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4 SELECT COMMITTEE TO INVESTIGATE THE  
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6 U.S. HOUSE OF REPRESENTATIVES,  
7 WASHINGTON, D.C.

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11 DEPOSITION OF: JODY WILLIAMS

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Tuesday, June 7, 2022

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Washington, D.C.

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The deposition in the above matter was held via Webex, commencing at 2:06 p.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

6 THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8 [REDACTED] PROFESSIONAL STAFF MEMBER

9 [REDACTED] INVESTIGATOR

10 [REDACTED] INVESTIGATIVE COUNSEL

11 [REDACTED] CHIEF CLERK

12 [REDACTED] INVESTIGATIVE COUNSEL

13 [REDACTED] INVESTIGATIVE COUNSEL

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[REDACTED] With that, we can go on the record at 2:06 p.m. Good afternoon, everyone. This is a deposition of Jody Williams conducted by the House Select Committee to Investigate the January 6th Attack on the United States Capitol, pursuant to House Resolution 503.

Mr. Williams, can you please state your full name for the record and spell your last name.

The Witness. Jody Curtis Williams, W-i-l-l-i-a-m-s.

[REDACTED] Great. Thank you. And, at this time, Mr. Williams, could you please raise your right hand to be sworn in by the official reporter.

The Reporter. Do you solemnly declare and affirm under penalty of perjury that the testimony you are about to give will be the truth, the whole truth, and nothing but the truth?

The Witness. Yes, I do.

[REDACTED] And, Mr. Williams, can you confirm that you're able to sit for this deposition today?

The Witness. For right now, yes. I will let you know if that changes.

[REDACTED] Great. Thank you. Appreciate the honesty.

And, as I have mentioned, this will be a staff-led deposition, although members of the select committee can of course join and choose to ask questions. Right now there are no members in the room.

My name is [REDACTED] investigative counsel. Other select committee staff joining us today are [REDACTED] investigative counsel; [REDACTED] investigative counsel; [REDACTED] professional staff member; [REDACTED] investigator; and [REDACTED], chief clerk. I'll announce anyone else as they come in, whether it be staff

1 or members.

2 And I would like to note for the record that what has previously been marked as  
3 exhibit 1 is the subpoena for Mr. Jody Williams, which is dated May 17, 2022. The  
4 House deposition rules were included in this exhibit and were provided to you upon  
5 service of the subpoena.

6 It is my understanding you don't have counsel today, Mr. Williams?

7 The Witness. Correct.

8 [REDACTED] Thank you. So I also want to inform you, as we do with all of our  
9 witnesses, that providing false information to Congress is unlawful and that if you do  
10 provide false information to Congress that could result in criminal penalties, including for  
11 perjury and/or for false statements.

12 The Witness. Okay.

13 [REDACTED] Great. I wanted to cover the issue of objections quickly. Under  
14 House deposition rules, you may only refuse to answer a question to preserve a privilege  
15 recognized by the select committee, including the Fifth Amendment. If you do refuse to  
16 answer a question based on a privilege, staff may either proceed with the deposition or  
17 seek a ruling from the chair on the objection. If the chair overrules your objection, you  
18 will have to answer the question.

19 My goal today is to ask you questions that are relevant to the select committee's  
20 investigation with the hope that you will answer as fully as you can. If you do have an  
21 objection or a privilege to assert, we'll ask that you assert it for the record. I may seek  
22 to clarify the basis for the objection, and the more information you can provide on the  
23 objection on why you're making it, the easier it will be for us to evaluate those claims  
24 later on.

25 And, in addition, I want to note that, under House deposition rules, select



1 committee members and staff cannot discuss the substance of the testimony you provide  
2 today. You are free to discuss if you like. No other recordings, however, are  
3 permitted. Can you please confirm at this time you're not making any kind of recording,  
4 audio or visual, of this proceeding?

5 The Witness. I'm not recording. My house has surveillance cameras in parts of  
6 the house. I am in my children's playroom.

7 [REDACTED] Okay. Well, that's fine. As long as you're not making a direct  
8 recording of this, then that's all right with us.

9 We have an official court reporter who is taking a transcript of this deposition  
10 today. You will have the opportunity to review the transcript before the committee  
11 releases -- makes any release of the transcript.

12 So, before we begin, I just wanted to describe a few logistics, the first of which  
13 was just to reaffirm that there is an congressional reporter transcribing the deposition  
14 also via Webex, which means that it's really important for us to have verbal responses,  
15 both on my end when I'm asking you questions and your end when you're answering.

16 Sometimes we'll both slip up and I may ask you just to -- prompt you to make a  
17 yes or no answer if you shook your head or nodded your head, for example. And there  
18 may be times when we talk over each other, and we want to try to keep that to a  
19 minimum so that the reporter can get all of our answers and responses to the questions  
20 as quickly and as clearly as possible.

21 We ask that you provide complete answers based on your best recollection. If  
22 the question is not clear, please ask for clarification. If you don't know the answer,  
23 simply say so.

24 And, again, as I mentioned before we started, if you need any breaks for comfort  
25 or otherwise, please let us know.



1 A No, that's fine.

2 Q Great. Thank you. Do you have any other questions before we begin?

3 A No. This one thing is not quite balanced. It's driving me crazy. Sorry.

4 Q Oh, okay. Yeah, it does look better now. Great. So we can get started  
5 with just some background questions to ease into it. First off, what's your age,  
6 Mr. Williams?

7 A Forty-three.

8 Q And what about your educational history?

9 A Some college. I served in the Army. I received various training through  
10 that. And most of my education really is self-taught, IT background.

11 Q Great. Well, that anticipated my next question, which was have you ever  
12 served in the military or law enforcement?

13 A Correct. I was in the Army twice. I joined the first time on my 17th  
14 birthday in 1996. That was all done in Active Ready Reserve, as I was in an accident  
15 2 weeks later that precluded me from attending training. So I spent 8 years in Active.  
16 And then, about a year and a half -- no, 2 years after that was over, I signed up Active  
17 Duty a second time.

18 Q And how long was that second stint for?

19 A You're never going to believe it. I was in an accident about 6 months after I  
20 joined.

21 Q Oh, sorry.

22 A Another soldier ran a stop sign, and I lost my leg.

23 Q Oh, I'm so sorry.

24 A Oh, it happens. It's all right.

25 Q Well, thank you for your service. And no law enforcement though beyond

1 the military?

2 A No, I have never served in law enforcement.

3 Q All right. Okay. Have you ever been employed by the Federal  
4 Government aside from your time in the military?

5 A Not that I'm aware of. It's possible that I worked on a contract  
6 via -- through my time with Compact, or Digital I guess is who they were at the time, but  
7 not that I'm aware of directly.

8 Q Okay. And can you give me a general sense of your employment history  
9 over the last 10 years or so?

10 A I've been retired since I got hurt in the Army, which was in 2006.

11 Q Okay. Got it. And last question on this, where do you currently live?

12 A In San Antonio, Texas.

13 Q Okay. Great. All right. Thank you.

14 So I wanted to get into a little bit of the reason we're here today, and I thought  
15 we'd start kind of at the beginning. And it's my understanding that your involvement  
16 with The\_Donald subreddit preceded your time with TheDonald.win, correct?

17 A Correct.

18 Q And can you give me a brief overview and timeline of your involvement with  
19 The\_Donald subreddit first?

20 A I joined as a user. I mean, I was a user of Reddit, you know, probably, I  
21 don't know, 2, 3 years before that. I don't know exactly how long. And then I joined  
22 that specific subreddit, I believe it was in August of 2016. It was shortly after Ted Cruz  
23 dropped out of the race because that's who I had been supporting. Then I joined  
24 TheDonald as a user, and I was a user, and that's it until May, I believe, of 2017, and then  
25 I became a temporary moderator, and then, sometime in late June or early July, I became

1 an actual full-time moderator.

2 Q Okay. And what drove you to get more involved in the moderation  
3 process?

4 A I mean, I was -- I'm a disabled vet that sits at home a lot, so, I mean, that was  
5 part of it. I had a lot of time. Second of all, you know, I've always been pretty involved  
6 politically speaking with various different things. And, I guess, lastly, it was to have a  
7 chance to help steer things a little bit. Obviously, you know, my powers there were  
8 limited, but, you know, being a Ted Cruz supporter at the time, I think I had a lot of views  
9 that were different from a lot of the Donald Trump -- TheDonald Donald Trump fans, to  
10 say that directly, so the idea was that maybe I could use that to help influence.

11 Q Okay. And so you became a moderator in around 2017, you said?

12 A Correct. May -- May is when I started as a temporary moderator, and then  
13 that only lasted about 30 days. Then they invited me to be a permanent moderator, but  
14 I was on vacation. And, when I got back in the end of June, then I did join as a full  
15 moderator.

16 Q Okay. And so, as a moderator, you were largely responsible for reviewing  
17 posts that were made by other users on the site?

18 A Reported posts. It was not like we -- I mean, there were tens of thousands,  
19 so, you know, we didn't filter through every single one. We were reported -- we  
20 reviewed things that were reported.

21 Q Okay. And then we'll actually get into more of this later, but did you have  
22 regular communication with Reddit administrative staff as a moderator?

23 A I did not, no.

24 Q Okay. Were there other individuals who did?

25 A Yes.

1 Q About how many individuals were involved in talking with Reddit?

2 A I mean, we usually had one person who would typically make the bulk of the  
3 responses, but I think any of the higher level moderators could've done so and did at  
4 various times respond to them. So, you know, maybe two or three or four at most.

5 That's not to say we never messaged the Reddit admins ourselves. It just means  
6 we didn't communicate. I mean, like we would report things, so if we saw something  
7 that was very egregious, and we thought needed to be reported to them, we would file a  
8 report. But it's an automated system; it's not like you're chatting with somebody.

9 Q Right. About how many moderators do you think there were at the time?

10 A It varied, anywhere from 30 at the low to anywhere maybe as high as 50 or  
11 so, perhaps as close as 60 during times when we had a temporary team where we were  
12 trying out people.

13 Q Okay. So, with all that said, and we're going to get into a lot more of the  
14 substance of this soon, but I just wanted to get the rough dates for your involvement with  
15 TheDonald.win. It's my understanding that was started in late 2019, that website?

16 A So, I mean, the idea for it was kind of borne out in May of 2019 or so, April,  
17 May, something like that. I think I registered the site -- the site name, which is all I ever  
18 owned, in May or June of 2019. I'd have to look at the records to be exact. And then,  
19 you know, for 5 months or so we were working on it in the background, and then I think it  
20 was September, maybe even October, where we first allowed people to sign up and  
21 become members.

22 Q Okay. That's very helpful. So essentially around the time that Reddit  
23 initiated the quarantine of TheDonald is when you purchased the domain?

24 A Shortly after that, yes.

25 Q Shortly after that, okay. Great. So that'd be around June 2019?

1 A Yes.

2 Q And so you mentioned that all you ever did was own the domain for  
3 TheDonald.win. Can you describe your role in that website beyond that?

4 A I mean, I was the domain owner. I communicated with our registrar, which  
5 was Epik. It was somebody else I think before that, and I transferred it to Epik. It was  
6 maybe GoDaddy or Namecheap or something like that, and we transferred it to Epik for  
7 security purposes, or I transferred it. I shouldn't say "we." We decided to transfer it.  
8 I'm -- I did the actual transfer to Epik.

9 So I was -- since I owned the name, I was the point of contact between them,  
10 which, you know, for the longest time meant nothing because we didn't hear anything  
11 from them. But as election season ramped up we did start to get some complaints and  
12 notices from them.

13 I was also a moderator there as well, but, I mean, my moderation work had scaled  
14 down. I was doing more, I guess you could say, mentorship type of role. I'd been  
15 there for quite a while. I was also in charge of the Discord server for our users, so I was  
16 doing that more than working on the website.

17 Q And how -- what was the purpose of the Discord server for the users?

18 A Just to allow people to chat in real time.

19 Q Okay. So it was -- was it linked on TheDonald.win?

20 A I think so, but, you know, it's been, you know, they banned that server.

21 And we -- you know, it's been so long since that happened. I haven't seen the link so I  
22 can't exactly remember. I'd have to pull up an archive. But, I mean, people were very  
23 well aware of it. It was an almost 30,000-user server at one point.

24 Q That's helpful. So your main role was as site owner of TheDonald.win  
25 communicating with Epik and you said GoDaddy earlier on?

1           A    I think it was GoDaddy or Namecheap. I don't remember exactly who we  
2 registered -- I registered it through at first.

3           Q    And you said that shift was made because of security concerns?

4           A    Correct.

5           Q    Was that related to the concerns around the election?

6           A    Just general security concerns, just worried about people being able to hack  
7 into it, worried about the politics of GoDaddy, maybe that they just -- they wouldn't like  
8 what we had up and decided to ban the site. We wanted to take this to somebody who  
9 was more inclined to support free speech.

10          Q    Okay. Got it. And when was that switch made?

11          A    I really wouldn't remember, no.

12          Q    All good. So I wanted to ask, about how many individuals were involved in  
13 helping you run TheDonald.win?

14          A    I wasn't running it. I worked there.

15          Q    Helping to administer.

16          A    Helping to moderate. There -- and not helping me, helping the  
17 administration team. I just want to be clear, because as you could see from the title of  
18 the Washington Post article, it says I was the owner. I was not the owner of the site. I  
19 was the owner of the domain name, very, very clear. I've never had access to --

20          Q    So can you give me a better sense of who was the -- what was the leadership  
21 structure of the site and your place in it?

22          A    Sure. It was basically just transferred over from Reddit. What was on  
23 Reddit was what ran things on TheDonald.win, although with one guy being in charge of  
24 basically doing all of the programming of the new website. He might have been -- you  
25 know, his -- technically he was only one rung down on the ladder if you looked at an org



1 chart, I guess, not that we had an org chart. But, since he had access to all the code, he  
2 might as well have been, you know, at the very top really. You know, he literally ran the  
3 server. He owned all the code. He was the only one with direct access to all of that.

4 So there was him, and then the guy who was actually at the top org-chart-wise  
5 was a guy who went by the name of Celtic Wraithman or Shadowman3001. And then  
6 there was a top moderator team, which included him, Shadowman, the guy who  
7 programmed the site. So, like I said, he was, you know, on an org chart, he would've  
8 been one rung down, and this would be that rung down, that top moderator group. And  
9 he went by Doggos, D-o-g-g-o-s. I don't know a real name. I don't know even anything  
10 about that guy.

11 Q That's the code --

12 A That's the guy who programmed the site, yes.

13 Q Okay. And so you don't have any other contact information for  
14 Shadowman3001? I think you have a phone number that was in the production.

15 A Yeah, I think I provided you a phone number.

16 Q Yes. So that would be on that?

17 A That's all I have. I don't have his name. I don't have any of that.

18 Although I believe it's been leaked by The Washington Post at some point, so it's  
19 somewhere. It's out there.

20 Q Okay. And so why was he at the top of the org chart?

21 A He was at the top at Reddit, and, you know, he -- they just copied it over.

22 Q Okay.

23 A They literally -- TheDonald.win was almost a like-for-like copy of Reddit, at  
24 least functionality speaking.

25 Q And was the decision made as a sort of team of moderators together to

1 move to the TheDonald.win?

2 A A sub team. I mean, there was maybe 10 to 12 of us. First, it started with  
3 about three of us, Celtic, Doggos, myself, and one or two other people just kind of in the  
4 background in our own little chat group saying, what are we going to do to prevent  
5 ourselves from going offline? And the idea was let's have our own site obviously so that  
6 won't happen.

7 And then we expanded the team to, I don't know, maybe five, six more people so  
8 we could kind of have everybody work -- a small group work on it obviously but have, you  
9 know, have a little bit of, I don't know what you -- what the word I'm looking for is, sorry,  
10 but just having -- having a larger number of the moderators on the active team part of the  
11 development and the push to move over.

12 Q Got it. That makes sense. So I'll ask you get back to some of that soon,  
13 but first I want to run through a couple other questions. And this is kind of about other  
14 users from other platforms or other platforms themselves utilizing TheDonald.win or  
15 interacting with TheDonald.win, and so if you had any awareness of some of these  
16 platforms and their relationship to the TheDonald.win, if we could just talk through them  
17 quickly. And I'll list them, and if nothing comes to mind, we can just move on.

18 So the first is Gab?

19 A I can save you some time. There were no -- I mean, there was no  
20 cooperation with any other platform, none. I'm not saying that that doesn't their mean  
21 users didn't come and go. They did from -- I mean, we had no control over that. As  
22 far -- when Gab was getting a little bit bigger, yes, some of our senior moderators or I  
23 say -- the top moderator team, maybe some of the senior moderators were pushing  
24 joining Gab as a thing, but, as far as I know, there was no cooperation. There was no  
25 actual cooperation. You know, there was no API calls between the two services or

1 anything like that. It was TheDonald.win was an island.

2 Sorry, you didn't come across there.

3 Q Yeah, I was muted. Thank you. That makes sense. I guess, I'd also be  
4 interested in hearing about whether or not there were links to other platforms on  
5 TheDonald.win or if you knew of TheDonald.win being advertised on other platforms.  
6 And it might be that you don't know that, but I guess one example that we can go to next  
7 is Discord. You said that you utilized Discord as a live chat for TheDonald.win users.

8 A Uh-huh.

9 Q So was -- could you expand on that at all, or was that basically the whole  
10 story?

11 A I mean, it was just a chat group that was open. Anybody could join it. It  
12 didn't mean you got full access immediately, but anybody could join, and they'd join.  
13 And then we would typically leave them sitting there in the open chat portion of the  
14 server where anybody could get to for probably weeks or months. It just depended on  
15 how active they were to see, you know, who they were, to kind of vet them. And then,  
16 you know, if they wanted to get vetted, they could request it, and we would talk to them  
17 a bit and then let them into the rest of the server.

18 Q Okay. That makes sense. What about Twitch? Is there any  
19 live-streaming?

20 A I have -- no, not that I'm aware of. That doesn't mean -- obviously people  
21 copied and pasted links from The\_Donald all over the web. I mean, at one point, I  
22 believe, they had said like 50 or 60 percent of all the political memes during that season  
23 were coming from us. So, you know, things got linked all over the place, but it's not like  
24 there was some concerted effort from the moderators to do that. It's just people grab it  
25 and do it on their own.

1 Q Sure. And we are really interested in what you're aware of and what your  
2 thoughts were, so that's a helpful answer.

3 How about Zello?

4 A I'm sorry? Spell that.

5 Q Zello, Z-e-l-l-o. It's a walkie-talkie app.

6 A I've literally never heard of them.

7 Q Fair enough. What about Parler?

8 A Oh, Parler. I mean, again, people linked to it, and, yeah, the -- I believe  
9 some of the moderation team might have pushed it at one point. But it's not that there  
10 was -- as far as I'm aware of, there was no communication with anybody over there to  
11 say: Hey, you push us, we'll push you.

12 Or there was no API calls; there was no database linking, nothing like that.

13 Q Okay. Similar story with Telegram?

14 A Correct. The only interaction we ever had with Telegram was, I believe, I  
15 had gone and checked out the supposed The\_Donald group at one point, and then I tried  
16 to tell them that they should shut down and stop calling themselves us because they  
17 were not us. So, you know, when people asked about it, our response was: Don't join  
18 them. That's not us.

19 Q Got it. So just a couple more. 4chan?

20 A No. I mean, you know how those guys operate, I assume. They're pretty  
21 anonymous as is, so --

22 Q Right. So same answer with 8kun?

23 A No idea.

24 Q Okay.

25 A Oh, you know what, that's not entirely true, because I think those guys went

1 to -- I think those are the guys who went to the guy who had made the site and asked for  
2 their own community. And I think he kind of helped put up another website for them  
3 that was not part of The\_Donald, but it was part of like this bigger thing that he was  
4 creating, Communities.win, which I have nothing to do with.

5 Q When you say the guy who made the site, you mean the site --

6 A Doggos, the guy who made TheDonald.win.

7 Q Okay. So --

8 A I believe the 8kun guys went to him and said: Hey, we like what you've got.  
9 We're getting pushed off of Reddit -- because they had a community on Reddit.

10 And he helped form something off of Communities.win, which, again, I really  
11 didn't have anything to do with. And that's -- I think he -- I think he created a  
12 community for them, but I wouldn't remember the name of it or anything like that.

13 Q Okay. That's helpful. And this is jumping way ahead, but Doggos is the  
14 person who is responsible for organizing the other win community sites?

15 A That's correct. As far as I'm aware of, he is -- or he was when I left, which  
16 was, I believe, January 13th or so, 2021. It's been a long time.

17 Q And so you were only ever involved in the one TheDonald.win site?

18 A I helped -- so, yes and no. I helped to write some of the stuff that would  
19 end up being kind of the framework for Communities.win at one point, some of the ideas  
20 behind it of how we were going to run it. And I had registered some domain names that  
21 we used for some of the folks that -- I think for the conservative subreddit, for instance.  
22 I believe Conservative.win I had owned at one point, and I gave it to them when they  
23 joined. But that's as far as my, you know, work on that went. It didn't go very far.

24 Q So was the plan for the .win communities to sort of be a phantom, I think  
25 you said living copy of sub -- of various subreddits, was that the hope?

1 A Basically a more free speech Reddit basically, yeah.

2 Q Okay. That's very interesting. And one more question on this, and then I  
3 want to dive in a little more. Why did you take on the owner role in terms of buying the  
4 domain name? Was there a reason for that?

5 A We -- so several different people registered quite a few different domain  
6 names while we were brainstorming. And then when we, you know, went to push the  
7 website live, we had to pick one, and the one that I owned was just one of the those  
8 picked. It was the one that we picked.

9 Q Okay. Got it. So a number of you had purchased?

10 A We must have purchased probably close to 100 or 200 different domain  
11 names between several different people, so, yeah.

12 Q Okay. And that was all around the time that the quarantine was imposed  
13 in mid 20 --

14 A It was between that and over the next year really. I mean, we kept  
15 purchasing other ones, you know, thinking about it, saying: Hey, this one sounds like it  
16 would be good, grab it.

17 Q Because you were working on it behind the scenes from like June 2019 until  
18 you said --

19 A September, October when we went live in 2019, so, yeah.

20 Q Okay.

21 A But, even after that, we were still purchasing domain names and just  
22 brainstorming.

23 Q Interesting. I want to go into a little bit more detail about The\_Donald  
24 subreddit, but before I do, I wanted to see if any of my colleagues had any questions.

25 It doesn't seem like that's the case, so maybe they'll chime in soon.

1           So, going back to your time as moderator of The\_Donald, can you walk us through  
2 what it was like to be a moderator at the time, what kind of content you were dealing  
3 with, the processes for actually being a user moderator on Reddit?

4           A    On Reddit, so, I mean, on Reddit, you had just about everybody that was a  
5 member of Reddit could report stuff, so -- and that's -- that's basically what happened.  
6 You know, there were bots that had been set up to mass report everything that got  
7 posted, so we'd in turn have to set up bots over time.    "We" being the moderation  
8 team.    I never set up any of the auto moderators as they call it.

9           But we would set up things that would catch those things as they happened and,  
10 you know, automatically clear them from the moderation queue because, you know, it  
11 would change on like a weekly basis.    So, I mean, the vast majority of what we dealt with  
12 on Reddit were bad actors trolling, really trying to make our job harder than it should be.

13           I mean, that's not to say there wasn't real content out there that needed to be  
14 moderated, but, you know, there might be 500 to 1,000 real reports in a day, and a bot  
15 could do 500 to 1,000 reports in a minute.    So some days we literally just sat there when  
16 the automated moderator wasn't up -- wasn't working for one reason or another, and we  
17 spent the entire day just clearing jerks who would literally just report every single thing.

18           Q    And so that was about the time when you had, you said, between 30 and 60  
19 moderators on the team that were --

20           A    Right.

21           Q    -- okay -- going through those both automated reports and then manual  
22 human reported content?

23           A    Yeah, which, you know, obviously makes it harder to catch the real stuff  
24 when --

25           Q    Right, of course.

1           A    -- you're dealing with tens of thousands of fraud -- you know, fraudulent  
2 reports.

3           Q    So trying to think through what the fraudulent reports were and what the  
4 real ones were, what were the kinds of concerning contact you were seeing and flagging  
5 and removing that was actually problematic as opposed to fraud?

6           A    I mean, for the most part, moderators weren't really flagging and  
7 removing and reporting things ourselves. We would -- I mean, unless it was something  
8 egregious, like somebody posted "I'm going to go shoot up a school" or something, which  
9 I'm not saying that it happened. I'm just saying that's what it would have taken for us to  
10 have seen something and flagged it ourselves.

11           Otherwise, we just took what people reported to us, and then we would review it  
12 and remove it. And that could be -- I mean, it could be anything. Yes, I mean,  
13 sometimes there was people making actual threats. And if they were directed threats,  
14 like towards an individual, especially like to an individual celebrity or a politician, whether  
15 the Federal, State, or local level, those would get reported -- they'd get removed, the user  
16 would get, you know, banned.

17           Sometimes it would just be temporary because, you know, we'd talk to these  
18 people and: I had a really bad day, and, you know, I was acting stupid, and I'm really  
19 sorry. And they had a good history. For the most part, you know, that's not what they  
20 were, but it did happen. But they'd get banned. We'd talk to the people. We'd  
21 research their history. We'd report them to Reddit if it was -- if it violated Reddit's  
22 terms of service. And, if it was, like I said, a directed threat, typically we would report  
23 them to the FBI as well through their automated site.

24           So let me be very clear: I reported dozens of things to them, and I've talked to  
25 them, you know, numerous times over the last couple years, and they said: Oh, we



1 don't have any of that -- which, I mean, I've reported things like child porn being posted  
2 up, and it blows my mind, but they can't seem to find it.

