

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 attorney, Lori J. Ulrich, Trial Chief, Assistant 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 remain in place.

7. Ms. Williams has been on home detention since January 21, 2021.

8. Ms. Williams respectfully requests that she be allowed to attend The Pennsylvania Renaissance Faire at 2775 Lebanon Road, Manheim, Pennsylvania on Saturday, September 17, 2022 from 10:00 a.m. until 10:00 p.m.

9. Assistant United States Attorneys Samuel S. Dalke, Esquire concurs in this request.

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

Date: September 13, 2022

Respectfully submitted,

/s/ Lori J. Ulrich

LORI J. ULRICH, ESQUIRE
Assistant Federal Public Defender
Attorney ID #55626
100 Chestnut Street, Suite 306
Harrisburg, PA 17101
Tel. No. (717) 782-2237
Fax No. (717) 782-3881
lori_ulrich@fd.org
Attorney for Riley June Williams

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:

SAMUEL S. DALKE, ESQUIRE
Assistant United States Attorney
Samuel.s.dalke@usdoj.gov

MICHAEL GORDON, ESQUIRE
Assistant United States Attorney
Michael.gordon3@usdoj.gov

MASHARIA HOLMAN
United States Probation
masharia.holman@psa.gov

MICHAEL YASENCHAK
United States Probation
Michael_Yasenchak@pamp.uscourts.gov

RILEY JUNE WILLIAMS

Date: September 13, 2022

/s/ Lori J. Ulrich
LORI J. ULRICH, ESQUIRE
Assistant Federal Public Defender
Attorney ID #55626
100 Chestnut Street, Suite 306
Harrisburg, PA 17101
Tel. No. (717) 782-2237
Fax No. (717) 782-3881
lori_ulrich@fd.org
Attorney for Riley June Williams