April 25, 2022

LEAVE TO FILE GRANTED

From: Joseph Connolly, M.A., QMCS, USCG (Ret.)

To:	El Dorado County Board of Supervisors
Copy:	El Dorado County Chief Administrative Officer
	El Dorado County Counsel

Subj: Proud Boy Ricky Willden Plea - El Dorado County Implications

Dear Supervisors:

This month members of the Proud Boys pled guilty to charges stemming from their planning and carrying out the January 6, 2021 attack on the U.S. Capitol. Their plea deals include cooperating with ongoing investigations of that attack.

Ricky Willden of Oakhurst, California, has close connections to commissioners Chris Cockrell and Keeley Link, and local extremists such as Patrick Kiehl, the chapter president of the Hangtown Proud Boys. Charles Donohoe of North Carolina was a member of the Proud Boys leadership group that planned and carried out the Capitol attack.

Proud Boy Eddie Block of Madera, California joined in the Capitol attack and livestreamed the Proud Boys group carrying it out. Block is a friend of commissioner Cockrell, creating a direct link between you and the conspiracy to obstruct Congress and subvert the 2020 Presidential election results. A federal judge recently called that conspiracy "a coup in search of a legal theory" and an obvious illegality.

Since February, 2021 you have appointed three commissioners with links to extremist groups and individuals who conspired to overthrow our national government. Those connections to the Capitol attack do grave harm to the County's reputation and carry serious legal implications related to giving aid and comfort to enemies of the United States such as Willden, Donohoe and Block.

The facts of these matters are now within your threshold to take sufficient notice and act accordingly in the best interests of El Dorado County.

Sincerely,

s/Joseph Connolly

Encl: (1) Local Steps to a National Insurrection: Proud Boys plea deals link local extremists to the Jan. 6, 2021 Insurrection

Local Steps to a National Insurrection:

Proud Boys plea deals link local extremists to the Jan. 6, 2021 Insurrection





Proud Boy Ricky Willden November 14, 2020 Sacramento, CA

Proud Boy Ricky Willden January 6, 2021 Washington, DC

An Independent Citizen's Review of Relationships Between Insurrectionists and El Dorado County Commissioners

> Prepared and Submitted by: Joseph Connolly, M.A.

> > April 25, 2022

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INTRODUCTION

On January 6, 2021 the U.S. Capitol ("Capitol") was attacked by extremists seeking to obstruct the Congressional certification of the 2020 Presidential election. On that date the exterior plazas surrounding the Capitol were closed to the public, and only authorized persons with appropriate identification were authorized to enter the Capitol.¹

The Capitol attack ("Attack") was planned and carried out by a nationwide group of Proud Boys, in concert with others. The purpose of their conspiracy "was to stop, delay, and hinder the Certification of the Electoral College vote" by Congress.²

The Proud Boys "knew and understood ... [they] would resort to unlawful conduct to achieve [their] objective," that "storming the Capitol would be illegal," and it was "reasonably forseeable ... that members of the Proud Boys who had been led to the Capitol ... would engage in assaults on law enforcement."³

"The attack on the Capitol resulted in substantial damage, requiring the expenditure of more than \$1.4 million dollars for repairs."⁴

In the months preceding the Capitol attack, local extremists attended various rallies and protests that included violence and weapons, such as bear spray, that would be employed against law enforcement officers guarding the Capitol from insurrectionist groups and individuals.

This review shows how extremist individuals and groups linked to three El Dorado County commissioners acted in concert here and in Washington, DC to unlawfully "stop, delay, and hinder" an official Congressional proceeding.

The El Dorado County Board of Supervisors appointed those commissioners starting in February, 2021, who serve with no enforceable standard other than "at the pleasure of" the Board members. Thus far, it has been the Board's pleasure to not acknowledge the commissioner's extremist connections in any way.

¹ See <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492866/download</u>, paragraphs 1-3.

² See <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1480986/download</u>, paragraphs 26-107.

³ See <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492996/download</u>, paragraphs 6, 17, 37.

⁴ *Id.*, paragraph 47.

"END DOMESTIC TERRORISM RALLY" PORTLAND, OREGON - SEPTEMBER 26, 2020

On October 1, 2020 Proud Boy Eddie Block of Madera, California posted a video of a September 26th Proud Boys rally in Portland, Oregon, titled "End Domestic Terrorism Rally."⁵

Attendees who would eventually be indicted for their acts to plan and carry out the Capitol attack included Proud Boys chairman Enrique Tarrio,⁶ Joe Biggs,⁷ and Daniel Scott.⁸ All three were Florida residents.



Proud Boys Chairman Enrique Tarrio

⁵ See e.g., <u>https://www.theguardian.com/us-news/2020/sep/26/proud-boys-rally-portland</u> -oregon-kate-brown-ted-wheeler-trump; <u>https://www.opb.org/article/2020/09/26/live</u> -updates-portland-under-state-of-emergency-as-hate-group-holds-rally/.

⁶ See e.g., <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1480986/download</u>. ⁷ See e.g., <u>https://www.justice.gov/opa/page/file/1357251/download</u>;

https://www.justice.gov/usao-dc/case-multi-defendant/file/1481001/download. ⁸ See e.g., <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1395876/download;</u> <u>https://extremism.gwu.edu/sites/g/files/zaxdzs2191/f/Daniel%20Lyons%20Scott%20Indictm</u> <u>ent.pdf</u>.



Proud Boy Joe Biggs



Proud Boy Daniel Scott, aka "Milkshake"

Biggs was one of the rally organizers. His ironic public comments-given his lead role in attacking the U.S. Capitol less than four months later-included, "We shouldn't become violent and assault people, and burn shit down because we didn't get our way. That's very childish. ... We're a drinking club. We'd like to go back to being a drinking club."⁹



Joe Biggs interview, with Eddie Block highlighted in background

⁹See <u>https://twitter.com/i/status/1309908299559522304</u>.

A. PROUD BOY RICKY WILLDEN - FUTURE GUILTY INSURRECTIONIST

Block's video highlighted Proud Boy Ricky Willden by saying, "There's my security right there. ... This is my boy Chris. He's from Fresno. He came with me. He's taking care of me."¹⁰ Willden's middle name is Christopher.¹¹



Proud Boy Ricky Willden

Willden was also indicted for participating in the Capitol attack. He pled guilty on April 7, 2022 to one count of assaulting, resisting, or impeding certain officers, in exchange for the dismissal of seven remaining counts.

Willden's plea requires him to cooperate with additional investigations and to pay the Architect of the Capitol \$2,000 in restitution for damages to the Capitol. He faces up to 8 years in prison and a \$250,000 fine for his guilty plea.¹²

 ¹⁰ Source: <u>https://www.youtube.com/watch?v=CaOqB9NqAwc&ab_channel=EddieBlockFilms</u>.
 ¹¹ See <u>https://www.justice.gov/usao-dc/pr/california-man-arrested-assault-law</u>
 <u>-enforcement-during-jan-6-capitol-breach</u>.

¹² See <u>https://lawandcrime.com/u-s-capitol-breach/self-proclaimed-member-of-the-proud</u> -boys-enters-guilty-plea-admits-to-unloading-chemical-spray-on-police-during-jan-6-c apitol-attack/;

https://www.justice.gov/usao-dc/case-multi-defendant/file/1461781/download; https://www.justice.gov/usao-dc/case-multi-defendant/file/1492861/download.

TRUMP RALLY SACRAMENTO, CA - NOVEMBER 14, 2020

Multiple political rallies were held in downtown Sacramento after the 2020 election.¹³ Protestors contesting the Presidential election results were joined by Proud Boys who clashed with counter-protestors using violent means that would be replicated during the Capitol attack, such as chemical irritants like bear spray.

On November 14, 2020, Willden was part of a Proud Boys group who attacked counter-protestors. The group included Patrick Kiehl, chapter president of the newly formed Hangtown Proud Boys, and State of Jefferson Proud Boys who would join Kiehl's chapter at a Placerville Toys for Tots event on December 5, 2020.

Willden was seen assaulting three counter-protestors, while other Proud Boys fought and sprayed counter-protestors with bear spray.¹⁴



Proud Boys Ricky Willden (in yellow); Patrick Kiehl (in red) NOTE: Kiehl's vest includes a "Boots on the Ground Cali" patch (circled in red)

 ¹³ See e.g., December 19, 2020 tweet noting "7th straight weekend of downtown protests," at <u>https://twitter.com/SRodd_CPR/status/1340398799030611968</u>.
 ¹⁴ See e.g., <u>https://www.rawstory.com/capitol-riot-arrests-2653608319/</u>.

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Willden assaulting first counter-protestor



Willden striking second counter-protestor in the face



Willden preparing to assault third counter-protestor



Willden striking third counter-protestor in the face

A. PROUD BOYS & CONNECTIONS TO EL DORADO COUNTY

At least two Proud Boys in the group with Willden and Kiehl would appear in Placerville on December 5, 2020, when Kiehl's newly formed "Hangtown Proud Boys" chapter made its first public appearance, along with Proud Boys who identified themselves as members of the State of Jefferson Proud Boys chapter. ("SOJPB.")¹⁵



State of Jefferson Proud Boy #1 (in yellow)



State of Jefferson Proud Boy #2 (in yellow)

¹⁵ See e.g., "Newly-Apppointed El Dorado County Official Posed With Proud Boys While Dressed As Santa" at <u>https://sacramento.cbslocal.com/2021/02/10/chris-cockrell-proud-boys</u> <u>-el-dorado-county/</u>.



Hangtown Proud Boys and State of Jefferson Proud Boys Placerville, CA - December 5, 2020 NOTE: Circled SOJPBs fought with Sacramento counter-protestors on Nov. 14, 2020



SOJPB #1 Placerville Toys for Tots - Dec. 5, 2020



SOJPB #2 Placerville Toys for Tots - Dec. 5, 2020

B. FREEDOM ANGELS & CONNECTIONS TO EL DORADO COUNTY

Also present were Denise Aguilar and Tara Thornton, co-founders of a group titled "Freedom Angels," along with Denise's husband, Primo Mendez. All three participated in the January 6, 2021 Capitol attack. Though they have not been arrested, there is ample evidence of their presence on the Capitol grounds and within the Capitol. Aguilar confessed to "storming" the Capitol in a personal video.¹⁶



Denise Aguilar (left) - Tara Thornton (right)



Primo Mendez (circled)

¹⁶ See "'We Stormed the Capitol.' California Mamalitia founder boasted of insurrection activity" at <u>https://www.sacbee.com/article251672893.html</u>.



Denise Aguilar Instagram confession "We stormed the Capitol."



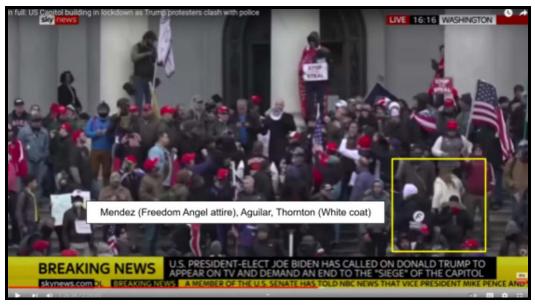
Denise Aguilar "#Insider1791"



Primo Mendez "#Insider2291"¹⁷

¹⁷ See <u>https://seditionhunters.org/seditioninsiders/</u>.

Mendez, Aguilar and Thornton all met at the bottom of the main East Capitol stairs after breaching the building. Mendez was pictured walking away from that area with Proud Boy Ricky Willden. Aguilar and Thornton then posed for a photo on the north stairs leading to the Senate wing of the Capitol, mocking the police.



