# 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' MOTION TO COMPEL DISCOVERY FROM DEFENDANT ROBERT "AZZMADOR" RAY

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#### PRELIMINARY STATEMENT

At every step in this case, Defendant Robert "Azzmador" Ray ("Ray") has tried to avoid his discovery obligations. As one of the most vocal and violent leaders of this conspiracy, Ray generated and has possessed compelling evidence that he and his co-Defendants planned to commit the violence that occurred in Charlottesville the weekend of August 11-12, 2017. In addition to discussing the events on his recorded podcast both before and after the weekend, Ray brought a personal cameraman to record and livestream what took place on the streets of Charlottesville in August 2017. However, Ray has disparaged the discovery process and, at several points, has disappeared from the litigation altogether. To date, Ray has still not only failed to produce podcasts and videos regarding Unite the Right that are in his possession, but he also has refused to turn over numerous devices and account credentials that he had previously disclosed to Plaintiffs. Ray's own documents demonstrate that he failed to disclose additional devices and accounts that he used to communicate with other Defendants and *on the day of Unite the Right itself*.

The deadline for all Defendants to produce discoverable material to Plaintiffs passed on February 5, 2020. Accordingly, pursuant to Federal Rule of Civil Procedure 37, Plaintiffs respectfully request that the Court compel Ray to (1) produce his second laptop, his second cellphone, and all other electronic devices within his possession to the third-party discovery vendor (the "Vendor") for imaging and collection; (2) disclose his Daily Stormer, Krypto Report, Skype, Gab.ai, Twitter, and any other social media accounts and credentials within his possession to the Vendor for imaging and collection; (3) produce immediately to Plaintiffs without the opportunity for Ray's review every document from his devices and accounts that hit on any search term previously agreed-upon by the parties; and (4) pay Plaintiffs' reasonable expenses, including attorneys' fees and costs, incurred in prosecuting this Motion.

#### BACKGROUND

#### I. Ray Played a Significant Role in the Conspiracy

At the time of the Unite the Right rally in Charlottesville, Ray was and continues to be a writer for The Daily Stormer, a white supremacist commentary and message board website named after the Nazi Party's tabloid newspaper, Der Sturmer. The website, which became the most visited hate site on the Internet in 2016, includes sections titled "Jewish Problem" and "Race War," and advocates for, among other things, the genocide of Jewish people. Second Am. Compl. ¶ 25, 27, 202, ECF No. 557 ("SAC"). Ray and other associates at the Daily Stormer use the website "as a hardcore front for the conversion of masses into a pro-white, Anti-semitic ideology," to "sell [] global white supremacy," and to "make a racist army." *Id.* ¶ 25.

Through his work with the Daily Stormer, Ray played an important role in promoting and facilitating the events at issue in this case. The Daily Stormer released its own poster promoting the "rally" that read, "UNITE THE RIGHT/ Join Azzmador and the Daily Stormer to end Jewish influence in America," accompanied by a figure wielding a hammer, poised to smash a Jewish star. *Id.* ¶¶ 25, 90. Ray and defaulted defendant Andrew Anglin used the Daily Stormer's website to issue directives to readers ahead of the Unite the Right weekend. In articles titled "Operational Security for Right Wing Rallies" and "Charlottesville: Why You Must Attend and What to Bring and Not to Bring!" "Stormers" were told that they were required to bring tiki torches and should also bring pepper spray, flag poles, flags, and shields. *Id.* ¶¶ 115, 117. The Daily Stormer site was critical not only in the planning stage, but during the events themselves. The Daily Stormer site set up "meet ups" and chat rooms that co-conspirators and attendees used throughout the August 11 and 12 weekend to coordinate their violence. *Id.* ¶ 83. Defendants Anglin and Ray also used

<sup>&</sup>lt;sup>1</sup> Alexander Zaitchik, *The Brawler*, SOUTHERN POVERTY LAW CENTER (Aug. 5, 2018), https://www.splcenter.org/fighting-hate/intelligence-report/2018/brawler.

Stormer "Book Clubs." *Id.* ¶¶ 91-92. These clubs have nothing to do with books. Ray has stated that (Ex. 1 at 3, 2017-07-30 email chain between Ray and RR0198011.) In Anglin's words, the Stormer Book Clubs (SBCs) are meant to be "a real-life troll army" in a future race war. Ray is credited with energizing and organizing SBCs and helping them become the "on the ground" component of the Daily Stormer website.

Ray's participation went beyond his role as a Daily Stormer contributor. On the Discord server "Southern Front" Ray gave assurances and advice about what to bring and what to avoid bringing to Charlottesville, including, for example, particular helmets he thought Unite the Right ("UTR") participants should wear. (Ex. 2, 2017-08-03 Unicorn Riot ("UR") Discord Leak "Azzmador".) He celebrated having been made an official speaker for the events and posted a meme of Nazis in a car with the caption, "Get in loser, we're invading Charlottesville!" (Ex. 3, 2017-08-07 UR Discord Leak "Azzmador".) On Discord, he posted about violence – "[w]ell I also come barehanded and barefisted, be officers don't duck lol. But my guys will be ready with lots of nifty equipment" (Ex. 4, 2017-07-23 UR Discord Leak "Azzmador") – and he expressly hoped for a confrontation with African-Americans in Charlottesville: "I'm looking forward to BLM more than antifa. Blacks are the easiest people on Earth to trigger." (Ex. 2, 2017-08-03 UR Discord Leak "Azzmador".) Ray also posted in Discord: "I'll be there gassing these people" and that Unite the Right was "a war, not a party." (Ex. 5, 2017-07-18 Discord post by Ray.)

<sup>&</sup>lt;sup>2</sup> *Daily Stormer Book Clubs (SBC)*, ANTI DEFAMATION LEAGUE, https://www.adl.org/resources/backgrounders/daily-stormer-book-clubs-sbc.

<sup>&</sup>lt;sup>3</sup> *Id*.

<sup>&</sup>lt;sup>4</sup> *Id*.

Ray was also a leader on the ground. He came to Charlottesville with a group of white supremacists from Texas.<sup>5</sup> Ray arrived in Charlottesville before the torch-lit march on August 11, 2017, and took part in a planning meeting that day with other Defendants and co-conspirators. See SAC ¶ 27. Ray then participated in and livestreamed the events of that weekend for the Stormer site.<sup>6</sup> Throughout the weekend, Ray "liv[ed] up to his reputation." He "led shield-walls into clashes with counter-protesters and initiated loud chants of 'The Jews Will Not Replace Us!'"8 On August 12, 2017, Ray carried a banner that read "Gas the kikes, race war now!," which he later posted on Daily Stormer's website. SAC ¶ 201. Ray apparently brought his own cameraman to Charlottesville to capture the events, creating arguably the most powerful evidence of what went on that weekend. (Ex. 6, 2017-08-19 Daily Stormer post by Ray entitled "The Battle of Charlottesville Full Video!".) Saturday night, after Defendant James Fields had injured seven of the Plaintiffs in this litigation and killed Heather Heyer by driving his car into a crowd, Ray delivered at an after party a victory speech written by Anglin.<sup>9</sup> Addressing the crowd, Ray said, "[a] day is quickly coming [w]hen it is we who will be digging graves." In a podcast Ray hosts for the Daily Stormer website, "The Krypto Report," Ray aired an episode shortly after the events in Charlottesville and continued celebrating Charlottesville as a great success. 11 Ray stated, "[t]he street battles are symbolic. The important thing is to show that people aren't afraid to leave their

<sup>&</sup>lt;sup>5</sup> *Id*.

<sup>&</sup>lt;sup>6</sup> Zaitchik, *supra* note 1.

<sup>&</sup>lt;sup>7</sup> *Id*.

<sup>&</sup>lt;sup>8</sup> *Id*.

<sup>&</sup>lt;sup>9</sup> Zaitchik, *supra* note 1.

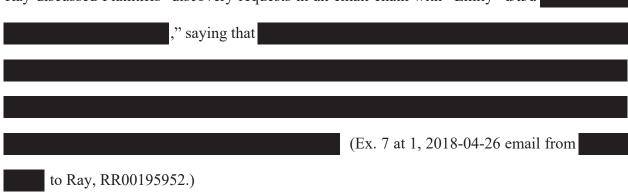
<sup>&</sup>lt;sup>10</sup> Daily Stormer Book Clubs (SBC), supra note 2.

<sup>&</sup>lt;sup>11</sup> Zaitchik, *supra* note 1.

house. We're coming out. We outnumber the anti-white filth. [In-real-life] meet-ups grow our movement by showing we're here."12

#### II. Ray Has Failed to Comply with His Discovery Obligations

Despite having been represented by counsel in this action from December 2017 to October 28, 2019, Mot. to Admit James E. Kolenich Pro Hac Vice, ECF No. 131; Order, ECF No. 583, Ray has failed to comply with even his most basic discovery obligations. Plaintiffs served their First Set of Requests for Production of Documents and their First Set of Interrogatories on Ray in January 2018 generally seeking documents, including e-mails, texts, social media content, and videos, relating to the events at issue in this lawsuit, and identification of devices and accounts used to communicate about the same. Pltfs.' Corrected First Set of Requests for Production, ECF No. 432-1; Pltfs' First Set of Interrogatories, ECF No. 432-2. Ray responded in April 2018 identifying a single email account, one cell phone, and five social media accounts he used to communicate about Unite the Right. Incredibly, however, he swore under oath that he had no responsive documents in his possession. Def. Robert Ray's Responses to Pltfs.' First Interrogatories and Request for Production of Documents, ECF No. 475-2. Around that same time, Ray discussed Plaintiffs' discovery requests in an email chain with "Emily" a/k/a



<sup>&</sup>lt;sup>12</sup> *Id*.

