

Sines v Kessler

 Rousseau, Thomas (Vol. 01) - 07/22/2020

1 CLIP (RUNNING 00:47:58.626)

 Rousseau Vol 2

TR02 149 SEGMENTS (RUNNING 00:47:58.626)



1. PAGE 26:19 TO 26:21 (RUNNING 00:00:08.726)

19 Q. Vanguard America operated a website
20 at www.bloodandsoil.org; correct?
21 A. Yes.

2. PAGE 29:11 TO 29:17 (RUNNING 00:00:24.028)

11 Q. Is it your understanding that the
12 phrase "blood and soil" was used by Nazis?
13 A. Yes.
14 Q. And you understand that that phrase
15 refers to an ethnic identity being tied to
16 specific geographic territory; agreed?
17 A. Sure, yes.

3. PAGE 32:16 TO 32:24 (RUNNING 00:00:25.466)

16 Q. Vanguard America used Discord to
17 communicate; right?
18 A. From my personal recollection, yes.
19 Q. And it used Discord to communicate
20 with its own members?
21 A. To communicate with some members.
22 There was communication, whether it was
23 exclusively members or others, I'm not exactly
24 sure.

4. PAGE 33:21 TO 34:08 (RUNNING 00:00:37.212)

21 Q. Okay. But Vanguard operated
22 different servers and channels on Discord;
23 correct?
24 A. Correct, like -- yeah.
25 Q. And part of the reason Vanguard used
00034:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 Discord was to plan and organize the Unite the
03 Right rally that took place in Charlottesville,
04 Virginia, in August 2017; agreed?
05 A. That seems to have been public
06 knowledge at a point. As far as my only -- I
07 only know of my personal involvement, which
08 didn't extend to -- to that necessarily.

5. PAGE 49:16 TO 49:17 (RUNNING 00:00:03.749)

16 Q. I'd like to show you a document
17 that's been marked as Exhibit 2.

6. PAGE 50:10 TO 50:25 (RUNNING 00:00:36.220)

10 Q. So this is a series of posts from a
11 Discord server called Vanguard South District;
12 agreed?
13 A. That's what the text says at the --
14 the top left there. Okay.
15 Q. And you understand that there's --
16 that's what this is?
17 A. That's -- that's what it appears to

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18 be.
19 Q. Okay. As you see in the middle of
20 the page, there's a post under the handle
21 Thomas-Commander#770 dated July 24, 2017.
22 Do you see that?
23 A. Okay.
24 Q. Do you see that?
25 A. Yes, I see it.

7. PAGE 51:05 TO 51:10 (RUNNING 00:00:16.065)

05 Q. So you posted on Discord under the
06 handle Thomas-Commander#770; right?
07 A. Yes, yes.
08 Q. So you posted the message on this
09 document under -- under that user name; agreed?
10 A. Yes.

8. PAGE 51:15 TO 51:23 (RUNNING 00:00:19.012)

15 Q. Mr. Rousseau, please read the
16 statement you posted out loud.
17 A. You want me to read the text that's
18 in this document? Okay. So the statement says
19 that, "We think we all agree that there were
20 camps and Jews were put in them, and some of them
21 may have been treated rudely in those camps, but
22 the number was inflated to reach 6 million and
23 gas chambers weren't used." That's what it says.

9. PAGE 57:05 TO 57:14 (RUNNING 00:00:24.930)

05 Q. Is it your testimony that you don't
06 have a belief one way or the other as to whether
07 Jews were killed in gas chambers during the
08 Holocaust?
09 A. I don't have appropriate research. I
10 don't have appropriate educational knowledge on
11 the subject. I've not taken courses or done
12 curriculum on these historical events from which
13 I could use to make an academic judgment of the
14 situation.

10. PAGE 58:17 TO 59:02 (RUNNING 00:00:25.568)

17 Q. If you see in the top left-hand
18 corner of Exhibit 2, it says "Vanguard South
19 District."
20 Do you see that?
21 A. Yes, that's what it says, yes.
22 Q. That was one of the servers operated
23 by Vanguard America on Discord; right?
24 A. I -- okay. I -- it looks like one of
25 those, yes. You said there was a Vanguard Texas
00059:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 one, that's the server we're looking at?

11. PAGE 59:23 TO 59:25 (RUNNING 00:00:05.733)

23 Q. I'm showing you -- I'd like to show
24 you a document that's been marked as Exhibit 3.
25 A. 3. Okay.

12. PAGE 60:04 TO 61:13 (RUNNING 00:01:35.430)

04 Yeah. Yeah, so there you go. There's -- there's
05 me -- so there's me using the terms in the
06 context of the conversation, some derogatory
07 terms you could say.

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08 Q. So this is a series of posts on the
09 Vanguard Texas server on Discord; agreed?
10 A. What was that?
11 Q. This document is a series of posts on
12 the Vanguard Texas server on Discord; agreed?
13 A. Yes, that is the Vanguard Texas
14 server on Discord.
15 Q. Okay. In the middle of the page is a
16 post from you under Thomas-Commander#770 dated
17 August 9, 2017; agreed?
18 A. August 9, 2017. Roger that.
19 Q. Could you please read what you
20 posted?
21 A. Because I currently do my best to
22 exclude these vulgarities from my language, would
23 you mind if I read it while excluding or
24 abbreviating some of the words in the statement?
25 Q. I want you to read what you wrote.
00061:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. I -- I really try not the use
03 vulgarity anymore. But I'll read it as best I
04 can. "I don't care how much you hated N's or --
05 or -- and/or Ks, you never served in the German
06 army. You were never a member of the NSDAP, and
07 might not even be ethnically German on top of
08 that. So getting or wearing SS bolt is just
09 stupid. The symbol means more than that."
10 I don't know what symbol I'm talking
11 about there. But -- I don't know the context of
12 the statement, but, yes, I -- I typed out some --
13 some of those vulgar words, yeah.

13. PAGE 65:19 TO 65:25 (RUNNING 00:00:19.273)

19 Do you understand that the SS --
20 A. Yes.
21 Q. -- was branch of the Nazi party?
22 A. Okay. Yes, I understand that.
23 Q. And you understand that the SS
24 enforced the Nazis' racial policies; agreed?
25 A. I -- yes, okay, I agree.

14. PAGE 70:14 TO 70:15 (RUNNING 00:00:03.812)

14 Q. I'd like to show you a document
15 that's been marked as Exhibit 5.

15. PAGE 71:06 TO 71:13 (RUNNING 00:00:20.120)

06 Q. In the third paragraph at the end of
07 your post, you say, "This nation is my home, full
08 stop, and unity is the foundation every -- of
09 every nation. People in our new ethnostate
10 cannot be simply Europeans on leave. They must
11 have an identity unto themselves."
12 Do you see that?
13 A. Yes, that's what it says.

16. PAGE 77:23 TO 77:25 (RUNNING 00:00:05.129)

23 (Exhibit 6 was marked.)
24 Q. I'd like to show you a document
25 that's been marked as Exhibit 6. This is a

17. PAGE 78:02 TO 78:05 (RUNNING 00:00:15.053)

02 series of posts on the Vanguard Texas server on
03 Discord dated January 20, 2017; agreed?
04 A. January 20, 2017, yeah, it looks like

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05 it.

18. PAGE 78:10 TO 78:13 (RUNNING 00:00:07.051)

10 Q. You say, "I want to see jackboots on
11 Commie skulls, blood on the pavement."
12 Do you see that?
13 A. Yes, that is -- that is the text.

19. PAGE 84:16 TO 84:19 (RUNNING 00:00:06.959)

16 Q. I'd like you to turn to -- I'd like
17 to show you a document that's been marked as
18 Exhibit 8.
19 (Exhibit 8 was marked.)

20. PAGE 84:22 TO 84:24 (RUNNING 00:00:09.732)

22 This is a series of messages on
23 Discord dated August 3, 2017; agreed?
24 A. 2017, yeah, there it is. Yes.

21. PAGE 97:07 TO 97:08 (RUNNING 00:00:04.650)

07 Q. Okay. Let's look at the document
08 that's been marked as Exhibit 7.

22. PAGE 97:10 TO 97:22 (RUNNING 00:00:39.406)

10 Q. This is a series of messages on
11 Discord between you and Dillon Hopper on
12 June 19, 2017; right?
13 A. Hold on. Okay. I can see it.
14 Q. That's what this is; correct?
15 A. This is a conversation with Dillon in
16 2017.
17 Q. Between you and Dillon?
18 A. Yes.
19 Q. And Dillon is posting on Discord
20 under the handle White-PowerStroke(Dillon)#6190;
21 correct?
22 A. That seems like him.

23. PAGE 98:07 TO 98:15 (RUNNING 00:00:14.715)

07 Q. Right. He's asking you what's going
08 on with Charlottesville. Do you see that?
09 A. He's -- yeah, he's asking me what's
10 going on.
11 Q. And then you respond, "It's going to
12 be another rally like the last one. Brandon and
13 Aaron are in contact with local planners."
14 Do you agree you wrote that?
15 A. Yes.

24. PAGE 112:23 TO 113:02 (RUNNING 00:00:05.667)

23 (Exhibit 20 was marked.)
24 Q. (BY MR. SIEGEL) Mr. Rousseau, I'm
25 showing you a document that's been marked as
00113:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 Exhibit 20.

