

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 50-2019-CA-016488-XXXX-MB

GABE HOFFMAN, an individual,

Plaintiff,

v.

JULIO CESAREO JACQUEZ a/k/a JULIO JACQUES
a/k/a All American Cartel LLC, an individual.

Defendant.

PLAINIFF'S VERIFIED MOTION FOR INJUNCTIVE RELIEF

Pursuant to Florida Rule of Civil Procedure 1.610 and other applicable law, Plaintiff, Gabe Hoffman, (hereinafter "HOFFMAN"), hereby moves on the following grounds for the order of this Court temporarily and permanently enjoining Julio Cesareo Jacques ("JACQUEZ"), Defendant, for an order of this Court to temporarily and permanently enjoin JACQUEZ from taking certain actions more fully described below (the "Actionable Misconduct") based on facts and circumstances herein presented, and those alleged in the complaint initiating this cause (the "Complaint").

FACTUAL BACKGROUND

1. HOFFMAN is the founder of Accipiter Capital Management, LLC, ("Company") which is a hedge fund, located in Palm Beach County, Florida. He is a highly respected investment manager that has previously appeared on television addressing a wide range of business issues and financial investments. He manages large sums of investor money and is a financial markets expert.

2. HOFFMAN'S livelihood and success are inextricably connected to his unassailable integrity and hard-won relationships to his investors. HOFFMAN maintains relationships with prominent and well-known individuals in the financial markets and financial management industry

and relies on his excellent reputation and unassailable integrity to attract and maintain his investment capital for his Company's operations.

3. Additionally, HOFFMAN is a well-respected philanthropist who individually and solely funded and produced a ground-breaking documentary film exposing child sexual abuse in Hollywood titled "An Open Secret." "An Open Secret" has generated extensive worldwide press and critical acclaim by many major publications, television and widely view forms of alternative media. Millions of viewers have seen HOFFMAN discussing "An Open Secret" and child sexual abuse in Hollywood in live interviews, or in print/internet media throughout the world.

4. A former Hollywood bit actor named Isaac Kappy gained notoriety through his public accusations of pedophilia, which included accusations against prominent Hollywood personalities of the Jewish faith, such as Seth Green and Steven Spielberg.

5. HOFFMAN though his documentary on child sexual abuse in Hollywood and as a result of his Jewish faith, was also a target of Kappy's baseless allegations of pedophilia in Hollywood.

6. Kappy was found dead on Monday, May 13, 2019, at the age of 42. His death was reported in local newspapers as a suicide, which cited a statement from the Arizona Department of Public Safety. Kappy jumped to his death at the Transwestern Road Bridge near Bellemont, Arizona, and was struck by a pickup truck on Interstate 40, around 7:30 AM. <https://www.azcentral.com/story/news/local/arizona-breaking/2019/05/15/thor-actor-isaac-kappy-jumps-off-arizona-bridge-near-flagstaff/3682802002/>. See **Exhibit "1"** attached hereto.

7. Kappy's death became the subject of speculation on various social media sites on the internet. Various extreme and outlandish conspiracy theories attempted to link HOFFMAN as well

as certain prominent Jewish Hollywood personalities to Kappy's death, positing that Kappy was murdered, rather than died by suicide.

8. Kappy was an ardent believer in the QAnon conspiracy theory (discussed further below). QAnon has been described in the media as "a baseless conspiracy theory that a shadow network is working against President Trump, and that an insider, "Q," knows how it will be exposed." <https://www.buzzfeednews.com/article/briannasacks/fbi-memo-conspiracy-theories-domestic-terrorism>. See **Exhibit "2"** attached hereto.

9. Kappy's final post on Instagram, prior to his suicide, featured an apology to QAnon, <https://www.theblaze.com/news/actor-leaves-apology-to-trump-before-killing-himself>. See **Exhibit "3"** attached hereto.

10. In a May 30, 2019, memo obtained by Yahoo news, the FBI also describes how QAnon theorists believe that Trump is leading an effort "to dismantle a conspiracy involving 'deep state' actors and global elites allegedly engaged in an international child sex trafficking ring."

11. The FBI memo also states that federal authorities believe "identity based, and fringe political conspiracy theories", such as QAnon, are very likely to motivate some domestic terrorists to "commit criminal and sometimes violent activity," since certain narratives "tacitly support or legitimize violent action." <https://news.yahoo.com/fbi-documents-conspiracy-theories-terrorism-160000507.html>. See **Exhibit "4"** attached hereto.

12. The United States Secret Service does not allow people displaying QAnon to enter Trump rallies. <https://www.thedailybeast.com/qanoners-say-their-qanon-merch-is-being-banned-by-secret-service-at-trump-rallies>. See **Exhibit "5"** attached hereto.

13. The media has also reported that a QAnon follower murdered a reputed New York City mob boss in July, 2019. <https://abcnews.go.com/US/man-shot-mob-boss-francesco-franky-boy-cali/story?id=64483955>. See **Exhibit “6”** attached hereto.

14. JACQUEZ has publicly expressed his belief in the QAnon conspiracy theory through many social media posts and YouTube videos he created.

15. The QAnon conspiracy theory is based upon the idea that there is a worldwide cabal of Satan-worshipping pedophiles who are attempting to rule the world, controlling politicians and the media. Followers of QAnon believes that one of the reasons Donald Trump was elected was to put an end to this ruling cabal. As outlandish and bizarre as this sounds, there a dark and grimacing reality to QAnon’s existence and activities.

16. QAnon are what is defined as “stochastic terrorists,” whereby they public demonize people or groups in order to incite violence.

17. “Q” is a reference to the top-secret Q clearance. QAnon believers commonly tag their social media posts with the hashtag #WWG1WGA, signifying the motto “where we go one, we go all.”

18. “Q” is possibly a person as well. A person identifying as “Q Clerance Patriot” first appeared on the message board 4chan on October 28, 2017, posting message in a thread entitled “Calm Before the Storm.” The “storm” is QAnon parlance for an imminent event when thousands of alleged suspects will be arrested, imprisoned and executed.

19. AQanon may be best understood as an example of what historian Richard Hofstadter called in 1954 “The Paranoid Style in American Politics,” which relates to religious millenarianism

and apocalypticism. The vocabulary of QAnon trades on Christian Biblical ideas of “storms” and “floods” and other apocalyptic imagery.

20. Travis View, a researcher who studies QAnon, says that the following is as addictive as a video game and offers the “player” the appealing possibility of being involved in something of world-historical importance. According to View, “you can sit at your computer and search for information and then post about what you find, and Q basically promises that through this process, you are going to radically change the country and institute an incredible, almost bloodless revolution and then be part of major historical movement.

21. Traditional media outlets have reported that the FBI has identified QAnon conspiracy theory as a potential domestic terrorist threat.

22. JACQUEZ’S YouTube channel is identified as “An All American Cartel LLC” at <https://www.youtube.com/channel/UC7vSHfavURv7WtvyoAkRW2g>. See **Exhibit “7”** attached hereto.

23. JACQUEZ’S attempts to raise money through this channel to finance his defamatory screeds against HOFFMAN and others. JACQUEZ self-identifies on his channel with QAnon’s mission and activities, <https://www.youtube.com/watch?v=jmHshHzt4Zs&t=20s>, posted January 10, 2020. See **Exhibit “8”** attached hereto. As noted above, QAnon uses the hashtag identifier, #WWG1WGA, to indicate its following. **Exhibit “8”** reflects this QAnon hashtag identifier plus others, reflecting QAnon identifiers. Moreover, JACQUEZ on this YouTube channel in the description of the video states “so proud of these guys! Long Live Q!,” referring to the QAnon theorists in the video.

24. JACQUEZ has been defaming HOFFMAN since on or about October 11, 2019. See First Amended Complaint, paragraphs 32-38 for a detailed discussion and analysis of the 2019 defamation.

25. On or about January 4th, 2020, JACQUEZ was served the original Complaint.

26. Since being served the original Complaint, JACQUEZ has amplified the nature and frequency of his heinous and defamatory statements against HOFFMAN, including creating multiple defamatory videos targeting HOFFMAN with violent imagery and overtones. Noteworthy aspects of the defamatory, scurrilous and shocking imagery in these videos is the image of a person with a bag over his head and a gunshot through the eye of the person, which is displayed for 3 minutes in the video while JACQUEZ discusses HOFFMAN. See **Exhibit “9”** attached hereto.

ARGUMENT

27. A preliminary injunction is appropriate if Plaintiff can demonstrate: 1) irreparable harm; 2) no adequate remedy at law; 3) a substantial likelihood of success; and 4) in the public interest. See Broward County v. Meiklejohn, 936 So. 2d (4th DCA 2006).

28. HOFFMAN has business relationships and contracts with investors that he, through his hedge fund, manages money for.

29. JACQUEZ, through his numerous heinous and defamatory comments has tortuously interfered with HOFFMAN by damaging his professional reputation and his ability to manage investor money.

30. This damage to professional reputation has irreparably harmed HOFFMAN. Clare v. Coleman (Parent) Holdings, Inc., 928 So. 2d 1246, 1249 (Fla. 4th DCA 2006).

31. HOFFMAN has a substantial likelihood of success on the merits of its tortious interference claims against JACQUEZ.

32. HOFFMAN lacks an adequate remedy at law.

33. An injunction is in the public interest.

RELIEF REQUESTED

Given the ugly nature of JACQUEZ'S defamatory statements and his tortious interference with HOFFMAN'S business relationships, the threat of a known terrorist group being appealed to (QAnon) for assistance and the likelihood that this terrorist group could take action against HOFFMAN to assist JACQUEZ in his misguided crusade against HOFFMAN, the public interest is served by: 1) entering a preliminary injunction against JACQUEZ, restraining him from all misconduct referenced above, including the removal of every social media, YouTube, and internet post where JACQUEZ has defamed HOFFMAN and, 2) enjoining JACQUEZ from travelling within five (5) miles of HOFFMAN'S residence in Palm Beach County, Florida, if in fact JACQUEZ travels to the State of Florida to represent himself in this proceeding or for any other matter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of February, 2020, this document was filed using the Florida Courts E-Filing Portal. This document is being served on all counsel and pro se parties of record by the Florida Courts E-Filing Portal, pursuant to and in compliance with Fla. R. Jud. Admin.

