

EXHIBIT 1



Evergreen Memes for Queer Satanic Fiends

1 message

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 address. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender.

EXHIBIT 2

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

UNITED FEDERATION OF)
CHURCHES, LLC (DBA “THE)
SATANIC TEMPLE”),)
)
Plaintiff,)
)
v.)
)
DAVID ALAN JOHNSON (AKA “ADJ”),)
LEAH FISHBAUGH, MICKEY)
MEEHAM, AND NATHAN SULLIVAN,)
)
Defendants.

No. 20-cv-509
COMPLAINT FOR DAMAGES
AND INJUNCTIVE RELIEF

In support of its claims, Plaintiff United Federation of Churches, LLC (dba “The Satanic Temple”) (abbreviated as “TST”) alleges as follows:

I. PREAMBLE

1. This case is about two hacked social media accounts and failed attempts at hacking a social media account and an email account. TST is suing Defendants for misappropriating two of TST’s Facebook business pages by replacing all approved administrators with themselves. Shortly after the misappropriation, Johnson started posting content critical of TST from TST’s own webpage while retaining the original branding. Later, Johnson modified the name of the website, ostensibly to create a competitor organization, while appending the suffix “Archive Temple Chapter.” Defendants now wrongfully maintain exclusive control of over five years of content, all created by and for TST, on websites with more than 17,500 followers. Because of Defendants’ defamatory commentary, unfairly aimed directly at

1 TST’s audience, the Washington Chapter has lost members and has had its reputation harmed.

2 2. The questions presented by this case are whether the above constitutes (1) cyber
3 fraud and abuse under the Computer Fraud and Abuse Act (“CFAA”); (2) cyberpiracy under the
4 Lanham Act; (3) tortious interference with business expectancy under Washington common law;
5 (4) unfair competition; or (5) defamation.

6 3. If so, the Court should find Defendants liable for permanent injunctive relief to
7 return the websites to TST as their rightful owner and to refrain from accessing any TST
8 materials, statutory damages, punitive damages, attorney’s fees, and the costs of litigation. In
9 aggregate, Defendants should be ordered to pay \$142,973.92 or more in statutory and economic
10 damages.

11 **II. JURISDICTION AND VENUE**

12 4. This Court has original jurisdiction over the federal claims arising under the CFAA
13 and the Lanham Act. 28 U.S.C. § 1331 (federal question); 18 U.S.C. § 1030(g) (CFAA); 15 U.S.C.
14 § 1121 (trademark). The Court has supplemental jurisdiction over the state common law claims
15 arising from the same facts. 28 U.S.C. § 1367.

16 5. The Court can properly exercise personal jurisdiction over each Defendant because
17 they live within this District.

18 6. Venue properly lies with this Court because the hacking took place in Seattle,
19 Washington. 28 U.S.C. § 1391.

20 **III. PARTIES**

21 7. TST is a religious organization. See generally “About us,” available at
22 <https://www.thesatanictemple.org/about-us.html>

23 8. TST subscribes and advances seven fundamental tenets:

- 24 (1) One should strive to act with compassion and empathy toward all creatures
25 in accordance with reason.
26 (2) The struggle for justice is an ongoing and necessary pursuit that should
prevail over laws and institutions.

- 1 (3) One's body is inviolable, subject to one's own will alone.
- 2 (4) The freedoms of others should be respected, including the freedom to
3 offend. To willfully and unjustly encroach upon the freedoms of another is
4 to forgo one's own.
- 5 (5) Beliefs should conform to one's best scientific understanding of the world.
6 One should take care never to distort scientific facts to fit one's beliefs.
- 7 (6) People are fallible. If one makes a mistake, one should do one's best to
8 rectify it and resolve any harm that might have been caused.
- 9 (7) Every tenet is a guiding principle designed to inspire nobility in action and
10 thought. The spirit of compassion, wisdom, and justice should always
11 prevail over the written or spoken word.

12 See "Our tenets" available at <https://www.thesatanictemple.org/our-tenets.html>.

13 9. TST's mission is to "encourage benevolence and empathy among all people,
14 reject tyrannical authority, advocate practical common sense and justice, and be directed by the
15 human conscience to undertake noble pursuits guided by the individual will." See "Our mission"
16 available at <https://www.thesatanictemple.org/our-mission.html>.

17 10. TST was the subject of the recent documentary "Hail Satan?" (2019), directed by
18 Penny Lane and distributed by Magnolia Pictures.

19 11. TST maintains sole title to the trade name "The Satanic Temple" in the context of
20 religious organizations. See **Exhibit 1** (registration of trademark).

21 12. TST has adherents in each of the 50 States, importantly to include Washington.
22 Groups of adherents are commonly denominated "Chapters." Chapters are largely autonomous
23 but are subject to centralized control to ensure faithfulness to organizational principles and
24 purposes.

25 13. Defendant David Alan Johnson is an individual residing in Seattle, which is within
26 this Court's District. Johnson is a former associate of TST who misappropriated TST's
Washington Chapter Facebook website from within this Court's District and is using it and its
audience in an effort to undermine TST and to create a competitor organization.

14. Defendant Leah Fishbaugh is an associate of Johnson, and former associate of

1 TST, who aided and abetted the hacking. Fishbaugh also lives in Seattle. Fishbaugh changed
2 the account credentials to the Washington Chapter’s email account in a failed attempt to usurp
3 control over the email account. On information and belief, Johnson has wrongfully given
4 Fishbaugh administrative privileges to TST’s Washington Chapter page.

5 15. Defendant Mickey Meeham is an associate of Johnson, and former associate of
6 TST, who aided and abetted the hacking. Meeham also lives in Seattle. On information and
7 belief, Johnson has wrongfully given Fishbaugh administrative privileges to TST’s Washington
8 Chapter page. Meeham misappropriated the Affiliate page.

9 16. Defendant Nathan Sullivan is an associate of Johnson, and former associate of
10 TST, who aided and abetted the hacking. Sullivan also lives in Seattle. TST entrusted Sullivan
11 as the custodian of various documents which constitute trade secrets. Examples include original
12 signed membership agreements, internal policies and procedures, and a listing of members with
13 contact information. Sullivan now wrongfully maintains exclusive control over these sensitive
14 documents. On information and belief, Johnson has wrongfully given Sullivan administrative
15 privileges to TST’s Washington Chapter page.

16 **IV. FACTUAL BACKGROUND**

17 17. Facebook is a ubiquitous internet social medium which permits users to create and
18 share content including without limitation links, commentary, and written conversations. Content
19 can be shared by individuals on personal pages or by organizations on business pages.

20 18. Twitter is also a ubiquitous internet social medium which permits users to create and
21 share substantially similar content as Facebook.

22 19. Google is a ubiquitous internet-based information platform. Among its many
23 services, Google provides an email platform (“Gmail”) and a cloud-based document creation and
24 storage platform (“Google Drive.”)

25 20. Facebook is TST’s primary platform of communicating with its membership.

26 21. Twitter is TST’s secondary platform of communicating with its membership.

1 22. TST’s Washington Chapter has a Google account to generally facilitate its
2 organizational purposes by creating and storing documents.

3 23. In October of 2014, the Washington Chapter business page was created exclusively
4 for the benefit of TST in its efforts to disseminate information for what was then the Seattle Chapter.
5 This page, in its current state, is available at
6 <https://www.facebook.com/thesatanictemplewashington> (content predating March 20, 2020).

7 *See also Exhibit 2* (Chapter page history)

8 24. Over the next several years, the Washington Chapter grew the Facebook page to an
9 audience exceeding 17,000 followers. *Id.*

10 25. In January of 2015, the Washington Chapter created a Twitter account for the
11 organization. *See* https://twitter.com/TST_Washington. Currently, the Twitter account has an
12 audience of about 4,000 followers. *Id.*

13 26. In September of 2018, the Washington Chapter created a secondary Facebook page,
14 named “TST WA Allies,” to facilitate communications with individuals who were interested in TST
15 but did not want to identify as a member. This page, in its current state, is available at
16 <https://www.facebook.com/queersatanicmemes>; *see also Exhibit 3* (Allies page history). The
17 Allies page has about 500 followers.