3 Q The FBI's automated site?

4 A Yes, through their automated site, correct.

5 Q So how was Reddit dealing with those posts once you flagged them, or you  
6 were removing them and that was kind of the end of the story? What was the role of  
7 Reddit management?

8 A I can't speak to what role Reddit would typically --

9 Q Okay.

10 A I could tell you, some of the users would disappear. I don't know how. I  
11 would assume that they either deleted the account because we banned them; they  
12 deleted the account because it was a troll account, which a very large number of them  
13 were, so they'd delete it and just create another one; or they were deleted by Reddit  
14 themselves. But I can't answer. I can't tell you.

15 Q Got it. And, in general, what did you think of Reddit's content moderation  
16 activities while you were there?

17 A It was -- I mean, it was one sided. It was pretty clearly one sided. We  
18 would get flooded with things. So they can see what gets reported to each of the  
19 subreddits, and they can tell, you know, what we're dealing with. And they could very  
20 clearly tell that we were dealing on a daily basis with people flooding it, trying to make it  
21 harder for us to do our jobs.

22 And we could point to, you know, hey, this is coming from this other subreddit,  
23 this -- let's say the Bernie Sanders. That's just hypothetical. I'm not saying it literally  
24 was them. But, hypothetically speaking, we could tell them: Hey, Bernie Sanders'  
25 group posted "look at The\_Donald, go attack these guys."

1           Nothing would happen to those guys.

2           We would get, you know, threats for not doing our jobs from the admins. They  
3 would drop a private message to the moderators, but all the moderators could typically  
4 see it. That doesn't mean we responded. Only the top moderators responded to it.  
5 But we would see these, you know, warnings from Reddit in the moderator messages  
6 telling us to do a better job.

7           You know, we'd respond, the top moderators would respond to them and say:  
8 Are you kidding? Can you not see what we're dealing with? We're trying our best  
9 here.

10          And we were. We were absolutely for the most part -- you know, I'm not saying  
11 there weren't some bad people on the team who weren't, but for the most part we were  
12 working very hard to try to stay on Reddit.

13          Q   That's interesting. So then what actually happened when the  
14 subreddit -- that caused the subreddit to be quarantined?

15          A   I believe the exact issue was over some trans rights post or something like  
16 that, some memes that people were making about it. And Reddit quickly changed their  
17 policies and decided that that was a protected group suddenly, and then they went back  
18 and retroactively kind of attacked us for that.

19          I'm not saying there wasn't a flood of these messages before that. There were.  
20 There were a ton of them. I mean, it became -- it was the meme de jure, I guess you  
21 could say. So it was all over the site or over the subreddit, and then they changed their  
22 rules, and they cited that -- some of those posts and some other stuff when they  
23 quarantined. I couldn't tell you exactly what they were.

24          Q   Was there also something about threats against lawmakers in Oregon?

25          A   Yes, supposedly. They said that some of our people were making threats

1 against police, but that's -- it wasn't lawmakers that I know of. It was police.

2 Q Okay --

3 A -- that's -- I do recall that specifically is what the administration message said  
4 to us was that we were making threats against police, which was, you know, funny at the  
5 same time, you know, we were telling people to support police. So, again, you know,  
6 they were trying to punish us for the actions of one or two or maybe even 10 or 20 users  
7 out of more than 1 million, so --

8 Q Right. Well, that is an interesting point, and if we could just detour for a  
9 second. You said obviously there was just a couple of users and that you saw and there  
10 were lots of users on the subreddit, and you also said a couple times you were trying  
11 pretty hard to stay on Reddit. So why was it important for the moderators to keep their  
12 base on Reddit?

13 A Reddit had much better reach than any site would was part of it. We were  
14 also worried that a lot of people wouldn't convert, you know, move over from being  
15 Reddit users to users of another site. So, yeah, the idea was to try to stay put so we  
16 could make as much of an effect on the election as possible.

17 Q And by that you mean the 2020 election?

18 A Well, politics in general is really -- I say "the election"; I mean politics.

19 Q Okay. Okay. That's really helpful. So you were worried that the ability  
20 of the subreddit community to influence public affairs, let's say, would be lessened off  
21 Reddit?

22 A Correct. I mean, on Reddit, you've got -- Reddit has got tens of millions,  
23 maybe even hundreds of millions of users that sometimes wander in and out of different  
24 subreddits that they've never been to before, so the potential there is obviously quite  
25 great whereas the potential on a website with a lesser known name was, as we were

1 concerned, was much smaller.

2 Q Got it. That's interesting context.

3 And rewinding from the quarantine for just a second, I have one other question.

4 While you were a moderator, did you ever speak with anyone associated with the Trump  
5 administration while you were in there?

6 A I never once did, no.

7 Q Okay. Not Dan Scavino, Brad Parscale, Jason Miller?

8 A I never once did.

9 Q Okay. Do you -- are you aware of other moderators who may have?

10 A I'm only aware of one moderator who said they did, but I have no direct  
11 knowledge that they actually did.

12 Q Okay. And just for our completeness of information, who was that  
13 moderator? Do you have any identifying information?

14 A That would've been the guy in charge, Shadowman3001, slash, Celtic  
15 Wraithman.

16 Q Shadowman. And Celtic Wraithman, was that his username for --

17 A That was his Discord username. His name on Reddit was Shadowman3001.

18 Q Okay. Were you aware of any other usernames?

19 A No. I mean, I think I have his user on Steam playing games, but not like on  
20 any other social media sites or anything like that.

21 Q Well, if you could send us his Steam username after this, that'd be great.

22 A I'm in not sure he's still on my friends list, but he was at one point. I'll look.

23 Q Okay. Well, if you could take a look, we'd appreciate that.

24 A I can look right now. I mean, that's easy enough.

25 Q And not sure if you already covered this, but who did you say that he told

1 you he'd spoken to from the Trump administration?

2 A He had said that he had the contact information for Brad Parscale at some  
3 point.

4 Q Did he say that they had spoken?

5 A He definitely alluded to it. I'm not so sure if he said like this is what was  
6 said or anything like that, but he made it sound like they had spoken.

7 Q Okay. But, other than that, you were not aware of any interaction  
8 between --

9 A No, I'm not aware of anybody else who had communication with anybody on  
10 the Trump campaign.

11 Q Okay.

12 A I don't seem to -- I don't think he's on my list anymore. This is my Steam --

13 Q That's fine. Thank you though. We appreciate your information.

14 A -- contacts.

15 Q And, [REDACTED] I don't know if you had anything else on this point? If not,  
16 no worries.

17 [REDACTED]

18 Q Yeah. Thank you, Mr. Williams. Just quickly as a followup, do you know if  
19 Mr. Scavino had an account on TheDonald.win?

20 A I don't know that. You know, even if somebody did have an account  
21 supposedly, we didn't keep anybody's information, so, you know, there was no way to  
22 verify it for the most part. That doesn't mean that a few celebrities didn't come and  
23 post their picture with their -- with a sign holding it up. I couldn't tell you if Dan Scavino  
24 was one of them or anybody else. The only person I could say for sure that did that ever  
25 was Steven Crowder.

1 Q Okay. So you're -- just for the record then, you're not aware of any Trump  
2 campaign officials or Trump White House officials who had an account on  
3 TheDonald.win?

4 A I'm not aware, but it wouldn't surprise me that one or two did, but I'm not  
5 aware, no.

6 Q And why do you say it wouldn't surprise you?

7 A It just wouldn't. I mean, it was -- it was a very, very, very active website.  
8 At one point I think we were in the top 500 websites in all of America traffic wise, so it  
9 wouldn't surprise me.

10 Q Got it. Thank you. And just to make sure I -- because I might have missed  
11 it and I apologize, your awareness of that it wasn't because someone had ever reached  
12 out to you, you know, outside of the website and said, you know, like: We really love  
13 TheDonald.win.

14 This is just your impression?

15 A No politician has ever reached out to me about the website, correct.

16 Q Understood. Thank you very much.

17

18 Q Thanks, [REDACTED]

19 So, Mr. Williams, if we could back up for a minute to talk a little more about the  
20 quarantine. I wanted to ask related to what we were talking about with the importance  
21 to stay on Reddit, what was the impact of the quarantine initially in June 2019 on  
22 subreddit traffic? Did it decrease?

23 A I mean, I wouldn't have any numbers or anything like that for you. I could  
24 tell you that it definitely seemed like it decreased a little, but it wasn't drastic at first,  
25 because at first quarantine, at the time when it initially went into effect, just meant you

1 really didn't show up on the front page anymore for the most part. There might have  
2 been some other aspects to it, but that was the major thing.

3 But eventually Reddit instituted more stuff when that didn't affect our traffic very  
4 much, and then they -- I think they removed us from searches. And then, when that  
5 wasn't enough, they added a warning. So, every time you came to our subreddit, a  
6 warning popped up first. So, you know, they continuously made it worse and worse and  
7 worse until, yes, eventually it did affect the traffic, but at first it was very minor.

8 Q So it seems like, when you're describing that iterative process by Reddit, that  
9 it was your impression that they were trying to squeeze out the subreddit?

10 A There is no doubt. I mean, the guy who runs this site made many  
11 comments about, you know, how he was trying to limit our influence on the site, yes.

12 Q So did you believe that was sort of political bias?

13 A Without a doubt. So he broke -- the guy who ran Reddit at the time, Steve  
14 Hoffman, broke one of their rules that they just supposedly never do, which is he edited  
15 some of our users' comments himself personally and changed them to make it look like  
16 the user typed things that he had said.

17 I knew about this directly because my brother actually was one of the people he  
18 changed their comments. He changed a few of them though. He -- people were, you  
19 know, making comments about him, you know, over moderating the site, more or less,  
20 and I guess it touched a funny bone, and he decided to edit people's comments.

21 So, yes, to go to that length where you would do something that, in the internet  
22 community, that's sacrosanct, you know. You don't screw with people's comments.  
23 You don't represent yourself as being that person, especially if you have access to the  
24 database like he would have. I mean, to do that is purely political.

25 Q Got it. Understood. And so, on that note, were you ever told how to fix

1 the subreddit and get out of quarantine, fix the subreddit?

2 A We were -- I mean, we were giving -- given milestones to meet, you know,  
3 not immediately after the quarantine, but, at some point, we were given some milestones  
4 and told this is going to be the appeals process, and they told us we had 30 days.

5 And then they told us -- I don't know if they told us immediately at that point, but  
6 eventually they told us, if we failed that appeal, we wouldn't have to wait 30 days the  
7 next time; we'd have to wait 60 days. So, in other words, 30 then 90, and then that  
8 would double again, so now we're up to 210 days, and then that would double again, et  
9 cetera, et cetera, et cetera. That's -- that's what they made the appeals process  
10 timeline. But the milestones they gave us were, you know, basically: Keep -- keep this  
11 kind of content, X, Y, and Z, off of your forum.

12 Q And was that based -- mainly the violent content and the transphobic you  
13 mentioned earlier?

14 A It was the violent content, obviously. I think there were some other things.  
15 I couldn't tell you exactly what they were. I'm not saying I never saw the list. I did see  
16 it, but it's been years. I do know that we worked -- I mean, we brought in more  
17 moderators. We brought in a lot more people. We brought in people to work  
18 24 hours a day. We all stayed up. We started keeping metrics.

19 We worked very hard to meet their milestones, and, when that 30 days was up,  
20 we felt we had met their milestones. I'm not saying there weren't some blips during  
21 that time where some things went -- got through that shouldn't or that you would hope  
22 wouldn't get through. There were some things. But, you know, we had a detailed -- I  
23 believe it was like 30- or 40-page appeal just that I didn't write. I think I gave you the  
24 name of the guy last time, and I gave you his phone number when we spoke.

25 Q Yes.



1           A    He wrote the appeal, and it was very indepth, and it answered every single  
2   one of their questions point by point by point.   And all we got back was:   Yeah, that's  
3   all great, but now we want this.   So it's not that we didn't meet their milestones, we  
4   absolutely did, they just -- they moved the bar.   And then they said:   We'll talk to you in  
5   60 days, so --

6           Q    Got it.   And, again, this effort that you're describing was because you were  
7   worried about losing the reach of a website like Reddit?

8           A    Correct.   We very much were trying to follow their rules.   We wanted to  
9   stay put.

10          Q    And so, once they denied the first appeal, were there additional efforts to try  
11   to meet these metrics?

12          A    Oh, yeah.   No, we kept trying to meet it all the way until the very end when  
13   we left, to be honest.   Well, that's probably not exactly true.   So after the first appeal is  
14   I believe when we started working and discussing the TheDonald.win, you know.

15          Q    Could you place that in time?

16          A    May, June 2021 or twenty -- sorry, 2019, May/June 2019.

17          Q    Okay.   So pretty soon after the first quarantine --

18          A    The first quarantine was appealed, which, you know, we submitted it, and I  
19   think it took them a week to get back to us and tell us it was declined.

20          Q    Okay.

21          A    And, after that, I had made the comment to a few people and a few other  
22   people agreed, which was, you know, it doesn't matter what we do, they're going to just  
23   change the bar again.   They're going to move it again and again, because we -- I was  
24   firmly of the belief that their goal was to limit our reach during election season, which I --

25          Q    This was about -- this was a couple months before 2020, and that would be

1 the kickoff of the election season, so that was your belief?

2 A Well, I mean, 2019, the kickoff of the Presidential election season is about 2  
3 to 3 years before these days, but, yeah.

4 Q Right, the day after the last one ends, yeah, right.

5 A Well, no, you can't -- you're actually more accurate than you think, because  
6 in 2017 was the first time when I told people, I told the moderating team shortly after I  
7 had joined that they were going to ban us as the election approached. So we had  
8 been -- and I say that because that gives the idea that, you know, we were pretty well  
9 aware of what their motives were long, long before 2020.

10 Q And what did you think those motives were? We've referenced it a couple  
11 times, but --

12 A Well, I mean, they made it clear right after the 2016 election that they  
13 weren't -- you know, several CEOs went up, including Reddit CEO, and I think Sundar  
14 Pichai of Google -- or was it Eric Schmidt at the time -- they all got up and said: Oh, we  
15 can't let this happen again and this is awful, and, you know, we're going to do things to  
16 limit what they called radicalized speech online.

17 But, you know, what they meant is we were going to curtail conservatives' ability  
18 to speak freely politically. They said it in 2016 days after the election, and like I told  
19 everybody back then is, when your adversary tells you what they're going to do, you  
20 should absolutely believe them.

21 Q Got it. That's helpful context. So, at some point later in the year, you had  
22 started talking about TheDonald.win or a potential alternate site in around  
23 June 2020 -- sorry, 2019, but then you said, by September or so, these measures had  
24 started to really affect traffic on the site.

25 A It was probably sooner than that, probably more like June or -- I mean July or

1 August where things kind of had ramped up really badly. You know, that's when they  
2 put the warning label up and everything. So, if you opened it -- if you opened it on the  
3 web you could avoid it, but if you opened it like from your phone from an app, it always,  
4 every single time popped up the warning message, which, yeah, that absolutely curtailed  
5 our traffic.

6 Q Okay. So the warning interstitial message did --

7 A Correct.

8 Q -- make an impact, whereas the first ones didn't really make as big of an  
9 impact?

10 A Correct.

11 Q And then is that what helped push this core group of moderators over the  
12 edge of wanting to pull the trigger on the TheDonald.win?

13 A I mean, we started working on it right after the first appeal was denied.

14 Q Okay. So then once -- but is that when you started to make it public? I'm  
15 trying to get the timeline.

16 A No, we didn't make it -- I'm not saying nobody knew. I mean, there were a  
17 very limited number of like higher-end users who probably would've known. I wasn't  
18 going around spreading to this anybody, but there is -- it's a high likelihood that some of  
19 our higher-end users would've known.

20 Q Okay. And so then, as you approached the end of 2019, eventually there  
21 was a decision made by the moderators to freeze the subreddit, right?

22 A Correct. When we made TheDonald.win live, we froze the subreddit at the  
23 same time.

24 Q Okay. And was that basically to encourages folks to use TheDonald.win  
25 instead?

1           A    It was to encourage them.  It was also because we were no longer going to  
2 moderate the subreddit, so, you know --

3           Q    Got it.

4           A    -- we didn't want to be blamed for stuff that was going to be posted there if  
5 we weren't going to be there.

6           Q    Got it.  So you're basically abandoning ship, so to speak?

7           A    Yeah.  And, yeah, we were moving locations and is --

8           Q    Okay.  And when you did that, were you advertising the TheDonald.win on  
9 the subreddit, because moderators can still post, correct?

10          A    Yes, yeah.  So, yeah, we -- the moderators were still posting from time to  
11 time.  I think I made one maybe two posts myself encouraging people to move over.

12          Q    Okay.  And you never heard anything from Reddit about advertising  
13 TheDonald.win.  They seemed fine with all of that?

14          A    No, we were actually for it.  We thought they were going to ban us the  
15 moment we told them to move over, but they did not.

16          Q    So, as far as you know, you never received any communication, because the  
17 subreddit kept going for a few months after you -- after that, right?

18          A    Right.  I mean, them banning the subreddit was the main reason we kept it  
19 quiet what we were doing because we thought the moment they knew we were leaving,  
20 they would ban the subreddit, but they did not.

21          Q    Was that surprising to you?

22          A    I think it was extremely surprising to me and a really bad move for them  
23 politically speaking and even business speaking.  I mean, they lost a ton of their users  
24 because they allowed us to leave it up on the site for so long.  Once we froze it, you  
25 know, we had our little -- we were -- we thought we were going to be banned

1 immediately and we might, you know, get 10,000 or so users to move over. We didn't  
2 get banned immediately, and we had hundreds of thousands of people move.

3 Q So the delay in the quarantine or the elongation of quarantine --

4 A It went from a quarantine to a ban, yeah.

5 Q Right.

6 A I mean, that helped us a lot, of course.

7 Q So you say it was the difference perhaps of 10,000 users migrating over to  
8 hundreds of thousands --

9 A Versus 1 million or so, yes. Yes, absolutely, without a doubt. I mean, we  
10 would've probably gotten those users eventually, but we had -- there was basically no  
11 slack going from Reddit to .win.

12 Q So, as you set up or stood up TheDonald.win to the public in around  
13 January 2020, you basically had an automatic user base of 100,000 or so or more?

14 A I wouldn't know exact numbers, but it was a lot. I mean, it was a whole lot  
15 more than we expected.

16 Q Got it. And that was pretty immediate?

17 A Oh, yeah. Yeah.

18 Q And did you have access to the TheDonald.win's back end so that you can --

19 A [Nonverbal response.]

20 Q You didn't have that. So you didn't --

21 A The only access I ever had was to the moderation queue. I never had any  
22 access to anything beyond that.

23 Q Okay. So you weren't aware of where people were being referred to it  
24 from?

25 A Correct, I did not.

1 Q Okay. But it's safe to say that many people were learning about it, in your  
2 view, from the subreddit?

3 A From the subreddit, from various YouTubers who would comment, and from  
4 people linking to Facebook before Facebook started banning all of our stuff, et cetera.

5 Q And were there particular YouTubers that were advertising it a lot in your  
6 mind?

7 A No, not a lot, not that I would -- maybe some smaller guys I didn't watch,  
8 but --

9 Q Okay.

10 A No, I mean, I watched some of the bigger guys, you know, Steven Crowder,  
11 Stefan Molyneux before he was banned, stitch and hammer, a few of the other guys.  
12 And they weren't, you know -- they weren't beating The\_Donald drum every day. I'm  
13 not saying they didn't bring it up from time to time, but it wasn't, you know -- there was  
14 no partnership and there was -- as far as I'm aware, nobody asked them to beat that  
15 drum, so --

16 Q Sure. It was more of an organic thing.

17 A Yeah. Can I ask for a short break? I need to use the restroom.

18 Q Yep. Yep. Do you want to come back on the record in 10 minutes, 3:15 or  
19 so? Does that work?

20 A Yeah, that's fine. Ten minutes is perfect.

21 Q Great. Thanks, Mr. Williams. We'll go off the record at 3:04.

22 [Recess.]

1

2 [3:15 p.m.]

3 [REDACTED] So we can go back on the record at 3:15.

4 [REDACTED]

5 Q And thank you, Mr. Williams. I think where I wanted to pick up was asking  
6 about -- you were talking about some YouTubers who were promoting TheDonald.win as  
7 you were transitioning, but you also said there was some advertisement or promotion on  
8 Facebook and Twitter, too.

9 Can you speak to that a little bit more?

10 A Oh, no, all I was saying is that, you know, there weren't any actual  
11 campaigns or anything like that, but that doesn't -- that didn't stop users from posting,  
12 you know. People who posted various pictures and memes that were from the site  
13 quite often were labeled with, you know, the URL TheDonald.win. That helped to  
14 spread the site.

15 Q And this was before Facebook and Twitter removed some of these accounts  
16 in early 2020?

17 A I'm not sure about them removing accounts, but I know that, you know, they  
18 banned mentioning TheDonald.win at some point.

19 Q Okay, got it.

20 And one other question that occurred to me was that you had been sort of having  
21 the idea of the website, the alternate website from around June 2019 onward, but the  
22 decision to actually shut down the subreddit and move wasn't until about 6 months later,  
23 maybe 5 months later.

24 Why was it a backup plan for so long? Was it just the things we discussed about  
25 wanting to stay on Reddit, or was there something more going on?

1 A There was a lot of work to do to program a new site and get it up and going.

2 Q Okay, that makes sense.

3 And closing questions on this section: What did you have in terms of contact  
4 with Reddit during that freeze period from January '19 to June 2019?

5 A Again, I had none.

6 Q None, okay. Were you aware of, sort of, other contacts with other  
7 moderators?

8 A I mean, they -- I think they filled up two more, maybe three more appeals.  
9 I think two, two. Yeah, two.

10 Q Okay.

11 A And they were all declined. And, you know, it was the exact same story as  
12 the first, that we felt we had met all their milestones. They changed what they wanted  
13 done and said, We'll see you again at double the amount of time as the last one.

14 Q Okay. And you were basically, as you said, anticipating that the subreddit  
15 would be shut down basically as soon as you froze it and started talking about  
16 TheDonald.win?

17 A That's what the belief was, yes.

18 Q Right, okay. And then, the final decision to shut down the subreddit was in  
19 June 2020, when Reddit had their new -- new policy rollout. What did you make of that  
20 decision to shut down the subreddit at the end of the day?

21 A I mean, I had -- like I said, I had warned people in 2017 that they were going  
22 to ban us as the election approached. As -- you know, after they didn't ban us when we  
23 mentioned TheDonald.win, people were kind of confused, like I was. When is the ban  
24 going to come? And my response to them was shortly before the Republican National  
25 Convention, and that proved to be correct.



1 Q Got it. But, in general, it seems like you didn't have too much of a falloff in  
2 the size of your audience, because the shift had already been made when the --

3 A Like 8 months before then, yeah.

4 Q Okay. Great. Well, now I wanted to move into a little bit more of a  
5 discussion about TheDonald.win. We can just say TheDonald in 2020. And my first  
6 question, very preliminary, was there any ad revenue or sort of --

7 A No.

8 Q No, it was all volunteer?

9 A Correct.

10 Q Okay. And if we could at this point pull up exhibit 13, [REDACTED]  
11 So this is the -- it seems like the social media -- the guidelines for TheDonald.win?

12 A Yes.

13 Q And I was wondering about how these came about, who was making the call  
14 in forming these guidelines, and sort of, how they were meant to be a response to some  
15 of the guidelines on Reddit, if that was the case?

16 A So I wrote this.

17 Q Okay, interesting.

18 A It was me who wrote this. And this was not really TheDonald. As you can  
19 see, it's for Communities.win. This was basically the start and the end of my  
20 involvement of Communities.win, basically, of the overarching site, you know, which was  
21 really the Reddit replacement, I guess you could say.

22 I helped write the rules for the guy, and like I said, I transferred over a few  
23 domains. But, I mean, the idea was, yes, to -- to make it a lot like Reddit, but to also,  
24 you know, do our best to allow all content as long as it wasn't illegal.

25 Q And this would also apply to TheDonald.win even -- because it was part of

1 the Communities.win?

2 A But I mean, TheDonald.win had further rules on top of that that were, you  
3 know, a little bit more restrictive than this.

4 Q And what were those rules about?

5 A I wrote them. I thought I had sent them to you.

6 Q Oh, you may have.

7 A I wrote those as well, or the original ones, not the ones that are up there  
8 now. The ones that are up there now are not much changed, so I could -- let me pull  
9 them up so I can reference them. What was your question, again?

10 Q Oh, just the difference between these ground level rules and then what was  
11 added in TheDonald.win?

12 A So -- here it is. So those were like -- those were just really the ground rules  
13 for the community, which was the idea to have something to give people some guidelines  
14 if they wanted to form their own community.

15 And then the Donald's, on top of that, that went a little bit further where, you  
16 know, the site was only for Donald Trump supporters. The second rule, high energy  
17 is really just a -- more of a, I don't know, a pep-rally type of thing than a rule.

18 No racism. Whereas, you know, when we wrote the rules for Communities.win, I  
19 don't believe we specifically banned racism because, again, it's not that we agreed with it.  
20 It's just we were trying to allow people to have the ability to have free speech.

21 Q Got it.

22 A So, as I said, The Donald's rules were stricter than this by a decent bit, to be  
23 honest.

24 Q So what would you say were the goals of TheDonald.win's moderation  
25 policies?

1 A Mostly to keep the community focused, to keep it on target and to help  
2 present a good image, politically speaking.

