

**U.S. District Court  
District of Columbia (Washington, DC)  
CRIMINAL DOCKET FOR CASE #: 1:21-cr-00088-DLF-1**

Case title: USA v. SANDLIN

Magistrate judge case number: 1:21-mj-00129-ZMF

Date Filed: 02/05/2021

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Assigned to: Judge Dabney L. Friedrich

**Defendant (1)**

**RONALD L. SANDLIN**

represented by **Jerry Ray Smith , Jr.**  
JERRY RAY SMITH, JR., ATTORNEY AT  
LAW  
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Email: [jerryraysmith@verizon.net](mailto:jerryraysmith@verizon.net)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*  
*Designation: CJA Appointment*

**Pending Counts**

18 U.S.C. 111(a)(1);  
ASSAULTING/RESISTING/IMPEDING  
OFFICERS/EMPLOYEES; Assaulting,  
Resisting, or Impeding Certain Officers  
(1-2)

18 U.S.C. 231(a)(3); CIVIL DISORDER;  
Civil Disorder  
(3-4)

18 U.S.C. 1512(c)(2) and 2; TAMPERING  
WITH A WITNESS, VICTIM OR  
INFORMANT; Obstruction of an Official  
Proceeding and Aiding and Abetting  
(5)

18 U.S.C. 1752(a)(1); TEMPORARY  
RESIDENCE OF THE PRESIDENT;  
Entering and Remaining in a Restricted  
Building or Grounds  
(6)

**Disposition**

18 U.S.C. 1752(a)(2); TEMPORARY  
RESIDENCE OF THE PRESIDENT;  
Disorderly and Disruptive Conduct in a  
Restricted Building or Grounds  
(7)

40 U.S.C. 5104(e)(2)(D); FEDERAL  
STATUTES, OTHER; Disorderly Conduct  
in a Capitol Building  
(8)

40 U.S.C. 5104(e)(2)(E); FEDERAL  
STATUTES, OTHER; Impeding Passage  
Through the Capitol Grounds or Buildings  
(9)

40 U.S.C. 5104(e)(2)(F); FEDERAL  
STATUTES, OTHER; Act of Physical  
Violence in the Capitol Grounds or  
Buildings  
(10)

40 U.S.C. 5104(e)(2)(G); FEDERAL  
STATUTES, OTHER; Parading,  
Demonstrating, or Picketing in a Capitol  
Building  
(11)

**Highest Offense Level (Opening)**

Felony

**Terminated Counts**

None

**Disposition**

**Highest Offense Level (Terminated)**

None

**Complaints**

COMPLAINT in Violation of  
18:231(a)(3), 18:231(a)(3),  
18:1752(a)(1)&(2) and  
40:5104(e)(2)(D)(E)(F)&(G)

**Disposition**

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**Plaintiff**

USA

represented by **Elizabeth Ann Aloï**  
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**TERMINATED: 02/16/2021**  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**  
*Designation: Assistant U.S. Attorney*

Date Filed	#	Page	Docket Text
01/20/2021	<u>1</u>		SEALED COMPLAINT as to RONALD L. SANDLIN (1). (Attachments: # <u>1</u> Statement of Facts) (zstd) [1:21-mj-00129-ZMF] (Entered: 01/20/2021)
01/20/2021	<u>3</u>		MOTION to Seal Case by USA as to RONALD L. SANDLIN. (Attachments: # <u>1</u> Text of Proposed Order)(zstd) [1:21-mj-00129-ZMF] (Entered: 01/20/2021)
01/20/2021	<u>4</u>		ORDER granting <u>3</u> Motion to Seal Case as to RONALD L. SANDLIN (1). Signed by Magistrate Judge Zia M. Faruqui on 1/20/2021. (zstd) [1:21-mj-00129-ZMF] (Entered: 01/20/2021)
01/28/2021			Case unsealed as to RONALD L. SANDLIN (bb) [1:21-mj-00129-ZMF] (Entered: 02/02/2021)
01/28/2021			Arrest of RONALD L. SANDLIN in US District Court for the District of Nevada. (bb) (Entered: 03/30/2021)
02/02/2021	<u>5</u>		NOTICE OF ATTORNEY APPEARANCE Jessica Arco appearing for USA. (Arco, Jessica) [1:21-mj-00129-ZMF] (Entered: 02/02/2021)
02/03/2021	<u>21</u>		Rule 5(c)(3) Documents Received as to RONALD L. SANDLIN from US District Court for the District of Nevada Case Number 2:21-mj-110- DJA (bb) Modified on 3/30/2021 (bb). Modified on 3/30/2021 (bb). (Entered: 03/30/2021)

02/05/2021	<u>6</u>		INDICTMENT as to RONALD L. SANDLIN (1) count(s) 1–2, 3–4, 5, 6, 7, 8, 9, 10, 11. (zltf) (Entered: 02/09/2021)
02/16/2021	<u>9</u>		NOTICE OF SUBSTITUTION OF COUNSEL as to USA. Attorney Arco, Jessica added. Substituting for attorney Kaitlin Vaillancourt (Arco, Jessica) (Entered: 02/16/2021)
02/19/2021	<u>10</u>		NOTICE OF ATTORNEY APPEARANCE: Jerry Ray Smith, Jr appearing for RONALD L. SANDLIN (Smith, Jerry) (Entered: 02/19/2021)
03/11/2021			MINUTE ORDER: The hearing currently scheduled for March 11, 2021 is hereby VACATED, as the government has formally charged RONALD L. SANDLIN and there are no additional matters necessitating action by a magistrate judge. If a hearing has not been scheduled before the assigned district judge, the parties are respectfully directed to contact the chambers of the assigned district judge to schedule a hearing. Signed by Magistrate Judge Zia M. Faruqi on 3/11/2021. (ztl) (Entered: 03/14/2021)
03/15/2021			MINUTE ORDER. Pursuant to the Due Process Protections Act, the Court ORDERS that all government counsel shall review their disclosure obligations under Brady v. Maryland, 373 U.S. 83 (1963), and its progeny, as set forth in Local Criminal Rule 5.1, and comply with those provisions. The failure to comply could result in dismissal of the indictment or information, dismissal of individual charges, exclusion of government evidence or witnesses, continuances, Bar discipline, or any other remedy that is just under the circumstances. So Ordered by Judge Dabney L. Friedrich on March 15, 2021. (lclfl1) (Entered: 03/15/2021)
03/15/2021			NOTICE OF HEARING as to RONALD L. SANDLIN. Status Conference set for 3/18/2021 at 9:30 AM via Video before Judge Dabney L. Friedrich. (zjch) (Entered: 03/15/2021)
03/17/2021			NOTICE OF HEARING as to RONALD L. SANDLIN. Arraignment set for 3/18/2021 at 9:30 AM in Telephonic/VTC before Judge Dabney L. Friedrich. (zjch) (Entered: 03/17/2021)
03/18/2021	<u>11</u>		Consent MOTION for Protective Order by USA as to RONALD L. SANDLIN. (Attachments: # <u>1</u> Text of Proposed Order)(Arco, Jessica) (Entered: 03/18/2021)
03/18/2021			Minute Entry for Status Conference and Arraignment as to RONALD L. SANDLIN on Counts 1–2,3–4,5,6,7,8,9,10,11 held on 3/18/2021 before Judge Dabney L. Friedrich. Not Guilty Plea entered by RONALD L. SANDLIN on Counts 1–2,3–4,5,6,7,8,9,10,11.Speedy Trial Excludable (XT) started 3/18/2021 through 3/25/2021 in the interest of justice. Motions due by 3/22/2021. Responses due by 3/24/2021 Motion Hearing set for 3/25/2021 at 12:30 PM in Telephonic/VTC before Judge Dabney L. Friedrich. Bond Status of Defendant: Committed; Court Reporter: Sara Wick; Defense Attorney: Jerry Ray Smith, Jr.; US Attorney: Jessica Arco. (zjch) (Entered: 03/18/2021)
03/18/2021			MINUTE ORDER as to RONALD L. SANDLIN. With the consent of the parties, and for the reasons stated in today's hearing, namely, the need for the defense to review forthcoming discovery and for the public health and safety reasons set forth in the Chief Judge's Standing Order 21–10, the Court finds that the ends of justice outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Accordingly, pursuant to the Speedy

