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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA, )  
)  
Plaintiff, ) No. 3:19-cr-00112-JO  
)  
vs. ) December 19, 2019  
)  
GLEN STOLL, ) Portland, Oregon  
)  
Defendant. )  
-----

**STATUS CONFERENCE**

TRANSCRIPT OF PROCEEDINGS  
BEFORE THE HONORABLE ROBERT E. JONES  
UNITED STATES DISTRICT COURT SENIOR JUDGE

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APPEARANCES

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P R O C E E D I N G S

THE COURT: Good morning, everybody. Please have a seat.

MS. MADDUX: Good morning, Your Honor. Donna Maddux appearing today on behalf of the United States.

We're here in the matter of United States versus Glen Stoll. It's Case No. 19-cr-112. The defendant is present. He is out of custody. Appearing with him at counsel table is his attorney, Noah Horst.

This is the time set for a status conference regarding the trial date. I'm going to defer to defense counsel for his remarks.

THE COURT: Thank you.

Counsel?

MR. HORST: Good morning, Judge. Noah Horst, H-o-r-s-t.

Ms. Maddux and I were discussing the currently scheduled February trial date, and I told Ms. Maddux there is no way that we were going be ready, given the amount of investigation and designation of the case, et cetera. We decided it would be better to come in and talk to you directly about that rather than filing a continuance motion.

THE COURT: That's fine.

MR. HORST: So here we are today. And I am asking now, and I can ask by written motion and declaration if the

1 Court would like me to do that, for a continuance a little bit  
2 further into the spring.

3 I think one of the considerations that the Government  
4 has is one of the case agents may be retiring soon, and they  
5 are seeking some sort of certainty regarding the trial date,  
6 which I'm okay with, although I don't know that I'm ready  
7 right now to commit to some specific trial date in the future.  
8 I think that we are getting close.

9 I was looking this morning at the associated case  
10 docket, the Bradys' case, which lasted approximately 21 months  
11 from indictment to plea.

12 We intend to go to trial on this case. It's been  
13 approximately 10 months since I've met Mr. Stoll for the first  
14 time. Our relationship, I would like to report, is excellent.

15 THE COURT: Good.

16 MR. HORST: We are communicating very well. And we  
17 are developing witnesses, case theory, investigation, which  
18 I'm happy to talk about outside the presence of --

19 THE COURT: How long do you think it will take to try  
20 the case?

21 MR. HORST: How many days?

22 THE COURT: Yeah, or weeks.

23 MR. HORST: Gosh, I think it's going to take a couple  
24 of weeks, Judge.

25 THE COURT: Yeah.

1 MS. MADDUX: And, Your Honor, I think the  
2 Government's case is no more than five days in this matter.  
3 We charged a very narrow window of time, and it's only the  
4 activity that involves Mr. Stoll and the Bradys that is  
5 charged in the indictment.

6 THE COURT: Are we going to put off the Bradys'  
7 sentence until after the trial?

8 MS. MADDUX: That is the plan, Your Honor. We've  
9 continued to push that back, knowing that we -- we're waiting  
10 until we have some certainty about the trial.

11 THE COURT: You'll be calling them?

12 MS. MADDUX: Yes, Your Honor. We will be calling --  
13 Karl Brady will be testifying.

14 THE COURT: Thank you.

15 Well, I need a specific date, so we'll set that  
16 today.

17 What would be your best -- realizing that if we get  
18 closer to it, if you have continued problems, I'll address  
19 them at that time, but I need a specific date today.

20 MR. HORST: Okay. May I have one second to speak  
21 with Mr. Stoll about that?

22 THE COURT: You can have more than that.

23 MR. HORST: Okay. Thank you.

24 (The defendant and his counsel confer off the  
25 record.)

1 MR. HORST: Judge, we would like to ask for a  
2 September trial date, recognizing that's far out.

3 THE COURT: That's too far.

4 MR. HORST: My other proposal would be to set  
5 something in the early summer, with the recognition that it's  
6 possible that I would come back to the Court again, asking for  
7 more time.

