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IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

STATE OF OREGON,

Plaintiff,

v.

JOSEPH OWAN GIBSON,

Defendant.

Consolidated Case No. 19CR53042

**DECLARATION OF JOSEPH OWAN
GIBSON IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
FOR SELECTIVE PROSECUTION**

STATE OF OREGON,

Plaintiff,

v.

RUSSELL SCHULTZ,

Defendant.

Consolidated Case No. 19CR53035

16. Police did not involve themselves with the protest whatsoever.

17. Police did not declare a "riot" at any point.

18. I have previously filed a declaration in the case of *Cider Riot, LLC et al. v. Patriot Prayer USA, LLC et al.*, Multnomah County, Case No. 19CV20231 providing further details concerning the May 1, 2019 protest, a true copy of which is attached hereto as Exhibit 1, and incorporated herein by reference.

19. Approximately two months after the protest, I learned I was charged by the Multnomah County Prosecutor's Office with a single count of riot.

20. I believe timing of the charge and issuance of an arrest warrant was to prevent my participation in an "End Domestic Terrorism" rally and demonstration against Antifa, which had been planned for August 17, 2019, as well as deterring others opposed to Antifa from attending that rally.

21. I was later booked into custody, and later released after posting bail.

22. I have greatly reduced my political activity in the Portland area out of fear that additional baseless charges will be filed.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

4/19/2021 | 1:12:24 PM PDT

Executed on this ____th day of April, 2021.

DocuSigned by:



Joseph Owan Gibson

EXHIBIT 1

Video (DX9 through DX11) Referenced in the this Exhibit are
Filed Conventionally

IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

CIDER RIOT, LLC; and ABRAM
GOLDMAN-ARMSTRONG,

Plaintiffs,

v.

PATRIOT PRAYER USA, LLC; JOSEPH
"JOEY" GIBSON; IAN KRAMER;
CHRISTOPHER PONTE; DAVID WILLIS;
MACKENZIE LEWIS; MATTHEW
COOPER; and JOHN DOES 1-25.

Defendants.

Case No. 19CV20231

**DECLARATION OF JOEY GIBSON IN
SUPPORT OF DEFENDANTS' SPECIAL
MOTION TO STRIKE**

Joey Gibson declares:

1. I am a defendant in this action. I own 100% of Patriot Prayer USA, LLC, a Washington limited liability company (hereafter, "LLC"), and am authorized to speak on behalf of the LLC. Unless otherwise specified below, I make this Declaration based on my personal knowledge or information as alleged herein in support of my special motion to strike plaintiffs' complaint pursuant to ORS 31.150, and also to support my companion motion for a change of venue.

2. Plaintiffs' complaint contains a great deal of false and misleading information about me beyond the bare facts concerning my visit to the sidewalk and streets adjacent to Cider Riot on May 1, 2019, which is the only time I have been near the establishment. To the extent the Court wishes to know the true facts concerning that incident, my response begins in paragraph 54 below.

1
DECLARATION OF JOEY GIBSON IN SUPPORT OF DEFENDANTS'
SPECIAL MOTION TO STRIKE
Case No. 19CV20231

James L. Buchal, (OSB 921618)
MURPHY & BUCHAL LLP
3425 SE Yamhill Street, Suite 100
Portland, OR 97214
Tel: 503-227-1011
Fax: 503-573-1939

1 3. Nevertheless, it seems appropriate to respond to plaintiffs’ personal attacks, and in
2 some cases, I present hearsay in the form of newspaper and other accounts, because plaintiffs make
3 accusations about events with which I was not involved, and it seems appropriate to provide the
4 Court with the information I have heard or which has been published in local media.

5 **Why I Engage in Protected First Amendment Activity**

6 4. I and many others believe that the United States is currently engaged in a spiritual
7 struggle against evil, manifested in many ways. One manifestation of this evil is the rise of violent,
8 thuggish gangs operating in the City of Portland, Oregon, which attack fundamental American
9 values and support a Godless socialist or communist regime, the establishment of which would
10 threaten America’s future.

11 5. One of the first times the threat in Portland was really driven home to me was when I
12 was in downtown Portland after the election of President Trump in November 2016, and saw a
13 pregnant woman trapped in a car, with masked demonstrators and others attacking the car, even
14 smashing its windshield with a baseball bat, for no apparent reason. I was one of only a couple of
15 people trying to protect her from the crowd.¹

16 6. There are a variety of these violent groups operating in Portland, including “Rose
17 City Antifa,” “RASH Northwest” (which describes itself as a Chapter of RASH, standing for Red &
18 Anarchist Skinheads), the “Pacific Northwest Antifascist Workers Collective,” “Portland’s
19 Resistance,” “Stand Up,” “Occupy ICE PDX” and “Fight Back”.

20 7. For purposes of this Declaration, I will use the term “Antifa,” short for “anti-fascist,”
21 to characterize these groups. I will also refer to individuals associated with their groups and/or their
22 beliefs as “members” of Antifa, recognizing that there is no single “Antifa” entity, and the groups
23 mentioned above probably have no formal membership. It is a form of shorthand, just as plaintiffs
24 call people who stand with me at events “members of Patriot Prayer”.
25

26

¹ A video report by KGW concerning this incident is posted at https://youtu.be/T259Yh_cxJM.

1 8. While Antifa styles itself as combating fascism, it is, according to social media posts
2 by some members or groups, devoted to the overthrow of the most fundamental principles of liberty
3 and freedom in the United States. Attached as Exhibit 1 is a screenshot of a Twitter post (a/k/a
4 “Tweet”) of the Rose City Antifa account on July 5, 2018, expressing the aspiration that the
5 “Dekkklaration [of Independence] and the Constitution will soon be relics of the past, just like the
6 statues of the racist Generals throughout the Racist States”.

7 9. In addition to fomenting violence and property destruction on the streets of Portland,
8 Antifa publicly praises it. Attached as Exhibit 2 is a screenshot of a Twitter post of the Rose City
9 Antifa account on July 5, 2018, in which photographs are posted in which property is burning,
10 declared to be “inspiring,” and Antifa declares: “today they call us the enemy, tomorrow we will be
11 the police force they bow to and we will enforce the tenants [sic] of our Democratic Socialist
12 society by any means necessary.” The tenets of Antifa beliefs are extreme and extend to the
13 abolition of private property, as reflected in Exhibit 3, a screenshot of a July 14, 2018 Twitter post
14 from the Rose City Antifa account.

15 10. As time passes, Antifa’s violence and support for it grows more extreme. It is
16 publicly reported that since this suit was filed, a Seattle man, leaving a manifesto claiming “I am
17 Antifa,” attacked an Immigration and Customs Enforcement facility in Tacoma, armed with a rifle
18 and incendiary devices; after setting several vehicles on fire he was shot dead by police while trying
19 to ignite a propane tank.² Local Portland Antifa groups then organized an event to “[s]tand with us
20 to honor our fallen comrade”.³ For plaintiffs, allied with groups in comradeship with violent
21 terrorists, to sue me based on false accusations of support of violence is diabolically hypocritical.

22 11. Members of Antifa commonly hide their faces behind masks (one of their mottos is
23 “no face, no case”) and they have been involved, long before this suit was filed or I took an interest
24 in their activities, in repeated instances of violence and public disorder in Portland, Oregon and

25 ² <https://www.foxnews.com/us/washington-man-killed-at-ice-detention-center-manifesto>

26 ³ <https://twitter.com/OccupyICEPDX/status/1150894738289000448>.

1 throughout the Nation. I have personally witnessed masked members of Antifa beating and abusing
2 people on many occasions, without any provocation beyond the mere presence of people
3 erroneously labelled as fascists or racists, and the injustice of this conduct, often tolerated by law
4 enforcement agents in Portland and elsewhere, deeply concerns me. In the most recent incident
5 since the filing of this complaint, reporter Andy Ngo was severely beaten and sent to the hospital
6 after a demonstration on June 29, 2019, an event that received nationwide attention.

7 12. I love America and am deeply and personally distressed to see the rise of those who
8 appear to hate it, constantly make dishonest and unfair attacks upon it, and pose a threat to public
9 order. I feel called to expose this evil within our community. I regard myself as a patriot, and one
10 who prays that my fellow Americans will come to see the threat posed by groups like Antifa and
11 make it as socially unacceptable for young people to be associated with such groups as it would be
12 for them to be associated with the Nazi or neo-Nazi movements they resemble. I also aim to
13 encourage governmental action to limit the activities of Antifa.

