



May 26, 2021

The Honorable Jamie Raskin  
Chair  
Homeland Security Subcommittee on Civil Rights and Civil Liberties  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Pete Sessions  
Ranking Member  
Homeland Security Subcommittee on Civil Rights and Civil Liberties  
U.S. House of Representatives  
Washington, DC 20515

Dear Chair Raskin and Ranking Member Sessions:

As part of the Subcommittee on Civil Rights and Civil Liberties May 26 hearing “Confronting Violent White Supremacy (Part V): Examining the Rise of Militia Extremism,” we write to provide the expertise of the Southern Poverty Law Center (SPLC) Action Fund. We would ask that this statement be included as part of the official hearing record.

The SPLC Action Fund is dedicated to fighting for racial justice alongside impacted communities in pursuit of equity and opportunity for all. We work primarily in the Southeast United States where we have offices in Alabama, Georgia, Florida, Louisiana, Mississippi, and Washington, D.C. The SPLC Action Fund promotes policies and laws that will eliminate the structural racism and inequalities that fuel oppression of people of color, immigrants, young people, women, low-income people, and the LGBTQ+ community.

The riot at the capitol on January 6 of this year has illustrated how far extremists will go and how willing they are to undermine democracy and democratic processes with the objective of advancing their own agendas.

This includes groups which engage in paramilitarism, many of whom prescribe to ideologies that fall within the confines of the antigovernment movement. For decades, movement members have formed militias and engaged in paramilitary training, using their expertise to target and terrorize federal, state, and local government officials, agencies, and facilities. These groups have regularly cited what they perceive as government tyranny as their motive – including, but not limited to, what they believe is a public official’s intent to create a one world government.

Militias remain a threat to the U.S. in 2021 due to their paramilitary skills, combined with their continued animus toward the government. A secondary threat comes from so-called “constitutional sheriffs,” which seek to utilize militias to meet their own antigovernment objectives.

Preventing activities by these groups is necessary but bears some complexity because of these organizations’ close relationships with some federal and local lawmakers who have political power and influence. When these relationships are public, they may lend an air of legitimacy to otherwise fringe organizations. And although the ideology of these groups is inherently antigovernment, they recognize the value in securing political representation, at least in the short term, in order to develop power and influence in their own communities and meet the needs and objectives of their organizations.

The Southern Poverty Law Center Action Fund tracked and documented relationships between extremist groups and lawmakers in 2020 as part of its ongoing Exposing Extremism in Elections project, which was shared with the public on the website [www.exposingextremisminelections.org](http://www.exposingextremisminelections.org).<sup>1</sup> The project found ties between a dozen 2020 individuals seeking elected office (including new candidates and incumbents) and U.S. militias and constitutional sheriffs.

This statement seeks to impart information about the threat that militias and constitutional sheriffs pose to the United States, as assessed by the Southern Poverty Law Center. It includes an overview of paramilitary group activity which occurred domestically over the past year, which included violence, public intimidation and political violence, and a threat assessment of the Oath Keepers organization, which continues to play a large militant role in the antigovernment space, and constitutional sheriffs who intend to utilize this particular historical moment to claim control over the enforcement of federal and state laws.

This past year militias and boogaloo adherents, a recently formed, often violent movement which advocates for an uprising against what they perceive as a tyrannical government, openly promoted and emphasized the prospect of an impending second civil war.

Over the course of 2020 and during January 2021, movement members, many of them armed with guns or explosives, conspired to commit insurrection against the United States government (Washington, D.C.),<sup>2</sup> kidnap a sitting governor (Michigan),<sup>3</sup> bomb a federal building (Nevada),<sup>4</sup> murder law enforcement and security personnel (California),<sup>5</sup> and intimidate civilians and government employees in

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<sup>1</sup> Southern Poverty Law Center Action Fund. (2020). *Exposing Extremism in elections*. <https://www.exposingextremisminelections.org/>.

<sup>2</sup>Gais, H and Miller C. (2021, January 22) “Capitol Insurrection Shows How Trends On The Far-Right’s Fringe Have Become Mainstream,” Southern Poverty Law Center.

<https://www.splcenter.org/hatewatch/2021/01/22/capitol-insurrection-shows-how-trends-far-rights-fringe-have-become-mainstream>.

<sup>3</sup> McLaughlin, K. (2020, November 13). “The Wolverine Watchmen plot to kidnap Michigan Gov. Whitmer also included a plan to burn down the state Capitol building, officials say,” *Insider*. <https://www.businessinsider.com/kidnap-plot-gov-whitmer-included-plan-burn-capitol-ag-says-2020-11>.

<sup>4</sup> Barroquere, B. (2020, June 9). “Three Nevada ‘Boogaloo Boys’ Arrested by FBI in Firebombing Plot,” Southern Poverty Law Center. <https://www.splcenter.org/hatewatch/2020/06/09/three-nevada-boogaloo-boys-arrested-fbi-firebombing-plot>.

<sup>5</sup> Gartrell, N. (2020, June 23). “Steven Carrillo, Boogaloo-associated suspect in killing of two CA officers, has first court appearance in federal death penalty case,” *Santa Cruz Sentinel*. <https://www.santacruzsentinel.com/2020/06/23/steven-carrillo-boogaloo-associated-suspect-in-killing-of-two-ca-officers-has-first-court-appearance-in-federal-death-penalty-case/>.

the streets, at their homes and at their places of employment California,<sup>6</sup> Washington, DC,<sup>7</sup> Idaho,<sup>8</sup> Michigan,<sup>9</sup> New Mexico,<sup>10</sup> Nevada,<sup>11</sup> Ohio,<sup>12</sup> Pennsylvania,<sup>13</sup> Virginia,<sup>14</sup> Washington).<sup>15</sup>

Antigovernment militias exploited rallies, such as those advocating for an originalist view of the second amendment and others opposing COVID-19 guidelines, to publicly evangelize about their ideology and recruit members and supporters.

On January 20, 2020 over a dozen militias, operating in multiple states, including individuals who took part in the white power rally in Charlottesville on August 12, 2017, came out in a show of force in Richmond, Virginia during a gun rights rally sponsored by the Virginia Citizens Defense League (VCDL). Despite Governor Ralph Northam calling a state of emergency, militias groups showed up armed and paraded through the streets.

From April through December 2020, amidst the first and second waves of the COVID-19 pandemic, at least thirteen militia groups organized or participated in protests against coronavirus guidelines.

