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 15 JEREMY WHITELEY

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**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

BREAKING CODE SILENCE, a  
 California 501(c)(3) nonprofit,

Plaintiff,

vs.

KATHERINE MCNAMARA, an  
 Individual; JEREMY WHITELEY, an  
 individual; and DOES 1 through 50,  
 inclusive,

Defendants.

Case No. 2:22-cv-002052-SB-MAA

**DECLARATION OF KATHERINE  
 MCNAMARA IN SUPPORT OF  
 MCNAMARA MOTION FOR  
 SUMMARY JUDGMENT OR IN  
 THE ALTERNATIVE PARTIAL  
 SUMMARY JUDGMENT**

Date: April 17, 2024

Time: 10:00 a.m.

Crtrm: 880

*[Assigned to the Hon. Maria A. Audero]*



**DECLARATION OF KATHERINE MCNAMARA**

I, KATHERINE MCNAMARA, hereby declare and state under penalty of perjury the following facts:

1. I am over the age of eighteen and a defendant the within action. I submit this Declaration in support of the Motion for Summary Judgment filed on my behalf. I have personal knowledge of the following facts and, if called upon to testify, I can and will truthfully testify thereto.

2. The “troubled teen industry” or “TTI” is a term commonly used to refer to a broad range of programs in which thousands of children annually, are branded as “problem children” for a variety of reasons are sent, often against their wills, to congregate care facilities (sometimes known as “boot camps,” “behavioral modification schools,” or other similar monikers). Although marketed as therapeutic treatment centers, many facilities simply collect public funding and also cruelly abuse the children, including physical, verbal, and sexual abuse, isolation, forced hard labor, chemical sedation, sleep and food deprivation, attack therapy and aversion therapy. For many years, advocates seeking to help raise attention to the issues with TTI facilities, reform them, and end institutional child abuse commonly use the phrase “Breaking Code Silence” because “Code Silence” is a common form of punishment used by many TTI facilities in which no talking is strictly enforced.

3. As a teenager, I was sent to two such TTI facilities, including Provo Canyon School, a private congregate care facility for troubled teens in Provo, Utah, where I both suffered and witnessed terrible abuse. As a result, I have been an active anti-TTI advocate for over five years, since approximately 2017.

4. Because one of my skills is data-gathering, in 2017 I began mining public records for information and documents related to TTI facilities and evidence of the abuse. My goal was to gather as much data as I could to expose these TTI facilities. These documents, along with the survivor data I compiled over the years,



1 is housed on my personal Google Drive, and organized on Zotero, which is an  
2 opensource tool for sharing research with others. Similar to an on-line bibliography,  
3 Zotero organizes the links to data which is housed somewhere else.

4 5. In 2019, I began collaborating with other survivors about the need to  
5 bring the issues to the public’s attention and stop the institutional abuse. That year,  
6 some of the survivors I was originally collaborating with, including Chelsea  
7 Papciak, purchased the domain name <breakingcodesilence.net> (the “.Net  
8 Domain”) and launched a splash page for a social media campaign.

9 6. To prevent anyone else from purchasing the similar  
10 <breakingcodesilence.org> domain name (the “.Org Domain”), in March 2020, I  
11 purchased the .Org Domain in my own name, with my own funds, using my own  
12 personal Hover.com domain registrar account. A true and correct copy of the March  
13 11, 2020 receipt from Hover reflecting my purchase of the .Org Domain is attached  
14 to the Index of Exhibits as **Exhibit 5**. At the time, I feared that a TTI program would  
15 purchase the .Org Domain and use it to undermine the anti-TTI movement. At this  
16 point, the domain <breakingcodesilence.com> (the “.Com Domain”) was already  
17 owned by another survivor and activist, Joshua Scarpuzzi, who authored a book  
18 titled “Breaking Code Silence” which was published in 2018.

19 7. Since purchasing the .Org Domain in March 2020, I have since  
20 renewed the .Org Domain every subsequent year, always in my own name, with my  
21 own funds, and always housing the domain in my personal Hover.com domain  
22 registrar account. True and correct copies of my annual renewal receipts from Hover  
23 for the .Org Domain are attached collectively to the Index of Exhibits as **Exhibit 6**.  
24 As seen on the initial renewal receipt, the .Org Domain first renewed on March 11,  
25 2021, prior to the formation of Plaintiff BREAKING CODE SILENCE (“BCS”).

26 8. Towards the end of 2020, I had discussions with the group of survivors  
27 that I was originally collaborating with about founding a nonprofit organization  
28 dedicated to advocating for survivors and against the institutionalized abuse. The



1 group, which included Chelsea Papciak, decided that they would use the .Net  
2 Domain.

3 9. On October 7, 2020, celebrity Paris Hilton led a protest calling for the  
4 closure of Provo Canyon School, where she was also previously “incarcerated” at  
5 the age of seventeen. The protest gained national and international media attention.  
6 Around this time, I was introduced to Defendant JEREMY WHITELEY  
7 (“Whiteley”), who had also been at Provo Canyon School, and Vanessa Hughes,  
8 who claimed to be a psychologist.

9 10. In mid-March 2021, a schism developed among the original group that  
10 I was collaborating to found a nonprofit advocacy organization. Chelsea Papciak  
11 and her group went their separate way, and no organization or entity was ever  
12 formed from this first group’s efforts. Chelsea Papciak and her group of former  
13 collaborators retained control of the .Net Domain after the split, while I retained  
14 ownership and control of my .Org Domain.

15 11. After the original group of advocates that I was collaborating with  
16 disintegrated, I, together with Whiteley, Hughes, and Jennifer Magill, decided to  
17 form a nonprofit organization. Along with other new collaborators, this new group  
18 decided that the nonprofit organization would be named “Breaking Code Silence  
19 Youth Advocacy Network.” Vanessa Hughes later asked me to purchase several  
20 domains that were a variation of “Breaking Code Silence Youth Advocacy  
21 Network” for the organization, which I did between March 17 and 18, 2021. A true  
22 and correct copy of the Hover receipts for the various “Breaking Code Silence  
23 Youth Advocacy Network” domains I purchased for BCS are attached collectively  
24 to the Index of Exhibits as **Exhibit 107**. On March 18, the new collaborators had a  
25 pre-incorporation meeting. My .Org Domain was never discussed or brought up in  
26 that pre-incorporation meeting, nor has Breaking Code Silence produced the  
27 recording of that meeting in discovery in this action. During the pre-incorporation  
28 meeting, the founders discussed their intent to incorporate and create a temporary



1 assignment, which ultimately was never created. No decisions made during this pre-  
2 incorporation meeting were later voted on or ratified by the board post-  
3 incorporation. A true and correct copy of the meeting minutes titled “Breaking Code  
4 Silence Youth Advocacy Network Meeting Minutes 3/18/2021 are attached to the  
5 Index of Exhibits as **Exhibit 108**.

