

ANTI-WEAPONIZATION FUND FORMAL CLAIM SUBMISSION

**DreamTeam Development, LLC
Wimkin Truth Social Media, LLC**

CLAIMED DAMAGES: \$100,000,000+

Representative submission concerning alleged governmental targeting, federal investigative stigmatization, app-store suppression, monetization destruction, media amplification, intelligence-linked monitoring, and resulting enterprise destruction involving the Wimkin platform.

REVISED 5/21/2026

FORMAL CLAIM LETTER

May 21, 2026

Acting Attorney General Todd Blanche
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

RE: Anti-Weaponization Fund Claim Submission – Wimkin Platform Suppression and Enterprise Destruction - REVISED 5/21/26

Dear Acting Attorney General Blanche: Please accept the enclosed Anti-Weaponization Fund Claim Submission on behalf of DreamTeam Development, LLC, Wimkin Truth Social Media, LLC, and undersigned founder Jason C. Sheppard. This submission concerns the alleged coordinated suppression and destruction of the Wimkin platform following January 6, 2021 through the cumulative interaction of governmental investigative targeting, intelligence-linked monitoring references, mainstream media amplification, app-store suppression, monetization disablement, and payment-processing restrictions.

Representative Evidence Included in Submission

- January 6 Select Committee preservation and production demands directed toward Wimkin and Jason C. Sheppard;
- Federal iCOP monitoring references involving Wimkin;
- Select Committee deposition and interview excerpts referencing Wimkin under oath;
- Mainstream media publications associating Wimkin with January 6, extremism, militias, violence, and QAnon narratives;
- Google Play enforcement notices and policy actions;
- Google AdMob disablement notices and advertising monetization impacts;
- PayPal limitation notices and subscription/payment disruption;
- App-store ranking evidence demonstrating rapid growth prior to suppression activity;
- Revenue, monetization, and business interruption documentation.

Claimants allege that the foregoing actions collectively caused catastrophic and irreversible damage to Wimkin's growth trajectory, monetization capability, investor confidence, enterprise valuation, reputation, and network-effect scaling potential. Claimants further allege that governmental investigative targeting and intelligence-linked stigmatization materially contributed to the commercial destruction of the platform by creating a regulatory and reputational environment causing private ecosystem actors to suppress, disable,

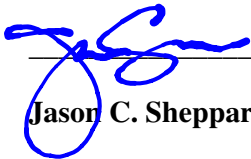
restrict, or distance themselves from Wimkin. The enclosed evidentiary package demonstrates that the alleged damages were not caused by isolated market forces, but by a coordinated ecosystem collapse involving governmental pressure, media amplification, app-store suppression, and monetization destruction.

Claimed Damages

- Lost enterprise value and platform scaling opportunity;
- Lost advertising and AdMob revenue;
- Lost subscription and payment-processing revenue;
- Lost user-growth compounding and network effects;
- Investor deterrence and reputational destruction;
- Permanent suppression-related business interruption.

Claimants presently estimate damages and lost enterprise value at no less than One Hundred Million Dollars (\$100,000,000.00). The exhibits enclosed constitute only a very small representative sample of the broader evidentiary record presently known to Claimants. Claimants expressly reserve the right to supplement this submission with additional records, analytics, sworn materials, valuation analyses, governmental records, technical records, and evidentiary documentation.

Respectfully submitted,

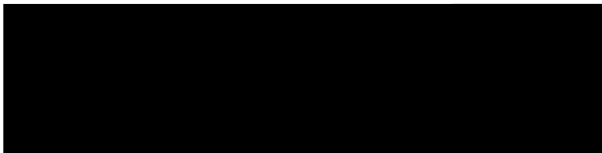


Jason C. Sheppard

Founder

DreamTeam Development, LLC

Wimkin Truth Social Media, LLC



EXECUTIVE SUMMARY


Wimkin launched in September 2020 during a historic migration away from legacy social-media platforms. By January 2021, Wimkin had rapidly scaled to approximately 350,000 users and approximately 500,000 monthly visits with strong app-store ranking momentum, advertising monetization, and subscription/payment infrastructure. Surviving screenshots demonstrate Wimkin reaching Top 5 Trending status and approximately #17 among social applications on Google Play. Claimants further state that Wimkin reached #1 app-store rankings in multiple categories on multiple occasions between November 2020 and January 2021. Following January 6, 2021, Wimkin became associated with Congressional investigative activity, federal monitoring narratives, intelligence-linked references, mainstream media reporting, app-store enforcement actions, monetization disablement, and payment-processing restrictions. Claimants allege that these events collectively impaired discoverability, monetization, investor confidence, public trust, user-growth velocity, and the network effects required for Wimkin to mature into a large-scale social-media enterprise.

Core Allegations

- Governmental investigative targeting materially contributed to reputational destruction;
- Federal iCOP references associated Wimkin with intelligence and monitoring narratives;
- Congressional January 6 investigative activity amplified reputational risk;
- Mainstream media amplification reinforced suppression narratives;
- Google Play enforcement and AdMob disablement impaired distribution and monetization;
- PayPal restrictions impaired subscription and payment infrastructure;
- The cumulative ecosystem response destroyed Wimkin's growth trajectory and enterprise valuation.

VERIFICATION UNDER PENALTY OF PERJURY

I, Jason C. Sheppard, hereby declare under penalty of perjury under the laws of the United States of America that I am the founder of the entities identified herein, that I have personal knowledge concerning many of the matters stated in this submission, and that the factual statements contained herein are true and correct to the best of my knowledge, information, and belief. I further declare that the exhibits attached to this submission are authentic copies or representative excerpts of records maintained or obtained by Claimants in the ordinary course of business or investigation. Executed on May 21, 2026.



Jason C. Sheppard

WIMKIN

**ANTI-WEAPONIZATION CLAIM FOR
RELIEF**

DreamTeam Development, LLC, Wimkin Truth Social Media, LLC,
and Principal Jason C. Sheppard

CLAIMED DAMAGES / LOST ENTERPRISE VALUE: \$100,000,000+

Government-facing evidentiary submission concerning alleged federal weaponization, intelligence-linked monitoring, Big Tech enforcement, mainstream media amplification, app-store suppression, AdMob disablement, PayPal/API disruption, traffic loss, sponsorship loss, Section 230 burdens, First Amendment injury, and enterprise destruction.

REVISED 5/21/26

I. EXECUTIVE SUMMARY

Wimkin launched in September 2020 and rapidly scaled during late 2020 and early 2021. By January 2021, Wimkin had approximately 350,000 registered users, approximately 500,000 monthly visits, active Google AdMob monetization, active PayPal subscription and payment infrastructure, national visibility, and significant app-store ranking momentum. Surviving screenshots show Wimkin as Top 5 Trending and approximately #17 among social applications on Google Play, and Claimants state that Wimkin reached #1 in multiple app-store categories multiple times between approximately November 2020 and January 2021.

The newly added USPS and iCOP records materially strengthen the claim. They show that federal law-enforcement/intelligence-linked personnel specifically identified Wimkin before January 6, 2021. The December 30, 2020 Situational Awareness Bulletin titled "Wimkin and the Million Militia March" identifies Wimkin as a new "uncensored social media" platform, describes it as quickly becoming an alternative to Parler and Gab, references the platform founder, and associates the platform with inauguration-related activity.

That chronology is critical. The claim is no longer merely that Wimkin was punished after January 6. The record now shows pre-January 6 federal identification, followed by media escalation, app-store pressure, Google Play enforcement, AdMob disablement, payment disruption, Congressional demands, and repeated sworn deposition references. Claimants allege this sequence created a regulatory and reputational risk signal that foreseeably induced or materially contributed to private ecosystem actors suppressing, disabling, restricting, or distancing themselves from Wimkin.

This submission therefore presents a dated, document-supported causation chain: pre-January 6 federal monitoring, public and private risk amplification, platform enforcement, monetization elimination, payment disruption, network-effect destruction, reputational injury, and lost enterprise value.

Core Allegation	Evidence / Record Support
Pre-January 6 federal identification	USPS/iCOP records identifying Wimkin, referencing the founder, and discussing alleged inauguration-related activity.
Explosive pre-suppression growth	App-store ranking screenshots, user totals, traffic estimates, AdMob activity, and PayPal subscriptions.
Government risk signal to private enforcement	Federal monitoring, public-safety framing, media amplification, and later Committee demands.
Commercial destruction	App-store access impaired, AdMob disabled, PayPal/API disrupted, traffic and sponsorship opportunities damaged.
Continuing harm	AdMob/Adsense restrictions, reputational stigma, investor deterrence, and lost network-effect compounding.

II. INTERLOCKING CHRONOLOGY OF EVENTS

The chronology below is submitted to show interlocking proximity and causation. Claimants do not contend that every private decision required an express written government instruction. Claimants contend that federal identification, law-enforcement/intelligence-linked characterization, media amplification, app-store enforcement, monetization disablement, and payment-rail disruption occurred in a connected sequence that made commercial destruction foreseeable.

Date / Period	Event	Causation Significance
Sept.-Oct. 2020	Wimkin launches and begins monetizing through AdMob and subscription/payment infrastructure.	Establishes pre-suppression business activity and revenue rails.
Nov. 2020-Jan. 2021	Wimkin reaches major app-store visibility, including Top 5 Trending, approximately #17 social ranking, and claimed #1 category placements.	Shows exponential user-acquisition and network-effect acceleration before suppression.
Dec. 22-30, 2020	USPS and iCOP records identify Wimkin, reference the founder, and discuss alleged inauguration-related activity.	Establishes federal law-enforcement/intelligence-linked awareness before January 6.
Jan. 10-11, 2021	Media and Associated Press coverage describes pressure on alternative platforms and names Wimkin among smaller sites facing public and law-enforcement pressure.	Shows broader pressure environment immediately after January 6 and before later Wimkin enforcement actions.
Jan. 14-17, 2021	Google Play and Apple-related enforcement pressure escalates through 24-hour UGC/violence notices and app-store removal environment.	Dominant app-distribution channels come under immediate threat.
Jan. 19, 2021	Google Play removal and AdMob ad-serving disablement tied to Wimkin applications.	Directly impairs discoverability and automated advertising revenue.
2021 onward	PayPal/API disruption impairs subscriptions and credit-card acceptance; replacement interface allegedly exceeds \$250,000.	Creates direct infrastructure injury, hard cost, lost payment continuity, and subscription churn.
Nov. 18, 2021	January 6 Committee serves preservation and production demands on Wimkin/Jason Sheppard.	Formal Congressional inclusion of Wimkin in January 6 investigative framework.
2022 investigative period	Multiple January 6 deposition and interview excerpts reference Wimkin.	Pattern evidence that Wimkin was repeatedly cataloged and questioned in sworn investigative proceedings.

III. PROXIMATE CAUSATION: FEDERAL RISK SIGNAL, DE FACTO PROXY, AND INDUCED ENFORCER THEORY

The expected Terms of Service defense is that Apple, Google, AdMob, PayPal, sponsors, advertisers, and other private actors acted independently because of user-generated content violations. Claimants allege that explanation is incomplete. It ignores that Wimkin had already been federally identified, characterized, and associated with alleged inauguration-related activity before January 6 and before the later private enforcement cascade.

Government action need not appear as a direct written order to become causally significant. Where a federal law-enforcement/intelligence-linked program identifies, describes, and stigmatizes a small emerging platform in connection with politically charged speech and alleged threat activity, private infrastructure providers may predictably treat that platform as a regulatory, reputational, and brand-safety risk. That is the core government-risk-signal theory.

Claimants allege that the December 2020 USPS/iCOP records are among the strongest causation evidence presently known because they place federal attention before the takedown cascade. The records identify Wimkin by name, reference the founder, describe the platform ideologically, and associate it with alleged inauguration-related activity. The subsequent sequence - media amplification, app-store enforcement, AdMob disablement, PayPal/API disruption, Committee demands, deposition references, sponsor flight, investor deterrence, traffic collapse, and reputational destruction - is alleged to be the foreseeable commercial result of that risk signal.

Step	Causal Link	Function
1	Federal identification and risk characterization	Wimkin becomes a government-identified platform of concern before January 6.
2	Media and public-safety amplification	The risk narrative is repeated publicly and commercially.
3	Private compliance and brand-safety fear	App stores, ad networks, payment processors, sponsors, and investors perceive elevated risk.
4	Infrastructure enforcement	Distribution, monetization, payment rails, and sponsorship opportunities are impaired.
5	Commercial death spiral	Traffic, installs, recurring payments, direct ads, investor confidence, and network effects collapse.

IV. TERMS OF SERVICE REBUTTAL AND DOUBLE-STANDARD EVIDENCE

Claimants do not contend that harmful user content never existed. The claim is that Wimkin was treated as a politically toxic platform because of its identity, user base, federal attention, and public January 6 association, while larger mainstream platforms hosted controversial, election-related, or January 6-related content at scale without comparable permanent infrastructure destruction.

Wimkin attempted compliance. Media exhibits show that Wimkin removed flagged posts, increased moderation personnel, added filters, considered Google Vision/image recognition, required approvals for certain groups/pages, and implemented additional user-reporting and live-stream monitoring measures. Claimants allege that commercial destruction despite attempted compliance supports the inference that ordinary TOS enforcement is not a complete explanation.

The double-standard evidence to be supplemented through investigation includes comparator content, comparator enforcement records, internal platform risk assessments, brand-safety communications, payment processor notes, sponsor withdrawal communications, government or law-enforcement contacts, and any records showing whether private platforms acted because of regulatory fear rather than neutral enforcement alone.

Comparator Issue	Wimkin Treatment	Causation Inference
User-generated January 6 content	App-store enforcement, AdMob disablement, payment disruption, and media stigma.	Disproportionate response suggests risk-based targeting beyond routine TOS enforcement.
Larger mainstream platforms	Mainstream platforms generally retained core app, ad, payment, and cloud infrastructure.	Different treatment supports inquiry into political/governmental spotlight as a causal factor.
Wimkin mitigation efforts	Moderation measures, content removal, policy updates, and compliance submissions.	Destruction despite remediation supports proxy/induced enforcement theory.

V. TECHNOLOGY VALUATION AND NETWORK-EFFECT DAMAGES

Claimants submit the damages claim as a technology-platform valuation framework grounded in user growth, monetization, app-store visibility, traffic, subscription infrastructure, sponsorship potential, payment rails, reputational value, and network-effect economics, subject to supplementation by forensic economic analysis.

The first framework is value per user. A rapidly scaling social platform can be valued by applying a defensible value-per-user range to its active user base and growth trajectory. The second framework is network-effect velocity. Social platforms do not grow linearly. Each additional user increases content, engagement, invitations, referrals, impressions, groups, pages, ad inventory, subscription opportunity, and acquisition value.

The damages were therefore not limited to existing revenue or existing users. Claimants allege the targeted harm was the severing of an active user-acquisition engine at the moment of steep growth. A platform with approximately 350,000 users, hundreds of thousands of monthly visits, Top 5 Trending status, active AdMob revenue, active PayPal subscriptions, and national visibility had meaningful enterprise value and but-for growth potential.

