

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUÑIZ,  
MARCUS MARTIN, NATALIE ROMERO,  
CHELSEA ALVARADO, JOHN DOE, and  
THOMAS BAKER,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOTT KLINE a/k/a ELI MOSLEY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, LOYAL WHITE KNIGHTS  
OF THE KU KLUX KLAN, and EAST  
COAST KNIGHTS OF THE KU KLUX  
KLAN a/k/a EAST COAST KNIGHTS OF  
THE TRUE INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**PLAINTIFFS’ RESPONSE TO THE COURT’S JANUARY 8, 2020, ORDER  
REGARDING DEFENDANT ELLIOTT KLINE A/K/A ELI MOSLEY**

As directed by the Court's January 8, 2020, Order, Plaintiffs respectfully submit this Response to "address[] any steps Kline has taken to either purge himself of contempt or any such additional measures or sanctions sought by Plaintiffs stemming from Kline's contumacy." Order at 4, Jan. 8, 2020, ECF No. 634. As the Court knows, Kline has repeatedly lied to the Court, violated Court orders, and ignored his discovery obligations. However, despite being held in and still today remaining in contempt of Court, Kline has done nothing since his release from custody to bring himself into compliance. Kline cannot be permitted to simply opt out of this litigation at Plaintiffs' expense. Yet it is clear that civil contempt sanctions cannot compel his compliance. Nevertheless, the prejudice Kline's noncompliance has caused can still be remedied by evidentiary sanctions. Plaintiffs respectfully request that the Court grant Plaintiffs' December 6, 2019, Motion for Evidentiary Sanctions, ECF No. 601 ("Second Sanctions Motion"), and April 3, 2019, Motion for Sanctions, ECF No. 457 ("First Sanctions Motion"), including granting Plaintiffs' request for an adverse inference instruction, to address Kline's flagrant disobedience and remedy the prejudice Plaintiffs have suffered.

**I. Kline Has Failed to Take Any Steps toward Purging Himself of Contempt**

Since Kline's release from custody on January 8, 2020, he has taken no steps to purge himself of contempt. In its Order, the Court clearly explained that, to purge his contempt, Kline must at least "demonstrate[] that he has responded 'fully and completely' to Plaintiffs' discovery requests" and "that he has turned over or provided access to any and all potentially relevant e-mail and social media accounts." Order at 4, ECF No. 634. Despite the Court's instructions, neither Plaintiffs nor the third-party discovery vendor has received a single communication from Kline. Indeed, Kline appears to have again disappeared from the litigation altogether.

*First*, Kline did not respond to Plaintiffs’ January 8, 2020, Response showing that Kline had lied about the CvilleReports@gmail.com email address apparently used by Kline in 2017 and withheld from Plaintiffs for the entirety of this litigation. *See generally* Pls.’ Resp. to Def. Elliott Kline a/k/a Eli Mosley, Jan. 8, 2020, ECF No. 631. As the Court knows, Kline had claimed that “this account is not one that [he] had access to” and that he could not use his phone number and other email addresses to recover the credentials. *See* Kline Resp. at 1, Jan. 7, 2020, ECF No. 625. But Plaintiffs’ Response provided compelling evidence that Kline had lied, and that the CvilleReports@gmail.com account *was* associated with Kline’s phone number and email address. *See* Pls.’ Resp. at 3–4, ECF No. 631. Kline simply never responded. This failure to respond is particularly egregious because it appears that the account was used to obtain “evidence” responsive to Plaintiffs’ discovery requests. *See id.* at 2–3.

Kline also did not respond to Plaintiffs’ request in their January 8, 2020, Response for immediate access to documents collected by the third-party discovery vendor. *See* Pls.’ Resp. 5–7, ECF No. 631. Indeed, the Court noted, in granting Plaintiffs’ request, that it had “afforded Kline the opportunity to respond,” but that Kline had failed to do so, and that Kline has a “track-record of failing to fulfill his discovery obligations in a timely manner, and unless and until forced to do so by court order.” Order at 2, Jan. 22, 2020, ECF No. 638.

*Second*, Kline did not respond to Plaintiffs’ Second Sanctions Motion by the deadline of January 21, 2020, despite the Court’s clear invitation to “**Kline** and any other defendant wishing to be heard” to file a response by that date. Order at 1, Jan. 7, 2020, ECF No. 622 (emphasis added).

*Third*, Kline has ignored communications from the third-party discovery vendor—sent to three email addresses that Kline has acknowledged using—asking Kline to review reports of data

collected from his phone and email account, so that the vendor could proceed with enabling Kline to review and produce his documents to Plaintiffs. *See Exhibit A.*

In sum, Kline has been held and remains in civil contempt after multiple hearings and opportunities to purge himself of contempt; he has incurred daily fines amounting to almost \$6,000; and he has served time in jail for contempt. Nonetheless, Kline refuses to come into compliance with the Court's discovery orders. Discovery has now been ongoing for almost two years. Indeed, the Court noted that it has already "spent more time on [this] discovery issue than on all the other cases" it has had in over twenty years. Hr'g Tr. at 31–32, Jan. 6, 2020, ECF No. 632. However, as Plaintiffs explained, "this is not the end of [Kline's] discovery obligations. This is just the beginning, and [Plaintiffs are] incredibly concerned that we're going to continue to have to come down and appear before [the Court] at every step of the way over the course of the next five to six months as Mr. Kline fights tooth and nail to do what he is required to do under the federal rules." *Id.* at 37. Plaintiffs' concern of Kline's continued intransigence appears to have been justified: Kline has done nothing to purge his contempt since his release from jail. Instead, he has disappeared. As Plaintiffs stated at the January 8 hearing, "[e]nough is enough." *Id.*

## **II. Kline's Stonewalling Warrants Adverse Inferences**

Kline's disobedience of Court orders, refusal to participate in discovery, and failure to preserve and provide access to critical evidence warrant adverse inferences in order to remedy the prejudice Plaintiffs have suffered, as described fully in the First and Second Sanctions Motions.<sup>1</sup>

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<sup>1</sup> In its January 8 Order, the Court stated that it intended to "also consider whether Elliott Kline should be referred to the U.S. Attorney's Office for potential initiation of criminal contempt proceedings, as a result of his contemptuous conduct to date." Order at 4, ECF No. 634. It is within the Court's discretion to make such a referral where a contemnor's compliance cannot be obtained through civil contempt sanctions. *See Yates v. United States*, 355 U.S. 66, 75 (1957); *Cascade Capital, LLC v. DRS Processing LLC*, No. 3:1-7-CV-00470 RJC-DSC, 2019 WL 5468635, at \*5 (W.D.N.C. Oct. 24, 2019).

Even if Kline were to finally purge himself of contempt—and even though the Court has granted Plaintiffs’ request for certain discovery measures, *see* Order, ECF No. 634—it is highly unlikely that Plaintiffs will ever obtain even close to full discovery of Kline’s documents. *See* Second Sanctions Motion 6. Specifically, and as fully explained in the Second Sanctions Motion, Kline has admitted that he failed to preserve documents; he used “burner” email address that he can no longer access or remember; the integrity of Kline’s devices is highly questionable; and evidence strongly suggests that Kline continues to conceal relevant devices and social media accounts—including, now, the CvilleReports@gmail.com address. *See id.* at 6–12.

