


Sines v Kessler

 Froelich, Samantha (Vol. 01) - 03/09/2020

1 CLIP (RUNNING 01:34:44.336)

 Froelich Designations



SF01

81 SEGMENTS (RUNNING 01:34:44.336)

1. PAGE 4:23 TO 4:25 (RUNNING 00:00:11.515)

23 SAMANTHA MARIE FROELICH, having been
24 first duly sworn, was examined and
25 testified as follows:

2. PAGE 6:25 TO 8:09 (RUNNING 00:01:08.081)

25 Q. Ms. Froelich, how old are you?
00007:01 Samantha M. Froelich
02 A. I'm 30.
03 Q. And what is your educational
04 background?
05 A. High school completion.
06 Q. Are you currently employed?
07 A. Yes.
08 Q. And generally speaking, what line
09 of work are you in?
10 A. I'm in the hospitality industry as
11 well as retail.
12 Q. Are you familiar with the
13 Alt Right?
14 A. Yes.
15 Q. And what is the Alt Right?
16 A. The Alt Right is a large umbrella
17 of various organizations that hold mainly far
18 right and white supremacist ideology.
19 Q. And did you ever -- did there ever
20 come a time when you considered yourself to be
21 a member of the Alt Right?
22 A. Yes.
23 Q. And when was that?
24 A. I was an official member of the
00008:01 Alt Right from, I think, December 31st, 2016
Samantha M. Froelich
02 to the end of October, maybe the 18th or 19th,
03 of 2017.
04 Q. Okay. And so how long was that
05 that you were a member of the Alt Right?
06 A. Roughly ten months.
07 Q. Do you consider yourself to be a
08 member of the Alt Right today?
09 A. Absolutely not.

3. PAGE 8:19 TO 9:19 (RUNNING 00:01:10.983)

19 Q. Can you explain how you became
20 involved in the Alt Right?
21 A. Yeah. I had a boyfriend and we
22 were deeply in love and something happened.
23 We had separated for about a year, a year and
24 a half; and in that time, I was doing all
25 kinds of things, rebuilding my social life,
00009:01 Samantha M. Froelich
02 rebuilding myself. It was -- it was a family
03 situation that I was dealing with, an internal
04 thing.

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05 When he and I reconnected, his
06 general tone, I guess I would say, was much
07 darker. I remember telling my family that I
08 felt like I was living with a ghost. And he
09 would say things to me that didn't make any
10 sense. He would speak this language that I
11 didn't understand, and one day I confronted
12 him. He told me he was a fascist and that he
13 didn't want to be with anyone who didn't
14 support that.

15 And that year and a half that I
16 had spent, I was -- I was determined to be
17 good enough for him. And so I looked into
18 whatever he was believing and I -- I dove in.
19 I just wanted his approval so badly.

4. PAGE 14:14 TO 14:23 (RUNNING 00:00:32.358)

14 Q. You mentioned that you no longer
15 hold these extreme beliefs; is that right?

16 A. Yes.

17 Q. How do you feel about the fact
18 that you at one point did hold these beliefs?

19 A. Honestly, I'm really embarrassed
20 and I carry a lot of guilt and shame with me
21 about the fact that I -- I wish I -- I wish I
22 knew and loved myself enough to walk away from
23 it. It was -- it's so embarrassing.

5. PAGE 14:24 TO 16:04 (RUNNING 00:01:21.040)

24 Q. Did you ever become a member of
25 any particular group within the Alt Right?

00015:01 Samantha M. Froelich

02 A. Yes.

03 Q. And which group was that?

04 A. Identity Evropa.

05 Q. And how did you come to learn
06 about Identity Evropa?

07 A. While I was consuming all of that
08 media, I saw a video with Nathan Damigo on The
09 Young Turks and he was talking about how he
10 loved lumpia but he loved white people more.
11 And he was calm, collected, and that gave me
12 the impression that this group that he was a
13 leader of was not actually like this -- you
14 know, like the other groups, I guess. It
15 was -- it was a group that I could get behind.

16 Q. You said you had the impression
17 that this group was not like the other groups.
18 What do you mean by that?

19 A. IE branded themselves and marketed
20 themselves as, you know, we wear slacks and
21 loafers and we go to colleges and talk to,
22 like, young folks and we -- we try to start
23 dialogs with them. Whereas other groups kind
24 of came across as this very, like, blatant,
25 like, national socialist, you know, swastika

00016:01 Samantha M. Froelich

02 tattoos. You know, just much more like
03 obvious and -- and gruff sounding. And I -- I
04 had no intention of being a Nazi.

6. PAGE 16:13 TO 16:25 (RUNNING 00:00:29.126)

13 Q. And when did you -- did you
14 ultimately join Identity Evropa?

15 A. I did, yes. That day I filled out

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16 an application.
17 Q. When was that?
18 A. Oh, man. I want to say it was,
19 like, maybe like Christmas Eve or something.
20 Like the week of Christmas 2016.
21 Q. How many members did Identity
22 Evropa have when you joined it in Christmas
23 of -- around Christmastime of 2016?
24 A. Probably about, like, maybe 250,
25 300 maybe.

7. PAGE 18:02 TO 19:10 (RUNNING 00:01:10.146)

02 Q. And you also mentioned an
03 interview that you did to become a member of
04 Identity Evropa?
05 A. Yes.
06 Q. Who interviewed you?
07 A. At the time he went as Reinhard
08 Wolff, but we now know him as Patrick Casey.
09 Q. And do you recall the sorts of
10 questions that you were asked in the
11 interview?
12 A. Yeah. What was my red-pill
13 process, what are my thoughts on an
14 ethnostate, you know, what are my thoughts on
15 the JQ. You know, and then -- and then -- you
16 know, those were Alt Right specific. And then
17 other things were, you know, kind of what do I
18 do for hobbies, do I have any drug or
19 substance issues, do I have a history of
20 mental health problems.
21 Q. You mentioned a number of terms in
22 that answer that I'd like to just quickly
23 follow up on and define.
24 A. Okay.
00019:01 Q. You said, "My red-pill process."
Samantha M. Froelich
02 A. Yes.
03 Q. Briefly, what does that refer to?
04 A. It's the process of which, like,
05 you kind of first hear about the Alt Right to
06 when you first believe your first thought that
07 they also believe in to when you're fully
08 radicalized. Like, just the process of being
09 a normal person into a member of the
10 Alt Right.

8. PAGE 19:15 TO 20:04 (RUNNING 00:00:27.130)

15 Q. And you mentioned an "ethnostate."
16 A. Yes.
17 Q. And that one of the questions that
18 you received were what were your views on an
19 ethnostate?
20 A. Yes.
21 Q. What is an ethnostate?
22 A. An ethnostate would be just a
23 piece of land where everyone is of, you know,
24 the same heritage or race. In the Alt Right
25 specifically, it would be a white ethnostate,
00020:01 Samantha M. Froelich
02 so it would be like a piece of land or a
03 country that only white people inhabit or, you
04 know, go to or live in.

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9. PAGE 20:09 TO 20:14 (RUNNING 00:00:18.437)

09 Q. And is there a particular answer
10 to that question that, as you understand it,
11 Identity Evropa is looking for?
12 A. Yeah, the ultimate goal of
13 Identity Evropa was to create or participate
14 in the creation of an ethnostate.

10. PAGE 20:19 TO 21:15 (RUNNING 00:00:57.350)

19 Q. You mentioned "JQ."
20 A. Yes.
21 Q. What is JQ?
22 A. The JQ is the Jewish Question.
23 Q. And what does that mean?
24 A. The Jewish Question is just kind
25 of a term that's used, but really what they're
00021:01 Samantha M. Froelich
02 asking is do you think Jewish people are
03 white. And if -- if so or if not, why? Yeah.
04 Q. And why, as you understand it, was
05 that an important question to discuss in the
06 interview process for becoming a member of
07 Identity Evropa?
08 A. Part of being in Identity Evropa
09 is to -- is to be in the mindset that Jewish
10 people are not white, that they are subverting
11 white culture, that they are -- that they have
12 a stronghold in media, banking, film, culture
13 in general, and they are promoting degeneracy
14 and they are promoting, I guess, the
15 extinction of white people.

11. PAGE 24:18 TO 24:23 (RUNNING 00:00:20.749)

18 Q. And do you understand why it's
19 referred to as The Battle of Berkeley?
20 A. Yes. I guess there was violent
21 confrontation and there was a video that
22 surfaced of Nathan Damigo punching a woman in
23 the face, and that was considered successful.

12. PAGE 21:23 TO 22:02 (RUNNING 00:00:07.205)

23 Q. Did you all, when you were a
24 member of Identity Evropa, refer to yourselves
25 as IE?
00022:01 Samantha M. Froelich
02 A. Yes.

13. PAGE 25:10 TO 25:14 (RUNNING 00:00:10.974)

10 Q. So was it your understanding -- so
11 just to be clear, you were reading
12 applications for people applying to be members
13 of IE after The Battle of Berkeley?
14 A. Yes.

14. PAGE 25:17 TO 28:10 (RUNNING 00:03:06.950)

17 Was it your understanding that the
18 specific incident of Nathan Damigo punching a
19 woman in the face led to an increase in
20 applications for IE?
21 A. Yes.
22 Q. And was that something that you
23 discussed within Identity Evropa at the time?
24 A. Yes.

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25 Q. And am I correct that The Battle
00026:01 Samantha M. Froelich
02 of Berkeley was considered to be successful in
03 part because Nathan Damigo punched a woman in
04 the face which led to an increase in
05 applications?
06 A. Yes.
07 Q. Who was the leader of Identity
08 Evropa when you were a member?
09 A. It started with Nathan Damigo and
10 then it was Eli Mosely until I left.
11 Q. And do you know when the
12 leadership changed from Mr. Damigo to
13 Mr. Mosely?
14 A. I want to say it was maybe a
15 couple days, maybe a week-ish after the Unite
16 the Right rally Nathan had stepped down and
17 Eli had taken over.
18 Q. And when you say "Eli Mosely," do
19 you also know him as Eli Kline?
20 A. Elliot Kline, yes.
21 Q. Or Elliot Kline?
22 A. Yeah.
23 Q. That's the same person?
24 A. Yes.
25 Q. Prior to Mr. Kline taking over as
00027:01 Samantha M. Froelich
02 the leader, what was his role within Identity
03 Evropa?
04 A. I think he would call himself an
05 activist. He was kind of a hype man for lack
06 of a better term. He would go into public
07 spaces, make a scene, and then try and promote
08 Identity Evropa. That was just -- I guess --
09 I guess you could say spokesperson, activist,
10 the -- one of the voices of Identity Evropa.
11 Q. So just to be clear, before he
12 officially became the leader, taking over for
13 Nathan Damigo, Mr. Kline had a position of
14 leadership within Identity Evropa?
15 A. Yes.
16 Q. By the way, did you ever come to
17 understand the significance of the name Eli
18 Mosely?
19 A. Yes.
20 Q. And what -- what does Eli Mosely
21 refer to?
22 A. I mean Eli is his first name
23 obviously, but Mosely comes from a British
24 fascist named Oswald Mosely. And he was a
25 British fascist and everything that comes with
00028:01 Samantha M. Froelich
02 that.
03 Q. When you say "everything that
04 comes with that," what do you mean by that?
05 A. The violence. The violent
06 rhetoric. The -- I'm pretty sure by the end
07 of his life people didn't listen to him
08 because his speeches were trash, but, you
09 know, he -- he followed the same violent
10 rhetoric that all these guys do.

