

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

**METROPOLITAN AFRICAN METHODIST  
EPISCOPAL CHURCH,**

**Plaintiff,**

**v.**

**PROUD BOYS INTERNATIONAL, L.L.C.,  
ENRIQUE TARRIO, JOHN DOES #1-8,**

**Defendants.**

**No. 2021 CA 000004 B**  
**Judge Heidi M. Pasichow**  
**Next Court Date: June**  
**25, 2021, 9:30 AM**  
**Event: Scheduling**  
**Conference**

**DECLARATION OF HEIDI BEIRICH**

I, Heidi Beirich, declare as follows under penalty of perjury:

**I. Qualifications**

1. I am the co-founder and Chief Strategy Officer of the Global Project against Hate and Extremism (GPAHE), a nonprofit organization that uses research, advocacy, and education to counter international extremism. Prior to the formation of GPAHE in 2020, I spent 20 years working for the anti-hate nonprofit Southern Poverty Law Center (SPLC). I was the director of SPLC's Intelligence Project, the premier hate monitoring organization in the United States.

2. I have nearly 30 years of experience studying, writing and speaking about the nature of fascist and white supremacist movements in the United States and around the world. I received a Ph.D. in political science from Purdue University with a specialty in fascist governments and their political structures as well as the democratization efforts that helped transition countries away from authoritarian regimes through various legal means, particularly in Spain and parts of Latin America. My dissertation focused on the democratization processes that

removed the fascist elements from the Spanish political system put in place by the governments of Francisco Franco, who ruled as a dictator from 1939 to 1975. I also hold M.A degrees in economics and political science. I have written books, book chapters and articles for academic publications on far-right extremist movements.

3. From 1999 until 2019, I worked for SPLC in a series of roles with increasing responsibility. From 2009 on, I either co-directed or solely directed the SPLC's Intelligence Project. In my role there, I oversaw a staff that grew from 15 to 40 individuals during my time as director and that produced hundreds of reports and articles about extremist movements in the United States, including several about the Proud Boys.<sup>1</sup> I have personally published dozens of articles and reports on extremist movements, white supremacist ideology, ideologically inspired terrorism and hate crimes.

4. The Intelligence Project investigated movements and individuals inspired by white supremacist, neo-Nazi, nativist, anti-Semitic, anti-Muslim, misogynistic, antigovernment and other forms of extremist beliefs. The project was devoted to ensuring the equal protection aims of the 14<sup>th</sup> Amendment, which are threatened by white supremacy and other exclusionary extremist movements. Our work exposing these movements was used in multiple ways to counter such threats to our democracy, including by tech companies enforcing their terms of service against dangerous organizations and hate speech, by law enforcement investigating hate crimes and domestic terrorism and by legislators crafting policies to combat hate.

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<sup>1</sup><https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>;  
<https://www.splcenter.org/hatewatch/2018/10/18/why-are-proud-boys-so-violent-ask-gavin-mcinnis>;  
<https://www.splcenter.org/hatewatch/2018/10/13/far-right-skinheads-join-proud-boys-assaulting-protesters-new-york-city-following-gavin>;  
<https://www.splcenter.org/hatewatch/2018/08/02/facebooks-fight-club-how-proud-boys-use-social-media-platform-vet-their-fighters>;  
<https://www.splcenter.org/hatewatch/2017/04/25/new-fight-club-ready-street-violence>;  
<https://www.splcenter.org/hatewatch/2017/08/10/do-you-want-bigots-gavin-because-how-you-get-bigots>;  
<https://www.splcenter.org/news/2018/10/18/weekend-read-violence-and-hate-thats-proud-boys-nutshell>.

5. One of my main responsibilities was overseeing the SPLC's annual count of active hate and anti-government groups. This required me to review evidence about thousands of extremists groups each year, a process that gave me great insight into the many forms of extremism extant in the United States. In February 2018, the SPLC added the Proud Boys to its hate group list, a little over a year after the group was founded, due to the widely documented racist and bigoted nature of the group. The SPLC defines a hate group as, "an organization or collection of individuals that—based on its official statements or principles, the statements of its leaders, or its activities—has beliefs or practices that attack or malign an entire class of people, typically for their immutable characteristics." The organizations on the list "vilify others because of their race, religion, ethnicity, sexual orientation or gender identity – prejudices that strike at the heart of our democratic values and fracture society along its most fragile fault lines."<sup>2</sup> The Proud Boys remain on the list to this day.<sup>3</sup>

6. In 2020, I co-founded GPAHE. This organization investigates the same movements as SPLC, but from a transnational and global perspective. Though the Proud Boys were founded in the United States, the group's first leader was a Canadian and there are chapters of the organization in other countries. GPAHE is particularly concerned with the export of hate from the United States into other countries and the rising threats to democracies coming from far-right extremist movements, such as those that we saw massed at the U.S. Capitol on January 6, 2021. GPAHE also works to counter and document the spread of online hate.

7. I have given dozens of presentations on extremism for academic, government and law enforcement audiences. I have testified twice in Congress on the dangers of extremism in the military and the threats posed by neo-Nazi accelerationist movements. I have

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<sup>2</sup> <https://www.splcenter.org/20200318/frequently-asked-questions-about-hate-groups>.

<sup>3</sup> <https://www.splcenter.org/fighting-hate/extremist-files/ideology/general-hate>.

advised government agencies, both here and abroad, on the nature of white supremacist and other extremist movements and the threat they pose to inclusive democracies, particularly in terms of terrorism and hate crimes. I have vetted legislative and other efforts to protect against and diminish the dangers of far-right extremism. My views on these movements have been included in numerous news reports over the last 20 years, including national news outlets such as *The New York Times*, *Washington Post*, *USA Today* and many others. I have been interviewed for dozens of TV news reports, documentaries, radio segments and podcasts.

8. My curriculum vitae is attached as Exhibit A to this Declaration.

## **II. Summary of Opinions**

9. The attorneys for Plaintiff Metropolitan African Methodist Episcopal Church (AME) asked me to provide my opinions about the Proud Boys, including their structure and organization and their ideological views. I have also been asked to consider the evidence regarding the attack on Metropolitan AME Church on December 12, 2020, in the context of my knowledge about the Proud Boys' organization, ideology and past actions.

10. The opinions I describe below are based upon my knowledge of the Proud Boys organization, ideology and prior actions, and upon my review of evidence concerning the attack on the Metropolitan AME Church on December 12, 2020.

11. Based on my analysis, I have reached the following principal opinions:

- The Proud Boys were founded upon, influenced by, and work to further white supremacy and other forms of hatred towards marginalized communities. White supremacy is at the core of the group's ideology.
- The Proud Boys are an inherently violent group. Its members have frequently made violent comments, praised violence and engaged in violent activities.

- The Proud Boys are engaged in social media activities involving incitement to violence, white supremacy, and other forms of hatred.
- The Proud Boys' attack on Metropolitan AME's property is part of a long history of white supremacist attacks on Black churches.
- The Proud Boys perceive the Black Lives Matter movement to be their enemy. Black Lives Matter is devoted to equal rights and justice for all, which is antithetical to the Proud Boys' white supremacist ideology. The Proud Boys claim, like many hate actors in American history, that their beliefs are anti-communist rather than racist. This claim is a pretext intended to mask their support for white supremacy, which drives their opposition to movements committed to civil rights and equality, including Black Lives Matter.
- The Proud Boys' December 12, 2020, attack was a natural outcome of the Proud Boys' belief system. In my opinion, the evidence of the activity on December 12, 2020 is consistent with vandalism motivated by race hate targeting Black institutions.
- The December 12, 2020, attacks were highly orchestrated and planned by the group's leadership.

### **III. Methodology and Sources**

12. In my role as director of the SPLC's Intelligence Project and now as chief strategy officer for the GPAHE, I have been monitoring the Proud Boys since they were established by Gavin McInnes in 2016. While at SPLC, I edited and/or co-wrote several reports on the organization and its membership, and I draw upon those years of study in preparing this report.

13. In the preparation for this declaration, I conducted an in-depth literature review of academic studies, books, court documents, incorporation papers and news reports about the group. I also reviewed material compiled by hate group monitoring organizations such as SPLC and the Anti-Defamation League about the Proud Boys organization, its leadership, its members and its allied groups in the white supremacist movement.

14. Literature reviews are an accepted method of social science research and are often published in academic journals as stand-alone efforts that improve understanding of an issue or area of a particular field. They also summarize work done in that area and establish the conclusions of what researchers have determined to that date about a particular subject. According to *Conducting Research Literature Reviews: From the Internet to Paper*,<sup>4</sup> a literature review surveys books, scholarly articles and any other sources relevant to a particular issue, area of research or theory, and by so doing, provides a description, summary, and critical evaluation of these works in relation to the research problem being investigated.

15. I also reviewed hundreds of social media posts made by Proud Boys members between 2017 and June 2021 on mainstream platforms such as Facebook and Reddit, and on Proud Boys social media channels on sites largely unregulated for hate speech, including Telegram and Parler. I also examined dozens of videos produced by the group and others documenting Proud Boys activities. I have reviewed other evidence from social media and other sources regarding the events of December 12, 2020, including first-hand accounts published on social media and elsewhere about the attack on the Metropolitan AME Church.

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<sup>4</sup> Arlene Fink. (2014) *Conducting Research Literature Reviews: From the Internet to Paper*, Fourth Edition: Thousand Oaks, SAGE.

16. I conducted this research to establish and document evidence of the beliefs, activities, membership and organizational structure of the Proud Boys, and what that reveals to us about the events of December 12 that I understand to be at issue in this case.

**IV. Background: Nature of the Proud Boys, Its Organization, Leadership, Structure, and Ideology**

17. The Proud Boys are an organization that espouses racist, misogynistic, Islamophobic, transphobic and anti-immigrant beliefs. Members, including those in leadership, have espoused white supremacy and worked hand in hand with other white supremacist groups.<sup>5</sup>

18. The Proud Boys is no loose association of individuals; to the contrary, it has formal legal structures. Proud Boys International LLC (PBI) is the governing organization of the Proud Boys. PBI has a formal constitution and bylaws, entitled “The Constitution and Bylaws of Proud Boys International LLC,” that lay out how the organization, its chapters and its membership are expected to function.<sup>6</sup> They were adopted in November 2018 when founder Gavin McInnes voluntarily left the group.<sup>7</sup> The highest level of decision-making is left to a governing “elders” chapter.<sup>8</sup> One of the elders is designated Chairman of the organization. Three other legal entities, Warboys LLC, Fund the West LLC and Proud Boys LLC, whose registered agent and other principals are members of the elders, have also existed as official Proud Boys corporate entities. Members of the Proud Boys pay dues both to the national body and to their local chapter.<sup>9</sup>

19. Leaders of the Proud Boys claim to have an official membership and are organized into chapters that have their own leadership. In September 2020, Proud Boys leader

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<sup>5</sup> <https://www.adl.org/proudboys>.

<sup>6</sup> <https://www.capitolhellway.com/wp-content/uploads/2020/10/Proud-Boys-Constitution-and-Bylaws.pdf>.

<sup>7</sup> <https://www.capitolhellway.com/wp-content/uploads/2020/10/Proud-Boys-Constitution-and-Bylaws.pdf>.

<sup>8</sup> <https://www.dallasobserver.com/news/former-proud-boy-lawyer-jason-van-dyke-says-an-internet-stalker-is-destroying-his-career-11641420>.

<sup>9</sup> <https://www.capitolhellway.com/wp-content/uploads/2020/12/Proud-Boys-Constitution-and-Bylaws.pdf>.

Enrique Tarrio said the group had 22,000 members worldwide.<sup>10</sup> Research undertaken by computer scientist Megan Squire examining the accounts of Proud Boys on Venmo, an online payments provider, found the group to be highly organized into chapters. The payments data showed a tight relationship in transactions among chapters and regions where chapters were located, indicating a high level of organization in the group.<sup>11</sup>

20. The Proud Boys wear a uniform, consisting of polo shirts made by the clothing company Fred Perry, in black and yellow. They use the brand's signature wreath as a symbol to advertise events. (In 2020, Fred Perry stopped producing these products to distance itself from the group).<sup>12</sup> If it chooses, the leadership of the group can direct its members to dress in other uniforms (or none at all). For example, in January 2021, Proud Boys leader Enrique Tarrio said that his group would have a large presence in Washington, D.C., during protests against the election outcome and that they could be dressed in black, similar to the clothing preferred by anti-fascist activists, so they could pass "incognito."<sup>13</sup> Tarrio also said that the group would break into smaller teams upon arrival at a rally, indicating a high level of coordination, and spread out across Washington, D.C.<sup>14</sup>

21. According to McInnes, there are four formalized levels that a Proud Boy can reach in the organization. These rites show a defined hierarchy of membership in the group

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<sup>10</sup> <https://www.insider.com/proud-boys-chairman-says-members-run-for-office-election-2020-9>.

<sup>11</sup> Megan Squire, "Understanding Gray Networks Using Social Media Trace Data," *Social Informatics*, November 2019.

<sup>12</sup> <https://www.dazeddigital.com/politics/article/50608/1/brief-history-of-the-violent-alt-right-group-the-proud-boys-donald-trump-debate>.

<sup>13</sup> <https://www.france24.com/en/americas/20210106-who-exactly-is-enrique-tarrio-leader-of-the-us-s-far-right-proud-boys-organisation>.

<sup>14</sup> Marc-Andre Argentino, Blyth Crawford, Florence Keen and Hannah Rose, "Far From Gone: The Evolution of Extremism in the First 100 Days of the Biden Administration," The International Centre for the Study of Radicalisation, 2021.

and, given the hazing rituals undertaken, that violence is inherent to the group's initiation processes.<sup>15</sup>

- i. Level One: Must publicly state, "I'm a Western chauvinist, and I refuse to apologize for creating the modern world."
- ii. Level Two: An initiate must limit masturbation and endure a beating from other members while reciting the name of breakfast cereals.<sup>16</sup>
- iii. Level Three: A member must get a Proud Boys tattoo.
- iv. Level Four: An honorary degree is awarded for "a material sacrifice or service by a brother." In reality, this commonly means engaging in street violence. Other possible sacrifices could include being doxxed, meaning having one's membership in the Proud Boys made public which could lead to negative consequences, or getting fired from one's employment as a result of association with the organization.<sup>17</sup>

22. Since November 2018, the leader of the group has been appointed by a conclave of eight "elders," who serve as the governing chapter of the entire Proud Boys organization. The current leader, Enrique Tarrio, has described parts of his role as including acting as a tie-breaking vote among the elders for rule changes and deciding whether members should attend particular rallies.<sup>18</sup>

23. Ample evidence exists of widespread white supremacist beliefs held by Proud Boys leadership and membership. Part of the Proud Boys practice is to promote an "anti-white guilt" or "anti-political correctness" agenda, which serves to cover up their hatred and bigotry by claiming their racist or bigoted comments are ironic or facetious or simply intended to trigger reactions in others rather than representing true expressions of the group's beliefs.<sup>19</sup> Even

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<sup>15</sup> [https://www.takimag.com/article/introducing\\_the\\_proud\\_boys\\_gavin\\_mcinnnes/](https://www.takimag.com/article/introducing_the_proud_boys_gavin_mcinnnes/); see also <http://archive.is/b77lQ>.

<sup>16</sup> Video of the ritual found here: <https://happymag.tv/proud-boys-initiation-is-cringe/>.

<sup>17</sup> <https://www.miamiherald.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>18</sup> <https://www.miamiherald.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>19</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

though members of the group often attempt to veil their racist or bigoted views with irony or excuses, the track record of hatred is definitive.

24. The Proud Boys have had three leaders since their founding in 2016. Gavin McInnes led the group from its founding until he relinquished leadership of the Proud Boys in November 2018. McInnes' announcement came a day after law enforcement documents were made public that suggested the FBI had classified the group as "extremist." One month earlier, nine members of the group had been charged with various offenses after violence broke out following a speech McInnes gave in Manhattan.<sup>20</sup> In his video, McInnes said his reason for quitting was to help members of the group who were arrested after his speech. "I'm told by my legal team and law enforcement that this gesture could help alleviate their sentencing," McInnes said.<sup>21</sup>

25. It is notable that McInnes was not removed by the Proud Boys from his post due to the violence in Manhattan; he left voluntarily and he has had continued contact with Proud Boys members since, particularly on Proud Boys social media channels where posts from McInnes continue to be shared. McInnes often also takes up for the Proud Boys on his podcast, "Get off My Lawn," where, for example, he defended the group's leader Enrique Tarrio from charges that he was an FBI informant during a January 2021 broadcast.<sup>22</sup>

26. After McInnes, Jason Van Dyke, who already had a long track record of involvement in hate group activity (including, as discussed below, tweeting images of nooses and other deeply disturbing racist words and images),<sup>23</sup> was a member of the Dallas-Fort Worth Proud

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<sup>20</sup> <https://www.thedailybeast.com/proud-boys-founder-gavin-mcinnis-quits-far-right-group>

<sup>21</sup> <https://katu.com/news/nation-world/proud-boys-founder-quits-the-group>

<sup>22</sup> <https://getoffmylawnpod.libsyn.com>

<sup>23</sup> <https://www.dallasobserver.com/news/former-proud-boy-lawyer-jason-van-dyke-says-an-internet-stalker-is-destroying-his-career-11641420>

Boys chapter, and served as the group's lawyer, assumed control for two days. He was elected to the post by the Proud Boys' elders, the governing body established in new bylaws created after McInnes' departure.<sup>24</sup> Van Dyke was ousted from the Proud Boys after only two days as chairman when he failed to fully redact the elders' names in a copy of the new bylaws he posted online. Again, it is notable that Van Dyke was not removed because of his long history of involvement in hate groups or for his racist and extremist comments, but rather for disclosing the names of Proud Boys leaders.

27. On November 29, 2018, Van Dyke was quickly replaced by Enrique Tarrio, who serves as the current chairman.<sup>25</sup> Like Van Dyke and McInnes, Tarrio has made racist and other bigoted comments. Tarrio met a Proud Boy during a protest in May 2017 and decided to join the group (while it was led by McInnes).<sup>26</sup> In August 2017, Tarrio joined other members of the Proud Boys in the violent white riots in Charlottesville, VA, saying he attended to protest the removal of Confederate monuments.<sup>27</sup> In 2018, while McInnes still headed the group, Tarrio achieved the highest rank in the Proud Boys, becoming a fourth degree member, which requires a physical altercation "for the cause." He achieved this status by punching someone he thought was an anti-fascist.<sup>28</sup>

28. The organization has had coherence in leadership. Members of the elders who were there in 2018 remain in that elite group and, as noted, the current leader, Tarrio, has been with the group since 2017. Also, although McInnes is no longer with the group, his social

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<sup>24</sup> <https://www.dallasobserver.com/news/former-proud-boy-lawyer-jason-van-dyke-says-an-internet-stalker-is-destroying-his-career-11641420>.

