



**SANTILLI**

42. Law enforcement became aware SANTILLI has been in Harney County, Oregon, since January 2, 2016, but the exact date of his arrival in the area is unknown. SANTILLI operates a channel on YouTube called "Pete Santilli Show." Details of the channel indicate it is categorized as entertainment under a standard license for YouTube. SANTILLI has posted video to the channel concerning the Hammond family and has been calling for people to come to Oregon since at least December 27, 2015. SANTILLI often streams live video from his YouTube channel. All video referred to in this affidavit has been preserved by law enforcement agents. In the referenced videos, SANTILLI often wears a vest which says "PRESS" with his name below it. SANTILLI has identified himself as a member of the Oath Keepers and wears insignia which indicates his affiliation with the III% group, detailed below. According to open source information, the Oath Keepers and III%ers have been identified as organizations associated with the anti-government patriot movement.

43. On December 27, 2015, a video was posted on SANTILLI's YouTube channel "Pete Santilli Show" titled "Operation Hammond Ranch – Patriot ALL-CALL Deployment to

Oregon." In the video, SANTILLI mentions known armed occupiers RITZHEIMER and O'SHAUGHNESSY and states they have "put out an all call for all patriots to respond. It was a call to action, all patriots to respond no later than January 2 to Oregon." SANTILLI also states:

There's going to be a lot of updates coming, ok. Ah, a lot of stuff that's going to be happening out there, I can't go into the exact details, because a, I don't have all the details. I ah, I, let's call it, um, I'm not a, I need to be on a need to know basis. I'm going to be, as a member of the media, ah, exercising my First Amendment rights to cover this stuff for the American public cause the main stream media is not going to be bringing you what we are going to be bring to, bringing you as to what's happening, ah, at Hammond Ranch. So, ah, we are calling it initially here Operation Hammond Ranch. That may change, ah, but we want to bring awareness to Hammond Ranch.

SANTILLI continued in the video by stating:

What it's about, it's in Oregon, ah, and we need you to get out there, ah, this is an all call, ah, it's been green lighted, for all patriots to respond to Oregon on or before January 2, ah there's going to be a patriot convoy on January 2. You'll be getting those exact details. So I'm Pete Santilli. Be sure to like, comment, subscribe, and share the heck outta this thing. Get the word out, ah, to all patriots that can get out there, especially in the Pacific Northwest. Ah, you must get out there, ah what is happening here . . . .

SANTILLI continues:

Ok, ah, we got the Federal government running around as if they're trying to protect us from terrorism. No, they're trying to shut down patriots like me, Schuyler Barbeau, throw them in jail, throw the Hammonds in jail, call them terrorists, and, ah, let all the Syrian refugees come in. We're not going to let it happen. We're going to take a stand . . . . Ok, I'm sure they had original intentions to be extremely peaceful. Ah, of course, ah, we, ah, we must get the Federal government to comply with our peaceful demands, ah, otherwise we have to explore all opportunities that we have made available to us through our founding fathers. So, ah, um, be prepared, be alert, um, and definitely respond to this call of action, call to action folks, all call, all patriots get out there. Thank you. Alright, here we are.

44. On January 2, 2016, a video was posted on YouTube channel "Pete Santilli Show" titled "[Live feed 2] Operation Hammond Ranch." The video appeared to be filmed in the parking lot of the Safeway grocery store in Burns, Oregon, prior to a scheduled protest at

noon the same day. In the video, SANTILLI states, "Hey ladies and gentlemen, I just want you guys to know, I want it stated for the record here on the Pete Santilli Show." SANTILLI then turns and faces the camera directly and states: "Hey Stewart Rhodes, I tore up my membership card. I'm still an Oath Keeper, homey, huh, how does that work? I don't need your card. I don't need to pay your membership dues." SANTILLI then turns away from camera and addresses others and says: "I tore up my card. I tore up my card. I tore up my card. I'm still an Oath Keeper. See how that works?" SANTILLI then turns back to camera and says: "You know what, sue me. I got nothing. I got a freaking, I got an ash tray and a freaking pocket a hole. That's it. Sue me. Sue me. I'm an Oath Keeper. Can you imagine that? I tore up my card. I didn't blow up. It's amazing."

45. On January 2, 2016, a video was posted to YouTube channel "Pete Santilli Show" titled "Live feed Hammond ranch." The following conversation was heard on video but took place off-camera:

Ammon BUNDY: Hey we're continuing the stand. We're continuing the stand [at/out] the MNWR.

SANTILLI: Ok.

Ammon BUNDY: Let everybody know that.

SANTILLI: Ok.

Ammon BUNDY: They're to go to the MNWR . . . [inaudible] . . . after the rally . . . MNWR right after.

SANTILLI: [Coming back on microphone]: Ok, here we go . . . . [Returns to protest].

Also captured in the same video, an unidentified male greets A. BUNDY, and states he was with A. BUNDY in Nevada. The following conversation was then captured on video:

/ / /

Ammon BUNDY: We're continue the stand . . . [becomes inaudible as SANTILLI's cameraman moves away, and bumps into someone].

