

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : Criminal No. 1:21-CR-00618  
: :  
v. : (Judge Berman Jackson)  
: :  
RILEY JUNE WILLIAMS : (Electronically Filed)

**BRIEF IN SUPPORT OF  
MOTION TO AMEND CONDITIONS OF RELEASE**

The defendant, Riley June Williams, has been on release with pretrial supervision since January 21, 2021. Ms. Williams' current conditions of pretrial release include home detention with electronic location monitoring. Ms. Williams has been compliant with all conditions of her supervised release over the previous sixteen (16) months. In consideration of her good behavior and her employment, Ms. Williams requests that the Court remove the conditions of home detention and electronic location monitoring condition from her conditions of pretrial release.

**I. RELEVANT PROCEDURAL AND FACTUAL HISTORY**

Following the events of January 6, 2021 at the United States Capitol, a criminal complaint with subsequent amendments was filed against Ms. Williams in the District of Columbia. On January 25 and 26, 2021, Ms. Williams appeared, via video link, before United States Magistrate Judge Zia M. Faruqui for an initial appearance.<sup>1</sup> Following a hearing, Magistrate Judge Faruqui released Ms. Williams

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<sup>1</sup> Ms. Williams is a resident of the Middle District of Pennsylvania.

with pretrial supervision. Included in Ms. Williams' conditions of release are home detention and electronic location monitoring. Accordingly, Ms. Williams is restricted to her residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer. *See* Doc. 29, Order Setting Conditions of Release.

Magistrate Judge Faruqi also ordered that Ms. Williams' mother, Wendy Williams (hereinafter "Mrs. Williams"), serve as Ms. Williams' third-party custodian. Pursuant to the release order, Ms. Williams is to "seek access via third party custodian to use iPad/smart phone to video call with attorney, PSA to check-in, and mental health appointments." As third-party custodian, Mrs. Williams was also directed to monitor Ms. Williams' Smart TV usage, and to permit pretrial services officers to search her residence to ensure Ms. Williams' compliance with the conditions. Ms. Williams was also directed to purchase a flip phone within five days for future cellphone use.

On October 6, 2021, a grand jury returned an indictment against Ms. Williams, charging her with civil disorder, in violation of 18 U.S.C. § 231(a)(3) (Count 1); obstruction of an official proceeding, in violation of 18 U.S.C. §§ 1512(c)(2) and 2 (Count 2); assaulting, resisting, or impeding certain officers, in violation of 18 U.S.C. § 111(a)(1) (Count 3); theft of government property, in

violation of 18 U.S.C. § 641 and 2 (Count 4); entering and remaining in a restricted building or grounds, in violation of 18 U.S.C. § 1752(a)(1) (Count 5); disorderly and disruptive conduct in a restricting building or grounds, in violation of 18 U.S.C. § 1752(a)(2) (Count 6); disorderly conduct in a Capitol building, in violation of 40 U.S.C. § 5104(e)(2)(D) (Count 7); and parading, demonstrating or picketing in a Capitol building, in violation of 40 U.S.C. § 5104(e)(2)(G) (Count 8). (Doc. 27). On October 18, 2021, Ms. Williams appeared before this Honorable Court for an arraignment. At that time, her pretrial release with the conditions described above were continued.

Ms. Williams resides at her mother's residence in the Middle District of Pennsylvania. Ms. Williams is currently employed at a nursery located in the Middle District of Pennsylvania. She works a full-time schedule, generally from 9 a.m. to 5 p.m. Ms. Williams attends mental health counseling and nine months ago became a member of a local Baptist church.<sup>2</sup> The United States Probation Office has filed four status reports in this matter related to Ms. Williams' compliance with her conditions – all of the reports indicate that Ms. Williams has been in full compliance with her conditions of release for the previous sixteen (16) months. (Docs. 22, 26, 30 and 44).

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<sup>2</sup> Ms. Williams can provide the name of her employer as well as her congregation to the Court *in camera*, should the Court so request.

## II. ARGUMENT

A criminal defendant's pretrial release is governed by Section 3142 of Title 18 of the United States Code. Pursuant to section 3142(c)(B), when a judicial officer releases a defendant on pretrial supervision conditions, those conditions must be "the least restrictive" conditions necessary to assure the defendant's presence at future court proceedings and to protect the safety of the community. *See* 18 U.S.C. § 3142(c)(B).

Ms. Williams' current conditions of release are extensive. As noted above, she is on home detention and location monitoring. Thus, Ms. Williams is restricted to her residence at all times with few exceptions. Ms. Williams wears an electronic ankle bracelet to monitor her movements. Further, Ms. Williams is prohibited from traveling outside of the Middle District of Pennsylvania<sup>3</sup> and is prohibited from obtaining a passport or international travel documents. Ms. Williams is prohibited from the use of drugs and excessive alcohol, and she must submit to drug testing as directed by her pretrial services officer. Ms. Williams is prohibited from possessing a firearm or dangerous weapon. Finally, Ms. Williams is required to maintain steady employment.

Ms. Williams submits that the conditions of home detention with electronic location monitoring are unduly extensive, and that her appearance at court and the

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<sup>3</sup> Ms. Williams is permitted to travel to the District of Columbia to attend in-person court appearances.

safety of the community can be ensured with a lesser combination of conditions. Ms. Williams has abided by the conditions of her pretrial supervision without incident or infraction for sixteen (16) months. She has maintained employment throughout this period. She is participating in counseling and has become a member of a Baptist congregation, which keeps her busy and engaged in her community. Additionally, Ms. Williams' mother, Wendy Williams, is her third-party custodian. Mrs. Williams has agreed to supervise her daughter and ensure her appearance at all court proceedings. Ms. Williams is not a flight risk -- she has appeared for all court appearances without incident. Finally, given the procedural posture of this matter, it is likely that a resolution of this matter will not occur until some point in 2023. Requiring Ms. Williams to remain on home detention with electronic location monitoring for the duration of that time is unduly burdensome.

### III. CONCLUSION

Ms. Williams respectfully requests that the Court modify her conditions of pretrial release and remove the conditions of home detention and electronic location monitoring.

Respectfully submitted,

Date: May 27, 2022

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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 **Brief in Support of Motion to Amend Conditions of Release** 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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