

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

UNITED STATES OF AMERICA

v.

RILEY JUNE WILLIAMS,

Defendant.

Crim. Action No. 21-618 (ABJ)

**NOTICE OF RECENT AUTHORITY RELEVANT TO MS. WILLIAMS’  
MOTION TO DISMISS COUNT TWO OF THE INDICTMENT**

Riley June Williams, by and through undersigned counsel, respectfully files this notice to alert the Court and counsel of a recent decision in this District relevant to Ms. Williams’ Motion to Dismiss Count Two of the Indictment. ECF. No. 33. In *United States v. Miller*, 1:21-cr-119-CJN, Judge Nichols granted the defendant’s motion to dismiss the charge in the indictment brought under 18 U.S.C. § 1512(c). Specifically, Judge Nichols considered whether the conduct that January 6th defendants have been accused of committing qualifies as conduct that “otherwise obstructs, influences, or impedes” an official proceeding, within the meaning of Section 1512(c)(2). Memorandum Opinion, ECF. No. 72, *United States v. Miller*,

1:21CR-119-CJN (hereafter “Miller mem. op.”).<sup>1</sup> Judge Nichols held that the conduct alleged does not qualify, concluding that “§1512(c)(2) must be interpreted as limited by subsection (c)(1), and thus requires that the defendant have taken some action with respect to a document, record, or other object in order to corruptly obstruct, impede or influence an official proceeding.” *Miller* mem. op. at 28. Finding that Miller was not alleged to have taken such action, Judge Nichols dismissed the obstruction count for failing to allege a violation of 18 U.S.C. 1512 (c)(2). Likewise, in Count Two of her Indictment, Ms. Williams is not alleged to have taken any action with respect to a document, record, or other object in order to corruptly obstruct, impede or influence an official proceeding.

Ms. Williams respectfully submits that this Court should adopt the reasoning applied by Judge Nichols in *United States v. Miller* and dismiss Count Two of her Indictment.

Date: March 14, 2022

Respectfully submitted:

/s/ Lori J. Ulrich

LORI J. ULRICH, ESQUIRE  
Assistant Federal Public Defender

/s/ Amanda R. Gaynor

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<sup>1</sup> Judge Nichols’s opinion is attached hereto as Ex. 1.

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**CERTIFICATE OF SERVICE**

I, Lori J. Ulrich, Esquire, of the Federal Public Defender's Office, do hereby certify that I served a copy of the foregoing **Notice of Additional Authority Supporting Ms. Williams' Motion to Dismiss Count Two of the Indictment** via Electronic Case Filing, and/or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, and/or by hand delivery, addressed to the following:

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RILEY JUNE WILLIAMS

Date: March 14, 2022

*/s/ Lori J. Ulrich*  
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