25. PAGE 113:06 TO 113:23 (RUNNING 00:00:51.234)

06 This is a series of posts on the
07 Vanguard South District's server on Discord dated
08 June 26, 2017; correct?
09 A. I can't read the dates.
10 Q. Can we zoom in a little bit?
11 A. Yes, that looks about right.

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12 Q. In the middle of the page, you post a
13 message about you're renting a 15-seat van to go
14 to Charlottesville on August 12th for the Unite
15 the Right event.

16 Do you see that message?

17 A. Okay.

18 Q. Do you agree with me that Vanguard
19 was helping organize transportation for its
20 members to get to the rally in Charlottesville;
21 right?

22 A. Yes, they were attracting people to
23 go.

26. PAGE 122:22 TO 123:04 (RUNNING 00:00:17.839)

22 Q. So this isn't Thomas Rousseau making
23 these plans, it was Vanguard -- this is you
24 telling other Vanguard members on behalf of
25 Vanguard, not behalf of you personally; right?

00123:01 THOMAS RYAN ROUSSEAU - 7/22/2020

02 A. That's -- that's what it looks like.
03 Or at the very least, I'm promoting the plans
04 that were made.

27. PAGE 129:03 TO 129:05 (RUNNING 00:00:03.926)

03 (Exhibit 9 was marked.)

04 Q. I'd like to show you a document
05 that's been marked as Exhibit 9.

28. PAGE 129:06 TO 129:08 (RUNNING 00:00:07.428)

06 This is a series of messages on
07 Discord between you and Matthew Heimbach; agreed?

08 A. Yes.

29. PAGE 132:16 TO 132:20 (RUNNING 00:00:08.726)

16 Q. And then you tell Mr. Heimbach, "you
17 can contact me about anything as far as now
18 goes."

19 Do you see that?

20 A. Yes, that's what I see.

30. PAGE 134:02 TO 134:21 (RUNNING 00:00:40.283)

02 Q. Why were you talking to Mr. Heimbach
03 in June of 2017?

04 A. Why? It seems like he messaged me,
05 he said, "hey." So he reached out to me, it
06 looks like. That's the first message in this
07 list.

08 Q. And why were you talking to him?

09 A. Because -- because he reached out to
10 me and he had a question for me.

11 Q. Okay. And he says he wants to have a
12 phone conference with you.

13 A. Okay.

14 Q. Okay.

15 A. That's -- he says "phone conference,"
16 yeah.

17 Q. And he says, "For Charlottesville, I
18 want to have other Nationalist Front groups on
19 the same page."

20 Do you see where he says that?

21 A. Yes.

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31. PAGE 137:24 TO 137:25 (RUNNING 00:00:04.313)

24 Q. I'd like to show you a document
25 that's been marked as Exhibit 28. This is a

32. PAGE 138:02 TO 138:04 (RUNNING 00:00:12.466)

02 series of posts on Charlottesville 2.0 server on
03 Discord starting on August 4, 2017; agreed?
04 A. Yes.

33. PAGE 138:16 TO 138:22 (RUNNING 00:00:15.174)

16 Q. You see that person posts a message
17 that says, "I need a single point of contact for
18 every organization, meaning everyone with a
19 distinct color role to be assigned by appropriate
20 leadership."
21 Do you see that?
22 A. I see that.

34. PAGE 144:04 TO 144:06 (RUNNING 00:00:06.394)

04 The top message on this page is a
05 post by you; correct?
06 A. Yes.

35. PAGE 144:09 TO 144:15 (RUNNING 00:00:14.178)

09 This message is from -- from you
10 dated August 4, 2017; right?
11 A. Yes.
12 Q. And your message says,
13 "RCO Nick-TX#8823 can represent VanAm."
14 Do you see that?
15 A. Okay.

36. PAGE 145:12 TO 145:18 (RUNNING 00:00:12.016)

12 Q. And when you say "VanAm," that means
13 Vanguard America; right?
14 A. I would assume so.
15 Q. But you wrote that, so that's what
16 that means; right?
17 A. That's what I -- what it looks like
18 it means, yeah.

37. PAGE 149:12 TO 149:24 (RUNNING 00:00:35.431)

12 Q. Vanguard America made promotional
13 materials for the Charlottesville rally; right?
14 A. As far as I know.
15 Q. It was like images and advertising
16 posters, things like that?
17 A. For -- for Twitter, yes.
18 Q. You were involved with that; correct?
19 A. I ran some Twitter accounts.
20 Q. You were involved in creating some of
21 the promotional materials; right?
22 A. And I made some designs, yes.
23 Q. I'd like to show you a document
24 that's been marked as Exhibit 11.

38. PAGE 150:02 TO 150:08 (RUNNING 00:00:20.904)

02 Q. This is a series of messages between
03 you and the user Azzmador#6970 on Discord dated
04 August 6, 2017; agreed?
05 A. Okay.
06 Q. Is that what this is?

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07 A. I can't see the whole thing. I only
08 see the top. But that's what this looks like.

39. PAGE 151:10 TO 151:14 (RUNNING 00:00:11.869)

10 Q. And this post says, "Unite the Right,
11 Join Azzmador and the Daily Stormer to end Jewish
12 influence in America."
13 Do you see that?
14 A. That's what it says, yes.

40. PAGE 157:12 TO 157:22 (RUNNING 00:00:18.794)

12 Q. You sent Mr. Azzmador the image on
13 the first page of Exhibit 11; right?
14 A. Correct, I sent him an image.
15 Q. And he responded to that message
16 saying, "Great." Right?
17 A. Okay.
18 Q. And you responded, "I hope it gains
19 traction."
20 A. Okay.
21 Q. Correct?
22 A. Yes.

41. PAGE 160:22 TO 161:05 (RUNNING 00:00:23.613)

22 Q. Thank you. When you asked, "Was I
23 going to be added to the main DSBK server with
24 leaders and such?" what did you mean by that?
25 A. I was talking about a server. I'm
00161:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 not sure what DSBK means.
03 Q. Is that Daily Stormer Book Club?
04 Does that ring a bell?
05 A. But it's got a K. Wouldn't it be BC?

42. PAGE 161:25 TO 162:10 (RUNNING 00:00:27.802)

25 Q. If you'll look at the third-to-last
00162:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 message.
03 A. Okay.
04 Q. Azzmador says to you, "I just
05 messaged him to do that. He and some of the guys
06 you met yesterday are making shields today so I
07 don't know when we'll get to it. By tonight I'm
08 sure."
09 Do you see that?
10 A. Okay.

43. PAGE 163:24 TO 164:04 (RUNNING 00:00:07.390)

24 Q. You understand that people made
25 shields for the Charlottesville rally; right?
00164:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. I understand that people had shields
03 and they -- and they brought them to the rally,
04 yes.

44. PAGE 164:08 TO 164:09 (RUNNING 00:00:04.018)

08 Q. I'd like to show you a document
09 that's been marked as Exhibit 12.

45. PAGE 164:11 TO 164:17 (RUNNING 00:00:17.277)

11 Q. This is a series of chats on the
12 Vanguard South District server on Discord dated
13 August 6, 2017, between you and -- and other

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14 people; agreed?
15 A. Okay.
16 Q. Is that what this is?
17 A. That's what it looks like.

46. PAGE 165:09 TO 165:17 (RUNNING 00:00:17.320)

09 Q. In the next message you say, "If
10 you're a member of this organization and are
11 attending the Charlottesville rally, this is your
12 dress code for the day."
13 Do you see that?
14 A. That's what it says.
15 Q. And when you say "this organization,"
16 you're referring to Vanguard America; right?
17 A. I would assume so.

47. PAGE 167:09 TO 167:19 (RUNNING 00:00:23.040)

09 Q. Okay. So your posting that to say
10 here's the dress code for Vanguard America at the
11 Charlottesville rally; right?
12 A. For this organization and are
13 attending the rally, this is your dress code for
14 the day. That's what it says.
15 Q. So you're posting this in order to
16 tell Vanguard America members what is the dress
17 code representing Vanguard America at the
18 Charlottesville rally; agreed?
19 A. I assume so.

48. PAGE 167:22 TO 167:24 (RUNNING 00:00:09.094)

22 Q. And the dress code was a white polo
23 and khaki pants; right?
24 A. Okay. That's what people wore, yes.

49. PAGE 170:08 TO 170:13 (RUNNING 00:00:10.382)

08 Q. You wore a white polo to the
09 Charlottesville rally; right?
10 A. That is what I wore, yes.
11 Q. You wore khaki pants to the
12 Charlottesville rally; right?
13 A. I believe my pants were tan.

50. PAGE 176:06 TO 176:17 (RUNNING 00:00:26.084)

06 Q. How many Vanguard America members
07 were at the rally?
08 A. I don't remember.
09 Q. Approximately?
10 A. A few dozen.
11 Q. A few dozen. And some of them wore
12 white polo shirts; agreed?
13 A. At least some, yes.
14 Q. Did all the Vanguard members who were
15 wearing white polo shirts have the Vanguard
16 America logo on their white polo shirts?
17 A. I don't know.

