

Zachary Rehl Additional Sentencing Arguments

Zachary Rehl should serve 30 years (360 months) in prison for his role in advancing a seditious conspiracy to oppose by force the lawful transfer of Presidential power. Rehl drove from Philadelphia to Washington and led—along with Biggs and Nordean—a march of approximately 200 from the Washington Monument to the Capitol, where on the way he served a key logistical role and communicated with other co-conspirators who were not in the District of Columbia, passing them information about the conditions on the ground. Rehl encouraged rioters at the initial breach, yelling “fuck them! Storm the Capitol!” While on Capitol grounds, Rehl—the son and grandson of Philadelphia police officers—personally assaulted law enforcement officers with a chemical irritant spray. He then lied about that assault while under oath and testifying in his own defense at trial.

I. Sentencing Guidelines Analysis

Zachary Rehl was convicted of Counts One through Six. The Sentencing Guidelines are applied for each of the convictions as follows:

Count One (Seditious Conspiracy)

Count Two (Conspiracy to Obstruct an Official Proceeding)

Count Three (Obstruction of an Official Proceeding)

Count Four (Conspiracy to Use Force, Intimidation, or Threats to Prevent Officers of the United States from Discharging Their Duties)

Base Offense Level:	14	§2J1.2(a)
Specific Offense Characteristic	+8	§2J1.2(b)(1)(B) (physical injury)
Specific Offense Characteristic	+3	§2J1.2(b)(2) (substantial interference)
Specific Offense Characteristic	+2	§2J1.2(b)(3)(C) (extensive in scope, planning, or preparation)
Adjustment	+3	§3B1.1(b) (aggravating role—manager or supervisor)
Adjustment	+2	§3C1.1 (obstruction of justice)
Total	32	

Count Five (Interference with Law Enforcement During a Civil Disorder)

Base Offense Level:	14	§2A2.4(c) → §2A2.2
Specific Offense Characteristic	+2	§2A2.2(b)(1) (more than minimal planning)
Specific Offense Characteristic	+6	§3A1.2(b) (official victim)
Adjustment	+3	§3B1.1(b) (aggravating role—manager or supervisor)
Adjustment	+2	§3C1.1 (obstruction of justice)
Total	26	

Count Six (Destruction of Government Property)

Base Offense Level:	6	§2B1.1
Adjustment	+26 → 32	§3A1.4 (terrorism) (increase by +12 or to level 32)
Adjustment	+3	§3B1.1(b) (aggravating role—manager or supervisor)
Adjustment	+2	§3C1.1 (obstruction of justice)
Total	37	

All of these counts group. Accordingly, the total adjusted offense level for Rehl is 37 for the federal crime of terrorism in Count Six. As explained in the government’s Sentencing Memorandum , under Section 3A1.4(b), Rehl’s Criminal History Category is increased to VI, which results in a Guidelines range of 360 months (30 years) to life of incarceration.

The application of the terrorism enhancement under Section 3A1.4 captures the severity of the Rehl’s actions and the danger posed by Rehl and his co-conspirators’ conduct on January 6. A sentence within these Guidelines would be justified and entirely appropriate.

A. Zach Rehl’s Conduct Mandates Application of the Terrorism Enhancement

Rehl’s crimes were “calculated to influence or affect the conduct of government by intimidation or coercion, or to retaliate against government conduct.” U.S.S.G. §3A1.4. The jury’s guilty verdicts on Count One (seditious conspiracy) constitute a specific finding—beyond a reasonable doubt—that Tarrío, Nordean, Biggs, and Rehl “conspired or agreed with at least one other person with the goal of opposing by force the authority of the Government of the United States” *and* of “preventing, hindering, or delaying the execution of any law of the United States

by force.” ECF 767 (Jury Instruction) at 21; ECF 804 (Verdict Form) at 1. This finding, consistent with the facts accurately summarized in the draft presentence report, plainly establishes that the defendants’ crimes were calculated to influence or retaliate against the government by force or coercion. *See United States v. Dowell*, 430 F.3d 1100, 1110 (10th Cir. 2005) (holding that the jury made the factual finding that defendant had requisite intent to influence or affect the conduct of government by intimidation or coercion necessary for application of the Section 3A1.4 enhancement when the jury convicted defendant of attempting to interfere with IRS, having been instructed that an element of the offense was that defendant knowingly and intentionally “endeavored to obstruct or impede the due administration of the Internal Revenue laws by the use of force”).

