Attachment Three





Retired Systems Engineer

QUALIFICATIONS

- Response force expert/Real world experience
- 6 years of experience as Vulnerability Analyst for DOE (SNL-OST and GTRI)
- Completed 6 years of extensive domestic and international travel for DOE/NNSA
- 6 years of Sandia National Laboratories management experience.
- 8 years of law enforcement management experience.
- Military veteran with 6 years in United States Air Force/military police.
- 25 years of local law enforcement experience (retired).
- 10 years of experience with DOE Safeguards and Security Programs including operations, training, administration, inspections and weapons testing.
- 3 years of experience with U.S State Department Anti-Terrorism Assistance Program (ATAP) teaching foreign nationals in the areas of security, tactical operations and officer safety.
- Extensive tactical knowledge and experience in law enforcement, DoD and DOE operations and training.
- DOE certified Master Level training instructor with extensive experience in SWAT, Live Fire Shoot house, Precision Rifle, Advanced Weapon Systems, Tactical Entry (Breaching) etc.
- Extensive experience developing, documenting and implementing response force doctrine, training, plans, and equipment upgrades including DOE SIRPs and SSSPs; protective force training plans, curriculum, and analyses, limited scope performance tests, tabletop exercises, and force-on-force exercises.
- Experience with J-CATs, Dante, Simajin and other modeling and simulation software.
- Extensive experience with small arms weaponry and ballistic testing methodologies and process.
- Strong analytical and problem-solving skills including root cause analysis and investigation techniques.
- High functioning team member with skill to lead and supervise teams.
- Self directed performer and learner.
- Skill to communicate with subordinates, teammates and superiors effectively both orally and in writing.
- Skill to analyze and make decisions under extreme duress, compressed time frames, and hi-risk conditions.
- Q-Clearance with HRP. Extensive experience working with classified programs and documents
- Proficient in Microsoft Office Suite and familiar with Visio 2013

EXPERIENCE

Sandia National Laboratory

Security Training and Risk Analysis Team; Systems Engineer

- Remote Weapons System Engineer
- Collection of data through sampling, exercise and evaluation to complete vulnerability analysis for the Office of Secure Transportation and Y-12
- Developed test plans and completed ballistic testing projects for SNL, DoD and the US State Department customers
- As a member of the DOE Technology Gap team, have completed technology evaluations at DOE sites to identify the detection, delay and response of the future
- Requested to conduct training courses around the world for the Global Threat Reduction Initiative. Conducting VA training courses by facilitating table top exercises, critical incident management, target folders, etc. Created course curriculum being used by other teams within the DOE complex
- Requested to conduct response force live fire demonstrations for many International Training Courses sponsored by SNL
- Conducted numerous live fire weapons demonstrations and

2009-Present

ballistic component testing for various SNL organization

- Confident public speaker
- Authored numerous white papers and classified papers related to response and response technologies
- Strong customer service focus

Protective Force Training & Operations; Lieutenant

2003 - 2009

- As part of the Training Team, supervise Security Police Officers (SPOII/SPOIII) during live-fire operations, field team training, and classroom events.
- Subject-matter expert in security, law enforcement, use of force, firearms, and tactical training.
- Extensive tactical experience and training background in both law enforcement, DoD and DOE operations.
- Design, develop and implement performance based training for multiple programs including training hazard analysis; instructing multiple topical areas; assisting in the development of the annual training plan; writing and revising course materials including lesson plans, student guides, job aids, presentation materials, etc.
- Verify training products/programs are in compliance with DOE Orders, corporate policies and procedures, applicable laws, codes, regulations, notices, standards, implementing requirements, and SNL contracts.
- Exceptional analytical skills in quantifying and modeling various weapon systems and tactics in combat simulation software, limited scope performance tests, tabletops, and/or force on force exercises
- Coordinate course implementation including safety, facilities, administrative support, and training resources.
- Assist in the development of PF orders, procedures, and policy for both training and operations.
- Develop strong relationships with both internal and external customers for project completion.
- Experience with the development and documentation of response force doctrine, training plans, and equipment upgrades for a wide variety of customers.
- Oversee and verify safety operations for all training activities.
- Design training activities to include standardized evaluations and performance measures, Limited Scope Performance Testing (LSPT's) for student and instructor achievement.
- Evaluate students and instructors during course implementation.
- Test and evaluate firearms tactical systems. small arms weaponry and ballistic testing
- Participated in the development of a long distance taser with the Sandia Advanced Concepts Group. Currently under application for a patent.
- Assist in developing and implementing corrective action plans for identified deficiencies.
- Assist other Department of Energy sites and organizations with training, testing, evaluations and operations, including the NTC, Tonopah Test Range, Office of Safeguards and Transportation, Los Alamos National Laboratories and SNL International Programs.
- Assist Department 4232, S&S Training, Awareness and Documentation in developing media-based training programs including the PF Overview, PF Lock and Key DVD, Security Incident Report Writing, Friend or Foe, and Ballistic Wall training.
- Maintained a Class B Commercial Drivers License.

Department of Energy National Training Center (NTC)

2000 - 2003

Wackenhut Service, Inc.; Adjunct Instructor

- Supervised and trained foreign dignitaries and students through the United States State Department Anti-terrorism Assistance Program. Worked with individuals from diverse backgrounds and cultures including Jordan, Kazakhstan, Djibouti, Yemen, Georgia, Ecuador, and the Philippines. Training activities including, but not limited to, ethics, defensive tactics, hostage rescue, tactical response, less lethal, officer survival, firearms (pistol, rifle, sniper rifle,) ambush and counter ambush techniques, improvised explosive device identification and response, setting up road blocks, traffic stops, and site security operations.
- Extensive background working with translators.
- Supervised and trained DOE and other federal, state, and local law enforcement students in basic and advanced security courses.

Albuquerque Police Department (Retired)

1985 - 2003

Field Services; Sergeant/Supervisor (1995-2003)

- Full time supervisor of the Special Weapons and Tactics team during both hi-risk events (participated in over 500 SWAT activations), riot control, civil disturbances and daily field services operations.
- Extensive team tactical experience and training in both law enforcement, DoD and DOE operations
- Conducted day-to-day management and administration of field operations including payroll, counseling and disciplinary personnel actions, purchasing, strategic planning, training assessments, conducted both internal and external conflict resolution, and personnel supervision.
- Project supervisor of the APD tactical range facility rebuild including a live-fire shoot-house and long-distance ranges.
- Court certified expert witness in narcotics related cases.
- Represented APD as a liaison through Community Based Policing initiatives and special events including Balloon Fiesta, State Fair, Presidential and dignitary protection activities.
- Responsible for the planning, assignment and supervision of assigned personnel conducting routine patrol, calls for service, officer initiated calls, traffic enforcement and investigation, public relations and community service.
- Analyzed laws, methods, and technological advancements in crime detection and law enforcement to include weapons, explosives, personal protection equipment, ammunition, vehicles, etc.
- APD Reserve Police Officer (2003-2009)

Field Services; Patrolman and Detective (1986-1995)

- Special Investigations/Repeat Offender Project (ROP) conducting long and short-term investigations of repeat criminal offenders, violent, property and white-collar crimes.
- Technical equipment specialist trained in installing electronic monitoring equipment (audio/video) and electronic tracking systems.
- District and Federal court certified expert witness.
- Participated in over 1000 felony arrests and over 300 search and arrest warrants.
- Performed general field services duties including routine patrol, calls for service, officer initiated calls, traffic
 enforcement and investigation, public relations and community service.

United States Air Force 1979 - 1985

Security Police; Law Enforcement Specialist/Staff Sergeant/E-5

- Responsibilities included, routine patrol, calls for service, traffic accident investigation and first-line supervision of personnel.
- Maintained a Secret security clearance and was authorized through the Personnel Reliability Program to provide security for nuclear weapons and components.
- Honorably discharged with numerous medals and commendations.

JOB SPECIFIC EDUCATION & TRAINING

Department of Energy	Lockheed Martin/SNL
 DOE certified Master Level Training Instructor 	TVI Community College Supervisor Academy (96
 Firearms and Advanced Weapons Instructor 	Hours)
 SPO II and SPO III instructor 	Orientation to Management (OM141)
 Live Fire Shoot House Instructor 	Extraordinary Leader (MGT360)
 Precision Rifle Instructor 	Effective Manager (OM181)
 Intermediate Force Instructor 	Management Essentials (OM206)
Radiation Worker I	Current on all corporate training requirements
■ DOE Armorer	
(Numerous other instructor and student courses)	
Completed DOE/NTC Professional Education Program	
Albuquerque Police Department	International Association of Chiefs of Police
 Critical Incident Management 	 Swat Supervisors Tactics and Management
 Internal Affairs Investigation/Problem Oriented Policing 	 Advanced Tactical Management for Commanders and
Police-Press Relations	Supervisors
Federal Emergency Management Agency	Texas A&M Law Enforcement Training Division
 DHS/FEMA training instructor 	■ Threat Assessment
Introduction to the Incident Command System (ICS)	
 Basic ICS for Federal Disaster Workers 	
National Incident Management System Introduction	
University of Phoenix – (6 Credit hrs)	Troy State University – (3 Credit hrs)
Community College of the Air Force – (16 Credit hrs)	South Plains Association of Government – (3 Credit hrs)

Extensive law enforcement, emergency response and instructional systems design training courses. List available upon request.

OTHER JOB SPECIFIC KNOWLEDGE & SKILLS

- Knowledge of DOE orders, federal and state law, SNL management policy and procedure including human resource law, collective bargaining, affirmative action, equal opportunity employment, sexual harassment, labor laws and practices.
- Knowledge of discipline and counseling techniques and performance appraisal techniques.
- Knowledge of quality assurance processes and techniques.
- Knowledge of records management techniques.
- Knowledge of customer service theory and practices.
- Skill to negotiate, clarify and document staff expectations and measureable standards.
- Skill to manage, motivate, counsel, and provide feedback to a diverse workforce through SNL sanctioned techniques and methods.
- Skill to lead during security and emergency management events.
- Skill to operate MS Office Suite.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

THE UNITED STATES OF AMERICA

\$ \$ \$ \$ \$ VS.

CAUSE NO.: 1:22-CR-15

ELMER STEWART RHODES, III

NOTICE OF DEFENSE EXPERT

COMES NOW BRADFORD L. GEYER, Counsel for Kenneth Harrelson, and inform the United States Attorney's Office, more specifically Jeffrey Nestler and Kathryn Rakoczy, and the Court that the defense can now explain in greater detail its intention to designate Steve Hill as the defense team's expert on Response Force (to Security Incidents) Expert, who has spent the bulk of his career assessing and modeling threat scenarios for high value facility targets and evaluating responses, See CV previously provided. While developing final opinions, we plan to have the expert initially available as an inside technical expert to assist us in reviewing Government's discovery productions and requesting supplemental productions and to conduct inspections of key security features like the Columbus door and monitoring systems and Mr. Hill will be joining us on Saturday during the tour of the Capitol and has been reviewing discovery that includes surveillance video and other discovery including radio transcripts and recordings. We intend to call Hill as a testifying expert after he receives and reviews necessary discovery and finalizes an opinion.

¹ Mr. Hill's final CV may include updated information regarding clearances and relevant experience that may or may not require a closed hearing.

Here is a general breakdown of what Hill may testify to, as a Response Force (to Security Incidents) Expert. The scope will narrow so as to ensure we make efficient use of court time:

Assessment of Police Tactics, Techniques, and Procedures

Assessment of USCP (officers and civilian decision makers) command, control, training and decision making based on open source and discovery information, and how this information affected security measures carried out on January 6.

Discussion of typical planning steps violent extremist militia planners would use to create and carry out a multi-person attack (this is called "red teaming" and is used for Tabletop exercises and force-on-force exercises). He would compare these steps, which are military/police standards, to what we know about what the Oath Keepers did in advance to and during January 6.

How the results of the assessments in #1 and #2 provide insight into whether the Oath Keepers actually impeded an official proceeding considering that restarting the Vote Certification had to wait until the police, to include Capitol Police and also other law enforcement agencies, completed certain actions inside the Capitol that had to be performed first.

Compare and contrast actions and reactions of Oath Keepers, rally attendees, provocateurs and responders based on a host of security issues that will be identified, explained and framed in a context that will assist the prosecution and defense to understand what is otherwise is a confusing series of actions and reactions.

It is possible the above will change as Mr. Hill conducts his review of information that has been protected by court order and as we receive additional outstanding discovery.

Dated: August 25, 2022 RESPECTFULLY SUBMITTED

/s/ Brad Geyer
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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2022, a true and accurate copy of the forgoing was electronically filed and served through the ECF system of the U.S. District Court for the District of Columbia.

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