			Trial Act, the Court excludes time from March 18, 2021 through March 25, 2021 in computing the date for a speedy trial in this case. The Court will hold a hearing on March 25, 2021 at 12:30 pm to consider the defendant's forthcoming motion to revoke the magistrate judge's order of detention. So Ordered by Judge Dabney L. Friedrich on March 18, 2021. (lcldf1) (Entered: 03/18/2021)
03/18/2021	<u>12</u>		ORDER granting the government's <u>11</u> Unopposed Motion for Protective Order. See text for details. Signed by Judge Dabney L. Friedrich on March 18, 2021. (lcldf1) (Entered: 03/18/2021)
03/18/2021	<u>13</u>		NOTICE of Filing by USA as to RONALD L. SANDLIN (Attachments: # <u>1</u> Commitment to Another District, # <u>2</u> Waiver of Rule 5 & 5.1 Hearings, # <u>3</u> Order of Detention)(Arco, Jessica) (Entered: 03/18/2021)
03/22/2021	<u>14</u>		MOTION for Bond by RONALD L. SANDLIN. (Attachments: # <u>1</u> Letters of Support)(Smith, Jerry) (Entered: 03/22/2021)
03/22/2021	<u>15</u>		Amended MOTION for Bond by RONALD L. SANDLIN. (Attachments: # <u>1</u> Letters of Support)(Smith, Jerry) (Entered: 03/22/2021)
03/23/2021	<u>16</u>		Memorandum in Opposition by USA as to RONALD L. SANDLIN re <u>15</u> Amended MOTION for Bond (Attachments: # <u>1</u> Exhibit A)(Arco, Jessica) (Entered: 03/23/2021)
03/24/2021	<u>17</u>		Unopposed MOTION to Continue <i>Bond Hearing</i> by RONALD L. SANDLIN. (Attachments: # <u>1</u> Text of Proposed Order)(Smith, Jerry) (Entered: 03/24/2021)
03/24/2021	<u>18</u>		NOTICE of Filing by USA as to RONALD L. SANDLIN (Attachments: # <u>1</u> Government's Detention Memo)(Arco, Jessica) (Entered: 03/24/2021)
03/24/2021	<u>19</u>		Unopposed MOTION to Continue <i>Bond Hearing</i> by RONALD L. SANDLIN. (Attachments: # <u>1</u> Text of Proposed Order)(Smith, Jerry) (Entered: 03/24/2021)
03/25/2021			MINUTE ORDER as to RONALD L. SANDLIN. Upon consideration of the defendant's <u>19</u> Unopposed Motion to Continue Bond Hearing, it is ORDERED that the motion is GRANTED. Accordingly, today's hearing to consider the defendant's motion to revoke the magistrate judge's order of detention shall be continued to April 6, 2021. With the consent of the parties and for the reasons stated in the defendant's motion, namely the need for the defense to review voluminous discovery, the Court finds that the ends of justice outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Accordingly, pursuant to the Speedy Trial Act, the Court excludes time from March 25, 2021 through April 6, 2021 in computing the date for a speedy trial in this case. So Ordered by Judge Dabney L. Friedrich on March 25, 2021. (lcldf1) (Entered: 03/25/2021)
03/26/2021			MINUTE ORDER as to RONALD L. SANDLIN. The defendant shall file any supplemental response to the government's <u>16</u> Opposition, addressing the government's recently produced discovery, on or before March 31, 2021. So Ordered by Judge Dabney L. Friedrich on March 26, 2021. (lcldf1) (Entered: 03/26/2021)
03/26/2021			Set/Reset Deadlines as to RONALD L. SANDLIN: The defendant shall file any supplemental response to the government's <u>16</u> Opposition, addressing the government's recently produced discovery by 3/31/2021 (zjch) (Entered: 03/26/2021)

03/29/2021	<u>20</u>	Unopposed MOTION to Seal Case by USA as to RONALD L. SANDLIN. (Attachments: # <u>1</u> Exhibit A)(Arco, Jessica) (Entered: 03/29/2021)
03/31/2021	<u>24</u>	REPLY TO OPPOSITION to Motion by RONALD L. SANDLIN re <u>15</u> Amended MOTION for Bond (Smith, Jerry) (Entered: 03/31/2021)
04/01/2021		MINUTE ORDER as to RONALD L. SANDLIN. Upon consideration of the defendant's <u>23</u> Motion for Leave to File Attachment to Reply Under Seal, it is ORDERED that the motion is DENIED WITHOUT PREJUDICE as the defendant has not adequately justified sealing the attached exhibits in their entirety. To the extent that the defendant seeks to redact information that implicates significant privacy interests, see United States v. Hubbard, 650 F.2d 293, 320 (D.C. Cir. 1980), including personal identifying information, the defendant shall file both redacted and unredacted versions of the exhibits under seal, with an accompanying motion to seal that provides the grounds for the proposed redactions. If the Court grants the motion, it will unseal the motion and the redacted version of the exhibits; the unredacted version will remain under seal. Insofar as the defendant seeks authorization to file exhibits that are covered by the parties' protective order, the parties shall confer and file, as appropriate, a joint motion to unseal those exhibits. So Ordered by Judge Dabney L. Friedrich on April 1, 2021. (lcldf1) (Entered: 04/01/2021)
04/01/2021	<u>25</u>	ORDER as to RONALD L. SANDLIN granting the government's <u>20</u> Unopposed Motion to Seal. See text for details. Signed by Judge Dabney L. Friedrich on April 1, 2021. (lcldf1) (Entered: 04/01/2021)
04/02/2021		NOTICE OF HEARING as to RONALD L. SANDLIN Motion Hearing set for 4/6/2021 at 11:30 AM in Telephonic/VTC before Judge Dabney L. Friedrich. (zjch) (Entered: 04/02/2021)
04/02/2021	<u>27</u>	REDACTED ATTACHMENT DOCUMENT by RONALD L. SANDLIN to <u>24</u> Reply to opposition to Motion for Bond filed by RONALD L. SANDLIN. (zhsj) (Entered: 04/05/2021)
04/05/2021		MINUTE ORDER as to RONALD L. SANDLIN granting defendant Sandlin's <u>26</u> Motion for Leave to File Redacted Document on Public Docket and Unredacted Version of Same Document Under Seal. Accordingly, Sandlin's <u>26</u> motion and his [26-1] redacted attachment shall be filed on the public docket, and his [26-2] sealed attachment shall be filed under seal. So Ordered by Judge Dabney L. Friedrich on April 5, 2021. (lcldf1) (Entered: 04/05/2021)
04/05/2021	<u>29</u>	SUPPLEMENT by USA as to RONALD L. SANDLIN re <u>14</u> MOTION for Bond (Arco, Jessica) (Entered: 04/05/2021)
04/06/2021		Minute Entry for proceedings held before Judge Dabney L. Friedrich: Motion Hearing as to RONALD L. SANDLIN held on 4/6/2021 re <u>14</u> MOTION for Bond filed by RONALD L. SANDLIN. Motion Hearing set for 4/8/2021 at 10:00 AM via video before Judge Dabney L. Friedrich. Bond Status of Defendant: Committed; Court Reporter: Sara Wick; Defense Attorney: Jerry Ray Smith, Jr.; US Attorney: Jessica Arco; Pretrial Officer: Christine Schuck. (zjch) (Entered: 04/06/2021)
04/08/2021		MINUTE ORDER as to RONALD L. SANDLIN scheduling the continuation of the detention hearing for April 13, 2021 at 12:30 PM. So Ordered by Judge Dabney L. Friedrich on April 8, 2021. (lcldf1) (Entered: 04/08/2021)

