

Sines v Kessler

 Kline, Elliott (Vol. 01) - 08/12/2020

1 CLIP (RUNNING 01:25:37.605)

 Kline Designations

EK01 154 SEGMENTS (RUNNING 01:25:37.605)



1. PAGE 24:14 TO 24:19 (RUNNING 00:00:11.832)

14 Q. Okay. You lived in Greenville,
15 South Carolina, at some point in 2017,
16 correct?
17 A. I was staying with somebody. I
18 wasn't living there. Like, I didn't pay
19 rent or anything like that.

2. PAGE 25:05 TO 25:09 (RUNNING 00:00:07.673)

05 Q. Okay. So who were you living
06 with in Greenville, South Carolina?
07 A. My girlfriend at the time.
08 Q. And is that Sam Frolich?
09 A. Yes.

3. PAGE 25:22 TO 26:13 (RUNNING 00:00:39.919)

22 Q. So you lived with her in
23 Greenville, South Carolina, from June 2017
24 until Unite the Right; is that correct?
25 A. No. Only for like that -- like a
00026:01
02 three-week period in June or four-week
03 period in June, or something like that.
04 Q. And then did you move together to
05 Leesburg, Virginia?
06 A. Yes.
07 Q. Okay. And do you have a
08 recollection of where you -- I'm sorry, of
09 when you moved to Leesburg, Virginia?
10 A. It was shortly after Unite the
11 Right. Two weeks after or something like
12 that. Like a week or two after Unite the
13 Right.

4. PAGE 27:07 TO 27:18 (RUNNING 00:00:27.500)

07 Q. Okay. And you were dating
08 Ms. Frolich throughout the summer of 2017
09 through until about Thanksgiving of 2017;
10 is that correct?
11 A. I don't know when exactly that
12 was done, but, yes, when it began, it was
13 about -- the beginning is correct, about
14 the summer of 2017. But I'm not sure
15 exactly what the end date of that was.
16 Q. Okay. But it was after Unite the
17 Right, correct?
18 A. Yes.

5. PAGE 30:07 TO 30:21 (RUNNING 00:00:48.387)

07 Q. Okay. Let me be clear, then.
08 In 2017, did you consider
09 yourself to be a white nationalist?
10 A. Yes.
11 Q. In 2017, how would you describe

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12 your views with respect to Jewish people?
13 A. I believe that they were
14 different than white people in that they
15 were some -- they were different than white
16 people in that, like, that they were not
17 part of the, what I previously said, which
18 is, you know, protecting white sovereignty,
19 I guess you'd say. So it's a separate
20 group than us, a separate group of white
21 people than white people.

6. PAGE 31:04 TO 31:09 (RUNNING 00:00:04.116)

04 Q. Mr. Kline, we'll be marking this
05 as Exhibit 4.
06 (Plaintiffs' Exhibit 4, Discord
07 post with handle Eli Mosley#5269,
08 marked for identification, as of this
09 date.)

7. PAGE 31:19 TO 32:17 (RUNNING 00:00:55.128)

19 Q. Mr. Kline, do you recognize this
20 as a Discord post by you with the handle
21 Eli Mosley#5269?
22 A. Yes.
23 Q. Okay. And you previously
24 testified that you, during the operative
25 period in this lawsuit, particularly in
00032:01
02 2017, you went by the alternate name Eli
03 Mosley, correct?
04 A. Correct.
05 Q. And that was after the British
06 fascist Oswald Mosley, correct?
07 A. Yes.
08 Q. And do you understand that this
09 is -- actually, I think this is a direct
10 message, excuse me, between yourself and
11 someone with the handle Kurt#8752. And the
12 post is from August 11th, 2017.
13 Do you see that?
14 A. Yes.
15 Q. And you say, "I hate Jews."
16 Do you see that?
17 A. Yes, I see that.

8. PAGE 37:18 TO 37:24 (RUNNING 00:00:13.786)

18 Q. Mr. Kline, doesn't the word
19 "Judenjdger" --
20 MS. PHILLIPS: And for the court
21 reporter, that's J-u-d-e-n-j-a-g-e-r-s.
22 BY MS. PHILLIPS:
23 Q. -- doesn't that mean Jew hunter?
24 A. Oh, yes.

9. PAGE 38:17 TO 40:03 (RUNNING 00:01:19.185)

17 Q. This will be marked as Exhibit 5
18 to the deposition, Mr. Kline.
19 Do you see that this is a Discord
20 post in the NiggKike Bar Mitzvah server,
21 the General channel.
22 Do you see that?
23 A. Yes.
24 Q. And this is a post by you on
25 May 29th, 2017.
00039:01

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02 Do you see that?
03 A. Yes.
04 Q. And you say, "Be Norah."
05 Do you see that?
06 A. Yes.
07 Q. And Norah is in reference to
08 Norah Fox, which was the handle of Samantha
09 Frolich, your ex-girlfriend, your
10 girlfriend at the time, correct?
11 A. Yes.
12 Q. The next line says, "Take Eli to
13 hometown. Tell him he can't troll or
14 reveal power level. Doesn't tell him that
15 the entire town is full of kikes.
16 Judenjdgger's head explodes."
17 Do you see that?
18 A. Yes.
19 Q. So in this context "Judenjdgger's
20 head explodes," you're not referring at all
21 to some Jew infiltrating the Alt-Right, are
22 you?
23 A. In this context, no. I'm just
24 referring to myself. A lot of people
25 called me that specifically because I was
00040:01
02 able to do that. So I was just referring
03 to myself in that last line there.

10. PAGE 44:12 TO 44:13 (RUNNING 00:00:02.234)

12 MS. PHILLIPS: And this will be
13 Exhibit 6 to the deposition.

11. PAGE 44:15 TO 44:25 (RUNNING 00:00:24.982)

15 Q. Do you recognize this, Mr. Kline,
16 as a Discord post in the Alt-Right server,
17 the General channel, by you on June 2nd,
18 2017? Do you see that?
19 A. Yes.
20 Q. And you say, "Um, I'm literally
21 the Judenjdgger."
22 Do you see that?
23 A. Yes.
24 Q. And you posted this, correct?
25 A. I believe so, yes.

12. PAGE 51:02 TO 51:12 (RUNNING 00:00:29.490)

02 Q. Mr. Kline, you've talked about
03 gassing the kikes, correct?
04 A. I joked about that, yes.
05 Q. Okay. What's funny about gassing
06 the kikes?
07 A. I mean, I don't know how to
08 explain humor or the humor that was going
09 at the time, but everything like that is a
10 -- anything like that that I had said was
11 all joking. You know, humor is kind of a
12 complicated subject, I guess.

13. PAGE 52:06 TO 52:14 (RUNNING 00:00:15.437)

06 Q. You don't recall ever using the
07 phrase "ovenning"?
08 A. No, I'm not sure if I did or did
09 not.
10 Q. Okay. Do you understand that
11 phrase to be a reference to sending Jewish

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12 people into ovens to burn?
13 A. I understand that's a joke, like
14 the last one.

14. PAGE 56:10 TO 57:12 (RUNNING 00:00:48.161)

10 Q. Mr. Kline, did you recognize your
11 voice on that audio recording?
12 A. Yup.
13 Q. Okay. And do you recognize that
14 that audio recording is from something
15 called the War Room and it was --
16 A. Yes.
17 Q. -- recorded --
18 I'm sorry, the answer is "yes"?
19 A. Yes.
20 Q. And it was recorded on
21 March 20th, 2017, correct?
22 A. Yes.
23 Q. And you said that you "worked in
24 HR firing spics and niggers all day,"
25 correct?
00057:01
02 A. Yes.
03 Q. And before that, you were in the
04 Army and you got to "kill Muslims for fun,"
05 correct?
06 A. Yes.
07 Q. And you said, "I'm not sure which
08 one was better, watching niggers and spics
09 cry because they can't feed their little
10 mud children or watching Muslim brains
11 spray on the wall," correct?
12 A. Yeah. So the --

15. PAGE 67:02 TO 67:10 (RUNNING 00:00:07.380)

02 MS. PHILLIPS: Katie, let's pull
03 up Tab 16. And we'll mark this as
04 Exhibit 11 to the deposition.
05 (Plaintiffs' Exhibit 11, Email
06 chain beginning with email dated
07 5/15/17 from Campbell to Mosley,
08 Bates-stamped EK00019775 through 19784,
09 marked for identification, as of this
10 date.)

16. PAGE 68:03 TO 68:19 (RUNNING 00:00:34.465)

03 Q. Okay. And do you see where it
04 says, right under that, it says, "The tone
05 of the site should be light. Most people
06 are not comfortable with material that
07 comes across as vitriolic, raging,
08 non-ironic hatred."
09 Do you see that?
10 A. Yes, I see that.
11 Q. And then immediately under that,
12 it says, "The unindoctrinated should not be
13 able to tell if we are joking or not.
14 There should also be a conscious awareness
15 of mocking stereotypes of hateful racists.
16 I usually think of this as self-deprecating
17 humor. I'm a racist making fun of
18 stereotypes of racists because I don't take
19 myself super seriously."

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17. PAGE 68:23 TO 68:25 (RUNNING 00:00:06.803)

23 Q. "This is obviously a ploy, and I
24 actually do want to gas kikes, but that's
25 neither here nor there.

18. PAGE 69:10 TO 69:14 (RUNNING 00:00:09.586)

10 Q. And you followed these
11 guidelines, correct?
12 A. I'm not sure if I got them
13 beforehand, but I did read them before. I
14 have read these before.

19. PAGE 69:24 TO 70:24 (RUNNING 00:00:33.877)

24 (Plaintiffs' Exhibit 12, Direct
25 Message from Mosley to Auernheimer with
00070:01
02 handle weev#2527, marked for
03 identification, as of this date.)
04 BY MS. PHILLIPS:
05 Q. These are direct messages between
06 yourself and someone with the handle Weev,
07 W-e-e-v, hashtag 2527.
08 Do you see that?
09 A. Yup.
10 Q. And Weev is Andrew Auernheimer,
11 correct?
12 A. Yes.
13 Q. And Weev says, "The style guide
14 is a short read. Just try to look it
15 over."
16 Do you see that?
17 A. Yes.
18 Q. That is that is DM to you on
19 March 26th, 2017?
20 A. Yes.
21 Q. Okay. And you say, "Yes. I'll
22 follow it to the T."
23 Correct?
24 A. Yes.

20. PAGE 71:05 TO 71:18 (RUNNING 00:00:38.053)

05 Q. Mr. Kline, do you know what the
06 "day of the rope" is?
07 A. Yes.
08 Q. Okay. What is it?
09 A. It's like joking, kind of like
10 when people will rise up kind of thing.
11 Like kind of like a revolution kind of
12 thing. It's like a nod to, like, a
13 revolution is the best way to describe it.
14 Q. Does it refer to the mass murder
15 of race traders and minorities?
16 A. Some people, it might, but it
17 depends -- it depends who you ask and what
18 the context is.

21. PAGE 73:03 TO 73:24 (RUNNING 00:00:41.506)

03 And this will be marked as
04 Exhibit 13.
05 (Plaintiffs' Exhibit 13, Discord
06 Post on NiggKike Bar Mitzvah server,
07 marked for identification, as of this
08 date.)
09 BY MS. PHILLIPS:

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10 Q. These are a series of reason of
11 posts in the NiggKike Bar Mitzvah server of
12 the General channel. And your posts are
13 the first three. They are from May 19th of
14 2017.

15 Do you see that?

16 A. Yes.

17 Q. All right. And your first post
18 is, "They are scum."

19 The second post is, "They deserve
20 their fate."

21 The third post is, "Goodbye
22 Jews."

23 Do you see that?

24 A. Yes.

22. PAGE 74:04 TO 74:14 (RUNNING 00:00:25.875)

04 Q. The very last post is, "They
05 deserve the rope."

06 Do you see that?

07 A. Yes.

08 Q. Okay. And so that is a reference
09 to the "day of the rope," correct?

10 A. I mean, it's clearly a joke. I'm
11 not sure it's directly referencing the "day
12 of the rope" or anything like that. I just
13 know -- I mean, I'm confident it's a joke
14 just by judging what was said above it.