The American Patriot Rally, which was held April 30, 2020 at the capitol in Lansing, Michigan, was arguably the most notable of these events.<sup>16</sup> Between 800 and 1000 individuals attended the protest, according to estimates. At least five militias showed up to the event to provide security, one militia was invited by host Ryan Kelley. Event attendees, many of them armed, chanted “let us in” as they stormed the state house and attempted to enter the closed legislative chamber where lawmakers were discussing a COVID-19 related resolution.

Current and former militia members who attended the April 30 event, including brothers Michael and William Null, were later arrested, and charged on October 7, 2020 for conspiring to kidnap Governor

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<sup>6</sup> (2020, February 6). “Business and property owner asked armed militia members to Oakdale, police chief says,” *The Modesto Bee*. <https://www.modbee.com/news/local/oakdale/article243352451.html>.

<sup>7</sup> Levenson, M. (2020, January 7). “Today’s Rampage at the Capitol, as It Happened,” *The New York Times*. <https://www.nytimes.com/live/2021/01/06/us/washington-dc-protests>.

<sup>8</sup> Boone R. 2021, April 8). “Anti-government activist Bundy arrested at Idaho Statehouse,” *Seattle Times*. <https://www.nytimes.com/live/2021/01/06/us/washington-dc-protests>.

<sup>9</sup> Dodge, S. (2020, December 6). “Armed protesters rally outside Michigan Secretary of State Jocelyn Benson’s home,” *M Live*. <https://www.mlive.com/public-interest/2020/12/armed-protesters-rally-outside-michigan-secretary-of-state-jocelyn-bensons-home.html>.

<sup>10</sup> Colton, H. (2020, June 2). “Armed Militia Group Alarms Protesters Late Monday After Peaceful Rally,” *KUNM*. <https://www.kunm.org/post/armed-militia-group-alarms-blm-protesters-late-monday-after-peaceful-rally>.

<sup>11</sup> Penrose, K. (2020, August 9). “BLM Protest in Douglas County Draws Hundreds of Counter protesters, Militia,” *Sierra Nevada Daily*. <https://www.sierranevadaily.org/2020/08/09/blm-protest-in-douglas-county-draws-hundreds-of-counter-protesters-militia/>.

<sup>12</sup> WKRC (2020, June 14). “Tensions high at Bethel protest, at least one assault,” *Local 12*. <https://local12.com/news/local/fights-break-out-at-protest-in-bethel>.

<sup>13</sup> Lohr, T. (2020, June 6). “As armed citizens watched from rooftops, Elizabethtown protests remained peaceful Saturday,” *Lancaster Online*. [https://lancasteronline.com/news/local/as-armed-citizens-watched-from-rooftops-elizabethtown-protests-remained-peaceful-saturday/article\\_ac32553c-a779-11ea-bac3-67abdeab7ef1.html](https://lancasteronline.com/news/local/as-armed-citizens-watched-from-rooftops-elizabethtown-protests-remained-peaceful-saturday/article_ac32553c-a779-11ea-bac3-67abdeab7ef1.html).

<sup>14</sup> Allam, H. (2020, July 6). “An uneasy July 4<sup>th</sup> in Richmond, Va., As Armed Groups Gather Warily,” *National Public Radio KNPR*. <https://www.npr.org/2020/07/06/887467436/-were-willing-to-do-what-it-takes-causes-collide-in-richmond-s-streets>.

<sup>15</sup> Shedlock, J. (2020, July 1). “Protesters gather in front of Vancouver city attorneys’ homes,” *The Columbian*. <https://www.columbian.com/news/2020/jul/01/protesters-gather-in-front-of-vancouver-city-attorneys-homes/>.

<sup>16</sup> Mauger, C. (2020, April 30). “Protesters, some armed, enter Michigan Capitol in rally against COVID-19 limits,” *The Detroit News*. <https://www.detroitnews.com/story/news/local/michigan/2020/04/30/protesters-gathering-outside-capitol-amid-covid-19-restrictions/3054911001/>

Gretchen Whitmer of Michigan. According to a brief filed by the Michigan Attorney General's Office, these individuals also contemplated burning the statehouse or forcing their way in and taking hostages.<sup>17</sup>

After the deaths of George Floyd and Brianna Taylor, over 20 different militia groups participated in countermeasures to protests organized by the Movement for Black Lives. These militia groups, many of them dressed in tactical gear and openly carrying assault-style weapons, stood inside or in close proximity to protests. Some were seen patrolling rooftops or near businesses, claiming to be providing security against “rioters” and “looters.” In reality, these actions often had the effect of intimidating protestors and pedestrians.

In Troy, New York on June 7, 2020, a group of eight men in bullet-proof vests and body armor, some carrying loaded weapons loitered at the site of the Troy Rally for Black Lives. After a search of their vehicles, law enforcement found thousands of rounds of ammunition, a gas mask and a tactical manual for the New England Minutemen. One member was arrested for possessing a ghost gun, an untraceable firearm that is often assembled at home.<sup>18</sup>

On the same day, members of the California State Militia stood armed on a rooftop of a business in Oakdale, California on a day when a Black Lives Matter protest was rumored to occur.<sup>19</sup> The Oakdale Police Department later issued the following statement: “We have received multiple inquiries and heard from many concerned residents about a group of people dressed in camouflage or ‘militia’ at a downtown business during yesterday’s demonstration. We want to set the record straight. The group wearing military attire were not members of the U.S. National Guard and they had no affiliation with the Oakdale Police Department or any of our partner agencies.”

In New Mexico, the New Mexico Civil Guard militia (NMCG) stood armed in military-style gear near multiple Black Lives Matter protests in 2020 and involved themselves in a conflict between protestors and counter protestors at the site of the Oñate monument that protestors wanted removed.

