

LINDSEY O. GRAHAM, SOUTH CAROLINA  
JOHN CORNYN, TEXAS  
MICHAEL S. LEE, UTAH  
TED CRUZ, TEXAS  
JOSH HAWLEY, MISSOURI  
THOM TILLIS, NORTH CAROLINA  
JOHN KENNEDY, LOUISIANA  
MARSHA BLACKBURN, TENNESSEE  
ERIC SCHMITT, MISSOURI  
KATIE BOYD BRITT, ALABAMA  
ASHLEY MOODY, FLORIDA

RICHARD J. DURBIN, ILLINOIS  
SHELDON WHITEHOUSE, RHODE ISLAND  
AMY KLOBUCHAR, MINNESOTA  
CHRISTOPHER A. COONS, DELAWARE  
RICHARD BLUMENTHAL, CONNECTICUT  
MAZIE HIRONO, HAWAII  
CORY A. BOOKER, NEW JERSEY  
ALEX PADILLA, CALIFORNIA  
PETER WELCH, VERMONT  
ADAM B. SCHIFF, CALIFORNIA

## United States Senate

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

June 2, 2025

### VIA ELECTRONIC TRANSMISSION

The Honorable Kash Patel  
Director  
Federal Bureau of Investigation

Dear Director Patel:

On March 1, 2023, August 24, 2023, October 11, 2023, and January 31, 2024, I wrote your predecessor, former Director Christopher Wray, seeking answers about the anti-Catholic “Domain Perspective” memo prepared by analysts in the FBI’s Richmond, Virginia field office. These letters focused on the preparation of the memo, its dissemination, the use of biased sources such as the radical Southern Poverty Law Center (SPLC), and later, the FBI’s misleading representations to Congress, including those of former Director Wray. The FBI under Director Wray consistently failed to provide full responses to these requests.

The FBI’s productions confirm concerns I raised in my first letter on the topic, on March 1, 2023, shortly after the memo was revealed to the public.<sup>1</sup> In that letter, I asked Director Wray and Attorney General Garland to reveal the true breadth of the memo’s distribution, before it was revealed publicly by a whistleblower. It turns out, even before that disclosure, the memo had been widely distributed to FBI field offices across the country, as the following bullet point from the production shows:<sup>2</sup>

- (U//FOUO) 19 Intelligence Analysts from 13 field offices, including CTAS and DTOS; 5 agents and 2 TFOs from 3 field offices; and 3 SIAs from 3 different field offices (not including RH SIAs), viewed the product in Sentinel from the date the product was released on 1/24/2023 through the day prior to the document being leaked. The product

was also disseminated in the FEESUM email distro to more than 1000 individuals in the FBI on 2 February 2023. No one contacted FBI RH with concerns, suggestions, or negative feedback related to the product. FBI RH only received positive input indicating the importance of further outreach and external dissemination of the intelligence to mitigate the threat posed by RMVEs.

Likewise, one email exchange shows the FBI’s Buffalo, New York field office discussing the Richmond memo before its disclosure, expressing concern that, “[t]wo of the 9 [“RTC Hate Groups” identified by the Southern Poverty Law Center and included in the Richmond Domain perspective] are located in the Buffalo [area of responsibility] (Buffalo and Niagara Falls).”<sup>3</sup> This raises serious concerns that FBI field offices may

---

<sup>1</sup> The FBI’s productions were received in increments starting in March 2025; Letter from Sen. Charles E. Grassley to FBI Director Christopher Wray and Attorney General Merrick Garland (March 1, 2023),

[https://www.grassley.senate.gov/imo/media/doc/grassley\\_graham\\_to\\_doj\\_fbi\\_richmond\\_fbi\\_catholic\\_report.pdf](https://www.grassley.senate.gov/imo/media/doc/grassley_graham_to_doj_fbi_richmond_fbi_catholic_report.pdf).

<sup>2</sup> FBI Production, Bates # FBI-SJC119-DP-000637-000639.

<sup>3</sup> FBI Production, Bates # FBI-SJC119-DP-000438-000439 (yellow highlight included in the original provided to the committee); see also Richmond Domain Perspective, *Interest of Racially or Ethnically Motivated Violent Extremists in Radical-Traditionalist Catholic Ideology Almost Certainly Presents New Mitigation Opportunities* (Jan. 23, 2023) (which lists nine “Southern Poverty Law Center-Defined RTC Hate Groups in the United States,” including one Niagara Falls and another in Buffalo, New York).

have relied on the Richmond memo, and placed groups in their areas of responsibility under suspicion based on reporting from the deeply-biased sources used in the memo.

From: [REDACTED] (BF) (FBI) [REDACTED] >  
Sent: Thursday, February 2, 2023 1:48 PM  
To: [REDACTED] (BF) (FBI) [REDACTED] (BF) (FBI)  
[REDACTED] (BF) (FBI) [REDACTED] (BF) (FBI)  
Cc: [REDACTED] (BF) (FBI) [REDACTED] (BF) (FBI) [REDACTED] (BF) (FBI)  
[REDACTED] (BF) (FBI) [REDACTED] (BF) (FBI) [REDACTED] (BF) (FBI)  
Subject: (U//FOUO) Interest of Racially or Ethnically Motivated Violent Extremists in Radical-Traditionalist Catholic Ideology Almost Certainly Presents New Mitigation Opportunities --- UNCLASSIFIED//FOUO  
  
Classification: UNCLASSIFIED//FOUO  
=====

ALL

Please check out the Domain product from Richmond on the DT threat. Appendix D lists 9 identified Hate groups. Two of the 9 are located in the Buffalo AOR (Buffalo and Niagara Falls).

In my March 2023 letter, I also asked the FBI to identify other products that linked primarily-religious or conservative groups with violent extremism and other FBI reports that cited the SPLC.<sup>4</sup> The FBI, under your predecessor, failed to answer that question too.<sup>5</sup> These documents reveal the same day the Richmond memo was made public, the FBI searched to determine how many FBI products used similar terminology. It determined at least “13 documents and 5 attachments” used the terminology “radical traditionalist Catholic.”<sup>6</sup> The production also shows these reports also relied, in part, on the thoroughly-discredited and biased SPLC as a source. I request the production of the referenced “13 documents and 5 attachments,” as well as all other reports that purport to tie religious groups to violent extremism based on SPLC and other biased sources.

The fact that other FBI products used similar terms as the Richmond memo shows FBI had the answer to at least some of my questions as soon as the memo was made public. The FBI under Director Wray obstructed my investigation by not providing these answers for many months. Congress needs to know who participated in this obstruction and why the FBI obstructed an inquiry into a memo it had already repudiated.

For example, in an email sent on February 9, 2023, by Tonya Ugoretz, Assistant Director, FBI Directorate of Intelligence, provided a tentative analysis of the Richmond Domain Perspective’s failure to comply with the FBI’s analytical tradecraft standards, the day after the memo’s disclosure.<sup>7</sup>

That was followed by a February 21, 2023, final analysis from the Directorate of Intelligence outlining the memo’s failure to follow the tradecraft standards ordered by the Director of National Intelligence (DNI).<sup>8</sup> The FBI’s analytical tradecraft analysis wasn’t provided to the Senate until the FBI’s briefing to staff on

<sup>4</sup> Sen. Grassley, March 1, 2023 letter to DOJ and FBI, *supra* n. 1.

<sup>5</sup> Staff for Senator Grassley at a September 2023 briefing asked the FBI if it had made a search for other similar products to the Richmond memo, to which the FBI responded it had not. Notes of FBI briefing to Senate Staff, dated September 21, 2023, on file with committee staff.

<sup>6</sup> FBI Production, Bates # FBI-SJC119-DP-000491 to FBI-SJC119-DP-000492, attached as exhibit A.

<sup>7</sup> FBI Production, Bates # FBI-SJC119-DP-000490, attached in exhibit A.

<sup>8</sup> FBI Production, Bates # FBI-SJC119-DP-000493-000500, attached as exhibit B.

