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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR KING COUNTY

UNITED FEDERATION OF CHURCHES,  
LLC (dba "THE SATANIC TEMPLE")

Plaintiff/Counterclaim  
Defendant,

v.

DAVID ALAN JOHNSON (AKA "ADJ"),  
LEAH FISHBAUGH, MICKEY MEEHAN,  
and NATHAN SULLIVAN,

Defendants/  
Counterclaimants

No. 23-2-06120-9 SEA

**DECLARATION OF MICKEY  
POWELL IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

I, Mickey Powell declare as follows:

1. I am the Defendant in above captioned lawsuit who is listed as "Mickey Meehan." My legal name is Mickey Powell. I am over the age of eighteen and am otherwise competent to testify. If called upon to testify on the matters herein, I would do so consistently with this declaration.

2. I am a former member of an autonomous chapter of The Satanic Temple that was originally called The Satanic Temple – Seattle. On January 1, 2020, the chapter changed

1 its name to The Satanic Temple-Washington. For purposes of this declaration, I will refer to  
2 the chapter as the “Washington Chapter.”

3 3. At the time I joined the Chapter and through the time of the actions alleged  
4 against me, I was using the pseudonym Lenore Calavera with my interactions with the  
5 Washington Chapter.

6 4. At all times that I was a member of the Washington Chapter, the Washington  
7 Chapter held out its Chapter Head and Media Liaison as the leaders of the Washington  
8 Chapter who had authority to make decisions for the Washington Chapter.

9 5. In the fall of 2019, the Washington Chapter took control of a Facebook page  
10 that had been created and used by a group called the South Sound Satanists.

11 6. In December of 2019, as the Washington Chapter was trying to decide what  
12 to do with the South Sound Satanists’ page, the Washington Chapter gave me editing access  
13 to the page along with my co-defendant, David Johnson.

14 7. At David Johnson’s suggestion, the Chapter Head, Leah Garvais (who uses  
15 the pseudonym Siri Sanguine) agreed that the page should be used as a “memes” page, to  
16 focus on short-form humor and provocative images using funny “memes” from places like  
17 Twitter and Tumblr. The intent was for the memes page to have a light, comedic, and ironic  
18 tone. Because of this agreed upon purpose, the page was referred to as the “Memes Page.”

19 8. On January 1, 2020, the Washington Chapter gave me and co-defendant David  
20 Johnson administrative (“admin”) control of the Memes Page.

21 9. Although the Memes Page was intended for the purpose of posting funny  
22 memes, in early January Washington Chapter’s Chapter Head, Garvais/Siri Sanguine  
23 accidentally renamed the page “TST-WA Allies.” This was a mistake. Garvais/Siri Sanguine  
24 had meant to make that change for the former South Sound Satanist’s Facebook *group*, not  
25 their Facebook *page*, which was intended to be a memes page.  
26

1           10.     On March 14, 2020, to my shock, Garvais/Siri Sanguine sent an email to me  
2 berating me for the content I had posted on the Memes Page. I subsequently removed  
3 Garvais/Siri Sanguine and the Washington Chapter’s Media Liaison, Paul Case (who used  
4 the pseudonym Tarkus Claypool) as editors and admins from the page.

5           11.     After I removed Garvais/Siri Sanguine and Case/Tarkus Claypool as admins  
6 from the Memes Page, David Johnson changed the name of the page from the mistaken “TST-  
7 WA Allies” to the name “Evergreen Memes for Queer Satanic Fiends” to track the intended  
8 memes purpose for the former South Sound Satanist’s page.

9           12.     I then posted on the Memes Page that the page was no longer affiliated with  
10 the Washington Chapter.

11           13.     In response to these changes, at 7:48 pm that same evening, Garvais/Siri  
12 Sanguine sent an email to the Washington Chapter stating that I had “stolen” the page.

13           14.     However, after her 7:48 pm email, the Washington Chapter leadership decided  
14 to give the page to me and to David Johnson. Specifically, attached hereto as **Exhibit 1** is a  
15 true and correct copy of an email I received from Paul Case/Tarkus Claypool, the Media  
16 Liaison, at 9:09 pm on March 14, 2020. In the email, Case/Tarkus Claypool referred to the  
17 new name of the page in the subject line - “Evergreen Memes for Queer Satanic Fiends.” In  
18 the email, Case/Tarkus Claypool acknowledged the changes to the Memes Page and told me  
19 that the Washington Chapter had no interest in reclaiming it and that Johnson and I could  
20 have and use the page “free and clear:”

21           Hi Lenore,

22           I saw that you made some changes to the TST WA State Allies FB group.  
23           **I just wanted to let you know that it’s yours free and clear and we’ve**  
24           **no desire to claim it.** You and ADJ [Defendant Johnson] built it and have  
25           done a great job doing so. I’m confident you’ll both continue doing  
26           awesome work.