Rehl spent his time as president of the Philadelphia Proud Boys trying to present a legitimate-looking front while behind the scenes amassing an army that was ready and willing to fight. For example, Rehl organized and participated in rallies in his native Philadelphia, and in private conversations going back to 2019, he acknowledged that he wanted to mobilize politically, and that winning elections would make or break them, but that “throwing down [violence] from time to time helps . . . it just can’t be the only thing we’re about.” Ex. 561-1. Rehl wanted his guys to be “jacked” and fast-tracked one who was “ready to crack skulls.” Ex. 560-4-5.

By the fall of 2020, Rehl was openly using violence committed by Proud Boys at rallies to recruit new members to the club and tying that violence to attempts to overturn the election result. He posted graphic videos of Proud Boys committing violence on the streets of Washington, D.C. to Parler, including multiple angles of a woman being knocked unconscious by a member of the Proud Boys. Ex. 602-10, 602-17. Rehl publicly celebrated Proud Boys getting “hype,” then “finish[ing]” Antifa, and he likened Proud Boys violence to standing up for America. Ex. 602-9.

Another post from the early morning hours of November 15, 2020, showcased a video Proud Boys violence, including superimposed text that read, “KILL THEM,” along with the election-related hashtags “#releasethekraken” and “#releasethecracken.” Ex. 602-12. In a subsequent post, Rehl indicated that these attacks were coordinated using “the same tactics” that the men had learned in the military. Ex. 602-14. Within hours of posting the videos glorifying violence committed by the Proud Boys at an election-related rally, Rehl posted a message to that same account with links for how to join the Proud Boys, and two days later, he praised the Philadelphia Proud Boys vetting chat for what Proud Boys generally, and Philadelphia members specifically, did in D.C. Ex. 602-15, 571-3.

As January 6 drew nearer, Rehl manifested both knowledge of the importance of the day and the violence that would be required if politicians did not do what he and his cohorts wanted them to do. For example, on Parler, he answered a question posted by another user about the importance of January 6 by informing the user that January 6 is “the day where Congress gets to argue the legitimacy of the electoral college votes.” Ex. 602.40. He also posted, on November 30, 2022, “[p]eople are waiting until the courts play out, we would rather let the constitution do its thing and not go apeshit if we dont have to.” Ex. 602-33. Rehl believed that the time for “standing by” was over, a reference to President Trump’s “stand back, stand by” comments. Rehl Ex. 1.

Rehl’s words and actions reveal his intent on January 6—he was there to use force and violence to influence his government and lead a civil war. As Rehl charged forward at the first street gates, he encouraged others with his cry, “Fuck them! Storm the Capitol!” As the riot was unfolding, Rehl texted his friends while battling in the West Plaza. Rehl told them that “[e]veryone raided the Capitol,” and described rioters being at a “standstill” with the police (*i.e.*, rioters were being held back from overrunning the building). Rehl personally acted to break this “standstill” by

assaulting officers with irritant spray. *See* discussion, *infra*, at Part I.C. Once Rehl reached the Upper West Terrace, he proudly declared that the “Civil war started.” Ex. 547-5.

Rehl’s messages after the riot erase any doubt that he had intended to influence or affect the conduct of government by intimidation or coercion, or to retaliate against government conduct. After learning that state capitals had also been stormed on January 6, Rehl told his mother, “Seems like our raid of the capital set off a chain reaction of events throughout the country. i’m so fucking proud.” Ex. 557-29. On January 7, he texted the same group he had previously informed about the “standstill” and the “Civil war” and lamented that “We lost our country, we shoulda held the capital.” Rehl added that he “was hoping we all sent a message yesterday, I guess that was the message to ben[d] the knee, its depressing.” Ex. 547-8. Through their actions, Rehl and his co-conspirators sought to send a message—to use their force to influence and intimidate the government to obtain their desired political outcome.

Rehl committed a crime of terrorism on January 6, and the Court should not hesitate to impose a sentence that reflects the seriousness of the crime and its threat to our nation—as reflected in the Sentencing Guidelines.

B. Rehl was a Manager or Supervisor Under Section 3B1.1

As a manager or supervisor of other individuals across the conspiracy to oppose the transfer of presidential power by force, Rehl deserves a three-level upward adjustment for his aggravating role in the offense. U.S.S.G. § 3B1.1(b). The PSR correctly applied this role.