Framework	Application to Wimkin	Damage Relevance
Value Per User	Users x defensible platform VPU range = enterprise value baseline.	Converts user base and growth into auditable valuation methodology.
Network Effects	Value increases as users, content, impressions, groups, referrals, and ad inventory compound.	Explains why halting growth at 350,000 users caused damages beyond current revenue.
Ranking Velocity	Top 5 Trending, approximately #17 social ranking, and claimed repeated #1 category placements.	Shows active distribution acceleration, not decline.
But-For Growth	Uninterrupted app-store access, AdMob, PayPal, sponsorships, and traffic would have allowed compounding.	Supports lost opportunity and enterprise value damages.

VI. INFRASTRUCTURE DEATH BLOWS AND REVENUE EXTRAPOLATION

The most important damages are infrastructure damages. App-store suppression harmed discoverability. AdMob disablement harmed advertising monetization. PayPal/API disruption harmed subscriptions and ordinary credit-card acceptance. Loss of web and app traffic harmed sponsorships, user-generated advertising, direct ad sales, investor viability, and the network effects necessary to become a major social-media platform.

At approximately 500,000 users and visits, Wimkin was already generating approximately \$2,000 per day through AdMob. Had the platform reached 10,000,000 users and visits, even a conservative scale model supports advertising revenue exceeding \$20,000 per day before sponsorships, direct ads, user-generated advertising products, or higher-value ad formats.

PayPal subscriptions were approximately \$25,000 per month before the payment disruption. At a conservative 5x growth scale, recurring subscription revenue would have exceeded \$125,000 per month, or \$1,500,000 annually, before upsells, business accounts, paid features, donation products, creator monetization, and user-generated ads. The PayPal API disruption allegedly made it impossible for Wimkin to accept credit cards through its existing interface until a replacement system was built at a cost exceeding \$250,000, before lost sales, lost subscribers, lost processing continuity, and churn.

Stream	Known / Claimed Baseline	But-For Extrapolation
AdMob advertising	\$2,000/day at approximately 500,000 users/visits.	At 10,000,000 users/visits, more than \$20,000/day is reasonable after conservative discounting.
AdMob annualized	\$2,000/day equals approximately \$730,000/year before full scale.	\$20,000/day equals approximately \$7,300,000/year, excluding sponsorships and direct ads.
PayPal subscriptions	Approximately \$25,000/month.	Minimum 5x scale equals \$125,000/month or \$1,500,000/year.
Payment infrastructure	Existing workflow disrupted.	Replacement interface allegedly exceeded \$250,000, excluding downtime and lost revenue.
Sponsorship/direct ads	Audience growth created sellable inventory.	Loss includes sponsorships, self-serve ads, and web/app traffic monetization.

VII. DIRECT COSTS, TRAFFIC LOSS, AND EXPERT SUPPLEMENTATION

Claimants submit that damages are not limited to projected enterprise value. Direct categories include development investment, hosting, moderation systems, security systems, app deployment, branding, support, engineering time, traffic loss, sponsorship loss, user-generated ad loss, and payment-interface replacement costs. These categories are independently measurable through accounting records, server logs, app analytics, sessions, installs, returning users, notification engagement, page views, referral patterns, sponsor communications, and development records.

Claimants further state that the damages model should be supplemented by an independent forensic accounting or economic loss report upon formal intake, discovery, or administrative hearing. Such a report should calculate average revenue per user, AdMob CPM, fill rate, impression volume, monthly recurring revenue, lifetime value, churn from PayPal/API disruption, lost credit-card processing, lost web/app traffic, lost sponsorship inventory, user-generated ad opportunity, value per user, network-effect valuation, and comparable platform valuation data.

Expert Input	Data Needed	Purpose
Forensic accounting	PayPal, AdMob, bank, subscription, and expense records.	Quantifies hard revenue loss, MRR, churn, and direct cost.
Economic loss analysis	Traffic, users, rankings, growth rates, retention, ad inventory.	Models but-for growth and lost enterprise trajectory.
Technology valuation	Comparable social-platform valuations and VPU metrics.	Supports enterprise valuation and acquisition value.
Discovery from platforms	Internal risk assessments, enforcement notes, and government contacts.	Tests ordinary TOS defense versus government-induced enforcement.
Government records	iCOP, Congressional, law-enforcement, interagency, and investigative references.	Confirms federal targeting, monitoring, and risk-signal causation.

VIII. SECTION 230, FIRST AMENDMENT, AND STATE-ACTION THEORY

Section 230 principles are central to this claim. Wimkin was an interactive computer service hosting third-party user-generated content. Claimants allege the ecosystem response punished Wimkin as the publisher or speaker of the most inflammatory third-party posts, despite Wimkin efforts to remove unlawful threats, expand moderation, implement filters, add moderators, and comply with app-store demands.

The First Amendment theory is likewise central. Claimants recognize that private companies ordinarily make private moderation decisions. But this record involves federal monitoring, law-enforcement/intelligence-linked records, Congressional investigative targeting, deposition questioning, and national media narratives occurring contemporaneously with Big Tech enforcement, advertising disablement, and payment-processing disruption.

Claimants allege that government action materially encouraged, pressured, induced, or contributed to private suppression by creating a regulatory and reputational environment in which Wimkin became commercially toxic. When government actors identify, investigate, monitor, stigmatize, or pressure a platform because of hosted political speech, and private ecosystem actors then remove distribution, monetization, payment access, sponsorship, and advertising opportunities, First Amendment and state-action concerns are directly implicated.

State-Action Position: The record supports investigation into whether private platforms acted as de facto state actors or induced enforcers responding to regulatory fear, federal investigative pressure, or government-created reputational risk rather than neutral, routine Terms of Service enforcement.

IX. DAMAGES SCHEDULE

Claimants seek damages and compensation of at least \$100,000,000. This amount reflects lost enterprise value, lost advertising revenue, lost subscription revenue, lost traffic, lost sponsorships, lost user-generated ads, PayPal/API replacement costs, lost network effects, reputational destruction, investor deterrence, operational harm, constitutional harm, and suppression-related business interruption.

Damage Category	Claimed Amount	Basis / Formula
Lost enterprise valuation	\$45,000,000	VPU, network effects, ranking velocity, alternative-platform market conditions, and lost acquisition/investment opportunity.
Lost AdMob/app advertising revenue	\$15,000,000	\$2,000/day baseline at approx. 500,000 users/visits; 10,000,000-user scale supports more than \$20,000/day plus compounding.
Lost PayPal subscriptions/payment revenue	\$12,500,000	\$25,000/month baseline; minimum 5x scale equals \$125,000/month, plus LTV and churn from payment disruption.
PayPal API/credit-card replacement	\$250,000+	Hard implementation cost to replace payment/card-processing interface after PayPal/API disruption.
Lost sponsorships/direct/user-generated ads	\$10,000,000	Lost sponsorships, direct ad deals, self-serve advertising, user-generated ads, and traffic monetization.
Lost traffic, acquisition, and network effects	\$12,250,000	Loss of app-store discovery, mobile retention, referrals, content creation, and exponential user-growth engine.
Reputational/governmental/investor harm	\$5,000,000+	Government scrutiny, iCOP references, deposition references, media amplification, advertiser and investor deterrence.
Total claimed damages	\$100,000,000+	Conservative claim model subject to expert supplementation, records, and discovery.

X. RECORDS NECESSARY TO COMPLETE THE CAUSATION RECORD

Claimants request preservation and review of records necessary to complete the causal bridge between federal action and private ecosystem suppression. The most important evidence is likely held by government entities and third-party platforms.

Holder	Records Requested	Why It Matters
Federal government	iCOP records, USPS records, January 6 Committee communications, law-enforcement dissemination, interagency references.	Confirms federal targeting, monitoring, and risk-signal causation.
Apple / Google	Internal risk assessments, government contacts, escalation notes, comparator enforcement records.	Tests ordinary TOS defense versus government-induced enforcement.
Google AdMob	Ad-serving rationale, account notes, dashboards, CPM, fill-rate, impressions.	Quantifies advertising loss and causation.
PayPal	Limitation rationale, compliance notes, API/payment records, subscription disruption data.	Quantifies payment loss, churn, and API damage.
Sponsors / advertisers	Withdrawal records, declined deals, brand-safety concerns.	Quantifies sponsorship and direct ad loss.
Claimants	Analytics, logs, installs, sessions, traffic, payments, development costs.	Supports but-for growth and financial damages.

MASTER EXHIBIT INDEX

The exhibit sequence begins with federal identification and monitoring before January 6, then moves through pre-suppression growth, media pressure, app-store enforcement, monetization collapse, payment disruption, Congressional targeting, and sworn deposition references.

Ex.	Category	Document Description / Evidentiary Significance
A-1	USPS / iCOP Intelligence Records	December 2020 USPS and iCOP intelligence materials specifically identifying Wimkin, referencing the founder, and connecting the platform to alleged inauguration-related activity before January 6, 2021.
A-2	Government Monitoring / iCOP Reporting	POLITICO reporting concerning Postal Inspection Service iCOP monitoring, including Wimkin references and statements that iCOP was actively monitoring Wimkin-related activity.
A-3	Government Monitoring / iCOP Reporting	CREW reporting concerning USPS iCOP monitoring, law-enforcement circulation, and references to Wimkin.
B-1	Growth / App Rankings	Surviving Google Play ranking screenshots showing Top 5 Trending and approximately #17 social-app ranking status before suppression.
C-1	Mainstream Media	Christian Science Monitor / Associated Press article identifying post-January 6 platform pressure and naming Wimkin among smaller sites facing public and law-enforcement pressure.
C-2	Mainstream Media	Hartford Courant / Associated Press article concerning coordinated Parler infrastructure removals, app-store loss, web-hosting disruption, and broader platform pressure referencing Wimkin.
C-3	Mainstream Media	Media compilation associating Wimkin with January 6, app-store removals, violence concerns, extremism narratives, QAnon, militias, platform suppression, and business destruction.
D-1	App Store Enforcement	Google Play Enforcement Notice - January 14, 2021.
D-2	App Store Enforcement	Google Play Enforcement Notice - January 15, 2021.
D-3	App Store Enforcement	Google Play Enforcement Notice - January 17, 2021.
E-1	Monetization - AdMob	AdMob earnings records and January 19, 2021 ad-serving disablement evidence.
F-1	Monetization - PayPal	PayPal limitation notices, API disruption, subscription impairment, and payment-processing disruption evidence.
G-1	Congressional / Regulatory	January 6 Committee preservation and production demands directed to Wimkin and Jason C. Sheppard.
H-1	January 6 Depositions	Patrick Casey deposition excerpt referencing Wimkin.
H-2	January 6 Depositions	Robert Schornack interview excerpt referencing Wimkin.
H-3	January 6 Depositions	Annie Howell deposition excerpt referencing Wimkin.
H-4	January 6 Depositions	Stephen Ayres deposition excerpt referencing Wimkin.
H-5	January 6 Depositions	John D. Wright deposition excerpt referencing Wimkin.
H-6	January 6 Depositions	Lewis Easton Cantwell deposition excerpt referencing Wimkin.

The exhibits attached constitute only a very small representative sample of the broader body of evidence presently known to Claimants.

SUPPLEMENTAL DAMAGES & ADMINISTRATIVE FRAMEWORK ADDENDUM

I. CONSERVATIVE ECONOMIC DISCOUNT MODEL

Claimants clarify that the projected growth metrics contained in this submission are not represented as guaranteed outcomes. Instead, the valuation framework utilizes recognized venture-growth and network-effect modeling principles based upon comparable social-media platform adoption curves during the 2020-2021 period. The projections are therefore intended as probability-weighted enterprise valuation scenarios rather than mathematically certain future revenues.

To remain conservative, the projected 10,000,000-user model should be interpreted with an implied discount curve for engagement variability, monetization variability, advertising-rate fluctuation, platform competition, regulatory volatility, and macroeconomic uncertainty. Even after applying substantial discount assumptions, Claimants maintain that the commercial destruction inflicted upon Wimkin resulted in catastrophic loss of enterprise trajectory, monetization potential, sponsorship pipeline value, investor confidence, and long-term network-effect compounding.

II. KEEPSEAGLE ADMINISTRATIVE SETTLEMENT FRAMEWORK

Claimants further note that the requested administrative compensation structure is consistent with prior federally administered settlement and claims-resolution mechanisms, including the framework utilized in *Keepseagle v. Vilsack*, No. 1:99-cv-03119 (D.D.C. 2010). That settlement architecture demonstrates that large-scale federal administrative compensation programs may be structured outside conventional litigation adjudication channels while remaining operationally insulated from ordinary collateral procedural challenges.

Claimants therefore submit that the Anti-Weaponization compensation framework represents an appropriate administrative mechanism for addressing documented constitutional harms, government-induced suppression, reputational destruction, commercial interference, and resulting enterprise-value collapse.

EXHIBIT A-1

USPS / ICOP INTELLIGENCE RECORDS

December 2020 USPS and iCOP intelligence materials specifically identifying Wimkin, referencing the founder, and connecting the platform to alleged inauguration-related activity before January 6, 2021.

This cover sheet immediately precedes the exhibit identified above.



UNITED STATES POSTAL INSPECTION SERVICE

THREAT ASSESSMENT || Cybercrime and Analytics LAW ENFORCEMENT SENSITIVE

Intelligence Summary

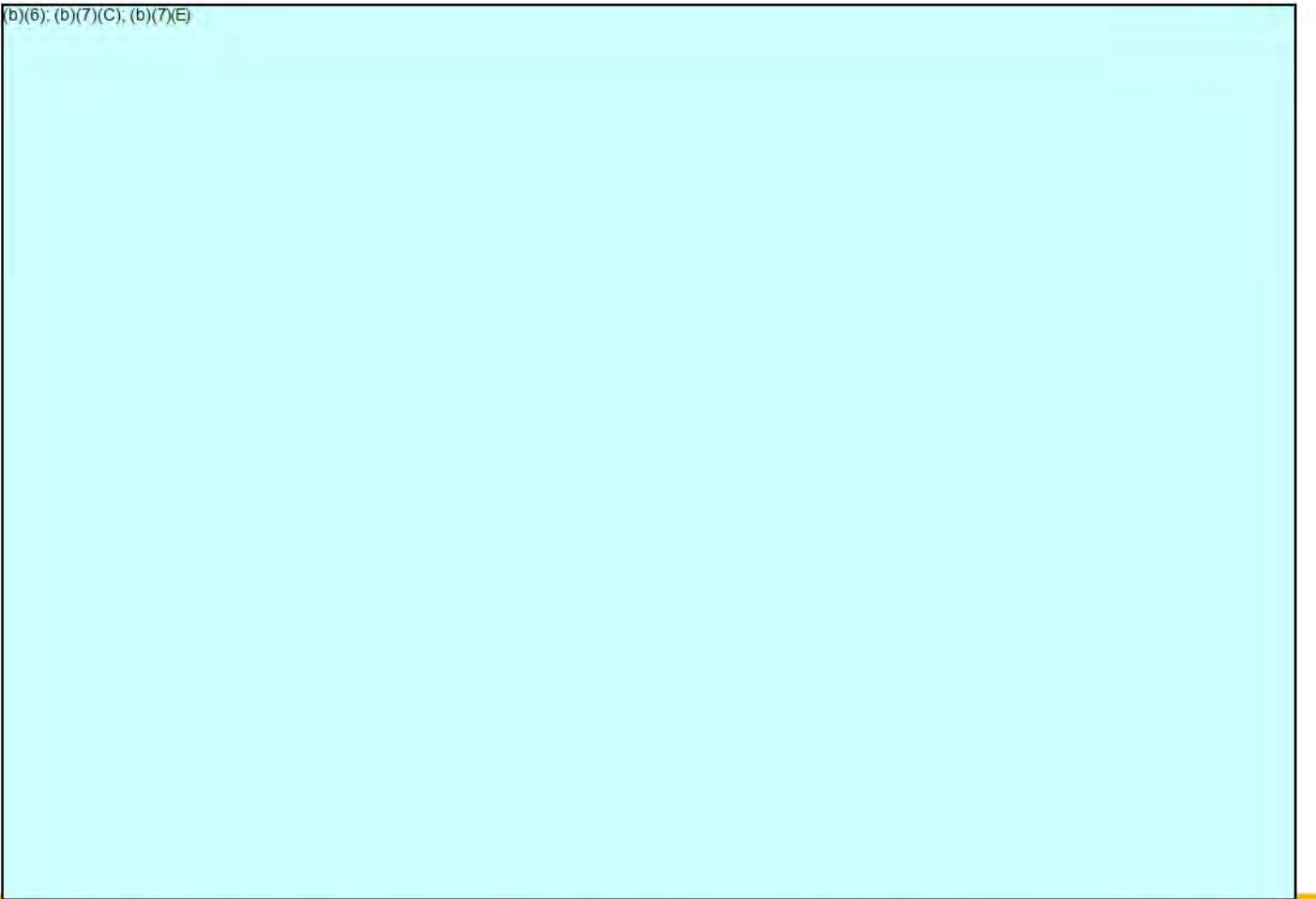
Right-Wing Extremist Website Organizing Violent Action on Inauguration Day

(b)(6); (b)(7)(C); (b)(7)(E)



Analysis

(b)(6); (b)(7)(C); (b)(7)(E)





(b)(6); (b)(7)(C); (b)(7)(E)

Threat Assessment

(b)(6); (b)(7)(C); (b)(7)(E)

'Wimkin' titled the 'MillionMilitiaMarch.' The event is scheduled to take place on January 20, 2021 in Washington, DC and is promoting the same goal of preventing the Inauguration by use of violent means.

