

Exhibit A - Affidavit of Nathan Bernard

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
PALM BEACH COUNTY DIVISION

ILLOOMINATE MEDIA, INC., <i>et al</i> ,)	
)	Case No. 9:19-cv-81179-RAR
)	
Plaintiffs,)	
)	
v.)	
)	
CAIR FLORIDA, INC., <i>et al</i> ,)	
)	
)	
Defendants.)	

AFFIDAVIT OF NATHAN T. BERNARD

I, Nathan T. Bernard, swear under the penalty of perjury that the following facts are true to the best of my knowledge, information, and belief:

1. I have personal knowledge of the facts set forth below. If I were called as a witness, I could competently testify about what I have written in this declaration.

2. I am Founder at Bernard Media.

3. In 2018, I and Chris Gillen pulled a prank on Laura Loomer to convince her that her banning was caused by media and advocacy organizations, including CAIR Foundation.

4. I have reviewed the attached article published by Jared Holt in Right Wing Watch. I, along with Chris Gillen, have full personal knowledge of all the facts contained in the article. They are all true. I adopt the entire article as my own personal statement.

5. To be clear, the story is true, but CAIR Foundation's involvement is fictitious. CAIR Foundation's involvement was something Chris and I made up. CAIR Foundation had no actual involvement with Twitter as far as I know.

6. I did not cooperate with CAIR Foundation or discuss my actions with CAIR Foundation or any agent, affiliate, or employee of CAIR Foundation in any way prior to April 18, 2019, which I understand to be when this lawsuit was first filed in state court.

7. I have reviewed all of the documents published in the Right Wing Watch article, including texts from Loomer and a fake calendar that Chris Gillen sent to Loomer.

8. I have seen those texts personally, they are all accurate and were sent from Laura Loomer's phone. They are consistent with everything that Loomer has personally told myself and Chris.

9. The google calendar is also true and accurate in that, as the Right Wing Watch article describes, it is not an actual schedule of Twitter CEO Jack Dorsey but something Chris and I created to fool Loomer.

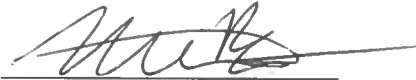
10. As the article accurately describes, Loomer told us that she had no information about CAIR's (in fact, nonexistent) involvement in Twitter banning her other than through Chris and myself.

11. Neither Chris nor I mentioned CAIR-Florida at all to Loomer or suggested the involvement of either CAIR-Florida or any other CAIR chapter in any

way. The only CAIR-related entity we "blamed" for her banning was the national CAIR entity generally, which I now know to be known as CAIR Foundation.

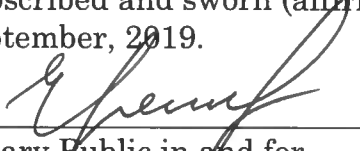
I swear under penalty of perjury that the foregoing is true and correct.

Executed on September 6th, 2019 in Windham, Maine.

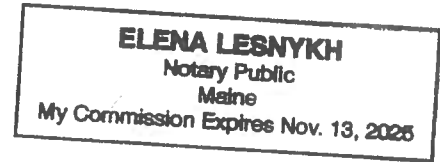


Nathan T. Bernard

Subscribed and sworn (affirmed) before me, Nathan T. Bernard this 6th day of September, 2019.



Notary Public in and for
The State of Maine
County of Cumberland
My commission Expires: 11.13.2025



Holt Article

MENU

Did the Wall Street Journal Fall for a Prank Directed at Laura Loomer?



<https://www.rightwingwatch.org/post_author/jared-holt/> By Jared Holt <https://www.rightwingwatch.org/post_author/jared-holt/> | January 15, 2019 4:01 pm



(Composite Image, Right Wing Watch)

Laura Loomer, who operated as an anti-Muslim online activist before she was suspended permanently from Twitter, was duped by internet pranksters into believing that her suspension occurred due to alleged lobbying by the Council on American-Islamic Relations (CAIR), a Muslim civil rights group in America.

Loomer then apparently took that claim to The Wall Street Journal, which by conflating Twitter's normal complaint mechanisms with the advisory capacity enjoyed by some advocacy groups with social media platforms, helped to advance the false narrative that CAIR was the power behind Loomer's ouster from the Twittersphere—despite denials by both CAIR and Twitter that any meetings or lobbying for Loomer's suspension had taken place between the two entities.

In a long-form report on the involvement of advocacy groups on advisory panels to social media companies, Journal reporters Kirsten Grind and John D. McKinnon appear to have represented a user complaint made against Loomer through CAIR employees' Twitter accounts as evidence of the group's influence over Twitter executives when they decided to shut down Loomer's account.