Rehl was one of the operations leaders of the Ministry of Self Defense. The operations section was designated by Tarrío as an “upper tier” of MOSD leadership, and in the same message Tarrío emphasized that the section had a “top-down” structure. Ex. 503-18. Co-conspirator Jeremy Bertino explained that the job of the marketing section was to decide the mission they wanted to

accomplish, and it was the operation section's job to figure out how to accomplish that mission. Tr. 10012:4-14 (Bertino).

Rehl embraced and filled that leadership role. On January 6, Rehl led—along with Biggs and Nordean—the assembled Proud Boys who had gathered at the Washington Monument at 10:00 a.m. He led them away from the Washington Monument and towards the Capitol as the President was still speaking. Shortly after Nordean announced that he was going to begin developing the front line of that march, Rehl instructed those present to “make sure no press is around.” Ex. 1000 at 1:30-1:45. As Biggs and Nordean attempted to rile up their charges by referencing Bertino's stabbing and Tarrío's arrest, Rehl stood nearby, facing the men, radio in hand. Ex. 1000 at 4:09-5:49. He later used that radio to ensure that the back of the group stayed with the front of the group. *See, e.g.*, Ex. 1000 at 8:27-8:40; Tr. 17831:1-12 (Rehl). In addition to bringing his own radio, Rehl transported five additional radios to Washington for the group's use. Ex. 509-18. Rehl's leadership helped ensure that the group of nearly 200 men he helped lead away from the Washington Monument and towards the Capitol stayed at nearly 200 as it approached and circled the building.

During the march, Rehl maintained contact with his fellow leaders and provided updates to his co-conspirators monitoring what was happening from afar. Rehl assured other leaders that the MOSD members who showed up were “doing our thing” and staying together. Ex. 509-29. Rehl also reported to co-conspirator and fellow MOSD leader Bertino that there was not much Antifa presence, but that the Proud Boys were outed by the media almost immediately. *Id.*

After the group stopped for approximately 45 minutes at the food trucks for lunch, Nordean organized them into a column, and Rehl again led the men, with Nordean and Biggs, from the food trucks to the Peace Circle. *E.g.*, Ex. 1001 at 1:42 (Rehl and Nordean stopping the group with hand gestures). Rehl, along with Nordean and Biggs, was at the front of the column of Proud Boys who

changed the atmosphere at the Peace Circle from peaceful to rowdy. *E.g.*, Ex. 1001 at 4:18. As the MOSD leaders and their men surged forward towards rioters assaulting the police guarding the Pennsylvania Walkway, Rehl exhorted the crowd, “Fuck them! Storm the Capitol!” Ex. 1001 at 10:07.

When the time came to enter the building, Rehl led at least three of his men into the Capitol and into a Senator’s office. The men celebrated their group accomplishment and posed for pictures flashing the Proud Boys hand gesture.

After leaving the building, Rehl looked to celebrate the group’s achievements not with those he traveled with from Philadelphia, but with his fellow MOSD leaders. Rehl specifically asked where Biggs and Nordean were at 6:37 p.m. on January 6, and after Biggs told Rehl he had already left, Rehl lamented, “Ah shit forgot you had to roll, was hoping to have some celebratory beers with yall after this epic fuckin day, I’ll drink one for ya.” Ex. 509-37.

C. Rehl Obstructed Justice with his Perjured Trial Testimony

Rehl should receive a two-level upward adjustment for obstruction of justice under U.S.S.G. § 3C1.1. Rehl perjured himself no fewer than *15 times* in the course of his testimony regarding whether he assaulted anyone on January 6.¹ The commission of perjury is a clearly delineated basis to apply this adjustment. *Id.*, Application Note 4(B). On cross-examination, Rehl was confronted with undeniable video evidence that he assaulted law enforcement on January 6. He denied it. Before he realized what was coming, Rehl admitted that he wore a chevron-patterned gaiter, a black jacket, black goggles, and a camouflage hat with orange writing on January 6. Ex. 2003; Tr. 18394:22-18395:9 (Rehl).



