IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	CR No. 22-15-1
	)	Washington, D.C.
vs.	)	May 25, 2023
	)	9:39 a.m.
ELMER STEWART RHODES III,	)	
	)	
Defendant.	)	

TRANSCRIPT OF SENTENCING PROCEEDINGS
BEFORE THE HONORABLE AMIT P. MEHTA
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For the Government:

Kathryn L. Rakoczy
Jeffrey S. Nestler
Alexandra Hughes
Troy Edwards
Louis Manzo
U.S. ATTORNEY'S OFFICE
601 D Street, NW
Washington, D.C. 20579
(202) 252-7277
Email:
kathryn.rakoczy@usdoj.gov
Email:
jeffrey.nestler@usdoj.gov

APPEARANCES CONTINUED:

For Defendant Elmer Stewart Rhodes III:

Phillip A. Linder
BARRETT BRIGHT LASSITER LINDER
3300 Oak Lawn Avenue
Suite 700
Dallas, TX 75219
(214) 252-9900
Email:
phillip@thelinderfirm.com

James Lee Bright
3300 Oak Lawn Avenue
Suite 700
Dallas, TX 75219
(214) 720-7777
Email: jlbrightlaw@gmail.com

Edward L. Tarpley, Jr.
819 Johnston Street
Alexandria, LA 71301
(318) 487-1460
Email: edwardtarpley@att.net

Probation Officer: Crystal Lustig

Court Reporter:

William P. Zaremba
Registered Merit Reporter
Certified Realtime Reporter
Official Court Reporter
E. Barrett Prettyman CH
333 Constitution Avenue, NW
Washington, D.C. 20001
(202) 354-3249

Proceedings recorded by mechanical stenography; transcript produced by computer-aided transcription

P R O C E E D I N G S

COURTROOM DEPUTY: Good morning, Your Honor. This is Criminal Case Number 22-15-1, United States of America versus Elmer Stewart Rhodes III.

Kathryn Rakoczy, Jeffrey Nestler, Alexandra Hughes, Troy Edwards, and Louis Manzo for the government.

Phillip Linder, James Lee Bright, and Edward Tarpley, Jr., for the defense.

We also have Crystal Lustig on behalf of the probation office.

The defendant is appearing in person for these proceedings.

THE COURT: All right. Good morning, everyone, and welcome.

So we are here for sentencing this morning. I presume everybody is prepared to proceed?

Okay. Let me just begin with a couple of open-ended matters from our hearing yesterday. I had left open a couple of legal issues concerning the enhancements that have been recommended by Probation, and I'd raise some legal questions about those enhancements.

The first concerns the three-level enhancement for substantial interference under 2J1.2(b)(2), and I had raised some questions about what the term "resulted in" means and

what that means in terms of the causation analysis.

I had sort of noted that it requires some degree of but-for quality to it, and I sort of left it open at the end of the day and said I would give it some more thought and I have.

I did receive the government's reference to an additional citation, the *United States versus George* from the Ninth Circuit. You know, it's actually an interesting case because it actually does confirm the fact that there is a but-for causation and proximate causation built into the resulted-in language that the Ninth Circuit, as it interpreted it.

And, frankly, I'm not sure the facts are terribly on point in the sense that there really wasn't any question that the defendant there was a but-for cause for the financial, additional financial hardship that those victims experienced. So I'm not sure it answers the question.

What I think does answer the question, however, is the Supreme Court's decision in *Paroline versus United States*, 134 -- I'm sorry. This is 572 U.S. 434. This is a case from 2014 that you all will probably remember that concerns the proximate-cause analysis under -- for the restitution purposes. And the Supreme Court sort of builds on its analysis from the *Burrage* case, which I mentioned yesterday.

And what the Court does is it does sort of start from the proposition that built in typically under criminal laws is the concept of proximate cause which includes both but-for cause; that is, factual cause plus some concept of legal limitation, including foreseeability.

What the Court says in *Paroline*, however, is that but-for cause essentially is the default. It is not the only potential cause analysis that a court can employ. And depending upon the circumstances, a less stringent causation analysis can apply.

The Court in *Burrage* had noted, for example, that in some cases, the criminal law recognizes that there can be multiple factors; but so long as a particular factor is a sufficient factor, that that would be enough to establish causation.

That's not what would apply here, because I don't think anybody would say that -- well, it's a tougher analysis to suggest that the Oath Keepers, even if I were to consider sort of co-conspirator liability on its own, were a sufficient cause, certainly for the length of time the proceedings were recessed.

However, there are, as the Court points out in *Paroline*, less-demanding causation tests endorsed by authorities on tort law. One prominent treatise suggests that when the conduct of two or more actors is so related to

an event, that their combined conduct viewed as a whole is a but-for cause of the event, and application of the but-for rule to them individually would absolve all of them. The conduct of each is a cause in fact of the event.

And, in fact, the re-statement provides this example of three people pushing against a car that tips over. No one person's force would be sufficient to tip the car over and roll off a cliff, but all three combined do. And the fact that any individual person by themselves couldn't tip the car over and cause it to go over the cliff doesn't absolve each person of causing the harm.

And I think that's exactly what we're talking about here. The Court goes on to say that these alternative causal tests are kind of legal fiction or construct. If the conduct of a wrongdoer is neither necessary nor sufficient to produce an outcome, that conduct cannot in a strict sense be said to have a causal outcome.

Nonetheless, tort law teaches that alternative and less demanding causal standards are necessary in certain circumstances to vindicate the laws' purpose. And in particular, in *Paroline*, that's exactly what the Court did, given the circumstances in that case.

The Court went on to say later on, "As the authorities the government and the victim cite show, the availability of alternative causal standards where

circumstances warrant is, no less than the but-for test itself of a default, part of the background legal tradition against which Congress has legislated. It would be unacceptable to adopt a causal standard so strict that it would undermine congressional intent where neither the plain text of the statute nor legal tradition demands such an approach."

So I think in light of those principles set forth there in *Paroline*, I think what the right answer is, is that this is a circumstance where the kind of strict but-for test is not required, and the Court is not required to follow it in order to carry out the purposes of the Sentencing Commission in this particular Guideline.

It should not be the case that because any particular person or group of persons' conduct itself is not the but-for cause or is in itself not a sufficient cause, that that person should then somehow be absolved of the additional three-level enhancement that is available under the Guidelines.

There's certainly nothing in the text of the Guidelines, and there's certainly nothing about the purpose of the Guidelines that would suggest otherwise.

So I think notwithstanding the fact that the term "results in" ordinarily carries a but-for cause meaning, I do not think it is one that needs to be strictly applied

here. And so for that reason, given how the Court has viewed the causation standard and how it can be applied slightly in a more relaxed way, depending upon the circumstances, I will conclude that the causation standard is met in this case in the circumstances that we are talking about; so, therefore, the three-level enhancement will be applicable in this and the other matters.

The other issue that was left open-ended yesterday concerned the participation or role in the offense enhancement. The government has asked for three or four points be added to various defendants. And the question as raised is whether, under the Circuit precedent, control is a necessary component of that analysis, and I think it is. Again, I think the Circuit precedent is confusing. Nevertheless, I am bound by it.

And even the decision that the government cited yesterday in Clark, which includes the concurring opinion by Judge Randolph, says, citing to a case -- *Clark* was a 2014 case. It cited to a case a decade earlier, *U.S. versus Smith*, for the proposition that "All persons receiving an enhancement under Section 3B1.1 must exercise some control over others."

And so notwithstanding the fact that the Guidelines identify control as but one element, the Circuit, at least in multiple cases, mostly recently in *Johnson*, has

said that control is a necessary factor. That may be wrong. It may require an en banc court to say otherwise.

I understand Judge Randolph's view that that language is dicta, but his is a concurring opinion, and I'm bound by what the Circuit has said consistently since 2004. So going forward, I will consider control to be a necessary factor in evaluating whether each particular defendant -- as to each particular defendant, whether the enhancement is warranted. So that resolves that.

And I think the final issue that I left open specific to Mr. Rhodes is with respect to the letter that I received from Professor McCord. I ultimately have exercised my discretion. I did review it and I did read it. And, obviously, it's -- the fact that Mr. Bright said that he would be ready to respond to it today gave me some greater comfort in being able to consider it, given that you've read it and are prepared to respond to it.

So that is, I think, all of the open issues from yesterday. Am I missing anything?

Oh, there is one other issue that I did not get to yesterday and I don't think I'm going to get to it today, and that is the issue of restitution.

Paroline is the case, and you all should read it, and it has some parallels to this case. It's a case, as you all may recall, involves a victim of child pornography

requesting restitution. And the Court was confronted with the question of, well, how much is an individual person who has viewed child pornography responsible for the total damage and harm that is caused to a victim of child pornography?

And it's in that context that the Court provided this various -- you know, this various analysis of the different types of causation and applied a lesser standard of causation to effectuate the purposes of the law.

That said, what the Court did not do, however, is to relax the standard so much that any particular person would be responsible for the whole of the damage.

And so it is not -- so there are some parallels, obvious parallels, to the facts of January 6th and the events of January 6th. It is different, however, in one important respect, which is that, unlike a situation involving a victim of pornography, child pornography, we can actually, in theory, specifically identify people who are responsible for injury and damage to property, which at least is the large -- is the portion of the restitution award, at least as I understand the government has been asking for. It's the $2 million-plus damage to the Capitol for repairs, et cetera.

And so my question is to you all whether any restitution award with respect to the Oath Keepers and those

defendants is limited to the damage that potentially could be attributed to them in terms of property damage. And that would be to the East Capitol doors -- excuse me -- to the Columbus Doors and those other doors, based upon the convictions and perhaps the preponderance-of-the-evidence standard as it relates to those who were acquitted. If that's the high end, then the question becomes: What portion are they responsible for? Because I don't think they can be responsible for all of it because, as we know, there were many people that went through that door that day.

And so I can't remember what the total cost of it was. I think it was north of 40-. But, you know, just doing simple math and what you all have requested, $2,000 per defendant is going to get us well north of 40-. And so I think we're going to have to use a more-nuanced approach -- maybe I'm wrong about all of this, but this is just my -- I'm just sharing my thoughts with you about what, if any, restitution award is appropriate.

We don't need to resolve that today. Statute permits me 90 days in which to consider a final award of restitution. So we can put all of that on the back burner for now, although I assume we will actually need to deal with it sooner than later because, essentially, Mr. Rhodes' sentencing starts the clock for everyone else. So we'll have to get that resolved within the 90 days of, it's either

this sentencing or when judgment gets entered. Either way, you get the point.

All right. So I think that resolves the outstanding issues from yesterday. And am I missing anything before we continue?

MS. RAKOCZY: Not from the government's perspective.

MR. BRIGHT: Not from the defense's perspective.

THE COURT: All right.

So let me just give you a preview of how we're going to proceed today.

I'll go over what I've received and reviewed from the parties. I'll ask defense counsel to confirm for me that Mr. Rhodes has reviewed the Presentence Investigation Report.

I then will turn to the factual disputes that have been raised by the defense with respect to the Presentence Investigation Report and go through some of that.

And then I will hear argument from the parties as to two issues, both the question of what the joint -- the scope of the jointly undertaking of criminal activity should be -- that is, the offense conduct that ought to be attributable to Mr. Rhodes -- and any factual arguments concerning applications of the Guidelines that you might wish to make at that point.

I will then rule -- I will provide you with the Guidelines calculation as I see it after I've heard your arguments, and then we will move to the allocutions.

After that, we will conclude with Mr. Rhodes.

And then we'll proceed with my final sentence.

And so that'll be the basic structure for all of these sentencings as we move forward for the government's benefit.

Okay. So let me just recite for the record what I have read and reviewed with respect to Mr. Rhodes.

There is the Presentence Investigation Report at 548; the Probation Office's recommendation at 549; the government's memorandum in aid of sentencing, which is -- you all would know what number it is -- the defendant's memorandum in aid of sentencing at 570; and the defendant's objections to Presentence Report at 537.

I've read the McCord letter, and there was also an additional letter submitted by somebody by the name of Brian Hill, which I've read as well. That's now been posted to the docket.

And I should add that I've also reviewed -- I can't say I've read every word, but I've reviewed most of the exhibits that the government has presented in support of its memorandum. So with that, am I missing anything?

MR. BRIGHT: I don't believe so, Your Honor.

That's pretty thorough.

MS. RAKOCZY: No, Your Honor, nothing from the government.

THE COURT: Okay.

All right. So, Mr. Bright, can you confirm for me, or Mr. Linder, confirm for me that Mr. Rhodes has received and read and had an opportunity to review the Presentence Investigation Report?

MR. BRIGHT: We have had the opportunity to provide him with a hard copy. And we have had multiple opportunities, whether it be via Zoom or phone calls, to review the PSR with him, sir.

THE COURT: Okay. Thank you, Counsel.

All right. So, look, I think this is -- all of these cases are unusual in the following collective sense when it comes to the PSR and the facts. You know, there are a lot more factual concerns or disputes raised about the facts.

Truth be told, I don't know how essential it is for me to go section -- paragraph by paragraph and respond to the defense's objections and either agree with them or overrule them. I've obviously sat down through three trials and have a pretty good grasp of what the factual landscape looks like.

But I do think it's probably important that I at

least address the major categories of factual disputes that the defense has raised. So let me at least just do that for purposes of the record. And then ultimately whether I ask pretrial to make some changes to the Presentence Investigation Report, I'll just have to reflect on a little bit.

So the first general sort of category of objection from the defense is that the evidence showed that there was no conspiracy to oppose the transfer of power after the election. That is, of course, inconsistent with what the jury found, and what the evidence, as I have concluded yesterday at the Rule 29 hearing yesterday, showed.

Just by way of example, there are multiple messages from Mr. Rhodes espousing the need to keep President Biden out of office because he believed that there were constitutional improprieties in the election. For example, on December 13th, Mr. Rhodes expressly disclosed his intent to prevent the President, now President, from taking office.

He was asked by Greg Smith on a text message with Kellye SoRelle and others, "Stewart, just to clarify, any initiative on the Insurrection Act will include steps to prevent Biden or Kamala from taking the oath, right? My sis says, 'Yes.'"

To which somebody named Dave Roberts adds, "What

is Biden's recourse, if any, under that scenario?"

And Mr. Rhodes responds, "Yes, of course, Biden and Kamala would be prevented from being sworn in. They'd be arrested and should be the first to be indicted. You can't let traitors and Communist puppets who were never duly elected be sworn in."

December 14th of 2020, Mr. Rhodes says to the "GA OK General Chat", "If he doesn't use the Insurrection Act to keep a Chi-Com puppet out of the White House, then we will have to fight a bloody revolution/Civil War to defeat traitors."

The prior text was Government's Exhibit 6701. This one is Government's Exhibit 6803.2. These are just illustrative. I do not mean to suggest that these are exhaustive recitations of evidence to support or refute, I should say, the objections that are made about what the evidence at trial showed.

There was also the general objection that the QRF was not an offensive force; rather, it was a force that would be called upon in the case of an emergency or invocation of the Insurrection Act. The defendants have described the invocation of the Insurrection Act as a condition precedent to the use of those weapons.

It is certainly true that multiple witnesses testified that the QRF, at least in their view, was meant to

be a reactive force. And that would include John Zimmerman, who had testified that -- his understanding that it would be used if Trump also invoked the Insurrection Act. But I think there was compelling evidence from which a jury could have concluded otherwise.

December 29th, 2020, Mr. Rhodes says to Kellye SoRelle, "This will be D.C. Rally No. 3. Getting kind of old. They don't give a shit how many show up and wave a sign, pray, or yell. They won't fear us until we come with rifles in hand."

That's Government's 6749.

January 10th -- this is after the 6th -- there's the recording of Mr. Alpers, which is Government's 1202.5. Mr. Rhodes says, "Maybe, but it has also showed that the people -- it also showed people that we got a spirit of resistance, so him letting you know my only regret is that we should have brought rifles. I tell you what. If President Trump is going to do the right thing, then I agree it was the wrong thing to do. If he's not going to do the right thing and he's just going to let himself be removed illegally, then we should have brought the rifles. We could have fixed it right then and there. I'd hang fucking Pelosi from the lamppost."

Mr. Alpers simply says, "No."

There's also Mr. Dolan's testimony showing a

willingness by late December, according to him, to take up arms to fight back and, as he explained it -- as he explained it, to engage in government-on-government fightings, pro-Trump versus pro-Biden factions, from which a jury could have concluded -- and I do conclude -- that the QRF was not simply meant to be a reactive force or one that was going to be called in based upon a conditional -- condition precedent of the Invocation Act's -- Insurrection Act's invocation.

There's the contention that Mr. Rhodes and others' statements about coming in with rifles in hand, Civil War/revolution was bombast and not evidence of actual intent of the use of force. The jury concluded otherwise, and so do I.

There was compelling testimony from Mr. Dolan, Mr. Young, and Mr. Berry at the second and third trials, all of whom testified that they shared a common understanding with others that they would be called upon potentially to use force on January 6th up to and including the use of firearms. There are plenty of chat messages and -- chats and messages that otherwise corroborate those beliefs, particularly Mr. Rhodes' belief that the violence and force would be necessary.

The contention has been made that Mr. Rhodes did not call others to the Capitol and did not direct Mr. Meggs

into the Capitol.

I think at least the first part of that is certainly inaccurate. There are multiple messages from 2:24 p.m. to 2:41 p.m. to Mr. Meggs directly or to the "D.C. Op Jan. 6" chat instructing members to come to the south side of the Capitol while people are moving into the Capitol building.

Notably, Mr. Rhodes had said, "Come to the south side of the Capitol on steps, south side of the U.S. Capitol. Patriots pounding on doors."

It may be that Mr. Rhodes' cardinal directions were off, but I daresay the location that he asked people to come to near steps, on steps, and pounding on doors was exactly where people ended up on the east side. I don't think it's a coincidence that Line 1 and Line 2 came to and entered through the exact same place 30 minutes apart.

The defendants -- the defendant has pointed to Mr. Greene's testimony as evidence that he did not direct Mr. Rhodes to -- excuse me -- direct Mr. Meggs to enter the building. I'll address that in short order.

But I'll just note about Mr. Greene's testimony at Mr. Rhodes' trial, his actual testimony is he did not recall a three-way call with Mr. Meggs and Mr. Rhodes. He did not deny that there was any order given. He simply said he didn't recall any such phone call.

Defense also points out that the gun purchases were legal. That is true, but it misses the point. I think the preponderance of the evidence, and certainly clear and convincing and beyond a reasonable doubt, a jury could find and did find that Mr. Rhodes' purchases of firearms, both on his way to Washington, D.C., and on his way out was to challenge the Government of the United States and to create an arsenal in order to do so.

Mr. Rhodes' own words have established as much. I've already recited some of them. And I will also note that on the way back, Mr. Rhodes gave a cache of weapons and equipment to Josh James, which he told Mr. James to distribute upon his instruction and to be prepared for violence in the event of Civil War.

Mr. James admitted to that in his factual proffer when he plead. It is something I can consider. He said that happened under oath; and, therefore, I credit his statement that Mr. Rhodes said that to him when he distributed weapons to him after January 6th.

There's the contention that Mr. Rhodes' text message or his Signal messages to others in the "Old Leadership" chat to tell others to delete their messages was simply reciting or passing on the advice that Kellye SoRelle was providing.

Let me just say I find that to be -- it really

doesn't pass the laugh test. Mr. Rhodes is a Yale graduate, who for years, as we all know, practiced criminal defense work. And I find it hard to believe that Mr. Rhodes thought he would need to accept legal advice from Ms. SoRelle about how to behave in the aftermath of January 6th and in terms of what advice he was giving to others about the deletion of messages that could implicate him and other Oath Keepers.

Just a few other notes that are raised that Mr. Rhodes' conduct was all protected speech and that his speech did not incite violence or emit violence.

The latter half is certainly true under the *Brandenburg* standard. The former is not. Mr. Rhodes' speech in furtherance of a seditious conspiracy is not protected speech. That is well settled. His speech in furtherance of a criminal conspiracy is not protected speech. That is well settled.

Finally, the contention is made in the memo that much of what Mr. Rhodes said was about resistance after President Biden took office. I don't know that makes it any better, even if it were true, but it's not.

And as I said, some of the earlier examples that I provided make clear that part of Mr. Rhodes' intention, as the jury found, was to prevent President Biden from taking office through violence. And there was ample evidence from which a jury could so conclude, and there was evidence from

which I conclude as well for purposes of making factual determinations.

Okay. With that, that's out of the way.

All right. Let me now turn to the next order of business, which is, I'm happy to hear arguments from either side about both scope of related conduct and application of any particular Guidelines if you'd like to be heard.

MS. RAKOCZY: Yes, Your Honor. Thank you.

The government would like to begin with, I think, the "scope of related conduct" question. That makes sense as it applies across the various Guidelines, the specific offense characteristics, and adjustments that we're asking this Court to apply.

The Court is well-aware that in the definition of "relevant conduct" under Section 1B1.3(a)(1)(A), relevant conduct encompasses both the defendant's acts and those the defendant aided and abetted, counseled, commanded, induced procured, or wilfully caused.

And under Section 1B1.3(a)(1)(B), also in a jointly undertaken criminal activity, such as a conspiracy, a defendant is responsible for all acts of others that were "within the scope of the jointly undertaken criminal activity in furtherance of that activity and reasonably foreseeable in connection with that criminal activity."

And, finally, just in considering the definition

of "relevant conduct" under Section 1B1.3(a)(3), a defendant's relevant conduct under the Guidelines includes "all harm that resulted" from the defendant's acts or the acts of the others who were engaged in that jointly undertaken criminal activity.

So we don't need to get to this issue completely today. But just to preview some of the hearings that will follow in the comings days and week, I think it's the government's position that while, as a matter of law, the relevant conduct is not necessarily or the scope of the conduct is not necessarily coterminous with the goals or the scope of the conspiracy, for these nine defendants, it is the government's position, as you saw in our memorandum, that each of these defendants engaged in that jointly undertaken criminal activity and that the acts that form the factual basis for most of these adjustments and specific offense characteristics do constitute reasonably foreseeable actions as part of the conspiracy.

And so we do believe that the relevant conduct encompasses for each defendant all of the acts of the co-conspirators in this particular case. And there may be well conspiracies where it's unfair because somebody purely only joined the day of and really could not have foreseen the full scope of the conspiracy.

We have later joiners here. But it's the

government's position that everything that happened that supports factually the SOCs and the adjustments in this case is something that was reasonably foreseeable as part of this jointly undertaken criminal activity.

But with Mr. Rhodes, it's, of course, a much easier question. He is the leader of this conspiracy. And the Court discussed very extensively yesterday how Mr. Rhodes exercised control over this conspiracy; how he instigated the conspiracy; and for particular issues like whether he knew and/or encouraged the ultimate breach and attack on the Capitol, the Oath Keepers' participation in the attack on the Capitol on January 6th.

This Court has made strong findings of fact yesterday in the Rule 29 findings that Mr. Rhodes both implicitly and arguably, a jury could have found, explicitly directed both Line 1 and Line 2, Stack 1 and Stack 2, to enter the Capitol that day and to participate in the attack on the Capitol and the obstruction of Congress.

So for that with respect to the eight points for the threatening to cause harm to others or damage to property, we think somebody who orchestrates and leads a seditious conspiracy beginning in the weeks -- days or weeks after the election, to use force to stop the lawful transfer of Presidential power, particularly someone who is aware of and facilitates and advocates for a Quick Reaction Force, an

armed force to be on the outskirts of D.C. to support that mission, and then the Court has found, implicitly and/or explicitly, directs a group of 14 people in the first group and 5 or 6 in the second group to go up those steps and participate in breaching the building, wearing paramilitary gear, and armed with, some of them, some level of weapons, we think Mr. Rhodes' role in that, clearly, at least threatened harmed to others and property damage, if not directly caused it.

So we think that it's not a challenging question for Mr. Rhodes for the plus eight specific offense characteristic under 2J1.2(b)(1)(B).

I'm not sure if the Court had any further questions about that point for the government.

THE COURT: No.

MS. RAKOCZY: With respect to the specific offense characteristic of the offense resulting in the substantial interference in the due administration of justice, this Court has articulated essentially where we are on the standard now.

We think that that standard has been echoed, incidentally, in slightly different ways by some of the judges in this courthouse.

Just for the record, I think then-Chief Judge Howell in the *Rubenacker* case, the

sentencing transcript around page 78 found essentially that acknowledging that there is or may be a but-for causation standard, found essentially that it was impossible to think that somebody who knowingly and actively joined in this riot in an attempt -- the jury found an intent to obstruct the proceeding or in this case perhaps under conspiracy theory, conspired to obstruct the proceeding, it's essentially ludicrous to find that that person would not have been a -- contributed in the causal chain in a but-for way to the conduct that ultimately resulted in the substantial administration -- substantial interference in the due administration of justice.

And we would remind the Court that that is one of the factual avenues to find that this applies. There is, of course, the vast expansion of government resources that was necessary to follow in the adjudicatory and investigative efforts that followed.

And even if you have to look at Mr. Rhodes' conduct in a vacuum, he led a conspiracy of, we think the facts support, more than 30 individuals, a seditious conspiracy to oppose the lawful transfer of power, roughly at least 20 of whom actually participated on January 6th in the attack of the Capitol. And that caused the FBI to have to open cases across probably 20-something different field offices throughout the country. The government had to

expend attorney resources, reassigning attorneys from other areas to investigate and prosecute these cases. This Court and the government have had to expend resources to preside over and prosecute about six months across three trials. The daily transcripts from Mr. Zaremba alone have probably constituted a substantial expenditure on the part of the government.

And I think if you compare this to something like the case of *United States versus Ali*, which we cite in our, I think, opening memo, possibly our reply, which is a Seventh Circuit case, 864 F.3d 573 at 574, Judge Posner there noted that in that particular instance, the involvement by various agencies who worked through the night amounted to a substantial expenditure, various law enforcement agencies, notwithstanding the government's failure to provide cost estimates in that case.

THE COURT: Can I ask you, though, it seems maybe a little bit too much to say that the expenditure of government resources can be calculated by the cost of the prosecution, as opposed to the cost to rectify the obstructive conduct.

Now, that may not make a difference here. But, I mean, it seems overreach to me to say, "Well, you know, it cost the government X to then prosecute for the obstructive conduct," as opposed to what -- *Ali*, for example, is a case

for which it was the cost to have to rectify the defendant's obstruction that the Court considered, which is different and often will be a far lesser expense.

MS. RAKOCZY: I suppose my response would be -- and this is just a factual, gut response, not one that is necessarily supported by the law, but I don't know how the government, law enforcement agencies, and the courts could not have launched an investigatory and prosecutorial effort after January 6th in light of what was rightfully perceived, I think, as an ongoing threat.

THE COURT: Right.

MS. RAKOCZY: And so I think that it does inherently follow that there will be, that there needs to be rectified by that investigative effort.

But I think even putting that aside, we put in our opening memorandum factual dollar amounts from the cost of all the agencies in the cleanup effort.

And I think, even putting that aside, the Court has record testimony from Special Agent Hawa of the United States Secret Service and Captain Ortega of the Capitol Police about just the monstrous effort to clear the building on the afternoon of January 6th and how hard that was and how many hours that took.

And that alone, there's no factual figure, dollar figure attached to that. But I think that's a little bit

similar in terms of what Judge Posner said, that there may not be a dollar amount here. But we think that that constitutes -- certainly that, even on its own, could constitute substantial interference.

So moving on then, I think, I mean, for us, the plus three for the extensive scope and planning is pretty clear for somebody like Mr. Rhodes who played the role he did in this offense. And the defense has not really extensively challenged that. And so I think moving on to the next issue that the Court may want to hear from us on is the leadership enhancement.

So understanding that the Court is looking for some evidence of control here, I think there are some -- I think the Guidelines address a little bit what "control" means. We cited some cases in our -- both our opening memorandum and, I believe, our reply brief on how hierarchy does play a role. It is not necessarily a dispositive factor, but it does play a role.

And it is our position, just sort of giving a preview of going forward, that all nine of these defendants did each play a hierarchical role here that might constitute a level of control that you are looking for here. Obviously, from for Mr. Rhodes at the top, he orchestrated and led the conspiracy. He also was the founder of the Oath Keepers and the leader or president for life.

You could tell from the way he acted and talked in the messages and evidence before the Court that he certainly perceived he was in charge.

And you also heard from witnesses in this case, particularly the cooperators, that they believed there was a strict hierarchy and sort of chain of command that they were following.

And we have specific citations to the transcript on page 47 of our opening memo; but Mr. Dolan talked about how he was part of a team that kind of reported up through Mr. Harrelson to Mr. Meggs to Mr. Rhodes.

Mr. Young testified that he was immediately subordinate to Joseph Hackett, who, in his mind, reported to Kelly Meggs, who reported to Stewart Rhodes.

And although not part of this case, in the third trial, in Case No. 21-CR-28, this winter, Bennie Parker testified that he was recruited by Jessica Watkins, who then provided them with instructions and equipment. And you could see in somebody like Jessica Watkins' messages with Mr. Parker that she's giving directions, for example, on whether guns or firearms can be brought.

And so there is very much here a sense of people looking for and listening to direction and command up the hierarchy here.

And I think, you know, as we get next week to some

of the others defendants, you will see similar things in the way that Mr. Minuta led the second group, in the ways that Mr. Vallejo brought the group from Arizona and took a little bit of a captain role in the QRF team that he led at the hotel, and the way that some other defendants as well were either incredibly active participants and sort of guided others in the conspiracy or, in the case of Mr. Caldwell, played an organizing role and helped people to know which hotel to stay at, where and whether to bring their guns.

So from our perspective, this is a leadership structure where some level of enhancement is appropriate across this case. There's a reason, you know, without getting too much into prosecutorial discretion, why the government put these nine people in this seditious conspiracy case as opposed to the others.

And part of that, I think the Court might surmise, has to do with the leadership role that they played, whether in an actual leadership role, being a state chapter leader or the head of the conspiracy, or being a particularly active foot soldier or somebody who commanded an aspect of the conspiracy like the arsenal at the QRF hotel.

But, again, for Mr. Rhodes, he is actually the leader. Witnesses who were lower in the chain described -- co-conspirators in the chain described feeling that he was the leader.

And Mr. Rhodes' own words in several of the statements introduced in evidence at Government's Exhibit 6701 explicitly stated Mr. Rhodes' view of the hierarchy chain. He talked about how the "D.C. Op Jan. 6, '21" chat was the thread for all leadership coming in from multiple states, together with the overall D.C. Op leadership. So he had this view that he was at the top; there were state or regional leaders; and then the rank and file under that.

He talked about designating Mr. Siekerman and Mr. Greene as being in overall command of the operation and then talked about people who would assist with leadership/coordination, such as Josh James and Kelly Meggs.

He would refer in another message to Mr. Siekerman and Mr. Greene as being overall Oath Keeper op leads and that anyone bringing a team can keep their team together under their immediate command, but Mr. Greene and Mr. Siekerman would be the overall leaders.

So these messages provide factual support for Mr. Rhodes' own view of the hierarchy, with himself at the top and then the op leaders and then the regional team leaders. And that also will inform, we think, the Court's view of whether some leadership enhancement is appropriate for others who are further down the chain of this conspiracy.

Mr. Rhodes also approved of aspects of the operation beyond just sort of the general goals and approach. When Mr. Meggs discussed with him plotting -- planning a QRF at the hotel, talking about the North Carolina team having his hotel for a Quick Reaction Force, the government introduced a message at Exhibit 6923 where Mr. Rhodes says to Mr. Meggs, "We will have a QRF. The situation calls for it."

It is clearly Mr. Meggs running an operational approach by Mr. Rhodes and Mr. Rhodes approving it, and that's yet another example of the control that Mr. Rhodes exercised over this conspiracy.

We would also note, Your Honor, just as the Court is thinking about these issues with respect to not only Mr. Rhodes but other defendants, that even if the Court finds that a defendant did not supervise a participant such that that adjustment applies, Note 2 of Section 3B1.1, so the Comment Note 2 of Section 3B1.1 observes that the Court may still want to upwardly depart for a defendant who "exercised management responsibility over the property, assets, or activities of the criminal activity."

And I think for some of the people who did not play a clear op lead role or chapter leader role, people who, for example, were team leaders of the QRF and controlled the firearms or people who exercised some

management responsibility over sort of less-experienced co-conspirators, I think those people, the Court might, even if it does not apply the adjustment for leadership because of a lack of actual concrete control, it may still find that it's appropriate to upwardly depart because of the management responsibility that they exercised over property, assets, or activities.

THE COURT: Can I ask you a question?

Is it the government's position and view that, at least if I'm -- with respect to the Guideline itself and the role enhancement, that in this case the enhancement must be either four points or three points or zero?

MS. RAKOCZY: That was our reading of the Guidelines. We had not had that understanding initially, but in sitting down to really --

THE DEFENDANT: That was my reading, too. I just wanted to confirm that.

MS. RAKOCZY: Yeah.

I would also just note in terms of giving the Court some support under the case law, the D.C. Circuit has considered, in discussing this issue of control, whether there is "a hierarchically superior relationship with subordinates."

And the Court clarified that the concept of control or authority is implicit in the notion of management

or supervision and that that connotes some sort of hierarchical relationship in the sense that an employer is hierarchical or superior to his employee; but you might also have situations that are less formal, where somebody is exercising management or supervision, which I think we would say is the case here. That case law is cited from United States versus *Quigley*, 373 --

THE COURT: That's the case that started all the problems.

MS. RAKOCZY: Yes -- F.3d 133. It's a D.C. Circuit case from 2004.

So, but, again, that notion of a hierarchy, we think all of these nine defendants kind of fit into that in some different way. I think that's part of the reason they find themselves in this case as opposed to the other case. And we'll talk more about that, though, at the individual sentencing hearings for others.

Does the Court want to move on?

I think the other main issue to address is the terrorism enhancement.

So I think the Court alluded to yesterday that it is challenging to find that in a case where individuals were convicted of participating in a seditious conspiracy to stop the lawful transfer of power after a United States Presidential election, that they plotted to use force in so

doing. It is very hard to not see that as terrorism within the definition certainly at least Note 4. That is certainly conduct that is calculated or intended to result in the coercion and intimidation of the government in order to achieve some purpose.

I think in this case, Mr. Rhodes' conduct as someone who, for weeks, if not months, orchestrated and then led this conspiracy, who repeatedly advocated for the use of force -- it was somewhat jarring even to the government to hear yesterday how often Mr. Rhodes used the word "fight" or force" or "bloody" or "Civil War" in that period from November 3rd to January 6th and beyond. When you read those quotes back to back, it really is quite alarming.

And they're just words, right? This is conduct because it was calculated and organized with actual planning, with the organization of an armed force, with the organization of other paramilitary equipment. It was calculated to intimidate and coerce at the very least the members of government and, on January 6th, the Members of Congress into stopping the transfer of power.

So from the government's perspective, Note 4(A) very squarely fits the conduct of Mr. Rhodes. It was an offense that was calculated to influence or effect the conduct of government by intimidation or coercion. Or there's an aspect of this as well -- or to retaliate against

government conduct.

I think, you know, as the weeks and months passed after the election and President Trump and others did not intercede, there is sort of an anger or retaliatory tone that Mr. Rhodes' comments take on. And I think that is -- I think the stronger argument is that the offense of this conspiracy was calculated to influence or effect through intimidation or coercion. But I think for at least Mr. Rhodes, there is an element of that retaliation that he was going for as well.

We disagree with Mr. Woodward's point yesterday. He's not -- I don't know if he's here today, so I don't mean to -- okay. He is. All right. Great.

So we agree with your point that.

THE COURT: Mr. Woodward is ubiquitous as far as I can tell.

MS. RAKOCZY: He does seem to be everywhere.

We disagree that this is a "12 or nothing." That is, just the plain language of Note A(4) [sic] does not say that. It seems as though the Court -- or the Guidelines, the Sentencing Commission was acknowledging that there might be conditions where some level of upward departure is appropriate, but this is -- we're not talking about a statutorily defined defense of terrorism.

So I think the Guideline really, by its plain

language -- and certainly no courts have supported Mr. Woodward -- or have supported Mr. Woodward's interpretation. We think that you can apply less than 12 levels. And, frankly, I think there is an argument to have been made that we did not make and we are not asking the Court to make that the full 3A1.4 might have applied. It doesn't require a conviction for, say, destruction of property.

And we think that, under all the evidence here, this Court might find by a preponderance that Mr. Rhodes' conduct and the relevant conduct of his co-conspirators did constitute a felony that involved or was intended to promote a federal crime of terrorism such as destruction of property.

But from the government's perspective, it's an argument we don't need to have today. And we're not necessarily thinking that under 3553(a), that a 12-level increase, plus the sort of maxing out of the Criminal History score, is appropriate to get to a sentence that would be appropriate under Section 3553(a).

We have articulated our reasons why, and I'll speak more at the end about why. We believe the sentence of 25 years is appropriate under 3553(a)., and we think here the six-level enhancement is half of the 12 that might have been applied for the terrorism enhancement.

We acknowledge and thought through in articulating six levels as -- we acknowledge that this group did not directly cause the loss of life. There's sort of a level of participation in the events that did cause the loss of life that day, but this is not blowing up a building.

I think organizing an armed force across the river that was prepared to come in comes pretty close to being pretty much like advocating for actions that could cause the loss of life. The repeated uses of how we need to have a bloody Civil War comes pretty close. And it is incredibly hard to forget the chilling words of Mr. Rhodes on January 10th that suggests that on January 6th, he was playing a little bit of the long game, but that were the President not to do something about calling up the Oath Keepers and literally starting a civil war, that his view was, "Actually, I should have called in the QRF on the 6th."

And I think when you're thinking about whether this was terrorism, which we believe it was, all of those factors suggest that something around the level of a six-level adjustment feels right.

This is terrorism. It's not blowing up a building directly or directing someone else to blow up a building. But certainly in light of the threat of harm and the historic significance of attempting to stop the

certification of an election for the first time in U.S. history, those facts together we do think provide a factual basis that supports an increase of roughly six levels.

I would just note in terms of whether levels can apply, we did cite a case in our opening sentencing memo, a District Court case out of Oregon, the *Patrick* case -- it's on page 67 of our memo -- where a court did something similar to what we're asking the Court to do here. So this is not unprecedented.

That case is still on appeal, so it hasn't been affirmed by the Ninth Circuit. We keep watching to see, but it hasn't been yet. But I think that provides an example that gives the Court some analogy here in support for doing what we are asking the Court to do.

So that's all that I think I have to say about Guidelines. I mean, I think at the end, depending on how the court goes on the Guidelines, I have some thoughts about why a sentence of 25 years is still both compliant with the Guidelines and appropriate. We provided some alternate justifications in our memo that I can address at the end, depending on where the Court winds up, but I don't think that's necessary now.

THE COURT: Okay. Thank you, Ms. Rakoczy.

MS. RAKOCZY: Thank you.

THE COURT: All right. I'll hear from the

defense.

MR. BRIGHT: May I ask a clarification question, Your Honor, briefly?

THE COURT: Of course.

MR. BRIGHT: When you were going into originally questions regarding the factual disputes that we had proposed and had in our objections and then did you intend for there to be any response to that, or were those your findings and then moving forward?

Because I think, as we -- as a defense team, as we divvy up tasks, if you will, the same as the DOJ does, some of the disputes regarding a couple of the issues that you had addressed have a substantial basis as to role adjustment and then also in terms of the response that we might have regarding the enhancement for Note 4 in that section regarding terrorism.

So what were your intentions, just to clarify, so that I know how we would be best proceeding, Your Honor?

THE COURT: Well, let's put it this way. Nothing is ever set in stone.

MR. BRIGHT: Certainly.

THE COURT: So if you want to address what I've said thus far and disagree with it, then I'm happy to think about it. So don't feel like what I've said thus far should preclude you from making any argument or allocution that you

intended to make.

MR. BRIGHT: Then with that being said, Your Honor, I'd like to address a couple of -- primarily one substantial objection that we would still have regarding a finding in the PSR. It is factual-based. And it has to do -- and would lend itself to whether or not ultimately there was a conspiracy that was fulfilled via Mr. Meggs going up into the building that day.

And it does -- I wanted to clarify our position on this, because I do believe, on behalf of Mr. Rhodes and our defense team, it would still speak to our -- even with due respect to the Court and to the findings of the jury, that there was no conspiracy as has been found. That's obviously Mr. Rhodes' stance and will be moving forward as well.

But I did want to address the issue regarding this phone call that has been made. And this is something that's been talked about all the way back to, I would say, January, late January, maybe early February when we had our re-hearing on Mr. Rhodes' detention before this Court. It was done via Zoom.

And I remember the Court at the time and your findings, Your Honor. I believe at the time -- and I don't want to try and quote. But my recollection regarding the wording that you had used is you found it at that time a bit implausible and troubling that there had not been a

communication that had occurred that would have then led Mr. Meggs to have taken that next step or taken into the process of going up to the top of the steps and joining Mr. Dolan and Mr. Harrelson that were already standing up there.

In addressing that, we would still dispute, for the record, that a communication and/or order was made by Mr. Rhodes at that time for Mr. Meggs to take that. That would, if our argument were to be true, undercut the concept that there was a conspiracy to go in and do the things that were ultimately done. Yes, I understand the government's clarified that they never intended for there to be a "plan" to storm the Capitol, a "plan" to breach the doors to do that. It was always clarified later as to the certification of the electors, the delay.

But I would respectfully suggest for the Court that the factual basis of our dispute is clear. And the testimony of the government, which they elicited also, we would argue, shows that that phone call, whether there was a good connection or not, and we heard -- ever had anything to do with Mr. Meggs ultimately going into the building, up the steps, and then going into the actions that ultimately happened.

I would point to the testimony of Jason Dolan. We've talked a lot about Mr. Dolan within the government's

183-page sentencing memo, which is very thorough. Multiple times they quote Mr. Dolan and cite Mr. Dolan as an honest man that, under oath, testified and used his testimony to make many points.

Well, Your Honor, if Mr. Dolan is to be believed, if his testimony is accurate, well, then he, along with Mr. Harrelson, having met Mr. Rhodes for the first time ever, communicated with Mr. Rhodes for the first time ever leaving the Capitol that day. He overheard, according to the government's elicited testimony, nothing that I got on cross, but what Mr. Nestler got on redirect. When he overheard Mr. Meggs tell Mr. Rhodes that he went into the building, it was Mr. Dolan's sworn testimony that Mr. Rhodes immediately looked at him and said, "That's pretty stupid." If we did not have any evidence or any testimony regarding that call other than that, then I would say this is still -- this is still an issue that's somewhat opened and disputed.

But what we do have is we have two other individuals that were part of the three-person call, so two-thirds of the participants, if it was one that was heard, if it was one that took place and connected. Mr. Michael Greene waived his Fifth even though he was under indictment; and he came in and testified for the defense, having not been here to here Mr. Dolan's testimony, having not been here to hear Mr. Rhodes' day-and-a-half direct,

cross, redirect. He wasn't here to hear what was said.

