

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GUIFFRE,

Plaintiff,

-against-

GHISLAINE MAXWELL,

Defendant.
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Case No.: 15-cv-7433 (RWS)

**DECLARATION OF MICHAEL CERNOVICH IN SUPPORT OF PROPOSED
INTERVENOR MICHAEL CERNOVICH D/B/A CERNOVICH MEDIA'S
MOTION TO INTERVENE AND UNSEAL**

I, Michael Cernovich, declare:

1. I am over the age of 18 years and am fully competent to make this Declaration.

The facts set forth herein are within my personal knowledge and are true and correct.

2. I respectfully submit this Declaration in support of my Motion to Intervene and Unseal, filed herewith.

3. Among other professions and hobbies, I am a lawyer, author, documentary filmmaker, author, and host of the Mike Cernovich Podcast.

4. My broadcasts on Periscope have over 63,000 subscribers and 13 million “likes”. The broadcasts are watched by tens-of-thousands of people per episode. My Periscope coverage of the Republican National Convention and Democrat National Convention was featured on Periscope’s main page and served as one of the only real-time sources of information from those conventions.

5. My photographs and videos are frequently relied upon and utilized by national media outlets.

6. Online, I usually publish under the brand “Cernovich Media.”

7. I am also directing and producing a documentary film on modern media coverage.


8. I regularly use Twitter as a platform to report on news and provide opinions on current events. Currently, I have over 192,000 Twitter followers, and my tweets reach millions of people on a monthly basis.

9. I have been closely following this instant lawsuit, and I have reported on it online.

10. My coverage of this lawsuit on Twitter and elsewhere has contributed to informing the public about the issues at stake in this case, including the involvement of public figures and government officials.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 19, 2017.

DocuSigned by:

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Michael Cernovich