15. PAGE 28:18 TO 29:03 (RUNNING 00:00:20.859)

18 Q. Did you ever come to have any sort
19 of official title or role within IE?
20 A. Yes.

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21 Q. And what role was that?
22 A. I was the women's coordinator and
23 sometime after that until I left, I became the
24 interview coordinator.
25 Q. Okay. So you had two separate
00029:01 Samantha M. Froelich
02 roles?
03 A. Yes.

16. PAGE 30:12 TO 31:07 (RUNNING 00:00:58.619)

12 Q. Generally speaking, how were women
13 perceived within IE?
14 A. Women were permitted to join.
15 They were allowed to have opinions, but if a
16 man didn't agree -- for instance, if a woman
17 asked me a question or asked me for advice and
18 I said, you know, this, or, you know, as a
19 representative of IE, I would say, "Maybe this
20 is a good, you know, plan of action," and they
21 didn't like what I said, they could go to a
22 man and whatever the male coordinator said
23 would override what my advice was.
24 Q. So were women allowed to make
25 decisions on behalf of Identity Evropa without
00031:01 Samantha M. Froelich
02 the input of a man?
03 A. Not really, no. Women were kind
04 of always attached to men. There was always a
05 caveat, there was always a cap to our
06 influence, to what we could know and to what
07 we could do.

17. PAGE 32:24 TO 35:12 (RUNNING 00:02:42.693)

24 Q. So one of the things you did is
25 conduct interviews?
00033:01 Samantha M. Froelich
02 A. Yes.
03 Q. How many interviews,
04 approximately, did you conduct as a member of
05 IE?
06 A. I would say at least -- at least
07 100, maybe -- maybe up to 200, but I -- I
08 really am not sure on that.
09 Q. And did you also review
10 applications as part of your role of --
11 A. Yes.
12 Q. -- interview coordinator?
13 A. Yes.
14 Q. Can -- can you estimate
15 approximately how many applications you
16 reviewed?
17 A. Hundreds.
18 Q. And were you involved in decisions
19 as to who gets admitted into IE?
20 A. Yes.
21 Q. And how long did you serve in your
22 role of interview coordinator?
23 A. I became an interviewer around the
24 same time I became women's coordinator. I
25 became interview coordinator probably later on
00034:01 Samantha M. Froelich
02 in the summer of 2017, so I would say maybe
03 three months.
04 Q. Okay. What was IE's stated
05 mission as you understood it?

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06 A. Their stated mission, I -- I don't
07 remember it verbatim. I don't remember if it
08 was even the official mission statement.
09 Something to the effect of being a fraternity
10 or community of men and women who are of
11 awakened European heritage that wanted to
12 continue their legacy and provide a safe space
13 for other white people to exist within their
14 world.

15 Q. And do you believe that the stated
16 mission, as you describe it, is, in fact, the
17 reality of what IE's ideology was?

18 A. I don't believe that it matched
19 up.

20 Q. And why do you say that?

21 A. I had had conversations with
22 leaders within IE that were saying that its
23 goal was also to be a political think tank, to
24 get young men and women while they were in
25 college and instill them with the ideology of

00035:01 Samantha M. Froelich
02 the Alt Right and have them build policy and
03 create this ethnostate and, you know, get the
04 ball moving on that. It wasn't just, you
05 know, a baking club for Irish people. It
06 wasn't just a hiking club for, you know,
07 Polish men and women. Like, this was -- there
08 was an action involved in it.

09 Q. And to be clear, is the action
10 you're talking about the creation of a white
11 ethnostate?

12 A. Yes.

18. PAGE 35:14 TO 38:03 (RUNNING 00:03:06.043)

14 While you were in a leadership
15 position within IE, did you hear any
16 discussion of optics?

17 A. Yes.

18 Q. And what was -- what were the
19 discussions that you were part of along those
20 lines?

21 A. I mean, optics were paramount to
22 IE getting their message and branding out.
23 Again, make sure that when you're interviewing
24 someone, make sure that the room they're in
25 looks clean, make sure that they're -- you

00036:01 Samantha M. Froelich
02 know, they look like they take care of
03 themselves. If you're out in public or in a
04 rally, you know, speak with eloquence. Don't
05 use racial slurs in public. Don't say any
06 Nazi rhetoric in public. Wear slacks and
07 loafers. Wear dresses. Look feminine. Don't
08 use unnatural hair colors. It was very
09 strict. They -- I -- they wanted to look
10 presentable. They wanted -- I mean, I
11 would -- I would say it was like being wolves
12 in sheep's clothing.

13 Q. And why do you say that?

14 And to be clear, why do you say IE
15 was "like being wolves in sheep's clothing"?

16 A. When I joined, it was really just
17 to get in touch with my heritage and to prove
18 to my boyfriend that we had common interests,
19 I guess. And when you go in and people in IE
20 are sending you links to servers called the

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21 Holohoax, and how, you know, Hitler didn't do
22 enough, I feel like that's more than just
23 being an awakened European. It just --
24 it's -- it's -- it's violence. It's chaos.
25 It's hate. It's not just wanting to, like,
00037:01 Samantha M. Froelich
02 learn how to knit.
03 Q. You used the word "Holohoax."
04 A. Yeah.
05 Q. What does Holohoax refer to?
06 A. Holohoax is what many people in
07 the Alt Right called the Holocaust because
08 they believe that either it didn't happen or
09 it didn't happen enough.
10 Q. And when you say, "It didn't
11 happen enough," what do you mean?
12 A. That not enough Jewish people were
13 killed.
14 Q. What was the organization -- now
15 moving beyond the optics, what did you come to
16 believe IE's views were with respect to Jewish
17 people?
18 A. I -- I mean, IE -- there was a
19 simultaneous, like -- the word's not
20 intimidating, but like they were almost
21 jealous of Jewish people for having a sense of
22 tribalism and for trying to protect
23 themselves, but they wanted to exterminate
24 Jewish people and, I mean, they were not
25 invited to the ethnostate.
00038:01 Samantha M. Froelich
02 Q. Jewish people?
03 A. Yeah, no, absolutely not.

19. PAGE 38:04 TO 38:11 (RUNNING 00:00:19.882)

04 Q. And just to clarify, when you say,
05 "They wanted to exterminate Jewish people,"
06 you mean IE wanted to exterminate Jewish
07 people?
08 A. I don't want to speak for everyone
09 in IE, but plenty of people in IE were
10 interested in the death and extinction of
11 Jewish people, yes.

20. PAGE 38:15 TO 38:25 (RUNNING 00:00:29.240)

15 Q. What was IE's views with respect
16 to black people as you understood it?
17 A. They were subhuman. There was
18 effectively a one-drop rule in terms of
19 membership in IE.
20 Q. When you say "one-drop rule," what
21 do you mean?
22 A. That if you had any percentage
23 of -- of DNA that was African American, of the
24 Caribbean, like any sort of black identifying
25 ethnicity, that you were not allowed in IE.

21. PAGE 39:24 TO 40:05 (RUNNING 00:00:15.995)

24 As you came to understand Identity
25 Evropa's interest in creating a white
00040:01 Samantha M. Froelich
02 ethnostate, did you come to understand that
03 creation of a white ethnostate would be an
04 inherently violent process?
05 A. Yes.

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22. PAGE 41:20 TO 43:02 (RUNNING 00:01:19.738)

20 Q. As you came to understand it, did
21 IE believe that white genocide was occurring
22 in America?
23 A. Yes.
24 Q. Notwithstanding the optics as you
25 described earlier, would you describe IE's
00042:01 Samantha M. Froelich
02 fundamental ideology as violent?
03 A. Yes.
04 Q. And why is that?
05 A. I mean, IE would claim to be just
06 pro-white, but to be pro-white, you are
07 anti-everything else. You're already born
08 into a system that benefits you, and they --
09 there's this narrative in the Alt Right that
10 you're a victim, that you're being beaten down
11 and -- and browbeaten for just existing and
12 all of these things, and the belief is that
13 white people need to fight back. The belief
14 is that white people need to take care of
15 themselves and be ready for this war that
16 everyone thinks is going to happen.
17 I mean, it's just a -- it's just
18 inherently violent. To think that people are
19 subhuman means that it wouldn't be murder if
20 you killed them because they're not even
21 human. That's violent.
22 Q. And those are views that you heard
23 expressed by members of IE?
24 A. Yes. I mean, all throughout the
25 Alt Right, the Alt Right as a whole believes
00043:01 Samantha M. Froelich
02 that.

23. PAGE 43:04 TO 44:13 (RUNNING 00:01:37.228)

04 In your time in the Alt Right, did
05 you become familiar with certain language or
06 lingo that is commonly used within the
07 Alt Right?
08 A. Yes.
09 Q. And how is it that you became
10 familiar with common language within the
11 Alt Right?
12 A. As I was consuming media, you
13 become familiar with the words that they would
14 use, and I would either ask people or you kind
15 of just watch enough videos to -- to learn
16 what these things mean.
17 Q. Have you heard the term "Turner
18 Diaries"?
19 A. Yes.
20 Q. And what are The Turner Diaries?
21 A. Turner Diaries is a book written
22 by James [sic] Pierce, I think. It's about
23 this guy who's trying to build an underground
24 army of white people that -- for something,
25 and the government doesn't believe him and
00044:01 Samantha M. Froelich
02 eventually it leads to the climax which is the
03 day of the rope which is where all cisgender,
04 heteronormative European -- European
05 non-Semitic heritage people drag anyone that
06 doesn't fit that very narrow description out
07 of their houses and hangs them on lampposts.

