

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ALEXIS WILKINS,

Plaintiff,

v.

KYLE M. SERAPHIN,

Defendant.

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Case No. 1:25-cv-1375

ORAL ARGUMENT REQUESTED

**DEFENDANT KYLE M. SERAPHIN’S MOTION TO DISMISS
PLAINTIFF’S ORIGINAL COMPLAINT**

In her Complaint, Plaintiff Alexis Wilkins (“Ms. Wilkins”) is targeting Defendant Kyle M. Seraphin, a well-known conservative Catholic journalist and podcaster, former Federal Bureau of Investigation (“FBI”) Special Agent, and government whistleblower, whose popular podcast “The Kyle Seraphin Show” attracts a large audience hungry for independent-minded, conservative political commentary. Ms. Wilkins is attempting to use Mr. Seraphin’s humorous, sarcastic, and hyperbolic reference to news stories about Ms. Wilkins and her boyfriend, FBI Director Kash Patel (“Director Patel”), as a means of punishing and stifling Mr. Seraphin’s free speech and criticism of Director Patel in Mr. Seraphin’s podcast. On the Complaint’s face, those statements do not constitute defamation. Thus, Mr. Seraphin moves to dismiss the complaint under Federal Rule of Civil Procedure 12(b)(6) because it fails to demonstrate that he (1) made any statements of fact (2) with actual malice. This Court should grant this motion.

I. INTRODUCTION

Mr. Seraphin is a former FBI agent-turned-podcaster who is successful in large part because of his insightful, witty, humorous, tongue-in-cheek commentary about the operation of the U.S. government including the FBI. In an August 22, 2025 podcast episode of “The Kyle

Seraphin Show,” titled “DESPERATE FBI Director Digs Deep into . . . John Bolton’s Mustache?,” Mr. Seraphin briefly discussed Director Patel’s relationship with Ms. Wilkins, asking in joking, hyperbolic fashion why Ms. Wilkins, who is much younger than Director Patel, would be dating Director Patel if it were not for his position as the leader of the FBI. In doing so, Mr. Seraphin discussed a well-known fact—Ms. Wilkins herself acknowledges that her relationship with the FBI Director is “public” and “widely known” and acknowledges that other news commentators discussed these same topics before Mr. Seraphin (Dkt. 1, ¶¶ 7, 11).

Her Complaint openly acknowledges that Mr. Seraphin’s statements were “ridiculous” and “ludicrous”—which alone demonstrates they cannot constitute defamation because a reasonable person would not have believed them to be fact. (Dkt. 1, ¶¶ 14, 23). As explained below, long before Mr. Seraphin ever made these remarks, Ms. Wilkins responded to other media commentators with large followings who gave much more pointed commentary on these topics, laughing it off and chalking it up to the life of a “public figure.” But while she is fine with her and others conversing publicly about these topics, she does not want Mr. Seraphin to do so. This Court should reject Ms. Wilkins’ effort to single out Mr. Seraphin and suppress his free speech because she has failed to—and, indeed, cannot—state a proper claim for defamation based on Mr. Seraphin’s “ridiculous” and “ludicrous” podcast statements.

II. BACKGROUND FACTS

A. Mr. Seraphin, a Former FBI Special Agent, Is a Prominent Conservative Commentator, with a Sarcastic, Hyperbolic Style, Who Is Widely Known As An Influential Critic of Director Patel.

Mr. Seraphin is a veteran of the U.S. Air Force. From June 2016 until June 2022, he served as an FBI Special Agent, receiving regular promotions, as well as annual awards for his performance on duty and for work beyond the scope of duty. While serving as a member of the

FBI's Counterintelligence Division¹ in Washington DC, he requested and received a transfer to the FBI's Washington Field Office ("FBI WFO") Intelligence Division. FBI WFO is a significant office within the FBI because it is responsible for all manners of investigations into federal crimes in the National Capital Region. During his tenure at FBI WFO, Mr. Seraphin gained a deep understanding of the FBI WFO's senior management, policies, protocols, procedures, and key personnel.

Between late 2021 and late 2022, Mr. Seraphin gained national notoriety as a "whistleblower" for refusing to participate in the FBI's mandatory vaccine policy and for reporting what he alleged to be potential perjury by Attorney General Merrick Garland in connection with the Attorney General's remarks to Congress concerning the use of Counterterrorism Resources assigned to parents protesting at schoolboard meetings nationally. On June 1, 2022, the FBI permanently suspended Mr. Seraphin from his position, after which he gave his first public interview in September 2022 about his whistleblower activity. (*See* Spencer Brown, *Whistleblower: FBI Putting 'Threat Tags' on Parents Protesting School Boards*, HOUSE JUDICIARY COMMITTEE REPUBLICANS (Nov. 16, 2021, 4:45 P.M.), <https://judiciary.house.gov/media/press-releases/whistleblower-fbi-putting-threat-tags-on-parents-protesting-school-boards>, attached hereto as Exhibit A).

In January 2023, Mr. Seraphin started podcasting as the host of the "Kyle Seraphin Show," a podcast that airs weekly on various media platforms. Mr. Seraphin describes himself in every episode of the show's introduction as a "civil liberties enthusiast, Second Amendment defender,

¹ Contrary to Ms. Wilkins' Complaint, Mr. Seraphin never served in the FBI's Counterterrorism Division. (*See* Dkt. 1, ¶ 8). Nor did Mr. Seraphin ever "personally [meet] Ms. Wilkins with Mr. Patel at a conservative political event roughly two years ago"—or at any other time—because Mr. Seraphin has never met Ms. Wilkins. (*Id.* ¶ 14).

and recovering FBI agent.” (See, e.g., Exhibit B, Transcript of The Kyle Seraphin Show, DESPERATE FBI Director Digs Deep into...John Bolton’s Mustache? | Ep 637, p. 1, 00:11).

He has appeared in hundreds of print publications, television interviews, radio shows, and podcasts.

Using this platform he created with his resources, including information from government contacts and former FBI agents, he has called out what he believes to be the improper, politically motivated use of the FBI and other government resources. For example, in February 2023, he made national news by exposing an FBI intelligence internal memorandum from the FBI’s Richmond Division that linked “radical traditionalist Catholics” with white supremacists, which served as the focal point of a Congressional investigation on these topics. (See Kyle Seraphin, *The FBI Doubles Down on Christians and White Supremacy in 2023*, UNCOVERDC (Feb. 8, 2023), https://uncoverdc.com/2023/02/08/the-fbi-doubles-down-on-christians-and-white-supremacy-in-2023#google_vignette, attached hereto as Exhibit C; Committee on the Judiciary and the Select Subcommittee on the Weaponization of the Federal Government, *The Weaponization of “Disinformation” Pseudo-Experts and Bureaucrats: How the Federal Government Partnered with Universities to Censor Americans’ Political Speech*, HOUSE JUDICIARY COMMITTEE (Nov. 6, 2023), <https://judiciary.house.gov/sites/evo-subsites/republicans-judiciary.house.gov/files/2024-12/Part-3-Final-Weaponization-Report-Compilation.pdf>).

Mr. Seraphin has been a vocal critic of Director Patel’s decision to promote longtime FBI Agent Steven Jensen to a senior position at the FBI WFO, citing Mr. Jensen’s role in overseeing the handling of the January 6th prosecutions. According to a recent court filing in the District of Columbia, as a result of the widespread criticism of Director Patel’s decision to promote Mr. Jensen, Director Patel urged Mr. Jensen to sue “the more prominent online personalities for

defamation,” including Mr. Seraphin, as a means of “tak[ing] the political pressure off of [Director Patel] for his decision to promote Jensen.” *See Driscoll, et al. v. Patel, et al.*, Case No. 1:25-cv-03109 (USDC), Dkt. 1 at ¶¶ 122, 127, page 35 n.6 (stating that “one of the online personalities [Director] Patel suggested Jensen sue had coincidentally also been fixated on Plaintiff Spencer Evans, as discussed in further details herein”) & page 42 n.8 (identifying Mr. Seraphin as the online personality who purportedly was fixated on Mr. Evans). According to this Complaint filed by former FBI agents, Director Patel offered to “connect [Mr.] Jensen with defamation attorneys.” *Id.* ¶ 127.

In this way, Mr. Seraphin serves as a strong, insightful, and independent voice who offers a critical perspective that is different from that espoused by current FBI leadership. His reporting has also put him in the crosshairs of Ms. Wilkins and her powerful boyfriend, Director Patel.

B. Ms. Wilkins, a Self-Described “Country Music Artist” and “Conservative” Political Activist, Publicly Brushed Off the Exact Same Allegedly Defamatory Statements Forming the Basis of This Lawsuit—Long Before Mr. Seraphin Ever Sarcastically Mentioned Those Topics on His Show.

Since at least July 2009, Ms. Wilkins has been in the entertainment industry. Ms. Wilkins describes herself as a “country music artist,” “published writer,” and “conservative” political activist. (Dkt. 1, ¶ 7). In January 2023, Ms. Wilkins began a romantic relationship with Director Patel—which Ms. Wilkins describes as “widely known” and the subject of “public knowledge.” (Dkt. 1 ¶¶ 7, 11).

Starting no later than February 2025, based on certain features of Ms. Wilkins’ and her employer PragerU’s background, news commentators, journalists, and others began expressing opinions and making jokes that she is an Israeli or “Mossad” agent and “honeypot” who is only in a relationship with Director Patel to obtain sensitive information from him.

On February 23, 2025, for example, @BasedSamParker, a social media influencer account on X with over 79,000 followers, posted a viral thread that gathered over 2.5 million impressions.

The post stated, among other things:

1/ WHO IS ALEXIS WILKINS—Girlfriend of Kash Patel? Alexis Wilkins was a devout 24-yr old Christian when she met Kash Patel, a 42-yr old Hindu Muslim & started dating him. Now he's the FBI director. She's also the press secretarty [sic] for Abraham Hamadeh, a Syrian Muslim member of the US House of Representatives from Arizona, and a "former" member of US Military Intelligence. She's also a country music singer based out of Nashville. She works for PragerU, is tight with The Daily Wire, & has ties to TPUSA[.] She hosts her own news & political commentary show on Rumble. Let's take a closer look at Alexis, pictured here 3 weeks after meeting Kash Patel in 2022.

6/ Isreali [sic] Influence: PragerU & Daily Wire PragerU is run by Marissa Streit, who served in the IDF Unit 8200 (roughly equivalent to the NSA)—who has sworn an oath of loyalty to israel [sic]. IOW, PragerU is an operation of israeli [sic] intelligence. Everyone knows about The Daily Wire and where their allegiance belongs.

(See Sam Parker (@BasedSamParker), X.com (Feb. 24, 2025, 3:57 A.M.), <https://archive.ph/h7X2v>; <https://x.com/BasedSamParker/status/1893872813930655996>, attached hereto as Exhibit D).²

Likewise, on February 28, 2025, @IanMalcolm84, a social media account on X with over 95,000 followers, posted: "'Boy, do I hate being right all the time' @Kash_Patel's girlfriend works with the JEWISH founded @prageru whose CEO was in the ISRAELI DEFENSE FORCE & 8200 INTELLIGENCE AGENCY? Can we spell 'handler'?" The post registered over 116,000 impressions. (Ian Malcolm, (@IanMalcolm84), X.com (Feb. 28, 2025, 3:01 P.M.), <https://x.com/IanMalcolm84/status/1895580008594489794>, attached hereto as Exhibit E).

² Mr. Seraphin requests that the Court take judicial notice of this, and other posts described herein, and related podcast interviews, newspaper articles, government documents, and court filings—not for their truth, but as evidence that the statements were made. *See* FED. R. EVID. 201(b)(2); *see also* *Lovelace v. Software Spectrum*, 78 F.3d 1015, 1018 (5th Cir. 1996). Mr. Seraphin further asks that, regardless of what the Court considers in terms of documents, exhibits, or other citations, it not transform this motion to dismiss into a motion for summary judgment.

On July 7, 2025, Dr. Simon Goddek, another prominent X commentator who has over 1.1 million followers, referred to Ms. Wilkins as a “classic honey pot,” stating: “Exactly. Alexis Wilkins is twenty years younger than Kash and works for an NGO that’s basically Israeli intelligence. And seriously, why would an attractive young woman date a not so attractive Indian American? **Classic honey pot.**” (Dr. Simon Goddek (@goddeketal), X.com (Jul. 7, 2025, 4:22 P.M.), <https://archive.ph/D0BuC#selection-613.0-613.229>, <https://x.com/goddeketal/status/1942257954251473210> (emphasis added), attached hereto as Exhibit F).

On July 10, 2025, in a post that gathered more than 574,000 views, Ms. Wilkins addressed this extensive public commentary, stating:

I’ve spent my career saying no to anything that would compromise my character and working to restore America. It’s disappointing to see people with no real contribution to political discourse spin ridiculous conspiracy theories out of thin air. These accusations are obviously insanely ridiculous and coming from accounts that are farming because their engagement dried up after Trump’s win.

(Alexis Wilkins (@AlexisWilkins), X.com (Jul. 9, 2025, 3:50 P.M.), <https://archive.ph/MO27T>; <https://x.com/AlexisWilkins/status/1943050167130746916>, attached hereto as Exhibit G).

Director Patel’s personal spokesperson and publicist, Erica Knight, responded to Ms. Wilkins’ post, using the exact same allegedly defamatory language that is the subject of this lawsuit, stating: “For anyone still curious: Kash Patel was never married and did not leave the imaginary children from this nonexistent marriage in a nonexistent luxury Hamptons mansion for a (not Jewish, Christian country singing) **Mossad Honeypot.**” (Erica Knight (@_EricaKnight), X.com (Jul. 11, 2025, 12:30 A.M.), <https://archive.ph/ZKk0V>; https://x.com/_EricaKnight/status/1943467906907672946 (emphasis added), attached hereto as Exhibit H).

C. Before Mr. Seraphin Ever Made Any Comments, Ms. Wilkins Participated In High-Profile Media Interviews, Calling The Rumors “Funny” and “Truly Hilarious” and Laughing About the Situation.

On July 30, 2025, Ms. Wilkins participated in a video interview with high-profile media personality Megyn Kelly on “The Megyn Kelly Show,” titled “Country Singer and Kash Patel’s Girlfriend Alexis Wilkins on the Need to Speak Out About What’s True.” In this interview, Ms. Wilkins directly addressed opinions that she is “an Israeli spy” and “work[s] for Mossad.” (*See Megyn Kelly, Country Singer and Kash Patel’s Girlfriend Alexis Wilkins on the Need to Speak Out About What’s True, The Megyn Kelly Show* (Jul. 30, 2025), <https://www.youtube.com/watch?v=kCQkaSxMtcQ>; Exhibit I, Transcript of The Megyn Kelly Show, *Country Singer and Kash Patel’s Girlfriend on the Need to Speak Out About What’s True*, at p. 1, 01:02-01:49). Ms. Wilkins acknowledged that she understood how people could reach the wrong conclusions based on certain “pieces of evidence” about her, explaining, “people see certain pieces and I get it. They want to connect things . . . there’s pieces of this that, you know, I can, I, I understand but I think that they have taken just these pieces of evidence that you laid out and tied them together in all of the wrong ways.” (*Id.* at p. 1, 01:52-02:11).

During the interview, Ms. Wilkins specifically addressed prior suggestions, based on facts in her background, that she is a “honeypot” spy. She laughed it off and agreed with Ms. Kelly that she would have been “really playing the long game” given that Ms. Wilkins met Director Patel some time before he was appointed to this position. (*Id.* at p. 2, 05:39-05:43). Ms. Wilkins further stated that she did not understand how people could misunderstand her background because she has lived her life “very publicly.” (*Id.* at p. 2 6:16-6:23). This video interview received over 116,000 views.

That same day, in a separate video interview on “The Megyn Kelly Show” titled “FBI Director Kash Patel’s Girlfriend Alexis Wilkins Responds to Internet Trolls Who Say She’s

Mossad,” Ms. Kelly played online video commentary for Ms. Wilkins from an online media “influencer” personality who summarized the claim that Ms. Wilkins is part of an Israeli “honeypot” operation connected with PragerU. (Megyn Kelly, *FBI Director Kash Patel’s Girlfriend Alexis Wilkins Responds to Internet Trolls Who Say She’s Mossad*, The Megyn Kelly Show (Jul. 30, 2025), <https://www.youtube.com/watch?v=S10WGaxrSII>; Exhibit J, Transcript of The Megyn Kelly Show, *FBI Director Kash Patel’s Girlfriend Alexis Wilkins Responds to Internet Trolls Who Say She’s Mossad*, at p. 1, 00:52-02:22).

After playing the video, Ms. Kelly acknowledged PragerU’s CEO’s affiliation with Israeli military intelligence but stated “there is nothing like that about [Ms. Wilkins].” (*Id.* at p. 1, 02:22-02:41). Appearing to acknowledge PragerU’s connection with Israeli military intelligence, Ms. Wilkins responded, among other things, “I knew that, you know, that Prager was, this is kind of something that, I think, people on the deep sides of the internet like to pick at, you know, when they can’t figure out what else is wrong, so, uh, some of it didn’t surprise me when it first started coming up.” (*Id.* at p. 2, 02:50-03:03). Ms. Wilkins concluded that such rumors are part of the life of a “public figure,” stating, “I’ve been a public figure for long enough to see, you know, people try to pick at my, you know, family, try and find people online. This is something that people do.” (*Id.* at p. 2, 6:06-06:15). This video interview received over 145,000 views.

On August 4, 2025, Ms. Wilkins participated in a video interview with songwriter journalists on the “Try That In a Small Town Podcast,” titled “Bison Heads and Spy Accusations – A Chat w/Alexis Wilkins.” (*Bison Heads and Spy Accusations – A Chat w/ Alexis Wilkins :: Ep 67, Try That in a Small Town Podcast* (Aug. 4, 2025), <https://www.youtube.com/watch?v=ZipsSEtZb84>). An interviewer asked Ms. Wilkins, “Would you ever consider getting into politics?” (*See* Exhibit K, Transcript of Try That in a Small Town

Podcast, *Bison Heads and Spy Accusations – A Chat w/ Alexis Wilkins :: Ep 67*, p. 1, 25:24-25:30). Another interviewer responded, “She already is,” prompting laughter by all. (*Id.* at p. 1, 25:31). They then asked Ms. Wilkins, “Can you still run for office if you’re a spy?”—prompting more laughter by all and another interviewer to say, “That’s a great question.” (*Id.* at p. 1, 26:46-26:52.) Ms. Wilkins joined in the hilarity, stating, “Someone had to take the air out of the balloon.” (*Id.* at p. 2, 26:59). One of the interviewers stated, “Knowing you, it gave me a really good laugh, because if you are a spy, you’re a really good spy—you’re like a super good spy,” to which Ms. Wilkins agreed, stating “I should have taught classes, honestly, yeah.” (*Id.* at p. 2, 27:06-27:15). During this exchange, Ms. Wilkins stated, “it’s funny,” and “[y]eah, there’s elements of it that I think are truly hilarious.” (*Id.* at p. 2, 27:15-27:29).