Mendez, Aguilar and Thornton – ascending the main East Capitol stairs Washington, DC – January 6, 2021



Proud Boy Ricky Willden (left) & Primo Mendez (right)



Denise Aguilar & Tara Thornton East Capitol steps to Senate wing

Aguilar was friends with former commissioner Keeley Link, through Aguilar's groups "Freedom Angels" and "Mamalitia." Aguilar also attended a "Recall Newsom" event with Keeley and Allen Link at the El Dorado County fairgrounds, attended by Supervisor George Turnboo and commissioner Cockrell, among others.



Keeley Link vacated her commission in February, 2022, due to moving out of state. She was replaced by Linda Grimoldi in March, 2022, despite Grimoldi's own links to extremist groups and individuals. The Board Chair, Supervisor Lori Parlin, apologized to Grimoldi for the public's objections to those links.



C.

PROUD BOY EDDIE BLOCK & CONNECTIONS TO EL DORADO COUNTY

Proud Boy Eddie Block filmed Aguilar and Thornton's speech to an assembly of Trump supporters and extremists, including Proud Boys.



Proud Boy Eddie Block filming Denise Aguilar and Denise Thornton

Block *was* a prolific videographer of Proud Boys and "Patriot" events in 2020–2021.¹⁸ However, on April 8, 2022, Block posted a video titled "I'm no longer filming live at political events film rant," that summarized his participation in the Capitol attack, an FBI raid on his home after the attack, having to testify in upcoming insurrectionist trials, and receiving death threats for testifying. (See page 82.)¹⁹

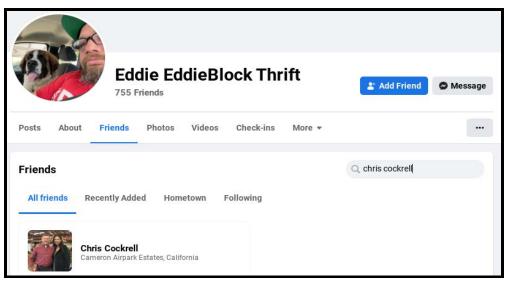
Block's most notable livestream was of the Proud Boys mob that attacked the Capitol, from their gathering at the Washington Monument to their first breach of the Capitol police barriers. (See e.g., pages 51–65.) As a result, Block's home was raided by the FBI in January, 2021, and \$30,000 worth of electronics were seized.²⁰

¹⁸ See e.g, Twitter account at <u>https://twitter.com/eddieblockfilms</u>, and YouTube account at <u>https://www.youtube.com/c/EddieBlockFilms</u>.

¹⁹ See <u>https://www.youtube.com/watch?v=z0Uzd0eMSZA&ab_channel=EddieBlockFilms</u>.

²⁰ See e.g, "Proud Boy confirms FBI search of Madera home. He made \$150 off the Youtube live stream" at <u>https://www.fresnobee.com/news/local/article248718130.html</u>.

Block is friends with El Dorado County commissioner Chris Cockrell. Cockrell was appointed by the El Dorado County Board of Supervisors in February, 2021, despite numerous objections to his participation with Proud Boys at a December 5, 2020 Toys for Tots event in Placerville.²¹



Eddie Block and Commissioner Chris Cockrell friends link



Chris Cockrell as "Santa," flashing Proud Boys "OK" sign With Hangtown Proud Boys chapter president Patrick Kiehl (circled)

²¹ See e.g., "Is 'Hangtown Santa' a Proud Boy? California County argues over political appointee," at <u>https://www.sacbee.com/community/folsom-el-dorado/</u> article249121920.html.

The Hangtown Proud Boys chapter was organized on or about October or November, 2020. Kiehl was previously chapter president of the Sacramento Proud Boys.²²



Proud Boy Patrick Kiehl

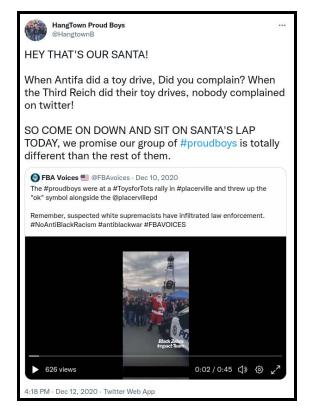
President, Sacramento and Hangtown chapters, Proud Boys International L.L.C.²³

Prior to his appointment, Cockrell denied having any relationship with Proud Boys, but it was later revealed he had an undisclosed connection with Patrick Kiehl, the chapter president of the Hangtown Proud Boys, since at least December 16, 2020.

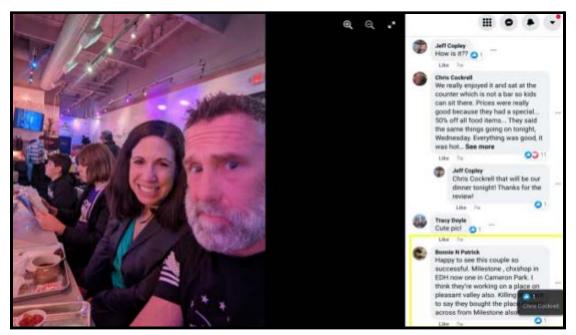
In fact, the Hangtown Proud Boys claimed Cockrell as "our Santa!" on December 12, 2020.²⁴

²² See e.g., <u>https://twitter.com/antifasac_/status/1384970146616381443</u> and <u>https://antifasac.blackblogs.org/2021/04/21/on-blast-patrick-kiehl-hangtown-proud-boys-leader/.</u>
²³ The Proud Boys International, L.L.C. is being sued by the District of Columbia and others for their conspiracy "to commit acts of violence and attack the United States Congress on January 6, 2021." See paragraph 2 of complaint at <u>https://oag.dc.gov/sites/default/files/2021-12/Final-Complaint-.pdf</u>, and news article at <u>https://www.npr.org/2021/12/14/1064144431/d-c-attorney-general-karl-racine-sue-proud-boys-oath-keepers-jan-6-capitol</u>.

²⁴ See <u>https://twitter.com/HangtownB/status/1337914828279541761</u>.



Hangtown Proud Boys tweet - December 12, 2020



Commissioner Chris Cockrell Facebook post - February, 2022 Commented on by Patrick and Bonnie Kiehl account - "Like" by Cockrell

Neither the El Dorado County Board of Supervisors, nor any member of the El Dorado County Veteran Affairs Commission that Cockrell was appointed to, have objected to Cockrell's extremist connections.

The commission chairman, retired Navy Captain John Poimiroo, continues to insist, as of March 28, 2022, that Cockrell has no connections to the Proud Boys. He made those claims, under the El Dorado County seal, to Toys for Tots national representatives in Washington, DC, in support of Cockrell's ongoing contest of his December 5, 2020 Santa appearance with the Hangtown Proud Boys.

"----- Original Message -----From: John Poimiroo [email address redacted]
To: [name and email address redacted]
Cc: [Non-El Dorado County Supervisors and Officials redacted] John Hidhal
<john.hidahl@edcgov.us>, David Livingston <david.livingston@edcgov.us>, Don
Ashton <don.ashton@edcgov.us>, Lori Parlin <bosfour@edcgov.us>, Wendy
Thomas <bosthree@edcgov.us>, George Turnboo <bostwo@edcgov.us>, Sue
Novasel <sue.novasel@edcgov.us>, Chris Cockrell [email address redacted]
Date: 03/28/2022 1:41 PM
Subject: Re: Toys for Tots, December 5th , 2020 , Placerville, California.

[Name redacted]

Chris Cockrell's response restates what I found to be true when El Dorado County Supervisor John Hidahl asked me to investigate the accusations soon after Mr. Cockrell was nominated for appointment to the El Dorado County Veterans Affairs Commission.

I found that Mr. Cockrell had been invited by a representative of Toys for Tots, that Toys for Tots provided him with the Santa suit he wore (as documented within [name redacted] text), and that he attended the event with no purpose other than to portray Santa Claus for Toys for Tots. He had no idea when he was photographed with a group of men at the Placerville event that they were members of the Proud Boys. His only thought was to support Toys for Tots by greeting every child and having his picture taken with anyone who wanted one. As I wrote to Supervisor Hidahl then, "That's what Santa's do."

Mr. Cockrell was not then and has never been a member of or affiliated with the Proud Boys. Because Mr. Cockrell is openly conservative, persons opposed to Mr. Cockrell's appointment to the Commission noted that he'd been photographed with members of the Proud Boys and used "guilt by association" to smear Mr. Cockrell in an attempt to keep him from being appointed to the Commission. They have subsequently continued to slander and libel him, despite evidence that Mr. Cockrell has done nothing wrong.

The true shame is that the U.S. Marine Corps League was implicated in a political witch hunt that aimed to discredit an honorable man who only volunteered to help Toys for Tots. Any U.S. Marine Corps League members who did not live up to the Marine Corps motto and participated in this smear campaign should be cashiered from the League, as they put their own political beliefs ahead of truth, honor and decency.

John Poimiroo, Chairperson (CAPT, USN-Ret) El Dorado County Veterans Affairs Commission [phone number redacted]



TRUMP RALLY SACRAMENTO, CA - NOVEMBER 21, 2020

On November 21, 2020 the Proud Boys held an unpermitted event at the state Capitol. Sacramento police erected a barrier to keep the Proud Boys inside that line, and keep counter-protesters outside the barrier. The Proud Boys later breached that barrier and assaulted counter-protestors at a nearby park.

Eddie Block joined a group of masked Proud Boys harassing a woman they claimed was a journalist for Black Zebra Productions, forcing her to leave the space they were occupying. His comments included, "Eddie Block Films. You can find me all day long. I'm not afraid to show my face, cuz' I'm a real American. We know you're live on Black Zebra right now, so don't try and fake it."²⁵

²⁵ See <u>https://twitter.com/i/status/1330251540129517572</u>; see also Black Zebra Productions at <u>https://www.travelwithblackzebra.com/</u> and <u>https://twitter.com/blackzebrapro</u>.



Eddie Block filming woman being removed from Proud Boys rally

The Proud Boys later marched to nearby Caesar Chavez Plaza, where they violently assaulted counter-protestors. A close up video shows a female counter-protestor punched in the face by two Proud Boys, then forcibly thrown by another Proud Boy into Block's mobility scooter, knocking him to the ground.²⁶



Proud Boys punching a female counter-protestor in the face

²⁶ Block uses a mobility scooter because he is disabled. See assault at <u>https://www.sacbee.com/</u> <u>news/politics-government/election/presidential-election/article247348249.html</u>.



Female counter-protestor thrown into Block's mobility scooter



Block knocked to the ground during Proud Boys brawl

After Block was reseated in his mobility scooter he bragged to other Proud Boys about achieving his fourth degree in the four steps of Proud Boys initiation rites, which is the use of physical violence. He said, "Hey, did you see me get a punch in, though? I got my 4th, motherfucker. I got that black dude."²⁷



Eddie Block celebrating his 4th degree achievement "I got my 4th, motherfucker. I got that black dude."

A. PROUD BOY RICKY WILLDEN

Ricky Willden was filmed interacting with Block, along with a woman who appeared to be Willden's wife.

On October 17, 2020, Willden and a woman accompanying him were filmed at a Los Angeles rally while Willden argued with counter-protestors. That woman wore the same kind of sunglasses and had a similar build as the woman standing with Willden on November 21st.²⁸

²⁷ See <u>https://www.youtube.com/watch?v=GdlzUI3pdzM&t=6273s&ab_channel=</u> EddieBlockFilms.

²⁸ See two videos at <u>https://twitter.com/waterspider</u>/status/1317564324932513792.



Ricky Willden (left) with woman who may be his wife (right) November 21, 2020 - Sacramento, CA





Ricky Willden arguing with counter-protestors October 17, 2020 - Los Angeles, CA

B. RELATED EXTREMISTS

Other attendees were notable for their relationships to the Hangtown Proud Boys, and for making future appearances at Proud Boy rallies in Washington, DC.