<sup>25</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boy>.

<sup>26</sup> <https://www.miamiherald.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>27</sup> <https://www.local10.com/news/2017/08/18/white-nationalist-who-attended-rally-in-charlottesville-explains-his-beliefs/>.

<sup>28</sup> <https://www.vox.com/2018/10/15/17978358/proud-boys-trump-biden-debate-violence>.

media posts are widely shared on their channels and he continues to take up for the Proud Boys on his podcast.

V. **OPINION 1: The Proud Boys were founded upon, influenced by, and work to further white supremacy and other forms of hatred towards marginalized communities. White supremacy is at the core of the group's ideology.**

29. White supremacy is defined by Oxford Languages, the world's leading dictionary publisher, as "the belief that white people constitute a superior race and should therefore dominate society, typically to the exclusion or detriment of other racial and ethnic groups, in particular black or Jewish people." It is my opinion that statements made by the Proud Boys, in particular their leaders, and the general ideological framework of the group as well as its activities, make clear that the Proud Boys fall under this definition.

30. When Gavin McInnes founded the group in 2016, he referred to it as a "pro-western fraternity." In an Op-Ed for *Taki's Magazine*, McInnes announced the formation of the group and described its members as "Western chauvinists who refuse to apologize for creating the modern world" and who "long for the days when 'girls were girls and men were men.'"<sup>29</sup> The term "western chauvinism" is thinly veiled code for white supremacy and patriarchal misogyny. The term is employed to make the Proud Boys' motives appear more palatable to mainstream audiences and to deflect charges of racism.

31. The choice of *Taki's Magazine* as a launch for the group is of note. The outlet has published many white supremacists, including prominent members of the movement such as Richard Spencer,<sup>30</sup> a leader in the August 2017 Charlottesville, VA, white riots; Peter Brimelow, who has long argued immigrants are destroying America's white culture;<sup>31</sup> and

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<sup>29</sup> <https://www.adl.org/proudboys>.

<sup>30</sup> <https://www.splcenter.org/fighting-hate/extremist-files/individual/richard-bertrand-spencer-0>.

<sup>31</sup> <https://www.splcenter.org/fighting-hate/extremist-files/individual/peter-brimelow>.

Jared Taylor,<sup>32</sup> who argues that Black and Brown people are inherently more violent than white people and whose ideas inspired Dylann Roof, who in 2015 killed nine people during a Bible study at Mother Emmanuel Church in Charleston, SC.<sup>33</sup> Spencer, who advocates that parts of the United States should be a white ethnostate,<sup>34</sup> served as managing editor at one time for the publication.<sup>35</sup>

32. McInnes' Op-Ed describes the Proud Boys' second meeting in New York City, which featured drinking and fighting, as well as reading excerpts of Pat Buchanan's book, *Death of the West: How Dying Populations and Immigrant Invasions Imperil Our Culture and Civilization*.<sup>36</sup> Buchanan's book explicitly endorses white supremacist ideas about the United States and claims that non-white immigrants are destroying the country.<sup>37</sup> Buchanan argues that America, the "greatest civilization in history," is heading towards becoming a "Third World" nation by 2050, approximately when the white population is slated by the Census Bureau to fall below 50% due primarily to non-white immigration. Buchanan cites several white supremacists to make his point, including the leader of the neo-Nazi National Alliance William Pierce, whose novel *The Turner Diaries* inspired Timothy McVeigh's bombing of a federal building in Oklahoma City in 1995. The original working title for Buchanan's book was *The Death of Whitey*, which the publisher rejected.<sup>38</sup> Buchanan clearly believed "whitey" to be equivalent to "western civilization," as do many white supremacists, including the Proud Boys.

33. The Proud Boys have adopted a creed, "The West is the Best," which is deeply telling of their bias against non-white ethnicities and non-Christian religions, which is

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<sup>32</sup> <https://www.splcenter.org/fighting-hate/extremist-files/individual/jared-taylor>.

<sup>33</sup> <https://www.splcenter.org/hatewatch/2017/08/10/do-you-want-bigots-gavin-because-how-you-get-bigots>.

<sup>34</sup> <https://www.vox.com/identities/2019/11/4/20947833/richard-spencer-white-nationalism-audio-milo-alt-right>.

<sup>35</sup> <https://www.miamiherald.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>36</sup> [https://www.takimag.com/article/introducing\\_the\\_proud\\_boys\\_gavin\\_mcinnes/](https://www.takimag.com/article/introducing_the_proud_boys_gavin_mcinnes/).

<sup>37</sup> <https://www.splcenter.org/hatewatch/2017/08/10/do-you-want-bigots-gavin-because-how-you-get-bigots>.

<sup>38</sup> <https://www.splcenter.org/fighting-hate/intelligence-report/2002/citing-neo-nazi-and-racist-sources-buchanan-sounds-alarm>.

common among white supremacists. At times, the Proud Boys use this coded language, like substituting “the West” or “Western civilization” for the racial category of whiteness, to wink and nod to white supremacy while trying to maintain plausible deniability that they are not a hate group.<sup>39</sup> But this is a façade belied by an extensive track record of racist and bigoted comments by members, as well as their extensive links to white supremacist and other hate groups.

34. There is a history of people who espouse racist views utilizing the term “western civilization” or variants of the phrase to make their racist views less obvious and more palatable. As Nell Irvin Painter, the Edwards Professor of American History at Princeton and author of *The History of Whiteness*, said in 2017, the meaning of the term is highly dependent on the views of the speaker.<sup>40</sup> Given the long track record of Proud Boys leaders’ and members’ racist and bigoted comments, their use of the term “western civilization” is a code word for preferring white people and believing in white superiority.

35. The bigotry of the basic purpose of the organization is evident from the rites of membership. For instance, to join the Proud Boys, all prospective members must submit a video stating, “I’m a Western Chauvinist, and I refuse to apologize for creating the modern world.” This is very close in wording and theme to one of the most popular white supremacist slogans, the “14 Words,” which reads: “We must secure the existence of our people and a future for our white children.” The slogan was coined by David Lane, a member of the domestic terrorist group The Order, which engaged in several acts of violence in the 1980s, including the assassination of Jewish Denver radio talk show host Alan Berg. It is the most widespread slogan in the white supremacist and neo-Nazi world, both here and abroad. Recent white supremacist mass murderers, including Dylann Roof and the Pittsburgh Tree of Life synagogue shooter, Jason Bowers, have used its

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<sup>39</sup> <https://www.npr.org/2021/04/26/990274685/how-extremists-weaponize-irony-to-spread-hate>.

<sup>40</sup> <https://archive.thinkprogress.org/when-western-civilization-is-code-white-nationalism-9a8cff6a99a1/>.

shorthand, just the number 14, in their writings. Often white supremacists post “1488,” which combines the 14 words with a reference to “Heil Hitler,” because “H” is the eighth letter in the alphabet. Both slogans emphasize the need to secure or preserve western civilization, which in the view of the speakers means the dominance of whites, in this context, and McInnes is aware of this fact. In an episode of McInnes’ video show that featured white nationalist Emily Youcis, she asked him to say the 14 Words. McInnes mostly complied, replacing “white” with “western.”<sup>41</sup> Overall, the Proud Boys’ slogan about Western chauvinists creating the modern world cannot be disentangled from the idea that Western is a code word for “white people.”<sup>42</sup> This is the idea that Pat Buchanan’s book plainly lays out.

36. Each of the three leaders of the Proud Boys has a demonstrated record of bigotry. To start with, McInnes has a long history of publicly making racist, anti-Semitic, misogynistic and other bigoted comments. His comments often equate whiteness with a superior culture, a fundamental tenet of white supremacy. In 2002, he said “We seem really racist and homophobic because we hang around with f\*\*\* and n\*\*\*\*\*s so much. It just becomes part of our vernacular.”<sup>43</sup> That same year, when he was asked by a reporter what he thought about his neighbors in New York City’s Williamsburg neighborhood, McInnes said, “Well, at least they’re not n\*\*\*\*\*s or Puerto Ricans. At least they’re white.”<sup>44</sup> In 2003, he told *The New York Times*, “I love being white and I think it’s something to be very proud of. I don’t want our culture diluted. We need to close the borders now and let everyone assimilate to a Western, white, English-speaking way of life.”<sup>45</sup> Note in this quote, western and white are equivalent.

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<sup>41</sup> Samantha Kutner, “Swiping Right: The Allure of Hyper Masculinity and Cryptofascism for Men Who Join the Proud Boys,” International Centre for Counter-Terrorism, May 2020.

<sup>42</sup> <https://www.miamiherald.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>43</sup> <https://www.adl.org/proudboys>.

<sup>44</sup> <https://www.snopes.com/news/2020/10/07/proud-boys-explained/>.

<sup>45</sup> <https://www.adl.org/proudboys>.

37. In a 2005 article on VDare.com, a white nationalist hate site, McInnes railed against Canadian multiculturalism and lamented that Jared Taylor, who runs *American Renaissance*, a publication that pushes discredited theories of “race science” and the inferiority of non-whites, had not been invited to speak at a college event.<sup>46</sup> (A decade later, McInnes would welcome Taylor onto his “The Gavin McInnes Show,” where Taylor would explain why he believes white people are “better” than Black people.) In 2016, McInnes called Jada Pinkett Smith, who is Black, a “monkey actress.”<sup>47</sup> He has also said that it is fair to describe him as an “Islamophobe.”<sup>48</sup>

38. On a November 2016 episode of “The Gavin McInnes Show,” he repeatedly yelled “Heil Hitler” and gave the Nazi salute.<sup>49</sup> In March 2017, McInnes was accused of anti-Semitism for posting a video on the far-right, anti-Muslim Rebel Media platform called “Ten Things I Hate about Jews,” which was later retitled “Ten Things I Hate About Israel.”<sup>50</sup> McInnes would later tweet, “10 THINGS I HATE ABOUT THE GODDAMN MOTHERFUCKING JEWS!” He has also justified discrimination against Jews, saying that historically, perhaps Jews “were ostracized for a good reason.”<sup>51</sup> Prior to a 2017 trip to Israel, McInnes appeared in another Rebel Media video, asking for people to fund his trip. In the video, he referenced two anti-Semitic works, *The Culture of Critique* by Kevin MacDonald and former leader of the Ku Klux Klan David Duke’s book *Jewish Supremacism*.<sup>52</sup>

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<sup>46</sup> <https://www.snopes.com/news/2020/10/07/proud-boys-explained/>.

<sup>47</sup> <https://www.npr.org/2021/04/09/985104612/conspiracy-charges-bring-proud-boys-history-of-violence-into-spotlight>.

<sup>48</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>49</sup> <https://www.adl.org/proudboys>.

<sup>50</sup> <https://web.archive.org/web/20190822004848/https://www.adl.org/resources/backgrounders/proud-boys>.

<sup>51</sup> <https://www.vox.com/2018/10/15/17978358/proud-boys-trump-biden-debate-violence>.

<sup>52</sup> <https://web.archive.org/web/20190822004848/https://www.adl.org/resources/backgrounders/proud-boys>.

39. On June 26, 2017, he posted to Twitter an endorsement of the white genocide theory, also called “The Great Replacement,” which is a foundational white supremacist belief that posits that white people are being replaced by people of color, in particular non-white immigrants, in their home countries. The tweet read, “This attitude + immigration = white genocide in the West (South Africa’s version is much more intense).”<sup>53</sup> The attitude McInnes was referring to was an allegation by the conspiratorial website InfoWars that white women were encouraged by feminists to abort babies, thus shrinking the white population.<sup>54</sup> On January 17, 2018, McInnes referred to Senator Cory Booker, who is Black, as a “Sambo” on his program, “Get Off My Lawn.”<sup>55</sup> On his CRTV show on April 24, 2018, McInnes said, “Muslims have a problem with inbreeding. They tend to marry their first cousins...When you have mentally damaged inbreds...and you have a hate book called the Koran...you end up with a perfect recipe for mass murder.”<sup>56</sup> In an undated YouTube video from “The Gavin McInnes Show,” which ran from 2015-2017, where he interviews right-wing author Ann Coulter, McInnes tells Coulter that economically successful countries she is discussing in terms of their cultural and religious aspects are “just a fancy way of saying white.”<sup>57</sup> She disagrees.

40. McInnes is also unapologetically misogynistic. He has written extensively on how women want to be “downright abused” and that he had to stop “playing nice” and begin “totally defiling the women I slept with” to get more women to have sex with him.<sup>58</sup> On June 28, 2017, on “The Gavin McInnes Show,” he called women “dumb” and said they do not excel in areas “like writing.”<sup>59</sup>

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<sup>53</sup> <https://www.baltimoresun.com/citypaper/bcp-102517-dic-proud-boys-20171025-story.html>.

<sup>54</sup> <https://www.splcenter.org/hatewatch/2017/08/10/do-you-want-bigots-gavin-because-how-you-get-bigots>.

<sup>55</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>56</sup> <https://www.miamiherald.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>57</sup> <https://youtu.be/uiSQdD1CQ9E>.

<sup>58</sup> <https://www.vox.com/2018/10/15/17978358/proud-boys-trump-biden-debate-violence>.

<sup>59</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

41. The individual who briefly replaced McInnes in November 2018, Texas lawyer Jason Van Dyke, exposed similarly racist views. Van Dyke was a member of the Dallas-Fort Worth chapter who had previously served as the group's attorney. Van Dyke already had a long history of involvement in neo-Confederate activism and hate groups.<sup>60</sup> He is also deeply racist. In 2014, Van Dyke tweeted a photo of a noose at a Black man and wrote, "Look good and hard at this picture you fucking n\*\*\*\*\*. It's where I am going to put your neck."<sup>61</sup> That same year, he told a Twitter user: "I will kill both you and your family."<sup>62</sup> In 2018, after his personal cell phone number was posted on Twitter and a number of anonymous users sent him mocking text messages, Van Dyke responded to many of the messages with photos of guns. He texted "fuck off f\*\*\*\*\*" to one person and "fuck off dumb n\*\*\*\*\*s" to another.<sup>63</sup> Van Dyke was deposed as leader of the Proud Boys after he released a document with the Proud Boys' bylaws, which also revealed the names of the group's elders, but has continued to associate with members.<sup>64</sup> For example, Oak Point, Texas, police allege in criminal case reports that Van Dyke worked with the Arizona chapter of the Proud Boys to conduct surveillance on a Phoenix man as part of a plot to either injure or murder him in late 2018.<sup>65</sup>

42. Current Proud Boys leader Enrique Tarrio, who was appointed in November 2018, has his own history of racist and bigoted comments. (Tarrio began his association with the group one year after the Proud Boys were founded, in 2017.)<sup>66</sup> In one of Tarrio's first posts on

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<sup>60</sup> <https://www.splcenter.org/fighting-hate/intelligence-report/2007/neo-nazi-preston-wiginton-joins-forces-young-americans-freedom-michigan-state-university>.

<sup>61</sup> <https://www.dailykos.com/stories/2020/4/19/1938272/-Proud-Boys-ex-attorney-used-his-comrades-to-spy-on-man-he-wanted-to-kill-police-say>.

<sup>62</sup> <https://www.corvallisadvocate.com/2018/hate-group-threatens-advocate-legally/>.

<sup>63</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>64</sup> <https://www.miamiherald.com/news/inside-miami-right-and-proud-boys-chapter-10945821>.

<sup>65</sup> <https://www.splcenter.org/hatewatch/2020/04/15/police-proud-boys-used-surveillance-part-violent-plot>.

<sup>66</sup> <https://www.france24.com/en/americas/20210106-who-exactly-is-enrique-tarrio-leader-of-the-us-s-far-right-proud-boys-organisation>.

the unregulated social media site Minds he wrote, “This [website] needs to get filled up with Proud Boys, not no f\*\*\*\*\* ass photogs!” He followed the post with, “Bitch n\*\*\*\*\* f\*\*\*\*\*tranny. Stress test 3.” Tarrio has called Islam a “shitstain religion.”<sup>67</sup> On his personal social media accounts, Tarrio denigrates transgender people and said that the African-American comic and actor Leslie Jones looked like a gorilla.<sup>68</sup> In 2018, his Twitter profile was suspended.<sup>69</sup> On his Telegram channel, Enrique’s House of Propaganda, he has posted many bigoted items. On November 25, 2020, one post read, “N\*\*\*\*as that smoke hookah suck dick.” In a November 2020 interview, Tarrio admitted that the Proud Boys attracted members who had white supremacist views.<sup>70</sup>

43. Other prominent members of the group have also publicly posted their racist, misogynist, and homophobic beliefs. For example, Joseph Randall “Joe” Biggs, a Proud Boys organizer from Florida who has been arrested in connection with his role in the January 6, 2021, Capitol attack,<sup>71</sup> wrote “Make Zimbabwe Rhodesia again”—a call for the return of a white colonialist government in the African nation that is commonly made by white nationalists.<sup>72</sup> According to Media Matters, Biggs “has repeatedly tweeted his approval of date rape and sexual violence.”<sup>73</sup> Media Matters lists several of his tweets including, “I like to reason with her (reason=chloroform) and then just drink a lot of beer and release” and “Every girl at this bar wants to fuck me. They don’t know it yet because the drugs haven’t kicked in.” Biggs has also written incendiary anti-LGBTQ tweets. He told his followers, “tranny’s eat kittens, and that’s just not

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<sup>67</sup> <https://www.miaminewtimes.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>68</sup> <https://www.miaminewtimes.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>69</sup> <https://www.france24.com/en/americas/20210106-who-exactly-is-enrique-tarrio-leader-of-the-us-s-far-right-proud-boys-organisation>.

<sup>70</sup> <https://www.insider.com/ousted-proud-boys-underling-attempts-white-supremacist-coup-2020-11>.

<sup>71</sup> [https://www.washingtonpost.com/local/legal-issues/joseph-biggs-arrested-capitol-riot/2021/01/20/1def0990-5b75-11eb-aaad-93988621dd28\\_story.html](https://www.washingtonpost.com/local/legal-issues/joseph-biggs-arrested-capitol-riot/2021/01/20/1def0990-5b75-11eb-aaad-93988621dd28_story.html).

