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10 Attorneys for Plaintiff Randall Kowalke

11 IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

12 THIRD JUDICIAL DISTRICT AT ANCHORAGE

13 RANDALL KOWALKE,)

14 Plaintiff,)

15 vs.)

16 DAVID EASTMAN, STATE OF)
17 ALASKA, DIVISION OF ELECTIONS,)
18 and GAIL FENUMIAI in her official)
19 capacity as Director of Elections)

20 Defendant.)

21 Case No. 3AN-22-07404 CI

22 AFFIDAVIT OF JONATHAN LEWIS

23 STATE OF District of Columbia)
24 Washington) ss.
25 COUNTY)

26 JONATHAN LEWIS, being first duly sworn upon oath, deposes and states as
27 follows:
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1 1. I am over the age of 18 years and have personal knowledge
2 of the statements contained this affidavit.

3
4 2. I am a research fellow with the Program on Extremism at George
5 Washington University. I have served in this position since December 2018. The
6 Program on Extremism is a nonpartisan research center that spearheads
7 innovative and thoughtful academic inquiry, produces empirical work and
8 develops pragmatic policy solutions related to all forms of extremism in the United
9 States.
10

11 3. My research focuses on both homegrown violent extremism and
12 domestic violent extremism, relying on data-driven analysis to produce policy-
13 oriented products on the most significant threats to the homeland. My recent
14 research has included examination of two specific facets of the U.S. government's
15 classification schema related to domestic violent extremism: Racially and
16 ethnically motivated violent extremists (REMVE), and Anti-Government or Anti-
17 Authority Violent Extremists (AGAAVE). Within these categories, my analysis has
18 focused on two of the most active and dangerous elements of the threats — white
19 supremacist and anti-government movements operating in the United States,
20 including the Oath Keepers.
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23
24 4. In the aftermath of the January 6 Capitol Siege, the Program on
25 Extremism launched a public repository of court records for every federally
26 charged defendant, which now consists of more than 40,000 pages of primary
27 source documents for more than 850 individuals. This repository has informed
28

1 numerous Program research products, has been consistently cited by
2 Congressional staffs on both sides of the aisle, and been used in hundreds of media
3 reports related to January 6.
4

5 5. Through the Program's analysis into the January 6 Capitol Siege,
6 I have produced numerous reports, articles, op-eds, and conducted dozens of
7 interviews on the events of January 6, the groups and individuals involved, legal
8 proceedings against defendants, and the broader domestic violent extremist
9 landscape. In following the primary source evidence and court records, a significant
10 portion of this work has focused on one of the domestic violent extremist groups
11 alleged to have taken on predominant roles in the January 6 Capitol Siege: the
12 Oath Keepers.
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15 6. The Oath Keepers group is an anti-government, anti-authority,
16 right-wing extremist organization that was formed in 2009 by Elmer Stewart
17 Rhodes. Since its inception, the group has been primarily focused on conflict with
18 a federal government it perceives to be inherently tyrannical. While the federal
19 government and its representatives have long been the most significant target for
20 the rhetoric and activities of the Oath Keepers, members of the group have held
21 white supremacist beliefs and key figures within the organization have frequently
22 promoted racist and antisemitic conspiracy theories.
23
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25 7. The permissive environment created by Rhodes allowed for a
26 significant overlap between conventional anti-government extremist ideologies
27 and other violent extremist narratives, including antisemitism, Holocaust denial,
28

1 and more. David Eastman, specifically, is a clear example of this trend. Not only
2 has David Eastman espoused the violent goals of the Oath Keepers both before and
3 after their role in the January 6 Capitol Siege, public reporting has made clear
4 that his white supremacist rhetoric and antisemitic worldview has increasingly
5 aligned with the Oath Keepers' embrace of fascism. Eastman compared a speech
6 by President Biden to one given by Adolf Hitler, promoted the openly antisemitic
7 "Protocols of Zion," and took photographs in front of an Adolf Hitler quote on the
8 subject of the extermination and annihilation of 'undesirable' individuals during
9 the Holocaust. These actions illustrate a close alignment with the vision and goals
10 of the Oath Keepers.
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14 8. Throughout 2020, the Oath Keepers increasingly assumed an
15 openly hostile stance toward the political status quo in the United States. This
16 hostile stance was largely predicated on the embrace of the "Stop the Steal"
17 conspiracy theory, defined by the belief that President Biden illegitimately
18 assumed office due to fraudulent vote tallies.
19

