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8 SUPERIOR COURT OF WASHINGTON  
9 FOR KING COUNTY

10 United Federation of Churches, LLC (dba “The  
Satanic Temple”)

11 Plaintiff,

12 v.

13 David Alan Johnson (AKA “ADJ”),  
14 Leah Fishbaugh, Mickey Meeham, and Nathan  
15 Sullivan,

16 Defendants.  
17

Case No.

COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF

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

20 **I. PREAMBLE**

21 1. This case is about two hacked social media accounts and failed attempts at  
22 hacking a different social media account and an email account. TST is suing Defendants for  
23 misappropriating two of TST’s Facebook business pages by replacing all approved  
24 administrators with themselves. Shortly after the misappropriation, Johnson started posting  
25 content critical of TST from TST’s own webpage while retaining the original branding. Later,  
26 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. Johnson*, 598 F.Supp.3d 1084 (W.D.Wash., 2022). However, following a subsequent motion to dismiss for lack of a sufficient amount in controversy, the District Court dismissed without prejudice. *United Federation of Churches, LLC v. Johnson*, 2023 WL 121418 (W.D.Wash., 2023).

## II. JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction. RCW 2.08.010.

4. Venue properly lies with this Court. RCW 4.12.025.

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

### III. PARTIES

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

7. TST subscribes and advances seven fundamental tenets:

- (1) One should strive to act with compassion and empathy toward all creatures in accordance with reason.
- (2) The struggle for justice is an ongoing and necessary pursuit that should prevail over laws and institutions.
- (3) One's body is inviolable, subject to one's own will alone.
- (4) 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 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.
- (6) 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.

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

4 See “Our tenets” available at <https://www.thesatanictemple.org/our-tenets.html>.

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

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

11 10. TST maintains sole title to the trade name “The Satanic Temple” in the context of  
12 religious organizations. See **Exhibit 1** (registration of trademark).

13 11. 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 12. 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 13. The Chapterhead has administrative authority over the Washington Chapter and,  
20 until March 12, 2020, was assisted by an advisory council.

21 14. The Media Liaison promotes the Washington Chapter’s activities to the general  
22 public.

23 15. 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.

16. On March 12, 2020, Defendants were removed from their positions on the council  
because of interpersonal conflicts with Chapter leadership and other councilors.

17. Defendant David Alan Johnson is an individual residing in Seattle, which is within 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.

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

19. Defendant Leah Fishbaugh is an associate of Johnson, and former associate of TST, who aided and abetted the hacking and who separately attempted to hack the Google account. Fishbaugh also lives in Seattle. Fishbaugh changed the account credentials to the Washington Chapter's email account in a failed attempt to usurp control over the email account. On information and belief, Johnson has wrongfully given Fishbaugh administrative privileges to TST's Washington Chapter page.

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

## IV. FACTUAL BACKGROUND

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

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

1           23.     Google is a ubiquitous internet-based information platform. Among its many  
2 services, Google provides an email platform (“gmail”) and a cloud-based document creation and  
3 storage platform (“Google Drive.”)

4           24.     At the relevant time, Facebook was the Washington Chapter’s primary platform of  
5 communicating with its membership.

6           25.     At the relevant time, Twitter was the Washington Chapter’s secondary platform of  
7 communicating with its membership.

8           26.     TST’s Washington Chapter has a Google account to generally facilitate its  
9 organizational purposes by creating and storing documents.

10          27.     In October of 2014, the Washington Chapter business page was created exclusively  
11 for the benefit of TST in its efforts to disseminate information for what was then the Seattle Chapter.  
12 See id., in its current state, available at <https://www.facebook.com/thesatanictemplewashington>.  
13 See also **Exhibit 2** (Chapter page history, updated since original complaint).

14          28.     Over the next several years, the Washington Chapter has grown the Facebook page  
15 to an audience exceeding 17,000 followers. Ibid.

16          29.     In January of 2015, the Washington Chapter created a Twitter account for the  
17 organization. See id. available at [https://twitter.com/TST\\_Washington](https://twitter.com/TST_Washington). Currently, the Twitter  
18 account has an audience of about 4,000 followers. Id.

19          30.     In September of 2018, the Washington Chapter created a secondary Facebook page,  
20 named “TST WA Allies,” to facilitate communications with individuals who were interested in TST  
21 but did not want to identify as a member. Since the original complaint, Defendants renamed the  
22 Allies page to “Evergreen Memes for Queer Satanic Fiends.” **Exhibit 3**; see also  
23 <https://www.facebook.com/queersatanic> (Last visited April 26, 2021).