During this same interview, Ms. Wilkins expressed surprise that she has received negative commentary from conservatives, stating, “I always thought that the left would, would cancel me, but apparently, I was too educational and brought too many people over to our side and it was the right thinking they found something instead.” (*Id.* at p. 2, 29:13-29:23). This prompted an interviewer to state, “There are stupid people all over,” to which Ms. Wilkins responded, “They’re all over the place—they hand that stuff out for free.” (*Id.* at p. 2, 29:23-29:29). In these ways, Ms. Wilkins both (1) acknowledged that there were facts in her background that people could connect to make these suggestions, and (2) personally joked about and made fun of the suggestions.

D. After Mr. Seraphin Sarcastically Referenced These Rumors On His Podcast—All in the Context of Criticizing Director Patel—Ms. Wilkins Filed This Suit.

On August 22, 2025, in an episode of the “The Kyle Seraphin Show” that was especially critical of Director Patel, Mr. Seraphin interviewed former FBI Agent and whistleblower Stephen Friend. (Kyle Seraphin, *DESPERATE FBI Director Digs Deep into...John Bolton’s Mustache?* / *Ep 637, The Kyle Seraphin Show* (Aug. 22, 2025),

<https://open.spotify.com/episode/2bXjDPd8geMIKS8nyLhE9F?si=db7d3f08388d42ad&nd=1&lsi=3a10bef3c08c455c>). Mr. Seraphin and Mr. Friend discussed various challenges facing Director Patel’s FBI administration and the likelihood that Director Patel is “about to get replaced” by newly appointed FBI Co-Deputy Director Andrew Bailey. (*See* Exhibit B, p. 2, 13:08-13:15).

Mr. Seraphin asked Mr. Friend, “Is it fair that you share the same analysis that I do that there is no chance you bring in somebody [Andrew Bailey] to help you with your job because you are doing a great job?” (*Id.* at p. 2, 13:47-13:56). In response, Mr. Friend said, “No, I think that that’s spot on—and particularly because of the individual that was brought in, him being in those discussions to take the top helm there. That to me speaks very loudly.” (*Id.* at p. 2, 13:57-14:06).

During this episode, Mr. Seraphin and Mr. Friend also discussed journalist Kerry Picket’s March 3, 2025, article, “Kash Patel disputes whistleblower revelation about FBI ‘honeypot’ agent spying on Trump campaign,” citing Director Patel’s dispute about the use of the term “honeypot” to describe a female undercover FBI agent. (Kerry Picket, *Kash Patel disputes whistleblower revelation about FBI ‘honeypot’ agent spying on Trump campaign*, The Washington Times (Mar. 3, 2025), <https://www.washingtontimes.com/news/2025/mar/3/kash-patel-disputes-whistleblower-revelation-fbi-honeypot-agent/>, attached hereto as Exhibit L). Mr. Seraphin took issue with Director Patel’s defense of the FBI, as well as Ms. Picket’s definition of “honeypot” as “an undercover operative who feigns sexual or romantic interest to obtain information from a target.” (Exhibit B, p. 5, 1:01:10-1:01:18). Mr. Seraphin stated: “[a honeypot is] not necessarily that. It’s that the possibility exists because the person actually presents, like, an attraction. You don’t have to actually feign anything, um, and the FBI has no problem using these by the way if you follow Trevor Aaronson and the ‘Alphabet Boys’ thing that happened in Denver.” (*See id.* at p. 5, 1:01:19-1:01:35.; *see also* Trevor Aaronson, *The FBI Used an Undercover Cop With Pink*

Hair to Spy on Activists and Manufacture Crimes, The Intercept (Mar. 21, 2023, 6:00 A.M.), <https://theintercept.com/2023/03/21/fbi-colorado-springs-surveillance/>, attached hereto as Exhibit M).

Mr. Seraphin sarcastically stated that “Kash Patel takes umbrage with the word ‘honeypot,’ not anything else,” implying that Director Patel should instead be concerned about the FBI’s improper use of “honey pot” investigative tactics. (Exhibit B, p. 6, 1:02:13-1:02:17). Mr. Seraphin also took the position that senior FBI agents who personally participated in undercover “honeypot” investigations should not hold management positions within the FBI. (*Id.* at p. 5, 1:00:40).

In the context of this larger discussion, Mr. Seraphin made the following sarcastic, tongue-in-cheek remarks, which were plainly not made with malice or animus against Ms. Wilkins:

[Director Patel has] had his own little honeypot issue that’s been going on of late. So we’re just gonna acknowledge it real publicly. He’s got a girlfriend that’s half his age who apparently is both a country music singer, a political commentator on Rumble, a friend now of John Rich through [Dan] Bongino, who also owns a big chunk of Rumble, and she’s also a former Mossad agent in what is like the equivalent of their NSA. But I’m sure that’s totally because like she’s really looking for like a cross-eyed, you know, kind of thickish built, super cool bro, who’s almost 50 years old, who’s Indian in America. Like it has nothing to do with the fact that we’re really close to the Trump administration. Anyway, I’m sure that that’s totally just like love. That’s what real love looks like.

(*Id.* at p. 6, 1:01:59-1:03:00).

Mr. Seraphin then speculated that, to Director Patel’s detriment, FBI agents from the New York Field Office convinced Director Patel to take issue with the term “honeypot” as a means of undermining and discrediting him, and made other comments critical of Director Patel. (*Id.*; *see also id.* at p. 8, 1:11:44-1:11:58) (“I think [Patel] freaked the hell out and realized that his tenure and his smiling celebration of Andrew Bailey becoming the Co-Deputy Director was actually him smiling and, and, like congratulating his own replacement whether he realized it or not.”)).

On August 25, 2025, Toria Brooke (@realToriaBrooke), a conservative social media influencer with connections to Ms. Wilkins and Director Patel, posted on Mr. Seraphin's remarks, causing them to be widely circulated. (See Toria Brooke (@realToriaBrooke), X.com (Aug. 25, 2025, 8:34 P.M.), <https://archive.ph/2025.08.30-165545/https://x.com/realtoriabrooke/status/1960153785923149874#selection-615.0-657.235> (receiving over 182,300 views), attached hereto as Exhibit N). On August 27, 2025, five days after Mr. Seraphin's episode aired and two days after Ms. Brooke's post, Ms. Wilkins pounced—filing this defamation lawsuit against Mr. Seraphin in which she paradoxically claims that he defamed her but that his statements were “ridiculous” and “ludicrous” such that no one could believe them. This motion follows.

III. ARGUMENTS AND AUTHORITIES

A. The Applicable Legal Standards Require More than Conclusory Statements to Support a Legal Cause of Action.

“[O]nly a complaint that states a plausible claim for relief survives a motion to dismiss.” *Ashcroft v. Iqbal*, 556 U.S. 662, 679 (2009). In deciding a Rule 12(b)(6) motion, the “court accepts ‘all well-pleaded facts as true, viewing them in the light most favorable to the plaintiff.’” *Martin K. Eby Constr. Co. v. DART*, 369 F.3d 464, 467 (5th Cir. 2004) (quoting *Jones v. Greninger*, 188 F.3d 322, 324 (5th Cir. 1999) (internal quotations omitted)). A court is not required to accept legal conclusions, conclusory statements, or naked assertions devoid of further factual enhancement as true. *Iqbal*, 556 U.S. at 678.

“Generally, a court ruling on a [12(b)(6)] motion to dismiss may rely only on the complaint and its proper attachments,” as well as “documents incorporated into the complaint by reference, and matters of which a court may take judicial notice.” *Dorsey v. Portfolio Equities, Inc.*, 540 F.3d 333, 338 (5th Cir. 2008) (citations omitted). “In considering a 12(b)(6) motion, the Court can

properly consider the transcripts of the podcast attached to Defendants’ Motion because the allegedly defamatory statements were made in the podcast.” *Parker v. Spotify USA, Inc.*, 569 F. Supp. 3d 519, 528 (W.D. Tex. 2021) (“Plaintiff’s Complaint referred to the podcast throughout and the podcast is central to Plaintiff’s claims, so the podcast and its transcripts can be considered for the 12(b)(6) Motion”).

B. Under These Standards, Plaintiff’s Defamation Claim Fails as a Matter of Law.

Ms. Wilkins’ Complaint alleges one claim—defamation—despite the fact that Mr. Seraphin’s statements were clearly sarcastic, tongue-in-cheek, and hyperbolic. To establish a cause of action for defamation, Ms. Wilkins must adequately allege that Mr. Seraphin (1) published a statement, (2) that was defamatory concerning the plaintiff, (3) while acting with the requisite degree of fault, and (4) in some cases, that the statement proximately caused damages. *See WFAA-TV, Inc. v. McLemore*, 978 S.W.2d 568, 571 (Tex. 1998); *In re Lipsky*, 460 S.W.3d 579, 593 (Tex. 2015). As a matter of law and based on her own pleadings, Ms. Wilkins cannot establish that the statement was defamatory or that Mr. Seraphin acted with the requisite degree of fault. Thus, her Complaint cannot survive this motion to dismiss.

1. Mr. Seraphin’s Sarcastic, Humorous, and Hyperbolic Statements That Ms. Wilkins Is a “Honeypot” and “Former Mossad Agent” Are Not Defamatory.

Whether a statement is capable of the defamatory meaning a plaintiff alleges is a question of law. *Double Diamond, Inc. v. Van Tyne*, 109 S.W.3d 848, 854 (Tex. App.—2003). “[D]efamation claims involving humor in general, and satire in particular, raise important issues pertaining to free speech” because “[h]umor is an important medium of legitimate expression and central to the well-being of individuals, society, and their government.” *New Times, Inc. v. Isaacks*, 146 S.W.3d 144, 151 (Tex. 2004) (quoting ROBERT D. SACK, SACK ON DEFAMATION § 5.5.2.7.1 (3d ed. 2004)). For this reason, “[d]espite its typical literal ‘falsity,’ any effort to

control it runs severe risks to free expression as dangerous as those addressed to more ‘serious forms of communication.’” *Id.* (recognizing that rhetorical hyperbole is protected speech under the First Amendment); *see Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 20 (1990) (reasoning that “‘imaginative expression’ [and] ‘rhetorical hyperbole[.]’ which has traditionally added much to the discourse of our Nation,” cannot reasonably be interpreted as stating actual facts about an individual).

Indeed, “[c]ommon sense tells us there must be” a recognized exception from the laws of libel when words otherwise defamatory are uttered in a humorous context. *Isaacks*, 146 S.W.3d at 151 (citations omitted); *see also Letter Carriers v. Austin*, 418 U.S. 264, 283-84 (1974) (nonliteral, hyperbolic use of terms “scab” and “traitor” are not actionable defamation); *Hustler Magazine v. Falwell*, 485 U.S. 46, 53-57 (1988) (no liability where parody could not reasonably be understood as describing actual facts about the plaintiff); *Busch v. Viacom Int’l, Inc.*, 477 F. Supp. 2d 764, 775 (N.D. Tex. 2007) (court determined as a matter of law that no reasonable viewer would have believed the challenged clip contained assertions of fact about the plaintiff when plaintiff’s image appeared in a fake endorsement on a satiric program).

The Texas Supreme Court has “long held that an allegedly defamatory publication should be construed as a whole in light of the surrounding circumstances based upon how a person of ordinary intelligence would perceive it.” *Isaacks*, 146 S.W.3d at 154 (quoting *Turner v. KTRK Television, Inc.*, 38 S.W.3d 103, 114 (Tex. 2000)). “Falsity for constitutional purposes depends upon the meaning a reasonable person would attribute to a publication, and not to a technical analysis of each statement.” *Id.* at 154-55 (citing *Turner*, 38 S.W.3d at 116). “[T]he test is whether the publication could be reasonably understood as describing actual facts.” *Id.* at 157.

The person of “ordinary intelligence” is “a prototype of a person who exercises care and prudence, but not omniscience, when evaluating allegedly defamatory communications.” *Id.* (citing *Turner*, 38 S.W.3d at 114). The test is objective, not subjective. *Id.* Of particular importance here, this hypothetical reasonable reader “can tell the difference between satire and sincerity.” *Isaacks*, 146 S.W.3d at 157 (quoting *Patrick v. Superior Court*, 22 Cal. App. 4th 814, 821 (Cal. Ct. App. 1994)). “Thus, the question is not whether some actual readers were mislead [sic], as they inevitably will be, but whether the hypothetical reasonable reader could be.” *Id.* (citations omitted). “In a case of parody or satire, courts must analyze the words at issue with detachment and dispassion, considering them in context and as a whole, as the reasonable reader would consider them.” *Id.* at 158. Further, “a reasonable person reads communications in their entirety and is aware of relevant contemporary events, and they are “equipped with the national, historical, and temporal context” of the statement. *Lilith Fund for Reprod. Equity v. Dickson*, 662 S.W.3d 355, 363, 368 (Tex. 2023).

Here, Mr. Seraphin’s statements clearly constituted imaginative expression, satire, humor, and rhetorical hyperbole. Ms. Wilkins’ own Complaint admits this, calling the statements “ridiculous” and “ludicrous.” (See Dkt. 1, ¶¶ 14, 23). The statements intended to convey that there may be an ulterior motive for Ms. Wilkins’ relationship with Director Patel through purposefully over-the-top representations that a reasonable listener would not believe were assertions of fact. This reading of the statements is bolstered by the fact that, in interviews, Ms. Wilkins has joked about the “honeypot” and “Mossad agent” references made by other commentators. She herself finds them “truly hilarious”—but she sued Mr. Seraphin for repeating them in his humorous, tongue-in-cheek style.

Given the context of the statement—a political podcast—and the subject of the statement—a politically involved public figure in a relationship with a high-profile administration official—a reasonable listener would understand that Mr. Seraphin’s comments were merely a brief attempt at humor, satire, and rhetorical hyperbole in an effort to make news of the day interesting to listeners. *See Isaacks*, 146 S.W. 3d at 151 (recognizing that “[s]atire is particularly relevant to political debate because it tears down facades, deflates stuffed shirts, and unmask[s] hypocrisy,” and “[b]y cutting through the constraints imposed by pomp and ceremony, it is a form of irreverence as welcome as fresh air.”); *McDougal v. Fox News Network, LLC*, 489 F. Supp. 3d 174, 182-183 (S.D.N.Y. 2020) (recognizing that even outright accusations of crimes may constitute “rhetorical hyperbole,” that they are unlikely to be defamatory when “made in connection with debates on a matter of public or political importance,” and that “[t]his is especially true in the context of commentary talk shows[.]”); *see also* Dkt. 1, ¶ 1 (referring to Mr. Seraphin as “a podcaster and political commentator—profiting on controversy and outrage[.]”).

2. Ms. Wilkins Failed to Allege Actual Malice.

a. Ms. Wilkins Is a General or Limited-Purpose Public Figure.

A public figure suing for libel “must shoulder the heavy burden of showing that the defendants acted with ‘actual malice’”—a burden exclusive to those in this status. *Brueggemeyer v. American Broadcasting Cos.*, 684 F. Supp. 452, 454 (N.D. Tex. 1988) (citing *New York Times Co. v. Sullivan*, 376 U.S. 254, 279-80 (1964)). Actual malice is defined as knowledge that the publication was false or to act with reckless disregard of whether it was false or not. *Id.*

Questions concerning a defamation plaintiff’s status are matters of law for the Court to decide. *Trotter v. Jack Anderson Enters.*, 818 F.2d 431, 433 (5th Cir. 1987). “Public figures fall into two categories: (1) all-purpose, or general-purpose public figures, and (2) limited-purpose

public figures.” *McLemore*, 978 S.W.2d at 571. “General-purpose public figures are those individuals who have achieved such pervasive fame or notoriety that they become public figures for all purposes and in all contexts.” *Id.* (citing *Gertz v. Robert Welch*, 418 U.S. 323, 351 (1974)). “Limited-purpose public figures, on the other hand, are only public figures for a limited range of issues surrounding a particular public controversy.” *Id.* (citing *Gertz*, 418 U.S. at 351). The Fifth Circuit has adopted a three-part test to determine whether an individual is a limited-purpose public figure: (1) the controversy at issue must be public both in the sense that people are discussing it and people other than the immediate participants in the controversy are likely to feel the impact of its resolution; (2) the plaintiff must have more than a trivial or tangential role in the controversy; and (3) the alleged defamation must be germane to the plaintiff’s participation in the controversy. *Id.* (citing *Trotter*, 818 F.2d at 433).

Under these standards, Ms. Wilkins is a high-profile country singer, published writer, and political commentator who lives her life “very publicly,” and even describes herself as a “public figure.” (See Dkt. 1, ¶ 7; Exhibit I, at pp. 3-4, 06:59-07:09; Exhibit J, at p. 3, 6:06-06:15). Further, it is “widely known” that she is dating Director Patel, and by her own admission, “[i]t is public knowledge that [she] and Dir. Patel are in a long-term relationship[.]” (Dkt., ¶¶ 7, 11). These facts establish Ms. Wilkins’ status as a public figure. See *Brewer v. Memphis Pub. Co.*, 626 F.2d 1238, 1255 (5th Cir. 1980) (finding that the plaintiff was a public figure not only because she was a singer in her own right, but also because she was in a relationship with Elvis Presley); *Corsi v. Infowars LLC*, No. A-20-CV-298-LY, 2021 U.S. Dist. LEXIS 98486, at *3, 20 (W.D. Tex. May 24, 2021) (author and political commentator is a public figure).

Alternatively, Ms. Wilkins’ relationship with Director Patel establishes that she is a limited-purpose public figure. Applying the Fifth Circuit’s standards as to limited-purpose public

figures, the “controversy”—her relationship with Director Patel—is public, and she, of course, has more than a trivial or tangential role in that relationship as evident by her interviews on talk shows. Accordingly, Ms. Wilkins is required to establish that Mr. Seraphin made his statements with actual malice.

b. Ms. Wilkins Has Failed to Allege Facts Demonstrating That Mr. Seraphin Made His Statements With Knowledge of Their Alleged Falsity or With Reckless Disregard for Their Truth.

Ms. Wilkins has not alleged facts sufficient to show actual malice. In an effort to allege that Mr. Seraphin knew his statements were false, Ms. Wilkins notes that she met Mr. Seraphin one time. (*See* Dkt. 1, ¶ 14). While Mr. Seraphin disputes ever meeting Ms. Wilkins, even taking her allegation as true, such a “meeting” even if it occurred does not establish Mr. Seraphin’s purported awareness that she is not a “honeypot” or “former Mossad agent.”