23. PAGE 82:15 TO 82:18 (RUNNING 00:00:13.058)

15 Q. Okay. And in 2017, you believed
16 in creating a white ethnostate, correct?

17 A. In creating, not -- yeah, yes, I
18 guess you could say that, yeah.

24. PAGE 82:24 TO 84:02 (RUNNING 00:00:41.049)

24 (Plaintiffs' Exhibit 14, Photo,
25 marked for identification, as of this
00083:01 date.)

02 (Plaintiffs' Exhibit 15, Discord
03 Post onNiggKike Bar Mitzvah server,
04 marked for identification, as of this
05 date.)
06

07 BY MS. PHILLIPS:

08 Q. Do you see this is another
09 Discord post by you in the NiggKike Bar
10 Mitzvah server, the General channel, and it
11 looks like it's a March 5th, 2017, post.

12 Do you see that?

13 A. Yes.

14 Q. And you say, "Hail victory,"
15 exclamation point. "We are going to win
16 our ethnostate goys." G-o-y-s.

17 Do you see that?

18 A. Yes, I do.

19 Q. And you say -- the first thing
20 you say here is "hail victory," correct?

21 A. Yes.

22 Q. And "hail victory" is the
23 English translation of "siege heil,"
24 correct?

25 A. I don't know German. I guess it
00084:01 is. I believe it is. I don't know.
02

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25. PAGE 91:03 TO 91:17 (RUNNING 00:00:23.758)

03 (Plaintiffs' Exhibit 18, Discord
04 DM with BellaDashwood#3889, marked for
05 identification, as of this date.)
06 BY MS. PHILLIPS:
07 Q. This is another Discord DM
08 between yourself and someone with the
09 handle BellaDashwood#3889. This is an
10 April 6th, 2017 post by, excuse me, DM by
11 you.
12 Do you see that?
13 A. Yes.
14 Q. And you say, "Ready for RaHoWa.
15 Ready for out-Jewing the Jews."
16 Do you see that?
17 A. Yes.

26. PAGE 95:16 TO 95:20 (RUNNING 00:00:12.219)

16 Q. Okay. At some point, you became
17 a member of IE, correct?
18 A. Yes.
19 Q. When was that?
20 A. I want to say January of 2017.

27. PAGE 96:18 TO 97:07 (RUNNING 00:00:38.609)

18 Q. Okay. Did you have any
19 leadership roles in IE?
20 A. Yes.
21 Q. What were those roles?
22 A. I'm trying to think what the
23 titles were. I don't remember what the
24 titles were, but, yeah, I was basically --
25 I would help with operational stuff, so,
00097:01
02 like, the day-to-day running type of thing
03 of the organization. And then later after
04 Unite the Right, I became, you know, the
05 political leader for only a month or two or
06 something like that, a very short period.
07 And then I left the organization.

28. PAGE 100:18 TO 101:10 (RUNNING 00:00:29.167)

18 Q. Nathan Damigo was the founder of
19 IE, correct?
20 A. Yes.
21 Q. Okay. And that was in May of
22 2016?
23 A. Yes. Sure.
24 Q. Well --
25 A. I don't know the founding date,
00101:01
02 but that sounds probably right.
03 Q. Okay. Mr. -- you're aware that
04 Mr. Damigo punched a woman at an event in
05 Berkeley, California, on April 25th, 2017?
06 A. Yes.
07 Q. Okay. And that event became
08 known eventually as the "Battle of
09 Berkeley," correct?
10 A. Yes.

29. PAGE 107:23 TO 108:14 (RUNNING 00:00:49.577)

23 Q. Okay. Is it fair to say that
24 Nathan's punch had a big impact on

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25 recruiting for Identity Evropa?
00108:01
02 A. Yes and no. We had a lot of
03 people apply, however, the people that
04 applied were not the same people that we
05 wanted, right? So people that were
06 applying weren't necessarily the people
07 that we were looking for. So they might
08 have been excited, like, oh, he punched
09 this, you know, Antifa girl, whatever, and
10 that is so school, and that was the kind of
11 people that we didn't want in the
12 organization. So people applied, but it
13 didn't really get more people that we
14 wanted in the organization.

30. PAGE 108:20 TO 110:07 (RUNNING 00:01:09.654)

20 (Plaintiffs' Exhibit 20, DM
21 Discord between Reinhard Wolff and
22 Norah Fox, marked for identification,
23 as of this date.)
24 BY MS. PHILLIPS:
25 Q. Mr. Kline, these are DMs on
00109:01
02 Discord between Reinhard Wolff and Norah
03 Fox.
04 Do you see that?
05 A. Um-hmm.
06 Q. And Norah Fox, as we talked
07 about, is Sam Frolich, your girlfriend in
08 2017, correct?
09 A. Correct.
10 Q. And Reinhard Wolff is Patrick
11 Casey, correct?
12 A. Correct.
13 Q. And Patrick Casey was an IE
14 member, correct?
15 A. Him and Norah together ran the
16 recruiting stuff, so, yeah.
17 Q. Yeah. Correct.
18 And his post on 4/16/2017, excuse
19 me, his DM says, "Jesus, we're swamped."
20 And beneath that, he says,
21 "Nathan should punch women in the face more
22 often."
23 And Norah Fox says, "Ha, ha, ha,
24 ha, ha."
25 Do you see that?
00110:01
02 A. Yes.
03 Q. Would you agree that the punch,
04 Nathan Damigo's punch of the woman at the
05 Battle of Berkeley made people excited to
06 be part of Identity Evropa?
07 A. I'm not sure. I mean, if that's

31. PAGE 127:15 TO 127:19 (RUNNING 00:00:02.991)

15 And this will be Exhibit 27.
16 (Plaintiffs' Exhibit 27, Chat
17 record with Rob Sowa, Bates-stamped
18 EK0011588, marked for identification,
19 as of this date.)

32. PAGE 128:20 TO 129:22 (RUNNING 00:01:02.596)

20 Q. Okay. And you say, "Yeah, it was

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21 dope. Tackling that Antifa was fucking
22 awesome, and then running through the
23 streets was great. And then I hooked up
24 with some Alt-Right chick from Poland in
25 Spencer's room after the party. LOL."
00129:01
02 Do you see that?
03 A. Yeah.
04 Q. So, again, you wrote "tackling
05 that Antifa was fucking awesome," right?
06 A. Yes. Yeah, I mean --
07 Q. And you were -- at the time, you
08 were working as a bodyguard for Richard
09 Spencer; is that right?
10 A. I mean, at the time, I just went
11 there with him. I wasn't working for him.
12 I wasn't getting paid or anything like
13 that. It wasn't like an official position
14 or anything like that. It was literally we
15 went to do a protest outside the White
16 House because of the bombing in Syria. We
17 wanted to protest against that, by Donald
18 Trump, so we were protesting against Donald
19 Trump. And we also knew that, you know,
20 Richard was -- it was unsafe for Richard to
21 be in D.C. So we were just trying to make
22 sure everyone was safe kind of thing.

33. PAGE 130:04 TO 131:07 (RUNNING 00:00:59.409)

04 (Plaintiffs' Exhibit 28, Discord
05 Post DMs with Andrew Auernheimer,
06 marked for identification, as of this
07 date.)
08 BY MS. PHILLIPS:
09 Q. And these are Discord DMs between
10 yourself and Andrew Auernheimer.
11 Do you see that?
12 A. Yes.
13 Q. And Andrew Auernheimer sends you
14 a DM on April 17th, 2017, that says "White
15 supremacist street fighting is the only way
16 forward politically."
17 Do you see that?
18 A. Yes. He's making a reference
19 joke to a podcast he made.
20 Q. And you respond, "It is awesome,
21 and I'm one of the three body guards for
22 Spencer. Laugh out loud."
23 Do you see that?
24 A. Yes.
25 Q. And then you say, "I get to rough
00131:01
02 up a liberal like three times a week."
03 Do you see that?
04 A. Yeah. I mean I'm obviously
05 joking. This is just me joking with Weev.
06 I mean, his first comment is a joke and my
07 response is another joke.

34. PAGE 133:10 TO 134:21 (RUNNING 00:01:13.510)

10 (Plaintiffs' Exhibit 28, Discord
11 Post DM with Kurt#8752, marked for
12 identification, as of this date.)
13 BY MS. PHILLIPS:
14 Q. This is another Discord DM
15 between yourself and someone with the

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16 handle Kurt#8752. This is on August 6th,
17 2017. You DM'd him.
18 Do you see that?
19 A. Yes.
20 Q. You say, "Right, but I'll have
21 people with me and I'll also be able to
22 pull police and stuff too. Also Antifa
23 sort of knows not to fuck with me. The
24 last person that did, I gave 12 stitches
25 to. LOL."
00134:01
02 Do you see that?
03 A. Yes. So I'm joking with Kirk
04 here.
05 Q. Who is the last person that you
06 gave 12 stitches to?
07 A. I'm sorry, what?
08 Q. Who was the person you gave 12
09 stitches?
10 A. Nobody. That is the joke. That
11 is the joke. The joke was that after that
12 incident, that Antifa person posted on
13 social media, the one that did the glitter
14 bomb thing, they posted on social media
15 bragging like how they, you know, got us,
16 or whatever. And somebody made a repost
17 saying -- like making fun of it saying
18 that, oh, we gave that guy 12 stitches and
19 blah, blah, blah.
20 So the "12 stitches" line is a
21 reference to that. It was the joke.

35. PAGE 135:07 TO 135:25 (RUNNING 00:00:31.053)

07 (Plaintiffs' Exhibit 29, Discord
08 Post DM with #Kurt#8752, marked for
09 identification, as of this date.)
10 (Plaintiffs' Exhibit 30, Discord
11 Post DM with #RealDonaldTrump#3777,
12 marked for identification, as of this
13 date.)
14 BY MS. PHILLIPS:
15 Q. This is another direct message on
16 Discord between yourself and someone with
17 the handle Real Donald Trump#3777.
18 This is from June 12th, 2017, and
19 you say, "Hopefully they put up a better
20 fight than Antifa. Every time I fought
21 Antifa, it lasts like 10 seconds and
22 they've never fought. So boring."
23 Do you see that?
24 A. Yes. I mean, I'm joking with
25 this guy.

36. PAGE 136:22 TO 137:02 (RUNNING 00:00:03.077)

22 Exhibit 31, which will be Tab 43.
23 (Plaintiffs' Exhibit 31, Discord
24 Post DM with #RealDonaldTrump#3777,
25 marked for identification, as of this
00137:01
02 date.)

37. PAGE 137:11 TO 137:17 (RUNNING 00:00:14.322)

11 Q. You used the phrase "Antifa" and
12 "commies" here synonymously, correct?
13 A. Yes.

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14 Q. Okay. You refer to those two --
15 those two terms are used interchangeably;
16 is that accurate?
17 A. Yes, pretty much.

38. PAGE 147:12 TO 147:15 (RUNNING 00:00:10.127)

12 Q. Mr. Kline, you've referred to
13 yourself as evil, correct?
14 A. Maybe as a joke in the past. I
15 don't know. Maybe. Yes. I don't know.

39. PAGE 147:18 TO 147:21 (RUNNING 00:00:03.492)

18 We'll mark this as Exhibit 39.
19 (Plaintiffs' Exhibit 39, Discord
20 Post DM with #Vanguard#2353, marked for
21 identification, as of this date.)

40. PAGE 156:03 TO 157:06 (RUNNING 00:01:04.740)

03 (Plaintiffs' Exhibit 41, Discord
04 Post DM with Caerulus Rex, who is Brian
05 Brathove, marked for identification, as
06 of this date.)