18 27. Until the hacking by Defendants, both Facebook pages were maintained and
19 controlled exclusively by approved administrators.

20 28. Administrators are subject to a written Membership Agreement and Code of
21 Conduct, which instruct requirements for permissible activity on behalf of TST. In relevant part,
22 the instructions pertaining to online conduct follow:

23 Public statements & interactions with med

24 All public actions and statements must be approved and vetted by the TST National Council
25 and the TST Executive Council. If a member is approached by media or asked for any
26 official statement regarding an action or belief relating to TST all members must refrain

1 from comment and refer the inquiring party to the Chapter Head.

2 ...

3 Confidentiality

4 Members should respect confidentiality, including documentation. Internal information
5 should not be shared beyond members of the local chapter. Members' names, contact
6 information, and meeting locations are also considered confidential. If you are ever unsure,
7 don't share.

8 ...

9 Copyright

10 Material produced by The Satanic Temple is the property of the organization. Consent for
11 use of logo, name or other identity materials may be approved for use for certain projects.
12 You may not use any official materials without prior approval. Approval may also be
13 withdrawn at any time.

14 ...

15 Online code of conduct

16 As a member of TST, your interactions with others, both online and off, will be held to the
17 TST Code of Conduct. As an individual, we support your freedom of speech and freedom
18 to hold your opinions. Members' behavior, however, reflects on the organization as whole
19 and also builds the internal culture of TST. Therefore, we have a code of conduct specifically
20 for the internet.

21 Respect the diversity of opinions you find online and respond in a courteous manner. All
22 TST members' online conduct must be free of harassment, stalking, threats, abuse, insults,
23 defamation, or humiliation. This includes, but is not limited to, demeaning comments of an
24 ethnic, religious, sexist, or racist nature; and unwanted sexual advances or intimidation by
25 email or online. Such behavior will result in termination from the organization.

26 As a member of TST, always assume that what you publish on the web is permanent.

1 Anyone can easily print out a comment or save it as a screenshot. Remember, that TST is
2 often engaged in legal suits and exchanges online, or via text have the right to be exposed in
3 the case of a deposition. Think before you hit “send”.

4 Using TST in connection with surveys, contests, pyramid schemes, chain letters, junk email,
5 spamming or any duplication or unsolicited messages is prohibited and will result
6 termination from the organization.

7 Any public disagreements between TST members should be taken to a private conversation.

8 If mediation is needed, it will be provided.

9 *See* Membership Agreement and Code of Conduct (abbreviated as “Code of Conduct”), available
10 as **Exhibit 4**.

11 29. The above terms of the Code of Conduct form the contours of administrators’
12 authorization to access TST’s social media accounts.

13 30. Defendants, each, were entrusted with administrative rights to the above-described
14 social media accounts, subject to the requirements set forth in the Code of Conduct.

15 31. Until the hacking, Defendant Sullivan had exclusive access to the original copies of
16 each Defendants’ signature, acknowledging and agreeing to be bound by the above terms in return
17 for access to the social media accounts.

18 32. On information and belief, Sullivan still has exclusive access to these documents,
19 among other highly sensitive materials including membership listings, internal policies and
20 procedures, and meeting notes.

21 33. Defendants were each well aware of the Code of Conduct because it served as a
22 source of friction leading up to the events giving rise to this litigation. For example, on March 2,
23 2020, Johnson shared the following post on the Allies page outside of his authority:
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34. The ensuing deletion and reiteration of the expectation that Johnson adhere to the Code of Conduct as a condition of continued social media access would serve as foreshadowing for the misappropriation of the Allies page.

35. Some time before March 14, 2020, Defendants entered into an unlawful agreement to misappropriate and shut down substantially all the internet presence of TST’s Washington Chapter. Defendants sought to advance the twin goals of forming a competitor organization and harming TST.

36. On March 14, 2020, Meeham exceeded authorization for the Allies page by removing all TST-approved administrators except the other named Defendants, changing the name to “Evergreen Memes for Queer Satanic Friends,” and posting the following manifesto:



Evergreen Memes for Queer Satanic Fiends

March 14 at 7:59 PM · 🌐



This page is no longer affiliated with The Satanic Temple.

Ave Satanas!

I was recently notified that talking about transphobes and ableism was considered not to be relevant to The Satanic Temple's "International Council" in Salem or to the local chapter in Washington State.

So by talking about leftist politics like how "The struggle for justice is an ongoing and necessary pursuit that should prevail over laws and institutions," this page wasn't being Satanic.

Specifically:

"(IC is aware of how badly the allies page is fucking up), isn't worried about being labelled a criminal (and endorses negative and unrelated leftist politics on TST-affiliated social media). TST WA Allies should be about Satanism. On March 4th, this was told to you and ADJ, but just as recently as two days ago, there is a post about ableism. (this as a post from an individual is great - as TST WA not acceptable)."

So to be clear, this page thinks ableism, misogyny, and racism are superstitions, fascists are bad, transphobes can shut the fuck up, and the only good bootlickers do it for a kink and not because they love making excuses for cops killing people.

No gods, no masters.

Be gay, do crime, hail Satan

37. Meeham, in conjunction with the other named Defendants, has since been posting material in violation of the Code of Conduct.

38. On or around March 18, 2020, Johnson exceeded authorization for the Twitter account by following a number of extremist groups to create a false impression of affiliation between TST and extremism, and changing the description from "Washington State Chapter of the Satanic Temple" to "Satan stands as the ultimate icon for selfless revolt. We oppose irrational, unjust hierarchies like white supremacy, patriarchy, ableism, & cishet normality."

39. On March 20, 2020 beginning at 10:11 pm, Johnson exceeded authorization for the Chapter page by removing all TST-approved administrators, modifying the cover page without approval, and posting a three-page manifesto. The manifesto, as it looks today, is attached and incorporated as **Exhibit 5** (the archive reflects Central time). Originally, the manifesto was posted with the original trade dress of TST.

40. Broadly, the manifesto levies false claims that TST leadership is cozy with the alt-right, are white supremacists, are generally insufficiently leftist for Johnson's preference, and does

1 not conform to Johnson’s impression of Satanism. Posting the manifesto exceeded Johnson’s grant
2 of authority as defined in the Code of Conduct.

3 41. Johnson then spent the next couple days posting links and commentary from the
4 Chapter page, all with the general, and false, theme that TST leaders are incompetent fascists. See
5 **Exhibit 6** (posts and commentary in excess of authority). The links and commentary all exceeded
6 Johnson’s grant of authority as defined in the Code of Conduct.

7 42. On March 20 at 11:36 pm, Fishbaugh exceeded authorization by changing the
8 password to the Chapter’s Google-based email account, changing the recovery email, and changing
9 the phone number.

10 43. On March 22 at 3:08 pm, Johnson modified the name of the Chapter page from “The
11 Satanic Temple Washington” to “Satanic Washington State – Archived Temple Chapter” and
12 modified the profile picture to replace TST-specific iconography with “antifa” symbolism. These
13 modifications exceeded Johnson’s grant of authority as defined in the Code of Conduct.

14 44. As a result of the foregoing conduct, Sullivan’s control over original signed copies
15 of membership agreements and cloud-based trade secret documentation, became unauthorized.
16 Sullivan’s continued control over these materials exceeds the authority granted by the Code of
17 Conduct.

18 45. “Antifa” is a left-wing political movement with a penchant for violence.

19 46. TST opposes the use or threat of violence as a mechanism for control.

20 47. The Chapter page maintains its original URL:
21 <https://www.facebook.com/TheSatanicTempleWashington/>.

22 48. As of the date of filing, TST’s Washington Chapter has lost between 20 and 30
23 members because of Johnson’s false claims published to the Chapter page.

24 49. TST’s Washington leadership have repeatedly demanded the return of the
25 Facebook pages from both Facebook and Defendants.

26 50. Facebook refused to correct the matter, mislabeling the issue as a “Page admin

1 issue” to the exclusion of “infringements of your legal rights.”

