#### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA MONROE DIVISION

STATE OF MISSOURI ex rel. ERIC S. SCHMITT, Attorney General, and

STATE OF LOUISIANA ex rel. JEFFREY M. LANDRY, Attorney General,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official capacity as President of the United States, *et al.*;

Defendants.

Case No. 3:22-cy-01213

#### **DECLARATION OF JIM HOFT**

- 1. My name is Jim Hoft. I am over the age of 18 years and competent to testify about the matters discussed herein.
- 2. I am the founder, owner, and operator of the popular news website The Gateway Pundit ("GP"), gatewaypundit.com. I reside in St. Louis, Missouri, and operate the website from there. The "Gateway" refers to St. Louis's Gateway Arch. Since its founding in 2004, the Gateway Pundit has grown from a one-man blog to one of the internet's largest destinations for conservative news and commentary. In 2021, The Gateway Pundit was ranked fourth on a list of top ten conservative news websites, ranked by monthly web searches, with over 2 million searches per month.
- 3. In connection with The Gateway Pundit, I maintain and operate The Gateway Pundit's social-media accounts, including accounts with Twitter (which has been permanently suspended), Facebook, YouTube, and Instagram. These accounts have or had hundreds of thousands of

followers. In particular, GP's Twitter account had over 400,000 followers before it was suspended. GP's Facebook account has over 650,000 followers. GP's Instagram account has over 205,000 followers. GP's YouTube account has over 98,000 followers. Because I am based in Missouri, I know that many of these followers include many residents of Missouri. Based on the large numbers of followers and the nationwide prominence of GP, I am certain that they include large numbers of residents of Louisiana as well.

- 4. GP's social media accounts have experienced censorship on all major social-media platforms, including its speech regarding COVID-19 issues and election security. In many instances, we have noticed that this censorship has followed and reflected the calls for censorship from federal government officials, including in the Biden Administration.
- 5. For example, the current Administration has repeatedly called for censorship of social-media speech regarding election integrity and so-called "COVID-19 misinformation." GP has experienced significant social-media censorship regarding its speech on both of those issues, including on Twitter, Facebook, and YouTube.
- 6. **Twitter.** On or about January 2, 2021, Twitter suspended GP's Twitter account (@gatewaypundit) after it posted a tweet that stated, "Then It's Not a Vaccine: Crazy Dr. Fauci Says Early COVID Vaccines Will Only Prevent Symptoms and NOT Block the Infection ... What? Via @gatewaypundit."
- 7. On or about January 29, 2021, Twitter suspended GP's Twitter account again after it posted a tweet that stated, "Five Days After Biden Inauguration, Judge Rules Late Changes To VA

statement-vaccines/) (last accessed May 31, 2022)

<sup>&</sup>lt;sup>1</sup> Discussed more fully at Jim Hoft, "Gateway Pundit Suspended on Twitter for 12 Hours for Posting on Dr. Fauci's Crazy Statement on Vaccines." Gateway Pundit, (Janaury 2, 2021) (<a href="https://www.thegatewaypundit.com/2021/01/gateway-pundit-suspended-twitter-12-hours-posting-dr-faucis-crazy-pundit-suspended-twitter-pundit-

Election Law That Allowed Late Mail-In Ballots Without Postmark To Be Counted is ILLEGAL @100percFEDUP via @gatewaypundit."<sup>2</sup>

- 8. On or around February 6, 2021, GP's Twitter account was permanently banned after it posted video footage from security cameras in the TCF Center in Detroit from Election Night 2020 that showed two deliveries of vans driving to the building around 3:30 am in the morning bringing shipments of first more than 50 boxes, and then, roughly one hour later, more boxes of ballots.<sup>3</sup> In connection with this video, GP tweeted "Just an FYI The fake news media and others challenged our TCF Center video report from Friday. That was a bad move. We have much more coming!" Promptly after this tweet, GP's Twitter account was permanently suspended, preventing us from tweeting the additional content to our 400,000+ followers.
- 9. On or about August 29, 2020, my brother, Joe Hoft, who blogs for GP, tweeted (@joehoft) a series of posts indicating that COVID-19 deaths are over-counted because the counts include deaths of people who died *with* COVID-19, not just those who died *because of* COVID-19. Dr. Fauci, among others, has subsequently acknowledged the truth of this assertion. These tweets went viral and were heavily re-tweeted, including by President Trump. By my recollection, as a result of these tweets, Twitter partially censored @joehoft by posting public advisories within his tweet, "warning" the public that the tweet was misinformation.

<sup>&</sup>lt;sup>2</sup> Discussed more fully at Jim Hoft, "Twitter Suspends Gateway Pundit for Posting Virginia Court Ruling on Virginia Mail-in Ballots – Claims the Court Ruling Incites Violence!" Gateway Pundit (January 29, 2021) (<a href="https://www.thegatewaypundit.com/2021/01/twitter-suspends-gateway-pundit-account-posting-virginia-court-ruling-virginia-mail-ballots-claims-court-ruling-incites-violence/">https://www.thegatewaypundit.com/2021/01/twitter-suspends-gateway-pundit-account-posting-virginia-court-ruling-virginia-mail-ballots-claims-court-ruling-incites-violence/</a>) (last accessed May 31, 2022).

<sup>&</sup>lt;sup>3</sup> See Jim Hoft, "Breaking: Twitter Indefinitely Suspends Gateway Pundit Account After We Announce More Video of TCF Center Fraud Will Be Released in Coming Days." Gateway Pundit (February 6, 2021) (<a href="https://www.thegatewaypundit.com/2021/02/gateway-pundit-suspended-twitter-announcing-video-tcf-center-fraud-will-released-coming-days/">https://www.thegatewaypundit.com/2021/02/gateway-pundit-suspended-twitter-announcing-video-tcf-center-fraud-will-released-coming-days/</a>) (last accessed May 31, 2022), see also Jim Hoft, "Exclusive: The TCF Center Election Fraud – Newly Discovered Video Shows Late Night Deliveries of Tens of Thousands of Illegal Ballots 8 Hours After Deadline." Gateway Pundit (February 5, 2021) (<a href="https://www.thegatewaypundit.com/2021/02/exclusive-tcf-center-election-fraud-newly-recovered-video-shows-late-night-deliveries-tens-thousands-illegal-ballots-michigan-arena/</a>) (last accessed May 31, 2022).

- 10. On or about December 31, 2020, my brother, Joe Hoft, who blogs for GP, tweeted (@joehoft) tweeted content related to Hunter Biden's laptop, stating "Where's Hunter? How is Hunter Biden Celebrating the New Year? New Photos of Hunter Biden Pushing Drugs on Women Emerge via @gatewaypundit [link<sup>4</sup>]" Twitter suspended the account on the ground that he "Violat[ed] our rules against posting or sharing privately produced/ distributed intimate media of someone without their express consent."
- 11. **Facebook.** During 2020 and 2021, we experienced repeated instances of censorship by Facebook, including our content related to COVID-19 and election security. Facebook frequently imposed warning labels and other restrictions on our content, particularly content related to election integrity and COVID-19. Facebook's censorship was so aggressive that I was forced to hire an assistant to monitor and address censorship on Facebook.
  - 12. Specific examples of such censorship by Facebook include the following articles:
    - a. Joe Hoft, "Shock Report: This Week CDC Quietly Updated COVID-19 Numbers

       Only 9,210 Americans Died From COVID-19 Alone Rest Had Different Other
       Serious Illnesses." <a href="https://www.thegatewaypundit.com/2020/08/shock-report-week-cdc-quietly-updated-covid-19-numbers-9210-americans-died-covid-19-alone-rest-serious-">https://www.thegatewaypundit.com/2020/08/shock-report-week-cdc-quietly-updated-covid-19-numbers-9210-americans-died-covid-19-alone-rest-serious-</a>

<u>illnesses/?utm\_source=Twitter&utm\_medium=PostTopSharingB</u> (published Aug. 29, 2020) (last accessed May 31, 2022).

<sup>&</sup>lt;sup>4</sup> Joe Hoft, "Where's Hunter? How is Hunter Biden Celebrating the New Year? New Photos Emerge of Hunter Biden Pushing Drugs on Women." Gateway Pundit (December 31, 2020) (<a href="https://www.thegatewaypundit.com/2020/12/hunter-hunter-biden-celebrating-new-year-new-photos-hunter-biden-pushing-drugs-women-emerge/">https://www.thegatewaypundit.com/2020/12/hunter-hunter-biden-celebrating-new-year-new-photos-hunter-biden-pushing-drugs-women-emerge/</a>) (last accessed May 31, 2022).

<sup>&</sup>lt;sup>5</sup> Discussed more fully at Joe Hoft, "Twitter Suspends TGP's Joe Hoft After Sharing FACTUAL REPORT on Hunter Biden's Serial Sex and Crack Escapades." Gateway Pundit (January 4, 2021) (<a href="https://www.thegatewaypundit.com/2021/01/twitter-suspends-tgps-joe-hoft-sharing-factual-report-hunter-bidens-serial-sex-crack-escapades/">https://www.thegatewaypundit.com/2021/01/twitter-suspends-tgps-joe-hoft-sharing-factual-report-hunter-bidens-serial-sex-crack-escapades/</a>) (last accessed May 31, 2022).