Image 1: Ex. 2003, Rehl Circled

When shown a video of himself wearing this exact outfit and spraying at officers on January 6, Rehl suddenly could not tell whether that was him. *E.g.*, Tr. 18398:5-18400:19 (Rehl). Rehl continued to claim he could not see the camouflage hat or goggles in Ex. 2004, and—despite

¹ Tr. 17811:2-5; 17827:20-21 & 22-24; 17839:15-17 & 22-23; 18053:6-9, 10-11, 15-18, 19-21, 22-25; 18053:13-17; 18054:1-4, 5-8, 9-12, 13-17, 18411:10-15 (Rehl)

having been there—unequivocally denied assaulting any law enforcement (“I did not assault anyone”), even after having watched the video. Tr. 18411:10-15 (Rehl). He even denied being able to see that the person in the video had something dark in his hand. *Id.* at 18410:9-21.



Image 2: Still shot from Ex. 2004 showing Rehl with camouflage hat, hand extended, holding a black canister

Perhaps intending to rely on what he claimed was the blurriness of Ex. 2004, Rehl asked for a better angle. *Id.* at 18409:11-12 (Rehl). The government obliged that request. Just prior to being confronted with this second angle, Rehl’s answer about assaulting law enforcement changed from an unequivocal no to a conspicuous, “Not that I recall.” *Id.* at 18740:4-7 (Rehl). Rehl still would not agree to what was obvious to everyone in the courtroom, namely that the person in the chevron-patterned gaiter, black goggles, and camouflage MAGA hat was him. He instead claimed

that the attire of the person assaulting law enforcement was “close” to what he wore, and went as far as to glibly remark, “not saying that’s not me.” *E.g., id.* at 18741:1-16 (Rehl). It was him:



Image 3: Rehl, spraying at law enforcement officers

In the above screenshot from Ex. 2008, which was taken from a police officer’s body-worn camera, Rehl is depicted spraying a substance at law enforcement from the black canister whose existence he denied the day before. Rehl, the son and grandson of Philadelphia police officers, assaulted law enforcement on the West Plaza on January 6. He perjured himself about that fact 14 times on direct examination and once on cross-examination before claiming he did not recall and continuing to attempt to lie his way out of the hole he dug himself when confronted with irrefutable video evidence.

Rehl did not confine his evasive and/or incredible testimony to his assaults on law enforcement on the West Plaza. During his direct examination, he stated that he thought that the rioters committing the Peace Circle breach were just looking for stages—a statement so absurd that he was compelled to explain it to his own lawyer, “And, like, look, sorry – you’re giving me this look like – but it’s the honest God truth.” Tr. 17976:4-16 (Rehl). Rehl was evasive during cross-examination—on one occasion, he refused to answer a question six times. *Id.* at 18533:22 – 18537:25. On another, it took four tries. *Id.* at 18718:19 – 18721:6. Rehl testified that he ran his chapter to “make better men,” *Id.* at 17785:8-10, when in fact he was shown to be fast-tracking people he thought would crack skulls. *Id.* at 18483:12-17; 18679:17-23. Rehl testified that he sent a video with text he sent at 2:28 p.m. on January 6, “Civil war started,” in an attempt to say that he made the statement to mock the media. *Id.* at 18842:22-18847:9. The Cellebrite report of the forensic extraction of Rehl’s phone does not show that he sent *any* video along with the “Civil war started” text. Rehl Ex. 2 (partial extraction report showing the text with no accompanying file or trace of a file). He testified that after being able to sit down and go through his phone, he learned that January 6 was a “terrible day” and that he didn’t agree with what happened and did not want to associate himself with it, *id.* at 18847:13-19, 18848:7-23, but his contemporaneous messages belie that testimony. *E.g.*, Ex. 510-52 (Rehl informing MOSD members that he was “proud as fuck what we accomplished yesterday”); 544-3-4 (messages to Philadelphia Proud Boys executive board on January 7: “Looking back, it sucked, we shoulda held the capital. After trump conceding today, it all seemed like a waste . . . Everyone shoulda showed up armed and took the country back the right way”).

Rehl's obstructive testimony deserves a two-point upward adjustment under U.S.S.G. § 3C1.1, and for the reasons laid out below, it also augurs for a higher sentence under the factors laid out in 18 U.S.C. § 3553(a).

II. The 3553(a) Factors Support a Sentence Commensurate with the Terrorism Enhancement

The government's recommendation that the Court sentence Rehl to 30 years of incarceration is supported by the nature and circumstances of the offense (including Rehl's personal participation in the offense), his history and characteristics, and the need for general deterrence, as well as the need to specifically deter Rehl from committing future crimes.

