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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 NATHAN
SULLIVAN IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Nathan Sullivan, declare as follows:

1. I am one of the defendants in the above captioned lawsuit. I make this declaration based on my own personal knowledge. 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.

The Washington Chapter

2. In 2014, I was the co-founder of an autonomous chapter of The Satanic Temple called The Satanic Temple – Seattle. The chapter changed its name to The Satanic

1 Temple-Washington in January of 2020, so for purposes of this Declaration I will refer to the
2 chapter as the “Washington Chapter.”

3 3. In 2014, an individual named Holly Blumenthal, who used the pseudonym
4 “Lilith Starr,” created a Facebook Page for the Washington Chapter to use. This Facebook
5 page came to be known as the “Chapter Page.” The Chapter Page was created for the purpose
6 of disseminating information about the Chapter.

7 4. During my membership with the Washington Chapter, I served in a volunteer
8 capacity in an advisory role in a Washington Chapter group referred to as the Strategy
9 Council. As part of my volunteer work with the Washington Chapter, I learned that the
10 authority for the Washington Chapter rested in the Washington Chapter’s Chapter Head and
11 its Media Liaison. The Washington Chapter’s Chapter Head in the late fall of 2019 through
12 March of 2020 was Leah Garvais, also known as “Siri Sanguine,” and the Media Liaison was
13 Paul Case, also known as “Tarkus Claypool.”

14 5. The Washington Chapter always represented to me that the Chapter Head had
15 authority to make decisions for the Washington Chapter and the Media Liaison had the
16 authority to represent and speak for the Washington Chapter’s interests. This was represented
17 to me by Holly Blumenthal/Lilith Starr, when she served as the previous Chapter Head of the
18 Washington Chapter.

19 6. The idea of turning the Washington Chapter into a corporate entity was
20 discussed in the Washington Chapter for several years, especially within the advisory council.
21 On February 6, 2020, Garvais, as the Washington Chapter’s Chapter Head, implemented that
22 plan and turned the Washington Chapter into a limited liability company (LLC) by creating
23 “Infernal Washington, LLC.” Attached as **Exhibit 1** is a true and correct copy of the
24 Washington State Secretary of State’s Corporations and Charities Filing System’s record of
25 the creation of Infernal Washington, LLC, which I retrieved from the Secretary of State’s
26 Corporation’s and Charities website on August 20, 2024.

1 7. Leah Garvais was the governor of “Infernal Washington, LLC,” which used
2 “TST WA” as a business name.

3 8. On March 3, 2020, Garvais/Siri Sanguine sent an email to the Strategy Council
4 explaining that the Washington Chapter had been converted to an LLC called Infernal
5 Washington, LLC to aid the Chapter in converting to non-profit status. Attached as **Exhibit**
6 **2** is a true and correct copy of Garvais’/Siri Sanguine’s March 3, 2020 email. For the Court’s
7 convenience, I have highlighted the relevant language.

8 **The Washington Chapter Expelled Me While I Was On Leave and Relinquished All**
9 **Interest in the Memes Page**

10 9. On or around December 13, 2019, for personal reasons I decided to take an
11 indefinite leave of absence from my volunteer work with the Washington Chapter, including
12 my work on the Strategy Council. This decision was supported by the Washington Chapter,
13 including Leah Garvais/Siri Sanguine and Paul Case/Tarkus Claypool, who conveyed that
14 they warmly supported my decision to take a leave of absence. Over the next few months, I
15 was contacted only a few times by either of them (for example, to provide login information
16 for an email account used to handle membership applications, which I readily provided) while
17 I focused on personal matters.

18 10. On March 12, 2020, while I was still on leave from my volunteer work with
19 the Washington Chapter, I received a mass email from Leah Garvais/Siri Sanguine to the
20 Washington Chapter. The email stated that TST-WA had been investigating a complaint
21 made by another member, which had apparently been preceded by an argument between other
22 council members. To my shock, the email accused me and others of having been involved in
23 an alleged coalition ostensibly intended to attack and undermine the Washington Chapter’s
24 leadership. The email announced Leah Garvais/Siri Sanguine’s decision to dissolve the
25 committee I had served on and replace it with a smaller, handpicked group.

26 11. On March 14, 2020, Leah Garvais/Siri Sanguine sent another email to the
Washington Chapter reiterating her plan to dissolve the existing committee and create a

1 smaller Strategy Council. A few hours later, at 7:48 pm on March 14, 2020, Leah Garvais/Siri
2 Sanguine sent yet another email to Mickey Powell, a co-defendant in this lawsuit who at the
3 time used the pseudonym Lenore Calavera. UFC lists Mickey Powell in the caption of this
4 case as Mickey Meehan, but Mickey’s legal last name is Powell, so that is the name I will
5 use in this declaration. Garvais/Sanguine alleged that Powell/Calavera had “stolen” a
6 Facebook page she referred to as “TST WA Allies,” which Defendant Johnson had renamed
7 to “Evergreen Memes for Queer Satanic Fiends” (referred to hereinafter as “Memes Page”¹).
8 She also stated that Powell/Lenore Calavera was now banned from The Satanic Temple. I
9 understand that my co-defendant David Johnson has included a true and correct copy of this
10 March 14, 2020 email with his declaration in support of our Motion for Summary Judgment
11 and I incorporate that exhibit herein by reference.

12 12. After Garvais/Sanguine sent her 7:48 pm email, the Washington Chapter
13 leadership decided to relinquish all interest in the Memes Page. At 9:09 pm on March 14,
14 2020, in his capacity as the Washington Chapter’s Media Liaison, Paul Case/Tarkus Claypool
15 sent an email to my co-defendant Powell /Lenore Calavera. Powell shared that email with
16 me. In the email, Paul/Tarkus states he had seen that the name of “TST WA Allies” page had
17 been changed, that Powell/Lenore Calavera and David Johnson were free to use the page (the
18 Memes Page) “free and clear,” and that the Washington Chapter had no interest in reclaiming
19 the page:

20 Hi Lenore,

21 I saw that you made some changes to the TST WA State Allies FB group. I
22 just wanted to let you know that it’s yours free and clear and we’ve no desire
23 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.

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

26 _____
¹ In its motion and pleadings, TST refers to the Memes Page as the “Allies page.”

1 Rock on.

2 Tarkus Claypool
3 Media Liaison, The Satanic Temple of Washington.

4 I understand that my co-defendant, Mickey Powell, has attached a true and correct copy of
5 this email to his declaration, which I incorporate herein by reference. A true and correct copy
6 of this email is also attached as Exhibit 1 to Defendants Amended Answer and Counterclaim,
7 Sub. No. 19.

8 13. The following day, on March 15, 2020, Leah Garvais/Siri Sanguine, Paul
9 Case/Tarkus Claypool, and other remaining advisors of the Washington Chapter held an
10 online Washington Chapter town hall meeting over Zoom, attempting to provide an
11 explanation to the rest of the members of the Washington Chapter as to why so many
12 members had suddenly been removed. I understand that my co-Defendant, David Johnson
13 has provided a true and correct recording of this Zoom meeting with his declaration. During
14 the recorded town hall meeting, Paul Case/Tarkus Claypool again states that the Washington
15 Chapter did not want the Memes Page and that he wished Mickey Powell and David Johnson
16 well in using the Memes Page in the future:

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

26 Paul Case/Tarkus Claypool's statement is at approximate timestamp 1:20:35 on the video.

14. I am aware that in their Complaint in this lawsuit, UFC points to a comment I
made in a Facebook post on March 15, 2020, in which I say in a response to another individual
that we "stole" the Memes Page. At the time I made that statement, it was meant to be a

