

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

UNITED FEDERATION OF CHURCHES,
LLC (dba "THE SATANIC TEMPLE")

Plaintiff/Counterclaim
Defendant,

v.

DAVID ALAN JOHNSON (AKA "ADJ"),
LEAH FISHBAUGH, MICKEY MEEHAN,
and NATHAN SULLIVAN,

Defendants/
Counterclaimants

No. 23-2-06120-9 SEA

**DECLARATION OF JEREMY E.
ROLLER IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Jeremy E. Roller declare as follows:

1. I am an attorney at the law firm Arete Law Group PLLC. I represent Defendants David A. Johnson, Leah Fishbaugh, Mickey Joshua Powell, and Nathan Sullivan in this matter. I make this declaration based on my own personal knowledge. I am over the age of eighteen and am otherwise competent to testify. If called upon to testify on the matters herein, I would do so consistently with this declaration.

2. Attached as **Exhibit 1** are true and correct copies of documents produced in this case by Plaintiff United Federation of Churches, LLC ("UFC") in response to

1 Defendants' Requests for Production of Documents. The documents appear to be certificates
2 of organization for United Federation of Churches, LLC.

3 3. Attached as **Exhibit 2** is a true and correct copy of two pages of a document
4 produced in this case by UFC in response to Defendants' Requests for Production of
5 Documents. The document is entitled "The Satanic Temple Chapter Handbook" and attached
6 are the cover page (TST000125) and the page entitled "Organizational Structure"
7 (TST000130). At the page marked TST000130, the document describes Chapters as "self-
8 organized, volunteer-led groups." It also describes Chapters as "autonomous entities." The
9 same page describes "Media Liaisons" as "vetted members of an affiliate chapter that is
10 responsible for the public image of the respective Chapter, and, by extension, the image of
11 TST in that area." For the Court's convenience, the relevant language at page TST000130
12 has been highlighted in yellow.

13 4. Attached as **Exhibit 3** is a true and correct copy of a document entitled
14 "Affiliation Agreement" produced in this case by UFC in response to Defendants' Requests
15 for Production of Documents. The "Affiliation Agreement" dated May 30, 2016 (document
16 numbers TST000115-20) is signed by someone using the name "Lilith Star." Upon
17 information and belief, "Lilith Star" is a pseudonym. UFC has not provided the legal name
18 for the person using the pseudonym Lilith Star.

19 5. Although UFC has produced many versions of documents entitled Affiliation
20 Agreements, it has not produced any Affiliation Agreements that have been signed by UFC.

21 6. UFC has not produced any Affiliation Agreement between UFC and
22 Washington Infernal, LLC.

23 7. Attached as **Exhibit 4** is a true and correct copy of a document numbered
24 TST000151, produced in this case by UFC in response to Defendants' Requests for
25 Production of Documents. The document appears to be a March 14, 2020 email sent by "Siri
26 Sanguine" to "tst-wa."

1 8. Attached as **Exhibit 5** is a true and correct copy of Defendants' Interrogatories
2 Nos. 17 and 24 to UFC and UFC's Answer thereto.

3 9. Attached as **Exhibit 6** are true and correct copies of the three complaints that
4 UFC filed against Defendants in the United States District Court for the Western District of
5 Washington.

6 10. Attached as **Exhibit 7** is a true and correct copy of the January 6, 2023 federal
7 district court order (Docket No. 48), dismissing state law claims without prejudice for lack
8 of jurisdiction.

9 11. On appeal of the federal district court matter, UFC argued that the Court of
10 Appeals should remand for a determination as to whether UFC could assert the required
11 amount in controversy for diversity jurisdiction. The Court of Appeals agreed. Attached as
12 **Exhibit 8** is a true and correct copy of the Ninth Circuit Court of Appeal's November 30,
13 2023 Memorandum remanding the federal case to district court for a determination of
14 diversity jurisdiction.

15 12. On January 3, 2024 the federal district court ordered the parties to meet and
16 confer and propose deadlines for jurisdictional discovery. Attached as **Exhibit 9** is a true and
17 correct copy of the district court's January 3, 2024 order.

18 13. On January 24, 2024, UFC filed in the United States District Court for the
19 Western District of Washington a Notice of Dismissal Without Prejudice, a true and correct
20 copy of which is attached hereto as **Exhibit 10**.

21 14. On January 25, 2024, the United States District Court for the Western District
22 of Washington sent a notice to the parties closing the case due to UFC's voluntary dismissal.
23 A true and correct copy of the notice is attached hereto as **Exhibit 11**.

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

Executed in Seattle, Washington on this 23rd day of August 2024.

/s/ Jeremy E. Roller
Jeremy E. Roller

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date I caused true and correct copies of the foregoing
3 document to be served upon the following, at the addresses stated below, via the method of
4 service indicated.

5 **LYBECK PEDREIRA & JUSTUS, PLLC**

6
7 Benjamin Justus
8 Fifth Floor
9 7900 SE 28th St., Suite 500
10 Mercer Island, WA 98040
11 ben@lpjustus.com

E-mail
 U.S. Mail
 E-filing

12 **KEZHAYA LAW PLC**

13 Matthew A. Kezhaya (*pro hac vice*)
14 150 S. Fifth Street, Suite 1850
15 Minneapolis, MN 55402
16 matt@kezhaya.law

E-mail
 U.S. Mail
 E-filing

17 *Attorneys for Plaintiff*

18 Dated this 23rd day of August, 2024 in Seattle, Washington.

19 /s/ Janet C. Fischer
20 Janet C. Fischer
21 Paralegal

EXHIBIT 1



**The Commonwealth of Massachusetts
William Francis Galvin**

Minimum Fee: \$100.00

Secretary of the Commonwealth, Corporations Division
One Ashburton Place, 17th floor
Boston, MA 02108-1512
Telephone: (617) 727-9640

Special Filing Instructions

Restated Certificate of Organization
(General Laws, Chapter)

Identification Number: 001127600

The date of filing of the original certificate of organization: 2/4/2014

1. The exact name of the limited liability company is: UNITED FEDERATION OF CHURCHES, LLC
and if changed, the name under which it was originally organized:

2a. Location of its principal office:

No. and Street: 64 BRIDGE STREET
City or Town: SALEM State: MA Zip: 01970 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:

No. and Street: 64 BRIDGE STREET
City or Town: SALEM State: MA Zip: 01970 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:

THE PURPOSE OF THE COMPANY IS TO CONDUCT ANY AND ALL LAWFUL BUSINESS THAT CAN BE PERFORMED BY A LIMITED LIABILITY COMPANY FORMED UNDER G.L. C. 156 C, INCLUDING, BUT NOT LIMITED TO, EDUCATIONAL ACTIVITIES, CONDUCTING THE SALE OF ANY MERCHANDISE AND LITERATURE, AND ANY AND ALL ACTIVITIES INCIDENTAL THERETO.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: DOUG MESNER
No. and Street: 64 BRIDGE STREET
City or Town: SALEM State: MA Zip: 01970 Country: USA

I, DOUG MESNER resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

6. The name and business address of each manager, if any:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	MALCOLM JARRY	64 BRIDGE STREET SALEM, MA 01970 USA

YST000071

7. The name and business address of the person(s) in addition to the manager(s), authorized to execute

documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	DOUG MESNER	64 BRIDGE STREET SALEM, MA 01970 UNI

8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	MALCOLM JARRY	64 BRIDGE STREET SALEM, MA 01970 USA

9. Additional matters:

10. Describe any amendments to be effected by the restated certificate, and if none, include a statement to that affect:

2A/2B THE ADDRESS OF THE LOCATION WHERE RECORDS ARE MAINTAINED HAS BEEN UP DATED TO: 64 BRIDGE STREET SALEM, MA 01970 3 THE CHARACTER AND SERVICES OF THE BUSINESS WERE ADDED 5 THE NAME AND ADDRESS OF THE REGISTERED AGENT WAS UPD ATED TO: DOUG MESNER 64 BRIDGE STREET SALEM, MA 01970 6 THE NAME AND ADDRESS OF THE BUSINESS MANAGER WAS UPDATED TO: MALCOLM JARRY 64 BRIDGE STREET SALEM MA 01970 7 THE NAME OF THE PERSON AUTHORIZED TO EXECUTE DOCUMENTS WAS UP DATED TO: DOUG MESNER 64 BRIDGE STREET SALEM, MA 01970 8. THE NAME AND BUSINESS ADDRESS OF THE PERSON(S) AUTHORIZED TO EXECUTE, ACKNOWLEDGE, DELIVER AND RECORD ANY RECORDABLE INSTRUMENT PURPORTING TO AFFECT AN INTEREST IN REAL PROPERTY WAS UPDATED TO: MALCOLM JARRY 64 BRIDGE STREET SALEM MA 01970

11. The restated certificate shall be effective when filed unless a later effective date is specified:

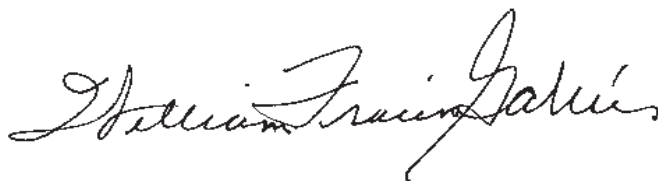
SIGNED UNDER THE PENALTIES OF PERJURY, this 21 Day of May, 2018,
MALCOLM JARRY , Signature of Applicant.

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are

deemed to have been filed with me on:

May 21, 2018 11:35 AM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large initial "W" and "G".

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

D

The Commonwealth of Massachusetts

William Francis Galvin

Secretary of the Commonwealth

One Ashburton Place, Room 1717, Boston, Massachusetts 02108-1512

**Limited Liability Company
Certificate of Organization
(General Laws Chapter 156C, Section 12)**

FILED

FEB 4 2014

**SECRETARY OF THE COMMONWEALTH
CORPORATIONS DIVISION**

Federal Identification No.: _____

- (1) The exact name of the limited liability company:

United Federation of Churches, LLC

- (2) The street address of the office in the commonwealth at which its records will be maintained:

519 Somerville Ave. #288, Somerville, MA 02143

- (3) The general character of the business:

Educational activities and all other lawful purposes.

- (4) Latest date of dissolution, if specified: _____

- (5) The name and street address, of the resident agent in the commonwealth:

NAME

ADDRESS

Douglas Misicko

519 Somerville Ave. #288
Somerville, MA 02143

- (6) The name and business address, if different from office location, of each manager, if any:

NAME

ADDRESS

Douglas Misicko

TST000074

- (7) The name and business address, if different from office location, of each person in addition to manager(s) authorized to execute documents filed with the Corporations Division, and at least one person shall be named if there are no managers:

NAME

ADDRESS

- (8) The name and business address, if different from office location, of each person authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property recorded with a registry of deeds or district office of the land court:

NAME

ADDRESS

- (9) Additional matters:

Signed by (by at least one authorized signatory):



Consent of resident agent:

I Douglas Misicko

resident agent of the above limited liability company, consent to my appointment as resident agent pursuant to G.L. c 156C § 12*

**or attach resident agent's consent hereto.*

TST000075

COMMONWEALTH OF MASSACHUSETTS

#2927


William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

Limited Liability Company Certificate
(General Laws Chapter 156C, Section 12)

I hereby certify that upon examination of this limited liability company certificate, duly submitted to me, it appears that the provisions of the General Laws relative thereto have been complied with, and I hereby approve said application; and the filing fee in the amount of \$500.00 having been paid, said application is deemed to have been filed with me this 4th day of February, 20 14, at _____ a.m./p.m. time

1215408

Effective date: _____


WILLIAM FRANCIS GALVIN
Secretary of the Commonwealth

Filing fee: \$500

TO BE FILLED IN BY LIMITED LIABILITY COMPANY
Contact Information:

Douglas Misicko

519 Somerville Ave. #288

Somerville, MA 02143

Telephone: _____

Email: doug@process.org

Upon filing, a copy of this filing will be available at www.sec.state.ma.us/cor.
If the document is rejected, a copy of the rejection sheet and rejected document will be available in the rejected queue.

SECRETARY OF THE
COMMONWEALTH OF MASSACHUSETTS
CORPORATIONS DIVISION
2014 FEB -4 PM 1:42

EXHIBIT 2



THE SATANIC TEMPLE
CHAPTER HANDBOOK

TST000125

ORGANIZATIONAL STRUCTURE

TST Affiliate Chapters

Affiliate Chapters are one part of the overall organizational structure of TST. Chapters are self-organized, volunteer-led groups that seek to bring together and empower like-minded individuals who are passionate about supporting The Satanic Temple's mission. These groups initiate local programs and activities as well as work to accomplish national and regional goals. Chapters promote awareness of the TST mission, educate their peers, and encourage critical thinking, activism, and justice in their communities. The functions of the chapters are to:

- Hold meetings as well as social and educational events
- Provide a religious community for members that is a safe space for like-minded individuals.
- Engage in campaigns, actions, and events that support The Satanic Temple's mission and values
- Fundraise locally to support their activities as well as support TST. While Affiliate Chapters are autonomous entities, their memberships overlap the national membership. Some chapters may even decide to operate as a subsidiary arm of the national organization. Either setup requires that the chapters agree to certain standards and accept specific responsibilities within the organization and provide input to, and accept direction from, both the International Council (IC) and Executive Ministry (EM).

TST Affiliate Media Liaisons

Media Liaisons are vetted members of an affiliate chapter that is responsible for the public image of their respective Chapter and, by extension, the image of TST in that area.