24          31.     Until the hacking, both Facebook pages were maintained and controlled exclusively  
25 by administrators approved by TST.

26     ///

1           32.     Administrators are given a written Code of Conduct, which instruct requirements for  
2 permissible activity on behalf of TST. In relevant part, the instructions pertaining to online conduct  
3 follow:

4           Public statements & interactions with media

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

9           ...

10          Confidentiality

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

15          ...

16          Copyright

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

21          ...

22          Online code of conduct

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

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

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

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

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

14 If mediation is needed, it will be provided.

15 See form agreement, available as **Exhibit 4**. Sullivan has the only known copies of the agreement  
16 which was signed by Defendants.

17 33. The above written instructions form the contours of administrators' authorization to  
18 access TST's social media accounts.

19 34. Defendants, each, were entrusted with administrative rights to the above-described  
20 social media accounts, subject to the requirements set forth in the written instructions.

21 35. Until the hacking, Defendant Sullivan had exclusive access of the original copies of  
22 each Defendants' signature, acknowledging and agreeing to be bound by the above terms in return  
23 for access to the social media accounts.

24 36. On information and belief, Sullivan still has exclusive access to these documents,  
25 among other highly sensitive materials including membership listings, internal policies and  
26 procedures, and meeting notes.

1           37. Defendants were each well aware of the Code of Conduct because it served as a  
2 source of friction leading up to the events giving rise to this litigation. For example, on March 2,  
3 2020, Johnson shared the following post on the Allies page outside of his authority:



19           38. The ensuing deletion and reiteration of the expectation that Johnson adhere to the  
20 Code of Conduct as a condition of continued social media access would serve as foreshadowing for  
21 the misappropriation of the Allies page.

22           39. Between March 2 and March 12, TST's Washington leadership became increasingly  
23 frustrated with Defendants' organizational failures and inflammation of interpersonal conflicts  
24 within the advisory council.

25           40. "Organizational failures," as used above, particularly included:

- 26           (1) Repeatedly operating TST's social media to endorse leftist politics as opposed  
to Satanism, despite repeated reminders that this was unacceptable;



- 1 (2) Failing to attend a particular meeting to address the above issue; and
- 2 (3) Failing to initiate, conceive, or execute any publicity for the Washington
- 3 Chapter's Prayer for Plurality event, which was a matter of organizational
- 4 significance.

5 41. On March 12, 2020, TST's Washington leadership removed Defendants from their

6 advisory positions.

7 42. Defendants' positions on the advisory council entailed the authorization to manage

8 the Chapter's social media activity. By removing Defendants from their advisory positions, the

9 Washington Chapter leadership revoked Defendants' authorization to manage the Chapter's social

10 media activity and revoked Defendants' authorization to serve as custodians of records.

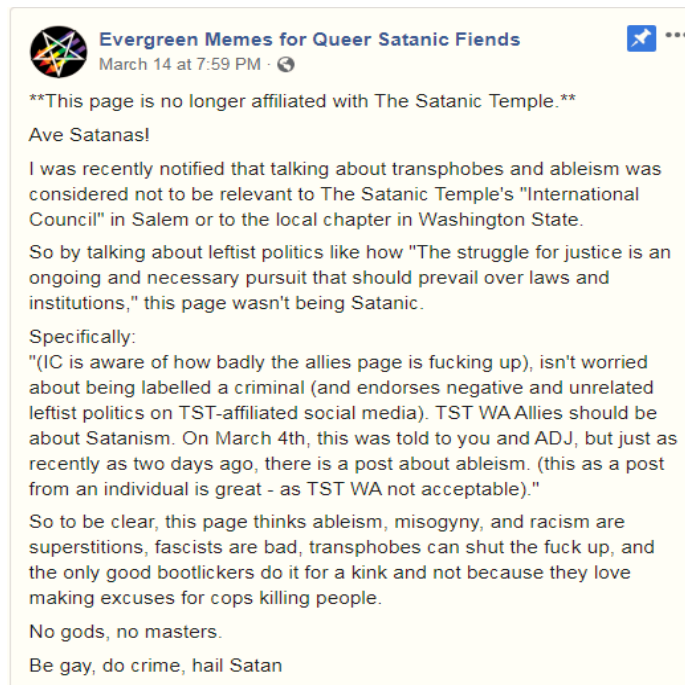
11 43. At some point between March 12 and March 14, 2020, Defendants entered into an

12 unlawful agreement to misappropriate and shut down substantially all the internet presence of TST's

13 Washington Chapter toward the twin goals of forming a competitor organization and harming TST.

14 44. On March 14, 2020, Meeham exceeded authorization for the Allies page by

15 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:

1           45. Meeham, in conjunction with the other named Defendants, then began posting  
2 material in violation of the Code of Conduct and in disregard of the revocation of authority entailed  
3 in being removed from the position on the advisory council.