Ms. Wilkins proceeds to allege, in conclusory fashion and without imputing this knowledge to Mr. Seraphin, that she is not Jewish, that she has never been an agent for any intelligence agency, and that Mr. Seraphin “knows” his suggestions were “vile and ridiculous.” (Dkt. 1, ¶ 14). These, and her other conclusory allegations that Mr. Seraphin “maliciously lied,” “falsely assert[ed],” and spread “malicious and knowing lies,” are insufficient to state a claim. (Dkt. 1, ¶ 1). *See Twombly*, 550 U.S. at 555 (observing that to survive a motion to dismiss, plaintiff must allege “more than labels and conclusions, and a formulaic recitation of the elements of a cause of action will not do.”). Thus, she fails to establish that Mr. Seraphin knew his statements were allegedly false or made the statements with a reckless disregard for the truth.

As Ms. Wilkins’ own pleadings acknowledge, and the Statement of Facts demonstrates, political commentators were questioning her affiliation with Israel even before Mr. Seraphin’s statements. (Dkt. 1, ¶ 23). Yet Ms. Wilkins did not sue the other commentators who made these statements—nor does she allege that Mr. Seraphin was in possession of specific information

establishing the falsity of these matters. Instead, she admitted that the public information available about her might lead commentators to draw the “wrong” conclusions, stating she understood how commentators “want to connect things” and “they have taken just these pieces of evidence . . . and tied them together in all of the wrong ways.” (*See* Exhibit I, at p. 1, 01:52-02:11). If anything, Ms. Wilkins’ acknowledgment *before Mr. Seraphin’s remarks* that the comments made by others were “funny” and “truly hilarious”—and her joking that she “should have taught classes [on how to be a spy], honestly”—support Mr. Seraphin’s position that he did not act with actual malice. (*See* Exhibit K, p. 2, 27:15-27:29). All of this prevents Ms. Wilkins from establishing that Mr. Seraphin knew of the alleged falsity of these allegations or made his statements with reckless disregard for the truth.

Ms. Wilkins’ allegation that Mr. Seraphin has not reached out to her fares no better, because Mr. Seraphin was under no obligation to contact her, and she does not assert that she ever informed Mr. Seraphin that she was not a “honeypot” or “former Mossad agent.” (*See* Dkt. 1, ¶ 23).

IV. CONCLUSION

Ms. Wilkins filed this lawsuit to silence a critic of her and Director Patel. Mr. Seraphin’s statements were non-actionable imaginative expressions, satire, and rhetorical hyperbole. Because her Complaint contains only conclusory allegations, the Court should dismiss it and reject her attempt to use the judicial system as a tool to silence the opinions of someone with whom she disagrees. Mr. Seraphin respectfully requests the opportunity to present oral argument in support of this motion.

Respectfully Submitted:

/s/ Daniel J. Hall

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served in accordance with the FEDERAL RULES OF CIVIL PROCEDURE upon all parties on this the 4th day of November, 2025.

/s/ Daniel J. Hall

Daniel J. Hall

EXHIBIT A

[Home](#) / [News](#) / [Press Releases](#)

Whistleblower: FBI Putting 'Threat Tags' on Parents Protesting School Boards

November 17, 2021 [Press Release](#)
[Spencer Brown](#) |[@itsspencerbrown](#)| Posted: Nov 16, 2021 4:45

PMA government insider is blowing the whistle on what the FBI is doing to comply with an October 4th directive — covered by Townhall [here](#) — from the Biden administration requiring federal agents to come up with a plan to monitor harassment of or threats against school board members, administrators, teachers, and support staff.



A letter from House Judiciary Committee Ranking Member Rep. Jim Jordan (R-OH) calling out Biden's Attorney General Merrick Garland outlines the documents turned over by the whistleblower and demands answers from the DOJ about a new "threat tag" being used to track parents. "The email... referenced your October 4 directive to the FBI to address school board threats and notified FBI personnel about a new "threat tag" created by the Counterterrorism and Criminal Divisions," writes Jordan. "The email directed FBI personnel to apply this new threat tag to all 'investigations and assessments of threats specifically directed against school board administrations, board members, teachers, and staff.'" As Jordan's letter continues, "The email articulated the purpose as 'scop[ing] this threat on a national level and provid[ing] an opportunity for comprehensive analysis of the threat picture for effective engagement with law enforcement partners at all levels.'" Rep. Jordan concludes that the whistleblower's "disclosure provides specific evidence that federal law enforcement operationalized counterterrorism tools at the behest of a left-wing special interest group against concerned parents," referencing the National School Boards Association's [coordination](#) with the Biden administration to secure the DOJ's action against parents.



The email, also tweeted out by Republicans on the House Judiciary Committee, is pretty clear in its purpose, as Rep. Jordan highlighted in his letter to Attorney General Garland. A new threat tag — "EDUOFFICIALS" — should be used to track investigations and assessments. One of the requests accompanying the guidance on the threat tag is that "when evaluating potential threats" agents are to "attempt to identify the following: a) Is there a federal nexus? b) Are there potential federal violations that can be investigated and charged? c) What's the motivation behind the criminal activity?" So parents who show up at their local school board meeting, write a letter to administrators, or send an email to their child's teacher could now end up tagged as a threat in the FBI's database if their words or actions are deemed to be threatening, harassing, or intimidating — apparently even if there aren't any federal violations that can be investigated or charged. For their part, the FBI claimed in a statement provided to The Wall Street Journal on Tuesday that applying a threat tag to an individual or an incident doesn't necessarily mean an investigation will be opened into the person or situation.



The FBI also claimed that it's "never been in the business of investigating parents who speak out," but the Biden administration's directive seems to contradict that as a parent who speaks out in a way that some bureaucrat says is threatening, harassing, or intimidating, could in fact find themselves receiving a threat tag.



Rep. Jim Jordan (R-OH) also pointed [out](#) that Attorney General Merrick Garland claimed in testimony that the FBI wouldn't target parents as a result of his directive to look into the conflicts happening between school officials and parents. If getting slapped with a "threat tag" by the FBI doesn't mean parents are being targeted, Garland definitely needs to explain how that works. Nicole Neily of grassroots nonprofit Parents Defending Education said the whistleblower's disclosures "prove that the FBI was, in fact, using counterterrorism tools to investigate concerned parents who have attended school board meetings – which directly contradicts Attorney General Merrick Garland’s sworn congressional testimony." "The

Whistleblower: FBI Putting Threat Tags on Parents Protesting School Boards, House Judiciary Committee Republicans

American people deserve a full accounting of exactly who was involved, and when – so that egregious overreach like this may be prevented in the future," Neily added.



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EXHIBIT B

Exhibit B

Transcript of The Kyle Seraphin Show, DESPERATE FBI Director Digs Deep into...John Bolton's Mustache? | Ep 637

Kyle Seraphin, *DESPERATE FBI Director Digs Deep into...John Bolton's Mustache? | Ep 637*, The Kyle Seraphin Show (Aug. 22, 2025), <https://open.spotify.com/episode/2bXjDPd8geMIKS8nyLhE9F?si=db7d3f08388d42ad&nd=1&dlsi=3a10bef3c08c455c>

Introduction 00:11

Take a look behind the curtain with a real whistleblower, an American patriot. Prepare to embrace the uncomfortable truth, because this program has no time for comforting lives. Here is civil liberties enthusiast, Second Amendment defender and recovering FBI agent, Kyle Seraphin.

.....

Speaker 1 – Kyle Seraphin 11:17

No one is above the law. FBI agents on mission said Kash Patel on X, because that's how people find out what's going on in the FBI, that work in the FBI, if there's no tweeting, then how do you know what the leading thinks? The probe, which is said to involve classified documents, was first launched years ago, but the Biden administration decided that it was too political and that it basically didn't have the substance to carry on. That's what the New York Post reported this morning. He hasn't been arrested. He hasn't been charged. It comes after years of investigation which has something to do with the potential criminality of national security information that was put out in his book.

Speaker 2 – Steve Friend 12:58

And I suppose that there's not a statute of limitations issue, because if he's still in possession of that information, that's not going to be the issue,

Speaker 1 – Kyle Seraphin 12:08

Right, assuming he is. This says it was related to an investigation that began in 2020, that's the end of Trump's first term, the same year that Donald Trump's Justice Department launched a criminal inquiry into his alleged disclosure of national security secrets in his book, "The Room Where It Happened." That investigation came after Trump and Co. tried to quash the publication after its inclusion of what they considered to be national security secrets. They claimed that he broke the NDA, which was signed as a condition of his employment, something you and I are both familiar with. We both signed those and we've signed the read in and the read out of it, and Biden's administration thought it was too political. Now, yeah, he is. He's obviously like a Trump antagonist. You could see why Biden might be excited about having that continue on, you know, give him cover. But is this really, is this really the bad guy that they're

hoping for? Are we gonna just see the q-tard people that like, are they just gonna be like, you know, “yes, this is, this is, as the prophecy has stated. The internet God has now delivered us this Bolton mustache,” or are we now grasping deeply because anything—forget the friendly Friday thing—are we at like, anything to be able to just not talk about the fact that Kash Patel is probably about to get replaced?

Speaker 2 – Steve Friend 13:15

Well, the Co-Deputy Director was talking recently about how he was shocked to his core to uncover—

Speaker 1 – Kyle Seraphin 13:21

Which one is the CO-Deputy—hold on—which one is the Co-Deputy Director?

Speaker 2 – Steve Friend 13:24

Well, it's the one that is currently in position there. And sort of, I'm struck by the org chart which I have reviewed, unlike current leadership over at the FBI. So we have one Director, two Deputy Directors, and then one Associate Deputy Director, so that the tree goes back down to narrow again. It's, you didn't do a good job of doing the hedge cutting of that one.

Speaker 1 – Kyle Seraphin 13:47

All right, is it, is it fair that you share the same analysis that I do, that there's no chance you bring in somebody to help you with your job because you're doing a great job?

Speaker 2 – Steve Friend 13:57

No, I think that that's spot on—and particularly because of the individual that was brought in, him being in those discussions to take the top helm there. That to me speaks very loudly. And the other things that you're hearing about in the rumor intelligence around the current Co-Deputy Director, that he's physically packing up his office, I mean that, that, to me, says more than we need to know about where his future endeavors are going to be, which is probably back where he should be, where he's got an audience that's waiting for him, and he's done very well professionally, and he did share information went all the way on that limb years ago about the Russia hoax, and that propelled him in the stratosphere. That's your jam. That's your lane. You can go back to that and be successful. This just wasn't it. And you were set up to fail from the beginning because you came in as an outsider, and you weren't given the tools, you weren't given the people surrounding you that would empower you to make the necessary decisions to bring about the changes that you would hope a Director would identify that needed to be made, just kind of we're riding those out, and I think that the change is probably necessary if they have the opportunity to do it, maybe we get the second bite of the apple here to actually fix this agency.

Speaker 1 – Kyle Seraphin 15:03

I watched John Rich go out and, and try to run cover again. All the, all the signs tell me exactly what I think is going to happen. And of course, everybody says, if you call it too early, then you're the problem. But it's pretty clear. John Rich, who's friends with Dan Bongino, is out talking about how Dan Bongino,

you know, he wasn't there for tea and crumpets. He was there giving up his, his easy life for difficulty. It sounds like he was actually begrudging the thing. I found out something yesterday when I was interviewing Kurt Suzak on Infowars. And I had not thought of this before, but whether you like Andy McCabe or not, and I don't like him, and I don't think you do either, whether you like Paul Abate, who's the previous Deputy Director. Yes, none of you know who the previous Deputy Directors of the FBI were, because you didn't care or work in the FBI, which is how you know a top tier politician who's on his way up doesn't go into a number two job that no one's ever heard of again. None of you know what David Bowditch is up to today, even though he works for Disney. And you may know only because I've talked about it. And those are just the dep—I can't remember the Deputies before me, before I was in the bureau. I have no idea. I really don't. And two of those, two of those Deputy Directors, of the three I just named, were acting FBI Directors for a period of time. So take that for whatever it's worth. They were actually at the top. What Kurt Suzak pointed out to me is that the Deputy Director job of the FBI is like a 15 to 18 hour a day job. It's absolutely effing miserable. And I, you know, I don't blame Bongino for not liking it. If you took me from the job I do now and the way that I do it, and the flexibility and the freedom I have to do what I do, and put me in that gig, I'd be a, I'd be a basket case, because that's a massive transition. But more importantly, he's not set up to be successful in that job. You need someone that knows that agency. Imagine if you don't know the background of the thing you're trying to do. So not only are you learning on the job, like, what's the culture? What are the names? What is the org chart? Like, who are these people? What's their history? We're gonna get into something here again. Yesterday, I put the name out there of Jill Enyart, and I want to cover it again. But it's like, you have so much to learn, and you're not used to working that way, in that format. Yeah, it's, and for very little money compared to what he was doing before. Of course, he's miserable. I don't blame him.

Speaker 2 – Steve Friend 17:05

And we're getting into, because these jobs sort of self-selects for the type of person that it's going to enjoy, perhaps, yeah, he's thriving. It's a person who leans in and really likes having meetings all day long. Because if they didn't like it, they would have left headquarters a really long time ago, and those guys were nothing if not headquarter animals that were bouncing back and forth, back and forth, just so they could get back there and make sure that they had all those meetings and reviewing all those PowerPoints all day long, like that's something that they enjoy, which, I mean, I don't. I wouldn't want that job. I wouldn't wish that job on just about anybody, unless it's a terrible person. But then again, I'd be empowering them. So it's a double-edged sword.

Speaker 1 – Kyle Seraphin 17:41

We can, we can push this exactly to people's personal experiences. A lot of you have seen this in companies you've worked for, if you've worked in the law enforcement realm, or if you've worked in the military, you know exactly what I'm talking about. You're often not led by the best person at the job. You're led by the person who stuck around longest to do things that nobody else wanted to do. And there's a value in that because that person is most committed, but these are the most also like institution over constitution types people, because they are dead set on getting that next promotion. They're dead set on

doing what it takes to do that job. Again, that's the Deputy's role. The funniest thing that you mentioned, I just want to put this one more thing in the org chart, doubling up on that position right now, historically speaking, and you and I may have both seen the same org chart, but it used to go FBI director, Deputy Director. The Deputy would run the operational side of the FBI, so all your criminal cases, your national security cases, the one that actually have agents, and then the Associate Deputy Director, which they still have that position, would run the other pieces of it, which are like the administrative ends, the lab division, the you know, the intake phone calls, the you know, whatever sort of science and technology branch, like all this other kind of stuff that's sort of like support. So they actually used to have sort of a Co-Deputy Director. The Co-Deputy Director's job is called the Assistant or the Associate Deputy Director. They actually still have it. That's the funniest thing to me about all this.

.....

Speaker 1 – Kyle Seraphin 57:45

All right, all right, right. And then right afterwards, I went out there and showed them that there's this woman named Jill Enyart who's still working for the FBI. She was involved in this thing. What I didn't realize. Do you remember this headline from Kerry Pickett five months ago?

Speaker 2 – Steve Friend 57:53

I do. I do, because I've been talking about that since the last five months.

Speaker 1 – Kyle Seraphin 57:58

Okay, Kash Patel disputes whistleblower revelations about FBI honeypot agents spying on the Trump campaign. All right, so for folks to understand, yesterday, I queried the person who brought forward that whistleblower disclosure, which was Kurt Suzak. I queried him on Infowars, if you guys are listening and you want to find it over on, you can find it on Infowars. You can find it at Real Alex Jones and all that kind of stuff. But you can also find it on locals later on today, I'll put it up. It'll be at kyleseraphin.com. You can watch the interview I did with Kurt. What I thought was being disputed. I thought Patel was saying that there was, in fact, no honeypot operation.

Speaker 2 – Steve Friend 58:32

No, oh, he's doing the same thing he did in that interview.

Speaker 1 – Kyle Seraphin 58:37

Right? They play with these words. And this is why I think these guys are cooked, and this is why I think you've got something going on with this Bolton thing, where it's all about misdirection. If you were really serious about going after the bad actors, you wouldn't be looking externally. You wouldn't be going after the Russia gate villains that are gone, that have like passed the statute of limitations, and you certainly wouldn't be dealing with the people who like, had the official capacity. There was a release yesterday

saying, like, oh, the FBI author, you know, the FBI Director leaked classified material. The FBI Director also has the ability to declassify material, so you have no idea whether or not he, if he authorized it, then he did, period. And I don't think you can go after him for an official act. What Kash Patel had a problem with, and these are people who still work in the FBI, is he didn't like the characterization as the word honeypot, because honeypot is a colloquial term, so there's no real definition of what it means. But the idea that you'd have a pretty woman infiltrate as an undercover, that's what we generally would call a honey pot, kind of like what his girlfriend does.

Speaker 2 – Steve Friend 59:35

This is a language game. And we've talked about it before, but like, look, the interview that he just did. He was asked, "Did you remove those people?" But the implication being, did you fire them? And he said that they were removed from leadership, which I don't hate. That's something that Kurt Suzak has recommended.

Speaker 1 – Kyle Seraphin 59:49

Right, that's actually not true by the way.

Speaker 2 – Steve Friend 59:51

Smart move, but he's given that answer. It's very lawyerly. They gave the same lawyerly answer when they were asked, "Were there undercovers at January 6?" And the FBI responded, there were no undercover employees at January 6 because UCE—undercover employees—a very specific designation. But most people, when you say were there undercovers, are presuming, did you have plain clothes agents present there in the crowd? And it would be dumb not to at a major gathering, but they give a very specific response to the Inspector General. He's giving a very specific response here. Honeypot is something that he took umbrage with, that characterization of it, but they just didn't ask, did you send a quasi hot chick to infiltrate the Trump campaign so that they, she could dig up dirt, which is what the whistleblower allegation was and is accurate about?

Speaker 1 – Kyle Seraphin 1:00:40

Right. Again, they scrubbed this from the, from the website, folks, this is gone from the Washington Times. New whistleblower identify agents assigned to infiltrate Trump campaign. And then you've got this one here where he disputes. And I didn't realize it until Kurt pointed out it was a terminology thing. It wasn't a fact that it didn't happen. This woman, Jill Enyart, who is not removed from leadership from what I can tell. She's friends with the Special Agent in charge of the New York Field Office. And all of this actually goes to a truly scandalous thing. I'm going to read this real quickly. Mr. Patel took to social media to dispute that the female agent was not a honeypot. A honeypot is an undercover operative who feigns sexual or romantic interests to obtain information from a target. It's not necessarily that, it's that, that the possibility exists because the person actually presents like an attraction. You don't have to actually feign anything. And the FBI has no problem using these, by the way, if you follow Trevor Aaronson and the, the Alphabet Boys, thing that happened in Denver, they sent a woman who had huge boobs, like

cartoonishly huge boobs as a detective, she was brought into the JTTF, and she was sent into a BLM protest. And then her backstory, or her legend, as they call it, was that she was a recovering hooker.

Speaker 2 – Steve Friend 1:01:49

Yeah, she was a sex worker [overlapping discussion]. And they called these young, 19 year old dudes in a room like, “Hey, want to buy illegal guns?” But they're not thinking with the head that is at the top at that point, it's the one that's three feet underneath.