1. AARON BATE; HANGTOWN & STATE OF JEFFERSON PROUD BOYS

Related to Patrick Kiehl, chapter president of the Hangtown Proud Boys, were State of Jefferson Proud Boys and Aaron Bate, an El Dorado County resident and founder of the group "Boots on the Ground Cali." ("BOTGC.")



Aaron Bate and Proud Boys group photo - November 21, 2020

In the photo above, Bate and Kiehl are circled in green. Bate, who is disabled, is wearing a shirt and hat with BOTGC images and patches; Kiehl wears a BOTGC patch on the front lower left of his jacket. SOJPB members are circled in yellow.

The red circles show those wearing gloves with hardened knuckles, including Bate, which are illegal under California Penal Code, sections 21710, 21810, 21890 and 18010.²⁹

²⁹ See e.g., <u>https://twitter.com/Borwin10/status/1331302447118131202/photo/4</u>.

Bate is a member of the Three Percenters militia and has relationships with BOTGC members linked to Proud Boys and neo-Nazi individuals and groups.³⁰ Those members include Chelsea Knight, Lindsay Grathwohl, Patrick Kiehl, and Alicia Peterson.³¹

These extremist links were highlighted to the El Dorado County Board of Supervisors ("Board") in April, 2022 because recently appointed Commissioner Linda Grimoldi did not disclose she was a moderator/administrator of BOTGC's Facebook page and a friend of Bate.

Nevertheless, when those relationships were disclosed to the Board they still appointed Grimoldi in a 5-0 vote and continue to support her, despite those unrefuted extremist ties.



BOTGC members with extremist ties Presentation to El Dorado County Board of Supervisors - April, 2022

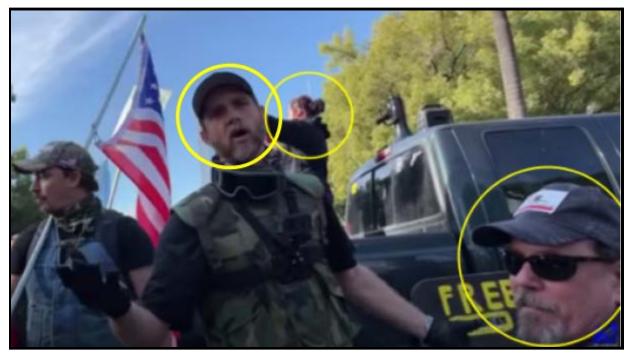
³⁰ See "The Three Percenter Movement and two local members, Aaron Bate and Daniel Seoane," at <u>https://antifasac.blackblogs.org/2020/05/14/the-three-percenter-movement</u> <u>-and-two-local-members-aaron-bate-and-daniel-seoane/</u>.

³¹ See profile of Chelsea Knight's neo-Nazi affiliations at <u>https://borwin10.wordpress.com/</u> 2021/05/26/33/.

The images of Kiehl and Peterson, above, were taken at the November 21, 2020 Trump rally in Sacramento.

Speaking alongside Peterson was Christopher Young, a Proud Boy from Galt, California, described as "a key figure in the weekly right wing rallies taking place in Sacramento. Activated by a completely unfounded conspiracy theory of widespread voter fraud that is supposedly responsible for Joe Biden's victory over Donald Trump in the 2020 election, the far-right has been gathering every Saturday at the Capitol building including Proud Boys, militia members, and white supremacists along with radicalized MAGA die-hards, anti-vaxxers, and Q anon followers. ..."

"Young has taken a lead organizer role providing coordination at these events. ... Standing with him in the back of Young's truck was <u>Proud Boy Jeffrey Perrine</u>, known for shouting that "illegal immigrants should have their heads smashed into the concrete" at a far-right rally in Portland in 2018. Joining Christopher Young and Jeffrey Perrine was <u>Alicia Peterson</u>, a MAGA organizer who is known to have worked with the Golden State Skinheads in her activism."³²



Proud Boy Jeffrey Perrine (left) - Alicia Peterson (center) - Aaron Bate (right) Trump Rally - Sacramento, CA - November 21, 2020

³² See "Christopher Young: Blurring the Lines between Proud Boys, Militias, and Neo-Nazis" at <u>https://nocara.blackblogs.org/2020/12/03/christopher-young-blurring-the-lines-</u> <u>between-proud-boys-militias-and-nazis/</u>. NOTE: Embedded link to Alicia Peterson includes information on Lindsay Grathwohl's extremist ties.



Aaron Bate (left) - Lindsay Grathwohl (right) Trump Rally - Sacramento, CA - November 21, 2020

Bate's ties to Grathwol and Perrine date back to at least 2018, when they organized a far-right rally at the California State Capitol along with Jared Flores, a member of the neo-Nazi group American Guard.³³



³³ See American Guard profile at <u>https://www.adl.org/blog/behind-the-american-guard-hardcore-white-supremacists</u>.

Bate also participated in Perrine's 2019 "Family, Faith, And Freedom" rally at the State Capitol, where he showed off his large III% tattoo.³⁴ Bate continues to socialize with local Proud Boys and their supporters in 2022, including Linda Martinez-Hanna, below.



Aaron Bate - III% tattoo - July 20, 2019



Aaron Bate (center) with State of Jefferson Proud Boy (right) & Linda Hanna (left) Apple Bistro Cafe - Placerville, CA - January, 2022

³⁴ See <u>https://twitter.com/LCRWnews/status/1152647822400823296</u>.

2. POTENTIAL LINKS TO THE CAPITOL INSURRECTION

There are multiple potential links to the January 6, 2021 Capitol attack among the preceding persons. For instance, Proud Boy Jeffrey Perrine and other local Proud Boys attended Proud Boy rallies in Washington, DC in December, 2020, along with Linda Martinez Hanna, who was also in Washington, DC on January 6, 2021 with Proud Boy Eddie Block. (See page 51.)

Prior to January 6, 2021 Willden sought donations to "[a]ssist 13 Proud Boys from the West Coast with travel and other related expenses." Willden wrote, "It is imperative we make a stand in Washington DC on January 6, 2021, **through January 21, 2021**." (emphasis added.)³⁵



Those kinds of activities that Willden supported were cited among the "manner and means" of the conspiracy that Proud Boys engaged in to plan and carry out the Capitol attack.³⁶

³⁶ See e.g., paragraph 28(a)-(e) of superseding indictment at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1480986/download</u>.

³⁵ See <u>https://twitter.com/Borwin10/status/1387084709197271043/photo/2</u>.

Lindsay Grathwohl was in Washington, DC on January 6, 2021 though it has not been confirmed that she participated in the Capitol attack. Her Telegram posts imply that she did.³⁷



Lindsay Grathwohl - Washington, DC - January 6, 2021

Alicia Peterson lives in Idaho but maintains connections to El Dorado County, including as a moderator/administrator of the BOTGC Facebook page.

Peterson maintains extremist links in Idaho,³⁸ including with Pam Hemphill (#IAmPamHemphill), a Boise woman who pleaded guilty to parading, demonstrating, or picketing in a Capitol building. "[Hemphill] boasted that she had been in the Capitol building and "was the first one behind the gate." "³⁹

Peterson's California history includes protests with Bate and Proud Boys, including Jeffrey Perrine and Marcos Santos. Santos participated in the Capitol attack but has not yet been arrested or charged.

³⁹ See Hemphill's statement of offense at <u>https://www.justice.gov/usao-dc/</u> <u>case-multi-defendant/file/1469486/download</u>, and plea agreement at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1469481/download</u>.

³⁷ See <u>https://twitter.com/berkeleyantifa/status/1351579121172705281/photo/1</u>.

³⁸ See e.g., <u>https://redoubtafa.noblogs.org/post/2022/01/09/neo-nazi-and-blm-event</u> -organizer-alicia-peterson/.



Boots on the Ground Cali rally Left-right: Aaron Bate, BOTGC founder - Proud Boy Jeffrey Perrine -Alicia Peterson - Proud Boy Marcos Santos

Proud Boy Marcos Santos (#FleshTunnelsPB), pictured above, was a member of the Sacramento Proud Boys, along with chapter president Patrick Kiehl, but now reportedly lives in Montana. Santos participated in the January 6th Capitol attack.⁴⁰



Proud Boys Marcos Santos, Patrick Kiehl - Sacramento, CA

⁴⁰ See e.g., <u>https://jan6attack.com/individuals/fleshtunnelspb/index.htm;</u> <u>https://detrumpify.org/person.php?ID=2548</u>.



Proud Boy Marcos Santos (foreground) - Washington, DC - January, 6, 2021 With Proud Boys leaders Ethan Norden (left), Zachary Rehl (right) NOTE: The yellow object on his waist was reported to be a taser



Pam Hemphill with Proud Boys Leaders - Washington, DC - January 6, 2021 Left-Right: Ethan Nordean, Joseph Biggs, Zachary Rehl

TRUMP RALLY SACRAMENTO, CA - DECEMBER 5, 2020

Trump supporters and Proud Boys continued their election protests at the California State Capitol on December 5, 2020, where the Sacramento Police Department noted that protestors and counter-protestors "were becoming increasingly antagonistic."⁴¹

Among the Proud Boys clashing with counter-protestors were Richard and Cosmin Merca, brothers who are reported to be members of the State of Jeffererson chapter.

Cosmin, dressed in a Santa Claus jacket covered by a tactical vest, used bear spray and brandished a large knife to protect himself as he and Richard retreated from counter-protestors.⁴²



Cosmin (left) and Richard Merca (right) Trump Rally - Sacramento, CA - December 5, 2020

⁴¹ See <u>https://www.sacbee.com/news/local/article247631330.html</u>.

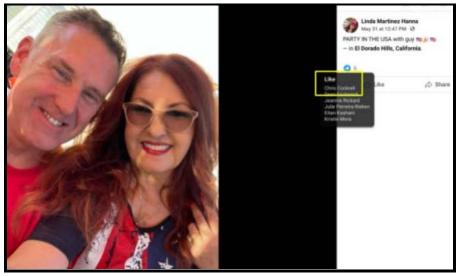
⁴² See <u>https://abc7news.com/trump-supporter-state-capitol-proud-boys-santa-suit-anti-fascist-groups/8540155/; https://twitter.com/Borwin10/status/1432110034549346309/photo/3</u>.



Proud Boys Richard (left) & Cosmin Merca (right) Trump Rally - Sacramento, CA - December 5, 2020

A. PROUD BOY COSMIN MERCA & CONNECTIONS TO EL DORADO COUNTY

On Memorial Day weekend, 2021, El Dorado County Veteran Affairs Commissioner Chris Cockrell was photographed at a party hosted by Greg and Linda Martinez-Hanna ("Hanna") at their El Dorado Hills home. Also in attendance were Proud Boys Cosmin Merca and Jeffrey Perrine.



Commissioner Chris Cockrell (left) - Linda Hanna (right) Hanna Party - May, 2021 (Facebook post "Like" by Cockrell)



Proud Boy Jeffrey Perrine (left) - Linda Hanna (right) Hanna Party - May, 2021



Proud Boy Cosmin Merca Photo taken March, 2021⁴³



Merca at Linda Hanna Party Posted May 31, 2021

⁴³ The photo shows Merca alongside Victor and Chelsea Knight at a local "MAGA Wedding." See footnote 31 and <u>https://twitter.com/Borwin10/status/1397761803073908745/photo/3</u>.

Hanna was an active member of Latinos for Trump and attended many of the 2020 Trump rallies in Sacramento.⁴⁴ She was photographed with her "ONE and ONLY My Good Friend Eddie Block," Jeffrey Perrine, Lindsay Grathwohl, Denise Aguilar, Aaron Bate, and other extremists.