A. The Nature and Circumstances of Rehl's Offense

The nature and circumstances of this offense are some of the most serious in our nation's history. Rehl and his co-conspirators led a conspiracy to prevent the peaceful transfer of Presidential power by force. This Court has described the effort by these co-conspirators as a "conspiracy to effectively steal one of our Nation's crown jewels: the peaceful transfer of power." *United States v. Pezzola*, 531 F. Supp. 3d 139, 149 (D.D.C. 2021) (Kelly, J.). The jury's verdict establishes, beyond a reasonable doubt, that the conspirators intended to steal that crown jewel corruptly and by force.

Rehl deliberately used violence to recruit members of the Proud Boys and tied that violence to attempts to overturn the election. He led a fighting force to the Capitol on January 6, 2021, and he directed that force against those he had previously called "traitors" deserving of "firing squads." Ex. 602-29. Rehl had closely followed the post-election litigation and knew precisely the solemnity and importance of what was occurring in the Capitol on January 6, 2021. When, in Rehl's view, the Constitution had not "done its thing," it was time to be violent. *See* Ex. 602-33. Rehl denigrated the very police whose lineage he claims to be a part of, imploring other rioters to "Fuck [the U.S.

Capitol Police]! Storm the Capitol!” After crossing the trampled police line and charging up the Pennsylvania Walkway, Rehl yelled at the police guarding the next set of barricades. Ex. 417x. He watched, gleefully recording, as rioters clashed with police, leading to Pezzola stealing a riot shield. *See, e.g.*, Ex. 229x, 444-Ax, and 1108-30; Tr. 12356-363 (Miller). He recognized that police and rioters were at a “standstill,” Ex. 547-5, and shortly thereafter assaulted law enforcement who were trying to prevent rioters from breaking that standstill by spraying them with an irritant spray.

Rehl entered the building and went immediately to a private office that included maps of Oregon on the walls, where he smoked and posed for pictures while flashing the Proud Boys hand gesture. Tr. 12639:16 – 12640:24 (Miller); Ex. 415x and 402-B. After he left the building, he again posed for celebratory photos on the Upper West Terrace while flashing the Proud Boys’ hand gesture. Ex. 401-CC; Tr. 12691:9-11 (Miller).

After January 6, Rehl alternated between celebrating the conspiracy’s success and lamenting that it had not gone further. Examples include:

- January 6, to his mother: “Seems like our raid of the capital set off a chain reaction of events throughout the country. i’m so fucking proud.” Ex. 557-29.
- January 7, to MOSD Members: “I’m proud as fuck what we accomplished yesterday.” Ex. 510-52.
- January 7 to a text chain that included Proud Boys, “We lost our country, we shoulda held the capital,” continuing that he “was hoping we all sent a message yesterday, I guess that was the message to ben[d] the knee, its depressing.” Ex. 547-8
- January 7, in a private message with a Philadelphia Proud Boy, Rehl said he was working on the next move. He later deleted that message. Rehl Ex. 3.
- January 7, to a fellow member of the Philadelphia Proud Boys executive board: “yup,” in response to a statement that they “should have let them finish the counting and when they didn’t accepted the challenges, Rush in and set fire to that shit.” Ex. 544-3.

- January 7, to the Philadelphia Proud Boys executive board: The reason why it feels like a waste is because instead of all these politicians getting scared and realizing they need to answer for this fraud, they are all turning on Trump and cucking, they are doubling down on their actions. Everyone shoulda showed up armed and took the country back the right way.” Ex. 544-4.

Rehl led an army to attempt to stop the certification proceeding, was proud that they got as close as they did, and his only regret in the immediate aftermath was that they did not go further.

B. Rehl’s History and Characteristics

Zachary Rehl joined the Proud Boys in 2018, having served in the U.S. Marine Corps and earned a Master’s degree from Temple University. Rehl PSR ¶ 157; Tr. 18460:16-18. He soon thereafter recognized that the members of the group were ready hit the streets, with Rehl leading the way, Ex. 560-2, and just one year later had recognized that violence was not detrimental to his political aspirations for the Proud Boys, so long as that violence was not “all they were about.” Ex. 561-1. He soon thereafter looked to get his men “jacked” and fast-tracked one who was ready to “crack skulls.” Ex. 560-4 and -5. By November 2020, as detailed above, Rehl was using violence to recruit and glorifying that violence as it relates to attempts to overturn the results of the 2020 Presidential election.

