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SUPERIOR COURT OF WASHINGTON
FOR KING COUNTY

United Federation of Churches, LLC (dba
"The Satanic Temple"))

Plaintiff,)

v.)

David Alan Johnson (AKA "ADJ"),)
Leah Fishbaugh, Mickey Meehan, and)
Nathan Sullivan,)

Defendants.)

Case No. 23-2-06120-9 SEA

AMENDED COMPLAINT FOR
DAMAGES AND INJUNCTIVE
RELIEF

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

I. PREAMBLE

1. This case is about two hacked social media accounts and failed attempts at
hacking a different 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."

2. Plaintiff brought suit in the United States District Court for the Western District
of Washington on April 3, 2020. The below claims for tortious interference with economic
relations and trespass to chattel / conversion survived. *United Federation of Churches, LLC v.*

1 *Johnson*, 598 F.Supp.3d 1084 (W.D.Wash., 2022). However, following a subsequent motion to
2 dismiss for lack of a sufficient amount in controversy, the District Court dismissed without
3 prejudice. *United Federation of Churches, LLC v. Johnson*, 2023 WL 121418 (W.D.Wash.,
4 2023).

5 3. Upon a good faith conference with opposing counsel, the below claim for breach
6 of fiduciary duty is clarified that it arises out of Defendants' wrongful detention of profits raised
7 by Defendants' use of Plaintiff's property (which was the subject matter of the agency). The
8 profits were obtained within three years of the original complaint.

9 4. This amendment removes vestigial facts which pertained to the federal claims.

10 II. JURISDICTION AND VENUE

11 5. This Court has subject matter jurisdiction. RCW 2.08.010.

12 6. Venue properly lies with this Court. RCW 4.12.025.

13 7. This Court has personal jurisdiction over all defendants as all are Washington
14 residents residing in King County.

15 III. PARTIES

16 8. TST is a religious organization. See generally "About us," available at
17 <https://www.thesatanictemple.org/about-us.html>

18 9. TST subscribes and advances seven fundamental tenets:

- 19 (1) One should strive to act with compassion and empathy toward all creatures
20 in accordance with reason.
- 21 (2) The struggle for justice is an ongoing and necessary pursuit that should
22 prevail over laws and institutions.
- 23 (3) One's body is inviolable, subject to one's own will alone.
- 24 (4) The freedoms of others should be respected, including the freedom to
25 offend. To willfully and unjustly encroach upon the freedoms of another is
26 to forgo one's own.
- (5) Beliefs should conform to one's best scientific understanding of the world.
One should take care never to distort scientific facts to fit one's beliefs.

1 (6) People are fallible. If one makes a mistake, one should do one's best to
2 rectify it and resolve any harm that might have been caused.

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

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

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

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

13 12. TST has adherents in each of the 50 States, importantly to include Washington.
14 At the relevant time, TST was organized at local levels in "Chapters," which are largely
15 autonomous but are subject to centralized control to ensure faithfulness to organizational
16 principles and purposes.

17 13. TST had a Washington State Chapter which, at the relevant time, was led by two
18 individuals: one serving as Chapterhead and the other serving as Media Liason.

19 14. The Chapterhead has administrative authority over the Washington Chapter and,
20 until March 12, 2020, was assisted by an advisory council.

21 15. The Media Liaison promotes the Washington Chapter's activities to the general
22 public. The Media Liaison never had authority to transfer TST's property or waive TST's claims.

23 16. Defendants were councilors on the advisory council to the Chapterhead. On
24 March 12, 2020, the advisory council consisted of 16 positions, of which Defendants held four.
25 Attendant to their positions on the council, Defendants were entrusted with management of the
26 Chapter's social media presence along with the other councilors.

17. On March 12, 2020, Defendants were removed from their positions on the council

1 because of interpersonal conflicts with Chapter leadership and other councilors.

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

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

13 20. Defendant Leah Fishbaugh is an associate of Johnson, and a former associate of
14 TST. Fishbaugh aided and abetted the hacking and is currently enjoying administrative privileges
15 to TST's Allies page in contravention of TST's will. Fishbaugh also lives in Seattle.

16 21. Defendant Mickey Meehan is an associate of Johnson, and a former associate of
17 TST. Meehan aided and abetted the hacking and is currently enjoying administrative privileges
18 to TST's Allies page in contravention of TST's will. Meehan also lives in Seattle.

19 **IV. FACTUAL BACKGROUND**

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

23 23. At the relevant time, Facebook was the Washington Chapter's primary platform of
24 communicating with its membership.