Cameraman: I was trying to get away from that conversation.

Below is a still frame shot from the above conversation as A. BUNDY speaks to the unidentified man.



46. Later, on the same video, the camera pans back as A. BUNDY leans in to SANTILLI and says, "Malheur, Malheur." The below still shot captures the moment A. BUNDY is talking to SANTILLI (SANTILLI is facing away from camera with mesh vest and black baseball cap). SANTILLI appears to acknowledge A. BUNDY and then pulls A. BUNDY in for a public speech on SANTILLI's live stream.



47. On January 5, 2016, a video was posted on YouTube channel “Pete Santilli Show” titled “Live update Burns Oregon #aslongasittakes.” In the video, SANTILLI states: “We want a constitutional sheriff, constitutional peace officers, but here is what we need, most importantly, ok, this is what we need, now I’m gonna say this and I am going to be talking about it throughout the day: one hundred thousand, unarmed, men and women, to stand together. It is the most powerful weapon in our arsenal, those guns that we were talking about, those that were carrying guns . . . .” SANTILLI then talks to a gas station attendant and repeats the same call for one hundred thousand people.

48. Also on January 5, 2016, a video entitled “#aslongasittakes” was live-streamed for several hours. The video started on January 5, 2016, continued into January 6, 2016, and was posted on YouTube channel “Pete Santilli Show.” The video is filmed at or just outside the MNWR. The location of the video outside the MNWR was confirmed by a Federal Wildlife Officer of the U.S. Fish and Wildlife Service. During the video, SANTILLI stated, “We’re not fucking going nowhere.” SANTILLI later stated, “Here is what we need. I’m gonna tell you something right now. Captain Joe, myself, I’m not armed. I am armed with my mouth. I’m armed with my live stream. I’m armed with a coalition of like-minded individuals who sit at home and on YouTube and watch this.”

49. On January 6, 2016, a video was posted on YouTube channel “Pete Santilli Show” titled “press conference.” In the video, SANTILLI states, “We need to join together, one hundred thousand, unarmed men and women, one hundred thousand of them, whether they be from the outside, or they be from here in this local county.”

/ / /

/ / /

50. On January 7, 2016, a video was posted on YouTube channel "Pete Santilli Show" titled "Live From Burns, Oregon - #aslongasittakesoregon." In the video, SANTILLI states:

I want one hundred thousand people out here, shoulder to shoulder, uh, unarmed. That's what I am calling for. Out here, between, and and to learn, ok, and to also protect the good souls that are inside, uh, if the Sheriff's department is telling you not to come out here, ok, uh, that means that they are trying to keep you away from the truth. . . . Ok, this learning experience that is going to take place here in the coming days, you guys are going to be blown away as this thing starts to unravel, uh, but you need to come out here, ok, you need to come out and not cower in fear . . . .

51. On January 11, 2016, a video was posted on YouTube channel "Pete Santilli Show" titled "Burns, Oregon – Community Meeting @ Burns High School." In the video, SANTILLI can be seen wearing III% on the sleeve of his shirt, shown below.



52. On January 12, 2016, a video was posted to YouTube channel "Pete Santilli Show" titled "1/12/16 Day 11 – Update [1] from Malheur Wildlife Refuge in Burns, Oregon - #OregonFront." In the video, SANTILLI states:

///

///

I give you my word from this point forward, I will be lawful, I will be constitutional, ok, but I want to stand with you shoulder to shoulder, in opposition to what is happening here in Burns, and I want to crush communism here in Burns, and I want to crush socialism here in Burns, and I want to call upon everyone, if we can get one hundred thousand people standing shoulder to shoulder with me with flowers and determination, to take a stand against what's happening here in Burns. I want you to join me at this meeting. Please join me at this next meeting. Please. I'm going to go . . .

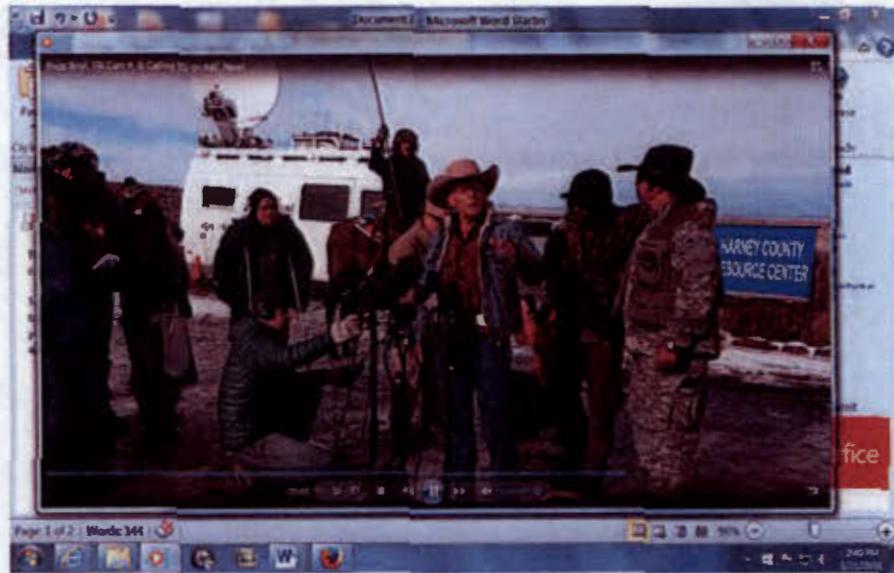
53. On January 17, 2016, a video was posted to an Internet video sharing website by user "Veritas 13 Fox" titled "Press Brief, FBI Cam#, & Calling BS on ABC News." In the video **SANTILLI** can be seen standing behind Finicum, with **RITZHEIMER** and another occupier, at the main entrance to the MNWR. The vest **SANTILLI** is wearing has a clearly visible Oath Keeper patch on front. The vest also reads "PRESS" on the back. The video depicts that just prior to the press conference, **SANTILLI** whispered something in Finicum's ear and patted him on the back. After Finicum stated that the property does not go back to the BLM and then stated, "It does not return to the federal government," **SANTILLI** put his arm around the individual standing next to him. After Finicum spoke, **SANTILLI** addressed the media and said:

LaVoy's ah, offered me the opportunity to come up and speak to the members of the press. Uh, my name is Pete Santilli, uh for those of you that don't know me, uh I've accumulated approximately fifteen million uh minutes of viewing time, on the stream total combined uh worldwide, and I want to uh let the main stream media know uh that those that are not watching the stream or haven't been tuned in to my show, shame on each and every one of you. For those people that have been following the main stream media . . . [inaudible] . . . still asking the question. After twelve, thirteen days of being out here people are still wondering what the core issues are here, on this land. Shame on each and every one of you, millions of dollars being spent, you have an obligation to communicate to the public, and unfortunately your filtering [inaudible] . . . the public is not well informed.

A screen shot of the video is shown below:

///

///



54. On January 21, 2016, a video was posted to YouTube channel "Pete Santilli Show" titled "BREAKING: Ammon Bundy Meets & Negotiates With FBI [EXCLUSIVE]." In the video, A. BUNDY can be seen and heard speaking with FBI personnel over a speaker on a cell phone. CAVALIER is standing beside A. BUNDY. SANTILLI introduced himself to several people as he filmed what was going on. Approximately thirteen minutes after leaving the meeting and while driving away, SANTILLI had the following conversation with a second person in his vehicle, who is off-screen, operating the video camera:

Camera person: They're amping up their uh little camp there. You know they are building, they have built a uh very large triage in the hospital. We have, we've confirmed that, we have, and we've also noticed in the last week that they're starting to uh get closer and closer to the refuge.

SANTILLI: Can I say something? Can I add something?

Camera person: Well of course.

SANTILLI: This is what I wanna tell, and good patriots will do good things, that's what I'm calling for. All you good patriots out there, it's time to staff up. Ok.

Camera person: Staff up? Yes.

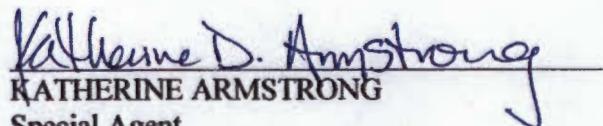
SANTILLI: I'm gonna say this right now, loud and clear, and I want to put it out to every one of you patriots out there right now. This is to provoke constitutionality, ok, only! That's it. So don't say 'oh my goodness lo lo lo, shut your cake hole!' If you're a patriot, ok, and you believe in what we're doing here as to ah protecting our god given rights, ok, you need to get in your car and come out here ok. Good patriots will do good things. Now's the time, time to staff up, ok. Time to staff up. I, I saw a compound that is so [video skips] . . . alright, that's what I'm calling for, that's what I'm provoking here, alright! Uh, we have a Second Amendment right uh to do that, to keep and bear arms. So those patriots that do keep and bear arms lawfully and constitutionally, it's time to staff up now! Right now.

55. In addition to social media posts made by individuals noted above, multiple news reports, interviews, and videos have reported or shown the occupiers of the MNWR to be armed with pistols and long guns.

56. On January 26, 2016, A. BUNDY, O'SHAUGHNESSY, PAYNE, R. BUNDY, CAVALIER, COX, and SANTILLI were taken into custody.

#### Conclusion

57. This affidavit and the requested arrest warrants were all reviewed by two Assistant United States Attorneys (AUSAs) prior to being submitted to the Court. The AUSAs informed me that in their opinion, the affidavit is legally and factually sufficient to establish probable cause to support the issuance of the requested warrants. I respectfully request the Court to authorize the proposed arrest warrants based on this complaint.

  
KATHERINE ARMSTRONG  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this 26<sup>th</sup> day of January 2016.

  
THE HONORABLE STACIE F. BECKERMAN  
U.S. Magistrate Judge, District of Oregon