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ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco
10/05/2018
Clerk of the Court
BY: VANESSA WU
Deputy Clerk

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

*In the Matter of the Subpoena Issued to
Weebly in:*

BETHANY SHERMAN, an individual,
and OG ANALYTICAL, an Oregon
limited liability company,
Plaintiffs,

vs.

DOES 1 through 10, inclusive,

Defendants.

Case No. CGC-18-569429

**DECLARATION OF COUNSEL,
COOPER BRINSON**

DATE: November 9, 2018

TIME: 9:00a.m.

DEPT: 302

1. My name is Cooper Brinson. I am lead counsel for John/Jane Doe(s) in opposing the subpoena that Bethany Sherman and OG Analytical served on Weebly, Inc. seeking Doe(s) identifying information. This declaration may use the pronoun she/her to refer to Doe(s) but this does not in any way imply the actual gender identity or sex of Doe(s).

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2. I became aware of the subpoena at issue when Doe contacted our office seeking assistance with the above captioned case. Doe sent a copy of the complaint and subpoena to our firm via email.

3. Doe also included the email to Doe's email address that Doe received from Weebly notified Doe of the subpoena.

4. I responded to the email and requested that Doe come to our office to verify that she is the individual that created the Weebly account for <https://eugeneantifa.weebly.com> (the "website").

5. Doe came to my office and logged into an account that verified that she is the individual that registered the website.

6. Attached hereto as Exhibit A, is a true and correct copy (web archive) of the article posted on November 23, 2017 at <https://eugeneantifa.weebly.com/home/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood>.

7. Attached hereto as Exhibit B, is a true and correct copy of the subpoena duces tecum sent to Weebly, Inc.

8. Attached hereto as Exhibit C, is a true and correct copy of the results of the "business name search" from the Oregon Secretary of State's website, noting Plaintiffs address.

I declare, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct. Executed this 2nd day of October, 2018 in Eugene, Oregon.


By: 
COOPER BRINSON
Attorney for Movant Doe(s)

Exhibit A

INTERNET ARCHIVE

Wayback Machine

(/web/)

http://eugeneantifa.weebly.com/home/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood

https://eugeneantifa.weebly.com/home/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood

MENU

8 captures (/web/*/https://eugeneantifa.weebly.com/home/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood) (/web/201507010000... the-nazis-in-your-neighbo... 5 Dec 2017 - 21 Aug 2018

EUGENE ANTIFA

Introducing Mr. & Mrs. Blackhat: The Nazis in Your Neighborhood (//web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood)

11/23/2017

0 Comments

(//web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood#comments)

Anti-fascist activists from Eugene Antifa, Rose City Antifa, and Pacific Northwest Anti-Fascist Workers Collective have been able to get access to the logs of a Discord server used by a variety of Pacific Northwest fascists and white supremacists, given the tongue-in-cheek name, the Cascadian Coffee Company (CCC). Discord is a chat app, originally developed for online gaming, but often used by the far-right and white supremacists groups to organize their groups and events. These logs contain thousands of messages detailing activities, organizing, and interactions of one particular bunch in the region. In an ongoing series of articles, the coordinating anti-fascist groups will publish revealing information about this particular set of Nazis organizing throughout the Pacific Northwest region, located from Ashland to Seattle. You can follow all of these stories by visiting our blog

Eugene Antifa

Sometimes antisocial, always antifascist.

Fund the struggle
(https://web.archive.org/web/20180103064223/https://fundrazr.com/f11h9c?ref=sh_3SyXVSPtkQb3SyXVSPtkQb)

Archives

October 2017

(/web/20180103064223/September 2017)

(https://eugeneantifa.weebly.com/home/archives/10-2017)

(<https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/>), following us on Twitter (<https://web.archive.org/web/20180103064223/https://twitter.com/eugeneantifa>) or Mastodon (<https://web.archive.org/web/20180103064223/https://anticapitalist.party/@eugeneantifa>), and using the hashtag #PNWfascistlogs and #CCC.

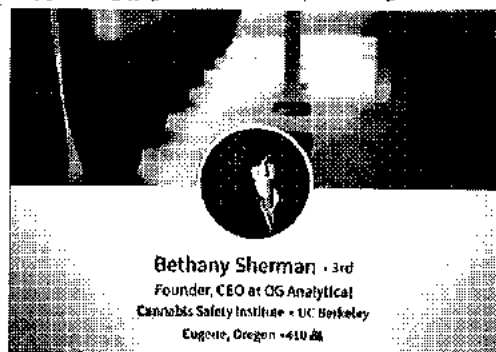
Update (12/25/17): Since the publication of this article, further research has revealed that **Matthew Combs** is a multiple felon who has a lengthy criminal record which includes the conviction of a felon in possession of a firearm and harassment. He has also been charged with sexual abuse and contributing to the sexual delinquency of a minor. Combs and Sherman have both come public with their white supremacist ideology and can now be found on Twitter at @doxedMLC and @OG_Bethany. We continue to urge consumers to boycott dispensaries that sell cannabis products that have been tested by OG Analytical after December 5, 2017 (the date the public became aware of Combs and Sherman's neo-Nazi activities).

Not every Nazi carves a swastika into the middle of their forehead; in fact, some Nazis may blend in with the rest of the community: they may be your employer, a regular customer who buys his morning coffee at the corner natural health foods store, a parent who frequents the nearby public park with their child, a casual acquaintance, an old roommate, your pot dealer, or even your neighbor. Let us introduce to you: Mr. and Mrs. Blackhat.

<https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/uploads/1/0/6/3/106>



Matthew Lee Combs

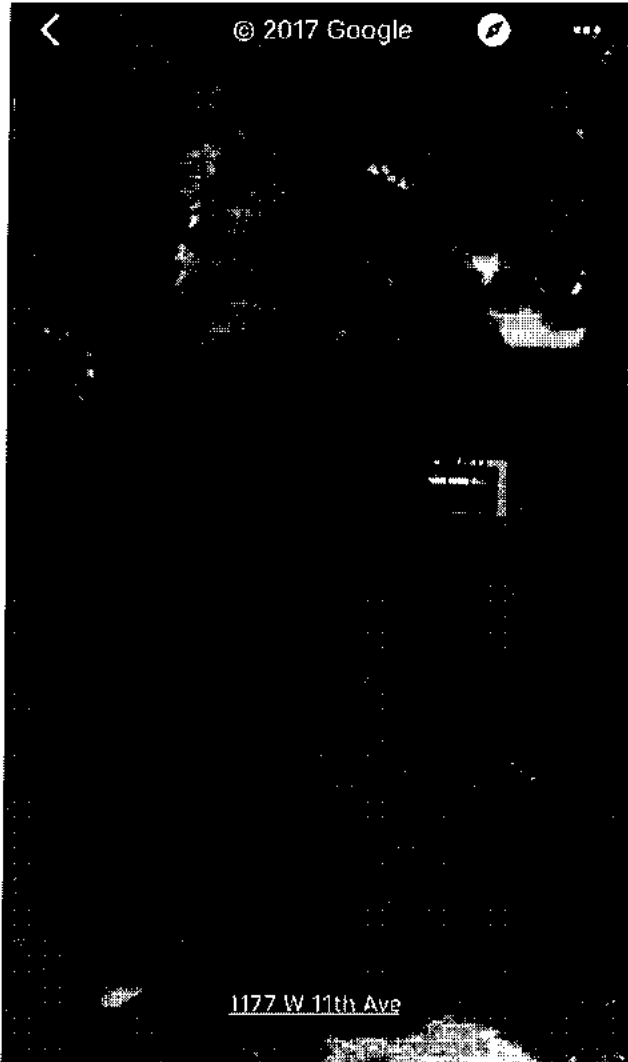


Born on **November 28, 1978**, **Matthew Lee Combs** is originally from Roseburg, Oregon, and lived in Ashland until about 2013, when he moved up to Eugene and shacked up with his girlfriend. He currently lives with his pregnant girlfriend, **Bethany Sherman**, and their 11/2 year old daughter at **1177 West 11th Avenue** in Eugene. Until now, Combs has operated fairly anonymously to the public eye as a neo-Nazi. He serves as Jimmy Marr's left hand man and Jake Laskey's right hand man; most notably, Matthew Combs is the American Patriots Brigade (APB) organizer, a support group for the neo-Nazi gang American Front (AF).