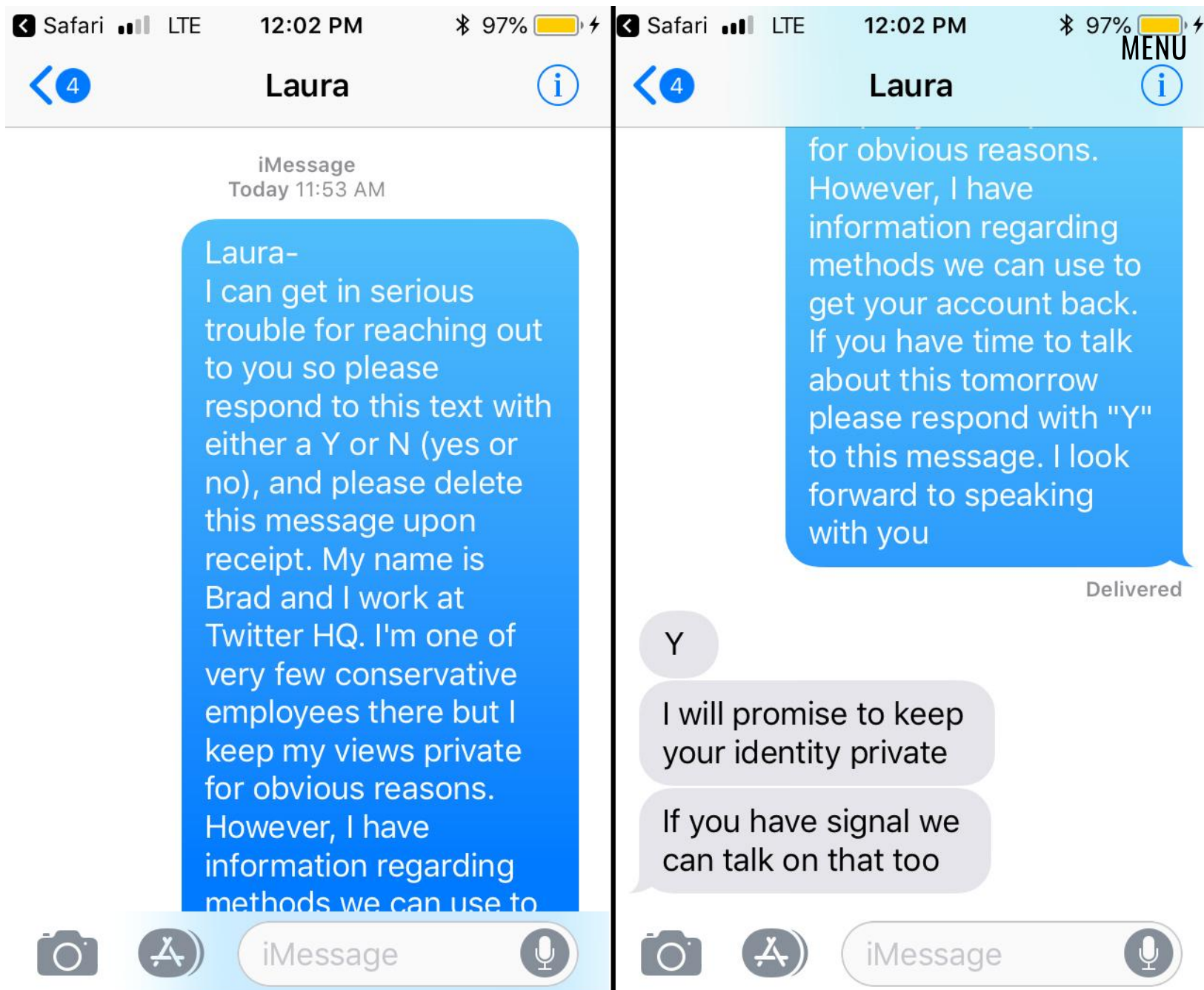
Following her tenure with James O'Keefe's Project Veritas operation, Loomer first gained internet fame in pro-Trump circles by disrupting <https://www.newyorker.com/news/news-desk/behind-the-scenes-with-the-right-wing-activist-who-crashed-julius-caesar-laura-loomer> a 2017 New York City production of Shakespeare's "Julius Caesar" that depicted the story's title character, who is dramatically stabbed to death in the middle of the play, costumed as a parody of President Donald Trump. Loomer had gathered more than a quarter-million Twitter followers before she was suspended from [t https://www.nbcnews.com/tech/security/laura-loomer-banned-twitter-after-criticizing-ilhan-omar-n939256](https://www.nbcnews.com/tech/security/laura-loomer-banned-twitter-after-criticizing-ilhan-omar-n939256) the social media platform [late last year after](https://www.nbcnews.com/tech/security/laura-loomer-banned-twitter-after-criticizing-ilhan-omar-n939256) multiple violations of Twitter's community guidelines against hate speech, including posts in which she targeted Muslims. Since then, she has gained brief flashes [of viral attention](https://www.theverge.com/2018/11/29/18118529/far-right-activist-laura-loomer-twitter-protest-handcuff-nyc-hq)

when she handcuffed herself to a door at Twitter's New York City offices in November to protest her suspension and when she hopped a fence yesterday <<https://www.newsweek.com/right-wing-activist-laura-loomer-nancy-pelosi-house-1291083>> at House Speaker Nancy Pelosi's California home.

After Loomer's handcuffing stunt, Nathan Bernard <<https://www.rollingstone.com/culture/culture-features/nathan-bernard-meet-the-man-trolling-the-alt-right-on-twitter-702455/>> and his associates, who say they seek to rile up and expose right-wing figures through a media operation they've dubbed "Bernard Media," got to work devising a prank in which they would pose as a Twitter employee named Brad and seek to convince Loomer that "Brad" could help get her account reinstated. As the prank wore on and Loomer continued communicating with Bernard and his friends, they devised a plan to see how hard it would be to play off her anti-Muslim attitudes and convince her that Muslim groups were directly responsible for her suspension. Since December, Bernard and his friends exchanged hundreds of text messages with Loomer and spoke with her on the phone for nearly a half-hour, a conversation in which they offered deadpan confirmations of all conspiracy theories Loomer suggested to them about Muslim groups' responsibility for her suspension. They even sent her a fabricated appointment calendar they said showed Twitter CEO Jack Dorsey's schedule, and it included a notation for a meeting with CAIR on a date just days before Loomer's suspension from the platform.

When the Wall Street Journal published a story last week in which reporters repeated Loomer's claims about what she said was CAIR's role in her Twitter suspension, Bernard and his associates shared details of their prank with Right Wing Watch.

Bernard's friend Chris Gillen, who goes by @steak_ham <https://twitter.com/steak_ham> on Twitter, first reached out to Loomer as "Brad" from his cell phone:





<<https://www.rightwingwatch.org/post/did-the-wall-street-journal-fall-for-a-prank-directed-at-laura-loomer/>screenshot-1/>

Chris Gillen reaches out to Laura Loomer purporting to be a Twitter employee named “Brad” who offered to help Loomer get her Twitter account restored.

“She didn’t verify who I am once. Never did she make an attempt,” Gillen said. “Everything I gave her as ‘info,’ she took as gospel. She hasn’t batted an eye or questioned anything that I said, ever.”

In a recorded phone call Bernard shared with us, Loomer expressed her willingness to leverage all means possible to retaliate against Twitter.

“I’m down with anything, honestly. So if whistle-blowers like yourself just want to come to me—I mean, I’m looking to escalate this as much as I can. I don’t even care. The gloves are off right now. [Twitter CEO Jack Dorsey] is banning people simply because they’re conservative. ... He is taking money from all these Muslims and implementing Sharia law,” Loomer told Gillen during a phone call.