Courts routinely order adverse inferences due to misconduct in discovery. For example, in *F.T.C. v. Asia Pacific Telecom, Inc.*, the court granted adverse inferences as a sanction for the defendants’ deletion of a critical email account. 788 F. Supp. 2d 779, 791 (N.D. Ill. 2011). The court found that the deletion of the email account not only violated a court order, but “subsequent false testimony” regarding the deletion “underscore[d the] bad faith.” *Id.* at 790. The court concluded that adverse inferences were the appropriate sanction because they held the defendants “to account for whatever communications” the email account contained, and while the lost evidence might have been exculpatory, the sanction forced the defendants “to bear the uncertainty” they created. *Id.* at 791; *see Beaven v. U.S. Dep’t of Justice*, 622 F.3d 540, 555 (6th Cir. 2010).

Kline’s misconduct in discovery—failing to preserve and withholding evidence, and continuing to deceive the Court and Plaintiffs regarding critical sources of discovery—similarly calls for adverse inferences. Kline’s contumacious conduct has prejudiced Plaintiffs’ ability to develop their case, and the adverse inferences requested in Plaintiffs’ Sanctions Motions will compensate Plaintiffs by helping fill the evidentiary gap and facilitating Plaintiffs’ case. *See Asia Pac. Telecom*, 788 F. Supp. at 791 (holding that adverse inferences that helped facilitate plaintiff’s

case were a “properly ‘remedial’ civil contempt sanction”); *United States v. United Mine Workers of Am.*, 330 U.S. 258, 303–04 (1947) (one purpose of civil contempt sanctions is to “compensate the complainant for losses sustained”). Evidentiary sanctions are also warranted to deter misconduct by other Defendants. *See* Second Sanctions Motion 19. If a finding of civil contempt, thousands of dollars in fines, and incarceration could not compel Kline to comply and cure the prejudice Plaintiffs have suffered, no less drastic sanction will lead to different results. *See Pruitt v. Bank of Am., N.A.*, No. 8:15-cv-01310, 2016 WL 7033972, at \*3 (D. Md. Dec. 2, 2016). This Court should not permit Kline to avoid accountability by stonewalling his discovery obligations nor reward him for his continued disobedience.

\* \* \* \* \*

For the foregoing reasons, Plaintiffs respectfully request that the Court grant Plaintiffs’ First and Second Sanctions Motions.

Dated: January 29, 2020

Respectfully submitted,

/s/ Robert T. Cahill

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 29, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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edward@rebrooklaw.com

*Counsel for Defendants Jeff Schoep, National Socialist Movement, and Nationalist Front*



I further hereby certify that on January 29, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

Christopher Cantwell  
christopher.cantwell@gmail.com

Vanguard America  
c/o Dillon Hopper  
dillon\_hopper@protonmail.com

Robert Azzmador Ray  
azzmador@gmail.com

Elliott Kline a/k/a Eli Mosley  
eli.f.mosley@gmail.com  
deplorabletruth@gmail.com

Matthew Heimbach  
matthew.w.heimbach@gmail.com

*/s/ Robert T. Cahill*

---

Robert T. Cahill (VSB 38562)  
COOLEY LLP

*Counsel for Plaintiffs*

# EXHIBIT A

**From:** [Ken Kim](#)  
**To:** [Jessica Phillips](#)  
**Cc:** [Yotam Barkai](#); [iDS\\_SINKS-02678](#)  
**Subject:** RE: Kline  
**Date:** Friday, January 17, 2020 10:29:16 AM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[RE Sines v Kessler Kline Discovery.msg](#)

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Hi Jessica:

Please see attached last correspondence with Mr. Kline (where you were copied) asking him to confirm search terms hits for document promotion to Review workspace so he can access and review. Mr. Kline has not responded back to this email yet.

Regards,  
Ken

Kenneth Kim  
Consultant, Discovery Services  
iDiscovery Solutions  
Mobile: 267.847.4876



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**From:** Jessica Phillips <jphillips@bsfllp.com>  
**Sent:** Friday, January 17, 2020 10:17 AM  
**To:** Ken Kim <kkim@idsinc.com>  
**Cc:** Jessica Phillips <jphillips@bsfllp.com>; Yotam Barkai <ybarkai@bsfllp.com>  
**Subject:** Kline

Ken,

Have you made Kline's documents available to him for his review? Do you know whether he has started his review?

**Jessica E. Phillips**

Partner

---

**BOIES SCHILLER FLEXNER LLP**

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# ATTACHMENT

**From:** Ken Kim <kkim@idsinc.com>  
**Sent:** Tuesday, January 7, 2020 1:46 PM  
**To:** Eli Mosley; Michael Bloch  
**Cc:** Bobby Williams; Yotam Barkai; eli.f.mosley@gmail.com; eli.r.kline@gmail.com; iDS\_SINKS-02678; Jessica Phillips  
**Subject:** RE: Sines v Kessler Kline Discovery  
**Attachments:** STR 2020.01.07\_Kline Emails.pdf; STR 2020.01.07\_Kline Mobile.pdf

Mr. Kline:

Please find attached the search term hits reporting for the email data and mobile data we have collected. Once you have had a chance to review these reports, please confirm that we should get the total hits populations for both data sets promoted to our Relativity database so you can review the documents for responsiveness and/or privilege for subsequent production to Plaintiff.

We will provide you with access to the Relativity workspace and provide any training required to start your review of the documents once both data sets have been promoted to our Relativity database.

Let us know if you have any questions.

Regards,  
Ken

Kenneth Kim  
Consultant, Discovery Services  
iDiscovery Solutions  
Mobile: 267.847.4876



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**From:** Ken Kim  
**Sent:** Tuesday, January 7, 2020 11:30 AM  
**To:** Eli Mosley <deplorabletruth@gmail.com>; Michael Bloch <mbloch@kaplanhecker.com>  
**Cc:** Bobby Williams <bwilliams@idsinc.com>; Yotam Barkai <ybarkai@bsflp.com>; eli.f.mosley@gmail.com; eli.r.kline@gmail.com; iDS\_SINKS-02678 <ids\_sinks-02678@idsinc.com>; Jessica Phillips <jphillips@bsflp.com>  
**Subject:** RE: Sines v Kessler Kline Discovery

Mr. Kline:

Thank you for your response. Then we will share with Plaintiff's counsel the reporting on the detailed hits numbers for each of the specific search terms for the mobile and email data at the same these are provided to you for review.

Regards,  
Ken

Kenneth Kim  
Consultant, Discovery Services  
iDiscovery Solutions  
Mobile: 267.847.4876



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**From:** Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>  
**Sent:** Tuesday, January 7, 2020 11:25 AM  
**To:** Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
**Cc:** Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)>; Yotam Barkai <[ybarkai@bsfllp.com](mailto:ybarkai@bsfllp.com)>; [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com); [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com); iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Jessica Phillips <[jphillips@bsfllp.com](mailto:jphillips@bsfllp.com)>  
**Subject:** Re: Sines v Kessler Kline Discovery

Hello,

Sorry but I misunderstood what was being asked. No I do not refuse to consent to this and this information can be sent to myself and the plaintiffs.

