### EXHIBIT 1A

### ← Truth Details

4041 replies





WOW! I just came out of the Biden Witch Hunt Trial in Manhattan, the "Icebox," and was shown Reports that Crooked Joe Biden's DOJ, in their Illegal and UnConstitutional Raid of Mar-a-Lago, AUTHORIZED THE FBI TO USE DEADLY (LETHAL) FORCE. NOW WE KNOW, FOR SURE, THAT JOE BIDEN IS A SERIOUS THREAT TO DEMOCRACY. HE IS MENTALLY UNFIT TO HOLD OFFICE — 25TH AMENDMENT!

11.4k ReTruths 28.9k Likes

May 21, 2024, 5:21 PM

# EXHIBIT 1B

https://sendview.io/s/a\_5AGsaVbKqdJ7z8Bp Case 9:23-cr-80101-AMC Document 652-1 Entered on FLSD Docket 06/26/2024 Page 4 of 14



### **STOP THE WITCH HUNT**



### BREAKING FROM TRUMP: BIDEN'S DOJ WAS AUTHORIZED TO SHOOT ME!

It's just been revealed that Biden's DOJ was authorized to use DEADLY FORCE for their DESPICABLE raid in Mar-a-Lago.

You know they're just itching to do the unthinkable...

Joe Biden was locked & loaded ready to take me out & put my family in danger.

He thinks he can frighten me, intimidate me, and **KNOCK ME DOWN!** 

But worst of all? They think their **THUG TACTICS** will cause proud supporters like YOU to abandon me.

But here's the one thing they don't know: WE WILL NEVER SURRENDER!

Biden's corrupt regime needs to get the message - right here, right now - that our patriotic movement CANNOT BE STOPPED!

So before the day is over, I'm calling on ONE MILLION Pro-Trump patriots to chip in and say, STOP THE WITCH HUNT AGAINST PRESIDENT TRUMP! >

**STOP THE WITCH HUNT** 

I know you & I will have the last laugh when we peacefully win back the White House in November.

BUT I WON'T WIN WITHOUT YOUR SUPPORT!

So I'm humbly asking for you to please, PLEASE stand with me today. >

**STAND WITH TRUMP** 

With you by my side, **WE WILL MAKE AMERICA GREAT AGAIN!** 

Thank you,





Donald J. Trump 45th President of the United States

**STOP THE WITCH HUNT** 

Contributions to Trump National Committee JFC Inc. are not deductible for federal income tax purposes.

All contributions are subject to the limits and prohibitions of the Federal Election Campaign Act.

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#### donaldjtrump.com

Thank you for joining Team Trump. We believe this is an important way to reach our grassroots supporters with the most up-to-date information regarding President Trump, and we're glad you're on our team. It's because of grassroots supporters like YOU that we've been able to consistently call out the Fake News media EVERY SINGLE TIME they've tried to spread misinformation or outright LIES about the important work President Trump is doing to SAVE AMERICA. Reaching grassroots supporters directly is CRITICAL if we're going to Save America from Joe Biden and the Left. But in order to do that, we need to provide supporters with the most up-to-date information on all of our efforts.

TEXT "TRUMP" to 88022 to start receiving text messages from President Trump.

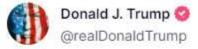
It's because of the commitment and support from real Patriots, like YOU, that we will SAVE AMERICA! Thank you again for your generous support. If you'd like to change your subscription status follow this link.

**Privacy Policy** 

# EXHIBIT 1C

### ← Truth Details



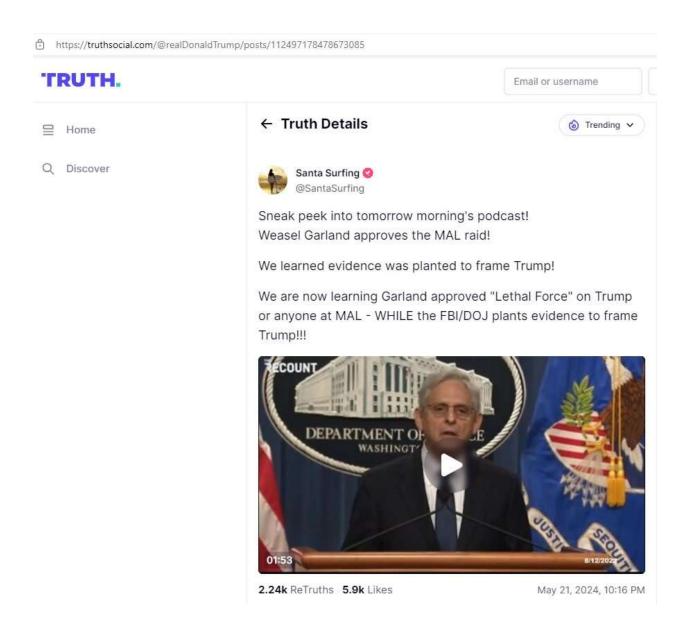


I have gotten to know so many amazing United States Secret Service Agents - It has been my honor to have them protecting me and my family since our historic 2016 Victory against "Beautiful" Hillary Clinton. Shockingly, however, Crooked Joe Biden's Department of Injustice authorized the use of "deadly force" in their Illegal, UnConstitutional, and Un-American RAID of Mar-a-Lago, and that would include against our Great Secret Service, who they thought might be "in the line of fire." As I told Crooked Joe's DOJ, if they needed anything, "all they had to do was ask." They did not have to ILLEGALLY AND UNCONSTITUTIONALLY RAID my home, and rummage through my family's, including Barron's, private quarters. END THESE THIRD WORLD WITCH HUNTS, AND MAKE AMERICA GREAT AGAIN!

3.92k ReTruths 12.2k Likes

May 23, 2024, 12:09 AM

### EXHIBIT 1D



### EXHIBIT 1E



# EXHIBIT 8A

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK: PART 59

THE PEOPLE OF THE STATE OF NEW YORK

-against-

DONALD J. TRUMP,

AFFIDAVIT OF NICHOLAS PISTILLI

Ind. No. 71543-23

Defendant.

#### **AFFIDAVIT**

Nicholas Pistilli, a person not a party to this action, states under penalty of perjury that:

- 1. I am a Sergeant in the New York Police Department ("NYPD"). Since January of 2022, I have served as the commanding officer of the security detail for New York County District Attorney Alvin Bragg. In that role, I am responsible for, among other things, monitoring threats of violence against the District Attorney, his family, and his Office.
- 2. I am familiar with the facts and circumstances stated herein. This affidavit is based upon my personal knowledge, as well as upon information and belief based on information providing by other employees of the NYPD or the DA's Office, and on records maintained by the NYPD or the DA's Office in the ordinary course of business, which I believe to be true and correct.
- 3. I monitor threats in coordination with the NYPD's Threat Assessment & Protection Unit ("TAPU"), a unit within NYPD's Intelligence Bureau. NYPD's Intelligence Bureau gathers and analyzes information to assist in the detection and prevention of unlawful activity, including acts of terror. Within the Intelligence Bureau, TAPU's purview includes monitoring and investigating threats against public officials, including the District Attorney. TAPU monitors social media posts, including activity on the "dark web", as well as any threats

reported to TAPU by public officials, including threats received by phone call, text message, social media direct message, voicemail, email, and mail.

- 4. In 2022, TAPU logged 483 threat cases. Of the 483 threat cases, 1 involved threats to the District Attorney, his family, or his employees. The remaining cases were threats against other public officers or elected officials.
- 5. In 2023, TAPU logged 577 threat cases. Of the 577 threat cases, 89 involved threats to the District Attorney, his family, or his employees. The remaining cases were threats against other public officers or elected officials.
- 6. In 2023, the first threat case involving the District Attorney, his family, or his employees was logged on March 18, 2023.
- 7. Prior to March 20, 2023, the first review of threatening, harassing, or offensive calls and emails was conducted by DA investigators or NYPD detectives detailed to the DA's Office. The volume of such calls and emails was so low that initial review could be conducted by these investigators and detectives while they fulfilled their primary responsibility of assisting in the casework of the DA's Office. Additionally, because the volume of such calls and emails was low, the DA's Office did not have a system for tracking such calls and emails.
- 8. By March 20, 2023, the volume of threatening, harassing, or offensive calls and emails increased significantly, exceeding the capacity of the DA Office's investigators and NYPD detectives detailed to the DA's Office. Starting on March 20, 2023, all such calls and emails were forwarded directly to TAPU for review and assessment.
- 9. When TAPU reviews an item (e.g., social media post, phone call, text, email, etc.), TAPU makes an initial determination of whether the item warrants additional investigative steps. If it does, TAPU opens a "Threat Case." Depending on the results of additional

2

investigative steps, the item may be referred for further investigation in partnership with a prosecutor's office.

- 10. Since the DA took office on January 1, 2022, through mid-March of 2023, none of the threats received required referral for further investigation in partnership with a prosecutor's office. In the three weeks following March 18, 2023, several threats received that ultimately were referred for further investigation in partnership with a prosecutor's office.
- 11. One public example of a threat during that time-period is documented in the felony complaint in *People v. Craig Deleeuw Robertson* (D. Utah, 2003). The complaint details that:

"On or about March 18, 2023 . . . [the defendant], did knowingly transmit in interstate commerce a communication containing a threat to injure the person of another, the New York County District Attorney, Alvin Bragg, to wit:

#### **ALVIN BRAGG**

Heading to New York to fulfill my dream of iradicating [sic] another of George Soros two-but political hach [sic] DAs.

I'll be waiting in the courthouse parking garage with my suppressed Smith & Wesson M&P 9mm to smoke a radical fool prosecutor that should never have been elected.

I want to stand over Bragg and put a nice hole in his forehead with my 9mm and watch him twitch as a drop of blood oozes from the hole as his life ebbs away to hell!!

BYE, BYE, TO ANOTHER CORRUPT BASTARD!!!'

all in violation of 18 § U.S.C. 875(c)."

12. According to the DA Office's IT systems, at its peak, in March 2023, more than 600 emails and phone calls received by the DA's office were forwarded for security review; this represents a small subset of the calls and emails received by the office relating to *People v*.

3

Trump. Around this time, the emails, calls, and text messages received were directed not just to the DA or to the Office generally, but also to senior members of the DA executive team and ADAs publicly associated with *People v. Trump*, via both Office email or phone and personal email and phone. The messages received in March of 2023 were the first time I was aware of threatening messages relating to the work of the DA's Office being directed at employees of the Office other than the DA.

