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11 **IN THE SUPERIOR COURT FOR THE STATE OF ALASKA**

12 **THIRD JUDICIAL DISTRICT AT ANCHORAGE**

13 RANDALL KOWALKE, )  
14 )  
15 Plaintiff, )  
16 )  
17 vs. )  
18 )  
19 DAVID EASTMAN, STATE OF )  
20 ALASKA, DIVISION OF ELECTIONS, )  
21 and GAIL FENUMIAI in her official )  
22 capacity as Director of Elections )  
23 Defendant. )  
24 )  
25 Case No. 3AN-22-07404 CI

26 **AFFIDAVIT OF MATTHEW KRINER**

27 STATE OF Georgia )  
28 Cobb ) ss.  
29 COUNTY )

30 MATTHEW KRINER, being first duly sworn upon oath, deposes and states  
31 as follows:  
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1           1.       I am over the age of 18 years and have personal knowledge  
2 of the statements contained this affidavit.

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4           2.       I am currently at Middlebury University's Center on Terrorism,  
5 Extremism and Counterterrorism (CTEC). The CTEC was founded in 2018 and  
6 conducts mixed-methods research on terrorism, other forms of extremism, and  
7 state sponsors of terrorism. As the Senior Research Scholar, I oversee research  
8 related to violent extremist movements and efforts to destabilize democratic  
9 governments. I have held this position since October 2021.  
10

11           3.       For over ten years I have studied the dynamics of terrorist  
12 organizations, anti-government extremists, and individual radicalization. Prior to  
13 my work at CTEC, I was a contracted intelligence analyst through Thomson  
14 Reuters Special Services that supported the U.S. government's law enforcement  
15 missions at the Department of Homeland Security (DHS) and the Department of  
16 Justice (DOJ). In that capacity I contributed to DOJ investigations into violent  
17 threats leading into and after the January 6<sup>th</sup>, 2021 Insurrection. I held this  
18 position from September 2019 – October 2021.  
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21           4.       Attached to this affidavit are my resume and list of publications,  
22 labeled Exhibit 1.  
23

24           5.       I have studied the Oath Keepers. That group portrays itself as  
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1 “guardians of the republic”<sup>1</sup> but my research shows that it is actively seeking to  
2 undermine the U.S. Government. For example, Oath Keepers was a very active  
3 participant in the January 6<sup>th</sup>, 2021, interference with the peaceful transfer of  
4 power and attack on the U.S. Capitol. Its core leadership is now under federal  
5 indictment<sup>2</sup> for seditious conspiracy.<sup>3</sup>

6  
7 6. The Oath Keepers have openly advocated the forceful overthrow of the  
8 U.S. Government under various circumstances.<sup>4</sup> My research shows that the Oath  
9 Keepers are not the “guardians of the republic” that they purport to be in their  
10 recruitment drives and on their website. Instead, they have weaponized “patriotism”  
11 in an effort to subvert American democracy.<sup>5</sup> Moreover, since 2016, the Oath  
12 Keepers have been in an openly antagonistic and conspiratorial stance against the  
13 United States government, stating that “we aren’t getting through this [President  
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19 <sup>1</sup> Matthew Kriner, Jon Lewis, The Oath Keepers and Their Role in the January 6  
20 Insurrection, Combating Terrorism Center Sentinel, (December 2021),  
<https://ctc.westpoint.edu/the-oath-keepers-and-their-role-in-the-january-6-insurrection/>.

21 <sup>2</sup> Department of Justice, Leader of Oath Keepers and 10 Other Individuals Indicted in  
22 Federal Court for Seditious Conspiracy and Other Offenses Related to U.S. Capitol Breach,  
23 Justice News (January 13, 2022), [https://www.justice.gov/opa/pr/leader-oath-keepers-and-10-](https://www.justice.gov/opa/pr/leader-oath-keepers-and-10-other-individuals-indicted-federal-court-seditious-conspiracy-and)  
[other-individuals-indicted-federal-court-seditious-conspiracy-and](https://www.justice.gov/opa/pr/leader-oath-keepers-and-10-other-individuals-indicted-federal-court-seditious-conspiracy-and).