6 12. BCS was later incorporated on March 22, 2021. Hughes was  
7 responsible for incorporating the new entity. For reasons that were never made clear  
8 to me, I was told that we were registering the organization with the State of  
9 California under the name “Breaking Code Silence,” excluding the latter half of the  
10 name, i.e., “Youth Advocacy Network,” that we had previously agreed upon.

11 13. I am a cyber-security technical solutions architect for a multinational  
12 technology conglomerate corporation. Whiteley also has extensive experience in  
13 information technology. Based on our technical backgrounds, Whiteley and I stood  
14 up the information technology and assurance infrastructures as well as the website  
15 and related WordPress account for BCS. We also initially set up and/or had  
16 administrative access to a number of BCS’s online accounts.

17 14. Prior to BCS’s incorporation, and before the organization could acquire  
18 a suitable domain, Hughes wanted to have formal email addresses for conducting  
19 organizational business. Because the former group of collaborators retained control  
20 of the .Net Domain and BCS had yet to purchase its own domain, I allowed the  
21 organization to temporarily use the .Org Domain that I previously purchased in  
22 March 2020. A true and correct copy of my March 17, 2021 Facebook chat  
23 messages with some of the founding members of BCS wherein I advised them that I  
24 owned the .Org Domain and would use it initially to set up BCS emails is attached  
25 to the Index of Exhibits as **Exhibit 109**. To set up the email addresses, I was  
26 required to purchase an add-on service for my .Org Domain from Hover (the domain  
27 registrar). I later sought reimbursement from BCS for the cost of this add-on service  
28 which was necessary to set up the emails and the several separate domains that



1 Hughes requested that I purchase for the organization in March 2021 (e.g Breaking  
2 Code Silence Youth Advocacy Network domains and several others), but I never  
3 asked for any reimbursement for my .Org Domain purchase itself, or for any  
4 subsequent registrations of that domain. Ultimately, I was never paid, and the email  
5 inboxes were eventually migrated to a free service using Google for Nonprofits.

6 15. By creating subdomains, the .Org Domain is capable of hosting  
7 multiple websites. For example, subdomain1.breakingcodesilence.org is a possible  
8 subdomain that could be registered for other uses. Notwithstanding, to date, BCS  
9 has been the only one that I have permitted to use my .Org Domain since 2021.  
10 Attached to the Index of Exhibits as **Exhibit 7** is a true and correct copy of a  
11 screenshot I took on October 30, 2023, which accurately depicts the Google online  
12 Search Console Help page explaining domain properties and subdomains at:  
13 <https://support.google.com/webmasters/answer/34592?sjid=1232802067652262856>  
14 8-NA#domain\_property&zippy=%2Cdomain-property-examplecom.

15 16. On or about March 29, 2021, Whiteley paid for and set up the web  
16 hosting that the .Org Domain pointed toward (with the company Cloudways), using  
17 his own personal funds, in his own name, with his own email and home address.

18 17. Pursuant to Google’s Terms of Service, which I am bound to as a  
19 domain registrant, domain owners control the entire domain services property.  
20 Sometime between April and June 2021 (while I was still a BCS officer/director), I  
21 followed Google’s steps to verify my ownership of the .Org Domain by:

- 22 a. Logging into my Hover.com domain registrar account that I have  
23 had since 2016;
- 24 b. Editing my domain’s DNS services by:
  - 25 i. Clicking “add” to add a DNS entry;
  - 26 ii. Choosing a “TXT Record” which shows the third-party  
27 service that you own the domain; and

28



1                   iii. Adding the TXT Record with text verification I received  
2                   from Google.

3                   c. Attached to the Index of Exhibits as **Exhibit 8** is true and correct  
4                   copy of a screenshot I took on October 30, 2023, which accurately depicts the  
5                   instructions I followed from Google’s online Search Console Help page at:  
6                   [https://support.google.com/webmasters/answer/9008080?sjid=123280206765](https://support.google.com/webmasters/answer/9008080?sjid=12328020676522628568-NA#zippy=%2Cdomain-name-provider%2Cmanual-domain-name-provider-instructions)  
7                   22628568-NA#zippy=%2Cdomain-name-provider%2Cmanual-domain-  
8                   name-provider-instructions.

9                   18. Once I verified my identity as the domain owner to Google (through  
10                  the TXT record) in 2021, it linked my email address (iristheangel@gmail.com) to all  
11                  domain-related services such as Google Webmaster Central and Google Search  
12                  Console, which used to be separate but have since been combined (collectively the  
13                  “Google Tools”), for single sign-on access. After this happened, I was not required  
14                  to enter any special administrative credentials beyond simply signing into my own  
15                  Google account since Google recognized me as the domain owner. And my login  
16                  credentials to my Google account are automatically stored (i.e., “cached”) in the  
17                  Google Chrome browser which I am always signed into, meaning that I do not need  
18                  to enter them to access the Google Tools for any of my domains.

19                  19. At the first meeting of the BCS board of directors, Whiteley, Hughes,  
20                  and Magill, were made interim board members, to serve temporarily without  
21                  compensation until we could find qualified replacements. I was accidentally added  
22                  as a board member due to an error on the original paperwork filed through Legal  
23                  Zoom. Hughes later requested that I not resign and remain on the board and I  
24                  reluctantly agreed. A fifth, permanent, board member, Bill Boyles, was later added  
25                  to the BCS board of directors in May 2021.

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1           20. In April 2021, Hughes purchased the .Com Domain from Joshua  
2 Scarpuzzi. A true and correct copy of the April 6, 2021, Assignment and License  
3 Back Agreement between BCS and Joshua Scarpuzzi, which I voted in favor of as a  
4 member of BCS’s board of directors, is attached to the Index of Exhibits as **Exhibit**  
5 **9**. The .Com Domain was specifically purchased for BCS’s use, and the transaction  
6 was supported by an executed assignment agreement and consideration. Based on  
7 these facts, after the assignment, I understood that BCS legally owned the .Com  
8 Domain.