<sup>72</sup> <https://www.splcenter.org/hatewatch/2020/12/16/proud-boys-destroy-churches-black-lives-matter-signs-during-protest-washington-dc>.

<sup>73</sup> <https://www.mediamatters.org/right-side-broadcasting/new-host-unofficial-version-trump-tv-encouraged-date-rape-and-punching>.

cool man. Punch a tranny save a pussy” and attacked those who disagree with him by calling them “f\*%.”<sup>74</sup>

44. Leaders of the Proud Boys repeatedly make light of hateful beliefs spread or shared by members or try to brush off such comments as pushing boundaries or as forms of humor. Asked about the private posts other Proud Boys made on Minds glorifying hatred against women and Jewish people, Tarrío admitted they were offensive. But he downplayed the situation by arguing that members of the group were simply seeing what they could get away with after being banned from mainstream social media sites in October 2018. Tarrío told the *Miami New Times* that hateful posts were not a reflection of posts in private groups, which he declined to reveal, describing them as mainly about beer and “trannies.”<sup>75</sup>

45. The Proud Boys powerfully illustrate that an organization with an Afro-Cuban leader, meaning Tarrío, and Jewish members is quite capable of racism and anti-Semitism.<sup>76</sup> This may appear anomalous at first, but there is a history of both Jewish people and people of color being involved in white supremacist movements. For example, William Potter Gale, a leader in the viciously anti-Semitic Christian Identity movement, which believes Jews are literally the spawn of Eve and Satan, had Jewish heritage that members of his family openly embraced.<sup>77</sup> Daniel Burros, also Jewish, became a member of a Klan group and killed himself when his true identity was unmasked by *The New York Times*.<sup>78</sup> Leo Felton, whose father was Black, described

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<sup>74</sup> <https://www.mediamatters.org/right-side-broadcasting/new-host-unofficial-version-trump-tv-encouraged-date-rape-and-punching>.

<sup>75</sup> <https://www.miaminewtimes.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>76</sup> <https://www.adl.org/blog/proud-boys-bigotry-is-on-full-display>.

<sup>77</sup> <https://www.splcenter.org/fighting-hate/intelligence-report/2002/exploring-what-behind-rare-phenomenon-jewish-anti-semites>.

<sup>78</sup> <https://www.splcenter.org/fighting-hate/intelligence-report/2002/exploring-what-behind-rare-phenomenon-jewish-anti-semites>.

himself as “Aryan” and called his mixed race heritage a curse.<sup>79</sup> In 2002, he was convicted in a conspiracy to blow up Jewish and Black landmarks.<sup>80</sup> There are other examples as well.<sup>81</sup>

46. The white supremacist nature of the Proud Boys is clear to other white supremacists and former members of the group. And white supremacists and neo-Nazis have cited McInnes as a gateway to more blatant and open racism and anti-Semitism. On “The Southern AF Podcast,” one former Proud Boy who went on to openly embrace white supremacy said he was originally drawn to the group because of its “pro-white sentiment.”<sup>82</sup> On a 2017 broadcast of The Right Stuff (TRS), a white supremacist radio show, Caeralux Rex described the group as the following: “if they were just hanging out at the bar with me and the guys from my pool party and they were pressed on the issue, I guarantee you that like 90% of them would tell you something along the lines of, ‘Hitler was right. Gas the Jews’...All the guys that pretty much fit the description that you just gave, they’re all going to migrate to IE [the white nationalist group Identity Evropa] or a [neo-Nazi] Daily Stormer Book Club or a Pool Party from the TRS forums like I’m in, etc.”<sup>83</sup> Co-host Dunstan replied, “You’re essentially doing white nationalism but you came up with a new name for it.”<sup>84</sup> A former member has publicly denounced the group for its racism. Dante Nero, a Brooklyn-based comedian and reportedly the inspiration for the Proud Boys’ no-masturbation policy, told NPR in 2017 that after he was admitted to a private Proud Boys group on Facebook, he was appalled by what he saw. Nero, who is Black, said the group was filled with “n\*\*\*\*\* this, n\*\*\*\*\* that, Nazi this, there was all this white-supremacist stuff...pictures

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<sup>79</sup> <https://www.splcenter.org/fighting-hate/intelligence-report/2001/skinhead-leo-felton-plots-boston-bombing>.

<sup>80</sup> <https://www.splcenter.org/fighting-hate/intelligence-report/2001/skinhead-leo-felton-plots-boston-bombing>.

<sup>81</sup> [https://www.washingtonpost.com/national-security/minorities-far-right-visible-role/2021/05/16/e7ba8338-a915-11eb-8c1a-56f0cb4ff3b5\\_story.html](https://www.washingtonpost.com/national-security/minorities-far-right-visible-role/2021/05/16/e7ba8338-a915-11eb-8c1a-56f0cb4ff3b5_story.html).

<sup>82</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>83</sup> <https://www.splcenter.org/hatewatch/2017/08/10/do-you-want-bigots-gavin-because-how-you-get-bigots>.

<sup>84</sup> <https://www.splcenter.org/hatewatch/2017/08/10/do-you-want-bigots-gavin-because-how-you-get-bigots>.

of old cartoons of the black dude with the big lips and the bone.”<sup>85</sup> Nero’s experience shows that claims that the group is devoted to “western chauvinism” or “western civilization” are belied by the racist and anti-Semitic nature of the group’s members when interacting privately.

47. Other academic experts on the Proud Boys agree with my view that the group pushes white supremacy regardless of its wordplay using terms like “Western civilization” as a code for white, and that members’ claims that they are often being facetious when using racist or bigoted terms are bogus. “They are information launderers,” says C.V. Vitolo-Haddad, a University of Wisconsin-Madison researcher who analyzed the Proud Boys’ social networks. “They take much more extreme ideologies and launder them into the public eye under the guise of irony.”<sup>86</sup> Kris McGuffie, the deputy director of the Center on Terrorism, Extremism, and Counterterrorism at the Middlebury Institute of International Studies at Monterey, told *Insider* that the group “purports to be against white supremacy, while overtly promoting the precise theories and narratives that white supremacists are known for.”<sup>87</sup>

48. In February 2018, the Southern Poverty Law Center (SPLC), my employer until December 2019, classified the Proud Boys as a hate group in its annual “Year in Hate and Extremism” report which I co-wrote, stating, “Their disavowals of bigotry are belied by their actions. Rank-and-file Proud Boys and leaders regularly spout white nationalist memes and maintain affiliations with known extremists. They are known for anti-Muslim and misogynistic rhetoric.”<sup>88</sup> The SPLC’s Cassie Miller has explained that the Proud Boys’ use of “jokes” is strategic. “It distracts from what their actual political ideology is and from their violence,” Miller

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<sup>85</sup> <https://www.miamiherald.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>86</sup> <https://www.miamiherald.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

<sup>87</sup> <https://www.insider.com/ousted-proud-boys-underling-attempts-white-supremacist-coup-2020-11>.

<sup>88</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

told NPR in April 2021. “Because if you point it out, it’s, like, ‘well, they’re so goofy,’” thus making light of their white supremacy and violence.<sup>89</sup>

49. Irony has long been used by white supremacists as a tactic and should not be allowed to disguise the Proud Boys’ racist beliefs. For example, historians have documented how early iterations of the Ku Klux Klan were portrayed by group members and their allies as outlandish, rather than as the United States’ first domestic terrorist group. According to Elaine Frantz, a historian at Kent State University, to make itself less frightening, the Klan of the late 1800s put on racist minstrel shows and sang their own songs. Descriptions of attacks by men in hoods, who had titles like “grand dragon” or “wizard” were often seen by white Americans as tall tales and ghost stories, allowing them to ignore reports of violence against Black people. Pro-Klan newspapers played up supposedly innocuous aspects of the group and mocked their opponents who warned of its dangers. Pro-Klan newspaper editors would often “talk jokingly about what the Klan has done,” Frantz told NPR in April 2021, “in order to be deniable.”<sup>90</sup> The Proud Boys are following in the Klan’s footsteps.

50. There is ample, additional evidence of white supremacist beliefs among the ranks of the Proud Boys. Members of the Proud Boys often use signs and slogans associated with white supremacy. For example, the Proud Boys typically use the “OK” hand symbol, which has ties to white supremacist ideology and is often displayed by members of the group.<sup>91</sup> For some, the symbol looks like a “W” and “P” for white power. The Anti-Defamation League lists the “OK” symbol in its hate symbol database along with other white supremacist indicators. The gesture,

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<sup>89</sup> <https://www.npr.org/2021/04/26/990274685/how-extremists-weaponize-irony-to-spread-hate>.

<sup>90</sup> <https://www.npr.org/2021/04/26/990274685/how-extremists-weaponize-irony-to-spread-hate>.

<sup>91</sup> [https://www.adl.org/hate-symbols?cat\\_id\[153\]=153&utm\\_source=PANTHEON\\_STRIPPED&utm\\_medium=PANTHEON\\_STRIPPED&utm\\_campaign=PANTHEON\\_STRIPPED&gclid=EA1aIQobChMI4rXLmP-v8AIVCWpvBB05UgZWEAMYASAAEgJcAPD\\_BwE](https://www.adl.org/hate-symbols?cat_id[153]=153&utm_source=PANTHEON_STRIPPED&utm_medium=PANTHEON_STRIPPED&utm_campaign=PANTHEON_STRIPPED&gclid=EA1aIQobChMI4rXLmP-v8AIVCWpvBB05UgZWEAMYASAAEgJcAPD_BwE).

which was long an innocuous symbol of agreement, was transformed through ironic trolling culture on the message board 4chan in 2017 to become an expression of white supremacy in certain contexts. According to the Anti-Defamation League, this transformation was best exemplified in March 2019 when Brenton Tarrant, the white supremacist who plead guilty to murdering 51 people in back-to-back mass shootings at two mosques in Christchurch, New Zealand, smiled and flashed the sign to reporters at a court hearing on his case.<sup>92</sup>

51. I have reviewed video evidence of a Proud Boy member in a black beret and yellow insignia breaking from the crowd on December 12, 2020, and raising both hands in an “OK” hand signal.<sup>93</sup> I have reviewed photographs of Enrique Tarrio flashing the same symbol.<sup>94</sup> Tarrio’s website, 1776, sells t-shirts that incorporate the symbol. I have reviewed these items and photographs of Proud Boys members using the “OK” symbol and conclude that it is a hate symbol in this context and meant to convey support for white supremacy.

52. Additional, extensive evidence exists in the public domain showing that Proud Boys promote and frequently react positively to white supremacist and anti-Semitic content. For instance:

- i. In a series of posts on Minds in 2018, an academic researcher found racist and bigoted posts in a Proud Boys private group. They included an October 30, 2018, post by Proud Boy Adam Richard that read, “Zuckerberg is a N\*\*\*\*\*-f\*\*\*\*\*!” The next day, another group member, “Joey the Rhodie” posted a photo of a Hasidic Jewish man dancing captioned, “When the UN adds another million to the Holocaust death toll.” On November 2, 2018, “KaiserW” shared a photo of Elliot Rodger, a violent misogynist who shot six people in Isla Vista, CA, in a 2014 rampage. The post was captioned, “Believe in something. Even if it means sacrificing everything.”<sup>95</sup>

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<sup>92</sup> <https://www.nytimes.com/2019/12/15/us/ok-sign-white-power.html>.

<sup>93</sup> Complaint ¶ 84.

<sup>94</sup> Complaint ¶ 84.

<sup>95</sup> <https://www.miamiherald.com/news/inside-miami-alt-right-and-proud-boys-chapter-10945821>.

- ii. The Proud Boys' Telegram channels are filled with racist and bigoted material. I have reviewed dozens of posts and found several that repost hate content from white supremacist websites such as Vdare.com. Posts regularly express the idea that white people are being genocided as a result of rising numbers of non-white immigrants in historically white nations. For example, on September 7, 2020, a Proud Boys Telegram channel posted, "The true minority in this world ARE whites. White children are less than 3% of the worlds [sic] population...the white majority is on a pathway to extinction."<sup>96</sup>
- iii. In mid-December an image, taken in Washington, D.C. during the events of December 12, 2020, started circulating on social media. The image featured a Proud Boy wearing a Proud Boys hat and a t-shirt emblazoned with the text "6MWE."<sup>97</sup> It stands for "6 Million Wasn't Enough," implying that it would have been better if more Jews had died in the Holocaust.<sup>98</sup>
- iv. A Telegram channel associated with the Proud Boys ran racist and violent posts in September 2020. On September 7, 2020, a post read: "The true minority in this world ARE whites. White children are less than 3% of the worlds [sic] population. I think since white majority countries are on a pathway to extinction we should correctly refer to non whites by their true names. Worldwide majority."<sup>99</sup> Another post on September 22 read: "All the heroes of BLM and Antifa are degenerate criminal lowlifes or pedophile rapists. I don't lose any sleep when they are justly removed from society."<sup>100</sup>
- v. Several additional examples of racism and white supremacy expressed by members of the group are set out in Appendix 1 to this Declaration.

53. As illustrated by the examples below, members of the Proud Boys have frequently worked in concert with other white supremacists and hate groups.

- i. On October 12, 2017, McInnes spoke at the Republican Club in Manhattan. After the event, a violent fight broke out between Proud Boys members and anti-fascists. Two members of the Proud Boys were ultimately convicted for gang assault, attempted assault and rioting.<sup>101</sup> During and after the event, the Proud Boys worked with at least three skinheads. Joe Bola and Dennis Davila are members of 211 Bootboys, an ultranationalist far-right skinhead crew based mostly in the New York metropolitan area. The crew

<sup>96</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>97</sup> <https://www.snopes.com/fact-check/proud-boy-6mwe/>.

<sup>98</sup> <https://www.adl.org/blog/proud-boys-bigotry-is-on-full-display>.

<sup>99</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>100</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>101</sup> <https://www.bbc.com/news/world-us-canada-50148024>.

has often worked alongside neo-Nazi racist skinheads, often during hate music shows. In addition to his membership in the 211 Bootboys, Davila runs a hate music company called United Riot Records (URR). Bola was photographed wearing a URR shirt. The third skinhead at the New York event, known only as “Irv,” belonged to a crew of primarily Latino skinheads called B49, or “Battalion 49.” Irv was present during the “Unite the Right” rally in Charlottesville, VA, in 2017 as a member of the then Proud Boys-affiliated group the Fraternal Order of Alt-Knights.<sup>102</sup> McInnes took a picture with Bola at an anti-Muslim rally in 2017. Bola posed flashing a hand sign for the 211 Bootboys.<sup>103</sup>

- ii. The Proud Boys participated in the 2017 protests at the University of California, Berkeley, alongside a variety of white supremacist groups, including the neo-Nazi Rise Above Movement (RAM), the white supremacist Identity Evropa (IE), and the neo-Nazi Traditionalist Worker Party (TWP). Similarly, members of Identity Evropa and TWP have joined with the Proud Boys and the right-wing group Patriot Prayer at a series of protests in Portland, OR. One man, wearing a patch for the Proud Boys affiliate the Fraternal Order of Alt-Knights attended an October 2017 neo-Nazi “White Lives Matter” rally in Shelbyville, TN. During the rally, he taunted counterprotesters by destroying an anti-fascist flag.
- iii. On June 10, 2017, members of the Proud Boys joined the anti-Muslim hate group ACT for America’s “March Against Shariah” rallies that were held in 28 cities. At the New York event, Proud Boy Pawl Bazile gave a speech contrasting his own Italian forebears with today’s Muslim immigrants. “Give us a reason to accept you,” he yelled, “because you know what? Sharia law ain’t it. Raping women ain’t it. Cutting off clits ain’t it. Throwing gay people off roofs ain’t it. You are a disgrace.” He also referred to Burkas as a “ghost costume.”<sup>104</sup>
- iv. Members of the Proud Boys attended the violent August 2017 “Unite the Right” white supremacist rally in Charlottesville, VA, which ended in the murder of antiracist activist Heather Heyer by a white supremacist. The event was organized by Jason Kessler, a Proud Boy at the time, who invited numerous white supremacist groups to participate.<sup>105</sup> White supremacist leaders including Richard Spencer, David Duke (former head of the KKK) and others participated. White supremacist groups, including the League of the South, Identity Evropa and the Traditionalist Workers Party, were also on hand. Kyle Chapman, a white nationalist who founded the subgroup of the Proud Boys known as the Fraternal Order of Alt-Knights,

<sup>102</sup> <https://www.splcenter.org/hatewatch/2018/10/13/far-right-skinheads-join-proud-boys-assaulting-protesters-new-york-city-following-gavin>.

<sup>103</sup> <https://www.splcenter.org/hatewatch/2018/10/13/far-right-skinheads-join-proud-boys-assaulting-protesters-new-york-city-following-gavin>.

<sup>104</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>105</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

participated.<sup>106</sup> Alex Michael Ramos, one of the men convicted of assaulting a Black man with metal pipes in a parking garage during the protests, claimed he joined the Proud Boys after Charlottesville.<sup>107</sup> Members of the group later circulated an image of themselves in a celebratory pose with a flag they “captured” from anti-fascist activists.<sup>108</sup>

- v. Enrique Tarrio was among the participants in Charlottesville. He served as part of the militia security for the rally.<sup>109</sup>
- vi. Brien James, Proud Boys chapter president in Indiana, is a former neo-Nazi skinhead and founder of the violent, racist skinhead group Vinlanders Social Club. Jason Van Dyke, after leaving the Proud Boys, attempted to join the neo-Nazi terrorism group The Base,<sup>110</sup> and former Proud Boy Chris Hood founded the neo-Nazi group NSC-131.<sup>111</sup> Yet another member of the Proud Boys, Paul Skinner, is a former member of the neo-Nazi National Socialist Movement, according to documents obtained by the Anti-Defamation League.<sup>112</sup> Rick Hervey, while he was the vice president of the Colorado chapter, appeared in a Facebook photo wearing a shirt bearing the white supremacist “14 Words” slogan and John Camden, once the New Hampshire chapter vice president, has a neo-Nazi Wolfsangel tattooed on his neck.<sup>113</sup>
- vii. Research by Elon University computer scientist Megan Squire shows great overlap between Proud Boys Facebook accounts, prior to their deletion in 2018, and those of other hate groups. Squire’s dataset of Proud Boys and its affiliate Fraternal Order of Alt-Knights (FOAK) Facebook posts from 2017-2018 shows that of 7,920 Proud Boys or FOAK accounts in her data set, 1,714 of them were also in at least one group Squire classified as “alt-right,” by which she was referring to suit and tie white supremacists as opposed to more hard core neo-Nazis; 1,117 were in an anti-government group (armed militias are a subset of this category); 594 of them were in at least one neo-Confederate group; and 524 of them were in at least one anti-Muslim group.<sup>114</sup>

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<sup>106</sup> Complaint ¶ 28.