2 51. One week ago, this time through counsel, TST reiterated to Facebook and to
3 Johnson the unlawful nature of the foregoing conduct of Defendants.

4 52. Facebook did not respond and did not correct the issue.

5 53. Defendants simply ignored all communications, from counsel and TST alike.

6 54. TST was able to recover the Twitter account and the email account through
7 Twitter and Google, respectively.

8 55. TST is unable to recover the Facebook account without relief from this Court.

9 **III. CAUSES OF ACTION**

10 **Count 1:**

11 **CFAA violation**

12 56. The CFAA provides a civil cause of action when a Defendant knowingly accesses a
13 “protected computer” by “exceeding authorized access,” which causes a cumulative “loss” of at
14 least \$5,000. *See* 18 U.S.C. § 1030(g), (c)(4)(A)(i)(I). Or, in the case of an attempted violation, the
15 successful violation would cause at least \$5,000 in “loss.” *Id.*

16 57. A “computer,” is broadly defined as any device for processing or storing data. 18
17 U.S.C. § 1030(e)(1).

18 58. A “protected computer” is a “computer” which is “used in or affecting interstate or
19 foreign commerce or communication.” 18 U.S.C. § 1030(e)(2)(B).

20 59. Websites have been recognized as a “protected computer” within the meaning of the
21 CFAA. *See United States v. Drew*, 259 F.R.D. 449, 457-58 (C.D. Cal. 2009).

22 60. A defendant “exceeds authorized access” by accessing a computer “with
23 authorization and to use such access to obtain or alter information in the computer that the accesser
24 is not entitled so to obtain or alter.” 18 U.S.C. § 1030(e)(6).

25 61. A “loss” is “any reasonable cost to any victim, including the cost of responding to
26 an offense, conducting a damage assessment, and restoring the data, program, system, or

1 information to its condition prior to the offense, and any revenue lost, cost incurred, or other
2 consequential damages incurred because of interruption of service.” 18 U.S.C. § 1030(e)(11).

3 62. As described above, Defendants wrongfully and intentionally by exceeding their
4 authorized access, perpetrated fraud upon TST and its membership, as well as any who happened
5 upon the offending posts, by posting under the misappropriated identity of TST. Perfectly
6 encapsulating the issue, one commenter expressed confusion on March 21, stating:



7 **Pete Reeves** I'm confused as to why a TST Facebook page is being
8 used to attack TST... Shouldn't that be left to the Evangelical
9 Christians?

Like · Reply · 1w



10 **Pete Reeves** I'm confused as to why a TST Facebook page is being
11 used to attack TST... Shouldn't that be left to the Evangelical
12 Christians? Saturday, March 21, 2020 at 1:59 PM

Like · Reply · 1w



13 See <https://www.facebook.com/TheSatanicTempleWashington/posts/2908426992513671>

14 63. There is a cognizable dollar value to social media accounts. Preliminary estimates
15 of the “loss” related to the misappropriation of the Chapter page is \$33,689.70, plus \$1,037.52 for
16 the Allies page. The Twitter page, if successfully misappropriated, would have lost \$8,246.70. The
17 aggregate sum being \$42,973.92—well in excess of the \$5,000 jurisdictional requirement.

18 64. Further compounding the losses are TST’s attorney’s fees for investigating this
19 matter, entering futile demands for corrective action to both Facebook and Defendants, and
20 preparing this legal action. TST will continue to incur losses in the costs and fees related to this
21 lawsuit. TST’s costs and attorney’s fees already exceed \$6,000 for dealing with this matter.

22 65. TST has incurred, and continues to incur, reputation losses from the
23 misappropriation of its Facebook pages. These reputation losses are irreparable by money damages.

24 66. Based on the foregoing, TST is entitled to injunctive relief in the form of an order
25 requiring Defendants surrender control of the Facebook pages, a permanent injunction enjoining
26

1 Defendants from accessing any of TST’s “protected computers” (i.e. any internet-based media)
2 under threat of contempt, and economic damages of at least \$48,973.92.

3 **Count 2:**

4 **Cyberpiracy**

5 67. The Lanham Act makes cyberpiracy an actionable trademark violation. 15 U.S.C. §
6 1125(d).

7 68. The Lanham Act provides for a statutory award of not less than \$1,000 and not more
8 than \$100,000. 15 U.S.C. § 1117(d). A plaintiff is also entitled to the costs of the litigation and, in
9 the Court’s discretion, a reasonable attorney’s fee. 15 U.S.C. § 1117(a).

10 69. Injunctive relief is also available to a successful plaintiff. 15 U.S.C. § 1116.

11 70. TST holds the exclusive rights to the name “The Satanic Temple.” **Exhibit 1.**

12 71. Defendants are trafficking in the name “The Satanic Temple” by misappropriating
13 the website located at the URL “facebook.com/**TheSatanicTemple**Washington” (emphasis added).

14 72. Bad faith is established by the manner in which Defendants hijacked the webpages,
15 attempted to hijack the Twitter and email accounts, removed all approved administrators, gloated
16 about the matter, and refused to return control of the websites to their rightful owners.

17 73. Based on the foregoing, TST is entitled to injunctive relief in the form of an order
18 requiring Defendants surrender control of the Facebook pages, a permanent injunction enjoining
19 Defendants from accessing any of TST’s “protected computers” under threat of contempt, statutory
20 damages between \$1,000 and \$100,000, costs, and a reasonable attorney’s fee.

21 **Count 3:**

22 **Tortious interference with business expectancy**

23 74. TST maintains ongoing business relationships with Facebook, importantly to
24 include the Chapter page and Allies page.

25 75. There is an economic benefit for TST in having a ubiquitous platform to interact
26 with members and prospective members in the convenience of their homes and wherever they carry

1 their smartphones. Namely, with increased awareness comes increased membership and donations
2 which create a positive feedback loop.

3 76. At the relevant time, Defendants had subjective knowledge of the business
4 relationship.

5 77. Defendants intentionally and with an improper motive acted to sever the Washington
6 Chapter's relationships with Facebook by misappropriating the two websites for the twin goals of
7 harming the Washington Chapter, and TST at large, and creating a competitor organization.

8 78. As a direct and proximate result of Defendants' wrongful conduct, TST has suffered
9 substantial economic injury and loss of business opportunity and has incurred attorney's fees and
10 other costs in attempting to remedy the situation.

11 79. Based on the foregoing, TST is entitled to injunctive relief in the form of an order
12 requiring Defendants surrender control of the Facebook pages, a permanent injunction enjoining
13 Defendants from accessing any of TST's "protected computers" under threat of contempt and
14 punitive damages.

15 **Count 4:**

16 **Violations of the Consumer Protection Act**

17 80. Washington's Consumer Protection Act prohibits unfair, unconscionable, or
18 deceptive methods in the conduct of trade or commerce. *See* Chapter 19.86 RCW.

19 81. TST has protected, registered trade names and common law trade dress for the
20 services it provides to the community. Of importance to this case, the name "The Satanic Temple"
21 is a registered mark; and the symbolism and content included in the Chapter page and Allies page
22 at the time substantially all of the offending material was posted are trade dress.

23 82. Further, TST has a protected interest in its trade secret materials including
24 membership listings, membership agreements, internal policies and procedures, other governance
25 materials, and access to a hard-won social media following.

26 83. Defendants' unauthorized use of TST's protected intellectual property are intended

1 to unlawfully aid in the creation of a competitor organization by diverting the recognition arising
2 from TST's reputation and goodwill.

3 84. Defendants' unauthorized use of TST's protected intellectual property is intended to
4 deceive the public with a deliberate, willful intent to disparage or pass off competitor services as
5 those of TST, for the end-goal of harming TST's goodwill.

6 85. The harm to TST's goodwill cannot be adequately remedied at law.

7 86. The unfair or deceptive acts or practices occurred in the conduct of Defendants'
8 trade or commerce.

9 87. The unfair or deceptive acts or practices impact the public interest.

10 88. As a result of Defendants' unfair or deceptive acts or practices Plaintiff suffered
11 injury to its business or property.

12 89. Defendants' acts or practices are the proximate cause of damages suffered by
13 Plaintiff.