Bernard told Right Wing Watch that the goal of their stunt was to see if Loomer would go on-air at Alex Jones’ Infowars and repeat what they had told her, after which they planned to reveal the details of their joke in order to make a point about what they said were Loomer’s and Infowars’ non-existent journalistic standards and confirmation bias.

But something else happened.

“Don’t worry it will be big,” Loomer wrote to the pranksters in a December text message. “I have a big network of journalists I know.”

WSJ Got 'LOOMERED'

MENU



loomered • Follow

loomered I'm watching you @jack.

Load more comments

- bryan3569 Beautiful. ♡
- drnicholasl @loomered I Honor Your Life and Intelligence !!!! ♡
- shawnski184 Stunning ♡
- bob.benavides.16 Live the look ♡



3,830 likes

<<https://www.rightwingwatch.org/post/did-the-wall-street-journal-fall-for-a-prank-directed-at-laura-loomer/loomer-instagram/>>
The day that Nathan Bernard and his squadron of pranksters first contacted Laura Loomer, she posted a message to Twitter CEO Jack Dorsey on Instagram: "I'm watching you." (Screenshot / Instagram)

The Wall Street Journal published a story on January 8 about Facebook's and Twitter's conversations with political advocates regarding the moderation of political discourse on their respective social media platforms. (The story appeared in the January 9 edition of the print paper.) In the story, the authors reported that Loomer had learned that "outside groups and individuals had privately lobbied

Twitter executives” to have her removed from the platform. The story does not state from what sources Loomer had gleaned that purported bit of intelligence, nor does it offer corroborating evidence of her claim. MENU

Noting that other groups had voiced similar complaints about Loomer, the Journal reporters wrote that they had confirmed with CAIR Executive Director Zahra Billoo that she had complained about Loomer’s presence on the website before, but failed to state the means by which Billoo said she had made her complaint: the mechanisms for such complaints that Twitter provides to every user. Twitter spokesperson Brandon Borrman told the Wall Street Journal that Loomer’s suspension “was the result of multiple, repeated violations of the same rules,” adding that “it was not about any one tweet.” A number of individuals and groups had complained about Loomer’s account, he told the paper.

The Wall Street Journal <<https://www.wsj.com/articles/facebook-twitter-solicit-outside-groups-often-on-the-right-to-referee-political-speech-11546966779>> reported:

Conservative Jewish activist Laura Loomer says she didn't know until recently that outside groups and individuals had privately lobbied Twitter executives to remove her from the site in late November.

In an email to Ms. Loomer, Twitter said she had violated its hateful conduct policy for a tweet calling Ilhan Omar, the Muslim congresswoman from Minnesota, anti-Jewish and supportive of Shariah law. In an interview, Ms. Loomer says she was referring to a 2012 tweet from Ms. Omar in which the congresswoman wrote, "may Allah awaken the people and help them see the evil doings of Israel."

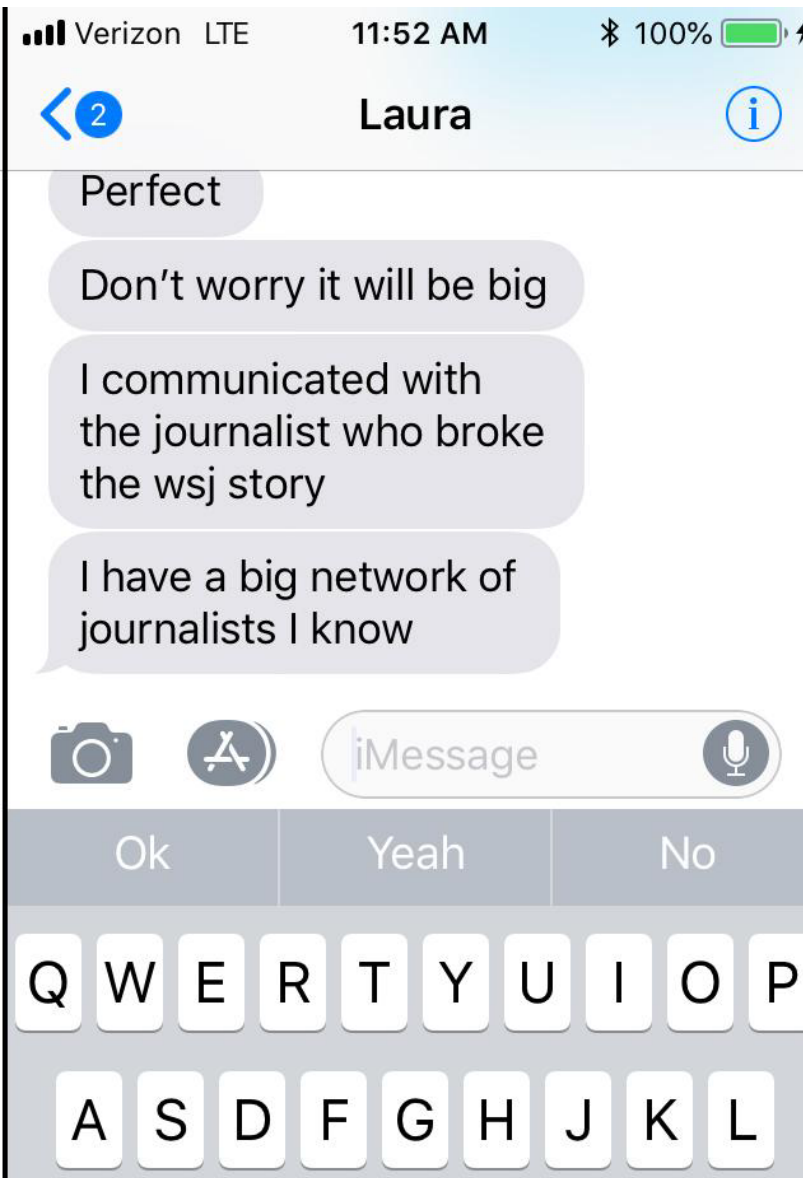
Among the groups that had complained to Twitter was the Council on American-Islamic Relations, an advocacy organization.

