UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)(	
	)(	**Criminal No. 21-204 (BAH)**
v.	)(	**Chief Judge Howell**
	)(	**Trial: August 1, 2022**
MATTHEW BLEDSOE	)(	

REPLY TO GOVERNMENT'S RESPONSE
TO DEFENDANT'S MOTION TO DISMISS

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully replies to the Government's Response to Defendant's Motion to Dismiss. In support of this reply, Mr. Reply would show:

1. On March 31, 2022, Matthew Bledsoe filed a Motion to Dismiss Count One of Indictment for Failure to State an Offense and Points and Authority in Support Thereof (ECF #168) (Motion to Dismiss). In the Motion to Dismiss, Mr. Bledsoe argues that, in charging him with Obstruction of an Official Proceeding under 18 U.S.C. § 1512(c)(2), count one of the indictment in his case fails to state an offense for two different reasons. First, it alleges conduct in violation of the provision that is actually beyond its reach. Motion to Dismiss at 2-22. Second, it alleges that the "official proceeding" at issue was the hearing held at the United States Capitol on or about January 6, 2021—i.e., the congressional hearing to count the Electoral College votes from the recent presidential election. However, this hearing does not qualify as an "official proceeding" for the purposes of § 1512. Id. at 22-32.

2. On April 22, 2022, the government filed a Government's Response to Defendant's Motion to Dismiss (ECF #179) (Response). In this Response, the government makes a number of points that Mr. Bledsoe now addresses.

The Relationship between § 1512(c)(1) and § 1512(c)(2)

3. In his Motion to Dismiss, Mr. Bledsoe points out that Congress used the "or… otherwise" construct to link 18 U.S.C. § 1512(c)1) and 18 U.S.C. § 1512(c)(2) so that they could work together to identify conduct that can then become criminal under 18 U.S.C. § 1512(c) if it is engaged in corruptly. Motion to Dismiss at 5-6. Mr. Bledsoe further points out that, by doing this, Congress was therefore showing that it intended for the general language of § 1512(c)(2) to only be understood as describing conduct that resembles the specific acts listed in § 1512(c)(1) in some way other than just being conduct that affects or can affect an official proceeding. Id. at 6-9. Accordingly, he points out that, in charging him under § 1512(c)(2) for conduct that does not resemble the specific acts listed in § 1512(c)(1) in any way other than being conduct that affects or can affect an official proceeding, count one of the indictment against him fails to state an offense. Id. at 3.

4. In its Response, to support its assertion that § 1512(c)(2) does in fact reach the conduct that Mr. Bledsoe is charged with, the government asserts that § 1512(c)(2) "serves as a comprehensive prohibition on corrupt conduct that intentionally obstructs or impedes an official proceeding." Response at 7. The government then goes on to assert that "[t]he verbs Congress selected in Section 1512(c)(2) [obstruct, influence, and impede] reach broadly." Id. Indeed, in regards to the verbs "obstruct" and "impede," the government indicates that they can "refer to anything that the 'blocks,' 'makes difficult,' or 'hinders.'" Id. (quoting Marinello v. United States, 138 S.Ct. 1101, 1106 (2018) (citing dictionaries)). Also, in regards to the verb "influence," the government indicates that it "includes 'affect[ing] the condition of' or 'hav[ing] an effect on.'" Id. (quoting Oxford English Dictionary, available at http://www.oed.com). Accordingly, the government concludes that the "string of verbs in Section 1512(c)(2) are properly viewed as 'expansive' in their coverage." Id. (citing United States v. Burge, 711 F.3d 803, 809 (7th Cir. 2013)). This is consistent with the government's repeated characterization of §1512(c)(2) as a general "catch-all" provision. See, e.g., id. at 9, 11, 12. This is also consistent with the government's view that, in connection with the events of January 6, Mr. Bledsoe

violated § 1512(c)(2) because he "hindered and delayed… the certification of the Electoral College votes." Id. at 10.

