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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
-oOo-

UNITED STATES OF AMERICA, Plaintiff, vs. RYAN W. PAYNE, Defendant.	)))))))))))	Case No 2:16-cr-046-GMN-PAL **DEFENDANT RYAN PAYNE'S MOTION FOR ORDER TRANSFERRING JURY TRIAL TO A DIFFERENT VENUE, OR ALTERNATIVELY, TO CONDUCT THE JURY TRIAL IN RENO, NEVADA** (Hearing Requested)

Certification: This Motion is timely filed.

COMES NOW, Defendant Ryan W. Payne, through his counsel, WILLIAM CARRICO, RYAN NORWOOD and BRENDA WEKSLER, Assistant Federal Public Defenders, and respectfully requests the Court for an Order Transferring the Jury Trial to another District or, alternatively, to Hold the Trial in Reno, Nevada. Based on the consistent and inflammatory media coverage, particularly in Las Vegas, surrounding this matter, a trial within the District of Nevada will violate Mr. Payne's due process rights. Accordingly, Mr. Payne submits, for the reasons set

forth in the attached Memorandum of Points and Authorities, that his trial must be moved from Las Vegas to another district in the Ninth Circuit to ensure his Fifth Amendment due process rights are protected.

DATED this 3rd day of October, 2016.

RENE VALLADARES
Federal Public Defender

By: */s/ William Carrico*
WILLIAM CARRICO
Assistant Federal Public Defender

By: */s/ Ryan Norwood*
RYAN NORWOOD
Assistant Federal Public Defender

By: */s/ Brenda Weksler*
BRENDA WEKSLER
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MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTS AND PROCEDURAL HISTORY

On April 12, 2014, individuals gathered in Bunkerville, Nevada, at the ranch of co-defendant Cliven Bundy to protest the government's attempt to seize Mr. Bundy's cattle. ECF No. 27, p. 2. This protest received substantial local and national media attention. The government alleges some of the protestors were armed. *Id.* At some point that day, Bureau of Land Management (BLM) employees arrived to seize the cattle, but eventually left without seizing the cattle. *Id.*

On January 2, 2016, a group comprised of some of the protestors in the 2014 Bunkerville protest, including many of Mr. Bundy's sons, went to Malheur National Wildlife Refuge in Oregon to protest the government's prosecution of two men convicted of starting a fire in the refuge. *See United States v. Payne* (*Oregon Case*), D. Or., Case No. 3:16-cr-00051-BR-4, ECF Nos. 1, 14. Because of the relationship between the Bunkerville and Oregon protestors, the Las Vegas press gave extensive media coverage of the Oregon protest. The Oregon protest lasted a few weeks, culminating with the shooting of one of the protestors by law enforcement. *Id.*

On January 27, 2016, the government moved to unseal a redacted criminal complaint filed against Defendant Ryan Payne and seven co-defendants in the District of Oregon for the conduct allegedly committed during the Oregon protest. Oregon case, ECF Nos. 12-14. On February 3, 2016, an unsealed, redacted indictment in the Oregon case was filed against Mr. Payne and 15 co-defendants who were present at the Oregon protest. *Id.* at ECF No. 58. Many of the defendants in the Oregon case, including Mr. Payne, have pled guilty pursuant to plea agreements. *Id.* at ECF No. 906. The remaining defendants are currently in trial.

On February 17, 2016, a grand jury returned the indictment in the instant case alleging multiple offenses against five defendants, including Mr. Payne, stemming from the April 2014 Bunkerville protest. ECF No. 5. The grand jury returned a superseding indictment on March 2, 2016, adding the rest of the current co-defendants. ECF No. 27. The jury trial is set for February 6, 2017 in Las Vegas. ECF No. 321.