September 21, 2023, seven-and-a-half months after Ms. Ugoretz's email, and seven months after the FBI's analysis.<sup>9</sup>

This September 2023 briefing was also more than five months after the FBI finalized its internal Inspection Division (INSD) report. That report was dated April 17, 2023 and April 21, 2023, the first date being the day before the FBI answered my March 1, 2023, letter without providing the report.<sup>10</sup>

## (U) STRATEGIC REVIEW REPORT

(U) Richmond Field Office - Domain Perspective Strategic Review

(U) 04/17/2023 04/21/2023

If the report was finalized on April 17, that's *before* the FBI's response, which claimed the FBI's internal review was "ongoing" and refused on that basis to answer my questions.<sup>11</sup> This deception was echoed by Director Wray in testimony before the House Judiciary Committee in July 2023, where he repeatedly evaded questions by claiming the internal review hadn't been completed even though by then it most assuredly was:<sup>12</sup>

Mr. WRAY. We are working on finishing an internal review into what happen there.

Mr. WRAY. When we finish our internal review, which will be very soon, we will come back before the Committee and provide a briefing on what we found. Then we can—

Mr. WRAY. Well again, I think that's what our internal review will find, and I'd rather wait until I hear what the results of that internal review are.

Mr. WRAY. I expect us to be able to brief the Committee on our internal review later this summer.

Mr. WRAY. I'm not sure yet what it will include because it's not done yet, but when it is, we'll provide you with an appropriate briefing.<sup>13</sup>

Apparently, the Biden FBI thought that when it responded to me in April 2023 Congress wouldn't later direct it to provide this final internal report.<sup>14</sup> I request that you further search FBI records, to include the FBI's Office of General Counsel and leadership, for all discussions about the FBI's response to my inquiry and those

<sup>9</sup> Notes of September 21, 2023, FBI briefing to Senate staff on file with staff.

<sup>10</sup> Inspection Division, Fed. Bur. of Investigation, *Strategic Review Report, Richmond Field Office – Domain Perspective Strategic Review* (Apr. 17, 2023, Apr. 21, 2023), Bates # FBI-SJC118-DP-000001-000019.

<sup>11</sup> Letter from Christopher Dunham, Acting Assistant Director, Office of Congressional Affairs, Fed. Bur. of Investigation (April 18, 2023), <https://www.grassley.senate.gov/download/fbi-to-grassley-graham-richmond-fbi-catholic-report>.

<sup>12</sup> The April 2023 INSD report notes that, "[i]n parallel [to the INSD investigation], the DI reviewed the DP for adherence to Analytical Tradecraft standards, while CTD reviewed the assessment and terminology used in the DP." The DI report on analytical tradecraft standards was issued in Feb. 2023, and the INSD reported the conclusions of the CTD's analysis. All components had therefore already reported.

<sup>13</sup> Transcript, U.S. House of Rep, Comm. on the Judiciary, Hearing, *Oversight of the Fed. Bur. of Investigation* (July 12, 2023), <https://www.govinfo.gov/app/details/CHRG-118hhrg52977/CHRG-118hhrg52977>.

<sup>14</sup> Intelligence Authorization Act for FY 2024, Cong. Rec. S5990-S5991 (Dec. 14, 2023), <https://intelligence.senate.gov/sites/default/files/publications/IAA%20FY24%20JES%20-%20Cong.%20Rec.%20S5990%20-%202012.14.23.pdf>.

of other members of Congress. This includes why the FBI repeatedly claimed its investigation was ongoing after its Inspection Division investigation had completed. I'm determined to get to the bottom of the Richmond memo, and of the FBI's contempt for oversight in the last administration.

My investigation has also focused on Director Wray's misleading testimony on the scope of the memo's distribution to other FBI field offices when he testified it was "a single product by a single field office."<sup>15</sup> I've since learned other field offices provided input into the memo's production. This was highly material information that Director Wray should have revealed. I and other members had already expressed concern as to whether the memo's production was isolated to Richmond or part of a larger problem.<sup>16</sup> Testimony calling it the work of a single field office was misleading at best, and appears to be part of a pattern of intentional deception.

The FBI's recent production shows the FBI analysts in Richmond also consulted with the Louisville, Portland, and Milwaukee field offices as they prepared the Richmond memo.<sup>17</sup> This included gathering information about Catholic traditionalist groups from the Louisville Field Office. That information appears to have informed a slide presentation at least one of the Richmond analysts produced referencing RTCs' supposed "core concepts," including "[c]onservative family values/roles" and finding "radical-traditional Catholicism's" beliefs were, "[c]omparable to Islamist ideology."<sup>18</sup> In addition, the email exchanges with the Portland and Milwaukee FBI field offices as the Richmond memo was being prepared clearly didn't just ask them to confirm, "two sentences or something thereabouts" related to their own cases, as Director Wray claimed in response to my questioning.<sup>19</sup> As the FBI's recent productions reveal, the exchange between the Richmond analysts and the Portland and Milwaukee field offices included phone conversations about the memo, as this produced email from one of the authoring Richmond analysts demonstrates:<sup>20</sup>

From: [REDACTED] (RH) (FBI) [REDACTED]  
Sent: Thursday, February 09, 2023 11:30 AM  
To: [REDACTED] (RH) (FBI) [REDACTED]  
Subject: RE: --- UNCLASSIFIED

Classification: UNCLASSIFIED

On 1/3/23- I coordinated with FBI PD and also spoke with them on the phone during this timeframe to receive concurrence to use information on their subject. I did not provide them with the full product, rather I gave them context for their subject.

On 1/11/23- I provided the MW-related bullet from the DP to the following individuals from FB MW for the concurrence. I did not provide the entire DP. Sometime during that same time frame, I spoke with [REDACTED] about the overall product, our investigation, and their subject.

<sup>15</sup> House Judiciary Committee, Hearing on *Oversight of the Federal Bureau of Investigation* (July 12, 2023), <https://judiciary.house.gov/committee-activity/hearings/oversight-federal-bureau-investigation-0>.

<sup>16</sup> See, e.g., March 1, 2023, letter from Sen. Grassley and Sen. Graham to Attorney General Garland and Director Wray, *supra* n. 1 (asking whether the Richmond memo was disseminated outside the Richmond field office, and if so, to whom and for what reason).

<sup>17</sup> FBI Production, Bates # FBI-SJC119-DP-000614 to FBI-SJC119-DP-000619.

<sup>18</sup> FBI Production, Bates #FBI-SJC119-DP-000389 - 000405.

<sup>19</sup> U.S. Senate Comm. on the Judiciary, *Hearing on Oversight of the Fed. Bur. of Investigation* (Dec. 5, 2023), <https://www.judiciary.senate.gov/committee-activity/hearings/12/05/2023/oversight-of-the-federal-bureau-of-investigation>.

<sup>20</sup> See, e.g., FBI Production, Bates # FBI-SJC119-DP-000430.

The Milwaukee office was notified the Richmond analysts were preparing an, “Intelligence Note related to the interest of RMVEs [racially-motivated violent extremists] in Radical-Traditionalist Catholic Ideology” and that the analyst was “doing some queries to look into other RMVE subjects who adhere to rad-trad ideology.” The Richmond analyst wanted to “pick [the Milwaukee analyst’s] brain further.”<sup>21</sup> The memo was published to a share drive used by the Milwaukee Field Office, and FBI officials there and in the Phoenix, Arizona field office expressed concern about the use of the SPLC as a source.<sup>22</sup> It’s unclear whether this criticism ever made its way back to Richmond, but it does show the memo was shared with FBI Milwaukee and other field offices.

From: [REDACTED]  
Subject: RE: Interesting ... --- UNCLASSIFIED//FOUO  
To: [REDACTED]  
Sent: February 2, 2023 4:06 PM (UTC-05:00)

Classification: UNCLASSIFIED//FOUO  
=====

Transitory

And yeah, our overreliance on the SPLC for hate designations is ... problematic

V/R

IA [REDACTED]  
FBI Milwaukee, Squad [REDACTED]  
[REDACTED] desk  
[REDACTED] mobile  
@fbi.gov UNCLASSIFIED  
@fbi [REDACTED] SIPRNET

The Daily Readings [REDACTED] SUM are on SharePoint site: [https://adhoc.\[REDACTED\]](https://adhoc.[REDACTED]). If you want to be on the daily email distro on red/green side let me know. The Daily Readings [REDACTED] SUM includes the latest updates to the site for CI, Cyber, CT, Technology, and Criminal readings.