TST Affiliate Chapter Heads

Chapter Heads are responsible for setting up and managing their chapter in line with TST guidelines. They are the responsible individuals who are to:

- Remain in direct communication with the International Council, reporting to their IC Point of Contact (IC POC)
- Report on and keep track of chapter activities, as well as receive information from the International Council
- Organize and motivate chapter members
- Ensure that queries from interested parties are answered
- Foster strong relationships with other Chapter Heads and support regional cooperation
- Provide direction and organization at the local level, ensuring that TST standards are upheld

EXHIBIT 3



AFFILIATION AGREEMENT

Parties: United Federation of Churches, LLC d/b/a THE SATANIC TEMPLE (“TST”)
519 Somerville Ave #288 Somerville, MA 02143

NAME: **Lilith Starr**

ADDRESS: [REDACTED] (the “AFFILIATE”)

Territory: **Seattle, Washington**

Dated as of: **May 30, 2016**

Background: TST owns or is the exclusive licensee for the content of the website www.thesatanictemple.com and all rights in and to the trade name, logo and trademark “THE SATANIC TEMPLE.” The Affiliate wants to affiliate with TST for the promotion of the purposes and objectives of TST and to use THE SATANIC TEMPLE in connection with its affiliation.

INTENDING TO BE LEGALLY BOUND, and in consideration of the mutual promises set forth hereinafter, the parties agree as follows:

1. DEFINITIONS.

"AFFILIATE" means any chapter of TST sanctioned by the National Council and Executive Ministry and/or any individual who is acting on behalf of TST sanctioned by the Executive Ministry.

“THE SATANIC TEMPLE” means the content of the website www.thesatanictemple.com (or any successor/subdomain website), any AFFILIATE Online Presence, any AFFILIATE Content and the trade name, logo and trademark commonly known as THE SATANIC TEMPLE, as well as all intellectual property.

“EXECUTIVE MINISTRY” means the corporate officers of TST. “EXECUTIVE MINISTRY” and “TST EXECUTIVE MINISTRY” may all be used interchangeably.

TST000115

“AFFILIATE Online Presence” means any domain name, sub domain, or other electronic address for the online presence of AFFILIATE for the Purpose, including without limitation, any web site, Facebook page, Twitter account or any other medium now existing or hereafter created to communicate by means of the internet and AFFILIATE Content.

“AFFILIATE Content” means any content or information distributed by or through AFFILIATE Online Presence and any personal property created by or at the direction of AFFILIATE that the displays or uses trade name, logo and trademark commonly known as THE SATANIC TEMPLE.

The “Purpose” means the promotion of the principles and objectives of TST as stated in www.thesatanictemple.com and such other written guidelines as TST may send to AFFILIATE, any and all of which TST may, in its sole discretion and from time to time alter, change, amend or delete. In addition, TST may, in its sole discretion and from time to time alter, change, amend or delete the terms of this agreement whereby notice of such changes must be sent to AFFILIATE whereby AFFILIATE has the option to accept these changes where no action is required, or they may opt to terminate the agreement whereby all prior terms agreed to that survive termination remain in effect.

The words “AFFILIATE” and “Chapter” may be used interchangeably.

2. GRANT OF LICENSE.

Subject to the terms and conditions set forth in this Agreement, TST hereby grants to AFFILIATE, and AFFILIATE hereby accepts, a non-exclusive license in the Territory to use THE SATANIC TEMPLE in connection with the Purpose. AFFILIATE shall not use THE SATANIC TEMPLE on or in connection with any goods or any service other than the Purpose or outside of the Territory.

AFFILIATE hereby grants TST a non-exclusive license in perpetuity worldwide to the use AFFILIATE Content for any and all purposes whatsoever including, without limitation, the right to modify or create derivative works from AFFILIATE Content.

3. QUALITY CONTROL.

AFFILIATE acknowledges and agrees that because of the extensive exposure and marketing of THE SATANIC TEMPLE, goodwill and reputation has become associated with THE SATANIC TEMPLE. In order to protect the aforesaid goodwill and reputation, AFFILIATE agrees as follows:

AFFILIATE agrees to submit to TST for its prior approval any notice and/announcement of any campaign, activism, or event held in the name of TST, which approval may be withheld in the sole discretion of TST.

All of the advertising and promotional material involving THE SATANIC TEMPLE shall be consistent with the quality and reputation heretofore associated with THE SATANIC TEMPLE. The Purpose shall be consistent with the quality and reputation heretofore associated with THE SATANIC TEMPLE. The use of THE SATANIC TEMPLE and promotion of the Purpose by AFFILIATE shall be rendered in accordance with all applicable federal, state and local laws and regulations.

AFFILIATE agrees to submit to TST for its prior approval any material bearing the trade name, logo and trademark THE SATANIC TEMPLE or any AFFILIATE Content, which approval may be withheld in the sole discretion of TST. Such material includes, but is not limited to, any material disseminated by print, video, film, music, website, email, social media, online, virtual or any other medium.

AFFILIATE agrees to work with other TST affiliates and to abide by any and all requests of the TST EXECUTIVE MINISTRY and the TST NATIONAL COUNCIL ("NC) whose purpose is to review the activities of TST affiliates, provide mutual support and develop standards, protocols, and best practices for affiliates

AFFILIATE must name one or more persons other than AFFILIATE who will act as chapter liaisons to communicate with the media in the event of any kind of outreach by or to AFFILIATE. AFFILIATE names: **Tarkus Claypool** as their Chapter Media Liaison. This/these person(s) can be reached by email: **tarkus.claypool@gmail.com** or by phone: **(509) 850-0287**. Should there be a change in liaison or change in contact information of the existing liaison, AFFILIATE will immediately notify TST and the NC with the updated information.

4. AFFILIATE ONLINE PRESENCE AND CONTENT.

a. TST may, at its own expense, obtain, own and control any domain name or other necessary electronic address for any AFFILIATE Online Presence. TST will use commercially reasonable efforts to obtain a domain name that reflects the Territory and affiliation with TST, e.g. www.thesatanictempledetroit.com. TST may distribute or disseminate any information or content using AFFILIATE Online Presence in its sole discretion.

b. AFFILIATE shall be responsible, at its own expense for the creation and distribution of any AFFILIATE Content. AFFILIATE shall comply with all laws in the creation and distribution of the AFFILIATE Content, including, without limitation, federal copyright and trademark law and the common law of slander and defamation. Content must comply with the standards, tenets, philosophy, and spirit of TST.

c. AFFILIATE shall email or otherwise send any and all images and footage that it takes, or directs others to take, from events and activities AFFILIATE organizes to TST within thirty (30) days of said event or activity. TST will use, at its sole discretion, images and footage to further the mission of TST and AFFILIATE agrees that, in exchange for the mutual representations made in this AGREEMENT, TST has the right in perpetuity to use any and all images and

footage AFFILIATE sends to TST in any way TST sees fit including commercial use and grants TST the right to license images and footage to third parties for the exclusive benefit of TST.

5. AFFILIATE MERCHANDISING. AFFILIATE may not use the trade name, logo and trademark commonly known as THE SATANIC TEMPLE on merchandise to be sold to the public unless a separate agreement is made in writing between TST and AFFILIATE.

6. PROTECTION OF THE SATANIC TEMPLE.

a. AFFILIATE acknowledges and agrees that:

AFFILIATE shall acquire no ownership rights to THE SATANIC TEMPLE by virtue of this Agreement or otherwise and that all such uses by AFFILIATE of THE SATANIC TEMPLE shall not affect the validity of THE SATANIC TEMPLE or any registration.

AFFILIATE shall not during the term of this Agreement or at any time thereafter, directly or indirectly, contest or aid others in contesting TST's ownership of THE SATANIC TEMPLE for the licensed services or any related goods or services.

AFFILIATE shall not, during the term of this Agreement or thereafter, do anything that impairs TST's ownership of, the validity of or the reputation of THE SATANIC TEMPLE.

b. In the event AFFILIATE shall become aware of any infringement by third parties of any right licensed herein or any other use of THE SATANIC TEMPLE, AFFILIATE shall promptly notify TST in writing of such infringement or use, and shall do such acts and assist and supply such information as are reasonably necessary or desirable in relation thereto.

TST shall take steps which, in its sole discretion, are necessary to enforce its rights, including the engagement of legal counsel of its own choosing. Nothing herein shall obligate TST to take any action against any allegedly infringing party.

c. Upon TST's request, AFFILIATE will cooperate fully, at TST's expense, in confirming, perfecting, preserving and enforcing TST's rights in THE SATANIC TEMPLE.

7. CONFIDENTIALITY. AFFILIATE shall keep confidential and not disclose to any person any information provided by TST without the prior written consent of TST which may be withheld in its sole discretion. Confidential information includes but is not limited to identifying information regarding any member or the procedures, creation, use or modification of THE SATANIC TEMPLE. This obligation does not apply to information other than AFFILIATE Content (1) already known by AFFILIATE without an obligation of confidentiality, (2) publicly known or becomes publicly known through no unauthorized act of AFFILIATE, (3) rightfully received from a third party, (4) independently developed by AFFILIATE without use of TST's information, or (5) approved by the other party for disclosure, or (6) required to be disclosed pursuant to a requirement of a governmental agency or law so long as AFFILIATE provides advance notice to TST with sufficient time to enable TST to contest such disclosure. This paragraph shall survive the termination of the agreement.

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TST000118

8. ASSIGNMENTS. Neither AFFILIATE, nor any of its permitted successors or assigns, may, directly, by operation of law, by merger or otherwise, assign, hypothecate, pledge, sublicense or transfer this Agreement or any of its rights or obligations hereunder, except with the written permission of TST which may be withheld in the sole discretion of TST. TST may assign, hypothecate, pledge or transfer all or any part of this Agreement or TST's rights or obligations hereunder to any person.
9. TERM AND TERMINATION. The term of this agreement is "at will" and TST may terminate this Agreement on notice for any reason within its sole discretion.
10. EFFECT OF TERMINATION. Upon the termination of this Agreement for any reason, all rights granted to AFFILIATE hereunder shall revert to TST and AFFILIATE may no longer use THE SATANIC TEMPLE for any purpose and in any manner.
11. INDEMNIFICATION. AFFILIATE will indemnify and hold TST harmless from any costs, expenses or damages, including without limitation any reasonable attorney fees and expenses, arising out of any breach by AFFILIATE of this Agreement. If the defense of TST by an attorney is required pursuant to this indemnification, TST shall select the attorney(s) subject to AFFILIATE's approval, not to be unreasonably withheld or delayed and may settle or compromise any claim(s) against TST, subject to AFFILIATE's approval not to be unreasonably withheld or delayed.
12. MISCELLANEOUS.
- a. This agreement constitutes the entire agreement between the parties with respect to its subject matter and supersedes and all other agreements either in writing or verbally. Any amendment to this agreement must be in writing.
 - b. The headings in this agreement are inserted for convenience and shall not be construed as a part of this Agreement.
 - c. This agreement shall be binding upon the parties, their successors, related companies and affiliates and permitted assigns.
 - d. This agreement may not be altered except in a writing signed by the parties hereto. The failure to enforce any of the terms and conditions of this agreement by either party shall not be deemed a waiver of any other right or privilege under this agreement.

This agreement may be signed in two or more counterparts, each of which shall be an original and which collectively shall constitute the full and complete agreement.

e. This agreement shall be interpreted according to the laws of Massachusetts without regard to any conflicts of laws principles. Jurisdiction of any action arising out or related to this agreement shall be solely in Massachusetts and AFFILIATE consents to the jurisdiction of the courts of Massachusetts in any such action.

f. Notice shall be given the parties at the address noted above or by email or fax. Notice shall be deemed received upon actual receipt or, in the case of notice by certified mail, three days after the mailing of notice by certified mail, return receipt requested to the party's last known address.

IN WITNESS WHEREOF, each party has caused this agreement to be executed allied or, as appropriate, by its duly authorized representative.

United Federation of Churches, LLC
d/b/a The Satanic Temple

Affiliate

By: *Russ SARR*

By: _____

Date: 5-30-2016

Date: _____

EXHIBIT 4

[tst-washington] TST WA Allies group on Facebook^{Inbox}



Sat, Mar 14, 2020,
7:48 PM

Siri Sanguine

<sirisanguine@gmail.com>

[Unsubscribe](#)

to tst-washington

Good evening,

It has be brought to our attention that Lenore Calavera has stolen our FB page TST WA Allies and renamed it "evergreen memes for queer satanic fiends". I have informed our contacts at IC and are awaiting advice on next steps.

Due to this rogue behavior Lenore is not longer to be considered a member of TST WA and will be placed on the National list of banned members for their theft.

Thank you,

Siri

TST000151

EXHIBIT 5

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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 Meeham, and Nathan
Sullivan,

Defendants.

Case No. 23-2-06120-9

**PLAINTIFF’S AMENDED AND
SUPPLEMENTAL RESPONSES TO
DEFENDANTS’ FIRST
INTERROGATORIES**

INTERROGATORIES

INTERROGATORY NO. 1: Please identify every person you believe has knowledge or information related to the allegations made in your Complaint, noting the person’s last known contact information and what knowledge you believe that person has.

ANSWER:

- Defendants, who may be contacted through their attorneys, have discoverable knowledge pertaining to their prior agency for Plaintiff, the theft of the Allies Page, the theft of the Chapter Page, and all profits they have derived from operating either account.