II. ARGUMENT

A. The Court should order the jury trial in this case to be transferred to another federal district.

"The Sixth Amendment secures to criminal defendants the right to trial by an impartial jury." *Skilling v. United States*, 561 U.S. 358, 377 (2010). "If pretrial publicity is such that it is impossible to seat such a[n impartial, indifferent] jury, a judge must grant a defendant's request for a change of venue." *Randolph v. Cal.*, 380 F.3d 1133, 1142 (9th Cir. 2004); *see also* Fed. R. Crim. P. 21(a) ("Upon the defendant's motion, the court must transfer the proceeding against that defendant to another district if the court is satisfied that so great a prejudice against the defendant exists in the transferring district that the defendant cannot obtain a fair and impartial trial there.").

A motion for change of venue must be granted when the defendant demonstrates either presumed or actual prejudice. *Hayes v. Ayers*, 632 F.3d 500, 507-508 (9th Cir. 2011). Presumed prejudice exists "when the record demonstrates that the community where the trial [is] held was saturated with prejudicial and inflammatory media publicity about the crime." *Id.* at 508 (internal quotation marks omitted). "Under such circumstances, it is not necessary to demonstrate actual bias." *Harris v. Pulley*, 885 F.2d 1354, 1361 (9th Cir. 1988). Actual prejudice exists "when voir dire reveals that the jury pool harbors actual partiality or hostility [against the defendant] that [cannot] be laid aside." *Hayes*, 632 F.3d at 508 (internal quotation marks omitted).

Mr. Payne can demonstrate the Las Vegas community is, and has been since 2014, deeply saturated with inflammatory and prejudicial local media coverage of the 2014 Bunkerville protest, the 2016 Oregon protest, the subsequent indictment in response to the Oregon protest, and the indictment in the instant matter. Thus, under the presumed prejudice analysis, this Court should order the trial of this matter transferred to another district in the Ninth Circuit.

Furthermore, during voir dire, Mr. Payne will be able to show that the jury pool in this community is actually biased against him as well as his co-defendants and incapable of sitting as impartial jurors. The actual prejudice that exists in this community thus provides another ground compelling the transfer of venue.

1. The unrelenting and inflammatory media coverage in Las Vegas of the 2014 Bunkerville protest, the 2016 Oregon wildlife protest, the prosecution in Oregon, and the subsequent indictment of this case demonstrates presumed prejudice.

The following three non-exhaustive factors address whether the Court must presume prejudice exists such as to prevent the defendant from receiving a fair trial in the indicted district:

(1) whether there was "a barrage of inflammatory publicity immediately prior to trial, amounting to a huge . . . wave of public passion";

(2) "whether the news accounts were primarily factual because such accounts tend to be less inflammatory than editorials or cartoons"; and

(3) "whether the media accounts contained inflammatory or prejudicial material not admissible at trial."

Daniels v. Woodford, 428 F.3d 1181, 1211 (9th Cir. 2005) (finding change of venue was required) (internal quotation marks and citation omitted).

The volume of media coverage in Las Vegas and nationally of the 2014 Bunkerville protest continuing to the present day has been and continues to be substantial. The government's discovery includes television news broadcasts on the Bunkerville protest. *See* Exhibit A, Government's Critical Mention Report.[1] The government collected **417** television news broadcasts that aired nationally between April 12, 2014, and April, 14, 2014, **62** of which aired in Las Vegas. *Id.* That means, in the span of only three days, the Las Vegas community was exposed to an average of 20 news reports a day covering the Bunkerville protest.

More troubling than the volume of local media attention is the inflammatory nature of the coverage. The LAS VEGAS REVIEW-JOURNAL published numerous articles and editorials excoriating the people present at the Bundy Ranch in Bunkerville in April 2014. One article reported Senate Majority Leader Harry Reid "has called Bundy's gun-toting allies 'domestic terrorists." John L. Smith, *Shoshone sisters also couldn't beat BLM*, LAS VEGAS REVIEW-JOURNAL, Apr. 24, 2014; *see also* Alan O'Neill, *Rancher in land dispute is a bully, not a hero,* Other Voices, LAS VEGAS SUN, Apr. 6, 2014. Most prejudicially, another editorial linked the events at Bunkerville to the tragic murders in June 2014 of two local police officers and a bystander who attempted to intervene by Jerad and Amanda Miller. Jeff German, *Bunkerville "success" may spur anti-government fight*, LAS VEGAS REVIEW-JOURNAL, June 10, 2014.