- 13. Some of the specific threats that were recorded as a threat case include:
  - a. On March 19, 2023: "Leave Trump alone . . . or Bragg will get assassinated"
  - b. On March 19, 2023: "Just shoot Bragg in the head and he stops being a problem."
  - c. On March 21, 2023, "If you lay a hand on President Trump or his family, friends, supporters, or myself, my family or any patriot—instant death."
  - d. On March 22, 2023, "Just wanted to say I can't wait to watch you swing from a rope in your military tribunal, you disgusting George Soros puppet, fucking money will get you nowhere, you better get on your knees and pray to Jesus Christ your gonna find your maker soon."
  - e. On April 3, 2023, "When your fat fuck DA is more interested in a witch hunt on president Trump than prosecuting crime in you shit hole city, its time to get rid of both of you n\*\*\*\*\*" (modified with asterisks to obscure racial slur).
  - f. On April 4, 2023, "You want to go after Donald Trump because you have a crime ridden city, all that shit is racially and politically motivated. More so racial because Alvin Bragg is nothing but a racist n\*\*\*\*" (modified with asterisks to obscure racial slur).

g. On April 6, 2023, "...Your going to get what you got coming. Your tearing

the country apart, your going to get it. I'm not making threats...."

14. In addition to monitoring threats of violence received by the Office, my unit is

also involved in responding to attacks on the Office. In the past year, the Office has twice

received terroristic mailings. Last year, the Office twice received envelopes containing white

powder. Both incidents disturbed normal operations at the DA's Office, although in both

incidents the powder was determined not to be a dangerous substance.

a. On March 24, 2023, the Office received a letter addressed to the DA

containing a small amount of white powder and a note stating: "Alvin: I'm

going to kill you".

b. On April 12, 2023, the Office received a letter addressed to the DA containing

a white powder and a note including images of the DA and of Donald Trump

and the words "you will be sorry."

Dated: February 22, 2024

Nicholas Pistilli

### EXHIBIT 8B

COUNTY OF NEW YORK: PART 59	
THE PEOPLE OF THE STATE OF NEW YORK	AFFIDAVIT OF NICHOLAS PISTILLI
-against- DONALD J. TRUMP,	Ind. No. 71543-23
Defendant.	

Nicholas Pistilli, a person not a party to this action, states under penalty of perjury that:

**AFFIDAVIT** 

- 1. I am a Sergeant in the New York Police Department ("NYPD"). Since January of 2022, I have served as the commanding officer of the security detail for New York County District Attorney Alvin Bragg. In that role, I am responsible for, among other things, monitoring threats of violence against the District Attorney, his family, and his Office.
- 2. I am familiar with the facts and circumstances stated herein. This affidavit supplements my earlier affidavit dated February 22, 2024, and is based upon my personal knowledge, as well as upon information and belief based on information provided by other employees of the NYPD or the DA's Office, and on records maintained by the NYPD or the DA's Office in the ordinary course of business, which I believe to be true and correct.
- 3. In 2024, as of today, NYPD's Threat Assessment & Protection Unit ("TAPU"), a unit within NYPD's Intelligence Bureau, logged 289 threat cases. Of the 289 threat cases, 61 involved threats to the District Attorney, his family, or his employees. The remaining cases were threats against other public officers or elected officials.

4. Most of the 61 threat cases in 2024 that involve threats to the District Attorney, his

family, or employees of the District Attorney's Office were made in the past few months, including

25 in April 2024, 24 in May 2024, and 7 in June to date.

5. In 2024, four threats regarding the District Attorney or the Office were referred for

further investigation in partnership with a prosecutor's office.

6. For example, threat cases logged in 2024 included language: "we will kill you all";

"[...] should be in witness protection"; "you are dead [expletive]"; "Your life is done"; and "RIP".

Threat cases were also logged for a post showing sniper sights on people involved in this case or

a family member of such a person; and a post disclosing the home address of a DA Office

employee.

7. Another of the threats logged, on April 15, 2024, was a bomb threat to the

residences of two people involved in this case. April 15 was the first day of the trial in People v.

Trump.

8. According to the DA Office's IT systems, from April 2024 to date, nearly 500

emails and phone calls received by the DA's office were forwarded for security review. As not all

emails and calls received are forwarded for security review, this presumably represents only a

subset of the calls and emails received by the office relating to People v. Trump.

Dated:

June 20, 2024

Nicholas Pistilli

# EXHIBIT 8C

TRINA A. HIGGINS, United States Attorney (#7349)
CAMERON P. WARNER, Assistant United States Attorney (#14364)
Attorneys for the United States of America
Office of the United States Attorney
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111-2176

### IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

VS.

CRAIG DELEEUW ROBERTSON,

Defendant.

Case No.

FELONY COMPLAINT

COUNT 1 SEALED

Violation of 18 U.S.C. § 875(c) (Interstate Threats)

COUNT 2

Violation of 18 U.S.C. §115(a)(1)(B) (Influencing, Impeding, and Retaliating Against Federal Law Enforcement Officers by Threat)

COUNT 3

Violation of 18 U.S.C. § 871(a) (Threats Against the President)

Judge

Before the Honorable

Magistrate Judge for

the District of Utah, appeared the undersigned, who on oath deposes and says:

#### COUNT 1

18 U.S.C. § 875(c) (Interstate Threats)

On or about March 18, 2023, in the District of Utah,

### CRAIG DELEEUW ROBERTSON,

defendant herein, did knowingly transmit in interstate commerce a communication containing a threat to injure the person of another, the New York County District Attorney, Alvin Bragg, to wit:

#### **ALVIN BRAGG**

Heading to New York to fulfill my dream of iradicating [sic] another of George Soros two-but political hach [sic] DAs.

I'll be waiting in the courthouse parking garage with my suppressed Smith & Wesson M&P 9mm to smoke a radical fool prosecutor that should never have been elected.

I want to stand over Bragg and put a nice hole in his forehead with my 9mm and watch him twitch as a drop of blood oozes from the hole as his life ebbs away to hell!!

BYE, BYE, TO ANOTHER CORRUPT BASTARD!!!"

all in violation of 18 § U.S.C. 875(c).

### COUNT 2

18 U.S.C. § 115(a)(1)(B) (Influencing, Impeding, Retaliating Against Federal Law Enforcement Officers by Threat)

On or about March 24, 2023, in the District of Utah,

#### CRAIG DELEEUW ROBERTSON,

defendant herein, did threaten to assault and murder and SA-1, both of whom are

Federal law enforcement officers with the Federal Bureau of Investigation, with the intent
to impede and intimidate and SA-1 while they were engaged in the performance of

their official duties, and with the intent to retaliate against and SA-1 on account of the performance of their official duties, in violation of 18 U.S.C. §§ 115(a)(1)(B) and 115(b)(4).

### **COUNT 3**

18 U.S.C. § 871(a) (Threats Against the President)

On or about August 7, 2023, in the District of Utah,

### CRAIG DELEEUW ROBERTSON,

defendant herein, did knowingly and willfully make a threat to take the life of and to inflict bodily harm upon the President of the United States, to wit:

"I HEAR BIDEN IS COMING TO UTAH. DIGGING OUT MY OLD GHILLE SUIT AND CLEANING THE DUST OFF THE M24 SNIPER RIFLE. WELCOM, BUFFOON-IN-CHIEF!" all in violation of 18 U.S.C. § 871(a).

### **ELEMENTS OF OFFENSES**

The elements for a violation of 18 U.S.C. § 875(c), Interstate Threats, are:

- (1) the defendant knowingly transmitted a communication containing a threat to injure the person of another,
- (2) the defendant transmitted the communication with the intent to make a threat, or with knowledge that the communication will be viewed as a threat; and
- (3) the communication was transmitted in interstate or foreign commerce.

The elements for a violation of 18 U.S.C. § 115(a)(1)(B), Influencing, Impeding, and Retaliating Federal Law Enforcement Officers by Threat, are:

(1) that the defendant threatened to assault, kidnap, or murder a United States

- official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under 18 U.S.C. § 1114, and
- (2) the defendant did so with intent to impede, intimidate, or interfere with such official, judge, or law enforcement officer while he or she was engaged in the performance of official duties, or with the intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties.

The elements for a violation of 18 U.S.C. § 871(a), Threats Against the President, are:

- (1) the defendant knowingly and willfully made a true threat to take the life of, to kidnap, or to inflict bodily harm upon a victim; and
- (2) the victim was the President of the United States, the President-elect, the Vice President or other officer next in the order of succession to the office of President of the United States, or the Vice President-elect.

#### PROBABLE CAUSE

This complaint is made on the basis of investigation consisting of the following:

1. I am a Special Agent with the Federal B	ureau of Investigation (FBI),
I am currently	v assigned
	and primarily investigate complex
criminal organizations, such as criminal gangs and dru	ug trafficking organizations.
During my time as a law enforcement officer, I have investigated matters involving	
violent acts, to include aggravated assault, rape, and h	omicide, threats of violence,
extortion, kidnapping, murder-for-hire, money laundering, weapons violations, drug	
trafficking, fraud, and more.	

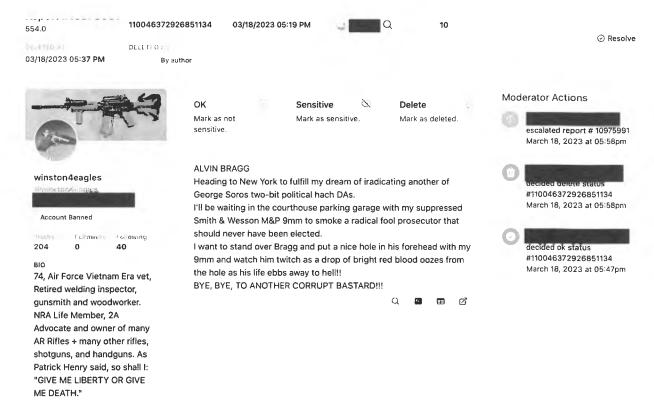
- 2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. Consequently, I am an "investigative or law enforcement officer of the United States," within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.
- 3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant for CRAIG DELEEUW ROBERTSON for violations of 18 U.S.C. § 875(c) (Interstate Threats), 18 U.S.C. § 115(a)(1)(B) (Influencing, Impeding, Retaliating Against Federal Law Enforcement Officers by Threat), and 18 U.S.C. § 871(a) (Threats Against the President), and does not set forth all of my knowledge about this matter. Information developed to date as a result of my investigation and the investigation of others revealed the following:
- 4. On, or about, March 19, 2023, I received a notification, which had come from the FBI National Threat Operations Center ("NTOC"), regarding a threat to life.<sup>1</sup>

  NTOC had received a tip from a social media company ("Company-1") regarding username @winston4eagles posting a threat on Company-1's platform to kill New York

<sup>1</sup> NTOC fields calls and electronic tips from the public.

County District Attorney ("DA") Alvin Bragg. At the time of the post, DA Bragg was overseeing a criminal investigation into former President Donald J. Trump.

The following is a screenshot of the posted threat:



The screenshot shows that User @winston4eagles posted the following true threat:

#### "ALVIN BRAGG

Heading to New York to fulfill my dream of iradicating [sic] another of George Soros two-but political hach [sic] DAs.

I'll be waiting in the courthouse parking garage with my suppressed Smith & Wesson M&P 9mm to smoke a radical fool prosecutor that should never have been elected.