(b)(3); 39 USC 410 (c)(6); (b)(7)(E)

End of Report

(b)(6); (b)(7)(C); (b)(7)(E)



Attachments

(b)(6); (b)(7)(C); (b)(7)(E)



THREAT ASSESSMENT

// LAW ENFORCEMENT SENSITIVE //

Date:	December 28, 2020
Analyst:	(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)	

Intelligence Summary

(b)(6); (b)(7)(C)

On December 25, 2020 at approximately 10:31AM EST, [redacted] Salt Lake City, UT, forwarded a potential threatening email from, [redacted] which stated in the subject line: "YOU ARE REALLY NOT GETTING AWAY WITH IT THIS TIME". The body of the email was left blank.

Analytical Results

(b)(6); (b)(7)(C); (b)(7)(E)

[Redacted analytical results section]



INTELLIGENCE ANALYSIS REPORT

// LAW ENFORCEMENT SENSITIVE //



(b)(6); (b)(7)(C); (b)(7)(E)

[Redacted content]

End of Report

(b)(6); (b)(7)(C)

[Redacted content]



UNITED STATES POSTAL INSPECTION SERVICE

Situational Awareness Bulletin ||

Cybercrime and Analytics
LAW ENFORCEMENT SENSITIVE

Intelligence Summary

Wimkin and the Million Militia March

iCOP analysts have identified a new “uncensored social media” platform named Wimkin, which is quickly becoming a new alternative to sites like Parler and Gab.¹ The founder of Wimkin, (b)(6); (b)(7)(C) stated that the site, “was designed as a place for conservatives where they can share their opinions and what they believe to be fact without having to worry about their doing time in jail.”² The platform is found to be a hub for publicizing militia groups across the country. Moreover, iCOP analysts identified that it is also being used to promote the ‘Million Militia March’, a movement scheduled to take place in Washington, DC on January 20, 2021 aimed at preventing the Inauguration of President-Elect Joseph R. Biden.

Analysis

(b)(6); (b)(7)(C); (b)(7)(E)

[Redacted analysis content]

(b)(6); (b)(7)(C); (b)(7)(E)

[Redacted text]

UNITED STATES POSTAL INSPECTION SERVICE
Cybercrime & Analytics

(b)(6); (b)(7)(C); (b)(7)(E)

Image 2

Million Militia March

The 'Million Militia March' is a demonstration scheduled to be held in Washington, DC on January 20, 2021 "for the purpose of preventing the treasonous and illegitimate Biden and/or Harris and any other member of the Organized Crime Organization known as the Democratic Party from entering We The People's White House."⁶ The demonstration is being publicized on the social media platform Parler, but its official page has been identified on Wimkin, where currently 352 members have signed up. The page is being run by the

(b)(6); (b)(7)(C); (b)(7)(E)



Image 3

End of Report

(b)(6); (b)(7)(C); (b)(7)(E)



UNITED STATES POSTAL INSPECTION SERVICE

Situational Awareness Bulletin ||

Cybercrime and Analytics
LAW ENFORCEMENT SENSITIVE

Intelligence Summary

Nationwide Coordination of Militia Groups and Threat to Nancy Pelosi

(b)(6); (b)(3); 39 USC 410 (c)(6); (b)(7)(C); (b)(7)(E)



Analysis

(b)(6); (b)(7)(C); (b)(7)(E)



UNITED STATES POSTAL INSPECTION SERVICE

Cybercrime & Analytics

(b)(6); (b)(3); 39 USC 410 (c)(6); (b)(7)(C); (b)(7)(E)



Threat to Nancy Pelosi

(b)(6); (b)(7)(C); (b)(7)(E)



UNITED STATES POSTAL INSPECTION SERVICE

Cybercrime & Analytics

For questions regarding this report please contact

(b)(6); (b)(7)(C); (b)(7)(E)

End of Report

Attachments

(b)(6); (b)(3); 39 USC 410 (c)(6); (b)(7)(C); (b)(7)(E)

EXHIBIT A-2

GOVERNMENT MONITORING / ICOP REPORTING

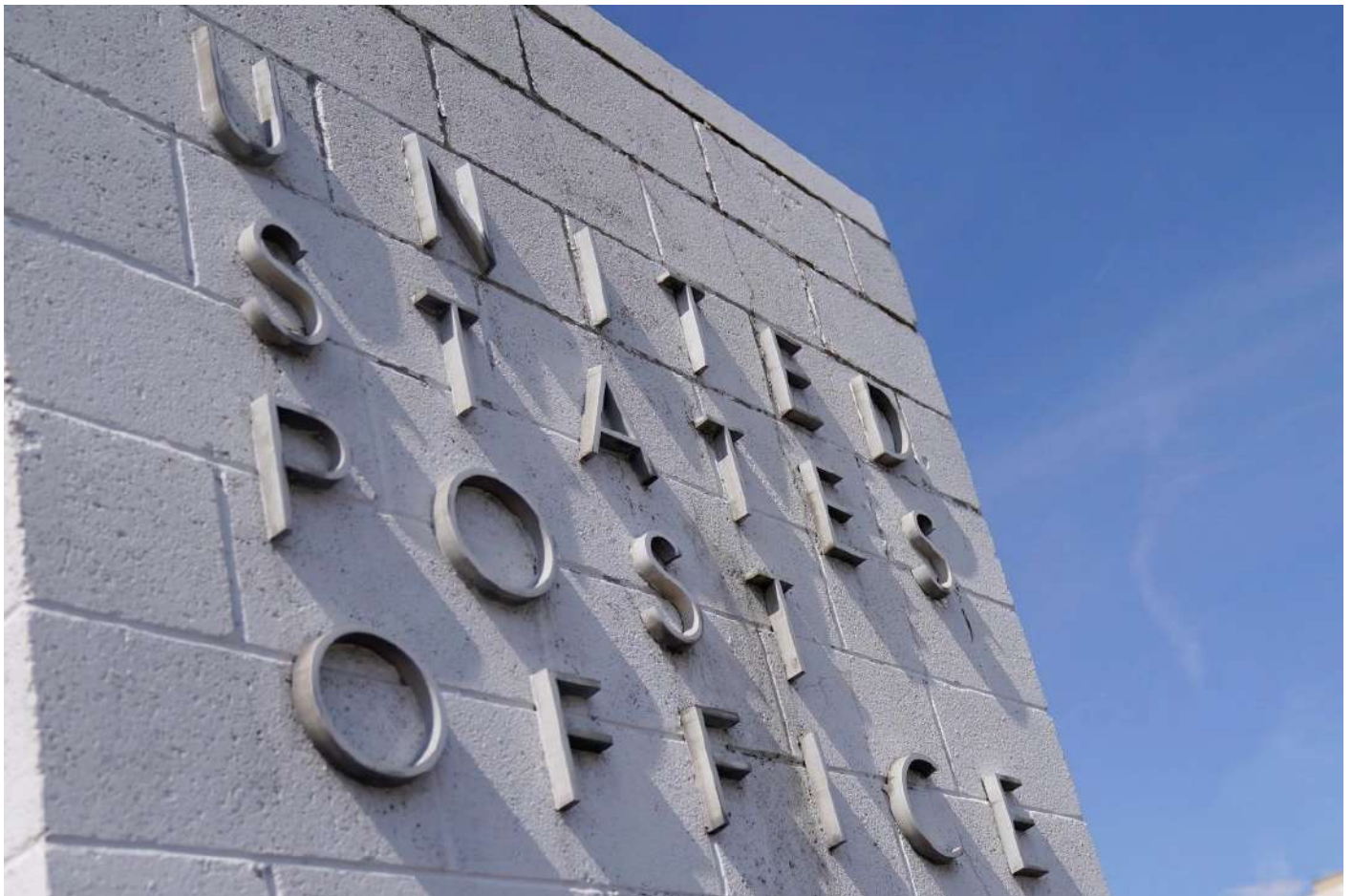
POLITICO reporting concerning Postal Inspection Service iCOP monitoring, including Wimkin references and statements that iCOP was actively monitoring Wimkin-related activity.

This cover sheet immediately precedes the exhibit identified above.

LEGAL

Covert Postal Service unit probed Jan. 6 social media

New documents reveal the involvement of the little-known USPS Internet Covert Operations Program.



The United States Postal Inspection Service's Internet Covert Operations Program sent bulletins to law enforcement agencies around the country on how to view social media posts that had been deleted. | AP Photo/David Zalubowski

By BETSY WOODRUFF SWAN
09/27/2021 04:30 AM EDT



In the days after the Jan. 6 attack on the Capitol, an obscure arm of the U.S. Postal Service did some serious internet sleuthing.

On Jan. 11, the United States Postal Inspection Service's Internet Covert Operations Program — better known as iCOP — sent bulletins to law enforcement agencies around the country on how to view social media posts that had been deleted. It also described its scrutiny of posts on the fringe social media network Wimkin.

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Few Americans are aware that the same organization that delivers their mail also runs a robust surveillance operation rooted in an agency that dates back to the 18th century. And iCOP's involvement raises questions about how broad the mandate of the Postal Service's policing arm has grown from its stated mission of keeping mail deliverers safe.

The documents also point to potential gaps in the Jan. 6 select committee's investigation by revealing concerns about a company it is not known to be scrutinizing. And those documents point to a new challenge for law enforcement in the post-Jan. 6 era: how to track extremist organizing across a host of low-profile platforms.

Two more previously unpublished government documents reviewed by POLITICO — one of which was [reported on by ABC News](#) — reveal more

concerns those efforts generate among civil liberties advocates. [Property of the People](#), a watchdog group focused on national security, obtained the documents through open records requests as part of its investigation of the Jan. 6 attack. The group has also obtained records showing that hundreds of law enforcement officers [planned ahead](#) in case Jan. 6 became a mass casualty event, and that an FBI bomb analyst [warned her coworkers](#) that #StopTheSteal could turn violent.

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Both iCOP bulletins are dated Jan. 11. They circulated through law enforcement circles, including to intelligence-sharing hubs called fusion

centers that connect federal agencies with their state and local partners. [One of the reports](#) highlights tweets from two users about Jan. 6.

One of the tweets, from Czech Republic-based company Intelligence X, announced the creation of a system for people to share pictures and videos from the Capitol attack. Another tweet, from an account called “@donk_enby,” says it includes a link to every Parler post made during the riot.

Accessing those Parler posts was a focus for law enforcement, since the Jan. 6 attackers had extensive discussions on the platform before the attack about engaging in violence that day. But — as the iCOP bulletin noted — major tech companies stopped providing services to Parler in the wake of the attack because of violent content. As a result, the social network went offline.

The iCOP bulletin implied that the disappearance of all those posts could create a hurdle for law enforcement efforts to prevent future violence — and that the archive created by “@donk_enby” could be a useful resource.

“Although Parler is currently inactive and inaccessible, efforts fronted by ‘@donk_enby’, Intelligence X, and public contributions of data can assist law enforcement in the analysis and identification of parties involved in the US Capitol Protests,” the bulletin says. “The archived information can assist in the possible mitigation of future violent protests.”

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Peter Kleissner, the CEO of Intelligence X, said he wasn't aware the Postal Service had circulated information about his archive.

“Our intention behind the archive is to make sure that these important pictures and videos of this event aren't lost and evidence is preserved,” he emailed. “This archive is not just important for the short-term use to hold rioters accountable, but also for the long-term for future generations.”

The [second iCOP](#) bulletin is titled “Nationwide coordination of Militia Groups and Threat to Nancy Pelosi.” It homed in on a website called [givemebass.com](#) and said a post “directly associated to the site founder [sic]” threatened House Speaker Nancy Pelosi. The bulletin included an image saying “DEMAND PELOSI BE EXECUTED SHE TRIED TO COME BETWEEN OUR POTUS THE NUCLEAR CODES [sic].”

The Postal Service bulletin raised concerns that someone was using [givemebass.com](#) to coordinate national militias.

“The Wimkin account ‘Vik Freeman’ has been promoting the website ‘givemebass[.]com’ as a portal for communication and coordination which has been posted to multiple militia pages on Wimkin,” the bulletin reads.

The bulletin added that iCOP analysts were “actively monitoring the website and Wimkin account” for new posts. It included information about who it believed had registered givemebass.com and when, along with details about its reach across other Wimkin pages. Wimkin bills itself as “The World’s Only Free Speech Social Media Platform,” but its [terms of service](#) say posts on the platform cannot contain “nudity, pornographic materials including cartoons, and cannot be threatening nor criminally harassing in any way shape or form.”

Advertisement

AD

Chip Gibbons, the policy director of Defending Rights & Dissent, said the document points to the growing overlap between intelligence-gathering and law enforcement work — especially since the connection between the Jan. 6 attacks and the postal service appears to be tenuous at best.

“Law enforcement-intelligence apparatuses raise serious Constitutional questions, serious questions for our democracy,” he said. “It is outside their jurisdiction as I understand it.”

“The FBI has jurisdiction over domestic terrorism, whereas the Post Office — I don’t even know how they’re involved in this,” he added.