8 And if we need to talk more about the details of the  
9 defense investigation and as to why that is complicated and  
10 time-consuming, I'm happy to do that. But, again, I'd ask the  
11 Government to leave if we were going to put that kind of thing  
12 on the record.

13 THE COURT: Well, I don't need it on the record.  
14 We'll address them. But we'll set it in May.

15 Pick a date.

16 MR. HORST: May I look at my calendar, Judge, in May?

17 THE COURT: Sure.

18 MS. MADDUX: Your Honor, the Government is fairly  
19 open in May.

20 THE COURT: Fine.

21 The discovery has produced how much material?

22 MS. MADDUX: Your Honor, I don't have a total amount  
23 off the top of my head. But all of the discovery was produced  
24 very early on in the case. We had a supplement to that  
25 discovery that we produced a few months back.

1 THE COURT: I know you specialize in careers, not  
2 cases, so you set the record in a prior case with me. But  
3 about how many exhibits, just an estimate?

4 MS. MADDUX: We've talked with the agents about this,  
5 Your Honor. I think we can get this in in under 200 exhibits.

6 THE COURT: Well, that's fine.

7 MS. MADDUX: Yeah.

8 THE COURT: That's puny compared to what you're used  
9 to.

10 All right. Your date?

11 MR. HORST: Judge, May looks pretty good to me. It  
12 depends, I guess, on the Court's schedule. I would prefer  
13 later in the month as opposed to early in the month.

14 THE COURT: Something around the 15th, Becky.

15 THE CLERK: We could do May 19th. That's a Tuesday.

16 MR. HORST: That would work for the defense, Judge.

17 MS. MADDUX: And for the Government as well.

18 THE COURT: Jury trial?

19 MR. HORST: Yes.

20 THE COURT: Thank you.

21 Anything further to cover today?

22 MR. HORST: There are a few things that Mr. Stoll  
23 would like to cover while we're --

24 THE COURT: We're here to hear --

25 MR. HORST: -- we're at attention.

1           Becky, did you have a question?

2           THE CLERK: Yes. Is he waiving his speedy trial  
3 rights, on the record?

4           MR. HORST: That's right.

5           For the purposes of this continuance, from February  
6 to May, Mr. Stoll will waive his rights to a speedy trial,  
7 although he wanted me to remind the Court of his previous  
8 objections and dissatisfaction with the timeliness that the  
9 discovery was provided in and his early insistence that we go  
10 to trial. Even though I was asking for more time on the case,  
11 Mr. Stoll was not.

12          THE COURT: Yes. I heard him.

13          MR. HORST: He was wanting to go to trial.

14          So I just wanted to speak for Mr. Stoll in that  
15 regard.

16          So in answer to Becky's question, yes, from February  
17 to May, he is consenting to that delay, as I understand it.

18          THE DEFENDANT: Or even to September.

19          MR. HORST: Or even to September, although that's not  
20 the date.

21          MS. MADDUX: Would it need to be effective today?  
22 Would it be December, since we're allowing additional time  
23 from today, so from December to May?

24          THE DEFENDANT: Why not?

25          MR. HORST: Okay.



1 THE COURT: Thank you.

2 MR. HORST: Thank you, Judge.

3 There are a few other things that Mr. Stoll would  
4 like to speak about with the Court. Those are his release  
5 conditions. And we had a long hearing several months ago  
6 where the Court very patiently went through those release  
7 conditions, and we very much appreciate that.

8 Mr. Stoll would like to ask the Court for permission  
9 to speak with his pastor, Paul Revere. He's been prohibited,  
10 at the Government's recommendation, from doing that.

11 And my recollection from our last in-person hearing  
12 was that the Court said something to the effect of "Well, if  
13 he's really a pastor and other people use him as a pastor,  
14 then we might consider it."

15 THE COURT: Is he here today?

16 MR. HORST: Paul Revere is not here today.

17 THE COURT: All right.

18 MR. HORST: But I suppose one of the things that I  
19 would like the Court to address and maybe the Government to  
20 address is what the reason for that prohibition is.