On Tuesday, January 7, 2020, Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)> wrote:

Mr. Kline:

Just to clarify, Mr. Kim's request was whether you consent to allow the vendor to tell us solely the number of hits that the search terms returned on your mobile and email accounts for purposes of our informing the judge of that information. Are you refusing to consent to this?

**Michael Bloch | Kaplan Hecker & Fink LLP**  
Counsel  
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[New York, New York 10118](#)  
(W) 929.367.4573 | (M) 646.398.0345  
[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)

**From:** Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>  
**Sent:** Tuesday, January 7, 2020 10:28 AM  
**To:** Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>  
**Cc:** Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)>; Yotam Barkai <[ybarkai@bsfllp.com](mailto:ybarkai@bsfllp.com)>; [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com); [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com); iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Jessica Phillips <[jphillips@bsfllp.com](mailto:jphillips@bsfllp.com)>; Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
**Subject:** Re: Sines v Kessler Kline Discovery

Hello,

Please provide me with discovery search results individually for review and then I'll let you know when to release them once they are reviewed.

Thank you,

Elliott Kline

On Tuesday, January 7, 2020, Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)> wrote:

Mr. Kline:

We were able to bypass this obstacle and successfully collected all three of your email accounts. Also, we have completed loading your mobile data to our database for application of search terms. We are currently in the process of doing the same for your email accounts. Once we have completed all the data, we will provide you with the search term hits reporting for both the mobile and email data for your review so we can subsequently get the relevant data promoted to our Relativity database for your review.

Also, please advise if you consent to us disclosing the search term hits reporting for both the mobile and email data to Plaintiff's counsel, either at the same time the reporting is provided to you or at a later time once you've had an opportunity to review.

Regards,

Ken

Kenneth Kim

Consultant, Discovery Services

iDiscovery Solutions

Mobile: 267.847.4876





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**From:** Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)>  
**Sent:** Monday, January 6, 2020 5:06 PM  
**To:** Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>  
**Cc:** Yotam Barkai <[ybarkai@bsflp.com](mailto:ybarkai@bsflp.com)>; Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com); [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com); iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Jessica Phillips <[jphillips@bsflp.com](mailto:jphillips@bsflp.com)>; Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
**Subject:** RE: Sines v Kessler Kline Discovery

Mr. Kline,

If you have 5 minutes to speak quickly, we need to reexport a few of these archives. Some of the files were corrupted during download.

It will be as fast as the last conversion we had this morning, which took about 5 minutes.

---

**Bobby Williams, EnCE, GCFE**

Managing Consultant

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---

**From:** Bobby Williams  
**Sent:** Monday, January 6, 2020 8:38 AM

**To:** Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>  
**Cc:** Yotam Barkai <[ybarkai@bsflp.com](mailto:ybarkai@bsflp.com)>; Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com);  
[eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com); iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Jessica Phillips  
<[jphillips@bsflp.com](mailto:jphillips@bsflp.com)>; Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
**Subject:** RE: Sines v Kessler Kline Discovery

Good Morning Sir,

I did not see this message on Sunday. Can we schedule a time today that works for you?

---

**Bobby Williams, EnCE, GCFE**

Managing Consultant

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**Sent:** Sunday, January 5, 2020 10:10 AM  
**To:** Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)>  
**Cc:** Yotam Barkai <[ybarkai@bsflp.com](mailto:ybarkai@bsflp.com)>; Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com);  
[eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com); iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Jessica Phillips  
<[jphillips@bsflp.com](mailto:jphillips@bsflp.com)>; Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
**Subject:** Re: Sines v Kessler Kline Discovery

Bobby,

I am able to receive a code whenever today.

Thanks,

On Sat, Jan 4, 2020 at 1:52 PM Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)> wrote:

Thank you. I will try to monitor email and stand by.

---

**Bobby Williams, EnCE, GCFE**

Managing Consultant

Direct: 202.249.7834

Mobile: 202.642.2113



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**From:** Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>

**Sent:** Saturday, January 4, 2020 1:51 PM

**To:** Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)>

**Cc:** Yotam Barkai <[ybarkai@bsflp.com](mailto:ybarkai@bsflp.com)>; Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com); [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com); iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Jessica Phillips <[jphillips@bsflp.com](mailto:jphillips@bsflp.com)>; Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>

**Subject:** Re: Sines v Kessler Kline Discovery

Hello,

I don't have access right now to the phone number to receive the code but as soon as I do I will let you know and then we can jump on the phone to get it done quickly.

Thank you,

On Sat, Jan 4, 2020 at 12:49 PM Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)> wrote:

I now have to step away. Please let me know if there is a specific time today we can coordinate the verification code.

---

**Bobby Williams, EnCE, GCFE**

Managing Consultant

Direct: 202.249.7834

Mobile: 202.642.2113



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**From:** Bobby Williams  
**Sent:** Saturday, January 4, 2020 12:34 PM  
**To:** Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>  
**Cc:** Yotam Barkai <[ybarkai@bsflp.com](mailto:ybarkai@bsflp.com)>; Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com); [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com); iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Jessica Phillips <[jphillips@bsflp.com](mailto:jphillips@bsflp.com)>; Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
**Subject:** RE: Sines v Kessler Kline Discovery

Thank you sir. Unfortunately, that one will not work. The code will need to be entered seconds after it is received.

If you are free now, I can send you a new code if you can email it back the moment you receive it. If you can, let me know and I will send it to you now.

---

**Bobby Williams, EnCE, GCFE**

Managing Consultant

Direct: 202.249.7834

Mobile: 202.642.2113



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**From:** Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>

**Sent:** Saturday, January 4, 2020 12:32 PM

**To:** Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)>

**Cc:** Yotam Barkai <[ybarkai@bsflp.com](mailto:ybarkai@bsflp.com)>; Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com); [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com); iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Jessica Phillips <[jphillips@bsflp.com](mailto:jphillips@bsflp.com)>; Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>

**Subject:** Re: Sines v Kessler Kline Discovery

Bobby,

I got a verification code sent to me last night that was G-923382. Please let me know if this works for what you need or if you need to have it resent and I can tell you the new code.

Thanks,

On Sat, Jan 4, 2020 at 11:43 AM Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)> wrote:

Good Morning All,

Looks like we will need to have a call to download the remaining archive for the last email account. The call should take 5 minutes or less.

Thank you all for your time,

---

**Bobby Williams, EnCE, GCFE**

Managing Consultant

Direct: 202.249.7834

Mobile: 202.642.2113



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**From:** Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>  
**Sent:** Friday, January 3, 2020 12:45 PM  
**To:** Yotam Barkai <[ybarkai@bsflp.com](mailto:ybarkai@bsflp.com)>  
**Cc:** Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; Bobby Williams <[bwilliams@idsinc.com](mailto:bwilliams@idsinc.com)>; [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com); [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com); iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Jessica Phillips <[jphillips@bsflp.com](mailto:jphillips@bsflp.com)>; Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
**Subject:** Re: Sines v Kessler Kline Discovery

Mr Barkai,

Yes I will be able to make that call at that time.