And Mr. Rhodes also said, admittedly after hearing Mr. Dolan testify, but his testimony was more explicit. He said -- and, again, I know we've had salty language in this court, but I do want to make things clear. Mr. Rhodes' testimony was: "That was pretty fucking stupid," having not heard Mr. Dolan's testimony, having not heard -- Mr. Greene --

THE COURT: Mr. Greene --

MR. BRIGHT: I apologize.

THE COURT: Mr. Greene said that.

MR. BRIGHT: Mr. Greene, having not heard Mr. Dolan's testimony, having not heard Mr. Rhodes' testimony -- and as the Court will recall, I turned over all of my notes from my witness prep for him. So had that been something I elicited from him, the Court would have been aware that that's something that I had discussed with him. That's something I would have turned over to the government, and that's why I did that out of an abundance of caution.

So the Court will also then remember that Mr. Greene independently testified he was standing next to Mr. Rhodes; and he also heard Mr. Rhodes, when informed by Mr. Meggs he went into the Capitol, "That's pretty fucking stupid."

None of us know. We can speculate. I get it.

The jury heard that. The jury made their decision. I will respect the jury decision but still disagree.

I think that the fact that independent witnesses have all said under oath that Mr. Rhodes' reaction to finding out Mr. Meggs went in directly contradicts the government's continued assertion that during that phone call, there was an order, a suggestion, or anything given to Mr. Meggs to go into that building, to interfere, and stop with the certification of electors.

Obviously, Mr. Meggs chose not to testify, as is his constitutional right. I respect that. But the actions and words of others, I would suggest, still dispute that that was part of what later became known, per the 28th witness of Graydon Young, that there was no plan; there were no words; there were no meeting of the minds. This was implicit.

And so I would respectfully suggest the basis of that because that does get into what Mr. Linder will talk about regarding role adjustment, is that it's our continued assertion, specifically regarding that factual issue, that we would dispute that that part of the conspiracy ever existed.

THE COURT: I remember the testimony well.

And I went back and looked at it in advance of the hearing, particularly Mr. Dolan's. It was a little bit more

equivocal than you've described. But, nevertheless, you have accurately captured what he heard Mr. Rhodes say with respect to the subject of having gone in.

I think the questioning was to the effect of: Did anybody chastise you?

And his response sort of unprompted, was, he said, "That was stupid."

And it wasn't particularly directed at any person, is my recollection of what Mr. Dolan said.

But let me ask you this.

MR. BRIGHT: Please.

THE COURT: Do you contend that Mr. Meggs was freelancing; that Mr. Meggs, who, if there's anybody in this saga seemed to adhere to the hierarchical quality of this organization, that Mr. Meggs would have done something as dramatic as lead half a dozen people or more into the Capitol building either without having been told directly by Mr. Rhodes that that's what you need to do, or with a full understanding that that's exactly what he wanted Mr. Rhodes to do; and combine that with the fact that as soon as that call ends, they head to the Capitol? And we know that both from the timing of the phone call and the video that was on Sandra Parker's phone, which showed a video of the line moving precisely when that phone call ended. It is -- it's possible that Mr. Rhodes either didn't connect or didn't

direct. But, man, that's a big coincidence.

MR. BRIGHT: I don't disagree with the Court. It is a big coincidence.

I think this is the type of issue that we have been struggling with for millennia: What perspective do we choose to see?

There are theologians that have talked about this. It's free will. What are you choosing to see on any given perspective of what you look at.

Christian theologian in the third century, Pelagius, said -- he used the example when he was having a discourse with Saint Augustine. He said, "We have free will." He used the eyes as an example. How do you choose to see things? That is your free will. What is your perspective?

Did the jurors have a natural inclination with a corrupted free will from everything that they experienced to look at that moment, choose that perspective and say, "Gosh, that sure is a hell of a coincidence. It must have happened"? I accept that can be a reality. But there's also the reality and what -- is what lead us here.

Matthew Peed, before my closing -- I had a closing written out. And Matthew Peed in the work room, he looked at me and he said, "You know what's an interesting thing about this case? 99.5 percent of the facts and the argument

that the government is presenting and that we're presenting and that we're all looking at, they're almost similar, they're almost identical. There's a slight variation. And it's -- the question is: How do you interpret that?

If I didn't have any evidentiary basis at all with how to view that phone call like we didn't have last January, I would concur with the Court, that it is troubling.

But when I have two out of the three participants independently testifying that no order, no suggestion was given, and then I have a government witness who his sworn testimony litters their sentencing memo as truthful, honest, and to be relied upon and then I have to sit and listen to him tell a jury that Mr. Rhodes admonished Mr. Meggs for going in, I go back to Occam's razor: What is more likely?

It is not likely. And if we go back and we watch that video in full, not the small snippets that the government presented, in full, what did Line 1 do?

Well, we know that Dolan and Harrelson were already standing up on roughly the 12th to 14th step. We see them crossing the grass, just wandering. They go up. There were no communications with other Oath Keepers with Mr. Rhodes for those two. How did they end up there if this is all based on orders in a phone call to Meggs.

Meggs and that group did not go up and then all of

a sudden start kicking the doors and go in. The doors were closed. They walk up in this, what has been talked about as this vaunted stack line. Well, my five-year-old does that in kindergarten. They went up. The crowd cleared for them. They didn't go up in a hurry, in an aggressive fashion.

Go back to the evidence just on this issue. I'm not trying to re-try this case, but this does speak to the concept of the conspiracy and role adjustment, and it's where we do have a consistent factual dispute.

The crowd parts for them. They calmly walk up. They take a left and they separate from each other. They're shaking hands with people, they're patting people on the back.

And then when you watch the full context of that, they start singing the National Anthem and talking. There's no aggressive action.

And then, unbeknownst to them, unbeknownst to anything that Mr. Rhodes ever could have ordered -- he's smart, but he's not prescient. Nobody ever could have predicted that that crowd on the east steps would have the Colombia doors open from the inside.

And then they start filing in.

As Jason Dolan said, it was a wedge and I got pulled through.

That's not even something that anyone ever could

have predicted. That's like going back to the election and having somebody predict that on December 19th, Trump would tweet out, "Be there. It's going to be wild," and all of a sudden Jan. 6th becomes this thing that they're aware of.

I would respectfully suggest and re-urge that the basis of that phone call has been completely misconstrued and misled.

Now, to your question of whether Mr. Meggs just sua sponte decided to go in and do that, I don't know, I'll never know. I have no idea. Nor does the Court, nor does the jury, nor does the government.

But I do know that whatever he chose to do, when it was reported back in the hierarchical fashion to Mr. Rhodes, that was something outside of the legitimate hierarchy, and he was admonished for it. And they then left the Hill and went back to Virginia.

So to clarify on that, I think that dovetails into what Mr. Linder would talk about in terms of the hierarchy and the control because I do think that actually speaks to, if there had been control, somebody did go, lack of a better term, "rogue." I think about 5,000 people on that day before Mr. Rhodes ever left the hotel where he was with Ms. SoRelle. They were going rogue on the west steps where there weren't any Oath Keepers. So for that point, I just wanted a clarification on the factual basis, Your Honor.

THE COURT: All right. Appreciate that, Mr. Bright.

MR. LINDER: Good morning, Your Honor. How are you?

THE COURT: Good. How are you, Mr. Linder?

MR. LINDER: Good.

One thing I want to follow up Mr. Bright, the coincidence you've indicated with the phone call and the actions of Mr. Meggs, one thing that nobody has talked about is: What did Rhodes do and what did Michael Greene do after the phone call?

If Rhodes -- I'll give you a hypothetical.

Rhodes is a military guy. Michael Greene is a military guy. If Rhodes -- there's 10,000 people descending on the Capitol. They can see it from where they're standing. If Rhodes told Meggs, "This is our chance. Go in and take over. Go stop the certification," don't you think he would have responded to Vallejo, "Bring in the guns. It's on boys. We're in"?

You've heard testimony. We heard evidence. And, again, we don't want to re-try the case. But we heard evidence that Rhodes was there for legitimate reasons also. I know the Court in its detailed recitation yesterday had some -- may have had some disputes with that. But there was evidence that he was there to speak and provide security for

different speakers.

THE COURT: Well, to be clear, what I said was that it wasn't the only reason.

MR. LINDER: Correct. Correct. But he was there for some legal reasons also.

And I think the evidence came out that he had about 30 people, 30 Oath Keepers at his disposal.

The evidence also came out that the Oath Keepers at one point had 30- to 40,000 members. If Rhodes wanted to stop the certification of the election illegally -- now, granted, he wanted to stop the certification by imploring Trump to invoke the Insurrection Act, which he could legally ask him to do. "Hey, go and do this."

But if what if the Court and the government or what the government is surmising is to be taken as truth, Rhodes being a military guy and having the friendship and acquaintance and the employment of Michael Greene, who's a military guy, if he'd really wanted to stop this certification illegally, like the government wants us to believe, why would there be guns outside of the District?

"Hey, we're going to go into the Capitol. We're going to go stop this certification illegally." They wouldn't have left guns outside the Capitol.

Rhodes had 30 people there already. But if he really wanted to do this, he could have had hundreds of

Oath Keepers there. And he didn't.

And so after this alleged -- or after this phone call with the government's theory taken in its most nefarious context of Rhodes ordering Meggs to go in and stop the certification or go in and disrupt or whatever he ordered him to do, if you take that as truth, the government's idea that that's what happened, don't you think Rhodes would have then followed up with calling other people: "Hey, group, get in here. You're off duty. We need to go to the Capitol. Vallejo bring in the guns"?

None of that happened because he's a military guy. So is Michael Greene. They would not send Meggs and a ragtag group of six people in to disrupt the certification without reinforcements, without some kind of organization.

Now, did Rhodes want the election [sic] to go forward? No, he didn't. We've talked about that, and the evidence is clear. But there were no orders or plans to go into the Capitol by the Oath Keepers that day.

And so kind of with that -- and I think if you -- so as Mr. Bright said, we have two of the three people on the phone call have denied an order being given. Dolan and Michael Greene talked about the admonishments they got -- that Meggs got from Rhodes when they got off or got out of the Capitol.

So the other bit of evidence that no one's talked

about until I mentioned it here today is: What did Rhodes do after this alleged phone call? Nothing.

He didn't call anybody else. He didn't go. He didn't order in the guns. Nothing. So that corroborates the fact that he didn't give an order. Being a military guy, if he had given that order, there would have been some follow-through.

So that goes -- and I'll keep this brief going forward. I think -- I want to clear this up. I'm looking, for the purposes of the record, at the presentence report for Rhodes. I've got that before me. And I think -- I'm looking at paragraphs 132, 133, and 135. I believed earlier that you went ahead and gave the three-point enhancement on paragraph 132. Ms. Rakoczy addressed it, but I believe that you'd said you'd already agreed that there was substantial interference with the administration of justice; is that correct?

THE COURT: Yeah.

I mean, I haven't formally said so but...

MR. LINDER: Okay.

I would like to kind of reiterate what I said yesterday on that, just kind of make a further record of it, that it all goes back to that phone call. So if you believe the phone call the way the government puts it, maybe, but there's this corroborating evidence; I don't think you can.

So the Oath Keepers weren't the ones who breached the Capitol. None of them destroyed any property. I don't believe any of them were charged with assault. I don't know about some of the other people.

But they didn't do a lot of stuff that the mob did. The mob was there first. Yes, some Oath Keepers went in. You can argue Stewart ordered it or he didn't. And the Oath Keepers who were in there were in there for 12 minutes.

So they didn't break doors, didn't break windows, didn't assault police, didn't destroy any property. So I would suggest that there is no substantial interference with the administration of justice by the Oath Keepers.

Now, mob, yes. And with other people, yes. But not the Oath Keepers. So that addresses 132. I just wanted to put that on the record.

Now, in regards to paragraph 133, the 2-point enhancement for extensive in scope, this also goes back to how you choose -- how the Court chooses to view the facts of this conspiracy.

The government in its indictment and the probation officer in this PSR allege that this conspiracy started in November. It was extensive in scope, several months in planning. But you heard the evidence. And the evidence, there was no J6 until December 19th. And it's very clear, undisputed that J6 wasn't even a thing until Trump made his

infamous tweet.

So if you limit the conspiracy, then it may not be extensive in scope. It depends on if -- he had access to hundreds of people. A dozen people went into the Capitol without his direction. So it depends on how you choose to look at it as to, is it extensive in scope or not?

The government's closing argument in both our trial and, I think, in trial 3 said that the conspiracy could be formed with a wink and a nod. Well, if the conspiracy was formed with a wink and a nod, then that's not extensive in scope.

So you've really got to parse through all of these things and say, which theory do you choose to believe, the theory that the government indicted our client on or the theory that they ended their case on in closing arguments? They're completely different. So that addresses 133, so don't think that two-level enhancement ought to apply.

135, the four-level enhancement for role in the offense. Yes, Mr. Rhodes is an organizer and a leader of the Oath Keepers. But in Line 2 of paragraph 135, you've got the words "criminal activity." So was Rhodes leading a criminal activity that day?

Our suggestion and the facts is that he was not. He was there legally. Yeah, he wanted the election to stop. He wanted Trump to invoke the Insurrection Act. But if he

didn't order his people in, if they were just there kind of watching like Rhodes was watching, then there's no real criminal activity there in regards to that.

So, yes, he is an organizer and a leader of the Oath Keepers, but was he engaged in a criminal activity as that applies? So that's all I'm going to do on that. I think Mr. Bright is going to address the terrorism enhancement with that.

But, Judge, it just goes back, it's a factually specific thing on what you really think of this phone call.

Thank you.

THE COURT: Okay. Thank you, Mr. Linder.

MR. BRIGHT: If I may be very brief, Your Honor. Again, I apologize if this seems a disjointed manner in which we're approaching you, but thank you for your time in hearing us out.

Merely on the government's request for the terrorism to apply, we would stand on previous objections. The clarifications in our arguments that we've made in the past ten-or-so minutes regarding the nature of whether there was a conspiracy, I'd correct Mr. Linder in a couple of things per Mr. Rhodes.

It was not that he wanted to stop the certification of the electors. There's clarification. And I believe later today you will hear from Mr. Rhodes in

continued clarification of that.

And it was the troubling closing of the Department of Justice in the Nordean trial whereby they were saying that conspiracy no longer requires the planning or meeting of minds or any of that; it can just be accomplished with an understanding, a wink, and a nod. I find it deeply troubling that that's where we're getting with this, and I think most Americans should be concerned as well. But that speaks to, also, the issue regarding the terrorism.

We would stand by the objections that we've made regarding that. We certainly understand the government's articulated argument before the Court on why that should apply. I would respectfully suggest for the Court to preserve a decision of that because I think there, even if the Court were to believe that Note 4 and the coercive manner that is discussed in that, it does say "may be warranted." It is certainly nothing that is required of the Court. It's a consideration the Court may choose to engage and decide.

And what I would respectfully say to the Court, aside from our objections as to its application, is that if the Court may be in consideration of that, as you seemed to indicate yesterday clearly, based on the concept of the conviction for seditious conspiracy, that perhaps the "may" is the part we should focus on and instead -- should not

focus on in terms of actually doing it, but reserve the punishment more appropriately that the Court will mete out within the proper factors of 3553, because I do believe, one, we'd stand by our objections; but, two, I do believe the Court can address, without the moniker of terrorism that the government wants clearly, but the Court still has the ability to issue a punishment that is going to fulfill all of the 3553 factors and be more than sufficient without a finding on that.

So I would ask for the Court, in its discretion, to reserve the punishment outside of that 3553 reasons.

THE COURT: Okay. Thank you, Mr. Bright.

MR. BRIGHT: Your Honor, if I may, again, I believe this will be the end of it. Mr. Tarpley had one thing he wanted to add.

THE COURT: All right. Your client has requested a break, so I don't know how long you're going to be.

MR. TARPLEY: Just a couple of minutes, Your Honor.

THE COURT: Okay.

MR. TARPLEY: Thank you, Your Honor.

I just wanted to cover a couple quick points.

On the day of January 6th, the House and the Senate were already engaged in a procedure which allows them to object to the election. And under the Electoral Count

Act, the Congress was governed by federal law which set out the procedure for the certification of the election and for the counting of the votes.

At trial, we had testimony from the former Parliamentarian of the House, who went into great detail on that.

And one of the things that he acknowledged in his testimony was that, at the end of the day, there was no way that anyone could have stopped the counting of the electoral votes, that based on the Electoral Count Act, there's a procedure set in place for the votes to be counted. If there's a break in the counting, they have to start back the next day and the next day and the next day after that until it is completed. And, Your Honor, I think we pointed that out in trial, and I think that testimony was elicited from the Parliamentarian of the House.

I just wanted to also further amplify the fact that there were no text messages, no chat messages, there was absolutely nothing introduced in evidence at trial from Mr. Rhodes indicating that he wanted to stop the counting of the electoral votes. There was never any evidence introduced about that.

And I know that the government's theory of the case is that this was all about stopping the transfer of Presidential power. And to be quite honest with you,

I don't think there was any way that anyone could have stopped the transfer of Presidential power.

The counting of the votes would have taken place under the Electoral Count Act and pursuant to the Electoral Count Act. And on January 20th, the President would have been sworn in because all of that would have taken place pursuant to the Constitution and to federal law that was already in place.

And there's nothing Mr. Rhodes or anyone else could have done to have stopped that.

And furthermore, it was never, ever in his mind to stop the counting of the Electoral votes, and there was no evidence ever introduced at trial to do that.

And so, Your Honor, I would just simply submit Mr. Rhodes, he was not a general on the battlefield directing his troops, as the government indicated in their opening argument. He was a man there committed to what he thought was doing the best thing to preserve liberty in this country, and that's what he was there for.

Did he plan for all this to happen?

No, he did not.

Did Oath Keepers go into the Capitol that day?

Yes, they did.

And we know from discussion that's already proceeded before Your Honor that he was aghast at what

happened, the fact that they entered the Capitol, because that was never a part of his plan either.

So, Your Honor, I would just simply ask the Court to reflect on the absolute impossibility that the transfer of Presidential power could have ever been halted or impeded in any way and that, pursuant to the Electoral Count Act, there was a procedure in place to make sure that the electoral votes would have been counted and they were counted.

Thank you, Your Honor.

THE COURT: Thank you, Counsel.

All right. Everyone, let's take 15 minutes. I'll be back at 11:15. Thank you very much.

COURTROOM DEPUTY: All rise. This Court stand in recess.

(Recess from 11:01 a.m. to 11:19 a.m.)

COURTROOM DEPUTY: This court is in session; the Honorable Amit P. Mehta presiding.

THE COURT: Please be seated.

Thank you, everyone.

Let me just do this in two steps.

First, I'm going to state for the record what I find to be the jointly undertaken criminal activity for which Mr. Rhodes is responsible for purposes of the then-Guidelines calculations.

Let me say at the outset two important issues or facts as a matter of background.

One, Mr. Rhodes stands convicted of seditious conspiracy, okay? We know the jury concluded what it concluded.

Two, the facts that I recited yesterday in support of the Rule 29 motion, I'm not going to recite those here again today; however, the record should clearly reflect that all of those facts and the inferences that I drew yesterday from those facts, I am finding by a preponderance of the evidence with one exception, which I will elaborate on momentarily.

So everything I said yesterday I'm incorporating into the record, finding those to be by a preponderance of the evidence and the inferences also by a preponderance of the evidence so that there may be no mistake about the details.

Now, that said, I'm just going to provide some broad strokes of what I think the evidence shows by a preponderance of the evidence and why I am coming to conclusion I am about the scope of the jointly undertaken criminal activity.

Mr. Rhodes was convicted of leading a conspiracy to oppose by force the lawful transfer of power following the 2020 Presidential election. The objects of that

conspiracy were to resist the authority of the United States Government with force, of which he was convicted, and to interfere with the execution of the laws governing the transfer of power, which I also find him to have been -- which I also find by a preponderance of the evidence, that is, that second objective that the jury did not reach because they weren't required to, I'm making a finding based upon my evidentiary rulings yesterday -- or the evidentiary summary yesterday and what else I'm about to say.

Because Mr. Rhodes' position atop the hierarchy of the Oath Keepers, as well as his conduct and actions and words, I find it appropriate to ascribe the actions of all other co-conspirators that constitute criminal conduct to him as well.

Those actions of his co-conspirators were both within the scope of the jointly undertaken criminal activity, they were in furtherance of the conspiracy, and, importantly, they were reasonably foreseeable in connection with the criminal activity. Specifically, and most critically, the evidence showed that Mr. Rhodes used violent imagery and language and drew comparisons between present day and the American Revolution and the Civil War to inspire the use of violence as a means of resisting the transfer of power to the new administration.

Signal messages and other means of communication

showed him persuading others and that other members of the conspiracy came to share this view.

Signal messages, other means of communications, and the actions of fellow co-conspirators showed that they had a mutual understanding that violence, including the taking up of arms, might be required to keep the President in office.

The evidence further showed that Mr. Rhodes knew that January 6th was likely their last chance to take a stand, and that, whether or not President Trump invoked the Insurrection Act, he and his co-conspirators had a common understanding that force might be used to oppose the transfer of power on January 6th itself, including directed at Congress.

There was further proof that he and his co-conspirators brought weapons to the area to be used, if needed, to carry out their objectives. The fact that those weapons were never brought into the city does not defeat the conspiratorial agreement to use those weapons for violence if they were needed or Mr. Rhodes' responsibility for the bringing of those weapons and the consequences that followed.

And, importantly, there was ample evidence of consciousness of guilt to support the fact that Mr. Rhodes was aware, not only of his own actions and was seeking to

cover the tracks of his own actions, but those of his co-conspirators as well. Why else would he have, within 48 hours, told everybody on that chat, the "Old Leadership" chat, to delete their messages and told everyone else to "Shut the F up."

There was one and one only reason: That was to protect him and others from prosecution and indictment, which he clearly understood was going to follow as a result of the acts of that day. I don't think anybody could draw any other reasonable inference from the fact of that message.

With respect to the question of whether Mr. Rhodes gave an order, which we've talked about, Mr. Bright, let me say at the outset, I think -- and, again, my job here is not to try and reconcile the jury verdicts. But I suspect the jury did not find you guilty of conspiracy to obstruct -- that is, the 1512(k) count -- because they had some uncertainty of what was said on that phone call. That's my guess. I mean, they had all this other evidence of what was said, what was done. They had an incredible paper trail, electronic trail of what was said and what was done. And this one key fact they didn't actually have the contents of what was said. And that would include Mr. Greene's testimony, because he couldn't recall whether the phone call happened.

But, of course, that's not where we are. I'm not being asked to make any findings here by beyond a reasonable doubt. And in an important sense, I don't have to.

And why I say that is the following: Because I think it was reasonably foreseeable to Mr. Rhodes that people would have gone in and gone in for the reasons that they did; that was to stop the vote count. He would have foreseen that fact from all of the communications that they had prior to January 6th. Certainly, he would have known that the objective that day was to resist the transfer of power. That was one of the reasons he came to Washington, D.C. It's abundantly clear from the communications.

Two, when things went to hell at the Capitol, he didn't tell his people to stay at bay. He didn't tell them, "Look, you know, stay with your protectees. Just keep them safe." That's not what he said.

"Come to me. I'm on the south side of the Capitol."

Why would he have done that if he didn't know and didn't understand that they would join the melee, that they would have joined the other hundreds and thousands of people who were there breaking into the Capitol Building? It defies explanation. It defies explanation that he would bring and order another 20 or 30 people to come to the Capitol if, in fact, he was of the view that I had no -- I

didn't want them to go in. It's just not plausible. But that's not what I need to decide right now. They had, of course, discussed in advance the need to use force. They discussed in advance the need to prevent the transfer of power.

And so, as I said, it was reasonably foreseeable for him to -- reasonably foreseeable to him that people would have entered the building, that they would have used force once they were in the building, because they had talked about the use of force even if it hadn't been specifically directed at a police officer or any precise plan. It was clearly foreseeable to Mr. Rhodes that if he brought his people to the Capitol, which he did, that they would have gone in. There's no doubt in my mind.

The closer question, it seems to me, is whether by a preponderance of the evidence I can conclude that Mr. Rhodes, in fact, knew they went in and that, in fact, he approved their entry to the Capitol.

Mr. Bright, you're right. There was certainly evidence at trial that I think could cause a reasonable juror to question that or in the absence of evidence. Mr. Dolan's testimony, I think, did come as a surprise to all concerned and I think may have played a role in the jury's consideration of that count.

But here's what the other evidence showed. First,

is that, as I said earlier, this was an extremely hierarchical organization with structure as a hierarchical organization, with Mr. Rhodes at the top. He was the one giving the orders. He was the one organizing the teams that day. He was the reason they were, in fact, in Washington, D.C., on January 6th. Oath Keepers wouldn't have been there but for Stewart Rhodes. I don't think anybody contends otherwise. They were there because of him. He wanted the Oath Keepers to be there. And they went.

Given that, I find it very hard to believe that Kelly Meggs would have led those folks in there without the green light from Mr. Rhodes. Maybe that's naive, maybe I'm not giving Kelly Meggs enough credit, but it is hard for me to believe he would not have cleared that with Stewart Rhodes first.

Why? For two reasons.

One, because of the hierarchical relationship.

Two, we had testimony at trial from two witnesses who said, one, "Mr. Rhodes was trying to get ahold of somebody, and they thought it was Stewart Rhodes." He was making calls. Mr. Meggs was trying to get ahold of somebody as they were walking to the Capitol, and they thought it was Mr. Rhodes.

And, two, we now know that -- and a second witness said, you know, Mr. Meggs was contemplating whether to go

in. And then a third witness ultimately said -- and that was Mr. Berry -- "Mr. Meggs said, 'We're going in to stop the vote -- stop the count,'" I think, was Mr. Berry's words. I don't ascribe that level of planning, purpose, authority to Kelly Meggs without Mr. Rhodes authorizing it. I don't.

There is the issue of the timing, which is pretty remarkable, that as soon as that three-way call ends, Kelly Meggs goes. It's certainly further evidence that supports that Mr. Rhodes not only knew but in some sense authorized it.

There's then Mr. Rhodes' actions and words after January 6th. It is true that there was testimony from Mr. Dolan that he heard Mr. Rhodes use the words, "That was pretty stupid."

It was a little equivocal in terms of exactly what was said and in what context.

His exact testimony was this. He was asked, "When you saw Mr. Rhodes after you were inside of the Capitol building, did he scold you for what you had done?"

This is page 4409.

"I didn't get scolded. I think I heard him say at one point in time, 'That was pretty stupid,' but I couldn't tell you exactly what he said. And then I probably wasn't paying too much attention after that."

Later on he was asked, "I think that was in connection" -- he was asked, "Was that comment directed at you, or you heard that in connection with someone else?"

His answer was: "I think that was in connection to when we went inside.

"No, but who was he talking to?

"I believe he was talking to Kelly at the time, but I'm not 100 percent sure."

Mr. Greene's testimony was also along -- a little less detailed. He was asked: "At this time, had you become aware that Oath Keepers had gone into the Rotunda?"

Mr. Greene's answer was: "Well, so when we were standing on the corner of the steps there, somebody mentioned another name. I mean, somebody mentioned somebody by name and said that they went in. And Stewart said, 'Well, that was effing stupid.'

"And then I think as I was driving home, he got a call from Kellye."

So there's certainly some evidence to suggest that Mr. Rhodes used those words. But you compare that against what he said afterwards. There is not a single message, not one, in all of the messages that were introduced at trial on the eve of January 6th going forward suggesting Mr. Rhodes showed any regret for what happened or that he admonished anyone on those Signal chats for "Why did you go in?"

Nothing like that. "It was stupid of you all to go in," not once, and he's a prolific communicator. Not once.

He clearly had no regret at all about what happened that day, and I don't think he had any regret about his own people going in.

And, of course, then there is the consciousness-of-guilt evidence. As I said, I don't think he was simply trying to protect others by telling them to delete messages. He was trying to protect himself, because he knew exactly what those message contents would be and what they were and what the potential legal consequences were. Why? Because Stewart Rhodes is a Yale law grad, and he's a pretty smart guy.

So I do find by a preponderance of the evidence that Mr. Rhodes, in fact, knew and approved that there was entry -- that others would enter the Capitol and, therefore, is on that alternative ground, in addition to the fact that the conduct is reasonably foreseeable, but that he also, in fact, knew. And I'm making that finding by a preponderance of the evidence.

With respect to the Guidelines, so as to the due administration of justice, as I ruled yesterday, this does apply as a matter of law. It also applies as a matter of fact. The essence of the seditious agreement represented a threat to others, including members of Congress.

Mr. Rhodes and other co-conspirators had established an arsenal of weapons on the other side of the Potomac River that could be brought in on notice if needed to accomplish their ends to disrupt the transfer of power. Such conspiracy, which, by definition, contemplated the use of force against individuals within the United States Government, threatened to cause physical injury to a person. Their presence, combined with other members of the mob in the immediate vicinity, also threatened to cause physical harm to staff members of the Speaker of the House, actually. Sorry.

Mr. Rhodes is also responsible for the actual physical injuries to certain officers or threatening to cause injury to those officers, because he's also responsible for the conduct of his co-defendants. These acts, as I said, were not only taken within the scope of the conspiracy, but they were reasonably foreseeable to Mr. Rhodes and in furtherance of the conspiracy itself. That would be the injuries or the threatened injuries to Officers Salke any Officer Carrion, who were at the Columbus Doors when Oath Keepers came through that door, along with a mob of others. And, again, it's just their conduct and not the mob I'm talking about, to be clear.

Officer Christopher Owens and other Metropolitan Police Department officers who were in the Senate hallway

who faced Ms. Watkins and others, along with others who were pushing against that police line trying to gain access to the Senate chamber. Officers Anthony Jackson and Martha Lazo, who were the object of Mr. James's assault that day.

And then, of course, as I just said, it was the presence of Mr. Meggs and Mr. Harrelson and others right outside the immediate vicinity of the Speaker's suite that threatened physical harm to them and those members of her staff that were inside cowering in fear for the time -- for the period of time that the Oath Keepers were outside that office, set of office suites. So for those reasons, I do find that the due administration of -- that the eight-point enhancement applies.

Three-level enhancement also applies for substantial interference with the administration of justice. As I said yesterday, the delay of the proceedings, the fact that the proceedings had to be adjourned and then were adjourned for a period of time constitutes substantial interference. I don't find it at all persuasive the fact that perhaps Congress would have continued the vote, no matter what the circumstances would have been, to somehow not apply the enhancement. The fact of the matter is, it was obstructed, it was obstructed for a long period of time, and it was substantial.

And, of course, there was the additional costs that we heard about, both in terms of cleanup and in terms of additional Secret Service that had to come to the Capitol. Again, Mr. Rhodes and his group were just but one cause of that. But the fact that they contributed to that, based upon the standard that I articulated earlier, suffices to establish that their conduct resulted in substantial interference with the administration of justice.

Certainly there was extensive scope and planning. Again, remember, he was convicted of seditious conspiracy, not merely going into the building.

Clearly there was extensive scope and planning for the events of January 6th. Even if we take the time period simply from December 19th forward, there's extensive scope and planning in terms of gathering people, making arrangements for transportation, hotel, bringing of weapons, and creating of groups to operate on that day.

And then, of course, planning and preparation in terms of going into the building was exhibited by the way in which people entered in groups, in a line, whether you want to call it a stack or not. Nevertheless, that is planning and preparation, and shows organization. So those two levels apply as well.

The obstruction two levels apply. Clearly, Mr. Rhodes was convicted of obstruction under 1512(c)(1).

Those two levels apply.

The four levels for organizer and leader apply. As I said earlier, Mr. Rhodes was at the top of the chain. And it's not just the top of -- it's not just that he was the founder and leader of the Oath Keepers. That's not the only reason. The Oath Keepers don't come to D.C. on November 14th but for Mr. Rhodes. They don't come to the Jericho March on December 12th, I believe it was, but for Mr. Rhodes. And they are not here on January 6th but for Mr. Rhodes.

Mr. Rhodes directed his co-conspirators to come to the Capitol, and they abided. Mr. Meggs came to the Capitol. Mr. James and his group came to the Capitol. This was all after he told them to come to the Capitol.

And, ultimately, there was testimony about that Mr. Rhodes, at least in the perception of some witnesses, would have been the one who made the decision whether to bring the arms in, and that certainly rings true.

There are other pieces of information here and there that also establish the four levels of organizing and control. He referred to, for example, Roberto Minuta as "one of my most trusted men," suggesting a hierarchical relationship and an ability to control.

He designates Mr. Siekerman, Mr. Greene, Mr. James, and Mr. Meggs as leaders for the January 6 op,

again, suggesting a level of hierarchical control and leadership and organization by Mr. Rhodes. And so I think this is not a close call that the four-level enhancement applies as well as for the government's requested six-level departure, under 3A1.4, Note 4.

As I said yesterday, I think as a matter of law, the conduct of conviction of seditious conspiracy meets the description foursquare of what that element -- excuse me, what that enhancement requires a showing of, which is an offense other than the one that is enumerated in the Guideline, but the motive was to intimidate or coerce a civilian -- I'm sorry, rather than -- sorry.

The motive was to -- calculated to influence or affect the conduct of government by intimidation or coercion, which were to retaliate against government conduct. Certainly that first clause applies squarely to the conduct of conviction.

And based upon the facts as I found them yesterday and have incorporated them today, Mr. Rhodes and his compatriots' objective was to affect the conduct of government, specifically Congress, and to do so through intimidation and coercion by means of force, both through the stockpiling of weapons in the event that they needed to be brought across the river -- there was an agreement as to that -- and then, of course, the actual use of force by

others who went into the building and applied that force against police officers who were doing their duty that day.

In terms of the levels, I disagree that it is an all-or-nothing proposition. The Guidelines clearly don't contemplate that. The only restriction is that the levels can't increase more than a certain number to -- that would require the -- which would have the Guidelines become equivalent to what the actual terrorism enhancement would do. And so it only establishes a cap on what a court can do and not a floor.

I think the six levels is appropriate, and how does one get there? I think the way I get there is the nature of the conduct, and let me be clear. This is not -- this is a separate -- it's a separate and more serious conduct than what's captured by the Guideline. And I say that because the Guideline itself does not necessarily require the level of intimidation and calculation and targeting that the terrorism enhancement -- what we will call the terrorism enhancement in the note requires.

This is an additional level of calculation. It is an additional level of planning. It is an additional level of purpose. It is an additional level of targeting, in this case, an institution of American democracy at its most important moment, the transfer of power. That's pretty significant. That's what the jury found. And I agree with

them.

It seems to me six levels is appropriate. I think the case the government cited in its brief at page 57, I think it is -- no, page 67, the case in Oregon in which the judge there apportioned enhancement levels according to level of culpability -- in fact, the highest there was 10. We're not even going that far for Mr. Rhodes. I think a six-level enhancement, in order to sort of assure some degree of proportionality to those who are involved in that case and, ultimately, to ensure appropriate proportionality to other defendants in this case, I think, is appropriate. So what all of that means is -- oh, two other things -- or three other things.

The defense has requested a two-level reduction for acceptance of responsibility under 3E1.1. I decline to do so. There's no basis for that. Mr. Rhodes proceeded to trial for reasons unrelated to factual guilt. And although that is not the sole reason somebody could receive a two-point reduction for acceptance, there are no special circumstances here in which the rare reason or the rare exception -- circumstance would apply for that two-level reduction, despite somebody having gone to trial. And, in fact, Mr. Rhodes' comments, which we will soon talk about, that he has made consistently since January 6th and since he's been charged and since he's been convicted clearly

demonstrate no acceptance of responsibility.

The defense has also requested a downward departure under 5H1.11 for exceptional -- for military service. However, that departure is appropriately -- appropriate only where military service or civic-mindedness is present to an unusual degree.

The Supreme Court has described this in *Koon versus United States*, 518 U.S. 81, 1996, as one of a handful of discourage factors of departure, and it doesn't apply here.

It is true Mr. Rhodes served his country; however, it was not to an unusual degree. I believe it was about four years.

I am not here to say that there weren't civic and charitably-minded efforts that the Oath Keepers undertook. They did. And I suppose there is something to be said about that. But, again, not to an unusual degree and certainly not to a degree that eclipses the other conduct of the group, not only on January 6th, but in the years prior.

There's also a request for departure under 4K2.0 [sic] based on circumstances of a kind not adequately taken into consideration in the Guidelines and based on circumstances that are present to a degree not adequately taken into consideration by the Guidelines.

The defense hasn't really specified what the

circumstances either are in kind or degree that would warrant the departure. If anything, I think the kind or degree of conduct here would and does support an upward departure, although not under 5K2.0. I've already departed for a different reason.

So the Guidelines calculation, ultimately, is as follows:

For seditious conspiracy, it's 2X5.1. Treason has been determined to be the appropriate analogue; however, because the conduct is not tantamount to waging war against the United States, we are all in agreement, as am I, that the appropriate Guideline is 2J1.2. That is also the Guideline for Counts 3 and 7 of conviction for Mr. Rhodes.

Counts 1 and 3 group because it involves the same victim -- that is, Congress or the government -- as well as two or more acts connected by a common criminal objective or constituting part of a common scheme or plan.

Count 7 also groups with Counts 1 and 3, because the obstruction is considered a specific offense characteristic of the other group.

So under 2J1.2 -- and I know I'm supposed to separate these out. But because we're all using the same Guideline, I think it's appropriate to do it in this for purposes of this sentencing.

2J1.2, the Base Offense Level is a 14.

The eight-level enhancement for causing or threatening physical injury to a person or property damage in order to obstruct the administration of justice, additional eight levels.

Substantial interference with the administration of justice, three levels.

Offense was extensive in scope, planning, or preparation, two levels.

Role in the offense, four levels.

Obstruction, an additional two levels.

And the terrorism departure, an additional six levels.

For a total offense level of 39, Criminal History Category 1, for a Guidelines Range of 262 to 327 months, and a fine range of 50,000 to $500,000.

So that's the Court's Guidelines calculation. Let us now move to hearing the parties' allocutions.

We will begin with the government, Ms. Rakoczy.

MS. RAKOCZY: Thank you, Your Honor.

The government is asking for a very significant sentence of incarceration for Mr. Rhodes, 25 years of incarceration, although we would note that sentence is squarely within the middle of the applicable Guidelines Range that the Court has just found.

We are asking for this sentence because Mr. Rhodes

led a conspiracy to use force and violence to intimidate and coerce members of our government into stopping the lawful transfer of power following a Presidential election. As the Court has just found, that is terrorism, and it is conduct that threatened and continues to threaten the rule of law in the United States.

This Court has previously explained in other sentencing hearings of January 6th defendants that it has been one of the great tragedies of history to see ordinary, hardworking Americans turn into criminals on January 6th.

The Court has observed that those who led these defendants down that path have yet to suffer the consequences. With this sentencing hearing and the sentencing hearings that are to come in this case, we believe that is changing.

Defendant Rhodes, along with his eight co-defendants, played a leadership role in a seditious conspiracy to oppose by force the lawful transfer of power in this country.

Mr. Rhodes orchestrated this conspiracy, inspiring over 30 American citizens to participate in the conspiracy and to travel across the country with an arsenal of firearms and other weapons in order to try to oppose the election results from becoming final.

And who knows how many other January 6 rioters

were influenced by Mr. Rhodes? As the leader of the Oath Keepers, we know he had at least hundreds of active participants and followers in his chats in which the Court saw how he repeatedly advocated for the seditious goals that he has been found guilty of.

There were hundreds of people who followed the Oath Keepers website where he put the open letters in which he openly called for essentially revolution against the United States.

Your Honor, we talked a lot in our sentencing memos about Mr. Rhodes' efforts at and his success at manipulating people across his life and across his leadership of the Oath Keepers. I'd like to focus here on Mr. Rhodes' attempts to radicalize his co-conspirators and other followers in this case.

Mr. Rhodes doggedly drilled into the minds of those on his chats and those followers in the Oath Keepers the lie of the election fraud and the false need to act like the Founding Fathers in order to save, in his view, our Constitution and our country.

Witness after witness took that stand during this trial and during the trial in the related case to tell this Court about how they were lost in 2020, searching for meaning in life, looking for a way to give back to their country.

All four of the cooperators who testified across these trials and many of the other civilian witnesses were either former or aspiring military members. And you heard in their own words how Rhodes capitalized on these vulnerabilities and these inclinations in order to encourage them to become, in their own words, traitors.

Rhodes' efforts at this manipulation in no way excuses his co-conspirators' conduct. Many of them were inclined to go down this road, but he gave their anger a direction. And he knew that, and he plotted in the best ways to exploit these co-conspirators' weaknesses or inclinations in order to attract the most large following to achieve the goals of his conspiracy.

This leadership role in seeking to radicalize and lead others in a seditious conspiracy warrants the significant sentence of incarceration that the government has requested here for general deterrence, to make future instigators of political violence think twice, and, critically, to ensure the respect for the rule of law that is essential to the survival of our democracy.

A major theme running through Defendant Rhodes' messages in these trials is the idea that his version of the law and the Constitution is supreme. It is necessary for this Court, through its sentence, to say, "No." No American citizen or group of citizens gets to impose by force what

they believe is the law. That is vigilantism. And in the context of trying to change the results of an election, it is fatal to our system of government.

A significant sentence here is also demanded by the goal of specific deterrence. One of the hallmarks and most important goals of sentencing is rehabilitation. Unfortunately for Mr. Rhodes, all of the evidence before the Court suggests that January 6th was neither the first time nor the last time that he will seek to organize political violence in this country.

From the historical perspective provided by Professor Sam Jackson in the book we submitted as government's sentencing memo, Rhodes 6, to the statements from his ex-wife in Government's Exhibit Rhodes 3, to the letter that was recently submitted by the executive director of the Georgetown University Institute for Constitutional Advocacy and Protection, the Court can find that Mr. Rhodes has been calling for violent opposition to the authority of the government of the United States for well over a decade.

He now stands before this Court to be sentenced for leading a seditious conspiracy to stop the transfer of Presidential power, and he continues to advocate for political violence. We submitted numerous examples of interviews Mr. Rhodes conducted from the jail, by the way, in violation of the policy of those institutions, in which

he continued to advocate for opposition to the government by force.

And just four days ago, the Sunday before the week of his sentencing in this case, Defendant Rhodes addressed by phone a "freedom corner rally" outside the D.C. jail in which he continued to push the lie that the 2020 election was stolen, predict another theft of an election in 2024, and warned those in attendance, "They're going to keep coming after those on the political right. It's a suppression campaign, a terror campaign against opposition. And," he said, "it's not going to stop until it's stopped. We're going to have to stop it. The American people are going to have to stop it. It's going to take regime change." These are Mr. Rhodes' words four days ago, knowing that he was about to face this Court for sentencing.

Your Honor, most of us across the political spectrum and throughout this great nation desperately want to believe that January 6th was an outlier. Not Defendant Rhodes. For his role in leading this historic attack on American democracy and for the threat he continues to pose to our system of government, the Court should and must impose a sentence of 25 years.

