

FILED

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IN THE CLARK COUNTY MUNICIPAL COURT

SHEILA E. RICE, CLERK

MUNICIPAL COURT
BY *[Signature]* DEPUTY

In re: Criminal Charges Against
Donald J. Trump and James David ("JD")
Vance

Case No. 24SPM100

Judge (*en banc*)

**SUPPLEMENTAL AFFIDAVIT OF GUERLINE JOZEF SUPPORTING CRIMINAL CHARGES AGAINST
DONALD J. TRUMP AND JD VANCE**

I, Guerline Jozef, being duly sworn according to law, testify as follows on behalf of the Haitian Bridge Alliance, Inc.:

1. I am a private citizen over the age of 18. I have personal knowledge of and am competent to testify regarding the matters discussed below. I incorporate the facts stated in my previous, amended affidavit of September 26, 2024, filed on September 30, 2024. I submit this affidavit to supplement my previous testimony with additional information I have learned.

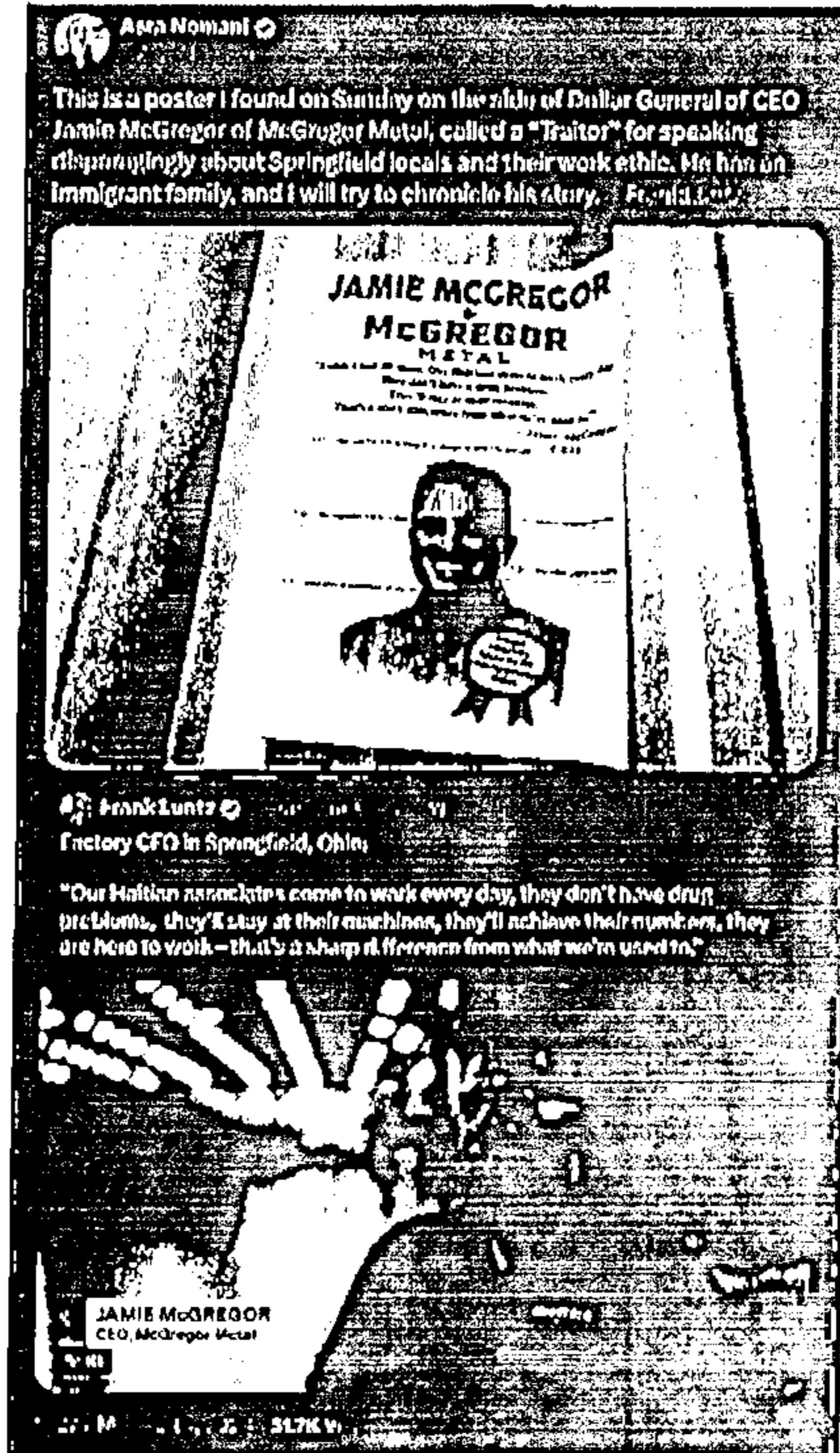
ADDITIONAL FACTS

2. In early September, Trump and JD Vance began their campaign of lies against Haitian immigrants, punctuated most notably by Trump's comments during the September 10 presidential debate. Since then, residents in Springfield have continued to face violent threats, harassment, and intimidation.

Miriam Jordan, *An Ohio Businessman Faces Death Threats for Praising His Haitian Workers*, N.Y. TIMES (Sept. 30, 2024), <https://www.nytimes.com/2024/09/30/us/springfield-ohio-haitians-threats.html> (cataloguing much of the continuing threats in the Springfield community, especially those to residents who support their Haitian neighbors).

2. Jamie McGregor is a Springfield resident and local business owner, operating McGregor Metals and employing many Haitian immigrants as machine operators, forklift drivers, and quality inspectors. Haitians make up an estimated 10% of his company's workforce.
3. Since Trump's September 10-debate lies, McGregor and his family have been the target of anti-immigrant sentiment and violence. Death threats have come in, targeting both McGregor and his family, and forcing them to lockdown their business.
4. On September 12, federal law enforcement warned McGregor that some of the threats against him were credible and encouraged him to take precautions for his family's safety.

5. The reason for the vitriol against McGregor is clear. On September 18, 2024, a social-media user on X posted images of posters found in Springfield featuring McGregor's face and labeling him a "traitor" for his hiring of Haitian immigrants.