07 BY MS. PHILLIPS:

08 Q. These are direct messages between
09 Caerulus Rex, who is Brian Brathove, and
10 yourself from April 22nd, 2017.
11 And you say, "Ah, all right.
12 Well, see if he is interested. I would
13 love to have him and meet him as well. I
14 mean, I am known as Eli Mosley of the Daily
15 Stormer, i.e., TRS, Counter-Currents, NPI
16 and great friends with League of the South,
17 Vanguard America, and TWP, so I would love
18 to have as many people there represented as
19 possible."

20 Do you see it?

21 A. Yes, I see it.

22 Q. Okay. So you, at least as of
23 April of 2017 were great friends with
24 League of the South, Vanguard America and
25 TWP, correct?

00157:01

02 A. Sort of. I mean yes and no. I
03 wasn't great friends with them. It's not
04 really a good way to describe it. I just
05 knew people in those organizations that I
06 can get ahold of if I need to.

41. PAGE 161:21 TO 162:02 (RUNNING 00:00:12.756)

21 Q. And was a torch march in Lee Park
22 as part of Charlottesville 1.0, correct?

23 A. Yes, that night.

24 Q. Okay. And you participated in
25 that torch march, correct?

00162:01

02 A. Yes.

42. PAGE 167:11 TO 167:12 (RUNNING 00:00:03.208)

11 Q. Okay. Was there an after-party
12 after Charlottesville 1.0?

43. PAGE 167:15 TO 167:22 (RUNNING 00:00:10.825)

15 A. Yes.

16 Q. Okay. And did you attend that

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17 after-party?
18 A. Yes.
19 Q. Okay. And you wrote a Daily
20 Stormer article about Charlottesville 1.0,
21 correct?
22 A. Yes.

44. PAGE 168:05 TO 169:12 (RUNNING 00:00:54.962)

05 (Plaintiffs' Exhibit 43, Daily
06 Storm Article dated 5/16/17 entitled,
07 "Charlottesville Ground Report: Nazi
08 Occultists Resurrect Spirit of
09 Confederacy," marked for
10 identification, as of this date.)
11 BY MS. PHILLIPS:
12 Q. And do you see that picture at
13 the top of the Daily Stormer article?
14 A. Yes.
15 Q. Is that a representation of the
16 torch march from Charlottesville 1.0?
17 A. I believe so, yes.
18 Q. And I'm reading from the second
19 -- sorry, I'll read from the first
20 paragraph.
21 "On Saturday afternoon, a large
22 group of over 200 pro-white activists took
23 to marching on Jackson Park in
24 Charlottesville in what was ostensibly a
25 protest against the local kikes and
00169:01
02 nigroids attempting to destroy Confederate
03 monuments. As a Daily Stormer
04 correspondent who was live on the ground
05 for this momentous occasion, I can give you
06 some insight into the true objectives of
07 the event."
08 A. Yes.
09 Q. Okay. And you were referring to
10 yourself being on the ground at
11 Charlottesville 1.0, correct?
12 A. Yes.

45. PAGE 176:16 TO 176:19 (RUNNING 00:00:11.001)

16 Q. When you were planning events for
17 the Alt-Right, did you use -- was your
18 primary method of communication Discord?
19 A. Yes.

46. PAGE 178:11 TO 178:14 (RUNNING 00:00:07.262)

11 Q. Did you have the authority to
12 kick people off of Discord?
13 A. I mean, on some servers, yes. On
14 some, no.

47. PAGE 178:18 TO 178:20 (RUNNING 00:00:06.048)

18 Q. Okay. And did you exercise that
19 right to kick people off of Discord --
20 A. Not frequently.

48. PAGE 194:23 TO 195:11 (RUNNING 00:00:27.410)

23 Q. All right. I want you to about
24 your communications with some of the other
25 organizers of Unite the Right.
00195:01

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02 Is it fair to say in 2017 that
03 you knew everyone in the Alt-Right?
04 A. Not everyone but I knew a lot of
05 people, yes.
06 Q. Okay. Is it fair to say in 2017
07 you had the contact info for everyone in
08 the Alt-Right?
09 A. Not everyone again, but I knew a
10 lot of people and knew how to get in touch
11 with people, yeah.

49. PAGE 195:15 TO 196:05 (RUNNING 00:00:20.320)

15 (Plaintiff's Exhibit 48, Discord
16 Post DM with TheBigKK#8089, marked for
17 identification, as of this date.)
18 BY MS. PHILLIPS:
19 Q. This is a direct message on
20 Discord between yourself and someone with
21 the handle TheBigKK#8089 from July 28th,
22 2017.
23 Do you see that?
24 A. Yes.
25 Q. You are saying, "I have the
00196:01
02 contact info for everyone in the
03 Alt-Right."
04 Do you see that?
05 A. Yes.

50. PAGE 197:04 TO 197:14 (RUNNING 00:00:25.118)

04 Q. Okay. At that time in 2017,
05 other Alt-Right organizations listened to
06 you because you were a de facto high
07 ranking, correct?
08 A. No, they listened to me because I
09 was part of the people who put together the
10 first one, and I was part of the group that
11 was putting together the second one. It
12 wasn't because I was high ranking or
13 anything like that. There was no ranks
14 between groups or anything.

51. PAGE 198:07 TO 198:14 (RUNNING 00:00:23.422)

07 Q. Okay. When did you first meet
08 Jason Kessler?
09 A. At the rally for -- the antiwar
10 rally in front of the White House.
11 Q. When was that?
12 A. The day after, a couple days
13 after Trump bombed Syria. I don't know the
14 date, but that's when it was.

52. PAGE 198:23 TO 199:04 (RUNNING 00:00:11.909)

23 Q. Okay. And when did you first
24 discuss the idea of Unite the Right with
25 Mr. Kessler?
00199:01
02 A. I think it was that night we
03 talked about it maybe a little bit briefly.
04 And then sometime after that.

53. PAGE 199:09 TO 200:02 (RUNNING 00:00:18.746)

09 (Plaintiffs' Exhibit 49, Chat
10 record with Kessler, Bates-stamped

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11 EK00009660, marked for identification,
12 As of this date.)
13 BY MS. PHILLIPS:
14 Q. This is a text message between
15 you and Mr. Kessler.
16 Do you see that?
17 A. Yes.
18 Q. This is a June 5th, 2017, text
19 message?
20 A. Um-hmm.
21 Q. And you write to him, "You and I
22 should get used to speaking daily now. Now
23 that this is my full-time job, I'll be much
24 more available to you."
25 Do you see that?
00200:01
02 A. Yes.

54. PAGE 200:06 TO 200:08 (RUNNING 00:00:05.820)

06 Q. And you were referring to
07 planning Unite the Right, correct?
08 A. Yeah.

55. PAGE 200:13 TO 201:06 (RUNNING 00:00:30.388)

13 Q. So you agreed with Mr. Kessler to
14 plan Unite the Right with him, correct?
15 A. Yes.
16 Q. And you exchanged text messages
17 obviously with Mr. Kessler about Unite the
18 Right, correct?
19 A. Yes.
20 Q. And you spoke with Mr. Kessler on
21 the phone about Unite the Right, correct?
22 A. Yes.
23 Q. Is it fair to say you spoke with
24 Mr. Kessler nearly every day in the summer
25 of 2017?
00201:01
02 A. Not every day, maybe four or five
03 times a week, though.
04 Q. Multiple times a week, that's
05 fair?
06 A. Yeah, that's fair.

56. PAGE 202:13 TO 203:18 (RUNNING 00:01:20.900)

13 Q. Mr. Kline, is it fair to say that
14 you and Mr. Kessler discussed your views
15 regarding Jewish people in 2017?
16 A. Maybe a little bit. Him and I
17 didn't talk politics too much, I don't
18 think. Overall, it was more a focus on
19 getting the planning and stuff like that
20 done.
21 Q. Is it fair to say that you shared
22 the same views as Mr. Kessler regarding
23 Jewish people in 2017?
24 A. No. Him and I had very different
25 views, I would say.
00203:01
02 Q. How were your views different?
03 A. He didn't seem to care too much
04 about -- I don't really know how to
05 describe it. He had a different focus than
06 the rest of us, I would say. He really
07 want to focus locally, and we were kind of

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08 looking at the national picture, I guess
09 you could say. So we were kind of focused
10 on, you know, other areas, and he really
11 wanted to focus on Charlottesville, if that
12 makes sense.

13 Q. Is it fair to say that you shared
14 with Mr. Kessler your views about black
15 people in 2017?

16 A. No. I think that he had a very
17 -- I mean, maybe him and I had similar
18 views on black people, yes, actually.

57. PAGE 204:05 TO 204:09 (RUNNING 00:00:17.411)

05 Q. Mr. Kline, did you have the same
06 goals for Unite the Right that Mr. Kessler
07 did?

08 A. I'm not sure. Probably not, no.
09 I don't think so.

58. PAGE 204:24 TO 205:14 (RUNNING 00:00:23.974)

24 This is Exhibit 51. It is a post
25 by Mad Dimension on June 5th, 2017, in The
00205:01
02 Alt-Right Events Project server in the
03 General channel.

04 Do you see that?

05 A. Yes.

06 Q. And do you understand that Mad
07 Dimension is Jason Kessler's Discord
08 handle?

09 A. Yes.

10 Q. Okay. And do you see he says,
11 "This event is going to be more like Battle
12 of Berkeley 2"?

13 Do you see that?

14 A. Yes.

59. PAGE 208:20 TO 209:03 (RUNNING 00:00:14.675)

20 Q. Okay. Let's talk about posts in
21 the Discord.

22 Can you identify a single post in
23 the Discord where you advocated for
24 non-violence, a single one, just one.

25 A. I mean, I don't have access to
00209:01
02 these Discord messages. I'd have to go
03 through and look through them.

60. PAGE 209:08 TO 210:02 (RUNNING 00:00:36.923)

08 Q. Okay. But as you sit here right
09 now, you cannot identify a single post that
10 you made in the lead up to UTR advocating
11 for nonviolence; is that right?

12 A. Other than the audio calls that
13 were leaked, no.

14 Q. Well, let's be clear. It was one
15 audio call, correct?

16 A. Well, there is an audio -- yes,
17 there is one audio call that was leaked and
18 then the podcast as well leading up to
19 Unite the Right.

20 Q. Okay. And is it your testimony
21 that the call that was leaked happened a
22 couple of days before Unite the Right?

23 A. Yes.

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24 Q. And by that point, you knew the
25 Discord had been compromised, correct?
00210:01
02 A. I suspected, yeah.

61. PAGE 215:04 TO 216:06 (RUNNING 00:00:56.608)

04 Q. Okay. And you texted with
05 Mr. Damigo about UTR, correct?
06 A. Yes.
07 Q. And you spoke on the phone with
08 Mr. Damigo about UTR, correct?
09 A. Yes.
10 Q. Okay. And you spoke to
11 Mr. Damigo about UTR multiple times through
12 the spring and summer of 2017, correct?
13 A. Yes.
14 Q. And you also exchanged Slack
15 messages with Mr. Damigo, correct?
16 A. Yes, but like I said, I was
17 removed from that Slack at some point. I'm
18 not sure exactly when, though. It was
19 sometime before Unite the Right, I think,
20 but I'm not entirely sure.
21 Q. Okay. You and Mr. Damigo agreed
22 to encourage IE members to attend UTR,
23 correct?
24 A. Yes.
25 Q. Okay. And did you see Mr. Damigo
00216:01
02 at UTR?
03 A. Yes.
04 Q. Where did you -- did you meet up
05 with Mr. Damigo at UTR?
06 A. Yes.