9           21. Whiteley and I were the only two directors on BCS’s board who  
10 identified as LGBTQ+. Almost immediately after BCS was formed, tension started  
11 developing between the members of the board when Hughes (who was the President  
12 and CEO) regularly hurled insults and homophobic epithets at Whiteley during  
13 meetings (including BCS board meetings), telephone calls, Zoom conferences, and  
14 on BCS’ private Slack channel in the Breaking Code Silence workspace. Among  
15 other things, I witnessed Hughes refer to Whiteley as a “mangina” and a “queen,”  
16 and I also witnessed Hughes refer to Whiteley as having “female energy.”

17           22. Whiteley and several others made complaints about Hughes’ behavior,  
18 but BCS management ignored Hughes’ conduct. After only three months of  
19 involvement with BCS, Whiteley resigned from BCS’ board of directors on June 26,  
20 2021.

21           23. Immediately after the board of directors received Whiteley’s notice of  
22 resignation, Hughes began pressuring myself and the other members of the board of  
23 directors to sue Whiteley. When Bill Boyles and I explained to Hughes that BCS did  
24 not have a reason to sue Whiteley, Hughes asked us to “brainstorm” up a reason to  
25 sue Whiteley. Bill Boyles and I refused. Because I was not proficient with  
26 WordPress at the time of Whiteley’s resignation, based on Hughes and Magill’s  
27 paranoia and the misinformation they were feeding the board, I was initially  
28 concerned that Whiteley might be able to access and interfere with the BCS website.





1 That concern was ultimately unfounded and Whiteley fully cooperated with the  
2 efforts to turn over and relinquish his access to BCS’s accounts. Whiteley’s  
3 relinquishment of his access to all of BCS’s accounts following his resignation is  
4 addressed in detail below in Paragraph 46.

5 24. Beginning July 4, 2021, I had very little contact with Whiteley until  
6 March 2022. Although we spoke sporadically in that time period, none of our  
7 conversations involved gaining unauthorized access to any BCS account or  
8 computer. Other than my conversations with Whiteley on March 11<sup>th</sup> or 12<sup>th</sup> as  
9 described below, prior to learning of this lawsuit, Whiteley and I never privately  
10 discussed anything about any of the accounts/computers BCS is contending were  
11 hacked, and I did not assist anyone in unlawfully accessing, or exceeding authorized  
12 access, with respect to any BCS accounts or computers. Moreover, I never took any  
13 action which would cause or contribute to the deindexing of BCS’s website.

14 25. After Whiteley’s resignation in June 2021, Hughes’s harassment of gay  
15 volunteers did not stop. People started telling me that Hughes was making  
16 comments about my sexual orientation to new BCS volunteers – indicating that  
17 there was a “problem lesbian board member” (I was the only lesbian board member  
18 at that time). Hughes also increased her hostility towards me. This led to my  
19 decision to file a formal internal complaint against Hughes in November 2021 for  
20 harassment, retaliation, and discrimination. A true and correct copy of the  
21 November 26, 2021 Breaking Code Silence – Internal Complaint Form that I  
22 submitted is attached to the Index of Exhibits as **Exhibit 10**.

23 26. Shortly thereafter, I learned that Hughes and Magill were misusing  
24 grant funds and hiring employees without unrestricted funds to pay them. As the  
25 corporate Treasurer, I felt obligated to report this to the California Attorney General  
26 and advised Hughes and Magill of my intention. The hostility that resulted and the  
27 anti-LGBTQ+ culture at BCS forced me to resign from BCS on December 9, 2021.

28

1           27. On the evening of my resignation, Bill Boyles Jr. took affirmative steps  
2 to revoke my authorization to BCS's WordPress console by deleting my account. I  
3 have not logged into or otherwise accessed the BCS WordPress site since my  
4 resignation, nor do I have the ability to do so.

5           28. Within minutes of my resignation on December 9, 2021, my access to  
6 the kmcnamara@breakingcodesilence.org email account was revoked by someone at  
7 BCS and I could no longer access that account or any other BCS accounts that were  
8 linked to that email address. This includes BCS's Google Drive account, Cloudways  
9 account, paid Hootsuite account, PayPal account, and TikTok account.

10 Notwithstanding BCS's revocation of my access to these accounts, BCS never  
11 removed my credit card as the payment method for several BCS accounts, including  
12 the annual renewal payments on BCS's Hootsuite account. Hootsuite has continued  
13 to charge my personal credit card for BCS's account even after this litigation was  
14 filed. Specifically, my credit card was charged \$831 in May 2022 and \$2,988 in  
15 May 2023 for BCS's Hootsuite account, despite the repeated requests of my counsel  
16 to remove my credit card from all BCS accounts. I also continued to be charged for  
17 BCS's Cloudways web hosting from January to March 2022. But unlike Hootsuite, I  
18 was able to stop the Cloudways charges by working both with Cloudways Support  
19 and disputing the charges with my credit card company.

20           29. After my resignation, on December 15, 2021, Rebecca Moorman,  
21 Emily Carter, and I received an email from Jennifer Magill requesting that we each  
22 execute an Intellectual Property Assignment Agreement. A true and correct copy of  
23 the December 15, 2021, email I received from Jennifer Magill with the attached  
24 draft Assignment of Intellectual Property Agreement is attached to the Index of  
25 Exhibits as Exhibit 11. I never executed the Assignment of Intellectual Property  
26 Agreement and never otherwise transferred or assigned the .Org Domain to BCS.  
27 BCS has never paid any expenses associated with the .Org Domain, either directly  
28 or to me as reimbursement. After December 2021, BCS did not follow up with me

1 about the Assignment of Intellectual Property Agreement or otherwise ask me to  
2 turn over my .Org Domain to BCS. At no point after my resignation and prior to  
3 filing this litigation did BCS ever demand that I turn over my .Org Domain to BCS,  
4 or otherwise convey to me its belief that it owned my .Org Domain. Even the  
5 demand letters my attorney received from BCS's counsel in early 2022 never  
6 asserted that BCS owned the .Org Domain or demanded that I transfer the .Org  
7 Domain to BCS. A true and correct copy of the January 21, 2022, demand letter  
8 from DLA Piper to an attorney for another nonprofit that I volunteer for  
9 (Unsilenced), Andrew Morton, is attached to the Index of Exhibits as **Exhibit 110**.  
10 A true and correct copy of the February 23, 2022, demand letter from DLA Piper to  
11 Unsilenced's attorney, Andrew Morton, is attached to the Index of Exhibits as  
12 **Exhibit 111**.

13 30. After my resignation from BCS, BCS failed to take any affirmative  
14 steps to remove my access to its Facebook Business Page until January 4, 2022. To  
15 the best of my knowledge at the time of my resignation, both Jennifer Magill and  
16 Vanessa Hughes had administrative access to that account and could have removed  
17 me at any point. Regardless, since my resignation on December 9, 2021, I did not  
18 access or make any changes to BCS's Facebook Business Page.