<sup>107</sup> <https://www.ajc.com/news/crime--law/georgia-man-gets-six-years-for-charlottesville-beating/ETG6StFvbV3Kq2MghoXtbL/>.

<sup>108</sup> <https://web.archive.org/web/20190822004848/https://www.adl.org/resources/backgrounders/proud-boys>

<sup>109</sup> <https://t.co/2ffkbqE7ar>; <https://t.co/sSIxPP6C8>;  
[https://twitter.com/UR\\_Ninja/status/1311387031923298304?s=20](https://twitter.com/UR_Ninja/status/1311387031923298304?s=20).

<sup>110</sup> <https://www.vice.com/en/article/wx8xp4/a-proud-boys-lawyer-wanted-to-be-a-nazi-terrorist>.

<sup>111</sup> <https://patch.com/massachusetts/malden/massachusetts-hate-group-had-role-capitol-hill-riot>.

<sup>112</sup> <https://www.adl.org/blog/proud-boys-bigotry-is-on-full-display>.

<sup>113</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>114</sup> Megan Squire directly shared these results with the author.

**VI. OPINION 2: The Proud Boys are an inherently violent group. Members of the group have frequently made violent comments, praised violence and engaged in violent activities.**

54. Violence is a core part of the Proud Boys ideology and their main recruiting tool.<sup>115</sup> This violence has parallels to other fraught historical periods as was recently described in a report by Samantha Kutner of the International Centre for Counter-Terrorism. She described how researchers and academics have compared the Proud Boys to fascist groups from the 1930s, in particular Nazi leader Adolf Hitler's Sturmabteilung (SA), better known as the Stormtroopers. The SA "provided protection for Nazi rallies and assemblies, disrupted the meetings of opposing parties, [fought] against the paramilitary units of the opposing parties, and intimidated marginalized communities."<sup>116</sup>

55. Incidents attributed to the Proud Boys show that the group has mirrored the SA by providing protection to far-right speakers and provocateurs; disrupting events by feminists, democratic socialists on campuses, and women's marches, among other opposing parties; and by intimidating marginalized communities through rallying, stalking, violence, and other intimidation campaigns. During the 2018 sentencing of two Proud Boys found guilty of gang assault, assault, and riot charges, New York Supreme Court Justice Mark Dwyer said, "I know enough about history to know what happened in Europe in the Thirties. We don't want that to happen in New York, especially at this time in the country when people are so divided." A constitutional law professor made this same comparison while recounting his experience during the Oregon Museum of Science and Industry lockdown, which happened due to a Proud Boys rally. He recalled the comments of his friend, Justice Hans Linde, who escaped Nazi Germany and relocated with his

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<sup>115</sup> <https://www.niot.org/blog/proud-boys-president-trump-message-violent-hate-group-stand-by>.

<sup>116</sup> Samantha Kutner, "Swiping Right: The Allure of Hyper Masculinity and Cryptofascism for Men Who Join the Proud Boys," International Centre for Counter-Terrorism, May 2020.

family to Portland. Linde once confided in him that, “His first clear memory was of watching from the family apartment while Nazis in brown shirts brawled with communists on the [Berlin thoroughfare] Kurfürstendamm below.”<sup>117</sup>

56. Proud Boys founder Gavin McInnes has regularly endorsed the use of violence. In a June 2016 episode of “The Gavin McInnes Show,” he said, “We will kill you. That’s the Proud Boys in a nutshell. We will kill you. We look nice, we seem soft, we have boys in our name...we will assassinate you.” In 2017, he said in an interview that violence “is a really effective way to solve problems.”<sup>118</sup> McInnes declared in 2018: “I want violence, I want punching in the face. I’m disappointed in Trump supporters for not punching enough.”<sup>119</sup> Also in 2018, defending British anti-Muslim activist Tommy Robinson, McInnes said, “[O]ur adversaries want to not silence speech, [but] kill the person talking... And that will be a huge victory for them. So the reaction has been very good on our side of things. We’ve said ‘no you’re not going to kill Tommy - we’re going to kill you! We’re going to fight back!’”<sup>120</sup>

57. One of the group’s hazing rituals, required to move up in the organization to the third degree, includes calling out the names of cereal brands while being punched in the face.<sup>121</sup> Being punched, meaning an act of violence, is part of the group’s indoctrination procedures. In addition, to be accepted as a fourth degree Proud Boy, the highest level of official membership within the group, one suggested action is to physically assault an anti-fascist

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<sup>117</sup> Samantha Kutner, “Swiping Right: The Allure of Hyper Masculinity and Cryptofascism for Men Who Join the Proud Boys,” International Centre for Counter-Terrorism, May 2020.

<sup>118</sup> <https://web.archive.org/web/20190822004848/https://www.adl.org/resources/backgrounders/proud-boys>.

<sup>119</sup> <https://www.youtube.com/watch?v=6SJGSrYLWxQ&t=3s>.

<sup>120</sup> <https://www.splcenter.org/hatewatch/2018/08/02/facebooks-fight-club-how-proud-boys-use-social-media-platform-vet-their-fighters>.

<sup>121</sup> <https://www.thedailybeast.com/new-proud-boy-rules-less-fighting-less-wanking>.

activist.<sup>122</sup> Enrique Tarrio completed the fourth stage for becoming a Proud Boy by punching in the face someone he believed to be an anti-fascist activist in June 2018.<sup>123</sup>

### *Proud Boys Praise Violence*

58. The Proud Boys have a clear history of inciting, supporting, and praising violence under the guise of self-defense, saying “responding to small slights with brutal force is key to the Proud Boys’ strategy.”<sup>124</sup> The group’s members often declare “We don’t start fights, we finish them.”<sup>125</sup>

59. Joe Biggs, one of the men charged with criminal activity during the Capitol insurrection on January 6, joined the Proud Boys in 2018 and became an organizer for the group. Biggs has compared planning for Proud Boys events to “planning to go into a combat zone.”<sup>126</sup> He has often demonstrated support for violence. For example, Biggs recorded a video of himself holding an American-flag-themed bat with spikes on the end, saying he was preparing to “bust some heads.” He also wore a t-shirt with the phrase “Training to Throw Communists Out of Helicopters” emblazoned on the front.<sup>127</sup> (As discussed below, this refers to the practice of Chilean death squads under the government of former President Pinochet of killing political opponents by throwing them out of helicopters.) Former Proud Boys Chairman Jason Van Dyke was recorded in 2018 discussing an alleged plot to murder and/or psychologically torture a Phoenix man who

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<sup>122</sup> Marc-Andre Argentino, Blyth Crawford, Florence Keen and Hannah Rose, “Far From Gone: The Evolution of Extremism in the First 100 Days of the Biden Administration,” The International Centre for the Study of Radicalisation, 2021.

<sup>123</sup> <https://www.france24.com/en/americas/20210106-who-exactly-is-enrique-tarrio-leader-of-the-us-s-far-right-proud-boys-organisation>.

<sup>124</sup> <https://www.niot.org/blog/proud-boys-president-trump-message-violent-hate-group-stand-by>.

<sup>125</sup> <https://www.nytimes.com/2019/08/19/nyregion/proud-boys-verdict-trial.html>.

<sup>126</sup> <https://www.npr.org/2021/04/09/985104612/conspiracy-charges-bring-proud-boys-history-of-violence-into-spotlight>.

<sup>127</sup> <https://www.npr.org/2021/04/09/985104612/conspiracy-charges-bring-proud-boys-history-of-violence-into-spotlight>.

filed a bar complaint against Van Dyke, resulting in the suspension of his law license.<sup>128</sup> In the recording, Van Dyke also discussed how he used the Arizona Proud Boys chapter to conduct surveillance of the Phoenix man's home.<sup>129</sup>

60. In January 2019, Reggie Axtell, a Proud Boy and collaborator with the Pacific Northwest far-right group Patriot Prayer, threatened Portland Mayor Ted Wheeler, saying that his days are “fucking numbered.” “I promise you this, Ted Wheeler: I’m coming for you, you little punk. And all your little antifa bastards.”<sup>130</sup>

61. On a December 2020 episode of War Boys, a livestreamed Proud Boys show which aired after the election, Joe Biggs described government officials as “evil scum” who “deserved to die a traitor’s death.” Ethan Nordean, a Proud Boys Elder, replied, “Yup, Day of the Rope.”<sup>131</sup> The phrase “Day of the Rope” is a reference to the novel *The Turner Diaries* written by neo-Nazi leader William Luther Pierce, which is one of the most prolific and influential texts among far-right extremist and white supremacist communities. It refers to an incident in the book where white supremacist rebels carry out mass lynchings of those they perceive to have betrayed the white race.<sup>132</sup>

62. In January 2021, members of the Proud Boys posed for a photo with Kyle Rittenhouse in a bar in Mt. Pleasant, WI. Rittenhouse is accused of fatally shooting two men during an August 2020 racial justice protest in Kenosha, WI. In the photo, Rittenhouse flashes the

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<sup>128</sup> <https://www.splcenter.org/hatewatch/2020/06/02/recording-former-proud-boys-leader-jason-van-dyke-lays-out-plans-stalking-terror-campaign>.

<sup>129</sup> <https://www.splcenter.org/hatewatch/2020/06/02/recording-former-proud-boys-leader-jason-van-dyke-lays-out-plans-stalking-terror-campaign>.

<sup>130</sup> <https://www.splcenter.org/hatewatch/2019/01/25/proud-boy-threatens-portland-mayor-im-coming-you>

<sup>131</sup> Marc-Andre Argentino, Blyth Crawford, Florence Keen and Hannah Rose, “Far From Gone: The Evolution of Extremism in the First 100 Days of the Biden Administration,” The International Centre for the Study of Radicalisation, 2021.

<sup>132</sup> <https://www.theatlantic.com/politics/archive/2016/09/how-the-turner-diaries-changed-white-nationalism/500039/>.

“OK” sign and is clad in a t-shirt with a Proud Boys slogan.<sup>133</sup> Tarrío’s website, 1776 Shop, sells t-shirts that read, “Kyle Rittenhouse did nothing wrong,” in no uncertain terms glorifying Rittenhouse’s violent acts.<sup>134</sup>

63. Some Proud Boys have normalized the idea of political violence, and even civil war, against political enemies, including racial and religious minorities. For example, the Proud Boys have been at the forefront of the “boogaloo” meme, which emerged in 2019 and involves far-right extremists using the term “boogaloo” as a masked reference to a hoped-for second American civil war, one that will involve a race war as well.<sup>135</sup> Tarrío’s 1776 shop sells t-shirts depicting AK-47 long guns described as “Boogaloo-AK47.”<sup>136</sup>

#### *Violent Rhetoric Endemic to Proud Boys*

64. Violent rhetoric by members of the Proud Boys is common. Proud Boys social media accounts are filled with violent references. For example, in June 2018, Gabe Silva, a Sacramento Proud Boy, said in a Facebook video, “The time is now. We’re gonna have to get some swollen fists...We’re gonna have to fight, alright?”<sup>137</sup> Other examples of celebrating violence can be found on Tarrío’s website, 1776.shop, which sells many items of merchandise featuring weapons as well as violent slogans such as “Death to Antifa.”<sup>138</sup> There are t-shirts with an image of a hand gun and the label “Walther PeepPeepQ Unisex T-Shirt,”<sup>139</sup> a “2<sup>ND</sup> Degree Proud Boy Challenge Coin” with an image of brass knuckles on one side,<sup>140</sup> t-shirts depicting

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<sup>133</sup> <https://www.washingtonpost.com/nation/2021/01/14/kyle-rittenhouse-proud-boys-bar/>.

<sup>134</sup> <https://slate.com/technology/2019/02/proud-boys-1776-shop-paypal-square-chase-removed.html>.

<sup>135</sup> Alex Newhouse, Adel Arlett and Leela McClintock, *Proud Boys Amplify Anti-Vax and Coronavirus Disinformation*, Center on Terrorism, Extremism and Counterterrorism, Smith College, May 1, 2020.

<sup>136</sup> <https://1776.shop/product/boogaloo-ak47-hawaiian>.

<sup>137</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>138</sup> <https://1776.shop/?s=antifa>.

<sup>139</sup> <https://1776.shop/product/walther-peeppeepq-unisex-t-shirt/>.

<sup>140</sup> <https://1776.shop/product/2nd-degree-hf-challenge-coin/>.

rifles, including AR-15s, Uzis, Tec-9s and other long guns,<sup>141</sup> a sticker reading, “Hell yes We’re Going to Give it to you Bullets First,”<sup>142</sup> and a whole line of “War Boys” items.<sup>143</sup>

65. Extensive chat logs reported on in 2019 by *The Huffington Post* show violent comments in advance of a rally planned for Providence, RI for April 6, 2019 (the rally ultimately did not occur).<sup>144</sup> Event organizer Alan Swinney wrote, “We’ll grow this group of patriots and we’ll never back down...If we win, it will make more patriots come to the next rally. We just need to go there and we’ll beat them. We’ll have enough to crush them at some point.” Proud Boy Anthony Mastrostefano said, “All I want to do is smash commies too. Actually I’m lying, I’m way past just hitting them. When the time comes I will stop at nothing to fully eradicate them all!” Proud Boy Shaun Hufton wrote, “This motherfucker needs to meet a 7mm [Magnum Rifle] from about 500 yards.” Proud Boy Peter Scott wrote, “armor up boys!” Members posted pictures of themselves with weapons, including an axe and a knife.

66. Social media accounts run by Proud Boys are also filled with glorification of violence. Examples of violent imagery include (for more on each image, see footnote):<sup>145</sup>

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<sup>141</sup> <https://1776.shop/product/bullpup-rifle-mk-ii-galaxy/>; <https://1776.shop/product-category/1776-official/boogaloo/>.

<sup>142</sup> <https://1776.shop/product/beto-clapback-die-cut-sticker/>.

<sup>143</sup> <https://1776.shop/product-category/headware/page/2/>.

<sup>144</sup> [https://www.huffpost.com/entry/proud-boys-chat-logs-premeditate-rally-violence-in-leaked-chats\\_n\\_5ce1e231e4b00e035b928683?guccounter=1](https://www.huffpost.com/entry/proud-boys-chat-logs-premeditate-rally-violence-in-leaked-chats_n_5ce1e231e4b00e035b928683?guccounter=1).

<sup>145</sup> First image posted by Bob Ochs, leader of the Proud Boys’ Hawaii chapter to his personal Telegram channel, The Ochs Report, on June 16, 2108; second image reposted to the Proud Boys Uncensored Telegram channel from the Seattle Proud Boys Telegram channel on August 10, 2020; third image posted by Proud Boy Russell Schultz on Facebook on July 16, 2019.



The Ochs Report

*Is it always illegal  
to KILL a woman?*



Legal hint: no.



Seattle Proud Boys Aug 10, 2020 1:49:54 PM 2.5K



Show up or shut up 2020

**DEATH TOLL OF POLITICAL  
VIOLENCE. LIBS 1 DEATH.  
CONSERVATIVES 58 DEATHS**



67. The Proud Boys use violence as a means for recruiting new members. This was most evident in the hours and days after the first presidential debate held on September 29, 2020. During the debate, then-President Trump, after being asked if he would condemn white supremacist groups, responded, “Proud Boys – stand back and stand by.” Within minutes, members of the group were celebrating on their social media channels, calling the President’s

comments “historic.” In one Telegram channel group, members called the President’s comment a tacit endorsement of their violent tactics. Another message noted they were seeing a spike in “new recruits.”<sup>146</sup> The group began selling a t-shirt that read, “Proud Boys Standing By.”<sup>147</sup> The celebratory video of destroying the BLM sign at the Metropolitan AME church on December 12, 2020, should be seen in this vein. It was posted to social media as a way to entice more members to join the group.

### *Examples of Proud Boys’ Street Violence*

68. Members of the Proud Boys have for years engaged in orchestrated violence and intimidation during events and counterprotests.

- i. Kyle Chapman, who founded the Proud Boys-affiliated Fraternal Order of Alt-Knights, rose to fame on the far right after a video of him breaking a wooden stick over the head of an anti-fascist protester at a March 2017 “March 4 Trump”<sup>148</sup> rally in Berkeley, CA, went viral.
- ii. On July 8, 2017, Proud Boys acted on conspiratorial content distributed by the white supremacist site Canadian Free Press. Proud Boys used this information to justify a visit intended to intimidate the mostly Muslim community of Islamberg, New York, which they wrongly believed to be an Islamic terrorist training camp, describing it as a site for “recruiting, housing, and training terrorists, as well as a place away from the public eye to stockpile weapons.” They formed a “Ride Along Caravan” through the community to intimidate citizens of Islamberg.<sup>149</sup>
- iii. As has already been discussed here, members of the Proud Boys were involved in the white riots that took place in a series of white supremacist rallies held in Charlottesville, VA, in August 2017.
- iv. In September 2017, the far-right group Patriot Prayer, with Proud Boys members participating, and the local anti-hate coalition “Portland Stands United Against Hate” held competing rallies on the same day in Portland. Several fights broke out and three people were arrested, one for speeding towards counterprotesters in a car.

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<sup>146</sup> <https://www.nytimes.com/2020/09/29/us/trump-proud-boys-biden.html>.

<sup>147</sup> <https://www.masslive.com/news/2020/09/stand-back-and-stand-by>.

<sup>148</sup> <https://www.splcenter.org/hatewatch/2017/08/10/do-you-want-bigots-gavin-because-how-you-get-bigots>.

<sup>149</sup> Samantha Kutner, “Swiping Right: The Allure of Hyper Masculinity and Cryptofascism for Men Who Join the Proud Boys,” International Centre for Counter-Terrorism, May 2020.