62. PAGE 217:02 TO 217:21 (RUNNING 00:00:59.099)

02 Q. Okay. When did you meet Richard
03 Spencer for the first time?
04 A. I want to say that same
05 January 2017, sometime around there maybe,
06 maybe a little bit before that. I just met
07 him at a dinner someone invited me to.
08 Q. And where was that dinner?
09 A. I think it was in D.C.
10 Q. Who invited you to the dinner?
11 A. I think it was somebody I knew at
12 Identity Evropa. I don't remember who it
13 was but because I was still knew at that
14 time.
15 Q. Okay. And you testified that in
16 the summer of 2017 you occasionally stayed
17 at Spencer's loft, yes?
18 A. Yes.
19 Q. Okay. And you slept on his
20 couch, correct?
21 A. Yes.

63. PAGE 219:16 TO 220:12 (RUNNING 00:00:44.263)

16 Q. Okay. And in 2017, you attended
17 multiple white nationalist events with
18 Richard Spencer, correct?
19 A. Yes.
20 Q. And is it fair to say that he was
21 an important friend of yours during that
22 time period?

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23 A. Yes.
24 Q. And you collaborated with
25 Mr. Spencer on a number of projects related
00220:01
02 to White Nationalism or the Alt-Right?
03 A. Yes.
04 Q. And you provided security for
05 some of his events?
06 A. Yes.
07 Q. Did you discuss with Mr. Spencer
08 his views on Jewish people?
09 A. Occasionally, yes. Yes.
10 Q. Did you discuss with Mr. Spencer
11 his views on black people?
12 A. Yes.

64. PAGE 226:12 TO 229:15 (RUNNING 00:03:17.331)

12 Q. What in the wake of Unite the
13 Right, what did Richard Spencer say that
14 led you to believe that he was a white
15 supremacist?
16 A. There is leaked audio of this as
17 well. It was all over the news a couple of
18 months ago, I guess, of him basically -- I
19 don't remember exactly what he said, but he
20 was very angry. And like I said, he
21 freaked out at Unite the Right. And when
22 he freaked out like that, that made me
23 realize that maybe he wasn't -- didn't have
24 the same views as I did.
25 Q. Okay. And when did you hear that
00227:01
02 recording for the first time?
03 A. I was in the room.
04 Q. When he said this?
05 A. Yes. So I changed my view of him
06 when I was there. It was the day of Unite
07 the Right actually. We had all come back
08 to the house after the day, or whatever,
09 and we were all in a room talking and he
10 went off super angry, and that's when I
11 kind of was like, okay, Richard isn't who I
12 thought he was. But that audio came out
13 later, a couple of months ago, I think.
14 But I was in the actual room when that was
15 said.
16 Q. Okay. Who else was in the room
17 when that was said?
18 A. I think Kessler was. And I know
19 Kessler didn't like what he said. Nathan
20 was. I don't know who else was in the
21 room. I just know it was at least the four
22 of us.
23 Q. Okay. And what were you guys
24 doing in the room prior to Mr. Spencer's
25 rant?
00228:01
02 A. We were talking about -- because
03 at the time, we had just heard about the
04 helicopter crash and then the car incident
05 that happened in Charlottesville. So we
06 had just heard about it, so we were talking
07 about what to do. Like we were trying to
08 figure out what the hell happened basically
09 because we didn't -- no one knew that guy
10 or anything like that, so we were trying to

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11 figure out what happened or what was going
12 on.
13 Q. And why did that lead to Richard
14 Spencer's rant?
15 A. I don't know how that did. I
16 don't know how that led to that. I just
17 know that he did. He went on a crazy rant.
18 Q. Okay. But you don't know what
19 prompted the rant?
20 A. I don't know specifically what
21 made him go off like that, but I know we
22 were in there talking about, hey, you know,
23 this is going on, what do we do.
24 And then he went on a rant. I
25 just don't remember what caused him to go
00229:01
02 on that rant.
03 Q. Why was it you four who were in
04 that room; Spencer, Kessler, Damigo and
05 you?
06 A. I just think -- I mean, we were
07 waiting for people to get back still. We
08 were the ones in that room. We were the
09 ones that were there. I don't think --
10 there wasn't a whole lot of people that
11 were all the way back yet, is basically
12 what it was.
13 Q. Okay. What time of day did that
14 happen, this rant?
15 A. I don't know. It happened after

65. PAGE 231:02 TO 231:04 (RUNNING 00:00:06.195)

02 Q. And he gave you authority to make
03 decisions for him, correct?
04 A. On some things.

66. PAGE 240:08 TO 241:25 (RUNNING 00:01:37.245)

08 Q. Okay. And this is dated
09 July 20th, 2017.
10 And I'll direct your attention to
11 -- well, I'll just read it.
12 "Hey, I have got a question for
13 you actually in the same vein as this that
14 I wanna know your take on. Basically
15 Dr. Duke, who I see as a sort of
16 ideological grandfather since I read his
17 books while in Iraq, wants to speak at
18 Cville. Everyone, and I mean basically
19 everyone I spoke to, from Richard to Nathan
20 to Heimbach to Dr. Hill, et cetera, wanted
21 him to come."
22 Do you see that?
23 A. Yes.
24 Q. Okay. And so does this refresh
25 your recollection that you have in fact
00241:01
02 spoken to Dr. Hill?
03 A. No, I think I spoke to his
04 second-in-command. He said what he thought
05 about it, what Dr. Hill thought about it.
06 Q. Okay. And his second-in-command
07 was Michael Tubbs?
08 A. Yes. I was going to say I hope
09 you remember his name because I don't.
10 That's definitely it, though.
11 Q. Okay. And do you recall -- do

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12 you recall when you spoke with Michael
13 Tubbs about --
14 A. No. This is something that was
15 happening a couple of days, I guess, or
16 weeks leading up to the thing, so it was
17 somewhere around this time.
18 Q. This DM is dated July 20th, 2017,
19 correct?
20 A. Yes. So I would say I probably
21 spoke to all those people the day before
22 that probably.
23 Q. Okay. So sometime in July of
24 2017?
25 A. Correct.

67. PAGE 243:17 TO 243:18 (RUNNING 00:00:03.999)

17 Q. Do you know Matt Heimbach?
18 A. Yes.

68. PAGE 243:22 TO 244:08 (RUNNING 00:00:27.141)

22 Q. When did you meet Mr. Heimbach
23 for the first time?
24 A. I'm not sure the first time I met
25 him. It might have been at Unite the Right
00244:01
02 I -- I'm sorry, the Charlottesville 1.0,
03 rather, the first time we went there. It
04 might have been the first time I met him,
05 but I'm not entirely sure.
06 Q. And at some point, he wanted you
07 to join TWP, correct?
08 A. Yes.

69. PAGE 257:02 TO 257:11 (RUNNING 00:00:23.668)

02 Q. During this time period in 2017,
03 you heavily worked with the VA guys,
04 correct?
05 A. In 2017, beforehand, I would say
06 I was kind of like a liaison, I would say,
07 between -- they had like two or three guys
08 that were, like, organizing their stuff,
09 and I was just talking with those couple
10 guys. I didn't really know a whole lot of
11 people that were in American Vanguard.

70. PAGE 258:03 TO 258:24 (RUNNING 00:00:33.604)

03 (Plaintiffs' Exhibit 56, Discord
04 Post DM with Francisco VA#9092, marked
05 for identification, as of this date.)
06 BY MS. PHILLIPS:
07 Q. This is a DM between yourself and
08 Francisco VA#9092.
09 Do you see that?
10 A. Yes.
11 Q. This is June 7th, 2017, correct?
12 A. Yes.
13 Q. You said, "I'm in total chaos
14 right now trying to work off my cellphone
15 until I get Internet at my new place after
16 my dox. Do me a favor call me tonight or
17 tomorrow so we can chat about some stuff.
18 I've been heavily working with VA guys for
19 a while now and we should have a conference
20 with some leadership on some stuff
21 including Cville." And then you give your

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22 number.
23 Do you see that?
24 A. Yes.

71. PAGE 260:18 TO 262:02 (RUNNING 00:01:14.343)

18 Q. Was he a member of the VA or was
19 he the leader of VA at the time?
20 A. I kind of remember there being
21 some sort of weird who is the leader of the
22 VA thing going on at that time, but I don't
23 know the details or why or anything like
24 that or who was the real leader or
25 anything.
00261:01
02 Q. He was at your after-party with
03 Richard Spencer and --
04 A. No, he was -- they had their own
05 Vanguard America one. It wasn't actually a
06 Vanguard America one. There were multiple
07 people were at an airbnb, and I met him at
08 one of those houses.
09 Q. And was that airbnb, Erika
10 Aleuino's airbnb?
11 A. No, it was a different one.
12 Q. But you were at that after-party
13 and so was Thomas Rousseau?
14 A. Yes. And that was the first time
15 I met him.
16 Q. Okay. Who else was at that
17 after-party?
18 A. I mean, there was a ton of people
19 there. I don't remember any of their names
20 other than I know Azzmador was there. I
21 think Cantwell might have been there, Chris
22 Cantwell. Other than that -- I mean, there
23 were other people there, but I just don't
24 remember -- I don't know any of their names
25 or pseudonyms or anything like that that
00262:01
02 they used.

72. PAGE 263:15 TO 263:24 (RUNNING 00:00:20.121)

15 Q. Okay. Do you know -- you
16 referred to him as Azzmador.
17 Do you know Azzmador?
18 A. Yes, I know him.
19 Q. Okay. And his name is Robert
20 Ray, correct?
21 A. Yes.
22 Q. And when did you first meet
23 Azzmador?
24 A. At Unite the Right as well.

73. PAGE 268:16 TO 269:11 (RUNNING 00:00:46.020)

16 Q. And you invited Daily Stormers to
17 attend Unite the Right, correct?
18 A. Sort of. I just -- they were
19 already -- they weren't really an organized
20 group or anything like that and they were
21 already coming. So it wasn't like I was
22 like here is your invitation to come. Like
23 they were already coming and they were in
24 the Discord and things like that. It was
25 too hard to tell who was who.
00269:01

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02 Q. Is it fair to say you spoke with
03 Andrew Auernheimer and Andrew Anglin about
04 Unite the Right?
05 A. Yes.
06 Q. Okay. And it fair to say that
07 your view was if Andrew Auernheimer and
08 Andrew Anglin told Daily Stormers to come
09 to United the Right, that they would do
10 that, correct?
11 A. Yes.

74. PAGE 270:25 TO 271:20 (RUNNING 00:00:38.060)

25 Q. Okay. And there was a server on
00271:01
02 Discord where Unite the Right was planned,
03 correct?
04 A. Yes.
05 Q. And that was the Charlottesville
06 2.0 server; is that correct?
07 A. Yes.
08 Q. And you posted in that server,
09 correct?
10 A. Yes.
11 Q. And you read posts in that
12 server?
13 A. Occasionally, yes. Mostly in the
14 Leadership channels.
15 Q. And you had moderator authority
16 in that server, correct?
17 A. Yes.
18 Q. And you created channels in that
19 server, correct?
20 A. Yes.

75. PAGE 272:05 TO 272:15 (RUNNING 00:00:23.421)

05 Q. And you used Discord in the
06 summer of 2017, correct?
07 A. Yes.
08 Q. Okay. And you at that time frame
09 in 2017, you were on 36 Discord servers,
10 correct?
11 A. Yes.
12 Q. Okay. And like five Slack chats,
13 correct?
14 A. I think only one. I think I was
15 just in Richard's Slack.

76. PAGE 272:19 TO 272:21 (RUNNING 00:00:02.504)

19 (Plaintiffs' Exhibit 57, Discord
20 Post DM with Big KK, marked for
21 identification, as of this date.)