From: [REDACTED] (PX) (FBI) [REDACTED] @fbi [REDACTED]  
Sent: Thursday, February 02, 2023 3:04 PM  
To: [REDACTED] (MW) (FBI) [REDACTED] @fbi [REDACTED]  
Subject: RE: Interesting ... --- UNCLASSIFIED//FOUO

Classification: UNCLASSIFIED//FOUO  
=====

Transitory

Uhhmmm, that is interesting, several thoughts, but mostly, who is the customer. Is anyone really asking for a product like this? Apparently we are at the behest of the SPLC...  
RTC

On December 5, 2023, I questioned Director Wray about his misleading testimony:

Senator Grassley: You testified before the Senate Intelligence Committee that the Richmond field office anti-Catholic memo was ‘a product by one field office.’ You testified before the House Judiciary Committee that the memo was ‘a single product [by] a single field office.’ But the Richmond memo says two other field offices of the FBI were involved and that that information had been redacted in versions provided to the Congress. Why did the FBI redact that critical information, and second, did you review the unredacted version before giving your previous testimony?

<sup>21</sup> FBI Production, Bates # FBI-SJC119-DP-000143.

<sup>22</sup> FBI Production, Bates # FBI-SJC119-DP-00248-000252.



Director Wray: So, Senator, I think that this notion that other field offices were involved is a garble, and let me explain why I say that. The only involvement of the two other field offices was the Richmond authors of the product included two sentences or something thereabouts referencing each of these other offices' cases, and they sent those sentences about the other offices' cases to them, not the whole product, and asked them, 'hey, did we describe your case right?' That's all the other offices had. So it was a single field office's product, and I stand by that.

Senator Grassley: Did you review the unredacted memo before giving your previous testimony?

Director Wray: I have reviewed the unredacted memo. Exactly when I reviewed it, I can't as I sit here right now tell you.<sup>23</sup>

This shows once again the need for FBI to produce all records related to the FBI's response to Congress in the wake of the memo's release, including the timing of Director Wray's review of the Richmond memo.

Director Wray's testimony was inaccurate not only because it failed to reveal the scope of the memo's production and dissemination, but also because it failed to reveal the existence of a second, draft product on the same topic intended for external distribution to the whole FBI.<sup>24</sup> That draft product was intended for distribution as a Strategic Perspective Executive Analytic Report (SPEAR). It was clearly a separate product, since it involved a different planned distribution to the whole Bureau, and a different chain of review, through the Counterterrorism Division. It also contained different content from the internal Domain Perspective, notably deleting references to the Southern Poverty Law Center.<sup>25</sup> Nevertheless, this draft external memo repeated the unfounded link between traditional Catholicism and violent extremism that was present in the internal Domain Perspective. It concluded that, "RMVE [racially and ethnically-motivated violent extremism] in RTCs ["radical-traditional Catholicism"] is likely to increase . . . ." This shows once again that Director Wray's claim the Richmond analysts produced a "single product" was false.

The FBI's production also raises additional concerns about the deletion of files related to the memo that was ordered by then-FBI-Deputy-Director Paul Abbate. Deputy Director Abbate ordered "a permanent removal of the memorandum, as well as any edits or references, from all FBI systems," telling the Special Agent in Charge of the Richmond Field Office to "pull it down," the same day the memo was made public.<sup>26</sup> This led to the reported permanent loss of records related to the production of the memo.<sup>27</sup> While the FBI last year told my staff they believed they could recover deleted files, no such files were ever produced.<sup>28</sup> The FBI's claim that it could recover the deleted information contradicts the FBI's own INSD report on the memo's preparation. The INSD report noted with respect to internal feedback within the Richmond Field Office that it, "couldn't determine whether certain feedback was provided on the memo, because 'all references to the [Domain Perspective] were removed from the Intelligence Share Point side.'"<sup>29</sup> The FBI's recent productions show the

<sup>23</sup> Director Wray Testimony before the Senate Judiciary Committee *supra* n. 19.

<sup>24</sup> FBI Production, Bates # FBI-SJC110-DP-000183 - 000185, attached in exhibit C.

<sup>25</sup> FBI Production, Bates # FBI-SJC119-DP-000182-000186.

<sup>26</sup> Interim Staff Report, U.S. House of Representatives, Comm. on the Judiciary, *The FBI's Breach of Religious Freedom: The Weaponization of Law Enforcement Against Catholic Americans* (Dec. 4, 2023) at 19, <https://judiciary.house.gov/sites/evo-subsites/republicans-judiciary.house.gov/files/evo-media-document/2023-12-04-the-fbis-breach-of-religious-freedom-the-weaponization-of-law-enforcement-against-catholic-americans.pdf>. In Senator Grassley's interactions with the FBI on this topic, it has not disputed Deputy Director Abbate issued this deletion order.

<sup>27</sup> *Id.*

<sup>28</sup> Notes of August 27, 2024, phone conversation with Ms. Katherine Gulotta, FBI Liaison to the Senate Judiciary Comm., on file with staff.

<sup>29</sup> See FBI Strategic Review Report at 8. If the information could have been recovered, surely the Inspection Division would have done so.

FBI's Operational Technology Division (OTD), two days after the memo's public release, on February 10, 2023, notified the Richmond Field Office that an FBI official, whose identity is redacted, similarly ordered OTD to "pull down" an Excel document showing the list of "users who have accessed the Domain Perspective Intel product across our relevant case files."<sup>30</sup>

From: [REDACTED] (OTD) (FBI)  
Sent: Friday, February 10, 2023 3:49 PM  
To: [REDACTED] (RH) (FBI) >  
Cc: [REDACTED] (RH) (FBI) />  
Subject: Serial Access List - 266N-RH-[REDACTED] serial 10 --- UNCLASSIFIED

Classification: UNCLASSIFIED

-----  
Transitory

[REDACTED]  
[REDACTED] stopped by this afternoon and explained that we need to work to pull down the excel formatted report of users who have accessed the Domain Perspective Intel product across our relevant case files. For Squad [REDACTED], I believe this applies to 266N-RH-[REDACTED] (which is the Lopez file), and more specifically serial 10 within the INTELPRODS subfile.

The FBI must immediately remove the redaction over the name of the FBI official and search for additional documentation of all instructions to delete files related to the incident, as well as the reason for those deletions, whether they were intended to deny information to Congress or internal investigators, and whether any of the deleted files have been or can be recovered.

I continue to investigate Richmond memo and the culture at the FBI that allowed it to be produced and approved. I look forward to continuing to work with you to restore the FBI to excellence and prove once again that justice can and must be fairly and evenly administered, blind to whether we are Democrats or Republicans, believers or nonbelievers. If you have any questions about this request, please reach out to James Layne on my Committee staff at (202) 224-5225.

Sincerely,



Charles E. Grassley  
Chairman  
Committee on the Judiciary

<sup>30</sup> FBI Production, Bates # FBI-SJC119-DP-000440-000441.