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08 I think it's also called White Utopia is what
09 it's referred to.
10 Q. And who did you hear discuss or
11 reference The Turner Diaries during your time
12 within IE?
13 A. A lot of people.

24. PAGE 46:11 TO 46:16 (RUNNING 00:00:11.618)

11 Q. And did you ever hear Eli Mosely
12 talk about The Turner Diaries?
13 A. Yeah.
14 Q. Did you ever hear Eli Mosely talk
15 about the day of the rope?
16 A. Yes.

25. PAGE 46:19 TO 47:03 (RUNNING 00:00:27.530)

19 Well, in what context did you hear
20 Mr. Mosely discuss the day of the rope?
21 A. I mean, I think in the beginning
22 of knowing him it was often just kind of a
23 reference or, you know, just, "We'll get you
24 on the day of the rope" for -- for me if I
25 acted out of turn. For people if we saw them
00047:01 Samantha M. Froelich
02 and he didn't like how they looked, it was
03 just a common thing that he would say.

26. PAGE 47:06 TO 47:09 (RUNNING 00:00:07.808)

06 Eli Mosely would say to you if you
07 acted out of turn, "We'll get you on the day
08 of the rope"?
09 A. Yes.

27. PAGE 49:03 TO 50:22 (RUNNING 00:01:50.194)

03 What are the "14 Words"?
04 A. The 14 words, I don't remember
05 them, but we must protect -- we must protect
06 white people and a future for white children
07 or something to that effect.
08 Q. And what's the significance or
09 what's the meaning of the 14 Words?
10 A. The 14 Words, whenever you see the
11 numbers 1488, that's the 14. 14 Words were
12 said by David Lane. He was in some far right
13 white supremacist group. I think he killed
14 like a radio D.J. or something; and he did it,
15 again, to try and stop the -- stop what he
16 thought was Jewish influence on white culture
17 and to save white people.
18 Q. Are the 14 Words something that
19 you heard discussed within IE?
20 A. Oh, yes.
21 Q. And in what context generally?
22 A. I mean, it was a -- it was a
23 salutation. It was a prayer. It was what
24 people said, "Just remember the 14 Words."
25 You know, "I'm going on a date with this girl."
00050:01 Samantha M. Froelich
02 Remember the 14 Words." "I, you know, I have
03 to go talk to my family" or do anything, the
04 14 Words, 1488 was -- that was all the time
05 said.
06 Q. Did you hear Eli Kline reference
07 the 14 Words?

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08 A. Yeah.
09 Q. And by "Eli Kline," I mean,
10 Elliot --
11 A. Elliot.
12 Q. -- Eli Mosely.
13 A. Yeah.
14 Q. What is the significance of the
15 number 88?
16 A. 88 is the eighth letter in the
17 alphabet. They also look like Hs. It stands
18 for Hail Hitler.
19 Q. And to state the obvious, by "Hail
20 Hitler," I take it that refers to Adolf
21 Hitler?
22 A. Yes.

28. PAGE 51:20 TO 52:03 (RUNNING 00:00:20.388)

20 Q. By "Sieg-Heiling," you -- what do
21 you mean Sieg-Heiling?
22 A. It would be Roman saluting, Nazi
23 saluting.
24 Q. And so is that another example of
25 optics versus reality with regard to Identity
00052:01 Samantha M. Froelich
02 Evropa's ideology?
03 A. Oh, yes, absolutely.

29. PAGE 53:13 TO 57:20 (RUNNING 00:04:45.483)

13 Q. Have you heard the term "right
14 wing death squads"?
15 A. Yes.
16 Q. What are right wing death squads?
17 A. The -- basically in -- in -- they
18 were kind of just, like, again, this loose
19 collective of people that just claimed to be
20 in right wing death squads, but they -- they
21 would act as -- or they would claim to act as
22 security or they were starting their own
23 group.
24 I was never -- I was never really
25 sure, honestly, of my time in there what
00054:01 Samantha M. Froelich
02 exactly a right wing death squad was. But, I
03 mean, they'd -- people would say that they
04 were in, and they were usually people that
05 worked out a lot or were in the military or
06 had some sort of interest in being security.
07 Q. And in what -- did you hear the --
08 the phrase "right wing death squad" discussed
09 within the Alt Right?
10 A. Yes.
11 Q. In what context?
12 A. Any time that there was an event
13 where security was needed or any time that
14 there was an event where something public was
15 happening, without fail, almost every single
16 time someone would say like, "Yeah, right wing
17 death squads are coming." They're either
18 keep -- keep the Alt Right safe or to stop
19 people from infiltrating or being problematic,
20 but that was kind of -- if you were acting as
21 someone in -- of service or if you were
22 willing to take action at a rally, you were --
23 you would consider yourself part of a right
24 wing death squad.

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25 Q. By "take action at a rally," what
00055:01 Samantha M. Froelich
02 do you mean?
03 A. Participate in a violent action.
04 Q. And did you ever hear Eli Mosely
05 talk about right wing death squads?
06 A. Yeah, I mean, in passing he had
07 said -- or in generally, I guess, he would
08 talk and say, "You know, we're having this
09 group at the rally, that group at the rally,
10 all the white -- all the right wing death
11 squads will be there."
12 Q. Did you ever hear Mr. Mosely
13 discuss right wing death squads in the context
14 of the Unite the Right rally?
15 A. Yes, that's actually what I was
16 just referencing, yeah.
17 Q. So you heard Mr. Mosely discuss
18 right -- having right wing death squads at the
19 Unite the Right?
20 A. Yes.
21 Q. Did you hear anybody in addition
22 to Mr. Mosely discuss having right wing death
23 squads at Unite the Right?
24 A. I don't recall. I don't think so.
25 Q. Have you --
00056:01 Samantha M. Froelich
02 A. There would be -- there would be
03 people that said they were going to the rally
04 and that they were in a right wing death
05 squad, but I am not -- I -- that, I don't
06 recall.
07 Q. Have you heard the phrase
08 "RaHoWa"? And that's R-A-H-O-W-A.
09 A. Yes.
10 Q. And what does RaHoWa mean?
11 A. RaHoWa stands for racial holy war.
12 Q. And what does that mean?
13 A. It was this idea that there would
14 be a physical, violent confrontation between
15 white people and every other race, and I guess
16 there would be like a -- another civil war
17 coming and there would be fight until all but
18 one race is dead.
19 Q. And did you hear the term "RaHoWa"
20 or racial holy war discussed by IE members
21 while you were a member of IE?
22 A. Yes.
23 Q. And in what context do you recall
24 the term "RaHoWa" being discussed?
25 A. There were Discord servers where
00057:01 Samantha M. Froelich
02 people were encouraged to exercise or to eat
03 healthy and it was always in preparation for
04 RaHoWa. You know, women should learn how
05 to -- how to homestead in preparation for
06 RaHoWa.
07 There were -- it was almost,
08 again, as part of the ethnostatum, I'm -- it
09 just seemed to me like RaHoWa was the way to
10 get there.
11 Q. Do you recall Mr. Mosely using the
12 term "RaHoWa"?
13 A. Yes.
14 Q. And in what context do you recall
15 Mr. Mosely using the term "RaHoWa"?

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16 A. Again, his language was generally
17 violent. RaHoWa was something that was
18 discussed pretty regularly.
19 Q. By Mr. Mosely?
20 A. Yes.

30. PAGE 58:15 TO 60:14 (RUNNING 00:02:06.997)

15 Q. Ms. Froelich, have you heard the
16 phrase "GTK"?
17 A. Yes.
18 Q. What does GTK stand for?
19 A. GTK stands for gas the kikes.
20 Q. And what does gas the kikes means?
21 A. I mean, emulating what Nazis did
22 in World War II, to take Jewish people, put
23 them in a room and kill them with gas.
24 Q. And to be clear, does the word
25 "kikes" refer to Jewish people?
00059:01 Samantha M. Froelich
02 A. Yes.
03 Q. And is that a derogatory term for
04 Jewish people as you understand it?
05 A. Yes.
06 Q. And did you hear that phrase used
07 by members of the Alt Right when you were a
08 member of Identity Evropa?
09 A. Yes. This was used
10 interchangeably with the term "putting someone
11 in an oven" or "you get the oven." That would
12 be, I guess, the modern day equivalent, in
13 their mind, of gassing Jewish people in a
14 chamber.
15 Q. Did you say "putting them in an
16 oven"?
17 A. Yes.
18 Q. And what did that refer to?
19 A. Taking a Jewish person and
20 throwing them in an oven or like a crematorium
21 almost until they were nothing but ash.
22 Q. Did you ever hear Mr. Mosely use
23 the term "gas the kikes"?
24 A. Yes.
00060:01 Q. Did you ever hear Mr. Mosely use
Samantha M. Froelich
02 the term "putting someone in an oven"?
03 A. Yes.
04 Q. And in what context did you hear
05 Mr. Mosely say that?
06 A. We once went to my hometown and he
07 was upset that he couldn't oven all the Jews.
08 He, again, much like, you know, his interest
09 in -- in my death on the day of the rope, he
10 definitely had an interest in ovening all Jews
11 whenever he saw one.
12 Q. And by "ovening all Jews," you
13 mean murdering Jews?
14 A. Yes.

31. PAGE 61:05 TO 62:23 (RUNNING 00:01:54.248)

05 Have you heard the phrase "the
06 Final Solution"?
07 A. Yes.
08 Q. And what is that?
09 A. The Final Solution is in reference
10 to Hitler's Final Solution, which is to

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11 murder, exterminate all Jewish people.
12 Q. And did you hear that concept
13 discussed within Identity Evropa?
14 A. Yes.
15 Q. Was that concept discussed
16 favorably or unfavorably?
17 A. Favorably.
18 Q. Did you ever hear Mr. Mosely talk
19 about the Final Solution?
20 A. Yes.
21 Q. And when Mr. Mosely would discuss
22 the Final Solution, did he believe it to be a
23 favorable or unfavorable thing?
24 A. Oh, he would talk about it with
25 glee. He was very excited at the prospect of
00062:01 Samantha M. Froelich
02 killing Jewish people.
03 Q. Have you heard the phrase "hail
04 victory"?
05 A. Yes.
06 Q. And what does "hail victory" mean?
07 A. I believe it's a reference to -- I
08 believe the direct translation is Sieg Heil in
09 German.
10 Q. And what is that?
11 A. That was the salute that Hitler
12 and his soldiers and police and whomever, his
13 constituents, used to reference him.
14 Q. Did you hear either Sieg Heil or
15 hail victory discussed within the Alt Right?
16 A. Yes. At every social event I went
17 to, that was said.
18 Q. Do you recall Mr. Mosely using
19 that phrase?
20 A. Yes.
21 Q. Do you recall Richard Spencer
22 using that phrase?
23 A. Yes.