Thank you.

THE COURT: Ms. Rakoczy, thank you.

Mr. Linder.

MR. LINDER: Thank you, Your Honor.

As I stand here before you thinking about what sentence I should ask for Mr. Rhodes, Mr. Bright and I discussed it. We discussed lots of things. We realized we'd been buried in this case for a year and a half. However, we realized this Court has been buried in this case for two and a half years. We realized that you have sat through three jury trials; that you have read dozens of detention memos, motions; you've probably read all of the PSRs, all of the objections.

And based on your very detailed recitation of the facts yesterday, I believe that you have a very good grasp of the evidence as you see it, and you kind of -- you have an idea of what you want to do. It would be sophomoric of me to believe otherwise.

You're human. You've sat through all of this for two and a half years. You've read all of the memos on both sides. It would be unwise for me to believe that you don't have some kind of range you're thinking about. And I don't believe there's any magic witness I could bring to change your mind. I don't believe there's any magic statement I could bring to change your mind of kind of what you're playing with.

But what I would like to do is, I would like to take a step back. I think what happened on January 6th is

deplorable. I didn't live here. I saw it on TV. It looked crazy. Hearing the witnesses talk about it, it looked crazy. People were hurt. People died. People were scared. And I make no bones about it. It's a serious event.

However, the government wants you to sentence Rhodes out of fear, out of fear that he'll do it again, out of fear of what he did. They want to make Rhodes the face of J6. They wanted to make QAnon Shaman the face of J6 for a while. Now they want to make Rhodes the face of J6, and they want this 25-year sentence. Nothing has come close sentence-wise to a 25-year sentence.

So we go back to the election in November. Rhodes is upset, as are millions and millions of Americans. And as the evidence showed, Rhodes came to D.C. on three different occasions between the election and January 6th. He came for the Million MAGA Rally, the Jericho March, the Stop the Steal Rally, and again on J6.

However, Rhodes didn't plan those events. Rhodes was a participant. He was a speaker at some of them. He brought Oath Keepers to some of them. He didn't plan those events. He didn't plan J6.

You just can't -- it's not as simple as saying -- they want the Court to believe and the public to believe that Rhodes caused this. And I know you're smarter than that. You know the evidence. Rhodes did not cause this.

We need to look at what caused this. The Court needs to look at what caused this. The public needs to look at what caused this. Who got the Million MAGA Rally started? Who got the Jericho March started? Who got the Stop the Steal Rally started? Who got J6 started? It wasn't Rhodes. He was a participant. And we may not like what he did, but he didn't create all of that.

Let me give the Court a hypothetical. Had everything happened just like it did -- the election, the Stop the Steal Rally, the Million MAGA March, the Jericho Rally, all those things had gone on just like they did -- and two days before J6, the Governor of Texas called him and said, "I need you to come to Austin on January 6th. I need you to be down here." And had Rhodes not shown up in D.C., J6 would have still happened just as it did.

I mean, the evidence showed you he was not leading those rioters or commanding those rioters who breached. Those tens of thousands of people weren't in connection with Rhodes. As the evidence has shown, maybe he had 30-, 40,000 members he could have brought. He brought 30 people there. So Rhodes did not cause the events of J6.

Now, some of his Oath Keepers participated in the events of J6. And his rhetoric got people excited, but he was not the one who started that narrative.

If you want to put a face on J6, you can put it on

Trump, right-wing media, politicians -- all the people that spun that narrative for two months. Rhodes was just one of the participants. He didn't create it.

So I'd like to look at some of the sentences that have been assessed against others.

As of April 9th, the government's chart, there were 450 people who had been sentenced. So far, there's been a few more. Of the 450-some-odd people that have been sentenced, only 17 people have gotten 60 months or more.

And I'll just name a few.

Peter Schwartz, who you sentenced in this court a couple weeks ago, 14 years. You know it. You know that case. He had 36 prior arrests. And he was convicted of assaulting officers and being very violent that day.

Thomas Webster, 120 months.

Mr. Head, 90 months.

McCaughey, 90 months.

Guy Reffitt, 87 months.

And the list goes on and on and on.

Every one of those 17 people who got 60 months or more were convicted of assaulting officers. Most of them had criminal histories.

Mr. Rhodes has none. Mr. Rhodes didn't assault an officer that day. Mr. Rhodes didn't go in the Capitol that day. There's some evidence he may not have ordered anybody

to go in the Capitol, even though they did. But all of these people had dangerous tendencies, criminal history, and things like that.

What I would like to ask the Court to kind of think about: Is it more dangerous for someone who plans a bank robbery and then doesn't really execute it, or is the person more dangerous that goes and assaults and beats up the security guard on their own?

I mean, in my opinion, as a citizen, the assaultive person is the dangerous person and should get a higher sentence than someone who talks a lot, runs their mouth, gets people excited. I don't think that sentencing out of fear is the right thing to do in this case.

I think the Court correctly asked the government yesterday what the government plans to do with the cooperating defendants. I think that's a great question. I think Mr. Nestler answered it about the best way that he could, is that they're still cooperating, so we can't tell you.

However, if you give Mr. Rhodes a 25-year sentence, do you box yourself in to giving those guys 15 or 18 under 3553(a)(6), which is kind of what I'm addressing here?

Does it -- it doesn't limit -- the Court can do what it wants to do. But does it create, as you expressed

yesterday, concern for you that, if I give Rhodes 25, you better not come and ask for four for these guys that are cooperating? I mean, there's a big range there, and there's nothing comparative about that.

So Mr. Nestler, in his response, in his sentencing memorandum, in his response to the fact that I included the sentencing chart, he mentions three of these people that I just talked about: McCaughey, Webster, and Head, and that they should get -- none of them were convicted of conspiracy, so Mr. Rhodes is more dangerous, but they were all convicted of these violent assaults that we talked about.

In addition, on pages 79 through 81 of Mr. Nestler's memorandum, he talks about previous sedition cases in which multiple defendants were either convicted or pled to seditious conspiracy and sentenced for treason for allegedly waging war against the United States.

But what differentiates -- and that's *U.S. v. Rahman*, *U.S. v. Battle*, *U.S. v. Battiste*, and *U.S. v. Khan*, and *U.S. v. Al-Timimi*. All of these cases were cases in which the defendants were plotting to kill Americans, blowing up the World Trade Center, joining the Taliban to fight American soldiers and kill them.

Mr. Rhodes plotted no such thing. His actions aren't anywhere similar to these things that the prosecutors

mentioned in its memorandum.

In closing, Your Honor, the evidence was clear that the people who went into the Capitol first were not being controlled by Rhodes and were not communicating with Rhodes. The people that breached the Capitol first breached it on their own. And had Rhodes not been there, it would have happened anyway. Not excusing his activities, but I want to deep it in perspective with everybody.

He's got no criminal history. 20-year record, I think, of notable community service with his military and what he's done with the disaster relief, things that Oath Keepers did for a long time or has done for a long time.

So I would ask for a much lower sentence. I would ask for a sentence of less than 60 months, because the 60-month and more had been reserved for the people who were truly violent and had criminal history.

In addition, as the Court knows, as the public may not, but as the Court knows, whatever sentence you give him, you've got three years of supervised release to control him after that. Whether you give him 4 years, 8 years, 12 years, you've got another three years after that that you can exercise control over him.

So, Your Honor, thank you for this opportunity. Just I would ask that we don't -- and I don't believe you

will because I've gotten to know you, but I would ask that people not want to sentence Rhodes out of fear but to sentence him for how his actions fit in with everybody else's that day and what did he -- we may not like the rhetoric that he did, but he's not the one who started that rhetoric and got the American people ginned up. That started somewhere else. He was just a participant.

Thank you, Your Honor.

THE COURT: Thank you, Mr. Linder.

MR. BRIGHT: Your Honor, despite my desires, I think it's probably best that at this point, I allow Mr. Linder to, on behalf of the defense team, close that out.

I think at this point, as anticipated by many, we would give the opportunity to Mr. Rhodes to speak on his own behalf at this time.

THE COURT: Mr. Rhodes.

THE DEFENDANT: I will just start by saying that I'm a political prisoner. And like President Trump, my only crime is opposing those who are destroying our country. I did so using my First Amendment protected free speech, my political speech, while also protecting the right to speech of others, as we had done throughout the Trump administration out of necessity because of the systemic violence from the left to attempt to shut down the free

speech by Trump supporters.

This started at Trump's inauguration. We were there protecting and guiding a group of ladies who wanted to attend the DeploraBall the night before the inauguration but were afraid to go without an escort, and so we protected them.

The very next day, we did the same kind of escorts in the streets of D.C. to protect Trump supporters, vulnerable people, elderly, families with children, lone women who were vulnerable to attack by Antifa.

And Antifa, as well as Refuse Fascism, had proclaimed that they were going to prevent President Trump from being inaugurated -- from being sworn in, and to prevent the transfer of power.

And yet none of them were -- and this is large blocks of hundreds of people dressed in black bloc, as Antifa does, attempting to block with violence the entry of Trump supporters into the inauguration area, yet none of them was ever prosecuted, to my mind, for seditious conspiracy, even though it was obviously a seditious conspiracy bent on very openly saying they're going to stop the transfer of power.

We protected people all throughout the Trump administration all across the country, including outside of Trump rallies where Antifa knows that Trump supporters will

be entering the rally through Secret Service and, therefore, would be unarmed when they come back outside.

And Antifa would prefer to attack people -- like in Texas, for example, where folks carry guns all the time, they would like to have unarmed victims. One veteran in Texas, walking unarmed back to his truck, was hit in the back of the head with a lead pipe and knocked unconscious.

And so that's why we stepped up across the country, and we have armed escorts waiting outside the Trump rallies, retired police officers, military veterans, to escort the unarmed Trump supporters, elderly or lone people, again, back to their vehicles. You shouldn't have to do that in this country.

And, unfortunately, that was the pattern throughout the Trump administration of repeated systemic violence by the left and our need to step up, starting in Berkeley, two rallies. We just watched a rally on TV be shut down by violence with police standing back and not doing anything about it and Antifa attacking people, including a transgender Trump supporter. Didn't make a difference. If you were a Trump supporter, they yelled and screamed they were Nazis and "Punch the Nazis," and they just attacked them. So we saw that and we stepped in.

The very next time we attended a rally, we protected it. We did so peacefully. We deterred Antifa.

Antifa did not close in on us, did not enter the park, did not touch anyone that we were protecting. And, of course, the presence of armed, retired police officers and Oath Keepers and some current serving definitely had an effect on them.

But that's been -- our focal point is deterrence, unlike the characterization of all of the Southern Poverty Law Center and all these groups out there, our men are not violent. There's zero record of any Oath Keeper ever shooting anybody or punching anybody or even spraying pepper spray on anybody across the country at hundreds and hundreds of events that we secured. Zero record of actual use of force, because we deter.

Unlike other groups like the Proud Boys, who seek conflict and seek to street-fight, we don't. We simply deter. We don't yell and scream and call them names. They'll throw things at us like firecrackers. If it's not going to actually hurt us, we just stand our ground and stay quiet. We don't respond back when they yell at us. We teach our guys to be quiet professionals.

In D.C., we did nine security operations prior to January 6th, all of them without any incidents, all of them without a hitch. And at all of them, we give our guys the option of wearing body armor and helmets because Antifa will throw bricks and frozen water bottles. We tell them to wear

goggles because Antifa will throw bleach and urine and other substances that you don't want in your eyes.

And, of course, they wear body armor because Antifa stabs people. They just stabbed people in Washington, D.C., in December when we were there. So the garb they were wearing that day was to protect them during a security mission against Antifa, the same exact garb we wore across the country.

On J6, just to clarify for everyone, the public included, as my lawyers have already said, I did not go inside, nor did I instruct anybody else to. I stood outside, used my First Amendment protected right to free speech.

I had just spoken at 11:00 a.m. on January the 6th on the stage at the Latino's for Trump rally about a block north in Area 7, next to the Senate buildings in what's known as Lower Senate Park. I had given a speech there, and Oath Keepers provided security for that event. And that security team, the guys from South Carolina stayed there the entire day.

When I was standing in the northeast corner of the Capitol, I was there because Area 8 is also in the northeast section of the lawn of the Capitol, and that's where the next event was going to be for Ali Alexander.

And so just to reply to the Court's comment that

it didn't make sense for me to bring them there, well, they were already going to be going there. Kelly Meggs' team was transporting people from The Ellipse, escorting them to the Capitol to attend and speak at Ali Alexander's next event in Area 8.

And my concern was, as we couldn't reach him and we couldn't -- I couldn't reach him, and Mr. Greene could reach him. Our concern was that they would get caught up in the turmoil outside the Capitol. That's why I was trying to intercept them, trying to stand in between where they were going to be going and where they were coming from along the walkways and trying to find them, because I wanted to make sure that they didn't get caught up.

And that's why I said, in our chats, posted in our chats for myself and Mr. Greene, "If anyone is not on duty, please come to us. Come where we are."

I didn't want anyone who's not still on task to get caught up, and I was concerned about Mr. Meggs' team because I could not reach them.

As has been stated already in the evidence, when they finally did come to me -- they'd came to me and Mr. Greene. He was with me at that time -- they said they had gone inside. And I said, "That was stupid."

Mr. Greene was actually in charge of assigning the teams that day. Yes, I'm the leader ultimately. But I put

an operations leader who -- I always put officers in charge, police officers. Mr. Greene was not only a military veteran; he was also a former police officer.

I always put police officers in leadership. I never take personal leadership unless I have no choice if I don't have an officer. So before Mr. Greene, it was going to be Don. Then Don got sick and Mr. Greene took over. But Don was also a retired police officer. So that is how I operate.

And I also operate what they call the leadership by exception where I put good men in charge. I trust them to do the right thing. If I see a problem, I step in.

On J6, I did see a problem. I saw basically a riot happening outside of the Capitol on the west side. I saw some of the photos and videos in our chats. I couldn't see over the edge to see what was really going on when I was on the top tier, but I knew there was fighting going on between Trump supporters and the police, and I didn't want our guys to be part of it.

So that was my concern and why I stepped in and said, "Come to me." And I had Mr. Greene come to me. I wanted him to be with me so that him and us together could do the best we could to keep them from -- any of our guys from getting caught up in that.

Because we knew multiple teams were headed that

way. Josh James' team was the PSD for Roger Stone. And they were supposed to be bringing Roger Stone, who was keynote speaker for that event in Area 8. I also did not want them to get caught up in that. Unfortunately, they went ahead and got caught up in it.

That's the backdrop. I just want to make it very clear to the public that no Oath Keeper, despite all of that, no Oath Keeper took part in any of the fighting. No Oath Keeper -- consistent with our behavior across the country, no Oath Keeper punched anyone on J6; kicked anyone, and least of all, a police officer; threw anything at them; pepper-sprayed them; hit them with a stun gun, flagpole, baseball bat. None of that was done by any Oath Keeper at all. That was all done by other people who were not Oath Keepers.

The worst thing an Oath Keeper did on that day was Jessica Watkins, her own testimony, admitted that she had pushed in the hallway, in the Senate hallway, when she was taking command of her own little militia and doing her own thing.

And the other one was Josh James, who lost his military bearing, lost his temper, and pushed -- or pulled on a police officer after someone had shoved him into the police officer and then yelled. I don't make any excuses for that. But even there, he did not strike the officer or

body-slam him or anything else. There was no injury whatsoever to that officer.

So while I'm very sympathetic to the testimony yesterday, heart-rending testimony of all the officers who experienced violence that day and still bear the scars from it, emotionally and physical, man, I've got a lot of cops in my organization. We have a lot of police. Probably about 30 percent of our organization is police officers. But none of those were caused by any Oath Keepers.

So it was bizarre to hear all of that as though we were in someone else's trial and someone else's sentencing that have all of that attributed to me and my brothers and sisters. I find it offensive, frankly.

This has been a surreal experience. I feel like I'm the lead character in a Kafka's "The Trial." I feel like that it was a preordained guilt from day one way back on February 16th when Bennie Thompson, the Congressman, filed a lawsuit alleging a conspiracy between Trump, Giuliani, Oath Keepers, and Proud Boys, and filed it in the Court; accused us of being white supremacists, which is completely ridiculous. My vice president was black. I'm part Mexican. Again, incredibly offensive. I should sue him for defamation.

But he hired the NAACP. The argument was that the Oath Keepers and President Trump and the Proud Boys all

conspired together to disenfranchise black voters. By challenging the elections and by attacking the certification, they were disenfranchising black voters, and that violated the KKK Act. Of course, it's all meant to smear the MAGA movement as being somehow racist and trying to tie them to the KKK, which was a Democratic -- founded by the Democratic party -- organization. From day one, that has been the narrative and that has been the script and that has been the agenda set by the media.

The media first focused on Oath Keepers because what is the difference between the behavior of Kelly Meggs and the other Oath Keepers who just wandered into the Capitol, wandered around, took selfies, wandered back out, and all the other thousands of people that also did the same exact same thing? Why were they found guilty of trespass, misdemeanor trespass, or parading? But they did nothing different than the Oath Keepers. The difference was they weren't Oath Keepers. So it's really about it's the Oath Keepers. *The New York Times* featured them, "Oh, look at this row of Oath Keepers. The Oath Keepers led the assault."

And then, of course, the Proud Boys, the Oath Keepers and the Proud Boys, the two groups that the left hates the most on the political right, in large part because we stopped their violence in the streets. And we

did it very peacefully and effectively, and they don't like that.

So they have had a target on our backs for the entire time that this organization existed and have demonized us at every turn and taken out of context and smeared us about everything we do.

THE COURT: Mr. Rhodes, if I could interrupt you.

THE DEFENDANT: Yes, sir.

THE COURT: It's been about 20 minutes, so I'm going to ask you to wrap up shortly.

THE DEFENDANT: Got it. Thank you. Yes, Your Honor.

So what I want to say, though, Ms. Rakoczy talked about this phone call the other night. And this is a really good example of both what the prosecution has done throughout this case and what the media has done, what Congress has done, it's the same kind of narrative.

She quotes me as saying, "It won't stop until it's stopped. It's going to take regime change." And she stops right there. She leaves out that the next thing I say is, "I hope Trump wins in 2024. That would be regime change." That's what I was talking about. This is a good example of what they do to manipulate what we say and take it out of context.

I always focused on what President Trump could do

as a President, to invoke the Insurrection Act. And the main thing I talked about doing, which no one mentions at all here, is to do a mass declassification and data dump to expose criminality in our government. Put sunlight on it. That's the best thing you can do peacefully to have remedy and to fix things. I believe this country is incredibly divided. And this prosecution, not just of me, but all the J6ers, is making it even worse.

I have considered every J6er a political prisoner because all of them are being grossly overcharged. And it's not going to help. It's not going to deter people. It's going to make people feel that this government is even more illegitimate than they believed before.

And one last thing I'm going to say is that my focus was on the Constitution, on Article II, and I'm not the only one. Texas sued Pennsylvania on this issue. Unfortunately, the Supreme Court did not hear the case when they should have on their own original jurisdiction.

20 other states joined in, arguing that because it was not the legislature that had changed the rules for COVID, but it was, in fact, Executive Branch election officials or its state judges, that that violated Article II, which leaves it to "each state shall appoint, in such manner as the legislature thereof may direct, a number of electors."

It's up the state legislature. That's what makes it unconstitutional. It's not simply a conspiracy theory or a false narrative about fraud. It's about the Constitution itself. And the Constitution says what it says. It means what it says.

I'm not going to be able to drop that. Under my oath, I cannot ignore the text of the Constitution. And you have created -- not you, Your Honor, but they have created a constitutional crisis that continues on. Unless that is addressed and is reconciled, this division is not going to stop.

And characterizing all Trump supporters as terrorists and racists and fools and they have been led down the criminal's path by Trump and they're somehow fools does not help either.

I want to say in closing that however long I spend in prison, my goal will to be an American Solzhenitsyn to expose the criminality of this regime.

Thank you, sir.

THE COURT: All right. Mr. Rhodes, thank you for your statement.

We will take a break. Give me a few minutes. I'll be right back. Thank you, everyone.

COURTROOM DEPUTY: All rise.

This Court stands in recess.

(Recess from 12:23 p.m. to 12:36 p.m.)

COURTROOM DEPUTY: All rise. This Honorable Court is again in session.

THE COURT: Thank you.

COURTROOM DEPUTY: And please be seated, everyone, and come to order.

THE COURT: Okay, everyone.

So let me just restate what the Guidelines are. They are 262 to 327 months, based upon my calculation.

In addition to the Guidelines, I must consider all the factors that are set forth in 18 United States Code 3553(a) and impose a sentence that is sufficient but not greater than necessary to achieve the objectives of sentencing set forth in the statute.

The factors I must consider are the nature and circumstances of the offense and the history and characteristics of the defendant, the need for the sentence imposed to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense, afford adequate deterrence, to protect the public, and to provide the defendant with any need educational or vocational training or medical care. I also should consider unwarranted disparities.

I'm going to take this in a slightly different order than is set forth in the statute.

Just beginning with disparities, the defense has rightly brought forward a compilation and summary of other sentences that have been issued in January 6th cases, the most serious of which was 14-plus years, and the next most serious, which was ten years. Both of those cases involved assaultive conduct of quite a serious level, particularly directed at police officers. I've certainly taken that into account. I will say that I don't find -- and I'll explain in a moment why -- those cases to be useful comparators, because none of those defendants were convicted of conspiracy, let alone seditious conspiracy.

I have, however, considered two things, and the sentence will reflect it, in connection with avoiding unwarranted disparities. One is the sedition sentences in other cases that you have pointed out, Mr. Linder, and the facts and circumstances of those cases.

In particular, as you have pointed out and I have thought about, the seditious conspiracy in these other cases involved, some of them, the actual targeting and killing of Americans or the traveling to foreign lands to combat American soldiers. This is not that.

I've also considered, and will be considering, the need for proportionality with respect to the other members of this conspiracy and thinking about how Mr. Rhodes fits in and what his sentence means for others.

The need for the sentence imposed to reflect the seriousness of the offense and to promote respect for the law and to provide just punishment, I think, in some sense, those are factors that speak for themselves in light of what the nature and circumstances of the offense are.

Mr. Rhodes, you were convicted of seditious conspiracy. You are a lawyer. You understand what that means. But for those who are not, let me provide the following background.

It is true that neither Mr. Rhodes nor any of one of his conspirators used a weapon against a police officer, maimed a police officer that day, and there were those who did worse in terms of physical assaults.

Here's what the Supreme Court said in 1961 in a case called *Callanan*, C-a-l-l-a-n-a-n, *versus United States*, 364 U.S. 587:

"Collective criminal agreement, partnership in crime presents a greater potential threat to the public than individual dealings. Concerted action both increases the likelihood that the criminal object will be successfully attained and decreases the probability that the individuals involved will depart from their path of criminality.

"Group association for criminal purposes, often, if not normally, makes possible the attainment of ends more complex than those which one criminal could accomplish, nor

is the danger of a conspiratorial group limited to the particular end toward which it has embarked. Combination in crime makes more likely the commission of crimes unrelated to the original purpose for which the group was formed. In sum, the danger which a conspiracy generates is not confined to the substantive offense, which is the immediate aim of the enterprise."

So the notion that this is -- Mr. Rhodes is not engaged in, he didn't go in the building, the police officers weren't harmed quite in the same way as others by his people -- all true. All true, but not one wit diminishes the seriousness of the offense.

Seditious conspiracy, this is what I wrote:

"At the start of the Civil War, the national government had limited authority under the federal criminal law to detain and punish those who supported the rebellion. The charge of treason, which carried the death penalty, was the primary tool available, but the Constitution defined that offense strictly, and judicial opinions imposed rigorous elements of proof.

"As part of the effort to meet the emergency war posed, Congress enacted statutes to define crimes less than treason. Congressmen believed these measures were necessary since no statute law on the subject existed and common law was not applicable."

A seditious conspiracy, when you take those two concepts and put them together, is among the most serious crimes an individual American can commit. It is an offense against the government to use force. It is an offense against the people of the country.

It's not an offense, in this case, or any other, frankly, that involves sedition that's confined to one day, the actions of one day, one statement you made, how you might have reacted, or what you didn't do. It's a series of acts in which you and others committed to use force, including potentially with weapons, against the government of the United States as it transitioned from one President to the other.

And what was the motive? You didn't like the new guy. I get it. You didn't like the new guy.

Let me be clear about one thing to you, Mr. Rhodes, and anybody else that's listening: In this country, we don't paint with a broad brush, and shame on you if you do. Just because somebody supported the former President doesn't mean they're a white nationalist, doesn't mean they are a right-wing extremist. They voted for the other guy.

We can have civic disagreements about relative merits of policies. We can have discussions about who is the better leader in a particular point in time. But what

we cannot have, we absolutely cannot have, is a group of citizens who, because they didn't like the outcome of the election and because they think the law was not applied and carried out in the way they believe it should be, who are then prepared to take up arms in order to foment a revolution. That's what you did. Those aren't my words. Those are yours. Those are your actions. Those are the actions of your conspirators.

You are not a political prisoner, Mr. Rhodes. You are here for that conduct. Not because of your beliefs, not because you supported the other guy, and not because Joe Biden is President right now.

That is not why you're sitting here. That is not why you stand convicted. You stand convicted because 12 jurors in the District of Columbia, who you have said couldn't be fair and impartial, who acquitted you of multiple counts, found you -- convicted you of sedition. That was a jury of your peers, make no mistake about it.

There are, in my mind, two enduring legacies of January 6th. There is the effect it has had on our democracy and our politics and our elections. I daresay we all now hold our collective breaths every time an election is approaching. Will we have another January 6th again? That remains to be seen.

The other enduring legacy that day is what we saw

on display yesterday. It is the heroism of police officers and people who were working on Capitol Hill that day to not only protect themselves, to protect members of Congress, but to protect the democracy as we know it. That's what they were doing. They laid their bodies on the line.

We talk about keeping oaths. There's nobody better emblematic of keeping their oaths than those police officers, Mr. Rhodes. Their heroism, their stamina, their courage, but for their acts, could have been a far uglier day than already one that is the blackest or one of the blackest days in the history of this country. And people should not forget that.

Let me turn to the history and characteristics of the defendant, and that will bleed into a discussion about general deterrence and specific deterrence.

Mr. Rhodes is now 58 years old. Challenging childhood, to say the least, itinerant growing up. He was married for 23 years but now divorced, has six children, some adults, some young.

He's an educated and accomplished man. Graduated summa cum laude from UNLV.

In between college and undergraduate and law school, enrolled in the military to serve our country. Completed an airborne school, was dishonorably [sic] discharged due to an injury.

Attended Yale Law School and earned a *J.D.* in 2004. Clerked for the Arizona Supreme Court and worked as a criminal defense lawyer from 2005 to 2014 and then founded the Oath Keepers in 2009.

The defense rightly emphasizes some of these positive attributes. His military service, obviously, is a positive attribute. His education, his accomplishments, a positive attribute. The founding of the Oath Keepers, it's been argued it shouldn't be considered an organization that's a white nationalist or racist. I don't. I've heard the evidence. I've seen the people that have come in this courtroom. I don't ascribe any of those pejorative terms to you or your people.

It is true and documented and people should understand that the Oath Keepers have been civic-minded in some instances. They have helped after hurricanes. They have helped to protect people. They've done all that. None of that's in dispute, and none of that is to be questioned.

It really is not my job, however, to pass judgment on the Oath Keepers organization. It is my job to pass judgment on Stewart Rhodes, the founder of that organization. And, regrettably, Mr. Rhodes took many of the positive attributes that I've just described and turned them against his own government: his education, his military background, and his founding of the Oath Keepers,

collectively turned them against the United States Government.

And there's been a history of this. I don't need to detail it. But the Oath Keepers have more than once been involved in potentially violent standoffs and using firearms with the Federal Government, most notably in Bundy ranch. I was assured by your speech that was given after that event, just "You need to understand how close you" -- this is referring to the law enforcement on the other side of that engagement -- "was not going to be a Waco. You trained professionals against untrained women and children. It was going to be you against other well-trained American fighters. It was going to be sheep dog versus sheep dog that day, blood bath that day." That was back in, I think, 2015 you said that.

For decades, Mr. Rhodes, it's clear that you have wanted the democracy in this country to devolve into violence, and you have thought that violence is an acceptable means of accomplishing your goals, your ends, putting your views and imposing them upon others, to overcome the Democratic process. It's reflected in your personal life based upon what your wife has said about your conduct toward her and your children. It is a pattern.

And I daresay, Mr. Rhodes -- and I have never said this about anyone who I have sentenced -- you, sir, present

an ongoing threat and a peril to this country and to the Republic and the very fabric of our democracy.

You're smart, you're charismatic, you are a compelling figure, and, frankly, that's what makes you dangerous.

Dozens of people came to Washington, D.C., because you called upon them to do so. You asked them to bring weapons. You asked them to prepare themselves for war. You asked them to take on their government.

Does anybody think for one moment that Joseph Hackett would have come to Washington, D.C., with a weapon and come to the conclusion that he might need to fight in the streets? Of course not. That happens only because of you, Mr. Rhodes.

And in a sense, the irony is, everyone that you conspired with, everyone that you called to Washington, they, of course, bear responsibility for their own conduct. Nobody is suggesting otherwise. They too are victims, victims of the lies, the propaganda, the rhetoric, and ultimately, the intention that you conveyed and they ultimately agreed to and shared.

It would be one thing, Mr. Rhodes, if, after January 6th, you had looked at what happened that day and said, "You know, that wasn't such a positive development. That was not a good day for our democracy."

But you celebrated it. You thought it was a good thing. And you told Jason Alpers that. You told Jason Alpers in that recording days after January 6th that your only regret was: Should have brought the weapons. And if you had, you would have hung Nancy Pelosi from a lamppost. Doesn't sound like you were just there for a security detail.

Even as you have been incarcerated, you have continued to allude to violence as an acceptable means to address grievances, which continues to underscore the danger you present. You recently said in an interview, "2020 election was not just stolen but also grossly unconstitutional. So that was a coupe, so we had a legitimate grievance on January 6th."

Okay.

"You're going to have to stop it, either through finding some way of wrestling control of the executive branch back into sane hands, but how do you do that?" you asked.

"The Founders' answer was that they had no way to fix the system. They had to separate themselves." And then perhaps in a moment of clarity and self-reflection, you said, "At the risk of another charge, I'm going to leave it at that." Nothing has changed, Mr. Rhodes. Nothing has changed.

And the reality is, as you sit here today and based on the words that we heard you speak, the moment you are released, whenever that may be, you will be prepared to take up arms against your government, because -- not because you think you're an important person, not because you think the wrong President is in office, because you think that is an appropriate way to resolve conflict, and that is an appropriate way to have redress against the government when you think the law has not been applied the way you believe it should be.

And I'm not making this up. This is what you've said under oath.

You were asked, "Because to you, Mr. Rhodes, January 6th was just a battle in an ongoing war.

"Right.

"That's not correct."

You were asked: "From November 20th through January 2021, you repeatedly stated that, 'We are finding ourselves in a situation resembling that that the Founders found themselves in 1775, correct?"

"On the eve of conflict, not in conflict," you answered.

You then were asked: "What does that mean, other than we're about to enter into a war?"

Your answer: "Right, but in the future not

currently.

"Okay.

"I mean," you answered, "they lingered on the eve of conflict for quite a long time.

"Question: And you want to be part of" -- "You wanted to be part of that conflict, right?

"Answer: I hope to avoid that. I never had to ever take anyone's life in my entire life, fortunately. I hope never to have to.

"Question: And you and the Oath Keepers were prepared to take steps to alter or abolish this government if it didn't comply with what you believed to be constitutionally correct, right?

"Answer: We were prepared to take steps. We were prepared to walk the Founders' path, yes.

"Like I said, I hope -- I still hope that conflict can be avoided. I really do. When you have a government that steps outside of the Constitution, it puts you in a bad place."

American democracy doesn't work, Mr. Rhodes, if when you think the Constitution has not been complied with, it puts you in a bad place, because from what I'm hearing, when you find yourself in a bad place, the rest of us ought to. We are all then the objects of your plans to and your willingness to engage in violence. And we just cannot have

that in this country, and people need to understand that.

For all those reasons, it is the judgment of the Court that you, Mr. Rhodes, are hereby committed to the custody of the Bureau of Prisons for concurrent terms of 216 months -- that is, 18 years -- each on Counts 1, 3, and 7.

You are further sentenced to serve 36 months of supervised release as to Counts 1, 3, and 7, with such terms to run concurrently. In addition, you are ordered to pay a special assessment of $100 per count, for a total of $300.

While on supervision, you shall abide by the following mandatory conditions, as well as all the discretionary conditions recommended by the probation office in part D of the sentencing options of the presentence report, which are imposed to establish basic expectations for your conduct while on supervision.

The mandatory conditions include not committing any other federal, state, or local crime. You must not unlawfully possess a controlled substance. You must refrain from unlawful use of a controlled substance. You must submit to one drug test within 15 days of placement on supervision and at least two periodic drug tests thereafter as determined by the Court.

You must cooperate in the collection of DNA as directed by the probation officer. You must make

restitution in accordance with 18 U.S.C. 3663(a) and the orders of the Court that will be issued after judgment is entered.

The following special conditions will apply:

You must not associate, communicate, or otherwise interact with any known or unknown member of a terrorist organization or any other known or unknown criminal extremist group or individual. This includes persons who are or claim to be involved with violent acts or advocating for acts of violence and any persons who are located outside the United States without the approval of the probation officer.

If you inadvertently associate, communicate, or otherwise interact with a known terrorist or extremist group or individual, you must immediately report this to the probation officer.

You must seek the approval of the probation officer if you wish to access, view, or use any online social media.

You must not download any social media apps to your phone or computer. You must not access social media on any other device not approved by the probation office. Social media includes social media sites, chats services, blogs, instant messages, SMS, MMS, digital photos, et cetera.

You must not access, view, or possess any extremist media. This includes material such as literature photos, social media from groups or individuals who promote the use of violence to further an ideological or religious cause. If you inadvertently access, view, or possess such material, you must immediately report this to the probation office.

To ensure compliance with these conditions, I will permit and allow the probation office to monitor your computer. You must allow the probation office to conduct initial and periodic unannounced searches of any computers subject to computer monitoring.

You must allow the probation officer to install computer-monitoring software on any computer. This includes desks, laptops, mobile devices, smart watches, et cetera.

These searches shall be conducted to determine whether the computer contains any prohibited data or to -- prior to installation of the monitoring software, whether the monitoring software is functioning effectively after its installation, and whether there have been attempts to circumvent the monitoring software after its installation.

You must warn any other people who use these computers that their computers may be subject to searches pursuant to the condition. The probation officer may conduct a search pursuant to this condition only when

reasonable suspicion exists that there is a violation of a condition of supervision, that the computer or device contains evidence of this violation. Any search will be conducted at a reasonable time and in a reasonable manner.

You must not use any devices -- excuse me.

You must not use any services designed to encrypt, disguise, mask, or anonymize your online activities, such as Tor, I2P, Freenet, and others. You also shall not use any online gaming services or systems, including mobile device applications.

You shall not use any telecommunications applications, software products, such as Skype, Discord, TeamSpeak, et cetera, that specialize in providing chat and voice calls between computers, tablets, and mobile devices, absent authorization from the probation office.

You must provide the probation officer access to any requested financial information and authorize the release of that financial information. The probation office may share that with the United States Attorney's Office.

I will authorize that supervision of this matter be transferred to the district of residence; however, I will retain jurisdiction over this matter as I expect to still be here.

The restitution payments shall be made to the Clerk of the Court, and the Court will enter an order for

that purpose. They shall be made to the Architect of the Capitol. The financial obligations to the Court -- that is, the $300 -- are immediately payable to Clerk of the Court for the U.S. District Court here in Washington, D.C. Within 30 days of any change of address, you shall notify the Clerk of the Court of such change until such time as the financial obligation is paid in full.

The probation office may release the Presentence Investigation Report to all appropriate agencies, which includes the probation office in the approved district of residence in order to execute the sentence.

The treatment agency shall return the presentence report to Probation upon the defendant's completion or termination from treatment.

You do have the right to appeal your conviction, as well as the sentence that's been imposed, Mr. Rhodes. You shall file any notice of appeal within 14 days after the Court enters judgment. If you're unable to afford the cost of an appeal, you may request permission from the Court to file an appeal without cost to you. On appeal, you may apply for court-appointed counsel.

You also have the right to challenge your conviction pursuant to 28 U.S.C. 2255 where you can challenge the conviction that's been entered or the sentence imposed subject to the conditions, including time

limitations that the statute provides.

So that will be the sentence of the Court.

Are there any objections or anything else anybody would like to raise before we adjourn?

MR. LINDER: No, sir.

MS. RAKOCZY: No, Your Honor. Thank you.

THE COURT: Thank you, all, very much.

Mr. Rhodes, good luck to you.

COURTROOM DEPUTY: All rise.

The Court stands in recess.

(Proceedings concluded at 1:05 p.m.)

C E R T I F I C A T E

I, William P. Zaremba, RMR, CRR, certify that the foregoing is a correct transcript from the record of proceedings in the above-titled matter.