I want to stand over Bragg and put a nice hole in his forehead with my 9mm and watch him twitch as a drop of blood oozes from the hole as his life ebbs away to hell!!

BYE, BYE, TO ANOTHER CORRUPT BASTARD!!!"

- 5. NTOC provided the following information for the person associated with username @winston4eagles: a telephone number, email address, and home addresses all believed to belong to Craig Deleeuw ROBERTSON (hereafter "ROBERTSON"). The email address associated with the @winston4eagles
- 6. On March 19, 2023, I, along with another FBI Special Agent (hereafter "SA-1"), conducted physical surveillance in the vicinity of an address in Provo, Utah where the FBI believed ROBERTSON to reside ("Residence-1"). During surveillance, the following was observed:
  - a. A blue Honda, parked in the driveway of Residence-1, bearing a Utah State

    License Plate number which, based on my review of records, matched a

    vehicle listed as registered to ROBERTSON at Residence-1.
  - b. A heavy-set white male, approximately 70-75 years old, with gray hair, wearing a bright blue jacket, white shirt, and tie (hereafter "UM-1"), walked from the east area of the above listed residence and got into the passenger's side front seat of the Honda.
  - c. ROBERTSON, wearing a dark suit (later observed as having an AR-15 style rifle lapel pin attached), a white shirt, a red tie, and a multi-colored (possibly camouflage) hat bearing the word "TRUMP" on the front, walked from the east area of the residence, and got into the driver's seat of the Honda. ROBERTSON drove the Honda out of the driveway and traveled a

- short distance northbound into the parking lot of a church. ROBERTSON and UM-1 exited the Honda and walked into the church building.
- d. After several hours, UM-1 exited the church building and walked back to Residence-1.
- e. Approximately one hour later, ROBERTSON exited the church building and entered the Honda with another unknown male (hereafter "UM-2").

  ROBERTSON and UM-2 drove out of the parking lot and out of sight.

  Several minutes later, ROBERTSON and UM-2 returned to the church parking lot in the Honda. UM-2 exited the Honda, and ROBERTSON drove to Residence-1.
- 7. After arriving at the residence, SA-1 and I spoke with ROBERTSON outside of the residence. The conversation began when I called out, "Mr. Robertson?" and ROBERTSON responded in the positive.
- 8. After advising ROBERTSON of SA-1's and my identities as Federal Law Enforcement Officers for the FBI, ROBERTSON admitted his username on Company-1 was winston4eagles. When I advised ROBERTSON that we would like to speak with him regarding a comment he had posted on Company-1's social media platform, ROBERTSON stated, "I said it was a dream!" ROBERTSON then said, "We're done here! Don't return without a warrant!"

- 9. A court authorized search of a social media company ("Company-2") account registered to "Craig Robertson," with ROBERTSON's same email address and displaying the name "Craig D. Robertson," showed ROBERTSON was living in Provo, Utah.
- 10. As part of this investigation, I have also reviewed public posts from Company-2's social media platform made by ROBERTSON. Based on my review of those posts by ROBERTSON from that account, I know that ROBERTSON does, in fact, appear to own a sniper rifle and a ghillie suit, has made violent threats to murder public officials, and appears to possess numerous firearms (in addition to what appears to be a long-range sniper rifle). The search also yielded, in part, multiple posts regarding threats, violent acts, firearms, and the possession and use of firearms in furtherance of committing violence against government officials. The posts show ROBERTSON's intent to kill, at a minimum, D.A. Bragg and President Joe Biden. The posts further show ROBERTSON's intent to impede and intimidate SA-1, me, and other FBI special agents while engaged in the performance of our official duties and that ROBERTSON intended to retaliate against the FBI. The following are screenshots of the posts:<sup>2</sup>

<sup>2</sup> The posts are not in chronological order. However, the posts display a date or timeframe of when they were published.



I believe "JOE" refers to United States' President Joseph Biden (POTUS) and "KAMALA" refers to United States' Vice President Kamala Harris (VPOTUS).



I believe "LETITIA JAMES" refers to New York State Attorney General ("AG")
Letitia James and "B/TCH" to be a variation on the spelling of the word
"BITCH".



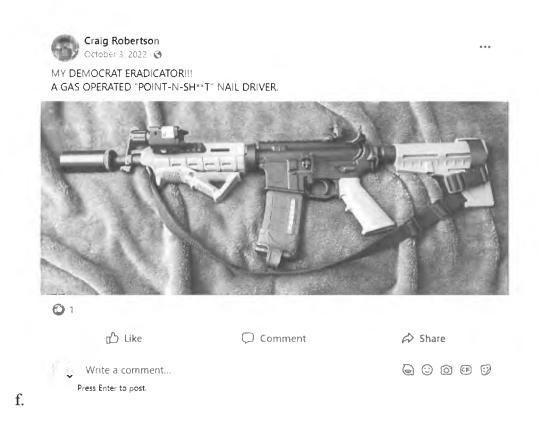
I believe "Heinrick Himler" refers to the former leader of the Nazi Party Heinrich Himmler and "Merrick Garland" refers to United States AG Merrick Garland.



I believe "JOE BIDEN" refers to POTUS and that ROBERTSON intends to bring about the death to President Biden.



I believe "Merrick Garland" refers to AG Garland, "MAGA TRUMPER" refers to a supporter of former United States' President Donald Trump, and "cowards" refers to FBI Speical Weapons and Tactics (SWAT) team members.



I believe "DEMOCRAT ERADICATOR" refers to the pictured semi-automatic rifle as an instrument used to cause death to persons belonging to the Democratic Party.



I believe "BIDEN" refers to POTUS and that ROBERTSON intends to bring about the death to President Biden..



LONG RANGE DEMOCRAT, HIPOCRIT ERADICATOR!!!



I believe "LONG RANGE DEMOCRAT, HIPOCRIT ERADICATOR" refers to the pictured rifle as an instrument used to cause death to persons belonging to the Democratic Party.



I believe "Merrick Garland eradication tool" refers to the pictured semi-automatic handgun as an instrument used to cause death to AG Garland.



I believe "Merrick Garland" refers to AG Garland and "they" refers to FBI speical agents. I believe this is a threat to kill FBI Special Agents who are engaged in an investigation of ROBERTSON. This post shows ROBERTSON's intent to impede, intimidate, and retaliate against SA-1, me, and other FBI special agents.



I believe "Gavin Newsom" refers to the Governer of California, Gavin Newsom and "wound above his brow" refers to a bullet hole in Governer Newsom's forehead.



### WONDERFUL DREAM!!!

I DREAMED I WAS IN A DARK CORNER OF A WASHINGTON D.C. PARKING GARAGE.

I WAS STANDING OVER THE BODY OF THE U.S. ATTORNEY GENERAL, MERRICK GARLAND, WITH A BULLET HOLE DEAD CENTER IN HIS FOREHEAD.

IN MY HAND WAS MY SUPPRESSED SMITH & WESSON M&P 9MM, SMOKE WAFTING FROM THE MUZZLE.

THE STAR SPANGLED BANNER PLAYING QUIETLY IN THE DISTANCE.
I THOUGHT TO MYSELF; "WHAT AN AMAZING, PATRIOTIC MOMENT' AS SHIVERS OF LIBERTY AND FREEDOM SWELLED MY HEART FOR OUR AMAZINGLY GREAT COUNTRY.

**(** 1

1.

I believe this may have been the post ROBERTSON refered to when he told SA-1 and me, "I said it was a dream!"



I believe "Jefferson" refers to former United States' President Thomas Jefferson as depicted on the pictured United States' five-cent coin, and "old Joey" refers to President Biden.



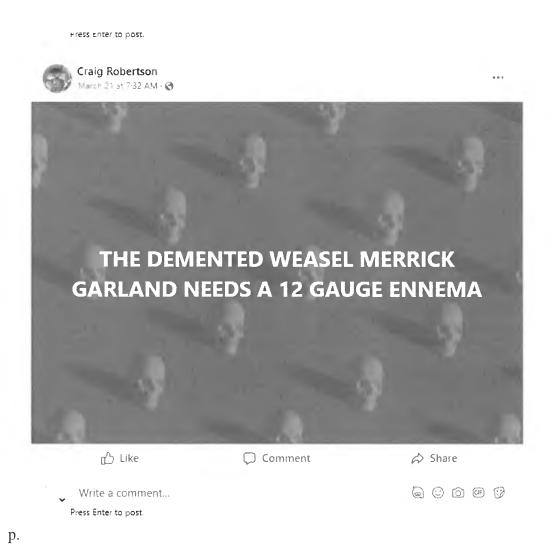
Just getting ready for the 2024 election cycle. They say it's going to be a fight and I want to be ready!!!!! Only have 9, but trying for an even dozen....



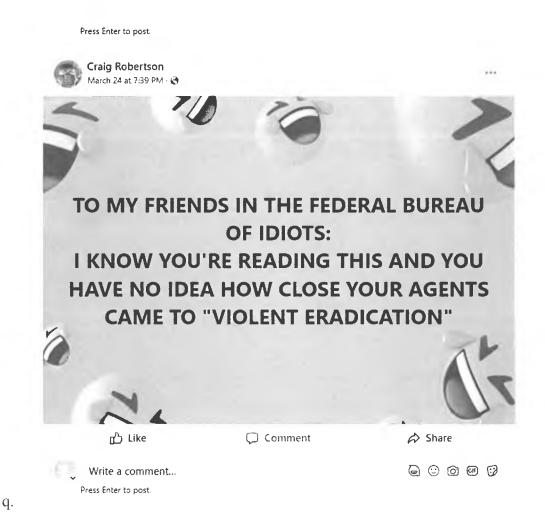
I believe this post refers to ROBERTSON having nine (9) semi-automatic rifles and attempting to obtain three (3) additional semi-automatic rifles in order to be ready for a "fight" during the 2024 election cycle.

	Posts		<b>:</b> Filters	
	Craig Robertson		•••	
	his head. He was still twitching. The Demented Weasel, Merrick Garland post.	watching his life's blood oozing from	ying to prosecute Trump. is life's blood oozing from a 9mm bullet hole in ckboot Nazi FBI to screw with me about the ild conservative who had a dream about an	
	<b>©</b> 1			
	戊分 Like	Comment Comment	⇔ Share	
0.	Milita a com mant		abla	

Because this post was posted on March 21, 2023, subsequent to SA-1 and me speaking with ROBERTSON, I believe "jackboot Nazi FBI" refers to the FBI in general and to SA-1 and me in particular.



I believe "MERRICK GARLAND" refers to AG Garland.

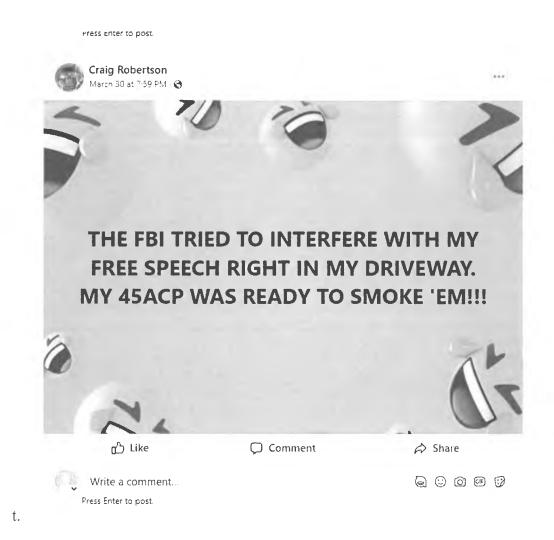


I believe this was posted on or about March 24, 2023. As such, I believe "YOUR AGENTS" refers to SA-1 and me, who spoke with ROBERTSON just five days prior on March 19, 2023, and informed him we were investigating his posting(s) on social media. I believe "VIOLENT ERADICATION" referes to ROBERSTON assaulting and murdering SA-1 and me by shooting us with a firearm. I believe he made this threat with the intent to impede, intimidate, and interfere with FBI special agents engaged in the performance of their official

duties and also had the intent to retaliate against such FBI agents on account of the performance of their official duties.



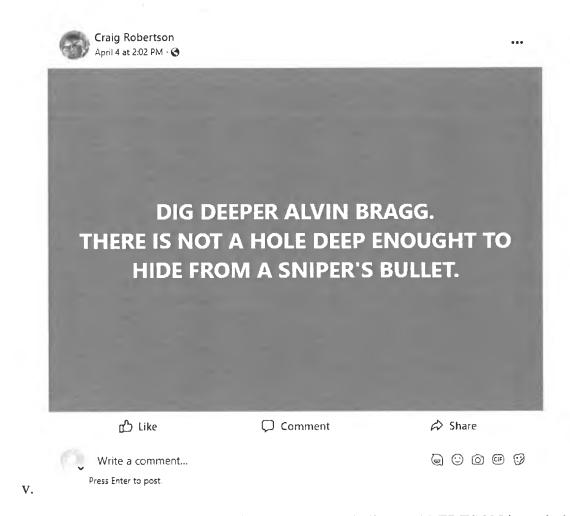
I believe this was posted on March 25, 2023, as it was discovered on March 30, 2023. Additionally, I believe "YOUR AGENTS" refers to SA-1 and me who spoke with ROBERTSON on March 19, 2023, and "BANG' to be referring to being shot. Like the previous posting, I believe he made this threat with the intent to impede, intimidate, and interfere with FBI special agents engaged in the performance of their official duties and also had the intent to retaliate against such FBI agents on account of the performance of their official duties.



I believe "FBI" refers SA-1 and me, "45ACP" refers to a .45 caliber handgun, and "SMOKE 'EM' refers to shooting SA-1 and me.



I believe this was posted by ROBERTSON on Facebook on or about April 11, 2023. I believe "ALVIN" to be referring to DA Bragg and ROBERTSON intended this to be a true threat to shoot DA Bragg with firearm.



I believe "ALVIN BRAGG" is DA Bragg. I believe ROBERTSON intended this to be a true threat to shoot DA Bragg with firearm.



WHEN THIS GOVERNMENT CRUMBLES UNDER ITS OWN EVIL AND CORRUPTION FOOD, WATER, ARMS, AND AMMUNITION WILL BE NECESSARY TO SURVIVE.

NINE WORDS YOU DON'T WANT TO HEAR: "WE'RE FROM THE GOVERNMENT AND WE'RE HERE TO HELP."



w. O 1

I believe this, along with other postings I have reviewed to ROBERTSON's public social media accounts, demonstrate ROBERTSON is in possession of firearms capable of inflicting death and/or bodily injury and that he intends to use these

firearms and ammunition in furtherance of committing crimes of violence as alleged above in Counts 1-3.



I believe this to be a threat of death against FBI special agents if any FBI special agents arrive at ROBERTSON's residence.



I believe this to be a threat of violence against President Biden.







I believe "JOE BIDEN" refers to President Biden, and "PISS" refers to urinating, and "SOBs" refers to "son of a bitch's."



The above post was published on, or about August 6, 2023. President Biden is scheduled to arrive in Utah on August 9, 2023. There have been media stories in Utah about President Biden's upcoming visit. I therefore believe this is knowing and willful true threat to kill or cause injury to President Biden using an M24 sniper rifle while being concealed by a ghillie suit during President Biden's visit to Utah.

Album Hide in Plain Site - I'm just a pile of grass!



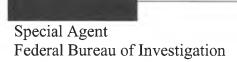


Consistent with ROBERTSON'S threat to kill President Biden above, these posts show ROBERTSON dressed in a ghillie suite demonstrating his ability to conduct sniper tactics. While these postings are somewhat dated, they nevertheless show ROBERTSON has access to a ghillie suit and a long-range rifle. Indeed, ROBERTSON confirmed in his recent threat to kill President Biden from two days ago, that he will get out his "OLD GHILLIE SUIT" and "DUST OFF" his sniper rifle, thus indicating he has been in possession of these items for some time and is still in possession of these items. I believe that ROBERTSON intends to use them to commit crimes of violence discussed in this affidavit.

11. I respectfully request that this Complaint and Affidavit, as it reveals an ongoing investigation, be sealed until further order of the Court in order to avoid premature disclosure of the investigation, guard against flight, and better ensure the safety of agents and others, except that working copies may be served on Special Agents

and other investigative and law enforcement officers, federally deputized state and local law enforcement officers, and other government and contract personnel acting under the supervision of such investigative or law enforcement officers as necessary to effectuate the Court's Order.

12. Based on the foregoing information, I respectfully request that a warrant of arrest be issued for CRAIG DELEEUW ROBERTSON for violations of 18 U.S.C. § 875(c), 18 U.S.C. §§115(a)(1)(B) and 115(b)(4), and 18 U.S.C. § 871(a).



SUBSCRIBED AND SWORN to before me via video-teleconference this 8<sup>th</sup> day of August, 2023.



APPROVED:

TRINA A. HIGGINS United States Attorney

/s/ Cameron P. Warner
Cameron P. Warner
Assistant United States Attorney

# EXHIBIT 8D

## State of Georgia

## County of Fulton

I, Darin Schierbaum, am currently serving as the Chief of Police for the City of Atlanta and have served in that role since June 2022.

I have served as a sworn police officer for the City of Atlanta since 2003.

Prior to joining the Atlanta Police Department, I served as a Deputy Sheriff in in Johnson County, Illinois for approximately ten years.

In August 2023, I became aware that the identities of members of one of the Fulton County Grand Juries serving for the July-August term of court had been listed on a website known to be a location where information for "doxing" people is listed. Those listings called for harassment and violence against the grand jurors.

I was able to determine that members of the Fulton County Grand Jury who returned a true bill of indictment against 19 people, including Defendant Donald J. Trump, on charges of racketeering and other felony allegations, were being contacted by people in harassing and/or threatening manners. The doxing included home addresses of the grand jurors whose names were found on the doxing website.

As a result of determining that doxing had occurred, the Atlanta Police Department enacted an operational plan to protect those that resided in the city of Atlanta. The Atlanta Police Department also contacted the Fulton County Sheriff's Office who in turn coordinated efforts with the other police departments where grand jurors resided outside the City of Atlanta. The Sheriff, the Atlanta Police Department, and other police departments with jurisdiction where grand jurors live coordinated to ensure that safety measures were put in place to prevent harassment and violence against the grand jurors.

On August 30, 2023, the Atlanta Police Department was able to determine that the Fulton County District Attorney and her family were doxed in a similar manner as the grand jurors. The doxing of the District Attorney established it was due to her indictment of Defendant Donald J. Trump.

A website where both the Grand Jurors who returned the indictment against Donald J. J. Trump and the Fulton County District Attorney is operated by a Russian company. They openly state on the website that the reason they are doxing the Fulton County District Attorney and the Grand Jury individuals is due to the indictment of Donald J. Trump.

The Russian company that is housing the doxing has refused to remove doxing information and the Federal Government has been unsuccessful in having such

information removed. Thus, the doxing of both the grand jurors and the District Attorney are permanent.

The actions taken by local law enforcement to protect the grand jurors, as well as the District Attorney and her family members, require a significant devotion of our capacity and represent a strain on law enforcement resources to allow them to complete their civic duty without being subjected to unnecessary danger.

Signed:

Darin Schierbaum

Chief of Police

City of Atlanta

226 Peachtree Street, SW

Atlanta, GA 3030

Subscribed and sworn to before me, this \_\_\_\_\_ day of September, 2023.

Signature of Notary:

Printed Name of Notary:

# EXHIBIT 8E

## AFFIDAVIT OF FULTON COUNTY DISTRICT ATTORNEY'S OFFICE ASSISTANT CHIEF INVESTIGATOR OF THE TECHNOLOGY UNIT, GERALD WALSH

Personally appeared before me, the undersigned officer duly authorized to administer oaths, Gerald Walsh, who first being duly sworn, on oath deposes and states that he is a citizen of the United States, 18 years of age or older, and employed by the Fulton County District Attorney's Office as a P.O.S.T certified peace officer. Affiant further states the following:

I, Assistant Chief Investigator Gerald Walsh conducted in synopsis the following investigation during the period of August 30 to September 1, 2023. I received a complaint on August 30, 2023 in reference to Madam District Attorney Fani T. Willis, being doxed. According to UC Berkeley, Doxxing refers to the collection of a user's private information, across multiple platforms (including social media) by an unauthorized individual, who then publishes the information in an attempt to shame or embarrass the user.

In working with members of the United States Department of Homeland Security (DHS), it was determined that Fani T. Willis is a victim of doxing, and that information was listed about her, her family members by name, ages with dates of birth, home physical addresses, phone numbers (VOIP and wireless), GPS coordinates, places of employment, work physical addresses, email addresses and social media user names. Information was intertwined with derogatory and racist remarks, such as "Degenerate...nigger" and "fuck this stupid bitch" and "bitch is own3d! Trump 2024".

The information was viewed on the dark web utilizing special equipment. The terms deep web and dark web are often interchanged loosely, but there is a difference between them and the surface web. The surface web is what is generally used by everyday users and is indexed. The surface web is where searches such as Google and others are completed by a user. The deep web is utilized by many people for usually non-criminal and legitimate uses such as electronic health records and banking records and is tied to many sites on the surface web. Dark web is where nefarious content is often kept and is not usually indexed or easy to find. One must know where they are going to get to or utilize the information, or systems can be damaged, a virus or malware can be picked up, or a user can just see criminal content that cannot be unseen. Criminals use the dark web for selling or trading illegal substances, firearms and human trafficking to describe a small amount of what is present.

The website where Madam District Attorney Fani T. Willis was being doxed was determined to be hosted in Russia and is known by DHS as to be uncooperative with law enforcement. The users who post on this particular site have doxed other District Attorneys and their families from multiple states, Judges and their families, along with federal employees and their families, and now also members of the Fulton County Grand Jury who voted to indict Former President Donald Trump and their families.

One of the same users that doxed Madam District Attorney Fani T. Willis, doxed the members of the Fulton County Grand Jury on the same site, to include names, home addresses,

phone numbers, relatives, and vehicle information. This user went so far as to say, "...how long would it take for Antifa to show up in their front lawns and work places?"

Due to this information in all likelihood not ever being removed off of the dark web and the owners/hosts of the websites being uncooperative with law enforcement or government process, the members of the Fulton County Grand Juries should have their personal identifiable information protected from access by the general public through the courts. Some information present on the internet regarding Grand Jurors is inaccurate and should not then be corrected or verified by being released by the courts to the general public without measures being taken to minimize potential danger to those who perform their civic duty serving on Grand Juries.

Affiant (signature)

Gerald Walsh

(printed name)

Fulton County District Attorney's Office 136 Pryor Street, 3<sup>rd</sup> Floor Atlanta, GA 30303

Subscribed and sworn to

And notarized by me on this dat

Before me this

day of September, 2023

Notary Public

## EXHIBIT 8F



## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

OCT 2 5 2023

Kevin P. Weimer, Clerk
By
Deputy Clerk

UNITED STATES OF AMERICA

v.

ARTHUR RAY HANSON, II

Criminal Indictment

No. 1:23-CR-0343

UNDER SEAL

THE GRAND JURY CHARGES THAT:

## Introduction

At all times material to this indictment:

- 1. The defendant, ARTHUR RAY HANSON, II, lived in or around Huntsville, Alabama.
- 2. Fani Willis was the elected District Attorney for Fulton County, Georgia, and was investigating a case involving Former President of the United States Donald J. Trump.
- 3. Patrick Labat was the elected Sheriff for Fulton County, Georgia, and was in charge of the operation of the Fulton County Jail where Fulton County criminal defendants are often received into custody and photographed.

## Count One

4. The Grand Jury re-alleges and incorporates by reference the factual allegations contained in paragraphs 1 through 3 of this Indictment as if fully set forth herein.

5. On or about August 6, 2023, in the Northern District of Georgia and elsewhere, the defendant, ARTHUR RAY HANSON, II, consciously disregarding a substantial risk that his communication would be viewed as threatening violence, knowingly transmitted a communication in interstate and foreign commerce, from the State of Alabama to the State of Georgia, that contained a threat to injure Fulton County Sheriff Patrick Labat; specifically, HANSON called the Fulton County Government customer service line and left a voicemail message for Sheriff Labat in which HANSON made statements, which included, but were not limited to, the following: "if you think you gonna take a mugshot of my President Donald Trump and it's gonna be ok, you gonna find out that after you take that mugshot, some bad shit's probably gonna happen to you;" "if you take a mugshot of the President and you're the reason it happened, some bad shit's gonna happen to you;" "I'm warning you right now before you fuck up your life and get hurt real bad;" "whether you got a goddamn badge or not ain't gonna help you none;" and "you gonna get fucked up you keep fucking with my President."

All in violation of Title 18, United States Code, Section 875(c).

## **Count Two**

- 6. The Grand Jury re-alleges and incorporates by reference the factual allegations contained in paragraphs 1 through 3 of this Indictment as if fully set forth herein.
- 7. On or about August 6, 2023, in the Northern District of Georgia and elsewhere, the defendant, ARTHUR RAY HANSON, II, consciously disregarding

a substantial risk that his communication would be viewed as threatening violence, knowingly transmitted a communication in interstate and foreign commerce, from the State of Alabama to the State of Georgia, that contained a threat to injure Fulton County District Attorney Fani Willis; specifically, HANSON called the Fulton County Government customer service line and left a voicemail message for District Attorney Willis in which HANSON made statements, which included, but were not limited to, the following: "watch it when you're going to the car at night, when you're going into your house, watch everywhere that you're going;" "I would be very afraid if I were you because you can't be around people all the time that are going to protect you;" "there's gonna be moments when you're gonna be vulnerable;" "when you charge Trump on that fourth indictment, anytime you're alone, be looking over your shoulder;" and "what you put out there, bitch, comes back at you ten times harder, and don't ever forget it."

All in violation of Title 18, United States Code, Section 875(c).

A 10-25-23
Reconst Heaventon

RYAN K. BUCHANAN *United States Attorney* 

BRET R. HOBSON

Assistant United States Attorney

Georgia Bar No. 882520

BRENT ALAN GRAY

Assistant United States Attorney

Georgia Bar No. 155089

600 U.S. Courthouse

75 Ted Turner Drive SW

Atlanta, GA 30303

404-581-6000; Fax: 404-581-6181

# EXHIBIT 9A

### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA \*

\*

v. \* CRIMINAL NO. 23-cr-257 (TSC)

\*

DONALD J. TRUMP,

\*

Defendant. \*

\*

### GOVERNMENT'S OPPOSED MOTION TO ENSURE THAT EXTRAJUDICIAL STATEMENTS DO NOT PREJUDICE THESE PROCEEDINGS

Since the grand jury returned an indictment in this case, the defendant has repeatedly and widely disseminated public statements attacking the citizens of the District of Columbia, the Court, prosecutors, and prospective witnesses. Through his statements, the defendant threatens to undermine the integrity of these proceedings and prejudice the jury pool, in contravention of the "undeviating rule" that in our justice system a jury's verdict is to "be induced only by evidence and argument in open court, and not by any outside influence." *Sheppard v. Maxwell*, 384 U.S. 333, 351 (1966) (quotations omitted). In accordance with the Court's duty to "protect [its] processes from prejudicial outside interferences," *id.* at 363, the Government requests that the Court take the following immediate measures to ensure the due administration of justice and a fair and impartial jury: (1) enter a narrowly tailored order pursuant to Local Criminal Rule 57.7(c) that restricts certain prejudicial extrajudicial statements; and (2) enter an order through which the Court can ensure that if either party conducts a jury study involving contact with the citizens of this District, the jury study is conducted in a way that will not prejudice the venire. The Government obtained the defendant's position from counsel for the defendant, and he opposes this motion.

#### I. Background

As set forth in the indictment, after election day in 2020, the defendant launched a disinformation campaign in which he publicly and widely broadcast knowingly false claims that there had been outcome-determinative fraud in the presidential election, and that he had actually won. ECF No. 1 at ¶¶ 2, 4. In service of his criminal conspiracies, through false public statements, the defendant sought to erode public faith in the administration of the election and intimidate individuals who refuted his lies. ECF No. 1 at ¶¶ 2, 28, 31-32, 42, 44, 74, 97, 100, 104, 111. The defendant is now attempting to do the same thing in this criminal case—to undermine confidence in the criminal justice system and prejudice the jury pool through disparaging and inflammatory attacks on the citizens of this District, the Court, prosecutors, and prospective witnesses. The defendant's conduct presents a "substantial likelihood of material prejudice" to these proceedings, and the Court can and should take steps to restrict such harmful extrajudicial statements. *Gentile* v. State Bar of Nevada, 501 U.S. 1030, 1075 (1991).

## A. The Defendant Has a History of Inflammatory and Misleading Statements That He Knew or Should Have Known Would Cause Others to Harass and Harm Perceived Critics or Adversaries

The defendant has an established practice of issuing inflammatory public statements targeted at individuals or institutions that present an obstacle or challenge to him. In the period between the presidential election on November 3, 2020, and the congressional certification proceeding on January 6, 2021, the defendant trained his focus on the election system, including election officials and other individuals carrying out civic duties to implement fair elections in various states. As a result, the defendant engendered widespread mistrust in the administration of the election, and the individuals whom he targeted were subject to threats and harassment.

Examples of this pattern, from the indictment and the Government's investigation, include the following:

whom the defendant specifically targeted had publicly stated that there was on the social media platform Twitter because See ECF 1, Indictment, ¶ no evidence of election fraud. No. 42; https://twitter.com/realDonaldTrump/status/1326525851752656898. the defendant's tweet. observed an increase in the volume and severity of threats against him and his family. See House Select Committee to Investigate the January 6<sup>th</sup> Attack on the United States Capitol ("House Select Committee"), 6/13/22 Hr'g, at 1:47:14 1:47:43 ("After the President tweeted at me by name, calling me out the way that he did, the threats became much more specific, much more graphic, and included not just me by name but included members of my family by name, their ages, our address, pictures of our home. Just every bit of detail that you could imagine. That was what changed with that tweet.").1

during the 2020 election, whose home address was listed on the internet and whose family was threatened with violence after the defendant and surrogates publicly derogated for certifying the election. *See* Exhibit 1 at 3-6.

election, who received threatening communications after certified the election and the defendant issued public posts about them. See Exhibit 1 at 26-27 (

who required additional police protection after the defendant targeted on Twitter for rejecting one of the defendant's election challenges. See Exhibit 1 at 41-44.

The defendant knows that when he publicly attacks individuals and institutions, he inspires others to perpetrate threats and harassment against his targets. On December 1, 2020, as the defendant was fueling an intense national atmosphere of mistrust and anger regarding the election, a Georgia election official held a widely televised press conference in which he pleaded with the

<sup>&</sup>lt;sup>1</sup> See https://january6th-benniethompson.house.gov/legislation/hearings/06132022-select-committee-hearing.

defendant to stop, stating that if he did not, "Someone's going to get hurt, someone's going to get shot, someone's going to get killed." The defendant did not stop. Instead, he continued—even to the present—to attack individuals whom he knows already suffered threats and harassment as a result of his words. For instance:

- On November 17, 2020, the defendant fired pepartment of Homeland Security's Cybersecurity and Infrastructure Security Agency after made statements assuring the public of the integrity of the election. See ECF No. 1 ¶ 11(d). Later that month, after appeared on a news program and again stated publicly that the presidential election had been secure, the defendant attacked him on Twitter, and on November 30, an agent of the defendant publicly stated that "should be drawn and quartered. Taken out at dawn and shot." This statement was so dangerous that the above-described Georgia election official mentioned it in his press conference when warning the defendant and others that such rhetoric would lead to violence. and his family received death threats and had to evacuate their home, and through a December 8, 2020 lawsuit put the defendant on explicit notice of the threats and harassment the defendant had caused. The defendant continued to publicly attack anyway.
- In 2020, the defendant and co-conspirators spread false accusations of misconduct against a Georgia election worker, and a result, a were inundated by threats. See ECF No. 1 ¶ 26. subsequently described the pernicious threats and intimidation she endured as a result of these false allegations in an interview with the House Select Committee, which publicly released a transcript of the interview on December 29, 2022. See Select Committee Press

<sup>&</sup>lt;sup>2</sup> See NBC News, Georgia Secretary of State Press Conference (Dec. 1, 2020), https://www.youtube.com/watch?v=nH9FnY0qvNI.