14 13. My primary goal in holding public events is to reach and save members of the public
15 by restoring an appreciation for the Nation's founding principles, both spiritual and as embodied in
16 our Constitution and Bill of Rights. In general, I attempt to engage members of Antifa one and one
17 and come to a dialog, trying to get them to wake up and cease affiliation with Antifa. When
18 members of Antifa respond with violence, I remain nonviolent and do my best to publicize their
19 response, so as to show Americans the nature of Antifa, and the threat it poses.

20 **How I Organize Events, and the Problem of Violence**

21 14. The LLC is a media company which accepts donations and funds my activities as
22 described below. It is not a membership organization, and there are no members of Patriot Prayer
23 USA, LLC besides me. It has no contracts, formal or informal, with any other person or entity.

24 15. The primary avenue I use to organize events is a Facebook account,
25 @PatriotPrayerUSA. Through "event" postings on Facebook, I invite people to come and
26 participate in events where I appear and engage in protest activities. At no time, however, was any

1 May 1, 2019 event at Cider Riot posted on that page, nor did I make any other efforts to organize
2 and event at Cider Riot that day.

3 16. I have conducted nearly ninety events from 2017 to 2019, organized through my
4 Facebook page, of which only about fifteen were held in Portland. A true copy of the Facebook
5 page listing these events is attached hereto as Exhibit 4.

6 17. One of those rallies was the subject of a favorable opinion piece in *The Oregonian*,
7 the aftermath of which is discussed at length in my Declaration in support of my motion for a
8 change of venue, filed herewith. Specifically, on or about October 23, 2018, I held a rally at
9 Washington State University in Vancouver, and an Oregonian columnist Elizabeth Hovde, who is
10 an adjunct professor at the University, accurately reported as follows:

11 “For two hours, I watched challenging, inquisitive, respectful conversations
12 happening on the campus plaza between people of different political persuasions.
13 Instead of the violence predicted, Gibson brought something we need more of:
14 talk that leads to increased understanding about opposing thoughts and the people
15 behind them. It was the kind of conversation that helps people find common
16 ground.”

17 (A true copy of Ms. Hovde’s column is attached hereto as Exhibit 5.) There was, as she reported,
18 “zero violence” at the rally.

19 18. The people who come to these events are commonly referred to as “Patriot Prayer
20 members” in the press, but I cannot control the people who chose to come, or follow me of their
21 own free will, or simply show up on their own, and they sometimes engage in conduct of which I
22 disapprove. At no time did I exercise control over any defendant in this action, other than the LLC,
23 which I do control.

24 19. I can only exercise what influence I have to urge individuals present to restrain
25 themselves, which I do as best I can. I have a consistent, publicly reported pattern of seeking to
26 discourage any violence among people attending my events.⁴ Some of my activity at Cider Riot on

27 ⁴ See, e.g., C. Parks, *The Oregonian*, “Live updates: Free-speech, Antifa protests converge in
28 Portland,” June 4, 2017 (“Organizer Joey Gibson tells the crowd to please ‘not beat up anybody on

1 May 1st was an effort to restrain those who were under attack from the Antifa contingent at the bar,
2 events I describe in detail below.

3 20. None of the violence at the events I have promoted on Facebook involved violence
4 initiated by me. As far as I know, none of those events involved violence initiated by anyone
5 choosing to stand with me. However, some of the events have drawn a violent response from
6 Antifa elements. Specifically, at approximately eleven events of the events listed in Exhibit 5, two
7 of which were held outside of Portland, members of Antifa showed up and assaulted event
8 participants.

9 21. For example, in May 2017, it was publicly reported that a biology professor at
10 Evergreen State University in Olympia was attacked by students for daring to write that: “On a
11 college campus, one’s right to speak—or to be—should never be based on skin color.” When I
12 organized a rally in support of the professor on the campus on June 15, 2017, with the objective of
13 protesting political correctness and hatred, persons I identified as members of Antifa by their black
14 or dark clothes and face masks and protest signs violently attempted to disrupt the rally. I was hit in
15 the face with a can and pepper-sprayed, and the tires of my vehicle and those of others attending
16 and opposing political correctness and hatred were slashed. Can I prove precisely who did this?
17 No, but this is the sort of behavior that confirms my will to publicize the activities of these groups.

18 22. It my personal and spiritual objective to avoid violence, and neither I nor the LLC
19 have as our goal the creation of violence. I want to change minds, or that failing, to draw attention
20 to the evils that are closing American minds. On many occasions, I have walked into dangerous
21 situations, and been attacked, but I have never fought back, though I may on occasion push people
22 away who are attacking me and fend off blows.

23 23. In addition to frequently speaking in university settings to young people, I sometimes
24 appear on the radio; the very events about which plaintiffs complain were the subject of interview
25

26 your way out of here.’’) (available at
27 https://www.oregonlive.com/portland/2017/06/portland_free_speech_protests.html).

1 on the Lars Larson show. Interestingly, during the show, Mr. Larson suggested that plaintiff Cider
2 Riot was subject to regulation by the Oregon Liquor Control Commission, and that it would be
3 appropriate to bring to the attention of the Commission the behaviors evident on May 1, 2019, by
4 Cider Riot patrons and others.

5 24. The ability of Americans with powerful moral and political objections to the conduct
6 of their fellow citizens (and others) to voice these objections, and call attention to these issues, has a
7 long and honored tradition in American history. This includes Martin Luther King’s determination
8 to march in Southern cities under conditions where Southerners used the same sort of language now
9 used by plaintiffs in their complaint to complain about the conduct of protestors.

10 25. One might argue that MLK “baited” Bull Connor into turning his fire hoses upon the
11 marchers in Birmingham, Alabama, just as our appearance brings forth the evil within Antifa
12 supporters so that it is manifest and visible to the American Republic. Just as the images of the
13 marchers in the Birmingham Campaign being attacked with fire hoses and police dogs turned
14 American public opinion against Southern racists, so too do images of Antifa violence turn
15 American public opinion against the destructive political changes or even revolution sought by
16 Antifa, and bring about law enforcement activities to limit the growth and development of Antifa.

17 **Response to Plaintiffs’ Scurrilous Attacks**

18 26. In the companion declaration in support of my motion for a change of venue, I
19 discuss the incredible hostility of Portland leaders, journalists, and the “progressive” community
20 that constitutes an overwhelming majority of Portlanders and likely jurors. This hostility is fueled
21 by a pattern of biased reporting discussed in detail in that Declaration.

22 27. Plaintiffs’ complaint builds upon this effective propaganda campaign by filling their
23 complaint with terms like “right-wing extremist group Defendant Patriot Prayer USA, LLC”. (¶ 1.)
24 I view the use of these terms as part and parcel of a larger political strategy of the Left to portray
25 particular political positions which until recently enjoyed bipartisan support—such as support for
26

individual rights under the Second Amendment and support for enforcement of national borders against illegal immigration—as “extreme”. I am not an extremist, and neither is the LLC.

28. The complaint also attempts to associate me and the LLC with “white supremacy, white nationalism, and general xenophobia” (§ 1). None of these concepts have anything to do with me or the LLC. I am on record at one event as having I am half-Japanese, and many of the attendees at events I have promoted are not white. While I did not promote the visit to Cider Riot on May 1st, I note that more than one nonwhite individual attended to show opposition to radical anarchy and socialism.

29. By August 2018, I found the nature of media coverage of my activities sufficiently biased that I publicly offered a \$2,000 reward for anyone who could come forward with any statement from the hundreds of hours of public appearances I had personally made which was “far right wing” or “hateful”. The reward remains unclaimed.

30. Nor have I or the LLC “marked Portland as a target for violent intimidation” or had any objective “to shutdown public democratic spaces through incitements of violence”. (¶ 1). I have indeed seen Portland as one of many locations for me to exercise my First Amendment rights, for reasons explained in detail below, but my objective is never to initiate violence. At all relevant times, residents of Portland who are exposed to the ideas or positions I present have the choice of responding with words—or with thrown objects, pepper spray, and fists.

31. By contrast, violent Antifa groups with which plaintiffs are associated have a stated objective of using violence to “de-platform” those with whom they disagree politically, calling them “fascists”. They include me in that class. In substance, it is these groups that do what I am accused of: “shutdown public democratic spaces through incitements of violence” (¶ 1.) Some of the Antifa groups are organized into networks, such as the “Torch Network,” which declares on its website that the first “point of unity” among the groups is to “disrupt fascist and far right organizing and activity”.

1 32. For example, it was publicly reported that one of these groups, Rose City Antifa,
2 released a video encouraging people to counter-protest my Gibson for Senate Freedom March in
3 August 2018, in which they stated: “History has shown that militant resistance is a necessary and
4 important tool in the fight against fascism. . . . We make no apologies for the use of force in
5 keeping our communities safe from the scourge of right-wing violence.”⁵ In contrast to this violent
6 perspective, I have never advocated the use of force in this fashion. I am careful to state that
7 violence is only justified in self-defense against physical violence—not in defense against ideas to
8 which people object.