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Exhibit 1

'Thor' actor Isaac Kappy dies in Arizona at age 42

[Gabriella Khalaj](#), [Arizona Republic](#) Published 2:08 p.m. MT May 15, 2019 | Updated 1:44 p.m. MT May 19, 2019

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Actor Isaac Kappy (Photo: Paul Archuleta, FilmMagic)

Actor Isaac Kappy died Monday near Flagstaff.

Arizona Department of Public Safety officials said the 42-year-old died at the scene after jumping off the Transwestern Road bridge and onto I-40 about 7:30 a.m. The bridge is in the unincorporated Bellemont community west of Flagstaff.

DPS officials say two teenage witnesses told troopers they tried to stop Kappy.

Kappy was an actor from Albuquerque, New Mexico, and had small roles in major movies. He [played the pet store clerk](#) in the 2011 blockbuster movie "Thor." He had the role of Barbarossa in the 2009 film "[Terminator Salvation](#)" and Garfunkel in the 2009 movie "[Fanboys.](#)"

Kappy also was a member of the band Monster Paws.

According to his band mate Nate Santa Maria, Isaac was strong-willed and eccentric, as well as a great producer and engineer.

Santa Maria says Kappy was part of some of the greatest musical adventures of his life.

"I'll never forget him and his great humor and genuine kindness," said Santa Maria.

"There was nobody like him and there will never be again. He is irreplaceable," said Santa Maria.

Authorities say they are investigating the incident as a suicide.

Exhibit 2

The FBI Said Conspiracy Theories Like QAnon And Pizzagate Are Domestic Terrorism Threats

“Identity based, and fringe political conspiracy theories” are very likely to motivate some domestic terrorists to “commit criminal and sometimes violent activity,” the memo warns.



Brianna Sacks BuzzFeed News Reporter

Posted on August 1, 2019, at 6:21 p.m. ET





Sathi Soma / AP, Gene J. Puskar / AP

The FBI considers conspiracy theories that are born and spread online a dangerous breeding ground for domestic terrorists, according to recently revealed bulletin produced out of the agency's Phoenix field office.

The May 30 memo, first obtained by [Yahoo News](#), states that federal authorities believe "identity based, and fringe political conspiracy theories" are very likely to motivate some domestic terrorists to "commit criminal and sometimes violent activity," since certain narratives "tacitly support or legitimize violent action."

The bulletin specifically refers to QAnon, a baseless conspiracy theory that a shadow network is working against President Trump, and that an insider, "Q," knows how it will be exposed. The FBI office also describes how QAnon theorists believe that Trump is leading an effort "to dismantle a conspiracy involving 'deep state' actors and global elites allegedly engaged in an international child sex trafficking ring."

Trump supporters have embraced the conspiracy theory, wearing shirts and hats that feature the letter "Q" [at his rallies](#).

Members of the QAnon community expressed their anger and disbelief on Twitter, exclaiming, "how can Q and POTUS let this happen?"



[Travis View](#) [@travis_view](#)

The QAnon community, unsurprisingly, is shocked and confused that the FBI has identified QAnon as a domestic threat.

Several Q drops have asked Q followers to trust FBI Director Wray.



Jordan Sather @Jordan_Sathe... · 22m

Here we go.. 🤔

“The FBI for the first time has identified fringe conspiracy theories as a domestic terrorist threat, according to a previously unpublicized document obtained by Yahoo News. The document specifically mentions QAnon and Pizzagate...”



Exclusive: FBI document warns conspiracy theories are a new domes...
news.yahoo.com

🗨 53

↻ 142

❤ 222





Q-Soldier

@SoldierQ

@realDonaldTrump WTF
After us?



FBI Document Warns Conspiracy



Logic @OnWithLogic · 16m

1) Mildly awkward. FBI just included Qanon in a domestic terrorist threat assessment.



Exclusive: FBI document warns conspiracy theories are a new domes
news.yahoo.com

5

14

17



Coco

@CocoMAGAcoco

Replying to @OnWithLogic



Q Anons

@QAnons1

Wow Antifa runs around
people!!! Now the FBI s
bad!!! WTF Wray is an a

9:44 AM · 01 Aug 19 · Twitter for

The 15-page bulletin is the “first FBI product examining the threat of conspiracy theory–driven domestic extremists” and lists instances in which suspects plotted or carried out “deadly violence” because of false, fringe theories that they had found online.

They include that a gunman who killed 11 people at the Tree of Life Synagogue shooting in Pittsburgh last October, for example, had reposted a Zionist Occupation Government conspiracy theory cartoon on social media. In June 2018, a man from Nevada decked out with body armor, rifles, and ammunition was arrested and referenced QAnon.

On Tuesday, the Daily Beast reported that Twitter suspended an account that blasted conspiracy content, including QAnon material, after the president retweeted a theory that Democrats are the ones “interfering in our elections.”



Stephanie Keith / Getty Images

A woman wears a T-shirt in support of QAnon during a “Demand Free Speech” rally on Freedom Plaza on July 6 in Washington, DC.

The FBI document also cites Pizzagate, the bogus theory that Democratic operatives tied to Hillary Clinton were running a child sex-trafficking ring out of a pizza restaurant in Washington, DC. In 2016, a man from North Carolina showed up to the joint with an AR-15 rifle, shot through a door, and aimed it an employee thinking he was saving trafficked children.

“The FBI assesses these conspiracy theories very likely will emerge, spread, and evolve in the modern information marketplace, occasionally driving both groups and individual extremists to carry out criminal or violent acts,” the bulletin states. “These targets are then subjected to harassment campaigns and threats by supporters of the theory, and become vulnerable to violence or other dangerous acts.”

In its bulletin, the FBI's Phoenix Division also points out that because some conspiracy theories are highly partisan, major political events like the 2020 presidential election cycle will probably produce more extremists.

Although the bulletin acknowledges that conspiracy theory-driven crime is not new, it emphasizes how "today's information environment" and "crowd-sourcing" have changed the way the content more easily spreads and evolves.

"It is logical to assume that more extremist-minded individuals will be exposed to potentially harmful conspiracy theories, accept ones that are favorable to their views and possibly carry out criminal or violent actions as a result," the document states.

When asked about the Phoenix Division's bulletin, an FBI spokesperson told BuzzFeed News that it is the agency's standard practice to "not comment on specific intelligence products."

"The FBI routinely shares information with our law enforcement partners in order to assist in protecting the communities they serve," the spokesperson said.

Exhibit 3

Actor leaves extremely bizarre message on Instagram featuring apology to President Trump and QAnon just before killing himself

RIP

Photo by Paul Archuleta FilmMagic

SARAH TAYLOR

Actor Isaac Kappy committed suicide following a bizarre and rambling message on Instagram that included an apology to President Donald Trump and a group of conspiracy theorists.

Kappy, who once made headlines for [reportedly choking Michael Jackson's daughter, Paris](#), during a 2018 party, also made news headlines for alleging that some celebrities and Hollywood figures were pedophiles.

What are the details of his death?

Police reported that Kappy, 42, forced himself off a bridge over a freeway on Monday near Flagstaff, Arizona.

According to the [Arizona Daily Sun](#), Kappy died at the scene after leaping from the bridge and landing on the freeway below, where a vehicle struck him.

Prior to his death, Kappy performed small parts in movies like "Thor" and "Terminator: Salvation."

Authorities did not name a motive behind Kappy's apparent suicide.

What was in his Instagram post?

In a nearly incoherent and rambling Instagram post, Kappy — whose mental health appeared to deteriorate significantly around the time of the 2018 incident involving Paris Jackson — apologized for being a bad man throughout his life.

A portion of his post, which the late actor appears to have shared Monday, said, "Over the course of the last week, through introspection that should have happened MANY years ago, I have come to some stark revelations about my character. It is a testament to my utter arrogance that these revelations had not come sooner."

"You see," he continued, "I believed myself to be a good guy. I HAVE NOT been a good guy."

Kappy pointed out that he used people throughout his life for money and had betrayed them and broken their trust to further himself.

"I have sold drugs," he admitted. "I have tax delinquencies. I have debts. I have abused my body with cigarettes, drugs, and alcohol."

The actor revealed that he abused his friends and family even when they were simply trying to love him.

"Earlier this week, I committed an act so flippantly, without thought, that will become synonymous with short sightedness and petty, vile greed, and in the end, has cost me everything," he admitted. It is unclear what incident Kappy is pointing toward in the post.

Kappy — who in 2018 accused several Hollywood figures such as actors Seth Green and Tom Hanks, and producer Steven Spielberg of being pedophiles —

also said in his letter that despite "outing the truth of Hollywood," he "did not REFLECT ON MY OWN TRUTHS AND MANY, MANY SHORTCOMINGS."

"While it is true I have spent many, many hours of research and disseminating information about bad actors, I have had SO LITTLE CARE for introspection of MY OWN actions," he later wrote. "While it's true I have outed many pedophiles that were former FRIENDS, I remained in their sphere for much longer than I should have, and attempted to gain from them AFTER I knew about their actions."

What else?

The actor went on and apologized to the "Q movement" — or QAnon, a pro-Trump 4Chan group that peddles many conspiracy theories, including that there is a deep state plot against President Trump — for sabotaging their work. You can read more about the group [here](#).

"Q says they give people enough rope to hang themselves, and I have hung myself," he wrote. "I have told people in the Trump administration that I am willing to admit to my many crimes in a public setting, and committed to execution, in a public setting."

"A nation cannot suffer its traitors, and I am no exception," Kappy added.

