

# Exhibit G

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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THE PEOPLE OF THE STATE OF NEW YORK, by  
LETITIA JAMES, Attorney General of the  
State of New York,

Index No. 453196/2022

(Kraus, J.S.C.)

-against-

Petitioner,

**[PROPOSED] ORDER OF  
REFERENCE,  
PRODUCTION, AND  
REDACTION PROTOCOL**

VDARE FOUNDATION, INC.,

Respondent.

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**[PROPOSED] ORDER OF REFERENCE, PRODUCTION, AND REDACTION  
PROTOCOL**

In furtherance of this Court’s Orders of January 23, 2023 (NYSCEF Doc. No. 62), and December 11, 2023, as amended (NYSCEF Doc. No. 129), and in resolution of Mot. Seq. No. 6, seeking redaction of documents to protect the personal identifying information of the moving Pseudonymous Authors, the Court hereby adopts the following redaction protocol and orders as follows:

1. As used herein:
  - a) “Pseudonymous Author” shall mean any writer who has published under a pseudonym or anonymously works at vdare.com or received payment from VDARE Foundation, Inc. for their written work.
  - b) “Qualifying Pseudonymous Author” shall mean any Pseudonymous Author who has provided, individually or through counsel, a sworn statement (or certification under penalty of perjury) representing that they are not a “Related Party” as that term is defined in N-PCL § 102(23).<sup>1</sup>

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<sup>1</sup> “Related party” shall mean (i) any director, officer or key person of VDARE Foundation, Inc. or any affiliate of VDARE Foundation, Inc.; (ii) any relative of any individual described in clause (i) of this subparagraph; or (iii) any entity in which any individual described in clauses (i) and (ii) of this subparagraph has a thirty-five percent or

2. Pursuant to CPLR 3104, 4011, 4201, and 4311, the Court hereby appoints \_\_\_\_\_ (the “Referee”) as a special referee to supervise production of documents pursuant to the Attorney General’s Subpoena and the Court’s prior orders.
3. VDARE Foundation, Inc. shall immediately produce all responsive documents to the Referee to make redaction determinations, apply redactions to responsive documents, and prepare corresponding redaction logs. All redaction determinations and corresponding logging shall be done by the Referee, with the cost of the Referee to be borne solely by VDARE Foundation, Inc.
4. The Referee shall redact any information that reveals the identities of Qualifying Pseudonymous Authors (e.g., name, address, social security number or other identifying number or code, telephone number, email address). All other information regarding transactions between VDARE Foundation, Inc. and the Qualifying Pseudonymous Author (such as, without limitation, payment records, contracts, terms of the transactions and corresponding communications), shall be produced by the Referee to the Attorney General without redaction.
5. All redactions shall be reflected in a redaction log that identifies the basis for the redaction and, where applicable, the identity by pseudonym of the author who is counterparty to the transaction.
6. The terms of this protocol will apply to all responsive documents, including those previously produced in redacted form.
7. The Petitioner may seek disclosure of identifying information for the Pseudonymous

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greater ownership or beneficial interest or, in the case of a partnership or professional corporation, a direct or indirect ownership interest in excess of five percent. N-PCL § 102(23)

Authors where it deems it necessary to Petitioner's investigation. If the Petitioner demands that disclosure, the Petitioner will provide notice to VDARE Foundation, Inc., and the intervening Movants in writing by email, who may oppose the same.

SO ORDERED, this \_ day of \_\_\_\_\_, 2024.

ENTER:

\_\_\_\_\_  
J.S.C.