5. In an apparent attempt to explain why Congress would create a broad, general catch-all provision for all conduct that could have effect on an official proceeding in § 1512(c)(2) immediately after going out of its way to emphasize only a few specific acts that form a distinct subset of such conduct (acts related to the destruction of "document[s], record[s], or other object[s]") in § 1512(c)(1), the government argues "Section 1512(c)(2) criminalizes the same result prohibited by Section 1512(c)(1)—obstruction of an official proceeding—but accomplished by a different means—i.e., some conduct other than destruction of a document, record, or other object." Response at 21 (emphasis in original). Thus, in the government's view, "Section 1512(c)(2) [serves] as a catch-all for corrupt obstructive conduct not covered by Section 1512(c)(1). Id. at 11 (emphasis added).

6. As an initial matter, it must be noted that the government is incorrect that § 1512(c)(2) applies to conduct that is "corrupt." As Mr. Bledsoe points out in his Motion to Dismiss, § 1512(c)(2)—like § 1512(c)(1)—identifies conduct that affects or can affect an official proceeding without regard to whether or not such conduct is corrupt. Motion to Dismiss at 4-5. While the conduct identified in § 1512(c)(1) and § 1512(c)(2) would become criminal under § 1512(c) if it is engaged in "corruptly," neither § 1512(c)(1) nor § 1512(c)(2) are, in and of themselves, concerned with whether or not the conduct they identify is corrupt, nor do they criminalize any conduct on their own. They simply identify conduct that can then become criminal under § 1512(c) if it is engaged in corruptly. See id. More importantly, beyond this, the government is incorrect in claiming that Congress meant for § 1512(c)(2) to apply to all conduct that can have an effect on an official proceeding that is not covered by § 1512(c)(1).

7. By its own admission, the government agrees with Mr. Bledsoe that Congress intended for § 1512(c)(1) and § 1512(c)(2) to work together to identify the conduct that is subject to being criminalized under § 1512(c). While the government claims that Congress intended for the two provisions to work together in such a way that § 1512(c)(2) applies to all conduct that

can have an effect on an official proceeding that is not among the specific acts of such conduct listed in § 1512(c)(1) and while Mr. Bledsoe claims that Congress intended for the two provisions to work together in such a way that § 1512(c)(2) applies only to unspecified conduct that can have an effect on an official proceeding that is exemplified by the specific acts of such conduct listed in §1512(c)(1), both the government and Mr. Bledsoe still agree that Congress did intend for the two provisions to work together to identify the conduct that is subject to being criminalized under § 1512(c). However, unlike Mr. Bledsoe's understanding of how § 1512(c)(1) and § 1512(c)(2) work together to identify conduct that can become criminal under § 1512(c), the government's understanding of how they work together to identify that conduct does not make sense.

8. If as the government claims, Congress intended for § 1512(c)(1) and § 1512(c)(2) to work together in such a way that § 1512(c)(2) applies to all conduct that can have an effect on an official proceeding that is not already covered by the specific acts of such conduct listed in § 1512(c)(1), then it was obviously intending for § 1512(c)(1) and § 1512(c)(2) to work together to identify the universe of conduct that can have an effect on an official proceeding, thus subjecting that universe of conduct to criminalization under § 1512(c). But if this is really what Congress intended, why then, when it enacted § 1512(c), did it even bother to include § 1512(c)(1) along with § 1512(c)(2) in § 1512(c)'s scheme in the first place? It would have been much more logical and clearer to just have § 1512(c)(2) be the sole provision that identifies the conduct that can become criminal under § 1512(c) and leave it at that. This is because, if there were no § 1512(c)(1), § 1512(c)(2) would already be automatically covering the universe of conduct that can have an effect on an official proceeding all on its own. Indeed, if Congress had in fact intended to subject to criminalization, under § 1512(c), the universe of conduct that can have an effect on an official proceeding, it would have actually been misleading of it to go out of its way, in § 1512(c)(1), to include only a few specific acts that form a distinctly identifiable subset of such conduct—that is, only acts related to the destruction or alteration of documents or evidence. Thus, in order to recognize that Congress must have had a purpose besides just misleading

people for putting § 1512(c)(1) along with § 1512(c)(2) into §1512(c)'s scheme, the government's reading of § 1512(c)(2) as a "catch-all for corrupt obstructive conduct not covered by Section § 1512(c)(1)" must be rejected.