"To Jesus," he wrote, "I am sorry I have betrayed you AGAIN. ... Jesus, you offered so much, and instead of reveling in your wisdom, I used my attention on darkness."

"President Trump," he continued, "I have betrayed you and squandered good will, and now I shall forever be known for my actions."

Kappy went on to apologize to a plethora of others in the lengthy note, including former friends, family, and more.

"I will be using the remainder of my time on earth to atone for my transgressions, and to seek the light within, in others and myself," he concluded.

Kappy dated the note July 4, 2019, which he wrote "Return of the King" and "Return to THE LIGHT."

Exhibit 4

Exclusive: FBI document warns conspiracy theories are a new domestic terrorism threat

Jana Winter, Contributor, Yahoo News-August 1, 2019

The FBI for the first time has identified fringe conspiracy theories as a domestic terrorist threat, according to a previously unpublicized document obtained by Yahoo News. (Read the document below.)

The FBI intelligence bulletin from the bureau's Phoenix field office, dated May 30, 2019, describes "conspiracy theory-driven domestic extremists," as a growing threat, and notes that it is the first such report to do so. It lists a number of arrests, including some that haven't been publicized, related to violent incidents motivated by fringe beliefs.

The document specifically mentions QAnon, a shadowy network that believes in a deep state conspiracy against President Trump, and Pizzagate, the theory that a pedophile ring including Clinton associates was being run out of the basement of a Washington, D.C., pizza restaurant (which didn't actually have a basement).

"The FBI assesses these conspiracy theories very likely will emerge, spread, and evolve in the modern information marketplace, occasionally driving both groups and individual extremists to carry out criminal or violent acts," the document states. It also goes on to say the FBI believes conspiracy theory-driven extremists are likely to increase during the 2020 presidential election cycle.

FBI designates Pizzagate and QAnon conspiracy-based theories as domestic threats. (Photo illustration: Yahoo News; photos: Michael E. Miller/The Washington Post via Getty Images, Matt Rourke/AP, AP)

The FBI said another factor driving the intensity of this threat is "the uncovering of real conspiracies or cover-ups involving illegal, harmful, or unconstitutional activities by government officials or leading political

figures.” The FBI does not specify which political leaders or which cover-ups it was referring to.

President Trump is mentioned by name briefly in the latest FBI document, which notes that the origins of QAnon is the conspiratorial belief that “Q,” allegedly a government official, “posts classified information online to reveal a covert effort, led by President Trump, to dismantle a conspiracy involving ‘deep state’ actors and global elites allegedly engaged in an international child sex trafficking ring.”

This recent intelligence bulletin comes as the FBI is facing pressure to explain who it considers an extremist, and how the government prosecutes domestic terrorists. In recent weeks the FBI director has addressed domestic terrorism multiple times but did not publicly mention this new conspiracy theorist threat.

The FBI is already under fire for its approach to domestic extremism. In a contentious hearing last week before the Senate Judiciary Committee, FBI Director Christopher Wray faced criticism from Democrats who said the bureau was not focusing enough on white supremacist violence. “The term ‘white supremacist,’ ‘white nationalist’ is not included in your statement to the committee when you talk about threats to America,” Sen. Richard Durbin, D-Ill., said. “There is a reference to racism, which I think probably was meant to include that, but nothing more specific.”

Wray told lawmakers the FBI had done away with separate categories for black identity extremists and white supremacists, and said the bureau was instead now focusing on “racially motivated” violence. But he added, “I will say that a majority of the domestic terrorism cases that we've investigated are motivated by some version of what you might call white supremacist violence.”

The FBI had faced mounting criticism for the term “black identity extremists,” after its use was revealed by Foreign Policy magazine in 2017. Critics pointed out that the term was an FBI invention based solely on race, since no group or even any specific individuals actually identify as black identity extremists.

In May, Michael C. McGarrity, the FBI’s assistant director of the counterterrorism division, told Congress the bureau now “classifies domestic terrorism threats into four main categories: racially motivated violent extremism, anti-government/anti-authority extremism, animal

rights/environmental extremism, and abortion extremism,” a term the bureau uses to classify both pro-choice and anti-abortion extremists.

The new focus on conspiracy theorists appears to fall under the broader category of anti-government extremism. “This is the first FBI product examining the threat from conspiracy theory-driven domestic extremists and provides a baseline for future intelligence products,” the document states.



FBI Director Christopher Wray testifies before a Senate Judiciary Committee hearing. (Photo: Liu Jie/Xinhua via Getty)

The new category is different in that it focuses not on racial motivations, but on violence based specifically on beliefs that, in the words of the FBI document, “attempt to explain events or circumstances as the result of a group of actors working in secret to benefit themselves at the expense of

others” and are “usually at odds with official or prevailing explanations of events.”

The FBI acknowledges conspiracy theory-driven violence is not new, but says it’s gotten worse with advances in technology combined with an increasingly partisan political landscape in the lead-up to the 2020 presidential election. “The advent of the Internet and social media has enabled promoters of conspiracy theories to produce and share greater volumes of material via online platforms that larger audiences of consumers can quickly and easily access,” the document says.

The bulletin says it is intended to provide guidance and “inform discussions within law enforcement as they relate to potentially harmful conspiracy theories and domestic extremism.”

The FBI Phoenix field office referred Yahoo News to the bureau’s national press office, which provided a written statement.

“While our standard practice is to not comment on specific intelligence products, the FBI routinely shares information with our law enforcement partners in order to assist in protecting the communities they serve,” the FBI said.

In its statement, the FBI also said it can “never initiate an investigation based solely on First Amendment protected activity. As with all of our investigations, the FBI can never monitor a website or a social media platform without probable cause.”

The Department of Homeland Security, which has also been involved in monitoring domestic extremism, did not return or acknowledge emails and phone requests for comment.

While not all conspiracy theories are deadly, those identified in the FBI’s 15-page report led to either attempted or successfully carried-out violent attacks. For example, the Pizzagate conspiracy led a 28-year-old man to invade a Washington, D.C., restaurant to rescue the children he believed were being kept there, and fire an assault-style weapon inside.



Edgar Maddison Welch, 28 of Salisbury, N.C., surrenders to police in Washington in 2016. Welch, a man who police said was inspired by false internet rumors dubbed Pizzagate to fire an assault weapon inside a Washington pizzeria, pleaded guilty in 2017 to two charges. (Photo: Sathi Soma via AP)

The FBI document also cites an unnamed California man who was arrested on Dec. 19, 2018, after being found with what appeared to be bomb-making materials in his car. The man allegedly was planning “blow up a satanic temple monument” in the Capitol rotunda in Springfield, Ill., to “make Americans aware of Pizzagate and the New World Order, who were dismantling society,” the document says.

Historian David Garrow, the author of a Pulitzer Prize-winning biography of Martin Luther King Jr. who has worked extensively with FBI archives, raised doubts to Yahoo News about the memo. He says the FBI’s default assumption is that violence is motivated by ideological beliefs rather than mental illness. “The guy who shot up the pizza place in D.C.: Do we think of him as a right-wing activist, or insane?” Garrow asked.

Garrow was similarly critical of the FBI's use of the term "black identity extremists" and related attempts to ascribe incidents like the 2016 shooting of six police officers in Baton Rouge, La., to black radicalism. He said the shooter, Gavin Long, had a history of mental health problems. "The bureau's presumption — the mindset — is to see ideological motives where most of the rest of us see individual nuttiness," he said.

Identifying conspiracy theories as a threat could be a political lightning rod, since President Trump has been accused of promulgating some of them, with his frequent references to a deep state and his praise in 2015 for Alex Jones, who runs the conspiracy site InfoWars. While the FBI intelligence bulletin does not mention Jones or InfoWars by name, it does mention some of the conspiracy theories frequently associated with the far-right radio host, in particular the concept of the New World Order.

Jones claimed the Sandy Hook Elementary School shooting, in which 26 children were killed, was a hoax, a false flag operation intended as a pretext for the government to seize or outlaw firearms. The families of a number of victims have sued Jones for defamation, saying his conspiracy-mongering contributed to death threats and online abuse they have received.

While Trump has never endorsed Sandy Hook denialism, he was almost up until the 2016 election the most high-profile promoter of the birther conspiracy that claimed former President Barack Obama was not born in the United States. He later dropped his claim, and deflected criticism by pointing the finger at Hillary Clinton. He said her campaign had given birth to the conspiracy, and Trump "finished it."

There is no evidence that Clinton started the birther conspiracy.



Then-Republican presidential candidate Donald Trump states that he believes President Barack Obama was born in the United States. (Photo: Tom Williams/CQ Roll Call via Getty Images)

Joe Uscinski, an associate professor of political science at the University of Miami, whose work on conspiracy theories is cited in the intelligence bulletin, said there's no data suggesting conspiracy theories are any more widespread now than in the past. "There is absolutely no evidence that people are more conspiratorial now," says Uscinski, after Yahoo News described the bulletin to him. "They may be, but there is not strong evidence showing this."

It's not that people are becoming more conspiratorial, says Uscinski, but conspiracies are simply getting more media attention.

"We are looking back at the past with very rosy hindsight to forget our beliefs, pre-internet, in JFK [assassination] conspiracy theories and Red scares. My gosh, we have conspiracy theories about the king [of England]

written into the Declaration of Independence,” he said, referencing claims that the king was planning to establish tyranny over the American colonies.

It’s not that conspiracy theorists are growing in number, Uscinski argues, but that media coverage of those conspiracies has grown. “For most of the last 50 years, 60 to 80 percent of the country believe in some form of JFK conspiracy theory,” he said. “They’re obviously not all extremist.”

Conspiracy theories, including Russia’s role in creating and promoting them, attracted widespread attention during the 2016 presidential election when they crossed over from Internet chat groups to mainstream news coverage. Yahoo News’s “Conspiracyland” podcast recently revealed that Russia’s foreign intelligence service was the origin of a hoax report that tied the murder of Seth Rich, a Democratic National Committee staffer, to Hillary Clinton.