Speaker 1 – Kyle Seraphin 1:01:59

Right. But she totally wasn't a honeypot like she's an undercover operative, like doing totally legit things. The fact is, this woman was apparently at a fairly high level in the CI program. She was either an Assistant Section Chief or a Section Chief, which is a truly problematic thing. And Kash Patel takes umbrage with the word honeypot, not anything else. He's had his own little honey pot issue that's been going on of late. So we're just going to acknowledge it real publicly. He's got a girlfriend that's half his age, who apparently is both a country music singer, a political commentator on Rumble, a friend now of John Rich through Bongino, who also owns a big chunk of Rumble, and she's also a former Mossad agent in what is like the equivalent of their their NSA, but I'm sure that's totally because, like, she's really looking for, like a cross eyed, you know, kind of thickish, built, super cool bro who's almost 50 years old, who's Indian in America. Like it has nothing to do with the fact that we're really close to the Trump administration. Anyway, I'm sure that that's totally just like love. That's what real love looks like. That's why Kash Patel is in his 40s and lives with a man in in Las Vegas, full time, totally regular. No big deal. I'm just saying it's interesting that he decided to go and take umbrage with this. And I'm gonna tell you why I think it's so wild, Steve, because it actually goes to the thing that that was stated earlier, and it ties into the Epstein situation. The New York Field Office and the New York Mafia, which I will have you explain in your terms in a second, because I'm sure you've experienced it differently. The New York Mafia in the FBI got Kash Patel's ear almost immediately, supplanted our recommendation for a good Deputy Director, to his detriment, I think, and then started whispering sweet nothings like that chick is not a honeypot. You need to do these things and manage to basically discredit him by punching out a bunch of fake information that made Bondi look terrible. And I think actually is going to bring down the Deputy Director time of Dan Bongino. I think that the Epstein rollout discredited him basically in a way that he's no longer able to recover. That's my take on it, and it's all from the same crew of people that we heard are all gone yesterday from Patel on Fox News. What do you think about the New York Mafia? Do you want to break it down for people so we have this real clear idea of who is actually running—I've been always, kind of people always like, well, who's really running the FBI? Maybe I think it's the, now I'm starting to lean towards this. So go ahead, if you would.

Speaker 2 – Steve Friend 1:04:19

There's different faction, I guess you could characterize them in, within the FBI. And you always kind of hear the rumbling. The New York Mafia is one. I've heard the Mormon Mafia being another one.

Speaker 1 – Kyle Seraphin 1:04:29.

Oh yeah.

Speaker 2 – Steve Friend 1:04:29

The HRT mafia. And it's basically people who are on a certain career track. They have the same sort of, they're swimming in the same pool with the same characters as they're all progressing in their careers. They all kind of take care of each other. They pull themselves along the lines as you're gaining in your career and you're trying to progress and climb the next ladder. It behooves you to have what's called a rabbi, right? Somebody who is at the next level up that pulls you along. You kind of are able to provide the ability for them to brag about what you're doing, and they're able to, like, watch out for you and mentor you, for lack of a better term, to bring you along in your career. One step, next step, next step. And these different factions are represented within the FBI, and they're kind of vying for control, because the New York people are not really playing with the HRT people who might not be playing with the Mormon people. They're all vying to get to those very top spots, and there's a limited number of seats at that table when you get to the very tippy top of the pyramid of the structure. So they are rivals.

Speaker 1 – Kyle Seraphin 1:05:24

Isn't it funny that people have, have previous, to quote, unquote, our team getting involved, they referred to the FBI and the way that it's structured and the way that it actually operates internally and externally, like organized crime?

Speaker 2 – Steve Friend 1:05:36

That, or religious organizations. The College of Cardinals around James Comey, the rabbis, the Mormon mafia.

Speaker 1 – Kyle Seraphin 1:05:42

It's really strange, because all of these things are perfect analogies, so they overlay almost perfectly on there. But it also involves a faith in a thing called the FBI. Yesterday we got told by, well, I guess it was a couple weeks ago, Jimmy Gags, who's a retired, like, sort of like sainted FBI guy. He was at various different news organizations, and he was talking on these different cable outlets, including Fox, and he's a former HRT guy. And he's thought of well, and he's, has gone reasonable, but he's also not reasonable of late, when I see it. And he was like, I would much rather have the respect of my former colleagues than anything else. And it's like, no, your former colleagues are dirtbags, man. A lot of these people are pieces of shit, and they have done really, really awful things. Like, they, somebody agreed to go out there and go after John Bolton after it was already deemed too political, like, maybe it's a lawful order and maybe you got a search warrant, but so was the one at Mar a Lago, which now Kash Patel has claimed there was no, there was no predicate for it, like, dude, one way or another. It was a lawful search. It was a terrible decision. It was a completely destructive thing to our country to go out and execute it. But like no one is saying you didn't have the vestiges of legitimacy, because a court did sign off on it, even if that court guy

is, you know, Bruce Reinhardt, and he's compromised, he still signed it. And so under our system, it's still a legal warrant, just like going after Bolton, just terrible.

.....

Speaker 1 – Kyle Seraphin 1:10:39

I'm gonna tell people in no uncertain terms. I'll put it back up on the screen. Kash Patel, I believe, this is, okay. Full speculation time. Welcome to the program. If you guys are new here, this is where I just tell you what I think is going on, and the only facts that I have are what we've been observing and what's been going out there for the last little bit. I think that it's pretty clear that Andrew Bailey will become the FBI Director inside of maybe the next six months, maybe the next eight months, something like that. At some reasonable amount of time, they will remove Kash Patel. I think it's very clear to me that Dan Bongino is already done. That's why John Rich is out there defending him and trying to make sure that his audience stays intact. That's why people have been out there the whole time for the last few months, trying to defend him after the Epstein debacle, I think he's freaking miserable. I think that—"I gave up everything for this." Okay? He gave up everything for it. He's been making a martyr of himself. What I found that people who are in the hero business just go do hero stuff. People who are in the complaining about how life, tough their life is, are in the image business. And Dan Bongino is in the image business right now. He's trying to regain it. So whatever that's all going on. I think Dan's gone. I think Kash is gone soon enough. I called that out a couple of days ago, and I think Kash shit the bed. I think he freaked the hell out and realized that his tenure and his smiling celebration of Andrew Bailey becoming the Co-Deputy Director was actually him smiling and like congratulating his own replacement, whether he realized it or not. And I think he's got enough hubris, and he's got enough cool jets and, like, cool guy clothes, that he doesn't even realize that he was getting booted out. And he actually, like, hand shook his own replacement. That's Kyle's take. After that, you guys got some acknowledgement from DOJ, saying that there was going to be a deal offered. And the deal is what we refer to as the Marcus Deal, which is that Marcus Allen, you get your back pay, you get a security clearance, but piss off and you can't work here anymore. And that's actually not necessarily disagreeable. I personally don't want you guys to go back to the FBI, because I hate the FBI. Then I think Patel saw Infowars, heard about what Kyle Seraphim is saying about it, realized the unbelievably clear logic that top tier talent out of Missouri is not coming in to become the number two when Kash Patel's own PR people were calling us before he was nominated and saying, you know, Andrew Bailey is the stiffest competition to Kash Patel being FBI director, you got those calls right?

EXHIBIT C

Tuesday, November 4, 2025

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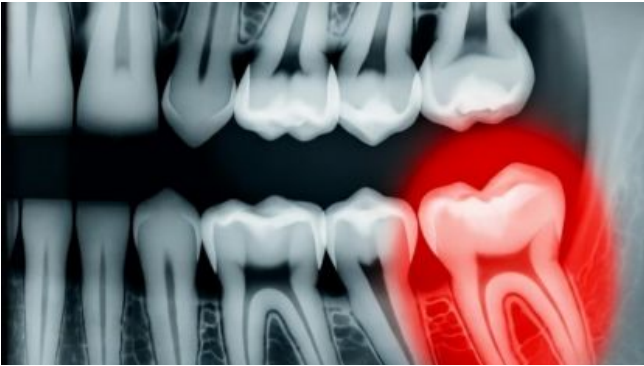


The FBI Doubles Down on Christians and White Supremacy in 2023

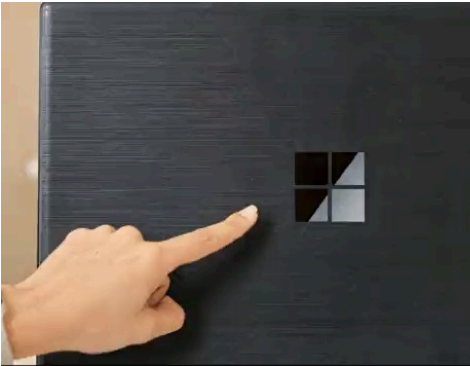
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The FBI Doubles Down on Christians and White Supremacy in 2023



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The FBI's Richmond Division would like to protect Virginians from the threat of "white supremacy," which it believes has found a home within Catholics who prefer the Latin Mass. An intelligence analyst within the Richmond Field Office of the FBI released in a new finished intelligence product dated January 23, 2023, on Racially or Ethnically Motivated Violent Extremists (RMVE) and their interests in "Radical-Traditionalist Catholics" or RTCs. The document assesses with "high confidence" the FBI can mitigate the threat of Radical-Traditionalist Catholics by recruiting sources within the Catholic Church.

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The acronym, new to many in the Domestic Counterterrorism field, comes with a footnote by the writer explaining RTCs are "typically characterized by the rejection of the Second Vatican Council." The writer makes an unsubstantiated leap that a preference for the Catholic Mass in Latin instead of the vernacular and a number of more traditional views on other world religions can amount to an "adherence to anti-Semitic, anti-immigrant, anti-LGBTQ and white supremacist ideology." This writer draws the important distinction between "traditional Catholics," who simply prefer the Traditional Latin Mass and pre-Vatican II teachings, and RTCs, who espouse "more extremist ideological beliefs and violent rhetoric."

A discerning reader may wonder why the writer believes such divisions exist and if there is evidence of the extremist and violent rhetoric within the Catholic church. The analyst's note doesn't provide specifics. When the FBI generates an intelligence product, it is important to note the analyzed sources. Typically, strict source vetting removes partisanship and bias, so a product is both consistent with federal law and can add value to the FBI's overall mission. Of note, this document was reviewed and approved for release by the FBI Richmond Chief Division Counsel, who is the office's top lawyer.

The attached appendices refer to a number of articles and the out-of-FBI-policy Southern Poverty Law Center (SPLC) at the end of the document. For example, Appendix D is a direct copy of the SPLC list of "Radical Traditional Catholicism Hate Groups," including the web address accessed. The SPLC appears to be a source for the intelligence analyst's beliefs that RTCs exist and that they are anti-Semitic. The SPLC description for this "hate group" states RTCs "may make up the largest single group of serious anti-semites in America." Often in the intelligence world, this type of statement without any established evidence is often followed by the acronym "NFI" or "No Further Information" to indicate it is an unsubstantiated opinion. Additionally, SPLC states RTCs "embrace extremely conservative social ideals with respect to women." Nothing reported by the SPLC indicates the number of adherents to this alleged ideology nor any instances of violence. This lack of evidence and blatant partisan blindness is one of many reasons the FBI has distanced itself from the SPLC as a source in the past 10 years. The intelligence product includes endnote citations from two other sources: the far-Left online

Tuesday, November 4, 2025

Right Fringe, Catholics and Racists Forge a movement." These articles were released a day apart as a series but include substantially the same information. The articles offer only circumstantial suggestions of affiliations between inflammatory figures like Milo Yiannopoulos and Nick Fuentes and a man pictured standing on the steps of a Catholic church in New York after the Dobbs decision. The Salon writer makes the wild leap that using a photo of someone at a church indicates the pictured individual or his beliefs are relevant within a religious institution with 70 million adherents in the United States alone and over 2000 years of tradition and history.

The writer determines that the "threat picture" involving RMVE, again in this case, referring to white supremacists, will increase, but that the "RTC Community is likely to remain relatively stable or show modest growth" over the next one to two years. The basis for this assessment is not annotated and appears to be speculative. The speculative increase in RMVE interactions with RTC leads the writer to suggest mitigation strategies, including recruiting Confidential Human Sources ("source development"), tripwire, and liaison contacts. Tripwires and liaisons are overt contacts with trusted members of a community or an industry. They can advise law enforcement about potentially illegal activity. Due to the fact that "white supremacy" is itself a First Amendment-protected belief, to say nothing of proponents of the most established Christian denomination in the world, the Bureau tries to cover documents like these with a caveat excusing their intrusion into the sacrosanct grounds of free exercise of religion and free association. In another typical intrusion into First Amendment concerns, the document implies a strategy of monitoring social media for RTC ideology in online posts.

The impetus of the writer can be assessed by the fixation on abortion and the repeated use of the phrase "abortion rights." Documents like these can be used to drive the FBI's priorities in specific regions and boost the visibility of non-existent threats. There is a reason the writer refers to the document as a "first of its kind" Domain

Tuesday, November 4, 2025

Americans will remember a flood of conservative news outlets covering arrests of numerous pro-life protesters at the end of 2022, which are coming back into focus after the January 30, 2023 acquittal of defendant [Mark Houck](#). While over 100 instances of attacks on pro-life pregnancy centers occurred in 2022, the SPLC reported an unsubstantiated 200 "bombings or arson attacks" on abortion clinics in the past 20 years.

This tremendous statistical mismatch usually would have led federal law enforcement to focus on the highest threat, but the increasingly Leftist bend of FBI enforcement actions appears to have ignored this trend. It also appears the writer is simply assuming RMVEs share common cause with Conservatives, including practicing Catholics, on issues about abortion, immigration, affirmative action, and LGBTQ protections. This editorial bias should give the reader of this document a medium to high confidence the intelligence analyst is the product of left-leaning higher education and leftist values.

The piece concludes with the incredible leap that RMVEs or white supremacists pose a threat to use "RTC social media sites" (no examples) or "places of worship as facilitation platforms to promote violence." This intelligence product is indicative of a permissive tolerance within the FBI for Left-leaning ideological actors who use academic-sounding rhetoric to cover a dearth of personal experience. The weaponization of the FBI against conservative Americans can be seen in the way documents like this are published and distributed. Poorly sourced and highly speculative intelligence products lead to opening badly articulated predicate investigations into Americans in violation of their God-given, First Amendment-protected civil liberties.

While most Americans are familiar with criminal investigations, which explore the allegation or information that a crime has been committed, many are not familiar with intelligence investigations. In contrast to the linear nature of a criminal case, counterintelligence and counterterrorism cases follow a circular path that can continue indefinitely without any articulated goal. Indeed, information is the goal of these types of cases. Many counterterrorism cases never articulate or uncover a single criminal act. Yet, they continue in order to develop more understanding of the "threat landscape" or "threat pictures," as quoted in this document. Intelligence investigations often beget more investigations. The relevance of this product should not be lost on the reader.

Products like this can be used to support the opening of information-only cases, and there is no reason to expect Radical-Traditionalist Catholics are the end point of this train track – they will be the beginning. Opening the door to associating white supremacists with

Tuesday, November 4, 2025

Traditional Evangelicals. The FBI is forbidden from opening cases or publishing products based solely on First Amendment-protected activities. By tolerating the publishing of intelligence products as shoddy as this, they are crossing a line many Americans will find themselves on the wrong side of for the first time in history. This is what a politicalized FBI looks like; it should not be tolerated if Americans expect to enjoy the protections of our Bill of Rights.

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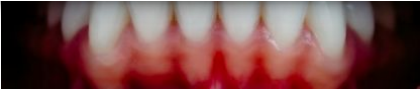
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28,852



Should Crowder be free to say what he believes?

Yes, I support free speech

No, platforms should set limits



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EXHIBIT D

EXHIBIT D

Sam Parker (@BasedSamParker), X.com (Feb. 24, 2025, 3:57 A.M.), <https://archive.ph/h7X2v>;
<https://x.com/BasedSamParker/status/1893872813930655996>



Sam Parker   
@BasedSamParker

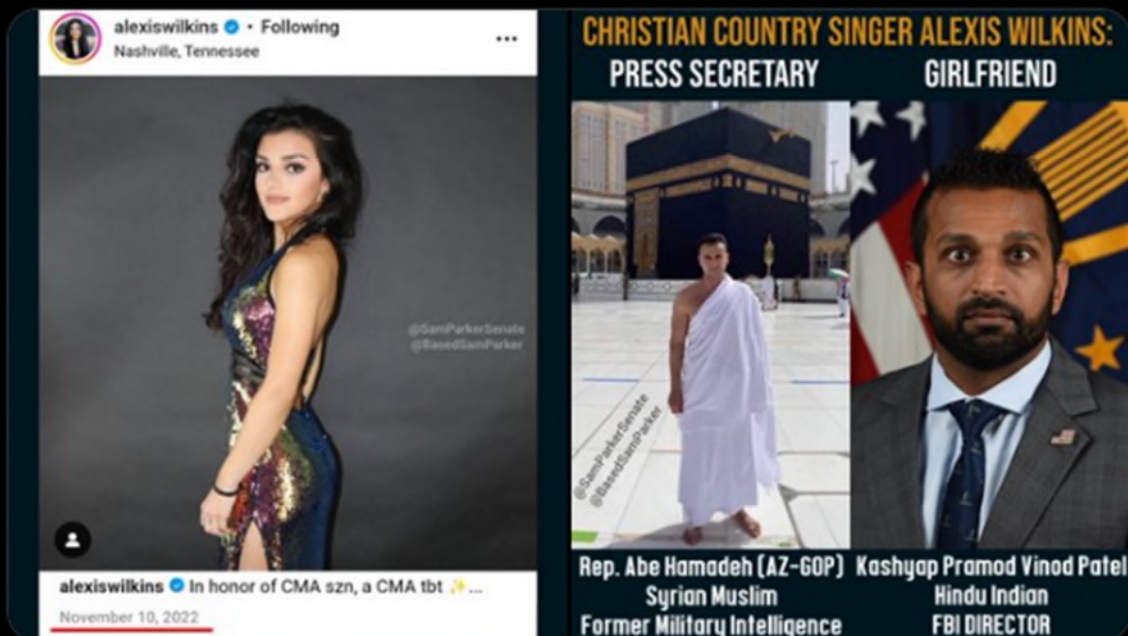


1/ WHO IS ALEXIS WILKINS--Girlfriend of Kash Patel?

Alexis Wilkins was a devout 24-yr old Christian when she met Kash Patel, a 42-yr old Hindu Muslim & started dating him. Now he's the **FBI director**. She's also the press secretary for Abraham Hamadeh, a Syrian Muslim member of the US House of Representatives from Arizona, and a "former" member of **US Military Intelligence**.

- She's also a country music singer based out of Nashville.
- She works for PragerU, is tight with The Daily Wire, & has ties to TPUSA
- She hosts her own news & political commentary show on Rumble.


Let's take a closer look at Alexis, pictured here 3 weeks after meeting Kash Patel in 2022.