Bethany Marie Sherman, Combs's girlfriend, while not a participant in the Cascadian Coffee Company (CCC) Discord herself, is described within it as sharing Combs's extremist views, and consistently, materially supporting his work with the CCC members, American Patriots Brigade (APB), and other PNW regional fascists by making Nazi stickers, supplying food, attending neo-Nazi social gatherings, and "red-pilling" other Discord users' girlfriends,

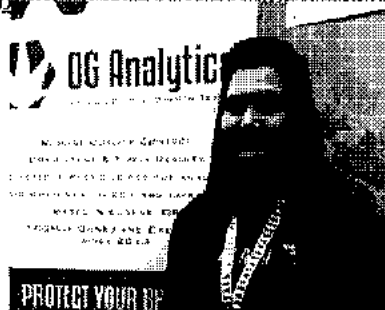
June 2017
<https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/arc>
 May 2017
 Categories
[https://web/20180103064223](https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/arc)
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[hives/06-2017](https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/arc)
[hives/05-2017](https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/arc)
[weebly.com/home/cat](https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/arc)
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among other things. As "Mrs. Blackhat," Bethany runs her own white supremacist Twitter account under the handle @14th_word, with which she participates in private, group fascist chats and retweets her boyfriend's white supremacist tweets, as well as other racist Twitter accounts. In her everyday "normie" life, Bethany Sherman is the CEO of OG Analytical, a state accredited cannabis testing company, and maintains a significant presence within prominent cannabis industry and regulation circles in Oregon.



Mr. and Mrs. Blackhat's residence 1177 West 11th Avenue, Eugene, Oregon 97402 (House owned by Bethany Sherman)

<https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood>

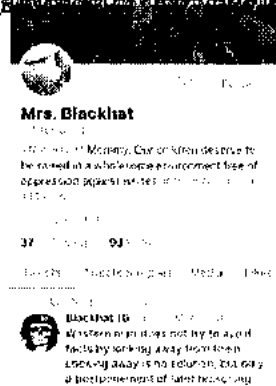
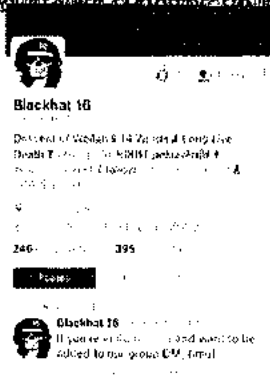




Matthew Lee Combs is pictured above with identifying tattoos that are also visible in a photo he posts of himself in the CCC Discord logs. Together, with the information revealed in the leaked logs and the anonymous tips we have received about him, we have been able to successfully identify him to our community.

He can be found on Twitter where he uses the handle @basedMLC and tweets out neo-Nazi, white nationalist, and derogatory tweets. Until recently, he has been known as "Blackhat16," but he has since changed his username to an odal rune symbol. It is common practice for modern day Nazis to use the symbol of an odal rune to replace the somewhat less socially acceptable swastika. Matthew is the Eugene, Oregon organizer for the American Patriots Brigade, an American Front support group. The number "16" in "Blackhat16" is numerology code for the neo-Nazi group American Front (headed by Creswell resident Jake Laskey), where 1=A and 6=F representing AF, or American Front.

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Matt Combs joined Jimmy Marr and numerous other neo-Nazis (who are also Cascadian Coffee Company Discord users) on April 24, 2017, in what can only be described as a Holocaust denial demonstration. At the event, which took place in front of Jimmy and Judy Marr's residence at 1321 G Street in Springfield, Oregon, Matt Combs wears a balaclava and a green flight jacket with American Patriots Brigade and American Front Support 16 patches. He is seen armed with a mini baseball bat and a high powered laser. Combs feels quite comfortable Sieg Heiling alongside his other neo-Nazi associates.

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Matthew Combs (center in green flight jacket and black balaclava) joins his neo-Nazi associates at Jimmy Marr's residence for a Holocaust denial demonstration on April 24, 2017, at 1321 G Street, Springfield, Oregon 97477

What originated as a simple protest against Jimmy Marr's rampant racism and white supremacy antics drew out Marr's close circle of neo-Nazi friends. The CCC Discord logs reveal the in depth planning for this action, including who would attend, what they would wear, and how they would be armed and respond to protesters.

The Discord logs reveal the weapons and tactics the participants planned to prep for the occasion including numerous firearms which would be hidden under a tarp behind Jimmy Marr's porch in addition to various individuals either open or conceal carrying. It has been revealed that neo-Nazi Kendall Stewart, (boyfriend to "Rhiannon Dark"), who was recently arrested again in Eugene, was in attendance with the counter protesters as an infiltrator. The Discord logs also state that Jake Laskey had planned to arrive at Jimmy Marr's for this event.

Wehrmacht
How many people do you have committed to carrying? Any aph or af?

blackhat 16
Yes, I had probably 2000. I just raised 1000 and he raised like a year.

Australopithecus Jordan
Are you guys going to march up?

Jimmy Marr
I'll start off with a perimeter of 1000 feet with my property line, so if you want to stand between the sidewalk and the perimeter tape. But it's an option.

Australopithecus Jordan
Have a ball hats?

Australopithecus Jordan
I have 3 extra pairs of safety glasses from shooting. Walk and stop all march but 2000.

Jimmy Marr
If you guys want to stand inside the perimeter it's ok with me. Just be advised that you'll be only with the 1000 marching. It's a suggestion for each of us to wear a ball hat.

blackhat 16
I just say we wear the gear on the park up to skin. That is talking about carry w/ AF.

Jimmy Marr
I plan to stay hidden deep within the park area.

Australopithecus Jordan
Open carry would be a good element. You guys call it. We could do no guns and brand it out, be open carry and keep it peaceful.

blackhat 16
Some of us would have to do no guns for legal reasons. There are two ARS I can think of to be candid for people who can

Matthew Combs (aka blackhat16) and Jimmy Marr discuss the potential of any American Front (AF) or American Patriots Brigade (APB) members attending the Holocaust denial demonstration. They discuss open carrying with firearms.

blackhat 16
The ARS will have to be picked up in Roseburg on the way up. I gave Clint your number so Walt can contact you directly.

Australopithecus Jordan
Open carry plan. I'll be armed.

Wehrmacht
Cool! Has coming? I'll grab them on the way up.

blackhat 16
Also have a man 14 to contribute.

Matthew Combs (blackhat16) and his associates arrange to be armed for the Holocaust denial demonstration at Jimmy Marr's residence.

Wehrmacht
We need a plant then

Wehrmacht
Someone pretending to be a libshit

Wehrmacht
Rest stop exit 149

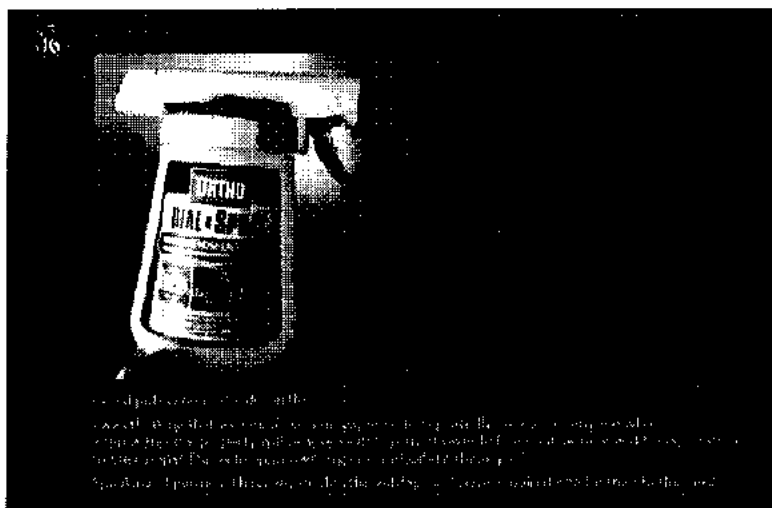
blackhat 16
Rice Hill, plenty of time. If you have enough time also stop at Wolf Clan, exit 182

Wehrmacht
Jake coming?

beammod
can we have an infrastructure channel to discuss databases, etc ?

blackhat 16
yes, but after 6:30

Matthew Combs (blackhat16) encourages his associates to stop at Wolfclan Armory on their drive up to Springfield and announces that Jake Laskey will be arriving to the Holocaust denial demonstration at Jimmy Mari's residence after 6:30pm. Justin Marbury aka "Wehrmacht" suggests placing an infiltrator within the counter protesters' group.