4           46. Sullivan explicitly recognized that Defendants had no authorization to access the  
5 Allies page. On March 15, 2020, Sullivan publicly stated that he was no longer affiliated with TST.  
6 **Exhibit 5.** A commentator suggested “Time to found your own,” to which Sullivan responded  
7 “three steps ahead of you” and “we have a meme page here that we stole from TST: Evergreen  
8 Memes for Queer Satanic Friends.” **Id.** at pp. 3-4.

9           47. Following Meeham’s usurpation of the Allies page, the Washington Chapterhead  
10 removed all defendants from administrative access privileges to the remaining social media  
11 accounts. More specifically, the Chapterhead removed all administrative privileges of Johnson,  
12 Fishbaugh, Meeham, and Sullivan to the Facebook Chapter account and the Twitter and Google  
13 accounts referenced herein.

14           48. On or around March 18, 2020, Johnson hacked the TST’s Twitter account, removed  
15 all of TST’s approved administrators, replaced the approved administrators with his co-Defendants,  
16 followed a number of extremist groups, and changed the description from “Washington State  
17 Chapter of the Satanic Temple” to “Satan stands as the ultimate icon for selfless revolt. We oppose  
18 irrational, unjust hierarchies like white supremacy, patriarchy, ableism, & cishet normality.”  
19 Johnson took these actions despite having a subjective awareness that he no longer had authorization  
20 to use TST’s Twitter account.

21           49. On March 20, 2020, despite having a subjective awareness that he no longer had  
22 authorization to use TST’s Facebook Chapter page, Johnson took control of the Chapter page by  
23 removing all TST-approved administrators, modifying the cover page without approval, and posting  
24 a three-page manifesto. The manifesto, as it looked as of the original complaint, is attached and  
25 incorporated as **Exhibit 6** (the archive reflects Central time). Originally, the manifesto was posted  
26 with the original trade dress of TST.

1           50.     Broadly, the manifesto levied false claims that TST leadership is cozy with the alt-  
2 right, are white supremacists, are generally insufficiently leftist for Johnson's preference, and does  
3 not conform to Johnson's impression of Satanism. Posting the manifesto exceeded Johnson's grant  
4 of authority as defined in the Code of Conduct, disregarded the revocation of authority entailed in  
5 being removed from the position on the advisory council, and disregarded the explicit revocation of  
6 authority entailed in having his administrative access to the Chapter page removed.

7           51.     On March 20 at 11:29 pm, the Chapter's media liaison emailed Johnson a cease and  
8 desist instruction, stating "I'd like you to return the Facebook page back to us please." **Exhibit 7**

9           52.     Johnson ignored the email and did not return the Facebook page to TST.

10          53.     Instead, Johnson spent the next couple of days posting links and commentary from  
11 the Chapter page, all with the general, and false, theme that TST leaders are incompetent fascists.  
12 See **Exhibit 8** (posts and commentary in excess of authorization). The links and commentary all  
13 exceeded Johnson's grant of authority as defined in the Code of Conduct, disregarded the revocation  
14 of authority entailed in being removed from the position on the advisory council, disregarded the  
15 explicit revocation of authority entailed in having his administrative access to the Chapter page  
16 removed, and disregarded the explicit cease and desist demand referenced in ¶ 53.

17          54.     On March 20 at 11:36 pm, Fishbaugh attempted to change the password to the  
18 Chapter's Google-based email account by changing the recovery email and changing the phone  
19 number. This ignored the revocation of authority entailed in being removed from the position on  
20 the advisory council and disregarded the explicit withdrawal of authority entailed in removing her  
21 administrative access.

22          55.     On March 22 at 3:08 pm, Johnson modified the name of the Chapter page from "The  
23 Satanic Temple Washington" to "Satanic Washington State – Archived Temple Chapter" and  
24 modified the profile picture to replace TST-specific iconography with "antifa" symbolism. These  
25 modifications disregarded the revocation of authority entailed in being removed from the position  
26 on the advisory council, disregarded the explicit revocation of authorization entailed in having his

1 social media administrative access revoked, and disregarded the explicit cease and desist demands  
2 referenced in ¶ 53.