9 33. At all relevant times within Portland, the Antifa groups have substantially
10 outnumbered me and others who have chosen to stand with me as a matter of their political
11 expression, and it is Antifa whose goal is “to intimidate” or “conduct campaigns of terror under
12 cover of night”. (¶ 12.) Neither I nor the LLC intimidated plaintiffs or “minorities, immigrants
13 and/or leftists,” much less conducted “campaigns of terror under cover of night”. (¶ 12.) These
14 accusations are false and malicious.

15 34. It is also important to understand that members of the Left, like plaintiffs and their
16 attorneys, use words like “violence” and “intimidation” in a non-conventional way. As a matter of
17 political objective, the Left seeks to blur any line between words and deeds and frequently
18 characterizes mere exposure to political positions with which they disagree as “violence” or
19 “intimidation,” thereby to rationalize or legitimize their own use of actual violence or intimidating
20 tactics.

21 35. Plaintiffs also allege that “Patriot Prayer exists as a cipher for other violent groups to
22 conduct paramilitary actions in the Portland metro area,” then alleging that “their [presumably
23 referring to other violent groups’] activities have culminated in a number of protests marked by
24 state and right-wing violence”. (¶ 12.) The “state violence” to which plaintiffs refer is the Portland

25 ⁵ A. Templeton, *OPB News*, “Joey Gibson, Lacking Oregon Permit, Says He Will Not Carry Gun At
26 Rally,” Aug. 3, 2018 (available <https://www.opb.org/news/article/joey-gibson-oregon-rally-gun-patriot-prayer-antifa/>).

1 Police Bureau responding to Antifa violence, and most (but not all) of the people arrested at
2 Portland demonstrations have, to the extent their political affiliation was known, been on the Left,
3 and not the right-wing.

4 36. With regard to the allegation that that “Patriot Prayer exists as a cipher for other
5 violent groups to conduct paramilitary actions in the Portland metro area,” as set forth above, most
6 of the events I organize on Facebook are outside Portland, and are successful without violence; as
7 noted above, I have continually made efforts to avoid violence, and as set forth below, I did so on
8 May 1, 2019 as well.

9 **Why I Perceive Plaintiffs as the Object of Legitimate Political Protest**

10 37. I believe that plaintiff Cider Riot, LLC and its owner Abram Goldman-Armstrong
11 are closely allied with Antifa, and that this association is publicly known and opposed by many
12 people other than myself. For example, attached as Exhibit 6 is a true copy of an Oregon Liquor
13 Control Commission “Intake/Compliance Action Report” relating to events occurring near the
14 premises of plaintiff Cider Riot on January 20, 2018; it is reported that plaintiff Abram Goldman-
15 Armstrong “was holding a political event following a protest in downtown Portland. A group of
16 patrons was outside in the ‘patio’ area when an unknown person began to heckle them and make
17 political comments,” after which a fight ensued.

18 38. I had nothing to do with this event at Cider Riot. It was one year after the
19 inauguration of President Trump, and I had put up a Facebook event inviting people to a Night
20 Time Freedom March (*see* Exhibit 1, at 4); and many Leftist groups were out “protesting Trump,
21 fascism and advocating for progressive politics,” to quote *Willamette Week*.⁶

22 39. Many public reports confirm that the Cider Riot premises have been repeatedly made
23 available for various causes associated with Antifa. For example, the *Portland Mercury* reported
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25 ⁶ K. Shepard, *Willamette Week*, “Women’s March and Trump’s Inauguration,” Jan. 18, 2018
26 (available at <https://www.wweek.com/news/city/2018/01/18/half-a-dozen-protests-planned-in-downtown-this-weekend-to-mark-anniversary-of-womens-march-and-trumps-inauguration/>).

1 that on September 8, 2018, Cider Riot hosted an event described in the Portland Mercury as
2 follows:

3 “Rose City Antifa, African & Native Solidarity PDX, and the Pacific NW
4 Antifascist Workers Collective come together to help host this discussion focused
5 on the strategies and practices used by the German Antifaschistische Aktion
6 group dating back to 1932 and moving all the way to the present.”⁷

7 40. Attached as Exhibit 7 is a true copy (albeit cropped) of a screenshot I captured off
8 Facebook reporting a January 25-27, 2019 event hosted by Cider Riot and “RASH Northwest,”
9 which claims to be the “fourth benefit event for . . . The International Anti-Fascist Defense Fund”.
10 According to a Facebook post from the Rash Northwest Account, merchandise sold at the benefit
11 included things like T-shirts with pictures of masked men with the caption “Fight Fascism” or
12 “Fight Me Proud Boy”.

13 41. According to newspaper reports, Cider Riot also presented “an opportunity to listen
14 to Dr. Stanislav Vysotsky as he provides an overview of fascist and anti-fascist movements in
15 modern day America” on April 4, 2019. I note that after the attack on reporter Andy Ngo discussed
16 above, Dr. Vysotsky penned an article in justification of Antifa violence entitled: “Antifa in
17 America: Militant Anti-fascism Isn’t Terrorism, It’s Self Defense”.⁸

18 42. Attached as Exhibit 8 is a true copy (albeit cropped) of a screenshot I captured off
19 Facebook reporting an event hosted by Cider Riot and “Rose City Antifa,” called a “May Day
20 Afterparty”. This was the event, discussed in detail below, that I came to protest, and forms the
21 core of allegations for which plaintiffs seek damages. According to newspaper reports, Cider Riot’s
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23

24 ⁷ Available at <https://www.portlandmercury.com/events/22469322/history-and-strategy-of-german-antifascism>.

25 ⁸ S. Vysotsky, *Haaretz*, July 3, 2019 (available at <https://www.haaretz.com/world-news/.premium-antifa-in-america-militant-anti-fascism-isn-t-terrorism-it-s-self-defense-1.7425726>).

1 association with Antifa continues, with the hosting of an event called “Antifa United Presents The
2 Life And Death of Marsha P. Johnson” on May 3, 2019.⁹

3 43. I have also observed T-Shirts advertising Cider Riot, posted online, which utilize the
4 Cider Riot logo as follows:



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10 44. While I do not know if Cider Riot expressly authorized this T-Shirt, I consider it to
11 be further evidence of the close association between the entity and Antifa.

12 45. Similarly, while I do not personally know plaintiff Abram Goldman-Armstrong, I
13 assume from his fostering of an ongoing relationship with Antifa, and hosting the events listed
14 above through his business, that he is supportive of their political views, and I have seen a
15 photograph of him wearing a hat emblazoned with a red hammer and sickle (the classic symbol of
16 the Soviet Union), over which a red skull is imposed:

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26 ⁹ Available at <https://www.portlandmercury.com/events/26376449/antifa-united-presents-the-death-and-life-of-marsha-p-johnson/>.



46. I understand that many may find the use of hammer and sickle insignia to be inoffensive, but to me it is the emblem of an evil ideology that has murdered hundreds of millions of innocents during the twentieth century; to me, it should be as socially unacceptable to wear a symbol like this as it would be to wear a swastika. The addition of the skull over the hammer and sickle to me underscores the violent socialist element represented by Antifa ideology.

47. As outlined above, I honestly and firmly believe that the political views and activity of defendants pose a danger to the future of this country, that it is entirely fair to call Cider Riot an “Antifa bar.” The conduct through which I and the LLC are accused of injuring plaintiffs consists, as set forth below, of no more than me exercising my First Amendment right to make these and other views known as effectively as I know how within the bounds of the law. This conduct was part of my overall campaign, as described above, to support law and order, fundamental constitutional rights, particularly the right of free speech, and to draw attention to the growing menace that Antifa poses to these rights and the Nation’s future.

Plaintiffs’ Allegations Concerning Specific Events Before May 1st

48. The first specific event about which plaintiffs complain is the claim that (1) the LLC “attempted to disrupt a meeting of the Democratic Socialists of America (DSA) on January 18,

1 2019; and that (2) on January 19, 2019, I attempted to violently trespass on the International
2 Workers of the World (IWW) Union Hall. (§ 13.) These accusations are false, and have nothing to
3 do with the operation of a cider bar by Mr. Goldman-Armstrong.

4 49. I have heard that a few individuals attempted to protest the DSA meeting on January
5 18, 2019, were asked to leave, and did so. I was not present on January 18, 2019, and neither I nor
6 the LLC organized that protest.

7 50. I heard afterwards that a large group of approximately thirty masked assailants then
8 attacked the protesters after they left, sending two of them to the hospital. I also heard that one of
9 the victims was black.

