

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case Number 21-cr-88-DLF
RONALD SANDLIN,	:	
	:	Bond Hearing: April 13, 2021
Defendant.	:	

**GOVERNMENT’S SECOND SUPPLEMENT TO ITS MEMORANDUM IN
OPPOSITION TO DEFENDANT RONALD SANDLIN’S MOTION FOR BOND**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this second supplement to its memorandum in opposition to the defendant’s motion for bond filed on March 22, 2021.

On the afternoon of April 12, 2021, the government received from the Department of Corrections several calls and text messages placed or sent by the defendant from jail. In light of the Court’s invitation at the last hearing to supplement the record with additional materials relevant to the detention issue as the investigation proceeds, the government hereby requests that the following points and authorities, as well as any other facts, arguments, and authorities presented at the upcoming bond hearing, be considered in the Court’s determination regarding pretrial detention.

At his bond hearing on April 6, 2021, the defendant addressed the Court directly, stating, among other things, that he regretted his actions on January 6, and that his actions were “shameful.” As the government indicated in prior filings, however, the defendant had not up until that point expressed remorse for his actions, unlike many other Capitol riot defendants, and in fact sought to celebrate and publicize them. As recently as March 30, 2021—one week prior

to his statement to the Court—he continued to celebrate his actions and appeared committed to publicizing them.

On that day, he wrote his mother from jail that he was “proud to call [the other Capitol riot inmates housed in the D.C. jail] my friends we stood up for what we believed in and sacrificed,” adding that he was “writing a book on my journey and I hope to turn it into [a] movie.” *See* Ex. A (excerpted pages from jail text message report). He also communicated with fellow rioter, Nick Alvear,¹ via text message from jail on April 7—the day after his statement to the Court—inviting him to “work together on making this a big movie and book.” *See id.* Providing a deeper view of his mental state, on March 30, he told his mother the following:

I’m at peace now and I’ve accepted that I’m here for a reason...it may sound self serving but I truly believe I have a divine destiny to fulfill and I/we made history that day and the full implications of our actions [have] yet to be realized.

Id. In other words, it does not appear that the defendant believes his actions were “shameful.”

The government submits that the defendant’s actions and statements provide “no evidentiary basis to assume that defendant will refrain from similar activities, if instructed, in the future.” *See U.S. v. Chrestman*, 21-cr-218, ECF No. 23, at 28. Based on the above and the government’s prior arguments, there is clear and convincing evidence that the defendant poses a continuing danger to the community as well as a serious risk to obstruct justice. For reasons stated previously, the government also submits that he is a risk of non-appearance by a preponderance of the evidence. The Court should therefore deny his motion for bond.

¹ Eduardo Nicolas Alvear Gonzalez, like the defendant, was identified as an individual smoking what appeared to be marijuana in the Capitol rotunda on January 6. He has since been charged with various unlawful entry offenses and was released on bond on March 24, 2021. *See U.S. v. Gonzalez*, 21-cr-115 (D.D.C. 2021).

Respectfully submitted,

CHANNING D. PHILLIPS
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D.C. Bar No. 415793

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Date: April 12, 2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of this pleading to be served upon defense counsel, Jerry Ray Smith, Jr., Esq., this 12th day of April 2021.

/s/

Jessica Arco
Special Assistant United States Attorney

	2021-04-10 T 08:36:14	2021-04-10 T 19:02:57	Wow ok. Ill tell dad to look for it	2021-04-10 T 08:36:14		RONALD SANDLIN
	2021-04-09 T 20:03:39	2021-04-10 T 08:35:47	can you look into that article for me? its on CNN	2021-04-09 T 20:03:41	RONALD SANDLIN	
	2021-04-09 T 20:03:00	2021-04-10 T 08:35:47	Federal prosecutors get the green light to start offering plea deals to Capitol riot defendants, attorneys say	2021-04-09 T 20:03:01	RONALD SANDLIN	
	2021-04-09 T 19:27:23		it'd crazy in here 23 hour lockdowns and sometimes days not out of cell. I went 2 weeks inside my cell straight. google me name I went viral for exposing conditions we are facing. I'm with all capitol people we are all good people. I'm trying to keep my head up I'm praying I get bonded out in Tuesday		RONALD SANDLIN	
	2021-04-09 T 12:20:24	2021-04-09 T 19:04:32	I have been following the trial on Twitter and your mom has been keeping me posted. Whats it like in there? How do you message me? Do they give you a computer? Also keep me posted on whats going on? I hope you are writing daily.	2021-04-09 T 12:20:25		RONALD SANDLIN
	2021-04-07 T 12:20:14	2021-04-09 T 12:17:47	hey nice to hear from you its pretty bad in here they beat one of us up bad its on the news	2021-04-07 T 12:20:15	RONALD SANDLIN	
	2021-04-08 T 20:07:02	2021-04-08 T 20:27:39	Just be very careful	2021-04-08 T 20:07:04		RONALD SANDLIN
	2021-04-08 T 20:03:22	2021-04-08 T 20:05:39	Well thats good.	2021-04-08 T 20:03:24		RONALD SANDLIN
	2021-04-08 T 20:02:54	2021-04-08 T 20:03:03	love you too. I guess my statement really made an impact the guard today said that the jail is nervous and they have definitely been nice to us since yesterday	2021-04-08 T 20:02:55	RONALD SANDLIN	
	2021-04-08 T 20:01:22	2021-04-08 T 20:01:41	Love you.	2021-04-08 T 20:01:25		RONALD SANDLIN
	2021-04-08 T 20:01:04	2021-04-08 T 20:01:13	thank you	2021-04-08 T 20:01:05	RONALD SANDLIN	
	2021-04-08 T 20:00:50	2021-04-08 T 20:01:01	yes	2021-04-08 T 20:00:52	RONALD SANDLIN	
	2021-04-08 T 19:52:57	2021-04-08 T 20:00:39	Is that enough for a few days?	2021-04-08 T 19:52:59		RONALD SANDLIN
	2021-04-08 T 19:52:38	2021-04-08 T 20:00:39	I added \$10 to GettingOut	2021-04-08 T 19:52:41		RONALD SANDLIN
	2021-04-08 T 19:50:50	2021-04-08 T 20:00:39	I dont know when he is getting the truck. We thought hed be leaving for DC. Which one do I put money on gor tablet? Getting out?	2021-04-08 T 19:50:52		RONALD SANDLIN
	2021-04-08 T 19:41:12	2021-04-08 T 19:49:23	can you send me more money for the tablet?	2021-04-08 T 19:41:14	RONALD SANDLIN	
	2021-04-08 T 12:06:12		I miss the hell out of you I know I'm nor supposed to say that but I do		RONALD SANDLIN	
	2021-04-08 T 11:37:06		how are you		RONALD SANDLIN	
	2021-04-07 T 16:47:19		nice can you send me what the article said in text? also i m writing a book and screenplay let's work together on making this a big movie and book		RONALD SANDLIN	Nick Alvear