1 joke—a glib tongue-in-cheek comment as the Washington Chapter had already expressly let
2 us know that we could use the Memes Page “free and clear.” By being glib and using the
3 word “stole,” I was merely trying to express that I was upset at the events and also to celebrate
4 the fact that the Memes Page would no longer be affiliated with the Washington Chapter. At
5 that time, because the Washington Chapter had twice represented that it had no interest in the
6 page and we could use it “free and clear,” it was clear to me, to my co-defendants, and to
7 anyone who saw the Media Liaison’s and Chapter Head’s statement at the town hall meeting
8 that we were free to use the Memes Page. Moreover, at the time of my statement I had been
9 entirely uninvolved with the administration of the Memes Page, and had no role or
10 foreknowledge of the decision to sever it from the Washington Chapter. At the time of my
11 statement, my only involvement in the Memes Page was being aware that the Washington
12 Chapter had relinquished all interest in the page. We have relied on the Washington Chapter’s
13 express statements and have done exactly as they said we could do – we have used the Memes
14 Page for our own purposes.

15 15. Consistent with telling us that we could use the Memes Page “free and clear,”
16 at no point since making those statements has the Washington Chapter ever asked us to give
17 it control of the Memes Page.

18 **Alleged Documents In My Possession**

19 16. As a volunteer with the Washington Chapter for approximately six years, I
20 obtained a small smattering of random documents that were left over as a residue of my
21 volunteer work. While I served as a volunteer for the Washington Chapter, it stored its
22 documents in shared email accounts and a shared online Google drive account. I have never
23 had exclusive control over those shared online sources or prevented anyone from the
24 Washington Chapter from accessing those online sources of documents.

25 17. To the best of my knowledge, the few hard copy documents in my possession
26 all relate to the Washington Chapter and its predecessor, the Seattle Chapter.

1 18. I have never had any interaction with the plaintiff, United Federation of
2 Churches (“UFC”) outside of this litigation. To the best of my knowledge, I do not possess
3 any documents that originated from or belong to UFC.

4 19. The few miscellaneous hard copy documents that I have in my possession
5 from my time as a volunteer with the Washington Chapter are random, outdated, and appear
6 to be of no value. I did not intentionally retain any documents. They merely happened to be
7 in my possession when I was abruptly expelled from the Washington Chapter.

8 20. At no point has anyone from the Washington Chapter asked me what
9 documents I have in my possession.

10 21. At no point has anyone from the Washington Chapter asked me to return
11 documents to the Washington Chapter.

12 22. Other than searching for the miscellaneous Washington Chapter documents in
13 my possession because of this lawsuit, I have not otherwise used any Washington Chapter
14 documents in my possession for any purpose since I was expelled from the Washington
15 Chapter in March of 2020.

16 23. The federal lawsuit by UFC was the first time I was accused of possessing
17 documents, with that accusation coming from UFC and not the Washington Chapter.

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

20
21 Executed in Seattle, Washington on this 22 day of August 2024.

22 *Nathan Sullivan*

23 Nathan Sullivan (Aug 22, 2024 19:59 PDT)

24 Nathan Sullivan

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 23rd day of August, 2024 in Seattle, Washington.

17
18 /s/ Janet C. Fischer
19 Janet C. Fischer
20 Paralegal
21
22
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EXHIBIT 1

BUSINESS INFORMATION

Business Name:

INFERNAL WASHINGTON LLC

UBI Number:

604 580 616

Business Type:

WA LIMITED LIABILITY COMPANY

Business Status:

VOLUNTARILY DISSOLVED

Principal Office Street Address:

522 W RIVERSIDE AVE STE N, SPOKANE, WA, 99201-0580, UNITED STATES

Principal Office Mailing Address:

522 W RIVERSIDE AVE STE N, SPOKANE, WA, 99201-0580, UNITED STATES

Expiration Date:

02/28/2023

Jurisdiction:

UNITED STATES, WASHINGTON

Formation/ Registration Date:

02/06/2020

Period of Duration:

PERPETUAL

Inactive Date:

07/28/2022

Nature of Business:

ANY LAWFUL PURPOSE, THE PURPOSE OF ORGANIZATION INCLUDES, BUT IS NOT LIMITED TO: SUPPORTING THE RELIGIOUS AND COMMUNITY SERVICES OF THE WA STATE CHAPTER OF THE SATANIC TEMPLE

REGISTERED AGENT INFORMATION

Registered Agent Name:

NORTHWEST REGISTERED AGENT, LLC

Street Address:

522 W RIVERSIDE AVE STE N, SPOKANE, WA, 99201-0580, UNITED STATES

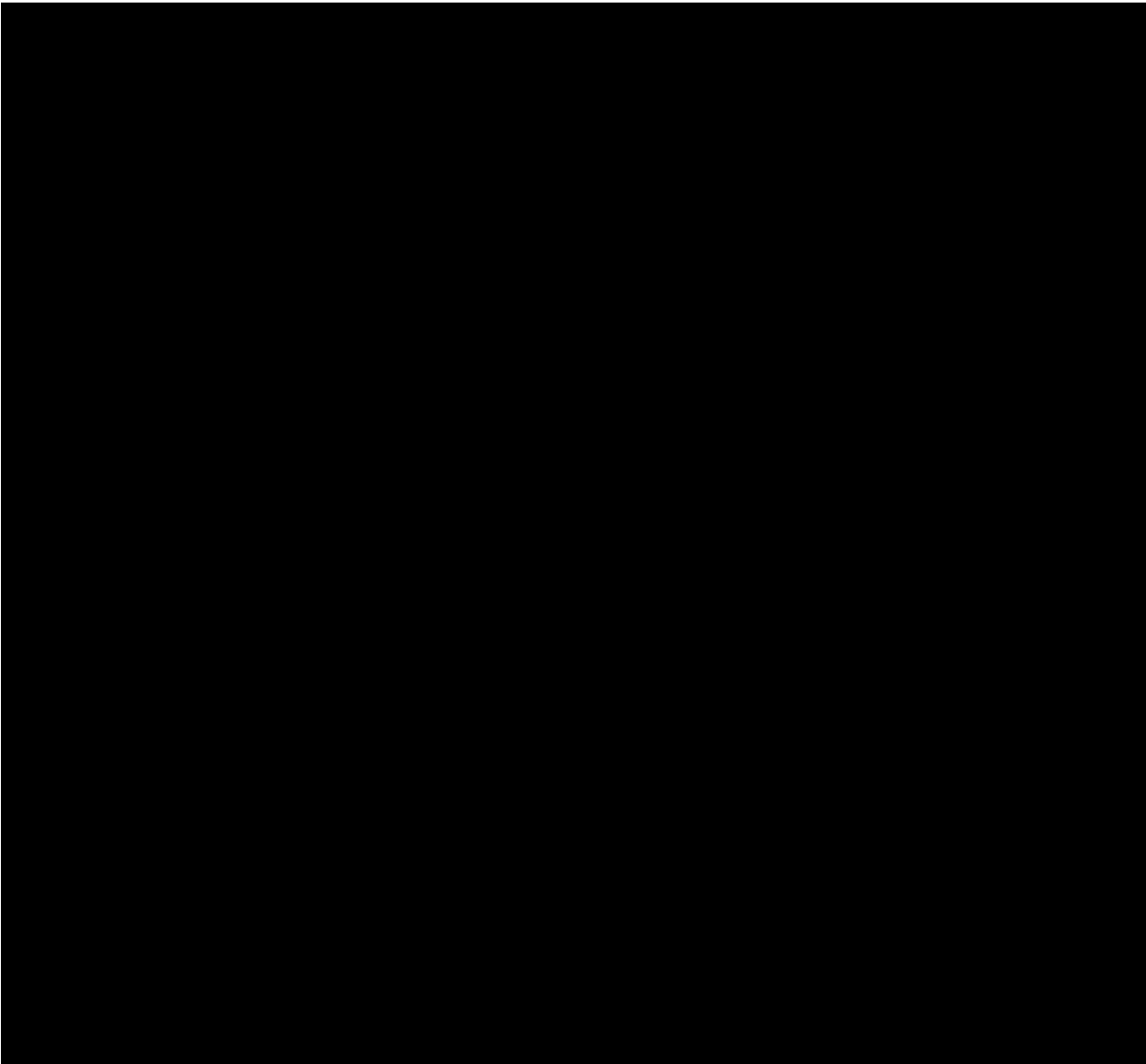
Mailing Address:

522 W RIVERSIDE AVE STE N, SPOKANE, WA, 99201-0580, UNITED STATES

GOVERNORS

Title	Governors Type	Entity Name	First Name	Last Name
GOVERNOR	INDIVIDUAL		LEAH	GARVAIS

EXHIBIT 2



From: **Azazel Schempp** <azazel.schempp@gmail.com>
Date: Mon, Aug 19, 2024, 11:41 AM
Subject: Fwd: [tst-strategy-council] Notes from Sunday's meeting
To: <sullivan.nathan.p@gmail.com>

----- Forwarded message -----

From: **Siri Sanguine** <sirisanguine@gmail.com>
Date: Tue, Mar 3, 2020, 9:10 AM
Subject: [tst-strategy-council] Notes from Sunday's meeting
To: TST Strategy Council <tst-strategy-council@googlegroups.com>

Welp, the technology fail is my fault - I didn't double check that the meeting was set to record 'cuz that is supposed to be my standard setting & there is no zoom meeting recording from the latest Legion meeting - sorry y'all. So instead here is an overview of what was discussed:

1. P4P action: Tarkus, Thomasin, and Angel reviewed the action in a step-by-step document which has since been shared with the chapter. Finalized makeup and hoods up with fashion tape as the look for participants and members. Vox was nominated and accepted the role of understudy to Angel just in case. Siri has since purchased the fashion tape for use day of. Final Dress rehearsal has been scheduled for WED 3/4 @ 6:00 pm @ Cowan Park and has been sent out to all ritual members. Siri will boost current FB event, BZA will create new Ad to be posted up via all social media ASAP.

2. Financial report reviewed. Siri has formed an LLC for us (Infernal Washington LLC) and Thomasin will be setting up our bookkeeping once we're ready to transfer the banking. This will aid us to smoothly convert to non-profit status when IC finally passes down the 501c3 umbrella tools.

3. Blood drive update - Tacoma and Bellingham are fully staffed, Seattle has barely staffed it's drive and seem to have very little buy-in from membership. All Legion members need to help promote the event to members and beyond. Bonus- Bloodworks NW is giving away 10 cars to folx who donate before 3/17 so everyone who donates at our event will automatically be entered in the drawing. Also discussed adding a raffle of our TST Seattle swag (coffee cups and shot glasses) to help promote event. Please encourage all members to attend even if they cannot donate - we want a fun party atmosphere so bring music, games, etc

3. Update on Osiris situation - He was removed during the clean up of the Google Drive and Discord based on his statement that he "wants nothing to do with TST". Tarkus has started an email conversation regarding his membership, however more followup is needed. Osiris stated that he has no faith in the current leadership so we want to figure out why he wants back in - further interview is needed but has been tabled until after P4P. Some discussion of the heated discussion on discord & the unfortunate use of inflammatory word choices - please attempt to be more considerate with each other to avoid unnecessary hurt or conflict BUT do call each other out and bring up the hard topics! **NEW Standard Operating Procedure: In urgent matters of safety Senior Leadership will act & then inform Legion about removal, for other removals Legion will be consulted PRIOR to taking action.**

5. Website: Char will set up redirects for a number of URL options and help with the back-end needs. BZA will take on the front-end design utilizing the WIX tools to update our aesthetics as he can in consultation with Leah F. who has been swamped with their job change at their normal work.

4. Topic for April's meeting - Is our current Guild Structure working for or against us? How can we improve or outright change our leadership structure for the better? Please bring your brainstorming ideas and suggestions to the April Legion meeting.

I am sure I missed some stuff, but that's the major points.

Thx,

Siri

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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 sirsanguine@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. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

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You received this message because you are subscribed to the Google Groups "TSTWA-Legion" group. To unsubscribe from this group and stop receiving emails from it, send an email to tst-strategy-council+unsubscribe@googlegroups.com.

To view this discussion on the web visit https://groups.google.com/d/msgid/tst-strategy-council/CADa2PyyoPb8vtyAZ6tukm7EKUhp_dE%2B2Wx6YMZxe1L7KPXUJQ%40mail.gmail.com.