24 <sup>3</sup> 18 U.S.C. § 2384 (defining seditious conspiracy).

25 <sup>4</sup> Kriner and Lewis, *supra* note 1.

26 <sup>5</sup> Sam Jackson, Oath Keepers leader indictment just the tip of a scary iceberg, Think:  
27 Opinion, Analysis, Essays (Jan. 17, 2022), [https://www.nbcnews.com/think/opinion/oath-](https://www.nbcnews.com/think/opinion/oath-keepers-leader-indictment-just-tip-scary-iceberg-ncna1287555)  
28 [keepers-leader-indictment-just-tip-scary-iceberg-ncna1287555](https://www.nbcnews.com/think/opinion/oath-keepers-leader-indictment-just-tip-scary-iceberg-ncna1287555).

1 Biden's election] without a civil war. Too late for that. Prepare you[r] mind, body,  
2 spirit.”<sup>6</sup>

3  
4 8. This is nothing new. Historically, the Oath Keepers has routinely  
5 espoused anti-government rhetoric and stood openly against federal law  
6 enforcement with firearms.<sup>7</sup> From their involvement in the 2014 Bundy Ranch  
7 standoff with United States federal law enforcement, to their acting as perimeter  
8 defense for the occupiers of the federally owned Malheur Natural Refuge in 2016<sup>8</sup>,  
9 and ultimately their alleged role in the January 6<sup>th</sup> Insurrection, the Oath Keepers  
10 have made clear through their actions that they are willing and able to use force  
11 against the United States government when they believe it has acted against their  
12 wishes.  
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15 9. Threatening force for political and ideological purposes is clearly in line  
16 with the DOJ definition of terrorism: “Violent, criminal acts committed by  
17 individuals and/or groups to further ideological goals stemming from domestic  
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23 <sup>6</sup> *United States of America v. Elmer Stewart Rhodes III, et. al*, Indictment (D.D.C. Jan.  
24 12, 2022), available at <https://www.justice.gov/opa/press-release/file/1462481/download>.

25 <sup>7</sup> Sam Jackson, Oath Keepers: Patriotism and the Edge of Violence in a Right-Wing  
26 Antigovernment Group (Columbia University Press) (2020).

27 <sup>8</sup> Amanda Peacher, There's Another Armed Group in Burns And It's Not The Bundys,  
28 Oregon Public Broadcasting (Jan. 10, 2016), <https://www.opb.org/news/series/burns-oregon-standoff-bundy-militia-news-updates/theres-another-armed-group-in-burns-and-theyre-not-the-bundys/>; Jackson, *supra* note 7.

1 influences, such as those of a political, religious, social, racial, or environmental  
2 nature.”<sup>9</sup>

3  
4 10. Mr. Eastman admits he is registered as a lifelong member of Oath  
5 Keepers. As a matter of fact, he has refused to recant his membership in the  
6 organization and defended his presence at the January 6<sup>th</sup> Insurrection<sup>10</sup> by  
7 asserting conspiracy theories that the illegal activity of the day was carried out by  
8 “antifa” or antifascist activists. These assertion are demonstrably false. It is  
9 important to note that the Oath Keepers made it clear, before January 6, that  
10 violence was not only planned, but in their estimation justified. On an episode of  
11 Infowars, hosted by conspiracy theorist Alex Jones on November 10, 2020, Oath  
12 Keepers’ leader stated that “he advocated for Trump to ‘invoke the Insurrection act  
13 ... to suppress the deep state,’ claiming that the Oath Keepers had ‘men already  
14 stationed outside DC as a nuclear option. In case they attempt to remove the  
15 President illegally, we will step in and stop it. We’re gonna be there to also help  
16 secure the coming rally this Saturday and your caravan coming in’ and ‘We will be  
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21 <sup>9</sup> Department of Justice, Domestic Terrorism: Definitions, Terminology, and  
22 Methodology, Federal Bureau of Investigation (Nov. 2020), [https://www.fbi.gov/file-](https://www.fbi.gov/file-repository/fbi-dhs-domestic-terrorism-definitions-terminology-methodology.pdf/view)  
23 [repository/fbi-dhs-domestic-terrorism-definitions-terminology-methodology.pdf/view](https://www.fbi.gov/file-repository/fbi-dhs-domestic-terrorism-definitions-terminology-methodology.pdf/view).