51. PAGE 176:18 TO 176:19 (RUNNING 00:00:04.371)

18 Q. I'd like to show you a document
19 that's been marked as Exhibit 14.

52. PAGE 176:21 TO 178:04 (RUNNING 00:01:12.699)

21 Q. This is a series of posts on the
22 Cville Vanguard server on Discord dated

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23 August 11, 2017; correct?
24 A. Okay.
25 Q. Is that what this is?
00177:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. It's what it looks like.
03 Q. In the middle of the page, somebody
04 posts a message to you about what color
05 undershirt to wear.
06 Do you see that?
07 A. Undershirt. Okay.
08 Q. And you respond, "As long as the polo
09 is white, it doesn't matter."
10 Do you see that?
11 A. That's what the message says.
12 Q. So does this refresh your -- your
13 recollection that the dress code of Vanguard
14 America was a white polo shirt?
15 A. Sorry, what was that?
16 Q. Does this refresh your recollection
17 that at the Charlottesville rally, the dress code
18 for Vanguard America was a white polo shirt?
19 A. That's what it looks like. Again,
20 this -- all I'm saying is -- is that I'm talking
21 about an undershirt with -- with this other guy
22 and --
23 Q. And you say, "As long as the polo is
24 white, it doesn't matter." So it was a white
25 polo; right?
00178:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. Sure. And if this is in the context
03 of the rally or this is in the context of the
04 dress code, then that's what this means.

53. PAGE 178:22 TO 178:24 (RUNNING 00:00:04.282)

22 Q. I'd like to show you a document
23 that's been marked as Exhibit 13.
24 (Exhibit 13 was marked.)

54. PAGE 179:16 TO 179:23 (RUNNING 00:00:15.900)

16 Q. In the middle of the page, you post a
17 message to everyone. It says, "Remember to be
18 clean cut, your clothes are going to fit well,
19 they are going to be clean and worn properly, you
20 are going to be well-groomed and well-mannered,
21 and if you're up for it, well disciplined."
22 Do you see that?
23 A. Yes.

55. PAGE 182:05 TO 182:08 (RUNNING 00:00:07.165)

05 Q. You're telling members how to dress,
06 to be clean cut and well groomed; right?
07 A. I am posting a message that says
08 these things.

56. PAGE 183:09 TO 183:14 (RUNNING 00:00:09.436)

09 Q. Thank you. At the last sentence of
10 your post, in the middle it says, "Fascism is
11 fucking beautiful more than anything else, make
12 people know that."
13 Do you see that?
14 A. Yes.

57. PAGE 188:11 TO 188:13 (RUNNING 00:00:07.399)

11 Q. Vanguard America promoted fascism;

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12 true?
13 A. Okay. Sure.

58. PAGE 191:16 TO 191:18 (RUNNING 00:00:06.273)

16 Q. (BY MR. SIEGEL) Mr. Rousseau, I'd
17 like to show you a document that's been marked
18 Exhibit 18.

59. PAGE 191:20 TO 191:22 (RUNNING 00:00:08.879)

20 Q. This is a series of posts on the
21 Cville Vanguard server on Discord dated
22 August 9, 2017; agreed?

60. PAGE 191:25 TO 191:25 (RUNNING 00:00:02.304)

25 There we go. Okay. Yes.

61. PAGE 192:06 TO 192:21 (RUNNING 00:00:49.882)

06 Q. This is a photograph of shields --
07 the Daily Stormer?
08 A. Are they for them? Maybe.
09 Q. Are these Vanguard America shields?
10 A. No, I don't think so.
11 Q. How did you get this photograph?
12 A. Someone probably sent it to me. I
13 don't think I took it.
14 Q. If you'll look on the next post, it's
15 a statement by you. It says, "DS guy's shields."
16 Do you see that?
17 A. Okay. Yes.
18 Q. Do you understand that refers to
19 Daily Stormer guys?
20 A. Yeah, that's most likely what it
21 means in this file.

62. PAGE 193:06 TO 193:17 (RUNNING 00:00:36.084)

06 Q. You knew people were bringing shields
07 to the Charlottesville rally; right?
08 A. That seems like something I was aware
09 of at the time.
10 Q. And Vanguard America made shields for
11 the Charlottesville rally; right?
12 A. Some of them.
13 Q. The Charlottesville Vanguard server
14 was one of the servers Vanguard used to
15 coordinate for purposes of the Charlottesville
16 rally; right?
17 A. As far as I know, yes.

63. PAGE 193:18 TO 193:20 (RUNNING 00:00:04.600)

18 Q. I'd like to show you a document
19 that's been marked as Exhibit 61.
20 (Exhibit 61 was marked.)

64. PAGE 193:23 TO 194:04 (RUNNING 00:00:14.885)

23 Q. This is a series of posts in the
24 Cville Vanguard server on Discord dated August 9,
25 2017; correct?
00194:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. All right.
03 Q. Is that what this is?
04 A. It's what it looks like.

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65. PAGE 194:08 TO 194:13 (RUNNING 00:00:13.002)

08 Q. On this first post from you is an
09 image. It says, "Crack open a red one with the
10 boys," and has an image of a club hitting a
11 communist.
12 Do you see that?
13 A. Okay. Yeah.

66. PAGE 196:05 TO 196:17 (RUNNING 00:00:32.094)

05 Q. Let's just take this step by step.
06 So you were a member of Vanguard
07 America on August 9, 2017; right?
08 A. Yes.
09 Q. You held -- you held a leadership
10 role on that date; right?
11 A. As a spokesperson.
12 Q. And you posted this in the
13 Charlottesville Vanguard server; right?
14 A. Yes, it is posted in the server.
15 Q. And other members could view messages
16 on the Charlottesville Vanguard server; right?
17 A. If other people saw this image, yes.

67. PAGE 198:12 TO 198:15 (RUNNING 00:00:08.756)

12 Q. And you -- you understand this was
13 two days before the Charlottesville rally on
14 Saturday, August 12th; right?
15 A. Okay.

68. PAGE 201:10 TO 201:11 (RUNNING 00:00:05.768)

10 Q. I'd like to show you a document that
11 has been marked as Exhibit 30.

69. PAGE 201:21 TO 203:12 (RUNNING 00:01:31.481)

21 Q. So Exhibit 30 is a series of posts on
22 the Vanguard Texas server on Discord dated
23 August 10, 2017; correct?
24 A. Okay. Yes, photo of Alex.
25 Q. And towards the middle of the page,
00202:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 you post, "Boys, it's travel day, the bravest
03 sons of the nation are headed across this land to
04 an uncertain fate."
05 Do you see that?
06 A. That's -- that's what it says.
07 Q. You're referring to Vanguard America
08 members traveling to Charlottesville; right?
09 A. I'm referring to the bravest sons of
10 the nation. How broad that term is, whether
11 that's relating to people in other organizations
12 or random people traveling, I'm not sure. I'm
13 not sure exact --
14 Q. You're referring to people traveling
15 to Charlottesville; is that fair?
16 A. Sure. Yes, we can go with that.
17 Q. Okay. And the people who are -- you
18 thought the people that were traveling to
19 Charlottesville were the bravest sons of the
20 nation?
21 A. Again, this is a -- this is very
22 poetic passage obviously posted alongside of a
23 jokes. You see right above it, there's --
24 there's someone talking about spicy meatballs.
25 So, again, this is, you know, a bit -- a bit of a

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00203:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 gest in terms of a --
03 Q. What's the joke?
04 A. The joke is that I'm using overly
05 dramatic language to describe something which is
06 much more mundane than it seems. That's the
07 joke.
08 Q. Well, when you say "bravest sons of a
09 nation," you're referring to Vanguard members and
10 other individuals and groups that were traveling
11 to Charlottesville --
12 A. Yes.

70. PAGE 207:18 TO 207:19 (RUNNING 00:00:03.978)

18 Q. I'd like to show you a document
19 that's been marked as Exhibit 27.

71. PAGE 207:21 TO 208:08 (RUNNING 00:00:31.751)

21 Q. This is a series of the chats on the
22 Cville Vanguard server on Discord dated
23 July 27, 2017; agreed?
24 A. Yes.
25 Q. In the middle you post a message. It
00208:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 says, "I think it's already been said, but VanAm
03 alongside other groups in the NF, is not bringing
04 any women to the event. There's an entire future
05 of less public, more family friendly events which
06 would be more suitable."
07 Do you see that?
08 A. Okay.

72. PAGE 211:19 TO 211:24 (RUNNING 00:00:15.177)

19 Q. When you wrote, "VanAm alongside
20 other groups in the NF," you are conveying that
21 Vanguard America was among the groups in the
22 Nationalist Front; correct?
23 A. Yes, whatever value or consequence
24 that held, however small.

73. PAGE 213:07 TO 213:12 (RUNNING 00:00:15.501)

07 Q. You say Vanguard America and other
08 groups are not bringing women because there are
09 less public, more family friendly events that
10 would be more suitable other than
11 Charlottesville; right?
12 A. Yes, in that context.

74. PAGE 229:08 TO 229:12 (RUNNING 00:00:07.465)

08 Q. And you were present in
09 Charlottesville for that; correct?
10 A. The torch -- the torch thing?
11 Q. Yes.
12 A. Yes.

75. PAGE 233:19 TO 233:22 (RUNNING 00:00:05.469)

19 Q. I'd like to show you a document
20 that's been marked as Exhibit 29.
21 (Exhibit 29 was marked.)
22 A. Let's see it.

