

CAUSE No. D-1-GN-22-006797

THE SATANIC TEMPLE, INC.

Plaintiff,

v.

JESSICA LYNN SNOW

Defendant.

§
§
§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

261ST, DISTRICT COURT

____ JUDICIAL DISTRICT

PLAINTIFFS' ORIGINAL PETITION

1. Defendant, Jessica Lynn Snow, has published several false and defamatory statements regarding The Satanic Temple, Inc.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over this case because Plaintiffs seek declaratory and injunctive relief, as well as damages within the jurisdictional limits of this Court.

3. This Court has personal jurisdiction over Defendant, who may be served by process at [REDACTED], Round Rock, Texas [REDACTED] or wherever she may be found. Her social security number and driver's license are unknown.

4. Venue properly lies with this Court under TEX. CIV. PRAC. & REM. CODE § 15.002, because: (1) all, or a substantial portion of the events or omissions giving rise to the claim occurred in Travis County; and (2) Travis County is the defendant's county of residence.

5. Plaintiffs seek damages within the jurisdictional limits of this Court. Plaintiffs seek

monetary relief of \$250,000 or less and non-monetary relief. TEX. R. CIV. P. 47.

PARTIES

6. **The Satanic Temple, Inc.**, plaintiff, (“TST”) is a famous IRS-recognized atheistic religious corporation with its principal place of business in Salem, Massachusetts. TST’s membership exceeds 560,000 and was recently the subject of the acclaimed film, “Hail Satan?” (2019, Magnolia Films). *See also Satanic Temple v. City of Scottsdale*, No. CV18-00621-PHX-DGC, 2020 WL 587882 (D. Ariz. Feb. 6, 2020) (holding that TST is a bona fide religion). TST’s membership can be found in every state, including Texas. TST venerates (but does not worship) the biblical adversary as a promethean icon against authority. For TST and its membership, the Satan described in *Paradise Lost* and like works is a revolutionary antihero who stood up against impossible odds to seek justice and egalitarianism for himself and others. TST propagates its Seven 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.

<https://thesatanictemple.com/pages/about-us> (last visited January 26, 2022).

7. **Jessica Lynn Snow, a/k/a “The Satanic Housewife”**, the Defendant, operates several social media accounts under the name “The Satanic Housewife.” For example, on Instagram, she is @satanichousewife; on Twitter she is @satanxhousewife; on Facebook she is @roasmind.

DISCOVERY

8. Plaintiff intends to conduct discovery under Level 3.

FACTS ALLEGED

9. Defendant Snow published a video on her Tik Tok account (and promulgated it across several social media platforms) on or about May 3, 2022.¹ In the video, Defendant Snow made several verifiably false claims. This video has been viewed at least 35,000 times and has been commented on and shared extensively.

10. For example, Defendant Snow stated, “In a recent court case . . . Lucien [Greaves, one of the founders and leaders of TST] openly admitted to takin the money fundraised for court cases and for abortion rights advocacy and using it to pay his personal bills instead.” In fact, the purported admission by Lucien Greaves was that he had been compensated for his time and creative efforts in designing a monument. Therefore, this statement was false. It was defamatory because it charges TST with allowing embezzlement

¹ Available at: <https://www.tiktok.com/@thesatanichousewife/video/7093692392297041194> (last visited November 23, 2022) originally published on or about May 3, 2022.

of funds – a serious charge of fraud.

11. Similarly, Defendant Snow stated that TST “is suing former members to make them be quiet about the stuff they experienced while in the Temple.” In fact, TST sued some former members because they stole property from TST and – using that stolen property – channeled provably false and harmful statements to TST’s members to divert funds from those members to a new competitor organization. This is defamatory because it inaccurately paints TST as an abusive organization and tends to diminish the public trust in TST as a religious organization.

12. Further, Defendant Snow stated that “one of [TST’s] chapter leaders being accused of sexual assault and TST kick[ed] the victim out of the chapter.” This statement was patently false and defamatory because it suggests that TST supported a person in a leadership position who was accused of sexual assault by removing the accuser. This statement directly conflicts with TST’s actual conduct, and it harms the reputation of TST with current members, potential members, and with the public at large.

13. Finally, Defendant Snow stated that TST’s “head of ministry is really good friends with alt-right celebrities like Milo Yiannopoulos.” Once again, this statement is demonstrably false. TST’s head of ministry was friends with Yiannopoulos long ago, but has separated from Yiannopoulos for many years. The lack of context in the video is defamatory because people likely to support TST and its mission of supporting Religious Reproductive Rights are also likely adverse to Yiannopoulos and may be deterred from donating to TST.

14. On May 5, 2022, Defendant Snow posted another video to TikTok, which has now been viewed at least 48,000 times. This video further doubled down on her statements, falsely claiming that TST “has no grounds to help you maintain abortion access.” She further

states “in fact they have tried this previously and failed each time, because they don’t have standing.” Again, this is patently false. There are currently two cases pending in the Southern District of Texas and in Travis County. Neither of those cases has been dismissed or resolved on the merits. TST continues litigating both cases to this day.

15. To make matters worse, Defendant Snow continued to make false and defamatory statements about TST despite an effort by TST to educate her on the facts surrounding her false statements. On June 9, 2022, counsel for TST sent Defendant Snow a letter to explain the false statements and request a retraction, correction, or clarification under Texas Law. A true and correct copy of that letter is attached to this petition as Exhibit A. *See* Exhibit A (redacted for contacts that may not be related to Defendant Snow).

16. After receiving this letter, Defendant Snow posted a purported “retraction” video of the May 3, 2022 Tik Tok video.² In the video, posted on or about June 17, 2022, she states that “the Tik Tok post I made contained many statements that are provably untrue, I regret having made the post and the harm it has unfairly and unjustly caused The Satanic Temple, I know of no credible claims that The Satanic Temple has ever misappropriated funds.” She goes on to say that “I know of no credible claims that The Satanic Temple condones sexual assault or punishes victims[.] I know of no credible claims that The Satanic Temple has alt-right ties. I sincerely apologize for my hurtful, misleading, and dishonest statement.” While this appeared to be a retraction of her prior claims, it is belied by a later video.

17. On June 21, 2022, Defendant Snow posted yet another video in which she

² Available at: <https://www.tiktok.com/@thesatanichousewife/video/7110277942231534891> (last accessed on June 22, 2022) originally posted on or about June 17, 2022.

effectively retracted her June 17, 2022 video.³ In the video, she shares the letter attached hereto as Exhibit A. At the beginning of the video, Defendant Snow states, “I don’t blame you for not believing it, or for asking for evidence, because that’s what you should do about everything.” She also states that page 3 of the letter was “telling [her] what to do with the new video.” The implication of her statements is that the video she posted on June 17, 2022 was coerced. In other words, Defendant Snow published several false statements on TikTok, was asked to provide a retraction, clarification, or correction as required under Texas law, and then claimed that the request for retraction, clarification, or correction was a coercive attempt to silence her.

CAUSES OF ACTION

Count 1

Business Disparagement

18. Plaintiff incorporates the above paragraphs as if set forth fully in this section.

19. Defendant Snow published several false statements regarding TST. These statements were disparaging because Defendant Snow intended the words to cast doubt, and the words did cast doubt, on TST’s reputation. The statements referred to TST’s economic interests because the statements were directed at TST’s fundraising efforts and the character of its business conduct. These words were published to several third parties via TikTok, Instagram, Twitter, Facebook, and other platforms.

20. The statements published by Defendant Snow were false.

21. Defendant Snow either: (1) knew the statements were false, (2) acted with reckless disregard for whether the statements were true; (3) acted with ill will; and/or (4)

³ Available at: <https://www.tiktok.com/@thesatanichousewife/video/7111840118234762542>. (Last accessed on June 22, 2022)

intended to interfere with TST's fundraising efforts.

22. Defendant Snow is not a media defendant as described by *New York Times Co. v. Sullivan*, 376 U.S. 254, 279-80 (1964). Regardless of her status, Defendant Snow acted with actual malice in publishing these statements.

23. Plaintiff was harmed by Defendant Snow's statements in an amount to be proven at trial.

Count 2

Defamation – Libel per se under Tex. Civ. Prac. & Rem. Code § 73.001

24. Plaintiff incorporates the above paragraphs as if set forth fully in this section.

25. Defendant Snow's statements "injure a living person's reputation and thereby expose the person to public hatred, contempt or ridicule, or financial injury" and injures or impeaches TST's "honesty, integrity, virtue, or reputation."

26. Further, the statements impute criminal activity (fraud, embezzlement, and support for sexual assault) and impute sexual misconduct.

27. Defendant Snow acted with actual malice in publishing these statements.

PRAYER FOR RELIEF

Plaintiff prays for relief as follows.

- Damages, general and presumed, in an amount to be awarded by the jury at trial;
- Exemplary damages in an amount to be awarded by the jury at trial;
- A temporary injunction requiring removal of the defamatory statements from social media accounts;
- A permanent injunction to refrain from publishing further false statements disparaging TST;
- Attorneys' fees, court costs, and other reasonable expenses incurred in bringing the

action; and,

- Such further relief, at law or equity, to which plaintiffs' show themselves entitled.

Respectfully submitted November 23, 2022,

By: /s/ Brad Ryyananen

The Ryyananen Law Office, PLLC

515 Centre Street # 4471

Dallas, TX 75208

phone: 214-972-8640

email: brad@bdrlegal.com

And: Matthew A. Kezhaya, ABA # 2014161

Crown Law

1202 NE McClain Rd

Bentonville, AR 72712

phone: (479) 431-6112

email: matt@crow.n.law

(pro hac vice to be filed)

Exhibit A

KEZHAYA LAW PLC

MATTHEW A. KEZHAYA
(479) 431-6112
MATT@KEZHAYA.LAW



333 N. WASHINGTON AVE.,
SUITE 300
MINNEAPOLIS, MN 55401

June 9, 2022

Jessica Lynn Snow
a/k/a @satanichousewife on TikTok
[REDACTED]
Round Rock, Texas [REDACTED]

Sent via email to gypgypsnow@gmail.com, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]; Instagram to satanichousewife; Facebook
Messenger to “The Satanic HouseWife” a/k/a @roasmind; Twitter to
“The Satanic Housewife” a/k/a @satanxhousewife; and First Class
Mail.

Re: *The Satanic Temple v. Jessica Lynn Snow*, Demand Letter and Request for
Correction, Clarification, or Retraction

Ms. Snow:

If you have representation in this matter, please forward this letter to your attorney and request that they contact me. I serve as general counsel for The Satanic Temple, Inc. (“TST”). I have been made aware of a recent TikTok video of yours,¹ in which you make certain provably-false statements of fact about my client which have a tendency to harm my client’s reputation. The purpose of my letter is to inform you that these statements you have made are actionable, and that litigation will ensue unless you publish a correction, clarification, or retraction of the defamatory statements on TikTok, and any other platform on which you have shared the video, within three days.

In your video, beginning at about 0:20, you state: “In a recent court case ... Lucien openly admitted to taking the money fundraised for court cases and for abortion rights advocacy and using it to pay his personal bills instead.” Your statement is false. Lucien has never made any statement to the effect of an admission to “taking money fundraised for court cases and for abortion rights

¹available at: <https://www.tiktok.com/@thesatanichousewife/video/7093692392297041194> (last visited June 8, 2022) originally published on or about May 3, 2022.

advocacy and using it to pay his personal bills instead.” Your false statement is defamatory because it charges TST (a public charity) with allowing for embezzlement, which is a serious charge of fraud.

Next, beginning at about 0:41, you claim that TST is “suing former members to make them be quiet about the stuff they experienced while in the Temple.” Your statement is false. TST is suing those former members because they stole TST’s property and, using that stolen property, channeled provably-false and harmful statements directly at TST’s audience, which statements were made for the wrongful purpose of diverting TST’s donation base to the former members’ new competitor organization. Your false statement is defamatory because it wrongly paints TST as being abusive against its former members, which tends to diminish the public trust in TST as a religious organization.

Next, at approximately 0:51, you claim that “one of their chapter leaders being accused of sexual assault and TST kicking the victim out of the chapter.” This statement is patently false. It is defamatory because it suggests that TST supported a person in a leadership position within the organization who was accused of sexual assault by removing the accuser. This is in direct contrast to TST’s actual conduct, and it harms the reputation of TST with its current membership, with potential members, and with the public at large. As you have first-hand knowledge, TST investigated this matter and found (based on eyewitness interviews) that the “victim” falsified the allegation.

Last, at about 0:57, you claim that TST’s “head of ministry is really good friends with alt-right celebrities like Milo Yiannopoulos.” Your statement is false. TST’s head of ministry *was* friends with Yiannopoulos, long ago, but they have not been friends for many years. Without necessary context, the statement is false. Your false statement is defamatory in the overall context of the video because the kinds of people who are likely to donate to TST in support of the Religious Reproductive Rights campaign are politically averse to Yiannopoulos and will therefore be deterred from donating to TST by a misbelief that there are secret ties between TST and him.

Because litigation may become necessary, you are obligated to refrain from destroying or deleting any social media accounts, any media storage devices (*e.g.*, phones or laptops), and any communication you may have had with third parties about TST or the matters in your video. If information relevant to a known potential lawsuit is missing, it may be presumed to be harmful to the person who failed to preserve the information. *See Brookshire Bros., Ltd. v. Aldridge*, 438 S.W.3d 9 (Tex. 2014).

As noted above, we intend to file suit unless you publish a sufficient correction, clarification, or retraction of the defamatory statements on TikTok, and any other platform on which you have shared the video (such as Facebook, Instagram, Twitter, Discord, Reddit, or any other platform), within three days, including a link to the original video so that it is likely to be seen by those who have viewed the original video. TST reserves the right to file suit to the extent that the correction, clarification, or retraction is deemed insufficient under the Texas Defamation Mitigation Act.

Please notify me if you intend to acquiesce to this letter. If I do not hear from you by the deadline, I will assume that you intend to defend your video in court.

Sincerely,

Matthew A. Kezhaya