Linda Hanna (right) with Proud Boy Eddie Block (left) Trump Rally - Sacramento, CA - November, 2020



Linda Hanna (center) with Primo Mendez (left) and Denise Aguilar (right) Trump Rally - Sacramento, CA - November, 2020

⁴⁴ See e.g., " 'Disowned by family,' for her politics, why this Latina supports Donald Trump's reelection," at <u>https://www.sacbee.com/news/politics-government/article246566258.html</u>.



Linda Hanna (foreground) With (left to right) Proud Boy Jeffrey Perrine, Lindsay Grathwohl, unidentified woman, Aaron Bate Trump Rally - Sacramento, CA - November, 2020



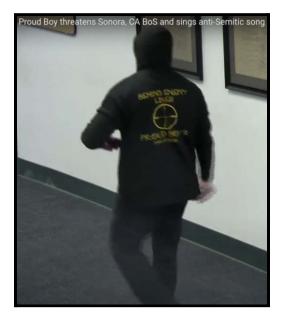
Linda Hanna (foreground) With (left to right) Proud Boys Sean Kuykendall (Leader, Central Valley Proud Boys chapter), unidentified Modesto area Proud Boy, Proud Boy Jeffrey Perrine Trump Rally - Sacramento, CA - November, 2020



Proud Boy Sean Kuykendall (center) with Proud Boy Christopher Young (right)

On November 16, 2021 a Proud Boy wearing a "Hangtown" shirt addressed the Tuolumne County Board of Supervisors. He identified himself as "James Kent, 35, of Placerville," though there was a consensus he was Sean Kuykendall. When asked about the word "Hangtown" on his shirt, he equated it to the city of Placerville.⁴⁵





Proud Boy "James Kent" - Tuolumne County Board of Supervisors - Nov., 16, 2021

⁴⁵ See <u>https://www.pressreader.com/usa/the-union-democrat/20211117/281767042475402</u>, and video at <u>https://www.youtube.com/watch?v=JTypmoMLzyo&ab_channel=</u> <u>UncoveredHateintheCentralValley</u>.

PROUD BOYS IN WASHINGTON, DC DECEMBER, 2020

In December, 2020 local Proud Boys joined nationwide gatherings of the organization in Washington, DC, often filmed by Eddie Block.

A. PROUD BOY JEFFREY PERRINE; MODESTO AREA PROUD BOY

On December 11, 2020 Block filmed a Proud Boys march in Washington, DC. Among the marchers were Jeffrey Perrine and an unidentified Proud Boy believed to be from the Modesto area, and who may be a former Marine.⁴⁶

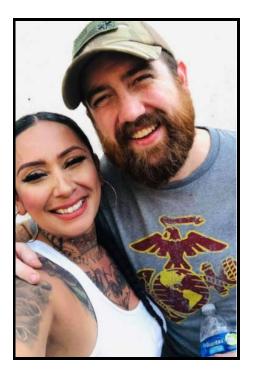


Jeffrey Perrine (right) and unidentified Modesto area Proud Boy (left) Washington, DC - December 11, 2020

⁴⁶ See <u>https://www.youtube.com/watch?v=aIz3Z4xS3NI&ab__channel=EddieBlockFilms</u>.



Modesto area Proud Boy Washington, DC - Dec. 11, 2020



Modesto area Proud Boy with Denise Aguilar - Posted Sept. 30, 2020

B. PROUD BOY COSMIN MERCA & HANGTOWN PROUD BOY

On December 12, 2020 Block filmed a large Proud Boys march in downtown Washington, DC.⁴⁷ Cosmin Merca, and an unidentified Proud Boy wearing a Hangtown Proud Boys sweatshirt, marched together in the parade and were photographed with an unidentified woman believed to be from the Sacramento area.

The Hangtown Proud Boys attire was notable as that chapter had only made its public debut one week earlier, in Placerville, on December 5, 2020. The wearer is believed to be a member of the State of Jefferson Proud Boys chapter.

⁴⁷ See e.g., <u>https://www.washingtonpost.com/local/trump-dc-rally-maga/2020/12/11/8b5af818-3bdb-11eb-bc68-96af0daae728_story.html; and https://www.youtube.com/watch?v=8cGSX0z70Lk&t=344s&ab_channel=EddieBlockFilms.</u>



Proud Boy Eddie Block filming large Proud Boys march Washington, DC - December 12, 2020

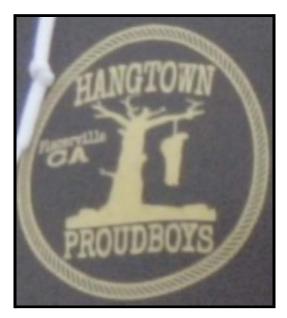


Proud Boy Cosmin Merca (left) with Hangtown Proud Boy (right) Washington, DC Proud Boy March - December 12, 2020



Hangtown Proud Boy - Washington DC Proud Boy March - December 12, 2020

The Hangtown Proud Boys logo is of a person hanging from a tree by a noose, with the words "Placerville CA" to the side. Placerville's "nickname" is "Old Hangtown," a divisive nod to a Gold Rush era hanging that predated the town's incorporation.

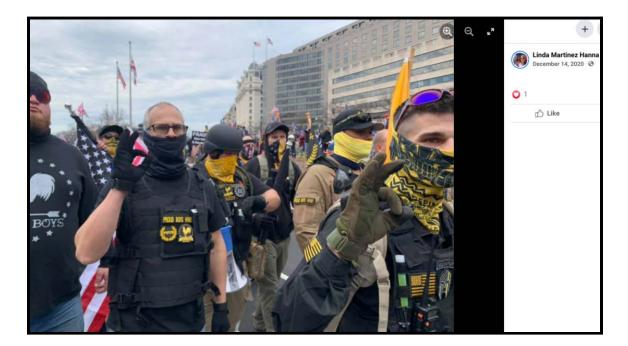




Hangtown Proud Boys logo - December 5, 2020

C. EXTREMIST SUPPORTER LINDA HANNA

Linda Hanna of El Dorado Hills, whose friendship with Commissioner Chris Cockrell would become known in May, 2021, was also present in Washington, DC on December 12, 2020. She posted multiple photographs with Proud Boys at the conclusion of their march through downtown Washington, DC.





Linda Hanna Proud Boys March photos - Freedom Plaza - Washington, DC



Linda Hanna (foreground) with unidentified Proud Boys Freedom Plaza - Washington, DC - December 12, 2020⁴⁸

D. PROUD BOY RICKY WILLDEN

On the afternoon of December 12, 2020 Ricky Willden joined Block on the National Mall; Block's comments suggested he and Willden were staying at the same hotel.

As Willden and Block were walking towards their hotel, Block briefly interacted with the unidentified Hangtown Proud Boy who had marched with Proud Boy Cosmin Merca earlier that day.

The Hangtown Proud Boy was accompanied by another unidentified Proud Boy; Block referred to them as the "main security." Block had filmed the two acting as such during an early morning Proud Boy rally at Washington's National Sylvan Theater.⁴⁹

⁴⁸ Proud Boys clashed with counter-protestors that evening amid a sizeable police presence to keep the groups separated. See e.g., <u>https://www.local10.com/news/politics/2020/12/12/</u> <u>trump-loyalists-converging-again-on-washington-over-election/</u>.

⁴⁹ See <u>https://www.youtube.com/watch?v=FfXDRZXb7SY&ab_channel=EddieBlockFilms;</u> Sylvan Theater information at <u>https://en.wikipedia.org/wiki/National_Sylvan_Theater</u>.

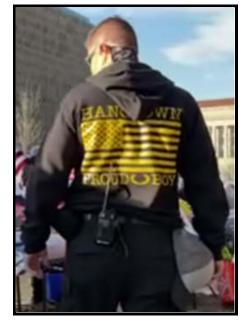


Ricky Willden - Washington, DC - December 12, 2020



Unidentified Proud Boy (left) - Hangtown Proud Boy (right) Washington, DC - December 12, 2020





Unidentified PB & Hangtown PB Acting as "Main Security" at the National Sylvan Theater.

Hangtown Proud Boy, with unidentified Proud Boy along 14th Street NW, north of Madison Drive NW.

NATIONAL INSURRECTION - JANUARY 6, 2021

The Capitol attack was planned and carried out by a nationwide group of Proud Boys, in concert with others. The purpose of their conspiracy "was to stop, delay, and hinder the Certification of the Electoral College vote" by Congress.⁵⁰

The Proud Boys "knew and understood ... [they] would resort to unlawful conduct to achieve [their] objective," that "storming the Capitol would be illegal," and it was "reasonably forseeable ... that members of the Proud Boys who had been led to the Capitol ... would engage in assaults on law enforcement."⁵¹

"The attack on the Capitol resulted in substantial damage, requiring the expenditure of more than \$1.4 million dollars for repairs."⁵²

⁵⁰ See <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1480986/download</u>, paragraphs 26-107.

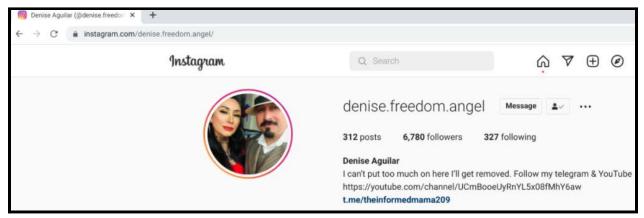
⁵¹ See <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492996/download,</u> paragraphs 6, 17, 37.

 $^{^{52}}$ Id., paragraph 47.

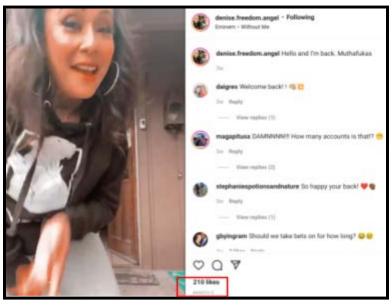
A. CONNECTIONS TO EL DORADO COUNTY

There are multiple connections between the national insurrection and El Dorado County, both direct and indirect. For example, commissioners Cockrell and Link never disclosed their relationships with the Proud Boys, Denise Aguilar, and Tara Thornton.

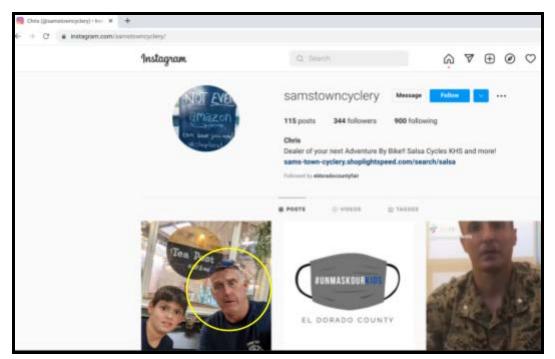
Those relationships preceded the commissioner's 2021 appointments and continue unabated, such as commissioner Cockrell following an Instagram account of insurrectionist Denise Aguilar that first posted on March 5, 2022.



