

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:19-CR-00018-ABJ
)	
ROGER J. STONE, JR.,)	
)	
Defendant.)	
_____)	

**INTERESTED PARTY AND MATERIAL WITNESS’S DR. JEROME CORSI’S
MOTION FOR LEAVE TO FILE MOTION FOR ORDER TO SHOW CAUSE TO
CONDUCT EVIDENTIARY HEARING TO DETERMINE WHETHER TO HOLD
DEFENDANT ROGER STONE IN CONTEMPT OF THIS COURT’S ORDER OF
FEBRUARY 15, 2019**

Dr. Jerome Corsi (“Dr. Corsi”), an interested party and material witness (Person 1) as set forth in the indictment of Defendant Roger Stone, hereby moves for leave to file this motion with this honorable court to hold an evidentiary hearing to determine whether to hold Defendant Stone in contempt of this Court’s Order of February 19, 2019 and prior Order of February 15, 2019.

Specifically, the February 19, 2019 Order provides:

... the conditions of defendant's pretrial release are hereby modified to include the condition that, and the February 15, 2019 media communications order is hereby modified to provide that, the defendant is prohibited from making statements to the media or in public settings about the Special Counsel's investigation or this case or any of the participants in the investigation or the case. The prohibition includes, but is not limited to, statements made about the case through the following means: radio broadcasts; interviews on television, on the radio, with print reporters, or on internet based media; press releases or press conferences; blogs or letters to the editor; and posts on Facebook, Twitter, Instagram, or any other form of social media. Furthermore, the defendant may not comment publicly about the case indirectly by having statements made publicly on his behalf by surrogates, family members, spokespersons, representatives, or volunteers. *See Exhibit A-4.*

Thus, the Order of February 19, 2019, places a total “gag order” on Defendant Stone and his surrogates and warns him that his bail could be revoked and that he could be incarcerated for further violations of his terms of release and this Order.

This Court’s February 19 order was entered after an evidentiary hearing, which found that Defendant Stone has not only violated the prior limited gag order of the Court entered on February 15, but also effectively threatened the presiding judge, the Honorable Amy Berman Jackson, by posting on his Instagram site a doctored photo of the judge with a crosshairs and gun to her head. The Court observed during the hearing that this posting could incite violence against her and implied that it could even have resulted in her being severely physically harmed or even killed by a crazed Stone supporter.

As set forth in Dr. Corsi’s previously filed amicus brief leading up to the February 15, 2019 Order, and which the Court considered in issuing this total gag order, as the order refers to witnesses and the legal counsel of witnesses, such as Dr. Corsi and his attorneys Larry Klayman and David Gray, Dr. Corsi and his counsel have been subject to continued intimidation, coercion, and threats by Stone and his surrogates, with the intention to try to get Dr. Corsi to testify falsely in Stone’s favor if he is ever subpoenaed to testify at Stone’s eventual criminal trial.

While Dr. Corsi has never defamed Defendant Stone, nor publically spoken against him, he has made it clear that he will tell the whole truth and nothing but the truth if subpoenaed to testify under oath. Indeed, this is the reason that Dr. Corsi was not accused of any wrongdoing in the indictment of Defendant Stone. While Dr. Corsi testified truthfully, he also did not participate in allegedly threatening to kill Person 2, Randy Credico, and his service dog, if Credico did not testify falsely, as Stone allegedly demanded.

In sum, the threats against material witness and Person 2 in the indictment and later threats against Dr. Corsi, his legal counsel Larry Klayman, and now even the judge presiding over this case, are obviously part of a pattern and practice by Defendant Stone that must finally be dealt with by imposing the most severe penalties.

Attached hereto as Exhibit A is the Sworn of Declaration of Dr. Corsi which likely shows that these threats are continuing, and along with the continuing defamation against Dr. Corsi and his counsel through surrogates constitute yet new egregious violations of this Court's prior orders.

Accordingly, interested party and material witness Dr. Jerome Corsi and his undersigned legal counsel respectfully move for leave to file this a motion for the Court to hold an expedited evidentiary hearing to determine whether to hold Defendant Stone in contempt of Court. Dr. Corsi and the undersigned counsel commit to testify at this hearing about all known events concerning the intimidation, coercion and threats that are continuing and have been leveled and orchestrated by Stone individually against them through surrogates, supported by documentary evidence.

Once leave for filing is granted, this motion will be supplemented as more of Defendant Stone's violative conduct is uncovered.

The Special Counsel has indicated that it takes no position on this motion and characteristically Defendant Stone's counsel of record have not promptly responded to Dr. Corsi's and the undersigned counsel's request to consent to this filing.

Dated: February 27, 2019

Respectfully submitted,

/s/ Larry Klayman
Larry Klayman, Esq.

KLAYMAN LAW GROUP, P.A.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically and served through the court's ECF system to all counsel of record or parties on February 27, 2019

/s/ Larry Klayman
Larry Klayman, Esq.

