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Attorneys for Plaintiff  
BETHANY SHERMAN and  
OG ANALYTICAL

ELECTRONICALLY  
**FILED**  
*Superior Court of California,  
County of San Francisco*  
**10/29/2018**  
Clerk of the Court  
BY:EDNALEEN ALEGRE  
Deputy Clerk

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

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

Plaintiff,

vs.

DOES 1 through 10, inclusive,

Defendants.

CASE NO. CGC 18-0569429

**DECLARATION OF BETHANY  
SHERMAN IN SUPPORT OF  
OPPOSITION TO MOTION TO  
QUASH SUBPOENA DUCES TECUM  
AND FOR MONETARY SANCTIONS**

Date: November 9, 2018  
Time: 9:00 a.m.  
Dept.: 302

1 **DECLARATION OF BETHANY SHERMAN**

2 1. I am a plaintiff in this action, and I am over 18 years of age. I have personal  
3 knowledge of the matters set forth in this declaration and if called upon to testify to such  
4 matters, I could and would do so competently.

5 2. I am submitting this declaration in support of my opposition to DOE Defendant's  
6 Motion to Quash Subpoena Duces Tecum as both myself individually and as the Managing  
7 Member of Oregon Growers Analytical ("OG Analytical"), an Oregon limited liability company

8 3. I am a member-owner and the Managing Member of OG Analytical which  
9 formerly provided laboratory testing services to cannabis growers and producers in Oregon. Due  
10 to the Defendants' efforts to defame me and drive away OGA's customers, I have been forced to  
11 cease operations and shut down the business.

12 4. Prior to Defendants' libels against me, I have always enjoyed a very good  
13 reputation in both my personal and professional life, and I have been well respected in both my  
14 local business community as well as my local community in general.

15 5. Specifically, on November 23, 2017, Defendants anonymously posted an article  
16 on a website hosted by Weebly, <https://eugeneantifa.weebly.com>, that I am a neo-Nazi operating  
17 a "white supremacist Twitter account"; that I believed in "the 'Jewish conspiracy' at the heart of  
18 neo-Nazi ideology" and that I act "in ways that put non-white, queer, and alter-abled  
19 communities in danger."

20 6. Each of these statements were false.

21 7. I am not and never have been a "neo-Nazi." I do not belong to any neo-Nazi  
22 groups. I do not believe in or advocate for the extermination of other races. I do not profess to  
23 believe in the genetic superiority of whites or Caucasian.

24 8. I do not attack, threaten or harass members of non-white, queer, and alter-abled  
25 communities nor do I advocate violence, threats or harassment of members of non-white, queer,  
26 and alter-abled communities.

1           9.     I have never been to any political meeting or gathering that was organized for the  
2 purpose of discussing white supremacy, Nazi or neo-Nazi ideals, racialism, or even nationalist  
3 agendas.

4           10.    I do not operate a "white supremacist Twitter account." I do not operate any  
5 Twitter account to advocate or promote a white supremacist agenda or threaten, harass,  
6 intimidate, or advocate violence against non-white, queer, and alter-abled individuals, groups or  
7 communities.

8           11.    The only public Twitter account I operate is "OG\_Bethany" and made only  
9 business related tweets until the business closed.

10          12.    I have no other Twitter accounts and any other Twitter accounts that I have had  
11 were private and used solely to communicate with friends privately, and when I shared or  
12 commented on other posts, I was not harassing or threatening to harm anyone or advocating that  
13 anyone do violence against anyone or cause anyone else harm. I have never done that and never  
14 will.

15          13.    I also have never stated that I believe in a "Jewish conspiracy" or in a conspiracy  
16 of Jews against white people.

17          14.    In addition, the Weebly article also falsely stated that I baked cookies in the shape  
18 of swastikas for a barbeque on April 22, 2017. I did not.

19          15.    The also falsely stated that I am seeking to create a white-only community in  
20 Douglas County, Oregon. This is absolutely untrue.

21          16.    In addition, Defendants "doxed" me by posting on the website private, personal  
22 information about me including my home address, where I work, pictures of my boyfriend  
23 holding our infant daughter and that I was pregnant and expecting a second child, all the while  
24 urging people to harass me and drive me out of my home state of Oregon.

25          17.    As a result of all this, I have been extremely distressed, in great fear and anxiety  
26 for the safety of myself and her family and have had my reputation harmed. OG Analytical  
27 suffered a catastrophic loss in business and was forced to cease operations and consider offers to  
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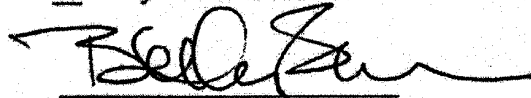
1 buy its assets for pennies on the dollar, as a result of people in the community reading or learning  
2 about Defendant's false postings. I have been forced to shut down the operations of my business,  
3 forced to move from my home in Eugene, Oregon and have lost future professional  
4 opportunities.

5 18. Shortly after the article was posted in December 2017, I contacted Weebly and  
6 requested that they take down the article because it violated Weebly's terms and conditions for  
7 use. Weebly complied, and the article was promptly removed. However, it was too late, as the  
8 Defendants' libels had already spread throughout the community.

9 19. As a result, I filed this lawsuit to seek compensatory and punitive damages from  
10 whomever spread these false statements about me and destroyed my business, and I am seeking  
11 to subpoena the Weebly account information so I can learn their identities and lawfully serve  
12 them with a summons and complaint to bring them before the Court.

13 20. I did not bring this lawsuit to pursue "extrajudicial" harassment or violence  
14 against anyone. I brought this lawsuit precisely for "judicial" reasons -- to identify the  
15 anonymous individual or individuals who defamed me, bring them before a court of law, and  
16 prove my legitimate claims for damages against them.

17  
18 I declare under penalty of perjury under the laws of the State of California that the  
19 foregoing is true and correct. Executed this 28<sup>th</sup> day of October 2018.

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22 Bethany Sherman  
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