WATCH: THE CONVERSATION



Reza Pahlavi on Trump, Iran and whether the regime will ever fall

A spokesperson for the U.S. Postal Inspection Service said the agency reviews public social media posts as part of “a comprehensive security

“News report and social media listening activity helps protect the 644,000 men and women who work for the Postal Service by ensuring they are able to avoid potentially volatile situations while working to process and deliver the nation’s mail every day,” the spokesperson said.

The USPS’s covert operations program drew attention in April when [Yahoo! reported on a bulletin](#) it sent out in March about anti-lockdown and anti-5G protests. That bulletin, which cited social media posts, generated concerns on Capitol Hill. Members of the House Oversight Committee called on the Postal Service’s inspector general to probe the program and see if analysts there engaged in illegal surveillance, as [Yahoo! also reported](#).

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AD

These new materials, along with two other documents, highlight the growing complexity of that work. [A March 29 report](#) from the Department of Homeland Security’s Office of Intelligence and Analysis said militia violent extremists are “actively disguising their online social media outreach” to promote violence, find fellow violent extremists and share tactics.

“In 2020, MVEs used or expressed interest in using a variety of more secure and often encrypted messaging applications — including Zello, Telegram, Signal, and Threema — to discuss operational activity, according to FBI and open source reporting,” the DHS report reads.

The report also said that social media companies focus on “overt threats of violence” when removing content. It added that if U.S. government officials worked with the private sector to develop indicators of “operational planning and recruitment,” it would help those companies understand how militia extremists skirted their terms of service. The report also said such engagement could help U.S. officials detect and disrupt extremists’ efforts.

The DHS report also references FBI reporting about posts that militia extremists made on social media in the months before the Jan. 6 attack. It specifically notes FBI reporting about posts that went up in July, August and October of 2020. After the Jan. 6 attack, FBI Director Chris Wray fielded multiple questions at congressional hearings about the FBI’s social media monitoring, [as Lawfare has detailed](#). He and others have signaled that the FBI’s internal rules about monitoring social media contributed to their failure to predict the violence.

AD

“We’re not allowed to ... just sit and monitor social media and look at one person’s posts ... just in case,” he said in one hearing.

But the DHS report indicates that the FBI has collected information that militia extremists posted in the months leading up to the Jan. 6 attack. This is notable since militia extremists were among those who attacked the Capitol. The DHS report does not say if the FBI collected these months-old social media posts before or after Jan. 6, and it does not say how the posts came to the FBI’s attention.

Mike German, a fellow at the Brennan Center for Justice and a former FBI agent focused on domestic terrorism, said he believes FBI counterterrorism efforts over-emphasize social media.

“A lot of people online say things that are really scary, and if law

much of this violence that occurs on the streets is unpoliced, because they're spending their resources searching out bad words online," he said.

German said he thinks the FBI should focus more of its resources on investigating violent crimes committed by far-right extremists, rather than trying to predict which ones will turn violent based on their social media posts.

And those social media posts are still plentiful, despite the efforts by the biggest mainstream social media companies to purge extremist content. According to [a Jan. 15 report from the Central Florida Intelligence Exchange](#), an intelligence-sharing hub, domestic extremists migrated to alternative platforms after Jan. 6.

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“In an effort to avoid censorship and maintain their online presence, DVEs of varying ideologies began migrating to existing alternative platforms such as MeWe, Telegram, Gab, Clouthub, Minds, and TikTok,” the Florida report reads. “Popular message boards such as 4chan and 8kun also experienced an increase in users.”

The same report said people linked to the Boogaloo movement — a loosely organized movement of anti-government extremists who believe a civil war is near — “began migrating to alternative platforms, and can currently be found on Telegram, MeWe, Minds, and TikTok.” That migration came after social media networks began removing Boogaloo content in the wake of the arrests of multiple people linked to the movement. The report noted that the number of Boogaloo hashtags and accounts on Twitter was growing, and that Boogaloo-related accounts were still active on TikTok, though “more difficult to locate due to being shadowbanned.”

The report added detail on shadowbanning: “When a channel is shadowbanned, the content is blocked and a name and/or hashtag search will bring back no results,” it read. “The shadowbanning has no effect on subscribers of the channel. Additionally, new users are still able to locate and join these channels by clicking hashtags shared by other TikTok users they have subscribed to.”

A TikTok spokesperson said the platform removes Boogaloo accounts when it identifies them.

FILED UNDER:

SOCIAL MEDIA, POSTAL SERVICE, VIOLENT EXTREMISM, COUNTERING VIOLENT EXTREMISM, LEGAL, JAN. 6 CAPITOL RIOT, INSURRECTION FALLOUT

EXHIBIT A-3

GOVERNMENT MONITORING / ICOP REPORTING

CREW reporting concerning USPS iCOP monitoring, law-enforcement circulation, and references to Wimkin.

This cover sheet immediately precedes the exhibit identified above.

INVESTIGATIONS Transparency

USPS law enforcement arm warned of violence on January 6

By Meghan Faulkner and Lauren White

March 18, 2022



Photo by Tyler Merbler under a Creative Commons license.

Share: [X](#) [Twitter](#) [Facebook](#)

Weeks before the attack on the Capitol, United States Postal Inspection Service (USPIS) Internet Covert Operations Program (iCOP) analysts issued a threat assessment for “a high potential for individuals to incite civil unrest” on January 6 due to a history of violence at MAGA marches, according to never before seen documents obtained by CREW via a FOIA lawsuit. In addition to the “Million MAGA March,” USPIS warned of a potentially violent “Million Militia March” which sought to stop President Biden’s

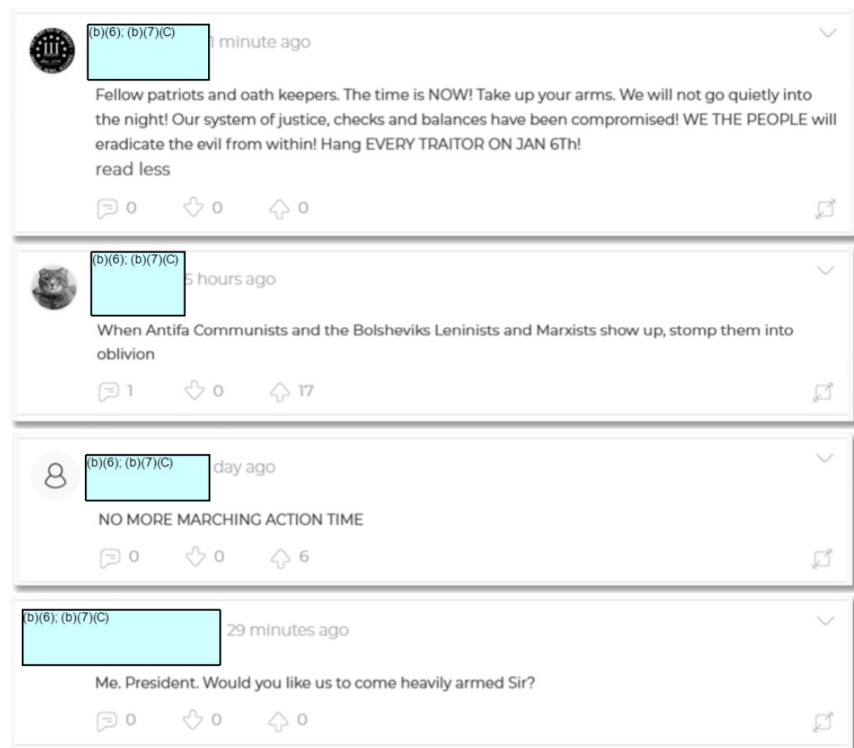
Contribute

Citing the two previous MAGA marches in November and December 2020, which both resulted in violence, a USPIS Intelligence Summary dated December 22, 2020 laid out the possible potential for civil unrest at the “Million MAGA March – Round III” on January 6, 2021.

Threat Assessment

The previous two MAGA Marches have resulted in violence, therefore analysts assess a high potential for individuals to incite civil unrest during the demonstration.

The threat assessment outlined a number of rally points where participants were planning to meet before heading to Washington, DC, as well as a number of posts on Parler in support of the march and calling for violence. The posts included in the summary had incredibly inflammatory language, including: “Hang EVERY TRAITOR ON JAN 6Th!”, “When Antifa Communists and the Bolsheviks Leninists and Marxists show up, stomp them into oblivion” and “NO MORE MARCHING ACTION TIME”.



The second USPIS Intelligence Summary, dated December 30, 2020, focuses on an “uncensored social media platform” called Wimkin, which had quickly become a “hub for publicizing militia groups.” iCOP analysts found that

Contribute

being used to organize a “Million Militia March” planned for January 20, 2021. The march’s page was being run by a user who was also the founder of a private military company, “1st Regiment of the Restored American Republic (1R3)”. “The founder and its members are *not* advocating for a peaceful demonstration,” analysts wrote. Comments on the event page included calls for violence—“there will be blood”—and members also discussed attending the Million MAGA March on January 6.

The image captures members’ comments on the event—one member went as far to state: “Unfortunately all peaceful options have been exhausted. This is war and we are engaging in conventional warfare which means anyone who stands against us is treated as an enemy combatant. There will be blood.” Additionally, some members have discussed the possibility of attending the “Million MAGA March Round III” which is taking place January 6, 2021 at the National Mall in Washington, DC.



Postal inspectors circulated both assessments far and wide. Recipients included officials at the Department of Justice, Department of Homeland Security, the FBI, US Capitol Police, Maryland and Virginia state governments, New York State troopers, the Supreme Court, the Senate, the Air Force, the Navy and even Amtrak. Yet, despite weeks of notice of serious threats of violence, many of these same agencies failed to adequately respond. CREW previously reported that Trump’s DOJ chose not to brief Congress ahead of January 6, DHS Federal Protective Services and the Secret Service downplayed warning signs of violence and Park Police was overwhelmed hours before the attack on the Capitol began. A Senate investigation similarly found evidence of poor communication and planning.

Previous reporting confirms that iCOP kept law enforcement agencies informed in the days after the attack on the Capitol, and has continued to monitor inflammatory social media posts. The assessments reviewed by CREW provide the first example of iCOP’s involvement ahead of the insurrection, and add to a disturbing reality: federal

Contribute

EXHIBIT B-1

GROWTH / APP RANKINGS

Surviving Google Play ranking screenshots showing Top 5 Trending and approximately #17 social-app ranking status before suppression.





This cover sheet immediately precedes the exhibit identified above.


EXHIBIT F-1

GOOGLE PLAY RANKING SCREENSHOTS

This exhibit contains only surviving Google Play ranking screenshots showing Wimkin's rapid-growth trajectory prior to January 2021 suppression actions.









F-1(1) — Top 5 Trending Social Application ranking.




10:00    

← **Top Charts** 

Show installed apps

free **Top grossing** **Trending** Top paid

-  **Parler**
Social
2.3★
-  **MeWe**
Social
4.2★
-  **Parlor - Social Talking App**
Social
3.4★
-  **Rumble**
Social
4.7★
-  **WIMKIN**
Social
✔ Installed
-  **USA.Life**
Social
3.4★
-  **My Liberty Page**
Social
4.0★
-  **Official Trump 2020 App**
Social
3.3★









F-1(2) — Approximately #17 ranked social application placement globally within Google Play charts.

11:20 [notifications] [share]

[back] **Top Charts** [search]

Show installed apps

Top free Top grossing Trending Top paid

- 14  **Plenty of Fish Free Dating App**
Social
✓ Installed
- 15  **Text Free: Free Text Plus Call**
Social
4.3 ★
- 16  **MeetMe: Chat & Meet New People**
Social
3.8 ★
- 17  **WIMKIN**
Social
✓ Installed
- 18  **IMVU: Virtual Life! Style, Avatar 3D, ...**
Social
4.1 ★
- 19  **YOLO: Anonymous Q&A**
Social
3.7 ★
- 20  **Official Trump 2020 App**
Social
3.3 ★
- 21  **Text Me: Text Free, Call Free, Secon...**
Social
4.1 ★

[home] [app drawer] [back]

Houseparty

EXHIBIT C-1

MAINSTREAM MEDIA

Christian Science Monitor / Associated Press article identifying post-January 6 platform pressure and naming Wimkin among smaller sites facing public and law-enforcement pressure.

This cover sheet immediately precedes the exhibit identified above.

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FIRST LOOK

Life after Twitter: Trump looks for a social media platform

Parler may be a viable platform for President Trump. But Google, Apple, and Amazon took steps to remove it from their app stores and web servers.



AP Photo/Alex Brandon, File

President Donald Trump during a roundtable with governors on June 18, 2020 at the White House. Though stripped of his Twitter account for inciting rebellion, Mr. Trump has alternative options of much smaller reach.

By Frank Bajak, Associated Press

Updated Jan. 11, 2021, 9:38 a.m. ET

BOSTON

One Twitter wag joked about lights flickering on and off at the White House being Donald Trump signaling to his followers in Morse code after Twitter and Facebook squelched the president for inciting rebellion.

Though deprived of his big online megaphones, Mr. Trump does have alternative options of much smaller reach. The far right-friendly Parler may be the leading candidate, though Google and Apple have both removed it from their app stores and Amazon decided to boot it off its web hosting service. That could knock it offline for a week, Parler's CEO said.

Mr. Trump may launch his own platform. But that won't happen overnight, and free speech experts anticipate growing pressure on all social media platforms to curb incendiary speech as Americans take stock of Wednesday's violent takeover of the United States Capitol by a Trump-incited mob.

Twitter ended Mr. Trump's nearly 12-year run on Friday. In shuttering his account it cited a tweet to his 89 million followers that he planned to skip President-elect Joe Biden's Jan. 20 inauguration that it said gave rioters license to converge on Washington once again.

Facebook and Instagram have suspended Mr. Trump at least until Inauguration Day. Twitch and Snapchat also have disabled Mr. Trump's accounts, while Shopify took down online stores affiliated with the president and Reddit removed a Trump subgroup. Twitter also banned Mr. Trump loyalists including former national security advisor Michael Flynn in a sweeping purge of accounts promoting the QAnon conspiracy theory and the Capitol insurrection. Some had hundreds of thousands of followers.

In a statement Friday, Mr. Trump said: "We have been negotiating with various other sites, and will have a big announcement soon, while we also look at the possibilities of building out our own platform in the near future."

Experts had predicted Mr. Trump might pop up on Parler, a 2-year-old magnet for the far right that claims more than 12 million users and where his sons Eric and Don Jr. are already active. Parler hit headwinds, though, on Friday as Google yanked its smartphone app from its app store for allowing postings that seek "to incite ongoing violence in the U.S." Apple followed suit on Saturday evening after giving Parler 24 hours to address complaints it was being used to "plan and facilitate yet further illegal and dangerous activities." Public safety issues will need to be resolved before it is restored, Apple said.

Amazon struck another blow Saturday, informing Parler it would need to look for a new web-hosting service effective midnight Sunday. It reminded Parler in a letter, first reported by BuzzFeed, that it had informed it in the past few weeks of 98 examples of posts "that clearly encourage and incite violence" and said the platform "poses a very real risk to public safety."

Parler CEO John Matze decried the punishments as "a coordinated attack by the tech giants to kill competition in the marketplace. We were too successful too fast," he said in a Saturday night post, saying it was possible Parler would be unavailable for up to a week "as we rebuild from scratch."

Earlier, Mr. Matze complained of being scapegoated. "Standards not applied to Twitter, Facebook, or even Apple themselves, apply to Parler." He said he "won't cave to politically motivated companies and those authoritarians who hate free speech."