Thank you,

Elliott Kline

On Fri, Jan 3, 2020 at 12:40 PM Yotam Barkai <[ybarkai@bsflp.com](mailto:ybarkai@bsflp.com)> wrote:

Mr. Kline:

As you know, the Court has ordered us to conduct a conference call to resolve any remaining authentication issues regarding your Gmail accounts. The third-party discovery vendor and Plaintiffs' counsel are available at 1:15 p.m. today. Could you please confirm your availability at that time?

Please call the following number at 1:15 p.m.:

Dial-in: 877-211-3621

Passcode: 158889

Thank you.

**Yotam Barkai**  
Associate

---

**BOIES SCHILLER FLEXNER LLP**

(t) +1 212 303 3643

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**From:** Ken Kim [mailto:[kkim@idsinc.com](mailto:kkim@idsinc.com)]  
**Sent:** Monday, December 16, 2019 2:25 PM  
**To:** Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>; Michael Bloch <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>  
**Cc:** iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>; Yotam Barkai <[ybarkai@bsflp.com](mailto:ybarkai@bsflp.com)>  
**Subject:** RE: Sines v Kessler Kline Discovery

Mr. Kline:

We have received your password for [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com) email account for collection purposes, thank you.

However, we cannot proceed with any of the collections for your three email accounts ([deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com); [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com); [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com)) without your assistance to bypass the 2-factor authentication security set up for these Gmail accounts.

Can you please respond back with date/time that works for you to connect with our forensic team to address the 2-factor authentication?

Thanks,

Ken

Kenneth Kim

Consultant, Discovery Services

iDiscovery Solutions

Mobile: 267.847.4876



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**From:** Ken Kim

**Sent:** Thursday, December 12, 2019 11:39 AM

**To:** 'Eli Mosley' <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>; 'Michael Bloch' <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>

**Cc:** iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>

**Subject:** RE: Sines v Kessler Kline Discovery

Mr. Kline:

Reaching out to you again for the password to access your [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com) email account for collection purposes – please let us know.



Also, can you please confirm that you are in receipt of your mobile device we shipped out on Tuesday (Fedex tracking is showing it was delivered yesterday)?

And, finally, Bobby Williams reached out to you yesterday about setting up a date/time to address 2-factor authentication for your [deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com) and [eli.f.mosley@gmail.com](mailto:eli.f.mosley@gmail.com) email accounts to access for collection purposes – can you please respond back to him with date/time that works for you?

Thanks,  
Ken

Kenneth Kim

Consultant, Discovery Services

iDiscovery Solutions

Mobile: 267.847.4876



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**From:** Ken Kim

**Sent:** Wednesday, December 4, 2019 1:30 PM

**To:** 'Eli Mosley' <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)>; 'Michael Bloch' <[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)>

**Cc:** iDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>

**Subject:** RE: Sines v Kessler Kline Discovery

Mr. Kline:

Could you please provide us with password to access your [eli.r.kline@gmail.com](mailto:eli.r.kline@gmail.com) email account for collection purposes?

Thanks,

Ken

**Kenneth Kim**

Consultant, Discovery Services

iDiscovery Solutions

Mobile: 267.847.4876



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**From:** Ken Kim

**Sent:** Wednesday, December 4, 2019 1:19 PM

**To:** Eli Mosley <

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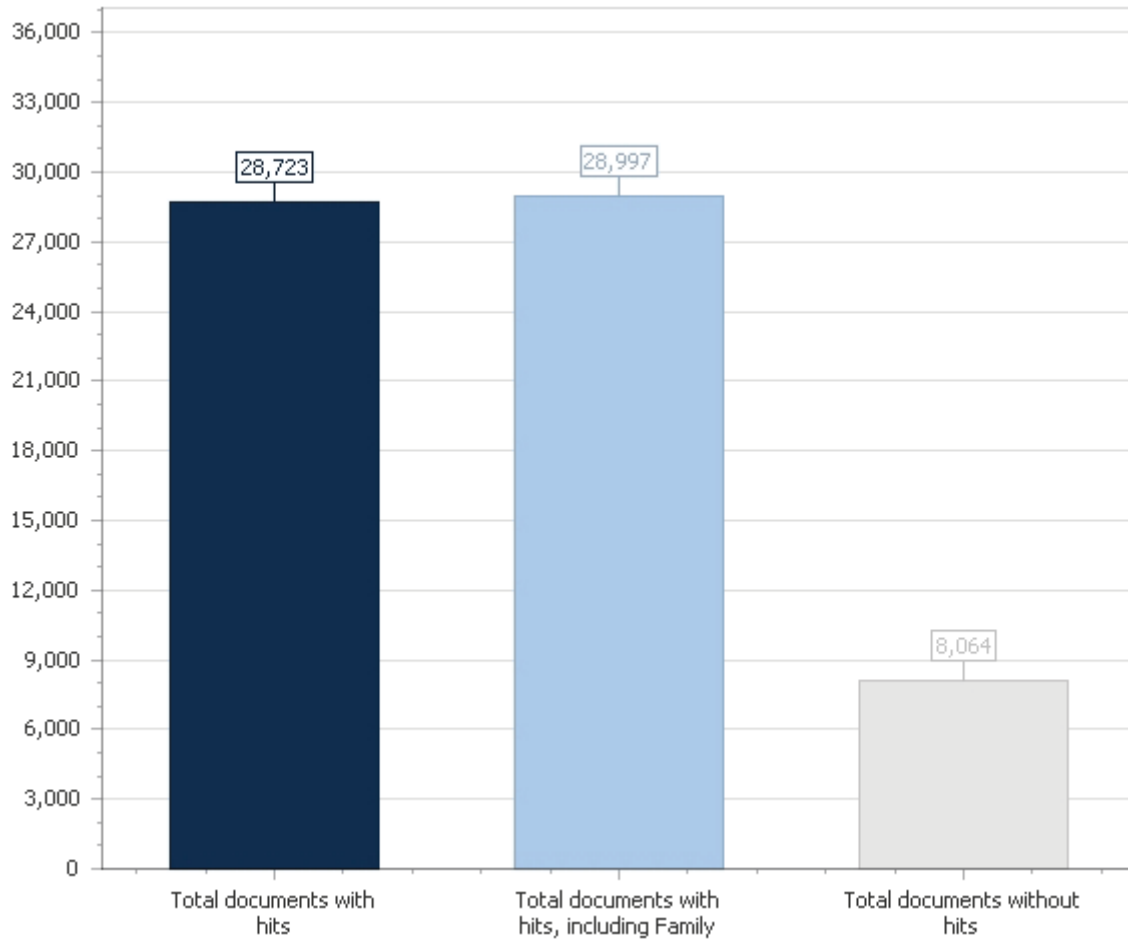


# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email



### Results Summary

Documents in searchable set	Total documents with hits	Total documents with hits, including Family	Total documents without hits
37,061	28,723	28,997	8,064



# SINKS-02678\_Staging


## Search Terms Report

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

### Terms Summary

Term	Documents with hits	Documents with hits, including Family	Unique hits
(((((Unity w/3 "and") w/3 Security) w/3 for) w/3 America)	0	0	0
((((League w/3 of) w/3 the) w/3 South)	135	364	0
((((Rebel w/3 Brigade) w/3 of) w/3 Knights)	0	0	0
((Brion w/3 Keith) w/3 Baker)	0	0	0
((Charlottesville w/3 Police) w/3 Department)	13	51	0
((East w/3 Coast) w/3 Knights)	101	322	0
((Everett w/3 Nick) w/3 Case)	0	0	0
((James w/3 Alex) w/3 Fields)	91	295	0
((Loyal w/3 White) w/3 Knights)	97	322	0
((National w/3 Park) w/3 Service)	1	2	0
((National w/3 Socialist) w/3 Movement)	154	340	0
((Rise w/3 Above) w/3 Movement)	3	16	0
((Stefani w/3 Gunter) w/3 Hopkins)	0	0	0
((Tactical w/3 American) w/3 Patriots)	0	0	0
((Traditionalist w/3 Worker) w/3 Party)	129	341	1
((Unite w/3 the) w/3 Right)	133	304	2
((united w/5 church) w/5 christ)	3	6	0
A11	3	8	0
A12	2	5	0


**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
Aaron w/3 VA	1	2	0
Ajax*	19	39	0
AK w/3 Lane	1	1	0
Al w/3 Thomas	3	6	0
Albion	13	18	0
Alex w/3 Fields	99	309	0
Allison w/3 Peirce	0	0	0
Alt w/3 Knights	98	315	0
AltRightVA	37	37	28
Americana*	332	478	0
Andrea w/3 Owens	0	0	0
Anglin	137	358	2
Anthime	0	0	0
Antifa	390	562	87
April w/3 Muniz	110	329	0
Armed	105	366	4
Arrest*	209	485	1
Atomwaffen	3	27	0
Augustus	117	353	1
Azzmador	151	389	2
Bait	18	25	3
Baked w/3 Alaska	36	78	1
bakedalaska	60	64	27
Baker	53	93	0
Balcaitis	3	6	0
baton	18	79	0
Battaglia	1	1	0
Beat	171	358	14
Ben w/3 Garland	0	0	0



# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
Benjamin w/3 Garland	0	0	0
Black	839	1,163	97
Blast	64	66	2
BLM	24	59	1
Boechat	0	0	0
Boman	1	10	0
Bomb	80	241	4
Brad w/3 Griffin	0	0	0
Brathovd	4	5	1
Brian w/3 Lambert	0	0	0
Burn	68	186	13
Caerulus*	47	63	3
Cantwell	283	536	6
car w/3 attack	9	71	0
car w/3 hit	5	121	0
Cesar w/3 Hess	0	0	0
Challenger	56	113	1
Chapman	38	178	0
Charles w/3 Myers	0	0	0
Charlottesville	527	760	16
Charlottesville w/3 2.0	21	65	0
Chef w/3 Goyardee	1	2	0
ChefGoyardee*	1	2	0
Chelsea w/3 Alvarado	107	325	0
Chesny	0	0	0
city w/3 council	18	82	0
Cole	46	93	0
Cole w/3 Harris	1	1	0
Colton	11	32	1



# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
Colton w/3 Merwin	4	6	0
Commander w/3 Hunt	0	0	0
Conviction	23	131	0
Corcoran	0	0	0
Cormier	6	31	0
Counterprotest	0	0	0
CPD	10	15	0
Crockett	4	14	0
Custalow	0	0	0
cville	62	154	7
Daley	1	10	0
Damigo	212	476	1
Danny w/3 Wolf	0	0	0
date(06/17)	0	0	0
date(07/08)	0	0	0
date(08/11)	2	20	0
date(08/12)	1	2	0
date(08/13)	0	0	0
date(Aug* 11)	1	1	0
date(Aug* 12)	4	13	0
date(Aug* 13)	0	0	0
date(July 8)	0	0	0
date(June 17)	0	0	0
David w/3 Duke	50	81	0
Derek w/3 Davis	0	0	0
DeusVolt*	0	0	0
Dickinson	12	75	1
Dillon w/3 Hopper	55	216	0
Dillon1488	8	61	0





# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
Discord	240	454	20
Dodge	29	87	0
Duke	107	222	0
Dustin w/3 Owens	0	0	0
Eli w/3 Mosely	48	206	0
Eli w/3 Mosley	5,953	6,242	0
Eliot w/3 Kline	1	1	0
Elizabeth w/3 Sines	176	404	0
Elliot w/3 Kline	184	424	0
Emancipation	45	99	14
Enoch	187	395	5
Entwisle	0	0	0
Erica	31	92	3
Erica w/3 Alduino	14	53	0
Erika	5	6	1
Ethnostate	57	92	28
Europa	141	392	6
Evan w/3 McLaren	40	90	0
Evan w/3 Thomas	6	12	0
Evropa	302	623	0
Fag	15	34	1
Fashy w/3 Haircut	31	51	4
Fields	227	553	4
Fight	484	731	60
Firearm	33	119	0
first w/3 baptist	5	9	0
FOAK	3	6	0
Fraternal w/3 Order	102	322	0
Frisbadli	0	0	0




# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email


Term	Documents with hits	Documents with hits, including Family	Unique hits
Gillen	0	0	0
Gionet	4	8	0
Goldstein w/3 Riots	8	8	0
GoyMeetsWorld	1	2	0
Gun	389	549	7
Hamblen	0	0	0
Hannah w/3 Pearce	109	327	0
heather w/3 heyer	18	72	0
Heimbach	390	580	0
Heimdulf*	0	0	0
Heinz*	13	21	0
helmets	28	188	1
Herrenvolk*	0	0	0
Hess	16	62	0
Higgs	10	40	0
HiptotheJQ	0	0	0
Horton	8	13	0
HueTheHand	1	2	0
Hunter w/3 Wallace	30	74	1
Identity w/3 Evropa	302	623	0
IE	136	251	47
intimidat*	70	309	2
Invictus	118	341	1
Irizarry	6	62	0
Jack w/3 Pierce	0	0	0
Jackson w/3 Park	14	17	0
James w/3 Fields	122	341	0
Jason	345	743	12
Jaymi w/3 Danielle	0	0	0


**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
Jeff w/3 Schoep	146	338	0
Jefferson w/3 monument	6	14	0
jefferson w/3 st*	74	190	0
Jefferson w/3 Statue	7	13	0
Jew	170	343	26
JJ w/3 Power	0	0	0
Johnny w/3 O'Connell, Malley	0	0	0
Joyce w/3 Bennett	0	0	0
Justice w/3 Park	5	43	0
Kathleen w/3 Snyder	0	0	0
Kawczynski	0	0	0
Kike	57	99	6
Kill	258	449	29
KKK	40	112	1
Klan	111	354	1
Kleve	1	10	0
Kline	21,758	22,137	17,988
Knife	63	184	4
Knives	37	100	0
Krist*	46	93	4
Kurt	40	68	0
Kyle w/3 Chapman	26	164	0
Kyle w/3 Rogers	0	0	0
Lafayette	23	29	1
Laube	0	0	0
Lawrence w/3 TX	0	0	0
Lee w/3 Park	20	125	1
lighter w/3 fluid	2	8	0


