

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : 1:21-CR-618-ABJ
 :
 v. :
 :
 RILEY JUNE WILLIAMS :

**DEFENDANT’S RESPONSE TO UNITED STATES’ MOTION *IN LIMINE*
REGARDING CROSS-EXAMINATION OF SECRET SERVICE WITNESS**

Defendant Riley June Williams, by and through her attorneys, hereby respectfully submits this response to the Government’s Motion *in limine* Regarding Cross-Examination of Secret Service Witnesses. (Doc. 73).

RESPONSE

The Government seeks to preclude the defendant from cross-examining any Secret Service witnesses about the following areas:

1. Secret Service protocols related to the locations where protectees or their motorcades are taken at the Capitol or other government buildings when emergencies occur; and
2. Details about the nature of Secret Service protective details, such as the number and type of agents the Secret Service Assigns to Protectees.

Taking the second area of the Government’s motion first, defense counsel submits that we do not intend to cross-examine any Secret Service witness about

the nature of Secret Service protective details, and therefore we offer no opposition to this portion of the Government's motion *in limine*.

Regarding cross-examination concerning Secret Service protocols related to where protectees/motorcades are taken during emergencies, defense counsel does not intend to cross-examine any Secret Service witness about the generalities of such protocols. Defense counsel might, however, seek to elicit testimony about where Vice-President Pence was (or was not) relative to where Ms. Williams was within the Capitol Building at specific times on January 6. Such evidence is relevant to certain elements of Counts Five and Six of the indictment, which charge Ms. Williams with Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1) (Count Five) and Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(2) (Count 6).¹

In any event, the Defendant should not be foreclosed from cross-examining any Secret Service witnesses about information that has become public knowledge in the wake of January 6. For example, it has been widely reported by the news media that, after his evacuation from the Senate Chamber, Vice President Pence was first moved to his office and then into a parking garage/bunker underneath the

¹ On Counts Five and Six, the Government must prove beyond a reasonable doubt that the *actus rei* occurred in a "restricted building or grounds," which means any posted, cordoned off, or otherwise restricted area of a building or grounds where a person protected by the Secret Service - here, Vice President Pence - is or will be temporarily visiting. *See* 18 U.S.C. § 1752 (a)(1) and (2).

Capitol grounds.² Photos of these moments have been published by the media,³ and the National Archives was ordered to turn the photographs over to the House select committee investigating January 6.⁴ Given that this information is readily available to the public, the Government cannot realistically argue that defense counsel's examination into these areas would raise any security concerns.

Date: October 7, 2022

Respectfully submitted:

/s/ Lori J. Ulrich

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² [Mike Pence Hid in 'Loading Dock' in Underground Parking Garage During Jan. 6 Riot \(newsweek.com\); Jan. 6 committee reveals Pence hid in parking garage - The Washington Post](#)

³ [Reporter reveals photos showing Pence hiding during Capitol riot | Washington Examiner](#)

⁴ [National Archives to turn over Pence records to Jan. 6 committee - ABC News \(go.com\)](#)

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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 **Defendant's Response to United States' Motion *in limine* Regarding Cross-Examination of U.S. Secret Service Witness** 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

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