21 THE COURT: Because he is a -- as far as I was  
22 concerned, he was a pseudo pastor, he wasn't a real pastor,  
23 and it's -- he doesn't have a congregation, that I know of, or  
24 a church. He's just an individual.

25 So that's where I am.

1 MR. HORST: Judge, even if that were true, it would  
2 typically be inappropriate in a criminal case to prohibit  
3 contact with anybody, unless there was some nexus to the  
4 allegations.

5 THE COURT: Well, we'll ask the Government.

6 MR. HORST: Thank you.

7 THE COURT: What is the nexus of Paul Revere?

8 MS. MADDUX: So two parts to the answer to your  
9 question, Your Honor.

10 Mr. Revere is essentially someone who worked with  
11 Mr. Stoll in assisting the Bradys in this process. Based on  
12 our information --

13 THE COURT: Is he a tax advisor?

14 MS. MADDUX: He is not. He is the pastor of the  
15 Embassy of Heaven, which is part of Mr. Stoll's operation. He  
16 works in concert with the Embassy of Heaven in terms of  
17 allowing his clients to sign up to be part of a church.

18 I will say, Your Honor, after our last hearing and  
19 we had a discussion about this prohibition, I did a little  
20 research on whether or not these kinds of conditions are  
21 usually upheld at the Ninth Circuit. And had this -- knowing  
22 now this would have come up today, I would have brought some  
23 of that research with me.

24 But the Government is not seeking a no contact order  
25 between Mr. Stoll, at this time, and Paul Revere.

1 THE COURT: All right. Thank you. That settles  
2 that.

3 He may consult with Paul Revere at his pleasure.

4 MR. HORST: Thank you.

5 And just for Mr. Stoll's benefit, there's no  
6 restriction on their communication or contact whatsoever?

7 THE COURT: None whatsoever.

8 MR. HORST: Okay.

9 My understanding is that Mr. Nischik from pretrial  
10 services is here. And I know that one of the initial  
11 conditions of that prohibition included the name Paul Revere  
12 and some initials. I don't have that in front of me.

13 THE COURT: Well, they had the initials of the  
14 Bradys.

15 MR. HORST: Okay. We're not seeking -- thank you,  
16 Judge.

17 MS. MADDUX: Just for the record, I believe the  
18 initials were the initials of Mr. Revere's true name, because  
19 Paul Revere is not his true name.

20 THE COURT: Okay.

21 (The defendant and his counsel confer off the  
22 record.)

23 THE COURT: Sir?

24 MR. HORST: Thank you, Judge.

25 One other issue that we would like to address with

1 the Court, you'll recall the Court allowed Mr. Stoll to  
2 continue to perform his duties as a minister of the gospel,  
3 but the Court said no taxes, no banking.

4 THE COURT: Right.

5 MR. HORST: Or at least that's how --

6 THE COURT: He's not to be advising anybody about  
7 taxes or how to evade paying them.

8 MR. HORST: Understood.

9 However, Mr. Stoll would like to be able to discuss  
10 taxes and bank matters so long as it's not, as the Court says,  
11 designed to advise people how to evade taxes or banking.

12 It's difficult, as Mr. Stoll interprets these  
13 conditions very seriously, as he doesn't want to go into  
14 custody, he doesn't talk about banking or taxes or anything  
15 related to church administration.

16 THE COURT: There's no reason for him to be talking  
17 to anybody about taxes. He's under indictment for tax  
18 evasion. And that's going to be enforced.

19 (The defendant and his counsel confer off the  
20 record.)

21 MR. HORST: Excuse me. Forgive me, Judge.

22 Mr. Stoll would like to be able to communicate with  
23 the IRS about tax matters. Is that okay?

24 THE COURT: Counsel?

25 MS. MADDUX: Your Honor, the Government has no

1 objection to Mr. Stoll communicating with the IRS about his  
2 own personal tax matters. But it would be a violation of not  
3 only his pretrial release currently, but the injunction and  
4 restraining order that is still in place out of the District  
5 of Washington for him to communicate with the IRS on behalf of  
6 a client or someone he represents.