20 9. Preparations for the eventual operation at the U.S. Capitol by
21 members of the Oath Keepers are alleged to have begun as early as November 5,
22 2020, when Rhodes allegedly sent a message on the encrypted messaging
23 application Signal to an invite-only Oath Keepers group chat titled 'Leadership
24 intel sharing secured', in which he urged his followers to refuse to accept the
25 election result.
26
27

28 10. According to the charging documents against Oath Keepers

1 indicted for their role in the events of January 6, Rhodes held a private virtual
2 meeting with Oath Keepers members on November 9, 2020. During this meeting,
3 Rhodes allegedly outlined a plan to stop the lawful transfer of presidential power,
4 “including preparations for the use of force, and urged those listening to
5 participate.” This private planning aligned with his public rhetoric, which was
6 evident at the Jericho March in Washington, D.C., on December 12, 2020, as
7 Rhodes gave a speech to the crowd, calling on President Trump to invoke the
8 Insurrection Act to remain in power, threatening that if he did not do so, the Oath
9 Keepers would be forced to engage in a “much more desperate [and] much more
10 bloody war’ to ensure that outcome.”
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14 11. On December 14, 2020, Rhodes published a letter on the Oath
15 Keepers website “advocating for the use of force to stop the lawful transfer of
16 presidential power.” In another open letter on December 23, 2020, Rhodes claimed
17 that “tens of thousands of patriot Americans, both veterans and non-veterans, will
18 already be in Washington, D.C. and many of us will have our mission critical gear
19 stowed nearby just outside D.C.”
20

21 12. On January 4, 2021, Rhodes posted another article on the Oath
22 Keepers website, claiming that, “It is CRITICAL that all patriots who can be in DC
23 get to DC to stand tall in support of President Trump’s fight to defeat the enemies
24 foreign and domestic who are attempting a coup, through the massive vote fraud
25 and related attacks on our Republic. We Oath Keepers are honor-bound and eager
26 to be there in strength to do our part.”
27
28

1 13. According to federal indictments, by January 4 and 5, 2021,
2 members of the Oath Keepers' January 6 conspiracy are alleged to have planned
3 and executed travel to the Washington, D.C., area. Upon arrival, multiple Oath
4 Keepers are alleged to have transported firearms, ammunition, and related items
5 to the D.C. area, with many dropping off their items at the QRF hotel in Ballston,
6 Virginia. Several Oath Keepers also allegedly took their firearms and ammunition
7 to the Hilton Garden Inn in Vienna, Virginia, where Rhodes and several
8 coconspirators were staying on January 5, 2021. Rhodes himself is alleged to have
9 spent tens of thousands of dollars on firearms and firearms components on his
10 drive from Texas to Washington, D.C..
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14 14. On the morning of January 6, 2021, Oath Keepers defendants are
15 alleged to have traveled to meeting points in Washington, D.C., before engaging in
16 coordinated efforts to breach the U.S. Capitol and disrupt the peaceful transfer of
17 presidential power. Two distinct groups of Oath Keepers are alleged to have
18 illegally entered the Capitol, briefly occupying sections of the building before law
19 enforcement regained control of the building. To date, 32 members or affiliates of
20 the group have been charged for their role in the events of January 6: 12 for
21 engaging in a seditious conspiracy, and another 12 for conspiring to obstruct the
22 congressional proceeding during which the electoral results were due to be
23 certified. At the time of writing, 9 of the 32 have pleaded guilty, including 7 for
24 their role in these connected conspiracies.
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28 15. Based on evidence set forth in Department of Justice charging

1 documents, the Oath Keepers engaged in significant pre-planning for January 6,
2 with a singular intent in mind: to disrupt the peaceful transfer of presidential
3 power. Rhodes' rhetoric consistently advocated for violence against political
4 enemies.
5

6
7 END OF AFFIDAVIT.

8 DATED this 16th th day of September, 2022 at Washington,
9 District of Columbia
10

11
12 Jonathan Lewis
13 JONATHAN LEWIS
14

15 SUBSCRIBED AND SWORN TO before me on this 16th day of
16 September, 2022 at The UPS Store District of Columbia
17

18 Timothy J. Brown
19 Notary Public for the State of District of Columbia
20 My commission expires 2-14-2027

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22 Notary Public, District of Columbia
23 My Commission Expires 2/14/2027