The frenzied media coverage lasted throughout 2014. *See, e.g.*, Anonymous Editorial, *The incorrigible Michele Fiore's would-be land grab*, LAS VEGAS SUN, Apr. 5, 2015 (calling those involved in the 2014 protest at Bunkerville "militant rebels"); Letter to the Editor, Subsidies

[1] Along with this Motion, the defense has manually filed a disc containing the excel spreadsheet which constitutes Exhibit A. Also on that disk are the news articles referenced herein in PDF form that constitute Exhibit B. For the Court's convenience, the citations to the articles also contain hyperlinks to the online version of the articles.

benefit welfare ranchers, LAS VEGAS SUN, May 4, 2014; Letter to the Editor, *Hate-filled racists expose themselves*, LAS VEGAS SUN, May 10, 2014; Steve Sebelius, *Bundy bunch ought to face justice for their crimes*, LAS VEGAS REVIEW-JOURNAL, July 16, 2014; Anonymous Editorial, *Radical right's "patriot" movement is really just anarchy*, LAS VEGAS SUN, July 20, 2014 (outlining the "dangers" of the actions of the protestors at Bunkerville in 2014); Steve Sebelius, *Top 5 worst Cresent Hardy quotes - and by "worst; I mean "best,"* LAS VEGAS REVIEW-JOURNAL, Sept. 24, 2014 (calling the protestors at Bunkerville in 2014 "scores of armed insurrectionists"); Steve Sebelius, *Why is this man smiling? Because it's time for the Friday Slashback!*, LAS VEGAS REVIEW-JOURNAL, Sept. 26, 2014 ("Personal to 'Cliven"' in Bunkerville: If you want freedom, you've got to take the commensurate personal responsibility, bro. That's how it works."); Assemblywoman Heidi Swank, *Investing in public lands will pay off*, LAS VEGAS SUN, Oct. 21, 2015 (talking about "Cliven Bundy and his bullies"); Steve Sebelius, *The totally real threat of unspecified, vague, things that might someday happen*, LAS VEGAS REVIEW-JOURNAL, Dec. 10, 2014 (calling the protestors at Bunkerville in 2014 "armed insurrectionists" and "out-of-state misfits playing soldier"); Steve Sebelius, *One crazy year*, LAS VEGAS REVIEW-JOURNAL, Dec. 21, 2014; Steve Sebelius, *Farewell, 2014!*, LAS VEGAS REVIEW-JOURNAL, Dec. 28, 2014 (stating Cliven Bundy "called for a range war and surrounded himself with gun-toting militia types who faced off with the feds").

In August 2014, one editorial began by describing the most well-known co-defendant—Cliven Bundy—as "Ranting racist rancher Cliven Bundy," and proceeded to question the religiosity of Mr. Bundy and egregiously asked whether Mr. Bundy was taking orders from Satan. Steve Sebelius, *Are you there, God? It's me, Cliven*, LAS VEGAS REVIEW-JOURNAL, Aug. 6, 2014. A Letter to the Editor *again* placed the 2014 Bunkerville protest alongside the tragic murders in