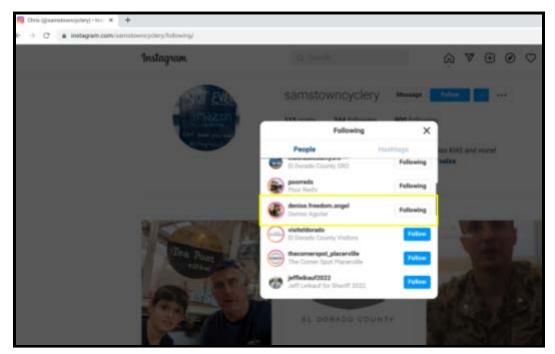
Denise Aguilar Instagram account - showing Aguilar and Primo Mendez



Denise Aguilar Instagram post - March 5, 2022 "Hello and I'm back. Muthafuckas"



Commissioner Chris Cockrell's business Instagram account Cockrell (circled, bottom left) - March, 2022



Commissioner Chris Cockrell's business Instagram account Following Denise Aguilar Instagram account - March, 2022

Indirectly, other known insurrectionists such as Proud Boys Ricky Willden and Eddie Block, Veterans for Trump organizers Josh Macias (#IAmJoshuaMacias) and Antonio Lamotta (#IAmAntonioLaMotta), and Jorge Riley of Sacramento (#JorgeRiley) have their own links to extremists who are connected to commissioners Cockrell, Link, and Grimoldi.

For example, Jorge Riley was arrested on January 19, 2021. His indictment includes one count to "corruptly obstruct, influence and impede an official ... proceeding before Congress, by entering and remaining in the United States Capitol without authority"⁵³

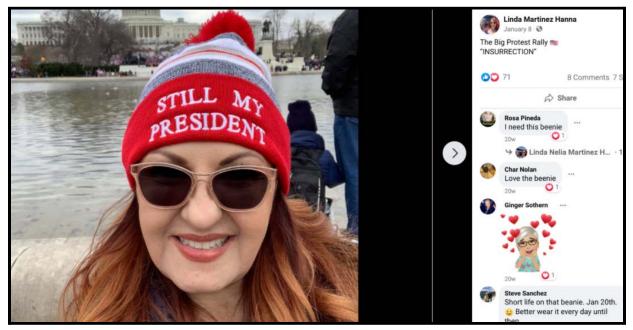
Riley continues to be friends with Linda Hanna, as illustrated by his attending a July 4, 2021 party at her El Dorado Hills home.



Linda Hanna (foreground) with Jorge Riley (circled) - July 4, 2021

⁵³ See Riley statement of facts at <u>https://www.justice.gov/opa/page/file/1357041/download</u>, and indictment at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1366116/download</u>. See also "Former Sacramento Republican Leader Publicly Brags About Involvement in Capitol Riot At Recall Newsom Event," with Proud Boy Jeffrey Perrine and Josh Fulfer, at <u>https://sacramento.cbslocal.com/2021/03/09/jorge-riley-capitol-riot-recall -newsom-event/</u>.

Hanna also pictured herself near the Capitol on January 6, 2021, wearing a hat with the words, "Still My President." Her Facebook post says "The Big Protest Rally "INSURRECTION"."



Linda Hanna "INSURRECTION" Facebook post - January 6, 2021

B. THE PROUD BOYS MARCH ON THE CAPITOL

On April 8, 2022 Proud Boy Charles Donohoe, a former Marine and Proud Boys chapter president from North Carolina, pled guilty to two felony charges in exchange for a plea deal that includes his cooperation with ongoing government investigations into the Capitol attack.⁵⁴

The facts of the Proud Boys' role in planning and carrying out the Capitol attack are no longer in dispute, owing to Donohoe's plea deal and those of other Proud Boys like Rickey Willden, Matthew Greene of New York,⁵⁵ and Jeffrey Finley, a chapter president from West Virginia.⁵⁶

⁵⁴ See Dept. of Justice press release at <u>https://www.justice.gov/opa/pr/leader-north-carolina</u> <u>-chapter-proud-boys-pleads-guilty-conspiracy-and-assault-charges-jan-6</u>, and Statement

of Offense at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492996/download</u>. ⁵⁵ See Statement of Offense at https://www.justice.gov/usao-dc/defendants/greene-matthew.

⁵⁶ See Statement of Offense at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/</u> 1492396/download.

The legality of that conspiracy is also no longer in dispute, owing to the same Proud Boys pleas, and the March 28, 2022 opinion of a federal district judge, who rejected blanket claims of attorney-client privilege between former President Donald Trump and attorney John Eastman. The judge wrote, in part,

"The illegality of the plan was obvious. Our nation was founded on the peaceful transition of power, epitomized by George Washington laying down his sword to make way for democratic elections. Ignoring this history, President Trump vigorously campaigned for the Vice President to single-handedly determine the results of the 2020 election. As Vice President Pence stated, "no Vice President in American history has ever asserted such authority." Every American—and certainly the President of the United States—knows that in a democracy, leaders are elected, not installed. With a plan this "BOLD," President Trump knowingly tried to subvert this fundamental principle. Based on the evidence, the Court finds it more likely than not that President Trump corruptly attempted to obstruct the Joint Session of Congress on January 6, 2021."⁵⁷ (emphasis added.)

The court concluded with a plea for investigation and accountability, in "fear[] January 6 [2021] will repeat itself."

"Dr. Eastman and President Trump launched a campaign to overturn a democratic election, an action unprecedented in American history. Their campaign was not confined to the ivory tower—it was a coup in search of a legal theory. The plan spurred violent attacks on the seat of our nation's government, led to the deaths of several law enforcement officers, and deepened public distrust in our political process. ...

If Dr. Eastman and President Trump's plan had worked, it would have permanently ended the peaceful transition of power, undermining American democracy and the Constitution. **If the country does not commit to investigating and pursuing accountability for those responsible, the Court fears January 6 will repeat itself**."⁵⁸ (emphasis added.)

⁵⁷ See ruling at <u>https://www.courtlistener.com/docket/62613089/260/john-c-eastman-v-bennie-g-thompson/</u>.

⁵⁸ Ibid.

1. PROUD BOY EDDIE BLOCK'S PARTICIPATION

According to the Department of Justice, Proud Boys insurrectionist Charles Donohoe was aware, at least by January 4, 2022, that Proud Boys leaders "were discussing the possibility of storming the Capitol. Donohoe believed that storming the Capitol would achieve the group's goal of stopping the government from carrying out the transfer of presidential power. Donohoe understood from discussions that the Proud Boys would pursue their objective through the use of force and violence."

"On Jan. 6, 2021, Donohoe was part of a group of 100 or more Proud Boys who marched away from a rally near the Washington Monument towards the Capitol. Shortly after 12 p.m., the group was assembled two blocks west of the Capitol, and Donohoe understood that other Proud Boys leaders were searching for an opportunity to storm the Capitol."⁵⁹

Proud Boy Eddie Block livestreamed the entire Proud Boys march, from the Washington Monument until the start of the first breach of the Capitol police barriers.⁶⁰ Beforehand, Block was met by Linda Hanna, who was livestreaming her own video of the day's events.



Proud Boy Eddie Block - Linda Hanna livestream - January 6, 2021

 ⁵⁹ See Dept. of Justice press release at <u>https://www.justice.gov/opa/pr/leader-north-carolina</u> <u>-chapter-proud-boys-pleads-guilty-conspiracy-and-assault-charges-jan-6</u>.
 ⁶⁰ See e.g., " 'Tear gas everywhere': CA Proud Boys video of US Capitol riot could be used as evidence against group" at <u>https://abc7news.com/proud-boys-founder-fbi-wanted</u> <u>-capitol-riot/9481512/</u>.



Block gathering with Proud Boys at Washington Monument



Proud Boys view of U.S. Capitol from Washington Monument

The Proud Boy circled above is Dominic Pezzola of New York, another former Marine like Donohoe. Pezzola is notable for stealing a police shield and using it to destroy a window at the Capitol, indicated by the yellow arrow. That prong of the Proud Boys attack was the first breach of the Capitol building, allowing hundreds of insurrectionists to begin occupying the building in order to obstruct Congressional proceedings to certify the 2020 Presidential election results.⁶¹

⁶¹ See paragraphs 1, 16, 20, 38, and 44 of Donohoe's statement of offense, at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492996/download</u>.



Block and Proud Boys departing Washington Monument towards U.S. Capitol Circled leaders: Zachary Rehl (left), Joe Biggs (center) and Ethan Nordean (right)

Block, as pictured above, would remain front and center of the Proud Boys as they marched upon the Capitol and led the Capitol attack. The leaders circled above are Donohoe's co-defendants: former Marine Zachary Rehl of Pennsylvania, former Army sergeant Joseph Biggs of Florida, and Ethan Nordean of Washington.

Donohoe, Biggs, Nordean and Rehl were leaders of a specifically formed Proud Boys chapter titled the "Ministry of Self–Defense" ("MOSD"), formed on or before December 20, 2020. Immediately after the MOSD was formed the group began preparations for the Proud Boys to rally in Washington, DC on January 6, 2021. "Donohoe understood that the purpose of the rally … was to stop the certification of the Electoral College vote."

On January 2, 2021, an "MOSD Members Group" was formed that comprised at least 65 members, including Donohoe, Rehl, Biggs and Nordean. The group was reformed on January 4, 2021 with at least 90 members. Donohoe's role included posting encrypted messages to meet at the Washington Monument at 10 a.m. on January 6th, where he coordinated the assembly until Nordean and Rehl arrived.⁶² Block was part of that Proud Boys assembly.

⁶² See Donohoe's statement of offense at <u>https://www.justice.gov/usao-dc/</u> <u>case-multi-defendant/file/1492996/download</u>.



Block, smiling, in Proud Boys group photo - East front of the U.S. Capitol

The Proud Boys marched around the restricted Capitol perimeter to the east front of the Capitol, where they posed for a dramatic group photo, seen below.

Block's participation in the Proud Boys march and Capitol attack were the basis for documenting El Dorado County's direct link to those events, through commissioner Chris Cockrell's undisclosed friendship with Block.



Presentation slide to El Dorado County Board of Supervisors - 2022

After taking their group photo, above, the Proud Boys marched past the Supreme Court, then along Constitution Avenue to a point just northwest of the Capitol. They regrouped there before leading the first breach of the Capitol's restricted perimeter, in which they became the physical institution of a national insurrection.



Block filming Proud Boys march proceeding on Constitution Avenue NW Circled leaders: Rehl (left), Biggs (center), Nordean (right)

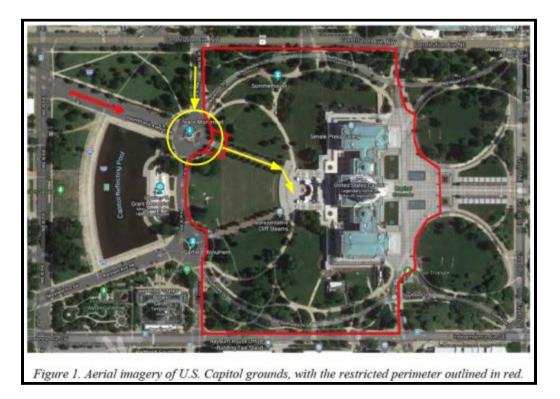


Block filming the Proud Boys final formation before their initial breach of the Capitol's restricted perimeter Circled leaders: Rehl (left), Donohoe (arrow), Biggs (center), Norden (right)

C. THE PROUD BOYS BREACH OF THE CAPITOL'S RESTRICTED PERIMETER

"The United States Capitol ... is secured twenty-four hours a day by United States Capitol Police. Restrictions around the Capitol include permanent and temporary security barriers and posts manned by Capitol Police. Only authorized people with appropriate identification are allowed access inside the Capitol."

"On January 6, 2021, the exterior plaza of the Capitol was closed to members of the public as the Joint Session of Congress convened inside the building. ... [T]emporary and permanent barricades were in place around the exterior of the Capitol, and Capitol Police were present and attempting to keep the crowd away from the Capitol and the proceedings underway inside."⁶³



The image above shows the perimeter of the Capitol's restricted area on January 6, 2021.⁶⁴ The yellow arrows show the final path of the Proud Boys to the NW pedestrian entrance (circled area), and the initial path taken by all insurrectionists after the restricted area was breached.

