

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF KENTUCKY
3 CENTRAL DIVISION AT FRANKFORT
4 CASE NO. 3:17-cv-00060

5 DREW MORGAN and MARY HARGIS PLAINTIFFS

6 v.

7 MATT G. BEVIN, in his official capacity as
Governor of Kentucky DEFENDANT

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13 DEPOSITION OF

14 WOODROW "WOODY" WILSON MAGLINGER, III

15
16
17
18 Frankfort, Kentucky
19 October 12, 2018

20
21
22 Lisa Colston, FCRR, RPR
23 Federal Certified Realtime Reporter
24
25

1 believe, 12 pages attached.

2 A Uh-huh.

3 Q It's a copy of the front page as of, I believe,
4 today or yesterday Governor Bevin's official home
5 page --

6 A Yes.

7 Q -- is that correct? And how do we know that it's
8 his official home page?

9 A It looks like his home page to me just because of
10 my recognition of seeing this. But then also the
11 blue verified checkmark is always something that I
12 know that denotes that. But I recognize the
13 header up here (indicating) as well as just the
14 general layout of it.

15 Q Okay. And so what does the blue checkmark mean?

16 A I believe it means that we are a verified account
17 as opposed to, I guess, the vast majority of
18 people that are just an ordinary or regular
19 account but someone that Twitter has verified as a
20 government official or an official account.

21 Q And there's a link on there that says
22 "governor.ky.gov" on the left-hand side;
23 do you see that?

24 A Yes, sir.

25 Q And where does that page link to?

1 A That link would take you to our official
2 Governor's web page, which is where our
3 information resides as far as the Governor's
4 office and also press releases and so forth.

5 Q And what does it say under his user name for his
6 bio? Do you see where his user name is?

7 A Okay. I'm sorry.

8 Q Well, let's just go through it.

9 A Okay.

10 Q So it says, "Governor Matt Bevin." That's his
11 name that he uses to identify himself, correct?

12 A Yes.

13 Q And then there's an @GovMattBevin. What is that
14 referred to as?

15 A That is his Twitter handle that is specific to our
16 account there that on Twitter it identifies him.

17 Q And then below that, it identifies him as what?

18 A The Governor of the Commonwealth of Kentucky.

19 Q Okay.

20 (Exhibit 3 marked)

21 Q I'm handing you what has been marked as Exhibit
22 No. 3.

23 A Thank you.

24 Q Okay. And I will represent that this is several
25 pages of screenshots of Governor Bevin's official

1 Facebook page; is that correct?

2 A Yes.

3 Q And there's also a blue check next to
4 Governor Matt Bevin's name at the top left-hand
5 corner; do you see that?

6 A Yes, sir.

7 Q And what does that checkmark mean?

8 A I believe that is very similar to the Twitter
9 verified, in that for higher profile users that
10 that is a verified account so that individuals
11 know that that person is -- is indeed who they
12 represent themselves as.

13 Q Okay. And what is listed under contact info?
14 I believe it is on the left-hand side --
15 right-hand side.

16 A Right-hand side. Contact info, would that be our
17 website again and linking to that Governor --

18 Q Hold on. Actually, it might not be on that page.
19 But let's talk about what is on there.

20 A Sure.

21 Q So on the community it suggests that there are
22 127,000 people, approximately, that have liked
23 this. What does that mean?

24 A My understanding is that would be anyone who is a
25 Facebook user them self who chose to click "like"

1 their point of view.

2 Q What do you mean by "advocacy groups"?

3 A Just for an example, I don't know -- recall if
4 this was a specific one recently we've had, but
5 there's a very active contingent of legalization
6 of marijuana, for example. And a lot of times,
7 you know, those posts will be multiple posts on
8 the same one. Again, if it is adoption and foster
9 care, within that discussion you will just see
10 from the same person, you know, three or four or
11 five posts in a row with the exact same text copy
12 and posted in there -- copy and pasted in there.

13 Q So if I were this new person, what I should be
14 looking for is something within the same post?

15 A Yes. And usually, my experience has been, they
16 will almost certainly be just copied and pasted.
17 There won't be individual nuance to them. It will
18 be the exact same post over and over again within
19 the same post or within the same day, just
20 multiple times. It kind of sticks out to you
21 because you can see that as you are scrolling
22 pretty easily.

23 Q Okay. I want to talk a little bit about your
24 understanding of the process for posting a tweet
25 by Governor Bevin.

1 Q (Moved head up and down).

2 A Gosh. I'm trying to think in my mind. I -- I
3 believe -- I know on Twitter there is a feed that
4 you can see. On Facebook we have notifications
5 that will come in, so you can see a portion of
6 them, not all at once but you do see a portion
7 when you get the notification up here that there
8 are new comments.

9 Q But with respect to the actual Twitter page, when
10 you first go to the Governor Matt --
11 @GovMattBevin's official Twitter page, those
12 possibly offending replies don't show up, correct?

13 A Correct. It would -- it would be a matter of
14 clicking here (indicating) to expand and see
15 what's below.

16 Q Okay. After you capture the screenshot, left
17 click and click block, are there any other steps
18 in the process of blocking somebody?

19 A No, no.

20 Q Do you tell anybody else that, "Hey, I blocked x
21 number of people today"?

22 A No. No. To be quite honest with you, it's not
23 one of my favorite things. It's -- that can be a
24 pretty dingy place sometimes. And it is not my
25 favorite thing. I kind of like to move on to the

1 A There is -- I am not as familiar on the Facebook
2 side as Twitter. But there is an actual block or
3 ban ability on that if a person is violating that,
4 similar to Twitter.

5 Q And are you aware there is also like a hide or
6 delete a comment?

7 A Yes. I have seen that on there as well before.

8 Q And so how do you distinguish between hide,
9 delete, block?

10 A As far as, I believe, that our filter will
11 automatically hide some comments that have that.
12 But as -- as any computer program, I don't believe
13 it does catch everything and so there are things
14 that slip through sometimes.

15 Q So there's an automatic filter, you are saying?

16 A Yes.

17 Q Okay. And did you set that automatic filter?

18 A No, I did not.

19 Q Did someone in your office set that?

20 A Yes. I believe that has been set up since before
21 I arrived.

22 Q Do you know who set that up?

23 A I do not know the answer to that.

24 Q And so if it is triggered by that automatic
25 filter, what happens to the comment?

1 A The comment will be grayed out. You can still see
2 it as you are scrolling through. But it is grayed
3 out, where I'm assuming it is not visible to the
4 public if it's been blocked.

5 Q So when you say you can see it, you mean you
6 the --

7 A As the administrator, yes, sir.

8 Q Okay. Thank you.

9 And then if there is one that's not grayed
10 out, a comment that is not grayed out but you
11 still think meets a criteria of either blocking,
12 hiding, or deleting, how do you distinguish
13 between whether you want to hide that comment,
14 delete that comment, or block the individual
15 permanently?

16 A On that? What I usually do, if it's -- I kind of
17 go by the same guidelines as Twitter. If it is
18 someone who is violating, I will go ahead and hide
19 the comment. But then I will also block the user,
20 similar to Facebook that way. Or ban I guess is
21 the terminology of Facebook.

22 Q And if you were to just hide the comment, would
23 that have any other effect on that user; do you
24 know?

25 A I don't think so. I don't know the answer. I'm,

1 Q When you are using the computer for Facebook or
2 Twitter, is that a State-issued computer?

3 A Yes, it is.

4 Q Okay. And when you said sometimes you do it over
5 the phone, is that a State-issued phone?

6 A Yes. I have a State-issued phone that is logged
7 into our Twitter account. And then also our
8 Facebook admin on that, too. So I can view those.

9 Q And the work that you have been describing with
10 respect to Facebook and Twitter, those are all
11 done during work hours?

12 A Yes. There are times, just because of the nature
13 of it, that, you know, we do them outside of work
14 hours. I try to keep track as best I can of the
15 hours. But in the evenings and a lot of times on
16 weekends we still do need to check.

17 Q And if you do check, you're considering that is
18 part of your work?

19 A Yes. Yep.

20 (Exhibits 5 and 6 marked)

21 Q Okay. I have handed you what has been marked as
22 Plaintiff's Deposition Exhibits 5 and 6.
23 Exhibit 5 is Defendant's Responses to Plaintiffs'
24 First Set of Discovery Requests. And Exhibit 6 is
25 Defendant's Supplemental Responses to Plaintiffs'

1 Q It then lists 18 individuals?

2 A Yes. That looks to be correct.

3 Q Okay.

4 A Just counting real quick.

5 Q Yes. Go ahead. I want you to make sure.

6 (Witness reviews document)

7 A Yes, sir, 18 individuals.

8 Q Okay. And it indicates -- the response indicates
9 that they were involved in three possible topics;
10 correct?

11 A Uh-huh. Yes. Posting, blocking or banning and
12 having deleted or hidden off-topic comments.

13 Q Okay. I want to just go through each of these 18
14 and give me your understanding of what they did of
15 those three and the nature of their involvement.

16 A Sure.

17 Q So let's talk about Blake Brickman. He is the
18 chief of staff?

19 A Chief of staff, yes, sir.

20 Q And he has been in that role for the entirety
21 of --

22 A Yes, sir.

23 Q -- the time frame at issue here?

24 A I believe so. I know that he was brought on early
25 on, my understanding. I did not join the

1 administration until April of '16. But I believe
2 Blake has been here since the inception.

3 Q Okay. And was he involved in posting content?

4 A Not to my knowledge, no.

5 Q And what about blocking or banning accounts?

6 A Again, not to my knowledge that he had involvement
7 in that.

8 Q And what about deleting or hid an off-topic?

9 A Not to my knowledge is that something that he has
10 been involved with.

11 Q So what is your understanding of his involvement
12 with the Governor's official Facebook or Twitter
13 page?

14 A I don't know that I would be able to answer a
15 direct involvement on what he would do, per se,
16 other than just as chief of staff obviously
17 having, you know, direct oversight of all our
18 departments.

19 But I am not familiar with his role in
20 actually posting, deleting, or hiding anything on
21 either of our accounts.

22 Q Okay. And if at any point for these you don't
23 know, that's okay.

24 A Okay.

25 Q I want to know what you know.

1 A Okay.

2 Q And if there is somebody who would know, let me
3 know --

4 A Okay.

5 Q -- okay?

6 A Okay.

7 Q So who would know what Blake's involvement with
8 maintaining the Governor's official Facebook or
9 Twitter accounts would be, other than Blake
10 himself?

11 A I was going to say Blake is the only one I would
12 know for sure.

13 Q Would the Governor know?

14 A There was about -- I guess there was almost a full
15 year between -- or there was a full year between
16 the administration beginning and when I came on
17 board up here, so I couldn't speak to that time
18 before. But I wouldn't know besides Blake himself
19 on that.

20 Q And would the Governor know?

21 A I don't know the answer to that, either.

22 Q Okay. Would Amanda know?

23 A I -- I don't know. I -- I apologize. I don't
24 know the answer to that, either.

25 Q Okay. We'll move on.

1 Nicole Burton, what is your understanding of
2 her involvement?

3 A Nicole would be involved in all three aspects of
4 that, the posting, blocking, and -- or is it --
5 is there a third one? I'm sorry.

6 Q So let's --

7 A Deleting, hiding. Sorry.

8 Q Just to make it clear what we're looking at, for
9 purposes of this one let's just look at Exhibit 6.

10 A Okay. Posting, blocking, and deleting, yes, that
11 would -- Nicole would be involved in all three
12 aspects.

13 Q Okay. And Jessica Ditto?

14 A I would not be able to speak to her, either.
15 She had departed by the time I was hired here.

16 Q And what was her role before you departed?

17 A She was the communications director prior to
18 Amanda Stamper.

19 Q Okay. Is it your understanding that she would
20 have been involved in developing some of the
21 criteria that we had discussed before about what
22 led to people being blocked?

23 A I don't know the answer to that, either. She had
24 departed probably three months at least before I
25 arrived, so I do not know the answer to that.

1 Q Catherine Easley?

2 A She also preceded my time. She was, I believe, a
3 deputy chief of staff for external communications,
4 if I'm remembering her title correctly. But,
5 again, had departed before I arrived.

6 Q So you don't know what her involvement was with
7 maintaining the Governor's official Facebook or
8 Twitter accounts?

9 A No, sir. I am not familiar with that.

10 Q And can you just repeat her --

11 A Sure.

12 Q -- title again?

13 A I hope I'm telling you all right. But I do
14 believe she was the deputy chief of staff for
15 external communications. External affairs,
16 perhaps.

17 Q That's okay.

18 A Let me add a few more words to that.

19 MR. MEREDITH: I think it was
20 external affairs.

21 MR. SHAPIRO: That's fine.

22 THE WITNESS: I think that's right.

23 MR. SHAPIRO: This isn't a test. I
24 didn't realize there would be so many words
25 in one person's title.

1 Q And who would know?

2 A I would not know, honestly, other than just
3 Catherine herself --

4 Q Okay.

5 A -- or Jessica, who -- who would know the answers
6 to that.

7 Q And when did she depart, approximately?

8 A I don't know the answer to that, either.

9 Q If you don't know, that's fine.

10 A I arrived in Decem -- mid-December of '16. And I
11 know she had departed before then. But how much
12 before, I am not sure.

13 Q That's fine. John Hodgson?

14 A He is our operations manager. I would have the
15 same answer for him as Blake. I don't know him to
16 have involvement in those three areas. But that
17 would be something I would have to defer to him.
18 I don't know -- know his responsibilities.

19 Q And he has been operations manager the entire time
20 you have been here?

21 A Yes, sir.

22 Q Who does he report to; do you know?

23 A I would assume -- I'm a little rusty on our org
24 chart. But I guess Blake Brickman as chief of
25 staff would be at the top of our org chart. But

1 John is operations manager that works with human
2 relations and hiring on boards and commissions and
3 those things.

4 Q Okay. Andrew King?

5 A Andrew is no longer with us. He was that deputy
6 digital director I referenced earlier under Chase.
7 Again, I apologize for the time frame. But I'm
8 thinking it was definitely -- well, I thought I
9 was going to be able to say early '18. I was
10 thinking late '17 into early 2018 that he was with
11 us. But my understanding was from working
12 concurrently, the same time as him, that he would
13 not have been involved in the posting but would
14 have helped us with blocking, perhaps, from time
15 to time.

16 Q And he left approximately when? If you don't
17 know, just...

18 A I do not know. I'm sorry.

19 Q That's fine.

20 A I'm sorry.

21 Q That's fine.

22 A I don't.

23 Q I don't want to make this a struggle.

24 A It was 2018. But I --

25 Q Sometimes you know when people leave; sometimes

1 you don't. I don't want to make this a struggle.

2 A Yeah. I don't know his term. I'm sorry.

3 Q That's fine. Elizabeth Kuhn?

4 A Elizabeth's our current director, joined us in
5 mid-January of this year, in 2018. She would be
6 similar to myself and Nicole with posting,
7 blocking, and deleting.

8 Q Okay. And you are listed?

9 A Yes, sir.

10 Q Chris Skates?

11 A Chris is our communications adviser. He serves as
12 far as helping with a lot of correspondence that
13 goes out as well as helping us just on different
14 projects, grants, and things like that. I believe
15 he would be just in -- in the same category there
16 as Andrew I mentioned, that he would just help
17 with blocking occasionally from time to time.

18 Q So did you mention Chris Skates as a member of the
19 communications department earlier?

20 A I didn't. And he would be so sad. I'm sorry I
21 left him out. He is actually across the hall. He
22 would take great offense to that. But he is
23 definitely a member of our team. But he moved to
24 an office across the hall. He's our long form
25 writer, and so he likes to have, I think, less

1 noise. And so the first opportunity he had to
2 move across the hall, he took it.

3 MS. GATNAREK: Our lips are sealed.

4 THE WITNESS: Thank you.

5 A But he is very much a part of our team, yes.

6 Q And he has been with the team the whole time?

7 A He precedes me. I don't believe he has been here
8 since the advent of the administration. But he
9 definitely precedes me, when I came on board in
10 December of '16.

11 Q And he was blocking when you arrived? He had
12 already been doing some of that?

13 A Yes. Yes. I believe he was helping in that area,
14 in that role.

15 Q You may have already told me this, and we may be
16 getting to that person on this list. But who was
17 the press secretary before you?

18 A Amanda was. I'm sorry. Amanda Stamper, who
19 became communications director, she was the press
20 secretary under Jessica Ditto.

21 Q And then when Jessica left, she moved up and you
22 became the press secretary?

23 A The press secretary, exactly.

24 Q I got it. Thank you. Chris Skates.

25 Ben Goldey?

1 A I have met Ben before, but do not know him well.
2 He actually departed, I think literally, just a
3 week or so before I arrived, if I remember
4 correctly. I believe he was in an intern capacity
5 or a part-time capacity. So I couldn't really
6 speak to what his role was, either. I met him
7 briefly, but that is the extent of my inaction
8 with him.

9 Q Do you know, if you know, was he involved with
10 helping with the blocking?

11 A I don't know the answer to that.

12 Q And Jordan Morgan?

13 A Jordan served as deputy press secretary when I
14 arrived. She helped us a lot with proclamation
15 requests and having those executed. Also kept up
16 with a lot of our news clippings that we'll try to
17 send around to administration folks so we can keep
18 up with what is happening in the news. And also
19 had a role in helping us as well when she was
20 here with -- I would say her role would be more
21 along the blocking lines as well, my knowledge. I
22 don't remember her posting. But helping on
23 blocking would have been her role.

24 Q Okay. Taylor Sears?

25 A Taylor was the Governor's personal assistant

1 and/or body man, we called him, when I arrived
2 here. He, I believe, was just one who would help
3 block from time to time. If there were extremely
4 high traffic and we were needing some extra help
5 on that, Taylor may have helped us. But he
6 departed for a different position not long after I
7 began.

8 Q So who did he report to?

9 A His office was actually there in the
10 communications office with us. His role is
11 primarily to accompany the Governor to events and
12 make sure to make connections with folks who are
13 needing to get business cards to the Governor,
14 contacts, follow-ups, that sort of thing. But he
15 did actually have an office there in our
16 communications suite.

17 Q But he wasn't sort of a part of, in terms of the
18 organizational chart, reporting to anybody in the
19 communications department?

20 A I would say maybe informally. I don't know that I
21 know exactly what the structure would look like on
22 a piece of paper. But we definitely -- he -- we
23 had regular communications with him since he
24 traveled with the Governor and would help him get
25 information he needed and talking points and

1 things like that. We interacted a lot with
2 Taylor.

3 Q Did you ever talk to him about who should be
4 blocked or the criteria for blocking people or
5 deleting comments?

6 A No. I never remember having a conversation with
7 Taylor about that.

8 Q Who did he get this sort of direction from as to
9 what the criteria were for blocking or deleting
10 comments?

11 A I would have to say I don't know on that one
12 because he was here before I was, so that was not
13 a conversation I either witnessed or took part in,
14 so I don't know the answer to that.

15 Q Did you ever see him sort of talk to Amanda about
16 a question she might have had, the way you
17 described earlier about people shooting some ideas
18 or questions about whether somebody should be
19 blocked?

20 A I do not recall that, no. He -- most of his time
21 was spent actually on the road with the Governor
22 at events. But in the times when he was in the
23 office, I never recall any conversations.

24 Q So would he have been blocking while he was with
25 the Governor?

1 A Again, that's something I would have no knowledge
2 of. When he would actually do that, I wouldn't
3 know.

4 Q Kathryn Snaveley?

5 A Yes. Kathryn is currently with us. And, I
6 apologize, I don't know her exact title. But she
7 is very active in helping us prepare the executive
8 summaries for different events that we participate
9 in and ceremonies and things like that, gathering
10 information from the contacts there in the
11 community and with the Cabinets. And she would
12 have a role in the blocking as well. Not on the
13 posting side, but on blocking.

14 Q And so you don't know her exact title. Where does
15 she fit in the sort of organizational hierarchy?

16 A She would be alongside, I would say, with --
17 with -- currently we have Elizabeth as the
18 director and then myself as deputy and Nicole as
19 our press secretary. And she would be in a
20 straight line with us.

21 Q Okay.

22 A External events. I am not sure. I would be
23 speculating her title. I need to know them a
24 little better, don't I?

25 Q No. It's fine. You're good.

1 A I may not know, but I can learn.

2 MR. MEREDITH: I will give you a
3 quiz next week.

4 THE WITNESS: And I will fail it.
5 I will fail it.

6 MR. SHAPIRO: All of those charts
7 and everything.

8 Q Amanda Stamper?

9 A My former boss, communications director during my
10 -- I intersected with her from December of 2016
11 until January of this year, 2018.

12 Q And --

13 A And she would have all three of those, posting,
14 blocking, and deleting or hiding.

15 Q Okay. And do you recall having a conversation
16 with her about questionable comments, whether to
17 block either on Twitter or Facebook?

18 A Not a lot. As -- as we discussed earlier, I'm
19 sure that early on in late 2016, early 2017, as I
20 was starting to do that, I probably on a couple of
21 them showed her, just said, "Hey, I'm going to
22 block this. Is this okay?" And, you know, she
23 would say yes and I would go ahead and do that.

24 Q Are there any specific examples you can recall?

25 A Oh goodness. Honestly, I do not recall. They all

1 kind of run together to me, to be honest with you.
2 I don't recall ever even -- I'm just thinking we
3 probably did have discussions in the fact that I
4 was learning how to do that. But I don't recall a
5 particular account or individual or even what the
6 topic would have been.

7 Q What about with anyone else? Do you recall
8 anything, like just hit you, yeah, I remember a
9 couple of months ago we had this one where I
10 couldn't decide whether to block him or not or
11 her?

12 A Honestly, it's been quite a while for me that I
13 really had a discussion about what was -- these
14 would have -- these conversations probably would
15 have come very early on in my tenure.

16 I honestly don't remember a specific
17 instance. I would -- I would -- I would have to
18 say I don't know specifically a good example of
19 one while I'm sitting here.

20 Q What about an example of when someone came to you
21 with a question?

22 A With a question? I am not recalling anything off
23 the top of my head. I'm very sorry. I don't
24 recall a specific instance of that, either, of
25 what I could give you an example of on that.

1 Yeah, I -- I'm sure when I began with Amanda,
2 you know, as I was blocking them I felt a little
3 nervous having the keys to the controls of
4 blocking and I wanted to make absolutely sure. So
5 my recollection is, I would have probably in an
6 abundance of caution just said, "I'm going to
7 block this account here because of this. I just
8 want to make sure it is okay." And of course,
9 you know, if I remember correctly, the answer
10 would have been, yeah, that's what we were talking
11 about, and it would have proceeded there. But
12 since then it more has just been something that
13 has been internalized.

14 Q And you don't have sort of -- I know when I'm
15 training somebody, I will sort of use a specific
16 sort of hypothetical or a real case example as a
17 way of teaching somebody.

18 Do you have one that is sort of a routine
19 example that you say, "Here is a tricky one and
20 here is a way to sort of think about it"?

21 A Not to my knowledge. I don't recall really having
22 a lot of, like I say, official training type
23 things. I would assume the conversations I would
24 have had with a new person would have been similar
25 to what I did with Amanda, just, you know, someone

1 wanting to be absolutely sure as they are starting
2 out, "Hey, am I doing the right thing?" And we
3 would look and say, "Yes, that is spam. That is
4 abusive. That is something that is objectionable,
5 like vulgarity." But, no, I don't have a good
6 like gory details or something that I can give a
7 story and say, "This is an example of one like
8 that." Sorry.

9 Q Okay. Leeann Veatch?

10 A Veatch (pronouncing).

11 Q Veatch.

12 A Uh-huh. She is -- apologies on, again, not
13 knowing her exact title. But she is our liaison
14 in Washington, D.C. that assists with
15 communications with Congressional offices up
16 there, with the different federal bureaucracy, for
17 when the Governor's had meetings up there, she
18 will help with arrangements there.

19 She precedes me, too. And I am not aware of
20 what her role would be in this, either. I am not
21 sure what her role would be. She's not someone we
22 consult to post, so I am not sure what her role
23 would be.

24 Q Okay. Jenna Williams?

25 A Jenna was our former receptionist that was down

1 the hall here in Room 100, the main office for the
2 Governor's suite, who was the receptionist to
3 greet guests as they arrived. And my time
4 intersecting with Jenna, she was not helping on
5 the posting side but would just help us with some
6 blocking, because she had some time when she was
7 up there that she would be able to help scroll
8 through and be of assistance to us. So that was
9 Jenna's role.

10 Q And who provided the guidance to Jenna about the
11 criteria for blocking?

12 A I did not do that, so I am not sure. I'm assuming
13 Amanda Stamper, but I would not -- that was not me
14 personally.

15 Q John Zurowski?

16 A John is our graphics director that I referenced
17 earlier. He primarily does our graphic design and
18 layout and helps a lot with the video team as
19 well, putting those together. And John does not
20 post. He does create items we put in the posts,
21 as far as when you see the graphics information or
22 things like that, photos sometimes. He helps us
23 with those. But his role would be more on the
24 blocking side.

25 Q And do you know who provided John with an

1 explanation of the criteria for blocking?

2 A I do not know the answer to that, either.

3 Q And John has been here for how long?

4 A We began almost simultaneously. I believe I was
5 December 16th, and I think he came in maybe the
6 2nd or 3rd day of January following.

7 Q And Matthew G. Bevin?

8 A Obviously the Governor and the accounts that bear
9 his name. As I mentioned before, there are times
10 that he will post content, with those being his
11 account. And particularly on the Twitter side.
12 I am not as familiar on Facebook, but I do know he
13 will post from time to time on -- on the Twitter
14 account.

15 I do not know the nature or extent of either
16 blocking or deleting, anything like that. I just
17 know that he will post from time to time. And he
18 will sometimes directly do that and other times if
19 he has an idea, like for his shave or grow
20 fundraiser we were putting on, he would direct us
21 in what direction to go with that and we would
22 work on that. But then other times, like Saturday
23 night, more of just a post on his own he
24 initiated.

25 Q And what about the second and third areas?

1 A I am not aware of the nature or if -- if he does
2 that or how he does that. I've not had
3 discussions with him about how he does that.

4 Q And who would know?

5 A I would assume he would himself. But I don't know
6 anyone else that does.

7 Q Have you ever had any conversations with the
8 Governor about blocking or banning people?

9 A The only conversations I've ever had with him
10 would have been if he noticed someone on there
11 that we had missed that he may, you know, say,
12 "Hey, you need to check out, you know, this person
13 is being vulgar on there and that sort of thing."
14 That has been a very limited number of times. But
15 I can recall just a very few handful of times
16 where he's mentioned seeing an account on there
17 and wanting us to go and make sure, if they were
18 behaving inappropriately to take care of that.

19 Q Are there any in particular that you remember?

20 A The one that pops out to me from -- from my
21 discussions with him was in regards to we had done
22 a video feature on a lady in the Fort Knox area,
23 I believe, who had -- I think she made pies for
24 the outgoing and incoming, maybe, officers there
25 at Fort Knox. And we had posted a video and he

1 had happened to notice, I think over the weekend
2 or something, that someone was using vulgarity on
3 that. And I think I remember that just because
4 with her being a pie lady. But I do remember her
5 mentioning -- him mentioning that someone was on
6 there being really vulgar on that particular post.

7 But that's honestly the only one that sticks
8 out to me. It's not a common occurrence. But
9 there has been a couple of times where he has seen
10 something and been concerned that it was on there.

11 Q Any other ones you recall?

12 A No. I don't remember any other specifics. That,
13 the pie lady one, just sticks out in my mind. But
14 other than that, I just -- you know, it would have
15 been along the same lines of just someone being
16 vulgar on there and we had not done our good job
17 of sweeping it early enough and seeing that.

18 Q Any times when he made a suggestion and you went
19 back and you weren't sure whether it really met
20 the criteria?

21 A No. The -- especially on that example, he was --
22 there was no doubt when I saw that one. If I
23 remember, the F word was used maybe a handful of
24 times, two or three times on that post. And so it
25 was obviously one that had stood out and we had

1 just missed when we were going through it
2 manually.

3 Q So that one sort of fits the vulgarity bucket?

4 A Uh-huh.

5 Q Has he ever asked you to look at one or
6 specifically to block somebody who fit the abusive
7 bucket?

8 A I don't remember an abusive one that he brought to
9 our attention. I remember the vulgarity one.
10 And I believe there was one time when someone was
11 spamming and he had noticed over the weekend that
12 they were posting it time after time after time.
13 And, again, it is just something that we had
14 missed. And I remember him directing us to that.
15 But I don't remember specifically an abusive one
16 that I had had a conversation with him about.

17 Q So you remember one about in the -- I think you
18 jumped ahead to my next question, which was --

19 A The next category?

20 Q The next category.

21 A Yeah. I do, I do. I don't recall what the
22 specific spam was. I just know that he had been
23 reviewing over the weekend and had noticed there
24 were a particular account that continued to post
25 time after time and we had missed it. I don't

1 remember if it was Facebook or Twitter. But he
2 just was helping to direct us to that.

3 Q And when you say "spam," you had sort of put a
4 couple of different items under the spam bucket --

5 A Sure.

6 Q -- was this a solicitation for some sort of a
7 commercial venture?

8 A I don't remember. I'm sorry. That has been quite
9 a while ago. I don't remember if it was a
10 commercial venture or if it was someone just
11 copying and pasting over and over. I don't
12 remember which one of those it was.

13 Q Okay. Any other instances that you can recall
14 where the Governor came to you with somebody that
15 should possibly be blocked?

16 A No. It is a -- it is a -- it is a very infrequent
17 thing. So those two stand out to me. But, no, I
18 don't -- I don't recall other specifics of -- of
19 ones that he would have asked about.

20 Q And do you recall overhearing or seeing the
21 Governor have similar interactions with others in
22 the communications department?

23 A Because of the positioning in my office, one or
24 both of those, I am not sure which, but he likely
25 would have walked through and mentioned that to

1 myself and to Amanda or maybe even Nicole there in
2 our little Bermuda Triangle there. And so in the
3 context of that, probably yes, where there might
4 have been more than one of us that heard it. But
5 I don't know that I just overheard -- I've ever
6 overheard him talking to someone else about that.
7 It was just letting us know that, hey, you all
8 need to check this out, this is a problem.

9 Q Okay. Let's go back to our discovery responses,
10 which is Exhibit 5.

11 A Okay.

12 Q So if you turn to page five.

13 A (Witness so complies).

14 Q We asked you to identify all employees, interns,
15 or other personnel involved in blocking.

16 That list of 18, there is no one else that
17 you are aware of that was involved in blocking
18 individuals from the Governor's official Facebook
19 page?

20 A No. That would cover everyone that I would
21 possibly think would be on that list, yes.

22 Q Okay. There is one person that you have mentioned
23 that I don't think is on that list. Chase.

24 A Chase Scott, our digital director?

25 Q Yeah. Would he have been involved in blocking?

1 block somebody?

2 A No. I don't recall him coming to chat with us
3 about that. Usually he will come down and bring
4 either, you know, letters or we will send those
5 his way. Primarily we correspond that way and he
6 will -- basically, is the front-facing office of
7 handling constituent inquiries.

8 Q Okay. So in number -- let's see. Let's talk
9 about the Facebook page.

10 What is your understanding of who is
11 expected -- who you all expect are going to read
12 the Facebook posts on the Governor's official
13 Facebook page?

14 A I would say the, what was it,
15 eighty-some-odd-thousand that are subscribed, or
16 that's the wrong word, I guess like the page or
17 follow the page. It would be people just
18 interested, I assume, in having the communications
19 of the Governor, being able to view those.

20 Q Okay. So does that include the news media?

21 A Yes. I believe we have -- I know on Twitter we do
22 and I believe on Facebook we do have some media.
23 Twitter might be a little higher presence of
24 media members that follow that. But I believe
25 there are media also on Facebook.

1 Q And Kentucky citizens?

2 A Yes, Kentucky citizens. And -- and I know just
3 from my experience on there we also have people
4 outside of the state of Kentucky as well that
5 follow.

6 Q Voters?

7 A Voters?

8 Q (Moved head up and down).

9 A I would assume. I don't know the answer to that
10 specifically. But I do know a lot.

11 Q But you expect voters are going to read the
12 Facebook posts?

13 A I hope so.

14 Q Okay.

15 A I hope so.

16 Q Conservatives?

17 A I would love -- well, I would love for all
18 Kentuckians. Just as the deputy communications
19 director, I would love for all four million folks
20 to keep up with civics and what is going on up
21 here in Frankfort. I would love that.

22 Q Conservatives?

23 A We definitely have conservatives, liberals.
24 I would say we have a pretty good mix on there,
25 from my -- my viewing.

1 Q Independents?

2 A Definitely independents, yes.

3 Q Republicans?

4 A Republicans.

5 Q Democrats?

6 A Libertarians.

7 Q Socialists?

8 A I'd say we probably have a little bit of everybody
9 on there.

10 Q And where does that, your understanding of that,
11 sort of this broad view of who is expected -- who
12 you expect to read the Facebook posts, where does
13 that understanding come from?

14 MR. MEREDITH: Object to the form.

15 But go ahead, if you understand the question.

16 A No, no. And I would ask if you could just -- I
17 would be glad to try to answer your question if --

18 Q Sure.

19 A -- you clarify it.

20 Q You know, we just talked about various different
21 types of people who you expect are going to be
22 reading these posts. So my question is: How did
23 you come up with that understanding?

24 MR. MEREDITH: When you say that he
25 expects, are you talking about his own

1 I know last week one of the ones I posted was
2 for the Find Help Now for the opioid crisis.
3 We're trying to let people know that if they're
4 needing immediate assistance, they don't have to,
5 you know, wait on-line, on a hotline, something
6 like that, we can try and connect them with a
7 facility. Different public services, things like
8 that, put that information out there so people can
9 see it.

10 Q Is it fair to say that another purpose is also to
11 encourage dialogue among constituents over these
12 issues?

13 A What I would say about that, that's a good
14 question, I would say that's not our primary
15 purpose. That is, obviously, a byproduct of that.
16 And a certain amount of that definitely can be
17 useful to us. We can scan through and, you know,
18 see, maybe, ideas, trends, things like that.
19 But that's not our primary aim in having it.
20 It is more to just let people know, hear his
21 voice, if they want to, and to hear what his
22 policy ideas are and kind of what his vision for
23 Kentucky is, is our main idea.

24 Q And so another -- as part of that, another
25 byproduct of using Twitter, you also are able to

1 obtain feedback from constituents on certain
2 topics --

3 A To a limited -- I'm sorry to interrupt.

4 Q That's okay.

5 A To a limited amount. I will say, just because of
6 the rapid-fire nature of our jobs and just as
7 we've been discussing here, just the innovation of
8 proliferation of posts, it's not something where
9 we're able to just go through and, you know, just
10 line by line see everyone's concern. But, sure,
11 definitely scrolling through I can get a flavor
12 for what is a hot topic, what is something people
13 like, don't like, that sort of thing in a general
14 sense.

15 Q And we talked about your understanding of who is
16 expected to read tweets.

17 I think it is the same broad group that we
18 talked about with Facebook, news media, citizens.

19 A Uh-huh. Yeah. We --

20 Q Yeah.

21 A -- we absolutely invite anyone that wants to
22 subscribe. My understanding is, you know, there
23 is a broad range, just from reviewing those.
24 There are definitely folks that are supportive of
25 what we're doing, there are folks on the other

1 side and everywhere in-between, honestly, quite
2 frankly.

3 Q And similarly to with Facebook, where does your
4 understanding of who that intended audience is,
5 where does that come from?

6 A My only, I guess, specific thoughts on that would
7 just be from hearing the Governor himself on
8 different occasions on videos he made encouraging
9 people to go on and follow those so they can see
10 what's happening. You know, for instance, for
11 this shave or grow fundraiser he was doing for the
12 foster kids, he would invite people to go to that
13 page and vote and that sort of thing. And it was
14 a platform for him to be able to share that
15 widely, rather than us, you know, say, putting out
16 just a press release and relying on just, you
17 know, a variety of media sources across the state
18 to cover it.

19 MR. MEREDITH: Can we just take a
20 quick break?

21 MR. SHAPIRO: Sure. Absolutely.

22 (3:55 p.m. BREAK 4:24 p.m.)

23 (Exhibit 7 marked)

24 BY MR. SHAPIRO:

25 Q Mr. Maglinger, I've given you what has been marked

1 A Yes.

2 Q And he or she will see a few comments underneath?

3 A Yes. To the best of my recollection, you do see a
4 couple of comments at least before they are
5 truncated there.

6 Q And so this exhibit that has multiple pages with
7 multiple comments, a user would not see those
8 immediately, they would first have to click
9 "see more comments," correct?

10 A Yes. I believe that is the case.

11 Q And with respect to those comments, are those
12 comments written by the Governor or the
13 Governor's staff?

14 A The comments, no, sir. Those would be -- appears
15 to be from users, Facebook users, accounts who are
16 interacting with our account.

17 Q And how is somebody able to distinguish between
18 the Governor's -- whether it is coming from the
19 Governor versus whether it is coming from a user?

20 A It would be, again, through that profile picture
21 and name there. So, for example, the Governor's
22 face there beside "Governor Matt Bevin" as opposed
23 to maybe "Sherri Matthews Stolle" there with her
24 picture, that would differentiate who the user
25 was.

1 Q And there is no approval process set up before a
2 comment appears?

3 A No, sir.

4 Q So anybody can post a comment and it immediately
5 shows up --

6 A Yes.

7 Q -- after posting that comment?

8 A Yes. I believe that is the case.

9 Q Okay. And the individual user decides what the
10 content is that's included in his or her comment?

11 A Yes, sir.

12 Q And, for example, there's 138 comments. If you
13 look on the first page it indicates there are 138
14 comments; is that correct?

15 A Yes.

16 Q And the Governor's ability to make another post is
17 not impacted by whether there's 138 comments or
18 100,000 comments; is that correct?

19 A Correct.

20 Q You are not aware of any limitation on the number
21 of comments that can be put on the Governor's
22 official Facebook page before he can no longer
23 access it?

24 A I have no knowledge of any limit that there is.

25 Q Okay. Let's put that away.

1 picture associated with the text of the tweet,
2 correct?

3 A Correct.

4 Q And we know for the reply that there is a user
5 image and a user name associated with each of
6 the -- the text of each reply, correct?

7 A That is correct.

8 Q And the user is able to understand exactly who the
9 author of the text is?

10 A Yes.

11 Q Okay. And, in fact, it even says it is replying
12 to Governor Matt Bevin?

13 A Yes.

14 Q Does the Governor's staff or the Governor ever
15 reply to comments within a reply?

16 A Not regularly. I don't recall myself ever doing
17 that. I don't believe that is a regular practice,
18 that we do reply back, as a standard -- in a
19 standard day. I don't think we do that.

20 Q But there are times when someone does?

21 A I believe I would probably have to defer to my
22 colleagues, if they had done that. But I have not
23 personally ever replied back to anyone.

24 Q But are you aware of times that you have seen when
25 someone on the staff or the Governor himself has

1 replied to a reply?

2 A Yes. I have seen that on very rather occasion.

3 Q Okay. As with Twitter -- as with Facebook --
4 strike that.

5 There's no prior approval required for
6 someone to post a reply on Twitter, correct?

7 A Correct.

8 Q And it shows up instantaneously, correct?

9 A Yes. Correct.

10 Q And the user is the one who decides the content of
11 their reply?

12 A Yes. That is correct.

13 Q And with this one, it doesn't -- there are 13
14 re-tweets or 13 replies; is that correct?

15 A Yes. Thirteen replies it shows.

16 Q And are you aware of any limitations if there are
17 a large number of replies?

18 A I am not aware of any limitation.

19 Q Okay. And whether there is 100 replies or 1,000
20 replies or 5 replies, the Governor still is able
21 to post on -- or you all or the Governor are still
22 able to post on the Governor's official Twitter
23 page?

24 A Yes. That is my understanding.

25 Q Okay. Earlier you said that you sometimes will

1 it in context for this deposition, did you?

2 THE WITNESS: No, not for the
3 deposition. This was before the -- I was
4 aware of a deposition.

5 MR. SHAPIRO: But you looked at --
6 all right.

7 BY MR. SHAPIRO:

8 Q Okay. So if you were looking at this post that
9 doesn't necessarily have a discernible topic and
10 you are looking for repeated off-topic comments,
11 is there a threshold number that you consider to
12 be a threshold?

13 A No. I don't have just a magic number on that.
14 I don't. It -- it usually becomes pretty readily
15 apparent when that's someone's intent and it is
16 pretty easy to see.

17 Q Was it more than two?

18 A Yes.

19 Q More than three?

20 A I would say once you -- once there are multiples,
21 once you get to three, that's where -- that's
22 where I would start looking at spam, particularly
23 on one single one, yes.

24 Q Okay. So less than three would be acceptable?

25 A Unless it was a persistent thing on going forward

1 from different posts, you know, that were
2 continued on. But if you are talking in the
3 context of one, one or two, at least I could speak
4 for myself specifically, I would not block that.

5 Q So others may have a different numerical
6 threshold?

7 A I would say you would have to ask that question of
8 them. I don't know.

9 Q But you are not aware that it is a consistent
10 number for everybody?

11 A The threshold that we kind of always just talked
12 about is that general statement we talked about
13 earlier with the continuous off-topic and
14 persistent.

15 Q Let's talk about the process for reinstating
16 someone's account. What is your understanding of
17 that process?

18 A We have, at least I know in one instance in my
19 experience, had a gentleman who contacted us.
20 I believe the initial inquiry came in through
21 constituent services, Mr. Park I mentioned
22 earlier, had either I guess sent an e-mail or a
23 letter just asking to be unlocked. And so I made
24 contact with that individual and e-mailed him and
25 let him know that if he was willing to abide by

1 the standard of what we were asking, that we would
2 be happy to unblock him with the understanding
3 that if he were to break those rules again that he
4 would be blocked. And he did reply back and agree
5 to those rules. And so I went through the process
6 of unblocking him. And to my knowledge, he's
7 still an active participant on our page.

8 Q And who created the policy of what you need to do
9 to be unblocked?

10 A We put out a statement to the media whenever this
11 case came -- came to light and news outlets were
12 requesting comment from us. And, so, we worked on
13 a statement to put out. And I used that general
14 language to reply back to the gentleman, just let
15 him know essentially what we're talking about,
16 those three things were what we blocked for and
17 that was the reason he had been blocked, but that
18 if he was willing not to participate in those
19 activities anymore we would be happy to unblock
20 him.

21 Q So prior to the initial news media reports about
22 this, was there any policy in terms of getting
23 unblocked from either Twitter or Facebook?

24 A I don't know of a written policy. We definitely,
25 like I say, since my time with the Governor's

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT

DREW MORGAN and MARY HARGIS,

Plaintiffs,

v.

MATT G. BEVIN, in his official
capacity as Governor of Kentucky,

Defendant.

Case No. 3:17cv00060

Electronically Filed

**DEFENDANT'S SUPPLEMENTAL RESPONSES TO PLAINTIFFS' FIRST
SET OF DISCOVERY REQUESTS**

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, the Office of the Governor (hereinafter, the "Defendant") hereby provides the following supplemental responses to the Plaintiffs' First Set of Interrogatories and First Set of Requests for Production of Documents:

GENERAL OBJECTIONS

1. The Defendant objects to the Plaintiffs' Definitions and Instructions to the extent they are inconsistent with the Federal Rules of Civil Procedure.

2. These responses are made solely for the purpose of this action. Each response is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and any and all other objections on grounds that would require the exclusion of any statement contained herein if any request was

asked of, or any statement contained herein was made by, a witness present and testifying at trial.

3. Except for the facts expressly admitted, no incidental or implied admissions are intended. The fact that the Defendant has responded or objected to any discovery or any part thereof should not be taken as an admission that the Defendant accepts or admits the existence of any facts set forth or assumed by such discovery or that such response or objection constitutes admissible evidence. The fact that the Defendant has not responded to part or all of any discovery is not intended, and shall not be construed to be, a waiver by the Defendant of all or any part of any objection to any discovery propounded herein.

4. The Defendant objects to each Interrogatory to the extent it seeks the production of information that was prepared in anticipation of litigation, constitutes attorney work-product, discloses mental impressions, conclusions, opinions, or legal theories of any attorney for, or other representative of, the Defendant, contains attorney-client communications, or is otherwise protected from disclosure under applicable privileges, laws, or rules because such information is not properly discoverable under the applicable civil rules. Any disclosure of such protected or privileged information in any response is inadvertent and shall not constitute a waiver of such privilege, protection, or immunity.

5. The Defendant objects to each Interrogatory to the extent it seeks information that is publicly available, is as equally available to, and/or is as readily accessible to the Plaintiffs as it is to the Defendant.

6. The Defendant objects to each Interrogatory to the extent it is duplicative of any information that the Plaintiffs already possess. The Defendant denies any obligation to collect information from any third parties in responding to each Interrogatory.

7. The Defendant objects to each Interrogatory to the extent it seeks information that is not within the scope of the civil rules.

8. The Defendant objects to each Interrogatory to the extent it is unduly burdensome or calculated to unreasonably burden or harass the Defendant.

9. The following responses are provided without prejudice to the production of subsequently discovered facts or evidence, reevaluation of the existing evidence, or evaluation of the existing evidence in light of newly discovered evidence. The Defendant reserves the right to supplement these responses.

10. These General Objections shall be deemed continuing throughout the Defendant's Responses to Plaintiffs Interrogatories, even if not specifically referenced in a response. Furthermore, if any particular response contains certain general objections, that fact shall not be construed as limiting the effect of any of these General Objections.

INTERROGATORIES

INTERROGATORY NO. 2: Please identify all employees, interns, or other personnel who have, from December 8, 2015, to present, had any involvement in

maintaining Governor Bevin's official Facebook ("GovMattBevin") or Twitter ("@GovMattBevin") accounts, and indicate the nature of that involvement.

RESPONSE: The Defendant objects to this Interrogatory to the extent that it requests the disclosure of attorney-client communications between the Defendant and his attorneys. Subject to that objection, the following individuals have been involved, at one time or another, in monitoring the Governor's social media accounts since December 8, 2015: Blake Brickman, Nicole Burton, Jessica Ditto, Catherine Easley, John Hodgson, Andrew King, Elizabeth Kuhn, Woody Maglinger, Chris Skates, Ben Goldey, Jordan Morgan, Taylor Sears, Kathryn Snavelly, Amanda Stamper, Leeann Veatch, Jenna Williams, John Zurowski, and Matthew G. Bevin. These individuals have been involved in: (1) posting content to the Governor's official Facebook and/or Twitter accounts, (2) blocking or banning accounts that have made obscene, abusive, and/or off-topic comments on the Governor's official Facebook and/or Twitter accounts, and/or (3) have deleted and/or hidden off-topic or inappropriate comments on the Governor's official Facebook account.

Respectfully submitted,

/s/ S. Chad Meredith
M. Stephen Pitt
S. Chad Meredith
Matthew F. Kuhn
Office of the Governor
700 Capital Avenue, Suite 101
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Steve.Pitt@ky.gov
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Matt.Kuhn@ky.gov
Counsel for the Defendant

VERIFICATION

The foregoing Responses to Plaintiff's First Set of Interrogatories are true to the best of my current knowledge.

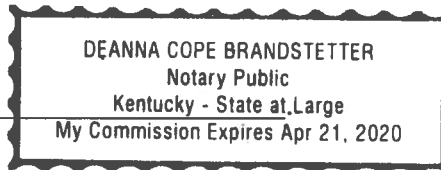
Nicole Burton
Nicole Burton

COMMONWEALTH OF KENTUCKY)

COUNTY OF FRANKLIN)

Subscribed, sworn to, and acknowledged before me by Nicole Burton on this
23 day of August, 2018.

My commission expires on



Deanna Cope Brandstetter
Notary Public



CERTIFICATE OF SERVICE

I served a copy of the foregoing via email on August 23, 2018 on the following:

Corey M. Shapiro
Heather L. Gatnarek
ACLU of Kentucky
315 Guthrie St., Suite 300
Louisville, KY 40202
corey@aclu-ky.org
heather@aclu-ky.org

/s/ S. Chad Meredith
Counsel for the Defendant

Chat (Off)

The screenshot shows the Facebook profile of Governor Matt Bevin. The top navigation bar includes links for Home, About, District, Posts, Videos, Photos, Community, Notes, Events, Info and Ads, and a search icon. The profile picture and cover photo are visible. A large blue banner at the top reads "MATT BEVIN". Below this, there are sections for "Page created on November 11, 2015", "Previously named Governor-Elect Matt Bevin", and "Primary country location of people who manage this Page includes: United States (12)".

A "Page History" pop-up window is open, displaying a list of changes:

- Changed name to Governor Matt Bevin
December 08, 2015
- Page created - Governor-Elect Matt Bevin
November 11, 2015

The pop-up has a "Close" button in the bottom right corner.

In the background, partially obscured by the pop-up, is a section titled "There Are No Ads to Show" with the text "This Page isn't running any ads in any country right now."

Governor Matt
Bevin 
[@GovMattBevin](#)

- [Home](#)
[About](#)
[District](#)
[Posts](#)
[Videos](#)
[Photos](#)
[Communi](#)
[Notes](#)
[Events](#)

Info and Ads

MATT BEVIN

UNITED WE STAND ★ DIVIDED WE FALL

Amesbury

Learn More

Active ads from Governor Matt Bevin

Facebook is showing you ads this Page is currently running to provide more transparency into advertising. Offers and pricing may not apply to you. [Learn more](#)

Page Information 6

- 📅 Page created on November 11, 2015
- 🔗 Previously named **Governor-Elect Matt Bevin**
[See Page History](#)
- 🌐 Primary country location of people who manage this Page includes: **United States (12)**

English (US) · Español · Português (Brasil)
Français (France) · Deutsch

Privacy · Terms · Advertising · Ad Choices · Chat (Off)
Cookies · More · Facebook © 2018

There Are No Ads to Show

This Page isn't running any ads in any country right now.



Tweets 5,997 Following 6 Followers 85.3K Likes 1,425 Follow

Governor Matt Bevin

@GovMattBevin

Governor of the Commonwealth of Kentucky

Kentucky, USA

governor.ky.gov

Joined April 2015

Tweet to Governor Matt Bevin

3,273 Photos and videos



Tweets Tweets & replies Media



Governor Matt Bevin · 44m

Enjoyed speaking to a great group yesterday at the Governor's Annual Conference on Energy and the Environment. Grateful to the dedicated members of @KentuckyEEC, who are working to address the energy needs of Kentuckians and protect the Commonwealth's abundant natural resources.



2 7



Governor Matt Bevin  @GovMattBevin · 15h
Was a beautiful day today in Frankfort...

Looking out of the Governor's mansion at the spectacular gardens below...

#WeAreKY



6



5




74



Governor Matt Bevin  @GovMattBevin · 19h
Considering adoption? It's worth it. #WeAreKY #AdoptKY



Catherine Hadro  @CatSzeltner
.@GovMattBevin is a father of 9, including 4 adopted children. Here's his message to other people who may be considering adoption -



1:08

6 26 76



Governor Matt Bevin @GovMattBevin · 23h

Kentucky's going to OWN it. That's the vision. We are already THE center of excellence in engineering and manufacturing in America, in many respects. [#WeAreKY messenger-inquirer.com/news/local/bev...](#)

8 14 46



Governor Matt Bevin @GovMattBevin · Oct 11

Grateful for the massive investment by Century Aluminum in Kentucky and the hundreds of resulting new direct and indirect jobs that will come as they restart (today!) one of their previously idled production lines in Hawesville...Kentucky is the aluminum capital of America!



2 28 86




Governor Matt Bevin @GovMattBevin · Oct 10

Please be careful tonight on Kentucky's highways...Avoid I-71 between Carrollton and Cincinnati in both directions if at all possible...Major accidents and major delays in both directions... [#WeAreKY](#)

2 18 48

10/12/2018

Governor Matt Bevin (@GovMattBevin) | Twitter


 **Governor Matt Bevin** ✓ @GovMattBevin · Oct 10
Should I shave or should I grow? Voting is officially closed and it looks like a clean shave is in my future. Thank you for your generosity, Kentucky...Stay tuned!
[#WeAreKY](#)



#WEAREKY

@GOVMATTBEVIN

14 7 59

 **Governor Matt Bevin** ✓ @GovMattBevin · Oct 10
Medicare for All!?!? Déjà vu. @SenSchumer & DC liberals want complete control of your access to healthcare. They destroyed healthcare for the middle class & lied about #Obamacare. They are still lying now...@realDonaldTrump is fighting to protect Medicare.

21 25 78



Governor Matt Bevin @GovMattBevin · Oct 10

Had the privilege of touring the Kentucky State Penitentiary in Eddyville yesterday w/ our Cabinet Secretaries, meeting w/ @KYCorrections staff & participating in a live training exercise.

Grateful to the dedicated & professional public servants who help keep KY safe...#WeAreKY



3 7 28



Governor Matt Bevin @GovMattBevin · Oct 10

Less than TWO hours left to decide if I should SHAVE or GROW! Voting closes at 11:00am ET. Don't miss your opportunity to support adoption and foster care programs through the First Lady's #WeAreKY Foundation! Donate/vote at: governor.ky.gov/shaveorgrow

24 10 31



Governor Matt Bevin @GovMattBevin · Oct 9

Pleased to announce a \$100,000 Recreational Trails Program grant through @DLG_KY today to benefit the Paducah-McCracken County community

Governor Matt Bevin (@GovMattBevin) | Twitter

[bit.ly/2y9A5xT](https://twitter.com/GovMattBevin/status/1051234567890123456)



1 15 48



Governor Matt Bevin @GovMattBevin · Oct 9

Thank you for your hospitality, McCracken County! Appreciate all the citizens who took time to participate in today's community forum at @WKCTC and discuss issues affecting our Commonwealth. #WeAreKY



4 9 31

10/12/2018

Governor Matt Bevin (@GovMattBevin) | Twitter



Governor Matt Bevin @GovMattBevin · Oct 9

Excited to join @KyTAHC in Paducah today to announce an innovative public-private partnership to tackle the Asian carp issue and encourage job growth in West Kentucky bit.ly/2Od1lm0



15



29



Governor Matt Bevin @GovMattBevin · Oct 9

Not in West Kentucky today? Watch our Paducah community forum live (via @WKCTC) >> facebook.com/WestKentucky/...



6



2



14



Governor Matt Bevin @GovMattBevin · Oct 9

Should I SHAVE or should I GROW, Kentucky? Just 1 day left to cast your vote ... and raise funds for the First Lady's #WeAreKY Foundation (supporting foster care/adoption)! [Donate/vote at: governor.ky.gov/shaveorgrow](https://governor.ky.gov/shaveorgrow)

24 HOURS
DONATE/VOTE

[HTTP://GOVERNOR.KY.GOV/SHAVEORGROW/](https://governor.ky.gov/shaveorgrow/)

10/12/2018

Governor Matt Bevin (@GovMattBevin) | Twitter

#WEAREKY

@GOVMATTBEVIN



8 7 16



Governor Matt Bevin @GovMattBevin · Oct 9

W/ a great group of men who are part of the leadership team taking care of things at @LakeBarkleySRP.. This state park is one of the most breathtaking spots in KY & is being refurbished for the first time in decades.. This is what new leadership in Frankfort does... #WeAreKY



10 13 60



Governor Matt Bevin @GovMattBevin · Oct 9

Looking forward to a great dialogue with citizens in the Paducah area this afternoon ... If you're available, come join the discussion at @WKCTC! #WeAreKY



Governor Matt Bevin (@GovMattBevin) | Twitter



4 10 19



Governor Matt Bevin @GovMattBevin · Oct 9

Early morning view from a room at @LakeBarkleySRP...One of many, incredibly beautiful and affordable gems in Kentucky's State Park system... #WeAreKY



5 7 64



Governor Matt Bevin @GovMattBevin · Oct 8

Enjoyed spending the evening with a great group in Muhlenberg County at a town hall discussing issues of importance to the local community.





8 6 50



Governor Matt Bevin @GovMattBevin · Oct 8
Are you or someone you know struggling with addiction?

Visit FindHelpNowKY.org

Call 1-833-8KY-HELP

Text HOPE to 96714


Get real-time substance use disorder treatment resources!

20 25


Who to follow
Refresh · View all




Matt Bevin



Follow



Leader Mc...
Follow



Kentucky ...
Follow



Find people you know
Import your contacts from Gmail

[Connect other address books](#)

Trends for you ·

Change

Kanye
Kanye West visits the White House to have lunch with President Trump

Quavo
191K Tweets

#FridayFeeling
96.8K Tweets

Big Blue Madness
1,266 Tweets

#FridayMotivation
26.5K Tweets

#NationalFarmersDay
5,132 Tweets

#FlashbackFriday
8,548 Tweets

#OnHalloweenImHandingOut
2,773 Tweets

#RoyalWedding
Princess Eugenie marries Jack

Brooksbank in another royal wedding

#LegalBands
3,275 Tweets

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT

DREW MORGAN and MARY HARGIS,

Plaintiffs,

v.

MATT G. BEVIN, in his official
capacity as Governor of Kentucky,

Defendant.

Case No. 3:17cv00060

Electronically Filed

**DEFENDANT'S RESPONSES TO PLAINTIFFS' FIRST SET OF
DISCOVERY REQUESTS**

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, the Office of the Governor (hereinafter, the "Defendant") hereby provides the following responses to the Plaintiffs' First Set of Interrogatories and First Set of Requests for Production of Documents:

GENERAL OBJECTIONS

1. The Defendant objects to the Plaintiffs' Definitions and Instructions to the extent they are inconsistent with the Federal Rules of Civil Procedure.
2. These responses are made solely for the purpose of this action. Each response is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and any and all other objections on grounds that would require the exclusion of any statement contained herein if any request was

asked of, or any statement contained herein was made by, a witness present and testifying at trial.

3. Except for the facts expressly admitted, no incidental or implied admissions are intended. The fact that the Defendant has responded or objected to any discovery or any part thereof should not be taken as an admission that the Defendant accepts or admits the existence of any facts set forth or assumed by such discovery or that such response or objection constitutes admissible evidence. The fact that the Defendant has not responded to part or all of any discovery is not intended, and shall not be construed to be, a waiver by the Defendant of all or any part of any objection to any discovery propounded herein.

4. The Defendant objects to each Interrogatory to the extent it seeks the production of information that was prepared in anticipation of litigation, constitutes attorney work-product, discloses mental impressions, conclusions, opinions, or legal theories of any attorney for, or other representative of, the Defendant, contains attorney-client communications, or is otherwise protected from disclosure under applicable privileges, laws, or rules because such information is not properly discoverable under the applicable civil rules. Any disclosure of such protected or privileged information in any response is inadvertent and shall not constitute a waiver of such privilege, protection, or immunity.

5. The Defendant objects to each Interrogatory to the extent it seeks information that is publicly available, is as equally available to, and/or is as readily accessible to the Plaintiffs as it is to the Defendant.

6. The Defendant objects to each Interrogatory to the extent it is duplicative of any information that the Plaintiffs already possess. The Defendant denies any obligation to collect information from any third parties in responding to each Interrogatory.

7. The Defendant objects to each Interrogatory to the extent it seeks information that is not within the scope of the civil rules.

8. The Defendant objects to each Interrogatory to the extent it is unduly burdensome or calculated to unreasonably burden or harass the Defendant.

9. The following responses are provided without prejudice to the production of subsequently discovered facts or evidence, reevaluation of the existing evidence, or evaluation of the existing evidence in light of newly discovered evidence. The Defendant reserves the right to supplement these responses.

10. These General Objections shall be deemed continuing throughout the Defendant's Responses to Plaintiff's Interrogatories, even if not specifically referenced in a response. Furthermore, if any particular response contains certain general objections, that fact shall not be construed as limiting the effect of any of these General Objections.

INTERROGATORIES

INTERROGATORY NO. 1: Please identify every person who assisted in the preparation of the responses to these discovery requests and provide each person's name, address, and telephone number.

RESPONSE: Woody Maglinger 700 Capitol Ave., Suite 102, Frankfort, KY 40601, 502-234-4888, with assistance of counsel; and Nicole Burton 700 Capitol Ave., Suite 102, Frankfort, KY 40601, 502-234-4699, with assistance of counsel. These individuals are employees of the Office of the Governor and may only be contacted through Defense counsel.

INTERROGATORY NO. 2: Please identify all employees, interns, or other personnel who have, from December 8, 2015, to present, had any involvement in maintaining Governor Bevin's official Facebook ("GovMattBevin") or Twitter ("@GovMattBevin") accounts, and indicate the nature of that involvement.

RESPONSE: The Defendant objects to this Interrogatory to the extent that it requests the disclosure of attorney-client communications between the Defendant and his attorneys. Subject to that objection, the following individuals have been involved, at one time or another, in monitoring the Governor's social media accounts since December 8, 2015: Blake Brickman, Nicole Burton, Jessica Ditto, Catherine Easley, John Hodgson, Andrew King, Elizabeth Kuhn, Woody Maglinger, Chris Skates, Ben Goldey, Jordan Morgan, Taylor Sears, Kathryn Snavely, Amanda Stamper, Leeann Veatch, Jenna Williams, John Zurowski. These individuals have been involved in: (1) posting content to the Governor's official Facebook and/or Twitter accounts, (2) blocking or banning accounts that have made obscene, abusive, and/or off-topic comments on the Governor's official Facebook and/or Twitter

accounts, and/or (3) have deleted and/or hidden off-topic or inappropriate comments on the Governor's official Facebook account.

INTERROGATORY NO. 3: Please identify all employees, interns, or other personnel who have, from December 8, 2015, to present, been involved in blocking individuals from Governor Bevin's official Facebook page.

RESPONSE: Please see the response to Interrogatory No. 2 above.

INTERROGATORY NO. 4: Please identify all employees, interns, or other personnel who have, from December 8, 2015, to present, been involved in blocking individuals from Governor Bevin's official Twitter page.

RESPONSE: Please see the response to Interrogatory No. 2 above.

INTERROGATORY NO. 5: Please identify any policy, written or otherwise, promulgated by or followed by your office governing individual users' activity on Governor Bevin's official Facebook page, and how that policy was relayed to Facebook users.

RESPONSE: The Governor's Office has a policy of disallowing comments that are obscene, abusive, or clearly off topic or spam.

In July 2017, the Governor's Office issued the following official statement:

"As we've said many times before, Gov. Bevin is a strong advocate of constructive dialogue, and he welcomes thoughtful input from all viewpoints on his

social media platforms. Unfortunately, a small number of users misuse those outlets by posting obscene and abusive language or images, or repeated off-topic comments and spam. Constituents of all ages should be able to engage in civil discourse with Gov. Bevin via his social media platforms without being subjected to vulgarity or abusive trolls. Blocking individuals from engaging in such inappropriate conduct on social media in no way violates their right to free speech under the U.S. or Kentucky Constitutions, nor does it prohibit them from expressing their opinion in an open forum.”

Additionally, the Governor made the following statements on Facebook addressing social media:

July 1, 2017:

<https://www.facebook.com/GovMattBevin/videos/1719065218393364/>

August 10, 2017:

<https://www.facebook.com/GovMattBevin/videos/1735771666722719/>

INTERROGATORY NO. 6: Please identify any policy, written or otherwise, promulgated by or followed by your office governing individual users’ activity on Governor Bevin’s official Twitter page, and how that policy was relayed to Twitter users.

RESPONSE: Please see the response to Interrogatory No. 5 above.

INTERROGATORY NO. 7: Please identify the process by which an individual Facebook user may be blocked from Governor Bevin's official Facebook page, including: how a decision is made to block the individual and who makes that decision; how or whether the individual is notified that they've been blocked; whether and how any record is maintained indicating why the user was blocked.

RESPONSE: The personnel who maintain Governor Bevin's Facebook page review the posts on the Governor's Facebook account, and if any comments to those posts are obscene or abusive, then the account that made the comments will be banned. If any comments are clearly off topic, they are hidden. However, if an account makes repeated off-topic comments, that account will be banned. If the social media user cannot see the Governor's Facebook page when logged into a particular Facebook account, then they know that the account has been banned from viewing the Governor's Facebook page. The Governor's Office possesses screenshots of many comments that resulted in an account being banned, but it does not possess any records indicating why the Plaintiffs' accounts were banned.

INTERROGATORY NO. 8: Please identify the process by which an individual Twitter user may be blocked from Governor Bevin's official Twitter page, including: how a decision is made to block the individual and who makes that decision; how or whether the individual is notified that they've been blocked; whether and how any record is maintained indicating why the user was blocked.

RESPONSE: The personnel who maintain Governor Bevin's Twitter account review the comments to the Governor's tweets, and if any of the comments violate the policy described above in response to Interrogatory No. 5, then the account that made such comment or comments will be blocked. If a social media user's Twitter account is blocked by the Governor's Twitter page, then the user will be informed of that fact when the user tries to view the Governor's Twitter page while logged into the blocked account. The Governor's Office possesses screenshots of many comments that resulted in an account being blocked, but it does not possess any records indicating why the Plaintiffs' accounts were blocked.

INTERROGATORY NO. 9: Please provide all information relating to the act of blocking Drew Morgan from Governor Bevin's official Twitter page, including, but not limited to, the bases for that action, the date he was blocked, and all persons involved in that action.

RESPONSE: Because this lawsuit was not filed until roughly six months after Mr. Morgan's account was allegedly blocked, the Defendant has no recollection of any facts indicating what specifically resulted in Mr. Morgan's account being blocked. Due to the passage of time, the Defendant is also unaware of who made the decision to block Mr. Morgan's account.

INTERROGATORY NO. 10: Please provide all information relating to the act of blocking Mary Hargis from Governor Bevin's official Facebook page, including, but

not limited to, the bases for that action, the date she was blocked, and all persons involved in that action.

RESPONSE: Because this lawsuit was not filed until roughly six months after Ms. Hargis's account was allegedly banned, the Defendant has no recollection of any facts indicating what specifically resulted in Ms. Hargis's account being banned. Due to the passage of time, the Defendant is also unaware of who made the decision to ban Ms. Hargis's account.

INTERROGATORY NO. 11: Identify all individuals who have been blocked from Governor Bevin's official Facebook page and the reason for the block. For each individual, provide the information in the format provided below.

RESPONSE: Objection. This interrogatory is irrelevant, overly broad, unduly burdensome, would require the defendant to speculate as to the actions of former employees, and is not proportional to the needs of the case. This is not a class action. Rather, it is simply a case with two plaintiffs. The only facts that are discoverable here are facts pertaining to the claims of those two particular individuals.

INTERROGATORY NO. 12: Identify all individuals who have been blocked from Governor Bevin's official Twitter page and the reason for the block. For each individual, provide the information in the format provided below.

RESPONSE: Objection. This interrogatory is irrelevant, overly broad, unduly burdensome, would require the defendant to speculate as to the actions of former

employees, and is not proportional to the needs of the case. This is not a class action. Rather, it is simply a case with two plaintiffs. The only facts that are discoverable here are facts pertaining to the claims of those two particular individuals.

REQUESTS TO PRODUCE

REQUEST NO. 1: A current list of all individuals blocked from Governor Bevin's official Facebook page.

RESPONSE: Objection. This Request is irrelevant, overly broad, and not proportional to the needs of the case.

REQUEST NO. 2: A current list of all individuals blocked Governor Bevin's official Twitter page.

RESPONSE: Objection. This Request is irrelevant, overly broad, and not proportional to the needs of the case.

REQUEST NO. 3: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to censorship practices on Governor Bevin's official Facebook page.

RESPONSE: Objection. The Defendant is unsure what the term "censorship practices" means. This request is vague, overly broad, and is not proportional to the needs of the case.

REQUEST NO. 4: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to censorship practices on Governor Bevin's official Twitter page.

RESPONSE: Objection. The Defendant is unsure what the term "censorship practices" means. This request is vague, overly broad, and is not proportional to the needs of the case.

REQUEST NO. 5: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to activity on Governor Bevin's official Facebook page by users other than Defendant or Defendant's employees.

RESPONSE: Objection. Responding to this request would potentially entail gathering tens of thousands of comments and searching through two-and-a-half years' worth of Facebook and Twitter comments. This Request is a fishing expedition, not a serious request for specific documents. If the Plaintiffs have a request for specific documents or a specific category of documents that pertain to their claims, the Defendant will be glad to consider such a request provided that it is consistent with the Rules of Civil Procedure. As it stands, this Request is vague, overly broad, unduly burdensome, and not proportional to the needs of the case.

REQUEST NO. 6: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to

activity on Governor Bevin's official Twitter page by users other than Defendant or Defendant's employees.

RESPONSE: Objection. Responding to this request would potentially entail gathering tens of thousands of comments and searching through two-and-a-half years' worth of Facebook and Twitter comments. This Request is a fishing expedition, not a serious request for specific documents. If the Plaintiffs have a request for specific documents or a specific category of documents that pertain to their claims, the Defendant will be glad to consider such a request provided that it is consistent with the Rules of Civil Procedure. As it stands, this Request is vague, overly broad, unduly burdensome, and not proportional to the needs of the case.

REQUEST NO. 7: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to decisions to block individual users from Governor Bevin's official Twitter page.

RESPONSE: Objection. This Request is irrelevant, overly broad, and not proportional to the needs of the case. The only issue in this case is whether the Defendant violated the First Amendment rights of the Plaintiffs by blocking or banning particular Facebook and Twitter accounts allegedly associated with them. The resolution of this issue is not informed in any way by the decision to block or ban any other accounts. This is an action brought by two particular Plaintiffs acting on behalf of themselves only, not a class. Thus, the only facts that are relevant are the facts pertaining to the blocking or banning of the Plaintiffs.

REQUEST NO. 8: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to decisions to block individual users from Governor Bevin's official Facebook page.

RESPONSE: Objection. This Request is irrelevant, overly broad, and not proportional to the needs of the case. The only issue in this case is whether the Defendant violated the First Amendment rights of the Plaintiffs by blocking or banning particular Facebook and Twitter accounts allegedly associated with them. The resolution of this issue is not informed in any way by the decision to block or ban any other accounts. This is an action brought by two particular Plaintiffs acting on behalf of themselves only, not a class. Thus, the only facts that are relevant are the facts pertaining to the blocking or banning of the Plaintiffs.

REQUEST NO. 9: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to the decision to block Mary Hargis from Governor Bevin's official Facebook page.

RESPONSE: The Defendant does not possess any responsive documents.

REQUEST NO. 10: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to the decision to block Drew Morgan from Governor Bevin's official Twitter page.

RESPONSE: The Defendant does not possess any responsive documents.

REQUEST NO. 11: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to any actions taken in connection with blocking Drew Morgan from Governor Bevin's official Twitter page.

RESPONSE: The Defendant does not possess any responsive documents.

REQUEST NO. 12: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to any actions taken in connection with blocking Mary Hargis from Governor Bevin's official Facebook page.

RESPONSE: The Defendant does not possess any responsive documents.

REQUEST NO. 13: The specific posts or writings made by Drew Morgan that caused Defendant to block Drew Morgan from Governor Bevin's official Twitter page.

RESPONSE: Objection. Because this lawsuit was not filed until roughly six months after Mr. Morgan alleges his account was blocked, the Defendant has no recollection of any facts indicating what specifically resulted in Mr. Morgan's account being blocked. Therefore, the Defendant is unable to respond to this request.

REQUEST NO. 14: The specific posts or writings made by Mary Hargis that caused Defendant to block Mary Hargis from Governor Bevin's official Facebook page.

RESPONSE: Objection. Because this lawsuit was not filed until roughly six months after Ms. Hargis alleges her account was banned, the Defendant has no recollection of any facts indicating what specifically resulted in Ms. Hargis's account being banned. Therefore, the Defendant is unable to respond to this request.

REQUEST NO. 15: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to any policies, procedures, or guidelines regarding Governor Bevin's official social media pages.

RESPONSE: Please see the response to Interrogatory No. 5 above.

REQUEST NO. 16: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to terms or words used to filter or block users from Governor Bevin's official Twitter page, including any lists of the terms or words themselves.

RESPONSE: The Defendant has no responsive documents.

REQUEST NO. 17: All documents, including, but not limited to, any communications, text messages, Facebook direct messages, or Twitter direct messages, relating to terms or words used to filter or block users from Governor Bevin's official Facebook page, including any lists of the terms or words themselves.

RESPONSE: Objection. This Request is irrelevant. The Defendant uses the Facebook word filter function, but that is the only fact that is relevant to the Plaintiffs' case. The specific words that are used in the filter are not relevant.

REQUEST NO. 18: All documents referenced in, relied on, or relating to, your responses to the Interrogatories.

RESPONSE: Objection. No such documents are relevant to the Plaintiffs' claims.

Respectfully submitted,

/s/ S. Chad Meredith

M. Stephen Pitt

S. Chad Meredith

Matthew F. Kuhn

Office of the Governor

700 Capital Avenue, Suite 101

Frankfort, Kentucky 40601

(502) 564-2611

Steve.Pitt@ky.gov

Chad.Meredith@ky.gov

Matt.Kuhn@ky.gov

Counsel for the Defendant

VERIFICATION

The foregoing Responses to Plaintiff's First Set of Interrogatories are true to the best of my current knowledge.

Nicole Burton
Nicole Burton

COMMONWEALTH OF KENTUCKY
COUNTY OF FRANKLIN

Subscribed, sworn to, and acknowledged before me by Nicole Burton on this 22
day of August, 2018.

DEANNA COPE BRANDSTETTER
Notary Public
Kentucky - State at Large

DEANNA COPE BRANDSTETTER
Notary Public
Kentucky - State at Large
My Commission Expires Apr 21, 2020

My commission expires on

Deanna Brando Fetter
Notary Public

CERTIFICATE OF SERVICE

I served a copy of the foregoing via email on August 22, 2018 on the following:

Corey M. Shapiro
Heather L. Gatnarek
ACLU of Kentucky
315 Guthrie St., Suite 300
Louisville, KY 40202
corey@aclu-ky.org
heather@aclu-ky.org

/s/ S. Chad Meredith
Counsel for the Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT
CASE NO. 3:17-CV-60-GFVT

DREW MORGAN and MARY HARGIS

PLAINTIFFS

V.

DEPOSITION FOR DEFENDANT

MATT G. BEVIN, in his official
capacity as Governor of Kentucky

DEFENDANT

* * * * *

DEPONENT: DREW MORGAN

DATE: OCTOBER 24, 2018

REPORTER: DENISE L. CLINE

CHUPPE SOERGEL ABELL & ARNOLD, LLC
COURT REPORTERS AND VIDEO SERVICE
2950 BRECKENRIDGE LANE, SUITE 11A
LOUISVILLE, KY 40220
(502) 459-4000 (800) 330-4098
FAX: (502) 459-4003 WEB: KYDEPO.NET
EMAIL: DLCLINE138@AOL.COM

1 **A I understand that, yeah.**

2 Q Fair enough, thank you. Okay, Mr.
3 Morgan, what is your educational background?

4 **A Some college.**

5 Q Okay.

6 **A I did a semester at University of**
7 **Kentucky in the mid '90s, a couple semesters at**
8 **Jefferson Community Technical College.**

9 Q And where did you go to high school?

10 **A Ballard High School here in Louisville.**

11 Q And what did you study at UK?

12 **A Business management.**

13 Q Okay. And did you get any degree from
14 the community college?

15 **A I did not.**

16 Q And what did you study there?

17 **A Business management also.**

18 Q Where do you live now?

19 **A In Jeffersontown. Louisville. East**
20 **end.**

21 Q In Jefferson County?

22 **A Jeffersontown, yeah.**

23 Q And Mr. Morgan, what is your occupation?

24 **A I am a patient care assistant and unit**
25 **coordinator at Norton Children's Medical Center.**

Drew Morgan

10/24/2018

Page 60

1 you have to information that you are going to look at
2 mixed in with a whole bunch of information that is
3 completely irrelevant to you?

4 MR. SHAPIRO: Objection. Lack of
5 foundation. Calls for speculation.

6 A I don't know. All these
7 hypotheticals -- I don't know what happens in the
8 Governor's office in the IT department or whoever's in
9 charge of Twitter.

10 Q Mr. Morgan, how has being blocked harmed
11 you?

12 A I can't engage with the Governor. I
13 can't see his posts unless I log out of my Twitter
14 account. Even if I log out, I can't reply to his posts
15 once logged out. Currently I cannot see nor reply to
16 them if I'm logged into my Twitter account. I can't
17 engage with my Governor as his constituent.

18 Q Well, that's not true, though,
19 literally, is it?

20 A On Twitter it is true.

21 Q You can write letters to the Governor's
22 office, right?

23 A I can.

24 Q You can call the Governor's office,
25 right?

1 **A I was not.**

2 Q Then why didn't you take any steps to
3 get unblocked?

4 **A I didn't know how at the time.**

5 Q So are you telling me that you thought
6 that filing a lawsuit would be easier than anything
7 else you could do to get unblocked?

8 MR. SHAPIRO: Objection. Asked and
9 answered.

10 **A Nothing is easier than one thing or the**
11 **other. I don't understand your question here. If**
12 **you're trying to get to the fact that I'm looking for**
13 **attention or something, that's not the case.**

14 Q Why did you file the lawsuit?

15 **A Because my First Amendment was blocked**
16 **by Governor Bevin. He's done it to multiple people in**
17 **this state.**

18 Q When did you get blocked?

19 **A February 8th, 2017.**

20 Q When was the lawsuit filed?

21 **A Was it July of 2017? June, July of**
22 **2017.**

23 Q So how many months is that from
24 February?

25 **A What, five?**



July 11, 2017

Matthew G. Bevin, Governor
Commonwealth of Kentucky
700 Capital Avenue, Suite 100
Frankfort, Kentucky 40601
fax: (502) 564-2517

Via first-class mail and facsimile transmission

RE: Request pertaining to use of social media

Dear Governor Bevin,

On behalf of the ACLU OF KENTUCKY and several affected Kentuckians, we write concerning your practice of permanently banning or blocking individuals from accessing or commenting on your official social media accounts. We believe that this practice, even if unrelated to the viewpoints expressed by those individuals, violates the free speech guarantees of the First Amendment to the U.S. Constitution and § 8 of the Ky. Constitution. Accordingly, we ask that you immediately cease permanently blocking or banning individuals from being able to engage in political speech on your official social media pages (your official "Governor Matt Bevin" Facebook page and your official @GovMattBevin Twitter account), *and* that you reinstate access to the hundreds of individuals who have already been blocked from those forums.¹

Specifically, while the use of social media is a relatively new phenomenon, it has quickly become a platform for individuals "to engage in a wide array of protected First Amendment activity on topics as diverse as human thought."²

¹ PHILLIP M. BAILEY AND MORGAN WATKINS, *Gov. Matt Bevin Blocks Hundreds on Facebook and Twitter*, <http://www.courier-journal.com/story/news/politics/2017/06/15/kentucky-gov-matt-bevin-blocks-hundreds-twitter-and-facebook/361281001/> (last visited July 7, 2017).

² *Packingham v. North Carolina*, 138 S.Ct. 2173, 2180 (U.S. June 19, 2017) (internal quotations and citation omitted).

RANDY STROBO, PRESIDENT | ERIN KENNEDY, VICE PRESIDENT | PATRICIA MINTER, SECRETARY
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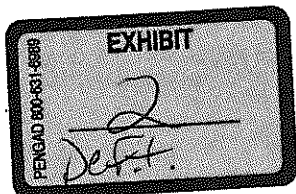


Exhibit 1

Recognizing the popularity and power of social media, you yourself have stated your intention to use it to connect with the public directly *in lieu of* utilizing traditional media outlets.³

However, in this medium, as in other public forum contexts, the Constitution protects individuals' speech rights and conversely limits government's ability to engage in content or viewpoint discrimination.⁴ This is particularly true for those individuals who access your social media pages to engage in political speech, which lies at the heart of the First Amendment's protections as does their right to receive the information you disseminate.⁵ Thus, because your official Facebook and Twitter pages are government-created public forums⁶ set aside for individuals to engage in and receive speech, you lack the authority to censor or otherwise block individuals from participating in these public forums simply because you disagree with the viewpoints they express.

Your spokesperson, Woody Maglinger, has indicated to a senior reporter for ProPublica that the decision to block individuals from these official online forums is not based on their expressed viewpoints, but rather because of posts that contain "obscene and abusive language or images, or repeated off-topic comments and

³ See e.g. GOVERNOR MATT BEVIN, "Media Exposed (Part One)" and "Media Exposed (Part Two)" videos, posted on June 15, 2017, both available at https://www.facebook.com/pg/GovMattBevin/videos/?ref=page_internal.

⁴ See *Packingham*, 198 L.Ed.2d at 282 ("In sum, to foreclose access to social media altogether is to prevent the user from engaging in the legitimate exercise of First Amendment rights."); *Perry Educ. Ass'n v. Perry Loc. Educators' Ass'n*, 460 U.S. 37 (1983); *Rosenberger v. Rector and Visitors of University of Virginia*, 515 U.S. 819 (1994).

⁵ *Snyder v. Phelps*, 562 U.S. 443, 451-52 (2011) ("[S]peech on matters of public concern . . . is at the heart of the First Amendment's protection."); *Stanley v. Georgia*, 394 U.S. 557 (1969) (First Amendment protects right to receive information); *Neinast v. Bd. of Trs. of the Columbus Metro. Library*, 346 F.3d 585 (6th Cir. 2003).

⁶ Though some have argued that government-created social media accounts do not constitute designated or limited public forums for which First Amendment protections would apply, we disagree. See *Davison v. Loudoun County*, 2016 WL 4801617 at *7 (E.D. Va. Sept. 14, 2016) ("Once it has opened a limited forum, the State must respect the lawful boundaries it has itself set...This rule applies as much to Defendants' Facebook page as to any other limited public forum.").

spam.”⁷ First, even if true, we do not think that has always been the case. Take, for example, the case of Drew Morgan. In early February, 2017, news broke regarding the property taxes owed on your Cherokee Gardens home.⁸ Mr. Morgan, a Kentuckian and former follower of your official Twitter account, commented on a number of your Twitter posts and inquired about the status of those property taxes.⁹ Then, on February 8, 2017, you (or someone acting on your behalf) permanently blocked him from your official Twitter account,¹⁰ and he remains blocked as of this date. None of Mr. Morgan’s comments on your Twitter account were obscene, abusive, or defamatory, nor were they “off-topic.” Instead, it appears that your office permanently blocked Mr. Morgan from your official Twitter account simply because of his viewpoint and the questions he posed. This resulted in Mr. Morgan being unable to engage in political speech on your official account, and being unable to share (or re-Tweet) your officials posts.