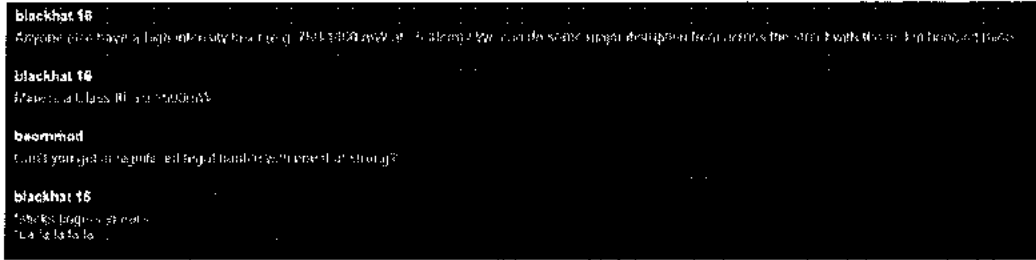


Matthew Combs (blackhat16) suggests spraying pesticides at counter protesters and compares this tactic to the "delousing showers" Nazis forced concentration camp prisoners to undergo.

blackhat 16
I want to go to the... (text is mostly illegible due to low resolution)

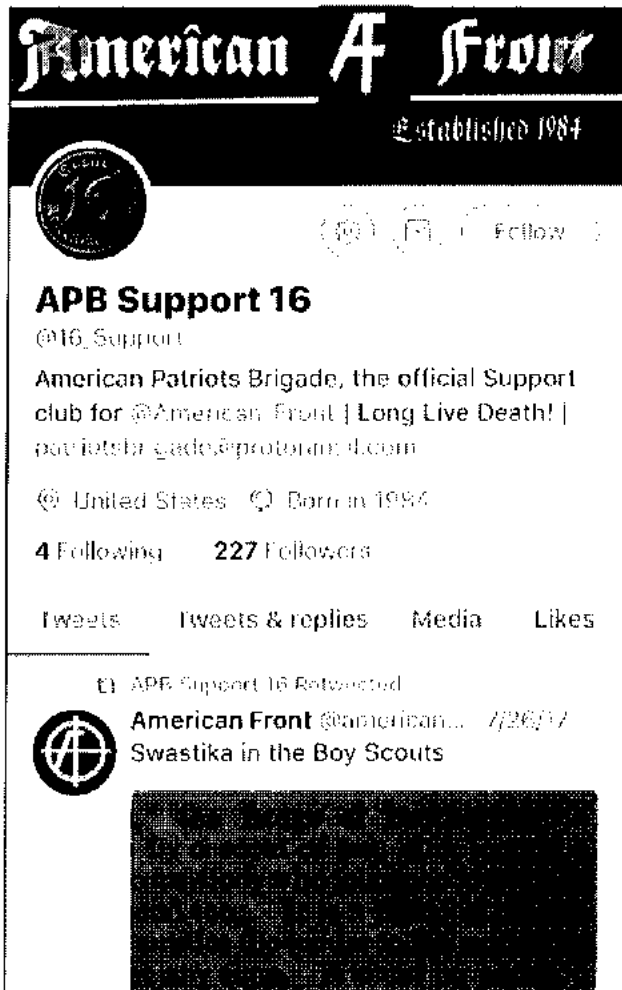
blackhat 16
I want to go to the... (text is mostly illegible due to low resolution)

Matthew Combs (blackhat16) describes his intention to physically assault counter protesters and encourages his associates to "fill some body bags."



Matthew Combs (blackhat16) announces he will bring a high intensity laser to the Holocaust denial demonstration.

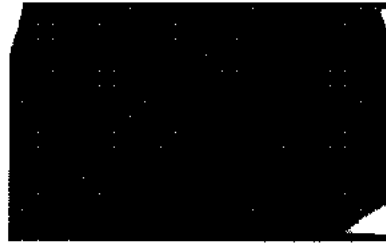
In addition to his personal Twitter account, which he uses to spout hate and slurs against non-whites and to organize regionally with other national socialists and neo-Nazis, Matthew Combs runs the @16_Support APB Support 16 Twitter account. This account represents the American Patriots Brigade, the official support group for American Front.



Matthew Combs runs the American Patriots Brigade Twitter account @16_Support

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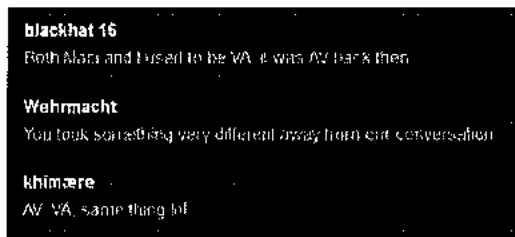


(/web/20180103064223/https://eugeneantifa.weebly.com/uploads/1/0/6/3/106305327/live-af-shirt-pic-grab_orig.jpg)

Matthew Combs (blackhat16) shows off a picture of himself wearing his new American Front supporter tshirt. His neck and arm tattoos are visible and identical to the ones in a picture Bethany posts of him on her Facebook account.

Previous to becoming the Eugene organizer for American Patriots Brigade, Matthew was associated with American Vanguard. But, because there were few members in the PNW chapter of American Vanguard, and their distance from each other prevented them from significant organizing, Matthew chose to ditch that endeavor and found himself a water boy position with American Front, instead.

(/web/20180103064223/https://eugeneantifa.weebly.com/uploads/1/0/6/3/106305327/live-af-shirt-pic-grab_orig.jpg)



Matthew Combs has also applied to become a member of the regional white nationalist group True Cascadia, but they rejected his application because he is associated with American Front. Apparently, the trashy crew that runs with American Front and American Patriots Brigade is not the sort of character or image more elite white supremacists are

going for. Combs laments about this rejection and complains that his girlfriend Bethany is barred from associating with any of the women involved in True Cascadia because her boyfriend is a member of a neo-Nazi group True Cascadia frowns upon. Read his rejection letter here:

"True" Cascadia has released an internal statement to its members regarding association with (persons such as) me:



Blackhat 16 · 1:49 PM

weebly.com/uploads/1/0/6/3/106

"We have denied several applicants due to membership or affiliation with WN 1.0 organizations, particularly American Front. We wanted to put forth our policy on these groups as there will most likely be interactions with them in the future and, while we cannot tell members who they can and can't associate with, it is strongly discouraged to affiliate with these organizations, especially for leadership. Cascadia is focused on community, family, and trying to bring this movement into the future.

not put it back into the past. While we all like the aesthetics, the aesthetics of WN 1.0, their low standards for vetting, history of violent inclining, literal federal violation, and membership with criminal parts are all things we want to distance ourselves from. The potential breakdown in security and peer-to-peer trust is far too great of a risk. We think these groups fit an important niche, attract people that aren't right for Cascadia, and are needed in the movement overall, but prefer to encourage them from afar. If this is a policy you disagree with as an applicant or current member or are already affiliated with these groups, then we understand and politely request you reveal your application/membership. Otherwise, we're confident you share our values and will be a great fit."



Well they rejected my application due to my being Support 16. So not just membership but even association with a group like AF.



Blackhat 16 · 10:29 AM

It's ridiculous that my wife (who is not AF) can't hang out with another WN woman (who is TC) because of MY affiliation w AF

I couldn't care less about it in regards to me, seapea. I'm upset only insofar as my wife feels hurt.