⁶³ See paragraphs 31-33 of Donohoe's statement of offense at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492996/download</u>.

⁶⁴ See <u>https://www.justice.gov/opa/page/file/1362781/download</u>.

"Shortly before 12:53 p.m., Nordean and Biggs led the group back to the First Street pedestrian entrance near the Peace Monument. Donohoe observed that at least one other large group appeared to arrive at that location at the same time. Donohoe immediately noticed that the crowd had become more aggressive."⁶⁵



Proud Boys at NW pedestrian entrance with public crowd Circled leaders: Biggs (left), Rehl (right)



Proud Boys at NW pedestrian entrance, flashing group's "OK" sign (circled)

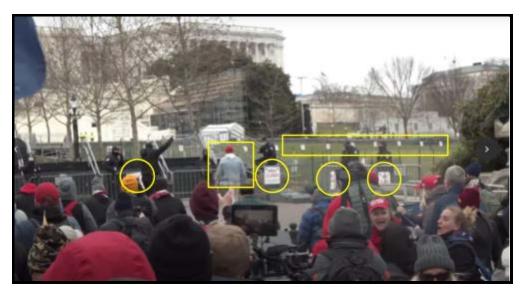
⁶⁵ See paragraph 34 of Donohoe's statement of offense at <u>https://www.justice.gov/</u><u>usao-dc/case-multi-defendant/file/1492996/download</u>.

Among the gathering crowd was Ryan Samsel of New York, "an individual whose identity is known to the grand jury [that indicted the Proud Boys leaders.] The individual put one arm around [Bigg's] shoulder and spoke to him."⁶⁶



Proud Boy Joe Biggs (left), Ryan Samsel (right)

"Approximately one minute later, this individual crossed the barrier that restricted access to the Capitol grounds. This was the first barrier protecting the Capitol grounds to be breached on January 6, 2021, and the point of entry for [Proud Boys] Nordean, Biggs, Rehl, Donohoe, and Pezzola."⁶⁷



Samsel advancing on restricted barrier, marked by prominent "Area Closed" signs

 ⁶⁶ See paragraph 76 of superseding indictment at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1480986/download</u>.
 ⁶⁷ Ibid.

"Donohoe recognized that the handful of officers who were guarding the Capitol were severely outnumbered. Donohoe knew that the crowd was not permitted to advance past the metal barriers. ... Donohoe saw Nordean and Biggs advance onto Capitol grounds and followed them. Donohoe believed these actions were intended to stop the certification of the Electoral College vote."⁶⁸



Outnumbered Capitol police officers - NW pedestrian walkway



Proud Boy William Chrestman (circled) leading the Capitol attack⁶⁹

⁶⁸ See paragraphs 34-35 of Donohoe's statement of offense at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492996/download</u>.

⁶⁹ See paragraphs 26-27 of Chrestman's complaint and affidavit at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1366441/download</u>.



Proud Boys and insurrectionists flooding restricted area after breach



Proud Boys leading insurrectionist charge on the U.S. Capitol Circled: #TrackSuitPB, Rehl, Chrestman, Felicia Konold⁷⁰

NOTE: Chrestman is an Army veteran and president of the Kansas City, Kansas Proud Boys chapter.

⁷⁰ See paragraphs 17, 27-28 of complaint and affidavit at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1366446/download</u>.

Biggs "recorded himself stating, "Dude, we're right in front of the Capitol right now. American citizens are storming the Capitol-taking it back right now. There's millions of people out here; this is fucking crazy. Oh my God! This is such history! This is insane. We've gone through every barrier thus far. Fuck you!" "71



Proud Boys following lead insurrectionists (left to right) Matthew Greene, Biggs, Jeffrey Finley, Nordean



Biggs celebrating "American citizens ... storming the Capitol"

⁷¹ See paragraph 79 of superseding indictment at <u>https://www.justice.gov/usao-dc/</u> <u>case-multi-defendant/file/1481016/download</u>.

1. PROUD BOY EDDIE BLOCK'S BREACH PATHWAY

Proud Boy Eddie Block's livestream showed him initially joining the perimeter breach on the NW pedestrian walkway. His mobility scooter was quickly overwhelmed by the crowd, forcing him to take an alternate path on the adjacent grass. He shouted, "We're storming the Capitol with the Proud Boys!," among other excited comments as the attack began.



Block's mobility scooter path on grassy area (arrows) Note Restricted perimeter marked by fencing and "Area Closed" signs





End of Proud Boy Eddie Block livestream "We're storming the Capitol!"

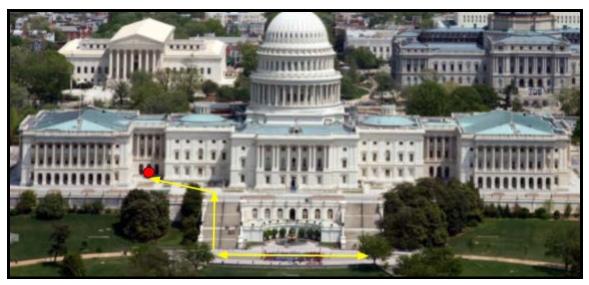


Block was accompanied by other Proud Boys along the path he took to the Capitol. In order to reach the Capitol's lower west terrace, above, Block had Proud Boys help to scale a short wall and navigate among the growing crowd of insurrectionists.

Block continued to move forward despite stairs and other obstacles, including an insurrectionist mob committing violent assaults against police officers.

D. THE PROUD BOYS BREACH OF THE CAPITOL BUILDING

Upon arriving on the Capitol's lower west terrace the Proud Boys positioned themselves at or near the front of the crowd. Biggs took a video there, announcing "we've just taken the Capitol." Approximately thirty minutes later Biggs took another video with others and said, "So we just stormed the fucking Capitol. Took the motherfucking place back. That was so much fun. ... January 6 will be a day in infamy."⁷²



Path of Proud Boys Capitol Breach - Lower West Terrace to Senate Wing

The first breach of the Capitol building was carried out by Proud Boy Dominic Pezzola (#Spazzo), a former Marine from New York. The path he took from the base of the lower west terrace to the breach of the Senate wing is shown above.

Pezzola stole a police shield on the lower terrace, then fought officers on his way up a long set of stairs covered by scaffolding. Pezzola and others then rushed the Capitol building, where Pezzola broke a window with the stolen police shield, initiating the breach of the Capitol that obstructed Congress' certification of the 2020 Presidential election.⁷³

⁷² See paragraphs 83-84, 89 of superseding indictment at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1481016/download</u>.

⁷³ *Id.*, paragraphs 86–88, 90–94; see also paragraphs 38–40 of Donohoe's statement of offense at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492996/download</u>; see also <u>https://jan6attack.com/individuals/spazzo/index.htm</u>.



Proud Boy Dominic Pezzola smashing window to breach the U.S. Capitol building

1. BREACH OF THE WEST CAPITOL STAIRS

Police reinforcements quickly stalled insurrectionists from advancing past the lower west terrace of the Capitol. During that time the Proud Boys looked for other routes to breach the Capitol and largely gathered near the base of a set of stairs leading to the upper west plaza, where Pezzola would breach the Capitol building.



Proud Boys at base of West Terrace stairs Circled: Donohoe (#YutYutPB), Daniel Scott (#MilkshakePB)

"Upon arriving near the base of a set of concrete stairs, Donohoe recognized a Proud Boys member known as "Milkshake" at the front of the crowd standing opposite a line of officers."⁷⁴ Donohoe's fellow Proud Boy was Daniel Scott of Florida, who had joined Proud Boys Tarrio, Biggs, Block, and Willden in Portland, Oregon on September 26, 2020. (See pages 4-6.)



Donohoe (circled) and Scott (arrow) at base of scaffolled covered stairway



Proud Boys Pezzola (left, with police shield), Matthew Greene (right) Observing from lower west terrace

⁷⁴ See paragraph 39 of Donohoe's statement of offense, at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492996/download</u>.

"After Milkshake initiated an altercation at the front of the crowd, Donohoe pushed forward to advance up the concrete stairs toward the Capitol. The crowd overwhelmed law enforcement who were attempting to stop their advance."⁷⁵



Proud Boy Daniel Scott (aka #Milkshake) initiating breach of Capitol stairway

Among the Proud Boys behind Scott was Barry Ramey of Florida (#ChudChadPB), who was arrested on April 21, 2022 as part of ongoing investigations. Ramey was identified by "multiple confidential human sources [and] was listed on a master list of Proud Boys members in Southern Florida."

Ramey, along with Scott, was instrumental in the stairway breach. While standing alongside Donohoe, Ramey sprayed irritants into the eyes and face of two Capitol police officers, impairing their vision and causing them to be disoriented.⁷⁶

Ramey's assault opened a pathway between the assaulted officers that he and other Proud Boys rushed through, including Pezzola, Matthew Greene, and Donohoe.

⁷⁵ *Id.*, paragraphs 40-43.

⁷⁶ See Ramey's statement of facts at <u>https://www.justice.gov/usao-dc/case-multi-defendant/</u> <u>file/1496006/download</u>; see also <u>https://jan6attack.com/individuals/chudchadpb/index.htm</u>; <u>https://seditiontracker.com/suspects/barry-ramey.html</u>.



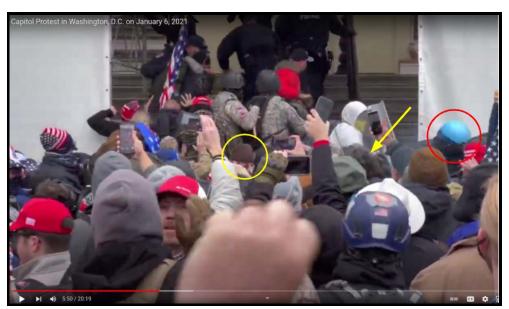
Assaults on officers - Stairway to Upper West Terrace Proud Boys Scott (top yellow circle), Donohoe (lower yellow circle) Officer assaulted by Scott (red arrow); Officers assaulted by Ramey (red circles)



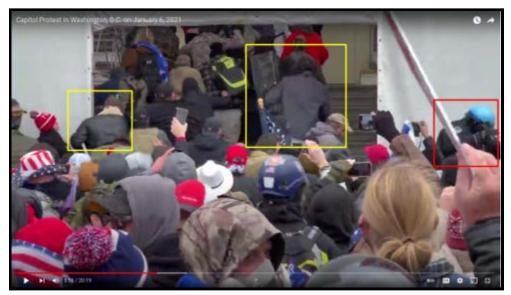
Ramey's assault on officers Scott (left), Ramey (center-spraying officers), Donohoe (right)⁷⁷

⁷⁷ See video of Ramey's assault on officers at <u>https://www.youtube.com/watch?v=</u> <u>9mt8YGpJ5vs&t=344s&ab_channel=hyperbole</u>, starting at time 5:34.

Ramey's spray assault on two officers at the same time as Scott's physical assault cleared a space that insurrectionists wedged through. Pezzola, carrying the stolen police shield, rushed straight ahead while Donohoe veered left and around the corner of the scaffolding opening.⁷⁸



Stairwell breach - Donohoe (left), Pezzola (center, arrow), Assaulted Officer (right)

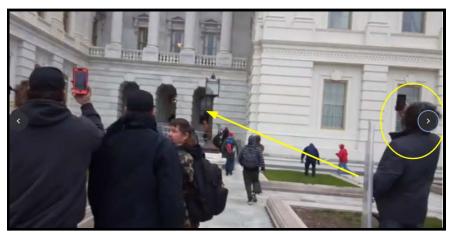


Stairwell breach - Donohoe (left), Pezzola (center), Assaulted Officer (right)

⁷⁸ Ibid.