25 24. In October of 2014, the Washington Chapter business page was created exclusively
26 for the benefit of TST in its efforts to disseminate information for what was then the Seattle Chapter.

1 See **Exhibit 1** (Chapter page history).

2 25. Over the next several years, the Washington Chapter grew the Facebook page to an
3 audience exceeding 17,000 followers. Ibid.

4 26. In September 2018, the Washington Chapter created a secondary Facebook page,
5 named “TST WA Allies,” to facilitate communications with individuals who were interested in TST
6 but did not want to identify as a member.

7 27. Defendants, each, were entrusted with administrative rights to the above-described
8 social media accounts, subject to the requirements of a written Code of Conduct.

9 28. Defendant Sullivan has exclusive access of the original copies of each Defendants’
10 signature, acknowledging and agreeing to be bound by the above terms in return for access to the
11 social media accounts.

12 29. On information and belief, Sullivan still has exclusive access to these documents,
13 among other highly sensitive materials including membership listings, internal policies and
14 procedures, and meeting notes.

15 30. Defendants were each aware of the Code of Conduct because it served as a source
16 of friction leading up to the events giving rise to this litigation. For example, on March 2, 2020,
17 Johnson shared the following post on the Allies page outside of his authority:

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31. 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.

32. Between March 2-12, 2020, TST’s Washington leadership became increasingly frustrated with Defendants’ organizational failures and inflammation of interpersonal conflicts within the advisory council. More particularly, Defendants:

- (1) Repeatedly operated TST’s social media to endorse leftist politics as opposed to Satanism, despite repeated reminders that this was unacceptable;
- (2) Failed to attend a particular meeting to address the above issue; and
- (3) Failed to initiate, conceive, or execute any publicity for the Washington Chapter’s Prayer for Plurality event, which was a matter of organizational

1 significance.

2 33. On March 12, 2020, TST's Washington leadership removed Defendants from their
3 advisory positions.

4 34. Defendants' positions on the advisory council entailed the permission to manage the
5 Chapter's social media activity. By removing Defendants from their advisory positions, the
6 Washington Chapter leadership revoked Defendants' permission to manage the Chapter's social
7 media activity and revoked Defendants' authorization to serve as custodians of records.

8 35. At some point between March 12 and March 14, 2020, Defendants entered into an
9 unlawful agreement to misappropriate and shut down substantially all the internet presence of TST's
10 Washington Chapter toward the twin goals of forming a competitor organization and harming TST.

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



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26 37. Meehan, in conjunction with the other named Defendants, then began posting

1 material in violation of the Code of Conduct and in disregard of the revocation of authority entailed
2 in being removed from the position on the advisory council.

3 38. Sullivan explicitly recognized that Defendants had no authorization to access the
4 Allies page. On March 15, 2020, Sullivan publicly stated that he was no longer affiliated with TST.
5 **Exhibit 2.** And, referring to the Allies page: “we have a meme page here that we stole from TST:
6 Evergreen Memes for Queer Satanic Fiends.” **Id.** at pp. 3-4.

7 39. Following Meehan’s usurpation of the Allies page, the Washington Chapterhead
8 removed all defendants from administrative access privileges to the Chapter Page.

9 40. On March 20, 2020, despite having a subjective awareness that he no longer had
10 authorization to use TST’s Facebook Chapter page, Johnson took control of the Chapter page by
11 removing all TST-approved administrators, modifying the cover page without approval, and posting
12 a three-page manifesto. The manifesto, as of the original complaint, is attached and incorporated as
13 **Exhibit 3** (the archive reflects Central time).

14 41. Broadly, the manifesto levied false claims that TST leadership is cozy with the alt-
15 right, are white supremacists, are generally insufficiently leftist for Johnson’s preference, and does
16 not conform to Johnson’s impression of Satanism. Posting the manifesto exceeded Johnson’s grant
17 of authority as defined in the Code of Conduct, disregarded the revocation of authority entailed in
18 being removed from the position on the advisory council, and disregarded the explicit revocation of
19 authority entailed in having his administrative access to the Chapter page removed.

20 42. On March 20 at 11:29 pm, the Chapter’s media liaison emailed Johnson a cease and
21 desist instruction, stating “I’d like you to return the Facebook page back to us please.” **Exhibit 4**

22 43. Johnson ignored the email and did not return the Facebook page to TST.

23 44. Instead, Johnson spent the next couple of days posting links and commentary from
24 the Chapter page, all with the general, and false, theme that TST leaders are incompetent fascists.