Washington police believe that Rich was killed in a botched robbery, and there is no proof that his murder had any political connections.

Mary Rich, the mother of slain DNC staffer Seth Rich, at a press conference. (Photo: Michael Robinson Chavez/The Washington Post via Getty Images)

Among the violent conspiracy theories cited in the May FBI document is one involving a man who thought Transportation Security Administration agents were part of a New World Order. Another focused on the High Frequency Active Auroral Research Program (HAARP), a government-funded facility in Alaska that has been linked to everything from death beams to mind control. The two men arrested in connection with HAARP were “stockpiling weapons, ammunition and other tactical gear in preparation to attack” the facility, believing it was being used “to control the weather and prevent humans from talking to God.”

Nate Snyder, who served as a Department of Homeland Security counterterrorism official during the Obama administration, said that the FBI appears to be applying the same radicalization analysis it employs against foreign terrorism, like the Islamic State group, which has recruited followers in the United States.

“The domestic violent extremists cited in the bulletin are using the same playbook that groups like ISIS and al-Qaida have used to inspire, recruit

and carry out attacks,” said Snyder, after reviewing a copy of the bulletin provided by Yahoo News. “You put out a bulletin and say this is the content they’re looking at — and it’s some guy saying he’s a religious cleric or philosopher — and then you look at the content, videos on YouTube, etc., that they are pushing and show how people in the U.S. might be radicalized by that content.”

Though the FBI document focuses on ideological motivations, FBI Director Wray, in his testimony last week, asserted that the FBI is concerned only with violence, not people’s beliefs. The FBI doesn’t “investigate ideology, no matter how repugnant,” he told lawmakers. “We investigate violence. And any extremist ideology, when it turns to violence, we are all over it. ... In the first three quarters of this year, we’ve had more domestic terrorism arrests than the prior year, and it’s about the same number of arrests as we have on the international terrorism side.”

Yet the proliferation of the extremist categories concerns Michael German, a former FBI agent and now a fellow with the Brennan Center for Justice’s Liberty & National Security program. “It’s part of the radicalization theory the FBI has promoted despite empirical studies that show it’s bogus,” he said.

German says this new category is a continuing part of FBI overreach. “They like the radicalization theory because it justifies mass surveillance,” he said. “If we know everyone who will do harm is coming from this particular community, mass surveillance is important. We keep broadening the number of communities we include in extremist categories.”

For Garrow, the historian, the FBI’s expansive definition has its roots in bureau paranoia that dates back decades. “I think it’s their starting point,” he said. “This goes all the way back to the Hoover era without question. They see ideology as a central motivating factor in human life, and they don’t see mental health issues as a major factor.”

Yet trying to label a specific belief system as prone to violence is problematic, he said.

“I don’t think most of us would do a good job in predicting what sort of wacky information could lead someone to violence, or not lead anyone to violence,” Garrow said. “Pizzagate would be a great example of that.”

Trump supporters displaying QAnon posters appeared at one of President Trump's Make America Great Again rallies in 2018. (Photo: Thomas O'Neill/NurPhoto via Getty Images)

While Trump may not be supportive of labeling a group like QAnon, which sees him as a hero, as extremist, he's in favor of broadening the number of organizations that are labeled as violent extremists, at least on the left. On Saturday, President Trump tweeted that Antifa, a far-left movement opposed to what it considers fascism, should be labeled a terrorist organization.

Snyder, the former Homeland Security official, agrees that conspiracy theories may in fact inspire violence and be a threat, but questions what the government is going to do about it.

He notes that at the Department of Homeland Security, “nearly all, if not all, the intelligence analysts focusing on domestic extremist groups” were eliminated under the Trump administration. “There is no one there doing this,” he said.

** Sharon Weinberger contributed reporting to this article.*

Exhibit 5

QAnoners Say Their QAnon Merch Is Being Banned By Secret Service at Trump Rallies

THE PLOT THICKENS

Fortunately, Q has a solution to the Trump rally ban: buy more QAnon T-shirts.



Will Sommer

Updated Oct. 02, 2018 3:11AM ET / Published Oct. 01, 2018 5:34PM ET



Leah Millis/Reuters

QAnon conspiracy theorists have begun sneaking their QAnon shirts into Trump rallies amid reports that people wearing the shirts have been turned away by people they claim are Secret Service officers staffing Trump events.

QAnon is founded on a series of anonymous clues posted online by a person named “Q” that purport to show a secret world where Trump is engaged in endless battle with a pedophile cabal of high-ranking Democrats and where Trump’s foes will soon be banished to Gitmo. It is an inherently ludicrous idea but one that’s managed to gain a ton of traction through Trump rallies, where attendees regularly show up with Q shirts and signs.

Indeed, the conspiracy theory jumped into the mainstream in July, when a number of people with QAnon shirts and signs were shown on TV at a Trump rally in Florida. Other QAnon supporters who get caught on camera at Trump rallies have earned cryptic shout-outs from Q, and believers in the theory scrutinize Trump’s hand gestures at rallies to claim he’s pointing to QAnon believers.

But now QAnon fans hoping for a viral moment of their own say they’re being told they can’t wear QAnon-related shirts to the Trump rallies. On Monday, a QAnon supporter trying to attend a rally the president was holding in Tennessee claimed on Twitter that a Secret Service agent told her that “Q” shirts weren’t allowed at the rally.



Maria Wall@MariaWall93

I was just told by the Secret Service that I cannot come inside the stadium wearing a shirt with a #Q on it. #wewilllisten #weareQ



4,720

1:01 PM - Oct 1, 2018

[Twitter Ads info and privacy](#)

4,086 people are talking about this

This isn't the first time QAnon supporters have claimed their gear is being banned at Trump events. Lisa Thornburg, a QAnon believer, told The Daily Beast that a Secret Service officer told her husband that he couldn't wear QAnon T-shirt to a Trump rally in West Virginia.



[ClevelandPatriot@LisaMThornburg](#)

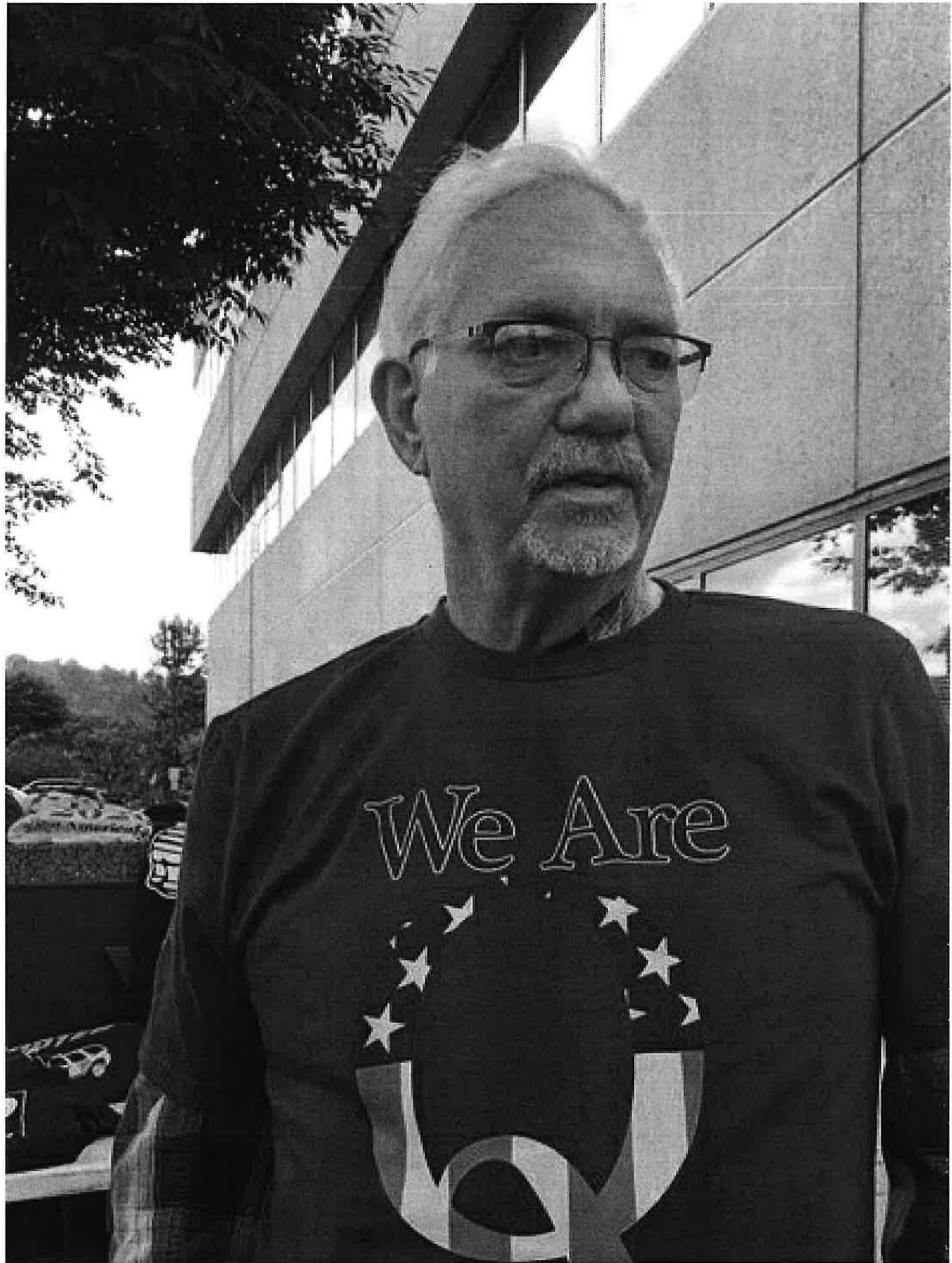
Secret Service made my husband take off his Q shirt. No matter! We know that we are



Patriots &

#trumprallywv #maga

!! #wwg1wga #qanon #weareq #patriotsfight



5

[3:44 PM - Sep 29, 2018](#)

[Twitter Ads info and privacy](#)

[See ClevelandPatriot's other Tweets](#)

But Thornburg still managed to show her QAnon support.