2. **BREACH OF THE CAPITOL BUILDING**

"At the top of the flight of stairs leading from the west plaza to the Capitol, [Pezzola] shouted at Capitol police officers attempting to prevent the crowd from advancing further, words to the effect of, "We ain't stopping! We ain't fucking stopping! Fuck you! ... among other things." "79



Pezzola (right) taking photo of eventual breach point (end of arrow)

"At approximately 2:13 p.m., [Pezzola] used the riot shield he had taken from a Capitol Police officer to break a window of the Capitol. The first members of the mob entered the Capitol through this broken window. ... Other members of the mob entered the building and forced open an adjacent door from the inside."80



⁷⁹ See paragraph 92 of superseding indictment at <u>https://www.justice.gov/usao-dc/</u> <u>case-multi-defendant/file/1481016/download</u>. ⁸⁰ *Id.*, paragraphs 93-94.

Robert Gieswein of Colorado (#WildDog), a member of the Three Percenters militia who joined the Proud Boys march and Capitol breaches, was the second person to enter the Capitol, followed by Pezzola, still carrying the stolen police shield. Others quickly followed, through an adjacent door they opened and a second window that was breached by other insurrectionists.⁸¹



Gieswein inside the Senate wing of the U.S. Capitol Note crowd of other insurrectionists gathered outside other window (right)



Pezzola (left), Gieswein (right, armed with chemical spray and baseball bat)

⁸¹ See Gieswein's complaint and affidavit at <u>https://www.justice.gov/opa/page/file/1360831/download;</u> see also <u>https://seditiontracker.com/suspects/robert-gieswein.html;</u> <u>https://jan6attack.com/individuals/wilddog/index.htm;</u> <u>https://detrumpify.org/person.php?ID=1824</u>.

Approximately one minute after Geiswein and Pezzola's breach of the Capitol, "[Biggs] entered the Capitol through the adjacent door with other MOSD members. Within minutes, the Senate suspended the Certification of the Electoral College Vote.⁸²

A woman following Biggs chants, "Our House!" and yells, "1776, fuckers! This is our House!" She asked Biggs, "what have you got to say?" Biggs replied with a big smile, "This is awesome!"⁸³



Biggs unlawfully entering the Capitol

Biggs: "This is awesome!"

"[Nordean] entered the Capitol at 2:37 p.m. where he reunited with other Proud Boys members, who had entered the building with [Biggs]."

Approximately two minutes later, Proud Boys chairman Enrique Tarrio, who had been legally barred from entering Washington, DC, wrote a message to the Proud Boys that said, "Make no mistake... We did this."⁸⁴

⁸² See paragraph 95 of superseding indictment at <u>https://www.justice.gov/usao-dc/</u> <u>case-multi-defendant/file/1481016/download</u>.

⁸³ See video of Bigg's unauthorized entry into the Capitol at <u>https://twitter.com/i/status/1356019426827636736</u>.

⁸⁴ See paragraphs 98, 100 of superseding indictment at <u>https://www.justice.gov/usao-dc/</u> <u>case-multi-defendant/file/1481016/download</u>.



Nordean unlawfully entering the Capitol

Gieswein, Pezzola, and many of the initial insurrectionists who breached the Capitol sought out members of Congress in order to stop their proceedings or assault them. Capitol police officer Eugene Goodman, an Army veteran, diverted insurrectionists from an open door to the U.S. Senate and to a waiting line of officers who stopped them outside the U.S. Senate chamber.



Gieswein (left), Pezzola (right) outside U.S. Senate chambers

Insurrectionists would later breach the Senate chamber, but only after the Vice President, Senators and staff had been safely evacuated. For his actions officer Goodman was awarded the Congressional Gold Medal, among other high honors.⁸⁵



Capitol police officer and U.S. Army veteran Eugene Goodman

E. THE PROUD BOYS BREACHES OF THE EAST CAPITOL AREA

Local Proud Boy Ricky Willden (#GreenCanMan) participated in two further breaches of the Capitol with Proud Boys James Haffner of South Dakota (#ZZTopPB), former Marine Ronald Loehrke of Georgia (#MaroonPB), and Oathkeeper Michael Birdsong (#ViperPB) of Idaho, a member of the Proud Boys march.

Together, they breached the northeast side of the Capitol's restricted perimeter. They then breached a police line on the east steps of the Capitol before Willden, Haffner and Loehrke assaulted Capitol police officers in order to unlawfully enter the Capitol with other insurrectionists.⁸⁶

⁸⁵ See e.g., <u>https://en.wikipedia.org/wiki/Eugene_Goodman</u>.

⁸⁶ See Willden's statement of offense at <u>https://www.justice.gov/usao-dc/</u> <u>case-multi-defendant/file/1492866/download;</u> see also <u>https://jan6attack.com/individuals/greencanman/index.htm;</u> <u>https://seditiontracker.com/suspects/ricky-willden.html</u>.

Haffner and Loehrke were in the front line of the initial breach of the northwest pedestrian walkway barrier, and were among the first insurrectionists to reach the lower west terrace area.87



First Capitol perimeter breach - Loehrke (left), Haffner (right)



Lower west terrace - Haffner (left), Loehrke (right)

⁸⁷ See e.g., "US Capitol west side breach as it happened!!!" at <u>https://www.youtube.com/watch?v=oYxKioXhveo&ab_channel=ABQRAW</u>, and Haffner and Loehrke joint complaint at https://www.justice.gov/usao-dc/case-multi-defendant/ file/1459171/download.

See also Haffner at <u>https://jan6attack.com/individuals/zztoppb/index.htm</u> and <u>https://detrumpify.org/person.php?ID=2526;</u> Loehrke at <u>https://jan6attack.com/individuals/</u> maroonpb/index.htm and https://detrumpify.org/person.php?ID=2541.

1. BREACH OF THE NORTHEAST CAPITOL RESTRICTED PERIMETER

At approximately the same time as Proud Boys were breaching the western stairway to the upper west terrace, Willden, Loehrke, Haffner and Birdsong were leading a breach of the northeast restricted perimeter.⁸⁸



Northeast perimeter breach Haffner (left arrow, behind officer), Birdsong (center), Willden (right), Loehrke (right arrow)

In a video of the image above, the man in the yellow beanie pulled a bicycle rack barrier aside while Willden and Loehrke observed and scanned the remaining barrier.

Haffner pulled a barrier away from police on the far side and threw it aside, off of the walkway. He then did the same with a second barrier by which time Willden, Loehrke and Birdsong led insurrectionists onto the eastern Capitol plaza.⁸⁹

⁸⁸ For a summary of the insurrectionist attacks, see <u>https://twitter.com/capitolhunters/</u> <u>status/1450996524029288454/photo/1</u>; see breach at

https://www.youtube.com/watch?v=jBRJmnvFfo8&t=469s&ab_channel=FNTV-FreedomNews TV.

⁸⁹ See breach at <u>https://twitter.com/ryanjreilly/status/1397313790773956616</u>; see also paragraphs 24-26 of Haffner and Loehrke joint complaint at <u>https://www.justice.gov/usao-dc/</u> <u>case-multi-defendant/file/1459171/download</u>.



Northeast perimeter breach Loehrke (left, top), Haffner (center), Willden (right arrow, top)



Northeast perimeter breach Willden (left), Loehrke (right, flashing Proud Boys "OK" sign)

2. BREACH OF THE EAST CAPITOL MAIN DOORS

Willden pled guilty to assaulting Capitol police officers guarding the main doors of the east Capitol entrance, known as the "Columbus Doors," after which he unlawfully entered the Capitol and the Capitol Rotunda area.⁹⁰

Willden was in the immediate vicinity of Loehrke and Haffner as they did the same. Haffner sprayed the same officers with chemical irritants and he and Loehrke then unlawfully entered the Capitol,⁹¹ in violation of four offenses of the United States Code.⁹²



Breach of east Capitol "Columbus Doors" Loehrke (left), Haffner (center, spraying officers), Willden (right)⁹³

<u>case-multi-defendant/file/1459166/download</u>.

⁹⁰ See paragraphs 8-13 of Willden's statement of offense at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1492866/download</u>.

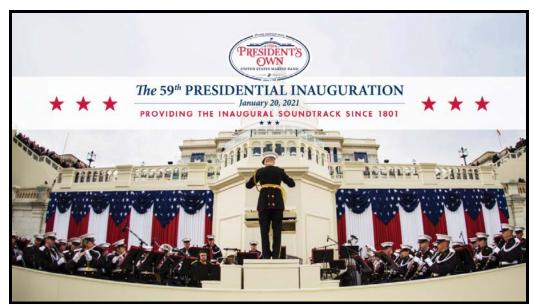
 ⁹¹ See paragraphs 27-30 of Loehrke and Haffner's joint complaint at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1459171/download</u>.
 ⁹² See Loehrke and Haffner criminal complaint at <u>https://www.justice.gov/usao-dc/</u>

⁹³ Image 18 from Loehrke and Haffner joint complaint at <u>https://www.justice.gov/usao-dc/</u> <u>case-multi-defendant/file/1459171/download</u>.

F. PROUD BOY EDDIE BLOCK - LAST MAN ON THE CAPITOL

Eddie Block vowed to be the last man standing on the Capitol. He achieved that with a final livestream of the sun setting over the failed Proud Boy insurrection.⁹⁴

Block's insurrectionist journey ended on an elevated stage built for the inauguration, where the "President's Own" United States Marine Corps Band performed, as they have since 1801.



United States Marine Corps Band - Inauguration Stage



Eddie Block - Desecration of Capitol and Inaugural stage

⁹⁴ See "Cops r here" at <u>https://www.youtube.com/watch?v=aCOH1ZLucOM</u>.

Block's comments included, "Eddie Block is the last man standing. ... just surrounded by officers up here. ... I am surrounded by cops, but at least I can say I will be the last person on the Capitol tonight. ... A whole bunch of Proud Boys carried me up to the [stage]."

When asked by an officer, "How did you get up here?," Block replied, "About five guys carried me up." The officer replied, "You didn't have to come up here," but Block disagreed, saying, "Yeah I did. I did have to come up here because I'm an American."



The end of the failed national insurrection - January 6, 2021

On April 8, 2022 Block announced he was no longer going to livestream events, appearing stressed that he had to testify in upcoming trials of insurrectionists.

"You know, I gotta drive all the way to fucking Washington, DC. I gotta go testify for the January 6th people that are in jail right now. ... I should have ratted on people, the way I'm getting treated. ... I'm just done. ... I'm just sick and tired of people threatening my fucking life. It's getting old. ... And nobody stands up for me. I gotta go testify for people who won't stand up for me, and I'm getting them out of fucking jail. ... I'm not going to put my life at risk anymore for people who just don't give a fuck."95

⁹⁵ See "I'm no longer filming live at political events film rant" at <u>https://www.youtube.com/watch?v=zoUzdoeMSZA&ab_channel=EddieBlockFilms</u>.

POST-INSURRECTION HARASSMENT BY PROUD BOYS

A. PROUD BOY JAMES HOEL'S HARASSMENT OF SCHOOL OFFICIALS

Among the Proud Boys preparing to breach the west Capitol stairway was James Hoel of Florida (#SecretSquirrel). (See pages 67-71.)⁹⁶



Proud Boy James Hoel - January 6, 2021

Hoel has not been arrested or charged for his part in the Capitol attack. He returned to Florida after the insurrection and continued to harass local school boards and officials, an example that is "part of an alarming trend of Proud Boys disrupting local school boards."⁹⁷

On December 14, 2021 the New York Times noted that trend, writing, "Members of <u>the Proud Boys</u>, the far-right nationalist group, have increasingly appeared in recent months at town council gatherings, school board presentations and health department question-and-answer sessions across the country. Their presence at the events is part of a strategy shift by the militia organization toward a larger goal: to bring their brand of menacing politics to the local level."⁹⁸

⁹⁷ See e.g., <u>https://twitter.com/Detrumpify_org/status/1456483142055780354</u>.
⁹⁸ See "Proud Boys Regroup, Focusing on School Boards and Town Councils" at <u>https://www.nytimes.com/2021/12/14/us/proud-boys-local-issues.html</u>.