25 45. On March 22 at 3:08 pm, Johnson modified the name of the Chapter page from “The
26 Satanic Temple Washington” to “Satanic Washington State – Archived Temple Chapter” and

1 modified the profile picture to replace TST-specific iconography with “antifa” symbolism. These
2 modifications disregarded the revocation of authority entailed in being removed from the position
3 on the advisory council, disregarded the explicit revocation of authorization entailed in having his
4 social media administrative access revoked, and disregarded the explicit cease and desist demands
5 referenced in ¶ 42.

6 46. By operation of his removal as a member of the advisory council, Sullivan’s control
7 over original signed copies of membership agreements, and cloud-based trade secret documentation,
8 became unauthorized. Of importance to this action, Sullivan had, and continues to have, exclusive
9 control over membership enrollment and application documents and background check documents
10 for prospective new members (to exclude felons from membership), both of which are paper
11 documents. Sullivan also had, and continues to have, an electronic database of the TST-Washington
12 membership, as well as their contact information. Defendants have since used this contact
13 information to harass TST’s membership through the internet.

14 47. As of the original complaint, TST’s Washington Chapter lost between 20 and 30
15 members because of Johnson’s false claims published to the Chapter page. The precise number
16 since then is currently unknown.

17 48. Facebook refused to correct the matter, mislabeling the issue as a “Page admin
18 issue” to the exclusion of “infringements of your legal rights.”

19 49. On March 23, 2020, Matthew Kezhaya (TST’s outside general counsel) issued a
20 demand letter to Johnson which threatened this very litigation unless he “permanently relinquish[ed]
21 full control” of the Chapter page “by 4:00 PM Central Time on March 24, 2020.” **Exhibit 5.**

22 50. Johnson ignored the letter and, together with his co-Defendants, continued to
23 maintain exclusive control over the Chapter page. In so doing, Johnson and his co-Defendants
24 disregarded the revocation of authority entailed in being removed from their positions on the
25 advisory council, disregarded the explicit revocation of authorization entailed in having their social
26 media administrative access revoked, and disregarded the explicit cease and desist demands

1 referenced in ¶¶ 42 and 49.

2 51. Defendants simply ignored all communications, from counsel and TST alike.

3 52. TST was able to recover the Chapter page through Facebook in or around June 2020.

4 53. On an ongoing basis since March 2020, Defendants have continually exercised
5 dominion and control over the Allies page despite repeated demands by TST to return the same.

6 **Exhibit 6.**

7 54. Beginning in mid-April 2020, Defendants have used the Allies page to raise funds
8 for the defense of this action by publicly calling for donations, selling competitor merchandise, and
9 more generally to publish statements adverse to TST's interests on TST's website. As former agents
10 of TST who were entrusted with managing TST's website, they are liable to return all profits arising
11 out of their use of TST's website. They are further liable for the improved value of the Allies page
12 at the time of judgment.

13 **III. CAUSES OF ACTION**

14 **Count 1:**

15 **Tortious interference**

16 55. TST re-alleges and incorporates by reference the foregoing allegations.

17 56. TST maintains ongoing business relationships with Facebook, importantly to
18 include the Chapter page and Allies page.

19 57. There is an economic benefit for TST in having a ubiquitous platform to interact
20 with members and prospective members in the convenience of their homes and wherever they carry
21 their smartphones. Namely, with increased awareness comes increased membership and donations
22 which create a positive feedback loop.

23 58. At the relevant time, Defendants had subjective knowledge of the business
24 relationship between Facebook and TST. Facebook is well-known as a separate company from the
25 organizations that have profiles on its proprietary network.

26 59. Defendants intentionally and with an improper motive acted to sever the Washington

1 Chapter's relationships with Facebook by misappropriating the two websites for the twin goals of
2 harming the Washington Chapter, and TST at large, and creating a competitor organization.

3 60. Defendants were aware that the social media accounts had an economic value to
4 TST. The social media accounts were the primary means for TST to communicate with the general
5 public and TST's supporters and Defendants personally used those social media accounts for the
6 purpose of assisting TST in creating the kind of communications that help to foster the kind of
7 relationship which results in charitable donations to support TST's organizational purposes. By
8 depriving TST of its social media accounts, Defendants intended to diminish those donations and
9 divert donations to their competitor organization, provisionally named "The Satanic Temple 2:
10 Electric Boogaloo." Exhibit 2 at p. 4.

11 61. Defendants' interference with TST's social media presence was wrongful beyond
12 the interference itself. Defendants abused TST's social media presence as a channel to publish
13 derogatory messages directly to TST's intended audience and to falsely suggest that the Washington
14 Chapter was replaced by Defendants' competitor organization. The contemplated and intentional
15 purpose of so doing was to diminish TST's membership and donation base.