19 31. After my resignation from BCS, BCS failed to take any affirmative  
20 steps to remove my access to its Google AdWords account or its Google Analytics  
21 Account until January 12, 2022, and March 6, 2022, respectively. A true and correct  
22 copy of the January 12, 2022, email notification I received stating that my access to  
23 Google Ads was revoked is attached to the Index of Exhibits as **Exhibit 12**. As set  
24 forth in the Declaration of Clark Walton filed concurrently herewith, I learned  
25 during the forensic expert inspection which I attended on June 26, 2023, that my  
26 access to BCS's Google Analytics account was revoked on March 6, 2022, by  
27 someone at BCS. Similarly, after my resignation, BCS failed to take any affirmative  
28 steps to remove my access to its Google for Nonprofits account. I accidentally

1 discovered that my personal Google account was still linked to BCS’s account on  
2 March 4, 2022 when I navigated to the Google for Nonprofits page to enroll a  
3 separate non-profit to this service. Google would not allow me to enroll another  
4 non-profit entity since my personal account was already linked to the Google For  
5 Nonprofits account for BCS. At that time, I removed the link to my personal Google  
6 account from BCS’s account. A true and correct copy of the email I received from  
7 Google for Nonprofits reflecting the revocation of my access to BCS’s Google for  
8 Nonprofits account is attached to the Index of Exhibits as **Exhibit 112**. Regardless,  
9 since my resignation on December 9, 2021, I did not access or make any changes to  
10 either of these Google accounts.

11 32. After my resignation from BCS, in January 2022, I learned that BCS  
12 attempted to have ownership of my UPS Box transferred out of my name. I  
13 originally rented the UPS Box on August 3, 2021, after someone posted my home  
14 address on social media and my family and I started getting dangerously harassed at  
15 home, forcing us to move. I thereafter used the UPS Box for my personal mail and  
16 because certain government forms related to BCS could not be sent to a P.O. Box, I  
17 also allowed BCS to use the UPS Box address to receive mail.

18 33. After my resignation, I was contacted by Jennifer Magill who inquired  
19 about the UPS Box. I told Magill that I pre-paid for the UPS Box for one year and  
20 would be happy to hand the UPS Box over to BCS if BCS would reimburse me for  
21 that cost. Magill never replied to this email. A true and correct copy of my January  
22 5-6, 2022, emails with Jennifer Magill are attached to the Index of Exhibits  
23 collectively as **Exhibit 13**.

24 34. Instead of reimbursing me, I was told by employees at the UPS Store  
25 that Hughes contacted the UPS Store on multiple occasions between January and  
26 March 2022, demanding that the UPS Store give her access to my UPS Box,  
27 accusing me (and the UPS employees) of committing “mail fraud,” and demanding  
28 that the UPS Store turn over any security footage of me entering and leaving the

1 UPS Store. When the UPS Store employees refused to comply with Hughes’  
2 demands, she threatened to sue the UPS Store and the individual employees. A true  
3 and correct copy of the April 12, 2022, statement I received from UPS Store  
4 employee Lisa Chen describing the foregoing events is attached to the Index of  
5 Exhibits as **Exhibit 14**. Ms. Chen told me that she requested that Hughes not call  
6 back again.

7 35. Also in January 2022, I discovered that someone was attempting to take  
8 over ownership of my Troubled Teen Industry archive that I had been working on  
9 since 2017 (organized on Zotero). Specifically, when I logged into my Zotero  
10 account on January 9, 2022, I discovered that my entire archive was missing from  
11 the account. Shocked, I contacted the President/CEO of Zotero, who ultimately  
12 returned my archive to my account. A true and correct copy of my January 11, 2022,  
13 email exchange with the President of Zotero (which is a project of Digital  
14 Scholarship), Sean Takats, is attached to the Index of Exhibits as **Exhibit 15**. As  
15 shown in the email exchange, my Zotero library is publicly posted and BCS or  
16 anyone else is free to access it anytime.

17 36. Then, on March 11, 2022, I received an email from Google informing  
18 me that a BCS email address I did not recognize was added as an “owner” to the  
19 Google Tools for my .Org Domain. A true and correct copy of one of the Google  
20 Notifications I received on March 11, 2022 is attached to the Index of Exhibits as  
21 **Exhibit 113**. Panicked that someone was trying to steal my domain (like what had  
22 recently happened with my Zotero archive and UPS Box), on March 11, 2022, at  
23 about 2:15 PM PST (March 12, 2022, at 9:15 PM UTC)<sup>1</sup>, I used my own personal  
24

25 <sup>1</sup> UTC is a time zone standard used as a basis for all time zones worldwide. It is  
26 a constant time scale and does not change for Daylight Saving Time. UTC is 8 hours  
27 ahead of Pacific Standard Time.  
28

1 Google account (though iristheangel@gmail.com which was automatically stored,  
2 i.e. “cached,” in my Chrome browser) to browse to the Google Webmaster Central  
3 webpage, and give Whiteley at jeremy@medtexter.com “ownership” permissions  
4 for the .Org Domain by clicking on the “Manage Users” button. The permissions I  
5 granted would allow Whiteley to log into his Google account and browse to the page  
6 to see the activity related to my .Org Domain. I added Whiteley so he could witness  
7 what was happening to the domain in real time and perhaps even explain it to me  
8 since I had limited experience with the Google Tools at the time. After adding  
9 Whiteley, I phoned him and explained what happened.

10 37. By way of explanation, Google Search Console (formerly known as  
11 Google Webmaster Central) is a free service that Google provides to domain owners  
12 and webmasters so that they can monitor how their site interacts with Google,  
13 measure site traffic, and troubleshoot any issues. Anyone that owns domains that are  
14 indexed on Google can have an account. In March 2022, Google Webmaster Central  
15 and Google Search Console were different, but related, services. In late July 2023,  
16 Google consolidated both services into Google Search Console. Google Tools are  
17 accessible by logging into one’s Google account, which is usually the same as one’s  
18 Gmail address. When logged into one’s Google account, navigating to the  
19 <https://search.google.com/search-console/> permits one to access the Google Search  
20 Console features for domains that the particular Google account is permitted access.  
21 From my personal Google account, I can sign onto Google Tools (using my  
22 automatically saved login for iristheangel@gmail.com) and view activities and any  
23 problems with all of the domains that I either own or have permissions to access,  
24 including my network-node.com domain which I own and use for work, and the  
25 unsilenced.org domain which I monitor with the permission of the domain owner. I  
26 also access my .Org Domain through my personal Google account.