	2021-04-02 T 10:45:30	2021-04-05 T 15:43:19	Dude getting out wouldn't let me sign on for 2 weeks its some serious bullshit, dude are you serious one of us got beat up in there!?!? WTF.... Ok. I'll look into this. Let everyone know my consultant lawyer told me 200 folks like us are in there unjustly. My crew started www.SaveThePatriots.org and we are going to get anyone we can out of there asap. Our future is bright bro. I will make the rounds and let people know about Ryan Samsel, I will reach out to his wife also.	2021-04-02 T 10:45:31	Nick Alvear	RONALD SANDLIN	
	2021-03-31 T 11:27:18	2021-04-02 T 10:42:37	contact his wife for more info its very important we get the news out bro	2021-03-31 T 11:27:19	RONALD SANDLIN	Nick Alvear	
	2021-03-31 T 11:26:25	2021-04-02 T 10:42:37	BTW the guards beat one of up real bad I need your help to let the media know his name is Ryan Samsel his wife's name is [REDACTED] broken nose, fractured orbital, blind in right eye, dislocated jaw, skull fracture, blood clots his attorney is Ryan Metcalf	2021-03-31 T 11:26:26	RONALD SANDLIN	Nick Alvear	
	2021-03-30 T 09:37:03	2021-04-02 T 10:42:36	good to hear from you bro! I'll let you know I think I'm being bonded out but who knows! I'm excited about the future	2021-03-30 T 09:37:04	RONALD SANDLIN	Nick Alvear	
	2021-03-31 T 12:00:40	2021-03-31 T 13:42:22	hey bro its Ronnie	2021-03-31 T 12:00:41	RONALD SANDLIN	[REDACTED]	
	2021-03-31 T 10:53:08	2021-03-31 T 15:06:14	thank you	2021-03-31 T 10:53:10	RONALD SANDLIN	[REDACTED]	
	2021-03-30 T 21:20:56	2021-03-31 T 10:40:03	[REDACTED]	2021-03-30 T 22:34:14	[REDACTED]	RONALD SANDLIN	
	2021-03-30 T 21:11:04	2021-03-31 T 10:40:03	I got it	2021-03-30 T 22:20:56	[REDACTED]	RONALD SANDLIN	
	2021-03-30 T 10:46:36	2021-03-30 T 13:18:12	send that to [REDACTED]	2021-03-30 T 10:46:37	RONALD SANDLIN	[REDACTED]	
	2021-03-30 T 10:46:19	2021-03-30 T 13:18:12	I'm doing OK. ups and downs. I'm in a cell block with all Capitol people. I'm proud to call them my friends we stood up for what we believed in and sacrificed. I'm looking forward to being a free man again and hopping on my motorcycle and riding off into the sunset far away from people and their machinations. I've learned a lot about myself in here. Solitary confinement is very very intense. Reading books is the most stimulation I get and most of the time its just me in my head. I've learned to be OK just being and being OK with myself and my own thoughts and for that lesson I'm grateful because I certainly wouldn't have gotten that on my own. I'm writing a book on my journey and I hope to turn it into movie. I plan on having Leonardo DiCaprio play me :-). I have so many stories to tell. I got a cock marble in prison lol (google it haha) I'm at peace now and I've accepted that I'm here for reason...it may sound self serving but I truly believe I have a divine destiny to fulfill and I/we made history that day and the full implications of our actions his yet to be realized. My bond hearing is in 2 weeks and I expect it to be on the news because I will be making an explosive statement...I won't ruin the surprise. My charges are pretty serious including 2 assault charges so I expect them to make an example out of me and to be in prison for a few years. I've come to peace with my actions and consequences. Josiah ratted/lied on me to save his own ass	2021-03-30 T 10:46:20	RONALD SANDLIN	[REDACTED]	[REDACTED]