10 51. This was precisely the kind of conduct that, again, in my view, exemplifies the evil
11 nature of Antifa, and so I did determine to come and protest the IWW premises the next day,
12 Saturday, January 19, 2019, and did so, standing on the sidewalk in front of the premises. I did not
13 attempt to trespass on the premises, and never entered them.

14 52. I am aware that there was confrontation with a masked individual, believed to be
15 associated with Antifa, in the course of which he retreated into a store across the street, but the
16 notion that I “battered people on East Burnside” on this day, or directed others to do so, is fiction. I
17 did not touch the individual in question. Nor did I batter anyone from an “anarchist affinity group”
18 at a “‘March for Life’ anti-abortion rally”. There is a good deal of footage of me on the Internet
19 attending various public events, at which members of Antifa will frequently engage in offensive
20 physical contact with me, spit on me, or even strike me in an attempt to provoke me to violence; it
21 is my perception that my efforts to repel such contact or ward off blows are what plaintiffs, with
22 characteristic inversion of the truth, characterize as a “battery” to members of Antifa.

23 53. Plaintiffs allege that on January 24, 2019, the premises of plaintiff Cider Riot and
24 two other locations were vandalized with graffiti. Neither I nor the LLC did this, or directed others
25 to do so. Indeed, as plaintiffs allege (§ 16), I did publicly denounce the incident as a “false flag”
26

1 aimed at blackening my reputation, and that is what I think more probably than not did happen,
2 though I do not know for sure.

3 **The Events of May 1, 2019**

4 54. Plaintiffs allege that I spent time prior to arriving at the Cider Riot premises on May
5 1st “attempting to bait confrontations with demonstrators attending rallies and marches throughout
6 Portland”. (¶ 18.) I am aware that numerous Leftist groups take the occasion of May Day to
7 celebrate communism and attack America, and I believe it is important to call out this conduct as
8 un-American and dangerous to the Nation’s future, so I did spend much of the day walking around
9 downtown Portland with protestors.

10 55. I did not “batter” anyone while attending the downtown demonstrations. Rather, I
11 was physically attacked by an Antifa group who hit me in the face, dislodging my glasses, and stole
12 my hat. The group then further attempted to provoke me to respond violently by placing their hands
13 in front of my face and similar conduct. I did not respond to their provocations. The entire event
14 was recorded by Mr. Andy Ngo and posted on YouTube, and appears at approximately 1:39 to 2:24;
15 a true copy of this video, which I caused to be downloaded from YouTube from the address
16 authenticated by Mr. Ngo in his Declaration, is submitted herewith as Exhibit 9.¹⁰

17 56. As discussed above, I generally attempt to engage in dialog with those willing to
18 engage, and attempt to identify common ground and persuade them to see things differently. On
19 May 1, 2019, for example, one of the protestors standing with the Antifa crowd began to yell at me,
20 and I successfully persuaded him to step aside, and we engaged in a civil conversation and found
21 common ground. I was able to engage in the sort of dialog on several occasions during the day.

22 57. As noted above, the core event of this lawsuit, a visit to a May Day celebration by
23 Antifa at Cider Riot, was not an event I organized. I have no personal animosity toward plaintiff
24 Goldman-Armstrong or the other owners of plaintiff Cider Riot; I am only interested in the use of
25

26 ¹⁰ Also available at <https://www.youtube.com/watch?v=tb4KREvKYBA>.

1 the Cider Riot bar to provide a base and support for Antifa activities, and believe that plaintiffs'
2 doing so is a matter of significant public concern.

3 58. I had no plans in advance of May 1st to go to the Cider Riot premises, but received a
4 phone call from a friend that others were going to go there after the May Day demonstrations
5 downtown, and decided to go.

6 59. I believe it is fair to call my conduct confrontational, and certainly annoying to
7 members of Antifa, but I do not initiate violence against members of Antifa and did not initiate any
8 violence against any patrons of Cider Riot on May 1st. Nor do I think it fair to call my conduct
9 harassing or menacing. It was my goal on May 1st and in general to confront members of Antifa
10 with the truth, not to attack with abusive words or gestures.

11 60. To that end, I approached the premises carrying my cell phone and recording and
12 live-streaming the entire encounter through Facebook. A copy of the video livestream I filmed on
13 May 1st is submitted herewith as Exhibit 10.

14 61. As I arrived, I noticed that, as expected, the bar had a crowd of patrons sitting
15 outside that I would characterize as members of Antifa given the dark clothing and face masks. I
16 did not see anyone I would characterize as normal patrons not part of the Antifa event.

17 62. Plaintiffs allege that most of those arriving were "clad in armor and visibly carry
18 weapons". That is false. I was not clad in armor or carrying any weapons; I did observe one or two
19 protestors wearing helmets and carrying sticks. Given the violence of Antifa members, who
20 according to press accounts later gave a reporter, Andy Ngo, a brain injury by clubbing him on the
21 head, wearing helmets would be prudent for political opponents in the presence of Antifa crowds.

22 63. Before I had even crossed the street to get to the sidewalk in front of the bar, a
23 person dressed in black and wearing a mask left the premises and came out into the street. I
24 recognized the individual as one who had previously assaulted me, so I asked if he or she (it was
25 unclear which) was going to assault me again and was told I was not welcome. The individual
26

1 attempted to block me, making contact with my body, but I persisted toward the sidewalk adjacent
2 to the bar, pointing out that it was a public sidewalk, and asking the person to deescalate.

3 64. Arriving on the sidewalk, I filmed the crowd, stating that the premises were an
4 “Antifa bar” and asking anyone observing the live stream to take note of the various features of the
5 crowd, including all the people wearing masks. As part of my goal was to show the violent and
6 ugly nature of the Antifa members present, in response to their demands that I leave the area, I
7 dared them to do something. I did not use foul or abusive language in doing so.

8 65. I was not trying to start a fight, for I would not fight back. I have been punched to
9 the ground before by members of Antifa without making any violent response,¹¹ just as I was struck
10 earlier in the day and did not respond violently, and did not do so when repeatedly attacked on the
11 sidewalk and street outside Cider Riot on May 1st. The members of Antifa—and plaintiffs—know
12 that I pose no physical threat to them.

13 66. I was almost immediately spit upon, and I wiped it off on the persons who I thought
14 at the time had spit on me. With hindsight, I regret that, but there was no adverse reaction from the
15 person involved. The individual mentioned in paragraph 63 approached me again, and pushed me; I
16 asked him or her not to touch me, at which point another person on the sidewalk pulled down his or
17 her face covering, and the person who had pushed me knocked my phone to the ground. This is the
18 event characterized as me “battering” this individual (§ 21).

19 67. At this point, some of the people off to my right began to spray each other with
20 pepper spray. The patrons in the bar possessed large cans of bear spray, not the smaller concealable
21 cannisters a woman could put in her purse.

22 68. My review of several videos of the event causes me to believe that the pepper-
23 spraying began after an Antifa member standing on bar premises threw a drink at someone on the
24

25 ¹¹ For example, I entered an Antifa event in Berkeley, California, with my hands raised in a gesture
26 of surrender, and was attacked by a mob; I live-streamed the event, which I uploaded to YouTube
with additional footage that showed the events more clearly, it remains on line at
<https://youtu.be/R2q175aemII>.

1 sidewalk. I did not physically observe this at the time, but at approximately 8:41 in the YouTube
2 video of Mr. Noah Bucchi, one can see this; a true copy of this video, which I caused to be
3 downloaded from YouTube from the address authenticated by Mr. Bucchi in his Declaration, is
4 submitted herewith as Exhibit 11.

5 69. At this point, I remarked that there was now a riot at Cider Riot, and that the Antifa
6 members had taken the bait, meaning that they had responded to my presence, and the presence of
7 others, with violence, and had, as usual, initiated it.

8 70. I also yelled at the other people on the sidewalk not to throw anything, but to let
9 them be violent, remarking that those involved were violent and hateful, wearing masks, and
10 causing a riot. At no time did I pepper spray anyone, though I was repeatedly sprayed in the face
11 with pepper spray by patrons of the bar; I only responded by saying, in substance, look at how they
12 are acting. I also called the premises "Antifa central," noted that the premises were serving alcohol,
13 and urged viewers of the video to look up who was supporting this activity.

14 71. Members of the crowd on the premises repeatedly attempted to provoke me to
15 violence, screaming phrases like "let's go" and "go home, Nazis". I pointed out that the patrons
16 were the ones acting like Nazis, adding, in substance, that I was exercising my First Amendment
17 rights. They continued to pepper spray me. When asked why I was there, I responded: "to expose
18 you" and "to expose this".

19 72. The patrons continued to pepper spray me and others, ignoring my comment that I
20 was entitled to be on the sidewalk in front of the establishment. I asked why there was so much
21 hate present, and invited members of Antifa to come talk to me. As noted above, I had had success
22 with this approach in other circumstances.

23 73. An Antifa member also attacked a filmmaking student, who was filming the May
24 Day activities for a student project, damaging his camera. Looking at tapes afterwards, it appears
25 that this individual emerged from within the bar, attacked the student, and immediately returned to
26

1 the bar; plaintiff Goldman-Armstrong then prevented the student from following him in. By all
2 appearances, plaintiff Goldman-Armstrong acted to protect the attacker.

3 74. This is consistent with my understanding of the training received by Antifa members.
4 They are divided, for example, into yellow and red sections. The yellow section is most often seen
5 in public and is loud but seldom breaks the law; the red section hangs back, appears and does
6 something violent, and then retreats back into the crowd. Upon information and belief, plaintiffs
7 are involved in training Antifa members in techniques such as this at premises adjacent to the bar.

8 75. The Antifa members continued to pepper-spray me and others; I urged others to calm
9 down, to let the Antifa members display their nature. When the Antifa crowd accused me of being
10 aggressive, I correctly denied it, and asked if they were against aggression. They said they were not
11 against aggression, and continued to express aggression, by continuing to pepper-spray me until my
12 face turned red from the chemicals. I said that pepper-spraying was the behavior of Nazis, advising
13 them that I believed in the First Amendment, and that I would not dissuade them from attempting to
14 exercise their First Amendment rights.

15 76. I became apprehensive that the crowd was about to attack me and others, and
16 retreated off the sidewalk. At this point, the bar patrons advanced onto the street, and I observed
17 that an Antifa member and one of the other anti-Antifa demonstrators were engaged in a sparring
18 match with each other. Upon information and belief, the black-masked individual was in fact an
19 employee of Cider Riot.

20 77. I vigorously attempted to de-escalate the situation, stating that if the two participants
21 wanted to engage in mutual combat, other parties should put their weapons away and I forcefully
22 urged no one to intervene. My efforts were successful, and the two individuals sparred for a while,
23 ultimately shaking hands after the fight was over.

24 78. Plaintiffs allege that I “facilitated and refereed a street fight,” “dictat[ing] the rules,”
25 and “keep[ing] others from intervening”. I did not facilitate the fight, which started on its own
26 without any involvement by me. Rather, I responded to a threat of escalated violence by urging

1 others to stand down. I also observed that this was more appropriate conduct than “cheap-shotting”
2 people, by which I meant the practice of Antifa members of simply punching people without
3 warning.

4 79. After the fighting episode, I was ready to leave the area. I was pleased that the
5 Antifa crowd had not engaged in punching people in an underhanded and cowardly manner.
6 Unfortunately, the Antifa crowd continued to escalate the situation, which became a little chaotic,
7 and I attempted to calm down the other protestors, urging them to leave. At one point, I stepped
8 between one of the protestors and a female Antifa member who was trying to attack him.

9 80. Unfortunately, one of the other protestors then attacked this female Antifa member,
10 an event for which I immediately and repeatedly apologized. I became very angry with the attacker
11 and others who I felt had not behaved with restraint, and told them so, repeatedly shouting at them
12 to leave the area. I was very disappointed because up until then, the protest had, paradoxically,
13 ended up until then on a good note with the individuals shaking hands. Plaintiffs allege that the
14 attacker was my “associate”. I do not consider him an associate of mine, have no control over his
15 activities, and immediately condemned them when they occurred. I note that these events occurred
16 across the street from plaintiff Cider Riot.

17 81. At one point, I asked viewers, if they cared about Portland, to “take care of this
18 establishment” meaning that they should advise the Oregon Liquor Control Commission of the
19 improper management, and attempt to induce, through lawful means, regulatory measures that
20 would prevent Cider Riot from serving as a host for a violent and unlawful group. I have not
21 encouraged any false statements concerning Cider Riot. The truth of their support for a violent,
22 anti-American political group is more than enough.

23 82. I believe that within the crowd of masked individuals were one or more persons
24 hired by plaintiff Cider Riot LLC to provide security on the premises, and at no time during the
25 encounter did they (or anyone appearing to act on behalf of the bar) attempt to control the
26

misconduct of the patrons, which included not just pepper-spraying me and others, but also menacing me and others on the sidewalk with weapons, including brass knuckles.

83. While plaintiffs say they suffered business losses, they are required to comply with Oregon Liquor Control Board regulations, which I do not believe are consistent with permitting Cider Riot to host a large Antifa crowd wearing masks and carrying weapons, much less permitting them to attack onlookers. If plaintiff Cider Riot LLC suffered any lost business, which I doubt, it was caused for the most part by the large Antifa crowd of patrons wearing masks and spraying pepper spray onto those standing on the sidewalk, and engaging in other acts of violence.

84. I did post a list of what I understood to be the owners of Cider Riot on Facebook, including the publicly-available information from the Oregon Secretary of State. Again, I made no false statements and did not encourage others to make them; I wanted Americans to understand who was behind funding the Antifa group. In my opinion, this is First Amendment protected speech, and I do not violate the law by making publicly-available information available to the public.

85. My positions in this Declaration are consistent with numerous public statements I have made. I told Lars Larson during a radio interview that bars in Vancouver, Washington will not let patrons wear biker vests, because they do not want problems in the establishment, but Cider Riot is

“allowing people to come in with masks on, and . . . with weapons, batons, and this is in the middle of downtown Portland, and I don’t understand why people find this appropriate. . . For me, ‘cause they’re all communists, it’s just the same thing as if there were a bar that had a bunch of Nazis in it, you know; it’s insane to me, it’s unbelievable; Nazis who run around and just beat people up because they’re walking right by on the sidewalk.”


Mr. Larson then asked me: “I know there are people out there who are saying . . . if Joey Gibson and his people would just stick to themselves and don’t go to these public places, then there would be no trouble. What would you say to those people?” I responded that that would be “ridiculous, because they’re going to continue to grow, and it’s going to embolden them . . .”.

86. I am convinced that unless members of the public step forward to protest Antifa activities, those activities will continue to increase in strength. Indeed, it has been said that the only thing necessary for the triumph of evil is for good men to do nothing. I am not perfect, but I consider myself a good man, stepping forward to do something about a rising evil in this Nation rather than doing nothing.

87. I believe that the true purpose of the lawsuit is to advance the political aims of Mr. Goldman-Armstrong and his Antifa associates, rather than to compensate for any imagined loss of business income, and to silence efforts to draw attention to Antifa activities in Portland.

I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand they are made for use as evidence in court and are subject to penalty for perjury.

Dated this 22nd day of July, 2019.


Jocy Gibson



Rose City Antifa

July 5 at 2:57 PM

And it's about time. There is virtually no chance the Conservatards will hold the majority in Congress at the Mid-terms. That means the fundamental transformation can continue and the momentum of the Democratic-Socialist movement is poised to impeach Donald Trump. Rest assured, we will be at polling locations across Amerikkka enforcing and pushing back. The Dekkklaration and the Constitution will soon be relics of the past, just like the statues of the racist Generals throughout the Racist States.

[The following text is a dense, handwritten-style transcription of a document, likely the Declaration of Independence, with many corrections and additions in a different script. It is too blurry to transcribe accurately but appears to be a modified version of the original text.]

M.WASHINGTONTIMES.COM

Facebook flags Declaration of Independence as hate speech

In the week of America's Independence Day, the algorithms of Facebook...



EXHIBIT

PAGE 1 OF 1



Rose City Antifa

July 5 at 1:33 PM · 🌐

Inspiring photographs of our brothers sisters and others, today they call us the enemy, tomorrow we will be the police force they bow to and we will enforce the tenants of our Democratic Socialist society by any means necessary.

"They'll tell you you're too loud, that you need to wait your turn and ask the right people for permission. Do it anyway."

Alexandria Ocasio-Cortez





Rose City Antifa

July 14 at 7:07 PM · 🌐

...

#DemocraticSocialists #Anarchy





Patriot Prayer

@PatriotPrayerUSA

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JUL
14

Rally for Freedom in Battle Ground

Tomorrow 2 PM · Shared to Columbia County Republic...

Keweenaw Park

Battle Ground, WA

Get Tickets

Interested

AUG
10

Second Amendment Rally & Patriot Prayer P...

Sat 3 PM · 2 friends are going

Coos Bay Boardwalk

Coos Bay

Interested

Past Events

JUN
29

God and Freedom Rally

Sat 2 PM · 215 guests

Klickitat Court House Washin..

Goldendale, WA

JUN
29

Klickitat- We Will Not Comply

Sat 2 PM · 150 guests

Klickitat Court House Washin..