Date: May 31, 2023

William P. Zaremba, RMR, CRR

COURTROOM DEPUTY: [7] 3/2 63/14 63/17 108/24 109/2 109/5 127/9
MR. BRIGHT: [14] 12/8 13/25 14/9 41/2 41/5 41/21 42/2 45/10 45/12 47/11 48/2 58/13 60/13 96/10
MR. LINDER: [6] 52/3 52/6 53/4 55/20 89/1 127/5
MR. TARPLEY: [2] 60/18 60/21
MS. RAKOCZY: [13] 12/6 14/2 22/8 25/16 28/4 28/12 34/13 34/18 35/10 37/17 40/24 83/19 127/6
THE COURT: [38] 3/14 12/9 14/4 14/13 25/15 27/17 28/11 34/8 35/8 37/15 40/23 40/25 41/4 41/19 41/22 45/9 45/11 46/23 47/12 52/1 52/5 53/2 55/18 58/12 60/12 60/16 60/20 63/11 63/19 88/24 96/9 96/17 106/7 106/9 108/20 109/4 109/7 127/7
THE DEFENDANT: [4] 34/16 96/18 106/8 106/11

$

$100 [1] 122/10
$2 [1] 10/22
$2 million-plus [1] 10/22
$2,000 [1] 11/13
$300 [2] 122/10 126/3
$500,000 [1] 83/15

'

'21 [1] 32/5
'That [1] 71/23
'We [1] 120/18
'We're [1] 71/2
'Well [1] 72/16
'Yes.' [1] 15/24

1

10 [1] 80/6
10,000 [1] 52/14
100 [1] 72/8
10th [2] 17/12 39/12
11:00 a.m [1] 100/14
11:01 a.m [1] 63/16
11:15 [1] 63/13
11:19 a.m [1] 63/16
12 [4] 37/18 38/3 38/24 114/14
12 minutes [1] 56/8
12 years [1] 95/22
12-level [1] 38/17
120 [1] 92/15
1202.5 [1] 17/18
12:23 [1] 109/1
12:36 [1] 109/1
12th [2] 49/20 77/8
132 [3] 55/12 55/14 56/14
133 [4] 35/10 55/12 56/16 57/16
134 [1] 4/20
135 [3] 55/12 57/18 57/20
13th [1] 15/17
14 [4] 25/3 82/25 92/12 126/17
14-plus [1] 110/4
1460 [1] 2/12
14th [3] 16/7 49/20 77/7
15 [3] 63/12 93/21 122/21
1512 [2] 67/17 76/25
16th [1] 104/17
17 [2] 92/9 92/20
1775 [1] 120/20
18 [2] 93/22 122/5
18 U.S.C [1] 123/1
18 United States [1] 109/11
183-page [1] 44/1
1961 [1] 111/14
1996 [1] 81/8
19th [3] 51/2 56/24 76/14
1:05 [1] 127/11
1B1.3 [3] 22/15 22/19 23/1

2

2-point [1] 56/16
20 [4] 26/22 68/24 106/9 107/19
20-something [1] 26/24
20-year [1] 95/9
20001 [1] 2/17
2004 [3] 9/5 35/11 116/2
2005 [1] 116/3
2009 [1] 116/4
2014 [2] 4/21 116/3
2014 case [1] 8/19
2015 [1] 117/15
202 [2] 1/18 2/18
2020 [6] 16/7 17/6 64/25 85/23 88/6 119/11
2021 [1] 120/18
2023 [2] 1/5 128/7
2024 [2] 88/7 106/21
20579 [1] 1/17
20th [2] 62/5 120/17
21-CR-28 [1] 30/16
214 [2] 2/5 2/9
216 months [1] 122/5
22-15-1 [2] 1/4 3/3
2255 [1] 126/23
23 [1] 115/18
25 [6] 1/5 38/23 40/18 83/23 88/22 94/4
25-year [3] 90/10 90/11 93/20
252-7277 [1] 1/18
252-9900 [1] 2/5
262 [2] 83/14 109/9
28 [1] 30/16
28 U.S.C. 2255 [1] 126/23
28th [1] 46/13
29 [3] 15/12 24/14 64/7
29th [1] 17/6
2:24 p.m [1] 19/4
2:41 p.m [1] 19/4
2J1.2 [5] 3/24 25/12 82/12 82/21 82/25
2X5.1 [1] 82/8

3

30 [10] 19/16 26/20 53/7 53/7 53/9 53/24 68/24 84/21 91/19 91/20
30 days [1] 126/5
30 percent [1] 104/8
31 [1] 128/7
318 [1] 2/12
3249 [1] 2/18
327 [2] 83/14 109/9
3300 [2] 2/3 2/7
333 [1] 2/17
354-3249 [1] 2/18
3553 [8] 38/17 38/20 38/23 60/3 60/8 60/11 93/22 109/12
36 [2] 92/13 122/7
364 U.S. 587 [1] 111/16
3663 [1] 123/1
373 [1] 35/7
39 [1] 83/13
3A1.4 [2] 38/6 78/5
3B1.1 [3] 8/21 33/17 33/18
3E1.1 [1] 80/15
3rd [1] 36/12

4

4 years [1] 95/21
40 [2] 11/12 11/14
40,000 [2] 53/9 91/19
434 [1] 4/20
4409 [1] 71/21
450 [1] 92/7
450-some-odd [1] 92/8
47 [1] 30/9
48 [1] 67/2
487-1460 [1] 2/12
4K2.0 [1] 81/20

5

5,000 [1] 51/21
50,000 [1] 83/15
518 U.S. 81 [1] 81/8
537 [1] 13/16
548 [1] 13/12
549 [1] 13/12
57 [1] 80/3
570 [1] 13/12
572 U.S. 434 [1] 4/20
573 [1] 27/11
574 [1] 27/11
58 [1] 115/16
587 [1] 111/16
5H1.11 [1] 81/3
5K2.0 [1] 82/4

6

60 [3] 92/9 92/20 95/15
60-month [1] 95/16
601 [1] 1/17
67 [2] 40/7 80/4
6701 [2] 16/12 32/3
6749 [1] 17/11
6803.2 [1] 16/13
6923 [1] 33/7
6th [42] 10/14 10/15 17/12 18/19 20/19 21/5 24/12 26/22 28/9 28/22 36/12 36/19 39/12 39/17 51/4 60/23 66/9 66/13 68/9 70/6 71/13 72/23 76/13 77/9 80/24 81/19 84/8 84/10 87/8 88/18 89/25 90/15 91/13 99/22 100/14 110/3 114/20 114/23 118/23 119/3 119/14 120/14

7

700 [2] 2/4 2/8
71301 [1] 2/11
720-7777 [1] 2/9
7277 [1] 1/18
75219 [2] 2/4 2/8
7777 [1] 2/9
78 [1] 26/1
79 [1] 94/13

8

8 years [1] 95/21
81 [2] 81/8 94/13
819 [1] 2/11
864 F.3d 573 [1] 27/11
87 [1] 92/18

9

90 [4] 11/20 11/25 92/16 92/17
99.5 [1] 48/25
9900 [1] 2/5
9:39 [1] 1/6
9th [1] 92/6

A

a.m [4] 1/6 63/16 63/16 100/14
abetted [1] 22/17
abide [1] 122/11
abided [1] 77/12
ability [2] 60/7 77/23
able [2] 9/16 108/6
abolish [1] 121/11
about [97] 3/22 3/25 6/13 7/21 8/6 11/16 11/17 14/17 16/16 18/1 19/21 21/4 21/6 21/18 22/6 25/14 27/4 28/21 30/9 32/4 32/10 32/12 33/4 33/14 35/16 37/23 38/22 39/14 39/18 40/15 40/17 41/24 42/17 43/25 46/19 48/7 48/25 50/2 51/18 51/21 52/9 53/7 54/16 54/22 55/1 56/4 61/22 61/24 64/16 64/21 65/9 67/13 69/10 73/3 73/4 74/23 76/2 77/15 80/23 81/12 81/16 85/11 85/23 88/15 89/2 89/19 90/2 90/4 93/5 93/17 94/4 94/8 94/12 94/14 98/19 100/15 101/18 104/7 105/18 106/6 106/9 106/14 106/22 107/2 108/3 108/3 110/18 110/24 113/16 113/23 113/24 114/18 115/6 115/14 117/22 117/25 120/24
above [1] 128/4
above-titled [1] 128/4
absence [1] 69/21
absent [1] 125/15
absolute [1] 63/4
absolutely [2] 61/19 114/1
absolve [2] 6/3 6/11
absolved [1] 7/17
abundance [1] 45/19
abundantly [1] 68/12
accept [2] 21/4 48/20
acceptable [2] 117/19 119/9
acceptance [3] 80/15 80/19 81/1
access [7] 57/3 75/2 123/18 123/21 124/1 124/5 125/16
accomplish [2] 74/4 111/25
accomplished [2] 59/5 115/20
accomplishing [1] 117/19
accomplishments [1] 116/7
accordance [1] 123/1
according [3] 18/1 44/9 80/5
account [1] 110/8
accurate [1] 44/6
accurately [1] 47/2
accused [1] 104/20
achieve [3] 36/5 86/13 109/13
acknowledge [2] 39/1 39/2
acknowledged [1] 61/7
acknowledging [2] 26/2 37/21

A

acquaintance [1] 53/17
acquitted [2] 11/6 114/16
across [16] 22/11 26/24 27/4 31/12 39/6 78/24 84/22 85/12 85/12 86/1 88/16 97/24 98/8 99/11 100/8 103/9
act [16] 15/22 16/9 16/21 16/22 17/3 53/12 57/25 61/1 61/10 62/4 62/5 63/6 66/11 85/18 105/4 107/1
Act's [2] 18/8 18/9
acted [1] 30/1
action [2] 50/16 111/19
actions [17] 23/18 39/8 43/22 46/11 52/9 65/11 65/12 65/15 66/4 66/25 67/1 71/12 94/24 96/3 113/8 114/7 114/8
active [3] 31/6 31/20 85/2
actively [1] 26/4
activities [4] 33/21 34/7 95/7 125/7
activity [17] 12/21 22/20 22/23 22/23 22/24 23/5 23/15 24/4 33/21 57/21 57/22 58/3 58/5 63/23 64/22 65/17 65/19
actors [1] 5/25
acts [13] 22/16 22/21 23/3 23/4 23/15 23/20 67/9 74/16 82/16 113/10 115/9 123/9 123/10
actual [10] 18/12 19/22 31/18 34/4 36/15 74/12 78/25 79/8 99/12 110/19
actually [13] 4/8 4/9 10/18 11/22 26/22 31/22 39/16 51/19 60/1 67/22 74/10 99/18 101/24
add [2] 13/21 60/15
added [1] 8/11
addition [5] 73/17 94/13 95/18 109/10 122/9
additional [13] 4/7 4/16 7/18 13/18 76/1 76/3 79/20 79/21 79/21 79/22 83/4 83/10 83/11
address [12] 15/1 19/20 29/14 35/19 40/20 41/22 42/3 42/15 58/7 60/5 119/10 126/5
addressed [4] 41/13 55/14 88/4 108/10
addresses [2] 56/14 57/16
addressing [2] 43/6 93/22
adds [1] 15/25
adequate [1] 109/20
adequately [2] 81/21 81/23
adhere [1] 47/14
adjourn [1] 127/4
adjourned [2] 75/18 75/19
adjudicatory [1] 26/16
adjustment [6] 33/17 34/3 39/21 41/13 46/19 50/8
adjustments [3] 22/12 23/16 24/2
administration [15] 25/18 26/11 26/12 55/16 56/12 65/24 73/22 75/13 75/16 76/8 83/3 83/5 96/24 97/24 98/15
admitted [2] 20/15 103/17
admittedly [1] 45/2
admonished [3] 49/14 51/15 72/24
admonishments [1] 54/22
adopt [1] 7/4
adults [1] 115/19
advance [3] 46/24 69/3 69/4
advice [3] 20/23 21/4 21/6
Advocacy [1] 87/17
advocate [2] 87/22 88/1
advocated [2] 36/8 85/4
advocates [1] 24/25
advocating [2] 39/8 123/9
affect [2] 78/14 78/20
affirmed [1] 40/11
afford [2] 109/20 126/18
afraid [1] 97/5
after [33] 13/2 13/4 15/9 17/12 20/19 21/18 24/23 28/9 35/24 37/3 45/2 52/10 54/2 54/2 55/2 61/13 71/12 71/19 71/25 77/14 85/21 88/9 95/21 95/22 103/23 116/16 117/7 118/22 119/3 123/2 124/19 124/21 126/17
aftermath [1] 21/5
afternoon [1] 28/22
afterwards [1] 72/21
again [20] 8/14 31/22 35/12 45/4 52/21 58/14 60/13 64/8 67/14 74/22 76/4 76/10 78/1 81/17 90/6 90/17 98/12 104/22 109/3 114/23
against [24] 6/6 7/3 36/25 72/20 74/6 75/2 78/15 79/2 82/10 85/8 88/18 92/5 94/7 102/2 102/4 107/3 107/7 107/10 108/12 108/20 108/24 109/2 109/10 111/11 113/4 113/5 113/11 116/24 117/1 117/11 117/12 120/4 120/8
agencies [5] 27/13 27/15 28/7 28/17 126/9
agency [1] 126/12
agenda [1] 105/9
Agent [1] 28/19
aggressive [2] 50/5 50/16
aghast [1] 62/25
ago [3] 88/3 88/14 92/12
agree [4] 14/21 17/18 37/14 79/25
agreed [2] 55/15 118/21
agreement [5] 66/19 73/24 78/24 82/11 111/17
ahead [2] 55/13 103/5
ahold [2] 70/19 70/21
aid [2] 13/13 13/15
aided [2] 2/19 22/17
aim [1] 112/6
airborne [1] 115/24
Al [1] 94/20
alarming [1] 36/13
Alexander [1] 100/24
Alexander's [1] 101/4
Alexandra [2] 1/15 3/6
Alexandra Hughes [1] 3/6
Alexandria [1] 2/11
Ali [4] 27/9 27/25 100/24 101/4
Ali Alexander [1] 100/24
Ali Alexander's [1] 101/4
all [118] 3/14 4/21 6/3 6/8 8/20 9/18 9/23 9/25 10/24 11/9 11/13 11/16 11/21 12/3 12/9 13/6 13/14 14/5 14/14 14/14 18/16 21/2 21/9 22/4 22/21 23/3 23/20 28/17 29/20 32/5 35/8 35/13 37/13 38/9 39/19 40/15 40/25 42/17 45/14 46/4 49/2 49/5 49/24 49/25 51/3 52/1 55/23 57/12 58/6 60/7 60/16 61/24 62/6 62/20 63/12 63/14 64/9 65/12 67/19 68/8 69/23 72/22 73/1 73/3 75/20 77/14 79/4 80/12 82/11 82/22 86/1 87/7 89/9 89/10 89/16 89/17 91/7 91/11 92/1 93/1 94/11 94/20 97/23 97/24 98/4 99/7 99/8 99/22 99/22 99/23 103/7 103/11 103/14 103/14 104/4 104/10 104/12 104/25 105/4 107/10 108/12 108/20 108/24 109/2 109/10 112/11 112/11 114/22 116/17 121/24 122/2 122/12 126/9 127/7 127/9
All right [3] 12/9 37/13 108/20
allege [1] 56/21
alleged [2] 54/2 55/2
allegedly [1] 94/17
alleging [1] 104/18
allocution [1] 41/25
allocutions [2] 13/3 83/17
allow [4] 96/11 124/9 124/10 124/13
allows [1] 60/24
allude [1] 119/9
alluded [1] 35/21
almost [2] 49/2 49/3
alone [3] 27/5 28/24 110/11
along [6] 44/6 72/9 74/22 75/1 84/16 101/11
Alpers [4] 17/13 17/24 119/2 119/3
already [13] 20/10 43/4 49/20 53/24 55/15 60/24 62/8 62/24 82/4 100/10 101/2 101/20 115/10
also [58] 3/10 13/17 13/21 16/18 17/3 17/14 17/15 17/25 20/1 20/10 22/19 29/24 30/4 32/22 33/1 33/13 34/19 35/3 41/14 43/18 45/2 45/20 45/22 48/21 52/22 53/5 53/8 56/17 59/9 61/17 64/15 65/4 65/5 72/9 73/18 73/23 74/9 74/12 74/14 75/15 77/20 81/2 81/20 82/12 82/18 87/4 96/22 100/22 102/3 102/8 102/10 103/3 105/14 109/22 110/22 119/12 125/8 126/22
alter [1] 121/11
alternate [1] 40/19
alternative [4] 6/13 6/18 6/25 73/17
although [5] 11/22 30/15 80/17 82/4 83/22
always [4] 43/14 102/1 102/4 106/25
am [9] 8/15 9/19 12/4 13/24 64/10 64/20 64/21 81/14 82/11
Amendment [2] 96/21 100/12
AMERICA [2] 1/3 3/4
American [13] 65/22 79/23 84/21 86/24 88/12 88/20 94/23 96/6 108/17 110/21 113/3 117/12 121/20
Americans [5] 59/8 84/10 90/13 94/22 110/20
AMIT [2] 1/9 63/18
among [1] 113/2
amount [1] 29/2
amounted [1] 27/14
amounts [1] 28/16
ample [2] 21/24 66/23
amplify [1] 61/17
analogue [1] 82/9
analogy [1] 40/13
analysis [8] 4/1 4/22 4/24 5/8 5/10 5/18 8/13 10/7
anger [2] 37/4 86/9
anonymize [1] 125/7
another [8] 32/14 33/11 68/24 72/14 88/7 95/22 114/23 119/23
answer [8] 4/18 7/9 72/4 72/12 119/20 120/25 121/7 121/14
answered [3] 93/17 120/22 121/3
answers [1] 4/17
Anthem [1] 50/15
Anthony [1] 75/3
anticipated [1] 96/14
Antifa [12] 97/10 97/11 97/17 97/25 98/3 98/19 98/25 99/1 99/24 100/1 100/4 100/7
any [69] 4/14 6/9 7/14 10/11 10/24 11/18 12/23 15/21 16/1 19/24 19/25 21/19 22/7 25/13 41/8 41/25 44/15 44/15 47/8 48/8 49/5 51/24 56/2 56/3 56/10 59/5 61/21 62/1 63/6 67/10 68/2 69/11 72/24 73/4 74/20 89/20 89/21 99/9 99/22 102/23 103/8 103/13 103/24 104/9 109/21 111/10 113/6 116/12 122/18 123/6 123/7 123/10 123/18 123/20 123/22 124/1 124/11 124/14 124/17 124/22 125/3 125/5 125/6 125/8 125/11 125/17 126/5 126/17 127/3
anybody [14] 5/17 47/5 47/13 55/3 67/9 70/7 92/25 99/10 99/10 99/11 100/11 113/17 118/10 127/3
anyone [12] 32/16 50/25 61/9 62/1 62/9 72/25 99/2 101/15 101/17 103/10 103/10 117/25
anyone's [1] 121/8
anything [11] 9/19 12/5 13/24 43/20 46/7

A

anything... [6] 50/18 82/2 98/19 103/11 104/1 127/3
anyway [1] 95/7
anywhere [1] 94/25
apart [1] 19/16
apologize [2] 45/10 58/14
appeal [6] 40/10 126/15 126/17 126/19 126/20 126/20
APPEARANCES [2] 1/13 1/20
appearing [1] 3/12
applicable [3] 8/7 83/23 112/25
application [3] 6/2 22/6 59/21
applications [3] 12/24 125/10 125/12
applied [8] 7/25 8/2 10/8 38/6 38/25 79/1 114/3 120/9
applies [9] 22/11 26/14 33/17 58/6 73/23 75/14 75/15 78/4 78/16
apply [19] 5/10 5/16 22/13 34/3 38/3 40/5 57/17 58/18 59/13 73/23 75/23 76/23 76/24 77/1 77/2 80/21 81/10 123/4 126/21
appoint [1] 107/23
appointed [1] 126/21
apportioned [1] 80/5
Appreciate [1] 52/1
approach [4] 7/7 11/16 33/3 33/10
approaching [2] 58/15 114/23
appropriate [21] 11/18 31/11 32/23 34/5 37/23 38/19 38/20 38/23 40/19 65/12 79/11 80/2 80/10 80/11 81/5 82/9 82/12 82/23 120/7 120/8 126/9
appropriately [2] 60/2 81/4
approval [2] 123/11 123/17
approved [5] 33/1 69/18 73/15 123/22 126/10
approving [1] 33/10
apps [1] 123/20
April [1] 92/6
Architect [1] 126/1
are [78] 3/16 4/13 5/22 6/14 6/19 8/5 9/17 10/13 10/18 11/8 14/15 14/16 15/13 16/13 16/14 16/16 18/20 19/3 19/6 21/8 25/19 29/13 29/22 32/24 35/4 38/5 40/14 48/7 48/8 52/3 52/5 68/1 77/9 77/19 80/5 80/19 81/23 82/11 82/11 83/25 84/14 88/12 88/14 90/13 94/2 96/20 99/8 101/16 107/10 109/8 109/9 109/11 109/15 111/4 111/5 111/7 111/8 113/21 114/4 114/7 114/7 114/7 114/9 114/10 114/19 118/3 118/18 120/3 120/18 121/24 122/3 122/7 122/9 122/15 123/9 123/10 126/3 127/3
area [6] 66/16 97/18 100/16 100/22 101/5 103/3
Area 7 [1] 100/16
Area 8 [3] 100/22 101/5 103/3
areas [1] 27/2
aren't [2] 94/25 114/6
arguably [1] 24/15
argue [2] 43/19 56/7
argued [1] 116/9
arguing [1] 107/19
argument [11] 12/19 37/6 38/4 38/16 41/25 43/9 48/25 57/7 59/12 62/17 104/24
arguments [5] 12/23 13/3 22/5 57/15 58/19
Arizona [2] 31/3 116/2
armed [6] 25/1 25/6 36/16 39/6 98/9 99/3
armor [2] 99/24 100/3
arms [5] 18/2 66/6 77/18 114/5 120/4
around [3] 26/1 39/20 105/13
arrangements [1] 76/16
arrested [1] 16/4
arrests [1] 92/13
arsenal [4] 20/8 31/21 74/2 84/22
Article [2] 107/15 107/23
Article II [2] 107/15 107/23
articulated [4] 25/19 38/21 59/12 76/6
articulating [1] 39/1
as [172]
ascribe [3] 65/12 71/4 116/12
aside [3] 28/15 28/18 59/21
ask [17] 12/13 15/3 27/17 34/8 41/2 47/10 53/13 60/10 63/3 89/3 93/4 94/2 95/14 95/15 95/25 96/1 106/10
asked [16] 8/10 15/20 19/12 68/2 71/18 72/1 72/2 72/10 93/14 118/7 118/8 118/9 119/19 120/13 120/17 120/23
asking [7] 10/22 22/2 38/5 40/8 40/14 83/20 83/25
aspect [2] 31/20 36/25
aspects [1] 33/1
aspiring [1] 86/3
assault [5] 56/3 56/10 75/4 92/23 105/21
assaulting [2] 92/14 92/21
assaultive [2] 93/10 110/6
assaults [3] 93/7 94/11 111/13
assertion [2] 46/6 46/20
assessed [1] 92/5
assessment [1] 122/10
assets [2] 33/21 34/7
assigning [1] 101/24
assist [1] 32/12
associate [2] 123/5 123/13
association [1] 111/23
assume [1] 11/22
assure [1] 80/8
assured [1] 117/7
atop [1] 65/10
att.net [1] 2/12
attached [1] 28/25
attack [7] 24/11 24/12 24/17 26/23 88/20 97/10 98/3
attacked [1] 98/23
attacking [2] 98/19 105/2
attained [1] 111/21
attainment [1] 111/24
attempt [2] 26/5 96/25
attempting [2] 39/25 97/17
attempts [2] 85/14 124/20
attend [2] 97/4 101/4
attendance [1] 88/8
attended [2] 98/24 116/1
attention [1] 71/25
attorney [1] 27/1
ATTORNEY'S [2] 1/16 125/19
attorneys [1] 27/1
attract [1] 86/12
attributable [1] 12/23
attribute [2] 116/7 116/8
attributed [2] 11/2 104/12
attributes [2] 116/6 116/23
Augustine [1] 48/12
Austin [1] 91/13
authorities [2] 5/24 6/24
authority [5] 34/25 65/1 71/5 87/18 112/15
authorization [1] 125/15
authorize [2] 25/13 125/20
authorized [1] 71/11
authorizing [1] 71/5
availability [1] 6/25
available [2] 7/18 112/18
Avenue [3] 2/3 2/7 2/17
avenues [1] 26/14
avoid [1] 121/7
avoided [1] 121/17
avoiding [1] 110/13
award [4] 10/21 10/25 11/18 11/20
aware [6] 22/14 24/24 45/17 51/4 66/25 72/11

B

back [33] 11/21 18/2 20/11 36/13 36/13 42/17 46/24 49/15 49/16 50/6 50/13 51/1 51/13 51/16 55/23 56/17 58/9 61/12 63/13 85/24 89/25 90/12 98/2 98/6 98/7 98/12 98/18 99/19 104/16 105/13 108/23 117/14 119/18
backdrop [1] 103/6
background [4] 7/2 64/2 111/9 116/25
backs [1] 106/3
bad [3] 121/18 121/22 121/23
banc [1] 9/2
bank [1] 93/6
BARRETT [2] 2/3 2/16
Base [1] 82/25
baseball [1] 103/13
based [15] 11/4 18/7 42/5 49/24 59/23 61/10 65/7 76/6 78/18 81/21 81/22 89/11 109/9 117/22 120/2
basic [2] 13/6 122/15
basically [1] 102/13
basis [9] 23/16 40/3 41/13 43/17 46/17 49/5 51/6 51/25 80/16
bat [1] 103/13
bath [1] 117/14
Battiste [1] 94/19
battle [2] 94/19 120/14
battlefield [1] 62/15
bay [1] 68/14
be [149]
bear [2] 104/5 118/17
bearing [1] 103/22
beats [1] 93/7
became [1] 46/13
because [68] 4/9 5/16 7/14 11/8 11/9 11/23 15/15 23/22 34/3 34/5 36/15 41/10 42/10 46/18 51/19 54/11 59/14 60/3 62/6 63/1 65/7 65/10 67/17 67/24 68/4 69/9 70/8 70/17 73/1 73/12 74/14 79/16 82/10 82/14 82/18 82/22 83/25 95/15 96/1 96/24 99/13 99/24 100/1 100/3 100/22 101/12 101/19 102/25 105/10 105/25 107/10 107/19 110/10 113/19 114/2 114/3 114/10 114/11 114/11 114/14 118/6 118/14 120/4 120/4 120/5 120/6 120/13 121/22
become [3] 72/10 79/7 86/6
becomes [2] 11/7 51/4
becoming [1] 84/24
been [67] 3/21 10/21 12/17 13/19 18/24 25/21 26/8 38/5 38/25 40/10 40/12 42/13 42/16 42/17 42/25 44/24 44/25 45/15 45/16 47/17 48/5 50/2 51/6 51/20 55/6 62/6 63/5 63/8 65/4 69/10 70/6 75/22 77/17 80/25 80/25 82/9 84/9 85/5 87/18 89/5 89/6 92/5 92/7 92/8 92/8 95/6 95/16 99/6 101/20 104/14 105/8 105/8 105/9 106/9 108/13 110/3 115/9 116/9 116/15 117/3 117/4 119/8 120/9 121/21 124/20 126/16 126/24
before [18] 1/9 12/5 30/2 42/19 48/22 51/22 55/11 59/12 62/25 87/7 87/20 88/3 89/2 91/12 97/4 102/6 107/13 127/4
begin [3] 3/18 22/9 83/18
beginning [2] 24/22 110/1
behalf [4] 3/10 42/10 96/12 96/16
behave [1] 21/5
behavior [2] 103/9 105/11
being [19] 9/16 16/3 31/18 31/19 32/11 32/15 39/7 42/2 53/16 54/21 55/5 68/2 92/14 95/4 97/13 97/13 104/20 105/5 107/10
belief [1] 18/22
beliefs [2] 18/21 114/10
believe [37] 13/25 21/3 23/19 29/16 38/22 39/19 42/10 42/22 53/20 55/14 55/23 56/3 57/13 58/25 59/15 60/3 60/4 60/14 70/10 70/14 72/7 77/8 81/12 84/15

B

believe... [13] 87/1 88/18 89/12 89/15 89/18 89/20 89/21 90/23 90/23 95/25 107/6 114/4 120/9
believed [7] 15/15 30/5 44/5 55/12 107/13 112/23 121/12
benefit [1] 13/8
Bennie [2] 30/16 104/17
Bennie Parker [1] 30/16
bent [1] 97/21
Berkeley [1] 98/17
Berry [2] 18/16 71/2
Berry's [1] 71/3
best [7] 41/18 62/18 86/10 93/17 96/11 102/23 107/5
better [5] 21/20 51/20 94/2 113/25 115/7
between [8] 65/21 90/15 101/10 102/18 104/18 105/11 115/22 125/14
beyond [4] 20/4 33/2 36/12 68/2
Biden [7] 15/15 15/23 16/2 18/4 21/19 21/23 114/12
Biden's [1] 16/1
big [3] 48/1 48/3 94/3
bit [9] 15/6 27/18 28/25 29/14 31/4 39/13 42/24 46/25 54/25
bizarre [1] 104/10
black [4] 97/16 104/21 105/1 105/3
black bloc [1] 97/16
blackest [2] 115/10 115/11
bleach [1] 100/1
bleed [1] 115/14
bloc [1] 97/16
block [2] 97/17 100/15
blocks [1] 97/16
blogs [1] 123/24
blood [1] 117/14
bloody [3] 16/10 36/11 39/10
blow [1] 39/23
blowing [3] 39/5 39/22 94/22
bodies [1] 115/5
body [3] 99/24 100/3 104/1
body-slam [1] 104/1
bombast [1] 18/12
bones [1] 90/4
book [1] 87/12
both [18] 5/3 12/20 20/5 22/6 22/16 24/14 24/16 29/15 40/18 47/21 57/7 65/15 76/2 78/22 89/17 106/15 110/5 111/19
bottles [1] 99/25
bound [2] 8/15 9/5
box [1] 93/21
boys [6] 52/19 99/14 104/19 104/25 105/22 105/23
branch [2] 107/21 119/18
Brandenburg [1] 21/12
breach [2] 24/10 43/13
breached [4] 56/1 91/17 95/5 95/5
breaching [1] 25/5
break [5] 56/9 56/9 60/17 61/12 108/22
breaking [1] 68/22
breaths [1] 114/22
Brian [1] 13/19
Brian Hill [1] 13/19
bricks [1] 99/25
brief [4] 29/16 55/8 58/13 80/3
briefly [1] 41/3
BRIGHT [13] 2/3 2/7 3/8 9/14 14/5 52/2 52/7 54/20 58/7 60/12 67/13 69/19 89/3
bring [9] 31/9 52/18 54/10 68/24 77/18 89/20 89/22 101/1 118/7
bringing [4] 32/16 66/21 76/16 103/2
broad [2] 64/19 113/18
brothers [1] 104/12
brought [14] 17/17 17/21 30/21 31/3 66/16 66/18 69/13 74/3 78/24 90/20 91/20 91/20 110/2 119/4
brush [1] 113/18
building [20] 19/7 19/20 25/5 28/22 39/5 39/22 39/23 42/8 43/21 44/13 46/8 47/17 68/22 69/8 69/9 71/20 76/11 76/19 79/1 112/9
buildings [1] 100/16
builds [1] 4/23
built [2] 4/10 5/2
Bundy [1] 117/6
Bundy ranch [1] 117/6
Bureau [1] 122/4
buried [2] 89/5 89/6
burner [1] 11/21
Burrage [2] 4/24 5/11
business [1] 22/5

C

cache [1] 20/11
calculated [7] 27/19 36/3 36/15 36/18 36/23 37/7 78/13
calculation [6] 13/2 79/17 79/20 82/6 83/16 109/9
calculations [1] 63/25
Caldwell [1] 31/7
call [33] 18/25 19/23 19/25 42/16 43/19 44/16 44/19 46/7 47/21 47/22 47/24 49/6 49/24 51/6 52/8 52/11 54/3 54/21 55/2 55/3 55/23 55/24 58/10 67/18 67/24 71/8 72/18 76/21 78/3 79/19 99/16 102/10 106/14
Callanan [1] 111/15
called [9] 16/20 18/7 18/18 39/16 85/8 91/12 111/15 118/7 118/16
calling [3] 39/14 54/8 87/18
calls [4] 14/11 33/8 70/21 125/14
calmly [1] 50/10
came [13] 19/15 44/23 53/6 53/8 66/2 68/11 74/21 77/12 77/13 90/14 90/15 101/21 118/6
campaign [2] 88/10 88/10
can [37] 5/8 5/10 5/12 8/2 10/17 11/9 11/21 14/5 20/16 27/17 27/19 30/21 32/16 34/8 37/16 38/3 40/4 40/20 45/25 48/20 52/15 55/25 56/7 59/5 60/5 69/16 79/9 87/17 91/25 93/24 95/23 107/5 113/3 113/23 113/24 121/17 126/23
can't [6] 11/11 13/22 16/5 79/6 90/22 93/18
cannot [5] 6/16 108/7 114/1 114/1 121/25
cap [1] 79/9
capitalized [1] 86/4
Capitol [55] 10/22 11/3 18/25 19/1 19/6 19/7 19/9 19/10 24/11 24/12 24/17 24/18 26/23 28/21 43/13 44/9 45/23 47/17 47/21 52/15 53/21 53/23 54/10 54/18 54/24 56/2 57/4 62/22 63/1 68/13 68/18 68/22 68/25 69/13 69/18 70/22 71/20 73/16 76/4 77/12 77/13 77/13 77/14 92/24 93/1 95/3 95/5 100/22 100/23 101/4 101/9 102/14 105/13 115/2 126/2
Capitol building [4] 19/7 47/17 68/22 71/20
captain [2] 28/20 31/4
Captain Ortega [1] 28/20
captured [2] 47/2 79/15
car [3] 6/6 6/8 6/10
Cardinal [1] 109/1
care [1] 109/22
Carolina [2] 33/5 100/19
carried [2] 112/17 114/4
carries [1] 7/24
Carrion [1] 74/20
carry [3] 7/12 66/17 98/4
case [64] 3/3 4/9 4/21 4/24 6/22 7/14 8/5 8/18 8/19 8/19 9/23 9/24 9/24 16/20 23/21 24/2 25/25 26/6 27/9 27/11 27/16 27/25 30/4 30/15 30/16 31/7 31/12 31/15 34/11 34/20 35/6 35/6 35/8 35/11 35/15 35/15 35/22 36/6 40/5 40/6 40/6 40/10 48/25 50/7 52/21 57/15 61/24 79/23 80/3 80/4 80/10 80/11 84/14 85/15 85/22 88/4 89/5 89/6 92/13 93/13 106/16 107/17 111/15 113/6
cases [15] 5/12 8/25 14/15 26/24 27/2 29/15 94/15 94/20 94/21 110/3 110/5 110/9 110/15 110/16 110/18
categories [1] 15/1
category [2] 15/7 83/14
caught [6] 101/8 101/13 101/18 102/24 103/4 103/5
causal [6] 6/14 6/17 6/19 6/25 7/4 26/9
causation [11] 4/1 4/10 4/10 5/9 5/15 5/23 8/2 8/4 10/8 10/9 26/2
cause [26] 4/15 4/22 5/3 5/4 5/4 5/7 5/8 5/20 6/2 6/4 6/10 7/16 7/16 7/24 24/20 39/3 39/4 39/8 69/20 74/7 74/9 74/14 76/5 90/25 91/21 124/5
caused [9] 10/4 22/18 25/9 26/23 90/24 91/1 91/2 91/3 104/9
causing [2] 6/11 83/1
caution [1] 45/19
celebrated [1] 119/1
Center [2] 94/22 99/8
century [1] 48/10
certain [3] 6/19 74/13 79/6
certainly [25] 5/20 7/20 7/21 16/24 19/3 20/3 21/11 29/3 30/2 36/2 36/2 38/1 39/24 41/21 59/11 59/17 68/9 69/19 71/9 72/19 76/9 77/18 78/16 81/17 110/7
certification [13] 40/1 43/1 46/9 52/17 53/10 53/11 53/19 53/22 54/5 54/13 58/24 61/2 105/3
Certified [1] 2/15
certify [1] 128/2
cetera [4] 10/23 123/25 124/15 125/13
CH [1] 2/16
chain [7] 26/9 30/6 31/23 31/24 32/4 32/24 77/3
challenge [3] 20/7 126/22 126/24
challenged [1] 29/9
challenging [4] 25/10 35/22 105/2 115/16
chamber [1] 75/3
chance [2] 52/16 66/9
change [8] 87/2 88/14 89/20 89/22 106/19 106/21 126/5 126/6
changed [3] 107/20 119/24 119/25
changes [1] 15/4
changing [1] 84/15
chapter [2] 31/18 33/23
character [1] 104/15
characteristic [3] 25/12 25/17 82/20
characteristics [4] 22/12 23/17 109/17 115/13
characterization [1] 99/7
characterizing [1] 108/12
charge [6] 30/3 101/24 102/1 102/11 112/17 119/23
charged [2] 56/3 80/25
charismatic [1] 118/3
charitably [1] 81/15
charitably-minded [1] 81/15
chart [2] 92/6 94/7
chastise [1] 47/5
chat [9] 16/8 18/20 19/5 20/22 32/5 61/18 67/3 67/4 125/13
chats [8] 18/20 72/25 85/3 85/17 101/14 101/15 102/15 123/23
Chi [1] 16/9
Chi-Com [1] 16/9
Chief [1] 25/25
child [4] 9/25 10/3 10/4 10/17
childhood [1] 115/17
children [4] 97/9 115/18 117/11 117/23
chilling [1] 39/11
choice [1] 102/5
choose [7] 48/6 48/13 48/18 56/18 57/5 57/13 59/18
chooses [1] 56/18
choosing [1] 48/8

C

chose [2] 46/10 51/12
Christian [1] 48/10
Christopher [1] 74/24
Circuit [10] 4/8 4/11 8/12 8/14 8/24 9/5 27/11 34/20 35/11 40/11
circumstance [2] 7/10 80/21
circumstances [14] 5/9 6/20 6/22 7/1 8/4 8/5 75/22 80/20 81/21 81/23 82/1 109/16 110/16 111/5
circumvent [1] 124/21
citation [1] 4/7
citations [1] 30/8
cite [4] 6/24 27/9 40/5 44/2
cited [5] 8/16 8/19 29/15 35/6 80/3
citing [1] 8/18
citizen [2] 86/25 93/9
citizens [3] 84/21 86/25 114/2
city [1] 66/18
civic [4] 81/5 81/14 113/23 116/15
civic-minded [1] 116/15
civic-mindedness [1] 81/5
civil [8] 16/11 18/12 20/14 36/11 39/10 39/15 65/22 112/14
Civil War [4] 20/14 36/11 39/10 112/14
Civil War/revolution [1] 18/12
civilian [2] 78/12 86/2
claim [1] 123/9
clarification [4] 41/2 51/25 58/24 59/1
clarifications [1] 58/19
clarified [3] 34/24 43/12 43/14
clarify [5] 15/21 41/17 42/9 51/17 100/9
clarity [1] 119/22
Clark [2] 8/17 8/18
clause [1] 78/16
cleanup [2] 28/17 76/2
clear [18] 20/3 21/22 28/21 29/7 33/23 43/17 45/5 53/2 54/17 55/9 56/24 68/12 74/23 79/13 95/2 103/7 113/16 117/16
cleared [2] 50/4 70/14
clearly [12] 25/7 33/9 59/23 60/6 64/8 67/8 69/12 73/3 76/12 76/24 79/4 80/25
Clerk [3] 125/25 126/3 126/5
Clerked [1] 116/2
client [2] 57/14 60/16
cliff [2] 6/8 6/10
clock [1] 11/24
close [7] 39/7 39/10 78/3 90/10 96/12 99/1 117/8
closed [1] 50/2
closer [1] 69/15
closing [7] 48/22 48/22 57/7 57/15 59/2 95/2 108/16
co [18] 5/19 23/21 31/24 34/2 38/11 65/13 65/15 66/4 66/11 66/16 67/2 74/1 74/15 77/11 84/17 85/14 86/8 86/11
co-conspirator [1] 5/19
co-conspirators [13] 23/21 31/24 34/2 38/11 65/13 65/15 66/4 66/11 66/16 67/2 74/1 77/11 85/14
co-conspirators' [2] 86/8 86/11
co-defendants [2] 74/15 84/17
Code [1] 109/12
Code 3553 [1] 109/12
coerce [3] 36/18 78/11 84/2
coercion [5] 36/4 36/24 37/8 78/15 78/22
coercive [1] 59/15
coincidence [5] 19/15 48/1 48/3 48/19 52/8
collection [1] 122/24
collective [3] 14/15 111/17 114/22
collectively [1] 117/1
college [1] 115/22
Colombia [1] 50/21
COLUMBIA [2] 1/1 114/15
Columbus [2] 11/4 74/21
Columbus Doors [2] 11/4 74/21
Com [1] 16/9
combat [1] 110/20
Combination [1] 112/2
combine [1] 47/20
combined [3] 6/1 6/8 74/8
come [27] 17/10 19/5 19/8 19/13 39/7 68/17 68/24 69/22 76/3 77/6 77/7 77/11 77/14 84/14 90/10 91/13 94/2 98/2 101/16 101/16 101/21 102/21 102/21 109/6 116/11 118/11 118/12
comes [3] 14/16 39/7 39/10
comfort [1] 9/16
coming [5] 18/11 32/6 64/20 88/9 101/11
comings [1] 23/8
command [5] 30/6 30/23 32/11 32/17 103/19
commanded [2] 22/17 31/20
commanding [1] 91/17
comment [3] 33/18 72/2 100/25
Comment Note 2 [1] 33/18
comments [2] 37/5 80/23
commission [3] 7/13 37/21 112/3
commit [1] 113/3
committed [3] 62/17 113/10 122/3
committing [1] 122/17
common [5] 18/17 66/11 82/16 82/17 112/24
communicate [2] 123/5 123/13
communicated [1] 44/8
communicating [1] 95/4
communication [3] 43/1 43/7 65/25
communications [4] 49/22 66/3 68/8 68/12
communicator [1] 73/2
Communist [1] 16/5
community [1] 95/10
comparative [1] 94/4
comparators [1] 110/9
compare [2] 27/8 72/20
comparisons [1] 65/21
compatriots' [1] 78/20
compelling [3] 17/4 18/15 118/4
compilation [1] 110/2
completed [2] 61/14 115/24
completely [4] 23/6 51/6 57/16 104/21
completion [1] 126/13
complex [1] 111/25
compliance [1] 124/8
compliant [1] 40/18
complied [1] 121/21
comply [1] 121/12
component [1] 8/13
computer [8] 2/19 123/21 124/10 124/12 124/14 124/14 124/17 125/2
computer-aided [1] 2/19
computer-monitoring [1] 124/14
computers [4] 124/11 124/23 124/23 125/14
concept [6] 5/3 5/4 34/24 43/9 50/8 59/23
concepts [1] 113/2
concern [4] 94/1 101/6 101/8 102/20
concerned [4] 69/9 69/23 101/18
concerning [2] 3/20 12/24
concerns [3] 3/23 4/22 14/17
Concerted [1] 111/19
conclude [6] 8/4 13/4 18/5 21/25 22/1 69/16
concluded [7] 15/11 17/5 18/5 18/13 64/4 64/5 127/11
conclusion [2] 64/21 118/12
concrete [1] 34/4
concur [1] 49/7
concurrent [1] 122/4
concurrently [1] 122/9
concurring [2] 8/17 9/4
condition [5] 16/23 18/8 124/24 124/25 125/2
conditional [1] 18/7
conditions [7] 37/22 122/12 122/13 122/17 123/4 124/8 126/25
conduct [54] 5/25 6/1 6/4 6/15 6/16 7/15 12/22 21/9 22/6 22/10 22/15 22/16 23/1 23/2 23/10 23/11 23/19 26/10 26/19 27/21 27/25 36/3 36/6 36/14 36/22 36/24 37/1 38/11 38/11 65/11 65/13 73/18 74/15 74/23 76/7 78/7 78/14 78/16 78/17 78/20 79/13 79/15 81/18 82/3 82/10 84/4 86/8 110/6 114/10 117/23 118/17 122/16 124/10 124/25
conducted [3] 87/24 124/16 125/4
confined [2] 112/5 113/7
confirm [5] 4/9 12/13 14/5 14/6 34/17
conflict [7] 99/15 120/7 120/21 120/21 121/4 121/6 121/16
confronted [1] 10/1
confusing [1] 8/14
Congress [12] 7/3 24/18 36/20 61/1 66/14 73/25 75/21 78/21 82/15 106/17 112/22 115/3
congressional [1] 7/5
Congressman [1] 104/17
Congressmen [1] 112/23
connect [1] 47/25
connected [2] 44/21 82/16
connection [8] 22/24 43/21 65/18 72/2 72/3 72/4 91/18 110/13
connotes [1] 35/1
consciousness [2] 66/24 73/7
consequences [3] 66/21 73/11 84/13
consider [8] 5/19 9/6 9/16 11/20 20/16 109/10 109/15 109/23
consideration [5] 59/18 59/22 69/24 81/22 81/24
considered [7] 28/2 34/21 82/19 107/9 110/12 110/22 116/9
considering [2] 22/25 110/22
consistent [2] 50/9 103/9
consistently [2] 9/5 80/24
conspiracies [1] 23/22
conspiracy [70] 15/9 21/13 21/15 22/20 23/12 23/18 23/24 24/6 24/8 24/9 24/22 26/6 26/19 26/21 29/24 31/7 31/15 31/19 31/21 32/25 33/12 35/23 36/8 37/7 42/7 42/13 43/10 46/21 50/8 56/19 56/21 57/2 57/8 57/10 58/21 59/4 59/24 64/4 64/23 65/1 65/17 66/2 67/16 74/5 74/17 74/18 76/10 78/7 82/8 84/1 84/18 84/20 84/21 86/13 86/15 87/21 94/10 94/16 97/20 97/21 104/18 108/2 110/11 110/11 110/18 110/24 111/7 112/5 112/13 113/1
conspirator [1] 5/19
conspiratorial [2] 66/19 112/1
conspirators [15] 23/21 31/24 34/2 38/11 65/13 65/15 66/4 66/11 66/16 67/2 74/1 77/11 85/14 111/11 114/8
conspirators' [2] 86/8 86/11
conspired [3] 26/7 105/1 118/16
constitute [5] 23/17 29/4 29/21 38/12 65/13
constituted [1] 27/6
constitutes [2] 29/3 75/19
constituting [1] 82/17
Constitution [11] 2/17 62/7 85/20 86/23 107/15 108/3 108/4 108/7 112/18 121/18 121/21
constitutional [4]