9:57 PM · Feb 23, 2025 · **1.5M** Views

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Sam Parker 🇺🇸 🇩🇪 🇧🇪 @BasedSamParker · Feb 23



📄 3/ Alexis's Biographical Details

Alexis was born in 1999 in Boston, MA, then spent most of her childhood in England & Switzerland while her father attended the University of Geneva School of Economics & Management. She attended the College du Lemon International School in

[Show more](#)

each other. I was so excited to be a part of it." Alexis is an only child. Her admiration for veterans started with her family. "My family has always been huge veteran supporters and I come from a line of veterans," she explains. "My great-grandpa was in World War II and then my papa was in the Korean War. And my parents were always really big advocates of history, and learning history, because history learned does not repeat itself. I was never the kid in history class who asked, 'Why do we have to learn this?'"



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Entertainment News 'Reacher' star Alan Ritchson

Kash Patel is dating Alexis Wilkins.

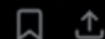
Wilkins spent most of her childhood in Switzerland and England, before the family finally settled in Nashville, Tennessee. In an interview with Independent Women's Forum, Wilkins revealed that her father has served in the US Navy during the Korean war. "He was the son of Armenian immigrants who fled genocide. My passion for veterans started through conversations with him," shared Wilkins.







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

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 4/ Personal: "Old-Fashioned" Devout Christian?


Alexis is allegedly a devout Christian who often wears a Crucifix necklace. Here, she tells of her Christian upbringing for PragerU, and sings about an "Old-Fashioned Christmas" (her biggest country music song to date, at least on [Show more](#)


 **PragerU**  



Alexis Wilkins: I Found My Voice in My Love for America



Stories of Us Sep 26, 2023 1.1m







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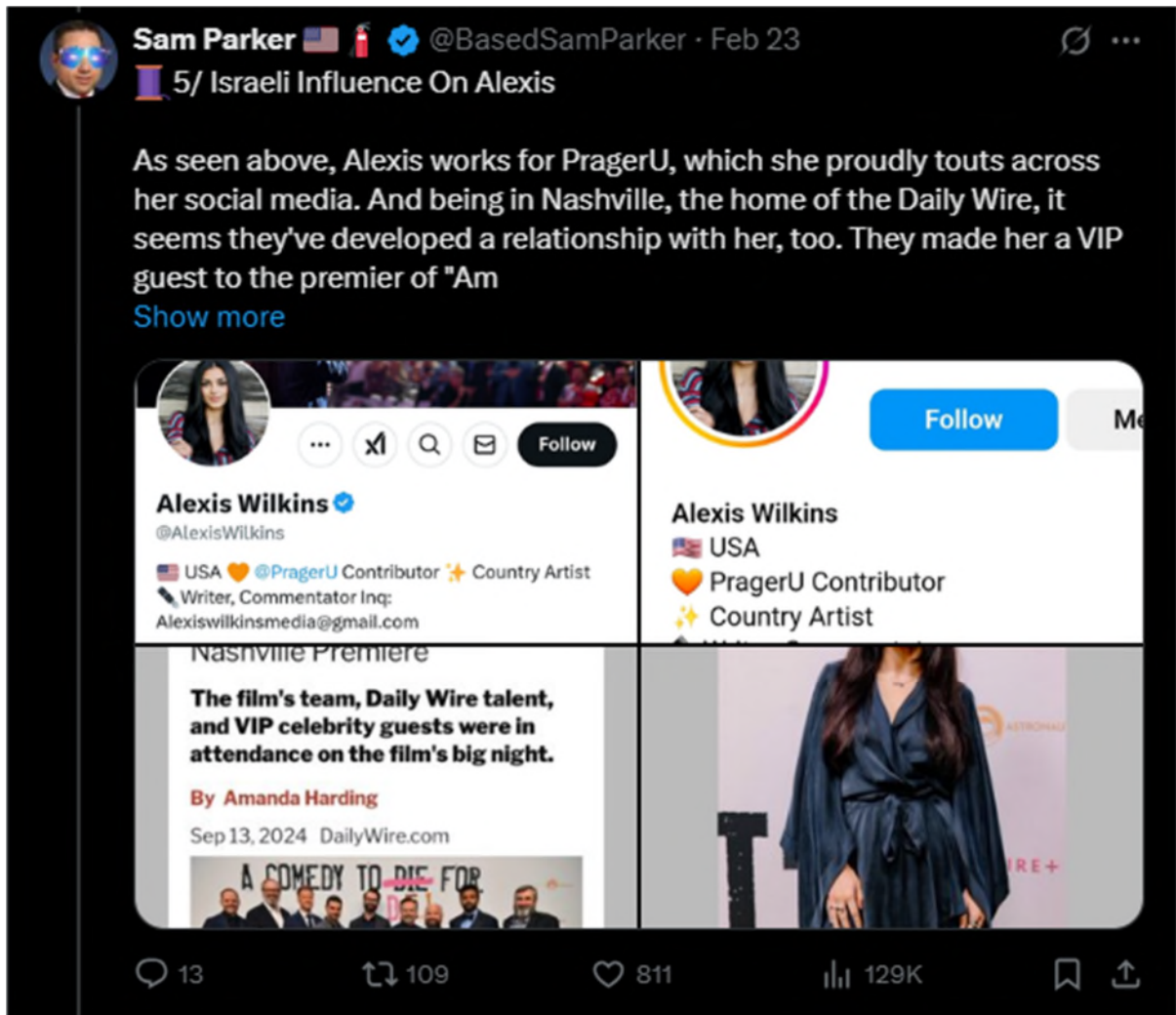


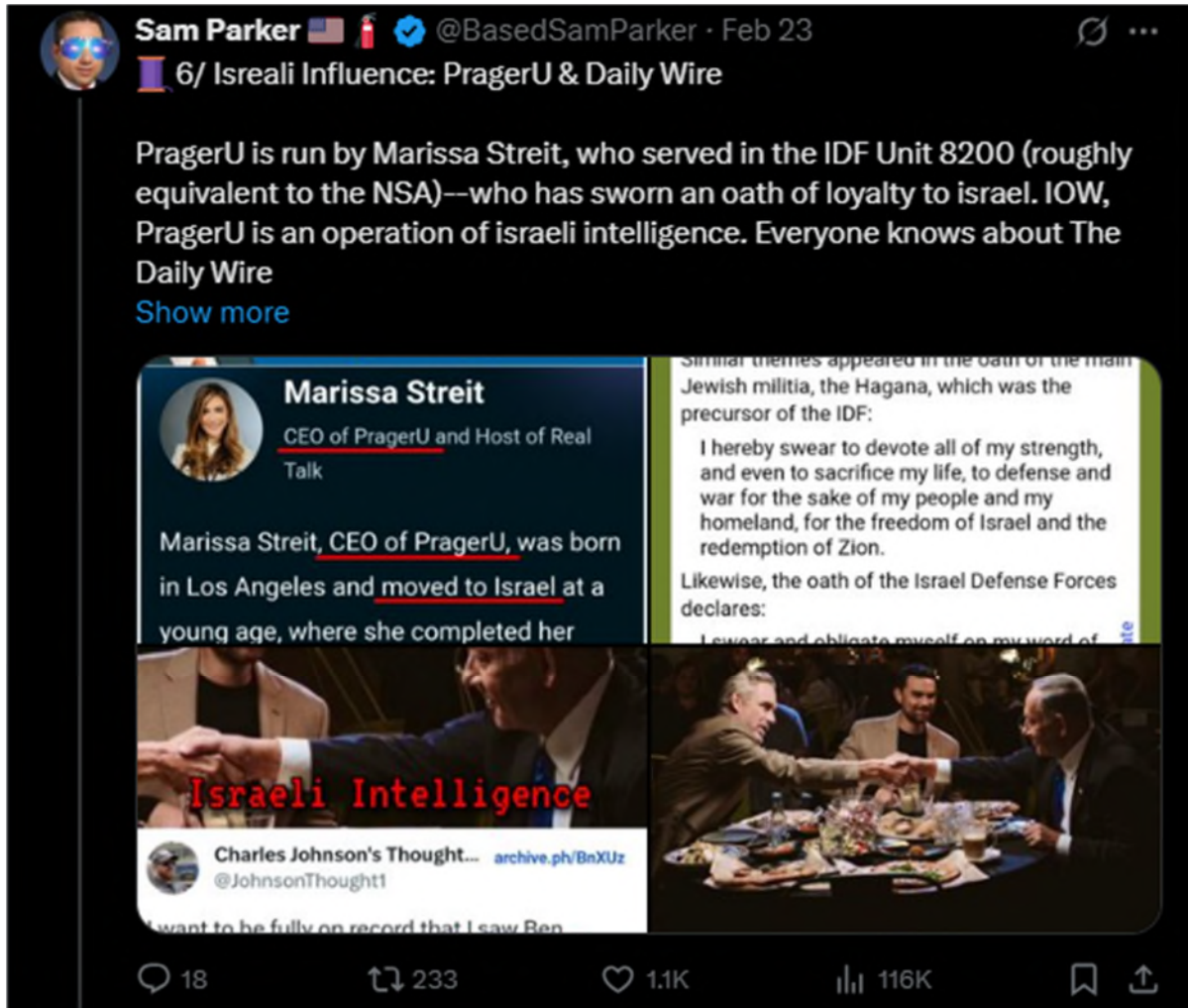
Alexis Wilkins - Old Fashioned Christmas (Official Music Video)

views 3y ago ...more

 alexiswilkinsmusic 4.91K 

 36  141  1K  201K  







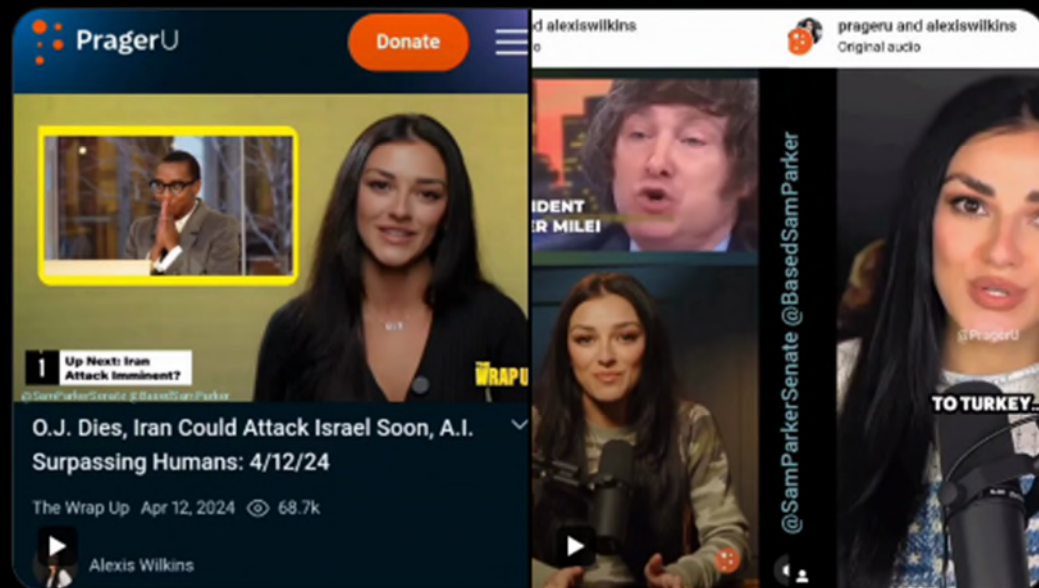
Sam Parker 🇺🇸 🇮🇱 🗨️ @BasedSamParker · Feb 23

🇺🇸 7/ Mouthpiece for PragerU & The Zionist Agenda

Below you can watch various videos of Alexis presenting pro-israel/pro-jewish propaganda for PragerU.

On the left, she presents israel as the victim of Iranian aggression. On the right, she promotes jewish zionist Chabadnik Javier

[Show more](#)




19


199

1K

147K

🔖 ↗

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 8/ Relationships To Other Known Pro-israel zionist Organizations: TPUSA & YAF

Alexis Wilkins has written for TPUSA, the pro-israel campus activist organization run by zionist Charlie Kirk. She's also been a speaker for Young America's Foundation—another pro-israel







[Show more](#)


Young America's Foundation

Excommunicates Michelle Malkin for Defending Nick Fuentes


"There is no room in mainstream conservatism or at YAF for holocaust deniers, white nationalists, street brawlers, or racists."

ROBBY SOAVE | 11.18.2019 11:59 AM


     













Religious Veil


 TPUSA HQ 07/11/2023

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 9/ Zionist/ConInc Media Footprint


Alexis's penetration into the Zionist/ConInc media is modest but growing. She's appeared on Newsmax, while her writing has been featured in The Daily Caller & Townhall. Tucker Carlson started TDC, but it's now run by his former partner, the


[Show more](#)



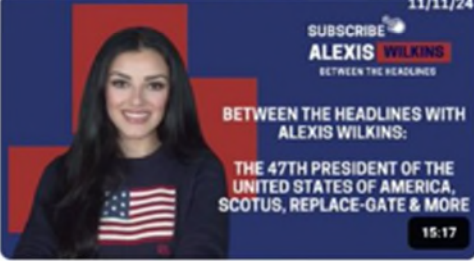
NEWSMAX ALEXIS WILKINS PNC

Media-Driven Society, Evil Thrives When The Good Are Punished











Media-Driven Society, Evil Thrives When The Good Are Punished



Between the Headlines with Alexis

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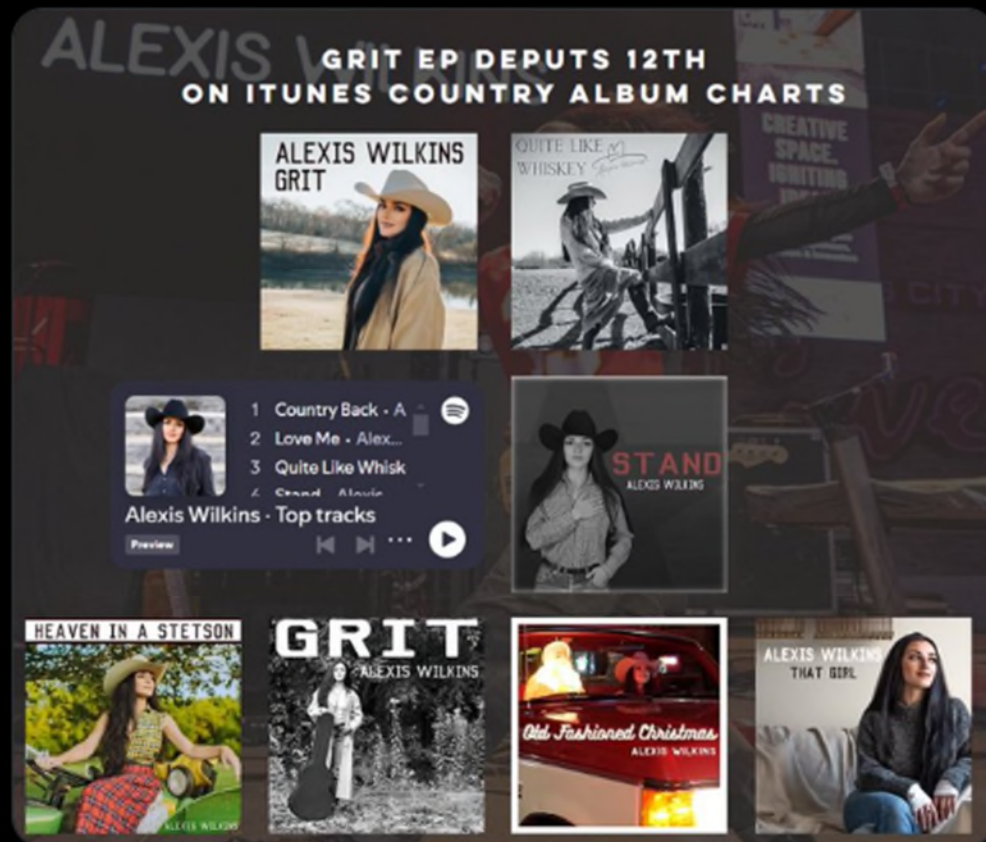


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🎵 10/ Country Music Career

Alexis's country music career is still young, but growing. You saw a sample above with her "Old Fashioned Christmas." Her music can be found on Spotify, Apple iTunes, TikTok, Youtube, Facebook and Rumble.

Her single "Grit," debuted at #12 on the [Show more](#)

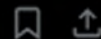






💬 6


↻ 59

❤️ 476

📊 80K




**Sam Parker**    @BasedSamParker · Feb 23


 11/ Her Views of America

Alexis sings of wanting "My Country Back," and refers to our "heritage" being "rebellion." She counsels people to read our founding documents & asks for God to bless our nation. But our God is Jesus Christ. And our heritage is White European. That's

[Show more](#)

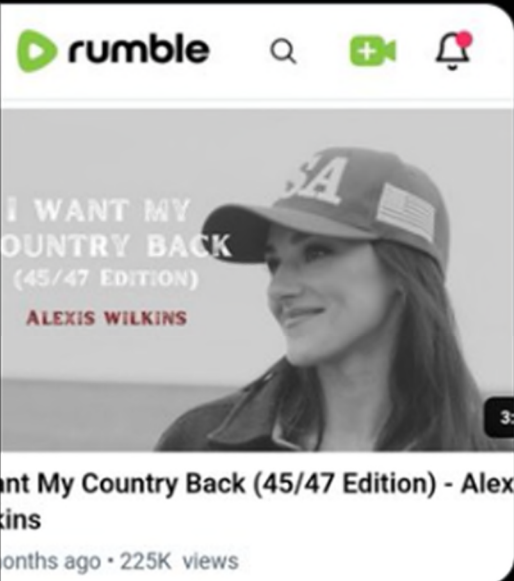





alexiswilkins • Following




alexiswilkins • Your heritage is rebellion. Happy Fourth y'all. 🇺🇸 read the founding documents today. God bless this great nation.

July 4, 2024









rumble   



I WANT MY COUNTRY BACK
(45/47 EDITION)
ALEXIS WILKINS

ant My Country Back (45/47 Edition) - Alex
kins

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 18  102  754  80K  



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🇺🇸 12/ Ties to Intelligence

Not only is she now dating the director of the FBI, Kash Patel, but she is also the press secretary of Abe Hamadeh, a Captain in US Military Intelligence and a newly member of Congress.

One might ask how an undergrad from Belmont College has achieved [Show more](#)

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@BasedSamParker

Alexis Wilkins

Rep. Abe Hamadeh (R-AZ) (Jan. 2025-), Press Secretary

Abraham Jamal Hamadeh^[1] (born May 15, 1991) is an American politician, former prosecutor, and U.S. Army intelligence officer,^[2] who is a member of the U.S. House of Representatives for Arizona's 8th congressional district, serving since 2025. He is a member of the Republican Party.