**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
Lightfoot w/3 Militia	2	7	0
Linden	12	19	1
Lolyouwish	0	0	0
LOS	1,507	1,629	3
Ludovici w/3 Alibi	0	0	0
Luis w/3 Bellino	0	0	0
LWK	3	6	0
mace*	29	91	1
Maclmay	0	0	0
Maddimension	5	36	0
Mahler	1	20	0
ManWithTheHand	56	57	47
Marcus w/3 Liebowitz	10	10	0
Marcus w/3 Martin	110	327	0
Marie	35	76	3
Marissa w/3 Blair	105	327	0
Markus w/3 Anthony	0	0	0
Matthewheimbach	7	36	0
Maurice w/3 Jones	0	0	0
McCarthy	54	204	1
McCormick w/3 Foley	0	0	0
mcguffey w/3 park	4	8	0
McInnes	133	135	3
McIntire	16	90	0
McLaren	43	173	0
McPherson	38	45	7
Merwin	15	34	0
Metropolitan w/3 Police	0	0	0
Michael w/3 Hill	120	357	0




# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
Miselis	0	0	0
Moonbase w/3 Holdings	100	322	0
Mosley	5,966	6,269	3
Mothersbaugh	0	0	0
Mrozek	0	0	0
nameless w/3 field	13	61	0
Nat* w/3 Damigo	192	462	0
Natalie w/3 Romero	107	325	0
Nationalist w/3 Front	139	342	0
Nazi	324	474	18
New w/3 Byzantium	0	0	0
Newberry	8	10	0
NF	32	104	0
Nigger	18	34	1
NPS	2	3	0
NSM	50	141	0
Paramilitary	15	134	0
Parrot*	156	378	0
Parrott	145	369	0
Patrick w/3 Little	4	4	1
Patrick w/3 Palmer	0	0	0
Patriot w/3 Front	5	88	0
Peinovich	119	346	0
Phillip-TX	2	35	0
Pistolis	2	25	0
Proud w/3 Boys	38	80	2
Punch	53	78	4
queenarchitect	2	2	0
Race w/3 War	18	64	3


**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
racis*	344	535	40
Radical w/3 Agenda	40	137	1
Radicalagenda	31	76	0
RaHoWa	1	1	0
Rally	370	601	21
RAM	28	153	8
RCO w/3 Nick	4	8	0
Reinhard w/3 wolff	13	38	3
Richard	663	1,042	46
Richard w/3 Preston	0	0	0
Richard w/3 Spencer	490	745	0
Robert w/3 Ray	123	333	0
Roche	2	5	0
Rotunda	9	52	0
Rousseau	28	124	0
Ruiz	12	30	0
Run w/3 over	11	115	0
Rundo	0	0	0
Sacco	16	85	1
SaintCharles	0	0	0
Salazar	4	5	0
Schoep	157	338	0
Seth w/3 Wispelwey	108	329	0
Shane w/3 Long	0	0	0
Sheehy	0	0	0
Shield	100	285	31
Shoot	113	212	4
Shyne	0	0	0
Silasreynolds	0	0	0



# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
Sines	472	788	0
Snuffer	0	0	0
Spencer	591	866	21
Spray	42	219	2
St. w/3 Paul*	13	20	0
Stab	7	9	0
Stankard	2	2	0
Starsia	1	20	0
Statue	61	228	0
Stickman	2	38	0
Stormer	58	172	1
SURJ	1	1	0
tear w/3 gas*	10	141	0
the w/3 lawn	14	109	0
Thebigkk	1	2	0
Thewizardofthorntonpark	0	0	0
Thomas w/10 Rousseau	25	114	0
thomas w/3 jefferson	15	107	0
Thomas w/3 Ryan	22	93	0
Tibor	0	0	0
torch*	111	408	0
Trained w/3 fighters	0	0	0
Treadstone	0	0	0
Trial	502	808	74
Trigger	45	56	2
Troutman	4	20	0
Tscags88	0	0	0
Tubbs	122	355	0



# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Emails

Searchable Set: Klein\_Elliot\_Email

Term	Documents with hits	Documents with hits, including Family	Unique hits
TWP	47	215	0
Tyrone	19	27	0
unitetheright	6	35	0
UTR	12	103	2
Vandal	35	194	3
Vanguard	240	526	4
Vasillios*	2	25	0
Vets	30	49	1
Vitco	0	0	0
Volkisch w/3 Soldar	0	0	0
Von Diez	2	12	0
Wade w/3 Garrett	0	0	0
Warlock	53	54	0
weapon*	260	548	12
Wendy w/3 Lewis	0	0	0
White w/3 nation*	236	462	22
White w/3 supremac*	179	416	5
White-PowerStroke	9	59	0
Wyatt	33	47	6
Zyniker	1	20	0



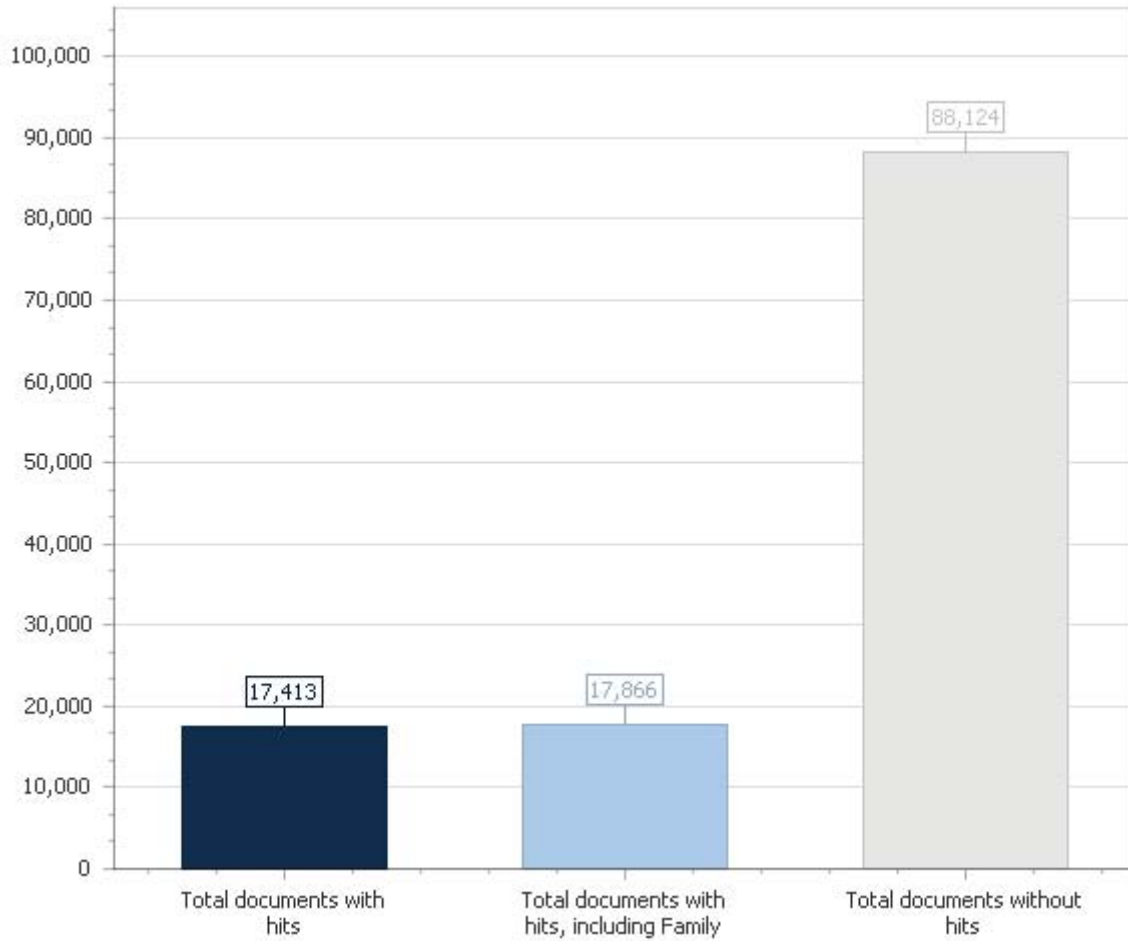


# SINKS-02678\_Staging

## Search Terms Report


Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107



### Results Summary

Documents in searchable set	Total documents with hits	Total documents with hits, including Family	Total documents without hits
105,990	17,413	17,866	88,124



**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

**Terms Summary**

Term	Documents with hits	Documents with hits, including Family	Unique hits
(((((Unity w/3 "and") w/3 Security) w/3 for) w/3 America)	0	0	0
((((League w/3 of) w/3 the) w/3 South)	5	5	0
((((Rebel w/3 Brigade) w/3 of) w/3 Knights)	0	0	0
((Brion w/3 Keith) w/3 Baker)	0	0	0
((Charlottesville w/3 Police) w/3 Department)	0	0	0
((East w/3 Coast) w/3 Knights)	0	0	0
((Everett w/3 Nick) w/3 Case)	0	0	0
((James w/3 Alex) w/3 Fields)	3	3	0
((Loyal w/3 White) w/3 Knights)	0	0	0
((National w/3 Park) w/3 Service)	2	2	2
((National w/3 Socialist) w/3 Movement)	0	0	0
((Rise w/3 Above) w/3 Movement)	1	1	1
((Stefani w/3 Gunter) w/3 Hopkins)	0	0	0
((Tactical w/3 American) w/3 Patriots)	0	0	0
((Traditionalist w/3 Worker) w/3 Party)	1	1	0
((Unite w/3 the) w/3 Right)	30	35	4
((united w/5 church) w/5 christ)	0	0	0
A11	0	0	0
A12	0	0	0


**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
Aaron w/3 VA	0	0	0
Ajax*	354	355	194
AK w/3 Lane	0	0	0
Al w/3 Thomas	0	0	0
Albion	0	0	0
Alex w/3 Fields	4	4	0
Allison w/3 Peirce	0	0	0
Alt w/3 Knights	1	1	0
AltRightVA	12	13	10
Americana*	9	9	8
Andrea w/3 Owens	0	0	0
Anglin	67	68	30
Anthime	0	0	0
Antifa	3,177	3,214	2,861
April w/3 Muniz	0	0	0
Armed	15	15	5
Arrest*	88	90	42
Atomwaffen	14	14	2
Augustus	96	99	6
Azzmador	16	16	4
Bait	4	4	3
Baked w/3 Alaska	15	15	7
bakedalaska	9	9	7
Baker	1	1	1
Balcitis	0	0	0
baton	7	7	3
Battaglia	0	0	0
Beat	74	75	53
Ben w/3 Garland	0	0	0



# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
Benjamin w/3 Garland	0	0	0
Black	460	469	381
Blast	3	3	3
BLM	8	8	5
Boechat	0	0	0
Boman	0	0	0
Bomb	40	41	29
Brad w/3 Griffin	3	3	2
Brathovd	3	3	0
Brian w/3 Lambert	0	0	0
Burn	37	37	24
Caerulus*	400	405	249
Cantwell	223	229	177
car w/3 attack	2	2	0
car w/3 hit	2	2	2
Cesar w/3 Hess	0	0	0
Challenger	6	9	3
Chapman	3	3	0
Charles w/3 Myers	0	0	0
Charlottesville	131	147	43
Charlottesville w/3 2.0	2	2	0
Chef w/3 Goyardee	1	1	1
ChefGoyardee*	0	0	0
Chelsea w/3 Alvarado	0	0	0
Chesny	0	0	0
city w/3 council	6	6	0
Cole	5	5	5
Cole w/3 Harris	0	0	0
Colton	9	9	4



# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
Colton w/3 Merwin	4	4	0
Commander w/3 Hunt	0	0	0
Conviction	1	1	1
Corcoran	0	0	0
Cormier	0	0	0
Counterprotest	0	0	0
CPD	0	0	0
Crockett	5	5	3
Custalow	0	0	0
cville	179	181	80
Daley	31	31	0
Damigo	784	799	0
Danny w/3 Wolf	0	0	0
date(06/17)	0	0	0
date(07/08)	0	0	0
date(08/11)	0	0	0
date(08/12)	0	0	0
date(08/13)	0	0	0
date(Aug* 11)	0	0	0
date(Aug* 12)	0	0	0
date(Aug* 13)	0	0	0
date(July 8)	0	0	0
date(June 17)	0	0	0
David w/3 Duke	23	23	0
Derek w/3 Davis	0	0	0
DeusVolt*	0	0	0
Dickinson	3	3	1
Dillon w/3 Hopper	1	1	0
Dillon1488	0	0	0




# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
Discord	244	260	153
Dodge	4	4	2
Duke	55	55	12
Dustin w/3 Owens	0	0	0
Eli w/3 Mosely	3	3	1
Eli w/3 Mosley	100	103	0
Eliot w/3 Kline	0	0	0
Elizabeth w/3 Sines	0	0	0
Elliot w/3 Kline	5	9	0
Emancipation	0	0	0
Enoch	569	585	447
Entwisle	0	0	0
Erica	568	572	418
Erica w/3 Alduino	5	5	0
Erika	10	10	7
Ethnostate	38	38	33
Europa	30	30	16
Evan w/3 McLaren	26	26	0
Evan w/3 Thomas	198	200	126
Evropa	56	59	18
Fag	48	48	38
Fashy w/3 Haircut	1	1	0
Fields	17	17	3
Fight	125	127	80
Firearm	1	1	1
first w/3 baptist	0	0	0
FOAK	1	1	0
Fraternal w/3 Order	0	0	0
Frisbadli	0	0	0