Similarly, Tristan Williams was blocked from your official Twitter account in early January, 2017. Just prior to being blocked, Ms. Williams had expressed her concerns about your policies about women’s health, particularly concerning reproductive health care. And in response to your Tweet encouraging protection for the unborn, Ms. Williams criticized, in a non-threatening, non-obscene, and non-defamatory way, your administration’s policies relating to children who have already been born.¹¹ Ms. Williams first noticed that she was blocked from your official Twitter account on January 7th, and she, too, has been blocked ever since.

Moreover, *Kentuckians Against Matt Bevin* is a public Facebook page on which political articles, blogs, and commentary are gathered. Currently, 1,827 people “like” the page, which means they follow this page and its posts appear in their timelines. The page began on April 1, 2016, but it was blocked from your official Facebook page less than a month later. Although quite clearly critical of

⁷ Posting of CHARLES ORNSTEIN to Twitter, <https://twitter.com/charlesornstein/status/874707071572168704> (June 13, 2017, 12:26 EST).

⁸ See e.g. MATTHEW GLOWICKI, *Records: Gov. Bevin, Wife Owe \$11K in 2016 Property Taxes*, *Courier-Journal*, Feb. 8, 2017. Available at <http://www.courier-journal.com/story/news/politics/2017/02/08/kentucky-governor-matt-bevin-wife-owe-11k-2016-property-taxes/97652528/> (last accessed July 6, 2017).

⁹ See attached Exhibit 1.

¹⁰ *Id.* at 2.

¹¹ See attached Exhibit 2.

your administration, the posts on this page were not (and are not) vulgar, obscene, or abusive.¹² Rather, this page engages in core political speech that is fully protected by the Constitution notwithstanding that it is critical of your administration's policies.

We think these examples fairly establish your office has, in fact, blocked individuals' access to your official social media accounts because of a disagreement with the messages they expressed. However, even crediting your office with blocking individuals for reasons wholly unrelated to the viewpoints they have expressed, permanently banning those individuals from engaging in the public forum nonetheless violates the First Amendment because a permanent ban lacks the requisite narrow tailoring for any legitimate speech restriction, and because it is tantamount to an unlawful prior restraint on speech.¹³

As Governor, you have made clear how highly you value direct engagement with constituents across the state. You certainly can appreciate, therefore, the importance of not unlawfully (or permanently) blocking individuals' access to the very platforms that you use to do so. Where public forums such as your Facebook and Twitter pages have been opened, traditional First Amendment protections apply and must be protected. Permanently blocking or banning users such as Mr. Morgan, Ms. Williams, and *Kentuckians Against Matt Bevin* (whether based on the viewpoints they express or for any other reason) violates the First Amendment, and we ask that you immediately unblock these three, and the hundreds of others who have likewise been blocked. We further request that your office adopt, and publicize, a constitutionally-sound policy regarding the moderation of these online public forums.

¹² See attached Exhibit 3.

¹³ See *Barna v. Bd. of Sch. Dirs.*, 143 F. Supp. 3d 205, 216 (M.D. Pa. 2015) ("Those courts that have confronted this issue in the context of a challenge to a prohibition on future expression because of past unlawful conduct have found such prohibitions unlawful."); *Cyr v. Addison Rutland Supervisory Union*, 60 F. Supp. 3d 536, 548 (D. Vt. 2014) ("A categorical ban of a single individual from open school board meetings, however, is not narrowly tailored and does not leave open ample alternative channels of communication."); *Brown v. City of Jacksonville*, 2006 U.S. Dist. LEXIS 8162, 2006 WL 385085 (M.D. Fla. 2006) (granting preliminary injunction barring City Council from enforcing three-month attendance ban against plaintiff from attending City Council meetings). See also *Huminski v. Corsones*, 396 F.3d 53, 92 (2d Cir. 2004) ("categorical ban on expressive speech singling out an individual does not even satisfy the lower threshold of reasonableness review" for a nonpublic forum).

Because of the importance of individuals' speech rights, we request that you notify us, in writing, within ten (10) days of the date of this letter regarding whether (or not) your office will: 1) unblock *all* of the hundreds of individuals who have been blocked from your official Twitter and Facebook forums; 2) abandon the policy of permanently blocking individuals from these forums; and 3) develop and publicize written criteria for how your administration will moderate these online forums moving forward. Failure to respond within that timeframe will be construed as a rejection of our requests. Thank you in advance for your attention to this matter, and we look forward to your reply.

Sincerely,




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Drew Morgan February 8, 2017, Twitter comments and block

Gov. Matt Bevin @GovMattBevin Feb 8
We are to be the best version of ourselves it's going to take us doing simple things the hard way the golden rule #SOTC17 #WeAreKY

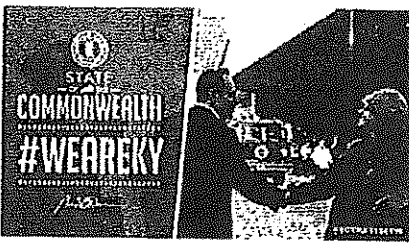


3 likes

Drew Morgan @OnlyDrewM
Replying to @GovMattBevin
and paying our property taxes
6:31 PM - 8 Feb 2017

3 likes

Gov. Matt Bevin @GovMattBevin Feb 8
Take pride in your state Take pride in your community #SOTC17 #WeAreKY



3 likes

Drew Morgan @OnlyDrewM
Replying to @GovMattBevin
take pride in paying the taxes on your house
6:43 PM - 8 Feb 2017

3 likes

Gov. Matt Bevin @GovMattBevin Feb 8
Repeating the prevailing wage has already saved Kentuckians so much money #SOTC17 #WeAreKY



3 likes

Drew Morgan @OnlyDrewM
Replying to @GovMattBevin
would it be enough to cover what you owe on your house?
6:33 PM - 8 Feb 2017

4 likes

Gov. Matt Bevin @GovMattBevin Feb 8
Charter schools are coming to Kentucky and this will be good for the state #SOTC17 #WeAreKY


3 likes

Drew Morgan @OnlyDrewM
Replying to @GovMattBevin
what would be better would be to stop cutting funding to schools and oh yeah pay your taxes on your house
6:32 PM - 8 Feb 2017

1 Retwit 3 Likes

[illegible]

Drew Morgan (@D5555555) Feb 6
Replying to @5624re
guess he didn't like me telling him to pay his taxes on every hotel night or
posting the screen shot of his tax bill




WANTED
MATT BEVIN
FUGITIVE


**BECOMING THE
BEST
VERSION
OF OURSELVES**


Governor Matt Bevin
@GovMattBevin


You can find the full transcript of the interview with Governor Matt Bevin's Facebook page here.


Tristan Williams January 4-7, 2017, Twitter comments and block

 Governor Matt Bevin @GovMattBevin Jan 5
We must continue to be vigilant in our efforts to protect the rights of the unborn child.

 Tristan @_Desiree9 Jan 6
What measures are you taking to help prevent unwanted/unintended pregnancies? Great access to birth control?

 Tristan @_Desiree9 Jan 6
Right. You have it cut for planned parenthood programs. States show access to birth control reduces abortions. You care? Huh?

 Tristan @_Desiree9 Jan 6
you are a fake of a governor and care only about your political ambitions, not the people who are struggling to get by.


 Tristan @_Desiree9


Replying to @GovMattBevin

you've done absolutely nothing to help them & try to take away what little they have by taking their healthcare & cutting ed.

7:26 PM - 5 Jan 2017

1 Like

 Governor Matt Bevin @GovMattBevin Jan 5
We must continue to be vigilant in our efforts to protect the rights of the unborn child.


 Tristan @_Desiree9


Replying to @GovMattBevin


again. How are you going to help them once they're born?? Snap? #Education? #Healthcare? What are you doing for them?


2:22 AM - 6 Jan 2017

1 Like

 Governor Matt Bevin @GovMattBevin Jan 4
There is nothing more American than the freedom of choice.

 Sally (@sally91) Jan 4
how about some choice for Kentucky women who you're at 277211, 117

 Daddy (@Daddy114) Jan 4
how about protecting unborn babies


 Tristan @_Desiree9

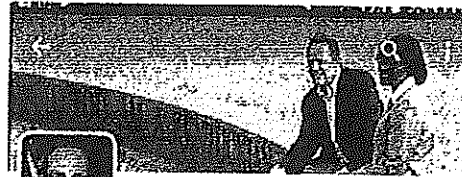
Replying to @GovMattBevin

how about protecting the ones that are already here? Food? Healthcare? Education?

7:11 PM - 4 Jan 2017

5 Replies 145 Likes

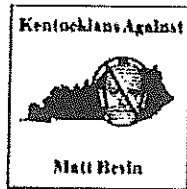
 Tristan @_Desiree9 Jan 7
I guess talking about something I feel strongly about gets me blocked by the governor.



Governor Matt Bevin
@GovMattBevin

You are blocked from following @GovMattBevin and viewing @GovMattBevin's Tweets. [Learn more](#)

Kentuckians Against Matt Bevin Facebook posts and block



Kentuckians Against Matt Bevin

of Kentuckians Against Matt Bevin

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Kentuckians Against Matt Bevin

April 19, 2019

Excellent piece. A must read

"Sometimes I feel discouraged, but Kentucky deserves better. I know that Kentuckians have the solutions. People want to connect, they want to build new economies in their communities and get things done. But no one has enough money to make a real difference, and budgets keep getting cut. If we want to really address these issues, then we need a bigger budget."

Gov. Matt Bevin and many of our legislators want to pass a plan that gives more tax breaks to corporations and the 1 percent. They also want to tax groceries, which will hurt Kentuckians who already don't have enough to eat. Our Governor wants to attract business and bring improvements to the economy that we desperately need. But instead of bringing in outsiders, we have the option to invest in ourselves. We can write a budget that puts our tax dollars to work in our local towns, where everyday Kentuckians can take the lead in shaping our communities.

Take a look at your neighbors—Together we have the solutions to our communities' challenges. We need our state government to write a tax code that invests in us and values us; one that puts our tax dollars back into our communities and not into corporations' profits. As we all file our taxes, we need to remember what our tax dollars fund that make our communities better for everyone. Pay attention, because this is what our Governor wants to re-write our tax structure, and it may hurt you and me.

If this concerns you, I encourage you to make your voice heard. Calling your legislators is a place to start. So is talking with your families, friends, and neighbors about what you'd like to see happen in the state of Kentucky. Get to know your city council, or join grassroots groups like Kentuckians for the Commonwealth. Kentuckians are doing amazing things every day, and I know we have the ability to create thriving communities.

Here's to a better future."

http://www.kytribune.com/... Lauren-gabbard-kentucky-has pr /



Lauren Gabbard: Kentucky has problems, people need to get involved, work together to find

Send Message

Community

1. Invite your friends to like this Page

16 1,828 people like this

16 1,827 people like this

16 Angela Efferman likes this

16

About

See All

1. Typically replies within an hour

Send Message

1. kyanaroblogspot.com

1. Community

People Also Like



Matt Bevin

Politics

16 Like



Andy Beshear

Politics

16 Like



Watching Matt Bevin F...

Community

16 Like

Pages liked by this Page



Kentucky Young Dem...

16 Like

Kentuckians Against Matt Bevin

Home About Photos Likes Videos Posts

Kentuckians Against Matt Bevin

Matt Bevin was one of 2 Republican governors who signed the letter to Pruitt which resulted in the reversal of course. Bevin proving once again that corporations, like big oil & gas, matter more to him than our people or our planet.

*Four Democratic senators have asked U.S. Environmental Protection Agency (EPA) Administrator Scott Pruitt to explain why he told lawmakers during his confirmation hearing that he would examine the issue of collecting information from the oil and ... See More

LOCATION

Democratic Senators Ask EPA's Pruitt to Explain Reversal on Emissions Data From Industry

Four Democratic senators have asked U.S. Environmental Protection Agency (EPA) Administrator Scott Pruitt to explain why he told lawmakers during his confirmation hearing that he would examine the issue of collecting information from the oil and ... See More

Send Message

Matt Bevin 16 Like

Andy Beshear 16 Like

Watching Matt Bevin F... 16 Like

Kentucky Young Dem... 16 Like

New Feminist South 16 Like

Kentucky Democra... 16 Like

English (US) · Español · Português (Brasil) · Français (France) · Deutsch

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Kentuckians Against Matt Bevin was feeling amused.

April 19, 2016 · 63

I've officially been banned from commenting on Governor Matt Bevin's official Facebook page. Surely there's been a mistake! :p #Bevin #kygov #oopsies #LOL

84 people reached

Boost Post

Uinda McLeod, Charles Caldwell and 6 others · 2 Comments

Like Comment Share

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT
No. 3:17-CV-60-GFVT

DEPOSITION OF MARY DEANA SHARP HARGIS

DREW MORGAN and MARY HARGIS PLAINIFFS

v.

MATT G. BEVIN, in his official capacity DEFENDANT
as Governor of Kentucky

The deposition of MARY DEANA SHARP HARGIS was taken on behalf of the defendant before Rebecca Fella, Registered Professional Reporter and Notary Public in and for the Commonwealth of Kentucky at Large, at the office of Ransdell, Roach & Royse, PLLC, 176 Pasadena Drive, Building I, Lexington, Kentucky, on Thursday, November 1, 2018, beginning at the hour of 1:00 p.m. The deposition was taken by notice and shall be used for any and all purposes allowed by the Federal Rules of Civil Procedure, including use at trial.

ACTION COURT REPORTERS
116 Mechanic Street
Lexington, Kentucky 40507
(859) 252-4004

Mary Hargis
11/1/2018

1 Morehead?

2 A. I've been in Morehead since 1975, when I
3 got married.

4 Q. Okay. And what do you do for a living,
5 Ms. Hargis?

6 A. I'm a retired Kentucky State employee.

7 Q. And how long did you work for the State?

8 A. Twenty-seven years.

9 Q. And when did you retire?

10 A. 2008, May 31st.

11 Q. Okay. And what did you do for the State?

12 A. I was a clerical support person for the
13 Commission for Children With Special Health Care Needs,
14 part of the Cabinet for Health and Family Services.

15 Q. And did you work in an office in Morehead
16 or did you drive to Frankfort --

17 A. No --

18 Q. -- every day?

19 A. -- in Morehead.

20 Q. Okay.

21 A. The home office was in Louisville.

22 Q. So you said you worked 27 years, so does
23 that mean then that you started working there in 1981?
24 Is that --

25 A. I worked previously at the health

Mary Hargis
11/1/2018

1 representation.

2 You cannot -- you cannot make an
3 unsolicited email privileged.

4 MR. SHAPIRO: I am objecting to the
5 extent that email is --

6 Q. Ms. Hargis, what did the email say?

7 A. Just that --

8 MR. SHAPIRO: You can answer the
9 question.

10 THE WITNESS: Huh?

11 MR. SHAPIRO: You can answer that
12 question.

13 A. It was that I was on a list of blocked
14 people from the governor's page and that would I be
15 interested in trying to be able to become involved.

16 Q. Prior to that point, had you -- had you
17 contemplated filing a lawsuit?

18 A. I didn't know I was blocked until a couple
19 of days prior to that.

20 Q. So you weren't -- you didn't even know you
21 were blocked until you got that email?

22 A. No, I knew -- I didn't understand that I
23 was blocked. I only knew that I could share. So I -- I
24 wasn't aware of what that meant at that time, but then
25 when I found out I was actually blocked, then I

Mary Hargis

11/1/2018

1 understood that was why I could only share.

2 Q. And how did you find out you were blocked?

3 A. Through the ACLU.

4 Q. Was it that email or another communication?

5 When I say that email, I mean the email
6 from Ms. Gatnarek on the 24th.

7 A. Through --

8 Q. Through that --

9 A. -- that email.

10 Q. Okay. So that was the first time you
11 understood that you were blocked?

12 A. That I actually understood that I was
13 blocked, yes.

14 Q. Okay.

15 A. I didn't understand the process prior to
16 that because I'd never been blocked from anything, and
17 so when all I could do was share, I was -- I didn't
18 understand why.

19 But there's no way to question that on
20 Facebook when you see that unless you know or are aware
21 of what that means, and I didn't -- I was unaware of
22 what that meant.

23 Q. Did you respond to Ms. Gatnarek's email?

24 MR. SHAPIRO: I'm going to object to
25 the -- you can answer that question.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT
CASE NO. 17-CV-00060

DREW MORGAN AND MARY HARGIS

PLAINTIFFS

v.

MATT G. BEVIN, IN HIS OFFICIAL
CAPACITY AS GOVERNOR OF KENTUCKY

DEFENDANT

* * *

The 30(b)(6) deposition of **JAMES BLAKE BRICKMAN** as taken pursuant to notice by the plaintiff on October, 25, 2018, at the Kentucky State Capitol Building, Room 107, 700 Capital Avenue, Frankfort, Kentucky.

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*

*

*

1 JAMES BLAKE BRICKMAN, called by the
2 Plaintiff, having been first duly sworn, testified
3 as follows:
4

5 EXAMINATION

6
7 BY MS. GATNAREK:

8 (Proceedings Commenced at 8:08 a.m.)

9 Q. Could you introduce yourself for the record,
10 please?

11 A. James Blake Brickman.

12 Q. And your last name is spelled as it sounds?

13 A. "Brick" "man."

14 Q. Great. Have you ever been deposed or
15 testified before, Mr. Brickman?

16 A. No.

17 Q. This is the first time?

18 A. First time.

19 Q. Great. Are you here with counsel today?

20 A. I am.

21 Q. And is that Mr. Meredith and Mr. Kuhn --

22 A. Yes.

23 Q. -- sitting to your right?

24 A. Yes.

25 Q. Excellent. Let me just go over a few basics

1 of the deposition, and then we can get started.

2 First of all, we have a court reporter here
3 today, who is making a transcript. So we need
4 affirmative answers to questions, a yes or a no as
5 opposed to a head shake or a head nod.

6 If any question that I ask you is unclear or
7 if you don't understand what I mean, please let me
8 know or ask me to clarify. I'm very happy to do
9 that, and it's probably because I have not asked the
10 question correctly or appropriately.

11 Because we have a court reporter who's making
12 a record, it's important that we not talk over each
13 other, we let each other finish before the other one
14 speaks. Otherwise, that garbles the record.

15 If you need to speak with your attorneys, you
16 are free to do so. I just ask that you answer the
17 question that is pending first, before requesting
18 time to speak with your attorneys. So don't leave a
19 question pending.

20 And the same is true with breaks. If you
21 ever need a break, please let us know. We can do
22 that. Just please don't leave a question pending
23 before the break.

24 And is there any reason that you cannot
25 answer -- or cannot testify truthfully today, any

1 medications or anything that --

2 A. No.

3 Q. -- would impact that? Okay.

4 And, Mr. Brickman, you are here today as the
5 governor's 30(b)(6) designee; is that correct?

6 A. Yes.

7 Q. So you're here to give official testimony on
8 behalf of the office of the governor; is that
9 correct?

10 A. Yes.

11 Q. Because you haven't testified as -- in a
12 deposition before, I take it that you have not
13 testified as a corporate designee before; is that
14 correct?

15 A. Correct.

16 Q. Okay. I will mark as Exhibit -- I think
17 we're on 28, we've done these consecutively -- a
18 document that we will mark as Exhibit 28.

19 (EXHIBIT 28 WAS MARKED FOR IDENTIFICATION.)

20 Q. And I'll hand this to you to take a look at
21 and ask if you've seen this document before?

22 A. I have.

23 Q. And this is the notice of your deposition
24 here today; is that correct?

25 A. Yes.

1 Q. And then you'll see, starting on page 2,
2 there are a list of topics, and they go from page 2
3 onto page 3.

4 Do you see those?

5 A. Yes.

6 Q. Great. Mr. Brickman, when did you become
7 aware that you would be representing the governor as
8 the corporate designee in this case?

9 A. Last week.

10 Q. Okay. And how much time did you spend
11 preparing for this deposition today?

12 A. Three hours, at least.

13 Q. What did you do to prepare?

14 And I'm not asking for -- well, what did you
15 do to prepare?

16 MR. MEREDITH: Objection to the extent it
17 calls for disclosure of attorney-client
18 communications.

19 A. I reviewed this document.

20 Q. Did you review any other documents?

21 A. I reviewed the answer to the complaint.

22 Q. Anything else?

23 A. I reviewed the response to interrogatories.

24 Q. Do you know if those were the defendant's
25 responses to interrogatories, or the plaintiffs'?

1 A. They were the defendant's responses.

2 Q. Did you review anything else?

3 A. No.

4 Q. And who did you speak to in order to prepare
5 for today's deposition?

6 A. I spoke with the governor.

7 Q. Okay. For how long did you speak to the
8 governor?

9 A. 30 minutes.

10 Q. Anyone else?

11 A. And I talked to our attorneys, but --

12 Q. Anyone else?

13 A. I spoke with our communications director.

14 Q. And who is that?

15 A. Elizabeth Kuhn.

16 Q. How long did you speak to Ms. Kuhn for?

17 A. When? I speak to Ms. Kuhn daily.

18 Q. In preparation for this deposition.

19 A. I'm not sure I talked to her about the
20 deposition. I mean, I speak to Ms. Kuhn in my
21 regular role daily, multiple times a day.

22 Q. Have you spoken to her about this deposition
23 every day since you learned you'd be the designee?

24 A. No.

25 Q. So how many days have you spoken to her about

1 this deposition?

2 A. I haven't spoken to her directly about the
3 deposition.

4 Q. Have you spoken to her about the topics
5 identified in the notice of deposition?

6 A. Yes.

7 Q. When?

8 A. Yesterday.

9 Q. For how long?

10 A. At least 30 minutes.

11 Q. In addition to the governor, counsel, and
12 Ms. Kuhn, have you spoken to anybody else in
13 preparation for today's deposition?

14 A. No.

15 Q. Let's take a look at that document, what
16 we've now marked as Exhibit 28.

17 And I will, as a preliminary matter, show you
18 what we've marked previously as Exhibit --
19 Deposition Exhibits 2 and 3.

20 MS. GATNAREK: Do you-all need copies of
21 these again?

22 MR. MEREDITH: Yeah, if you don't mind.
23 Thank you.

24 MS. GATNAREK: You're welcome.

25 Q. Mr. Brickman, you understand that this case

1 regards the governor's official social media pages?

2 A. Yes.

3 Q. So when we discuss the governor's official
4 social media pages, I want to make sure that we're
5 all talking about the same thing.

6 Deposition Exhibit Number 2, can you just
7 identify this document for us, if you're able?

8 A. It looks like a screenshot of the governor's
9 official Twitter page.

10 Q. And how do you know it's the governor's
11 official Twitter page?

12 A. It's the @GovMattBevin Twitter handle.

13 Q. Okay. Because the governor also has a
14 personal Twitter page; is that correct?

15 A. It is.

16 Q. And I just want to be clear, that's not what
17 this is; this is his official --

18 A. This is the official Twitter account.

19 Q. Great. If you could take a look at the
20 Exhibit 3 underneath it and identify it for us, if
21 you're able?

22 A. This looks like the governor's official
23 Facebook page.

24 Q. And again, how do you know that's the
25 governor's official Facebook page?

1 A. It's the @GovMattBevin Facebook page.

2 Q. Does he also have a personal Facebook page?

3 A. He does.

4 Q. So today as we're discussing the official
5 Facebook and Twitter pages, I will be referring to
6 these accounts, and I just want to make sure that
7 you're in agreement that that's what we mean by
8 official Facebook and Twitter page.

9 Do you agree?

10 A. Yes.

11 Q. Excellent. When were the governor's official
12 Facebook and Twitter accounts created?

13 A. I don't know.

14 Q. Who would know?

15 A. I don't know.

16 Q. Did you ask anybody when they were created?

17 A. My understanding is they were created before
18 he became governor.

19 Q. Where does that understanding come from?

20 A. Because the @GovMattBevin Twitter handle on
21 the very page you handed me says it was created in
22 April of 2015. He was not governor until December
23 of 2015.

24 Q. Okay. So you don't know who, in April of
25 2015, created the governor's official Facebook page?

1 A. No, I don't.

2 Q. And do you know who would know who created
3 this page?

4 A. No.

5 Q. Did you ask Ms. Kuhn if she knows who created
6 that page?

7 A. No.

8 Q. Did you ask the governor who created the
9 page?

10 A. He didn't know.

11 Q. So you did ask him?

12 A. I did.

13 Q. And he didn't know who created that?

14 A. (Witness shook head.)

15 Q. Did you ask anyone else besides the governor
16 or Ms. Kuhn --

17 A. No.

18 Q. -- who created the page?

19 A. Again, it was created in April of 2015,
20 before I ever worked for the governor when he was --
21 before he was governor.

22 Q. I understand. But you are here as the
23 30(b)(6) designee to answer questions on behalf of
24 the governor's office, correct?

25 MR. MEREDITH: Objection to the extent you're

1 asking him to testify about things that happened
2 before the inauguration and, therefore, were not
3 official state business.

4 Q. Do you know who was involved in the decision
5 to create these pages?

6 A. No.

7 Q. Do you know who would know that?

8 A. No.

9 Q. Did you ask the governor?

10 A. No. He didn't know. I mean, I didn't -- he
11 created -- these were created before we ever became
12 employees of the governor's office. So I have no
13 idea who created them.

14 Q. So you did ask the governor if he knew who
15 was involved in creating them?

16 A. He had no recollection of creating these.

17 Q. How long have you worked for the governor?

18 A. Since day one of the administration.

19 Q. Do you have access to these official accounts
20 yourself?

21 A. No.

22 Q. Who was working for the governor at the time
23 this Facebook page was created that may know -- that
24 may be able to answer questions about it?

25 A. I don't know.

1 Q. Did you work for the governor's campaign?

2 A. No.

3 Q. You don't know anyone else who worked for the
4 governor's campaign?

5 MR. MEREDITH: Objection to the form.
6 Objection to the extent you're asking him to testify
7 about things beyond the scope of the 30(b)(6)
8 deposition.

9 Q. Do you know who worked for the governor
10 during the campaign, when this page was created?

11 MR. MEREDITH: Same objection, because none
12 of that pertains to official government business.

13 A. I did not work on the campaign.

14 Q. I understand that.

15 Do you know who did in April of 2015?

16 A. No.

17 MR. MEREDITH: Same objection. That's all
18 beyond the scope of the 30(b)(6) deposition.

19 Q. Do you know if the governor's official
20 Facebook and Twitter pages have been active
21 continuously since they were created?

22 MR. MEREDITH: Same objection.

23 Q. Do you know?

24 A. I don't know.

25 Q. Who would know?

1 A. I don't know.

2 Q. Did you ask the governor?

3 MR. MEREDITH: Same objection.

4 A. What is your question?

5 Q. Did you ask the governor if the official
6 Facebook and the official Twitter pages have been
7 active continuously since they were created?

8 MR. MEREDITH: Objection. That's all beyond
9 the scope of anything that's happened since the time
10 the governor was inaugurated, which is the only
11 scope of the 30(b)(6) deposition here.

12 Q. You can answer.

13 A. No.

14 Q. No, you didn't ask him if he knew who had --

15 A. Can you ask the question again?

16 Q. Did you ask the governor if he knows whether
17 the official Facebook and the official Twitter pages
18 have been active continuously since they were
19 created?

20 MR. MEREDITH: Same objection.

21 A. No.

22 Q. Do you know who is now responsible for those
23 accounts?

24 A. I do.

25 Q. Who?

1 A. For which account?

2 Q. Let's start with the Facebook.

3 MR. MEREDITH: Objection. When you say
4 "responsible," what do you mean?

5 Q. Who is responsible for it?

6 Who's in charge of it?

7 A. What do you mean "responsible"?

8 Q. Is there one person who has ultimate
9 authority over the governor's Facebook page,
10 official Facebook page?

11 A. The communications director's in charge of
12 all communications in the governor's office.

13 Q. And that would be Ms. Kuhn; is that correct?

14 A. Yes.

15 Q. Okay. Do you know if anybody else monitors
16 the governor's official Facebook page?

17 A. What do you mean by "monitor"?

18 Q. I mean has access to it as either an
19 administrator or a moderator?

20 A. What is an administrator?

21 Q. Do you know who has access to post on the
22 governor's official Facebook page?

23 A. Yes.

24 Q. Who?

25 A. Currently?

1 Q. Yes.

2 A. And you're asking about Facebook?

3 Q. Yes, I am.

4 A. Who can post content?

5 Q. Yes.

6 A. That's a current employee?

7 Q. Yes.

8 A. Nicole Burton, Elizabeth Kuhn, Woody
9 Maglinger, John Zurowski.

10 Q. Anybody else?

11 A. No.

12 Q. Okay. May I ask what it is that you're
13 referring to?

14 A. A sheet of people in our office that have
15 access to the governor's Facebook account.

16 Q. Did you create that document?

17 A. Yes.

18 MS. GATNAREK: May we have a copy of what the
19 witness is referring to?

20 MR. MEREDITH: Sure. You can see it.

21 MS. GATNAREK: Thank you.

22 Q. When did you create this document,
23 Mr. Brickman?

24 A. Yesterday.

25 Q. Can you tell me how you created it?

1 A. When you say I -- I did not create the
2 document.

3 Q. Okay. Who did?

4 A. The document was created and given to me.

5 Q. Do you know who created it?

6 A. I don't. I think counsel did.

7 MR. MEREDITH: I don't think that's -- I
8 don't think that's correct, no.

9 A. Did Ms. -- maybe Ms. Kuhn -- I think Ms. Kuhn
10 created this for me.

11 Q. Is Ms. Kuhn the one who gave it to you?

12 MR. KUHN: I'll represent that Ms. Burton
13 created the document.

14 Q. Did you ask her to create a document like
15 this?

16 A. I did.

17 Q. What did you ask her in particular?

18 A. Well, one of the questions you asked was who
19 had access to this. So I asked to create a document
20 of who had access to it so I could answer your
21 questions.

22 Q. And do you know how she created it, created
23 this document?

24 MR. MEREDITH: Objection. You're asking him
25 literally, like, what kind of word processor she

1 used or whether she was using her own personal
2 knowledge, or what?

3 Q. I mean more whether she was referring to her
4 own personal knowledge or something else, where she
5 gathered -- how she gathered this information.

6 A. I can't tell you definitively how she
7 gathered the information.

8 Q. Would she know if I ask her that question?

9 A. I can't answer what somebody else would or
10 wouldn't know. I assume that any type of social
11 media platform has an administrator that can show
12 who has access to do this.

13 Q. Is it your understanding that Ms. Burton is
14 an administrator like that?

15 A. Ms. Burton has access to our official Twitter
16 and our official Facebook pages.

17 Q. And she has access that you do not; is that
18 correct?

19 A. I don't have any access.

20 MS. GATNAREK: We will mark this as
21 Exhibit -- I think we're on 29.

22 (EXHIBIT 29 WAS MARKED FOR IDENTIFICATION.)

23 MS. GATNAREK: And I'm sure we'll refer back
24 to it.

25 Q. Do you know how people within the governor's

1 office are added to the Facebook page as
2 administrators?

3 A. No.

4 Q. Do you -- who would know that?

5 A. Ms. Kuhn.

6 Q. Do you know who makes the decision who will
7 be added to the governor's official Facebook and
8 Twitter page?

9 A. The communications director is responsible
10 for all the governor's communications.

11 Q. I understand.

12 A. So she would make that decision.

13 Q. Do you know how she decides?

14 A. No.

15 Q. Do you know who had access to the governor's
16 official social media accounts on day one of the
17 administration, when you started?

18 A. No. I mean, you're asking me do I know
19 who -- everyone that had access on day one? The
20 answer is no.

21 Q. Who would know?

22 A. On day one?

23 Q. Uh-huh.

24 A. Jessica Ditto was here on day one. I don't
25 know if she would know or not, but she was here on

1 day one.

2 Q. Okay. Do you know if the governor knows who
3 had access on day one?

4 A. I don't. I don't know.

5 Q. Did you ask him that question?

6 A. No.

7 Q. Do you know if he had access on day one?

8 A. I don't know.

9 Q. Did you ask him that question?

10 A. No.

11 Q. You were previously referring to document --
12 what we've now marked as Exhibit 29, you were
13 previously explaining who had access to post on the
14 governor's official Facebook page. I would like to
15 ask you the same question with regard to Twitter.

16 Who in the governor's office currently has
17 access to post on the governor's Twitter page?

18 A. Nicole Burton, Elizabeth Kuhn, Woody
19 Maglinger, John Zurowski, Governor Bevin.

20 Q. And I suppose just so that the record is
21 clear, the document that we're looking at that
22 Ms. Burton created for you, which we've marked as
23 Exhibit 29, has what looks like a key up at the top
24 with 1, 2, and 3; is that correct?

25 A. I don't know what a key is.

1 Q. Well, up at the top of this document there
2 are the numbers 1, 2, and 3.

3 Do you see those?

4 A. I do.

5 Q. And next to number 1 it says, "Equals post
6 content"; is that correct?

7 A. Yep.

8 Q. Next to number 2 it says, "Equals block or
9 ban based upon policy."

10 Do you see that?

11 A. I do.

12 Q. And then number 3, next to it says, "Delete
13 or hide off-topic or inappropriate Facebook
14 comments."

15 Do you see that?

16 A. I do.

17 Q. Can you explain to me what those numbers mean
18 on this document?

19 A. What what numbers mean?

20 Q. What the numbers 1, 2, and 3 up at the top
21 mean on this document.

22 A. Well, there's names on the document with
23 numbers next to each name. And whoever has access
24 to do 1, 2, or 3 is listed as having access to do 1,
25 2, or 3.

1 Q. So in that way these numbers are a key
2 because we can look at a person's name and see, for
3 instance, Nicole Burton, next to her name is a 1, 2,
4 3, that means she has access to do all of those
5 listed up at the top; is that correct?

6 A. Yes.

7 Q. Okay. Can you flip to the second page of
8 that document, please, and just explain to me what
9 the -- what that means?

10 It says at the top, "Current Twitter access"
11 with a list of names, and halfway down it says
12 "Current Facebook access" with a list of names.

13 Can you explain what that means?

14 A. Are you talking about Twitter or Facebook?

15 Q. Well, let's start with Twitter.

16 What does that mean, "Current Twitter access"?

17 A. These are the current employees in the
18 governor's office that can do either 1, 2, or 3 in
19 what you describe as a key.

20 Q. I'm confused because on the first page, under
21 Twitter, there is a longer list of names, many of
22 whom have numbers next to them, and they don't all
23 seem to be listed under current Twitter access on
24 the back.

25 So for instance -- well, can you explain to

1 me why that might be, if you know?

2 A. There are people -- what is your question?

3 Q. Why are there more people listed on the first
4 page under Twitter, with numbers next to their
5 names, than there are on the back under "Current
6 Twitter access"?

7 A. Some of these people no longer work for the
8 governor.

9 Q. Okay. And does that hold true for "Current
10 Facebook access" on the back there, as well?

11 A. I don't understand your question.

12 Q. You see there's a list of names under
13 "Current Facebook access" on page 2 -- or I'm sorry.
14 They're not numbered. On the reverse side.

15 Do you see that list of names on the reverse
16 side of this document?

17 A. Which names?

18 Q. Under "Current Facebook access."

19 A. I see the names.

20 Q. Right. And then on the front of the -- the
21 front page of this document, there are more names
22 listed under Facebook with numbers next to them, and
23 it looks like there are more names listed on the
24 front, and I was wondering if you could explain the
25 difference there as well.

1 A. Some of these people no longer work in the
2 governor's office.

3 Q. Okay. What is the governor's office official
4 policy about who can post on his official social
5 media accounts?

6 MR. MEREDITH: Objection. Are you asking who
7 has access or --

8 MS. GATNAREK: No.

9 Q. I'm asking: What is the policy of the
10 governor's office as to who can post on his account?

11 A. I'm not sure there is a policy.

12 Q. Well, not everybody in the governor's office
13 can post on his accounts; is that correct?

14 A. Correct.

15 Q. So I'm wondering what the policy is to
16 determine who gets that access.

17 A. The communications director makes that
18 determination.

19 Q. Do you know how she makes that determination?

20 A. I don't.

21 Q. Do you know who would know?

22 A. She would.

23 Q. Did you ask her that in preparation for
24 today's deposition?

25 A. Did I ask her what?

1 Q. What the governor's office official policy is
2 regarding who posts on his official social media
3 pages.

4 A. There is not an office policy. She makes
5 that determination.

6 Q. She is the communications director of the
7 governor's office, correct?

8 A. Correct.

9 Q. So if she has a policy or practice, that
10 would be the policy or practice of the governor's
11 office; is that correct?

12 A. I don't understand your question.

13 Q. Let me rephrase.

14 She makes that decision in her official
15 capacity as the governor's communications director,
16 right?

17 A. Makes what decision?

18 Q. Who has access to post on the social media
19 accounts.

20 A. Yes.

21 Q. Did you ask her what that policy or practice
22 is?

23 A. No.

24 MR. MEREDITH: Object. Are you asking
25 whether there's some written-down policy beyond what

1 her discretion --

2 MS. GATNAREK: I'm asking what's pretty
3 clearly marked as topic number 3 in our notice of
4 30(b)(6) deposition here.

5 MR. MEREDITH: Are you asking if there's
6 something beyond her own discretion?

7 MS. GATNAREK: Yes.

8 MR. MEREDITH: Okay.

9 A. No.

10 Q. And do you understand what her -- how her
11 discretion works or what she takes into account to
12 make those decisions?

13 A. I don't understand your question. I mean,
14 there's not a written policy.

15 Q. I understand there's not a written policy. I
16 do believe that there would be a practice, though;
17 is that correct?

18 She does make decisions about who gets access?

19 A. The communications director makes decisions
20 about who gets access.

21 Q. Right. What kinds of things does she take
22 into consideration in deciding whether someone gets
23 access?

24 A. I don't know.

25 Q. Did you ask her?

1 A. No.

2 Q. Who oversees posts that are made to the
3 governor's official social media accounts?

4 A. What do you mean by "oversee"?

5 Q. Is there someone who is in charge of
6 deciding -- of making the ultimate decision what is
7 posted to these accounts?

8 A. The communications director.

9 Q. What is the official policy or practice by
10 which those decisions are made?

11 A. What decisions?

12 Q. What gets posted to the governor's official
13 social media accounts?

14 A. It's up to the discretion of the
15 communications director.

16 Q. Do you know how that discretion works or what
17 considerations she takes into account?

18 A. I don't.

19 Q. Who would know?

20 A. She would.

21 Q. And did you ask her about that?

22 A. About what?

23 Q. About how she oversees or makes ultimate
24 decisions about what gets posted to the official
25 accounts?

1 A. No.

2 Q. Do you know if -- strike that.

3 Since the governor has been in office, have
4 there been any changes made to the internal policy
5 or practice regarding who has access to post on the
6 official social media accounts?

7 MR. MEREDITH: Object to the form of the
8 question.

9 A. Was that a question?

10 Q. Yes, I think so.

11 MS. GATNAREK: Could you read that back,
12 please?

13 (Reporter read from the record as requested.)

14 MR. MEREDITH: Object to the form of the
15 question to the extent it lacks foundation and
16 assumes that there is some policy or practice other
17 than what he's already testified to.

18 MS. GATNAREK: He is the 30(b)(6) designee,
19 so I don't know that the lack of foundation is
20 applicable here.

21 Q. But please answer.

22 A. I still don't understand the question. I
23 mean, there was like three questions in there. What
24 was your question?

25 Q. There was one question.

1 MS. GATNAREK: Could you read that back,
2 please?

3 (Reporter read from the record as requested.)

4 MR. MEREDITH: Object to the form of the
5 question again, because I think it assumes that
6 there is a policy, and I think he's testified that
7 there is not a policy. It's just at the discretion
8 of the communications director.

9 A. The communications director has always had
10 the discretion over who posts.

11 Q. Ms. Kuhn hasn't always been communications
12 director during the governor's administration; is
13 that correct?

14 A. Correct.

15 Q. Who filled that role prior to Ms. Kuhn?

16 A. Amanda Stamper.

17 Q. And who filled it prior to Amanda Stamper?

18 A. Jessica Ditto.

19 Q. And did anyone fill that role prior to
20 Jessica Ditto?

21 A. Catherine Easley was also involved in
22 communications.

23 Q. How was she involved in communications?

24 A. She was the communications director for a
25 short period of time.

1 Q. Do you know when that period of time was?

2 A. I don't recall, exactly.

3 Q. Do you recall if it was prior to Ms. Ditto?

4 A. I'm trying to remember the timeline of --
5 we've had people come and go, and I can't remember
6 the exact timeline of Catherine and Jessica, when
7 they overlapped.

8 Q. Okay. Besides Ms. Stamper, Ms. Ditto, and
9 Ms. Easley, has anyone else filled the role of
10 communications director in Governor Bevin's
11 administration?

12 A. No. I'm not sure Jessica Ditto was ever
13 communications director. I think she may have been
14 press secretary. That's right.

15 Q. Did your counsel just clarify for you the
16 role?

17 A. Yeah. I forgot, sorry. We've had --

18 Q. That's quite all right.

19 So is it true that Jessica Ditto was
20 communications director, or was -- did she have a
21 different role?

22 A. No, she was communications director. I'm
23 sorry.

24 Q. That's all right. Thank you.

25 Now, that gives us four people who have

1 served as communications director at some point?

2 A. Catherine Easley was never communications
3 director. She was deputy chief of staff for
4 external affairs. I'm going to correct that.

5 Q. Deputy chief of staff for external affairs;
6 is that right?

7 A. I think that was her title. I'm not 100
8 percent positive, but I think that was her title.

9 Q. Did she ever have discretion over what posts
10 are posted to the governor's official social media
11 pages?

12 A. No. I think that was the communications
13 director that always had that position.

14 Q. Okay. So those would be Jessica Ditto,
15 Amanda Stamper, and Elizabeth Kuhn; is that correct?

16 A. That's correct.

17 Q. Is there anybody else that we're missing in
18 that list?

19 A. No. Sorry, just to make sure I understand
20 your question, that have been communications
21 director? Is that your question?

22 Q. Yes. Although, if anybody has filled a role
23 within the governor's office similar to
24 communications director but without that title, I
25 would like to know that too.

1 A. The only three communications directors that
2 the governor has had were Jessica Ditto, Amanda
3 Stamper, and Elizabeth Kuhn.

4 Q. So let me just ask one clarifying question,
5 then.

6 Has anybody else besides those three
7 individuals ever had discretion over what posts are
8 made to the governor's official social media pages?

9 A. No.

10 Q. So when I was asking you before if any
11 changes had been made to the governor's office
12 practice over what posts are made to his official
13 social media accounts, I think we got a little bit
14 confused talking about that question.

15 I'm curious if there has ever been a change
16 in practice -- so this doesn't have to be a
17 written-down policy.

18 Has there ever been a change in practice
19 within the governor's office as to who has ultimate
20 discretion over what posts are made to the official
21 social media accounts?

22 MR. MEREDITH: Objection to the form.

23 A. Not to my knowledge.

24 Q. Who would know?

25 A. Again, you're asking about -- there's not a

1 written policy. The practice is the communications
2 director is responsible for the content on the
3 official Facebook and Twitter accounts, and that's
4 always been the case.

5 Q. When you say "always been the case," do you
6 mean since day one of the administration?

7 A. Yes.

8 Q. Is there a written job description for
9 communications director?

10 A. No.

11 Q. We've talked about individuals who have
12 access to post content on the governor's official
13 social media pages.

14 What is the governor's office policy or
15 practice regarding who has access to monitor the
16 governor's official social media pages?

17 A. Discretion of the communications director.

18 Q. So it is up to the communications director at
19 the time to decide which governor's employees will
20 have access to monitor the official social media
21 accounts?

22 A. Yes.

23 Q. Do you know what kinds of considerations go
24 into making that decision?

25 A. No.

1 Q. Who would know?

2 A. She would.

3 Q. When you say "she," who do you mean?

4 A. The communications director.

5 Q. Which is currently Elizabeth Kuhn?

6 A. Yes.

7 Q. Did you ask Ms. Kuhn, in preparation for
8 today's deposition, the policy or practice by which
9 someone would get access to monitor?

10 A. No.

11 Q. Do you know -- I'm sorry. Strike that.

12 When an employee of the governor's office is
13 given access to monitor the official social media
14 pages, what training do they receive in how to do
15 that?

16 A. I don't know.

17 Q. Who would know?

18 A. The communications director.

19 Q. Did you ask her about training in preparation
20 for today's deposition?

21 A. No.

22 Q. Okay. Do you know if there have been any
23 changes to the governor's office policy or practice
24 regarding who has access to monitor the official
25 social media accounts?

1 MR. MEREDITH: Objection to the form of the
2 question because it assumes that there is a policy
3 beyond the communications director's discretion.

4 A. It's the discretion of the communications
5 director.

6 Q. And it has always been the discretion of the
7 communications director?

8 A. What has?

9 Q. Making the decisions about who has access to
10 monitor the official social media accounts.

11 A. Yes.

12 Q. Do you know if there is any -- the
13 communications director has changed over time, we've
14 established that, correct?

15 A. The person in the role of the communications
16 director?

17 Q. Yes.

18 A. Has changed.

19 Q. Do you know if there's any guidance as to the
20 policy or practice that we're referring to here
21 regarding who has access to monitor the official
22 social media pages, do you know if there's any
23 guidance given to the communications directors as
24 those individuals change roles?

25 A. I don't understand your question.

1 Q. So when one communications director leaves
2 and another comes in, is there any guidance given to
3 the incoming communications director regarding
4 making a decision about who has access to monitor
5 the governor's social media accounts?

6 A. The only guidance is it's up to the
7 discretion of the communications director to make
8 that decision.

9 Q. Is there any written policy about that?

10 A. No.

11 Q. Are there any emails exchanged regarding
12 that?

13 A. I don't know.

14 Q. Did you look for any emails regarding that --

15 A. Regarding what?

16 Q. -- in preparation for today's deposition?

17 Regarding the discretion of the
18 communications director to decide who has access to
19 monitor the official social media pages?

20 A. What is your question?

21 Q. Did you look for any emails regarding the
22 discretion that the communications director has to
23 determine who has access to monitor the governor's
24 social media pages?

25 A. Did I?

1 Q. Uh-huh.

2 A. No.

3 Q. Do you know if anybody did?

4 A. I don't know.

5 Q. Did you ask anybody to?

6 A. No.

7 Q. What is the governor's office policy about
8 when a user is blocked from the defendant's official
9 social media accounts?

10 A. Which account?

11 Q. Let's talk about Facebook first. Facebook.

12 A. What is your question?

13 Q. What is the governor's office policy about
14 when a user is blocked from the defendant's official
15 Facebook account?

16 A. A person may be blocked from the official
17 Facebook account if they post obscene content,
18 abusive content, or they are repeatedly off topic.

19 Q. Is that the official policy of the governor's
20 office?

21 A. Yes.

22 Q. How was that policy created?

23 A. I don't know. How was it created?

24 Q. Who was the first person to come up with the
25 idea that individuals who post obscene content

1 should be blocked from the defendant's official
2 Facebook page?

3 A. I don't know.

4 Q. Who would know?

5 A. I don't know.

6 Q. Would the governor know?

7 A. Would he know what?

8 Q. Who developed the policy that we're referring
9 to here.

10 A. I don't know. I don't think so.

11 Q. Would Ms. Ditto know?

12 A. I don't know.

13 Q. You can't think of anyone else in the
14 governor's office who would know the answer to that
15 question?

16 A. The answer to what question?

17 Q. Who developed that policy.

18 A. Who developed the policy? We stated what the
19 policy was very clearly in July of 2017.

20 Q. And the governor had been governor for over a
21 year and a half prior to that; is that correct?

22 A. Prior to when?

23 Q. July of 2017.

24 A. He's been governor since December of 2015.

25 Q. Yes. So was that policy created prior to

1 July 2017?

2 A. That's always been the way the governor's
3 office has treated this issue. If you post abuse --
4 I mean, obscene, abusive, or repeatedly off-topic
5 comments, you will be blocked.

6 Q. The governor's official social media pages
7 are managed by human beings, though, correct?

8 They don't manage themselves?

9 A. Is that a question?

10 Q. Yes. They don't manage themselves, do they?

11 A. Are you asking me if a page manages itself?

12 Q. Yes.

13 A. I don't even know what that means.

14 Q. So do you agree that humans monitor -- I'm
15 sorry.

16 Do you agree that humans manage the
17 governor's official social media pages?

18 A. If you're asking me if human beings manage
19 the accounts, yes. There are human beings that are
20 involved in these Facebook pages and Twitter pages.

21 Q. And that has been the case since they were
22 created; is that right?

23 A. Yes.

24 Q. Okay. So which of those humans was the first
25 to decide that individuals who post obscene,

1 abusive, or repeated off-topic comments should be
2 blocked from the defendant's official Facebook page?

3 A. I don't know who the first person to do it
4 was. I mean, the communications director has always
5 done this. That's the way the governor's office has
6 always operated.

7 If you post obscene, abusive, or repeatedly
8 off-topic comments, you will be blocked.

9 Q. But you don't know who developed that policy?

10 MR. MEREDITH: Objection, asked and answered.

11 A. That's always been the policy.

12 Q. Since day one of the administration?

13 A. Yeah.

14 Q. And you don't know -- so you've said that you
15 don't know who created that policy.

16 Do you know who would know?

17 A. No.

18 Q. Do you know who would know who would know the
19 answer to that question?

20 A. Is that a question?

21 Q. Yes.

22 A. Do I know who would know?

23 It's always been the policy, since day one of
24 the administration.

25 Q. But it was a policy developed by a person,

1 some person, correct?

2 And I want to know who that person is.

3 A. I mean, you're asking -- you're asking about
4 something that happened three years ago.

5 Q. Uh-huh.

6 A. And what is your question?

7 I mean, that's always been the policy.

8 Q. I understand it's always been the policy.

9 I wonder who the person was that created it.

10 A. I don't know.

11 Q. And I'm asking if you can tell me any
12 information about who would know --

13 MR. MEREDITH: Objection.

14 Q. -- or who would know who would know.

15 MR. MEREDITH: Objection, asked and answered.

16 A. I don't know.

17 Q. Okay. How does the governor's office define
18 what is an obscene comment -- oh, I'm sorry. Strike
19 that, and let me ask another question.

20 You identified what would get a user blocked
21 from the defendant's official Facebook account, and
22 that is if someone posts an obscene, abusive, or
23 repeated off-topic comment; is that correct?

24 A. Yes.

25 Q. What is the governor's official policy about

1 what gets a user blocked from the governor's
2 official Twitter account?

3 A. It's the same policy.

4 Q. So when we talk about this policy and when we
5 talk about definitions of the words, is it going to
6 be the same definition of the word obscene for both
7 Facebook and Twitter?

8 A. Yes.

9 Q. Will it be the same definition of abusive for
10 both Facebook and Twitter?

11 A. Yes.

12 Q. And will it be the same definition of
13 repeated off-topic comments for both Facebook and
14 Twitter?

15 A. Yes.

16 Q. So as we discuss those three -- obscene,
17 abusive, and repeated off topic -- I won't
18 necessarily refer to Facebook or Twitter, unless you
19 think it's necessary for some question.

20 Is that -- can we agree on that?

21 A. Yep.

22 Q. I think that will save some time.

23 But let me ask if you know who created that
24 policy, that obscene, abusive, or repeated off-topic
25 comments will get you blocked from the defendant's

1 Twitter account.

2 Do you know who created that policy?

3 A. That's always been the policy, since day one.

4 Q. And do you know who the person was on day one
5 who developed that policy for Governor Bevin's
6 Twitter?

7 A. Jessica Ditto was the communications director
8 on day one.

9 Q. Do you know if she developed that policy?

10 A. I don't. It's always been the policy, since
11 day one. That's all I know.

12 Q. And Ms. Ditto was not one of the individuals
13 you spoke to in preparation for today's deposition;
14 is that correct?

15 A. I have not talked to Ms. Ditto about this.

16 Q. Okay. Let's go back to the question I
17 previously asked, which was: What is the governor's
18 office definition of the word obscene as it relates
19 to a comment that will get you blocked from his
20 social media accounts?

21 A. You're asking me to define obscenity?

22 Q. Yes.

23 A. I don't know how to define obscenity. You
24 know it when you see it.

25 Q. What are the governor's employees told to

1 look for when they are looking to see if a comment
2 is obscene on the governor's official social media
3 accounts?

4 A. I don't know.

5 Q. Who would know?

6 A. Communications director, she may know.

7 Q. So does the governor's office have an
8 official policy about what kinds of comments are
9 obscene?

10 A. A written policy?

11 Q. Or unwritten. Let's start with written.

12 Does the governor's office --

13 A. No.

14 Q. -- have a written policy as to what kinds of
15 comments are obscene?

16 A. No.

17 Q. Does the governor's office have an unwritten
18 policy as to what kinds of comments are obscene?

19 MR. MEREDITH: Object to the form of the
20 question.

21 A. You're asking -- obscene is what it is. It's
22 obscene. That's the policy.

23 Q. And how are employees in the governor's
24 office who are monitoring the social media accounts
25 trained in what to look for?

1 A. I don't know.

2 Q. Who would know?

3 A. Communications director.

4 Q. Did you ask her, in preparation for today's
5 deposition, about that?

6 A. Did I ask her what?

7 Q. What kinds of comments are considered
8 obscene.

9 A. No.

10 Q. Who decides -- who within the governor's
11 office decides whether a comment is obscene?

12 A. I don't know.

13 Q. Who would know?

14 A. The communications director.

15 Q. Did you ask her about that in preparation for
16 today's deposition?

17 A. Did I ask her about what?

18 Q. Who decides whether a comment is obscene.

19 A. No. But this -- we've already been over who
20 can -- I mean, who has access to these accounts.

21 Q. Okay. How is that related to this question,
22 who decides whether a comment is obscene?

23 A. You would have to ask the communications
24 director.

25 Q. So does the governor's office have an

1 official policy about who decides whether a comment
2 is obscene?

3 A. I think you've asked me that like three
4 times. No.

5 Q. I previously asked you if the governor's
6 office had an official policy about the definition
7 of obscene, but this is specifically with regard to
8 who within the governor office decides whether a
9 comment is obscene.

10 So given that framework, does the governor's
11 office have an official policy about who decides
12 whether a comment is obscene?

13 MR. MEREDITH: Objection, form of the
14 question.

15 A. I didn't even understand the question.

16 MS. GATNAREK: Could you read that back,
17 please?

18 (Reporter read from the record as requested.)

19 MR. MEREDITH: Objection to the form of the
20 question. I mean, I think that he's testified that
21 the communications director gives people access to
22 and enables them to enforce the policy of blocking
23 obscene comments, but I'm not -- I think he's
24 already answered that question, but I'm not sure
25 what you're asking --

1 MS. GATNAREK: I don't know that we do have
2 an answer to it.

3 Q. I mean, who decides whether a comment on the
4 governor's official social media accounts is
5 obscene?

6 A. I don't.

7 Q. Who does?

8 MR. MEREDITH: Are you asking who does the
9 blocking or -- I'm not sure --

10 MS. GATNAREK: Well, I mean, that's next.
11 That's next.

12 Q. Before a person is blocked for having written
13 an obscene comment, there first has to be an obscene
14 comment, I think.

15 And my question is: Who decides whether that
16 comment is obscene?

17 A. I don't know.

18 Q. And I think I previously asked you who would
19 know, and you said Elizabeth Kuhn; is that correct?

20 A. I said the communications director.

21 Q. You said the communications director. Yeah.

22 A. Who is currently Elizabeth Kuhn.

23 Q. That's correct. I'm sorry.

24 And that's not a question that you asked her
25 in preparation for today's deposition; is that

1 correct?

2 A. Again, when you start asking all these
3 questions at the same time, I can't follow which
4 ones you're talking about.

5 Q. Okay. So I certainly don't mean to put any
6 words in your mouth.

7 Did you ask Ms. Kuhn, in preparation for
8 today's deposition, who decides whether a comment is
9 obscene?

10 A. No.

11 Q. Is there a review process before an
12 individual is blocked for having made an obscene
13 comment?

14 A. I don't know.

15 MR. MEREDITH: Objection, form of the
16 question. What you mean "review process"? What
17 exactly are you talking about?

18 MS. GATNAREK: Any kind of review or approval
19 process.

20 MR. MEREDITH: Do you mean other than the
21 person who blocked them looking at it?

22 MS. GATNAREK: Well, I'm not sure that we've
23 established that that even happens.

24 Q. But is there a review or approval process
25 about whether a comment is obscene before an

1 individual is blocked?

2 A. I don't know.

3 Q. Who would know?

4 A. The communications director.

5 Q. And did you ask her in preparation for
6 today's deposition?

7 A. Did I ask her what?

8 Q. If there is a review or approval process
9 about whether a comment is obscene?

10 A. No.

11 Q. So is there any kind of policy within the
12 governor's office regarding a review or approval
13 process about whether a comment is obscene?

14 A. A written policy?

15 Q. Let's start with written.

16 Is there a written policy?

17 A. No.

18 Q. Is there an unwritten policy?

19 MR. MEREDITH: Object to the form of the
20 question.

21 A. I don't know.

22 Q. You don't know if the governor's office has
23 an official policy about whether there's a review or
24 approval process about whether a comment is obscene?

25 A. You would have to ask the communications

1 director. I don't know.

2 MR. MEREDITH: Object to the form of the
3 question. I don't understand what you mean by
4 "review or approval process."

5 Q. I understand that you don't know and that I
6 would have to ask the communications director, but
7 you are here as a corporate designee on behalf of
8 the governor's office.

9 So I'm asking if there is a governor's office
10 policy about this, and you're saying you don't know;
11 is that correct?

12 A. Is that a question?

13 Q. Yes.

14 A. What is your question?

15 Q. You are here as the corporate designee for
16 the governor's office, correct?

17 A. Yes.

18 Q. In that role, I am asking you if there is an
19 official policy or practice within the governor's
20 office regarding a review or approval process about
21 whether a comment is obscene.

22 MR. MEREDITH: Again, object to the form of
23 the question. I don't think -- I don't think
24 anybody understands what you mean by "review or
25 approval process."

1 Q. How is an individual blocked from the
2 governor's official Facebook page?

3 MR. MEREDITH: Objection to the form of the
4 question. Are you talking about how -- like,
5 literally how are they blocked?

6 MS. GATNAREK: Yes, literally.

7 MR. MEREDITH: Like what button do you press
8 on the screen?

9 Q. Literally, yeah, how is someone blocked?

10 A. I don't know.

11 Q. Do you know who would know?

12 A. Communications director.

13 Q. Does the communications director have to
14 approve every time that someone within the
15 governor's office wants to block an individual?

16 A. I don't know.

17 Q. Who would know?

18 A. The communications director.

19 Q. Did you ask her about that before today's
20 deposition?

21 A. Did I ask her about what?

22 Q. Whether she -- or I'm sorry.

23 Whether the communications director has to
24 approve any time an employee in the governor's
25 office wants to block an individual.

1 A. Did I ask her that?

2 Q. Uh-huh.

3 A. No.

4 Q. Are there ever disagreements within the
5 governor's office about whether a comment is
6 obscene?

7 A. I don't know.

8 Q. If there were ever a disagreement within the
9 governor's office about whether a comment was
10 obscene, how would it be resolved -- or I'm sorry,
11 how would it be addressed?

12 A. The communications director is in charge of
13 communications. You would have to ask her.

14 Q. How does the governor's office let Facebook
15 users know what kinds of comments would be obscene
16 on the governor's Facebook page?

17 MR. MEREDITH: Object to the form of the
18 question.

19 A. What was the question?

20 MS. GATNAREK: Could you read that back,
21 please?

22 (Reporter read from the record as requested.)

23 A. I don't know.

24 Q. Who would know?

25 A. Communications director.

1 Q. Is she the only person?

2 A. I don't know.

3 Q. So does the governor's office have a policy
4 or practice by which they let people know on
5 Facebook what kinds of comments would be obscene?

6 A. I don't know.

7 Q. And you are here on behalf of the governor's
8 office, representing the governor's office?

9 A. How many times did you ask me that question?

10 Q. I just want to confirm that you're answering
11 for the governor's office when you say that you
12 don't know whether the governor's office has a
13 policy --

14 A. The communications director would know the
15 answer to that question.

16 Q. Okay. And is a user blocked from Facebook or
17 Twitter after one obscene comment?

18 A. They could be.

19 Q. What would determine that?

20 A. Whether the comment was obscene.

21 Q. You said that they could be blocked after one
22 comment.

23 So I'm wondering: Are there situations where
24 one obscene comment won't get you blocked?

25 A. One obscene comment can get you blocked.

1 Q. Does it always?

2 A. I don't know.

3 Q. Who would know?

4 A. What is your question?

5 Q. Who would know whether one obscene comment
6 always gets a user blocked?

7 MR. MEREDITH: Objection to the form the
8 question. Are you asking if there are circumstances
9 where a person makes two or three obscene comments
10 before they get blocked, or what --

11 MS. GATNAREK: I asked if one obscene comment
12 always gets you blocked, and I think the answer was
13 it can.

14 MR. MEREDITH: Object to the use of the word
15 "always" because -- well, I think he's answered.

16 Q. Are there situations where a user would not
17 be blocked after one obscene comment?

18 A. No. But you asked me if they always get
19 blocked. That means that someone may have made an
20 obscene comment that no one saw, and maybe they
21 didn't get blocked.

22 Q. Okay. But does --

23 A. One obscene can get you blocked.

24 MS. GATNAREK: Okay. Could we take a break?

25 MR. MEREDITH: Yeah.

1 (A Discussion Was Held Off the Record.)

2 Q. What is the governor's office's definition of
3 abusive in the context of this policy we've been
4 discussing?

5 A. Abusive?

6 Q. Uh-huh.

7 A. People that make threats, physical threats.
8 People that make comments about someone's race or
9 ethnicity or sexual orientation or anything that's
10 like that.

11 Q. Anything else?

12 A. That's pretty broad. I mean, it's abusive.

13 Q. Is that a written policy?

14 A. No.

15 MR. MEREDITH: Object to the form of the
16 question. Go ahead.

17 Do you mean written other than the written
18 statement that's -- that you've already been
19 provided in interrogatories?

20 MS. GATNAREK: Well, sure.

21 Q. Mr. Brickman, I will hand you what's
22 previously been marked as Deposition Exhibit 5.

23 Have you seen this document before?

24 A. Yep.

25 Q. Is this one of the documents you reviewed in

1 preparation for today's deposition?

2 A. Yes.

3 Q. I'll ask that you turn to page 5 of that
4 document, and interrogatory number 5.

5 Do you see that at the bottom there, near the
6 bottom?

7 A. Yeah.

8 Q. In this interrogatory, I'll represent to you
9 we asked for "Any policy, written or otherwise,
10 promulgated by or followed by your office governing
11 individual users' activity on Governor Bevin's
12 official Facebook page and how that policy was
13 relayed to Facebook users."

14 And you'll see in the response there, "In
15 July of 2017, the governor's office issued the
16 following official statement."

17 Do you see that?

18 A. Yeah.

19 Q. Okay. I believe earlier this morning you
20 testified about the governor's office having made a
21 statement -- a public statement about the policy for
22 comments on his official Facebook and Twitter pages.

23 Is this that statement that you were referring
24 to?

25 A. Yes.

1 Q. Okay. And just to clarify, if you flip to
2 page 6, interrogatory number 6, you'll see there
3 we've asked for the same policy as it regards to
4 Twitter. The response was "See response to
5 Interrogatory number 5 above."

6 So is this July 2017 policy the same policy
7 for Twitter?

8 A. Yes.

9 Q. Okay. In that policy, at the top of page 6,
10 on line 2, second line down, you'll see, "Posting
11 obscene and abusive language or images."

12 Do you see that?

13 A. I do.

14 Q. That policy doesn't include a definition for
15 what abusive is, correct?

16 MR. MEREDITH: Objection to the form.

17 A. Does it define abusive?

18 Q. Right.

19 A. No.

20 Q. Okay. So when I asked you just a moment --

21 A. Doesn't define obscene, either.

22 Q. Right. Exactly. We've been over what the
23 governor's office's definition of obscene is, I
24 believe. And I am now asking you about the
25 governor's office's definition of the word abusive.

1 And you said -- and I'm paraphrasing here, I
2 think, so correct me if any of this is incorrect.

3 You said threats, physical threats, comments
4 about race, sexual orientation, and things like
5 that.

6 A. Ethnicity.

7 Q. Ethnicity.

8 A. Gender. I mean, anything that could be
9 viewed as abusive.

10 Q. Okay. Is that policy -- I'm sorry.

11 Is that definition of abusive written down
12 anywhere?

13 A. No -- well, anywhere? On here, no, it's not
14 written down.

15 Q. So it's not in this July 2017 statement,
16 correct?

17 A. Correct.

18 Q. Within the governor's office, is that a
19 written policy?

20 A. No.

21 Q. How are governor's office employees trained
22 in knowing what the definition of abusive is as it
23 relates to comments on social media pages?

24 A. You would have to ask the communications
25 director that. I do think most people have a pretty

1 good understanding of what obscene or abusive is.

2 Obscene is foul language, pornography. I
3 mean, people know what obscene is, just like they
4 know what abusive is.

5 Q. And so how do people within the governor's
6 office know what they are, though? Strike that.

7 How do people within the governor's office
8 know what kinds of comments are deemed abusive?

9 A. I think abusive is an objective term. People
10 know what an abusive statement is. It's objective.

11 Q. Does the governor's office have any kind of
12 written or unwritten policy about that?

13 A. There's no written policy.

14 Q. So how, then, are employees trained in what
15 kinds of comments are abusive?

16 A. You would have to ask the communications
17 director about any training.

18 But again, obscenity and abusive are objective
19 terms that people generally understand what they
20 are.

21 Q. How do you know that those are objective
22 terms?

23 A. I'm telling you they're objective terms.
24 That's how I know they are.

25 Q. And how do you know that all the -- how do

1 you know if all of the employees in the governor's
2 office have the same understanding of what kinds of
3 comments are abusive?

4 A. Because it's an objective term. Both of them
5 are. Obscene and abusive are objective terms.

6 Q. Is there ever any disagreement within the
7 governor's office about whether a comment is
8 abusive?

9 A. There could be.

10 Q. What happens then?

11 A. My understanding is if there's a disagreement
12 about whether a term is abuse -- obscene or abusive,
13 that the communications director would resolve that
14 dispute.

15 But again, my understanding is, for the vast
16 majority of these, it's objectively known what
17 comments are obscene or abusive.

18 Q. But if there are ever any disagreements about
19 whether a comment is abusive, doesn't that, by
20 definition, mean it's not necessarily objective?

21 A. Not necessarily.

22 Q. Are you aware of any specific instances where
23 employees within the governor's office have
24 disagreed about whether a comment is abusive?

25 A. No.

1 Q. And how do visitors to the governor's
2 official social media pages know what kinds of
3 comments would be considered abusive?

4 MR. MEREDITH: Object to the form of the
5 question. Object to the extent you're asking him to
6 speculate about what other people know or don't
7 know.

8 Q. You can answer.

9 A. What's your question?

10 Q. How do visitors to the governor's official
11 social media pages know what kinds of comments would
12 be considered abusive?

13 MR. MEREDITH: Same objections.

14 A. I don't know. You're asking me how someone
15 else would know something. I don't know.

16 Q. Does the governor's office tell people what
17 kinds of comments would be considered abusive on his
18 official social media pages?

19 A. My understanding is if someone has been
20 blocked, they can contact the governor's office to
21 understand our policy. And if they do something
22 that's obscene or abusive and they agree to abide by
23 our policy, they can be unblocked. That would be
24 the only way that people could know, is by
25 contacting our office.

1 Q. And that would happen after they've already
2 been blocked, correct?

3 A. What would happen?

4 Q. You were talking about someone contacting the
5 governor's office asking to be unblocked.

6 So that communication would only happen after
7 somebody has been blocked; is that correct?

8 A. I don't understand your question.

9 Q. When I was asking you about how visitors to
10 the governor's official social media pages know what
11 kinds of comments would be considered abusive, your
12 response to me was, well, if someone's been blocked,
13 they can contact us to be unblocked and agree to
14 abide by our rules; is that fair?

15 A. What do you mean by "fair"?

16 Q. Did I just summarize that exchange fairly?

17 A. What's your question?

18 Q. Well, my question to you is -- you mentioned
19 a practice by which someone could contact the
20 governor's office and ask to be unblocked.

21 My question to you is: That only happens
22 after somebody has been blocked, correct?

23 A. Someone would only contact the governor's
24 office to be unblocked if they have been blocked.
25 If that's your question, the answer is yes.

1 Q. Yes. Exactly. Thank you.

2 So how does somebody -- unless or until
3 somebody is blocked for having made an abusive
4 comment, how is someone supposed to know what kinds
5 of comments are considered abusive on the governor's
6 official social media pages?

7 A. Well, since day one, the policy has always
8 been you can be blocked for obscene, abusive, or
9 repeatedly off-topic remarks. We've publicly put
10 that out. So I can't tell you what someone may or
11 may not know out on the Internet.

12 Q. You publicly put that out in July of 2017,
13 right?

14 A. Yes.

15 Q. So did someone know -- how would someone have
16 known before July of 2017 what that policy was?

17 A. I don't know.

18 Q. And is a user blocked after -- strike that.

19 Would one obscene -- could one obscene
20 comment, just one, get a user blocked?

21 A. Yes.

22 Q. What is the governor's office's definition of
23 what constitutes spam on his official social media
24 accounts?

25 A. Spam is the same thing as repeatedly

1 off-topic comments.

2 Q. What is the governor's office's definition of
3 repeated off-topic comments?

4 A. More than one comment -- are you talking
5 about Facebook or Twitter?

6 Q. Well, we can talk about them separately. But
7 before we do that, let me just clarify that earlier
8 I asked you if the policy was the same on both, and
9 you said that it was.

10 So is there a difference in how repeated
11 off-topic comments -- is there a different
12 definition for repeated off-topic comments on
13 Facebook than there is for Twitter?

14 A. No.

15 Q. So if I ask you the question: What is the
16 governor's office's official definition of repeated
17 off topic, the answer is going to be the same for
18 Facebook and Twitter?

19 A. Yes.

20 Q. Okay. So what is the governor's office --

21 A. They're just platforms. They have
22 different -- they operate differently.

23 Q. That's true. So what is the governor's
24 office's official definition of repeated off-topic
25 comments?

1 A. More than one comment that has nothing to do
2 with the original Facebook post for Facebook or
3 tweet for Twitter.

4 Generally, it's two or three or more comments
5 that are totally unrelated to the original Facebook
6 post or tweet.

7 Q. When you referred to generally two or three
8 or more comments, do you mean within one Facebook or
9 Twitter post?

10 A. Not necessarily.

11 Q. Who decides what comments are off topic on a
12 particular post?

13 A. The person with access --

14 Q. When you say --

15 A. -- to block.

16 Q. I'm sorry.

17 A. The person with access to block.

18 Q. And we know who those are because they've
19 been identified on Exhibit 29; is that correct?

20 A. Yes.

21 Q. Do you know if each individual identified on
22 this list as having access to block people on the
23 governor's social media accounts has the discretion
24 to determine if a comment is off topic his- or
25 herself?

1 MR. MEREDITH: Objection. Do you mean sole
2 discretion, or what --

3 Q. Yes. Discretion.

4 A. Yeah. These people can block people.

5 Q. And each of these individuals identified can
6 decide themselves whether someone gets blocked for
7 repeated off-topic comments; is that correct?

8 A. Yes. But it's ultimately they all report to
9 the communications director who's responsible for
10 this.

11 Q. Before one of these identified individuals
12 blocks somebody for repeated off-topic comments, do
13 they need to get approval from anybody else?

14 A. My understanding is they do not.

15 One point of clarification: When I was
16 looking on this sheet, the people on this sheet
17 where the key would be would be people that have
18 actually done those three things, not that have the
19 access to do those three things, if that makes
20 sense.

21 Q. It does.

22 A. So for example -- this is one example on John
23 Hodgson, if he has a 3 next to his name, that would
24 mean that he's never done 1 or 2. He's only done 3.

25 Q. I see. Thank you for that.

1 A. If that makes sense. I didn't clarify that
2 earlier.

3 Q. No. Thank you. That's helpful.

4 So using Mr. Hodgson as an example, he has a 3
5 next to him, so we know that he has deleted or
6 hidden, hid, off-topic or inappropriate Facebook
7 comments and he has -- and are you saying that he
8 has not posted content or blocked or banned based on
9 the policy?

10 A. I am.

11 Q. But that he has access to if he were told to
12 do so?

13 A. Again, my understanding on how this works is
14 you have access to do all three things if you're
15 given access, but that doesn't actually mean you've
16 done all three things.

17 You've only -- the way this sheet is broken
18 down is with the numbers next to these people's
19 names, they've only actually done either 1, 2, or 3
20 as laid out on this sheet.

21 Q. Okay. That's helpful. Thank you.

22 A. You can see that I've done none.

23 Q. I do see that.

24 Do you have access to do any of them?

25 A. No.

1 Q. Given that clarification, does that change
2 any of your answers here this morning?

3 A. I don't think so.

4 Q. And I know we've talked about a lot, so --

5 A. I mean, I don't think it does. I just wanted
6 to clarify that.

7 Q. Thank you. Are there any communications
8 within the governor's office about specific
9 instances where there was a question regarding
10 whether something was off topic?

11 A. Define communication.

12 Q. Written communication on mediums such as
13 email, text message, Facebook Messenger, Twitter
14 Direct Message.

15 A. So what is your question?

16 Q. Are there any written communications among
17 employees in the governor's office about specific
18 instances where there was a question about whether a
19 comment was off topic?

20 A. I'm not aware of any.

21 Q. Do you know -- or have -- I'm sorry.
22 Have you searched for them?

23 A. Have I personally?

24 Q. Uh-huh.

25 A. No.

1 Q. Do you know if a search was undertaken for
2 them?

3 A. I don't know.

4 MR. MEREDITH: I'll object to the extent that
5 I don't think that's anywhere on the topics -- list
6 of topics here.

7 Q. Does the governor's office have a policy
8 about whether there are specific words that are
9 always off topic?

10 A. My understanding is that on Facebook, for
11 example, there can be filters that you put in that
12 automatically hide certain comments based on certain
13 words; for example, curse words.

14 If someone types a curse word in, Facebook has
15 some type of ability to hide that comment.

16 Q. Uh-huh.

17 A. Does that answer your question?

18 Q. Well, it leads me to another question.

19 But let me just clarify that if the Facebook
20 filter filters out curse words, that would be --
21 those would be obscene words; is that correct?

22 So today we've been talking about abusive,
23 obscene, and repeated off-topic comments, is that
24 correct, and curse words would fall under obscene;
25 is that right?

1 A. Curse words would be obscene. They could
2 also be abusive, depending on the context.

3 Q. Sure. That's true. But I'm wondering if
4 those curse words are considered off topic.

5 MR. MEREDITH: Object to the form of the
6 question. Do you mean categorically or --

7 Q. I mean within the governor's office as we're
8 discussing this policy, are curse -- there's
9 specific curse words that are considered off topic?

10 MR. MEREDITH: Objection. Do you mean
11 categorically or based on the context?

12 MS. GATNAREK: I'm going to let the witness
13 answer the question however he understands it.

14 A. There could be a comment that is obscene,
15 abusive, and repeatedly off topic all in the same
16 comment. It happens all the time, if you follow
17 social media.

18 Q. Okay.

19 A. They're not mutually exclusive, necessarily.

20 Q. Sure. I definitely understand that that
21 could be the case.

22 A. It happens all the time.

23 Q. Are there, though, words that the governor's
24 office has identified as being always off topic,
25 specific words?

1 A. I can't answer that question. Depends on --
2 there's so many variables that go into what is an
3 off-topic comment that there's not one topic that
4 would always be considered off topic, necessarily,
5 if that's what you're asking me. I mean, depends on
6 the context of the original post, what's on topic
7 and what's off topic.

8 Q. So do you know if the governor's office
9 employs that Facebook keyword filter to filter out
10 off-topic comments?

11 MR. MEREDITH: Object to the form of the
12 question, and asked and answered as well.

13 But go ahead and answer to the extent --

14 A. What's your question?

15 MS. GATNAREK: Could you read that back?

16 (Reporter read from the record as requested.)

17 A. I don't know. Again, off topic is not
18 defined by words. It's defined by what the topic
19 is.

20 Q. Do you know if the governor's office uses the
21 Facebook keyword filter on the governor's official
22 Facebook page?

23 A. My understanding is we do.

24 Q. And are you aware of what words are included
25 in that filter?

1 A. No.

2 Q. Is that something that you reviewed in
3 preparation for today's deposition?

4 A. Did I review what?

5 Q. The key words that are used that the
6 governor's office filters out on Facebook?

7 A. I did not review those.

8 Q. And just to be clear, do you know if there is
9 an analogous tool available on Twitter?

10 A. I don't know.

11 Q. Do you know if the Facebook keyword -- strike
12 that.

13 Do you know if the governor's office employs
14 the Facebook keyword filter to filter out anything
15 besides curse words or foul language?

16 A. I don't know what words are in the governor's
17 Facebook filter; therefore, I can't answer your
18 question.

19 Q. Do you know who would know?

20 A. Communications director.

21 Q. Okay. A little while ago, when we started
22 this conversation about off-topic comments, you
23 referred to these as repeated off-topic comments,
24 and we started to get into a discussion about the
25 number of comments that are needed in order to be

1 considered repeated. And I want to, just to make
2 sure that I understand -- that I understand you on
3 this.

4 Does the governor's office look for off-topic
5 comments that are repeated within the comments or
6 replies to a singular post?

7 MR. MEREDITH: Objection, asked and answered.

8 A. I don't understand your question.

9 Q. So the governor's office, both on Facebook
10 and Twitter, makes posts on behalf of Governor
11 Bevin. We've been talking about posting
12 content, and I will refer to these as posts.

13 Do you understand what I mean by that?

14 A. Yes.

15 Q. Okay. Within -- or on a post on both
16 Facebook and Twitter, there's a mechanism by which
17 other users can post their own comments.

18 Are you with me so far?

19 A. (Witness nodded head.)

20 Q. And on Twitter, these are called comments --
21 I mean on Facebook, these are called comments; on
22 Twitter these are called replies. For this
23 conversation, I will refer to them all as comments.

24 Is that -- can you agree to that, or do you
25 want me to --

1 A. Yes.

2 Q. Okay.

3 A. In the interest of time, yes.

4 Q. Okay. Great.

5 So within a singular post on either the
6 Facebook or Twitter page, there are comments from
7 users who are not the governor; is that correct?

8 A. There can be.

9 Q. I mean, I suppose technically the governor
10 could also post a comment or reply. But again, in
11 the interest of time, let's talk about those
12 comments that are posted by users who aren't
13 Governor Bevin.

14 And my question to you is: Does the
15 governor's office, in looking for repeated off-topic
16 comments, look for comments that are repeated within
17 the body of a singular post -- or within the
18 comments of a singular post? I'm sorry.

19 MR. MEREDITH: Objection. Do you mean only
20 look for it within that or --

21 MS. GATNAREK: No. I don't mean only.

22 MR. MEREDITH: Okay.

23 Q. I mean does the governor's office look for
24 comments that are repeated within the comments
25 section of a singular post?

1 A. Yes, but that's not exclusive.

2 Q. I understand. Let's just stick with this for
3 a second, though. Okay?

4 Within that singular post and within the
5 comments section of that singular post, how many
6 times must a comment be repeated before it is deemed
7 to be in violation of the policy against repeated
8 off-topic comments?

9 A. Well, the definition of repeat assumes
10 there's at least two, right?

11 So my understanding is it's generally two or
12 three or more. It has to be at least two to repeat.

13 Q. At least two to repeat. Yep.

14 A. So to have a repeated off-topic comment,
15 that's more than one.

16 Q. Right. So two or more of the same comment
17 posted in a singular post will get -- could get
18 somebody blocked?

19 A. It could.

20 Q. Okay. Now, when I introduced this singular
21 post, you said that's not the only thing the
22 governor's office looks for.

23 What else do they look for?

24 A. On what?

25 Q. With regard to monitoring for repeated

1 off-topic comments.

2 A. The whole universe of that person's comments.

3 Q. What do you mean by that?

4 A. We don't just look at one post. A lot of
5 people put repeated off-topic comments on many
6 different posts. They try to hijack the social
7 media page.

8 Q. How does the governor's office keep track of
9 a specific user's comments across multiple posts?

10 A. I don't know.

11 Q. Does it matter whether or not that user's
12 comments across multiple posts are exactly the same?

13 A. What do you mean by "the same"?

14 Q. We've heard testimony from other witnesses
15 about comments being cut and pasted, so exactly the
16 same words in exactly the same order.

17 When the governor's office is monitoring for
18 repeated off-topic comments across multiple posts,
19 does it matter whether those repeated off-topic
20 comments are exactly the same?

21 A. No.

22 Q. Okay. So what does the governor's office
23 look for across multiple posts in determining
24 whether somebody has repeated -- has posted repeated
25 off-topic comments?

1 A. Whether the topics are on comment or not --
2 on topic or not.

3 Q. So the posts -- so if a person -- if a user,
4 not Governor Bevin, posts a comment on one of
5 Governor Bevin's posts that the governor's office
6 believes is off topic and then that same user goes
7 to another of Governor Bevin's posts and posts a
8 completely different comment but one that the
9 governor's office also believes is off topic, do
10 those two comments -- could those two comments get
11 that person blocked?

12 A. They could. Again, they're off topic and
13 it's repeated. That means there's more than one.

14 Q. You mentioned that part of the understanding
15 of what "repeated off-topic comments" means is that
16 users are trying to hijack the governor's post.

17 What did you mean by the word "hijack"?

18 A. Hijack means something that's totally off
19 topic, trying to change the subject away from the
20 intent of the original post to try to, again, take
21 over the conversation about something that was not
22 the intent of the original post.

23 Q. And how do you know if a user who's not
24 Governor Bevin who's posting these comments is
25 trying to do that?

1 A. They're off topic.

2 Q. How do those -- how do users on Governor
3 Bevin's social media pages know what the topic of a
4 post is?

5 A. I assume they can read.

6 Q. Is the topic of Governor Bevin's posts always
7 clear?

8 MR. MEREDITH: Objection. Clear to whom?

9 MS. GATNAREK: Well, I think we're talking
10 about what was referred to as an objective standard.

11 Q. I mean, how does someone who visits the
12 governor's page know what the topic is?

13 A. They read it.

14 Q. They read what?

15 A. The post.

16 Q. And in reading the post, they know what the
17 topic is?

18 A. You're asking me to put myself in the minds
19 of however many people can read the governor's post
20 to say what they think it is.