04/08/2021		Set/Reset Hearings as to RONALD L. SANDLIN: Motion Hearing set for 4/13/2021 at 12:30 PM via video before Judge Dabney L. Friedrich. (zjch) (Entered: 04/09/2021)
04/12/2021	<u>30</u>	SUPPLEMENT by USA as to RONALD L. SANDLIN re <u>14</u> MOTION for Bond (Attachments: # <u>1</u> Exhibit A)(Arco, Jessica) (Entered: 04/12/2021)
04/13/2021		Minute Entry for Motion Hearing as to RONALD L. SANDLIN held on 4/13/2021 re <u>14</u> MOTION for Bond filed by RONALD L. SANDLIN, <u>15</u> Amended MOTION for Bond filed by RONALD L. SANDLIN held before Judge Dabney L. Friedrich: Court denies <u>14</u> Motion for Bond as to RONALD L. SANDLIN. Status Conference set for 5/12/2021 at 1:00 PM via video before Judge Dabney L. Friedrich. Speedy Trial Excludable (XT) started 4/13/2021 through 5/12/2021 in the interest of justice. Bond Status of Defendant: Committed; Court Reporter: Sara Wick Defense Attorney: Jerry Ray Smith, Jr; US Attorney: Jessica Arco; Pretrial Officer: Christine Schuck. (zjch) (Entered: 04/13/2021)
04/13/2021	<u>31</u>	ORDER as to RONALD L. SANDLIN denying the defendant's <u>15</u> Amended Motion for Bond and, pursuant to the Speedy Trial Act, excluding time from April 13, 2021 through May 12, 2021 in computing the date for a speedy trial in this case. See text for details. Signed by Judge Dabney L. Friedrich on April 13, 2021. (lcdlf1) (Entered: 04/13/2021)
04/15/2021	<u>32</u>	Unopposed MOTION for Disclosure of <i>6(e) materials</i> by USA as to RONALD L. SANDLIN. (Attachments: # <u>1</u> Proposed Order)(Arco, Jessica) (Entered: 04/15/2021)
04/15/2021	<u>33</u>	ORDER as to RONALD L. SANDLIN granting the government's <u>32</u> Motion for Disclosure. See text for details. Signed by Judge Dabney L. Friedrich on April 15, 2021. (lcdlf1) (Entered: 04/15/2021)
04/26/2021	<u>34</u>	NOTICE OF APPEAL (Interlocutory) by RONALD L. SANDLIN re <u>31</u> Order on Motion for Bond,. Fee Status: No Fee Paid. Parties have been notified. (Smith, Jerry) (Entered: 04/26/2021)
04/28/2021	<u>35</u>	NOTICE OF ATTORNEY APPEARANCE Elizabeth Ann Aloï appearing for USA. (Aloi, Elizabeth) (Entered: 04/28/2021)

United States District Court for the District of Columbia

UNITED STATES OF AMERICA	)	
	)	
vs.	)	Criminal No. <u>21-88 (DLF)</u>
	)	
<u>Ronald Sandlin</u>	)	

NOTICE OF APPEAL

Name and address of appellant: Ronald Sandlin  
D.C. Department of Corrections  
Central Treatment Facility  
1901 E Street, S.E.  
Washington, DC 20003

Name and address of appellant's attorney: Jerry Ray Smith, Jr.  
Attorney at Law  
717 D Street, N.W.  
Suite 310  
Washington, DC 20004

Offense: Obstruction of an Official Proceeding (18 U.S.C., Section 1512(c)(2))

Concise statement of judgment or order, giving date, and any sentence:  
Denial of Motion for Bond, April 13, 2021

Name and institution where now confined, if not on bail: D.C. Department of Corrections  
Central Treatment Facility

I, the above named appellant, hereby appeal to the United States Court of Appeals for the District of Columbia Circuit from the above-stated judgment.

April 26, 2021  
DATE

Ronald Sandlin  
APPELLANT

Jerry Ray Smith, Jr.  
ATTORNEY FOR APPELLANT

GOVT. APPEAL, NO FEE   
CJA, NO FEE   
PAID USDC FEE   
PAID USCA FEE

Does counsel wish to appear on appeal? YES  NO   
Has counsel ordered transcripts? YES  NO   
Is this appeal pursuant to the 1984 Sentencing Reform Act? YES  NO

MIME-Version:1.0

From:DCD\_ECFNotice@dcd.uscourts.gov

To:DCD\_ECFNotice@localhost.localdomain

Bcc:

--Case Participants: Jerry Ray Smith, Jr (jerryraysmith@verizon.net), Jessica Arco (jessica.arco2@usdoj.gov), Judge Dabney L. Friedrich (athanasia\_livas@dcd.uscourts.gov, cody\_poplin@dcd.uscourts.gov, dabney\_l.\_friedrich@dcd.uscourts.gov, david\_beylik@dcd.uscourts.gov, dennis\_howe@dcd.uscourts.gov, dlf\_dcdecf@dcd.uscourts.gov, jason\_ethridge@dcd.uscourts.gov, joe\_falvey@dcd.uscourts.gov, jonathan\_hopkins@dcd.uscourts.gov, kimberly\_jackson@dcd.uscourts.gov, madeline\_mcmahon@dcd.uscourts.gov, michael\_showalter@dcd.uscourts.gov, noah\_mccullough@dcd.uscourts.gov)

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--No Notice Sent:

Message-Id:7074391@dcd.uscourts.gov

Subject:Activity in Case 1:21-cr-00088-DLF USA v. SANDLIN Order on Motion for Bond

Content-Type: text/html

## U.S. District Court

## District of Columbia

### Notice of Electronic Filing

The following transaction was entered on 4/13/2021 at 2:01 PM and filed on 4/13/2021

**Case Name:** USA v. SANDLIN

**Case Number:** 1:21-cr-00088-DLF

**Filer:**

**Document Number:** No document attached

#### Docket Text:

**Minute Entry for Motion Hearing as to RONALD L. SANDLIN held on 4/13/2021 re [14] MOTION for Bond filed by RONALD L. SANDLIN, [15] Amended MOTION for Bond filed by RONALD L. SANDLIN held before Judge Dabney L. Friedrich: Court denies [14] Motion for Bond as to RONALD L. SANDLIN. Status Conference set for 5/12/2021 at 1:00 PM via video before Judge Dabney L. Friedrich. Speedy Trial Excludable (XT) started 4/13/2021 through 5/12/2021 in the interest of justice. Bond Status of Defendant: Committed; Court Reporter: Sara Wick Defense Attorney: Jerry Ray Smith, Jr; US Attorney: Jessica Arco; Pretrial Officer: Christine Schuck. (zjch)**