77. PAGE 272:23 TO 273:07 (RUNNING 00:00:22.589)

23 Q. This is a Discord DM between you
24 and The Big KK from July 28, 2017. And you
25 say, "Like I am in 36 Discord servers and
00273:01
02 like five Slack chats for the Alt-Right. I
03 get like 200 to 300 messages a day between
04 Discord, Twitter, Facebook and Slack, so
05 it's just so tough to keep up."
06 Do you see that?
07 A. Yes.

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78. PAGE 273:24 TO 274:24 (RUNNING 00:00:59.056)

24 Q. Okay. And you were one of the
25 primary organizers of UTR, correct?
00274:01
02 A. Yes.
03 Q. And you've claimed to run the
04 Alt-Right like a military organization in
05 the summer of 2017, correct?
06 A. I mean, yes, but it's kind of a
07 tongue in cheek kind of thing.
08 Q. I'm sorry, so is it your
09 testimony that your statement that you
10 operated the Unite the Right like a
11 military operation was also a joke?
12 A. Not that it was a joke, but it's
13 kind of like tongue in cheek like how well
14 can you run -- how much can you run
15 something like a military where people
16 don't have, like, a hierarchy kind of
17 thing.
18 So, yeah, it was just kind of
19 like -- I wouldn't say as a joke. It was
20 kind of tongue in cheek because people
21 obviously knew it was kind of ridiculous.
22 Q. Planning UTR was your full-time
23 job, correct?
24 A. I mean, yes, yeah.

79. PAGE 275:15 TO 275:18 (RUNNING 00:00:06.463)

15 Q. My question to you, Mr. Kline,
16 was IE helped with a lot of the organizing,
17 correct?
18 A. Yes.

80. PAGE 276:02 TO 276:04 (RUNNING 00:00:04.773)

02 Q. And Patrick Casey was involved in
03 some of the planning, correct?
04 A. Yes.

81. PAGE 277:11 TO 278:24 (RUNNING 00:01:27.246)

11 Q. Okay. You -- sorry. You
12 encouraged IE members to come to UTR,
13 correct?
14 A. Yes.
15 Q. Okay. And Nathan Damigo also
16 encouraged you -- excuse me, also
17 encouraged IE members to come to UTR,
18 correct?
19 A. Yes.
20 Q. And you used Discord to
21 communicate with IE members about UTR,
22 correct?
23 A. Yes.
24 Q. Okay. And you disseminated
00278:01 information to attendees through other
02 organizations, correct?
03 A. Yes.
04 Q. And IE was paying you during the
05 time that you were organizing the rally; is
06 that right?
07 A. Yes.
08 Q. And were you also at that time on
09 Spencer's payroll as well?

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10 A. When I would work for him, yes,
11 but it wasn't like, you know, a biweekly
12 paycheck or something like that.
13 Q. Okay. And that was sort of then
14 throughout 2017; is that right?
15 A. Yeah.
16 Q. And was that mostly in
17 relationship to the bodyguard stuff?
18 A. Um, I'm not sure what the...
19 I mean, I would help him with a
20 ton of, like, weird things to help him
21 with, like helping him get his website
22 done, website work done. Just a bunch of
23 things. I wasn't -- I wasn't being paid as
24 a bodyguard.

82. PAGE 281:07 TO 281:23 (RUNNING 00:00:41.254)

07 Q. Okay. In terms of planning for
08 Unite the Right, you planned each piece of
09 the event, correct?
10 A. No. That's not really accurate
11 to say. I would say I kind of -- the best
12 to describe what I did is I kind of, with
13 Kessler and other people, kind of came up
14 with the broad idea of what we were trying
15 to do, and then communicated to each group
16 kind of what was going on and try to keep
17 each group kind of together, or not
18 together, but on the same page of what was
19 going on for the event.
20 So the best way to describe what
21 I was doing was kind of like I said
22 earlier, like liaison between people,
23 different groups of people.

83. PAGE 282:04 TO 282:25 (RUNNING 00:00:55.662)

04 Q. Okay. Well, you put together a
05 document that outlines each piece of the
06 event, correct?
07 A. Yes, but not everyone attending
08 the event followed -- were part of that
09 group for that document. That document was
10 specifically for people that were, like,
11 free -- that were coming that weren't part
12 of a group. Parts of it were, sure,
13 saying, like, Identity Evropa does this, or
14 whatever, but overall, that's mostly what
15 that document was for, was for people who
16 weren't part of a group.
17 For example, this would be for
18 League of the South and TWP, they organized
19 and planned out basically their whole own
20 thing completely independent of me. I have
21 no idea what their plan was or anything
22 like that. They just knew what time we
23 were coming in and all that other stuff.
24 They didn't -- I didn't know like what
25 their plan was or anything like that.

84. PAGE 287:12 TO 287:18 (RUNNING 00:00:14.494)

12 In any event, you did connect
13 with Matt Heimbach on August 12th, correct?
14 A. Yes.
15 Q. Okay. And you were communicating
16 to him about plans to attend Unite the

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17 Right?
18 A. Yes.

85. PAGE 287:23 TO 289:20 (RUNNING 00:01:40.090)

23 (Plaintiffs' Exhibit 58, Discord
24 group DM with Tyrone#4532,
25 McCarthy#6928, Kurt#8752, Caerulus
00288:01
02 Rex#16, Hines-MI#4894, ShuffOH#8765 and
03 Ajax#5410, marked for identification,
04 as of this date.)
05 BY MS. PHILLIPS:
06 Q. This is Exhibit 58, Mr. Kline.
07 And this is a group DM with Tyrone#4532,
08 McCarthy#6928, Kurt#8752, Caerulus Rex#16,
09 Hines-MI#4894, and you and Shuff,
10 S-h-u-f-f, OH#8765 and Ajax#5410.
11 Do you see that?
12 A. Yes.
13 Q. Okay. And this is August 9th, a
14 post on August 9th, 2017.
15 Do you see that?
16 A. Yes.
17 Q. Okay. And this group of
18 individuals was a security group for UTR,
19 correct?
20 A. Yes.
21 Q. Okay. And what was the purpose
22 of that group?
23 A. I believe that that was Richard
24 Spencer's bodyguards, or whatever.
00289:01
25 Q. Okay. And Ajax is an IE member,
02 correct?
03 A. Yes.
04 Q. And Kurt is an IE member,
05 correct?
06 A. He was. He left the
07 organization, but, yes.
08 Q. But, again, after UTR?
09 A. Yes.
10 Q. And Shuff Ohio is also an IE
11 member, correct?
12 A. Yes.
13 Q. And McCarthy, also an IE member,
14 correct?
15 A. Yes. Actually, I don't know for
16 sure. I don't know if McCarthy is or
17 isn't.
18 Q. Okay.
19 A. Everyone in here is an IE member
20 except for Caerulus Rex.

86. PAGE 290:02 TO 290:24 (RUNNING 00:00:41.618)

02 Q. Okay. And they helped plan
03 aspects of the UTR, correct?
04 A. They did security stuff for
05 Richard specifically.
06 Q. Right. And that was aspects of
07 UTR, correct?
08 A. Yes.
09 Q. Okay. They helped draft various
10 orders on like security and shields,
11 correct?
12 A. Yes.
13 Q. Okay. And you helped with

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14 Kessler planning the timing for certain
15 events, correct?
16 A. Yes.
17 Q. And so specifically you helped
18 plan the timing for the Friday night torch
19 march, correct?
20 A. Yes.
21 Q. And you also helped to plan the
22 timing of the events on Saturday for the
23 Unite the Right event, correct?
24 A. Yes.

87. PAGE 291:04 TO 291:06 (RUNNING 00:00:04.593)

04 Q. You organized and ran the
05 leadership meetings, correct?
06 A. Yes.

88. PAGE 291:11 TO 292:17 (RUNNING 00:01:03.985)

11 (Plaintiffs' Exhibit 59, Discord
12 Post by Eli Mosley#5269, marked for
13 identification, as of this date.)
14 BY MS. PHILLIPS:
15 Q. This is a post by you on July
16 11th, 2017, in the Charlottesville 2.0
17 server and the hashtag Announcements
18 channel.
19 Do you see that?
20 A. Yes.
21 Q. And you say, "Everyone, we are
22 having a leadership meeting in one hour in
23 Discord."
24 Do you see that?
25 A. Yes.
00292:01
02 Q. How often were leadership calls
03 held on the Discord?
04 A. Probably once a week or once
05 every other week, depending on how far out
06 the event was.
07 Q. And who represented each group in
08 the leadership voice chat?
09 A. I don't -- I don't remember who
10 represented each group. I just know each
11 group had one person. Some groups had two
12 maybe, but most groups had one person. I
13 don't remember who represented each group.
14 Q. On average, how many people would
15 attend the leadership voice chats?
16 A. I'm not sure. Maybe a dozen or a
17 little bit more, maybe. I don't know.

89. PAGE 293:10 TO 293:13 (RUNNING 00:00:12.551)

10 Q. And you had a weekly call with
11 Mr. Spencer, Mr. Damigo, and Mr. Kessler
12 that occurred on Wednesdays, correct?
13 A. I believe so, yes.

90. PAGE 294:25 TO 295:04 (RUNNING 00:00:10.620)

25 Q. Okay. Was Mr. Kessler involved
00295:01
02 in those leadership calls?
03 A. He was in some of them. I don't
04 think he went to all of them, though.

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91. PAGE 296:07 TO 296:14 (RUNNING 00:00:21.563)

07 Q. Were either Dr. Hill or Mr. Tubbs
08 in the leadership voice chats?
09 A. Dr. Hill, no. Mr. Tubbs, yes,
10 for sure. He was the one who represented
11 the League of the South. He didn't attend
12 all of them, but when League of the South
13 was there, he was the one representing
14 them.

92. PAGE 296:23 TO 298:02 (RUNNING 00:01:06.397)

23 Q. Okay. And these -- I want it to
24 be clear, these weekly calls, these
25 concerned Unite the Right, correct?
00297:01
02 A. Yes.
03 Q. And the weekly calls that you had
04 with Spencer Damigo and Kessler, those were
05 also about Unite the Right, correct?
06 A. Yes.
07 Q. And I think we talked about this,
08 but just to be clear, you drafted the
09 operational order document for Unite the
10 Right, correct?
11 A. Yeah, I drafted it in Google Docs
12 and I sent it to somebody else and, excuse
13 me, they put it in Microsoft Word or edited
14 it for me, or whatever, and then posted it
15 for everybody else or sent it back to me
16 and I posted it.
17 Q. Okay. And you considered that
18 document to be a military operation
19 document, correct?
20 A. Sort of yes. It was very loose.
21 It was basically just -- you know, it was a
22 very unorganized document. And like it
23 didn't go by the military handbook or
24 anything like that. It was just an
25 organizational document explaining to
00298:01
02 people what was going on.

93. PAGE 298:07 TO 299:25 (RUNNING 00:01:13.201)

07 (Plaintiffs' Exhibit 60, Chat
08 record with Richard Spencer,
09 Bates-stamped EK00006584, marked for
10 identification, as of this date.)
11 BY MS. PHILLIPS:
12 Q. And this is a text message from
13 you to Richard Spencer.
14 Do you see that?
15 A. Yes. Sorry. Is it to me from
16 Richard or --
17 Q. No, from you, from 610 -- do you
18 see --
19 A. Yes.
20 Q. -- to Richard Spencer on
21 July 16th, 2017.
22 Do you see that?
23 A. Yes.
24 Q. Okay.
25 MS. PHILLIPS: And, Katie, if you
00299:01
02 can scroll down, please.
03 BY MS. PHILLIPS:

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04 Q. The substance of the text is, (As
05 read) "These people are insane. This is a
06 Facebook post about them doing a pre-event
07 to prepare for Cville. Look at this
08 corporate language compared to our literal
09 military operation documents. They are
10 little corporate tools and we're a
11 resistance fighting force. I hate this
12 morons."

13 Do you see that?

14 A. Yes.

15 Q. And this -- when you're referring
16 to "our literal military operation
17 document," you are talking about the
18 operation document that you drafted on
19 Google Docs, correct?

