

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

WILLIAM REID,

Defendant.

Crim. Action No. 21CR316(DLF)

**SECOND SUPPLEMENT TO SENTENCING MEMORANDUM**

William Reid respectfully submits this second supplement to his Memorandum in aid of Sentencing. *See* ECF. No. 36. (Def. Memo), ECF. No. 37 (First Supplement), ECF. No. 42 (Reply to Response).

In their respective memoranda, the parties pointed to other sentences imposed on defendants convicted of 18 U.S.C. §1512(c)(1) and other related counts. The defense has argued that the government's request of 78 months is excessive in view of Mr. Reid's conduct on January 6, his history and characteristics, and when compared to sentences imposed in other January 6 cases. Undersigned counsel has since become aware of additional obstruction of justice cases that further underscore how patently unreasonable the government's request is. Those cases include:

*United States v. Bledsoe*, 21CR204 (BAH): defendant was convicted after a jury trial of obstruction of justice and related charges sentenced to **48 months**, despite having scaled the walls of the Capitol Building and testifying falsely in his own defense. While in the Capitol, Bledsoe yelled "we in this bitch," and "we pay for this shit." Bledsoe later characterized his time in the Capitol as "wild" and "fun." In that

case—unlike in Mr. Reid’s case—Bledsoe failed to accept responsibility, showed a lack of remorse, and failed to comply with conditions of release. *See* ECF. No. 228.

*United States v. Dustin Thompson*, 21CR161 (RBW): defendant was also convicted after a jury trial of obstruction of justice and related charges for entering the Capitol, ransacking the Office of the Parliamentarian and stealing a coat rack and a bottle of bourbon. He also picked a cell phone up off of a staffer’s desk. Defendant also testified falsely in his own defense. *See* ECF. No. 119. For all of this, Judge Walton imposed a sentence of **36 months**.

*United States v. Matthew Miller*, 1:21CR74 (RDM) defendant pleaded guilty to obstruction of justice and sentenced to **33 months** where conduct included throwing a full beer can in the direction of police while draped in a Confederate flag. Miller also assisted other rioters in scaling the walls and other obstacles to get to the Capitol. Miller raised his hands and yelled at rioters to “push” against the tunnel entrance that law enforcement were trying to secure. Miller threw batteries towards the tunnel where police were guarding. Finally, Miller *used a fire extinguisher to spray directly on to police officers securing the tunnel*. According to the DOJ press release, several officers were impacted by this assault.

These cases and the several others cited in the defense Memorandum and First Supplement, as well as several other cases counsel will be prepared to discuss at the hearing, show that the defense request for Mr. Reid is fair and just while the government’s request is unreasonable and unwarranted.

Respectfully submitted,

A. J. Kramer  
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