PLAINTIFF’S AMENDED AND SUPPLEMENTAL
RESPONSES TO DEFENDANTS’ FIRST INTERROGATORIES

Lybeck Pedreira & Justus, PLLC
Fifth Floor – Chase Bank Building
7900 SE 28th Street
Mercer Island, WA 98040-6004
206-230-4255 Fax 206-230-7791

1 what documents belonging to the Washington Chapter or the United Federation of Churches,
2 LLC were allegedly in Sullivan’s possession or to seek the return of any documents allegedly
3 in Sullivan’s possession.

4 **ANSWER:** Tarkus Claypool, then-Media Liason for the Washington Chapter,
5 exercised the ability of recollection that the membership onboarding documents which he
6 could no longer access were under the administrative control of Sullivan, who collected the
7 documents as part of his role as leader of the new member team. Given that Sullivan’s job
8 was to retain these documents, and given that Sullivan was part of the cohort that abused
9 administrative controls to steal the two social media accounts at issue, the membership
10 documents must be under Sullivan’s control. As to the efforts to seek the return of these
11 documents, Plaintiff issued three complaints at law which sought injunctive relief to require
12 Sullivan to return all membership documents in his possession and served Sullivan with the
13 same.

14
15 **INTERROGATORY NO. 17:** Describe all facts and circumstances that support the allegation
16 in paragraph 46 of your Complaint that Defendants have used an electronic database of the
17 TST-Washington membership to harass TST’s membership through the internet, including
18 identifying the alleged electronic database and when and how it was allegedly used by
19 Defendants.

20 **ANSWER:** This information will be procured from Sullivan’s truthful testimony.
21 Plaintiff reserves the right to amend and supplement this response based on future
22 investigation and discovery.

23
24 **INTERROGATORY NO. 18:** Describe all facts and circumstances that support the
25 allegations in paragraphs 40-41 of your Complaint that the statements in Johnson’s “manifesto”
26 were false.

1 United Federation of Churches, LLC who were responsible for the relationship with Facebook
2 relating to the Chapter Page or Allies Page.

3 **ANSWER:** The Affiliation Agreement, under which Tarkus Claypool and Siri
4 Sanguine had the lawful authority to operate the Washington Chapter and the Chapter Page
5 and the Allies page, reserved all ownership rights to the Temple.

6
7 **INTERROGATORY NO. 24:** For all the damages claimed in the Complaint, identify the
8 nature and amount of the damages and describe in detail all facts and circumstances upon
9 which you will rely to establish each type of damages, the causal link between the alleged
10 damages and cause of action, the amount of the alleged damages, and include all facts that
11 establish that the damages were incurred by the United Federation of Churches, LLC as
12 opposed to the Washington Chapter.

13 **ANSWER:** The quantum of monetary damages are currently unknown to Plaintiff and
14 are to be determined through discovery. The valuation of damages will be determined by the
15 jury's valuation of: the current value of the Allies Page, all profits derived therefrom,
16 Defendants' temporary use of the Chapter Page, and punitive damages.

17
18 **INTERROGATORY NO. 25:** Describe the duties, authority, and reporting lines of the
19 Washington Chapterhead from 2014 to the present, including the "administrative authority"
20 described in paragraph 14 of your Complaint, and explain who determines and controls the
21 scope of the Chapterhead's authority. If the duties, authority, or reporting lines have changed
22 over that time period, identify when and in what way.

23 **ANSWER:** Plaintiff objects to the time-scope relevance of this interrogatory. The
24 relevant timeframe is not from 2014 to present but from September 2018 - March 22, 2020.
25 Subject to and without waiving this objection, see Affiliation Agreements for Siri Sanguine and
26

1 **INTERROGATORY NO. 31:** Identify each person you expect to call as an expert witness
2 at trial and explain in detail their qualifications and the substance of the facts and opinions to
3 which the person is expected to testify.

4 **ANSWER:** This information will be timely provided under the scheduling order.

5
6 **INTERROGATORY NO. 32:** Have any of your documents or communications, including
7 emails or text messages, social media posts, or other electronic documents or communications
8 that relate to the facts or circumstances at issue in the Lawsuit, or the Lawsuit itself, been
9 destroyed? If so, include in your answer the identity of the documents or communications,
10 including the sender and recipient of each communication, the date and content thereof, the
11 date the document or communication was destroyed, and the reason for the destruction.

12 **ANSWER:** No.

13
14 **INTERROGATORY NO. 33:** Identify with specificity all efforts by the Washington
15 Chapter, the United Federation of Churches, LLC or any attorney, individual or entity
16 associated with or representing either organization to monitor the Defendants' social media
17 posts, media statements, or public statements. Identify, specifically, all agreements, contracts
18 or arrangements with third parties to monitor the Defendants' social media posts, media
19 statements, or public statements, including the identity of such third party.

20 **ANSWER:** Plaintiff objects to this request under the work product doctrine.

21 DATED: August 9, 2024

22 **LYBECK PEDREIRA & JUSTUS, PLLC** **KEZHAYA LAW PLC**

23 By: /s/ Benjamin Justus
24 Benjamin Justus, WSBA No. 38855
25 Attorney for Plaintiff
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PLAINTIFF'S AMENDED AND SUPPLEMENTAL
RESPONSES TO DEFENDANTS' FIRST INTERROGATORIES

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EXHIBIT 6

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

UNITED FEDERATION OF CHURCHES, LLC (DBA “THE SATANIC TEMPLE”),)	No. 20-cv-509
)	
Plaintiff,)	COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF
)	
v.)	
)	
DAVID ALAN JOHNSON (AKA “ADJ”),)	
LEAH FISHBAUGH, MICKEY)	
MEEHAM, AND NATHAN SULLIVAN,)	
)	
Defendants.)	

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

I. PREAMBLE

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

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

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

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

II. JURISDICTION AND VENUE

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

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

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

III. PARTIES

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

8. 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.
- (7) 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.

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

9. TST's mission 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." See "Our mission" available at <https://www.thesatanictemple.org/our-mission.html>.

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

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

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

13. 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.

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

TST, who aided and abetted the hacking. 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.

15. 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.

16. 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.

IV. FACTUAL BACKGROUND

17. 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.

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

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

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

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

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

23. In October of 2014, the Washington Chapter business page was created exclusively for the benefit of TST in its efforts to disseminate information for what was then the Seattle Chapter. This page, in its current state, is available at <https://www.facebook.com/thesatanictemplewashington> (content predating March 20, 2020). *See also Exhibit 2* (Chapter page history)

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

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

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

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

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

Public statements & interactions with med

All public actions and statements must be approved and vetted by the TST National 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.

...

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.

...

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.

...

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 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 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.

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

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

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

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

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

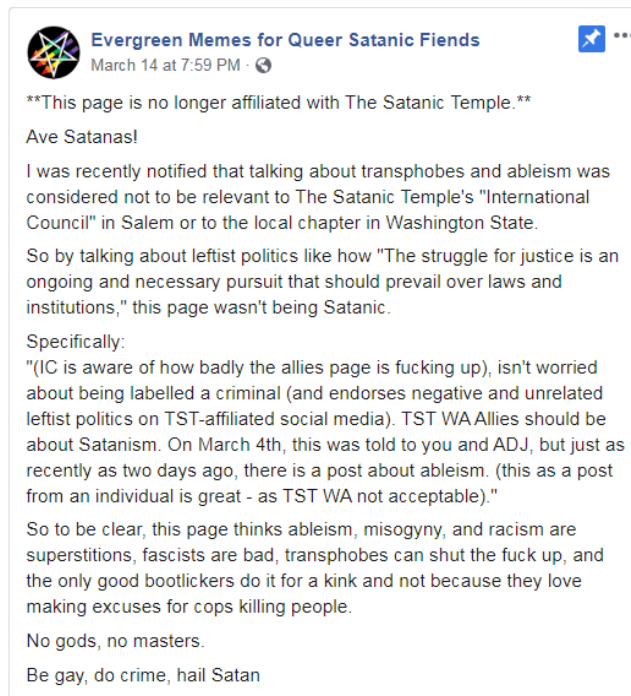
33. Defendants were each well aware of the Code of Conduct because it served as a source of friction leading up to the events giving rise to this litigation. For example, on March 2, 2020, Johnson shared the following post on the Allies page outside of his authority:



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

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

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



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

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

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

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

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

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

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

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

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

45. "Antifa" is a left-wing political movement with a penchant for violence.

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

47. The Chapter page maintains its original URL:

<https://www.facebook.com/TheSatanicTempleWashington/>.

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

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

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

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

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

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

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

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

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

III. CAUSES OF ACTION

Count 1:

CFAA violation

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

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

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

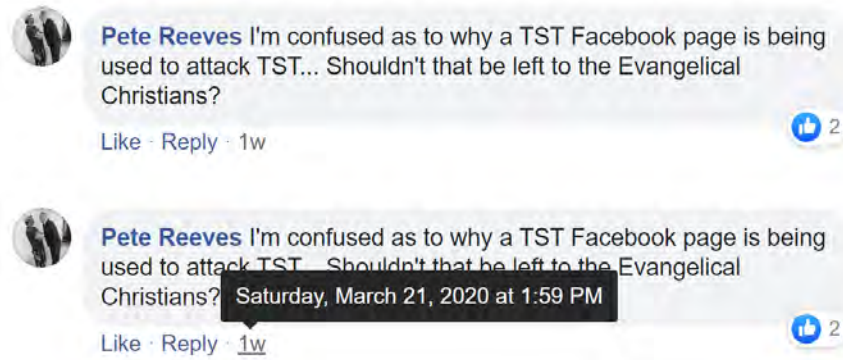
59. Websites have been recognized as a “protected computer” within the meaning of the CFAA. *See United States v. Drew*, 259 F.R.D. 449, 457-58 (C.D. Cal. 2009).

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

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

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

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



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

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

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

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

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

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

Count 2:

Cyberpiracy

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

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

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

70. TST holds the exclusive rights to the name "The Satanic Temple." **Exhibit 1.**

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

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

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

Count 3:

Tortious interference with business expectancy

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

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

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

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

77. 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.

78. 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.

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

Count 4:

Violations of the Consumer Protection Act

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

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

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

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

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

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

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

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

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

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

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

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

Count 5:

Defamation

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

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

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

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

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

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

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

IV. PRAYER FOR RELIEF

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

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

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

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

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

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

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

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

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

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

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

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

Respectfully submitted this 3rd day of April, 2020.

LYBECK PEDREIRA & JUSTUS, PLLC

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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

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Serial Number 86221887

Filing Date March 14, 2014

Current Basis 1A

Original Filing Basis 1A

Date Amended to Current Register December 17, 2014

Registration Number 4686134

Registration Date February 10, 2015

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

Attorney of Record Daryl Abbas

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Exhibit 2


TST's Washington Chapter Facebook page history


Page Transparency for Satanic Washington State - Archived Temple Chapter


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

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



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

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

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

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


Exhibit 3

TST's Washington Chapter Allies Facebook page history

Page Transparency for Evergreen Memes for Queer Satanic Fiends

Summary **Page History**

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



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

Find Support or Report Page Close



The Satanic Temple of Washington

Membership Agreement and Code of Conduct

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

I. INTRODUCTION

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

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

II. MEMBERS

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

III. THE SEVEN TENETS

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

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

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

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

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

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

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

IV. VALUES

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

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

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

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

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

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

V. ADDITIONAL GUIDELINES FOR BEHAVIOR

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

Public statements & interactions with media:

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

Public actions: Protestors and law enforcement:

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

Confidentiality:

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

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

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

Health & Safety:

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

Public Harassment:

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

General Decorum:

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

VI. ONLINE CODE OF CONDUCT

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

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

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

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

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

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

VII. FILING A COMPLAINT

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

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

b. Formal Process

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

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

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

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

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

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

Member Signature

Date

Print member name

New Member Team Signature

Date

Satanic Washington State - Archived Temple Chapter

March 21 at 12:34 AM ·

Well, I think I gave them long enough.

- - -

Hail Satan! This is ADJ.

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

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

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

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

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

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

3/31/2020

Satanic Washington State - Archived Temple Chapter Posts

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

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

No gods, no masters.

Be gay, do crime, hail Satan

52

92 Comments 6 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 1:40 AM ·

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



VILLAGEVOICE.COM

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

16

10 Comments 2 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:22 AM ·

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



MEDIUM.COM

Why I'm Leaving The Satanic Temple

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

44

60 Comments 10 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:24 AM ·

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



MEDIUM.COM

"The Struggle for Justice is Ongoing"

On my departure from The Satanic Temple

12

1 Comment 1 Share

Satanic Washington State - Archived Temple Chapter

March 21 at 12:25 AM ·

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

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

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

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

 via instagram.com

31

12 Comments

Satanic Washington State - Archived Temple Chapter

March 21 at 12:27 AM ·

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



MEDIUM.COM

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

12

1 Comment 3 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:29 AM ·

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



MEDIUM.COM

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

11

1 Share

Satanic Washington State - Archived Temple Chapter

March 21 at 12:36 AM ·

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

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



Satanic Washington State - Archived Temple Chapter

March 21 at 12:38 AM ·

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



MEDIUM.COM

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

10

Satanic Washington State - Archived Temple Chapter

March 21 at 12:40 AM ·

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



MEDIUM.COM

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

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

21

2 Comments 6 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:46 AM ·

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

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



31

74 Comments 5 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:50 AM ·

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

\$130 for a robe. Wild.

^ADJ

--

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



WEB.ARCHIVE.ORG

The Satanic Temple's Position on Contemporary Issues

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

10

1 Comment 2 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:55 AM ·

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

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

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

^ADJ



Lucien Greaves

March 14, 2016 ·

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

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

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

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

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

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

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

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 #DeusVolt #SatanicCrusade to #FreePalestine

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

Satanic Washington State - Archived Temple Chapter

March 21 at 1:55 AM ·

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

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

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

^ADJ

- - -

From the official media training guide:
[Don't answer] Yes or no questions.