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

19 63. Based on the foregoing, TST is entitled to compensatory damages for the temporary
20 interference of the Chapter page and for the ongoing interference of the Allies page, injunctive relief
21 to return the Allies page, and a permanent injunction to refrain from accessing any of TST's
22 property.

23 **Count 2:**

24 **Trespass to chattels**

25 64. TST re-alleges and incorporates by reference the foregoing allegations.

26 65. Trespass to chattels is the intentional interference with a party's personal property

1 without justification that deprives the owner of possession or use. *G&G Closed Cir. Events, LLC v.*
2 *Single, LLC*, No. C18-1295JLR, 2020 WL 5815050, at *4 (W.D. Wash. Sept. 30, 2020) (citing
3 *Restatement (Second) of Torts* § 217).

4 66. The first chattel at issue is TST’s possessory interest in Facebook’s computer
5 network which manifested through the internet as the Allies page.

6 67. Defendants intentionally dispossessed TST of the Allies page by logging in to
7 Facebook’s computer network and replacing Defendants for TST’s authorized administrators of the
8 pages.

9 68. Defendants had no justification to remove all of TST’s approved administrators or
10 to usurp the Allies page. Albeit not required for a liability judgment, Defendants subjectively
11 understood that they had no ownership interest in the Allies page by publicly admitting they “stole”
12 it from TST. Exhibit 2, at pp. 3-4.

13 69. Although Washington has not squarely addressed the question, California courts
14 have resolved that dispossession of access to a computer system is an actionable trespass to chattels.
15 *See Synopsys, Inc. v. Ubiquiti Networks, Inc.*, 313 F. Supp. 3d 1056, 1080 (N.D. Cal. 2018) and *Intel*
16 *Corp. v. Hamidi*, 30 Cal. 4th 1342, 1351, 71 P.3d 296, 303 (2003); see also *JLM Couture, Inc. v.*
17 *Gutman*, No. 20 CV 10575-LTS-SLC, 2021 WL 827749 (S.D.N.Y. Mar. 4, 2021) (granting a
18 preliminary injunction to restrain a former employee’s use of an employer’s social media accounts
19 post-termination—albeit while explicitly declining to address the ultimate trespass to chattel and
20 conversion claims, *id.* at *19).

21 70. The second chattel at issue is TST’s membership-related documents, whether in
22 physical or electronic format.

23 71. Defendants, particularly Sullivan, intentionally dispossessed TST of these
24 membership-related documents by maintaining exclusive control over the documents despite the
25 termination of Sullivan’s role as custodian of records.

26 72. Based on the foregoing, TST is entitled to injunctive relief in the form of a permanent

1 injunction enjoining Defendants from accessing any of TST’s Facebook pages under threat of
2 contempt, an order to return TST’s membership related documents and destroy any copies thereof,
3 and costs and attorney’s fees to be computed after entry of the decree.

4 **Count 3:**

5 **Conversion**

6 73. TST re-alleges and incorporates by reference the foregoing allegations.

7 74. Conversion is the act of “willfully interfering with any chattel, without lawful
8 justification, whereby any person entitled thereto is deprived of the possession of it. *In re Mastro*,
9 No. 09-16841-MLB, 2017 WL 2889659, at *13 (Bankr. W.D. Wash. July 6, 2017) (citing *Public*
10 *Util. Dist. No. 1 v. Wash. Public Power Supply Sys.*, 104 Wn.2d 353, 378 (Wash. 1985)).

11 75. “Willful” means “intentional” and does not require a showing of “malice.” *Id.*
12 (citing *Schilling v. Radio Holdings, Inc.*, 136 Wn.2d 152, 159–60 (Wash. 1998)) (citations omitted).

13 76. Malicious intent is not an element of conversion and good faith is not a defense. *Id.*
14 (citing *Brown v. Brown*, 157 Wn. App. 803, 818, (2010)).

15 77. Trespass to chattels differs from conversion as a matter of degree. See *Intel Corp.*
16 *v. Hamidi*, 30 Cal. 4th 1342, 1350, 71 P.3d 296, 302 (2003) (“Dubbed by Prosser the ‘little brother
17 of conversion,’ the tort of trespass to chattels allows recovery for interferences with possession of
18 personal property ‘not sufficiently important to be classed as conversion, and so to compel the
19 defendant to pay the full value of the thing with which he has interfered’); see also *Damiano v. Lind*,
20 163 Wash. App. 1017 at *5 (2011) (“Trespass to chattels is something less than a conversion.”)
21 (unpublished opinion, but the Court “may consider unpublished state decisions, even though such
22 opinions have no precedential value.” *Emps. Ins. of Wausau v. Granite State Ins. Co.*, 330 F.3d
23 1214, 1220 (9th Cir. 2003)).