“I ended up holding the shirt up high and waving it during the rally so it could be seen,” Thornburg told The Daily Beast.

The Secret Service didn’t respond to requests for comment.

Other QAnon believers have started to get more creative, with one covering a shirt with a jacket in an attempt to get around the rally ban.



Will Sommer

[✓@willsommer](#)

· [Oct 1, 2018](#)

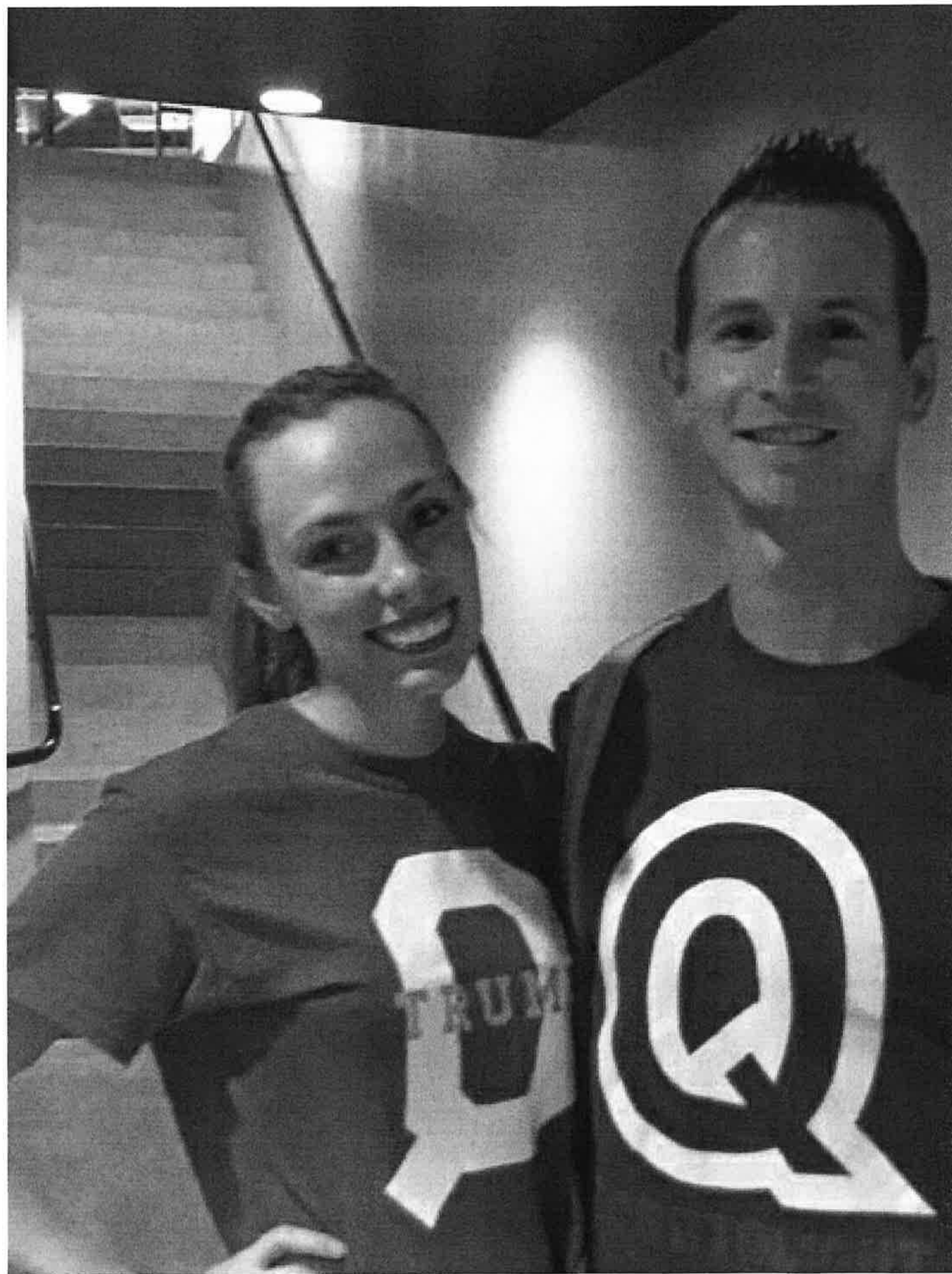
Replying to [@AMARLOW33](#) [@LizCrokin](#)

Hi Amanda, did they let you wear your shirt in? Thanks!



Amanda #darktolight@AMARLOW33

I just wore a light wind/rain coat over it and took it off once inside. The lines were insane. We barely made it in after waiting for almost 4 hours. It was great. Got several compliments on it.



2

[3:25 PM - Oct 1, 2018](#)

[Twitter Ads info and privacy](#)

[See Amanda #darktolight's other Tweets](#)

A ban on QAnon gear at Trump rallies would seem to conflict with the heart of the conspiracy theory, which is that Trump is communicating to his supporters with the anonymous clues that make up QAnon. But in a post, Q claimed that the shirts weren't being banned because they embarrass Trump—instead, they're banned because deep-state operatives posing as QAnon believers are calling in threats.

Either way, the mystery poster “Q” had a solution: just buy more QAnon shirts and wear it in layers.

Exhibit 6

Man who shot mob boss Francesco 'Franky Boy' Cali believed in QAnon, thought he had Trump's 'full support': Court docs

Anthony Comello has been arrested for and pleaded not guilty to murder.

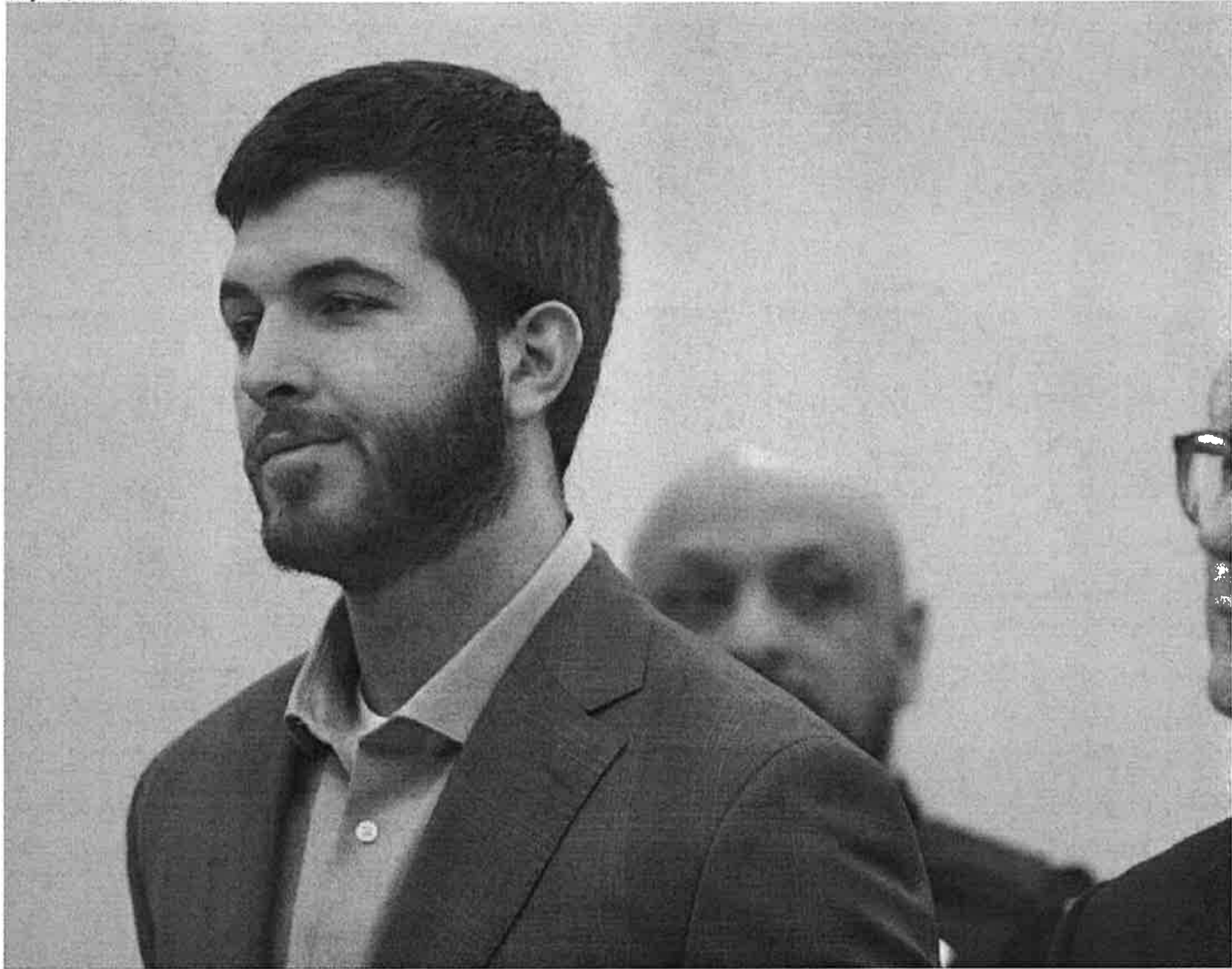
By

Meghan Keneally

And

Aaron Katersky

July 22, 2019, 3:36 PM



What is 'QAnon' and how the conspiracy theory gained mainstream attention*Melissa Dietrich and her husband David, who have their own online following, spoke to ABC News' "Nightline" about their beliefs.* Shira Stoll/AP, FILE

The man who is accused of fatally shooting a New York City mob boss in a brazen crime that shocked observers and the law enforcement community allegedly thought he had the protection of President Trump and was trying to

arrest the mob boss as part of a battle against the "Deep State," new court documents claim.