C

constitutional... [4] 15/16 46/11 87/16 108/9
constitutionally [1] 121/13
construct [1] 6/14
contains [2] 124/17 125/3
contemplate [1] 79/5
contemplated [1] 74/5
contemplating [1] 70/25
contend [1] 47/12
contends [1] 70/7
contention [4] 18/10 18/24 20/20 21/17
contents [2] 67/22 73/10
context [7] 10/6 50/14 54/4 71/17 87/2 106/5 106/24
continue [1] 12/5
continued [8] 2/1 46/6 46/19 59/1 75/21 88/1 88/6 119/9
continues [5] 84/5 87/22 88/20 108/9 119/10
contradicts [1] 46/5
contributed [2] 26/9 76/5
control [21] 8/12 8/22 8/24 9/1 9/6 24/8 29/13 29/14 29/22 33/11 34/4 34/21 34/25 51/19 51/20 77/21 77/23 78/1 95/20 95/23 119/17
controlled [4] 33/25 95/4 122/19 122/20
conveyed [1] 118/20
convicted [17] 35/23 64/3 64/23 65/2 76/10 76/25 80/25 92/13 92/21 94/9 94/11 94/15 110/10 111/6 114/14 114/14 114/17
conviction [8] 38/7 59/24 78/7 78/17 82/13 126/15 126/23 126/24
convictions [1] 11/5
convincing [1] 20/4
cooperate [1] 122/24
cooperating [3] 93/16 93/18 94/3
cooperators [2] 30/5 86/1
coordination [1] 32/13
cops [1] 104/6
copy [1] 14/10
corner [3] 72/13 88/5 100/21
correct [8] 53/4 53/4 55/17 58/21 120/16 120/20 121/13 128/3
correctly [1] 93/14
corroborate [1] 18/21
corroborates [1] 55/4
corroborating [1] 55/25
corrupted [1] 48/17
cost [9] 11/11 27/16 27/19 27/20 27/24 28/1 28/16 126/18 126/20
costs [1] 76/1
coterminous [1] 23/11
could [40] 11/1 17/5 17/21 18/5 20/4 21/7 21/25 23/23 24/15 28/7 29/3 30/1 30/19 39/8 50/18 50/19 50/25 53/12 53/25 57/9 61/9 62/1 62/10 63/5 67/9 69/20 74/3 80/18 89/20 89/22 91/20 93/18 101/7 101/19 102/22 102/23 106/7 106/25 111/25 115/9
couldn't [8] 6/10 67/24 71/23 101/6 101/7 101/7 102/15 114/16
counsel [4] 12/13 14/13 63/11 126/21
counseled [1] 22/17
count [10] 60/25 61/10 62/4 62/5 63/6 67/17 68/7 69/24 82/18 122/10
Count 7 [1] 82/18
count,' [1] 71/3
counted [3] 61/11 63/8 63/9
counting [6] 61/3 61/9 61/12 61/20 62/3 62/12
country [23] 26/25 62/19 81/11 84/19 84/22 85/20 85/25 87/10 96/20 97/24 98/9 98/13 99/11 100/8 103/10 107/6 113/5 113/18 115/11 115/23 117/17 118/1 122/1
counts [6] 82/13 82/14 82/18 114/17 122/5 122/8
Counts 1 [4] 82/14 82/18 122/5 122/8
Counts 3 [1] 82/13
coupe [1] 119/13
couple [8] 3/18 3/20 41/12 42/3 58/21 60/18 60/22 92/12
courage [1] 115/9
course [18] 15/10 16/2 24/5 26/15 41/4 68/1 69/3 73/6 75/6 76/1 76/18 78/25 99/2 100/3 105/4 105/22 118/13 118/17
court [123] 1/1 2/14 2/16 4/23 5/1 5/6 5/8 5/11 5/22 6/13 6/21 6/23 7/11 8/1 9/2 10/1 10/6 10/10 22/13 22/14 24/7 24/13 25/2 25/13 25/19 26/13 27/2 28/2 28/18 29/10 29/23 30/2 31/16 33/13 33/15 33/18 34/2 34/20 34/24 35/18 35/21 37/20 38/6 38/10 40/6 40/7 40/8 40/13 40/14 40/17 40/21 42/12 42/19 42/21 43/16 45/5 45/14 45/16 45/20 48/2 49/7 51/10 52/23 53/14 56/18 59/12 59/13 59/15 59/18 59/18 59/20 59/22 60/2 60/5 60/6 60/10 63/3 63/14 63/17 79/9 81/7 83/24 84/4 84/7 84/11 85/3 85/23 86/24 87/8 87/17 87/20 88/15 88/21 89/6 90/23 91/1 91/8 92/11 93/4 93/14 93/24 95/18 95/19 104/20 107/17 108/25 109/2 111/14 116/2 122/3 122/23 123/2 125/25 125/25 126/2 126/3 126/4 126/6 126/18 126/19 126/21 127/2 127/10
Court's [4] 4/19 32/22 83/16 100/25
court-appointed [1] 126/21
courthouse [1] 25/23
courtroom [1] 116/12
courts [2] 28/7 38/1
cover [2] 60/22 67/1
COVID [1] 107/21
cowering [1] 75/10
CR [2] 1/4 30/16
crazy [2] 90/2 90/3
create [4] 20/7 91/7 92/3 93/25
created [2] 108/8 108/8
creating [1] 76/17
credit [2] 20/17 70/13
crime [5] 38/13 96/20 111/18 112/3 122/18
crimes [3] 112/3 112/22 113/3
criminal [36] 3/3 5/2 5/12 12/21 21/2 21/15 22/20 22/22 22/24 23/5 23/15 24/4 33/21 38/18 57/21 57/22 58/3 58/5 63/23 64/22 65/13 65/16 65/19 82/16 83/13 92/22 93/2 95/9 95/17 111/17 111/20 111/23 111/25 112/15 116/3 123/7
criminal's [1] 108/14
criminality [3] 107/4 108/18 111/22
criminals [1] 84/10
crisis [1] 108/9
critically [2] 65/20 86/19
cross [2] 44/11 45/1
crossing [1] 49/21
crowd [3] 50/4 50/13 50/20
CRR [2] 128/2 128/8
Crystal [2] 2/13 3/10
Crystal Lustig [1] 3/10
culpability [1] 80/6
cum [1] 115/21
current [1] 99/4
currently [1] 121/1
custody [1] 122/4

D

D.C [19] 1/5 1/17 2/17 17/7 20/6 25/1 32/7 68/12 70/6 77/6 88/5 90/14 91/15 97/8 99/21 100/5 118/6 118/11 126/4
D.C. [4] 19/5 32/5 34/20 35/11
D.C. Circuit [2] 34/20 35/11
D.C. Op Jan. 6 [1] 19/5
D.C. Op Jan. 6, '21 [1] 32/5
daily [1] 27/5
Dallas [2] 2/4 2/8
damage [9] 10/4 10/12 10/19 10/22 11/1 11/2 24/20 25/8 83/2
danger [3] 112/1 112/5 119/10
dangerous [6] 93/2 93/5 93/7 93/10 94/10 118/5
daresay [3] 19/12 114/21 117/24
data [2] 107/3 124/17
Date [1] 128/7
Dave [1] 15/25
day [47] 4/4 11/10 23/23 24/17 39/5 42/8 44/9 44/25 51/21 54/18 57/22 60/23 61/8 61/13 61/13 61/13 62/22 65/22 67/9 68/10 70/5 73/4 75/5 76/17 79/2 92/14 92/24 92/25 96/4 97/7 100/6 100/20 101/25 103/16 104/5 104/16 105/7 111/12 113/7 113/8 114/25 115/2 115/10 117/14 117/14 118/23 118/25
days [12] 11/20 11/25 23/8 24/22 88/3 88/14 91/12 115/11 119/3 122/21 126/5 126/17
deal [1] 11/22
dealings [1] 111/19
death [1] 112/17
decade [2] 8/19 87/19
decades [1] 117/16
December [9] 15/17 16/7 17/6 18/1 51/2 56/24 76/14 77/8 100/5
December 12th [1] 77/8
December 29th [1] 17/6
decide [2] 59/19 69/2
decided [1] 51/9
decision [6] 4/19 8/16 46/1 46/2 59/14 77/17
declassification [1] 107/3
decline [1] 80/15
decreases [1] 111/21
deep [1] 95/8
deeply [1] 59/6
defamation [1] 104/23
default [2] 5/7 7/2
defeat [2] 16/11 66/18
defendant [20] 1/7 2/2 3/12 4/15 9/7 9/8 11/14 19/17 22/17 22/21 23/20 33/16 33/19 84/16 86/21 88/4 88/19 109/17 109/21 115/14
Defendant Rhodes [3] 84/16 88/4 88/19
Defendant Rhodes' [1] 86/21
defendant's [7] 13/14 13/15 22/16 23/2 23/3 28/1 126/13
defendants [20] 8/11 11/1 16/21 19/17 23/12 23/14 29/20 31/1 31/5 33/15 35/13 74/15 80/11 84/8 84/12 84/17 93/16 94/15 94/21 110/10
defense [20] 3/9 12/13 12/17 15/2 15/8 20/1 21/2 29/8 37/24 41/1 41/10 42/11 44/23 80/14 81/2 81/25 96/12 110/1 116/3 116/5
defense's [2] 12/8 14/21
defies [2] 68/23 68/23
define [1] 112/22
defined [2] 37/24 112/18
definitely [1] 99/4
definition [4] 22/14 22/25 36/2 74/5
degree [9] 4/2 80/9 81/6 81/12 81/17 81/18 81/23 82/1 82/3
delay [2] 43/15 75/17
delete [3] 20/22 67/4 73/9
deletion [1] 21/6
demanded [1] 87/4
demanding [2] 5/23 6/19
demands [1] 7/6
democracy [9] 79/23 86/20 88/20 114/21 115/4 117/17 118/2 118/25 121/20
Democratic [3] 105/6 105/7 117/21
demonized [1] 106/5

D

demonstrate [1] 81/1
denied [1] 54/21
deny [1] 19/24
depart [3] 33/19 34/5 111/22
departed [1] 82/4
Department [2] 59/2 74/25
departure [9] 37/22 78/5 81/3 81/4 81/9 81/20 82/2 82/4 83/11
depending [4] 5/9 8/3 40/16 40/21
depends [2] 57/3 57/5
DeploraBall [1] 97/4
deplorable [1] 90/1
descending [1] 52/14
described [6] 16/22 31/23 31/24 47/1 81/7 116/23
description [1] 78/8
designates [1] 77/24
designating [1] 32/10
designed [1] 125/6
desires [1] 96/10
desks [1] 124/15
desperately [1] 88/17
despite [3] 80/22 96/10 103/7
destroy [1] 56/10
destroyed [1] 56/2
destroying [1] 96/20
destruction [2] 38/7 38/13
detail [3] 61/5 117/4 119/7
detailed [3] 52/23 72/10 89/11
details [1] 64/17
detain [1] 112/16
detention [2] 42/19 89/9
deter [3] 99/13 99/16 107/11
determinations [1] 22/2
determine [1] 124/16
determined [2] 82/9 122/23
deterred [1] 98/25
deterrence [6] 86/17 87/5 99/6 109/20 115/15 115/15
development [1] 118/24
device [3] 123/22 125/2 125/9
devices [3] 124/15 125/5 125/14
devolve [1] 117/17
dicta [1] 9/4
did [82] 4/6 6/21 9/13 9/13 9/20 10/10 18/24 18/25 19/18 19/22 19/23 20/5 21/10 29/8 29/21 33/16 33/22 37/3 38/5 38/11 39/2 39/4 40/5 40/7 41/7 42/15 44/15 45/19 47/5 48/16 49/18 49/23 49/25 51/20 52/10 52/10 54/15 55/1 56/6 62/20 62/21 62/22 62/23 65/6 67/16 68/7 69/13 69/22 71/20 72/25 81/16 90/7 90/25 91/7 91/9 91/12 91/15 91/21 93/1 95/12 96/4 96/5 96/21 97/7 98/25 99/1 99/1 99/1 99/21 100/10 100/11 101/21 102/13 103/3 103/16 103/25 105/14 105/16 106/1 107/17 111/13 114/6
Did anybody [1] 47/5
did you [1] 41/7
didn't [45] 19/25 47/25 47/25 49/5 49/6 50/5 54/1 54/16 55/3 55/3 55/4 55/5 56/5 56/7 56/9 56/9 56/10 56/10 58/1 67/22 68/14 68/14 68/19 68/20 69/1 71/22 90/1 90/18 90/20 90/21 91/7 92/3 92/23 92/24 98/20 101/1 101/13 101/17 102/18 112/9 113/9 113/14 113/15 114/2 121/12
died [1] 90/3
difference [4] 27/22 98/21 105/11 105/17
different [12] 10/8 10/15 25/22 26/24 28/2 35/14 53/1 57/16 82/5 90/14 105/17 109/24
differentiates [1] 94/18
digital [1] 123/24
diminishes [1] 112/12
direct [6] 18/25 19/18 19/19 44/25 48/1 107/24
directed [8] 24/16 47/8 66/13 69/11 72/2 77/11 110/7 122/25
directing [2] 39/23 62/16
direction [3] 30/23 57/5 86/10
directions [2] 19/11 30/20
directly [6] 19/4 25/9 39/3 39/23 46/5 47/17
director [1] 87/15
directs [1] 25/3
disagree [6] 37/11 37/18 41/23 46/2 48/2 79/3
disagreements [1] 113/23
disaster [1] 95/11
discharged [1] 115/25
disclosed [1] 15/17
Discord [1] 125/12
discourage [1] 81/9
discourse [1] 48/12
discretion [3] 9/13 31/13 60/10
discretionary [1] 122/13
discussed [8] 24/7 33/3 45/17 59/16 69/3 69/4 89/4 89/4
discussing [1] 34/21
discussion [2] 62/24 115/14
discussions [1] 113/24
disenfranchise [1] 105/1
disenfranchising [1] 105/3
disguise [1] 125/7
dishonorably [1] 115/24
disjointed [1] 58/14
disparities [3] 109/23 110/1 110/14
display [1] 115/1
disposal [1] 53/7
dispositive [1] 29/17
dispute [6] 43/6 43/17 46/12 46/21 50/9 116/18
disputed [1] 44/17
disputes [6] 12/16 14/17 15/1 41/6 41/12 52/24
disrupt [3] 54/5 54/13 74/4
distribute [1] 20/13
distributed [1] 20/19
district [9] 1/1 1/1 1/10 40/6 53/20 114/15 125/21 126/4 126/10
divided [1] 107/7
division [1] 108/10
divorced [1] 115/18
divvy [1] 41/11
DNA [1] 122/24
do [82] 6/8 7/25 10/10 14/25 15/2 16/14 17/18 17/19 17/19 18/5 18/14 20/8 23/17 23/19 31/17 39/14 40/2 40/8 40/14 42/6 42/10 43/10 43/13 43/21 44/18 45/5 47/12 47/18 47/20 48/5 48/13 49/4 49/18 50/9 51/9 51/12 51/12 51/19 52/10 52/10 53/13 53/13 53/25 54/6 55/2 56/5 57/13 58/6 60/3 60/4 62/13 63/21 73/14 75/12 78/21 79/9 79/9 80/16 82/23 89/14 89/24 90/6 93/13 93/15 93/21 93/24 93/25 98/12 102/12 102/23 106/6 106/23 106/25 107/3 107/5 113/9 113/19 118/7 119/18 119/18 121/17 126/15
do you [5] 47/12 48/13 49/4 57/13 96/1
docket [1] 13/20
documented [1] 116/14
does [31] 4/9 4/18 5/1 5/1 28/12 29/17 29/18 34/3 35/18 37/17 37/19 41/11 42/9 46/18 50/3 50/7 51/10 51/10 51/11 59/16 66/18 73/22 79/12 79/16 82/3 93/24 93/25 97/17 108/14 118/10 120/23
doesn't [11] 6/11 16/8 21/1 38/7 81/10 93/6 93/24 113/20 113/20 119/6 121/20
doesn't apply [1] 81/10
dog [2] 117/13 117/13
doggedly [1] 85/16
doing [10] 11/13 36/1 40/13 60/1 62/18 79/2 98/19 103/19 107/2 115/5
DOJ [1] 41/11
Dolan [14] 18/15 30/9 43/4 43/24 43/25 44/2 44/2 44/5 45/3 47/9 49/19 50/23 54/21 71/14
Dolan's [7] 17/25 44/13 44/24 45/7 45/13 46/25 69/22
dollar [3] 28/16 28/24 29/2
Don [3] 102/7 102/7 102/8
don't [57] 5/16 9/21 11/8 11/19 13/25 14/19 17/8 19/14 21/19 23/6 28/6 37/12 37/12 38/16 40/21 41/24 42/22 48/2 51/9 52/17 52/21 54/7 55/25 56/2 56/3 57/17 60/17 62/1 67/9 68/3 70/7 71/4 71/6 73/4 73/7 75/20 77/6 77/7 79/4 89/18 89/19 89/21 93/12 95/25 95/25 99/15 99/16 99/19 100/2 102/6 103/24 106/1 110/8 113/18 116/10 116/12 117/3
done [17] 42/20 43/11 47/15 62/10 67/20 67/21 68/19 71/20 95/11 95/12 96/23 103/13 103/14 106/15 106/16 106/17 116/17
door [2] 11/10 74/21
doors [11] 11/3 11/4 11/4 19/10 19/13 43/13 50/1 50/1 50/21 56/9 74/21
doubt [3] 20/4 68/3 69/14
dovetails [1] 51/17
down [9] 14/22 32/24 34/15 84/12 86/9 91/14 96/25 98/18 108/13
download [1] 123/20
downward [1] 81/2
dozen [2] 47/16 57/4
dozens [2] 89/8 118/6
dramatic [1] 47/16
draw [1] 67/9
dressed [1] 97/16
drew [2] 64/9 65/21
drilled [1] 85/16
driving [1] 72/17
drop [1] 108/6
drug [2] 122/21 122/22
due [6] 25/18 26/11 42/11 73/21 75/13 115/25
duly [1] 16/5
dump [1] 107/3
during [4] 46/6 85/21 85/22 100/6
duty [3] 54/9 79/2 101/15

E

each [10] 6/4 6/11 9/7 9/8 23/14 23/20 29/21 50/11 107/23 122/5
earlier [6] 8/19 21/21 55/12 70/1 76/6 77/3
early [1] 42/18
earned [1] 116/1
easier [1] 24/6
east [3] 11/3 19/14 50/20
echoed [1] 25/21
eclipses [1] 81/18
edge [1] 102/16
educated [1] 115/20
education [2] 116/7 116/24
educational [1] 109/22
Edward [2] 2/10 3/9
Edward Tarpley [1] 3/9
Edwards [2] 1/15 3/6
edwardtarpley [1] 2/12
effect [5] 36/23 37/7 47/4 99/5 114/20
effectively [2] 106/1 124/19
effectuate [1] 10/9
effing [1] 72/16
effort [5] 28/8 28/14 28/17 28/21 112/21
efforts [4] 26/17 81/15 85/11 86/7
eight [6] 24/19 25/11 75/13 83/1 83/4 84/16
eight-level [1] 83/1
eight-point [1] 75/13
either [14] 11/25 12/1 14/21 22/5 31/6 34/12 47/17 47/25 63/2 82/1 86/3 94/15 108/15 119/16
elaborate [1] 64/11

E

elderly [2] 97/9 98/11
elected [1] 16/6
election [26] 15/10 15/16 24/23 35/25 37/3 40/1 51/1 53/10 54/15 57/24 60/25 61/2 64/25 84/3 84/23 85/18 87/2 88/6 88/7 90/12 90/15 91/9 107/21 114/3 114/22 119/12
elections [2] 105/2 114/21
electoral [9] 60/25 61/9 61/10 61/21 62/4 62/4 62/12 63/6 63/8
electors [4] 43/15 46/9 58/24 107/25
electronic [1] 67/21
element [3] 8/24 37/9 78/8
elements [1] 112/20
elicited [4] 43/18 44/10 45/16 61/15
Ellipse [1] 101/3
ELMER [3] 1/6 2/2 3/4
Elmer Stewart Rhodes III [1] 3/4
else [13] 11/24 39/23 55/3 62/9 65/9 67/2 67/4 72/3 96/7 100/11 104/1 113/17 127/3
else's [3] 96/4 104/11 104/11
Email [5] 1/18 1/19 2/5 2/9 2/12
embarked [1] 112/2
emblematic [1] 115/7
emergency [2] 16/20 112/21
emit [1] 21/10
emotionally [1] 104/6
emphasizes [1] 116/5
employ [1] 5/8
employee [1] 35/3
employer [1] 35/2
employment [1] 53/17
en [1] 9/2
en banc [1] 9/2
enacted [1] 112/22
encompasses [2] 22/16 23/20
encourage [1] 86/5
encouraged [1] 24/10
encrypt [1] 125/6
end [9] 4/4 11/7 38/22 40/16 40/20 49/23 60/14 61/8 112/2
ended [5] 3/19 8/8 19/14 47/24 57/15
endorsed [1] 5/23
ends [5] 47/21 71/8 74/4 111/24 117/19
enduring [2] 114/19 114/25
enforcement [3] 27/15 28/7 117/9
engage [3] 18/3 59/18 125/25
engaged [5] 23/4 23/14 58/5 60/24 112/9
engagement [1] 117/10
enhancement [31] 3/23 7/18 8/6 8/10 8/21 9/8 29/11 31/11 32/23 34/11 34/11 35/20 38/24 38/25 41/15 55/13 56/17 57/17 57/18 58/8 75/14 75/15 75/23 78/3 78/9 79/8 79/18 79/19 80/5 80/8 83/1
enhancements [2] 3/20 3/22
enough [2] 5/14 70/13
enrolled [1] 115/23
ensure [3] 80/10 86/19 124/8
enter [6] 19/19 24/17 73/16 99/1 120/24 125/25
entered [7] 12/1 19/16 63/1 69/8 76/20 123/3 126/24
entering [1] 98/1
enterprise [1] 112/7
enters [1] 126/18
entire [3] 100/20 106/4 121/8
entry [3] 69/18 73/16 97/17
enumerated [1] 78/10
equipment [3] 20/12 30/18 36/17
equivalent [1] 79/8
equivocal [2] 47/1 71/16
escort [2] 97/5 98/11
escorting [1] 101/3
escorts [2] 97/7 98/9
espousing [1] 15/14
essence [1] 73/24
essential [2] 14/19 86/20
essentially [7] 5/7 11/23 25/19 26/1 26/3 26/7 85/8
establish [4] 5/14 76/7 77/20 122/15
established [2] 20/9 74/2
establishes [1] 79/9
estimates [1] 27/16
et [4] 10/23 123/25 124/15 125/13
et cetera [3] 123/25 124/15 125/13
evaluating [1] 9/7
eve [3] 72/23 120/21 121/3
even [25] 5/18 8/16 21/20 26/18 28/15 28/18 29/3 33/15 34/2 36/9 42/11 44/22 50/25 56/25 59/14 69/10 76/13 80/7 93/7 97/20 99/10 103/25 107/8 107/12 119/8
event [11] 6/1 6/2 6/4 20/14 78/23 90/4 100/18 100/24 101/4 103/3 117/8
events [8] 10/15 39/4 76/13 90/18 90/21 91/21 91/23 99/12
ever [15] 41/20 43/20 44/8 44/8 46/21 50/18 50/19 50/25 51/22 62/11 62/13 63/5 97/19 99/9 121/8
every [5] 13/22 92/20 106/5 107/9 114/22
everybody [4] 3/17 67/3 95/8 96/3
everyone [11] 3/14 11/24 63/12 63/20 67/4 100/9 108/23 109/5 109/7 118/15 118/16
everything [5] 24/1 48/17 64/13 91/9 106/6
everywhere [1] 37/17
evidence [60] 11/5 15/8 15/11 16/15 16/17 17/4 18/12 19/18 20/3 21/24 21/25 29/13 30/2 32/2 38/9 44/15 50/6 52/20 52/22 52/25 53/6 53/8 54/17 54/25 55/25 56/23 56/23 61/19 61/21 62/13 64/11 64/15 64/16 64/19 64/20 65/5 65/20 66/8 66/23 67/19 69/16 69/20 69/21 69/25 71/9 72/19 73/7 73/14 73/20 87/7 89/13 90/14 90/25 91/16 91/19 92/25 95/2 101/20 116/11 125/3
evidentiary [3] 49/5 65/8 65/8
ex [1] 87/14
ex-wife [1] 87/14
exact [4] 19/16 71/18 100/7 105/15
exactly [7] 6/12 6/21 19/14 47/19 71/16 71/24 73/10
example [15] 5/11 6/6 15/13 15/17 27/25 30/20 33/11 33/24 40/12 48/11 48/13 77/21 98/4 106/15 106/22
examples [2] 21/21 87/23
exception [3] 64/11 80/21 102/11
exceptional [1] 81/3
excited [2] 91/23 93/12
excuse [4] 11/3 19/19 78/8 125/5
excuses [2] 86/8 103/24
excusing [1] 95/7
execute [2] 93/6 126/11
execution [1] 65/3
executive [3] 87/15 107/21 119/17
exercise [2] 8/21 95/23
exercised [6] 9/12 24/8 33/12 33/20 33/25 34/6
exercising [1] 35/5
exhaustive [1] 16/15
Exhibit [5] 16/12 16/13 32/3 33/7 87/14
Exhibit 6701 [1] 32/3
Exhibit 6923 [1] 33/7
exhibited [1] 76/19
exhibits [1] 13/23
existed [3] 46/22 106/4 112/24
exists [1] 125/1
expansion [1] 26/15
expect [1] 125/22
expectations [1] 122/15
expend [2] 27/1 27/3
expenditure [3] 27/6 27/14 27/18
expense [1] 28/3
experience [1] 104/14
experienced [4] 4/17 34/1 48/17 104/5
explain [1] 110/8
explained [3] 18/2 18/3 84/7
explanation [2] 68/23 68/23
explicit [1] 45/3
explicitly [3] 24/15 25/3 32/3
exploit [1] 86/11
expose [2] 107/4 108/18
expressed [1] 93/25
expressly [1] 15/17
extensive [10] 29/6 56/17 56/22 57/3 57/6 57/11 76/9 76/12 76/14 83/7
extensively [2] 24/7 29/9
extremely [1] 70/1
extremist [4] 113/21 123/8 123/14 124/2
eyes [2] 48/13 100/2

F

F.3d [2] 27/11 35/10
fabric [1] 118/2
face [5] 88/15 90/7 90/8 90/9 91/25
faced [1] 75/1
facilitates [1] 24/25
fact [34] 4/9 6/4 6/5 6/9 7/23 8/23 9/14 24/13 46/3 47/20 55/5 61/17 63/1 66/17 66/24 67/10 67/22 68/8 68/25 69/17 69/17 70/5 73/15 73/17 73/24 75/17 75/20 75/23 76/5 80/6 80/23 94/6 107/21
factions [1] 18/4
factor [5] 5/13 5/14 9/1 9/7 29/18
factors [8] 5/13 39/20 60/3 60/8 81/9 109/11 109/15 111/4
facts [16] 4/13 10/14 14/16 14/18 26/20 40/2 48/25 56/18 57/23 64/2 64/6 64/9 64/10 78/18 89/12 110/16
factual [22] 5/4 12/16 12/23 14/17 14/23 15/1 20/15 22/1 23/16 26/14 28/5 28/16 28/24 32/19 40/2 41/6 42/5 43/17 46/20 50/9 51/25 80/17
factual-based [1] 42/5
factually [2] 24/2 58/9
failure [1] 27/16
fair [1] 114/16
false [2] 85/18 108/3
families [1] 97/9
far [7] 28/3 37/15 41/23 41/24 80/7 92/7 115/9
Fascism [1] 97/11
fashion [2] 50/5 51/13
fatal [1] 87/3
Fathers [1] 85/19
FBI [1] 26/23
fear [7] 17/9 75/10 90/6 90/6 90/7 93/13 96/2
featured [1] 105/19
February [2] 42/18 104/17
federal [6] 38/13 61/1 62/7 112/15 117/6 122/18
feel [4] 41/24 104/14 104/15 107/12
feeling [1] 31/24
feels [1] 39/21
fellow [1] 66/4
felony [1] 38/12
few [4] 21/8 92/8 92/10 108/22
fiction [1] 6/14
field [1] 26/24
Fifth [1] 44/22
fight [6] 16/10 18/2 36/10 94/23 99/15 118/13
fighters [1] 117/13
fighting [2] 102/17 103/8
fightings [1] 18/4
figure [3] 28/24 28/25 118/4
file [3] 32/9 126/17 126/20
filed [2] 104/18 104/19
filing [1] 50/22
final [4] 9/10 11/20 13/5 84/24
finally [3] 21/17 22/25

F

finally... [1] 101/21
financial [6] 4/16 4/16 125/17 125/18 126/2 126/6
find [25] 20/4 20/5 20/25 21/3 26/8 26/14 34/4 35/15 35/22 38/10 59/6 63/23 65/4 65/5 65/12 67/16 70/10 73/14 75/13 75/20 87/17 101/12 104/13 110/8 121/23
finding [9] 42/5 46/5 60/9 64/10 64/14 65/7 73/19 119/17 120/18
findings [6] 24/13 24/14 41/9 42/12 42/22 68/2
finds [1] 33/16
fine [1] 83/15
firearms [6] 18/20 20/5 30/21 33/25 84/22 117/5
firecrackers [1] 99/17
first [19] 3/23 15/7 16/4 19/2 25/3 40/1 44/7 44/8 56/6 63/22 69/25 70/15 78/16 87/8 95/3 95/5 96/21 100/12 105/10
First Amendment [1] 96/21
fit [2] 35/13 96/3
fits [2] 36/22 110/24
five [1] 50/3
five-year-old [1] 50/3
fix [2] 107/6 119/21
fixed [1] 17/22
flagpole [1] 103/12
floor [1] 79/10
focal [1] 99/6
focus [4] 59/25 60/1 85/13 107/15
focused [2] 105/10 106/25
folks [2] 70/11 98/4
follow [7] 7/11 23/8 26/16 28/13 52/7 55/7 67/8
follow-through [1] 55/7
followed [4] 26/17 54/8 66/22 85/6
followers [3] 85/3 85/15 85/17
following [9] 14/15 30/7 64/24 68/4 84/3 86/12 111/9 122/12 123/4
follows [1] 82/7
foment [1] 114/5
fools [2] 108/13 108/14
foot [1] 31/20
force [34] 6/7 16/19 16/19 17/1 18/6 18/13 18/19 18/22 24/23 24/25 25/1 33/6 35/25 36/1 36/6 36/7 64/24 65/2 66/12 69/3 69/9 69/10 74/6 78/22 78/25 79/1 84/1 84/18 86/25 88/2 99/13 113/4 113/10
foregoing [1] 128/3
foreign [1] 110/20
foreseeability [1] 5/5
foreseeable [10] 22/24 23/17 24/3 65/18 68/5 69/6 69/7 69/12 73/18 74/17
foreseen [2] 23/23 68/8
forget [2] 39/11 115/12
form [1] 23/15
formal [1] 35/4
formally [1] 55/19
formed [3] 57/9 57/10 112/4
former [5] 21/12 61/4 86/3 102/3 113/19
forth [4] 7/8 109/11 109/14 109/25
fortunately [1] 121/8
forward [10] 9/6 13/7 29/20 41/9 42/14 54/16 55/9 72/23 76/14 110/2
found [17] 15/11 21/23 24/15 25/2 26/1 26/3 26/5 42/13 42/24 78/18 79/25 83/24 84/4 85/5 105/15 114/17 120/20
founded [2] 105/6 116/3
founder [3] 29/24 77/5 116/21
Founders [1] 120/19
Founders' [2] 119/20 121/15
founding [3] 85/19 116/8 116/25
four [12] 8/10 34/12 57/18 77/2 77/20 78/3 81/13 83/9 86/1 88/3 88/14 94/2
four-level [2] 57/18 78/3
foursquare [1] 78/8
frankly [5] 4/13 38/4 104/13 113/7 118/4
fraud [2] 85/18 108/3
free [7] 48/8 48/12 48/14 48/17 96/21 96/25 100/12
freedom [1] 88/5
freelancing [1] 47/13
Freenet [1] 125/8
friendship [1] 53/16
frozen [1] 99/25
fucking [3] 17/22 45/6 45/23
fulfill [1] 60/7
fulfilled [1] 42/7
full [7] 23/24 38/6 47/18 49/17 49/18 50/14 126/7
functioning [1] 24/12
further [9] 25/13 32/24 55/22 61/17 66/8 66/15 71/9 122/7 124/4
furtherance [5] 21/13 21/15 22/23 65/17 74/18
furthermore [1] 62/11
future [2] 86/17 120/25

G

GA [1] 16/8
GA OK General [1] 16/8
gain [1] 75/2
game [1] 39/13
gaming [1] 125/9
garb [2] 100/6 100/7
gathering [1] 76/15
gave [5] 9/15 20/11 55/13 67/13 86/9
gear [1] 25/6
general [7] 15/7 16/8 16/18 33/2 62/15 86/17 115/15
generates [1] 112/5
George [1] 4/7
Georgetown [1] 87/16
get [23] 9/20 9/21 11/14 11/25 12/2 23/6 30/25 38/19 45/25 46/18 54/9 70/19 70/21 71/22 79/12 79/12 93/10 94/9 101/8 101/13 101/18 103/4 113/15
gets [3] 12/1 86/25 93/12
getting [4] 17/7 31/13 59/7 102/24
ginned [1] 96/6
Giuliani [1] 104/19
give [14] 4/4 12/10 17/8 52/12 55/5 85/24 91/8 93/20 94/1 95/19 95/21 96/15 99/23 108/22
given [12] 6/22 8/1 9/16 19/24 46/7 48/8 49/11 54/21 55/6 70/10 100/17 117/7
gives [1] 40/13
giving [7] 21/6 29/19 30/20 34/19 70/4 70/13 93/21
gmail.com [1] 2/9
go [39] 6/10 12/12 12/18 14/20 25/4 43/10 46/8 49/15 49/16 49/21 49/25 50/1 50/5 50/6 51/9 51/20 52/16 52/17 53/13 53/21 53/22 54/4 54/5 54/10 54/15 54/17 55/3 62/22 69/1 70/25 72/25 73/1 86/9 90/12 92/24 93/1 97/5 100/10 112/9
goal [2] 87/5 108/17
goals [6] 23/3 33/3 85/4 86/13 87/6 117/19
goes [9] 6/13 40/17 55/8 55/23 56/17 58/9 71/9 92/19 93/7
goggles [1] 100/1
going [67] 9/6 9/21 11/14 11/15 12/11 17/18 17/19 17/20 18/7 29/20 37/10 41/5 42/8 43/3 43/21 43/22 49/15 51/1 51/3 51/23 53/21 53/22 55/8 58/6 58/7 60/7 60/17 63/22 64/7 64/18 67/8 71/2 72/23 73/5 76/11 76/19 80/7 88/8 88/11 88/12 88/13 88/13 97/12 97/21 99/18 100/24 101/2 101/2 101/11 101/11 102/6 102/16 102/17 106/10 106/19 107/11 107/11 107/12 107/14 108/6 108/10 109/24 117/10 117/12 117/13 119/16 119/23
gone [8] 47/3 68/6 68/6 69/14 72/11 80/22 91/11 101/23
good [14] 3/2 3/14 14/23 43/20 52/3 52/5 52/6 89/12 102/11 106/15 106/22 118/25 119/1 127/8
Good morning [1] 52/3
Gosh [1] 48/18
got [26] 17/15 44/10 44/11 50/23 54/22 54/23 54/23 54/23 55/11 57/12 57/21 72/17 91/3 91/4 91/4 91/5 91/23 92/20 95/9 95/20 95/22 96/6 102/7 103/5 104/6 106/11
gotten [2] 92/9 96/1
governed [1] 61/1
governing [1] 65/3
government [71] 1/14 3/7 6/24 8/10 8/16 10/21 13/23 14/3 18/3 18/3 20/7 22/9 25/14 26/15 26/25 27/3 27/7 27/19 27/24 28/7 31/14 33/6 36/4 36/9 36/19 36/24 37/1 43/18 45/18 49/1 49/11 49/18 51/11 53/14 53/15 53/19 55/24 56/20 57/14 60/6 62/16 65/2 74/7 78/14 78/15 78/21 80/3 82/15 83/18 83/20 84/2 86/16 87/3 87/19 88/1 88/21 90/5 93/14 93/15 107/4 107/12 112/15 113/4 113/11 117/2 117/6 118/9 120/4 120/8 121/11 121/17
government's [30] 4/6 12/6 13/7 13/13 16/12 16/13 17/11 17/13 23/9 23/13 24/1 27/15 32/2 34/9 36/21 38/15 43/11 43/25 44/10 46/6 54/3 54/7 57/7 58/17 59/11 61/23 78/4 87/13 87/14 92/6
government: [1] 116/24
government: his [1] 116/24
Governor [1] 91/12
grad [1] 73/12
graduate [1] 21/1
Graduated [1] 115/20
granted [1] 53/11
grasp [2] 14/23 89/12
grass [1] 49/21
Graydon [1] 46/14
Graydon Young [1] 46/14
great [5] 37/13 61/5 84/9 88/17 93/16
greater [3] 9/15 109/13 111/18
green [1] 70/12
Greene [23] 32/11 32/15 32/17 44/22 45/8 45/9 45/11 45/12 45/21 52/10 52/13 53/17 54/12 54/22 77/24 101/7 101/15 101/22 101/24 102/2 102/6 102/7 102/21
Greene's [5] 19/18 19/21 67/23 72/9 72/12
Greg [1] 15/20
Greg Smith [1] 15/20
grievance [1] 119/14
grievances [1] 119/10
grossly [2] 107/10 119/12
ground [2] 73/17 99/18
group [23] 7/15 25/3 25/3 25/4 31/2 31/3 39/2 49/25 54/9 54/13 76/4 77/13 81/19 82/14 82/20 86/25 97/3 111/23 112/1 112/4 114/1 123/8 123/14
groups [7] 76/17 76/20 82/18 99/8 99/14 105/23 124/3
growing [1] 115/17
guard [1] 93/8
guess [1] 67/19
guided [1] 31/6
Guideline [9] 7/13 34/10 37/25 78/11 79/15 79/16 82/12 82/13 82/23
Guidelines [27] 7/19 7/21 7/22 8/24 12/24 13/2 22/7 22/11 23/2 29/14 34/14 37/20 40/16 40/17 40/19

G

Guidelines... [12] 63/25 73/21 79/4 79/7 81/22 81/24 82/6 83/14 83/16 83/24 109/8 109/10
Guidelines Range [1] 83/24
guiding [1] 97/3
guilt [4] 66/24 73/7 80/17 104/16
guilty [3] 67/16 85/5 105/15
gun [2] 20/1 103/12
guns [8] 30/21 31/9 52/18 53/20 53/23 54/10 55/4 98/4
gut [1] 28/5
guy [12] 52/13 52/14 53/16 53/18 54/11 55/6 73/13 92/18 113/15 113/15 113/22 114/11
guys [7] 93/21 94/2 99/20 99/23 100/19 102/19 102/23

H

Hackett [2] 30/13 118/11
had [87] 3/19 3/24 4/2 5/11 14/7 14/9 14/10 17/2 19/8 25/13 26/25 27/3 32/7 34/14 34/14 41/6 41/7 41/13 42/18 42/24 42/25 43/1 43/20 45/4 45/15 45/17 48/22 51/20 52/23 52/24 53/6 53/9 53/24 53/25 55/6 57/3 60/14 61/4 66/5 66/11 67/17 67/19 67/20 68/9 68/25 69/2 69/9 70/18 71/20 72/10 72/11 73/3 73/4 74/1 75/18 76/3 85/2 91/8 91/11 91/14 91/19 92/7 92/13 92/22 93/2 95/6 95/16 95/17 96/23 97/11 99/4 100/14 100/17 101/23 102/21 103/17 103/23 106/3 107/20 112/15 114/20 118/23 119/5 119/13 119/20 119/21 121/7
hadn't [1] 69/10
half [7] 21/11 38/24 44/25 47/16 89/5 89/7 89/17
hallmarks [1] 87/5
hallway [3] 74/25 103/18 103/18
halted [1] 63/5
hand [2] 17/10 18/11
handful [1] 81/9
hands [2] 50/12 119/18
hang [1] 17/22
happen [1] 62/20
happened [15] 20/17 24/1 43/23 48/20 54/7 54/15 63/4 67/25 72/24 73/4 89/25 91/9 91/15 95/7 118/23
happening [1] 102/14
happens [1] 118/13
happy [2] 22/5 41/23
hard [7] 14/10 21/3 28/22 36/1 39/11 70/10 70/13
hardship [1] 4/16
hardworking [1] 84/10
harm [7] 6/11 10/4 23/3 24/20 39/24 74/10 75/9
harmed [2] 25/8 112/10
Harrelson [5] 30/11 43/4 44/7 49/19 75/7
has [66] 7/3 8/1 8/10 8/25 9/5 9/24 10/3 10/21 12/14 13/23 14/6 15/2 17/14 18/24 19/17 24/13 25/2 25/19 25/21 28/19 29/8 31/17 34/20 42/5 42/13 42/16 50/2 51/6 52/9 60/6 60/16 80/14 80/24 81/2 81/7 82/8 83/24 84/4 84/7 84/8 84/11 85/5 86/17 87/18 89/6 90/10 91/19 92/23 95/12 101/20 104/14 105/8 105/8 105/9 106/15 106/16 106/17 110/1 112/2 114/20 115/18 117/22 119/24 119/24 120/9 121/21
hasn't [3] 40/10 40/12 81/25
hates [1] 105/24
have [181]
haven't [1] 55/19
having [14] 33/5 44/7 44/24 44/24 45/6 45/7 45/12 45/13 47/3 47/17 48/11 51/2 53/16 80/22
Hawa [1] 28/19
he [198]
he didn't [1] 54/1
he said [5] 20/16 47/6 68/16 72/21 88/11
he'd [1] 53/18
he'll [1] 90/6
he's [16] 17/19 17/20 37/12 37/12 50/18 50/19 54/11 73/2 73/13 74/14 80/25 80/25 95/9 95/11 96/5 115/20
head [5] 31/19 47/21 92/16 94/8 98/7
headed [1] 102/25
hear [10] 12/19 22/5 29/10 36/10 40/25 44/25 45/1 58/25 104/10 107/17
heard [23] 13/2 22/7 30/4 43/20 44/21 45/7 45/7 45/12 45/13 45/22 46/1 47/2 52/20 52/20 52/23 56/23 71/22 72/3 76/2 86/3 116/10 120/2
hearing [10] 3/19 15/12 42/19 45/2 46/25 58/16 83/17 84/13 90/2 121/22
hearings [4] 23/7 35/17 84/8 84/14
heart [1] 104/4
heart-rending [1] 104/4
hell [2] 48/19 68/13
helmets [1] 99/24
help [2] 107/11 108/15
helped [3] 31/8 116/16 116/17
her [5] 75/9 103/17 103/19 103/19 117/23
here [47] 3/16 5/16 6/13 8/1 23/25 27/22 29/2 29/13 29/21 29/22 30/22 30/24 35/6 37/12 38/9 38/23 40/8 40/13 44/24 44/24 44/25 45/1 48/21 54/9 55/1 64/7 67/14 68/2 77/9 77/19 80/20 81/10 81/14 82/3 85/13 86/17 87/4 89/2 90/1 91/14 93/23 107/3 114/10 114/13 120/1 125/23 126/4
here's [2] 69/25 111/14
hereby [1] 122/3
heroism [2] 115/1 115/8
Hey [3] 53/13 53/21 54/9
hierarchical [10] 29/21 35/2 35/3 47/14 51/13 70/2 70/2 70/17 77/22 78/1
hierarchically [1] 34/22
hierarchy [9] 29/16 30/6 30/24 32/4 32/20 35/12 51/15 51/18 65/10
high [1] 11/7
higher [1] 93/11
highest [1] 80/6
Hill [3] 13/19 51/16 115/2
him [37] 14/10 14/12 17/16 18/1 20/18 20/19 21/7 33/3 44/14 45/15 45/16 45/17 49/14 53/13 54/6 65/4 65/14 66/1 67/7 69/7 69/7 70/8 71/22 91/13 95/19 95/20 95/21 95/23 96/3 101/6 101/7 101/8 102/22 102/22 103/23 104/1 104/23
himself [3] 17/20 32/20 73/9
hired [1] 104/24
his [87] 9/4 15/18 17/2 19/24 20/6 20/15 20/17 20/21 21/9 21/14 30/13 33/5 35/3 38/11 39/15 44/3 44/6 44/22 45/3 46/11 47/6 49/11 53/7 56/25 57/5 58/1 61/7 62/11 62/16 63/2 65/11 65/15 66/11 66/15 66/25 67/1 67/1 68/14 69/13 71/18 72/4 73/5 74/15 76/4 77/11 77/13 78/19 81/11 84/16 85/3 85/11 85/12 85/12 85/14 85/17 85/19 86/8 86/13 86/22 87/14 88/4 88/19 91/22 91/23 94/5 94/5 94/6 94/24 95/7 95/10 96/3 96/15 98/6 103/21 103/22 110/25 111/11 112/11 116/6 116/7 116/7 116/24 116/24 116/24 116/25
historic [2] 39/25 88/19
historical [1] 87/11
histories [1] 92/22
history [11] 38/19 40/2 83/13 84/9 93/2 95/9 95/17 109/16 115/11 115/13 117/3
hit [2] 98/6 103/12
hitch [1] 99/23
hold [1] 114/22
home [1] 72/17
honest [3] 44/2 49/12 61/25
Honor [32] 3/2 13/25 14/2 22/8 33/13 41/3 41/18 42/3 42/22 44/5 51/25 52/3 58/13 60/13 60/19 60/21 61/14 62/14 62/25 63/3 63/10 83/19 85/10 88/16 89/1 95/2 95/24 96/8 96/10 106/12 108/8 127/6
HONORABLE [3] 1/9 63/18 109/2
Honorable Amit P. Mehta [1] 63/18
hope [5] 106/21 121/7 121/9 121/16 121/16
hotel [7] 31/5 31/9 31/21 33/4 33/5 51/22 76/16
hours [2] 28/23 67/3
House [5] 16/10 60/23 61/5 61/16 74/10
how [40] 8/1 8/2 10/2 12/10 14/19 17/8 21/5 24/7 24/8 28/6 28/22 28/23 29/16 30/10 32/4 36/10 39/9 40/16 41/18 48/13 49/4 49/6 49/23 52/3 52/5 56/18 56/18 57/5 60/17 79/11 84/25 85/4 85/23 86/4 96/3 102/8 110/24 113/8 119/18
Howell [1] 25/25
however [17] 4/18 5/6 5/22 10/10 10/15 64/8 81/4 81/11 82/9 89/6 90/5 90/18 93/20 108/16 110/12 116/19 125/21
Hughes [2] 1/15 3/6
human [1] 89/16
hundreds [8] 53/25 57/4 68/21 85/2 85/6 97/16 99/11 99/11
hung [1] 119/5
hurricanes [1] 116/16
hurry [1] 50/5
hurt [2] 90/3 99/18
hypothetical [2] 52/12 91/8