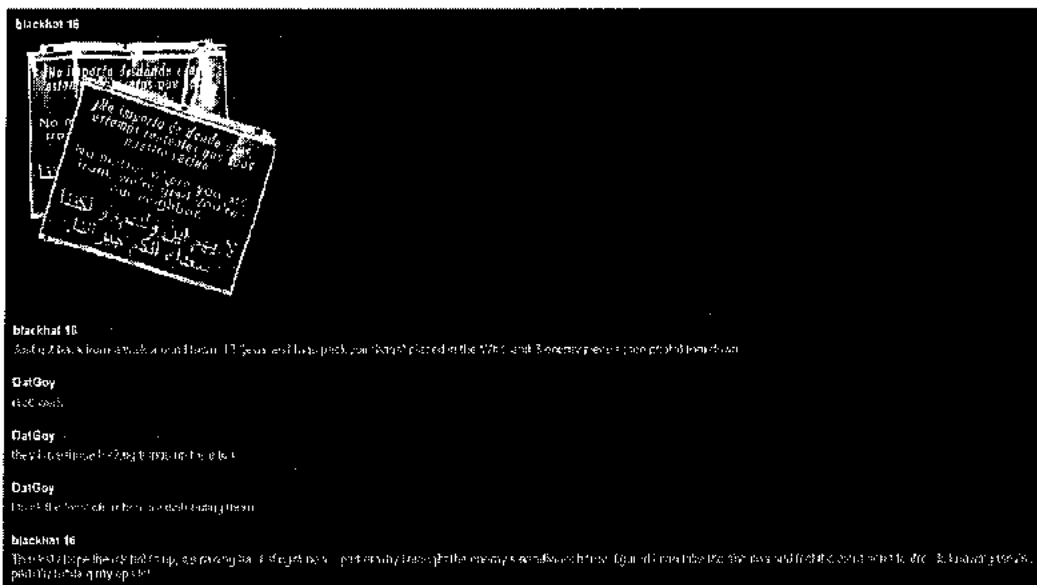
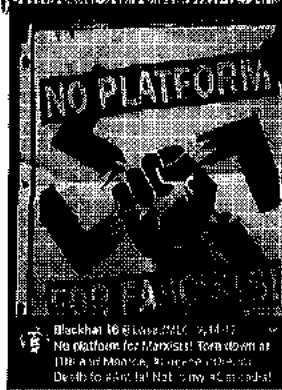
But I tend to be a lot more defensive of her feelings than my own.

Blackhat 16 · 2:18 PM

Matthew owns two automatic rifles and a mini 14. He has busied himself locally by taking down antifascist literature and replacing it with Nazi propaganda, largely in the Whiteaker

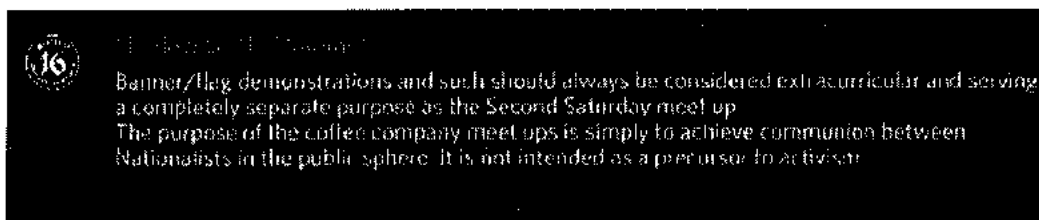
neighborhood. His associations include ties with the Atomwaffen Division in Washington.

(web.archive.org/web/20180103064223/https://eugeneantifa.w.../home/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood

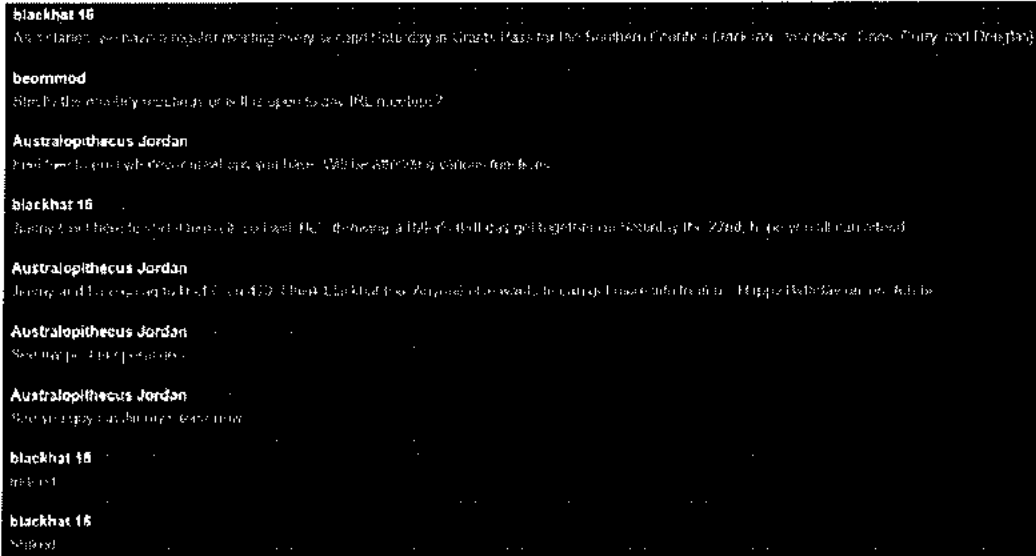


Matthew Combs (blackhat16) describes his habit of tearing down anti-racist and antifascist literature and putting up racist and homophobic propaganda, instead. His activities have been tracked to the Whiteaker neighborhood, parts of downtown Eugene, and the surrounding blocks around West 11th Avenue between Willamette and Chambers.

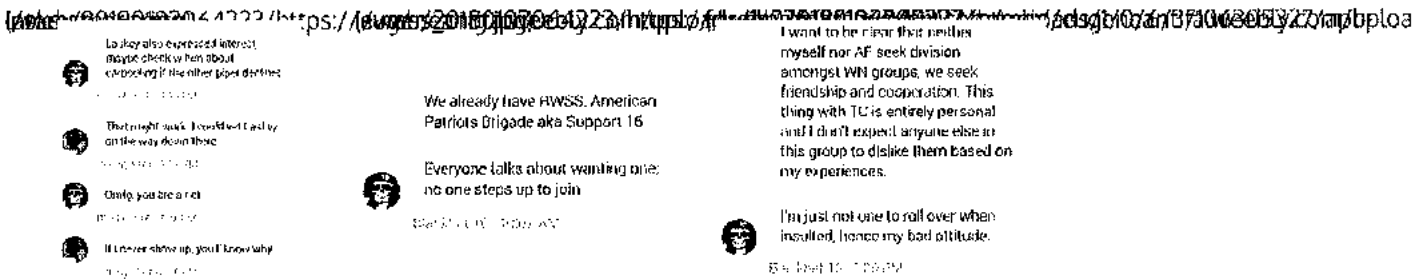
Throughout the conversations in the CCC Discord log, Combs acts not only as an organizer for American Patriots Brigade, but he serves as a primary organizing leader for the individuals and groups participating in the server. He aims to bring white nationalists together in the region with the goal of establishing a whites only homeland in the Pacific Northwest.



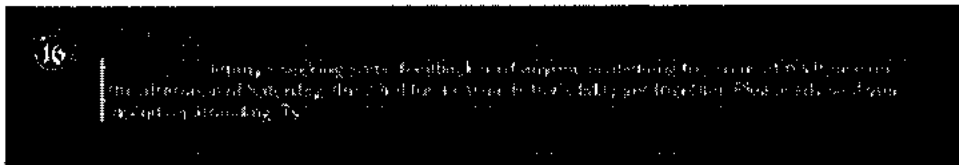
"Shadow Death Hammer" is an alias Matthew Combs uses in the Discord.



Matthew Combs (blackhat16) explains the regular white nationalist meetings that occur in Grants Pass. He invites everyone in the Discord server to Jimmy Marr's house on April 22nd, 2017 to celebrate Hitler's birthday. It is also revealed that Jimmy Marr and David Woods aka "Australopithecus Jordan" will be going to the University of Oregon on April 20, 2017. While Matthew Combs does not attend the UO event, other neo-Nazis in the Discord do show up with racially inciting messaging and are met with student resistance.