21 Q. I think that's an important exercise here
22 because we're talking about what kinds of comments
23 will get individuals blocked from governor's pages,
24 and we're discussing repeated off-topic comments.

25 So yes, I am asking you how a user or how a

1 visitor to the governor's page would know whether
2 their comment was off topic.

3 A. They would read the topic of the post.

4 Q. So I'll hand you as an example what we've
5 previously marked as Deposition Exhibit Number 8,
6 and just ask if you -- well, this is a post from
7 Governor Matt Bevin's official Twitter account.

8 Do you see that -- his Twitter handle up at
9 the top there?

10 A. I do.

11 Q. Okay. And do you see that on September 30th
12 he posted, "As the sun sets on another weekend, we
13 are thankful for our beautiful Kentucky home.
14 #weareKentucky."

15 Do you see that?

16 A. I do.

17 Q. And then there's a photo that is hard to see,
18 exactly, because this is a black-and-white copy, but
19 I will submit to you it's a photo of a sunset, what
20 looks to be a sunset, in Kentucky, with the words on
21 top of it, "Kentucky. No place I would rather be,"
22 with a small Kentucky state outline there.

23 Do you see that?

24 A. I do.

25 Q. So how does a user or a visitor to Governor

1 Matt Bevin's official Twitter page know what the
2 topic is of this post?

3 A. They would read it.

4 MR. MEREDITH: Objection. This is beyond the
5 scope of the 30(b)(6) topics, but go ahead.

6 A. They would read it.

7 Q. So what is the topic of this post?

8 MR. MEREDITH: Objection, again. Same
9 objection.

10 A. The topic of this post?

11 Q. Uh-huh.

12 A. Governor Bevin loves Kentucky, and that's
13 what the post is about.

14 Q. So the only comments that would be considered
15 on topic are comments about how Governor Bevin loves
16 Kentucky?

17 MR. MEREDITH: Objection. Same objection.

18 A. Or other people that love Kentucky could
19 comment about that. That's what the -- that's what
20 the post is about.

21 Q. It would have to be about loving Kentucky?

22 MR. MEREDITH: Objection. Same objection.

23 A. No, it wouldn't.

24 Q. Okay. So what -- I believe that's what you
25 said --

1 A. It could be about being thankful for being in
2 Kentucky. It could be about whatever the topic of
3 the post is about.

4 Q. So I asked you: What is the topic of the
5 post?

6 A. I just told you.

7 Q. Okay. When I previously asked you, "What's
8 the topic of this post," you said "Governor Matt
9 Bevin loves Kentucky."

10 A. Yeah. That's one of the topics.

11 Q. Okay. What are some other topics of this
12 post?

13 A. He's thankful.

14 Q. Anything else?

15 A. There's a lot of things. I mean, it's got
16 the weekend, sun setting on the weekend. That's
17 what the post is about.

18 Q. Anything else?

19 MR. MEREDITH: Objection. Again, this is
20 beyond the scope of the 30(b)(6) topics.

21 A. No.

22 Q. So is it the governor's -- I mean, let me
23 rephrase that. I want to make sure not to put words
24 in your mouth, so I want to be clear.

25 Is it the governor's office's position that a

1 visitor to his official social media accounts can
2 know what the topic of the post is just by reading
3 the post?

4 A. I don't understand the question.

5 Q. Previously, I asked you, "How does a visitor
6 to the governor's official social media accounts
7 know the topic of a post."

8 And I believe you responded, "They can read
9 it."

10 A. I did say that. And they can read it.

11 Q. Is there any other way that a visitor to his
12 official social media pages would know the topic?

13 A. Not to my knowledge.

14 Q. Does anyone else have knowledge to answer
15 that question in any other way?

16 A. What's your question?

17 Q. Well, I said to you -- or you responded to me
18 that that's -- not to your knowledge, there's no
19 other way to know the topic of the post other than
20 reading it, not to your knowledge, is what you said.

21 And my question is: Does anyone else have
22 knowledge to answer that question differently?

23 A. I don't know. I mean, people know what's
24 going -- what the post is about by reading it. I
25 don't know how to be any more clear about -- about

1 it.

2 Q. Okay. But I'm not sure that you've answered
3 that last question, which was -- I asked you if
4 there was any other way that a visitor to the page
5 would know the topic of a post besides reading it,
6 and your response was "Not to my knowledge."

7 A. No. You have to read the post to know what
8 it's about. That's what I'm saying.

9 Q. Okay. So when you said "Not to my
10 knowledge," I just want to be clear, are there other
11 individuals who have knowledge to answer that
12 question differently?

13 MR. MEREDITH: Objection, asked and answered.

14 A. What are you asking? I mean --

15 Q. If there's anyone else within the governor's
16 office with knowledge that you may not have to
17 answer this question differently.

18 A. Answer what question?

19 Q. How an individual -- or how a visitor to the
20 Facebook and Twitter pages would know what the topic
21 of a post is.

22 A. My answer is: The only way you would know
23 the topic of a post is to read the post.

24 Q. And is there anyone else within the
25 governor's office with knowledge to answer that

1 question differently?

2 MR. MEREDITH: Objection to the form of the
3 question.

4 A. I mean, you're asking me to prove a negative.
5 No. I mean, I don't even understand your question.
6 The only way you can understand what a post is about
7 is by reading it. I don't know how to be any more
8 clear than that.

9 Q. Mr. Brickman, I've heard you say that several
10 times. The only reason I'm asking about this
11 knowledge question is because it was a response that
12 you gave me when I asked about how a visitor would
13 know, and you said "Not to my knowledge."

14 And my question to you is --

15 A. I should have been more clear and said the
16 only way that somebody reading any of the governor's
17 social media posts can understand what the post is
18 about is by reading it.

19 Q. Thank you.

20 A. If I said "not to my knowledge," I didn't
21 interpret it -- it didn't mean it any other way
22 other than what I just said.

23 Q. Thank you. Now, the policy that we've been
24 referring to in Exhibit 5, which is the Defendant's
25 Responses to Plaintiffs' First Set of

1 Interrogatories, on Page 5, response to
2 interrogatory number 5, this written policy that the
3 governor's office issued in July 2017 says that --
4 up at the top of page 6 there, it references
5 repeated off-topic comments, and this is what we've
6 been discussing as something that may get a user
7 blocked.

8 Was there ever --

9 A. Where are you?

10 Q. Yeah. At the top of page 6. Do you see
11 that?

12 On the second line from the top, it references
13 repeated off-topic comments --

14 A. Uh-huh.

15 Q. -- in a list of the types of comments that
16 will get a user banned -- or could get a user banned
17 from the governor's social media accounts; is that
18 correct?

19 A. I don't understand your question.

20 Q. I'm just asking -- you wanted to make sure
21 that we were on the same page, and I'm just
22 clarifying that we are.

23 A. I'm on page 6.

24 Q. Okay. Up at the top -- well, we can start on
25 line 1. I'll read it into the record.

1 "Unfortunately" -- and this is from the
2 governor's office official statement in July 2017.
3 It doesn't have an exact date, but July of 2017.

4 "Unfortunately, a small number of users
5 misused those outlets" -- meaning the governor's
6 social media platforms -- "by posting obscene and
7 abusive language or images or repeated off-topic
8 comments and spam."

9 Do you see that?

10 A. Yes.

11 Q. Okay. We previously discussed that this is
12 the governor's office official policy about what
13 kinds of comments could get a user blocked from his
14 social media pages, and this statement was issued in
15 July of 2017; is that correct?

16 A. Uh-huh. Yes.

17 Q. Thank you. My question to you is: Before
18 the summer of -- before July of 2017, how would
19 users to the -- how would visitors to the governor's
20 social media pages know that repeated off-topic
21 comments may get them blocked?

22 A. That's always been our policy, since the
23 governor's inauguration. I don't know how to answer
24 the question any other way. I mean, that's always
25 been our policy.

1 Presumably, somebody would know they got
2 blocked after they got blocked by however Twitter
3 and Facebook notifies them. And I testified earlier
4 that people that are blocked can request to be
5 unblocked if they abide by this exact same policy,
6 and that has happened before.

7 Q. Did the governor's office publicize this
8 policy -- which I understand you've testified has
9 been the policy since day one of the
10 administration -- prior to July of 2017?

11 MR. MEREDITH: Objection to the word
12 "publicize." It's vague. Go ahead.

13 Q. Answer, if you can.

14 A. Not to my knowledge.

15 Q. Did the governor's office ever post this
16 policy on his official social media accounts prior
17 to July 2017?

18 A. Not to my knowledge.

19 Q. Is it posted on his official social media
20 accounts now?

21 A. What do you mean by "posted"?

22 Q. Is this policy made available on either his
23 official Facebook or official Twitter page now?

24 A. I don't know the answer to that.

25 Q. What record is maintained -- or I'm sorry.

1 Let me rephrase that.

2 Is a record maintained within the governor's
3 office of individual users who have been blocked
4 from his official social media pages?

5 A. I don't know.

6 Q. Who would know?

7 A. Communications director.

8 MR. MEREDITH: Objection to the extent this
9 is beyond the scope of 30(b)(6) topics.

10 MS. GATNAREK: I think it's pretty squarely
11 within 5, but that's fine because the witness
12 answered that he didn't know.

13 MR. MEREDITH: What was your question? Maybe
14 I didn't understand your question. What did you
15 ask?

16 MS. GATNAREK: Could you read it back? Thank
17 you.

18 (Reporter read from the record as requested.)

19 MS. GATNAREK: The witness testified he
20 didn't know.

21 Q. Is that correct, you don't know?

22 A. (Witness shook head.)

23 MS. GATNAREK: But I do think it falls
24 squarely within the process by which those policies
25 are implemented.

1 MR. MEREDITH: I disagree, but he answered.

2 It's okay.

3 Q. Do you know if -- I'm sorry. Strike that.

4 Do either Twitter or Facebook notify users if
5 they've been blocked from a specific page?

6 A. I can't speak to how Twitter and Facebook
7 operate. I don't know.

8 My understanding is individuals that have been
9 blocked can find out through Twitter or Facebook
10 that they've been blocked, but I can't speak to how
11 that works.

12 Q. I'm only asking because just a few minutes
13 ago, you testified that someone knows they're
14 blocked through however Twitter or Facebook notifies
15 them that they've been blocked, and I wondered if --
16 what that policy -- I wondered what that practice
17 was.

18 A. I don't know. That's a question for Twitter
19 or Facebook.

20 Q. You've referenced several times the -- you've
21 referenced several times that individual users who
22 have been blocked from the governor's official
23 social media pages can request to be unblocked; is
24 that correct?

25 A. Yes.

1 Q. What is that policy or practice?

2 A. There's not a policy.

3 Q. So is there not a written policy about that,
4 about how a user would be unblocked?

5 A. Not to my knowledge.

6 Q. Do you know if -- strike that.

7 Is there a practice by which users can be
8 unblocked from the governor's official social media
9 pages?

10 A. I don't know how you define "practice," but I
11 know that in the past there are individuals that
12 have been blocked that have contacted our office and
13 have agreed to abide by the policies that have been
14 unblocked.

15 So stated another way, being blocked is not a
16 permanent state of mind or state of being, or
17 whatever term you want to use. You can be unblocked
18 if you agree to abide by the policy.

19 Q. Do you know how many people have contacted
20 the governor's office asking to be unblocked?

21 A. I don't. I know at least one.

22 Q. Do you know if there have been any more than
23 one?

24 A. I don't know.

25 Q. Beyond however Twitter or Facebook may notify

1 users that they've been blocked, is there any other
2 way that users who have been blocked from the
3 governor's official social media pages are made
4 aware of that block?

5 A. I don't know.

6 Q. Does the governor's office let individuals
7 know that they've been blocked?

8 A. Not to my knowledge.

9 Q. Does anyone else have knowledge to answer
10 that question?

11 A. The communications director. I think Twitter
12 and Facebook is the entity that notifies them
13 they've been blocked, to my understanding.

14 Q. So you're -- I'm sorry.

15 You don't know if the governor's office
16 notifies people that they've been blocked, but the
17 person who would know is the communications
18 director; is that correct?

19 A. That's correct.

20 Q. Okay.

21 A. My understanding is the individuals find out
22 they've been blocked via Facebook and Twitter.
23 That's my understanding of how this happens in
24 practice.

25 Q. Does the governor's office have an official

1 policy about whether or not to let people know that
2 they've been blocked from his social media accounts?

3 A. I don't know.

4 Q. Does the governor's office have an
5 official -- well, strike that. Doesn't have to be
6 official.

7 Does the governor's office have a specific
8 practice regarding letting people know that they've
9 been blocked?

10 A. I don't know.

11 Q. And when I say "practice," I mean official or
12 unofficial.

13 Does that change your --

14 A. I don't know.

15 Q. Okay. Well, there is some practice that has
16 developed, though, correct, about individuals
17 requesting to be unblocked, because we're aware that
18 at least one individual -- one person has requested
19 this; is that correct?

20 A. What's your question?

21 Q. So my question is: Who developed the
22 practice for -- who within the governor's office
23 developed the practice by which individuals can get
24 unblocked from his official social media pages?

25 A. What is a practice?

1 Again, what -- my understanding of what
2 happened, there was an individual that was blocked
3 that contacted our office asking why he had been
4 blocked. We then communicated with him and
5 explained our policy. That individual agreed to
6 abide by the policy, and he was unblocked.

7 If that is a practice, that is a practice that
8 currently exists where any individual that is
9 blocked can contact our office, agree to the policy,
10 and they will be unblocked.

11 Q. Did that practice exist prior to that
12 individual who contacted your office?

13 MR. MEREDITH: Are you asking whether it had
14 ever been done or whether it was possible to be
15 done?

16 MS. GATNAREK: Both.

17 A. I don't even understand the question.

18 I mean, somebody reached out to our office and
19 asked to be unblocked, and they were. I can't speak
20 to what happened before that, but anyone before that
21 one person could have done the same thing.

22 Anybody that abides by our policy -- obscene,
23 abusive, not repeatedly off topic -- can be
24 unblocked.

25 Now, if someone is unblocked and they violate that

1 policy again in the future, they could be blocked
2 again.

3 Q. Is there a limit to the number of times that
4 someone may request to be unblocked -- let me
5 rephrase.

6 If a person is blocked and requests to be
7 unblocked and they are, and if they then get blocked
8 again, is there a limit to the number of times that
9 someone could go through that cycle?

10 A. I don't know the answer to that, how that's
11 happened in practice. I don't know. But anyone
12 that agrees to abide by our policy will not be
13 blocked.

14 Q. You don't know if that's happened, though --

15 A. I don't.

16 Q. -- is that what you just said?

17 MR. MEREDITH: If what's happened?

18 MS. GATNAREK: If someone has been blocked
19 and unblocked multiple times.

20 MR. MEREDITH: Okay.

21 A. You're asking me if I know if that's happened
22 or not? I don't know.

23 Q. And you don't -- or do you know if there is a
24 limit to the number of times someone could be
25 blocked and unblocked?

1 A. Anybody that abides by our policy will not be
2 blocked. That's the best way I can answer that
3 question.

4 Q. Okay.

5 (A Discussion Was Held Off the Record.)

6 Q. Mr. Brickman, do you know who Drew Morgan is?

7 A. No. I know he's the plaintiff in the case,
8 but I don't know him.

9 Q. Do you understand that he was blocked from
10 accessing the governor's official Twitter page?

11 A. Yes.

12 Q. Why was he blocked?

13 A. I don't know.

14 Q. Who would know?

15 A. I don't know.

16 Q. In preparation for today's deposition, did
17 you ask Ms. Kuhn if she knows why Drew Morgan was
18 blocked?

19 A. I did not.

20 Q. Did you ask the governor if he knew -- if he
21 knows why Drew Morgan was blocked?

22 A. I did.

23 Q. Does he know?

24 A. He does not.

25 Q. Does the governor's office save screenshots

1 of comments that may lead to an individual being
2 blocked?

3 A. I don't know.

4 Q. Does the governor take screenshots of any
5 individual that he may have blocked on Twitter?

6 A. I don't think so.

7 Q. Did you ask him about screenshots -- about
8 whether he takes screenshots of people that he may
9 have blocked on Twitter?

10 A. Just in general?

11 Q. Uh-huh.

12 A. No.

13 Q. In preparation for today's deposition?

14 A. No. I talked to him. I did not ask him
15 that.

16 MR. MEREDITH: I'll object to the extent that
17 that's beyond the scope of 30(b)(6) topics.

18 Q. So does the governor's office have a record
19 of why Drew Morgan was blocked from the governor's
20 official Twitter page?

21 A. I don't know.

22 Q. Do you know who Mary Hargis is?

23 A. I know that's the plaintiff in this case.

24 Beyond that, no, I don't know anything about
25 her.

1 Q. Do you know that she was blocked from
2 accessing the governor's official Facebook page?

3 A. That's my understanding.

4 Q. Why was Ms. Hargis blocked from the
5 governor's official Facebook page?

6 A. I don't know.

7 Q. Does the governor's office have a record of
8 why Ms. Hargis was blocked from --

9 A. I don't know.

10 Q. -- the official Facebook page?

11 A. I don't know.

12 Q. And who would know?

13 A. Communications director. I'm not aware of
14 it.

15 Q. Was that part of the investigation that you
16 undertook in preparation for today's deposition?

17 MR. MEREDITH: Objection to the extent it's
18 beyond -- I'm sorry. Never mind. I'm sorry.

19 A. I don't know anything about why she was
20 blocked, Ms. Hargis.

21 Q. I understand that.

22 I'm asking if -- if you investigated the facts
23 related to the blocking of Ms. Hargis from Governor
24 Bevin's official Facebook account.

25 A. There's no record of it --

1 Q. How do you know --

2 A. -- of any facts.

3 Q. How do you know there's no record of it?

4 A. I'm not aware of any -- that we have anything
5 about her blocking -- the blocking of Ms. Hargis.

6 Q. And where --

7 A. I don't know why she was blocked.

8 Q. So where does your understanding come from
9 that there's no record?

10 A. I don't -- I just -- I don't know. My
11 understanding is she was blocked in December of
12 2015, which is now almost three years ago.

13 Q. Where did that understanding come from?

14 A. Discussions with people in our office.

15 Q. So what investigation did you undertake to
16 determine the facts related to Ms. Hargis being
17 blocked from the defendant's official Facebook
18 account?

19 MS. GATNAREK: Can I ask that the question is
20 pending, so I think it's inappropriate to have
21 communications with counsel while a question is
22 pending.

23 MR. MEREDITH: Sure. And so I'll object to
24 the extent that it calls for attorney-client
25 communications, but you can answer based on any --

1 you know, anything that Elizabeth or Nicole or Woody
2 or anybody else told you.

3 A. What's your question?

4 Q. What investigation did you undertake, in
5 preparation for today's deposition, regarding the
6 facts related to Ms. Hargis being blocked from
7 Governor Bevin's official Facebook account?

8 A. I asked the governor if he's ever heard of
9 her or had anything to do with blocking, and he said
10 no.

11 Q. What else did you do?

12 A. Tried to remember what else was discussed.
13 I've had so many conversations about this, it's hard
14 to remember exactly. I think that's it.

15 Q. And I understand that you don't know why
16 Mr. Morgan was blocked, but what investigation did
17 you undertake in preparation for today's deposition
18 regarding the facts related -- relating to his being
19 blocked from the governor's official Twitter
20 account?

21 A. When I discussed the -- when I talked to the
22 governor, I asked him if he had ever heard of
23 Mr. Morgan or had any idea why he was blocked, and
24 he said no to both questions.

25 Q. Did you do anything else?

1 A. Huh-uh.

2 Q. I'm going to hand you another document that
3 we've previously marked as deposition Exhibit
4 Number 6, and I will -- oh, have you seen this
5 document before?

6 A. Is this different than the other one you
7 showed me?

8 Q. It is very slightly different, and I will
9 explain why. This Exhibit Number 5 was served on
10 one day, and the next day Defendant served the
11 supplemental.

12 The only change is that on the response to
13 interrogatory number 2, there is a list of names.
14 The supplemental responses include the governor's
15 name. The initial responses did not.

16 A. Yes.

17 Q. I will represent that that's the only change,
18 unless counsel has an objection to that.

19 So I just want to refer to Exhibit Number 6
20 for this next line of questioning, because this is
21 the complete list.

22 A. Okay.

23 Q. And I want to ask you about some of these
24 people on this list. Okay? We won't go through all
25 of them, but I do want to ask you about some.

1 And as part of today's deposition, one of the
2 noticed topics for your 30(b)(6) deposition is the
3 involvement of these individuals identified in
4 Defendant's response to interrogatory number 2 in
5 maintaining the defendant's official social media
6 pages.

7 You're the first on that list, but let's come
8 back to you.

9 So first I would like to ask you: What was
10 Jessica Ditto's involvement in maintaining Governor
11 Bevin's official social media pages?

12 A. She was the communications director.

13 Q. And what did she do in that role to maintain
14 the governor's official social media pages?

15 A. She was responsible for them.

16 Q. Did she post content to the governor's
17 official social media pages?

18 A. Yes.

19 Q. Did she block or ban people from those pages?

20 A. No.

21 Q. Did she --

22 A. We're talking -- sorry. Let me look at --

23 Q. Ms. Ditto, Jessica Ditto.

24 A. You're asking for both, for Facebook and
25 Twitter? Let's start over.

1 Q. Sure. Yep. That's a great idea. So let's
2 discuss Jessica Ditto for a moment.

3 You said that she was responsible for the
4 governor's social media pages. Do you mean both
5 Facebook and Twitter?

6 A. Yes.

7 Q. Great. Can you tell me what role she had in
8 maintaining the governor's official Facebook
9 account?

10 A. She posted comments, and she deleted or hid
11 off-topic comments.

12 Q. What about on his official Twitter account?

13 A. She only posted content.

14 Q. And you're getting these answers from the
15 exhibit that we've marked as Exhibit 29, is that
16 correct --

17 A. Yes.

18 Q. -- or from the document that we marked as
19 Exhibit 29.

20 So Catherine Easley has posted content to the
21 governor's office's official Facebook account and
22 blocked or banned people from that account, and she
23 has posted content to the governor's official
24 Twitter account; is that correct?

25 A. Yes.

1 Q. She has not blocked anybody on Twitter, is
2 that correct, or from the governor's official
3 Twitter account?

4 A. That's correct.

5 Q. And she has not deleted or hidden any
6 off-topic or inappropriate Facebook comments on the
7 governor's Facebook page; is that correct?

8 A. That's correct.

9 Q. Andrew King is listed on Exhibit 29 under
10 Facebook as none.

11 What does that mean?

12 A. What does "none" mean?

13 Q. Uh-huh.

14 A. It means he didn't post content, he didn't
15 block or ban anybody, and he didn't delete or hide
16 any comments.

17 Q. And I think you previously testified that he
18 may have had access to the governor's Facebook
19 account, or he did have access to the governor's
20 Facebook account?

21 A. Having access is not the same as doing 1, 2,
22 or 3.

23 Q. I completely understand. I just want to
24 clarify if he had access to the governor's Facebook
25 account.

1 A. Yes.

2 Q. Okay. And then he -- Mr. King, again, on the
3 governor's official Twitter account, it looks like
4 he blocked or banned but did not post content -- did
5 not post content; is that correct?

6 A. Yes.

7 Q. Okay.

8 A. You're basically asking me just to review
9 this sheet with you right now.

10 Q. Well, hold on. We're getting there. So the
11 next person I want to ask you about is Chris Skates.

12 On Exhibit 29, Mr. Skates is listed under
13 Facebook as none, which means he didn't do any of
14 these three things. And he's listed under Twitter
15 as none, which I think means he didn't do any of
16 these things on Twitter either.

17 But do you see that on defendant's response
18 to interrogatory number 2 he's listed as a person
19 who has been involved in, "One, posting content to
20 the governor's official Facebook or Twitter
21 accounts; two, blocking or banning accounts that
22 have made obscene, abusive, and/or off-topic
23 comments on the governor's official Facebook and/or
24 Twitter account; and/or, three, have deleted and/or
25 hidden off-topic or inappropriate comments on the

1 governor's official Facebook account"?

2 Did I read that correctly?

3 MR. MEREDITH: I object to the conflation of
4 the fact that being involved in doesn't necessarily
5 mean --

6 MS. GATNAREK: Well, we're getting -- I'm
7 asking the witness for clarification. Hold on just
8 a moment.

9 Q. Did I read that correctly, Mr. Brickman?

10 A. Did you read what correctly?

11 Q. That last paragraph on page 4 of deposition
12 Exhibit Number 6.

13 A. I didn't follow you word for word on this
14 document when you were saying it, so I can't tell
15 you if you did or didn't read it correctly.

16 Q. Okay. On page --

17 A. If you want me to go through it word for
18 word, we can. I can see if you did, but --

19 Q. In Defendant's supplemental response to
20 interrogatory number 2, which we've identified here
21 as Deposition Exhibit Number 6, Chris Skates is
22 listed in a list of names in that response.

23 Do you see that?

24 A. Yes.

25 Q. Okay. Great.

1 Now, do you see where -- after that list of
2 names, there's a sentence that begins, "These
3 individuals have been involved in."

4 Do you see that?

5 A. Yes.

6 Q. And then that is the part that I read.
7 "Posting content to the governor's official Facebook
8 and/or Twitter accounts; two, blocking and/or
9 banning accounts that have made obscene, abusive,
10 and/or off-topic comments on the governor's official
11 Facebook and/or Twitter accounts; and/or, three,
12 have deleted and/or hidden off-topic or
13 inappropriate comments on the governor's official
14 Facebook account."

15 What involvement did Mr. Skates have on
16 either the governor's official Facebook or official
17 Twitter page?

18 A. He works in the communication operation.
19 These are not -- there's nothing inconsistent about
20 this response and this sheet, if that's what you're
21 asking. The interrogatory response says "involved
22 in."

23 Q. What involvement --

24 A. Exhibit 29 is people that have posted,
25 blocked, banned, deleted, or hidden.

1 Q. What involvement has Mr. Skates had in doing
2 one of the three things that's listed on that
3 paragraph I read into the record from page 4 of
4 Deposition Exhibit Number 6?

5 A. I don't know, other than he works in our
6 communications shop.

7 Q. Who would know?

8 A. The communications director.

9 Q. Do you know why he was listed here in the
10 response to interrogatory number 2?

11 A. Because the response to interrogatory number
12 2 has the words "involved in," and that's broader
13 than what's on Exhibit 29.

14 Q. Okay. Let's put 29 aside for a second.

15 Mr. Skates is listed in response to
16 interrogatory number 2.

17 What has his involvement been in posting
18 content to the governor's official Facebook and/or
19 Twitter accounts?

20 A. I don't know.

21 Q. What has his involvement been in blocking or
22 banning accounts that have made obscene, abusive,
23 and/or off-topic comments on the governor's official
24 Facebook and/or Twitter accounts?

25 A. I don't know.

1 Q. What has Mr. Skates' involvement been in
2 having deleted and/or hidden off-topic or
3 inappropriate comments on the governor's official
4 Facebook account?

5 A. I don't know.

6 Q. Further -- or right after Mr. Skates on that
7 list is an individual named Ben Goldey.

8 What has his involvement been in maintaining
9 the defendant's official social media accounts?

10 A. On Facebook, he posted content. On Twitter,
11 he posted content. That's it.

12 Q. Okay. Right after Ben Goldey is Jordan
13 Morgan.

14 What has her involvement been in maintaining
15 the defendant's official Facebook or Twitter
16 accounts?

17 A. Jordan Morgan blocked and banned people on
18 Facebook. She also deleted and hid off-topic or
19 inappropriate Facebook comments. On Twitter, she
20 also blocked or banned people.

21 Q. Okay. What about several -- one, two, three,
22 four -- four names after her, Leann Veatch?

23 What involvement did Ms. Veatch have in
24 maintaining the defendant's official Facebook or
25 Twitter accounts?

1 A. Her only involvement was deleting or hiding
2 off-topic or inappropriate Facebook comments.

3 Q. And right after her in that list is Jenna
4 Williams.

5 What involvement did Ms. Williams have in
6 maintaining the defendant's official Facebook or
7 Twitter accounts?

8 A. I don't know.

9 Q. Who would know?

10 A. Communications director.

11 Q. And last on the list is Governor Bevin.

12 What involvement has he had in maintaining his
13 official Facebook or Twitter accounts?

14 A. He's had no involvement at all on Facebook.
15 And on Twitter, he has posted content, and he has
16 blocked or banned certain individuals based on our
17 policy.

18 Q. Has Governor Bevin blocked or banned
19 individuals based on your policy since he became
20 governor?

21 A. Yes.

22 Q. And does he still, currently?

23 A. He can.

24 Q. I will show you a document that we'll mark as
25 Exhibit 30 and ask if you've seen this document?

1 (EXHIBIT 30 WAS MARKED FOR IDENTIFICATION.)

2 A. Is this the answer?

3 Q. Yes.

4 A. Hasn't been changed?

5 Q. No.

6 A. Then yes.

7 Q. And you'll see it has the E-filing stamp at
8 the top there.

9 A. I've seen it.

10 Q. One of the noticed 30(b)(6) topics for your
11 deposition today is the factual basis for
12 affirmative defenses asserted in Defendant's answer.

13 So I will ask you to turn to page 11 of that
14 document. Are you there?

15 A. Sure.

16 Q. Great. And I would like to ask you what the
17 factual basis is for the affirmative defense
18 asserted in paragraph number 68.

19 A. Unclean hands, that paragraph?

20 Q. Yes, sir. "The plaintiffs' claims are barred
21 by the doctrine of unclean hands."

22 A. My understanding is the ACLU, nationwide, has
23 only sued Republicans in cases like this. That
24 could lead to the conclusion that this is a
25 political lawsuit, which was further demonstrated by

1 the fact that recently a Kentucky Democratic Party
2 official participated in one of these depositions,
3 which would lead one to the conclusion that this
4 whole thing has just been a political fishing
5 expedition and a complete exercise in politics.

6 Q. So the factual basis for that defense listed
7 in paragraph 68 is -- wait. I'm sorry. Let me
8 rephrase.

9 Are there any other factual bases for that
10 affirmative defense?

11 A. Not that I can think of right now.

12 Q. Are you aware of whether there are any other
13 factual bases?

14 A. No, not right now.

15 Q. Were you previously aware of any --

16 A. No.

17 Q. -- other factual bases?

18 A. No.

19 Q. And is there anyone else who would have
20 knowledge beyond what you've shared today to answer
21 this question?

22 MR. MEREDITH: Objection. You mean other
23 than counsel, or do you mean fact witnesses?

24 MS. GATNAREK: Fact witnesses, yes.

25 Q. Any other individuals with knowledge of facts

1 that support the defense asserted in paragraph 68?

2 A. The communications director may. I don't
3 know.

4 Q. Did you discuss with Ms. Kuhn what the
5 factual bases are for Defendant's affirmative
6 defense in paragraph 68?

7 A. Yes.

8 Q. Did she share with you any factual bases
9 beyond what you've testified to here?

10 A. She did not. Not that I remember, at least.

11 Q. So she may have -- so she may have knowledge
12 of factual bases that have not been testified to
13 here?

14 MS. GATNAREK: Bless you.

15 MR. MEREDITH: Thank you.

16 A. She may. I can't speak for her. Is it not
17 true that the ACLU has only brought these cases
18 against Republicans?

19 Q. I'm not the witness here, Mr. Brickman.

20 What is the factual basis for the affirmative
21 defense asserted in paragraph 69?

22 A. I'll give the same answer for laches way
23 around estoppel.

24 My understanding is one of the plaintiffs in
25 this case, Ms. Hargis, was blocked December 24th,

1 2015. This case was not filed until a year and a
2 half later.

3 With respect to Mr. Morgan, my understanding
4 is he was blocked on or about February 8th, 2017,
5 and this case was not brought until about six months
6 later.

7 So a long period of time had passed, and
8 that's a substantial amount of time. Especially for
9 Ms. Hargis; a year and a half. And another six
10 months for Mr. Morgan.

11 Q. And what is the basis for your testimony that
12 Ms. Hargis was blocked on January 24th of 2015 --
13 December 24th of 2015? I'm sorry.

14 A. My understanding of when she was blocked.

15 Q. Where does that understanding come from?

16 A. Discussion with --

17 MR. MEREDITH: Objection to the extent it
18 calls for attorney-client communications, but you
19 can answer to the extent that you recall from
20 conversations with Nicole or Woody or Elizabeth or
21 anybody else.

22 A. It's just my understanding is that that's the
23 day she was blocked.

24 Q. Have you seen any documentation confirming
25 that?

1 A. No.

2 Q. Do you know where Ms. Burton's understanding
3 of that fact comes from?

4 A. I don't.

5 Q. Do you know where Ms. -- you said Woody was
6 the other person you talked with?

7 A. (Witness nodded head.)

8 Q. Do you know where Mr. Maglinger's
9 understanding of that fact comes from?

10 A. No.

11 Q. Are there any other factual bases that you're
12 aware of for any of the other affirmative defenses
13 listed here that I haven't asked you about?

14 A. No. On paragraph 67, I would like to
15 supplement my answer.

16 Q. Yes.

17 A. About the plaintiffs suffering no injuries;
18 and therefore, having no standing.

19 The two plaintiffs in this case, like every
20 other person out there, should they acknowledge that
21 they would abide by the policies like everybody
22 else, they also would be unblocked.

23 Q. Thank you. But you don't know why either of
24 them was blocked?

25 A. I don't. It's also my understanding that the

1 ACLU may have recruited these two plaintiffs to be
2 plaintiffs, which I think would go to the unclean
3 hands affirmative defense.

4 Q. Anything else?

5 Any other factual bases for affirmative
6 defenses before I move on from that?

7 A. They've been injured not at all.

8 Q. Is that a factual basis or a legal
9 conclusion?

10 A. They could be unblocked if they abide by the
11 policy, so how could they possibly have been
12 injured?

13 You know, the other thing is either one of
14 these plaintiffs -- or anybody, for that matter,
15 could go and create a different account. All of
16 these platforms are publicly available, where if
17 they weren't logged into either one of their
18 accounts, they could read everything on that same
19 account. Therefore, they have no injury.

20 Q. Okay. You previously testified -- and I
21 believe this is noted in the document we've marked
22 as Exhibit 29 -- that Governor Bevin has blocked or
23 banned people from his official Twitter page.

24 And I asked you if you knew whether he had
25 taken screenshots of any of those comments that led

1 to his blocking people, and I think you said that
2 you did not know; is that correct?

3 A. I do not know. I talked to the governor
4 about this. I do not know if he's taken
5 screenshots. I do know that every person that he
6 has blocked has been somebody that violated our
7 policy.

8 Q. How do you know that?

9 A. I asked him.

10 Q. How many people has he blocked --

11 A. I don't know.

12 Q. -- from his Twitter page?

13 Did you ask him?

14 A. I did not.

15 Q. Did he discuss with you any specific
16 circumstances of those blocks?

17 Did he give you any examples?

18 A. He did not give me any specific examples. He
19 did tell me that every person that he's blocked has
20 been blocked for one of three reasons: they've been
21 obscene, they've been abusive, or they've had
22 repeated off-topic comments.

23 Q. Did he indicate to you approximately how many
24 people he's blocked?

25 A. No.

1 Q. Did you ask him approximately how many people
2 he's blocked?

3 A. No.

4 Q. How often does the governor block people from
5 his official Twitter page?

6 A. I don't know.

7 Q. Does he block -- does he block people weekly?

8 A. I just said I don't know.

9 Q. You don't know if he blocks people daily?

10 A. I still said I don't know.

11 Q. Okay. And when we were going through this
12 list of people that are -- that are listed in the
13 defendant's response to interrogatory number 2,
14 which we have as Deposition Exhibit Number 6, you
15 are the first person on that list.

16 Do you see that?

17 A. I am.

18 Q. Great. What involvement have you had in
19 posting content to the governor's official Facebook
20 or Twitter accounts?

21 A. None.

22 Q. What involvement have you had in blocking or
23 banning accounts that have made obscene, abusive,
24 and/or off-topic comments on the governor's Facebook
25 and/or Twitter accounts?

1 A. None.

2 Q. And what involvement have you had in having
3 deleted or hidden off-topic or inappropriate
4 comments on the governor's official Facebook
5 account?

6 A. None.

7 Q. What involvement have you had in monitoring
8 the governor's social media accounts?

9 A. Define "monitoring."

10 Q. Well, I'm reading from this document.

11 So "Subject to that objection, the following
12 individuals have been involved at one time or
13 another in monitoring the governor's social media
14 accounts since December 8th, 2015. Blake Brickman."

15 A. Is there a question there?

16 Q. What involvement have you had in monitoring
17 the governor's social media accounts since
18 December 8th, 2015?

19 A. I don't know what "monitoring" means here,
20 but I can tell you that my involvement in social
21 media, I read what he posts and what the office
22 posts.

23 If that's considered monitoring, I'm involved
24 in that. I don't post, I don't ban, I don't block
25 on the official Twitter or Facebook accounts.

1 Q. And you said you don't delete comments, is
2 that --

3 A. Don't delete comments.

4 Q. When you say you read posts, do you mean
5 before they are published?

6 A. No. Just like everyone else in the public, I
7 read them.

8 Q. After they've been posted to the governor's
9 pages, you may read that them?

10 A. Yeah. And again, I don't know what
11 "monitoring" means.

12 Q. Do you know why you're on this list?

13 A. No. Other than -- no.

14 Q. You may have testified to this previously.
15 And I apologize if you did, but let me just ask it
16 in case.

17 Do you have access to administer the
18 governor's Facebook page?

19 A. No.

20 Q. So you don't have a login --

21 A. No.

22 Q. -- to the governor's page, or administrative
23 privileges?

24 A. No.

25 Q. Do you have access to administer the

1 governor's Twitter page?

2 A. No.

3 Q. So you don't have a login to that page?

4 A. No idea what it is.

5 MS. GATNAREK: I think we're almost done, but
6 if I could just have a few minutes.

7 MR. MEREDITH: Quick break.

8 MS. GATNAREK: Uh-huh. Thank you.

9 (A Discussion Was Held Off the Record.)

10 MS. GATNAREK: We have no further questions
11 for you, Mr. Brickman. Thank you.

12 MR. MEREDITH: I've got a few follow-ups.

13

14 EXAMINATION

15

16 BY MR. MEREDITH:

17 Q. Mr. Brickman, is it your understanding that
18 it is up to the communications director to determine
19 who posts on the governor's official Facebook and
20 Twitter accounts?

21 A. Yes.

22 Q. And is it your understanding that she has
23 discretion in that matter?

24 A. Yes.

25 Q. And is it your understanding that she makes

1 those decisions just based on what she thinks is
2 prudent?

3 A. Yes.

4 Q. And that she doesn't have a policy or written
5 set of guidelines to go by, she just does what she
6 thinks is right?

7 A. Correct.

8 Q. And is it your understanding that it's also
9 within the discretion of the communications director
10 to determine who has access to administer the
11 defendant's official Facebook and Twitter accounts?

12 A. Yes.

13 Q. And is it also your understanding that she
14 exercises that discretion just based on what she
15 thinks is prudent?

16 A. Yes.

17 Q. And that there are no written policies or
18 guidelines that she follows beyond her own
19 understanding of what's prudent?

20 A. There's no written policies or guidelines,
21 that's correct. Whatever she thinks is prudent.

22 Q. Is it your understanding that the
23 communications director determines which members of
24 the governor's office staff are tasked with blocking
25 or banning accounts on Twitter and Facebook?

1 A. Yes, the communications director makes that
2 determination.

3 Q. Okay. And is it your understanding that she
4 explains the policy to those staff members and
5 instructs them on their duties?

6 A. Yes. I talked to her when -- I spoke with
7 the communications director, she told me that
8 everybody on the team understands the policy.

9 Q. Have you spoken with the communications
10 director regarding the blocking of Mr. Morgan and
11 Mary Hargis?

12 A. Yes.

13 Q. And is it your understanding that if anyone
14 would have any knowledge of their blocking, that it
15 would be members of the communications office?

16 A. Yes. I talked to her about this yesterday,
17 refreshed my memory again today, that nobody in the
18 communications office has any knowledge whatsoever
19 about the blocking of Mr. Morgan or Ms. Hargis --
20 let me correct, why they were blocked.

21 Q. So they know that they were blocked, they
22 just -- nobody has any idea why they were blocked?

23 A. Nobody in the governor's office has any
24 knowledge why Mr. Morgan or Ms. Hargis was blocked.

25 Q. Opposing counsel asked you a lot of questions

1 about how a person would know what they're not
2 allowed to post on our Twitter and Facebook pages.

3 Do you have to -- should a person just know
4 from common sense and common decency not to post
5 obscenities?

6 A. Yes. Everybody should know what is obscene,
7 what is abusive. It's common knowledge.

8 Q. And is it common courtesy not to make
9 repeated off -- clearly off-topic comments on a
10 Facebook or Twitter post?

11 A. Yes. Nobody should ever try to hijack a
12 conversation that they didn't start.

13 Q. That's just kind of common sense, right?

14 A. It's common sense.

15 Q. I think earlier we talked about -- you were
16 asked some questions about your involvement with
17 monitoring the social media accounts.

18 Have you ever -- in the past, ever
19 collaborated with the communications director or
20 anyone at the communications office about the
21 content of a post?

22 A. Yes.

23 Q. Okay. Do you --

24 A. I have never uploaded -- I have never posted
25 myself. I have collaborated with others in the

1 communications office about some of the content on
2 the post. But just to the clear, I've never
3 actually posted a comment myself.

4 Q. And do you think maybe that's why you're
5 listed in interrogatory number -- well, whatever
6 that exhibit -- listed there in Exhibit 6?

7 A. Yes.

8 Q. And do you know if the governor has also
9 collaborated in a similar fashion with the
10 communications department when it comes to the
11 content of a post?

12 A. Yes. I mean, he obviously has. I mean, some
13 of the posts are actually videos of the governor.
14 So obviously, he's collaborated on the posts.

15 But maybe I should clarify that when I said he
16 had no involvement whatsoever on the official
17 Facebook, what I should have said or meant to say
18 was he's never actually posted himself. He's never
19 blocked or banned anyone on Facebook or hidden or
20 deleted any comments on the official Facebook.

21 So to that extent, his involvement on the
22 official Facebook is really no different than mine.

23 Q. Okay. Which is just kind of limited to
24 collaborating on the creation of the content that
25 eventually makes it on there?

1 A. Yes.

2 Q. Okay. You also talked earlier about how one
3 would go about understanding what the topic of a
4 post is.

5 If a topic -- or if a post contains a video or
6 pictures or something like that, would the video or
7 the pictures also inform you what the topic is?

8 A. Yes. I think earlier I said he would have to
9 read the post. But in some cases the post is just a
10 video, in which case, he would have to actually
11 watch the video as well, to understand the topic of
12 the post.

13 Q. Mr. Brickman, is the governor's office's
14 policy on blocking Twitter and Facebook accounts
15 viewpoint neutral, or does it -- or do people get
16 blocked based on the viewpoint that they're
17 expressing?

18 A. The office policy is viewpoint neutral. I
19 know for a fact that -- from my conversations with
20 the communications director that there have been
21 people that are -- I could characterize as
22 supporters of the governor that have violated the
23 policy that have been blocked.

24 So it has nothing to do with whether you are
25 for or against the governor or any policies or

1 anything he actually posts. It's strictly whether
2 your comments are obscene, abusive, or repeatedly
3 off topic. It has nothing to do with the content of
4 what you're actually saying.

5 Q. So if you make a comment that is expressing
6 support for the governor or his policies but that
7 comment violates the social media policy, you're
8 going to be blocked?

9 A. Yes. And that's happened.

10 Q. Okay. And similarly, if someone makes a
11 negative comment against the governor or his
12 policies but that comment does not violate the
13 social media policy, that person's not going to be
14 blocked; is that correct?

15 A. Correct.

16 Q. And, in fact, are there comments that are
17 negative toward the governor or his policies that
18 exist on his social media accounts?

19 A. There are many comments that are opposed that
20 do not result in the user being blocked. That
21 happens all the time.

22 Again, it's content neutral in terms of
23 whether you're supportive or opposing either the
24 governor or his policy agenda. Any comment that
25 violates the policy results in a blocking.

1 Q. Okay.

2 A. We also talked earlier about the Facebook
3 filters. Facebook filters, all they do is hide
4 comments. They do not actually result in blocking.
5 It just hides the comment for people that are not
6 on -- that do not have access to the account in the
7 governor's office.

8 People that do not have that access can't see
9 the comments, but people that do have access can see
10 the comments if they make it through -- if they
11 don't make it through the filter.

12 Q. Okay. Have you discussed the purpose of the
13 official social media accounts with the governor?

14 A. I have, many times.

15 Q. Okay. And what is your understanding -- or
16 what is the purpose of the social media accounts?

17 A. The purpose of those social media accounts on
18 Facebook and Twitter is for the governor to
19 communicate his message to the people of Kentucky
20 and whoever else accesses either his Facebook or his
21 Twitter site.

22 Q. Okay. Let's skip back to off-topic comments.

23 When staff members of the governor's office
24 are reviewing posts and looking for off-topic
25 comments, is there kind of a rule of thumb or a

1 general -- not a hard line, but often maybe a
2 threshold line that will result in kind of a --
3 someone being flagged as a repeated off-topic
4 commenter?

5 A. Yes. I mean, repeated, by definition, means
6 more than one. The rule of thumb is generally three
7 or more. From my conversations with the
8 communications director on how it's actually
9 applied, it's generally three or more repeated
10 off-topic comments.

11 It's also, again, from my conversations with
12 the communications director, generally -- or the
13 policy is to err on the side of not blocking, unless
14 it's very, very clear that the individual has
15 repeatedly posted off-topic comments. It's like in
16 baseball, the tie goes to the runner.

17 MR. MEREDITH: Let's take about a 30-second
18 break. I might be done.

19 (A Discussion Was Held Off the Record.)

20 Q. I just want to make sure the record's clear
21 on your and the governor's involvement with posts on
22 social media.

23 We were talking earlier about the fact that
24 you have collaborated with coming up with content of
25 posts and that the governor has collaborated with

1 the communications office when it comes to creating
2 the content for posts. And I think I asked you if
3 that was the extent of his involvement. And I think
4 you said that it was.

5 So I just want to make sure you're talking
6 about when it comes to actually creating content and
7 uploading it to the Internet, when you -- you're
8 just talking about that's -- the extent of the
9 governor's involvement in terms of creating content
10 and uploading it to the Internet just collaborating
11 on the initial creation of the content, correct?

12 A. On Facebook?

13 Q. On Facebook or Twitter -- or on Facebook,
14 yes.

15 A. Yes.

16 Q. And when it comes to Twitter, he probably
17 posts sometimes himself on Twitter, right?

18 A. Yeah. I talked to the governor. He doesn't
19 even have login ability on Facebook.

20 Q. Okay. So the extent of his involvement when
21 it comes to the creation of content for posts is
22 just collaborating with the communications office?

23 A. Yes.

24 Q. Okay. And he also collaborates for Twitter
25 posts, right?

1 A. He does.

2 Q. But he's also capable of making his own
3 posts?

4 A. He is.

5 Q. Okay. When you were talking about
6 collaboration, were you talking about posting and
7 creating content for posts?

8 Is that what we're talking about in terms of
9 collaboration?

10 A. Yes.

11 MR. MEREDITH: I think that's all we have.

12

13 EXAMINATION

14

15 BY MS. GATNAREK:

16 Q. Just a few moments ago you were asked
17 about -- and I think you testified that it's your
18 understanding that some favorable comments -- that
19 some comments favorable to the governor have
20 resulted in someone being blocked from one of his
21 social media pages for having violated the policy;
22 is that correct?

23 Did you testify to that?

24 A. Yes.

25 Q. How do you know that?

1 A. I talked to the communications director,
2 Elizabeth Kuhn, about that, and she confirmed that
3 there have been individuals that objectively are
4 supporters of Governor Bevin and/or his agenda that
5 have violated the policy and have been blocked.

6 Those individuals, like everybody else, could
7 agree to abide by the policy and be unblocked, just
8 like the two plaintiffs in this case.

9 Q. Did you review any documents to confirm that
10 understanding?

11 A. What understanding?

12 Q. That some comments favorable to Governor
13 Bevin have resulted in an individual being blocked
14 for having violated the social media policy?

15 A. I didn't review any documents, but the
16 communications director told me that was the case,
17 that individuals that are supporters of the governor
18 and/or his agenda have been blocked.

19 We do not discriminate based on whether you
20 are a supporter of the governor or opponent of the
21 governor; whether you're for his agenda or whether
22 you're against his agency. It's all about whether
23 you abide by the policy of not posting content that
24 is obscene, abusive, or repeatedly off topic.

25 Q. Did you discuss any specific examples of

1 those blocks with the communications director?

2 A. Which blocks?

3 Q. People who have been blocked for having made
4 comments favorable to Governor Bevin but that have
5 violated the social media policy.

6 A. We did not discuss anything specific, but she
7 told me that she was 100 percent certain that that
8 is the case, that individuals that are supporters of
9 the governor have been blocked.

10 Q. Do you know where her understanding of that
11 comes from?

12 A. I don't.

13 Q. Are you aware of any instances of comments
14 that are favorable to Governor Bevin resulting in
15 the person being blocked from his social media page
16 for violating the policy against repeated off-topic
17 comments?

18 A. I don't have any specific examples for you
19 about anybody being blocked. But I can tell you
20 that our policy, which the communications director
21 confirmed to me, is that if a supporter of Governor
22 Bevin and/or his agenda hijacked posts, posted
23 repeatedly off-topic comments, that individual,
24 regardless of whether they supported him or not,
25 will be blocked.

1 Q. Do you know or did the communications
2 director confirm for you whether anyone has been
3 blocked from the governor's social media pages for
4 having posted repeated off-topic favorable comments
5 on the governor's social media accounts?

6 MR. MEREDITH: I'm sorry. I didn't
7 understand the question. Could you say it again?

8 MS. GATNAREK: Could you read that back?

9 (Reporter read from the record as requested.)

10 A. The communications director confirmed to me
11 that individuals have been blocked that did not
12 abide by our policy, which includes all three of
13 those things. So included in that would be repeated
14 off-topic comments.

15 If you're a supporter of Governor Bevin's or
16 his agenda, you cannot hijack a Twitter post or a
17 Facebook post repeatedly and expect not to be
18 blocked. You will be blocked, like everybody else.

19 Q. But you're --

20 A. Everybody else that violates the policy.
21 Sorry.

22 Q. But you're not aware of specific instances of
23 someone being blocked for having posted repeated
24 off-topic favorable comments toward the governor?

25 A. I can't give you any specific examples or

1 individuals' names. I can only confirm what the
2 communications director told me, which is that is
3 our policy.

4 Q. Is there any documentation that would confirm
5 whether that's true?

6 A. I don't know. Not to my -- I don't -- I
7 haven't seen any.

8 Q. Do you know if any exists?

9 A. I don't know.

10 Q. You clarified with your counsel the role that
11 the Facebook keyword filter plays in the governor's
12 office's ability to monitor his social media pages,
13 and I just wanted to confirm something about that.

14 I understand that we don't have specific
15 words that are in that Facebook keyword filter, but
16 I understand that some of the words contained
17 therein are curse words; is that correct?

18 A. Yes.

19 Q. And that would -- if someone posts one of
20 those curse words on the governor's page, that would
21 be a prohibition of the social media policy against
22 posting obscene content; is that correct?

23 A. Yes.

24 Q. So if somebody posts a comment on the
25 governor's Facebook page that contains one of the

1 curse words or obscene language contained in the
2 keyword filter, I understand that that comment would
3 be hidden; is that correct?

4 A. By hidden -- by hidden, that means that
5 people that are not given access to the site, people
6 that are not on our staff, would not be able to see
7 that comment.

8 Q. Yes. And I --

9 A. The outside world would not be able to see
10 the comment.

11 Q. Yes. Thank you.

12 And I believe you said that if someone were
13 to post one of those comments that got -- that were
14 hidden as a result of the Facebook keyword filter,
15 they wouldn't be blocked from the governor's page;
16 is that correct?

17 A. They would be, if they violated the policy.
18 The filter would not -- the filter -- the Facebook
19 filter does not have the ability to block somebody.
20 The Facebook filter only hides comments that are
21 triggered by one of the words that are inputted into
22 the filter. Facebook filter does not block.

23 Q. Okay. So how would those people end up being
24 blocked?

25 A. One of the individuals on Exhibit 29 that has

1 access to the Facebook account would be able to see
2 that comment and would then block that person
3 because they violated the policy.

4 Q. Okay. And then just to clarify the last line
5 of questioning, I believe, with your counsel was
6 regarding the governor's involvement with posts.

7 There was a line of questioning about
8 collaboration, but I just want to confirm that you
9 discussed with the governor his involvement on his
10 official Twitter page; is that correct?

11 A. I did.

12 Q. And he confirmed for you that he has, on some
13 number of occasions, blocked people on Twitter --
14 blocked people from his official Twitter account?

15 A. The governor has blocked people from his
16 official Twitter account that violated our policy
17 because he or she posted obscene, abusive, or
18 repeatedly off-topic comments.

19 Q. And I believe you testified, but just to
20 clarify, there is not a documentary record of those
21 blocks, is there?

22 A. No.

23 MS. GATNAREK: I think that's it. Thank you.

24 MR. MEREDITH: Got a couple to clarify real
25 quick.

EXAMINATION

BY MR. MEREDITH:

Q. When you talked about the Facebook filter, you said people would be -- comments that are caught in the filter, I think you said something to the effect that people will be blocked because they violate the policy. I just want to make sure we're clear.

Just because a comment is caught by the filter doesn't necessarily mean that person's going to be blocked, correct?

A. Correct.

Q. You still have to go and look at the comment. And if the comment is -- violates the filter -- or I'm sorry.

If the comment violates the policy, that person will be blocked, right?

A. Correct.

Q. But if it doesn't violate the policy, they're not going to be blocked, right?

A. Correct.

Q. So the fact that -- the fact that it's caught by the filter has nothing to do with whether they're going to -- that account's going to be blocked or

1 not, right?

2 A. Correct.

3 MR. MEREDITH: That's all I have.

4 MS. GATNAREK: That's all. Thank you.

5 (A Discussion Was Held Off the Record.)

6 MR. MEREDITH: One more follow-up. I'm

7 sorry. I have just one more.

8 Q. You were asked about Elizabeth Kuhn's
9 understanding regarding positive comments being
10 blocked.

11 Is it your understanding that that's
12 something that would be within her knowledge as the
13 communications director?

14 A. Yes.

15 MR. MEREDITH: That's all I've got.

16 MS. GATNAREK: Thank you.

17 (Deposition concluded at 11:45
18 a.m.)

19 * * *

20

21

22

23

24

25

1 = post content

2 = block or ban based upon policy

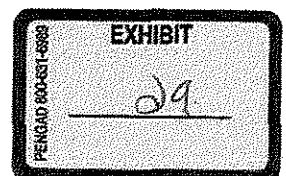
3 = delete or hide off-topic or inappropriate Facebook comments

Facebook

- Blake Brickman: none
- Nicole Burton: 1, 2, 3
- Jessica Ditto: 1, 3
- Catherine Easley: 1, 2
- John Hodgson: 3
- Andrew King: none
- Elizabeth Kuhn: 1, 2, 3
- Woody Maglinger III: 1, 2, 3
- Chris Skates: none
- Ben Goldey: 1
- Jordan Morgan: 2, 3
- Taylor Sears: none
- Kathryn Snively: none
- Amanda Stamper: 1, 2, 3
- Leann Veatch: 3
- Jenna Williams: unknown at this time
- John Zurowski: 1, 2, 3
- Governor Bevin: none

Twitter

- Blake Brickman: none
- Nicole Burton: 1, 2
- Jessica Ditto: 1
- Catherine Easley: 1
- John Hodgson: none
- Andrew King: 2
- Elizabeth Kuhn: 1, 2
- Woody Maglinger III: 1, 2
- Chris Skates: none
- Ben Goldey: 1
- Jordan Morgan: 2
- Taylor Sears: 1
- Kathryn Snively: 2
- Amanda Stamper: 1, 2
- Leann Veatch: none
- Jenna Williams: unknown at this time
- John Zurowski: 1, 2
- Governor Bevin: 1, 2

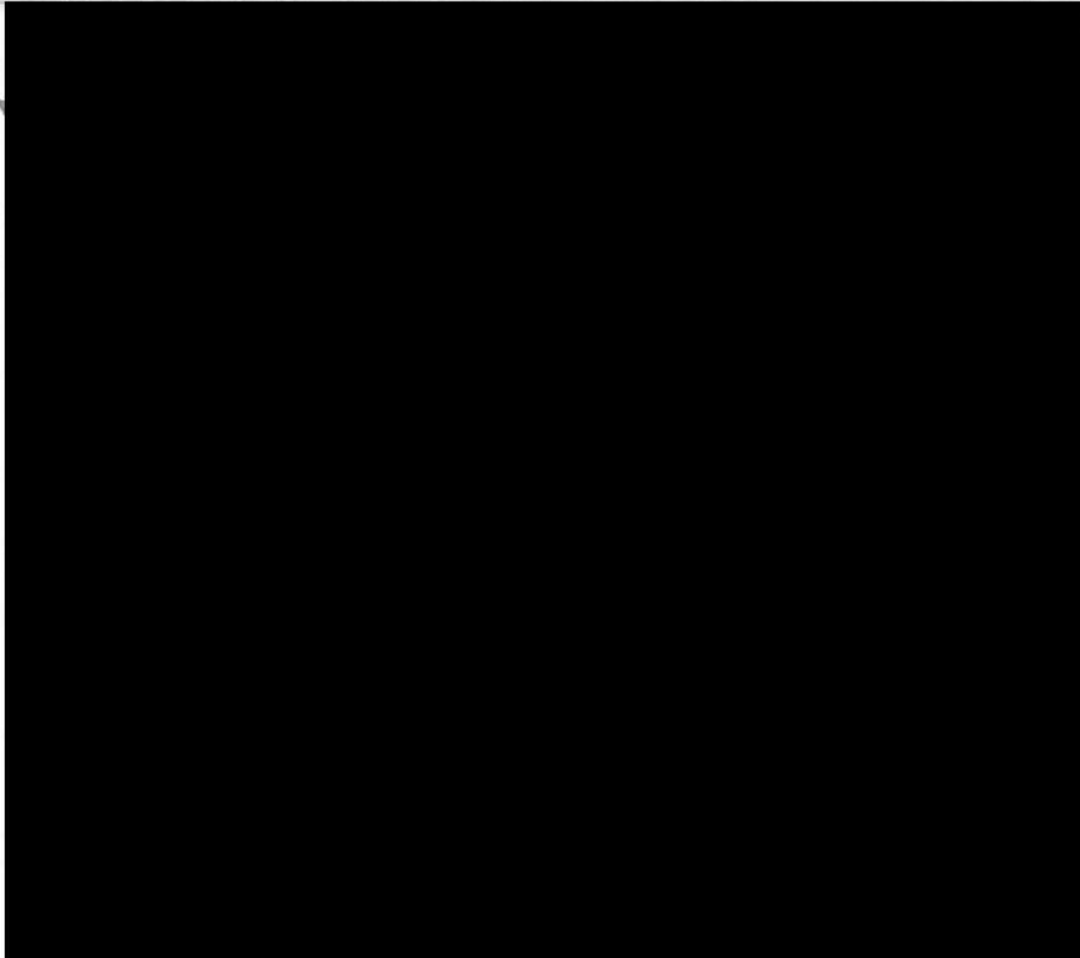


Current Twitter access:

- Elizabeth Kuhn
- Woody Maglinger III
- Nicole Burton
- John Zurowski
- Kathryn Snively
- Governor Bevin

Current Facebook access:

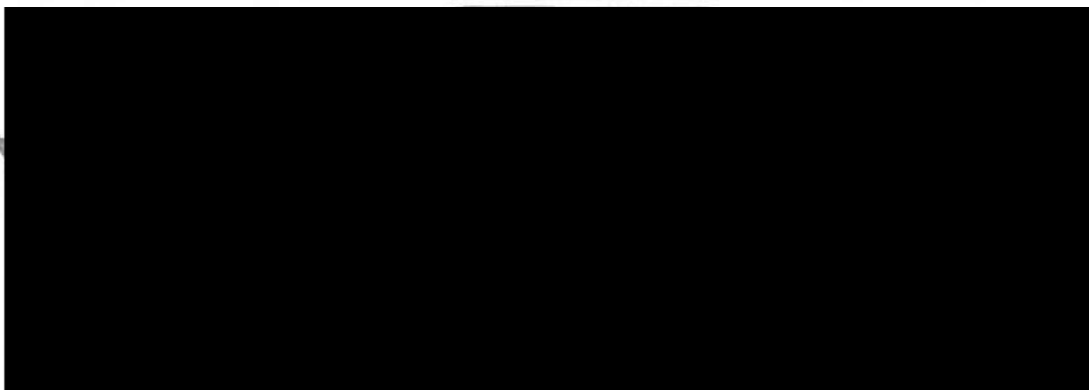
- Elizabeth Kuhn
- Garry Gupton
- John Zurowski
- Woody Maglinger III
- Nicole Burton
- Chase Scott
- Kathryn Snively
- John Hodgson
- Leann Veatch

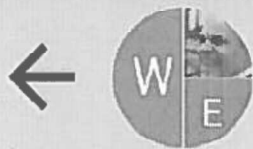


3/6/18 12:55 AM

Governor Bevin

Please block this "Nanahara" woman from any further posts on either FB page...There is a limit on idiocy and she has surpassed it...





Woody, Governor, Elizabeth

Group MMS



6/12/18 12:12 AM


Governor Bevin

Can you please go on FB and remove all posts by Jeff Corley and block him from all our social media platforms?

He is trolling every single post for the past week plus to post unrelated crap ...

Thx...

Woody Maglinger

Will do 

Governor Bevin

Thx...

He tagged every post at least back to May 21st with the same tripe...

Governor Bevin

Also Adam Virts and Stacy McCain McMullin

Thx

Just blocked...thanks!





11/2/17 1:23 AM

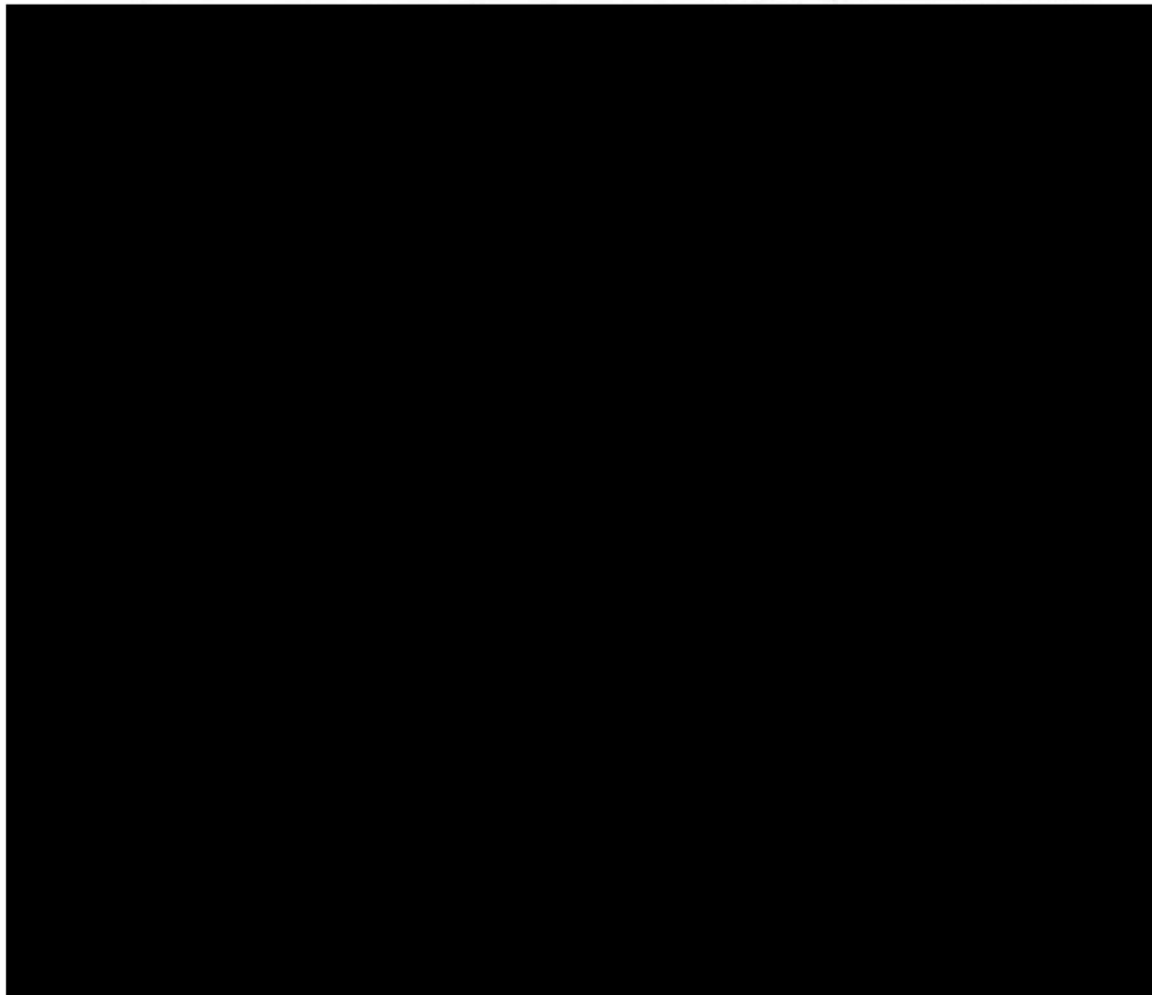
Governor Bevin

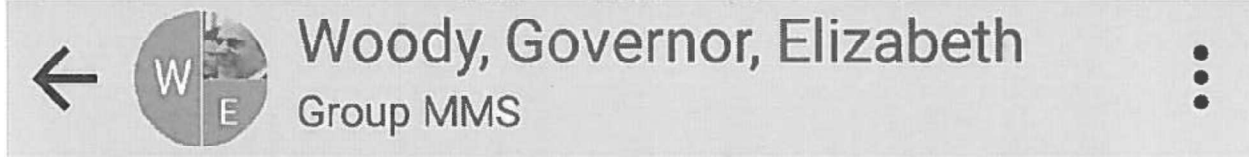
Please sweep out the trash on the Facebook page postings...(such as from "Skoonie Anthony" under the Fritz Winter post...)

Thx

Governor Bevin

Please block that person from all future posts on all sites... 😊





Governor Bevin

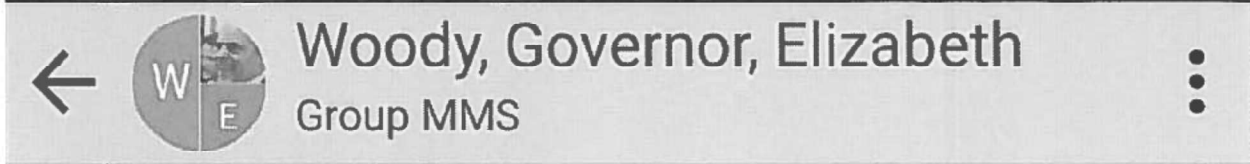
Also tomorrow please block Kathy Kuegel whose "F you" response to the pie lady video is pretty pathetic...

Woody Maglinger

Liked "Also tomorrow please block Kathy Kuegel whose "F you" response to the pie lady video is pretty pathetic..."

Woody Maglinger





6/22/18 11:56 PM

Governor Bevin

Please block Robert Robinson from all future FB posts...

He is a whiny, off topic social media troll and adds no value whatsoever to the dialogue

Thx... 

Elizabeth Kuhn



**Governor Matt Bevin**July 1, 2017 · 🌐...

It seems some in the media are a little confused about the definition of a "lie." Let's check Webster's.



 Watch this video with your friends Start Watch Party

 1.6K 785 Comments 768 Shares 96K Views

 Like  Comment  Share 

[View previous comments](#) Oldest ▾

**Craig Simon** I presumed the vernacular sense of "to lie" is to intentionally deceive. If I call someone a liar, that's what I mean.
Like · Reply · 1y · Edited

available at <https://www.facebook.com/watch/?v=1719065218393364> (last accessed April 29, 2019)

 **Governor Matt Bevin** was live.
August 28, 2017 · 🌐

Q&A with Governor Bevin on Pension Reform



👍❤️ 3.6K 5.6K Comments 1,046 Shares 161K Views

👍 Like 💬 Comment ➦ Share

Most Relevant ▾

 Write a comment... 😊 GIF 🗨

 **Lisa Fuson Evans** · 12:02 I can't believe that being a good employee and showing up for work is frowned upon.....
👍 12
Like · Reply · 1y

available at <https://www.facebook.com/GovMattBevin/videos/qa-with-governor-bevin-on-pension-reform/1742235716076314/> (last accessed April 29, 2019)

**Governor Matt Bevin**October 3, 2018 · 🌐

SHOULD I SHAVE OR SHOULD I GROW?

The choice is up to YOU, Kentucky!

Visit www.governor.ky.gov/shaveorgrow to determine the fate of my facial hair. You'll receive one vote for every dollar donated to First Lady Glenna Bevin's WeAreKY! Foundation. Donations are tax deductible and benefit Kentucky foster care and adoption programs.

Vote EARLY and Vote OFTEN! #WeAreKY



 302

304 Comments 111 Shares 17K Views

 Like

 Comment

 Share



View previous comments

Oldest ▾



James Brown Grow and hope it covers everything.

available at <https://www.facebook.com/watch/?v=2664942547063456> (last accessed April 29, 2019)



Governor Matt Bevin  @GovMattBevin · 15 Feb 2018

During National Salute to Veterans Week, we pay tribute all those who have served in our military—and especially to unsung heroes like the U.S. Army's first female surgeon Mary Edwards Walker. [#WeAreKY](#) [#SalutetoVeterans](#)



National Salute to Veterans Week: The Mary Edwards

During National Salute to Veterans Week, Gov. Bevin recounts the story of the U.S. Army's first female surgeon, Mary Edwards Walker.

[youtube.com](#)



6



9



34



Callie @callie78 · 15 Feb 2018

You showed your respect today when you ignored the '22 strong' You are a [#disgrace](#) to Kentucky. [#VoteThemOut2018](#) [#shameful](#)



2



2



Governor Matt Bevin 

@GovMattBevin

[Follow](#)

Replying to [@callie78](#)

Clearly you were not there when I met with them today and took pictures with them in my office...You might want to do your homework before shooting your mouth off, so you won't look so silly...

6:46 PM - 15 Feb 2018



5





Governor Matt Bevin 
@GovMattBevin

Follow

Early morning, Saturday basketball tournaments... Ahhhh, the joys of parenthood... 😊

#WeAreKY



8:17 AM · 20 Jan 2018

3 Retweets · 98 Likes



💬 10 🔄 3 ❤️ 98 ✉



Tweet your reply



Super Swag @nutter_dog · 20 Jan 2018

Replying to @GovMattBevin

Our boys may not be able to have basketball games without transportation money, but you know that don't you. Private schools and home schools do not get transportation money right? #WeAreKY

💬 1 🔄 1 ❤️ 7 ✉



Governor Matt Bevin  · 20 Jan 2018

My son, whose b-ball game I was watching, also goes to public school...All of us parents were responsible for getting our children to the game. Worked out just fine...At same time, my wife took other son to his public school game in a different location...That's what parents do...

💬 17 🔄 1 ❤️ 8 ✉

 **Governor Matt Bevin** @GovMattBevin · 9 Oct 2018
Early morning view from a room at @LakeBarkleySRP...One of many, incredibly beautiful and affordable gems in Kentucky's State Park system... #WeAreKY



5 6 64

 **WeareFarmers** @TyandBabette · 9 Oct 2018
My family spends a week there every July. Each year, the resort seems a little more tired. Please push through the money needed to update this crown jewel state park.

1

 **Governor Matt Bevin** @GovMattBevin [Follow](#)

Replying to @TyandBabette @LakeBarkleySRP

Thx for your post...This is indeed a crowd jewel 💎 in KY

Many updates in process...The main lodge is being painted for the first time since 1970!!

Previous governors put an average of only \$12K/yr into maintenance per state park for the past 10 years 😞

That is now changing!

11:55 PM · 9 Oct 2018

**Governor Matt Bevin** @GovMattBevin · 9 Nov 2018
Great jobs KEEP coming to Kentucky...47,461 and counting! #WeAreKY #KYMakes



0:18 · 1,460 views

 2  7  45 

**Doug** @Doug55896416 · 9 Nov 2018
I saw you on Levin and thought about moving. The town of Paradise CA was destroyed by fire yesterday where I lived and worked as a carpenter. Kentucky is looking pretty good.

 1   1 

**Governor Matt Bevin** @GovMattBevin [Follow](#)

Replying to @Doug55896416

We would welcome you with open arms!

There are tremendous employment opportunities here in KY...The cost of living is below the national average, the quality of life is extraordinary and our citizens are gracious & hard working people with good, solid American values

#WeAreKy

1:06 AM · 12 Nov 2018



Governor Matt Bevin @GovMattBevin · 17 Aug 2018

Op-Ed: IN DENIAL Bevin's tough talk is a dose of reality

By Jim Paxton, @PaducahSunNews > > > bit.ly/2vTLCQH



6



11



21



Bob Bowman @rbowman271 · 17 Aug 2018

So going to raise taxes on tobacco, alcohol, and rich folks to pay for it? Or on poor people...?



1



Governor Matt Bevin ✓ @GovMattBevin

Follow

Replying to @rbowman271 @PaducahSunNews

So who do you think consumes the most tobacco and alcohol (both in absolute quantity, but even more so as a percentage of their income)?

Rich people or poor people?

2:00 PM - 18 Aug 2018



Governor Matt Bevin  @GovMattBevin · 4 Apr 2018

(2/3)

Their phony, hypocritical attacks ring are pathetic...

The truth is, they despise him because he is rare combination of intellect, competence and fearlessness and their liberal friends feel threatened by him...

 35  14  83 



Austin Brown @AustinMcBrown_ · 4 Apr 2018

With all due respect, governor, this should be saved for your personal page. Or not even said at all

 1   8 



Governor Matt Bevin 

@GovMattBevin

[Follow](#)

Replying to [@AustinMcBrown_](#)

With all due respect in return, if you don't think that the role of EPA Commissioner has a direct and meaningful impact on Kentucky, you are not paying close enough attention...

7:46 AM - 4 Apr 2018

 6   



Governor Matt Bevin @GovMattBevin · 17 Nov 2017

Just another night at Rupp Arena... 🏀 #WeAreKY



45 10 94



Kojak Card @LvilleCardFan70 · 17 Nov 2017

Just shows your true colors. What a POS! Thanks for all you've done in the Ville.

#udisgustme

1 2 3



Governor Matt Bevin ✓

@GovMattBevin

Follow

Replying to @LvilleCardFan70

An interesting reply from someone with a twitter "bio" like yours...Hmmmmm...Hope they don't talk like that at the church you love...

6:42 PM - 17 Nov 2017

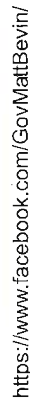
**robertMIII** @robertMIII · Mar 6
Replying to @DrewKazee @GovMattBevin and 2 others
Because Kentucky votes for Governor in off election years many minorities and lower income folks don't know to vote!! We must get out the vote to get the tea party TRUMP and Invanka lover Bevin out!!!
3 3 24

**Governor Matt Bevin**  [Follow](#)
@GovMattBevin
Replying to @robertMIII @DrewKazee and 2 others
Your insulting tweet may be one of the most racist and bigoted comments I have seen on Twitter in a very long time....
7:18 PM - 6 Mar 2019
3 Likes
25 3

**Eddy Bushelman** @EddyBushelman · Mar 6
Replying to @GovMattBevin
Come on now, do you really have the credibility to correct someone on decency? Really?
1 1 49

This Tweet is unavailable

**drew kazee** @DrewKazee · Mar 6
Replying to @GovMattBevin @robertMIII and 2 others
Sorry Mr. Bevin, I felt the same way when you called us "mindless liberals". I was born and raised in Ky. and been here for 63 years.
1 34



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

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

Chat (46)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT

DREW MORGAN AND MARY HARGIS)
)
 Plaintiffs)
)
 vs.) CASE NO. 3:17cv00060
)
 MATT G. BEVIN, in his)
 official capacity as Governor)
 of Kentucky,)
)
 Defendant.)

* * *

The deposition of **AMANDA STAMPER**, taken
pursuant to notice by the Plaintiffs on October 23,
2018, in the offices of Baldani Law Group, 300 West
Short Street, Lexington, Fayette County, Kentucky.

JENNIFER R. JANES, RPR, CRR
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(502) 585-5634
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www.mclendon-kogut.com

1 that's impossible for me to do.

2 Q. That's okay.

3 A. Okay.

4 Q. That's totally fine. It was a little -- it was
5 different, so I wanted to make sure we had it clear,
6 and if it's that you don't know, that's fine.

7 A. So you would need to ask Woody whether he was
8 trained before or after.

9 Q. Okay. So with respect to you said that
10 everybody before they were involved in managing
11 social media, the comments and blocking people, you
12 said they were provided with some sort of a verbal
13 training?

14 A. Correct.

15 Q. Is that correct? Okay. Can you describe what
16 that verbal training looked like?

17 A. Sure.

18 Q. If you were to train me, what would you tell
19 me?

20 A. Sure. So we need you to monitor the Facebook
21 page, the Twitter account. Anybody that posts
22 offensive, abusive language is blocked. If there is
23 anybody that you notice that is repeatedly posting
24 off-topic comments, they're blocked as well.

25 Q. Okay. And so who -- you -- did you provide

1 that -- let me take a step back.

2 Was there anything else, other than that
3 explanation that you just gave me, anything else that
4 was provided as part of the training before they were
5 able to take on the task of managing and monitoring
6 the social media?

7 A. Just that -- to always err -- and part of that
8 too was to always err on the side of caution, you
9 know. If you doubt whether or not something is off
10 topic or repeatedly off topic, always err on the side
11 of caution and just leave it.

12 Q. So other than those two sort of general
13 statements, was there any other specific training
14 provided, any handouts?

15 A. No.

16 Q. Any examples shown?

17 A. No.

18 Q. And so the training that we just discussed, you
19 were the one who provided that to Woody?

20 A. I'm sure that I did. I would be speculating.
21 To say with a hundred percent certainty, no, but I
22 believe -- if I didn't, Nicole did.

23 Q. Okay.

24 A. Because Nicole is the social media manager, so
25 I either asked her to or I did it myself, and I

1 asked you whether a comment was abusive, without
2 necessarily remembering exactly what they asked you,
3 but whether someone did ask you?

4 A. Sometimes when they would first start they
5 would say, "I don't know," you know, test the waters,
6 but after that it's -- I mean, it's pretty clear.

7 We always erred on the side of caution, and so,
8 I mean, it really had to be bad, you know. Not like
9 you suck or, you know, stuff like that, but actual
10 hate.

11 Q. And is a user blocked after one abusive
12 comment?

13 A. I couldn't answer that with certainty.

14 Q. Okay. In your general policy, was it a policy
15 to block someone after one abusive comment?

16 A. Any -- yes. I mean, yes.

17 Q. Were there any times that you can recall where
18 there was a disagreement about whether a comment was
19 abusive?

20 A. No.

21 Q. Okay. What kind of comments are obscene?

22 A. Curse words, for the most part. Using, you
23 know, profanity. Posting profanity using other
24 character letters, you know, anything that if someone
25 came and saw the post, that they would clearly be

1 able to read that it was obscene.

2 Q. Is the discretion of whether a comment is
3 obscene, was that left to the person who was
4 monitoring social media?

5 A. On the side, erring on the side of caution,
6 yes.

7 Q. And was there any way somebody who visited the
8 Facebook page knew what kind of comments your office
9 would consider obscene?

10 A. By visiting the page, just looking at the page?
11 Can you clarify what you're asking?

12 Q. Well, let's start with by looking at the page.
13 Was there a way that a Facebook user could tell what
14 you-all would consider obscene?

15 A. I'm trying to remember. I can't remember.

16 Q. Okay. So you can't --

17 A. I haven't looked at the page in months, so I
18 can't remember.

19 Q. So you can't recall anything now?

20 A. I can't recall.

21 Q. Is there any other way that you can recall that
22 a user on Facebook would be able to tell or have an
23 idea of what your office would consider obscene?

24 A. No.

25 Q. And with respect to Twitter, was there a way

1 A. They would appear to be. Now whether or not
2 they changed one word in the middle of the middle of
3 a post, I can't say.

4 Q. But something that appears to be --

5 A. But it was still the same off-topic comment
6 with the same meaning, same purpose.

7 Q. Okay.

8 A. Whether the words were exactly the same, I
9 can't answer that with certainty.

10 Q. Okay. And are we talking across three posts,
11 four posts, five posts?

12 A. So the minimum would be three.

13 Q. And is there a time period, so if somebody made
14 what somebody would consider -- if somebody said
15 Remember in November to that post, and then a week
16 later made the same comment, Remember in November,
17 and then a week after that made another Remember in
18 November.

19 A. There was no documentation of when somebody
20 made an off-topic comment and then, you know, looked
21 at a week later to see was that there. I mean, there
22 would be no way. What you're saying would be
23 impossible to monitor.

24 Q. So how was it monitored to see if it was
25 repeated over time?

1 A. Have I ever seen this document before? No, I
2 don't think so.

3 Q. Earlier you said you had seen some Twitter or
4 Facebook posts.

5 A. I don't recall seeing this.

6 Q. Okay. This is a tweet that was posted by
7 Governor Bevin on September 30th, correct?

8 A. It appears so, yes.

9 Q. And can you read the text of the post?

10 A. "As the sun sets on another weekend we are
11 thankful for our beautiful Kentucky home. We are
12 Kentucky."

13 Q. Okay. So in your -- let me strike that.

14 What is -- what would you consider to be the
15 topic of this post?

16 A. Just a feel good, celebrate Kentucky post.
17 Just an evergreen, sort of no -- just a very general
18 post, yeah.

19 Q. So does that mean --

20 A. About Kentucky.

21 Q. What sort of comments would be considered off
22 topic if it's generally about Kentucky?

23 A. I mean, I think on-topic comments would be
24 about the beauty of Kentucky.

25 Q. So limited to the beauty of Kentucky?

1 A. Just to monitor the replies.

2 Q. Was there any other purpose to reviewing those
3 replies?

4 A. Just to monitor the same way that we did, as we
5 did on Facebook.

6 Q. Okay. Did you monitor the replies to get a
7 flavor of what people were saying in response to the
8 Governor's replies?

