## **DECLARATION OF BROOKE BINKOWSKI**

STATE OF CALIFORNIA \$

SAN DIEGO COUNTY \$

- I, Brooke Binkowski, declare under penalty of perjury the following is true and correct.
- 1. My name is Brooke Binkowski. I am over the age of 21 and competent to make this declaration. I reside in San Diego County, California. Given the nature of my work and the history of InfoWars publicizing personal information to its audience, I prefer not to provide my date of birth or address. I have been informed that substantial compliance with Texas law does not require me to provide this information, and I wish to exercise that right.
- 2. I have more than twenty years of experience as a multimedia journalist and professional researcher.
- 3. I possess a Bachelor of Arts from the University of California in International Studies Linguistics Anthropology, and I am currently completing my Master's thesis. I am also a Fellow in Global Journalism at the Munk School of Global Affairs.
- 4. Over my career, I have worked in reporting, editing, and producing roles for CNN, CBS Radio, National Public Radio, Southern California Public Radio, Foreign Policy, Latino USA, as well as others as a freelance reporter. I also served as the Managing Editor of Snopes.com from 2015 to 2018.
- 5. As part of my work, I have become very familiar with InfoWars.
- 6. InfoWars has produced a vast amount of content relating to Sandy Hook, and a vast amount of content in general. Mr. Jones frequently hosts as much as four hours of InfoWars programming in a day, and the network features other hosts as well. InfoWars has created an enormous volume of video recordings.
- 7. InfoWars also publishes daily news articles on their website. A Google search for [site:infowars.com "sandy hook"] returned 10,500 results. InfoWars also maintains an active social media presence. For example, InfoWars' account on Twitter has posted over 50,000 tweets. Mr. Jones has also posted nearly 50,000 tweets on his personal account, as well as frequent Facebook videos, Periscope recordings, and various miscellaneous media. InfoWars personalities also have active social media accounts.
- 8. I have reviewed the affidavit of Fred Zipp, who provided a broad outline of the history of InfoWars' most notable statements about Sandy Hook. I have attached to this declaration the full video of each InfoWars episode discussed by Mr. Zipp, downloaded from YouTube prior to the suspension of the InfoWars account.

- 9. From my personal knowledge in monitoring InfoWars, I know Mr. Zipp's discussion was merely a summary and far from exhaustive.
- 10. I am aware of multiple videos not specifically discussed in his affidavit, including videos featuring InfoWars reporters Rob Dew and David Knight promoting Sandy Hook falsehoods, InfoWars reporter Paul Watson's hour-long discussion with Sandy Hook denier James Tracy, and videos featuring InfoWars reporter Dan Bidondi, who travelled to Newtown with hoaxer Wolfgang Halbig in order to harass residents.
- 11. While in Newtown, it was reported that Mr. Halbig was "banned from St. Rose of Lima, a local church, after he was seen with other hoaxers who were allegedly videotaping kids walking in and out of the building." There are also disturbing videos available online of Mr. Bidondi and Mr. Halbig harassing local officials and municipal employees during their time in Newtown.<sup>2</sup>
- 12. In the summer of 2016, in the midst of the presidential campaign, Alex Jones drew criticism from Hillary Clinton over his Sandy Hook obsession. In response, he posted a video addressing the subject. Mr. Jones' response was discussed in a *Real Clear Politics* article at or near the time it was made, <sup>3</sup> but the video is no longer available. The article notes that Mr. Jones denied ever claiming Sandy Hook was fake, but the remaining content is unknown.
- 13. It is also nearly certain that there are numerous InfoWars videos on Sandy Hook which I am unaware, but that were nevertheless widely seen by the hoax community.
- 14. Moreover, while Mr. Zipp's affidavit focused on videos produced by InfoWars, he only briefly discussed InfoWars' publication of articles on its website. I am aware of numerous additional articles from the InfoWars website that relate to its Sandy Hook hoax narrative. These articles, which I've attached to my declaration, include:

<sup>&</sup>lt;sup>1</sup> http://nymag.com/daily/intelligencer/2016/09/the-sandy-hook-hoax.html

<sup>&</sup>lt;sup>2</sup> https://youtu.be/YDU624mi2FM?t=7m; https://www.youtube.com/watch?v=D-k0p8r122E

DATE	TITLE
Dec. 12, 2012	'Dark Knight Rises' Scene Eerily Shows "Sandy Hook" Written on Map
Dec. 19, 2012	How the Newtown Massacre Became a Mind-Control Television Event
Dec. 19, 2012	Father of Sandy Hook Victim Asks 'Read the Card?' Seconds Before Tear-Jerking Press Conference
Dec. 20, 2012	CONFIRMED: Section of Gotham Renamed "Sandy Hook" in Latest 'Dark Knight' Release
Dec. 30, 2012	Sandy Hook: How Television Takes Your Guns
Jan. 4, 2013	Photo of Obama Reacting to Sandy Hook News More State Propaganda
Jan. 8, 2013	College Professor Says 'Crisis Actors' May Have Played Part If Sandy Hook Was Indeed a Hoax
Jan. 13, 2013	Sandy Hook AR-15 Hoax? Still No School Surveillance Footage Released
Jan. 27, 2013	Special Report: Why People Think Sandy Hook is a Hoax
March 28, 2013	Cover-Up of Adam Lanza Link to Psychotropic Drugs
May 23, 2013	State of Connecticut Crafts "Special Act" to Hide Sandy Hook Evidence
Sept. 24, 2013	State of Connecticut Refuses to Release Adam Lanza's Medical Records
Jan. 27, 2014	Exposed: Sandy Hook Shooter's Biggest Threat Still Lives
Feb. 18, 2014	School Shooting Expert Threatened Over Sandy Hook Investigation
May 9, 2014	Revealed: Sandy Hook Truth Exposed

May 13, 2014	Connecticut Tries to Hide Sandy Hook Truth
Sept. 24, 2014	FBI Says No One Killed at Sandy Hook
Sept. 26, 2014	Sandy Hook Investigator: Connecticut PD Had FBI Falsify Crime Statistics
Dec. 2, 2014	Video: We Need to Talk About Sandy Hook
Dec. 9, 2014	Internet Censors Viral Sandy Hook Truth Documentary
Jan. 2, 2015	Mystery: Sandy Hook Victim Dies (Again) in Pakistan
June 5, 2015	Official Claims DHS Involved in Sandy Hook
July 7, 2015	MEGA MASSIVE COVER UP: Retired FBI Agent Investigates Sandy Hook
July 8, 2015	The Fight for Freedom of Information in Sandy Hook
July 10, 2015	Sandy Hook FOIA Killed By Commission
Jan. 5, 2016	Obama's Crying Fuels Speculation It Was Faked
June 14, 2016	It Will Be Impossible to Get Any Truth Out of the Orlando Shooting
Nov. 28, 2016	Infowars Being Attacked by Woman Who Lost Her Mother at Sandy Hook Shooting
June 13, 2017	What Alex Jones REALLY Believes About Sandy Hook

15. In recent months, a large volume of InfoWars content has been removed from the public domain, and the content which remains is often difficult to search. In short, fully documenting InfoWars' years of conduct regarding Sandy Hook poses enormous challenges which likely cannot be performed with any certainty without access to InfoWars' internal records and witnesses.

Brooke Binkowski

Executed by Brooke Binkowski in San Diego County, California on September 10, 2018.

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