Matthew Combs is one of a handful of white supremacists active in the CCC Discord that live in the Eugene area. He, along with most of the other users, look up to Jimmy Marr, the elder, as a guiding force in their organizing, activities, and attitudes. Combs regularly joins Jimmy Marr for coffee, travels with him for banner drops and flag waves along highway overpasses, attends monthly white nationalist meetings, plans future endeavors, and frequents his home on social occasions such as a Hitler birthday party BBQ in the backyard of Jimmy and Judy Marr's home.



Matthew Combs (blackhat16) invites his fellow neo-Nazi associates to Jimmy Marr's house for a birthday party get together in honor of Hitler.

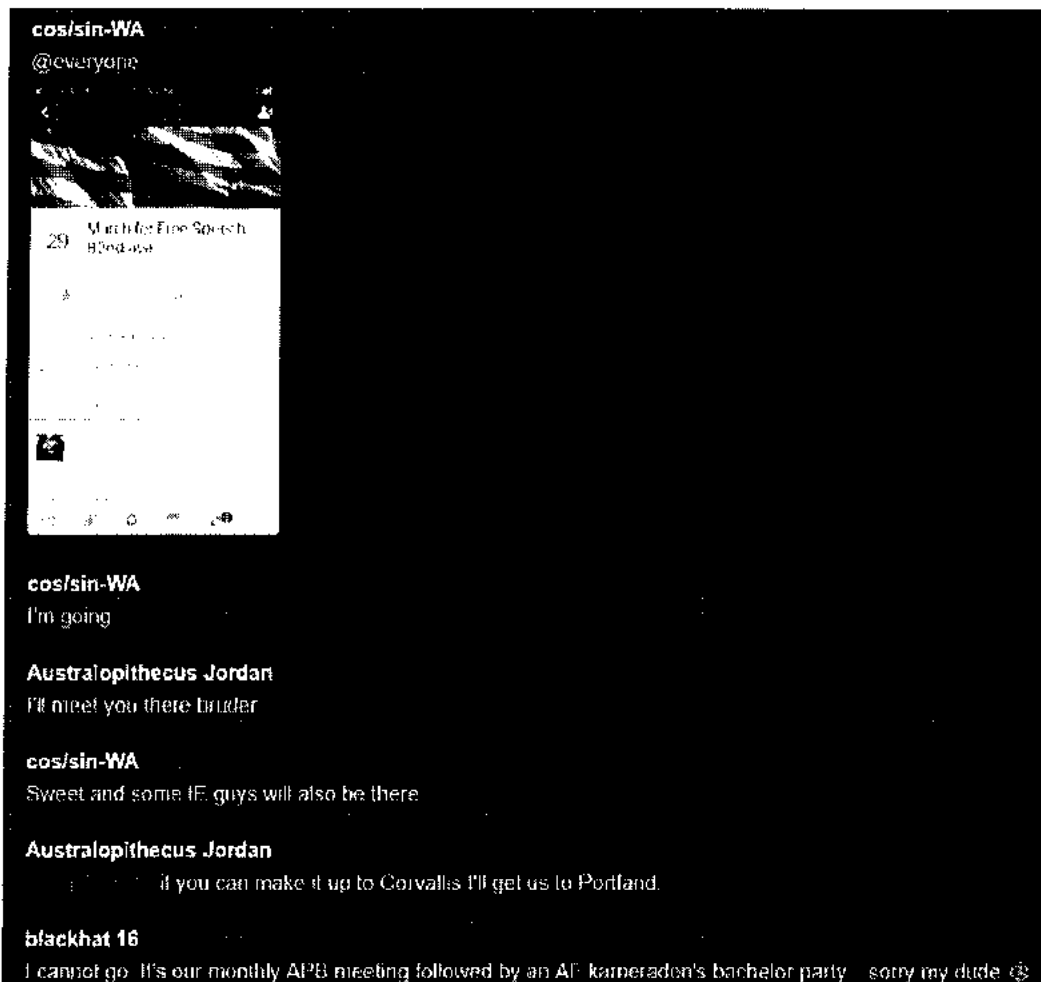
girl 4th word made swastika cookies for Uncle's bday at Jimmy's. We had a really good time, all muh favorite nutzees were there...



blackhat 16 - Yesterday, 9:24 PM

Matthew Combs (blackhat16) describes how his girlfriend, Bethany Sherman, made cookies in the shape of swastikas to take over to Jimmy Marr's house for a Hitler birthday party.

The Cascadian Coffee Company Discord logs leak reveals a tremendous amount of information about the participating neo-Nazis and their associates, their organizational mayhem, and activities. Thanks to the conversations in the discord and supplementary incriminating evidence, we have been able to gain further insight into Jake Laskey's participation in Oregon white supremacy organizing and affiliations. Matthew Combs describes his close knit relationship with Jake Laskey in the discord. He informs us that he is attending Jake's bachelor party and tells also of his plans to attend Jake Laskey and Amanda Marsh's "handfasting" (wedding) with his girlfriend Bethany.



CCC Discord users discuss attending the April 29, 2017 rally in Portland. "Cos/sin-WA" announces that Identity Europa (IE) members will be attending the event. Note: The Facebook event screenshot originates from white supremacist Jacob Ott. This is the rally where murderer Jeremy Christian was seen brandishing a baseball bat and wearing a thick, chain link wrapped around his neck. Matthew Combs (blackhat16)

announces that he will be unable to attend because that is the day of the monthly American Patriots Brigade meeting and he is also scheduled to attend American Front Jake Laskey's bachelor party.

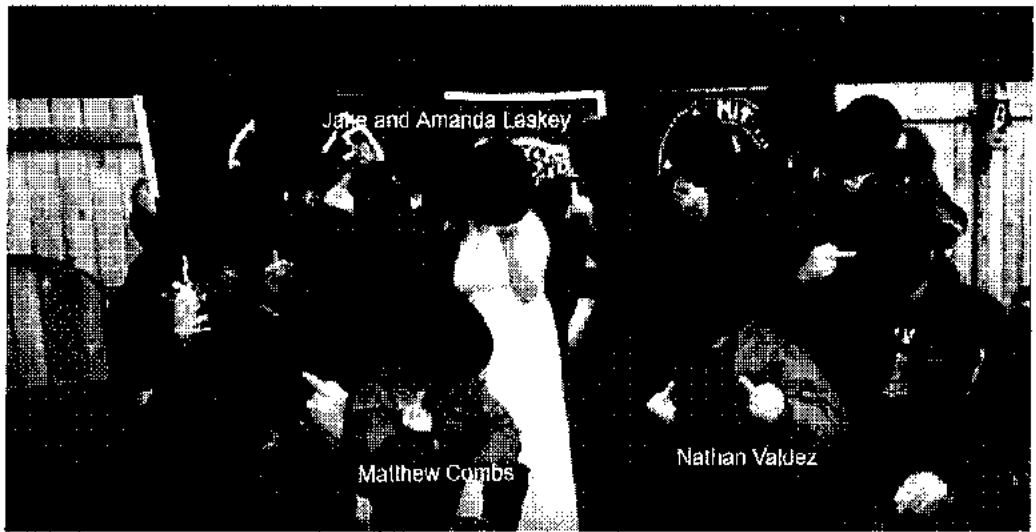
blackhat 16
 We're going to Laskey's handfasting that day (June 10th) should make it to the July meet up tho

Wehrmacht
 RZYWYH1333un

Wehrmacht
 hoping bethany could present a more female oriented argument for ethno nationalism to my lady

Matthew Combs (blackhat16) announces that he will be attending Jake Laskey and Amanda Marsh's "handfasting" (wedding) with his girlfriend Bethany Sherman on June 10, 2017. Here, Justin Marbury aka "Wehrmacht" states Bethany's name, identifying her as Matthew Combs's girlfriend.

Jake Laskey has repeatedly denied any affiliation with American Front despite having their logo tattooed on the back of his head and the endless evidence against his claim. This Discord leak contains additional, clear information that places Laskey as an organizing figure in American Front. Further, Laskey takes a moment out of his wedding celebrations to pose for a photograph with his fellow American Front and American Patriots Brigade members who were in attendance. Matthew Combs is pictured, kneeling in front of the bride and groom, in his green flight jacket.