76. PAGE 233:23 TO 234:02 (RUNNING 00:00:08.947)

23 Q. This is a series of posts on the

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24 Charlottesville Vanguard server on Discord dated
25 August 11, 2017; correct?
00234:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. Okay.

77. PAGE 234:08 TO 234:10 (RUNNING 00:00:06.670)

08 Q. In the middle of the page is a post
09 by you; correct?
10 A. Yes. I'm reading it right now.

78. PAGE 234:11 TO 234:19 (RUNNING 00:00:19.300)

11 Okay. Yeah.
12 Q. When you wrote, "The leadership
13 meeting is compromised," what do you mean -- what
14 did you mean by that?
15 A. I don't know.
16 Q. You wrote, "Leadership is going
17 alongside anyone who wants to provide security."
18 What did you mean by that?
19 A. I don't -- I don't know.

79. PAGE 235:10 TO 235:22 (RUNNING 00:00:26.653)

10 Q. Next you say, "There will be a VA
11 general meeting afterwards before the tiki
12 march."
13 Do you see that?
14 A. Okay. Yeah, that's what it says.
15 Q. Are you referring to a Vanguard
16 America meeting?
17 A. VA, yeah. Well, it could mean
18 Virginia, but it probably means Vanguard America
19 because we were all in Virginia at this time,
20 probably, right. Is it the 8th? Or 11th, right.
21 Okay. Yeah, we can -- we can say that we mean
22 Vanguard America.

80. PAGE 240:04 TO 240:24 (RUNNING 00:00:50.823)

04 Q. How did you get from Texas to
05 Charlottesville?
06 A. Vehicle. Automobile. Car.
07 Q. What kind of car?
08 A. It was a -- it was a van. The -- the
09 passenger -- so the van.
10 Q. Whose car was it?
11 A. It was a rental.
12 Q. Who drove the van?
13 A. I don't remember.
14 Q. How many people were in the van?
15 A. Again, it was a 15 passenger, so
16 probably around that. Maybe it wasn't totally
17 full, you know.
18 Q. So you rode in the van that Vanguard
19 members had arranged to get to Charlottesville?
20 A. I believe so.
21 Q. Can you identify any other person in
22 that van?
23 A. There was a -- was Azzmador, he was
24 in the van. I remember his -- him being there.

81. PAGE 244:18 TO 246:09 (RUNNING 00:01:55.553)

18 Q. Okay. And tell me about the
19 torch-lit march. What did you do? Where did you
20 go? What was it?
21 A. Well, I remember it started at -- it

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22 was at that college, and people got into a big
23 line. There were a lot of people running around
24 yelling at people, telling them what to do. I --
25 I ended up in one of the lines. Maybe there were
00245:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 two big lines or maybe there was one. Everybody
03 started lighting the torches and then people
04 started walking.
05 I don't know who was at the front or
06 like there was a route that had been planned. I
07 wasn't privy to it, if there was. Everybody was
08 just -- to me, it seemed like everybody was just
09 walking.
10 And then after a while -- after a
11 while, you know, the -- there was like a -- I
12 think there was a tunnel, kind of a -- maybe an
13 archway, and then everybody got together around
14 that statue. And then I was -- I was kind of a
15 little bit away I remember, and then -- and then
16 I don't know exactly what happened, but I saw a
17 lot of people get scuffly.
18 I didn't see any fights or anything
19 like that in a whole lot of detail. I just
20 remember there were lots of people moving around
21 very aggressively, and then I got -- and then I
22 got either, like, tear gas or pepper spray or
23 something in my eyes. And I walked away with my
24 eyes closed trying to get it out, and that's --
25 that's all I saw for the next maybe minute or
00246:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 two.
03 And then once it cleared out, I was
04 just walk -- everybody seemed like they were just
05 walking back to where it all started, I think in
06 a parking lot maybe, maybe a field. And I -- I
07 just started going that way then, and then --
08 then I walked back to the parking lot and I found
09 the van and that was that.

82. PAGE 247:06 TO 247:23 (RUNNING 00:00:37.652)

06 Q. At some point you were in a van that
07 went to a parking lot for the torch-lit march?
08 A. Yes, I was in a van that went to a
09 parking lot for the torch march that's at or by
10 the college.
11 Q. You got out of the van with other
12 Vanguard -- and met with other Vanguard members
13 and other people who were not Vanguard members?
14 A. Yeah, there were lots -- lots of
15 random people there.
16 Q. And many of those people carried a
17 tiki torch; correct?
18 A. Many of them, yes. Not all of them
19 but a lot of them.
20 Q. Did you carry a tiki torch?
21 A. I think I was given one by someone,
22 and I held it for a while until I put it out
23 after -- after a bit.

83. PAGE 248:21 TO 248:25 (RUNNING 00:00:12.731)

21 Q. And then you as a group lighted
22 torches and marched through the campus of the
23 University of Virginia; correct?
24 A. Through the University of Virginia?
25 If -- yes, if that was the college, then, yes.

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84. PAGE 249:03 TO 250:23 (RUNNING 00:01:53.404)

03 The group included Vanguard America
04 members in addition to yourself; right?

05 A. In addition to myself, yes.

06 Q. And the group was chanting as they
07 marched; right?

08 A. Yes, there were a variety of chants
09 that happened around there, yes.

10 Q. What sort of chants were being made?

11 A. I remember some people were chanting
12 "you will not replace us," and some people were
13 chanting "blood and soil," and some people were
14 chanting -- I think there was a chant which was
15 just like hooting and hollering, but that's not
16 really a chant, is it.

17 I remember I think there was a chant,
18 it was like "white lives matter" or maybe that
19 was another thing that I'm remembering. That's
20 what I remember. I think there might have been
21 more.

22 Q. Do you remember a chant "Jews will
23 not replace us"?

24 A. I think that some people might have
25 been, but I don't know if that the confusion with
00250:01 THOMAS RYAN ROUSSEAU - 7/22/2020

02 some people thinking that it was a misspeak of
03 you or Jews. I don't know if maybe even people
04 were attending at the same time thinking
05 different people thought it was different things.
06 I -- I remember hearing you until -- until it was
07 like -- until other people started saying it was
08 something else later on.

09 But I just remembered that being the
10 slogan. I don't know exactly who started the
11 chant. Again, it was just -- it was just a crowd
12 and I was just -- I was just in it. I remember
13 it -- that night I remember it seeming like it
14 was "you," which I remember being said, but I --
15 again, I, you know -- I was just kind of in the
16 crowd.

17 Q. Did any Vanguard members chant "you
18 will not replace us"?

19 A. You will not -- probably. Everybody
20 seemed like they were chanting something at one
21 point or another. I don't -- I don't exactly
22 remember who was chanting what or if some people
23 bowed out of some chants.

85. PAGE 281:25 TO 282:02 (RUNNING 00:00:04.404)

25 Q. I'd like to show you a document
00282:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 that's been marked Exhibit 26.

86. PAGE 282:04 TO 282:07 (RUNNING 00:00:09.020)

04 Q. This is a series of chats on the
05 Charlottesville Vanguard server on Discord dated
06 August 11, 2017; correct?

07 A. Yes.

87. PAGE 283:05 TO 283:20 (RUNNING 00:00:30.940)

05 Q. Do you see in the middle of the page,
06 you state, "We aren't open carrying. We have
07 people who are concealed carrying. Those are the
08 rules. Attend or don't."

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09 Do you see that?
10 A. That's what it says.
11 Q. When you -- when you use the phrase
12 "open carrying," you're referring to the open
13 carrying of a firearm; correct?
14 A. Presumably. I don't know what else
15 would be open carry by the use that phrase.
16 Q. And when you use that phrase
17 "concealed carrying," you're referring to the
18 concealed carrying of firearms; right?
19 A. Presumably. I don't know what would
20 be used by that phrase.

88. PAGE 291:02 TO 291:04 (RUNNING 00:00:04.404)

02 Q. Okay. Thank you. I'd like to show
03 you a document that's been marked Exhibit 32.
04 (Exhibit 32 was marked.)

89. PAGE 294:08 TO 294:10 (RUNNING 00:00:05.900)

08 Q. I'd like to show you a document that
09 has been marked as Exhibit 33.
10 A. 33. Okay.

90. PAGE 294:12 TO 294:15 (RUNNING 00:00:08.581)

12 Q. We're looking at a series of chats on
13 the Charlottesville Vanguard server on Discord
14 dated August 11, 2017; correct?
15 A. Yes.

91. PAGE 294:21 TO 295:02 (RUNNING 00:00:13.257)

21 Q. In the middle of the page, you post a
22 message that says, "We have VA security already
23 set for the meeting. We'll say the torch time
24 and location as it is finalized."
25 Do you see that?
00295:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. Yes, that's what it says.

92. PAGE 295:20 TO 296:02 (RUNNING 00:00:22.692)

20 Q. Okay. Is it fair to say that this
21 document is Vanguard just giving an update to its
22 members about the status of the rally?
23 A. Well, it's me -- it's me saying
24 something. I don't know exactly where I got this
25 information or -- or where this is coming from,
00296:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 but this is just me saying something, I guess.

