

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

KENNETH HARRELSON

Defendant

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Criminal No. 1:22-cr-00015-APM

USA v. Stewart Rhodes, et al.

EXHIBIT C – MISSING DISCLOSURES FROM KNOWN PERSONS SEARCHED

Reviewing status changes of material witnesses and/or others that were referenced in Harrelson’s original motion at ECF 127-2 (withdrawn), filed again in Harrelson’s motion at ECF 225-3, incorporated by reference in the underlying Brady motion (ECF #268), undersigned counsel has reviewed the public record and determined that the below changes have occurred that must have resulted in discoverable Brady information being created since many of these individuals can be seen on video (public and non-public) actively engaging in the crimes that have been falsely foisted upon Harrelson.

The following shows changes made since July to individuals first reference in 225-3 with those referenced as “identified” being officially identified or referenced by Sedition Hunters as being “identified.” As a rule, the Relativity database is devoid of any valuable information about the subjects below or individuals referenced in ECF 225-2 (that defense counsel was forced to identify himself without government assistance relying only on public information). Aside from notable exceptions (Baouche, Ridge, Epps where there are minimally helpful FBI 302’s in extremely narrow and limited areas that are not likely to be accurate reflections of the investigation), the Relativity database is devoid of information we have been making urgent appeals for. We have no email or communications, no agent summations of same, no agent reports on affiliations, funding, networks, etc. No references to travel arrangements or efforts to track defendants and their associates.

In most of these cases we see tips information going back to January 2021 with long gaps to arrest. Providing defendants with all tips information does not comply with Brady obligations. Any reasonable defense counsel would expect and expect to receive a myriad of agent reports, but productions in this regard never seem to come. For instance, pre-trial services files and probation files could clarify many of these issues, but nothing ever seems to be disclosed. In addition to a blockade seemingly erected keeping out FBI information from disclosure, there are no reports we can find from any other federal investigative agencies (Homeland Security or any of the military intelligence agencies--DCIS, USAF-OSI, Army-CID, etc.) to include any other inspector general as far as undersigned counsel is able to determine.

While searching the Relativity database remains virtually useless for meaningful review of Brady information, we can say that undersigned counsel cannot confirm that any new information (or old information) has been provided in response to months of entreaties about almost all the individuals listed below although there is overwhelming evidence that the government has generated reams of discoverable information regarding same.

THIS INFORMATION IS CORE TO DEFENDANT HARRELSON'S DEFENSE. Any effort to continue forward without this information will result in the conviction being overturned. The entire justice system is premised on every man being presumed innocent and being entitled to any and all Brady information.

On August 25, 2022, undersigned counsel did the following "spot checks" of the Government's Relativity database: "Dunfee," "Clayton Norris," "McAlanis" "Dillard," "Ridge,"¹¹ "Timothy Allen Hart," "Gionet," "Alam," DiGangi yielded almost no content (anonymous tips and a record that the name was included comprised the largest group of positive results), but by and large the Relativity database continues to be non-responsive to most all of undersigned counsel's Brady discovery requests.

A) PLEA DEALS

The following persons operating in the vicinity of these Defendants show recent plea deals entered into by:

Edward McAlanis – Plea Deal; charged with misdemeanors; conduct not accurately depicted in charging documents

Leonard Ridge IV – Plea Deal

Jeremy Baouche – Plea Deal (8/25/22 – No details yet)

Ricky Willden – Plea Deal (Assault)

Baked Alaska – Plea Deal; pretrial release; sentenced

Hunter Ehmke – Plea Deal; pre-trial release; charged with misdemeanors

George Tenney – Plea Deal

However, the Government has not provided any significant disclosures on these persons, as would be expected.

¹¹ The Government provided us with some discovery through Box.

B) RECENT ARRESTS / CHARGES

Insider809 – Identified; charged with misdemeanors

James Haffner – Arrested/Unindicted; pre-trial release

John Sullivan – Indicted; pre trial release

TealScrambler Daniel Leyden – Arrested - 1:22-mj-00180-RMM

Nancy Barron – Arrested

C) RECENTLY IDENTIFIED SINCE JULY

1. Insider275 – Identified
2. Pastor Bill Dunfee – Identified/extensive references to FBI Contacts
3. BullHornEagle – Identified
4. Clayton Norris – Identified
5. JamesDeanWannabe – Identified
6. Insider485 – Identified
7. MagaLongPinkie – Identified
8. Samuel Di Gangi – Identified
9. Jeff Cline – Identified
10. Insider858 – Identified
11. Gavin Crawl – Identified;
12. BlondeSprayer – Identified

D) MISSING INFORMATION

Ashli Babbitt – Dead / Phone not returned to family

SmokeyInsider Kaleb Dillard – Arrested - 2:22-mj-00341-NAD

OVERALL SUMMARY OF “SUSPICIOUS ACTOR” LIKELY WITNESSES

Green highlight shows changes made since July to individuals first reference in 225-3 with those referenced as “identified” being officially identified or referenced by Sedition Hunters as being “identified.” We have almost no proper Brady discovery regarding the individuals below.

1. LemonZest – No ID
2. LemonyKicket – No ID
3. Loehrke – Arrested/**Unindicted**, pre trial release; conduct not accurately depicted in charging documents
4. GooseInGrey – No ID
5. RedYuppyPhotog – Unknown
6. Lawrence Ligas – Arrested; charged with misdemeanors; conduct not accurately depicted in charging documents
7. Insider1340 – No ID
8. Insider486 – No ID
9. Preying Snake and Associates – No ID
10. Timothy Allen Hart – Arrested/Indicted; conduct not accurately depicted in charging documents
11. ProudDoorSmasher – No ID
- 12. Insider275 – Identified**
13. FlagMan – No ID
- 14. Pastor Bill Dunfee – Identified/extensive references to FBI Contacts**
- 15. BullHornEagle – Identified**
- 16. Clayton Norris – Identified**
- 17. Edward McAlanis – Plea Deal; charged with misdemeanors; conduct not accurately depicted in charging documents**
18. GadsdenPouch – No ID
- 19. JamesDeanWannabe – Identified**
20. GrandpaEarPlugs – No ID
21. James Haffner – Arrested/**Unindicted**; pre-trial release
- 22. Insider485 – Identified**
23. Insider2316 – No ID
24. Megan Paradise – **Identified/FBI Contact**
- 25. MagaLongPinkie – Identified**
26. FlightDeckControlChief – No ID
27. GardenGloves – No ID/**Pastor Bill Association**
28. Motorcycle – No ID
29. Insider1022 – No ID
- 30. Insider809 – Identified; charged with misdemeanors**
- 31. TealScrambler Daniel Leyden – Arrested - 1:22-mj-00180-RMM**
32. Ray Epps – Identified
- 33. Baked Alaska – Plea Deal; pretrial release; sentenced**

- 34. John Sullivan – Indicted; pre trial release
- 35. Hunter Ehmke – Plea Deal; pre-trial release; charged with misdemeanors
- 36. PencilBeardInsider – No ID
- 37. SmokeyInsider Kaleb Dillard – Arrested - 2:22-mj-00341-NAD
- 38. George Tenney – Plea Deal
- 39. Ashli Babbitt – Dead / Phone not returned to family
- 40. Zachary Alam - Indicted
- 41. GasMaskTwins – Identified
- 42. SandstoneHoodie – No ID
- 43. Samuel Di Gangi – Identified
- 44. Jeff Cline – Identified
- 45. BigOrangeBrawler – No ID
- 46. Frizz – No ID
- 47. Nancy Barron – Arrested
- 48. MagaHatShieldSharpie – No ID
- 49. GreyHatProfile – No ID
- 50. LookoutGrey – No ID
- 51. GreyPuma – No ID
- 52. CamCrusher – No ID
- 53. CrazyGlasses – No ID
- 54. KennyRogersEarPiece – No ID
- 55. CapitolQuisling – No ID
- 56. DementedWhiteScarf – No ID
- 57. Ricky Willden – Plea Deal (Assault)
- 58. Insider858 – Identified
- 59. TraderVick – No ID
- 60. Gavin Cowl – Identified;
- 61. FlagHatTwins – No ID
- 62. Audrey Southard – Indicted; pre-trial release
- 63. LetsGoEarpiece45 – No ID
- 64. Leonard Ridge IV – Plea Deal
- 65. RedBeefJerky – No ID
- 66. Jeremy Baouche – Plea Deal (8/25/22 – No details yet)
- 67. BadMexicanPoncho – No ID (Likely from Canton, OH area)
- 68. ElmerFuddGlasses – No ID
- 69. BlondeSprayer – Identified
- 70. SignBearer – No ID
- 71. Insider716 – No ID
- 72. MolonSmash – No ID
- 73. RedOnRedGlasses – No ID
- 74. Individual4 – No ID
- 75. VanGray / MaceStash – No ID
- 76. BurleyTheFirst – No ID

- 77. BigRed – No ID
- 78. BlueHat – No ID
- 79. HandsUp – No ID
- 80. WhitePuffyCoatFilmer – No ID