9 A. Can you clarify what you mean by "the flavor of
10 what people are saying"?

11 Q. A sense, a general sense of what people were
12 saying in response to the Governor's, the tweets?

13 A. I mean, generally, yes. I mean, we did that
14 with both.

15 Q. Why did you do that?

16 A. I mean, sometimes we would get constructive
17 feedback or that we could use to help address
18 concerns or issues.

19 Q. Did anybody ever ask you about how a tweet was
20 received by the Twitter users?

21 A. There would be conversation after, you know.
22 If something was well received in our office we would
23 say, "Oh, we need to do more posts like that," but
24 no, other than that, not really.

25 Q. Did you have conversations with Nicole about

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT

DREW MORGAN AND MARY HARGIS)
)
 Plaintiffs)
)
 vs.) CASE NO. 3:17cv00060
)
 MATT G. BEVIN, in his)
 official capacity as Governor)
 of Kentucky,)
)
 Defendant.)

* * *

The deposition of **ELIZABETH KUHN**, taken
pursuant to notice by the Plaintiffs on October 16,
2018, in the Kentucky State Capitol Building, 700
Capitol Avenue, Room 107, Frankfort, Franklin County,
Kentucky.

JENNIFER R. JANES, RPR, CRR
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www.mclendon-kogut.com

1 A. Okay.

2 Q. What kind of comments are obscene? And let
3 me -- again, I'm going to refer to comments, and if
4 there's a difference between Twitter and Facebook
5 will you let me know? Otherwise, can we assume that
6 we're talking about both? If that's not okay with
7 you we can do each one separately, but it might be
8 easier.

9 A. Yes, that's fine.

10 Q. Okay.

11 A. Yes.

12 Q. Okay. So what kind of comments are obscene?

13 A. Comments that are vulgar. That would include,
14 you know, swear words, also emojis, offensive emojis
15 such as a middle finger.

16 Q. Okay. Who decides whether a comment is
17 obscene?

18 A. Whoever is moderating and reviewing the
19 comment.

20 Q. Is there a review or approval process regarding
21 whether a comment is obscene?

22 A. Can you define what you mean by "review
23 process"?

24 Q. Does anybody need to check with any other
25 individual in the -- on your team before determining

1 Q. Is there a distinction -- sometimes you've
2 referred to off topic and sometimes it's referred to
3 as repeated off topic.

4 A. Uh-huh.

5 Q. Is there a distinction in terms of what would
6 cause somebody to be blocked or banned?

7 A. No.

8 Q. So a single off topic could cause somebody to
9 be blocked?

10 A. No, it's -- to be blocked for being off topic
11 you would have to make repeated off-topic comments.

12 Q. And what is your understanding of repeated?

13 A. So I follow kind of a general rule of thumb of
14 three within one post. If I see someone, and you can
15 tell because it's usually a copy and paste job, if I
16 see three or more of those in one post, then I will
17 block that person.

18 Q. And so it has to be within the one post, not
19 within other -- like so if somebody made what you
20 would consider off topic on, you know, October 10th,
21 and then they also had made the same one October 3rd,
22 and then October 1st, would that warrant them being
23 blocked, in your opinion?

24 A. No.

25 Q. And from whom did you learn that sort of rule

1 message we want to get out. For example, this month
2 is manufacturing month in Kentucky, and so we've done
3 several posts about manufacturing month because it is
4 the month of October, and that's something that is
5 important to the economy of the state, is
6 manufacturing.

7 Q. Can you give me an example, speaking of
8 manufacturing, an example of what an off-topic
9 comment would be to a post about manufacturing in
10 Kentucky?

11 A. Sure. So if someone was promoting a product
12 that they were selling, and they did that in three
13 different comments talking about that particular
14 product, that would be something that would be off
15 topic.

16 Q. What about noncommercial off topic?

17 A. That would be the same. If someone posted
18 three times. For example, we have -- I'll give you
19 an example of we have a group that posts a lot about
20 medical marijuana and the comments. If they posted
21 that same post three times related to medical
22 marijuana, that would be something we would consider
23 as blocking the account.

24 THE WITNESS: If we could, I'd like to go ahead
25 and take a break.

1 process of reinstating people's accounts. So what's
2 your understanding of that process?

3 A. My understanding is that if someone contacts us
4 and said -- and says that they would like to be, you
5 know, reinstated, have a particular account
6 reinstated on Facebook or Twitter, we send them a
7 form paragraph saying do you agree to abide by our
8 social media policies. If they say yes, then we
9 unblock them.

10 Q. And how do they know to contact you or who to
11 contact about becoming unblocked?

12 A. Our contact information for the Governor's
13 office is generally available online, on our website,
14 several different ways that they could get that
15 information.

16 Q. But in terms of specifically about -- there's
17 no specific information about contacting someone in
18 the Governor's office about being unblocked?

19 A. Not that I'm aware of.

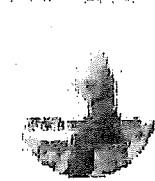
20 Q. You were just referring to the general contact
21 information that's available anywhere, you know,
22 either on media pages or on the Internet?

23 A. Correct.

24 Q. I'm going to hand you what's been marked as
25 Exhibit 11.



available at <https://twitter.com/GovMattBevin/status/914862057614344193> (last accessed April 29, 2019)



Navigail™ @babbigailscott 10m

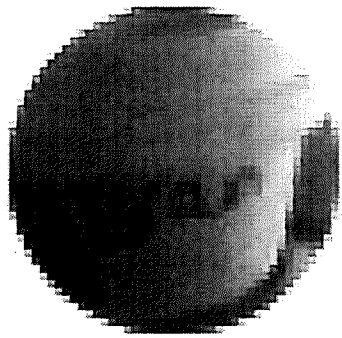
I lived in a country w 4 terror attacks in a year. you can't regulate evil, but you can sure as hell reduce the # of ppl killed by that evil

Governor Matt Bevin @Gov...

To all those political opportunists who are seizing on the tragedy in Las Vegas to call for more gun regs...You can't regulate evil...



REDACTED

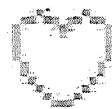
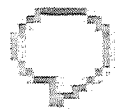


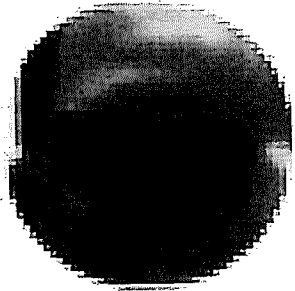
Brian Reitz @flippeman75

26m

Replying to @GovMattBevin

You can reduce their ability to get the damn guns, though. An evil guy with a stick on the 34th floor can't inflict as much damage. Get that?





TR @ThankmaRrr

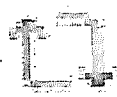
13m

Replying to @GovMattBevin

You're supposed to regulate guns,
not an abstract concept, nitwit!

Was your tweet prepared for you by
your sponsors at #NRA ?

Rot in hell





Fuck Conservatives @FuckCons · 3h

Replying to @GovMattBevin

maybe you should stop shilling for the NRA



26



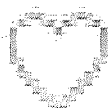


Sammy @whynot9889

485

Replying to @GovMattBevin @Estleton...

You can't regulate evil but you sure
in hell don't need to enable
them. That is what closed minded
Repubs are doing. No prayers, act
now 🇺🇸🇺🇸





David Simon

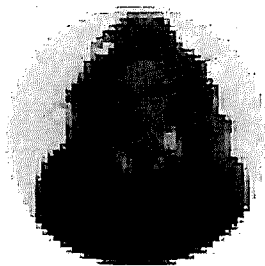
@AoDespair

Replying to @GovMattBevin

Repeal those laws on murder,
drunk driving and bribery of public
officials for starters. Fuck it. Law
itself can't work.

6:16pm · 2 Oct 2017 · Twitter for iPhone

10 REPLIES 19 RETWEETS 151 LIKES



Hermione @HermionelsHere

5m

Hey @GovMattBevin you're either an f'ing coward or bought and paid for by NRA. Which is it?

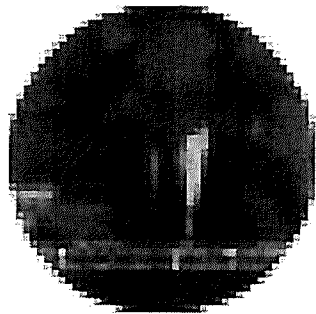
Kimberly(RESIST) @Kmich718

Replying to @GovMattBevin

What a pathetic response. "Well since "evil" will be "evil" no sense in trying 2 fight it..." Well, FU. WeR going 2 fight against evil & U.



...

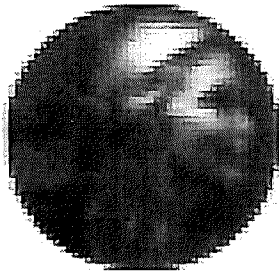


Enough Trump Spam @enoug... 3m
Well hell I guess we don't need laws then.

Governor Matt Bevin @Gov...

To all those political opportunists who are seizing on the tragedy in Las Vegas to call for more gun regs... You can't regulate evil...





Magellan's Wife @FallingOffE... 30m

Replying to @GovMattBevin

.You're right we can't. However we can make it a hell of a lot harder for evil to do its business. Our current regs facilitate & encourage it



REDACTED

GOV000270



Gloria Erickson ★

@GloriaErickson2

Follow

@GovMattBevin WTF This IS the time to talk
about gun control! #GunControlNow

11:52 AM - 3 Oct 2017





lindsey b

@lpbree

Follow

still can't believe this moronic carpetbagging bible thumping FOOL spewed this nonsense I HATE U @GovMattBevin get tf out of my commonwealth

Governor Matt Bevin ● @GovMattBevin

To all those political opportunists who are seizing on the tragedy in Las Vegas to call for more gun regs...You can't regulate evil...

2:33 PM - 5 Oct 2017



GOV000761



Not Backing Down

@Pie_SocialMedia

Follow

GOV000839

Replying to @Pie_SocialMedia @GovMattBevin

We must not give up & say, "we can't stop criminals so don't bother." Hell NO! We can pass common sense gun laws that protect LEO & citizens

4:53 PM - 2 Oct 2017

4 Retweets 1 Like



4



1





Adam O. Mega

@PennSavvy

Follow

Replying to @GovMattBevin

What the hell are you talking about? Why do we have prisons, then?

4:51 PM - 2 Oct 2017





Governor Matt Bevin ● @GovMattBevin · 10h

To all those political opportunists who are seizing on the tragedy in Las Vegas to call for more gun regs...You can't regulate evil...



13K



2.2K



4.6K



Nadine Truong

@NadineTruong

Follow

Replying to @GovMattBevin

Of course you can. Do you let rapists walk free because "you can't regulate evil"? Stupid. Have a good time in hell, sir.

7:51 PM - 2 Oct 2017





Governor Matt Bevin ● @GovMattBevin · 11h

To all those political opportunists who are seizing on the tragedy in Las Vegas to call for more gun regs...You can't regulate evil...



14K



2.7K



5.6K



Chris

@thedarkmanchris

Follow

Replying to @GovMattBevin

But you can regulate access to the tangible
shit "evil" has access to.

#missmewiththatshittyexcuse

9:43 PM - 2 Oct 2017 from New York, USA





Matt Andisik

@TheDon101300

Follow



Front-runner for clown of the day
@GovMattBevin. Of course you can't regulate
evil, but you sure as hell can limit the damage
one can do.

Governor Matt Bevin ● @GovMattBevin

To all those political opportunists who are seizing on the tragedy in Las Vegas to call
for more gun regs...You can't regulate evil...

10:06 PM - 2 Oct 2017



1





Governor Matt Bevin ● @GovMattBevin · 24h

To all those political opportunists who are seizing on the tragedy in Las Vegas to call for more gun regs...You can't regulate evil...

💬 17K 🔄 5.2K ❤️ 11K 📊



Steven Camisa

@spartangolfer33

Follow

Replying to @GovMattBevin

It's asinine we allow assault weapons or the ability to modify a weapon to discharge dozens of bullets in seconds in America. F*** lobbyists

10:20 AM - 3 Oct 2017

💬 🔄 ❤️ ✉️



Governor Matt Bevin ● @GovMattBevin · 11h

To all those political opportunists who are seizing on the tragedy in Las Vegas to call for more gun regs...You can't regulate evil...

13K 2.5K 5.3K

susan

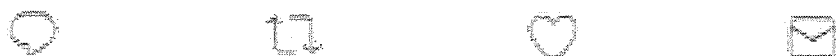
@susan_noble

Follow

Replying to @GovMattBevin

People died just quit with YOUR political bullshit!

2:36 PM - 2 Oct 2017





Joel Kasnetz @kasnetz

37

Japan had 6 gun deaths in 2014.
I'd say they're actually pretty damn
good at regulating evil.

Governor Matt Bevin @Gov...

To all those political opportunists
who are seizing on the tragedy in
Las Vegas to call for more gun
regs...You can't regulate evil...



REDACTED

REDACTED

GOV001123



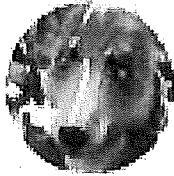
Kathleen Schatzberg @ksch... 20m

Replying to @GovMattBevin @Corcora...

What the hell are laws for, then??

Of course you can regulate. Can't
100% eliminate violence but surely
can reduce. #GunControlNow

REDACTED



Sam D @insideoutside15

1h

Dozens of people are dead and
hundreds wounded, you fucking
ghoul #GunContolNow
[twitter.com/GovMattBevin/s...](https://twitter.com/GovMattBevin/status/1125000000000000000)



SCARY annie @anniegriggs_

22m

So why the fuck am I still taking my
shoes off at the airport?

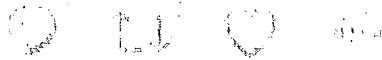


Jane Sparks @sparksDer

2h

Replying to @GovMattBevin

That's such BS. You can make it
harder to get guns the average
person had no business having.
Such a cop out!



REDACTED



CK @choney_2k14

2h

Yes. you can...that's the whole
damn point...keeping guns out of
the hands of evil people.

REDACTED

REDACTED



Dino Goldie @dinogoldie · 38m

Replying to @GovMattBevin

But you can regulate guns. Evil intentions don't kill without bullets and guns to fire them. Dickhead.



1





Jordan @kidd_culi · 5m



Replying to @GovMattBevin @POTUS

You have a lot of balls to say "you can't regulate evil" — evil is YOU taking away healthcare from 400k of your constituents, hypocrite.





Pharband @PharBand · 2m

Replying to @JoyAnnReid

Puleeeze @GovMattBevin! No one, agsin, no one NEEDS an auto machine gun or any other assault rifle, nor silencers. Stop the good vs evil BS.





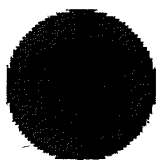
Cameron Lamp @camcamlamp · 34m



Replying to @GovMattBevin

Fuck you dude. You can regulate automatic assault rifles & extended mags to save lives. Is the NRA more important to you than real people?





☆_☆Pretty Amazing☆_☆ @xoxoARTxoxo · 15m



Replying to @GovMattBevin

BUT you can regulate how the evil has such access to legal/illegal guns and rifles dumba**.



1



2



●●●○ AT&T LTE

12:30 PM

📶 48% 🔋



Tweet



Lara Christ @Laralelle · 11h



Replying to @GovMattBevin

Did you know teachers need a higher level of education than governors do? Yet you think you know more about my job than me. ????



↻ 1

❤ 14



Lara Christ @Laralelle · 11h



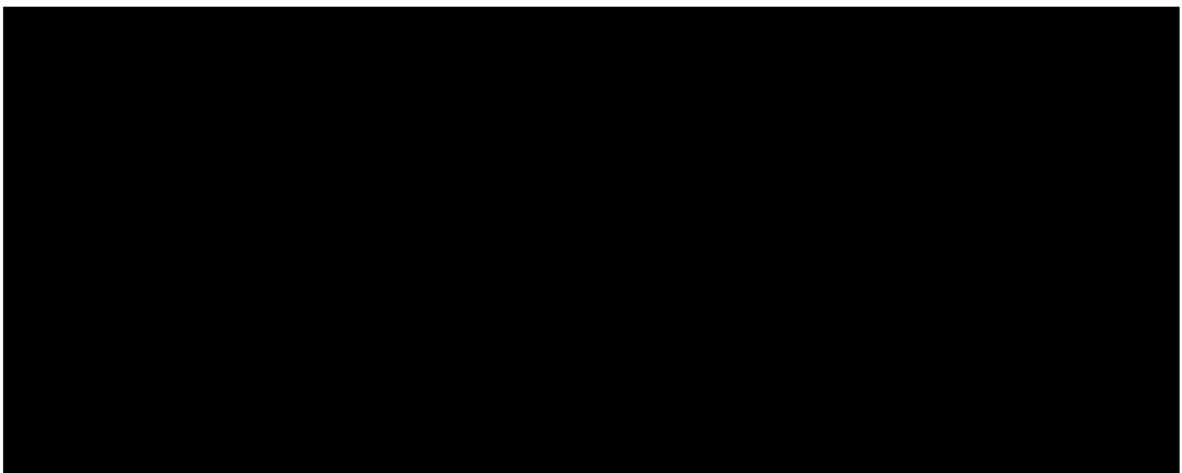
Replying to @GovMattBevin

Ypu spoke. That's all. You didn't listen. You don't listen. You just want to hear your own voice.



↻

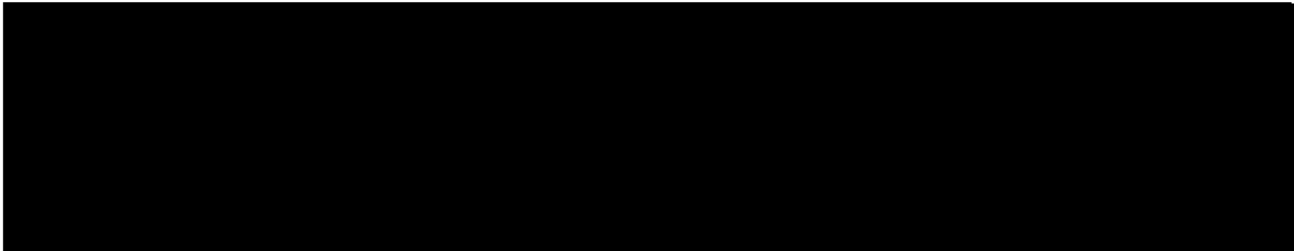
❤ 11



Tweet your reply

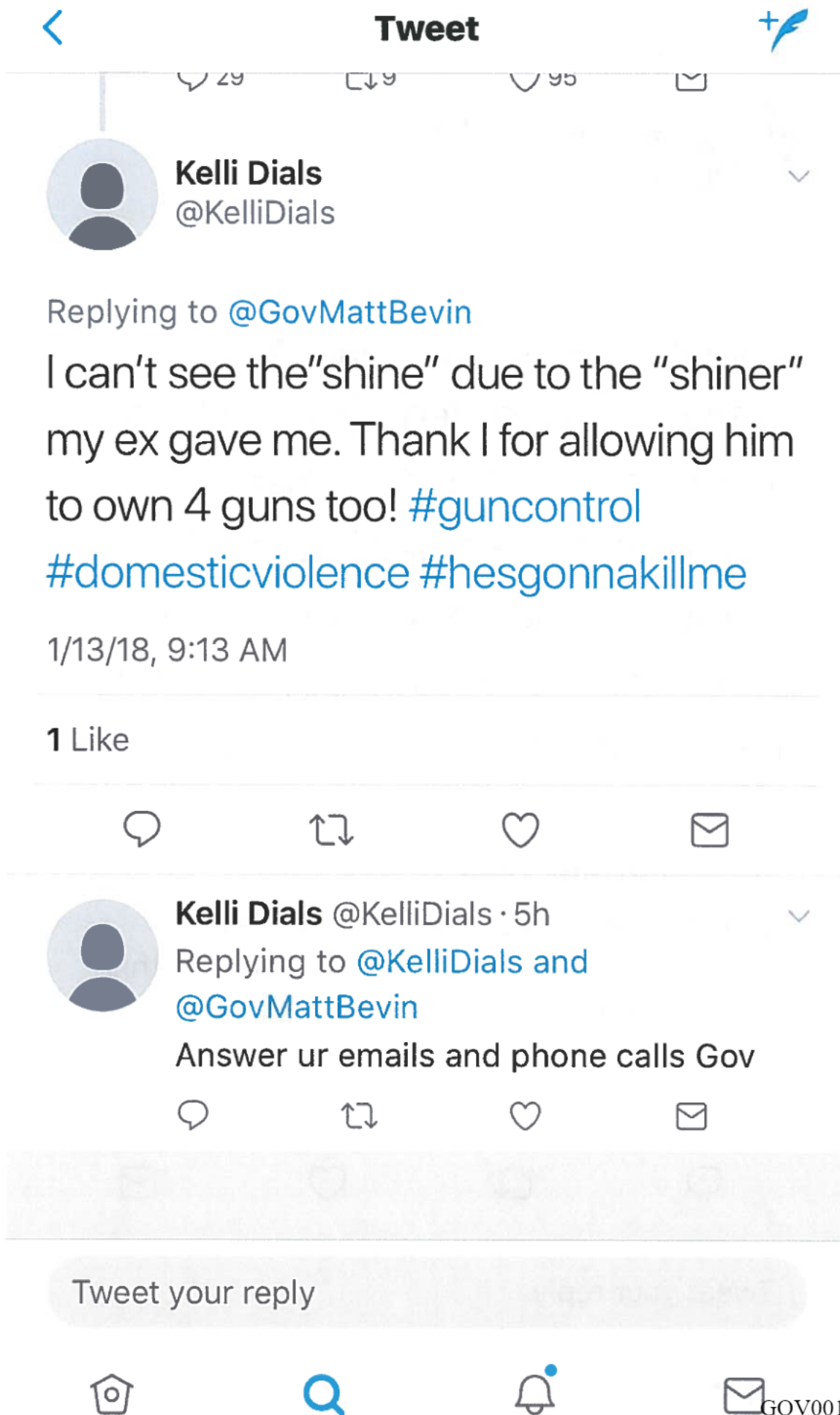












911100A05

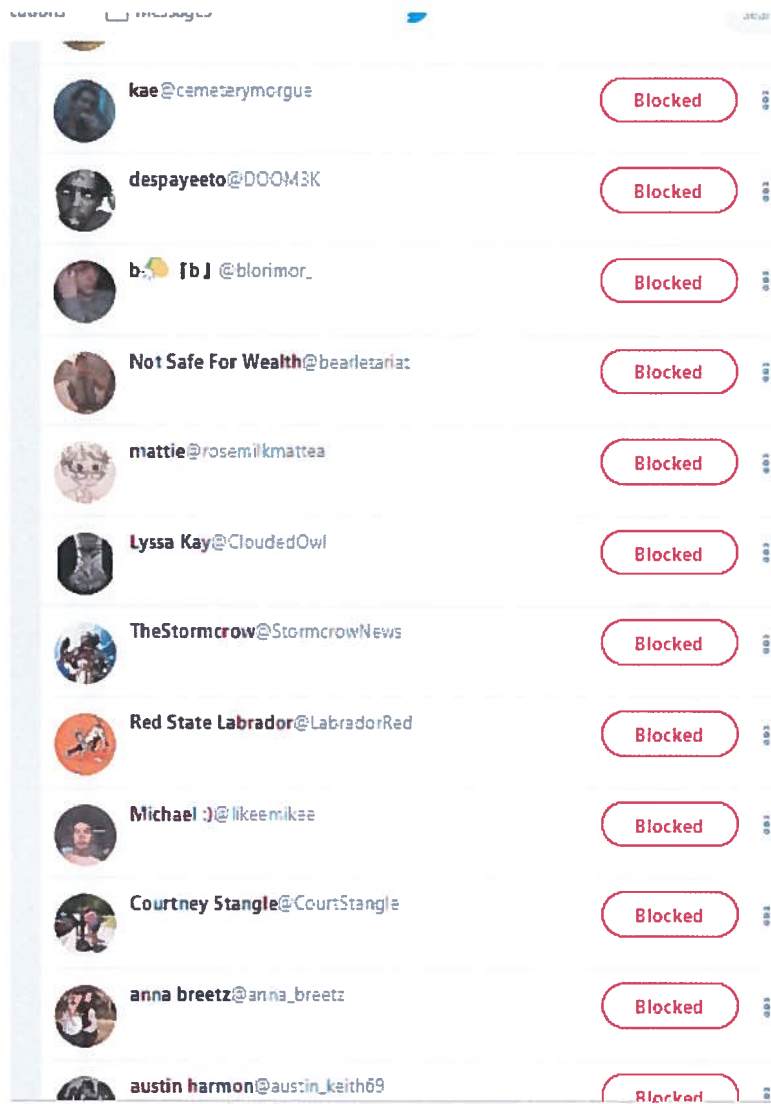















Lana Fugate Moore No way he will ever be re elected and all those who hang with him either. He didn't cause the pension crisis but he's willing to cut our throats to as he says fix it. Let him have it now cause he will never be back on top in Ky. I'm ashamed I voted for him

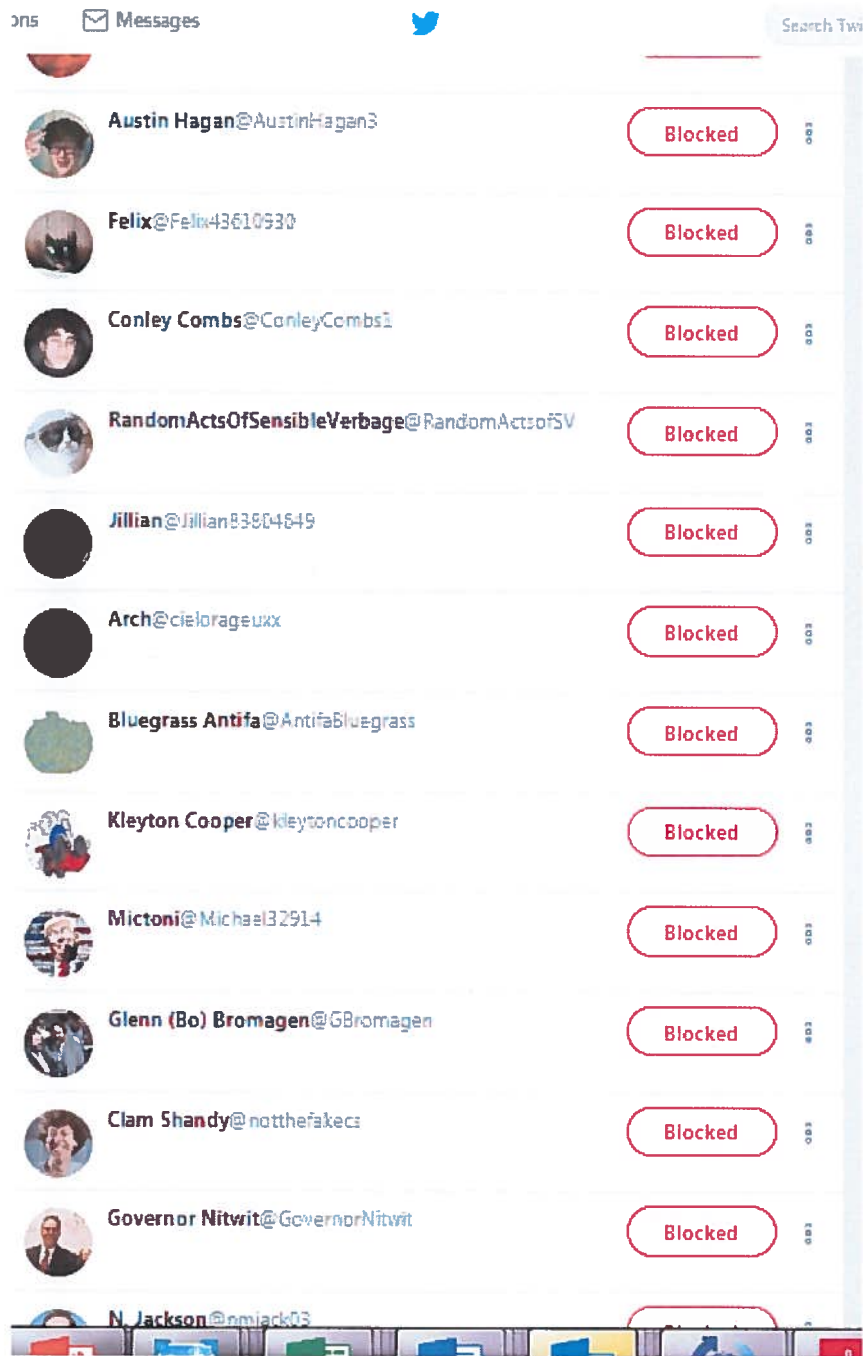
Like · Reply · Message ·  1 · 8 hrs

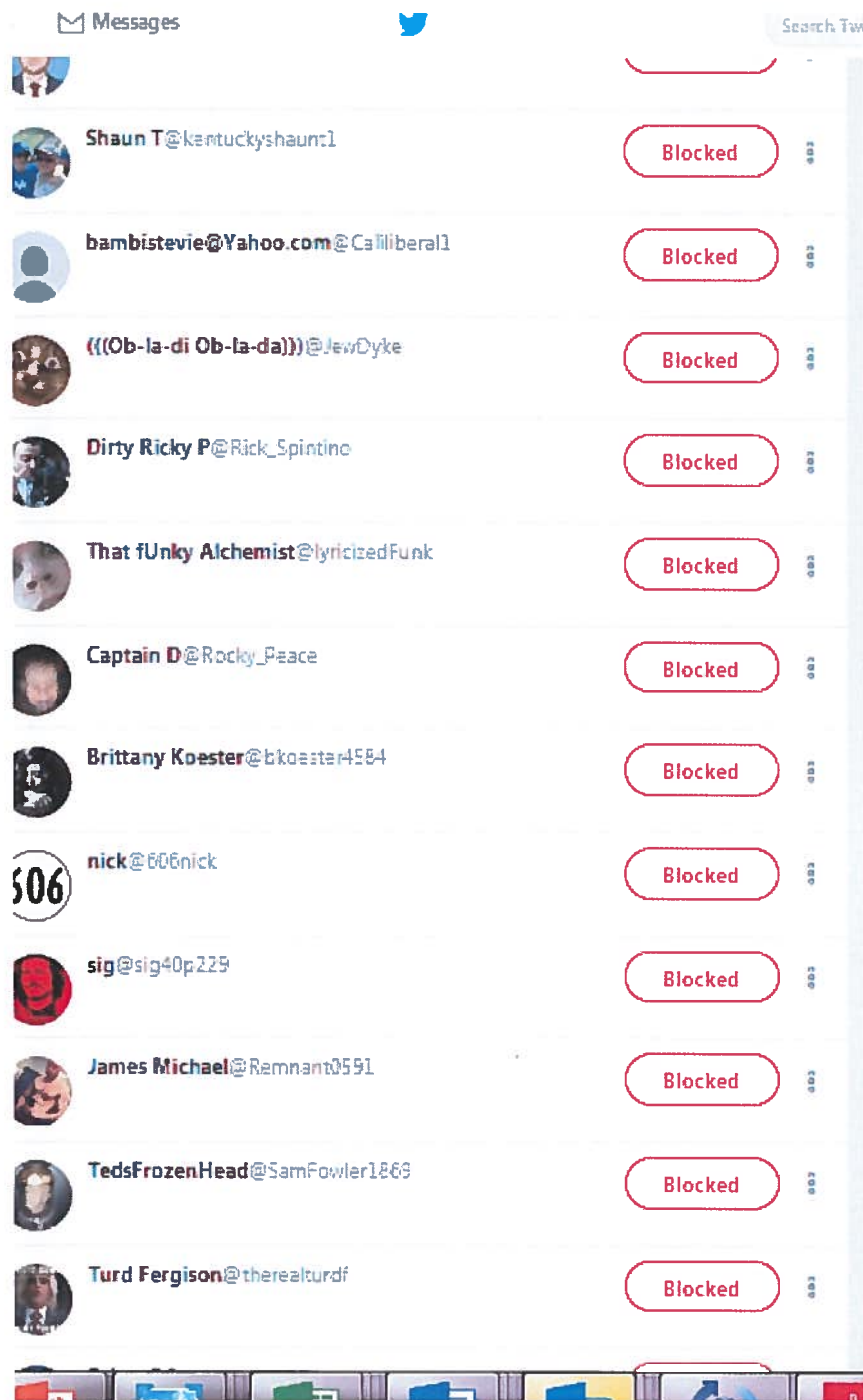















All / Imported		Advanced options ▾	
	Andrew C Weeks@Att_Weeks	Blocked	403
	Thicc Tim@serathelady	Blocked	403
	Mike Oksmills@wildcatlover70	Blocked	403
	Carol Lynne@steelers1828	Blocked	353
	Cheyenne Gwilt@Chyfly	Blocked	403
	Lock Individual-1 UP!@im_Awesome57	Blocked	353
	anette@axxette_	Blocked	353
	Author Gerry Dorsey@Gerry_Dorsey_	Blocked	403
	Lauren Reesor@LReesor	Blocked	403
	Jackson Minyard@jac_sonm	Blocked	88



























	@lichfaery@KvitMaya	Blocked	4/29/19
	2 DAYS TIL SALLY WALKER @_thagoldengay_	Blocked	4/29/19
	Mr. Benis@PizzaxSlutx	Blocked	4/29/19
	Daddy Logan@DaddyLogan9	Blocked	4/29/19
	Sean O@Pate506	Blocked	4/29/19
	bhald bhabbie@sharkmomma69	Blocked	4/29/19
	Emily Taylor Bruce@emilytaylorzaam	Blocked	4/29/19
	mk@TheRealMkx	Blocked	4/29/19
	Shaunny@Shaunny_Tpre	Blocked	4/29/19
	Absolve Me of my Sins@PocketVolcano	Blocked	4/29/19
	Dick DaVille@DavilleDick	Blocked	4/29/19
	Chris@Chris82494355	Blocked	4/29/19
	デモンスメキノブルム@seeuasadove	Blocked	4/29/19

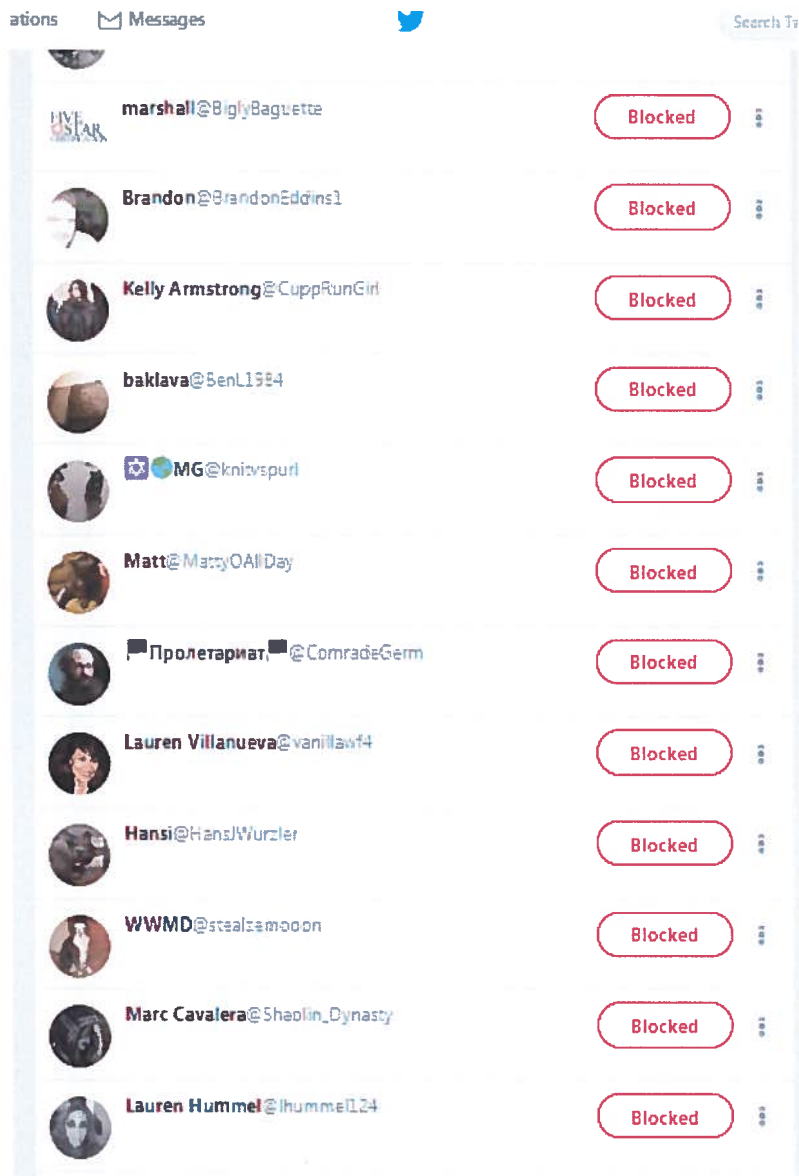


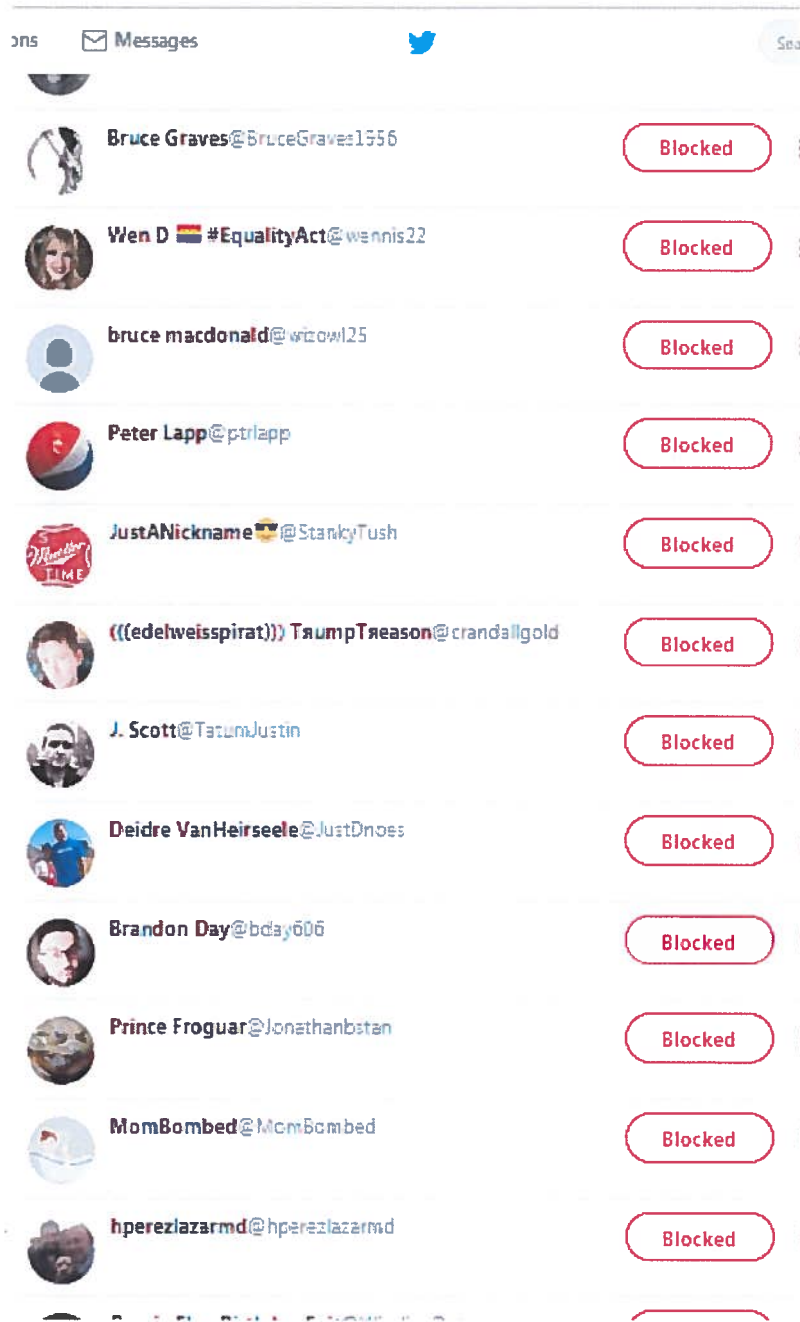















	Falcor@Falcor	Blocked	6/25
	2020 is coming @snowfien340	Blocked	2/22
	Larry Gardner@lwgardner82	Blocked	2/20/1
	FRANK FUEGO@jokemanccmeth	Blocked	6/25
	lisastark35@lisastark351	Blocked	4/25
	Jon Michael@jnnzal	Blocked	6/23
	Spencer Franzoi@SAFETYSPANCER	Blocked	3/23
	Ω Political_Ronin Ω @Old_Gray_Ronin	Blocked	6/21
	actioncookbook@actioncookbook	Blocked	4/23
	Spenser Smith@SpenserSm1th	Blocked	4/23
	Ellie @HiSPrints@hiSprints	Blocked	2/21
	Britton Richardson@DasBritton	Blocked	4/23
	Nicole Cuturia @NicoleCuturia	Blocked	6/23








	Collin @classicalzax	Blocked	283
	keashia @killjoykea	Blocked	483
	uh august @leftistcannibal	Blocked	403
	jc @Wockia_Foot	Blocked	483
	Dave @MakeuponthaMind	Blocked	483
	amanda @amandagburks	Blocked	483
	Jeri @j3rimari3	Blocked	603
	BDubb @bdubb475	Blocked	383
	lk @kellerlauren	Blocked	423
	Sam Hicks-Ross @samtherosscat	Blocked	583
	McKenna Memes @dundum54	Blocked	503
	David Mills @KarlFisherloser	Blocked	383


	Greg Johnston@GJohnston	Blocked	001
	Aalvey9@Aalvey93	Blocked	001
	Saint Jimi aka Lamont Sanford@SaintJimiC	Blocked	001
	Jickfoo@jickfoo	Blocked	001
	Not Today@ohdamn1581	Blocked	001
	LM Hydrogen@ChuckGore2	Blocked	001
	Mickey4Hundred@MickeyL1C4	Blocked	001
	Spictacular1@Tcm58625338	Blocked	001
	BeardedOutlaw@JamesOpieLiving	Blocked	001
	Drew@drewsclace	Blocked	001
	Bavlook@bavlook	Blocked	001
	Gary Bentley@garybbentley	Blocked	001












































	
 Bernie Flag Birthday Suit @WindingDot	Blocked
 Cait 🌿 🗡️ @FearlessCait	Blocked
 illuminatiguatti @kenny00751166	Blocked
 Skin Splash @SplashSkin	Blocked
 Bignutking420 @bignutking420	Blocked
 Dillon @smoking_mid	Blocked
 Jaclyn @JBella513	Blocked
 Blake Drew @BlakeDrew6	Blocked
 Amandine Glucky @glucky_amandine	Blocked
 ChuckieCheezy @CheezyChuckie	Blocked
 Carpe Nutella @CarpeNutella	Blocked
 Smh @FishGritsGod	Blocked


	Khostamusic @khostamusic	Blocked	003
	Leslie.Omohundro @LeslieOmohundro	Blocked	003
	The One True King! @thatguyyaknow	Blocked	003
	Stacy Fort ;@StacyFort	Blocked	003
	Neil 🇺🇸@basementvegan	Blocked	003
	Uncle Bobby B Baby @12bobbyboucher	Blocked	003
	Debi Sharp @DebiSharp5	Blocked	003
	Brent whitt @Brentwhitt2	Blocked	003
	Michael Weatherington 📞@Michael82256530	Blocked	003
	mmpetegrew @mmpetegrew	Blocked	003
	Jaime Ward @squasak_inc	Blocked	003
	Chuck @capt_hoho	Blocked	003













ifications Messages  Search

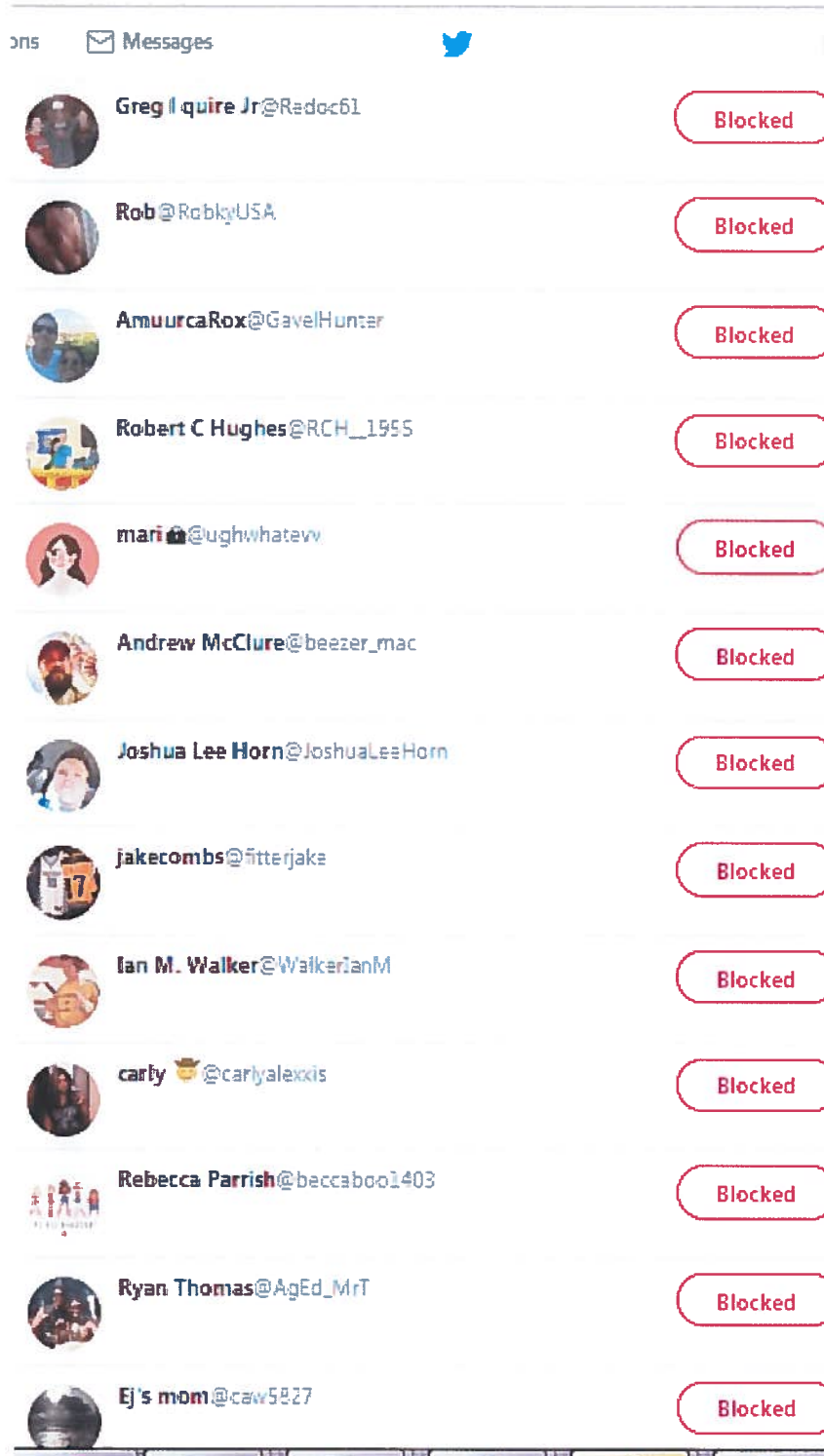
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	Reba @zeccabeller	Blocked	003
	Cheryl Daniel 👤@cheryldaniel41	Blocked	403
	i bless the rains down in Castamere @Chinchilla311a	Blocked	401
	David Coyle @dcoyle11	Blocked	003
	Brian Cuddleston @BrianCuddleston	Blocked	403
	iLLiAM @ILLWILLTHEMICK	Blocked	404
	Phil Van Kampen @PhilVanKampen	Blocked	001
	Kerry On Anon @MrIndigo_	Blocked	003
	Easy Stache Rider @easystacherider	Blocked	003
	Special Agent Utah @PonceDeNeon404	Blocked	003
	William Bienes @wimbienes	Blocked	001













		
	Suckerforcats@suckerforcats	Blocked
	Cape'd into retirement@BigRedInsights	Blocked
	Cincy Group Therapy@CincyTherapy	Blocked
	gman197p@gman19720	Blocked
	Josie@josiefitde	Blocked
	Cheyenne Harper@cheyenneharpe16	Blocked
	tyler@bernforbowie	Blocked
	David@dvdbrt	Blocked
	Purple Haired MAJOR NATIONAL EME AGENCY @KrisisPi...	Blocked
	Bob Cunningham@BCunningham215	Blocked
	Larry Recob@LarryCob37	Blocked
	Undeclared Wheat @FDBort	Blocked
	Hesiod Theogeny@Hesiod2k11	Blocked

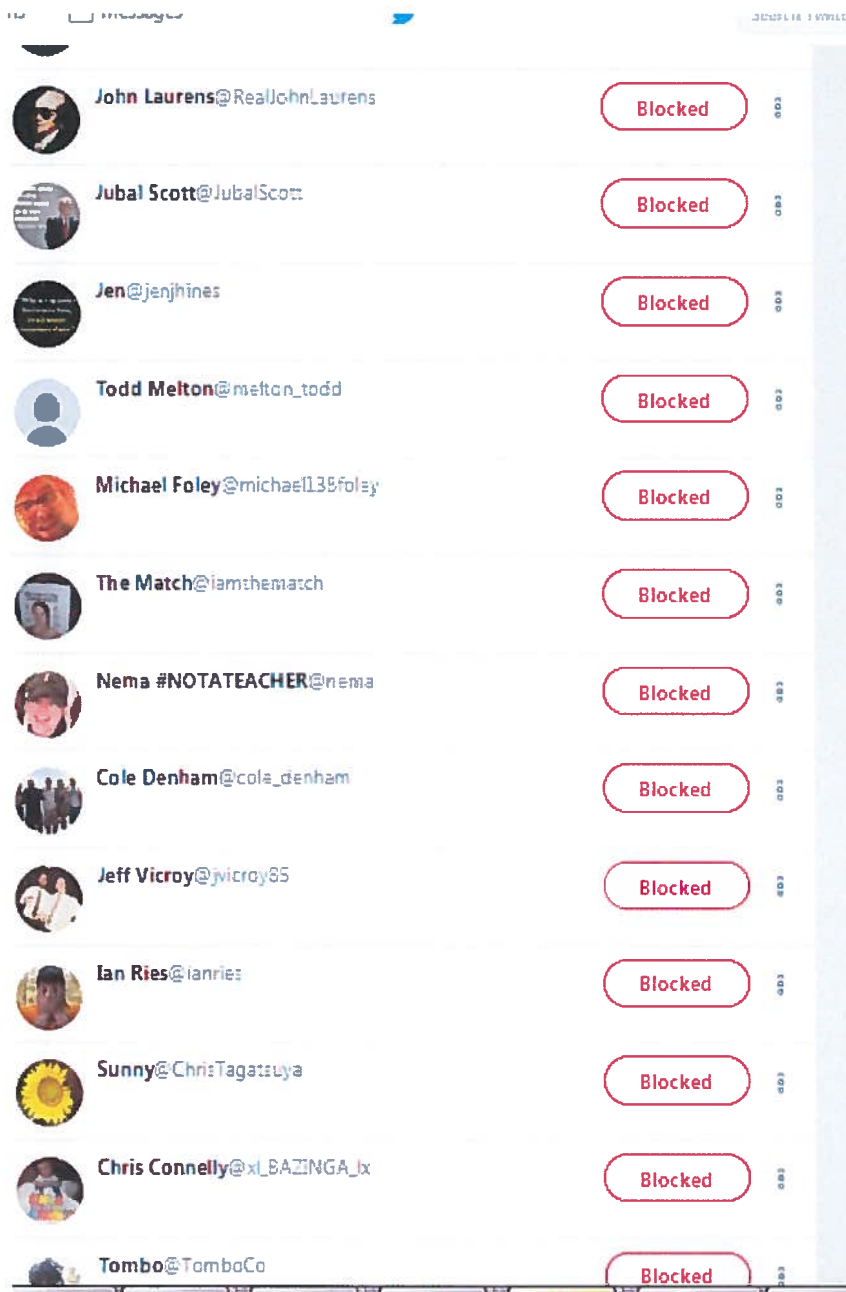
		
	Notgoing Totellyou @M5B1tch	Blocked
	Stude @stu_alt	Blocked
	Duane Smith @dasdrums	Blocked
	Dennis the Menace @Yourdrivebi	Blocked
	YesM5G42 @yeismsg	Blocked
	CheekyChicken @ChopMyChicken	Blocked
	danzig138 @danzig138	Blocked
	towgr @towgr	Blocked
	Witty User Name @fsfwanna be	Blocked
	AC @_cDcVa_	Blocked
	henry @HenryFissel	Blocked
	Honey Bear @biff_mcbiffers	Blocked

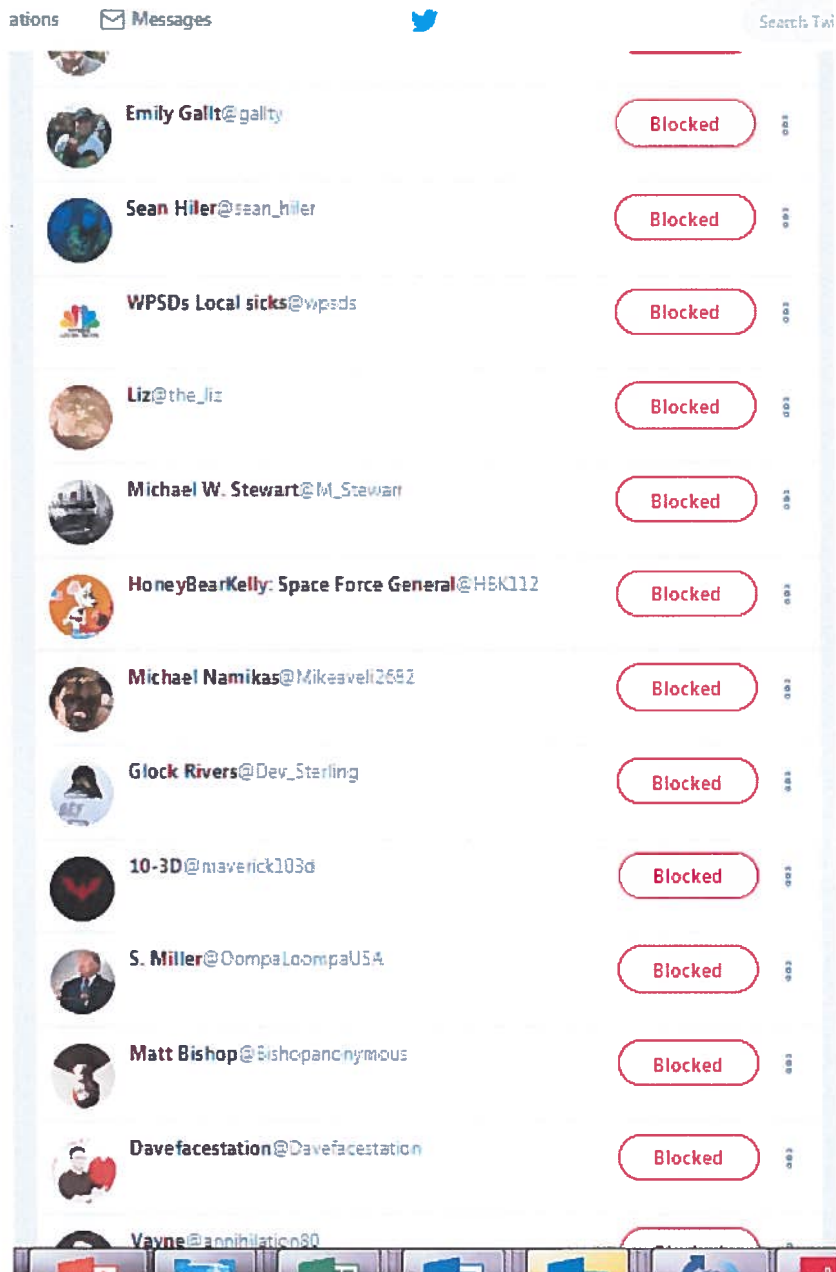
ons Messages  Search

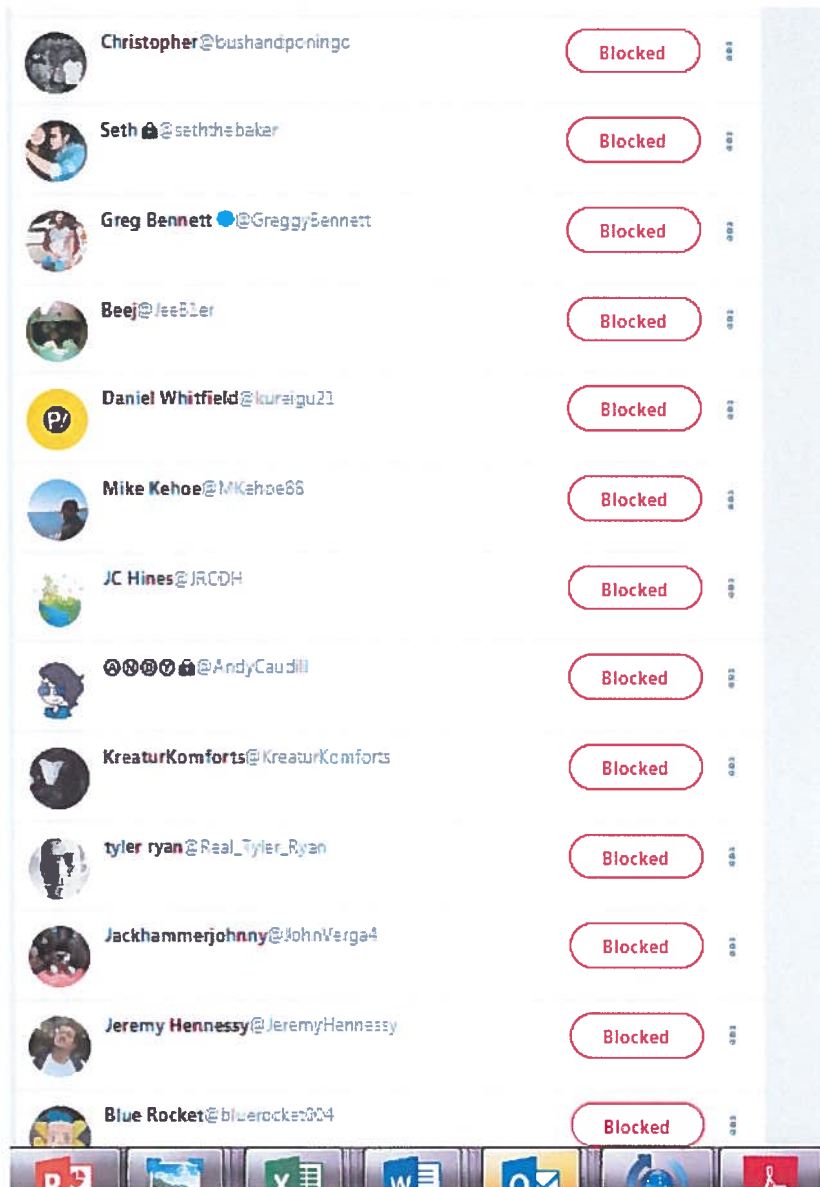
	Tony Clifton @bradyboy99	Blocked
	Lady Norse @April_Keil	Blocked
	Doug Withjelm @DougWithjelm	Blocked
	everybodylovesramen @therealsalesguy	Blocked
	Debonaire Hustler @DebonairHustler	Blocked
	Kimberly @kann96	Blocked
	T. @TTruth22	Blocked
	Evan Skaggs @gentlegiant:45	Blocked
	Lex Hendrix @itslexhendrix	Blocked
	superethanrctank75 @superlegoethx75	Blocked
	doebop @doebop	Blocked
	Bob @kdmutt	Blocked

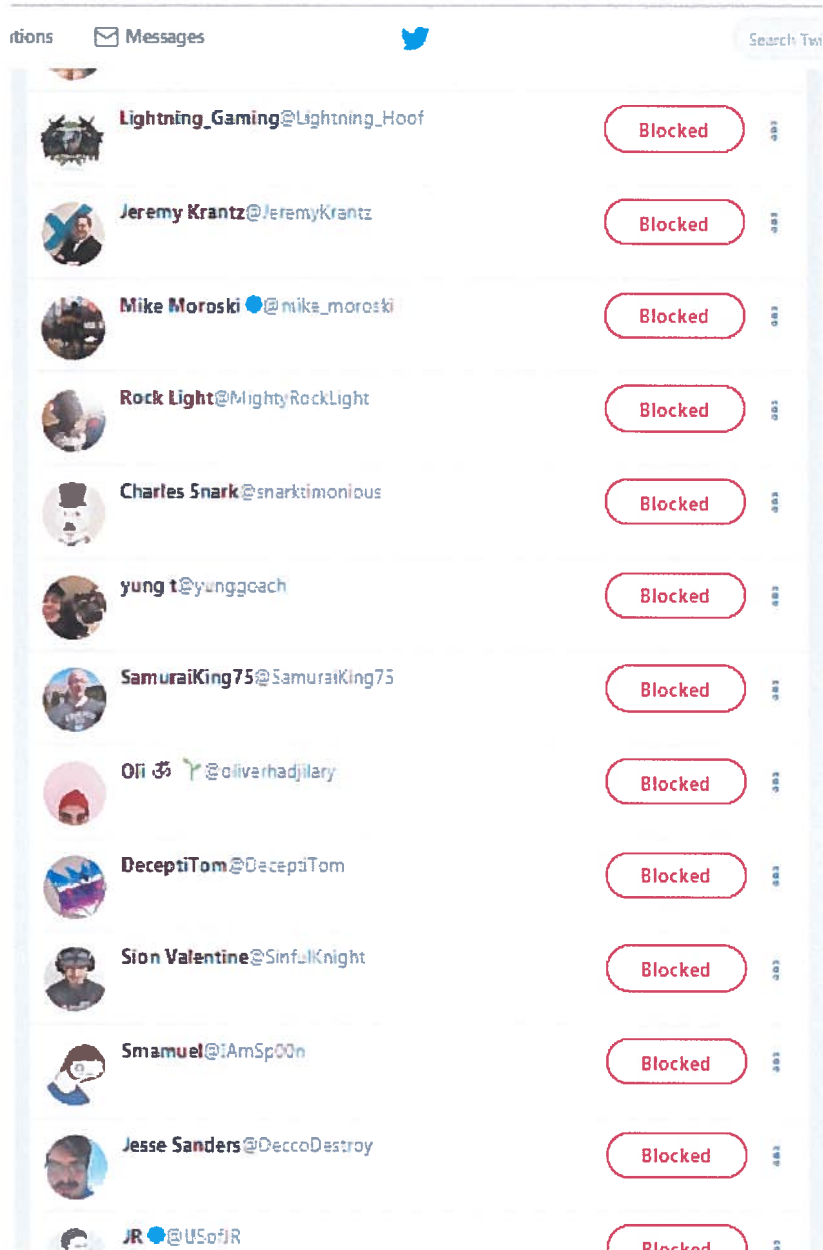



	Machala@Ma_Calla	Blocked
	Jimmy Cline@cass35	Blocked
	rhino on a treadmill@fastEDDIESon	Blocked
	briana cook@Miss_BriBrii	Blocked
	Wildcat Friend@SAECATFAN	Blocked
	Brandon West@bwest1234	Blocked
	Keith Jones@tigerfbal173	Blocked
	Jason Ence@jasonuk17	Blocked
	Jeffrey Burton@jeffiyandleeny	Blocked
	Logan Michael Smith@Logan_Smith17	Blocked
	David Lee@DTackettjr13	Blocked
	Matthew Hensley@matthewhensleyy	Blocked
	DeSean Patterson@Diamonte5	Blocked




































ions Messages  Search


	JR @USofJR	Blocked	003
	TotalBiscuit @Totalbiscuit	Blocked	003
	Sass & Resist @ResistSass	Blocked	003
	Loren Berzsenyi (KY resident blocked by Gov Bevin) @underdo...	Blocked	003
	Nathan @wnathans	Blocked	003
	Angie @RubyGirl28	Blocked	003
	Nathaniel Blaine @NathanielBlaine	Blocked	003
	Richard Gillam @RichardGillam7	Blocked	003
	Hot Lib @AhemLib	Blocked	003
	#BUTINBOTS: 1st. AMENDMENT @RodneyRhodan	Blocked	003
	Scott @DetroitFivesOh	Blocked	003
	Brian Fever @Dr_Brian_Fever	Blocked	003
	Joanne @joannecar	Blocked	003


Messages			Se
	Johnny Angel@cataboutdown1	Blocked	
	Sodexo Dishwasher@SodexoDishwashr	Blocked	
	Seth Weitz@sethaweitz	Blocked	
	Grumpy Doc@GrumpyDoc77	Blocked	
	WhenRightsWrong@Right_All_Wrong	Blocked	
	Matthew SNOWFLAKE ❄️ AF@mshalk	Blocked	
	(((francis)))@theTFrancis	Blocked	
	Taylor Henry@itstaylorhenry	Blocked	
	David O'Halloran 🇺🇸🇬🇧@DavidOH2577	Blocked	
	Irger@irgerburger	Blocked	
	Grady Peoples III@A_GlobalCitizen	Blocked	
	Todd Melton@ToddMelton4	Blocked	
	Resista-It'sNotOverYet-Sista@debiowens	Blocked	


itions Messages





 Rob M @robdotcom71 Blocked


 Brn2RunGirl 🇺🇸🇬🇧🇫🇷 @TeaRocckanova Blocked


 Bruce 🇺🇸 @bruce_caruso Blocked


 VonBoski @vonboski Blocked


 bombe @Davidxgr Blocked


 David @spyke143 Blocked


 Raymond Santos @raymondusantos Blocked

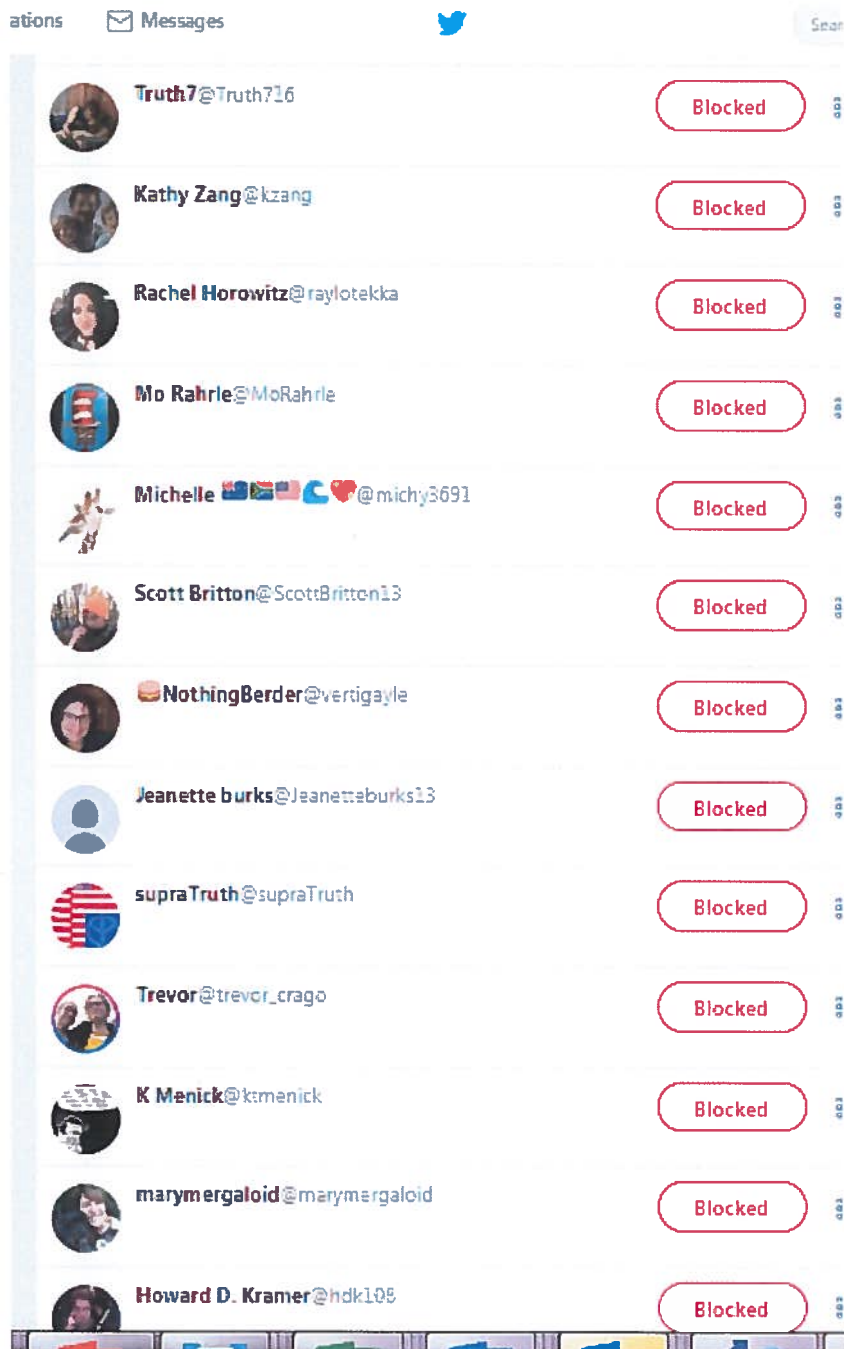
 JP Moatti @JPMoatti Blocked

 Kurt Michael Friese @KurtMFriese Blocked

 Kate Squillz @nyladawg Blocked

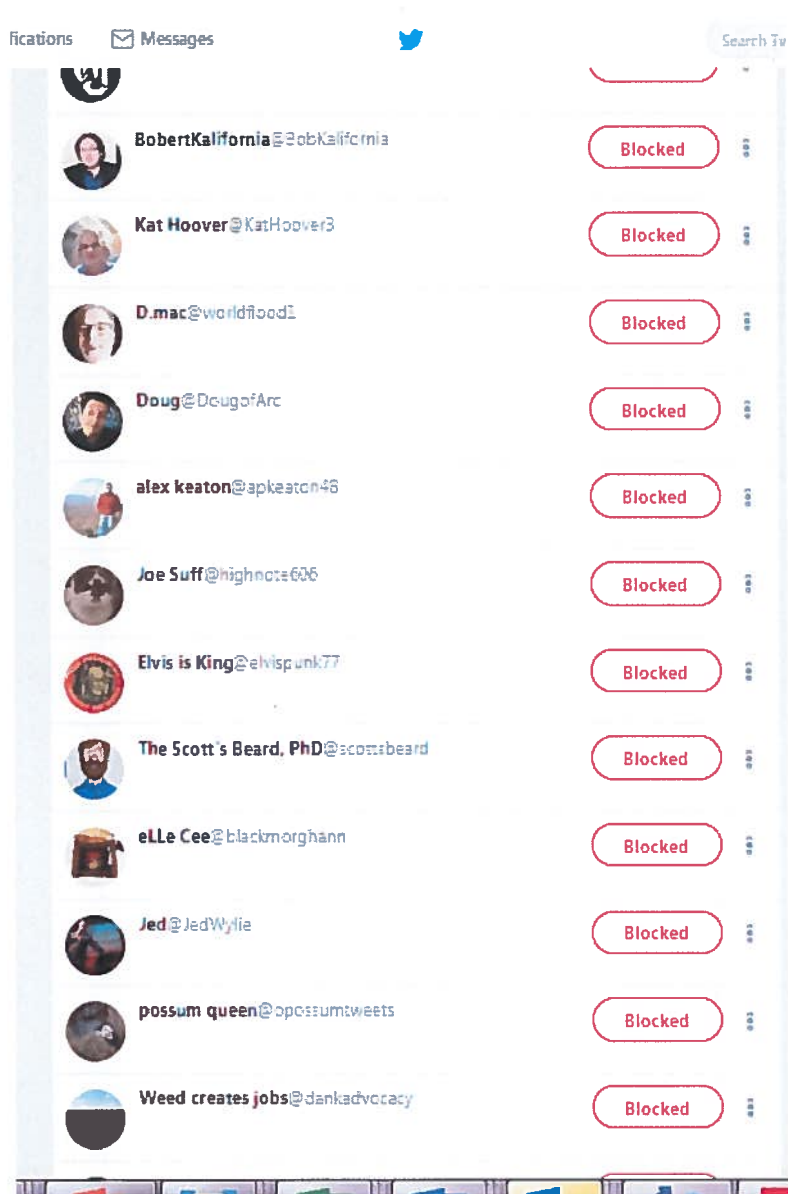
 Karen @hwyhana Blocked

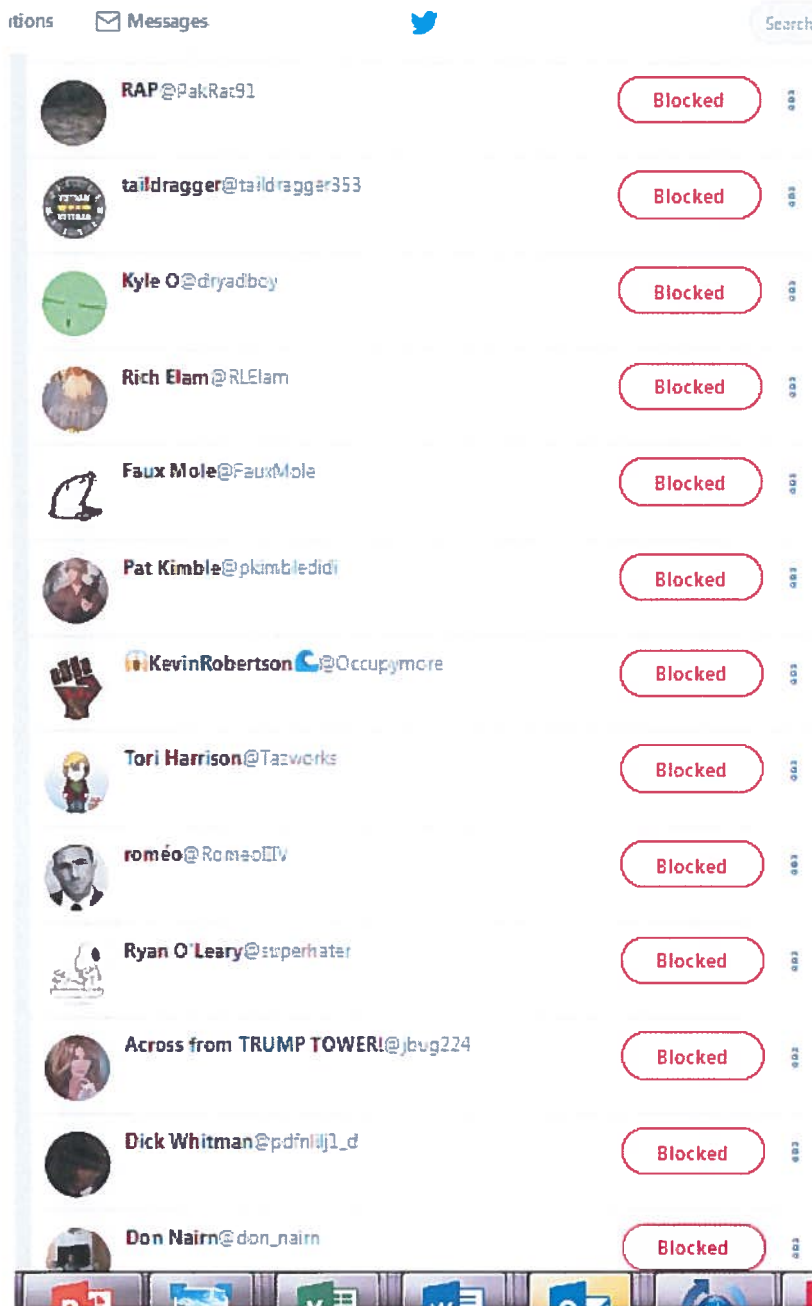
 Dennis @DignanRevenge Blocked

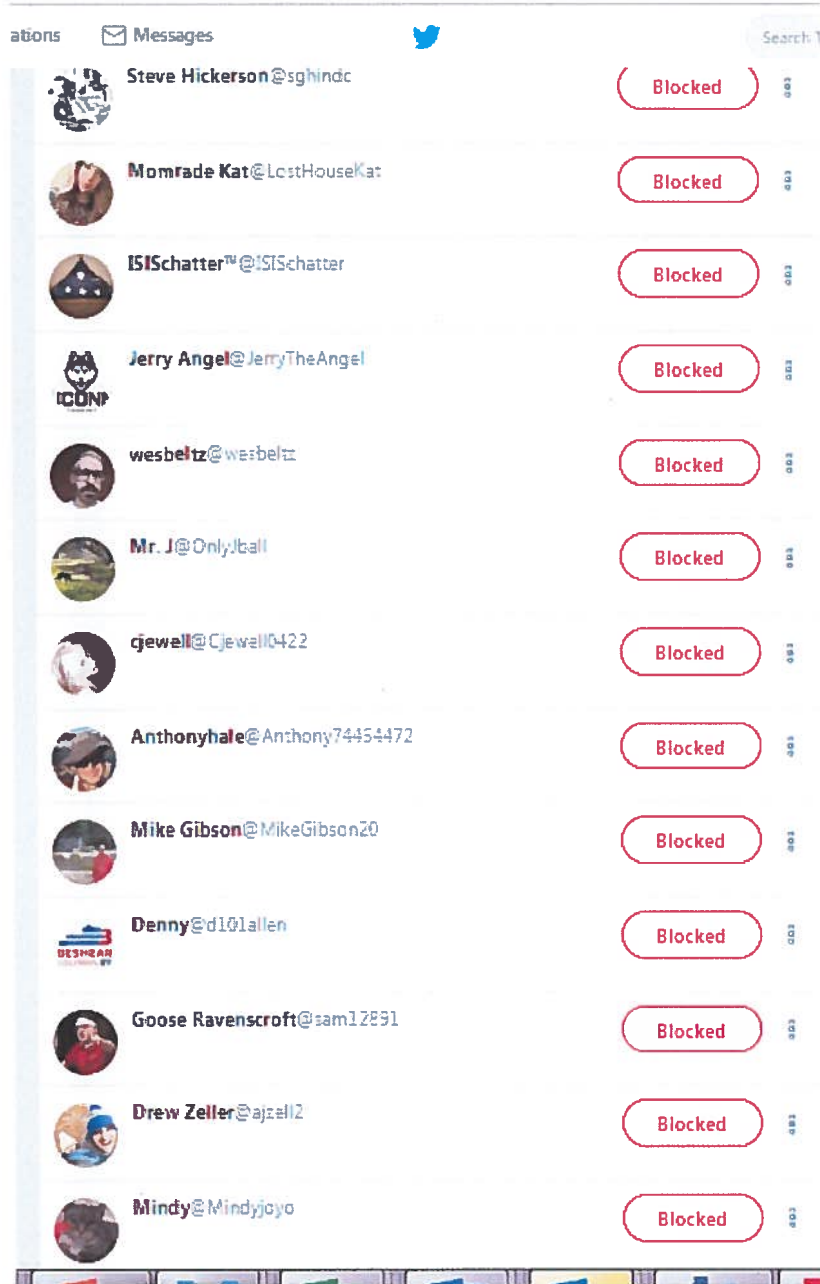


	You may call me V @RayMartinez009	Blocked
	Tracey Strader @TraceyWitt64	Blocked
	TrudyLeBeau   @TrudyLeBeau	Blocked
	Mr.KFC  @_MaliKtoocoLD_	Blocked
	Wyattgrrl @lamermad	Blocked
	deb mcLeod @debmcLeod13	Blocked
	Moozhan Toofan @MoozhanT	Blocked
	Flockchain @flocktard	Blocked
	Edan Clay  @EdanClay	Blocked
	  RNCat    @RNCat50	Blocked
	ReaperKat   @ReaperKat	Blocked
	Cheryl @Cheryl07082904	Blocked
	Tim O. Nowland @ONowland	Blocked























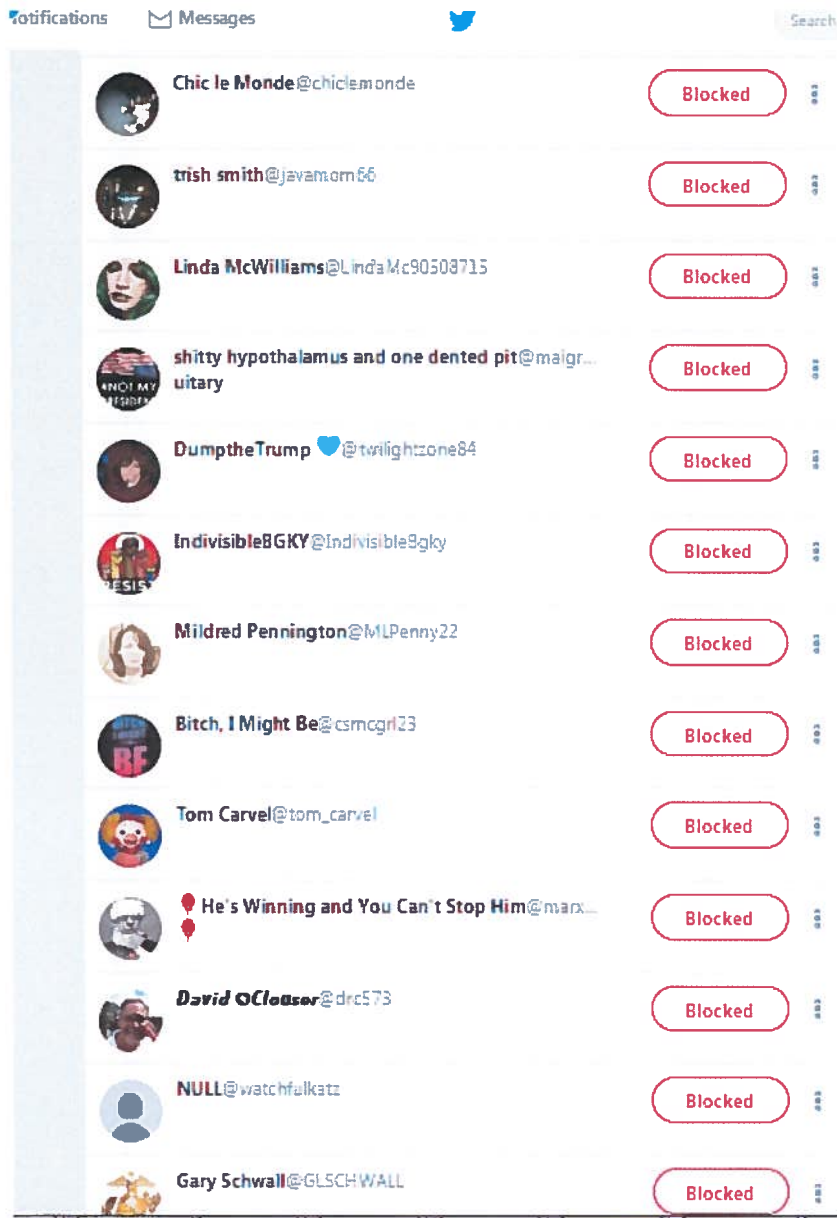
ons














Messages

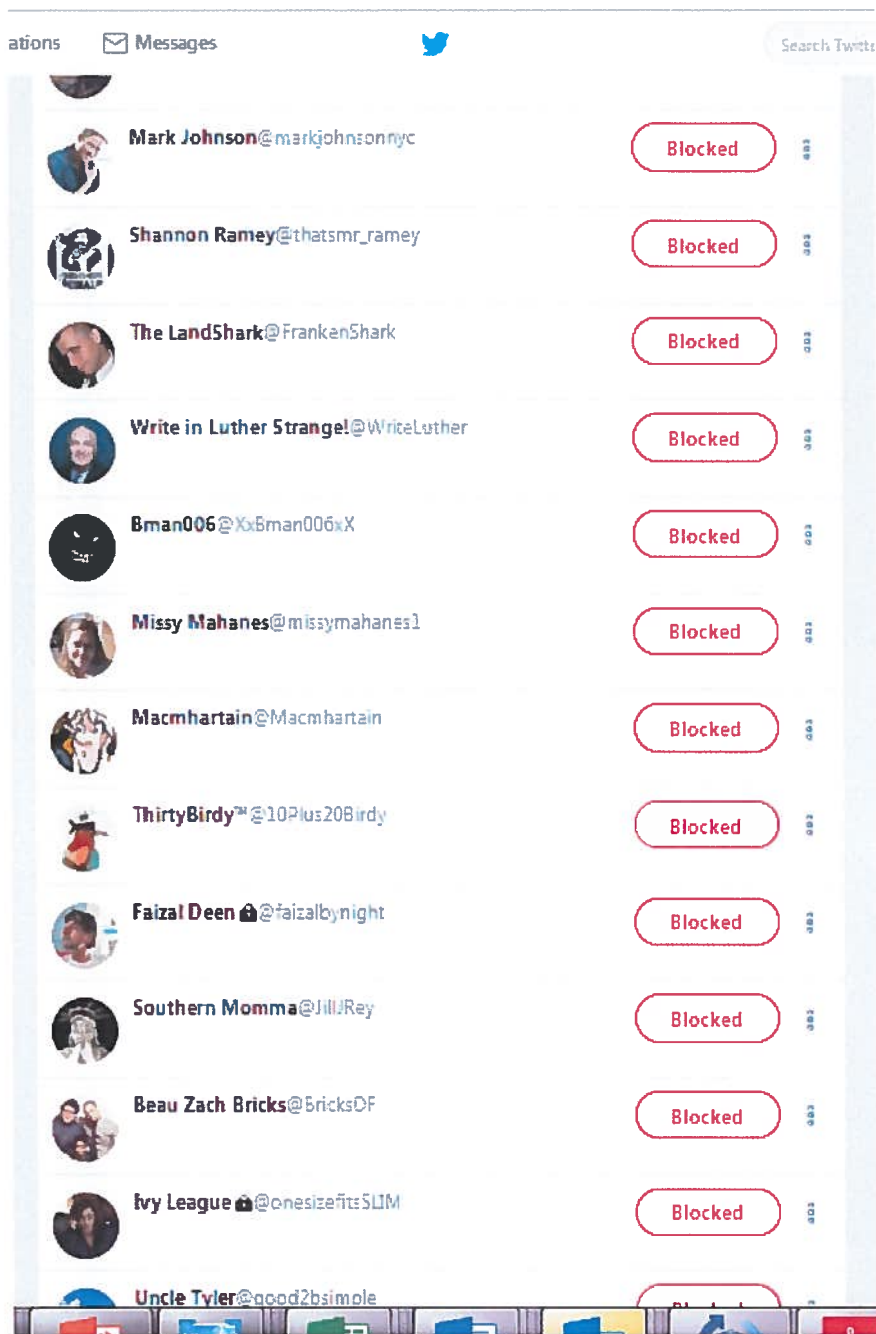
Search


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	Tears of Scrutiny @Noiselaw	Blocked	002
	Devilish Ledoux @Devilishlydc	Blocked	003
	Moonbeam @moonbeamstar12	Blocked	002
	Matt Nicholas @mattnicholas	Blocked	002
	Honest American @HonestAmerican_	Blocked	003
	horny mommy @mommy_horny	Blocked	002
	Angela Arnold Thomas @Angeladammit	Blocked	002
	Rick Whelan @rick_whelan	Blocked	001
	Jeremy Lewis @JELewis35	Blocked	002
	josh @TightButtons	Blocked	003
	cb40burger @cb40burger	Blocked	002
	Rick @rickc59	Blocked	001







	Tia @DERBYCITYGIRL	Blocked	001
	jonalisa @jonalisa	Blocked	001
	Carrie Cross @carriecross1974	Blocked	001
	Bluthe @bluthe	Blocked	001
	Xavier Smith @SculfulBrotha	Blocked	001
	Stevie's 45s @stevies45s	Blocked	001
	Miri Boheme @MiriBohame	Blocked	001
	Melissa M. Howard @prinzonyx	Blocked	001
	Rapunzel @RapunzaH9	Blocked	001
	Barbara Kelley #SaveODAAT @bgkelley411	Blocked	001
	WL Weller @cardsfaninky	Blocked	001
	Bill H @grovergeeb	Blocked	001
	official james laureano @jamesmlaureano	Blocked	001




ons Messages 


EVERYDAY AMERICAN VETERAN'S WIFE @Tracy_5_We...