- b. Joe Hoft, "This is Fraud: 10% of Reported COVID-19 Deaths for Those Under 35 as Reported by the CDC Are Due to Poisoning, Trauma and Unintentional Injuries." <a href="https://www.thegatewaypundit.com/2020/09/fraud-10-reported-covid-19-deaths-35-reported-cdc-due-poisoning-trauma-unintentional-injuries/">https://www.thegatewaypundit.com/2020/09/fraud-10-reported-covid-19-deaths-35-reported-cdc-due-poisoning-trauma-unintentional-injuries/</a> (published Sept. 3, 2020) (last accessed May 31, 2022)
- c. See also Exhibits 1-6.
- 13. While Facebook sometimes bans our content altogether, they also rely upon a cadre of "third party" "fact check" entities hired by Facebook to declare our articles mis or disinformation. Facebook then relies upon this content to issue advisories to the public that our content is false and dangerous, and that it comes from a disreputable website. Facebook also encourages (or otherwise outright prohibits) the public from sharing our content with their social networks.
- 14. **YouTube.** We have also experienced censorship on other platforms. For example, on or about May 14, 2022, we received a strike on YouTube, and YouTube removed a video we had posted. The video in question was an interview with Idaho Lieutenant Governor and gubernatorial candidate Janice McGeachin, which we conducted in connection with the Idaho primary election for Governor. In the video, Lt. Gov. McGeachin discussed the problem of election fraud and raised questions about the outcome of the 2020 Presidential election, including money Idaho illegally received from Mark Zuckerberg and other problems relating to voter fraud. YouTube promptly removed the video and issued a strike against our account.
- 15. The social-media platforms have extended their censorship policies to our followers as well. We have received numerous reports from followers that they have received temporary suspensions or other adverse actions from social-media platforms (such as seven-day suspensions

of their Facebook accounts) for re-posting or amplifying our content. This chills our followers from re-posting, re-tweeting, or otherwise amplifying our content. The risk of being locked out of Facebook for seven days, or suffering other forms of censorship, deters our followers from amplifying our content on social media platforms, which reduces the reach of our message.

- 16. These social-media censorship policies chill GP's freedom of expression on social media platforms as well. To avoid suspension and other forms of censorship, we frequently avoid posting content that we would otherwise post on social-media platforms, and we frequently alter content to make it less likely to trigger censorship policies.
- 17. Based on my close observation of the patterns of censorship of GP's social-media accounts and related accounts in recent years, I have strong reason to infer that federal government officials are directly involved in the censorship of our speech and content.
- 18. For example, it is clear that Democratic public officials and the Biden Administration coordinate with the Center for Countering Digital Hate (CCDH), a left-wing 501(c)(3) group dedicated to censorship of free speech on the internet. In the summer of 2021, White House press secretary Jen Psaki successfully called for the censorship on social-media platforms of the so-called "disinformation dozen," whom the White House accused of spreading COVID-related "disinformation" on social media. Psaki received this information from CCDH, which had previously identified the so-called "disinformation dozen" and called for their expulsion from social media.
- 19. In the same time frame, CCDH targeted The Gateway Pundit in coordination with federal officials. CCDH pushed for The Gateway Pundit's demonetization by Google, accusing GP of spreading "misinformation" about COVID-19 and election security—the same topics targeted by the Biden Administration. CCDH coordinated with Democratic Senator Amy Klobuchar to

pressure for this demonetization, boasting on its website that she had personally written to Google

CEO Sundar Pichai about demonetizing GP, and it is likely that CCDH engaged in similar

coordination with the Biden Administration once it was in office. This pressure campaign by

federal official(s) and CCDH was successful. In September 2021—the same time frame that

CCDH worked with federal officials to expel the "disinformation dozen" from social media—

CCDH sent an email to its supporters boasting that it had succeeded in demonetizing GP on

Google. CCDH accused GP of "promoting dangerous nonsense about the 2020 US Presidential

election and Covid 19," i.e., parroting the same calls for censorship on the same topics pushed by

federal elected officials and senior officials in the Biden Administration.

20. Additionally, the Department of Homeland Security has specifically identified social

media disinformation questioning the mainstream narrative regarding COVID-19 vaccination and

the integrity of the 2020 general election as domestic terrorism and threats to national security.<sup>6</sup>

DHS famously created, then temporarily paused the creation of a governmental "Disinformation

Governance Board." DHS then hired former DHS Secretary Michael Chertoff (whose non-profit,

Alliance for Securing Democracy lists The Gateway Pundit as Russian disinformation<sup>7</sup>) to reboot

and rehabilitate the Board.

I swear or affirm under penalty of perjury that the foregoing is true and correct.

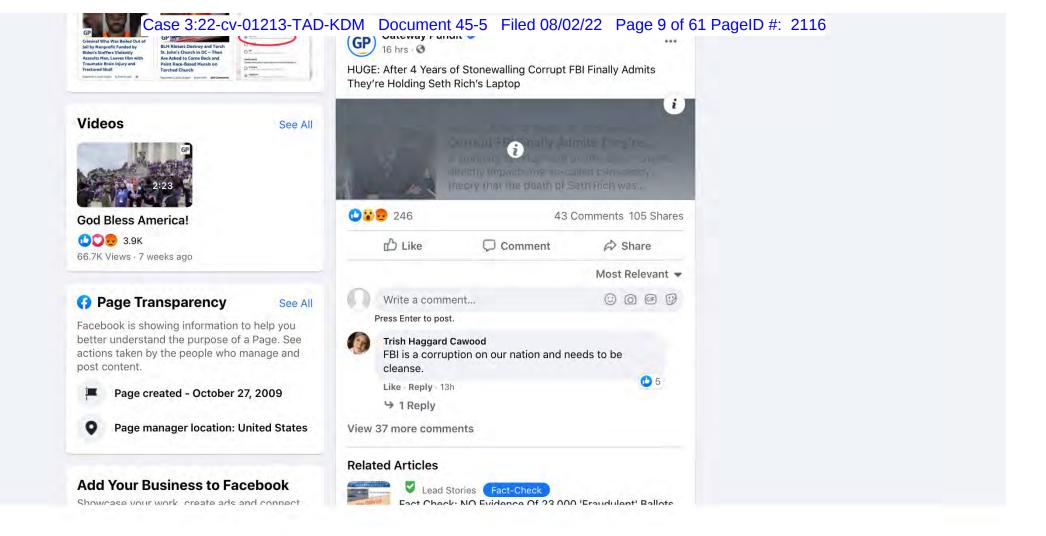
Dated: \_\_\_\_\_6/6/2022 \_\_\_\_\_ Signed: /s/ Jim Hoft

<sup>6</sup> See Exhibit 7 - National Terrorism Advisory System Bulletin; Department of Homeland Security (Feb. 7, 2022) (https://www.dhs.gov/sites/default/files/ntas/alerts/22\_0207\_ntas-bulletin.pdf) (last accessed May 31, 2022).

<sup>7</sup> See Jim Hoft, "MORE LIES: Left-Wing Smear Machine Lists Gateway Pundit as Top Russian Propaganda Website." Gateway Pundit (August 6, 2017) (https://www.thegatewaypundit.com/2017/08/liesleft-wing-smear-machine-lists-gateway-pundit-top-russia-propaganda-website/) (last accessed May 31, 2022).

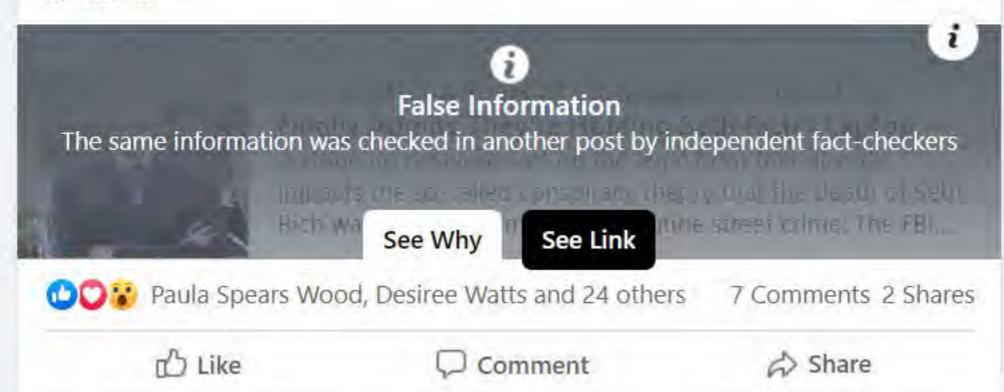
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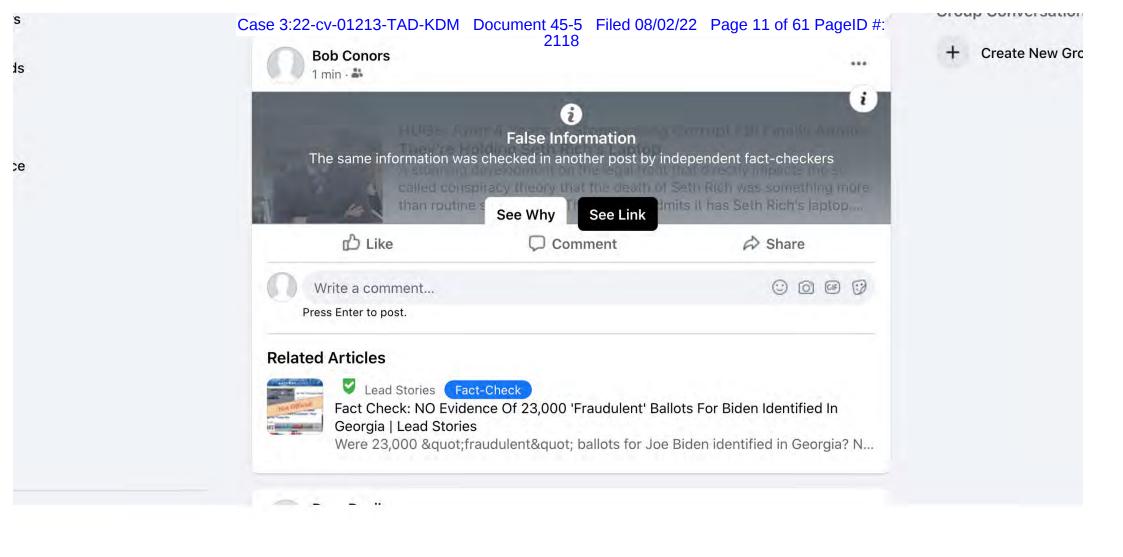
## EXHIBIT 1