Question:

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

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

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

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

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

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

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

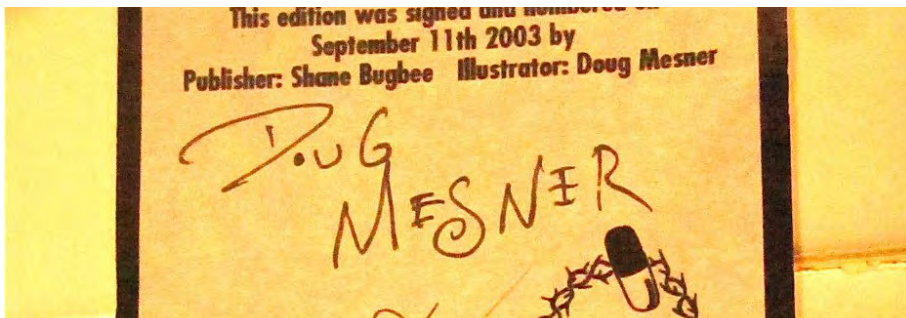
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their terms. Instead, say something like: "I can't speak to something that ha
is incredibly inclusive and we welcome members from all walks of life."





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 Satanus, 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/heresyquad/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!



Hon. Richard A. Jones

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

United Federation of Churches, LLC (dba "The Satanic Temple"))	Case No. 2:20-cv-00509-RAJ
)	
Plaintiff,)	FIRST AMENDED COMPLAINT
)	FOR DAMAGES AND
v.)	INJUNCTIVE RELIEF
)	
David Alan Johnson (AKA "ADJ"),)	
Leah Fishbaugh, Mickey Meeham, and)	
Nathan Sullivan,)	
)	
Defendants.)	

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

I. PREAMBLE

1. This case is about two hacked social media accounts and failed attempts at hacking a different social media account and an email account. TST is suing Defendants for misappropriating two of TST's Facebook business pages by replacing all approved administrators with themselves. Shortly after the misappropriation, Johnson started posting content critical of TST from TST's own webpage while retaining the original branding. Later, Johnson modified the name of the website, ostensibly to create a competitor organization, while appending the suffix "Archive Temple Chapter."

2. Since entry of the original complaint, the Court entered an order dismissing parts

of this case without prejudice and parts with prejudice. Dkt. # 20. The parts dismissed without prejudice are the subject of the amendments in this complaint.

(1) As to Count 1 (CFAA), the facts are further developed to state when the revocation occurred, how that revocation was communicated, and what actions Defendants undertook afterwards. Compare Dkt. # 20 at pp. 7-9.

(2) As to former Count 3 (tortious interference with business expectancy), the facts are further developed to state the factual underpinnings for how Defendants knew about the Facebook pages' pecuniary value and how the interference was wrongful beyond the interference itself. Compare Dkt. # 20 at p. 15. This count is renumbered to Count 2 in light of the order of dismissal with prejudice of former Count 2 (Cyberpiracy).

(3) As to former Count 4 (Washington Consumer Protection Act), that claim is replaced with a trespass to chattel claim (Count 3) and a conversion claim (Count 4). Compare Dkt. # 20 at pp. 16-17.

3. The Cyberpiracy and Defamation counts have been removed from this First Amended Complaint in compliance with the orders of dismissal with prejudice. To the extent the Court may grant Plaintiff's now-pending Motion for Reconsideration, Dkt. # 21, Plaintiff reserves the right to file a second amended complaint to reassert whichever claims the order of reconsideration may revive.

4. Since the filing of the original complaint, the rightful Washington Chapter leadership has reclaimed the Facebook page. This moots the need of injunctive relief to return the website to its rightful owners, but does not moot the need of injunctive relief to refrain from future unauthorized access, money damages, or attorney's fees and costs.

II. JURISDICTION AND VENUE

5. This Court has original jurisdiction over the federal claim arising under the CFAA. 28 U.S.C. § 1331 (federal question); 18 U.S.C. § 1030(g) (CFAA). The Court has supplemental

jurisdiction over the state common law claims arising from the same facts. 28 U.S.C. § 1367.

6. The Court can properly exercise general personal jurisdiction over each Defendant because they live in Seattle, Washington which is in this District. The Court can properly exercise specific personal jurisdiction over each Defendant because their actions took place in Seattle, Washington which is in this District.

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

III. PARTIES

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

9. 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.
 - (7) 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.

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

10. TST’s mission 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.” See “Our mission” available at <https://www.thesatanictemple.org/our-mission.html>.

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

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

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

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

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

16. The Media Liaison promotes the Washington Chapter’s activities to the general public.

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

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

19. 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.

20. 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.

21. 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.

22. 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

23. 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.

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

25. Google is a ubiquitous internet-based information platform. Among its many services, Google provides an email platform ("gmail") and a cloud-based document creation and storage platform ("Google Drive.")

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

27. At the relevant time, Twitter was the Washington Chapter's secondary platform of communicating with its membership.

28. TST's Washington Chapter has a Google account to generally facilitate its organizational purposes by creating and storing documents.

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

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

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

32. In September of 2018, the Washington Chapter created a secondary Facebook page, named "TST WA Allies," to facilitate communications with individuals who were interested in TST but did not want to identify as a member. Since the original complaint, the Allies page appears to have been deleted. See *id.*, in its current state, available at <https://www.facebook.com/queersatanicmemes>; see also **Exhibit 3** (deleted page).

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

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

Public statements & interactions with media

All public actions and statements must be approved and vetted by the TST National 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.

...

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.

...

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.

...

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 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 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.

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

35. The above written instructions form the contours of administrators’ authorization to access TST’s social media accounts.

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

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

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

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



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

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

42. "Organizational failures," as used above, particularly included:

- (1) Repeatedly operating TST's social media to endorse leftist politics as opposed to Satanism, despite repeated reminders that this was unacceptable;
- (2) Failing to attend a particular meeting to address the above issue; and
- (3) Failing to initiate, conceive, or execute any publicity for the Washington

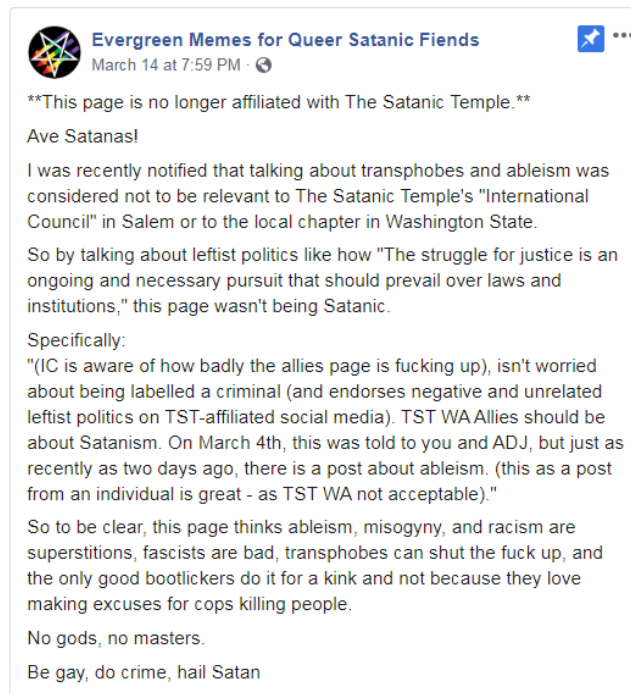
Chapter's Prayer for Plurality event, which was a matter of organizational significance.

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

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

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

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



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

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

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

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

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

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

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

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

55. Instead, Johnson spent the next couple of days posting links and commentary from the Chapter page, all with the general, and false, theme that TST leaders are incompetent fascists. See **Exhibit 8** (posts and commentary in excess of authorization). The links and commentary all exceeded Johnson's grant of authority as defined in the Code of Conduct, disregarded the revocation of authority entailed in being removed from the position on the advisory council, disregarded the explicit revocation of authority entailed in having his administrative access to the Chapter page removed, and disregarded the explicit cease and desist demand referenced in ¶ 54.

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

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

social media administrative access revoked, and disregarded the explicit cease and desist demands referenced in ¶¶ 45.

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

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

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

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

62. As of the original complaint, TST's Washington Chapter lost between 20 and 30 members because of Johnson's false claims published to the Chapter page.

63. Facebook refused to correct the matter, mislabeling the issue as a "Page admin issue" to the exclusion of "infringements of your legal rights."

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

65. Johnson ignored the letter and, together with his co-Defendants, continued to maintain exclusive control over the Chapter page. In so doing, Johnson and his co-Defendants 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

media administrative access revoked, and disregarded the explicit cease and desist demands referenced in ¶¶ 45 and 64.

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

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

68. TST was able to recover the Twitter account and the email account through Twitter and Google, respectively.

III. CAUSES OF ACTION

Count 1:

CFAA violation

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

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

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

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

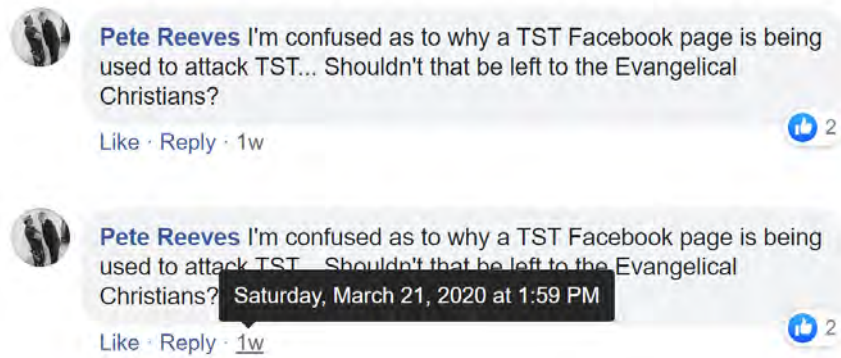
73. Websites have been recognized as a “protected computer” within the meaning of the CFAA. See United States v. Drew, 259 F.R.D. 449, 457-58 (C.D. Cal. 2009).

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

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

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

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



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

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

78. 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 those communications help to foster the kind of relationship that 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 3 at p. 4.

79. Further compounding the losses are TST’s attorney’s fees for investigating this

matter, entering futile demands for corrective action: both of Facebook and from Defendants, and drafting this complaint. TST will continue to incur losses in the costs and fees related to this lawsuit. TST's costs and attorney's fees will exceed the \$6,000 incurred in researching and drafting the original complaint.

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

81. 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" (i.e. any internet-based media) under threat of contempt, economic damages of at least \$48,973.92, and costs and attorney's fees to be computed after entry of the decree.

Count 2:

Tortious interference

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

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

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

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

86. 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.

87. 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 those communications help to foster the kind of relationship that 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 3 at p. 4.

88. 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. The contemplated and intentional purpose of so doing was to diminish TST's membership and donation base.

89. 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.

90. 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, punitive damages, and costs and attorney's fees to be computed after entry of the decree.

Count 4:

Trespass to chattels

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

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

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

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

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

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

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

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

99. 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, an order to return TST's membership related documents and destroy any copies thereof, an order for punitive damages, and costs and attorney's fees to be computed after entry of the decree.

Count 5:

Conversion

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

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

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

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

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

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

IV. PRAYER FOR RELIEF

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

(1) Defendants shall, jointly and severally, immediately return full control to counsel for

Plaintiff under threat of contempt: all TST materials, whether in paper or electronic format, including without limitation: all signed agreements, all membership listings, all internal policies and procedures, all governance documentation, any branding materials, and any other document created by or for the benefit of TST.

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

(3) Defendants shall, jointly and severally, pay economic to Plaintiff in the amount of \$42,973.92.

(4) Defendants shall, jointly and severally, pay statutory damages to Plaintiff in the amount of \$100,000.

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

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

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

Respectfully submitted this 29th day of March, 2021.

LYBECK PEDREIRA & JUSTUS, PLLC

By: /s/ Benjamin Justus
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479.431.6112 /ph 479.282.2892 /fax
matt@kezhaya.law / email Kezhaya

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of March, 2021, I electronically filed the foregoing FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

Dated at Seattle, Washington, the 29th day of March, 2021.

By: /s/ Benjamin Justus
Benjamin Justus



United States Patent and Trademark Office

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Trademarks > Trademark Electronic Search System (TESS)

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

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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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FIRST DOC	PREV DOC	NEXT DOC	LAST DOC							

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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



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.

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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

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16



Nathan Von Sullivan

March 15 ·

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

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

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

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

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

Friend Requests

See All



Lillith Allstar

30 mutual friends

Confirm

Delete

Suggested Pages

See All



Satanic Temple of Myrtle Beach

David and 24 other friends like this.

Like



The Satanic Temple - Arizona Chapter - North

Ashema and 21 other friends like this.

Like

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Home

Create

2

16



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

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

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

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

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

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

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Comment



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

Imao do words even mean anything

Like · Reply · 8w

7



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

Like · Reply · 8w

4



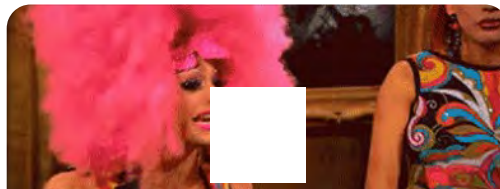
Nathan Von Sullivan ThAt Is An InSuLt

Like · Reply · 8w

2



A David Johnson Nathan Von Sullivan



TENOR

Like · Reply · 8w

2



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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 Bleeblespot Rosenberg Welp

Time to found your own

Like · Reply · 8w

4



Nathan Von Sullivan three steps ahead of you

Like · Reply · 8w

2



Martin Bleeblespot 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

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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



Synner-gy

Home

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16



Like · Reply · 8w

1



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

Like · Reply · 8w

7



Verona Cruz replied · 3 Replies



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

Like · Reply · 8w

4



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

Like · Reply · 8w

3



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

Like · Reply · 8w

1



Lori Erickson replied · 2 Replies



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

Like · Reply · 7w · Edited

4



Nathan Von Sullivan replied · 1 Reply



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

Like · Reply · 7w

1



Write a comment...

