

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

RILEY JUNE WILLIAMS

No. 1:21-cr-618 (ABJ)

**GOVERNMENT’S REVISED PROPOSED JURY INSTRUCTIONS**  
**FOR COUNTS FIVE AND SIX**

In response to the defendant’s indication that she intends to argue that she should be acquitted of Counts Five and Six because the Vice President was not “temporarily visiting” the U.S. Capitol on January 6, 2021, the United States submits the attached (revised) proposed jury instructions for Counts Five and Six, which charge the defendant with violating 18 U.S.C. §§ 1752(a)(1) (entering and remaining in a restricted building or grounds) and 1752(a)(2)(disorderly and disruptive conduct in a restricted building or grounds), respectively.

The revised proposed instructions build on the government’s previous proposed instructions, *see* ECF 92-2, by adding language defining the phrase “temporarily visiting.” That new language is adapted from the Court’s Memorandum Opinion of June 22, 2022, in which the Court denied the defendant’s motion to dismiss Counts Five and Six based on similar arguments concerning the status of the Vice President. *See* ECF 55; *see also* ECF 37, 40.

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**Count Five**  
**Entering and Remaining in a Restricted Building or Grounds**  
**(Violation of 18 U.S.C. § 1752(a)(1))**

Count Five of the Indictment charges the defendant with entering or remaining in a restricted building or grounds, which is a violation of federal law.

**Elements**

In order to find the defendant guilty of this offense, you must find that the government proved each of the following elements beyond a reasonable doubt:

*First:* that the defendant entered or remained in a restricted building or grounds without lawful authority to do so.

*Second:* that the defendant did so knowingly.

**Definitions**

The term “restricted building or grounds” means any posted, cordoned off, or otherwise restricted area of a building or grounds where a person protected by the Secret Service is or will be temporarily visiting.<sup>1</sup>

The phrase “temporarily visiting” means being somewhere for a limited period of time, including being there for a business purpose. A person may temporarily visit a place where he or she has an office.<sup>2</sup>

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<sup>1</sup> 18 U.S.C. § 1752(c)(1). *See also United States v. Robertson*, No. 21-cr-34 (CRC) (ECF 86 at 20); *United States v. Thompson*, No. 21-cr-161 (RBW) (ECF 83 at 31); *United States v. Hale-Cusanelli*, No. 21-cr-37 (TNM) (ECF 84 at 32); *United States v. Webster*, No. 21-cr-208 (APM) (ECF 101 at 19); *United States v. Williams*, No. 21-cr-377 (BAH) (ECF 112 at 8).

<sup>2</sup> Adapted from ECF No. 55 at 41-42.

The term “person protected by the Secret Service” includes the Vice President and the immediate family of the Vice President.<sup>3</sup>

The term “knowingly” has the same meaning described in the instructions for Count One.

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<sup>3</sup> 18 U.S.C. §§ 1752(c)(2), 3056.

**Count Six**  
**Disorderly Conduct in a Restricted Building or Grounds**  
**(Violation of 18 U.S.C. § 1752(a)(2))**

Count Six of the indictment charges the defendant with disorderly or disruptive conduct in a restricted building or grounds, which is a violation of federal law.

**Elements**

In order to find the defendant guilty of this offense, you must find that the government proved each of the following elements beyond a reasonable doubt:

- First:* that the defendant engaged in disorderly or disruptive conduct in, or in proximity to, any restricted building or grounds.
- Second:* that the defendant did so knowingly, and with the intent to impede or disrupt the orderly conduct of Government business or official functions.
- Third:* that the defendant’s conduct occurred when, or so that, her conduct in fact impeded or disrupted the orderly conduct of Government business or official functions.

**Definitions**

“Disorderly conduct” occurs when a person is unreasonably loud and disruptive under the circumstances, or interferes with another person by jostling against or unnecessarily crowding that person. “Disruptive conduct” is a disturbance that interrupts an event, activity, or the normal course of a process.<sup>4</sup>

The term “restricted building or grounds” has the same meanings as described in the instructions for Count Five.

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<sup>4</sup> *United States v. Robertson*, No. 21-cr-34 (CRC) (ECF 86 at 23); *United States v. Hale-Cusanelli*, No. 21-cr-37 (TNM) (ECF 84 at 34); *United States v. Webster*, No. 21-cr-208 (APM) (ECF 101 at 21); *United States v. Williams*, No. 21-cr-377 (BAH) (ECF 112 at 10).

The phrase “temporarily visiting” has the same meanings as described in the instructions for Count Five.

The term “person protected by the Secret Service” has the same meanings as described in the instructions for Count Five.

The term “knowingly” has the same meaning described in the instructions for Count One