Military service	
Rank	Captain
Unit	Military Intelligence Corps

^ **Early life and education**

Hamadeh was born in Chicago, Illinois, and later moved to Phoenix, Arizona. He is the youngest child in a family of Syrian immigrants and grew up in a mixed-faith household, with a Muslim father and a Druze mother.^{[3][4]}

@SamParkerSenate
@BasedSamParker

💬 19



↻ 114


❤️ 720

📊 74K

🔖 ⬆



Sam Parker   @BasedSamParker · Feb 23

 13/ Alexis Wilkins: More Than Meets The Eye?

On the surface, Alexis's meteoric rise is a true "American Dream." But is that all there is to her?

What we have in Alexis Wilkins is an allegedly devout trad Christian woman hooking up with a much older Hindu Indian man (not so [Show more](#))

Alexis Wilkins @AlexisWilkins · Oct 7, 2023
They're only "mean tweets" if they're not working to protect our country. Tell me you feel safer now than you did when he was bringing peace to these regions. [#Israel](#) [#Gaza](#) [#MiddleEast](#)



Alexis Wilkins @AlexisWilkins · Oct 7, 2023
Peace through strength. This did not happen when we had strength in White House. [#Israel](#) [#MiddleEast](#)

Israel's Refusal to Recognize the Armenian Genocide Is Indefensible

Both Armenians and Jews have been the victims of premeditated mass murder. The Israeli government must run justice before political considerations.



Mehmed V and Enver Pasha, left, with Ottoman officials. Pasha and Turkish soldiers march down the street. (Courtesy University of Princeton Press)

"ISRAEL IS STILL DEALING WITH THIS ISSUE"
Before the Holocaust, Ottoman Jews supported the Armenian genocide's 'architect'

Author Isaac Lasker says in *Armenians: The Untold Story* that the Ottoman Empire was the first to use modern warfare.



The Jewish Rothschild wanted to abolish the Christian power in East Europe by annihilating the Armenian Christians who tended to unite with the Christian Russian Empire, but were living under the Muslim Ottoman Empire. The Jewish Donmeh 'Young Turks' were chosen to get rid of the Christian Armenians, at the same time revolt against the Muslim Sultan.

17

139

887

87K



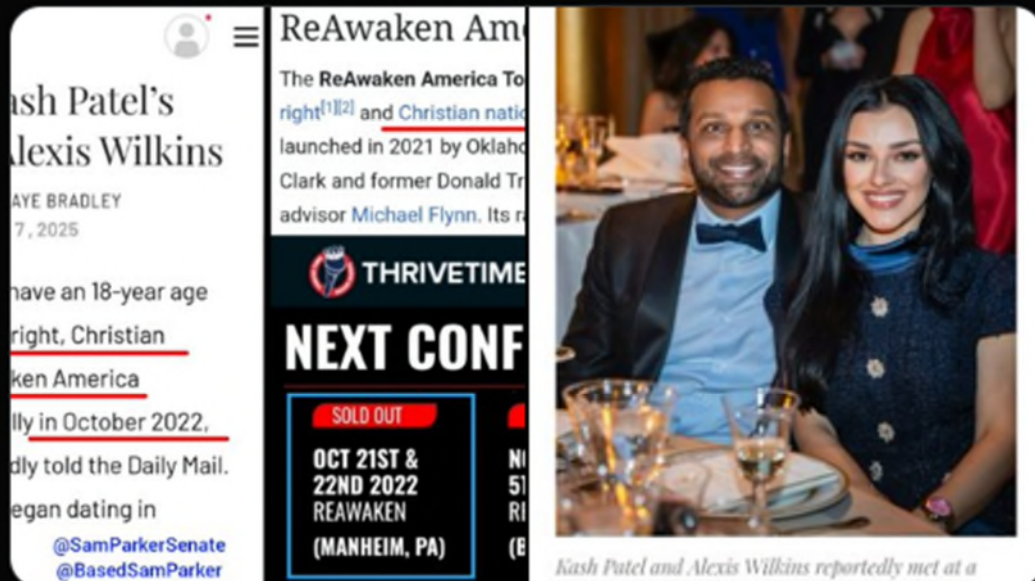
Sam Parker 🇺🇸 🇩🇪 🇬🇧 @BasedSamParker · Feb 24

📄 14/ Addendum: How They Met

Alexis met Kash Patel at a Christian Nationalist rally called ReAwaken America, launched by General Mike Flynn & prominent Q movement believers.

Again, why is a 24-yr devout Christian, hooking up with a Hindu Indian, old enough to be her dad, at a

[Show more](#)



Kash Patel and Alexis Wilkins reportedly met at a

🗨 59

↻ 128


❤ 820

📊 71K

🔖 ⬆





Sam Parker  @BasedSamParker · Feb 24

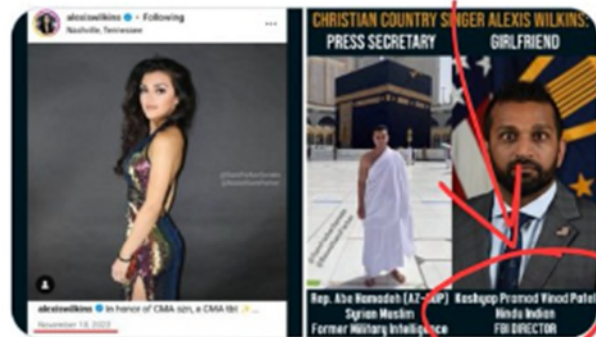
17/ I'd like to thank all the spergs & dimwits who can't identify an obvious Twitter typo. You propelled this tweet to a far larger audience than it probably would have had otherwise. Weaponized spergtardism? 🤔



Sam Parker ...  @BasedSam... · 23h  

1/ WHO IS ALEXIS WILKINS--Girlfriend of Kash Patel?

Alexis Wilkins was a devout 24-yr old Christian when she met Kash Patel, a 42-yr old Hindu Muslim & started dating him. Now he's the FBI director. She's also the press secretarty for Abraham Hamadeh, a Syrian Muslim member of [Show more](#)



730 1.3K 4.8K 830K


24


25


235

20K


**Sam Parker** 🇺🇸 🇸🇪 🇧🇪 @BasedSamParker · Nov 2
18/ Part 2: Update

**Sam Parker** 🇺🇸 🇸🇪 🇧🇪 @BasedSamParker · Nov 2
ALEXIS WILKINS, KASH PATEL UPDATE: Kash Patel's celebutante/actress girlfriend has recently claimed on Instagram that "I do not work for a spy....I make content for their platform." Get it? She doesn't work for them, she just does work for them. Quality hair splitting. ...
[Show more](#)



ACTRESS
ALEXIS WILKINS

@BasedSamParker @SamParkerSenate

**alexiswilkins** 🇧🇪 @jslayusa I do not work for a spy. The association you're making is awful, an "operative for Israel"
See my other comment on this post. The accusation you're making here is actionable on the legal side of defamation and I'm absolutely not afraid to look into that. I do not work for Prager, I have made content for their platform which is for the purpose of spreading educational videos to the youth. I am for a sovereign USA. Shame on you.
<https://www.instagram.com/p/DOrdokwkczn/comments/>
@BasedSamParker @SamParkerSenate







 6  9  65  5.5K  

EXHIBIT E

Exhibit E

Ian Malcolm, (@IanMalcolm84), X.com (Feb. 28, 2025, 3:01 P.M.),
<https://x.com/IanMalcolm84/status/1895580008594489794>.



IanMalcolm84
@IanMalcolm84

"Boy, do I hate being right all the time"

@Kash_Patel's girlfriend works with the JEWISH founded @prageru whose CEO was in the ISRAELI DEFENSE FORCE & B200 INTELLIGENCE AGENCY?

Can we spell "handler"?

H/T @Decfswe



Kash Patel girlfriend

PragerU

Donate

Marissa Streit
CEO of PragerU and Host of Real Talk

Marissa Streit, CEO of PragerU, was born in Los Angeles and moved to Israel at a young age, where she completed her primary education and served in military intelligence unit 8200 of the Israel Defense Forces. She returned to Los Angeles to earn her bachelor's degree in business and economics, and her master's degree in education and nonprofit management.



Alexis Wilkins | PragerU

PragerU

Dennis Prager

Author, Talk

Dennis Mark Prager (Prager) born August 2, 1925) is an American conservative radio talk show host and writer. He is the host of the nationally syndicated radio talk show "The Dennis Prager Show". In 2006, he co-founded PragerU, which primarily creates five-minute videos from an American conservative perspective, among other content.



^ Early life and education

Dennis Prager was born in Brooklyn to Hilda (née Friedfeld; 1919–2009) and Max Prager (1918–2014), the latter the son of Polish Jewish immigrants.^[3] Prager and his brother, Kenneth Prager,^[4] were raised in a Modern Orthodox Jewish home. He attended the Yeshiva of Flatbush in Brooklyn, New York, where he befriended Joseph Telushkin.

3:01 PM · Feb 28, 2025 · 204.4K Views



153



977



3.1K



349



EXHIBIT F

Exhibit F

Dr. Simon Goddek (@goddeketal), X.com (Jul. 7, 2025, 4:22 P.M.),
<https://archive.ph/D0BuC#selection-613.0-613.229>,
<https://x.com/goddeketal/status/1942257954251473210>

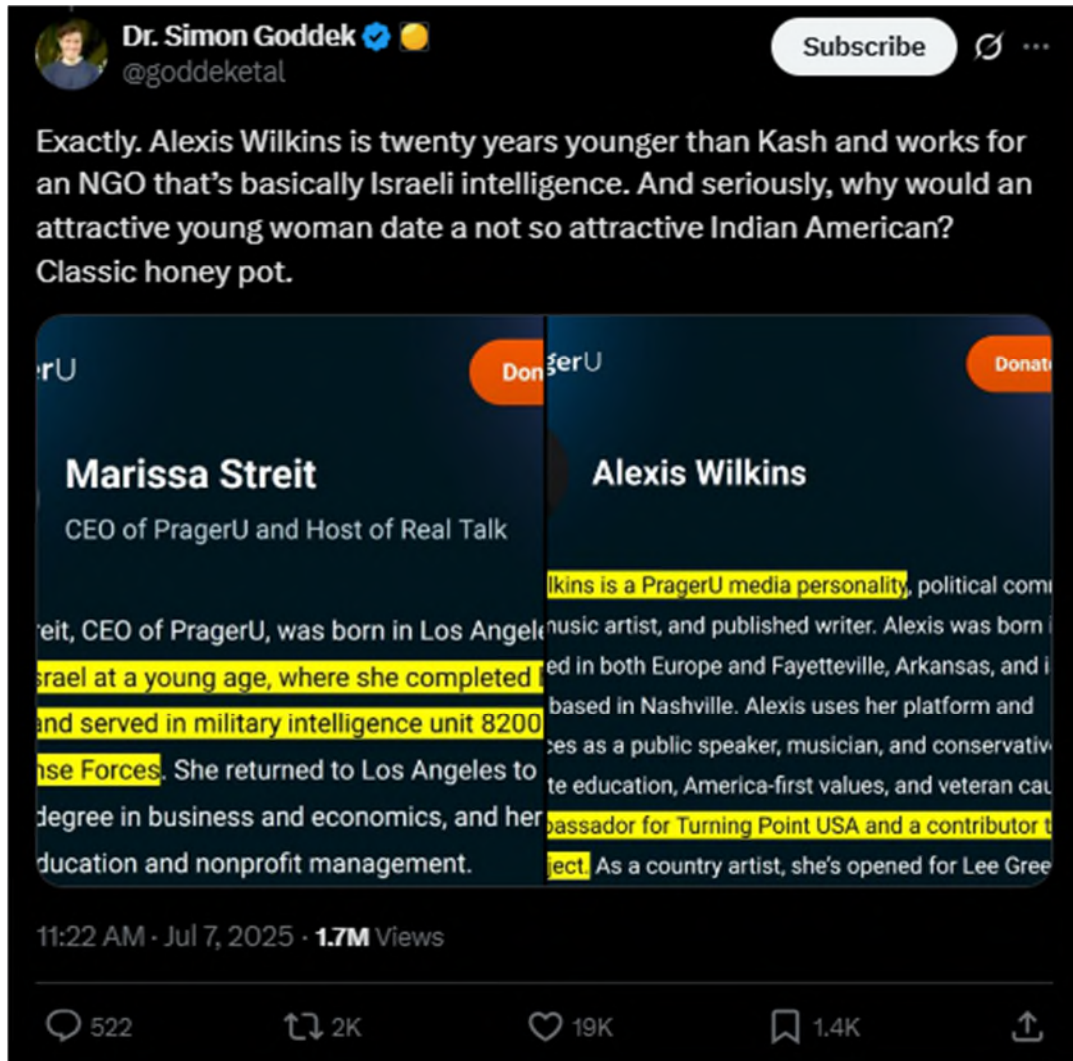


EXHIBIT G

Exhibit G

Alexis Wilkins (@AlexisWilkins), X.com (Jul. 9, 2025, 3:50 P.M.), <https://archive.ph/MO27T>; <https://x.com/AlexisWilkins/status/1943050167130746916>.



EXHIBIT H

Exhibit H

Erica Knight (@_EricaKnight), X.com (Jul. 11, 2025, 12:30 A.M.), <https://archive.ph/ZKk0V>;
https://x.com/_EricaKnight/status/1943467906907672946



EXHIBIT I

Exhibit I

Transcript of The Megyn Kelly Show, *County Singer and Kash Patel's Girlfriend on the Need to Speak Out About What's True*

Megyn Kelly, *Country Singer and Kash Patel's Girlfriend Alexis Wilkins on the Need to Speak Out About What's True*, The Megyn Kelly Show (Jul. 30, 2025),
<https://www.youtube.com/watch?v=kCQkaSxMtcQ>

.....

Speaker 1 – Megyn Kelly 00:57

All right, so this becomes relevant. I'm not just making small talk, because you will, in 2025 America be accused of being an Israeli spy, that you work for Mossad, and near as I can tell, this is only because you're dating Kash Patel. That's probably it, to be honest. But, but I guess if we have to go to a second criterion, it would be that you've done work with PragerU, with our friend Dennis Prager, who is totally brilliant, and that institution has produced a lot of conservatives who are all over the internet. I think you might be the first of being accused of being an Israeli spy, just because you've done a stint with PragerU, but do you think I have the entirety of the evidence quote against you spelled out here?

Speaker 2 – Alexis Wilkins 01:50

I think that's it, you know. I think people see certain pieces, and I get it. They want to connect things, they want to justify, you know, some of the pain that they've been through watching the last four years. And there's pieces of this that, you know, I can-I understand, but I think that they've taken just these pieces of evidence that you've laid out and tie them together in all of the wrong ways. I think, you know, PragerU is a great institution that is, as you know, Megyn, sets out to educate the youth, you know, make short form content to try to influence people's opinions, educate them on things that they might not understand, constitutional education. I focused a lot in constitution and policy education in my videos, you know, all of this was to speak out about my experience in college and try to tell the youth that they don't have to bend the knee to the left woke institution and make content that would be of good service to the youth, as I decided that I couldn't stay silent anymore. So seeing these things twisted is not only very confusing, very out of left field for me, but also incredibly disheartening.

.....

Speaker 1 – Megyn Kelly 05:00

Because this is relevant too, I'm not being unnecessarily probing. It's just that people are accusing you of sort of being the honey pot where, you know, like, they'll send over a spy to sort of get one of our officials, like an Eric Swalwell type, to sleep with them, like China does this, and some of these dopes do it, and before they know it, they've been compromised. And by the way, there's been like no follow up on him and that whole thing, but that's what some have said. But you, boy, if you're, if you're a spy trying to get in with Trump administration officials, you are really playing the long game, two and a half years before

Trump even got into office, picking some random associate of Trump's and betting on him becoming our FBI chief.

Speaker 2 – Alexis Wilkins 05:39

Right? It would have been a really long game play. And the thing here too, is that, you know, you don't know where life is going to go. You don't know where these things are going to take you. You... Even before I met Kash, you know, being committed to this movement and saying, "Okay, there's something seriously wrong with our country." And there's sacrifices in music that I'm being asked to make, and there's sacrifices in college that I'm being asked to make. You know people that want you to donate to certain super PACs in order to get on certain tours. It's egregious, the things that you run into, and you either go, "Okay, I'm either going to be a part of this or I'm going to speak against it." And my values led me to speak against it, and so to live my life, you, very publicly, honestly. I mean, my, my social media, goes back, you know, far enough to tell that that I have a long history of this, of speaking about American values and making sure that people know exactly where I'm coming from. You know, I've worked with veterans organizations for a long time. These are the things that I've held for a long time, the beliefs I've held for long before I met him, and so it's hard when you make these decisions to sacrifice what I think the mainstream would call success in your career, to commit to an ideology and speak out against what the Biden administration was doing, have my show on rumble weekly, call between the headlines where I was calling all of this out... For people to act like there's not enough information out there about me to glean a real conclusion on all of this kind of vigilante research is bizarre to me, you know, as a... as a... pretend I'm a third person. It just, it doesn't make any sense.

.....

EXHIBIT J

Exhibit J

Transcript of The Megyn Kelly Show, *FBI Director Kash Patel's Girlfriend Alexis Wilkins Responds to Internet Trolls Who Say She's Mossad*

Megyn Kelly, *FBI Director Kash Patel's Girlfriend Alexis Wilkins Responds to Internet Trolls Who Say She's Mossad*, The Megyn Kelly Show (Jul. 30, 2025), <https://www.youtube.com/watch?v=S10WGaxrSII>

Speaker 1 – Megyn Kelly 00:00

You, this gal who grows up for large part in Arkansas, attracted to country music. You become a country music singer and star. You are very involved in veterans' charities. You're Christian. You went to a Christian university. You stood up for yourself without doing the liberal talking points there, made a record of what they were doing to you. You get a show on Rumble. I mean, this is like, you know, basically your next step will be Fox News Correspondent in the grand scheme of life. But for some reason, the Epstein thing gets blamed on you, and there's a lot of this on the internet. There are people with millions and millions of followers in posts that have been seen millions and millions of times accusing you of being a spy for Israel, mostly, mostly Mossad spy. Could be other spies. We cut just one in sound bite form, but there's so much more. Here's just a sample.

Speaker 2 – Sample Sound Bite 00:52

Is the director of the FBI caught up in an Israeli honey pot operation? All right, here's the context. Quote. "Some social media users have wondered whether the FBI and the U.S. Justice Department's refusal to release the list of Jeffrey Epstein's clients could have something to do with Alexis Wilkins, the 26 year old girlfriend of 45 year old FBI Director Kash Patel." This is what people online are pointing to, the fact that Patel's girlfriend Alexis Wilkins works for PragerU, which is a media company that supposedly espouses American values, except for the fact that it is run by a former Israeli military intelligence officer. Now I did a bunch of digging, and unfortunately, there's actually not a lot of public information to go off of in terms of Alexis Wilkins background. She lived in England and Switzerland before settling in Fayetteville, Arkansas when she was nine. It also says that she attended college, du Lemon International School, in Switzerland. Now, interestingly, Chat GPT is calling this a strange biographical gap in that she has no visible friend network or public high school college cohort interviews, which they say is unusual for a public figure in entertainment, and that if a Mossad asset were inserted early in life, these gaps would be precisely where you would hide alternate history or handler training. Anyway, I'm not sure what's true or what's not true, but evidently these are quote classic elements used in honey pot operations: soft power, ideological alignment, and sexual emotional entanglement.

