

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>Vs.</b>	)	<b>CASE NO: 21-CR-365-001</b>
	)	<b>21-CR-365-002</b>
<b>DOUGLAS K. WANGLER</b>	)	
	)	
<b>Defendant</b>	)	
	)	
<b>And</b>	)	
	)	
<b>BRUCE J. HARRISON</b>	)	
	)	
<b>Defendant</b>	)	

**JOINT DEFENDANT’S SENTENCING MEMORANDUM**

Now comes the Defendants, DOUGLAS WANGLER and BRUCE HARRISON, by their attorney, BAKU N. PATEL of PATEL LAW, P.C., and for their Joint Sentencing Memorandum states as follows:

The Defendants, DOUGLAS WANGLER and BRUCE HARRISON, are hereby requesting the Court to:

1. Sentence each to a period of probation;
2. Not impose any imprisonment time;
3. Not impose any fines but agree to pay the agreed upon \$500 restitution

Douglas Wangler and Bruce Harrison went to the U.S. Capitol to attend a rally hosted by then President Donald Trump. Their sole purpose in driving to Washington D.C. was to witness history as promised by former President Trump. They did not go to cause harm to anyone or cause any property damage to any facilities. When the large group of protestors were initially trying to enter the main entrance of the Capitol Building, they both walked around the building

itself, never trying to enter the main part with the large mob or engage in any acts with the Capitol Police. When walking, they saw a door that was already open and entered the Crypt area where they remained for about 12 minutes, majority of which was trying to locate the exit after taking a couple of pictures. Upon further reflection, Mr. Wangler and Mr. Harrison each regret, not only entering the Crypt, but even traveling to Washington D.C. They are truly remorseful of what each of them did and will make an appropriate statement expressing such at sentencing.

Neither Mr. Wangler nor Mr. Harrison have any criminal history, not even a traffic ticket. This case is the only indiscretion in each of their lives.

Mr. Wangler works full-time and is a valuable and trusted employee at Rogers Roofing. In fact, his employer along with several family members provided the resources to retain undersigned Counsel. Paragraph 71 of his PSR clearly indicates how much his employer values Mr. Wangler's work and employment. Furthermore, Mr. Wangler maintains a very close relationship with his ex-wife as noted throughout the PSR who also corroborates his character as being caring, loving and non-violent. He is also close with his adult children. His son, Evan, lives partially with him. Finally, he cares for his elderly and disabled mother even though he also suffers from Lyme disease which has been taking a substantial toll on his overall health. Incarceration would be very difficult on him physically and mentally.

Mr. Harrison also works full-time and is a main provider to his family and children who rely on his support. He is happily married to his current wife of 24 years and raising their 3 children together. Two of the children are still in school. He has always maintained gainful employment and is very successful at his current job at Varian Medical Systems where he has been employed for the past 19 years. He volunteers in his community and coaches' youth football. Nothing in his life or past suggests that he would not successfully complete a term of probation. In Mr. Harrison's case, incarceration would negatively impact his family as he is a major provider of income to support this wife and children. A letter provided to Probation by the President of the Oakwood Youth Football Board speaks volumes as to the character of Mr. Harrison: "He is passionate about volunteering in the community. He enjoys teaching kids the

value of being a part of a team. He always presents himself professionally and has proven to be an upstanding member of the community.”

Both Mr. Wangler and Mr. Harrison immediately cooperated with the FBI. They voluntarily submitted to separate interviews and each were ultimately corroborated by the FBI as being completely truthful. Both turned over all electronic devices (the ones each possessed on January 6 and any new devices purchased or upgraded thereafter). They also provided password access for the FBI to review them and not one web search, picture, text or any other form of communication was located to link either to any “target groups”, e.g. Proud Boys or Oath Keepers in particular. At a second proffer requested by the Government, they turned over the clothing worn on January 6, 2021 and also allowed agents access to all social media accounts, though nothing of concern was located. By doing so, they saved the Government substantial time in obtaining challenging subpoenas to social media companies to get access to personal accounts. Thereafter, they very timely pled guilty and did not attempt to diminish any responsibility by challenging jurisdiction or filing motions to dismiss. They wanted to accept responsibility and express regret attending the rally, and, of course, entering the Capitol Building. It is Counsel’s belief their extensive cooperation and very timely guilty pleas led the Government to enter into a written plea agreement allowing both to plead guilty to Count 4, a petty offense, and recommend probation.

WHEREFORE, the Defendants, DOUGLAS WANGLER AND BRUCE HARRISON, respectfully requests the Court consider the above factors and sentence each to a term of probation without incarceration and pay \$500 restitution.

s/Baku N. Patel  
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<b>BRUCE J. HARRISON,</b>	)	
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<b>Defendant</b>	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on December 6, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

United States Attorney  
District of Columbia

Respectfully submitted,

s/Baku N. Patel  
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