

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

**UNITED STATES OF AMERICA :**

**v.**

**:**

**1:21-cr-00248**

**:**

**AARON MILEUR**

**:**

**NOTICE OF FILING**

Undersigned counsel, on behalf of Aaron Mileur, respectfully submits the attached  
for filing in the docket.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

\_\_\_\_\_/s/\_\_\_\_\_  
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**FEDERAL PUBLIC DEFENDER**  
**DISTRICT OF DISTRICT COLUMBIA**

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**April 27, 2021**

Adam Alexander  
Assistant United States Attorney  
555 Fourth St. NW  
Washington D.C. 20053

Re: United States v. Aaron Mileur, 21-cr-00248

Dear Mr. Alexander:

I am writing you to request a Bill of Particulars as to Counts One, Two and Three in the Information, filed March 24, 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. Mileur 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. Mileur 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. Mileur was on Capitol grounds.

In Count Three, you charge Mr. Mileur 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. Mileur 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 6<sup>th</sup> as well as the times that Mr. Mileur 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 'EO' with a stylized flourish.

Eugene Ohm  
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