24 <sup>10</sup> Michelle Theriault Boots, Wasilla lawmaker who attended D.C. Trump rally pushes  
25 debunked theory Antifa was responsible for storming US Capitol, Anchorage Daily News  
26 (January 7, 2021), [https://www.adn.com/alaska-news/2021/01/07/alaska-state-legislator-who-](https://www.adn.com/alaska-news/2021/01/07/alaska-state-legislator-who-attended-dc-trump-rally-pushes-debunked-theory-antifa-was-responsible-for-storming-us-capitol/)  
27 [attended-dc-trump-rally-pushes-debunked-theory-antifa-was-responsible-for-storming-us-](https://www.adn.com/alaska-news/2021/01/07/alaska-state-legislator-who-attended-dc-trump-rally-pushes-debunked-theory-antifa-was-responsible-for-storming-us-capitol/)  
28 [capitol/](https://www.adn.com/alaska-news/2021/01/07/alaska-state-legislator-who-attended-dc-trump-rally-pushes-debunked-theory-antifa-was-responsible-for-storming-us-capitol/); James Brooks, Leaked list shows Alaska state Rep. David Eastman is a ‘lifetime  
member’ of a leading Capitol-riot group, Anchorage Daily News (October 20, 2021),  
[https://www.adn.com/politics/2021/10/20/leaked-list-shows-alaska-state-rep-david-eastman-is-](https://www.adn.com/politics/2021/10/20/leaked-list-shows-alaska-state-rep-david-eastman-is-a-lifetime-member-of-a-leading-capitol-riot-group/)  
[a-lifetime-member-of-a-leading-capitol-riot-group/](https://www.adn.com/politics/2021/10/20/leaked-list-shows-alaska-state-rep-david-eastman-is-a-lifetime-member-of-a-leading-capitol-riot-group/).


1 inside DC and we'll be on the outside of DC, armed, if the President calls us up' and  
2 'if we don't there will be no more republic.' ”<sup>11</sup>

3  
4  
5 END OF AFFIDAVIT.

6 DATED this 29 th day of August 2022 at Marietta,  
7 Georgia.

8  
9  
10   
11 MATTHEW KRINER

12  
13 SUBSCRIBED AND SWORN TO before me on this 29 day of  
14 August, 2022 at Marietta, Georgia.

15   
16 Notary Public for the State of GA.  
17 My commission expires 2/9/2024



<sup>11</sup> Kriner and Lewis, *supra* note 1; Joseph Choi, Raffensperger: Trump request to 'find' votes was a threat, The Hill (Nov. 2, 2021), <https://thehill.com/homenews/state-watch/579679-raffensperger-trump-request-to-find-votes-was-a-threat>.

# MATTHEW S. KRINER

## Research & Analysis Experience

### **Managing Director, Accelerationism Research Consortium (ARC)**

December 2021 – Present

- Manage the Accelerationism Research Consortium.
- Oversee Research Fellow and working group research products and strategic engagements with external partners.

### **Senior Research Scholar, Center on Terrorism, Extremism, and Counterterrorism (CTEC)**

Washington, DC, October 2021 – Present

- Manage the Accelerationism Threat Assessment and Radicalization Initiative research program.
- Serve as subject matter expert on accelerationism, far-right extremism, and more for tech sector engagements.
- Design and edit CTEC media publications and research reports.
- Coordinate data acquisition, management, and stewardship.

### **Intelligence Analyst, Thomson Reuters Special Services**

Washington, DC, September 2019 – October 2021

- Led a task force supporting FBI on the January 6<sup>th</sup> Insurrection, leveraging proprietary data sources and OSINT techniques to investigate suspects and leads provided by the client.
- Produced a white paper, and briefed, on Boogaloo movement for US government law enforcement agencies.
- Developed client outreach program for domestic extremism capabilities.
- Designed a research program to parse lexical threat indicators in extremist forums and dialogue using natural language processing and machine learning applications.
- Designed an innovative risk terrain modeling and risk indicator analytical program for US domestic extremist activity.
- Designed analytical training programs for social listening, physical threat assessments, forensic video analysis, and social media analysis using proprietary and open-source tools.
- Served as liaison for US government law enforcement agencies including FBI, DOJ, DHS, and DOD.
- Regularly produced reports and briefings tailored to US government law enforcement and commercial clients on criminal and violent extremist activity.
- Coordinated and vetted third party data provider partnerships.

### **Senior Intelligence Analyst/Program Manager, Control Risks – Embed at Uber’s Global Security Operations Center**

Washington, DC, November 2018 – September 2019

- Led team of 15 analysts using open and proprietary sources to conduct data-driven analysis on the impact of active and emerging threats to Uber’s operations, Executive Team, marketplaces, research & development division, and more.
- Refined open-source intelligence training protocols as well as database entry and maintenance best practices.
- Overhauled Uber’s risk indicator regimes within proprietary platforms and tools and provided strategic and technical guidance on data visualization of trends.
- Oversaw analytical projects and reports related to emerging geopolitical developments that could impact Uber’s global operations, including state actors (e.g., China), disease outbreaks, political discourse of opposition political movements, and more.
- Led task force dedicated to utilizing social listening tools to monitor real-time public discourse and demonstrations directed at Uber’s IPO pre-launch road show.
- Coordinated an initiative across teams and areas of business to streamline incident response resources.
- Triaged incident-specific alerts and coordination of rapid turnaround incident notifications.
- Responsible for composing daily, weekly, and monthly security reports and briefing client security senior leadership concerning applicable global security developments.

### **Research Fellow, Valens Global**

Washington, DC, February 2018 – September 2018

- Drafted threat assessments and open-source intelligence reports on foreign terrorist fighters and domestic extremist movements for Federal Government clients and Non-Profits, such as the ADL.
- Drafted research papers on topics such as applications of artificial intelligence and machine learning in national security environments.
- Collected, mapped, and coded global jihadist organizations for machine learning research initiative on behalf of the Office of Naval Research.

- Conducted open-source research and analysis pertaining to extremist movements, hate groups, and foreign terrorist organizations' activities and actions globally.
- Designed research proposal for monitoring and evaluation of state-led disinformation campaigns on general populaces, as well as targeted influence campaigns on domestic extremist movements.

**Graduate Research Assistant, Reichman University (Formerly, IDC Herzliya)**

Herzliya, IL, October 2016 – February 2018

- Conducted original CVE research on activities within the Israeli settler population's far-right extremist organizations and networks.
- Identified informal networks across the Israeli settler community and the Israeli government for advisor's book.
- Contributed to and edited manuscripts for submission to journals, academic workshops, and conference presentations.
- Coordinated academic workshop on radicalization at the International Center for Counter-Terrorism's (ICT) annual conference.

**Director of Political Affairs, Consulate General of Israel**

Atlanta, GA June 2012 – January 2014

- Advised Consul General on developing trends within U.S. national, regional and local politics.
- Served as primary liaison for six Southern states' government and law enforcement agencies.
- Briefed U.S. Congressional officials, and state and federal law enforcement agents throughout the Southeast on Israel's contemporary military and political challenges; including but not limited to Iran's nuclear capability, sanctions evasions, state-sponsored terrorist organizations, and more.
- Facilitated bilateral international cooperation between U.S.-based non-profits, federal, state, and local governments and their Israeli counterparts.
- Hired and managed a rotating team of research interns.

