

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

UNITED STATES OF AMERICA :

v.

1:21-cr-287

KEVIN SEEFRIED

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:

NOTICE OF FILING

Undersigned counsel, on behalf of Kevin Seefried, respectfully submits the attached for filing in the docket.

Respectfully submitted,
A.J. KRAMER
FEDERAL PUBLIC DEFENDER

_____/s/_____
EUGENE OHM
Assistant Federal Public Defender
625 Indiana Ave., NW
Suite 550
Washington, DC 20004
(202) 208-7500
eugene_ohm@fd.org

FEDERAL PUBLIC DEFENDER

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA:: v. 1:21-cr-287: KEVIN SEEFRIED: NOTICE OF FILING Undersigned counsel, on behalf of Kevin Seefried, respectfully submits the attached for filing in the docket. Respectfully submitted: A.J. KRAMER FEDERAL PUBLIC DEFENDER /s/ EUGENE OHM Assistant Federal Public Defender 625 Indiana Ave., NW Suite 550 Washington, DC 20004 (202) 208-7500 eugene_ohm@fd.org FEDERAL PUBLIC DEFENDER DISTRICT OF DISTRICT COLUMBIA 625 Indiana Ave. NW. Washington, DC 20004 (202) 208-7528 FAX (202) 208-7515

625 Indiana Ave. NW Washington, DC 20004 (202) 208-7528 FAX (202) 208-7515
Brittany Reed Assistant United States Attorney, Eastern District of Louisiana 650 Poydras St. New Orleans, LA 70130 Re: United States v. Kevin Seefried, 21-cr-287 Dear Ms. Reed: I am writing to you to request a Bill of Particulars regarding the offenses charged in the indictment dated April 27, 2022. A Bill of Particulars serves to provide a defendant with essential details of the charges against him to ensure that he is adequately "informed of the nature and cause of the accusation" under the Sixth Amendment and can be prepared to meet the charges and avoid surprise. See *Russel v. United States*, 369 U.S. 749, 763 (1962). In count one, you charge Mr. Kevin Seefried with obstruction of an official proceeding and aiding and abetting, in violation of 18 U.S.C. § 1512 (c)(2) and (2). You allege that Mr. Kevin Seefried "corruptly" obstructed, influenced, and impeded an official proceeding. Please proffer the facts underlying your allegation that Mr. Kevin Seefried had corrupt intent. In addition, please indicate whether you have charged Mr. Kevin Seefried as a principal offender or as an aider and abettor. If you are charging Mr. Kevin Seefried as an aider and abettor, please indicate the individual(s) that you believe Mr. Kevin Seefried aided and abetted and the factual basis underlying your theory that Mr. Kevin Seefried shared the same intent as that individual. In counts two and three, you charge Mr. Kevin Seefried with entering and remaining in a restricted building (count two) and disorderly and disruptive conduct in a restricted building (count three) where he was temporarily visiting. Please indicate the nature of the violent conduct you are alleging for Mr. Kevin Seefried. Please also indicate the times that the Vice President was temporarily visiting and the times that you allege that Mr. Kevin Seefried was on Capitol grounds. In count four, you charge Mr. Kevin Seefried with disorderly conduct in the Capitol Building. Please indicate the nature of the disorderly and disruptive conduct. Please also provide the facts underlying your allegation that Mr. Kevin Seefried intended to impede, disrupt and disturb the orderly conduct of a session of Congress. In doing so, please provide the relevant times that Congress was in session on January 6th as well as the times that Mr. Kevin Seefried was engaged in this conduct. I would appreciate a timely response so that we may file a motion with the Court under Federal Rule of Criminal Procedure 7(f) if you decline to provide a Bill of Particulars. Please let me know if you have any questions. Best, /s/ Eugene Ohm Attorneys for Kevin Seefried Assistant Federal Public Defender
Re: United States v. Kevin Seefried, 21-cr-287

Brittany Reed

Assistant United States Attorney

Eastern District of Louisiana

650 Poydras St.

New Orleans, LA 70130

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In count one, you charge Mr. Kevin Seefried with obstruction of an official proceeding and aiding and abetting, in violation of 18 U.S.C. § 1512 (c)(2) and (2). You allege that Mr. Kevin Seefried "corruptly" obstructed, influenced, and impeded an official proceeding. Please proffer the facts underlying your allegation that Mr. Kevin Seefried had corrupt intent. In addition, please indicate whether you have charged Mr. Kevin Seefried as a principal offender or as an aider and abettor. If you are charging Mr. Kevin Seefried as an aider and abettor, please indicate the individual(s) that you believe Mr. Kevin Seefried aided and abetted and the factual basis underlying your theory that Mr. Kevin Seefried shared the same intent as that individual.

In counts two and three, you charge Mr. Kevin Seefried with entering and remaining in a restricted building (count two) and disorderly and disruptive conduct in a restricted building (count three) where he was temporarily visiting. Please indicate the nature of the violent conduct you are alleging for Mr. Kevin Seefried. Please also indicate the times that the Vice President was temporarily visiting and the times that you allege that Mr. Kevin Seefried was on Capitol grounds.

In count four, you charge Mr. Kevin Seefried with disorderly conduct in a Capitol Building. Please indicate the nature of the disorderly and disruptive conduct. Please also provide the facts underlying your allegation that Mr. Kevin Seefried intended to impede, disrupt and disturb the orderly conduct of a session of Congress. In doing so, please provide the relevant times that Congress was in session on January 6th as well as the times that Mr. Kevin Seefried was engaged in this conduct.

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Please let me know if you have any questions.

Best,

/s/

Eugene Ohm
Attorneys for Kevin Seefried
Assistant Federal Public Defender