The disparaging attitude Ray exhibited in April 2018 toward this litigation has not changed over the course of discovery. After receiving Ray's deficient discovery responses, Plaintiffs engaged in months of correspondence and motion practice regarding the inadequacies of Ray's responses. In October 2018, Ray's counsel attempted to withdraw from the case. ECF No. 357. When that motion was denied, Ray's counsel opposed Plaintiffs' motion to compel imaging of Ray's devices and social media accounts. ECF Nos. 364, 367. Shortly thereafter, the Court granted Plaintiffs' Motion to Compel Defendants to Permit Inspection and Imaging of Electronic Devices. ECF No. 379 ("Nov. 13 Order"). The Court ordered Ray and other Defendants to identify electronic devices and social-media accounts containing potentially relevant documents and to provide relevant devices and account credentials to the Vendor. ECF No. 383 (the "Imaging Order"). While the deadlines in the Imaging Order came and went, Ray failed to complete the Certification called for by the Imaging Order or to provide his electronic devices and social media accounts and credentials to the Vendor.

When Ray eventually provided the Certification, he disclosed as the devices and accounts with potentially relevant documents one cell phone, two computers, and four social media accounts in addition to his Discord account. (Ex. 8, Ray ESI Certification.) Ray has since provided to the Vendor one cell phone, one of his two computers, and credentials to a single email account. According to the vendor, Ray claimed not to remember his credentials for any other account, and the vendor has never received Ray's second computer. (Ex. 9, excerpt of 2020-02-25 Vendor report regarding Ray's accounts and devices ("Vendor Report").) In total, along with the computer Ray has refused to provide, he continues to withhold credentials from a Gab account, his Krypto Report podcast, one or more Twitter accounts and/or handles, and the Daily Stormer website, and has failed to produce videos and photos of the Unite the Right events.

Although certain parts of Ray's accounts and websites are public, some key postings by Ray have been conspicuously removed or deleted. For example:

- An August 3, 2017, episode of The Krypto Report, posted on the Daily Stormer website, wherein Ray apparently discusses "[t]he upcoming Unite the Right event in Charlottesville" along with "the Commander of [Defendant] Vanguard America" has been made inaccessible to the public. (See Ex. 10, 2017-08-03 The Krypto Report Episode XXI: To Leave Something Behind (Charlottesville is Coming!).)
- A post on the Daily Stormer website from August 19, 2017, by Ray entitled, "The Battle of Charlottesville FULL VIDEO," which consists of three videos "from the viewpoint of [Ray's] cameraman's livestream," labeled by Ray as "the entire Unite the Right event, aka The Battle of Charlottesville. . " and "[u]ncut video from the ground, everything the Judenpresse won't show you[,]" is now inaccessible to the public. (See Ex. 6 at 1, 19, 2017-08-19 Daily Stormer post by Ray entitled "The Battle of Charlottesville Full Video!")
- A video posted by Ray to the Daily Stormer website on August 31, 2017, that purports to capture the violence that took place on August 11, 2017, has been rendered unavailable. Although the video itself is inaccessible, Ray captions the video as follows: "As you can see . . . we went through them like shit through a goose!" (See Ex. 11 at 5, 2017-08-31 Daily Stormer post by Ray entitled "The Road to Charlottesville and the Shuttening".)

Ray has not produced any of these highly relevant videos, and Plaintiffs are unable to access them from any other source. Moreover, Plaintiffs have uncovered evidence that Ray likely has additional photos and videos of the events August 11-12, 2017. Ray actively solicited and received files from regarding that weekend, which he has also failed to produce to Plaintiffs. (Ex. 12, 2018-04-2017 email notification of WeTransfer files from FireRize, RR00191687; 2018-04-13 email chain between Ray and RR00196123.)

#### **III.** Ray Continues to Withhold Devices and Account Credentials

Ray has refused to take seriously his obligation to participate in discovery in good faith and instead has actively resisted disclosing devices and accounts with potentially responsive information. On March 1, 2019, the Court ordered that all devices and social media account credentials be provided to the vendor by Friday, March 8, 2019. Mar. 1, 2019 Hr'g Tr. 18-19, ECF No. 441. On March 18, 2019, ten days after the Court's deadline for turning over all devices and account credentials, Plaintiffs wrote to the Court again, stating, in pertinent part, "Defendant

Ray has not provided one of his laptops or full credentials for three social media accounts: Gab.ai, Krypto Report (a podcast), and the comment section of the Dailystormer website, stating that he 'does not remember' either certain usernames or passwords associated with those accounts." (Ex. 13, 2019-03-18 email from M. Bloch to Judge Hoppe and others.) At the Court conference that afternoon, Ray's counsel made the following representations with respect to the each of the items in question:

The ESI vendor is aware of why Mr. Ray's laptop -- you know, he uses that for work, so when he gets the first one back, he will send the second one in, you know, when he has a day that he cannot do his particular line of work. This Gab, Kyrpto [sic] Report stuff, he doesn't have those pass codes. That's old stuff. He has the current Kyrpto [sic] Report password, so I'm not sure why they're saying that he hasn't provided that. And as far as the comment section for the Daily Stormer website, I don't understand that. You know, the ESI vendor did say that, that he said "does not remember." But that can't be accurate, because that's a thing that he uses currently with his job. So I'll run down why the ESI vendor is saying that. I have a call scheduled with them tomorrow, and we'll see -- you know, we'll get that squared away.

Mar. 18, 2019 Hr'g Tr. 12-13, ECF No. 455.

Mr. Kolenich later added, "*[i]t can't be right that he doesn't have Daily Stormer pass codes* for the media. The comment section, *that's something he uses on a daily basis*. That can't be accurate information." *Id.* at 13 (emphasis added). Notwithstanding Ray's assertion, relayed through his attorney, that he was simply awaiting the return of his first computer before sending in his second computer, Ray in fact had received his first computer back from the Vendor days before that excuse was given to the Court. (Ex. 14, 2020-02-28 email from K. Kim to K. Cheng and J. Phillips regarding FedEx tracking.) More recently, Ray claimed to have sent the Vendor his second computer in spring 2019, but the Vendor never received that device. (ECF No. 604-1 at 5, Oct. 18, 2019 email from M. Bloch.) Ray has provided no tracking information or further data on his alleged effort to send in the second computer.

Over the last 11 months, none of these issues has been "squared away." To the contrary, while Ray made one small production of documents on September 20, 2019, Ray has still failed to send his second laptop to the Vendor and has failed to provide credentials for any of the five social media accounts he disclosed. Plaintiffs noted these issues in an October 18, 2019, email to the Court, ECF No. 604-1, and they were addressed in a telephonic hearing the same day, Hr'g Tr. at 51-52, ECF No. 581. After the hearing, the Court ordered all Defendants, including Ray, to determine what specific additional information the Vendor would need to access social media accounts and devices within seven days and to turn over last known credentials for social media accounts within fourteen days, "regardless of whether the Defendant currently has access to the platform or whether an account is active, inactive, or inaccessible." Order at 2, ECF No. 582. Ray has made no effort over the last five months to comply with this Order. And the Vendor is still missing Ray's second laptop and account credentials, notwithstanding the fact that Ray still actively uses some of these accounts. Indeed, Ray has continued to appear regularly on the Krypto Report podcast – at least as recently as February 6, 2020 – while simultaneously denying Plaintiffs access to its responsive and highly relevant content. (Ex. 15, 2020-02-06 Daily Stormer post by Ray.) Ray's continued refusal to turn over these devices and account credentials leaves swaths of potentially responsive evidence entirely undiscovered.

#### IV. Ray Has Entirely Failed to Disclose Other Relevant Devices and Accounts

Plaintiffs have also discovered from documents in his own production and from other Defendants' documents that Ray has several additional devices and accounts that he never disclosed to Plaintiffs in his discovery responses or ESI Certification:

• A second cellphone that Ray told Defendant Cantwell to use on August 12, 2017. (Ex. 16, 2017-08-12 email between Ray and Cantwell, RR00200859.)

- A Skype account used regularly in 2017. (Ex. 17, 2017-02-16 email from Ray to RR00201027.)
- Two additional Twitter handles used to communicate with Defendant Nathan Damigo. (Ex. 18, Twitter notifications from Ray to Damigo, ND00039368, ND00036752.)

These devices and accounts are highly likely to contain responsive information. Ray appears to have been using this second cellphone *on the day of the Unite the Right rally* to communicate with another Defendant about the rally. (Ex. 16, 2017-08-12 email between Ray and Cantwell, RR00200859.) The fact that Ray has admitted that, in 2017, his Skype account was him and he makes his Skype account likely to contain responsive evidence that is not in his email account. (Ex. 17, 2017-02-16 email from Ray to RR00201027.) Ray also used the two undisclosed Twitter handles or accounts to correspond directly with at least one other Defendant in this case. (Ex. 18, Twitter notifications from Ray to Damigo, ND00039368, ND00036752.) Yet Ray did not disclose any of these devices or accounts to Plaintiffs as required by the Court's discovery orders, much less turn them over to the Vendor for imaging and processing. (Ex. 9, Vendor Report.)

#### **LEGAL STANDARDS**

"Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense and proportional to the needs of the case[.]" Fed. R. Civ. P. 26(b)(1). A party is entitled to request that another party provide "any designated documents or electronically stored information" that is in the producing party's "possession, custody, or control." Fed. R. Civ. P. 34(a)(1)(A). "As long as the party has the legal right or ability to obtain the documents from

another source on demand, that party is deemed to have 'control.'" *Poole ex rel. Elliott v. Textron, Inc.*, 192 F.R.D. 494, 501 (D. Md. 2000).

A "party is obligated to make a reasonable effort to search for and produce documents responsive to the opposing party's document requests." *Moore v. Napolitano*, 723 F. Supp. 2d 167, 173 (D.D.C. 2010). Attorneys must make a "reasonable effort to assure that [their] client has provided all the information and documents responsive to the discovery demand." *Poole*, 192 F.R.D. at 503; *see also Abadia-Peixoto v. U.S. Dep't of Homeland Sec.*, No. 11-cv-04001-RS (KAW), 2013 WL 4511925, at \*2 (N.D. Cal. Aug. 23, 2013) ("[A]ttorneys must take responsibility for ensuring that their clients conduct a comprehensive and appropriate document search." (citation and internal quotation marks omitted)).