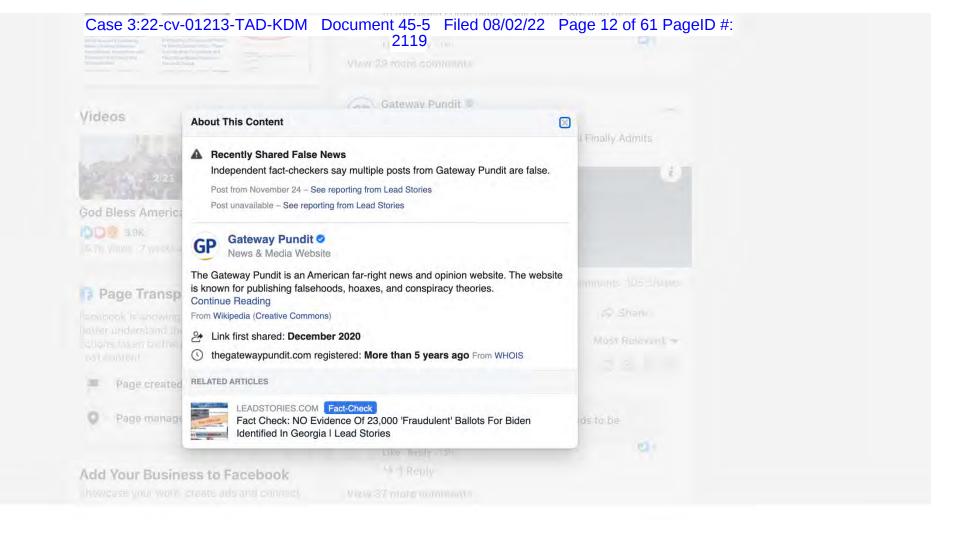




Ka-boom!

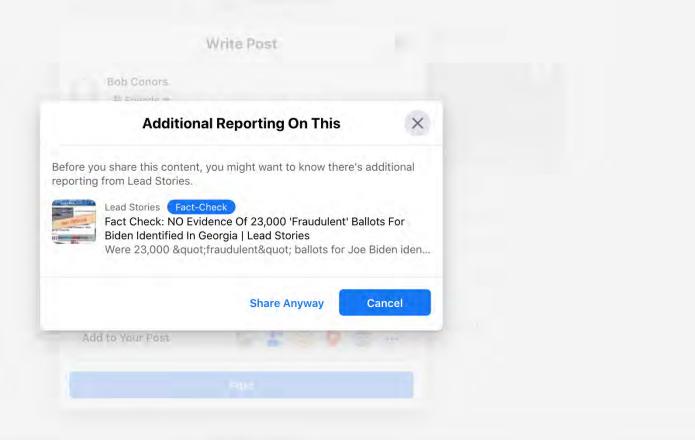






## EXHIBIT 2

### Case 3:22-cv-01213-TAD-KDM Document 45-5 Filed 08/02/22 Page 14 of 61 PageID #: 2121



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### Fact Check: NO Evidence Of 23,000 'Fraudulent' Ballots For Biden Identified In Georgia



Were 23,000 "fraudulent" ballots for Joe Biden identified in Georgia? No, there's no evidence that's true. An article making that claim cites as its source a video on YouTube, which relies on unofficial results reported in real time. State election officials have repeatedly defended the integrity of the vote. "We have now counted legally cast ballots three times, and the results remain unchanged," said Georgia Secretary of State Brad Raffensperger.

The claim appeared in an article (archived here) published by The Gateway Pundit on December 4, 2020. It opened:

79 Tonight a batch of 23,000 Biden-only ballots have been identified and determined to be fraudulent - removing these fraudulent ballots will give Georgia to President Trump.

Users on social media saw this:

Fact Check

⑤ Dec 8, 2020 

# by: Dana Ford



The article continued

A video has surfaced showing a batch of 23,000 ballots all for Biden that were reported in Georgia - a state where the media says Biden is leading by 10,000 votes.

That video can be seen here:



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Fact Check: GOP Observers Did NOT Swear In Affidavits They Were Told To Leave Fulton County, Georgia, Vote Count Center On Election Night ① Dec 5, 2020 # by: Alan Duke



Fact Check: A School Bus Found In Buckeye, Arizona Was NOT Full Of Missing Voting Machines

① Dec 6, 2020 # by: Sarah Thompson



Fact Check: A COVID-19 Vaccine Is NOT Likely To Kill You

1 Dec 4, 2020 # by: Victoria Eavis



Fact Check: Indiana Woman Was NOT Charged With Delivering Fraudulent Ballots

🕕 Jul 21, 2020 🦸 by: Victoria Eavis



Fact Check: Video From Georgia Does NOT Show Suitcases Filled With Ballots Suspiciously Pulled From Under A Table; Poll Watchers Were NOT Told To

① Dec 3, 2020 # by: Alan Duke.

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Fact Check: GoFundMe CEO Did NOT Say 'I Run A Website That Hosts Popularity Contests Where If You Lose, You Die'

1 Dec 9, 2020 # by: Dana Ford



Fact Check: Georgia State Senator Elena Parent Was NOT Busted Counting Ballots In Pennsylvania

### Case 3:22-cv-01213-TAD-KDM Document 45-5 Filed 08/02/22 Page 17 of 61 PageID #:



Although the article made a number of allegations, this fact-check is limited to the specific claim about the 23,000 "fraudulent" Biden ballots. The article's source for that claim is the above-mentioned video.

What's Important to note about that video is that it relies on unofficial election data reported in real time on The New York Times website. They're not official results.

Here's how the Cybersecurity and Infrastructure Security Agency explains the difference between official and unofficial results:

Election results reported on election night are always unofficial and are provided solely for voters' convenience. In fact, no state requires that official results be certified on election night itself. Fluctuations in unofficial results reporting will occur during and after election night as more ballots are processed and counted, often including military and overseas ballots, and validated provisional ballots. Variations in state processes may also mean ballots cast through different methods (e.g., early in-person voting, mail-in voting, and election day voting) are counted and unofficially reported in different orders.

Official results are released after rigorous canvassing (verification) and certification by local and state election officials.

In other words, unofficial election results may contain irregularities or errors that are later explained or corrected. In Antrim County, Milchigan, for example, a clerk did not update software, which led to the <u>erroneous reporting of unofficial results</u>. The mistake did not impact vote totals.

Lead Stories has written about election data scraped from The New York Times website before. Read that story here.

We reached out to the office of Georgia's secretary of state to ask about the 23,000 claim of "fraudulent" votes and will update this story, as necessary, if we receive a response.

On December 7, 2020, Raffensperger, a Republican, recertified the results of the presidential election. He did so after recounts, including a hand recount, upheld the original outcome of the vote. Raffensperger told reporters:

We have now counted legally cast ballots three times, and the results remain unchanged

Biden beat Donald Trump in Georgia by some 12,000 votes. Raffensperger added:

I know there are people that are convinced the election was fraught with problems, but the evidence — the actual evidence, the facts — tell us a different story.

He spoke the same day a <u>federal judge dismissed a lawsulf</u>, filed by former Donald Trump attorney Sidney Powell, that sought to overturn the state's election results.

Lead Stories has covered voter fraud claims in Georgia before, as can be seen here.

NewsGuard, a company that uses trained journalist to rank the reliability of websites, describes thegatewaypundit.com as:

7.9 A partisan conservative website that regularly publishes hoaxes, conspiracy theories, and unsubstantiated claims, including those related to the COVID-19 pandemic.

According to NewsGuard the site does not maintain basic standards of accuracy and accountability. Read their full assessment here.

Want to inform others about the accuracy of this story?

https://leadstories.com/hoax-alert/2020/12/fact-check-no-evidence-of-23000-fraudulent-ballots-for-biden-identified-in-georgi...

Click this link to copy it to your clipboard

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This fact check is available at IFCN's 2020 US Elections #Chatbot on WhatsApp. Click here, for more.



Dana Ford is an Atlanta-based reporter and editor. She previously worked as a senior editor at Atlanta Magazine Custom Media and as a writer/ editor for CNN Digital. Ford has



Joined Texas AG's Suit Asking Supreme Court To Overturn Other States' Election Results

🖸 Dec 9, 2020 🦸 by: Victoria Eavis



Fact Check: 'Actual Results Of The Election' Do NOT Show Donald Trump With More Electoral College Votes Than Joe Biden

Dec 9, 2020 # by: Olivera Perkins



Fact Check: The Supreme Gourt Did NOT Vote 6-3 To Take Up Texas AG's Lawsuit Over Election, NOR Did Tennessee Join

1 Dec 9, 2020 # by: Alexis Tereszcuk



Fact Check: COVID-19 RNA Vaccine Will NOT Change Your DNA

1 Dec 8, 2020 # by: Olivera Perkins



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## Case 3:22-cv-01213-TAD-KDM Document 45-5 Filed 08/02/22 Page 18 of 61 PageID #:

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## EXHIBIT 3



Case 3:22-cv-01213-TAD-KDM Document 45-5 Filed 08/02/22 Page 21 of 61 PageID #: 2128 TOAILY A Missing Context. Independent fact-checkers say this information could mislead people. Videos See All See Why 158 Comments 1.1K Shares Like Comment . Share God Bless America! (D) 3.9K Most Relevant \* 64.5K Views - 5 weeks ago 0000 Write a comment... Press Enter to post. Page Transparency See All Jack Goforth Patsy Goforth Facebook is showing information to help you I hope the people who reads this article, will still be better understand the purpose of a Page. See careful. It's no fun getting sick. actions taken by the people who manage and 01 post content. Like Reply 12w Edited → 5 Replies Page created - October 27, 2009 View more comments 1 of 90 Page manager location: United States **Related Articles** SA TODAY Fact-Check Fact check: CDC's data on COVID-19 deaths used Add Your Business to Facebook incorrectly in misleading claims Showcase your work, create ads and connect Updated comorbidity data from the CDC is being used t... with customers or supporters.