I

I also [4] 65/4 65/5 102/10 103/3
I am [5] 8/15 64/10 64/20 64/21 81/14
I apologize [2] 45/10 58/14
I assume [1] 11/22
I believe [9] 29/16 42/22 55/14 58/25 60/14 72/7 81/12 89/12 107/6
I can [3] 20/16 40/20 69/16
I cannot [1] 108/7
I couldn't [3] 71/23 101/7 102/15
I did [8] 4/6 9/13 9/13 9/20 42/15 45/19 100/10 102/13
I didn't [3] 71/22 90/1 101/17
I don't [21] 5/16 9/21 11/8 19/14 48/2 55/25 62/1 67/9 70/7 71/4 71/6 73/4 73/7 89/19 89/21 93/12 95/25 103/24 116/10 116/12 117/3
I have [13] 4/5 13/10 40/15 40/17 49/11 49/13 51/10 102/5 107/9 110/12 110/17 117/24 117/25
I hope [4] 106/21 121/7 121/9 121/16
I just [6] 34/16 51/24 56/14 75/6 94/8 103/6
I know [6] 41/18 45/4 52/23 61/23 82/21 90/24
I mean [6] 27/23 29/5 67/19 72/14 91/16 121/3
I presume [1] 3/17
I say [3] 68/4 79/15 106/20
I should [3] 16/16 89/3

I

I should... [1] 104/22
I think [81] 4/18 6/12 7/9 8/13 8/14 9/18 11/15 14/14 17/4 19/2 20/2 22/9 23/8 25/24 27/8 27/10 28/15 28/18 28/25 29/5 29/13 29/14 30/25 31/16 33/22 34/2 35/5 35/14 35/19 36/6 37/2 37/5 37/6 37/8 38/4 39/6 40/12 40/15 40/16 41/10 46/3 47/4 48/4 51/17 51/21 53/6 54/19 55/9 55/11 58/7 59/8 59/14 61/14 61/15 64/19 67/14 69/20 69/22 69/23 71/3 71/22 72/1 72/4 72/17 78/6 79/11 79/12 80/4 80/7 80/11 82/2 82/23 89/25 93/14 93/16 93/17 95/10 96/11 96/14 111/3 117/14
I understand [1] 10/21
I want [4] 52/7 55/9 95/8 108/16
I wanted [2] 101/12 102/22
I was [6] 72/17 100/21 100/22 101/9 101/18 117/7
I will [12] 8/4 9/6 12/19 13/1 13/1 20/10 46/1 64/11 96/18 110/8 125/20 125/21
I'd [6] 3/21 17/22 42/3 58/21 85/13 92/4
I'll [14] 12/12 12/13 15/5 19/20 19/21 38/21 40/25 51/9 52/12 55/8 63/12 92/10 108/23 110/8
I'm [43] 4/13 4/17 4/20 9/4 9/21 11/16 11/17 22/5 25/13 34/10 41/23 50/7 55/9 55/11 58/6 63/22 64/7 64/13 64/18 65/7 65/9 68/1 68/17 70/13 72/8 73/19 74/23 78/12 82/21 93/22 96/19 101/25 104/3 104/15 104/21 106/9 107/14 107/15 108/6 109/24 119/23 120/11 121/22
I'm going [2] 63/22 119/23
I'm just [2] 11/17 64/18
I'm not [6] 50/7 68/1 70/13 72/8 107/15 108/6
I'm not sure [3] 4/13 4/17 25/13
I'm sorry [2] 4/20 78/12
I've [20] 12/12 13/2 13/17 13/19 13/21 13/22 15/22 16/22 20/10 41/22 41/24 55/11 82/4 96/1 104/6 110/7 110/22 116/10 116/11 116/23
I2P [1] 125/8
idea [4] 51/10 54/7 86/22 89/14
identical [1] 49/3
identify [2] 8/24 10/18
ideological [1] 124/4
ignore [1] 108/7
II [2] 107/15 107/23
III [3] 1/6 2/2 3/4
illegally [4] 17/21 53/10 53/19 53/22
illegitimate [1] 107/13
illustrative [1] 16/14
imagery [1] 65/21
immediate [4] 32/17 74/9 75/8 112/6
immediately [5] 30/12 44/14 123/15 124/6 126/3
impartial [1] 114/16
impeded [1] 63/5
implausible [1] 42/25
implicate [1] 21/7
implicit [2] 34/25 46/16
implicitly [2] 24/15 25/2
imploring [1] 53/11
important [7] 10/16 14/25 64/1 68/3 79/24 87/6 120/5
importantly [2] 65/18 66/23
impose [3] 86/25 88/22 109/12
imposed [6] 109/18 111/1 112/19 122/15 126/16 126/25
imposing [1] 117/20
impossibility [1] 63/4
impossible [1] 26/3
improprieties [1] 15/16
inaccurate [1] 19/3
inadvertently [2] 123/13 124/5
inaugurated [1] 97/13
inauguration [3] 97/2 97/5 97/18
incarcerated [1] 119/8
incarceration [3] 83/21 83/22 86/16
incidentally [1] 25/22
incidents [1] 99/22
incite [1] 21/10
inclination [1] 48/16
inclinations [2] 86/5 86/12
inclined [1] 86/9
include [4] 15/22 17/1 67/23 122/17
included [2] 94/6 100/10
includes [8] 5/3 8/17 23/2 123/8 123/23 124/2 124/14 124/16
including [10] 5/5 18/19 66/5 66/13 73/25 97/24 98/20 113/11 125/9 126/25
inconsistent [1] 15/10
incorporated [1] 78/19
incorporating [1] 64/13
increase [3] 38/18 40/3 79/6
increases [1] 111/19
incredible [1] 67/20
incredibly [4] 31/6 39/10 104/22 107/6
independent [1] 46/3
independently [2] 45/21 49/10
indicate [1] 59/23
indicated [2] 52/8 62/16
indicating [1] 61/20
indicted [2] 16/4 57/14
indictment [3] 44/23 56/20 67/7
individual [7] 6/9 10/2 35/16 111/19 113/3 123/8 123/15
individually [1] 6/3
individuals [6] 26/20 35/22 44/19 74/6 111/21 124/3
induced [1] 22/17
infamous [1] 57/1
inference [1] 67/10
inferences [2] 64/9 64/15
influence [3] 36/23 37/7 78/13
influenced [1] 85/1
inform [1] 32/22
information [3] 77/19 125/17 125/18
informed [1] 45/22
inherently [1] 28/13
initial [1] 124/11
initially [1] 34/14
initiative [1] 15/22
injuries [3] 74/13 74/19 74/19
injury [6] 10/19 74/7 74/14 83/2 104/1 115/25
inside [6] 50/21 71/19 72/5 75/10 100/11 101/23
inspire [1] 65/22
inspiring [1] 84/20
install [1] 124/13
installation [3] 124/18 124/20 124/21
instance [1] 27/12
instances [1] 116/16
instant [1] 123/24
instead [1] 59/25
instigated [1] 24/9
instigators [1] 86/18
Institute [1] 87/16
institution [1] 79/23
institutions [1] 87/25
instruct [1] 100/11
instructing [1] 19/5
instruction [1] 20/13
instructions [1] 30/18
Insurrection [10] 15/22 16/9 16/21 16/22 17/3 18/9 53/12 57/25 66/11 107/1
Insurrection Act [5] 15/22 16/9 16/22 17/3 53/12
Insurrection Act's [1] 18/9
intend [1] 41/7
intended [4] 36/3 38/12 42/1 43/12
intent [4] 7/5 15/18 18/13 26/5
intention [2] 21/22 118/20
intentions [1] 41/17
interact [2] 123/6 123/14
intercede [1] 37/4
intercept [1] 101/10
interesting [2] 4/8 48/24
interfere [2] 46/8 65/3
interference [10] 3/24 25/18 26/11 29/4 55/16 56/11 75/16 75/20 76/8 83/5
interpret [1] 49/4
interpretation [1] 38/3
interpreted [1] 4/12
interrupt [1] 106/7
interview [1] 119/11
interviews [1] 87/24
intimidate [3] 36/18 78/11 84/1
intimidation [6] 36/4 36/24 37/8 78/14 78/22 79/17
introduced [6] 32/2 33/6 61/19 61/22 62/13 72/22
investigate [1] 27/2
Investigation [6] 12/14 12/18 13/11 14/8 15/5 126/9
investigative [2] 26/16 28/14
investigatory [1] 28/8
invocation [4] 16/21 16/22 18/8 18/9
invoke [3] 53/12 57/25 107/1
invoked [2] 17/3 66/10
involved [7] 38/12 80/9 110/5 110/19 111/22 117/5 123/9
involvement [1] 27/13
involves [3] 9/25 82/14 113/7
involving [1] 10/17
irony [1] 118/15
is [389]
issue [17] 8/8 9/10 9/20 9/22 23/6 29/10 34/21 35/19 42/15 44/17 46/20 48/4 50/6 59/9 60/7 71/7 107/16
issued [2] 110/3 123/2
issues [8] 3/20 9/18 12/4 12/20 24/9 33/14 41/12 64/1
it [266]
it would be [5] 7/3 17/2 89/14 89/18 118/22
it's [66] 4/8 5/17 9/14 9/24 10/6 10/22 11/25 14/25 19/15 21/20 23/8 23/22 23/25 24/5 25/10 26/7 34/5 35/10 38/15 39/22 40/6 46/19 47/24 48/8 49/4 50/8 51/3 52/19 56/24 58/9 59/18 68/12 69/1 71/9 74/22 77/4 77/4 79/14 82/8 82/23 88/9 88/11 88/11 88/13 90/4 90/22 96/11 99/17 105/4 105/18 105/18 106/9 106/17 106/18 106/19 107/10 107/11 107/11 108/1 108/2 108/3 113/6 113/9 116/8 117/16 117/21
itinerant [1] 115/17
its [17] 4/24 5/19 13/24 29/3 37/25 52/23 54/3 56/20 59/21 60/10 79/23 80/3 86/24 95/1 107/22 124/19 124/21
itself [9] 7/2 7/15 7/16 34/10 42/6 66/13 74/18 79/16 108/4

J

J.D [1] 116/1
J6 [16] 56/24 56/25 90/8 90/8 90/9 90/17 90/21 91/5 91/12 91/15 91/21 91/23 91/25 100/9 102/13 103/10
J6er [1] 107/9
J6ers [1] 107/8
Jackson [2] 75/3 87/12
jail [2] 87/24 88/5
James [9] 2/7 3/8 20/12 20/12 20/15 32/13 77/13 77/25 103/21
James Lee Bright [1] 3/8
James' [1] 103/1
James's [1] 75/4
Jan. [3] 19/5 32/5 51/4
Jan. 6th [1] 51/4
January [48] 10/14 10/15 17/12 18/19 20/19 21/5 24/12 26/22 28/9 28/22 36/12 36/19

J

January... [36] 39/12 39/12 42/17 42/18 49/7 60/23 62/5 66/9 66/13 68/9 70/6 71/13 72/23 76/13 77/9 77/25 80/24 81/19 84/8 84/10 84/25 87/8 88/18 89/25 90/15 91/13 99/22 100/14 110/3 114/20 114/23 118/23 119/3 119/14 120/14 120/18
January 10th [2] 17/12 39/12
January 2021 [1] 120/18
January 6 [2] 77/25 84/25
January 6th [38] 10/14 10/15 18/19 20/19 21/5 24/12 26/22 28/9 28/22 36/12 36/19 39/12 60/23 66/9 66/13 68/9 70/6 71/13 72/23 76/13 77/9 80/24 81/19 84/8 84/10 87/8 88/18 89/25 90/15 91/13 99/22 110/3 114/20 114/23 118/23 119/3 119/14 120/14
jarring [1] 36/9
Jason [4] 43/24 50/23 119/2 119/3
Jason Alpers [1] 119/3
Jason Dolan [2] 43/24 50/23
Jeffrey [2] 1/14 3/5
Jeffrey Nestler [1] 3/5
jeffrey.nestler [1] 1/20
Jericho [4] 77/8 90/16 91/4 91/11
Jericho March [3] 77/8 90/16 91/4
Jericho Rally [1] 91/11
Jessica [3] 30/17 30/19 103/17
Jessica Watkins [2] 30/17 103/17
Jessica Watkins' [1] 30/19
jlbrightlaw [1] 2/9
job [3] 67/14 116/19 116/20
Joe [1] 114/12
Joe Biden [1] 114/12
John [1] 17/1
John Zimmerman [1] 17/1
Johnson [1] 8/25
Johnston [1] 2/11
join [1] 68/20
joined [4] 23/23 26/4 68/21 107/19
joiners [1] 23/25
joining [2] 43/3 94/22
joint [1] 12/20
jointly [9] 12/21 22/20 22/22 23/4 23/14 24/4 63/23 64/21 65/16
Joseph [2] 30/13 118/11
Joseph Hackett [2] 30/13 118/11
Josh [4] 20/12 32/13 103/1 103/21
Josh James [3] 20/12 32/13 103/21
Josh James' [1] 103/1
Jr [2] 2/10 3/9
judge [8] 1/10 8/18 9/3 25/25 27/11 29/1 58/9 80/5
Judge Posner [2] 27/11 29/1
Judge Randolph [1] 8/18
Judge Randolph's [1] 9/3
judges [2] 25/23 107/22
judgment [6] 12/1 116/19 116/21 122/2 123/2 126/18
judicial [1] 112/19
jurisdiction [2] 107/18 125/22
juror [1] 69/21
jurors [2] 48/16 114/15
jury [22] 15/11 17/4 18/5 18/13 20/4 21/23 21/25 24/15 26/5 42/12 46/1 46/1 46/2 49/14 51/11 64/4 65/6 67/15 67/16 79/25 89/8 114/18
jury's [1] 69/24
just [86] 3/18 11/12 11/17 11/17 12/10 13/9 15/2 15/5 15/13 15/21 16/13 17/20 19/21 20/25 21/8 22/25 23/7 25/24 28/5 28/21 29/19 33/2 33/13 34/16 34/19 36/14 37/19 40/4 41/17 49/21 50/6 51/8 51/24 55/22 56/14 58/1 58/9 59/5 60/18 60/22 61/17 62/14 63/3 63/21 64/18 68/15 69/1 74/22 75/6 76/4 77/4 77/4 83/24 84/4 88/3 90/22 91/9 91/11 91/15 92/2 92/10 94/8 95/25 96/7 96/18 98/17 98/23 99/18 100/4 100/9 100/14 100/25 103/6 105/12 107/7 109/8 109/19 110/1 111/3 113/19 116/23 117/8 119/6 119/12 120/14 121/25
justice [10] 25/18 26/12 55/16 56/12 59/3 73/22 75/16 76/8 83/3 83/6
justifications [1] 40/20

K

Kafka's [1] 104/15
Kamala [2] 15/23 16/3
Kathryn [2] 1/14 3/5
Kathryn Rakoczy [1] 3/5
kathryn.rakoczy [1] 1/19
keep [9] 15/14 16/9 32/16 40/11 55/8 66/6 68/15 88/8 102/23
Keeper [8] 32/15 99/9 103/7 103/8 103/9 103/10 103/13 103/16
Keepers [56] 5/18 10/25 21/7 29/25 39/15 49/22 51/24 53/7 53/8 54/1 54/18 56/1 56/6 56/8 56/12 56/14 57/20 58/5 62/22 65/11 70/6 70/9 72/11 74/21 75/11 77/5 77/6 81/15 85/2 85/7 85/13 85/17 90/20 91/22 95/12 99/4 100/18 103/15 104/9 104/19 104/25 105/10 105/12 105/17 105/18 105/19 105/20 105/20 105/23 116/4 116/8 116/15 116/20 116/25 117/4 121/10
Keepers' [1] 24/11
keeping [2] 115/6 115/7
Kelly [9] 30/14 32/13 70/11 70/13 71/5 71/9 72/7 101/2 105/11
Kelly Meggs [7] 30/14 32/13 70/11 70/13 71/5 71/9 105/11
Kelly Meggs' [1] 101/2
Kellye [4] 15/21 17/7 20/24 72/18
Kellye SoRelle [2] 17/7 20/24
key [1] 67/22
keynote [1] 103/3
Khan [1] 94/20
kicked [1] 103/10
kicking [1] 50/1
kill [2] 94/21 94/23
killing [1] 110/19
kind [20] 6/14 7/10 17/8 30/10 35/13 54/14 54/19 55/21 55/22 58/1 81/21 82/1 82/2 89/13 89/19 89/22 93/4 93/22 97/7 106/17
kindergarten [1] 50/4
KKK [2] 105/4 105/6
knew [10] 24/10 66/8 69/17 71/10 73/10 73/15 73/19 86/10 102/17 102/25
knocked [1] 98/7
know [45] 4/8 10/7 11/9 11/12 13/14 14/16 14/19 17/16 21/2 21/19 27/24 28/6 30/25 31/12 37/2 37/12 41/18 45/4 45/25 47/21 48/24 49/19 51/9 51/10 51/12 52/23 56/3 60/17 61/23 62/24 64/4 68/15 68/19 70/24 70/25 82/21 85/2 90/24 90/25 92/12 92/12 96/1 115/4 118/24
knowing [1] 88/14
knowingly [1] 26/4
known [6] 46/13 68/9 100/17 123/6 123/7 123/14
knows [4] 84/25 95/18 95/19 97/25
Koon [1] 81/8
Koon versus United States [1] 81/8

L

LA [1] 2/11
lack [2] 34/4 51/20
ladies [1] 97/3
laid [1] 115/5
lamppost [2] 17/23 119/6
lands [1] 110/20
landscape [1] 14/23
language [6] 4/11 9/4 37/19 38/1 45/4 65/21
laptops [1] 124/15
large [4] 10/20 86/12 97/15 105/24
LASSITER [1] 2/3
last [4] 49/6 66/9 87/9 107/14
late [2] 18/1 42/18
later [7] 6/23 11/23 23/25 43/14 46/13 58/25 72/1
Latino's [1] 100/15
latter [1] 21/11
laude [1] 115/21
laugh [1] 21/1
launched [1] 28/8
law [30] 5/12 5/24 6/18 10/9 23/9 27/14 28/6 28/7 34/20 35/6 61/1 62/7 73/12 73/23 78/6 84/5 86/19 86/23 87/1 99/8 109/19 111/3 112/16 112/24 112/24 114/3 115/22 116/1 117/9 120/9
lawful [6] 24/23 26/21 35/24 64/24 84/2 84/18
lawn [3] 2/3 2/7 100/23
laws [2] 5/3 65/3
laws' [1] 6/20
lawsuit [1] 104/18
lawyer [2] 111/7 116/3
lawyers [1] 100/10
Lazo [1] 75/4
lead [6] 33/23 47/16 48/21 86/15 98/7 104/15
lead pipe [1] 98/7
leader [14] 24/6 29/25 31/18 31/23 31/25 33/23 57/19 58/4 77/2 77/5 85/1 101/25 102/1 113/25
leaders [6] 32/8 32/18 32/21 32/22 33/24 77/25
leadership [18] 20/22 29/11 31/10 31/17 31/18 32/5 32/7 32/13 32/23 34/3 67/3 78/2 84/17 85/13 86/14 102/4 102/5 102/10
leadership/coordination [1] 32/13
leading [5] 57/21 64/23 87/21 88/19 91/16
leads [2] 24/21 32/15
least [18] 8/25 10/20 10/21 15/1 15/2 16/25 19/2 25/7 26/22 34/10 36/2 36/18 37/8 77/16 85/2 103/11 115/17 122/22
leave [1] 119/23
leaves [2] 106/20 107/23
leaving [1] 44/9
led [11] 26/19 29/24 31/2 31/4 36/8 43/1 70/11 84/1 84/11 105/20 108/13
Lee [2] 2/7 3/8
left [11] 3/19 4/3 8/8 9/10 50/11 51/15 51/22 53/23 96/25 98/16 105/24
legacies [1] 114/19
legacy [1] 114/25
legal [10] 3/20 3/22 5/5 6/14 7/2 7/6 20/2 21/4 53/5 73/11
legally [2] 53/12 57/24
legislated [1] 7/3
legislature [3] 107/20 107/24 108/1
legitimate [3] 51/14 52/22 119/14
lend [1] 42/6
length [1] 5/20
less [10] 5/9 5/23 6/19 7/1 34/1 35/4 38/3 72/10 95/15 112/22
less-demanding [1] 5/23
less-experienced [1] 34/1
lesser [2] 10/8 28/3
let [20] 3/18 12/10 13/9 15/2 16/5 17/20 20/25 22/4 47/10 63/21 64/1 67/13 79/13 83/16 91/8 109/8 110/11 111/8 113/16 115/13
let's [2] 41/19 63/12
letter [4] 9/11 13/17

L

letter... [2] 13/18 87/15
letters [1] 85/7
letting [1] 17/16
level [32] 3/23 7/18 8/6 25/6 29/22 31/11 37/22 38/17 38/24 39/3 39/20 39/21 57/17 57/18 71/4 75/15 78/1 78/3 78/4 79/17 79/20 79/21 79/21 79/22 80/6 80/8 80/14 80/21 82/25 83/1 83/13 110/6
levels [20] 38/4 39/2 40/3 40/4 76/23 76/24 77/1 77/2 77/20 79/3 79/5 79/11 80/2 80/5 83/4 83/6 83/8 83/9 83/10 83/12
liability [1] 5/19
liberty [1] 62/18
lie [2] 85/18 88/6
lies [1] 118/19
life [9] 29/25 39/3 39/4 39/9 85/12 85/24 117/22 121/8 121/8
light [5] 7/8 28/9 39/24 70/12 111/4
like [42] 14/24 22/7 22/9 24/9 27/8 29/7 30/19 31/21 39/8 41/24 42/3 49/6 51/1 53/19 55/21 58/2 73/1 85/13 85/18 89/24 89/24 91/6 91/9 91/11 92/4 93/3 93/4 96/4 96/19 98/3 98/5 99/14 99/17 104/14 104/16 106/1 113/14 113/15 114/2 119/6 121/16 127/4
likelihood [1] 111/20
likely [4] 49/15 49/16 66/9 112/3
limit [2] 57/2 93/24
limitation [1] 5/5
limitations [1] 127/1
limited [3] 11/1 112/1 112/15
Linder [13] 2/2 2/3 3/8 14/6 46/18 51/18 52/5 58/12 58/21 88/25 96/9 96/12 110/15
line [11] 19/15 19/15 24/16 24/16 47/23 49/18 50/3 57/20 75/2 76/20 115/5
Line 1 [3] 19/15 24/16 49/18
Line 2 [3] 19/15 24/16 57/20
lingered [1] 121/3
list [1] 92/19
listen [1] 49/13
listening [2] 30/23 113/17
literally [1] 39/15
literature [1] 124/2
litters [1] 49/12
little [10] 5/5 27/8 28/25 29/14 31/3 39/13 46/25 71/16 72/9 103/19
live [1] 90/1
local [1] 122/18
located [1] 123/10
location [1] 19/12
lone [2] 97/9 98/11
long [8] 5/13 39/13 60/17 75/24 95/12 95/13 108/16 121/4
long time [1] 95/13
longer [1] 59/4
look [11] 14/14 26/18 48/9 48/18 57/6 68/15 91/1 91/2 91/2 92/4 105/19
looked [6] 44/14 46/24 48/23 90/1 90/2 118/23
looking [7] 29/12 29/22 30/23 49/2 55/9 55/12 85/24
looks [1] 14/24
loss [3] 39/3 39/4 39/9
lost [3] 85/23 103/21 103/22
lot [7] 14/17 43/25 56/5 85/10 93/11 104/6 104/7
lots [1] 89/4
Louis [2] 1/16 3/6
Louis Manzo [1] 3/6
lower [3] 31/23 95/14 100/17
luck [1] 127/8
ludicrous [1] 26/8
Lustig [2] 2/13 3/10

M

made [16] 16/16 18/24 21/17 24/13 38/5 42/16 43/7 46/1 56/25 58/19 59/10 77/17 80/24 113/8 125/24 126/1
MAGA [4] 90/16 91/3 91/10 105/5
magic [2] 89/20 89/21
maimed [1] 111/12
main [2] 35/19 107/2
major [2] 15/1 86/21
make [25] 12/25 15/4 21/22 27/22 38/5 38/6 42/1 44/4 45/5 55/22 63/7 68/2 86/17 90/4 90/7 90/8 90/9 98/20 101/1 101/12 103/6 103/24 107/12 114/18 122/25
makes [6] 21/19 22/10 108/1 111/24 112/3 118/4
making [8] 22/1 41/25 65/7 70/21 73/19 76/15 107/8 120/11
man [5] 44/3 48/1 62/17 104/6 115/20
management [5] 33/20 34/1 34/6 34/23 35/5
mandatory [2] 122/12 122/17
manipulate [1] 106/23
manipulating [1] 85/12
manipulation [1] 86/7
manner [4] 58/14 59/16 107/24 125/4
many [9] 11/10 17/8 28/23 44/4 84/25 86/2 86/8 96/14 116/22
Manzo [2] 1/16 3/6
March [4] 77/8 90/16 91/4 91/10
married [1] 115/18
Martha [1] 75/4
Martha Lazo [1] 75/4
mask [1] 125/7
mass [1] 107/3
material [2] 124/2 124/6
math [1] 11/13
matter [10] 23/9 64/2 73/23 73/23 75/22 75/23 78/6 125/20 125/22 128/4
matters [2] 3/19 8/7
Matthew [2] 48/22 48/23
Matthew Peed [1] 48/23
maxing [1] 38/18
may [36] 1/5 9/1 9/2 9/25 19/11 23/21 26/2 27/22 29/1 29/10 33/19 34/4 41/2 52/24 57/2 58/13 59/16 59/18 59/22 59/24 60/13 64/16 69/23 91/6 92/25 95/18 96/4 107/24 120/3 124/23 124/24 125/19 126/8 126/19 126/20 128/7
maybe [8] 11/16 17/14 27/17 42/18 55/24 70/12 70/12 91/19
McCaughey [2] 92/17 94/8
McCord [2] 9/12 13/17
me [46] 3/18 9/15 11/3 11/20 12/10 12/13 13/9 14/6 14/6 14/20 15/2 19/19 20/25 22/4 27/23 47/10 48/24 55/11 63/21 64/1 67/13 68/17 69/15 70/14 78/8 79/13 80/2 89/15 89/18 91/8 101/1 101/21 101/21 101/22 102/21 102/21 102/22 104/12 106/18 107/7 108/22 109/8 111/8 113/16 115/13 125/5
mean [15] 16/14 27/23 29/5 37/12 40/16 55/19 67/19 72/14 91/16 93/9 94/3 113/20 113/21 120/23 121/3
meaning [2] 72/24 88/24
means [13] 3/25 4/1 29/15 65/23 65/25 66/3 78/22 80/12 108/4 110/25 111/8 117/19 119/9
meant [3] 16/25 18/6 105/4
measures [1] 112/23
mechanical [1] 2/19
media [11] 92/1 105/9 105/10 106/16 123/19 123/20 123/21 123/23 123/23 124/2 124/3
medical [1] 109/22
meet [1] 112/21
meeting [2] 46/15 59/4
meets [1] 78/7
Meggs [42] 18/25 19/4 19/19 19/23 30/11 30/14 32/13 33/3 33/7 33/9 42/7 43/2 43/8 43/21 44/12 45/23 46/5 46/8 46/10 47/12 47/13 47/15 49/14 49/24 49/25 51/8 52/9 52/16 54/4 54/12 54/23 70/11 70/13 70/21 70/25 71/2 71/5 71/9 75/7 77/12 77/25 105/11
Meggs' [2] 101/2 101/18
MEHTA [2] 1/9 63/18
melee [1] 68/20
member [1] 123/6
members [14] 19/5 36/19 36/19 53/9 66/1 73/25 74/8 74/10 75/9 84/2 86/3 91/20 110/23 115/3
memo [9] 21/17 27/10 30/9 40/5 40/7 40/20 44/1 49/12 87/13
memorandum [9] 13/13 13/15 13/24 23/13 28/16 29/16 94/6 94/14 95/1
memos [3] 85/11 89/9 89/17
men [3] 77/22 99/8 102/11
mentioned [5] 4/24 55/1 72/14 72/14 95/1
mentions [2] 94/7 107/2
merely [2] 58/17 76/11
Merit [1] 2/15
merits [1] 113/24
message [7] 15/20 20/21 32/14 33/6 67/11 72/21 73/10
messages [19] 15/14 18/20 18/21 19/3 20/21 20/23 21/7 30/2 30/19 32/19 61/18 61/18 65/25 66/3 67/4 72/22 73/9 86/22 123/24
met [2] 8/5 44/7
mete [1] 60/2
Metropolitan [1] 74/24
Mexican [1] 104/22
Michael [6] 44/22 52/10 52/13 53/17 54/12 54/22
Michael Greene [5] 52/10 52/13 53/17 54/12 54/22
middle [1] 83/23
might [14] 12/24 29/21 31/16 34/2 35/3 37/21 38/6 38/10 38/24 41/14 66/6 66/12 113/9 118/12
military [16] 52/13 52/14 53/16 53/18 54/11 55/5 81/3 81/5 86/3 95/10 98/10 102/2 103/22 115/23 116/6 116/24
militia [1] 103/19
millennia [1] 48/5
million [4] 10/22 90/16 91/3 91/10
Million MAGA March [1] 91/10
Million MAGA Rally [2] 90/16 91/3
millions [2] 90/13 90/13
mind [7] 30/13 62/11 69/14 89/21 89/22 97/19 114/19
minded [2] 81/15 116/15
mindedness [1] 81/5
minds [3] 46/15 59/5 85/16
Minuta [2] 31/2 77/21
minutes [7] 19/16 56/8 58/20 60/18 63/12 106/9 108/22
misconstrued [1] 51/6
misdemeanor [1] 105/16
misled [1] 51/7
misses [1] 20/2
missing [3] 9/19 12/4 13/24
mission [2] 25/2 100/7
mistake [2] 64/16 114/18
MMS [1] 123/24
mob [6] 56/5 56/6 56/13 74/8 74/22 74/23
mobile [3] 124/15 125/9 125/14
moment [6] 48/18 79/24 110/9 118/10 119/22 120/2
momentarily [1] 64/12
moniker [1] 60/5
monitor [1] 124/9
monitoring [5] 124/12 124/14 124/18 124/19 124/21
monstrous [1] 28/21

M

month [1] 95/16
months [16] 27/4 36/7 37/2 56/22 83/14 92/2 92/9 92/15 92/16 92/17 92/18 92/20 95/15 109/9 122/5 122/7
more [28] 4/4 5/25 8/3 11/15 14/17 26/20 35/16 38/22 45/3 46/25 47/16 49/15 60/2 60/8 79/6 79/14 82/16 92/8 92/9 92/21 93/5 93/7 94/10 95/16 107/12 111/24 112/3 117/4
more-nuanced [1] 11/15
morning [4] 3/2 3/14 3/16 52/3
most [16] 13/22 23/16 54/3 59/8 65/19 77/22 79/23 86/12 87/6 88/16 92/21 105/24 110/4 110/4 113/2 117/6
mostly [1] 8/25
motion [1] 64/7
motions [1] 89/9
motive [3] 78/11 78/13 113/14
mouth [1] 93/12
move [4] 13/3 13/7 35/18 83/17
movement [1] 105/5
moving [6] 19/6 29/5 29/9 41/9 42/14 47/24
Mr [1] 20/5
Mr. [295]
Mr. Alpers [2] 17/13 17/24
Mr. Berry [2] 18/16 71/2
Mr. Berry's [1] 71/3
Mr. Bright [10] 9/14 14/5 52/2 52/7 54/20 58/7 60/12 67/13 69/19 89/3
Mr. Caldwell [1] 31/7
Mr. Dolan [10] 18/15 30/9 43/4 43/25 44/2 44/2 44/5 45/3 47/9 71/14
Mr. Dolan's [7] 17/25 44/13 44/24 45/7 45/13 46/25 69/22
Mr. Greene [17] 32/11 32/15 32/17 45/8 45/9 45/11 45/12 45/21 77/24 101/7 101/15 101/22 101/24 102/2 102/6 102/7 102/21
Mr. Greene's [5] 19/18 19/21 67/23 72/9 72/12
Mr. Harrelson [4] 30/11 43/4 44/7 75/7
Mr. Head [1] 92/16
Mr. James [4] 20/12 20/15 77/13 77/25
Mr. James's [1] 75/4
Mr. Linder [10] 7/6 46/18 51/18 52/5 58/12 58/21 88/25 96/9 96/12 110/15
Mr. Meggs [29] 18/25 19/4 19/19 19/23 30/11 33/3 33/7 33/9 42/7 43/2 43/8 43/21 44/12 45/23 46/5 46/8 46/10 47/12 47/13 47/15 49/14 51/8 52/9 70/21 70/25 71/2 75/7 77/12 77/25
Mr. Meggs' [1] 101/18
Mr. Michael Greene [1] 44/22
Mr. Minuta [1] 31/2
Mr. Nestler [3] 44/11 93/17 94/5
Mr. Nestler's [1] 94/14
Mr. Parker [1] 30/20
Mr. Rhodes [140]
Mr. Rhodes' [30] 11/23 18/22 19/11 19/22 20/9 20/20 21/9 21/12 21/22 25/7 26/18 32/1 32/3 32/20 36/6 37/5 38/10 42/14 42/19 44/25 45/5 45/13 46/4 65/10 66/20 71/12 80/23 85/11 85/14 88/14
Mr. Siekerman [4] 32/10 32/14 32/18 77/24
Mr. Tarpley [1] 60/14
Mr. Vallejo [1] 31/3
Mr. Woodward [2] 37/15 38/2
Mr. Woodward's [2] 37/11 38/2
Mr. Young [2] 18/16 30/12
Mr. Zaremba [1] 27/5
Ms. [8] 21/4 40/23 51/23 55/14 75/1 83/18 88/24 106/13
Ms. Rakoczy [5] 40/23 55/14 83/18 88/24 106/13
Ms. SoRelle [2] 21/4 51/23
Ms. Watkins [1] 75/1
much [13] 10/2 10/11 20/9 21/18 24/5 27/18 30/22 31/13 39/8 63/13 71/25 95/14 127/7
multiple [11] 5/13 8/25 14/10 15/13 16/24 19/3 32/6 44/1 94/15 102/25 114/17
must [24] 8/21 34/11 48/19 88/22 109/10 109/15 122/18 122/19 122/20 122/24 122/25 123/5 123/15 123/17 123/20 123/21 124/1 124/6 124/10 124/13 124/22 125/5 125/6
mutual [1] 66/5
my [42] 9/13 10/24 11/17 11/17 13/5 15/23 17/16 28/4 34/16 42/23 45/15 45/15 47/9 48/22 50/3 65/8 67/14 67/18 69/14 77/22 93/9 96/10 96/19 96/21 96/21 97/19 100/10 100/12 101/6 102/20 104/7 104/12 104/21 107/14 108/6 108/17 109/9 114/6 114/19 116/19 116/20 121/8
myself [1] 101/15

N

NAACP [1] 104/24
naive [1] 70/12
name [4] 13/18 72/14 72/15 92/10
named [1] 15/25
names [1] 99/16
Nancy [1] 119/5
Nancy Pelosi [1] 119/5
narrative [5] 91/24 92/2 105/8 106/17 108/3
nation [1] 88/17
national [2] 50/15 112/14
nationalist [2] 113/20 116/10
natural [1] 48/16
nature [4] 58/20 79/13 109/15 111/5
Nazis [2] 98/22 98/22
near [1] 19/13
necessarily [6] 23/10 23/11 28/6 29/17 38/17 79/16
necessary [11] 6/15 6/19 8/13 9/1 9/6 18/23 26/16 40/22 86/23 109/13 112/23
necessity [1] 96/24
need [25] 11/19 11/22 15/14 21/4 23/6 38/16 39/9 47/18 54/10 69/2 69/3 69/4 85/18 91/1 91/13 91/14 98/16 109/17 109/21 110/23 111/1 117/3 117/8 118/12 122/1
needed [4] 66/17 66/20 74/3 78/23
needs [4] 7/25 28/13 91/2 91/2
nefarious [1] 54/4
neither [4] 6/15 7/5 87/8 111/10
Nestler [5] 1/14 3/5 44/11 93/17 94/5
Nestler's [1] 94/14
never [11] 16/5 43/12 51/10 61/21 62/11 63/2 66/18 102/5 117/24
nevertheless [3] 8/15 47/1 76/21
new [4] 65/24 105/19 113/14 113/15
New York [1] 105/19
next [15] 22/4 29/10 30/25 43/2 45/21 61/13 61/13 61/13 97/7 98/24 100/16 100/24 101/4 106/20 110/4
night [3] 27/13 97/4 106/14
nine [5] 23/12 29/20 31/14 35/13 99/21
Ninth [3] 4/8 4/11 40/11
Ninth Circuit [1] 40/11
no [60] 1/4 6/7 7/1 14/2 15/9 17/7 17/24 25/15 28/24 30/16 38/1 42/13 46/14 46/15 46/15 49/10 49/10 49/22 50/16 51/10 54/16 54/17 54/25 56/11 56/24 58/2 59/4 61/8 61/18 61/18 62/12 62/21 64/16 68/25 69/14 72/6 73/3 75/21 80/4 80/16 80/19 81/1 86/7 86/24 86/24 90/4 94/24 95/9 102/5 103/7 103/8 103/8 103/10 104/1 107/2 112/24 114/18 119/20 127/5 127/6
nobody [4] 50/19 52/9 115/6 118/18
nod [3] 57/9 57/10 59/6
none [12] 45/25 54/11 56/2 92/23 94/9 97/15 97/18 103/13 104/8 110/10 116/17 116/18
Nonetheless [1] 6/18
Nordean [1] 59/3
normally [1] 111/24
north [4] 11/12 11/14 33/5 100/16
North Carolina [1] 33/5
northeast [2] 100/21 100/22
not [220]
notable [1] 95/10
notably [2] 19/8 117/6
note [15] 19/21 20/10 33/13 33/17 33/18 34/19 36/2 36/21 37/19 40/4 41/15 59/15 78/5 79/19 83/22
Note 4 [5] 36/2 36/21 41/15 59/15 78/5
Note A [1] 37/19
noted [3] 4/2 5/11 27/12
notes [2] 21/8 45/15
nothing [18] 7/20 7/21 14/2 37/18 41/19 44/10 51/5 55/4 59/17 61/19 62/9 73/1 79/4 90/10 94/4 105/16 119/24 119/24
notice [2] 74/3 126/17
notify [1] 126/5
notion [3] 34/25 35/12 112/8
notwithstanding [3] 7/23 8/23 27/15
November [5] 36/12 56/22 77/7 90/12 120/17
November 14th [1] 77/7
now [23] 11/22 13/19 15/18 22/4 25/20 27/22 40/22 51/8 53/10 54/15 56/13 56/16 64/18 69/2 70/24 83/17 87/20 90/9 91/22 114/12 114/22 115/16 115/18
nuanced [1] 11/15
number [4] 3/3 13/14 79/6 107/24
numerous [1] 87/23
NW [2] 1/17 2/17

O

Oak [2] 2/3 2/7
oath [71] 5/18 10/25 15/23 20/17 21/7 24/11 29/25 32/15 39/15 44/3 46/4 49/22 51/24 53/7 53/8 54/1 54/18 56/1 56/6 56/8 56/12 56/14 57/20 58/5 62/22 65/11 70/6 70/9 72/11 74/21 75/11 77/5 77/6 81/15 85/2 85/7 85/13 85/17 90/20 91/22 95/12 99/4 99/9 100/18 103/7 103/8 103/9 103/10 103/13 103/14 103/16 104/9 104/19 104/25 105/10 105/12 105/17 105/18 105/19 105/20 105/20 105/23 108/7 116/4 116/8 116/15 116/20 116/25 117/4 120/12 121/10
Oath Keeper [1] 99/9
Oath Keepers [52] 5/18 10/25 29/25 39/15 49/22 51/24 53/7 53/8 54/1 54/18 56/1 56/6 56/12 56/14 57/20 58/5 62/22 65/11 70/6 72/11 74/21 75/11 77/5 77/6 81/15 85/2 85/7 85/13 85/17 90/20 91/22 95/12 99/4 100/18 104/9 104/19 104/25 105/10 105/12 105/17 105/18 105/19 105/20 105/20 105/23 116/4 116/8 116/15 116/20 116/25 117/4 121/10