27  
28

1           38. What I provided to Whiteley on March 11, 2022, was administrative  
2 permissions to the .Org Domain *through my own Google account* so that he could  
3 see the activity related to the .Org Domain. Because I am the person who (1)  
4 registered the .Org Domain and (2) paid for the domain for more than 3 years, the  
5 .Org Domain is one of the domains that I have access to through *my own Google*  
6 *account*. As the owner of the domain, I have top-level privileges to the Google  
7 service to administer to my domain and, as that system owner, can grant privileges  
8 to the service or revoke them as needed. The only reason BCS even has access to the  
9 Google Tools for the .Org Domain through its own Google Tools account is because  
10 *I specifically granted BCS permission to access it* by pointing the .Org Domain to  
11 BCS's webserver while I was a BCS volunteer/director, which allowed BCS to be  
12 authorized.

13           39. Over the years, I pointed the .Org Domain to various websites that  
14 supported the anti-TTI movement, including [wwaspsurvivors.com](http://wwaspsurvivors.com) and even  
15 [breakingcodesilence.net](http://breakingcodesilence.net) (years before the .Net Domain was owned by BCS).  
16 Although I could do so as the domain owner at any time, I never re-directed the .Org  
17 Domain to any other website (other than BCS's website) after my resignation or  
18 revoked BCS's privileges with respect to the .Org Domain, initially because I  
19 wanted to give BCS some time to migrate off of the .Org Domain onto its own .Com  
20 Domain, and later because of this litigation. I elected to maintain the status quo until  
21 this action could be resolved, resulting in BCS using my .Org Domain without  
22 paying anything for it for more than two years since my resignation.  
23 Notwithstanding, I have always understood and believed, and still believe, that I  
24 own the .Org Domain and that, as the domain owner, I was entitled to delegate  
25 ownership permissions to Whiteley, or anyone else I chose.

26           40. Almost immediately after I added Whiteley's email,  
27 [jeremy@medtexter.com](mailto:jeremy@medtexter.com), on March 11, 2022, someone revoked his access. Then, I  
28 re-added Whiteley's email, and someone again revoked the access. This went back-

1 and-forth several times over a couple of days. Assuming that it was a BCS volunteer  
2 who did not realize that he or she was intruding on my domain, I tried to alert the  
3 person by granting administrative permissions to ridiculous email addresses like  
4 thisisnotyourdomainpleasestop@gmail.com. Unfortunately, because  
5 thisisnotyourdomainpleasestop@gmail.com was not an actual email address at the  
6 time, it would not work. So instead, I granted administrative permissions to  
7 comments@whitehouse.gov (which I determined to be an actual email address) in  
8 an effort to get the intruder's attention and knowing I could quickly revoke the  
9 access so no one from that email address would access the Google Tools.

10 41. On March 12, 2022, I also learned through my domain registrar,  
11 Hover.com, that Jesse Jensen, a representative of BCS who was unknown to me at  
12 the time, was attempting to access my personal Hover account (that I have  
13 maintained since 2016) to try to hijack the .Org domain. A true and correct copy of  
14 the March 12, 2022, notification I received from Richard at Hover Support is  
15 attached to the Index of Exhibits as **Exhibit 16**.

16 42. Other than adding the email addresses to the Google Tools for my .Org  
17 Domain as described above, I took no action whatsoever with respect to the .Org  
18 Domain or BCS's website. Specifically, I did not request that the BCS website be  
19 deindexed in March 2022, or any other time, I did not change or alter any portion of  
20 BCS's website after my resignation, and I did not aid or assist anyone else in doing  
21 such things. Notably, it is not possible to deindex a website from Google Search  
22 directly through a Hover domain registrar account.

23 43. After my resignation, BCS never requested that I transfer the .Com  
24 Domain that BCS purchased from Joshua Scarpuzzi out of my Hover domain  
25 registrar account. In an effort to assist BCS in migrating off of my .Org Domain, I  
26 created a separate Hover domain registrar account for the .Com Domain when I  
27 discovered it was still housed in my Hover.com account and I authorized my  
28 attorney to reach out to BCS's counsel and provide BCS with the login credentials



1 for the separate Hover account. On March 18, 2022, my attorney, Mandana  
2 Jafarinejad, sent a letter to DLA Piper requesting that BCS migrate its website to the  
3 .Com Domain within ten days. A true and correct copy of the March 18, 2022 letter  
4 from Mandana Jafarinejad to Hector Corea of DLA Piper is attached to the Index of  
5 Exhibits as **Exhibit 17**. Thereafter, on March 24, 2022, my attorney forwarded the  
6 administrative credentials to the separate Hover account for the .Com Domain  
7 (which were inadvertently omitted from the original letter) to DLA Piper via email.  
8 A true and correct copy of the March 24, 2022 email from Ms. Jafarinejad to Mr.  
9 Corea is attached to the Index of Exhibits as **Exhibit 18**. Aside from moving the  
10 .Com domain into a separate Hover.com account and providing BCS with the login  
11 credentials for the account, I took no other action with respect to the .Com domain  
12 and made no changes to its configuration.

13 44. Rather than migrating its website to its own .Com Domain within ten  
14 days as requested, on March 28, 2022, BCS/DLA Piper filed this lawsuit, falsely  
15 alleging that Whiteley and I accessed numerous BCS accounts without  
16 authorization, or exceeded authorized access to such accounts. The Complaint  
17 alleges that the BCS website was not appearing on a Google Search and that  
18 allegedly someone made a request to deindex the BCS website from Google Search  
19 on March 10. I did not have anything to do with any deindexing request and I was  
20 completely unaware of these allegations when I added Whiteley's email address to  
21 the Google Tools for my .Org Domain on March 11, 2022, after the alleged  
22 deindexing request was made. I only learned of these deindexing allegations for the  
23 first time when I read the Complaint.

24 45. No one accessed the Hover.com domain registrar account I created for  
25 BCS to house the .Com Domain until December 2022. I would have received an  
26 alert from Hover if anyone accessed the account and I never received one. Then, on  
27 November 20, 2022, I received a notification from Hover that the .Com Domain was  
28 coming up for renewal in 30 days. A true and correct copy of the email notification I

1 received from Hover is attached to the Index of Exhibits as **Exhibit 19**. As  
 2 described in the Declaration of Catherine Close filed concurrently herewith, I  
 3 immediately forwarded the email to my attorney, who immediately advised BCS’s  
 4 attorneys at DLA Piper of the impending renewal of the .Com Domain. On  
 5 December 12, 2022, BCS (through its counsel) confirmed that it successfully moved  
 6 the .Com Domain to its own domain registrar account.