**1:21-cr-00088-DLF-1 Notice has been electronically mailed to:**

Jerry Ray Smith, Jr jerryraysmith@verizon.net

Jessica Arco jessica.arco2@usdoj.gov

**1:21-cr-00088-DLF-1 Notice will be delivered by other means to::**



18 U.S.C. § 3142(f)(2)(A) and a “serious risk to obstruct justice” under 18 U.S.C. § 3142(f)(2)(B). Detention Memo at 1. In its Detention Memo, the government notes how, after the events of January 6, Mr. Sandlin appears to have travelled from where he was living to towns in the Los Angeles area and was then subsequently located in Las Vegas. Id. at 12. The government argues that Mr. Sandlin was in the Los Angeles area and Las Vegas because he was fleeing his residence to avoid arrest, knowing that he must have been wanted by the FBI in part because of “the public streaming of his criminal conduct on social media.” Id. at 15. This appears to be the government’s basis for claiming that Mr. Sandlin poses a serious risk of flight so as to qualify for consideration for preventive detention. In its Detention Memo, the government also alleges that Mr. Sandlin took down certain videos that incriminated him in connection with the events of January 6 that he had previously posted on his Facebook page. Id. at 7. This appears to be the government’s basis for claiming that Mr. Sandlin poses a serious risk of obstruction of justice so as to qualify for consideration for preventive detention. In its Detention Memo, the government then goes on to argue that Mr. Sandlin should be held without bond because he is a flight risk and poses a danger to society. Id. at 14-15. In regards to Mr. Sandlin being a danger to society, the government describes in detail conduct that Mr. Sandlin is alleged to have engaged in at the Capitol on January 6, and it quotes several recorded statements that he is alleged to have made about January 6, both before and immediately after the events at issue. Id. at 3-10. The government argues that, because of what Mr. Sandlin is alleged to have done in connection to the events of January 6, he poses a danger to society—apparently on the theory that the fact that he engaged in those events means he is likely to do something similar in the future. Id. at 15. At the initial appearance, the Magistrate Judge ordered Mr. Sandlin preventively detained, finding that no condition or combination of conditions would reasonably assure the safety of any other person and the community or Mr. Sandlin’s appearance at future proceedings. Detention Order at 2. In finding that Mr. Sandlin poses a risk of flight, the Magistrate

Judge noted that Mr. Sandlin has a “[l]ack of significant community or family ties to this district.” Id. at 3.

3. Since being appointed to represent Mr. Sandlin, undersigned counsel has been continuously receiving a steady flow of letters of support for Mr. Sandlin from various friends, family members, and business associates. A sampling of the letters is attached to this filing. Attachment, Letters of Support. In the letters, Mr. Sandlin is consistently described as a kind, extremely generous, and non-violent person who goes out of his way to engage and help other people and who is devoted to volunteerism and helping the community. Among other things, the writers frequently remark on how Mr. Sandlin helped start up and develop a non-profit organization serving people in a low-income neighborhood and how he has been actively involved in animal rescue. The writers also frequently remark on Mr. Sandlin’s entrepreneurial spirit and how he has not only created his own business but also helped others to start and develop their own. It is important to note that several of the people who have written letters for Mr. Sandlin have expressed deep disapproval of what happened at the Capitol on January 6, 2021. Nevertheless, all of these people still maintain a firm belief that Mr. Sandlin is a person of goodwill. The fact that so many people have come forward to speak on Mr. Sandlin’s behalf is remarkable. It is submitted that a review of the attached letters is perhaps the best way to get a sense of who Mr. Sandlin is.<sup>1</sup>

4. Mr. Sandlin is 33 years old. He was raised by his adoptive parents in Long Beach in Los Angeles County, California. Mr. Sandlin’s mother is a teacher who taught at a Lutheran school for 25 years. Mr. Sandlin’s father is a chemical engineer who worked for 35 years in the aerospace industry. Growing up, Mr. Sandlin was a bright

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<sup>1</sup> Undersigned counsel has taken the liberty of redacting the letters he has received on Mr. Sandlin’s behalf to conceal contact and location information for the writers and all but the first initials of their last names. It is important to note that none of the persons who wrote the letters asked counsel to do this. However, counsel thought it was prudent to make the redactions to protect the writers from unwanted contacts by the media. Upon request, counsel can provide the full names and contact and location information for the writers to the Court.

student and actively involved in the Boy Scouts from the ages of six to sixteen. Mr. Sandlin lived with his parents and his younger adoptive brother in Long Beach until he was in his early twenties. He moved out to live with his girlfriend. Six years ago, Mr. Sandlin and his girlfriend moved from California to Las Vegas, Nevada. In Nevada, Mr. Sandlin had an online marketing business that was quite successful for a while. Mr. Sandlin and his girlfriend were planning to get married. However, Mr. Sandlin's business suffered some setbacks and began failing, and he grew depressed. About nine months ago, Mr. Sandlin's girlfriend ended their relationship. At this time, Mr. Sandlin's parents had recently relocated from Long Beach, California to a rural community outside of Memphis, Tennessee to be with Mr. Sandlin's maternal grandfather, who was in poor health. When he and his girlfriend broke up, Mr. Sandlin decided he wanted to be closer to his parents and his grandfather, who was now dying. In approximately July 2020, Mr. Sandlin moved from Las Vegas to Memphis. He was only in Memphis for a short time before his grandfather died. Around this same time, he realized he had made mistake leaving his life in Las Vegas, and he decided to move back. In November 2020, Mr. Sandlin gave up his apartment in Memphis, moved in with his parents, and began making plans to move back to Las Vegas. He was already in the process of relocating back to Las Vegas when the events of January 6, 2021 transpired. After those events, Mr. Sandlin did in fact relocate to Las Vegas. During this time, he also visited friends where he used to live in the Los Angeles area. This is why Mr. Sandlin was in the Los Angeles area after January 6 and why he was in Las Vegas when he was arrested—not because he was fleeing his residence the Memphis area to avoid arrest. When the Magistrate Judge in the District of Nevada found that Mr. Sandlin had a “[l]ack of significant community and family ties to this district” in concluding that he posed a risk of flight, the judge was incorrect. Mr. Sandlin had lived in Las Vegas for over five years and had an established life there.

5. Mr. Sandlin is highly committed to community activism. When Mr. Sandlin was still living in California, he started a non-profit organization called Pedal Movement in a low-income neighborhood in Long Beach with a large homeless population. Pedal Movement worked to provide bicycles to people in the community to foster their ability to get and keep jobs. Mr. Sandlin and his friend were able to get a local arts college to donate a parking lot with an abandoned building to Pedal Movement. They transformed the building into the hub of the operation. Pedal Movement accepted donated bikes and parts, gave the bikes they received and refurbished to people in the community, trained persons to become bicycle mechanics, and provided people in the community with affordable bicycle-repair services. Even today, an iteration of Pedal Movement is still operating. Many of the people who have written letters for Mr. Sandlin have commented on his involvement in starting up and developing Pedal Movement. See Attachment, Letters of Support at 1, 2, 3, 11, 12.