Losing access to the app stores of Google and Apple – whose operating systems power hundreds of millions of smartphones – severely limits Parler's reach, though it will continue to be accessible via web browser. Losing Amazon Web Services will mean Parler needs to scramble to find another web host – in addition to the re-engineering.

Gab is another potential landing spot for Mr. Trump. But it, too, has had troubles with internet hosting. Google and Apple both booted it from their app stores in 2017 and it was left internet-homeless for a time the following year due to anti-Semitic posts attributed to the man accused of killing 11 people at a Pittsburgh synagogue. Microsoft also terminated a web-hosting contract.

Online speech experts expect social media companies led by Facebook, Twitter, and Google's YouTube to more vigorously police hate speech and incitement in the wake of the Capitol rebellion, as Western democracies led by Nazism-haunted Germany already do.

David Kaye, a University of California-Irvine law professor and former U.N. special rapporteur on free speech believes the Parlers of the world will also face pressure from the public and law enforcement as will little-known sites where further pre-inauguration disruption is now apparently being organized. They include MeWe, Wimkin, TheDonald.win, and Stormfront, according to a report released Saturday by The Alethea Group, which tracks disinformation.

Mr. Kaye rejects arguments by U.S. conservatives including the president's former U.N. ambassador, Nikki Haley, that the Trump ban savaged the First Amendment, which prohibits the government from restricting free expression. "Silencing people, not to mention the President of the US, is what happens in China not our country," Ms. Haley tweeted.

"It's not like the platforms' rules are draconian. People don't get caught in violations unless they do something clearly against the rules," said Mr. Kaye. And not just individual citizens have free speech rights. "The companies have their freedom of speech, too."

While initially arguing their need to be neutral on speech, Twitter and Facebook gradually yielded to public pressure drawing the line especially when the so-called Plandemic video emerged early in the COVID-19 pandemic urging people not to wear

masks, noted civic media professor Ethan Zuckerman of the University of Massachusetts-Amherst.

Mr. Zuckerman expects the Trump de-platforming may spur important online shifts. First, there may be an accelerated splintering of the social media world along ideological lines.

"Trump will pull a lot of audience wherever he goes," he said. That could mean more platforms with smaller, more ideologically isolated audiences.

A splintering could push people towards extremes – or make extremism less infectious, he said: Maybe people looking for a video about welding on YouTube will no longer find themselves being offered an unrelated QAnon video. Alternative media systems that are less top-down managed and more self-governing could also emerge.

Mr. Zuckerman also expects major debate about online speech regulation, including in Congress.

"I suspect you will see efforts from the right arguing that there shouldn't be regulations on acceptable speech," he said. "I think you will see arguments from the democratic side that speech is a public health issue."

This story was reported by The Associated Press. AP writers Barbara Ortutay in Oakland, California, and Amanda Seitz in Chicago contributed to this report.

EXHIBIT C-2

MAINSTREAM MEDIA

Hartford Courant / Associated Press article concerning coordinated Parler infrastructure removals, app-store loss, web-hosting disruption, and broader platform pressure referencing Wimkin.

This cover sheet immediately precedes the exhibit identified above.

SPONSORED CONTENT

Amazon, Apple remove Parler after the social network was among those used to organize US Capitol riots



OLIVIER DOULIERY/AFP via Getty Images

By **THE ASSOCIATED PRESS**

PUBLISHED: January 10, 2021 at 7:18 PM EST | UPDATED: January 11, 2021 at 5:40 PM EST

President Donald Trump has been kicked off of most mainstream social media platforms following his supporters' siege on the U.S. Capitol. But it remains to be seen how fast or where — if anywhere — on the internet he will be able to reach his followers.

The far right-friendly Parler had been the leading candidate, at least until Google and Apple removed it from their app stores and Amazon decided to boot it off its web hosting service by midnight Pacific time on Sunday.

Parler's CEO said that could knock it offline for a week, though that might prove optimistic. And even if it finds a friendlier web-hosting service, without a smartphone app, it's hard to imagine Parler gaining mainstream success.

The 2-year-old magnet for the far right claims more than 12 million users, though mobile app analytics firm Sensor Tower puts the number at 10 million worldwide, with 8 million in the U.S. That's a fraction of the 89 million followers Trump had on Twitter.

Still, Parler might be attractive to Trump since it's where his sons Eric and Don Jr. are already active. Parler hit headwinds, though, on Friday as Google yanked its smartphone app from its app store for allowing postings that seek "to incite ongoing violence in the U.S." Apple followed suit on Saturday evening after giving Parler 24 hours to address complaints it was being used to "plan and facilitate yet further illegal and dangerous activities." Public safety issues will need to be resolved before it is restored, Apple said.

A message seeking comment from Parler was sent Sunday on whether the company plans to change its policies and enforcement around these issues.

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Associated Press writers Barbara Ortutay in Oakland, California, and Amanda Seitz in Chicago contributed to this report.

Around the Web

REVCONTENT

EXHIBIT C-3

MAINSTREAM MEDIA

Media compilation associating Wimkin with January 6, app-store removals, violence concerns, extremism narratives, QAnon, militias, platform suppression, and business destruction.

This cover sheet immediately precedes the exhibit identified above.

<https://www.wsj.com/articles/google-play-suspends-wimkin-citing-posts-calling-for-violence-11611108309>

WSJ PRO

Google Play Suspends Wimkin, Citing Posts Calling for Violence

Takedown follows the removal of the small social-media network from Apple's App Store last week

By David Uberti

WSJ PRO Jan. 19, 2021 9:05 pm ET



Members of the National Guard on Tuesday near the U.S. Capitol ahead of President-elect Joe Biden's inauguration. Following the Jan. 6 riot on Capitol Hill, tech companies have been trying to moderate conspiracy theories and calls to violence on social media. PHOTO: ANDREW KELLY/REUTERS

Alphabet Inc.'s Google has removed the small social-media site Wimkin from its Google Play store, joining Apple Inc. in cutting the app's reach amid a broader effort to rein in misleading or potentially harmful content.

Google suspended Wimkin from its app store Monday night, a company spokesman said, citing posts that called for violence against liberals. The posts violated rules barring apps from hosting what Google deems inappropriate content, the spokesman said.

<https://www.wsj.com/articles/apples-app-store-removes-social-media-platform-wimkin-over-calls-to-violence-11610669305>

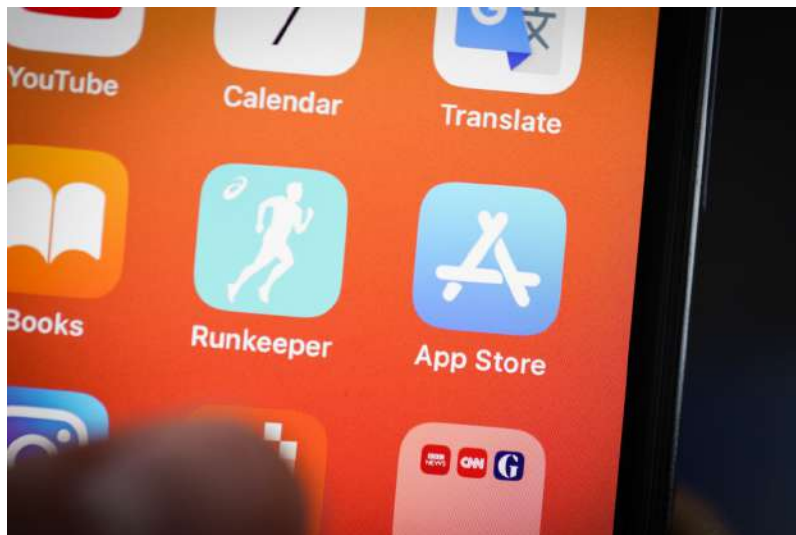
EXCLUSIVE WSJ PRO

Apple's App Store Removes Social Media Platform Wimkin Over Calls to Violence

Wimkin founder says he had removed incendiary posts before Apple ejected the platform from the App Store

By David Uberti

WSJ PRO Jan. 14, 2021 7:08 pm ET



Apple removed the Wimkin social media platform from its App Store on Tuesday, part of general move among large tech firms to limit speech that could provoke violence. PHOTO: JAAP ARRIENS/NURPHOTO/ZUMA PRESS

Apple Inc. has removed the social media platform Wimkin from its App Store, part of a widening crackdown by tech companies on potentially dangerous content during the presidential transition.

The tech giant on Tuesday suspended Wimkin, a small site that markets itself as a free-speech haven, over content that included calls for a civil war and the arrest of Vice President Mike Pence, according to Wimkin founder Jason Sheppard and records of his correspondence with Apple.

Recommended Videos

TECHNOLOGY Published January 14, 2021 10:49pm EST

Apple removes Wimkin from App Store as part of crackdown by tech companies on dangerous content during transition: WSJ

Site, which markets itself as free-speech haven, suspended over content calling for civil war, arrest of VP Pence

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By David Uberti | [The Wall Street Journal](#)

[Apple Inc.](#) has removed the social media platform Wimkin from its App Store, part of a widening crackdown by tech companies on potentially dangerous content during the presidential transition.

Stock Symbol	AAPL
Stock Name	APPLE INC.
Stock Price	299.81
Stock Change	+0.84
Change %	+0.28%

The tech giant on Tuesday suspended Wimkin, a small site that markets itself as a free-speech haven, over content that included calls for a civil war and the arrest of Vice President Mike Pence, according to Wimkin founder Jason Sheppard and records of his correspondence with Apple. [APPLE IPHONE DEMAND 'ROBUST' AHEAD OF QUARTERLY EARNINGS, ANALYST SAYS](#)

Mr. Sheppard said on Thursday that Wimkin's small team removed dozens of posts and a group attempting to organize a "Million Militia March" at President-elect [Joe Biden's](#) inauguration next week.

Apple Inc. has removed the social media platform Wimkin from its App Store, part of a widening crackdown by tech companies on potentially dangerous content during the presidential transition. (JOSH EDELSON/AFP via Getty Images)

"Once it was reported to us, we took care of it," Mr. Sheppard said.

Mr. Sheppard said the takedowns on the platform, which has 300,000 users and mimics some of the functions of Facebook, pales in comparison to content removals by much larger competitors.

"I can't fault them for looking at it," Mr. Sheppard said of Apple. "I just wish they would give us a chance."

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TECH

Wimkin's founder says his company is being treated unfairly after its app was removed by Google and Apple app stores

By [Kevin Shalvey](#)



Terraxplorer/Getty Images



Jan 24, 2021, 8:03 AM ET

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Wimkin said its users spiked about 20% after the Capitol riots, before Google removed the app.

"We do not plan to shut down," said Jason Sheppard, Wimkin's founder.

A Google spokesperson said it didn't allow apps that "depict or facilitate gratuitous violence."

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Alternative social media network Wimkin enjoyed a spike of around 20% in new users in the 12 days between the Capitol siege and Monday, when Google removed it from its app store, said its founder.

Jason Sheppard told Insider it gained about 55,000 new users, breaking the milestone of 300,000 users.

Now, after Google and Apple both removed the app, new users will have to download Wimkin directly from the company's homepage. That will make it more difficult to add users accustomed to app stores. But the social network doesn't plan to call it quits.

TikTok could be banned in US after House vote

"We do not plan to shut down," Sheppard said.

Wimkin was launched in August 2020 as a free speech social network, an alternative to larger sites like Twitter and Facebook.

Some users who've been banned or suspended from larger social networks have found new audiences on smaller alternative networks. Parler, for example, shot to the top of the app store after the Capitol siege.

Apple and Google removed both Parler, which went dark when it was also removed from its web host, Amazon Web Services. Parler's website came back online this week.

For Wimkin, Apple and Google each cited a lack of moderation for dangerous content, according to messages shared by the company.

A Google spokesperson told Insider: "We don't allow apps that depict or facilitate gratuitous violence or other dangerous activities."

Read more: [How Silicon Valley banished Donald Trump in 48 hours](#)

Wimkin said Google and Apple sent it nine screenshots – four from Google and five from Apple – as part of a back-and-forth exchange over Wimkin's moderation.

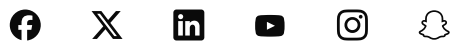
In those screenshots, shared with Insider, one user called for a militia to form in Washington on January 6. Others featured general violent rhetoric. One post, which was accompanied by a picture of President Donald Trump, read: "Its time for all Patriots to prepare for a possible armed conflict with the treasonous individual's who are trying to destroy our country."

Like Parler, Wimkin increased its moderation efforts after Google and Apple sought changes. The company increased its moderation team from four to eight people, it said. That was more than enough "to police content," said Sheppard.

It also said it was increasing word-banning filters, adding Google Vision, an image-recognition system, and making other updates. Still, Sheppard said he was notified of Google's removal decision Monday evening.

"We're being treated entirely unfairly and if we aren't reinstated when we've worked tirelessly to comply and become a better platform, we will be seeking legal remedy to at the very least, shed some light into this tyrannical monopoly," Sheppard said via email.

AD



NEWS

Apple App Store boots social media app Wimkin over user calls for violence [u]



Mike Peterson



Fri Jan 15 2021, 10:05 AM EST · 3 minute read



Credit: Wimkin

content.

Apple removed Wimkin, which bills itself as an "uncensored" platform for free speech, because of content that called for violence ahead of the inauguration of President-elect Joe Biden, *The Wall Street Journal* **reported** Friday. According to Wimkin founder Jason Sheppard, Apple pulled the platform because of posts related to the organization of a "Million Militia March" at the inauguration on Jan. 20.

Other posts flagged as potentially dangerous included ones that called for the arrest of Vice President Mike Pence or a second civil war.

Sheppard told *The Wall Street Journal* that his moderation team at Wimkin "took care" of the posts once they were reported to them. The platform founder said his moderators aren't there to fact-check, but instead there to "keep people safe."

The Wimkin team is adding additional moderation measures, including tools that automatically flag words like "murder" or "killing." Apple's App Review Board told Sheppard that those measures as they stand at present fail to satisfy its guidelines.

"I can't fault them for looking at it," Sheppard said of Apple's scrutiny of the content. "I just wish they would give us a chance."

Sheppard said he is working with Apple officials on ways that the platform can add additional security measures and return to the App Store.

Wimkin joins other platforms that have been pulled from the App Store and other services since the Jan. 6 storming of the U.S. Capitol. On Jan. 10, Apple **pulled** social media site Parler, known for its fringe and far-right user base, from the app marketplace because it didn't meet content moderation guidelines. Google also pulled the platform, as did Amazon Web Services



In the case of Parler, Apple pulled the app because it was used to "plan, coordinate, and facilitate" the violent events at the deadly Capitol siege. According to Apple, the platform enabled users to storm the Capitol building, which led to "loss of life, numerous injuries, and the destruction of property."

As with Wimkin, Apple **notes** that Parler can return to the App Store if it implements stronger content moderation features.

Wimkin is still available to iOS and Android users through a web browser.

Update January 15, 2:30 PM Eastern Time: Wimkin founder Jason Sheppard has clarified that the app was not removed from the Google Play store.

"We live in unprecedented times where America is feeling angst, fear and distrust like never before. We also are slaves to technology where sometimes the two combined cause a sense of urgency that lead to legitimate errors that are non-purposeful," Sheppard said to *AppleInsider* after some discussions on Saturday.