7 46. I am aware that BCS previously made allegations regarding  
 8 unauthorized access into numerous accounts. Even though many of those accounts  
 9 are no longer at issue in the case, it is important to note that, after his resignation,  
 10 Whiteley went above and beyond to accommodate and assist BCS in transferring to  
 11 BCS ownership and administrative credentials to the BCS accounts he had either set  
 12 up or had access to. Therefore, I believe the following account of my assistance with  
 13 some of those transfers and, my contemporaneous awareness of the following  
 14 transfers as a member of the board of directors at the time, is important:

15 a. WordPress: WordPress is a content management software that is  
 16 installed on a server. It is the application that provides the public-facing  
 17 website for BCS. This is not to be confused with a domain – which is a  
 18 separate, intangible, property which can point to any website or webserver  
 19 that the owner of that domain wishes. During our times as volunteers,  
 20 Whiteley and I had administrative access to the BCS WordPress Website for a  
 21 period of time. After his resignation in June 2021, I took affirmative steps to  
 22 revoke Whiteley’s authorization to the BCS WordPress website in late June  
 23 2021 by changing his permissions from “Administrator” to “None” on the  
 24 WordPress website, and Bill Boyles changed the email address for Whiteley’s  
 25 WordPress account on July 9, 2021. A true and correct of the July 9, 2021  
 26 email notification I received in the jwhiteley@breakingcodesilence.org inbox  
 27 that I had access to after Whiteley’s resignation is attached to the Index of  
 28 Exhibits as **Exhibit 20**. I am unaware of Whiteley gaining any access to BCS’

1 WordPress website after I revoked his authorization in June 2021.

2 b. Domains: A domain name is a human-friendly address,  
3 sometimes called a URL (Uniform Resource Locator) or web address.  
4 Domains are created to make Internet Protocol (IP) addresses more accessible  
5 and easier to remember. Domains can be pointed towards websites,  
6 applications, servers, etc. It should be noted that a domain is different and  
7 distinguishable from a website. A domain is to a website like a street address  
8 is to a house. Domains direct internet users to the website, host, application,  
9 or document that they point to. Domains are purchased and reside in domain  
10 registrar accounts such as Hover.com, which is what I use.

11 i. *The breakingcodesilence.com domain (the “.Com*  
12 *Domain”)*: The .Com Domain was transferred from Josh Scarpuzzi’s  
13 personal domain registrar account into my own personal Hover.com  
14 domain registrar account in April 2021 after BCS purchased the  
15 domain from Scarpuzzi. As described in detail above, after my  
16 resignation, I transferred the .Com Domain out of my personal  
17 Hover.com account into a new Hover.com account and my attorney  
18 gave BCS’s counsel the credentials for this new Hover.com account so  
19 that BCS could take possession of the .Com Domain and put it into its  
20 own domain registrar account (or just keep it in the new account I  
21 created for the domain). Whiteley has never had access to my personal  
22 Hover.com account or the second Hover.com account that I created for  
23 BCS to house the .Com Domain.

24 ii. *The breakingcodesilence.org domain (the .Org Domain)*:  
25 At all times since I registered the .Org Domain, it has been housed in  
26 my personal Hover.com domain registrar account. I have maintained  
27 this Hover.com account since 2016 and it has housed over a dozen  
28 different domains that I use for non-BCS-related business and personal

1 use. Attached collectively to the Index of Exhibits as **Exhibit 21** are  
2 true and correct copies of my receipts from Hover.com for some of my  
3 other domains that have been housed in my Hover.com domain  
4 registrar account dating back to 2016. I have never granted Whiteley  
5 any access to my personal Hover.com domain registrar account where  
6 all of my domains, including the .Org Domain, are housed, and I have  
7 received no information or alerts that would suggest that Whiteley ever  
8 accessed my Hover.com domain registrar account.

9 iii. During the course of this litigation, I have heard BCS refer  
10 to my Hover.com account as a “DNS account.” This is inaccurate.  
11 Hover sells domains. The Hover.com domain registrar account is not a  
12 “DNS account,” it is an account that houses intangible domain name  
13 properties. DNS stands for “Domain Name System.” DNS is a  
14 configuration on a domain that translates a domain name into an IP  
15 address. The only DNS service that Hover.com provides is basic  
16 configuration of DNS for domains that you own. As explained above,  
17 my Hover.com domain registrar account houses over a dozen domain  
18 names that I have purchased from Hover over the years as far back as  
19 2016 for personal and non-BCS business related use.

20 c. BCS’ Google Drive Account: BCS uses Google Drive to share  
21 documents internally and externally. During my time at BCS, documents  
22 were housed both on various personal Google Drives as well as BCS’ Google  
23 Drive. The majority of Whiteley’s access to BCS’ Google Drive folders/  
24 drives were linked to his BCS email address,  
25 jwhiteley@breakingcodesilence.org. After his resignation from BCS, in late  
26 June 2021, I revoked Whiteley’s authorization to the  
27 jwhiteley@breakingcodesilence.org email account.  
28

- 1           d.     Google Search Console/Google Webmaster Central:
- 2           i.     *For the .Com Domain:* After BCS’s purchase of the .Com
- 3     Domain, it largely went unused while BCS was engaged in litigation
- 4     over the .Net Domain. For that reason, Google Tools was never set up
- 5     for the .Com Domain during my tenure at BCS. Thus, neither Whiteley
- 6     nor I have ever had access to the Google Tools for the .Com Domain.
- 7           ii.    *For the .Org Domain:* As discussed in greater detail
- 8     above, as the owner of the .Org Domain, Google recognizes me as the
- 9     system owner for the .Org Domain. For the reasons discussed above, on
- 10    the evening of March 11, 2021, I added Whiteley’s email address,
- 11    jeremy@medtexter.com to the Google Tools for the .Org Domain,
- 12    without his prior knowledge, by clicking the “+” (addition) button on
- 13    my Google account dashboard and adding his email address. Whiteley
- 14    took no affirmative action to grant himself authorization to the Google
- 15    Tools for the .Org Domain.
- 16           e.     Google AdWords Account: Google provides \$10,000 of free ad
- 17    credits to non-profits every month. This allows non-profits to direct traffic to
- 18    its website. Whiteley initially set up BCS’s Google AdWords Account on
- 19    June 7, 2021. On June 30, 2021, Whiteley transferred administrative control
- 20    of this account to me. Thereafter, on July 19, 2021, I took affirmative steps to
- 21    revoke Whiteley’s authorization to access this account by removing his email
- 22    address as a user. Whiteley has had no access to this account since I revoked
- 23    his authorization on July 19, 2021.
- 24           f.     Google Analytics: Google Analytics is a web analytics service
- 25    offered by Google that tracks and reports website traffic and also mobile app
- 26    traffic and events. Google gains this visibility into visitor traffic through a
- 27    Google Analytics tag that is embedded into the source code of the WordPress
- 28    Website. Whiteley initially set up the Google Analytics account for BCS and