According to the state of New Mexico, which initiated a lawsuit against the NMCG: “Numerous members of the NMCG attended the protest as a private vigilante or paramilitary unit wearing matching camouflage attire and sporting assault rifles and other military-style gear. Their professed purpose was to ‘protect’ the Oñate statue from defacement. In the tense atmosphere exacerbated by NMCG’s heavily armed presence an individual who apparently is not affiliated with the paramilitary group battered several female protesters before he ultimately shot and injured another protester.”<sup>20</sup>

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<sup>17</sup> McLaughlin, K. (2020, November 13). “The Wolverine Watchmen plot to kidnap Michigan Gov. Whitmer also included a plan to burn down the state Capitol building, officials say,” *Insider*. <https://www.businessinsider.com/kidnap-plot-gov-whitmer-included-plan-burn-capitol-ag-says-2020-11>

<sup>18</sup> Crowe, K., II (2020, June 16). “DA: Militia manual found after Troy police confronted armed men near Black Lives Matter rally,” *Times Union*. <https://www.timesunion.com/news/article/Militia-manual-found-after-police-confronted-armed-15343711.php>

<sup>19</sup> Farrow, D. (2020, June 7). “Business and property owner asked armed militia members to Oakdale, police chief says,” *The Modesto Bee*. <https://www.modbee.com/news/local/oakdale/article243352451.html>

<sup>20</sup> *State of New Mexico v. New Mexico Civil Guard, etc. County of Bernalillo* Second Judicial District Court, D-202-CV-2020-04051, VERIFIED COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF, page 3.

The state has declared the NMCG “unlawfully exercised and intends to continue to unlawfully exercise the power to maintain public peace reserved to peace officers.”

### **The 2020 Elections**

The 2020 election animated numerous paramilitary groups, which presented themselves at a variety of election related events.

On September 9, 2020, the Georgia III% Martyrs militia provided security for then-candidate Marjorie Taylor Greene, running for Georgia’s 14<sup>th</sup> congressional district and then-Georgia U.S. Senator Kelly Loeffler.<sup>21</sup> The rally took place in Ringgold, Georgia. Georgia III% Martyrs previously discussed their group name on social media, on April 6, 2020 claiming, “We picked that name because we are willing to die for our beliefs and cause. Not everyone is prepared for that.”

Multiple militia groups attended post-election protests where organizers and participants often parroted President Trump’s claims that the election was stolen. At least one of these protests occurred outside vote counting facilities.

Here is an SPLC-compiled sampling of paramilitary groups that attended election-related protests:

- Members of the Michigan Liberty Militia appeared at an armed rally at the TCF Center in Detroit on November 6, 2020 during ballot counting proceedings. According to a news article, group leader Phil Robinson attended the rally “to fight what he called tyranny and fraud.”<sup>22</sup>
- On November 7, 2020, John Tiegen, the head of the United American Defense Force Militia, which is organized under the organization Faith Education Commerce, spoke to the crowd at a Stop the Steal rally in Colorado Springs, Colorado where his group members were also present.
- In Georgia, on November 7, members of the III% Security Force, which is headquartered in the state, were observed at a Stop the Steal rally at the capitol. The same month the group’s leader, Chris Hill, posted a video about the election to social media, where he fired a weapon while claiming “These next 45 days are going to be packed with violence.”<sup>23</sup> Georgia III% Martyrs came to the Georgia Capitol to protest the following day.

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<sup>21</sup> Batchelor, T. (2020 September 21) “Armed Trump Supporters Surround Trump-Backed QAnon Candidate at Second Amendment Rally,” *Newsweek*.

<https://www.newsweek.com/armed-supporters-trump-backed-qanon-marjorie-greene-second-amendment-rally-1533230>

<sup>22</sup> Abdel-Baqi, O, Terranella, Sand Witsil, F. “Protesters rally at TCF Center as Biden’s lead overtakes Trump in key states,” *Detroit Free Press*.

<sup>23</sup> Joyner, C. (2020, October 22) “Georgia at high risk of militia threat around elections, new report says,” *Atlanta Journal Constitution*. <https://www.ajc.com/news/georgia-at-high-risk-of-militia-threat-around-elections-new-report-says/5ZWUJWXY35DMXHCCEN735CSPFY/>.

- The Oath Keepers militia were seen at the Million MAGA March at the United States Capitol on January 14, 2020, along with members of the boogaloo movement, conspiracy theorists, and white nationalists.
- A similar protest occurred in Atlanta, Georgia on November 21, 2020. III% Security Force attended, and Oath Keepers acted as armed security.

The slate of 2020 protests, along with the post-election rallies, ultimately culminated in the political violence that captured world-wide attention on January 6, 2021 at the Capitol in Washington, DC. Extremists, including militias, boogaloo members, border vigilantes, conspiracy theorists, and white nationalists, converged in an effort to interfere with the certification of the 2020 presidential election. Members of law enforcement and the Capitol Police were assaulted and killed, while insurrectionists cheered their successful penetration of the building and its hallowed halls.

### **Oath Keepers Militia**

On January 6, the Oath Keepers, a nationwide antigovernment militia, which has contributed to multiple standoffs against the government, was onsite at the Capitol to attempt to stop the certification of electoral college votes. Multiple members of the group arrived at the Capitol with the aim of fomenting chaos and violence. Over a dozen members have been arrested and charged for their participation in the insurrection.<sup>24</sup>

The Oath Keepers organization targets their recruiting efforts to members of the armed forces, law enforcement officials, and first responders; a class of individuals who possess a diverse set of tactical skills that the group can potentially utilize against any government action they perceive as tyrannical.

This fact, coupled with the Oath Keepers' penchant for conspiracy theories (including Qanon), is what makes the group exceptionally dangerous. Conspiracy theories are shared regularly on the Oath Keepers website. Oath Keepers founder and leader, Elmer "Stewart" Rhodes, is a frequent guest on the show InfoWars, hosted by conspiracy theorist Alex Jones. As a result, an organization with thousands of members, many of whom possess real-world detainment and combat capabilities, are relying on conspiracy theories to determine who they identify as tyrannical.

Additionally, the Oath Keepers are tied to the Constitutional Sheriffs and Peace Officers Association (CSPOA), a pro-militia antigovernment extremist group whose leaders are linked to various other extremist conspiracy theorists and white supremacists. Richard Mack, the former Sheriff of Graham County, Arizona, the leader of CSPOA, was an Oath Keepers board member until 2016. Mack has publicly stated "The greatest threat we face today is not terrorists. It is our own federal government."

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<sup>24</sup> Hatewatch Staff and Goldwasser R. (2021, February 12). "Well Before The Jan. 6 Insurrection, Oath Keepers Trafficked in Violence and Conspiracy Theories," *Southern Poverty Law Center*. <https://www.splcenter.org/hatewatch/2021/02/12/well-jan-6-insurrection-oath-keepers-trafficked-violence-and-conspiracy-theories>.