Anthony Comello is charged with the murder of Francesco "Franky Boy" Cali, the reputed head of the infamous Gambino crime family.

Authorities initially feared a possible mob war in the wake of Cali's shooting death in March, but later Comello, who has no known mob ties, was identified as the suspect. He has entered a not guilty plea to murder and weapons possession charges.

In new court documents submitted Friday, Comello's defense attorney details how his client -- who he is arguing suffers from mental defect -- allegedly was a believer in the "conspiratorial fringe right-wing political group" QAnon.

QAnon has found its way out of the recesses of the internet with references on Alex Jones' "InfoWars" and from celebrities like Roseanne Barr. Trump supporters were also spotted wearing "Q" T-shirts at rallies in June 2018. Then-press secretary Sarah Sanders said the "president condemns and denounces any group that would incite violence against another individual" in response to a question about QAnon.



Anthony Comello displays writing on his hand during his extradition hearing in Toms River, N.J., March 2019.
Anthony Comello, 2019. Slave Writing. On his hand during his extradition hearing in Toms River.

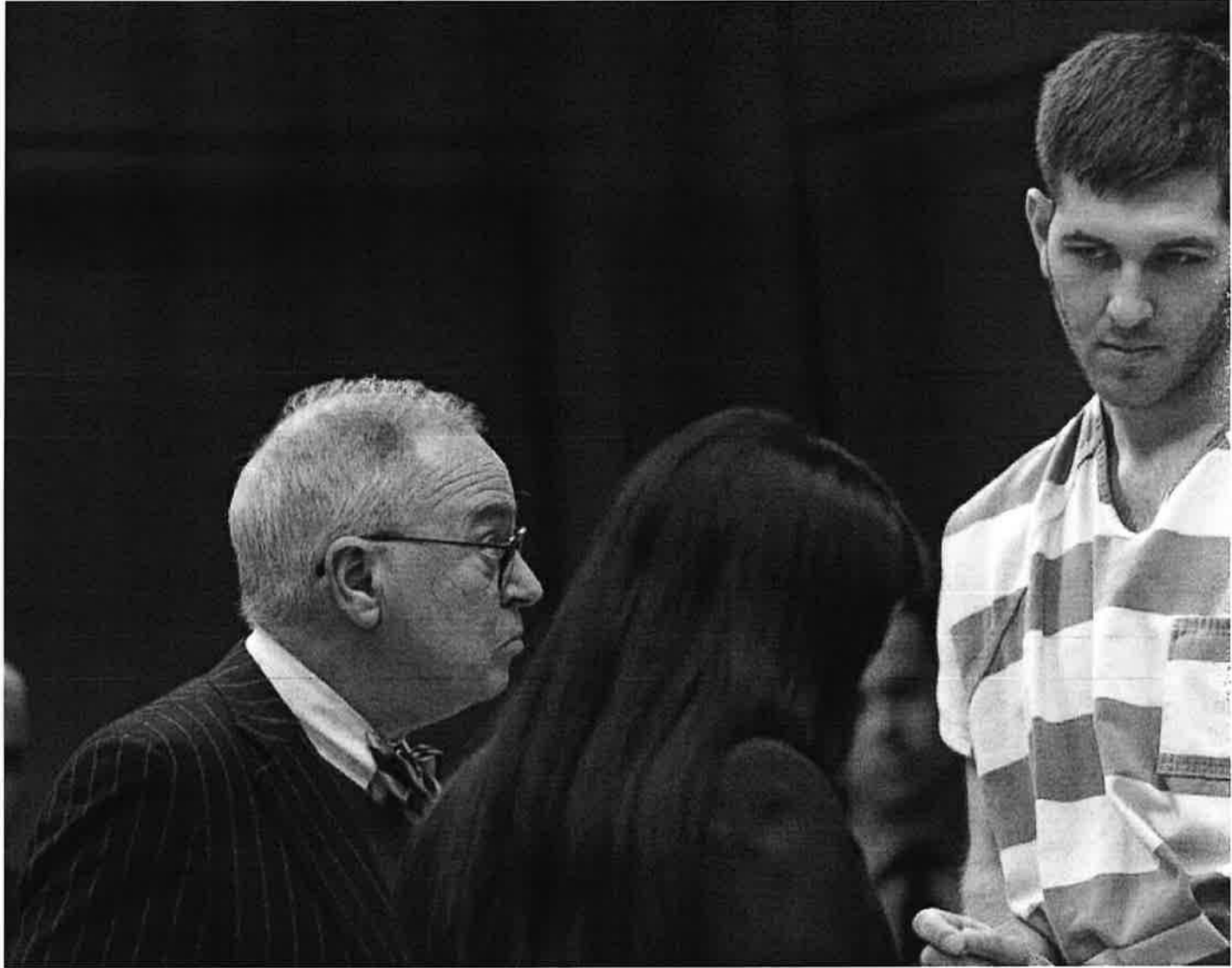
Comello's family "began to notice changes in his personality" following the presidential election in 2016, noting that he took an interest in politics, which was "something he had not previously been involved in," the court document states.

Comello allegedly "became increasingly vocal about his support for QAnon," about a month-and-a-half before Cali's murder, the documents state.

"But Mr. Comello's support for QAnon went beyond mere participation in a radical political organization, it evolved into a delusional obsession," the legal memorandum states.

According to the memo, QAnon follows the "postings of an individual (or group of individuals) who write using the pseudonym 'Q'." Devotees believe that there are people working in the so-called "Deep State" who are trying to ruin America and President Donald Trump and his supporters are battling against them.

"As part of his delusion, the defendant believed that he had been given secret knowledge about the Deep State, and that Q was communicating directly with him so that the defendant could play a grand role in the conflict to save the American way of life. Because of his self-perceived status in QAnon, Mr. Comello became certain that he was enjoying the protection of President Trump himself, and that he had the president's full support," the court document states.



~~Anthony Comello appears for his extradition hearing in Tom's River, N.J., March 18, 2019. Seth~~
Anthony Comello appears for his extradition hearing in Tom's River, N.J., March 18, 2019. Seth

His attorney's document notes how Comello tried to make citizen's arrests of three prominent politicians, all of whom are Democrats and vocal critics of Trump -- New York City mayor Bill de Blasio, and Representatives Maxine Waters and Adam Schiff. All three of those citizen's arrests, in February 2019 or shortly after, were unsuccessful.

In the de Blasio case, the mayor's security detail thwarted him and in the case with the members of Congress, U.S. Marshals did not help him, which

Comello allegedly believed they would. His lawyer said Comello believed de Blasio was guilty of "election fraud" and the two members of Congress were "guilty of breaking the law."

Comello allegedly intended to perform another attempted citizen's arrest when he went to confront Cali as well, but the incident escalated, according to the court document.

"In addition to politicians and celebrities, Mr. Comello concluded that the Deep State also includes individuals associated with organized crime. He ardently believed that Francesco Cali, a boss in the Gambino Crime Family, was a prominent member of the Deep State, and, accordingly, an appropriate target for a citizen's arrest," the memorandum states.

The documents detail how Comello drove to Cali's Staten Island home on March 13 and "struck" the mob boss's car which was parked outside of the residence.

The noise apparently prompted Cali to leave the house and speak to Comello about the damage to the car.

"While the two men were standing near their respective vehicles, Mr. Comello informed Mr. Cali of his true intention to effect a citizen's arrest, and ordered Mr. Cali to submit to detention," the document states, adding that Comello "brought handcuffs with him, and planned to restrain Mr. Cali and bring him to the appropriate authorities to answer for the criminal actions which Mr. Comello believed he had taken part in."

"After a heated exchange, Mr. Cali made a furtive action with his hand and Mr. Comello became afraid for his life. He reached into his vehicle, withdrew his gun, and shot Mr. Cali in self-defense," the document states.

Comello's defense attorney has already submitted a notice of intent to show evidence of mental disease or defect, the documents state.

"Had Mr. Comello simply intended to lure Mr. Cali out of his house and murder him, there would have been no need to bring any elements of restraint," the document states. "The presence of these handcuffs demonstrates that Mr. Comello was actually planning to effect a citizen's arrest on Mr. Cali, rather than shoot him."

A judge denied Comello's attorney's request for bail in May.

The documents were filed in connection to a request for specific pieces of evidence to be submitted as discovery, and the next court appearance is slated for Aug. 13.