3 Q Okay. So when you said "focused," focused on what?

4 A Elections, politics, you know. American elections, American politics.

5 Q And in particular, I guess the election that was coming up?

6 A Oh, yeah, yeah.

7 Q So, in terms of who was interpreting these content moderation policies, how  
8 many -- how many of you were involved in that effort?

9 A In coming up with the policies?

10 Q No, in sort of interpreting what --

11 A Oh, interpreting?

12 Q Yes.

13 A Oh, for the moderation. I mean, that was the moderation team, which I  
14 think for TheDonald.win might have been, you know, 30, maybe 35 people at most.

15 Q Okay. And that was people who had all been involved in the subreddits,  
16 they already kind of knew the ropes, or were there new people, too?

17 A I don't think there were any new people while I was there. They brought in  
18 some temporary people to become new moderators, I think right after I left, or right  
19 before I left, right around that time.

20 Q Okay. Thank you.

21 [REDACTED] can we bring up exhibit 14.

22 It might be helpful to talk through this. So this is kind of the document that  
23 might be with the Communities.win as well, but it was talking about Communities --

24 A And I also wrote this.

25 Q Okay, cool. So I was just hoping for some clarity on this. This talks about

1 Community moderators, and I was wondering about how those are different than, sort of,  
2 site moderators.

3 A So we had -- I mean, we had really not developed site moderators at the  
4 time, because there was really no Communities.win site.

5 Q Okay.

6 A So this is more talking to people who would be moderators like the guys who  
7 were running TheDonald, except for their own little communities. But as far as I know,  
8 I'm not sure this ever got rolled out at all. It's just something --

9 Q Okay.

10 A -- I typed up. And I used Reddit's as my guidelines and, you know,  
11 obviously made some changes, but yeah.

12 Q That's really interesting. So how were TheDonald's policies different than  
13 The\_Donald subreddit?

14 A I mean, The\_Donald subreddit's were -- our top rule was always to follow  
15 Reddit's rules first. So that was -- that was a big -- I mean, that was the main thing was  
16 to follow Reddit's -- Reddit's policies, whereas TheDonald, like I said, this didn't really ever  
17 go live, as far as I'm aware.

18 So our rules were never -- follow Communities.win's guidelines first. If that had  
19 gone live, that would have been the case, but, as far as I know, it never went live.

20 Q Okay. But in terms of, I guess, TheDonald.win's policies that were  
21 implemented for the period that we're talking about, basically early 2020 to early 2021,  
22 what were the main differences between that and Reddit?

23 A I mean, so, we allowed almost anything as long as it was free -- as long as it  
24 was legal, sorry, for the most part. Even things that we would find objectionable  
25 ourselves sometimes, that we were -- we led with the idea that as long as it wasn't, you

1 know, a call to violence or -- we did ban people who doxed folks and we removed that  
2 stuff. So people who leaked personal information, we got rid of that stuff.

3 So a lot of Reddit's policies we continued is the truth of the matter. But I would  
4 say that, you know, the main difference was, we weren't -- we weren't banning people  
5 who were, you know, having spirited discussions, or even were flat-out insulting towards  
6 people, based on ideology, sexuality, anything like that. As long as it was legal speech, it  
7 was allowed.

8 I mean, there were some things where we'd say, you know, this -- this makes the  
9 community look bad, and makes Donald Trump look bad. So that's why we had the  
10 no-racism rule, you know. Whereas it is protected speech, it obviously to -- in our minds  
11 was detrimental to what we were trying to accomplish. So, we still banned it, regardless  
12 of whether it was free speech or not, in that one -- that one instance.

13 Q Interesting. You said make Donald Trump look bad, too, was it sort of seen  
14 as part of the purpose of the Reddit -- sorry, the new site, to be a prominent forum for  
15 the President's supporters?

16 A Yeah. Oh, absolutely. Yeah. I mean, we billed it ourselves as the  
17 number one Trump fan site in America. I think we were.

18 Q And in large part, because the whole fan base had transferred over?

19 A Oh, yeah.

20 Q Yeah, okay. So give me one second.

21 In terms of some more nitty-gritty on content moderation, was everything posted  
22 on TheDonald.win public?

23 A There was no private section other than private messages between  
24 individual users.

25 Q Okay. So the moderator team, 30-odd people, they were able to access

1 everything. Could they access the private messages between people?

2 A I couldn't, at least. I'm not saying somebody else couldn't. I was never  
3 able to access anybody's private messages.

4 Q So you weren't aware of that. Got it.

5 And so, in terms of actual moderation activity, was this a user report system like  
6 Reddit, or was it more of a proactive searching and deleting operation?

7 A It was still a lot like Reddit. We had bots like we did have on Reddit. We  
8 had less of them, because we didn't have quite the same problems that we had on  
9 Reddit. We didn't -- you know, yes, we still had some troll accounts that would come in  
10 and report everything, but it wasn't as bad as it was on Reddit.

11 So we had less auto-moderating bots, but we did have a few, especially for looking  
12 for when people would post addresses. We had moderation bots that would look for  
13 that and tear it out and either -- I say ban the user, which is what it was, at least in our  
14 system, but the truth is, it would typically temporarily suspend them and notify us so we  
15 could review it.

16 Q And then decide whether or not to ban the user?

17 A Right.

18 Q Okay. Did you ever utilize those bots for looking for behavior related to  
19 violence or incitement of violence?

20 A Some, absolutely, yeah.

21 Q Could you walk through what that would look -- what that looked like?

22 A So I'm trying to remember exactly which instance it was. There was some  
23 politician in Minnesota or Michigan. I think it was Minnesota, because I think it had to  
24 do with the Chauvin trial, and Mr. Floyd, George Floyd, right? George Floyd, I believe.

25 I believe it had to do with that. There was a politician who had said something

1 about it that really upset some of our users, and people were flooding. You know, this is  
2 where this person's kid goes to school and things like that. So we did. We went in and  
3 manually updated the bots to look for that content and remove it immediately.

4 Q Okay.

5 A We did it on more instances than that. That's one I can very specifically  
6 remember.

7 Q Sure. No, no, that was what I was looking for. Thank you. That's really  
8 helpful.

9 And could you also clarify sort of the issue of users versus accounts versus posts.  
10 So, like, was it typical that you were just allowed to have one account? It wasn't  
11 anonymous like 4chan or 8kun?

12 A It was pretty anonymous. I mean, we didn't keep user information. We  
13 didn't require people to provide an email. Although if you didn't provide an email and  
14 you forgot your password, you were locked out.

15 So, you know, most -- I can't -- I was going to say most people provide an email.  
16 That's really -- I can't say that. I never saw the user database myself, so I don't know the  
17 answer to that. But seeing as it's pretty easy to create an email alias, I would assume  
18 that most people probably created email accounts, just like I did, to -- so they could  
19 unlock themselves if they became locked out, lost their password.

20 But no, we didn't keep anything. So there's nothing stopping somebody from  
21 creating 100 accounts.

22 Q Okay. And so, then, when you were removing posts, it was really just  
23 removing posts based on their violation of your community standards, and then if it was  
24 bad enough, you'd remove the user and then see if the whack-a-mole like popped up, if  
25 they popped up again?

1           A    That's what it was, it was whack-a-mole.    You're exactly right.

2           Q    Okay.    And I guess you saw the moderation processes at the subreddit and  
3 then at Donald.win.    Did you think that the kind of content you were seeing was  
4 different, in terms of the violence and the threats?

5           A    So at -- on Reddit, most of the stuff that we got was not our users, truth be  
6 told.    They were external people who'd come in, instigate things and then on a  
7 temporary user.    Because just like on TheDonald, it's easy to set up 100 accounts on  
8 Reddit.    It takes no time at all.    Yes, you have to provide an email address, but you just  
9 put a plus and a number or a symbol or whatever after it, and Google will let you create  
10 an infinite amount of aliases off of one email address.    So it was very simple for people  
11 to create lots of accounts, and people did.

12                    So on Reddit, the vast majority of even our actual -- not just bots but our actual  
13 trouble cases were external users who would go and do something -- say something really  
14 egregious and then they would immediately report.    They'd go back to their normal  
15 account and immediately report us to the Reddit admins, or even take a screenshot of  
16 what they said and take it over to another Reddit and say, hey, look at the horrible things  
17 going on over here.

18                    Whereas, then on TheDonald, we actually did.    We ran into some people who  
19 were more real users who would say things.    I'm not saying they were our normal users,  
20 but I think it was obvious that there were more of them that were people that came and  
21 communicated on, like, a daily basis.

22                    Whereas, on the subreddit, it would be some brand-new account, never  
23 commented before anywhere, not just on our site, on any of Reddit at all, would come  
24 and say something absolutely terrible.    You know, we need to go kill the President or  
25 something like -- I mean, it was -- some of it was terrible.    And then they'd go report it



1 themselves to Reddit, and it would become a mess.

2 But on TheDonald.win, it -- yeah, more often than not or more often than on  
3 Reddit, it was people who had longer term accounts and had been there, you know, were  
4 commenting on a daily or weekly basis.

5 Q So more authentic behavior that was in violation, it seemed to you?

6 A Definitely seemingly authentic. Now, after --

7 Q Okay.

8 A After the election in November 2020, we found a ton of user accounts that  
9 suddenly started posting. Now, these were -- and it started --- some of it posted the day  
10 before the election. But these were accounts that were created literally the first day the  
11 website went live, never once commented at all, and then, suddenly, thousands of them  
12 the day of the election, maybe even 2 or 3 days before, and then for, you know, the next  
13 2 months afterwards were posting a lot, a lot a lot. They were sleeper cells is the only  
14 way to think of them, because that's exactly what they were.

15 Q And you thought they were -- were they posting violent content?

16 A They were posting lots of stuff. So some of them -- some of them were  
17 posting violent -- some of them were also, you know -- I don't want to say Democrats, but  
18 Democrat voters that were anti-Trump people who were just waiting for the moment to  
19 come up and say ha, ha, you lost, you know.

20 So there was -- some of them were completely innocuous. I'm not trying to  
21 suggest that all of them were posting violent content, because that's not true. But there  
22 was a mix. There was a mix of them.

23 I mean, we had one user who came in, and this was shortly before January 6th,  
24 and was encouraging people to go up to D.C. and commit acts of violence. And we  
25 followed this user, and we found them on Reddit posting, Ha ha, I went and encouraged

1 these people to do all this stuff, and they actually believed me, you know.

2 That wasn't uncommon, though. I mean, there was just one that was very  
3 egregious. I mean, he literally like copied his post and everything, put it -- put a picture  
4 of it up there and said, this was me, not really a Donald supporter.

5 Q Got it. So that -- you think that activity really picked up after the election,  
6 and we'll get there.

7 A Oh, it got -- yes, very much so. But I'm not trying to say that was all of it.  
8 Let me be very clear. I'm not -- not going to -- there were people who were actual  
9 Donald Trump supporters who were very animated and were -- some of them were  
10 saying things they probably shouldn't have said and some of them maybe, you know,  
11 fantasized about doing things they shouldn't have been fantasizing to do. But as far as  
12 I'm aware, none of them actually carried any of it out.

13 Q Okay, got it. We'll get to some of that a little bit later, but I guess one  
14 question I had on this exchange, the authentic behavior for now, taking aside the spam  
15 bots, why did you think you were catching more authentic behavior? Was that because  
16 Reddit didn't have some of its own employees going through the community? Was it  
17 because of any events, or --

18 A No, no. It was because we didn't have -- a lot of the people who were very  
19 engaged trying to get us off of Reddit, you know, once we were gone, you know, they  
20 didn't follow us. Some of them did, as evidenced, you know -- or as I spoke to just a  
21 moment ago.

22 But, for the most part, most of them, you know, they got what they accomplished.  
23 We were off of Reddit and that's what they wanted.

24 Q But in terms of seeing some more problematic posts from genuine  
25 supporters --

1 A It's easier to catch the real stuff when you're not being flooded.

2 Q Okay. That makes sense. That makes sense. And I appreciate that.

3 So, in general --

4 A I'm sorry, let me interrupt you.

5 Q Yeah.

6 A Let me put it in perspective like this: The difference between a day's worth  
7 of reports on Reddit and a day's worth of reports on TheDonald.win was probably one,  
8 maybe even two magnitudes of order difference.

9 Q Wow. Okay.

10 A It was wildly different. We're not talking about double the amount of  
11 posts. We're talking 10 or even 100 times the number of reports.

12 Q Okay.

13 A So when I say it's easier to find the real stuff, oh, God, I mean, it's -- it's  
14 much, much easier. When you're looking for one out of 10 instead of one out of 100 or  
15 1,000, it's much easier to find the real stuff.

16 Q And this was still mainly user reports?

17 A Yes.

18 Q Okay.

19 A The vast -- the vast number of them were actual user reports.

20 Q Did you ever -- did the moderator team ever go through and look for  
21 keywords or anything like that?

22 A Sometimes, but I mean, for the most part, we let the community kind of  
23 police itself. I'm not saying that -- that doesn't mean we weren't watching the top  
24 posted posts in the comments that are underneath it.

25 So, yeah, if we stickied something, we typically were reading it, which would get

1 us engaged. And if we saw something bad enough to do something about it, we would.  
2 But it would have to be something in the top, I don't know, 10, 20 posts, at the most.

3 We wouldn't have -- I'm not saying there weren't moderators who didn't go  
4 through and were kind of anal about every single thing, but for the most part -- I'm sorry  
5 about that.

6 Q That's okay.

7 A For the most part, that was it.

8 Let me deal with this real quick. It's somebody knocking on my door. I'll be  
9 right back.

10 [REDACTED] Sure. We'll go off the record at 3:40.

11 [Discussion off the record.]

12 [REDACTED] We can go back on the record at 3:42.

13 [REDACTED]

14 Q Where were we? So, in general, when you first -- in the first months of  
15 TheDonald.win being the active base for these users, were you pleased with the shift with  
16 what you were seeing happening? Did you think it was a sort of freer place for people  
17 to talk?

18 A I think it was very successful.

19 Q Okay. Yeah, I know obviously that changed as the months went on and  
20 we'll get to that, but at first that's interesting context.

21 Why do you say that?

22 A We got a lot more users than we expected, for one, many, many times more  
23 users than we were expecting. And like I said, we lost most of the trolls that were  
24 coming from other subreddits just to cause trouble.

25 So it became -- there were some that still did come, but it was so much smaller. I

1 mean, it was maybe 1 percent of the number that we had on Reddit that it just became a  
2 much, much better community, much more focused. You know, it wasn't getting, you  
3 know, bombarded with random reports that had nothing to do with, you know -- it didn't  
4 have random posts.

5 You know, it didn't get -- one of the things that would happen to us sometimes on  
6 the Reddit was they would come in in the middle of the night and post, like, pornography  
7 and things like that, you know. That -- most of that came to a stop.

8 Q So it was more focused on the sort of political content that you were --

9 A Correct.

10 Q -- talking about. Got it.

11 All right. So I wanted to move now more into a little bit of conversation about  
12 the run-up to the election, and I want to ask if you saw any growth that was noticeable in  
13 TheDonald after that initial real launch in mid-2020.

14 Were there particular events that led to increases in users or --

15 A So the launch was in 2019, to correct.

16 Q Sorry. I meant when the -- after the Reddit shutdown.

17 A Oh. Oh, after June.

18 Q Yeah.

19 A I mean, we had already locked the site almost a year before that, or 8  
20 months or so before that.

21 Q Right.

22 A So most people that were going to come had already come.

23 Q Okay. So there wasn't a lot of growth from June 2020 onward?

24 A There was steady growth, yes, but not -- I'm not -- I wouldn't say they were  
25 the Reddit users. They were just people who found us online through other means.

1 Q Okay. Well, that was what I was curious about. Did you see growth in  
2 users for the second half of 2020?

3 A Oh, yeah. It was always steady, pretty steady.

4 Q Okay. And around Election Day, about how many users do you think there  
5 were on the site?

6 A I couldn't tell you.

7 Q Okay.

8 A I couldn't tell you.

9 Q You did already say that.

10 A I can tell you we were ranked I think 300 and something most active sites in  
11 America at the time, top 300, something like that.

12 Q And in those early months, earlier months, were there any major content  
13 moderation challenges that you could recall?

14 A Not really. I mean, like I said, we didn't add anybody for a long, long time,  
15 because it was -- it was much smoother.

16 Q Yeah. Got it, got it. And as the election actually got closer, did you  
17 perceive an increase in traffic? It seems like that --

18 A Oh, yeah.

19 Q -- would be likely.

20 A Oh, yeah.

21 Q And was there also an increase in sort of content that would be in violation,  
22 inciting violence or things like that?

23 A I mean -- around the election? I mean --

24 Q Yeah.

25 A -- nothing abnormal.

1 Q Okay, got it. And one thing in particular I was going to ask about was in  
2 late September 2020, I believe September 29th, President Trump made his comments to  
3 the Proud Boys to stand back and stand by.

4 Did you notice any change in the site after those comments that you can recall?

5 A Not really, no.

6 Q Okay. And kind of on a similar note, that comment was made in reference  
7 to the Proud Boys.

8 Did you have any knowledge of those groups having accounts on the website or  
9 members of those groups having any accounts on TheDonald.win?

10 A No, but nobody took it as him -- nobody from the Donald Trump fan base  
11 took it as him talking to the Proud Boys. We took it as him telling everybody to stand  
12 down and kind of calm down.

13 Q Oh, could you say more about that?

14 A That's just -- I mean, that's just how we interpreted the comments is that it  
15 was to everybody, Hey, kind of settle down.

16 Q Okay. Interesting.

17 So there was no -- in terms of TheDonald.win, you weren't aware of any accounts  
18 associated with Proud Boys or Oath Keepers in particular, because the only thing you  
19 were tracking was --

20 A I'm not saying they didn't post there. I wouldn't have known anybody  
21 directly. I don't -- I couldn't point out one of the accounts and say, That's it. There  
22 probably were one or two that said, I'm a member of the Proud Boys, or I'm a member of  
23 the Oath Keepers, but --

24 Q There was nothing concerted that you could remember?

25 A Nothing concerted, no.

1 Q Okay. That's really helpful context for us.

2 Did you see or remove any threats against election workers or other officials  
3 around the election?

4 A All directed threats were always removed by me, I mean.

5 Q By you?

6 A Anything that was directed was supposed to be removed by everybody.  
7 I'm not saying everybody did. But, I mean, you've got in your exhibits I think a lot of  
8 my mod -- or all of my moderation logs. You can see the type of stuff I removed.

9 And, you know, if there was a directed -- if there was a directed threat, kill this  
10 person, even if it was not kill this person, but let's go hurt Senators from this area, you  
11 know, that was direct enough to me that it needed to be removed, and I think most  
12 moderators were removing it as well.

13 Q Were there disagreements amongst the moderators about what kind of  
14 content to remove?

15 A I mean, yeah, always. There were always debates about this should come  
16 down, this shouldn't, about quite a few things.

17 Q In terms of specific sort of threats of violence against officials?

18 A No. Specific threats, no. Those always were supposed to come down,  
19 always.

20 Q But individual moderators had final say over the posts they were reviewing,  
21 kind of a first-come, first-serve basis?

22 A For the most part. But, I mean, a top moderator could always come and  
23 remove it. And if somebody missed it, somebody else usually caught it. I'm not saying  
24 things didn't slip through, but for the most part, somebody else would have seen it,  
25 because they would have approved it, let's say.



1           Let's say one rogue moderator said, No, I'm going to leave it this up. It would  
2 have been reported again immediately, especially a directed threat would have been  
3 reported within seconds unless it was on some little bitty thread that nobody was  
4 watching anyhow.

5           But if it was on the front page, let's say -- and I'm not talking about the post, I'm  
6 talking about the comments. If it was a comment underneath one of those posts on the  
7 front and probably even the second page, it would have been noticed within seconds  
8 from one of our more active users, and they would have, would have 100 percent -- oops,  
9 Java is trying to update on me. Sorry about that.

10           They would have 100 percent reported it. Every single time we would have  
11 gotten it back, and then a different moderator most likely would have gotten it, and it  
12 would have been removed.

13           Q    Okay. That makes sense.

14           A    I don't know of a single case of a moderator saying, let's leave this directed  
15 threat up. I mean, for one, it was very specifically against our rules; two, we think it's  
16 illegal, we very much thought it was illegal, I think it is illegal; and three, I think our  
17 domain host, our name provider, Epik, would have probably removed us as well.

18           There's a high likelihood that our host, which I had nothing to do with, sorry, I  
19 can't tell you who was hosting the site, but it's very likely they would have taken the site  
20 down as well. So, you know, directed threats we took very seriously.

21           Q    Got it. Got it. And before I move on, because that was really helpful  
22 context -- before I move on, I wanted to ask again about folks in the Trump campaign,  
23 Trump administration, and ██████ asked you this earlier.

24           But you never had any indication that there were individuals like Mr. Scavino who  
25 were monitoring or posting on the site, did you?

1           A    I did not. I'm not saying they weren't there. I mean, it rings a bell. I'm  
2 not going to say Scavino doesn't ring a bell. It does. And beyond the Trump campaign,  
3 it rings a bell.

4           But you're asking me about a time where I was busy handling the FBI requests. I  
5 was busy handling the one-to-one relationship between our domain, our domain name  
6 provider.

7           So my -- I mean, you can see also from the moderation logs that there was quite a  
8 lot of time where I was basically not on the site. I was busy with other things. So, I  
9 really couldn't --

10          Q    When you say it rings a bell, what do you mean by that?

11          A    I'm saying that I feel like I saw some posts about Scavino, but I'm not saying  
12 they were from him or anything like that. I feel like his name was posted on the site  
13 and, you know, I can almost see the post, but I can't remember much about it.

14          Q    Yeah. He did -- well, his posts were -- his posts from Twitter were shared  
15 on the site a bit. There's one with a dolphin and it's a meme with a dolphin and there's  
16 music in the background.

17          A    Yeah. I mean, we shared lots of people's memes and such, especially from  
18 Twitter. We did lots of taking things from Twitter and put it on TheDonald.

19          Q    Okay. Maybe that's where you remember it from.

20          A    That's very likely what I'm -- what I'm thinking about.

21          Q    Okay. And you don't know any other moderators who were having  
22 conversations with those folks?

23          A    The only person I know that ever said they spoke with somebody with the  
24 Trump campaign was Celtic. That's it.

25          Q    ShadowMan.

1           A    Yeah, ShadowMan/Celtic.

2           Q    Great.

3           A    And he only said it. I have no proof that he actually did. I wasn't a part of  
4 it, you know. Brad Parscale or none of them ever joined the chat and said something  
5 even like that. That was -- that never happened.

6           Q    Okay, got it. So I wanted to now kind of move after the election, and if you  
7 could just generally talk about how the site, the comments on the site changed in the  
8 days after President Trump lost in early November. Could you walk us through that?

9           A    I mean, people were upset, obviously. Nothing happened immediately  
10 because there was -- there was no decision I think, what, for almost a week, 2 weeks. It  
11 was sitting out there for some of those States. Arizona. Georgia was kind of sitting out  
12 there for a while. Pennsylvania, Michigan.

13           So, you know, it wasn't immediate, immediate. Like the day after the election  
14 was -- was still pretty upbeat. Let's make sure that this is all done on the up and up.  
15 But, I mean, as things started to roll over, yeah, people got more upset and said -- you  
16 know, that's when the "stop the steal" stuff started.

17           Q    Okay. And so, that was around maybe after President Biden was declared  
18 the victor on November 7? I think it was Saturday.

19           A    I think it was probably even before then a little bit. I mean, it was  
20 whenever -- whenever it became very apparent that some of these States  
21 weren't -- weren't handling the selection literally like every single election was handled  
22 before it.

23           Q    So that was kind of a -- you believe that there was some kind of misconduct  
24 or fraud happening in these contested States?

25           A    That's not for me to decide, but --

1 Q Sure. I'm asking more about what was percolating on the site.

2 A Well, obviously, people thought there was misconduct. For me, I would say  
3 it was an abnormality that, you know, clearly deserved some attention. But, yeah,  
4 obviously, I think the majority of our users saw it as misconduct.

5 Q Got it. Thank you. So we discussed in our last conversation the kind of  
6 content you were seeing on Reddit -- sorry, on TheDonald. And you said that most of  
7 the users knew how to couch things and skirt rules instead of posting things that were  
8 sort of openly violent and violating --

9 A I don't think I said most. I said there were some users who were doing  
10 that.

11 Q There were some, okay.

12 A There were people who came from another site, 9chan or something. That  
13 was a very racist site that specifically was trying to find ways to get around our rules.

14 Q Oh, got it. Was that 8kun or was it something else?

15 A It was probably them as well. I mean --

16 Q Okay.

17 A There were several different groups, you know, even -- it would have been  
18 some 4chan people as well, because 4chan people, some of them are like that as well,  
19 that came in and were specifically trying to probe the system to see how they could get  
20 around.

21 Q And this was after the election?

22 A And before.

23 Q Okay. And so in terms of skirting the rules, what kind of stuff were you  
24 thinking about when you said that in our last conversation?

25 A So the one I was specifically talking about I believe, I thought was 9chan, but

1 maybe -- maybe it wasn't.

2 Q I'm not aware of a 9chan, but there may be.

3 A Yeah, I know. I wasn't aware of them either until the guy posted. He  
4 posted some really insane stuff that was -- if you follow him, he got banned several times  
5 because they were things --

6 Q From your site?

7 A Correct, because they were things that broke the rules. And we -- you  
8 know, one of our moderators would talk to him and say, Hey, you can't say this, this is  
9 against the rules. And he'd say, Okay, come back, and he'd literally copy and paste the  
10 same sentence except maybe change one or two words. And he did this over and over  
11 and over again.