Goldendale, WA

JUN
9

Cowlitz Blue Line 2 mile march

Sun 2 PM · 446 guests

Louisiana st & 16th ave

JUN
4

WOU Republicans are Hosting Joey Gibson

Tue 4:30 PM · Shared to Oregon Women for Trump (O...

Patriot Prayer

JUN
1

Tri-Cities God and Freedom Rally

Sat 2 PM · 553 guests

Howard Aron Park

Richland, WA

MAY
29

Morton, Wa 2nd amendment city council

Wed 7 PM · 60 guests

Bob Lyle Community Center...

MAY
19

Lewis County 2nd amendment rally

Sun 1 PM · 305 guests

Gus Backstrom City Park

Morton, WA

MAY
11

Pro-Life rally for the innocent in NY

Sat 1 PM EDT · 570 guests

West Capitol Park, Albany

MAY
6

Battle Ground City Council for the 2nd amen...

Mon 7 PM · 73 guests

105 SW 1st St, Battle Ground...

APR
29

Billy Wilson court date rally.

Mon 12 PM · 142 guests

Clark County Courthouse

Vancouver, WA

Flash Flag Wave for DeRosier's Family

Joey Gibson
4702 Evergreen Blvd, Vanc...

EXHIBIT

4

PAGE

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OF 5

APR 24	Wed 10 AM - 110 guests	
APR 15	2nd amendment: Woodland City Council Mon 6:30 PM - 135 guests	200 E. Scott, Woodland, WA
APR 13	Woodland: Sanctuary City 2nd amendment Sat 1 PM - 250 guests	1010 Atlantic Ave, Woodland...
APR 6	Kititas County Lincoln Pre-Dinner Gun right... Sat 5:30 PM - 33 guests	700 N Poplar St, Ellensburg...
APR 5	CWU College freedom weekend party Apr 5 - Apr 6 - 220 guests	West entrance to Black hell o...
APR 1	2nd amendment: Battle Ground City Council Mon 7 PM - 100 guests	109 SW 1st St, Battle Groun
MAR 31	March: Battle Ground 2nd amendment sanct... Mar 10 - Mar 31 - 593 guests	Kwanas Park Battle Ground, WA
MAR 28	Battle Ground City Hall for the 1st amendment Thu 4 PM - 55 guests	City of Battle Ground, Washi... Battle Ground, WA
MAR 23	Patriot Prayer bus party to the Salem rally:... Sat 10:30 AM - 75 guests	Parking lot at Columbia way
MAR 18	2nd amendment: Camas City Council Mon 7 PM - Shared to NorthWest Trump Alliance for Ch...	516 NE 4th Ave Camas, WA...
MAR 14	2nd amendment: Ridgefield City Council Thu 6:30 PM - Shared to NorthWest Trump Alliance for...	510 Pioneer St, Ridgefield...
MAR 13	2nd amendment: La Center City Council Wed 6:30 PM - 197 guests	214 E 4th St, La Center, WA...
MAR 5	Free Billy Wilson: Clark County Council Mee... Tue 6 PM - 100 guests	1300 Frankan St, Vancouver
MAR 4	2nd amendment: Battle Ground City Council Mon 7 PM - 515 guests	109 SW 1st St, Battle Groun
MAR 2	Free Billy Wilson Rally Sat 1 PM - 305 guests	Clark County Courthouse Vancouver, WA
FEB 25	Enforce the 2nd amendment: Washougal Cit... Mon 7 PM - 311 guests	1701 C St, Washougal, WA...
FEB 24	Enforce the 2nd amendment: Washougal-Li... Sun 5 PM - 646 guests	Unitless LLC Washougal, WA
FEB 23	Joey Gibson and the Three Percent of Wash... Sat 6 PM - 582 guests	Gowen 301 Seattle, WA
FEB 23	Enforce 2nd Amendment: North Clark Count... Sat 12 PM - 580 guests	Horseence Lake (Washington) Woodland, WA
FEB 19	Thurston County - 2A Sanctuary Ordinance Tue 1:45 PM - 384 guests	Thurston County of - Countho... Olympia, WA
	Enforce the 2nd Amendment: Island County	 Joey Gibson 785 Wynn Rd, Greenbank...


EXHIBIT

4

PAGE 2 OF 5

FFB 2	Sat 3 PM - 851 guests	
JAN 29	Pierce County - 2A Sanctuary Ordinance Tue 2:50 PM - 749 guests	930 Tacoma Ave S, Room 1
JAN 28	Lewis County - 2A Sanctuary Ordinance Mon 9:45 AM - 170 guests	351 NW North Street, 98522
JAN 22	Klickitat County: enforce the 2nd amendment Tue 11 AM - 55 guests	400 E. Sprink Dr, The Dalles, ...
JAN 20	Cowlitz County: enforce the 2nd amendment Sun 1 PM - 375 guests	301 Academy St. Kelso, WA
JAN 13	Demand 2nd Amendment Ordinances Now Sun 10 AM - 94 guests	2388 Centerville Hwy, Cente...
JAN 12	Demand 2nd Amendment Ordinances Now Sat 10 AM - Shared to Rural Oregon Patriots	710 SW Rock Creek Dr, Stev...
DEC 22	Jesus March Sat 12 PM - 302 guests	Vancouver Landing Amphith... Vancouver, WA
DEC 18	Skamania County: Protect the 2nd amendm... Tue 9 AM - 245 guests	Skamania County District Co...
DEC 8	Skamania: Constitutional sanctuary county Sat 10 AM - 505 guests	710 SW Rock Creek Dr, Stev...
NOV 9	Grays Harbor College: Patriot Prayer rally Fri 2 PM - 48 guests	Grays Harbor College Aberdeen, WA
NOV 9	Centralia College: Patriot Prayer rally Fri 10 AM - 60 guests	Centralia College Centralia, WA
NOV 3	Pray for Planned Parenthood Sat 10 AM - 185 guests	2001 E. Madison St. Seattle
NOV 2	University of Washington: 2nd amendment Fri 3 PM - 290 guests	Red Square at UW Seattle, WA
NOV 2	Lower Columbia College: 2nd amendment Fri 10 AM - 283 guests	1500 Maple St. Longview, W
OCT 24	Clark College: NO 1-1639 rally Wed 12 PM - 237 guests	Patriot Prayer
OCT 23	WSU Vancouver: Oppose fascist gun laws Tue 12 PM - 251 guests	WSU Vancouver Vancouver, WA
OCT 22	Clark College: Oppose fascist gun laws Mon 12 PM - Shared to Oregon Republican League	Clark College - Vancouver, ... Vancouver, WA
OCT 13	Flash march for Law and Order in PDX Sat 6 PM - Shared to Rural Oregon Patriots	Nordstrom Downtown Portland Portland
SEP 22	Free Alex Jones Rally Sat 1 PM CDT - 1,557 guests	Woodridge Park Austin, TX
	Gibson For Senate Freedom March	



AUG 4	Sat 12 PM - Shared to The Hero of Patrick Henry Nat...	Portland
JUN 30	Freedom & Courage Rally Sat 4 PM - Shared to Rural Oregon Patriots	Terry D. Schunk Plaza Portland
JUN 9	Defund Planned Parenthood Sat 12 PM - 171 guests	Planned Parenthood Kent, WA
JUN 3	Tiny's Freedom March Sun 5 PM - 381 guests	Terry D. Schunk Plaza Portland
MAY 20	Seattle Open Carry March Sun 3 PM - 247 guests	Stewart St & Westlake Ave
MAY 20	Seattle Open Carry March Sun 3 PM - 1,661 guests	Westlake Ave & Stewart St.
MAY 1	May Day support Proud Boys Tue 3 PM - 92 guests	Westlake Park Seattle, WA
MAR 25	Freedom First Rally Sun 2 PM - 294 guests	Centerplace Regional Event ... Spokane Valley, WA
MAR 24	Meet Joey Gibson Sat 11 AM - 204 guests	815 George Washington Wy...
FEB 25	Indoor Freedom Rally Major Announcement Sun 5 PM - Shared to NorthWest Trump Alliance for Ch...	Red Cross Building At The H... Vancouver, WA
FEB 10	Freedom Rally at Univ of Washington Sat 1 PM - 835 guests	Red Square at UW Seattle, WA
FEB 9	Stand Up For Free Speech And People's Rig... Fri 9 AM - 72 guests	Planned Parenthood Olympia, WA
JAN 20	Night Time Freedom March Sat 5 PM - 477 guests	Salmon Street Fountain Portland
JAN 20	Patriot March - San Francisco (counter actio... Sat 12 PM - Joey Gibson went	Civic Center Plaza, San Fran... San Francisco, CA
JAN 20	Patriot Prayer Going To Women's march Sat 10 AM - 400 guests	Cal Anderson Park Seattle, WA
DEC 23	March for Jesus Sat 1 PM - 3 friends went	Salmon Street Fountain Portland
DEC 12	NW stands against Hillary. Tue 6 PM - 2 friends went	Ariene Schnitzer Concert Hall Portland
DEC 9	March for Kate Steinle Portland Sat 1 PM - Shared to Rural Oregon Patriots	Terry D. Schunk Plaza Portland
NOV 11	Freedom March Berkeley Sat 2 PM - Joey Gibson went	People's Park (Berkeley) Berkeley, CA
OCT 15	Support the American Flag Sun 2 PM - Shared to Rural Oregon Patriots	Oregon State Capitol Salem
	Peaceful Vancouver Freedom March	 Joey Gibson 110 Columbia St, Vancouver