# Exhibit A



**Meador, Stanley M. (RH) (FBI)**

---

**From:** Ugoretz, Tonya L. (DI) (FBI)  
**Sent:** Thursday, February 09, 2023 7:40 AM  
**To:** [REDACTED] (CTD) (FBI); Coakley, Miriam M. (OGC) (FBI); [REDACTED] (RH) (FBI); Meador, Stanley M. (RH) (FBI); Wells, Robert R. (CTD) (FBI); Jones, Jason Allen (OGC) (FBI); Turner, Suzanne (INSD) (FBI); Dunham, Christopher G. (OCA) (FBI); [REDACTED] (OCA) (FBI); [REDACTED] (CTD) (FBI); [REDACTED] (DI) (FBI); Milhoan, Catherine L. (OPA) (FBI); Goodwater, Douglas M. (OPA) (FBI); [REDACTED] (OPA) (FBI); [REDACTED] (OPA) (FBI); [REDACTED] (OPA) (FBI); [REDACTED] (OPA) (FBI); [REDACTED] (OGC) (FBI); [REDACTED] (OGC) (FBI); [REDACTED] (InTO) (FBI); Beidler, Douglas S. (SecD) (FBI); Platt, Lon Stuart (OPR) (FBI); Byron, Pamela (DI) (FBI); [REDACTED] (DI) (FBI); Hardiman, Kellie M. (CTD) (FBI); [REDACTED] (CTD) (FBI); [REDACTED] (CTD) (FBI); Decker, Eric L. (DI) (FBI)  
**Subject:** RE: Richmond Intel Product, referenced in news --- UNCLASSIFIED//FOUO

Classification: UNCLASSIFIED//FOUO  
=====

Good morning,

We understand there is discussion of recalling this Domain Perspective. DI conducted a preliminary review of the product's analytic tradecraft to help inform that decision, with the following key takeaways:

- **With respect to sourcing (in particular, SPLC):** SPLC has been a source for statistics and data not otherwise available to law enforcement. However, this product cites more subjective information from SPLC (a list of hate groups) without examining SPLC's threshold for determining a hate group or explanation of how that threshold aligns with the FBI's definition.
  - Tradecraft standards require describing the quality and credibility of underlying sources. This product's Source Summary Statement does not address factors that would affect the quality and credibility of SPLC as a source for subjective information, such as its previously issuing apologies and retracting its naming of individuals or groups as extremist.
  - In addition, since the hate group identified in this case was related to a branch of a religious group, there should have been more care to caveat this information.
- **Assumptions:** CTD notes below that this product "is the only finished intelligence product to specifically address RMVE's interest in radical-traditionalist catholic ideology of which we are aware." This product states RMVE interest in RTC ideology as a fact and proceeds from that assumption without substantiation. A more logical first product on this topic would have laid out the author's assessment of a connection between RTC ideology and violence or extremism so that assessment could have been appropriately reviewed.

We will share our fuller read with CTD and welcome any questions.

Thanks  
Tonya

**From:** [REDACTED] (CTD) (FBI) [REDACTED]  
**Sent:** Wednesday, February 08, 2023 6:03 PM  
**To:** Ugoretz, Tonya L. (DI) (FBI) [REDACTED]; Coakley, Miriam M. (OGC) (FBI) [REDACTED]; [REDACTED] (RH) (FBI) [REDACTED]; Meador, Stanley M. (RH)



(FBI) < [REDACTED] >; Wells, Robert R. (CTD) (FBI) < [REDACTED] >; Jones, Jason Allen (OGC) (FBI) < [REDACTED] >; Turner, Suzanne (INSD) (FBI) < [REDACTED] >; Dunham, Christopher G. (OCA) (FBI) < [REDACTED] >; [REDACTED] (OCA) (FBI) < [REDACTED] >; [REDACTED] (CTD) (FBI) < [REDACTED] >; [REDACTED] (DI) (FBI) < [REDACTED] >; Milhoan, Catherine L. (OPA) (FBI) < [REDACTED] >; Goodwater, Douglas M. (OPA) (FBI) < [REDACTED] >; [REDACTED] (OPA) (FBI) < [REDACTED] >; [REDACTED] (OPA) (FBI) < [REDACTED] >; [REDACTED] (OPA) (FBI) < [REDACTED] >; [REDACTED] (OGC) (FBI) < [REDACTED] >; [REDACTED] (OGC) (FBI) < [REDACTED] >; [REDACTED] (InTO) (FBI) < [REDACTED] >; Beidler, Douglas S. (SecD) (FBI) < [REDACTED] >; Platt, Lon Stuart (OPR) (FBI) < [REDACTED] >; Byron, Pamela (DI) (FBI) < [REDACTED] >; [REDACTED] (DI) (FBI) < [REDACTED] >; Hardiman, Kellie M. (CTD) (FBI) < [REDACTED] >; [REDACTED] (CTD) (FBI) < [REDACTED] >; [REDACTED] (CTD) (FBI) < [REDACTED] >

**Subject:** RE: Richmond Intel Product, referenced in news --- UNCLASSIFIED//FOUO

Classification: UNCLASSIFIED//FOUO

Transitory

Miriam:

Per our conversation this afternoon –

CTD's analysis of the racially or ethnically motivated violent extremist (RMVE) threat does not align with FBI Richmond's analysis. The FBI does not use the phrase "radical traditionalist catholic" to define any domestic terrorism threat category. Further, the FBI does not open investigations based upon first amendment protected activities, such as religion. The leaked internal-only intelligence product referenced in the article is the only finished intelligence product to specifically address RMVE's interest in radical-traditionalist catholic ideology of which we are aware. CTD does not assess there is a significant linkage between RMVE actors and this ideology which would necessitate further FBI interest, analysis, or intelligence collection efforts. FBI engagement with all communities of faith to provide educational materials on indicators of mobilization helps protect those communities by allowing them to recognize potential violent actors before violence occurs against their congregants or other members of the community. When describing ideologically-motivated violent extremists, such as RMVEs, the FBI focuses first and foremost on violence, criminal activity and violation of federal law. Political or religious affiliations (such as "far-right") are not used to describe or identify violent extremists. Some portions of the paper referenced in the article do not adhere to these FBI standards.

A query of Sentinel identified 13 documents and 5 attachments that included the term, "radical traditionalist catholic" or "Radical-Traditionalist Catholic":

1. *The leaked product.*

a. On 24 January 2023, FBI Richmond serialized the Domain Perspective titled, "Interest of Racially or Ethnically Motivated Violent Extremists in **Radical-Traditionalist Catholic** Ideology Almost Certainly Presents New Mitigation Opportunities" (266N-RH-[REDACTED]-INTELPRODS, Serial 68). The case file 266N-RH-[REDACTED]-INTELPRODS was opened on 17 May 2013 and is still open.

b. On 6 February 2023, FBI Tampa serialized a "CT Intel Monthly Roundup," which cited the FBI Richmond product (800A-TP-[REDACTED]-[REDACTED] Serial 77). The case file 800A-TP-[REDACTED] was opened on 24 May 2018 and is still open.

2. On 23 September 2022, the National Threat Operations Center serialized its weekly Domain Awareness tips, which included an attachment listing the tips; one of the tips cited the Southern Poverty Law Center (SPLC) website, <https://www.splcenter.org/fighting-hate/intelligence-report/2007/12-anti-semitic-radical-traditionalist-catholic-groups> (242-HQ-[REDACTED] DomainAwareness, Serial 57). The case file 242-HQ-[REDACTED]-DomainAwareness was opened on 15 October 2020 and is still open.