6. In part using lessons he had learned from online outreach for Pedal Movement, Mr. Sandlin developed his own on-line marketing company. This company became a thriving concern when Mr. Sandlin moved to Las Vegas. Mr. Sandlin would invest in advertising to identify and recruit people who were in need of certain services and products. He would then connect these people with the appropriate providers. As an adjunct to his online marketing business, Mr. Sandlin also consulted with other online business owners, especially minority business owners, about developing their businesses. Much of this work was done pro bono. At the height of his business, Mr. Sandlin had seven employees and a monthly payroll in excess of \$50,000. Many of the people who have written letters of support for Mr. Sandlin have commented on his entrepreneurial and business activities. See Attachment, Letters of Support at 4, 10, 14-15,

7. After moving to Tennessee from Las Vegas, Mr. Sandlin began developing a business plan for helping makers of athletic and leisure wear identify

manufacturing operations to make their products. If released, this is the business that Mr. Sandlin intends to pursue.

8. According to the Pretrial Service Agency report that was prepared for Mr. Sandlin's initial appearance in the District of Nevada, Mr. Sandlin has an arrest for DUI from 2013. The report does not indicate any disposition. Apart from this incident, Mr. Sandlin has not had any other involvement with the criminal-justice system.

9. In this case, Mr. Sandlin has now been charged by indictment. None of the counts he is charged with create a presumption that he should be held without bond. See 18 U.S.C. §3142(e)(2), (e)(3), and (f)(1). In the indictment, Mr. Sandlin is charged with two separate counts of assaulting, resisting, or impeding a United States officer/employee under 18 U.S.C. § 111(a)(1). The government has provided undersigned counsel with videos from the U.S. Capitol from January 6, 2021 that it alleges show Mr. Sandlin committing each of these charged offenses. One video shows what appears to be Capitol security personnel trying to push closed a set of double doors while a group of people occupying the Capitol are trying to keep the doors open. The security personnel and the occupiers are all on the outside of the doors. The government appears to be alleging that Mr. Sandlin is one of the people trying to keep the doors open. In the video, occupiers appear to push the security personnel out of the way and then chase them off. It does not appear that anyone was injured. Another video shows what appears to be a U.S. Capitol Police Officer in a doorway blocking occupiers who are pushing against him from entering through the doorway into the room behind him. Behind the officer are other occupiers who have already entered the room, presumably through some other entrance. These occupiers appear to be trying to pull the officer out of the doorway from behind. While this incident was undoubtedly traumatic and scary for the officer involved, it does not appear from the video that he was injured.

10. If the Court sees fit to release Mr. Sandlin, he will live with his parents on their 40-acre farm about an hours' drive from Memphis. Mr. Sandlin's parents describe

where they live as being “in the middle of nowhere.” Mr. Sandlin will consent to GPS location monitoring and travel restrictions. He will also consent to having PSA monitor his online activities to alleviate any concerns the Court might have about him connecting with people online to engage in future improper political activities. If Mr. Sandlin is released, Mr. Sandlin’s parents are willing to drive to Washington, D.C. to pick Mr. Sandlin up and take him straight back to their home.

11. Where a magistrate judge has ordered a person to be held without bond pending trial, “the person may file, with the court having original jurisdiction over the offense, a motion for revocation or amendment of the order.” 18 U.S.C. § 3145(b). In order to hold a person without bond pending trial, a judicial officer must find that “no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of any other person and the community.” 18 U.S.C. § 3142(e)(1). Here, conditions of release can be fashioned for Mr. Sandlin that will reasonably assure his appearance at future court proceedings and the safety of other persons and the community. Accordingly, Mr. Sandlin should be released on conditions.

## **DISCUSSION**

As an initial matter, it must be noted that it is questionable whether or not Mr. Sandlin even qualifies for consideration for preventive detention on the grounds that he poses a “serious risk of flight” and a “serious risk to obstruct justice.” In its initial Detention Memo, the government references the fact that, after January 6, Mr. Sandlin went to the Los Angeles area and then to Las Vegas. The government argues that this shows that Mr. Sandlin was fleeing the Memphis area to avoid arrest. However, when properly understood, the facts do not show this at all. Mr. Sandlin had already made plans to relocate from Memphis, where he had only been for a short time, back to Las Vegas prior to January 6, and was simply following through on those plans when he went to California and Las Vegas after January 6. On this point, it should be noted that, given

“the public streaming of his criminal conduct on social media” that the government has referenced, if Mr. Sandlin was trying to avoid arrest, he would not have gone to the Los Angeles area and Las Vegas, the only two places where he has ever lived and is thus known enough to likely be turned in by people who would recognize him. Thus, Mr. Sandlin’s travel to the Los Angeles area and Las Vegas does not evince an attempt to flee. Moreover, in regards to obstruction of justice, the fact that Mr. Sandlin may have taken down from public view on Facebook potentially incriminating videos that he himself posted in the first place does not provide sufficient grounds for actually concluding that he poses a serious risk of obstruction of justice. One’s decision to simply no longer publicize his illegal conduct is somewhat less sinister than actually concealing evidence that he never made public to begin with. Beyond all this, even if it can be found that Mr. Sandlin does qualify for consideration for preventive detention on the grounds that he poses a “serious risk of flight” or a “serious risk to obstruct justice,” the Court still cannot find that such detention is appropriate upon closer examination of the facts. When deciding whether or not to detain a person pending trial, a judicial officer is to look at 1) the “nature and circumstances of the offense[s] charged,” 2) “the weight of the evidence against the person,” 3) “the history and characteristics of the person,” and 4) “the nature and seriousness of the danger to any person or the community that would be posed by the person’s release.” 18 U.S.C. § 3142(g). Consideration of these factors compels a finding that Mr. Sandlin should be released on conditions.

#### **Nature and Circumstance of the Offenses and Weight of the Evidence**

In this case, Mr. Sandlin is charged by indictment with, among other things, two separate counts of assaulting, resisting, or impeding a United States officer/employee under 18 U.S.C. § 111(a)(1). These are obviously the counts that will most trouble the Court. Admittedly, the government has video evidence that appears to capture the conduct giving rise to these counts. However, it must be noted that the video evidence

does not appear to show that the United States personnel listed as the victims in the counts were injured. Additionally, neither of the two counts under 18 U.S.C. §111(a)(1) nor any of the other counts in the indictment against Mr. Sandlin are for offenses that are considered dangerous enough to create a presumption on their own that he should be held without bond, and the government has not pointed to anything outside of conduct related to those charged crimes that would indicate that Mr. Sandlin would pose a danger to society. Additionally, the events of January 6 that Mr. Sandlin is alleged to have engaged in were occasioned by an already uncommon event (the quadrennial counting of the Electoral College votes in the United States Congress) occurring in the extremely unusual context of people being widely told by news sources and obviously very high-ranking public officials that the votes were illegitimate and the counting process corrupt. It is hard to see how a similar confluence of events would occur again. Accordingly, consideration of the nature and circumstances of the charged offenses and the weight of the evidence does not militate in favor of preventive detention.

### **The History and Characteristics of Mr. Sandlin**

Mr. Sandlin is 33 years old and, apart from a DUI arrest from eight years ago, does not appear to have any prior involvement with the criminal-justice system. Mr. Sandlin has a history of community activism and volunteerism and is widely regarded as kind, generous, and non-violent person. He has been a productive member of society—a developer of a non-profit organization serving low-income and homeless people, an entrepreneur, an employer. He has helped other people develop their own businesses. Even if it is assumed that Mr. Sandlin did what the government has charged him with, it must be acknowledged that such conduct would still be anomalous for him and not representative of who he is as a person. He has strong support from his family and friends. Consideration of Mr. Sandlin’s history and characteristics militate strongly in favor of release.



**ATTACHMENT**  
**Letters of Support**

**From:** [REDACTED]  
**To:** jerryraysmith@verizon.net,  
**Subject:** Ronald Sandlin  
**Date:** Wed, Mar 17, 2021 2:52 pm

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To the Honorable Judge,

This letter is to serve as a character witness of Ronald Sandlin by a friend of his.