20 A. Yes.

21 Q. Okay. And you referred to
22 yourself and the other planners of Unite
23 the Right as a "resistance fighting force,"
24 correct?

25 A. Yes.

94. PAGE 306:06 TO 306:10 (RUNNING 00:00:10.111)

06 Q. Okay. And you, in terms of your
07 planning and organizing, you said you were
08 the liaison between various other groups
09 and individuals involved with UTR, correct?
10 A. Yes.

95. PAGE 306:15 TO 307:15 (RUNNING 00:00:53.783)

15 Q. And you organized and directed
16 phone calls with the police, correct?

17 A. Yes.

18 Q. And at some point, you spoke with
19 the police directly; is that correct?

20 A. Yes.

21 Q. And I believe you said it was a
22 detective; is that correct?

23 A. Yes. It was a detective -- I
24 want to say his first name was John, but I
25 don't know for sure. You know what I mean?

00307:01

02 Like that's a pretty common name, so...

03 Q. Okay.

04 A. But I just remember speaking to a
05 detective from Charlottesville.

06 Q. Okay. And you spoke with that
07 person one time, correct?

08 A. Yes.

09 Q. And otherwise the communication
10 between organizers of UTR and the police
11 happened through Caerulus Rex, is that
12 right, Brian Brathove?

13 A. Yes, him and I think Tubbs, the
14 guy from League of the South, he also had
15 contacted the police as well.

96. PAGE 308:09 TO 309:10 (RUNNING 00:01:21.116)

09 Q. And you made the decision about
10 how to involve David Duke at UTR, correct?

11 A. Yes and no. I had originally
12 said no David Duke. I was the only one and
13 I couldn't -- well, me and Kessler were the
14 only ones saying no, pretty much, and

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15 everyone else was kind of saying yes.
16 And then I guess -- I don't even
17 remember exactly how it happened, but it
18 ended up being he was coming anyway. I
19 don't remember if I had budged or Kessler
20 had budged or if people just said fuck you,
21 we're bringing him, or whatever.
22 Q. You helped decide who some of the
23 speakers at UTR would be, correct?
24 A. Yeah, that was mostly Kessler who
25 dealt with and did the whole speaker thing,
00309:01
02 but I helped him out a little tiny bit.
03 Q. And you helped to decide who
04 would be encouraged to come to UTR, which
05 groups would be invited, correct?
06 A. Generally, yes.
07 Q. And you encouraged individuals
08 from Vanguard to, Vanguard America, excuse
09 me, to come to UTR, correct?
10 A. Yes.

97. PAGE 311:08 TO 311:10 (RUNNING 00:00:09.060)

08 Q. Okay. And you gave instructions
09 to other groups coming, correct?
10 A. Yes.

98. PAGE 312:03 TO 312:11 (RUNNING 00:00:12.341)

03 (Plaintiffs' Exhibit 61, Chat
04 record with Kessler, Bates-stamped
05 JK00030209 through 30210, marked for
06 identification, as of this date.)
07 BY MS. PHILLIPS:
08 Q. So these are text messages
09 between you, the 610 number and
10 434-996-5567, which is a phone number we've
11 seen before today. It's Jason Kessler's.

99. PAGE 313:07 TO 313:15 (RUNNING 00:00:25.550)

07 Q. And the substance of the text
08 message says, "Give me your opinion on this
09 press release from Kyle Chapman."
10 And then it says "For immediate
11 release."
12 A. Oh, okay.
13 Q. So you see the press release?
14 A. Yeah, I mean, I see this, but I
15 mean -- hold on.

100. PAGE 313:23 TO 315:09 (RUNNING 00:01:05.054)

23 Q. The substance of the text says,
24 "I think it's all right except he kind of
25 backs himself in the corner by pretending
00314:01
02 some of our guys aren't Nazis. I think he
03 needs more wiggle room just in case there
04 are salutes."
05 Do you see that?
06 A. Yes.
07 Q. Okay. So does this refresh your
08 recollection about receiving the press
09 release that Chapman put out?
10 A. I don't really remember this
11 conversation too much, but it seems to me
12 like -- I don't really approve his thing,

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13 but somebody sent it to me for an opinion.
14 Q. Well, Mr. Kessler did, correct?
15 A. Yes, exactly.
16 Q. With whom you were organizing the
17 event?
18 A. Yes, Kessler. But it wasn't like
19 I had a final approval on what Kyle Chapman
20 posted or anything like that.
21 Q. Understood.
22 But you could clearly weigh in,
23 correct?
24 A. Yes.
25 Q. And the only concern raised here
00315:01
02 is that Mr. Chapman "backs himself in the
03 corner by pretending some of our guys
04 aren't Nazis," correct?
05 A. Yes.
06 Q. Okay. No other concerns raised
07 about the rest of the substance of the
08 press release, correct?
09 A. Correct.

101. PAGE 316:22 TO 318:04 (RUNNING 00:00:47.097)

22 (Plaintiffs' Exhibit 62, Chat
23 record with Kessler, Bates-stamped
24 EK00009720 through 9721, marked for
25 identification, as of this date.)
00317:01
02 BY MS. PHILLIPS:
03 Q. Do you see that this is -- there
04 we go.
05 This is -- participants are the
06 610 number, yours, and the 434 number,
07 Jason Kessler's.
08 Do you see that?
09 A. Yes.
10 Q. Okay. And the text message says,
11 "It seems that we have a pretty nice
12 digital flyer at this point. Only question
13 is whether to put Spencer and Hyde in
14 there."
15 Do you see that?
16 A. Yes.
17 Q. Okay. If you go down, this was
18 one promotional flyer for the event,
19 correct?
20 A. Yes.
21 Q. Okay. And this flyer has
22 obviously Confederate flags on it, correct?
23 A. Yes.
24 Q. And militia with guns, correct?
25 A. Yes.
00318:01
02 Q. Okay. And symbols of Nazi
03 Germany, correct?
04 A. Yes.

102. PAGE 321:10 TO 321:21 (RUNNING 00:00:17.747)

10 Q. And the chants that the
11 organizers of UTR approved were, "You will
12 not replace us," correct?
13 A. Yes.
14 Q. And "Jews will not replace us,"
15 correct?
16 A. No, that was not an approved

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17 chant.
18 Q. Okay. But it was in fact a
19 chant, correct?
20 A. Yeah, I mean, yes, on that Friday
21 night.

103. PAGE 324:13 TO 324:15 (RUNNING 00:00:04.735)

13 Q. And "You will not replace us" is
14 an Identity Evropa chant, correct?
15 A. Correct.

104. PAGE 327:14 TO 327:18 (RUNNING 00:00:12.229)

14 Is it fair to say that you and
15 Spencer and other of the planners and
16 organizers for UTR set the strategy,
17 quote/unquote, for Charlottesville?
18 A. Yes.

105. PAGE 328:10 TO 329:21 (RUNNING 00:01:22.108)

10 Q. Mr. Kline, we talked about how
11 you were a member of Identity Evropa and
12 how you had a leadership role at Identity
13 Evropa, correct?
14 A. Yes.
15 Q. And you had the authority to
16 approve activism for Identity Evropa
17 members, correct?
18 A. Yes. My general area, though,
19 mostly. If people in California wanted to
20 do something -- mostly in my general area,
21 but if people wanted to do something out in
22 California, for example, I had no say in
23 that.
24 Q. And Mr. Damigo also obviously had
25 authority to approve activism for IE,
00329:01
02 right?
03 A. Yes.
04 Q. And Mr. Damigo trusted you to
05 approve activism form IE members, correct?
06 A. Yes.
07 Q. Okay. And he trained you to do
08 so, correct?
09 A. Yes.
10 Q. And Mr. Damigo nominated you to
11 be the PR representative for Identity
12 Evropa, correct?
13 A. Yes.
14 Q. Okay. And there were regular
15 conferences for from the PR reps from the
16 different groups, correct?
17 A. Yes.
18 Q. Okay. And that was to assist in
19 planning Unite the Right, correct?
20 A. That and the general running of
21 IE.

106. PAGE 331:05 TO 331:20 (RUNNING 00:00:21.816)

05 (Plaintiffs' Exhibit 64, Chat
06 record with Richard Spencer,
07 Bates-stamped RS00095071, marked for
08 identification, as of this date.)
09 BY MS. PHILLIPS:
10 Q. This is Exhibit 64. And this is
11 a text message from Richard Spencer, the

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12 571 number.
13 Do you see that?
14 A. Yes.
15 Q. To you, the 610 number, correct?
16 A. Yes.
17 Q. And this is dated June 14th,
18 2017.
19 Do you see that?
20 A. Yes.

107. PAGE 331:25 TO 332:05 (RUNNING 00:00:06.310)

25 Q. You see the body of the text
00332:01
02 message from Mr. Spencer is, "This is going
03 to be a violent summer."
04 Do you see that?
05 A. Yes.

108. PAGE 332:18 TO 334:17 (RUNNING 00:02:13.890)

18 Q. One of the goals of holding Unite
19 the Right was to hear the speeches,
20 correct?
21 A. Yes.
22 Q. Okay. And another goal of Unite
23 the Right was to step out of the shadows,
24 so to speak?
25 A. Yes.
00333:01
02 Q. Another goal of Unite the Right
03 was to stand up against other racists?
04 A. No.
05 Q. Was -- a goal in holding Unite
06 the Right was to express your views about
07 race?
08 A. About race in general, yes.
09 Q. Was a goal in holding Unite the
10 Right to create an ethnostate?
11 A. No.
12 Q. Was the goal in holding Unite the
13 Right to unite white nationalists against
14 other racists?
15 A. No.
16 Q. Instilling fear, that was a goal
17 of Unite the Right?
18 A. No.
19 Q. What about to be a battle in
20 RaHoWa, was that a purpose of Unite the
21 Right?
22 A. No.
23 Q. What about confrontation, to have
24 a confrontation, was that a goal of Unite
25 the Right?
00334:01
02 A. No.
03 Q. Did you see UTR as a significant
04 event?
05 A. Yes.
06 Q. And you anticipated that violence
07 would occur at Unite the Right?
08 A. Against us, yes.
09 Q. You were aware that some
10 participants on Discord thought UTR would
11 turn into a shootout, correct?
12 A. Because we were going to be
13 attacked, yes.
14 Q. You thought that it was a

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15 possibility that UTR would turn into a
16 street brawl, correct?
17 A. Yes, from us getting attacked.

109. PAGE 334:21 TO 336:16 (RUNNING 00:01:17.538)

21 (Plaintiffs' Exhibit 65, Discord
22 Post DM with Heinz-MI 4894, marked for
23 identification, as of this date.)
24 BY MS. PHILLIPS:
25 Q. This is direct messages between
00335:01
02 yourself and Heinz-MI 4894.
03 And we've talked about this, but
04 Heinz is a member of IE, correct?
05 A. Yes.
06 Q. And these messages are sent on
07 August 10th, 2017, correct?
08 A. Yes.
09 Q. And you said Eli -- Heinz said,
10 "Eli, what is your opinion of having a
11 group of people that are open-carrying
12 acting as a QRF in case SHTF."
13 Do you see that?
14 A. Yes.
15 Q. QRF means "quick reaction force,"
16 correct?
17 A. Yes.
18 Q. And SHTF means "shit hits the
19 fan," correct?
20 A. Yes.
21 Q. Okay. And Heinz says, "Kurt is
22 talking to me and is convinced this will
23 turn into a shoot-out."
24 Do you see that?
25 A. Yes.
00336:01
02 Q. And we talked about Kurt as well.
03 Kurt is also a member of IE,
04 correct?
05 A. Yes.
06 Q. And he was a member of that
07 security force that we talked about
08 previously for Richard Spencer, correct?
09 A. Yes.
10 Q. Okay. And you see Heinz also
11 says, "I don't want to arm everybody and
12 have them wear battle rattle because that
13 would essentially hamstring them if this
14 turns into a street brawl."
15 Do you see that?
16 A. Yes.