32. PAGE 62:24 TO 63:16 (RUNNING 00:00:41.363)

24 Q. Was there a gesture associated
25 with the phrase "hail victory" or "Sieg Heil"?
00063:01 Samantha M. Froelich
02 A. Yes.
03 Q. And what was that gesture?
04 A. The Roman or Nazi salute.
05 Q. Okay. And was that gesture used
06 frequently by Identity Evropa members while --
07 as you were a member of Identity Evropa?
08 A. Yes. In fact, in IE there was a
09 joke where you would ask if you've seen my
10 friend Kyle. "Did you see Kyle," Sieg Heil.
11 I hope you understand the wordplay here. And
12 then you would do the Sieg Heil and say, "Oh,
13 he's right over there," and point your finger.
14 "He's about this tall," and it was -- that was
15 the joke, is that you're Sieg-Heiling in plain
16 day.

33. PAGE 64:02 TO 64:11 (RUNNING 00:00:32.029)

02 Q. Did you ever hear Mr. Mosely
03 discuss the JQ?
04 A. Yes.
05 Q. And what did Mr. Mosely say about
06 the JQ?

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07 A. I mean, Mr. Mosely's opinion on
08 the JQ was that Jewish people were like
09 cockroaches. They were disgusting. They were
10 a curse on this earth, that they were demons.
11 He had very strong opinions about the JQ.

34. PAGE 64:14 TO 64:17 (RUNNING 00:00:07.406)

14 Q. Did you ever hear Dylann Roof
15 discussed by IE members while you were a
16 member of IE?
17 A. Yes.

35. PAGE 64:23 TO 65:03 (RUNNING 00:00:14.948)

23 Can you first tell us who is
24 Dylann Roof?
25 A. Dylann Roof is a mass murderer who
00065:01 Samantha M. Froelich
02 in 2015 murdered nine people I believe at a
03 church in Charleston, South Carolina.

36. PAGE 65:06 TO 67:20 (RUNNING 00:03:06.706)

06 What did you hear people within
07 Identity Evropa say about Dylann Roof when you
08 were a member of IE?
09 A. He was more often referenced as
10 St. Roof. They said that he would get a
11 statute in the ethnostate. He was revered as,
12 I guess, a martyr for the cause of the
13 Alt Right despite him never -- like, he was
14 never in an Alt Right group, but he was
15 effectively worshipped by members of the
16 Alt Right.
17 Q. Did you hear Eli Mosely discuss
18 Dylann Roof?
19 A. Yes.
20 Q. And what did Eli Mosely say to you
21 about Dylann Roof?
22 A. I mean, again, that he was a
23 martyr for the cause, that you can't pick your
24 martyrs. He would have picked someone, I
25 guess, older, but ultimately Dylann Roof did
00066:01 Samantha M. Froelich
02 what Eli wishes he could have done. I think
03 at one point in time he made the joke that
04 after the current undercut haircut that most
05 men in the Alt Right sport, that they would
06 make it a tactical bowl cut to model Dylann
07 Roof's preferred esthetic.
08 Q. When you describe the haircut, you
09 said that Mr. Mosely made a joke about that?
10 A. Yes.
11 Q. Did you understand Mr. Mosely to
12 be joking about his reference for Dylann Roof?
13 A. No.
14 Q. And why did you perceive that not
15 to be a joke?
16 A. I mean, based on everything about
17 his personality, the fact that he is one of
18 the people who said that -- that Dylann Roof
19 would get a statute in the ethnostate, there
20 was never anything joking about it.
21 Q. And when you said, "He is one of
22 the people who said that," you mean Eli Mosely
23 is one of the people who said that Dylann Roof
24 would get a statute in the ethnostate?

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25 A. Yes.
00067:01 Samantha M. Froelich
02 Q. Have you heard the word
03 "triggering"?
04 A. Yes.
05 Q. And what does triggering mean?
06 A. Triggering is to say or do
07 something in front of or to someone that would
08 elicit, like, a negative memory or a negative
09 intense reaction from someone.
10 Q. Would it be fair to say it -- to
11 trigger someone is to try to provoke a
12 response from someone?
13 A. Yes.
14 Q. And could it be a physical
15 response in addition to an emotional response?
16 A. Yeah.
17 Q. And did you hear triggering as a
18 concept that was discussed within Identity
19 Evropa?
20 A. Yeah.

37. PAGE 68:20 TO 69:07 (RUNNING 00:00:32.768)

20 Q. Have you heard the term
21 "Communist"?
22 A. Yes.
23 Q. And within the Alt Right, what
24 does the word "Communist" refer to?
25 A. As a broad stroke, the enemy,
00069:01 Samantha M. Froelich
02 interchangeable with Jewish, Antifa. They
03 also used -- they used a lot of other impolite
04 racial terms, but it was all the same. If you
05 weren't Alt Right, you were a commie, you were
06 a Jew, you were a cock, you were this, you
07 were that.

38. PAGE 69:19 TO 70:11 (RUNNING 00:00:43.217)

19 Q. Do you agree with me that the
20 terms "Communist," "counter-protester," and
21 "Antifa" were used interchangeably to refer to
22 counter-protesters at Unite the Right?
23 A. Yes.
24 Q. Were counter-protesters also
25 referred to as race traitors?
00070:01 Samantha M. Froelich
02 A. Oh, yes.
03 Q. And by that I mean
04 counter-protesters that attended Unite the
05 Right, were they also referred to as race
06 traitors?
07 A. Yes. Specifically, I mean, that
08 was mainly towards women. I mean, there was a
09 whole vocabulary for anyone that wasn't in the
10 Alt Right and, yes, race traitors is
11 absolutely in there.

39. PAGE 70:12 TO 72:05 (RUNNING 00:01:42.106)

12 Q. Have you ever seen the "okay" hand
13 sign used?
14 A. Yes.
15 Q. And just for the record, by that I
16 mean the sign where you touch your forefinger
17 to your thumb and have your other three
18 fingers extended.

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19 A. Like this (indicating)?
20 Q. Correct.
21 A. Yes.
22 Q. What did that signify within the
23 Alt Right?
24 A. The okay sign was a dog whistle
25 for a while that you were one of them. If
00071:01 Samantha M. Froelich
02 you're looking for someone in a crowd or if
03 you're meeting someone, you would start to say
04 words and see if they caught on. And if this
05 person wasn't, you would give them the okay
06 sign. And if they returned it, that was
07 typically an indication that they too were of
08 the Alt Right mindset.
09 Q. When you say "dog whistle," what
10 does that mean?
11 A. A dog whistle is a term used -- a
12 dog whistle -- so, for instance, another word
13 in the Alt Right that they used for Jewish
14 people is "globalist." And they'll say
15 globalist during public interviews and they'll
16 say, like, "The globalist is the enemy. We
17 need to think locally." And the idea of that
18 is to create an isolationist mindset.
19 Globalist means Jewish person. Communist
20 means Jewish person. These are dog whistles
21 that you would use in everyday conversation to
22 see if someone was on the same wavelength as
23 you mentally.
24 Q. Would it be fair to say that by
25 dog whistle you mean something that folks
00072:01 Samantha M. Froelich
02 within the Alt Right understood to mean one
03 thing, while the general public might
04 understand it to mean something else?
05 A. Yes.

40. PAGE 73:11 TO 74:02 (RUNNING 00:00:38.451)

11 Q. Have you heard the term "ZOG,"
12 Z-O-G?
13 A. Yes.
14 Q. What is ZOG?
15 A. I knew it means like -- zionist,
16 that's another -- well, it's not really a dog
17 whistle. I guess that's pretty out there.
18 But Zionist Organized Group I think is what it
19 means, but it's -- it also means -- like,
20 if -- they would always say you're fighting a
21 war because of ZOG. ZOG stands for Jewish
22 propaganda in that, you know, you're fighting
23 a war because of Jewish people.
24 MR. BLOCH: Ms. Froelich, I'd like
25 to show you what is being marked
00074:01 Samantha M. Froelich
02 Plaintiffs' Exhibit 1.

41. PAGE 74:09 TO 75:17 (RUNNING 00:01:42.217)

09 Q. Do you recognize that?
10 A. Yes.
11 Q. And what is that?
12 A. It's a Daily Stormer Style Guide.
13 Q. And how is it that you recognize
14 that?
15 A. I have seen it before.

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16 Q. And where did you see that before?
17 A. In my apartment. Eli Mosely had
18 shown this to me. He said he -- he would
19 ghostwrite for a lot of publications, and this
20 was typically the style guide that he used.
21 Q. And when you say Eli Mosely showed
22 you that in your apartment, approximately when
23 did he show you that?
24 A. The summer of 2017.
25 Q. And what was that document used
00075:01 Samantha M. Froelich
02 for as you understand it?
03 A. It was if you were publicizing --
04 if you were going to write a piece and publish
05 it, this is typically the tone and this is
06 typically what you would use to, I mean, guide
07 you in terms of writing it.
08 Q. And to be clear, when you say if
09 you're "going to write a piece and publish
10 it," do you mean a piece that focused on white
11 nationalist advocacy?
12 A. Yes.
13 Q. And it was your understanding that
14 Plaintiffs' 1, the Style Guide, was the tone
15 with which one should use to advocate for
16 white nationalist causes?
17 A. I'm sorry. Can you repeat that?

42. PAGE 75:18 TO 79:08 (RUNNING 00:03:45.772)

18 Q. Okay. Well, can you turn to
19 Page 9. I know they're not numbered, but I
20 believe it's the ninth page and it's the page
21 that begins at the top -- there's a paragraph
22 at the top and then shortly beneath that it
23 says, "Lulz," L-U-L-Z.
24 A. Yes.
25 Q. Have you seen that before?
00076:01 Samantha M. Froelich
02 A. Yes.
03 Q. And could you just read that into
04 the record, the portion that says, "Lulz"?
05 A. [As read]: "The tone of the site
06 should be light.
07 "Most people are not comfortable
08 with material that comes across as vitriolic,
09 raging, non-ironic hatred.
10 "The unindoctrinated should not be
11 able" --
12 (Reporter clarification.)
13 A. Oh, sorry.
14 "The unindoctrinated should not be
15 able to tell if we are joking or not. There
16 should also be a conscious awareness of
17 mocking stereotypes of hateful racists. I
18 usually think of this as self-deprecating
19 humor - I am a racist making fun of
20 stereotypes of racists, because I don't take
21 myself super-seriously.
22 "The is obviously a ploy and I
23 actually do want to gas kikes. But that's
24 neither here nor there.
25 "Serious articles are fine, and
00077:01 Samantha M. Froelich
02 can be written and published with absolute
03 seriousness. However, articles which take a
04 serious tone should not include racial slurs

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05 or even rude language about other races."

