serial 23\_1A\_12\_01 redacted: Image report  
Serial 27 and 27\_1A\_14\_01 redacted: Interview report and notes  
Serial 36 redacted: Communication report with Bennett  
Serial 41\_1A\_26\_02, 04, and 05 redacted: Image search of Bennett and Williams

**Under File 3378336:**

Serial 1\_1A\_02, 03 and 07 redacted: Tipster reports  
Serial 2\_1A\_4428\_01 redacted: Image search  
Serial 8 redacted: Identification of Bennett  
Serial 10 redacted: Report of interview of witness identifying Bennett  
Serial 16 and 16\_1A\_14\_01 redacted: Report of interview and notes  
Serial 25\_1A\_26\_02, 04, and 05 redacted: Reports of Image search Williams and Bennett  
Serial 26\_1A\_01\_04 redacted: Tipster report  
Serial 27\_1A\_09\_02 redacted: Image search Bennett  
Serial 28 and 28\_1A\_10\_01 redacted: Interview of tipster and notes  
Serial 29\_1A\_08\_07 redacted: Tipster report  
Serial 38 and 38\_1A\_14\_01: Image search reports

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)