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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UNITED STATES OF AMERICA,)	
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Plaintiff,)	
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v.)	Case No.: 1:19-CR-00018-ABJ
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ROGER J. STONE, JR.,)	
)	
Defendant.)	
_____)	

SWORN DECLARATION OF DR. JEROME CORSI

I, Dr. Jerome Corsi, being duly sworn deposes and says, being over eighteen years of age, hereby declare based on my personal information and belief as follows:

1. I am a material witness in the on-going criminal prosecution of Roger Stone, having been listed as Person 1 in the indictment brought by Special Counsel Robert Mueller.

2. Previously, I filed a motion for leave to file an amicus brief, which was accepted as filed by this court on February 12, 2019. *See Exhibit 1* incorporated herein by reference.

3. The reason for this amicus brief is that defendant Roger Stone has, along with his surrogates, engaged in a campaign to intimidate, coerce, and threaten not just me but my legal counsel Larry Klayman. Defendant Stone has engaged in this campaign not just directly but also through surrogates, such as Alex Jones, and others at InfoWars, where he was a host on the show “Stone Cold Truth”, and through other persons. This caused me to have to file a civil complaint against Defendant Stone, which was initially assigned to this Court as related but was reassigned to the Honorable Timothy Kelly. Mr. Klayman, my lawyer, has also been compelled to file a civil complaint against Mr. Stone. *See Exhibits 2 and 3*, attached to this declaration.

4. On February 19, 2019, this Court entered a so called gag order against Defendant Stone for effectively also threatening and attempting to incite violence against it by posting on Instagram a doctored photo of the Honorable Amy Berman Jackson with a crosshairs and firearm next to her head. In warning Defendant Stone not to persist with these threats and other misconduct, as this could result if it happened again in the revocation of his bail and subsequent incarceration, the Court imposed this total gag order. It found:

the conditions of defendant's pretrial release are hereby modified to include the condition that, and the February 15, 2019 media communications order is hereby modified to provide that, the defendant is prohibited from making statements to the media or in public settings about the Special Counsel's investigation or this case or any of the participants in the investigation or the case. The prohibition includes, but is not limited to, statements made about the case through the following means: radio broadcasts; interviews on television, on the radio, with print reporters, or on internet based media; press releases or press conferences; blogs or letters to the editor; and posts on Facebook, Twitter, Instagram, or any other form of social media. Furthermore, the defendant may not comment publicly about the case indirectly by having statements made publicly on his behalf by surrogates, family members, spokespersons, representatives, or volunteers. *See Exhibit 4 Gag Order.*

5. I am aware that Defendant Stone, who I had worked with in the past, often brags about his connections to the Mafia, as set forth in my amicus brief and civil complaint. Exhibits 1 and 2.

6. Thus, I have more than reason to believe that Defendant Stone has, through these or other means, continued to harass and threaten me and my family to try to intimidate and coerce me not to tell the truth if I am called by the Special Counsel at his criminal trial.

7. On Sunday, Monday, and Tuesday this week, Feb. 24-26, 2019, persons in blue Lincoln Zephyr (License Plate: New Jersey F27*KZR) and a white Dodge Caravan (License Plate: New Jersey H52*KDC) in front of my house in New Jersey and the dwelling of my stepson in New Jersey. They both lingered there for no apparent reason as if they were watching

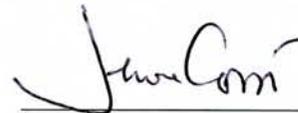
us and threatening us. When we detected them, we got in our vehicles to approach the two vehicles apparently engaged in surveillance. Upon seeing us approach them, both vehicles repeatedly left their surveillance position and attempted to evade us. We were unable to speak to the persons in the Dodge Caravan, but the male wearing a "hoodie" pullover sweatshirt told us he was making test calls for Sprint, although he failed to produce any identification proving he was a Sprint employee. Today, Wednesday, Feb. 27, 2019, we tracked a black Chevrolet Suburban (License Plate: New Jersey VUT-83M). We notified local law enforcement, providing the identification and license plates of all three vehicles. (See attached photos as Exhibit 5).

8. In addition, I have been informed by my attorney Mr. Klayman that Defendant Stone is working with one of his surrogates to try to further intimidate and harm him. This person is a convicted felon by the name of Peter T. Santilli. Mr. Klayman has been forced to file suit against Santilli but the coercion and threats continue. It is illegal to threaten the attorney of a witness in a criminal proceeding. *See* 18 U.S.C. § 1512

For these reasons, I ask this Court respectfully issue an order to show cause and to set an evidentiary hearing in order that Defendant Stone can be questioned about these and other on-going actions to intimidate, coerce and threaten me and my legal counsel, which would violate Court's order of February 15, 2019. Exhibit 4. I am concerned for my safety and the safety of my family, in addition to the safety of my attorney.

Sworn under penalty of perjury this 27 day of February 2019.

Further affiant sayeth not



Dr. Jerome Corsi

Notary Public:



JOSEPHINE POLITI
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 15, 2021
JOSEPHINE POLITI
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 15, 2021