

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Criminal No. 1:21-CR-00618
	:	
v.	:	(Judge Berman Jackson)
	:	
RILEY JUNE WILLIAMS	:	(Electronically Filed)

MOTION TO AMEND CONDITIONS OF RELEASE

AND NOW comes the Defendant, Riley June Williams, by her attorneys, Lori J. Ulrich, Trial Chief, Assistant Federal Public Defender, and A.J. Kramer, Federal Public Defender, and files the following Motion to Amend Conditions of Release. In support thereof, it is averred as follows:

1. By criminal complaint filed January 17, 2021, Riley June Williams was charged with knowingly entering or remaining in any restricted building or grounds without lawful authority, in violation of 18 U.S.C. § 1752(a)(1) and violent entry and disorderly conduct on Capitol grounds, in violation of 40 U.S.C. § 5104(e)(2).
2. On January 19, 2021, an amended criminal complaint was filed adding the additional charges of aiding and abetting others to, embezzle, steal, purloin, in violation of 18 U.S.C §§ 641, 2, and obstructing, influencing, or impeding any official proceeding, in violation of 18 U.S.C. § 1512(c)(2).

3. On January 21, 2021, a corrected amended criminal complaint was filed adding the charge of knowingly entering or remaining in any restricted building or grounds without lawful entry, in violation of 18 U.S.C.1752(a)(2).

4. On January 27, 2021, following two days of hearings before United States Magistrate Judge Zia M. Faruqui, Ms. Williams was released with conditions. Among these conditions, Ms. Williams was placed on location monitoring and home detention. Ms. Williams is restricted to her residence at all times, except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer. *See* Doc. 29, Order Setting Conditions of Release.

5. On October 6, 2021, a grand jury returned an indictment against Ms. Williams, charging her with civil disorder, in violation of 18 U.S.C. § 231(a)(3) (Count 1); obstruction of an official proceeding, in violation of 18 U.S.C. §§ 1512(c)(2) and 2 (Count 2); assaulting, resisting, or impeding certain officers, in violation of 18 U.S.C. § 111(a)(1) (Count 3); theft of government property, in violation of 18 U.S.C. § 641 and 2 (Count 4); entering and remaining in a restricted building or grounds, in violation of 18 U.S.C. § 1752(a)(1) (Count 5); disorderly and disruptive conduct in a restricting building or grounds, in violation of 18 U.S.C. § 1752(a)(2) (Count 6); disorderly conduct in a Capitol building, in

violation of 40 U.S.C. § 5104(e)(2)(D) (Count 7); and parading, demonstrating or picketing in a Capitol building, in violation of 40 U.S.C. § 5104(e)(2)(G) (Count 8). (Doc. 27, Indictment).

6. On October 18, 2021, Ms. Williams appeared, via videolink, before this Honorable Court and entered a plea of not guilty to the Indictment. At the arraignment, the Court ordered that Ms. Williams' previous conditions of release would remain in place.

7. Ms. Williams has been on home detention since January 21, 2021, over sixteen (16) months.

8. Ms. Williams has been in compliance with her conditions of pretrial release during this period and has had no documented violations. *See* Pretrial Compliance Reports (Docs. 22, 26, 30 and 44).

9. Ms. Williams currently resides with her mother and third-party custodian, Wendy Williams.

10. Ms. Williams is currently employed full-time at a nursery in the Middle District of Pennsylvania.

11. Ms. Williams currently participates in mental health counseling and has become a member of a local Baptist church.

12. Ms. Williams now moves this Court to amend her conditions of release. Specifically, Ms. Williams requests that the Court remove the condition of home

detention and location monitoring from her conditions of release as they are unduly burdensome and overly restrictive.

13. Assistant United States Attorneys Maria Y. Fedor and Joseph Hong Huynh, Esquire oppose this request.

WHEREFORE, the defendant, Riley June Williams, respectfully requests that this Honorable Court grant the Motion to Amend Conditions of Release and remove home detention and location monitoring as a condition of Ms. Williams' pretrial release.

Date: May 27, 2022

Respectfully submitted,

/s/ Lori J. Ulrich

LORI J. ULRICH, ESQUIRE

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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 **Motion to Amend Conditions of Release** 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: May 27, 2022

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ORDER

AND NOW this _____ day of _____, 2022, after consideration of the Motion to Amend Conditions of Release, **IT IS HEREBY ORDERED** that the Motion is **GRANTED**. The conditions of home confinement and electronic location monitoring are removed from Ms. Williams' conditions of pretrial release. All other conditions of release shall remain in full force and effect.

BY THE COURT

AMY BERMAN JACKSON
United States District Judge