3. On 15 August 2018, FBI Boston opened a Guardian [REDACTED] (BS) based on an individual who called the FBI Public Access Line (PAL) and reported possible [REDACTED] e [REDACTED] identified a Southern Poverty Law Center article that described it as a "radical traditionalist catholic religious order." On 16 August 2018, FBI Boston converted the Guardian to a Type 1 Assessment (7A-BS-[REDACTED] (Closed)), which was closed on 15 November 2018.
4. On 7 March 2018, FBI Los Angeles serialized a FOIA release, which included a paragraph about "radical traditionalist Catholics," which was identified as coming from the Southern Poverty Law Center (SPLC) (100N-LA-[REDACTED], Serial 3759). The case file 100N-LA-[REDACTED] was opened on 12 January 2010 and closed on 6 August 2012.
5. On 15 August 2017, FBI Indianapolis serialized an "Indiana Open Source Bulletin," which cited the Southern Poverty Law Center (SPLC) as stating "radical traditional catholic" hate groups were operating in Indiana (818A-IP-[REDACTED], Serial 557). The case file 818A-IP-[REDACTED] was opened on 5 June 2011 and is still open.
6. On 6 July 2016, FBI Milwaukee serialized a Southern Poverty Law Center (SPLC) document titled, "The Year in Hate and Extremism," which included "radical traditional catholic" groups as hate groups (804I-MW-[REDACTED] Serial 2). The case file 804I-MW-[REDACTED] was opened on 30 June 2016 and is still open.
7. ATF report titled, "Northern Border Extremists, Overview of American/Canadian Extremists":
- On 27 May 2015, FBI Boston serialized a copy of a Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) report titled, "Northern Border Extremists, Overview of American/Canadian Extremists," dated 1 December 2008, which cites hate groups identified by the Southern Poverty Law Center (SPLC), including "radical traditional catholic" groups (62F-BS-[REDACTED], Serial 150). The case file 62F-BS-[REDACTED] was opened on 15 May 2002 and is still open.
  - On 26 February 2016, FBI San Francisco serialized a Guardian [REDACTED] (SF), and attached documents titled, "U ATT\_18.pdf" and "U ATT\_20.pdf," which included copies of a Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) report titled, "Northern Border Extremists, Overview of American/Canadian Extremists," dated 1 December 2008, which cites hate groups identified by the Southern Poverty Law Center (SPLC), including "radical traditional catholic" groups (415-SF-[REDACTED] Serial 8526). The case file 415-SF-[REDACTED] was opened on 13 January 2009 and is still open.
8. On 24 June 2014, FBI Minneapolis serialized a document citing open source research on the Southern Poverty Law Center (SPLC), and the document stated the SPLC maintained a list of hate groups, which included "radical traditionalist catholic" groups (266N-MP-[REDACTED] Serial 5). The case file 266N-MP-[REDACTED] was opened on 24 June 2014 and closed on 19 May 2019.
9. The RESTRICTED case file 804B-HQ-[REDACTED] is marked as a sensitive investigative matter (SIM) involving: Domestic Public Official; Domestic Political Candidate; and Domestic Political Organization or an Individual Prominent in Such an Organization. The case file was opened on 3 March 2006 and closed on 25 September 2018. The following documents in the case file cite the phrase "radical traditionalist catholic":
- On 31 January 2011, a restricted document citing the phrase "radical traditionalist catholic" was filed to 804B-HQ-[REDACTED]. The serial and case file are restricted.
  - On 8 September 2010, a restricted document citing the phrase "radical traditionalist catholic" was filed to 804B-HQ-[REDACTED].
10. On 9 July 2009, FBI Indianapolis serialized a Domestic Terrorism Domain Threat Assessment, which cited the Southern Poverty Law Center as identifying 16 "hate groups" active in their domain, to include two "radical traditionalist catholic" groups (801H-IP-[REDACTED], Serial 8).
11. On 16 April 2009, FBI Buffalo serialized an intelligence assessment to provide baseline information on the threat and scope of civil rights in Buffalo (804B-BF-[REDACTED] Serial 346; and 62F-BF-[REDACTED] Serial 89). The document states, "The Southern Poverty Law Center (SPLC) identified four active hate groups within the Buffalo jurisdiction and classified them as black separatist, white nationalist, radical traditionalist catholic and general hate groups." The case file 804B-BF-[REDACTED] was opened on 5 October 2005 and closed on 28 February 2018. The case file 62F-BF-[REDACTED] was opened on 22 December 2006 and is still open.

CTD defers to DI for any further comment/action/assessment.

# Exhibit B





UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

# DIRECTORATE OF INTELLIGENCE

FEBRUARY 21, 2023

## Analytic Tradecraft Review Richmond Domain Perspective

- **(U//LES) Readability:** Incorporation of Analytic Tradecraft Standards (ATS) throughout the product would have led to a substantive, defensible product. Not enough questions were asked about assumptions, biases, and alternatives before the product was approved. Additionally, at times it was difficult to determine if a sentence was the author's opinion/analysis, facts, context, or background. In addition, despite numerous footnotes providing explanations, it was not clear, if all SSPX Churches referenced in the evidence are considered RTCs or if all RTCs have the same ideology or practices. **[ATS 3: Properly distinguishing between underlying intelligence information and analyst's assumptions and judgments; ATS 6: Clear and logical argumentation]**
- **(U//LES) Main Assessment:** The product incorporates the "floating likelihood" concept. In FY2023, many of our products opened up the possibility of placing the likelihood anywhere in the assessment, to include before the "so what." Domain Perspectives have allowed this for longer. The consequence to this, seen here, is RMVE interest in RTC ideology is stated as a fact by the FBI, and how we mitigate that fact is the assessment. Since the assessment of RMVE interest is not fleshed out, the paper reads (has the implication) RMVE ideology and RTC ideology align. The fact footnote "a" almost explicitly states that RTC ideology is violent and extremist without offering any evidence to support their ideology being violent. There is also a lack of support to demonstrate there has been an "increasingly observed interest" of RMVEs in RTC. The authors have not established a baseline to show an increase in interest. They only include three evidence bullets discussing three individuals (one is deceased). If they have it, the authors could have provided more evidence to show the interest has been increasing. Although they provide some details in the Perspective, it is not enough to establish what the baseline was before the "increase". An Assessment on RMVE's interest, would ideally have led to analysis establishing a clearer, scoped expression of RMVE interest in the RTC (i.e. taking advantage of it as a recruitment platform), rather than implying their violent alignment with RMVEs. **[ATS 6: Clear and logical argumentation]**
- **(U//LES) Sourcing:** The source descriptors were not consistent throughout the product (confidence statement, SSS, in-text, endnotes). There are vague descriptors in the confidence statement and more specific ones in-text. Most of the evidence bullets appear to be missing some in-text descriptors. In addition, they rely on open source information but do not provide any details regarding any potential bias/credibility of the sources, including concerning SPLC. Per ICD 203 6.d, analysis should be informed from all relevant information available. Like ADL, SPLC is an important resource for the FBI because it centrally locates hate crime information and data the FBI might not otherwise be privy to because it does not meet federal reporting standards, we didn't receive reports via our law enforcement and private sector liaison, or because victims of hate crimes might not be comfortable reporting information to law enforcement. However, this is where the importance of tradecraft becomes essential, and not purely academic. Per ATS 1, we should be describing the quality and credibility of underlying sources. The SPLC has a history of having to issue apologies and retract groups and individuals they have identified as being extremist or hate groups. The

UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE



source summary statement does not address these factors that would affect the quality and credibility of the sourcing. Here is an example of another SSS that attempts to address the SPLC's credibility related to RMVE groups: "The open source reporting provided corroboration to this assessment; further, the open source articles published by ABC News, NBC News, CNN, the Daily Beast, and The Texas Tribune indicate no known partialities; however, Southern Poverty Law Center, Center for Countering Digital Hate, and Human Rights Campaign could have potential partialities, although they indicated thorough research in their reporting." Since this was reporting on a religious branch of Catholicism that SPLC identified as a hate group, there should have been extra care to caveat the information, which was more subjective than statistical, and examine SPLC's threshold for determining a hate group and explain how it aligns or differs from the FBI's definition. [ATS 1: Properly describes quality and credibility of underlying sources]

- **(U//LES) Assumptions:** There are some unstated key assumptions that should have been included. For example, a major assumption that should have been stated is the FBI assumes RTCs will not internally mitigate the threat by reporting RMVEs to LE or removing them from congregations/organizations. In addition, aren't we assuming the RMVEs are attending these churches because of ideological reasons and not simply to participate in a more traditional Catholic mass or practice Catholicism? [ATS 3: Properly distinguishing between underlying intelligence information and analyst's assumptions and judgments]
- **(U//LES) Perspective:** While they provide information from open source in the Perspective detailing alleged connections between far-right Catholics/RTCs and other groups, there is no information in the Perspective regarding FBI investigations showing a growing overlap despite stating there was. The Perspective would be the place they could establish the baseline if the assessment is about an "increasingly observed interest" in RTC.
- **(U//LES) Analysis of Alternatives (AoA):** Because this product is assessing mitigation opportunities, there was no need for an AoA. However, if it would have assessed RMVE's interest, the evidence should have prompted an alternative interpretation. [ATS 4: Incorporate AoA]
- **(U//LES) Outlook:** Because RTC was conflated with RMVE ideology, the Outlook indicates we should liaison with traditionalists, but not RTCs. While worded carefully to ensure our source recruitment focus is on RMVEs, examining assumptions, biases, and alternatives perhaps would have affected how the Outlook was written to include establishing tripwires with RTC organizations should our assumption they wouldn't internally mitigate the threat be incorrect. In addition, it was not clear how the main Outlook assessment differed from the main assessment as they both assessed an "increase". The Outlook seemed to focus more on the RTCs instead of the RMVEs. The intent of some sentences in the Outlook was not clear. [ATS 5: Customer relevance; ATS 6: Clear and logical argumentation]





## INTELLIGENCE COMMUNITY DIRECTIVE 203

### Analytic Standards

**A. AUTHORITY:** The National Security Act of 1947, as amended; the Intelligence Reform and Terrorism Prevention Act of 2004; Executive Order 12333, as amended; Presidential Policy Directive/PPD-28; and other applicable provisions of law.