"We are working with both Apple to regain 'Ready for Sale' status and provided them a 34 page plan, as well as Google Play whom has not removed us. This is for the safety of

Update January 19, 11:04 AM Eastern Time: Google has removed Wimkin from the Google Play store. In correspondence to *AppleInsider*, Sheppard clarified what he has provided to both Apple and Google.

"At 8:25 PM EST on 1/18, I received an email that Google Play (GP) was removing Wimkin from the GP store," Wrote Sheppard. "We had earlier provided both Apple and [Google] 43 pages of documents and screenshots from our content moderation system and a comprehensive plan on how to better moderate content."

According to Sheppard, Specific plans for Wimkin include:

- Four more content moderators.
- Google Vision for red flagging and image recognition
- Permissions for any moderator to delete any post, profile, group, page or any other content that goes against our policies
- Post reporting by users
- Specific word bans
- Changes to group and page creation to require approval by Wimkin prior to the group or page displaying live
- Addition of a notification that's sent to all moderators so live streams can be monitored in real-time



Mike Peterson

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Tech

Wimkin: Google joins Apple in banning app described as 'the next Parler'

QAnon conspiracy theorists and right wing users are once again thwarted in their efforts to regroup online following Big Tech bans



Anthony Cuthbertson

Thursday 21 January 2021 09:54 EST

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 Wimkin (AFP via Getty Images) 

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Google has joined **Apple** by banning yet another social media app popular with far right users from its app store.

Wimkin, which describes itself as “100% uncensored social media”, had risen in popularity in recent weeks following a crackdown by more mainstream platforms like Facebook and Twitter against far right users accused of spreading conspiracy theories and inciting violence.



A Google spokesperson said Wimkin was removed from the Play Store due to posts calling for violence against liberals.

“We don’t allow apps that depict or facilitate gratuitous violence or other dangerous activities,” the spokesperson said.

It is the latest action from a Big Tech firm aimed at combating harmful content online in the wake of the violent insurrection at the US Capitol on 6 January, which left five people dead.

RECOMMENDED

➤ [WhatsApp exodus is ‘largest digital migration in human history’](#)

The event was planned on social media apps by pro-Trump supporters in the two months leading up to the riots, with Twitter users and groups on Facebook promoting false claims about the integrity of the US election.

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The mass banning of Facebook and Twitter users who pushed misleading content, including Donald Trump's accounts, saw many people migrate to fringe apps like

Apple and Google both banned Parler earlier this month and have now taken action against the lesser-known Wimkin app, which has roughly 300,000 users according to *The Wall Street Journal*.

Wimkin, became a haven for adherents to the **QAnon conspiracy theory**, prompting one tech commentator to describe it as “**the next Parler**”.

A message on Wimkin’s website following the Google ban stated: “We are working on getting back in both Apple Store and Google Play. Thank You.”

According to the site’s Terms and Conditions, users are requested to comply with “acceptable use standards”, but adds that moderation of the platform only takes place “during normal business hours (9am-9pm EST)”.

These standards appear to be similar to Parler’s, in that they forbid nudity and pornographic materials. “Criminally harassing” contributions are also not allowed, though there appears to be **no restrictions on content that is intended to mislead or incite violence**.

More about: [Google](#) [Apple](#) [Parler](#)



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TECH

Wimkin, a free speech network, says it was hit with a 'massive' DDoS attack after being banned from Apple's App Store

By [Kevin Shalvey](#)



Erin Scott/Reuters



Jan 15, 2021, 7:35 AM ET

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Apple removed Wimkin, a free-speech social network, from their app stores, as [The Wall Street Journal](#) first reported.

On its website, Wimkin posted a notice, saying "a massive DDOS attack attempt came in" after the removals.

At least one group on the network had repeatedly called for an armed militia to form in Washington during President-elect Joe Biden's inauguration.

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Wimkin, a free-speech social media network, said it was hit with a "massive" attack by hackers after Apple removed the app from its store.

On Tuesday, Wimkin had been removed from Apple's App Store for not moderating violent content, including some users calling for a civil war, as The Wall Street Journal first reported. Google planned to remove the app early Friday morning, according to Wimkin. As of Saturday, the network was still available on Google.

On its website, Wimkin posted a notice, saying "a massive DDOS attack attempt came in" after the removals were announced. In the last week, additional DDOS attacks had disrupted the network, and disabled the Wimkin app, the company said in a Facebook post.



TikTok could be banned in US after House vote

"We are placing the site in maintenance mode while we combat such. Please check back shortly. We'll announce when back online. Thank you for your patience and support. Thank you,"

With about 300,000 users, Wimkin is relatively small. Its design mimics Facebook's pages and posts. Its founder Jason Sheppard said on LinkedIn that his network "does not censor its users for anything but criminal activity and allows free speech with no fact checking."

In a statement to Insider, Sheppard said his company has been working with Apple to get the app restored. "We live in unprecedented times where America is feeling angst, fear and distrust like never before. We also are slaves to technology where sometimes the two combined cause a sense of urgency that lead to legitimate errors that are non-purposeful. We are working with both Apple to regain "Ready for Sale" status and provided them a 34 page plan, as well as Google Play whom has not removed us. This is for the safety of our platform users and not for any censorship. Free speech will not be affected. Wimkin only censors nudity, pornography, and criminal activity, including threats of harm or violence."

Last week, Apple and Google both removed Parler, a larger free speech social network. As violent mobs ransacked the hallways of Congress on Wednesday, a chorus of Parler users called for violence. Parler went offline on Sunday night, as Amazon removed it from its web hosting service.

[Read more: Parler should be taken seriously as a hotbed of extremism and conspiracy theories, a new study shows](#)

Both Parler and Wimkin said they're dedicated to free speech. They had welcomed users who were removed from Twitter or Facebook for supporting QAnon, using violent rhetoric, or other policy violations. Parler had been the top download on the App Store before its removal last week.

In recent months, Wimkin users had posted about marching on Washington in January. At least one group on the network had repeatedly called for an armed militia to form in Washington during President-elect Joe Biden's inauguration.

"Millions of American Militia will meet in Washington DC, on January 20, 2021 for the purpose of preventing any attempt by the treasonous domestic enemy Joe Biden, or any other member of the Communist Organized Crime Organization known as The Democratic Party, from entering the White House belonging to We The People," said a post on one group's page, as captured by the Internet Archive's [Wayback Machine](#).

Some posts and users who had incited violence were removed after Apple notified the app, Sheppard told The Wall Street Journal.

Apple said it had received complaints that Wimkin was "used to plan and facilitate illegal and dangerous activities on January 20th," according to Wimkin, which posted its conversation with Apple on its Facebook page.

Apple did not respond to a request for comment. "We have determined that Wimkin does not have sufficient user generated content precautions in place to protect the health and safety of users," an App Store representative said, according to Wimkin.

Correction: A previous version of this story reported that Wimkin had been removed from the Google Play store. Google had issued a warning but did not remove the app.

AD

EXHIBIT D-1

APP STORE ENFORCEMENT

Google Play Enforcement Notice - January 14, 2021.

This cover sheet immediately precedes the exhibit identified above.



Action Required: Your app is not compliant with Google Play Policies (WIMKIN - 100% Free Speech, Uncensored Social Media)

1 message

Google Play Support <no-reply-googleplay-developer@google.com>
Reply-to: no-reply-googleplay-developer@google.com
To: jcsheppard2019@gmail.com
Cc: jsheppard@dreamteamwebdesign.com

Thu, Jan 14, 2021 at 4:23 AM





Developer update



Hi Developers at Jason Sheppard,

After a recent review, we found that your app WIMKIN - 100% Free Speech, Uncensored Social Media ([app.wimkin.android](https://play.google.com/store/apps/details?id=com.wimkin)) is not compliant with one or more of our Developer Program Policies. Please resolve the issue within 24 hours of the issuance of this notification or your app will be removed from Google Play.

	<h3>Issue with your app</h3> <p>Your app contains content that doesn't comply with the User Generated Content (UGC) policy.</p> <p>Please see the example screenshots attached.</p>
	<h3>About the User Generated Content (UGC) policy</h3> <p>Apps that contain or feature UGC must:</p> <ul style="list-style-type: none">• Define objectionable content and behaviors in a way that complies with Play's Developer Program Policies—including the policies noted below—and prohibit them in the app's terms of use or user policies;• Implement robust, effective and ongoing UGC moderation, as is reasonable and consistent with the type of UGC hosted by the app<ul style="list-style-type: none">◦ In the case of live-streaming apps, objectionable UGC must be removed as close to real-time as reasonably possible. <h4>Other Relevant Developer Program Policies</h4> <ul style="list-style-type: none">• Inappropriate Content > Violence: We don't allow apps that depict or facilitate gratuitous violence or other dangerous activities. We don't allow apps with content related to terrorism, such as content that promotes terrorist acts, incites violence, or celebrates terrorist attacks.• Deceptive Behavior > Misleading claims: We don't allow apps that contain false or misleading information or claims, including in the description, title, icon, and screenshots.

Action required: Publish a compliant version of your app within 24 hours.

Here's what to do to help get your app back on Google Play:

1. Read through the [User Generated Content](#), [Violence](#), and [Misleading Claims](#) policies for more details.
2. If it's possible to bring your app into compliance, make appropriate changes to your app. In addition to addressing the issue identified above, you may also want to check your app's store listing for compliance, if applicable.
3. Double check that your app is compliant with all other [Developer Program Policies](#).
4. Sign in to your [Play Console](#) and upload the modified, policy compliant APK. Make sure to increment the version number of the APK.

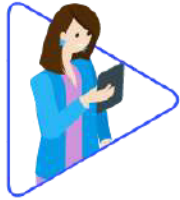
Contact support

If you've reviewed the policy and feel our decision may have been in error, please reach out to our [policy support team](#). We'll get back to you within 2 business days.

Thanks for your continued support in helping to make Google Play a positive experience for both developers and consumers.

Please complete a [two question survey](#) to help us improve this experience.

The Google Play Team



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You have received this mandatory email service announcement to update you about important changes to your Google Play Developer account.

6 attachments







-  **20210114_011952_669_PST.png**
203 KB
-  **20210114_012058_285_PST.png**
466 KB
-  **20210114_012006_036_PST.png**
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264 KB
-  **20210114_012215_556_PST.png**
621 KB
-  **20210114_011937_335_PST.png**
292 KB

EXHIBIT D-2

APP STORE ENFORCEMENT

Google Play Enforcement Notice - January 15, 2021.

This cover sheet immediately precedes the exhibit identified above.



Action Required: Your app is not compliant with Google Play Policies (WIMKIN - 100% Free Speech, Uncensored Social Media)

1 message

Google Play Support <no-reply-googleplay-developer@google.com>
Reply-to: no-reply-googleplay-developer@google.com
To: jcsheppard2019@gmail.com
Cc: jsheppard@dreamteamwebdesign.com

Fri, Jan 15, 2021 at 4:24 PM





Developer update



Hi Developers at Jason Sheppard,

After a recent review, we found that your app WIMKIN - 100% Free Speech, Uncensored Social Media ([app.wimkin.android](https://play.google.com/store/apps/details?id=com.wimkin)) is not compliant with one or more of our Developer Program Policies. Please resolve the issue within 24 hours of the issuance of this notification or your app will be removed from Google Play.

	<p>Issue with your app</p> <p>Your app contains content that doesn't comply with the User Generated Content (UGC) policy. Please see the example screenshots attached.</p>
	<p>About the User Generated Content (UGC) policy</p> <p>Apps that contain or feature UGC must:</p> <ul style="list-style-type: none">• Define objectionable content and behaviors in a way that complies with Play's Developer Program Policies—including the policies noted below—and prohibit them in the app's terms of use or user policies;• Implement robust, effective and ongoing UGC moderation, as is reasonable and consistent with the type of UGC hosted by the app<ul style="list-style-type: none">◦ In the case of live-streaming apps, objectionable UGC must be removed as close to real-time as reasonably possible. <p>Other Relevant Developer Program Policies</p> <p>- Inappropriate Content > Violence: We don't allow apps that depict or facilitate gratuitous violence or other dangerous activities. We don't allow apps with content related to terrorism, such as content that promotes terrorist acts, incites violence, or celebrates terrorist attacks.</p>

Action required: Publish a compliant version of your app within 24 hours

Here's what to do to prevent your app from being removed from Google Play:

1. Read through the [User Generated Content](#) and [Violence](#) policies for more details.
2. If it's possible to bring your app into compliance, make appropriate changes to your app. In addition to addressing the issue identified above, you may also want to check your app's store listing for compliance, if applicable.
3. Double check that your app is compliant with all other [Developer Program Policies](#).
4. Sign in to your Play Console and upload the modified, policy compliant APK. Make sure to increment the version number of the APK.

Contact support

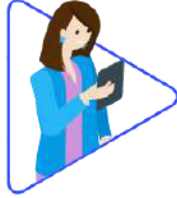
If you've reviewed the policy and feel our decision may have been in error, please reach out to our [policy support team](#). We'll get back to you within 2 business days.

Thanks for your continued support in helping to make Google Play a positive experience for both developers

and consumers. We look forward to seeing an updated version of your app on Google Play.

Please help us improve the developer experience by completing this [two question survey](#).

The Google Play Team



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-  **20210115_124925_601_PST.png**
261 KB
-  **20210115_125009_519_PST.png**
365 KB
-  **20210115_124947_946_PST.png**
645 KB

EXHIBIT D-3

APP STORE ENFORCEMENT

Google Play Enforcement Notice - January 17, 2021.

This cover sheet immediately precedes the exhibit identified above.



Action Required: Your app is not compliant with Google Play Policies (WIMKIN - 100% Free Speech, Uncensored Social Media)

1 message

Google Play Support <no-reply-googleplay-developer@google.com>
Reply-to: no-reply-googleplay-developer@google.com
To: jcsheppard2019@gmail.com
Cc: jsheppard@dreamteamwebdesign.com

Sun, Jan 17, 2021 at 7:02 PM



Developer update



Hi Developers at Jason Sheppard,

After a recent review, we found that your app WIMKIN - 100% Free Speech, Uncensored Social Media ([app.wimkin.android](https://play.google.com/store/apps/details?id=app.wimkin.android)) is not compliant with one or more of our Developer Program Policies. Please resolve the issue within 24 hours of the issuance of this notification or your app will be removed from Google Play.



Issue with your app

Your app contains content that doesn't comply with the User Generated Content (UGC) policy.

Please see the example screenshots attached.



About the User Generated Content (UGC) policy

Apps that contain or feature UGC must:

- Define objectionable content and behaviors in a way that complies with Play's Developer Program Policies—including the policies noted below—and prohibit them in the app's terms of use or user policies;
- Implement robust, effective and ongoing UGC moderation, as is reasonable and consistent with the type of UGC hosted by the app
 - In the case of live-streaming apps, objectionable UGC must be removed as close to real-time as reasonably possible.
- Other Relevant Developer Program Policies
- **Inappropriate Content > Violence:** We don't allow apps that depict or facilitate gratuitous violence or other dangerous activities. We don't allow apps with content related to terrorism, such as content that promotes terrorist acts, incites violence, or celebrates terrorist attacks.

Action required: Publish a compliant version of your app within 24 hours.