93. PAGE 298:19 TO 298:22 (RUNNING 00:00:05.628)

19 Q. (BY MR. SIEGEL) Mr. Rousseau, I'd
20 like to show you a document that's been marked
21 Exhibit 77.
22 (Exhibit 77 was marked.)

94. PAGE 299:07 TO 299:14 (RUNNING 00:00:16.900)

07 Q. And that's a fair and accurate
08 depiction of what happened that evening?
09 A. Fair and accurate, well, it's a --
10 it's a photograph, that's -- that's what the
11 scene looked like at that moment. It looks like
12 a filter's been applied to it. I'm not sure if
13 any other edits have been. But, yeah, it looks
14 like it.

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95. PAGE 304:20 TO 304:21 (RUNNING 00:00:03.968)

20 Q. I'd like to show you a document
21 that's been marked as Exhibit 37.

96. PAGE 304:24 TO 305:12 (RUNNING 00:00:35.009)

24 Q. This is a series of posts on Discord
25 dated August 12, 2017; correct?
00305:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. Yes.
03 Q. And you post an image on August 12th
04 in the middle of the page, and that's a image
05 from the Friday night torch march; correct?
06 A. That's what it looks like, yes.
07 Q. If we scroll down a little bit to the
08 next message. You say, "March was a huge success
09 guys, hope to see things get even better
10 tomorrow."
11 Do you see that?
12 A. Yes.

97. PAGE 307:21 TO 307:22 (RUNNING 00:00:04.760)

21 Q. I'd like to show you a document
22 that's been marked as Exhibit 41.

98. PAGE 307:24 TO 309:15 (RUNNING 00:01:32.536)

24 Q. This is a series of chats on the
25 Charlottesville Vanguard server on Discord
00308:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 between you and another Vanguard member dated
03 August 12, 2017; correct?
04 A. Yes.
05 Q. And in the message, you say, "Today
06 is the big day. Headed to McIntire park.
07 Carpool as much as possible. Spaces are limited.
08 Bring any gear you plan to have at the rally."
09 Do you see that?
10 A. Yes.
11 Q. And particular message is geared
12 towards everyone, right, that's why you say
13 "everyone" at the beginning?
14 A. Most likely, yeah.
15 Q. Everyone in the server; right?
16 A. They guys there though, I'm not sure
17 what that is. Go ahead.
18 Q. You're referring to everyone in
19 the -- on the Charlottesville Vanguard server;
20 right?
21 A. Yeah, whoever could have seen this.
22 Q. And so, again, is it fair to say you
23 were just kind of giving an update to everybody
24 else about the goings-on, where to go, what to
25 do?
00309:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. Yes, because -- so that's McIntire,
03 so -- so just bring anything you want to have. I
04 think -- I think I would have, you know -- I
05 think I would have been on the McIntire thing
06 because I don't really know anything. So I guess
07 that's the park with the baseball fields, right,
08 that I mentioned earlier, forgot what it was
09 called.
10 So that was probably more of what
11 happened with Kessler, Fulcrum, or Kline, you
12 know, you know, they would have probably said a

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13 little bit before this of like, hey, here's --
14 here's everybody where we're all meeting up and I
15 was just trying to pass that along, I guess.

99. PAGE 311:21 TO 311:22 (RUNNING 00:00:05.012)

21 Q. Understood. I'd like to show you a
22 document that's been marked as Exhibit 4.

100. PAGE 311:24 TO 312:14 (RUNNING 00:00:27.970)

24 Q. This is a series of chats on the
25 Vanguard Texas server on Discord dated
00312:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 August 13, 2017, the day after the -- the rally;
03 correct?
04 A. Yep.
05 Q. In the middle of this document, you
06 post a message that says, "They caught me in the
07 middle of screaming either 'blood' or 'soil'."
08 Do you see that?
09 A. Yes.
10 Q. Are you referring to a photograph
11 that was taking of you, if you remember?
12 A. Yes, I believe I'm referring to a
13 very unflattering photograph that I'm sure you've
14 seen.

101. PAGE 313:07 TO 313:10 (RUNNING 00:00:05.323)

07 Q. Okay. I'd like to show you a
08 document that's been marked as Exhibit 39.
09 (Exhibit 39 was marked.)
10 A. Okay.

102. PAGE 313:11 TO 313:23 (RUNNING 00:00:31.374)

11 Q. This is a series of chats on the
12 Vanguard Midwest District server on Discord dated
13 August 13, 2017, the day after the rally; right?
14 A. Day after the rally, the 12th -- or
15 the 13th. Okay.
16 Q. Is that correct? The 13th?
17 A. That's what it looks like, yes.
18 Q. And Vanguard Midwest District is
19 another one of the Vanguard America servers on
20 Discord?
21 A. I suppose so, yeah. Didn't know
22 about this one. Well, I didn't before now, I
23 guess. I had -- I had forgotten about it.

103. PAGE 314:25 TO 315:06 (RUNNING 00:00:09.882)

25 Q. Well, at the time you would at least
00315:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 agree with me, that you wrote that you were
03 leading our men at Charlottesville all day;
04 right?
05 A. Yes, whoever "our men" is in this
06 context, yeah.

104. PAGE 316:22 TO 316:23 (RUNNING 00:00:04.890)

22 Q. I'd like to show you a document
23 that's been marked as Exhibit 64.

105. PAGE 316:25 TO 317:08 (RUNNING 00:00:15.530)

25 Q. Image -- this is a image Vanguard
00317:01 THOMAS RYAN ROUSSEAU - 7/22/2020

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02 America members marching in Charlottesville on
03 August 12th; correct?
04 A. Okay.
05 Q. Mr. Rousseau?
06 A. Yes. Yes, hello.
07 Q. Is that correct?
08 A. That's what it looks like, yes.

106. PAGE 318:03 TO 318:05 (RUNNING 00:00:03.513)

03 Q. I'd like to show you a document
04 that's been marked as Exhibit 66.
05 (Exhibit 66 was marked.)

107. PAGE 319:11 TO 319:17 (RUNNING 00:00:13.600)

11 Q. Now, on the white polo shirt, he's
12 got a Vanguard America emblem on his shirt;
13 correct?
14 A. Yes, I see that.
15 Q. Is he a Vanguard America member?
16 A. Oh. Potentially, yes, he has a
17 shirt.

108. PAGE 321:21 TO 321:22 (RUNNING 00:00:04.445)

21 Q. I'd like to show you a document
22 that's been marked as Exhibit 68.

109. PAGE 321:24 TO 322:06 (RUNNING 00:00:12.683)

24 Q. Is this a fair and accurate depiction
25 of the Friday night march?
00322:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 A. Yeah, looks like a real photo. I
03 can't tell if it's doctored in any way.
04 Q. You have no reason to think it's
05 doctored; right?
06 A. No, I don't know.

110. PAGE 323:09 TO 323:10 (RUNNING 00:00:04.440)

09 Q. I'd like to show you a document
10 that's been marked as Exhibit 67.

111. PAGE 323:12 TO 324:03 (RUNNING 00:00:40.174)

12 Q. Do you recognize this photograph?
13 A. I recognize it? I'm not sure if I've
14 seen it before, but I -- I know it seems like a
15 photograph from the Saturday.
16 Q. And do you recognize any individuals
17 in this photograph?
18 A. I recognize that James Fields is
19 there in the center.
20 Q. See anybody else?
21 A. No.
22 Q. It looks like at least two and
23 potentially three individuals, including
24 Mr. Fields, are carrying a shield with a emblem
25 on it.
00324:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 Do you see that?
03 A. Yes.

112. PAGE 325:25 TO 326:03 (RUNNING 00:00:05.219)

25 Q. (BY MR. SIEGEL) Mr. Rousseau, I'd
00326:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 like to show you a document that's been marked as

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03 Exhibit 90.

113. PAGE 326:05 TO 326:18 (RUNNING 00:00:37.763)

05 Q. This is a page from the Vanguard
06 America website "Blood and Soil." Correct?
07 A. It's a page from a website? I can't
08 tell if it's from a website.
09 Q. Let's scroll down so you can see the
10 whole document.
11 A. A page -- it looks like it's been --
12 well, I guess it's been copied and pasted on to a
13 -- to a document. Yeah, sure, it came from the
14 website.
15 Q. And the photo in this website is a
16 bunch of Vanguard America members carrying
17 shields with a logo of two axes crossed; right?
18 A. Yes.

114. PAGE 327:17 TO 328:07 (RUNNING 00:00:33.243)

17 Q. The question I'm asking you is if
18 you'll look at Exhibit 90, it's got a photo of
19 Vanguard America members holding shields;
20 correct?
21 A. Yes, there are photos of people
22 holding what appear to be shields there.
23 Q. And those shields have an icon on it;
24 correct?
25 A. They have a little -- little insignia
00328:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 logo thing, yes.
03 Q. And that insignia is used by Vanguard
04 America; right?
05 A. It -- it was held by members of the
06 organization at that -- at the point that that
07 photo was taken, whenever that was.