#### **ARGUMENT**

### I. Ray Should Be Compelled to Produce Electronic Devices, Social Media Accounts, and Documents Responsive to Plaintiffs' Discovery Requests.

Under the Federal Rules, Plaintiffs are entitled to discovery into all non-privileged documents relevant to their claims and within Ray's control. Fed. R. Civ. P. 26(b)(1), 34(a)(1); *Poole*, 192 F.R.D. at 503. Defendants, including Ray, are required to "make a reasonable effort to search for and produce" such documents. *Moore*, 723 F. Supp. 2d at 173. Discovery may be compelled when a party has not been forthcoming and has failed to conduct a reasonable search. *See Selee Corp. v. McDanel Advanced Ceramic Techs., LLC*, No. 1:15-CV-00129-MR, 2016 WL 4546446, at \*3 (W.D.N.C. Aug. 31, 2016) (granting motion to compel keyword search of electronic data where the defendant had not attempted to locate certain responsive documents in its possession); *SMB Consulting & Investing, LLC v. Apple Valley Waste Serv., Inc.*, No. 3:11-CV-70, 2012 WL 13019007, at \*1–3 (N.D.W. Va. Sept. 25, 2012) (granting motion to compel and permitting forensic investigation of devices where the defendant had failed to comply with an

earlier discovery order); *see also Hosch v. BAE Sys. Info. Sols., Inc.*, No. 1:13-CV-00825 AJT, 2014 WL 1681694, at \*6 (E.D. Va. Apr. 24, 2014) (noting that multiple discovery orders compelling discovery, including submission of electronic devices for inspection, had been disobeyed in granting sanctions).

The Court has repeatedly ordered all Defendants, including Ray, to disclose and produce all electronic devices and email and social media accounts containing potentially relevant documents so that the Vendor can image those devices and accounts and collect responsive documents for production to Plaintiffs. See, e.g., ECF Nos. 379, 383, 582. However, instead of complying with those multiple orders and his obligations under the Federal Rules, Ray has withheld and steadfastly refused to produce or provide to the Vendor numerous devices and accounts that are non-privileged, undoubtedly relevant to Plaintiffs' claims, and highly likely to contain responsive materials. These include but are not limited to Ray's second laptop and five social media accounts listed on Ray's ESI Certification. (Ex. 8, Ray ESI Certification; Ex. 9, Vendor Report.) The Vendor returned Ray's first computer to him on March 14, 2019, (Ex. 14, 2020-02-28 email from K. Kim to K. Cheng and J. Phillips regarding FedEx tracking), but Ray has failed to provide his second laptop to the vendor. Nor has Ray explained why he is unable to provide account credentials for The Krypto Report when he continues to actively post on that site to this day. (Ex. 15, 2020-02-06 Daily Stormer post by Ray.) Ray also has not produced photo and video evidence of the Unite the Right rally that have now been suspiciously removed from the Daily Stormer website. (Ex. 6, 2017-08-19 Daily Stormer post by Ray entitled "The Battle of Charlottesville Full Video!")

In addition, Ray entirely failed to disclose additional devices and accounts he used to communicate with other Defendants in this case. That includes an undisclosed second cellphone

Skype account that Ray admitted in 2017. (Ex. 16, 2017-08-12 email between Ray and Cantwell, RR00200859; Ex. 17, 2017-02-16 email from Ray to RR00201027.) Ray also failed to disclose two additional Twitter handles or accounts that he used to correspond directly with Defendant Damigo. (Ex. 18, Twitter notifications from Ray to Damigo, ND00039368, ND00036752.) That the date for production of all documents has passed without disclosure of Ray's second cellphone or Skype account seriously calls into question the credibility of Ray's disclosures and what else may yet be missing.

It is thus apparent Ray has not satisfied his discovery obligations in this case. Ray is required to "make a reasonable effort to search for and produce" responsive documents. *Moore*, 723 F. Supp. 2d at 173. Regardless of the single small production made to date, he has failed to do so. Indeed, many of Ray's devices and accounts that are likely to have relevant information remain unsearched, depriving Plaintiffs of access to key evidence in this case. The Court should therefore compel Ray to produce to the Vendor for imaging and collection all electronic devices in his possession that may contain responsive material, including Ray's second laptop and undisclosed second cellphone. The Court should also compel Ray to produce to the Vendor the credentials for all social media credentials in his possession, including the credentials for each of the five social media accounts that he has disclosed, his Skype account, and the two additional Twitter accounts. Finally, the Court should order Ray to pay Plaintiffs' reasonable expenses, including attorneys' fees and costs, incurred in prosecuting this Motion. *See* Fed. R. Civ. P. 37(a).

#### **CONCLUSION**

For the foregoing reasons, Plaintiffs request that the Court compel Ray to:

1. Produce his second laptop, second cellphone, and any other electronic devices within his possession to the Vendor for imaging and collection.

- 2. Disclose his Daily Stormer, Krypto Report, Skype, Gab.ai, Twitter, and any other social media accounts and credentials within his possession to the Vendor for imaging and collection.
- 3. Produce immediately to Plaintiffs without the opportunity for Ray's review every document from his devices and accounts that hits on any search term agreed-upon by the parties.
- 4. Pay Plaintiffs' reasonable expenses, including attorneys' fees and costs, incurred in prosecuting this Motion.

Dated: March 11, 2020 Respectfully submitted,

/s/ Robert T. Cahill

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#### CERTIFICATE OF SERVICE

I hereby certify that on March 11, 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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Counsel for Defendants Michael Hill, Michael Tubbs, and League of the South I further hereby certify that on March 11, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

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 1

FILED UNDER SEAL

# EXHIBIT 2







Chris7577 FX 2017-08-03 13:36:59 UTC [Southern Front #general] Q. &

@Nathan TX Those look gay as fuck I just put a removable bump cap under my vanguard hat.



Kevin FL 2017-08-03 13:38:37 UTC [Southern Front #general] Q ♂

TWP? And yea we should get Kevlar or riot helmets



Azzmador 2017-08-03 13-39:14-UTC [Southern Front #general] Q &

You can get cheap motorcycle helmets on amazon that offer better protection and look a lot cooler.



Chris7577TX Case 3:17-cv-00072-NKM-JCH Document 673-2 Filed 03/11/20 Page 3 of 5 Pageid#: 9363 2017-08-03 13:40:51 UTC [Southern Front #general] Q 6

• Azzmador I like the idea of showing our faces. It makes us look better. In movies when they want to emphasize good guys vs. bad guys the bad guys always have covered faces.



Azzmador

2017-08-03 13:41:16 UTC [Southern Front#general] Q. 6

This one is DOT approved, and comes with goggles. Add a 3M gas mask and you're in business, https://www.amazon.com/TCMT-Leather-Motorcycle-Chopper-Cruiser/dp/B00X@Y&LLM/ref=sr 1 10?ie=UTF8&qid=1501767592&sr=8-10&keywords=german+motorcycle+helmet



Azzmador

2017-08-03 13:41:35 UTC [Southern Front #general] Q 6

I wan't recommending full face helmets



Azzmador

2017-08-03 13:43:36 UTC [Southern Front #general] Q 6

If you don't like the German style helmets like that there are other options, like this https://www.amazon.com/SmartDealsNow-Helmet-leather-German-approved/dp/801GIP99HU/ref=sr 1 30?ie=UTF8&qid=1501767743&sr=8-30&key.words=german+motorcycle+helmet



Azzmador

2017-08-03 13:44:04 UTC [Southern Front #general] Q &

Or this https://www.amazon.com/Fuel-Helmets-SH-HHFL65-Helmet-Medium/dp/B00843V9G4/ref=sr\_1\_34? ie=UTF8&qid=1501767825&si=8-34&keywords=german+motorcycle+helmet



Azzmador

2017-08-03 13:45:38 UTC [Southern Front #general] Q 🔗

This one is one pof my personal favorites. If you put a black sun on that star you'd really have something. https://www.amazon.com/Fatrninge-Goggles-Motorcycle-Cruiser-Scooter/dp/8014L36HLW/ref=sr 1 48?ie=UTF8&qid=1501767887&sr=8-48&keywords=german+motorcycle+helmet



Azzmador

2017-08-03 13:47:14 UTC [Southern Front #general] Q &

These DOT helmets are rated for high speed crashes, and will withstand some types of attacks other helmets won't, like say a bike lock. A batting helmet may not stand up to the kinetic energy of being struck by a tiny object with that kind of force. Motorcycle helmets will.



Azzmador Case 3:17-cv-00072-NKM-JCH Document 673-2 Filed 03/11/20 Page 4 of 5 Pageid#: 9364 2017-08-03 13:47:30 UTC [Southern Front#general] Q

Anyway, whatever type you get, helmets are a good idea.



Chris7577TX

2017-08-03 13:48:36 UTC [Southern Front #general] Q. &

I like these. Everyone gets to see my dashing good looks.

Linerz 1/8° Foam Protective Hat Insert Hat Liner Bump Cap Insert https://www.amazon.com/dp/B01DL0V8M@/ref=cin\_sw\_r\_other\_apa\_IMYGzbGSGPP88



SonderSchutz TX

2017-88-03 13:55:31 UTC [Southern Front#general] Q. &

http://m.ebay.com/itm/WWI-WW2-GERMAN-FALLSCHIRMJAGER-M38-BL ACK-STEEL-HELMET-With-Leather-Liner-/192076546930?nav=SEARCH



SonderSchutz TX

2017-0803 13:55:39 UTC [Southern Front#general] Q &

For that nice Jarp effect



SonderSchutz TX

2017-08-03 13:57:17 UTC [Southern Front #general] Q. &

Anyone know if theres a club law for Cville?