14 90. Based on the foregoing, TST is entitled to injunctive relief in the form of an order
15 requiring Defendants surrender control of the Facebook pages, surrender control of all TST
16 materials, a permanent injunction enjoining Defendants from accessing any of TST's "protected
17 computers" under threat of contempt, a permanent injunction enjoining Defendants from making
18 use of any information obtained during their association with TST under threat of contempt, and
19 actual and treble damages.

20 **Count 5:**

21 **Defamation**

22 91. Defendants owed and continue to owe a duty to TST to refrain from publishing false
23 and defamatory statements about TST and its employees.

24 92. By falsely ascribing extremist ideologies and affiliations to TST, Defendants
25 published and republished false and defamatory statements about TST and TST's employees.

26 93. The false and defamatory statements published by Defendants regarding TST and

1 its employees, as reasonably understood by outside observers, impugns the integrity and competence
2 of TST and its employees, discredits TST's activities, undermines confidence of the public in TST's
3 role in the community, and drives away current and prospective members from TST.

4 94. The false and defamatory statements published by Defendants, when considered
5 alone, tends to subject TST and its employees to hatred, distrust, ridicule, contempt, or disgrace, and
6 tends to injure TST's reputation.

7 95. By carrying out the foregoing conduct, Defendants acted maliciously and with
8 reckless indifference to the consequences of their actions and the rights of TST.

9 96. Based on the foregoing, TST is entitled to injunctive relief in the form of an order
10 requiring Defendants surrender control of the Facebook pages, surrender control of all TST
11 materials, a permanent injunction enjoining Defendants from publishing false statements about TST
12 or any of its membership, and punitive damages.

13 **IV. PRAYER FOR RELIEF**

14 **WHEREFORE**, in addition to all other relief to which the Court finds TST entitled,
15 TST prays for orders providing as follows:

16 (1) Defendants shall, jointly and severally, immediately return full control of the
17 following to Plaintiff, under threat of contempt:

- 18 (a) The Chapter Facebook page
19 (b) The Allies Facebook page; and
20 (c) All TST materials, whether in paper or electronic format, including without
21 limitation: all signed agreements, all membership listings, all internal policies
22 and procedures, all governance documentation, any branding materials, and any
23 other document created by or for the benefit of TST.

24 (2) Defendants shall, jointly and severally, permanently refrain from the following
25 under threat of contempt:

- 26 (a) Accessing any administrative function of any internet-based medium, including

1 without limitation any social media accounts, email accounts, or document
2 storage accounts, created by or for the benefit of TST

3 (b) Publishing or republishing false statements about TST or any of its membership
4 or causing or permitting third parties to publish or republish false statements
5 about TST or any of its membership.

6 (3) Defendants shall, jointly and severally, pay economic damages to Plaintiff in an
7 amount to be determined by the Court, to meet or exceed \$42,973.92.

8 (4) Defendants shall, jointly and severally, pay statutory damages to Plaintiff in an
9 amount to be determined by the Court, to meet or exceed \$100,000.

10 (5) Defendants shall, jointly and severally, pay treble damages to Plaintiff in an amount
11 to be determined at trial.

12 (6) Defendants shall, jointly and severally, pay attorney's fees and costs to Plaintiff in
13 an amount to be determined after trial.

14 (7) Defendants shall, jointly and severally, pay pre-judgment and post-judgment interest
15 until paid in full.

16
17 Respectfully submitted this 3rd day of April, 2020.

18 LYBECK PEDREIRA & JUSTUS, PLLC

19
20 By: /s/ Benjamin Justus
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ben@lpjustus.com / email Justus

And: /s/ Matthew A. Kezhaya
Matthew A. Kezhaya (AR#2014161), pro hac vice pending
Attorney for Plaintiff
Kezhaya Law PLC

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479.431.6112 /ph 479.282.2892 /fax
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THE SATANIC TEMPLE

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Goods and Services IC 045. US 100 101. G & S: Religious services, namely, information and news relating to religious and philosophical beliefs by providing information; providing a web site featuring information about religion; Charitable outreach services, namely, providing counseling services in the field of religion; Counseling in the field of religion and spiritual services. FIRST USE: 20130101. FIRST USE IN COMMERCE: 20130101

Standard Characters Claimed

Mark Drawing Code (4) STANDARD CHARACTER MARK

Serial Number 86221887

Filing Date March 14, 2014

Current Basis 1A

Original Filing Basis 1A

Date Amended to Current Register December 17, 2014

Registration Number 4686134

Registration Date February 10, 2015

Owner (REGISTRANT) United Federation of Churches, LLC DBA The Satanic Temple LIMITED LIABILITY COMPANY MASSACHUSETTS 519 Somerville Ave. No. 288 Somerville MASSACHUSETTS 02143

Attorney of Record Daryl Abbas

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Exhibit 2


TST's Washington Chapter Facebook page history


Page Transparency for Satanic Washington State - Archived Temple Chapter ×


Summary **Page History** People Who Manage This Page Organizations That Manage This Page

Page History
Name changes can help you see if the Page's purpose has changed over time. If Page merges have occurred, that means that the Page has combined its followers with another Page.



 Changed name to **Satanic Washington State - Archived Temple Chapter**
March 22, 2020

 Changed name to **The Satanic Temple - Washington State Chapter**
January 1, 2020

 Page created - **The Satanic Temple - Seattle Chapter**
October 19, 2014

[Find Support or Report Page](#) Close


Exhibit 3


TST's Washington Chapter Allies Facebook page history


Page Transparency for Evergreen Memes for Queer Satanic Fiends ×


Summary **Page History**

Page History
Name changes can help you see if the Page's purpose has changed over time. If Page merges have occurred, that means that the Page has combined its followers with another Page.



 Changed name to **Evergreen Memes for Queer Satanic Fiends**
March 14, 2020

 Changed name to **TST WA Allies**
January 6, 2020

 Page created - **South Sound Satanists: Friends of TST**
September 11, 2018

[Find Support or Report Page](#) [Close](#)



The Satanic Temple of Washington

Membership Agreement and Code of Conduct

As a member of The Satanic Temple of Washington, I, _____, agree to abide by the following Code of Conduct:

I. INTRODUCTION

This code of conduct describes the values that inform the work and activities of The Satanic Temple of WA. It also sets out guidelines for the kind of behavior that we expect of each other, and outlines procedural steps to file a complaint or allegation if a member has not lived up to our values or reasonable expectations of behavior.

The Code of Conduct describes our values and behaviors in broad terms. It is not exhaustive and a “common sense” test will apply to complaints about conduct not covered here.

II. MEMBERS

This guide applies to all individuals who affiliate with The Satanic Temple of WA in any approved, official capacity. Members must abide by our Seven Tenets.:

III. THE SEVEN TENETS

One should strive to act with compassion and empathy towards all creatures in accordance with reason.

The struggle for justice is an ongoing and necessary pursuit that should prevail over laws and institutions.

One's body is inviolable, subject to one's own will alone.

The freedoms of others should be respected, including the freedom to offend. To willfully and unjustly encroach upon the freedoms of another is to forgo your own.

Beliefs should conform to our best scientific understanding of the world. We should take care never to distort scientific facts to fit our beliefs.

People are fallible. If we make a mistake, we should do our best to rectify it and resolve any harm that may have been caused.

Every tenet is a guiding principle designed to inspire nobility in action and thought. The spirit of compassion, wisdom, and justice should always prevail over the written or spoken word.

IV. VALUES

Action: The goal of TST is to facilitate the communication and mobilization of politically aware Satanists, secularists, and advocates for individual liberty and participate in public affairs wherever issues might benefit from rational satanic insights.

Solidarity: We are enmeshed in overlapping systems of power rooted in a history of unchallenged theocracy. As individuals, it is our responsibility to acknowledge those systems, and make alliances with the dispossessed. Collectively, it is our task to liberate ourselves and others via positive assertion of our values, rather than attacking the opposition.

Liberty: Physical integrity and emotional safety are basic human rights. TST will revoke membership and end any affiliation with any members who assault, degrade, or cause harm to any other individual within the organization or outside. Violence or threat of violence upon a person, property, or institution shall also not be tolerated.