### **Promoting Dangerous Theories: County Supremacy and Constitutional Sheriffs**

Oath Keepers and CSPOA believe in the false notion of county supremacy, which submits that county authority supersedes federal authority. This belief has animated portions of the antigovernment movement since the 1970s.<sup>25</sup> Adherents believe counties are entitled to control land that is currently owned and preserved by the federal government. This assertion by members of the antigovernment movement, chiefly militias, has led them to conduct various skirmishes and standoffs against federal agencies and agents, particularly in the West where Bureau of Land Management (BLM) staff are habitually villainized by the antigovernment movement. For example, the standoff in Bunkerville, Nevada in 2014, was supported by Stewart Rhodes and Richard Mack.

From 2013 to 2017 at least 360 threats and assaults were directed towards federal land management employees, according to a 2019 report by the Government Accountability Office (GAO). The report additionally cites that the Federal Bureau of Investigation identified anti-government extremism as a domestic terrorism threat to federal land management agencies and employees.<sup>26</sup>

Also embodied in the concept of county supremacy is the belief that county sheriffs possess ultimate law enforcement authority. “Let me make this real clear,” Mack has said “the President of the United States cannot tell your sheriff what to do. I don’t care if its George Washington himself, they cannot tell us what to do.”

This is untrue. Although county sheriffs are democratically elected and hold wide discretion over many of their office’s responsibilities, the supremacy clause of the United States constitution asserts the clear primacy of federal law over state or local laws.

The foundational beliefs of constitutional sheriffs defy this evident concept while also attempting to define their position as constitutional discipleship. They believe that laws passed down from the federal, state, or city government are *only enforceable* when the sheriff interprets them as constitutional. Mack has stated publicly, in a May 3, 2020 video circulated on YouTube, that in addition to the federal government, sheriffs can tell the chief of police, city council, and the town/city manager what to do.<sup>27</sup>

On February 23, 2021, Mack shared the following example in a widely-viewed online video. “Now, I’m not a current sheriff,” he said, “but when I was sheriff, I actually kicked out the army core of engineers and the EPA out of my county because they got in the way of us fixing a bridge that needed to be fixed. They wouldn’t let us fix it because they think they own everything. They own the bridge, they own the

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<sup>25</sup>Lenz, R. and Potok, M. (2016, June 13). “Line In the Sand,” Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/intelligence-report/2016/line-sand>

<sup>26</sup> United States Government Accountability Office, “Federal Land Management Agencies: Additional Actions Needed to Address Facility Security Assessment Requirement 1–6” (2019).

<sup>27</sup>“Sheriff Richard Mack Describes How Sheriffs Can Save Our Country” *Banned.Video*, uploaded by The American Journal 23 Feb. 2021, <https://banned.video/watch?id=603577b3d2da0d1641c333a4>.

rivers, they own our land and quite frankly, they don't even live there, and so we had to go round them and get them out of the way for us to take care of business.”<sup>28</sup>

When acted on, as in Mack's case, these beliefs by CSPOA and other constitutional sheriffs put them in direct contravention of the law. This, along with their willingness to work with militias and other extremists to further their cause, is what makes constitutional sheriffs potentially dangerous to the American public and to the rule of law in the United States.

A 2019 study, *Contentious Federalism: Sheriffs, State Legislatures, and Political Violence in the American West*, found that the occurrence of political violence against BLM employees increases by 50 percent in counties with a constitutional sheriff.<sup>29</sup>

Most recently, several sheriffs across America, including CSPOA and Protect America Now members, refused to enforce state of emergency orders relating to the Covid-19 pandemic. Because federal and state governments had not previously taken this situation into consideration, they were unable to compel these sheriffs to follow the law themselves or to oblige them to enforce the law amongst their constituents.<sup>30</sup>

CSPOA has also requested that sheriffs refuse to enforce any new laws that they interpret as infringing on the Second Amendment. The group started this initiative in 2013 and continues to lobby sheriffs with mixed results. However, this year the landscape has changed – almost half the counties in the United States have passed Second Amendment sanctuary resolutions.<sup>31</sup> These resolutions vary greatly but all claim to refuse to enforce gun laws they perceive as violating the Second Amendment. A smattering of counties has taken the additional step of declaring their counties “constitutional counties,” stating they will not enforce any laws they perceive as violating the Constitution.<sup>32</sup>

These resolutions are essentially toothless, since local jurisdictions cannot legally override existing state and federal legislation. However, that does not mean these resolutions do not have any real-world impact. With county governments and county constitutional sheriffs in alignment on this issue, state and federal government officials may be forced to take action to prevent counties led by constitutional sheriffs from disregarding any duly enacted laws they personally deem unconstitutional.

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<sup>28</sup> Battle Mountain Chamber of Commerce. (2021, April 30). ALL VENDORS, stores, and the entire community.... PLEASE come join us for Battle Mountain Patriotic Social Gathering. There will be over 300 people attending, so all vendors can come set up for free at Elquist Park for FREE! Retrieved from <https://www.facebook.com/BMCHAMBER/posts/5589475291124801>

<sup>29</sup> Nemerever, Z. (2021). "Contentious federalism: Sheriffs, state legislatures, and political violence in the American West," *Political Behavior*, 43, 247-270. doi:10.1007/s11109-019-09553-

<sup>30</sup> Dowd, T. (2020, November 17). "These US Sheriffs Are Refusing to Enforce COVID Restrictions," *Vice*. <https://www.vice.com/en/article/epdxqi/these-us-sheriffs-are-refusing-to-enforce-covid-restrictions>

<sup>31</sup> Williams, L. (2021, May 6). "Nearly half of all U.S. counties are now Second Amendment Sanctuaries," *Ammoland*. <https://www.ammoland.com/2021/05/half-of-us-counties-second-amendment-sanctuaries/#axzz6vhsroJhA>

<sup>32</sup> Hood, J. (2020, March 3). "Pendleton County signs resolution to become 'Constitutional County'," *WHSV3*. <https://www.wHSV.com/content/news/Pendleton-County-signs-resolution-to-become-Constitutional-County-568451481.html>.



This possibility of necessary intervention could create a dangerously combustible situation. Federal and state governments have no standardized enforcement mechanism for compelling sheriffs and county government personnel to enforce state or federal law.

While CSPOA encourages sheriffs to defy laws they consider unconstitutional, Oath Keepers and other groups have been lobbying sheriffs' offices to deputize militias and citizens as armed sheriff's posse's using new gun legislation as an example of situations when the sheriffs would need one.

Here are some examples of sheriffs who have confirmed their support for establishing posses:

- Culpeper County Sheriff Scott Jenkins stated in a December 3, 2019 meeting that his office would fight gun control laws in court but "In addition, if necessary, I plan to properly screen and deputize thousands of our law-abiding citizens to protect their constitutional right to own firearms."<sup>33</sup>
- Clay County, Florida Sheriff Darryl Daniels released a video on June 30, 2020 saying "I'll make special deputies of every lawful gun owner in this county" before walking back his comments when they became publicly controversial.<sup>34</sup>
- Pinal County, Arizona constitutional sheriff Mark Lamb, who is on the advisory committee of the Protect America Now organization, along with additional constitutional sheriffs, launched a Pinal County "citizens posse" in 2020. Participants who have passed a minimal background check are offered courses in constitutional law, use of force, search and seizure, firearm safety and home safety.<sup>35</sup> In response to questions about how the posse would be utilized, Lamb said "Those are great questions. I don't think I could articulate exactly what they would do because we don't know; I mean each emergency is very different, (according to) what we may need from those people."<sup>36</sup>

In addition to sheriffs forming posses that could be used to defend against the enforcement of state and federal laws, in 2021, at least one county has made explicit their intent, in writing, to arrest federal officials who actively enforce the law.

On February 3, 2021 the Newton County, Missouri Second Amendment Preservation Act was introduced, which states that federal agents will be subject to arrest by the Newton County Sheriff's

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<sup>33</sup> Anne, A. (2019, December 7). "Virginia sheriff vows to deputize residents in response to potential gun restrictions," *WDBJ7*. <https://www.wdbj7.com/content/news/Virginia-Sheriff-vows-to-deputize-residents-ahead-of-potential-565924821.html>

<sup>34</sup> Howard, J. (2020, July 1). "Clay County Sheriff clarifies statement about making 'special deputies of lawful gun owners,'" *First Coast News*. <https://www.firstcoastnews.com/article/news/local/clay-county-sheriff-says-hed-make-special-deputies-of-lawful-gun-owners/77-0157b1f2-8f61-41b9-8430-eda454198b2e>.

<sup>35</sup> Pinal County Sheriff's Office. *Citizen's Posse*. <https://www.pinalcountyaz.gov/Sheriff/Organizations/Pages/CitizensPOSSE.aspx>.

<sup>36</sup> Cowling, M. (2020, August 12). "New 'citizens posse' draws big response from public," *Maricopa Monitor*. [https://www.pinalcentral.com/maricopa\\_monitor/news/new-citizens-posse-draws-big-response-%20%20%20from-public/article\\_74ddb556-3aef-5307-9a38-a43b8ebfedb2.html](https://www.pinalcentral.com/maricopa_monitor/news/new-citizens-posse-draws-big-response-%20%20%20from-public/article_74ddb556-3aef-5307-9a38-a43b8ebfedb2.html)

department if they attempt to enforce federal laws, order or rules they interpret as infringing on the right to keep and bear arms.”<sup>37</sup>

Antigovernment groups, some of whom are linked to local law enforcement, would likely support this action. One of the 2012 sheriffs’ candidates for Joplin County, which is adjacent to Newton County, currently claims to be an Oath Keeper and a supporter of CSPOA and has a history of working for the Newton and Jasper county sheriff’s departments, along with the Joplin Police Department. Missouri also has two active Oath Keepers chapters, along with 16 antigovernment groups, including militias, sovereign citizens and People’s Rights, a chapter of an organization headed by antigovernment activist Ammon Bundy.

Unfortunately, groups with these ideologies are not limited to the state of Missouri. In 2020, the Southern Poverty Law Center found 566 active antigovernment groups across all 50 U.S. states, including 169 militias. This includes Oath Keepers chapters, which were active in over 40 different states.<sup>38</sup>

On May 15, 2021 CSPOA awarded a plaque to Lander County, Nevada which became the first CSPOA county in America. County commissioners arranged to pay a membership fee that would entitle the entire county to CSPOA membership and celebrated at an event in Battle Mountain, Nevada. One event guest, Denise Aguilar, the leader of the all-woman militia group Mamamilitia, claimed they were introducing “the model county of what the nation should be looking at.”<sup>39</sup>

Richard Mack has likewise suggested additional CSPOA counties could be formed, and used the event to promote CSPOA’s newest endeavor, a cross country tour with several conspiracy theorists to promote his group among sheriffs and citizenry alike.<sup>40</sup>

### **Antigovernment and White Nationalist Crossover**

Historically, there is broad overlap between antigovernment extremists and the organized white power movement. Indeed, the militia movement was born out of white power mobilization in the 1970’s, and both shared leaders, membership, and motivations.<sup>41</sup>

In recent years, antigovernment extremists and militias have turned their ire on Muslim and immigrant communities, which they believe – similar to the white power movement – represent an existential threat to the nation. This has resulted in violent plots and attacks. In 2016, members of a militia in Kansas planned to bomb a mosque and apartments that housed Somali immigrants in Garden City, Kansas and,

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<sup>37</sup> Newton County Commission. Newton County Second Amendment Preservation Act. 2021, February 23.

<https://www.newtoncountymo.com/notices/newton-county-second-amendment-preservation-act>.

<sup>38</sup> “Antigovernment Movement,” Southern Poverty Law Center. (2021). <https://www.splcenter.org/fighting-hate/extremist-files/ideology/antigovernment>.

<sup>39</sup> “Battle mountain Nevada ! Lander county has modeled a free county!” *TikTok*, uploaded by denisefreedomangel, 12 May. 2021, <https://www.tiktok.com/@denisefreedomangel/video/6961522935567797510>.

<sup>40</sup> Battle Mountain Chamber of Commerce. (2021, April 30). ALL VENDORS, stores, and the entire community.... PLEASE come join us for Battle Mountain Patriotic Social Gathering. There will be over 300 people attending, so all vendors can come set up for free at Elquist Park for FREE! Retrieved from <https://www.facebook.com/BMCHAMBER/posts/5589475291124801>

<sup>41</sup> Belew, K. (2018). “Bringing the war home: The white power movement and paramilitary America.” *Harvard University Press*.

the next year, two members of the White Rabbits militia bombed a Minnesota mosque attempting to scare Muslims into leaving the United States.<sup>42</sup>

Militia members also have a history of harassing immigrants at the border. In 2019, United Constitutional Patriots, a militia of QAnon adherents led by felon Larry Hopkins, aka Johnny Horton Jr., performed vigilante border patrols in New Mexico and Texas. The group detained migrants at gunpoint, and at least one group member, James Christopher Benvie, impersonated a Border Patrol agent and was later arrested for executing this criminal offense.<sup>43</sup>

More recently, the Arizona militia group Veterans on Patrol, which also embraces QAnon conspiracy theories, made it their mission to harm or destroy water stations set out by humanitarian groups to save immigrants from severe, often deadly dehydration, and set up decoy stations to lure immigrants into their camps.