12 And then one of our moderators found him on, I think 9chan -- I'm pretty sure  
13 that's where he was -- and said, Hey, this guy is an actual Stormfront/Nazi guy who's  
14 literally over here on 9chan bragging about skirting our rules and trying to find ways to  
15 get in so he can try to convince our users of his ideology.

16 And he was. I mean, I saw the post. I think I copied and pasted it to the DOJ.  
17 I don't think I've got it anymore, but the DOJ has it. And it was -- it was -- he was  
18 bragging, Oh, my gosh, I got in these guys and I'm able to black pill these people on, you  
19 know, White genocide I think is what -- specifically what he was talking about.

20 Q Okay. That makes more sense. Thank you for clarifying those comments.  
21 So were you worried about the prospect of that happening more after the election or --

22 A I mean, I was always concerned with that. I think if you're running a social  
23 media site, whether it's large, small, whether it's focused on cars or politics or whatever,  
24 it's -- it's, you know, very important, you know, for probably almost primary importance  
25 to be watching for people who were trying to derail things.

1            Obviously, on Facebook, you know, with a much more general platform,  
2            that's -- that's -- that's a hard thing to do.    You're looking for actual troublemakers, and  
3            that's it there.    But for us, it was looking for anybody who was trying to take things away  
4            from American politics or who were intentionally trying to make us look bad, things like  
5            that.

6            Q    Got it.

7            A    Bad actors, plain and simple.

8            Q    Right.    All right.    So I think we're going to get into a couple more of the  
9            exhibits right now.

10           Right now, [REDACTED] can we bring up exhibit 17 -- sorry, exhibit 16.

11           So this November 18th email with Epik, your provider, or TheDonald.win's --

12           A    Correct.

13           Q    -- provider.    And so, this seems to be something, a postelection email  
14           where --

15           A    So this email is missing a ton of context.

16           Q    So there's -- okay, explain.

17           A    I was in the middle of the woods hunting and Robert had been trying to  
18           contact me for like 24 hours.

19           Q    Got it.    There are a number of emails like that.

20           A    Yeah.    He was getting more and more upset.    And this was the first time  
21           he had ever contacted me, period, as well.    So let's be clear.    I had never talked to him  
22           at all before this point.

23           Q    Okay.

24           A    And finally my phone just randomly rang one time, so I did get it.    And he  
25           and I, we ironed everything out, the people that were causing the issues, you know, we

1       dealt with them.    But yeah, yeah, Robert and I became pretty good friends.

2                But, obviously, you can't tell that by that email, because it was really -- it was -- I  
3       mean, in his defense, I mean, if you can't get in touch with anybody from the site and  
4       something bad is going down, yeah, it's disconcerting.

5                Q     So this was -- so when he's saying "waste time repeating myself," is that a  
6       reference to the multiple emails in this 24-hour period?

7                A     I'm sorry, say that again.

8                Q     Sure.    So in the second sentence, he says:    "We support too many good  
9       works for me to have to waste time repeating myself."

10              Is that repeating himself in the emails he sent you over the past day?    It's not  
11       like --

12              A     I don't remember if it was emails.    I think what ended up happening is I had  
13       too many -- two different emails registered with their site, and he was sending it to one,  
14       and then he finally sent it to this Hotmail account.

15              And I saw this, and that's when I turned my ringer on and saw him call and we got  
16       in touch with each other.    But, yeah, it was -- it was just a disconnect, that's all it was,  
17       but he and I straightened it out.

18              Q     Okay.    And this was related to the threatening of a private citizen, I think, in  
19       Michigan.    You said Minnesota, but it seems like it was in Michigan.

20              A     No, no, the Minnesota thing was something else.    It had something else.  
21       It wasn't this.

22              Q     So do you remember what this is about?    This seems like a private person  
23       in Michigan.

24              A     Yeah, this was private.    So the thing in Minnesota had to do with the  
25       George Floyd or Chauvin thing.    I believe one of the politicians there or the district

1 attorney said something, and that was -- that was completely different.

2 This, if I recall right, I believe was some Instagram/YouTube girl, a fairly liberal girl  
3 who -- it wasn't even TheDonald, but it got back to TheDonald. It was through I think  
4 Communities.win really and -- and one of the other sites there.

5 But she -- she was getting hammered by this other site. They were -- they were  
6 posting information about her and pictures that she had made online and such. And she  
7 was contacting Epik and saying, Hey, do you all -- are you all okay with me getting threats  
8 and things like that.

9 I would have to really dig into it to tell you the exact, you know, content, what  
10 happened here, but I believe that's what this was, was about that girl, which, you know, it  
11 was understandable. It was unfortunate that there was a disconnect, and as soon  
12 as -- as soon as we cleared that up, yeah, we dealt with it.

13 Q Okay. Well, if we go to exhibit 21 now, I think we can skip to that. So  
14 this, I believe, is going to be the content moderation changes you'd made after this  
15 incident once we're able to get it up.

16 A This would have been about one of the incidents around that time. I know  
17 that it's in the same email thread. You're not showing the whole thread there, so when  
18 they -- let me pull it up real quick and I can give you a better answer, because he and I  
19 talked about several things right around that time. And that was the -- that one was  
20 from the 18th.

21 Q Yes. So sorry, we're having a couple of problems with the exhibit. Oh,  
22 never mind, it's up.

23 So this is the --

24 A So --

25 Q Is this also in response to the post by the Instagram star?



1           A    I think it's the Instagram star.   So I'm going back to the original email that  
2   went to Epik was from -- sent to them, I think anonymously, from a [REDACTED],  
3   sent to their abuse@epik.com address.

4           And their complaint was there is a website, TheDonald.win, that Epik is domain  
5   registered that is -- this is all horribly spelled and bad grammar, but sorry -- that is doxing  
6   a man, his neighbors, his parents and his kids, open calls for someone to kill, shoot, attack  
7   this person, open call to call police and SWAT him, posting phone numbers and email  
8   addresses of work and home.

9           So they -- I mean, you get the gist of it.   They provided all that.   Then we've got  
10   some -- some pictures and such that were sent to us from Robert that -- that show us  
11   who they're talking about.   And this was in Michigan.   So I'm not sure --

12          Q    Yes.

13          A    -- if I sent you the attachments, but I see the attachments from Robert now.

14          Q    You did.   And I think that there were a lot of attachments that were  
15   personally identifiable for the man, because there was some doxing going on.

16          A    Correct.

17          Q    So I didn't want to include those in the exhibit.

18          A    Correct.

19          Q    But yeah.

20          A    So that's what this incident was.   I thought -- I thought this was another  
21   one, but that is what this incident was.   Ned Staebler, I guess, of Ann Arbor.

22                But, like I said, we -- you know, as soon as I got it from him, I got my cell phone out  
23   and my laptop, like I said, in the middle of the woods.   I immediately removed all of  
24   those comments and posts and -- and then, yes, some changes were made.

25                But, I mean, I wasn't able to make the changes myself.   I was able to present

1       them to the actual top moderators of the team, and then, you know, they made a few of  
2       the changes, based on our -- you know, mine and Robert's requests.

3               Q     Right.    So I believe that Mr. Staebler was involved in sort of the debate over  
4       whether or not to certify Wayne County's results.

5               A     Yes, it could have been what it was.

6               Q     Okay.    So it could have been related to the election.

7               A     Yeah, absolutely.   I'm sorry.   I thought it was the other one.   The other  
8       one had nothing to do with TheDonald.   And it must have been after that, because I do  
9       remember I had talked with Robert about it.   And this was the first time I ever talked to  
10      Robert.

11              Q     Got it.    So just to pull up an example just so you can refresh your memory  
12      on the content, could we bring up exhibit 18, [REDACTED]

13              So this is the kind of -- we don't have to read it out loud, but this is the kind of  
14      content that you removed in the woods?

15              A     I would have -- so everything that came in there that day that I was able to  
16      get to, I would have removed.   I'm not saying I was able to get to everything.   So like if  
17      you go look right now, that user is still an active user supposedly on Patriots.Win, but it  
18      doesn't look like they posted anything in a year.

19              But yeah, I mean, if I -- I'm not saying specifically this comment, because it's  
20      possible that -- I was on a horrible connection, so, you know, I got rid of what I could.

21              You know, I was on the phone with Robert for, gosh, I don't know, maybe 2 hours  
22      that night, literally talking to him, going through the content of the email he sent me,  
23      getting my laptop online and working out getting rid of this content, because these are  
24      directed threats and doxing, which were both against our rules.

25              Q     Got it.

1           We can take that down, [REDACTED] Actually, [REDACTED] can we go back to  
2 exhibit 21?

3           And so, thinking through how there was it seems some nexus between the vote  
4 certification in Michigan and these threats against the individual mentioned, was there  
5 any conversation about how to move forward with any other election-related threats?

6           A    I mean, obviously, I mean, we didn't really need to have too much of a  
7 conversation. The conversation always has been, directed threats have to go.

8           Q    Okay. And so can we walk through some of these additional measures that  
9 you imposed on November 18th, the temporary bans related to doxing and --

10          A    So, yeah --

11          Q    -- these moderators?

12          A    Like I said, I had been out in a deer blind all day. I got this call or I got -- I  
13 saw the email, then I turned on my phone and got the call very late in the evening. As  
14 you can see, my email that went out to Rob is at 9:15. And I think I was literally writing  
15 this while I was still on the phone with him, because I was on the phone with him and on  
16 chat with the moderation -- with -- in Discord with the rest of the moderation team.

17                There weren't, I don't believe, any top moderators online at the time. So, you  
18 know, we had to make a decision amongst the group that we did have. And these were  
19 the things that we just put in place basically overnight while we wait for the top mods to  
20 get online and see what all had gone down.

21          Q    Okay. So was there disagreement among the moderators on this kind  
22 of -- these kind of measures, or this was relatively unanimous?

23          A    Amongst the people that were online that night, this was pretty unanimous.  
24 I mean, like I said, I had no position of seniority, but since I owned the domain name, I  
25 guess I had sway. So these were my suggestions to everybody, and I believe everybody

1 that was there that night said, Yeah, absolutely.

2 Q But this wasn't -- there was no discussion about it in terms of the election or  
3 potential -- it was more related to the doxing concern?

4 A We didn't need it to be about the election. Threats and doxing, directed  
5 threats are illegal in our opinion, and always had to be gone.

6 Q That's helpful. So I guess was there any point in the couple of weeks after  
7 the election where you actually were concerned about the content that you were seeing  
8 related to trying to resist the verdict of the election.

9 A I mean, there were some posts that were made leading up to January 6th  
10 that I thought were inappropriate. I mean, as probably you read in The Washington  
11 Post article, I believe I commented that there was a post that was just how to tie a noose  
12 that I thought, you know, technically it doesn't really break our rules, because it's not a  
13 directed threat. So, I mean, it is -- it's free speech to tell somebody how to do that.

14 I just -- I thought it was inappropriate, especially in the context of what was going  
15 on, and people were getting pretty heated. So I had removed it, and then another  
16 moderator put it back up.

17 Q And so --

18 A And yes. So yes, people -- things started -- I wouldn't say user content was  
19 really worrying me as much as the moderator behavior had changed, and that was what  
20 worried me. User content, you know, we have no control over 1 million people plus.  
21 Some people are going to post stupid stuff.

22 Q Correct.

23 A But we can remove that, right? We can remove that. We can ban users,  
24 et cetera. So I don't really care about that so much, because as long as we're doing  
25 our -- or we were doing our jobs, it was okay, you know, because that stuff happens on

1 Facebook, it happens on Twitter, it happens everywhere.

2 Q Sure, sure.

3 A The moderator behavior is what concerned me.

4 Q So why was -- can you speak more about that? Why was the moderator  
5 behavior changing?

6 A I mean, because some of them were very obviously upset.

7 Q And so, therefore, they were approving some of these posts that --

8 A They were approving some things that we never would have approved just 2  
9 months before that.

10 Q And particularly related to some things around January 6th?

11 A Correct.

12 Q And I guess -- I do want to take a break, because I feel like it's a good point  
13 for us to pause before we go into some of those posts, but my last question I have was  
14 about the issue of directed threats, obviously, understanding there was a breakdown in  
15 how some of the moderators were looking at them.

16 What kind of specificity did you typically need to consider something a directed  
17 threat?

18 A I mean, any kind of threat towards an actual name would have been plenty.  
19 Doxing would have been plenty, or even a threat at a specific group would have been  
20 plenty.

21 You know, if somebody had said, Hey, go kill all the gay people, that would have  
22 been more than enough. That would have been removed. If they had said, we need to  
23 go beat up every Muslim we see, that would have been enough.

24 I know people probably don't believe that, but we would have removed that.  
25 Anything that was a call to violence would have gotten removed.

1 Q Okay. And that was the intention, at least.

2 A I mean, when I wrote the rules, calls to violence were literally in the rules.  
3 You cannot have calls to violence at all. I'm not saying they're still there, but I put them  
4 in there.

5 Q Okay. Well, that is very helpful context, and I think it sets us up well to go  
6 into some of these exhibits once we get back.

7 [REDACTED] Does anyone else have any questions before we break? We can take  
8 a 15-minute break. All right. Seeing none, Mr. Williams, anything on your end?

9 The Witness. No, thank you.

10 [REDACTED] All right. Cool. So we can go back on the record at 4:30, and we'll  
11 go off the record now at 4:14.

12 [Recess.]

1

2 [4:31 p.m.]

3

4 Q So we can go back on the record at 4:31.

5 And, Mr. Williams, we were just talking about some of the things that were going  
6 on on the site after the election and kind of getting a little bit closer to January 6th. And  
7 I think all of that you were talking about in terms of what was going within the moderator  
8 community was very helpful, and we might pull back on that, get back to that thread as  
9 we go through some of these next exhibits.

10 But, first, I wanted to ask, do you recall President Trump's tweet on December 19,  
11 2020, where he first mentions January 6th and he says, quote/unquote, "Be there, will be  
12 wild"?

13 A I mean, I don't remember the exact date, but, sure, I remember the tweet.

14 Q Okay. So could you recall an impact of that tweet on TheDonald.win?

15 A I mean, on TheDonald.win or everywhere? I mean, the truth is  
16 everywhere.

17 Q We could do both. So you could start with TheDonald.win.

18 A So I went through your exhibits, and I know where you're going with this or I  
19 have a very good idea where you're going with this. And there's a part of all of this that  
20 you wouldn't have seen because it was in the moderation team and things we spoke  
21 about in the background, which is some of these people, you know, like everything  
22 Donald Trump said was a code word to them.

23 And these are your -- these are your, oh, my gosh, what am I thinking -- the Q  
24 people, oh, my gosh. So the vast majority of the moderation team did not like, well, we  
25 called them Qtards, to be honest with you. It was our pejorative about them. We did

1 not like these people because everything was code to them, you know.

2 If you've ever seen the movie "Conspiracy," that's what a lot of these people  
3 remind me of, Mel Gibson, you know, seeing codes in everything. And, you know,  
4 Donald Trump could've said, "Come January 6th, be peaceful and let's talk about our  
5 differences," and some people would've still said, "Oh, see?" You know, they would've  
6 saw exactly what they said -- or what they wanted to see. And that's exactly what  
7 happened with some of that.

8 I will say that, you know, prior to all of that, we were pretty hard core at removing  
9 the Q conspiracy type of people, but it did relax a bit around that time, again, because a  
10 good number of the moderator team were upset as well. I mean, I was upset. I'm not  
11 saying I wasn't. But, you know, the difference between me and them is I was still trying  
12 to enforce the rules, and some of them were not.

13 Q So a couple things that there that I want to follow up on. Just to clarify,  
14 upset about Trump losing the election and things that might have gone on in some of  
15 those swing States?

16 A It wasn't losing the election as much as it was how. Losing an  
17 election -- elections get lost. It happens.

18 Q When you say how --

19 A Losing an election if everything is done abnormally, literally from the -- from,  
20 you know, how people -- how ballots were printed were different this year or in 2020 to  
21 how people were able to turn them in, I mean, all of that was different, and, yeah, that  
22 upset people.

23 Q Some of the relaxed -- or not relaxed, some of the code shifts in election  
24 code because of the pandemic?

25 A I mean, yeah, some of that. Some of the consent agreements that attorney



1       generals said signed with random groups that sued them, you know.   Changing election  
2       laws via consent decrees is new and hopefully will never happen again.   Pretty, pretty  
3       wild way to do it.   But, you know, some people found ways to manipulate the system  
4       and it worked, and that upset people, you know.

5               Q     So understand what you're saying that you were still trying to enforce the  
6       rules.

7               A     I was still trying to enforce the rules regardless.   I'm not saying I wasn't  
8       upset.   I was upset.   I'm not saying I wasn't.

9               Q     Right.

10              A     But rules, directed threats to me were still off limits, doxing was still off  
11       limits.   And to me, still if you were doing things that could embarrass not just Donald  
12       Trump but, you know, future -- the future politics of, you know, the MAGA movement, I  
13       mean, I was trying to shut that stuff down myself.   And I would say, the majority of  
14       moderators were, but there were people, especially people at the very top, that were  
15       not.

16              Q     And this would be Shadowman?

17              A     Shadowman, Doggos, and a couple of the -- Shadow -- look, there was a girl  
18       on the team who went by Ivag.   She was the other -- so out of the three top moderators,  
19       she was the third.   And she just did whatever Shadowman told her basically, so she  
20       might as well have not been there to be honest.   And then there were senior  
21       moderators under them, and then I was below that in the normal moderation team.  
22       The senior moderators really didn't mean that much anymore off of -- since they weren't  
23       on Reddit, but they were still there.   And there were people at the top, there were some  
24       people at the bottom as well, that were very relaxed on the rules.

25              Q     And so they were upset because of how the election was lost as well, and

1 they were more willing to have some of these directed threats or inciting materials on the  
2 platform?

3 A It wasn't that they were okay with -- nobody was ever -- nobody -- there was  
4 no policy that said directed threats were okay ever. Ever. But things like the noose or  
5 how to build a guillotine and things like that, those things, which never would've been  
6 allowed prior to the election because they were -- I mean, they were inciteful, I would  
7 say, they also made our movement look bad as well, they were allowed after the election.

8 Q Did you ever speak to the other moderators about that shift?

9 A I mean, absolutely. That's -- I mean, that was a good portion of why I quit  
10 was that, you know, they were -- they were doing things that I thought was going a little  
11 bit too far, and not only was it too far possibly legally speaking, but I'm not a lawyer, so I  
12 don't know, but I definitely thought it was too far politically speaking. It was making us  
13 look bad.

14 Q So, in terms of -- and I don't want you to speculate. I'm just asking if  
15 anything you were aware of, did you know the -- why some of these moderators were  
16 doing it? Was it kind of because they were upset, or did they have a particular goal in  
17 mind?

18 A The only thing I can tell you is they were upset.

19 Q They were upset, okay.

20 A I can't tell you of any specific goals. Nobody said, "Hey, let's hope that they  
21 storm the Capitol and they kill anybody," or anything like that. As far as I'm aware -- I'm  
22 not saying it -- I mean, I think I handed you some chat logs and some other stuff. I'm not  
23 saying it's not in there, but I don't think it is, and I don't recall it.

24 You know, obviously, if I hand -- chat logs are everything, right. So I wasn't there  
25 literally for every single thing, and I didn't read all of it. I didn't go back and read every

1 single thing that was said, so it's possible something is in there like that, but --

2 Q Yeah.

3 A -- I never heard anybody say that.

4 Q Okay. That's really helpful. And I did want to ask about that --

5 A And any specific -- when I say "heard," I didn't see anybody write it, there  
6 was no emails, nothing like that.

7 Q Okay. I know that's what we're curious about. And I did want to ask, I  
8 wasn't sure if I -- I'm going to have to go through, make sure I have everything in the  
9 production again. I don't know if those chat logs went through.

10 A We'll try again.

11 Q So, if you could try again. I wanted to flag that at the end, but we  
12 appreciate the whole production so far.

13 So, getting back to the -- sorry, Katy, did you have something to say?

14 The Reporter. I just wanted to remind you to speak one at a time. I'm getting a  
15 lot of cross talk.

16 The Witness. Oh, I apologize.

17 [REDACTED] Sure. I'm sorry, Katy. I hope we've been pretty good.

18 [REDACTED]

19 Q So, if we can get back to that December 19th tweet, and, again, trying to  
20 figure out exactly the circumstances that kind of led up to the attack and built some of  
21 this anger that we're talking about, would you say the focus on January 6th started with  
22 the President's tweet that you recall?

23 A Probably not. I mean, people were talking about going to D.C. to protest  
24 before that.

25 Q Okay.

1           A    In fact, if I recall -- I couldn't tell you what date, but I think people had come  
2 up with dates even before then for:  Hey, let's all go up there this time.

3           A    And it might have been January 6th, but, I mean, people had been talking about  
4 going to D.C. as soon as the election was over.

5           Q    And do you recall whether or not the conversation around those dates  
6 centered on the 6th after the President's tweet?

7           A    Oh, sure, yeah.  I mean, after it was announced that, you know, he was  
8 going to be there on the 6th to talk, yes, then anything else was kind of shut out, and it  
9 was just going to be on the 6th.

10          Q    Okay.  And that was pretty clearly reflected in the content on the site?

11          A    Yeah.  Yeah.  Sure.

12          Q    And so, [REDACTED] I'll get to you in one second.  I just have one other  
13 question.

14                I know you were talking about some of the Q people seeing everything as a code,  
15 but more generally --

16          A    Literally -- sorry, go ahead.

17          Q    Go ahead.  Go ahead.

18          A    I was saying literally everything.  I mean, they read something into every  
19 single tweet.  I mean, they -- if he looked a certain way they would say:  Oh, that  
20 means this.

21                I mean, some of these people were clearly sick.  That's all there is to it.  They  
22 needed some help.

23          Q    But, in general, do you think users on the site saw this as a call to come to  
24 D.C.?

25          A    Sure, I think a lot of people did, yes.  But, I mean, the number of people

1 that were Q people on the site was not -- I mean, I couldn't tell you exactly, but they  
2 weren't the majority of our users.

3 Q Okay.

4 A Like I say, we -- especially, prior to the election, we shut those people down,  
5 so a lot of them had left the site and never returned.

6 Q Okay. So, when you're talking about people seeing it as a call, it is not  
7 necessarily just the Q people, but it was a pretty clear call to action to come to D.C. once  
8 the President said so?

9 A Yes. Some people would've seen it, "Oh, hey, he just wants us to come and  
10 protest," which I think is what the majority of people saw it as, and some people would've  
11 seen it as whatever they wanted to, whether that is, you know, "Hey, let's bring  
12 weapons" or "Hey, you know, it's going to be 1776" or whatever. People -- some people  
13 absolutely, you know, they saw what they wanted to.

14 Q Right. Understood. Did you ever discuss that tweet with any of the  
15 moderators?

16 A I'm not saying I didn't, but I'm sure it was just in passing. I mean, I know  
17 that I spoke with three people total ever that asked me about whether I was going and  
18 whether they -- I think they should go. I told -- two of them were moderators. One of  
19 them is a friend of mine here in town. I told all three of them that I felt like it was a bad  
20 idea to go.

21 I said, you know: Things are hot already. You're going to a Democrat town  
22 with a new Democrat President. You're asking for trouble.

23 And that's what I told everybody that did ask. And like I said, there was only  
24 three people who directly asked me. I told them all three not to go. Two of them  
25 listened; one of them didn't.

1 Q It seems like you were concerned about the possibility of violence?

2 A I was concerned for the possibility of getting arrested even violence or not.

3 Q Okay.

4 A You know, all three of them are family people that asked. And I said:

5 You've got a wife, you've got kids, why would you risk that for anything?

6 Q No, I -- understood.

7 A My country is very important to me. My wife and kids are more.

8 Q I got it.

9 So, at this point, can we bring up exhibit 3, [REDACTED]

10 So this might be helpful just to walk through some of the issues with lines of  
11 content being blurred after the election. And so you could see that the second tweet in  
12 that thread, the second post of that thread rather, is: On January 6th, the man wants to  
13 show the world how many really love and support him.

14 And it seems to be after the President's tweet where he's announced the 6th.  
15 And you have a bunch of comments: True shock and awe campaign. Remember,  
16 remember, the 6th of January, where patriots gathered and fought. Democrats,  
17 treason.

18 And so I guess, would it be helpful -- it would be helpful for me to get a better  
19 understanding of if this was something that would've been slipping through the cracks of  
20 moderation after the election because some of the moderators were maybe not looking  
21 for this kind of content or approving it, or if this is something that would've not  
22 constituted a threat regardless?

23 A I don't see anything -- I mean, there's a comment down the "bringing three  
24 locked and loaded," but it looks like the comment above it was removed. Most likely  
25 that was somebody saying "bring your guns," which tells you how we would've reacted to

1 it. I mean, that's a perfect example.

2 If somebody made a threat -- or suggested you do something illegal, which, you  
3 know, there were some posts that were talking about how to get around gun laws in  
4 States in between where people were and D.C., and that's the type of stuff we would've  
5 removed. I mean, it's as simple as that.

6 The rest of this, while it's cute for theater purposes, which is what it is -- I mean,  
7 look, you'd be -- I'd be shocked if two of these people or even one of them actually went  
8 to D.C., you know. People who talk talk. That's what they do. And, you know, so  
9 most of this would've been left alone.

10 I'm kind of shocked that the "bringing three locked and loaded" was left up, but  
11 it's possible that wasn't there when the post above it, the comment above it was  
12 removed and then nobody saw it because it wasn't reported.

13 Q Well, that would've been hard -- would they have -- somebody been able to  
14 comment on something that had been deleted?

15 A Yeah, well, absolutely. They could've seen it, had it live on their page while  
16 we're in the process of deleting it.