06 Q. And is that concept that is
07 described under "Lulz," L-U-L-Z, something
08 that you had heard before during your time in
09 Identity Evropa?

10 A. These general ideas, yes.

11 Q. And can you explain what those
12 general ideas are talking about?

13 A. I mean, you know, especially
14 during this time there was a lot of, like,
15 meme culture and a lot of people that were
16 trying to understand what the Alt Right was.
17 And so a lot of -- if you were getting a
18 question about the Alt Right, you were often
19 told, like, "They're just strokes. They're
20 just jokes. You know, we don't really mean
21 these things." But as someone were to engage
22 with the Alt Right more or become radicalized
23 themselves, you start to realize that they
24 aren't jokes, it's -- it's a cover. It's --
25 it's how you get away with saying what you

00078:01 Samantha M. Froelich

02 actually think is by using a light tone when
03 you say it.

04 Q. So would say this concept of
05 speaking lightheartedly or jokingly was a
06 tactic within the Alt Right?

07 A. Yes.

08 Q. And can you explain the role of
09 humor and jokes in the context of advocacy
10 within the Alt Right?

11 A. Yeah. When -- when you first join
12 the Alt Right, you see a lot of, you know,
13 memes and a lot of edgy humor. You're kind of
14 told to ignore it, you know, that those are
15 just the extremists, those are just the really
16 crazy ones. And so you do your best to do
17 that. And before you know it, you're
18 scrolling past these jokes as if they're
19 nothing. You become completely immune and
20 desensitized to it.

21 And then, like, a little bit
22 farther down in your radicalization you start
23 to realize, like, "Oh, I don't even think of
24 these as jokes anymore. These are just things
25 that I think." Like, it's -- it's beyond

00079:01 Samantha M. Froelich

02 being desensitized. You now are buying into
03 what these people are saying.

04 They'll say that it's just edgy
05 humor, but it's really just a way to push the
06 envelope and say as heinous of things or as
07 extreme ideas as they can and get away with
08 it.

43. PAGE 79:20 TO 81:02 (RUNNING 00:01:23.326)

20 Why is it that extreme concepts or
21 ideology were intentionally discussed in the
22 form of jokes?

23 A. It was a way to make it palatable
24 for the people who already have an edgier,
25 gallows humor; but also it was a way that if

00080:01 Samantha M. Froelich

02 someone were to call you out on it and say,
03 "Hey, that's -- that's really disgusting
04 ideology," you can say, "It's just a joke. We

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05 don't mean it," even though you did.
06 Q. And so was it actually just a joke
07 or was it for the purpose of plausible
08 deniability?
09 A. Plausible deniability. It's a
10 cover. It's -- yeah, absolutely.
11 Q. Did you discuss this concept of
12 using humor intentionally for plausible
13 deniability with anybody within the Alt Right?
14 A. Yes.
15 Q. Who?
16 A. Many people. Eli. When we
17 discussed this piece itself, I read that -- or
18 we were talking about something. He had me
19 read some piece that he made, and he said
20 something awful, and I was like, "You're, you
21 know, like" -- or he -- there was like some
22 sentence right at the end, I can't remember
23 what it was, and I was, like, "You're joking
24 right?" And he was, like, That's the point.
25 The point is to not know if it's a joke or
00081:01 Samantha M. Froelich
02 not.

44. PAGE 82:08 TO 83:14 (RUNNING 00:01:34.132)

08 Q. Did you have a Discord account?
09 A. I did.
10 Q. And did you see what was posted on
11 Discord?
12 A. Yes.
13 Q. And was this tactic that we're
14 discussing in Plaintiffs' Exhibit 1 something
15 that you saw discussed on Discord?
16 A. Yes. This was -- yes.
17 Q. When were you on Discord?
18 A. I was on Discord throughout 2017.
19 Q. And how did you become aware of
20 Discord?
21 A. During my interview for IE, for
22 Identity Evropa. Sorry.
23 Q. And who told you about it?
24 A. Reinhard Wolff.
25 Q. And why did you join Discord?
00083:01 Samantha M. Froelich
02 A. I joined Discord to become a
03 member of Identity Evropa. I was to create an
04 account, and that was where the majority of
05 membership interacted, was through these
06 Discord chat servers.
07 Q. Did you have a screen name?
08 A. I did.
09 Q. What was your screen name?
10 A. Norah Fox.
11 Q. Can you spell that?
12 A. N-O-R-A-H, F-O-X.
13 Q. Is that two words?
14 A. Yes.

45. PAGE 83:20 TO 84:08 (RUNNING 00:00:27.429)

20 Q. What -- how did you come up with
21 the name Norah Fox?
22 A. Eli Mosely chose it for me.
23 Q. And what does -- what does it
24 mean?
25 A. Norah Fox, I believe her name was

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00084:01 Samantha M. Froelich
02 commonly Norah Dacre Fox or Norah Fox Dacre.
03 She was actually -- they called her a fascist
04 feminist. She was a follower of Oswald
05 Mosely's. She believed that women should
06 still have the right to vote because they are
07 inherently more conservative and even more
08 extreme in their ideology.

46. PAGE 84:10 TO 85:11 (RUNNING 00:01:18.578)

10 Can you explain the role that
11 Discord played in organizing events and
12 rallies?
13 A. I would say that Discord made it
14 possible. You were able to have a large
15 amount of people in this chat server giving
16 their ideas and planning things out, and it
17 was also, like, a log of -- of all these
18 conversations that were happening.
19 Q. Did you communicate with Jason
20 Kessler on Discord?
21 A. Yes.
22 Q. Did you communicate with Eli
23 Mosely on Discord?
24 A. Yes.
25 Q. I'd like to talk about -- a little
00085:01 Samantha M. Froelich
02 bit more about Mr. Kline. And, again, when I
03 say "Mr. Kline," I also mean Mr. Mosely.
04 A. Okay.
05 Q. How did you refer to him when you
06 knew him?
07 A. Eli or Eli Mosely.
08 Q. And when did you first meet Eli?
09 A. I met Eli Mosely the weekend of
10 Charlottesville 1.0 in person. What was that?
11 May 12th maybe.

47. PAGE 85:21 TO 86:21 (RUNNING 00:00:59.960)

21 Q. Okay. And did there come a time
22 when you and Eli became more than friends?
23 A. Yes.
24 Q. And when was that?
25 A. Throughout 2017.
00086:01 Samantha M. Froelich
02 Q. And what was the nature of your
03 relationship with Mr. Kline during that time?
04 A. It became -- it became romantic.
05 Q. Did you ever live together with
06 Mr. Kline?
07 A. Yes.
08 Q. And where is it that you and
09 Mr. Kline lived together?
10 A. We lived together in Greenville,
11 South Carolina. Then we moved to Leesburg,
12 Virginia.
13 Q. And when did he -- well, did he
14 move in with you?
15 A. Yes.
16 Q. So it was your apartment in
17 Greenville, South Carolina?
18 A. Yes.
19 Q. And when did he move in with you?
20 A. I believe it was the first or
21 second week of June.

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48. PAGE 87:13 TO 87:20 (RUNNING 00:00:20.709)

13 Q. And when did you stop living
14 together?
15 A. I believe Thanksgiving weekend
16 2017.
17 Q. So would it be fair to say that
18 you lived with Mr. Kline from early June 2017
19 until Thanksgiving weekend 2017?
20 A. Yes.

49. PAGE 92:02 TO 94:15 (RUNNING 00:02:55.589)

02 Q. We've spoken about this previously
03 a couple times, but to be clear for the
04 record, did Mr. Kline express to you his views
05 about Jewish people?
06 A. Yes.
07 Q. And what did he say?
08 A. I mean, he said he was an unironic
09 exterminationist. In fact, he would -- he
10 talked about the fact that he worked like --
11 he said he worked HR for an -- a terminator
12 [sic] company and that, like, if he could --
13 he wishes he was killing Jews instead of
14 cockroaches, that he was excited to kill
15 Jewish people, that he would gas the kikes
16 forever. That it was -- I don't know. He
17 said a lot of things.
18 Q. I believe you said he worked for a
19 terminator company.
20 A. Yes.
21 Q. Did you mean --
22 A. Exterminator.
23 Q. I'm sorry?
24 A. Exterminator.
25 Q. Okay.
00093:01 Samantha M. Froelich
02 A. Pest control.
03 Q. And how often would Mr. Kline
04 express those sorts of views to you?
05 A. Every day.
06 Q. And when Mr. Kline expressed the
07 views to you about Jewish people, what was
08 your impression of his demeanor?
09 A. I mean, I guess it was a mixture
10 of, like, pride and excitement. Like, he
11 truly believes that Jewish people are scum and
12 he is very excited at the idea of -- of
13 exterminating them, of killing them.
14 Q. You used the phrase "unironic
15 exterminationist."
16 A. Yeah.
17 Q. Was that your phrase or
18 Mr. Kline's phrase?
19 A. Mr. Kline's.
20 Q. Did you ever hear Mr. Kline use
21 the phrase "gas the kikes"?
22 A. Yes.
23 Q. Did he ever use the phrase
24 "ovening people"?
25 A. Yes.
00094:01 Samantha M. Froelich
02 Q. And can you give us an example of
03 what Mr. Kline would say when he used the
04 phrase "ovening people"?
05 A. I mean, he -- so he was a leader

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06 within IE, and if there was an activist or
07 someone that was asking for his permission on
08 something, he would oven them.
09 We went back to my hometown to
10 visit people, and it turns out there were a
11 lot of Jewish people there. He wanted to oven
12 them. I lived in an area where there were
13 Jewish people around and he wanted to oven
14 them. It was -- it's -- it was -- he said it
15 all the time.

50. PAGE 94:16 TO 95:15 (RUNNING 00:01:10.687)

16 MR. BLOCH: Ms. Froelich, I'm
17 showing you what's been marked for
18 identification as Plaintiffs' Exhibit 4.
19 (Exhibit 4, Discord chat, is marked
20 for identification.)
21 THE WITNESS: Sorry.
22 BY MR. BLOCH:
23 Q. Do you see that?
24 A. Yeah.
25 Q. Is that a Discord chat?
00095:01 Samantha M. Froelich
02 A. Yes.
03 Q. And is that also a post in the
04 server called NiggKike Bar Mitzvah?
05 A. Yes.
06 Q. In the hashtag general channel?
07 A. Yes.
08 Q. And there is -- it begins with a
09 post from Eli Mosely 5269 on May 29th, 2017,
10 and it says, "be Norah, take Eli to hometown,
11 tell him he can't troll or reveal power level,
12 doesn't tell him that the entire town is full
13 of kikes. Judenjagers head explodes."
14 Did I read that correctly?
15 A. Yes.

