

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

RILEY JUNE WILLIAMS

No. 1:21-cr-618 (ABJ)

**JOINT PRETRIAL STATEMENT**

Pursuant to the Court's August 19, 2022, Scheduling Order (ECF No. 67), the parties submit the following joint pretrial statement:

**A. Proposed Statement of the Case**

The United States has charged the defendant in connection with events which occurred at the United States Capitol on January 6, 2021. Count One charges the defendant with obstructing, impeding, and interfering with law enforcement officers from the United States Capitol Police or District of Columbia Metropolitan Police Department during a civil disorder. Count Two charges the defendant with obstructing an official proceeding, specifically Congress's meeting at the U.S. Capitol on January 6, 2021, to certify the Electoral College vote for president, or aiding and abetting others in obstructing that proceeding. Count Three charges the defendant with assaulting, resisting, opposing, impeding, intimidating, or interfering with law enforcement officers inside the Capitol building or on the grounds. Count Four charges the defendant with stealing government property, or aiding and abetting another person in stealing the property. Counts Five through Eight charge the defendant with entering and remaining in a restricted building or grounds, disorderly or disruptive conduct in a Capitol building or restricted area, and parading, demonstrating, or picketing in a Capitol building.

The defendant has pleaded not guilty to all charges.

**B. Estimate of the Number of Trial Days**

The parties anticipate the trial will last five to six trial days.

**C. List of Outstanding Motions *in Limine***

- Defense Motion *in Limine* to Preclude Testimony or Evidence concerning the defendant's references to taking a gavel and hard drives from the Speaker's Office (ECF Nos. 72, 86, 88)
- Government Motion *in Limine* to limit the cross-examination of U.S. Secret Service Witnesses (ECF Nos. 73, 82)
- Government Motion *in Limine* to preclude improper defense arguments and evidence about law enforcement (ECF Nos. 74, 83)
- Government Motion *in Limine* to restrict presentation of evidence regarding the specific position of U.S. Capitol Police surveillance cameras (ECF Nos. 75, 84)
- Government Motion *in Limine* regarding authentication of certain video and photograph evidence (ECF Nos. 76, 85)
- Government's Notice of Intent to Introduce Other Crimes, Wrongs, or Acts of the Defendant as Intrinsic Evidence or Under Fed. R. Evid. 404(b) (ECF Nos. 77, 81, 89)

**D. Proposed *Voir Dire***

A copy of the proposed *voir dire* questions is attached as Exhibit A. There are no disagreements regarding the proposed *voir dire*.

**E. Proposed Jury Instructions**

A copy of the parties' proposed jury instructions, with references to the applicable Standardized Criminal Jury Instructions for the District of Columbia, is attached to this submission as Exhibit B. Objections regarding the proposed jury instructions are noted below the proposed instructions, where there is a disagreement.

**F. List of Witnesses**

Likely witnesses in the Government's case-in-chief:

U.S. Capitol Police Captain Carneysha Mendoza  
U.S. Capitol Police Supervisory Special Agent Kevin E. Bull  
U.S. Capitol Police Officer Doug Luckel  
U.S. Capitol Police Officer Mark Gazelle  
Former U.S. Capitol Police Officer Chris Lanciano  
FBI Special Agent Jonathan Lund  
FBI Special Agent Richard Oh  
FBI CART investigator Michael P. Moore  
FBI CART investigator Michael Avella  
Metropolitan Police Department Officer Darrin Bates  
Metropolitan Police Department Officer Randy Done  
Metropolitan Police Department Officer Michael Reese  
Metropolitan Police Department Officer Rochelle Butler Elliott  
U.S. Secret Service Inspector Lanelle Hawa  
Marc Dalton Jr.  
Jonah Thomas  
Ryan Patrick Myers  
Edgar Tibbett

Possible additional witnesses that may be called by the Government:

Ricky Williams  
Braiden Williams  
Michael Prodanov  
Tyler Rumsey  
Hudson George  
Cyrus Sanders, Jr.  
FBI Special Agent Angela Strause  
FBI Special Agent Clinton Chelbowski  
Former U.S. Capitol Police Officer Kyle Yetter

TBD Staff/Former Staff employed at the U.S. Capitol Building on January 6, 2021  
Metropolitan Police Department Officer Benjamin Rubin  
Metropolitan Police Department Officer Ashley Mancuso  
Metropolitan Police Department Officer Anam Mumtaz  
Metropolitan Police Department Officer Sean McCloskey  
Metropolitan Police Department Officer Robert Marsh

Possible witnesses in the defendant's case-in-chief:

Wendy Williams  
Detective Jeffrey Corcoran  
Ian Hoyt Franz  
FBI Agent Jonathan Lund  
FBI Agent Wendy Terry  
FBI Agent Michael Thompson

The parties request permission to amend their witness lists in advance of trial as needed during the course of trial preparation.

**G. List of Expert Witnesses**

Neither party intends to call an expert witness in their case-in-chief.

**H. List of Prior Convictions**

The parties are not aware of any prior convictions of the defendant.

**I. List of Exhibits**

Copies of the Exhibit Lists for the Government and Defense are attached to this submission as Exhibits C and D, respectively. The objections to the proposed exhibits are listed in the far-right column of the exhibit lists. The parties request the Court's permission to amend their exhibit lists in advance of trial as needed during the course of trial preparation.

**J. Stipulations**

At this time, the parties have not reached any stipulations. The parties request the Court's permission to submit stipulations in advance of trial if they are able to come to an agreement.

**K. Judicial Notice**

The parties are not requesting judicial notice at this time.

**L. Proposed Verdict Form**

Copies of the proposed Verdict Forms for the Government and Defense are attached to this submission as Exhibits E and F, respectively.

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY  
D.C. Bar No. 481 052

/s/ Michael M. Gordon

MICHAEL M. GORDON  
Assistant United States Attorney  
Florida State Bar No. 1026025  
400 N. Tampa St., Suite 3200  
Tampa, Florida 33602  
Tel. No.: (813) 274-6370  
michael.gordon3@usdoj.gov

/s/ Lori J. Ulrich

LORI J. ULRICH  
Assistant Federal Public Defender  
Attorney ID #55626  
100 Chestnut Street, Suite 306  
Harrisburg, PA 17101  
Tel. No. (717) 782-2237  
lori\_ulrich@fd.org

/s/ Samuel S. Dalke

SAMUEL S. DALKE  
Assistant United States Attorney  
Pennsylvania State Bar No. 311083  
228 Walnut Street, Suite 220  
Harrisburg, PA 17101  
Tel. No.: (717) 221-4453  
samuel.s.dalke@usdoj.gov

/s/ Brandon R. Reish

BRANDON R. REISH  
Assistant Federal Public Defender  
Attorney ID# PA 91518  
201 Lackawanna Avenue, Suite 317  
Scranton, PA 18503  
Tel. No. (570) 343-6285  
brandon.reish@fd.org

*Counsel for the Government*

*Counsel for Defendant*