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 cisnet 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

3/31/2020

Case 2:20-cv-00500-RWD Document 13-1 Filed 03/31/20 Page 1 of 1



Tarkus Claypool <tarkus.claypool@gmail.com>

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

Tarkus Claypool <tarkus.claypool@gmail.com> Fri, Mar 20, 2020 at 11:29 PM

To: David Johnson <somedavidjohnson@gmail.com>

Cc: Siri Sanguine <sirisanguine@gmail.com>, Chalice Blythe <chaliceblythe@gmail.com>, Lilitx Starr <lilitxstarr@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 Satanus,
-Tarkus Claypool
Media Liaison, The Satanic Temple of Washington
(he/him)

--

CONFIDENTIALITY NOTICE

The content of this email is confidential and intended only for those parties who received the email directly from the tarkus.claypool@gmail.com address. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender.

[Quoted text hidden]

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

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.

10

Satanic Washington State - Archived Temple Chapter

March 21 at 12:40 AM ·

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



MEDIUM.COM

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

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

21

2 Comments 6 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:46 AM ·

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

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



31

74 Comments 5 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:50 AM ·

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

\$130 for a robe. Wild.

^ADJ

--

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

WEB.ARCHIVE.ORG

The Satanic Temple's Position on Contemporary Issues

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

10

1 Comment 2 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:55 AM ·

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

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

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

^ADJ



Lucien Greaves

March 14, 2016 ·

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

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

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

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

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

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

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

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 #DeusVolt #SatanicCrusade to #FreePalestine

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

Satanic Washington State - Archived Temple Chapter

March 21 at 1:55 AM ·

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

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

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

^ADJ

- - -

From the official media training guide:

[Don't answer] Yes or no questions.

Question:

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

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

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

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

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

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

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

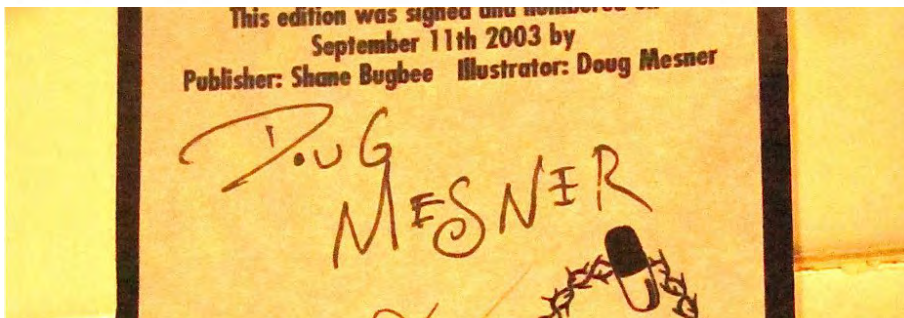
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White Suprememcist book, the TST spokesperson said 'yes.'"

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."





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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 Satanus, 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/heresyquad/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!



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MATT@KEZHAYA.LAW

March 23, 2020

Mr. David Alan Johnson

By email only to somedavidjohnson@gmail.com

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

Mr. Johnson,

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

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

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

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'MK', with a long horizontal flourish extending to the right.

Matthew A. Kezhaya

Hon. Richard A. Jones

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

United Federation of Churches, LLC (dba "The Satanic Temple"))	Case No. 2:20-cv-00509-RAJ
)	
Plaintiff,)	SECOND AMENDED
)	COMPLAINT FOR DAMAGES
v.)	AND INJUNCTIVE RELIEF
)	
David Alan Johnson (AKA "ADJ"),)	
Leah Fishbaugh, Mickey Meeham, and)	
Nathan Sullivan,)	
Defendants.)	

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

I. PREAMBLE

1. This case is about two hacked social media accounts and failed attempts at hacking a different social media account and an email account. TST is suing Defendants for misappropriating two of TST's Facebook business pages by replacing all approved administrators with themselves. Shortly after the misappropriation, Johnson started posting content critical of TST from TST's own webpage while retaining the original branding. Later, Johnson modified the name of the website, ostensibly to create a competitor organization, while appending the suffix "Archive Temple Chapter."

2. Since entry of the original complaint, the Court entered an order dismissing parts

1 of this case without prejudice and parts with prejudice. Dkt. # 20. The parts dismissed without
2 prejudice are the subject of the amendments in this complaint.

3 (1) As to Count 1 (CFAA), the facts are further developed to state when the
4 revocation occurred, how that revocation was communicated, and what
5 actions Defendants undertook afterwards. Compare Dkt. # 20 at pp. 7-9.

6 (2) As to former Count 3 (tortious interference with business expectancy), the
7 facts are further developed to state the factual underpinnings for how
8 Defendants knew about the Facebook pages' pecuniary value and how the
9 interference was wrongful beyond the interference itself. Compare Dkt. # 20
10 at p. 15. This count is renumbered to Count 2 in light of the order of dismissal
11 with prejudice of former Count 2 (Cyberpiracy).

12 (3) As to former Count 4 (Washington Consumer Protection Act), that claim is
13 replaced with a trespass to chattel claim (Count 3) and a conversion claim
14 (Count 4). Compare Dkt. # 20 at pp. 16-17.

15 3. The Cyberpiracy and Defamation counts have been removed from this First
16 Amended Complaint in compliance with the orders of dismissal with prejudice. To the extent
17 the Court may grant Plaintiff's now-pending Motion for Reconsideration, Dkt. # 21, Plaintiff
18 reserves the right to file a second amended complaint to reassert whichever claims the order of
19 reconsideration may revive.

20 4. Since the filing of the original complaint, the rightful Washington Chapter
21 leadership has reclaimed the Chapter page through Facebook. This moots the need of injunctive
22 relief to return the Chapter website to its rightful owners. This controversy is still live, however,
23 because TST still needs: injunctive relief for Defendants to return the Allies page, to preclude
24 Defendants from future unauthorized access of TST's electronic materials, to return TST's
25 wrongfully detained membership documents, and as otherwise appropriate to prevent the creation
26 of other counterfeit materials; money damages; and attorney's fees and costs of this action.

1 **II. JURISDICTION AND VENUE**

2 5. This Court has original jurisdiction over the federal claim arising under the CFAA.
3 28 U.S.C. § 1331 (federal question); 18 U.S.C. § 1030(g) (CFAA). The Court has supplemental
4 jurisdiction over the state common law claims arising from the same facts. 28 U.S.C. § 1367.

5 6. The Court can properly exercise general personal jurisdiction over each Defendant
6 because they live in Seattle, Washington which is in this District. The Court can properly exercise
7 specific personal jurisdiction over each Defendant because their actions took place in Seattle,
8 Washington which is in this District.

9 7. Venue properly lies with this Court because the hacking took place in Seattle,
10 Washington. 28 U.S.C. § 1391.

11 **III. PARTIES**

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

14 9. TST subscribes and advances seven fundamental tenets:

- 15 (1) One should strive to act with compassion and empathy toward all creatures
16 in accordance with reason.
- 17 (2) The struggle for justice is an ongoing and necessary pursuit that should
18 prevail over laws and institutions.
- 19 (3) One’s body is inviolable, subject to one’s own will alone.
- 20 (4) The freedoms of others should be respected, including the freedom to
21 offend. To willfully and unjustly encroach upon the freedoms of another is
22 to forgo one's own.
- 23 (5) Beliefs should conform to one's best scientific understanding of the world.
24 One should take care never to distort scientific facts to fit one's beliefs.
- 25 (6) People are fallible. If one makes a mistake, one should do one's best to
26 rectify it and resolve any harm that might have been caused.
- (7) 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.

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

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

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

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

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

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

16 15. The Chapterhead has administrative authority over the Washington Chapter and,
17 until March 12, 2020, was assisted by an advisory council.

18 16. The Media Liaison promotes the Washington Chapter’s activities to the general
19 public.

20 17. Defendants were councilors on the advisory council to the Chapterhead. On
21 March 12, 2020, the advisory council consisted of 16 positions, of which Defendants held four.
22 Attendant to their positions on the council, Defendants were entrusted with management of the
23 Chapter’s social media presence along with the other councilors.

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

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

1 this Court's district. Johnson is a former associate of TST who misappropriated TST's
2 Washington Chapter Facebook website from within this Court's district and is using it and its
3 audience in an effort to undermine TST and to create a competitor organization.

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

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

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

21 **IV. FACTUAL BACKGROUND**

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

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

1 25. 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 26. At the relevant time, Facebook was the Washington Chapter’s primary platform of
5 communicating with its membership.

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

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

10 29. 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 30. Over the next several years, the Washington Chapter has grown the Facebook page
15 to an audience exceeding 17,000 followers. *Ibid.*

16 31. In January of 2015, the Washington Chapter created a Twitter account for the
17 organization. See *id.* available at https://twitter.com/TST_Washington. Currently, the Twitter
18 account has an audience of about 4,000 followers. *Id.*

19 32. 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 33. Until the hacking, both Facebook pages were maintained and controlled exclusively
25 by administrators approved by TST.

26 34. Administrators are given a written Code of Conduct, which instruct requirements for

1 permissible activity on behalf of TST. In relevant part, the instructions pertaining to online conduct
2 follow:

3 Public statements & interactions with media

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

8 . . .

9 Confidentiality

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

14 . . .

15 Copyright

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

20 . . .

21 Online code of conduct

22 As a member of TST, your interactions with others, both online and off, will be held to the
23 TST Code of Conduct. As an individual, we support your freedom of speech and freedom
24 to hold your opinions. Members' behavior, however, reflects on the organization as whole
25 and also builds the internal culture of TST. Therefore, we have a code of conduct specifically
26 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 35. The above written instructions form the contours of administrators' authorization to
18 access TST's social media accounts.

19 36. 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 37. 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 38. 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 39. 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 40. 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 41. 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 42. “Organizational failures,” as used above, particularly included:

- 26 (1) Repeatedly operating TST’s social media to endorse leftist politics as opposed

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

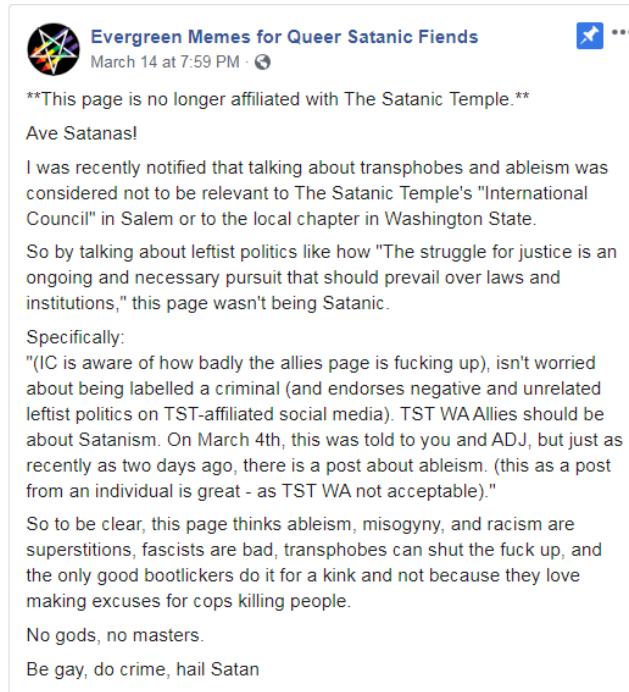
6 43. On March 12, 2020, TST's Washington leadership removed Defendants from their
7 advisory positions.

8 44. Defendants' positions on the advisory council entailed the authorization to manage
9 the Chapter's social media activity. By removing Defendants from their advisory positions, the
10 Washington Chapter leadership revoked Defendants' authorization to manage the Chapter's social
11 media activity and revoked Defendants' authorization to serve as custodians of records.

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

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



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16 47. Meeham, in conjunction with the other named Defendants, then began posting
17 material in violation of the Code of Conduct and in disregard of the revocation of authority entailed
18 in being removed from the position on the advisory council.

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

24 49. Following Meeham’s usurpation of the Allies page, the Washington Chapterhead
25 removed all defendants from administrative access privileges to the remaining social media
26 accounts. More specifically, the Chapterhead removed all administrative privileges of Johnson,

1 Fishbaugh, Meeham, and Sullivan to the Facebook Chapter account and the Twitter and Google
2 accounts referenced herein.

3 50. On or around March 18, 2020, Johnson hacked the TST's Twitter account, removed
4 all of TST's approved administrators, replaced the approved administrators with his co-Defendants,
5 followed a number of extremist groups, and changed the description from "Washington State
6 Chapter of the Satanic Temple" to "Satan stands as the ultimate icon for selfless revolt. We oppose
7 irrational, unjust hierarchies like white supremacy, patriarchy, ableism, & cishet normality."
8 Johnson took these actions despite having a subjective awareness that he no longer had authorization
9 to use TST's Twitter account.

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

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

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

24 54. Johnson ignored the email and did not return the Facebook page to TST.

