

County of Lanark    )  
  )  
Province of Ontario )

1. That my name is Rachel Chambliss.
2. That I am submitting this affidavit under a pseudonym to protect myself from harassment due to my employment and membership with The Satanic Temple (“TST”).
3. I joined TST as paid contractor in September of 2021.
4. My job for TST is to provide email administrative support. My job duties include answering emails to the general website, editing the TST monthly newsletter, and other special projects. Included in those special projects is monitoring social media for comments about TST. I look for both positive and negative comments and I flag defamatory comments for further review.
5. Shortly after joining TST, I was made aware of the dispute between TST and the Defendants. Since that time, I have monitored social media for comments and posts related to Defendants and this lawsuit. Comments by and about

Defendants are prolific on those areas of social media where TST is discussed. One cannot view content about TST on social media sites without encountering posts by Queer Satanic, or posts that share their talking points. Those talking points are then shared by other social media users.

6. That I have first-hand knowledge of the some of the factual allegations made by both TST and by the defendants in this case. I also have firsthand knowledge of the harm TST has suffered as the result of Defendants' commandeering of TST's Facebook and Twitter pages.
7. That Defendants are passing off TST's Facebook page, now known as Evergreen Memes for Queer Satanic Fiends ("the TST Allies page") as their own page.
8. That Defendants are using TST's Allies Page to spread messages that are against TST's tenets and not approved by TST.
9. That on March 14, 2020, Defendants posted on the TST Allies page that they had taken over that page and that the

page was no longer affiliated with TST.

10. That Defendant David Johnson admitted on a podcast called Dixieland of the Proletariat dated February 15, 2022 that he used his admin rights for TST's Facebook page to post statements against TST on TST's Facebook page to further his personal agenda against the organization. Specifically, he stated in the podcast that "about a week later I was still admin of the local chapter page. So I used the admin rights to . . . basically talk about what had actually happened and also criticize the national leaders." A transcript of this podcast is attached to this Affidavit as exhibit A.

11. My experience in monitoring Defendants' social media and internet activity clearly shows that Defendants are actively trying to harm TST. Part of their activity involves their use of the TST Allies Facebook page. It is my opinion that the Defendants' agenda and the QueerSatanic social media handle's sole purpose in is to harm TST. I believe that they would not and could not exist without this purpose.

12. Part of that experience has shown that Defendants, operating under the name QueerSatanic, insert themselves into conversations about TST on Reddit and disparage TST. However, they do not typically insert their disparaging talking points into conversations about TST where potential TST members are not likely to be found. This tells me that the Defendants' sole purpose is to prevent people from becoming TST members.

**FURTHER YOUR AFFIANT SAYETH NOT.**

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

Executed on November 22, 2022,

*s/Rachel Chambliss*