<sup>&</sup>lt;sup>3</sup> See CBC News, 60 Minutes (Nov. 29, 2020), https://www.cbsnews.com/news/election-results-security-chris-krebs-60-minutes-2020-11-29/; Newsmax, Howie Carr Radio Show (Nov. 30, 2020).

<sup>&</sup>lt;sup>4</sup> See NBC News, Georgia Secretary of State Press Conference (Dec. 1, 2020), https://www.youtube.com/watch?v=nH9FnY0qvNI.

<sup>&</sup>lt;sup>5</sup> See Case No. 484243V (Montgomery County, Maryland Circuit Court), Complaint (Dec. 8, 2020).

<sup>&</sup>lt;sup>6</sup> A court in this District recently entered a default judgment against one of the defendant's co-conspirators in a lawsuit filed against him by for his defamatory false claims. *See* 21-cv-3354 (BAH), ECF No. 93, Order (Aug. 30, 2023).

Release, Release of Select Committee Materials (Dec. 29, 2022); Select Committee Transcript at 8 ("Do you know how it feels to have the President of the United States to target you? The President of the United States is supposed to represent every American, not to target one. But he targeted me . . . a small-business owner, a mother, a proud American citizen who stood up to help Fulton County run an election in the middle of the pandemic. . . . And, lo and behold, when someone as powerful as the President of the United States eggs on a mob, that mob will come. They came for us with their cruelty, their threats, their racism, and their hats. They haven't stopped even today."). Within ten days of the public release of interview transcript, the defendant—despite the known threats the election worker had received, and the established falsity of the claims of misconduct—publicly attacked again on Truth Social through a series of repeated false claims.

Likewise, the defendant recently renewed attacks on former Georgia Lieutenant Governor , whose harassment the defendant inspired in the aftermath of the election. In December 2020, after Georgia's Governor and Lieutenant Governor rejected the defendant's calls to appoint the defendant's illegitimate electors in Georgia, the defendant issued a post labeling a "Rino Never Trumper" who was "dumb or corrupt" and need every "We great Georgian to call him https://twitter.com/realDonaldTrump/status/ 1336148836495069185. Thereafter, reported, he received death threats. 10 Nonetheless, last month, on August 14, 2023, when it was publicly reported that had been called to testify before a state grand jury in Fulton County, Georgia, the defendant posted on Truth Social that "[h]e shouldn't" testify. See https://truthsocial.com/@realDonaldTrump/posts/110888087440060991.

The defendant continues these attacks on individuals precisely because he knows that in doing so, he is able to roil the public and marshal and prompt his supporters. As he acknowledged in a televised town hall on May 10, 2023, his supporters listen to him "like no one else."

<sup>&</sup>lt;sup>7</sup> See https://january6th-benniethompson.house.gov/news/press-releases/release-select-committee-materials-4.

https://january6th-benniethompson.house.gov/sites/democrats.january6th.house.gov/files/20220531 .pdf.

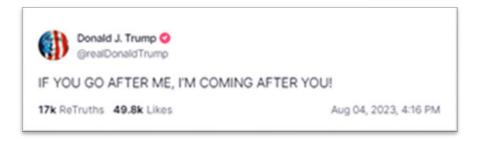
https://truthsocial.com/@realDonaldTrump/posts/109623460421938942; https://truthsocial.com/@realDonaldTrump/posts/109623536630848334; https://truthsocial.com/@realDonaldTrump/posts/109623623674619588.

<sup>&</sup>lt;sup>10</sup> MSNBC, Morning Joe, https://www.msnbc.com/morning-joe/watch/georgia-s-lieutenant-governor-won-t-seek-reelection-turns-focus-to-gop-2-0-112276037799.

<sup>&</sup>lt;sup>11</sup> See CNN, Transcript of CNN's Town Hall with Former President Donald Trump (May 11, 2023), https://www.cnn.com/2023/05/11/politics/transcript-cnn-town-hall-trump/index.html.

## B. Since the Indictment, the Defendant Has Deployed Misleading and Inflammatory Statements About this Case to Undermine Confidence in the Justice System and Prejudice the Jury Pool

The defendant made clear his intent to issue public attacks related to this case when, the day after his arraignment, he posted a threatening message on Truth Social:



And he has made good on his threat. Since the indictment in this case, the defendant has spread disparaging and inflammatory public posts on Truth Social on a near-daily basis regarding the citizens of the District of Columbia, the Court, prosecutors, and prospective witnesses. Like his previous public disinformation campaign regarding the 2020 presidential election, the defendant's recent extrajudicial statements are intended to undermine public confidence in an institution—the judicial system—and to undermine confidence in and intimidate individuals—the Court, the jury pool, witnesses, and prosecutors. Below are select examples of the defendant's disparaging and inflammatory Truth Social posts.

i. <u>Posts Attacking, Undermining, and Attempting to Intimidate the Court and the Jury Pool</u>

The defendant has posted repeated, inflammatory attacks on the judicial system, the Court, and the citizens of the District of Columbia who comprise the jury pool in this case. The defendant has made baseless claims—cited or inserted below—that the justice system is "rigged" against him; that the Court is "a fraud dressed up as a judge in Washington, D.C. who is a radical Obama

<sup>&</sup>lt;sup>12</sup> See https://truthsocial.com/@realDonaldTrump/posts/110857162338915853.

hack" or is a "biased, Trump-hating judge"; <sup>13</sup> and that he cannot get a fair trial from the residents of this "filthy and crime ridden" District that "is over 95% anti-Trump." <sup>14</sup>



The Obama appointed Judge in the FREE SPEECH Indictment of me by my political opponent, Crooked Joe Biden's Department of InJustice, shared professional ties at the law firm that worked for Energy Company Burisma, based in Ukraine, of which Hunter Biden and his associate were "proud" MEMBERS OF THE BOARD, and were paid Millions of Dollars, even though Hunter knew almost NOTHING about Energy. How much was the law firm paid? So Horrible. This is a CLASSIC Conflict of Interest! "GATEWAY PUNDIT"

6.85k ReTruths 19.6k Likes

Aug 08, 2023, 4:47 PM



THERE IS NO WAY I CAN GET A FAIR TRIAL WITH THE JUDGE "ASSIGNED" TO THE RIDICULOUS FREEDOM OF SPEECH/FAIR ELECTIONS CASE. EVERYBODY KNOWS THIS, AND SO DOES SHE! WE WILL BE IMMEDIATELY ASKING FOR RECUSAL OF THIS JUDGE ON VERY POWERFUL GROUNDS, AND LIKEWISE FOR VENUE CHANGE, OUT IF D.C.

11.2k ReTruths 42.6k Likes

Aug 06, 2023, 9:26 AM

<sup>&</sup>lt;sup>13</sup> See re-post of https://truthsocial.com/@marklevinshow/posts/110973488250507373; https://truthsocial.com/@realDonaldTrump/posts/110980188106641474.

<sup>&</sup>lt;sup>14</sup> See https://truthsocial.com/@realDonaldTrump/posts/110823476578708544.



NO WAY I CAN GET A FAIR TRIAL, OR EVEN CLOSE TO A FAIR TRIAL, IN WASHINGTON, D.C. THERE ARE MANY REASONS FOR THIS, BUT JUST ONE IS THAT I AM CALLING FOR A FEDERAL TAKEOVER OF THIS FILTHY AND CRIME RIDDEN EMBARRASSMENT TO OUR NATION, WHERE MURDERS HAVE JUST SHATTERED THE ALL TIME RECORD, OTHER VIOLENT CRIMES HAVE NEVER NEEN WORSE, AND TOURISTS HAVE FLED. THE FEDERAL TAKEOVER IS VERY UNPOPULAR WITH POTENTIAL AREA JURORS, BUT NECESSARY FOR SAFETY, GREATNESS, & FOR ALL THE WORLD TO SEE!

7.43k ReTruths 27.2k Likes

Aug 06, 2023, 9:06 AM

### ii. Posts Attacking, Undermining, and Attempting to Intimidate Prosecutors

Similarly, the defendant has posted false and disparaging claims regarding the Department of Justice and prosecutors in the Special Counsel's Office in an attempt to undermine confidence in the justice system and prejudice the jury pool against the Government in advance of trial. In a video posted to Truth Social, the defendant called the Special Counsel's Office a "team of thugs." <sup>15</sup>



WE HAVE A DEPARTMENT OF INJUSTICE RIGGING THE ELECTION FOR CROOKED JOE BIDEN. UNLESS IT IS QUICKLY STOPPED, ALL FUTURE ELECTIONS WILL FOLLOW THE SAME PATH!

9.51k ReTruths 30.6k Likes

Aug 21, 2023, 8:38 AM

<sup>&</sup>lt;sup>15</sup> See https://truthsocial.com/@realDonaldTrump/posts/110980188106641474.



Recently, the defendant has spread knowingly false accusations of misconduct against a prosecutor in the Special Counsel's Office working on the case in which the defendant was indicted in the Southern District of Florida in June 2023, *see United States v. Donald J. Trump, et al*, Case No. 9:23-cr-80101-AMC, ECF No. 30 at 1 (S.D. Fla. June 21, 2023), and connected those false accusations to this case in the District of Columbia by calling the Court a "biased, Trump Hating Judge," as shown below. In his posts on this topic, the defendant repeatedly makes the knowingly false claim that Special Counsel's Office prosecutors went to the White House in advance of the defendant's June 2023 indictment for improper reasons.





It has just been reported that aides to TRUMP prosecutor,
Deranged Jack Smith, met with high officials at the White House
just prior to these political SleazeBags Indicating me OVER
NOTHING. If this is so, which it is, that means that Biden and his
Fascist Thugs knew and APPROVED of this Country dividing
Form of Election Interference, despite their insisting that they
"knew nothing." It's all a BIG LIE, just like Russia, Russia, Russia, &
not knowing about son's business dealings. DISMISS CASE!

8.52k ReTruths 28.2k Likes

Aug 28, 2023, 8:07 AM

In fact, as the defendant well knows from the formal FBI FD-302 interview report and agent notes that he received in discovery on June 21, 2023, in the Southern District of Florida case, on March 31, 2023, the Special Counsel's Office prosecutor conducted a routine investigative interview of a career military official at that official's duty station—the White House. The defendant's objective in spreading a knowing lie to the contrary—including by re-posting others' Truth Social posts naming the prosecutor and repeating the lie<sup>16</sup>—is an attempt to prejudice the public and the venire in advance of trial.