SEP 10	Sun 2 PM UTC+08 · Shared to Republican Liberty Caucus...	
AUG 26	News Conference Sat 7 PM · 3 friends went	Alamo Square, San Francisco San Francisco, CA
AUG 13	Freedom Rally Seattle Sun 2 PM · 3 friends went	Westlake Park Seattle, WA
AUG 6	Freedom March Sun 2 PM · 5 friends went	Salmon Street Fountain Portland
JUN 30	Freedom March Fri 5 PM · 3 friends went	Salmon Street Fountain Portland
JUN 15	Free Speech Evergreen State College Thu 5:30 PM · 2 friends went	The Evergreen State College Olympia, WA
JUN 4	Trump Free Speech Rally Portland Sun 2 PM · 9 friends went	Terry D. Schunk Plaza Portland
MAY 13	Antifa Watch Sat 2 PM · Joey Gibson went	Chapman Square Portland
MAY 11	Antifa WATCH Thu 4:20 PM · Shared to NorthWest Trump Alliance for...	600 SE 140th Ave, Portland, OR
MAY 6	Olympia stands against Antifa Sat 4 PM · Shared to NorthWest Trump Alliance for Ch...	2605 Washington St SE, Oly...
MAY 1	Stand Against Communism Mon 4 PM · Joey Gibson went	401 Pine St, Seattle, WA 981...
APR 29	March for Free Speech 82nd ave Sat 10 AM · 4 friends went	Montavilla City Park Portland
APR 2	Rally for Trump and Freedom Sun 1 PM · 6 friends went	Patriot Prayer

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Elizabeth Hovde: The misunderstood Joey Gibson

Posted Oct 28, 2018

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By Elizabeth Hovde | For The Oregonian/OregonLive

"We're here to talk to students," Joey Gibson told me Tuesday before his Patriot Prayer rally at Washington State University Vancouver. And that's exactly what he did.

For two hours, I watched challenging, inquisitive, respectful conversations happening on the campus plaza between people of different political persuasions. Instead of the violence predicted, Gibson brought something we need more of: talk that leads to increased understanding about opposing thoughts and the people behind them. It was the kind of conversation that helps people find common ground. (Disclosure: I'm a WSUV adjunct professor who had a lot of interest in seeing how things went down on campus.)



Travel Solo, Make Friends

Traveling alone can be lonely. Here's how to connect safely on your solo trips.

1

AD The New York Times

There was zero violence at the rally, as no groups showed up to offer it. Just in case, 15 Clark County sheriff's deputies were there alongside campus police. I saw a Washington State Patrol trooper, as well. The deputies I spoke with before the rally were comfortable with the situation and told me they felt very supported in their law-keeping efforts. "That's why we work over here," one Clark County deputy said.

Contrast that with what has occurred at recent protests in Portland. The violence there prompted Daryl Turner, the president of the Portland police union, to call on Portland City Council members "to quit sitting on their hands," decry violence, hold people accountable and "support our officers when we act to preserve public safety."

Turner also wrote in a recent Facebook post, "Our officers and our community face those who believe they can harass, assault and victimize Portlanders at will with no threat of arrest, indictment or conviction." After discussing the balance needed for protecting free speech and ensuring safety, Turner called the city out for a "culture of enablement" that's partly responsible for putting Portland in national headlines.

Mayor Ted Wheeler and the Portland City Council need to make it clear that Portland's streets are not open for takeovers and violent behavior. Free speech can happen without hijacking other citizens' ability to move about safely.



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AD The New York Times

The Patriot Prayer rallies in Vancouver this week were refreshing and productive, even if not well-attended. At Tuesday's rally, I counted about 100 people, a mix of curious students, supporters, media and the police. That's not surprising. Antifa didn't show. Concerned about students' safety, the university's chancellor and

some professors advised students to ignore the speakers and avoid the event. It was left up to individual professors whether to hold class that day, and some canceled.

During the question-and-answer time Gibson facilitated, there was disagreement about Initiative 1639, a gun-control proposal on Washington state's ballot. Some, like the Patriots, think its passage -- and storage guidelines it would require -- would undermine the ability to have guns in homes for self-defense. Supporters of the initiative said that any effort to prevent gun violence should overrule concerns.

Everyone I talked to, however, agreed that the rally itself was tame and respectful. Student Julianna Christian said concern about Patriot Prayer "was blown out of proportion" and much of it biased. She said the warnings and worry made campus "a ghost town."

"The guy who walked up to us and gave us information was super nice," student



Travel Solo, Make Friends

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AD The New York Times

Agnes Moldovan told me. "I thought it'd be crazy. But it was just a good conversation."

A.J. Alonzo, a former student of mine who had been in the area of a recent Portland protest, was at the WSU rally. He echoed Union President Turner's concerns about police protection in Portland.

Contrary to what Alonzo had been told to expect, he said he didn't see or hear a message of white supremacy or racism. "Students were asking why there would be

white supremacists on campus." He shook his head and exclaimed, "This is a protest about gun rights!" Patriot Prayer, by the way, is led by guys who aren't white, and there wasn't a racist word in the leaders' speeches on Tuesday. Quite the opposite, in fact.

Connecting and having conversations -- even with racists that Gibson says he disagrees with -- is a main practice of Gibson's and one he talked about at length Tuesday. You have a better chance of changing someone's opinion that way, Patriot Prayer leaders argued.

If more regulations aren't the answer to address a violent society, asked one student, what is? In his answer, Gibson sounded like a modern-day prophet. "The answer is spiritual," he said.

Those words echoed his earlier speech. He said that for himself, freedom was second only to God. "The reason I do what I do is I believe in God. I believe in Jesus, and I believe he is the answer to some of the biggest problems that we have in this country."



Gibson didn't look like the harasser and violent bully I've been reading about, even if he attracts white nationalists and violent counter-protesters. I'll keep watching, but¹ I think he's far more unique in this region: Gibson has unpopular thoughts about freedom, guns, abortion and spirituality, and he voices them on a public stage.

Before the rally, students made signs and wrote words like "love" and "unity" in chalk where Gibson would appear. Much of the political activist's talk incorporated that message. He was standing on a lot of common ground.

Elizabeth Hovde's column appears on the fourth Sunday of the month.

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OREGON LIQUOR CONTROL COMMISSION INTAKE/COMPLIANCE ACTION REPORT

CASE #:

1. PREMISES #: 55708	7. RECEIVED BY: S. Pitton	DATE: 01/24/18
2. LICENSEE: Cider Riot LLC	8. COMPLAINANT: PPB#18-22582 & #18-23115	
3. TRADENAME: Cider Riot	9. ADDRESS:	
4. ADDRESS: 807 NE Couch St.	10. CITY/ZIP:	
5. CITY/ZIP: Portland, 97214	11. PHONE:	
6. PHONE: 503-662-8275	12. ASSIGNED TO: S. Pitton	DATE: 01/24/18

13. ALLEGED VIOLATIONS:

<input type="checkbox"/> Minors	<input type="checkbox"/> Service Permits	<input type="checkbox"/> Financial Assistance
<input type="checkbox"/> VIPs	<input type="checkbox"/> Unlawful Activity	<input type="checkbox"/> Food Service
<input checked="" type="checkbox"/> Disorder	<input type="checkbox"/> Unauthorized Interest	<input checked="" type="checkbox"/> Other:
<input type="checkbox"/> Neighborhood Livability	<input type="checkbox"/> Drinking on Duty	<input type="checkbox"/> Other:

On 1/24/2018 I reviewed PPB #18-22582 & #18-23115. On 1/20/18 Police reported being called to the area of 8th and NE Couch St. on a fight. Officers contacted one person who had been assaulted. He denied wanting to press charges, but said the fight started outside Cider Riot premises #55708. Later Police responded to Providence Hospital where another person was claiming to have been assaulted. The two incidents stemmed from the same fight. The same date, I spoke with Licensee Abram Goldman-Armstrong. He said he was holding a political event following a protest in downtown Portland. A group of patrons were outside in the "patio" area when an unknown person began to heckle them and make political comments. The heckler was not a patron and was standing in the street when the two patrons from left the licensed area and engaged the heckler. Goldman-Armstrong said a fight ensued and after several minutes the heckler ran off, but both patrons were injured. The police were called and one of the patrons filed a report but the other left and was taken to the hospital. Goldman-Armstrong denied having video coverage of the area, again pointing out the fight occurred in the street. He also pointed out that he did not have security for the event and pointed out that in the future security will be present. Goldman-Armstrong was cautioned about evicting both parties in such altercations, and on the need to safeguard patrons at such events to prevent disorder from occurring on or near the premises.