9. Given that Congress must have had a purpose besides just misleading people for putting § 1512(c)(1) along with § 1512(c)(2) into § 1512(c)'s scheme, the logical explanation for the fact that Congress used § 1512(c)(2) to describe the conduct it concerns in general terms is that it wanted it to cover unspecified conduct that can have an effect on an official proceeding that, though unspecified, is still of a type with the specific acts of such conduct that are listed in § 1512(c)(1). Understanding § 1512(c)(2) in this way of course supports Mr. Bledsoe's view that § 1512(c)(2) can only be read to reach conduct that resembles the specific acts listed in § 1512(c)(1) in some way other than just being conduct that affects or can affect an official proceeding, Moreover, it gives § 1512(c)(1) the role of exemplifying the specific type of conduct that affects or can affect an official proceeding that Congress intended to reach with § 1512(c) as whole, thus explaining why Congress bothered to include § 1512(c)(1) along with § 1512(c)(2) in § 1512(c)'s scheme in the first place.[1] Accordingly, it makes considerably more sense than the government's view that Congress intended for § 1512(c)(2) to reach all conduct that can have an effect on an official proceeding not covered by § 1512(c)(1)—a view that still has the universe of all conduct that can have an effect on an official proceeding being subject to criminalization under § 1512(c) and is thus completely at odds with the fact that Congress thought it important to put § 1512(c)(1) along with § 1512(c)(2) into § 1512(c)'s scheme.

10. In its Response, the government takes 26 pages to defend its position that Congress intended for § 1512(c)(1) and § 1512(c)(2) to work together in such a way as to have § 1512(c)(2) apply to all conduct that can have an effect on an official proceeding that is not

[1] It is perhaps worthwhile to point out here that, because the specific acts listed in 1512(c)(1) form a distinctly identifiable subset of conduct that can effect an official proceeding (conduct involving the destruction or alteration of documents and evidence), they cannot be meaningfully said to exemplify, as a general matter, all conduct that can have an effect on an official proceeding—just as a list of only types of ships cannot be meaningfully said to exemplify all conveyances (from rickshaws to rocket ships) or a list of only types of birds can be meaningfully said to exemplify all organisms (from amoebas to aardvarks).

among the specific acts of such conduct listed in § 1512(c)(1), see response at 6-31, yet in doing this, the government utterly fails to explain why, if Congress thus intended to subject to criminalization, under § 1512(c), the universe of conduct that can have an effect on an official proceeding, it even bothered to include § 1512(c)(1) along with 1512(c)(2) in § 1512(c)'s scheme. This is the white elephant in the room that the government's arguments avoid addressing.

Ejusdem Generis and Noscitur a Sociis

11. In his Motion to Dismiss, Mr. Bledsoe points out that his view that Congress only intended for § 1512(c)(2) to reach conduct that resembles the specific acts listed in § 1512(c)(1) in some way other than just being conduct that affects or can affect an official proceeding is also consistent with viewing the two provisions in relation to each other with the interpretive canons of ejusdem generis and noscitur a sociis.

12. In its Response, the government argues that § 1512(c)(2) stands apart from § 1512(c)(1) and that it should not therefore be interpreted in light of it, thus making it unnecessary to determine the reach of § 1512(c)(2) by using the interpretive canons of noscitur a sociis and ejusdem generis to view it in relation to § 1512(c)(1). Response at 20-30. However, in making this argument, the government conveniently ignores the fact that even its view of § 1512(c)(2) is based on interpreting that provision in relation to § 1512(c)(1)—that is, by reading it to cover all conduct that can have an effect on an official proceeding that is not already covered by § 1512(c)(2). Given that even the government acknowledges that the two provisions must be interpreted in relation to each other, its claim that the interpretive canons of ejusdem generis and noscitur a sociis are inapplicable in this context makes little sense. After all, all that those interpretive canons do is provide tools for understanding statutory language in relation to other statutory language it is associated with.

