

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

**UNITED STATES OF AMERICA** :

:

**v.** :

:

**KEVIN JAMES LYONS,** :

:

**Defendant.** :

**Criminal No.: 21-CR-79-BAH**

**MOTION TO COMPELL**

Now comes the Defendant, Kevin Lyons, by his attorney, Lawrence Wolf Levin, and moves this court for an order on the United States of America to comply with previous requests relative to particular discovery, and also to allow inspection of Speaker Nancy Pelosi's office regarding certain events which were alleged to have happened on or about January 6, 2021. In support thereof, Defendant states as follows:

1. That defendant, Kevin Lyons, is charged with particular crimes against the United States, with particularity as to Obstruction of an Official Proceeding, and Aiding and Abetting in violation of 18 U.S.C. §1512(c)(2), by Indictment with violations of 18 U.S.C. § 1752(a) and 40 U.S.C. § 5104(e)(2)(C) and (D), related to crimes that occurred at the United States Capitol on January 6, 2021.
2. That Defendant has asked for certain discovery in this particular matter relative to items seized by agents of the United States; to and including videos, still photographs, documentary evidence, and other information relative to the events in question.
3. That Defendant is further requesting inspection of the Speaker's Office and Chambers, relative to certain events which are alleged in the Indictment against Kevin Lyons.

4. To date, despite repeated requests of the “differing United States Attorneys”, there remains substantial out standing discovery and “no response” relative to an inspection of the Speaker’s Chambers and office.
5. That said request is based on the necessity of full and completed discovery, and is necessitated by the charges against Mr. Lyons, and the ability of counsel to properly prepare for possible trial in this matter, and/or in the alternative, a subsequent plea.
6. That this request is not being done to castigate any United States Attorney, but simply to bring about the requested information and inspection as stated above.

WHEREFORE, Defendant, Kevin Lyons, through counsel, moves this Court to for an Order upon the United States of America to comply with the previous—repeated requests—for particular discovery as stated above, and also the request for inspection of the Speaker’s Chambers.

Respectfully submitted,

/s/Lawrence Wolf Levin  
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