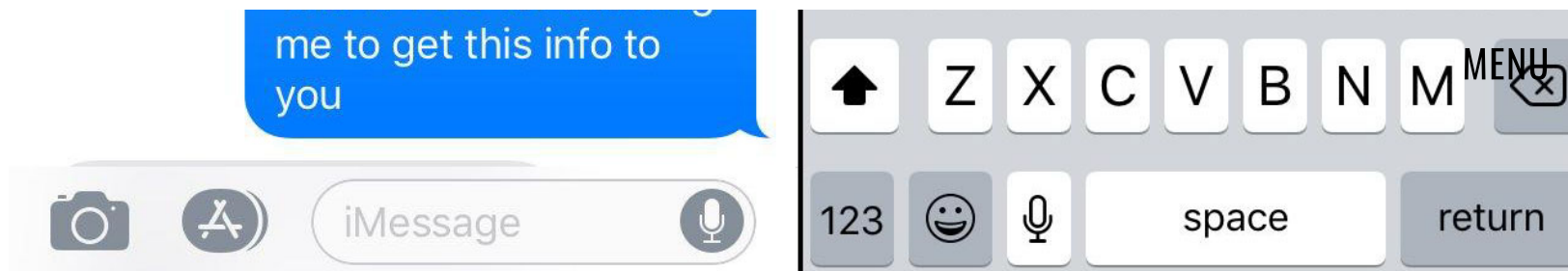
The council doesn't often step in to advocate against other [Twitter] users, says Executive Director Zahra Billoo, but did so in the case of Ms. Loomer based on her previous comments about Muslims. In 2017, Ms. Loomer tweeted after a terror attack in New York City, "Leave it to Muslims to ruin everything. People can't even enjoy #Halloween without those savages f**king everything up for everyone."

Other organizations, including the civil-rights organization Muslim Advocates, voiced similar complaints.

After the Wall Street Journal story ran, Loomer sent an article to the team of pranksters, thanking them for the “tip” about CAIR.

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<<https://www.rightwingwatch.org/post/did-the-wall-street-journal-fall-for-a-prank-directed-at-laura-loomer/>screenshot-2/>

Laura Loomer thanks prankster Chris Gillen for “the tip” that was reported in the Wall Street Journal and claims she “communicated with the journalist who broke the [Wall Street Journal] story.”

The Wall Street Journal reporters who authored the story declined to provide comment to Right Wing Watch. Loomer did not answer an email inquiry or a text message inquiry for this story.

“My first thought was why is the Wall Street Journal talking to Laura Loomer for anything? For this story or anything, why is she a source?” Bernard said. “Loomer told them something and they went out and ‘confirmed’ it. That’s what it looked like.”

Right-wing Media Start Churning Disinformation



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TRENDING: GILLETTE GETS WOKE RUSSIA HOAX REDUX SHUTDOWN WEEK 4 LA TEACHERS STRIKE TRUMP TROLLS DC SNOWSTORM RUSSIA PR

WSJ: CAIR LOBBIED TWITTER TO BLACKLIST LAURA LOOMER

f SHARE 173 EMAIL g+ SHARE TWEET



BREITBART CONNECT

f t YouTube Instagram iTunes

BREITBART POLL

Should Beto run for President in 2020?

YES NO

MOST POPULAR

<<https://www.rightwingwatch.org/post/did-the-wall-street-journal-fall-for-a-prank-directed-at-laura-loomer/breitbart-wsj-loomer/>>
A Breitbart News article aggregates The Wall Street Journal's reporting on Laura Loomer's Twitter suspension. (Screenshot / Breitbart.com)

Soon, stories portraying CAIR as the muscle behind Loomer's Twitter ban overtook the right-wing corners of the internet. The Wall Street Journal's reporting on Loomer's suspension was repackaged by conservative news websites, including Breitbart <<https://archive.is/zybyt/>>, Conservative Review

<https://archive.is/hnmpd>), **Twitchy** <https://archive.is/8q2bn>), **The Gateway Pundit** <https://archive.is/nk1pr>), and **Big League Politics** <https://archive.fo/qovj7>). Prominent right-wing publications and Twitter users, including **Jacob Wohl** <https://archive.is/efemr> and **Jack Posobiec** <https://archive.is/6k9ys>), cited the Wall Street Journal's reporting to further their ongoing claims that conservatives face disproportionate moderation, or even censorship, on major tech platforms, and that prominent pro-Muslim groups are pulling the strings.

