

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA)	
Plaintiff)	Criminal Case 21-CR-28
)	
v.)	Trial: February 1, 2023
)	
WILLIAM ISAACS)	Judge Amit P. Mehta
Defendant)	

DEFENDANT'S DISCLOSURE OF EXPERT

COMES NOW Defendant William Isaacs, by and through his counsel, and hereby files his notice of expert, pursuant to Fed. R. Crim. P. 16(b)(1)(C) and the Court's Scheduling Order, dated July 1, 2022, as amended October 28, 2022. The Defendant hereby discloses that he shall call as a trial witness Laurie Allyn Sperry, Ph.D., BCBA-D, MSc Forensic Psychology/Criminal Investigation, who will offer expert testimony under Fed. R. Evid. 702, 703, and 705.

Dr. Sperry has a Ph.D., is a Board Certified Behavior Analyst - Doctoral Level, and has an additional master's degree in forensic psychology and criminal investigations. She was awarded a Fulbright Senior Specialist in Autism. Dr. Sperry will base her opinions on her experience and qualifications, as described in attached Exhibit A (curriculum vitae).

Dr. Sperry has reviewed the Defendant's relevant medical, psychological, and educational records, which document his diagnosis of Autism Spectrum Disorder, (ASD) (previously known as "Asperger's Disorder"). Moreover, she has also personally interviewed one or more witnesses, including his mother, with knowledge of the

Defendant's condition and personally history. Dr. Sperry also personally interviewed William and conducted recognized test(s) relevant to his condition and confirmed the diagnosis noted above. In addition, Dr. Sperry has reviewed video and other evidence produced in this case and observed the Defendant's conduct on that date.

Everything Dr. Sperry has read, heard, and viewed concerning the Defendant confirms the diagnosis that he has ASD, which played a substantial and likely controlling role in his conduct on January 6, 2021; and that ASD is a substantial factor and circumstance that must be considered in determining whether he had the requisite intent to commit the offenses with which he is charged. Dr. Sperry's will express an opinion within a reasonable degree of scientific probability that the Defendant lacked the capacity to fully understand what was happening on January 6. And, she will further testify that the Defendant would have been lured by the crowd and chaos around him into saying and doing things that he did not fully comprehend or intend. Instead of being able to fully diagnose events transpiring at a rapid rate, she will testify that he was likely in a dissociative state, where he would have had pinpointed focus on narrow and discrete things then occurring.

Dr. Sperry will further testify regarding the characteristics of ASD and the role these characteristics played in the Defendant's conduct upon which the charges against him were made. She will explain the impairments associated with ASD, including, but not limited to, social impairments, social isolation, and loneliness that lead to a desire for belonging, community, and purpose. She will describe additional autistic impairments, such as executive functioning deficits, including problems starting,

organizing, planning, and completing tasks that would have made it difficult for him to plan his actions and were much more likely to result in him following the lead of others, especially those whom he perceived to be in positions of authority, such as the former President of the United States, members of the military, and the first responders, whom he had historically admired, who comprised much of the group he had followed that day.

Dr. Sperry will also testify that modeling is a treatment strategy frequently used with people with ASD and a technique that was utilized with the Defendant, as documented in his educational records. Children with autism are taught to look at what other people around them are doing, and are encouraged to do that too as a way of teaching them to notice and imitate social behaviors. It is understandable then, that William would use echoed language and imitated the behavior of those around him in the crowd.

Moreover, people with autism have weak central coherence. In other words, their ability to hyperfocus on details makes it difficult for them to see the forest for the trees. According to Dr. Sperry, the Defendant was focused on the details of providing security and having a practical opportunity to provide basic first aid as needed, while failing to recognize the big picture of what was happening around him.

Dr. Sperry may also offer more detailed testimony about these matters based on hypothetical assumptions presented to her that are based on the documents to be offered in evidence or testimony by other witnesses.

Respectfully submitted,



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Counsel for Defendant William Isaacs

CERTIFICATE OF SERVICE

I hereby certify that the **DEFENDANT'S DISCLOSURE OF EXPERT** was filed with the Clerk of the Court via ECF and emailed to counsel for the United States on Tuesday, November 15, 2022.

Respectfully submitted,

A handwritten signature in blue ink that reads "Gene Rossi". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Gene Rossi, Esquire