Constitutional sheriffs are a concept that originally came from members of the antisemitic Christian Identity movement, which believes that white people are the true Israelites, believed to be God's chosen people, which are referenced in the bible.<sup>44</sup> The group, led by William Potter Gale, devised the idea of county supremacy in the 1970's, coining it *posse comitatus* "power of the county."<sup>45</sup>

The links between this movement and white supremacy still exist. The National Operations Director for CSPOA, Sam Bushman, owns *Liberty News Radio Network*<sup>46</sup> He syndicates his own radio show *Liberty RoundTable*, which has hosted a multitude of antigovernment guests, including Stewart Rhodes. He also syndicates the white nationalist show *Political Cesspool*.

Moreover, Bushman's radio network syndicates the following shows where the hosts and a portion of the guests are known extremists:

- *Patriot Radio – Matt Shea Show* which is hosted by former Washington State Representative Shea who is tied to a plethora of antigovernment groups and was accused of participating in domestic terrorism, according to a report prepared for the Washington State legislature in 2019.<sup>47</sup>
- *Gun Owners News Hour* hosted by antigovernment organization Gun Owners of America. Founder Larry Pratt left the Pat Buchanan campaign after he was linked to white supremacists.<sup>48</sup>

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<sup>42</sup> Hegeman, R. (2019, January 25). "Militia members get decades in prison in Kansas bomb plot," *Associated Press*. <https://apnews.com/article/immigration-north-america-us-news-massacres-ks-state-wire-b3a41503845a4cdaa182ed79bd7083e1>;

Forliti, A. (2019, January 24). "2 militia members admit role in attack on Minnesota Mosque," *Associated Press*. <https://apnews.com/article/68c7fd8014424480932e663d73d46cc1>

<sup>43</sup> United Constitutional Patriots. Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/extremist-files/group/united-constitutional-patriots>.

<sup>44</sup> Christian Identity. Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/extremist-files/ideology/christian-identity>

<sup>45</sup> "Hate Group Expert Daniel Levitas Discusses Posse Comitatus, Christian Identity Movement and More." Southern Poverty Law Center. (1998, June 15). <https://www.splcenter.org/fighting-hate/intelligence-report/1998/hate-group-expert-daniel-levitas-discusses-posse-comitatus-christian-identity-movement-and>.

<sup>46</sup> Liberty News Radio Program Schedule. <http://www.libertynewsradio.com/schedule>

<sup>47</sup> Associated Press. (2019, December 19). "Washington state Rep. Matt Shea engaged in 'domestic terrorism,' report says. *Los Angeles Times*." <https://www.latimes.com/politics/story/2019-12-19/washington-matt-shea-domestic-terrorism>

<sup>48</sup> Skidmore, G. (2018, July). "Larry Pratt: 5 Fast Facts You Need to Know." *Heavy*. <https://heavy.com/news/2018/07/larry-pratt/>

- *Political Cesspool*, a show hosted by white nationalist James Edwards. The show motto is: “Pro-Christian (God), Pro-White (Family), Pro-South (Republic).”<sup>49</sup> Edwards’ guests have included CSPOA’s Sam Bushman, who Edward considers a friend, Richard Mack, and Oath Keeper Eddie Miller.

The show has also invited a plethora of white supremacists to appear. This list includes:

- David Duke, longtime Klan leader, neo-Nazi, and international spokesman for Holocaust denial;<sup>50</sup>
- Former professor Michael Hill of neo-confederate group League of the South;<sup>51</sup>
- Jared Taylor, who founded the white nationalist pseudoscience think tank New Century Foundation;<sup>52</sup>
- Retired white nationalist professor Kevin McDonald;<sup>53</sup> and
- Council of Conservative Citizens, the white nationalist group on which Edwards has held a seat on the board.<sup>54</sup>

Sam Bushman and James Edwards are the current nexus of the antigovernment and white nationalist movements. Standing shoulder to shoulder at *Liberty News Radio*, they increased the visibility of both movements and their shows are locations where members of both movements have the opportunity to network and share information. Their combined support for militias and constitutional sheriffs, confederate monuments, and segregation are pushed out over U.S. airwaves each week. According to the *Liberty News Radio* website, “Live and archived programming is available on the Internet, phone feed, and via the Roku Player, Amazon Echo Devices as well as many other new technologies; 24/7.”

## **Policy Recommendations**

### **Speak out against hate and extremism.**

Words matter. It is impossible to overstate the importance of civic and law enforcement leaders using their public platforms and bully pulpits to condemn hate and extremism. Failure to do so emboldens extremists – as we saw dramatically demonstrated during the Trump administration. There is an urgent need for governors, mayors, police executives, and federal, state, and local legislators to speak out – and to act – against bias-motivated criminal activity and violent extremism.

<sup>49</sup> James Edwards. Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/extremist-files/individual/james-edwards>

<sup>50</sup> David Duke. Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/extremist-files/individual/david-duke>

<sup>51</sup> Michael Hill. Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/extremist-files/individual/michael-hill>

<sup>52</sup> Jared Taylor. Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/extremist-files/individual/jared-taylor>.

<sup>53</sup> Kevin MacDonald. Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/extremist-files/individual/kevin-macdonald>.

<sup>54</sup> “Council of Conservative Citizens,” Southern Poverty Law Center. <https://www.splcenter.org/fighting-hate/extremist-files/group/council-conservative-citizens>.

**Investigate and prosecute the activities of violent militias and other extremist groups.**

An excellent example is the case law enforcement authorities have made against members of the Michigan Wolverine Watchmen militia and the other accomplices in the alleged kidnapping plot against Governor Gretchen Whitmer. Through the use of confidential informants, law enforcement authorities have built a strong case against the alleged perpetrators.<sup>55</sup>

**Enforce current laws.**

Every state prohibits private militias<sup>56</sup> and many states have laws prohibiting paramilitary training in furtherance of, or in preparation for, a civil disorder.<sup>57</sup> Federal and state authorities should take action to raise awareness about these laws – and enforce them.