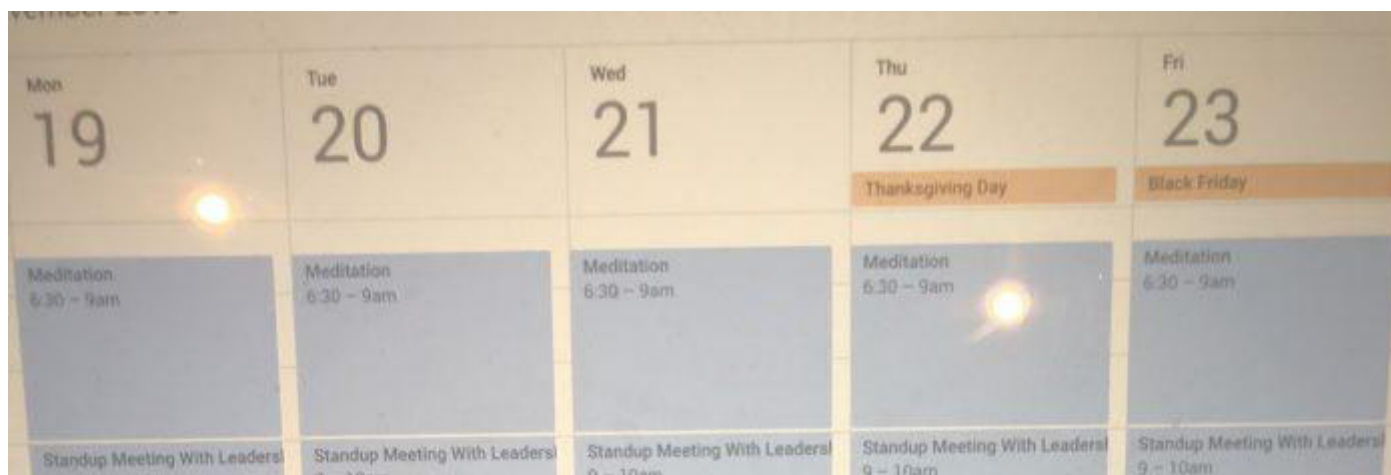
WorldNetDaily <https://www.wnd.com/2019/01/report-muslims-told-twitter-to-ban-jewish-reporter/> ran with the narrative, declaring that “Muslims told Twitter to ban Jewish reporter.” The Jewish Voice, a conservative Jewish publication, wrote on Twitter <https://archive.is/exxqn>), “the Wall Street Journal exposed the fact that Jewish journalist Laura Loomer was banned from Twitter because @CAIRNational, a designated Islamic terrorist org” complained about Loomer allegedly having had “exposed jihadis & Sharia.” Two days after the WSJ story published, a Twitter account used by officials of Gab, a social media site on which Loomer still enjoys free rein among its majority user base of conspiracy theorists and far-right adherents who have been banned from Twitter, tweeted <https://archive.is/ekbsx> that Loomer “was booted off Twitter after heavy lobbying from CAIR.” (Gab’s assertion was made in an attempt to bolster their claim that the Southern Poverty Law Center had <https://www.splcenter.org/hatewatch/2019/01/11/problem-epik-proportions> “smeared <https://www.splcenter.org/hatewatch/2019/01/11/problem-epik-proportions>” Gab’s business in a report about its domain host, Epik.)

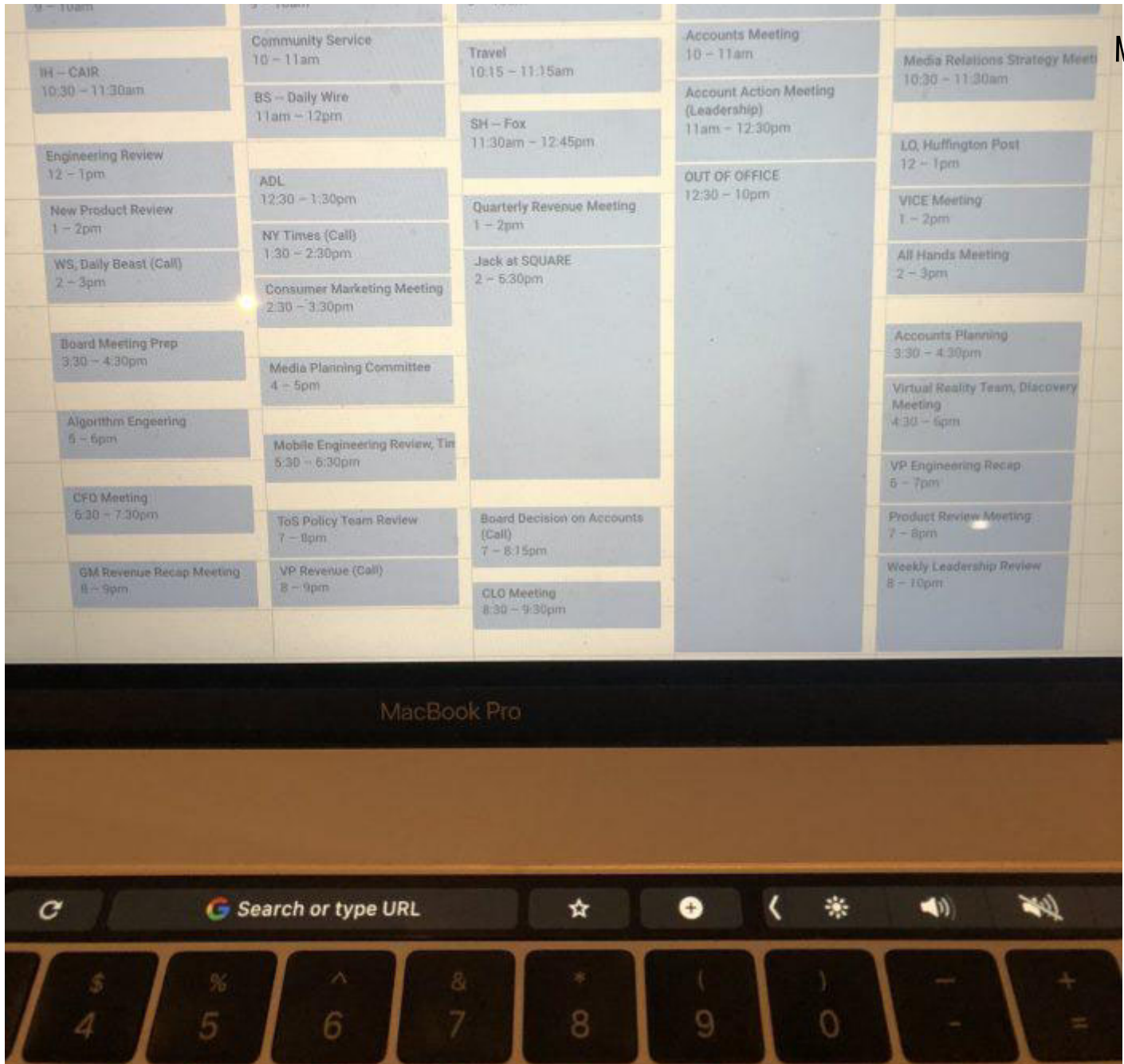
Right Wing Watch spoke with Billoo, the CAIR leader whom the Wall Street Journal reporters cite in their article. Billoo said that some CAIR staff and leaders, including her, had reported Loomer’s tweets using Twitter’s built-in reporting mechanisms on their personal accounts. She denied that CAIR had lobbied Twitter executives and added that CAIR had not orchestrated any national action campaigns regarding Loomer’s Twitter presence.

“In most cases online, there’s just too much hate to report all the content,” Billoo said. “However, in Laura Loomer’s case, because her hate is so astute, we stepped in and did, indeed, report her content.”