#### **B. PURPOSE**

1. This Intelligence Community Directive (ICD) establishes the Intelligence Community (IC) Analytic Standards that govern the production and evaluation of analytic products; articulates the responsibility of intelligence analysts to strive for excellence, integrity, and rigor in their analytic thinking and work practices; and delineates the role of the Office of the Director of National Intelligence (ODNI) Analytic Ombuds.

2. This Directive supersedes ICD 203, *Analytic Standards*, dated 21 June 2007, and rescinds ICPM 2006-200-2, *Role of the Office of the Director of National Intelligence Analytic Ombudsman*.

#### **C. APPLICABILITY**

1. This ICD applies to the IC, as defined by the National Security Act of 1947, as amended; and to such elements of any other department or agency as may be designated an element of the IC by the President, or jointly by the Director of National Intelligence (DNI) and the head of the department or agency concerned.

2. This Directive does not apply to purely law enforcement information. When law enforcement information also contains intelligence or intelligence-related information, this Directive shall apply only to the intelligence or intelligence-related information and analysis contained therein.

#### **D. POLICY**

1. The IC Analytic Standards are the core principles of intelligence analysis and are to be applied across the IC. IC Analytic Standards shall be applied in each analytic product in a manner appropriate to its purpose, the type and scope of its underlying source information, its production timeline, and its customers. IC elements may create supplemental analytic standards that are tailored to their particular missions.

2. The IC Analytic Standards are the foundational assessment criteria for a regular program of review of IC analytic products. Each IC element shall maintain a program of product evaluation using the IC Analytic Standards as the core elements for assessment criteria.

02 January 2015

3. The IC Analytic Standards serve as a common IC foundation for developing education and training in analytic skills. The results of analytic product evaluations will be used to improve materials and programs for education and training in analytic knowledge, skills, abilities, and tradecraft.

4. The Standards also promote a common ethic for achieving analytic rigor and excellence, and for personal integrity in analytic practice. Adherence to IC Analytic Standards is safeguarded by the ODNI Analytic Ombuds, who addresses concerns regarding lack of objectivity, bias, politicization, or other issues in Standards application in analytic products.

5. The Standards promote the protection of privacy and civil liberties by ensuring the objectivity, timeliness, relevance, and accuracy of personally identifiable information (PII) used in analytic products. Analysts should include PII in products only as it relates to a specific analytic purpose (e.g., necessary to understand the foreign intelligence or counterintelligence information or assess its importance), consistent with IC element mission and in compliance with IC element regulation and policy, including procedures to prevent, identify, and correct errors in PII.

6. The IC Analytic Standards guide analysis and analytic production. All IC analytic products shall be consistent with the following five Analytic Standards, including the nine Analytic Tradecraft Standards.

a. Objective: Analysts must perform their functions with objectivity and with awareness of their own assumptions and reasoning. They must employ reasoning techniques and practical mechanisms that reveal and mitigate bias. Analysts should be alert to influence by existing analytic positions or judgments and must consider alternative perspectives and contrary information. Analysis should not be unduly constrained by previous judgments when new developments indicate a modification is necessary.

b. Independent of political consideration: Analytic assessments must not be distorted by, nor shaped for, advocacy of a particular audience, agenda, or policy viewpoint. Analytic judgments must not be influenced by the force of preference for a particular policy.

c. Timely: Analysis must be disseminated in time for it to be actionable by customers. Analytic elements have the responsibility to be continually aware of events of intelligence interest, of customer activities and schedules, and of intelligence requirements and priorities, in order to provide useful analysis at the right time.

d. Based on all available sources of intelligence information: Analysis should be informed by all relevant information available. Analytic elements should identify and address critical information gaps and work with collection activities and data providers to develop access and collection strategies.

e. Implements and exhibits Analytic Tradecraft Standards, specifically:

(1) Properly describes quality and credibility of underlying sources, data, and methodologies: Analytic products should identify underlying sources and methodologies upon which judgments are based, and use source descriptors in accordance with ICD 206, *Sourcing Requirements for Disseminated Analytic Products*, to describe factors affecting source quality and credibility. Such factors can include accuracy and completeness, possible denial and deception, age and continued currency of information, and technical elements of collection as well as source access, validation, motivation, possible bias, or expertise. Source summary

statements, described in ICD 206, are strongly encouraged and should be used to provide a holistic assessment of the strengths or weaknesses in the source base and explain which sources are most important to key analytic judgments.

(2) Properly expresses and explains uncertainties associated with major analytic judgments: Analytic products should indicate and explain the basis for the uncertainties associated with major analytic judgments, specifically the likelihood of occurrence of an event or development, and the analyst's confidence in the basis for this judgment. Degrees of likelihood encompass a full spectrum from remote to nearly certain. Analysts' confidence in an assessment or judgment may be based on the logic and evidentiary base that underpin it, including the quantity and quality of source material, and their understanding of the topic. Analytic products should note causes of uncertainty (e.g., type, currency, and amount of information, knowledge gaps, and the nature of the issue) and explain how uncertainties affect analysis (e.g., to what degree and how a judgment depends on assumptions). As appropriate, products should identify indicators that would alter the levels of uncertainty for major analytic judgments. Consistency in the terms used and the supporting information and logic advanced is critical to success in expressing uncertainty, regardless of whether likelihood or confidence expressions are used.

(a) For expressions of likelihood or probability, an analytic product must use one of the following sets of terms:

almost no chance	very unlikely	unlikely	roughly even chance	likely	very likely	almost certain(ly)
remote	highly improbable	improbable (improbably)	roughly even odds	probable (probably)	highly probable	nearly certain
01-05%	05-20%	20-45%	45-55%	55-80%	80-95%	95-99%

Analysts are strongly encouraged not to mix terms from different rows. Products that do mix terms must include a disclaimer clearly noting the terms indicate the same assessment of probability.

(b) To avoid confusion, products that express an analyst's confidence in an assessment or judgment using a "confidence level" (e.g., "high confidence") must not combine a confidence level and a degree of likelihood, which refers to an event or development, in the same sentence.

(3) Properly distinguishes between underlying intelligence information and analysts' assumptions and judgments: Analytic products should clearly distinguish statements that convey underlying intelligence information used in analysis from statements that convey assumptions or judgments. Assumptions are defined as suppositions used to frame or support an argument; assumptions affect analytic interpretation of underlying intelligence information. Judgments are defined as conclusions based on underlying intelligence information, analysis, and assumptions. Products should state assumptions explicitly when they serve as the linchpin of an argument or when they bridge key information gaps. Products should explain the implications for judgments if assumptions prove to be incorrect. Products also should, as appropriate, identify indicators that, if detected, would alter judgments.

(4) Incorporates analysis of alternatives: Analysis of alternatives is the systematic evaluation of differing hypotheses to explain events or phenomena, explore near-term outcomes, and imagine possible futures to mitigate surprise and risk. Analytic products should identify and assess plausible alternative hypotheses. This is particularly important when major judgments must contend with significant uncertainties, or complexity (e.g., forecasting future trends), or when low probability events could produce high-impact results. In discussing alternatives, products should address factors such as associated assumptions, likelihood, or implications related to U.S. interests. Products also should identify indicators that, if detected, would affect the likelihood of identified alternatives.

(5) Demonstrates customer relevance and addresses implications: Analytic products should provide information and insight on issues relevant to the customers of U.S. intelligence and address the implications of the information and analysis they provide. Products should add value by addressing prospects, context, threats, or factors affecting opportunities for action.