Blocked


Kelly @KellAF18


Blocked


Mark Barrette 🇨🇦 🇺🇸 @That_Dumb_Wall


Blocked


Ms. L'ville Belle @LaDeeDaKY


Blocked


BWills 🐦 @Billy_Pie5


Blocked


Rick Kelly @Rickkelly1


Blocked


Konadolomite @eliz_zah_beth


Blocked


Kacibelle @Kacibelle


Blocked


Lil Debbie @thru_passing


Blocked


Mo Rivera/Carol Danvers Stan @HerRoyalRedness

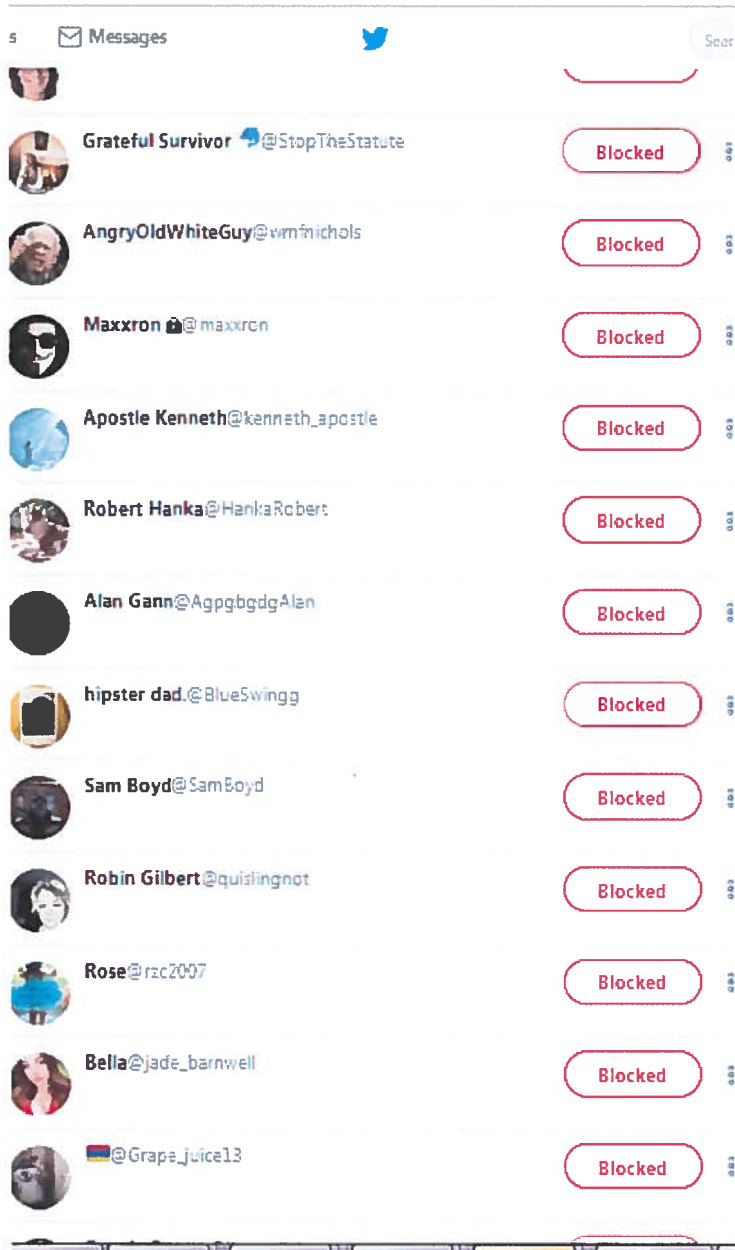
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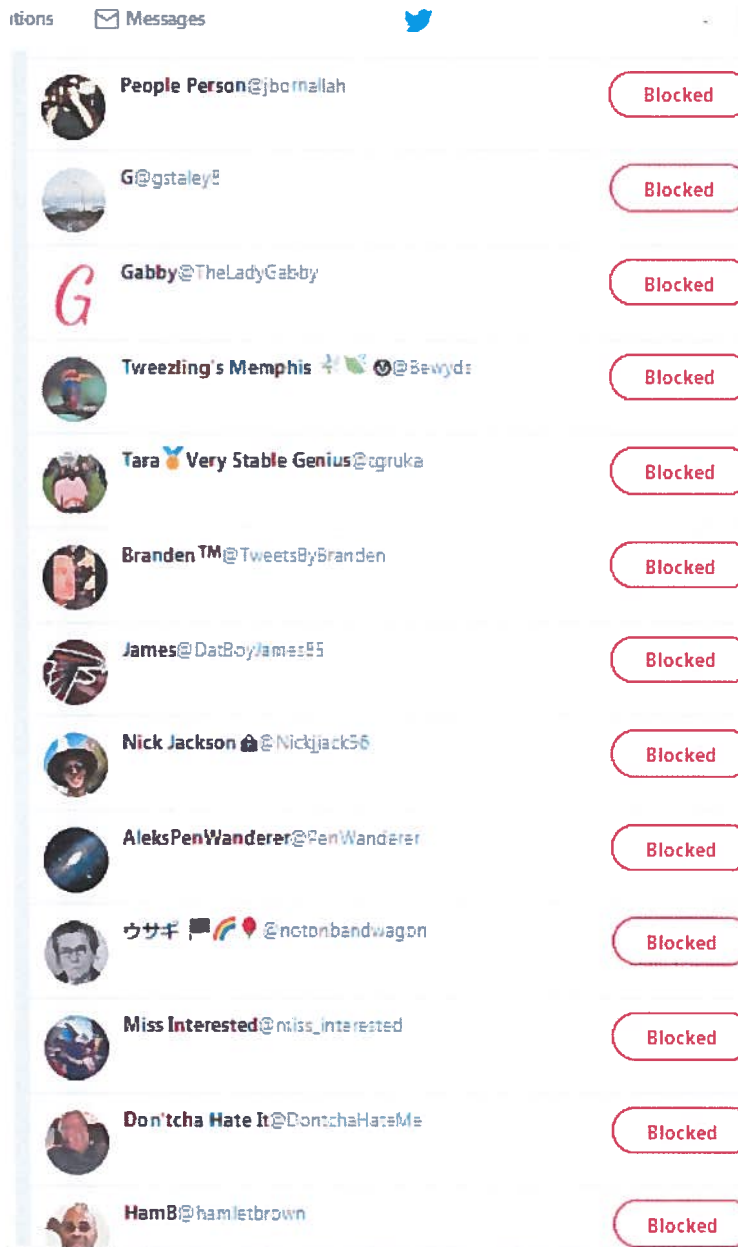

Matt C @mwicDallas

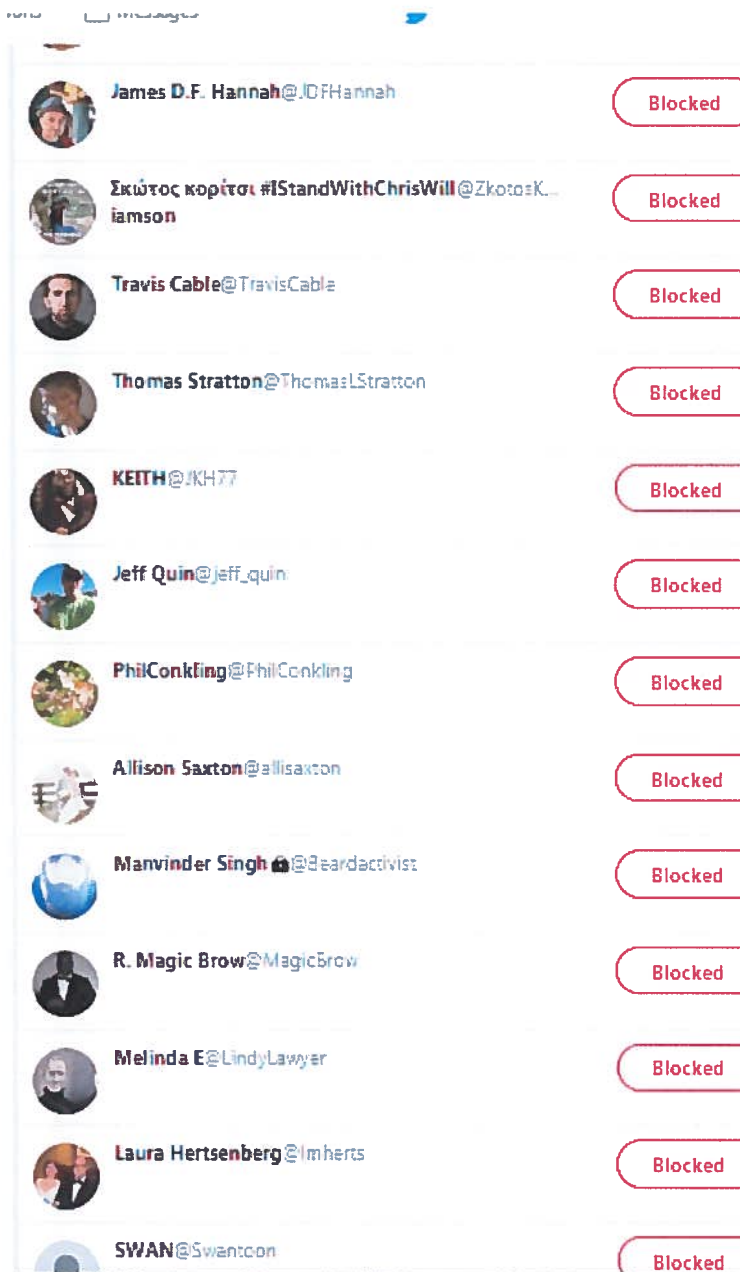
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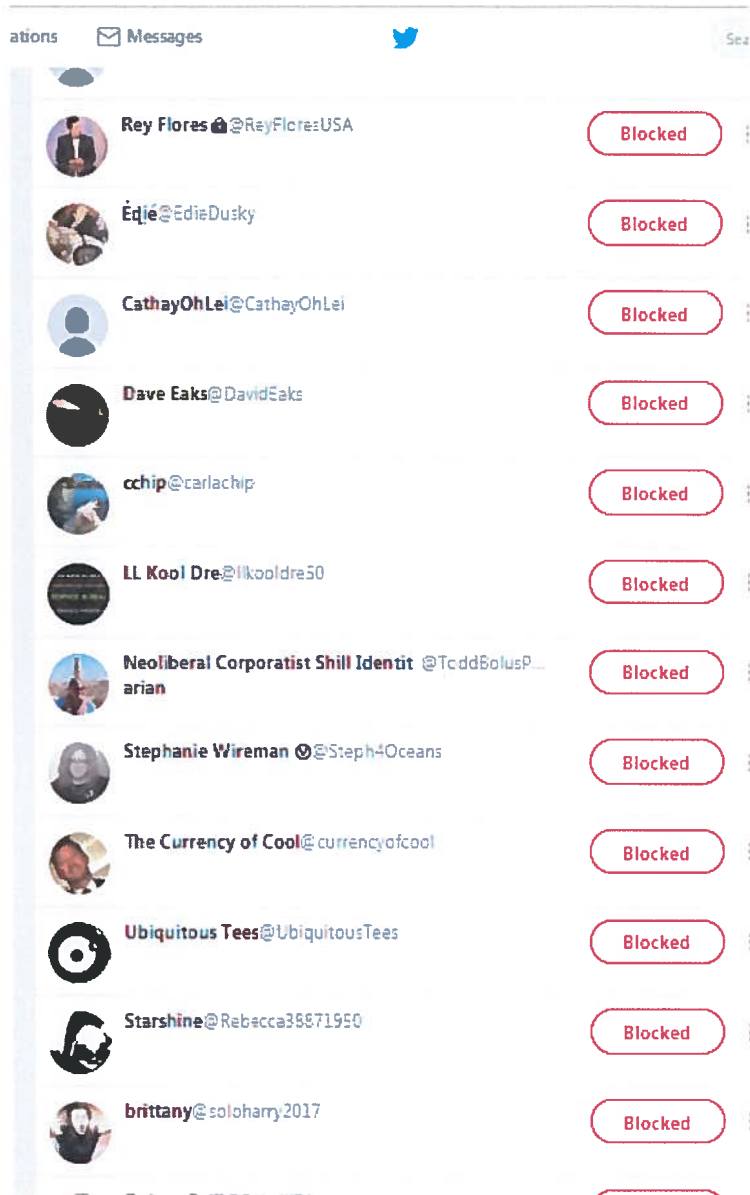

Jodi Jacobson 🐦 @jjacobson



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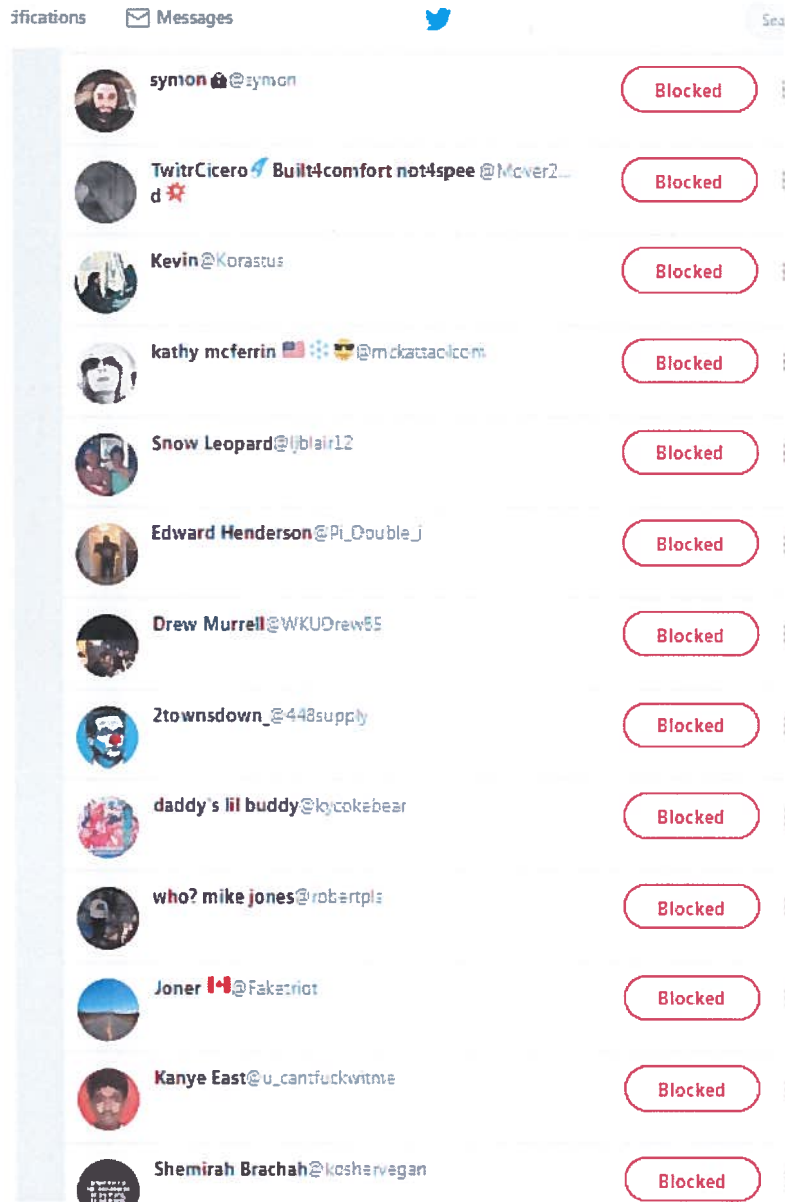




















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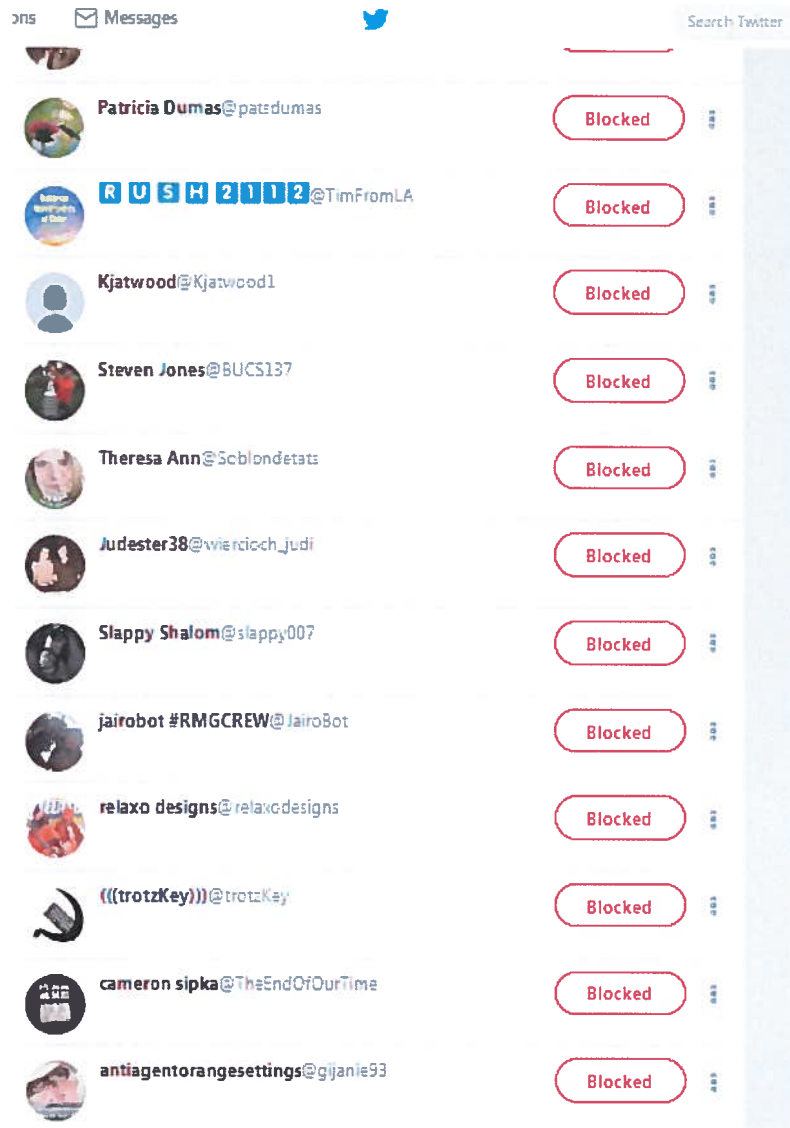
	Robert Balli @Raball174	Blocked
	Mike Crogan @mikecrogan	Blocked
	Ms. Swallow @mareswallow	Blocked
	lil homie gay ass  @fanny_blood	Blocked
	Brandy Hearn DeFalco  @defalcob	Blocked
	Chad Pearson @casinochad	Blocked
	 @GregoryFalcone	Blocked
	Joshua Hay @CMRiverCo	Blocked
	Elaine Matthew @undhockeyfan	Blocked
	lanorte1 @lanorte1	Blocked
	Bill Sinn @therealbillsinn	Blocked
	Rob Rowles   @RobertPRowles	Blocked
	Kinetic Meow @KineticMeow	Blocked

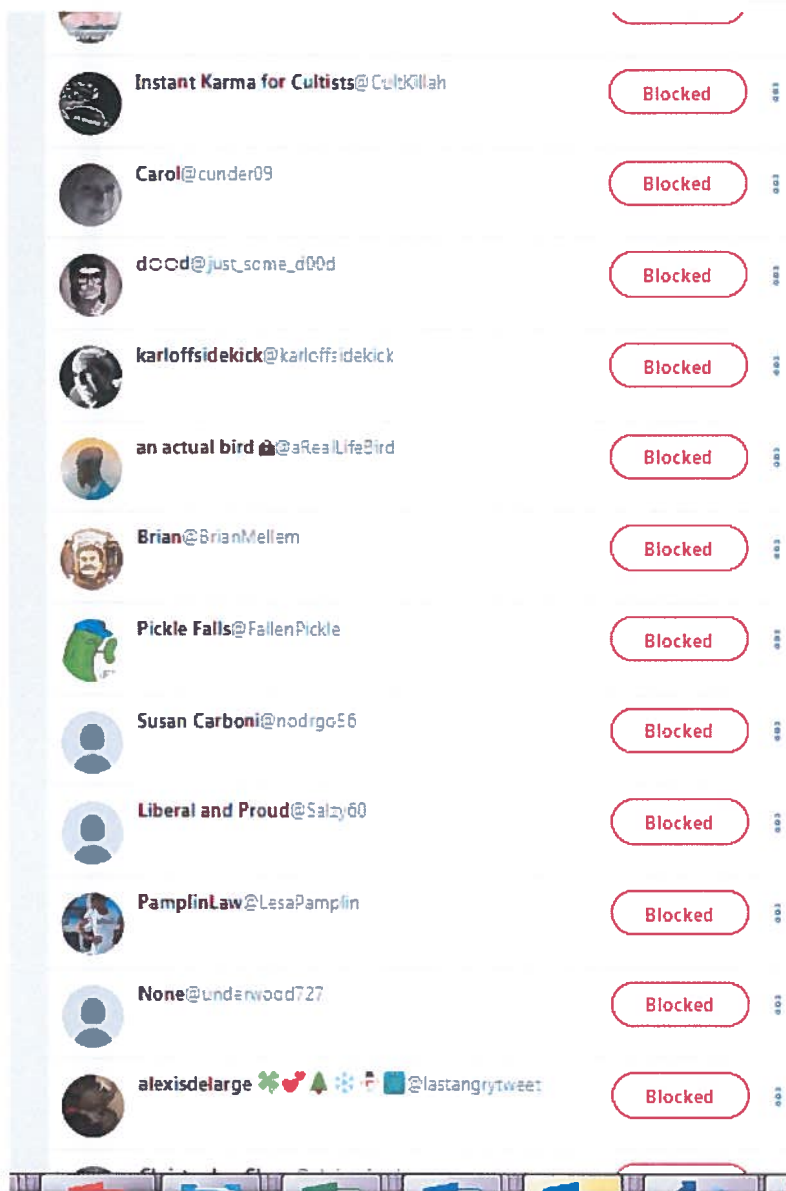


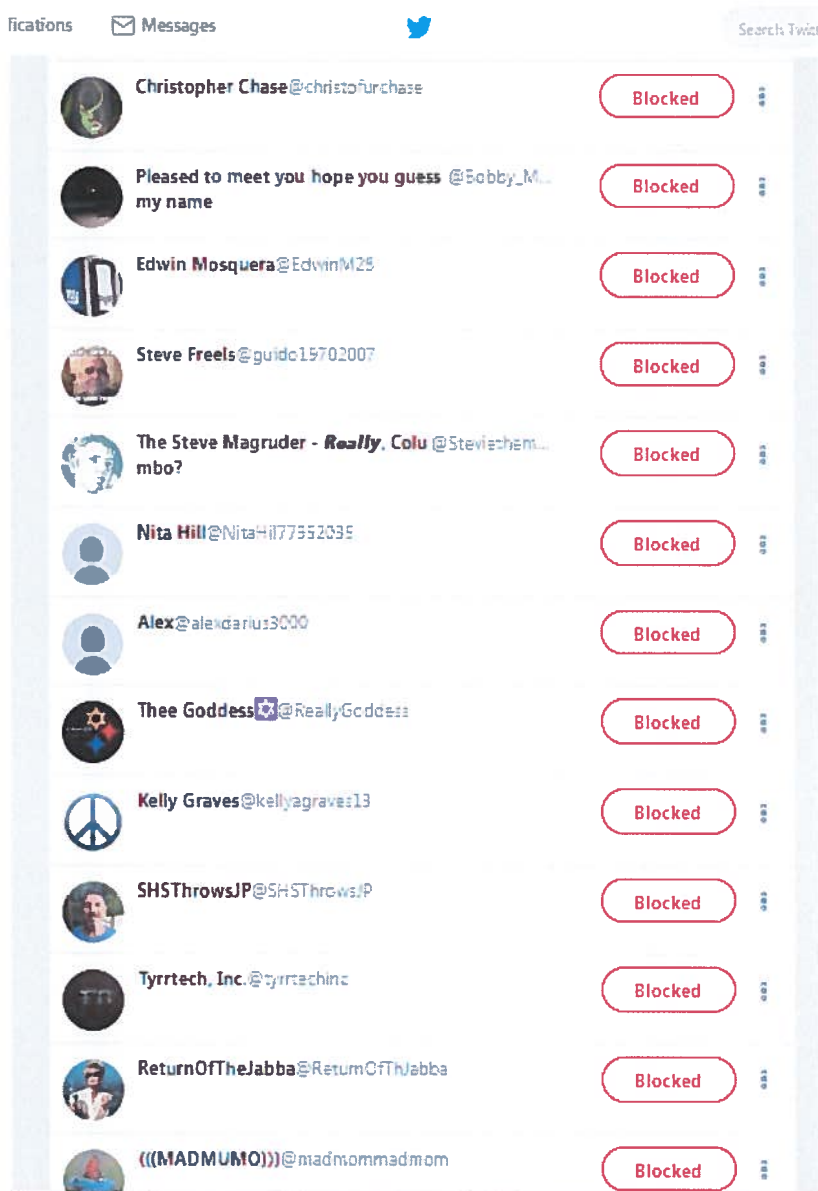
ons Messages 

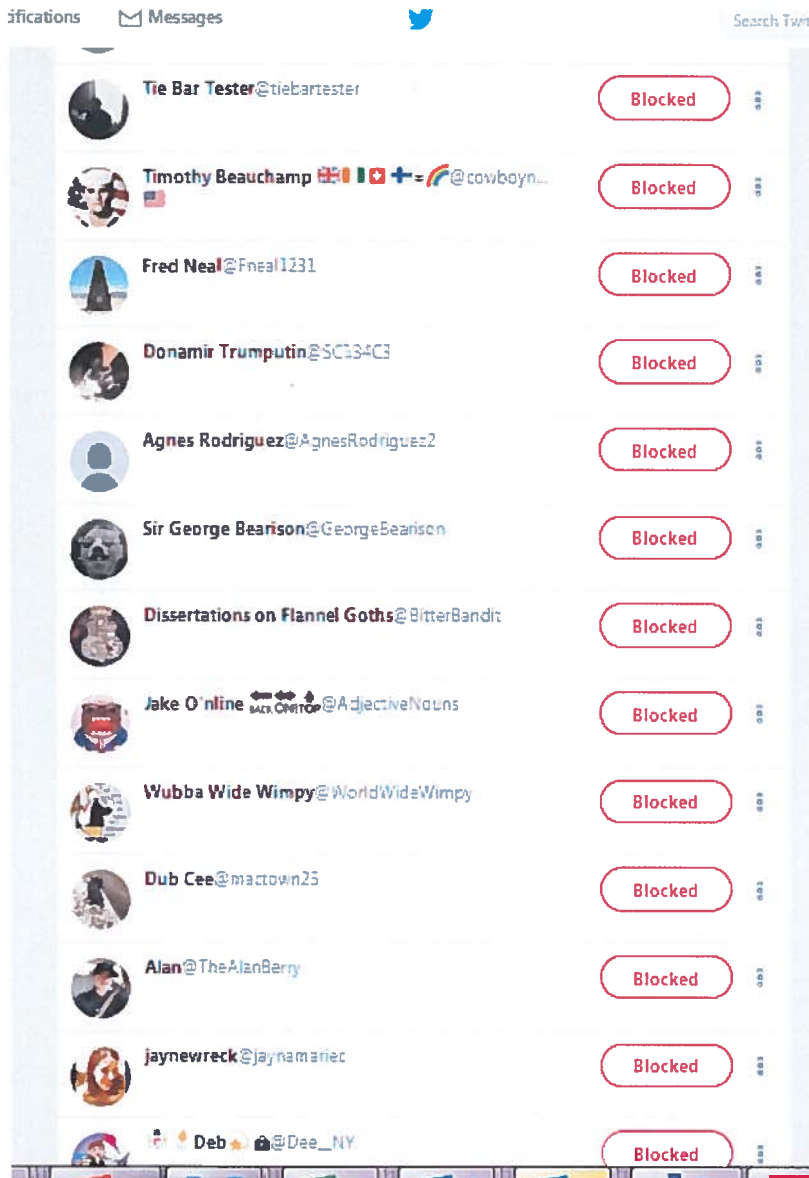
Search Twitter


	Graham Upshaw @Graham_Upshaw	Blocked	003
	KNITEWAv. DARO @N_JKXN	Blocked	003
	Matt Allalone @MattAllalone	Blocked	003
	Ryan Case @iamryanase	Blocked	003
	Chill @YungWood609	Blocked	003
	Veachel Johnson @VeacheJohnson	Blocked	003
	Morgan: A Citizen @morgansher	Blocked	003
	Cristian Istrate @eugen_istrate	Blocked	003
	Jack Burton @tweetspb	Blocked	003
	MrsLaura5 @MrsLadyL66	Blocked	003
	Adam Cohen @AdamRobertCohen	Blocked	003
	ErnstStavroBlofeld @ErnstBloTweets	Blocked	003
	Amy @amynorthgeorgia	Blocked	003




































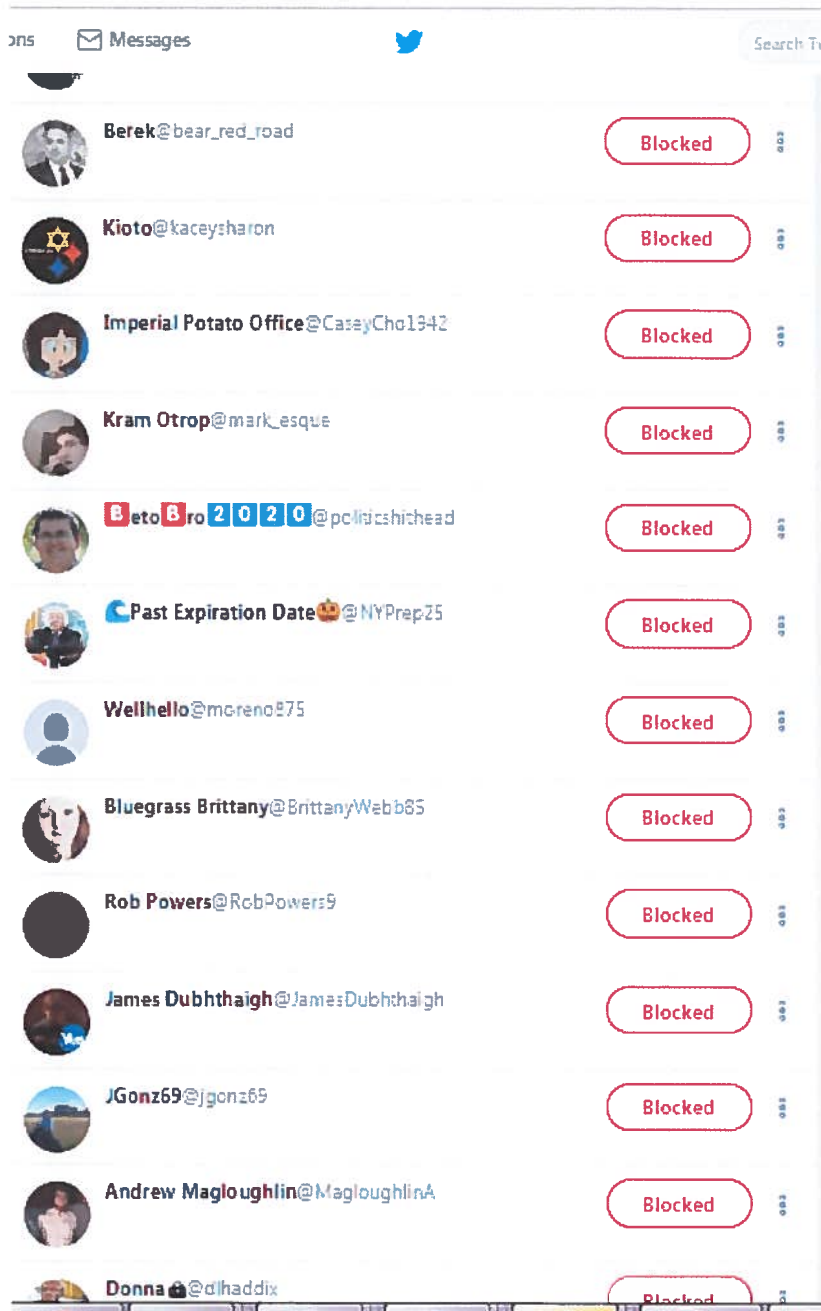


















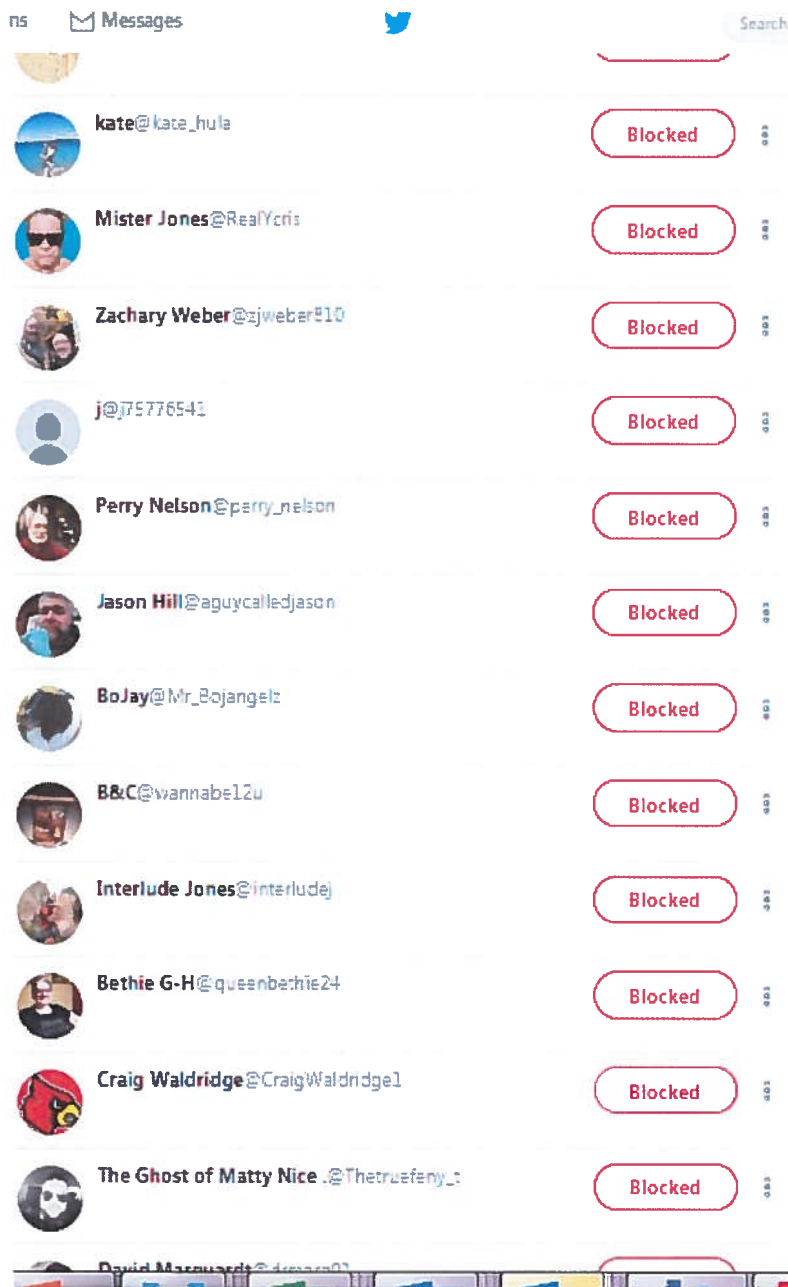
ifications  Messages














	Rep. Steven Smith  @RepStevenSmith	Blocked
	Antimagger @antimagger	Blocked
	merlin @tradersarasheep	Blocked
	Zaxtor @Zaxtor2001	Blocked
	I Love Money, Drugs & Satan @MoneyDrugsSatan	Blocked
	Christopher Husbands @cmcallihan	Blocked
	Break The Bell Jar  @breakthebelljar	Blocked
	J.D. Wireman @Sleeper_66	Blocked
	jenn   @thebestof1984	Blocked
	Paul Loki V @LordLokipv	Blocked
	Ozvaldo Pablo @OzvaldoPablo	Blocked
	Jay Garrick @American_Logic	Blocked
	A dream... literally a dream  @ImWithHillege...	Blocked














	MrTinkertrain6 @MrTinkertrain6	Blocked	0/0/1
	Conway Twittier @conwaytwittier	Blocked	0/0/1
	michael mock @Kwicko	Blocked	0/0/1
	Popular Jock @PopularJocks	Blocked	0/0/1
	Andrew K 🇺🇸@officialakspert	Blocked	0/0/1
	Doug H. Nut @DouglasH_Nut	Blocked	0/0/1
	the one with the good hair @motlau	Blocked	0/0/1
	^@HRC_04	Blocked	0/0/1
	Blurt Nobrain @blurnobrain	Blocked	0/0/1
	Pebs 🇺🇸@GhostDOOM_	Blocked	0/0/1
	Ed Nordrike Parker 🇺🇸@goncndrike	Blocked	0/0/1
	Julia Anne McCarthy @Ttxtootie	Blocked	0/0/1
	Loretta Stiles @loretta_stiles	Blocked	0/0/1






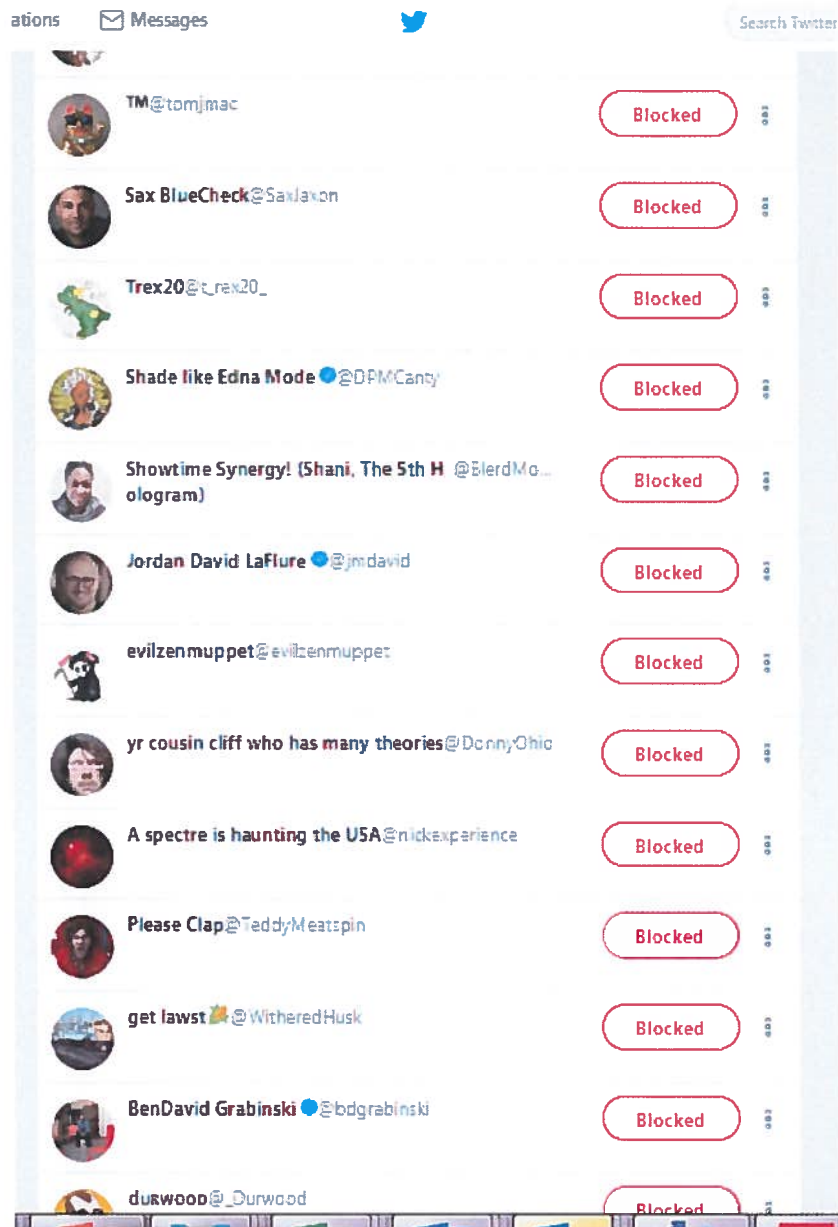
		
	Clay Anderson @AndersonClay86	Blocked
	scottie @schquigly	Blocked
	Eric D. Feldman @realericdman	Blocked
	Erin Burr @ErinBurrSir	Blocked
	Seriously @SeriousUnci	Blocked
	Scott Adams @Scottadams4321	Blocked
	Gregory Malchuk @Gregory_Malchuk	Blocked
	Gaeta @dieb_schatten	Blocked
	tom rinschler @kyrinsch	Blocked
	Mellanie Clayton @mellanie853	Blocked
	Leslie Cavanaugh @lcavanaugh922	Blocked
	olerustyplo @olerustyplo	Blocked
	kate @kate_hute	















		
	David Marquardt@drmarq01	Blocked
	August Layman@augiealikespie	Blocked
	Tanya Dawn@TanyaDawn1	Blocked
	THE_HENSLEY	Blocked
	That Kentucky Dude@theONLYjcar	Blocked
	M @myles_brown94	Blocked
	catmanbleu #TrumpTreason@catmanbleu	Blocked
	Stephanie @pitchfork_latte	Blocked
	jake shackelford@goatsNdoes	Blocked
	G Force@gdaleorr4	Blocked
	Mav @_mav_rick_	Blocked
	Alex Garner@pastoralex55	Blocked



	Arnie Roman @arnieroman1	Blocked
	Jim Dall @jld0833	Blocked
	Amy @CharmCityAmy	Blocked
	Thinkbeforeyouspeak @cagygibbon27	Blocked
	PhotoByVyp3r @PhotoByVyp3r	Blocked
	Hingle McCringleberry @MrCollinsOpus	Blocked
	Ambassador Lana Marxist @andymosk	Blocked
	Dennis @ItsTheNightShow	Blocked
	Scott McKelvey @RIGHTNOTLEGAL	Blocked
	Robin Ehrenberg @RobEhrenberg	Blocked
	Julie @JulieJChang	Blocked
	Anyway, here's Boarderwall @DaHyundaiLawyer	Blocked
	Erik Gullberg @erikgullberg	Blocked

	Mr. Gandules@JEYZUR	Blocked
	A Peaceful Girl@Nepoliticalgirl	Blocked
	Michael Mechanic dreams of the old country @MichaelM...	Blocked
	Chris@CDDye	Blocked
	Alt-Human@cspengler	Blocked
	Bill Blazejowski @darealphilobado	Blocked
	Travis @IdahoBoy_TL	Blocked
	Corey Greenwald@dolphinbore	Blocked
	Ben Dreyfuss @bendreyfuss	Blocked
	the orb knows@swagadragon	Blocked
	Brandt Brickell @brandt_brickell	Blocked
	Rye Bread@lucktard	Blocked
	har@har...	






	durwood@_Durwood	Blocked	003
	the Both Sides seer@pharmasean	Blocked	003
	Alex H. Kasprak @alexkasprak	Blocked	003
	Vitaly Tetrazzini @unclebobfoggy	Blocked	003
	Jesse Bennett @JesseUnc	Blocked	003
	SyedAbedin@bigpapapump81	Blocked	003
	Dustin Moore @DustyDoozer	Blocked	003
	The Ghost Rat (a Marginally Stable Genius) @The_Ghost_Rat	Blocked	003
	David Rose @DRose70	Blocked	003
	J.J. Allen @dirttruckerjohn	Blocked	003
	Grnd Ntnl Chmpnshps @gncshow	Blocked	003
	Sperrk@sperk44	Blocked	003
	michael @cornoiseur	Blocked	003

ons Messages 


**TJ Gusler**@Tiberious_J


Blocked

003

**paper tiger**   @thepapertigerx


Blocked

003

**Katwiccan**@Katwiccan1


Blocked

003

**Daniel**@mrdimpla5661


Blocked

003

**Warrior Gem**@Warriorgemann


Blocked

003

**Cynfulee** #LockThemUp@cyndie9172



Blocked

003

**Super Swag**@cutter_dog


Blocked

003

**alison_moyet_laugh**.aiff  @Marco0o0os


Blocked

003

**J@Jay_eighty_9**


Blocked

003

**Rich Crook**@richcrookla


Blocked

003

**Ron Beaty**@BeatyRon


Blocked


003














**Progressive Liberal**@GregHopper

Blocked

003

**ARSADDT**


ations Messages  Search

	AP@ADPSTL	Blocked	003
	J.R.@KYCoLJR	Blocked	003
	Leper-Khan@sparker095	Blocked	003
	Shaners@shanalrui	Blocked	003
	#LouisvilleAF@DerbyCityAntifa	Blocked	003
	~Gina~@TrulyHumbled84	Blocked	003
	SuziB@EMSquirrel	Blocked	003
	Rob Mendel@theHODORhustle	Blocked	003
	Fuqn' Old Guy X @AReguLiberal	Blocked	003
	Travis Gain@tgain83	Blocked	003
	JoAnn@sweethomespun	Blocked	003
	Jeanne Stevens@JeanneElise	Blocked	003
	Happyhippy260@happyhippy260	Blocked	003

ctions


Messages

5




Happyhippy260@happyhippy260

Blocked




jordyn woods stan account@AshleeMorgan21

Blocked




Jade@Kittie_Ballz

Blocked




A TRO BLACK@astr0black

Blocked




Your old pal, Stinky Wizzle@AntiEverything

Blocked




Stephen Gray@BIGBLUEBALDO

Blocked




Melwin D@MelwinDen

Blocked




SANDMAN@JimmyFranklinG2

Blocked




TripsetBeatz@Tripsetbeatz26

Blocked




I've been Kronked@Terasav4

Blocked




KD P@KDogFeeze

Blocked



YoKevinO@YoKevinO

Blocked














Dona@DonaCastilloMcI

Blocked

rtions Messages 

Search Twitter


		Blocked	0.01
	susan ward@sward92151	Blocked	0.01
	Hobie@HobieWanKenobi1	Blocked	0.03
	Hurst4Spd@J_Hurstman	Blocked	0.03
	Rich Miller@MillerTimeCars	Blocked	0.03
	Kev D @kevykev	Blocked	0.03
	Kevy Satz @FitUnionRep	Blocked	0.03
	████████████████████@EZ_Lerner	Blocked	0.03
	Chris Matuszak@Two3mack	Blocked	0.03
	Glenjamin@Glencoc44u	Blocked	0.03
	patrick @kingcoldix	Blocked	0.03
	Jocelyn@_2lodeuyn	Blocked	0.03
	Dan Lane@DJchuggachugga	Blocked	0.03

5 Messages			Search 1
	Matt@I_can_be_a_duck	Blocked	003
	cathie@Resistin7la	Blocked	003
	Betty Humpter@betty_humpter	Blocked	003
	Rick Billingsley@rbillingsley	Blocked	003
	Kentucky Chris@KyChris77	Blocked	003
	eric black@Ericblack155	Blocked	003
	Brandy Lain@brandy_lain	Blocked	003
	Brandon@hiperfin	Blocked	003
	bruce donohue@bkthedunes	Blocked	003
	Dax turns left@Dax_turns_left	Blocked	003
	BoredLiberal@TheBoredLiberal	Blocked	003
	Tim Anderson@soldierreader	Blocked	003
	Lara Christ@LaraIelle	Blocked	003


itions

Messages


Search

**Rob Foellinger**@robfoellinger


Blocked

**Andy V**@avisme74


Blocked

**Nick Neely**@ukfanneely


Blocked

**Daddie Ken4e**@MilneDaddie4e


Blocked

**Carrie Nation, Kentuckian TM**@CarrieNationKY


Blocked

**Kelsey G.**@kegiurg


Blocked

**Kevin Massey**@kevincorgi


Blocked

**Darkstarflashes**@Darkstarflashes


Blocked

**Ken Turner**@kenturnerlaw


Blocked

**KentuckyTrueBlue#BBN**@univerky


Blocked

**((TheRReport)))**@TheRReport














Blocked


**Ashley**@ochgoodness


Blocked

**Christy Tobin**@christytobin


Blocked

ions	Messages		Search
	Marcus_214 @Marcus_5448	Blocked	0/0
	Maya Surra @MayaSurra	Blocked	0/0
	DJD @ddicordia	Blocked	0/0
	Curmudgeon at Law ™ (I need a bigger @obxl... glass)	Blocked	0/0
	Atomic Studios @Atomic_Studios	Blocked	0/0
	Richard Madison @mad169	Blocked	0/0
	Kitty Katt @kolonelkatt	Blocked	0/0
	COREY BANG @coreytang1	Blocked	0/0
	Bryon Vaught @bvot	Blocked	0/0
	Play Hockey Big 🏒 @a21beec6ae7f450	Blocked	0/0
	brittany schnelle @brittschnelle	Blocked	0/0
	David Cross @dlcross	Blocked	0/0
	Kati 🐘 🌻 @KatiMadden	Blocked	0/0


ations Messages  Search

**Brian Bell**@BrianBe12624073


Blocked 001

**Max Green**@Max_Green


Blocked 001

**G Jennings**@jennings31670


Blocked 001

**Chris Mudd**@WonkaStar


Blocked 001

**Flower Vase**@iwbtp231


Blocked 001

**Vonda Martin**@MartinVonda


Blocked 001

**Whydoyouwannaknow**@introvertingky


Blocked 001

**Walter Frazier**@WalterFrazier


Blocked 001

**Tim K.**@UltimoNerdanic


Blocked 001

**Jamie Dunaway**@SlimMenace24














Blocked 001

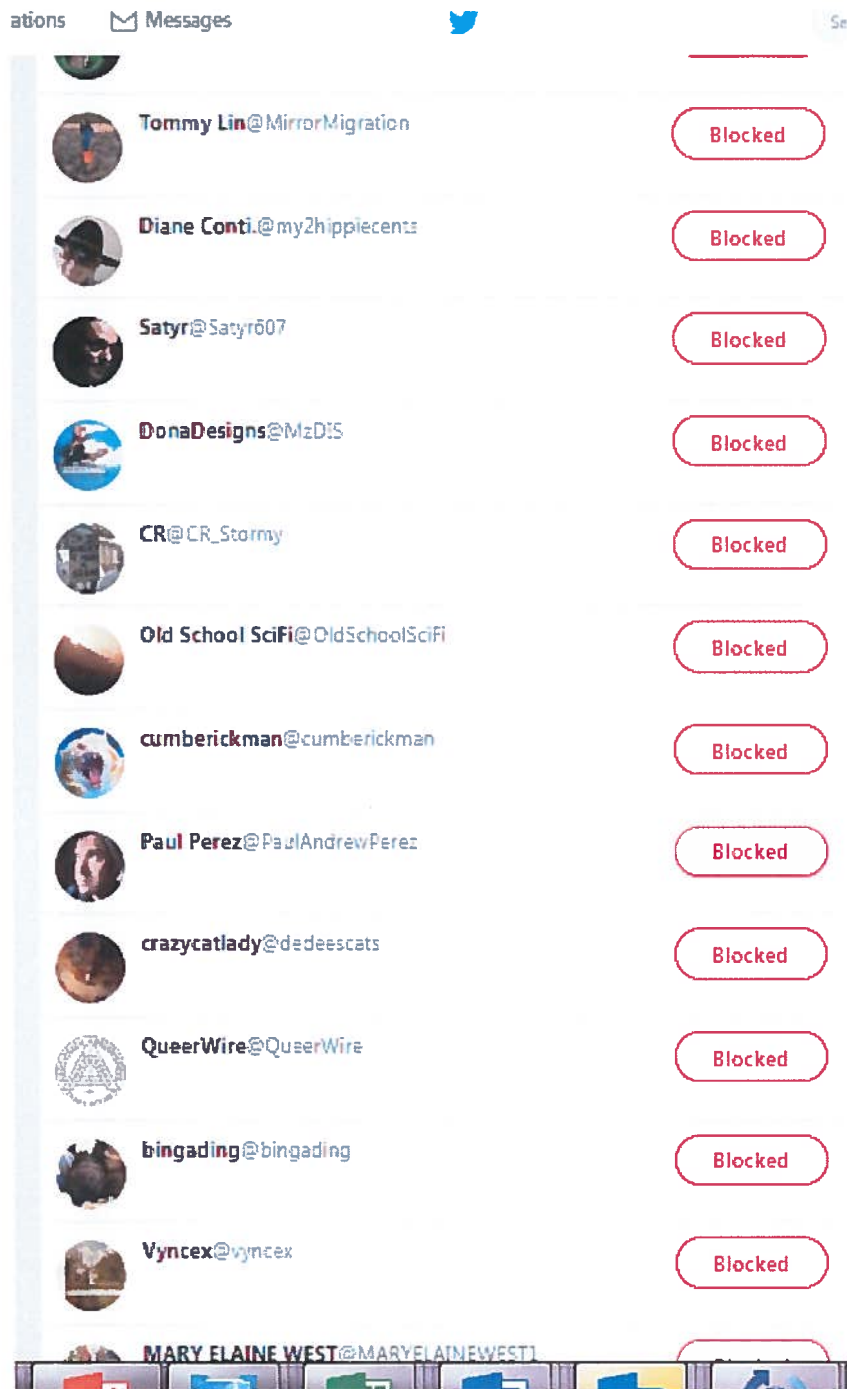
**maureen**@midnightlantern0

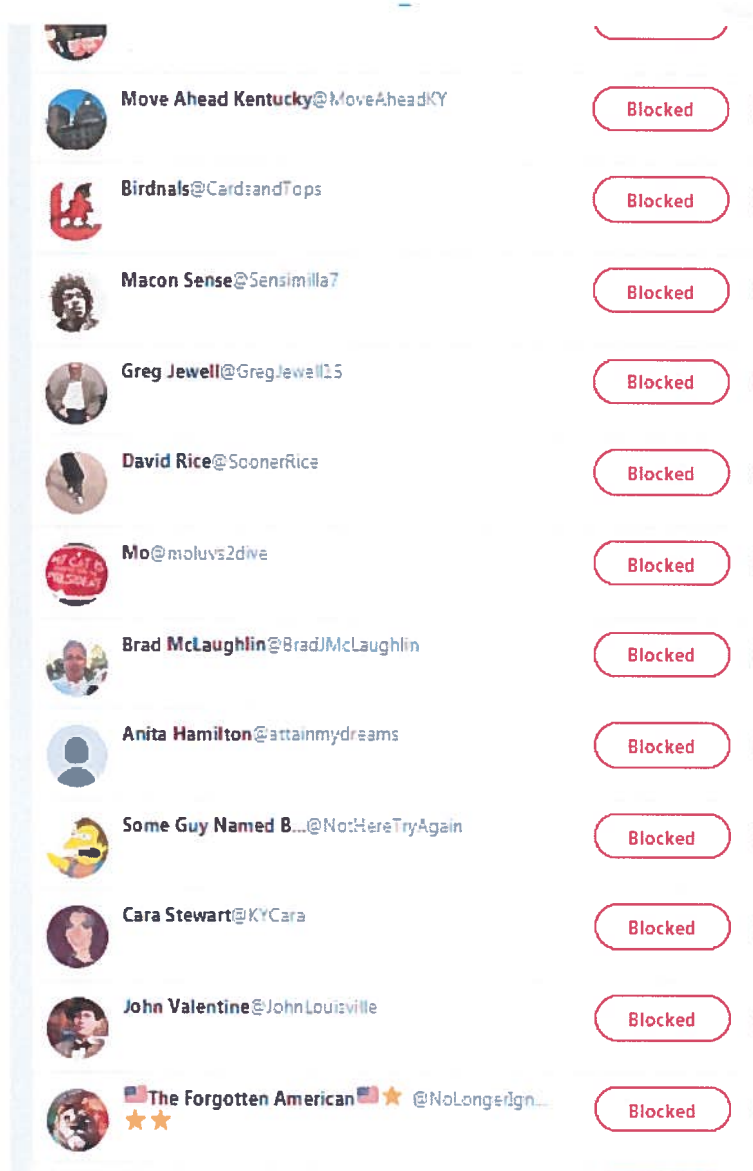
Blocked 001














**mary jo stevens**@MaryjoMjs


Blocked 403













	Mikey M @Mikaymgm1701	Blocked	403
	Michael @Michael2014abc	Blocked	403
	Make Football Violent Again @DadddyJ	Blocked	403
	SpadeintheUSA @alanspade	Blocked	403
	KYFilly57 @KYFilly57	Blocked	403
	Miss Matched Shoes @threajuniforms	Blocked	403
	howard wagner @howardwagner1	Blocked	403
	Joshua Norton II @Homaranisto1	Blocked	403
	MikeSmithComic @mikesmithcomic	Blocked	403
	Guy Who Threw One Shoe At Bush @TomLeeBo... 43	Blocked	403
	Pauline Chapman @mygmcsit	Blocked	403
	Greta GG @GretaGarbolini	Blocked	403
	Todd Payne @PaperlessTeachr	Blocked	403
















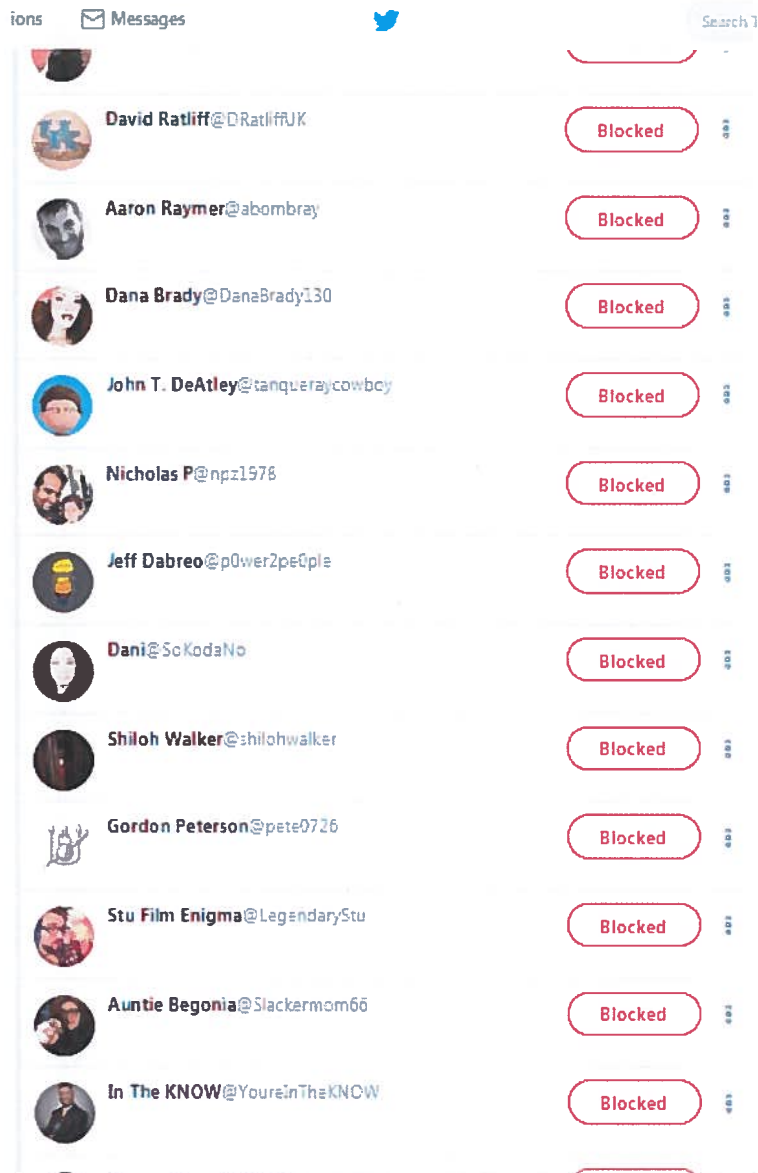















		
	(((Cathy Lubenski)))@TrashyChic	Blocked 483
	B-Spice@BSpicerJofL	Blocked 483
	HKF🇺🇸🇨🇦🇩🇪 @hn6410	Blocked 483
	Hank@HankMiller	Blocked 483
	Justin Sparks@itwaswritten_56	Blocked 481
	Annette McCullough@anniedarzie	Blocked 483
	Jihan Saino/Core Fitness Solutions@JihanSaino	Blocked 483
	Mr Peabody Coletrane@Travis/Peacock	Blocked 483
	ledsbard 🦋🍷🍷🍷🍷🍷@ledsbard	Blocked 483
	N.H. Harpe🇺🇸🇺🇸🇺🇸🇺🇸🇺🇸@NHarpesnewby	Blocked 484
	Dan0 🇺🇸🇺🇸502🇺🇸@drobryan68	Blocked 483
	day by day, bird by bird™@Miss_Placed_	Blocked 483


itions Messages  Search


	Matthew Verkamp @MatthewVerkamp	Blocked	003
	Angry Capt America @BigDaddyB709	Blocked	003
	SueSeaShell @mom2sons	Blocked	003
	Sherron Meinert @sherron_meinert	Blocked	003
	soundnado @soundnado	Blocked	003
	Jonathan Carman @JonC54	Blocked	003
	Dan Jones @DanJonesmspelng	Blocked	003
	Freddie @FCW1115	Blocked	003
	I'm Tired @Mr_Gingersaurus	Blocked	003
	D.A. Greene @REALDaveoTDaves	Blocked	003
	Ya Know @Harris21	Blocked	003
	Sean is Taxing @boczynerd	Blocked	003

			
	Thy self is named Lisa.@heroineinabook	Blocked	003
	bill storm@SeabiebroxBill	Blocked	003
	Coonbuster2018@coonbuster2018	Blocked	003
	Yvonne@Yvonne4166	Blocked	003
	Cycle The Pacific Northwest@Cyclethepacwett	Blocked	003
	I am Dave@mrblaq	Blocked	003
	Kim@miss_kim529	Blocked	003
	gnostrum@gnostrum_art	Blocked	002
	sarah vetoe@notMrsVeto	Blocked	003
	Clark Cox@clarkcox	Blocked	003
	Steven Woodruff@stevendwoodruff	Blocked	003
	Comedian Tara Crush@TaraCRUSH	Blocked	003




		
	Cesar Manuel@BXTodaHeart	Blocked
	Deron T. Enolad	Blocked
	Abominable Snowflake@Breezy182	Blocked
	The Blue Wave@acklover	Blocked
	Your Dad@El_Deg02	Blocked
	Feral Negress@FeralNegress	Blocked
	Alana@alana_salona	Blocked
	Farrah Alexander@AuthorFarrah	Blocked
	Jennifer@jho35	Blocked
	sbucel@Russel58765	Blocked
	Beth Music@music_beth	Blocked
	Coach@CoachBourbonUSA	Blocked


ons Messages  See

**Nate Ennui**@NateEnnui


Blocked

**Wanda Tinasky**@cherealtinasky


Blocked

**JawboneFnAss**@Jawbonefnass


Blocked

**Craig Campbell**@Craig_41144


Blocked

**Scott Springer**@scott_springer


Blocked

**Fish Fingers**@FishFin13857570


Blocked

**Richard Meyer**@Richard32653550


Blocked

**Mueller May Have Something**@1:timemind

Blocked

**Jaelithe**@Jaelithe1


Blocked

**DD Don Mjex**@NowhereBlander


Blocked

Regular Guy@RegularGuyAnon

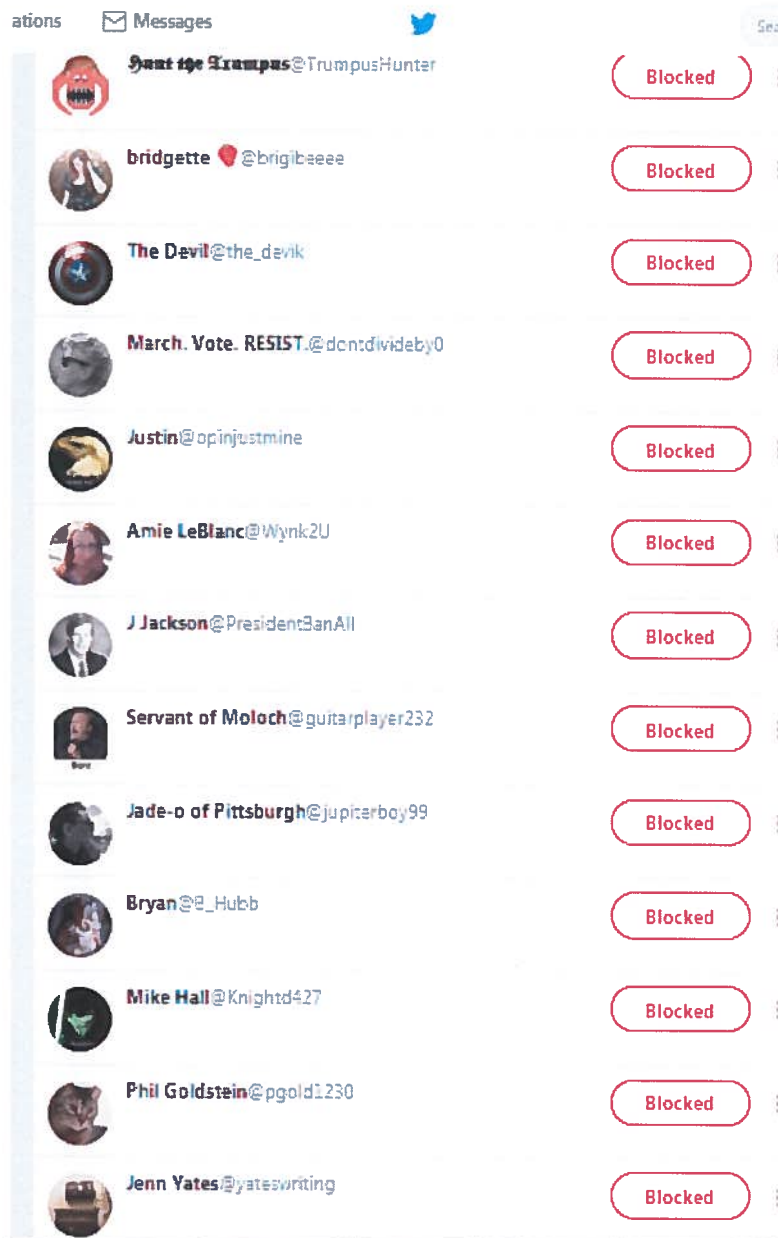
Blocked













**Aphex Mandelbrot**@AphexMandelbrot


Blocked






















**Cam**@cammywammy240

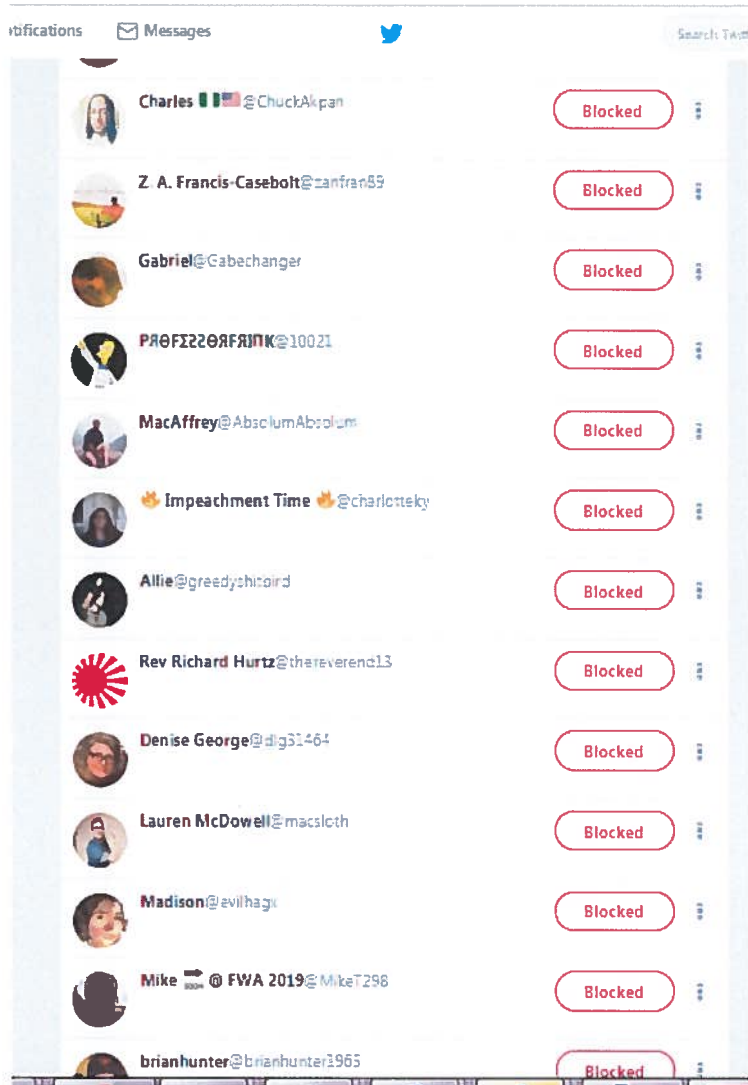
Blocked

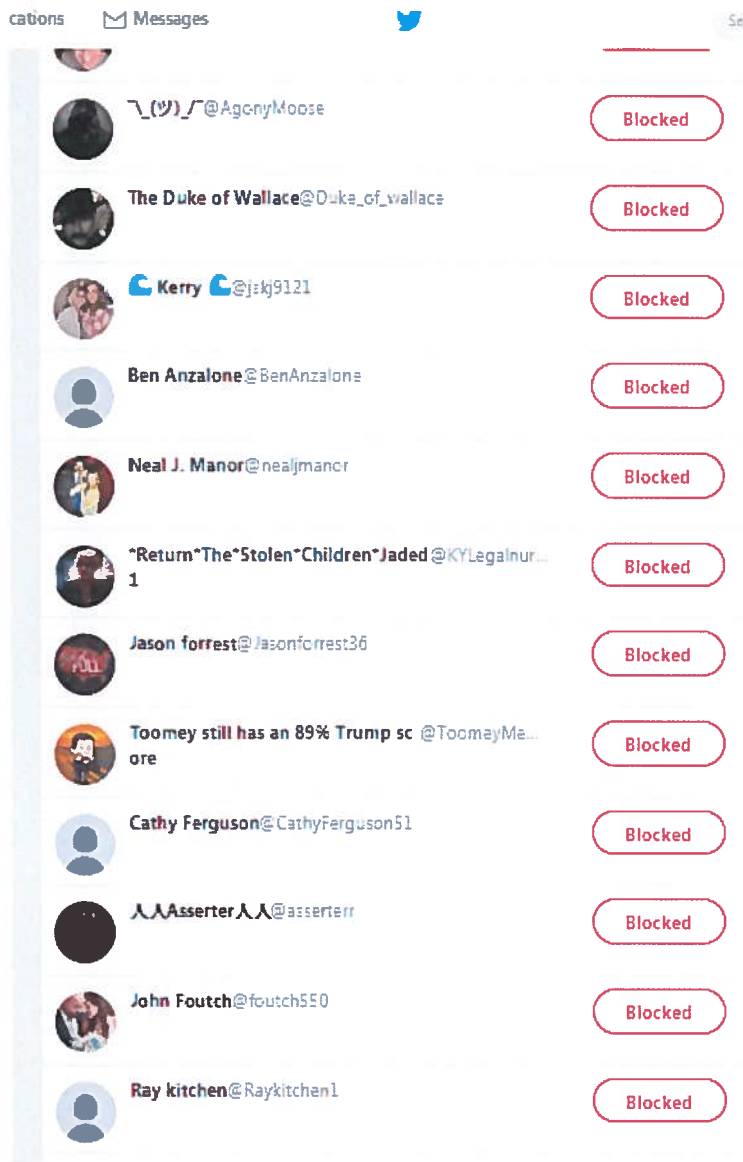















Me	Hello It's Me@badharmonica	Blocked	481
	Sharon Thompson@kentuckygrandma	Blocked	483
	Alaska@Huskiesx2	Blocked	483
	Alex Jones @AlexJones123432	Blocked	483
	rosemary@rsmcqueary	Blocked	483
	Luke Zachert@NOMAD_Fiddler	Blocked	483
	Jeff @jhparker	Blocked	483
	Mike Jones@testify2015	Blocked	483
	Mallory Farris Brown@malloryfarris	Blocked	483
	1@depaninediscord	Blocked	483
	Robert Beatty@EdSunspot	Blocked	483
	Malebranche@foxux	Blocked	483
	Super Bionic Crone@super_crone	Blocked	483

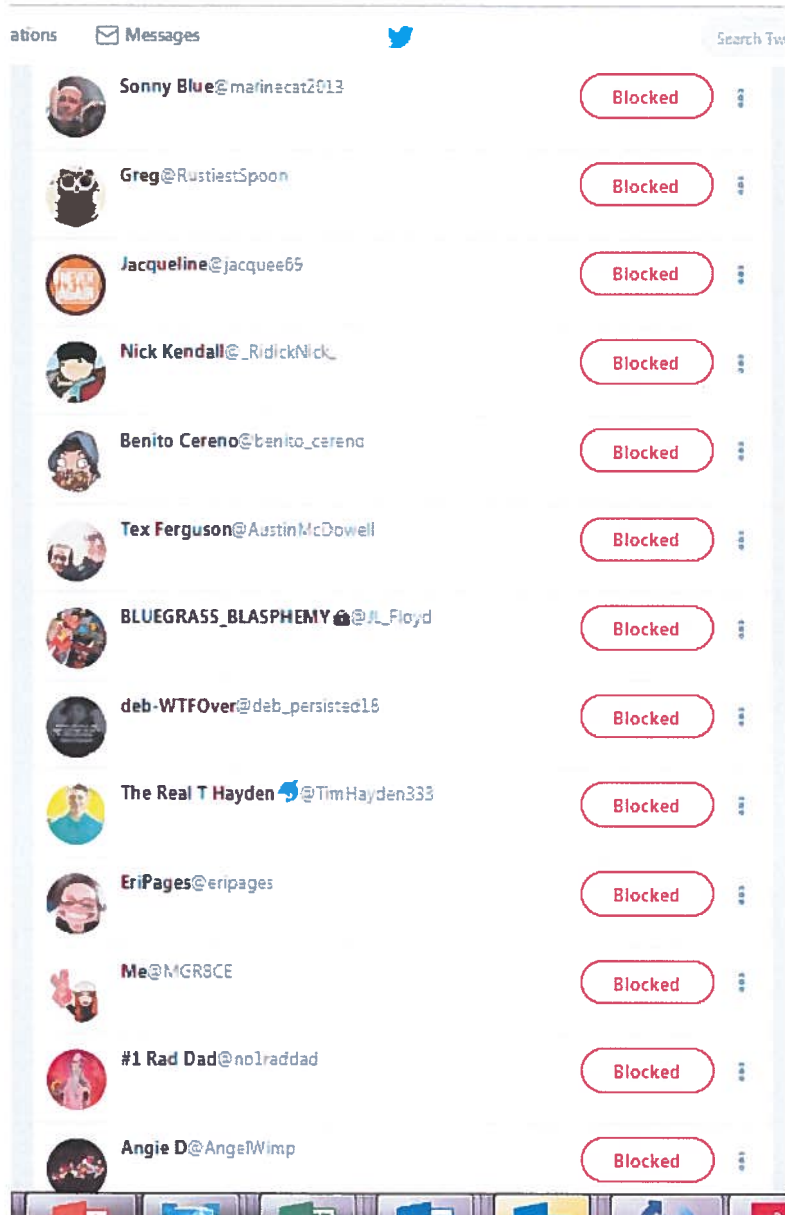
ations Messages  Search Twitter














	David Scott Aubrey@davidakaclean	Blocked	0/0
	MatchlessValencia@Valarya	Blocked	0/0
	K.K.@Kristyn004	Blocked	0/0
	beetleblonde@annapclisblonde	Blocked	0/0
	Tia  @tialyn636	Blocked	0/0
	m@shiki2518	Blocked	0/0
	Tony Grubb@politicsfirst	Blocked	0/0
	Katie Jo@dublinrox52	Blocked	0/0
	Otis Galloway@cgallowaymusic	Blocked	0/0
	Danielle Solzman       SX5 @DanielleSAT... W	Blocked	0/0
	reDQlus@reDQlus	Blocked	0/0
	Fwuffy Da Destwoyah@FwuffyDestwoyah	Blocked	0/0
	~ Mari  ~ @mariadkins92	Blocked	0/0