**Hold accountable those responsible for the January 6 deadly US Capitol assault and insurrection.**

The insurrection at the Capitol, which destroyed property, injured dozens of officers, and left five people dead, was a wake-up call to our nation. We cannot afford to ignore it – because the extremist ideologies and conspiracy theories that fueled the attack are not going away anytime soon.

The federal government should prosecute the insurrectionists responsible to the fullest extent of the law. In addition, public figures involved in inciting and giving encouragement to the armed insurrectionists who stormed the Capitol should be permanently deplatformed from all social media. And corporations should permanently suspend political donations to Members of Congress and other elected officials that helped incite the violent siege.

**Enact the Domestic Terrorism Prevention Act (DTPA).**

The DTPA would establish offices within the Department of Homeland Security (DHS), the Department of Justice, and the FBI to monitor, investigate, and prosecute cases of domestic terrorism – and require these offices to regularly report to Congress. Passed overwhelmingly by the House of Representatives last September, this legislation would also provide resources to strengthen partnerships with state and local law enforcement authorities to confront far-right extremism and create an interagency task force to explore white supremacist activities within the US armed forces and federal law enforcement.

**Reject efforts to create a new criminal domestic terrorism statute – or the creation of a listing of designated domestic terrorist organizations.**

A new federal criminal domestic terrorism statute is unnecessary. Federal law enforcement authorities already have the tools and authority they need to effectively investigate and prosecute white supremacist and other domestic terror groups. Creating a list of designated domestic terrorist organization would be divisive, partisan, and highly political. Such a list would threaten First Amendment free speech rights and

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<sup>55</sup> *US v. Fox, et al*, <https://assets.documentcloud.org/documents/20692901/michigan-superseding-indictment.pdf>

<sup>56</sup> *Prohibiting Private Armies at Public Rallies*, Institute for Constitutional Advocacy and Protection, Georgetown University Law Center, <https://www.law.georgetown.edu/icap/wp-content/uploads/sites/32/2018/04/Prohibiting-Private-Armies-at-Public-Rallies.pdf>

<sup>57</sup> <https://www.law.georgetown.edu/icap/our-work/addressing-the-rise-of-unlawful-private-militias/state-fact-sheets/>

could be used to expand racial profiling or be wielded to surveil and investigate communities of color and political opponents in the name of national security.

SPLC joined over 150 national civil rights groups on a January 19, 2021 Leadership Conference on Civil and Human Rights letter opposing a new federal criminal domestic terrorism charge.<sup>58</sup>

**End funding for police militarization and the transfer of excess military property to law enforcement agencies (1033 Program).**

Since it was established in the 1997 FY National Defense Authorization Act, the 1033 Program has facilitated the transfer of more than \$7.4 billion in surplus military equipment to local, state, and federal law enforcement agencies. Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP) have both received military equipment from the program, which proved particularly concerning last summer as we watched those agencies and others deploy to American cities in response to protests sparked by the murder of George Floyd. Police militarization disproportionately exposes communities of color to police violence, and it inflames the paranoia of the extreme right, which uses state-sponsored violence as evidence of government tyranny and impending civil war.

**Improve federal hate crime data collection, training, and prevention.**

Data drives policy. We cannot address what we are not accurately measuring. The FBI's annual Hate Crime Statistics Act (HCSA) report<sup>59</sup> is the best national snapshot of hate violence in America, but data received from the 18,000 federal, state, local, and tribal law enforcement agencies is vastly underreported – in part because reporting is not mandatory.

Thirty years after the FBI began collecting and reporting hate crime data, large gaps continue to exist. While the FBI's annual HCSA report uncovers larger trends, it vastly underestimates the extent of the problem because local law enforcement agencies are not required to report hate crime data. In 2019, the most recent HCSA report, 86% of the nation's 18,000 law enforcement agencies either affirmatively reported that they had zero (0) hate crimes, or they did not report any data to the FBI at all — including some 80 cities over 100,000 in population. And while the FBI reported 7,314 incidents nationwide, other governmental studies show there are an average of 250,000 hate crime victimizations each year.

The newly enacted Covid-19 Hate Crime Act, which includes the provisions of the Khalid Jabara and Heather Heyer National Opposition to Hate, Assault, and Threats to Equality Act of 2019 (NO HATE Act), should be immediately implemented. The new law will address the disturbing rise in hate violence directed against Asian American communities and will also help improve the response to hate crimes directed against other people of color, religious minorities, immigrants, people with disabilities, and LGBTQ communities. In addition, the law authorizes incentive grants to spark improved local and state

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<sup>58</sup> <https://civilrights.org/resource/135-civil-rights-organizations-oppose-a-new-domestic-terrorism-charge/>

<sup>59</sup> FBI, 2019 FBI Hate Crime Statistics, <https://ucr.fbi.gov/hate-crime/2019>



hate crime training and data collection initiatives, as well as state-based hotlines to connect victims with support services.

In addition, Congress should provide additional funding for the Justice Department’s Civil Rights Division – to allow for the hiring of additional attorneys focused on enforcing federal civil rights and hate crime laws – and for the Justice Department’s Community Relations Service – to allow for the hiring of new professional to help mediate, train, and facilitate in communities with intergroup tensions and in the aftermath of hate crimes.

**Fund prevention initiatives to steer individuals away from hate and extremism.**

The law is a blunt instrument to confront hate and extremism; it is much better to prevent these criminal acts in the first place. Congress should shift funding away from punishment models and toward the prevention of violent extremism. These programs are better housed in the Department of Education and Department of Health and Human Services than DHS or other national security agencies.

Since it is not possible to legislate, regulate, or tabulate racism or hatred out of existence, we need federal and state government leadership to promote anti-bias, anti-hate, and democracy-building education programs – like SPLC’s Learning for Justice resources<sup>60</sup> – in our nation’s schools. Especially in these divided and polarized times, every elementary and secondary school should promote an inclusive school climate and activities that celebrate our nation’s diversity.

Programs and processes that intervene ethically in the lives of individuals – often called “deradicalization” efforts – should also be promoted. More than 70 million children and young adults, for example, have been learning primarily at home. They experienced a summer vacation with no camps, employment, or other structured activities. Extremists and hate groups see this as an ideal time to exploit youth grievances about their lack of agency, their families’ economic distress, and their intense sense of disorientation, confusion, fear, and anxiety. In the absence of their usual social support systems and networks of trusted adults and peers, young people can become targets for the far right, who promise easy answers online about who they can blame for their plight.