Character: Political resistance is a serious undertaking that requires loyalty, commitment, integrity, and courage. Members must always strive to enact these values in both our political organizing and our personal lives.

Respect & Equal Opportunity: We believe that everyone is entitled to respect and should have an equal opportunity to contribute to our work. We will treat everyone with respect, including those who oppose us. Members have the right to disagree with one another. We encourage all to listen to the thoughts of our comrades and understand that we all have a diversity of experiences and beliefs. Additionally, values of dignity and respect encompass recognition of different roles within the movement, including those of other activists, volunteers and staff. These different roles imply differing constraints and authority.

Social Conscience: Members undertake their work in the interests of The Satanic Temple and the wider international movement. They do not seek to gain financial or other material benefit for themselves, their family or friends through this work.

V. ADDITIONAL GUIDELINES FOR BEHAVIOR

This section provides guidelines to inform the conduct of members in specific situations. These guidelines are not exhaustive but are provided to help negotiate dilemmas that can arise.

Public statements & interactions with media:

All public actions and statements must be approved and vetted by the TST International Council and the TST Executive Council. If a member is approached by media or asked for any official statement regarding an action or belief relating to TST all members must refrain from comment and refer the inquiring party to the Chapter Head.

Public actions: Protestors and law enforcement:

Members must refrain from confronting protesters, both verbally and physically. We must never show disrespect to the opposition, regardless of slander and attacks on reason. If a member feels physically threatened at any point or uncomfortable, leave the area. Discuss a plan of action prior to any public demonstration if you expect a potential run in with the police. It is encouraged to peacefully record any interactions with the public. Report any threats of violence to the Chapter Head.

Confidentiality:

Members should respect confidentiality, including documentation. Internal information should not be shared beyond members of the local chapter. Members' names, contact information, and meeting locations are also considered confidential. If you are ever unsure, don't share. Members may use a pseudonym in the Chapter to preserve their confidentiality.

Copyright Material produced by The Satanic Temple is the property of the organization:

Consent for use of logo, name or other identity materials may be approved for use for certain projects. You may not use any official materials without prior approval. Approval may also be withdrawn at any time.

Health & Safety:

Members are expected to take responsibility for their own health and safety and the health and safety of others when undertaking work or organizing events on behalf of TST. The TST National Council is able to provide advice and risk assessment if necessary. We cannot stress the importance of confidentiality as our best safety defense.

Public Harassment:

If members ever feel harassed, bullied or uncomfortable as a result of an interaction with outsiders we encourage you to remove yourself from the situation. Understanding that TST participation is often considered a highly controversial affiliation, members should be cautious of sharing this information with others. If placed in an uncomfortable situation, treat others with respect and refrain from behavior that may be construed as bullying or harassing, including malicious gossip. Bullying and harassment may be by an individual against an individual, or involve groups of people. It may be obvious or it may be insidious. Whatever form it takes, it is unwarranted and unwelcome to the individual. Bullying and harassment may or may not be deliberate.

General Decorum:

While members may make close friends and comrades as a result of being a part of The Satanic Temple, we encourage all to remember that we are dedicated to action, which requires a dedication of time, work, and resources. We expect all members to behave professionally and to uphold the code of conduct whenever affiliating with TST or its members.

VI. ONLINE CODE OF CONDUCT

As a member of TST, your interactions with others, both online and off, will be held to the TST Code of Conduct. As an individual, we support your freedom of speech and freedom to hold your opinions. Members' behavior, however, reflects on the organization as a whole and also builds the internal culture of TST. Therefore, we have a code of conduct specifically for the internet.

Respect the diversity of opinions you find online and respond in a courteous manner. All TST members' online conduct must be free of harassment, stalking, threats, abuse, insults, defamation, or humiliation. This includes, but is not limited to, demeaning comments of an ethnic, religious, sexist, or racist nature; and unwanted sexual advances or intimidation by email or online. Such behavior will result in termination from the organization.

As a member of TST, always assume that what you publish on the web is permanent. Anyone can easily print out a comment or save it as a screenshot. Remember, that TST is often engaged in legal suits and exchanges online, or via text have the right to be exposed in the

case of a deposition. Think before you hit “send”.

Using TST in connection with surveys, contests, pyramid schemes, chain letters, junk email, spamming or any duplication or unsolicited messages is prohibited and will result in termination from the organization.

Any public disagreements between TST members should be taken to a private conversation. If mediation is needed, it will be provided.

VII. FILING A COMPLAINT

It is preferable that problems are addressed informally and locally. When a complaint is made or an allegation received about the conduct of a member, it should be drawn to the attention of the local Chapter Head. If this is not an option, or if you require further assistance you may also contact the TST International Council via the TST Complaint Form.

Informal Process Informal action will involve the Chapter Head having a conversation with the member(s) concerned describing the complaint and listening to their version of events. If the grounds for complaint seem reasonable then recommendations may be provided in writing to avoid a recurrence of the incident. If, during discussion, it appears that informal action will not satisfactorily address the complaint or allegation, the formal procedure may be used.

b. Formal Process

i) Investigation: Formal complaints can be submitted to the National Council via the TST Complaint Form. A formal process will be used where a complaint or allegation is serious, or where repeated concerns about behavior have arisen. A decision to investigate an incident does not indicate support for a complaint, merely that further enquiry is necessary.

After determining that grounds for an investigation are merited, the member will be notified in writing about the complaint, about the decision to investigate.

The aim will be to complete an investigation within 30 working days, although this may not always be possible. The purpose of the investigation is to establish whether there are reasonable grounds for believing that a breach of the Code of Conduct has occurred. If no reasonable grounds are found to exist, the member will be notified and the matter will be closed.

ii) Outcome: If the complaint is felt to be justified and a member has fallen short of the standards expected in the Code, then the National Council will determine the action that is required. In some circumstances, this may involve a loss of membership or title within the organization.

iii) Confidentiality: Confidentiality is of the utmost importance and should be regarded as binding by everyone concerned. An allegation, and any subsequent information will only be disclosed in the interests of an effective investigation, ensuring a fair Code of Conduct meeting (or review) and to the extent clearly required for the implementation of recommendations or instructions

I have read and understood this code in full and I agree to abide by the terms presented here,

Member Signature

Date

Print member name

New Member Team Signature

Date

Satanic Washington State - Archived Temple Chapter

March 21 at 12:34 AM ·

Well, I think I gave them long enough.

- - -

Hail Satan! This is ADJ.

Until recently, social media for TST WA was my responsibility. Although no one has told me so directly, I don't think that's still actually the case, and I don't think I'm a member of TST anymore whatsoever.

Now, I say "I don't think" because I never got a phone call, email, or text message telling me that I have been removed, and as you can see, I didn't get my FB admin privileges revoked.

But I *did* get denied access to the group Discord server about a week ago, along with several other people, and I've been told there was Zoom meeting (that I still haven't watched) where the "senior leaders" who kicked us out without notice talked about us to the rest of the membership without us being able to be present.

Our violation, ironically enough, was not trusting our leadership. This is ironic because we're Satanists, and you'd think a healthy distrust of leadership would be assumed, if not a prerequisite.

It's also ironic because we were asked to trust people who couldn't be bothered to remove me or the others they kicked out from all the stuff we as active members had access to. Just yesterday, another person who got kicked out tweeted accidentally from the official account because they were still logged in (then undid). Heck, the same person saved the Memes page from getting deleted by removing everyone else as an admin before that could happen.

Actually, that's a great segue. Because apparently the first thing "Senior Leadership" did once they remembered we have a Twitter is change the description in the profile. Now, it's "Washington State Chapter of the Satanic Temple". Nothing wrong with that. But until a few days ago it was: "Satan stands as the ultimate icon for selfless revolt. We oppose irrational, unjust hierarchies like white supremacy, patriarchy, ableism, and cis het normality."

That's not a coincidence.

The reason the Memes page was going to get axed was because it was "fucking up" by talking about transphobia too much, instead of being only "about Satanism" like, I guess, saying "Hail Satan" when people sneeze or something. So remember that the next time the Mormon church calls your gender identity a work of the devil or TST WA goes out to a pride event: it's actually got nothing to do with you.