**Education**

**MA in Government: Counterterrorism & Homeland Security, Reichman University (Formerly IDC Herzliya) (2018)**

- Program was a PhD prep track with heavy focus on qualitative and quantitative research design and modeling.
- Conducted extensive research on the role of emotional mechanisms in radicalization, particularly in respect to organizational narratives used for recruitment, culminating in a publication with *Perspectives on Terrorism*.
- Thesis research used unique survey data and a dual mediation model via SPSS and Stata to evaluate the effect of perceived threats on anti-democratic sentiments within Israeli settler community.

**BA in International Affairs: Diplomatic & International Service, Kennesaw State University (2012)**

- Focus on geopolitical security and history

**Publications & Media Appearances**

- The Weaponization of Conspiracy Theories: A Growing National Security Threat, January 6<sup>th</sup> Select Committee, July 2022, [https://www.middlebury.edu/institute/sites/www.middlebury.edu.institute/files/2022-07/Center%20on%20Terrorism%2C%20Extremism%2C%20and%20Counterterrorism%20-%20Statement%20for%20the%20Record\\_0.pdf?fv=90gEQB1](https://www.middlebury.edu/institute/sites/www.middlebury.edu.institute/files/2022-07/Center%20on%20Terrorism%2C%20Extremism%2C%20and%20Counterterrorism%20-%20Statement%20for%20the%20Record_0.pdf?fv=90gEQB1)
- Toppling Tyranny: Understanding the Militia Movement's Role in the January 6<sup>th</sup> Insurrection and Beyond, January 6<sup>th</sup> Select Committee, July 2022, <https://www.middlebury.edu/institute/sites/www.middlebury.edu.institute/files/2022-07/Understanding%20the%20Militia%20Movement%27s%20Role%20in%20J6.pdf?fv=Kmf2uzRZ>
- Militant Accelerationist Coalitions: A Case Study in Neo-Fascist Accelerationist Coalition Building Online, ARC, July 2022, [https://www.middlebury.edu/institute/sites/www.middlebury.edu.institute/files/2022-06/REDACTED%20CTEC\\_TAT%20Accelerationism%20Report%20.pdf?fv=zvPnbbzC](https://www.middlebury.edu/institute/sites/www.middlebury.edu.institute/files/2022-06/REDACTED%20CTEC_TAT%20Accelerationism%20Report%20.pdf?fv=zvPnbbzC)
- The Diagon Movement And Militant Accelerationism, ARC, June 2022, <https://www.accresearch.org/reports-1/the-diagon-movement-and-militant-accelerationism>
- An Introduction to Militant Accelerationism, ARC, May 2022, <https://www.accresearch.org/shortanalysis/an-introduction-to-militant-accelerationism>
- Understanding Accelerationist Narratives: The Great Replacement Theory, GNET Insights, May 2022, <https://gnet-research.org/2022/05/30/understanding-accelerationist-narratives-the-great-replacement-theory/>
- Understanding Accelerationist Narratives: The Boogaloo, GNET Insights, November 2021, <https://gnet-research.org/2021/11/18/understanding-accelerationist-narratives-the-boogaloo/>
- Understanding Accelerationist Narratives: 'There Is No Political Solution', GNET Insights, September 2021, <https://gnet-research.org/2021/09/02/understanding-accelerationist-narratives-there-is-no-political-solution/>
- Pride & Prejudice: The Violent Evolution of the Proud Boys, CTC Sentinel, July 2021, <https://ctc.usma.edu/pride-prejudice-the-violent-evolution-of-the-proud-boys/>
- The Evolution of the Boogaloo Movement, CTC Sentinel, February 2021, <https://ctc.usma.edu/the-evolution-of-the-boogaloo-movement/>

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<https://www.universiteitleiden.nl/binaries/content/assets/customsites/perspectives-on-terrorism/2018/2018-02/02-tackling-terrorisms-taboo-shame---matthew-kriner.pdf>
- Islamic State and Al Qaeda Battle for Preeminence, RealClearDefense, June 2016,  
[https://www.realcleardefense.com/articles/2016/06/09/islamic\\_state\\_and\\_al-qaeda\\_battle\\_for\\_preeminence\\_109430.html](https://www.realcleardefense.com/articles/2016/06/09/islamic_state_and_al-qaeda_battle_for_preeminence_109430.html)