          Sorry the way things panned out, and I do mean all of it. I wish you and  
          your family well, and respect your need to fight the fight your way.  
          Rock on,

1 Tarkus Claypool  
2 Media Liaison, The Satanic Temple of Washington  
3 (he/him)

4 See **Ex. 1.** (emphasis added).

5 15. The next day, in a March 15, 2020 Washington Chapter online town hall  
6 meeting via Zoom that was hosted by Garvais/Siri Sanguine and Case/Tarkus Claypool,  
7 Case/Tarkus Claypool again publicly and expressly reiterated in front of his co-host  
8 Garvais/Siri Sanguine and Washington Chapter members that the Washington Chapter had  
9 relinquished all interest in the Memes Page. I understand that my co-defendant, David  
10 Johnson, has attached a recording of this Zoom meeting as Exhibit 3 to his declaration, which  
11 I incorporate herein by reference. In the Zoom meeting Case/Tarkus Claypool stated:

12 I do want to say that **we're not going to, you know, ask Lenore to give**  
13 **the page back in any way. I wish them well, and I hope that they**  
14 **continue growing that and make it a great success.** Because they're going  
15 to fight their fight, their way. And so, let them do what they want to, and I  
16 wish them well, because both Lenore and ADJ [Johnson] did a wonderful  
17 job in the roles that they had. It just wasn't within the TST guidelines that  
18 we are beholden to. So I want to give them due credit, and just you know,  
19 **wish them well with what they're going to plan to do with it in the**  
20 **future.**

21 Exhibit 3 to Declaration of David Johnson, at timestamp 1:20:35. Garvais/Siri Sanguine, who  
22 was running the town hall, agreed with Case in relinquishing interest in the page and even  
23 complimented our work on the page. *See* Ex. 3 to Johnson Declaration at timestamp 1:21:10.

24 16. In reliance on these express statements that we could use the Memes Page for  
25 our own purposes, David Johnson and I proceeded to use the Memes Page for our own  
26 purposes.

17 17. At no point have either Garvais/Siri Sanguine or Case/Tarkus Claypool or  
18 anyone else from the Washington Chapter retracted these statements.

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18. I remained an admin on the Memes Page for only a few months, until July of 2020. I have not been an admin on the Memes Page since July of 2020 nor have I had any ability to regain admin status or otherwise control the Memes Page since July of 2020.

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

Executed in Seattle, Washington on this 23rd day of August 2024.

*Mickey J Powell*  
Mickey J Powell (Aug 23, 2024 07:34 PDT)  
\_\_\_\_\_  
Mickey Powell

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date I caused true and correct copies of the foregoing  
3 document to be served upon the following, at the addresses stated below, via the method of  
4 service indicated.

5 **LYBECK PEDREIRA & JUSTUS, PLLC**

6 Benjamin Justus  
7 Fifth Floor  
8 7900 SE 28th St., Suite 500  
9 Mercer Island, WA 98040  
ben@lpjustus.com

E-mail  
 U.S. Mail  
 E-filing

10 **KEZHAYA LAW PLC**

11 Matthew A. Kezhaya (*pro hac vice*)  
12 150 S. Fifth Street, Suite 1850  
13 Minneapolis, MN 55402  
matt@kezhaya.law

E-mail  
 U.S. Mail  
 E-filing

14 *Attorneys for Plaintiff*

15  
16 Dated this 23<sup>rd</sup> day of August, 2024 in Seattle, Washington.

17  
18 /s/ Janet C. Fischer  
19 Janet C. Fischer  
Paralegal

# **EXHIBIT 1**



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## Evergreen Memes for Queer Satanic Fiends

1 message

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**Tarkus Claypool** <tarkus.claypool@gmail.com>  
To: Lenore Calavera <lenorecalavera@gmail.com>

Sat, Mar 14, 2020 at 9:09 PM

Hi Lenore,

I saw that you made some changes to the TST WA State Allies FB group. I just wanted to let you know that it's yours free and clear and we've no desire to claim it. You and ADJ built it and have done a great job doing so. I'm confident you'll both continue doing awesome work.

Sorry the way things panned out, and I do mean all of it. I wish you and your family well, and respect your need to fight the fight your way.

Rock on,

-Tarkus Claypool  
Media Liaison, The Satanic Temple of Washington  
(he/him)

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**CONFIDENTIALITY NOTICE**

The content of this email is confidential and intended only for those parties who received the email directly from the [tarkus.claypool@gmail.com](mailto:tarkus.claypool@gmail.com) address. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender.