

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

**UNDER SEAL PORTION - PART IV OF
DEFENDANT’S SENTENCING MEMORANDUM**

Defendant Riley June Williams, by and through her attorneys, submits the within sealed portion of a sentencing memorandum addressing the history and characteristics of Ms. Williams, and the nature and circumstances of the offense pursuant to 18 U.S.C. § 3553(a)(1). Sentencing in this matter is scheduled for February 22, 2023 at 9:30 a.m.

IV. 18 U.S.C. § 3553(a)(1) – THE HISTORY AND CHARACTERISTICS OF MS. WILLIAMS AND THE NATURE AND CIRCUMSTANCES OF THE OFFENSE

A. Background

At the request of the then-President of the United States, thousands of people went to Washington D.C. to attend the “Stop the Steal” rally. There, several prominent people spoke. The speakers included, among others, sitting members of Congress, a law professor, the President’s attorney, the Texas Attorney General and the President. And, consistent with the theme of the rally, the speakers complained about a stolen election. At the end, the President urged the attendees to march to the Capitol. Riley Williams was one of those in attendance. She had just turned 22. And, she attended the rally with her father and his friends. She carried only a fuzzy zebra striped bag and her cell phone. Plain and simple, she went to see Trump’s speech. She made the regretful decision to go to the Capitol, initially believing it to be the White House. Her conduct on that day was captured by various forms of cameras – CCTV footage, videos

taken by other protestors, and videos taken by Ms. Williams herself. There is no dispute that she unlawfully entered, acted obnoxiously and inappropriately, and pushed against the police who were just trying to do their job. While her conduct was highly inappropriate, it is important to note that she did not carry a weapon or convert an every-day item to a weapon, nor did she punch, kick, or spray any officer with an irritant. Ms. Williams did not come dressed in or carrying any form of tactical gear. And, she had no preconceived intent to go to the Capitol that day.

And yet, the Government's portrayal of Ms. Williams paints a distorted picture. They have made her the face of the theft of then Speaker Pelosi's laptop, they have vilified her in the media, they have yet to acknowledge that her actions had no effect on the theft of the computer or that "backpack" guy stole the laptop, they have characterized her as a despicable white supremacist, and they have cast her as a leader of the insurrection. *See* Exhibits attached to PSR, ¶ 21, (Ex. A and B, a fraction of the media headlines and the number of google hits for Ms. Williams, attached). This portrayal is divorced from the facts presented at trial and the reality of her life.

At now just 24 years of age, Ms. Williams has been through a lot, not just these past two years, but throughout her life. [REDACTED]

[REDACTED] She has a brother, a step-sister, and a step-brother. *See* PSR, ¶¶ 81-83. [REDACTED]

[REDACTED]

B. [REDACTED]

Just prior to January of 2021, Ms. Williams was in a very volatile relationship, one that continues to haunt her to this day. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Ms. Williams had to file a protection from abuse petition against him. [REDACTED] [REDACTED]

[REDACTED]
[REDACTED]. Despite the PFA, [REDACTED] harassing ways towards Ms. Williams have not ended. He appeared in the Courthouse during trial and demanded access to the proceedings and wanted real time transcribing from the Court Reporter. [REDACTED]

C. Prior Employment

On January 6, 2021, Ms. Williams was employed by [REDACTED] in Harrisburg. She cared for people with disabilities within their homes as a direct support professional. *See* PSR, ¶ 121. She was fired because of her conduct in this case. *Id.* While the presentence report only contains the negative reports of her employment, a couple, [REDACTED] [REDACTED] sought out defense counsel and asked what they could do to help Ms. Williams. Counsel met with [REDACTED] at their house, met their disabled daughter, and discussed Ms. Williams' interactions with them and their daughter. [REDACTED] have provided a letter, attached. [REDACTED] The [REDACTED] heartfelt letter details the care, compassion, and attention Ms. Williams' provided to their daughter while she was in a group home. Ms. Williams took good care of their profoundly

disabled daughter, making meals for her, taking care of her bathroom needs, as well as her medications. *Id.* [REDACTED] detail an occasion when their daughter was rushed to the hospital after an epileptic seizure unaccompanied by anyone from the group home. Ms. Williams, when she arrived to work that morning, found out about the accident and rushed to the hospital to be with their daughter. Ms. Williams not only aided their daughter, but she was of great assistance to [REDACTED] at the hospital. *Id.* Ms. Williams lost this job as a result of her involvement in the events of January 6 and the extensive media coverage as well as the inappropriate actions of [REDACTED]

While on house arrest, Ms. Williams, despite all the obstacles presented by the pending charges, held steady employment. Significantly, the PSR does report that with respect to the job at [REDACTED], the employer reported that Riley was a ‘good employee’ and had a ‘great attitude.’ She would be reconsidered for employment. *See* PSR, ¶ 117. Likewise, [REDACTED] reported that Ms. Williams was ‘intelligent’ and works hard.” She would be considered for reemployment. *See* PSR, ¶ 120. So, while the report seems to portray Ms. Williams’ mainly in a negative light, she is indeed a caring and compassionate human being. And, at just 24 years of age and no prior record, she has paid the price for her involvement in the January 6 insurrection in part by losing jobs that she was good at and enjoyed.

D. Family Support

Indeed, letters from her family members and her fiancé shed light on who Ms. Williams really is. By most accounts, and like so many teenagers, Ms. Williams was rebellious and hard to control. Unfortunately, that generation is all too familiar with social media and technology. It seems to be the primary way they communicate. So, it is not surprising that Ms. Williams, still a

child, who grew up in a tumultuous family setting, would seek out groups that may accept her.¹ And with that generation, it is all too easy to be swept up in these groups because of social media.

Ms. Williams' step-mother, [REDACTED] notes that she has "seen [Riley] struggle through the years trying to find out who she is and what she stands for." *See* (Exhibit B, [REDACTED] [REDACTED] "I think Riley got swept up in the things on January 6th as so many others did. I think she said things on Social Media to make herself look like something she was not and spoke about things that were not true." *Id.* This is in fact what happened; yet the government to this day refuses to acknowledge this. For instance, on her social media accounts following January 6th, she boasted that she "stole nancy pelosi's hard drive and gravel." The government knows this is not true, but it fails to recognize it - almost all her actions were caught on camera and there is no evidence of this – just another example of Riley exaggerating the events of that day online.

Ms. Williams' Grandmother, [REDACTED] notes that Ms. Williams is "extremely loving and caring, however sometimes she makes bad decision and is often led astray by others. But she truly has a kind heart. Anyone that comes in contact with Riley can attest to that." *See* (Exhibit C, letter from [REDACTED] [REDACTED] Ms. Williams' has gone "out of her way to help" [REDACTED] *Id.* Just as important, [REDACTED] notes that in her conversations with Ms. Williams, she believes that she has learned the error of her ways. *Id.*

[REDACTED] Riley Williams' father, notes that since January 6th, she is more focused

[REDACTED]

on her spiritual walk with God. *See* (Exhibit D, letter from [REDACTED]). They have talked about the need to stay away from “social media and Politics.” *Id.* He too notes that “I think she realized her actions were wrong and that some day she can be a productive member of society who makes better decisions for hers.” *Id.*

Her mother, [REDACTED] also talks about the compassionate and caring side of Ms. Williams. *See* (Exhibit E, letter from [REDACTED]). Ms. Williams longs for a simple life. Her dream for the future is to have a “home on a large plot of land, a large family, lots of vegetables and fruits growing in a garden, and farm animals to raise for their own consumption.” *Id.* She talks about how she and Riley were “evicted” from their apartment in January 2021 because the media had “camped” out in their parking lot. *Id.* They had 10 days to vacate, despite her own health issues. *Id.* She notes how helpful Riley was when they had to spend 6 months sharing a bedroom in Riley’s grandmother’s house. *Id.* During her almost two years on house arrest, Riley took up other interests such as crocheting. She gave away a lot of the purses, blankets, and clothing she made as gifts. *Id.* [REDACTED] talks about how Riley worked at various jobs during her two years of house arrest. Riley had to give up a job she loved to attend trial, but a coworker reached out to [REDACTED] to express how sad he/she was that Riley would not be home for the holidays. *Id.* [REDACTED] also sees that Riley is a different person today than the young girl that went to the Capitol on January 6. *Id.*

Ms. Williams’ fiancé, [REDACTED], begins by saying “I can say without a shadow of a doubt she has the biggest heart out of anyone I have ever met.” *See* (Exhibit F, letter from [REDACTED]). [REDACTED] frankly notes that house arrest probably saved Ms. Williams. Prior to being on house arrest, she was focusing on internet culture and various forms of degeneracy and

escapism. *Id.* After being placed on house arrest, her old habits were put to a halt, “forcing her to truly face the reality in which she was living.” *Id.* “[S]he was forced to break old habits, new ones took their place.” She is now actively involved in the church. *Id.* [REDACTED] notes the stress that she has been under these last two years [REDACTED] [REDACTED] *Id.*

Lastly, a letter from her current Pastor, [REDACTED] confirms that Ms. Williams is not the monster that the government and media have made her out to be. She has been regularly attending church at the [REDACTED] Baptist Church, where she has participated in the activities of the church including Trunk or Treat and the Outreach Committee. Pastor [REDACTED] notes, “[i]t is my belief that the young lady that participated in the events of January 6, 2021, is not the same young lady who has been attending our church over the last year. She is and still is a valuable member of the church and the community who I am sure is aware of the things she has done wrong and has sought the forgiveness of the God she serves. I ask you to consider who she is today and how she has changed course in her life since that very day. She is a strong believer in God and her faith is paramount to who she is today.” [REDACTED] [REDACTED]).

So, far from the Government’s portrayal of Riley Williams as this horrible human being, she is a caring and compassionate young woman and just trying to find her way. And, like so many young adults, she has taken some wrong turns and made bad decisions. At 24 years of age, she’s experienced almost two years of home detention, 3 months of incarceration, felony convictions, and is depicted as a villain in the media. But those closest to her recognize the significance of her arrest and convictions, and her change of ways for the better.

V. CONCLUSION

As set forth in more detail in Ms. Williams' unsealed Sentencing Memorandum, a sentence of 12 months and a day is sufficient but not greater than necessary in this case.

Date: March 27, 2023

Respectfully submitted:

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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 **Under Seal Portion of Defendant's Sentencing Memorandum** 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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