Matthew Combs and Bethany Sherman attend Jake Laskey and Amanda Marsh's "handfasting." Combs is pictured above, posing under the groom and bride, in a group American Front and American Patriots Brigade picture.

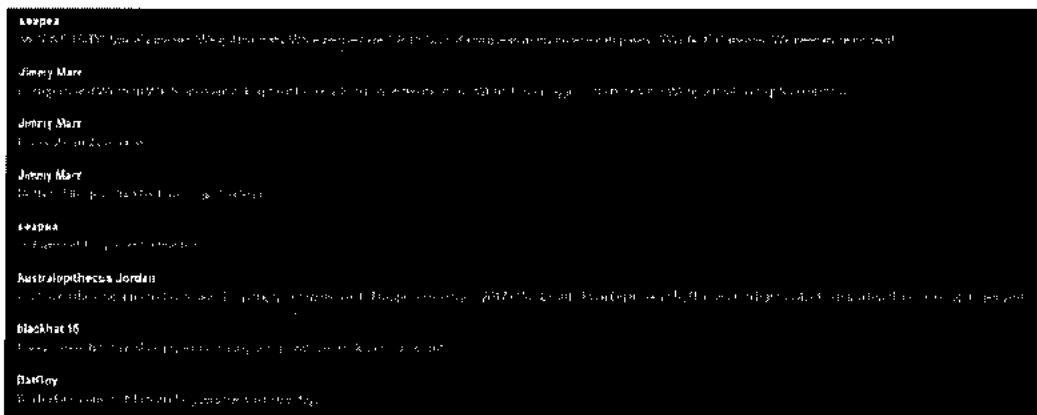
Similar to the way Combs looks up to Jimmy Marr as an uncle, Combs seems to affectionately refer to Jake Laskey in a brotherly way.

blackhat 15
 Laskey has been preaching that learn their culture and how they live so a more respectful, but even though I completely love and respect Jake, I just can't board

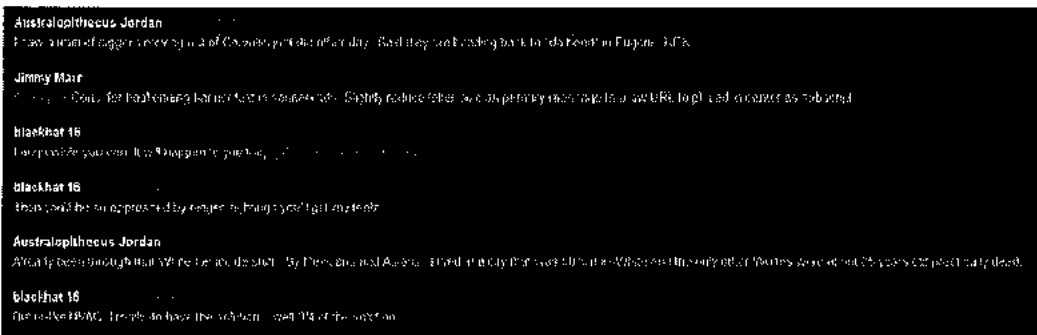
"I completely love and respect jake," - Matthew L. Combs

It will undoubtedly come as a big surprise to most of the community that Matthew Combs and Bethany Sherman have embedded themselves in what is generally considered a friendly,

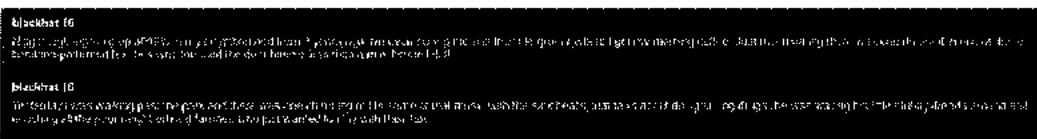
left leaning, social justice striving, diversity respecting atmosphere of Eugene, Oregon. Just under the surface of their "normie" presenting selves, Combs and Sherman harbor extreme racist views and are actively organizing to create a white supremacist homeland in the Pacific Northwest. The CCC Discord logs and supplemental leaked conversations have revealed their true opinions of their neighbors and community members. They are racist, homophobic, and sling slurs non-stop in their communications with other white nationalists. The participants in the group actively discuss their fantasy white utopia where non-white people, queer folk, and the alter-abled are exterminated so that the vision of their white utopia can come to fruition.



The Discord users compare college football teams to slavery and equate diversity to "white genocide."



David Woods aka "Australopithecus Jordan" and Matthew Combs (blackhat16) share their disdain for Black neighbors.

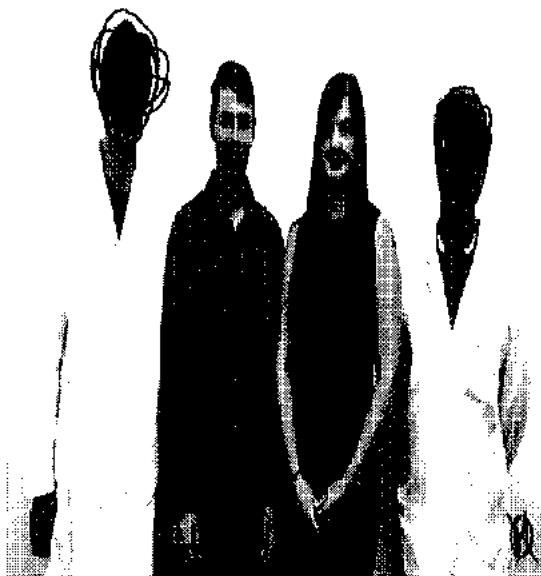


"Nigger sightings are up 3000% in my neighborhood from 3 years ago." - Matthew L. Combs

Matthew Combs assisted his girlfriend Bethany Sherman is establishing OG Analytical. His photo is still featured on their website even though his personal profile, position, and name has since been removed. We believe this is due to Combs attempting to take precautions against being exposed as a neo-Nazi. Thanks to our highly skilled and dedicated regional antifascist research team, we are able to connect "blackhat16" activity to Matthew Combs.

oganalytical.com

himself very lucky to have found a workplace that utilizes his laboratory skills and experience. With a meticulous nature and a fine attention to detail, [redacted] uses great care to guaranteed that each test result is as accurate as possible, and he is devoted to ensuring safe, clean, and quality medicine that Oregon patients can trust.



Matthew Combs and Bethany Sherman, center

Bethany Sherman
Executive Director, Founder

Bethany founded Oregon Growers Analytical in 2013 under the impulsion of creating a safer environment for her family and community. Born and raised in Oregon, she takes great pride in being able to contribute to the evolution of consumer safety and awareness in the State. Bethany brings a wealth of knowledge and experience to the labor, factory caregiving and Records Management in the Health Services sector, as well as Business Development and Marketing, Product Development and Implementation, Event Planning, and Office Management in the Software Development and Financial Services sectors.

A big catalyst for Bethany's decision to establish OG Analytical came in 2013 when Bethany's mother, Lili, was diagnosed with Multiple Sclerosis. While researching treatment options, Bethany discovered that scientists across the world have been actively working to study cannabis as a safe and effective neuroprotectant and anti-inflammatory, amongst many other benefits. Lili's a tough cookie - she's never been a proponent for marijuana, and her introduction to the alternative medicine has not been without reservation. However, with the passing of HB 3439 in 2014, Lili now has her OMSA Card and Bethany is motivated to secure a safe and legitimate platform for her mother and other OMSA patients to use cannabis as a treatment for MS and other ailments.

M.L. Combs
Industry Consultant, Social Media Director, Grow Ninja

M.L. Combs became introduced to the cannabis industry at a very young age, first experiencing "yords" as a teenager growing up in Kenya. Since then he has had the rare luck to befriend cannabis cultivators and enthusiasts around the world, from Japan to Tennessee. In 2006 Combs began processing cannabis for growers in Humboldt and Jackson Counties, a busy discovery which matured through the plant to its full potential, and then that resulted in 4 distinct products. 2 years later, after Combs applied these principles to his own grow-op, he has been cultivating organic, well-grown cannabis ever since. A search for better markets led Combs to connect with reputable East Bay dispensaries such as Berkeley Patient Group, Humboldt Health Center, and Purvis Health Patient Center, where he became a familiar face among the regular vendors. Now, with many years of industry knowledge under his belt, M.L. Combs offers private grow optimization, seeding and cloning for Oregon Growers Analytical as an industry consultant.