The messaging isn't the only thing.

The only reason I didn't let my morbid curiosity about how long I'd stay an admin run indefinitely is that after a bunch of us got kicked out for questioning leadership on a different issue (whether we should apologize to a former prominent member for continuing—consciously, subconsciously, and accidentally—to use their image to promote chapter after they left due to months of unaddressed sexual harassment three years ago), after *that*, former and inactive members came out of the woodwork describing how, for example, still-active member Pockets made their partner feel uncomfortable by refusing to use their pronouns, or how member Angel said her pronouns should be obvious if she spread her legs. Tarkus Claypool, who has one of two official positions that exist in the chapter as "Media Liaison" personally told us to take down an image of TERFs being bootlickers to patriarchy, apparently due to transphobia, although he denied that was the case when asked to his face.

We'd known that at higher levels in TST's pyramid, there was disrespect or outright hostility to trans people and queer issues based on Lucien Greaves / Doug Misicko opposition to including trans education as part of our curriculum for Tacoma's After School Satan. But LG Doug is a garbage person in so many ways, that's not a surprise. It was only after being made to leave that this pattern of years of behavior locally became more obvious, and a lot of us found out we weren't the only ones to feel this way or to have been treated this way.

Other people were lied to, lied about, or otherwise mistreated and isolated over the years, and it's real shitty to find out that Barrett, who you thought was your friend was coming to check on you and see how your mental health was doing but actually only there because Tarkus sent him to feel you out about how you felt about Tarkus

so Tarkus could kick you out of everything without telling any other members he'd done it, then lie and say you wanted to quit.

If it sounds incredible that all of this could be going on in what is The Satanic Temple's Oldest Continuous Chapter™, you may want to go peruse some of the group photos from years past. The world is full of coincidences, but the fact that very few of people continue to show up year after year makes sense when you notice that a lot of those people who show up every year really like to make excuses for police brutality, disrespect trans people, and/or care more about protecting hierarchy of an organization than protecting the people who make up that organization.

TST WA is volunteers. When you treat people like shit, they'll leave. So, literally, hundreds of people have. And those that remain and who cling on to leadership are baffled why in the world no one sticks around or why they have to keep kicking people out who read the Seven Tenets and the sales pitch of the tenets and want to actually follow through on pursuing justice ahead of laws or institutions without understanding what Satanism is really about: making sure that LG Doug and Malcolm Jarry / Cevin Soling get to keep wetting their beaks in Salem without actually stirring up too much trouble.

I'll make a separate post about LG Doug and his history of virulent antisemitism, defense of literal spouse-beating Neo-Nazis, and weird coziness with the alt-right in general. There's a ton of documentation out there already, and to a lesser extent MJ Cevin's defense of school segregation, being interviewed by white supremacist Stegan Moleneaux a couple of times, and making a documentary about trying to fulfill a prophecy of a cargo cult because they're so easy to control. (No, really: <https://www.imdb.com/title/tt5465690/>).

But until recently, a lot of us who worked very hard thought maybe we were getting one over on the Lords of Salem by taking their progressive grift and taking it sincerely instead of cynically to be able to help people. What we learned instead was that actually trying to live up to principles like the #SixthTenet ("People are fallible. If one makes a mistake, one should do one's best to rectify it and resolve any harm that might have been caused.") could lead to a member of five years being kicked out without warning for saying in a Facebook comment that someone deserved an apology. We learned that you could be kicked out for being cc'd on an email. And we learned that you could be kicked out for dating someone that was cc'd on an email.

We also learned that, wouldn't you know it "petty organizational autocracy" and "rigid centralized authority" is actually the entire business plan of TST, as helpfully drawn for us all by chapter head Siri Sanguine and then confirmed with a flowchart afterward.

We learned that all of the problems we thought we were trying to fix were features, not bugs, of the structure, using volunteer labor and talent to funnel resources toward people so they could get nudes sent to them on Twitter and fuss about not getting a Blue Checkmark, lose every legal case they take to court, and launch an internet TV service that would probably already pivoted to goth aesthetic porn if coronavirus hadn't made that less feasible.

Anyway, here we are. It's Friday night. The world is ending, we're quarantined, so strap in and read some articles about why The Satanic Temple chooses to suck so bad and can't help but mistreat people who want to be fight unjust hierarchy and arbitrary tyranny.

(I bet they'll try to get in touch with me now.)



Evergreen Memes for Queer Satanic Fiends

March 14 at 9:59 PM ·

This page is no longer affiliated with The Satanic Temple.

Ave Satanas!

I was recently notified that talking about transphobes and ableism was considered not to be relevant to The Satanic Temple's "International Council" in Salem or to the local chapter in Washington State.

So by talking about leftist politics like how "The struggle for justice is an ongoing and necessary pursuit that should prevail over laws and institutions," this page wasn't being Satanic.

Specifically:

"(IC is aware of how badly the allies page is fucking up), isn't worried about being labelled a criminal (and endorses

negative and unrelated leftist politics on TST-affiliated social media). TST WA Allies should be about Satanism. On March 4th, this was told to you and ADJ, but just as recently as two days ago, there is a post about ableism. (this as a post from an individual is great - as TST WA not acceptable)."

So to be clear, this page thinks ableism, misogyny, and racism are superstitions, fascists are bad, transphobes can shut the fuck up, and the only good bootlickers do it for a kink and not because they love making excuses for cops killing people.

No gods, no masters.

Be gay, do crime, hail Satan

52

92 Comments 6 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 1:40 AM ·

"There is a revisionist movement in TST about how and why it was founded: it was founded as a prank by an opportunistic filmmaker hoping to make a mockumentary about "nice" Satanists as a joke."



VILLAGEVOICE.COM

Trolling Hell: Is the Satanic Temple a Prank, the Start of a New Religious Movement — or Both? | The Village Voice

16

10 Comments 2 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:22 AM ·

"Ultimately, what it comes down to for me is I can no longer ignore the obvious evidence that my goals and those of The Satanic Temple have diverged. "



MEDIUM.COM

Why I'm Leaving The Satanic Temple

I've been involved in the New York City chapter of The Satanic Temple for...

44

60 Comments 10 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:24 AM ·

"Over the years, members and chapter heads have requested and proposed the implementation of a gender, sexual, and racial diversity policy to ensure equity within TST leadership and alignment to the mission. The demand was not simply ignored but completely dismissed. The demand was not hollow; there was a clear and pressing need for this policy. While I was part of the organization, I witnessed male members of the organization exploit their position and influence to behave inappropriately and disrespectfully towards women."



MEDIUM.COM

“The Struggle for Justice is Ongoing”

On my departure from The Satanic Temple

12

1 Comment 1 Share

Satanic Washington State - Archived Temple Chapter

March 21 at 12:25 AM ·

"The Los Angeles Chapter of The Satanic Temple is hereby withdrawing from The Satanic Temple. All active members have agreed to this decision."

For all who like and follow The Satanic Temple Los Angeles have come to our events, thank you for all of your support:

The Los Angeles chapter of The Satanic Temple is hereby withdrawing from The Satanic Temple. All active members have agreed to this decision. This decision was reached after months of deliberation in the wake of The Satanic Temple Executive Ministry's decision to pursue a religious discrimination claim against Twitter for temporarily banning Lucien Greaves from their platform and for denying Lucien Greaves blue check verification. Our disappointment with the unilateral decision by Executive Ministries to expend resources pursuing this claim is only compounded by their choice to retain the law firm of

Instagram Post by HeLA: A Satanic Collective • August 4, 2018 at 11:59PM CDT

 via instagram.com

31

12 Comments

Satanic Washington State - Archived Temple Chapter

March 21 at 12:27 AM ·

"It has been almost two years since our schism with TST, yet it was as the tumbling of small stones which precipitates a landslide. Recently a series of dominoes has fallen because of the unchecked hubris of TST's National Council and Doug Messner. The UK Chapter announced its separation from TST merely a week ago now. They were closely followed by the LA Chapter, then Portland Chapter; both of which held deep contempt for Doug's position on white supremacists and the newest wave of neo-Nazism to grip our nation. We have been told by TST insiders with whom we have remained friendly, that these will not be the last to depart... that others have had similar experiences to our own. Their dissatisfaction with the National Council's treatment of their proposals and the unique situations they deal with in their various regions has lead to the realization that the Temple serves mostly as a vehicle for Doug's personal vendettas. Most notable is his longstanding feud with Jason Rapert; a rabid theist in the Arkansas Legislature."



MEDIUM.COM

Rise, Decline, and Fall: My Time in The Satanic Temple and Beyond

12

1 Comment 3 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:29 AM ·

"Mary: I was ignored at first. I was banished and not allowed to speak to anyone else in TST. Doug (Lucien) and I had a falling out. Following that I talked to the attorney to withdraw. He convinced me to stay on board. I still believe in the case, but I don't want TST in my life."



MEDIUM.COM

Mary Doe Speaks: Her Story—The Satanic Temple, a Case Experience

11

1 Share

Satanic Washington State - Archived Temple Chapter

March 21 at 12:36 AM ·

The Satanic Temple managed to clatter into the story. A widely shared [Slate.com](#) article declared confidently, and wrongly, that Missouri's flash-renaissance of abortion access was "thanks to Planned Parenthood and Satanists." (Breitbart carried the error into the realm of fantasy, suggesting Planned Parenthood was "teaming up" with the worshipers of the child-sacrifice-demanding Moloch.)

In reality, the Temple's lawsuits were irrelevant, though the Satanists did their best to spin to the contrary.



Satanic Washington State - Archived Temple Chapter

March 21 at 12:38 AM ·

"I also found it peculiar the Satanic Temple TV Instagram had a post which seemed to promote or glamorize August Sol Invictus; a left hand Path Individual that wants to restart the civil war, and eliminate Jewish individuals. I thought this would be something that needed to be addressed so brought it up to our group admin Ash. The post is still up."



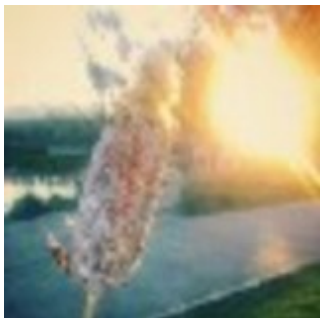
MEDIUM.COM

HOW I WAS EXCOMMUNICATED FROM THE SATANIC TEMPLE... IN A FEW NONTROVERSIAL STEPS.

Satanic Washington State - Archived Temple Chapter

March 21 at 12:40 AM ·

"This is white liberalism with a goat's head: with the lack of diverse representation at the national level, the national initiatives address things that filter through biases of an all white, mostly male, governing body. "



MEDIUM.COM

What Would Satan Do: Knowing When to Pull Anchor and Sail Away.

The cat has been out of the bag for a hot minute now: the members of The Los Angeles chapter of The Satanic Temple (TST) left and formed...

21

2 Comments 6 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:46 AM ·

"It should be noted that TST has done good and legitimate work on these fronts in the past, and credit should be given where it is due. But the unfortunate reality is that, from the top-down, TST is a crypto-fascist organization with some members being outright neo-nazis. Of course, it must be mentioned that TST has some members who aren't neo-nazis or neo-fascists and some are even antifascist; that said, we encourage those who are antifascists within TST to take a hard look at the reality of the organization they're involved with and consider exiting the group."

<https://tridentantifascism.blackblogs.org/tag/doug-misicko/>



31

74 Comments 5 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:50 AM ·

Poke around the original version of the site, cattle skull logo and all. Nine tenets, expressions of appreciation for the apparently literal King of Hell, but of course the merch was always there.

\$130 for a robe. Wild.

^ADJ

--

"We believe that the Family is the most basic core unit of each individual's Circle of Compassion. Broken, dysfunctional families breed broken, dysfunctional individuals who withdraw the reach of their compassion, often to the point of becoming brutal, cruel, and irreparably self-interested. For this reason, the Satanic Temple is firmly committed to supporting traditional, long-recognized Family Values, and we recognize and respect varied individual notions of families."



WEB.ARCHIVE.ORG

The Satanic Temple's Position on Contemporary Issues

The Satanic Temple's Position on Contemporary Issues The Satanic Temple supports the rights of individuals to live their lives as they choose as...

10

1 Comment 2 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:55 AM ·

In addition to being a Holocaust denier and white supremacist slated to be a headline speaker at the "Unite the Right Rally" in Charlottesville, Augustus Invictus' wife says he's also a spousal abuser.

"Last month, a woman who said she was Invictus' wife reported that he held her at gunpoint in front of their children and forced her to accompany him to Jacksonville, Florida, according to documents obtained from the Rock Hill Police Department in South Carolina. She told police that she was able to escape while in Florida and return to South Carolina."

<https://www.splcenter.org/.../augustus-invictus-charged-kidna...>

^ADJ



Lucien Greaves

March 14, 2016 ·

I regret to announce that I have withdrawn from my role as a scheduled speaker at the forthcoming Left Hand Path Consortium to take place in Atlanta early next month. When it was announced that I was to speak at the Consortium, I received a few emails from concerned observers who asked why I would appear at an event alongside a "fascistic" character like Augustus Sol Invictus, who was also scheduled to speak. While I'm not intimately familiar with the works and philosophy of the man in question, I also did not feel that my speaking at the conference constituted an endorsement of his, or anybody else's, point of view. Further, his perspective, from what I know, legitimately falls somewhere on a broad spectrum of recognized "Left Hand Path" philosophies, whether I find that perspective tenable, consistent, and reasonable, or not (just as Fascism legitimately has a place in discussions upon political philosophies without fear that such a discussion lends undue credibility to its contemporary implementation. Do we truly know what we're for if we refuse to discuss what we're against?). From what I know, he's part of a larger dialogue regarding the Left Hand Path that I feel is worth engaging in.

I am not withdrawing from speaking because Invictus was invited to speak, but rather because he was recently dis-invited. Protesters have harangued the organizers, and the organizers have expressed concerns for the security of their attendees were Invictus to remain on the speaker's list. I have no reason to doubt the sincerity of the organizers, however, I feel that the dis-invitation sends a harmful message in support of censorship.

I, too, find some of my speaking events besieged by (religious) protesters, and I hope that civil protest can take place without silencing my voice, or anybody else's.

One might rightly ask if there were any situation in which I might consider not speaking at a conference due to another speaker's point-of-view. Of course, if I were going to a Science conference and there was scheduled a Creationist lecturer, I would likely find the conference hardly worth attending, much less speaking at. This is because Creationism isn't taken seriously by around 100% of credible scientists. If, however, Creationism were, against all reason, taken seriously by some 30% or more of scientists, and the conference were going to contain lectures by Evolutionary Biologists who were to offer a rational view, I would think it the duty of those Evolutionary Biologists to attend, share their knowledge, and confront the poor science with hard empiricism.

I do not think that Invictus's views are in such a disappearingly small minority as to imagine that confronting his opinions give them unwarranted exposure. I think his views are prevalent enough within Left Hand Path communities that it is worth our time to argue them and delineate how and where we differ in the Satanic Reformation of The Satanic Temple.

It's easy to stand up for Free Speech when you are fighting for your own voice, or for the voice of those you agree with. It's a completely different fight and, arguably, your loyalty to Free Speech only means anything at all, when you're willing to fight for the Free Speech of those with whom you disagree.

I'm sorry to those for whom my bowing out will cause any type of inconvenience. Thank you.

