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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

DECLARATION OF TARKUS  
CLAYPOOL

COMES NOW Paul Case / Tarkus Claypool, who states as follows under penalty of perjury.

- Identity and qualifications as witness.** I am Tarkus Claypool, an adult of sound mind with no felonies. I make these statements on my own personal knowledge and under the penalty of perjury. Participation with The Satanic Temple is socially discouraged and entails risk to my personal, financial, and security well-being. For example: I have been personally targeted for online harassment by Defendants because of my affiliation with The Satanic Temple, my ability to obtain and retain gainful employment would be adversely affected by public affiliation with The Satanic Temple, and dangerous people target Satanists for harassment and threats to personal safety. For these reasons, I use the pseudonym "Tarkus Claypool" to separate my involvement with The Satanic Temple from my personal and private life.



# **Exhibit 4**

South Sound Satanists Operational Guide

## South Sound Satanists Operational Guide

The purpose of this document is to outline the permissions for independent actions of the SSS and the scope of oversight from the TST Seattle chapter that will be supplied.

From TST National's webpage: *"The mission of The Satanic Temple is to encourage benevolence and empathy among all people, reject tyrannical authority, advocate practical common sense and justice, and be directed by the human conscience to undertake noble pursuits guided by the individual will."*

### I. Structure

- A. SSS shall be composed of a self-selected governing board which must include at least one Seattle Chapter Strategy Council member (selected by the SC) who attends all planning meetings (in person or via video chat).
- B. SSS membership is open to official TST members, Acolytes, and public attendees interested in TST.
- C. Public meetings and events shall refrain from discussion of ongoing and planned protest or counterprotest actions of the greater Seattle chapter for safety concerns.
- D. Private meetings consisting of TST members and Acolytes should disseminate all relevant information discussed at the Seattle Chapter meetings to the best of their ability using the meeting minutes provided via email/TST Seattle cloud drive limited access.

### II. Scope of Action

- A. SSS shall function as a secondary meeting arena for TST Seattle Chapter and as social group for active members
- B. Approved Acolytes and members must still meet their membership attendance obligations at the main Seattle chapter for a minimum of 1 out of the 4 required meetings as outlined in our bylaws.
- C. SSS may plan independent actions that fall within the scope of pre-approved actions for the greater Seattle chapter as follows:
  1. Literature distributions where other religious groups are already distributing on public lands
  2. Park or beach clean-ups - both independent and sponsored by local governments or agencies
  3. Picnics, walks, and other social events, both private and open to the public.
- D. The following actions will require oversight from the Seattle chapter leadership and potentially approval from National Council:
  1. Protests and counter protests
  2. Fundraising events

3. Community participation in events (i.e. parades, marches, etc) under the TST banner
  - a) Reference material from affiliate contract: **OVERSIGHT BY TST.**
    - (1) Affiliate acknowledges and agrees that TST has extended significant time and capital creating goodwill and a positive reputation around its brand. In order to protect the aforesaid goodwill and reputation, Affiliate agrees as follows:
      - (a) Affiliate agrees to submit any proposed campaign, activism, event, or plan of action which will include Protected Content or otherwise be associated with TST to TST for its prior approval. Such approval may be withheld at the sole discretion of TST.
      - (b) Affiliate agrees to submit any promotional or printed material containing Protected Content to TST for its prior approval. Such material includes, but is not limited to, any material disseminated by print, video, film, music, website, email, social media, the internet, or any other medium. Such approval may be withheld at the sole discretion of TST.
      - (c) Any advertising and promotional material involving Protected Content shall be consistent with the quality and professionalism previously associated with TST. Content must comply with the standards, tenets, philosophy, and spirit of TST.

E. Prohibited activities

1. SSS should refrain from booking local events in competition with the Seattle Chapter calendar – priority is always given to Seattle if a date conflict arises.
2. No member of SSS shall represent TST to the media without the express written approval of the SC and NC, this includes interviews, news releases, and filming by an outside organization for other than private distribution.
3. Until Ordination of Clergy is offered and approved through National, no member of the Seattle Chapter or SSS shall perform a wedding while representing TST. Please note this does not preclude one from being ordained elsewhere and performing a “satanic wedding.”
4. No private bank account or “stash of funds” shall be held for exclusive SSS usage – any and all donations, fundraiser and event income shall be deposited into the Seattle chapter account and any approved expenses reimbursed from said account with appropriate documentation and accountability to the chapter and appropriate disbursements to National made in accordance with TST financial regulations.

5. Any purchase or donation of real property by or to the SSS is prohibited at this time and shall only occur with full agreement of the Chapter Heads and SC under the guidance of the NC due to legal liability issues and restrictions placed on all chapters by National Council.

### III. Accountability

- A. Meeting minutes to be posted in the SSS cloud drive folder with full access given to the SC
- B. SSS will have access to meeting minutes from Seattle in the same timeframe and format as they are made available to all active members.
- C. Attendance records are not necessary for gatherings that are not classified as Actions as many events are open to the general public.
- D. Actions need to have attendance noted and follow approved plans of action as outlined in the event proposal forms.
- E. SC oversight
  1. Assigned SC liaison needs to have full access and be consulted on all planned events, outings, meetings, actions.
  2. SC liaison will consult with the entire SC and may elect to help SSS file formal requests for Actions, but does not have the authority to give approval on their own.
  3. All requests for information, funding, and other operational needs to be sent in writing via email to the SC and will be addressed at the next available SC meeting as time allows.
  4. Urgent matters should be emailed via the assigned SSS liaison for more timely processing.
- F. SSS must comply with all directives given by the National Council.