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**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION**

TANYA GERSH,)	Case No. 9:17-cv-50-DLC-JCL
)	
Plaintiff,)	
)	
vs.)	DECLARATION OF
)	ANDREW ANGLIN IN SUPPORT
ANDREW ANGLIN,)	OF MOTION TO DISMISS
)	
Defendant.)	

**DECLARATION OF ANDREW ANGLIN
IN SUPPORT OF MOTION TO DISMISS**

I, Andrew B. Anglin, declare:

1. I am over 18 years of age and have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.
2. I submit this Declaration in support of the Motion to Dismiss, filed in this matter.
3. Upon information and belief, I am the defendant identified in the above-captioned matter.
4. I am a natural-born United States citizen and have been so my entire life. I am a citizen of no other nation.
5. I am submitting this Declaration to clarify a misunderstanding that resulted in an error in the memorandum in reply to Plaintiff's opposition to the motion to dismiss.
6. Although I maintained a Russian address in October 2016 as set forth in my application for an absentee ballot, I was not a Russian domiciliary.
7. Before 2010, I left the State of Ohio, with no intent to live there permanently again.
8. Since before 2010, I spent very short amounts of time in Ohio, not more than three visits to my recollection, once for a few weeks and once less than a year.

9. I renewed my U.S. passport in 2013, so I do not have full and accurate records of my international travel prior to that date.

10. I left Ohio, and the United States, for the last time on July 3-4, 2013, and I have not returned since.

11. I was not in the United States on December 10, 2017 and I did not encounter Jeffrey Cremeans or anyone else in a Meijer's grocery store in 2017.

12. I do not own any real property in the State of Ohio.

13. I do not maintain any residence in the State of Ohio, whether by lease, license, or otherwise.

14. I do not own any motor vehicle registered in the State of Ohio.

15. I hold no professional license issued by the State of Ohio.

16. I do not pay income taxes to the State of Ohio.

17. I do not pay consumption or property taxes to the State of Ohio or any county, city, or municipality in the State of Ohio.

18. I do not carry any form of property or liability insurance produced in the State of Ohio.

19. I do not have any loans with an Ohio billing address.

20. I am registered to vote in the State of Ohio, by operation of Federal law, as that was my last domicile prior to leaving the United States.

21. Before 2010, I took up residency in the Philippines, with the intent to live there permanently. As I obtained a new passport in 2013, I do not have documentation of my travel to the Philippines.

22. In 2013, I moved to Greece, with the intent to live there permanently.

23. Prior to moving to Greece, I traveled to the Consulate General of Greece in Chicago to obtain the requisite visa. I was advised to enroll in an academic program once I entered Greece in order to obtain the most useful visa.

24. Rather than enrolling in an academic program, I obtained employment as a tour guide for the Athens International Youth Hostel, located at 16 Viktoros Hugo Street, in Athens, Greece.

25. At that time, I considered Greece my permanent home, although I traveled to other countries in Europe from time to time.

26. On April 14, 2017, I moved to the Kingdom of Cambodia, with the intent to live there permanently.

27. While in Cambodia, I lived at the Damnak Villa Boutique, located in the Old Market Area, Wat Damnak Village, in Siem Reap City.

28. While in Cambodia, I purchased a motorcycle, which I still own.

29. I have temporarily left Cambodia, entrusting the care of the motorcycle to an individual at Damnak Villa, with the intent to resume use of the motorcycle upon my return.

30. In April 2017, when Plaintiff filed her Complaint, my domicile was Cambodia, and I had not re-established a domicile in Ohio or anywhere else in the United States as of April 2017.

31. Attached hereto as Exhibit A is a true and correct copy of excerpts of my passport evidencing my travel to Greece and Cambodia.

32. I now currently continue to be domiciled outside of the United States, however, for reasons of personal safety, I cannot publicly file proof of my current whereabouts.


33. Unlike Plaintiff, who alleges she received specious threats, I regularly receive true threats of injury and death.

34. For example, the Court may well be aware of the videotaped assault on Richard Spencer and the “punch a Nazi” movement. As publisher of the Daily Stormer, however, I am targeted for more severe injury, including credible death threats.

35. Should the Court require, I will make any necessary *in camera* submission. Although, ordinarily, I would have no objection to an attorneys’ eyes only provision of the submission to a plaintiff’s attorney, the Southern Poverty Law Center is a biased and untrustworthy entity that has already shown itself to give no regard to the rules of legal ethics, and, upon information and belief, one of whose followers recently shot a sitting Congressman and another who shot a guard at the Family Research Council.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 1/17/2018.

DocuSigned by:

533439F69BC64CD...

Andrew B. Anglin

EXHIBIT A

Passport Excerpts



...od,
shall have a new birth of freedom.
Abraham Lincoln

ยกเว้นค่าธรรมเนียม
Visas
GRATIS
Tourist

ROYAL CAMBODIA
20-1-20-22-00-1-20

ห้ามจ้างงาน
Employment Prohibited

[Handwritten signature]

ROYAL THAI EMBASSY
VIENTIANE

No. *LB 504456/60*

Category **'TR'**

Good for **'S'** journeys to Thailand.

This visa must be utilized before **29 APR 2017** if passport remains valid.

[Red circular official stamp]

MR. SOMPOP SERMSWATSR

COUNSELLOR
30 JAN 2017

35





KINGDOM OF CAMBODIA

Extension of stay

Phnom Penh

Issuing Post

Fee

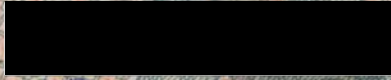
Surname

ANGLIN

Given Name

ANDREW BARRET

Passport Number



EI 01172708

Entries

MULTIPLE

Issue Date

05 MAY 2017

Expiry Date

04 DEC 2017

Remarks

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Sam Virak

EB

Pol. Maj. Gen. SAM VIRAK



st. Young man,