(6) Uses clear and logical argumentation: Analytic products should present a clear main analytic message up front. Products containing multiple judgments should have a main analytic message that is drawn collectively from those judgments. All analytic judgments should be effectively supported by relevant intelligence information and coherent reasoning. Language and syntax should convey meaning unambiguously. Products should be internally consistent and acknowledge significant supporting and contrary information affecting judgments.

(7) Explains change to or consistency of analytic judgments: Analytic products should state how their major judgments on a topic are consistent with or represent a change from those in previously published analysis, or represent initial coverage of a topic. Products need not be lengthy or detailed in explaining change or consistency. They should avoid using boilerplate language, however, and should make clear how new information or different reasoning led to the judgments expressed in them. Recurrent products such as daily crisis reports should note any changes in judgments; absent changes, recurrent products need not confirm consistency with previous editions. Significant differences in analytic judgment, such as between two IC analytic elements, should be fully considered and brought to the attention of customers.

(8) Makes accurate judgments and assessments: Analytic products should apply expertise and logic to make the most accurate judgments and assessments possible, based on the information available and known information gaps. In doing so, analytic products should present all judgments that would be useful to customers, and should not avoid difficult judgments in order to minimize the risk of being wrong. Inherent to the concept of accuracy is that the analytic message a customer receives should be the one the analyst intended to send. Therefore, analytic products should express judgments as clearly and precisely as possible, reducing ambiguity by addressing the likelihood, timing, and nature of the outcome or development. Clarity of meaning permits assessment for accuracy when all necessary information is available.

(9) Incorporates effective visual information where appropriate: Analytic products should incorporate visual information to clarify an analytic message and to complement or enhance the presentation of data and analysis. In particular, visual presentations should be used when information or concepts (e.g., spatial or temporal relationships) can be conveyed better in graphic form (e.g., tables, flow charts, images) than in written text. Visual information may range from plain presentation of intelligence information to interactive displays for complex information and analytic concepts. All of the content in an analytic product may be presented

visually. Visual information should always be clear and pertinent to the product's subject. Analytic content in visual information should also adhere to other analytic tradecraft standards.

#### **E. RESPONSIBILITIES**

##### **1. The Deputy DNI for Intelligence Integration (DDNI/II) shall:**

- a. Confirm and direct the application of these Analytic Standards by IC elements in analytic intelligence products;
- b. Conduct an IC-wide program of periodic review and evaluation of analytic intelligence products, guided by the annual identification of functional or geographical areas of analysis for specific review:
  - (1) Disseminate ODNI Analytic Tradecraft Standards Evaluation Rating Criteria to IC elements;
  - (2) Prepare findings of analytic intelligence product reviews for reporting to Congress and relevant IC elements;
  - (3) Develop lessons learned and identify exemplary products for use by IC elements in training;
  - (4) Refine the IC-wide program of periodic review and evaluation based on new lessons learned and best practices identified.
- c. Assist IC elements in effective application of the Analytic Standards; and
- d. Oversee analytic product evaluation programs in individual IC elements to ensure standards and practices are compatible with the IC-wide program.


##### **2. The Chief, Analytic Integrity and Standards Group, within the Office of the DDNI/II, is designated as the ODNI Analytic Ombuds and shall:**

- a. Be available to ODNI analysts who wish to raise concerns about adherence to analytic standards (including tradecraft standards) in analytic products;
- b. Respond to concerns raised by Community analysts, as appropriate, with fact finding, problem solving, conflict resolution, counseling, and recommendations:
  - (1) Analysts in IC elements other than the ODNI must first use existing administrative procedures within their own IC element to raise concerns about adherence to analytic standards;
  - (2) When these internal administrative procedures have been exhausted, or when an analyst believes that those procedures will not preserve confidentiality, the analyst may bring these concerns to the ODNI Analytic Ombuds;
  - (3) In such instances, the ODNI Analytic Ombuds will carry out responsibilities in the same manner as if responding to an ODNI analyst's concerns. The ODNI Analytic Ombuds may address concerns that span more than one IC element; and
- c. Perform all responsibilities confidentially so that analysts may raise concerns without fear of reprisal. However, confidentiality will not extend to significant misconduct, to violations of law or ethics, or when otherwise precluded by law.

## 3. Heads of IC elements shall:

- a. Ensure that analytic intelligence products produced and disseminated by their element properly apply the IC Analytic Standards;
- b. Designate an individual or office responsible for responding to concerns raised by the element's analysts about adherence to analytic standards (including tradecraft standards) in analytic products;
- c. Conduct internal programs of review and evaluation of analytic intelligence products utilizing the IC Analytic Standards as the core criteria, and provide annual status reporting to the DDNI/II according to DDNI/II guidelines; and
- d. Ensure that the IC Analytic Standards are properly addressed in their elements' education and training programs.

**F. EFFECTIVE DATE:** This Directive becomes effective on the date of signature.

  
\_\_\_\_\_  
Director of National Intelligence

2 JANUARY 2015  
\_\_\_\_\_  
Date



# Exhibit C

**From:** Co-Author 1  
**Subject:** RE: SPEAR for Review --- UNCLASSIFIED  
**To:** DTOS/DTAU  
**Sent:** February 6, 2023 11:39 AM (UTC-05:00)  
**Attached:** RadTradSPEAR Draft.docx

Classification: UNCLASSIFIED  
=====

Transitory

Two minor edits.

---

**From:** DTOS/DTAU (CTD) (FBI) @fbi  
**Sent:** Monday, February 06, 2023 11:15 AM  
**To:** Co-Author 1 (RH) (FBI) @fbi  
**Subject:** RE: SPEAR for Review --- UNCLASSIFIED

Classification: UNCLASSIFIED  
=====

Transitory

Hi Co-Auth 1

Thank you for passing this along. I'm gonna take a look at it along with one of the other IAs up here who covers RMVE threats and we'll get our suggestions back to you soon.

v/r  
DTOS/DTAU

---

**From:** Co-Author 1 (RH) (FBI) @fbi  
**Sent:** Thursday, February 02, 2023 3:47 PM  
**To:** DTOS/DTAU (CTD) (FBI) @fbi  
**Subject:** SPEAR for Review --- UNCLASSIFIED

Classification: UNCLASSIFIED  
=====

Transitory

Would you mind to take a look at the attached SPEAR and advise of edits? I will work on the background notes and shoot those to you for your input tomorrow (hopefully).

Thanks!

=====  
Classification: UNCLASSIFIED

=====  
Classification: UNCLASSIFIED

=====  
Classification: UNCLASSIFIED



FEDERAL BUREAU OF INVESTIGATION

FBI INTERNAL – NOT APPROVED FOR EXTERNAL RELEASE

## Strategic Perspective: Executive Analytic Report

### (U//FOUO) Interest of Racially or Ethnically Motivated Violent Extremists in Radical-Traditionalist Catholic Ideology Almost Certainly Presents New Mitigation Opportunities

XX February 2023

(U//FOUO) The FBI assesses the increasingly observed interest of racially or ethnically motivated violent extremists (RMVEs) in radical-traditionalist Catholic (RTC)<sup>a</sup> ideology almost certainly<sup>b</sup> presents opportunities for threat mitigation through the exploration of new avenues for tripwire and source development. Open source reporting and FBI investigations have noted a growing overlap between the far-right white nationalist movement and RTCs. Illustrative of this has been the increasing collaboration of the far-right Catholic media outlet Church Militant (and its activist wing, the Resistance network) with the America First/"groyper"<sup>c</sup> movement.<sup>1,2</sup> The ongoing convergence of the far-right white nationalist movement and RTCs was further demonstrated through the increase in hostility toward abortion-rights advocates on social media sites in the run-up to and aftermath of the *Dobbs v. Jackson Women's Health Organization* decision that overturned *Roe v. Wade*.<sup>3</sup>