Here's what to do to help get your app back on Google Play:

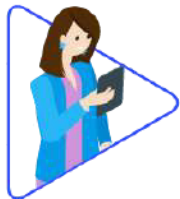
1. Read through the [User Generated Content](#) policy for more details.
2. If it's possible to bring your app into compliance, make appropriate changes to your app. In addition to addressing the issue identified above, you may also want to check your app's store listing for compliance, if applicable.
3. Double check that your app is compliant with all other [Developer Program Policies](#).
4. Sign in to your Play Console and upload the modified, policy compliant APK. Make sure to increment the version number of the APK.

Contact support

If you've reviewed the policy and feel our decision may have been in error, please reach out to our [policy support team](#). We'll get back to you within 2 business days.

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3 attachments

 **20210117_150833_324_PST.png**
234 KB

 **20210117_150814_552_PST.png**
210 KB


 **20210117_150903_677_PST.png**
373 KB

EXHIBIT E-1

MONETIZATION - ADMOB

AdMob earnings records and January 19, 2021 ad-serving disablement evidence.

This cover sheet immediately precedes the exhibit identified above.



Payments profile ID
9547-7985-5712

Name
Jason sheppard

Payments account nickname
AdSense pub-8599106580935309

Summary created
Jun 9, 2021

Oct 1 – 31, 2020

Ending balance: \$2,096.88

Date	Description	Amount (USD)
Oct 1 – 31, 2020	Invalid Traffic - AdMob Applications - AdWords Ads	-\$3.93
Oct 1 – 31, 2020	Earnings - AdMob Applications - AdWords Ads	\$2,100.81
Oct 21, 2020	Automatic payment: Business ••••920. 091000013216714. ADSENSE:5314691930	-\$1,272.91
		Starting balance: \$1,272.91



Payments profile ID

9547-7985-5712

Name

Jason sheppard

Payments account nickname

AdSense pub-8599106580935309

Summary created

Jun 9, 2021

Sep 1 – 30, 2020

Ending balance: \$1,272.91

Date	Description	Amount (USD)
Sep 1 – 30, 2020	Invalid Traffic - AdMob Applications - AdWords Ads	-\$1.64
Sep 1 – 30, 2020	Earnings - AdMob Applications - AdWords Ads	\$1,274.55

Starting balance: \$0.00



Your AdSense application status

1 message

Google AdSense <adsense-noreply@google.com>
Reply-to: Google AdSense <adsense-noreply@google.com>
To: jcsheppard2019@gmail.com

Fri, Jan 8, 2021 at 1:25 AM



Your Publisher ID: pub-8599106580935309

Your application status

Thank you for your interest in AdSense. After reviewing your application, our specialists have found that it does not meet our program criteria. Therefore, we are unable to accept you into our program.

Our AdSense [program policies](#) are designed to ensure the effectiveness of Google ads for our publishers as well as for our advertisers. We review all publishers and we reserve the right to decline any application. If you are able to make changes to meet our program criteria, you may reapply for AdSense in the future.

Please note that we may not be able to respond to inquiries regarding the specific reasons for our decision. Thank you for your understanding.

Thanks,
The Google AdSense Team

Google LLC 1600 Amphitheatre Parkway, Mountain View, CA 94043

You have received this mandatory email service announcement to update you about important changes to your AdSense product or account.



Google AdMob ad serving has been disabled to your app

3 messages

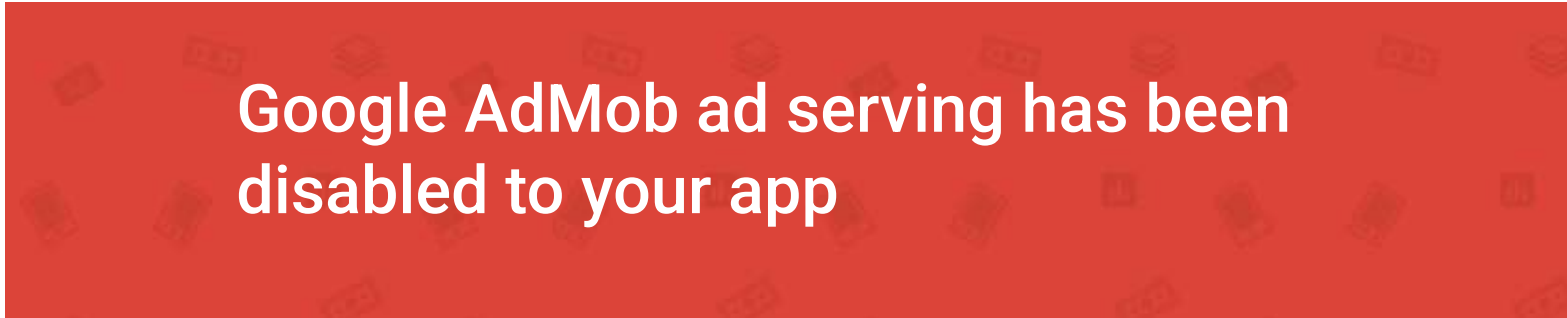
Google AdMob <admob-noreply@google.com>
Reply-to: Google AdMob <admob-noreply@google.com>
To: jcsheppard2019@gmail.com

Tue, Jan 19, 2021 at 3:56 AM

This email is to alert you that one of your applications is not currently in compliance with our AdMob program policies and as a result, **ad serving has been disabled to your application.** [View in policy center](#)



Your Publisher ID: pub-8599106580935309 [Sign In](#)



Here are some details

App Id: 1526089951

Action required: If you have modified your app to be in compliance with our policies or you feel this violation is in error, please visit the [AdMob Policy Center](#) to view this violation and request a re-review.

We suggest that you take the time to review the rest of your applications to ensure that they're in compliance with our policies and help reduce the likelihood of future policy emails from us. Additionally, please note that our team reserves the right to disable accounts at any time if we continue to see violations occurring.

[View in policy center](#)

Sincerely,

The Google AdMob Team

Was this email helpful?

You have received this mandatory email service announcement to update you about important changes to your AdMob account.



© 2021 Google LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

Google AdMob <admob-noreply@google.com>
Reply-to: Google AdMob <admob-noreply@google.com>
To: jcsheppard2019@gmail.com

Tue, Jan 19, 2021 at 4:02 AM

This email is to alert you that one of your applications is not currently in compliance with our AdMob program policies and as a result, **ad serving has been disabled to your application.** [View in policy center](#)



Your Publisher ID: pub-8599106580935309 [Sign In](#)

Google AdMob ad serving has been disabled to your app

Here are some details

App Id: [app.wimkin.android](#)

Action required: If you have modified your app to be in compliance with our policies or you feel this violation is in error, please visit the [AdMob Policy Center](#) to view this violation and request a re-review.

We suggest that you take the time to review the rest of your applications to ensure that they're in compliance with our policies and help reduce the likelihood of future policy emails from us. Additionally, please note that our team reserves the right to disable accounts at any time if we continue to see violations occurring.

[View in policy center](#)

Sincerely,

The Google AdMob Team

Was this email helpful?

Yes

No

You have received this mandatory email service announcement to update you about important changes to your AdMob account.

Google™

© 2021 Google LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

Jason Sheppard <jcsheppard2019@gmail.com>
To: david.uberti@wsj.com

Tue, Jan 19, 2021 at 7:13 PM

[Quoted text hidden]

EXHIBIT F-1

MONETIZATION - PAYPAL

PayPal limitation notices, API disruption, subscription impairment, and payment-processing disruption evidence.

This cover sheet immediately precedes the exhibit identified above.

DreamTeam Development

PayPal Account: jsheppard@wrightroadproductions.com

(Amounts in USD)

Balance	Beginning	Ending
Total balance	0.00	881.22
Available balance	0.00	881.22
Payables balance	0.00	0.00

Activity	Debit	Credit
Sales activity	--	118,364.49
Payments received	0.00	118,804.32
Disbursements received	0.00	0.00
Refunds sent	-439.83	0.00
Fees	-3,652.32	--
Payment fees	-3,181.15	0.00
Refunded fees	0.00	5.16
Chargeback fees	-140.00	0.00
Dispute Fees	0.00	0.00
Account fees invoice	0.00	0.00
Other fees	-337.23	0.90
Dispute activity	-444.29	--
Chargebacks & disputes	-1,488.52	88.99
Dispute reimbursements	0.00	955.24
Transfers & withdrawals	-66,237.15	--
Currency Transfers	-7,777.86	1,915.99
Transfers to PayPal account	0.00	17,583.54
Transfers from PayPal account	-77,958.82	0.00
Purchase activity	-47,134.30	--
Online payments sent	-50,233.65	0.00
Refunds received	0.00	3,099.35



Activity	Debit	Credit
Debit card purchases	0.00	0.00
Debit card returns	0.00	0.00
Reserves & releases	0.00	--
Reserve holds	0.00	0.00
Reserve releases	0.00	0.00
Payment review holds	0.00	0.00
Payment review releases	0.00	0.00
Payment holds	0.00	0.00
Payment releases	0.00	0.00
Gift Certificate purchases	0.00	0.00
Gift Certificate redemption	0.00	0.00
Funds not yet available	0.00	0.00
Funds available	0.00	0.00
Blocked payments	0.00	0.00
Other activity	--	0.00
Money market dividends	0.00	0.00
Debit card cash back	0.00	0.00
Credit card cash back	0.00	0.00
Other	-3,212.88	3,212.88

Note: This is not an actual bill.



You can no longer do business with PayPal. (Ref ID - PP-L-277678390756)

1 message

service@paypal.com <service@paypal.com>
To: JASON SHEPPARD <Jcsheppard2019@gmail.com>

Fri, Aug 27, 2021 at 3:37 PM

Hello, JASON SHEPPARD



You can no longer do business with PayPal

There's an issue with your account

Dear Jason Sheppard,

We have recently reviewed your PayPal account activity, and determined that you are in violation of PayPal's Acceptable Use Policy regarding your use of the PayPal products.

As a result, your account has been permanently limited, with no further ability to send or receive funds. Please remove all references to PayPal from your website/s and/or auction/s. This includes not only removing PayPal as a payment option, but also the PayPal logo and PayPal shopping cart.

The PayPal User Agreement states that PayPal reserves the right to limit an account for any violation of the PayPal User Agreement, including the Acceptable Use Policy. You can view the complete PayPal

Acceptable Use Policy by clicking the "Legal" link at the bottom of any PayPal page and clicking "PayPal Acceptable Use Policy". You can also find some more information on the PayPal Acceptable Use Policy on our Help Center.

The complete User Agreement can be found at the following URL:
<https://www.paypal.com/us/webapps/mpp/ua/useragreement-full>

If you have a remaining balance, you may withdraw the funds to your bank account. Information on how to withdraw funds from your PayPal Account can be found at our Help Center.

We appreciate your cooperation.

Sincerely,

PayPal

Help:

https://www.paypal.com/us/cgi-bin/helpweb?cmd=_help

Security Center:

<https://www.paypal.com/us/security>

Please don't reply to this email. It'll just confuse the computer that sent it and you won't get a response.

Copyright © 2021 PayPal, Inc. All rights reserved. PayPal is located at [2211 N. First St., San Jose, CA 95131](#).

PayPal Email ID PP1589 - 78ce3bdec97f3

[Log in to PayPal](#)



[Help & Contact](#) | [Security](#) | [Apps](#)



PayPal is committed to preventing fraudulent emails. Emails from PayPal will always contain your full name. [Learn to identify phishing](#)

Please don't reply to this email. To get in touch with us, click [Help & Contact](#).

Not sure why you received this email? [Learn more](#)

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PayPal PPC001764:1.4:78ce3bdec97f3

EXHIBIT G-1

CONGRESSIONAL / REGULATORY

January 6 Committee preservation and production demands directed to Wimkin and Jason C. Sheppard.

This cover sheet immediately precedes the exhibit identified above.

BENNIE G. THOMPSON, MISSISSIPPI
CHAIRMAN

ZOE LÖFGREN, CALIFORNIA
ADAM B. SCHIFF, CALIFORNIA
PETE AGUILAR, CALIFORNIA
STEPHANIE N. MURPHY, FLORIDA
JAMIE RASKIN, MARYLAND
ELAINE G. LURIA, VIRGINIA
LIZ CHENEY, WYOMING
ADAM KINZINGER, ILLINOIS



U.S. House of Representatives
Washington, DC 20515

january6th.house.gov
(202) 225-7800

One Hundred Seventeenth Congress
Select Committee to Investigate the January 6th Attack on the United States Capitol

November 18, 2021

Mr. Jason Sheppard
Chief Executive Officer
Wimkin
c/o Michael J. Khouri
Khouri Law Firm APC
2222 Martin St., Suite 215
Irvine, CA 92612

Dear Mr. Sheppard:

The Select Committee to Investigate the January 6th Attack on the United States Capitol is examining the facts, circumstances, and causes of the attack and relating to the peaceful transfer of power, in order to identify and evaluate lessons learned and to recommend corrective laws, policies, procedures, rules, or regulations.

Pursuant to the purposes and functions set forth in House Resolution 503, the Select Committee requests that you produce the documents described in the attached schedule in your custody, control, or possession. Please produce this information to the Select Committee no later than December 2, 2021. An attachment to this letter provides additional instructions for responding to the Select Committee's request.

If you have questions, please contact Select Committee investigative staff at 202-225-7800.

Sincerely,

A handwritten signature in blue ink that reads "Bennie G. Thompson".

Bennie G. Thompson
Chairman

SCHEDULE

The Select Committee requests the following documents and information since April 1, 2020, unless otherwise specified:

1. All internal or external reviews, studies, reports, data, analyses, and related communications regarding your platform(s) and:
 - i. Misinformation, disinformation, and malinformation relating to the 2020 election;¹
 - ii. Efforts to overturn, challenge, or otherwise interfere with the 2020 election or the certification of electoral college results;
 - iii. Domestic violent extremists, including racially or ethnically motivated violent extremists, militia violent extremists, sovereign citizen violent extremists, QAnon, or other extremists associated with efforts to overturn the 2020 election, including the January 6, 2021, attack, attacks against other State capitols, and attempted attacks against the January 20, 2021 inauguration of President Joseph R. Biden, Jr.;² and
 - iv. Foreign malign influence in the 2020 election, including known or suspected coordination between foreign and/or domestic influences to interfere in the 2020 elections, or cause domestic unrest.
2. All internal or external reviews, studies, reports, data, analyses, and related communications regarding how your platform's/platforms' algorithms might contribute to any of the factors described in request 1 above.
3. Any modifications and/or changes to policies or algorithms intended to address the items detailed in requests 1 and 2.
4. Any modifications or changes recommended or considered, but not implemented, intended to address the items detailed in requests 1 and 2.
5. All accounts, users, groups, events, messaging forums, marketplaces, posts, or other user-generated content that was sanctioned, suspended, removed, throttled,

¹ For purposes of your search and production, please refer to the definitions used by the Cybersecurity and Infrastructure Security Agency, online at <https://www.cisa.gov/mdm>.