115. PAGE 332:05 TO 332:05 (RUNNING 00:00:04.818)

05 Q. Let's go back to Exhibit 67. The

116. PAGE 332:06 TO 333:21 (RUNNING 00:01:25.494)

06 icon on the two shields in this photograph is the
07 same icon that appears on the shields in the
08 image posted to Vanguard America's website;
09 correct?
10 A. Okay.
11 Q. Is that correct?
12 A. It looks similar.
13 Q. Are you saying it's not the same?
14 A. It -- it could -- it could be
15 different. It's -- based on these photos, it
16 looks similar.
17 Q. Do you -- do you need us to go back
18 to Exhibit 90?
19 A. It -- it looks like a similar logo,
20 yes.
21 Q. Is it the same logo?
22 A. The ones on the other one look a
23 little bit different, but we can say it's the
24 same.
25 Q. No, I don't want to -- I want you to
00333:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 tell me, is it the same or is it not the same?
03 A. These look a little bit different.
04 They look a little bit stretched. They look like

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05 they're oval shaped. The other ones look like
06 they were circled.
07 Q. Other than the fact that these are
08 slightly oval and the other ones are more perfect
09 circles, in your opinion, is there any
10 difference?
11 A. Well, I, you know, that is a
12 difference, and you asked me if they were the
13 same ones and I wanted to cite a difference to
14 you. So there we go. So outside -- outside of
15 that, I would say, yes, it looks very similar, in
16 terms of anything that I can -- I can use
17 visually with what I can see right now.
18 Q. So other than a slightly different
19 shape, this is the same icon that's on Vanguard
20 America's website in Exhibit 90; agreed?
21 A. Sure.

117. PAGE 333:25 TO 334:02 (RUNNING 00:00:04.174)

25 Q. I'd like to show you a document
00334:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 that's been marked as Exhibit 69.

118. PAGE 334:04 TO 334:13 (RUNNING 00:00:19.936)

04 Q. This is an image of you and other
05 people in Charlottesville on August 12th of 2017;
06 correct?
07 A. Okay.
08 Q. I'm asking you, is that correct?
09 A. That looks like me, yeah.
10 Q. Is this an accurate representation of
11 you and the group that day?
12 A. Accurate -- it's a photo. If it's a
13 real photo, then it -- we can say it's accurate.

119. PAGE 337:13 TO 337:15 (RUNNING 00:00:06.809)

13 This photo was taken during the Unite
14 to Right rally on August 12, 2017?
15 A. Looks like it.

120. PAGE 337:16 TO 337:17 (RUNNING 00:00:04.069)

16 Q. I'd like to show you a document
17 that's been marked as Exhibit 70.

121. PAGE 337:19 TO 337:21 (RUNNING 00:00:08.932)

19 Q. This is a photograph of you looking
20 at others on August 12, 2017; correct?
21 A. Yes. Same statue, too.

122. PAGE 337:25 TO 338:04 (RUNNING 00:00:06.350)

25 Q. Are you the individual on the left of
00338:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 this photograph in the foreground?
03 A. Center left, yeah, there with the
04 hat.

123. PAGE 338:17 TO 338:20 (RUNNING 00:00:09.954)

17 Q. If you keep moving right on the
18 photograph, the person on the far right, it looks
19 like James Fields; correct?
20 A. I recognize him.

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124. PAGE 340:16 TO 340:17 (RUNNING 00:00:03.882)

16 Q. I'd like to show you a document
17 that's been marked as Exhibit 84.

125. PAGE 340:19 TO 340:22 (RUNNING 00:00:06.983)

19 Q. Do you recognize any of the
20 individuals in this photograph?
21 A. I recognize Fields there. It looks
22 like he's in the center left.

126. PAGE 341:13 TO 341:17 (RUNNING 00:00:09.297)

13 Q. Do you think this is a fair and
14 accurate representation of Unite the Right rally
15 on August 12, 2017?
16 A. Looks like a real photo that was
17 taken that day.

127. PAGE 342:13 TO 342:14 (RUNNING 00:00:03.856)

13 Q. I'd like to show you a document
14 that's been marked Exhibit 86.

128. PAGE 342:16 TO 342:23 (RUNNING 00:00:15.944)

16 Q. Is this a fair and accurate depiction
17 of the Unite the Right rally on August 12, 2017?
18 A. Yes.
19 Q. Do you recognize any individuals in
20 this photograph?
21 A. I recognize Fields again. He's there
22 center left just to the right of that what looks
23 like a flag or a banner.

129. PAGE 343:02 TO 343:15 (RUNNING 00:00:30.905)

02 Q. The two flags in the foreground of
03 this photograph are Vanguard America flags?
04 A. There's one in front of the line of
05 people there. There's another one which looks
06 like it's being held by someone, and there's a
07 third in the back. So there's three -- I don't
08 know about the other ones in the further back and
09 that look black, but they could be anything.
10 Q. Okay. So there's three Vanguard
11 America flags in the foreground?
12 A. Well, there's one in the foreground,
13 one in the middle ground, and one in the
14 background, but I guess we're talking about the
15 same thing, so, yeah.

130. PAGE 344:22 TO 344:23 (RUNNING 00:00:03.843)

22 Q. I'd like to show you a document
23 that's been marked as Exhibit 88.

131. PAGE 344:25 TO 345:10 (RUNNING 00:00:23.941)

25 Q. Does this depict a fair and accurate
00345:01 THOMAS RYAN ROUSSEAU - 7/22/2020
02 representation of the Unite the Right rally on
03 August 12, 2017?
04 A. Yes.
05 Q. Do you recognize any individuals in
06 this photograph?
07 A. I recognize Eli there in the center
08 with his hand on the -- on the railing there, and
09 I see a -- very small in the background, there's

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10 Fields again, just over his right shoulder.

132. PAGE 345:16 TO 345:22 (RUNNING 00:00:17.290)

16 Q. Can you identify any Vanguard America
17 flags in this photograph?

18 A. I can see two flags to the left.

19 Q. Are you talking about one directly
20 behind Mr. Mosley and one behind the --

21 A. Yes. I can't tell who's holding
22 them, but I can see them.

133. PAGE 345:23 TO 346:03 (RUNNING 00:00:07.159)

23 Q. Mr. Rousseau, I'd like to show you a
24 document that's been marked Exhibit 79. It's a
25 video.

00346:01 THOMAS RYAN ROUSSEAU - 7/22/2020

02 (Exhibit 79 was marked.)

03 A. A video. Okay.

134. PAGE 346:07 TO 346:07 (RUNNING 00:00:15.177)

07 (Video played for Mr. Rousseau.)

135. PAGE 346:11 TO 346:15 (RUNNING 00:00:07.454)

11 Q. Is that a fair and accurate
12 representation of Unite the Right rally in
13 Charlottesville on August 12th?

14 A. Looks like a real video that was
15 taken that day.

136. PAGE 346:16 TO 346:17 (RUNNING 00:00:04.883)

16 Q. I'd like to show you another document
17 that's been marked as Exhibit 80, another video.

137. PAGE 346:20 TO 346:20 (RUNNING 00:01:37.770)

20 (Video played for Mr. Rousseau.)

138. PAGE 346:21 TO 347:02 (RUNNING 00:00:06.288)

21 Q. Mr. Rousseau, is that a fair and
22 accurate representation --

23 A. Yes.

24 Q. -- of the Unite the Right rally on
25 August 12, 2017?

00347:01 THOMAS RYAN ROUSSEAU - 7/22/2020

02 A. Yes.

139. PAGE 347:10 TO 347:19 (RUNNING 00:00:17.711)

10 Q. That was the group that you were
11 marching with that day; right?

12 A. I'm not sure if I noticed myself in
13 that lineup. I could have been among the crowd.
14 I didn't get a good look.

15 Q. Let's watch it again. I think you --
16 I think you'll see you're the third individual in
17 line.

18 A. Okay. I believe you, if that's the
19 case.

140. PAGE 348:12 TO 348:14 (RUNNING 00:00:04.089)

12 Q. I'd like to show you a document
13 that's marked as Exhibit No. 81. It's another
14 video.

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141. PAGE 348:16 TO 348:16 (RUNNING 00:00:18.602)

16 (Video played for Mr. Rousseau.)

142. PAGE 348:17 TO 348:25 (RUNNING 00:00:16.260)

17 Q. Is that a fair and accurate
18 representation of the Unite the Right rally on
19 August 12th?
20 A. Yes.
21 Q. Was that another video taken of the
22 group that you were marching with, as best you
23 can tell?
24 A. It looks like a different angle of
25 the second video we saw there, yes.

143. PAGE 349:02 TO 349:03 (RUNNING 00:00:03.413)

02 Q. I'd like to show you a document
03 that's been marked as Exhibit 82.

144. PAGE 349:05 TO 349:05 (RUNNING 00:00:17.666)

05 (Video played for Mr. Rousseau.)

145. PAGE 349:06 TO 349:12 (RUNNING 00:00:11.417)

06 Q. Is that a fair and accurate
07 representation of the Unite the Right rally on
08 August 12, 2017?
09 A. Yes.
10 Q. And you're about the third or fourth
11 individual in that line of marchers?
12 A. Something like that.

146. PAGE 355:06 TO 355:07 (RUNNING 00:00:03.799)

06 Q. Okay. I'd like to show you a
07 document that's been marked as Exhibit 43.

147. PAGE 355:10 TO 355:24 (RUNNING 00:00:35.888)

10 Q. This is a series of chats on the
11 Vanguard Texas Discord server dated
12 August 12, 2017; correct?
13 A. Yes.
14 Q. Okay. And, again, it looks like this
15 was after the rally on the 12th; is that fair?
16 A. Yes, it looks like it happened after
17 everything.
18 Q. Okay. In the middle of the page, you
19 post a statement that says, "took a deep breath
20 of tear gas and stamped out rolling burning
21 cylinders, while Alex was out there slamming
22 commies in the face."
23 Do you see that?
24 A. Yes.