17 Q Got it.

18 A I mean -- and this is a very -- there's 8,275 up votes on the entire thread.  
19 This would've been a very busy thread. There's a high likelihood that these comments  
20 were coming in almost every second. There's an extremely high likelihood that there  
21 were multiple moderators watching it, so, yes, there's a very good chance that he made  
22 that comment as that post was deleted. In fact, as you can see, it says: Deleted  
23 128 points. That means the user was deleted, so whatever they said was pretty bad or  
24 they deleted their user themselves.

25 Q Okay. Okay. Got it. That's helpful. But, to your mind, some of this

1 other stuff wouldn't cross that line into --

2 A Like I said, it would be LARPing, which is they would be role playing. That's  
3 how we would've read it. We would've read it: Yeah, this guy is full of crud. This guy  
4 is full of crud. This guy is full of crud. They're not saying anything. They're just, you  
5 know --

6 Q Okay.

7 A They're trying to sound cool for their friends. And, as long as they're not  
8 making a direct threat or they're -- and, you know, I don't see a single one of them saying  
9 "storm the Capitol" or anything like that, we would've, you know, -- yeah, we would've  
10 left it alone.

11 Q Right. And we'll get to some of the other posts that say more along  
12 those -- things more along these lines.

13 A Yeah. And I've seen those, yeah. I've seen those, yeah.

14 Q Yeah, but that is, I think, helpful context for how you were dealing with  
15 things after January 6th became the focal point.

16 I know people --

17 A I'm not saying --

18 Q Oh, go ahead. Sorry. Sorry. Go ahead. Go ahead.

19 A I'm not saying I don't read that and think these guys are idiots, because  
20 that's exactly what I see when I read that. All of these guys are idiots. Probably not a  
21 single one of them went. I highly doubt any one of them have ever given anything to  
22 their country. These guys that talk on the internet are just like anybody who talks on  
23 the internet on Twitter, on Facebook, on anywhere else. They talk. You know, I've  
24 gotten death threats a lot in my life from these kind of idiots. Not a single one has ever  
25 shown up at my house.



1           So I'm not saying these people don't make me think, "Gosh, how dumb and  
2 embarrassing," but, you know, we were letting people vent is kind of what some of this is  
3 is, you know, let them vent. But, you know, there's no direct threats in any of that, no  
4 plans, no calls to violence, so, yeah, we would've probably left a lot of this alone.

5           Q    Okay.

6           A    As we did, as you can tell.

7           Q    Right. Right. Right.

8           I know, [REDACTED] you might have had some questions on this exhibit before we  
9 moved on.

10          [REDACTED]

11          Q    Not specifically on this exhibit, but I wanted to follow up with you,  
12 Mr. Williams, on a couple of things. So you mentioned, when we were talking about the  
13 December 19th tweet and the change of traffic, that people might say a lot of different  
14 things that they're going to see code, and one of those things was 1776. So I'm just  
15 wondering, how often did you notice the phrase or the idea of 1776 in connection with  
16 responding to President Trump's December 19th tweet?

17          A    I couldn't really tell you like an exact number or anything like that. I could  
18 tell you that people had done that for lots of things though, you know. People would  
19 say that stuff after a Supreme Court ruling they didn't like. They would say it after, you  
20 know, some big, high-profile murder in another State; let's say, the Kate Steinle case, for  
21 instance. They'd say it for all sorts of things. I'm not saying though they didn't say it  
22 along with that. They did, obviously. But, again, you know, I look at people like that  
23 and just think they're role playing.

24          Q    Did you ever notice any sort of difference in how they were using 1776 with  
25 the tweet versus some of these other events?

1           A    No.  It's just more of the same, just maybe more of it but more of the same.

2           Q    But were they saying things like "we were called to revolution" or anything  
3 along those lines after the December 19th tweet?

4           A    I'm sure there were some people who said that.  I mean, you're talking  
5 about tens of thousands of comments every single day just on our site, and that's not  
6 even taking into account the millions that were on Twitter, Facebook, et cetera, et cetera,  
7 et cetera.  So, yeah, I mean, I'm sure there were people who said stuff like that.  Did I  
8 personally see something like that?  If I did, I don't -- it wasn't memorable.

9           Q    But the concept of it seems familiar to you in its own, even if you didn't see  
10 the specific posts?

11          A    Like I said, it was the same benign stuff they had been posting about other  
12 things for a very long time.  Like I said, as I tried to explain to you, I've been on the  
13 internet since the '80s, okay, guys, since some of y'all probably weren't even born.  I got  
14 on the internet when it was Genie and CompuServe and things like that.  People have  
15 always said really, really dumb things online.

16                I've had death threats for all sorts of things.  I've never once had anybody show  
17 up.  I'm not saying it doesn't happen.  Obviously, there's some cases where it has.  
18 But when I, with my experience and my background going as far back as it does, see most  
19 of this, I'm pretty good at spotting the people who are actually upset and planning  
20 something and the people who are not.

21                For instance, the El Paso shooter just a few years ago, the guy in the Wal-Mart, I  
22 found his manifesto online.  It was pretty clearly bad, you know.  The shooting was still  
23 going on.  My neighbor just happened to be the risk manager for the city of El Paso.  I  
24 walked over there, knocked on his door and said, "Hey, dude, here you go, you might  
25 want to turn this into your people," because he was obviously a deranged person who

1 was going to do something and was -- he was in the process of actually doing something.

2 But you can read and people who are committed to action typically don't post  
3 just, you know, just like this, these one-liners. That's not -- these are just role players.  
4 They -- they're embarrassing, and I'm not saying they didn't say some things they  
5 shouldn't have said, and probably some of them said things that were flat out illegal, you  
6 know, directed threats, but they're still role players, and they're just -- they're kids at  
7 home that need to get out more.

8 Q Definitely take your point.

9 [REDACTED] unless you have a followup on that, I was going to ask another question.

10 [REDACTED] Go ahead. I could follow up after.

11 [REDACTED]

12 Q Okay. In terms of another -- not this exhibit, Mr. Williams, but are you  
13 familiar -- and I'm sorry, I don't have the video in front of me, this "Fight for Trump"  
14 video? It sort of starts with like the world, and then there's a montage of clips about  
15 President Trump, and it's calling to fight for him on January 6th.

16 A Do you mind if I search for that real quick?

17 Q Yeah, go ahead.

18 A Give me just a second. I mean, there were several different videos kind of  
19 around that time. Are you talking about something specifically from the Trump  
20 campaign?

21 Q So this one, according to some reports, it might have originated on  
22 TheDonald.win a couple of days, I think, after the December 19th tweet or before, so I  
23 don't know if you're familiar with it.

24 A I'm going to mute my mike for a second and hit play because I think this is  
25 the video you're talking about, just let me --

1 Q Sure.

2 A Let me see it for just one second.

3 [REDACTED] We can go offered for a minute at 4:54.

4 [Recess.]

5 [REDACTED] Okay. So we can go back on the record at 4:55.

6 [REDACTED]

7 Q So are you familiar --

8 A I've seen this video, yes.

9 Q All right. Do you know if it did, in fact, originate on TheDonald.win?

10 A No idea. I mean, we had -- we did have some users who were very creative  
11 who put things like that together and throw it up. But, you know, if it originated -- if  
12 that's the first place it posted, it's not something that we specifically made, you know.  
13 We weren't -- I'm not saying there weren't people who made videos and memes that  
14 were part of the team, moderation team, but for the most part, you know, they did that  
15 on their own. I don't know where that originated.

16 Q Got it. And President Trump, I believe, did end up retweeting that video.  
17 But I think, based on our conversation earlier, he didn't have to come through you or get  
18 permission to do that, and there was no contact with President Trump's campaign to do  
19 so, correct?

20 A No, absolutely not. Not between me.

21 Q Not between you, as far as you know.

22 A As far as I know.

23 Q Thank you very much.

24 [REDACTED]

25 Q All right. Thank you, [REDACTED]

1           And thank you, Mr. Williams.

2           So now, [REDACTED] can we pull up exhibit 4, continuing this conversation.

3           So, in this exhibit, there is a comment about how "will be wild" is code for armed,  
4 as in armed. You can see it's cut off. Oh, we're fixing the exhibit header. It says "will  
5 be wild" is a hidden message, as in "be armed." And then there is further conversation  
6 about how he wants to be surrounded by patriots, "he" being the President, and  
7 speculation about whether or not he's going to enact the Insurrection Act that day.

8           I was curious if you had any recollection of discussion of the Insurrection Act or  
9 President Trump invoking the Insurrection Act in December 2020, January 2021?

10          A    I'm sorry. Say that last bit again.

11          Q    Sure. So was there a discussion on The\_Donald about President Trump  
12 invoking the Insurrection Act in December 2020 or January 2021?

13          A    I mean, I saw people bring it up on The\_Donald, on Twitter, on lots of  
14 different places.

15          Q    Okay. Okay. And generally this sort of hidden message asking -- saying  
16 that "will be wild" is a message to tell people to be armed, that would not be kind of the  
17 directed language that would've concerned you at the time?

18          A    I mean, again, we look at this guy and we think this is one of the Q people.  
19 He's just a harmless role player for the most part. As long as he's not saying -- he's not  
20 saying "I'm going to be armed" or "this is how I'm going to get guns there" or "I'm going  
21 to break the laws of this State," then it would've been -- I mean, yeah, is it kind of, you  
22 know, kind of uncomfortable to read maybe? Sure. But was it legally protected  
23 speech, I -- I'm not a lawyer, but it looks like it is to me.

24          Q    And so the sort of concern about incitement was, would you say, lessened by  
25 the presumption this guy was, as you said, LARPing?

1           A    Oh, yeah. Without a doubt. This -- we would've been less concerned with  
2 this guy. I mean, he's going by NamelessKing. "Will be wild" is -- I mean, as soon as he  
3 said it was a hidden message, we would've kind of: Yeah, okay this guy is kind of out  
4 there.

5           Q    So, I guess, why -- if it's just a guy who is out there spewing conspiracy  
6 theories, why keep it up?

7           A    Again, people were venting.

8           Q    Okay.

9           A    So there was talk inside of the team about people venting after the election  
10 and letting people vent, you know, not trying to over moderate.

11          Q    Got it. So kind of giving the benefit of the doubt to some folks who were  
12 grabbing on to these messages and things of that nature?

13          A    As long as it wasn't something like "here's how you break the law," "here's  
14 how you get a gun into D.C.," "go shoot this person," "go shoot these group of people,"  
15 things like that, yeah, we would have allowed a lot of it. We would've given a lot of  
16 leeway to these people.

17          Q    Interesting. And just because of the -- what was happening at the time?

18          A    Like I said, venting.

19          Q    Yeah. And so --

20          A    That was the specific thing that we talked about as a moderation team was  
21 people are going to say some things; some of it's going to be stupid. Obviously, if it's a  
22 directed threat or a call to violence, you know, delete the comment at the very least, and  
23 if you think the user is bad, ban them. If it's not specifically against our rules, kind of  
24 just watch the person, make sure it doesn't turn -- because something like this obviously  
25 could go from this first message, four messages down, he could say: And here's what

1 I'm going to do. So --

2 Q Right.

3 A -- I'm not saying we ignored him completely. We definitely had people like  
4 this on our radar. And, if we had seen -- let's say 2 days later he had gotten reported for  
5 something that was "here's how I'm going to get my gun to D.C.," we would've gone back  
6 and seen that, and we would've removed it. And, if it was bad enough, it was "I'm going  
7 to get my gun to D.C. to kill X or to do this," we would've also reported it to the FBI.

8 Q Okay.

9 A Or I say "we"; I would have had I seen it. I think most of the moderation  
10 team would've as well, but I can't speak to all of them obviously.

11 Q Right. And so this conversation about venting, was that different from the  
12 conversations that the moderation team was having internally about not wanting to  
13 remove some of this content?

14 A Yeah, yeah. I mean, it was -- so it was probably November 7th or  
15 November 8th, somewhere around that timeframe where we said: Yeah, people are  
16 going to say some things. Some of it's going to be bad. Some of it is going to be things  
17 that we would normally remove. But, as long as they're not breaking our rules very  
18 specifically or breaking a law, let's kind of give them a little bit of rope so people could  
19 vent.

20 Q But were there some moderators who were going beyond that, or that was  
21 sort of the divide?

22 A I think that allowing people to vent was a fine idea for like the first week or  
23 two, but it went all the way to the point where I left.

24 Q Okay. So --

25 A And, you know, if you give a mouse a cookie --

1 Q And, in your mind, was there a point where the venting tipped over into  
2 calling for violence?

3 A I'm not sure if it was -- well, so, yes, some of it was calling to violence, but I  
4 don't think the moderation team was really allowing most of that. Some of it was, like  
5 the guillotine, how to build a guillotine or how to tie a noose. That's where I -- that's  
6 where I was drawing my line was when that became the new okay. That was -- that was  
7 not okay in my book. And between that and the Washington -- The Wall Street Journal  
8 was going to do a piece on me, you know, between the -- all of that, I said: You know,  
9 this is my point.

10 Q Got it. And we will get to that soon, toward -- kind of once we get to the  
11 6th.

12 I guess on that note -- this is all really interesting -- [REDACTED] can we actually  
13 switch to exhibit 7 now, because I'm curious about building on this point of venting versus  
14 something more than venting.

15 And so here you have another thread talking about Trump pinning the January 6th  
16 "be there, be wild" tweet, and then the second response is: He cannot be any more  
17 clear that this is the call which --

18 A Can we blow this up a little bit?

19 Q Sure.

20 A Oh, you know what, I see how to do it on my side. Never mind. I've got  
21 it.

22 Q Yeah, there's a little --

23 A Yes, I've got it. Okay. Go ahead. I'm sorry. I didn't mean to interrupt  
24 you.

25 Q No, all good. So he says, the first reply, MAGABrain: He cannot be any



1 more clear that this is the call.

2 And then when you go a little bit further down you have -- I'm trying to find it:  
3 He needs to put the fear of God into the deep state. It requires millions of us to  
4 physically be there.

5 So what I'm seeing in this is, again, more of a coalescing around the 6th, but that  
6 still wouldn't really, in your mind, go towards past the venting phase?

7 A I mean, you're showing four people talking out of a million or so. No, this  
8 would've been nothing. This would've been a Q person, again, reading what he wants to  
9 read. I'm not saying that there weren't other comments like this. I'm sure there were.  
10 But this is one, two, three, four people going back and forth and getting, what, a total of  
11 200 up votes between all of their comments not even, I don't think, out of, again, 1  
12 million or so active users on a daily basis. This probably was never reported to us.  
13 That's -- so it's highly unlikely any mod ever saw this.

14 Q Does that, to you, speak to a shortcoming in the user moderation system  
15 or --

16 A Not necessarily. I mean, where's the -- what's the -- what thread was this a  
17 part of? Where's the thread?

18 Q I'm not sure. We have the URL, but --

19 A Was it part of a thread that had 100 up votes or 10,000, you know?  
20 Because if it's a thread that had 100 up votes, then you could be talking about 100  
21 likeminded people, and that's it. So, yeah, there might have been 100 people out of a  
22 million that were all saying the same stuff. But if we're talking about a thread that made  
23 it to the front page and had 8,000 or 10,000 up votes, well, then, okay, maybe this was a  
24 lapse in the community. But I can't say that based on what you're showing me.

25 Q Okay. I mean, I guess, my question would then be, obviously, sometimes it

1 doesn't take tens of thousands of people; sometimes it just takes a couple of dozen, or  
2 one. You were just talking about El Paso, but that doesn't seem to be your concern here  
3 or the concern of these kind of posts, the different types of posters? I'm just trying to  
4 understand.

5 A You said you had the URL. Can you post it? I could comment on the  
6 further --

7 Q As soon as we have it, I'll post it. But I'm --

8 A Okay. Yeah, if you want me to comment on it, I need to see the actual  
9 thread, because --

10 Q Okay.

11 A -- to me this small bit of comments means just -- if it had like 1,000 up votes  
12 on one of them, it would maybe be more important. But as it is, this is basically nothing.  
13 This is more role playing amongst four people. And one of them is they're telling them  
14 they're being stupid, just like I would've.

15 Q Right. Okay. Fair enough. We could take down the exhibit,

16

17 And so I guess now I'm interested in asking about if you ever -- if there was ever a  
18 point where you perceived that the LARPing was becoming something that was not  
19 LARPing anymore, regarding January 6th?

20 A Regardless of whether I thought it was LARPing or not, I thought the  
21 guillotine and the noose was going too far.

22 Q Okay. Okay.

23 A I thought at the point where you're saying "this is how you can make  
24 weapons to execute people in D.C." was too far, for me.

25 Q Okay. And so do you remember about when you were seeing that -- when

1 you started seeing that on the site?

2 A It was almost 1 week before January 6th on the dot. It was -- I believe it  
3 was literally 1 week before that I removed the noose post, and then the guy put it back  
4 up.

5 Q And that was --

6 A Which the Department of Justice has all that. I don't think I have that  
7 anymore. I looked for it. But they did have the -- I know when I communicated with  
8 them, I actually got them that stuff so that they do have it somewhere.

9 Q So there was a particular post of a noose, and we have a couple of -- we'll  
10 show --

11 A It wasn't of a noose.

12 Q Oh, what was it of?

13 A A post of a noose I would just think is dumb. A post of how to tie a noose is  
14 suggestive, and I thought that was a little bit too much.

15 Q Okay. And then so you removed that and then --

16 A Yes.

17 Q -- Shadowman --

18 A So it wasn't just up there, let me be clear. It was up on the very top of the  
19 website pinned. One of our moderators had done that at like 3 a.m. And I woke up 7  
20 or so and saw it, and I said: Why the heck is this pinned? You know, this is stupid.

21 This should not be -- this -- so this -- it was the type of post that would've probably  
22 gotten no attention from a moderator until it was pinned because it probably would've  
23 gotten maybe 50 up votes, so we never would've seen it. It would never have made it  
24 even in the top 10 pages. So we never would've seen it. But the pinning is what got it  
25 so much attention. It had like 8,000 or something -- it had thousands of up votes

1 because it was pinned to the very top of the site.

2 And a lot of our users, they just up vote everything. They don't look at it. They  
3 just -- they up vote everything. So I removed it because it was pinned, and I thought it  
4 was inappropriate. I probably never would've seen it otherwise if it hadn't been pinned.  
5 But when I removed it, within I think a few minutes, Celtic put it back up, and he repinned  
6 it. At that point, I -- you know, knowing he was the top guy on the chain, I knew I  
7 couldn't remove it anymore, so what I did was unpin it, which is what I did, which should  
8 be reflected in my moderation logs, I believe.

9 Q That's interesting. I'm not sure if I found that in your logs, but I'll be sure to  
10 look for that.

11 A It should be there. I think it would be right around December 31st,  
12 January 1st, right around that timeframe.

13 Q Okay. And so that was the point where you thought some of this stuff on  
14 the site is going too far and you were going to step away?

15 A I had started to moderate less, and I was still dealing with Robert Davis a lot  
16 over the phone. I was reporting things. You know, I think I was already talked to  
17 Castlebury (ph) with the FBI about something. I was dealing with the Nebraska attorney  
18 general, who was looking into an issue. So, I mean, I was already busy with other things,  
19 but that had kind of convinced -- that was -- that was my point.

20 And then, you know, a mix of that and then the moderation over the next 2 weeks  
21 getting worse and worse and worse or, as I saw it, worse and worse and worse, you know,  
22 that was enough for me. And then they were going to write this article about me.  
23 We'll get to that, I guess, but --

24 Q Yes. Yeah, yeah, no. And actually I'm really interested in hearing more  
25 about how and why that moderation process kind of continued to break down as you

1 stepped away, to the extent that you're aware.

2 But, first, I wanted to circle back on the point about talking to the FBI. Were you  
3 talking to the FBI in the sort of December -- mid-December to late December period  
4 about threats related to January 6th?

5 A Not threats related to January 6th, just threats in general. I believe I was  
6 already talking to Mr. Castlebury (ph) by that time maybe.

7 Q Uh-huh.

8 A I was -- I think there was someone else as well, but I cannot recall their  
9 name, and I don't see them in my email. But, yeah, I mean, I was responding about who  
10 wanted to know about it. You know, if they had a concern about one of our users, I was  
11 the one responding to them.

12 Q Okay. So how many open -- were there open cases -- how many open  
13 cases were there with the FBI, could you -- in that December timeframe?

14 A I can't tell you with the FBI, but, in general, between the FBI and the  
15 Nebraska AG, I think there was three or four people that I was getting requests for, you  
16 know, information for.

17 Q Okay. [REDACTED], I don't know if you have any questions?

18 [REDACTED]

19 Q Yeah. Sorry, my headphones are bad. Just to make sure I heard you  
20 correctly, you don't remember any requests from law enforcement specific to January 6th  
21 posts?

22 A Not that I can recall. I mean, there were some posts in the last -- or there  
23 might have been some requests like right after or shortly after January 6th, but, you  
24 know, I left the week after that. And the messages I did get I think from Mr. Castlebury  
25 (ph) and maybe a few other a people, I just told them, I said: I'm not with the site

1 anymore. You need to go talk to them.

2 Q Do you remember any like in the -- like the day before or 2 days before  
3 January 6th?

4 A No. No, I don't remember any. I'm not saying they weren't there, but if  
5 they were, they got lost in -- but I don't think so. I don't recall. I'm looking at my  
6 emails. Let me look, FBI.Gov.

7

8 Q Did they ever give you any warning about things to look out for in general,  
9 like threat-landscape-wise for January 6th?

10 A So, no, they -- they weren't communicating with us proactively, if that's what  
11 you're asking, absolutely not. I wish they would've.

12 Q Yeah.

13 A That would've been great, but, no, they were not.

14 Here's a message from the 6th of 2021 from FBI.Gov from a Heather Ritter (ph)  
15 asking me to disclose user data on somebody. So I would've responded to that. I don't  
16 recall it exactly. It looks like it's an emergency disclosure request about a user named  
17 Mr. Cheesemaker.

18 But, you know, I would've responded to their request and said the same thing that  
19 we always did, which is we don't have any user information on them because we didn't.  
20 You know, we didn't -- we didn't keep email addresses. We didn't keep anything really.  
21 We -- even their IP addresses we kept scrambled --

22

23 Q Understood.

24 A -- encrypted. So there was -- I didn't even have access personally to  
25 the -- to the encrypted IP address. I mean, Doggos would've been the only person I

1 know of that would've had that.

2 Q Got it. And, to your knowledge, did any of the other moderators or the  
3 other people I guess up the food chain a little bit, did any of them get requests for law  
4 enforcement for January 6th posts?

5 A Not that I know of. I'm pretty sure what they typically did was they'd  
6 contact our registrar, which was Epik, which had my name, and so they'd get in touch  
7 with me. And then, like I said, after I left, which I believe was January 13th, all of those  
8 requests, they'd email me, and I would just say: Here's their contact information on the  
9 website. This is where you contact a moderator. I'd give them the link, and I'd say:  
10 You know, you need to contact them. I have no access to the data.

11 Q Great. Thank you very much.

12 [REDACTED]

13 Q Thank you, [REDACTED] Appreciate that.

14 A But let me be clear, sorry. Even before I left, the way I got access to the  
15 data was going to Doggos and saying: Hey, I need all this stuff for this user.

16 So it was still not me taking it and acting on the request. It was me forwarding  
17 the request, getting the data that we did have, and then providing that to whoever was  
18 requesting it.

19 Q Got it. That makes sense.

20 So in that -- you said the last week before January 6th when the instructions on  
21 how to tie a noose --

22 A Make a noose or build a guillotine, there was a few different posts like that,  
23 yes.

24 Q Right. Right. Beyond that, were there other pre-planning activities that  
25 you saw that concerned you in those last weeks and days before the 6th?

1           A    I mean, you got it in your exhibit.  Some of those posts were pretty stupid, I  
2 thought.  I mean:  Here's the tunnels in D.C.

3           A    Come on, man.  Yeah, because those are accurate.  I'm not saying they're not,  
4 but as far as I know those look like some idiot at home with MS Paint trying to, you know,  
5 stir up trouble.  But, yes, if you're asking were there other things that bothered me,  
6 those type of posts absolutely bothered me.

7           Q    Yeah.  Yeah.  So what was your reaction to some of those posts about the  
8 tunnels, for example?

9           A    It was telling people:  This is stupid.  We can't have these up.  
10           A    Like the one idiot -- there was one idiot who said:  Bring chains and locks so you  
11 can keep doors from being open from these people leaving.

12           A    You can't do that.  To me, that was close enough to a directed threat because  
13 you're -- you have an idealized group of people you're targeting, right, politicians in D.C. --

14           Q    Right.

15           A    -- and you're saying barricade them in, which would be unlawful restraint,  
16 kidnapping, et cetera.  That's a directed threat.  To me that's an absolute -- absolute  
17 ban, absolute removal, absolute report.

18           Q    So, in those last days before the 6th, you were seeing things that were close  
19 enough in terms --

20           A    Like that that moderators were approving that was beyond my tolerance  
21 level.

22           Q    So you were seeing these specific threats against essentially lawmakers in  
23 the joint session on January 6th that moderators -- other moderators were -- were not  
24 taking down?

25           A    It wasn't like every moderator wasn't taking them down, but there were a



1 few that were approving them. And so there's a button where you can click "ignore  
2 reports," and then other moderators don't see any more reports on them either. And  
3 my suspicion is that -- and this is purely speculative. I didn't see it. I don't -- I can't  
4 recall a specific post. But I would not be surprised if some of those posts that would've  
5 upset a very large number of the moderation team and had them removed, somebody  
6 had clicked that so that they wouldn't be notified on that anymore.