51. PAGE 97:18 TO 98:02 (RUNNING 00:00:24.649)

18 Q. And Mr. Mosely uses the word
19 "Judenjager." And I'll spell that for the
20 record. J-U-D-E-N-J-A-G-E-R-S.
21 Do you know what Judenjager means?
22 A. Yes. Jewish hunter.
23 Q. Jew hunter?
24 A. (No reply.)
25 Q. Is that a "yes"?
00098:01 Samantha M. Froelich
02 A. I believe so, yes.

52. PAGE 98:04 TO 98:17 (RUNNING 00:00:33.060)

04 Did you hear Mr. Mosely use the
05 phrase "Judenjager"?
06 A. Yes.
07 Q. In what -- in what context did
08 Mr. Mosely use the phrase "Judenjager"?
09 A. He referred to himself as the
10 Judenjager.
11 Q. He said that to you?
12 A. Yes, he said that to many people.
13 Q. So you heard Mr. Kline refer to
14 himself as Jew Hunter --
15 A. Yes.
16 Q. -- in German?
17 A. Yes.

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53. PAGE 99:23 TO 101:10 (RUNNING 00:01:45.584)

23 Q. Did Mr. Kline ever express to you
24 his views about black people?
25 A. Yes.
00100:01 Samantha M. Froelich
02 Q. And what did Mr. Kline say to you
03 about black people?
04 A. There's a term that the Alt Right
05 uses for black people. They're called dindus.
06 And the idea of it is making fun of the idea
07 of a black person, because if a white cop
08 shoots a black child, they would say that the
09 mother usually gets on TV and says that they
10 didn't do nothing, so black people were often
11 referred to as dindus.
12 He believes that dindus are
13 worthless. He believes that black people are
14 worthless. I apologize. I was so used to
15 saying that. I'm really embarrassed by that.
16 He believed -- he would not refer to them as
17 people. They were second-class citizens,
18 subhuman, not deserving of anything. Again,
19 hated them only slightly less than Jewish
20 people.
21 Q. Did you ever hear Mr. Kline
22 discuss violence towards African Americans?
23 A. Yes, but I don't think he
24 considered it violence 'cause he didn't
25 consider them human.
00101:01 Samantha M. Froelich
02 Q. And can you give us some examples
03 of what Mr. Kline would say when he would
04 speak about violence towards African
05 Americans?
06 A. He would show me pictures of
07 lynchings and said that they were just a bunch
08 of dindus hanging with their friends. He
09 would -- he would just say awful things, but I
10 think that is a pretty -- explains itself.

54. PAGE 101:11 TO 104:04 (RUNNING 00:03:18.133)

11 Q. Do you recall anybody else being
12 present when Mr. Kline would express to you
13 his views about violence toward Jewish people?
14 A. I mean, he would talk about it at
15 parties. He would talk about it with people,
16 yes.
17 Q. Did you ever see Mr. Kline and
18 Mr. Spencer together?
19 A. Yes.
20 Q. And by Mr. Spencer, I mean Richard
21 Spencer.
22 A. Yes.
23 Q. Did you ever see Mr. Kline speak
24 about violence towards Jewish people while
25 Mr. Spencer was present?
00102:01 Samantha M. Froelich
02 A. Yes.
03 Q. And where is it that you observed
04 that?
05 A. Usually at -- at Richard's
06 apartment.
07 Q. Did you ever observe Mr. Kline
08 speak about his views about violence towards
09 black people while Mr. Spencer was present?

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10 A. Yes.
11 Q. And where is it that you observed
12 that?
13 A. Richard's apartment.
14 Q. Did you ever hear Mr. Kline speak
15 about an ethnostate?
16 A. Yes.
17 Q. What did Mr. Kline say to you
18 about an ethnostate?
19 A. That he would be President or czar
20 of the ethnostate; that, you know, you know,
21 whatever he said went; that he would have all
22 kinds of programs put into place that --
23 that I would be the first member of his
24 breeding camp.
00103:01 Q. Did Mr. Kline ever express to you
Samantha M. Froelich
02 how he believed an ethnostate would be
03 achieved?
04 A. Through violence.
05 Q. Did you ever hear Mr. Kline
06 discuss the concept of RaHoWa?
07 A. Yes.
08 Q. And what did you hear Mr. Kline
09 say about RaHoWa?
10 A. I mean, oftentimes he would tell
11 me that he needed to change his diet and start
12 exercising to prepare for it. But, I mean,
13 generally RaHoWa in his mind was bound to
14 happen. There was a time where a member of
15 Antifa, this -- and Antifa is an actis -- an
16 antifascist organization. They posted
17 something saying November 4th, 2017, I don't
18 know, maybe like fascist washout or something.
19 Eli was convinced that that too, because it
20 didn't happen at Unite the Right, would be the
21 start of RaHoWa.
22 He told us all that we needed to
23 have guns in our apartments, to lock every
24 door, to not leave, call out of work, do all
25 of this stuff. And he left and went and hung
00104:01 Samantha M. Froelich
02 out with maybe Richard Spencer. Maybe he went
03 to his parents' house. He was convinced that
04 RaHoWa was bound to start sometime very soon.

55. PAGE 111:18 TO 112:20 (RUNNING 00:01:28.862)

18 Q. Ms. Froelich, are you familiar
19 with what is referred to as Charlottesville
20 1.0?
21 A. Yes.
22 Q. What is Charlottesville 1.0?
23 A. Charlottesville 1.0 was a rally
24 planned by a few people in Identity Evropa.
25 It was meant to protest the removal of the
00112:01 Samantha M. Froelich
02 Robert E. Lee statute in Charlottesville.
03 Q. And did you have any involvement
04 in planning Charlottesville 1.0?
05 A. I got an Airbnb for myself and a
06 few people that were coming with me to the
07 rally; and then I offered a place to stay if
08 anyone needed it, but that would be about the
09 long and short.
10 Q. Okay. So you -- and you attended
11 it; is that correct?

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12 A. Yeah, I participated in the rally.
13 Q. And where was Charlottesville 1.0?
14 A. In Charlottesville.
15 Q. Who else did -- well, did you go
16 with anybody to the rally?
17 A. Yes.
18 Q. And who did you go with?
19 A. I went with several people from
20 the Carolinas area.

56. PAGE 113:10 TO 114:19 (RUNNING 00:01:40.582)

10 Q. Did Eli Kline go to
11 Charlottesville 1.0?
12 A. He did.
13 Q. Did Richard Spencer go to
14 Charlottesville 1.0?
15 A. Yes.
16 Q. And can you describe what
17 happened -- well, withdrawn.
18 When did you arrive in
19 Charlottesville, Virginia for the
20 Charlottesville 1.0 rally?
21 A. I believe we arrived Friday night.
22 Q. And would that be May 12th?
23 A. If that's what that Friday night
24 is, yeah.
00114:01 Q. And was there a march of sorts at
Samantha M. Froelich
02 Charlottesville 1.0?
03 A. Yes.
04 Q. And can you describe the march?
05 A. The march took place after the
06 daytime rally.
07 Q. Well --
08 A. I think -- or maybe it was --
09 yeah, the march took place at night and we got
10 there Friday night and practiced formations.
11 Just like, you know, they would make a couple,
12 like, military calls, we would form
13 appropriately. They'd let us all know -- we
14 kind of figured out who was going to stand
15 where.
16 The next day we had the rally.
17 Then there was the banquet. And then there
18 was the -- the -- the march through the city,
19 but I'm not sure what more questions.

57. PAGE 115:12 TO 115:18 (RUNNING 00:00:20.269)

12 Q. And the march, when you refer to
13 the march, what are you referring to?
14 A. At nighttime men had tiki torches,
15 women had candles and we marched through the
16 City of Charlottesville. Went back to the
17 square. I think we sang Tomorrow Belongs To
18 Me, and then we left.

58. PAGE 115:22 TO 117:08 (RUNNING 00:01:32.903)

22 Q. What was chanted while you were
23 marching?
24 A. Blood and soil. Russia is our
25 friend. You will not replace us. Obviously
00116:01 Samantha M. Froelich
02 Jews will not replace us was part of it, but,
03 yeah.
04 Q. What does blood and soil mean?

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05 A. It's a reference to a Nazi
06 phrasing.
07 Q. Did you say a "Nazi phrasing"?
08 A. Yeah.
09 Q. And what does, "You will not
10 replace us mean"?
11 A. Again, it's the -- it is the, in
12 their mind, confirmation of white genocide,
13 that Jewish people are encouraging interracial
14 couples and all -- that "you," as in everyone
15 who's not white, will not replace white
16 people.
17 Q. And that was used at times
18 interchangeably with the phrase "Jews will not
19 replace us"?
20 A. Yeah.
21 Q. You said you marched with -- there
22 were -- that the men marched with torches and
23 the women marched with candles?
24 A. Yes.
25 Q. What, as you understand it, is the
00117:01 Samantha M. Froelich
02 significance of torches?
03 A. I -- the -- what is that group?
04 They liked the esthetic of, I think, Golden
05 Dawn. I think that's what it was. It's like
06 a Greek Far Right party, but it was also just
07 the easiest way to do it, to look
08 intimidating.

59. PAGE 117:09 TO 118:11 (RUNNING 00:01:11.668)

09 Q. Do you recall any discussion of
10 Charlottesville 2.0 taking place during
11 Charlottesville 1.0?
12 A. No.
13 Q. Did you see Richard Spencer at
14 Charlottesville 1.0?
15 A. Yes.
16 Q. Do you recall a time when
17 Mr. Spencer led a group in some sort of Nazi
18 conduct?
19 A. Yes.
20 Q. And can you describe that?
21 A. I was at a party. He showed up at
22 this party. This -- this happened quite
23 often. He would make some sort of
24 announcement, and at the end of the
25 announcement would always be either hail
00118:01 Samantha M. Froelich
02 victory, hail our people, Sieg Heil. And he
03 would say, "Hail victory," then he would say,
04 "Hail," people would say, "Victory." Or,
05 "Hail our people." "Hail." "Our people." And
06 there was this call and response. And every
07 time that you did that, you were expected to
08 Nazi salute to him.
09 Q. And did people Nazi salute back to
10 him?
11 A. Yes.