O

Oath Keepers' [1] 24/11
oaths [2] 115/6 115/7
object [3] 60/25 75/4 111/20
objection [3] 15/7 16/18 42/4
objections [10] 13/16 14/21 16/16 41/7 58/18 59/10 59/21 60/4 89/10 127/3
objective [4] 65/6 68/10 78/20 82/16
objectives [2] 66/17 109/13
objects [2] 64/25 121/24
obligation [1] 126/7
obligations [1] 126/2
observed [1] 84/11
observes [1] 33/18
obstruct [4] 26/5 26/7 67/16 83/3
obstructed [2] 75/24 75/24
obstruction [6] 24/18 28/2 76/24 76/25 82/19 83/10
obstructive [2] 27/21 27/24
obvious [1] 10/14
obviously [7] 9/14 14/22 29/23 42/13 46/10 97/20 116/6
Occam's [1] 49/15
Occam's razor [1] 49/15
occasions [1] 90/15
occurred [1] 43/1
odd [1] 92/8
off [4] 6/8 19/12 54/9 54/23
offense [28] 8/9 12/22 22/12 23/17 25/11 25/16 25/17 29/8 36/23 37/6 57/19 78/10 82/19 82/25 83/7 83/9 83/13 109/16 109/18 109/20 111/2 111/5 112/6 112/12 112/19 113/3 113/4 113/6
offensive [3] 16/19 104/13 104/22
office [20] 1/16 3/11 15/15 15/19 21/19 21/24 66/7 75/12 75/12 120/6 122/13 123/22 124/7 124/9 124/10 125/15 125/18 125/19 126/8 126/10
Office's [1] 13/12
officer [23] 2/13 56/21 69/11 74/20 74/24 92/24 102/3 102/6 102/8 103/11 103/23 103/24 103/25 104/2 111/11 111/12 122/25 123/12 123/16 124/13 124/24 125/16
Officer Carrion [1] 74/20
Officer Christopher Owens [1] 74/24
officers [19] 74/13 74/14 74/20 74/25 75/3 79/2 92/14 92/21 98/10 99/3 102/1 102/2 102/4 104/4 104/8 110/7 112/10 115/1 115/8
Officers Salke [1] 74/20
offices [1] 26/25
Official [1] 2/16
officials [1] 107/22
often [3] 28/3 36/10 111/23
oh [3] 9/20 80/12 105/19
OK [1] 16/8
okay [15] 3/18 13/9 14/4 14/13 22/3 37/13 40/23 55/20 58/12 60/12 60/20 64/4 109/7 119/15 121/2
old [5] 17/8 20/22 50/3 67/3 115/16
Old Leadership [2] 20/22 67/3
once [4] 69/9 73/2 73/2 117/4
one [64] 5/24 6/7 7/25 8/24 9/20 10/15 16/13 18/6 26/13 28/5 42/3 44/20 44/21 52/7 52/9 53/9 60/4 60/14 61/7 64/3 64/11 67/6 67/6 67/22 68/11 70/3 70/4 70/17 70/19 71/23 72/22 76/4 77/17 77/22 78/10 79/12 81/8 84/9 87/5 91/24 92/2 92/20 96/5 98/5 103/21 104/16 105/7 107/2 107/14 107/16 110/14 111/10 111/25 112/11 113/7 113/8 113/8 113/12 113/16 115/10 115/10 118/10 118/22 122/21
one's [1] 54/25
ones [1] 56/1
ongoing [3] 28/10 118/1 120/14
online [3] 123/18 125/7 125/9
only [22] 5/8 17/16 23/23 33/14 53/3 66/25 67/6 71/10 74/16 77/6 79/5 79/9 81/5 81/19 92/9 96/19 102/2 107/16 115/3 118/13 119/4 124/25
op [7] 19/5 32/5 32/7 32/15 32/21 33/23 77/25
op-ed [1] 35/23
op leaders [1] 32/21
open [9] 3/19 3/20 4/3 8/8 9/10 9/18 26/24 50/21 85/7
open-ended [2] 3/19 8/8
opened [1] 44/17
opening [6] 27/10 28/16 29/15 30/9 40/5 62/17
openly [2] 85/8 97/21
operate [3] 76/17 102/9 102/10
operation [2] 32/11 33/2
operational [1] 33/9
operations [2] 99/21 102/1
opinion [3] 8/17 9/4 93/9
opinions [1] 112/19
opportunities [1] 14/11
opportunity [4] 14/7 14/9 95/24 96/15
oppose [6] 15/9 26/21 64/24 66/12 84/18 84/23
opposed [4] 27/20 27/25 31/15 35/15
opposing [1] 96/20
opposition [3] 87/18 88/1 88/10
option [1] 99/24
options [1] 122/14
orchestrated [3] 29/23 36/7 84/20
orchestrates [1] 24/21
order [27] 7/12 19/20 19/24 20/8 22/4 36/4 43/7 46/7 49/10 54/21 55/4 55/5 55/6 58/1 67/13 68/24 80/8 83/3 84/23 85/19 86/5 86/12 109/6 109/25 114/5 125/25 126/11
ordered [5] 50/18 54/6 56/7 92/25 122/9
ordering [1] 54/4
orders [4] 49/24 54/17 70/4 123/2
ordinarily [1] 7/24
ordinary [1] 84/9
Oregon [2] 40/6 80/4
organization [16] 36/16 36/17 47/15 54/14 70/2 70/3 76/22 78/2 104/7 104/8 105/7 106/4 116/9 116/20 116/22 123/7
organize [1] 87/9
organized [1] 36/15
organizer [3] 57/19 58/4 77/2
organizing [4] 31/8 39/6 70/4 77/20
original [2] 107/18 117/24
originally [1] 41/5
Ortega [1] 28/20
other [68] 8/7 8/8 9/20 11/4 21/7 21/8 27/1 31/5 33/15 35/15 35/19 36/17 44/16 44/18 49/22 50/11 54/8 54/25 56/4 56/13 65/13 65/25 66/1 66/3 67/10 67/19 68/21 69/25 74/1 74/2 74/8 74/24 77/19 78/10 80/11 80/12 80/13 81/18 82/20 84/7 84/23 84/25 85/15 86/2 99/14 100/1 103/14 103/21 105/12 105/14 106/14 107/19 110/2 110/15 110/18 110/23 113/6 113/13 113/22 114/11 114/25 117/9 117/12 120/23 122/18 123/7 123/22 124/22
others [36] 8/22 15/21 18/18 18/25 20/21 20/22 21/6 22/21 23/4 24/20 25/8 31/1 31/7 31/15 32/24 35/17 37/3 46/12 66/1 67/7 73/8 73/16 73/25 74/22 75/1 75/1 75/7 79/1 86/15 92/5 96/23 110/25 112/10 113/10 117/20 125/8
others' [1] 18/10
otherwise [10] 7/22 9/2 17/5 18/13 18/21 70/8 89/15 118/18 123/5 123/14
ought [3] 12/22 57/17 121/23
our [62] 3/19 23/13 27/9 27/10 28/15 29/15 29/15 29/16 29/19 30/9 31/10 34/13 38/21 40/5 40/7 40/20 41/7 42/9 42/10 42/11 42/18 43/9 43/17 46/19 52/16 57/7 57/14 57/23 58/19 59/21 60/4 84/2 85/10 85/19 85/20 86/20 87/3 88/21 96/20 98/16 99/6 99/8 99/18 99/20 99/23 101/8 101/14 101/14 102/15 102/19 102/23 103/9 104/8 106/3 107/4 114/20 114/21 114/21 114/22 115/23 118/2 118/25
ourselves [1] 120/19
out [38] 5/22 7/12 15/15 16/9 20/1 20/6 22/3 38/18 40/6 45/19 46/5 48/23 49/9 51/3 53/6 53/8 54/23 58/16 60/2 61/1 61/15 66/17 82/22 90/6 90/6 90/6 93/13 96/2 96/13 96/24 99/5 105/13 106/5 106/20 106/23 110/15 110/17 114/4
outcome [3] 6/16 6/17 114/2
outlier [1] 88/18
outset [2] 64/1 67/14
outside [15] 51/14 53/20 53/23 60/11 75/8 75/11 88/5 97/24 98/2 98/9 100/12 101/9 102/14 121/18 123/10
outskirts [1] 25/1
outstanding [1] 12/4
over [21] 6/7 6/8 6/10 6/10 8/22 12/12 24/8 27/4 33/12 33/20 34/1 34/6 45/14 45/18 52/17 84/21 87/19 95/23 102/7 102/16 125/22
overall [4] 32/6 32/11 32/15 32/18
overcharged [1] 107/10
overcome [1] 117/21
overheard [2] 44/9 44/12
overreach [1] 27/23
overrule [1] 14/22
Owens [1] 74/24
own [19] 5/19 20/9 29/3 32/1 32/20 66/25 67/1 73/5 86/4 86/6 93/8 95/6 96/15 103/17 103/19 103/19 107/18 116/24 118/17

P

P. [1] 63/18
p.m [5] 19/4 19/4 109/1 109/1 127/11
page [7] 26/1 30/9 40/7 44/1 71/21 80/3 80/4
pages [1] 94/13
pages 79 [1] 94/13
paid [1] 126/7
paint [1] 113/18
paper [1] 67/20
parading [1] 105/16
paragraph [5] 14/20 14/20 55/14 56/16 57/20
paragraphs [1] 55/12
parallels [3] 9/24 10/13 10/14
paramilitary [2] 25/5 36/17
park [2] 99/1 100/17
Parker [2] 30/16 30/20
Parker's [1] 47/23
Parliamentarian [2] 61/5 61/16
Paroline [6] 4/19 5/6 5/23 6/21 7/9 9/23
parse [1] 57/12
part [24] 7/2 19/2 21/22 23/18 24/3 27/6 30/10 30/15 31/16 35/14

P

part... [14] 44/19 46/13 46/21 59/25 63/2 82/17 102/19 103/8 104/22 105/24 112/21 121/5 121/6 122/14
participant [4] 33/16 90/19 91/6 96/7
participants [5] 31/6 44/20 49/9 85/3 92/3
participate [3] 24/17 25/5 84/21
participated [2] 26/22 91/22
participating [1] 35/23
participation [3] 8/9 24/11 39/4
particular [14] 5/13 6/21 7/13 7/15 9/7 9/8 10/11 22/7 23/21 24/9 27/12 110/17 112/2 113/25
particularly [7] 18/22 24/24 30/5 31/19 46/25 47/8 110/6
parties [2] 12/13 12/19
parties' [1] 83/17
partnership [1] 111/17
parts [1] 50/10
party [1] 105/7
pass [3] 21/1 116/19 116/20
passed [1] 37/2
passing [1] 20/23
past [1] 58/20
path [4] 84/12 108/14 111/22 121/15
Patrick [1] 40/6
Patriots [1] 19/10
pattern [2] 98/14 117/23
patting [1] 50/12
pay [1] 122/9
payable [1] 126/3
paying [1] 71/25
payments [1] 125/24
peacefully [3] 98/25 106/1 107/5
Peed [2] 48/22 48/23
peers [1] 114/18
pejorative [1] 116/12
Pelagius [1] 48/11
Pelosi [2] 17/22 119/5
penalty [1] 112/17
Pennsylvania [1] 107/16
people [87] 6/6 10/18 11/10 17/15 17/15 19/6 19/12 19/14 25/3 30/22 31/8 31/14 32/12 33/22 33/23 33/25 34/2 47/16 50/12 50/12 51/21 52/14 53/7 53/24 54/9 54/13 54/20 56/4 56/13 57/4 57/4 58/1 68/6 68/14 68/21 68/24 69/7 69/13 73/5 76/15 76/20 85/6 85/12 88/12 90/3 90/5 90/7 91/18 91/20 91/23 92/1 92/7 92/8 92/9 92/20 93/2 93/12 94/7 95/3 95/5 95/16 96/2 96/6 97/9 97/16 97/23 98/3 98/11 98/19 100/4 100/4 101/3 103/14 105/14 107/11 107/12 112/11 113/5 115/2 115/11 116/11 116/13 116/14 116/17 118/6 122/1 124/22
pepper [2] 99/10 103/12
pepper-sprayed [1] 103/12
per [4] 11/14 46/13 58/22 122/10
perceived [2] 28/9 30/3
percent [3] 48/25 72/8 104/8
perception [1] 77/16
perhaps [5] 11/5 26/6 59/24 75/21 119/22
peril [1] 118/1
period [5] 36/11 75/11 75/19 75/24 76/13
periodic [2] 122/22 124/11
permission [1] 126/19
permit [1] 124/9
permits [1] 11/20
person [16] 3/12 6/9 6/11 7/15 7/17 10/2 10/11 26/8 44/19 47/8 74/7 83/2 93/7 93/10 93/10 120/5
person's [1] 6/7
personal [2] 102/5 117/22
persons [3] 8/20 123/8 123/10
persons' [1] 7/15
perspective [11] 12/7 12/8 31/10 36/21 38/15 48/5 48/9 48/15 48/18 87/11 95/8
persuading [1] 66/1
persuasive [1] 75/20
Peter [1] 92/11
phillip [3] 2/2 2/6 3/8
Phillip Linder [1] 3/8
phone [24] 14/11 19/25 42/16 43/19 46/6 47/22 47/23 47/24 49/6 49/24 51/6 52/8 52/11 54/2 54/21 55/2 55/23 55/24 58/10 67/18 67/24 88/5 106/14 123/21
photos [3] 102/15 123/24 124/3
physical [7] 74/7 74/9 74/13 75/9 83/2 104/6 111/13
pieces [1] 77/19
pipe [1] 98/7
place [10] 19/16 44/21 61/11 62/3 62/6 62/8 63/7 117/19 121/22 121/23
placement [1] 122/21
plain [3] 7/5 37/19 37/25
Plaintiff [1] 1/4
plan [10] 43/12 43/13 46/14 62/20 63/2 69/12 82/17 90/18 90/20 90/21
planning [13] 29/6 33/4 36/16 56/23 59/4 71/4 76/9 76/12 76/15 76/18 76/21 79/21 83/7
plans [4] 54/17 93/5 93/15 121/24
plausible [1] 69/1
play [4] 29/17 29/18 29/21 33/23
played [5] 29/7 31/8 31/17 69/23 84/17
playing [2] 39/13 89/23
plead [1] 20/16
please [4] 47/11 63/19 101/16 109/5
pled [1] 94/16
plenty [1] 18/20
plotted [3] 35/25 86/10 94/24
plotting [2] 33/3 94/21
plus [6] 5/4 10/22 25/11 29/6 38/18 110/4
point [19] 4/14 12/2 12/25 20/2 25/14 37/11 37/14 43/24 51/24 53/9 55/13 56/16 71/23 75/13 80/19 96/11 96/14 99/6 113/25
pointed [4] 19/17 61/14 110/15 110/17
points [8] 5/22 8/11 20/1 24/19 34/12 34/12 44/4 60/22
police [25] 28/21 56/10 69/11 74/25 75/2 79/2 98/10 98/18 99/3 102/2 102/3 102/4 102/8 102/18 103/11 103/23 103/24 104/7 104/8 110/7 111/11 111/12 112/9 115/1 115/7
policies [1] 113/24
policy [1] 87/25
political [10] 86/18 87/9 87/23 88/9 88/16 96/19 96/22 105/24 107/9 114/9
politicians [1] 92/1
politics [1] 114/21
pornography [5] 9/25 10/3 10/5 10/17 10/17
portion [2] 10/20 11/8
pose [1] 88/21
posed [1] 112/22
position [7] 23/9 23/13 24/1 29/19 34/9 42/9 65/10
positive [5] 116/6 116/8 116/23 118/24
Posner [2] 27/11 29/1
possess [3] 122/19 124/1 124/5
possible [2] 47/25 111/24
possibly [1] 27/10
posted [2] 13/19 101/14
potential [3] 5/8 73/11 111/18
potentially [4] 11/1 18/18 113/11 117/5
Potomac [1] 74/3
Potomac River [1] 74/3
pounding [2] 19/10 19/13
Poverty [1] 99/7
power [21] 15/9 24/24 26/21 35/24 36/20 61/25 62/2 63/5 64/24 65/4 65/24 66/13 68/11 69/5 74/4 79/24 84/3 84/18 87/22 97/14 97/22
practiced [1] 21/2
pray [1] 17/9
precedent [4] 8/12 8/14 16/23 18/8
precise [1] 69/11
precisely [1] 47/24
preclude [1] 41/25
predict [2] 51/2 88/7
predicted [2] 50/20 51/1
prefer [1] 98/3
preordained [1] 104/16
prep [1] 45/15
preparation [3] 76/18 76/22 83/8
prepare [1] 118/8
prepared [9] 3/17 9/17 20/13 39/7 114/5 120/3 121/11 121/14 121/15
preponderance [11] 11/5 20/3 38/10 64/10 64/14 64/15 64/20 65/5 69/16 73/14 73/19
prescient [1] 50/19
presence [3] 74/8 75/7 99/3
present [5] 65/21 81/6 81/23 117/25 119/11
presented [2] 13/23 49/18
presentence [10] 12/14 12/17 13/11 13/16 14/8 15/4 55/10 122/14 126/8 126/12
presenting [2] 49/1 49/1
presents [1] 111/18
preserve [2] 59/14 62/18
preside [1] 27/3
president [22] 15/15 15/15 15/18 17/18 21/19 21/23 29/25 37/3 39/14 62/5 66/6 66/10 96/19 97/12 104/21 104/25 106/25 107/1 113/12 113/20 114/12 120/6
President Biden [3] 15/15 21/19 21/23
President Trump [7] 17/18 37/3 66/10 96/19 97/12 104/25 106/25
Presidential [8] 24/24 35/25 61/25 62/2 63/5 64/25 84/3 87/22
presiding [1] 63/18
presume [1] 3/17
pretrial [1] 15/4
pretty [14] 14/1 14/23 29/6 39/7 39/8 39/10 44/14 45/6 45/23 71/7 71/15 71/23 73/13 79/24
Prettyman [1] 2/16
prevent [6] 15/18 15/23 21/23 69/4 97/12 97/14
prevented [1] 16/3
preview [3] 12/10 23/7 29/20
previous [2] 58/18 94/14
previously [1] 84/7
primarily [1] 42/3
primary [1] 112/18
principles [1] 7/8
prior [6] 16/12 68/9 81/19 92/13 99/21 124/18
prison [1] 108/17
prisoner [3] 96/19 107/9 114/9
Prisons [1] 122/4
pro [2] 18/4 18/4
pro-Biden [1] 18/4
pro-Trump [1] 18/4
probability [1] 111/21
probably [8] 4/21 14/25 26/24 27/5 71/24 89/9 96/11 104/7
probation [22] 2/13 3/11 3/21 13/12 56/20 122/13 122/25 123/11 123/16 123/17 123/22 124/6 124/9 124/10 124/13 124/24 125/15 125/16 125/18 126/8 126/10 126/13
problem [2] 102/12 102/13
problems [1] 35/9
procedure [4] 60/24 61/2 61/11 63/7
proceed [3] 3/17 12/11 13/5
proceeded [2] 62/25 80/16
proceeding [3] 26/6

P

proceeding... [2] 26/7 41/18
proceedings [8] 1/9 2/19 3/13 5/21 75/17 75/18 127/11 128/4
process [2] 43/3 117/21
proclaimed [1] 97/12
procured [1] 22/18
produce [1] 6/16
produced [1] 2/19
products [1] 125/12
professionals [2] 99/20 117/11
Professor [2] 9/12 87/12
Professor McCord [1] 9/12
Professor Sam Jackson [1] 87/12
proffer [1] 20/15
prohibited [1] 124/17
prolific [1] 73/2
prominent [1] 5/24
promote [4] 38/12 109/19 111/2 124/3
proof [2] 66/15 112/20
propaganda [1] 118/19
proper [1] 60/3
property [11] 10/19 11/2 24/21 25/8 33/20 34/6 38/8 38/14 56/2 56/10 83/2
proportionality [3] 80/9 80/10 110/23
proposed [1] 41/7
proposition [3] 5/2 8/20 79/4
prosecute [3] 27/2 27/4 27/24
prosecuted [1] 97/19
prosecution [4] 27/20 67/7 106/15 107/7
prosecutorial [2] 28/8 31/13
prosecutors [1] 94/25
protect [10] 67/7 73/8 73/9 97/8 100/6 109/20 115/3 115/3 115/4 116/17
protected [8] 21/9 21/14 21/15 96/21 97/6 97/23 98/25 100/12
protected them [1] 97/6
protectees [1] 68/15
protecting [3] 96/22 97/3 99/2
Protection [1] 87/17
Proud [5] 99/14 104/19 104/25 105/22 105/23
Proud Boys [3] 99/14 104/25 105/22
provide [12] 13/1 14/10 27/16 32/19 40/2 52/25 64/18 109/19 109/21 111/3 111/8 121/16
provided [6] 10/6 21/22 30/18 40/19 87/11 100/18
provides [3] 6/5 40/12 127/1
providing [2] 20/24 125/13
proximate [3] 4/10 4/22 5/3
proximate-cause [1] 4/22
PSD [1] 103/1
PSR [4] 14/12 14/16 42/5 56/21
PSRs [1] 89/10
public [7] 90/23 91/2 95/18 100/9 103/7 109/21 111/18
pulled [2] 50/24 103/22
Punch [1] 98/22
punched [1] 103/10
punching [1] 99/10
punish [1] 112/16
punishment [5] 60/2 60/7 60/11 109/19 111/3
puppet [1] 16/9
puppets [1] 16/5
purchases [2] 20/1 20/5
purely [1] 23/22
purpose [7] 6/20 7/21 36/5 71/4 79/22 112/4 126/1
purposes [9] 4/23 7/12 10/9 15/3 22/1 55/10 63/24 82/24 111/23
pursuant [6] 62/4 62/7 63/6 124/24 124/25 126/23
push [1] 88/6
pushed [2] 103/18 103/22
pushing [2] 6/6 75/2
put [14] 11/21 28/15 31/14 41/19 56/15 85/7 91/25 91/25 101/25 102/1 102/4 102/11 107/4 113/2
puts [3] 55/24 121/18 121/22
putting [3] 28/15 28/18 117/20

Q

QAnon [1] 90/8
QAnon Shaman [1] 90/8
QRF [9] 16/18 16/25 18/6 31/4 31/21 33/4 33/8 33/24 39/16
quality [2] 4/3 47/14
question [21] 4/14 4/17 4/18 8/11 10/2 10/24 11/7 12/20 22/10 24/6 25/10 34/8 41/2 49/4 51/8 67/12 69/15 89/23 97/16 120/5 121/10
questioned [1] 116/18
questioning [1] 47/4
questions [4] 3/22 3/25 25/14 41/6
quick [3] 24/25 33/6 60/22
Quick Reaction Force [2] 24/25 33/6
quiet [2] 99/19 99/20
Quigley [1] 35/7
quite [5] 36/13 61/25 110/6 112/10 121/4
quote [2] 42/23 44/2
quotes [2] 36/13 106/18

R

racist [2] 105/5 116/10
racists [1] 108/13
radicalize [2] 85/14 86/14
ragtag [1] 54/13
Rahman [1] 94/19
raise [2] 3/21 127/4
raised [6] 3/24 8/12 12/17 14/17 15/2 21/8
Rakoczy [7] 1/14 3/5 40/23 55/14 83/18 88/24 106/13
rallies [3] 97/25 98/10 98/17
rally [12] 17/7 88/5 90/16 90/17 91/3 91/5 91/10 91/11 98/1 98/17 98/24 100/15
ranch [1] 117/6
Randolph [1] 8/18
Randolph's [1] 9/3
range [5] 83/14 83/15 83/24 89/19 94/3
rank [1] 32/8
rare [2] 80/20 80/20
rather [2] 16/19 78/12
razor [1] 49/15
re [5] 6/5 42/19 50/7 51/5 52/21
re-hearing [1] 42/19
re-statement [1] 6/5
re-try [2] 50/7 52/21
re-urge [1] 51/5
reach [5] 65/6 101/6 101/7 101/8 101/19
reacted [1] 113/9
reaction [3] 24/25 33/6 46/4
reactive [2] 17/1 18/6
read [12] 9/13 9/16 9/23 13/10 13/17 13/19 13/22 14/7 36/12 89/8 89/9 89/17
reading [2] 34/13 34/16
ready [1] 9/15
real [1] 58/2
reality [3] 48/20 48/21 120/1
realized [3] 89/4 89/5 89/7
really [18] 4/14 20/25 23/23 29/8 34/15 36/13 37/25 53/18 53/25 57/12 58/10 81/25 93/6 102/16 105/18 106/14 116/19 121/17
Realtime [1] 2/15
reason [10] 8/1 31/12 35/14 53/3 67/6 70/5 77/6 80/18 80/20 82/5
reasonable [7] 20/4 67/10 68/2 69/20 125/1 125/4 125/4
reasonably [9] 22/23 23/17 24/3 65/18 68/5 69/6 69/7 73/18 74/17
reasons [10] 38/21 52/22 53/5 60/11 68/6 68/11 70/16 75/12 80/17 122/2
reassigning [1] 27/1
rebellion [1] 112/16
recall [5] 9/25 19/22 19/25 45/14 67/24
receive [2] 4/6 80/18
received [3] 9/12 12/12 14/7
receiving [1] 8/21
recently [3] 8/25 87/15 119/11
recess [5] 63/15 63/16 108/25 109/1 127/10
recessed [1] 5/21
recitation [2] 52/23 89/11
recitations [1] 16/15
recite [2] 13/9 64/7
recited [2] 20/10 64/6
reciting [1] 20/23
recognizes [1] 5/12
recollection [2] 42/23 47/9
recommendation [1] 13/12
recommended [2] 3/21 122/13
reconcile [1] 67/15
reconciled [1] 108/10
record [15] 13/9 15/3 25/24 28/19 43/7 55/10 55/22 56/15 63/22 64/8 64/14 95/9 99/9 99/12 128/3
recorded [1] 2/19
recording [2] 17/13 119/3
recourse [1] 16/1
recruited [1] 30/17
rectified [1] 28/14
rectify [2] 27/20 28/1
redirect [2] 44/11 45/1
redress [1] 120/8
reduction [3] 80/14 80/19 80/22
refer [1] 32/14
reference [1] 4/6
referred [1] 77/21
referring [1] 117/9
Reffitt [1] 92/18
reflect [6] 15/5 63/4 64/8 109/18 110/13 111/1
reflected [1] 117/21
reflection [1] 119/22
refrain [1] 122/19
Refuse [1] 97/11
Refuse Fascism [1] 97/11
refute [1] 16/15
regarding [13] 41/6 41/12 41/15 41/16 42/4 42/15 42/23 44/15 46/19 46/20 58/20 59/9 59/11
regards [2] 56/16 58/3
regime [4] 88/13 106/19 106/21 108/18
regional [2] 32/8 32/21
Registered [1] 2/15
regret [5] 17/16 72/24 73/3 73/4 119/4
regrettably [1] 116/22
rehabilitation [1] 87/6
reinforcements [1] 54/14
reiterate [1] 55/21
related [4] 5/25 22/6 22/10 85/22
relates [1] 11/6
relationship [4] 34/22 35/2 70/17 77/23
relative [1] 113/23
relax [1] 10/11
relaxed [1] 8/3
release [4] 95/20 122/8 125/18 126/8
released [1] 120/3
relevant [7] 22/15 22/15 23/1 23/2 23/10 23/19 38/11
relied [1] 49/13
relief [1] 95/11
religious [1] 124/4
remains [1] 114/24
remarkable [1] 71/8
remedy [1] 107/5
remember [6] 4/21 11/11 42/21 45/20 46/23 76/10
remind [1] 26/13
removed [1] 17/20
rending [1] 104/4
repairs [1] 10/23
repeated [2] 39/9 98/15
repeatedly [3] 36/8 85/4 120/18
reply [3] 27/10 29/16 100/25
report [12] 12/15 12/18 13/11 13/16 14/8 15/5 55/10 122/15 123/15 124/6 126/9 126/13
reported [4] 30/10

R

reported... [3] 30/13 30/14 51/13
Reporter [4] 2/14 2/15 2/15 2/16
represented [1] 73/24
Republic [1] 118/2
request [3] 58/17 81/20 126/19
requested [7] 11/13 60/16 78/4 80/14 81/2 86/17 125/17
requesting [1] 10/1
require [4] 9/2 38/7 79/7 79/17
required [5] 7/11 7/11 59/17 65/7 66/6
requires [4] 4/2 59/4 78/9 79/19
resembling [1] 120/19
reserve [2] 60/1 60/11
reserved [1] 95/16
residence [2] 125/21 126/11
resist [2] 65/1 68/10
resistance [2] 17/16 21/18
resisting [1] 65/23
resolve [2] 11/19 120/7
resolved [1] 11/25
resolves [2] 9/9 12/3
resources [4] 26/15 27/1 27/3 27/19
respect [19] 9/11 10/16 10/25 12/17 13/10 24/19 25/16 33/14 34/10 42/12 46/2 46/11 47/3 67/12 73/21 86/19 109/19 110/23 111/2
respectfully [5] 43/16 46/17 51/5 59/13 59/20
respond [4] 9/15 9/17 14/20 99/19
responded [1] 52/18
responds [1] 16/2
response [7] 28/4 28/5 41/8 41/14 47/6 94/5 94/6
responsibility [7] 33/20 34/1 34/6 66/20 80/15 81/1 118/17
responsible [9] 10/3 10/12 10/19 11/8 11/9 22/21 63/24 74/12 74/15
rest [1] 121/23
restate [1] 109/8
restitution [9] 4/23 9/22 10/1 10/20 10/25 11/18 11/21 123/1 125/24
restriction [1] 79/5
result [2] 36/3 67/8
resulted [5] 3/25 4/11 23/3 26/10 76/7
resulted-in [1] 4/11
resulting [1] 25/17
results [3] 7/24 84/24 87/2
retain [1] 125/22
retaliate [2] 36/25 78/15
retaliation [1] 37/9
retaliatory [1] 37/4
retired [3] 98/10 99/3 102/8
return [1] 126/12
review [3] 9/13 14/7 14/12
reviewed [5] 12/12 12/14 13/10 13/21 13/22
revolution [5] 16/11 18/12 65/22 85/8 114/6
revolution/Civil War [1] 16/11
rhetoric [4] 91/23 96/5 96/6 118/19
RHODES [191]
Rhodes 3 [1] 87/14
Rhodes 6 [1] 87/13
Rhodes' [33] 11/23 18/22 19/11 19/22 20/5 20/9 20/20 21/9 21/12 21/22 25/7 26/18 32/1 32/3 32/20 36/6 37/5 38/10 42/14 42/19 44/25 45/5 45/13 46/4 65/10 66/20 71/12 80/23 85/11 85/14 86/7 86/21 88/14
ridiculous [1] 104/21
rifles [4] 17/10 17/17 17/21 18/11
right [41] 3/14 7/9 12/3 12/9 14/5 14/14 15/23 17/18 17/20 17/22 22/4 28/11 36/14 37/13 39/21 40/25 46/11 52/1 60/16 63/12 69/2 69/19 75/7 88/9 92/1 93/13 96/22 100/12 102/12 105/24 106/20 108/20 108/23 113/21 114/12 120/15 120/25 121/6 121/13 126/15 126/22
right-wing [2] 92/1 113/21
rightfully [1] 28/9
rightly [2] 110/2 116/5
rigorous [1] 112/20
rings [1] 77/18
riot [2] 26/4 102/14
rioters [3] 84/25 91/17 91/17
rise [4] 63/14 108/24 109/2 127/9
risk [1] 119/23
river [3] 39/6 74/3 78/24
RMR [2] 128/2 128/8
road [1] 86/9
robbery [1] 93/6
Roberto [1] 77/21
Roberto Minuta [1] 77/21
Roberts [1] 15/25
Roger [2] 103/1 103/2
Roger Stone [2] 103/1 103/2
rogue [2] 51/21 51/23
role [22] 8/9 25/7 29/7 29/17 29/18 29/21 31/4 31/8 31/17 31/18 33/23 33/23 34/11 41/13 46/19 50/8 57/18 69/23 83/9 84/17 86/14 88/19
roll [1] 6/8
room [1] 48/23
Rotunda [1] 72/11
roughly [3] 26/21 40/3 49/20
row [1] 105/20
Rubenacker [1] 25/25
rule [7] 6/3 13/1 15/12 24/14 64/7 84/5 86/19
Rule 29 [3] 15/12 24/14 64/7
ruled [1] 73/22
rules [1] 107/20
rulings [1] 65/8
run [1] 122/9
running [2] 33/9 86/21
runs [1] 93/11

S

safe [1] 68/16
saga [1] 47/14
said [76] 4/4 6/17 9/1 9/5 9/14 10/10 19/8 19/24 20/16 20/18 21/18 21/21 29/1 41/23 41/24 42/2 44/14 45/1 45/2 45/4 45/11 46/4 47/6 47/9 48/11 48/12 48/24 50/23 53/2 54/20 55/15 55/19 55/21 57/8 64/13 64/18 67/18 67/20 67/21 67/23 68/16 69/6 70/1 70/19 70/25 71/1 71/2 71/17 71/24 72/15 72/15 72/21 73/7 74/16 75/6 75/17 77/3 78/6 81/16 88/11 91/13 100/10 101/14 101/22 101/23 102/21 111/14 114/15 117/15 117/22 117/24 118/24 119/11 119/23 120/12 121/16
Saint [1] 48/12
Saint Augustine [1] 48/12
Salke [1] 74/20
salty [1] 45/4
Sam [1] 87/12
same [10] 19/16 41/11 82/14 82/22 97/7 100/7 105/14 105/15 106/17 112/10
Sandra [1] 47/23
Sandra Parker's [1] 47/23
sane [1] 119/18
sat [3] 14/22 88/7 89/16
save [1] 85/19
saw [8] 23/13 71/19 85/4 90/1 98/23 102/13 102/15 114/25
say [35] 5/17 6/13 6/23 9/2 13/22 16/16 20/25 27/18 27/23 35/6 37/19 38/7 40/15 42/17 44/16 47/2 48/18 57/13 59/16 59/20 64/1 65/9 67/14 68/4 71/22 79/15 81/14 86/24 106/13 106/20 106/23 107/14 108/16 110/8 115/17
saying [5] 59/3 90/22 96/18 97/21 106/18
says [11] 5/6 8/18 15/24 16/7 17/6 17/14 17/24 33/7 108/4 108/4 108/5
scared [1] 90/3
scars [1] 104/5
scenario [1] 16/1
scheme [1] 82/17
school [3] 115/23 115/24 116/1
Schwartz [1] 92/11
scold [1] 71/20
scolded [1] 71/22
scope [20] 12/21 22/6 22/10 22/22 23/10 23/12 23/24 29/6 56/17 56/22 57/3 57/6 57/11 64/21 65/16 74/16 76/9 76/12 76/14 83/7
score [1] 38/19
scream [1] 99/16
screamed [1] 98/22
script [1] 105/8
search [2] 124/25 125/3
searches [3] 124/11 124/16 124/23
searching [1] 85/23
seated [2] 63/19 109/5
second [5] 18/16 25/4 31/2 65/6 70/24
Secret [3] 28/20 76/3 98/1
section [10] 8/21 14/20 22/15 22/19 23/1 33/17 33/18 38/20 41/15 100/23
Section 1B1.3 [3] 22/15 22/19 23/1
Section 3B1.1 [1] 33/18
secured [1] 99/12
security [7] 52/25 93/8 99/21 100/7 100/18 100/19 119/7
sedition [4] 94/14 110/14 113/7 114/17
seditious [23] 21/13 24/22 26/20 31/14 35/23 59/24 64/3 73/24 76/1 78/7 82/8 84/17 85/4 86/15 87/21 94/16 97/19 97/20 110/11 110/18 111/6 112/13 113/1
see [16] 13/2 30/19 31/1 36/1 40/11 48/6 48/8 48/14 49/21 52/15 84/9 89/13 102/12 102/13 102/16 102/16
seek [4] 87/9 99/14 99/15 123/17
seeking [2] 66/25 86/14
seem [1] 37/17
seemed [2] 47/14 59/22
seems [6] 27/17 27/23 37/20 58/14 69/15 80/2
seen [2] 114/24 116/11
self [1] 119/22
self-reflection [1] 119/22
selfies [1] 105/13
Senate [6] 60/24 74/25 75/3 100/16 100/17 103/18
send [1] 54/12
sense [11] 4/14 6/16 14/15 22/10 30/22 35/2 68/3 71/10 101/1 111/3 118/15
sentence [32] 13/5 38/19 38/22 40/18 83/21 83/22 83/25 86/16 86/24 87/4 88/22 89/3 90/5 90/10 90/11 90/11 93/11 93/21 95/14 95/15 95/19 96/2 96/3 109/12 109/17 110/13 110/25 111/1 126/11 126/16 126/24 127/2
sentence-wise [1] 90/11
sentenced [7] 87/20 92/7 92/9 92/11 94/16 117/25 122/7
sentences [3] 92/4 110/3 110/14
sentencing [28] 1/9 3/16 7/13 11/24 12/1 13/13 13/15 26/1 35/17 37/21 40/5 44/1 49/12 82/24 84/8 84/13 84/14 85/10 87/6 87/13 88/4 88/15 93/12 94/5 94/7 104/11 109/14 122/14
Sentencing Commission [2] 7/13 37/21
sentencings [1] 13/7
separate [5] 50/11 79/14 79/14 82/22 119/21
series [1] 113/9
serious [6] 79/14 90/4 110/4 110/5 110/6

S

serious... [1] 113/2
seriousness [3] 109/18 111/2 112/12
serve [2] 115/23 122/7
served [1] 81/11
service [7] 28/20 76/3 81/4 81/5 95/10 98/1 116/6
services [3] 123/23 125/6 125/9
serving [1] 99/4
session [2] 63/17 109/3
set [9] 7/8 41/20 61/1 61/11 75/12 105/9 109/11 109/14 109/25
settled [2] 21/14 21/16
Seventh [1] 27/11
several [2] 32/1 56/22
shaking [1] 50/12
shall [10] 107/23 122/11 124/16 125/8 125/11 125/24 126/1 126/5 126/12 126/17
Shaman [1] 90/8
shame [1] 113/18
share [2] 66/2 125/19
shared [2] 18/17 118/21
sharing [1] 11/17
she [5] 103/17 103/18 106/18 106/19 106/20
she's [1] 30/20
sheep [2] 117/13 117/13
shit [1] 17/8
shooting [1] 99/10
short [1] 19/20
shortly [1] 106/10
should [28] 7/14 7/17 9/23 12/21 13/21 16/4 16/16 17/17 17/21 39/16 41/24 59/8 59/12 59/25 59/25 64/8 88/21 89/3 93/10 94/9 104/22 107/18 109/23 114/4 115/12 116/14 119/4 120/10
shouldn't [2] 98/12 116/9
shoved [1] 103/23
show [2] 6/24 17/8
showed [14] 15/8 15/12 16/17 17/14 17/15 47/23 65/20 66/1 66/4 66/8 69/25 72/24 90/14 91/16
showing [2] 17/25 78/9
shown [2] 91/14 91/19
shows [3] 43/19 64/19 76/22
shut [3] 67/5 96/25 98/18
sic [4] 37/19 54/15 81/21 115/24
sick [1] 102/7
side [9] 19/6 19/9 19/9 102/14 117/9
sides [1] 89/18
Siekerman [4] 32/10 32/14 32/18 77/24
sign [1] 17/9
Signal [4] 20/21 65/25 66/3 72/25
significance [1] 39/25
significant [4] 79/25 83/20 86/16 87/4
similar [5] 29/1 31/1 40/8 49/2 94/25
simple [2] 11/13 90/22
simply [10] 17/24 18/6 19/24 20/23 62/14 63/3 73/8 76/14 99/15 108/2
since [5] 9/5 80/24 80/24 80/25 112/24
singing [1] 50/15
single [1] 72/21
sir [5] 14/12 106/8 108/19 117/25 127/5
sis [1] 15/23
sisters [1] 104/13
sit [2] 49/13 120/1
sites [1] 123/23
sitting [2] 34/15 114/13
situation [3] 10/16 33/8 120/19
situations [1] 35/4
six [12] 27/4 38/24 39/2 39/21 40/3 54/13 78/4 79/11 80/2 80/8 83/11 115/18
six-level [4] 38/24 39/21 78/4 80/8
Skype [1] 125/12
slam [1] 104/1
slight [1] 49/3
slightly [3] 8/3 25/22 109/24
small [1] 49/17
smart [4] 50/19 73/13 118/3 124/15
smarter [1] 90/24
smear [1] 105/5
smeared [1] 106/6
Smith [2] 8/20 15/20
SMS [1] 123/24
snippets [1] 49/17
so [143]
so I think [8] 7/8 7/23 12/3 28/12 29/9 35/21 37/25 78/2
So this is [1] 40/9
social [6] 123/19 123/20 123/21 123/23 123/23 124/3
SOCs [1] 24/2
software [5] 124/14 124/18 124/19 124/21 125/12
soldier [1] 31/20
soldiers [2] 94/23 110/21
sole [1] 80/18
Solzhenitsyn [1] 108/21
some [65] 3/21 3/25 4/2 4/4 5/4 5/12 8/22 9/15 9/24 10/13 12/18 15/4 20/10 21/21 23/7 25/6 25/6 25/22 29/13 29/13 29/15 30/25 31/5 31/11 32/23 33/22 33/25 34/20 35/1 35/14 36/5 37/22 40/13 40/17 40/19 41/11 52/24 52/24 53/5 54/14 55/6 56/4 56/6 64/18 67/17 71/10 72/19 77/16 80/8 89/19 90/19 90/20 91/22 92/4 92/8 92/25 99/4 102/15 110/19 111/3 115/19 115/19 116/5 116/16 119/17
somebody [19] 13/18 15/25 23/22 24/21 26/4 29/7 30/19 31/20 35/4 51/2 51/20 70/20 70/21 72/13 72/14 72/14 80/18 80/22 113/19
somehow [4] 7/17 75/22 105/5 108/14
someone [9] 24/24 36/7 39/23 72/3 93/5 93/11 103/23 104/11 104/11
something [15] 20/16 24/3 26/24 27/8 39/14 39/20 40/7 42/16 45/16 45/17 45/18 47/15 50/25 51/14 81/16
somewhat [2] 36/9 44/17
somewhere [1] 96/7
soon [3] 47/20 71/8 80/23
sooner [1] 11/23
sophomoric [1] 89/14
SoRelle [5] 15/21 17/7 20/24 21/4 51/23
sorry [4] 4/20 74/11 78/12 78/12
sort [17] 4/2 4/3 4/23 5/1 5/19 15/7 29/19 30/6 31/6 33/2 34/1 35/1 37/4 38/18 39/3 47/6 80/8
sound [1] 119/6
south [5] 19/6 19/8 19/9 68/17 100/19
South Carolina [1] 100/19
Southern [1] 99/7
speak [8] 38/22 42/11 50/7 52/25 96/15 101/4 111/4 120/2
speaker [3] 74/10 90/19 103/3
Speaker's [1] 75/8
speakers [1] 53/1
speaks [2] 51/19 59/9
special [4] 28/19 80/19 122/10 123/4
specialize [1] 125/13
specific [10] 9/11 22/11 23/16 25/11 25/16 30/8 58/10 82/19 87/5 115/15
specifically [5] 10/18 46/20 65/19 69/11 78/21
specified [1] 81/25
spectrum [1] 88/17
speculate [1] 45/25
speech [13] 21/9 21/10 21/13 21/14 21/14 21/16 96/21 96/22 96/22 97/1 100/13 100/17 117/7
spend [1] 108/16
spirit [1] 17/15
spoken [1] 100/14
sponte [1] 51/9
spray [1] 99/11
sprayed [1] 103/12
spraying [1] 99/10
spun [1] 92/2
squarely [3] 36/22 78/16 83/23
stabbed [1] 100/4
stabs [1] 100/4
stack [4] 24/16 24/16 50/3 76/21
Stack 1 [1] 24/16
Stack 2 [1] 24/16
staff [2] 74/10 75/10
stage [1] 100/15
stamina [1] 115/8
stance [1] 42/14
stand [11] 58/18 59/10 60/4 63/14 66/10 85/21 89/2 99/18 101/10 114/14 114/14
standard [11] 7/4 8/2 8/4 10/8 10/11 11/6 21/12 25/20 25/21 26/3 76/6
standards [2] 6/19 6/25
standing [7] 43/4 45/21 49/20 52/16 72/13 98/18 100/21
standoffs [1] 117/5
stands [4] 64/3 87/20 108/25 127/10
start [7] 5/1 50/1 50/15 50/22 61/12 96/18 112/14
started [10] 35/8 56/21 91/4 91/4 91/5 91/5 91/24 96/5 96/7 97/2
starting [2] 39/15 98/16
starts [1] 11/24
state [7] 31/18 32/8 63/22 107/22 107/23 108/1 122/18
stated [3] 32/3 101/20 120/18
statement [5] 6/5 20/18 89/21 108/21
statements [3] 18/11 32/2 87/13
states [27] 1/1 1/3 1/10 3/3 4/7 4/20 20/7 27/9 28/20 32/6 35/7 35/24 65/1 74/6 81/8 82/11 84/6 85/9 87/19 94/17 107/19 109/11 111/15 113/12 117/1 123/11 125/19
statute [6] 7/6 11/19 109/14 109/25 112/24 127/1
statutes [1] 112/22
statutorily [1] 37/24
stay [4] 31/9 68/14 68/15 99/18
stayed [1] 100/19
Steal [3] 90/17 91/5 91/10
stenography [1] 2/19
step [5] 43/2 49/20 89/25 98/16 102/12
stepped [3] 98/8 98/23 102/20
steps [14] 15/22 19/9 19/13 19/13 25/4 43/3 43/22 50/20 51/23 63/21 72/13 121/11 121/14 121/18
STEWART [12] 1/6 2/2 3/4 15/21 30/14 56/7 70/7 70/15 70/20 72/15 73/12 116/21
Stewart Rhodes [6] 30/14 70/7 70/15 70/20 73/12 116/21
still [18] 33/19 34/4 40/10 40/18 42/4 42/11 43/6 44/16 44/17 46/2 46/12 60/6 91/15 93/18 101/17 104/5 121/16 125/22
stockpiling [1] 78/23
stolen [2] 88/7 119/12
stone [3] 41/20 103/1 103/2
stood [1] 100/11
stop [28] 24/23 35/23 39/25 46/8 52/17 53/10 53/11 53/18 53/22 54/4 57/24 58/23 61/20 62/12 68/7 71/2 71/3 87/21 88/11 88/12 88/13 90/17 91/5 91/10 97/21 106/18 108/11 119/16
stopped [6] 61/9 62/2 62/10 88/11 105/25 106/19
stopping [3] 36/20 61/24 84/2
stops [1] 106/19
storm [1] 43/13
street [3] 1/17 2/11 99/15
street-fight [1] 99/15