Following			2018/11/19		
	Jay@JayDog335		Blocked	483	
	Ryan Utterback@UtterNonsense65		Blocked	403	
	sunedee@sunedee_2000		Blocked	481	
	CravesZ@ICRvs		Blocked	502	
	J. Erick Sinkhorn@jericks		Blocked	481	
	Tony Fogle@TonyMon74558395		Blocked	141	
	Zac Keener@Keenbean_17		Blocked	101	
	Dwayne Sutton appreciation acct@DHu#714		Blocked	981	
	Jason@mathboywonder		Blocked	141	
	Nope NoName@electriccougars		Blocked	142	
	JRay@jray5091		Blocked	141	
	Amy #GoFactYourself America@patton_amye		Blocked	141	
	Capen Blue@marinemoon2013				



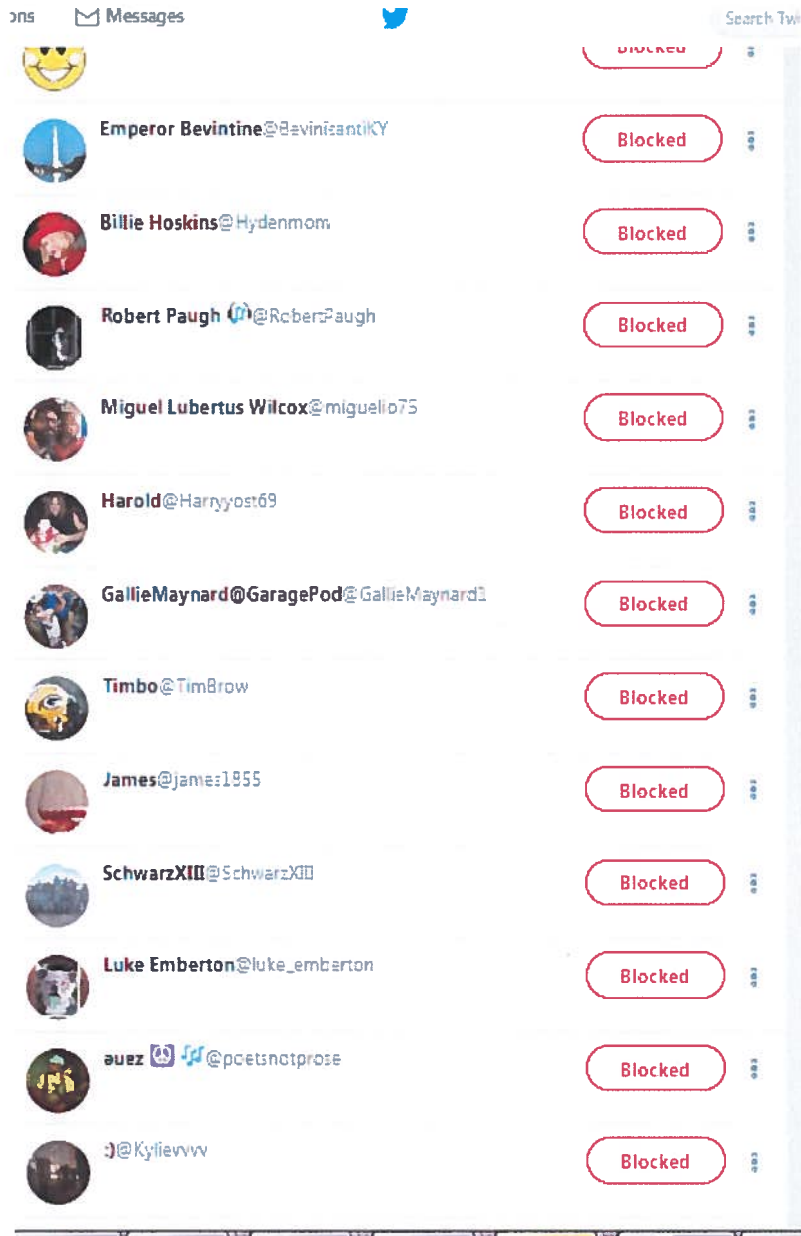
	L.A.S. @LAS_Trucking	Blocked	0/03
	eubtgt @eu69357	Blocked	0/03
	Johnny Sweetwater @hocpboy2099	Blocked	0/03
	James Sturgill @hide_n_go_geek	Blocked	0/03
	TKJH34 @kycats34	Blocked	0/03
	Donald's Conscience @ReallyRealDonny	Blocked	0/03
	BD5America @IsraeliFascism	Blocked	0/03
	Shannon Malcom @Shantasti	Blocked	0/03
	Amy Mischler @pikeccinjustice	Blocked	0/03
	Brandon Massengale @BrandonFromKY	Blocked	0/03
	Karen is sick of shitty people with no com @kma... passion	Blocked	0/03
	Jamel Jackson @JamelJackson10	Blocked	0/03
	Fred Davies @DR_Fred_Davies	Blocked	0/03

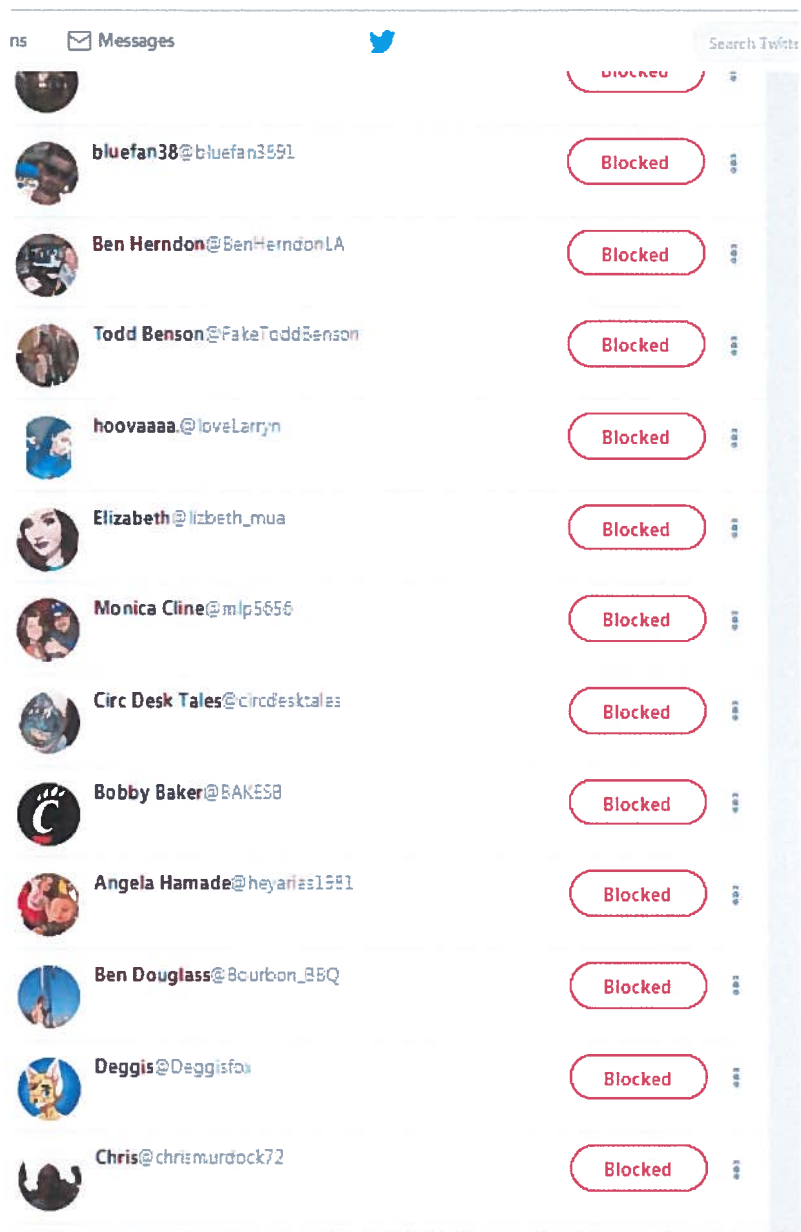
Messages			Search
	jenny hobson @jmhobsonschoice	Blocked	003
	KellsBells @The_Kelli_Zombi	Blocked	003
	GObigBLUE @CLEGoBigBLUE	Blocked	003
	Terri Hunt @TerrihuntTerri	Blocked	003
	k@birdswithteeth7	Blocked	003
	Larry Adair @LarryAdair	Blocked	003
	Sean Ross Sapp of Fightful.com @SeanRossSapp	Blocked	003
	Ethan AD @EthanAD	Blocked	003
	PeteyBeeBest @PeteytheChi	Blocked	003
	Kaylena A.D. McFarlane @AKaylena	Blocked	003
	Callie @callie78	Blocked	003
	allowat @allowat4	Blocked	003
	[redacted] @ [redacted]		














Messages			Search
	allowat @allowat4	Blocked	001
	Jerry west @Jerrywe79598376	Blocked	002
	Affordable Access to BOFA @BriceBone	Blocked	003
	webb @webb53963868	Blocked	004
	Patrick Ray @patrickray1969	Blocked	005
	Kentuckian @kanlikens1	Blocked	006
	Voltaire @voltaire1769	Blocked	007
	Taco Truck Takeover @LibbyLoumax	Blocked	008
	M'9 @292kmartin1	Blocked	009
	Gary Lovely @gary_lovely	Blocked	010
	Krystal A. Spencer @KrystalASpencer	Blocked	011
	Jean Valjean Ralphio @comradejedi	Blocked	012
	Antifa Quiznos @itsadamntragedy	Blocked	013














Messages  Search Twitter

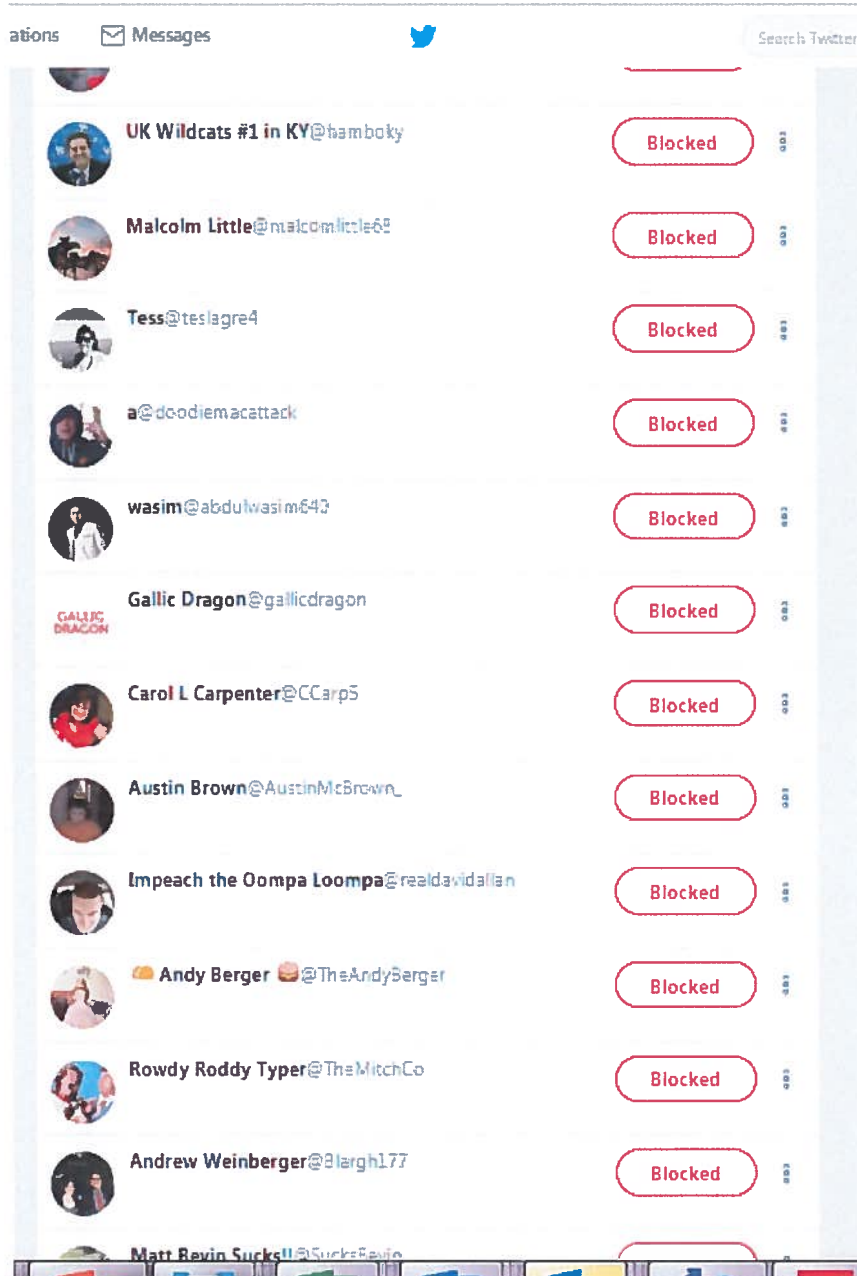
	your friendly neighborhood asshole @AssholeTwee... le	Blocked	003
	Mark Manis @MarkManis1	Blocked	003
	AJ @MehSince77	Blocked	003
	Living in Red State Hell @fedupteacher1	Blocked	003
	Sandra Covert @sandracvt	Blocked	003
	Eaton @beenwindmilled	Blocked	003
	Dan Rather Not @JamesMatthewSe1	Blocked	003
	David Ball @davidfreaknball	Blocked	003
	Kentucky Glenn @lil_donnie_t	Blocked	003
	Bryn @brynelise_13	Blocked	003
	Great Scalia's Ghost @CocaineCentaur	Blocked	003
	Emperor Bevine @BevinisantiKY	Blocked	003
	Billie Hoskins @Hydenmom	Blocked	003







































	Teel@teel_99	Blocked
	Shawn Todd@Toddishh	Blocked
	Cait@caithymtinchert1	Blocked
	Paapi Jerns @ZatchLeonard	Blocked
	Brent Owen@TheBrentOwen	Blocked
	Tony Feltner@TonyFeltner	Blocked
	1-Adam-12@adam_js_awesome	Blocked
	Barry Hobbs Jr @BarryHobbsJr	Blocked
	KY Patriot@KYPatriot17	Blocked
	DALE@dbutlerbbn	Blocked
	shannon king@slking609	Blocked
	B@bcoulter1979	Blocked
	The Original Party Dog @jcernelli	Blocked














	Reggie Sharpe@devvdogg	Blocked	08/13
	Angela@aca902	Blocked	08/13
	Rich Homie Don@dhenzman	Blocked	08/13
	Sam Clark@samrocksc	Blocked	08/13
	Asad Malghani@ASMalghani	Blocked	08/13
	Fratercula@trolltrip	Blocked	08/13
	Jason Herbert@HerbertHistory	Blocked	08/13
	Robbie@robbieflygirl59	Blocked	08/13
	Brandon Crowe@bcrowe02	Blocked	08/13
	Special K@Buckets_pails	Blocked	08/13
	Stagger Lee@StaggerLee3769	Blocked	08/13
	Truman Burbank@Carmansave007	Blocked	08/13
	Jason Perkey@jasonperkey	Blocked	3/8

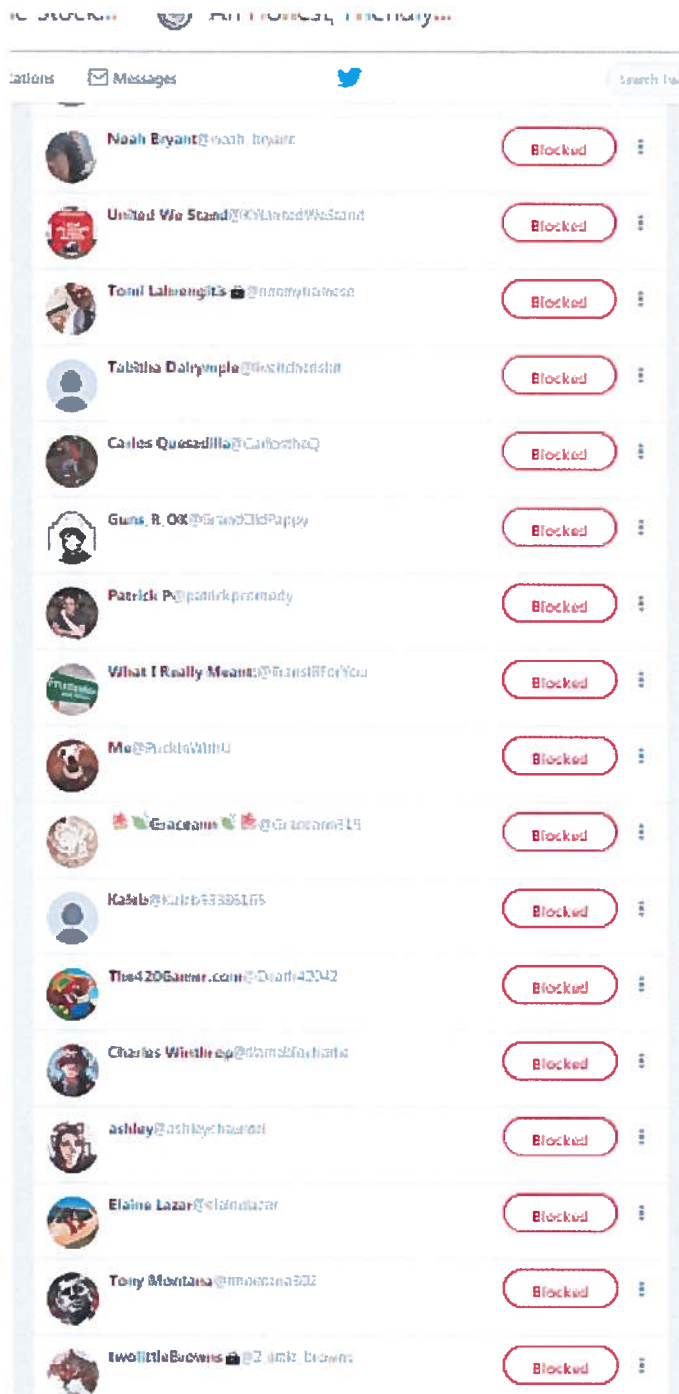


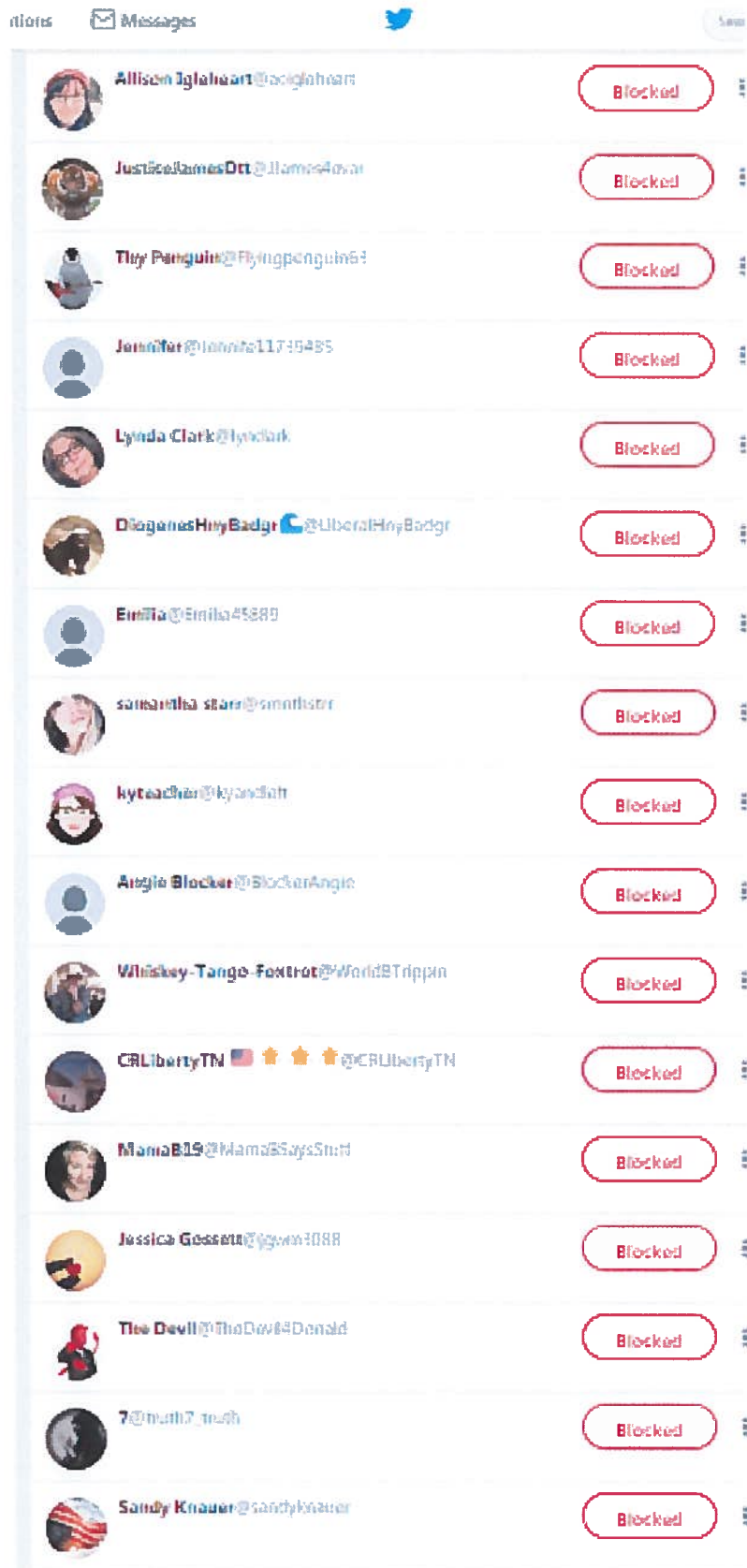
ations Messages  Search: 1

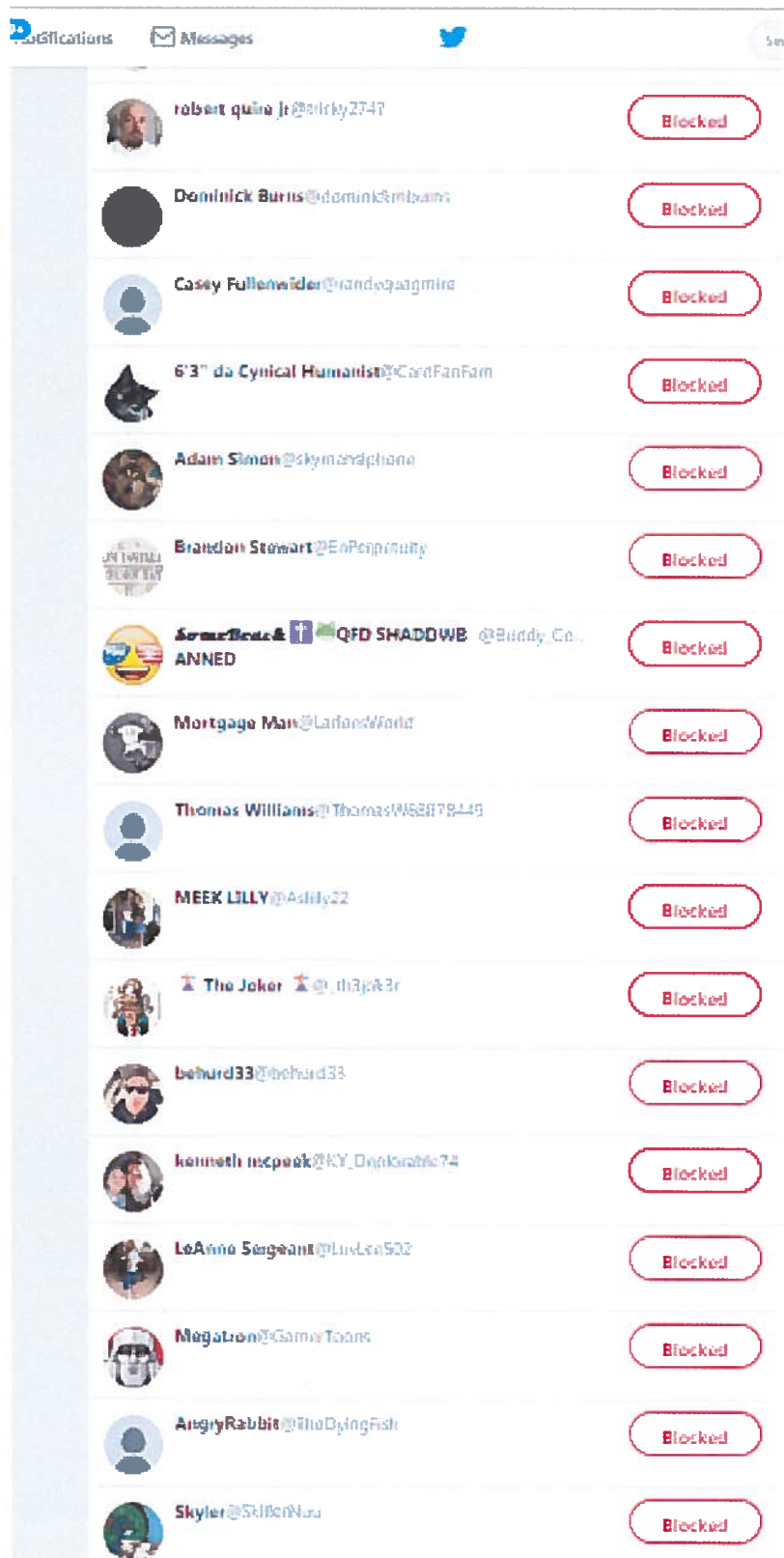
		Matt Bevin Sucks!! @SucksBevin	Blocked	0/01
		You_Dont_Know_Me @YouDont60187262	Blocked	0/01
		INTJ Minds @INTJ_Minds	Blocked	0/01
		Betsy Melton @organictreats2	Blocked	0/01
		SStone @SharinStone	Blocked	0/01
		Justin Clay @JCP2501	Blocked	0/01
		Matt Bevin Mirror @MattBevinRT	Blocked	0/01
		lilyyyy @spaceyears	Blocked	0/01
		Michael Hesler @mihesler	Blocked	0/01
		dustin f @cooterball513	Blocked	0/01
		brhad @wats1964	Blocked	0/01
		Grizzle @mrjeremygrizzle	Blocked	0/01


















	Payton Elswick @Pelswick42	Blocked
	Anger Mouse @JeremyRoss15	Blocked
	Brandilyn Barker @BarkerBrand	Blocked
	Alan M Zukof @alanz55	Blocked
	scott @boscx014	Blocked
	Terry Wyatt @MSbandrunner	Blocked
	Brenden Minervino @BPMinervino	Blocked
	Terry Scott @TerrySc84669097	Blocked
	Villen 502 @JTVillen502	Blocked
	Cardinal4Life @jrg1015	Blocked
	Alex Woodworth @alexwoodworth55	Blocked
	Darghelmet @patricicblou	Blocked
	Paul Fleetwood @AmazingFlee:	Blocked





































	Charlie Cy @Charlie27Cy	Blocked
	Kevin Lancaster @CardssoHard	Blocked
	Gordon Nichols @Gnick72	Blocked
	Levin Loeffler @LoefflerLevin	Blocked
	Bill Smith @GaLiberalGuy	Blocked
	Chuck Ramsey @ChuckRamsey17	Blocked
	Benjamin, not Walter @pintsandpoetry	Blocked
	not damon thayer @notdamon_thayer	Blocked
	813 and 🍷🍷🍷 @TampaLouie78	Blocked
	Jack Straw, from Wichita .@DylanRayMiller	Blocked
	rcroy74 @rcroy74	Blocked
	Jarrod Keating @Thebingochamp	Blocked
	Truth's sound @crocks_r911	Blocked

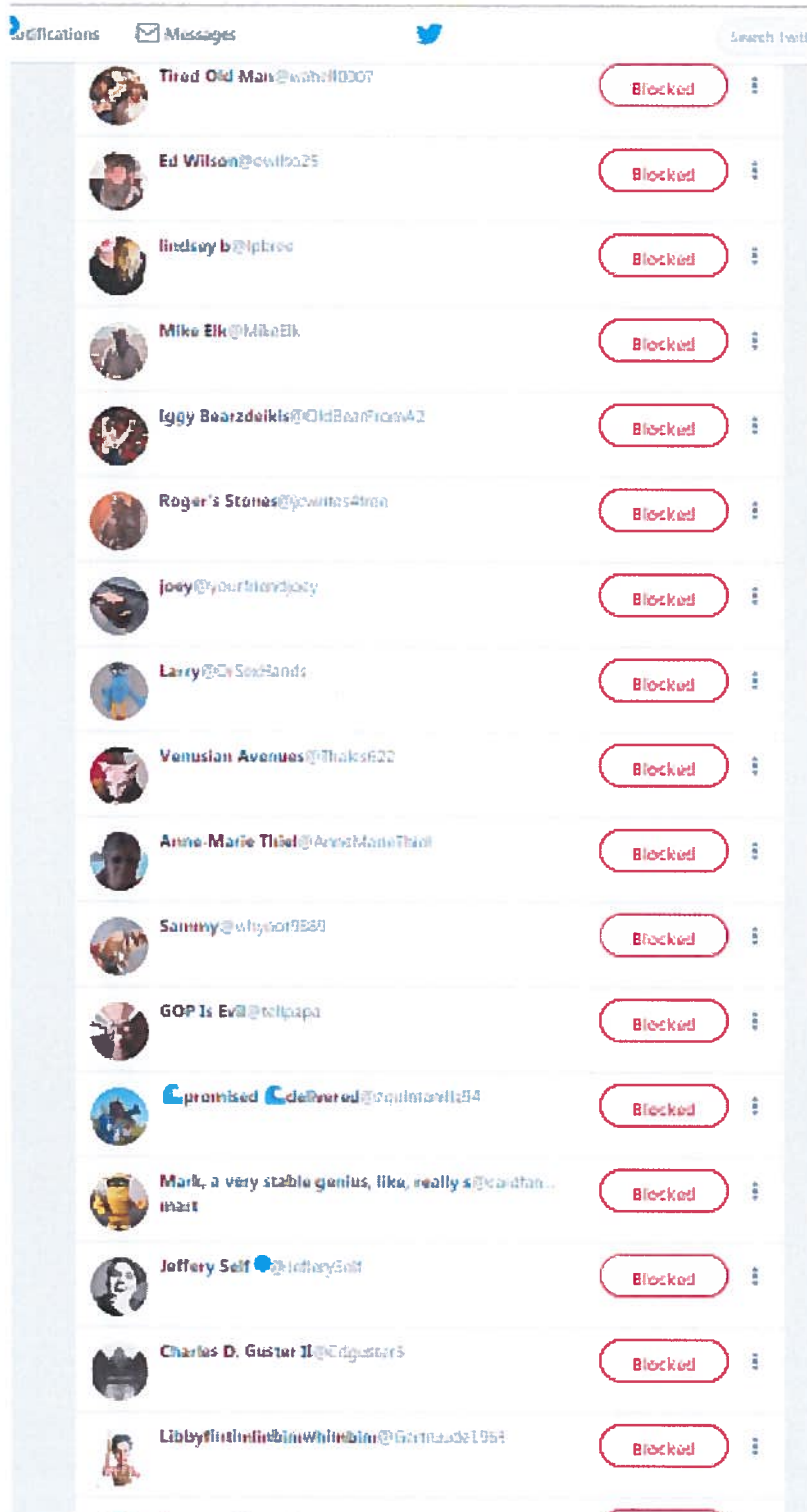


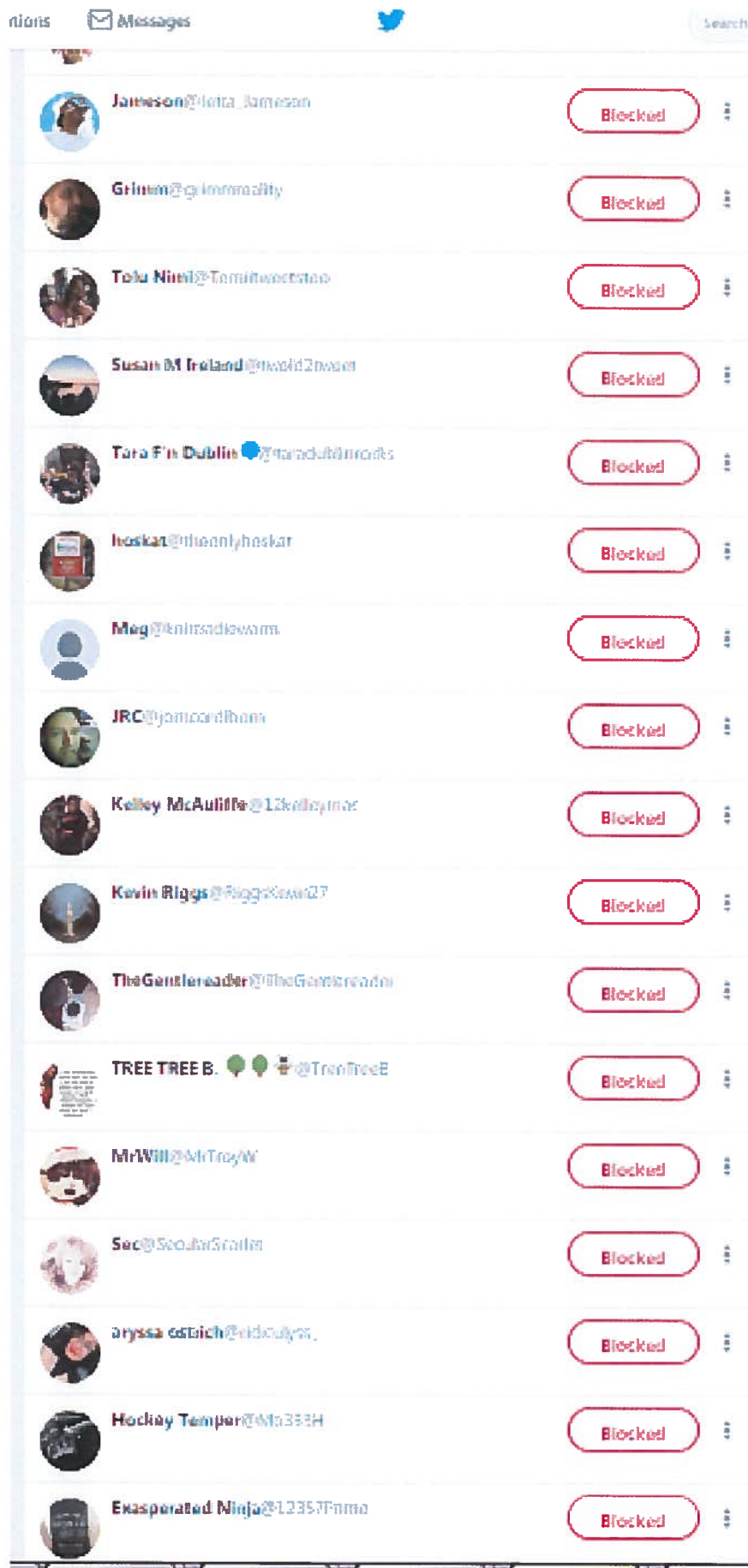


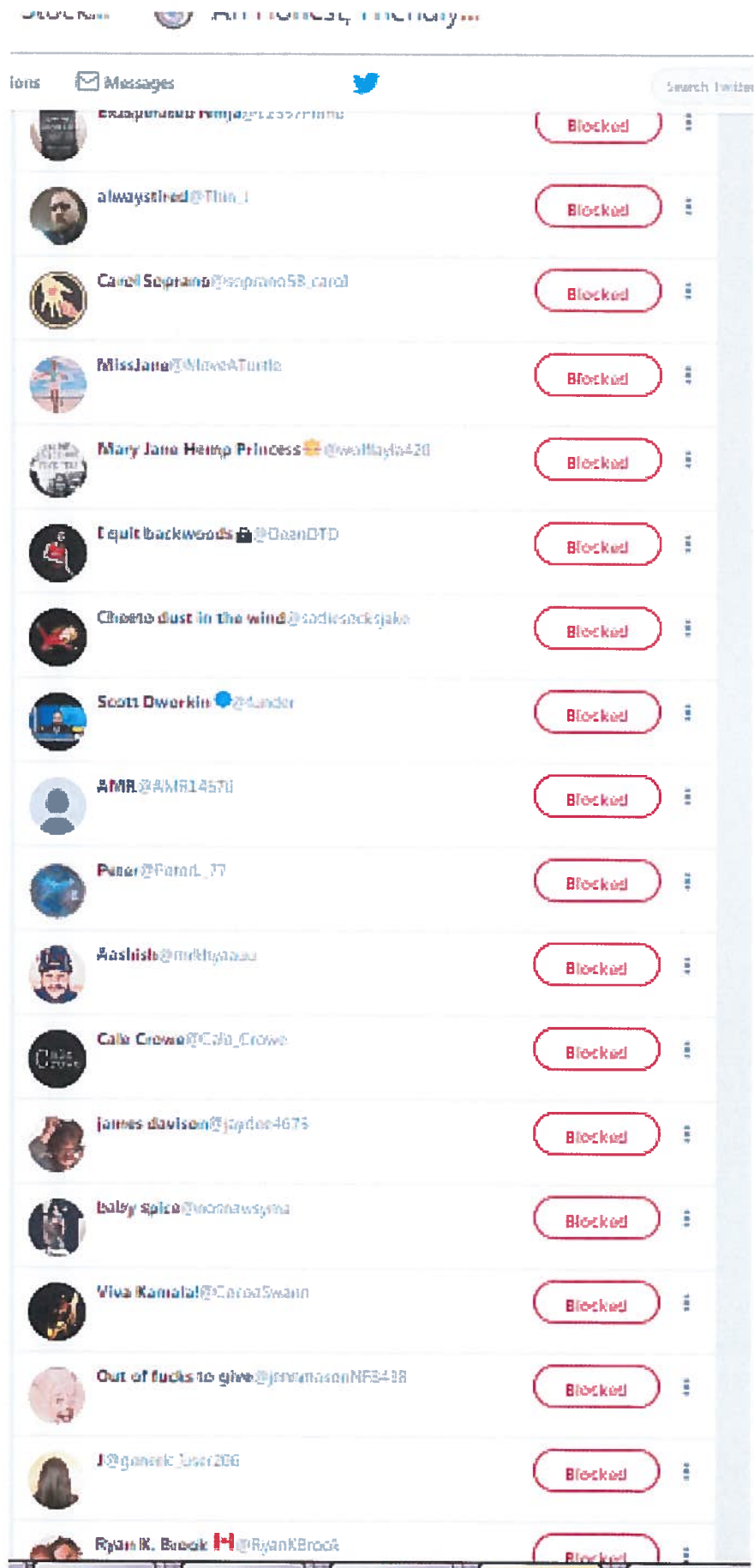


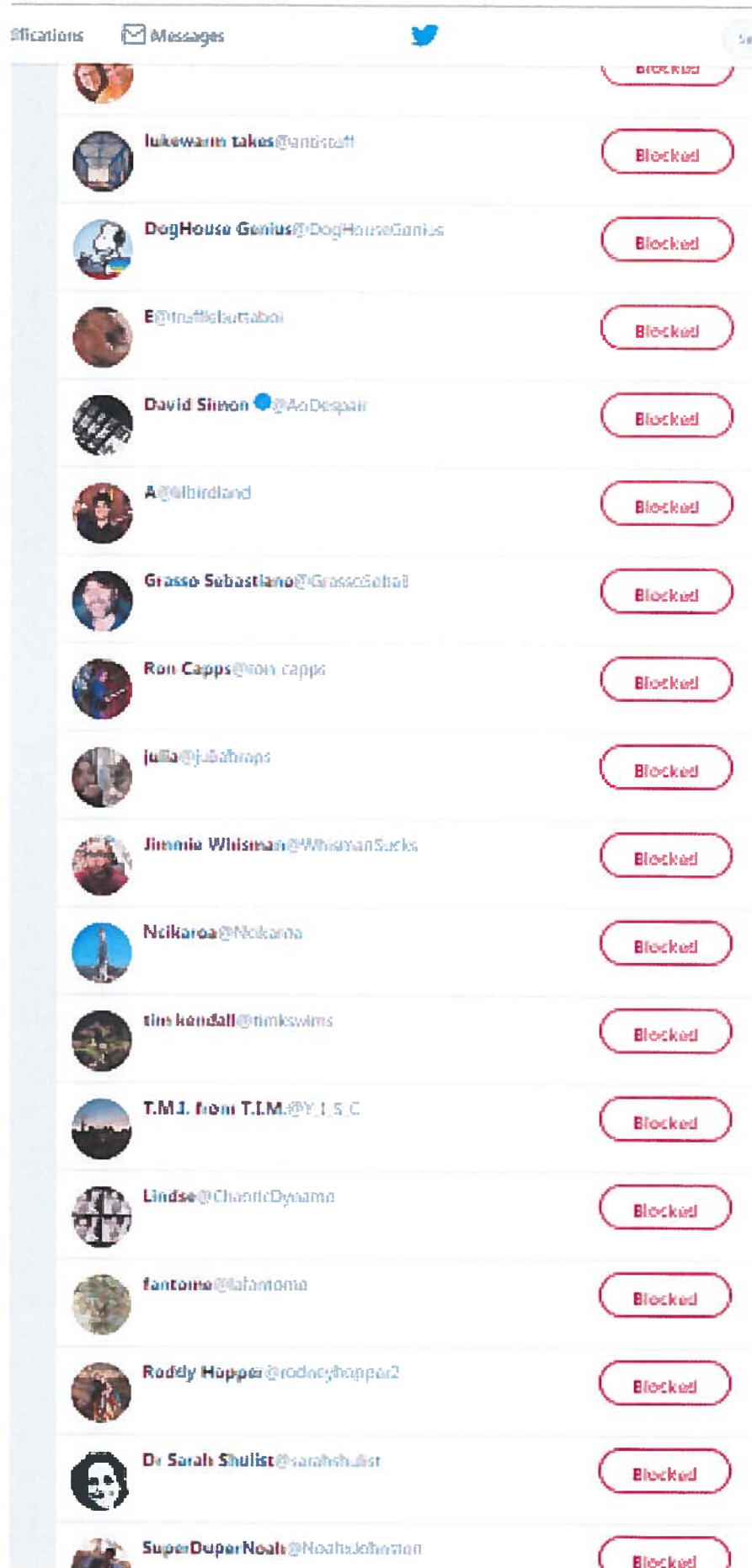
	Skyler @SkilberNuu	Blocked	100
	Quinn Burns @qpburns	Blocked	100
	Queen @blackstar2367	Blocked	100
	@rSimian @RogersMarPromCo	Blocked	100
	Beth Macbain @BethMacbain	Blocked	100
	Rags Morales @RagsMorales	Blocked	100
	Mike @roseystavros	Blocked	100
	Kelle Good @kelle_good	Blocked	100
	yogunking @yogunking	Blocked	100
	It's Dirk again @MondaysTheDay	Blocked	100
	Jonathan Garner @MSFWJonathan	Blocked	100
	Jeffery Allison @JefferyAllison	Blocked	100
	Halldais @Blank_Mind	Blocked	100
	So Be It @LinkPattlow	Blocked	100
	Sean Klosterman @Sean_Klosterman	Blocked	100
	1st Generation Nephilim @CyromaDemetri	Blocked	100
	Ben Pannluk @Cofortunatedad	Blocked	100


		
	Immakuel quickley @bigmakball	
	Tamduke @cardshaybee	
	SnakeHandlingAtheist @b7badger	
	Derek Rosenzweig @ozzyngkush	
	4 3's & a dunk bitches @Clarky810	
	Seth @sethschönburg	
	Kelosi @KaliSowers	
	MackEia @CARDSALLDAY26	
	New Dad is so tired @JacketDan	
	Bub @BubTackitt	
	Lori 🍷 🍷 @coalsmam	
	Hidley @hidleythepoet	
	Ryan Sasse @RyanSassa	
	needlediva @needlediva	
	Mike usqoD @sunotog	
	bettypants @bettypants	
	Tired Old Man @wabe110007	




















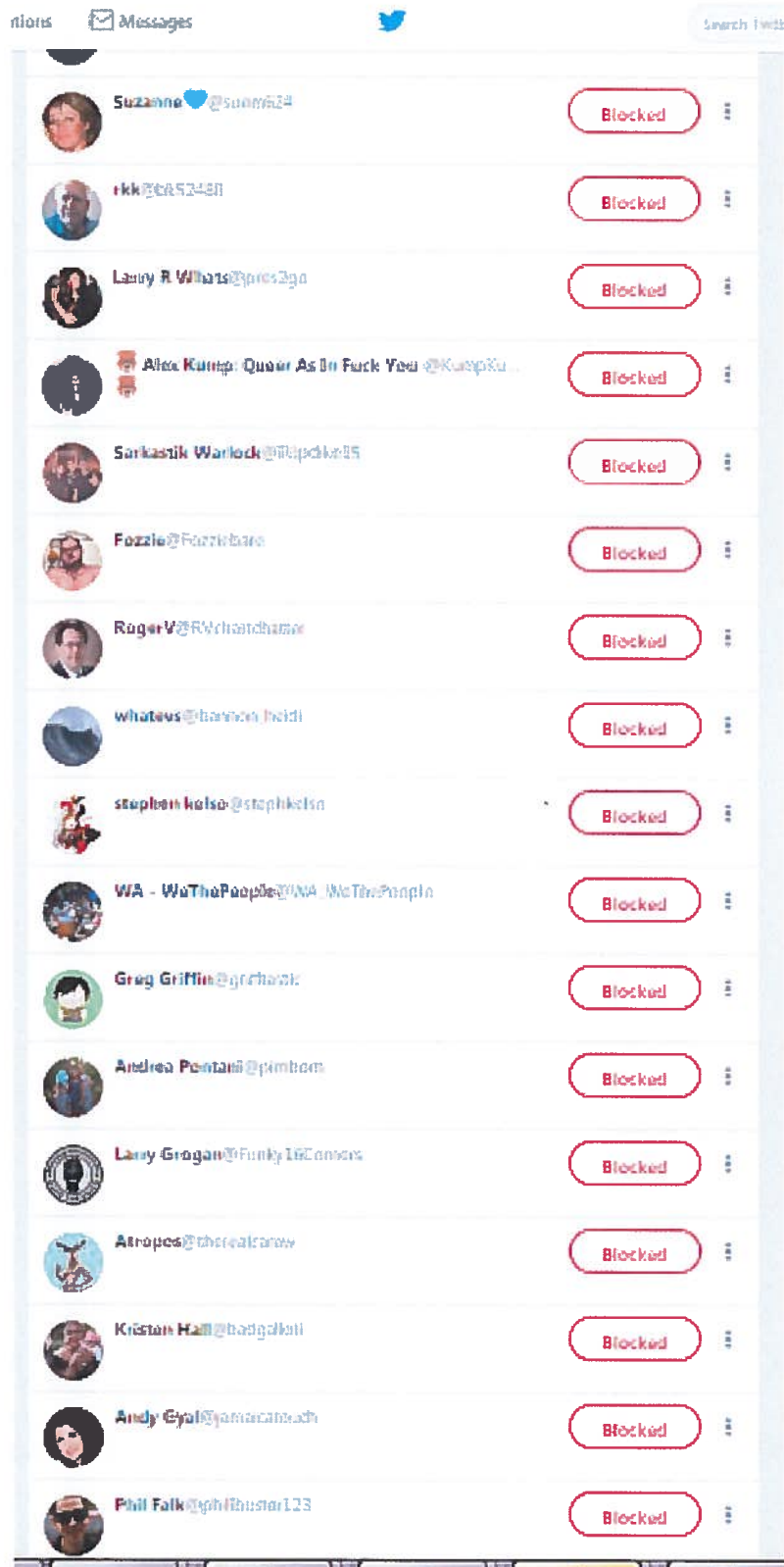


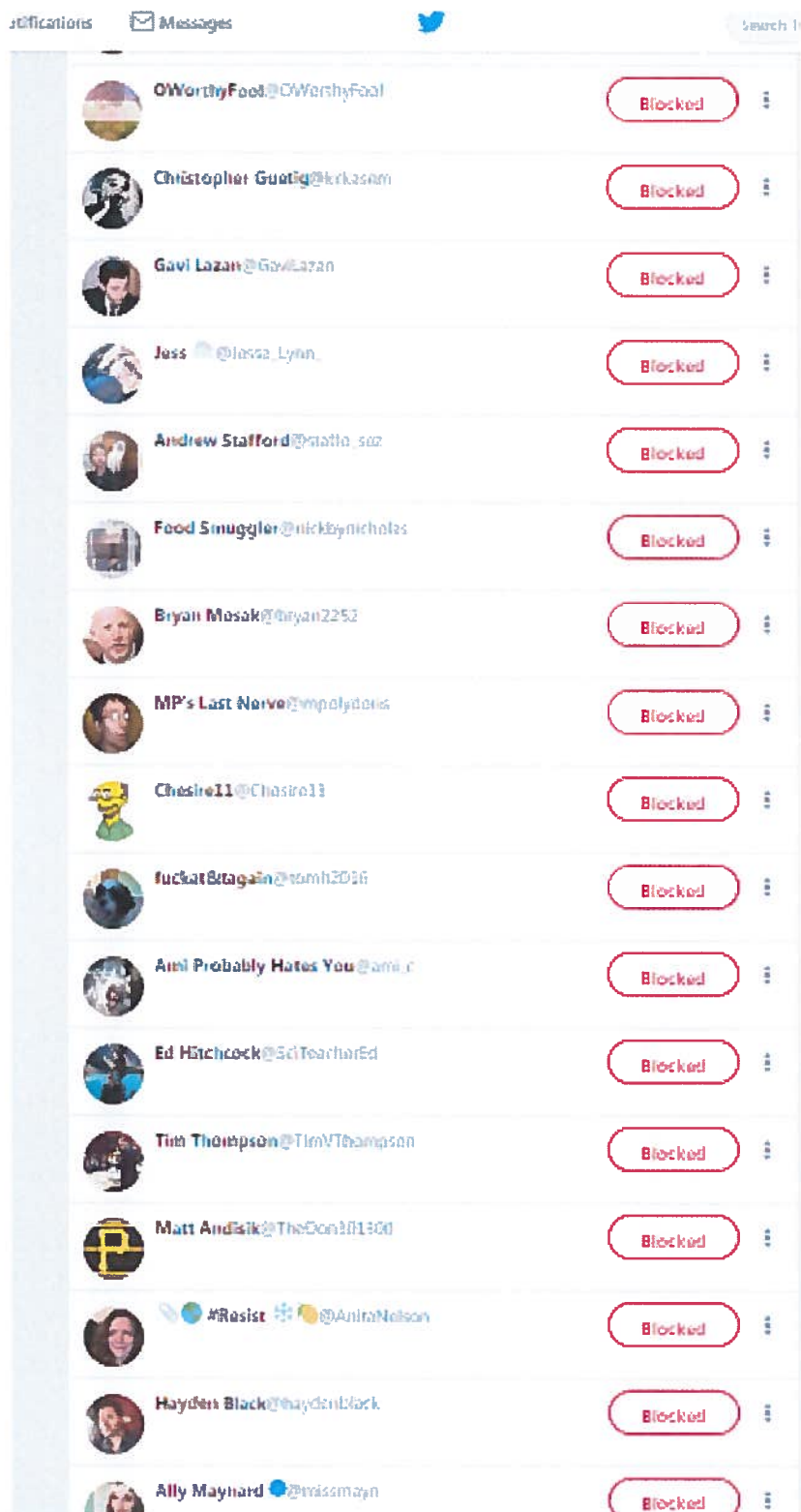


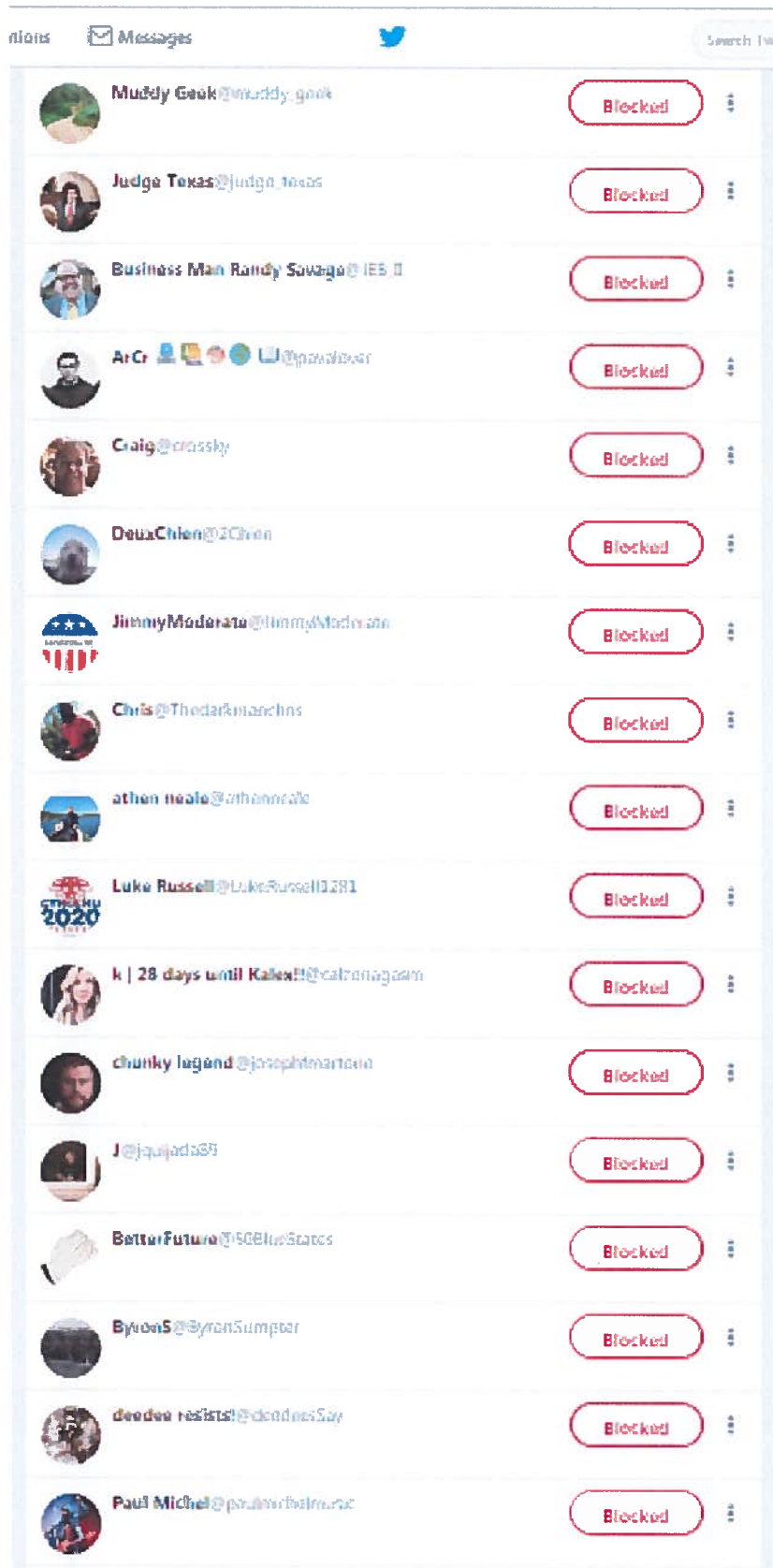





















ations Messages  Search

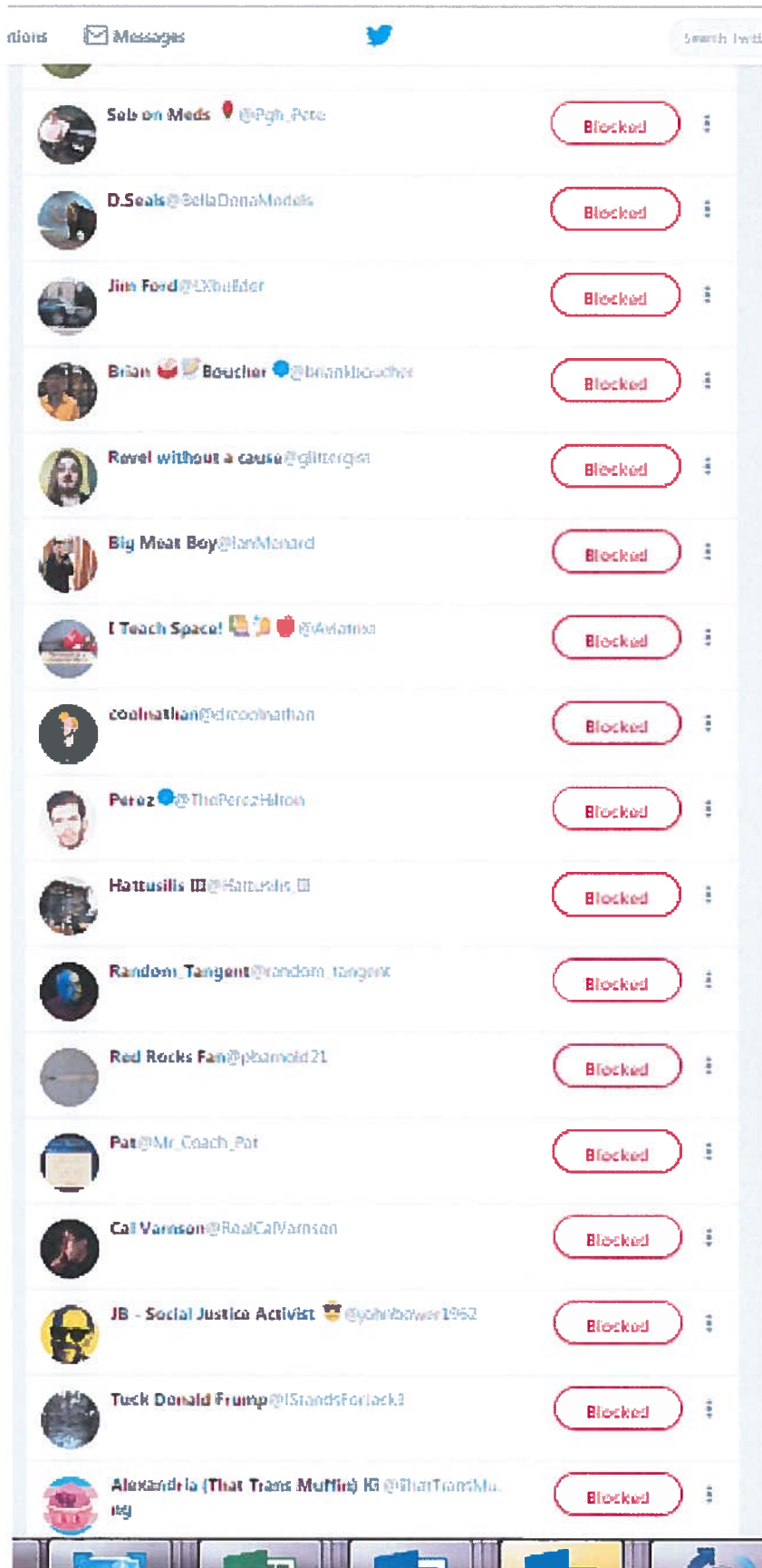
	Kat Rolfschaud @karnowbeashow	Blocked	100%
	Tyler Schneider @DatSchneider	Blocked	100%
	Gloria Erickson @GloriaErickson2	Blocked	100%
	Zack Abrams @ZaZaTheBonz	Blocked	100%
	Maddie Barry @MaddieBarry8	Blocked	100%
	Allan Scullion @allanscullion	Blocked	100%
	Jeff Wood @jwood4783	Blocked	100%
	David Bearden @vacknoom	Blocked	100%
	kanc2001 @Kanc2001	Blocked	100%
	P.O. @justablurb	Blocked	100%
	Bartman3010 @ HOMEbest @Bartman3010	Blocked	100%
	Ian Brickley @ianbrickley	Blocked	100%
	Steven Camisa @spamangolfer53	Blocked	100%
	Scott Matheson @madhesanscott1	Blocked	100%
	MuellerTimePlatypus @Platypus	Blocked	100%
	Jeagan Says Tick Tock @jeagansays	Blocked	100%
	Pat Bigman @PatBigman	Blocked	100%

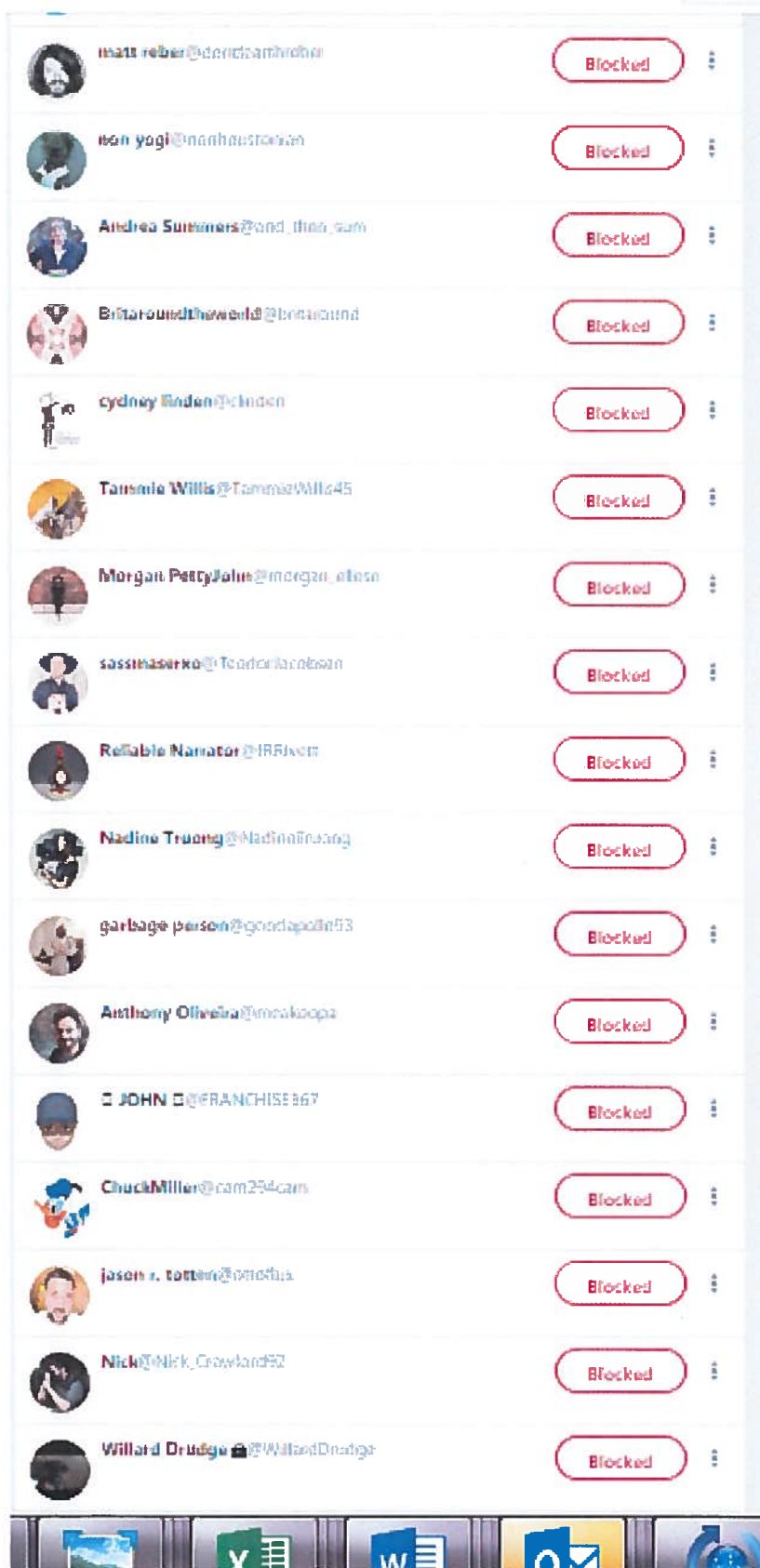

























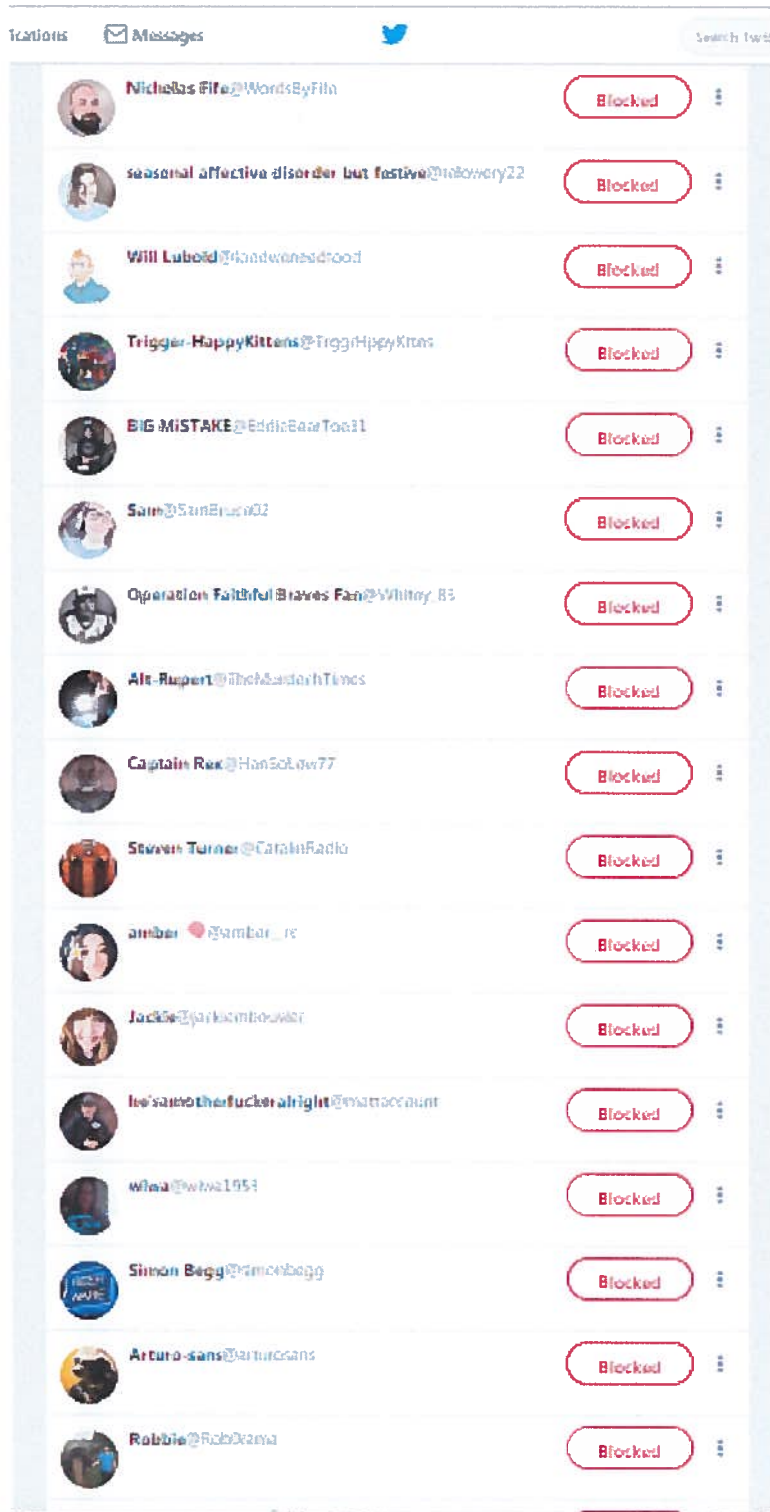
Twitter	
Home	Messages
Search	
	
 Anthony Schaeffer  @Anthony_Schaeffer	Blocked
 Francis Futurama @smallhusk	Blocked
 Creepy Tom Brady @creepytombrady	Blocked
 Tom Streater @tom_streater	Blocked
 gma @shelly34_gma	Blocked
 John Morse @JMcFilm	Blocked
 True BillyD @billyd	Blocked
 Sense @__Sense__	Blocked
 Nuba With A Bowl @RunningOnGrass	Blocked
 Kanton Vance @Kanton_Vance	Blocked
 armadillo @armynamadillo	Blocked
 Mel Mel @NotesFromMelMel	Blocked
 Forrest Hanson @gumplr	Blocked
 C. Taylor @TheClaudeTaylor	Blocked
 Annette Sarraille @Giantpala12	Blocked
 Debora Gregori @Debora_Gregori	Blocked
 Marcia L. Mason @Smason2026L	Blocked























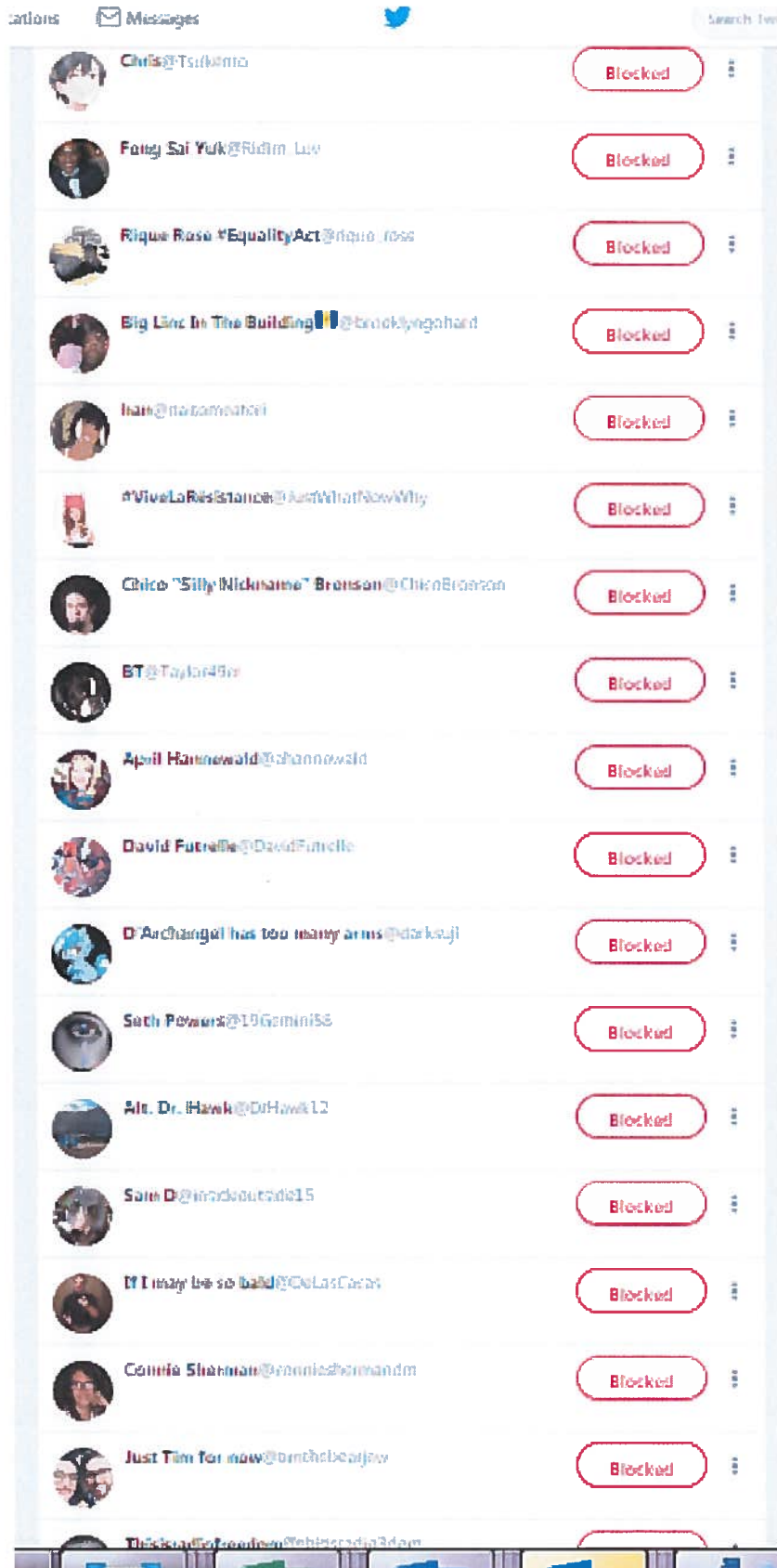
Notifications Messages  Search


















		Blocked	
	Jay Sully @jaysully	Blocked	100
	Bojangles Fats @BRTCCassBB	Blocked	100
	Williams @Pawhida	Blocked	100
	Anthony Tony M @wwwbagganish	Blocked	100
	St. Julrick @StJulrickhan	Blocked	100
	Connor Collins @connorec011s	Blocked	100
	Sarah Ferguson 🍌 @sargunthir	Blocked	100
	Kimberly Gilbert @kimberlygilbert	Blocked	100
	Fats "Speed" Johnson @Fats Johnson	Blocked	100
	Lady pants @jannetp	Blocked	100
	Fat Hayyyy 🍌 @FatFat	Blocked	100
	Susie Sander @mudazyy	Blocked	100
	RB Fast @AggucationMama	Blocked	100
	Buckford Buckingham III @BuckingtonIII	Blocked	100
	Anthony Preziosi @AJPreziosi	Blocked	100
	anigom2007 @anigom2007	Blocked	100
	Nicholas Fife @WordsByFife	Blocked	100




















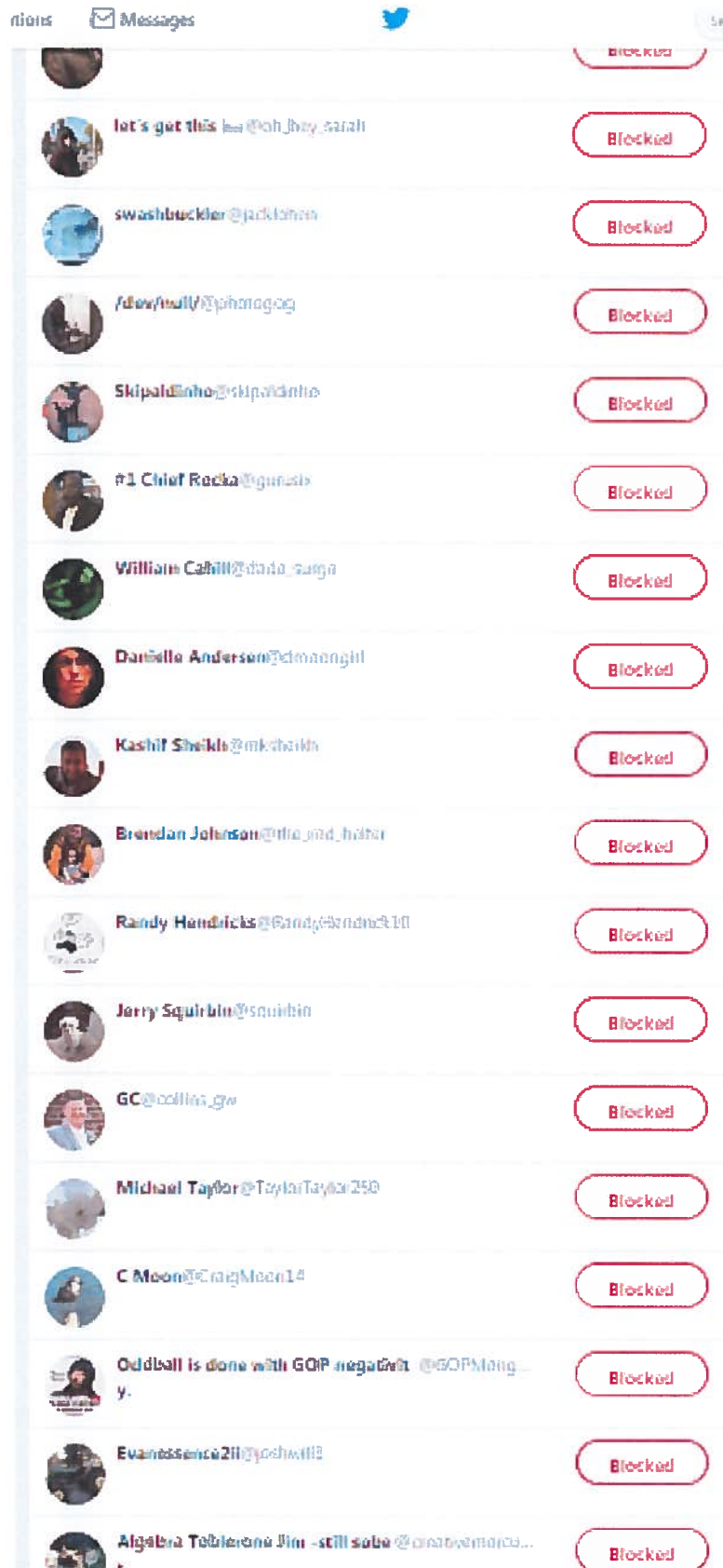


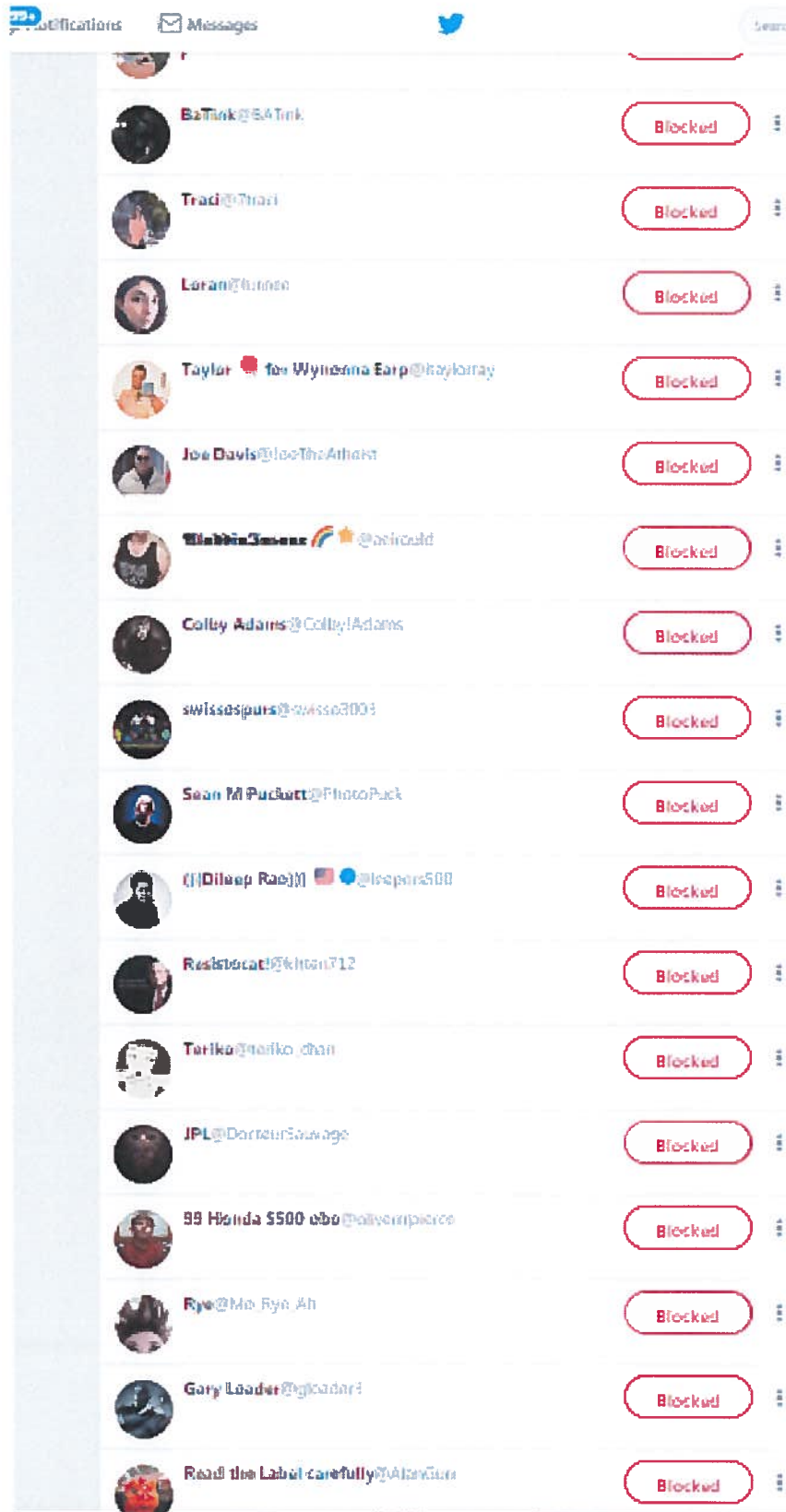
		
	Tina @tinaramos	Blocked
	Robby DeFazio @robbydefazio	Blocked
	Sadie O'Malley @OMalley_HG	Blocked
	Annie Griggs @chrisgriggs	Blocked
	Wondararrot @Wondararrot	Blocked
	Paul Hobbs @phobbsgriffin	Blocked
	LAB Politics @LABPolitics	Blocked
	Used To Be GOP @UsedToBeGOP	Blocked
	Bob @BTWCMD07	Blocked
	Terry Reich @tdb7768	Blocked
	Chris Mac @bigmacmcmety	Blocked
	My Tweets Real AF @JCMrMugantWares	Blocked
	Dominick Rucubster @SocialismGood	Blocked
	Robert @ibamaheya	Blocked
	Erich Wellinger @data_Sunk	Blocked
	Critical Mass @RadicalopNM	Blocked
	kat @Katie_Gryn	Blocked

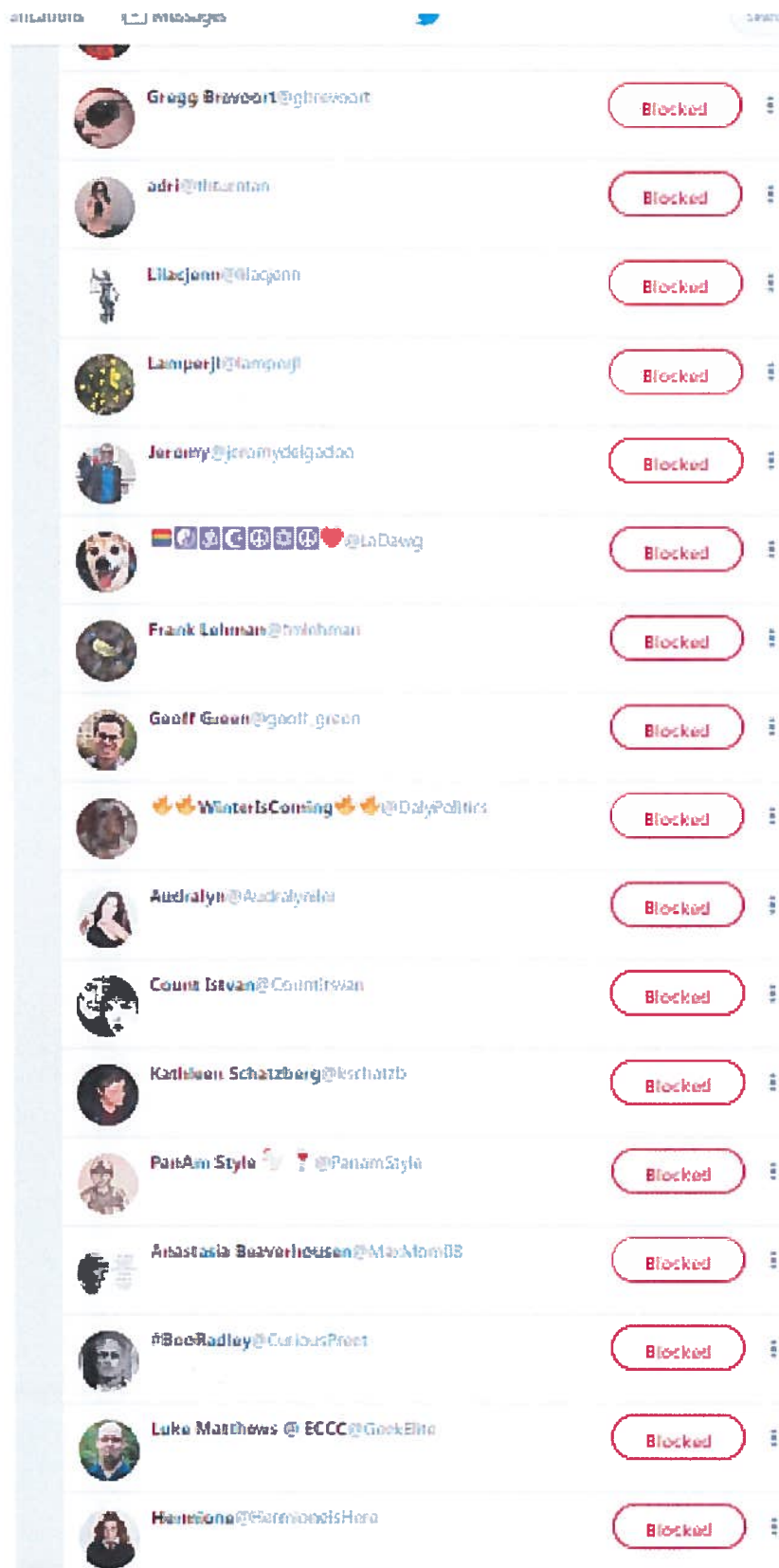


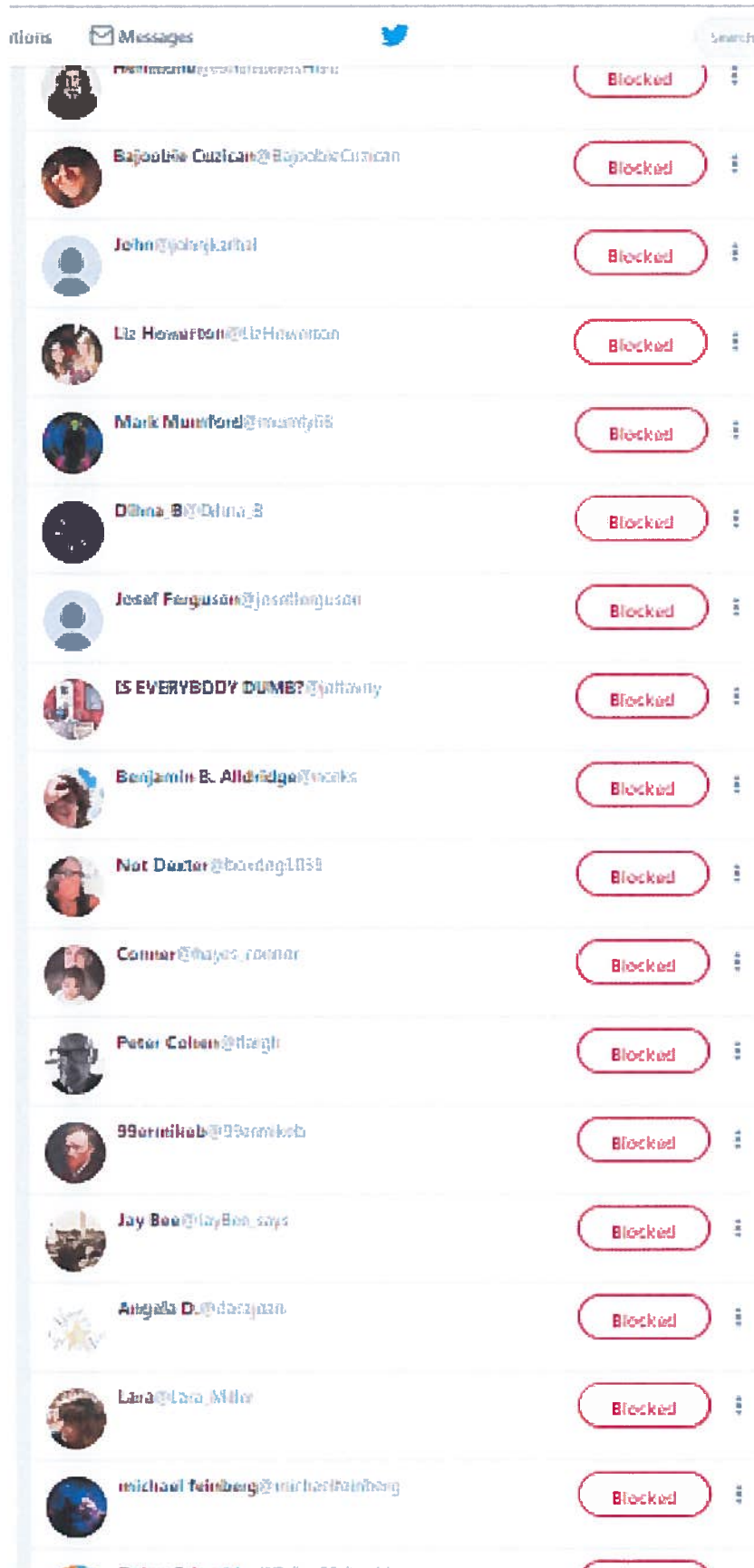
	ThisIsRadOfFreedom @thisisradofreedom	Blocked
	✨ Odin Hjaldrgeod ✨ 🌿 @OdinWaltha	Blocked
	YesBiscuit, Yes Collusion @YesBiscuit	Blocked
	mynameisJaff @HeadIsLegend	Blocked
	Matt Klingler @mattk12	Blocked
	Erik 📡 @Zaps80	Blocked
	Susie @SusieWeb	Blocked
	Ben Stanley @BDStanley	Blocked
	🇺🇸🇺🇸🇺🇸🇺🇸🇺🇸 Respecter 🇺🇸🇺🇸🇺🇸🇺🇸🇺🇸 @zaps71a	Blocked
	Aku Kutsa @donaka12	Blocked
	truth @_Site_mine_	Blocked
	Forrest Brakeman @forrestbrakeman	Blocked
	DJ Capobianco 🇪🇺🇪🇺 @djrap	Blocked
	Matthew @MattFromMKE	Blocked
	Max Dionne @MaxDionne	Blocked
	Kimberly (RESIST)@Kmich718	Blocked
	John Lease @jlease717	Blocked


















	Rebecca Bayle @Reber809	Blocked	...
	d @aquariusprusey	Blocked	...
	Elspeth H. @papevannour	Blocked	...
	In Mueller 1 Trust! @cheerleaders	Blocked	...
	Captain Dan @Captain_Dan55	Blocked	...
	Col Matheson @220maths	Blocked	...
	Spencer @Spence6913	Blocked	...
	The TBR Stack @Fogus57	Blocked	...
	Toni @hamdwood	Blocked	...
	Nate Daniels @NateTDaniels	Blocked	...
	Add your name @goballaw	Blocked	...
	Susan KnierHemen @KnierHemenSusan	Blocked	...
	Maureen Randolph @MaRandolph130	Blocked	...
	scott klink @therealklink	Blocked	...
	maddy @maddyymkls	Blocked	...
	NaXiGeNx_YaTi @ic_yan	Blocked	...
	Jamal @TheJMA35	Blocked	...