Exhibit 7

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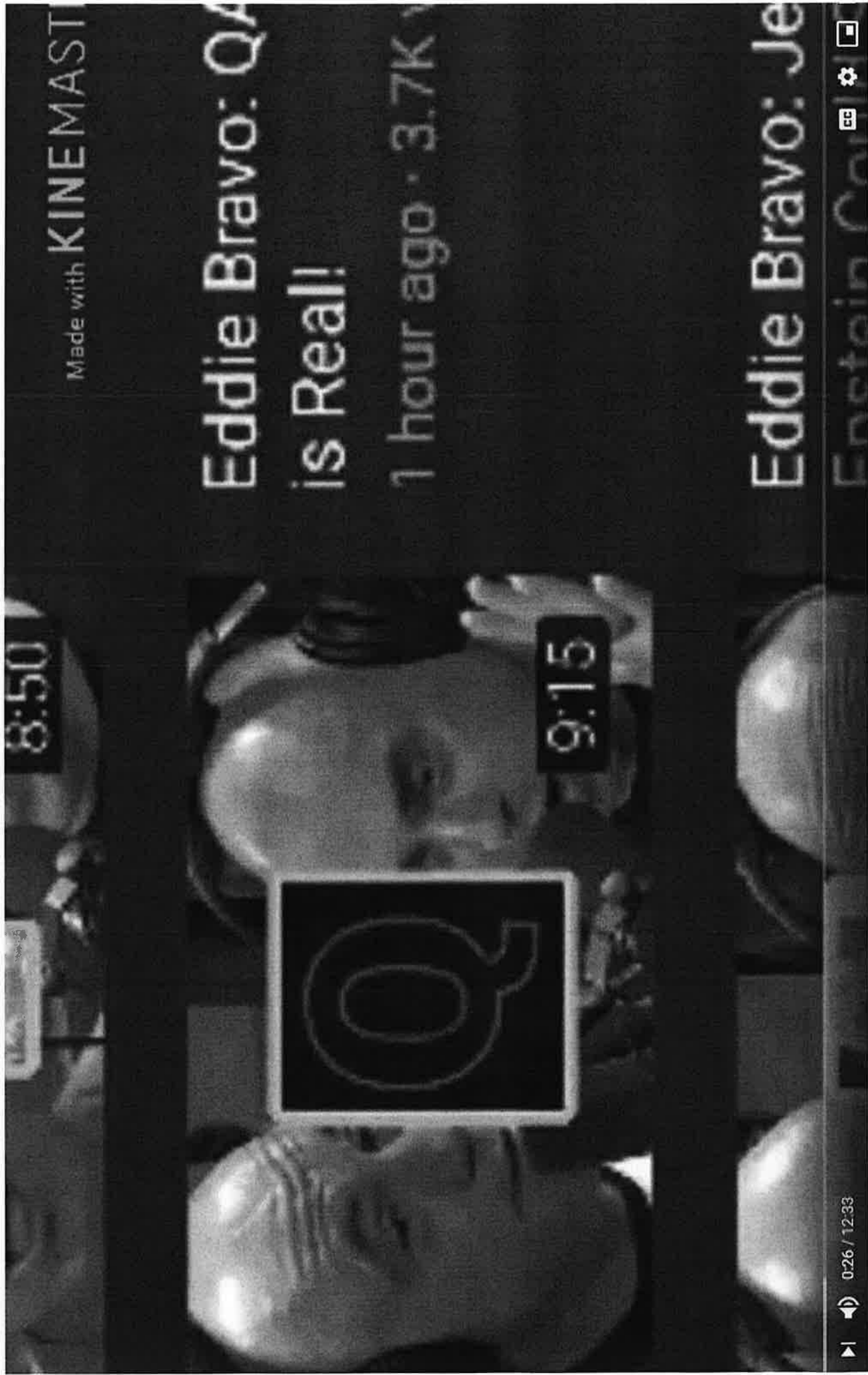
PLAY ALL



KOBE BRYANT HELICOPTER DEATH PREDICTED BY COMEDY CENTRAL CARTOON. WE ALREADY KNEW CARTELEERS; #TGBTG
112K views • 1 week ago

Well would ya look at that! Times up Kobe! #NODEALS #WWG1WGA #TGBTG

Exhibit 8



▶ 🔊 0:26 / 12:33

📺 ⚙️

3 #WWG1WGA #THEGREATAWAKENING #17 #91317 #TRUMP2020 #KEK #KAG #MAGA #JOEROGAN #THEWAKEONE

📅 Jan 10, 2020

👍 8 🗨️ 0 ➦ SHARE

☰ SA

Exhibit 9

Exhibit 9

Since Jacquez was served with Complaint on January 4th, 2020:

YouTube Channel #1:

AN ALL AMERICAN CARTEL LLC

<https://www.youtube.com/channel/UC7vSHfavURv7WtvyoAkRW2g/videos>

<http://archive.ph/bSiUK>

1. **Title:** Isaac Kappy DEFANGO Steve Outtrim Thoughts about Gabe

Date: January 13, 2020

https://www.youtube.com/watch?v=650ic16pF_M&t=2s

<http://archive.is/fi01b>

Comments: In which video clips of various obscenities are screamed at Gabe Hoffman; described in #29 of Motion For Injunctive Relief.

Description: “Mirrored From Grabber Babe!” (video copied from YouTube channel of Thomas Schoenberger’s with anti-Semitic name “Grabber Babe” targeting me)

“Grabber Babe” YouTube channel owned and operated by Schoenberger, who I am suing for defamation:

https://www.youtube.com/channel/UCv_bTwS5idLh3iqqWXCEs8g/videos

video link: <https://www.youtube.com/watch?v=CpotE9S3Iz0>

2. **Title:** BEWARE THE MAN THAT HAS NOTHING TO LOSE! NEVER STOP THE EMENY FROM FROM DESTROYING ITSELF #DINGDING

Date: Jan 11, 2020

https://www.youtube.com/watch?v=MfA8IgNa_yo

<http://archive.ph/hPxUy>

3. **Title:** THIS CASE WAS OVER BEFORE IT EVEN BEGAN! LET ME HAVE YOUR COMPANY GABE HOFFMAN LOL #LULZ #TGBTG

Date: Jan 9, 2020

<https://www.youtube.com/watch?v=dhEVRnoeVhU&t=15s>

<http://archive.ph/AiI2G>

Comments: Described in #23 of Motion For Injunctive Relief

4. **Title:** GABE HOFFMAN

Date: January 9, 2020

<https://www.youtube.com/watch?v=-ZT6I7viis0&t=380s>

<http://archive.ph/1IEo4>

Comments: Described in #22 of Motion For Injunctive Relief

5. **Title:** Michael Dade Gabe Hoffman in legal Trouble? Isaac Kappy Smiling From Heaven? #WWG1WGA #TGBTG

Date: January 9, 2020

https://www.youtube.com/watch?v=0FnH_wMw0-E&t=1s

<http://archive.ph/BtRQ0>

Comments: Described in #24 of Motion For Injunctive Relief

6. **Title:** GABE HOFFMAN ISAAC KAPPY SETH GREEN STEPHEN SPIELBERG QANON EPSTEIN AND MUCH MORE #WWG1WGA #TGBTG

Date: Jan 8, 2020

<https://www.youtube.com/watch?v=9BYSdnTAk3s&t=1s>

<http://archive.ph/u3Ev7>

Comments: Described in #25 of Motion For Injunctive Relief, in which Jacquez claims his case “this is really big stuff, it involves... the Jewish mob, the Jewish mafia, which is very scary for me, you know, I sleep with my gun every night, nice and tight:

7. **Title:** I’m Back and am now being sued by Gabe Hoffman! More to come soon!

Date: January 8, 2020

<https://www.youtube.com/watch?v=YngRWkQHlU0>

<http://archive.ph/0EdVh>

8. **Title:** Isaac Kappy’s Number 1 Investigative Journalist? Phoenix and Defango ignore AAAC? #WWG1WGA #TGBTG

Date: January 26, 2020

<https://www.youtube.com/watch?v=jSDYQdqaTc0>

<http://archive.is/cDgwx>

Comments: At 8:10 displays image of prior defamatory video with text reading “So the murder was done by Harvey Levin and Gabe Hoffman, They paid a guy named Craig Sayer and a guy named Daniel Ryan Doud to kidnap and then...”

9. **Title:** Heather O’Rourke MURDERED? CONSPIRACY THEORY ON WHAT EXACTLY HAPPENED TO HEATHER FROM POLTERGEIST
Date: February 5, 2020

<https://www.youtube.com/watch?v=A6Hw3wL4GQ4>

Comments: Heather O’Rourke was the child actress that appeared in the famous Steven Spielberg movie, “Poltergeist.” JACQUEZ defames HOFFMAN by stating that HOFFMAN is covering up for Steven Spielberg who according to JACQUEZ, was involved in the death of O’Rourke at the age of 12. O’Rourke, died over 30 years ago, from a sepsis infection, due to a perforated intestine, which was found to be due to a congenital defect in her intestinal tract.

YouTube Channel #2:

AN ALL-AMERICAN CARTEL L.L.C.

https://www.youtube.com/channel/Ucc02fyIImLd2XUCCxp-t_GA/videos

<http://archive.ph/62FM4>

1. **Title:** ISAAC KAPPY STILL HAS PEOPLE FIGHTING FOR HIM AND HIS CAUSE. HE DIDN’T DIE, HE MULTIPLIED! # KAPPY
Date: January 13, 2020

Comments: Copy of Video #1 on Channel #1 listed above – in which video clips of various obscenities are screamed at Gabe Hoffman

<https://www.youtube.com/watch?v=HH3SRW5qces>

<http://archive.ph/UXWwJ>

2. **Title:** ISAAC KAPPY SAYS HELLO! THANKS ALI ALEXANDER FOR THE FOOTPRINTS IN THE SNOW. THANKQ #TGBTG
Date: January 9, 2020

Comments: Copy of video #3 on Channel #1 listed above

<https://www.youtube.com/watch?v=enxLBK7Xr6w>
<http://archive.ph/l48OL>

3. **Title:** GABE HOFFMAN
Date: January 9, 2020

Comments: Copy of Video # 4 on Channel #1 listed above

<https://www.youtube.com/watch?v=Jlwu0DokINQ>
<http://archive.ph/jG511>

4. **Title:** Gabe Hoffman and Michael Dade in LEGAL trouble? Will An All American Cartel Relent? #TGBTG
Date: January 9, 2020

Comments: Copy of Video # 5 on Channel #1 listed above

<https://www.youtube.com/watch?v=eBlxCijFlkk>
<http://archive.ph/16kkR>

5. **Title:** HELP TAKE GABE HOFFMAN OF AN OPEN SECRET DOWN BY HELPING ME TAKE HIM TO COURT TO TALK ABOUT KAPPY
Date: January 8, 2020

Comments: Copy of Video # 7 on Channel #1 listed above

<https://www.youtube.com/watch?v=XiDw7oMJgM>
<http://archive.ph/Av9HK>

6. **Title:** Open Secret Gabe Hoffman suing me for millions? ISAAC KAPPY QANON SPEIELBERG SETH GREEN JEWISH MOB
Date: January 8, 2020

Comments: Copy of Video #6 on Channel #1 listed above

<https://www.youtube.com/watch?v=4iI0uia8F00>
<http://archive.ph/6xVYT>

Note: In this version of the video, Jacquez writes in the description: “I’m super scared y’all! If I die! Y’all already know! I did it for the children!” and posts a request for donations, along with his PayPal address