110. PAGE 339:24 TO 340:19 (RUNNING 00:00:30.359)

24 (Plaintiffs' Exhibit 67, Discord
25 Post DM with Kurt#8752, marked for
00340:01
02 identification, as of this date.)
03 BY MS. PHILLIPS:
04 Q. This is a post or, excuse me, a
05 series of posts in the Charlottesville 2.0
06 server. The Flags, Banners and Signs
07 channel.
08 Do you see that?
09 A. Yes.
10 Q. And that first post is from that
11 same Kurt individual who we saw posting

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12 about women being at Charlottesville as an
13 undue risk in Exhibit 66.
14 Do you see that?
15 A. Yes.
16 Q. And here he's saying, "Impaling
17 people is always the best option TBH."
18 Do you see that?
19 A. Yes.

111. PAGE 342:16 TO 342:19 (RUNNING 00:00:10.736)

16 Q. Okay. And you posted -- well,
17 had DMs with Andrew Anglin about
18 anticipating violence at UTR, correct?
19 A. Perhaps, yes.

112. PAGE 342:23 TO 343:17 (RUNNING 00:00:29.156)

23 (Plaintiffs' Exhibit 68, Discord
24 Post DM with Andrew Anglin, marked for
25 identification, as of this date.)
00343:01
02 BY MS. PHILLIPS:
03 Q. This is messages, direct messages
04 on Discord between yourself and Andrew
05 Anglin. The date is July 20th, 2017. He
06 said, "I think we are going to see some
07 serious brawls at Cville next month too and
08 we'll see blood on some of these white
09 polos. Laugh out loud."
10 Correct?
11 A. Yes.
12 Q. Okay. And the blood on white
13 polos -- strike that.
14 White polos are part of the
15 uniform for some members of the Alt-Right,
16 correct?
17 A. Yes.

113. PAGE 345:04 TO 345:08 (RUNNING 00:00:08.207)

04 Q. And I think we've talked about
05 this, but you referred to the Alt-Right
06 rally goers as a resistance fighting force,
07 correct?
08 A. Yes.

114. PAGE 356:16 TO 357:08 (RUNNING 00:00:21.531)

16 (Plaintiffs' Exhibit 72, Discord
17 Post DM dated 8/11/17 in
18 Charlottesville server, the Leadership
19 Discussion channel, marked for
20 identification, as of this date.)
21 BY MS. PHILLIPS:
22 Q. This is a post by you on
23 August 11th, 2017, on the Charlottesville
24 server, the Leadership Discussion channel.
25 And you say, "At everyone. I need to get
00357:01
02 in touch with one of the fake Antifa
03 account people stat. Please get them in
04 touch with me. Preferably one of the more
05 believable ones. Please utilize your
06 networks for this."
07 Do you see that?
08 A. Yes.

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115. PAGE 360:15 TO 360:22 (RUNNING 00:00:11.963)

15 Q. And you're familiar -- we talked
16 a bit about it, but you are familiar with
17 the torch march that took place on
18 August 11th, 2017, correct?
19 A. Yes.
20 Q. And that was a torch march across
21 UVA's campus, correct?
22 A. Yes.

116. PAGE 361:11 TO 361:22 (RUNNING 00:00:30.561)

11 Q. I'm asking you, if you're a
12 Jewish person and you see at nightfall a
13 group of white nationalists or white
14 supremacists carrying torches, would that
15 cause you to be fearful?
16 A. I have no idea.
17 Q. Is it fair to say that if you're
18 an African-American person and at nightfall
19 you see a group of white supremacists
20 carrying torches, that that would cause you
21 as a black person to be fearful?
22 A. I have no idea.

117. PAGE 372:09 TO 372:23 (RUNNING 00:00:31.414)

09 Q. And were attendees encouraged to
10 buy their torches in advance?
11 A. Yes.
12 Q. And was that to ensure that
13 everybody could get them?
14 A. Yeah.
15 Q. And attendees were also
16 encouraged to bring lighter fluid, correct?
17 A. Just the people -- just the
18 people who were bringing, like, multiple
19 torches for other people.
20 Q. Okay. But people were encouraged
21 to bring lighter fluid to light the
22 torches, correct?
23 A. Yes.

118. PAGE 372:24 TO 373:04 (RUNNING 00:00:12.544)

24 Q. And we talked about the torch
25 march was kept a secret, correct?
00373:01
02 A. Yes. It was not leaked -- it was
03 leaked, I guess, but it wasn't as public as
04 the rest of the rally and stuff.

119. PAGE 373:11 TO 373:14 (RUNNING 00:00:06.276)

11 Q. Okay. You did believe that the
12 torch march should not be made public,
13 correct?
14 A. Yes.

120. PAGE 376:20 TO 377:24 (RUNNING 00:01:01.857)

20 Q. Where did you stay in
21 Charlottesville?
22 A. Somebody's airbnb. I'm not sure
23 whose.
24 Q. You mean somebody in the
25 Alt-Right?
00377:01

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02 A. Yes.
03 Q. And who else were you staying
04 with at the airbnb?
05 A. I'm not sure who else was at the
06 house. There were a bunch of people from
07 Identity Evropa, basically. It was like an
08 Identity Evropa airbnb.
09 Q. And is that location, that
10 Identity Evropa airbnb, was that the
11 location of the meeting between you and
12 Nathan Damigo and Richard Spencer and Jason
13 Kessler when Richard Spencer went on his
14 tirade that you testified about earlier?
15 A. Yes.
16 Q. Okay. There was a leadership
17 meeting at McIntire Park before the torch
18 march.
19 Is that the meeting that you're
20 talking about?
21 A. Yes.
22 Q. Okay. And Mr. Cantwell was
23 there, correct?
24 A. Yes, I think he was, yeah.

121. PAGE 381:18 TO 382:14 (RUNNING 00:01:01.588)

18 A. I had, what are they called, the
19 speakerphones -- I can't think.
20 Q. A bullhorn?
21 A. No. One of those things you
22 speak into, not a bullhorn, but -- I can't
23 remember the name of it. But I had one of
24 the -- like a walkie-talkie thing with,
25 like, a sound projector on the end of it.
00382:01
02 Q. Is that because you were leading
03 the group on the route?
04 A. It was mostly to get people to
05 get in line and get going, not necessarily
06 on the route. Because the route was so
07 spread out that they wouldn't be able to
08 hear me anyway. But it was mostly to let
09 people know to get ready to go and line up
10 and then go.
11 Q. And you had drones -- the group
12 had drones flying in advance of the route,
13 correct?
14 A. Yes.

122. PAGE 383:20 TO 384:08 (RUNNING 00:00:21.735)

20 Q. Okay. And you came to the
21 rotunda at the top of the lawn, correct?
22 A. Yes.
23 Q. And the group went around the
24 rotunda, correct?
25 A. Yes.
00384:01
02 Q. And then went down a set of
03 stairs to get to the Thomas Jefferson
04 statue; is that correct?
05 A. Yes.
06 Q. And there were students
07 surrounding the statue, correct?
08 A. Yes.

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123. PAGE 384:17 TO 385:04 (RUNNING 00:00:25.195)

17 Q. And they had -- the Alt-Right
18 individuals who were marching in the torch
19 march had surrounded the students at the
20 statue, correct?

21 A. Yes.

22 Q. Okay. Did you see the
23 counter-protesters with any signs?

24 A. Not that I remember or
25 recognized.

00385:01

02 Q. Okay. Did you see any of them
03 with weapon cons?

04 A. Not that I remember.

124. PAGE 395:05 TO 395:21 (RUNNING 00:00:45.355)

05 Q. Okay. And in your view, the
06 torch march as a success, correct?

07 A. Generally speaking, yes.

08 Q. And you told -- you texted
09 Mr. Kessler that evening and said "Great
10 work," correct?

11 A. Yes.

12 Q. Did you at any point on
13 August 11th, in evening of August 11th,
14 disavow any other violence that occurred
15 that night?

16 A. I wasn't -- I don't know who
17 started or what was going on so --

18 Q. That wasn't my question.

19 I'm asking you if you disavowed
20 any of the violence that occurred?

21 A. I'm unsure.

125. PAGE 398:20 TO 399:15 (RUNNING 00:00:20.024)

20 (Plaintiffs' Exhibit 74, Discord
21 Post DM between Nathan Damigo and Fashy
22 Haircut, marked for identification, as
23 of this date.)

24 BY MS. PHILLIPS:

00399:01

25 Q. This is a Discord post by Nathan
02 Damigo.

03 Do you see that?

04 Fashy Haircut is his handle,
05 correct?

06 A. Yes.

07 Q. And it's a post from August 10,
08 2017, in the Identity Evropa server, the
09 Announcements channel. And it says, "At
10 everyone. We will be going to
11 Charlottesville with or without a permit.
12 The city council can go shove their permit
13 up their ass."

14 Do you see that?

15 A. Yes.

126. PAGE 400:02 TO 400:05 (RUNNING 00:00:05.662)

02 But like I said, with or without
03 a permit, you guys were going to go,
04 correct?

05 A. Yes.

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127. PAGE 401:10 TO 401:16 (RUNNING 00:00:03.124)

10 (Plaintiffs' Exhibit 75, Chat
11 record with Kessler, Bates-stamped
12 JK00030593, marked for identification,
13 as of this date.)
14 BY MS. PHILLIPS:
15 Q. This is being marked as
16 Exhibit 75, Mr. Kline. And this is a text

128. PAGE 403:17 TO 404:11 (RUNNING 00:00:47.434)

17 Q. Okay. And who did you meet up
18 with at McIntire Park?
19 A. The other people that were
20 running, like, the convoys to get the
21 people to the park itself.
22 Q. And who was that?
23 A. The various different groups that
24 were going in with us. Identity Evropa
25 members, people like that. I don't know, I
00404:01
02 don't know exactly who it was. But it was
03 just the normal people that were going that
04 were part of -- the people that were part
05 of our group that were going in is who --
06 Q. By your group, you mean Identity
07 Evropa?
08 A. Identity Evropa and anyone that
09 was not part of a group but was also part
10 of, you know, the planning that we had
11 done.

129. PAGE 410:22 TO 411:04 (RUNNING 00:00:24.676)

22 Q. Okay. And you saw two or three
23 street brawls, correct?
24 A. Yes.
25 Q. Okay. And you were yelling,
00411:01
02 yelling out orders as you were walking
03 along toward Emancipation Park, correct?
04 A. Yes.

130. PAGE 411:09 TO 411:13 (RUNNING 00:00:09.221)

09 MS. PHILLIPS: Katie, I would
10 like to pull up Tab 244, which is a
11 video. And I'd like to -- at the
12 outset we'll just play the first
13 32 seconds of the video, please.

131. PAGE 411:14 TO 411:14 (RUNNING 00:00:34.434)

14 (Video playing at this time.)

132. PAGE 411:18 TO 411:20 (RUNNING 00:00:07.862)

18 Q. And that was you, correct, in the
19 white polo, Mr. Kline, yes?
20 A. Yes.

133. PAGE 412:13 TO 412:24 (RUNNING 00:00:21.379)

13 My question was: Is this an
14 accurate the video of what was happening,
15 what you were doing in part on August 12th,
16 2017 at Unite the Right?
17 A. Yes.
18 Q. Okay. And you were yelling

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19 orders at this group of rally-goers,
20 correct?
21 A. Yes.
22 Q. And you were leading them on the
23 ground, correct?
24 A. Yes.

134. PAGE 414:10 TO 414:15 (RUNNING 00:01:06.610)

10 (Plaintiffs' Exhibit 76,
11 Audio/Video, marked for identification,
12 as of this date.)
13 MS. PHILLIPS: Let's keep 76 and
14 play from the 30-second mark until a
15 minute, 27, please.