Azzmador

2017-08-03 13:58:24 UTC [Southern Front #general] Q. &

Yes, no clubs



Azzmador

2017-08-03 13:58:41 UTC [Southern Front#general] Q &

no masks either



Azzmador

2017-08-03 13:59:11 UTC [Southern Front#general] Q 6

I'll be posting an article on Daily Stormer in a few days that details what is legal to bring.



SonderSchutz TX

2017-08-03 13:59:40 UTC [Southern Front#general] Q &

Sounds good, what about pocket sand?



Azzmador

2017-08-03 13:59:57 UTC [Southern Front #general] Q 6

haha I didn't hear that



SonderSchutz TX

2017-08-03 14:00:10 UTC [Southern Front #general] Q &

Ahh antifa is fucked now



Azzmador

2017-08-03 14:00:47 UTC [Southern Front #general] Q 69

I'm looking forward to BLM more than antifa. Blacks are the easiest people on Earth to trigger.



Azzmador

2017-08-03 14:01:18 UTC [Southern Front #general] Q 6

I predict some gloriously hilatious chimping.



Nathan 1X

2017-08-03 14: 14:17 UTC [Southern Front #general] Q 6

Yeah that'll be great, @Azzmador any updates on the speaking situation?



Azzmador

2017-08-03 14:16:20 UTC [Southern Front #general] Q 6

I am officially a featured speaker at the event now.



Nathan 1X

20 1 7-08-03 14: 19:45 UTC [Southern Front #general] Q 6

Awesome

# EXHIBIT 3



### **EXHIBIT 4**



Azzmador
2017-07-23 07:07:53 UTC [Charlottesville 2.0 #questions\_for\_coordinators] Q

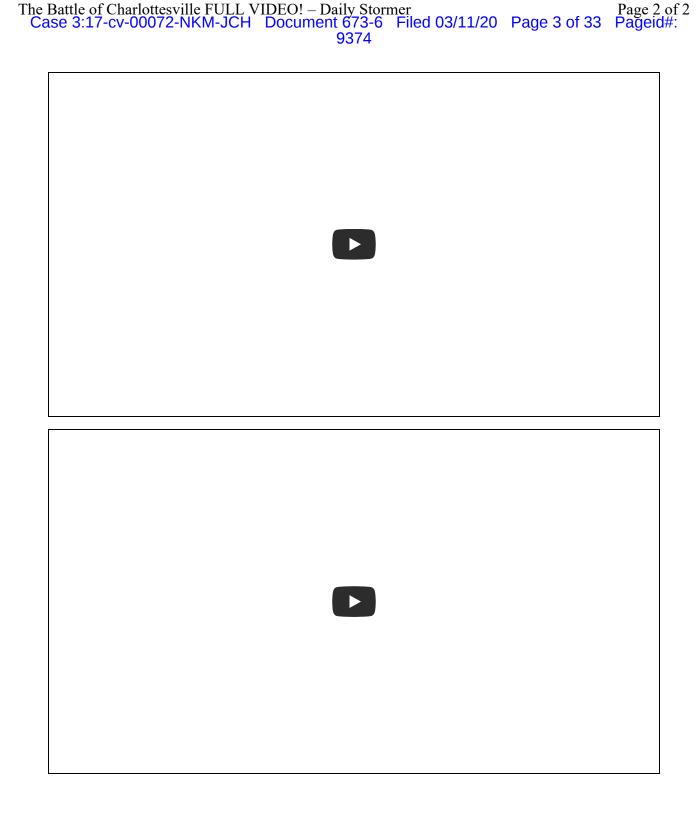
Well, I always come barehanded and bareheaded, bc officers don't duck lol. But my guys will be ready with lots of nifty equipment.

# EXHIBIT 5

username	createdTimestamp	content
Jason AW#4051	2017-07-18 12:28:04	Are you going to the unite the right rally?
Azzmador#6970	2017-07-18 12:37:04	yes
Jason AW#4051	2017-07-18 12:40:01	I was thinking about going but then I heard there will be fags, race mixers, and possibly jews there to support
Jason AW#4051	2017-07-18 12:40:02	I figured you would know about it more than me
Azzmador#6970	2017-07-18 12:40:02	get your ass there if you can
Azzmador#6970	2017-07-18 12:40:03	fuck all this dumb shit
Azzmador#6970	2017-07-18 12:40:05	there are 2000 antifa coming. You gonna represent?
Azzmador#6970	2017-07-18 12:41:02	I'll be there gassing these people. All that shitis an excuse.
Azzmador#6970	2017-07-18 12:41:05	You're never gonna find an event that only has people you like at it. This is a war, not a party.
Jason AW#4051	2017-07-18 12:42:00	2000 antifa? Wow.
Jason AW#4051	2017-07-18 12:42:00	Ok ill go.
Azzmador#6970	2017-07-18 12:42:01	good man
Azzmador#6970	2017-07-18 12:42:01	see you there
Azzmador#6970	2017-07-18 12:45:01	most of the Stormer editorial staff will be there. Vanguard America will be there with me, TWP will be there, League of the South will be there. We'll be doing live streams, interviews, the whole nine yards. Get everyone you can to come.
Jason AW#4051	2017-07-18 12:45:03	I will.
Jason AW#4051	2017-07-18 12:45:04	AW has had to remain low for awhile.
Azzmador#6970	2017-07-18 12:45:05	We'll handle these alt lites & proud boys 🌝
Jason AW#4051	2017-07-18 12:45:05	But ill get some guys there

# EXHIBIT 6

THE BATTLE OF CHARLOTTESVILLE FULL VIDEO!						
Azzmador						
Daily Stormer						
August 19, 2017						
Here it is folks, the entire Unite the Right event, aka The Battle of Charlottesville, or The Charlottesville						
Putsch, from the viewpoint of Azzmador's cameraman's livestream!						
If you weren't there, you will both enjoy the hell out of this video, and wish like hell you had been there!						



AZZMADOR

#### TKR Live: James Hake Interview!

Azzmador ① February 28, 2020



Another great meeting of the minds!

Read More »

TKR Live: State of the Union Special

♣ Azzmador ④ February 6, 2020



Tune in for the only State of the Union coverage that actually makes sense!

Read More »

TKR Live: Satan Bowl Special!



Azz and the Wrecking Crew give you a great alternative to sitting around getting fat, stupid, and feminine!

Read More »

The Krypto Report – Episode XCIV: The Dusky Prophet of the Tranny Apocalypse

Azzmador ODecember 4, 2019



Azzmador, Hate Farmer, and Tony Castle bring you this week's rundown of everything that matters!

Read More »

The Krypto Report Live: Azzmador and Jimmy Chang Interview Jesse Lee Peterson!

Azzmador O November 10, 2019

Azzmador and Jimmy have a very masculine interview with the man himself, Jesse Lee Peterson!



Read More »

# The Krypto Report – Episode XCII: Big Trouble in Little Zioland

♣ Azzmador ② November 4, 2019



The Holy Wars continue in this redo of episode 92!

Read More »

# The Krypto Report Live - NEOCON NIGHTMARE

♣ Azzmador ② November 2, 2019



Azz and Lee Rogers update you on the latest battles of the Great Groyper Uprising against Gorka's Orcas!

Read More »

# The Krypto Report Live – GROYPER HOLY WAR!

▲ Azzmador ② October 31, 2019



Azz, Lee, and Hate Farmer give you the skinny on the war between the Groypers and the fake conservatives!

Read More »

### The Krypto Report Live – RADIO WAVES with Lee Rogers!

Azzmador October 19, 2019



You asked, we delivered - the TKR Live broadcasts on Dlive here on Daily Stormer, this week with special guest Lee Rogers!

Read More »

The Krypto Report – Episode 90: GAMER UPRISING with Special Guest Ethan Ralph!

Azzmador October 8, 2019



Azzmador and The Wrecking Crew have a great time with Ethan Ralph!

Read More »

#### The Krypto Report - Episode 89: Environmental Zionism

Azzmador October 2, 2019



Another episode of the greatest thing to happen since people began talking into microphones!

Read More »

# The Krypto Report – Episode 88: FULL SPECTRUM DOMINATION!

♣ Azzmador ② September 24, 2019



Azzmador and the Wrecking Crew are joined by lee Rogers to celebrate episode 88!

Read More »

#### The Krypto Report – Episode 87: Jayoh in the Woodpile

▲ Azzmador ② September 10, 2019



A deep dive into an alleged International Man of Mercenary Mystery!

Read More »

#### The Krypto Report - Episode 86: Neon Knights

♣ Azzmador ② September 4, 2019



Azzmador and The Wrecking Crew DO IT LIVE once again!

Read More »

The Krypto Report – Episode 85: Skool Daze



This week, Azz and White Tuber take you on a magic ride through the inner workings of public school, mainstream media, civic engagement, straight pride, and Popeye's sammiches!

Read More »

#### The Krypto Report – Episode LXXXIV: Caught in the Crossfire

♣ Azzmador ② August 20, 2019



Azzmador and Hate Farmer bring you a LIVE REPORT from the front lines of the Alien Invasion!

Read More »

#### The Krypto Report – Episode LXXXIII: Loose End Tied



Azz and The Wrecking Crew discuss the mysterious death of a mysterious Jew and everything you need to know this week!

Read More »

#### The Krypto Report – Episode LXXXII: Danger at Your Door with Special Guest Andrew Anglin!

♣ Azzmador ② August 5, 2019



Andrew Anglin joins Azzmador and the Wrecking Crew for a FANTASTIC EXTRAVAGANZA! This is the one show you cannot miss this week!

Read More »

#### The Krypto Report – Episode LXXXI: Negro Fatigue Intensifies

Azzmador OJuly 29, 2019



Azzmador and The Wrecking Crew discuss all things related to black people participating in their lives!

Read More »

The Krypto Report – Episode LXXX: Born to Raise Hell!

Azzmador ①July 22, 2019



Azzmador and The TKR Wrecking Crew celebrate the octogenarian episode of TKR!