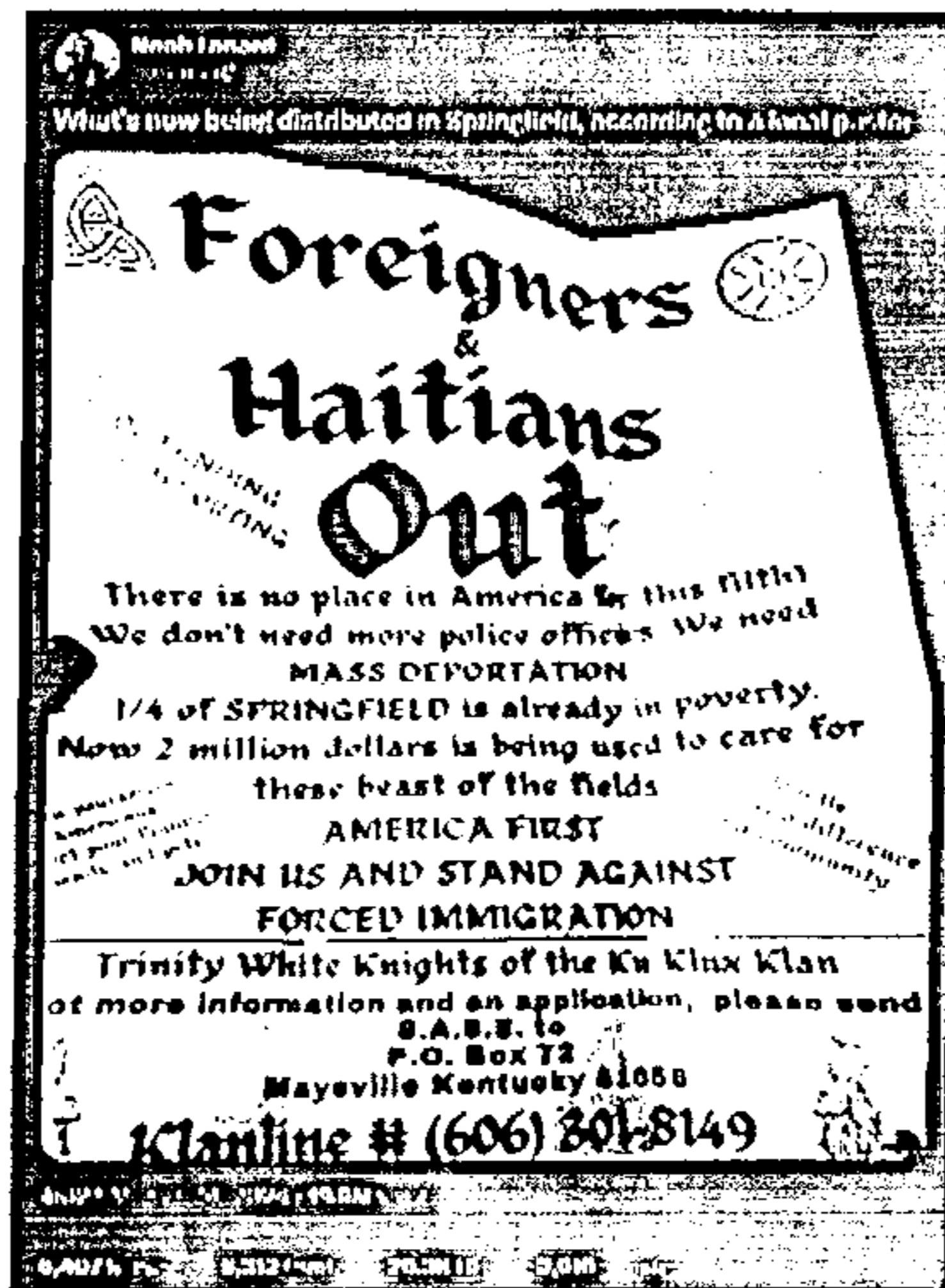


6. Soon after, McGregor's company received voicemails echoing the claims made by Trump and Vance, with one caller asking, "why are you importing Third World savages who eat animals and giving them jobs over United States citizens?"
7. Trump's and Vance's lies have similarly inspired direct calls for McGregor's death, such as a voicemail stating, "the owner of McGregor Metal can take a bullet to the skull and that would be 100 percent justified."

Miriam Jordan, *An Ohio Businessman Faces Death Threats for Praising His Haitian Workers*, N.Y. TIMES (Sept. 30, 2024), <https://www.nytimes.com/2024/09/30/us/springfield-ohio-haitians-threats.html> (detailing interview with McGregor, the effects on his family, and the

threats he has received); @AsraNomani, X (Sept. 18, 2024, 11:37 AM), <https://x.com/AsraNomani/status/1836429441423057138> (directing to the X post pictured above)

8. Since Trump's September 10-debate lies, hate groups have converged on Springfield, emboldened by Trump's and Vance's legitimizing of anti-Black sentiment, with the intent of terrorizing Haitians immigrants and their supporters.
9. Neo-Nazis have been drawn to and have amplified Trump's and Vance's false claims. On September 28th, neo-Nazis gathered in front of Mayor Rue's home waving swastika flags.