- v. On January 29, 2018, the anniversary of the 2017 Quebec, Canada, mosque massacre where six people were killed and 19 were injured, several far right and anti-Muslim groups held a protest against a memorial for the victims. They included the anti-Muslim movement PEGIDA Canada, the Three Percenter militia, and Proud Boys. They protested the memorial in an effort they claimed would, “debunk the myth of systematic Islamophobia.” Their choice to demonstrate on the anniversary of the mosque massacre was an attempt to evoke a response from—and maximize the suffering of—Muslim communities affected by this tragedy.<sup>150</sup>
- vi. In May 2018, a Proud Boy appeared at the home of a video editor in an effort to intimidate him. The video editor had published material lampooning the group and its founder, Gavin McInnes.<sup>151</sup>
- vii. On June 3, 2018, Donovan Flippo, a Proud Boy, and Allen Puckett of the rabidly anti-LGBT group Hells Shaking Street Preachers, were filmed attacking a man outside of a parking garage.<sup>152</sup>
- viii. On June 8, 2018, Proud Boys Donovan Flippo and Tusitala “Tiny” Toese assaulted a man in Portland. They plead guilty and, as part of his two-year probation, Toese was banned from attending protests. He was charged with violating his probation in June 2020<sup>153</sup> after he was filmed shoving and dragging a protester outside of Seattle’s Capitol Hill Autonomous Zone (CHAZ).<sup>154</sup>
- ix. In September 2018, Toese tried to attack two Black men after a rally in Austin. Apparently angered by their Obama hats, Toese flew into a rage and shouted, “You won’t survive in my world, boy” and “I’ll blow through your fucking window!” while the men hid inside of a store. Police had to intervene.<sup>155</sup>
- x. In October 2018, several Proud Boys were arrested in connection with a brawl that occurred outside the Metropolitan Republican Club in Manhattan.<sup>156</sup> Violence broke out after a speaking appearance by McInnes

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<sup>150</sup> Samantha Kutner, “Swiping Right: The Allure of Hyper Masculinity and Cryptofascism for Men Who Join the Proud Boys,” International Centre for Counter-Terrorism, May 2020.

<sup>151</sup> [https://www.huffpost.com/entry/far-right-proud-boys-menaced-twitter-user-on-his-doorstep\\_n\\_5b06de68e4b07c4ea1060e92](https://www.huffpost.com/entry/far-right-proud-boys-menaced-twitter-user-on-his-doorstep_n_5b06de68e4b07c4ea1060e92).

<sup>152</sup> <https://www.splcenter.org/hatewatch/2018/08/02/facebooks-fight-club-how-proud-boys-use-social-media-platform-vet-their-fighters>.

<sup>153</sup> <https://www.splcenter.org/presscenter/splc-statement-proud-boys-rally-portland-ore>.

<sup>154</sup> <https://www.splcenter.org/presscenter/splc-statement-proud-boys-rally-portland-ore>.

<sup>155</sup> <https://www.theguardian.com/world/2018/jun/16/portland-proud-boys-alleged-attack-man-patriot-prayer-joe-gibson>.

<sup>156</sup> <https://www.nytimes.com/2018/12/23/nyregion/gavin-mcinnis-proud-boys-nypd.html?module=inline>;  
<https://www.nytimes.com/2019/08/19/nyregion/proud-boys-verdict-trial.html>.

where he reenacted the 1960 murder of a Japanese socialist leader by a teenage ultranationalist.<sup>157</sup> Ten Proud Boys members punched, kicked, and stomped four victims who were never identified.<sup>158</sup> Proud Boys members Maxwell Hare and John Kinsman were convicted of attempted gang assault, attempted assault, and rioting.<sup>159</sup> Seven other members plead guilty.<sup>160</sup> At least three individuals involved in the brawl were members of 211 Bootboys, an ultranationalist far-right skinhead group based in the New York metropolitan area.<sup>161</sup> In one video of the violence, a far-right assailant in a group of at least 15 screams, “Fa\*\*\*\*!” as he kicks a person lying curled up on the pavement. In another, the men cheer and gloat as they leave the scene of the mob assault. One yells a Proud Boys motto, “Fuck around, find out!” and says, “Dude, I had one of their fucking heads, and I was just fucking smashing it in the pavement!” “That son of a bitch!” the man says of his beating victim. “He was a fucking foreigner.”<sup>162</sup>

- xi. Also in October 2018, counterprotesters sparred with members of the Proud Boys and Patriot Prayer during a “Resist Marxism” rally at the Rhode Island State House. No arrests were made after a fist fight, which ended when someone sprayed the crowd with a fire extinguisher.<sup>163</sup>
- xii. Leaked chats published by Unicorn Riot in 2020<sup>164</sup> from the “PNW [Pacific Northwest] Patriot Group,” a coalition of Proud Boys, members of the militia group Three Percenters and the hate group Wolves of Vinland’s Operation Werewolf, described how this alliance colluded to create a shieldwall for an August 22, 2019, “No to Marxism” rally in Portland, OR. The wall allowed them to spray protesters with mace without fear of retaliation.
- xiii. At an August 22, 2020, rally in Portland, Proud Boys member Alan Swinney repeatedly fired a paintball gun into a crowd of protesters. Swinney also pointed a pistol at protesters.<sup>165</sup>

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<sup>157</sup> <https://www.nytimes.com/2019/08/14/nyregion/proud-boys-trial-gavin-mcinnis.html>.

<sup>158</sup> <https://www.nytimes.com/2019/08/14/nyregion/proud-boys-trial-gavin-mcinnis.html>.

<sup>159</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>160</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>161</sup> <https://www.splcenter.org/hatewatch/2018/10/13/far-right-skinheads-join-proud-boys-assaulting-protesters-new-york-city-following-gavin>.

<sup>162</sup> <https://www.splcenter.org/hatewatch/2018/10/13/far-right-skinheads-join-proud-boys-assaulting-protesters-new-york-city-following-gavin>.

<sup>163</sup> <https://www.adl.org/blog/weekend-clashes-emblematic-of-political-violence-around-the-country>.

<sup>164</sup> <https://unicornriot.ninja/2020/leaked-2019-chats-show-alan-swinney-co...-with-proud-boys-american-guard-and-militias-to-plan-violent-rallies/>.

<sup>165</sup> <https://www.splcenter.org/presscenter/splc-statement-proud-boys-rally-portland-ore>.

- xiv. In videos I have examined of a September 7, 2020, Black Lives Matter protest in Clackamas, OR, Proud Boys members rushed social justice protestors and attacked them with baseball bats and fists.<sup>166</sup>

*Law Enforcement Consider Proud Boys Violent and Extremist*

69. The Proud Boys were listed as a “terrorist entity” in Canada in February 2021. The Canadian government determined that the group is fundamentally violent and “fueled by white supremacy.”<sup>167</sup>

70. Law enforcement has also verified the dangerous nature of the Proud Boys. In 2018, the FBI described the Proud Boys as an “extremist group with ties to white nationalism,” according to an internal report from law enforcement in Washington State.<sup>168</sup> Files from Blueleaks, internal law enforcement documents released in June 2020, reveal extensive warnings about the Proud Boys, which some law enforcement agencies have labeled as “white supremacist,” “extremist,” and as a “gang.” Repeated warnings about the Proud Boys, and descriptions of them as a dangerous white supremacist group, were issued by members of the national network of counterterrorism fusion centers.<sup>169</sup> The Colorado Information Analysis Center (CIAC), the state’s division of homeland security, described the “threat to Colorado” of the Proud Boys and the “concern that white supremacist extremists will continue attacking members of the community who threaten their belief of Caucasian superiority.” In 2019, a Texas-based fusion center, the Austin Regional Intelligence Center, warned in a “Special Event Threat Assessment” of potential

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<sup>166</sup>[https://mobile.twitter.com/MrOlmos/status/1303110704350728193?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1303110704350728193%7Ctwgr%5E%7Ctwcon%5Es1\\_&ref\\_url=https%3A%2F%2Fd-6493090631349793978.ampproject.net%2F2105072136000%2Fframe.html](https://mobile.twitter.com/MrOlmos/status/1303110704350728193?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1303110704350728193%7Ctwgr%5E%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fd-6493090631349793978.ampproject.net%2F2105072136000%2Fframe.html).

<sup>167</sup> <https://apnews.com/article/canada-proud-boys-terrorist-group-510b8cd8286f1207a726904f61e63e4d;https://indianexpress.com/article/explained/explained-who-are-proud-boys-far-right-group-terrorist-entity-canada-7176421/>.

<sup>168</sup> <https://www.npr.org/2018/11/20/669761157/fbi-categorizes-proud-boys-as-extremist-group-with-ties-to-white-nationalism>.

<sup>169</sup> The details about the BlueLeaks documents come from: <https://www.theguardian.com/world/2020/oct/01/proud-boys-white-supremacist-group-law-enforcement-agencies>.

dangers to the Austin Pride Parade from Proud Boys. It identified the Proud Boys as associated with a “growing backlash against Pride Month [which] has emerged in the form of the Straight Pride movement,” noting that “on 28 June 2019, a Trans Pride parade event in Seattle, Washington was disrupted by the alt-right Proud Boys organization.”

71. Membership in the Proud Boys is considered grounds for firing a law enforcement officer. In 2018, a deputy in the Plaquemines Parish Sheriff’s Office was fired for publicly announcing his membership in the Proud Boys. The membership was found to be “negatively affect[ing] the public perception” of the agency and eroding the public’s trust in it.<sup>170</sup> The Clark County Sheriff’s Office in Clark County, WA, fired a deputy for wearing Proud Boys merchandise.<sup>171</sup> An officer in the Fresno Police Department was fired in April 2021 for participating in a Proud Boys counterdemonstration. Fresno Police Chief Paco Balderrama said at the time, “I stand by and reassert my prior comments in strongly disapproving of any police officer affiliating with hate groups.”<sup>172</sup>

*Proud Boys Violence on December 12, 2020*

72. The violence committed by Proud Boys members who came to Washington, D.C. on December 12, 2020, to contest the election result was more extensive than just the two attacks at Black churches. Police said the Proud Boys movement had amassed their largest gathering in Washington, D.C. that day and that 39 people were arrested for protest-related actions on the weekend of December 12. Police said in total four churches were vandalized. “These Proud Boys are avowed white nationalists and have been called to stand up against a fair and legal election,” Washington, D.C. Mayor Muriel E. Bowser said. “This is a symptom of the hateful

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<sup>170</sup> [https://www.nola.com/news/crime\\_police/article\\_62cd0ccb-b4ac-5e49-9661-532550f5aa26.html](https://www.nola.com/news/crime_police/article_62cd0ccb-b4ac-5e49-9661-532550f5aa26.html).

<sup>171</sup> <https://www.columbian.com/news/2018/jul/20/clark-county-sheriffs-deputy-fired-proud-boys-sweatshirt/>.

<sup>172</sup> <https://www.nbcnews.com/news/us-news/california-police-officer-fired-over-ties-proud-boys-extremist-group-n1263706>.

rhetoric, anti-science noise and people who refuse to accept the result of a fair American election.”<sup>173</sup>

73. Among the violence that day, members of the Proud Boys punched a Black woman on the 1500 block of K Street, attacked protestors in the middle of a crowd and repeatedly kicked them while they lay on the ground. They attacked multiple bystanders with weapons and threw them to the ground. While dozens of Proud Boys members rallied outside Harry’s Restaurant that night, Jeremy Bertino and a large crowd singled out and attacked a solitary Black bystander, Philip Johnson, trapping him against a wall and beating him until police intervened.<sup>174</sup> Another member of the Proud Boys attacked a counterprotester while someone simultaneously screamed, “Fucking Jew.” The incident was captured on video, which the Anti-Defamation League has reviewed.<sup>175</sup>

74. On January 4, 2021, Tarrío was arrested in Washington, D.C., on charges of destruction of property in relation to the events of December 12 and illegal possession of high-capacity firearms magazines.<sup>176</sup> He was banned from Washington, D.C.<sup>177</sup> and thus was not on hand during the storming of the Capitol on January 6, 2021. In her ruling banning Tarrío from Washington, D.C., Superior Court Magistrate Judge Renee Raymond pointed to Tarrío’s social media postings as the reason for keeping him out of Washington, D.C., in which Tarrío appeared to threaten more destructive acts. The December 12 attacks are described in more detail in Opinion 5 below.

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<sup>173</sup> [https://www.washingtonpost.com/local/public-safety/trump-rally-violence-proud-boys/2020/12/14/bf2f5826-3e26-11eb-8bc0-ae155bee4aff\\_story.html](https://www.washingtonpost.com/local/public-safety/trump-rally-violence-proud-boys/2020/12/14/bf2f5826-3e26-11eb-8bc0-ae155bee4aff_story.html).

<sup>174</sup> [https://www.washingtonpost.com/local/public-safety/enrique-tarrío-proud-boys-black-lives-matter-sign/2020/12/18/c056c05e-415a-11eb-8db8-395dedaaa036\\_story.html](https://www.washingtonpost.com/local/public-safety/enrique-tarrío-proud-boys-black-lives-matter-sign/2020/12/18/c056c05e-415a-11eb-8db8-395dedaaa036_story.html).

<sup>175</sup> <https://www.adl.org/blog/proud-boys-bigotry-is-on-full-display>.

<sup>176</sup> <https://www.forbes.com/sites/rachelsandler/2021/01/04/proud-boys-leader-enrique-tarrío-arrested-for-allegedly-burning-churchs-black-lives-matter-flag/?sh=6a2156575d6d>.

<sup>177</sup> [https://www.washingtonpost.com/local/public-safety/proud-boys-arrest-church-black-lives-matter/2021/01/05/18c58640-4f6a-11eb-83e3-322644d82356\\_story.html](https://www.washingtonpost.com/local/public-safety/proud-boys-arrest-church-black-lives-matter/2021/01/05/18c58640-4f6a-11eb-83e3-322644d82356_story.html).

*Proud Boys Played Key Role in Violent Capitol Insurrection*

75. The United States has indicted four leaders of the Proud Boys in connection with the January 6, 2021, Capitol attack for allegedly conspiring, including in discussions on encrypted messaging apps, to obstruct the certification of President Biden’s Electoral College victory. The indictment charges the defendants—Ethan Nordean, Joseph “Joe” Biggs, Zach Rehl and Charles Donohoe—with six counts, including obstruction of an official proceeding, obstruction of law enforcement, destruction of government property and conspiracy. The indictment lists Nordean as president of his local Proud Boy chapter in Washington state; Biggs as a Proud Boy member and organizer in Florida; Rehl as the president of a local chapter in Philadelphia; and Donohoe as the president of his local Proud Boy chapter in North Carolina.

76. The indictment indicates that the government believes it has sufficient evidence of close coordination among Proud Boys during the Capitol insurrection. In the government’s motion to revoke his pretrial release, information is included alleging Nordean was in charge of members of the group in Washington, D.C., that day. The motion described the high level of coordination that day: “Defendant and co-conspirators Joseph Biggs and Zack Rehl were at the head of the pack, as they led the group from the Washington Monument to the U.S. Capitol with the purpose of interfering with the Electoral College certification. Defendant’s leadership role in the surge forward and the group’s coordinated action to dismantle metal barriers reflects the results of the plan that he and the co-conspirators drew up. The photos and videos clearly show a series of intentional actions made without hesitation or regret—including video footage of Nordean personally dismantling a metal barrier that separated the crowd from Capitol Police

officers and the Capitol itself.”<sup>178</sup> At least 25 members or associates of the Proud Boys have been arrested for involvement in the January 6 Capitol insurrection.<sup>179</sup>

77. A magistrate judge in U.S. District Court for the District of Columbia has described the attack as “terrorism.” During a court hearing for Charles Donohue, U.S. Magistrate Judge G. Michael Harvey said, “The acts alleged in the indictment would meet, in my view, the statutory definition of a federal crime of terrorism,” adding that the attack “struck at the very heart of our democracy.”<sup>180</sup>

78. Though Tarrío was absent from Washington, D.C. that day, he played a key role in the days leading up to the events on January 6, 2021. Tarrío said on Parler that the Proud Boys would “turn out in record numbers on Jan 6<sup>th</sup>” referring to his members as “the most notorious group of extraordinary gentlemen.”<sup>181</sup> Tarrío and the Proud Boys’ elders chapter were instrumental in what unfolded that day, according to allegations made by prosecutors. According to court documents, a new “Ministry of Self-Defense” was described by one Proud Boy as a “special chapter” of the organization that was dedicated to planning for January 6. On December 29, 2020, Tarrío announced the leadership and structure of the “Ministry of Self-Defense,” which included himself, Ethan Nordean (also known as Rufio Panman, a Proud Boy organizer from Washington state and an elder in the group),<sup>182</sup> Joe Biggs (a Proud Boy organizer from Florida),<sup>183</sup> and Zach Rehl (leader of the organization’s Philadelphia chapter). Two other members of the

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<sup>178</sup> <https://www.vice.com/en/article/v7edp3/proud-boys-chats-reveal-how-they-coordinated-during-the-capitol-riot>; motion posted here: <https://www.justice.gov/usao-dc/case-multi-defendant/file/1377586/download>.

<sup>179</sup> <https://www.forbes.com/sites/melissaholzberg/2021/04/05/25th-man-affiliated-with-proud-boys-and-his-brother-indicted-by-doj-for-capitol-riot/?sh=242930172672>.

<sup>180</sup> <https://www.reuters.com/world/us/least-100-more-arrests-coming-us-capitol-riot-probe-prosecutors-2021-04-22/>.

<sup>181</sup> <https://www.bbc.com/news/world-us-canada-55540347>.

<sup>182</sup> <https://twitter.com/AsherLangton/status/1067605372234551297>.

<sup>183</sup> Prosecutors asserted that allowing Biggs out of prison prior to trial would lead to violence. “There is simply no adequate method to monitor [Biggs’] communication in such a way that would guard against future attacks by his followers,” prosecutors alleged. <https://www.npr.org/2021/04/09/985104612/conspiracy-charges-bring-proud-boys-history-of-violence-into-spotlight>.

“Ministry of Self-Defense” have not yet been identified by prosecutors. Prosecutors allege the Ministry held a video call to prepare for January 6 and discussed how the upcoming event would differ from other recent Proud Boy rallies in Washington, D.C.<sup>184</sup> They decided they would eschew their traditional polos in favor of clothing that would let them blend in with the crowd.<sup>185</sup>

79. A Proud Boy and Queens resident, Eduard Florea, threatened to bring “three cars full of armed patriots” to Washington in early January. Flores was charged by federal authorities with stockpiling military-style combat knives and more than 1,000 rifle rounds in his New York home. He was also charged with possessing ammunition as a convicted felon and denied bail after the FBI searched his Queens home and interviewed him about a series of threats he made on the social media platform Parler at the time of the deadly siege on the U.S. Capitol. In his posts, Florea suggested staging attacks in New York, calling the area, “target rich.”<sup>186</sup> Florea continued posting during the siege, writing, “the time for peace and civility is over...guns cleaned and loaded...we are just waiting for the word.”

80. According to prosecutors, leading up to the event, Proud Boy chats were filled with bellicose rhetoric hoping Trump supporters, referred to as “normies,” would “burn that city to ash today.” Another poster wrote “I will settle with seeing them smash some pigs to dust.” At one point, one of the leaders wrote “Storming the Capitol now” and urged others in the chat to “get there,” according to court filings. Just after the Capitol was breached, one Proud Boy directed a message to Tarrio, “I told you we should have rushed the police line on [December] 12th.”<sup>187</sup>

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<sup>184</sup> <https://www.vice.com/en/article/v7edp3/proud-boys-chats-reveal-how-they-coordinated-during-the-capitol-riot>.

<sup>185</sup> <https://www.vice.com/en/article/v7edp3/proud-boys-chats-reveal-how-they-coordinated-during-the-capitol-riot>.

<sup>186</sup> <https://www.nbcnewyork.com/news/local/crime-and-courts/fbi-proud-boys-fan-stockpiled-ammo-knives-in-ny-home/2830111/>; <https://gothamist.com/news/aspiring-proud-boy-plotted-armed-attack-target-rich-nyc-feds-say>.

<sup>187</sup> <https://www.vice.com/en/article/v7edp3/proud-boys-chats-reveal-how-they-coordinated-during-the-capitol-riot>.

Tarrio, who was not present on January 6 due to a prior arrest, said in a text message that day at 2:30 PM, “Make no mistake...we did this.”<sup>188</sup>

81. Court documents also raised questions about the relationship between top-ranking Proud Boys and Dominic Pezzola, a.k.a. Spazzo, a Proud Boy from Rochester, New York. Pezzola is facing conspiracy charges and was allegedly responsible for the first breach of the Capitol when he smashed through a window. Investigators said in January they found a thumb drive full of bomb making instructions when they searched his home. Proud Boy leaders have denied having anything to do with him. But Proud Boys “Ministry of Self-Defense” Telegram chats, which he was a member of, suggest otherwise.<sup>189</sup>

82. After the Capitol attack, some members of the Proud Boys celebrated the events. “I’m proud as fuck at what we accomplished yesterday,” Rehl wrote, according to prosecutors.<sup>190</sup> In a poll on January 11, just days of the insurrection, on the Proud Boys Uncensored Telegram channel, 75% of more than 10,000 supporters of the group voted that they now wanted “total war.”<sup>191</sup> Even so, Tarrio ordered a nationwide three-month stand down that angered Nordean. “They’re coming for you no matter what,” Nordean said in a chat. “Wake the hell up I’m not gonna be sitting on my ass waiting for the end.” Regardless of the stand down, Nordean helped coordinate a cabin trip for top-level Proud Boys after January 6 according to *Vice*, and wrote in a Telegram post that they would discuss changing their traditional uniform and other matters including six-month and one-year plans, secure vetting for prospective members, bulk armor deals, and the Ministry of Self-Defense.<sup>192</sup>

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<sup>188</sup> <https://www.vice.com/en/article/v7edp3/proud-boys-chats-reveal-how-they-coordinated-during-the-capitol-riot>.

<sup>189</sup> <https://www.vice.com/en/article/v7edp3/proud-boys-chats-reveal-how-they-coordinated-during-the-capitol-riot>.

<sup>190</sup> <https://www.vice.com/en/article/v7edp3/proud-boys-chats-reveal-how-they-coordinated-during-the-capitol-riot>.

<sup>191</sup> <https://www.joemygod.com/2021/01/proud-boys-followers-vote-for-total-war-in-poll/>.

<sup>192</sup> <https://www.vice.com/en/article/v7edp3/proud-boys-chats-reveal-how-they-coordinated-during-the-capitol-riot>.

**VII. OPINION 3: The Proud Boys’ attack on Metropolitan AME’s property have numerous features consistent with other white supremacist and white nationalist attacks on Black churches that have occurred throughout our nation’s history.**

83. I understand that on December 12, 2020, the Proud Boys coordinated and executed an attack on protesters in Washington, D.C., including supporters of the Black Lives Matter movement. As part of the attack, Proud Boys cornered a single Black bystander, Philip Johnson.<sup>193</sup> They also stole, tore down, and destroyed Black Lives Matter banners posted by two churches, Metropolitan AME and Asbury United Methodist. It is my opinion that these events were racially motivated given the group’s history of white supremacy and the context of the attack.

84. Proud Boys leader Enrique Tarrio admitted to burning one BLM sign. In a post on the social media site Parler, he made clear that Black Lives Matter was his target when he participated in the arson of Asbury’s BLM banner.<sup>194</sup> Tarrio said in an interview with *The Washington Post*, which his lawyer advised him against, that he would plead guilty for his actions, pay the church the cost of the banner and surrender to authorities if criminal charges were filed against him.<sup>195</sup>

85. Tarrio said he attacked the BLM sign because he believes the Black Lives Matter movement “has terrorized the citizens of this country.”<sup>196</sup>

86. This is consistent with white supremacist conduct more broadly, which targets important symbols, including religious institutions, in particular communities they are opposed to. The purpose of these attacks is to terrorize and subjugate the targeted community. Historically, this has included burning and other forms of attacks on churches, mosques,

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<sup>193</sup> Complaint ¶¶ 69-71.

<sup>194</sup> Complaint ¶ 91.

<sup>195</sup> [https://www.washingtonpost.com/local/public-safety/enrique-tarrio-proud-boys-black-lives-matter-sign/2020/12/18/c056c05e-415a-11eb-8db8-395dedaaa036\\_story.html](https://www.washingtonpost.com/local/public-safety/enrique-tarrio-proud-boys-black-lives-matter-sign/2020/12/18/c056c05e-415a-11eb-8db8-395dedaaa036_story.html).

<sup>196</sup> [https://www.washingtonpost.com/local/public-safety/enrique-tarrio-proud-boys-black-lives-matter-sign/2020/12/18/c056c05e-415a-11eb-8db8-395dedaaa036\\_story.html](https://www.washingtonpost.com/local/public-safety/enrique-tarrio-proud-boys-black-lives-matter-sign/2020/12/18/c056c05e-415a-11eb-8db8-395dedaaa036_story.html).

synagogues and other similar institutions. White supremacist groups such as the Proud Boys also engage in destruction and vandalism of signs and other property pertaining to the targeted communities and their institutions. The attacks on BLM signs and property hosted by historically Black churches by members of the Proud Boys fit the pattern of this violent, racist history.

87. Black churches have historically been key organizing and support spaces in the Black freedom struggle and have, because of their importance, long been targeted for racist attacks. These institutions represent Black autonomy, which was viewed as especially threatening during the Civil Rights Movement of the 1950s and 1960s. Churches were bombed and set on fire throughout the era, including most notoriously in 1963 when Klansmen bombed the 16<sup>th</sup> Street Baptist Church in Birmingham, AL, a central hub of the Civil Rights Movement, and killed four young girls. Other religious institutions were also attacked during the era if they were perceived to be part of the struggle for Black equality, such as the bombing of The Hebrew Benevolent Congregation Temple by white supremacists in Atlanta in 1958 because of Rabbi Jacob Rothschild's support of the Civil Rights Movement and his personal friendship with civil rights leader Martin Luther King Jr.<sup>197</sup>

88. These attacks continue up to the present day for substantially the same reasons. They include the arson by Klansmen in 1995 of the Macedonia Baptist Church,<sup>198</sup> the 2017 arson of the Victoria Islamic Center in Texas,<sup>199</sup> white supremacist Dylann Roof's 2015 massacre of nine parishioners at the Emanuel AME Church, and many other attacks.<sup>200</sup> Data starting in 1956, two years after the Supreme Court ended segregated schooling in *Brown v. Board*

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<sup>197</sup> [https://en.wikipedia.org/wiki/Hebrew\\_Benevolent\\_Congregation\\_Temple\\_bombing](https://en.wikipedia.org/wiki/Hebrew_Benevolent_Congregation_Temple_bombing).

<sup>198</sup> <https://www.splcenter.org/seeking-justice/case-docket/macedonia-v-christian-knights-ku-klux-klan>.

<sup>199</sup> <https://www.justice.gov/opa/pr/texas-man-sentenced-almost-25-years-hate-crime-burning-down-mosque-victoria-texas>.

<sup>200</sup> [https://en.wikipedia.org/wiki/List\\_of\\_attacks\\_against\\_African-American\\_churches](https://en.wikipedia.org/wiki/List_of_attacks_against_African-American_churches).

*of Education*, shows there have been at least 100 attacks on Black churches. Many have been relatively recent, including the burning of three Black churches in Louisiana in 2019.<sup>201</sup>

89. These violent actions were not confined to the civil rights movement of the 1950s and 1960s. There was an epidemic of racially motivated violence against Black churches in the 1990s. Most notoriously, the Macedonia Baptist Church and Mt. Zion African Methodist Episcopal Churches in South Carolina were burned down by Klansmen.<sup>202</sup> After at least 34 Black churches were burned, mostly in the rural South, then-President Bill Clinton labeled ending these arsons “a national priority”<sup>203</sup> in 1996 and the Department of Justice launched a civil rights investigation.<sup>204</sup> Hearings on the matter were held in Congress and a new law, the Church Arson Prevention Act of 1996, was passed to increase criminal penalties.<sup>205</sup> The Department of Justice established a National Church Arson Task Force to pursue the perpetrators of these crimes and many were prosecuted (it disbanded in 2000).<sup>206</sup>

90. As threats against elected officials, political candidates and election workers escalated in the aftermath of Trump’s refusal to concede the November 2020 election, Black churches have again been targeted. Ebenezer Baptist Church in Atlanta, where newly elected Senator Rev. Raphael Warnock ministered as senior pastor, was reportedly inundated with threats in the lead up to Georgia’s January 2020 senatorial runoff election. Martin Luther King Jr. was once the minister of the church. It is my opinion that these churches, including the ones the Proud Boys attacked on December 12, are being targeted because they represent the strength and

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<sup>201</sup> [https://www.huffpost.com/entry/there-have-been-at-least-100-attacks-on-black-churches-since-1956\\_n\\_5627d677e4b0bce347039ef6](https://www.huffpost.com/entry/there-have-been-at-least-100-attacks-on-black-churches-since-1956_n_5627d677e4b0bce347039ef6).

<sup>202</sup> <https://www.splcenter.org/fighting-hate/intelligence-report/1998/jury-decision-against-ku-klux-klan-makes-day-reckoning>.

<sup>203</sup> <https://www.hsdl.org/?abstract&id=1402>.

<sup>204</sup> <https://www.washingtonpost.com/wp-srv/national/longterm/churches/reaction.htm>.

<sup>205</sup> <https://www.justice.gov/sites/default/files/jmd/legacy/2014/06/03/hear-98-1996.pdf>.

<sup>206</sup> <https://www.justice.gov/crt/image-report-cover>.

autonomy Black community and the advancement of racial justice, which white supremacists seek to intimidate and silence.

**VIII. OPINION 4: The Proud Boys perceive the Black Lives Matter movement to be their enemy because it is antithetical to the Proud Boys' white supremacist ideology. The Proud Boys' contention that their beliefs are anti-communist rather than racist is, like many other hate actors in American history, a pretext to mask their support for white supremacy.**

91. The Proud Boys have denied being a white supremacist group and instead claim that when they attack groups such as Black Lives Matter, they are in fact opposing Marxism and communism. Based on my knowledge and experience, this explanation is pretextual and the real motivation for their activities is racial animus, misogyny, and opposition to multiculturalism and equal rights for all.

92. White supremacists often use opposition to communism or Marxism as a pretext to oppose movements for racial justice and to attempt to delegitimize and smear civil rights activists. In general, the white supremacist interpretation of communism includes the idea of equality among races, making it opposed and abhorrent to a movement that believes in a racial hierarchy with whites at the top. In prior eras, those defending racial segregation often used the cover of fighting communism to attack desegregation and to “protect the Southern way of life,” meaning Jim Crow.<sup>207</sup> The Klan claimed it was fighting communism in the 1930s in leaflets, while its predominant activities were actually to viciously attack Black people, Catholics and immigrants as anti-American.<sup>208</sup>

93. This dynamic played out most demonstratively in attacks on Martin Luther King Jr., whom many segregationists called a communist to undermine the legitimacy of his

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<sup>207</sup> [https://www.lib.usm.edu/legacy/spcol/exhibitions/anti-comm/civil\\_rights.html](https://www.lib.usm.edu/legacy/spcol/exhibitions/anti-comm/civil_rights.html).

<sup>208</sup> <https://www.thecrimson.com/article/1932/11/1/ku-klux-klan-distributes-anti-communist-leaflets/>.

pursuit of civil rights for Black people.<sup>209</sup> FBI Director J. Edgar Hoover specifically targeted King for surveillance as part of his infamous COINTELPRO operation using the excuse that King was associating with communists.<sup>210</sup> Up to this day, these same arguments attacking King are widely circulated by white supremacists. The Council of Conservative Citizens, a white supremacist group, produced a booklet in 2003, *Reparations for Slavery*, that alleged that King was a communist and left-wing agitator.<sup>211</sup> The neo-Nazi National Alliance produced a 1994 pamphlet, *The Beast as Saint*, that alleged the same.<sup>212</sup> The website martinlutherking.org, which is filled with defamatory content about King and owned by the same man who runs the white supremacist Stormfront.org, also accuses King of being a communist. In American history, there is thus a long history of white supremacists accusing those fighting for equality and civil rights for people of color of being “communist.”

94. Today, opposition to communism continues to serve as a well-known canard used by many white supremacist groups to hide their actual motives. For example, Anti-Communism Action, or “Anticom,” is a neo-Nazi group that has overlapping membership with other neo-Nazi groups like Atomwaffen Division and has participated in “white lives matter” rallies with other hate groups like the National Socialist Movement and Traditionalist Workers Party.<sup>213</sup> During the Charlottesville rallies, leaked Anticom messages showed they were in touch with Proud Boys at the event and some members wanted to join them.<sup>214</sup> Like the Proud Boys, Anticom’s colors are yellow and black. Also like the Proud Boys, Anticom has praised

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<sup>209</sup> [https://gazette.com/news/righteous-martin-luther-king-was-slandered-as-a-communist-david-ramsey/article\\_aeeb29ac-c3ad-11ea-956e-e7ccd4fb0784.html](https://gazette.com/news/righteous-martin-luther-king-was-slandered-as-a-communist-david-ramsey/article_aeeb29ac-c3ad-11ea-956e-e7ccd4fb0784.html).

<sup>210</sup> <https://kinginstitute.stanford.edu/encyclopedia/federal-bureau-investigation-fbi>.

<sup>211</sup> <https://web.archive.org/web/20070206022935/http://www.cofcc.org/foundation/reparations.htm>.

<sup>212</sup> [https://www.jrbooksonline.com/PDF\\_Books/BeastAsSaint.pdf](https://www.jrbooksonline.com/PDF_Books/BeastAsSaint.pdf).

<sup>213</sup> [https://en.wikipedia.org/wiki/Anti-Communist\\_Action](https://en.wikipedia.org/wiki/Anti-Communist_Action); <https://www.propublica.org/article/white-supremacists-share-bomb-making-materials-in-online-chats>.

<sup>214</sup> <https://t.co/KL2Q5Y71mz>; <https://t.co/uOgBSv05u1>; [https://twitter.com/UR\\_Ninja/status/1311394761224355842?s=20](https://twitter.com/UR_Ninja/status/1311394761224355842?s=20).

extrajudicial killings by South American military dictators like Augusto Pinochet.<sup>215</sup> This is a favorite trope of the Proud Boys as well, who wear t-shirts praising Pinochet and his death squads for throwing their supposedly communist detractors out of helicopters and into the ocean.<sup>216</sup> Popular clothing from the Proud Boys, sold on Tarrio's 1776 Shop website, features the text "Right Wing Death Squad" and "Free Helicopter Rides."<sup>217</sup> Accusations of communism have also been leveled against former members of these groups who are accused of betrayal, such as when the neo-Nazi Traditionalist Workers Party threw its leader Matt Heimbach out for being a "betrayal, traitor and a Communist."<sup>218</sup>

95. Members of the Proud Boys claim they are opposed to Black Lives Matter because it is communist. But their track record of white supremacy and racism is the real cause of their attacks on the racial justice movement, just as opposition to Black equality, not communism, was the reason for segregationist attacks calling Martin Luther King Jr. and other civil rights leaders "communists."

96. In the white supremacist publication *American Renaissance*, McInnes wrote in 2014 that he despised white liberals who subscribed to a "Marxist myth of ubiquitous equality" and who refused to acknowledge innate disparities between people of different races. In this context, Marxism is not described an alternative economic paradigm to replace the capitalist system, as it is commonly understood, but rather is another way of encapsulating the idea of equality among races. McInnes supported this notion using the long-discredited work of social scientist Charles Murray, whose 1994 book *The Bell Curve* connecting race and IQ tests has been

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<sup>215</sup> <http://www.newsweek.com/who-are-white-nationalist-groups-who-demonstrated-charlottesville-650162>.

<sup>216</sup> <https://theintercept.com/2021/02/04/pinochet-far-right-hoppean-snake/>.

<sup>217</sup> <https://1776.shop/?s=helicopter>; <https://1776.shop/?s=rwds>.

<sup>218</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/traditionalist-worker-party>.

criticized as racist.<sup>219</sup> This makes clear that when McInnes says he opposes “Marxism” what he actually means is he opposes racial equality. McInnes once sarcastically insisted he held out hope for the future of American race relations: “When we’re all forced to live side by side, we’ll quickly realize we’re incompatible, and agree to disagree. The blind utopians at *The New York Times* will be crushed and the rest of us realists will be dancing in the streets.”<sup>220</sup>

97. Other Proud Boys have mimed McInnes interpretation of communism. I have reviewed Joe Biggs’ *Biggs Report*<sup>221</sup> in which he posts the following: “[Black Lives Matter] is about Destroying all things America. This is about a communist fantasy hell bent on godlessness, sin and death.” “The truth is that Black Lives Don’t Matter [is] just Black lies used to cover [for] the real truth[:] A communist take over.” These claims to be rejecting communism when attacking Black Lives Matter ring hollow given the Proud Boys’ own words, posts and actions in support of white racial superiority.