3 56. By operation of his removal as a member of the advisory council, Sullivan's control  
4 over original signed copies of membership agreements, cloud-based trade secret documentation,  
5 became unauthorized.

6 57. Of importance to this action, Sullivan had, and continues to have, exclusive control  
7 over membership enrollment and application documents and background check documents for  
8 prospective new members (to exclude felons from membership), both of which are paper  
9 documents. Sullivan also had, and continues to have, an electronic database of the membership, as  
10 well as their contact information.

11 58. TST opposes the use or threat of violence as a mechanism for control.

12 59. The Chapter page maintains its original URL:  
13 <https://www.facebook.com/TheSatanicTempleWashington/>.

14 60. 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 to TST.

17 61. 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 62. One week prior to the original complaint, this time through counsel, TST  
20 reiterated the legal theories at play to Facebook and to Johnson. More particularly, On March 23,  
21 2020, Matthew Kezhaya (TST's outside general counsel) issued a demand letter to Johnson which  
22 threatened this very litigation unless he "permanently relinquish[ed] full control" of the Chapter  
23 page "by 4:00 PM Central Time on March 24, 2020." **Exhibit 9.**

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

1 media administrative access revoked, and disregarded the explicit cease and desist demands  
2 referenced in ¶¶ 53 and 64.

3 64. Facebook did not respond and did not return control of the Chapter page until after  
4 the original complaint. See Exhibit 2.

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

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

8 67. On an ongoing basis since March 2020, Defendants have continually exercised  
9 dominion and control over TST's property despite repeated demands by TST for a return of the  
10 same.

11 68. Since March 2020, Defendants have wrongfully detained profits from the use of  
12 TST's property. As former agents of TST who were entrusted with managing TST's property, they  
13 owe all profits arising out of their operation of TST's property to TST.

### 14 **III. CAUSES OF ACTION**

#### 15 **Count 1:**

#### 16 **Tortious interference**

17 69. TST re-alleges and incorporates by reference the foregoing allegations.

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

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

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

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

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

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

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

77. Based on the foregoing, TST is entitled to injunctive relief in the form of a permanent injunction enjoining Defendants from accessing any of TST’s “protected computers” under threat of contempt, and costs and attorney’s fees to be computed after entry of the decree.

**Count 2:**

## Trespass to chattels

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

79. Trespass to chattels is the intentional interference with a party's personal property without justification that deprives the owner of possession or use. *G&G Closed Cir. Events, LLC*

1 v. Single, LLC, No. C18-1295JLR, 2020 WL 5815050, at \*4 (W.D. Wash. Sept. 30, 2020) (citing  
2 Restatement (Second) of Torts § 217).

3 80. The first chattel at issue is TST's possessory interest in Facebook's computer  
4 network which manifested through the internet as the Chapter page and the Allies page.

5 81. Defendants intentionally dispossessed TST of the Chapter page and the Allies page  
6 by logging in to Facebook's computer network and replacing Defendants for TST's authorized  
7 administrators of the pages.

8 82. Defendants had no justification to remove all of TST's approved administrators or  
9 to usurp the pages at issue. Their authorization to use the pages were revoked by virtue of the  
10 removal of their positions on the advisory council and was explicitly revoked as to the Chapter page  
11 by the revocation of their administrative access.

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

20 84. The second chattel at issue is TST's membership-related documents, whether in  
21 physical or electronic format.

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

25 86. Based on the foregoing, TST is entitled to injunctive relief in the form of a permanent  
26 injunction enjoining Defendants from accessing any of TST's "protected computers" under threat

1 of contempt, an order to return TST's membership related documents and destroy any copies  
2 thereof, and costs and attorney's fees to be computed after entry of the decree.

3 **Count 3:**

4 **Conversion**

5 87. TST re-alleges and incorporates by reference the foregoing allegations.

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

10 89. "Willful" means "intentional" but not necessarily "malicious." Id. (citing Schilling  
11 v. Radio Holdings, Inc., 136 Wn.2d 152, 159–60 (Wash. 1998)) (citations omitted).

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

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

23 92. The same chattels are at issue in this Conversion claim as the Trespass to Chattels  
24 claim. Both claims are included because Washington courts tend to discuss the two claims in  
25 tandem. E.g. Damiano, above; see also Sexton v. Brown, 147 Wash. App. 1005 (2008).