15. COMPLAINANT REQUESTS CONTACT:	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
16. ASSESSMENT:	<input checked="" type="checkbox"/>	Open Investigation	<input type="checkbox"/>	Add to Open Investigation
17. CONCLUSION:	<input type="checkbox"/>	Proven	<input checked="" type="checkbox"/>	Unproven
18. STATUS:	<input checked="" type="checkbox"/>	Closed	<input type="checkbox"/>	Continued
19. ACTION:	<input checked="" type="checkbox"/>	Verbal Instruction	<input type="checkbox"/>	Refer to AP&P
<input checked="" type="checkbox"/>	Other: Education provided			
20. CONTACT PERSON: Licensee Abram Goldman-Armstrong SP#491198 EXP:3/20				DATE: 01/24/18
<input checked="" type="checkbox"/>	In Person	<input type="checkbox"/>	Telephone	<input type="checkbox"/> Other:
21. SPECIFIC LAWS REFERENCED: OAR 845-006-0347(2) Permitted Disorderly Activity, OAR 845-006-0347(4) Fail To Evict.				

INSPECTOR: S. Pitton	DPSST #: 14159	DATE: 01/24/18
APPROVED BY:	EXHIBIT <u>6</u>	DATE: <u>020118</u>

ALL WORKED UP
WARTRIBE
BERATOR
RUINED IT
SIDEWALK SLAM

THE PROWLERS
VIOLENT TRADITIONS
LOADB
CLAYMORE
SKULK

SUNDAY **JANUARY 25TH-27TH**

SOUL AND REGGAE ALLDAYER WITH:
D ROCK SMALL AXE SOUNDSYSTEM PDX
QUEEN CITY SOUL CLUB (CINCINNATI)
JET CITY SOUND SYSTEM (SEATTLE)
LEFT OF THE DIAL (OAKLAND)
IMPACT SOUND SYSTEM (PDX)
DJ JAMEY B

\$10 AT THE DOOR
NO ONE WILL BE TURNED AWAY
FOR LACK OF FUNDS!!
CIDER RIOT!
807 NE Couch St.
Portland, OR 97232

BENEFIT FOR THE INTERNATIONAL
ANTI-FASCIST DEFENSE FUND
FRI-SAT 5PM-12AM

JAN
25

Rock Against Fascism PDX

Public · Hosted by RASH Northwest and Cider Riot

★ Interested ✓ Going

Jan 25 at 4 PM – Jan 27 at 12 PM
about 3 months ago

Cider Riot
807 NE Couch St. Portland, Oregon 97232

Show Map

About

Discussion

Details

Rock Against Fascism PDX is our fourth benefit event for the The International Anti-Fascist Defense Fund. After the massive success of our last four we have decided to do a full weekend this time with bands and DJs from all over North America.

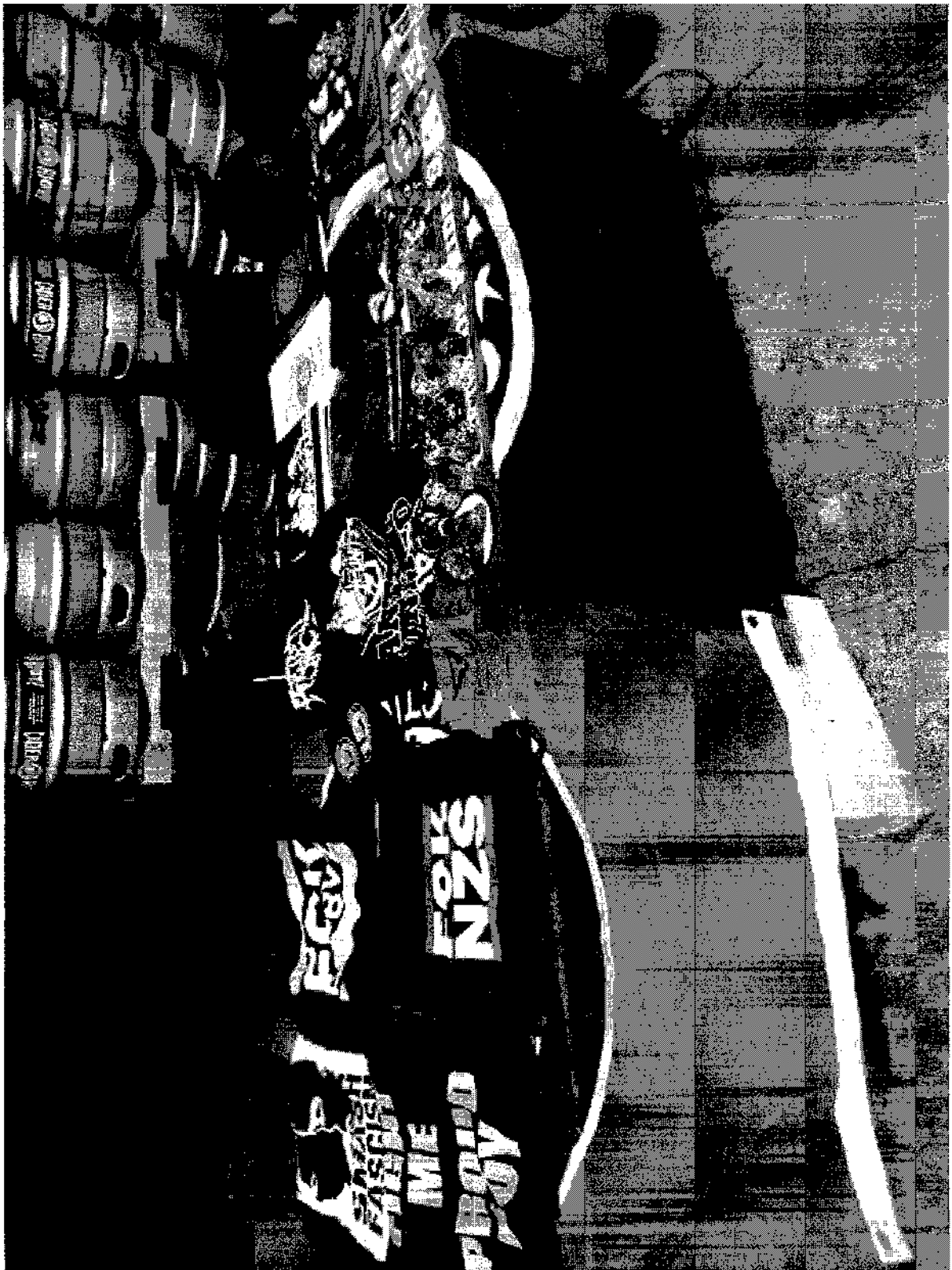
Come have fun and raise money for a good cause

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Public · Hosted by Rose City Antifa and Cider Riot

✓ Going

[Show Map](#)

Discussion


DJs: Dark Entries & Soul Survivor



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EXHIBIT 9

(Filed Conventionally)



Declaration of Joseph Gibson in
Support of Special Motion to Strike
Exhibits 9, 10, & 11.

EXHIBIT 10

(Filed Conventionally)



EXHIBIT 11

(Filed Conventionally)



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CERTIFICATE OF SERVICE

I, Carole A. Caldwell, hereby declare under penalty of perjury under the laws of the State of Oregon that the following facts are true and correct:

I am a citizen of the United States, over the age of 18 years, and not a party to or interested in the within entitled cause. I am an employee of Murphy & Buchal LLP and my business address is P.O. Box 86620, Portland, Oregon 97286..

On April 21, 2021, I caused the following document to be served:

DECLARATION OF JOSEPH OWAN GIBSON IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS FOR SELECTIVE PROSECUTION

in the following manner on the parties listed below:

Brad Kalbaugh	()	(BY FIRST CLASS US MAIL)
Multnomah County District Attorney's Office	(X)	(BY E-MAIL)
600 Multnomah County Courthouse	()	(BY FAX)
1021 SW 4th Ave	()	(BY HAND)
Portland OR 97204	(X)	(E-Service, UTCR 21.100)
E-mail: brad.kalbaugh@mcdca.us		

/s/ Carole Caldwell