

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 MODIFY 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 Modify 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).

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). *See* (Doc. 27).

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. On May 27, 2022, Ms. Williams filed a motion to amend the conditions of release asking this Court to remove the condition of home detention and location monitoring. *See* (Doc. 51).

9. Ms. Williams has argued that she is in compliance with the conditions of release. *Id.* at 3.

10. Indeed, 5 pretrial compliance reports have been filed noting no violations. *See* (Docs. 11, 22, 26, 30, and 44).

11. On June 10, 2022, the government filed its brief in opposition. *See* (Doc. 52). Despite the lack of any violation reports, the government argues that she has in fact violated the conditions of her release. *Id.* at pgs. 7-9.

12. On June 16, 2022, Ms. Williams filed her reply arguing that she has not violated the conditions of release, and any alleged violations are *de minimus*.

13. The motion to amend the conditions of release remains pending.

14. Ms. Williams respectfully requests that she be allowed to attend Yoga Love Festival at 44 Buffalo Creek, Duncannon, Pennsylvania on Saturday, June 25, 2022 from 3:00 p.m. until 9:00 p.m.

15. Assistant United States Attorneys Maria Y. Fedor and Joseph Hong Huynh, Esquire were contacted, and undersigned counsel has not received a response with their position on this instant request.

WHEREFORE, the defendant, Riley June Williams, respectfully requests that this Honorable Court grant the Motion to Modify Conditions of Release.

Date: June 23, 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 Modify 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: June 23, 2022

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