

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 EVIDENCE ABOUT THE SPECIFIC LOCATIONS OF U.S.
CAPITOL POLICE SURVEILLANCE CAMERAS

Defendant Riley June Williams, by and through her attorneys, hereby respectfully submits this response to the Government’s Motion *in limine* Regarding Evidence about the Specific Locations of U.S. Capitol Police Surveillance Cameras. (Doc. 75).

RESPONSE

The Government seeks an order from the Court limiting the defense from cross-examining witnesses about the exact locations of United States Capitol Police (“USCP”) surveillance cameras in the U.S. Capitol and from using the maps, that were provided in discovery and designated as “Highly Sensitive,” showing the location of the cameras.

Ms. Williams does not oppose this motion. The defense will not use or present the camera map at trial, nor will counsel question witnesses about the exact location of the surveillance cameras.

Ms. Williams does submit, however, that she should be permitted to question witnesses about the lack of video footage of her in certain areas. To be specific, in Count Four of the indictment, Ms. Williams is charged with aiding and abetting the theft of government property, that being a Hewlett-Packard laptop from the office suite of Speaker Pelosi. As of this writing, no USCP footage of Ms. Williams in Speaker Pelosi's office has been provided to the defense, and this is because no USCP cameras are located in Speaker Pelosi's office. Ms. Williams should be permitted to establish this fact at trial through cross-examination of appropriate law enforcement witnesses.

Date: October 7, 2022

Respectfully submitted:

/s/ Lori J. Ulrich

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

/s/ A.J. Kramer

A.J. KRAMER, ESQUIRE
Federal Public Defender
625 Indiana Avenue, NW
Washington, D.C. 20004
Tel. No. (202) 208-7500
a._j._kramer@fd.org

/s/Brandon R. Reish

BRANDON R. REISH, ESQUIRE

Assistant Federal Public Defender

201 Lackawanna Avenue, Suite 317

Scranton, PA 18503

Tel. No. (570)343-6285

Fax No. (570) 343-6225

brandon_reish@fd.org

Attorneys 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 **Defendant's Response to United States' Motion *in limine* Regarding Evidence about the Specific Locations of U.S. Capitol Police Surveillance Cameras** 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 DALKE, ESQUIRE
Assistant United States Attorney
samuel.s.dalke@usdoj.gov

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

RILEY JUNE WILLIAMS

Date: October 7, 2022

/s/ Lori J. Ulrich
LORI J. ULRICH, ESQUIRE
Assistant Federal Public Defender
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