

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*
TO PRECLUDE IMPROPER DEFENSE ARGUMENTS AND EVIDENCE
ABOUT LAW ENFORCEMENT

Defendant Riley June Williams, by and through her attorneys, hereby respectfully submits this response to the Government’s Motion *in limine* to Preclude Improper Defense Arguments and Evidence about Law Enforcement. (Doc. 74).

RESPONSE

The Government seeks to preclude the defense from arguing 1) any entrapment by estoppel defense related to law enforcement; 2) offering evidence or argument that law enforcement’s failure to act made Ms. Williams’ entry into the Capitol building or grounds lawful; or 3) arguing or presenting evidence of alleged inaction by law enforcement unless specifically observed by Ms. Williams.

At this preliminary stage, Ms. Williams’ trial strategy and defenses have not been decided. Currently, she does not intend to argue or offer evidence on any of the areas the Government sets forth in its motion and therefore offers no opposition

to them. However, Ms. Williams does reserve the right to argue in favor of introducing such evidence or argument should her trial strategy or defense change during preparation.

Date: October 7, 2022

Respectfully submitted:

/s/ Lori J. Ulrich

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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* to Preclude Improper Defense Arguments and Evidence about Law Enforcement** 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: October 7, 2022

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