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

1 See **Exhibit 8** (posts and commentary in excess of authorization). The links and commentary all
2 exceeded Johnson’s grant of authority as defined in the Code of Conduct, disregarded the revocation
3 of authority entailed in being removed from the position on the advisory council, disregarded the
4 explicit revocation of authority entailed in having his administrative access to the Chapter page
5 removed, and disregarded the explicit cease and desist demand referenced in ¶ 53

6 56. On March 20 at 11:36 pm, Fishbaugh attempted to change the password to the
7 Chapter’s Google-based email account by changing the recovery email and changing the phone
8 number. This ignored the revocation of authority entailed in being removed from the position on
9 the advisory council and disregarded the explicit withdrawal of authority entailed in removing her
10 administrative access.

11 57. On March 22 at 3:08 pm, Johnson modified the name of the Chapter page from “The
12 Satanic Temple Washington” to “Satanic Washington State – Archived Temple Chapter” and
13 modified the profile picture to replace TST-specific iconography with “antifa” symbolism. These
14 modifications disregarded the revocation of authority entailed in being removed from the position
15 on the advisory council, disregarded the explicit revocation of authorization entailed in having his
16 social media administrative access revoked, and disregarded the explicit cease and desist demands
17 referenced in ¶ 53.

18 58. By operation of his removal as a member of the advisory council, Sullivan’s control
19 over original signed copies of membership agreements, cloud-based trade secret documentation,
20 became unauthorized.

21 59. Of importance to this action, Sullivan had, and continues to have, exclusive control
22 over membership enrollment and application documents and background check documents for
23 prospective new members (to exclude felons from membership), both of which are paper
24 documents. Sullivan also had, and continues to have, an electronic database of the membership, as
25 well as their contact information.

26 60. TST opposes the use or threat of violence as a mechanism for control.

1 61. The Chapter page maintains its original URL:
2 <https://www.facebook.com/TheSatanicTempleWashington/>.

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

6 63. Facebook refused to correct the matter, mislabeling the issue as a “Page admin
7 issue” to the exclusion of “infringements of your legal rights.”

8 64. One week prior to the original complaint, this time through counsel, TST
9 reiterated the legal theories at play to Facebook and to Johnson. More particularly, On March 23,
10 2020, Matthew Kezhaya (TST’s outside general counsel) issued a demand letter to Johnson which
11 threatened this very litigation unless he “permanently relinquish[ed] full control” of the Chapter
12 page “by 4:00 PM Central Time on March 24, 2020.” **Exhibit 9**

13 65. Johnson ignored the letter and, together with his co-Defendants, continued to
14 maintain exclusive control over the Chapter page. In so doing, Johnson and his co-Defendants
15 disregarded the revocation of authority entailed in being removed from their positions on the
16 advisory council, disregarded the explicit revocation of authorization entailed in having their social
17 media administrative access revoked, and disregarded the explicit cease and desist demands
18 referenced in ¶¶ 53 and 64.

19 66. Facebook did not respond and did not return control of the Chapter page until after
20 the original complaint. See Exhibit 2.

21 67. Defendants simply ignored all communications, from counsel and TST alike.

22 68. TST was able to recover the Twitter account and the email account through
23 Twitter and Google, respectively.

24 **III. CAUSES OF ACTION**

25 **Count 1:**

26 **CFAA violation**

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

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

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

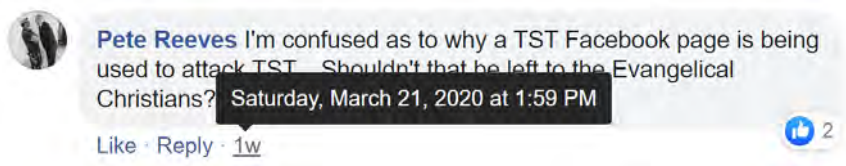
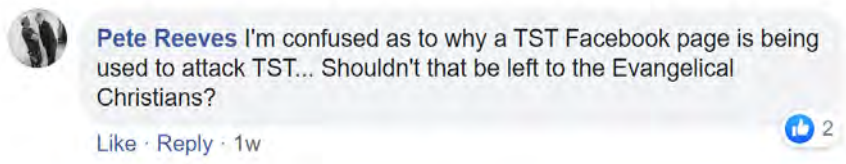
8 72. A “protected computer” is a “computer” which is “used in or affecting interstate or
9 foreign commerce or communication.” 18 U.S.C. § 1030(e)(2)(B).

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

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

15 75. A “loss” is “any reasonable cost to any victim, including the cost of responding to
16 an offense, conducting a damage assessment, and restoring the data, program, system, or
17 information to its condition prior to the offense, and any revenue lost, cost incurred, or other
18 consequential damages incurred because of interruption of service.” 18 U.S.C. § 1030(e)(11).

19 76. As described above, Defendants wrongfully and intentionally by exceeding their
20



1 authorized access, perpetrated fraud upon TST and its membership, as well as any who happened
2 upon the offending posts, by posting under the misappropriated identity of TST. Perfectly
3 encapsulating the issue, one commenter expressed confusion on March 21, stating:

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

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

9 78. Defendants were aware that the social media accounts had an economic value to
10 TST. The social media accounts were the primary means for TST to communicate with the general
11 public and TST’s supporters, and that those communications help to foster the kind of relationship
12 which results in charitable donations to support TST’s organizational purposes. By depriving TST
13 of its social media accounts, Defendants intended to diminish those donations and divert donations
14 to their competitor organization, provisionally named “The Satanic Temple 2: Electric Boogaloo.”
15 Exhibit 5 at p. 4.

16 79. Further compounding the losses are TST’s attorney’s fees for investigating this
17 matter, entering futile demands for corrective action: both of Facebook and from Defendants, and
18 drafting this complaint. TST will continue to incur losses in the costs and fees related to this lawsuit.
19 TST’s costs and attorney’s fees well exceed the \$6,000 incurred in researching and drafting the
20 original complaint.

21 80. TST has incurred, and continues to incur, reputation losses from the
22 misappropriation of its Facebook pages. These reputation losses are quantifiable in monetary terms,
23 but are irreparable by money damages alone.

24 81. Based on the foregoing, TST is entitled to injunctive relief in the form of a permanent
25 injunction enjoining Defendants from accessing any of TST’s “protected computers” (i.e. any
26 internet-based media) under threat of contempt, economic damages of at least \$48,973.92, and costs

1 and attorney's fees to be computed after entry of the decree.

2 **Count 2:**

3 **Tortious interference**

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

5 83. TST maintains ongoing business relationships with Facebook, importantly to
6 include the Chapter page and Allies page.

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

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

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

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

25 88. Defendants' interference with TST's social media presence was wrongful beyond
26 the interference itself. Defendants abused TST's social media presence as a channel to publish

1 derogatory messages directly to TST's intended audience and to falsely suggest that the Washington
2 Chapter was replaced by Defendants' competitor organization. The contemplated and intentional
3 purpose of so doing was to diminish TST's membership and donation base.

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

7 90. Based on the foregoing, TST is entitled to injunctive relief in the form of a permanent
8 injunction enjoining Defendants from accessing any of TST's "protected computers" under threat
9 of contempt, and costs and attorney's fees to be computed after entry of the decree.

10 **Count 3:**

11 **Trespass to chattels**

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

13 92. Trespass to chattels is the intentional interference with a party's personal property
14 without justification that deprives the owner of possession or use. G&G Closed Cir. Events, LLC
15 v. Single, LLC, No. C18-1295JLR, 2020 WL 5815050, at *4 (W.D. Wash. Sept. 30, 2020) (citing
16 Restatement (Second) of Torts § 217).

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

19 94. Defendants intentionally dispossessed TST of the Chapter page and the Allies page
20 by logging in to Facebook's computer network and replacing Defendants for TST's authorized
21 administrators of the pages.

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

26 96. Although Washington has not squarely addressed the question, California courts

1 have resolved that dispossession of access to a computer system is an actionable trespass to chattels.
2 See Synopsys, Inc. v. Ubiquiti Networks, Inc., 313 F. Supp. 3d 1056, 1080 (N.D. Cal. 2018) and
3 Intel Corp. v. Hamidi, 30 Cal. 4th 1342, 1351, 71 P.3d 296, 303 (2003); see also JLM Couture, Inc.
4 v. Gutman, No. 20 CV 10575-LTS-SLC, 2021 WL 827749 (S.D.N.Y. Mar. 4, 2021) (granting a
5 preliminary injunction to restrain a former employee’s use of an employer’s social media accounts
6 post-termination—albeit while explicitly declining to address the ultimate trespass to chattel and
7 conversion claims, id. at *19).

8 97. The second chattel at issue is TST’s membership-related documents, whether in
9 physical or electronic format.

10 98. Defendants, particularly Sullivan, intentionally dispossessed TST of these
11 membership-related documents by maintaining exclusive control over the documents despite the
12 termination of Sullivan’s role as custodian of records.

13 99. Based on the foregoing, TST is entitled to injunctive relief in the form of a permanent
14 injunction enjoining Defendants from accessing any of TST’s “protected computers” under threat
15 of contempt, an order to return TST’s membership related documents and destroy any copies
16 thereof, and costs and attorney’s fees to be computed after entry of the decree.

17 **Count 4:**

18 **Conversion**

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

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

24 102. “Willful” means “intentional” but not necessarily “malicious.” Id. (citing Schilling
25 v. Radio Holdings, Inc., 136 Wn.2d 152, 159–60 (Wash. 1998)) (citations omitted).

26 103. Malicious intent is not an element of conversion and good faith is not a defense. Id.

1 (citing Brown v. Brown, 157 Wn. App. 803, 818, (2010)).

2 104. Trespass to chattels differs from conversion as a matter of degree. See Intel Corp.
3 v. Hamidi, 30 Cal. 4th 1342, 1350, 71 P.3d 296, 302 (2003) (“Dubbed by Prosser the ‘little brother
4 of conversion,’ the tort of trespass to chattels allows recovery for interferences with possession of
5 personal property ‘not sufficiently important to be classed as conversion, and so to compel the
6 defendant to pay the full value of the thing with which he has interfered’); see also Damiano v. Lind,
7 163 Wash. App. 1017 at *5 (2011) (“Trespass to chattels is something less than a conversion.”)
8 (unpublished opinion, but the Court “may consider unpublished state decisions, even though such
9 opinions have no precedential value.” Emps. Ins. of Wausau v. Granite State Ins. Co., 330 F.3d
10 1214, 1220 (9th Cir. 2003)).

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

14 **Count 5:**

15 **Dilution under 15 USC § 1125(c)**

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

17 107. 15 USC § 1125(c) provides for trademark remedies when one or more defendants
18 uses a famous or distinctive mark or trade name in commerce which is likely to cause dilution by
19 blurring or dilution by tarnishment of the famous mark. See 15 USC § 1125(c)(1) and (5).

20 108. A mark is “famous” if it is widely recognized by the general consuming public. 15
21 USC § 1125(c)(2)(A).

22 109. “The Satanic Temple” is a famous mark because it is commonly referenced in the
23 general media. For recent references, see e.g. Penny Lane, *Magnolia Films*, “Hail Satan?” (2019);
24 Cameron Sheppard, *WNPA News Service*, “Amid Pious Protesters, Satanists Conduct a Ritual on
25 the Capitol Steps” (March 6, 2020) (reposted by *The Chronicle*, available at
26 <https://www.chronline.com/stories/amid-pious-protesters-satanists-conduct-a-ritual-on-the-capitol->

1 [steps,4905](#)) (last visited April 23, 2021); David S. Cohen, Rolling Stone, “How the Satanic Temple
2 Could Bring Abortion Rights to the Supreme Court” (August 24, 2020) (available at
3 [https://www.rollingstone.com/culture/culture-features/satanic-temple-abortion-rights-supreme-
5 court-1048833/](https://www.rollingstone.com/culture/culture-features/satanic-temple-abortion-rights-supreme-
4 court-1048833/)) (last visited April 23, 2021); Erik Larson, *Bloomberg News*, “Satanic Temple’s
6 lawyers try Christian-right tactics” (March 22, 2021) (reposted by the Seattle Times, available at
7 <https://www.seattletimes.com/nation-world/satanic-temples-lawyers-try-christian-right-tactics/>)
(last visited April 23, 2021).

8 110. Dilution by blurring is an association arising from the similarity between a mark or
9 trade name and a famous mark which impairs the distinctiveness of the famous mark. 15 USC §
10 1125(c)(2)(B).

11 111. Defendants’ competitor organization, which was provisionally entitled “The Satanic
12 Temple 2: Electric Boogaloo” and “Satanic Washington – Archived Temple Chapter” had a
13 likelihood of impairing the distinctiveness of TST as a famous mark. To-wit:

- 14 (1) “The Satanic Temple 2: Electric Boogaloo” directly copies “The Satanic
15 Temple;” and “Satanic Washington – **Archived Temple Chapter**” (emphasis
16 added) directly suggests that the Washington Chapter has been replaced by
17 Defendants’ competitor organization.
- 18 (2) TST has an inherently distinctive mark because there is only one “The Satanic
19 Temple,” Plaintiff, which has acquired distinctiveness as a mark through years
20 of effort.
- 21 (3) There is only one “The Satanic Temple” because TST jealously guards its
22 intellectual property rights.
- 23 (4) As addressed in ¶ 109, above, there is wide public recognition of The Satanic
24 Temple.
- 25 (5) Defendants intended to create an association between their competitor
26 organization with TST by stealing TST’s Facebook pages, falsely suggesting

1 that TST’s Washington Chapter was no more (“Archived”), and redirecting all
2 internet traffic away from TST’s Washington Chapter and toward Defendants’
3 competitor organization.