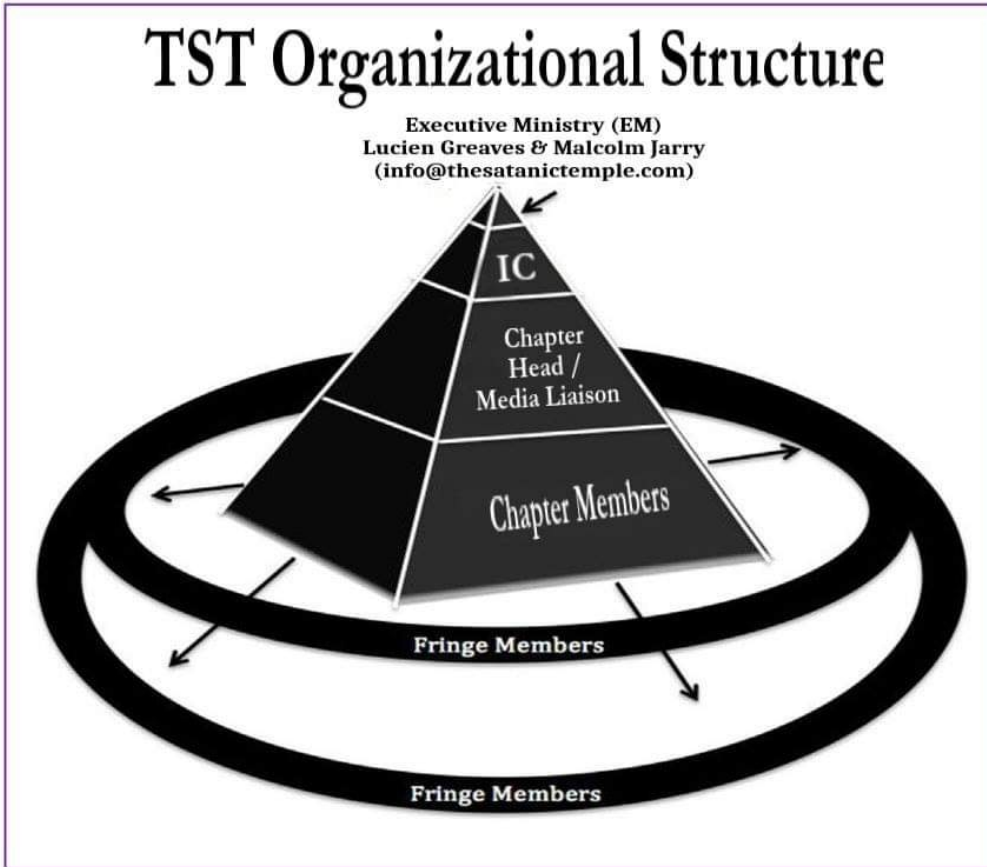
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1 Comment [1 Share](#)

Satanic Washington State - Archived Temple Chapter

March 21 at 1:29 AM ·

Another diagram for better clarity



Evergreen Memes for Queer Satanic Fiends added a new photo to the album: Artisanal Locally Sourced Satanic Memes. March 21 at 1:18 AM ·

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Author

Satanic Washington State - Archived Temple Chapter For those who were wondering, the cover photo is an actual human quote from an actual human person, who for some strange reason wants to go on a #DeusVolt #SatanicCrusade to #FreePalestine

He also "jousts for real", mind you ^ADJ

Satanic Washington State - Archived Temple Chapter

March 21 at 1:55 AM ·

For the record, yes, LG Doug did illustrate a copy of the proto-fascist book "Might Is Right", later cited by the Gilroy Garlic Fest shooter as inspiration (<https://www.stuff.co.nz/.../white-supremacists-satanists-and-...>).

So he wasn't just dabbling in a bit of drunken "Aryan King" Jew-hatred, and no, it's still something LG Doug has never been able to actually speak honestly about, which is why the decision to defend Neo-Nazis and utilize their lawyers in the name of "free speech" rings a bit hollow.

(The deeply antisemitic, racist, and misogynistic book "Might Is Right" by Ragnar Redbeard / Arthur Desmon was also the basis for many parts of Anton LaVey's book "The Satanic Bible, so modern Satanism comes by it at least two-fold.)

^ADJ

- - -

From the official media training guide:

[Don't answer] Yes or no questions.

Question:

"This is a simple yes or no: "Didn't Lucien illustrate a copy of Might is Right. Isn't that a white supremacist book?"

Here's why they're so insidious: They almost always have an obvious answer, and everyone watching the interview knows it. But if you answer with a direct "yes or no," the resulting quote will be awful.

Never say "Yes" or "No" to a question like this. It is always a way to trap yourself.

Let's say you answer the question by saying, "Yes" in any way The resulting news story will almost certainly read, "When asked whether

Lucien Greaves illustrated a White Suprememcist book, the TST spokesperson said 'yes.'"

You don't have to answer on their terms. Instead, say something like: "I can't speak to something that happened almost 20 years ago.

What we do know is that TST is incredibly inclusive and we welcome members from all walks of life."

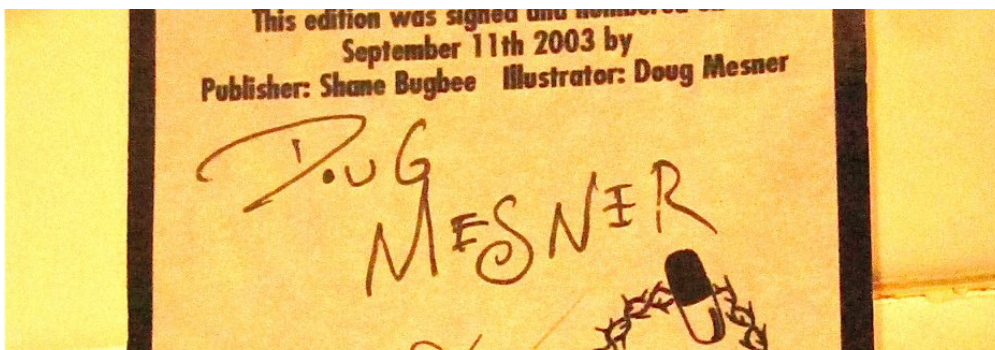
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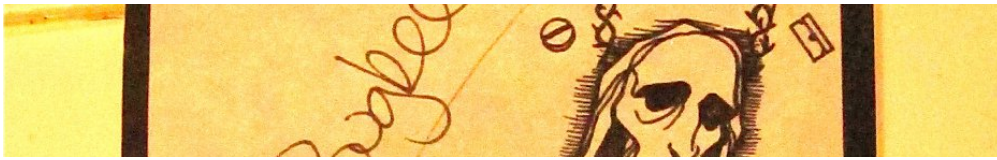
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Satanic Washington State - Archived Temple Chapter

March 21 at 2:07 AM ·

Finally (I think), here's some background on the 2018 departure of many chapters who decided that TST was what it was and never would change, given all of its structure and history.

So, what have we learned?

No matter how much you think your own chapter is different and disconnected from what happens in Salem, it isn't. If you go against the company line, you'll be thwarted, expelled, undermined, or your chapter as a whole will have to leave.

We've learned that authoritarian management structures of volunteers isn't actually a very effective one, especially if you don't remember that eventually, like, within a week, you should remove them from all of the permissions they had to help build and grow the organization. Or even bother to talk to any of them. That this is something that will help membership just shut up and trust your leadership and competence in the future.

We've learned, I hope, that rather than trying to get everyone to sign NDAs and sign away the rights to their photos, you ought to try to treat people decently and, you know, like people. "One should strive to act with compassion and empathy toward all creatures in accordance with reason."

And maybe we've even learned that organizations aren't separable from the people in them. If you have an org and you think it's worth sacrificing respect for the people who are in it or have been in it for some higher cause.

There are still plenty of great people in TST. Good work still is done. And it's never too late to build something new. But, many people before you have tried, and it always seems to come to this if you go too far saying "fascists are bad" or "trans people are people" or even "we need to have a meeting space that's accessible, even if no wheelchair users are members yet."

So be prepared for that.

Ave Satanas, wash your hands, and take care of each other. Good night.

^ADJ



VOX.COM

The Satanic Temple is divided over its leader's decision to hire Alex Jones's lawyer

Greg Thompson and 43 others

37 Comments 14 Shares

Satanic Washington State - Archived Temple Chapter updated

their profile picture.

March 22 at 5:08 PM ·

Satanism should be against fascism:

<https://twitter.com/heresysquad/status/1121923401973559296>

That which will not bend must break, and that which can be destroyed by truth should never be spared its demise.

It is Done.

Hail Satan!