June 2014 of two local police officers and a bystander. Letter to the Editor, *NRA is controlling our country*, LAS VEGAS SUN, June 13, 2014; *see also* Annalise Little, *Nevada marked by 150 years of murder, mayhem*, LAS VEGAS REVIEW-JOURNAL, Oct. 25, 2014 ("Their [the Miller's] paranoid, anti-government motives were later revealed in videos they posted online and in reports of their attempts to join Bunkerville rancher Cliven Bundy's standoff with federal authorities earlier in the year."); Mike Blasky, et al, *Shooters carried arsenal, supplies into Sunday rampage*, LAS VEGAS REVIEW-JOURNAL, June 9, 2014 (discussing the Millers' alleged visits to the Bundy ranch); Jeff German, *Experts: Couple in Las Vegas police ambush displayed classic anti-government ideologies*, LAS VEGAS REVIEW-JOURNAL l, June 9, 2014 (claiming the 2014 Bunkerville protest "completely galvanized and emboldened" the Miller's murderous actions); *Vegas cop killings, Bundy standoff among top 10 news stories for 2014*, LAS VEGAS REVIEW-JOURNAL, Dec. 27, 2014. The local media also reported that the Clark County Sheriff called for those involved in the 2014 Bunkerville protest to be punished. Mike Blasky, *Sheriff: Cliven Bundy should be held accountable for crossing the line*, LAS VEGAS REVIEW-JOURNAL, July 3, 2014.

The prejudicial media coverage continued into 2015, such as when another editorial described those present at Bunkerville in 2014 as "hordes of well-armed, self-styled militia types" and the Bundy ranch "an armed insurgent camp." Steve Sebelius, *Some Republicans want to throw the feds in jail?*, LAS VEGAS REVIEW-JOURNAL, Mar. 25, 2015. A letter to the editor again connected the 2014 incident in Bunkerville to the murder of two law enforcement officers in Las Vegas around the same time. Letter to the Editor, *Lawbreaking Bundy doesn't deserve coverage*, LAS VEGAS REVIEW-JOURNAL, May 24, 2015. The letter concluded by calling for Cliven Bundy to be hanged. *Id.*

The inflammatory editorials and news coverage in Las Vegas gained an even more incendiary tone during the Oregon protest. Brian Greenspun—the CEO, publisher, and editor of the LAS VEGAS SUN—penned one of the editorials about the Oregon and Bunkerville protests. Greenspun tied both President Obama's stance on gun control and the current presidential campaign of Donald Trump to the Bunkerville and Oregon protests. Brian Greenspun, *Obama takes on guns; Bundy takes up guns*, LAS VEGAS SUN, Jan. 10, 2016. Greenspun's editorial concluded President Obama's commitment of millions of dollars to studying mental illness and gun procurement should focus on the Oregon protestors, arguing: "I can't imagine a stronger correlation between gun ownership and mental health concerns." *Id.* Another commentary discussed the Oregon protest, tied it back to the events in Bunkerville in 2014, repeatedly called the protestors present at Bunkerville in 2014 "armed insurrectionists," and demanded their immediate prosecution. Steve Sebelius, *Not prosecuting lawbreakers leads to more crime*, LAS VEGAS REVIEW-JOURNAL, Jan. 5, 2016. Another article described the Oregon protestors as "invasive species" and told them to "get back to the home range, boys." John L. Smith, *Constitution cowboys out of place in Oregon*, LAS VEGAS REVIEW-JOURNAL, Jan. 5, 2016. Yet another opinion piece called Cliven Bundy a "welfare cowboy," supporters of the protestors delusional, and declared the protest illegal. Steve Sebelius, *Blood on the ground in Oregon, and for what?*, LAS VEGAS REVIEW-JOURNAL, Jan. 28, 2016.

The public called for the prosecution of the 2014 Bunkerville events. One letter to the editor complained: "The federal government made a big mistake in letting them get away with the last incident in Bunkerville." Letter to the Editor, LAS VEGAS REVIEW-JOURNAL, Feb. 3, 2016. *See also* John L. Smith, *Oregon wants to turn out the lights on Bundys*, LAS VEGAS REVIEW-JOURNAL, Jan. 22, 2016; John L. Smith, *Nevadans meddle in Oregon's business*, LAS VEGAS

REVIEW-JOURNAL, Feb. 15, 2016. And, another Letter to the Editor tied the 2014 Bunkerville and 2016 Oregon protests to the murder of the two law enforcement officers in Las Vegas in June 2014. Letter to the Editor, *Bundys need to change tactics*, LAS VEGAS SUN, Feb. 9, 2016.

After the indictment in Oregon, an opinion piece joked that Ammon and Ryan Bundy would "be able to occupy a government facility for what appears to be an indefinite time". . . in jail. Steve Sebelius, *Still waiting for justice*, LAS VEGAS REVIEW-JOURNAL, Feb. 6, 2016. The same piece reiterated a prior public label, calling Cliven Bundy "a welfare cowboy" and again asked for the prosecution of the 2014 Bunkerville events, stating "they [Ammon and Ryan] and plenty of others still have not faced justice for the events of 2014." *Id.*

Local press has covered the *Oregon case* as though it were occurring in Las Vegas. Local press has reported on the charges, the court filings, the guilty pleas, and the trial in the Oregon case. *See, e.g.*, Associated Press, *Ammon Bundy jury pool shrinks in Oregon with eliminations*, reprinted by LAS VEGAS REVIEW-JOURNAL, Aug. 23, 2016; Jeff German, *Charges against radio talk show host dismissed on eve of Oregon standoff trial*, LAS VEGAS REVIEW-JOURNAL, Sept. 6, 2016; Associated Press, *Oregon standoff case jurors see video of occupiers at wildlife refuge firing rifles*, LAS VEGAS REVIEW-JOURNAL, Sept. 26, 2016.

The press has also specifically reported that Mr. Payne has pled guilty in the Oregon case. Jeff German, *Key defendant in Bundy armed takeovers to plead guilty in Oregon case*, LAS VEGAS REVIEW-JOURNAL, July 14, 2016.

The inflammatory press coverage continued when the government unsealed the indictment and made this prosecution public. The U.S. Attorney for the District of Nevada, the U.S. Bureau of Land Management Director, and the special agent in charge of the FBI in Nevada all gave statements to the local press, who in turn printed the prejudicial statements. Jeff German,

Cliven Bundy indicted for role in 2014 Bunkerville confrontation, LAS VEGAS REVIEW-JOURNAL, Feb. 17, 2016. When the rest of the co-defendants named in the indictment became public, the U.S. Attorney General and the Director of the FBI also gave prejudicial public statements, which the local press reported. Jeff German, *14 more Bundy Bunkerville suspects indicted*, LAS VEGAS REVIEW-JOURNAL, Mar. 3, 2016.

In April of this year, Senator Reid also condemned the Bunkerville protestors during a speech on the Senate floor, which was reported in the local press. Jeff German, *Harry Reid attacks Bundys on Senate floor, calls for Gold Butte protection*, LAS VEGAS REVIEW-JOURNAL, Apr. 7, 2016. In his speech, the Nevada senator called the protestors "a dangerous group of militants" and repeated his opinion the protestors are domestic terrorists:

> "This particular episode of domestic terrorism has roots in Nevada, I'm sorry to say," Reid told his colleagues. "They were led by the sons of Cliven Bundy. Cliven who, as we speak, is where he should be — in jail."

Id.

The prejudicial editorials also resumed. One written as recent as July 2016 boldly proclaimed the shooters in the recent horrific shootings of law enforcement in Dallas and Baton Rouge "might have felt emboldened by the inciting behaviors of bullies who challenge authority and threaten to take matters into their own hands." Anonymous Editorial, *Beware of following the lead of playground bullies*, LAS VEGAS SUN, July 25, 2016. The editorial was addressing the 2014 protest in Bunkerville. *Id.* The editorial also blamed the 2014 shooting of two local law enforcement officers discussed above on the Bunkerville protest. *Id.* The article again repeated and praised Senator Reid's proclamation that the Bunkerville protestors were "nothing more than domestic terrorists." *Id.*

The local press has continued to report on every action in the instant prosecution. *See, e.g.*, Jeff German, *Bundy son, another defendant held without bail in Bunkerville standoff*, LAS VEGAS REVIEW-JOURNAL, Mar. 21, 2016; Jeff German, *Bundy brothers, three others refuse to enter pleas in Bunkerville standoff*, LAS VEGAS REVIEW-JOURNAL, Apr. 15, 2016; Jeff German, *Third defendant Bunkerville standoff case reaches plea deal*, LAS VEGAS REVIEW-JOURNAL, Sept. 1, 2016; Jeff German, *Cliven Bundy lawyer wants off Bunkerville standoff case*, LAS VEGAS REVIEW-JOURNAL, Sept. 27, 2016.