Neither the defendant’s time in the military nor his educational credentials, nor his lineage from the Philadelphia Police Department, prevented him from weaponizing a fighting force against the government on January 6, 2021, nor from participating in that violence himself. That they did not prevent the defendant from taking the actions he did weighs in favor of a lengthy sentence of incarceration.

Rehl’s criminal history likewise supports a significant sentence here. In 2006, Rehl was convicted of a DUI, which involved colliding with another vehicle, damaging that vehicle and injuring its driver. Rehl PSR ¶ 128. Rehl was convicted of a second DUI and Reckless

Endangerment in 2015. That offense involved an intoxicated Rehl accelerating his vehicle in the direction of the victim, with whom Rehl had had a prior dispute, while yelling slurs at him. In the process of doing so, Rehl hit two parked cars and pushed them in the direction of the victim. *Id.*, ¶ 129. Whatever substance abuse issues may have led to Rehl's two DUIs, including one in which he used his car as a weapon and was fortuitous to strike other vehicles before his intended target, appear to still have been ripe in 2021. Rehl used ecstasy and LSD through his arrest, *id.*, ¶ 154, his messages frequently referenced the use and distribution of cocaine, and he testified at trial that he got "lit" after protests, and that he was doing shots on December 30, to "pregame" and get his "tolerance up a little bit" for New Years Eve. Tr. 17813:15-21; 17880:10-17 (Rehl).

C. Adequate Deterrence and Protection of the Public from Rehl

As this Court recognized from the outset of this case, the election may be over, but all politics is not. Free and democratic elections are a bedrock principle of this country, and a significant sentence furthers the legitimate goals of general and specific deterrence of political violence. An organized assault like the one led by Rehl cannot simply be treated like all other crimes on January 6. By intentionally and systematically recruiting those who were willing to engage in violence, and then overwhelming officers with their force, Rehl and his co-conspirators re-established the outer limit for political violence. Any individual or group that would consider an organized attack on our government in the future must know that these are crimes that will result in a significant prison sentence.

There is likewise a need to deter Rehl individually. As noted above, Rehl did not come to his willingness to engage in violence against the government overnight. It has been building since at least 2018, and it built to a crescendo from November 2020 to January 2021. Rehl did not rest

on his laurels in the aftermath of January 6, but instead lamented how rioters had not gone far enough and told others that he was planning next steps.

Rehl has given multiple interviews after the jury's verdict, and those interviews have spread misinformation about what happened in the trial. For example, in an interview published in *The Gateway Pundit* on August 3, 2023, Rehl stated, "These trials have no transparency, especially ours. Ours was blacked out." See <https://www.thegatewaypundit.com/2023/08/j6-political-prisoner-zachary-rehl-faces-10-12/> (last visited August 12, 2023). As the Court is well aware, Rehl's trial was public and received a significant amount of media coverage, including two journalists live-tweeting nearly every witness's testimony and most legal arguments that occurred over the 4-month trial. Rehl's willingness to continue to spread misinformation, to stoke unjustified anger among those who read his words, show that, far from being contrite, he continues to engage in the same type of behavior, even after being convicted and even while awaiting sentencing.

Rehl has compared the prosecution, in a post-trial interview on May 12, 2023, to something that would happen in Communist China or Cuba. Rehl Ex. 4 at 19:25-20:05.² He also called the trial "one-sided" before saying he did not want bash the judge. *Id.* at 23:20-24:05). He has leveled accusations of a politically motivated jury, with unsupported claims of juror misconduct, *id.* at 21:24-22:50, and that the Court was reluctant to dismiss the case because of its high profile nature and the House Select Committee Hearings. *Id.* at 24:30-25:25. Rehl has in short blamed everyone except for himself for the situation he is in. Rehl's willingness to perjure himself on the stand, and his continuing to spread misinformation and attack the legitimacy of the conviction after trial

² Rehl Ex. 4 is an excerpt of a longer program that featured interviews and discussion among multiple people. Citations are to the time counter on the file itself.

demonstrates that the fact of being convicted alone will not deter Rehl from committing future offenses. The Court must incarcerate Rehl for a significant amount of time to both protect the public and deter Rehl from committing similar crimes in the future.