60. PAGE 118:25 TO 120:14 (RUNNING 00:01:47.059)

25 Q. And can you describe the
00119:01 Samantha M. Froelich
02 interactions you had with Mr. Spencer that
03 weekend?

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04 A. We spoke at a party. We were
05 flirtatious. We left the party together. We
06 were physically intimate. We continued
07 speaking.

08 Q. When you say you were "physically
09 intimate," you mean at some point during the
10 weekend of Charlottesville 1.0?

11 A. Yes.

12 Q. And then you said you "continued
13 speaking."

14 A. Yes.

15 Q. What do you mean by that?

16 A. We carried on a relationship.

17 Q. How long -- when you said you
18 carried on a relationship, did you -- what was
19 the nature of the relationship that you
20 carried on with him?

21 A. I would say the context of that
22 would bleed into itself throughout. I mean, a
23 lot of it had to do with, you know, things
24 that Eli or Richard wanted done or, you know,
25 the inner-workings of Alt Right stuff. At

00120:01 Samantha M. Froelich
02 points it was flirtatious. I was very lonely
03 too, so there was a lot of companionship. I
04 had called him asking him for advice. He
05 would call me as well.

06 Q. So you -- fair to say that you
07 continued to communicate with Mr. Spencer
08 after Charlottesville 1.0?

09 A. Yes.

10 Q. And how often would you say you
11 communicated with him?

12 A. In the beginning I would say it
13 was -- it was daily and then it kind of became
14 farther and fewer in between until the end.

61. PAGE 120:22 TO 121:18 (RUNNING 00:00:58.688)

22 In totality, how long would you
23 say you continued to communicate with
24 Mr. Spencer?

25 A. I met him in May to October. Like
00121:01 Samantha M. Froelich
02 five months.

03 Q. Did you ever speak to Mr. Spencer
04 about his views with respect to Jewish people?

05 A. Yes.

06 Q. And what did Mr. Spencer say to
07 you about Jewish people?

08 A. That they're dirty and disgusting,
09 that they're filthy.

10 Q. Anything else?

11 A. I mean, yeah, plenty. That they
12 were the reason for degeneracy. That they
13 were unable to, I guess, stick to themselves.
14 That they were trying to subvert white people,
15 white culture, white heritage, white legacy.
16 That they promoted degeneracy. That they were
17 scum. That they were gross. That they were,
18 I mean, all kinds of bad things.

62. PAGE 123:05 TO 125:22 (RUNNING 00:03:05.483)

05 Q. Did you ever speak to Mr. Spencer
06 about his views regarding black people?

07 A. Yes.

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08 Q. What did Mr. Spencer say to you
09 about black people?
10 A. I mean, he made no secret about
11 it. He thought that affirmative action was a
12 terrible idea, that it's because of white
13 altruism that black people have any say, any
14 voice, any -- any ability to do anything
15 constructive in society. That white people
16 gave it away because they were trying to do
17 the right thing and that they need to take it
18 back.
19 Q. When you say that Mr. Spencer said
20 white people "need to take it back," take what
21 back?
22 A. Take back the power and majority
23 in terms of rule make -- I mean, to take back
24 the supremacy, I guess, of society.
00124:01 Q. And how did Mr. Spencer believe
Samantha M. Froelich
02 that white people should take supremacy back
03 from black people?
04 A. By any means necessary.
05 Q. Did Mr. Spencer use that phrase,
06 "by any means necessary"?
07 A. Yes.
08 Q. Did Mr. Spencer believe that black
09 people and white people were inherently equal?
10 A. No.
11 Q. And you know that because he said
12 to you that he did not believe that black
13 people and white people are inherently equal?
14 A. Yes.
15 Q. How often would he express that
16 sort of view?
17 A. Any time it came up.
18 Q. And how often, generally speaking,
19 would that come up?
20 A. If -- if I'm to put numbers on it,
21 at least once a week.
22 Q. Did you ever speak to Mr. Spencer
23 about how he perceived his role in the
24 Alt Right?
25 A. Yes.
00125:01 Samantha M. Froelich
02 Q. And how did he express to you how
03 he perceived his role in the Alt Right?
04 A. He told me that this was the
05 closest to being like L. Ron Hubbard and
06 creating his own religion that he was going to
07 get. He was pretty -- he bragged about the
08 fact that people saw him as a God, that young
09 men worshipped him, that women wanted him
10 romantically or sexually or whatever. He
11 was -- he was very interested in remaining the
12 head, the voice, the face of the Alt Right or
13 the Far Right.
14 Q. Did Mr. Spencer ever talk -- or
15 did you ever speak to Mr. Spencer about the
16 role of violence in the Alt Right movement?
17 A. Not in terms of specifics that I
18 remember, but I mean he would often talk about
19 the fact that RaHoWa was going to happen and
20 we needed to be ready for it.
21 Q. And by "RaHoWa," what do you mean?
22 A. The racial holy war.

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63. PAGE 126:03 TO 126:08 (RUNNING 00:00:16.726)

03 Q. And did you ever see Mr. Mosely
04 and Mr. Spencer interact?
05 A. Yes.
06 Q. And where did you observe
07 Mr. Mosely and Mr. Spencer interact?
08 A. At parties, behind closed doors.

64. PAGE 126:12 TO 126:19 (RUNNING 00:00:20.960)

12 Q. Did you ever talk to Mr. Mosely
13 about his views regarding Identity Evropa and
14 Mr. Spencer?
15 A. Yes.
16 Q. And what did Mr. Mosely say about
17 that?
18 A. Eli said he was making IE a
19 militia for -- for Richard Spencer.

65. PAGE 126:22 TO 128:24 (RUNNING 00:02:26.286)

22 Did Mr. Mosely explain to you what
23 he meant when he said that he wanted Identity
24 Evropa to be a militia for Richard Spencer?
25 A. Yes.
00127:01 Samantha M. Froelich
02 Q. And what did Mr. Mosely say he
03 meant by that?
04 A. He said that the -- the movement
05 itself has enough thinkers and they need more
06 doers. Eli had military experience, that he
07 would lead IE to the battleground, he would
08 lead all of this in -- he would lead white
09 people into victory and then -- I mean, then
10 he also said that he would kill Richard and
11 take over all of it. But ultimately, by way
12 of IE and his role in it and his role in terms
13 of Richard Spencer, that he was willing to
14 make an army for Richard.
15 Q. And did understand what Mr. Mosely
16 meant by "thinkers" and "doers"?
17 A. Yes.
18 Q. What did you believe he meant by
19 that?
20 A. He believed that himself, Richard
21 Spencer, the people of the older iteration of
22 the Alt Right or white nationalism were the
23 people that were laying the -- the -- the
24 groundwork of thought and that he needed to --
25 he needed people to take this thought in terms
00128:01 Samantha M. Froelich
02 of the worrying about RaHoWa and all these
03 other things, and he needed people to start
04 taking action.
05 Q. And when you say "taking action,"
06 what sort of action did you understand him to
07 be talking about?
08 A. Running for political office,
09 killing minorities, participating in RaHoWa
10 when and if it happened. I mean, doing
11 things.
12 Q. Are you familiar with
13 Charlottesville 2.0?
14 A. Yes.
15 Q. And was Charlottesville 2.0
16 referred to as Unite the Right?

Sines v Kessler

17 A. Yes.
18 Q. When did you first become aware of
19 plans for Unite the Right?
20 A. Of -- I'm sorry. The -- like the
21 last weekend in May, first weekend in June
22 Jason Kessler went on some Discord server that
23 I was on and said that he was going to plan
24 for this rally.

66. PAGE 132:07 TO 133:10 (RUNNING 00:01:01.895)

07 MR. BLOCH: Ms. Froelich, I'm
08 handing you Plaintiffs' Exhibit 7.
09 (Exhibit 7, Discord chat, is marked
10 for identification.)
11 THE WITNESS: Yes.
12 BY MR. BLOCH:
13 Q. Do you see that?
14 A. Yes.
15 Q. And is that a Discord chat in the
16 Charlottesville 2.0 server?
17 A. Yes.
18 Q. And you're familiar with the
19 Charlottesville 2.0 server?
20 A. Yes.
21 Q. And do you -- well, what was the
22 Charlottesville 2.0 server?
23 A. It was the chat server that anyone
24 attending the Charlottesville rally, the Unite
25 the Right rally could go in and kind of, like,
00133:01 Samantha M. Froelich
02 coordinate or announce that they were
03 participating, see if they could help or get
04 help in terms of getting there, going there,
05 whatever.
06 Q. So was it your understanding that
07 comments posted within the Charlottesville 2.0
08 server were made to help plan some aspect of
09 Unite the Right?
10 A. Yes.

67. PAGE 139:18 TO 141:07 (RUNNING 00:01:46.184)

18 You did have discussions with
19 Mr. Mosely about his objectives for Unite the
20 Right?
21 A. Yes.
22 Q. And how often would you say you
23 had these discussions with Mr. Kline?
24 A. At least once a week.
25 Q. And what did Mr. Kline tell you
00140:01 Samantha M. Froelich
02 were his objectives for Unite the Right?
03 A. I mean, this was his chance to
04 prove that he should be a leader. This was
05 his chance to lead white people into battle.
06 This was his chance to, you know, the -- you
07 know, to throw -- I don't know. This was --
08 this was -- in his mind, this was the start of
09 RaHoWa. This was a -- this was a battle to be
10 fought in the modern civil war, and he was
11 going to lead the troops.
12 Q. Just to be clear, Mr. Kline told
13 you that in his mind Charlottesville 2.0 was
14 to be the start of RaHoWa?
15 A. If not -- if not the start, then
16 one of the battles fought in RaHoWa, yes.

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17 Q. But I just want to be clear, did
18 Mr. Kline tell you that --
19 A. Oh, yes.
20 Q. And so for the record, Mr. Kline
21 told you that he wanted Charlottesville 2.0,
22 the Unite the Right event, to be at least the
23 first battle in the racial holy war?
24 A. Yes.
25 Q. And did Mr. Kline tell you that he
00141:01 Samantha M. Froelich
02 wanted to lead the troops into battle at Unite
03 the Right?
04 A. No, he said he wanted to lead the
05 troops into victory.
06 Q. At Unite the Right?
07 A. Yes.