(see archive link for image)

Facebook posts to defamatory videos:

Page: <https://www.facebook.com/iamlizard>

1. **Date:** January 24, 2020

Jacquez posted link to defamatory Video #6 on Channel #2 listed above
<https://www.facebook.com/iamlizard/posts/1365508150318394>
<http://archive.ph/HjEID>

2. **Date:** January 13, 2020

Jacquez posted link to defamatory Video #1 on Channel #1 listed above
<https://www.facebook.com/iamlizard/posts/1355915347944341>
<http://archive.ph/8xXAZ>

3. **Date:** January 13, 2020

Jacquez writes “This is the guy suing me!” with Gabe Hoffman picture displayed in the video post on Facebook
<https://www.facebook.com/iamlizard/posts/1355874181281791>
<http://archive.ph/GdQ1x>

Jacquez posted link to copy of defamatory Video #1 on Channel #1 listed above, posted to Thomas Schoenberger channel “Grabber Babe”

<https://www.youtube.com/watch?v=CpotE9S3Iz0&feature=share&fbclid=IwAR37NyCuGpX9-9ZPI2E1fRxYZ0kctcZPIBFUksRBS8tVUNKyEpQ7z7g83sGQ>
<http://archive.ph/FU7Xb>

4. **Date:** January 11, 2020

Jacquez posted link to defamatory Video #2 on Channel #1 listed above

<https://www.facebook.com/iamlizard/posts/1353693698166506>
<http://archive.ph/EzJR8>

5. **Date:** January 10, 2020

Jacquez posts the Complaint, my picture, and writes: “This is some of the Documents and evidence im going over. Let me know if you can HELP

Tag anyone that might be able to help. Im getting ahold of the FBI because this has to stop! This guy is blatantly and flagrantly out of control and the Palm Beach Courts must be to if they allow this kind of nonsense”

<https://www.facebook.com/iamlizard/posts/1352529678282908>
<http://archive.ph/N6aL0>

6. **Date:** January 10, 2020

Jacquez posted link to defamatory video from October 14, 2019 (described in Amended Complaint #33), in which Gabe Hoffman is accused of involvement in Jacquez’ imagined murder of Isaac Kappy

Jacquez writes “Again? What did I say? LULZ? Such a frivolous complaint”

<https://www.facebook.com/iamlizard/posts/1351994065003136>
<http://archive.ph/iD5at>

Video Link:

<https://www.youtube.com/watch?v=RPnu-klMveY&feature=share&fbclid=IwAR0csu64LPtmj0chstzeTsBxUesN-KWzfV2FyGemIXbBRKsPS3JCzfolpk0>

<http://archive.ph/XCBFS>

7. **Date:** January 10, 2020

Jacquez posted link to defamatory video from October 14, 2019 (described in Amended Complaint #29)

Jacquez writes: “Did yall here any defamatory statements from me?”

<https://www.facebook.com/iamlizard/posts/1351992751669934>
<http://archive.ph/1uwEi>

The video thumbnail visible on the Facebook post states: “He is a pedo protector, He hides most of his funds in the Caymans. It’s the Jew money from Hollywood porno outfits and it includes child porn.

Gabes birth name is Kleyn Pots !!!! He will hate you if you say that on air he he”

<https://www.youtube.com/watch?v=zp5rH5beJbo&feature=share&fbclid=IwAR1LvrzuS-EdAAzmFVea12GAkrxteCsMPKl4stxuiJetKljaf-DP2NgJAR4>
<http://archive.ph/DDNbY>

8. **Date:** January 10, 2020

Jacquez posted link to defamatory video from October 11, 2019 (described in Amended Complaint #31)

Jacquez writes, in part “This is what im getting sued over”

The video thumbnail visible in the Facebook post displays the defamatory title “An Open Secret or Gabe Hoffman killed Isaac Kappy?”

<https://www.facebook.com/iamlizard/posts/1351991911670018>
<http://archive.ph/303xF>

<https://www.youtube.com/watch?v=MY6rzvFtRrk&feature=share&fbclid=IwAR2T78j12cMzB6GZHLp0MerhQWhc6P0dP9LZENXsvyqhUGq-GbYgfaVJzp4>
<http://archive.ph/AW01S>

9. **Date:** January 10, 2020

Jacquez posted link to defamatory Video #2 on Channel #2 listed above

<https://www.facebook.com/iamlizard/posts/1351916101677599>
<http://archive.ph/Mqh9v>

10. **Date:** January 9, 2020

Jacquez posted link to defamatory Video #5 on Channel #1 listed above

<https://www.facebook.com/iamlizard/posts/1351665585035984>

<http://archive.ph/1sLbc>

11. **Date:** January 8, 2020

Jacquez posted link to defamatory Video #6 on Channel #2 listed above.

Jacquez tagged 46 other people in his post, ensuring they all receive notification.

Jacquez writes: "I'm an Anon that is being persecuted for being apart of the QANON community!

Please help this poor disabled father of three out against this frivolous lawsuit thays full of deception and straight out lies!"

<https://www.facebook.com/iamlizard/posts/1350667835135759>

<http://archive.ph/WZn34>

12. **Date:** January 8, 2020

Jacquez posted link to defamatory Video #6 on Channel #2 listed above

Jacquez tagged 48 other people in his post, ensuring they all receive notification.

Jacquez writes: "Please get the word out Anons!

If they can attack me thia way, they can you if you say THINGS they dont like! Even if you are just the messenger.

#ANONHELP

#WWG1WGA

#FORGODANDCOUNTRY"

#WWG1WGA is the main QAnon mantra

<https://www.facebook.com/iamlizard/posts/1350666158469260>

<http://archive.ph/SXdOV>

13. **Date:** January 8, 2020

Jacquez posted link to defamatory Video #6 on Channel #2 listed above.

Jacquez tagged 45 other people in his post, ensuring they all receive notification.

Jacquez writes: "Please Share and get the word out anons!
Im under attack for being an Anon and a truther for seeking the truth!
To God Be The Glory y'all!
Prayers"

<https://www.facebook.com/iamlizard/posts/1350664695136073>
<http://archive.ph/xbOnZ>

14. **Date:** January 8, 2020

Jacquez posted link to defamatory Video #6 on Channel #2 listed above.

Jacquez tagged 47 other people in his post, ensuring they all receive notification.

Hoffman's picture is visible in the thumbnail of the video, which is displayed in the Facebook post.

Jacquez writes: "Jewish Mob may or may not be after me for being an Anon and or Jewish Hollywood.

Not sure. If you are for the cause help me out and fight this hedge fund manager! He may or may not be bigger then Epstein and is trying to silence me in regards to isaac kappy and much more by filing expensive fraudulent lawsuits designed to over power and overwhelm.

All towards my little channel.

What was it i said that scared them!"

<https://www.facebook.com/iamlizard/posts/1350663515136191>
<http://archive.ph/4Pj5l>

15. **Date:** January 8, 2020

Jacquez posted link to defamatory Video #6 on Channel #2 listed above.

Jacquez writes: "#WWG1WGA
WE ARE UNDER ATTACK!
#OVERTHETARGET"

#WWG1WGA is the main QAnon mantra

<https://www.facebook.com/iamlizard/posts/1350660791803130>
<http://archive.ph/lyhZD>

16. **Date:** January 8, 2020

Jacquez posted link to defamatory Video #6 on Channel #2 listed above.

Jacquez tagged 34 other people in his post, ensuring they all receive notification.

Jacquez writes: “For The Cause”

<https://www.facebook.com/iamlizard/posts/1350660425136500>
<http://archive.ph/YKdx0>

17. **Date:** January 8, 2020

Jacquez posted link to defamatory Video #6 on Channel #2 listed above.

Jacquez tagged 38 other people in his post, ensuring they all receive notification.

Jacquez writes: “Urgently need your help!” #WWG1WGA”

#WWG1WGA is the main QAnon mantra

<https://www.facebook.com/iamlizard/posts/1350659505136592>
<http://archive.ph/kDuwt>

18. **Date:** January 8, 2020

Jacquez posted link to defamatory Video #5 on Channel #2 listed above.

<https://www.facebook.com/iamlizard/posts/1350615238474352>
<http://archive.ph/mRilu>

19. **Date:** January 8, 2020

Jacquez posted link to defamatory Facebook Fundraiser he created for defense of the Complaint by Hoffman, claiming that includes “prosecution of Hoffman”, presumably for the imagined crimes Jacquez has maliciously defamed Hoffman for having committed

<https://www.facebook.com/iamlizard/posts/1350603921808817>
<http://archive.ph/TNR5N>

In the Fundraiser post on Facebook, Jacquez writes, in part:

“The lawyers i talked to in Florida called the Anderson Law Group says it will cost 100,000 thousand to see this case through to the end which includes prosecution of Gabe Hoffman.”

<https://www.facebook.com/donate/554479015143628/>
<http://archive.ph/lkAYa>

20. **Date:** January 8, 2020

Jacquez posted link to Facebook Fundraiser he created, which defames Hoffman, as described in #18 above

<https://www.facebook.com/iamlizard/posts/1350602108475665>
<http://archive.ph/5049L>

21. **Date:** January 8, 2020

Jacquez posted link to defamatory Video #6 on Channel #2 listed above.

<https://www.facebook.com/iamlizard/posts/1350515681817641>
<http://archive.ph/ui1t4>

Twitter:

1) From @infinitytozero Jacquez posted link to defamatory Video #8 on Channel #1 listed above:

Jacquez also operates the Twitter account @an_cartel

Date: January 26, 2020

<https://twitter.com/infinitytozero/status/1221429358167875585?s=20>
<http://archive.ph/37Jag>

2) **Date:** February 5, 2020

<https://twitter.com/infinitytozero/status/1225074605284446209?s=20>

This includes 6 posts with links to a detestable video (YouTube Channel #1, item 9 above) on Facebook and 4 tweets (including this one), which specifically targets and tags HOFFMAN and his film on Twitter.