Oregon Growers Analytical bios on Bethany Sherman and Matthew Combs (2014)

<https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/uploads/1/0/6/3/106>





Bethany Sherman

- Add Friend
- Message
- More



Maude Mabel

Equalist Mommy. Our children deserve to be raised in a wholesome environment free of oppression against whites. #First.#Cascadia #14swiss

9 posts

Bethany Marie Sherman was born on May 13, 1982, has a felony conviction from 2004, and drives a Subaru with an Oregon license plate number 731 FPA. She has gone by several name on her Nazi Twitter account: Mabel Maude, Cascadia Maude, and currently Mrs. Blackhat. Surprisingly, Bethany has served as President of the local group Women Leaders in Cannabis and as Executive Director for the not-for-profit Cannabis Safety Institute. She has served on the OLCC Recreational Marijuana Technical Advisory Subcommittee Laboratories and Traceability and is currently the Manager and CEO of OG Analytical.

Out of all the girlfriends and wives associated with the members of the leaked CCC Discord server and private Twitter chats, Bethany Sherman seems the most knowledgeable and involved in her partner's own neo-Nazi organizing. In addition to Justin Marbury's (aka "Wehrmacht's") delightful, slip-of-the-tongue suggestion that Bethany might be capable of converting his own girlfriend to neo-Nazi ideology via her "woman's perspective," there are a number of other instances in which Bethany expresses her white supremacist views.

<https://web.archive.org/web/20180103064223/https://eugeneantifa.w...> <https://www.facebook.com/uploads/1/0/6/3/106>

I love the diversity swastika, Jimmy!!! I could easily make that a sticker, too, if someone wants to foot the bill. I recommend ditching the red text. I can even change some of the text so it doesn't say stupid shit like "we are all one race" lol



Justin, Mitchell is sending me some of those stickers after he gets them. I'll gladly pass some on!

Thanks, Mitchell!!!

Cascadia Maude · 8:52 AM

Mrs. Blackhat · 1:57 PM

<https://web.archive.org/web/20180103064223/https://eugeneantifa.w...> <https://www.facebook.com/uploads/1/0/6/3/106>

Mrs. Blackhat · 14th word · 2/9/17
Replying to [redacted]
@Genocide Jimmy
@base@MLC Jimmy, I love how you always take the high ground, no matter how much shit these libtards sling. ❤️

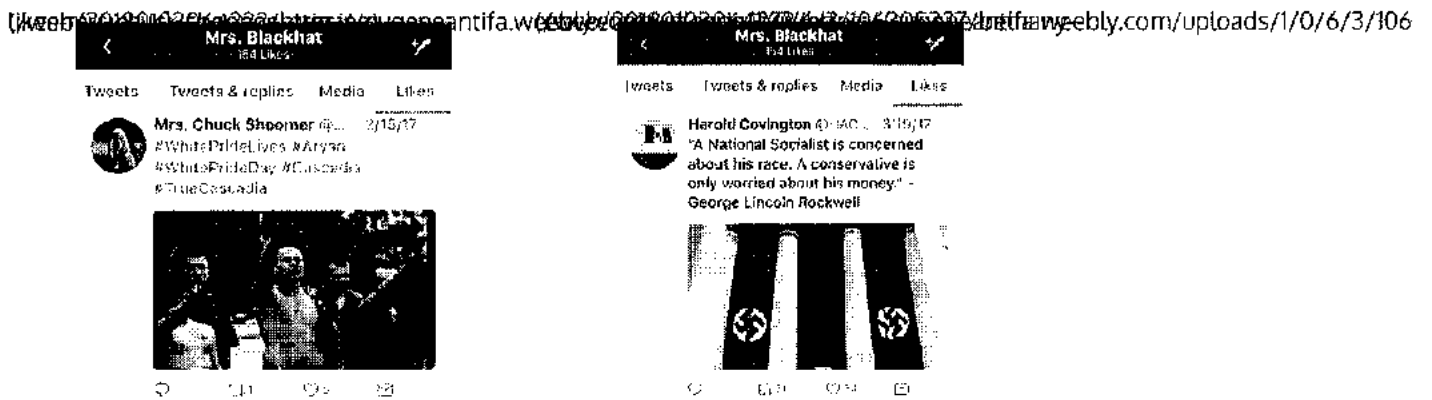
I have heard that shitlord 420 Commies want to be the TC. What's the deal?

Mitchell Maude · 8:02 AM

AV Oregon kind of fizzled out. I heard the guy running the Oregon chapter found better prospects. I really don't know much about TC, but I've met some TC folks and thought they were great.

Cascadia Maude · 8:10 AM

Bethany Sherman provides a prime example of how supposedly "liberal," yet predominantly white communities can easily harbor hardcore white supremacist organizers. In her role as CEO of OG Analytical, Bethany was in a position to begin a number of groups aimed at supporting "women in the industry," and was repeatedly profiled in cannabis industry publications and local papers for her work. Her white corporate feminism was, it seems, in no way incompatible with her belief in, for example, a white ethnostate, or in "the Jewish conspiracy" at the heart of neo-Nazi ideology. Simplistic and self-centered "hippie" lifestyle choices are not, and have never been sufficient to inoculate individual white people against possible far-right radicalization, and Oregon itself sets a prime example of how certain "alternative" lifestyles and communities serve as a near-perfect environment for crypto fascist and white traditionalist organizations to incubate within.



Left: Bethany "likes" a tweet by another PNW fascist's wife which pictures young, white men sieg heiling; Right: Bethany "likes" a tweet by Northwest Front organizer Harold Covington which quotes former president of the American Nazi Party.



Matthew Combs and Bethany Sherman (aka Mr. and Mrs. Blackhat) show their support for the creation of a white homeland in the Pacific Northwest.

Matthew Combs and Bethany Sherman are expecting their second child and planning to move away from Eugene as soon as possible. They are seeking to create a white only community in Douglas County. Combs' family is in the Glide area and Sherman's family is in the Roseburg area. The Eugene community will be safer without their presence, but other communities will have to deal with their neo-Nazi activity. Let us not make their experiences easier so long as they continue to hold these harmful beliefs, organize with other national socialist and white supremacists, and act in ways that put non-white, queer, and alter-abled communities in danger.

Urge your contacts not to financially support neo-Nazi activity. Do not rent from home owner Bethany Sherman at 1177 West 11th Avenue in Eugene. Urge the cannabis community not to do business with OG Analytical. The business can be contacted in person at its location at 2412 West 11th Avenue in Eugene with a second office at 4543 South Pacific Highway in Pheonix, Oregon; by phone at: (541) 735-3328, (541) 601-7646, and (503) 941-8689; by tweeting to @OGAnalytical and @OG_Bethany; and reviews can be left on their Facebook page. Ask your local dispensaries if their products are tested by OG Analytical, and if they are, urge them to cut ties with this business and purchase your Nazi-free tested

product at an alternative dispensary instead.

Eugene, and the state of Oregon, are diverse communities. The citizens of Eugene and beyond deserve to know that this sort of virulent hatred will not be tolerated in our businesses and communities. The violence espoused by Sherman and Combs has no place in our state.