10. The Klu Klux Klan and the Proud Boys have similarly answered Trump's and Vance's call, seeking to harass and intimidate Haitians in Springfield and those who support them. On September 14, social media users on X shared images of flyers distributed throughout Springfield by the Klu Klux Klan. The flyers directly echo Trump's call to forcibly deport Haitians legally residing in Springfield and his baseless claim of Haitians bringing diseases to the city.



Sydney Dawes, *Hate groups converge on Springfield after false claims about Haitian immigrants*, *SPRINGFIELD NEWS-SUN* (Oct. 1, 2024), <https://www.springfieldnewssun.com/local/hate-groups-converge-on-springfield-following-false-claims-about-haitian-immigrants/R6BSUOAMGZDNZNSV4PUTBDPOSY/> (documenting the various hate groups that have been active in Springfield since Trump and Vance began spreading their lies).

@nlanard, X (Sept. 14, 2024, 4:02 AM), <https://x.com/nlanard/status/1835046358488666458> (directing to the X post pictured above); Odette Yousef, *In parroting a lie about migrants in Ohio, Trump excited extremists*, NAT'L PUB. RADIO (Sept. 24, 2024), <https://www.npr.org/2024/09/24/nx-s1-5118438/neo-nazi-haitian-springfield-trump-debate> (documenting the various hate groups, including the Proud Boys, active in Springfield since Trump and Vance began spreading their lies.)