24 78. The same chattels are at issue in this Conversion claim as the Trespass to Chattels
25 claim (*i.e.*, the Allies page and the membership documents). This conversion claim is included with
26 the trespass to chattels claim because Washington courts tend to discuss the two claims in tandem.

1 *E.g. Damiano, above; see also Sexton v. Brown*, 147 Wash. App. 1005 (2008).

2 **Count 4:**

3 **Breach of fiduciary duty**

4 79. Not only is TST entitled to the value of the Allies page at the time of the conversion,
5 TST is also entitled to the improved value of the Allies page at the time of judgment because
6 Defendants were TST's agents who breached the fiduciary duty of loyalty by profiting off of TST's
7 property. *Restatement (Second) of Torts* § 927, cmt. f, j (1979); *Straka Trucking, Inc. v. Est. of*
8 *Peterson*, 98 Wash. App. 209, 211, 989 P.2d 1181, 1183 (1999); *Crawford-Brunt v. Kruskall*, 489
9 F. Supp. 3d 1, 3 (D. Mass. 2020); *see also Restatement (Second) of Torts* § 931(a), cmt. b and d;
10 *Howard v. Edgren*, 62 Wash. 2d 884, 886, 385 P.2d 41, 42 (1963).

11 80. Defendants have been profiting from their improper use the Allies pages since mid-
12 April 2020 by using it to direct internet traffic to their competitor merchandise store, to their
13 competitor donations platform, and

14 **IV. PRAYER FOR RELIEF**

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

17 (1) Defendants shall, jointly and severally, immediately return to counsel for Plaintiff
18 under threat of contempt full control of the Allies page, all TST materials, whether in paper or
19 electronic format, including without limitation: all signed agreements, all membership listings, all
20 internal policies and procedures, all governance documentation, any branding materials, and any
21 other document created by or for the benefit of TST.

22 (2) Defendants shall, jointly and severally, permanently refrain from accessing any
23 administrative function of any internet-based medium, including without limitation any social media
24 accounts, email accounts, or document storage accounts, created by or for the benefit of TST.

25 (3) Defendants shall, jointly and severally, pay compensatory and punitive damages to
26 Plaintiff in an amount to be determined at trial.

1 (4) Defendants shall, jointly and severally, pay costs and attorney's fees to Plaintiff in
2 an amount to be determined after trial

3 (5) Defendants shall, jointly and severally, pay prejudgment and postjudgment interest
4 until paid in full.

5
6 Respectfully submitted this 30th day of May, 2023.

7 LYBECK PEDREIRA & JUSTUS, PLLC

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20 **Exhibit list**

- 21 1. Chapter page history
22 2. Defendants' admission they "stole" the Allies page
23 3. Johnson's manifesto
24 4. First cease and desist demand
25 5. Second cease and desist demand
26 6. Allies page history

EXHIBIT "1"

Exhibit 1


Chapter 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 "2"



Nathan Von Sullivan

March 15 ·

Well, apparently I'm no longer affiliated with TST-WA. I always knew that there was an expiration date on my membership, of course, but somehow I kinda expected it to go out with something better than being accused as a co-conspirator of attacking leadership, on the basis of conversations I was no part of and hadn't even seen until after they had resolved (and of course, cannot see any records of now); on the basis of investigations that never contacted me to even attempt to verify either my knowledge, intent, investment, or participation; on the basis of the idea that being CC'd as a witness to a formal complaint, relating to interpersonal conflicts during the proceeding of said conversations, is the same as being party to an intent to cause an internal schism via targeted bullying of particular members (something that can barely be reasonably concluded of the formal complaint itself). There will be probably be more posts as I process this, but for right now I'm speaking solely for myself.

All of this has been decided and executed in the possibly-conscious absence of any kind of opportunity made for me to speak in my own defense. I've been on hiatus from TST-WA operations for the last few months while I get some mental health and personal affairs in order - there's nothing like getting into a sleep-deprived fender bender to make you question what your long-term goals are - and so I'd had basically all of our internal comms muted short of being directly tagged. I wouldn't even have known about my removal were it not for one of the other "conspirators" messaging me to ask if I'd *also* been kicked out, prompting me to check and find out that of course I've been removed from said communications, groups, and emails.

I understand that there was a town hall meeting where the leadership "discussed" the issue with the rest of the general membership, smoothing over a purge as the necessary handling of a "rogue faction." Personally, I'm curious as to how multiple people can just go rogue without ever realizing it, but I'm sure the Official Message clarified things in a way that suggests that everything will be fine as long as you accept the official TST-WA theory of leadership that "we are a democracy, but to a point."