Read More »

#### The Krypto Report - Episode LXXIX: Eyes Wide Open

Azzmador • July 16, 2019



This week's TKR is a hard-hitting exploration of current events, and the perverse "masters of the universe" manipulating them!

Read More »

The Krypto Report – Episode LXXVIII: Activists, Sex Traffickers, and Voodoo Pajeets

♣ Azzmador ②July 9, 2019

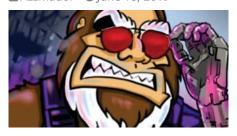


Azzmador and The Wrecking Crew return from their short hiatus with a vengeance!

Read More »

#### The Krypto Report – Episode LXXVII: The Bellicosity of Potato Men

♣ Azzmador ②June 18, 2019



Azzmador and The Wrecking Crew are joined by Lee Rogers for an indepth discussion of Iran, censorship, the Southern Border, and Clown World!

Read More »

# The Krypto Report – Episode LXXV: DIAMOND JUBILEE EDITION!

Azzmador • June 4, 2019



Azzmador and The Wrecking Crew butcher all of ZOG's sacred cows FOR THE SEVENTY-FIFTH TIME!

Read More »

The Krypto Report – Episode XLV: Better Late Than Never

Azzmador October 31, 2018





The Krypto Report - Episode XLIV: You Niggaz are Crazy!

Azzmador October 22, 2018



Gay Senators and NPCs and fake Indians, oh my!

Read More »

# The Krypto Report - Episode XLIII: Goyim Knowing Intensifies

Azzmador ② October 15, 2018



Another fabulous installment of the most problematic podcast in the history of these tubes!

Read More »

#### Stormer Book Club's "Operation SCOTUS" a Smashing Success!

Azzmador October 12, 2018



Watch this fat bitch moan about the Holocaust...!

Read More »

# The Krypto Report - Episode XLII: USA in this Hoe!

Azzmador October 9, 2018



For we wrestle not against flesh and blood, but against principalities, against powers, against the rulers of the darkness of this world, against spiritual wickedness in high places.

Read More »

The Krypto Report – Episode XLI: Indelible in the Hippocampus

Azzmador October 1, 2018



Your neural transmitters will never feel safe again!

Read More »

### SPECIAL SCOTUS EDITION! The Krypto Report – Episode XL: Revenge of the Sluts

♣ Azzmador ② September 27, 2018



These bitches belong in cages.

Read More »

# The Krypto Report – Episode XXXIX: View from Behind the Wall

♣ Azzmador ② September 24, 2018



Load the camps up and shade the lamps up!

Read More »

# The Krypto Report – Episode XXXVIII: Infostorming the Sportsballs

♣ Azzmador ② September 17, 2018



A riveting discussion of all the non-fake news that actually matters.

Read More »

# Stormer Book Club's "Operation Freeze Peach" Causes Horrified Hand Rubbing

♣ Azzmador ② September 10, 2018



Stormer Book Club vs. the (((Chinese Communists)))!

Read More »

The Krypto Report – EpisodeXXXVII

♣ Azzmador ② September 10, 2018



Vince of The Red Elephants joins Azzmador and the TKR Wrecking Crew™ for another fantastic voyage into American Nationalism!

Read More »

The Krypto Report – Episode XXXVI: Funeral for a Fiend

▲ Azzmador ② September 3, 2018



Azzmador and the TKR Wrecking Crew™ welcome special guest Not Shadowbanned Yet!

Read More »

The Krypto Report – Episode XXXV: Requiem for a Tumor

♣ Azzmador ② August 27, 2018



A celebration of the life and times of a noble tumor.

Read More »

The Krypto Report – Episode XXXIV: White Chalk

Azzmador • August 21, 2018



The TKR Wrecking Crew breaks down The Media War, and The Race War!

Read More »

The Krypto Report – Episode XXXIII: SkyKing, SkyKangz, and the Interdimensional Shapeshifting Child Molesters

Azzmador • August 14, 2018



TKR is back, bigger than life and twice as ugly!

PDX Stormers March Through Vancouver, Washington!

♣ Azzmador ②July 23, 2018



PDX Stormers out on the town!

Read More »

Omaha: Heroic Retard Rises in Opposition to Stormer Book Club's Enrichment of Little Free Libraries

♣ Azzmador ②July 21, 2018



Righteous Retard vs Stormer Shitlords: Who will win?

Read More >

The Krypto Report – Episode XXXII: Straight Outta Wompton!

♣ Azzmador ②June 25, 2018



Lee Rogers and Azzmador bring down the WOMP WOMP hammer on the week's top stories!

Read More »

Your Friendly Neighborhood Azzmador on BigCatKayla's Livestream

♣ Azzmador ②June 21, 2018



A wild Azzmador appears!

Read More »

Operation Back to Israel: Stormer Book Club Triggers Cuck Library

♣ Azzmador ②June 18, 2018



Stormer Book Club - making news, exposing Jews!

The Krypto Report – Episode XXXI: Hateposting with Larry Ridgeway

♣ Azzmador ②June 2, 2018



Azz interviews Larry Ridgeway of Hate House and Texan Barbaryan of Stormer Book Club on the only show that actually matters!

Read More »

Stormer Book Club's Operation White America a Smashing Success!



Stormer Book Club: Growing bigger, faster, stronger!

Read More »

Announcing Azzmador's Fantastic New Show "We're All Americans Here," with Co-Host Ricky Vaughn!

♣ Azzmador ② April 1, 2018



Winning is all that matters.

Read More »

The Krypto Report – Episode XXX: Dominion and Supremacy



Azz and Lee give their take on all the latest nonsense.

Read More »

Stormer Book Club Performs Nationwide Flyering, Jews and Colleges Cry "OY GEVALT!"



It's On!

# Critical Update on Stormer Book Clubs



**Azzmador and Andrew Anglin** | We're shifting into overdrive!

Read More »

#### God Emperor Contemplates Slaughtering Drug Dealers En Masse!

♣ Azzmador ② February 26, 2018



**Azzmador** | Yeah, it really is the only way. And just the obvious one.

Read More »

# DFW Stormer Book Club Exposes Treasonous Local College – Beaner Butthurt Ensues

▲ Azzmador ② February 5, 2018



**Azzmador** | DACA beaners BTFO'd!

Read More »

# The Krypto Report – Episode 29: Animating the Reich



**Azzmador** | Your Friendly Neighborhood Azzmador and Emily Youcis discuss her new magnum opus, "Waking Up."

Read More »

#### Calling All Stormer Book Clubs! Time for the Next Step!

▲ Azzmador ②January 28, 2018



**Azzmador** | Time to get this shoah on the road!

The Krypto Report Episode XXVIII - Pussyhats BTFO'd

▲ Azzmador ②January 23, 2018



**Azzmador** | TKR grabs Jewish feminism by the pussy!

Read More »

#### Waking Up (New Alt-Right Cartoon!)

▲ Azzmador ②January 23, 2018



**Azzmador** | Tomorrow's entertainment today!

Read More »

The Krypto Report: Episode XXVII – Tactical Navel-Gazing

▲ Azzmador ② January 15, 2018



**Azzmador** | Azzmador is joined by hi bro Microchip, world-renowned Trump-troll!

Read More »

The Krypto Report: Episode XXVI - Patriots Rising

♣ Azzmador ②January 11, 2018



**Azzmador** | Azzmador welcomes as his guest Thomas Rousseau, leader of Patriot Front!

Read More »

The Krypto Report: Episode XXV – Brainstormtrooping with Ricky Vaughn

♣ Azzmador ② January 8, 2018



**Azzmador** | Azz and Ricky Vaughn have a great discussion in the most important podcast of 2018 (so far)!

Unqualified Kike Appointed by Monkey Obongo Responsible for Seattle Trainwreck

Azzmador O December 19, 2017



**Azzmador** | The Jews did this

Read More »

Racist Niggerbitch Pitches Giant Chimpout at The White House

Azzmador ② December 14, 2017



**Azzmador** | Not a good fit.

Read More »

UPDATE: RIGGED!!! ELECTION STOLEN FROM ROY MOORE, EVIDENCE BEING DESTROYED!

Azzmador O December 13, 2017



**Andrew Anglin** | LIVE LIVE LIVE.

Read More »

Noble Hero Roy Moore is a True American Nationalist!

Azzmador ② December 11, 2017



Azzmador | Women and blacks btfo'd, Hitler quoted accurately

Read More »

Vaping Named Daily Stormer's Man of the Year for 2017!

Azzmador ② December 10, 2017



**Azzmador** | The vice of champions!

Fraudulent Negress Fakes Sign Language at Police Press Conference

Azzmador O December 8, 2017



**Azzmador** Talk to the hand. It say I dindu nuffins!

Read More »

# Brits Stuck with Infinity Illegal Brown People Forever

Azzmador ② November 30, 2017





**Azzmador** | Surrender first! That's good leadership!

Read More »

# Patriot Front's University of Texas Demo

▲ Azzmador ② November 8, 2017



**Azzmador** | Masked White men and torches OH NO!

Read More »

# Organized Beaners Attempt to Jew Virginia's Governor's Race

♣ Azzmador ② November 1, 2017



**Azzmador** | Latino Victory equals White Defeat.

Read More »

# Kike Legislator Goes Full Oy Vey on Traffic Cop

Azzmador October 29, 2017



**Azzmador** | Usually the Jew Jews you, but sometimes you Jew the Jew!

To Reclaim Our Sovereignty, Someone Has to Stop These Kikes

Azzmador October 23, 2017



**Azzmador** | The time to stop these kikes was yesterday.

Read More »

#### How the Jews Ruined Halloween

Azzmador ② October 21, 2017



**Azzmador** | The Great Pumpkin is the latest victim of the Holohoax

Read More »

The Krypto Report – Episode XXIV: American Nationalism Extravaganza!