7 THE COURT: He may not do that. But he may  
8 communicate with the IRS about his own situation. Okay?

9 (The defendant and his counsel confer off the  
10 record.)

11 MR. HORST: Judge, forgive me. I understand what you  
12 just said. Mr. Stoll would like me to help clarify what you  
13 just said. In light of his -- his duties as a church  
14 administrator --

15 THE COURT: His duties as a church administrator does  
16 not involve giving other people tax advice.

17 The whole thing is that you're out of the tax advice  
18 business until we have this trial.

19 (The defendant and his counsel confer off the  
20 record.)

21 MR. HORST: Judge, I'm trying --

22 THE COURT: Would you like to have him speak directly  
23 to the Court?

24 MR. HORST: Not really.

25 THE COURT: Okay. That's fine.

1 (The defendant and his counsel confer off the  
2 record.)

3 MR. HORST: Again, I understand what the Court has  
4 said.

5 THE COURT: Yes.

6 THE DEFENDANT: I do, too.

7 THE COURT: I didn't ask you to agree with it.  
8 That's my order.

9 MR. HORST: I understand. And at the risk of the  
10 Court getting angry with me --

11 THE COURT: I'm not going to get angry with you.

12 MR. HORST: Okay. Thank you, Judge.

13 Our position is that Mr. Stoll -- Mr. Stoll is an  
14 administrator of the church; and that as part of his duties as  
15 a church administrator, he is required to have some discussion  
16 about the financial issues that take place within the church.

17 Our position is that by prohibiting him from doing  
18 that, it prevents his ability to serve his God in the way that  
19 he chooses to do that, which is through his church ministry.

20 THE COURT: I can just state, we're just going to put  
21 that in neutral until this trial is over. And he's not to be  
22 involved in tax consultation in any form with anybody else,  
23 other than you, any experts that you choose to consult, and  
24 nobody else.

25 MR. HORST: And the IRS.

1 THE COURT: Yes, certainly he can talk to the IRS.  
2 (The defendant and his counsel confer off the  
3 record.)

4 THE COURT: We're not going to allow him to continue  
5 his tax consulting, how to evade paying taxes. That's where  
6 we are until this trial is over.

7 MR. HORST: Understood.

8 THE COURT: Thank you.

9 (The defendant and his counsel confer off the  
10 record.)

11 MR. HORST: Judge, Mr. Stoll would like to try to  
12 clarify something with the Court. I'm not thrilled about him  
13 talking on the record, but I'm going to allow him, until I  
14 kick him, at which point he's to stop talking.

15 Is it all right if he addresses the Court briefly on  
16 this issue?

17 THE COURT: Fine.

18 MR. HORST: Okay.

19 THE COURT: Go ahead, sir. You can remain seated and  
20 speak into the mic.

21 THE DEFENDANT: All right. Well, thank you very  
22 much. I appreciate this opportunity.

23 The only concern I just wanted to address to you is  
24 that as a church administrator, I -- I do matters pertaining  
25 to taxes, but not advising as far as tax -- whether a person

1 is taxable, how to pay or file taxes. I've never done that  
2 sort of thing, and I have no interest in doing that. But  
3 there are obligations that church ministries have and concerns  
4 that people have regarding taxes.

5 And then there's a second thing which has to do with  
6 banking and transaction of funds that need to be done. It's  
7 very important for the survival of the church and -- and the  
8 needs that we have in our ministry work that we do. And  
9 people have relied on me to interface with banks and financial  
10 transactions to make sure everything is being done lawfully  
11 and properly and to intercede when there's a financial  
12 question or problem, that I help out in that sort of -- I used  
13 to, but since this prohibition, I have every intention of  
14 respecting your wishes, and I always have and I will continue.

15 But if I could get some kind of relief from you that  
16 I'm allowed to interface with these things in a lawful manner,  
17 I would really appreciate that.