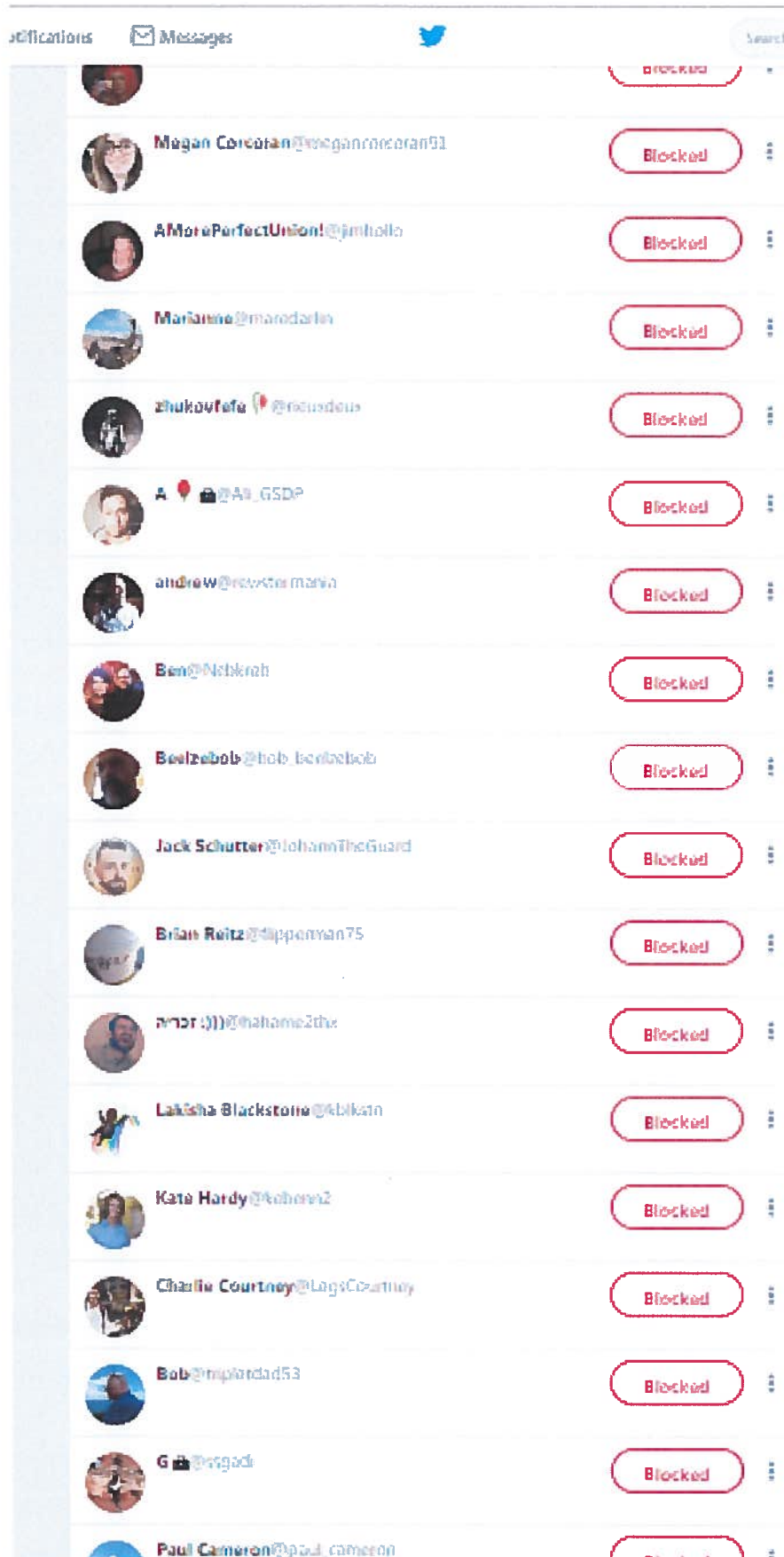


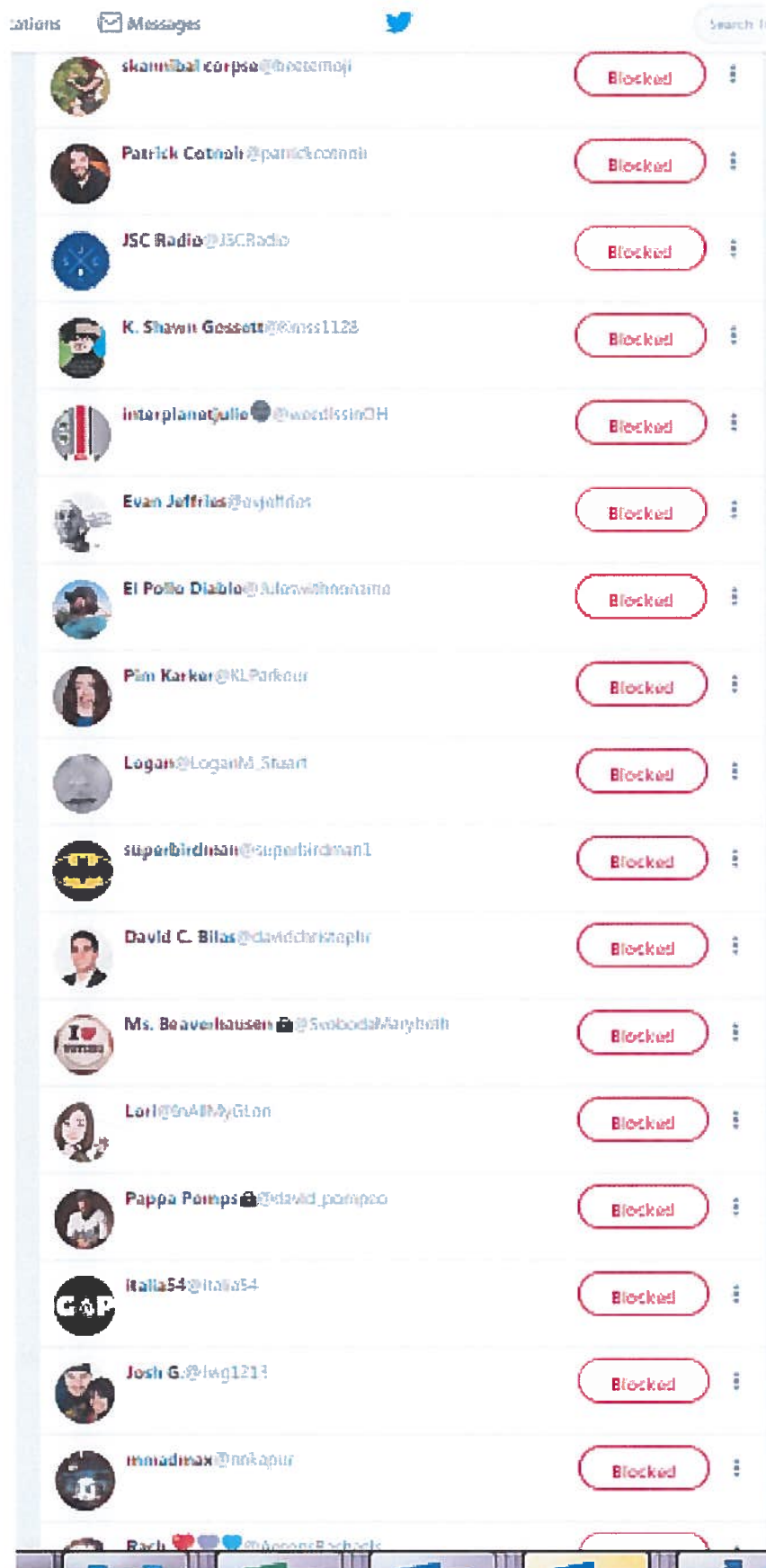




























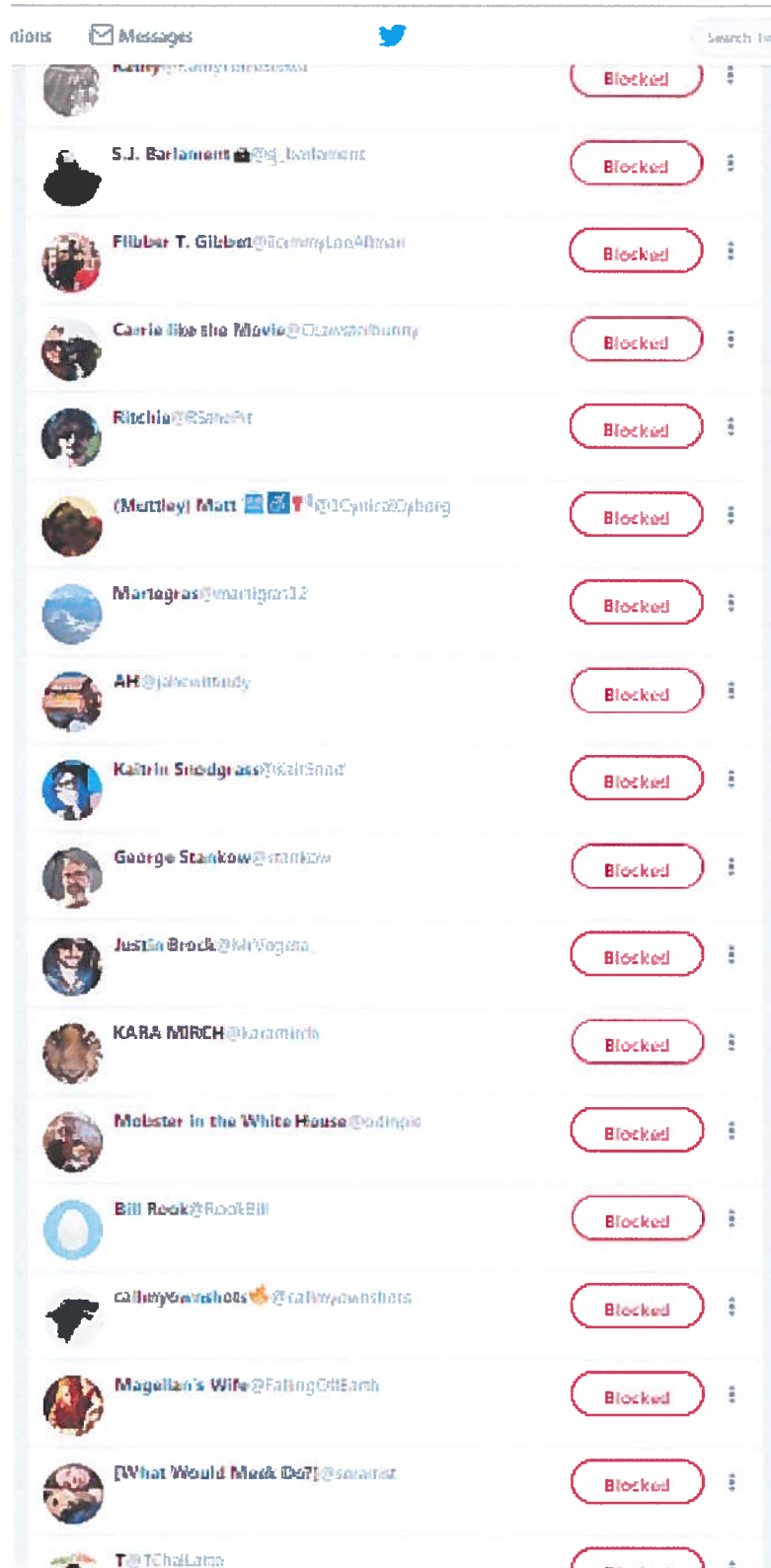


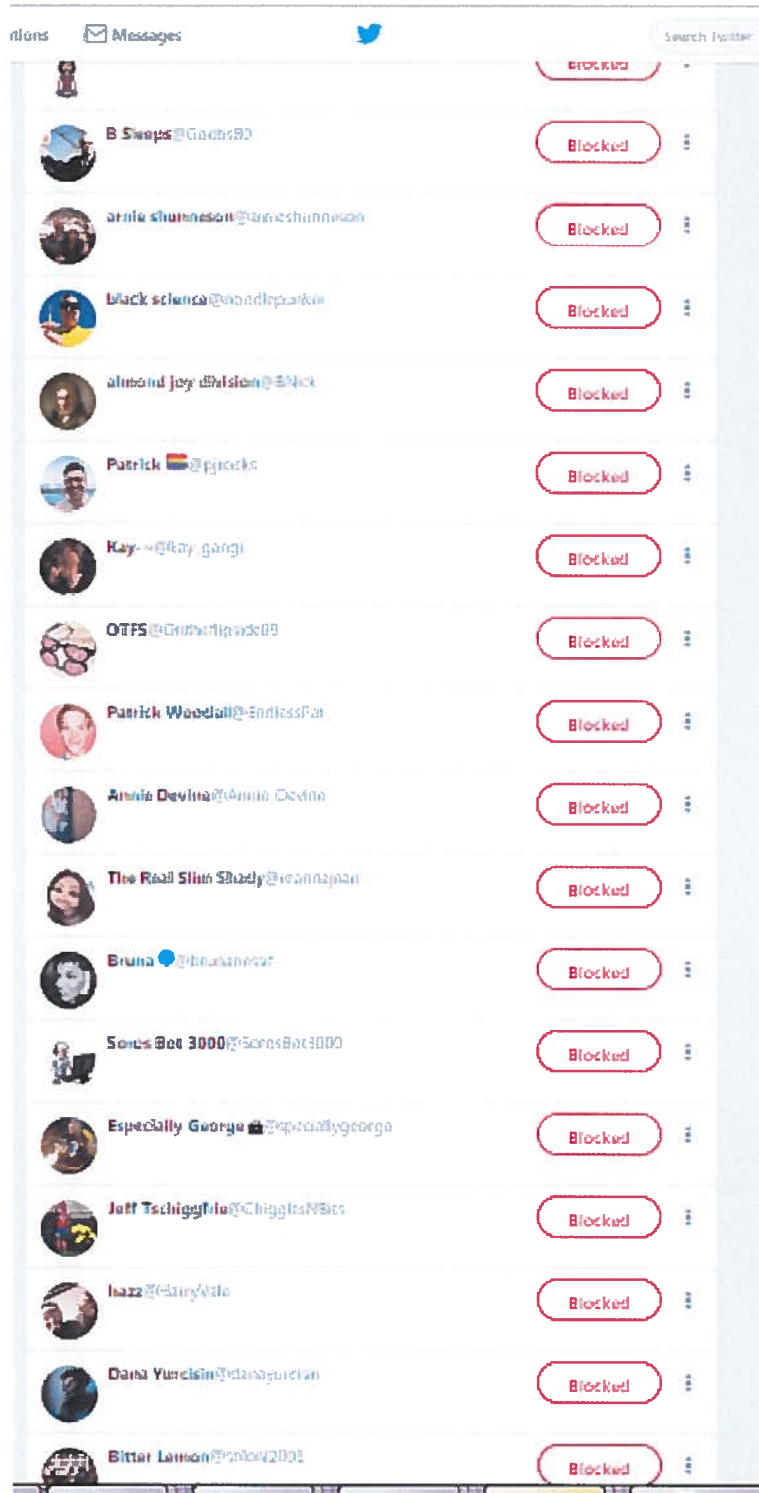
	Debra Schneider @DebraSchneider	Blocked	100
	The Critic @The_Critic	Blocked	100
	Joel Kasnetz @kasnetz	Blocked	100
	Justin Pitts @mjasonpitts	Blocked	100
	Pandora Pushback @PandoraPushback	Blocked	100
	dighead @the_blonnes	Blocked	100
	Steve Glenn @steveglenn	Blocked	100
	Tim D'Neill @ah_birdwatchers	Blocked	100
	Commanda Joe @joejhoganmatt	Blocked	100
	NinjaMardion @NinjaMarion	Blocked	100
	Tracey P @macyspoo5	Blocked	100
	Arnan @ArnanNZ	Blocked	100
	Old Kentucky Shark @Kentucky_Shark	Blocked	100
	T VanSeest @tavisabrooks	Blocked	100
	Frank van Schie @nabulous_nl	Blocked	100
	Savannah Catrine @Savannah	Blocked	100
	Weapon X @hogsfunny	Blocked	100

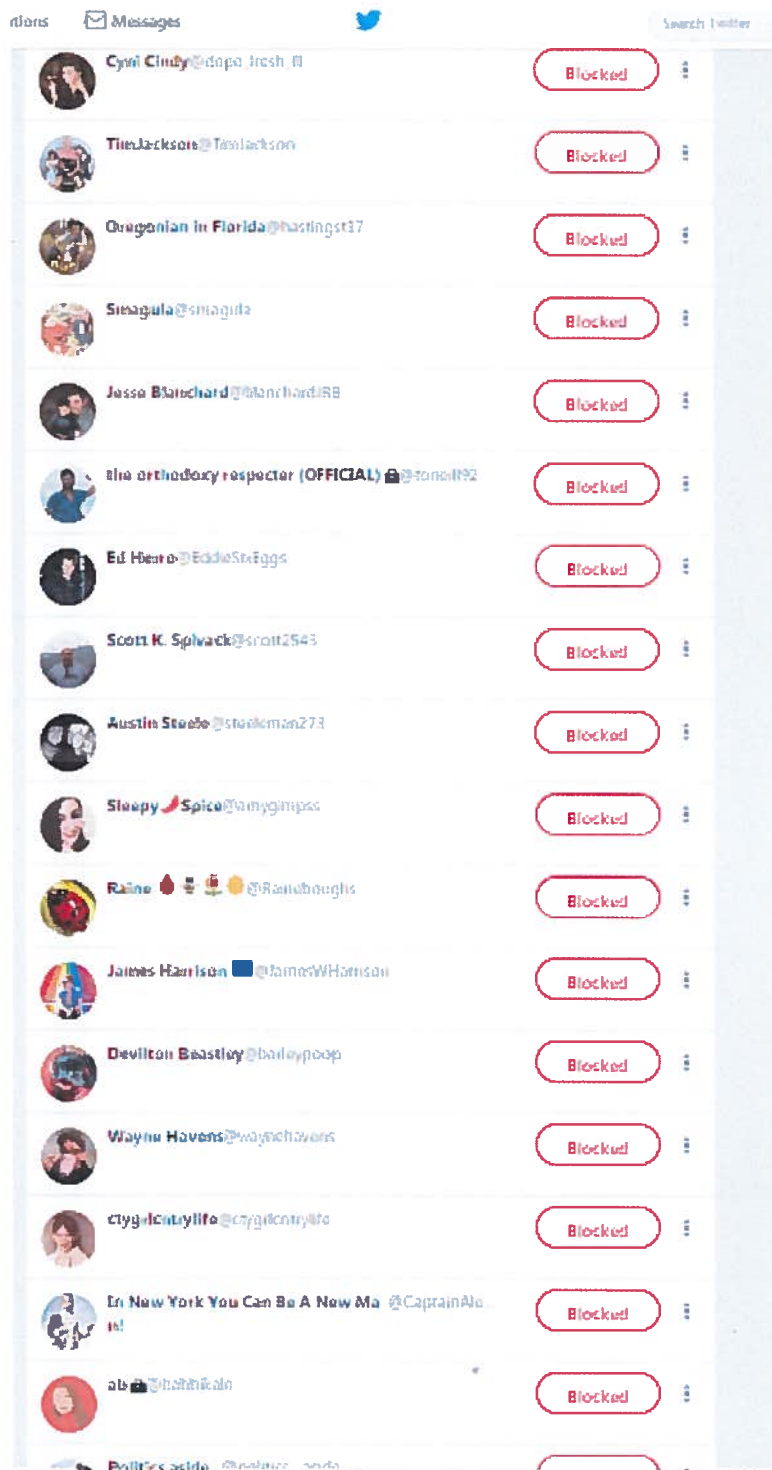




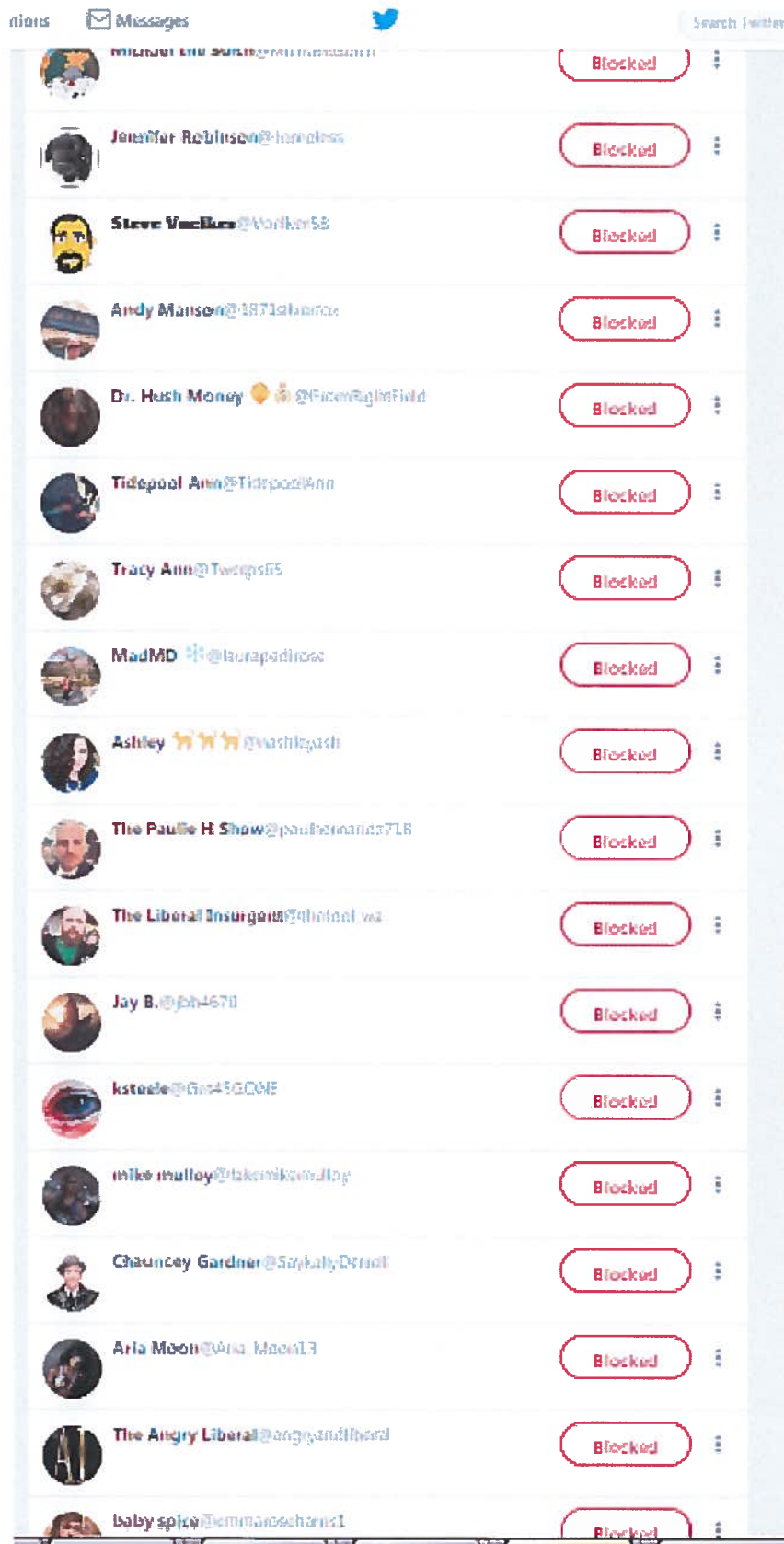
	Rach    @AesapsRachael	Blocked	489
	Pharband @PharSand	Blocked	489
	corb450 @BeanBagChairBob	Blocked	489
	Elizabeth Moon @emoents	Blocked	489
	TR @ThaneMarR	Blocked	489
	Stupefaction Music @karamboogaloo	Blocked	489
	Caro @ckmaughan	Blocked	489
	Warriormuse @liberalmusing	Blocked	489
	the real MKL @MKR125450	Blocked	489
	Julie Rada @julie_rada	Blocked	489
	DavidL @Vofotanime	Blocked	489
	brady @vonnathbrady	Blocked	489
	Sugar Tits  @PiggyShitCock	Blocked	489
	Del Shores  @DelShores	Blocked	489
	Meg Smith   @VandyMog	Blocked	489
	Flat Death Star Society @RLKay86	Blocked	489
	Kathy @KathyTaraStewart	Blocked	489

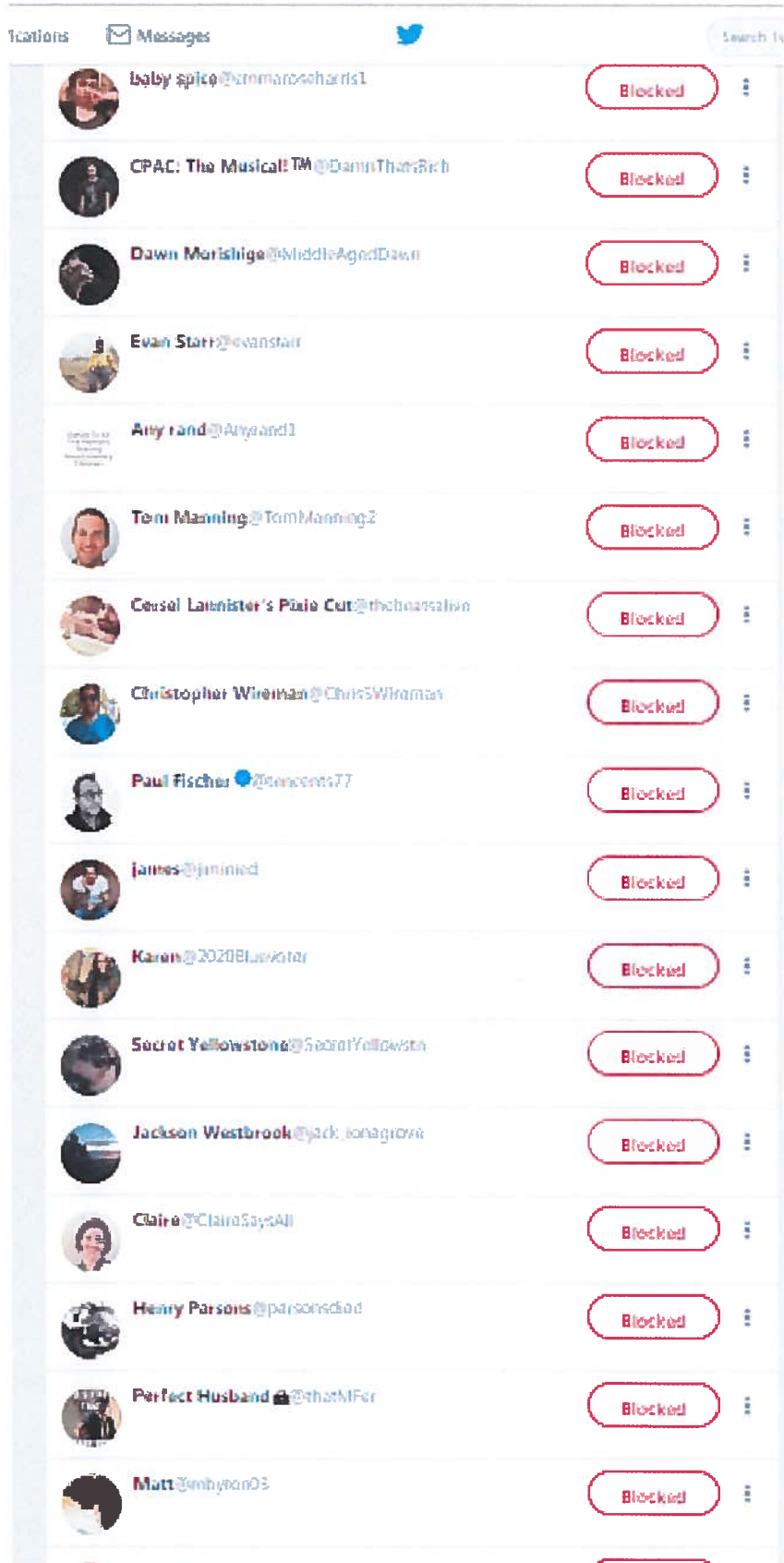


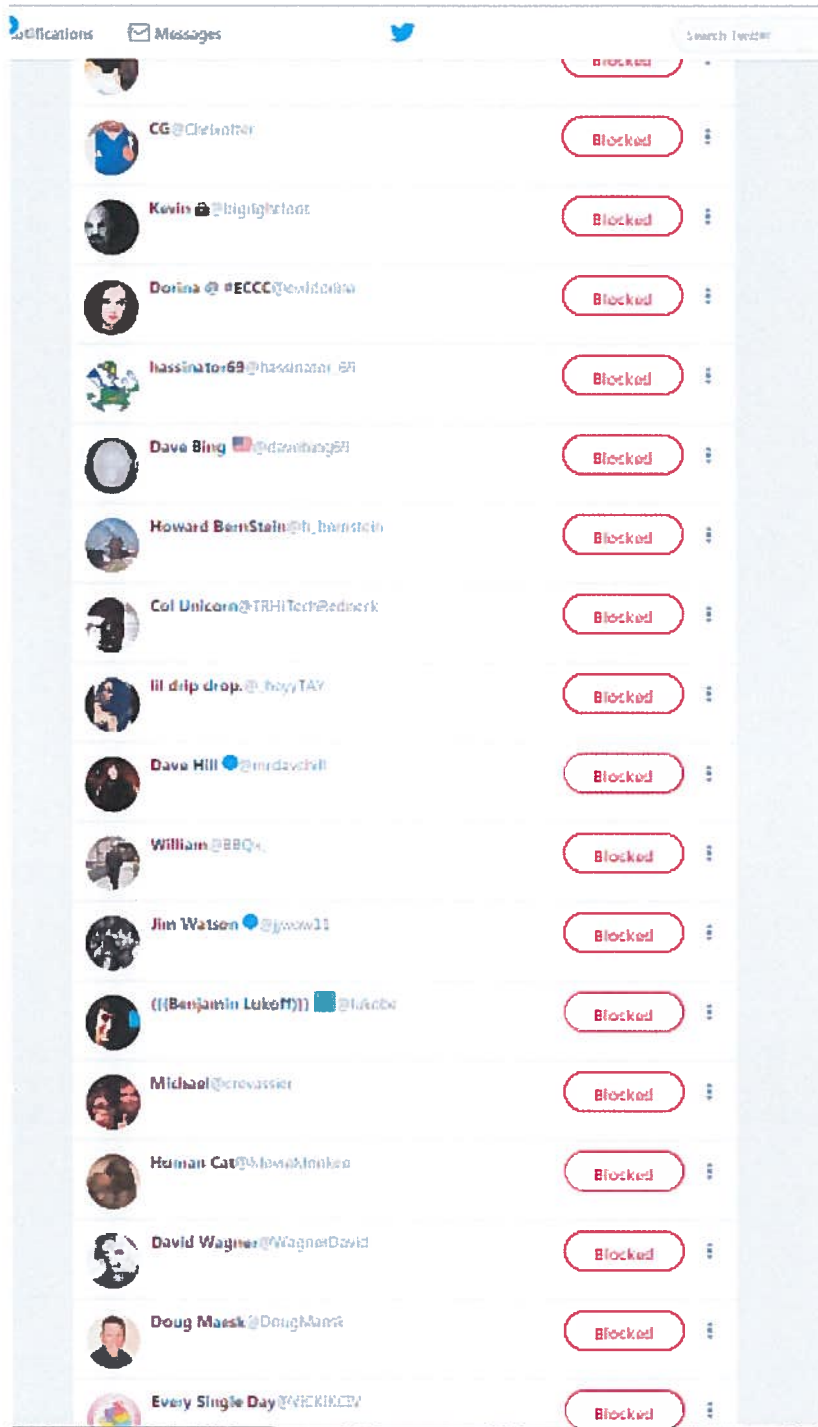


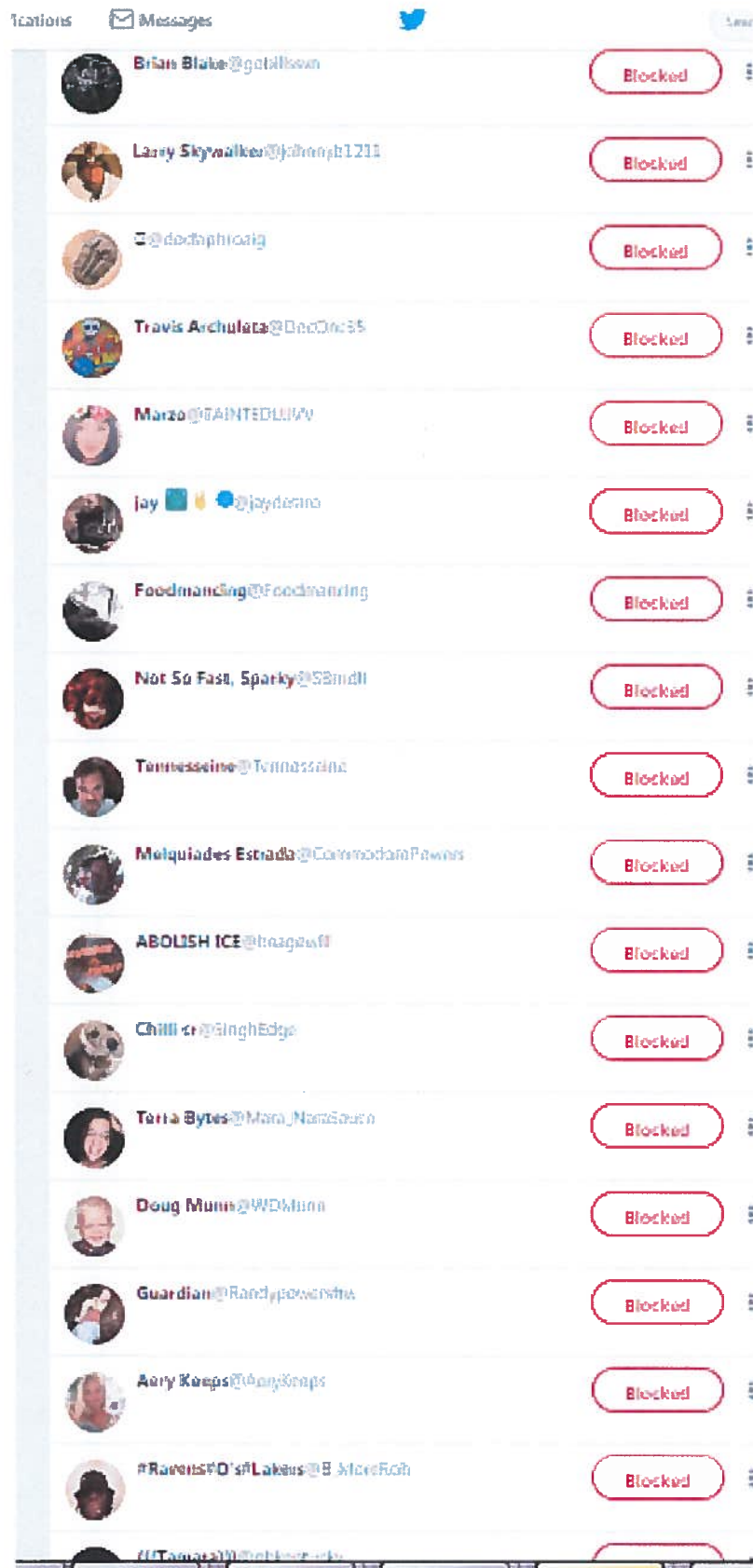



















	Politics aside...@politics_...ada	Blocked	100
	Jeffrey Labowski@PenguinLast	Blocked	100
	and now.@ChavezIsBored	Blocked	100
	Luna Barnes@BarnsLuna	Blocked	100
	Benjamin Nason@Benjamin_Mason	Blocked	100
	Karén @pietoyamalia	Blocked	100
	alux@AlxFreed	Blocked	100
	CK@charley_ck14	Blocked	100
	@tkgun3 Queenoftwits #thuglife #Capet@tkgun3	Blocked	100
	Jonathan@Kaz_Darkson	Blocked	100
	Jane Sparks@span9er	Blocked	100
	Renee Hooray@ReneeHooray	Blocked	100
	Shannon Brown@shbrown2011	Blocked	100
	Delilia O'Malley@DeliliaO'Malley	Blocked	100
	Sarah Hack@sharahack	Blocked	100
	Humpty Dumpty@Mahstar_Sauce	Blocked	100
	Michael the Suick@MichaelSuick	Blocked	100

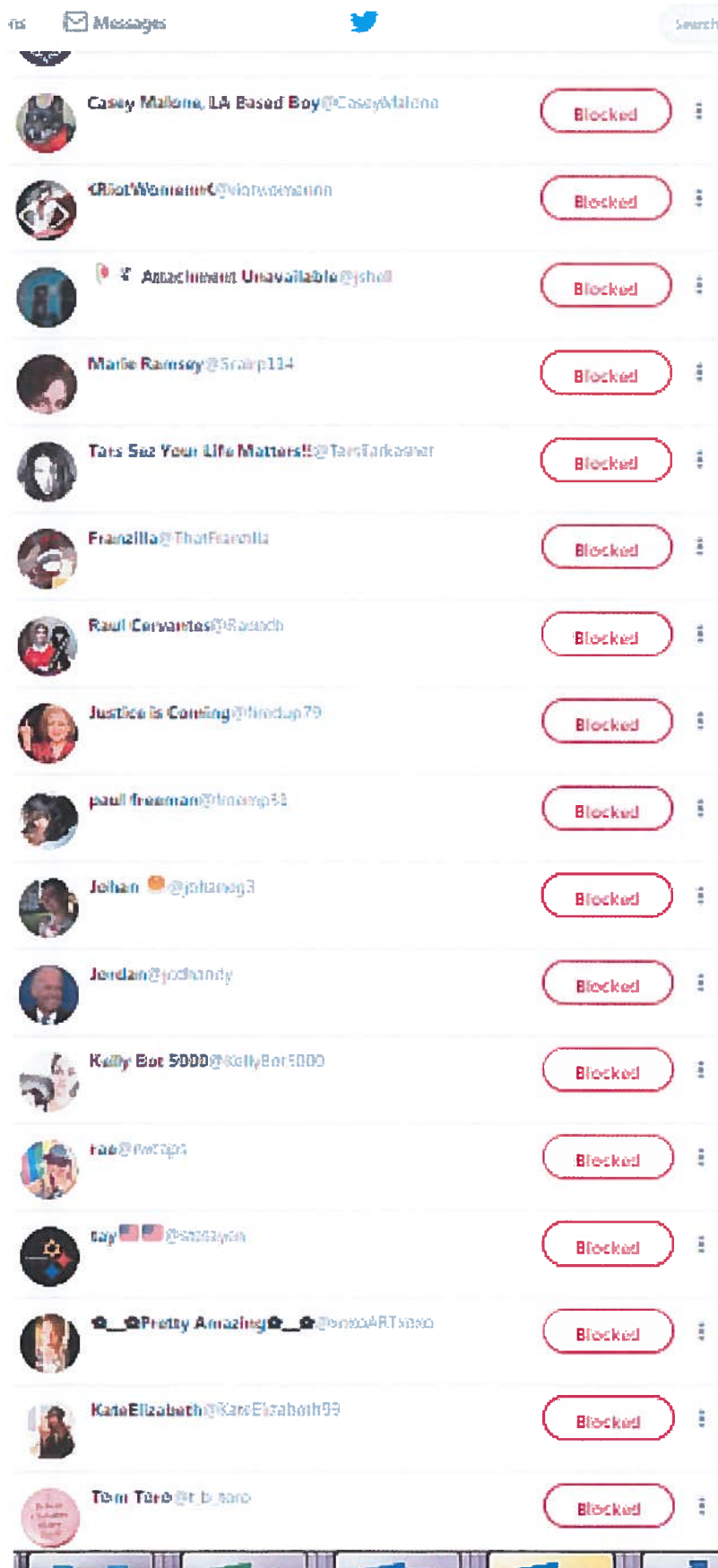

























	@RobLobus @E_MoreRob	Blocked	100
	@Tamaral @phkentucky	Blocked	100
	Craig Promise @CraigPromise	Blocked	100
	Lee @LeeBy00	Blocked	100
	seanmiley @seanmiley	Blocked	100
	who did this? @heretocough	Blocked	100
	Ed Castillo @ItsProouncedEd	Blocked	100
	Mike Johnson @mjohnson1000	Blocked	100
	Benton Alce @BentonAlce_NYC	Blocked	100
	BPatt @bpatt1015	Blocked	100
	Amelia B @amelias200	Blocked	100
	Toni @Lakotamz2	Blocked	100
	Zach Mullis @zwmullis	Blocked	100
	Liam Reid @freddy57	Blocked	100
	OpChris Pine @TheShaneLennon	Blocked	100
	Gabby Rowlls Lugs @gabbyrowlugs	Blocked	100
	Charles Freels @GamblerGing5150	Blocked	100

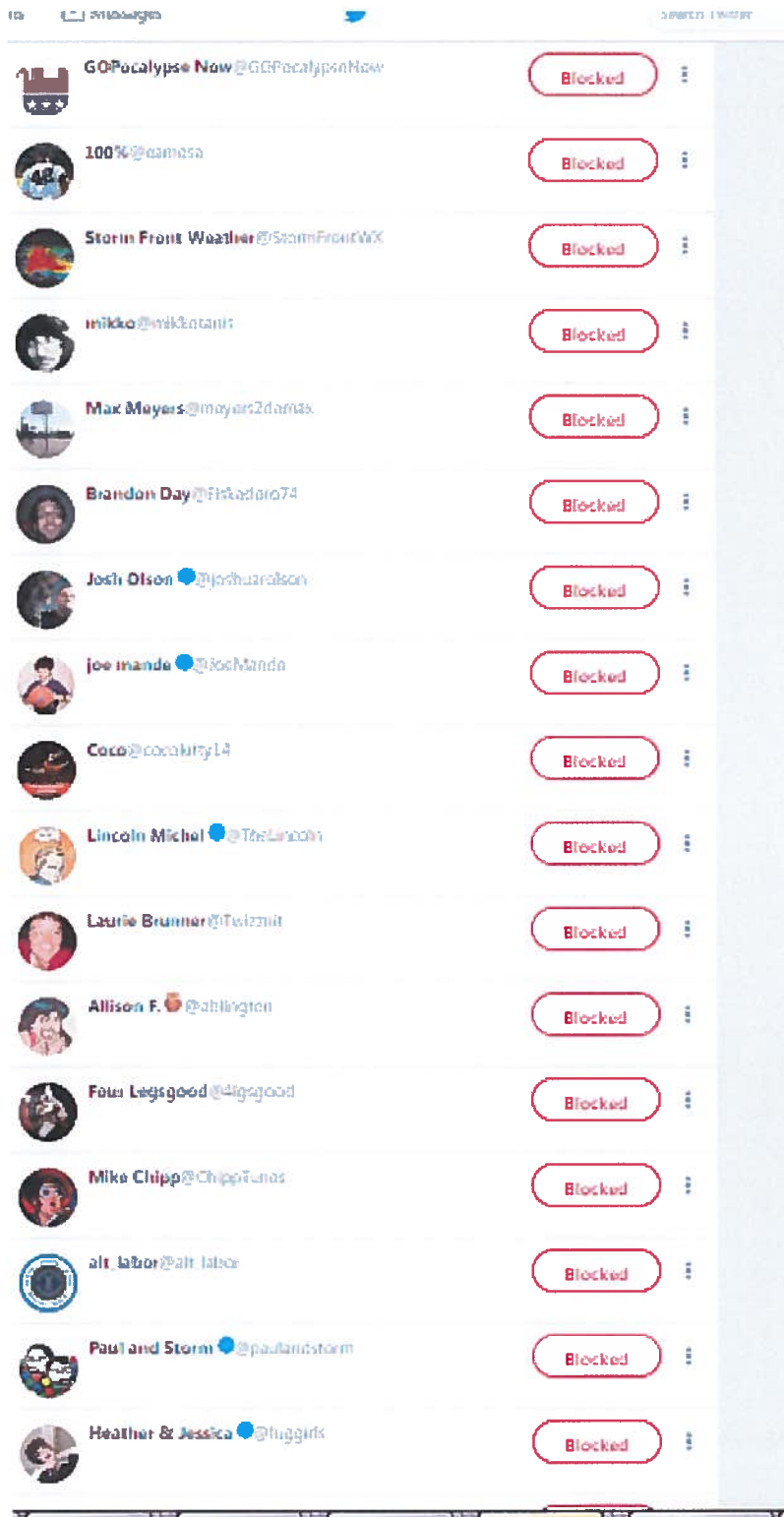


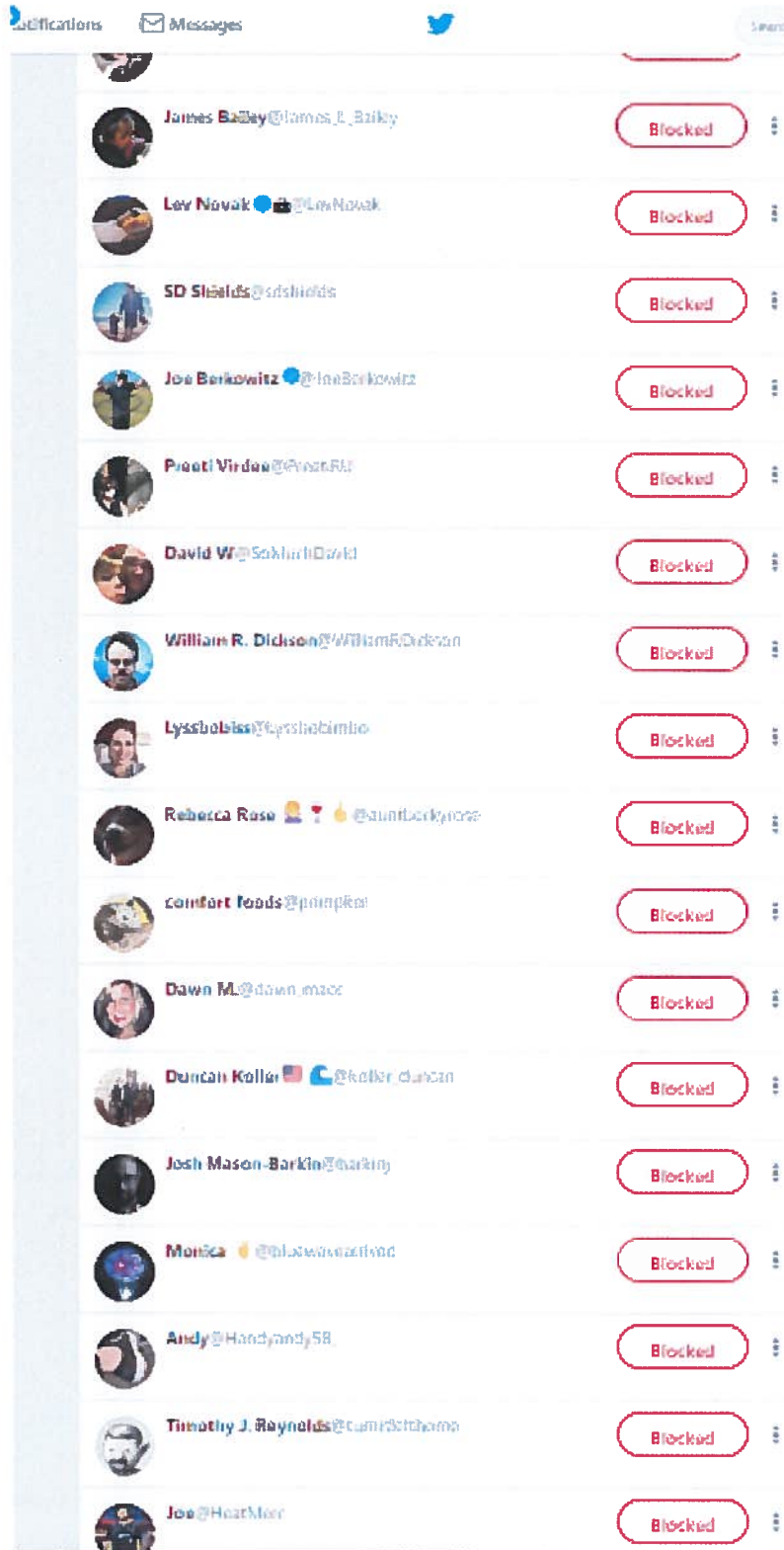
5


















Messages




















Search tweets

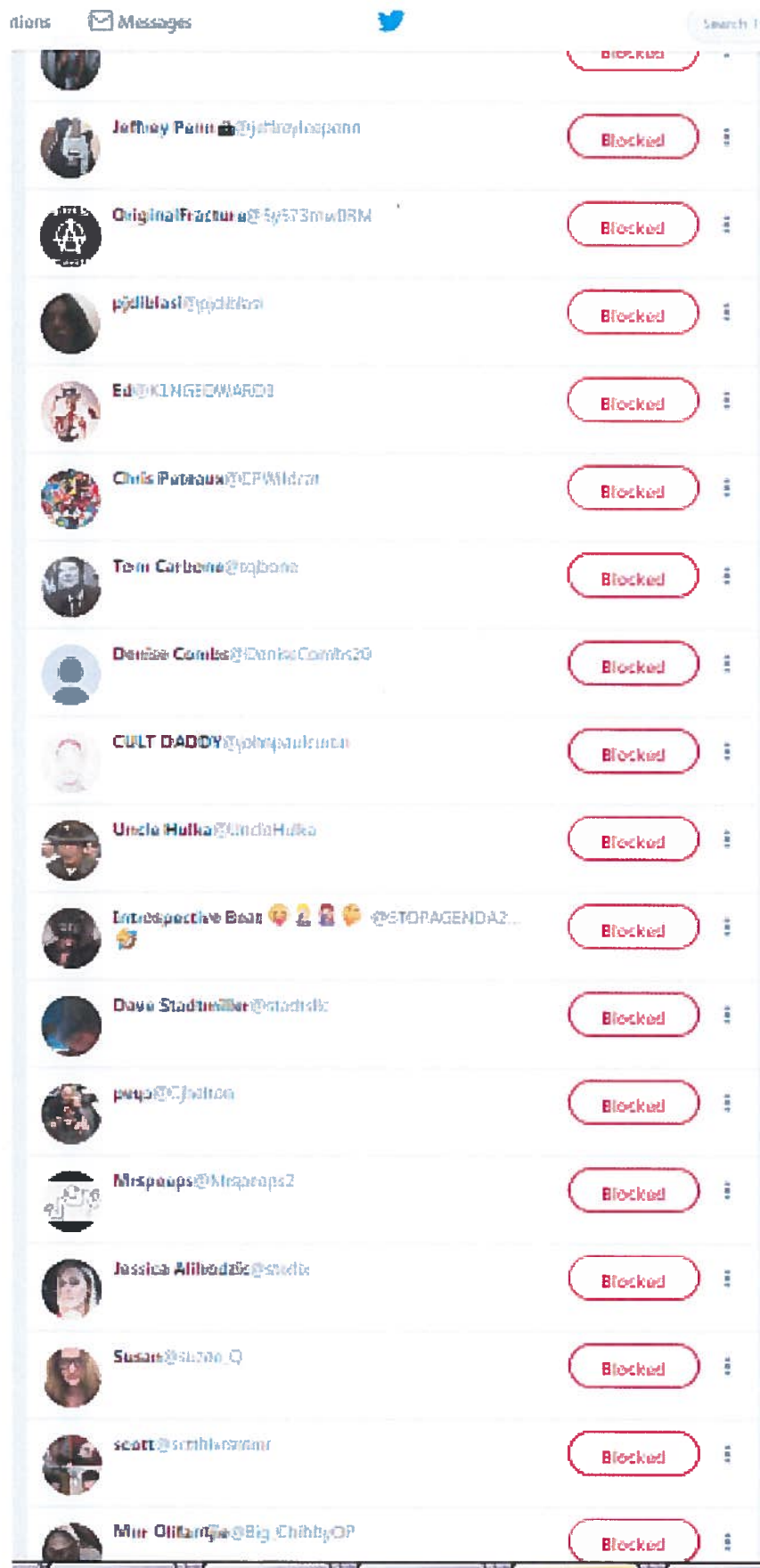
	Tim Doyle C2E2 booth #268 @NakatomiTim	Blocked	100%
	Lewis Andy Warner @bdfreedom	Blocked	100%
	LIB OWNER @TKCANY	Blocked	100%
	Will Powers GDC @WillPowers	Blocked	100%
	Bill @Bill E Cloud	Blocked	100%
	Banker by Day @banker_by_day	Blocked	100%
	CeJack Smack @drunkass78	Blocked	100%
	Bryan the Intern @BryanththeIntern	Blocked	100%
	Bobo Doobie @BoboDoobie	Blocked	100%
	David Call @davidscall	Blocked	100%
	J. P. Dalling @jpdalling	Blocked	100%
	Tim @Pammy_Flowlers	Blocked	100%
	Mr. Umbrella Man @gavinesq	Blocked	100%
	Nick @waggle31	Blocked	100%
	C. Monkey @Quawoyoda	Blocked	100%
	Molly Jong-Fast @MollyJongFast	Blocked	100%
	Brian @redburnedbird	Blocked	100%





















	i recognize myself@imandilydaho	Blocked	389
	ralph brown@RalphWJBrown	Blocked	389
	Lori@lwanstammala	Blocked	389
	Alicia Lutes@aliciatlutes	Blocked	400
	Child Poisons Are Bad@TerriHanson19	Blocked	389
	Hambender Helper@shannon	Blocked	400
	Zapki@Zapki	Blocked	389
	M. A. Urban, friendly neighborhood pal @mascos ... ecocologist	Blocked	389
	EnoughTrumpSpan@enoughtrumpspan	Blocked	400
	Adam Goldstein@thazdamgoldman	Blocked	389
	oh word?@ohwordminded	Blocked	389
	Furious Optimise@saracoway	Blocked	400
	Sancho@sancho	Blocked	389
	Saint Michael's Soul@SaintMichaelsSo	Blocked	389
	Invidius@TEPInvidius	Blocked	400
	jules redick@julesreddick111	Blocked	389
	Grapesoda aka Petty Wap aka He Who Sees @ca ... Your BS	Blocked	400

	Fake Thad Stevens @fakethad	Blocked	100
	The Fantastic Fausa @fantasticfausa	Blocked	400
	Chris Elkerton @cpelektrn	Blocked	100
	Mike Monteiro  @monteiro	Blocked	400
	William M. Cotter @cotterw	Blocked	400
	Spenser @HezaDorhaWetDog	Blocked	100
	Joey Whitford @joeywhitford	Blocked	400
	GlockChain @GlockChain	Blocked	100
	David Mayo @dcmayo	Blocked	400
	Cannibal Liberal @CannibalLiberal	Blocked	400
	Cameron Lathp @cameron_lathp	Blocked	100
	Dino Goldie @dinogoldie	Blocked	400
	Pratt Falls @PrattFalls	Blocked	100
	Gina Kim @glnabamboo	Blocked	100
	Not Drunk Enough @NotSomeFarbny	Blocked	400
	bassheartsstrings  @bassheartsstrings	Blocked	400
	Michael Bugard @mbugard	Blocked	100





















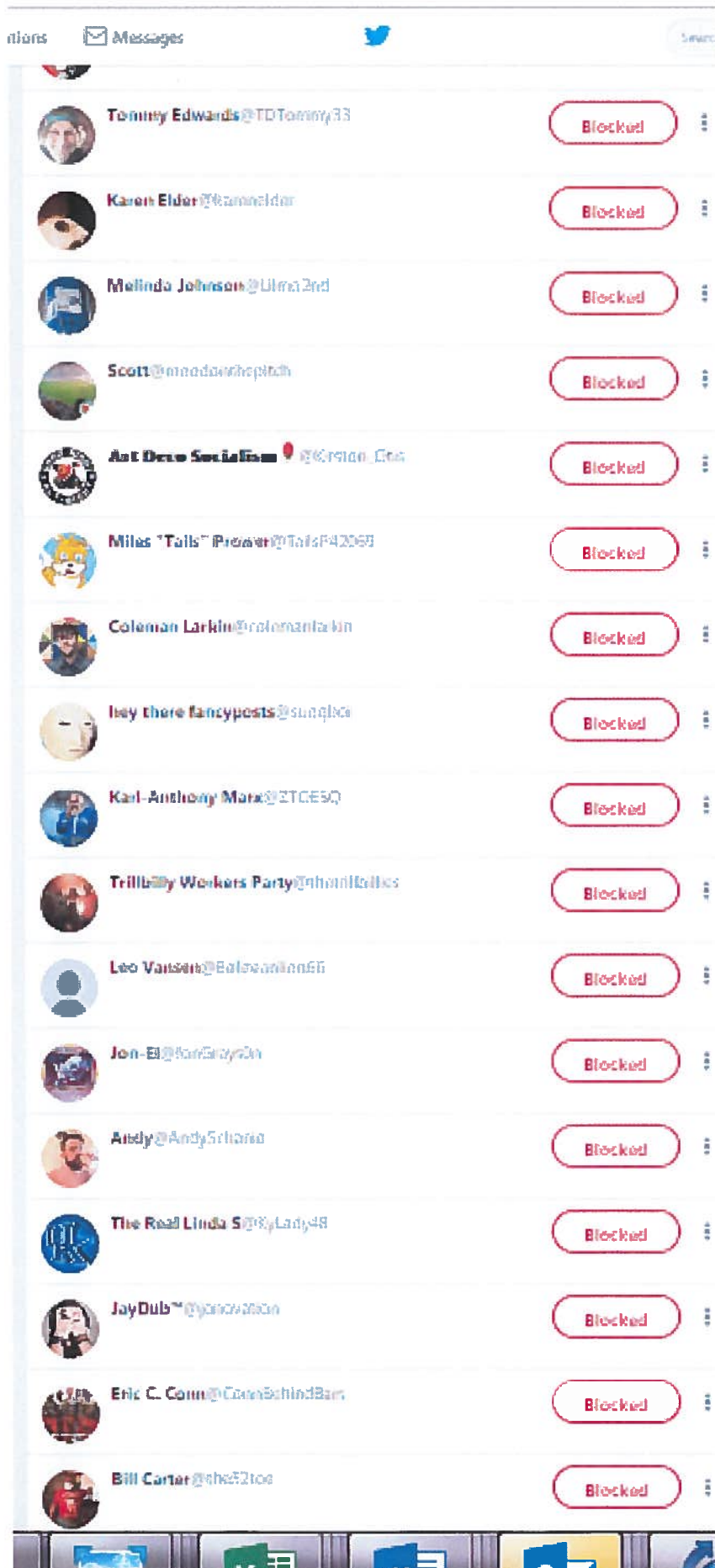
BLOCKED		
ns Messages		
	Jeffery R. Stone: One Voice Loudly@jethay1970	Blocked
	DICK@jhranneck	Blocked
	cat@pikellina	Blocked
	Norma K@normakennedy35	Blocked
	Kirsten French@kfr1975	Blocked
	Michael J. Cuoco@gandal747	Blocked
	Chris@crapulently	Blocked
	Pippa Cordella Vanlandingham@pethaleffects	Blocked
	Temple C. East@TCoolmom43	Blocked
	Dr. Bobbs Respector@fokkosiennan	Blocked
	Jacob Emont 🇺🇸@jpeomom	Blocked
	Jason Karov@jasonkarov	Blocked
	carib@ameobanaanyneon@DrRow_Mustafa3	Blocked
	Sick@thisisnot@jessissicktoyou	Blocked
	Randall 🇺🇸@RandallLarford2	Blocked
	DUMB TRUMP@DUMBTRUMP3	Blocked

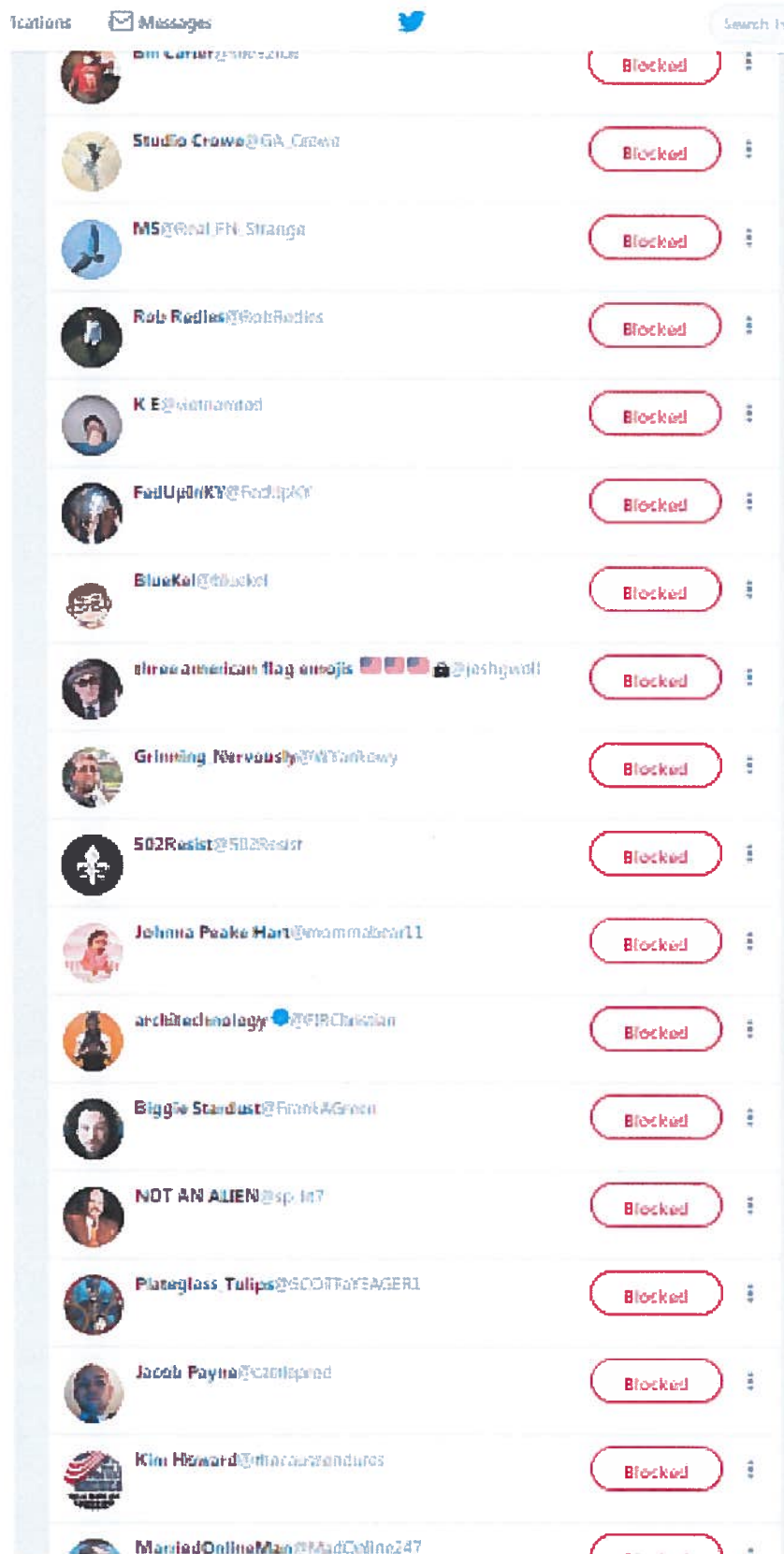
ions

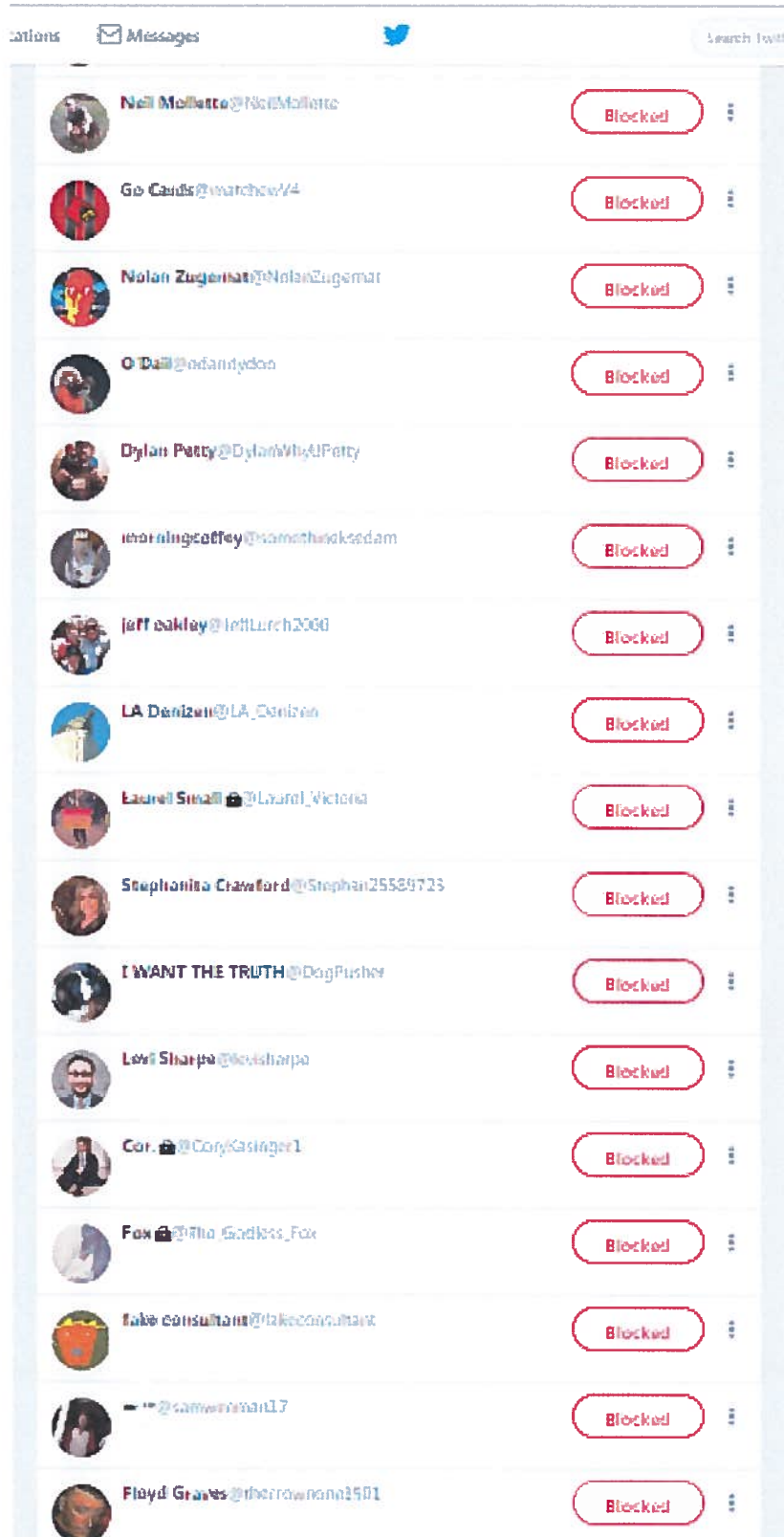
Messages


















Search Twitter

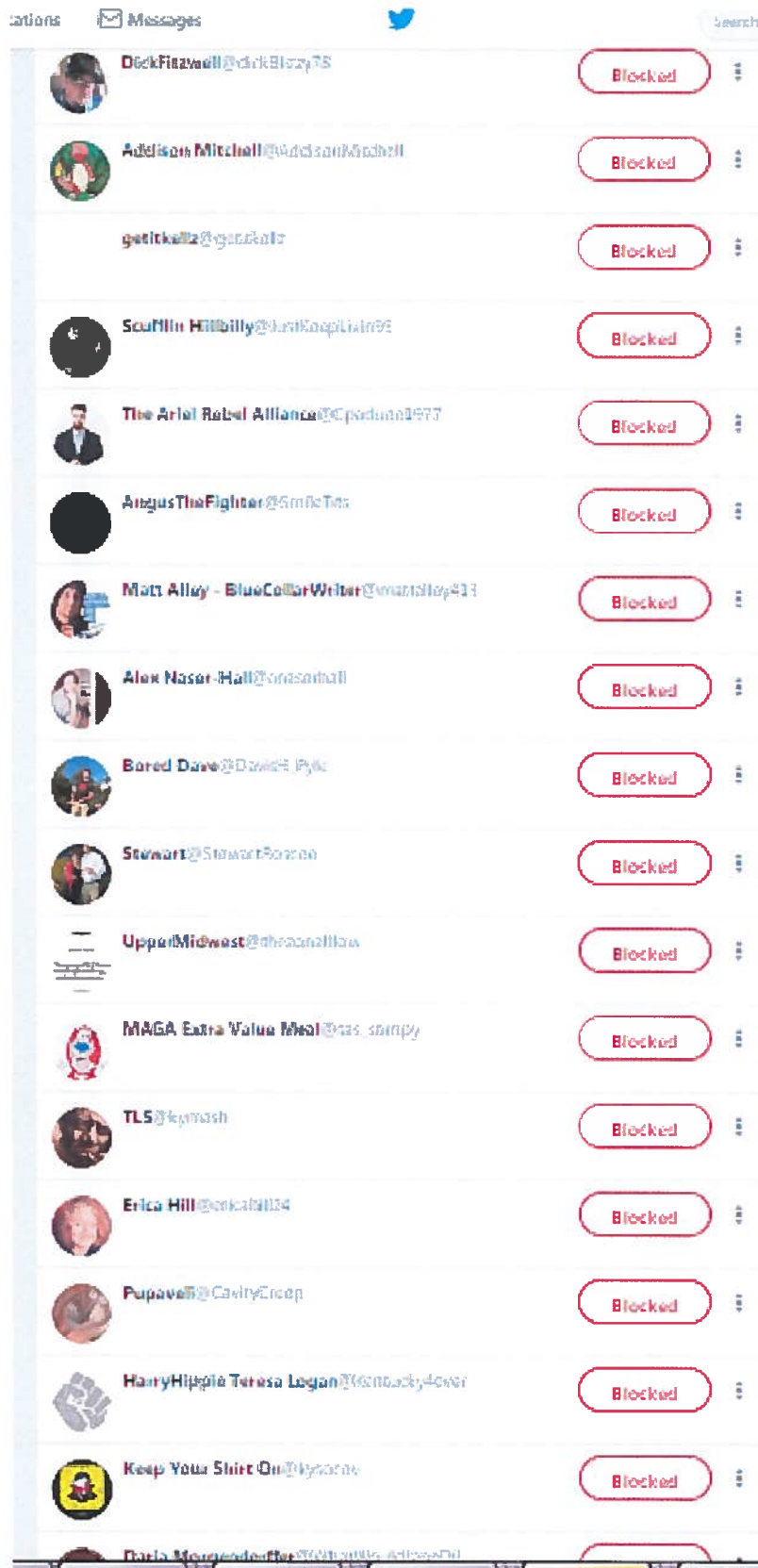
	Catly Kaku  @catlykakul	Blocked	400
	Concerned Citizen @ChadGross	Blocked	100
	The Cause endures @kydutchess	Blocked	400
	Mugshot Productions @Mugshot_Artist	Blocked	100
	LM Enapi @lmesugarbuzz	Blocked	100
	Maria T. Accordi has a hippocampus @manatascar	Blocked	400
	TIM @ElectricIntel	Blocked	400
	Chris Lockhart @ChrisHolmesLock	Blocked	400
	Aaron Howard @realAaronHoward	Blocked	400
	Connie C L @LadyConstance55	Blocked	100
	Fake Ginell MARCH @fakeginell	Blocked	400
	flossin' to washal dunyan @flossingins	Blocked	400
	Bert Hoskinson @houzvalbert	Blocked	400
	Cody Sparks @csparks87	Blocked	400
	Jerry Huckaby @jrhuck	Blocked	400
	Feminist Flag Corps @FemFlagCorps	Blocked	400
	Griswold @KyCanpethaggar	Blocked	400