1 embedded the linked tag in April 2021. After his resignation, on August 18,  
2 2021, I took affirmative steps to revoke Whiteley's authorization by deleting  
3 his email from this service. Attached to the Index of Exhibits as **Exhibit 22** is  
4 a screenshot which was produced by BCS in discovery in this action and  
5 Bates stamped BCS\_0577327 which reflects my (irisheangel@gmail.com)  
6 changing of Whiteley's authorization on the account to none on August 18,  
7 2021. After his resignation, Whiteley made no changes to the Google  
8 Analytics account and he has not had access to the BCS Google Analytics  
9 account since I revoked his access.

10 g. @BreakingCodeSi1 Twitter Account: This Twitter account was  
11 created and managed by Rebecca Moorman in early 2020, more than a year  
12 prior to BCS's formation. To my knowledge, the email address associated  
13 with this account was never a Breaking Code Silence email address.  
14 Moorman permitted BCS to use this Twitter account for a period of time in  
15 2021 when she was a BCS volunteer. However, Moorman expressly refused  
16 to transfer the Twitter account to BCS. Attached to the Index of Exhibits as  
17 **Exhibit 23** is a true and correct copy of the December 15, 2021, email from  
18 Moorman to BCS, on which I was copied, indicating Moorman's refusal to  
19 assign her intellectual property to BCS. To the best of my knowledge,  
20 Whiteley only had administrative access to Moorman's Twitter account for a  
21 very short period of time in April 2021, and has had no administrative access  
22 to Moorman's Twitter account after his resignation from BCS.

23 h. Original Paid Hootsuite Account: Hootsuite is a social media  
24 management tool with features to help with planning, scheduling, and  
25 syndicating social posts. Key features include automatic scheduling, social  
26 media monitoring, performance reporting, basic task management and more.  
27 In April 2021, I set up a nonprofit paid Hootsuite account for BCS using my  
28 own credit card. This Hootsuite account was linked to my

1 kmcnamara@breakingcodesilence.org email address and required access to  
2 that email address to perform the necessary two-factor authentication to login.  
3 Whiteley had access to this Hootsuite account for a short period of time while  
4 he was a volunteer at BCS. Even though he could not login to this account  
5 without the two-factor authentication, I took the additional affirmative step to  
6 revoke his authorization by changing the password on the account at the time  
7 of his resignation. Since that time, Whiteley has had no access to the paid  
8 Hootsuite account.

9 i. Zotero: As discussed above, Zotero is a free, easy-to-use tool to  
10 help you collect, organize, annotate, cite, and share links and bibliography  
11 data. During my time as an activist, I have had several Zotero accounts. I use  
12 Zotero to organize links to documents on my personal Google Drive and news  
13 stories related to the TTI. Importantly, my Zotero libraries do not store any  
14 documents, they just have just links to wherever the documents are housed. I  
15 started collecting documents for a survivor archive in 2017 and created my  
16 first Zotero account with the username kmcnamara013. I later created a  
17 second public Zotero account that I allowed BCS and many others to publicly  
18 link to. This Zotero account has always been registered to my personal email.  
19 At no time has Whiteley ever had administrative access or authorization to  
20 any of my Zotero accounts.

21 j. Instagram:

22 i. *@breakingcodesilence Instagram Account*: This Instagram  
23 account was created by Rebecca Moorman in early 2020. Access to this  
24 account was lost in early March 2021 prior to the incorporation of BCS  
25 due to losing access to the phone number that was provided for two-  
26 factor authentication. To the best of my knowledge, Whiteley has never  
27 had access to this Instagram account.  
28

1                   ii.     @*breakingcodesilenceofficial* Instagram Account: This  
2                   account was created for BCS by Hannah Kay in or about July 2021, and  
3                   registered to the email info@breakingcodesilence.org. I, as well as  
4                   many people on BCS’ social media team, had access to this Instagram  
5                   account from July 2021 to December 9, 2021 when I resigned. To the  
6                   best of my knowledge, Whiteley has never had access to this Instagram  
7                   account because it was created after his resignation from BCS.  
8                   Regardless, BCS has continued to post on this Instagram account since  
9                   the start of this litigation, so BCS retains control of this account.

10                  k.     Facebook Group: Facebook Groups are spaces on the Facebook  
11                  social media network for friends, acquaintances, or people with similar  
12                  interests to discuss or share about broad or narrow topics. This Facebook  
13                  group was originally created by Emily Carter in May 2019 and titled  
14                  “Program Legislation Change.” Carter created this group prior to our  
15                  collaboration or even the decision to create a social media campaign. This  
16                  Facebook group has gone through five name changes from inception. Carter  
17                  was an administrator of this group throughout 2019 to present day. At one  
18                  point in time, Carter added many Breaking Code Silence volunteers,  
19                  including me, as administrators of this Facebook group. At one point,  
20                  Whiteley was added as an administrator of this Facebook group but, as set  
21                  forth in his declaration, he took affirmative steps to revoke his own access by  
22                  removing himself as an administrator. To the best of my knowledge, Whiteley  
23                  was never re-added as an administrator of the Facebook group.

24                  l.     YouTube: Whiteley set up this brand YouTube account for BCS  
25                  in April 2021. At the time, he added my email address as another “owner” on  
26                  this YouTube account. After his resignation, I noticed that Whiteley’s email  
27                  was still listed as the “Primary Owner” on the YouTube account. I took the  
28                  affirmative steps to revoke his authorization at that time by clicking on the



1 downward arrow next to my own email address and changing my role to the  
2 “Primary Owner” of the YouTube account. After that, I removed Whiteley’s  
3 email address from the account. To the best of my knowledge, Whiteley has  
4 never had access to the YouTube account after I revoked his authorization.