- (U//FOUO) According to an FBI Richmond contact with direct access reporting for the first time, prior to RMVE actor [REDACTED] early [REDACTED] 2022 arrest he had been attending the Society of Saint Pius X<sup>d</sup> (SSPX)-affiliated [REDACTED], Virginia, for approximately seven months and was participating in catechism classes as part of the process to become baptized.<sup>4,5</sup> Prior to attending [REDACTED] stated he wanted to find a church that was "anti-Zionist" and "antiprogessive" because "that's where God lives."<sup>6</sup> In [REDACTED] extensive anti-Semitic, antiLGBTQ, and racist postings on the social media platform [REDACTED], [REDACTED] claimed he was a "radical traditional Catholic Clerical Fascist." At the time of [REDACTED] arrest, eight Molotov cocktails, six smoke bombs, one smoke grenade, and firearms components consisting of a complete Glock 19 slide/upper receiver, a

<sup>a</sup> (U) Analyst Note: RTCs are typically characterized by the rejection of the Second Vatican Council (Vatican II) as a valid church council; disdain for most of the popes elected since Vatican II, particularly Pope Francis and Pope John Paul II; and frequent adherence to anti-Semitic, anti-immigrant, anti-LGBTQ, and white supremacist ideology. Radical-traditionalist Catholics compose a small minority of overall Roman Catholic adherents and are separate and distinct from "traditionalist Catholics" who prefer the Traditional Latin Mass and pre-Vatican II teachings and traditions, but without the more extremist ideological beliefs and violent rhetoric. Vatican II took place from 1962-1965 and essentially shaped the modern Roman Rite Catholic Church. It was intended to help the church respond to global cultural changes in the aftermath of World War II and resulted in significant reforms to the liturgy, attitudes toward non-Christian religions, roles and responsibilities of the laity, views on religious freedom, etc.

<sup>b</sup> (U) See Appendix B: Expressions of Likelihood.

<sup>c</sup> (U) The term "groyper" refers to followers of Nick Fuentes's alt-right "America First" movement, which is characterized by its white Christian nationalism platform.

<sup>d</sup> (U) Analyst Note: The Society of Saint Pius X (SSPX) is an international priestly society that promotes the traditional Catholic priesthood and the celebration of the traditional Latin Mass and sacraments. It is named after Pope Pius X whose anti-Modernist stance serves as the organization's inspiration. The SSPX is currently considered "canonically irregular" (i.e., not in full communion with the Vatican). The SSPX has spawned a number of offshoots. These include SSPX-Resistance, aka SSPX-Marian Corps (SSPX-MC), which rejected SSPX attempts to reconcile with the Vatican; the Priestly Fraternity of Saint Peter (FSSP), which holds to many of the SSPX beliefs and practices, but ultimately split from the SSPX to stay in full communion with the Vatican; and the Society of Saint Pius V (SSPV), which does not consider Vatican II valid and binding, questions the legitimacy of all of the popes since Vatican II, and has no canonical standing (i.e., is schismatic).



FEDERAL BUREAU OF INVESTIGATION

FBI INTERNAL – NOT APPROVED FOR EXTERNAL RELEASE

lower parts kit, a 3D printed Glock 19 frame, a magazine, and 9 mm ammunition were found in his possession.<sup>7</sup>

- (U//FOUO) According to an FBI Portland liaison contact with indirect access, as of September 2021, deceased RMVE subject Robert Reynolds had previously posted online that he first sought out a mainline Roman Catholic community that practiced the Novus Ordo liturgy<sup>e</sup> and then gravitated to the SSPX. In a comment posted to an online discussion group Reynolds noted, "I've been trying to be catholic [sic] for 2 years I went to a novus ordo church at first then became radicalized by the internet after they told me to go away because of fake virusb [sic]." Reynolds posted a photograph of himself outside of a Catholic church and several pictures from inside of the church captioned, "The holy sacrifice of the mass. Join the Catholic Taliban." Reynolds also posted graphics depicting Jesus holding an assault rifle.<sup>8</sup> Prior to his death, Reynolds was under investigation by FBI Portland for his involvement in civil disturbances, vandalism, threatening communications, weapons violations, and other acts of violence furthering his white supremacist ideology.<sup>9</sup>
- (U//FOUO) According to an FBI UCE with direct access, as of July 2021, FBI Milwaukee RMVE subject ██████████ attended the SSPX-affiliated ██████████ Church ██████████, California, for over a year prior to his relocation to ██████████. While at ██████████, ██████████ started a ██████████ company, ██████████ to provide ██████████ for the church. ██████████ planned to expand ██████████ to other churches and include "fraternal-based" meetings and events.<sup>10</sup> FBI Los Angeles originally initiated an investigation of ██████████ based on allegations that ██████████ was a neo-Nazi with racist and sexist views known to verbally harass and physically assault those who opposed his positions. ██████████ was a member of Legio Christi<sup>f</sup>, now known as "Imperium," an organization that violently opposes LGBTQ individuals. ██████████ has attempted to acquire unregistered "paperless" firearms and large capacity ammunition magazines in the past.<sup>11</sup>

(U//FOUO) **The FBI assesses RMVE interest in RTCs is likely to increase over the next 12 to 24 months in the run-up to the next general election cycle complicating the overall RMVE threat picture while also creating new opportunities for mitigation efforts.** This assessment is made in light of the ongoing polarization characterizing the US political environment and the probability that policy issues of mutual interest to RMVEs and RTC adherents will remain in the public spotlight. Catalyzing events in which RMVEs and RTC adherents might have common cause include legislation or judicial decisions in areas such as abortion rights, immigration, affirmative action, and LGBTQ protections. The current trend of RMVE interest in RTC ideology provides new opportunities to mitigate the RMVE threat through outreach to traditionalist Catholic parishes and the development of sources with the placement and access to report on RMVEs seeking to use RTC social media sites or places of worship as facilitation platforms to promote violence.

**(U) Prepared by the Richmond Division and the Domestic Terrorism Operations Unit; coordinated with FBI Milwaukee and FBI Portland Divisions.**

<sup>e</sup> (U) Novus Ordo, short for Novus Ordo Missae, refers to the new order of the Catholic Mass promulgated by Pope Paul VI in the aftermath of Vatican II. The Novus Ordo Mass is delivered in the vernacular (as opposed to Latin) and is the normal form of the Mass in the Roman Rite of the Catholic Church.

<sup>f</sup> (U) Legio Christi is not associated with the mainline Roman Catholic religious order known as the Legionaries of Christ, aka the Legion of Christ.

**(U) Analytic Tradecraft Summary**

**(U//FOUO) CONFIDENCE:** This assessment is made with high confidence based on FBI investigations, local law enforcement agency reporting, and liaison reporting, with varying degrees of corroboration and access.

**(U//FOUO) SOURCING:** Reporting in this SPEAR was primarily derived from an FBI Richmond contact with direct access who reported for the first time, an FBI Portland liaison contact with direct access, an FBI Undercover Employee (UCE) with direct access, local law enforcement agency reporting with varying degrees of corroboration and access, and open source reporting. The FBI relied heavily upon FBI investigative case files, local law enforcement agency reporting, and liaison reporting for the key judgement. Open source information was instrumental in providing an understanding of current trends in the far right white nationalist movement and background information on the various RTC and traditionalist Catholic factions.

**(U//FOUO) ASSUMPTIONS:** The FBI based this assessment on the key assumption that RMVEs will continue to find RTC ideology attractive and will continue to attempt to connect with RTC adherents, both virtually via social media and in-person at places of worship.

**(U//FOUO) GAPS:** The FBI does not currently know how many RMVE actors aspiring to commit acts of violence are adhering to RTC ideologies. Additionally, it is unknown if priests or other parishioners within certain RTC communities are recruiting or radicalizing members or individuals. The FBI does not know how many RTC communities exist in the US and what, if any associations currently exist between RTC communities/individuals and other Domestic Violent Extremist groups.

**(U//FOUO) ALTERNATIVES:** The FBI did not include an Analysis of Alternatives in this SPEAR due to the quality of the source information and the lack of significant uncertainties.

**(U//FOUO) ANALYTIC LINE:** (U//FOUO) This is the first FBI SPEAR highlighting the focus on the interest of RMVEs in the RTC movement. This product is based on a FBI Richmond Domain Perspective on the same topic.