If there is a central tension these events and conflicts revolve around, it is in the question, "What do we owe to our former members? And what do we owe to our current members such that they don't become former members?" And the official answer to that keeps consistently being, "Nothing, because we didn't do anything wrong and you just need to trust that we have the best intentions on the basis of our mission against religious overreach, even as our internal culture increasingly fosters an environment where people are afraid to make systemic critiques and cannot trust that their reports won't be immediately castigated as proof of malicious intent and punished unilaterally." Don't complain, don't speak up, don't "give the right more ammunition," don't be one more example of how ThE LeFt Is EaTiNg ItSeLf, and for the love of Cthulhu don't ever suggest that the call is coming from inside the house, via people whose primary models for organization seem to be the same authoritarian structures that we are all forced to survive in under late capitalism. If you cannot be reaped for social capital then you are chaff - but never question the morality of the scythe, which is merely being pragmatic.

I've been fielding messages from the general membership for the last day or so, asking what the fuck is going on. You know what the fucking gross thing is? There are multiple people who have since come forward, telling me about reports they've made of sexual harassment within TST-WA. They didn't report them to me, a glorified middle-manager, and that is absolutely both their right and the right decision. They entrusted it directly to the top leadership, leadership who is empowered by our national coordinators to act quickly and unilaterally in a crisis - leadership who then did nothing with those reports, even as they came in repeatedly, and who sat by as the perpetrators continued to attend meetings in, as far as the rest of us knew, good standing. Leadership who is even now telling the remaining members to trust them as they purge the calls to do better, because TST-WA is "a democracy, but to a point." These people WERE members in good standing - up until the point they realized their reports would never be taken seriously,

Friend Requests

See All



Lillith Allstar

30 mutual friends

Confirm

Delete

Suggested Pages

See All



Satanic Temple of Myrtle Beach

David and 24 other friends like this.

Like



The Satanic Temple - Arizona Chapter - North

Ashema and 21 other friends like this.

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Synner-gy

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2

16



of the Second, nor the nobility of action and thought of the Seventh.

TST-WA is and has always been a volunteer organization, but that means leadership must be MORE sensitive to the morale and the lived experience of both its current and former membership, more willing to err on the side of making amends - not less. Which of the tenets, exactly, would be violated by doing so? How is the grand mission against arbitrary authority compromised by an internal culture that gives the benefit of the doubt to someone who is already marginalized by society in so many other contexts? One of the guiding principles of Satanism is that religion and morality do not occur in a vacuum that only opens from the top – you will forget this at your peril.

I will not be appealing my removal. I will not aid in facilitating a half-assed coverup that has the end result of normalizing a power structure that has made a habit of shooting first and then telling the victims that they're free to ask questions later, maybe. This purge was not a mistake whose harm needs to merely be resolved. This was a statement of intent, a statement of what social arrangement is considered normal by those in power, and what will be done to defend it – and what will be ignored in the process of defending it. And supposing that I "won" the appeal and cleared my name, we all know exactly that the price of returning would be the expectation of silence about what happened, how it happened, and most importantly, whether the environment that exists might cause it to happen again.

Another of the guiding principles that drives Satanic activism is the idea that silence is consent. And I, being a Satanist, do not consent.

"For the master's tools will never dismantle the master's house. They may allow us to beat him temporarily at his own game, but they will never enable us to bring about genuine change."

– Audre Lorde

Phoenix Knormalle, Verona Cruz and 50 others · 42 Comments · 1 Share

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Comment



Nathan Von Sullivan Addendum: I've been informed that the party line is now no longer "we're a democracy, but to a point," but rather seems to alternate between "TST never was and never will be a democracy" and "technically our chapter is the most democratic one."

Imao do words even mean anything

Like · Reply · 8w

7



A David Johnson Nathan: It's definitely not a dictatorship unaccountable to membership, and I understand the error of my ways and the hurtfulness of that statement now.

Like · Reply · 8w

4



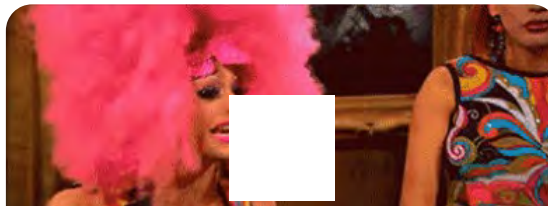
Nathan Von Sullivan ThAt Is An InSuLt

Like · Reply · 8w

2



A David Johnson Nathan Von Sullivan



TENOR

Like · Reply · 8w

2



Write a reply...



whole TST mess too.