18 And thank you very much.

19 THE COURT: What is your response?

20 MS. MADDUX: Your Honor, a large portion of the  
21 Government's case -- and, really, the factual allegations  
22 behind the permanent injunction -- involve Mr. Stoll advising  
23 clients. They sign paperwork, they pay him, and they join his  
24 ministry, which is in part related to the Embassy of Heaven.

25 So to the extent that Mr. Stoll is referring to his



1 role as a church administrator of church ministries, it's the  
2 Government's position that they are not valid churches, but  
3 essentially organizations designed and put on paper for the  
4 purpose of evading income.

5 We are aware, because it is part of the underlying  
6 Brady matter and part of this case, that as part of setting up  
7 these church ministries for people, Mr. Stoll will set up bank  
8 accounts in other names, sometimes under related church names.

9 He will create a name for them and essentially advise  
10 clients, just as he advised Mr. Brady, "Route your income  
11 outside of the normal mechanism, not to your own bank account,  
12 but to this ministry bank account I will hold for you. And  
13 then I will be the one to decide whether or not you get to  
14 spend funds or at least will be the one interfacing with the  
15 bank about it."

16 So the Government's position is that the very  
17 activity Mr. Stoll is talking about is the activity he is  
18 barred from doing underneath the permanent injunction, and he  
19 should not be allowed to carry on pending trial.

20 THE COURT: Thank you.

21 Do you want to respond?

22 (The defendant and his counsel confer off the  
23 record.)

24 THE COURT: Let me just state that I understand your  
25 position. I hope you understand my position. I also

1 appreciate your respect to the Court, that you're not being  
2 abusive or vocal, as we find in many of these tax cases.

3 I just can't let you give advice on taxation to  
4 anyone between -- other than to your own counsel or tax  
5 advisor, until we get to trial.

6 That's my order.

7 THE DEFENDANT: Sure. I appreciate that.

8 Now, did you want a response from me to her?

9 THE COURT: Any time.

10 THE DEFENDANT: Oh, thank you.

11 I just wanted to make sure you were aware that what  
12 we intend to prove is that the type of work that I do, that  
13 I've always been involved in, and I'm continuing and is being  
14 hindered now because of this, is running clean and sober  
15 houses, a mentoring program for children, and helping people  
16 getting out of sex trafficking, and other kinds of legitimate  
17 ministry work.

18 None of these things they're saying about me are  
19 true. And the kinds of prohibitions that are being placed are  
20 severely hindering the effectiveness and causing great expense  
21 to these worthwhile ministries.

22 And if we can be allowed -- if I can be allowed to  
23 engage in lawful, never giving tax preparation advice or  
24 anything of that nature -- I have no intentions to and I have  
25 no desire to. It's just the fact of assisting and interfacing

1 with the lawful requirements that the church -- various church  
2 ministries have in performing some of these various functions.

3 THE COURT: I understand your position. But what you  
4 consider to be lawful the Government considers to be unlawful.  
5 And that's to be the issue that we'll decide at the time of  
6 trial.

7 So you'll not be giving -- consulting anyone about  
8 their taxes.

9 THE DEFENDANT: "Assisting" is actually the term, not  
10 "consulting." Is it the same thing for you?

11 THE COURT: Even assisting.

12 THE DEFENDANT: Okay.

13 Well, thank you for your consideration anyway. I  
14 appreciate that.

15 THE COURT: Okay. Thank you.

16 Anything further?

17 MS. MADDUX: Not from the Government, Your Honor.

18 THE COURT: Thank you.

19 Okay. Well, any time you want a consultation with  
20 the Court, I'm available.

21 Thank you.

22 MR. HORST: Thank you, Judge.

23 MS. MADDUX: Thank you.

24

25 (Proceedings concluded. )

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I certify, by signing below, that the foregoing is a correct transcript of the record of proceedings in the above-titled cause. A transcript without an original signature, conformed signature or digitally signed signature is not certified.

*/s/ Nancy M. Walker*

*2-5-20*

\_\_\_\_\_  
NANCY M. WALKER, CSR, RMR, CRR  
Official Court Reporter  
Oregon CSR No. 90-0091

\_\_\_\_\_  
DATE