Billoo told us that she tried to clarify to the Wall Street Journal that CAIR’s role in Loomer’s suspension was limited to utilizing the platform’s built-in reporting features and that the publication’s reporters reassured her that she had been heard clearly. However, that information was not conveyed in their story.

One phase of Bernard’s prank involved sending Loomer a doctored Google Calendar screen that they claimed was the schedule of Twitter CEO Jack Dorsey, showing a meeting with CAIR two days before Loomer received her suspension from Twitter. The fake calendar sent to Loomer by the pranksters also displayed entries for meetings between Dorsey and The Daily Beast reporter Will Sommer, who confirmed to RWW he did not meet with Twitter officials, and conservative pundit Ben Shapiro, who did not respond to our email inquiry. The fake calendar Gillen sent to Loomer is pictured below:







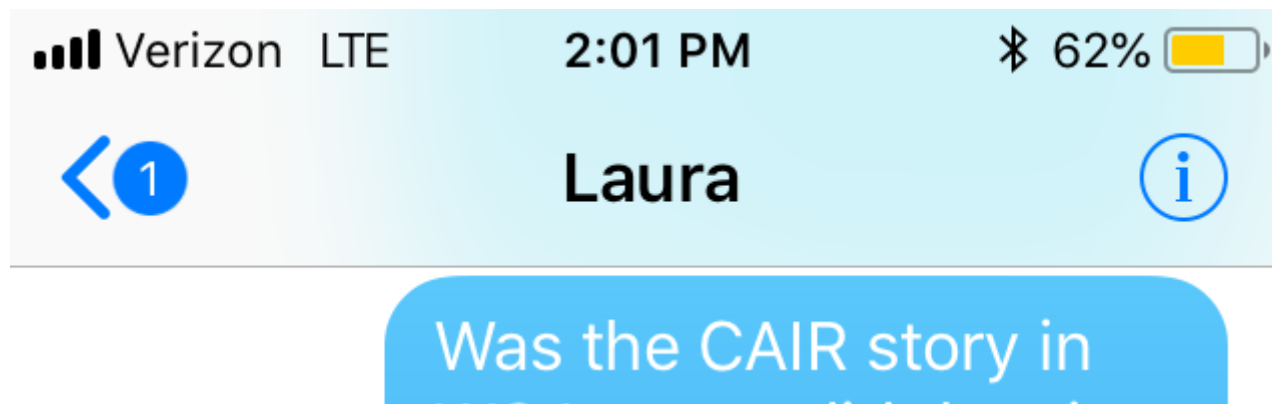
<<https://www.rightwingwatch.org/post/did-the-wall-street-journal-fall-for-a-prank-directed-at-laura-loomer/jackcalendar/>>

Nathan Bernard created and photographed this fake Google Calendar, which Chris Gillen sent to Laura Loomer and claimed displayed Twitter CEO Jack Dorsey's schedule.

A Twitter spokesperson told Right Wing Watch via phone that an internal investigation found that no senior executives at the company had records or recollections of meeting with CAIR representatives.

“None of our senior executives have met with CAIR. As we told the Journal, we do meet and work with many outside groups, but they do not dictate our policy enforcement decisions. We take action when our rules are violated,” the spokesperson said.

Bernard takes the fact that Twitter says it reviewed calendars looking for a meeting with CAIR in the wake of the Wall Street Journal's report as proof that the outlet attempted to fact-check information that only he and his pranksters provided to Loomer. In a text message sent to Gillen's "Brad" character after the WSJ article ran, Loomer told Gillen that she didn't think there was another leaker inside Twitter.



WSJ you or did they just get a comment from you? I hope it was you, I don't want someone else to beat us to this story

MENU

I mainly just want to be sure there's not another leaker inside twitter trying to go around me

I don't think there's another leak

CAIR admitted it too

You're right. Ok good.
Want to make sure it's
us in control of the story

MENU



iMessage



<<https://www.rightwingwatch.org/post/did-the-wall-street-journal-fall-for-a-prank-directed-at-laura-loomer/text32/>>

In a text message, Laura Loomer tells Chris Gillen that she didn't "think there's another leak" that could have prompted the Wall Street Journal's reporting.

Big tech companies often face criticism for the opaqueness of their enforcement protocols for their community guidelines, a critique that conservatives have used as the foundation for a host of conspiracy theories—particularly in pro-Trump circles—claiming that their worldview is being eradicated from the internet through the engineering of algorithms. Those claims have gained so much traction that they've prompted hearings <<https://www.rightwingwatch.org/post/at-house-hearing-google-ceo-wrestles-with-right-wing-conspiracy-theory-and-questions-about-why-my-phone-does-that-thing/>> with tech executives on Capitol Hill.

"The goal was that she was going to take this and then go on to Infowars or something and that we could make a bigger point about, 'Look, a troll literally created a fake story and it got on Infowars. What does that say about these far-right propagandists and how the information in these news stories