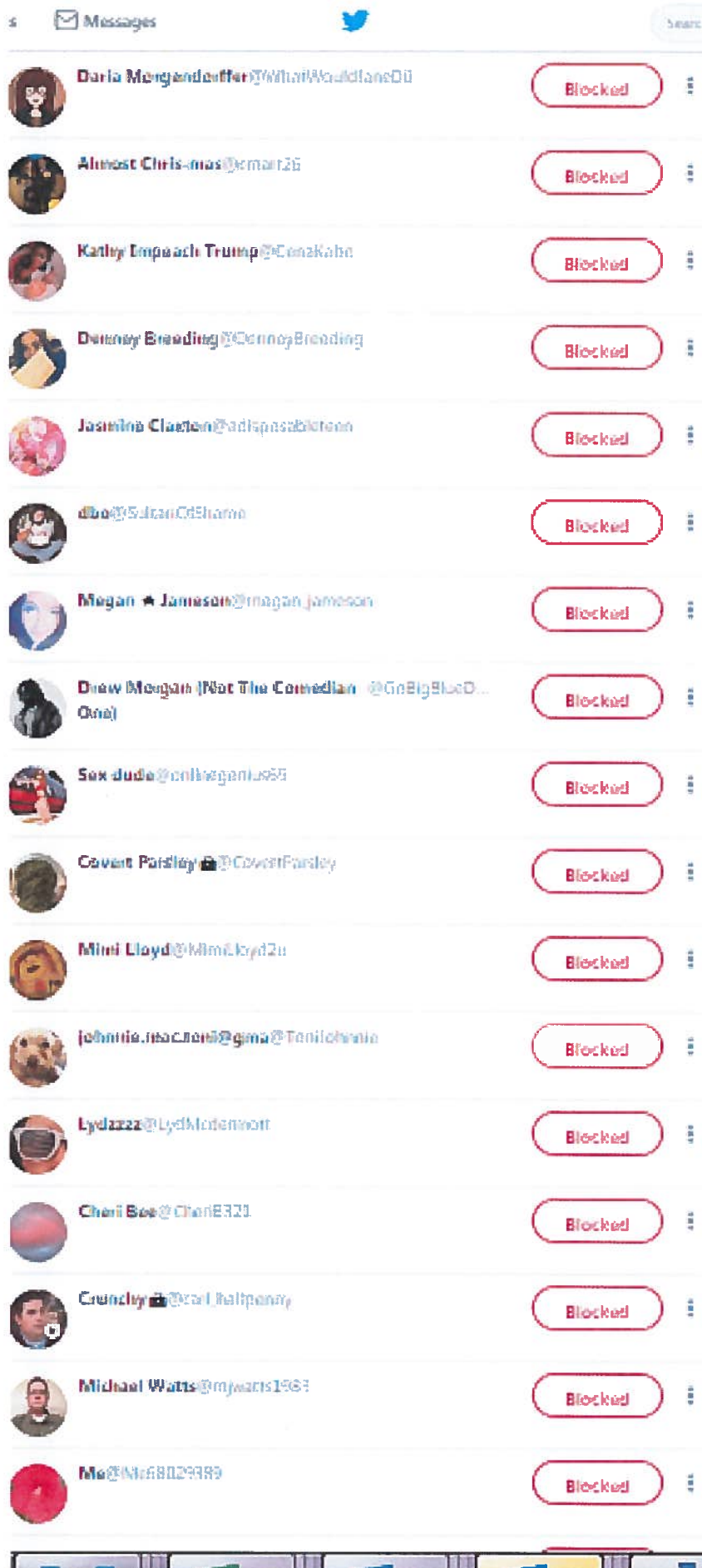


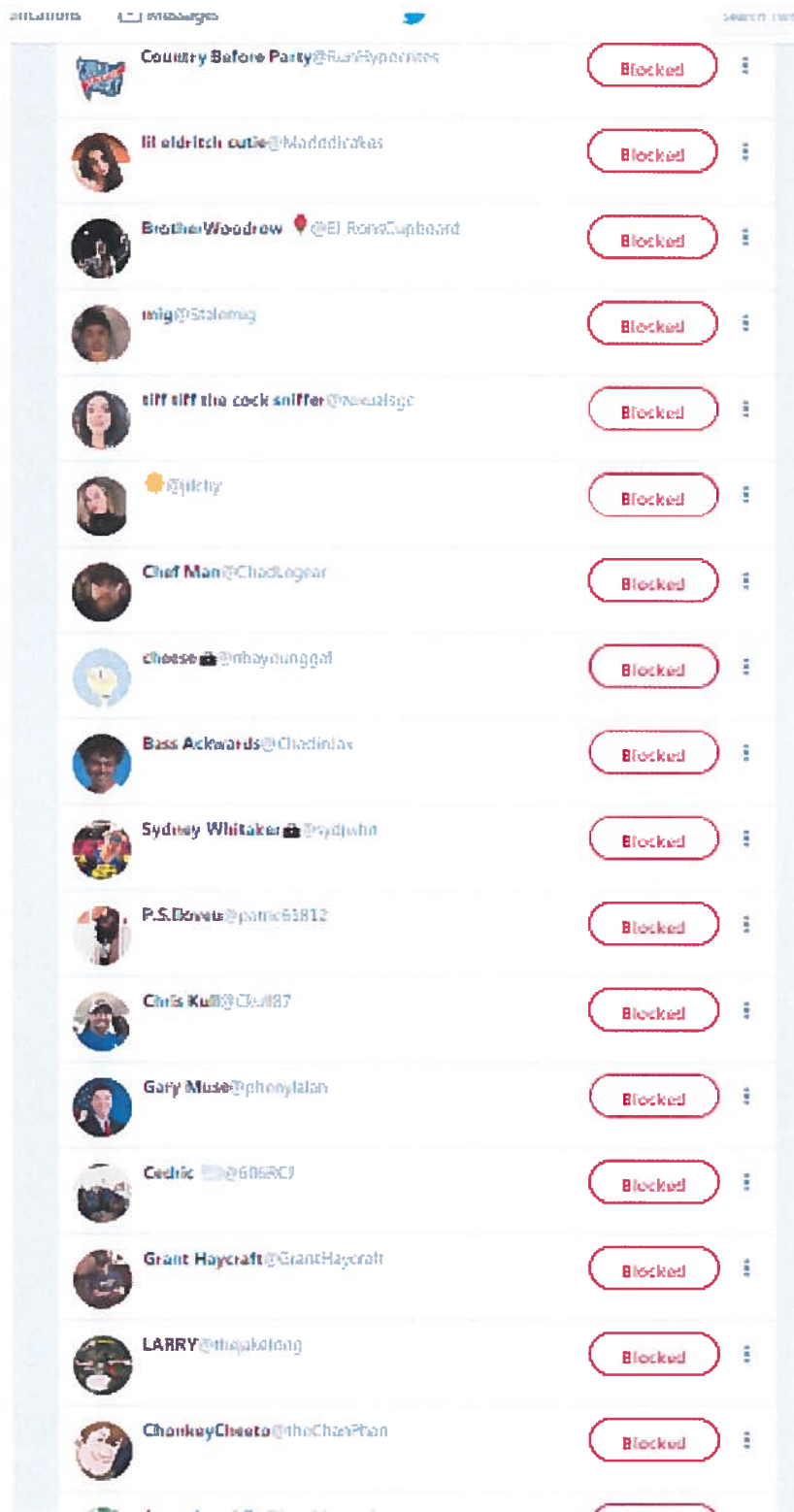





















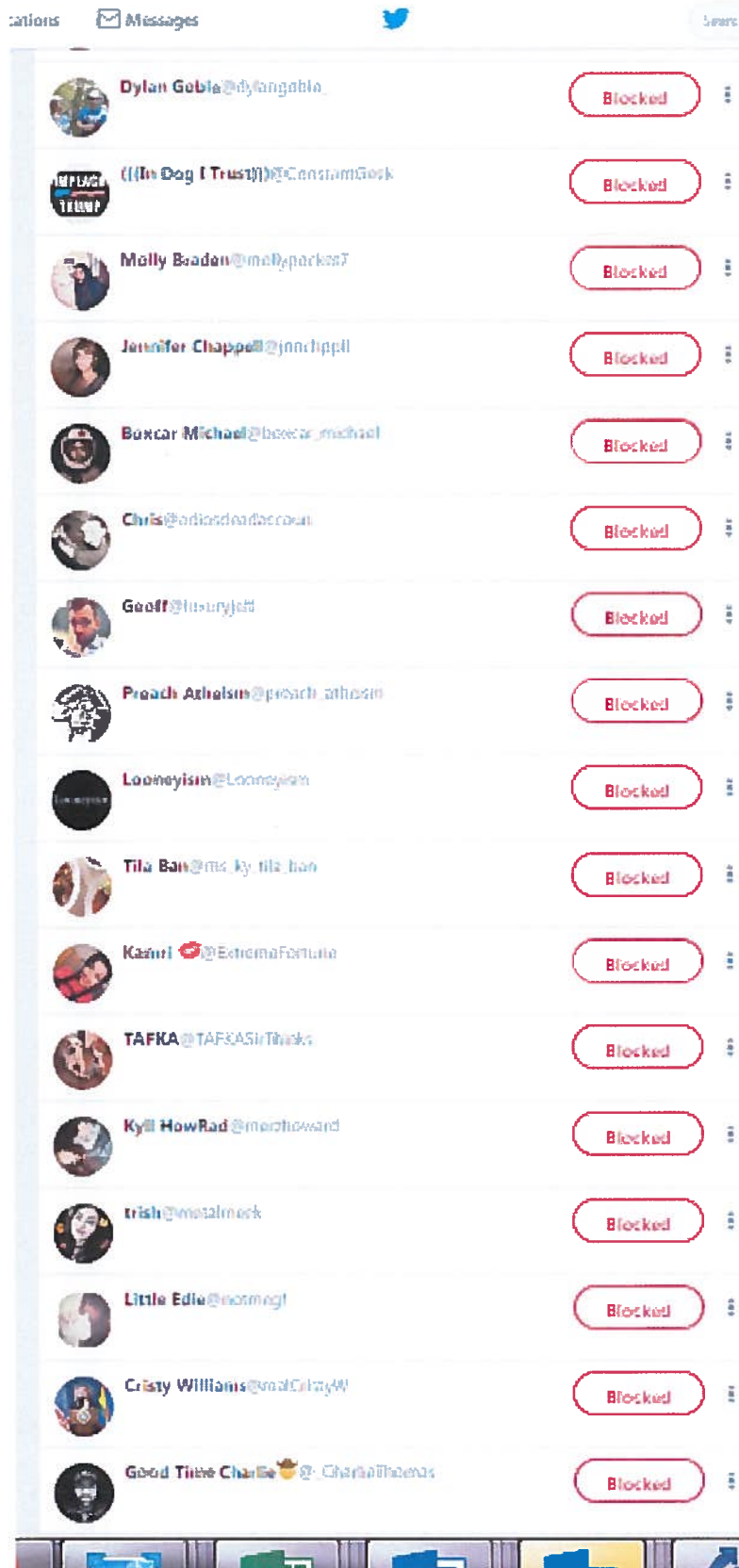
	Tammy Nallo @TammyNallo	Blocked	100%
	TrollmancerAndChad @EPresidentTroll	Blocked	100%
	Mr. Pantagalli @SayNoCreamMtn	Blocked	100%
	silance @OGsilance	Blocked	100%
	Connie Lingus @MrFluoridacy	Blocked	100%
	FWD CROBLU @fwdcroblu	Blocked	100%
	Brenda @BrendaBjDunn93	Blocked	100%
	Trey Lucas @mReacts3	Blocked	100%
	Jan Marie @SurvivingWasch	Blocked	100%
	Nem Rac D @ladydch	Blocked	100%
	Ditch Mitch in 2020 @nothystarface	Blocked	100%
	Cowboy under the Stars @KjHoopFan	Blocked	100%
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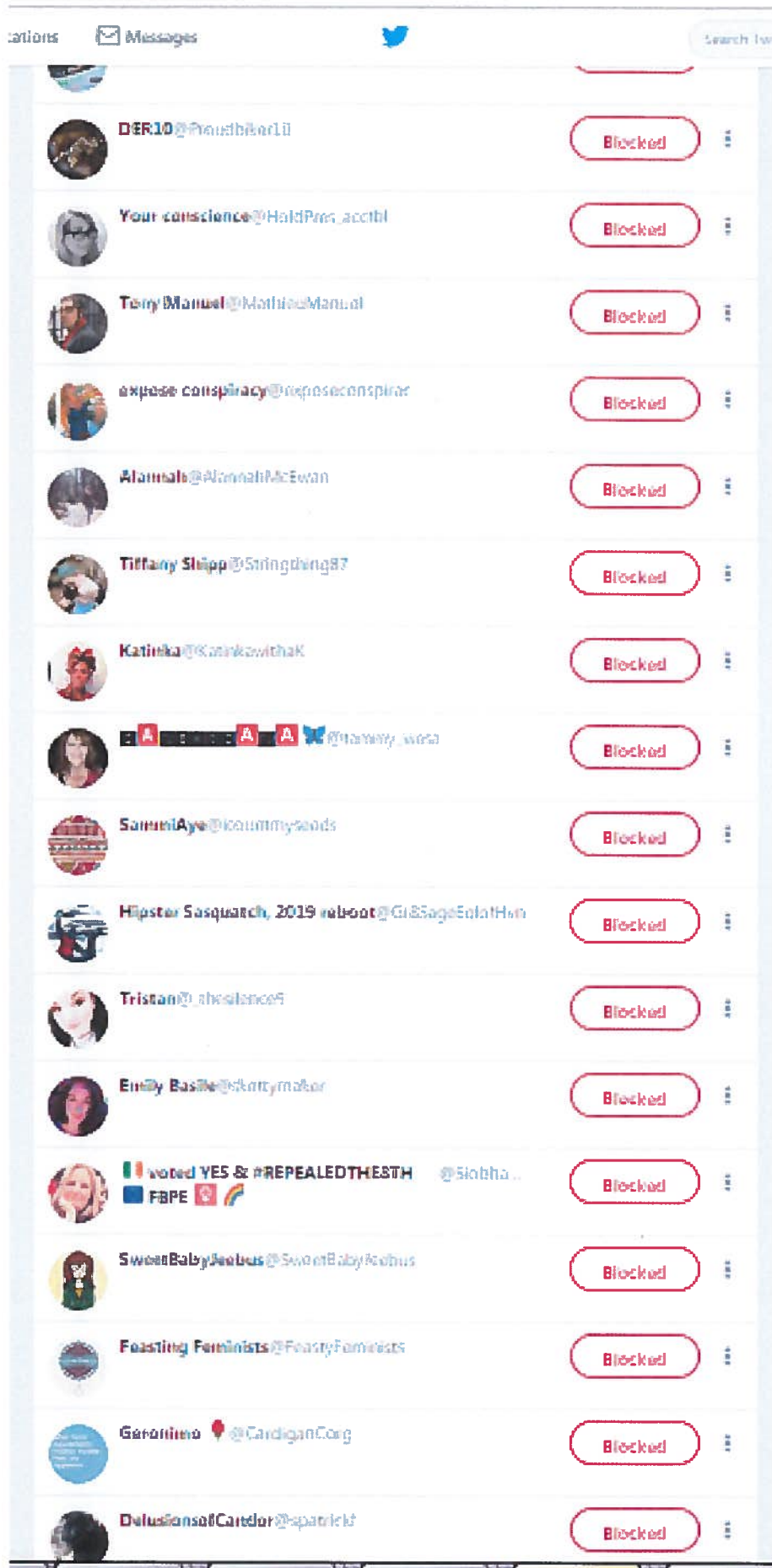




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	pamela kumdungeon @bradyvax	Blocked	100
	Kam @kamadwcl138	Blocked	100
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	iReadNovels @iReadNovels	Blocked	100
	rwh11806 @rwh11806	Blocked	100
	Kink Bitz @kinkbitz	Blocked	100
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	Wpup @Kentucky_Bedlam	Blocked	185
	carol @rad_carol	Blocked	185
	trope wand @dog@s_quine_squire	Blocked	885
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	the goons negotiated @andrewbeams	Blocked	185
	Brad Presnell @bradpresnell	Blocked	185
	(M) Salty Badger @flying_badger	Blocked	885
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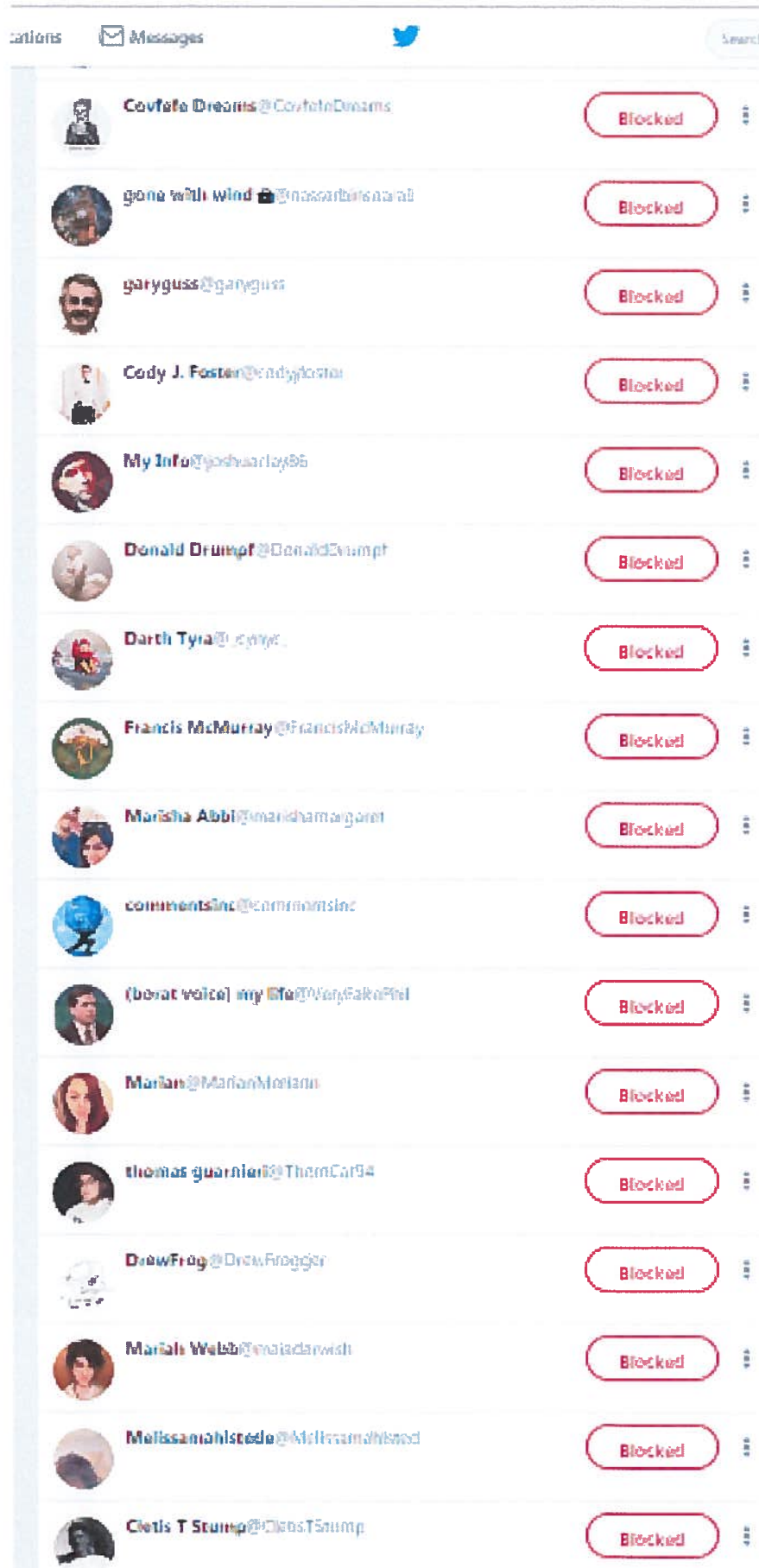
Laura Haggarty@KentuckyEntwife

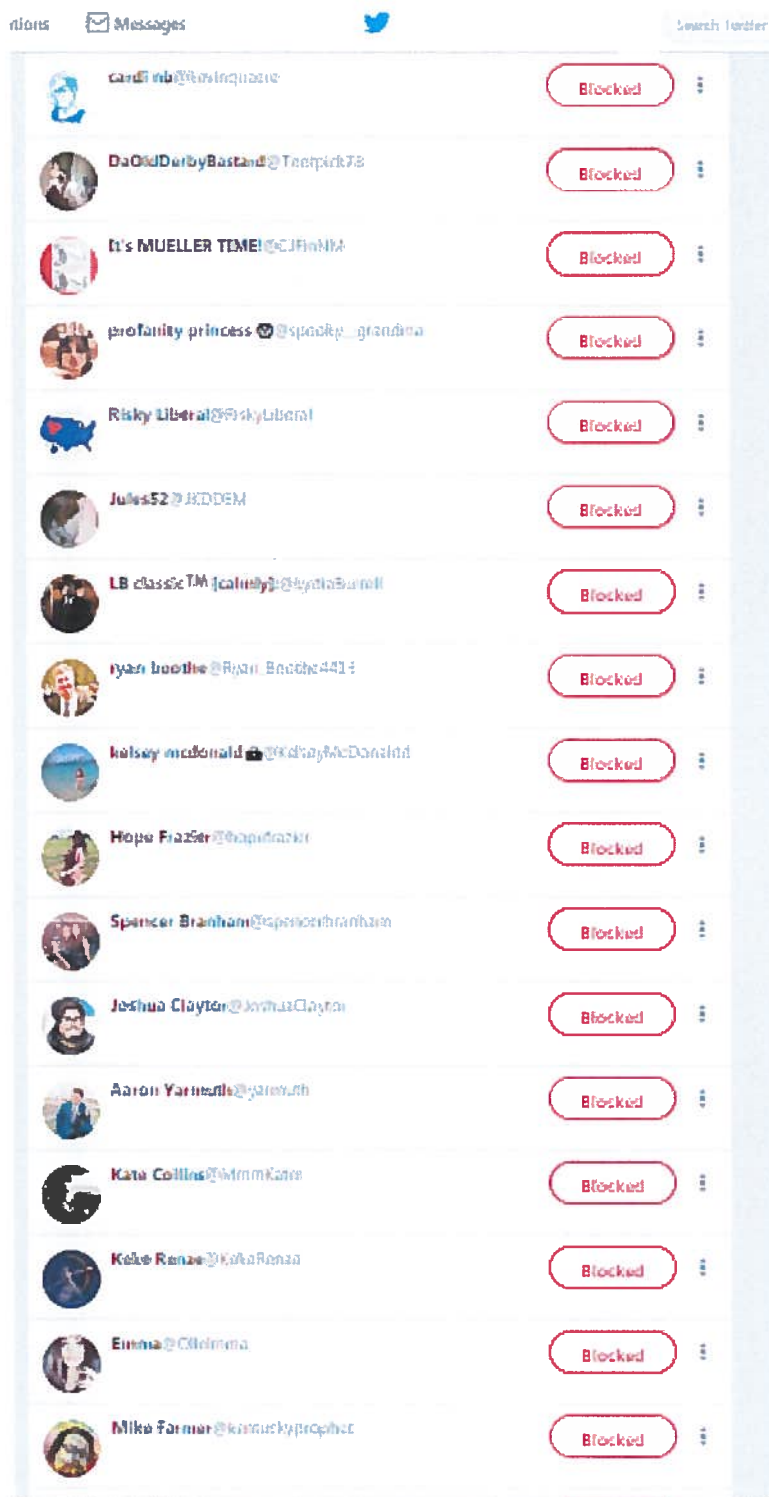
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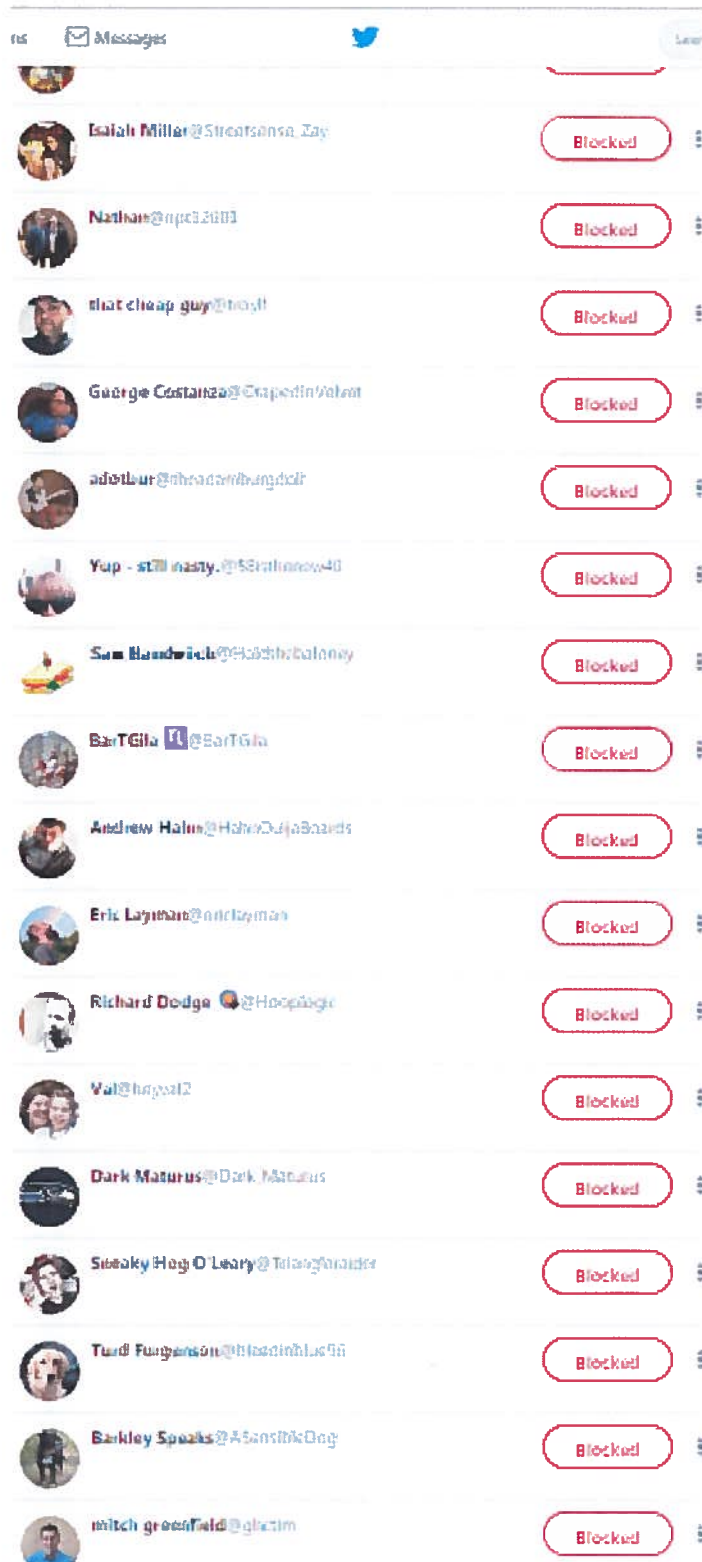
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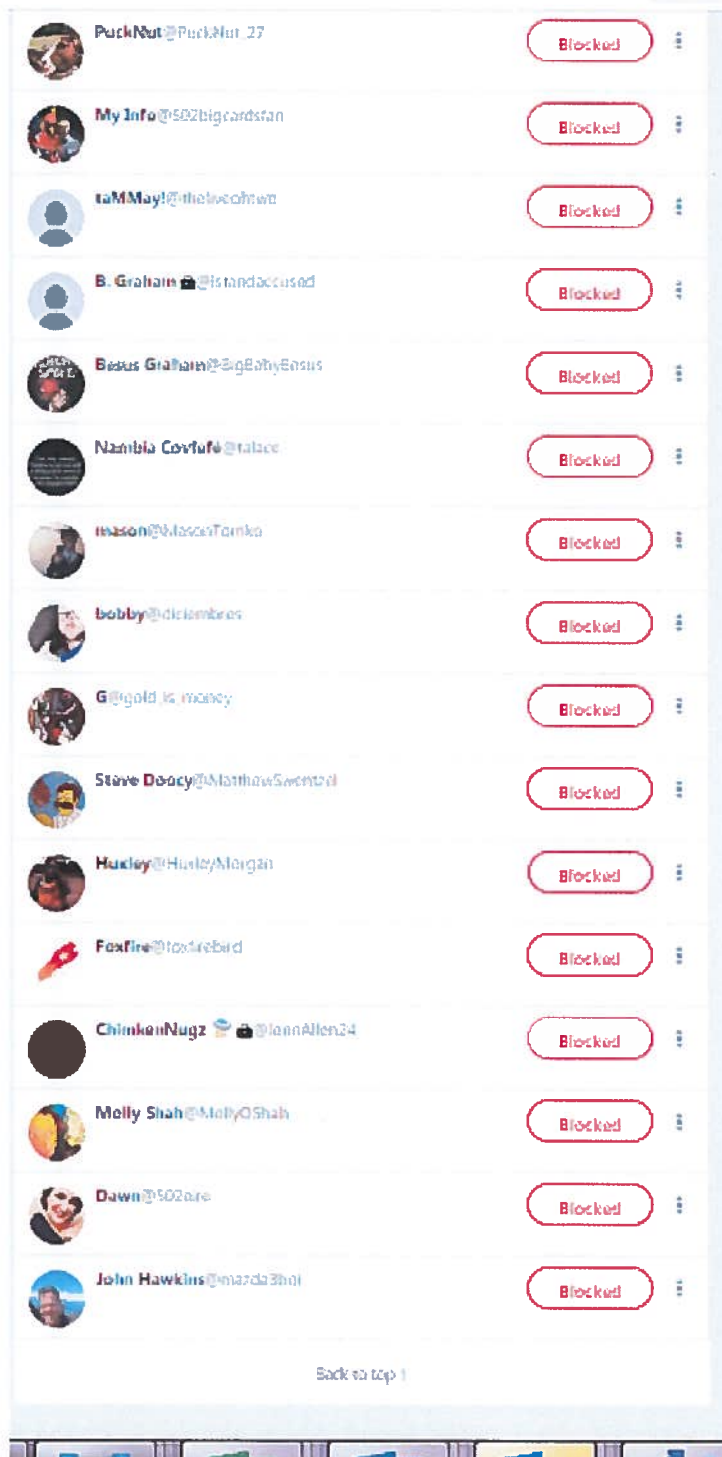
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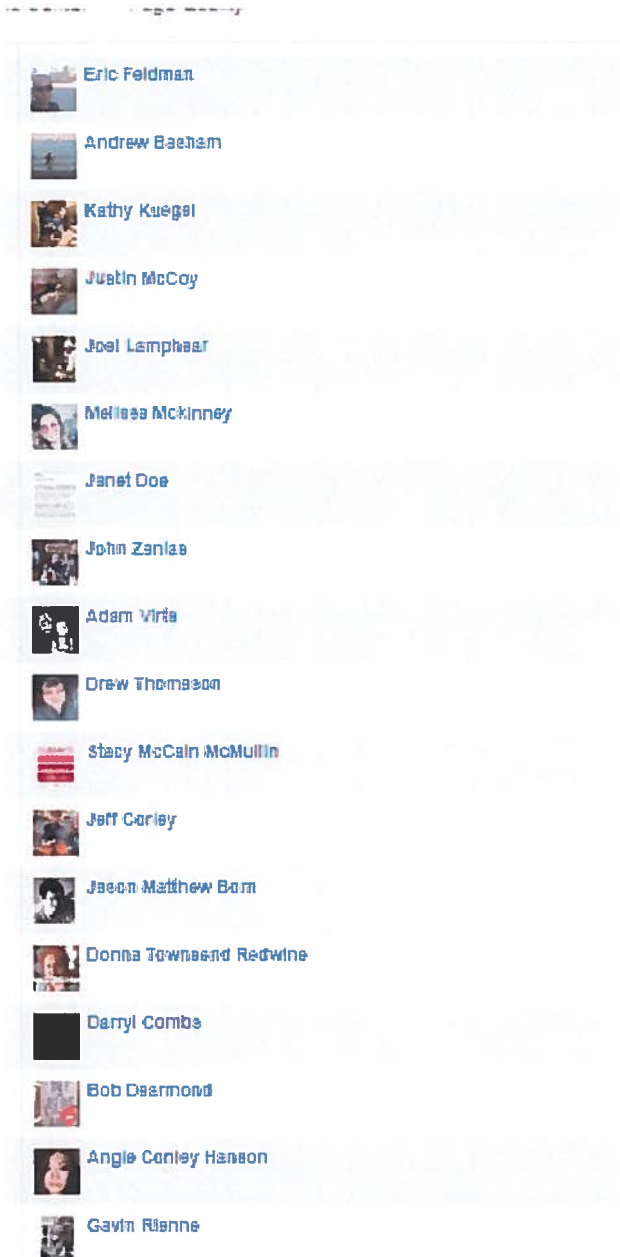
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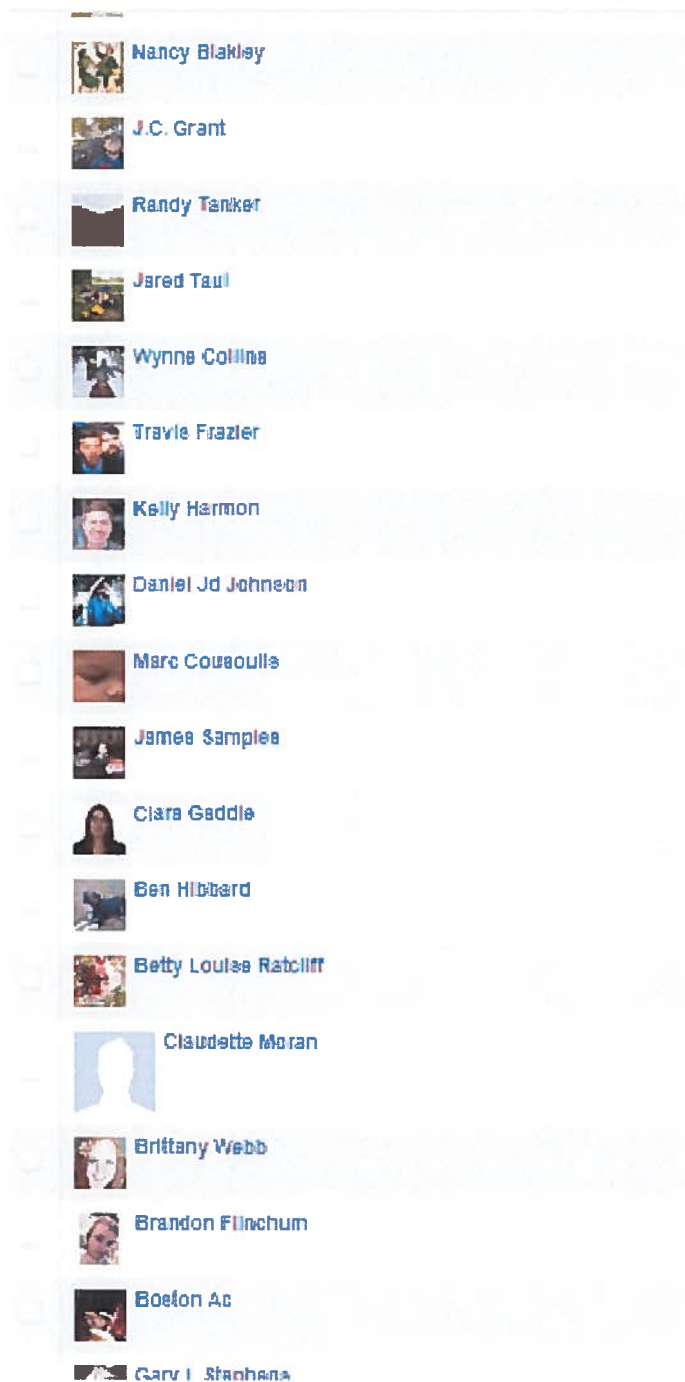
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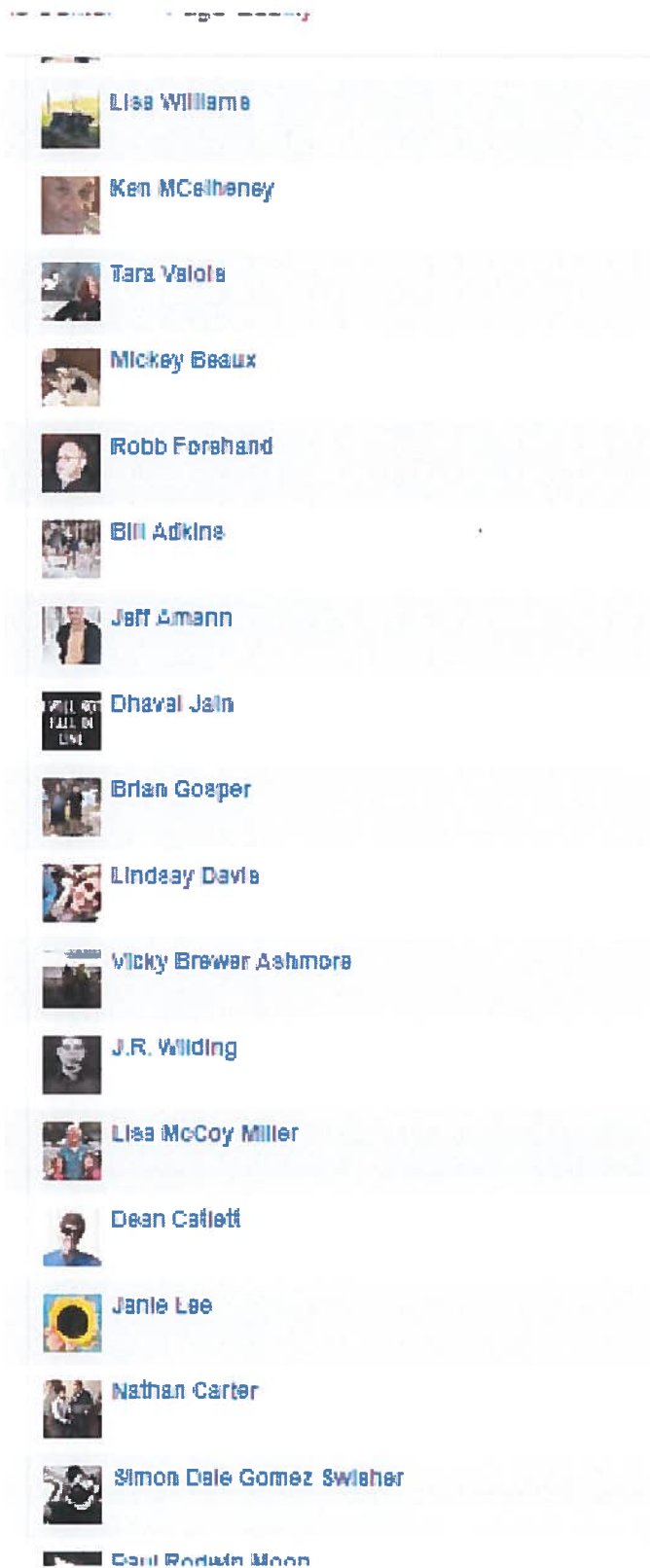
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






Jacqueline Russell





















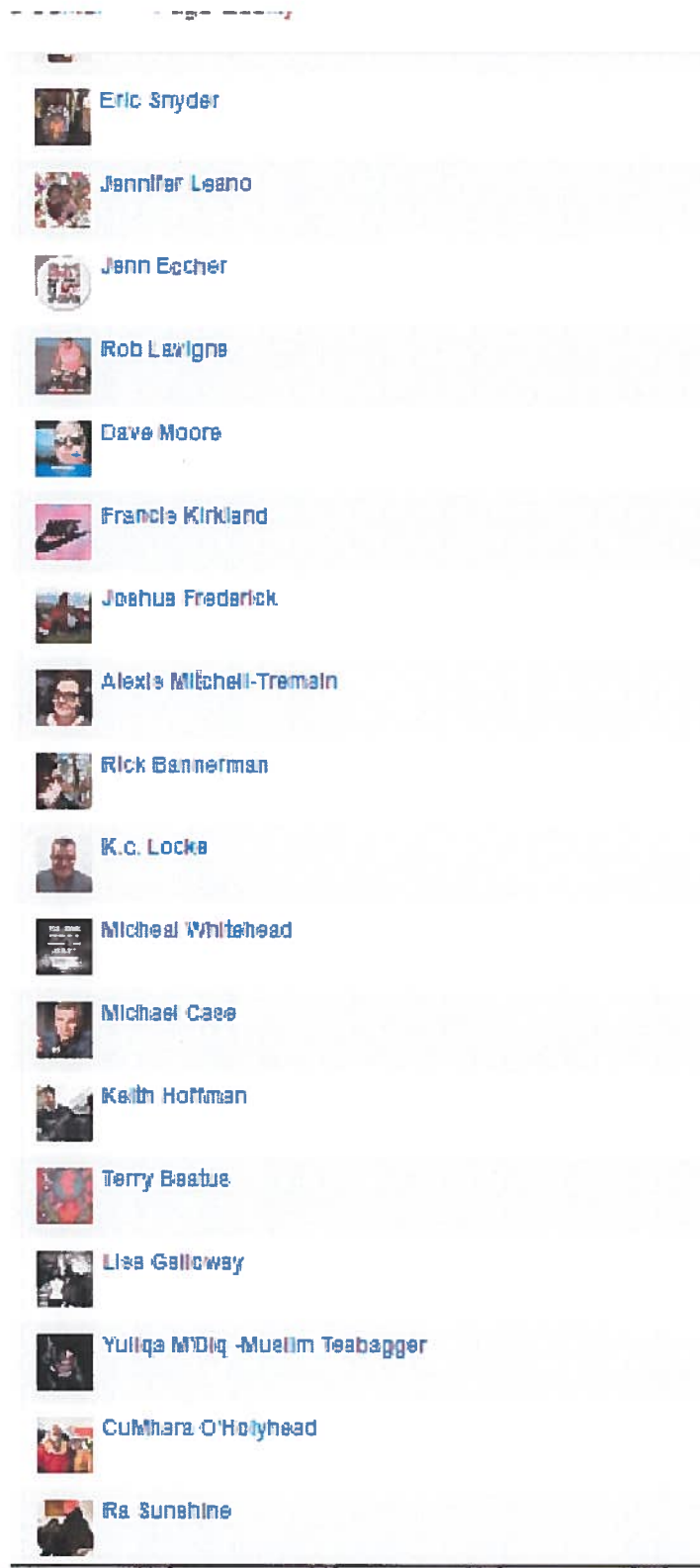
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT

DREW MORGAN AND MARY HARGIS)
)
 Plaintiffs)
)
 vs.) CASE NO. 3:17cv00060
)
 MATT G. BEVIN, in his)
 official capacity as Governor)
 of Kentucky,)
)
 Defendant.)

* * *

The deposition of **NICOLE BURTON**, taken
pursuant to notice by the Plaintiffs on October 17,
2018, in the Kentucky State Capitol Building, 700
Capitol Avenue, Room 107, Frankfort, Franklin County,
Kentucky.

JENNIFER R. JANES, RPR, CRR
McLendon-Kogut Reporting
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(502) 585-5634
jjanes@mcclendon-kogut.com
www.mcclendon-kogut.com

1 pattern of them doing that, then yes, or if it's an
2 extremely abusive comment, yes.

3 Q. And is it your understanding that others in the
4 office follow a similar practice on -- with respect
5 to blocking abusive comments on Twitter?

6 A. That would be my understanding.

7 Q. So I understand -- so we're going to go through
8 the other categories. I want to make sure I have
9 them correct.

10 A. Okay.

11 Q. So we talked about abusive. There's obscene?

12 A. Obscene and vulgar.

13 Q. Obscene and vulgar. You would call it obscene
14 and vulgar as that category.

15 A. Yes.

16 Q. Okay. And then what are the other categories?

17 A. Besides those two?

18 Q. Yeah, we have abusive, obscene and vulgar, and
19 then --

20 A. Off topic and/or spam.

21 Q. Off topic and/or spam, okay. Just want to make
22 sure we're using the right language as you understand
23 it. Okay. Let's talk about obscene and vulgar.

24 A. Okay.

25 Q. My first question is what -- is there a

1 difference between obscene and vulgar?

2 A. Not specifically. We use those
3 interchangeably.

4 Q. So --

5 A. Obscenities would probably refer more to
6 maybe -- yeah, we use those interchangeably, yeah.

7 Q. Okay. So give me your understanding of obscene
8 and vulgar, and if you want to use them
9 interchangeably you can just refer to it as obscene,
10 or you can refer to it as obscene and vulgar, but for
11 our purposes if I say just obscene I'm referring to
12 what you refer to as obscene and vulgar.

13 A. Okay. So an obscenity, a vulgarity would be
14 words that would -- basically any word that's going
15 to be caught by broadcast television censoring, that
16 would be a vulgarity or an obscenity. I'm just going
17 to use both every time.

18 Q. That's okay.

19 A. So typical curse words, if it's going to be
20 blocked on broadcast TV for, then it would fall under
21 that category. Any nudity.

22 Q. Quickly just so it's clear, when you refer to
23 nudity, you're saying not text, but if somebody were
24 to use a photo?

25 A. A photo, correct. Yeah, I think that would be

1 fuzzy kind of a thing, I don't know if you've ever
2 heard that term.

3 An evergreen post, so by evergreen I mean
4 something that's just -- it could go up at any time.
5 It's something that just kind of a Kentucky, we're
6 proud of Kentucky, kind of feel good post, if you
7 will.

8 Q. Okay. So what type of post would you consider
9 to be off topic?

10 A. I would just have to see replies. Like being
11 subjective -- can you clarify your question? Because
12 I don't -- without seeing the replies, like I can't
13 think of something right off the top of my head, like
14 that would be off topic.

15 Q. So -- sure. So let's look at some replies.

16 A. Okay.

17 Q. Let's look at Exhibit 9.

18 A. Okay.

19 Q. Is it fair to say that this is -- this Exhibit
20 9 is a series of screen shots of replies to the tweet
21 that we saw in Exhibit 8?

22 A. Yes.

23 Q. Okay. So -- so are there replies here - I mean
24 look at the replies here. What would you consider to
25 be not on topic?

1 would be -- if you were to be training me on how to
2 monitor the Governor's social media pages, can you
3 give me an example of something I would be looking
4 for that would be off topic?

5 A. So what I would tell you to look for is
6 something that was clearly off topic. Wouldn't be
7 much debate to it whether or not it was on or off
8 topic, so it would be clear, and I would tell you to
9 look for repetitive off-topic comments.

10 Q. And how many off-topic comments should I be
11 looking for?

12 A. Look for a pattern. Whether it be under a
13 specific post or whether it be a pattern of maybe the
14 same -- the same comment or same kind of comment, the
15 same kind of off-topic comment or the same kind of
16 off-topic -- yeah. Showing a pattern over an
17 extended period of time or under a specific post or
18 in that day.

19 Q. Okay. So are we talking two, more than two?

20 A. Yes.

21 Q. More than three?

22 A. I would say I would look -- it would depend.
23 If it was more than three on one post, yes. If it
24 was more than three over a course of a month, no.

25 Q. So more than three on one post as a sort of

1 A. I don't know.

2 Q. Are you aware of anybody who is able to block
3 using their mobile device?

4 A. Can you repeat the question?

5 Q. Yeah, are you aware of anybody in the
6 communications department who can block while
7 using -- when using their mobile device?

8 A. Yeah.

9 Q. But you can't?

10 A. No. What I'm saying is sometimes through the
11 app it doesn't give me the option to block a specific
12 comment. It would just let me hide it. That's not
13 consistent. It's an app thing, honestly.

14 Q. Okay.

15 A. Yeah. Technology.

16 MR. KUHN: Corey, we've been going about an
17 hour and a half.

18 MR. SHAPIRO: Yeah, let's take a break. It's a
19 good time.

20 (Recess from 4:25 p.m. to 4:39 p.m.)

21 Q. What is your understanding of the process for
22 having someone reinstated, having their account
23 reinstated?

24 A. What's my understanding of --

25 Q. Of the process.

1 A. The process? I know we have a written policy.

2 They are asked -- the account holder, to have a
3 specific account unblocked or reinstated, would be
4 asked to abide by specific guidelines, and upon their
5 agreement would be reinstated.

6 Q. And how does someone find out about that
7 process?

8 A. I don't know that someone finds out about it.
9 I think they just ask. They would ask.

10 Q. Okay. So there's nothing on Facebook that says
11 if you're blocked, contact us?

12 A. No.

13 Q. No?

14 A. No.

15 Q. There's no FAQ, frequently asked questions?

16 A. No.

17 Q. And same thing with Twitter?

18 A. Correct.

19 Q. Who has the power, for lack of a better word,
20 to approve reinstating any user?

21 A. I would say that the communications director
22 would have any final approval if that was needed.

23 Q. Have you ever approved someone?

24 A. To be reinstated?

25 Q. Correct.

Meredith, Chad (Gov Office)

From: Maglinger, Woody (Gov Office)
Sent: Tuesday, June 19, 2018 11:54 AM
To: Burton, Nicole (Gov Office)
Cc: Kuhn, Elizabeth G (Gov Office)
Subject: FW: Gov. Bevin's Official Twitter Account



From: Maglinger, Woody (Gov Office)
Sent: Saturday, January 13, 2018 11:30 AM
To: 'Bob Crawford' <bob.crawford@gmail.com>
Subject: RE: Gov. Bevin's Official Twitter Account

Mr. Crawford,

Thank you for your response. I construe your response as an agreement that you will not violate the rules outlined in my previous e-mail.

As a result, we will unblock your account. However, please be aware that your account will be blocked once again if you violate these rules after being unblocked.

What is your Twitter handle? (example: @johnsmith_18)

Thanks again,
Woody

From: Bob Crawford [<mailto:bob.crawford@gmail.com>]
Sent: Friday, January 12, 2018 12:27 PM
To: Maglinger, Woody (Gov Office) <Woody.Maglinger@ky.gov>
Subject: Re: Gov. Bevin's Official Twitter Account

Mr Maglinger

Excuse me, but I have always followed the rules of basic courtesy. You seem to indicate I did one or more of these things to get blocked to begin with and I did not. I'm offended by the implication. My crime may be disagreeing with the Governor, but I am not behaving the way you have outlined here.

To continue to be public servants to the Commonwealth, I would strongly advise toughening your delicate skins and quit accusing residents of Kentucky of doing things they have not done. Blocking me from viewing an elected official's Twitter feed is not only petty, it's hostile.

Bob Crawford

Sent from my iPad

On Jan 10, 2018, at 7:27 PM, Maglinger, Woody (Gov Office) <Woody.Maglinger@ky.gov> wrote:

Mr. Crawford:

We have received your request to be unblocked from Gov. Matt Bevin's official Twitter account.

By engaging with Gov. Bevin through social media, you must agree not to post:

- Obscene, indecent, or profane comments, pictures, and/or videos;
- Abusive comments (such as threats of violence, defamatory statements, fraudulent statements intended to mislead others, or derogatory comments regarding race, color, gender, sexual orientation, national origin, ethnicity, age, religion, or disability);
- Comments that are clearly not related to the topic of the post on which the comment is made;
- Comments made for the purpose of promoting or endorsing commercial services or products; and
- Comments that violate any local, state, or federal laws and/or are otherwise unlawful.

Will you agree to follow these rules in interacting with Governor Bevin through social media? If so, we will be happy to unblock your account, with the understanding that future violations of these rules will result in having your account blocked once again.

Thank you,

Woody Maglinger

Press Secretary

Office of Governor Matt Bevin

Phone: 502-564-2611

Woody.Maglinger@ky.gov

Keep up with Governor Bevin:

<image001.png> <image002.png> <image003.png> <image004.png>

From: Park, Jon (Gov Office)

Sent: Tuesday, January 09, 2018 2:59 PM

To: Stamper, Amanda (Gov Office) <Amanda.Stamper@ky.gov>

Subject:

Bob Crawford (55978)

926 Charles Street

Louisville, KY 40204-2469

Phone: (502) 550-9133

Email: bob.crawford@gmail.com

Jon E. Park

Executive Director, Constituent Services

Office of Governor Matthew G. Bevin

700 Capitol Avenue Rm 133

Frankfort, KY 40601

Office: (502) 564-2611 Ex. 324

Jon.Park@ky.gov

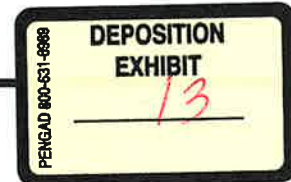
*Working together to become the best version of ourselves.
United We Stand, Divided We Fall #WeAreKentucky*

Keep up with Governor Bevin:

<image001.png><image002.png><image003.png><image004.png>

Confidentiality Notice: This e-mail message, including any attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

Meredith, Chad (Gov Office)



From: Stamper, Amanda (Gov Office)
Sent: Monday, June 5, 2017 1:39 PM
To: Maglinger, Woody (Gov Office)
Subject: RE: (Draft) RESPONSE: Media Inquiry

"Gov. Bevin is a strong advocate of constructive dialogue, and he welcomes thoughtful input from all viewpoints on his social media platforms. Unfortunately, a small number of users misuse those outlets by posting obscene and abusive language or images, or repeated off-topic comments and spam. Constituents of all ages should be able to engage in civil discourse with Governor Bevin via his social media platform without being subjected to extreme vulgarity or abusive trolls."

From: Maglinger, Woody (Gov Office)
Sent: Monday, June 05, 2017 12:44 PM
To: Stamper, Amanda (Gov Office) <Amanda.Stamper@ky.gov>
Subject: (Draft) RESPONSE: Media Inquiry

Any better? ... Additional suggestions?

Hey, Charlie –

Gov. Bevin is a strong advocate of constructive dialogue, and he welcomes input from all viewpoints on his social media platforms (Facebook and Twitter).

Unfortunately, we do occasionally have to block a small number of users who misuse those outlets. During a typical week, we block just a handful of users—less than 10. (The vast majority of these are on our Twitter account, as opposed to Facebook. Also, a portion of these users are not Kentucky constituents, but individuals from outside the Commonwealth.)

We block users for three main reasons: 1) vulgarity or obscenity (text or images), 2) verbal abusiveness and/or bullying toward other users, and 3) spamming/advertising. There is not a policy/process on unblocking per se, but we would consider any such request on a case-by-case basis.

Thank you,
Woody

From: Charles Ornstein [<mailto:Charles.Ornstein@propublica.org>]
Sent: Monday, June 05, 2017 9:48 AM
To: Maglinger, Woody (Gov Office) <Woody.Maglinger@ky.gov>
Subject: RE: Media Inquiry

Hi Woody, As you probably know, the Kentucky Democratic Party has been critical of the governor regarding social media blocking. In particular, they say the governor and/or his staff have blocked constituents from following him on Twitter. I was hoping you could tell me 1) How often this has happened, 2) Why it has happened, 3) How you all decide when to block someone, 4) if there is a process for getting yourself unblocked, 5) if there are Constitutional concerns?

The ACLU has said similar blocking in other states is unconstitutional and that people are allowed to hold up objectionable signs at public meetings and this should be no different. Curious for your response to that.

Thanks,
Charlie

Charles Ornstein
Senior Reporter, ProPublica
155 Avenue of the Americas
13th Floor
New York, NY 10013

E-mail: charles.ornstein@propublica.org
Office: (917) 512-0222
Fax: (212) 785-2634
Cell: (818) 679-9363
Twitter: @charlesornstein
My articles: http://www.propublica.org/site/author/charles_ornstein

From: Maglinger, Woody (Gov Office) [<mailto:Woody.Maglinger@ky.gov>]
Sent: Monday, June 05, 2017 9:44 AM
To: Charles Ornstein
Subject: RE: Media Inquiry

Good morning, Mr. Ornstein –

Very sorry I missed your call on Friday.

Is there any specific information we can provide to you?

Thank you,
Woody Maglinger
Press Secretary
Office of Governor Matt Bevin
Phone: 502-564-2611
Woody.Maglinger@ky.gov

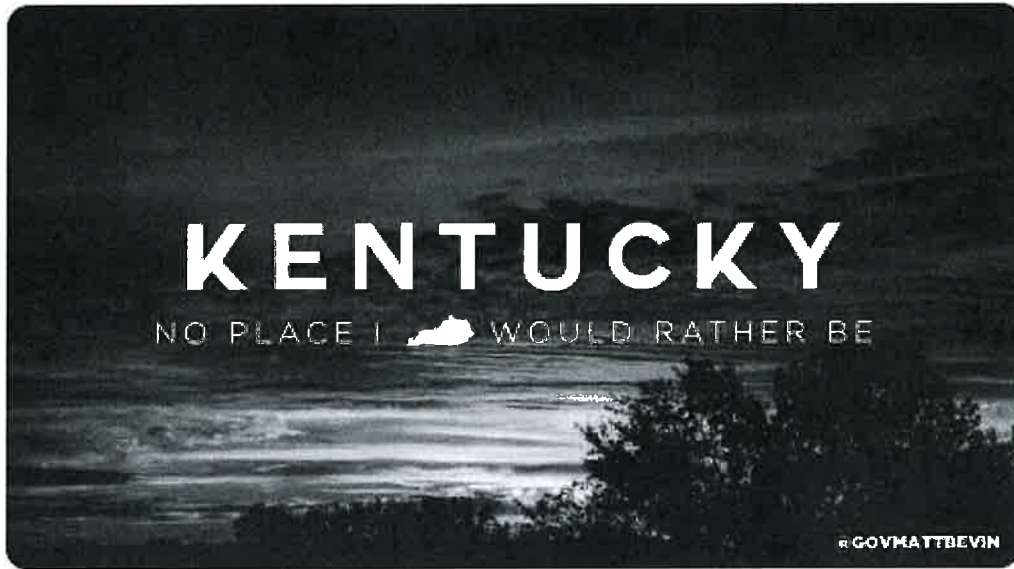
Keep up with Governor Bevin:





Governor Matt Bevin @GovMattBevin · Sep 30

As the sun sets on another weekend, we are thankful for our beautiful Kentucky home. #WeAreKY



13 35 166





Governor Matt Bevin ✓

@GovMattBevin

Follow



Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

8:36 PM - 13 Dec 2017

536 Retweets 1,698 Likes



313 536 1.7K



Tweet your reply



Eliza @elizahollywood · 13 Dec 2017



Replying to @GovMattBevin

my god shed his grace on his victims who will never see justice

3



74



available at <https://twitter.com/GovMattBevin/status/941119597125754881> (last accessed April 29, 2019)

AT&T

10:04 AM

46%



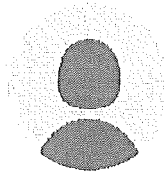
Tweet



352

600

1,855



Bill H

@grovergeeb

Replying to @GovMattBevin

He killed himself because he was
busted for molesting a teen
member of his church/unlicensed
drinking establishment.

12/15/17, 9:33 PM



Tweet your reply



GOV000311



Uncle Tyler @good2bsimple · Dec 11

Rep. Dan Johnson posted racist images of the Obama family in 2016 and now the @KentuckyCIR just broke a story detailing how he sexually assaulted minors, in his church, after he got them drunk. Is this the standard for Kentucky Republicans @GovMattBevin @KYGOP @KYHouseGOP ???

Ryland Barton ● @RylandKY

Rep. Dan Johnson Accused Of Molestation. Both State Political Parties Call For Resignation wfpl.org/state-rep-dan-... via @WFPLNews

1 4 4



Seriously
@SeriousUnci

Follow

Replying to @good2bsimple @GovMattBevin and 3 others

Gawd damn Godless GOPs. Is this standard???

8:50 PM - 11 Dec 2017

1 Like



1



Miss Interested @miss_intere... 11m

Replying to @GovMattBevin

What about Johnson's victim? How much consideration do you have in that direction? PS- Blocking constituents and citizens is a dirty Trump trick- are you no better than that?



Moozhan Toofan @MoozhanT 12m

Replying to @GovMattBevin

oh good... you said this, and now it's your own constituents suffering. but you don't give a damn do you?



Jeff Quin @jeff_quin

2h

Replying to @GovMattBevin

Your support of these abusers show your true colors. It is always support of party regardless of the lack of values. The Moore debacle being the latest atrocity for the GOP. Don't profess your support for his family without a show of support for his victims.

🗨️ ↗️ ❤️ ...

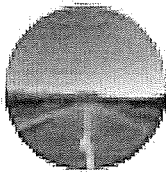
REDACTED



Cristian Istrate @eugen_istrate 10m

Replying to @GovMattBevin

Despicable is what he did! He should have thought about the damage he's causing...



Joner @Fakemot 16m

Replying to @GovMattBevin

so this guy lied about his education, his work history, his family, and the assault, all while holding a bible. Enjoy your trip to Hell Johnson



Robert Hanka @HankaRobert 22h

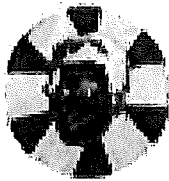
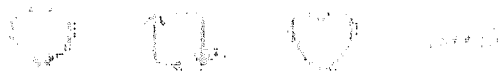
Replying to @GovMattBevin @WHAS11

You cannot demand

(COMMAND) respect it is earned he

was void as a compassionate

human#PurgeGop @WHAS11



jalrobot #RMGCREW @JalroBot 4m

@GovMattBevin It is sad for the

family ...also sad to see a coward

take the easy way out.



REDACTED

Allison Saxton @allsaxton

2h

Replying to @GovMattBevin

Agreed. And you need to make a statement concerning his victim as well. She should be in our prayers, even more so.

🙏 🙏 🙏



Kevin @Korastus · 1h

Replying to @GovMattBevin

He was a racist child molester who exploited multiple tragedies to push lies making himself out to be a hero, you pathetic heap of trash. He deserves no respect or consideration. His victims do.



1





The Currency of Cool @currencyofcool · 1h

Replying to @GovMattBevin

He was a con-artist. Innocent people don't just run off and kill themselves if someone makes a false claim about them.



3





Tweet



Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

584

1,697



REDACTED



Elaine Matthew
@undhockeyfan

Replying to @tolovana66 @GovMattBevin and @JonSawyer91

However not a single reference to the woman molested by Johnson.....

12/14/17, 12:59 AM

9 Likes

Tweet your reply



GOV001591



Tweet



KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

584

1,697



Brandy Hearn DeFalco

@defalcob

Replying to @GovMattBevin

He was a sexual predator and once again left the victim to suffer his actions. He is a COWARD, A LIAR A ARSONIST AND A TRAVELING SIDE SHOW OF A CHURCH...his words of racist bigotry directed at the Obama's should see judgement coming his way. My heart is saddened for the young girl

12/14/17, 1:00 AM

Tweet your reply



GOV001592

AT&T

1:54 PM

65%



Tweet



Governor Matt Bevin @GovMa... · 17h ✓

Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

584

1,697



Joshua Hay
@CMRiverCo

Replying to @GovMattBevin

Maranda received justice tonight.

12/14/17, 12:15 AM

9 Likes



Joshua Hay @CMRiverCo · 13h ✓

Replying to @CMRiverCo and @GovMattBevin

Tweet your reply



GOV001606

AT&T

1:53 PM

66%



Tweet



Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

584

1,697



lanorte1
@lanorte1

Replying to @GovMattBevin

I am deeply saddened to hear of the sexual assault perpetrated on this young woman, who was denied justice. My heart breaks for her...may God shed her grace on this young woman...SHE sure needs - and needed - it.

12/14/17, 9:09 AM

5 Likes

Tweet your reply



AT&T

1:50 PM

66%



Tweet



vulgar comments & other despicable responses to the news of KY Representative Dan Johnson's death, be kept in the minds and hearts of those who have them...Don't share..Please have respect for his family and friends at this time...Thank you

51

72

348



Kinetic Meow
@KineticMeow

Replying to @GovMattBevin

Would ask sincerely to also extend that respect for the victims. Stop defending this child molester. If he didn't sexually abuse minors there would be no nasty comments towards Dan Johnson.

#ThursdayThoughts

12/14/17, 1:09 PM

1 Retweet 1 Like

Tweet your reply



GOV001608

AT&T LTE

5:23 PM

46%



Tweet



Governor Matt Bevin ✓ @GovMat... · 6h ✓

Would ask sincerely that all the nasty, vulgar comments & other despicable responses to the news of KY Representative Dan Johnson's death, be kept in the minds and hearts of those who have them...Don't share..Please have respect for his family and friends at this time...Thank you

72

81

464



TweezlingsMemphis ✓

@Bewyds

Replying to @GovMattBevin

GOP: We Love Jesus.

Also GOP: F's over the poor, F's over the sick, makes excuses for other rapists & pedophiles who are also GOP.

12/14/17, 3:55 PM

1 Retweet

Tweet your reply



GOV001628

AT&T

1:58 PM

64%



Tweet



Governor Matt Bevin @GovMa... · 17h

Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

585

1,698



lil homie gay ass
@fanny_blood

Replying to @GovMattBevin

My heart breaks for the young woman he molested when she was a teenager

12/14/17, 8:43 AM

1 Like



Tweet your reply



GOV001634

AT&T

1:59 PM

63%



Tweet



Governor Matt Bevin @GovMa... · 17h

Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

585

1,698



Mike Crogan
@mikecrogan

Replying to @GovMattBevin

He was a molester....good riddance

12/14/17, 12:25 AM



Tweet your reply



GOV001635

AT&T

2:00 PM

63%



Tweet



Governor Matt Bevin @GovMa... · 17h

Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

585

1,699



brittany
@soloharry2017

Replying to @GovMattBevin

He's a child molester. No sympathy at all for him.

12/14/17, 1:07 AM



Tweet your reply



GOV001636

AT&T

2:02 PM

63%



Tweet



Governor Matt Bevin @GovMa... · 17h

Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

586

1,700



UbiquitousTees
@UbiquitousTees

Replying to @GovMattBevin

Don't forget the pedophile stuff. May God bless the state of Kentucky for having such a moron run it it...they sure do need it

12/14/17, 8:10 AM



Tweet your reply



GOV001637

AT&T

2:06 PM

62%



Tweet



Governor Matt Bevin @GovMa... · 17h

Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

586

1,701



Todd Bolus
@ToddBolusPLLC

Replying to @GovMattBevin

What about the girl he molested, the contractors he ripped off? Where are they in your litany of thoughts and prayers?

12/13/17, 8:46 PM from La Grange, KY

3 Retweets 57 Likes



Tweet your reply



GOV001638

AT&T

2:08 PM

61%



Tweet



indeed shed his grace on us all...we sure need it...

318

586

1,702



REDACTED



Dave Eaks
@DavidEaks



Replying to @Page_Austin and @GovMattBevin

Child molesters don't deserve forgiveness.

12/13/17, 11:32 PM

1 Like



Tweet your reply



GOV001639

AT&T

2:07 PM

61%



Tweet



Governor Matt Bevin @GovMa... · 17h

Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

586

1,702



Carla Chipana
@carlachip

Replying to @GovMattBevin

may god shed his light on the victim and forgive this child molestor. How about let's not elect / hire more molestors?

12/13/17, 10:31 PM

21 Likes



Tweet your reply



AT&T

2:03 PM

62%



Tweet



Governor Matt Bevin @GovMa... · 17h

Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

586

1,701



Stephanie Wireman

@Steph4Oceans

Replying to @GovMattBevin

He was a racist child molester. My stomach turns at the thought of you supporting and mourning this monster. Speaks volumes of your values and character. Party before anything else. Sickening

12/14/17, 7:52 AM

Tweet your reply



AT&T

1:58 PM

64%



Tweet



Governor Matt Bevin @GovMa... · 17h ✓

Saddened to hear of tonight's death of KY Representative Dan Johnson...My heart breaks for his family tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...We sure need it...

318

585

1,698



Ms. Swallow
@mareswallow

Replying to @GovMattBevin

Um, how about some grace for the molested girl?

12/14/17, 11:40 AM



Tweet your reply



AT&T

8:28 PM

25%



Tweet



Representative Dan Johnson's death, be kept in the minds and hearts of those who have them...Don't share..Please have respect for his family and friends at this time...Thank you

82

91

534



ChalkDog
@ChalkDogLines

Replying to @zh_fj @GovMattBevin and @YoungWood609

I agree with respect to family members. However, this disaster of a human deserves no quarter. Claimed to raise the dead. Didn't. Claimed to give last rights at 9/11. Didn't. Claimed not to have sexually abused a minor. Did. I think Ivanka said it. Special place in hell for him

12/14/17, 6:44 PM

Tweet your reply



AT&T LTE

5:37 PM

43%



Tweet



People Person
@jbornallah

You mean suicide.

A fake Conservative Preacher who was
a #Pedophile. He lived without honor
and he died without honor.

May his victims find comfort in his
death.

Governor Matt Bevin @GovMattBevin

Saddened to hear of tonight's death of KY
Representative Dan Johnson...My heart
breaks for his family tonight...These are
heavy days in Frankfort and in America...May
God indeed shed His grace on us all...We su...

12/14/17, 4:45 AM



Tweet your reply



AT&T LTE

5:30 PM

@ 45%



Tweet



329

594

1,751



Gabby

@TheLadyGabby



Replying to @GovMattBevin

Saddened to hear a young woman was molested by Representative Dan Johnson...My heart breaks for the young woman tonight...These are heavy days in Frankfort and in America...May God indeed shed His grace on us all...Sexual Abuse victims sure need it...

12/13/17, 8:52 PM

12 Retweets 111 Likes



DeplorableCharlieGrl @Charliegi... · 17h

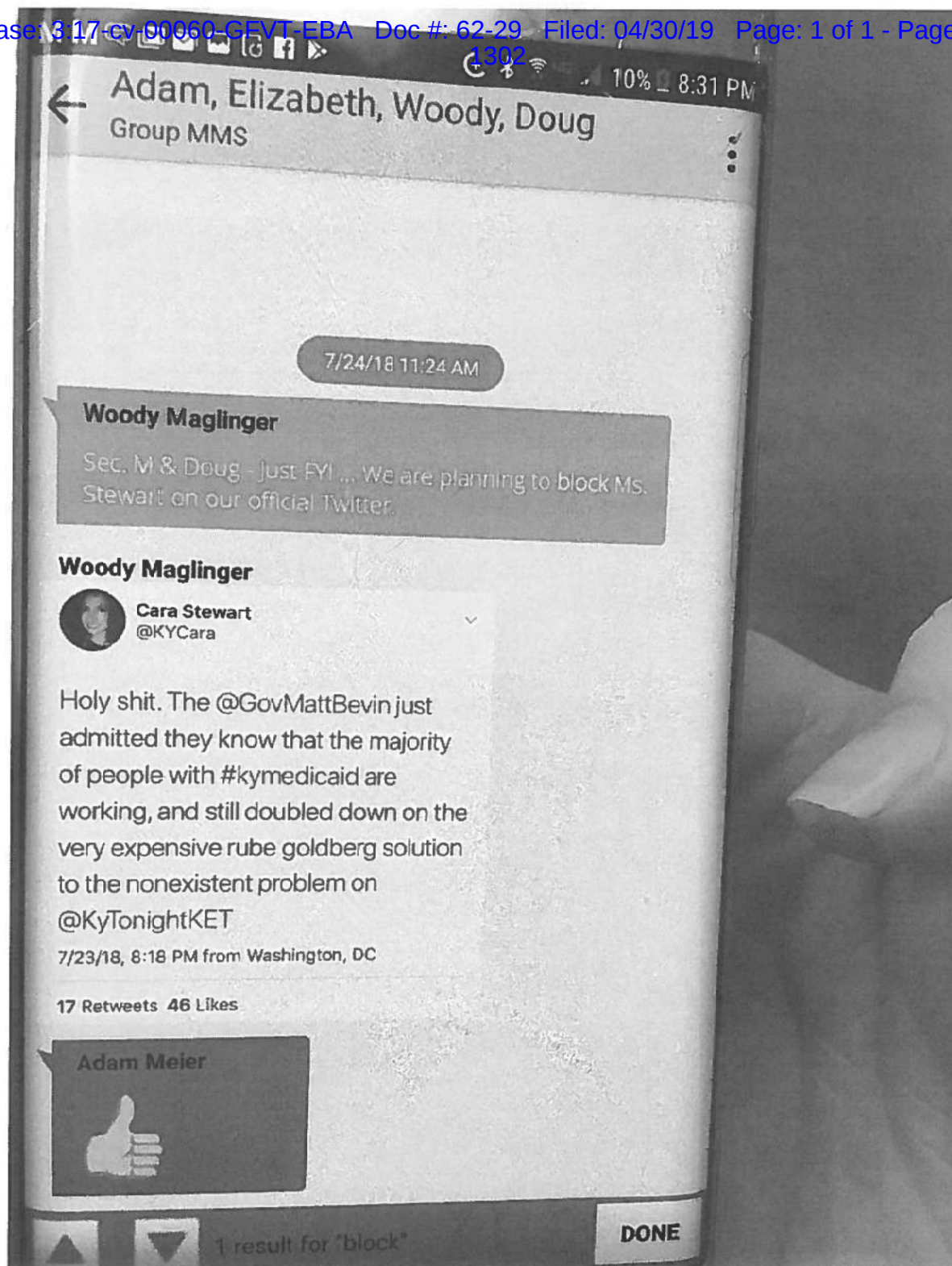



Replying to @TheLadyGabby and @GovMattBevin

Tweet your reply



GOV001665



 **Sean Hiler** @sean_hiler · 4m

@GovMattBevin wtf is wrong with you this isnt the fist time I've seen you blocked someone for speaking about medical cannabis for not even giving a shit about what they have to say your a disgrace to be where you are this is PATHETIC of you!!!! #VoteYouOut twitter.com/270CJ/status/9...

This Tweet is unavailable.





zane

@zanebrammell

Follow



Wait is stacking the Board of Education one of @GovMattBevin responsibilities? Who gave this man the task considering he doesn't give a shit about public education? Teachers shouldn't be fighting this alone. The future of education is at stake people!

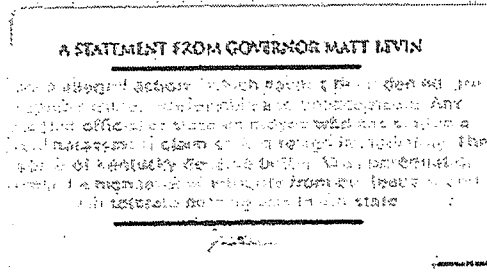
7:37 AM - 18 Apr 2018



 Twitter, Inc. Tweet**What I Really Mean:**

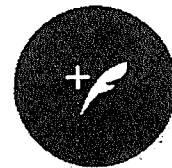
@Transl8ForYou

Well, shit...now that the cat's outta the bag, I guess we have to apologize & act horrified about stuff we've known about forever.

Governor Matt Bevin  @GovMattBevin

Statement from Gov.
Matt Bevin on Alleged
Misconduct from

6:44 PM · Nov 5, 2017



GOV001580



Cara Stewart

@KYCara

Follow



Holy shit. The @GovMattBevin just admitted they know that the majority of people with #kymedicaid are working, and still doubled down on the very expensive rube goldberg solution to the nonexistent problem on @KyTonightKET

8:18 PM - 23 Jul 2018 from Washington, DC

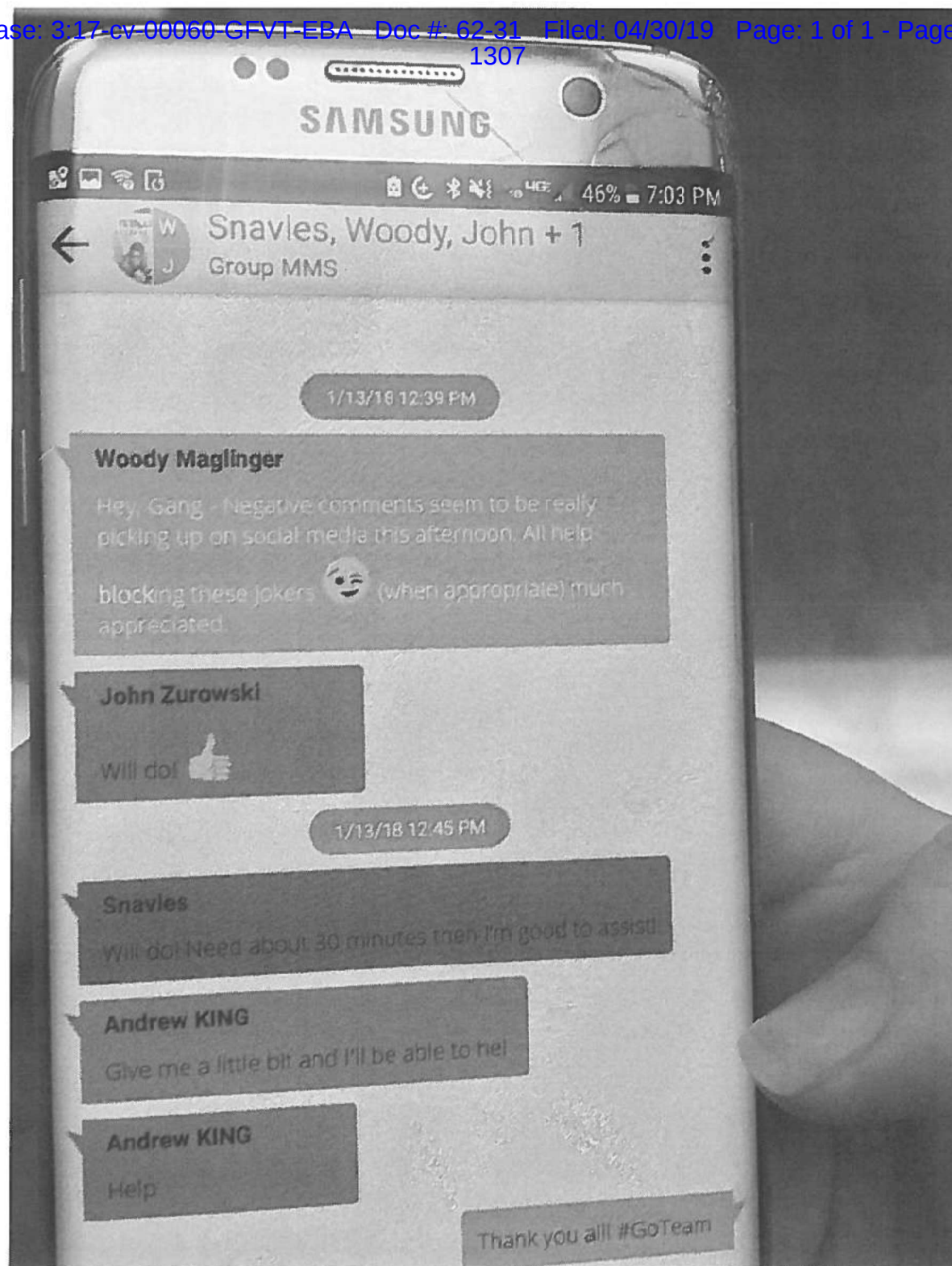
17 Retweets 47 Likes



6 17 47

GOV000772

1307



1/13/18 12:39 PM

Woody Maglinger

Hey, Gang - Negative comments seem to be really picking up on social media this afternoon. All help blocking these jokers 😊 (when appropriate) much appreciated.

John Zurowski

Will do! 👍

1/13/18 12:45 PM

Snavles

Will do! Need about 30 minutes then I'm good to assist.

Andrew KING

Give me a little bit and I'll be able to help

Andrew KING

Help

Thank you all! #GoTeam

[illegible]

[illegible]

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF KENTUCKY
3 CENTRAL DIVISION AT FRANKFORT

4 DREW MORGAN and MARY HARGIS)

5 Plaintiffs,)

6 -v-)

7 MATT G. BEVIN, in his official)
8 capacity as Governor of)
9 Kentucky)

Defendant.)

CASE NO.
3:17-cv-00060

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11
12
13 The deposition upon oral examination of
14 **CATHERINE EASLEY**, a witness produced and sworn before
15 me, Tamara Duvall-McClain, CCR, RPR, Notary Public in
16 and for the County of Jefferson, State of Kentucky,
17 taken on behalf of the Plaintiffs at the offices of
18 Kaplan Johnson Abate & Bird, 710 West Main Street,
19 Fourth Floor, Louisville, Kentucky, on November 2,
20 2018, at 9:34 a.m., pursuant to the Federal Rules of
21 Civil Procedure.
22
23
24
25

1 the grass --

2 Q -- is Castro's evil son and is the devil, whether
3 that would be off topic?

4 A No, because it's the Governor's page and he's
5 always a topic, so I would have left those.

6 Q Okay.

7 A If they called him -- again, if it was a
8 four-letter word or said the Governor is BS.

9 Q I'm handing you what's previously been marked
10 Exhibit 8 and Exhibit 9. We'll look at Exhibit 8.
11 And this is another screen shot from Governor
12 Bevin's account; is that correct?

13 A Yes.

14 Q And this post shows a picture of a sunset and says
15 "We are thankful for our beautiful Kentucky home;"
16 correct?

17 A Correct.

18 Q What would be the topic of this post?

19 A State pride, being thankful for a beautiful
20 Kentucky home.

21 Q Okay. Just looking at 8, we can't see any
22 comments; correct?

23 A Correct.

24 Q Okay. Can you just tell me -- there are some
25 notations underneath the picture with some numbers

1 A Repeated off topic. I mean, again, we're -- it's
2 off topic, so I would hide it here, but it's, you
3 know.

4 Q If Governor Bevin is always on topic, then
5 wouldn't an election of Governor Bevin be on
6 topic?

7 A Not on his official page.

8 Q And then the last one we have, 25, we have a post
9 saying "Two years ago today we began a fresh start
10 together as one Kentucky. Thank you for the
11 opportunity to serve as your Governor." Are any
12 of the comments below that off topic?

13 A Yes.

14 Q Which one?

15 A Barbara Weatherly.

16 Q And what's off topic about that?

17 A It doesn't have to do with the fresh start or --
18 well, actually, no, it's on topic. I mean, part
19 of his job is to appoint, and he serves as
20 Governor, so, no, it's not off topic.

21 Q Can you tell me about what the purpose of Governor
22 Bevin's social media presence is?

23 A To inform his constituents of his positions on
24 policies, to get his message out, to provide
25 information.

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY

ELECTRONICALLY FILED

DREW MORGAN and MARY HARGIS,

Plaintiffs,

v.

MATT G. BEVIN, in his official capacity as
Governor of Kentucky,

Defendant.

No. 3:17-cv-00060-GFVT-EBA

ORDER

This matter having come before the Court upon the Motion of the Plaintiffs, Drew Morgan and Mary Hargis, for Summary Judgment to be entered in favor of the Plaintiffs, and the Court having reviewed the record, applicable law, and being sufficiently advised, the Court finds that there is no genuine dispute as to any material fact and Plaintiffs are entitled to judgment as a matter of law.

Therefore, **IT IS HEREBY ORDERED AND ADJUDGED** that the Motion for Summary Judgment filed by Plaintiffs is **GRANTED** as to all claims set forth in the Complaint.

IT IS FURTHER ORDERED AND ADJUDGED:

1. Defendant Matt G. Bevin, in his official capacity as Governor of Kentucky is permanently enjoined from enforcing the policy of permanently blocking individuals from participating in his official social media fora: Gov. Matt Bevin (Facebook) and @GovMattBevin (Twitter);
2. Defendant shall within ten (10) days from the date of this Order, restore access to all individuals and organizations who have been permanently blocked from participating on those online fora;

3. The Court hereby finds that the Plaintiffs are the prevailing party in this action and are entitled to recover their reasonable costs, disbursements and attorneys' fees from Defendant pursuant to 42 U.S.C. § 1988, in such amount as will be determined upon the resolution of subsequent motions made to the Court.

The Clerk of the Court is hereby directed to enter judgment in favor of Plaintiffs. This order is final and appealable.

IT IS SO ORDERED.

Morgan v. Bevin
Case No. 3:17cv00060

Index of Exhibits Used in Support of Plaintiffs' Motion for Summary Judgment

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5	Def.'s Discovery Responses
6	D. Morgan Deposition Excerpts
7	July 11, 2017 ACLU to Bevin Letter
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18	Examples of users blocked responding to Gov. Bevin's Oct. 2, 2017 tweet
19	Examples of users blocked for unclear reasons
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28	Examples of users blocked responding to Dan Johnson post
29	July 24, 2018 Maglinger text
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