26 ///



1 **Count 4:**

2 **Breach of fiduciary duty**

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

10 **IV. PRAYER FOR RELIEF**

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

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

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

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

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

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

1 Respectfully submitted this 5th day of April, 2023.

2 LYBECK PEDREIRA & JUSTUS, PLLC

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EXHIBIT "1"

**Trademarks** > **Trademark Electronic Search System (TESS)**

TESS was last updated on Tue Mar 31 04:37:22 EDT 2020

<a href="#">TESS HOME</a>	<a href="#">NEW USER</a>	<a href="#">STRUCTURED</a>	<a href="#">FREE FORM</a>	<a href="#">BROWSE DICT</a>	<a href="#">SEARCH OG</a>	<a href="#">BOTTOM</a>	<a href="#">HELP</a>	<a href="#">PREV LIST</a>	<a href="#">CURR LIST</a>	<a href="#">NEXT LIST</a>
<a href="#">FIRST DOC</a>	<a href="#">PREV DOC</a>	<a href="#">NEXT DOC</a>	<a href="#">LAST DOC</a>							

 Please logout when you are done to release system resources allocated for you.

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<a href="#">TSDR</a>	<a href="#">ASSIGN Status</a>	<a href="#">TTAB Status</a>	( Use the "Back" button of the Internet Browser to return to TESS)
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# THE SATANIC TEMPLE

**Word Mark** THE **SATANIC TEMPLE**

**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

**Disclaimer** NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "SATANIC" APART FROM THE MARK AS SHOWN

**Type of Mark** SERVICE MARK

**Register** SUPPLEMENTAL

**Live/Dead Indicator** LIVE

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<a href="#">TESS HOME</a>	<a href="#">NEW USER</a>	<a href="#">STRUCTURED</a>	<a href="#">FREE FORM</a>	<a href="#">BROWSE DICT</a>	<a href="#">SEARCH OG</a>	<a href="#">TOP</a>	<a href="#">HELP</a>	<a href="#">PREV LIST</a>	<a href="#">CURR LIST</a>	<a href="#">NEXT LIST</a>
<a href="#">FIRST DOC</a>	<a href="#">PREV DOC</a>	<a href="#">NEXT DOC</a>	<a href="#">LAST DOC</a>							

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EXHIBIT "2"

## Exhibit 2

TST's Washington Chapter Facebook page history as of March 29, 2021

### Page History



**Changed name to The Satanic Temple - Washington State Chapter**

May 27, 2020



**Changed name to Satanic Washington State - Archived Temple Chapter**

March 22, 2020



**Changed name to The Satanic Temple - Washington State Chapter**

January 1, 2020

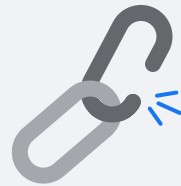


**Page created - The Satanic Temple - Seattle Chapter**

October 19, 2014

EXHIBIT "3"





## This Page Isn't Available

The link may be broken, or the page may have been removed. Check to see if the link you're trying to open is correct.

[Go to News Feed](#)

[Go Back](#)

[Visit Help Center](#)



## EXHIBIT "4"



# 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*



## EXHIBIT "5"



**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  

ConfirmDelete

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.  

Like

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Synner-gy

Home

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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

Like

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



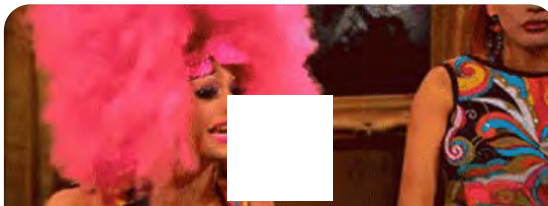
**Nathan Von Sullivan** ThAt Is An InSuLt

Like · Reply · 8w

2



**A David Johnson** Nathan Von Sullivan



TENOR

Like · Reply · 8w

2



Write a reply...

Search



Synner-gy

Home

Create

2

16



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

Search



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2

16



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

Search


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 "6"

## 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 cisgender 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

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EXHIBIT "7"

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>

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

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**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 <lilithxstarr@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

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[Quoted text hidden]

## EXHIBIT "8"

## 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 HelLA: A Satanic Collective • August 4, 2018 at 11:59PM CDT



via [instagram.com](https://www.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."

**THE  
SATANIC**

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.