Last June, SPLC and American University’s Polarization and Extremism Research and Innovation Lab (PERIL) released a guide to help parents and caregivers understand how extremists are exploiting this time of uncertainty and unrest by targeting children and young adults with propaganda. The guide, *Building Resilience & Confronting Risk in the COVID-19 Era*,<sup>61</sup> is designed for caregivers, parents, educators, and others who are on the front lines of recognizing and responding to radicalization in the COVID-19 era. The SPLC/PERIL guide provides parents and caregivers with tangible steps to confront and counter this threat.

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<sup>60</sup> <https://www.learningforjustice.org/>

<sup>61</sup> <https://www.splcenter.org/PERIL>

### **Restrict access to firearms for extremists.**

Our research documents that 59% of domestic terrorist attacks carried out between April 1, 2009 and February 1, 2015 were perpetrated with a gun. Federal and state officials should adopt reasonable gun violence prevention initiatives to help prevent violent extremists from acquiring weapons. In addition, federal and state official should ban firearms in and around state capitols and at polling places.<sup>62</sup>

**Prevent white supremacists and other extremists from serving in the US armed forces.** Congress and the Department of Defense should invest in programs that steer individuals away from extremism and deradicalize those who have adopted extremist beliefs or joined hate groups. Evidence-informed trainings should be developed, designed to inoculate against radicalization at entry, throughout one's military career, and reentry into civilian life. In addition, the Department of Defense should mandate an annual climate survey on extremism and an annual report from military leadership that includes an audit of all investigations and prevention measures taken regarding white supremacist activity within the ranks of the military. These reports should, to the largest degree possible, be made public so that they can inform the military's response to this problem going forward.

### **Identify and promote best practices to build community-based prevention and resilience.**

Communities must be empowered to promote public safety in ways that do not center law enforcement responses:

- Information sharing can help community organizers choose safe locations for protests/vigils/actions.
- Community organizations need education about different symbols and ideologies of violent militia extremist groups they might encounter.
- Community, business, and elected leaders should be encouraged to speak out against political violence and voter intimidation.<sup>63</sup>

### **Promote democracy-building, anti-racist, and civics education engagement initiatives.**

Congress should provide funding for the Department of Education to develop a curriculum on structural racism and funding for states to implement their own related initiatives. Americans can only dismantle white supremacy if they understand how racism shaped (and continues to shape) housing, education, policing, health care and other policies and practices that affect our everyday lives.<sup>64</sup>

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<sup>62</sup> In Michigan, in the aftermath of the alleged plot to kidnap Governor Whitmer, Secretary of State Jocelyn Benson issued an order prohibiting the open carrying of a firearm in a polling place, in any hallway used by voters to enter or exit, or within 100 feet of any entrance to a building in which a polling place is located. <https://www.nytimes.com/2020/10/16/us/elections/michigans-top-elections-official-bans-open-carry-of-guns-at-polling-places.html>

<sup>63</sup> A good example of this is the *United Against Hate and Political Violence on May Day* statement, coordinated by the Western States Center, <https://www.westernstatescenter.org/mayday2021>

<sup>64</sup> "One of SPLC's essential partners in work to counter paramilitarism and political violence is Western States Center, a group based in the Pacific Northwest and Mountain States that serves as a national hub to engage partners committed to strengthening inclusive democracy. Led by Eric K. Ward, who is also an SPLC senior fellow, Western States Center works to equip democratic institutions, elected leaders, organizations, and communities with innovative tools and strategies to respond effectively to and manage the threat of white nationalism and anti-democratic movements, including their valuable toolkit, *Confronting White Nationalism in Schools*, <https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/4/ConfrontingWhiteNationalismInSchoolsToolkit.pdf>

SPLC believes that public schools are the nation's most important engine of democracy, the single most critical space for organic leadership development and bringing young people into their own social and political consciousness. They must be spaces for lively

Congress should enact legislation and fund Department of Education initiatives to provide incentives for states to mandate civics education for all public schools. In 2018, a national survey and a series of focus groups studied the causes of weakening confidence in government and difficulties in understanding key pillars of our democracy, such as the rule of law and a free press. One of the four recommendations of the project, undertaken by Freedom House, the George W. Bush Institute, and the Penn Biden Center for Diplomacy and Global Engagement, was to fund and promote “improved and expanded civic education, including the teaching of democracy’s basic concepts.”<sup>65</sup> In 2018, only nine states and the District of Columbia required one year of study in U.S. government and civics. Thirty-one states required only a half-year of civics or government education, and 10 states had no civics requirement at all.<sup>66</sup> Civic education can also help youth gain “an understanding of the processes of government, prevalent political ideologies, civic and constitutional rights, and the history and heritage of the above.”<sup>67</sup>

Thank you for holding this important hearing and for your continued leadership in working to address violent hate and extremism in a constitutional and effective manner. We look forward to working with you as you continue to focus your urgent attention to this important issue.

Sincerely,

*Susan Corke*

Susan Corke  
Intelligence Project Director

Rachel Goldwasser

Rachel Goldwasser  
Research Analyst, Intelligence Project

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discourse, deliberation, and consciousness-raising. To elevate these principles, [SPLC Action Fund submitted](https://www.splcactionfund.org/sites/default/files/SPLC%20Action%20Fund%20comments%20for%20OESE%20proposed%20priorities%20for%20the%20American%20History%20and%20Civics%20Education%20program.pdf) detailed comments for the Department of Education in response to their proposed funding priorities related to American history and civics initiatives.

<sup>65</sup> George W. Bush Institute, Freedom House, and Penn Biden Center, “Reversing a Crisis in Confidence,” (June 26, 2018), <https://www.bushcenter.org/about-the-center/newsroom/press-releases/2018/06/democracy-project-reversing-a-crisis-of-confidence.html>

<sup>66</sup> John Shattuck, Carr Center for Human Rights Policy, Harvard Kennedy School, “Reimagining Rights and Responsibilities in the United States: Toward a More Equal Liberty.” [https://carrcenter.hks.harvard.edu/files/cchr/files/201007\\_rr-executive-summary.pdf](https://carrcenter.hks.harvard.edu/files/cchr/files/201007_rr-executive-summary.pdf)

<sup>67</sup> Rebecca Winthrop, “The need for civic education in 21st-century schools,” The Brookings Institute, (June, 2020), <https://www.brookings.edu/policy2020/bigideas/the-need-for-civic-education-in-21st-century-schools/>