**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
Gillen	29	29	0
Gionet	0	0	0
Goldstein w/3 Riots	0	0	0
GoyMeetsWorld	0	0	0
Gun	77	78	48
Hamblen	0	0	0
Hannah w/3 Pearce	0	0	0
heather w/3 heyer	2	2	0
Heimbach	34	34	16
Heimdulf*	0	0	0
Heinz*	3	3	1
helmets	2	2	1
Herrenvolk*	0	0	0
Hess	6	7	6
Higgs	0	0	0
HiptotheJQ	0	0	0
Horton	0	0	0
HueTheHand	0	0	0
Hunter w/3 Wallace	21	22	11
Identity w/3 Evropa	36	39	0
IE	1,923	1,939	1,571
intimidat*	11	11	10
Invictus	91	94	3
Irizarry	0	0	0
Jack w/3 Pierce	2	2	0
Jackson w/3 Park	1	1	0
James w/3 Fields	8	8	0
Jason	1,113	1,124	843
Jaymi w/3 Danielle	0	0	0





**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
Jeff w/3 Schoep	1	1	0
Jefferson w/3 monument	1	1	0
jefferson w/3 st*	4	4	0
Jefferson w/3 Statue	3	3	0
Jew	139	143	86
JJ w/3 Power	0	0	0
Johnny w/3 Oâ€™Malley	0	0	0
Joyce w/3 Bennett	0	0	0
Justice w/3 Park	1	1	0
Kathleen w/3 Snyder	0	0	0
Kawzcynski	0	0	0
Kike	33	40	19
Kill	99	100	79
KKK	44	44	27
Klan	13	13	4
Kleve	0	0	0
Kline	1,207	1,271	1,164
Knife	8	8	3
Knives	2	2	0
Krist*	14	14	11
Kurt	273	274	208
Kyle w/3 Chapman	2	2	0
Kyle w/3 Rogers	0	0	0
Lafayette	14	20	1
Laube	0	0	0
Lawrence w/3 TX	0	0	0
Lee w/3 Park	10	11	7
lighter w/3 fluid	0	0	0


**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
Lightfoot w/3 Militia	0	0	0
Linden	0	0	0
Lolyowish	0	0	0
LOS	10	10	8
Ludovici w/3 Alibi	0	0	0
Luis w/3 Bellino	0	0	0
LWK	0	0	0
mace*	4	4	3
Maclmay	0	0	0
Maddimension	0	0	0
Mahler	0	0	0
ManWithTheHand	1	1	1
Marcus w/3 Liebowitz	0	0	0
Marcus w/3 Martin	0	0	0
Marie	29	29	17
Marissa w/3 Blair	0	0	0
Markus w/3 Anthony	0	0	0
Matthewheimbach	0	0	0
Maurice w/3 Jones	1	2	0
McCarthy	11	11	3
McCormick w/3 Foley	0	0	0
mcguffey w/3 park	0	0	0
McInnes	26	29	11
McIntire	10	10	2
McLaren	36	36	8
McPherson	0	0	0
Merwin	8	8	2
Metropolitan w/3 Police	0	0	0
Michael w/3 Hill	5	5	0




# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
Miselis	31	31	0
Moonbase w/3 Holdings	0	0	0
Mosley	158	162	53
Mothersbaugh	0	0	0
Mrozek	0	0	0
nameless w/3 field	1	1	0
Nat* w/3 Damigo	779	794	0
Natalie w/3 Romero	0	0	0
Nationalist w/3 Front	1	1	1
Nazi	189	201	124
New w/3 Byzantium	1	1	0
Newberry	1	1	0
NF	1	1	1
Nigger	63	63	43
NPS	1	1	0
NSM	9	9	1
Paramilitary	0	0	0
Parrot*	3	3	0
Parrott	1	1	0
Patrick w/3 Little	16	16	4
Patrick w/3 Palmer	0	0	0
Patriot w/3 Front	8	8	5
Peinovich	4	4	2
Phillip-TX	0	0	0
Pistolis	1	1	0
Proud w/3 Boys	70	71	27
Punch	34	35	17
queenarchitect	0	0	0
Race w/3 War	6	6	5


**SINKS-02678\_Staging**  
**Search Terms Report**

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
racis*	265	269	185
Radical w/3 Agenda	4	5	2
Radicalagenda	0	0	0
RaHoWa	3	3	1
Rally	231	243	91
RAM	4	4	1
RCO w/3 Nick	0	0	0
Reinhard w/3 wolff	1	1	1
Richard	4,223	4,442	339
Richard w/3 Preston	0	0	0
Richard w/3 Spencer	3,668	3,881	0
Robert w/3 Ray	0	0	0
Roche	5	5	1
Rotunda	1	1	0
Rousseau	3	3	0
Ruiz	0	0	0
Run w/3 over	14	14	13
Rundo	0	0	0
Sacco	120	121	49
SaintCharles	0	0	0
Salazar	0	0	0
Schoep	1	1	0
Seth w/3 Wispelwey	0	0	0
Shane w/3 Long	0	0	0
Sheehy	0	0	0
Shield	11	11	8
Shoot	48	50	35
Shyne	0	0	0
Silasreynolds	0	0	0



# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
Sines	3	3	3
Snuffer	0	0	0
Spencer	3,906	4,125	172
Spray	4	4	4
St. w/3 Paul*	0	0	0
Stab	2	2	0
Stankard	0	0	0
Starsia	0	0	0
Statue	25	25	8
Stickman	6	6	2
Stormer	47	48	25
SURJ	0	0	0
tear w/3 gas*	4	4	4
the w/3 lawn	5	5	4
Thebigkk	0	0	0
Thewizardofthorntonpark	0	0	0
Thomas w/10 Rousseau	3	3	0
thomas w/3 jefferson	4	4	0
Thomas w/3 Ryan	0	0	0
Tibor	0	0	0
torch*	37	38	14
Trained w/3 fighters	0	0	0
Treadstone	0	0	0
Trial	29	29	21
Trigger	17	17	9
Troutman	2	2	0
Tscags88	0	0	0
Tubbs	1	1	0



# SINKS-02678\_Staging

## Search Terms Report

Report Name: STR 2020.01.07\_Kline Mobile

Searchable Set: Kline\_Mobile Data\_20200107

Term	Documents with hits	Documents with hits, including Family	Unique hits
TWP	32	32	10
Tyrone	1	1	1
unitetheright	0	0	0
UTR	6	8	0
Vandal	68	69	13
Vanguard	68	72	33
Vasillios*	1	1	0
Vets	14	14	9
Vitco	1	1	0
Volkisch w/3 Soldar	0	0	0
Von Diez	5	5	4
Wade w/3 Garrett	0	0	0
Warlock	4	4	4
weapon*	70	71	52
Wendy w/3 Lewis	3	3	0
White w/3 nation*	90	101	51
White w/3 supremac*	77	82	41
White-PowerStroke	0	0	0
Wyatt	99	102	78
Zyniker	0	0	0