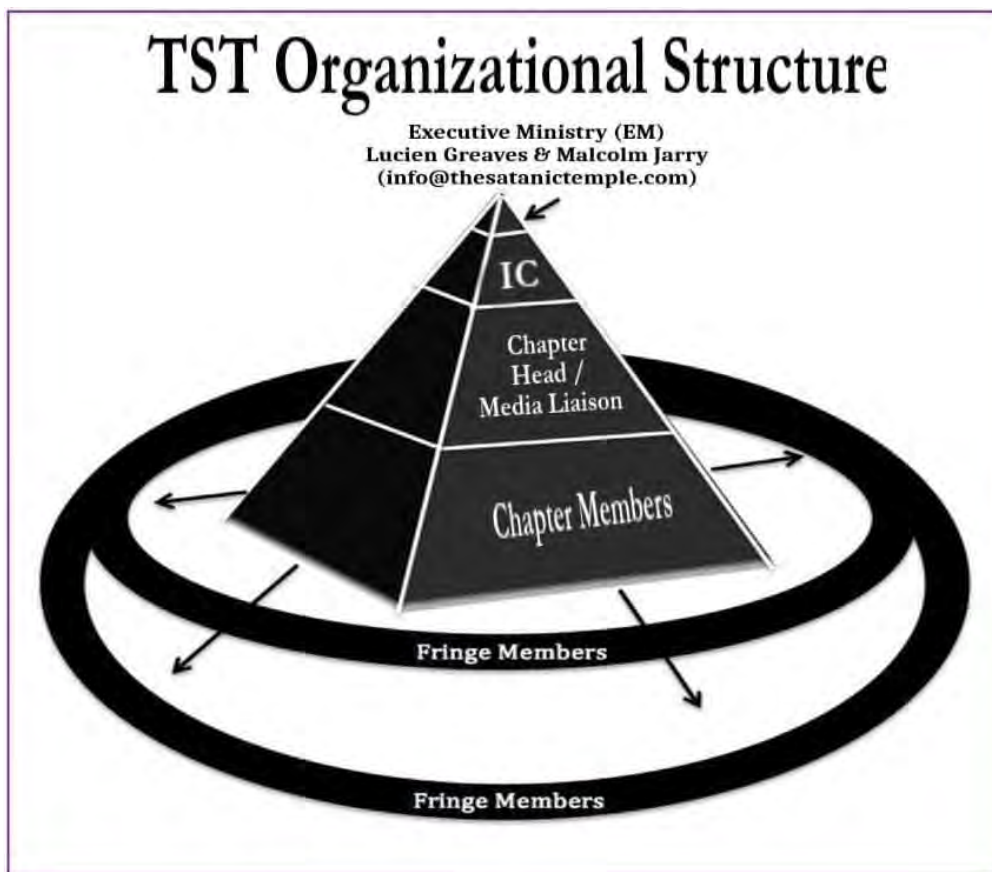
15

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 ·

Like Page

20

6 Comments 1 Share

Like

Comment

Share



Most Relevant



Write a comment...



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 [#DeusVult](#) [#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."

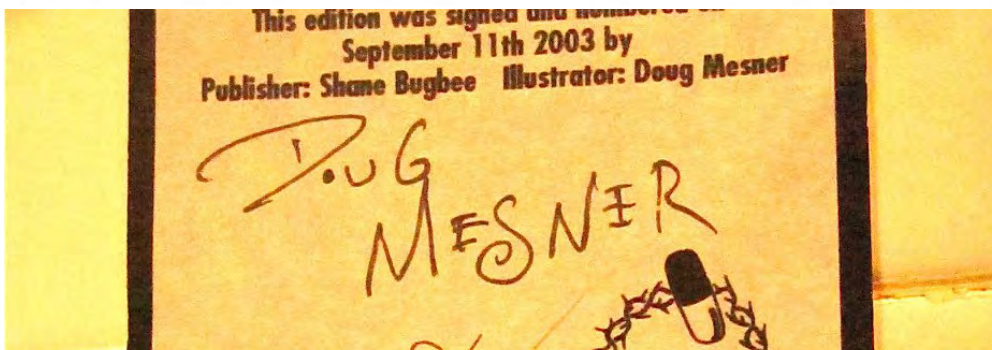
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White Suprememcist book, the TST spokesperson said 'yes.'"

**their terms. Instead, say something like:** "I can't speak to something that ha  
is incredibly inclusive and we welcome members from all walks of life."





20

8 Comments 2 Shares

## 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!



## EXHIBIT "9"

# 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](mailto:somedavidjohnson@gmail.com)

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