⁹⁶ See e.g., <u>https://jan6attack.com/individuals/secretsquirrel/index.htm;</u> <u>https://detrumpify.org/person.php?ID=2447</u>.



Proud Boy James Hoel leading harassment of a school board official at their home October 4, 2021

B. SIMILARITIES TO EL DORADO COUNTY HARASSMENT

Hoel's harassment of school officials is very similar to the harassment of El Dorado County schools and officials, including at a principal's home, by commissioner Chris Cockrell and others who protested with him in 2021-2022.⁹⁹

A formal complaint of Cockrell's harassment of school officials was submitted to the El Dorado County Board of Supervisors on January 10, 2022. The Board has not acknowledged or acted on the complaint as of April 25, 2022.¹⁰⁰

⁹⁹ See e.g., "Parent protests persist at Buckeye Elementary" at
 <u>https://www.mtdemocrat.com/news/parent-protests-persist-at-buckeye-elementary/</u>.
 ¹⁰⁰ See January 10, 2022 public record letter of complaint and enclosures titled "Abuse of



Public harassment of Buckeye Elementary School principal Enclosure 10 to commissioner Chris Cockrell complaint, dated January 10, 2022

C. ONGOING PROUD BOYS HARASSMENT OF LOCAL SCHOOL BOARDS

A pattern of harassment or attempted intimidation of school boards by Proud Boys and other extremists is ongoing, locally and nationally.¹⁰¹

Their efforts are part of a post-insurrection shift by the Proud Boys away from the failed insurrection to local chapters taking on perceived community causes, as described by Proud Boy Jeremy Bertino of North Carolina (#NobleBeard) who said, "The plan of attack if you want to make change is to get involved at the local level."

According to Bertino, the Proud Boys "had dissolved its national leadership after Jan. 6 and was being run exclusively by its local chapters. … It was deliberately involving its members in local issues."¹⁰²

Nevertheless, local Proud Boys chapters are still part of their national organization, which faces potentially significant legal liabilities stemming from lawsuits against the Proud Boys International L.L.C. and its leaders.¹⁰³

activity at https://detrumpify.org/person.php?ID=2857.

¹⁰¹ See e.g., "'Mob rule': Rocklin school board meetings overwhelmed by chaos, threats, and misinformation" at <u>https://www.sacbee.com/opinion/article254625807.html</u>. ¹⁰² See "Proud Boys Regroup, Focusing on School Boards and Town Councils" at <u>https://www.nytimes.com/2021/12/14/us/proud-boys-local-issues.html</u>; see also Bertino's Proud Boy

¹⁰³ See e.g., footnote 1 on page 6 of the District of Columbia lawsuit at <u>https://oag.dc.gov/sites/</u> <u>default/files/2021-12/Final-Complaint-.pdf</u>.

1. PROUD BOY JEREMY BERTINO'S ESPOUSAL OF VIOLENCE

Bertino was included in Block's video of the September 26, 2020 Proud Boys rally in Portland, Oregon. (See pages 4–6.)¹⁰⁴ He also appears in Block's Washington, DC videos of December, 2020. (See e.g., page 40, footnote 46.)



Proud Boy Jeremy Bertino - Portland, OR - September 26, 2020 Note "RWDS" patch, an acronym for "Right Wing Death Squad"

Bertino espouses violence. For example, in November, 2020 Bertino and other Proud Boys acted as "security" for a right-wing coalition rally. Bertino used a bullhorn to taunt counter-protestors by saying, "America will never be a communist nation-never! ... Your side will lose. We will exterminate you like the rats you are ... Exterminate you!," followed by the Proud Boys ubiquitous chant of "Fuck Antifa!"¹⁰⁵

¹⁰⁴ See <u>https://www.youtube.com/watch?v=CaOqB9NqAwc&ab_channel=EddieBlockFilms</u>.
 ¹⁰⁵ See e.g, " 'We will exterminate you': Proud Boys and other right-wing Trump diehards confront counter-protestors at Raleigh rally" at https://www.rawstory.com/2020/11/we-will-exterminate-you-proud-boys-and-other-right-wing-trump-diehards-clash-with-counter-protesters-at-raleigh-rally/; see also

https://www.youtube.com/watch?v=WWhuHafI-ww&t=6s.

On December 12, 2020 Block livestreamed Bertino taunting "Antifa" to fight in downtown Washington, DC. Approximately ten minutes later Bertino and three other Proud Boys were stabbed by a lone person who the Proud Boys assaulted.

Bertino's taunts were, "Hey, we're out here. We're waiting at Harrington. So, Antifa, if you're watching ... where the fuck you at? We've been chasing you all night. You ran like bitches. You're hiding behind the cops. We're right here motherfucker. Come get some. You don't want the Proud Boys in DC? Take a look around, motherfucker. We're here. We're here, and you're doing nothing about it. ... I'm calling you out. Right now, at the Harrington [Hotel]. Let's end this shit for good. Because if you come here, we will put you down for good. It's over with. ... We will end you tonight. Come here.¹⁰⁶



Bertino - "Where the fuck you at?"



Bertino - Recovering from surgery

Because of his stab wound and recovery, Bertino was prevented from joining the Proud Boys attack on the Capitol. He is believed to be "PERSON-1" in a superseding indictment of Proud Boys leaders who planned the attack.

Bertino's home and workplace were raided by the FBI in March, 2022 as part of its ongoing investigations into the Capitol attack.¹⁰⁷

¹⁰⁶ See <u>https://www.youtube.com/watch?v=ZQawR_tbIC8&ab_channel=EddieBlockFilms</u>, starting at time 1:24:45.

¹⁰⁷ See paragraphs 16, 28, 30, 32, 40, 46, 52, 55, 60, 64 of superseding indictment at <u>https://www.justice.gov/usao-dc/case-multi-defendant/file/1481016/download;</u> see also <u>https://www.charlotteobserver.com/news/local/crime/article260588092.html</u>.

2. EXAMPLES OF LOCAL SCHOOL BOARD HARASSMENT

On December 21, 2021 Proud Boy Jeffrey Perrine spoke to the Lincoln High School Board, wearing a Proud Boy hoodie and beanie. He made a number of disparaging and insulting comments, seemingly related to Covid-19 mandates, but started by saying his children are home-schooled.

He ended by threatening the board members with a slate of opposing candidates in future elections.¹⁰⁸ His own video of the remarks ends with a supporter laughing, "Proud of Your Boy!"



Proud Boy Jeffrey Perrine - Lincoln High School Board Meeting - Dec. 21, 2021

In February, 2022, Perrine also berated the Roseville School Board about mask mandates. His comments were equally dismissive and threatening, as in, "It's the libtards, it's Progressives, and it's psychopathic Marxists in our schools and our school boards. Do something about it or we will."

As at the Lincoln school board meeting, Perrine's own video also ends with a supportive cheer of "Proud of Your Boy!"¹⁰⁹

¹⁰⁸ See <u>https://www.youtube.com/watch?v=uQ7poIt1BYo&t=1s</u>.

¹⁰⁹ See <u>https://www.youtube.com/watch?v=-V5QL5GnLg0&ab_channel=ThePrudentPatriot</u>.

On April 21, 2022 a group of Proud Boys entered the Davis School Board meeting room and one of them, wearing a "PB" mask, addressed the board. Two Proud Boys flashed the group's divisive "OK" sign at the audience before and after their speaker's remarks. ¹¹⁰



Proud Boys and speaker "L.G. Brandon" (circled) - Davis School Board - April 21, 2022

The speaker identified themself on a speaker's card as "L.G. Brandon," a derogatory phrase used by extremists to mean "Fuck Joe Biden."

The speaker's comments implied they or their group had attended a previous school board meeting. They finished their comments with "Join your local Proud Boy Chapter. We'll have our home again. Uhuru."¹¹¹

¹¹⁰ See the Davis School Board online recording of public comment at <u>https://davis.granicus.com/player/clip/1420?view_id=4&redirect=true; see public video of Proud Boys at <u>https://www.youtube.com/watch?v=9dteHKFP37g&ab_channel=</u><u>Throwaway.throwaway</u>.</u>

¹¹¹ See e.g., <u>https://en.wikipedia.org/wiki/Let%27s_Go_Brandon</u>. The "home" reference is to a white nationalist song that Eddie Block refers to as the Central Valley Proud Boys "anthem." See e.g., <u>https://twitter.com/Borwin10/status/1333504404331216901</u>.





Proud Boys Speaker "L.G. Brandon" Davis Joint Unified School District Board Meeting - April 21, 2022

Two members of the group wore new attire of the Hangtown Proud Boys. The back has a full sized image of a large skull at the bottom of a Proud Boys wreath, with a skeleton figure brandishing a sword-like weapon within the wreath.



Proud Boys with "Hangtown Proud Boys" attire Davis Unified School District Board Meeting - April 21, 2022



New "Hangtown Proud Boys" image - April 21, 2022

The same Proud Boys were pictured in downtown Sacramento on the same day, April 21st, posing with a protestor of assembly bill 2233.¹¹² They wore the same attire as at the Davis School Board meeting, and joined Hangtown Proud Boys chapter president Patrick Kiehl, local Proud Boy Jonathan Wick, and other local Proud Boys.



Proud Boys - California State Capitol - April 21, 2022

¹¹² See e.g., "See hundreds rally against alleged 'infanticide' bill at state Capitol" at <u>https://www.sacbee.com/news/politics-government/article260566042.html</u>.



Comparison of Proud Boys attending Davis School Board meeting, with Proud Boys representing or connected to El Dorado County April 21, 2022

The Proud Boys pictured above all have connections to El Dorado County, or represent that they do through the wearing of attire with the Hangtown Proud Boys name or logo.

From left to right, above, are Proud Boy Jonathan Wick, two Proud Boys who attended the Davis Joint Unified School District Board meeting on April 21, 2020, and Patrick Kiehl, the Hangtown Proud Boys chapter president. Behind Kiehl are two Proud Boys or associates who frequently appear in El Dorado County.

Wick is believed to be speaker "L.G. Brandon," in part because that speaker had the same reddish beard and mustache as Wick, and a similar physical build.

CONCLUSION

In the 15 months since January 6, 2021, nearly 800 individuals have been arrested in nearly all 50 states for crimes related to the breach of the U.S. Capitol, including over 250 individuals charged with assaulting or impeding law enforcement. The investigation remains ongoing.

The guilty plea of local Proud Boy Ricky Willden, and his agreement to cooperate in further investigations, demonstrates the need for local officials, including the El Dorado County Board of Supervisors, to be aware of extremist connections and their influences on the disruption of functional government.

This review is not a summation of each and every extremist connection or investigative lead, but a demonstration of how local extremist connections led to a national insurrection that demands accountability.

Insurrectionists such as Proud Boys Ricky Willden are required to cooperate pursuant to their plea deals, or being called as witnesses to those facts as in the case of Proud Boy Eddie Block. Those individuals have direct and indirect links to the El Dorado County Board of Supervisors through its appointee's extremist ties.

As in the case of a national conspiracy that is being prosecuted, and subject to ongoing investigations, there is a reasonable probability that similar conspiracies exist or did exist at more local levels, including within El Dorado County.