

The Honorable Richard A. Jones

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

UNITED FEDERATION OF CHURCHES,  
LLC d/b/a THE SATANIC TEMPLE,

Plaintiff,

v.

DAVID ALAN JOHNSON, an individual;  
LEAH FISHBAUGH, an individual;  
MICKEY MEEHAM, an individual; and  
NATHAN SULLIVAN, an individual,

Defendants.

No. 2:20-cv-00509-RAJ

**DECLARATION OF NATHAN  
SULLIVAN IN OPPOSITION TO  
PLAINTIFF’S MOTION FOR  
PRELIMINARY INJUNCTION**

NOTED ON MOTION CALENDAR:  
December 16, 2022

I, Nathan Sullivan, declare as follows:

1. I am a former member of The Satanic Temple (“TST”). In 2014, I was a co-founder of TST’s Washington Chapter (“TST-WA”). During my membership, I served in a volunteer capacity in an advisory role in a group referred to as the Strategy Council.

2. As part of my volunteer work with TST-WA and the Strategy Council, I was aware that TST required TST-WA to appoint a person in the role of Media Liaison. The chapters were mandated to create the Media Liaison role at the explicit, written behest of TST’s National Council. The Media Liaison was responsible for representing TST to the

1 media at the local level. It was always my understanding that the Media Liaison had the  
2 authority to represent and speak for TST’s interests.

3 3. On or around August 5, 2016, Paul Case was appointed to the position of  
4 Media Liaison for TST-WA. In his work with TST, Paul Case uses the pseudonym Tarkus  
5 Claypool.

6 4. Paul Case/Tarkus Claypool remained TST-WA’s Media Liaison throughout  
7 the time of the events alleged in TST’s lawsuit in 2020, including during March of 2020.

8 5. In approximately late 2019, TST-WA appointed Leah Garvais as its Chapter  
9 Head. Leah Garvais uses the pseudonym Siri Sanguine in her work for TST. It is my  
10 understanding that before and after becoming TST-WA’s Chapter Head, Leah Garvais/Siri  
11 Sanguine was also the treasurer of TST-WA and was also formerly a governor of the for-  
12 profit “Infernal Washington, LLC,” which used “TST WA” as a business name.

13 6. On or around December 13, 2019, for personal reasons I decided to take an  
14 indefinite leave of absence from my volunteer work with TST-WA, including my work on  
15 the Strategy Council. This decision was supported by TST-WA, including Leah Garvais/Siri  
16 Sanguine and Paul Case/Tarkus Claypool, who conveyed that they warmly supported my  
17 decision to take a leave of absence. Over the next few months, I was contacted only a few  
18 times by either of them (for example, to provide login information for an email account used  
19 to handle membership applications, which I readily provided) while I focused on personal  
20 matters. I believed that at that time I was in excellent standing with TST-WA.

21 7. On March 12, 2020, while I was still on leave from my volunteer work with  
22 TST-WA, I received a mass email from Leah Garvais/Siri Sanguine. The email stated that  
23 TST-WA had been investigating a complaint made by another member, which had apparently  
24 been preceded by an argument between other council members. To my shock, the email  
25 accused me and others of having been involved in an alleged coalition ostensibly intended to  
26 attack and undermine TST’s leadership. The email announced Leah Garvais/Siri Sanguine’s

1 decision to dissolve the committee I had served on and replace it with a smaller, handpicked  
2 group. At that point, I had no idea that anyone’s membership was at stake.

3 8. On March 14, 2020, Leah Garvais/Siri Sanguine sent another mass email  
4 reiterating her plan to dissolve the existing committee and create a smaller Strategy Council.

5 9. A few hours later on March 14, 2020, Leah Garvais/Siri Sanguine sent yet  
6 another email to Mickey Meehan (a co-defendant in this suit), who at the time used the  
7 pseudonym Lenore Calavera. Garvais/Sanguine alleged that Meehan/Calavera had “stolen”  
8 a Facebook page she referred to as “TST WA Allies,” that he had renamed to “Evergreen  
9 Memes for Queer Satanic Fiends” (referred to hereinafter as “Memes Page”<sup>1</sup>). She also stated  
10 that Mickey Meehan/Lenore Calavera was now banned from TST nationwide while Garvais  
11 awaited next steps from TST’s International Council (formerly the National Council).

12 10. On the night of March 14, 2020, following Leah Garvais/Siri Sanguine’s  
13 earlier emails, Paul Case/Tarkus Claypool sent an email to my co-defendant Mickey  
14 Meehan/Lenore Calvera that Mickey shared with me. In the email, Paul/Tarkus states he had  
15 seen that Mickey/Lenore had changed the name of “TST WA Allies” page and states that  
16 Mickey/Lenore was free to use the page (the Memes Page) “free and clear” and TST had no  
17 interest in reclaiming the page:

18 Hi Lenore,

19 I saw that you made some changes to the TST WA State Allies FB group. I  
20 just wanted to let you know that it’s yours free and clear and we’ve no desire  
21 to claim it. You and ADJ built it and have done a great job doing so. I’m  
confident you’ll both continue doing awesome work.

22 Sorry the way things panned out, and I do mean all of it. I wish you and  
23 your family well, and respect your need to fight the fight your way.

24 Rock on.

25 Tarkus Claypool  
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<sup>1</sup> In its motion and pleadings, TST refers to the Memes Page as the “Allies page.”

1 Media Liaison, The Satanic Temple of Washington.

2 Attached as **Exhibit 1** is a true and correct copy of the March 14, 2020 message from Paul  
3 Case/Tarkus Claypool to Mickey Meehan/Lenore Calavera.

4 11. The following day, on March 15, 2020, Leah Garvais/Siri Sanguine, Paul  
5 Case/Tarkus Claypool, and other remaining advisors of TST-WA held an online TST town  
6 hall meeting over Zoom, attempting to provide an explanation to the rest of the members of  
7 TST-WA as to why so many members had suddenly been removed.

8 12. During the recorded town hall meeting, at approximately 30:43 minutes into  
9 the recording, Leah Garvais/Siri Sanguine displays a hand-drawn organizational chart that  
10 depicts TST's internal hierarchy as follows: Executive Ministry -> International Council ->  
11 Chapter Heads/Media Liaisons -> Members. Attached as Exhibit 1 is a true and correct photo  
12 of the Zoom town hall meeting at approximately time stamp 30:43. The abbreviation "CH"  
13 in the drawing being held up by Leah Garvais refers to Chapter Head and the abbreviation  
14 "ML" refers to Media Liaison. I understood and continue to understand this chart to mean  
15 that Chapter Heads and Media Liaisons are vested with authority to act on behalf of TST. An  
16 electronic copy of a video of that town hall meeting is submitted as Exhibit 1 to the  
17 Declaration of Jeremy Roller in Opposition to Plaintiff's Motion for Preliminary Injunction  
18 ("Roller Decl.").

19 13. In the same town hall meeting, Garvais/Sanguine explained that the reason we  
20 (the defendants in this suit) were removed as members is that we had been cc-ed on an email  
21 to TST from the former member who had made the complaint. Exhibit 1 to Roller Decl. at  
22 35:40.

23 14. In the same town hall meeting, Paul Case/Tarkus Claypool again states that  
24 TST does not want the Memes Page back:

25 I do want to say that **we're not going to, you know, ask Lenore [Mickey**  
26 **Meehan] to give the page back in any way.** I wish them well. I wish them  
well, and I hope that they continue growing that and make it a great success.  
Because they're going to fight their fight, their way. And so, let them do

1 what they want to, and I wish them well, because both Lenore and ADJ did  
2 a wonderful job in the roles that they had. It just wasn't within the TST  
3 guidelines that we are beholden to. So I want to give them due credit, and  
4 just you know, wish them well with what they're going to plan to do with it  
5 in the future.

6 Paul Case/Tarkus Claypool's statement is at approximate timestamp 1:20:35 on the video.

7 15. I am aware that in its Motion for Preliminary Injunction, TST points to a  
8 comment I made in a Facebook post on March 15, 2020, in which I say that we "stole" the  
9 Memes Page from TST. At the time I made that statement, it was meant to be glib or tongue-  
10 in-cheek as TST had already let us know that we could use the Memes Page "free and clear."  
11 By being glib and using the word "stole," I was merely trying to express that I was upset at  
12 the events and also to express the fact that the Memes Page would no longer be affiliated with  
13 TST. At that time, because TST had twice represented that it had no interest in the page and  
14 we could use it "free and clear," it was clear to me, to my co-defendants, and to anyone who  
15 saw TST's Media Liaison's statement at the town hall meeting that we were free to use the  
16 Memes Page.

17 16. Consistent with telling us that we could use the Memes Page "free and clear,"  
18 TST never asked us to give it control of the Memes Page. Although I am aware that TST  
19 worked through Facebook to remove some of my co-defendants as administrators on another  
20 Facebook page – the TST WA Chapter page – I am not aware of TST ever asking Facebook  
21 to remove us as administrators from the Memes Page. Nor did TST ever ask us to give them  
22 control of the Memes Page until this last June of 2022, when we filed our latest motion to  
23 dismiss and TST's attorney, Matt Kezhaya, then told our attorney, Jeremy Roller that TST  
24 was going to seek an injunction because it now wanted to control the Memes Page.  
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1 I declare under penalty of perjury of the laws of the United States that the foregoing  
2 is true and correct.

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4 DATED: December 12, 2022, at Seattle, Washington.

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**CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, thereby sending a notification of such filing to the following parties:

**LYBECK PEDREIRA & JUSTUS, PLLC**

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- E-mail
- U.S. Mail
- E-filing

Dated this 12<sup>th</sup> day of December, 2022, at Seattle, Washington.

*/s/ Janet Fischer*

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Janet Fischer  
Paralegal

# **EXHIBIT 1**





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## Evergreen Memes for Queer Satanic Fiends

1 message

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**Tarkus Claypool** <tarkus.claypool@gmail.com>  
To: Lenore Calavera <lenorecalavera@gmail.com>

Sat, Mar 14, 2020 at 9:09 PM

Hi Lenore,

I saw that you made some changes to the TST WA State Allies FB group. I just wanted to let you know that it's yours free and clear and we've no desire to claim it. You and ADJ built it and have done a great job doing so. I'm confident you'll both continue doing awesome work.

Sorry the way things panned out, and I do mean all of it. I wish you and your family well, and respect your need to fight the fight your way.

Rock on,

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

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**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](mailto: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.