Speaker 1 – Megyn Kelly 02:22

Okay. The only piece of that that I can glean that is actually true is the CEO of PragerU is actually, acknowledges on her bio that she served in military intelligence with the IDF. So she, the CEO of PragerU has an affiliation, but there's nothing like that about you. So when's this started coming out? Were you shocked? I mean is, do you think this is really, basically just that you're with Kash?

Speaker 3 – Alexis Wilkins 02:48

I was shocked. I knew that, you know, that Prager was, this is kind of something that, I think, people in the deep sides of the internet like to pick at, you know, when they can't figure out what else is wrong, so some of it didn't surprise me when it first started coming up. I was like, all right, you know, this looks like this is what they're focusing on today. But then to your point, Megan, these posts got millions of views. And you know, I could list all the ways that this hurt me and my family, but some examples are the fact that people begin harassing you, people start doxing your family, people start, you know, accusing you, just aside from all the other stuff that's hurtful, the fact that I've dedicated myself to this movement, to good values, to speaking to children, to doing things that I thought were good, that were in line with my values, but also the fact that it's accusing me of manipulating the person that I'm with, that I love. You know, that's a horrible accusation. And seeing this pop off on the internet. I think the initial ones actually didn't tag me, so it was very bizarre to kind of start to see this roll in on my twitter and it not being a—or my X—and it not being a good influx of what people were talking about was very surprising. Yes.

Speaker 1 – Megyn Kelly 03:56

Now what, what did Kash say? Because it's always, it's easier to take the slings and arrows yourself than to see them come to your loved one.

Speaker 3 – Alexis Wilkins 05:57

I think so. I, you know, I think that it's, it's hard when you see anyone you love being attacked for something that you're doing. You know, I've encountered it on the smaller scale, as I've been a public figure for long enough to see, you know, people try to pick at my, you know family, try and find people online. You know, they this is something that people do. Hence, you know, it's funny, referring back to the Chat GPT investigation that was held on, on the site you played, you know, that there aren't any interviews of my friends? Well, there aren't any interviews of my friends because I don't want the internet to attack them, you know, I think it's pretty sensical. But no, he's, he's, he's dedicated to the American people as he always has been. You know, I think that what, when people get into government, they, they don't just, you know, snap into something else. You know, people have the same mission that they did on the campaign trail and, and, during the time before they were in government, which is really all I can say on that. But I think that, you know, ultimately, it's been hard to see me come into the line of fire for something he's already dealing with.

EXHIBIT K

Exhibit K

Transcript of Try That in a Small Town Podcast, *Bison Heads and Spy Accusations – A Chat w/ Alexis Wilkins :: Ep 67*

Bison Heads and Spy Accusations – A Chat w/ Alexis Wilkins :: Ep 67, Try That in a Small Town Podcast (Aug. 4, 2025), <https://www.youtube.com/watch?v=ZipsSEtZb84>

25:24

Okay, so that's interesting. Let's know, would you ever consider getting into politics?

25:31

She already is.

25:32

Well, you are kind of, kind of, but you're a little displaced.

Alexis Wilkins 25:37

I think, I think that I live in a, you know, I know people like to say never say never to these questions and leave it a little cheeky, but I, this is, this is a tough industry. The political industry is a tough industry and I think that ultimately, looking at the ins and outs of it. I'm really happy to be on the commentary and educational side. I love the Constitution. I love teaching people about the Constitution. I love informing people about their God given rights, because it's not taught in schools anymore the way that it should be. I know that I learned that from my parents, my grandparents, my grandpa that I call Papa, he served in the Korean War. I didn't learn about the Korean War in school. What's wrong with that? And so I'm really happy being on this side of things. And you know, being a, being a small leg of support to the political system, or not system, but you know, to that realm of things, I'm happy in that spot. And if that ever changes, you know, I feel like that's something I can assess as we go along.

26:46

Can you still run for office if you're a spy?

26:49

Now, that's, that's a great question.

26:52

That's a great, that's a great question. [overlapping discussion].

26:57

I gotta check it out. There's rules we have here.

Alexis Wilkins 26:59

Someone had to take the air out of the balloon. You know.

26:57

You gotta say, I read that, and knowing you, it gave me a really good laugh. Because if you are a spy, you're a really good spy.

Alexis Wilkins 27:12

I should have taught classes, honestly. Yeah. It's, it's funny, and it's, it's, it's hard, because it's in the thick of it now, as of, as of us recording this, and I, I like levity on it, because I think that's the only way to deal with things. So I think it's, yeah, there's elements of it that I think are truly hilarious. There are elements of it that I think are, you know, you read these things about yourself, and you go, it almost, almost makes you more sad that they're using photos and of memories that made you happy. You know, they're like, they're like, clipping photos. There's a clip of a photo. Now, I don't want to say this and everyone go, you know, mean people go and hunt for it, but it's already up there. There's a photo of, you know, my, my grandpa, who I was just saying, I call Papa, who is passed on now, and they are going and hunting that photo down and putting it on the internet and, you know, desecrating what it means to me or not means to me, but you know what it means in the public specter and trying to make a thing out of it, and chase these things down, trying to find my family. And there's a photo of me and my dad on my first Halloween, and they clip this and put it online and try to make it, you know, something horrible. And it's, um, it's, it's definitely a unique experience. There's not really a support group for this kind of thing, which is fine, but it's, yeah, it's, it's, it's fascinating, but you're right. I mean, given the circumstances, I would have been doing a bang up job. That was the truth.

28:34

Maybe she's a spy. But she's really good. So funny.

28:43

It was like, well, and it's obviously, you know, we can bring some levity to it, but it's awful, I'm sure, and just to have those accusations is unfathomable.

Alexis Wilkins 28:51

Well, it's just, you know, you feel bad of the whole circumstance. I feel bad that it's something either, they're dealing with serious stuff up there in DC, and the fact that I have to go, "Hey, this is also going on online." You know, I don't want to bring that to him either, make it his deal. Of course, he's like, it's like, it's, he's not bothered by it, by, you know, by me bringing it. But it's just, yeah, it's been, it's been a very unique experience. I always thought that the left would, would cancel me, but apparently, I was too educational and brought too many people over to our side and it was the, it was the, it was the right, thinking they'd found something instead.

29:23

There are stupid people all over.

Alexis Wilkins 29:26

They're all over the place. They hand that stuff out for free.

29:30

That's good.

29:31

It's amazing. Yeah, I mean, never underestimate someone's ability to be truly stupid. It will blow your mind.

29:37

I agree.

Alexis Wilkins 29:39

And it's always like, you know, the internet's made it, if you're looking for it, it's there, like, you know, and then people go off and riff and...

EXHIBIT L

This is more than 8 months old.

Kash Patel disputes whistleblower revelation about FBI ‘honeypot’ agent spying on Trump campaign



Kash Patel, President Donald Trump's choice to be director of the FBI, appears before the Senate Judiciary Committee for his confirmation hearing, at the Capitol in Washington, Thursday, Jan. 30, 2025. (AP Photo/J. Scott Applewhite) Kash Patel, President Donald Trump's choice ... more >

By Kerry Pickett
The Washington Times
Monday, March 3, 2025

FBI Director Kash Patel is disputing a bureau whistleblower who identified a female undercover FBI agent as a “honeypot” who infiltrated President Trump’s 2016 campaign.

Mr. Patel took to social media to dispute that the female agent was not a honeypot. A honeypot is an undercover operative who feigns sexual or romantic interest to obtain information from a target.

“Just like when I exposed grotesque violations and fraud leading the House Intelligence Committee’s investigation into Crossfire Hurricane calling out corrupt actors; I will equally defend those attacked falsely,” Mr. Patel said. “A female agent was falsely referenced in the media this week as part of an alleged whistleblower disclosure — she was NOT a honeypot.”

The whistleblower, who made the claims in a disclosure to Congress, identified a top agent in the New York field office as one of the FBI investigators assigned to infiltrate the Trump presidential campaign in 2015 as part of an off-the-books operation by then-Director James B. Comey.

The Washington Times reported on the whistleblower disclosure last week. The Times also reported that the FBI was investigating Mr. Comey's off-the-books operation sending two honeypot agents into the Trump campaign.

Mr. Patel's statement Friday on social media did not reference the allegations about a second honeypot agent.

Mr. Patel, who was confirmed as FBI director on Feb. 20, said he "reviewed the matter" and that the agent who wasn't a honeypot "did the limited job assigned to her."

MY TIMES[VIEW ALL](#)

Secret Service discovered a hunting stand with view of Trump's Palm Beach airport runway
Trump to pay 50% of food stamp benefits this month, but says no more money after that
Senate leaders suggest shutdown 'off-ramp' may be near

He did not describe the "limited assigned job" nor who assigned the job to her.

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The agent's actions related to the Trump campaign were also reviewed by special counsel John Durham, who also found no evidence of wrongdoing by her, he said.

"I will always be the first to push for accountability from within, my track record has established that, but we do [not] establish guilt by association in this FBI," Mr. Patel said.

Mr. Comey's off-the-books investigation of the Trump campaign in 2015 was revealed by an agency whistleblower in a protected disclosure to the House Judiciary Committee last year and first reported by The Times in October.

A new whistleblower disclosure given to the Senate Judiciary Committee last week said the female agent from the FBI's New York office was involved in the attempt to have undercover agents target the Trump team.

The Times reviewed the documents.

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The FBI asked for the agent's identity to be shielded because disclosing her name could compromise "the safety of the agent."

According to the disclosures, the female agent was the handler of one or more FBI undercover agents who targeted Mr. Trump and his team. She also participated as one of the undercover agents.

• *Kerry Picket can be reached at kpicket@washingtontimes.com.*

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**olejim** 🏆 Hall of Famer

SC Durham reported October 2016 Presidential Bunker Briefing officially noted BILLARY solely financed Russiagate as her black ops election insurrection... all 50 remaining silent the next 9 years should be firing squad as Treason it was!!

Reply 🗨️ 👍 1

245 days ago

office 🚩 Trailblazer

I trust Patel and his good judgement. If he continues to act as an honest, respectable and unbiased director, he will earn the respect and loyalty of agents; even the ones who personally don't like Trump that much. Keep in mind some of these agents involved in the lawfare attacks against Trump may have done it because they were ordered from above, and didn't want to be reprimanded by the corrupt director from the last administration.

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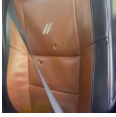
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Colorado's rogue Supreme Court attempts another insurrection



Pelosi labels Trump the 'worst thing on the face of the Earth'



Police report omits a federal agent's shooting at a DC driver. The man's lawyers suspect a cover-up



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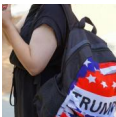
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The trial of Jeb Boasberg



Former FBI agents go to bat for Kash Patel to be the bureau's next director



FBI files show targeting of Catholic groups was bigger than Biden-era officials acknowledged

EXCLUSIVE

LATEST VIDEO

EXHIBIT M

THE HONEY TRAP

The FBI Used an Undercover Cop With Pink Hair to Spy on Activists and Manufacture Crimes

Protestors demonstrate in Colorado Springs following the murder of George Floyd, on May 30, 2020. Photo: Chancey Bush/The Gazette via AP



Trevor Aaronson

March 21 2023, 6:00 a.m.

THE YOUNG WOMAN with long pink hair claimed to be from Washington state. One day during the summer of 2020, she walked into the Chinook Center, a community space for left-wing activists in Colorado Springs, Colorado, and offered to volunteer.

“She dressed in a way that was sort of noticeable,” said Samantha Christiansen, a co-founder of the Chinook Center. But no one among the activists found that unusual or alarming; everyone has their own style. They accepted her into the community.

The pink-haired woman said her name was Chelsie. She also dropped regular hints about her chosen profession.

“She implied over the course of getting to know her that she was a sex worker,” said Jon Christiansen, Samantha’s husband and another co-founder of the Chinook Center.

“I think somebody else had told me that, and I just was like, ‘Oh, OK. That makes sense,’” said Autum Carter-Wallace, an activist in Colorado Springs. “I never questioned it.”

But Chelsie’s identity was as fake as her long pink hair. The young woman, whose real name is April Rogers, is a detective at the Colorado Springs Police Department. The FBI enlisted her to infiltrate and spy on racial justice groups during the summer of 2020.

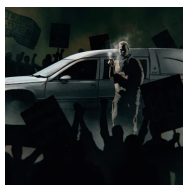


April Rogers, left, a police officer who went undercover for the FBI in the Colorado Springs activist community, participating in a housing-rights march during which several activists were

The FBI used an undercover cop with pink hair to spy on activists and manufacture crimes. The Intercept arrested. Photo courtesy of Chinook Center.

The work of Rogers, or “Chelsie,” is a direct offshoot of the [FBI’s summer of 2020 investigation in Denver](#), where Mickey Windecker, a paid FBI informant, drove a silver hearse, rose to a leadership role in the racial justice movement, and encouraged activists to become violent. Windecker provided information to the FBI about an activist who attended demonstrations in both Denver and Colorado Springs, prompting federal agents to launch a new investigation in the smaller Colorado city. I tell the story of Windecker and his FBI work, as well as the investigation in Colorado Springs, in “[Alphabet Boys](#),” a 10-episode documentary podcast from Western Sound and iHeartPodcasts.

As the FBI’s Colorado Springs investigation reveals, Denver wasn’t the only city where federal agents infiltrated racial justice groups that summer. Working through the Joint Terrorism Task Force, a partnership with local police, the FBI assembled files on local activists using information secretly gathered by Rogers.



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The FBI Paid a Violent Felon to Infiltrate Denver’s Racial Justice Movement

Once Rogers gained trust among the activists, she tried to set up at least two young men in gun-running conspiracies. Her tactics mirrored those of Windecker, who [tried to entrap two Denver racial justice activists in crimes](#), including an FBI-engineered plot to assassinate Colorado Attorney General Phil Weiser that went nowhere.

To reveal what happened in Colorado Springs, I obtained search warrant applications, body-camera video from local police assisting the FBI investigation, and recordings of conversations involving federal agents; reviewed hundreds of pages of internal FBI records about [Social Media Exploitation](#), a program federal agents used to monitor racial justice activists nationwide; and interviewed about a dozen activists who were targeted in the federal probe.

The FBI declined to be interviewed about the Colorado Springs investigation and refused to respond in writing to a list of questions. The Colorado Springs Police Department also declined to comment, referring all questions to the FBI.

For her part, April Rogers won't say anything. When called as a witness in a state court hearing, she testified that the Justice Department instructed her not to answer questions about the FBI investigation. "I've been told to respond, 'I respectfully decline to answer,'" Rogers said under oath. The Colorado Springs Police Department declined to make her available for an interview.

This FBI investigation in Colorado Springs, 70 miles south of Denver, shows that federal law enforcement had embarked on a broad, and until now, secret strategy to spy on racial justice groups and try to entrap activists in crimes. "It's disturbing, but not surprising, to learn the FBI's reported targeting of racial justice activists in 2020 wasn't limited to Denver," Sen. Ron Wyden, D-Ore., told The Intercept. "It is a clear abuse of authority for the FBI to use undercover agents, informants, and local law enforcement to spy on and entrap people engaged in peaceful First Amendment-protected activities without any evidence of criminal activity or violent intent."

The probe in Colorado Springs also raises questions about FBI priorities and the bureau's perceptions of threats. As federal agents investigated political activists there, they also launched, and promptly dropped, an

investigation of a man running a neo-Nazi website – a decision that would have deadly consequences.



A protester confronts a Colorado Springs police officer about the death of De'Von Bailey, 19, who was shot and killed by police in 2019, during a 2020 protest against police brutality in Colorado Springs, Colo. Photo: Chancey Bush/The Gazette via AP

“Nowhere Is Safe”

The murder of George Floyd sparked protests in Colorado Springs, as in cities across the nation in the summer of 2020. Activists there were angered not only by Floyd's death, but also by the [killing of a local man, De'Von Bailey](#), who was shot in the back by police officers in 2019.

On August 3, 2020, as racial justice demonstrations roiled the nation, Colorado Springs activists [organized a protest](#) outside the suburban home of Alan Van't Land, one of the officers involved in Bailey's death.

"Alan Van't Land, we are calling you a murderer," a demonstrator yelled into a bullhorn.

"Murderer!" the other demonstrators repeated.

"Alan Van't Land, we are calling you an assassin," the man with the bullhorn continued. "Alan Van't Land, we are calling you a racist. Alan Van't Land, you are a pig."

"Pig!" the demonstrators chanted. "Pig!"

They blocked the road through the neighborhood, and the protest escalated. A driver trying to pass through got into a verbal altercation with Charles Johnson, a Black activist and college student. Following the argument, Johnson allegedly swatted the driver's phone out of his hands.

Other demonstrators recorded the encounter, and that and other footage from the protest circulated among far-right social media accounts as examples of the apparent dangers of racial justice and antifascist activists. Michelle Malkin, a conspiracy theorist who lives in Colorado Springs, [tweeted](#): "Nowhere is safe."

Most of the protesters wore face masks due to the pandemic, making it difficult for police to identify them, but the FBI had a source on the inside: Rogers, the young detective who suggested that she was a sex worker named Chelsie. The day after the demonstration, Rogers contacted Jon Christiansen. She said she had a filing cabinet to donate.

"And I was like, 'Yeah, sure. We need all kinds of stuff,'" Christiansen remembered telling her.

A couple of days later, Rogers dropped off the cabinet.

“This giant filing cabinet,” Christiansen told me, pointing to it inside the Chinook Center. “In retrospect, after the fact, we’re like, ‘Right, that looks like a filing cabinet that would be in a police station.’”

Rogers began volunteering regularly to help with administrative tasks. Several organizations used the Chinook Center as an office, including a local tenants’ union and a group that organized racial justice

For a year, Rogers went unnoticed as she spied on activists from the inside.

demonstrations, and Rogers had access to their membership records and email accounts. Christiansen didn’t know that Rogers, rifling through various files, was feeding information to the FBI.

For a year, Rogers went unnoticed as she spied on activists from the inside.

On July 31, 2021, the Chinook Center activists organized a housing rights rally to coincide with the city’s 150th-anniversary celebration. Rogers and other demonstrators marched down the city’s streets, many carrying “Rent Is Theft” signs and wearing red shirts that read “Housing Is a Human Right.”

The activists did not know that Colorado Springs police, working with the FBI, planned to arrest several of them that day.