5 m. BCS TikTok – Whiteley created this TikTok account for BCS in  
6 April 2021. On April 18, 2021, Whiteley texted me the credentials for the  
7 TikTok account and informed me that he changed the two-factor  
8 authentication and primary communication method for the TikTok account to  
9 my kmcnamara@breakingcodesilence.org email. True and correct copy of my  
10 April 18, 2021 chat messages with Whiteley regarding the credentials for the  
11 TikTok account are attached to the Index of Exhibits as **Exhibit 24**. After  
12 Whiteley’s resignation, I took the extra affirmative step of revoking his  
13 authorization by changing the password on the TikTok account, even though  
14 he could not login without access to my email for two-factor authentication.  
15 To the best of my knowledge, Whiteley has not gained, and could not gain,  
16 administrative access to this TikTok account after April 2021.

17 n. BCS Email Addresses:

18 i. *jwhiteley@breakingcodesilence.org email*: Whiteley had  
19 access to this email address until the time of his resignation. After his  
20 resignation, I took affirmative steps to revoke his authorization by changing  
21 the password on the account. To the best of my knowledge, Whiteley has not  
22 accessed this account since his resignation.

23 ii. *info@breakingcodesilence.org email*: Whiteley may have  
24 briefly had access to this email account during his time as a BCS  
25 volunteer/director. As a precautionary security measure, I changed the  
26 password on this email account on June 28, 2021, shortly after Whiteley’s  
27 resignation. To the best of my knowledge, Whiteley has never even logged  
28 into this email account.

1                   iii.     After Whiteley’s resignation, all BCS email accounts were  
2 moved from the Hover email inboxes to free Google inboxes which Whiteley  
3 never had access to.

4                   o.     BCS Facebook Business Account and Page: A Facebook  
5 Business Page is a public social media profile designed for commercial  
6 organizations. Like a personal Facebook account, Facebook businesses pages  
7 allow you to make connections online. Brands use their Facebook pages to  
8 promote products and services through links, status updates, photos, and  
9 videos. Whiteley initially set up BCS’s Facebook Business page in early  
10 2021. As described in his declaration, after his resignation, Whiteley took the  
11 affirmative steps to revoke his own authorization by removing himself as an  
12 administrator. A true and correct copy of the email that Whiteley forwarded to  
13 me on June 28, 2021, informing me that he had removed himself from the  
14 Facebook Business Page is attached to the Index of Exhibits as Exhibit 25.  
15 To the best of my knowledge, Whiteley never re-gained access to the  
16 Facebook Business Page after affirmative steps were taken to revoke his  
17 authorization.

18                   p.     Google for Nonprofits: Whiteley originally helped set up BCS’s  
19 Google for Nonprofits account in May 2021. After his resignation, Whiteley  
20 took affirmative steps to revoke his own authorization by removing his email  
21 address from the administrator list. To the best of my knowledge, Whiteley  
22 did not regain access to BCS’ Google for Nonprofits account after his  
23 resignation.

24                   q.     Slack: Slack is a cloud-based cross-platform instant messaging  
25 service. Whiteley was granted access to BCS’s Slack in March 2021. As set  
26 forth in his declaration, at the time of his resignation, Whiteley took the  
27 affirmative steps to remove his own authorization by de-activating his own  
28 account. To the best of my knowledge, Whiteley never regained access to the

1 BCS Slack after he removed himself.

2 47. On June 26, 2023, I attended the forensic expert inspection of BCS's  
3 accounts performed by Clark Walton. While attending the inspection, I witnessed  
4 Mr. Walton review the Google Search Console. Based on the information I observed  
5 from the Google Search Console, it appeared that there was a drop in search-related  
6 queries on or around March 9 or 10, 2022, but the search-queries started resuming  
7 their typical number of "clicks" and "impressions" on or around March 11, 2022.  
8 This indicates that it was a small amount of time that the domain was either  
9 deindexed or that Google was not tracking "clicks" and "impressions" from Google  
10 Search results. However, when Mr. Walton inspected the Google Analytics console,  
11 a separate system that tracks traffic directly on the webserver itself via a plugin  
12 installed on WordPress, it appeared that the traffic dropped on March 12 – after the  
13 alleged de-indexing had been resolved – and stopped being tracked entirely for the  
14 remainder of March 2022 on the Google Analytics system. The only explanation for  
15 this is that BCS was altering the Google Site Plugin on their WordPress site, which  
16 affected BCS's ability to accurately track traffic, either around the time of the  
17 alleged deindexing or shortly after. Thus, it is impossible to know whether BCS lost  
18 web traffic because they stopped tracking their traffic analytics, which I witnessed  
19 during the expert inspection.

20 48. With respect to BCS's alleged damages, BCS recently claimed during  
21 the deposition of its 30(b)(6) witness that it was anticipating a dramatic spike in  
22 donations at the time of the alleged deindexing by comparing the donations BCS  
23 received on other occasions in the past, none of which are comparable to the 30-  
24 second placard showing BCS's website after the conclusion of the after-show  
25 special that aired following the March 12 Lifetime show "Cruel Instruction."

26 a. In October 2021, while I was BCS's CFO and member of the  
27 board of directors, BCS representatives and volunteers participated in a  
28 weeklong visit to Washington DC doing interviews with major media outlets

JULANDER BROWN  
& BOLLARD  
JB

1 along with celebrities and politicians. This generated an enormous amount of  
2 articles and primetime media mentions of BCS. This resulted in a spike in  
3 traffic to the website during that week. Based on that entire week of media  
4 exposure, BCS received approximately \$1,690.00 through its PayPal link on  
5 its website during that week. Separately, BCS was also holding a 5K run  
6 fundraiser in October 2021 which BCS never advertised on its website,  
7 instead only through social media. BCS received approximately \$3,655.00 in  
8 donations through that Givebutter 5K Fundraiser.

9 b. On November 11, 2021, while I was BCS’s CFO and member of  
10 the board of directors, Paris Hilton (also a TTI survivor) got married. During  
11 her wedding, she informed her wedding guests that they may donate to BCS  
12 in lieu of a wedding present. This led to BCS receiving approximately  
13 \$2,111.21 in donations on and around November 11 and 12, 2021 through its  
14 website/PayPal account.

15  
16 I hereby declare under penalty of perjury under the laws of the United States  
17 of America that the foregoing is true and correct.

18  
19 DATED this 23 day of February 2023.

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21 \_\_\_\_\_  
22 KATHERINE MCNAMARA  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd of February 2024, I electronically filed the foregoing paper(s) with the Clerk of the Court using the ECF system which will send notification to all parties of record or persons requiring notice.

*/s/ Helene P. Saller*

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Helene P. Saller