4 (6) There is an actual association between Defendants’ mark and TST because
5 Defendants were former TST associates, who intended to create a competitor
6 organization by using TST’s own intellectual property (both the name and the
7 Facebook pages), and advertising their competitor organization through the
8 Facebook pages.

9 Compare 15 USC § 1125(c)(2)(B)(i)-(vi).

10 112. Alternatively, dilution by tarnishment is an association arising from the similarity
11 between a mark and a famous mark that harms the reputation of the famous mark. 15 USC §
12 1125(c)(2)(C).

13 113. TST’s membership base tends to be repelled by organizations which promote
14 ableism, misogyny, racism, fascism, transphobia, and the endorsement of police brutality.

15 114. Defendants’ competitor organization broadcasted statements, directly to current and
16 potential members of TST through TST’s Facebook pages, that TST promotes ableism, misogyny,
17 racism, fascism, transphobia, and the endorsement of police brutality. Defendants broadcasted these
18 statements for the purpose of diverting away from TST both current members and interested
19 potential members of the public.

20 115. Defendants’ competitor organization also publicly affiliated itself (and TST, to an
21 uninformed public) with politically extremist organizations by having the Twitter page follow
22 various politically extremist organizations (§ 50, above) and by modifying the Chapter page’s profile
23 picture to suggest that TST is associated with Antifa (§ 57 above).

24 116. These actions harmed TST—which is a religious organization—by suggesting that
25 TST is not a religious organization, but is instead an extremist political organization. This
26 jeopardizes TST’s tax exempt status as a “church;” jeopardizes the tax exempt status of donations

1 to TST; jeopardizes the civil rights of TST's membership base ("religion" is a protected class under
2 Title VII, but "politics" is not); and diverts TST's membership base, which is interested in joining a
3 religion and not an extremist political group.

4 117. Defendants' competitor group is also selling merchandise which features
5 Defendants' derivative marks and which Defendants are advertising on TST's Allies page. See
6 generally <https://www.redbubble.com/people/QueerSatanic/shop> (last visited April 26, 2012).

7 118. Based upon the foregoing, TST is entitled to recover monetary damages up to three
8 times the sum of: (1) Defendants' profits; (2) TST's reputational damages; and (3) the costs of this
9 action (15 USC § 1125(c)(5), referencing 15 USC § 1117(a) and (b)); an order to destroy all means
10 of making Defendants' counterfeit materials (id., referencing 15 USC § 1118); and orders to seize
11 any goods bearing Defendants' counterfeit marks, any records related to the sale thereof, and other
12 such appropriate orders to prevent the violation of TST's rights as a registered mark holder. (id.,
13 referencing 15 USC § 1116).

14 **IV. PRAYER FOR RELIEF**

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

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

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

25 (3) Defendants shall, jointly and severally, pay economic to Plaintiff in the amount of
26 \$42,973.92 (the sum value of the social media accounts), or such other sum of the numbers identified

1 in ¶ 118, above.

2 (4) Defendants shall, jointly and severally, pay statutory damages to Plaintiff in the
3 amount of \$100,000, or such other amount to be determined at trial.

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

6 (6) Defendants shall, jointly and severally, pay prejudgment and postjudgment interest
7 until paid in full.

8

9 Respectfully submitted this 24th day of May, 2021.

10

LYBECK PEDREIRA & JUSTUS, PLLC

11

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And: /s/ Matthew A. Kezhaya
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479.431.6112 /ph 479.282.2892 /fax
matt@kezhaya.law / email Kezhaya

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of May, 2021, I electronically filed the SECOND AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

Dated at Seattle, Washington, the 24th day of May, 2021.

By: /s/ Benjamin Justus
Benjamin Justus



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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

TESS HOME	NEW USER	STRUCTURED	FREE FORM	BROWSE DICT	SEARCH OG	TOP	HELP	PREV LIST	CURR LIST	NEXT LIST
FIRST DOC	PREV DOC	NEXT DOC	LAST DOC							

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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


Allies Facebook Page Transparency as of April 26, 2021

Page Transparency ✕






Evergreen Memes for Queer Satanic Fiends
Religious Organization


Organizations That Manage This Page i

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

Page History i

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

Ads From This Page

 Find support or report Page

[Close](#)



The Satanic Temple of Washington

Membership Agreement and Code of Conduct

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

I. INTRODUCTION

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

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

II. MEMBERS

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

III. THE SEVEN TENETS

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

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

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

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

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

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

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

IV. VALUES

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

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

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

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

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

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

V. ADDITIONAL GUIDELINES FOR BEHAVIOR

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

Public statements & interactions with media:

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

Public actions: Protestors and law enforcement:

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

Confidentiality:

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

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

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

Health & Safety:

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

Public Harassment:

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

General Decorum:

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

VI. ONLINE CODE OF CONDUCT

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

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

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

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

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

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

VII. FILING A COMPLAINT

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

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

b. Formal Process

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

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

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

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

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

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

Member Signature

Date

Print member name

New Member Team Signature

Date

Search



Syner-gy

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2 16



Nathan Von Sullivan

March 15 ·

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

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

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

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

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

Friend Requests

See All



Lillith Allstar

30 mutual friends

Confirm

Delete

Suggested Pages

See All



Satanic Temple of Myrtle Beach

David and 24 other friends like this.

Like



The Satanic Temple - Arizona Chapter - North

Ashema and 21 other friends like this.

Like

English (US) · Español ·

Português (Brasil) · Français (France) ·

Deutsch

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Synner-gy

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Create

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16



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

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

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

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

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

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

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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



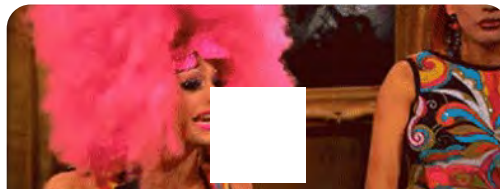
Nathan Von Sullivan ThAt Is An InSuLt

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A David Johnson Nathan Von Sullivan



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whole TST mess too.

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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 Bleeblespot Rosenberg Welp

Time to found your own

Like · Reply · 8w

4



Nathan Von Sullivan three steps ahead of you

Like · Reply · 8w

2



Martin Bleeblespot 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



Synner-gy

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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



Synner-gy

Home

Create

2

16



Like · Reply · 8w

1



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

Like · Reply · 8w

7



Verona Cruz replied · 3 Replies



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

Like · Reply · 8w

4



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

Like · Reply · 8w

3



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

Like · Reply · 8w

1



Lori Erickson replied · 2 Replies



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

Like · Reply · 7w · Edited

4



Nathan Von Sullivan replied · 1 Reply



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

Like · Reply · 7w

1



Write a comment...

Satanic Washington State - Archived Temple Chapter

March 21 at 12:34 AM ·

Well, I think I gave them long enough.

- - -

Hail Satan! This is ADJ.

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

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

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

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

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

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

That's not a coincidence.

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

The messaging isn't the only thing.

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

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

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

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

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

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

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

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

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

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

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

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



Evergreen Memes for Queer Satanic Fiends

March 14 at 9:59 PM ·

****This page is no longer affiliated with The Satanic Temple.****

Ave Satanas!

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

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

Specifically:

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

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

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

No gods, no masters.

Be gay, do crime, hail Satan

52

92 Comments 6 Shares

3/31/2020

Case 2:20-cv-00500-Rvd Document 2-1 Filed 03/31/20 Page 1 of 1



Tarkus Claypool <tarkus.claypool@gmail.com>

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

Tarkus Claypool <tarkus.claypool@gmail.com>

Fri, Mar 20, 2020 at 11:29 PM

To: David Johnson <somedavidjohnson@gmail.com>

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

Hi ADJ,

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

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

CONFIDENTIALITY NOTICE

The content of this email is confidential and intended only for those parties who received the email directly from the tarkus.claypool@gmail.com address. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender.

[Quoted text hidden]

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

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.

10

Satanic Washington State - Archived Temple Chapter

March 21 at 12:40 AM ·

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



MEDIUM.COM

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

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

21

2 Comments 6 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:46 AM ·

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

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



31

74 Comments 5 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:50 AM ·

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

\$130 for a robe. Wild.

^ADJ

--

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

WEB.ARCHIVE.ORG

The Satanic Temple's Position on Contemporary Issues

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

10

1 Comment 2 Shares

Satanic Washington State - Archived Temple Chapter

March 21 at 12:55 AM ·

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

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

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

^ADJ



Lucien Greaves

March 14, 2016 ·

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

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

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

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

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

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

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

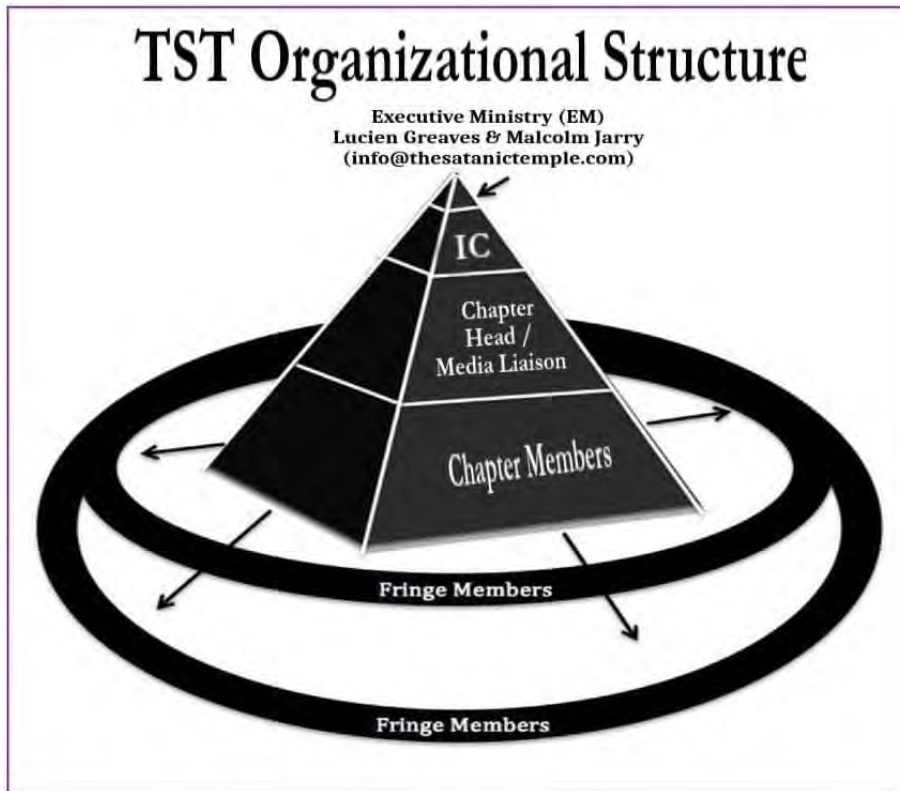
15

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 #DeusVolt #SatanicCrusade to #FreePalestine

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

Satanic Washington State - Archived Temple Chapter

March 21 at 1:55 AM ·

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

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

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

^ADJ

- - -

From the official media training guide:

[Don't answer] Yes or no questions.

Question:

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

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

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

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

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

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

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

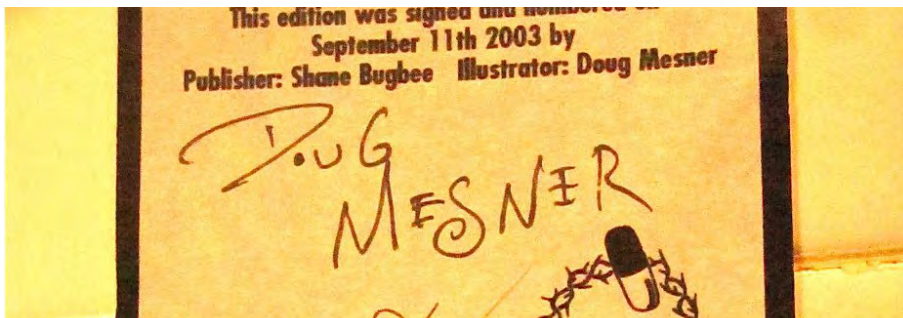
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their terms. Instead, say something like: "I can't speak to something that ha
is incredibly inclusive and we welcome members from all walks of life."





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 Satanus, 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/heresyquad/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!



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MATT@KEZHAYA.LAW

March 23, 2020

Mr. David Alan Johnson

By email only to somedavidjohnson@gmail.com

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

Mr. Johnson,

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

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

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

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'MK', is written over the name Matthew A. Kezhaya.

Matthew A. Kezhaya

EXHIBIT 7

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED FEDERATION OF CHURCHES,
LLC,

Plaintiff,

v.

DAVID ALAN JOHNSON, *et al.*,

Defendants.

Case No. 20-cv-00509-RAJ

**ORDER GRANTING
DEFENDANT'S MOTION TO
DISMISS AND DENYING
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

I. INTRODUCTION

This matter comes before the Court on Defendants' Motion to Dismiss and Plaintiff's Motion for Preliminary Injunction. Dkt. ## 33, 42. For the reasons below, the Court **GRANTS** Defendants' Motion to Dismiss and **DENIES** Plaintiff's Motion for Preliminary Junction.

II. BACKGROUND

This case involves a dispute between Plaintiff United Federation of Churches and its former members, Defendants. Plaintiff alleges that Defendants hacked several social media accounts and began posting content critical of Plaintiff's organization. Two of the social media accounts at issue are located on Facebook—

the “Chapter” page and the “Allies” page. Dkt. # 26 at 6. Plaintiff brought federal law claims under the Computer Fraud and Abuse Act (“CFAA”), 18 U.S.C. § 1030 and the Anti-Cybersquatting Consumer Protection Act (“ACPA”), and also brought associated state law claims.