135. PAGE 414:20 TO 415:23 (RUNNING 00:01:13.919)

20 Q. And did you see that blond man
21 there who's sort of the middle of the video
22 with sunglasses and tape around his hands,
23 do you see him? He's got on a white shirt.
24 A. Yes, I see him.
25 Q. Do you recognize that as Ben
00415:01
02 Daley?
03 A. I'm not sure who that is.
04 Q. Okay. But did you see in that
05 video that he was punching protesters?
06 A. After they completely blocked off
07 the street and assaulted us, yes.
08 Q. We can play the video again, but
09 where did you see any counter-protester
10 assault anybody?
11 A. You didn't see the entire
12 counter-protesters blocking us from our
13 right-of-way on the sidewalk? I mean --
14 Q. Standing in your way -- are you
15 equating standing in your way blocking
16 somebody at -- sorry --
17 A. Denying someone the right of
18 passage through force on a public sidewalk,
19 yes.
20 Q. Okay. All right.
21 And then you saw the blond
22 gentleman punching several people, correct?
23 A. Yes.

136. PAGE 417:22 TO 417:25 (RUNNING 00:00:02.876)

22 And this will be Exhibit 77.
23 (Plaintiffs' Exhibit 77, Photo,
24 marked for identification, as of this
25 date.)

137. PAGE 418:06 TO 418:10 (RUNNING 00:00:10.922)

06 Q. And can you see the gentleman in
07 the white cap, Mike Miselis right here, do
08 you see how his hands are wrapped like
09 boxers, both hands?
10 A. Yes.

138. PAGE 418:17 TO 419:13 (RUNNING 00:00:38.906)

17 (Plaintiffs' Exhibit 78, Photo,
18 marked for identification, as of this
19 date.)
20 BY MS. PHILLIPS:

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21 Q. All right. Mr. Kline, do you see
22 yourself in the middle of the crosswalk
23 there pointing with your right hand?
24 A. Yes.
25 Q. Okay. And do you see that Mike
00419:01
02 Miselis, with the red cap and the hands
03 taped up like boxers, is sort of behind you
04 in the crosswalk?
05 Do you see that?
06 A. Yes. I'm telling him to keep
07 moving.
08 Q. Yes. And Ben Daley is also right
09 in front of you there with at least his
10 right hand that we can see and his left
11 hand there also both taped up like boxers.
12 Do you see that?
13 A. Yes.

139. PAGE 420:23 TO 421:09 (RUNNING 00:00:19.281)

23 Do you see what Mr. Daley is
24 carrying in his right hand?
25 Is that a PVC pipe?
00421:01
02 A. I'm not sure what that is.
03 Q. Well, did you see it when you
04 were standing less than a foot from him as
05 he was cross in front of you?
06 A. No, I didn't notice it.
07 Q. Okay. You didn't ask him what it
08 was that he was carrying?
09 A. No.

140. PAGE 423:13 TO 424:06 (RUNNING 00:00:35.545)

13 Q. You communicated with
14 Mr. Kessler, correct?
15 A. Yes.
16 Q. And you communicated with
17 Mr. Heimbach?
18 A. Yes.
19 Q. Okay. Did you communicate with
20 Mr. Damigo at UTR?
21 A. Yes.
22 Q. Did you see members of Vanguard
23 America at UTR?
24 A. Yes.
25 Q. Did you see members of TWP at
00424:01
02 UTR?
03 A. Yes.
04 Q. Did you see League of the South
05 at UTR?
06 A. Yes.

141. PAGE 424:09 TO 424:12 (RUNNING 00:00:05.716)

09 Q. Okay. And you obviously saw
10 members of the Rise Above Movement at UTR,
11 correct?
12 A. Yes.

142. PAGE 424:16 TO 424:25 (RUNNING 00:00:24.059)

16 Q. And you were a leader on the
17 ground at UTR, correct?
18 A. Yes.
19 Q. And in fact, you have indicated

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20 that you need to be -- you needed to be a
21 frontline commander at UTR, correct?
22 A. Yes.
23 Q. You were yelling out orders at
24 UTR?
25 A. Yes.

143. PAGE 425:12 TO 426:07 (RUNNING 00:01:35.030)

12 MS. PHILLIPS: Thank you, Katie.
13 We just played this exhibit from
14 the first second to the 44th second.
15 For the record, this is Exhibit 79.
16 (Plaintiffs' Exhibit 79,
17 Audio/Video, marked for identification,
18 as of this date.)
19 BY MS. PHILLIPS:
20 Q. And Mr. Kline, do you recognize
21 yourself at the front of that column of
22 individuals --
23 A. Yes.
24 Q. -- marching?
25 And that was Vanguard America,
00426:01
02 correct, members of Vanguard America?
03 A. Yes.
04 Q. That was with the black shields
05 with the white crossed fasces and white
06 shield with the black eagle, correct?
07 A. Yes.

144. PAGE 426:12 TO 426:24 (RUNNING 00:01:10.142)

12 Q. Was that a fair and accurate
13 video taken of part of August 12th, 2017?
14 A. Yes.
15 Q. Okay. And James Field was in
16 that group with Vanguard America, correct?
17 A. I'm not sure if he was in that
18 specific first group or not.
19 Q. Okay.
20 MS. PHILLIPS: So, Katie, let's
21 play the rest of Exhibit 79 from -- if
22 you can jump forward to 1:45, the 1
23 minute, 45 second mark, and then we'll
24 play this to 2 minutes and 11 seconds.

145. PAGE 427:06 TO 428:06 (RUNNING 00:00:38.600)

06 BY MS. PHILLIPS:
07 Q. It's a little blurry because it's
08 in movement, but do you see Mr. Fields
09 there --
10 A. Yes.
11 Q. -- Mr. Kline?
12 A. Yes.
13 Q. Okay. He was walking in that
14 group, correct?
15 That was the same shields that
16 that group of individuals were carrying as
17 earlier in the video, correct?
18 A. Yes.
19 MS. PHILLIPS: And, again, we
20 played that video from the 1 minute, 45
21 second mark to the 2 minute, 11 second
22 mark.
23 BY MS. PHILLIPS:
24 Q. And in the first video, the first

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25 portion of the video that we showed, could
00428:01
02 you hear the chanting "blood and soil"?
03 A. Yes.
04 Q. And this group chanted, "You will
05 not replace us," correct?
06 A. Yes.

146. PAGE 428:22 TO 429:13 (RUNNING 00:00:24.199)

22 (Plaintiffs' Exhibit 80, Photo,
23 marked for identification, as of this
24 date.)
25 BY MS. PHILLIPS:
00429:01
02 Q. Mr. Kline, do you recognize
03 yourself on the telephone --
04 A. Yes.
05 Q. -- on the forefront of the
06 picture?
07 A. Yes.
08 Q. Do you recognize Mr. Fields
09 slightly to your right in the picture? He
10 is wearing khakis and holding up Vanguard
11 America shield.
12 Do you see that?
13 A. Yes, I see him in the background.

147. PAGE 430:10 TO 430:15 (RUNNING 00:00:16.399)

10 Q. Okay. Is that a speck of blood
11 on your shirt there?
12 A. I'm not sure. Probably, though.
13 Q. And is this a photo a fair and
14 accurate representation of August 12th?
15 A. Yes.

148. PAGE 430:19 TO 431:22 (RUNNING 00:00:52.403)

19 (Plaintiffs' Exhibit 81, Chat
20 record with Antifa Cat Lady,
21 Bates-stamped EK00002237, marked for
22 identification, as of this date.)
23 BY MS. PHILLIPS:
24 Q. Okay. These are text messages
25 between you and that Antifa Cat Lady, 571
00431:01
02 number?
03 A. Yes.
04 Q. And this is a text message from
05 December 24, 2017.
06 Do you see that?
07 A. Yes.
08 Q. And you say "Fields was from DS
09 forums."
10 Do you see that?
11 A. Yeah.
12 Q. Does that refresh your
13 recollection that Mr. Fields participated
14 in the Daily Stormer forums?
15 A. I'm not sure. I'm not sure what
16 this is in reference to with this person,
17 but, I mean, this is well after the fact.
18 So maybe. Maybe I found that out, but I
19 don't remember. Maybe I found that out
20 later that he was a Daily Stormer forum
21 person, but I don't remember how I got that
22 information or anything like that.

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149. PAGE 448:23 TO 449:07 (RUNNING 00:01:00.993)

23 MS. PHILLIPS: Katie, please pull
24 up Tab 254, please. We will mark this
25 as an exhibit. And I'd like to play at
00449:01
02 the 2 minute mark -- 2 minute, 10
03 second mark, excuse me.
04 (Video playing at this time.)
05 MS. PHILLIPS: Katie, I want to
06 play this to the 2 minute, 39 second
07 mark, please.

150. PAGE 449:10 TO 449:25 (RUNNING 00:00:25.721)

10 Q. Mr. Kline, do you recognize
11 yourself in that video?
12 A. Yes.
13 Q. And that video is from Unite the
14 Right, correct?
15 A. Yes.
16 Q. And you were speaking with
17 Mr. Matt Heimbach there, correct?
18 A. Yes.
19 Q. And we played that video from the
20 2 minute mark, 10 seconds to the 2 minute,
21 39 seconds.
22 Is that a fair and accurate
23 representation of a portion of the events
24 from August 12th, 2017?
25 A. Yes.

151. PAGE 450:13 TO 450:17 (RUNNING 00:00:01.721)

13 (Plaintiffs' Exhibit 82,
14 Audio/Video, marked for identification,
15 as of this date.)
16 MS. PHILLIPS: Okay. That was
17 Exhibit 82 for the record.

152. PAGE 450:19 TO 451:15 (RUNNING 00:00:56.437)

19 (Plaintiffs' Exhibit 83,
20 Audio/Video, marked for identification,
21 as of this date.)
22 MS. PHILLIPS: This is another
23 video. This will be marked as
24 Exhibit 83.
00451:01
25 Katie, on this, I would like to
02 play the 9 minute mark to the 9 minute,
03 18 second mark.
04 (Video playing at this time.)
05 BY MS. PHILLIPS:
06 Q. Okay. Mr. Kline, do you
07 recognize yourself in that video?
08 A. Yes.
09 Q. Okay. This is in McIntire Park,
10 correct?
11 A. Yes.
12 Q. And is that a fair and accurate
13 representation of a portion of August 12th,
14 2017?
15 A. Yes.

153. PAGE 454:14 TO 455:02 (RUNNING 00:00:26.319)

14 Q. Okay. So you agree that at some
15 point, you believed that it was an overall

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16 victory, UTR?
17 A. Yes.
18 Q. Is that correct?
19 Okay. And Mr. Damigo praised you
20 for your efforts in organizing UTR,
21 correct?
22 A. Yes.
23 Q. In the wake of UTR, you thought
24 it was important to shut down the Discord,
25 correct?
00455:01
02 A. Yes.

154. PAGE 455:17 TO 456:13 (RUNNING 00:00:58.391)

17 Q. Okay. And in the subsequent days
18 after UTR, you took over as the CEO of
19 Identity Evropa, correct?
20 A. In name, yes, but actually owning
21 the organization or having CEO title, like,
22 legally, no, I was not the legal CEO.
23 Q. Okay. But you were in that role
24 until November of 2017, correct?
25 A. Yes.
00456:01
02 Q. Okay. And then Mr. Damigo asked
03 you to leave the organization; is that
04 correct?
05 A. Yes.
06 Q. Why did he ask you to leave the
07 organization?
08 A. Him and I had disagreements over
09 the direction that he wanted to go with
10 everything. And he wanted to give Patrick
11 Casey the CEO title over me.
12 Q. Did he tell you why --
13 A. He refused to tell me why.

TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 01:25:37.605)