7

8 Q Would that action be caught in any moderator logs or moderation logs?

9 A I'm sorry; you broke out.

10 Q My fault. Would that action have been caught in any of your moderation  
11 logs that you provided --

12 A I mean, not --

13 Q -- or anything else?

14 A If I clicked "ignore," you would see it in the logs that I provided you.

15 I -- that's not something I typically did. Clicking that was a no-no for the most part,  
16 very -- you know, there were very limited reasons we approved that for people. But,  
17 yes, if the website -- if somebody did do that, the website would've logged it; I'm  
18 99.9 percent sure.

19 Q Thank you. And not to step on your toes here, [REDACTED] figure you  
20 probably are about to ask this anyways, so how many of those like tunnel posts do you  
21 remember seeing? Were there a lot of them, or was it one that caught your attention?

22 A I remember -- I can't tell you the name of the user, but I remember there  
23 was one or two users who were posting those damn pictures everywhere. They  
24 posted -- they'd make the post. They posted as comments in other threads. They  
25 were -- they were posting it in lots of places.

1

2 Q Could we take a look at one of them just as we're discussing?

3 [REDACTED] can you pull up exhibit 32, just to see if you recognize this one. Is this the  
4 one?

5 A I mean, I can't tell you that that's the one, but I can tell you, based on this  
6 guy's username and everything here and the one up vote on the thread, that looking at  
7 this we would've seen this if it was reported as a LARPer. We would've probably banned  
8 the account because it's a brandnew account with no up votes, posting something pretty  
9 damn controversial.

10 I'm pretty sure, if this had been reported, it would've been removed immediately  
11 regardless of if we thought it was a legal or illegal post because, I mean, it's a brandnew  
12 account, 01062021MAGA. I mean, it looks like somebody just trying to be provocative  
13 and cause trouble.

14 Q Got it.

15 Well, go ahead, [REDACTED] I didn't mean to interrupt.

16

17 Q Oh, no. Keep going.

18 A I've seen this picture though. If you're asking if I've seen this picture, I have  
19 seen the picture. I'm not sure I've seen it from this user, but I've seen the picture.

20 Q Okay. So this was in other places on TheDonald.win then, even if this user  
21 specifically you can't recall?

22 A I've seen it somewhere else. I would imagine it would probably have been  
23 on TheDonald.win, but, yes, I have definitely seen it more than just in this post.

24

25 Q Got it. If we could actually back up for a second. We can get back to the

1 tunnels because I wanted to ask about something else related to the gallows and the  
2 nooses.

3 If we could pull up exhibit 10, [REDACTED]

4 And this is really helpful. Thank you, Mr. Williams. So do you recognize this as  
5 the post that you were talking about?

6 A No, that is not the post I was talking about.

7 Q Okay.

8 A The post I'm talking about specifically said how to tie -- it was how to tie a  
9 noose.

10 Q Okay.

11 A And it literally had one, two, three, four, I think, instructions.

12 Q Okay. Do you remember this -- does this post ring a bell, Day of the Rope?

13 A It doesn't really ring a bell. I mean, 205 up votes, that might seem like a lot  
14 but it's not.

15 Q Okay.

16 A That would've -- that would've been maybe like three pages off the first  
17 page, maybe four or five, so, no.

18 Q And do you know what the Day of the Rope is a reference to?

19 A I mean, I know about the Day of the Rope, yes.

20 Q Was that something that was -- just to be clear, that's the -- from "The  
21 Turner Diaries" and race traitors being hanged?

22 A Yes, I understand.

23 Q Yeah. Was that something that was commonly on the website?

24 A Not that I am aware of, no. No. I mean, we did our best to remove racist  
25 content. My guess is that either a moderator never saw this or a moderator saw it and

1 didn't understand Day of the Rope.

2 Q Okay. And there was something else that I wanted to confirm that we've  
3 been seeing in some of these posts, the reference to "in Minecraft." Do you know what  
4 that is about?

5 A Yes.

6 Q Okay.

7 A So I believe it started with Discord and Reddit and Twitch banning people  
8 who were saying, you know, "I want to kill that guy" or "I want to beat this guy up or  
9 something." So people started saying, "Gosh, I really want to hurt such-and-such," in  
10 Minecraft.

11 Q Okay.

12 A It was stupid, juvenile behavior by people who were foolish enough to  
13 believe that would protect them.

14 Q So how were you -- how did -- at least in -- if you had your druthers about  
15 content moderation, how would you have dealt with that kind of language in Minecraft?

16 A I mean, it just depends what came before it. I mean, if they say, "Look, I  
17 really want to beat this guy," I mean, beat him how?

18 Q Right. But --

19 A Obviously, if they said, "I want to hang this person in Minecraft" or "I want to  
20 shoot this person in Minecraft," to me that would've been a -- if there's a name or a  
21 group, that's a directed threat.

22 Q Okay. Got it. That's helpful. Something that we had been puzzling over  
23 a little bit ourselves, so that makes more sense.

24 Could we bring up exhibit 30, [REDACTED]

25 So here, again, you have: Let's build the gallows on the steps of the Capitol.

1           A    Yep.

2           Q    "Don't let your memes be your dreams," which kind of goes to some of the  
3 LARPing conversations we were talking about.

4           A    So you're never going to believe this, but we would have read this as a  
5 Democrat trying to cause trouble.

6           Q    Why?

7           A    He's literally just using all the buzz words, just copying buzz words.   When  
8 that's what you do, it's -- it was pretty obvious to us that -- this is how we would've  
9 moderated, okay.   I'm not saying this literally is a Democrat, but this is how we  
10 moderated.   People who just basically threw out every buzz word that was out there,  
11 they typically threw up warning signs for us, especially on Reddit.   I mean, this person  
12 would've probably been banned almost immediately off of Reddit.

13          Q    Okay.   How about here?

14          A    I mean, you know, again, you're talking about 255 up votes.   This would not  
15 have been very highly posted or highly visible.   But Sunlessmage743, I can tell you, 743,  
16 so they haven't posted anything in a year as of right now, and it looks like they -- you  
17 know, they didn't really post a ton back then.   Yeah, they literally have two pages worth  
18 of posts total, comments total.   Their number of posts are -- they have one, two, three,  
19 four, five, six posts total and they're all from right there in the same time.   So, yes, we  
20 would've seen this as a Democrat trying to stir trouble and ban them if we had seen the  
21 post.

22          Q    Okay.

23          A    I mean, memes be dreams, sic semper tyrannis, traitor.   I mean, this guy  
24 just screams troublemaker.

25          Q    Got it.   Got it.   That is useful context.

1           A    I'm not saying he is, but this is the type of post that we -- that, when  
2 reported, if we had seen this, I would've seen this and immediately thought this guy is a  
3 plant trying to make us look bad.

4           Q    Right. Obviously that -- that did end up happening, and folks did build a  
5 gallows outside the Capitol.

6           A    It was also like 4-foot tall.

7           Q    But either way, you would've -- if you had had this report --

8           A    I don't think they were planning on hanging children.

9           Q    Either way, you would've wanted to remove this post if you had had it  
10 reported to you?

11          A    I would've removed this post specifically because this guy was a Democrat.  
12 This guy was a plant. If he was one of our guys really trying to stir stuff up like this,  
13 these weren't the words he would've used.

14          Q    Okay. What kind of -- I'm just trying to understand more like, what would  
15 they have sounded like if they were a Trump supporter?

16          A    They would've couched everything. They would've -- everything would've  
17 been almost in code. This isn't code. This is copy/paste. That's what this is. And, I  
18 mean, like I said: Don't let your memes be dreams, sic semper tyrannis, traitor justice.

19                This is the type of guy who goes back to Reddit and says: Hey, I got these guys to  
20 think I really wanted them to go build a gallows.

21                That's what we would've read it as. Again, I'm not saying that's who it is, but  
22 that's what we look at and see this. You know, who's with me? Come on. This guy is  
23 full of crap.

24          Q    Understood. So maybe we could take a look at some of the other posts we  
25 have, and we could understand --

1           A    There are real posts out there.  There are absolutely in some of them.

2           Q    -- try to understand what the real -- what you would perceive as the real  
3 folks being --

4           A    Yeah, this one I never would have.

5           Q    Okay.  Got it.  Before we move on from this one, I don't know, [REDACTED]  
6 if you had anything else or -- no, okay.

7           So if we could go to exhibit 34 now, [REDACTED]

8           A    So, I'm sorry, let me go back one second.

1

2 [5:29 p.m.]

3 The Witness. I'm sorry, let me go back one second.

4 [REDACTED]

5 Q Sure.

6 A You guys haven't been reading these guys' posts for 4-1/2 years. I have.

7 You learn to -- you learn to spot the people that are full of it. You learn to

8 spot -- especially from our time on Reddit, the guys, the moderators that have been on

9 Reddit got a lot of experience dealing with plants, because there were tons of them.

10 There were tens of thousands. In fact, the majority of our posts that got us in trouble

11 were from people that were not even Trump supporters. They were people who had

12 come in just trying to get us in trouble.

13 So you learn to spot them. You learn to see the language. And you also learn

14 to see the people who are true supporters. And you also learn to spot the true crazy

15 people out there, like the guy who had the determination to get reported like a dozen

16 times and change his sentence one word each time to try to figure out what got through.

17 That guy is trouble. That guy is real trouble.

18 Q Understood.

19 [REDACTED]

20 [REDACTED]

21 Q Yeah. In terms of the gallows, it bothered you, right, the idea of tying the  
22 noose? And then you mentioned about the one at the Capitol was only 4 feet.

23 In retrospect, though, are you more concerned about seeing these posts about

24 how to construct a gallows, given that one showed up in Washington, D.C., on January

25 6th?



1           A    I mean, if they had built a 12-foot-tall gallows like they really are, I'd be very  
2 concerned. I mean, if they had actually shown up -- I mean, as far as I know, I don't  
3 think anybody, at least any of the Trump protesters, were arrested with guns or bombs or  
4 anything.

5           So, you know, the people who -- the talkers talked. The people who showed up,  
6 for the most part, were just people who followed the wrong people into buildings.  
7 That's for sure. But they weren't -- they weren't the guys making these posts. The  
8 guys making these posts are just troublemakers, for the most part.

9           Q    Do you think the guys making the posts, though, can ever influence the  
10 people who actually are acting?

11          A    I mean, that's what they want. I mean, obviously, that's what the guy from  
12 9chan wanted. He was very -- so when I described it, I think, to a reporter, it might have  
13 been to the Department of Justice, I was trying to explain how I spot real fanatics.

14          Real fanatics, like the guys from 9chan, are terrorists. Those guys are terrorists.  
15 And they are patient, and they are determined, and they will post, like that guy did, over  
16 and over again. And they also know that they might not win today or tomorrow. They  
17 might not win for 5 or 10 or 20 or even 50 years, maybe not even in their generation, but  
18 they're going to keep trying. Those are the dangerous, dangerous people out there.  
19 And the guys on 9chan are definitely actual dangerous people.

20          And, yeah, the stuff that that guy was posting and what he was hoping to achieve,  
21 that was scary. The people posting the picture that they just copied off of Google,  
22 they're just LARPer. I'm not saying that some of them aren't hoping that something  
23 would happen.

24          Some of them were hoping something would happen because they're  
25 accelerationists. In fact, I think a lot of the people that were rooting on -- for something

1 to happen on January 6th couldn't care less if Biden or Trump were President. They  
2 just -- they were accelerationists, hoping something bad would happen, period. So, you  
3 know.

4 Q Understood.

5 [REDACTED] Sorry to step in, [REDACTED]

6 [REDACTED] No. All good, [REDACTED]

7 [REDACTED]

8 Q So when you were saying those folks were accelerationists, did that start to  
9 concern you about what might happen on January 6th, based on some of the content you  
10 were seeing on the site, whether or not it was really premeditated, as you were saying,  
11 9chan or 8kun folks, or people who were a little bit more impulsive?

12 A I definitely believed that towards -- right that last week or so before January  
13 6th, that the Trump supporters, the actual Trump supporters were being more and more  
14 pushed to the back, and the accelerationists, the troublemakers were being pushed to the  
15 front and were being louder and louder and louder.

16 So you're asking me if they -- they were hoping -- I mean, if they could affect  
17 people, I mean maybe. I think the good news is that, for the most part, I don't think  
18 they did, you know, because none of the things that they hoped would happen  
19 happened, thank God, you know.

20 No politicians were locked in buildings. They weren't drug out and hung  
21 or -- and nobody showed up with guns, thank God. But did some of those people hope  
22 that happened? Yeah, of course. I think you're silly if you don't think so. But I  
23 don't --

24 Q Obviously, Members of Congress were evacuated pretty quickly before the  
25 mob broke in, and there were individuals with --

1 A Mobs don't walk inside of cordons, man. Come on.

2 Q Sorry, what? I didn't catch that.

3 A Mobs don't walk inside of the cordons and listen to guards who are asking  
4 them to please stay within the lines. That's not what a mob does.

5 Q Well, we can get back to that.

6 Can we bring up exhibit 12 -- or, sorry, exhibit 11, for our conversation.

7 So this is a quick post edit. I was actually going to ask the Minecraft point here  
8 and that sacking of Washington (in Minecraft), if you would just explain that. But --

9 A Can we move the exhibit 11 to page 1, please? I don't think I was able to  
10 move them on mine, my copy.

11 Q Actually, we could bring up -- okay, go ahead.

12 A Oh, thank you. So, I mean, if you all haven't taken the time to look up  
13 these users, I would highly suggest it, one by one, because, I mean, a lot of what I find  
14 when I do is people that were there and gone, not all of them, but a lot of them.

15 Yeah, they were people who showed up like right after the election and then, you  
16 know, they were there through January 6th or so and then they disappeared.

17 Q But couldn't that be because that was when they were active on the site,  
18 and then after January 6th they were --

19 A Oh, sure. No, absolutely. I'm not trying to speculate on why they were  
20 there. I'm just saying that they weren't our, quote/unquote, "users." They were -- our  
21 users are people who have been, you know, with The\_Donald from Reddit. You know,  
22 they have been there for years and years and years.

23 This guy specifically look like he does have quite a lot of posts and comments.  
24 He's been around. It doesn't look like he's there anymore, but he was there for a good  
25 while it looks like.

1 Q And if we could move to exhibit 12, which is just a zoomed-in version of his  
2 icon. That's the Capitol on fire. Would that icon have raised concerns?

3 A I mean, are you going to ban Olympus has Fallen next?

4 Q Well, I'm wondering, there was --

5 A I'm pretty sure this is from the movie. I mean, it looks like a scene from a  
6 movie.

7 Q It does. But, obviously, the President was also tweeting about January 6th  
8 and the joint session, so I was wondering if that would have been taken into  
9 consideration.

10 A Again, this is LARPing. I mean, that's what this is. If  
11 somebody -- especially since he added the stupid in Minecraft stuff. This is just some kid  
12 who thinks, you know, I can say this and get away with it since I put in Minecraft at the  
13 end of it. I mean, no rational adult thinks like that.

14 Q Okay. Understood.

15 Can we switch now to exhibit 27.

16 A I'm sorry. Let me be clear. There's not to say I wouldn't have removed  
17 this if it had been reported. If he had added the in Minecraft thing to anything that was  
18 reported and I saw, I would have removed it for that alone, just because, I mean, one, it's  
19 stupid; and two, to me that is kind of a directed threat, because that's -- maybe you're  
20 using code words, but you're -- code words to me is the same thing. It's a directed  
21 threat. So if I had seen this, I would have removed this. But I never saw that.

22 Q Okay. And so then, this maybe, at least in my reading, gets a little bit away  
23 from LARPing. You have a post about not a rally or a protest, and then you see -- if you  
24 scroll down a little bit, you can see a perimeter around the Capitol complex.

25 And so would you still put this in the live-action-role-playing category?

1           A    So that post is still up and alive today. Give me a second. Do you have a  
2   date for that post?

3           Q    This is -- I'm just talking to someone else on my team. It's exhibit 27. We  
4   can get you a date on that post.

5           A    Because -- okay, so this -- 488 upvotes is enough that it would probably be  
6   on the second or third page, maybe fourth. So it would be a little bit down, especially at  
7   that time. We were getting a ton of posts. But I would say that this is something I  
8   most likely, had I seen it, would have removed, because I agree with you. I think this  
9   is -- this is starting to go beyond just LARPing.

10            They're telling people stay here, stage here, and make a perimeter, and here's the  
11   tunnels. And yeah, this to me would have been too much. But, I mean, I need a date  
12   on it. It means nothing as it is.

13           Q    So was this the kind of thing you did see circulating on the website in the  
14   days before the 6th?

15           A    I can't specifically remember seeing this, but -- or this specific one. I would  
16   say there were things maybe similar --

17           Q    Well, obviously, there were tons of posts. What about maps, that kind of  
18   thing?

19           A    Oh, yeah. Like I said, people -- I saw people post the tunnel map stuff.  
20   This would have probably been the most kind of intricate one of them. Like I said  
21   earlier, I think most of them I looked at and thought somebody had just drawn up on, you  
22   know, Microsoft paint, but this one looks like somebody, you know, went -- I think it said  
23   somewhere that this was out of a magazine somewhere on one of the other exhibits you  
24   showed.

25           Q    Bloomberg, I believe.

1           A    Yeah, Bloomberg, that's what it was.   So somebody went and got this from  
2 Bloomberg and just reused it.   So it's still pretty low effort, but, you know, adding the  
3 create a perimeter, this is not a protest, surround the enemy and do not let them leave.

4           You know, do not let them leave, that's illegal.   That's kidnapping, illegal  
5 restraint, unlawful restraint, you know, to me.   This would have needed to be removed,  
6 if I had seen it.   I'm not saying I didn't.   I don't recall seeing it.   I don't have a date on  
7 it.   It's possible this is from who knows when.

8           But it looks like -- I mean, it definitely looks like they're insinuating that this was  
9 about January 6th.

10          Q    Yes.   Well, I'm just trying to get a better sense of whether or not the  
11 general mood amongst the moderators was that there was something going on beyond  
12 LARPing in these final days before January 6th.

13          Is it something that you discussed with others, something that you felt was not  
14 shared by other moderators?

15          A    So there were -- we had a discussion at one point, because there were  
16 people who were trying to like organize buses and travel and places to stay.   And  
17 because of that, that leads to potential doxing.   So we had had a discussion around that  
18 aspect of it, because we didn't want our users doxing each other.

19          So our discussion ended up getting kind of directed around the organizing and  
20 such as well because of that.   And the thought was that, you know, they have a Discord  
21 channel where they're talking about this stuff that has nothing to do with us.   They have  
22 Telegram and Signal and Twitter private messages.   They have all these other -- other  
23 channels.   So try to keep this stuff off the site.

24          Obviously, this is -- this is what I would consider a pretty bad miss.   488 upvotes  
25 is enough -- it's not going to be on the front page.   It's probably not -- at this time, when

1 the website was very, very busy, it probably wouldn't have been in the top three pages,  
2 but this one should have been caught. And it's still up to this day --

3 Q Yeah.

4 A -- so, you know.

5 Q Right. We have -- I could drop the URL. Well, what do you think of that?

6 A Well, I mean, like I said, to me, this is a directed threat. This is a call to  
7 violence, unlawful detainment, kidnapping. That's illegal. This should have been  
8 removed.

9 Q Understood. That's helpful.

10 [REDACTED] [REDACTED] I know that you wanted to follow up on the point about  
11 buses and organizing.

12 [REDACTED]

13 Q Yes. You started to talk a little bit about people organizing travel. Were  
14 you seeing maps circulating about like caravans coming to Washington, D.C., on  
15 TheDonald?

16 A I mean, I've seen it in various places. I think I saw it on Twitter more than  
17 anywhere, from various groups saying, You know, this is where we're going to be. This  
18 is the cities we're going through. I'm pretty sure Twitter is where most of that went  
19 through.

20 But, like I said, when they -- when it started on our website, we had a discussion  
21 about it, because we've always -- we were always of the opinion that we shouldn't  
22 encourage people to meet up, because that causes people to get doxed, and we didn't  
23 want people to get doxed. We took privacy very seriously.

24 So, you know, when people started talking about that sort of stuff, we -- we  
25 removed most of that. I'm not saying all of it, but I'm pretty sure the vast majority of

1 here, meet us here, that type of stuff we removed.

2 Q So were you removing the maps as well, the caravan maps that --

3 A Sorry?

4 Q Were you removing the maps as well or just removing posts about where to  
5 meet up?

6 A I don't -- I couldn't specify. The maps, the maps I recall more on Twitter  
7 than on our site, though.

8 Q Was that a user -- do you know the user Dr. ENoCH on Twitter?

9 A I don't know that person, no.

10 Q And on TheDonald.win, did you see things like that were titled MAGA  
11 Cavalry?

12 A I saw -- I recall seeing something with that, yeah.

13 Q Were those the types of things that you were taking down?

14 A It depends. You know, if it said, Meet us here, we typically removed it  
15 because, like I said, we didn't want people to be doxed.

16 Q We might have an example of one. Let's see. One second.

17 [REDACTED] if we can pull up exhibit 33.

18 [REDACTED] Can you guys hear me? Can you all hear me?

19 The Witness. I can hear you.

20 [REDACTED]

21 Q Mr. Williams, was this one of those posts that you saw on TheDonald.win?

22 A This is a post that I do recall seeing on the TheDonald at one point, yes.

23 Q Unfortunately --

24 A Or it's a picture. I say post. I should say it's a picture.

25 [REDACTED] Let's recess in place really quickly.



1 [Recess.]

2 [REDACTED] Let's go back on the record quickly.

3 [REDACTED]

4 Q So, Mr. Williams, I asked you if this is one of those maps that you had seen  
5 on TheDonald.win.

6 A It is a picture that I have seen, and I saw it on at least TheDonald, but  
7 probably on Twitter as well.

8 Q Okay. And you don't know the origin of this post?

9 A I couldn't tell you who made it, no.

10 Q Unfortunately, it's a bad quality photo, but in the original, I'll represent to  
11 you it's a map of the United States, and you see all these lines converging in Washington,  
12 D.C., with different meet-up points, and there are bigger maps we talked about.

13 A Uh-huh.

14 Q Was this something that TheDonald.win would have seen as a threat along  
15 the lines of surrounding the Capitol, or is it -- it was more just purely about doxing that  
16 you were worried about it?

17 A Still -- it was about doxing, but not just doxing internally. We were worried  
18 also about, like, our -- our users showing up and then somebody else, a bad actor being  
19 on the outside there to take everybody's pictures or to, you know, infiltrate the group,  
20 things like that.

21 So, I mean, we -- this was typically something that we would have removed. I'm  
22 not saying that we did. I don't really recall. But I can tell you for my entire time with  
23 them prior to January 2021, we would have always removed this before, because  
24 meet-ups are dangerous.

25 Q Got it. So are you familiar with a group called MAGA Drag the Cavalry?

1           A    I mean, I've heard -- I've heard about all these groups that you've mentioned  
2 so far, yes.

3           Q    Is that a group that originated or posted a lot on TheDonald.win?

4           A    I don't recall.

5           ██████████ Thank you very much.

6           Go ahead, ██████████

7           ██████████ Great. Thank you, ██████████

8           ██████████

9           Q    And to return to the point we were discussing earlier with exhibit 27, Mr.  
10 Williams, we looked at the URL, and that was posted on January 5, 2021, at 7:15 about, a  
11 little before 7:15 p.m.

12          A    Okay.

13          Q    So that's just a couple hours before the Capitol was breached.

14          A    Okay.

15          Q    So that kind of would confirm your view that this is something that should  
16 have been removed?

17          A    This -- this is something -- look, as I said, regardless of when it was posted, I  
18 would remove this because you're telling people to illegally restrain folks. That's a  
19 violation of the law, which is a clear violation of our rules.

20                I mean, to me, it doesn't even need to get up to the point of the election. I'm  
21 not saying the election and January 6th and the inauguration aren't important. I am  
22 saying that this is so bad that I would have removed this on May 20, 2020.

23          Q    Got it. Got it. That is helpful.

24          A    But it's because of things that stayed up like this that I started, you know,  
25 like I said, feeling like the moderation team was getting too lax and it was time for me to

1 go.

2 Q Right. So there's actually one other -- one or two other posts that are like  
3 that that I wanted to just ask you about. One is exhibit 6, if you don't mind,

4 [REDACTED]

5 And so, this is, it seems like a threat against -- a pretty clear threat against the  
6 Secretary of State of Pennsylvania, who was obviously involved in some of the litigation  
7 around the election, hereby convicted of treason and sentenced to execution on the 6th  
8 of January 2021 by dragging her out of her home.

9 Is this the kind of thing that would have -- should have been removed? It wasn't,  
10 but should have been removed?

11 A I mean, you're talking about a post with 31 upvotes. It's highly unlikely  
12 very many people saw it at all. Obviously, only 31 people upvoted it. It looks like 31,  
13 yeah.

14 Yes, it should have been removed. I'm not saying it shouldn't have. But there's  
15 a good chance this was never reported. And let's see. Her name's not in it. Her  
16 address isn't in it. So a bot wouldn't have caught it and reported it to us automatically.

17 It says -- can you remove the exhibit 6, please, because it says, "drag out of her  
18 home." What's underneath there? I mean, if it -- if it lists an address or a phone  
19 number and it wasn't removed, that's a miss, because even if no user reports that, it still  
20 should have been caught by the bots.

21 Q It says "in Minecraft," it seems like.

22 A Oh, geez. Idiots. Sorry. I don't mean to laugh, but I mean, these people  
23 were everywhere putting "in Minecraft" in stuff. And, you know, they say -- they use  
24 that in Discord a lot, because I believe that's where it started was in Discord. Discord  
25 was banning people for that sort of stuff, so they started saying "in Minecraft" so they

1 could say, look, we're talking about games.