Like · Reply · 8w

7



Sabrina Bratsch replied · 2 Replies



Wylie Duffy It is so hard to read and hear constant and worsening lies about oneself when you know you can't defend yourself. I'd even venture to say it's slightly worse when you have a few screenshots (or 286) that vindicate you and disprove every single one of t... See More

Like · Reply · 8w · Edited

6



Jim Kirk



TENOR

Like · Reply · 8w

3



Lucille Ferrin

2

Like · Reply · 8w



Kitty Piercing This sounds oddly familiar... I'm sorry this happened, though.

Like · Reply · 8w

4



Kitty Piercing replied · 2 Replies



Martin Bleeblespoot Rosenberg Welp

Time to found your own

Like · Reply · 8w

4



Nathan Von Sullivan three steps ahead of you

Like · Reply · 8w

2



Martin Bleeblespoot Rosenberg



TENOR

Like · Reply · 8w

1



Nathan Von Sullivan we have a meme page here that we stole from TST:
[Evergreen Memes for Queer Satanic Fiends](#)

and a small group of regional satanists that we're using as a sort of safe space and social club. I imagine i'll be setting up another Discord for us too

Like · Reply · 8w

4

The Satanic Temple 2: Electric Boogaloo?
The Satanic Temple 2: The Second One?
S2: The Mighty Satanists?

Like · Reply · 8w

2



Nathan Von Sullivan Satanism Reloaded actually

Like · Reply · 8w

8



Maehem Nathan Von Sullivan keep me updated on this pls!

Like · Reply · 8w

2



Write a reply...



Inguma Six I don't know exactly what's going on. Just think that there could definitely be a more conducive approach to addressing conflicts without suddenly terminating a handful of members. It's unfortunate.

Like · Reply · 8w

4



Nathan Von Sullivan there definitely could be, but that assumes that the point *is* to address those conflicts rather than simply kicking them down the road for later.

Like · Reply · 8w

5



Wylie Duffy I find it no coincidence that the people kicked out were CC'd as witnesses on a formal email complaint about Tarky, which none of you were told about and instead it was characterized as an attack on Angel, and then the people cc'd were accused of formi... [See More](#)

Like · Reply · 8w · Edited

2



Write a reply...



Tim Pearson Ya'll motherfuckers need Eris. Just sayin'...

Like · Reply · 8w

3



Tim Pearson replied · 2 Replies



Gretchen Koch Sorry to hear this. While I'm not at all acquainted with the organization in question, the machinations sound very familiar.

Like · Reply · 8w

2



June Bug For the sake of my own self-preservation, would it be ok to message you for details on the accused? I live in Tacoma, and as a multiple-abuse survivor the thought of potentially being assaulted again scares the shit out of me.

If you dont know or dont feel at liberty to share names with me, I will understand.... [See More](#)

Like · Reply · 8w

5



Meredith Allen Time to create your own charity-doing, hypocrisy-highlighting political activism group -- with blackjack, and hookers.



Like · Reply · 8w

6

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16



Like · Reply · 8w

1



Verona Cruz I don't know WTF happened but am considering removing myself from the chapter. There seems to be a transparency issue. Being cc'd on an email? What am I missing?

Like · Reply · 8w

7



Verona Cruz replied · 3 Replies



Katherine Bourque I'm disappointed, but not surprised given the way things have been going since the change in leadership. Please let me know how you move forward with Satanism. You were the first person I met in TST and that carries a lot of weight with me.

Like · Reply · 8w

4



Aztrid Nova Fay Wow. Honestly I'm not surprised by all of this. I didn't stay long because I had a feeling that the group wasn't what it seemed.

Like · Reply · 8w

3



Lori Erickson Whoa. I have been inactive for ages due to personal life/mental health issues and am really shocked by this.

Like · Reply · 8w

1



Lori Erickson replied · 2 Replies



Alex Marvin Wow really? Wtf happened? I remember my first meeting and you of all the ppl you made me the most comfortable with just your attitude. You were accepting and I didn't sense you projecting anything onto me. It was much appreciated and how leaders in any... [See More](#)

Like · Reply · 7w · Edited

4



Nathan Von Sullivan replied · 1 Reply



Kirstin DeWeese Wow. Just wow. You know how I feel about you and Kat—this is truly sad—the way you were treated. I would like to think that if I was going to be booted from some group they would warn me first with the opportunity to self correct. Sure some behavior is... [See More](#)

Like · Reply · 7w

1



Write a comment...