I would like to start out by saying that I think what happened that day was absolutely atrocious. Not only do I not support the previous President, but I abhor the actions and mentality espoused by his followers.

That said, outside of his support for the former President, my knowledge of Ronnie has always been of a person who motivates and encourages others.

Before he began supporting the former president Ronnie set up a bicycle training program that taught youth how to build bikes from scratch and gave them the ability to earn money building and repairing bikes.

He did this by building close relationships within the community and eventually got the support of the County of Los Angeles. The location for the bicycle hub was in a low-income area where many of the youth lack after school programs or even nearby parks. This type of programming brought positive socialization to the community and developed skills for self-sufficiency.

Before I met Ronnie I was 22 years old and did not yet know how to ride a bicycle. He helped teach me and motivate me and the bicycle is now one of my main forms of transportation.

Despite my criticism of his political leanings, Ronnie is a person of compassion who very much cares about the well-being of animals, about social uplift and creating prosperous communities of sharing.

I believe that the former President created an environment that led to unhealthy mindsets and destructive behavior in many of his supporters. I ask that the court not lean to heavy prison time but instead to community service. I do not believe that incarceration will aid in his personal character development as much as service to the community.

President Trump displays characteristics of narcissism and he brought out the narcissistic tendencies of many of his followers I believe the best benefit to society will not be in locking up his supporters in crowded prisons, but forcing them to serve the community and be of service to others.

I have seen Ronnie volunteer in this capacity and he has done great things to better the community.

Despite my disdain for his politics I will happily write this letter of support as he has been someone who has demonstrated compassion, empathy and appreciation for community.

I ask that the court sentence him to long hours of community service where he can benefit society more than being behind bars.

If there is the potential for him to serve years in prison, I ask that the court sentence him instead of years of community service. This is where he will be the greatest benefit to society and where he can truly learn lessons of humility, compassion and service of to others.

Thank you,  
Elliott G.  
Community Advocate

From: [REDACTED]

To: jerryraysmith@verizon.net,

Subject: Ronald Sandlin

Date: Fri, Mar 12, 2021 3:49 pm

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Leigh Anne S

To Whom it may concern,

I am a retired parochial school teacher and I am mom to Ronald Sandlin. My husband and I adopted Ron at the age of 4. He has always been a very loving, loyal, respectful person. He was very active in the boy scouts from age 6-16. He was always very smart and began taking college level computer classes while still in high school. He is very well read. He loves books and learning new things. As a young adult he founded Pedal Movement, a non profit organization that provided bikes for less fortunate people as well as provide them bike education. This organization has grown and is still in business. He also started a business to teach others how to market their on line businesses. He has also worked closely with the animal shelters in Long Beach and has rescued many dogs.

Ronnie is passionate about many things. He loves life and makes friends easily. He has never been in trouble before this incident and it has been very out of character for him. He is not a violent person and has not associated with people who are.

Ronnie moved to our family farm in Tn when his grandfather became very ill and he wanted to be here to help. Since his grandfather passed away he had planned to return to Las Vegas to live.

We fully support Ronald and hope that he will be released and return home.

Leigh Anne S

Sent from my iPhone

From: [REDACTED]

To: Jerryraysmith@verizon.net,

Subject: Character Reference for Ron Sandlin

Date: Sat, Mar 20, 2021 5:57 pm

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Nova S:  
[REDACTED]

To Whom it may concern,

My name is Nova S: [REDACTED]. I am a preschool teacher and mom of four children. I have known Ronnie since he was 5 years old. We grew up together in California. As we got older we didn't see each other often except on vacations, but we have kept in contact over the past few years through Facebook. We were able to spend some time together this past October. Ronnie has always been a very smart, kind, caring person. He has done a lot of work in his community from feeding the homeless in Las Vegas, working to make sure bikes were available for those who needed transportation in Long Beach, and working with animal shelter rescues in both Long Beach and Las Vegas. I have never known Ronnie to be violent or be in any trouble. Ronnie has always shown good moral conduct. It is my sincere hope that you will take this letter into consideration and that he will be able to await his trial at home with his family and his dogs.

Sincerely,

Nova S

Sent from Yahoo Mail on Android

**From:** [REDACTED]

**To:** Jerryraysmith@verizon.net,

**Subject:** Ronnie Sandlin

**Date:** Wed, Mar 10, 2021 8:44 pm

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To whom it may concern,

Though I do not condone any of his recent actions, I am here to give witness that Ronnie Sandlin is a good person with an incredible track record of helping fellow friends, entrepreneurs and business owners in his local community and abroad. I've counted him as one of my best friends for over a decade now.

Our friendship began when I was struggling through my own hardships and he took me in, a complete stranger, when I had no place to go. We shared a mutual interest in marketing and a passion for people. Ronnie has always been the kind of person to share what he has whether its shelter, food or advice on how to grow your business. He's a mentor to many people who have counted on his consulting and knowledge to grow their business and achieve record breaking revenue goals and financial security.

He was raised by two wonderful parents that adopted him and instilled a great sense of self and has proved a great benefit to him and the many people that consider themselves fortunate for knowing him. It breaks my heart to see him in solitary confinement considering he's never been convicted of anything in his life before. I know he is very remorseful and hope the court may consider his contributions as a whole and not define his life by this single moment.

Respectfully,

Rob R  
President of Sales & Business Development



**From:** [REDACTED]

**To:** Jerryraysmith@verizon.net,

**Subject:** Ronnie Sandlin

**Date:** Sat, Mar 20, 2021 2:50 pm

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To whom it may concern,

I have known Ronnie Sandlin for a number of years. And in those years I have known him to be soft hearted, kind, and generous. Among his peers he is known for his love of animals. He is also known to have such a heart for animals he often used his following on social media to encourage future dog owners to adopt from a pound or shelter. Ronnie has always been one to help others financially in the past in ways most would not. I've seen him front the cost of apartments for his past team members because he believed in them. I have never seen him violent or act in a way to threaten others I've only seen him search for peace.

Sincerely,

Wade G

Sent from my iPhone

RE: Ronald Sandlin Character Reference Letter

To whom it may concern:

This letter is regarding Ronald "Ronnie" Sandlin. I first met Ronnie back in 2008 through a mutual friend, however, it wasn't until 2014 where we became very good friends. From the first day I met Ronnie, he has always been kind, generous and respectful towards me and everyone else around us.

Ronnie has always helped me during my tough times and even helped me get the job I have had over the past 3 and a half years. He has never asked for anything in return.

He is kind hearted person with an entrepreneurial spirit and loves to see and help people succeed.

I have never seen him be violent and/or disrespectful to anyone regardless of their gender, race, class, political, religious, or sexual orientation.

I hope you will take this in consideration.

Thank you.

A handwritten signature in black ink, appearing to read "Pasha H.", with a horizontal line underneath the name.

Pasha H.

**From:** [REDACTED]  
**To:** Jerryraysmith@verizon.net,  
**Subject:** Fwd: Character reference letter for Ronald Sandlin  
**Date:** Mon, Mar 15, 2021 8:34 pm

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----- Forwarded message -----

**From:** **Darlene M** [REDACTED]  
**Date:** Fri, Mar 12, 2021, 9:21 AM  
**Subject:** Character reference letter for Ronald Sandlin  
**To:** <Jerryraysmith@verizon.net>

I am writing on behalf of Ronald Sandlin. I have known Ronald for over the past 15 years. I was introduced to Ronald through his mother Leighanne Dearen Sandlin who I personal trained along with her son Ronald.