68. PAGE 141:08 TO 141:23 (RUNNING 00:00:56.991)

08 Q. How many times, approximately, did
09 Mr. Kline say to you in some respect that he
10 wanted to lead the troops into battle at Unite
11 the Right?
12 A. At least three times. I mean,
13 more than that.
14 Q. And when Mr. Kline would tell you
15 that he wanted Unite the Right to be the start
16 of RaHoWa, how would you describe his
17 demeanor?
18 A. He knew it to be true. Like, he
19 was confident that it would happen and he -- I
20 mean, he was looking forward to it. He -- he
21 wanted that war. He wanted to prove that he
22 was a good general or sergeant or whatever.
23 He -- he wanted it.

69. PAGE 142:02 TO 142:14 (RUNNING 00:00:34.751)

02 Did Mr. Kline ever say to you
03 anything violent with respect to Jews in
04 reference to Unite the Right?
05 A. Yeah.
06 Q. What did he say?
07 A. He couldn't wait to crush Jews.
08 He couldn't wait to stomp Jews. It was --
09 that was, again, just the language that he
10 used. He was very violent about his intent.
11 Q. And specifically he said he
12 couldn't wait to crush Jews and couldn't wait
13 to stomp Jews at Unite the Right?
14 A. Yeah.

70. PAGE 142:15 TO 142:20 (RUNNING 00:00:15.185)

15 Q. Did Mr. Kline ever say to you that
16 he wanted right wing death squads to be
17 present at Unite the Right?
18 A. He didn't -- he -- he said they
19 were going to be there, not that he wanted
20 them there, that they were going to be there.

71. PAGE 144:05 TO 144:13 (RUNNING 00:00:22.970)

05 Q. Were you ever present at
06 gatherings that took place in real life where
07 planning for Unite the Right was discussed?
08 A. I believe so, yes.
09 Q. And what sort of gatherings?

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10 A. The Alt Right calls them pool
11 parties, but they're usually just
12 get-togethers, block parties, or, like,
13 barbecues, or just general parties.

72. PAGE 144:22 TO 145:14 (RUNNING 00:00:52.862)

22 Q. Can you describe a specific party
23 where Unite the Right was discussed?

24 A. I mean, after -- I mean, there
25 were -- there were a lot of parties where it
00145:01 Samantha M. Froelich
02 was discussed.

03 Q. So can you tell us about one in
04 particular?

05 A. I mean, there was one after a free
06 speech rally in Washington D.C. Everyone went
07 back to Richard Spencer's house and I want to
08 say that was early enough in the planning,
09 from what I remember, but, I mean, yeah,
10 people talked about it. It was going to be
11 the biggest event that year of the Alt Right
12 and to expect more every six months, and that
13 this was going to be the start of a juggernaut
14 of the Alt Right taking over.

73. PAGE 148:08 TO 149:24 (RUNNING 00:01:45.426)

08 Q. And where was his home located?
09 A. On top of Bl|print Chocolates in
10 Old Town Alexandria, Virginia.

11 Q. And you mentioned parties that you
12 attended at his house or home in the summer of
13 2017.

14 A. Yes.

15 Q. Do you recall Unite the Right
16 being discussed at one of those parties?

17 A. Yes.

18 Q. And what do you recall was being
19 said regarding Unite the Right at Richard
20 Spencer's home in the summer of 2017?

21 A. I mean, they were talking about --
22 you know, there was talk of, like, protesters,
23 and there were talks of, again, what kind of
24 weapons you could use, what chants should be
25 said. It was, you know, nothing by way of
00149:01 Samantha M. Froelich

02 actual safety groups, actual formations, but
03 just like, you know, that -- that ancillary
04 stuff; you know, what should people wear, what
05 should people say, what can people bring,
06 stuff like that.

07 Q. You mentioned that weapons were
08 discussed.

09 A. Yeah.

10 Q. Do you recall what sorts of
11 weapons were discussed during the parties at
12 Richard Spencer's home in the summer of 2017?

13 A. Yeah. I mean, it would be things,
14 like, what can you bring that if you're caught
15 with it, it would look like a defense weapon.
16 What is it if -- I think someone brought up,
17 you know, bring a flagpole, but, then, like,
18 tape a -- like, have a knife tucked in it and,
19 like, tape it in there or, you know, whatever,
20 cauterize it if you need to. You know, have
21 a -- poke holes in your flagpole so that you

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22 can hit faster or have a heavy one so that you
23 hit harder, which is better. Things like
24 that.

74. PAGE 152:13 TO 153:20 (RUNNING 00:01:19.777)

13 Q. Other than discussion of flag
14 poles and those sorts of weapons, do you
15 recall any other violence being discussed at
16 Unite the Right at this party at Richard
17 Spencer's house in the summer of 2017?
18 A. Not at that specific party, but, I
19 mean, there was another one where someone
20 talked about -- you know, then there were
21 talks about laws, and someone had brought up
22 there was, again, like this -- this thing
23 circulating that, like, in North Carolina or
24 in Virginia or somewhere, that if you were on
25 your way to going to -- if you were -- if you
00153:01 Samantha M. Froelich
02 were on your way to work in your car and there
03 was a protest or a rally taking place and you
04 were -- for whatever reason, you could -- you
05 could hit the protester, and the law would be
06 on your side.
07 Q. So is this a different party that
08 you're discussing where you --
09 A. Yeah.
10 Q. -- heard that?
11 A. Yeah.
12 Q. And where was that party?
13 A. Also at Richard's.
14 Q. Okay. So you were present for a
15 party at Richard's -- was this in the summer
16 of 2017?
17 A. Yes.
18 Q. And was this at the same home that
19 you previously described?
20 A. Yes.

75. PAGE 153:23 TO 155:23 (RUNNING 00:02:34.186)

23 You were present at a party at
24 Richard Spencer's home during the summer of
25 2017 where somebody at the party was
00154:01 Samantha M. Froelich
02 discussing whether it was legal to run over
03 counter-protesters. Is that fair to say?
04 A. Yes.
05 Q. And do you recall -- well, was
06 Richard Spencer present at that party?
07 A. At the party, yes.
08 Q. Was Eli Mosely present at the
09 party?
10 A. Yes.
11 Q. And can you describe as
12 specifically as you can remember what that
13 person said with regard to the legality of
14 running over counter-protesters?
15 A. Exactly that, the person had said
16 that a law was passed in some state that if
17 you were on your way to work and there was
18 a -- and there was a commie or a
19 counter-protester in your way from getting to
20 work, that you could hit them and the law
21 would be on your side.
22 Q. And was it your impression that

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23 that discussion took place in the context of
24 discussing what was legal to do at Unite the
25 Right?
00155:01 Samantha M. Froelich
02 A. Yes.
03 Q. Do you recall specifically who
04 said that?
05 A. No.
06 Q. Do you recall how many people were
07 present for that discussion?
08 A. No. Maybe a handful.
09 Q. You said that -- well, you used
10 the phrase, "You could hit them."
11 What do you mean by that?
12 A. That if you were in your car and
13 there was a counter-protester in the street or
14 in your -- in your way, that you could use
15 your vehicle to hit them, get them out of your
16 way.
17 Q. To drive into them?
18 A. Yes.
19 Q. And you recall somebody discussing
20 that in a group at a party at Richard
21 Spencer's home in the summer of 2017; is that
22 right?
23 A. Yes.

76. PAGE 156:08 TO 156:12 (RUNNING 00:00:07.933)

08 Q. Ms. Froelich, did you attend Unite
09 the Right?
10 A. I did not.
11 Q. Why not?
12 A. I worked.

77. PAGE 157:07 TO 158:11 (RUNNING 00:01:22.489)

07 Q. Were you concerned that there
08 would be violence at Unite the Right?
09 A. Yes.
10 Q. Is that why you didn't attend?
11 A. Yeah, I mean, there were so many
12 reasons why I didn't attend, but that was
13 absolutely one of them.
14 Q. And did you discuss that with
15 anybody?
16 A. Yeah.
17 Q. Who?
18 A. The women I was planning the after
19 party with, other people behind the scenes.
20 Q. And specifically what is it that
21 you discussed with them?
22 A. I mean, I discussed my worry that
23 this would be a violent situation. I had said
24 that I hoped the city would shut it down.
00158:01 Q. Did you speak to Mr. Kline after
Samantha M. Froelich
02 Unite the Right?
03 A. Yes.
04 Q. And when is it that you spoke with
05 him?
06 A. I don't remember if he called. I
07 actually think he ignored a lot of my texts
08 and stuff for the following day or so. But I
09 remember when he came back, I was in the
10 kitchen and we spoke, like, we went off in
11 private and spoke.

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78. PAGE 158:18 TO 159:02 (RUNNING 00:00:20.343)

18 Q. Okay. And where was that? What
19 city?
20 A. Leesburg, Virginia.
21 Q. And when is it that you recall
22 speaking to him the first time after Unite the
23 Right?
24 A. When I was in the kitchen, he had
25 come back, I think, like, the -- the following
00159:01 Samantha M. Froelich
02 day or the day after that.

79. PAGE 159:08 TO 160:02 (RUNNING 00:00:51.563)

08 Q. And what did Mr. Kline say to you
09 regarding Unite the Right at that moment?
10 A. He had this thing where he would
11 like to talk about himself in third person and
12 say, you know, "Your boyfriend is smart. Your
13 boyfriend's this." And when we finally spoke,
14 he said, "Your boyfriend's a fucking war
15 hero." And then he started to tell me about
16 how he got to fight someone, like street fight
17 someone; and that people on the opposition
18 actually helped him when he was pepper sprayed
19 in the eye or something, that he almost went
20 blind, that it was a success overall, that
21 everything was great, that he was -- that he
22 was doing it. He was leading people.
23 Q. And how would you describe his
24 demeanor during that conversation?
25 A. Proud, ecstatic. He was thrilled
00160:01 Samantha M. Froelich
02 with himself.

80. PAGE 160:10 TO 161:04 (RUNNING 00:00:46.065)

10 Q. Ms. Froelich, when did you leave
11 Identity Evropa?
12 A. October 18th or 19th, 2017.
13 Q. And are you -- I believe I asked
14 you this before, but are you currently -- do
15 you consider yourself a member of the
16 Alt Right --
17 A. No.
18 Q. -- today?
19 A. No, no, no.
20 Q. And when did you leave the
21 Alt Right?
22 A. I officially left the Alt Right
23 October 18th, 2017.
24 Q. And since leaving the Alt Right,
25 have you reached out to others that are still
00161:01 Samantha M. Froelich
02 in the Alt Right?
03 A. Not particularly. I do try and
04 help people that are trying to leave, though.

81. PAGE 161:12 TO 161:16 (RUNNING 00:00:10.804)

12 Q. Are you associated with any
13 organizations that do de-radicalization work?
14 A. Yes.
15 Q. Which organizations?
16 A. I am in Life After Hate.