EXHIBIT "3"

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

EXHIBIT "4"

3/31/2020

Gmail - You were removed from your role on The Satanic Temple - Washington State Chapter on March 20, 2020,...



Tarkus Claypool <tarkus.claypool@gmail.com>

You were removed from your role on The Satanic Temple - Washington State Chapter on March 20, 2020,...

Tarkus Claypool <tarkus.claypool@gmail.com>

Fri, Mar 20, 2020 at 11:29 PM

To: David Johnson <somedavidjohnson@gmail.com>

Cc: Siri Sanguine <sirisanguine@gmail.com>, Chalice Blythe <chaliceblythe@gmail.com>, Lilith Starr <lilithstarr@gmail.com>

Hi ADJ,

I'd like you to return the Facebook page back to us please. Please re-add me and Siri as admins.

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

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.

[Quoted text hidden]

EXHIBIT "5"

KEZHAYA LAW PLC

MATTHEW A. KEZHAYA
1202 NE MCCLAIN RD
BENTONVILLE, AR 72712



P: (479) 431-6112
F: (479) 282-2892
MATT@KEZHAYA.LAW

March 23, 2020

Mr. David Alan Johnson

By email only to somedavidjohnson@gmail.com

Re: Demand letter – misappropriation of [facebook.com/TheSatanicTempleWashington](https://www.facebook.com/TheSatanicTempleWashington)

Mr. Johnson,

I represent The Satanic Temple in a budding dispute surrounding the misappropriation of the facebook.com webpage located at the URL [facebook.com/TheSatanicTempleWashington](https://www.facebook.com/TheSatanicTempleWashington). As you may know, United Federation of Churches LLC (dba “The Satanic Temple” and abbreviated “TST”) holds the exclusive rights to the name “The Satanic Temple” and the contents of the TST-Washington website.

My understanding is that you were, until recently, responsible for managing social media for the Washington Chapter of TST. It is legally irrelevant whatever caused that change, but shortly thereafter you and a group in tandem with you misappropriated TST’s website and its contents. To my understanding, you have also removed the approved administrators from and replaced them with yourself and possibly others. You then renamed the website “Archived Temple Chapter” and have been posting content under the guise of creating a new organization.

By hijacking my client’s copyrights to the content and trademark rights to the name, my client is entitled to substantial statutory damages from you and all who have acted in tandem with you. For example, a copyright infringement case entitles my client to a minimum of \$750 and up to \$150,000 if the Court finds the infringement is willful. 17 USC § 504(c). A trademark infringement case entitles my client to a minimum of \$1,000 and up to \$100,000. 15 USC § 1117(d). In addition to monetary damages, my client is entitled to costs and attorneys fees and an order for you to permanently return full control of the above facebook page.

I am authorized and ordered to initiate litigation if you do not permanently relinquish full control of the above facebook page by 4:00 PM Central Time on March 24, 2020.


Sincerely,





Matthew A. Kezhaya


EXHIBIT "6"


Exhibit 6
Allies page history


Page transparency 




Page information for Evergreen Memes for Queer Satanic Fiends 

 **Evergreen Memes for Queer Satanic Fiends**
Religious organization



Organizations that manage this Page 


 The person or group responsible for this Page hasn't completed our verification process yet.

History 

-  **Changed name to Evergreen Memes for Queer Satanic Fiends**
March 14, 2020
-  **Changed name to TST WA Allies**
January 6, 2020
-  **Created - South Sound Satanists: Friends of TST**
September 11, 2018

Ads from this Page

-  This Page is not currently running ads.
-  This Page has run ads about social issues, elections or politics.

 Find support or report Page

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1
2
3
4
5
6
7
8
9
10
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14
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16
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18
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22
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26

CERTIFICATE OF SERVICE

I hereby declare under penalty of perjury under the laws of the State of Washington that I have caused to be served a true and correct copy, except where noted, of the below described documents upon the individual(s) listed by the following means:

<p>Attorney for Defendants David Alan Johnson (AKA "ADJ"), Leah Fishbaugh, Mickey Meeham, and Nathan Sullivan,</p> <p>Jeremy Roller, Esq. Arete Law Group 1218 Third Ave. Ste. 2100 Seattle, WA 98101</p> <p>Office: 206-428-3250 Direct: 206-428-3254</p>	<p><input checked="" type="checkbox"/> Via e-service <input checked="" type="checkbox"/> Via email to jroller@aretelaw.com</p>
<p>Service of: AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF</p>	
<p>DATED: May 30, 2023</p>	<p>By: <u> /s/ Benjamin Justus </u> Benjamin Justus</p>