98. The celebratory nature of the Proud Boys’ social media posts about their members burning the Black Lives Matter banner at one Black church and tearing down another at Metropolitan AME in Washington, D.C., on December 12, 2020, also belie their argument that they are fighting communism. This is effective propaganda for the group because Black Lives Matter is directly opposed to the group’s white supremacy. “How was your weekend? Ours was lit,” the Philadelphia chapter posted on Parler with an image of the burning banner, which earned praise from commenters. “Love it!!!” one wrote.<sup>222</sup>

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<sup>219</sup> <https://www.vox.com/2018/4/10/17182692/bell-curve-charles-murray-policy-wrong>.

<sup>220</sup> <https://www.splcenter.org/fighting-hate/extremist-files/group/proud-boys>.

<sup>221</sup> Joe Biggs, BLM Equals Communism, THE BIGGS REPORT (Aug. 24, 2020), <https://www.thebiggsreport.com/2020/08/blm-equals-communism/>.

<sup>222</sup> <https://www.splcenter.org/hatewatch/2020/12/16/proud-boys-destroy-churches-black-lives-matter-signs-during-protest-washington-dc>.

99. Other Proud Boys have falsely disparaged Black Lives Matter. Ethan Nordean wrote on October 2, 2020, on Parler, “Black Lives Matter and Antifa are terrorist organizations responsible for murders, assaults, harassment of decent people, and destruction of millions of dollars in property and small businesses.” On June 6, 2020, Joe Biggs described the Black Lives Matter acronym on Gab as “Burn, Loot, Murder.” On April 20, 2021, on the Proud Boys-run Telegram channel Western Chauvinist, the moderators posted, “The entire BLM movement and anti fascist movement pretends to give a fuck about black people but that’s merely a front for their anti white hatred. That’s what it all boils down to. They want us dead and replaced. If you’re still apprehensive about standing up for your people because you’re afraid of being called a nazi, you’re a traitor. These people are fucking evil and their agenda cannot be more obvious.”

100. A post on April 30, 2021, on the same channel read, “You’re told that Antifa and BLM are peaceful protesters even though your eyes see them looting, burning, and killing. Your representative government uses your tax dollars to prosecute you, not because you’ve committed a crime, but because your white ancestry makes the prospect of being controlled abhorrent; and on January 6, 2021 a group of mostly white Americans put the fear of God in to them. Here is the reality of what the country your forefathers carved from the side of a mountain looks like today. Unless you are a member of the elite media, political, or business class, or the child of a prominent Jew, being white is now grounds for your murder. Do you understand? They mean to kill you and your children for the crime of being white and exceptional.” On May 24, 2021, the channel posted this comment referring to last year’s racial justice protests with a slur, “The 2020 year long chimpout radicalized more people than any white nationalist ever could. I’ve spoken to many family members and friends who were once normies, but now they’re watching Europa. Thanks BLM and thanks Anti Fascists.” And on May 30, 2021, on his own Telegram

channel, Enrique's House of Propaganda, Tarrio posted, "Blaming Antifa is not enough...Antifa and BLM share the same communistic and "Whites are the devil" bullshit. They're both domestic terrorists and both deserve to get kicked in the mouth." In short, it is clear that any suggestion that Proud Boys' opposition to Black Lives Matter is based on purported anti-communism is nothing more than pretext for racism.

**IX. OPINION 5: The Proud Boys' December 12, 2020, attacks are a natural outcome of the Proud Boys' belief system, and were motivated by race hate targeting Black institutions. The activities that day were highly orchestrated like the Proud Boys' January 6, 2021, attack against the United States Capitol.**

101. On December 12, 2020, two Black churches in Washington, D.C., had their property destroyed by members of the Proud Boys. First, a Black Lives Matter banner displayed at Asbury United Methodist Church was burned and then a six-foot-long plastic Black Lives Matter sign at Metropolitan AME was torn to pieces.<sup>223</sup>

102. As the leader of the Proud Boys, Enrique Tarrio commanded the actions of his members in Washington, D.C. on December 12 and has admitted to being directly involved in burning the Ashbury banner.<sup>224</sup>

103. A video<sup>225</sup> widely circulated on social media shows several people dressed in Proud Boys attire destroying the Black Lives Matter sign in front of the Metropolitan AME church, which was founded in 1872 and hosted Frederick Douglass' 1895 funeral. Members of the Proud Boys can be seen climbing over a fence to tear down the Black Lives Matter sign.<sup>226</sup>

104. As noted above, Tarrio admitted to burning the Asbury Black Lives Matter sign in comments posted to Parler and Telegram and made clear that Black Lives Matter was his

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<sup>223</sup> <https://www.forbes.com/sites/rachelsandler/2021/01/04/proud-boys-leader-enrique-tarrio-arrested-for-allegedly-burning-churchs-black-lives-matter-flag/?sh=6a2156575d6d>.

<sup>224</sup> <https://www.forbes.com/sites/rachelsandler/2021/01/04/proud-boys-leader-enrique-tarrio-arrested-for-allegedly-burning-churchs-black-lives-matter-flag/?sh=6a2156575d6d>.

<sup>225</sup> <https://twitter.com/BGOnTheScene/status/1337968919286591488>.

<sup>226</sup> <https://www.bbc.com/news/world-us-canada-55540347>.

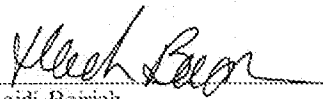
target when he participated in the arson of Asbury's BLM banner.<sup>227</sup> In a Parler post he wrote, "Pass me the lighter" and "I'll fucking do it again!" Tarrio said he attacked the sign because he believes the Black Lives Matter movement "has terrorized the citizens of this country."<sup>228</sup>

105. It is my opinion that Tarrio and members of the Proud Boys attacked these Black churches and their Black Lives Matter signs because they represent values of racial equality opposed by the Proud Boys, whose core tenets, as demonstrated above, are racist ideas of white superiority. It is no accident that Tarrio the Proud Boys targeted historic Black churches: as demonstrated throughout this report, it is central to their ideology to do so.

106. In conclusion, the events that took place on December 12, 2020, where BLM signs at historically Black churches were destroyed by Proud Boys members, including by the group's leader Enrique Tarrio, are the natural result of the fact that the organization is motivated by white supremacy and use violence to pursue its white supremacist aims. The activities on December 12 were coordinated and are consistent with the group's past activities in that they were highly organized and intentionally targeted sites associated with efforts to achieve Black equality. These attacks continue a long history of attacks on Black churches by white supremacists opposed to equality.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2021

  
Heidi Beirich

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<sup>227</sup> Complaint ¶ 91.

<sup>228</sup> [https://www.washingtonpost.com/local/public-safety/enrique-tarrio-pr...er-sign/2020/12/18/c056c05e-415a-11eb-8db8-395dedaa036\\_story.html](https://www.washingtonpost.com/local/public-safety/enrique-tarrio-pr...er-sign/2020/12/18/c056c05e-415a-11eb-8db8-395dedaa036_story.html).

## EXHIBIT A

## **Curriculum Vitae**

Heidi L. Beirich, Ph.D.

May 2021

## **Education**

Ph.D., Political Science, Purdue University, West Lafayette, IN, 1998

M.A., Political Science, San Diego State University, San Diego, CA, 1993

M.A., Economics, U.C. Riverside, Riverside, CA, 1990

B.A., International Development Studies, U.C. Berkeley, Berkeley, CA, 1989

## **Work Experience**

|                      |                                                                                                                   |
|----------------------|-------------------------------------------------------------------------------------------------------------------|
| Jan. 2020-present    | Co-Founder and VP for Strategy, Global Project Against Hate and Extremism (globalextremism.org; @globalextremism) |
| Jan. 2012-Dec. 2019  | Director, Intelligence Project, Southern Poverty Law Center                                                       |
| Oct. 2009-Jan. 2012  | Co-Director, Intelligence Project, Southern Poverty Law Center                                                    |
| July 2004-Oct. 2009  | Deputy Director, Intelligence Project, Southern Poverty Law Center                                                |
| Sept. 1999-July 2004 | Senior Writer, Intelligence Project, Southern Poverty Law Center                                                  |

## **Professional Affiliations**

Co-founder and co-chair, Change the Terms Coalition (approximately 60 organizations that work against online hate)

Advisory Board Member, International Network for Hate Studies, Ontario Tech University, Oshawa, Canada

Organizational Member, Christchurch Call Advisory Network, Formed by the governments of France and New Zealand

Organizational Member, International Network Against Cyberhate, Amsterdam, Netherlands

## **Congressional Testimony**

“Assessing the Threat from Accelerationists and Far-Right Militia Extremists,” Testimony before the House of Representatives Homeland Security Committee Intelligence and Counterterrorism Subcommittee, July 16, 2020

(<https://homeland.house.gov/imo/media/doc/Testimony%20-%20Beirich.pdf>)

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*The Role of the Constitutional Tribunal in Spanish Politics (1980-1995)*, Ph.D. dissertation, Purdue University, Dec. 1998.

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#### ***Served as primary author***

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 “A League of Their Own,” *Intelligence Report*, Summer 2000  
 “In the Lyons Den,” *Intelligence Report*, Summer 2000  
 “The Neo-Confederates,” *Intelligence Report*, Summer 2000  
 “Coloring Crime,” *Intelligence Report*, Summer 2000  
 “Neither Left Nor Right,” *Intelligence Report*, Winter 2000  
 “A Generation Under Siege,” *Intelligence Report*, Fall 1999

## **Presentations**

Presenter, “The January 6 Capitol Hill Siege and Extremism in the Military,” Program on Extremism at George Washington University and the Combating Terrorism Center at West Point, April 12, 2021.

Presenter, “Transnational White Supremacist Movements,” House Homeland Security Committee Staff Briefing, April 7, 2021.

Presenter, “Democratic Dictatorship: Trump, Facebook & The Global Rise of Far- Panelist, “Hate Had A Home Here,” James Madison College and MSU Student Senate, April 7, 2021.

Right Extremism,” Real Facebook Oversight Board, April 6, 2021.

Panelist, “Domestic Violent Extremism: Threats, Policies and New Approaches,” The Gerald R. Ford School of Public Policy, University of Michigan, March 29, 2021.

Panelist, “Pushing Back Against White Supremacy,” Social Justice Coalition, Santa Clara University School of Law, March 24, 2021.

Presenter, “White Supremacy & Cryptocurrency,” Private briefing for Facebooks’ Novi, March 18, 2021.

Panelist, “Forum on Transnational White Supremacist Terrorism,” Islam Unraveled, March 15, 2021.

Speaker, “Healing From Hate,” St. Mary’s College, South Bend, Ind., March 10, 2021.

“Transnational White Supremacy,” Private Briefing for Law Enforcement arranged by UK Home Office, March 4, 2021.

“International White Supremacy,” Purdue University Human Rights and Political Science Programs, Feb. 2, 2021.

Panelist, “An End and a Beginning?” Race Relations in the United States: The Trump Legacy and the Biden Presidency,” Edge Hill University Symposium, Jan. 19, 2021.

Speaker, “Facebook Now—Where is the Line?” Real Facebook Oversight Board Press Conference, Jan. 12, 2021.

Panelist, “Academia in Dialogue Forum: Rise of Far Right and Identity Politics: South-East European Experiences,” online forum by FES, SOE and IDESE, Nov. 30, 2020.

Panelist, “Nonprofits Challenging Islamophobia,” ARNOVA conference, online, Nov. 13, 2020.

Moderator, “Transnational White Supremacy,” International Network Against Cyberhate Annual Convening, Oct. 15, 2020.

“The Threat of Militias,” Real Facebook Oversight Board, Online Briefing, Oct. 15, 2020.

Convenor, “Right-Wing Antisemitism,” International Network Against Cyberhate (INACH), Online Briefing, Oct. 14, 2020.

Co-Convenor with Center for American Progress, “Building a National Policy Blueprint for Countering Violent White Supremacy: Anti-Hate and Technology”, virtual convening, September 22, 2020.

“Rooting Out White Supremacy in the Military,” KPBS panel, Sept. 3, 2020.

“The Extreme Right: Antisemitism and Terrorism in American and Europe,” Antisemitism Policy Trust (UK), Aug. 20, 2020.

“Hate and COVID-19,” Bard Center for the Study of Hate, Bard College, April 17, 2020.

“White \_\_\_\_\_: Naming Racism, Violence and Power,” Johns Hopkins University, Baltimore, Md., Feb. 21, 2020.

Multiple panels, Civil Rights X Tech Convening with Facebook, Atlanta, Ga., Sept. 26, 2019.

“Change the Terms: Approaches for Addressing a New Era of Online Hate,” RightsCon Tunis, Tunis, Tunisia, June 12, 2019.

Keynote Panel: “Perspectives on the Far-Right Insurgency: Latin America, Europe, and the U.S,” U.C. Berkeley Center for Right-Wing Studies, Berkeley, CA, April 25, 2019.

“Hate in America,” Shepard Symposium, University of Wyoming, Cheyenne, WY, April 12, 2019.

“The Ethics of Public Commemoration,” Georgia State University, Atlanta, GA, November 12, 2018.

“Hate Groups and Extremism,” San Mateo Bar Association, San Mateo, CA, October 2018.

“Reducing Hate Online,” Center for American Progress, Washington, D.C., Oct. 25, 2018.

“Life After Hate: Defeating White Supremacy,” Women in the World 2017 Summit, New York, NY, November 2017.

“Hate on the Rise—And What We Can Do To Stop It,” Aspen Ideas Festival, Aspen, CO, August 2017.

“White Supremacist Terrorism,” Duke University & Triangle Center on Terrorism and Homeland Security, Durham, NC, Feb. 22, 2107.

“The Growth of Hate Groups in America,” Friedrich Ebert Foundation, Washington, D.C., May 19, 2016.

“Extremist Groups in America,” Seattle PD Hate Crimes Conference, April 26, 2016.

“Racism, Violence & Democracy,” MIT, Cambridge, MA, Oct. 13, 2016.

“What is Violent Extremism: A Global and US Perspective,” Cleveland State University, Cleveland, OH, Oct. 6, 2016.

Panel Remarks, DiscoveryID release of “Hate in America,” Paley Center, New York, NY, Feb. 25, 2016.

Remarks to George Washington University-SPLC event on domestic terrorism hosting Assistant Attorney General John Carlin, Washington, D.C., Oct. 14, 2015.

“Hate and Extremism Today,” Blount Honors College, University of Alabama, Tuscaloosa, AL, April 6, 2015.

Series of presentations on extremism for academic network, American University, Washington, D.C., Feb. 20-21, 2015.

“The Rising Tide of Hate in America,” New College of Florida, Sarasota, FL., Feb. 19, 2015.

Remarks, DiscoveryID release “Hate in America,” Paley Center, New York, NY, Feb. 12, 2015.

Panel Remarks at release of “Welcome to Leith,” Sundance Film Festival, Park City, UT, Jan. 26, 2015.

“The Work of the SPLC: Battling Domestic Terrorists,” National Counterterrorism Center, Washington, DC, August 21, 2014

“Hate Crimes and the Law,” Pittsburgh Bar Association, Pittsburgh, Pa., April 11, 2013.

“The Rising Tide of Hate in America,” Blount Undergraduate Initiative, University of Alabama, Tuscaloosa, March 8, 2013.

“Hate in America,” University of Tennessee, Chattanooga, March 27, 2013.

“Hate in the United States,” Middle Tennessee State University, Murphreesboro, Tenn., October 31, 2012.

“The Rising Tide of Hate in America,” White Privilege Conference, Albuquerque, N.M., March 29, 2012.

“Hate Crimes Workshop,” NAACP Southeast Regional Conference, Raleigh, N.C., March 23, 2012.

“The Rising Tide of Intolerance in America,” Central Wyoming College, Riverton, Wyo., Feb. 27, 2012.

“The Neo-Confederate Movement: Its History, Ideology and Impact on American Society,” Alabama University at Montgomery, Ala., Feb. 11, 2012

“The Ideology Foundations of HB5 6,” Public Forum on HB 56, Alabama’s Immigration Law, University of Alabama, Birmingham, Ala., Feb. 9, 2011.

“Defusing Hate,” A U.S.-European Best Practices Exchange on Promoting Social Cohesion through Broadcast Media,” Meridian International Center, Washington, D.C., November 7, 2011.

“The South and the Neo-Confederate Hate Movement,” Mid-South Sociological Association, Plenary Panel, Little Rock, Ark., Oct. 28, 2011.

“Hate Groups and Hate Violence,” Stephen F. Austin University, Nacogdoches, Texas, October 13, 2011

“The Rising Tide of Hate Crimes and Domestic Terrorism,” Excellence in Journalism Conference, New Orleans, La., Sept. 26, 2011

“The Sovereign Citizens Movement,” Women in Federal Law Enforcement Conference, Long Beach, Calif., June 22, 2011.

“Hate Crimes On Campus,” Association of Campus Police Officers, June 18, 2011.

“The Rising Tide of Hate in America,” Wyoming Democratic Women’s Forum, Casper College, Casper, Wyo., April 2, 2011.

“Combating Hate in America,” NAACP Southeast Conference, Montgomery, Ala., March 26, 2011.

“Hate in America,” Blount Undergraduate Special Initiative, University of Alabama, Tuscaloosa, March 7, 2011.

“Neo-Confederacy and Violence in the Southern Experience,” Center for a Better South, Little Rock, Ark., Nov. 13, 2010.

“American Extremism,” Shanahan Keynote Speaker, Journalism and Women’s Symposium, Tapatio Springs, Texas, Oct. 23, 2009.

“The Immigration Backlash,” Nebraskans for Peace, Omaha, Neb., Oct. 16, 2010.

“How the Southern Poverty Law Center Combats Hate,” Blount Undergraduate Special Initiative, University of Alabama, Tuscaloosa, March 8, 2010.

“Hate in Suffolk County: A Southern Poverty Law Center Special Report,” Touro Law School, Islip, N.Y., Dec. 2, 2009.

“Hate in Suffolk County: A Southern Poverty Law Center Special Report,” ACLU Suffolk County, Stony Brook, N.Y., Nov. 14, 2009.

“Hate in Suffolk County: A Southern Poverty Law Center Special Report,” Stony Brook University, Stony Brook, N.Y., Oct. 13, 2009.

“Hate in America,” Keynote Speech, Cecil College, Cecil, Maryland, Nov. 11, 2009.

Multiple lectures on hate groups in the U.S. including a keynote, “The History of Hate in America,” Hampden-Sydney College, Hampden-Sydney, Va., Oct. 21, 2009.

“The Specter of Hate in America and how that affects Psychologists and Other Mental Health Professionals,” Mental Health Systems, Inc., San Diego, CA, Sept. 17, 2009.

“The Modern Day Hate Movement,” 45<sup>th</sup> Anniversary Celebration of the FBI’s Community Relations Service, The National Museum of the American Indian, Washington, DC, Aug. 28, 2009.