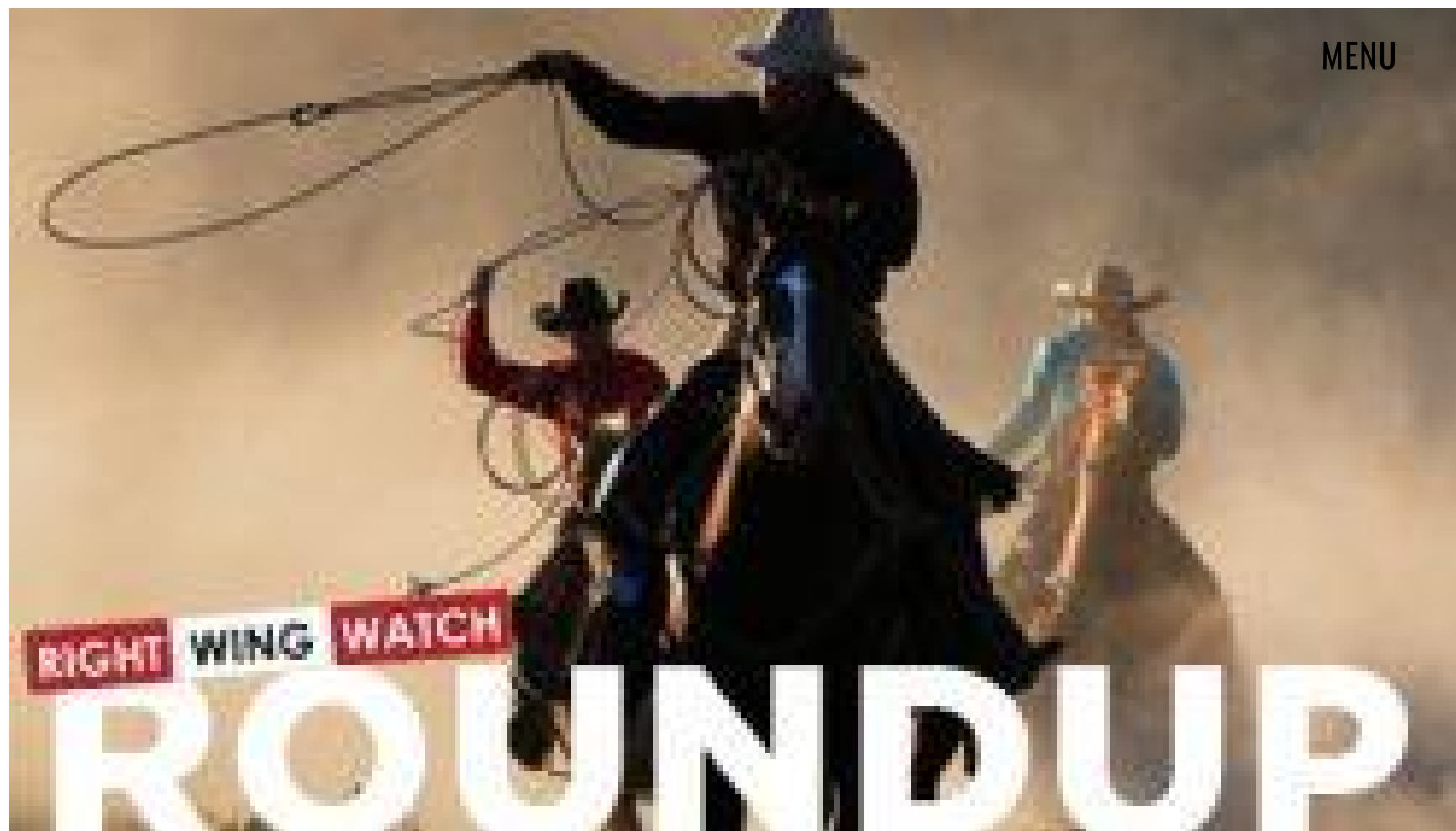
is created?” Bernard said.

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Gillen said, “We couldn’t have done it dumber. We couldn’t have been less careful. It’s so obviously bullshit.”

Tags: Jack Posobiec, Jacob Wohl, Jim Hoft, Laura Loomer, Anti-Muslim, Censorship, Islamaphobia, Media, tech companies, Big League Politics, Breitbart, Conservative Review, Gateway Pundit, InfoWars, Twitchy, Wall Street Journal

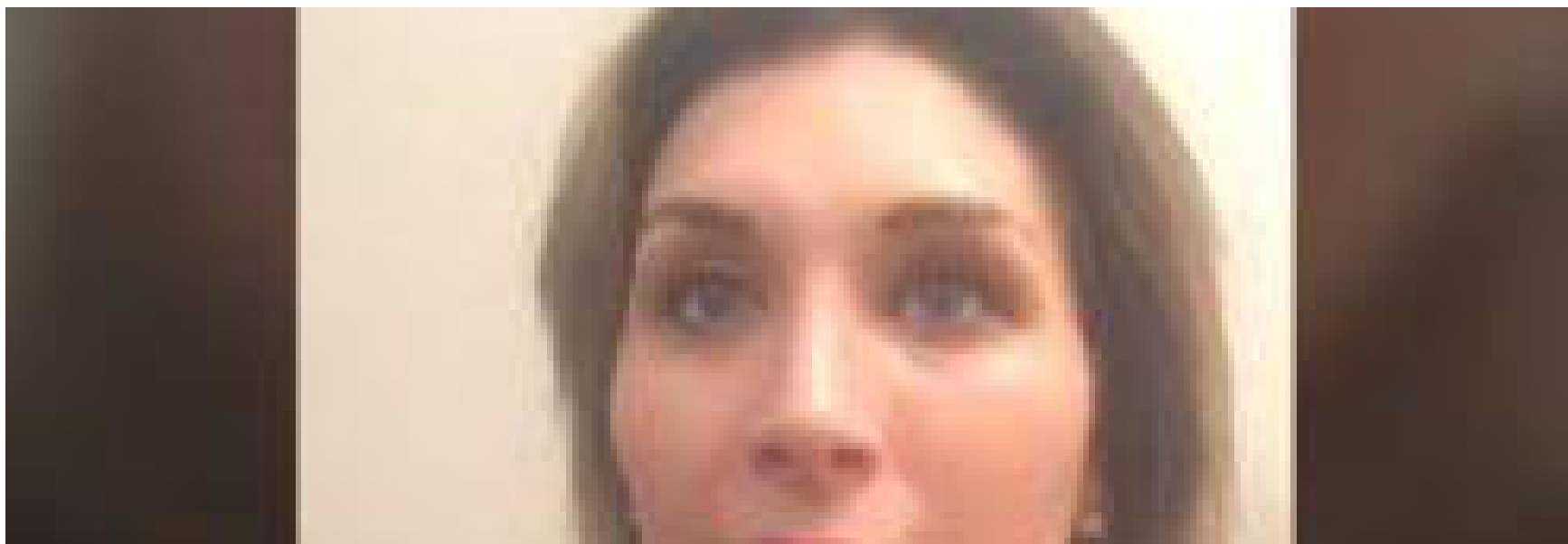
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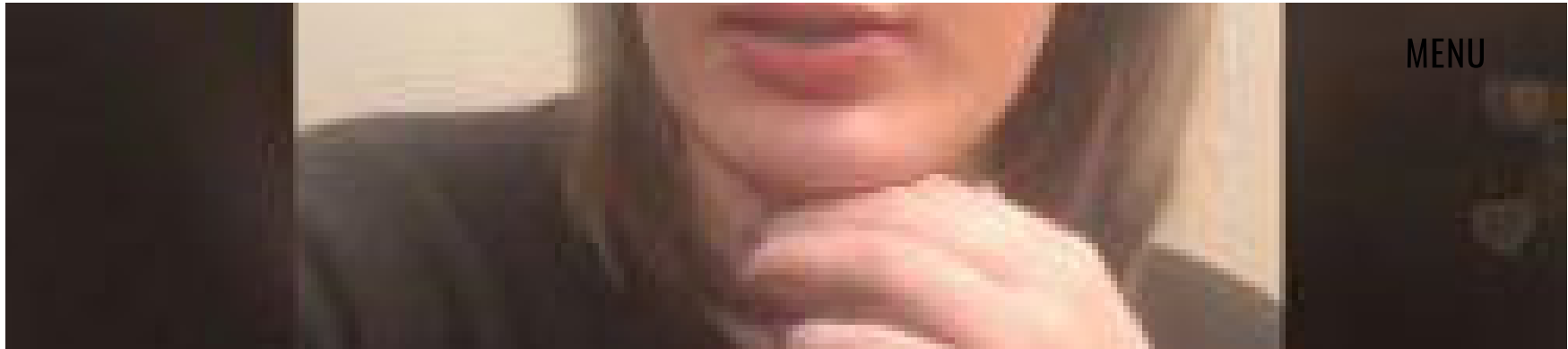