During our time training, I found that Ronald and I shared the same passion for animals. Especially dogs! I have volunteered for many years in animal rescue. Ronald was always willing to help and support me wherever needed for the better of the dogs and owners. He has been nothing but dependable, caring, trustworthy and loving.

It's without a doubt if someone needed his assistance or guidance, he would be there to accommodate them.

Please feel free to contact me if you have any questions or concerns.

Sincerely,

Darlene M

**From:** [REDACTED]**To:** jerryraysmith@verizon.net,**Subject:** Ronald Sandlin**Date:** Wed, Mar 17, 2021 6:53 pm**To Whom It May Concern:**

Ronnie Sandlin has been a friend of mine for about 5 years.

We met through a mutual friend in the advertising space in Las Vegas.

Over the years I have known Ronnie to be a good guy. He is smart, helps other people out, and overall a well-rounded and good member of society.

I was very surprised (and saddened) when I heard that Ronnie was involved in the Capital building protests.

I think Ronnie, like thousands, if not millions, of other Americans got very caught up in politics with the Trump-Biden 2020 election. He clearly let his emotions take over his actions and made some bad choices.

I do believe Ronnie is a good member of society. I also do not think he should be jailed for the mistakes he made that day. Probation, yes, but I think jail may be too extreme.

Ronnie is not the type of person to be aggressive, violent, or cause harm to anyone.

I kindly ask that you make an exception in the case of Ronnie Sandlin. I hope he is not going to jail over his poor decision to get involved in politics that day.

Warm regards,

Jordan H:

Wednesday, March 17, 2021

Sent from my iPhone

**From:** ( [REDACTED] )  
**To:** Jerryraysmith@verizon.net,  
**Subject:** Ronald Sandlin Letter  
**Date:** Fri, Mar 19, 2021 2:30 pm

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Your Honor,

I am writing to ask for leniency on my friend, Ronnie Sandlin.

Ronnie is a very generous man with a big heart. While I haven't seen Ronnie in several years, the time that I have known him, he has been a very thoughtful and compassionate person. He is one of the biggest animal lovers I've known.

He has a thoughtful and caring family that loves him deeply and has adopted him and they need his help during these rough times in the world.

I do not support the actions of what occurred at the Capitol whatsoever but that's not the Ronnie I knew, and I'm sure he is regretful about all of this.

I don't know really what else to say, but please show mercy on him. I worry for his mom.

Best,  
Dan H.

Name: Michael Lauchlan

Address: [REDACTED]

Date: March 12th, 2021

Dear Sir/Madam,

I have been friends with Ronald Sandlin for over 7 years. During that time I have also done business with Sandlin many times. I am a fellow entrepreneur and business owner in Nevada. We have both been there for each other through the highs and lows of entrepreneurship, and therefore I believe that I know Sandlin very well on a personal, professional, and mental level.

Sandlin is an innovative and talented businessman. If you ask anyone that knows Sandlin how to describe him they will tell you he's an entrepreneur, albeit an eccentric one. He really embodies what it means to be an entrepreneur in America during the new tech economy. He was adopted from Mexico, dropped out of college, and built a million dollar internet business while still in his twenties. Sandlin has also been invited to speak at many events as an inspiration to entrepreneurs, especially minority entrepreneurs who see his self-made success.

I never thought I would be writing a letter like this for Sandlin. I mean, why would anyone with such a background find themselves in this particular situation? We'll, with these highpoints also come some recent low points worth mentioning. Like many people right now, Sandlin's business was recently devastated by Covid19 and his life was turned upside down. In the same year his fiancée also broke off their engagement. Of course there are many people in worse situations, but it was still a remarkable fall from grace for Sandlin that certainly took its toll on the man.

I would never label Sandlin as a political activist or an extremist. He's a moderate. In DC he wanted to show support for the president and Live Stream the protests on video for his podcast, but I believe that that is as far as he intended things to go. Again I have never known Sandlin to be an extremist or a violent person on any level whatsoever. He is also proud to be an American immigrant and I know that he has a healthy sense of patriotism for the USA.

I have had a few in-depth conversations with Sandlin after the events in DC so I can confidently tell you exactly where his mindset is at right now: He is completely done with politics, he is not a threat to anyone, and he is thinking very clearly. I believe his priorities are in the right place and that he has the potential and drive to be a hugely productive member of society again (like he was just a short time ago). Right now he has the talent, focus, and support network needed to get back on the right track very quickly if given the chance. I hope he is given that chance.

Sincerely,

X  \_\_\_\_\_

Michael L

Barbara S

[REDACTED]

March 12, 2021

Re: Ronald Sandlin 376783

To whom it may concern:

My name is Barbara Sandlin. I am a retired schoolteacher. I am Ronnie's paternal grandmother and have known him since he was adopted shortly before his fifth birthday. He has always been a kind hearted person and has rescued many animals that were injured and abandoned.

He was co-founder of Pedal Movement, a bike repair program that provides bikes for the homeless and children in a low income area of Long Beach. In addition to transportation, people are able to learn new skills repairing the bikes. He spent many hours volunteering in this nonprofit organization that is still in operation.

Ronnie is respectful, loving, and loyal. When my husband was ill with cancer, he drove several hours each weekend to help. He went home to Tennessee to take care of his dying maternal grandfather and cared for him night and day.

He recently broke up from a long relationship and was in a depressed state of mind. Our entire family was shocked to hear that Ronnie was involved in this situation. He does not have any criminal record and has not been involved in anything of this sort. This is inconsistent with Ronnie's nature. Our entire family loves Ronnie and will continue to support him.

Sincerely,

Barbara S

March 10, 2021

To Whom It May Concern:

This is a character reference for Ronald Sandlin. I have known Ronnie for over 10 years. He is a very intelligent and charismatic man, but also deeply emotional. The Ronnie I saw on TV was not the one I have known for all of these years and does not reflect him truly as a person. While I do not support the actions he took, I think he has a much greater value to society as a participant in it rather than behind bars.

Ronnie was adopted twice as a young child. Even though he was raised by a great family it is a pain that he carries with him of being unwanted. I think it has impacted a lot of his life decisions as he has felt that no one was there to support him and he constantly had to prove his worth.

Ronnie has done some amazing things for the community. In long Beach he helped to change a City law about bicycle ownership that was being used to unfairly stop cyclists. He started a bike non-profit and looked to give back and support the community through one of his passions.

Ronnie is a kind soul. I've received letters from him during this period and the pain he is experiencing is tremendous.

This is a character reference for Ronnie, and he has an outstanding one even though it seems to have been clouded lately.

Thank you for the consideration,

Sincerely,

Sabrina F

**From:** [REDACTED]  
**To:** jerryraysmith@verizon.net,  
**Subject:** Re: Letter - Invitation to edit  
**Date:** Mon, Mar 15, 2021 11:44 pm

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**Nathali F**

[REDACTED]

10 March, 2021

To whom it may concern,

I am Nathali Flores, 36 years old mother and Veteran of the United States of America. I am writing on behalf of Ronald Sadlin. I have known Ronald since 2018. I met him through my boyfriend who worked with him to build his home studio.

Ronald and his girlfriend at the time and I became pretty close. Ronald is more of a homebody so my boyfriend and I went over to their place for dinner a few times. We always had good conversations about politics, business and life. He is truly a positive smart man. He has been through a lot in his life which has made him want to always be successful and friendly.