Following two rounds of motions to dismiss, this Court dismissed Plaintiff’s federal law claims and state law claims relating to the Chapter page on Facebook. Dkt. # 31 at 32. Plaintiff did not amend its complaint. Defendants now ask the Court to dismiss for lack of subject-matter jurisdiction. Dkt. # 33.

III. LEGAL STANDARD

A. FRCP 12(b)(1)

Federal courts are tribunals of limited jurisdiction and may only hear cases authorized by the Constitution or a statutory grant. *Kokkonen v. Guardian Life Ins. Co. of America*, 511 U.S. 375, 377 (1994). The burden of establishing subject-matter jurisdiction rests upon the party seeking to invoke federal jurisdiction. *Id.* Once it is determined that a federal court lacks subject-matter jurisdiction, the court has no choice but to dismiss the suit. *Arbaugh v. Y & H Corp.*, 546 U.S. 500, 514 (2006); Fed. R. Civ. P. 12(h)(3) (“If the court determines at any time that it lacks subject-matter jurisdiction, the court must dismiss the action.”).

IV. DISCUSSION

With the Court’s dismissal of Plaintiff’s federal claims, Defendants now argue that there is no federal question jurisdiction and the requirements for diversity jurisdiction have not been met. District courts have diversity jurisdiction over all civil actions between citizens of different states where the amount in controversy exceeds \$75,000, exclusive of interest and costs. 28 U.S.C. § 1332(a). Defendants argue that Plaintiff cannot establish either prong.

A. Complete diversity.

Plaintiff has established the “complete diversity” requirement. To establish

complete diversity, the citizenship of each plaintiff must be diverse from the citizenship of each defendant. LLCs, such as Plaintiff, are citizens “of every state of which its owners/members are citizens.” *Johnson v. Columbia Props. Anchorage, LP*, 437 F.3d 894, 899 (9th Cir. 2006). Defendants take issue with the fact that Plaintiff’s Corporate Disclosure Statement failed to list the states of which its owners/members are citizens. Dkt. # 33 at 5. In response to Defendant’s motion, Plaintiff filed a revised Corporate Disclosure Statement addressing this issue. Dkt. # 34. This late filing is a minor procedural mistake which does not affect this Court’s subject matter jurisdiction. Neither the Court nor the parties were prejudiced by this late filing. The revised Corporate Disclosure Statement clears any ambiguity regarding complete diversity of the parties. Plaintiffs are citizens of Massachusetts, and Defendants are citizens of Washington.

B. Amount in controversy.

Defendants facially attack Plaintiff’s complaint, arguing that the complaint fails to plead facts establishing the amount in controversy. *See Wolfe v. Strankman*, 392 F.3d 358, 362 (9th Cir. 2004) (“In a facial attack, the challenger asserts that the allegations contained in a complaint are insufficient on their face to invoke federal jurisdiction.”).

The amount-in-controversy requirement is generally determined by the amount claimed in the complaint, and this amount controls if the complaint was made in good faith. *See St. Paul Mercury Indem. Co. v. Red Cab Co.*, 303 U.S. 283, 288–89 (1938). Nonetheless, a district court may be justified in dismissing the action where it appears to a legal certainty that the actual claim is less than the jurisdictional amount. *Lowdermilk v. United States Bank Nat’l Assoc.*, 479 F.3d 994, 999 (9th Cir. 2007). Here, the surviving claims seek injunctive relief and common law damages relating to misappropriation of the “Allies” page on Facebook that promotes Plaintiff’s organization to non-members. Dkt. # 26 at 16. The complaint specifically estimates the “loss” related to the misappropriation of the Allies page to be \$1,037.52. Dkt. # 26 at 16. This is far below the required \$75,000 to establish the amount in controversy. That Plaintiff also seeks


injunctive relief does not change this conclusion. *See Cohn v. Petsmart, Inc.*, 281 F.3d 837, 840 (9th Cir. 2002) (stating that “the amount in controversy is measured by the value of the object of the litigation” where the plaintiff seeks injunctive relief).

Nor do any other peripheral allegations nudge the complaint’s stated amount-in-controversy into the realm of plausibility. Although the complaint seeks \$100,000 in statutory damages, Plaintiff’s statutory claims have already been dismissed. *See* Dkt. # 31 at 32. Same with Plaintiff’s common law claims alleging damages for misappropriation of the “Chapter” page on Facebook. *Id.* Finally, Plaintiff’s allegations regarding its losses for tortious interference with business relations are sparse. But in any event, the cumulative value of Plaintiff’s lost business with Facebook does not exceed the jurisdictional minimum. *See* Dkt. # 26 at 16. Nor has Plaintiff established that punitive damages would be permitted under the applicable state law based on the conduct alleged. *See Davenport v. Mut. Ben. Health & Accident Ass’n*, 325 F.2d 785, 787 (9th Cir. 1963). For these reasons, the Court agrees with Defendants that the complaint fails to plead facts establishing the amount in controversy and **GRANTS** the Motion to Dismiss.

V. CONCLUSION

For the reasons stated above, the Court **GRANTS** Defendants’ Motion to Dismiss. Dkt. # 33. Because the court lacks subject matter jurisdiction, Plaintiff’s request for a preliminary injunction is rendered moot. The Court **DENIES** the motion on that basis. Dkt. # 42.

DATED this 6th day of January, 2023.

A handwritten signature in black ink, reading "Richard A. Jones", written over a horizontal line.

The Honorable Richard A. Jones
United States District Judge

EXHIBIT 8

NOT FOR PUBLICATION

FILED

UNITED STATES COURT OF APPEALS

NOV 30 2023

FOR THE NINTH CIRCUIT

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

UNITED FEDERATION OF CHURCHES
LLC, DBA The Satanic Temple,

Plaintiff-Appellant,

v.

DAVID ALAN JOHNSON, AKA ADJ; et
al.,

Defendants-Appellees.

No. 23-35060

D.C. No. 2:20-cv-00509-RAJ

MEMORANDUM*

Appeal from the United States District Court
for the Western District of Washington
Richard A. Jones, District Judge, Presiding

Argued and Submitted November 15, 2023
UW Law School SE

Before: McKEOWN and GOULD, Circuit Judges, and BENNETT,** District
Judge.

Plaintiff-Appellant United Federation of Churches LLC (dba “The Satanic
Temple”) (“TST”) is a self-purported non-theistic religious organization.

* This disposition is not appropriate for publication and is not precedent
except as provided by Ninth Circuit Rule 36-3.

** The Honorable Richard D. Bennett, United States District Judge for
the District of Maryland, sitting by designation.

Defendants-Appellees David Johnson, Leah Fishbaugh, Mickey Meehan, and Nathan Sullivan are former members of the advisory council for The Satanic Temple's Washington Chapter. After their removal from the council, the Defendants-Appellees allegedly made false public statements on the Chapter's social media pages about The Satanic Temple, including allegedly falsely ascribing extremist ideologies and affiliations to The Satanic Temple. The Satanic Temple filed suit, alleging claims for, as relevant here, defamation and cyberpiracy under the Anti-Cybersquatting Consumer Protection Act ("ACPA"), 15 U.S.C. § 1125(d). The District Court dismissed both claims for failure to state a claim upon which relief could be granted, and it denied The Satanic Temple's motion for reconsideration.

The Satanic Temple timely appeals the dismissal and denial of reconsideration for its claims. We have jurisdiction under 28 U.S.C. § 1291 and review de novo a district court's dismissal for failure to state a claim upon which relief may be granted. *Puri v. Khalsa*, 844 F.3d 1152, 1157 (9th Cir. 2017). We affirm the dismissal of the ACPA claim and vacate and remand the dismissal of the defamation claim.

1. The ACPA establishes liability for cyberpiracy where the defendant, acting in bad faith, used a domain name that is identical or confusingly similar to a protected mark owned by the plaintiff. 15 U.S.C. § 1125(d)(1)(A). A domain name is "any alphanumeric designation which is registered with or assigned by any domain

name registrar, domain name registry, or other domain name registration authority as part of an electronic address on the Internet.” *Id.* § 1127. In this case, however, the alleged infringement regards a post-domain path, not a domain name within the meaning of Section 1127. *See Interactive Prod. Corp. v. a2z Mobile Off. Sols., Inc.*, 326 F.3d 687, 691 (6th Cir. 2003). Moreover, contrary to The Satanic Temple’s novel argument, domain registration is not the same as registration for a social media website. Lastly, even if The Satanic Temple’s Facebook page constitutes a domain name under the Act, liability only attaches if the defendant “is the domain name registrant or that registrant’s authorized licensee.” 15 U.S.C. § 1125(d)(1)(D). The defendants in this case were not the domain name registrants as required under the Act.

2. The District Court dismissed the defamation claim under the ecclesiastical abstention doctrine, but it is unclear based on the Complaint whether that doctrine applies. *See Huntsman v. Corp. of the President of the Church of Jesus Christ of Latter-Day Saints*, 76 F.4th 962, 968 (9th Cir. 2023). The defamation claim merely states that “[b]y falsely ascribing extremist ideologies and affiliations to TST, Defendants published and republished false and defamatory statements about TST and TST’s employees.” Because this claim potentially invokes “religious controversies that incidentally affect civil rights,” *Puri*, 844 F.3d at 1162, TST must specify which statements are alleged to be false and defamatory. We assume there

will be an amended complaint to this effect. Only then may the District Court determine whether there are religious issues that warrant invoking the ecclesiastical abstention doctrine.

3. Although the District Court found that The Satanic Temple is a citizen of Massachusetts and Defendants-Appellees are citizens of Washington, the record is insufficiently developed regarding whether the value of the injunctive relief and punitive damages sought in the defamation claim satisfies the amount in controversy requirement for diversity jurisdiction under 28 U.S.C. § 1332. This inquiry into the jurisdictional amount must be conducted before the defamation claim may be dismissed for lack of subject matter jurisdiction.

AFFIRMED IN PART; VACATED AND REMANDED IN PART.

EXHIBIT 9

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED FEDERATION OF
CHURCHES, LLC,

Plaintiff,

v.

DAVID ALAN JOHNSON, et al.,

Defendants.

Case No. 2:20-cv-00509-RAJ

MINUTE ORDER

The clerk issues the following minute order by the authority of the Honorable Richard A. Jones, United States District Judge:

The parties are directed to meet and confer and file a joint status report proposing a deadline to complete jurisdictional discovery regarding the value of the injunctive relief and punitive damages sought in the defamation claim and a deadline for the filing of an amended complaint. The joint status report shall be filed no later than January 24, 2024.

DATED this 3rd day of January, 2024.

RAVI SUBRAMANIAN,
Clerk of the Court

/s/ Victoria Ericksen
Deputy Clerk to Hon. Richard A. Jones

EXHIBIT 10

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

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

Plaintiff,

v.

David Alan Johnson (aka "ADJ"), Leah
Fishbaugh, Mickey Meeham, and Nathan
Sullivan,

Defendants.

No. 2:20-cv-00509-RAJ

NOTICE OF
DISMISSAL WITHOUT PREJUDICE

LET IT BE KNOWN THAT the parties met and conferred on January 17, 2024. See Dkt. 57. At the conference, the parties agreed that Plaintiff would elect to nonsuit this action, without an award of costs or attorneys fees to any party. The Court should enter an order of dismissal without prejudice because no Defendant has filed an answer or motion for summary judgment. FRCP 41(a)(1)(A)(i).

[remainder intentionally left blank; signatures and certificate following]

1 Respectfully submitted this 24th day of January, 2024.

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LYBECK PEDREIRA & JUSTUS, PLLC

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And: /s/ Matt Kezhaya
Matthew A. Kezhaya (MN#0402193), admitted pro hac vice
Attorney for Plaintiff
Kezhaya Law PLC
150 S. Fifth St., Suite 1850
Minneapolis, MN 55402
479.431.6112 /ph
matt@kezhaya.law / email Kezhaya

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2024, I electronically filed this JOINT STIPULATION TO DISMISS WITHOUT PREJUDICE with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record. */s/ Matt Kezhaya*

EXHIBIT 11

From: ECF@wawd.uscourts.gov
To: ECF@wawd.uscourts.gov
Subject: Activity in Case 2:20-cv-00509-RAJ United Federation of Churches LLC v. Johnson et al Terminated Case
Date: Thursday, January 25, 2024 8:05:14 AM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

United States District Court for the Western District of Washington

Notice of Electronic Filing

The following transaction was entered on 1/25/2024 at 8:03 AM PST and filed on 1/25/2024

Case Name: United Federation of Churches LLC v. Johnson et al

Case Number: [2:20-cv-00509-RAJ](#)

Filer:

WARNING: CASE CLOSED on 01/25/2024

Document Number: No document attached

Docket Text:

*****Civil Case Terminated. Civil case dismissed without prejudice pursuant to Plaintiff's [58] NOTICE of Voluntary Dismissal and FRCP 41(a)(1)(A)(i). (VE)**

2:20-cv-00509-RAJ Notice has been electronically mailed to:

Jeremy E Roller jroller@aretelaw.com, cprutting@aretelaw.com, jfischer@aretelaw.com, kgreenberg@aretelaw.com

Benjamin R Justus BEN@LPJUSTUS.COM, kasandra@lpjustus.com

Matt Kezhaya matt@kezhaya.law, sonia@kezhaya.law

2:20-cv-00509-RAJ Notice will not be electronically mailed to: