EXHIBIT A

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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH - CENTRAL DIVISION

BAM FRANCHISING, INC., AMMON MCNEFF, MATTHEW MCNEFF, JOSH JOHNSON, BRANDON BEST, BAKER BRICKS, LLC, dba SALEM-BAKER BRICKS INC, Plaintiffs, vs. BENJAMIN PAUL SCHNEIDER, RECKLESS BEN LLC, BRYAN MANSEL, VICTOR NGUYEN. Defendants.	**DECLARATION OF GREGORY C. BELMONT IN SUPPORT OF REFILED FEDERAL MOTION TO INTERVENE** Case No. 2:26-cv-00593 Magistrate Judge Cecilia M. Romero

I declare under penalty of perjury under 28 U.S.C. § 1746 that the following is true and correct.:

1. **Identity:** I am an individual over the age of 18, a resident of the State of New York, and the Movant seeking limited intervention in this matter.
2. **Listener Interest:** I am a Premium YouTube subscriber to Defendant Benjamin Schneider's channel titled "Reckless Ben" and a paid subscriber to Schneider's Patreon platform. I am a consumer and hobbyist reseller of LEGO, toys, and games with an interest in the commercial practices underlying this retail controversy. I also engage in private, semi-public, and occasional public commentary on legal issues of broad interest, including on police conduct. A video I produced and published analyzing an instance of police misconduct has received

over one million views on YouTube and has been credited with catalyzing the initial popularization of a mass national social movement. ("No Thank-You Note, but Several Lawsuits for a Pepper-Spraying Inspector", Sept 29, 2012, New York Times.)

3. **Motion to Intervene:** I previously filed a Motion To Intervene For Limited Purpose And To Partially Vacate Temporary Restraining Order in the Fourth Judicial District Court for Utah County on June 11, 2026, which has been preserved in this Court's record along with related motion to expedite, opposition to both motion to intervene and motion expedite, a reply to the opposition to the motion to expedite, and a notice of changed circumstances and request to narrow requested intervention in light of a stipulation reached by the parties to modify the TRO and enter a preliminary injunction without the speech restrictive provisions I challenged.

4. **Followed Schneider's Investigative Videos:** In late May, 2026, by accessing my Premium YouTube subscription, I watched two videos produced and posted by Schneider dramatizing his attempts to resolve a consumer business dispute between Defendant Bryan Mansell and the Plaintiffs involving a LEGO collection. These two videos are among those the Plaintiffs specifically sought to enjoin in their Motion for TRO ("I tracked down the thief who stole $200,000 of LEGO", 6.4 million views, posted May 21, 2026, https://youtu.be/wscQpkcwgNU and "I got arrested because of legos, posted", posted May 30, 2026, 4.7 million views, https://www.youtu.be/cxZPfj8AlmY).

5. **Subscribed to Schneider's Channels**: After watching these videos, I subscribed to Schneider's YouTube channel in order to receive notifications when new content is posted and paid to subscribe to Schneider's Patreon channel in order to watch his prior investigative videos and new content he may exclusively post to the platform about the dispute.

6. **Chilling Effect on Speaker:** On June 9, 2026, I attempted to view new content from

Defendant Schneider. I viewed a video uploaded to his channel titled "My final message," which has now garnered over 5,000,000 views. In that video, Schneider explicitly stated, *"Episode 3 is finally finished... but I can't post it,"* and directly attributed his self-censorship to electronic service of the ex parte TRO. (URL https://youtu.be/sISjfdueTYg). Exhibit B.

7. **Suppression of Access:** The speech-restrictive provisions of the state court TRO have directly cut off my access to information, investigative journalism, and content that I regularly pay to view.

8. **Disruption of Public Donations to Legal Fund:** On June 9, 2026 through the following day, I observed that a public GoFundMe.com webpage titled "Help Bryan Recover His Stolen LEGO Collection," which had accumulated $465,847 from over 17,000 citizens to fund legal expenses of Defendant Bryan Mansell became unavailable for approximately 12 to 18 hours. Public commentary and attached transcripts reflect concern that the disruption was connected to Plaintiffs' TRO enforcement efforts. I observed that this page was abruptly disabled for 12 to 18 hours due to corporate pressure leveraging the existence of the state court's order. (URL https://www.gofundme.com/f/help-bryan-recover-his-lego-collection, archived on June 8th at https://web.archive.org/web/20260608012210/https://www.gofundme.com/f/help-bryan-recover-his-lego-collection).

9. **Chilling Effect on Non-Parties:** On June 10, 2026, I observed further marketplace chilling effects when independent online creator Sheldon Norcross published a video monologue titled "Ammon mcneff shut down Bryan's go fund me" in which he expressed severe anxiety that his channel would be "silenced next" and taken down for sharing commentary on the matter of this litigation. I knew Mr. Norcross to be an individual who was shown being detained without being charged with a crime by the American Fork Police Department ("AFPD") in a video produced by Defendant Schneider which Plaintiffs described in the

Verified Complaint in this action (p. 20) and which is among those they have sought to have removed from public viewing. The shown interaction between AFPD and Mr. Norcross are the subject of significant public commentary, including by experienced civil rights attorneys specializing in police misconduct, much of which is highly critical of the police and is widely believed to be the subject of an impending civil rights complaint. (URL https://youtu.be/o4bdTuqzGQo). Exhibit C.

10. **Extrajudicial Takedowns:** I have watched a YouTube video posted by Patreon CEO Jack Conte on May 29, 2026 titled "Take Down Notification: Reckless Ben's Patreon Account" wherein he describes receiving from Plaintiffs a "Request for Immediate Content Removal Pursuant to TRO" attempting to leverage unsealed state court filings to achieve extrajudicial censorship of digital accounts. (URL at https://youtu.be/36jxNeV5L1Q). Exhibit D.
11. **Plaintiffs' Admissions:** On June 4, 2026, I read an official corporate press release blog published by Corporate Plaintiff BAM Franchising. In it, BAM Franchising admitted to pervasive "gross negligence" at the Salem, Oregon store, acknowledged "operational gaps," validated the existence of an "unauthorized private consignment arrangement" involving Defendant Mansell's collection, and confirmed that point-of-sale data showed over $52,000 of the disputed collection was sold without proper authorization. (URL https://bricksandminifigs.com/blog/blog/2026/06/04/bricks-and-minifigs-salem-joshua-johnson-brandon-best-resignation). Exhibit E.
12. **Plaintiff's Further Communications**. After June 9, 2026, during the time while Defendants and nonparties were chilled by the TRO, I watched several YouTube videos in which Plaintiff Ammon McNeff and Matthew McNeff, CEO and COO respectively of Plaintiff BAM Franchising, Inc., provided extensive public interviews on the subject of the instant litigation including the following videos which are listed with their URL, title, posting date, and

rounded approximate page views as of June 29, 2026:

	Title	Posted On	Posted By	Views	URL
	"I Found The $200000 Missing Lego"	6/10/26	COffeezilla	7.3M	https://youtu.be/VKfQkRbd15k
	"'A franchisee went rogue.' Bricks & Minifigs CEO responds to Reckless Ben's allegations"	6/4/26	2026 by FOX 5 Washington DC	215K	https://youtu.be/_01kgM7xSVc
	"Bricks & Minifigs CEO Responds to the Allegations and Reckless Ben"	6/3/26	posted by ACOB	26K	https://youtu.be/fJHF6Hwdmz4
	"BAM COO Speaks On The Salem LEGO Star Wars Controversy (Uncut)"	5/29/26	2026 by ACOB	27K	https://youtu.be/5ngkiNRhY38

13. **Redacted Police Conduct Video and Commentary**: On or around June 1, 2026 I watched an approximately 16 minute video posted by Ben Schneider on that date ("My response to the Police" at https://youtu.be/2YEzhDn0jY8) describing this response to an approximately 26.5 minute video I subsequently watched which was posted by the American Force Police Department ("AFPD") ("Bricks and Minifigs/Benjamin Schneider Media Release" at https://youtu.be/IcVmSQpIPRY) three days prior. Both videos describe the respective posters' perspective on selective video clips of police activity that occurred between March 8 and March 11, 2026 involving events described in the Verified Complaint and Motion for Temporary Restraining Order in this action.

14. **Unredacted Police Video Archive**: On or about June 3, 2026 and since, I have reviewed a publicly accessible video archive sourced to a clerical error by the American Fork Police Department consisting of dozens of unredacted body and dash cam videos of police personnel involved in many of the events and events adjacent to those described in the Verified Complaint and Motion for TRO and documented by Schneider's videos the Motion for TRO sought to enjoin– including arrests and interrogation of Schneider. The unedited perspective provided by of these videos of events that had already become hotly discussed in YouTube videos and video comments as a result of unredacted clips being incorporated in Schneider's videos (), spawned significant additional public commentary by attorneys, law

enforcement experts, civil rights auditors, and others about police and prosecutorial conduct, some of which is highly critical and speculates on the depiction of serious civil rights violations and contradictions with explanations sympathetic to Plaintiffs and government provided by AFPD Chief in the May 29th video (*See* ¶ 13). (Video archive at https://archive.org/details/american-fork-bodycam-unredacted.)

15. **Post Removal Communication**. Today, June 29, 2026, I read a press release issued by Plaintiff BAM Franchising, Inc. titled "Bricks & Minifigs Determined to Find Amicable Resolution with Mansell Family" referencing the family of Defendant Bryan Mansell and commenting on the underlying dispute. Exhibit F.

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

Executed on June 29, 2026, at New York, New York.

/s/ Gregory C. Belmont
Gregory C. Belmont
June 29, 2026