Azzmador October 9, 2017



**Azzmador** | Azz and Lee on the only American Nationalist radio show that really matters.

Read More »

#### Colbert Asks Simian Journalist About the Joys of White Genocide

Azzmador October 4, 2017



**Azzmador** | Genocide is great, but only when it happens to White people

Read More »

Antifa Run Inside and Lock the Doors When Given Opportunity to Punch Nazis at "Punch a Nazi" Seminar



**Azzmador** | Obviously they couldn't punch any of the Nazis yet - they hadn't finished the seminar!

# Corrupt Political Negress Pays \$51K to Online Psychic

♣ Azzmador ② September 23, 2017



Azzmador | Nibbas gonna nib

Read More »

#### The Krypto Report: Episode XXIII - Meme Police

▲ Azzmador ② September 19, 2017



**Azzmador** | Emily Youcis joins the triumphant return of the mighty Krypto Report.

Read More »

#### "Free Speech" YouTube Alternative BitChute Censors Your Friendly Neighborhood Azzmador, Because Jews

▲ Azzmador ② September 11, 2017



**Azzmador** | #HandUpDontBitchute

Read More »

#### The Road to Charlottesville and The Shuttening

♣ Azzmador ② August 31, 2017



**Azzmador** | Can you handle the truth? because this is the truth!

Read More »

#### The Battle of Charlottesville FULL VIDEO!



**Azzmador** | Uncut video from the ground, everything the Judenpresse won't show you!

The Krypto Report – Episode XXII: The Charlottesville Putsch [UPDATE: RE-UPLOADED]



**Azzmador** | THIS AIN'T THE SUMMER OF LOVE!

Read More »

Charlottesville: Why You Must Attend and What to Bring and Not to Bring!

♣ Azzmador ② August 8, 2017



**Azzmador and (With Andrew Anglin)** | Everything you need to know about the new GREATEST THING EVER!

Read More »

The Krypto Report – Episode XXI: To Leave Something Behind (Charlottesville is Coming!)

♣ Azzmador ② August 3, 2017



**Azzmador** | Charlottesville, here we come!

Read More »

To Learn Who Rules Over You, Check Out This Illegal Alien Judge!

▲ Azzmador ② August 1, 2017



**Andrew Anglin** | Illegal immigrants who became judges through fraud have just as much of a right to judge Americans as anyone else.

Read More »

The Third Rail Ep. 18: Trans, the Windmill of Friendship and Deportation Squads, ft. Azzmador!

♣ Azzmador ②July 29, 2017



**Daily Stormer** | Lauritz and Spectre are joined by Your Friendly Neighborhood Azzmador. Peace and love ensue.

The Krypto Report: Episode XX - The Doctor is in!

Azzmador OJuly 27, 2017



**Azzmador** | Dr. Spectre prescribes Zyklon B

Read More »

#### Thunder

♣ Azzmador ②July 26, 2017



**Daily Stormer** | You need motivation? This will motivate you!

Read More »

# Infowars Fights the Tyranny of Apes in Dallas!

Azzmador • July 23, 2017



**Azzmador** | Government gorillas run amok!

Read More »

The Krypto Report: Episode XIX – SONIC ATTACK ft. The Mighty weev!

Azzmador Oluly 12, 2017



**Azzmador** | weev joins Azzmador, and brings the nigger-killing robots!

Read More »

# Replaced

Azzmador Oluly 9, 2017



**Azzmador** | We must secure the existence of our people and a future for White children.

The Krypto Report: Episode XVIII - I am HanAssholeSolo!

♣ Azzmador ②July 9, 2017



**Azzmador** | A wild Anglin appears!

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The Krypto Report: Episode XVII – White America

Azzmador OJuly 2, 2017



**Azzmador** | The White Man marches on!

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# Sheboon Ice Cream Lovers Go Full Ape at Mickey D's

♣ Azzmador ②June 29, 2017

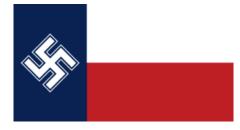


**Azzmador** | They're just like us in every way...

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#### Texas is Ours Event Report!

♣ Azzmador ②June 19, 2017



**Azzmador** | Texans take a stand!

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#### TEXAS IS OURS Ft. Azzmador LIVE in Austin: Event Over

Azzmador ①June 17, 2017



**Azzmador** | Seriously, this stream is great. Turn it on. This is history happening in real time.

SPLC Kikes Pull Their Own Article on the Nazi vs. Oath Keep Encounter

♣ Azzmador ② June 16, 2017



**Azzmador** | Why did the Jews pull their own article?

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# The Daily Stormer Houston Blitzkrieg!

♣ Azzmador ②June 12, 2017

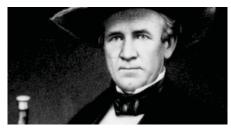


**Azzmador** | No Limit City will never be the same again.

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# Update on the Daily Stormer Houston Blitzkrieg THIS SATURDAY!

♣ Azzmador ② June 8, 2017



**Azzmador** | It's time to make a stand!

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The Krypto Report: Episode XVI – Ghost Riders in the Sky

♣ Azzmador ②June 7, 2017



**Azzmador** | Azz and Goy Orbison gas the kikes.

Read More »

Join Azzmador and Vanguard Texas at the Daily Stormer Houston Blitzkrieg THIS SATURDAY!

♣ Azzmador ②June 5, 2017



**Azzmador** | If you're in the area, you don't have a choice.

Negro NJ State Troopers Abuse Their Official Status to Hit on Wimmens

♣ Azzmador ②June 1, 2017



**Azzmador** | It's dey police cultchah

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Roving Band of Bull-Fruits Gang-Rape Mentally Disabled Man in Public Park

♣ Azzmador ② May 31, 2017



**Azzmador** | Biblical levels of faggotry.

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The Krypto Report: Episode XV – The Year of the Wolf

♣ Azzmador ② May 29, 2017



**Azzmador** | Wolf, meet Sasquatch.

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#### Berkeley Bike Lock Bastard Finally Arrested!

♣ Azzmador ② May 26, 2017



**Azzmador** | He thought he was going to collect the Tax on White Skin, but instead, he will be paying the White Skin Tax, in prison!

Read More »

British Teenager "Penetrated in Every Single Orifice" by Moslem Invaders

♣ Azzmador ② May 25, 2017



**Azzmador** | This is how a race commits suicide.

### BASED Indonesians Enact Common Sense Faggotry-Discouraging Measures

♣ Azzmador ② May 23, 2017



**Azzmador** | These Islamo-Gooks may be onto something.

Read More »

The Krypto Report: Episode XIV - All Out of Bubblegum

♣ Azzmador ② May 22, 2017



**Azzmador** | Turns out the Jews really were behind it...

Read More »

# Grooming Victim Recounts Authorities Enabling Her Ongoing Abuse

♣ Azzmador ② May 15, 2017



**Azzmador** | At least they weren't racists...

Read More »

#### The Krypto Report: Episode XIII – An Old Unreconstructed

♣ Azzmador ② May 14, 2017



**Azzmador** | Azzmador discusses the Boston Free Speech event and the Charlottesville protest against the removal of the local Robert E. Lee statue, and then is joined by Caerulus Rex, who was at the event.

Read More »

#### ACLU Helps Texas Keep Out Non-Whites

♣ Azzmador ② May 14, 2017

**Azzmador** | Now if we could just get that wall...



Wild Ape "Professor" Endorses Killing White People

▲ Azzmador **②** May 14, 2017



**Azzmador** | This is why we can't have nice things.

Read More »

Antifa Fags Up and Arms Up! Neo-Nazis are Shaking in Their New Balances!

♣ Azzmador ② May 11, 2017



**Azzmador** | R U sure?

Read More »

Alex Jones' Jew Wife Jews Him Intensely (Again)

♣ Azzmador ② May 10, 2017



**Azzmador** | Fucking stupid Jew bitch. She used the Joker make-up video.

Read More »

The Krypto Report: Episode XII – Azz Takes Your Questions



**Azzmador** | It's back!

Read More »

#YouWillNotReplaceUs: Flyers Rustle Jimmies Nationwide

♣ Azzmador ② May 6, 2017



**Azzmador** | For those about to flier: WE SALUTE YOU!

Read More »

Germany: Asylum-Seeking Dune Monkey Throws Dune Monkess Out of Window Because No Fikki Fikki

Azzmador OMay 6, 2017



**Azzmador** | Yeah but it's their culture tho...

Read More »

#### Radio Wehrwolf: The Return of Azzmador



**Dion Wehrwolf** | Azzmador stops by to discuss the lawsuit against The Daily Stormer by the SPLC, antifa, BLM, and more.

Read More »

#### Azzmador's Quivering Antifa Victim Never Heard of Venezuela

Azzmador • May 3, 2017



**Azzmador** | Remember, wherever gay homo commie perverts in masks try to hide, Your Friendly Neighborhood Azzmador will be there to expose them!

Read More »

Donating to the Daily Stormer Legal Defense Fund is Your Duty as a White Man



**Azzmador** | YOU HAVE A DUTY!

Read More »

#### BASED Oathkeepers are Lolbergtarian Antifa

Azzmador OApril 29, 2017



Read More »

### Happy Birthday, My Leader

♣ Azzmador ② April 20, 2017



**Azzmador** | Today, we remember.

Read More »

# Street Shitter Pleads Guilty to Mass Scale Phone Jewing

♣ Azzmador ② April 19, 2017



**Azzmador** | Finally, a little bit of justice up in here.

Read More »

### The Krypto Report Episode XI – A Curious Case of Undue Influence

♣ Azzmador ② April 17, 2017



**Azzmador** | Azzmador welcomes Lee Rogers, the publisher of the fantastic website Infostormer.com!

Read More »

#### The Krypto Report: Episode X – March or Die

♣ Azzmador ② April 10, 2017



**Azzmador** | Azz flies solo, and the entire show centers around Trump's missile attack on Syria and the program to oust Assad.