148. PAGE 360:24 TO 360:25 (RUNNING 00:00:03.725)

24 Q. I'd like to show you a document
25 that's been marked as Exhibit 52.

149. PAGE 361:03 TO 361:18 (RUNNING 00:00:40.753)

03 Q. This is a series of chats on the
04 Charlottesville Vanguard server on Discord dated
05 August 13, 2017, after the rally; agreed?
06 A. Yes.
07 Q. In the middle of the page, you post a
08 statement, just got -- "Just got out of the lame

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09 after party with all the rubbing shoulders and
10 all and can confirm y'all are more fun to party
11 with."
12 Do you see that?
13 A. That's what I said.
14 Q. So you recall an after party that you
15 went to after the rally?
16 A. I don't know exactly what I'm
17 referring to here. I guess it was lame. I don't
18 remember.

 Rousseau, Thomas (Vol. 01) - 10/16/2019

1 CLIP (RUNNING 00:16:02.985)

 Rousseau Vol 1

TR01 27 SEGMENTS (RUNNING 00:16:02.985)



1. PAGE 9:22 TO 10:08 (RUNNING 00:00:18.232)

22 THOMAS RYAN ROUSSEAU,
23 having been first duly sworn, testified as follows:
24 (No omissions.)
25
00010:01 THOMAS RYAN ROUSSEAU
02 EXAMINATION
03 BY MR. SIEGEL:
04 Q. Good morning, Mr. Rousseau. My name is Joshua
05 Siegel. I'm an attorney for the plaintiffs in this
06 litigation.
07 Can you please state your full legal name.
08 A. Thomas Ryan Rousseau.

2. PAGE 12:14 TO 12:17 (RUNNING 00:00:06.042)

14 Q. Do you understand that you're here as a
15 representative of Vanguard America?
16 A. I understand that that's what the document says,
17 yes.

3. PAGE 20:18 TO 22:02 (RUNNING 00:01:42.419)

18 Q. Okay. You said there are conference calls --
19 group conference calls with Jason Kessler leading up to
20 that.
21 When did those occur?
22 A. Sporadically in the -- in the days or weeks
23 leading up to the event. Exact dates or times, I can't
24 say.
25 Q. Would there be any place that lists the exact
00021:01 THOMAS RYAN ROUSSEAU
02 dates and times?
03 A. They were all conducted on the Discord server,
04 which has been thoroughly made public by now. So any
05 reference to them would be there.
06 Q. Who attended these calls?
07 A. Dozens of various people.
08 Q. Can you -- do you remember any of them, other
09 than Jason Kessler and yourself?
10 A. Richard Spencer may or may not have been at
11 them. It's possible. I don't remember exactly.
12 Cantwell may have been at one. It's maybe
13 likely. I don't think that Matthew Heimbach was at them.

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14 Robert Ray did attend a few; one or two.
15 I think that's -- that's about as much as
16 I -- I can remember now, as far as who attended. It was
17 very much a revolving door of various Internet people.
18 Q. How -- approximately, how many calls took place?
19 A. A handful, a few, a batch. I don't know
20 exactly.
21 Q. Less than 10?
22 A. Maybe. Maybe.
23 Q. More than 10?
24 A. Maybe. Around 10, perhaps.
25 Q. Around 10?
00022:01 THOMAS RYAN ROUSSEAU
02 A. Maybe.

4. PAGE 22:09 TO 22:23 (RUNNING 00:00:38.800)

09 Q. How did you find out about these calls? How
10 were they scheduled?
11 A. They were scheduled in a very much outsourcing
12 way on the severer that they were conducted in.
13 Q. What do you mean by --
14 A. The main Discord server that's been the subject
15 of your -- if you looked into the Discord server, the main
16 one, right? I don't know exactly what it was called.
17 They were on that.
18 Q. Was that the Charlottesville 2.0 server?
19 A. That seems like it would be what it was named.
20 I don't remember exactly what it was called.
21 Q. And how did they -- well, who organized these
22 calls?
23 A. Jason Kessler, I believe, most often.

5. PAGE 23:17 TO 25:03 (RUNNING 00:02:12.885)

17 Q. What was the purpose of these calls?
18 A. Mostly for Jason Kessler to talk about what he
19 had been doing in the lead-up to the rally; you know,
20 things about permits, discussing the park. You know, very
21 much Kessler leading the conversation talking about his
22 going-ons. And other people would say various things, but
23 that's what it was primarily about.
24 Then, later on, Elliott Kline would say
25 other things, talking about logistics mainly, in the sense
00024:01 THOMAS RYAN ROUSSEAU
02 of people of meeting at McIntyre's, so that there was less
03 of a chance for, you know, disorganized crowding or
04 people, you know, not -- you know, coming in inopportune
05 methods of transportation. You know, so that everybody
06 was, you know, safer in their manner of going from one
07 place to another.
08 Q. Do you remember which organizations were
09 represented during these calls?
10 A. Which represents -- any number of them, on or
11 off. It had more to do with the personalities than
12 organizations.
13 Q. Do you recall any organizations who had a
14 representative attend one of these calls?
15 A. I do believe that -- that the identity of
16 Evropa, had a -- had a representative in -- in one of
17 them, maybe. I think -- I think Elliott Kline was a
18 member of IA at the time. Was he? I don't know. He
19 might have been.
20 Are you-all considering the Daily Stormer
21 an organization?
22 Q. Was Daily Stormer -- did Daily Stormer --
23 A. Well, Robert Ray was in the calls, like I said.

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24 So if he's representing them, right?
25 If Richard Spencer has an organization,
00025:01 THOMAS RYAN ROUSSEAU
02 right; probably his. That's -- that's -- you know, that's
03 probably as much as I can remember right now.

6. PAGE 25:15 TO 26:07 (RUNNING 00:00:55.758)

15 Q. At the time these calls occurred, what was your
16 role with Vanguard America?
17 A. My role? I did design; I managed the Twitter
18 account; I wrote some stuff on the Web site; did some
19 formatting on the Web site. I was a social media manager,
20 you know, online content producer.
21 Q. Anything other than social media management?
22 A. I did meet up with some of my locals, but that
23 was primarily on a case-by-case basis.
24 Q. Did you post to the Charlottesville 2.0 server?
00026:01 A. In some places, yes, I believe.
THOMAS RYAN ROUSSEAU
02 Q. And that was as a member of Vanguard America?
03 A. As a member, yes.
04 Q. And you attended the calls as a member of
05 Vanguard America?
06 A. I was a member of Vanguard America when I
07 attended the calls.

7. PAGE 90:04 TO 90:11 (RUNNING 00:00:26.460)

04 Q. When you traveled to Charlottesville in August
05 of 2017 --
06 A. Yes.
07 Q. Do you remember the names of any person you
08 traveled with?
09 A. Again, Robert -- Robert Ray was in the party, in
10 one of the vans. I traveled with a person who I knew at
11 the time named Phil; one named Alex.

8. PAGE 90:20 TO 90:25 (RUNNING 00:00:13.564)

20 Q. So the only person that you remember by first
21 name of all the people you traveled to Charlottesville --
22 A. Real name.
23 Q. -- is Ray?
24 A. Yes. The only person I know the full name of,
25 you know, for sure is him, yes.

9. PAGE 103:24 TO 104:21 (RUNNING 00:00:53.989)

24 Q. So what is Vanguard America?
25 A. Well, it was an organization which did a variety
00104:01 THOMAS RYAN ROUSSEAU
02 of things.
03 Q. When you say "organization," was it incorporated
04 ever, or formally an entity?
05 A. I believe it was.
06 Q. Okay. And who -- was it incorporated or do you
07 remember what sort of entity it was?
08 A. I think it was an LLC.
09 Q. Do you remember who formed it?
10 A. Dillon Hopper filed all of the paperwork and the
11 documents.
12 Q. Okay.
13 A. Set the bylaws and such.
14 Q. Okay. Do you know what state he did that in?
15 A. Texas.
16 Q. Do you know why he would say that you're the one
17 that did it?

Sines v Kessler

18 A. Because he wants to act like he wasn't the one
19 that did it. I'm not sure.
20 Q. Do you know when it was formed as an LLC?
21 A. Not exactly. I wasn't the one who did it.

10. PAGE 105:04 TO 105:18 (RUNNING 00:01:09.170)

04 Q. Do you know who any of the members or officers
05 are?
06 A. Dillon Hopper is one of them. He was the pres
07 -- he was listed as president. There was -- I knew
08 another one; his name is Alex. Never knew his last name.
09 I think he lived in Louisiana. And there's another one
10 who lived in Ohio or Indiana, and his name -- Chris maybe.
11 Q. What was Alex's position?
12 A. I think he was part of a listed -- you think you
13 needed -- when Dillon filed, you needed four people, I
14 think, to create an LLC, so he had other people hop onto
15 the -- as like -- I don't know what they were called, you
16 know.
17 Q. You were -- were you one of those people?
18 A. Yes, sir.

