

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

UNITED STATES OF AMERICA :

v.

:

1:21-cr-00056

:

WILLIAM VOGEL

:

NOTICE OF FILING

Undersigned counsel, on behalf of William Vogel, respectfully submits the attached for filing in the docket.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

_____/s/_____
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April 27, 2021

Jeffrey Poulin
Assistant United States Attorney
555 Fourth St. NW
Washington D.C. 20053
Re: United States v. William Vogel, 21-cr-56

Dear Mr. Poulin:

I am writing you to request a Bill of Particulars as to Counts One, Two and Three in the Information, filed January 27, 2021. A bill of particulars serves to provide a defendant with essential details of the charges against him to ensure that he is adequately “informed of the nature and cause of the accusation” under the Sixth Amendment and can be prepared to meet the charges and avoid surprise. *See Russel v. United States*, 369 U.S. 749, 763 (1962).

In Counts One and Two, you charge Mr. Vogel with Entering and Remaining in a Restricted Building (Count One) and Disorderly and Disruptive Conduct in a Restricted Building (Count Two) in a restricted area where the Vice President and Vice President-elect were temporarily visiting. Please indicate the nature of the disorderly and disruptive conduct that you are alleging that Mr. Vogel engaged in. Please also provide the times that the Vice President and Vice President-elect were temporarily visiting and the times that you allege that Mr. Vogel was on Capitol grounds.

In Count Three, you charge Mr. Vogel with Violent Entry and Disorderly Conduct in a Capitol Building. Please indicate the nature of the disorderly and disruptive conduct. Please also provide the facts underlying your allegation that Mr. Vogel intended to impede, disrupt and disturb the orderly conduct of a session of Congress. In doing so, please provide the relevant times that Congress was in session on January 6th as well as the times that Mr. Vogel was engaged in this conduct.

I would appreciate a timely response so that I may file a Motion with the Court under Federal Rule of Criminal Procedure 7(f) if you decline to provide a Bill of Particulars.

Please let me know if you have any questions.

Best,

A handwritten signature in black ink, appearing to be 'E. Ohm', written in a cursive style.

Eugene Ohm
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