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More Facebook @ 2020

Science Feedback Fact-Check

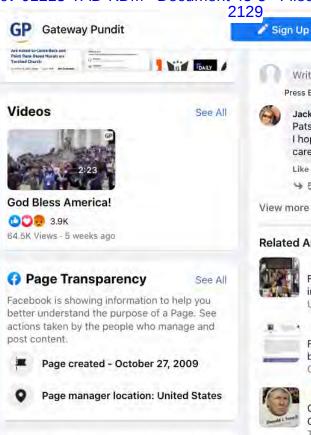
False: Way more than 9,000 Americans have died because of COVID-19. Excess deaths in the U.S. in 202... Cause of death is defined as a medical condition that tri...

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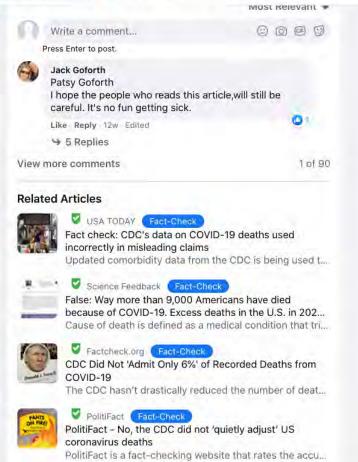


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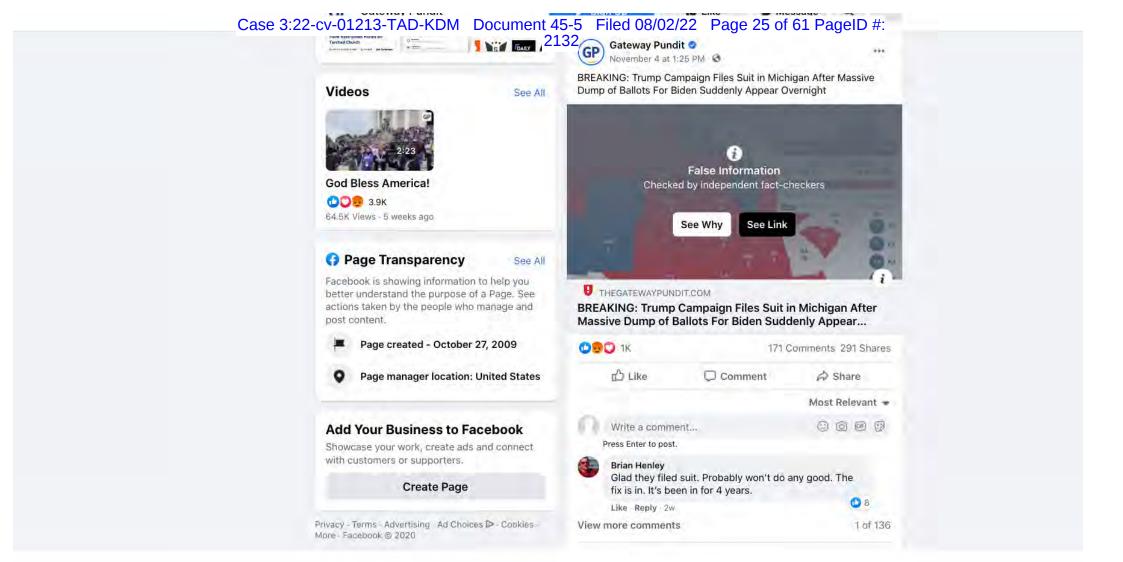
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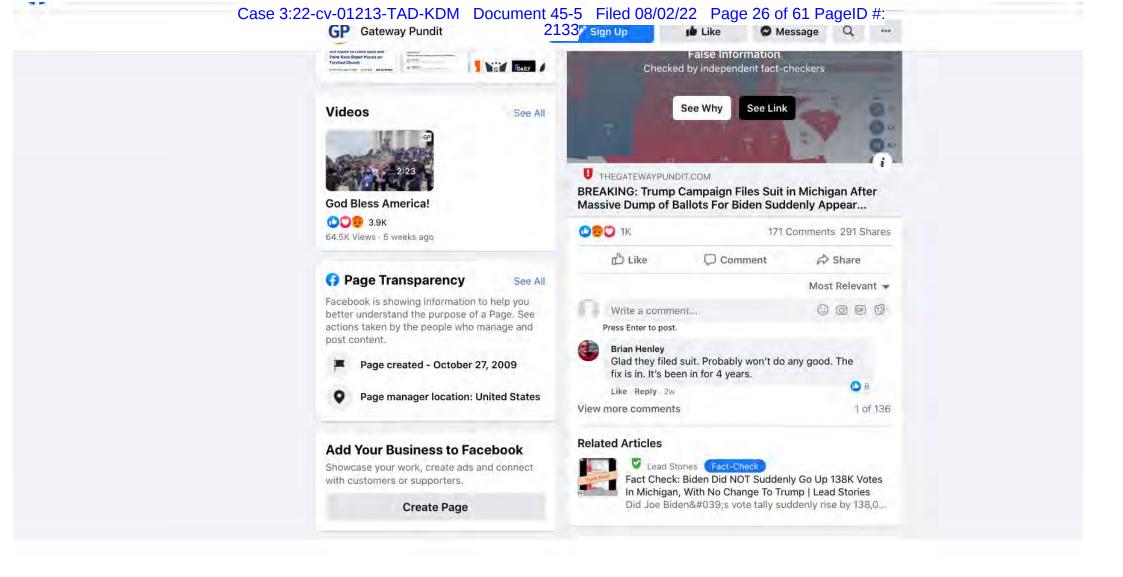
Create Page



#### Case 3:22-cv-01213-TAD-KDM Document 45-5 Filed 08/02/22 Page 23 of 61 PageID #: 2130 **Missing Context** From Independent Fact-Checkers USA TODAY Fact-Check Fact check: CDC's data on COVID-19 deaths used incorrectly in misleading claims Science Feedback Fact-Check False: Way more than 9,000 Americans have died because of COVID-19. Excess deaths in the U.S. in 2020 are at least... Photos Factcheck.org Fact-Check CDC Did Not 'Admit Only 6%' of Recorded Deaths from COVID-19 PolitiFact Fact-Check PolitiFact - No, the CDC did not 'quietly adjust' US coronavirus **About This Notice** Independent fact-checkers say this information is missing context and could mislead people. Learn more about how Facebook works with independent factcheckers to stop the spread of false information. Videos

## EXHIBIT 4





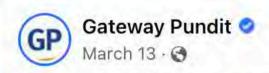
## EXHIBIT 5

AFP United Case 3:22-cv-01213-TAD-KDM Document 45-5 Filed 08/02/22 Page 28 of 61 PageID #: 2135

#### Article misrepresents US report on domestic extremism

An online article claims the US Department of Homeland Security will target anyone who believes the 2020 presidential election was fraudulent or raises doubts about Covid-19 guidance. This is misleading; the report on domestic...





The new guidelines on extremist behavior include those who question the fraud in the 2020 election and anyone who question the regime's talking points on COVID and its treatments including the mandates.



THEGATEWAYPUNDIT.COM

Mayorkas Releases New Rules on Extremism - DHS Will Target Anyone Who Believes Election Was Stolen or Who Challenged Fauci's Everchanging COVID...

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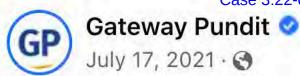
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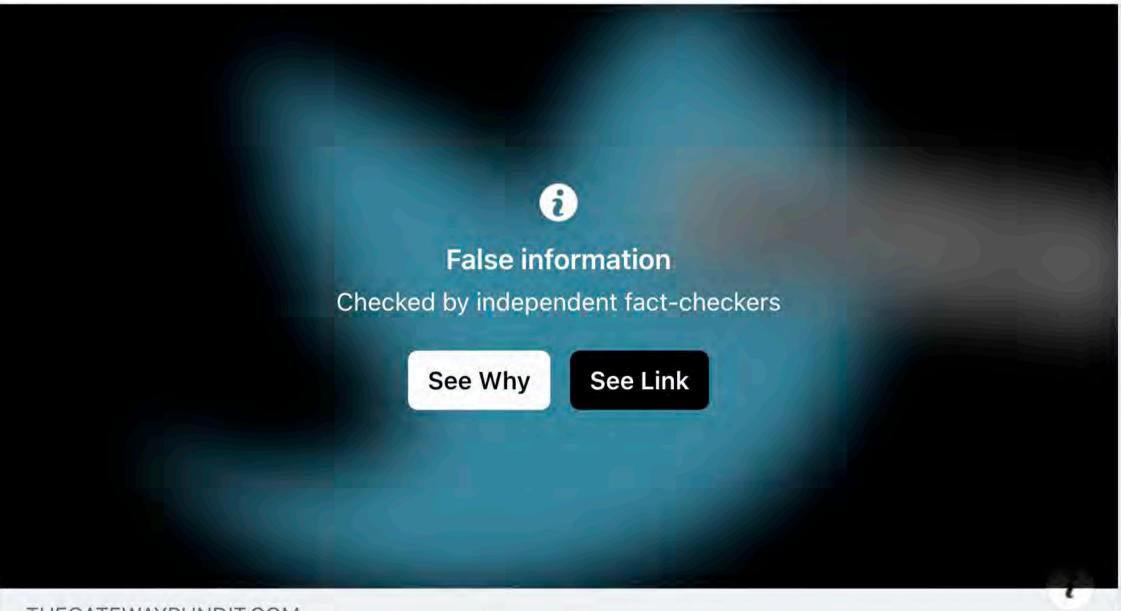
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- Learn more about how Facebook works with independent factcheckers to stop the spread of false information.