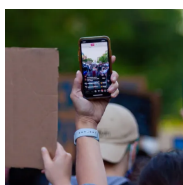
In body-camera footage, Colorado Springs police Officer Scott Alamo revealed an intelligence report filled with pictures of local activists taken from social media. Credit: Colorado Springs Police Department.

“Boot to the Face”

Sitting in a police cruiser, Officer Scott Alamo waited for the protesters. His body camera recorded him talking to other officers in the car.

“Well, boys,” Alamo said. “We sit, we wait, we get paid.”

Alamo pulled out a report with pictures of the activists they intended to arrest. The report, which Alamo accidentally revealed on his body camera, appeared to be a product of an FBI program known as Social Media Exploitation, or SOMEX, which allows the FBI and local police to mine social media for information about individual Americans without warrants. The photos in the report weren't mugshots; they were images from social media, including Facebook, Instagram, and LinkedIn.



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FBI Provides Chicago Police With Fake Online Identities for “Social Media Exploitation” Team

Internal records [obtained by The Intercept](#) last year revealed that the FBI and the Chicago Police Department used SOMEX to collect information about racial justice demonstrators in that city. [Additional documents](#) obtained by the national security-oriented transparency nonprofit [Property of the People](#) show that the FBI monitored social media activity, including Twitter posts and Facebook event pages, of racial justice activists in Washington, D.C., and Seattle. These internal documents also revealed that the FBI wanted to keep its social media activity secret. One document described the FBI's need for new software solutions that could provide more invasive data mining of social media while maintaining “the lowest digital footprint.”

As Alamo looked at the SOMEX report, he focused on a photo of Jon Christiansen taken from one of his social media profiles.

“Professor?” Alamo asked his colleagues in the car, referring to Christiansen's position as a sociology professor at a local college. He continued flipping through the report. “Boot to the face,” Alamo announced gleefully. “It's going to happen.”

And it did. More than a dozen cops stormed into the housing march looking for activists whose photos they'd seen, including Christiansen and Johnson, the man who'd gotten into the altercation at the demonstration a year earlier.

Jacqueline Armendariz Unzueta, an activist and Colorado-based staffer for Democratic U.S. Sen. Michael Bennet at the time, was walking her bike just beyond the melee. "And I see what I thought was a bunch of cops dog-piled on the entire crowd," she recalled. "And I was like, 'Holy shit, they're coming for everybody, then? What the fuck?' Just shell-shocked."

As she turned around, Armendariz Unzueta saw a police officer dressed in riot gear charging toward her. Her fight-or-flight response kicked in. Another officer's body camera captured the encounter.

"I just threw my bike down and was like, 'Bitch, you're coming for me?'" Armendariz Unzueta said. "That's the honest truth."

The bike's bell gave off a short ring as it hit the concrete, landing between Armendariz Unzueta and the charging officer. The bike did not touch the officer, who sidestepped it and continued toward the crowd of demonstrators.

"I just reacted," Armendariz Unzueta told me.

Armendariz Unzueta was wearing a bike helmet, oversized sunglasses, and a face mask, making her difficult to identify from the video. But police, working with the FBI, knew where to look – no warrant needed – for their most-wanted cyclist: social media.

"Sometimes You've Got to Laugh to Keep From Crying"

A Colorado Springs detective assigned to the Joint Terrorism Task Force started looking for the mysterious masked woman with the bicycle. Daniel Summey pulled up the social media accounts of known Chinook Center activists and then searched their friends lists. From there, Summey found Armendariz Unzueta's accounts, including photos in which she wore the same shoes and helmet that could be seen in the police body-camera footage.

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Summey wrote a search warrant application for Armendariz Unzueta's home. In it, he observed that demonstrators at the housing march carried red flags. "The red flag is significant in that it is a radical political symbol, and designates the march ... as revolutionary and radical in nature," he wrote, basing his claim on [this website](#) about red flags, which notes that "the red flag has, predominantly, become a symbol of socialism and communism."

Summey's application suggested that the FBI was using political ideology as a basis for investigation, which is against the bureau's stated policy. "We don't investigate ideology," the FBI's Director Christopher Wray told a Senate committee in 2019.

Summey also attached pictures of Armendariz Unzueta from social media, including a nearly full-page photo of her in a bikini that had no relevance to the investigation.

"Sometimes you've got to laugh to keep from crying," Armendariz Unzueta told me when I asked her about it.

Police searched her home, took her bicycle and electronic devices, and charged her with attempted aggravated assault on a police officer – a second-degree felony.





Jacqueline Armendariz Unzueta (left/top) pushed her bike down in a panic as a police officer in riot gear charged toward her during a housing-rights march. Minutes later, police arrested Charles Johnson (right/bottom), forcing him to the ground. Left/top photo: Colorado Springs Police Department. Right/bottom photo: Colorado Indigenous Brown Berets.

“I Never Saw Any Grenades”

Rogers, meanwhile, began to invite young male activists to her apartment. In a recording I obtained, an FBI agent in Colorado Springs confirmed that meetings between Rogers and at least two activists occurred. Although the possibility of a sexual encounter appeared to be implicit in the invitations, the meetings took unexpected turns.

One of the activists lured to a meeting with Rogers described walking into the apartment. “And there’s two guys sitting there with her,” he said. The activist asked not to be identified because he feared that being publicly associated with an FBI investigation could cost him his job.

Rogers asked if he could find her an illegal gun to buy, the activist recalled. “I’m not going to sell one to you illegally,” the activist, a firearms enthusiast, told Rogers and her two companions. He then left.

Rogers invited over a second man, Gabriel Palcic, who was active in the tenants’ union that kept its paperwork at the Chinook Center. Like the first activist, Palcic entered the apartment to find two men with Rogers. They said their names were Mike and Omar. “Mike was missing his left leg from the knee down. Omar was kind of a Middle Eastern-looking guy with a big beard,” Palcic told me. “Both had tattoos. Both were very buff.”

Palcic said Mike and Omar claimed to be truckers who trafficked in illegal weapons. They told him they could get grenades, TNT, and AK-47s, and they asked if he wanted to buy anything.

Intrigued, Palcic met Mike and Omar several more times; during one encounter, they showed Palcic what they claimed was a fully automatic AK-47. “I never saw any grenades or TNT or any of that other shit they were talking about,” Palcic told me.

Palcic continued to hang around with Mike and Omar because they were generous, buying him meals, drinks, and cigars when they met.

“There were a few times where they were obviously pumping drinks into me,” Palcic remembered. “Yeah, do you want another double shot of that 16-year Scotch?”

But Palcic eventually told the two men he didn’t want any weapons and stopped returning their calls and text messages. Palcic has not been charged with a crime, according to publicly available court records.

Not long after, Armendariz Unzueta, the woman accused of assaulting a police officer with her bike, was granted access to the evidence in her case, which included police body-camera video from the day of the incident. Among the footage was the recording from Alamo’s body camera, which captured the officer flipping through the report filled with social media photos of activists.

Alamo’s body camera captured something else that day. In the recording, he mentioned that there were police officers secretly among the protesters at the housing march. He said there were two undercover cops and four plainclothes officers. He then looked at a photo on his phone.

“A picture of April, with her giant boobs,” Alamo said and laughed, apparently referring to one of the undercover officers in the crowd.

The activists at the Chinook Center watched the video. At the time, they didn’t know who April Rogers was. “There was a process of elimination,” Jon Christiansen said. “And then eventually we were able to triangulate that April Rogers was Chelsie.”

That’s when Rogers disappeared from the activist scene in Colorado Springs.



Protesters march down the street, demanding justice in the death of George Floyd and an end to police brutality on May 30, 2020, in Colorado Springs, Colo. Photo: Chancey Bush/The Gazette via AP

“Those Were, In Fact, Undercovers”

In the spring of 2022, while researching how the FBI’s 2020 investigation in Denver had expanded into Colorado Springs, I started contacting activists and gathering records there. At the same time, seemingly by coincidence, FBI agents took a renewed interest in the case, calling activists and knocking on doors. One of the activists they contacted was Autum Carter-Wallace. Her doorbell camera recorded agents coming to her home when she was away. One of the agents called her while outside her home.

“We came down to chat with you if you’re available,” the agent said in the voicemail. “I think it would be great to sit down with you and talk to you about some things that we are concerned about as it relates to things happening in the community.”

Carter-Wallace called the federal agent, who asked her about Palcic. She told the agent that she didn’t know him. The agent then told Carter-Wallace that the FBI had obtained video from a demonstration showing her standing next to Palcic.

“A protest with, like, a thousand people. I’m standing near one guy. You think I know him?” Carter-Wallace responded.

Agents also visited the home of one of the activists whom Rogers had tried to engage in an illegal firearms transaction. This activist agreed to meet with agents at the FBI’s office in Colorado Springs on the condition that he be allowed to record their conversation. The activist then provided me with a copy of that recording.

The agent on the recording confirmed the activist’s suspicions: that the two men with Rogers were undercover agents trying to entrap him in an illegal firearms transaction.

“You felt there was a gun-running conspiracy we were trying to throw at you, which those were, in fact, undercovers,” Brandon Kimble, the FBI agent, said during the recorded conversation. “However, they basically were in town to do a meeting with Gabe [Palcic] to sell him hand grenades.”

Last summer, after returning from a trip to England, Palcic was detained by agents at Denver International Airport. The agents provided him with copies of court-authorized search warrants that allowed for a tracking device to be installed on his truck and for his phone’s GPS data to be collected.

Palcic called me immediately after leaving the airport. “They basically recounted for me that they were looking into me, you know, because I inquired about acquiring weapons,” Palcic said. “And they said that, you know, they have recordings of all the conversations I had with the [undercovers] – which, obviously, you know?”

Palcic claimed that the agents told him the FBI was investigating the Chinook Center and the entire activist movement associated with the nonprofit.



April Rogers, claiming to be an activist named “Chelsie,” volunteered at the Chinook Center, where she had access to some records and email accounts. Photo courtesy of the Chinook Center.

“I Respectfully Decline to Answer”

In June 2022, I returned to Colorado Springs to attend a state criminal court hearing involving Charles Johnson, the activist arrested at the housing rights march. State prosecutors charged Johnson with theft, aggravated assault, and resisting arrest for his activities at various protests in the summer of 2020.

During the hearing, Johnson's lawyer, Alison Blackwell, called Rogers to testify over prosecutors' objections. Rogers entered the courtroom, this time wearing a long black wig and a black disposable face mask. A Justice Department lawyer, Timothy Jafek, sat at the prosecution table and spoke privately with Rogers before she took the witness stand.

The judge asked Rogers to take off her mask. She pulled it down to her chin.

"When you were marching in the housing march, were you doing that for the Colorado Springs Police Department?" Blackwell asked Rogers.

"I was, uh, under the authority of the FBI," Rogers answered meekly. She looked over at the Justice Department lawyer, her body rigid.

"OK. And how many other FBI agents were in that march?" Blackwell asked.

"I respectfully decline to answer," Rogers said, looking again at the Justice Department lawyer.

"Did you think my client was a terrorist threat at any point?"

"I respectfully decline to answer."

"You can just say no," Blackwell said, exasperated.

"I've been told to respond, 'I respectfully decline to answer,'" Rogers admitted.

Sitting in the courtroom, some of the activists from the Chinook Center snickered as this absurdity played out. The Justice Department, which was not a party to the case and had no authority in that courtroom, silenced a local cop on the witness stand as a state judge looked on from the bench. Jafek declined to comment as he left the courtroom that day.

“People have become more cautious, which is a shame because no one is doing anything illegal.”

The following month, as part of a deal to avoid jail time, Johnson pleaded guilty to a misdemeanor charge of obstructing a highway for his role in a June 2020 racial justice protest.

Meanwhile, Armendariz Unzueta, whose criminal

prosecution for pushing her bike down in a panic revealed the evidence that blew Rogers’s cover, is completing a deferred prosecution agreement. Under its terms, the felony charge against her will be dropped if she does 25 hours of community service and writes a letter of apology.

Shaun Walls, a Black activist who helped start the Chinook Center, said the FBI’s activity has had a chilling effect. “What they did has been effective,” Walls said. “People have become more cautious about what they’re doing, which is a shame because no one is doing anything illegal.”



Mourners gather outside Club Q to visit a memorial on Nov. 25, 2022, in Colorado Spring, Colo.
Photo: Parker Seibold/The Gazette via AP

“Something Went Boom”

A few months later, in November 2022, a Colorado man who ran a neo-Nazi website and had briefly been investigated by the FBI, at the same time federal agents were spying on the Chinook Center activists, committed a horrific crime.

Armed with AR-15-style rifle, Anderson Lee Aldrich killed five people and injured 25 others in a mass shooting at Club Q, a gay nightclub in Colorado Springs. An Army veteran at the club tackled Aldrich, preventing what would have otherwise been a much deadlier mass shooting. The attack made national news and drew comparisons to the

2016 mass shooting at Pulse, a gay nightclub in Orlando, Florida, where 49 people were killed and 53 wounded.

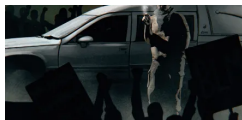
As with the killer in the [Pulse attack](#), the FBI had previously investigated the Club Q shooter. In the summer of 2021, after family members reported that he was building a bomb in a basement and had threatened to kill them, FBI agents [opened an investigation of Aldrich](#). They closed that inquiry less than a month later.

As the federal agents gave the future mass shooter a pass, the FBI, with the help of a pink-haired undercover cop, aggressively targeted local political activists seeking affordable housing and police accountability.

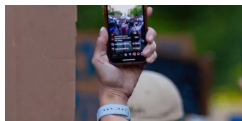
“We like to say our successes generally don’t make the news,” Kimble, the FBI agent who helped put together the failed gun-running stings against the Colorado Springs activists, said in the recorded conversation a few months before the Club Q shooting. “When we screw up, it’s because something went boom or there was a mass shooting.”

[Eleanor Knight](#) contributed research.

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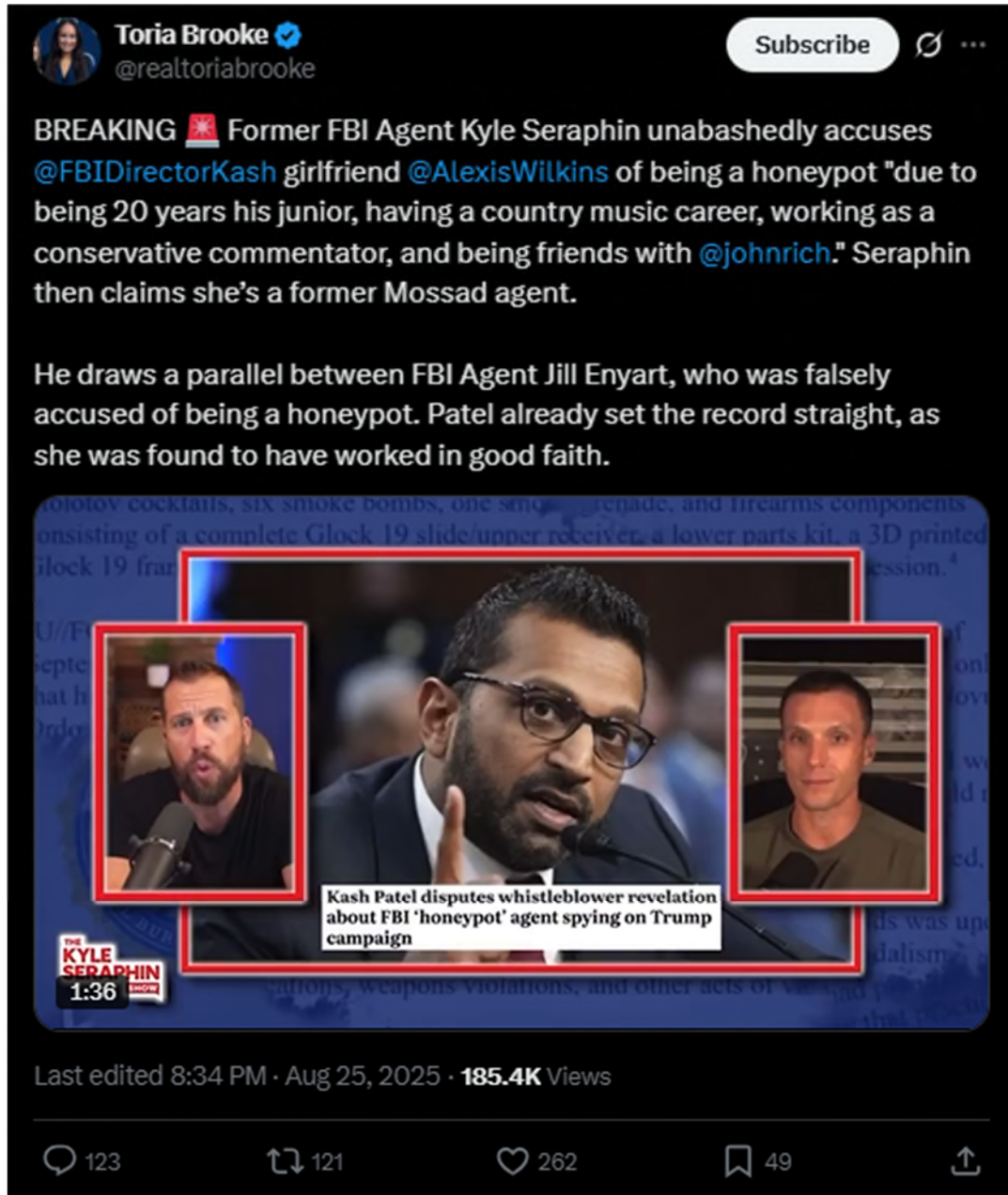
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EXHIBIT N

Exhibit N

Toria Brooke (@realToriaBrooke), X.com (Aug. 25, 2025, 8:34 P.M.),
<https://archive.ph/2025.08.30-165545/https://x.com/realtoriabrooke/status/1960153785923149874#selection-615.0-657.235>



**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ALEXIS WILKINS,

Plaintiff,

v.

KYLE M. SERAPHIN,

Defendant.

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Case No. 1:25-cv-1375

**PROPOSED ORDER GRANTING DEFENDANT KYLE M. SERAPHIN'S
MOTION TO DISMISS ORIGINAL COMPLAINT**

ON THIS DAY, came to be heard Defendant Kyle M. Seraphin's Motion to Dismiss Original Complaint ("Motion"). After reviewing the Motion, any response, any reply, the arguments of counsel, and all other things properly before the Court, the Court is of the opinion that the Motion should be **GRANTED** in its entirety.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED that Defendant Kyle M. Seraphin's Motion to Dismiss Original Complaint is hereby **GRANTED**.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Plaintiff Alexis Wilkins has failed to state a claim upon which relief may be granted.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Plaintiff Alexis Wilkins's claims against Defendant Kyle M. Seraphin are hereby dismissed with prejudice to their refiling.

All relief not expressly granted herein is hereby denied.

SIGNED on this _____ day of _____, 2025.

HONORABLE JUDGE PRESIDING