The media's constant and inflammatory coverage in Las Vegas of the Bunkerville protest, the Oregon protest, the Oregon criminal proceedings, and the instant criminal proceedings, demonstrates that this Court must presume prejudice because Mr. Payne's rights to a fair trial by an impartial jury cannot be guaranteed in Las Vegas. The amount of editorials and opinion pieces lambasting the protestors and calling then inflammatory names, such as "armed insurrectionists," show the media did not confine itself to reporting on the facts. The repetitious local coverage of Nevada Senator Reid's characterization of the protestors as "domestic terrorists" demonstrates the level of hostility and impartial feelings in the Nevada community for the protestors.

The media coverage also tainted the Las Vegas community with evidence and prejudicial connections the government would not ever be able to present at trial. Most prejudicial is the media's connection of the April 2014 Bunkerville protest to the June 2014 murders of two law enforcement officers and a bystander. The local media's coverage of the Oregon proceedings and trial has also introduced into the Las Vegas community evidence from the Oregon case that would also not be admissible in Mr. Payne's trial here. Indeed, the intensity of reporting on the Oregon proceedings in Las Vegas render the two cases irretrievably linked.

The inflammatory media coverage has continued with such consistency and potency from April 2014 to the present that the Court must presume that coverage will not only continue but will undoubtedly intensify as the February 2017 trial approaches. The only way to protect Mr. Payne's right to a fair trial in light of the prejudicial media coverage is to transfer the jury trial to another district in the Ninth Circuit.

2. Mr. Payne will be able to show the members of the jury pool harbor partiality against the defendants in this case such as to demonstrate actual prejudice.

Mr. Payne submits that voir dire will demonstrate that the jury pool in Las Vegas is actually prejudiced against the defendants in this matter. If the Court does not grant the instant motion on presumed prejudice grounds, Mr. Payne will renew and supplement his venue transfer request for actual prejudice at the appropriate time.

B. Alternatively, the Court should hold the jury trial in Reno or at least pick the jury from the northern Nevada jury pool.[2]

If the Court denies Mr. Payne's request to transfer his trial to another federal district, Mr. Payne requests the Court conduct his trial at the Reno federal courthouse. As demonstrated, the pretrial publicity in Las Vegas has been inflammatory, prejudicial, and constant since 2014. Moving the trial to Reno would reduce some of that prejudice as the government's discovery indicates the Reno community has been bombarded with inflammatory news coverage less than Las Vegas. Exhibit A (only 17 news stories on the 2014 Bunkerville protest aired between April, 12, 2014 and April 14, 2014, compared with the 62 in Las Vegas). As the Reno courthouse is in

[2] Mr. Payne makes the following alternative requests without waiving his request that the jury trial must be moved to a different federal district.

the same judicial district, Mr. Payne's request is reasonable and would not unduly burden judicial resources.

As an alternative to holding the actual trial in Reno, the Court could select the jury from the Reno jury pool and hold the trial in Las Vegas. Either option will lessen the prejudice to Mr. Payne's right to a fair trial by an impartial jury.

CONCLUSION

The negative publicity in this case in Las Vegas has been constant and voluminous, continues to this day and will continue through trial. As the trial draws nearer, the media attention will only increase, reaching the televisions, radios, newspapers, and computer screens of thousands of potential jurors in Clark County. Mr. Payne therefore requests the Court transfer his case to another federal district. Alternatively, if the Court does not transfer this case to another federal district, Mr. Payne respectfully requests the Court conduct the trial in Reno or at least use the Reno jury pool to fill the venire in this matter. Finally, should the Court deny this motion, Mr. Payne respectfully requests leave to review it at voir dire and as new information and evidence on the Las Vegas jury pool is acquired.

DATED this 3rd day of October, 2016.

Respectfully Submitted,

RENE VALLADARES
Federal Public Defender

By: */s/ William Carrico*
WILLIAM CARRICO
Assistant Federal Public Defender

By: */s/ Ryan Norwood*
RYAN NORWOOD
Assistant Federal Public Defender

By: */s/ Brenda Weksler*
BRENDA WEKSLER
Assistant Federal Public Defender

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on October 3, 2016, she served an electronic copy of the above and foregoing **DEFENDANT RYAN PAYNE'S MOTION FOR ORDER TRANSFERRING JURY TRIAL TO A DIFFERENT VENUE, OR ALTERNATIVELY, TO CONDUCT THE JURY TRIAL IN RENO, NEVADA** (Hearing Requested) by electronic service (ECF) to the person named below:

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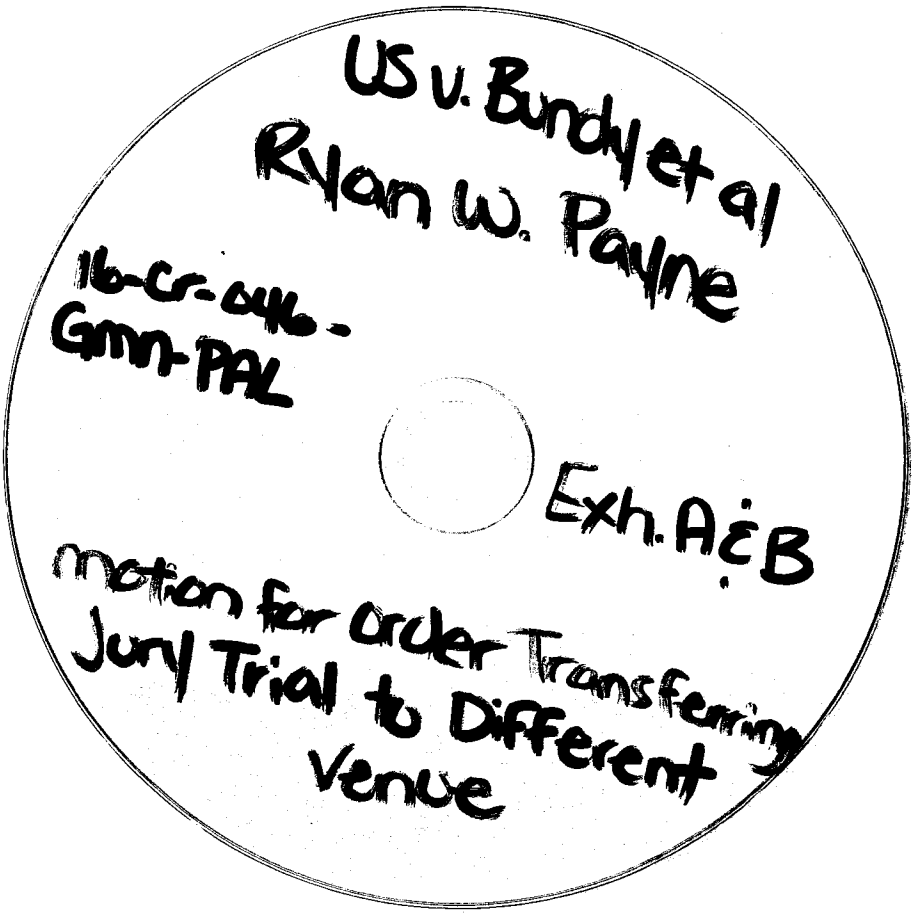
/s/ Lauren Pullen
Employee of the Federal Public Defender

EXHIBIT “A & B”

EXHIBIT “A & B”


US v. Bundy et al
Ryan W. Payne
16-cr-046-
GMN-PAL
Exh. A & B
motion for Order Transferring
Jury Trial to Different
Venue