² For purposes of your search and production, please refer to the definitions of these terms found, among other places, in a March 1, 2021, bulletin from the Office of the Director of National Intelligence (*Domestic Violent Extremism Poses Heightened Threat in 2021*, online at <https://www.dni.gov/files/ODNI/documents/assessments/UnclassSummaryofDVEAssessment-17MAR21.pdf>), and a June 4, 2021, bulletin from the Federal Bureau of Investigation (*Adherence to QAnon Conspiracy Theory by Some Domestic Violent Extremists*, online at <https://s3.documentcloud.org/documents/20889411/adherence-to-qanon-conspiracy-theory-by-some-domestic-violent-extremists4.pdf>).

deprioritized, labeled, suppressed, or banned from your platform(s) related to any of the items detailed in request 1(i)-(iv) above.

6. All protocols and analyses in place prior to January 6, 2021, to identify, report, sanction, suspend, remove, throttle, deprioritize, label, suppress, or ban any of the items detailed in request 1(i)-(iv) above, and any changes implemented to those protocols, analyses, or algorithms since January 6, 2021.
7. All accounts, users, groups, events, messaging forums, marketplaces, posts, or other user-generated content referred, shared with, or provided to law enforcement or other State, local, or Federal Government officials or agencies regarding any of the items detailed in request 1(i)-(iv) above, and the basis for such action.
8. All requests by law enforcement or other Federal, State, or local government officials or agencies for information relating to any of the items detailed in request 1(i)-(iv) above, and the basis for such requests.
9. All other communications with law enforcement or other Federal, State, or local government officials or agencies relating to any of the items detailed in request 1(i)-(iv) above.
10. All protocols in place prior to January 6, 2021, for notifying or otherwise sharing information with law enforcement or other Federal, State, or local government officials or agencies of violent or dangerous content, and any changes implemented after January 6, 2021.
11. Internal communications, reports, documents, or other materials relating to internal employee concerns about content on the platform associated with any of the items detailed in request 1(i)-(iv) above.
12. All document retention policies in place on January 6, 2021, including policies for communications by the company or its employees and retention policies for user-generated content.
13. All document retention or preservation holds implemented related to the events of January 6, 2021, or any related litigation or investigation.
14. A copy of all documents produced to any party as part of litigation or internal or external investigation related to the events of January 6, 2021.

BENNIE G. THOMPSON, MISSISSIPPI
CHAIRMAN

ZOE LOFGREN, CALIFORNIA
ADAM B. SCHIFF, CALIFORNIA
PETE AGUILAR, CALIFORNIA
STEPHANIE N. MURPHY, FLORIDA
JAMIE RASKIN, MARYLAND
ELAINE G. LURIA, VIRGINIA
LIZ CHENEY, WYOMING
ADAM KINZINGER, ILLINOIS



U.S. House of Representatives
Washington, DC 20515

january6th.house.gov
(202) 225-7800

One Hundred Seventeenth Congress

Select Committee to Investigate the January 6th Attack on the United States Capitol

November 18, 2021

Mr. Jason Sheppard
Chief Executive Officer
Wimkin
c/o Michael J. Khouri
Khouri Law Firm APC
2222 Martin St., Suite 215
Irvine, CA 92612

Dear Mr. Sheppard:

Pursuant to House Resolution 503, the Select Committee to Investigate the January 6th Attack on the United States Capitol is examining the facts, circumstances, and causes of the attack and relating to the peaceful transfer of power, in order to identify and evaluate lessons learned and to recommend corrective laws, policies, procedures, rules, or regulations.

As Chairman, I request that you direct that Wimkin preserve records relating to certain individuals who hold or have held accounts with your company from April 1, 2020, to January 31, 2021.

The Select Committee seeks the preservation of these records as part of its examination of the violent attack on the Capitol and the broader context of efforts to delay or interfere with the peaceful transfer of power following the 2020 election. The Select Committee specifically requests that you preserve information you may possess about individuals whom the U.S. Department of Justice (DOJ) and/or the District of Columbia has charged with crimes associated with the attack; individuals who were listed on permit applications or were otherwise involved in organizing, funding, or speaking at the January 5, 2021, or January 6, 2021, rallies in the District of Columbia relating to objecting to the certification of the electoral college votes; and individuals potentially involved with discussions of plans to challenge, delay, or interfere with the January 6, 2021, certification or otherwise attempt to overturn election results, in the days preceding and up through the attack.

The Select Committee will contact you to transmit a document listing the individuals whose records the Select Committee seeks to preserve. Inclusion of any individual name on the list should not be viewed as indicative of any wrongdoing by that person or others. The document identifies individuals who may have relevant information to aid the factfinding of the Select Committee. The list indicates where court filings in DOJ proceedings or other public accounts associated with these individuals have identified specific numbers, email addresses, or social media account names. Where there is no such information indicated, the Select Committee

Mr. Jason Sheppard

Page 2

requests that you preserve records in your custody associated with the name of the listed individual. Lastly, the Select Committee requests that you maintain the confidentiality of that document and the personal identifying information included therein.

The Select Committee requests that you preserve metadata, subscriber information, technical usage information, and content of communications for the listed individuals. With respect to each account held by your company, please preserve records from April 1, 2020, through January 31, 2021, specifically including (if applicable):

1. All records or other information regarding the identification of the account, including full name, physical address, telephone numbers, and other identifiers; records of session times and durations; the date on which the account was created; the length of service; the types of services utilized; the IP address used to register the account; log-in IP addresses associated with session times and dates; account status; alternative email addresses provided during registration; methods of connecting; log files; and means and source(s) of payment, including any credit or bank account number or online payment service.
2. Subscriber information, metadata, and call or message details associated with the account, including dates, times, senders, recipients, and other information regarding all voice calls, voicemail messages, text or SMS/MMS messages, data communications, tower locations and azimuth for the sectors assessed during the communication, and location of the phone associated with the account.
3. Content of communications, including all emails, voice messages, text or SMS/MMS messages, videos, photographs, direct messages, address books, contact lists, and other files or other data communications stored in or sent from the account; and any removal of profile or content information.
4. All records pertaining to your company's communications with the individual regarding the account, including contacts with support services and records of actions taken.

The Select Committee also requests that you do not disable, suspend, lock, cancel, or interrupt service to these subscribers or accounts solely due to this request. If you are not able or willing to respond to this request without alerting the subscribers or the accounts, please contact the Select Committee prior to proceeding.

As the Select Committee continues its work, we anticipate delivering to you document requests for more specific categories of information. Your immediate efforts to identify and preserve these documents is therefore essential.

Mr. Jason Sheppard
Page 3

If you have questions, please contact Select Committee investigative staff at 202-225-7800.

Sincerely,

A handwritten signature in blue ink that reads "Bennie G. Thompson". The signature is written in a cursive style with a large, stylized initial "B".

Bennie G. Thompson
Chairman

EXHIBIT H-1

JANUARY 6 DEPOSITIONS

Patrick Casey deposition excerpt referencing Wimkin.

This cover sheet immediately precedes the exhibit identified above.

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SELECT COMMITTEE TO INVESTIGATE THE
JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

DEPOSITION OF: PATRICK CASEY

Wednesday, March 2, 2022

Washington, D.C.

The deposition in the above matter was held in Room 4480, O'Neill House Office
Building, commencing at 10:07 a.m.

Present: Representative Aguilar.

- 1 A Okay.
- 2 Q -- and posting that way.
- 3 8chan?
- 4 A No.
- 5 Q Muis?
- 6 A No.
- 7 Q Wimkin?
- 8 A No.
- 9 Q Zello?
- 10 A No.
- 11 Q Are there platforms that you previously used and no longer use?
- 12 A Yes.
- 13 Q Facebook?
- 14 A Yes.
- 15 Q You mentioned that you have a Twitter, correct?
- 16 A Yes.
- 17 Q Do you use Reddit?
- 18 A Not currently.
- 19 Q Twitch?
- 20 A Yes, I have an account, and I can't recall when I've used it last.
- 21 Q Great. Bear with me.
- 22 Discord?
- 23 A Yes.
- 24 Q TikTok?
- 25 A Not currently.

EXHIBIT H-2

JANUARY 6 DEPOSITIONS

Robert Schornack interview excerpt referencing Wimkin.

This cover sheet immediately precedes the exhibit identified above.

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SELECT COMMITTEE TO INVESTIGATE THE
JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

INTERVIEW OF: ROBERT SCHORNACK

Tuesday, February 1, 2022

Washington, D.C.

The interview in the above matter was held via Webex, commencing at 4:03 p.m.

1 A Yeah. I mean, I -- I wasn't really into Snapchat, you know, until after
2 Facebook, but I wouldn't say I went there for news. It was more just to look at funny
3 videos of my friends and family.

4 Q What about Telegram?

5 A Don't know what Telegram is.

6 Q Twitter?

7 A I had a Twitter, but I never really went on there. I mean, if there was
8 something from Twitter on Facebook, then I would, you know, click on it and read about
9 it, but I very rarely ever went on Twitter.

10 Q Gettr?

11 A Don't know what that is.

12 Q YouTube?

13 A YouTube, yeah. I mean, but again, YouTube was usually -- if there was a
14 YouTube video on Facebook, then I would, you know, click on it. There were times that I
15 would go on YouTube to look up videos because I have it -- I have the YouTube app on my
16 Roku at home. So if there was really a video I'd want to see, then, you know, I'd put it
17 on there from time to time.

18 Q What about Discord?

19 A I don't know what that is either.

20 Q The Donald-Dot-Win?

21 A Is that new? I'm surprised I don't know about that one, but I don't recall.
22 I don't think so.

23 Q Okay. Gab, G-a-b?

24 A No.

25 Q Wimkin, W-i-m-k-i-n?

EXHIBIT H-3

JANUARY 6 DEPOSITIONS

Annie Howell deposition excerpt referencing Wimkin.

This cover sheet immediately precedes the exhibit identified above.

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SELECT COMMITTEE TO INVESTIGATE THE
JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

INTERVIEW OF: ANNIE HOWELL

Friday, December 14, 2022

Washington, D.C.

The interview in the above matter was held via Webex, commencing at 1:00 p.m.

1 And then you also mentioned -- I heard you mention Parler and stuff, so let's get
2 into, like, the social media applications. I'm going to go through just a list of them.
3 Just tell me if you used them to stay abreast of political events, okay?

4 So, Facebook?

5 A Yes.

6 Q Okay. Parler?

7 A Yes.

8 Q Reddit?

9 A No.

10 Q Okay. Telegram?

11 A Yes.

12 Q Okay. Twitter?

13 A Yes.

14 Q Gettr?

15 A What was that?

16 Q G-e-t-t-r, Gettr?

17 A No.

18 Q Okay. Thedonald.win?

19 A No.

20 Q Gab, G-a-b?

21 A No.

22 Q And then Wimkin, W-i-m-k-i-n?

23 A No.

24 Q All right. So which of these social media sources did you rely on the most,
25 if you had to rank a few of them?

EXHIBIT H-4

JANUARY 6 DEPOSITIONS

Stephen Ayres deposition excerpt referencing Wimkin.

This cover sheet immediately precedes the exhibit identified above.

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SELECT COMMITTEE TO INVESTIGATE THE
JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

INTERVIEW OF: STEPHEN AYRES

Friday, June 17, 2022

Washington, D.C.

The interview in the above matter was held via Webex, commencing at 1:36 p.m.

1 there or had even been on there.

2 Q You just mentioned Twitter, right?

3 A Yes.

4 Q So you follow things on Twitter?

5 A Yup.

6 Q GETTR, G-E-T-T-R?

7 A No. I've never even heard of that one.

8 Q You mentioned YouTube already.

9 So you did watch news shows on YouTube?

10 A Yes. Correct.

11 Q TheDonald.win, did you ever get on that website?

12 A No. I never heard of that one.

13 Q Gab, G-A-B?

14 A Nope, never heard of that one.

15 Q And the last one is Wimkin, W I-m-k-i-n?

16 A Nope. I don't believe I've heard of that one as well.

17 Q All right. I think you might have touched on this so just to make sure we
18 have it clear: If you had to pick one or a couple of these sources, which sources did you
19 rely on the most?

20 A They would have been -- it would have been Facebook and Twitter would
21 have been like the top two.

22 Q And YouTube as well? Because I know you mentioned some of the shows --

23 A Yeah. Following them, yeah, and the videos from there. I usually just
24 watch videos. I wasn't real active on YouTube. I just watched videos and comment
25 very seldomly. Facebook and Twitter, I'd post stuff every day and stuff like that.

EXHIBIT H-5

JANUARY 6 DEPOSITIONS

John D. Wright deposition excerpt referencing Wimkin.

This cover sheet immediately precedes the exhibit identified above.

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SELECT COMMITTEE TO INVESTIGATE THE
JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

INTERVIEW OF: JOHN D. WRIGHT

Thursday, March 31, 2022

Washington, D.C.

The interview in the above matter was held via Webex, commencing at 2:07 p.m.

1 Q Yep, yep. Just to the best of your recollection, that's all we're asking.

2 What about Twitter? It doesn't sound like -- from what we talked about before
3 we went on the record, it doesn't sound like you used Twitter, like, at all?

4 A No. I don't even know how to use Twitter.

5 Q Okay. What about GETTR?

6 A No.

7 Q TheDonald.win?

8 A No. I didn't even know that existed.

9 Q Let's see --

10 A Let me write that down -- no.

11 Q Gab?

12 A No.

13 Q Okay. And Wimkin, W-i-m-k-i-n?

14 A I never heard of it.

15 Q Did you watch -- and going back to the cable news, did you watch OAN?

16 A Occasional, yeah.

17 Q Okay. And did you watch Newsmax at all?

18 A On occasion. The biggest shows I watched was Tucker and Hannity and
19 Laura, and there was another. Shannon Bream, I think, was on after that. It was
20 always at night --

21 Q Yeah.

22 A -- the nighttime. But, I mean, a lot of times it watched me more than I
23 watched it.

24 Q And what about on Telegram, were there any specific chats or channels that
25 you were following on Telegram?

EXHIBIT H-6

JANUARY 6 DEPOSITIONS

Lewis Easton Cantwell deposition excerpt referencing Wimkin.

This cover sheet immediately precedes the exhibit identified above.

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SELECT COMMITTEE TO INVESTIGATE THE
JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

INTERVIEW OF: LEWIS EASTON CANTWELL

Tuesday, April 26, 2022

Washington, D.C.

The interview in the above matter was held via Webex, commencing at 4:02 p.m.

1 Q Got it.

2 What about Discord?

3 A Yeah, but that's for gaming.

4 Q Okay.

5 Did you go to the TheDonald.win?

6 A No. I -- no. Discord -- like, our Discord channels -- I used to run a server
7 on a video game called Rust, and so I have a bunch of friends who play on there. And
8 that's the easiest way to communicate across the world, because I have friends who are,
9 like, all over the world that are in our, what they call a clan. But, anyways, yeah.
10 That's what I use Discord for.

11 Q Okay. So what about a separate site, TheDonald.win?

12 A No. I've never -- I didn't know it existed.

13 Q Okay.

14 Gab, G-a-b?

15 A No. Don't know what it is.

16 Q Wimkin, W-i-m-k-i-n?

17 A No. Don't know what it is.

18 Q And if you had to pick one or a couple of these sites that I just went through,
19 which source did you rely on the most for your news?

20 A I wouldn't say I relied on any of those for news. That's a terrible way to
21 rely on news, is from social media. I never relied on any social media for news. Like,
22 I'm saying I saw news that was on social media, but that wasn't where I got my news
23 from.

24 Like I said, I use an app that breaks down all the news. And so that one
25 particular app sends me different -- from every different, you know, website, all, like,