Read More »

### Drunk on Their Own Kool Aid, Jews Protest Themselves at AIPAC

**Azzmador** | Jews are Jewing their own selves...!





### Anti-Semitic Artificial Intelligence Accurately Assesses Awesomeness



**Azzmador** | Finally, AI is stepping up to the plate to do our thinking for us.

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# The Krypto Report: Episode IX – The Trump Effect

Azzmador March 27, 2017



**Azzmador** | The only podcast that ever mattered.

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# Trumpenkriegers Physically Remove Antifa Homos in Huntington Beach

♣ Azzmador ② March 26, 2017



**Azzmador** | tfw antifa gets its face pounded in by a mob offering them helicopter rides

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# The Third Rail: Episode 2 – The Fash in Fashion



**Daily Stormer** | This week The Third Rail's panelists are joined by special guest Richard Spencer.

Read More »

Liverpool: Jew Shia La Boof's HWNDU Atrocity Shut Down for the Fourth Time

**Azzmador** | Try putting it in Israel, Shia.

Read More »

# International Jews Court Spics to Ensure Eternal Subversion of American Goyim



**Azzmador** | Super double-teamed by a pack of greasy rats!

Read More »

# Tom Brady's Super Bowl Jersey Recovered – Culprit is Filthy Mexican Journalist



**Azzmador** | Wily rat smdh.

Read More »

# The Krypto Report: Episode VIII – Three Hours in the Death Camp



**Azzmador** | TKR welcomes Lauritz von Guildhausen of The Third Rail, the fantastic new show which debuted this weekend, and the famous "Minutes from the Death Camp."

Read More »

# The Third Rail: Flight 1488



**Daily Stormer** | The pilot episode of The Third Rail, the fastest yet longest hour in AltRight podcasting.

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Never Help Negroes! Good Samaritan Stomped and Robbed at Chicken Joint



**Azzmador** | This is why you should never buy fried chicken for the blacks.

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The Krypto Report - Episode VII: Adventures in Diversity



**Azzmador** | Azzmador and Caerulus are joined by Tom, the Vice Commander of Vanguard America.

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Trump Supporters Face Off Against Paid Communist Agitators Nationwide



**Azzmador** | Weren't these people supposed to move to Canada?

Read More »

The Krypto Report: Episode VI – Hey Tyrone, Whatcha Doing?



**Azzmador & Caerulus Rex** | The Krypto Report welcomes back Matt Heimbach of the Trad Workers Party and Trad Youth.

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"Demon Possessed" Primate Performs Ooga Booga Dance in Brazilian Hospital



**Azzmador** | Yeah, don't watch this while eating. Or if you're planning on sleeping. Ever again.

Read More »

Daily Stormer (Non) State of the Union Response

# 3/9/2020 Case 3:17-cv-00072-NKM-JCH Document 67/3 of - File dt 03/11/20 Page 33 of 33 Pageid#: 9404



**Azzmador** | Anglin and Azzmador are joined by the Alt-Right's #1 rising star, Beardson Beardly of Honeypot Studios, to discuss Glorious Leader's SOTU address.

# Celebrating Non-Whites in Public Service for Watermelon History Month

▲ Azzmador ② February 28, 2017



**Azzmador** | Black people invented watermelons.

Page 1 of 2

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# THE KRYPTO REPORT — EPISODE XXI: TO LEAVE SOMETHING BEHIND (CHARLOTTESVILLE IS COMING!)

Azzmador

**Daily Stormer** 

August 3, 2017



On this episode of The Krypto Report, Azzmador welcomes as his guest Thomas, the Commander of Vanguard America.

#### Topics:

- Your Friendly Neighborhood Azzmador IS speaking at the event as a featured speechifier!
- The Joys of Vaping
- Glorious Leader is creating a VAPE NATION!
- The wall is getting built
- Illegals are self-deporting to Canada at breakneck speed
- Vanguard America, their views, their goals, and what they do.
- Thomas' personal history, and how he came to the Alt Right
- What is a nation, and do we live in one?
- The upcoming Unite the Right event in Charlottesville
- The Daily Stormer meet and greet at the event

Oops, we couldn't find that track.

#### **VANGUARD AMERICA'S OFFICIAL WEBSITE**

#### **VANGUARD AMERICA'S OFFICIAL TWITTER ACCOUNT**

Contribute to The Krypto Report via bitcoin – 1HdRweRho7KFhBmyQTcDyTvpEDNjYHGugH



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### THE ROAD TO CHARLOTTESVILLE AND THE SHUTTENING

Azzmador

**Daily Stormer** 

August 31, 2017



By now you've all seen many videos and news stories about the #UniteTheRight event in Charlottesville that happened on Saturday, August 12th, 2015, which is now the pinnacle event of what is known by some as The Summer of Hate, or, my new preferred sobriquet, The Summer of Fascism. Either term is fitting, as has been exactly fifty years since the vaunted "Summer of Love" that basically consisted of a pack of perverted, Cultural Marxist Jews manipulating a few million spoiled brats into rebelling against Mommy and Daddy by embracing free love," meaning irresponsible, random sex with a false claim of no consequences, experimentation with all forms of mind altering drugs, silly eastern mysticism, communism in many forms, including violent terroristic insurrection as seen in many groups such as The Weather

Underground and The Symbionese Liberation Army, and as many other forms of degeneracy as you can possibly imagine.



Do the world a favor and KYS, hippie. Your time is over.

So, on to my personal recollection of the events.

I was a scheduled speaker for the event. The plan was to arrive Friday, early enough for the torch walk, get settled in at the large airbnb we had rented which would sleep twenty, and where I would be able to get set up for the historic podcast I had been plotting since first learning of the event. So Thursday afternoon, I was picked up at my house by the State commander of Vanguard Texas, who were kind enough to offer me a ride all the way there and back. The two of us proceeded to Texarkana, where we met up with my guys from the DFW Stormer Book Club and many members of Vanguard and several other groups. We met at a Chik-Fil-A and had a bite to eat while waiting on stragglers. Finally, close to sunset, we had everyone together and ready to go as a caravan.



### Azzmador's crew is best crew, always!

First, we proceeded to the nearest Wal-Mart, just across the Arkansas border to purchase a bunch of tiki torches and tiki torch fuel. Several of the crew bought various other necessities. This Wal Mart was in a highly Negro-enriched part of Texarkana, and it was funny to see the reaction of the dindus to a large group of Whites wearing fashy shirts and openly making racial remarks and laughing and having fun, with no fear at all. It was quite the comeuppance for these dindus, and they reacted mainly by being scared and confused.

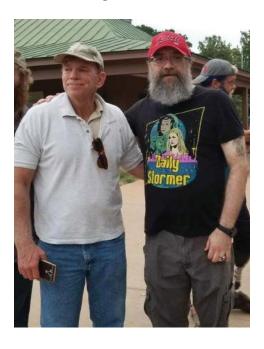
### As we went back to the trucks and vans, the first sign of The Shuttening reared it's ugly head.

Despite having the airbnb rented by a young lady with no online evidence she was in any way associated with the Alt Right, we received notice that the airbnb had been cancelled, one day before check-in time, and the money would not be refunded until fifteen days later.

Now, such underhanded shenanigans will never deter a group of good fascists, so a couple of Vanguard guys got on the phone and I got on Expedia and we rented rooms for everyone in the next town over. Problem solved.

The rest of the trip there was pretty uneventful, and I enjoyed the beautiful scenery. My anticipation and excitement grew ever greater as we neared our destination.

Finally, on Friday afternoon, we arrived, quickly got everyone settled in, and My SBC bros and I headed over to McIntire Park for the planning meeting. There were all manner of Alt Right personalities there. I met Christopher Cantwell, Eli Mosley, Zeiger and his hardy band of French Canadians, and many more. That was fantastic, but the real treat was meeting the man himself, Dr. David Duke!



### A historic day!

As many of my readers and listeners are aware, I had been a fan of Dr. Duke since I saw him on a local news station's interview show at the tender age of nine or ten (I remember the year, just not what time of year), and I don't mind telling you, this was an item ticked off my bucket list.

We had a very productive planning meeting, and at it's conclusion we all headed over to the University of Virginia for the much anticipated Torch Walk. I knew this thing was going to be glorious, but no one, including yours truly, could have possibly anticipated how extremely glorious it would be!



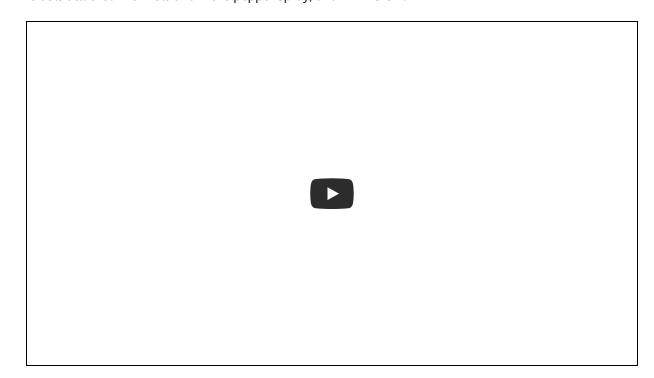


As you can see, there were way more than the 100 to 120 people the judenpresse initially tried to Jew everyone into believing. Official estimates say it numbered between 500 and 600, but judging by the aerial drone footage, I wouldn't be surprised if the number wan't higher.

Despite the police having assured us they would not allow counter-protesters to block our path, which would certainly have been the prudent thing for public officials to do, so as to avoid the violence that these degenerate anti-White anti-Americans always attempt to cause, there was almost no police presence, and the few who were there were standing way off to the side, watching and doing nothing as a bunch of these commie critters blocked a monument directly in our path.

They had their arms linked, chanting "Black Lives Matter" and "No Nazis, No KKK, No Facist USA!" over and over like the mindless morons they are. I was right in front facing them, and this mustachioed, bespectacled Jew who was standing in the front of his group chanting suddenly noticed me and grabbed the guy next to him and said "there he is, that's Azzmador!"