13. Beyond this, as Mr. Bledsoe points out in his Moton to Dismiss, the Supreme Court has indicated that application of the ejusdem generis canon is particularly appropriate

when it serves to insure that statutory language does not render other statutory language it is associated with meaningless. Motion to Dismiss at 11-12 (citing Yates v. United States, 135 Sc.D. 1074, 1089 (2015). Here, the government would have § 1512(c)(2) be read to reach all conduct that can have an effect on an official proceeding that is not already covered by the specific acts listed in § 1512(c)(2) such that the universe of all conduct that can have an effect on an official proceeding is subject to being criminalized under § 1512(c). But again, if that it really what Congress intended, it would have had no reason for even including § 1512(c)(1) in § 1512(c)'s scheme in the first place. Thus, using the interpretive canon of ejusdem generis to understand § 1512(c)(2) in relation to § 1512)(c)(1) is particularly appropriate. This is because using it in this way supports a reading of § 1512(c)(2) that only has it reaching conduct that resembles the specific acts listed in § 1512(c)(1) in some way other than just being conduct that affects or can affect an official proceeding, thus affording § 1512(c)(1) the role of exemplifying the specific type of conduct that affects or can affect an official proceeding that Congress was subjecting to criminalization under § 1512(c) as a whole. Unlike the government's reading of § 1512(c)(2), this reading of the provision gives § 1512(c)(1) a purpose in § 1512(c)'s scheme.

Legislative History

14. In its Response, the government argues that the broad reading it gives § 1512(c)(2) is supported by the legislative history of the current 18 U.S.C. § 1512(c). Response at 14-17. The government points out that, before the enactment of the current § 1512(c), 18 U.S.C. § 1512 only "made it a crime to induce 'another person to destroy documents, but not a crime for a person to destroy the same documents personally'—a limitation that 'forced' prosecutors to 'proceed under the legal fiction that the defendants [in the then-pending United States v. Arthur Andersen] are being prosecuted for telling other people to shred documents, not simply, for destroying evidence themselves.'" Response at 15-16 (quoting S. Rep No 107-146 at 6-7). The government then notes that the current version of § 1512(c) was thus enacted because it "'broadened' Section 1512 by permitting prosecution of 'an individual who acts alone in

destroying evidence.'" Id. at 16 (quoting 148 Cong. Rec. S6550 (daily ed. July 10, 2002) (statement of Sen. Hatch)). The government then goes on to argue that this shows that, in enacting the current § 1512(c), Congress meant for it to reach all "firsthand obstructive conduct" that might affect an official proceeding just as a general matter—not just conduct related to documents and evidence—and thus for § 1512(c)(2) to be given the broad reading that it gives the provision. Id. at 17.

15. The government's conclusion that the legislative history of § 1512(c) shows that Congress intended for it to reach all "firsthand obstructive conduct" as a general matter is grossly overstated. By the governments' own admission, the legislative history of the current § 1512(c) shows that the only reason Congress even wanted to have the provision address "firsthand obstructive conduct" in the first place was to protect documents and evidence from destruction and alteration by making sure that that the people who personally do the destroying or altering are held accountable. The legislative history thus shows that Congress's purpose in enacting the current § 1512(c) was to better protect documents and evidence that could be used at an official proceeding from being altered or destroyed—not to criminalize all "firsthand obstructive conduct" just as general mater. Thus, far from supporting the broad reading that the government gives § 1512(c)(2), the legislative history of the current § 1512(c) actually supports the narrower reading of § 1512(c)(2) that Mr. Bledsoe gives it.

Overbreadth

16. In its Response, the government asserts that, in his Motion to Dismiss, Mr. Bledsoe "suggests… that Section 1512(c)(2) violates dues process and does not provide adequate notice." Response at 17. This is incorrect. In his Motion to Dismiss, Mr. Bledsoe does not claim that § 1512(c)(2) violates due process or fails to give adequate notice. Rather, he points out that the reading that he gives the provision must be accepted over the one that the government is using to prosecute him because, unlike his reading of the provision, the

government's reading of it results in it being understood in a way that causes it to be violative of due process—both because it causes § 1512(c), as a whole, to not give fair notice of the conduct that it is making criminal and because it covers such a wide gamut of conduct that it allows arbitrary prosecution. Motion to Dismiss at 17-22. On this point, it should be stressed that the government's claim that § 1512(c)(2) should be read to apply to all conduct that can have an effect on an official proceeding that is not among the specific acts of such conduct listed in § 1512(c)(2) just validates Mr. Bledsoe's point. It is perhaps worthwhile to emphasize here the notice problem that the government's reading of § 1512(c)(2) creates.