I am a friend who would have lunch with him frequently and can truly say that his bad decision making on Feb 6th is not like him. He is someone who only wants to do well in life. He is one man I know who wants that dream house with a dream family. I never heard him talking about any time of revolt nor did he ever try to change my political views. We spoke about future business possibilities and such things. I worked for the Bernie Sanders Campaign which allowed us to have great conversations. It hurts my heart to know that he could be sentenced to time in Jail because of a heat of the moment decision.

I sincerely hope the court takes this letter into consideration at the time of sentencing. Despite the current case, I do believe Ronald Sadlin to be an honorable individual and a good human being.

**Sincerely,**

*Nathali F*

**Nathali F**

On Thu, Mar 11, 2021 at 8:14 AM Jerry Smith <jerryraysmith@verizon.net> wrote:  
Nathali,

Thanks for your letter of recommendation for Ronnie Sandlin. Unfortunately, I haven't been able to open the document. I'm not great with technology. Could I trouble you to resend the letter just as a .pdf or.docx attachment to an e-mail?

**From:** [REDACTED]  
**To:** Jerryraysmith@verizon.net,  
**Cc:** [REDACTED]  
**Subject:** The Truth About Ronnie Sandlin  
**Date:** Thu, Mar 18, 2021 10:37 am  
**Attachments:** FACEBOOK POST OF ME THANKING RONNIE FOR THE GLASSES HE GAME ME.png (473K),  
Hand written note .png (549K)

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To whom it may concern,

My name is Gerard De [REDACTED] I am from the USA but I currently live in [REDACTED] I am 50 years old and have been in online internet marketing for 18 years.

I am taking the time to share my relationship with Ronnie Sandlin and tell just one of the stories regarding Ronnie and the kind of person that he is.

To begin, Ronnie and I met online years ago on Facebook as we are both in online marketing. We actually never met in person as I am located in Bangkok Thailand and he is in the USA. We had several mutual internet friends that all said nothing but great things about him. He is well known and liked in the industry and loves helping online marketers grow their businesses.

We began chatting online and have done multiple videos since we met. But before we actually did any videos and when I barely knew him he did something completely out of the ordinary and unexpected. I need to share with you that unfortunately like in every business there are a lot of people in online marketing that have zero respect, honor or integrity. I personally have been taken in my 18 years by over a dozen people in different ventures.

So I was on Facebook and Ronnie posted a picture of an internet business dinner he was at in Las Vegas with several other top internet marketers and I messaged him and complimented him on the glasses he was wearing and he asked me for my address and said he would ship an extra pair to me. Please understand that at this point we never met in person and we never had done any business and we barely knew each other. He had zero reasons to follow up in what he said other than he is simply a man of his word and has honor and respect. He had to spend over \$100 to ship them plus the cost of the frames which were very expensive. I was completely taken back when the glasses arrived in the coming days and he even took the time for a handwritten note.

I have attached a screenshot to the post I made and I have attached a screenshot of the handwritten note he included as well in this email and a screenshot of the handwritten letter he wrote.

Here is a **Link to my Post about the glasses he shipped to me in Bangkok Thailand**

[REDACTED]

Here is a **Link to the image of the handwritten note he send with the glasses he shipped to me**

After he sent the glasses, it more than confirmed he was the great person that everyone said he was. Over the years we strengthened our friendship and always brainstormed on business ideas and just became friends. Ronnie was just kind to everyone and wanted to help people.

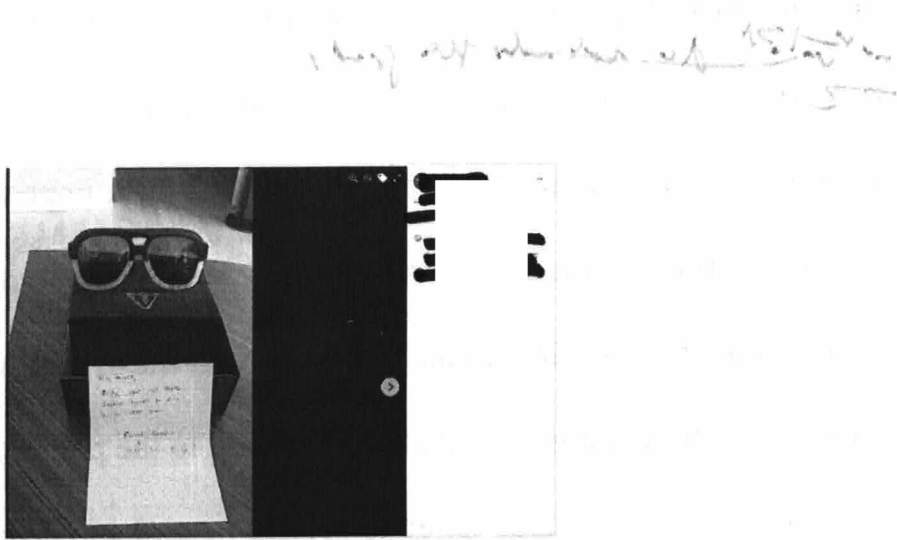
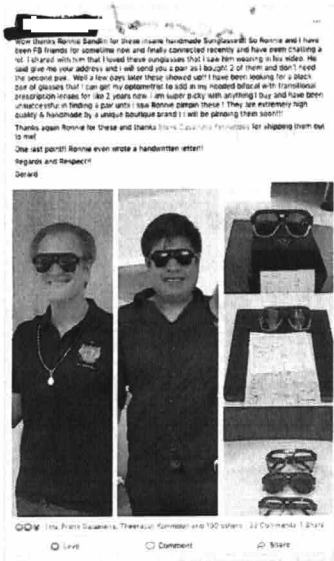
I will also be Ronnies friend as he is one of the true humans left on earth that understands respect and honor. When his situation comes to a conclusion I will be here for him and would love to partner with him on any of my online ventures and help him in any way possible as the earth needs him free to help people.

Respectfully

Gerard

Gerard A. D

2 Attached Images



**From:** [REDACTED]  
**To:** Jerryraysmith@verizon.net,  
**Subject:** Ronald Sandlin  
**Date:** Thu, Mar 11, 2021 11:22 pm

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To whom it may concern~

I am writing to you about Ronald Sandlin. I have known Ronnie since he was first adopted by Leigh Anne & Steve Sandlin. I have known Leigh Anne and Steve for 30 plus years. Leigh Anne and I worked at a small Lutheran school in South Gate, California. This little boy was very much wanted and loved by his parents, grandparents, and other family members. He was truly a blessing to his parents and a dream come true. He grew up in a very stable, and loving Christian home. His mother a teacher and his father an Engineer. He attended Lutheran schools during his elementary and junior high years. His parents have always been involved in their church, and have been good role models.

Ronald was a very happy and stable young man growing up. His parents were very involved in his life and making sure he was well taken care of. Ron loves animals especially dogs. He owns two dogs of his own. He has been a great dog dad and very responsible.

I can not speak about Ron's adult life since I have not seen him in a while, but I can tell you that he had a wonderful childhood. Leigh Anne and I communicate on a daily basis, and the usual topic of conversation is our children and grandchildren.

When I learned about what had happened I was completely in shock since this is so out of character for Ron. I know that his parents are very distraught over this whole situation. They have been model parents, and have given Ron a great deal of love and support. They continue to love and support their son through these trying times.

I truly believe that Ron is capable with the right guidance of getting past this whole ordeal and becoming a good citizen in our community.

I am praying for him and his family during this very difficult time.

Best regards,

Anaelisa C