APRIL 25, 2018 5:34 PM

Right Wing Round-Up: Dragon Energy >

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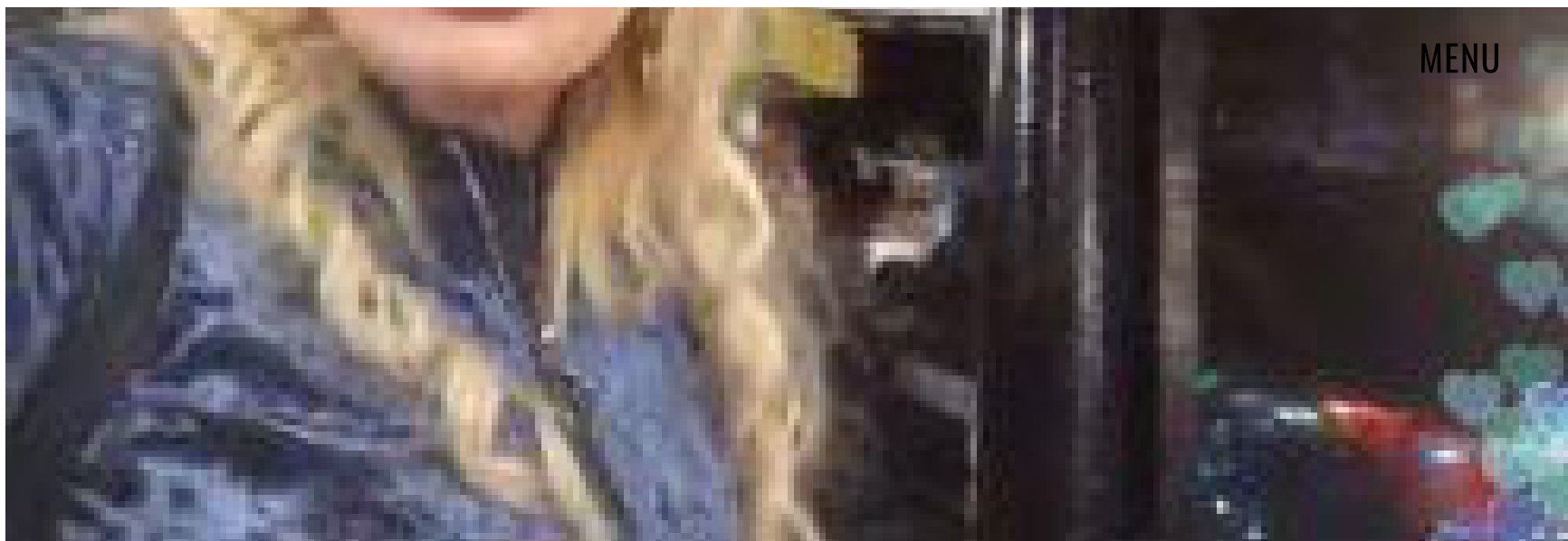




FEBRUARY 20, 2018 11:59 AM

Laura Loomer Is In Florida To Help Infowars Sow Disinformation About Another Mass Shooting >



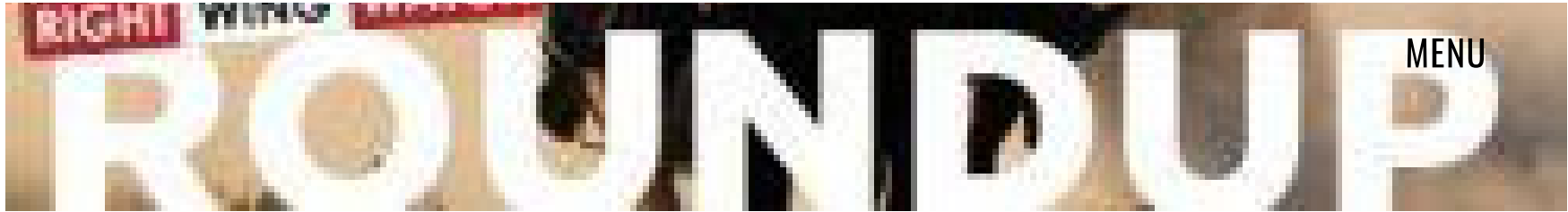


NOVEMBER 1, 2017 12:19 PM

Laura Loomer Goes Ballistic In Anti-Muslim Twitter Meltdown >

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JUNE 27, 2018 5:33 PM

Right Wing Round-Up: Anthony Kennedy Retires >



<<https://www.facebook.com/rightwingwatch/>>



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