17. If as the government would have it, § 1512(c)(2) is read to include all conduct that can have an effect on an official proceeding that is not among the specific acts of such conduct listed in § 1512(c)(2), then § 1512(c)(1) and § 1512(c)(2) would end up working together to identify the universe of conduct that can have an effect on official proceeding in order to subject it to criminalization under § 1512(c) (if it is engaged in corruptly). However, as already noted, if Congress had intended to subject the universe of conduct that can have an effect on an official proceeding to criminalization under § 1512(c), then it would have had no reason to go out if its way, in § 1512(c)(1), to include only a few specific acts that form an identifiable subset of such conduct—that is, acts related to the destruction and alteration of documents and evidence. Accordingly, seeing that Congress did in fact go of its way include those few specific acts in § 1512(c)(1), a person might reasonably assume that Congress must have had a purpose in doing so and thus conclude that it did not in fact intend to subject the universe of conduct that can have an effect on an official proceeding to criminalization under § 1512(c). Accordingly, if § 1512(c)(2) were read to cover all conduct that can have an effect on an official proceeding that

is not among the specific acts of such conduct listed in § 1512(c)(1), then § 1512(c), as a whole, would not provide fair notice of the conduct that it is criminalizing.

Rule of Lenity

18. In his Motion to Dismiss, Mr. Bledsoe argues that the rule of lenity requires finding that the reading he gives § 1512(c)(2) must be preferred over the reading that the government gives it. Motion to Dismiss at 21-22. In its Response, the government argues that, because its reading of § 1512(c)(2) is clearly correct, the rule of lenity is inapplicable. Response at 28-30. The government's assertion that its reading of § 1512(c)(2) is clearly correct is at the very least questionable. Because this is so, even if the Court doubts that Mr. Bledsoe's reading of the provision is correct, the rule lenity still requires that the Court go with his reading over the government's reading.

19. Under the government's reading of § 1512(c)(2), Congress intended for that provision to work with § 1512(c)(1) in a such way that § 1512(c)(2) applies to all conduct that can have an effect on an official proceeding that is not among the specific acts of such conduct listed in § 1512(c)(1). The government thus understands § 1512(c)(2) to be working with § 1512(c)(1) to subject to criminalization, under § 1512(c), the universe of conduct that can have an effect on an official proceeding. However, if Congress did in fact intend to subject to criminalization, under § 1512(c), the universe of conduct that can have an effect on an official proceeding, it would have no reason to make § 1512(c)(1) and § 1512(c)(2) work together to identify that conduct. It would simply have had § 1512(c)(2) stand alone to identify that conduct. This is because, if there were no § 1512(c)(1), then § 1512(c)(2) would already be automatically covering that universe of conduct all on its own. The government's reading of § 1512(c)(2) thus fails to account for why Congress even bothered to include § 1512(c)(1) in § 1512(c)'s scheme, a fact that, at the very least, renders its reading of § 1512(c)(2) less than conclusive.

20. In at least two different January 6 cases now, the Honorable Carl Nichols has found that that the conduct described in § 1512(c)(2) is limited in scope by § 1512(c)(1) along the same lines that Mr. Bledsoe says it is and in a way that is inconsistent with the government's view that § 1512(c)(2) is a catch-all for all conduct that can have an effect on an official proceeding that is not among the specific acts of such conduct listed in § 1512(c)(1). In these cases, Judge Nichols had dismissed the count under § 1512(c)(2) against the respective January 6 defendants. See Memorandum Opinion at 28-30 (ECF #72), United States v. Garret Miller, 21-cr-119 (CJN) (March 7, 2022); Memorandum Opinion at 7-8 (ECF#64), United States v. Joseph W. Fischer, 21-cr-234 (CJN) (March 15, 2022). While Judge Nichols' view of § 1512(c)(2) is obviously not binding on this Court, it is being referenced here because it further shows that, at the least, the government's view of § 1512(c)(2) is not as clearly correct as it says it is.

Nexus to Tangible Evidence

21. In its Response, in an apparent attempt to argue that, even if the Court accepted Mr. Bledsoe's reading of § 1512(c)(2), the conduct he is alleged to have engaged in would still be covered by the provision, the government points out that Mr. Bledsoe is charged with conduct that interfered with "Congress's ability to review documents that it was statutorily required to receive and act upon." Id. at 30. The government then goes on to make clear that the documents that it is talking about are the certificates from the States announcing which candidates they have awarded their Electoral College votes to. Id. at 30-31. Apparently, in the government's view, interfering with Congress' ability to review the states' certificates is conduct that resembles the specific acts listed in § 1512(c)(1) in some way other than just being conduct that affects or can affect an official proceeding. This appears to be because that conduct has "'some nexus to tangible evidence'… or a 'tangible object.'" Id. at 30 (citations omitted). This argument is extremely strained.