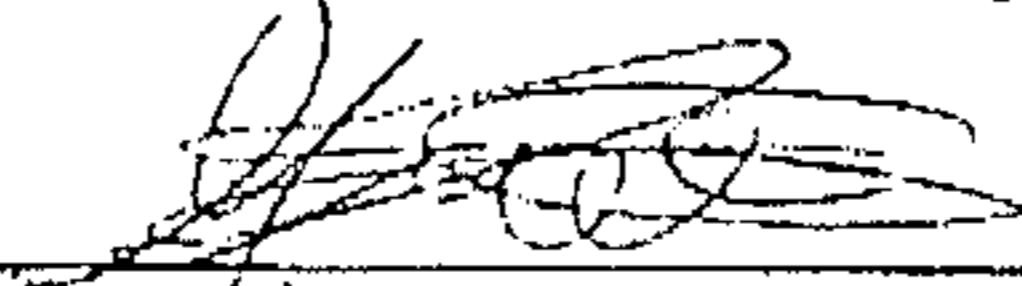
11. In the face of Trump's and Vance's pressure campaign against Springfield and the growing danger to all city residents, Governor DeWine has expressed frustration about the futility of appealing to Trump and Vance to change their conduct, saying in a September 30 interview "[i]t's clear nothing I would say would alter" their conduct. He noted Trump's misconduct during the debate: "I just started shaking my head," DeWine recalled. "And then he kept on it!" Later in the interview, Governor DeWine was asked about the comments made by Trump and Vance and said, "their comments are just hurtful, they're hurtful to a lot of people . . ." "'To say that these people are illegal is just not right[;] you can't make up stuff like that," he also said. As JD Vance, his fellow Republican and Senator from Ohio continued to insist that his lie about eating pets was true and to falsely call the Haitians "illegal aliens," DeWine grew "just more infuriated." "Yeah, after a while, because it got cumulative, and then you keep thinking, 'Well, they're going to stop this,'" he said. "Well, they didn't stop this, they just keep going." The governor had to send in state troopers to help Springfield, an enormous economic cost.

Jonathan Martin, *Just Not Right': A GOP Governor Confronts Trump's Lies*, POLITICO (Sept. 30, 2024), <https://www.politico.com/news/magazine/2024/09/30/dewine-ohio-gop-governor-confronts-trump-lies-00181595> (interviewing Governor DeWine and containing the quotes referenced above).

12. During the October 1, 2024 vice-presidential debate hosted by CBS News, JD Vance *again* falsely insisted that Haitians in Springfield are there illegally when he *knows* they are there with the permission of the U.S. government under legal status, using legal procedures. For political gain and recklessly disregarding the consequences for Haitian immigrants and Springfield as a whole, he claimed that Vice President Harris had waved a "wand" to allow the immigrants in, when he *knows* she had nothing personally to do with it. The CBS News moderators had to fact-check Vance. Just like his earlier admission to Dana Bash that he and trump have to "create stories" about Haitians for media attention, Vance admitted on stage that he was lying when he protested, "The rules were that you guys weren't going to fact check!"
13. The video of the debate is widely available on the internet.
14. Vance insists on lying about Haitians' legal status when he knows the truth and the effect of his lies on Springfield—and even when the governor of the state he represents says the immigrants are here legally and pleads for Vance and Trump to *stop*.
15. These additional facts show both the harm and Trump and Vance have knowingly inflicted and their persistence even when they know the truth.

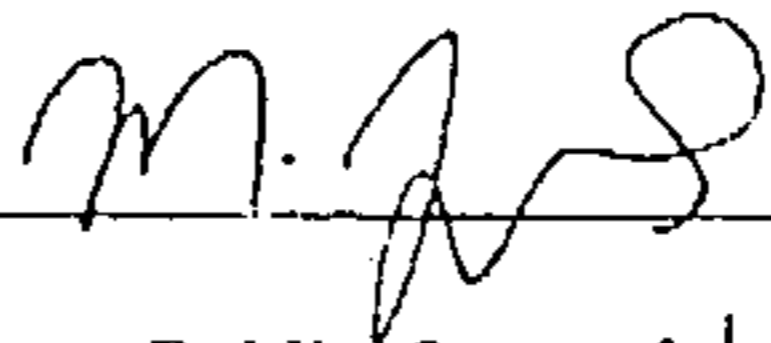
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I affirm the above to be true to the best of my knowledge under penalty of perjury.



 Guerlin Jozef
 Co-Founder and Executive Director
 Haitian Bridge Alliance, Inc.

Sworn to and subscribed before me this 2 day of October, 2024.



 Notary Public, State of Washington DC
 My commission expires: 06/14/2029