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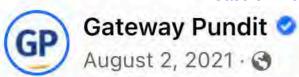
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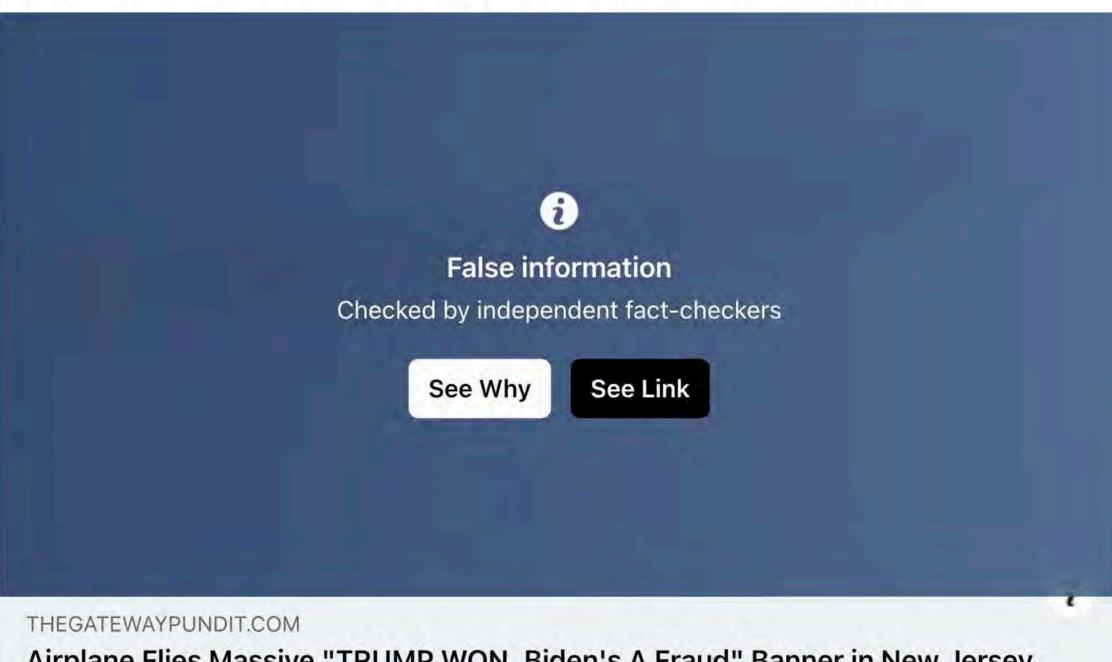
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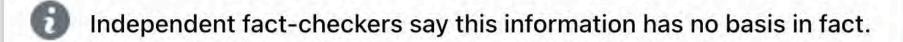
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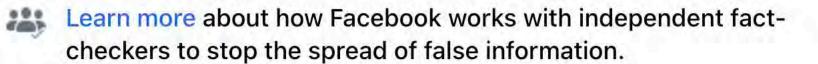


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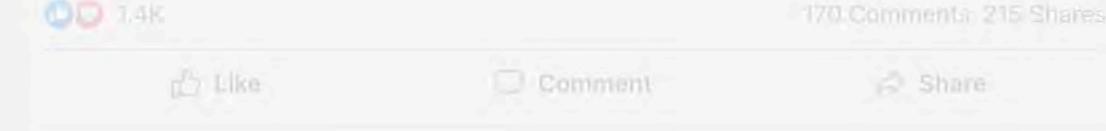
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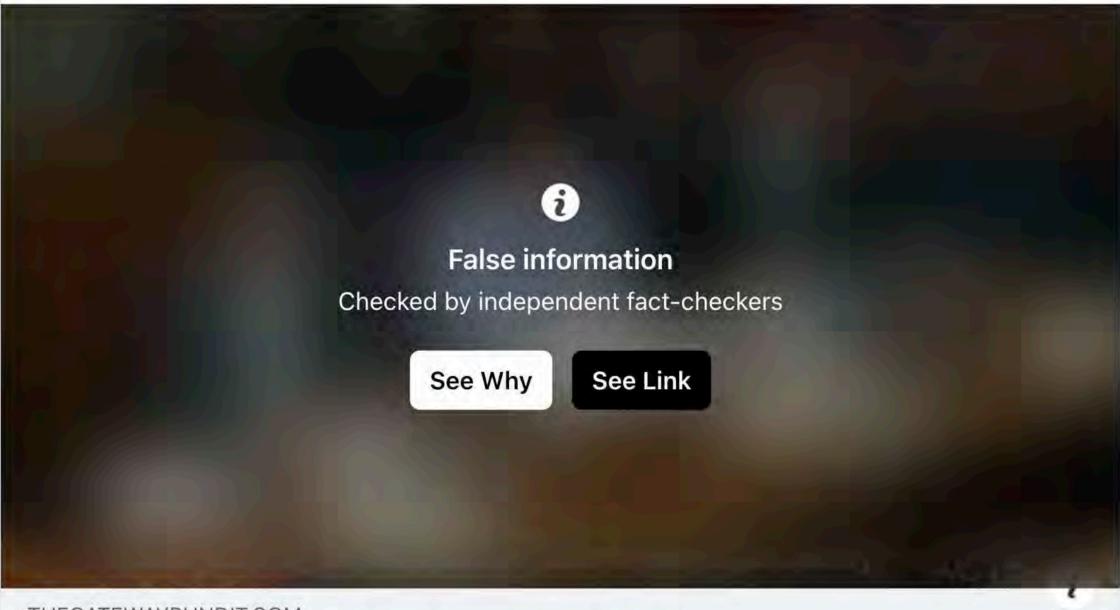
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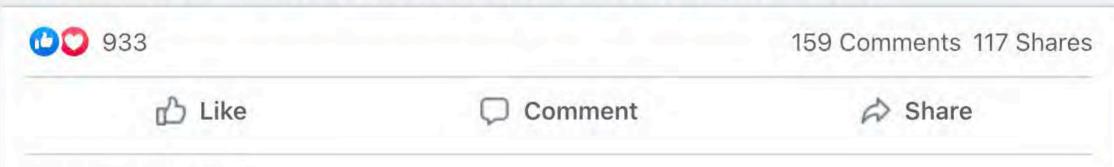


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# **False**

July 17, 2021 3



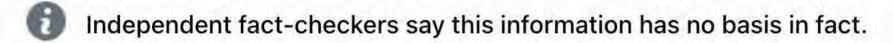
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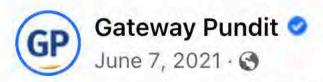
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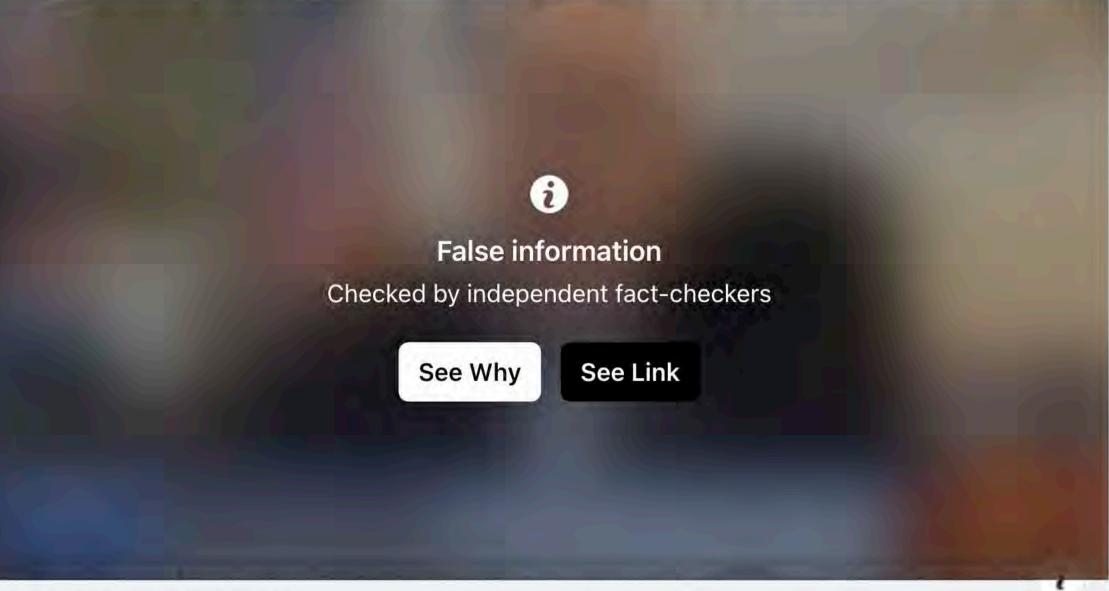
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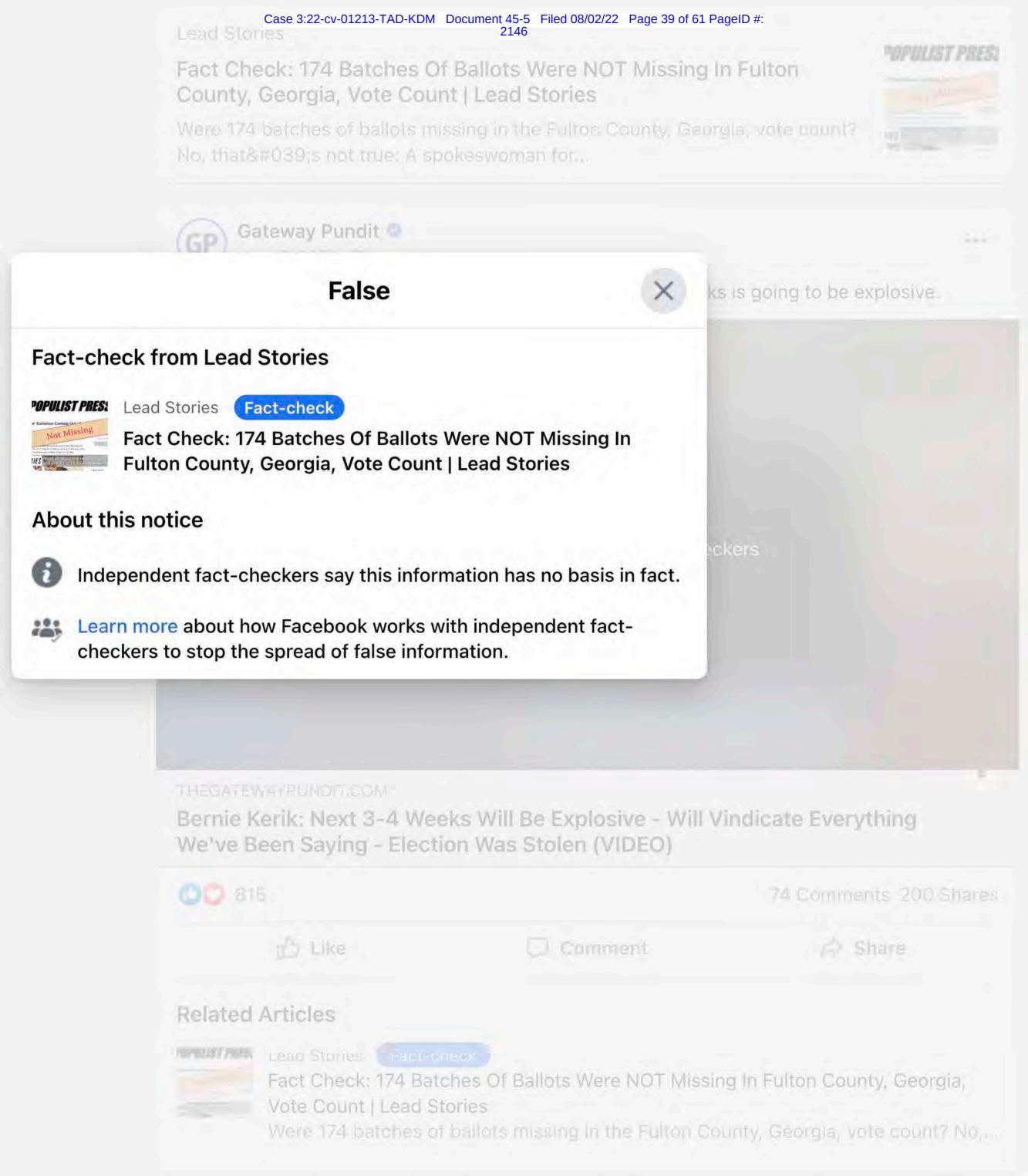


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April 22 - 3

After getting fully vaccinated and boosted, Stephen Colbert announced that he tested positive for COVID-19 on Thursday.



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Stephen Colbert Tests Positive For COVID, Says He's 'Grateful To be Vaxxed And Boosted'



Visit the COVID-19 Information Center for vaccine resources. **Get Vaccine Info** 





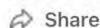
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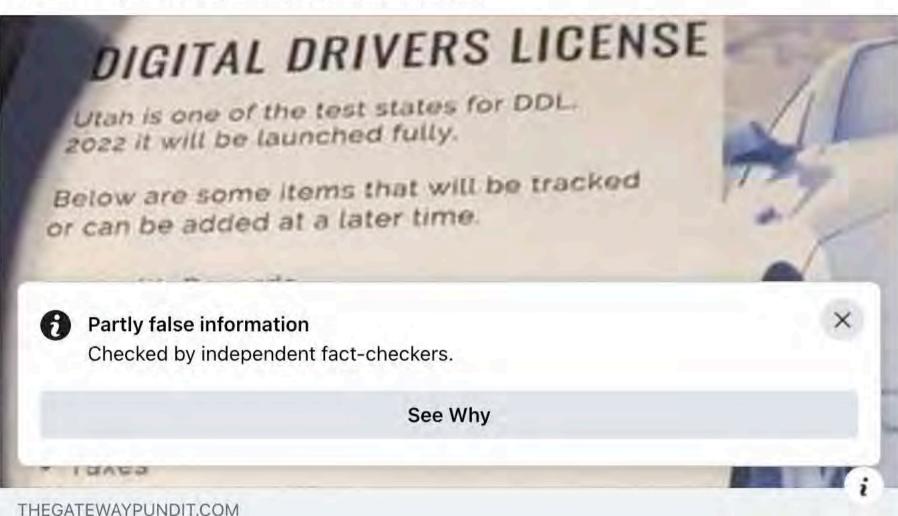




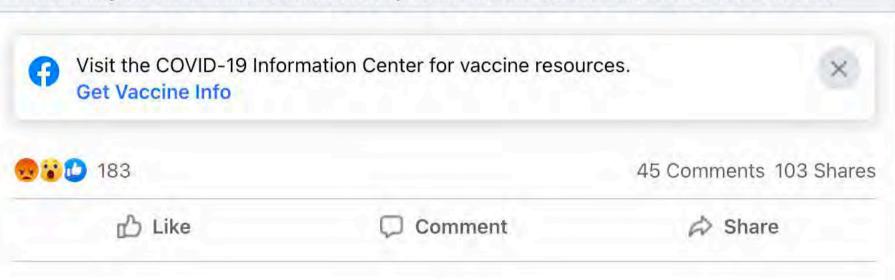




A new Digital Drivers License is currently in the works in Utah and other states. The program will include your driver's license info and your COVID-19 status. This will be tracked by the government and available to government employees.



The New Digital Driver's License Will Include Your Vaccine Status - May Eventually Include Your Credit Score, Travel Records and Social Credit Score...



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A new Digital Drivers License is currently in the works in Utah and other states. The program will include your driver's license info and your COVID-19 status. This will be tracked by the government and available to government employees.

# DIGITAL DRIVERS LICENSE

# Partly false



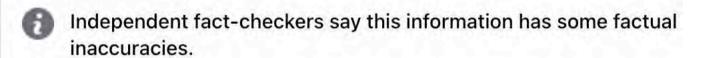
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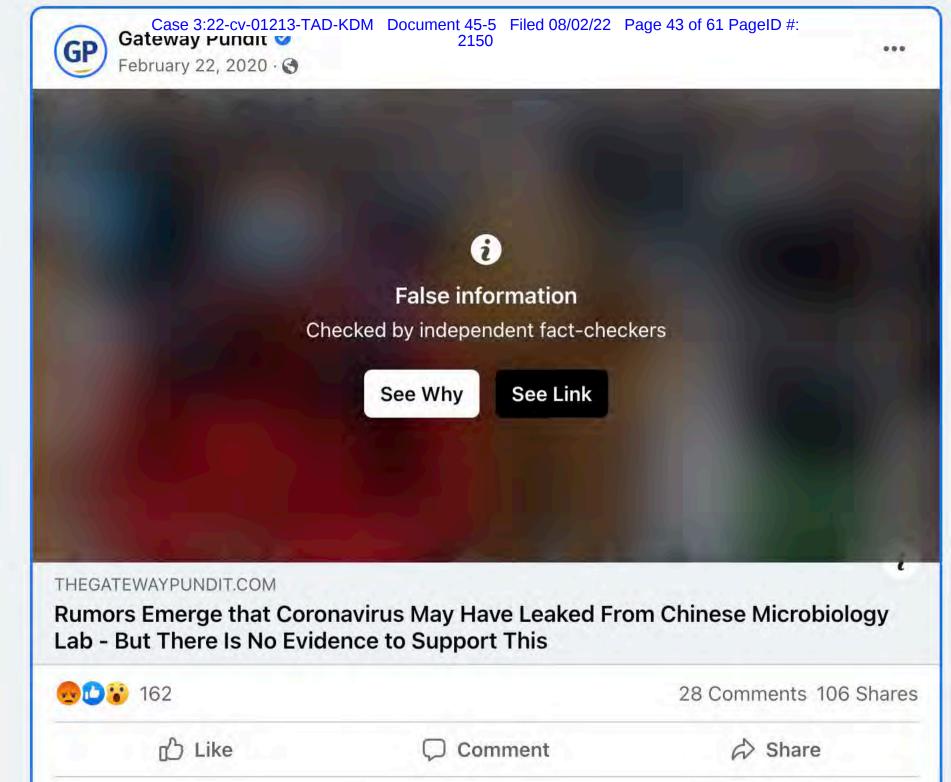
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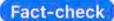
# False



# Fact-check from Science Feedback



Science Feedback Fact-check





Multiple scientific studies have indicated that the virus has a natural origin, not the result of human engineering

# About this notice



Independent fact-checkers say this information has no basis in fact.



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Rumors Emerge that Coronavirus May Have Leaked From Chinese Microbiology Lab - But There Is No Evidence to Support This









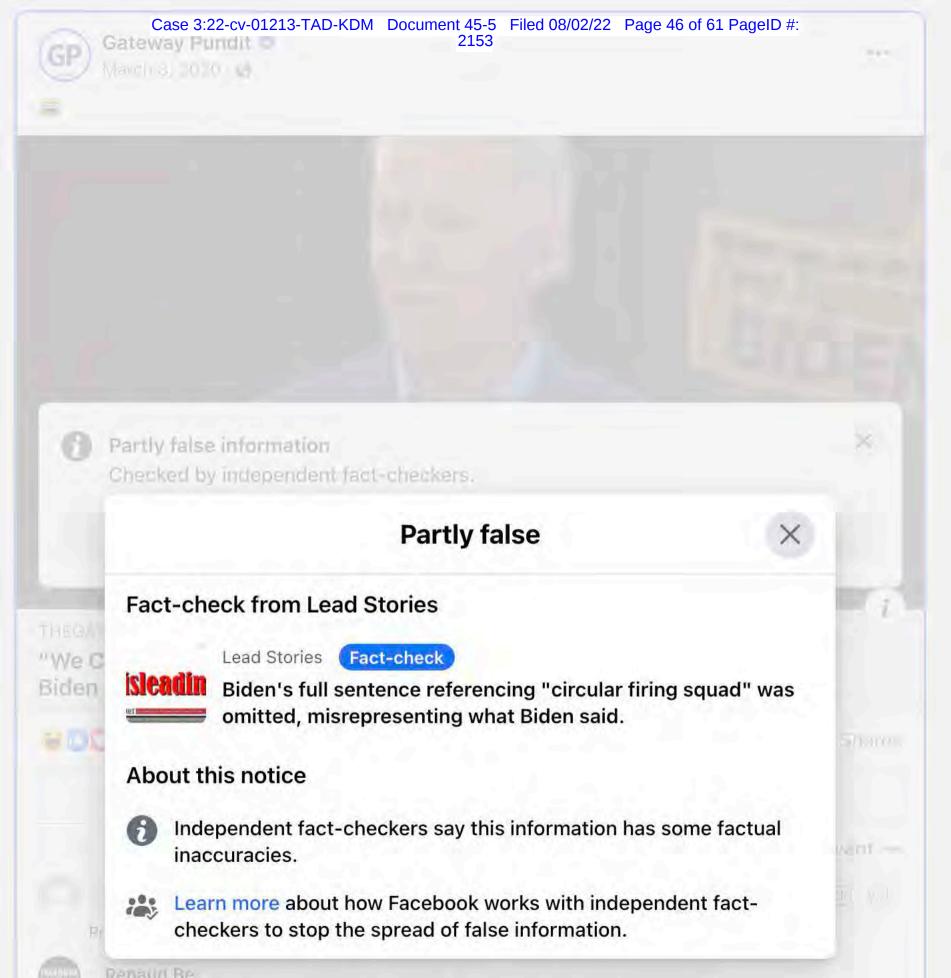


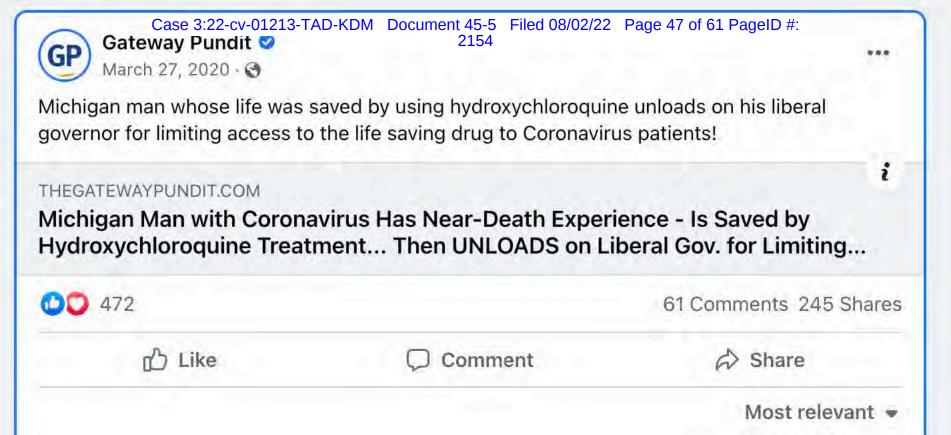


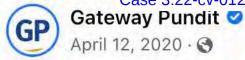
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"We Can Not Win This Election - We Can Only Reelect Donald Trump" - Joe Biden Speaks the Truth at St. Louis Rally (VIDEO)









And there it is!!



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And There It Is... Michigan Governor Gretchen Whitmer's Lack of Clarity Causes Confusion For Consumers During Lockdown



211 Comments 309 Shares





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May 6, 2020 · 🕙

Correction: This article has been corrected to reflect that Dr. Mikovits arrest was for taking lab notebooks, a computer, and other material belonging to the institute. These charges were ultimately dropped.



THEGATEWAYPUNDIT.COM

YouTube Deletes Video 'Plandemic' with Dr. Mikovits Accusing Dr. Fauci of Corruption and Suppression - Not Approved by Thought Police





Updated: This story has been updated to reflect that Oregon changed hundreds of Republican ballots to "Non Partisan" but blames voter error. The update includes a statement from Oregon State state and county officials regarding the procedures voters must follow and their conclusion that people failed to follow them.

# THEGATEWAYPUNDIT.COM.

Oregon Changes Hundreds of Republican Ballots To "Non Partisan" But Blames Voter Error for Denying GOP Voters the Right To Participate In Primary



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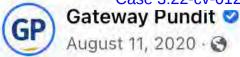


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Well this is awkward.

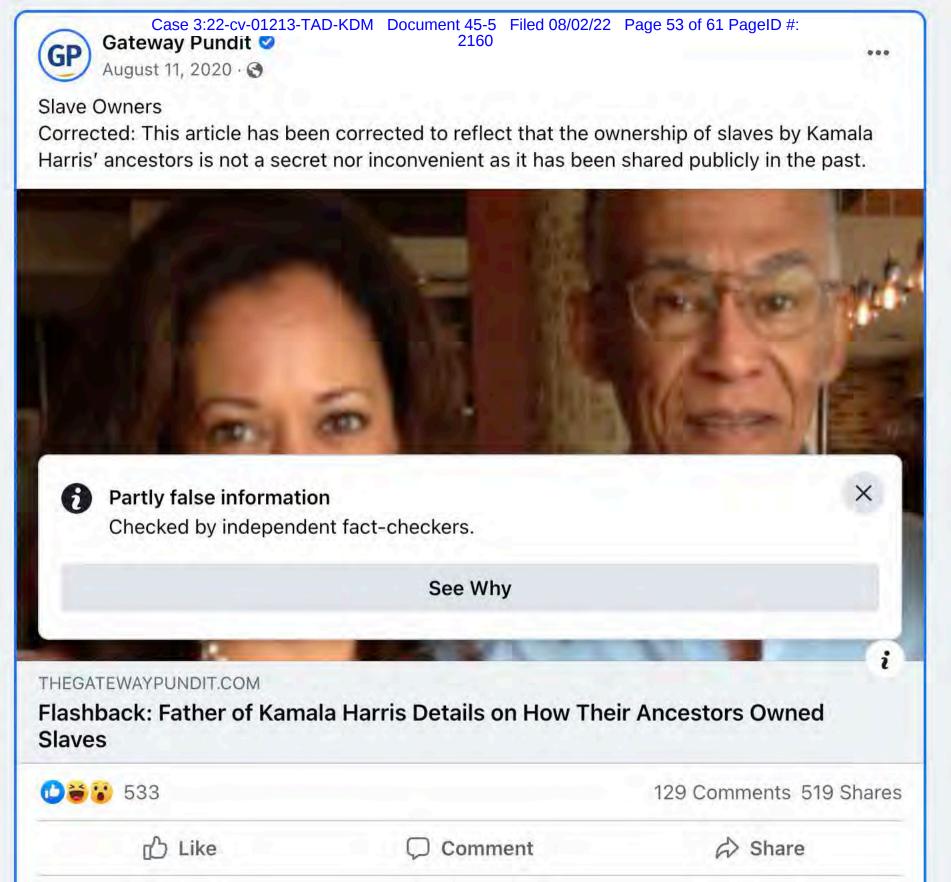
Corrected: This article has been corrected to reflect that Kamala Harris said she believes the women who came forward with their concerns with Joe Biden's unwanted touching but she has not publicly commented on Tara Reade's accusations of rape against former Vice President Biden.

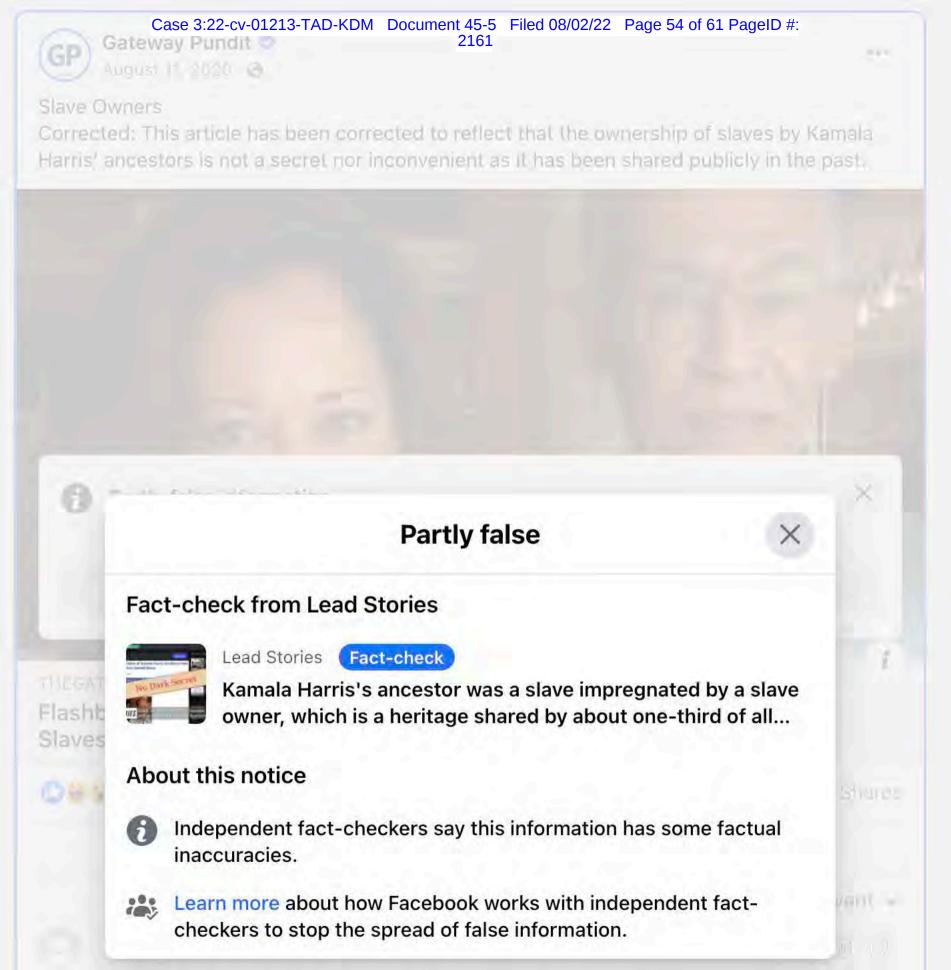
# THEGATEWAYPUNDIT.COM

Flashback: Kamala Harris Said She Believes Women Who Were Uncomfortable With Joe Biden's Unwanted Touching(VIDEO)



276





Correction: This article has been corrected to provide additional context for Harris's remarks.



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This is What Kamala Harris Thinks of Young Voters: 18-24 Year Olds Are "Really Stupid" (VIDEO)



44 Comments 137 Shares





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Correction: This post has been corrected to reflect that Harris was referring to protests rather than riots.

WATCH: A clip of Kamala Harris speaking to Stephen Colbert in June is going viral once again, as the party attempts to pivot away from their support of the violent riots.

# THEGATEWAYPUNDIT.COM

Kamala Harris on Support for BLM Protests: 'They're Not Gonna Stop,' Warns Everyone to 'Beware' (VIDEO)



















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# EXHIBIT 6



# President of my own Little World! 100 mil says So! Retweeted



Dennis Masivgeek @DennisMasivgeek · 10h

Judge Rules late changes to VA Election law is illegal? How?



Jim Hoft @ @gatewaypundit · Jan 29

Five Days After Biden Inauguration, Judge Rules Late Changes To VA Election Law That Allowed Late Mail-in-Ballots Without Postmark To Be Counted Is ILLEGAL @100PercFEDUP via @gatewaypundit thegatewaypundit.com/2021/01/nine-d...



This claim of election fraud is disputed, and this Tweet can't be replied to, Retweeted, or liked due to a risk of violence









# EXHIBIT 7



This Bulletin will expire on June 7, 2022 at 2:00 PM ET

\*\*The NTAS Bulletin issued on November 10, 2021 and set to expire on February 8, 2022 is hereby canceled.\*\*

# SUMMARY OF THE TERRORISM THREAT TO THE UNITED STATES

The United States remains in a heightened threat environment fueled by several factors, including an online environment filled with false or misleading narratives and conspiracy theories, and other forms of mis- dis- and mal-information (MDM) introduced and/or amplified by foreign and domestic threat actors. These threat actors seek to exacerbate societal friction to sow discord and undermine public trust in government institutions to encourage unrest, which could potentially inspire acts of violence. Mass casualty attacks and other acts of targeted violence conducted by lone offenders and small groups acting in furtherance of ideological beliefs and/or personal grievances pose an ongoing threat to the nation. While the conditions underlying the heightened threat landscape have not significantly changed over the last year, the convergence of the following factors has increased the volatility, unpredictability, and complexity of the threat environment: (1) the proliferation of false or misleading narratives, which sow discord or undermine public trust in U.S. government institutions; (2) continued calls for violence directed at U.S. critical infrastructure; soft targets and mass gatherings; faith-based institutions, such as churches, synagogues, and mosques; institutions of higher education; racial and religious minorities; government facilities and personnel, including law enforcement and the military; the media; and perceived ideological opponents; and (3) calls by foreign terrorist organizations for attacks on the United States based on recent events.

# **ADDITIONAL INFORMATION**

The primary terrorism-related threat to the United States continues to stem from lone offenders or small cells of individuals who are motivated by a range of foreign and/or domestic grievances often cultivated through the consumption of certain online content. The convergence of violent extremist ideologies, false or misleading narratives, and conspiracy theories have and will continue to contribute to a heightened threat of violence in the United States.

Key factors contributing to the current heightened threat environment include:

- (1) The proliferation of false or misleading narratives, which sow discord or undermine public trust in U.S. government institutions:
  - For example, there is widespread online proliferation of false or misleading narratives
    regarding unsubstantiated widespread election fraud and COVID-19. Grievances
    associated with these themes inspired violent extremist attacks during 2021.
  - Malign foreign powers have and continue to amplify these false or misleading narratives in efforts to damage the United States.
- (2) Continued calls for violence directed at U.S. critical infrastructure; soft targets and mass gatherings; faith-based institutions, such as churches, synagogues, and mosques; institutions of higher education; racial and religious minorities; government facilities and personnel, including law enforcement and the military; the media; and perceived ideological opponents:
  - Foreign terrorist organizations and domestic threat actors continue to amplify preexisting false or misleading narratives online to sow discord and undermine public trust
    in government institutions. Some of these actors do so to encourage unrest, which
    could lead to acts of violence against the facilities, individuals, institutions, and
    organizations cited above.
  - Violent extremists inspired by a range of grievances and ideologies continue to target crowded venues traditionally perceived to be soft targets, such as commercial and publicly accessible facilities, public gatherings, certain government and state facilities, and houses of worship.
  - The recent attack on a synagogue in Colleyville, Texas highlights the continuing threat
    of violence based upon racial or religious motivations, as well as threats against faithbased organizations.

# **RESOURCES TO STAY SAFE**

# **Stay Informed and Prepared**

- <u>Be prepared</u> for emergency situations and remain aware of circumstances that may place you at risk. Make note of your surroundings and the nearest security personnel.
- Keep yourself <u>safe online</u> and maintain <u>digital and media literacy</u> to recognize and build resilience to false or misleading narratives.
- Review DHS <u>resources</u> for how to better protect <u>businesses</u>, <u>houses of worship</u>, and <u>schools</u>, and ensure the safety of public gatherings.
- Prepare for potential <u>active shooter</u> incidents, as well as efforts to <u>prevent</u>, <u>protect against</u>, <u>respond to</u>, <u>and mitigate</u> the use of explosives.
- <u>Learn more</u> about community-based resources to help prevent individuals from radicalizing to violence.

## **Report Potential Threats**

- Listen to local authorities and public safety officials.
- If You See Something, Say Something®
  Report suspicious activity and threats of violence, including online threats, to local law enforcement, FBI Field Offices, or your local Fusion Center. Call 911 in case of emergency.
- If you know someone who is struggling with mental health issues or may pose a danger to themselves or others, seek help.

If You See Something, Say Something Report suspicious activity to local law enforcement or call 911.



This Bulletin will expire on June 7, 2022 at 2:00 PM ET

\*\*The NTAS Bulletin issued on November 10, 2021 and set to expire on February 8, 2022 is hereby canceled.\*\*

- Threats directed at Historically Black Colleges and Universities (HBCUs) and other colleges and universities, Jewish facilities, and churches cause concern and may inspire extremist threat actors to mobilize to violence.
- As COVID-19 restrictions continue to decrease nationwide, increased access to commercial and government facilities and the rising number of mass gatherings could provide increased opportunities for individuals looking to commit acts of violence to do so, often with little or no warning. Meanwhile, COVID-19 mitigation measures—particularly COVID-19 vaccine and mask mandates—have been used by domestic violent extremists to justify violence since 2020 and could continue to inspire these extremists to target government, healthcare, and academic institutions that they associate with those measures.
- Domestic violent extremists have also viewed attacks against U.S. critical infrastructure as a means to create chaos and advance ideological goals, and have recently aspired to disrupt U.S. <u>electric</u> and <u>communications</u> critical infrastructure, including by spreading false or misleading narratives about <u>5G cellular technology</u>.
- Some domestic violent extremists have continued to advocate for violence in response to false or misleading narratives about
  unsubstantiated election fraud. The months preceding the upcoming 2022 midterm elections could provide additional opportunities for
  these extremists and other individuals to call for violence directed at democratic institutions, political candidates, party offices, election
  events, and election workers.
- A small number of threat actors are attempting to use the evacuation and resettlement of Afghan nationals following the U.S. military withdrawal from Afghanistan last year as a means to exacerbate long-standing grievances and justify attacks against immigrants.

## (3) Calls by foreign terrorist organizations for attacks on the United States based on recent events:

- Foreign terrorist organizations will likely continue to maintain a highly visible online presence to attempt to inspire U.S.-based individuals to engage in violent activity.
- Supporters of foreign terrorist organizations have encouraged copycat attacks following the January 15, 2022 attack on a synagogue in Colleyville, Texas.
- Foreign terrorists remain intent on targeting the United States and U.S. persons, and may seek to capitalize on the evolving security environment overseas to plot attacks. The Islamic State of Iraq and ash-Sham (ISIS) or its affiliates may issue public calls for retaliation due to the strike that recently killed ISIS leader Abu Ibrahim al-Hashimi al-Qurayshi.

## **HOW WE ARE RESPONDING**

- DHS and the Federal Bureau of Investigation (FBI) continue to share timely and actionable information and intelligence with the broadest audience possible. This includes sharing information and intelligence with our partners across every level of government and in the private sector. We conduct recurring threat briefings with private sector and state, local, tribal, territorial, and campus partners, including to inform security planning efforts. DHS remains committed to working with our partners to identify and <a href="mailto:prevent-all-forms-of-terrorism-and-targeted-violence">prevent-all-forms-of-terrorism-and-targeted-violence</a>, and to support law enforcement efforts to keep our communities safe.
- <u>DHS's Office of Intelligence and Analysis</u> established a new, dedicated domestic terrorism branch to produce the sound, timely intelligence needed to counter related threats. The Department expanded its evaluation of online activity as part of its efforts to assess and prevent acts of violence, while ensuring the protection of privacy, civil rights, and civil liberties.
- DHS's <u>Center for Prevention Programs and Partnerships (CP3)</u> provides communities with resources and tools to help prevent individuals from radicalizing to violence. In 2021, CP3 awarded about \$20 million in grants through its <u>Targeted Violence and Terrorism Prevention Grant Program</u>. CP3 also partners with local communities to raise awareness about how to prevent violence.
- In 2021, DHS designated domestic violent extremism as a "National Priority Area" within its <u>Homeland Security Grant Program (HSGP)</u>, resulting in at least \$77 million being spent on preventing, preparing for, protecting against, and responding to related threats.
- In 2021, DHS's Nonprofit Security Grant Program (NSGP) provided \$180 million in funding to support target hardening and other physical security enhancements to non-profit organizations at high risk of terrorist attack.
- DHS is working with public and private sector partners, as well as foreign counterparts, to identify and evaluate MDM, including false or misleading narratives and conspiracy theories spread on social media and other online platforms that endorse or could inspire violence.
- <u>DHS's Cybersecurity and Infrastructure Security Agency (CISA)</u> works with public and private sector partners including U.S. critical infrastructure owners and operators to mitigate risk against our cyber and physical infrastructure and increase nationwide cybersecurity resilience.

If You See Something, Say Something Report suspicious activity to local law enforcement or call 911.