11. PAGE 112:16 TO 112:18 (RUNNING 00:00:09.358)

16 Q. When was -- when did you first become affiliated
17 with Vanguard?
18 A. 2016. Maybe, late 2016.

12. PAGE 117:10 TO 117:16 (RUNNING 00:00:16.819)

10 (Exhibit A marked.)
11 Q. (BY MR. SIEGEL) I'm showing you a document
12 that's been marked as Exhibit A.
13 This is a series of texts between you,
14 Dillon Hopper, and afterwards between you and Matthew
15 Heimbach, agreed?
16 A. Correct.

13. PAGE 124:14 TO 125:10 (RUNNING 00:00:58.051)

14 Q. Staying with Exhibit A.
15 A. Sure.
16 Q. Take a look at the second page.
17 These are a series of texts between you and
18 Matthew Heimbach, agreed?
19 A. Correct.
20 Q. Okay. And these are the texts that are
21 currently on one of your Samsung phones?
22 A. Uh-huh.
23 Q. It looks like the top message is cut off. It
24 begins, Meeting tonight at 8:00 with organizers.
25 A. Yeah.
00125:01 THOMAS RYAN ROUSSEAU
02 Q. Do you know what the rest of that message said?
03 A. There is going to be a.
04 Q. But there's prior communications before this
05 page, agreed?
06 A. Yes. It might be on the other one. I know
07 that -- I know the bottom message is the one that's
08 directly on the -- on the right image.
09 So there was a rest of the image, but I
10 don't think it said much beyond just that one.

14. PAGE 129:15 TO 129:17 (RUNNING 00:00:08.129)

15 Q. Look at the last page. It's an image titled
16 Defend Charlottesville August 12th at Lee Park?
17 A. Yep, social media graphic.

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15. PAGE 130:04 TO 130:20 (RUNNING 00:00:33.934)

04 Q. Did you post it to social media?
05 A. Yes.
06 Q. To the Vanguard America Web site?
07 A. I don't know about the Web site, but on the
08 Twitter account.
09 Q. And the Vanguard America Web site, just so we're
10 clear, that was bloodandsoil.org; is that correct?
11 A. That was one of the Web sites, yes.
12 Q. What other Web sites did it have?
13 A. There was a -- there was vanguardamerica.com. I
14 think that online was used later, but those were -- those
15 were all only in Dillon's hands. I -- I -- I didn't have
16 anything to do with those.
17 Q. So bloodandsoil was the one that was in your
18 hands?
19 A. I was an editor of that one, but not any of the
20 other ones.

16. PAGE 141:23 TO 142:12 (RUNNING 00:00:25.866)

23 The question I'm asking you is: Have you
24 met in person everyone who posted to a Discord server --
25 A. No.
00142:01 THOMAS RYAN ROUSSEAU
02 Q. -- affiliated with Vanguard America?
03 A. No.
04 Q. Okay. Do you know personally everyone who has
05 posted to a Discord server --
06 A. No.
07 Q. -- operated by Vanguard America?
08 A. No, I didn't know everyone personally.
09 Q. Have you read everything that's ever been posted
10 to a Discord server --
11 A. No.
12 Q. -- affiliated with Vanguard America?

17. PAGE 151:03 TO 151:08 (RUNNING 00:00:11.765)

03 Q. Okay. Did you keep any sort of roster of
04 members, or list?
05 A. No.
06 Q. Did anyone keep a list of members that you're
07 aware of?
08 A. None that I'm -- none that I'm aware of.

18. PAGE 169:14 TO 169:20 (RUNNING 00:00:11.068)

14 Q. (BY MR. SIEGEL) What was the purpose of having
15 all of these Discord servers?
16 A. To --
17 Q. To Vanguard?
18 A. -- communicate?
19 Q. With members.
20 A. Yes.

19. PAGE 172:12 TO 172:18 (RUNNING 00:00:18.679)

12 Q. Okay. You were in charge of the Southern
13 District server, agreed?
14 A. In charge of? What do you mean?
15 Q. Moderating.
16 A. I guess you could say I was a moderator.
17 Q. And Vanguard Texas as well?
18 A. One of -- one of the moderators.

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20. PAGE 177:14 TO 177:22 (RUNNING 00:00:17.674)

14 (Exhibit 110 marked.)
15 Q. (BY MR. SIEGEL) I'm handing you a document
16 that's been marked as 110.
17 A. 110? Jumped up a few this time.
18 Q. Yeah, we did.
19 A. So, yes.
20 Q. This is an archived copy of the Vanguard
21 American Web site at bloodandsoil.org, agreed?
22 A. That's what it looks like.

21. PAGE 178:07 TO 178:12 (RUNNING 00:00:17.893)

07 Q. Who wrote the copy on the main page, the first
08 page of Exhibit 110?
09 A. I think that was kind of a collaborative thing.
10 Q. Were you one of the collaborators?
11 A. I believe so. You know, social media, Web site
12 editing. That was part of my job.

22. PAGE 182:16 TO 184:14 (RUNNING 00:01:31.742)

16 Q. If you can turn to the next page of the Web
17 site, called Posters and Flyers?
18 A. Posters and Flyers.
19 Q. The next few pages are a series of images.
20 Do you remember creating any of these
21 images?
22 A. Some of them.
23 Q. Which ones?
24 A. The -- so I didn't create all of them in
25 totality. Some of them had assets which were moved
00183:01 THOMAS RYAN ROUSSEAU
02 around.
03 Would that qualify, as well, if I just
04 reformatted something that someone else created?
05 Q. Let's start with the ones that you created.
06 A. In totality?
07 Q. In total.
08 A. I think the last one there with the blue guy
09 with the wrench.
10 Q. Struggle equals nationhood?
11 A. Yeah, that one. The guy -- the one with the
12 shield there at the bottom, you see the one with the
13 stars, right? In the bottom left --
14 Q. Vanguard America for race and nation
15 bloodandsoil.org?
16 A. Yeah, the one above that, I think.
17 Q. Carry the torch of your people?
18 A. Uh-huh. The one with the yellow -- the one with
19 the yellow over there.
20 Q. A notice to all white Americans --
21 A. Yeah.
22 Q. -- it is your civic duty to report any and all
23 illegal aliens --
24 A. The one on the bottom right-hand --
25 Q. -- America is a white nation.
00184:01 THOMAS RYAN ROUSSEAU
02 That one?
03 A. The one on the bottom right, I didn't draw that
04 guy, but I did format the text on it. I don't know if
05 that counts.
06 Q. The Vanguard America joined in the struggle for
07 race and nation. That one?
08 A. Yeah. On the top right, I think I drew that
09 one.

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10 Q. Protect the family, reject degeneracy?
11 A. Yeah. And then below that one.
12 Q. Reject decadence, embrace struggle?
13 A. Yeah. Those are the ones that come to mind
14 right now.

23. PAGE 202:19 TO 203:04 (RUNNING 00:00:31.278)

19 Q. How many members did Vanguard America have?
20 A. I don't -- I don't know. It, obviously,
21 fluctuated over time, but I wasn't -- again, things
22 were -- things were decentralized, so a lot of times there
23 would be people in certain parts of online communication
24 infrastructure which weren't parts of others. So there
25 was no -- there was no real way for me to determine that.
00203:01 THOMAS RYAN ROUSSEAU
02 There could have been maybe upwards of
03 maybe a hundred, tops. That's a complete guess. I -- I
04 don't know.

24. PAGE 209:22 TO 210:14 (RUNNING 00:00:53.542)

22 Q. When I talk about Charlottesville 2.0, I'm
23 referring to the rally in -- on August 11th and 12th,
24 2017.
25 A. Gotcha. So, yes.
00210:01 THOMAS RYAN ROUSSEAU
02 Q. You were involved in planning Vanguard's
03 attendance at that rally?
04 A. In a way, yes.
05 Q. In what way?
06 A. Well, I was managing the -- you know, parts of
07 the local party that I was going with. And I was involved
08 in doing, like, you know, sort of public relations type,
09 encouragement to relaying of messages from leadership, you
10 know, making sure that people were following certain --
11 certain ideas that had been passed down to me.
12 Q. And Discord was the primary method you used to
13 coordinate these activities?
14 A. Yes.

25. PAGE 222:13 TO 222:19 (RUNNING 00:00:18.002)

13 Q. Will you agree with me that you encouraged
14 members to attend the Charlottesville rally in August on
15 Discord?
16 A. Sure, yes.
17 Q. And by that, I mean you communicated on Discord
18 to have members attend the rally personally?
19 A. In terms of encouragement, yes.

26. PAGE 240:25 TO 240:25 (RUNNING 00:00:02.507)

25 (Exhibit 101 marked.)

27. PAGE 241:03 TO 241:15 (RUNNING 00:00:19.359)

03 Q. (BY MR. SIEGEL) This is a post you made to the
04 Vanguard Texas Discord server general discussion
05 channel --
06 A. Uh-huh.
07 Q. -- on August 14th, 2017.
08 A. Uh-huh.
09 Q. And it says, Fields did do nothing, to be
10 honest.
11 A. A joke.
12 Q. I'm sorry?
13 A. A joke.
14 Q. A joke?

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15 A. Yes.

TOTAL: 2 CLIPS FROM 2 DEPOSITIONS (RUNNING 01:04:01.611)