

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

RILEY JUNE WILLIAMS

No. 1:21-cr-618-ABJ

PROFFER REGARDING AGENT TESTIMONY

Pursuant to the Court’s directive at the pretrial conference on November 3, 2022, and Minute Order of November 4, 2022, the United States of America submits the following proffer regarding the anticipated trial testimony of FBI agent(s) concerning Nick Fuentes, the “America First” podcast, and Groypers.¹ This anticipated testimony will be likely be paired with additional testimony from non-government individuals regarding these topics.

- a. During the course of their responsibilities and duties, including as part of this investigation, the testifying FBI agent became familiar with Nick Fuentes and the “America First” or “Groypers” movement. This included watching video footage of the podcasts and speeches made by Nick Fuentes in late 2020 and early 2021, including those saved on the defendant’s iCloud account;
- b. Nick Fuentes is a public speaker and provocateur who hosts online podcasts under the name “America First;”
- c. The followers of Nick Fuentes and his “America First” show are commonly referred to as “Groypers” or the “Groypers Army;”

¹ At present, the government does not intend to elicit testimony or offer other evidence at trial regarding the defendant’s following and adoption of Accelerationism.

- d. The commonly used symbol or avatar for “Groypers” and the “Groyper Army” is a green frog- or toad-like creature, which is associated with Pepe the Frog, a symbol commonly used by alt-right groups and individuals;
- e. The defendant used and adopted the “Groyper” symbol and avatar in her online conversations, took a photograph with Nick Fuentes on December 12, 2020, and wore an “I’m with Groyper” shirt to the U.S. Capitol on January 6, 2021. She also downloaded clips from numerous “America First” podcasts hosted by Nick Fuentes onto her iCloud account prior to January 6, 2021;
- f. Following the November 2020 presidential election, and leading up to January 6, 2021, one of the primary messages of Nick Fuentes and his “Groypers” was that the 2020 presidential election was stolen and illegitimate;
- g. Nick Fuentes attended and spoke at a “Stop the Steal” rally in Harrisburg, PA on December 5, 2020, and also the “Million MAGA” rally in Washington, D.C. on December 12, 2020, which was organized as a protest of the presidential election results;
- h. On January 6, 2021, Nick Fuentes encouraged his followers to continue occupying the U.S. Capitol until the election results were overturned.

As discussed at the November 3, 2022, final pre-trial conference and in the government's reply in support of the Rule 404(b) Notice, all of the above proffered points are facts learned by the FBI agent(s) in the course of their duties and investigation, and are derived from Nick Fuentes' publicly available statements and online spaces associated with him and the "Groypers." The FBI agent(s) did not need to apply specialized skills or knowledge to learn or understand these facts. They only needed time. None of the above statements are opinions.

Dated November 7, 2022.

Respectfully submitted,

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