2 And as a person who was running our Discord server, you know, I had many  
3 conversations with some of our users, especially the younger ones, telling them, you're  
4 really dumb if you think that's going to protect you. So I look at this and I kind of get a  
5 little chuckle, because this person was stupid enough to think that's going to protect  
6 them.

7 But, yeah, it's very likely this wasn't reported with only 31 upvotes, especially if it  
8 was around January 6th. It would have been a very busy time. So a ton of posts were  
9 coming in. I mean, we're talking I think 10,000 posts a day on an average day. Some  
10 days were much, much worse than that.

11 So it's possible no user reported this. And if her address, her name, things like  
12 that, you know, PII, personally identifying information, was not included in the post  
13 anywhere then a bot wouldn't have caught it either.

14 Do I think this should have been removed? Yeah, sure, absolutely. But, you  
15 know, somebody knew -- that's the thing. You can read this, especially with "drag her  
16 out of her home." This is somebody who knew how our bots worked, knew that we  
17 would have banned it if he added the address or her name, and very specifically made  
18 sure not to.

19 Q So I mentioned earlier, I asked earlier if there were any efforts to sort of  
20 program the bots to pick up some of this inciteful activity.

21 A Oh, yeah.

22 Q Was there ever any discussion of adding a term like "execution" to the -- or  
23 "treason" to the bot list?

24 A So we had tried that one time on Reddit. And then it catches so much stuff  
25 unintentionally, you know, because, especially online, you have a lot of people that talk in

1 strange ways.

2 And so they use execution for like running programs is what they mean. And it  
3 catches so much stuff that it's not useful. It becomes detrimental, in other words. I  
4 know that sounds crazy, because you and I hear execution and that's what we think  
5 immediately, killing somebody. But when we had tried that on Reddit, it caused more  
6 troubles than it solved. Treason, no, I mean, we would never have banned treason.

7 Q Okay. Well, I have a couple more exhibits I wanted to run through on the  
8 sort of posts, and then we can move on. And if you're okay going, I think we can be  
9 done in a half hour or so.

10 A Okay.

11 Q So the next I wanted to go to was actually posts about being inside the  
12 Capitol and then occupying the Capitol.

13 The next one is 37, if we could bring that up, [REDACTED]

14 This one might be the one you were talking about, bring handcuffs and wait near  
15 the tunnels.

16 A No, no, the one I'm talking about very specifically said chains and locks.

17 Q Okay. This one has almost 400 upvotes it looks like, 369 or 89. Is this  
18 something that should have been caught?

19 A Again, so, it depends on the day, you know. If this is posted on January 6th,  
20 for instance, or January 5th, two of our busiest days ever, it's possible 369 upvotes is like  
21 10 pages down. If it's posted on May 15th of 2018, this would have been on the front  
22 page, and we should have caught it, absolutely. So it's hard to say.

23 Q Is this the kind of thing that other moderators would have let slide or not?

24 A I think -- well, no. I mean, without a doubt, there's some moderators who  
25 will let everything you've shown me slide. There's one or two moderators who would

1 let all of it go through, and one of those was ShadowMan. He would have left almost all  
2 of it go through, you know.

3 Q Right. So they weren't really moderators then, they were just kind of  
4 curators?

5 A Well, I said in one of my interviews that I believe it's very possible  
6 ShadowMan voted for Biden, because he's an accelerationist. I never really believed  
7 him to be much of a Trump supporter. I firmly believe he's an accelerationist.

8 Q Got it. One second. Oh, so this post was January 3, 2021, so just a couple  
9 of days before.

10 A So it would have been a very busy day. I don't know how busy, but it would  
11 have been a pretty busy day with January 6th coming up. Who knows what page that  
12 went to. I can't tell you at this point. I don't think there's any way to find out either.  
13 But it definitely wouldn't have been very high up with only 369.

14 I mean, the top posts on those days, you know, coming into January 6th, I think a  
15 lot of them had like 10 to 20 thousand upvotes. They were very busy.

16 Q Got it. Were there any efforts -- I know you were -- it seems like you were  
17 stepping away from the moderation team in the days before the 6th, but were there  
18 efforts to try to get through more of these posts, because it seems like what were these  
19 posts about? Were they posts that needed to be removed? How were you trying to  
20 figure out that increased volume, sift through it?

21 A So, I mean, my role was almost completely contained -- I mean, I did some  
22 moderation. I'm not saying I didn't. But it was almost completely contained to just  
23 responding to external requests and comments from Epik, dealing with them from the  
24 beginning of January.

25 So, you know, I would have -- I would have missed a ton of this, which is

1       unfortunate because, like this one, bring handcuffs and wall near the tunnels. I mean, I  
2       would have said, you're trying to restrain people. That's -- that's a close enough of a call  
3       to do something illegal that I would have removed it, I would have.

4               I think this one probably wouldn't have been removed by a very large portion of  
5       our moderation team, because it's not specific enough is what I think a lot of people  
6       would have said.

7               Q     Even given the impending activity in D.C. on the 6th?

8               A     No. That's January 3rd when this was posted is what you said. So, you  
9       know --

10              Q     What I'm saying, it's a couple days --

11              A     Things weren't quite so heated. Things got really heated January 5th, if you  
12       recall, the day before. Things got really, really heated. And the tone on the site was a  
13       lot different the day before than even just the 3rd. I mean --

14              Q     What were the posts like on the 5th?

15              A     It was, We're going in there, boys, you know. And I can't be specific but, I  
16       mean, if you -- if you pulled it up and looked at some of the archives, they were pretty  
17       gung-ho. We're going there. You know, lots of 1776 posts, things like that.

18              Q     Got it. There's actually one more.

19              [REDACTED] Sorry, [REDACTED]

20              [REDACTED] Oh, go ahead, [REDACTED]

21              [REDACTED]

22              Q     So on January 5th, did you start taking these posts more seriously than you  
23       would --

24              A     I was -- if you're asking me if I did, no, I was engaged with other things. I  
25       have a wife and three kids and I -- you know, I'm a disabled vet with only one leg and

1 really bad arthritis. So, you know, did I? No, I wouldn't have.

2 You know, like -- like the noose posts, that's the type of work I did on the site. I'd  
3 wake up in the morning, check the website. If I saw something egregious like a noose,  
4 how to tie a noose pasted at the very top of the website, I would have removed it, and  
5 then I would have gone about the other things I needed to that day, which was  
6 responding to FBI requests, responding to Epik, responding to the Nebraska attorney  
7 general, things like that.

8

9 Q Got it. Got it. That makes sense.

10 So at this point we can go to exhibit 38, which I think is the last in this category.  
11 Thank you for bearing with us.

12 A That's fine.

13 Q So it is a post and it says: "If we occupy the Capitol, there will be no vote."

14 And so, I wanted to ask you specifically about the idea of an occupation in the  
15 Capitol Building that would have the effect of delaying the certification of the electoral  
16 college. Was that something that you saw on the site pretty frequently?

17 A I mean, I saw various people make comments like that, not just then but like  
18 on Discord. And I can tell you more about the moderation on Discord, because you  
19 asked me what I was doing.

20 I was running the Discord server more than anything. And I'm not sure Discord  
21 had been banned by that time, because we did get banned. I forget when, but I think it  
22 was before January 6th a good bit, but maybe it wasn't. Maybe it was right after. I  
23 really don't remember.

24 Q So what was happening on the Discord server?

25 A But we saw some things like that and, you know, there were discussions



1 amongst -- I mean, again, we're talking about 20,000 or so users. And we -- you know,  
2 people like me would tell them, are you stupid, do you really think that's going to stop  
3 anything?

4 You know, they're not going to stop, you know, selecting the President because  
5 you occupy the building. They'll just go somewhere else and still do it, or they'll shoot  
6 you all and get you out and then still do it, you know. This is a very stupid idea.

7 That was the -- that was what I told people, and that's what I know our more  
8 mature users were telling the younger folks who said stuff like this.

9 Q So --

10 A Yes, I mean, did several people say stuff like this? Yes, certainly people did.  
11 They were all stupid.

12 Q And so, this post was on January 5th. I can give you the URL. And --

13 A I've already looked into it. Thank you.

14 Q Okay. It has 416 upvotes, so that again -- so, then, it probably would have  
15 gotten some traction?

16 A It's possible. Yeah, it's definitely possible that this could have gotten some  
17 traction. You said January 5th, right?

18 Q Yes.

19 A 416, I mean, it's still pretty low for January 15th -- I mean January 5th.

20 Q January 5th.

21 A If it was -- if it was a week before or 2 or 3 weeks after when traffic was  
22 lower, then this would have probably made it closer to the front page. But January 5th,  
23 this would have still been fairly far down. But, I mean, obviously 418 plus two people  
24 who downloaded it, that's 420 people saw it, at the very least.

25 Q Right. All right. Well, actually, now I want to move to the day of January

1 6th itself and just had a couple of questions there. I know you were in El Paso, right, or  
2 San Antonio?

3 A No, I was in San Antonio. The risk manager for the city actually lived in San  
4 Antonio at the time, believe it or not. He lives right across the street from me.

5 Q Sorry for the slip. But you were -- you were in San Antonio?

6 A Yes.

7 Q Okay. So were -- like going into that day, were you nervous about what  
8 was going to happen on the site or in D.C.?

9 A I mean, I think anybody who says they weren't nervous about everything in  
10 general was being -- was just naive.

11 Q What were you worried was going to happen?

12 A I mean, I'm still worried to this day. Look at the price of gas, man. I  
13 was -- I'm 43. Man, I wasn't worried about that day as much as I was worried about the  
14 future of the entire country.

15 Q Why was that?

16 A Again, I think it's kind of borne itself out pretty well. I got neighbors losing  
17 houses and jobs. And I know people go on the news and say the economy is doing great  
18 here and there, but that's not what my neighbors are living through.

19 So, you know, that's more what I'm concerned with. I understand that some of  
20 these younger people were a little bit looser and talked about really foolish things, like  
21 occupying the Capitol, but, you know, Presidents come and go. They always have in my  
22 lifetime, at least.

23 So, you know, I was much more concerned long term. And just -- I would  
24 definitely say I was nervous, because we had -- we have one of our -- one of our  
25 moderators had infiltrated an antifa chat room. And he had infiltrated a long time ago

1 and copied and pasted some of the things he saw out of there that definitely worried us,  
2 and we tried to warn our users about, which was, a guy got in there and said, This is how  
3 you blend in, you know. If you're buying a Trump hat, make sure you wash it first.  
4 Take the tags off.

5 I mean, it was pretty -- pretty specific instruction on how to blend in and make  
6 yourself look like you were part of the MAGA crowd. And so, yeah, I was extremely  
7 nervous about that. We -- you know, after Charlottesville, we got really good at spotting  
8 some of those people, because the people in Charlottesville, you know, you could  
9 see -- they showed up with flags that still had creases in them. They didn't even bother  
10 to, you know, wash them. They literally bought them on the way to the rally. They  
11 showed up with hats that had tags on them, things like that.

12 And we got really good at spotting these people and pointing them out to our  
13 guys and saying, these are the guys you don't want to be with. If you're going to a  
14 protest and you see these people, stay away from them.

15 Q So --

16 A So, yeah, we were real nervous going into -- or I was. And I think the guy  
17 who infiltrated the group was pretty nervous as well, because they had very, very  
18 detailed instructions that -- that basically broke down all the stuff that we had informed  
19 our users to look out for.

20 Q So you were more chiefly concerned about the infiltration by antifa?

21 A I was very concerned about agent provocateurs, yes, absolutely.

22 Q Got it. And not so much some of the content about nooses and  
23 perimeters?

24 A Well, sure, I was -- I mean, obviously, I was concerned with that, too, or I  
25 wouldn't have removed it. But I wasn't so concerned that those nooses were going to

1 turn into 12-foot gallows, because they didn't.

2 I mean, like I said, talkers talk. And I've been on the internet for a long enough  
3 time to realize that if you go after every single person who shows you how to draw a  
4 noose, well, the noose -- the internet would be a very quiet place, a very, very empty  
5 place, because people, especially younger people, they post and say stupid crud all the  
6 time.

7 And, you know, that's what -- that in Minecraft stuff should -- there's your sign  
8 right there. It was just -- it was a lot of juvenile people saying things that -- that, I don't  
9 know, they -- they thought made them sound cool, I guess, for the most part.

10 Q Right. Well, obviously, some people did end up breaching the Capitol that  
11 day, and I wanted to pull up something that is content on this site from amidst  
12 everything. Can we pull up exhibit 31.

13 So here you have a pretty blunt assessment of the situation. "Don't let them  
14 escape through the tunnels. Trap them and force them to hear the will of the people."  
15 Then beneath that: "Revolution, I like it. Attention all Congressman of the United  
16 States, we have assumed control."

17 Does this still strike you as the same kind of young person role playing sort of  
18 thing?

19 A What's that name that posted that?

20 Q Pikachu Johnson.

21 A That should answer your question. I mean, this is some guy who's young  
22 enough to have been into Pokemon, man. It's -- this is -- this is really, really stupid is  
23 what it is. That's what it is. And --

24 Q I had Pokemon as a kid. I'm 29. Most mass shooters are much younger  
25 than me.

1           A    You're right.  You're absolutely right.  Yeah.  That's scary, I guess.  But  
2   most mass shooters also leave manifestos and don't leave one-line posts, you know.  In  
3   fact, as far as I can tell, none of them do.  They use -- they are much more in detailed.

4           This guy would have just -- we'd have seen this and said, you're an idiot, which,  
5   you know, 46 upvotes.  That tells you what the community thought of his posts.  If you  
6   can only get 46 upvotes out of a million or so users, that -- I mean, that kind of tells you  
7   something, right?

8           Q    So you were not seeing significant traffic on January 6th encouraging the  
9   ongoing attack?

10          A    I saw significant traffic of lots of people posting lots of different things.  
11   Some people saying, Yeah, this is fantastic, this is awesome, we're all here getting  
12   together.  I saw plenty of posts saying, listen to Donald Trump who said, go down there  
13   and peacefully let your voices be heard.  And I saw these.  Not this one specifically.  I  
14   didn't see this one.  But I saw posts like this, yes.

15          But I saw posts from one side of the spectrum all the way to the other, and they  
16   were all over the place.  I can tell you what we were saying in moderator chat, which is, I  
17   hope they calm down.

18          And, you know, we saw the people start throwing the barricades like within  
19   seconds of Donald Trump saying, Let's go down there and peacefully let our voices be  
20   heard.  And the first thing we were typing in moderator chat was, I don't think those  
21   guys are with us because they're wearing all black.

22          Q    Right.  So the assumption was that that was antifa?

23          A    They very much were dressed like antifa, and they were acting like antifa.

24          Q    So, given what you were seeing on the website and on television, what was  
25   the conversation like in the moderator chat about trying to get a handle on what was

1 going on on the site?

2 A Like I said, so there was comments from all over the spectrum. There were  
3 plenty of people saying, stay home. There were plenty of people saying, this is  
4 awesome. And there were plenty of people, like this guy, who were encouraging really  
5 stupid behavior.

6 Moderator chat was -- you know, I'd have to go back and review it, which I think I  
7 have. But, as I recall, yes, there were -- there were probably one or two moderators  
8 who were upset and who were saying, Yeah, you know, this is great. But the vast  
9 majority of us were, you know, doing our jobs, which was removing, you know, calls to  
10 violence and things like that.

11 Q So you said this post up here, this exhibit is stupid. That was your word.  
12 We just checked. This was posted at 2:39 p.m. on January 6th. That was just 20  
13 minutes after -- 30 minutes after the first breach on the west front of the Capitol.  
14 Members of Congress were being evacuated actively as the mob was in the building.

15 Does it not seem like this is something more serious, calling for the assassination  
16 of elected officials, Don't let them escape?

17 A I mean, I don't see him calling for the assassination. Where is that? Don't  
18 let them --

19 Q How else would you take "Don't let them escape through the tunnels, trap  
20 them and force them to hear the will of the people"?

21 A I would take it as he said. He didn't say, Don't let them escape and kill  
22 them. Is that in there? That's not what that says, right?

23 Q So how do you read that?

24 A It says: "Force them to hear the will of the people." I mean, I'm not  
25 saying this is a good post. Again, I said this was stupid. But this is not a guy saying,

1 Trap them and kill them. He doesn't say, Trap them and put them in handcuffs. He  
2 doesn't say, Trap them and never let them go home. He says, Trap and force them to  
3 hear the will of the people.

4 Can I ask you how is that any different from the White House being surrounded by  
5 antifa, who were throwing barriers and calling for the White House to be stormed? How  
6 is that any different? I mean, this is what protests are, right, where you go and  
7 you're -- you go with enough people with loud enough voices so that politicians can hear  
8 you.

9 I mean, I'm not saying this is a good post. Again, I think he's stupid. Don't let  
10 them escape through the tunnels. The guy -- there is a clear insinuation here, I will say  
11 that, but --

12 Q Insinuation of violence?

13 A Insinuation of something untoward, at the very least. I'm not so -- I mean,  
14 trap them definitely doesn't sound good. Don't let them escape through the tunnels I  
15 don't think sounds good either. But he follows that up with force them to hear the will  
16 of the people, which is more benign than most of the posts you've shown today, right?  
17 Can we agree with that?

18 I mean, he doesn't finish it up with here's how to tie a noose or bring them to the  
19 guillotine. He finishes it with, Force them to hear the will of the people, which to me  
20 that's -- that's what the vast majority of people there that day wanted is to be heard.

21 Q Got it. Well, I guess we can --

22 A Again, if I see this post, I probably would have removed it, because I read,  
23 Don't let them escape, and I think that's unlawful detainment. That's enough for me.

24 Q Understood. So yes, the implication is violation of bodily integrity, if not  
25 more.

1           So we can probably move on. I have one other, two other questions -- we can  
2 take this exhibit down, ██████████ -- one or two other questions on this about, sort of,  
3 like, the actions that the moderators considered taking during January 6th.

4           There was never any discussion of trying to shut the site down or restrict posting  
5 on the site, freezing the site during the course of the --

6           A    I think I actually had mentioned maybe we wanted to do that. Somebody  
7 did, I think it might have been me, that it might be a good idea to put a timer basically to  
8 slow things down so we could moderate and get a grasp on things. But that was  
9 overruled, I know that.

10          Q    Okay. So why was that overruled, do you remember?

11          A    The people in charge just were very anti that. They just wanted people to  
12 be able to post and comment all the time whatever they wanted, basically.

13          Q    Even with what was going on?

14          A    Yes, even with what was going on.

15          Q    Okay. I mean, I think that's pretty much all the conversation I had about  
16 the 6th itself.

17                I do want to talk about sort of the decision to step away from TheDonald and sort  
18 of you disengaging from the site, but before I did, I did want to ask about some of your  
19 content moderation laws that you provided to us, and I think some of them might be  
20 illuminating, if you don't mind.

21                So the first is exhibit 24, and I had one specific question on this one. And here,  
22 towards the bottom -- sorry, it might be hard to find, but towards the bottom there's a  
23 comment that says "approved." And just to be clear, your username was CovfefeBucks;  
24 right?

25                A    Yes. He says: "I will kill and die for Trump."



1 Q Yes I was curious about that.

2 A Again, I mean, so that was 66 days before I left. That's 33 -- that's 2  
3 months before January 13th. So -- because I did this like right before I quit.

4 Q So that would be right after the election?

5 A Let me see. Probably. November 8th. There you go.

6 Q So that's the day after Biden was declared the victor.

7 A Yep. Yeah. I mean, he's not making a directed threat. So that's why  
8 that would have been lifted.

9 Q Okay.

10 A I didn't post it. I wouldn't have posted that, obviously. But he's saying I  
11 will kill in general and die for Trump. I mean, I was in the Army, man, what do you think  
12 I was there for? I would have killed and died for the President. I'm not saying that's  
13 what he's saying, but that's clearly free and protected speech.

14 Q Okay. And I --

15 A If you just put a name after kill or even a group, completely changes it.

16 Q Right.

17 A But I want to be clear. This is the entirety of that. That's a comment.  
18 That's the approved comment, not a post. So there's not more after that where he then  
19 was clarifying and saying Senators or this or that. That was the entirety of it. I will kill  
20 and die for Trump. That's it. Clearly protected speech.

21 Q Understood. And the other two things I want to ask about were posts that  
22 you did remove, and I was just curious about the sort of prevalence of this kind of  
23 information or how other moderators were dealing with it.

24 So the next one, if we go to exhibit 25, [REDACTED] Thank you for your  
25 patience with these exhibits. Exhibit 25. Sorry, I have to zoom back.

1           So here towards the bottom there is one that you removed that says, 27 days ago.  
2           This is -- this is right around when the President would have sent out on his tweet early to  
3           mid-December. Oh dear, it seems I have left the fax and email of every Congressman  
4           here, and this pretty clearly seems like something that you would have to delete as  
5           doxing, and also potentially a threat against public officials. And this has to do with  
6           Dominion audit returns.

7           So does that kind of activity, posting about dox information for elected officials,  
8           something that you saw often?

9           A     I saw it from time to time. This would have been removed because -- I kind  
10          of remember it, okay?

11          Q     Tell me about it, yeah.

12          A     I kind of remember it. And he did post a ton. I mean, it was huge, if I  
13          recall right. And there was no way to verify it. I was like are you kidding me, dude?  
14          Sorry for the sling there, but that's what we would have seen. We would have seen it  
15          and said, Are you kidding me? How do we verify you're not giving us a list of all your  
16          ex-girlfriends and getting us to call and harass them, you know, things like that.

17          So that's part of why you are very hard core when it comes to doxing is because it  
18          can be very difficult to verify all that stuff yourselves. But yeah, I mean, this was -- this  
19          was not good. I think I had also seen that some of this was potentially personal  
20          addresses, if I recall right. Like, he had actual, like, addresses and maybe the phone  
21          numbers were personal phone numbers.

22          Like if the post had been nothing but here's this person's office, and we can easily  
23          follow it up and confirm that was their office number, and they were an elected public  
24          official, we would have left that. But this was -- if I remember right, I think I remember  
25          this and it was -- it was impossible to have followed up on and it was possibly very

1 dangerous. So yeah, we removed it, or I removed it.

2 Q All right. I have one more on this, which is exhibit 26, and then I promise  
3 we are almost done.

4 A That's okay.

5 Q Are you still good to keep going for a little bit?

6 A Yeah, I'm fine.

7 Q Great. So here, there is a post, I believe it's towards the middle of the  
8 page: Civil War 2 is the best next step -- is the next step. It's 30 days ago, so that  
9 would have been around the middle of December, again.

10 A Yeah, December 14th or so.

11 Q So this predates President's tweet by a couple of days. And then you have  
12 firing squad now, December 13th or so.

13 Was this -- this discussion of Civil War, like violent Civil War, something that you  
14 saw a lot when you were moderating in the last month or so?

15 A I mean a lot? No, but, I mean, more than prior? Sure, yes, more than  
16 prior, absolutely. But a lot? I mean, you can -- you can tell by how much is on there.  
17 I mean, if I saw it, it was removed, as you can tell.

18 Q Right. I was asking generally your recollection.

19 A So -- no, what I mean by that is if I had seen it a lot, I feel like you'd probably  
20 see more of them being removed. But I saw it more. I'm not going to say I didn't. I  
21 did see it more. I heard people, or I heard -- I saw people type it in Discord more.

22 I was running Discord, so if I saw somebody type it in Discord, I removed it flat-out  
23 and typically put the guy in timeout for a bit to let them cool their heads. If they were a  
24 new user, I'd just flat-out ban them.

25 But yeah, you know, this was around the time -- because something that you

1 notice here is there's a remove, not -- and it's not followed by a ban. This was around  
2 the time where we were talking about, hey, let people kind of blow off some steam.  
3 People were upset, you know.

4 So if they had been a user for a while and they say something kind of dumb,  
5 remove the post, send them a message, but don't ban them as long as, you know, your  
6 message to them comes across.

7 And I can tell you if there's no ban for that guy shortly after that, it might have  
8 been within 24 hours because sometimes people took a while to respond, but if that's no  
9 ban within, like, 24, 48 hours of that post removal, that means the guy wrote me back  
10 and said, man, I'm sorry, I just -- I'm real upset.

11 Q Given what ended up happening, do you regret that decision to give folks a  
12 little bit of leeway?

13 A I think -- I think some -- some -- so I'm a fan of free speech, obviously. I  
14 think everybody should be allowed to talk. And I think 9chan is a perfect example of  
15 what happens when you try to stop people from talking. If you push people into the  
16 dark, they start talking like they're in the dark and they start thinking some dark thoughts.  
17 9chan is a perfect example of what happens to people that are nothing but silenced.

18 On the flip side of that, though, you can give people too much leeway. I'm not  
19 saying to speak. I think people should be able to say whatever they want. But this was  
20 on our website that we were in charge of, and it was supposed to be to help our political  
21 movement.

22 And in that regard, we don't have to allow free speech. And in that regard, I felt  
23 like we should have done more to protect our movement and the future of our  
24 movement and not think so much only about the next few weeks.

25 Q So in terms of helping your movement, wouldn't it make sense to ban folks

1 who are talking about Civil War?

2 A Yes, that's what I'm getting about. Yes, I'm sorry, that's what I'm getting at  
3 is it would have been beneficial for us to -- well, not ban them, to have not let it get that  
4 far, because this is a month after the election, right?

5 So this guy is seeing the buildup. He's, you know, seeing the posts before him.  
6 He's seeing what we're allowing more and more people to get away with. I don't blame  
7 him nearly as much as I blame the top moderator who said, let's let this stuff get worse.

8 Q I got it.

9 A Does that make sense? I'm not saying I condemn what he said. I'm not at  
10 all. But -- so he was one person in a crowd and the crowd was running in one direction,  
11 and he got swept up in it.