At that precise moment I felt pepper spray hit my right forehead and cheek. Thanks to my glasses, and the fact that I've been sprayed enough times that I'm able to suppress the instinct to try to wipe it off with my hands, I was neither blinded nor deprived of my breath, and the extreme burning sensation merely brought out my inner Sasquatch at ever greater power levels! At that same instant, several of the other leftists attacked with fists and more pepper spray, and IT WAS ON!



As you can see, just like I said before, we went through them like shit through a goose!

As my guys were pulling me out of the fray I saw Chris Cantwell, covered in pepper spray, blinded and burning up, but still laughing and in good spirits. I grabbed him by the arm and said "Chris, it's Azz, come with us," and we led him over to a bench where a cop was telling everyone who had been sprayed with OC to sit and await first aid.

After about 20 minutes, when no aid was coming, at least from the cops, and one of our guys got him into almost normal shape by pouring water on him, I suggested we leave the bench, as it seemed fishy that they would just have us sit there forever. We reveled with the crowd for a while and decided to head back to the motel and get some rest for the next big day.

On the way back, I go a call from one of my Texas guys. They had parked in a church parking lot, and antifa had come by and broken out every single window in the rental van. How do I know it was antifa? They left a note saying it was them! Fortunately, one of these drug addled idiots thought it would be a good idea to punch out the windshield with his fist. Copious amounts of his or her or it;'s blood and flesh were left on the jagged glass.





Of course, this caused no harm to anyone but the rental van company and the idiot who broke the windshield. The van had rental insurance, so one quick call to the agency and another vehicle was delivered to the site of this crime post-haste.

The next morning was rally time!

We got to McIntire park early so as to make sure and get parking spaces there, as there was armed security present to ensure that no such vandalism would occur that day.

The event was very organized at this point. There were many shuttle vans dropping people off and returning to load up again.

It was at the drop-off point that I realized how badly the city and it's worthless police department had purposely screwed us. Rather than cordon off the street in front of the rally itself, they made us all get out several blocks away and walk past protesters all the way to the park. At the street in front of Lee Park where the entrance was, we were met by a crowd of screeching leftist flotsam and jetsam, who thought they were going to block our entry. They thought wrong. They basically either got out of our way or folded up with little to no resistance as we forced our way through. Cornel West, along with a few lesbian "ministers" and a muzz or two, was standing at one entrance, arms lined, as though that would stop us. We went right through it, and I gave this affirmative action dindu professor a few choice words, inches from his face. He was so scared, I'm sure he needed new underwear.



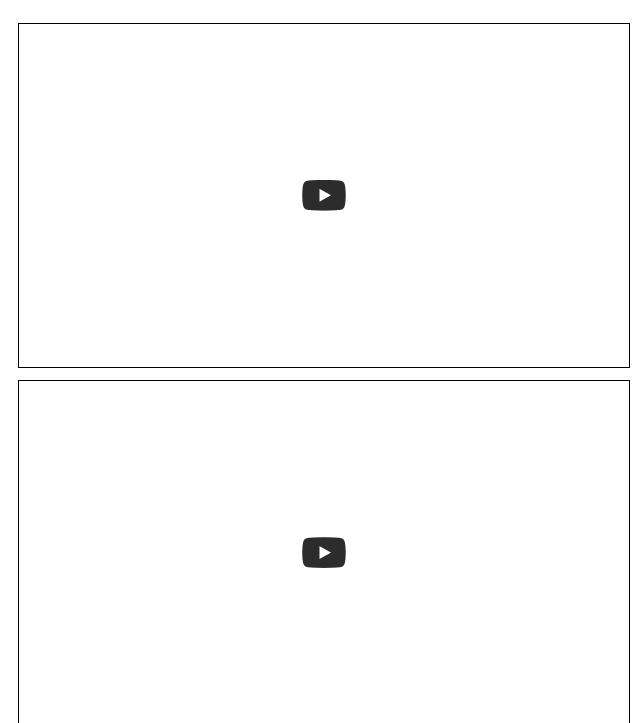
I beez a pahfessah! I beez gone stop you rayciss peoples!

This was part of the area we had a permit for, in fact, it was the area where the statue and the microphone was located, but it was gated off from the other half of the park, and informed that we were not allowed in there until noon, when the event was scheduled to begin. When we asked how they wanted us to get into the other half of the park where the other rally goers were forced into a triangular pen like cattle in a feed lot, the cops directed us back the way we came in, which meant we had to go back through the satanic preachers and walk another block past the opposition, who didn't try to get in front of us and stop us this time, but who stood a foot or so away from us and began spitting, throwing urine and feces, pepper spraying, and attacking with acid. Fortunately, spit was the worst thing I endured, and I don't think anyone in my particular group got any worse than that, but many others did.

As we entered the park, escorted in past the men of Vanguard America and Identity Europa who were preventing the commies from bum-rushing the event, I heard many people cry out "AZZMADOR!!" I must have shaken a thousand hands that day, and signed many autographs, several of them on copies of Mein Kampf, and took loads of pics with Daily Stormer fans. It was a great feeling. It really hit home tome for the first time that day what a huge effect our work here at Daily Stormer has had on so many fine people, and I was simultaneously honored and humbled by it.

We then began The Daily Stormer Experience! I began speaking to the viewers of the livestream, and Zeiger, Lee Rogers, and Ben Garland joined me. We had Jason Kessler speak to the Stormers, and Dr. David Duke addressed you all twice. He and I had a great, albeit short, talk about Jews and how they are our foremost problem. Everything was going along swimmingly.





Then, just as they called the speakers to come over by the microphone to prepare for the speeches, suddenly all the cops no one could find when they were needed to keep the peace announced that our event had been declared an "illegal assembly."

Bear in mind that we had gotten a permit for the event, then the city canceled the permit, then, with the help of the ACLU, got a federal magistrate to force them to honor the permit. The rule of law and the constitution are certainly dead.

Despite the attendees moving out of the park immediately, slowed only by confusion as to which way to go and where, the police began battering them with clubs, shields, and tear gas immediately.

As we were leaving the park, I saw Chris Cantwell, pepper sprayed again!

We had to march past a much more violent crowd of leftists this time. The Negroes were agitating for violence and in many cases, they got it. Vice was following along, and when we got to a spot where the vans could come get us, they jumped in with us! What a bunch of presumptuous turds!

Cantwell and my guys wanted to throw them out, but I had a plan. I said it was okay, then informed Ellie Reeve that if she didn't interview me, I was throwing them out to the debauched commies, hungry for blood.

She interviewed me.

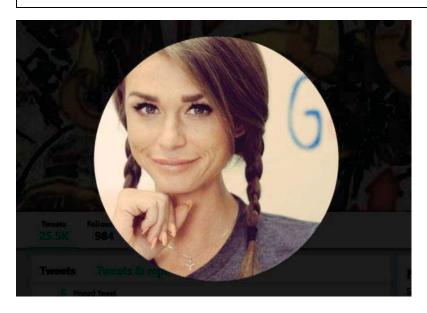


Later that evening, at the very last minute, we found a spot to record the historic, greatest podcast in the history of podcasts! We got all my equipment together and headed to an airbnb that had somehow not been canceled, and got everything set up as quickly as possible. Many have complained about the sound, but let me tell you, my sound guy had never seen my mixer or any of the other equipment before, and this place had no internet, nor was it a good recording environment. The place had no internet, so he figured out a way to get Andrew Anglin and weev on via cell phone, and the fact that he was able to even make anything work at all was a testament to his skill.

This was the show that got Faith Goldy fired.

Ezra Levant: Why we had to say goodbye to Faith Goldy





From now on, she will be known as FASH GOLDY!

It's really too bad that (((Levant))) Jewed her in such a despicable manner, but Jews gonna Jew, amirite?

At any rate, we had a fabulous show, and a great time was had at the afterparty that was going on all around us.

Then one more night in the hotel and it was back to Texas.

This event was a huge victory for the Alt Right. Don't believe any of the crap the MSM is peddling. Have a look for yourself and you decide.

This is just the beginning.

### **HAIL VICTORY!**



### TKR LIVE: STATE OF THE UNION SPECIAL

Azzmador

### **Daily Stormer**

February 6, 2020



On yet another SPECIAL EDITION TKR live, Azzmador and Tony Castle give you the legendary, award-winning, Earth-shattering REAL NEWS coverage you've come to expect from TKR! The SOTU will never be the same again!

00:00 00:00

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### Topics discussed:

- Azzmador's thoughts on Rush Limbaugh in the wake of his cancer diagnosis
- · Apollonian as a son of a bitch!
- Trump has press luncheon, excludes CNN
- So what's really up with this impeachment, anyway?
- Legendary Limbaugh bit, "Barack the Magic Negro"
- · Lampooning of the cringe parts
- · Azz sings Johnny Rebel at Tuskegee Airman
- · Azzmador's novel plan to convert Kristen Sinema to the right wing

- Donkey Bitch nowhere to be found, rumored to be banging donkey in Tijuana
- Trump promises to give Azzmador fast internet
- Who is this weird skank doing the Democrat response?
- Q&A with the chat

And much, much more!

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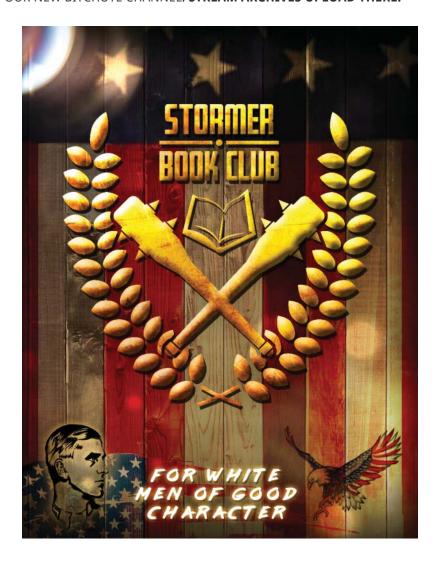
TKR Live FRIDAY NIGHT SPECIAL streams every Friday night at 10 PM EST, 9 PM CST, 7 PM PST on Dlive



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### Thank you for listening!

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