With that same goal, the defendant has posted misleading claims on Truth Social to insinuate misconduct by the Special Counsel's Office in pursuing ordinary court-approved process or seeking the indictment in this case. Regarding a search warrant and non-disclosure order that the Government received from the court consistent with the law, for instance, the defendant falsely claimed that the Special Counsel's Office broke into his former Twitter account<sup>17</sup> in a "major 'hit' on my civil rights" and queried whether the Special Counsel directed the Select Committee to

<sup>&</sup>lt;sup>16</sup> On August 28, the defendant re-posted a Truth Social post doing exactly this. *See* https://truthsocial.com/@marklevinshow/110969978988667723.

<sup>&</sup>lt;sup>17</sup> See https://truthsocial.com/@realDonaldTrump/posts/110886100439412597.

"DESTROY & DELETE all evidence." And on August 2, the defendant posted a quote alleging, without any basis, that the indictment that a federal grand jury in this case returned had been directed by the sitting president: "Joe Biden directed his Attorney General to prosecute his rival. This is not an independent Justice Department, this is not an independent special counsel. This is being directed by the Commander-in-Chief." Through such posts, the defendant is attempting to submit his false and inflammatory claims to the public and jury pool outside of court, because he knows that any such claims made before the Court in the form of motions to suppress or of vindictive prosecution will fail because they must be supported by evidence—of which there is none.

#### iii. Posts Bolstering or Attacking and Attempting to Intimidate Witnesses

The defendant has also posted publicly about individuals whom he has reason to believe will be witnesses in this trial. For instance, on August 30, the defendant posted a video attacking the former Attorney General of the United States, a potential witness in this case, on the very subject of his testimony.<sup>20</sup> Steadily since indictment, the defendant has publicly bolstered certain prospective witnesses in this case, while attacking others, in an effort to influence the public's and the jury pool's impressions of potential witnesses outside of the courtroom. Examples of such posts are below.

<sup>&</sup>lt;sup>18</sup> See https://truthsocial.com/@realDonaldTrump/posts/110860965885418709.

<sup>&</sup>lt;sup>19</sup> See https://truthsocial.com/@realDonaldTrump/posts/110823008009285486.

<sup>&</sup>lt;sup>20</sup> See https://truthsocial.com/@realDonaldTrump/posts/110980538393058556.



The greatest Mayor in the history of New York City was just ARRESTED in Atlanta, Georgia, because he fought for Election Integrity. THE ELECTION WAS RIGGED & STOLLEN. HOW SAD FOR OUR COUNTRY. MAGA!

11.8k ReTruths 39.1k Likes

Aug 23, 2023, 5:00 PM



WOW, it's finally happened! Liddle' Mike Pence, a man who was about to be ousted as Governor Indiana until I came along and made him V.P., has gone to the Dark Side. I never told a newly emboldened (not based on his 2% poll numbers!) Pence to put me above the Constitution, or that Mike was "too honest." He's delusional, and now he wants to show he's a tough guy. I once read a major magazine article on Mike. It said he was not a very good person. I was surprised, but the article was right. Sad!

10.1k ReTruths 34k Likes

Aug 05, 2023, 5:20 PM

### C. The Defendant's Public Posts Regarding this Case are Reasonably Likely to Prejudice the Jury Pool

The defendant's relentless public posts marshaling anger and mistrust in the justice system, the Court, and prosecutors have already influenced the public. For instance, on August 5, 2023, an individual was arrested because she called the Court's chambers and made racist death threats to the Court that were tied to the Court's role in presiding over the defendant's case. *See United States v. Shry*, Case No. 4:23-mj-1602, ECF No. 1 at 3 (Criminal Complaint) (S.D. Tex. August 11, 2023). In addition, the Special Counsel has been subject to multiple threats, and the specific Special Counsel's Office prosecutor that the defendant has targeted through recent, inflammatory public posts has been subject to intimidating communications. Given the defendant's history described above and the nature of the threats to the Court and to the Government, it is clear that

the threats are prompted by the defendant's repeated and relentless posts. To the extent that the defendant's public posts reach the general public, they also reach the jury pool for this trial.

In addition, if unfettered, the way that the defendant is known to use public statements to intimidate individuals could affect potential jurors. A recent incident in this District illustrates the potential issue. Last week, in a trial against a self-professed supporter of the defendant who claimed to have been at the United States Capitol on January 6 because of the defendant's tweets, the jury sent the court a note expressing concern that the trial defendant (Fellows) might have information about the identity of jurors. *See United States v. Brandon Fellows*, Case No. 21-cr-83 (TNM) at ECF No. 141, Note ("We wanted to confirm that the defendent [sic] does not have any personal information on individual jurors, since he was defending himself. Includes name, address, etc."). This demonstrates the need to protect potential jurors from fear of threats and harassment that stem from the defendant's disparaging and inflammatory public statements.

### II. The Court Should Ensure That Public Statements by the Defendant and His Agents Do Not Prejudice These Criminal Proceedings

The defendant's repeated, inflammatory public statements regarding the District of Columbia, the Court, prosecutors, and potential witnesses are substantially likely to materially prejudice the jury pool, create fear among potential jurors, and result in threats or harassment to individuals he singles out. Put simply, those involved in the criminal justice process who read and hear the defendant's disparaging and inflammatory messages (from court personnel, to prosecutors, to witnesses, to potential jurors) may reasonably fear that they could be the next targets of the defendant's attacks. To protect the due administration of justice in these proceedings and ensure the impartiality of the venire, the Government proposes two narrowly tailored orders that impose modest, permissible restrictions on prejudicial extrajudicial conduct by the parties and counsel.

### A. The Court Should Issue an Order Pursuant to Local Criminal Rule 57.7(c) That Prohibits Certain Narrowly Defined Statements

The Court has recognized its "obligation to prevent what the Supreme Court called in *Sheppard v. Maxwell* 'a carnival atmosphere of unchecked publicity and trial by media rather than our constitutionally established system of trial by impartial jury." 8/11/23 Hr'g Tr. at 71. To fulfill that obligation, the Court may "take such steps by rule and regulation that will protect their processes from prejudicial outside interferences," including by "proscrib[ing] extrajudicial statements by any lawyer, party, witness, or court official which divulge[s] prejudicial matters." *Sheppard v. Maxwell*, 384 U.S. 333, 361 (1966). Consistent with these principles, the Court should enter an order pursuant to this District's Local Criminal Rules imposing limited restrictions on certain extrajudicial public statements by the parties and attorneys in this case.

Local Criminal Rule 57.7 permits the Court, "[i]n a widely publicized or sensational criminal case," upon a motion or *sua sponte*, to "issue a special order governing such matters as extrajudicial statements by parties, witnesses and attorneys likely to interfere with the rights of the accused to a fair trial by an impartial jury." LCrR 57.7(c); *see also* LCrR 57.7(b)(1), (3) (prohibiting pre-trial, public statements by lawyers that might prejudice the due administration of justice). Courts in this District have exercised their authority under Local Criminal Rule 57.7(c) to issue orders restricting statements of counsel and parties in appropriate cases. *See United States v. Stone*, No. 19-cr-18, ECF No. 36 at 3 (D.D.C. Feb. 15, 2019) (ordering, *inter alia*, attorneys to "refrain from making statements to the media or in public settings that pose a substantial likelihood of material prejudice to this case"); *United States v. Butina*, No. 18-cr-218, ECF No. 31 at 2 (D.D.C. Sept. 12, 2018) (ordering "all interested participants, in the matter, including the parties, any potential witnesses, and counsel for the parties and witnesses . . . to refrain from making statements to the media or in public settings that pose a substantial likelihood of material prejudice

to this case"). Other jurisdictions are in accord. *See United States v. Brown*, 218 F.3d 415, 428 (5th Cir. 2000) (upholding district court order restricting extrajudicial statements, and reasoning that the rationale of *Gentile* applies equally to attorneys and parties).

The Government seeks a narrow, well-defined restriction that is targeted at extrajudicial statements that present a serious and substantial danger of materially prejudicing this case. The Government's proposed order specifies that such statements would include (a) statements regarding the identity, testimony, or credibility of prospective witnesses; and (b) statements about any party, witness, attorney, court personnel, or potential jurors that are disparaging and inflammatory, or intimidating. *See* Exhibit 2. The Government's order also specifies that, consistent with other clarifications in Local Criminal Rule 57.7, the order is not intended to prohibit quotation or reference to public court records of the case or the defendant's proclamations of innocence. *Id.* This proposal is consistent with the permissible balance approved by the Supreme Court in *Gentile*, 501 U.S. at 1074-75, and specific enough to provide adequate notice to the parties and counsel of prohibited statements.

The defendant's past conduct, including conduct that has taken place after and as a direct result of the indictment in this case, amply demonstrates the need for this order. As illustrated by the examples discussed above, the defendant's statements reasonably could have a material impact on the impartiality of the jury pool while simultaneously influencing witness testimony. The defendant's repeated posts that he cannot receive a fair trial from this Court or from a jury of his peers in this District are substantially likely to undermine confidence in the justice system, affect the jury pool, or otherwise prejudice the due administration of justice. His misleading statements regarding the Special Counsel's Office and its investigation are designed to do the same. And his

targeting of specific witnesses seeks to either bolster or impeach witnesses not before this Court but instead in the court of public opinion before trial begins.

A supplemental order that extends some of the prohibitions that apply to defense counsel to the defendant himself is particularly warranted. Shortly after the indictment in this case was unsealed, the defendant's lead counsel began a series of lengthy and detailed interviews in which he potentially tainted the jury pool by disseminating information and opinions about the case and a potential witness and described in detail legal defenses that he plans to mount, including defenses that may never be raised in court or that may be rejected by the Court before ever reaching the jury.<sup>21</sup> Many of these statements by lead counsel violated Local Criminal Rule 57.7(b), which prohibits attorneys from releasing public extrajudicial statements regarding, among other things, "the identity, testimony, or credibility of prospective witnesses" and the "merits of the case or the evidence in the case." In the time since the Court admonished the parties and counsel at the hearing regarding the motion for a protective order on August 11, 2023, *see* 8/11/23 Hr'g Tr. at 72, the Government is unaware of lead counsel making any additional public statements of this nature. The defendant, however, has persisted. The Court should therefore enter the order proposed by

<sup>&</sup>lt;sup>21</sup> See, e.g., CNN (August 1, 2023), https://www.youtube.com/watch?v=GW7Bixvkpc0; NPR (August 2, 2023), https://www.npr.org/2023/08/02/1191627739/trump-charges-indictmentattorney-jan-6-probe; CNN (August 6, 2023), https://www.cnn.com/videos/politics/2023/08/06/sotu-lauro-full.cnn; ABC, This Week (August 6, https://abcnews.go.com/ThisWeek/video/mike-pence-best-witnesses-trial-john-lauro-102054360; NBC, Meet the Press (August 6, 2023), https://www.nbcnews.com/meet-thepress/video/august-6-john-lauro-and-rep-jamie-raskin-190118469904; CBS, Face the Nation (August 6, 2023), https://www.cbsnews.com/video/face-the-nation-lauro-phillips-krebs/; Fox, Fox News Sunday (August 6, 2023), https://www.foxnews.com/video/6332525513112; CBS, Face the Nation (August 6, 2023); For the Defense with David Oscar Marcus (August 6, 2023), https://podcasts.apple.com/us/podcast/john-lauro-for-donald-jtrump/id1536699806?i=1000623609326.

the Government to ensure the defendant does not undermine the integrity of these proceedings by disseminating statements defense counsel cannot make.

## B. The Court Should Issue an Order That Prohibits Contacting the Citizens of This District to Conduct Jury Studies Without First Notifying and Receiving Authorization from the Court

The Court has already taken steps to protect the venire related to polling of prospective jurors related to this case. At the status hearing on August 28, 2023, after the Government raised the issue of jury studies, and the defense suggested they may "sooner rather than later" conduct outreach to the jury pool to gather information for a potential change of venue motion, the Court instructed the defendant to notify the Court *ex parte* before conducting any polling in the District of Columbia in connection with a potential motion to change the trial venue. *See* 8/18/23 Hr'g Tr. at 59-60. In so doing, the Court noted that such polling "might affect the same jury pool you are claiming is not fair" and might "actually affect their ability to render a fair verdict by virtue of the kinds of questions you're asking, because questions can be phrased in all kinds of ways." *Id*.

Because of the potential prejudice that polling may cause, the Government respectfully requests that the Court set forth a process to review efforts by either party to engage in contacts with members of the jury venire in this District undertaken for the purpose of discussing case-specific facts, including any pretrial survey, poll, focus group, or similar study (hereinafter, "jury study"). Specifically, the Court should (1) require either party to notify the Court before the party—or any individual or entity acting at the party's direction or under its control—undertakes any jury study in this District; (2) require the completion of any such jury study no later than 30 days before jury selection begins; (3) require either party to submit the proposed questions and

<sup>&</sup>lt;sup>22</sup> At a later date, the Government intends to file a motion regarding other issues related to the jury, including the use of a juror questionnaire.

methodology *ex parte* for the Court's review before undertaking any jury study; and (4) require filing under seal of the name and address of each participant contacted in any jury study at least two weeks before jury selection. A proposed order is attached as Exhibit 3.

Such an order is consistent with the Court's inherent authority to protect the "integrity and fairness" of the judicial system through preventing "comments that are likely to prejudice the jury venire." Gentile, 501 U.S. at 1075. Though pretrial surveys are neither inherently suspect nor uncommon in trial litigation, see Brewer v. Lennox Hearth Prods., LLC, 601 S.W.3d 704, 717 (Tex. 2020); see also Ellen Kreitzberg & Mary Procaccio-Flowers, The Law, Art & Science of Selecting a Jury § 3:3 (2022) (noting the utility of pretrial surveys), courts nonetheless maintain the authority to supervise and oversee their use. See United States v. Collins, 972 F.2d 1385, 1398 (5th Cir. 1992) (district court reviewed materials related to Government's polling to determine whether it had compromised the integrity of jury selection); Brewer v. Lennox Hearth Prod., LLC, 546 S.W.3d 866, 877 (Tex. App. 2018) (finding that pretrial surveys are "subject to review by the presiding court in order to determine whether anything was done to compromise the integrity of the jury selection process"), rev'd on other grounds, 601 S.W.3d 704 (Tex. 2020). If questions in a pretrial survey are worded to advocate for a certain party's position, or test the effectiveness of a party's message in addition to gathering information, they can have a potentially prejudicial effect. See Brewer, 601 S.W.3d at 726 ("A campaign of disinformation, in whatever form, undermines the sanctity of the judicial process and is inimical to the constitutional promise of a fair and impartial jury trial.); cf. United States v. Haldeman, 559 F.2d 31, 64 n.43 (D.C. Cir. 1976) (finding that the district court did not err in relying more on comprehensive voir dire than "a poll taken in private by private pollsters and paid for by one side").

To guard against the damage that a pretrial survey could inflict on the venire—whether

intentionally or not—this Court should exercise its inherent authority here. At least one district

court has a standing order that requires the parties to provide advance notification "[w]hen the

party decides that it will, or is likely to, commission" a pretrial mock trial, focus group, or similar

study of the jury venire. See The Honorable Ron Clark, E.D. Tex. Standing Order RC-47 (Aug.

11, 2010). An order of this type "do[es] not *prohibit* use of surveys as a litigation tool" but instead

"regulate[s] the practice . . . by (1) requir[ing] pretrial notice of intent to conduct such a study; (2)

requir[ing] disclosure . . . of the methodology; (3) temporally limit[ing] proximity to trial; and (4)

requir[ing] in camera submission of each participant's name and address in advance of the pre-

trial conference." Brewer, 601 S.W.3d at 726 (emphasis in original). The Government has

attached a proposed order that contains these features.

III. Conclusion

Consistent with its obligations to guard the integrity of these proceedings and prevent

prejudice to the jury pool, while respecting the defendant's First Amendment rights, the Court

should enter the proposed orders imposing certain narrow restrictions on the parties' public

statements regarding this case and governing any jury studies the parties may undertake.

Respectfully submitted,

JACK SMITH

Special Counsel

By: /s/Molly Gaston

Molly Gaston

Thomas P. Windom

Senior Assistant Special Counsels

950 Pennsylvania Avenue NW

Room B-206

Washington, D.C. 20530

- 19 -

# EXHIBIT 9B

#### X Post from @realDonaldTrump (Nov. 11, 2020)



https://x.com/realDonaldTrump/status/1326525851752656898

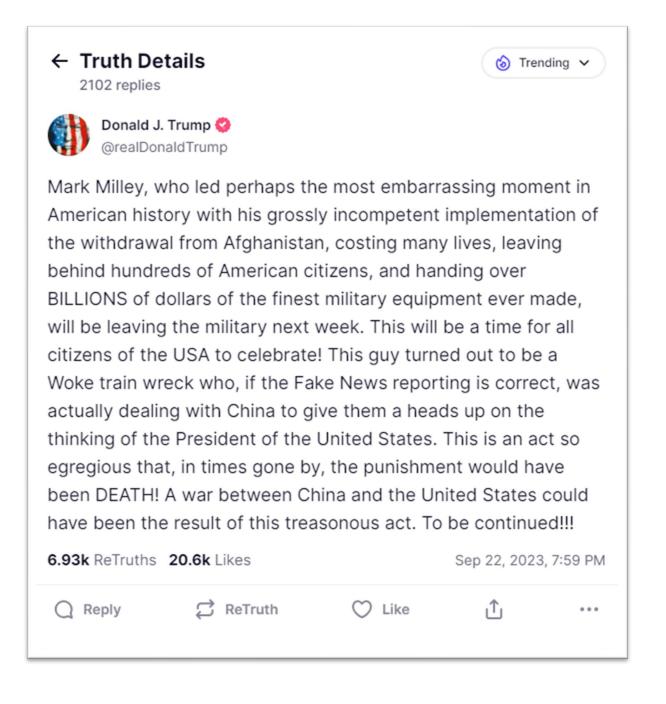
\_\_\_\_\_

Excerpt of City Election Commissioner's Testimony Before the House Select Committee to Investigate the January 6<sup>th</sup> Attack on the United States Capitol (June 13, 2022)

After the President tweeted at me by name, calling me out the way that he did, the threats became much more specific, much more graphic, and included not just me by name but included members of my family by name, their ages, our address, pictures of our home. Just every bit of detail that you could imagine. That was what changed with that tweet.

https://january6th-benniethompson.house.gov/legislation/hearings/06132022-select-committee-hearing (at 1:47:14-1:47:43).

# EXHIBIT 9C



# EXHIBIT 10A

All of the competitors to TRUTH SOCIAL, especially those in the

1792 replies



Radical Left Democrats Party who are failing at every level, like to use their vaunted "disinformation machine" to try and convince people, and it is not easy to do, that TRUTH is not such a big deal and doesn't "get the word out" as well as various others, which they know to be false. I THINK TRUTH IS AMAZING! First of all, it is very solid, having over \$200,000,000 in CASH and ZERO DEBT. More importantly, it is the primary way I get the word out and, for better or worse, people want to hear what I have to say, perhaps, according to experts, more than anyone else in the World. My TV ratings are by far the highest, and my Rallies are not equaled, even close, anywhere or by anyone. Look, I had hundreds of millions of followers on various platforms, and could have them back again, but was cancelled for largely political reasons. Those platforms all want me back...They need me back! On Truth I have 7,000,000 followers.....

5.83k ReTruths 20.5k Likes

Apr 04, 2024, 6:57 AM

232cr-80101-AMC - Document 652-10 Entered on FLSD Docket 06/26/2024, Page 1389 replies



Page 2: Very good for a startup, and growing fast. But when I put out a statement or message, it is SPREAD all over the place, fast

and furious, EVERYBODY SEEMS TO GET WHATEVER I HAVE TO SAY, AND QUICKLY. At press conferences I will sometimes ask, "who is on TRUTH." I have never had one reporter tell me they

are not. They are all on TRUTH because the have to be. So don't believe the FAKE NEWS. Until I came along and exposed them,

they were respected and believed. Now they are the exact opposite. With the Russia, Russia, Russia HOAX, and all of the others, people get it. Look, using TRUTH, I became the Republican Nominee for President of the United States, and in

ALWAYS WIN. If it didn't work, or properly get the word out, I

wouldn't use it - But it does work, and work really well - And the fun is just getting started!!! 5.35k ReTruths 19.2k Likes Apr 04, 2024, 7:21 AM

record time! When I ENDORSE a politician on TRUTH, they almost









Like

## EXHIBIT 10B

## **READ: Transcript of CNN's town hall with former President Donald Trump**

cnn.com/2023/05/11/politics/transcript-cnn-town-hall-trump/index.html

May 11, 2023



Read the full transcript of <u>CNN's presidential town hall</u> with former President Donald Trump moderated by CNN's Kaitlan Collins at Saint Anselm College in Goffstown, New Hampshire.

[\*\*\*]

COLLINS: But when it was clear to you that they were not being peaceful – you saw them rushing the Capitol, breaking windows. They were hitting officers with flagpoles, Tasing them, beating them up.

When it was clear they weren't being peaceful, why did you wait three hours to tell them to leave the Capitol? They listen to you like no one else.

TRUMP: Yes.

COLLINS: You know that.

TRUMP: They do. I agree with that.

## EXHIBIT 10C

### ← Truth Details

1771 replies



April is the biggest month of Traffic on TRUTH SOCIAL, by far. It has become one of the most important "Voices" in the Universe, because it is my Voice, but the Fake News, most of which is dying, or dead, refuses to report on it, or its relevance. WHEN I TRUTH, IT GOES ALL OVER THE PLACE. REMEMBER THAT, AND WATCH!

9.27k ReTruths 38.8k Likes		Apr 29, 2023, 2:07 PM		
Q Reply		◯ Like	<u>î</u>	