12 Q So you regret the fact that moderators let the crowd move in that direction  
13 for as long as it did?

14 A Yes. I think it would have been much more sensible to say, Hey, guys,  
15 we're going to give you 24 hours to vent. Obviously, still no calls to violence, still no  
16 doxing, still no direct threats, but we're going to give you about 24 hours to let off some  
17 steam, and we're not going to enforce the rules as strictly as we would otherwise. But  
18 after that, that's it. We're going to shut it down. I would have --

19 Q Essentially -- essentially what happened is that you never --

20 A That's right. It never got shut down.

21 Q It never got shut down.

22 A In fact, if you ask me, to some extent it's still going on to this day.

23 Q Got it. And that's because some -- you've left and there are other  
24 moderators who have left who might have had a more conservative view on this?

25 A The only other two or three like-minded -- well, so there were some

1 moderators that were on the Reddit site that were, like, you know, more my mindset that  
2 never made it to dot-win. But then there were, I don't know, maybe three, four at most  
3 that did make it to dot-win that -- you know, I think two of them are still there.

4 So they just gave tacit approval to it eventually and -- because there's a constant  
5 threat that if you do speak up or say anything like I was that you will just be removed.

6 Q As a moderator?

7 A Correct.

8 Q So I wanted to ask now about -- we can take this exhibit down,

9 [REDACTED] -- the sort of mounting pressure to shut down TheDonald.win after January  
10 6th. And if you could kind of tell me how that pressure was mounting in the days  
11 afterward, that would be helpful at this point.

12 A So let me be clear. I didn't shut down TheDonald.win, because I don't own  
13 the website. I own the name. I redirected the name eventually. But it had nothing  
14 to do with January 6th, really.

15 You know, I left and was happy to let them use the name as long as they weren't  
16 doing anything illegal with it. And I was behind the scenes discussing with two of them  
17 about transferring the name to two of them. We just hadn't worked it out yet.

18 The name -- I did take it down when they made me a target and I started getting  
19 death threats. At that point, you know, the way I described it to the reporters who  
20 asked me in the Department of Justice was, it's like walking around knowing you have a  
21 kick-me sign on your back. You don't just leave it there, you know.

1

2 [6:31 p.m.]

3

4 Q Right. So --

5 A So --

6 Q So what did end up happening? You did shut the --

7 A They made a post that -- so they made -- they bought another URL, another  
8 name, the one they're under now, Patriots.win. They made their very first post, and it  
9 was a post that basically did nothing but attack me. And I -- I mean, I woke up that  
10 morning when they made the -- the website live with death threats on my cell phone. I  
11 mean, people were following me on Twitter saying things, on YouTube, you name it. My  
12 phone just was ringing nonstop. It was pretty bad.

13 I didn't know what was going on, obviously. Like I said, I just woke up. I get up.  
14 I think it's got to be something to do with that, and I immediately try to go to  
15 TheDonald.win, you know. And it's got a redirect, and it says: We're now at  
16 Patriots.win. Click on this link or wait and you'll be redirected, right.

17 And it redirects to the site, which is exactly the same except the name is -- the URL  
18 has changed. And the very first post -- like I said, I saved it somewhere. I didn't think  
19 that was relevant to January 6th. It was more about me, so that's why I didn't provide it  
20 to you. If you want it, I am happy to, but it really just -- it was just a call to harass and  
21 attack me. That's all it was.

22 Q Why was that? Because of the moderation stance you had taken?

23 A Well, they were -- yeah, basically. I mean, they weren't happy that I had  
24 talked to The Wall Street Journal. The Wall Street Journal took some of what I said out  
25 of context, not too badly. People asked me about the different interviews I've given,

1 and I think for the most part they've been pretty fair, to be true. Not all of them, but  
2 The Wall Street Journal and the Washington Post were both very fair to me, I feel like.

3 But there were some things that were taken out of context in The Wall Street  
4 Journal that made it seem like I was calling all the members of The\_Donald racist, which is  
5 not what I was -- had told the reporter who wrote the article at all. But I guess  
6 they -- they took it that way when they read it.

7 And so they made this post, and they said, you know, "The former -- we can't trust  
8 him to leave The\_Donald up anymore because he thinks we're all racists," which I didn't,  
9 you know. I'm not saying I didn't think some people were racist. I think that  
10 Shadowman guy is a horrible, despicable racist, which is why I didn't just hand him the  
11 name, the URL in the first place. But, yeah, so that was -- that, I mean, the threats were  
12 too much. I took the website down so that I wouldn't be paying for my own  
13 harassment.

14 Q And then it just all transferred over to Patriots.win?

15 A Yeah, absolutely.

16 Q All right. Could we pull up exhibit 15, [REDACTED]  
17 We're getting through this. You see these emails, January 12th --

18 A You got very quiet. I'm sorry. It sounds like you're talking down a  
19 hallway.

20 Q Can you hear me now?

21 A That's a little better.

22 Q Okay. I had to -- my headphones died. How is this? Is this better?

23 A I can hear you okay. Thank you.

24 Q Okay. I'll try to project. So this email is from January 12th, and it's your  
25 contact at Epik saying that there is an interest in actions being taken by or posts on



1 TheDonald.win and basically warning that more might follow. So I was wondering if you  
2 could speak to some of those actions that related to January 6th and Epik trying to raise  
3 concerns about what was happening on the site.

4 A Let me see. January, that's the 12th, right?

5 Q Yeah. So there's a mention of only after Parler got taken off line did the full  
6 extent of their extremities and what they were truly publishing become aware to them.  
7 And they're basically saying that --

8 A So they were contacting us to give us a warning to clamp down on  
9 moderation because, after January 6th, they were, you know, worried that people were  
10 going to accuse us of being, you know, like the people who organized what happened  
11 that day, and because of that ICANN, you know, the internet name registry basically,  
12 would try to revoke our name, which didn't happen, obviously, but, you know, it's a valid  
13 concern.

14 And, you know, that's -- this email is what spurred my conversation with the top  
15 moderators to try to get things to calm down and try to ratchet things up, which resulted  
16 in them -- I mean, his -- so Celtic Wraithman ran TheDonald.win's Twitter account, and he  
17 went and posted a reply that was directed at Rob, Robert Davis, but it wasn't, you know.  
18 It was -- it was definitely to Epik, and they knew it was to them, but I think he left it very  
19 vague. But he was telling them -- excuse my language -- to fuck off.

20 And it was at that point that, you know, the conversation that evening got heated.  
21 And I said: This is not -- this isn't professional. This isn't mature. This isn't how we  
22 should handle a company that's been very good to us. They're -- they're trying to work  
23 with us. They're just asking us to make some commonsense changes.

24 I'd written up a list of changes that I thought was in that email somewhere but  
25 maybe it got lost that I submitted to the moderation team. And like I said then, he went

1 and posted "fuck off" on Twitter, which was very clearly -- Robert and Epik knew it was  
2 directed at them.

3 Q Right.

4 A At which point, I wrote my email to Robert explaining that I was stepping  
5 away because they're no longer listening to y'all, and if they're not going to listen to y'all  
6 when y'all are threatening to take the site down, they're definitely not listening to me,  
7 which means I'm no longer effective and I don't need to be here.

8 Q So at that -- we didn't get a chance to add your text that you just sent to us  
9 as an exhibit, but you --

10 The Reporter. I'm sorry, counsel, it is really hard to hear you.

11 [REDACTED] Oh, I'm sorry. Okay. Can you hear me now?

12 The Reporter. Yes.

13 [REDACTED] Okay. I'll try to speak loudly. Sorry about that. My headphones  
14 died.

15 [REDACTED]

16 Q Okay. So, in your text messages with Robert, you say on January 12th that  
17 they basically shot everything down --

18 A Yes.

19 Q -- the other moderators. So that's what you're talking about here is that  
20 you had a set of proposals that they've rejected and then --

21 A Well, I had submitted my proposals to Robert first because --

22 Q Okay.

23 A -- he was making it pretty clear that we were on the edge of losing our  
24 domain name. He said, you know: We're getting pressure from the guys we buy  
25 domain names from, and they're getting pressure from ICANN above them.

1           And I -- I had gone to -- I had written up a list of suggestions that I'd bounced off of  
2 Robert, and he said: Yes, this is all good. Can you work with your team?

3           I took it back to the top moderators into a private chat, which was just the three  
4 of them, another normal moderator, a guy who goes by FVI (ph), and myself. I  
5 submitted it all. I have -- or I had all this chat saved somewhere. I'd have to find it.  
6 But they basically said, like I said, F off, at which point, you know, I said: Look, between  
7 this and The Wall Street Journal going -- is going to release my name in a few days, I don't  
8 need this.

9           Q Understood. Understood.

10          So at this point -- getting towards the end here -- I want to pull up exhibit 19.

11          A Yeah, this was the day before.

12          Q Right. So, if we could scroll down, you can see that there is some selected  
13 posts here. For example, January 17th, we are going in arms. And I believe if we scroll  
14 down a little more, [REDACTED] -- essentially, I wanted to ask you if you were worried  
15 about continuing threats of violent after January 6th, for example, on January 17th or the  
16 inauguration based on what you were seeing on TheDonald.win?

17          A I mean, were some things said that I thought was inappropriate? Sure.  
18 Was I worried about threats of violence from people who immediately left after  
19 January 6th? No. I mean, again, I look at these people and I think: You know, you're  
20 role players. You're just -- you're talking a lot and trying to stir up trouble but you're not  
21 trying to do anything.

22          So -- and I'm going to bring this up myself because I think it was in the subpoena.  
23 So one of the comments in the subpoena was about a post that I made that doesn't  
24 include all the context where I say: Washington must fall. I, even to this day, I think  
25 D.C. needs to be broken up.

1           But more of that post or the context surrounding it was a post that went more  
2 into detail about I was explaining to people that the veterans after the Civil War, after the  
3 Spanish-American War, and after World War I, did it the right way. They went, and they  
4 stayed. They pitched tents, you know, on the White House lawn and such and didn't  
5 leave until their concerns were addressed.

6           And I don't have any of my posts from TheDonald.win. I deleted my account  
7 when I quit. I wish I had saved all that stuff. I'm sure there's ways to get it, but I didn't  
8 save it. But the post goes on about that. It says basically: If you're going on  
9 January 6th and then leaving the next day, you're going to accomplish nothing, you know.

10           And so, yeah, to me these people are doing nothing, because the veterans of  
11 those wars, they came, they stayed, they made their voices heard, and some of them  
12 were there for weeks and weeks on end camping out on the White House lawn, and to  
13 me that's -- that's how you, you know -- that's -- that to me is political protesting and  
14 trying to accomplish a goal.

15           Telling people to go and rebuild SCOTUS and Minecraft and stuff like that is just  
16 idiotic and childish. And, as we've seen, these people were all talk and, you know, they  
17 weren't willing to go and sit down and try to wait for them -- wait for people to listen to  
18 them, otherwise they would've stayed, you know. They would've stayed until they were  
19 heard, but they didn't.

20           Q    So on that note [inaudible] --

21           A    You're very quiet again. Sorry.

22           Q    Sure. Sure. We've touched on this a couple of times, but I wanted to ask,  
23 in light of your explanation there, what do you think happened on January 6th? Do you  
24 think there was a mob?

25           A    I mean, I wasn't there. You're asking me to speculate on things that I saw

1 on television that were presented by reporters with a bias, you know, and -- or through  
2 telephone videos that were very limited in scope. I mean, I wasn't there. I've heard all  
3 sorts of things.

4 I've -- I can tell you, the only thing that I saw, which was a bunch of people dressed  
5 in black throwing barricades within a minute or two of Donald Trump telling people to go  
6 peacefully protest, that's the only thing that I saw that I can directly comment on,  
7 because I thought that was despicable.

8 And, you know, the moment it happened I didn't believe that was our people, and  
9 I still don't believe that was our people to this day. But that doesn't mean our people  
10 didn't go and get swept up in it. They very well could have, and I think some of them  
11 did. I think, you know, the idiots who took Nancy Pelosi's laptop, for instance, I mean,  
12 come on, you know. You're not protesting. All you're doing is stealing something that  
13 probably has top secret clearance material on it or likely to, and you're just going to get  
14 yourself in a world of trouble.

15 So I don't know what happened that day. I do know that some people, without a  
16 doubt, got out of hand. But I also know that I wish -- wish to God people had just  
17 actually listened to Donald Trump say let's go down and peacefully let our voices be  
18 heard. But they didn't -- or some people didn't at the very least.

19 Q So do you think that acting sooner on some of these posts on TheDonald.win  
20 would have made any difference in preventing some of the violence, some of the police  
21 officers who were hurt, some of the damage to the Capitol?

22 A That's hard to say. I mean, I have no control over Twitter or Reddit or  
23 Facebook where, many, many, many more thousands of these posts were made. We  
24 were a blip in the ocean compared to Twitter, compared to Facebook, compared to  
25 Reddit, compared to Discord even. We were nothing compared to those sites.

1 I can tell you that the groups that were trying to do the organizing had a Discord  
2 server. I wasn't a member of it so I can't tell you what was in there, but that's where -- I  
3 mean, if you're worried about somebody actually trying to collaborate and plan to do  
4 something wrong, that's where you need to be looking, because --

5 Q Was that the Militia Discord server?

6 A I don't know who it was. I wasn't a member of the group, like I said. I just  
7 know that there were people in the Discord who talked about being members of the  
8 group, and they said it's another Discord server. And I had nothing to do with them. I  
9 didn't want anything to do with them.

10 Q So, at the end of the day, what do you think TheDonald.win's role in the  
11 events of January 6th was?

12 A I mean, the same as -- like I said, the same as any other social media. No  
13 different. We just happened to be focused on Trump more so than them, but we didn't  
14 have the same volume as them.

15 Q Do you think there were failures in your moderation policies or your  
16 moderation practices both before the 6th?

17 A In mine, no.

18 Q In the site's?

19 A Perhaps. I mean, like I said, I mean, you can tell by the stuff that I've told  
20 you I removed that was put back up that I didn't disagree -- I didn't agree with what was  
21 going on moderation-wise in some aspects, not in all. I thought letting people vent for a  
22 little bit was probably a good idea, but, sure, it went on too long, and like I said, I still feel  
23 like it's going on to this day.

24 Q And I just -- we don't have to bring it up, but exhibit 2 is the Washington Post  
25 article that features an interview with you --

1 A Yeah.

2 Q -- you if you're familiar with it. And, in that article, I believe you say that  
3 there was QAnon ideology on the website, on TheDonald.win post that involved  
4 Holocaust denialism, racism, and that eventually that was part of why you stepped away  
5 from the site. Could you comment on those posts -- go ahead.

6 A Sorry. Go ahead.

7 Q No, can you comment on the -- that dynamic, the sort of --

8 A You're not going to love this, but that's another out-of-context, inaccurate  
9 quote. So what I had told them was the guy who was running the site was a Holocaust  
10 denier and a pretty devout racist, and Shadowman very much is, you know. He literally  
11 sat there one day with me for, I don't know, an hour trying to explain why the Holocaust  
12 wasn't real. My brother is a Jewish convert, you know.

13 Q Oh, online talking?

14 A Yes, on Discord. Yeah, on Discord. You can imagine I took that really  
15 wonderfully, but I let the guy run his mouth, you know, for a long time.

16 Q Okay.

17 A I remember -- and I don't think this quote made it into their article, but I  
18 remember telling Craig that the guy got engaged one day, and he was -- I think this wasn't  
19 when he got engaged but he was going to get married and he made a comment, not like  
20 in a private group. This was in the full moderation team. He said: You know, the  
21 only reason I'm marrying her is because she's more Nazi than me.

22 And, I mean, that was his actual comment, and it just -- you know it's disgusting.  
23 That's all there is to it, I mean, because he was being very serious.

24 Q Got it.

25 A He was being very, very serious. So I do not, did not believe that the

1 majority of our users were racist. I think -- you know, I know a lot of those users. They  
2 don't know that I'm -- I was the one who owned the site for the most part or on the -- I  
3 say the site, sorry. I'm using y'all's term. I was the one who owned the name, but I  
4 know a lot of people, and they're just normal people, you know.

5 My friend down the street, he browsed that site and never knew I was involved  
6 with it, just a normal guy with two kids and a wife. My wife's aunt, normal lady, two  
7 kids, flies balloons. You know, there's nothing racist or Nazi about any of those people  
8 that I know. But the guy who was in charge very much was, and that's what I was trying  
9 to tell Craig and it -- to me that was a big mistake in his article because that was  
10 important. I thought that was extremely important.

11 Q Understood.

12 A He's not there anymore according to the website.

13 Q Shadowman?

14 A He was -- yeah. Well, he went by Celtic or Celtic Wraithman on that  
15 website.

16 Q Do you know who is in charge?

17 A I do not know anymore. It looks like -- I mean, if you look in the order of  
18 moderators, which is typically the order of importance kind of, it's got Doggos at the very  
19 top, so, yeah, the guy who programmed the site. But Celtic is not listed on there. That  
20 does not mean he's not there, let me be very clear. That just means he's not listed there  
21 anymore. Actually, I -- did he go by Shadowman on here? Maybe he went by  
22 Shadowman.

23 Q That's what I thought.

24 A I think he went by Shadowman on here.

25 Q And I guess, my final question --



1           A    Yeah, he did.

2           Q    -- and you can -- okay.

3                   My final question, and then we can wrap up, is that we did talk a lot about  
4 whether or not to take some of these folks seriously who are posting on TheDonald.win.  
5 And I'm still struggling with the idea that a lot of what was posted there, whether it was  
6 talking about tunnels, surrounding the Capitol, erecting gallows, whether they be 12 feet  
7 tall or a bit shorter, ended up happening.

8                   And so I do wonder how you square that circle of these events unfolding off line  
9 and live -- the live action part of live-action role-playing really digging -- coming into play,  
10 and how you think about those events when considering this -- TheDonald.win's  
11 trajectory over those last few months in 2020?

12          A    Are you an attorney? You seem like you must be, right?

13          Q    I am.

14          A    So you've studied the Supreme Court's stance on rhetorical hyperbole, I  
15 hope. It's pretty broad because the last time they ruled on it, the guy was saying he was  
16 going to kill the President, and they ruled that that was protected speech because he was  
17 an activist and was clearly not actually intending to kill the President.

18                   And I'm not saying that I agree with anybody saying some of those things. I think  
19 some of that stuff is probably inappropriate, but people saying, you know, building a  
20 4-foot gallows is not saying "I'm going to hang you." It is political hyperbole. That's  
21 exactly what it is. It is saying you are doing things that are rising to this level. Maybe  
22 we're -- if -- in fact, I would say they're very clearly saying you're not here yet, but this can  
23 go from 4 foot to 12 foot if you get to that point.

24                   And I think there are people in every single nation on Earth that believe that  
25 24 hours a day, 365 days a year. And some of them are reasonable and some of them

1 are unreasonable, but as long as we're building 4-foot gallows and 4-foot guillotines,  
2 that's speech, because it's useless. It's speech. It might be very harsh speech, it might  
3 be speech that you don't like, but it's very clearly protected by our Constitution. If  
4 they -- if they go out there and build tall gallows or a full --

5 Q What about entering the Capitol and looking for the Speaker of the House in  
6 hallways underneath the Capitol?

7 A Did anybody go in hallways underneath the Capitol? I haven't seen videos  
8 of that. I mean, I'm not saying they didn't. I'm just saying I haven't seen it.

9 Q Well, I can represent to you that there was underneath the rotunda pretty  
10 well-publicized footage of individuals calling out the Speaker's name.

11 A Okay. I haven't seen that. I believe you. I'll stipulate to that happily. I  
12 believe you. How many people were in Washington, D.C., that day? Can we say that  
13 there were hundreds of thousands probably? Let's say there were 20,000. Are 20,000  
14 not enough to storm the Capitol and kill every single person in there if they really wanted  
15 to? Yeah. 10,000 was; 5,000 would've been enough.

16 But, instead, what you got was maybe 400 to 500 that behaved really stupid.  
17 And for the most part, by stupid we're not talking about chasing after trying to kill people,  
18 we're talking about sitting on desks stealing iPads, yelling the Speaker's name. I'm not  
19 saying these are good things. I'm not. I'm not defending them. But it's clearly not an  
20 insurrection. An insurrection, everybody in that building would've been dead, because  
21 there were more than enough people to accomplish that.

22 Q Understood.

23 A As a former soldier who studied quite a few stands amongst small groups by  
24 bigger groups, much larger groups, the small groups always die no matter how well  
25 armed they are. I mean, the only time in history you can find that they didn't for the

1 most part was Rorke's end, I believe, the Zulus and the British. And the British mostly  
2 died, and they only survived at the end because the Zulus started to respect them for the  
3 strong stand they did take and because -- it was Rorke's Drift, I believe -- and because  
4 Rorke's Drift was a distraction from another movement that they were using further away  
5 to attack a much larger force.

6 So, you know, I'm not saying what happened was good. I'm not trying to defend  
7 them, let me be very clear. But it's silly to call it an attack or an insurrection because  
8 everybody would've been dead if it had been. And it would've been a horrible day  
9 because nobody would've won that. Everybody would've lost that day. So we should  
10 all thank God that that didn't happen.

1

2 [6:54 p.m.]

3

4 Q Thank you for the answer.

5 So I think I could move to some concluding questions now. I first wanted to ask  
6 about how -- your conversations with the FBI, you said you spoke with the FBI about the  
7 events of January 6th?

8 A I don't know if about January 6th. Well -- okay. I spoke with the DOJ, and  
9 I think they had an FBI guy in. But I don't recall --

10 Q I guess, since January 6th, have you had conversations with law  
11 enforcement, Federal law enforcement?

12 A Department of Justice. There was a proffer session.

13 Q Was there things they asked about that were different than what we talked  
14 about today?

15 A One, you're asking me for things that they told me I wasn't allowed to  
16 repeat.

17 Q Well, I don't want to do that. So anything you can't say, don't say.

18 A I was just told I wasn't supposed to repeat any of that stuff. I haven't to  
19 this day.

20 Q So then don't do that here.

21 Is there anything that we should have asked you about that we didn't ask you  
22 about?

23 A Fishing expedition. I mean, I think you were fairly thorough, to be frank. I  
24 mean, I think y'all are probably focused on TheDonald.Win more because of the name  
25 than anything. If you're really looking for any kind of planning or anything, if it was on

1 TheDonald, it was in PMs, which we never would have seen. But Twitter was heavily  
2 used. I do know that. Telegram; Signal; What'sApp; Facebook. I mean, that's where  
3 most people communicated from. So -- and I know that from people asking me to get in  
4 and try to talk to them. And you know, like I said, I wanted nothing to do with it. So I  
5 didn't join.

6 Q Uh-huh.

7 A I'd like to be as thorough as possible because I don't want to come back here  
8 and talk to y'all again to be honest. At the same time, I don't want to offer something  
9 that I'm not completely solid on.

10 If I do find the chat logs -- the pictures, is what I did, of the chats from the last day  
11 before I left the moderating team that night, I'll send them to you. I'm happy to provide  
12 that. It will tell you basically what I just told you, which is, Robert and I had a  
13 conversation. We tried to work through how to make the site a little cleaner and  
14 address some of ITM's concerns. I went to our moderator team with it. They told us  
15 to "F" off. And that was kind of it.

16 Q Yeah. I was going to say, if there are -- any moderator chat logs would be  
17 responsive. So please get those over to us if you do have any.

18 A I don't think I have anything else. Like I said, you were very thorough. I  
19 appreciate it.

20 Q And I appreciate the search for materials so far.

21 A If I find something, like I said, please don't come knocking on my door. I'll  
22 happily provide it if I find it.

23 Q Yeah. No. We're happy you've been making these diligent searches.  
24 And if you do come across something else, please do send it my way.

25 A What -- I mean, the data to the site is all under that control of the guy

1 named Doggos, who's still on the site. If that's who you're looking for, that's who you  
2 need to talk to. As far as I know, he's a British citizen and doesn't live in America.

3 Q Okay. I think at this point, the thing that you mentioned that would be  
4 most responsive would be the moderator chats.

5 A Yeah. I'll see what I can find.

6 Q Great. All right. Well, unless anyone has anything else, I think that we  
7 can wrap this up.

8 Do you have anything to say before we close, Mr. Williams? Thank you for your  
9 time today.

10 A No, that's fine. The majority of the moderation team are good people. I  
11 just want to defend -- the vast majority of them. One or two, maybe three bad eggs,  
12 and then one or two people who said things in heat of the moment that they didn't mean,  
13 venting off a little bit of steam. For the most part, they were a good group.

14 It was unfortunate that the guy that was in charge was in charge. But that  
15 literally was because they copied the structure from Reddit and pasted it to  
16 TheDonald.Win. And if you ask me, that was the biggest mistake we made. That was  
17 very unfortunate. You know, we didn't really select him as the leader when we were on  
18 Reddit either. I don't know if you know how their administration works. But if you get  
19 to the top of the line, you're the top of the line. That's kind of what happened. He just  
20 kind of fell into place.

21 But part of the problem is, on Reddit, the guy at the top has ultimate authority.  
22 He could literally kill the entire subreddit, ban every single moderator, and delete every  
23 bit of content. So the guy got in charge, and people got afraid of him. And that's kind  
24 of what they lived under. And it's unfortunate because I think a lot of this could have  
25 been avoided with better leadership, mature leadership. Not racist leadership would

1 have definitely helped.

2 Q All right. Well, thank you for those comments, and I think with that, we can  
3 stand in recess subject to the call of the chair.

4 And we can go off the record at 7:02 p.m.

5 [Whereupon, at 7:02 p.m., the interview was recessed, subject to the call of the  
6 Chair.]

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Certificate of Deponent/Interviewee

I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

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Witness Name

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Date