Additional articles in this series:

Revealed: Northwest Neo-Nazi Groups' Private Chat Server Leaked to Antifa

(<https://web.archive.org/web/20180103064223/http://rosecityantifa.org/articles/regional-groups/>)

David Woods- The Rapper Who Became a Nazi

(<https://web.archive.org/web/20180103064223/http://rosecityantifa.org/articles/david-woods/>)

Spotlight on Justin Marbury: A Nice Buddhist Boy Goes Nazi

(<https://web.archive.org/web/20180103064223/https://pnwawc.com/2017/12/07/spotlight-on-justin-marbury-a-nice-buddhist-boy-goes-nazi/>)

Nazi Tactics in Central Oregon

(<https://web.archive.org/web/20180103064223/http://rosecityantifa.org/articles/fascist-tactics/>)

American Patriots Brigade and Neo-Nazi Organizing On Discord: It's Worse Than You Think
(<https://web.archive.org/web/20180103064223/https://pnwawc.com/2017/12/09/american-patriots-brigade-and-neo-nazi-organizing-on-discord-its-worse-than-you-think/>)

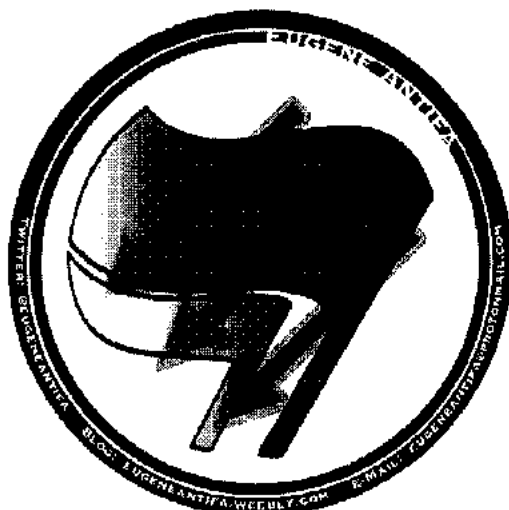
Two Young Fascists: Ian Lawton and Austin Wilkison

(<https://web.archive.org/web/20180103064223/https://rosecityantifa.org/articles/lawton-wilkison/>)

Judy & Jimmy Marr: Springfield Nazis Tolerated For Too Long

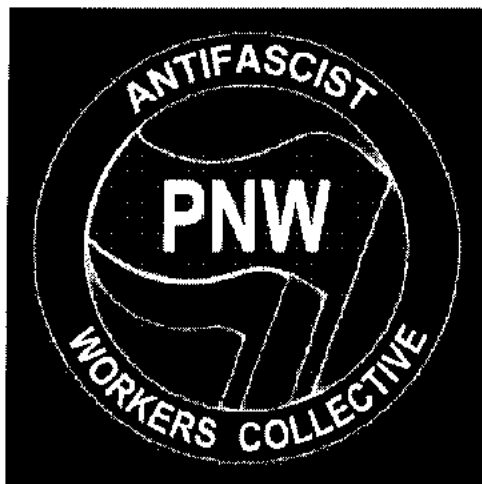
(<https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/judy-jimmy-marr-springfield-nazis-tolerated-for-too-long>)

If you have any additional information on any fascist and white supremacist activity, please email us:



Eugene Antifa

(<https://web.archive.org/web/20180103064223/mailto:eugeneantifa@protonmail.com>)



Pacific Northwest Antifascist Workers Collective

(<https://web.archive.org/web/20180103064223/mailto:pnwantifascist@protonmail.com>)



Rose City Antifa

(https://web.archive.org/web/20180103064223/mailto:fight_them_back@riscup.net)

(<https://web.archive.org/web/20180103064223/http://twitter.com/share?url=https://eugeneantifa.weebly.com/1/post/2017/11/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood.html>)

0 Comments (<https://web.archive.org/web/20180103064223/https://eugeneantifa.weebly.com/home/introducing-mr-mrs-blackhat-the-nazis-in-your-neighborhood#comments>)

Your comment will be posted after it is approved.

Leave a Reply.

Name (required)

Email (not published)

Website

Comments (required)

Notify me of new comments to this post by email



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Exhibit B

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): WILLIAM D. JOHNSON, ESQ., State Bar No. 101780 350 S. Figueroa St., Suite 190 Los Angeles, California 90071 TELEPHONE NO.: (213) 621-3000 FAX NO.: (213) 621-2900 E-MAIL ADDRESS: johnson@loslaw.com ATTORNEY FOR (Name): Bethany Sherman and OG Analytical	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister St MAILING ADDRESS: 400 McAllister St CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME: Civic Center Courthouse	
PLAINTIFF/PETITIONER: Bethany Sherman and OG Analytical DEFENDANT/RESPONDENT: DOES 1-10	
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	CASE NUMBER CGC-18-569429

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
Weebly, Inc., Legal Compliance Dept., 460 Bryant Ave Suite 100 San Francisco, CA 94107

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): William Johnson, Esq. On (date): October 2018 At (time) 10:00 a.m. Location (address): 350 S. Figueroa St., Suite 190, Los Angeles, California 90071
Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

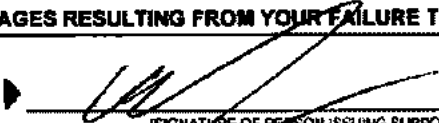
Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1986.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: **September 11, 2018**
William Johnson

(TYPE OR PRINT NAME)


 (SIGNATURE OF PERSON ISSUING SUBPOENA)
Attorney for Plaintiffs
 (TITLE)

(Proof of service on reverse)

PLAINTIFF/PETITIONER: Bethany Sherman and OG Analytical	CASE NUMBER:
DEFENDANT/RESPONDENT: DOES 1-10	CGC-18-569429

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) Witness fees were paid.

Amount: \$ _____

(2) Copying fees were paid

Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

a. Not a registered California process server.

b. California sheriff or marshal.

c. Registered California process server.

d. Employee or independent contractor of a registered California process server.

e. Exempt from registration under Business and Professions Code section 22350(b).

f. Registered professional photocopier

g. Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

(For California sheriff or marshal use only)

I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

SHORT TITLE: SHERMAN and OG ANALYTICAL v. , DOES 1-10	CASE NUMBER: CGC-18-569429
--	-------------------------------

ATTACHMENT (Number): 3

(This Attachment may be used with any Judicial Council form.)

1. All documents related to the identity of the creator of the webpage at "eugeneantifa.weebly.com", including but not limited to documents that provide all names, mailing addresses, phone numbers, billing information, date of account creation, account information and all other identifying information associated with the email address under any and all names, aliases, identities or designations related to the email address, from the date of the creation of the address to the present; and
2. All documents related to the usage of the webpage "eugeneantifa.weebly.com", including but not limited to documents that provide IP [Internet Protocol] logs, IP address information at time of registration and subsequent usage, computer usage logs, or other means of recording information concerning the email or Internet usage of the email address, from the date of the creation of the address to the present.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 2 of 2

(Add pages as required)

Exhibit C



business information center **business name search** oregon business guide

referral list business registry/renewal forms/fees notary public

uniform commercial code uniform commercial code search documents & data services

Business Name Search

New Search	Printer Friendly	Business Entity Data				09-27-2018 17:22
Registry Nbr				Registry Date	Next Renewal Date	Renewal Due?
984955-92	ABN	ACT		12-20-2013	12-20-2019	
Entity Name	OG ANALYTICAL					
Foreign Name						
Affidavit?	N					

New Search	Printer Friendly	Associated Names				
Type	PPB	PRINCIPAL PLACE OF BUSINESS				
Addr 1	1177 WEST 11TH AVENUE					
Addr 2						
CSZ	EUGENE	OR	97402	Country	UNITED STATES OF AMERICA	




The Authorized Representative address is the mailing address for this business.

Type	REP	AUTHORIZED REPRESENTATIVE		Start Date	12-20-2013	Resign Date	12-06-2017
Name	DAVID	L	JACOBSON				
Addr 1	SUITE 800						
Addr 2	975 OAK STREET						
CSZ	EUGENE	OR	97401	Country	UNITED STATES OF AMERICA		

Type	REG	REGISTRANT					
Of Record	984947-93	OREGON GROWERS ANALYTICAL, LLC					
Addr 1	1177 WEST 11TH AVENUE						
Addr 2							
CSZ	EUGENE	OR	97402	Country	UNITED STATES OF AMERICA		

Business Entity Name			Start Date	End Date
OG ANALYTICAL	EN	CUR	12-20-2013	

Please [read](#) before ordering [Copies](#).

Image Available	Action	Transaction Date	Effective Date		Name/Agent Change	Dissolved By
	AUTHORIZED REPRESENTATIVE RESIGNATION	12-06-2017		FI	Representative	
	RENEWAL OF REGISTRATION	11-22-2017		FI		
	RENEWAL PAYMENT	12-07-2015		SYS		
	APPLICATION FOR REGISTRATION	12-20-2013		FI	Representative	

Counties Filed

All Counties Filed.

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For comments or suggestions regarding the operation of this site, please contact : corporation.division@state.or.us