Several speaking engagements in Phoenix on hate groups including a town hall and at press briefing. At the invitation of Phoenix Mayor Phil Gordon, Phoenix, AZ, August 12, 2009.

“Mainstreaming Extremism: A Media Matters Panel,” National Press Club, Washington, DC, June 18, 2009.

“Countering Extremism,” Anti-Defamation League, Washington, DC, June 25, 2009.

“Battling Hate: The Tactics and Strategies of the SPLC,” Bloomsburg University, Bloomsburg, PA, April 16, 2009.

“Hate in America,” Blount Undergraduate Initiative, University of Alabama, Tuscaloosa, March

30, 2009.

"The Nativists," Progressive Caucus Staff Briefing, Washington, DC, Feb. 19, 2009.

"Ending Hate in America," Keynote Speaker, The 21<sup>st</sup> Annual All People's Breakfast (MLK, Jr., celebration), San Diego, Calif., Jan. 19, 2009.

"The Battle Against Hate Groups: Focus on Selma," Keynote Speaker, Southern Christian Leadership Conference "Stop the Hate" event, August 17, 2008.

"The Anti-Immigrant Movement," Keynote Speaker, American Immigration Lawyers Association National Conference for Up and Coming Leaders, Washington, DC, August 4, 2008.

"Extremists from the Fringe," Presentation, Annual German America Conference, Simon Wiesenthal Center, New York, N.Y., June 25, 2008.

"Hate Groups in the Anti-Immigrant Movement," Keynote Speech, Unite to Fight Hate Conference, University of San Diego, San Diego, Calif., June 5, 2008.

"Campus Forum on Hate Speech, Hate Crime, and Far Right Movements," Panel member, Cal State University Long Beach, Long Beach, Calif., April 14, 2008

"Why Do We Blame Immigrants for Everything?" Sole Presenter, MAFO National Farmworker Conference, Sacramento, Calif., April 7, 2008

LULAC Congressional Briefing, Panel of Experts, "Violence Against Immigrants," Washington, DC, Feb. 27, 2008.

"Anti-Immigrant Hate Groups," For Immigrant Justice Project and EEOC Specialists, Montgomery, Ala., Jan. 31, 2008.

"Hate Groups in America," Keynote Speech, MLK Day Celebration, Yavapai College, Prescott, AZ, Jan. 21, 2008.

"The Radical Traditionalist Catholic Movement," Keynote Speech, Friedrich-Ebert Foundation, Berlin, Germany, June 21, 2007.

"Hate in the United States," Tuskegee University, Tuskegee, Ala., April 18, 2007.

"The Anti-Immigrant Movement," Canadian American Law Enforcement Organization, Niagara Falls, Canada, June 22, 2006.

Participant in National Institute of Justice Invite-Only Roundtable, "How Can We Better Track Hate Crimes," National Institute of Justice Special Meeting, Toronto, Canada, Nov. 15, 2005.

"Anti-Immigrant Hate Groups," Hispanic Caucus Institute, Washington, DC, Sept. 12, 2005

"Hate Crime: What It Is and What Do We Know?," Panelist, Special Department of Justice Panel, DOJ's Project Safe Neighborhoods, Washington, D.C., July 18-20, 2005.

"The Racist Take Over of the Sons of Confederate Veterans," Community Newspapers, Inc., Keynote Luncheon Speech, Athens, Geo., April 15, 2005.

"Identity Politics, Cultural Memory and the Neo-Confederate Movement in the United States," Special panel session, American Association of Geographers, Denver, Colo., April 6, 2005.

"Into the Mainstream: How the Neo-Confederates and other extremists are affecting mainstream American politics," Friedrich-Ebert Foundation, Berlin, Germany, Feb. 25, 2005.

"Holocaust Denial and White Supremacy," North Carolina Center for the Advancement of Teaching, Cullowhee, N.C., Feb. 3-5, 2005

"Museums in the Malestrom: Confronting the Course and Content of Special Interest Demands in Museums," Southeastern Museums Conference, Winston-Salem, NC, Oct. 19-23, 2004.

"The Anti-Immigrant Movement's Political Impact," National Convention, American Immigration Lawyers Association, Philadelphia, Penn., June 11 & 12, 2004.

"Anti-Immigrant Extremists," Keynote Speaker, California Chapter, American Association of Immigration Lawyers, San Diego, Calif., November 15, 2003.

“The Neo-Confederate Movement,” American Political Science Association, Philadelphia, Pa., August 30, 2003.

“The Anti-Immigrant Movement,” Keynote Speaker, American Association of Immigration Lawyers National Conference, Washington, DC, August 1, 2003.

“Anti-Immigrant Hate Groups,” Latino Summit, Atlanta, Geo., May 20, 2003.

“The Anti-Immigration Movement in the US,” Right-Wing Extremism in a Transatlantic Perspective, International Conference on Extremism hosted by the Friedrich Ebert Foundation and the Southern Poverty Law Center, Montgomery, Ala., April 29-May 1, 2003

“Anti-Immigrant Hate Groups,” Panel of Experts, American Association of University Women, Kennesaw State University, Kennesaw, Geo., January 11, 2003

“International Radical Race Movements,” Chair & Presenter, American Political Science Association, Boston, Mass., August 31, 2002.

“Fighting the International neo-Nazi Nexus,” Zentrum fur Demokratisches Kultur & Anne Frank Haus, Berlin, April 29-May 3, 2002.

“The International neo-Nazi Nexus,” Anti-Defamation League Special Conference on International Right-Wing Movements, New York, March 18-22, 2002.

“Rooting Out Racism and Hate: The International Work of the Southern Poverty Law Center,” Invited Speaker, International Affairs Program, Trinity College, Washington, DC, Nov. 1, 2001.

Instructor on Hate Groups, “Reporting on Race Relations,” Poynter Institute Seminar, September 9-14, 2001.

“Competitive Intelligence Uses of the Southern Poverty Law Center,” Featured Speaker, Lexis-Nexis, Washington, DC, July 26, 2001.

“Anti-Immigration Hate Groups: Overview,” Invited Speaker, Intelligence Division, Immigration and Naturalization Service, September 14, 2000.

## **APPENDIX 1: Additional Examples of Proud Boys white supremacist and extremist ideas**

In addition to the examples detailed in my report, below are further examples of white supremacist content posted and/or celebrated by Proud Boys on various social media accounts and forums. This list is only a sampling and not the complete universe of white supremacist Proud Boys content. Along with the material already presented, these examples further reinforce that the Proud Boys are inherently white supremacist.

### **White Supremacist Content on Instagram, Facebook and Twitter**

1. Instagram user @ofashandcinder posted about his Proud Boys membership.

In fewer than three months in 2017, he went from enthusiastically discussing the Proud Boys to attending a meeting with Holocaust denier David Irving, posting about Adolf Hitler's *Mein Kampf*, and ultimately joining the white nationalist organization Identity Evropa (IE) while posting photographs of himself with its leader, Nathan Damigo.<sup>229</sup>

2. On July 19, 2021, a writer at *Proud Boys Magazine*, Franklin Wright, liked a Twitter post and added a comment that indicated he was fine with anti-Semitic views. "Well, he's from my hometown of Montclair, NJ—might not share his antisemitism, can't exactly say I blame him."<sup>230</sup>

3. Facebook pages for Proud Boy chapters in Florida have featured anti-Semitic Holocaust denial content, including a meme implying the number of those who died during the Holocaust was simply invented.<sup>231</sup>

### **White Supremacist Content on Telegram**

Telegram is instant messaging software often used by white supremacist groups because it is largely unregulated for hate speech. There are several Telegram channels associated with the group, including national, chapter level and personal channels.

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<sup>229</sup> <https://www.splcenter.org/hatewatch/2017/08/10/do-you-want-bigots-gavin-because-how-you-get-bigots>.

<sup>230</sup> <https://www.splcenter.org/hatewatch/2017/08/10/do-you-want-bigots-gavin-because-how-you-get-bigots>.

<sup>231</sup> <https://www.vox.com/2018/10/15/17978358/proud-boys-trump-biden-debate-violence>.

4. One Telegram channel associated with the Proud Boys has over 45,000 members and consistently shares content which is explicitly linked with white supremacy and the neo-fascist ideology Third Positionism.<sup>232</sup>

5. A member of the Proud Boys known as “Hammy” ran the now deleted Telegram channel “Hammy’s Cesspool of Bullshit” where he posted white supremacist memes, calls for violence against journalists and minorities, and self-portraits where he posed in skull masks and with Confederate flags. “Hammy” was once a candidate for elder on the Proud Boys’ ruling council.<sup>233</sup>

6. Another Telegram account associated with the Proud Boys, “Proud Boys Uncensored,” which has had more than 40,000 subscribers, regularly reposts content from white supremacist outlets like National Justice, American Renaissance and Vdare.com.<sup>234</sup> The channel said of Vdare on August 11, 2020, “VDARE is consistently strong and principled in their analysis of American politics.”

7. The Proud Boys Uncensored Channel, reportedly run by the head of the New Hampshire chapter Todd M. Clark,<sup>235</sup> frequently posts racist material.

- i. On August 3, 2020, the channel advertised a racist White Lives Matter event. They also posted this: “You have to look at the positives in life. With no police around anymore all the black criminals will kill each other off within the next year or two.”
- ii. On Aug. 21, 2020, the channel posted, “It doesn’t matter if Trump or Biden wins, we are destined for another civil war. American society is headed for a collapse. Not because of Trump and not because of Biden. We are headed for a collapse because multiculturalism and

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<sup>232</sup> Marc-Andre Argentino, Blyth Crawford, Florence Keen and Hannah Rose, “Far From Gone: The Evolution of Extremism in the First 100 Days of the Biden Administration,” The International Centre for the Study of Radicalisation, 2021.

<sup>233</sup> <https://www.adl.org/blog/proud-boys-bigotry-is-on-full-display>.

<sup>234</sup> <https://www.splcenter.org/hatewatch/2020/12/16/proud-boys-destroy-churches-black-lives-matter-signs-during-protest-washington-dc>.

<sup>235</sup> <https://www.rightwingwatch.org/post/proud-boys-continue-to-incite-violence-in-the-wake-of-capitol-insurrection/>.

diversity are not our strength. Democrats and GOP traitors have flooded our homelands with migrants who hate our way of life. Forcing all cultures to live in 1 place is a recipe for disaster. It was always destined to fail. The only way forward is to embrace the struggle and prepare to fight for your nation. Don't swallow the black pill. We will win."

8. On February 7, 2021, the Proud Boys Uncensored Telegram channel rebranded to "Western Chauvinist." In announcing the change, the moderators, who identified as Proud Boys, said they wanted to focus on "ultranationalism" and "reviving the spirit of the European man." The channel has posted many pieces of white supremacist content, including some from the racist White Lives Matter channel, and refers repeatedly to Black people and Black Lives Matter activists as "parasites."

- i. On April 21, 2021, the Western Chauvinist forwarded a message from "Warren Balogh NJP" reading, "Ashli Babbitt was killed [during the Capitol insurrection] because she was White, because she was part of a movement that was overwhelmingly White, and was moved, whether consciously or unconsciously, by the impulse to defend America from the encirclement and slow destruction planned for us by our enemies."
- ii. On April 24, 2021, a "White Lives Matter Official" post was reposted to the channel reading, "Your enemies are calling for your genocide...It's time to become racial. No democrats, no republicans – just White People."
- iii. On April 24, 2021, the channel forwarded a message with an attached video that read, "This video was created to highlight just a few of the atrocities blacks have committed against White people. It is heartbreaking to see so many of our people brutally tortured and slain over the years, but it needs to be seen...By acknowledging the suffering of our people we hope to stir the hearts of young European men to action. White people are being victimized in their own homelands, it's time we take back control." The next post read, "The prevalence of black Americans is a greater predictor of violent crimes than the prevalence of poverty...Black Americans who are in the top income bracket of the country are more likely to commit violent crime than white Americans who are in the lowest income bracket."
- iv. On April 24, 2021, Western Chauvinist posted this, "TAKING BACK OUR HOMELANDS: In order to begin to reclaim our soil, we need 2 things: ACTION - join a nationalist/right wing/fascist/NS political action group. We need active clubs and active individuals promoting our cause as often as possible. 2. UNITY - No more brother wars. We are all contributing in our own ways, though we take

different paths the struggle is the same. We must restrain ourselves from engaging in personal or unnecessary ideological beefs with our brothers, and unite in the common struggle to reclaim our people's soil from the traitors and invaders. We at The Western Chauvinist are resolved to do our part to restore our people to glory, we ask only that you do the same. To all the parasites that openly proclaim your hatred for us, know that it was YOU who made us. You're the ones who woke us up from the fever dream of Jewish capitalism and endless degeneracy, to a more fulfilling way of life. We hope everyone watches this video and experiences everything we did creating it. There is hope for all of us, and with your dedication we will have our home again. @TheWesternChauvinist." The post then suggested other white supremacist groups to join including: the neo-Nazi Rise Above Movement, the neo-Nazi National Socialist Network, the white nationalist Patriot Front and the neo-Nazi Nordic Resistance Movement, which is banned in Finland.

- v. On April 26, 2021, the Western Chauvinist posted a video with the caption, "This a long but necessary video for our people to watch. It explains what is happening in Australia and in all other white western nations. Politicians are force feeding multiculturalism and immigration down our throats and legally punishing anyone who speaks out against it. In the United States, Europe, and Australia, white men are being arrested for standing up to this evil and corrupt government. It may be discouraging, but do not lose faith. The global system is in panic mode because millions of whites are realizing that their governments are purposely replacing them."
- vi. On April 27, 2021, the channel reposted a piece from the "White Lives Matter Official" channel. It depicted a poster with a white family with four children and the words "Stop White Replacement." It also read, "The year is 2021 and the vast majority of White People not only aren't aware of the war waged against them – but also are completely kept at bay from the truth: that we are currently only ~8% of world population, and are set to become absolute minorities in our own countries in 20 years. What people ignore though is that BY AGE GROUP, White Children are ALREADY minorities in almost all White Western Nations. TODAY. Any moment you publicly spend talking about anything else other than White Replacement is a moment when you are burdening the future of our Children."
- vii. On May 2, 2021, a post from "AdolfLitler" read, "we are seeing a massive upsurge in anti white attacks and murders here in the US thanks to this BLM monkey shit, and Biden wants to do the same with our guns. In 10 years time, America will look like present day South Africa."
- viii. Also on May 2, 2021, in response to a post about Israel, the channel posted, "It is your duty to remove anti-white material and oppose anti-white operatives wherever they are."

- ix. On May 4, 2021, a post forwarded from “Jaz Searby’s HARD KNOCKS COMBAT” channel read, “White Man—Once you become aware of the great replacement and the blatant attack on white culture it become your duty to fight...Showing strength and honor will encourage those around you to do the same. Anything less is treachery to your kin and death to your race.”
- x. On June 1, 2021, a post read, “Never forget that YOU are the descendant of men who refused to be ruled. Find your spirit because everything you stay quiet to protect was paid for by the blood of your folk.”
- xi. On June 2, 2021, the channel ran this post, “If you’re a black who has been pondering why your people end up in jail or murdered at such a high rate, you need to face the facts. No doubt you’ve blamed it on ‘systemic racism’ at some point, but did you ever once consider that it might be the way you people act like sub-human fuckin animals?”
- xii. Also on June 2, 2021, a post on the channel from “moo moo cow” read “(5 years ago Adolf Hitler said that the J\*ws want to destroy the European race. He was crazy lol. In other news, J\*\*ish organizations around the world are working to flood to European countries with Africans and censor any opposition to their agenda.” The reply to this by “The Western Chauvinist” was, “SUPER relevant to this shit day today. Fuck n\*\*\*\*\*.”
- xiii. Also on June 2, 2021, the channel posted, “if you’re a black who has been pondering why your people end up in jail or murdered at such a high rate, you need to face the facts. No...We always laugh when we see a black talking about how they want to live in white areas with good schools and safe streets. They do not seem to realize that if they did live there the schools would no longer be good because of their low IQ offspring and the streets would be unsafe because they would bring their parasitic ways with them. Your neighborhoods are warzones because YOU and your people live there. You can’t relocate away from your disgusting culture. It is in your nature to behave like savages.”

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

**METROPOLITAN AFRICAN METHODIST  
EPISCOPAL CHURCH,**

**Plaintiff,**

**v.**

**PROUD BOYS INTERNATIONAL, L.L.C.,  
ENRIQUE TARRIO, JOHN DOES #1-8,**

**Defendants.**

**No. 2021 CA 000004 B  
Judge Heidi M. Pasichow  
Next Court Date: Jun. 25,  
2021, 9:30 AM  
Event: Scheduling  
Conference**

**[PROPOSED] ORDER AND DEFAULT JUDGMENT**

Upon consideration of Metropolitan African Methodist Episcopal Church's ("Metropolitan AME") Motion for Ex Parte Hearing and Entry of Default Judgment and Injunctive Relief against Defendant Proud Boys International, LLC ("PBI"), under D.C. Superior Court Rule 55(b)(2), and after considering the arguments, authorities, and supporting documents, and the evidence proffered at an Ex Parte Proof Hearing on \_\_\_\_\_ 2021, the Court finds as follows:

1. PBI was served with process on January 6, 2021, through personal service on Jason L. Van Dyke, then its sole registered service agent. Mr. Van Dyke has advised the Court that he resigned as PBI's registered service agent on February 5, 2021.
2. Metropolitan AME served a copy of the (i) Complaint, (ii) Motion for Ex Parte Hearing and Entry of Default Judgment and Injunctive Relief, (iii) Memorandum of Points and Authorities and (iv) Proposed Order and Default Judgment on Defendant Enrique Tarrio by U.S. mail to his last known address, and on Defendant PBI by U.S. mail addressed to Enrique Tarrio as its Chairman, pursuant to Texas Rule of Civ. Proc. 29 and to the Secretary of State of Texas pursuant to Tex. Bus. Org. Code Ann. § 5.251.
3. Defendant is a limited liability company, and thus is not a minor, incompetent person, and not in the military.
4. On April 9, 2021, this Court entered default as to PBI pursuant to D.C. Superior Court Rule 55 because PBI did not answer or respond to the Complaint within the 21-day period prescribed by D.C. Superior Court Rule 12(a)(1)(A).
5. Metropolitan AME has adequately pleaded each of its claims against PBI for conspiracy with respect to violation of the D.C. Bias-Related Crimes Act (Count