S

streets [3] 97/8 105/25 118/13
strict [4] 6/16 7/4 7/10 30/6
strictly [2] 7/25 112/19
strike [1] 103/25
stringent [1] 5/9
strokes [1] 64/19
strong [1] 24/13
stronger [1] 37/6
structure [3] 13/6 31/11 70/2
struggling [1] 48/5
stuff [1] 56/5
stun [1] 103/12
stupid [7] 44/14 45/6 45/24 47/7 71/15 73/1 101/23
stupid,' [1] 71/23
stupid.' [1] 72/16
sua [1] 51/9
sua sponte [1] 51/9
subject [5] 47/3 112/24 124/12 124/23 126/25
submit [2] 62/14 122/21
submitted [4] 13/18 87/12 87/15 87/23
subordinate [1] 30/13
subordinates [1] 34/23
substance [2] 122/19 122/20
substances [1] 100/2
substantial [16] 3/24 25/17 26/10 26/11 27/6 27/14 29/4 41/13 42/4 55/15 56/11 75/16 75/19 75/25 76/7 83/5
substantive [1] 112/6
success [1] 85/11
successfully [1] 111/20
such [17] 7/6 19/25 22/20 32/13 33/16 38/13 74/5 94/24 107/24 118/24 122/8 124/2 124/5 125/7 125/12 126/6 126/6
sudden [2] 50/1 51/4
sue [1] 104/22
sued [1] 107/16
suffer [1] 84/12
suffices [1] 76/6
sufficient [7] 5/14 5/20 6/7 6/15 7/16 60/8 109/12
suggest [11] 5/18 7/22 16/14 39/20 43/16 46/12 46/17 51/5 56/11 59/13 72/19
suggesting [4] 72/23 77/22 78/1 118/18
suggestion [3] 46/7 49/10 57/23
suggests [3] 5/24 39/12 87/8
suite [3] 2/4 2/8 75/8
suites [1] 75/12
sum [1] 112/5
summa [1] 115/21
summa cum laude [1] 115/21
summary [2] 65/9 110/2
Sunday [1] 88/3
sunlight [1] 107/4
superior [2] 34/22 35/3
supervise [1] 33/16
supervised [2] 95/20 122/8
supervision [7] 35/1 35/5 122/11 122/16 122/22 125/2 125/20
support [10] 13/23 16/15 25/1 26/20 32/19 34/20 40/13 64/6 66/24 82/3
supported [6] 28/6 38/1 38/2 112/16 113/19 114/11
supporter [2] 98/20 98/21
supporters [7] 97/1 97/8 97/18 97/25 98/11 102/18 108/12
supports [3] 24/2 40/3 71/10
suppose [2] 28/4 81/16
supposed [2] 82/21 103/2
suppression [1] 88/10
supremacists [1] 104/20
supreme [7] 4/19 4/23 81/7 86/23 107/17 111/14 116/2
Supreme Court [5] 4/23 81/7 107/17 111/14 116/2
Supreme Court's [1] 4/19
sure [7] 4/13 4/17 25/13 48/19 63/7 72/8 101/13
surmise [1] 31/16
surmising [1] 53/15
surprise [1] 69/22
surreal [1] 104/14
survival [1] 86/20
suspect [1] 67/15
suspicion [1] 125/1
sworn [6] 16/3 16/6 44/13 49/11 62/6 97/13
sympathetic [1] 104/3
system [3] 87/3 88/21 119/21
systemic [2] 96/24 98/15
systems [1] 125/9

T

tablets [1] 125/14
take [23] 18/1 37/5 43/8 50/11 52/17 54/6 63/12 66/9 76/13 88/13 89/23 102/5 106/19 106/23 108/22 109/24 113/1 114/5 118/9 120/4 121/8 121/11 121/14
taken [11] 43/2 43/2 53/15 54/3 62/3 62/6 74/16 81/21 81/24 106/5 110/7
taking [5] 15/19 15/23 21/23 66/6 103/19
Taliban [1] 94/23
talk [6] 35/16 46/18 51/18 80/23 90/2 115/6
talked [20] 30/1 30/9 32/4 32/10 32/12 42/17 43/25 48/7 50/2 52/9 54/16 54/22 54/25 67/13 69/10 85/10 94/8 94/12 106/13 107/2
talked about [1] 94/12
talking [9] 6/12 8/5 33/4 37/23 50/15 72/6 72/7 74/23 106/22
talks [2] 93/11 94/14
tantamount [1] 82/10
target [1] 106/3
targeting [3] 79/18 79/22 110/19
Tarpley [3] 2/10 3/9 60/14
task [1] 101/17
tasks [1] 41/11
teach [1] 99/20
teaches [1] 6/18
team [14] 30/10 31/4 32/16 32/16 32/21 33/5 33/24 41/10 42/11 96/12 100/19 101/2 101/18 103/1
teams [3] 70/4 101/25 102/25
TeamSpeak [1] 125/13
telecommunications [1] 125/11
tell [12] 17/17 20/22 30/1 37/16 44/12 49/14 68/14 68/14 71/24 85/22 93/18 99/25
telling [1] 73/8
temper [1] 103/22
ten [2] 58/20 110/5
tendencies [1] 93/2
tens [1] 91/18
term [3] 3/25 7/23 51/21
termination [1] 126/14
terms [19] 4/1 11/2 21/5 29/1 34/19 40/4 41/14 51/18 60/1 71/16 76/2 76/2 76/15 76/19 79/3 111/13 116/12 122/4 122/8
terribly [1] 4/13
terror [1] 88/10
terrorism [17] 35/20 36/1 37/24 38/13 38/25 39/19 39/22 41/16 58/7 58/24 59/9 79/14 79/18 79/19 83/11 84/4
terrorist [2] 123/6 123/14
terrorists [1] 108/13
test [4] 7/1 7/10 21/1 122/21
testified [9] 16/25 17/2 18/17 30/12 30/17 44/3 44/23 45/21 86/1
testify [2] 45/3 46/10
testifying [1] 49/10
testimony [35] 17/25 18/15 19/18 19/21 19/22 28/19 43/18 43/24 44/3 44/6 44/10 44/13 44/15 44/24 45/3 45/6 45/7 45/13 45/14 46/23 49/12 52/20 61/4 61/8 61/15 67/24 69/22 70/18 71/13 71/18 72/9 77/15 103/17 104/3 104/4
tests [3] 5/23 6/14 122/22
Texas [4] 91/12 98/4 98/6 107/16
text [7] 7/6 7/20 15/20 16/12 20/20 61/18 108/7
than [25] 7/1 11/23 26/20 38/3 44/16 47/1 60/8 78/10 78/12 79/6 79/15 90/24 93/11 95/15 105/17 107/13 109/13 109/25 111/18 111/25 112/22 115/7 115/10 117/4 120/24
thank [27] 14/13 22/8 40/23 40/24 58/11 58/12 58/15 60/12 60/21 63/10 63/11 63/13 63/20 83/19 88/23 88/24 89/1 95/24 96/8 96/9 106/11 108/19 108/20 108/23 109/4 127/6 127/7
thank you [18] 22/8 40/23 40/24 58/11 58/12 58/15 60/12 63/13 83/19 88/23 88/24 89/1 95/24 96/8 96/9 108/19 108/20 109/4
that [868]
that they [1] 94/9
that'll [1] 13/6
that's [63] 5/16 6/12 6/21 11/7 13/19 14/1 17/11 22/3 28/25 33/11 35/8 35/14 40/15 40/22 42/13 42/16 44/14 44/17 45/17 45/18 45/19 45/23 47/18 47/19 48/1 50/25 51/1 54/7 57/10 58/6 59/7 62/19 62/24 67/18 68/1 68/16 69/2 70/12 77/5 79/24 79/25 83/16 93/16 94/18 98/8 99/6 100/23 101/9 101/14 103/6 106/22 107/5 108/1 113/7 113/17 114/6 115/4 116/10 116/18 118/4 120/16 126/16 126/24
theft [1] 88/7
their [39] 6/1 16/25 20/22 31/9 32/16 32/17 46/1 49/12 57/15 62/16 66/9 66/17 67/4 69/18 74/4 74/8 74/22 76/7 79/2 85/24 86/4 86/6 86/9 93/8 93/11 95/6 98/12 105/25 107/18 111/22 115/5 115/7 115/8 115/8 115/8 115/9 118/9 118/17 124/23
thelinderfirm.com [1] 2/6
them [65] 6/3 6/3 11/2 14/21 14/22 20/10 25/6 30/18 49/21 50/4 50/10 50/17 56/2 56/3 60/24 68/14 68/15 69/1 73/9 75/9 77/14 78/18 78/19 80/1 86/6 86/8 90/19 90/20 92/21 94/9 94/23 97/6 97/15 97/19 98/23 99/5 99/16 99/22 99/22 99/23 99/25 100/6 101/1 101/3 101/10 101/12 101/19 102/11 102/23 103/4 103/11 103/12 103/12 105/6 105/19 107/10 110/19 113/2 116/23 117/1 117/20 118/7 118/7 118/8 118/9
them to [1] 73/9
theme [1] 86/21
themselves [7] 6/9 35/15 111/4 115/3 118/8 119/21 120/20
then [62] 7/17 11/7 12/16 12/19 13/1 13/3 13/5 15/3 16/10 17/18 17/21 17/22 25/2 25/25 27/24 29/5 30/17 32/8 32/12 32/21 32/21 36/7 41/7 41/9 41/14 41/23 42/2 43/1 43/22 44/6 44/16 45/20 49/11 49/13 49/25 50/14 50/17 50/22 51/15 54/8 57/2 57/10 58/2 63/25 71/1 71/12 71/24 72/17 73/6 75/6 75/18 76/18 78/25 93/6 102/7 103/24 105/22 114/5 116/3 119/21 120/23 121/24
then-Chief Judge Howell [1] 25/25
then-Guidelines [1]

T

then-Guidelines... [1] 63/25
theologian [1] 48/10
theologians [1] 48/7
theory [8] 10/18 26/6 54/3 57/13 57/14 57/15 61/23 108/2
there [141]
there's [36] 7/20 7/21 17/12 17/25 18/10 20/20 28/24 31/12 36/25 39/3 47/13 48/20 49/3 50/15 52/14 55/25 58/2 58/24 61/10 61/12 62/9 69/14 71/12 72/19 76/14 80/16 81/20 89/20 89/21 92/7 92/25 94/3 94/3 99/9 115/6 117/3
thereafter [1] 122/22
therefore [4] 8/6 20/17 73/16 98/1
thereof [1] 107/24
these [38] 3/12 6/13 13/7 14/15 16/13 16/14 23/12 23/14 23/16 27/2 29/20 31/14 32/19 33/14 35/13 57/12 74/15 82/22 84/11 86/2 86/4 86/5 86/11 86/22 88/14 93/2 94/2 94/7 94/11 94/20 94/25 99/8 110/18 112/23 116/5 124/8 124/16 124/22
they [138]
they'd [2] 16/3 101/21
They'll [1] 99/17
they're [13] 36/14 49/2 49/3 50/11 50/12 51/4 52/15 57/16 88/8 93/18 97/21 108/14 113/20
They've [1] 116/17
thing [24] 17/18 17/19 17/20 48/24 51/4 52/7 52/9 56/25 58/10 60/15 62/18 93/13 94/24 102/12 103/16 103/20 105/15 106/20 107/2 107/5 107/14 113/16 118/22 119/2
things [18] 31/1 43/10 45/5 48/14 57/13 58/22 61/7 68/13 80/12 80/13 89/4 91/11 93/3 94/25 95/11 99/17 107/6 110/12
think [138]
think he [1] 73/8
thinking [6] 33/14 38/17 39/18 89/2 89/19 110/24
third [4] 18/16 30/15 48/10 71/1
thirds [1] 44/20
this [206]
This is [1] 3/3
Thomas [1] 92/15
Thompson [1] 104/7
thorough [2] 14/1 44/1
those [68] 3/22 4/16 7/8 10/25 11/4 11/6 16/23 18/21 22/16 25/4 34/2 36/12 39/19 40/2 41/8 49/23 64/7 64/9 64/10 64/14 65/15 66/17 66/19 66/21 67/1 70/11 72/20 72/25 73/10 74/14 75/9 75/12 76/22 77/1 80/9 84/11 85/17 85/17 87/25 88/8 88/9 90/18 90/20 91/11 91/17 91/17 91/18 92/20 93/21 96/20 104/9 110/5 110/9 110/10 110/16 111/4 111/8 111/12 111/25 112/16 113/1 114/6 114/7 114/7 114/7 115/7 116/12 122/2
though [8] 27/17 35/16 37/20 44/22 93/1 97/20 104/10 106/13
thought [9] 4/4 21/3 39/1 62/18 70/20 70/22 110/18 117/18 119/1
thoughts [2] 11/17 40/17
thousands [3] 68/21 91/18 105/14
thread [1] 32/5
threat [6] 28/10 39/24 73/25 88/20 111/18 118/1
threaten [1] 84/5
threatened [6] 25/8 74/7 74/9 74/19 75/9 84/5
threatening [3] 24/20 74/13 83/2
three [24] 3/23 6/6 6/8 7/18 8/6 8/10 14/22 19/23 27/4 29/6 34/12 44/19 49/9 54/20 55/13 71/8 75/15 80/13 83/6 89/8 90/14 94/7 95/20 95/22
three-level [4] 3/23 7/18 8/6 75/15
three-person [1] 44/19
three-point [1] 55/13
three-way [2] 19/23 71/8
threw [1] 103/11
through [23] 11/10 12/18 14/22 19/16 21/24 27/13 30/10 37/7 39/1 50/24 55/7 57/12 74/21 78/21 78/22 86/21 86/24 89/8 89/16 94/13 98/1 119/16 120/17
throughout [6] 26/25 88/17 96/23 97/23 98/15 106/16
throw [3] 99/17 99/25
thus [2] 41/23 41/24
tie [1] 105/6
tier [1] 102/17
time [32] 5/20 40/1 42/21 42/22 42/24 43/8 44/7 44/8 58/15 71/23 72/7 72/10 75/10 75/11 75/19 75/24 76/13 87/8 87/9 95/12 95/13 96/16 98/4 98/24 101/22 106/4 113/25 114/22 121/4 125/4 126/6 126/25
times [2] 44/2 105/19
Timimi [1] 94/20
timing [2] 47/22 71/7
tip [2] 6/7 6/10
tips [1] 6/6
titled [1] 128/4
today [12] 9/15 9/21 11/19 12/11 23/7 37/12 38/16 55/1 58/25 64/8 78/19 120/1
together [6] 32/6 32/16 40/2 102/22 105/1 113/2
told [9] 14/19 20/12 47/17 52/16 67/3 67/4 77/14 119/2 119/2
tone [1] 37/4
too [5] 27/18 31/13 34/16 71/25 118/18
took [9] 21/19 28/23 31/3 44/21 85/21 102/7 103/8 105/13 116/22
tool [1] 112/18
top [8] 29/23 32/8 32/21 43/3 70/3 77/3 77/4 102/17
Tor [1] 125/8
tort [2] 5/24 6/18
total [4] 10/3 11/11 83/13 122/10
touch [1] 99/2
tougher [1] 5/17
toward [2] 112/2 117/23
tracks [1] 67/1
Trade [1] 94/22
tradition [2] 7/2 7/6
tragedies [1] 84/9
trail [2] 67/20 67/21
trained [2] 117/10 117/12
training [1] 109/22
traitors [3] 16/5 16/11 86/6
transcript [5] 1/9 2/19 26/1 30/8 128/3
transcription [1] 2/19
transcripts [1] 27/5
transfer [21] 15/9 24/23 26/21 35/24 36/20 61/24 62/2 63/4 64/24 65/4 65/23 66/13 68/10 69/4 74/4 79/24 84/3 84/18 87/21 97/14 97/22
transferred [1] 125/21
transgender [1] 98/20
transitioned [1] 113/12
transportation [1] 76/16
transporting [1] 101/3
travel [1] 84/22
traveling [1] 110/20
treason [4] 82/8 94/16 112/17 112/23
treatise [1] 5/24
treatment [2] 126/12 126/14
trespass [2] 105/15 105/16
trial [19] 16/17 19/22 30/16 57/8 57/8 59/3 61/4 61/15 61/19 62/13 69/20 70/18 72/22 80/17 80/22 85/22 85/22 104/11 104/15
trials [6] 14/22 18/16 27/4 86/2 86/22 89/8
troops [1] 62/16
troubling [4] 42/25 49/8 59/2 59/7
Troy [2] 1/15 3/6
Troy Edwards [1] 3/6
truck [1] 98/6
true [12] 16/24 20/2 21/11 21/20 43/9 71/13 77/18 81/11 111/10 112/11 112/11 116/14
truly [1] 95/17
Trump [32] 17/3 17/18 18/4 37/3 51/2 53/12 56/25 57/25 66/10 92/1 96/19 96/23 97/1 97/8 97/12 97/18 97/23 97/25 97/25 98/9 98/11 98/15 98/20 98/21 100/15 102/18 104/18 104/25 106/21 106/25 108/12 108/14
Trump's [1] 97/2
trust [1] 102/11
trusted [1] 77/22
truth [3] 14/19 53/15 54/6
truthful [1] 49/12
try [5] 42/23 50/7 52/21 67/15 84/23
trying [11] 50/7 70/19 70/21 73/8 73/9 75/2 87/2 101/9 101/10 101/12 105/5
turmoil [1] 101/9
turn [5] 12/16 22/4 84/10 106/5 115/13
turned [4] 45/14 45/18 116/23 117/1
TV [2] 90/1 98/17
tweet [2] 51/3 57/1
twice [1] 86/18
two [37] 5/25 12/20 44/18 44/20 49/9 49/23 54/20 57/17 60/4 63/21 64/5 64/6 68/13 70/16 70/18 70/18 70/24 76/22 76/24 77/1 80/12 80/14 80/19 80/21 82/16 83/8 83/10 89/7 89/17 91/12 92/2 98/17 105/23 110/12 113/1 114/19 122/22
two-level [3] 57/17 80/14 80/21
two-point [1] 80/19
two-thirds [1] 44/20
TX [2] 2/4 2/8
type [1] 48/4
types [1] 10/8
typically [1] 5/2

U

U.S [5] 1/16 40/1 94/19 94/19 126/4
U.S. [8] 4/20 8/20 19/10 81/8 94/19 94/20 94/20 111/16
U.S. Capitol [1] 19/10
U.S. v [1] 94/20
U.S. v. Al-Timimi [1] 94/20
U.S. v. Rahman [1] 94/19
U.S. versus Smith [1] 8/20
U.S.C [1] 123/1
U.S.C. [1] 126/23
ubiquitous [1] 37/15
uglier [1] 115/9
ultimate [1] 24/10
ultimately [14] 9/12 15/3 26/10 42/6 43/11 43/21 43/22 71/1 77/15 80/10 82/6 101/25 118/20 118/21
unable [1] 126/18
unacceptable [1] 7/4
unannounced [1] 124/11
unarmed [4] 98/2 98/5 98/6 98/11
unbeknownst [2] 50/17 50/17
uncertainty [1] 67/18
unconscious [1] 98/7
unconstitutional [2] 108/2 119/13
under [38] 3/24 4/22 5/2 7/18 8/12 8/21 16/1 20/17 21/11 22/15 22/19 23/1 23/2 25/12 26/6 32/9 32/17 34/20 38/9 38/17 38/20 38/23 44/3 44/22 46/4 60/25 62/4 76/25 78/5 80/15 81/3 81/20 82/4 82/21 93/22 108/6 112/15 120/12
undercut [1] 43/9
undergraduate [1] 115/22
undermine [1] 7/5

U

underscore [1] 119/10
understand [9] 9/3 10/21 43/11 59/11 68/20 111/7 116/15 117/8 122/1
understanding [8] 17/2 18/17 29/12 34/14 47/19 59/6 66/5 66/12
understood [1] 67/8
undertaken [8] 22/20 22/22 23/5 23/15 24/4 63/23 64/21 65/16
undertaking [1] 12/21
undertook [1] 81/15
undisputed [1] 56/25
unfair [1] 23/22
unfortunately [4] 87/7 98/14 103/4 107/17
UNITED [25] 1/1 1/3 1/10 3/3 4/7 4/20 20/7 27/9 28/20 35/6 35/24 65/1 74/6 81/8 82/11 84/6 85/9 87/19 94/17 109/11 111/15 113/12 117/1 123/11 125/19
United States [17] 4/7 4/20 20/7 27/9 28/20 35/24 65/1 74/6 82/11 84/6 87/19 94/17 111/15 113/12 117/1 123/11 125/19
United States of [1] 3/3
University [1] 87/16
unknown [2] 123/6 123/7
unlawful [1] 122/20
unlawfully [1] 122/19
unless [2] 102/5 108/9
unlike [3] 10/16 99/7 99/14
UNLV [1] 115/21
unprecedented [1] 40/9
unprompted [1] 47/6
unrelated [2] 80/17 112/3
until [8] 17/9 55/1 56/24 56/25 61/13 88/11 106/18 126/6
untrained [1] 117/11
unusual [4] 14/15 81/6 81/12 81/17
unwarranted [2] 109/23 110/14
unwise [1] 89/18
up [48] 17/8 18/1 18/19 19/14 25/4 30/10 30/23 39/5 39/14 39/22 39/23 40/21 41/11 42/8 43/3 43/4 43/21 49/20 49/21 49/23 49/25 50/2 50/4 50/5 50/10 52/7 54/8 55/9 66/6 67/5 91/14 93/7 94/22 96/6 98/8 98/16 101/8 101/13 101/18 102/24 103/4 105/5 106/10 108/1 114/5 115/17 120/4 120/11
up in [1] 102/24
upon [16] 5/9 8/3 11/4 16/20 18/7 18/18 20/13 49/13 65/8 76/6 78/18 109/9 117/20 117/22 118/7 126/13
upset [1] 90/13
upward [2] 37/22 82/3
upwardly [2] 33/19 34/5
urge [1] 51/5
urine [1] 100/1
us [20] 11/14 17/9 29/5 29/10 45/25 48/21 53/19 58/16 83/17 88/16 99/1 99/17 99/18 99/19 101/16 102/22 104/20 106/5 106/6 121/23
usdoj.gov [2] 1/19 1/20
use [28] 11/15 16/8 16/23 18/13 18/19 18/19 24/23 35/25 36/8 65/23 66/19 69/3 69/10 71/14 74/5 78/25 84/1 99/12 113/4 113/10 122/20 123/18 124/4 124/22 125/5 125/6 125/8 125/11
used [13] 17/3 36/10 42/24 44/3 48/11 48/13 65/20 66/12 66/16 69/8 72/20 100/12 111/11
useful [1] 110/9
uses [1] 39/9
using [3] 82/22 96/21 117/5

V

v. [2] 94/19 94/20
vacuum [1] 26/19
Vallejo [3] 31/3 52/18 54/10
variation [1] 49/3
various [6] 8/11 10/7 10/7 22/11 27/13 27/14
vast [1] 26/15
vaunted [1] 50/3
vehicles [1] 98/12
verdicts [1] 67/15
version [1] 86/22
versus [10] 3/4 4/7 4/19 8/20 18/4 27/9 35/7 81/8 111/15 117/13
very [22] 24/7 30/22 36/1 36/18 36/22 44/1 56/24 58/13 63/13 70/10 83/20 89/11 89/12 92/14 97/7 97/21 98/24 103/6 104/3 106/1 118/2 127/7
veteran [2] 98/5 102/3
veterans [1] 98/10
via [3] 74/11 42/7 42/20
vice [1] 104/21
vicinity [2] 74/9 75/8
victim [5] 6/24 9/25 10/4 10/17 82/15
victims [4] 4/16 98/5 118/18 118/19
video [3] 47/22 47/23 49/17
videos [1] 102/15
view [16] 9/3 16/25 32/3 32/7 32/20 32/23 34/9 39/16 49/6 56/18 66/2 68/25 85/19 123/18 124/1 124/5
viewed [3] 6/1 8/2 10/3
views [1] 117/20
vigilantism [1] 87/1
vindicate [1] 6/20
violated [2] 105/4 107/22
violation [3] 87/25 125/1 125/3
violence [24] 18/22 20/14 21/10 21/10 21/24 65/23 66/5 66/19 84/1 86/18 87/10 87/23 96/25 97/17 98/16 98/18 104/5 105/25 117/18 117/18 119/9 121/25 123/10 124/4
violent [8] 65/20 87/18 92/14 94/11 95/17 99/9 117/5 123/9
Virginia [1] 51/16
vocational [1] 109/22
voice [1] 125/14
vote [3] 68/7 71/3 75/21
voted [1] 113/21
voters [2] 105/1 105/3
votes [7] 61/3 61/10 61/11 61/21 62/3 62/12 63/8
vs [1] 1/5
vulnerabilities [1] 86/5
vulnerable [2] 97/9 97/10

W

Waco [1] 117/10
waging [2] 82/10 94/17
waiting [1] 98/9
waived [1] 44/22
walk [3] 50/2 50/10 121/15
walking [2] 70/22 98/6
walkways [1] 101/12
wandered [3] 105/12 105/13 105/13
wandering [1] 49/21
want [30] 29/10 33/19 35/18 41/22 42/15 42/23 45/5 52/7 52/21 54/15 55/9 69/1 76/20 88/17 89/14 90/7 90/9 90/10 90/23 91/25 95/8 96/2 100/2 100/7 102/18 103/4 103/6 106/13 108/16 121/5
wanted [23] 34/17 42/9 47/19 51/25 53/9 53/11 53/18 53/25 56/14 57/24 57/25 58/23 60/15 60/22 61/17 61/20 70/8 90/8 97/4 101/12 102/22 117/17 121/6
wants [4] 53/19 60/6 90/5 93/25
war [14] 16/11 18/12 20/14 36/11 39/10 39/15 65/22 82/10 94/17 112/14 112/21 118/8 120/14 120/24
warn [1] 124/22
warned [1] 88/8
warrant [2] 7/1 82/2
warranted [2] 9/9 59/17
warrants [1] 86/15
was [295]
Washington [11] 1/5 1/17 2/17 20/6 68/11 70/5 100/5 118/6 118/11 118/16 126/4
wasn't [8] 4/14 45/1 47/8 53/3 56/25 71/24 91/6 118/24
watch [2] 49/16 50/14
watched [1] 98/17
watches [1] 124/15
watching [3] 40/11 58/2 58/2
water [1] 99/25
Watkins [3] 30/17 75/1 103/17
Watkins' [1] 30/19
wave [1] 17/9
way [35] 8/3 12/1 15/13 19/23 20/6 20/6 20/11 22/3 26/9 30/1 31/2 31/5 35/14 41/19 42/17 55/24 61/8 62/1 63/6 71/8 76/19 79/12 85/24 86/7 87/24 93/17 103/1 104/16 112/10 114/4 119/17 119/20 120/7 120/8 120/9
ways [3] 25/22 31/2 86/11
we [188]
we believe [3] 38/22 39/19 84/15
we will [7] 11/22 13/3 13/4 16/10 33/7 80/23 108/22
we'd [2] 60/4 89/5
we'll [3] 11/24 13/5 35/16
we're [18] 6/12 11/15 12/10 22/12 37/23 38/16 40/8 49/1 49/2 52/19 53/21 53/21 58/15 59/7 80/7 82/22 88/21 120/24
we've [6] 43/25 45/4 54/16 58/19 59/10 67/13
weaknesses [1] 86/11
weapon [2] 111/11 118/12
weapons [15] 16/23 20/11 20/19 25/6 66/16 66/18 66/19 66/21 74/2 76/16 78/23 84/23 113/11 118/8 119/4
wear [2] 99/25 100/3
wearing [3] 25/5 99/24 100/6
website [1] 85/7
Webster [2] 92/15 94/8
wedge [1] 50/23
week [3] 23/8 30/25 88/3
weeks [5] 24/22 24/22 36/7 37/2 92/12
welcome [1] 3/15
well [36] 5/17 10/2 11/14 13/19 21/14 21/16 22/1 22/14 23/22 27/23 31/5 36/25 37/10 41/19 42/14 44/5 44/6 46/23 49/19 50/3 53/2 57/9 59/8 65/11 65/14 67/2 72/12 76/23 78/4 82/15 87/19 97/11 101/1 117/12 122/12 126/16
well-aware [1] 22/14
well-trained [1] 117/12
went [20] 6/23 11/10 44/12 45/23 46/5 46/24 50/4 51/16 55/13 56/6 57/4 61/5 68/13 69/17 70/9 72/5 72/15 79/1 95/3 103/5
were [120] 5/18 5/19 5/21 11/6 11/10 15/16 16/5 19/12 20/2 21/20 22/21 23/4 30/6 31/5 31/23 32/8 33/24 35/22 39/13 41/5 41/8 41/17 43/4 43/9 43/11 44/19 46/14 46/15 49/19 49/22 50/1 51/23 54/17 56/3 56/8 56/8 58/1 59/3 59/15 60/24 61/18 63/8 65/1 65/15 65/17 65/18 66/18 66/20 68/22 69/9 70/5 70/8 70/22 71/19 72/12 72/22 73/11 73/12 74/16 74/17 74/20 74/25 75/1 75/4 75/10 75/11 75/18 76/4 78/15 79/2 85/1 85/6 85/23 86/2 86/8 90/3 90/3 92/7 92/21 94/9 94/11 94/15 94/21 94/21 95/3 95/4 95/16 97/2 97/5 97/10 97/12 97/15 98/21 98/22 99/2 100/5

W

were... [24] 100/6 101/2 101/10 101/11 102/25 103/2 103/14 104/9 104/11 105/3 105/15 110/10 111/6 111/12 112/23 115/2 115/5 119/6 120/13 120/17 120/23 121/10 121/14 121/14
were all [1] 94/11
weren't [7] 51/24 56/1 65/7 81/14 91/18 105/18 112/10
west [2] 51/23 102/14
what [151]
what's [3] 48/24 79/15 100/16
whatever [3] 51/12 54/5 95/19
whatsoever [1] 104/2
when [38] 5/25 12/1 14/16 20/16 20/18 33/3 36/12 39/18 41/5 42/18 44/11 45/22 47/24 48/11 49/9 50/14 51/12 54/23 68/13 71/18 72/5 72/12 74/21 98/2 99/19 100/5 100/21 101/20 102/16 103/18 104/17 107/17 113/1 120/8 121/17 121/21 121/23 124/25
whenever [1] 120/3
where [30] 6/25 7/5 7/10 19/14 23/22 25/19 31/9 31/11 33/7 35/4 35/22 37/22 40/7 40/21 50/9 51/22 51/23 52/15 59/7 68/1 81/5 85/7 97/25 98/4 100/23 101/10 101/11 101/16 102/11 126/23
whereby [1] 59/3
whether [29] 8/12 9/7 9/8 10/24 14/11 15/3 24/10 30/21 31/9 31/17 32/23 34/21 39/18 40/4 42/6 43/19 51/8 58/20 66/10 67/12 67/24 69/15 70/25 76/20 77/17 95/21 124/17 124/18 124/20
which [72] 4/24 5/3 7/3 8/17 10/16 10/19 11/20 13/13 13/19 15/25 17/4 17/13 18/4 20/12 21/25 22/1 22/5 27/9 27/10 28/1 28/2 31/8 35/5 39/19 43/18 44/1 47/23 53/12 57/13 58/15 60/24 61/1 63/24 64/11 65/2 65/4 65/5 67/8 67/13 69/13 71/7 74/5 76/20 78/9 78/15 79/7 80/4 80/20 80/23 85/3 85/7 87/25 88/6 93/22 94/15 94/21 104/20 105/6 107/2 107/23 110/4 110/5 111/25 112/2 112/4 112/5 112/6 112/17 113/10 119/10 122/15 126/9
while [7] 19/6 23/9 90/9 96/22 104/3 122/11 122/16
white [4] 16/10 104/20 113/20 116/10
White House [1] 16/10
who [84] 10/2 10/18 11/6 16/5 17/2 21/2 23/4 24/21 24/24 26/4 27/13 29/7 30/13 30/14 30/17 31/20 31/23 32/12 32/24 33/19 33/22 33/24 33/25 36/7 36/8 47/13 49/11 56/1 56/8 61/5 68/22 70/19 72/6 74/20 74/25 75/1 75/1 75/4 77/17 79/1 79/2 80/9 84/11 84/25 85/6 86/1 91/3 91/4 91/4 91/5 91/17 91/24 92/7 92/11 92/20 93/5 93/11 95/3 95/16 96/5 96/20 97/3 97/10 99/14 102/1 103/2 103/14 103/21 104/4 105/12 111/8 111/12 112/16 113/24 114/2 114/4 114/15 114/16 115/2 117/25 123/8 123/10 124/3 124/22
who's [2] 53/17 101/17
whole [2] 6/1 10/12
whom [2] 18/17 26/22
why [22] 31/13 38/21 38/22 40/18 45/19 53/20 59/12 64/20 67/2 68/4 68/19 70/16 72/25 73/12 98/8 101/9 101/14 102/20 105/15 110/9 114/13 114/14
wife [2] 87/14 117/22
wild [1] 51/3
wilfully [1] 22/18
will [62] 4/21 8/4 8/6 9/6 11/22 12/16 12/19 13/1 13/1 13/3 13/4 15/22 16/10 17/7 20/10 23/7 28/3 28/13 31/1 32/22 33/7 41/11 42/14 45/14 45/20 46/1 46/18 48/8 48/13 48/14 48/17 58/25 60/2 60/14 64/11 79/18 80/23 83/18 87/9 96/1 96/18 97/25 99/24 100/1 108/17 108/22 110/8 110/13 110/22 111/20 111/22 114/23 115/14 120/3 123/2 123/4 124/8 125/3 125/20 125/21 125/25 127/2
William [3] 2/14 128/2 128/8
willingness [2] 121/8 121/25
windows [1] 56/9
winds [1] 40/21
wing [2] 92/1 113/21
wink [3] 57/9 57/10 59/6
wins [1] 106/21
winter [1] 30/16
wise [1] 90/11
wish [2] 12/25 123/18
wit [1] 112/11
within [13] 11/25 22/22 36/1 43/25 60/3 65/16 67/2 74/6 74/16 83/23 122/21 126/4 126/17
without [14] 31/12 47/17 54/14 54/14 57/5 60/5 60/8 70/11 71/5 97/5 99/22 99/23 123/11 126/20
witness [8] 45/15 46/14 49/11 70/24 71/1 85/21 85/21 89/20
witnesses [8] 16/24 30/4 31/23 46/3 70/18 77/16 86/2 90/2
women [2] 97/10 117/11
won't [2] 17/9 106/18
Woodward [2] 37/15 38/2
Woodward's [2] 37/11 38/2
word [2] 13/22 36/10
wording [1] 42/24
words [17] 20/9 32/1 36/14 39/11 46/12 46/15 57/21 65/12 71/4 71/12 71/14 72/20 86/4 86/6 88/14 114/6 120/2
wore [1] 100/7
work [3] 21/3 48/23 121/20
worked [2] 27/13 116/2
working [1] 115/2
World [1] 94/22
World Trade Center [1] 94/22
worse [2] 107/8 111/13
worst [1] 103/16
would [121] 4/4 5/14 5/16 5/17 6/3 6/7 7/3 7/5 7/22 9/15 10/12 11/3 13/14 16/3 16/20 17/1 17/2 18/18 18/23 21/4 22/9 26/8 26/13 28/4 32/12 32/14 32/18 33/13 34/19 35/5 38/20 40/4 41/18 42/4 42/6 42/11 42/17 43/1 43/6 43/9 43/16 43/19 43/24 44/16 45/16 45/18 46/12 46/17 46/21 47/15 49/7 50/20 51/2 51/5 51/18 52/18 53/20 54/8 54/12 55/6 55/21 56/11 58/18 59/10 59/14 59/20 60/4 61/13 62/5 62/6 62/14 63/3 63/8 67/2 67/23 68/6 68/7 68/9 68/19 68/20 68/21 68/23 69/8 69/8 69/14 70/11 70/14 73/10 73/16 74/19 75/21 75/22 77/17 79/6 79/7 79/8 80/21 82/1 82/3 83/22 89/14 89/18 89/24 89/24 91/15 93/4 95/6 95/14 95/14 95/25 96/1 96/15 98/2 98/3 98/5 101/8 106/21 118/11 118/22 119/5 127/4
wouldn't [2] 53/23 70/6
wrap [1] 106/10
wrestling [1] 119/17
written [1] 48/23
wrong [4] 9/1 11/16 17/19 120/6
wrongdoer [1] 6/15
wrote [1] 112/13

Y

Yale [3] 21/1 73/12 116/1
Yale Law School [1] 116/1
Yeah [3] 34/18 55/18 57/24
year [6] 50/3 89/5 90/10 90/11 93/20 95/9
years [20] 21/2 38/23 40/18 81/13 81/19 83/21 88/22 89/7 89/17 92/12 95/20 95/21 95/21 95/22 95/22 110/4 110/5 115/16 115/18 122/5
yell [3] 17/9 99/16 99/19
yelled [2] 98/21 103/24
yes [14] 16/2 22/8 35/10 43/11 56/6 56/13 56/13 57/19 58/4 62/23 101/25 106/8 106/11 121/15
yesterday [31] 3/19 4/25 8/8 8/17 9/19 9/21 12/4 15/12 15/12 24/7 24/14 35/21 36/10 37/11 52/23 55/22 59/23 64/6 64/9 64/13 65/8 65/9 73/22 75/17 78/6 78/18 89/12 93/15 94/1 104/4 115/1
yet [5] 33/11 40/12 84/12 97/15 97/18
York [1] 105/19
you [280]
you know [2] 10/7 68/15
You wanted [1] 121/6
you'd [3] 22/7 55/15 55/15
you're [14] 39/18 54/9 60/17 69/19 89/16 89/19 89/22 90/24 114/13 118/3 118/3 119/16 120/5 126/18
you've [12] 9/16 47/1 52/8 52/20 57/12 57/20 89/9 89/16 89/17 95/20 95/22 120/11
young [4] 18/16 30/12 46/14 115/19
your [72] 3/2 13/2 13/25 14/2 22/8 33/13 37/14 41/3 41/8 41/17 41/18 42/3 42/21 42/22 44/5 48/14 48/14 51/8 51/25 52/3 58/13 58/15 60/13 60/16 60/19 60/21 61/14 62/14 62/25 63/3 63/10 68/15 83/19 85/10 88/16 89/1 89/11 89/21 89/22 95/2 95/24 96/8 96/10 100/2 106/11 108/8 108/21 114/7 114/8 114/10 114/18 116/13 117/7 117/19 117/19 117/20 117/21 117/22 117/22 117/23 119/4 120/4 120/25 121/24 121/24 122/16 123/21 124/9 125/7 126/15 126/22 127/6
Your Honor [30] 3/2 13/25 14/2 22/8 33/13 41/3 41/18 42/3 42/22 44/5 51/25 52/3 60/13 60/19 60/21 61/14 62/14 62/25 63/3 63/10 83/19 85/10 88/16 89/1 95/2 95/24 96/8 96/10 108/8 127/6
yours [1] 114/7
yourself [2] 93/21 121/23

Z

Zaremba [4] 2/14 27/5 128/2 128/8
zero [3] 34/12 99/9 99/12
Zimmerman [1] 17/1
Zoom [2] 14/11 42/20