

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

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

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

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

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

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

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

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

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

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

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

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

Respectfully submitted,

CHANNING D. PHILLIPS  
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Date: April 12, 2021

**CERTIFICATE OF SERVICE**

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

/s/  
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Jessica Arco  
Special Assistant United States Attorney