22. As an initial matter, it must be noted that, in count one of the indictment against him, Mr. Bledsoe is not charged with obstructing a proceeding before Congress by interfering

with its ability to review documents. Rather, he is charged with obstructing a proceeding before Congress by "entering and remaining in the United States Capitol without authority and threatening Congressional officials." Indictment at 1 (ECF #23). Moreover, even if he were charged with obstructing a proceeding before Congress by interfering with its ability to review documents, his conduct would still not resemble the specific acts listed in 1512(c)(1). This is because the specific acts listed in 1512(c)(1) only concern conduct that is directed at documents and evidence that can be used at an official proceeding—not conduct directed at the official proceeding in which the documents would be reviewed. 18 U.S.C. § 1512(c)(1). Beyond this, even if it could be said that interfering with a congressional proceeding's ability to review documents does, as general matter, resemble the specific acts listed in § 1512(c)(1), interfering with Congress' ability to specifically review states' certificates regarding their electoral votes still could not be said to resemble those acts. This is because those certificates are not documents that Congress even reviews in any meaningful sense.

23. The certificates that the states submit to formally announce who they have awarded their Electoral College votes are not submitted to prove any contested point. They are simply formal, ceremonial announcements of what is already known. It is true that Congress can decide not to accept a certificate of Electoral College votes submitted by a state, but this is the case only under two circumstances. First, Congress can reject a state's certificate of electoral votes when it determines that the votes at issue "have not been regularly given by the electors whose appointment has been lawfully certified" pursuant to the state's laws. 3 U.S.C. § 15; see 3 U.S.C. § 6. Second, in those instances where a state submits more than one certificate of electoral votes, Congress can pick one certificate and thus reject any others by determining which certificate actually reports votes that have "been regularly given by the electors who are shown… to have been [legally] appointed" by the state at issue. 3 U.S.C. § 15; see 3 U.S.C. § 5. However, in either instance, Congress is simply deciding if the electors whose votes the certificates under review announce are in fact proper electors. It is not making any determination regarding the accuracy of the information contained in the certificates—that is, any

determination about whether the certificates accurately tally the electors' votes. Thus, the states' certificates of Electoral College votes are simply not documents that Congress even reviews in any meaningful sense.

Official Proceeding

24. In his Motion to Dismiss, Mr. Bledsoe argues that the congressional hearing to count the Electoral College votes is not an "official proceeding" as that term is defined in 18 U.S.C. § 1515(a)(1) for the purposes of 18 U.S.C. § 1512(c)(2). Motion to Dismiss at 22-32. Mr. Bledsoe points out that that the term "official proceeding" is intended to refer to court-like proceedings related to the administration of justice where witnesses and evidence can be secured to aid the adjudicative decision-making that needs to be done. Id. at 23-29. He points out that a hearing to count the Electoral College votes does not even have the ability to secure testimony and evidence and that what limited decision-making ability it does possess can only be informed by debate and the application of certain hierarchical rules. Id. at 30-31. Also, he points out that it is not a hearing related to the administration of justice. Id. at 31.

25. In its Response, in arguing that a congressional hearing to count the Electoral College votes is an official proceeding for the purpose of § 1512(c)(2), the government stresses the "solemn and formal" nature of Joint Sessions of Congress as a general matter, Response at 5, and points out some of the elaborate rules of protocol that specifically attend a hearing to count the Electoral College votes—even pointing out how the participants in the hearing are required to sit in certain places based on their status, id. at 6. But while the fact that a hearing to count the Electoral College votes is heavy on ceremony and pomp may make it seem like an "official proceeding" in some general sense, it does not make it an "official proceeding" in the more clinical and legal sense that § 1512(c)(2) uses the term.

CONCLUSION

WHEREFORE, the defendant, Matthew Bledsoe, replies to the United States' Response to Defendant's Motion to Dismiss.

Respectfully submitted,

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