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

ANDY NGO,

Plaintiff,

v.

ROSE CITY ANTIFA, an unincorporated
association; BENJAMIN BOLEN, an
individual; JOHN HACKER, an individual;
CORBYN (KATHERINE) BELYEA, an
individual; JOSEPH CHRISTIAN EVANS,
an individual; MADISON LEE ALLEN, an
individual; DOES 1-50,

Defendants.

Case No.: 20CV19618

**DECLARATION OF ANDY NGO IN
SUPPORT OF PLAINTIFF'S
OPPOSITION TO BENJAMIN BOLEN'S
SPECIAL MOTION TO STRIKE**

I, Andy Ngo, declare as follows:

1. I am over the age of 18 and competent to testify as to all matters included herein.
2. I base this affidavit on my personal knowledge, experiences, information, and belief.
3. I am an adult resident of Portland, Oregon and an independent journalist who covers political news stories throughout the United States.
4. I filed this lawsuit for the exclusive purpose of seeking redress for the injuries sustained as a result of multiple, violent attacks, including the May 1, 2019 attack when Benjamin Bolen punched me in the stomach while outside the ICE detention center located at 4310 S. Macadam Avenue in downtown, Portland.
5. The attack placed me in imminent apprehension of a harmful contact, and for good reason—the harmful contact occurred, and I sustained injuries as a result of being struck in the stomach. I had no injuries at the time of being punched; however, I began experiencing pain

1 October 2017, I had less than 4,000 followers on Twitter. The attacks began because I shed light on
2 Antifa’s criminal activities. The purpose of my online journalism is to inform and protect the public.

3 14. I do not publish information online for white nationalist groups to consume, to
4 garner attention for the purpose of raising money, or post information about individuals because of
5 disagreement towards their political views. I do not engage in stochastic terrorism or demonize the
6 left. I post accurate information based on observations, arrests, and personal knowledge about
7 Antifa and its members.

8 15. I have never publicized any information with any ill intent. The reason I post
9 photographs of arrestees is because the residents of Portland should be aware of individuals with
10 dangerous, violent propensities and such awareness is critical to their well-being. All information I
11 post are accurate and true to the best of my information, knowledge, and belief, and I do not engage
12 in any deceptive editing or manipulative tactics regarding the video footage I produce.

13 16. Portland-based Rose City Antifa is one of the nation’s largest Antifa cells. Many of
14 its members commit crimes; however, very few arrests have been made in comparison to the
15 number of such crimes committed, and the overwhelming majority of those arrested are released
16 without bail and the charges are almost always dropped.

17 17. I have never been a member of any “white nationalist” group or affiliated with any
18 “white nationalist” group or organization. In fact, I am not white – I am of east Asian heritage.

19 18. I have never appeared at a rally in an effort to dox leftists nor have I ever targeted
20 anyone with a story because of their personal beliefs, nor have I ever published an article with the
21 intent to incentivize harassing, threatening, or violent behavior. I denounce all forms of violence
22 and criminal harassment, regardless of political ideology.

23 19. Rather, I have been attacked on numerous occasions. Antifa has threatened my well-
24 being, the well-being of my family, and have sent hundreds of death threats to me in various forms,
25 including direct messages, in writing, and even physically appearing at my home and attempting to
26 break in. I do not feed off of this attention.

1 20. The sole purpose of this action is to seek redress for the physical injuries I sustained
2 during the attacks articulated in the Complaint. Defendant is included in this action for one reason:
3 Defendant Benjamin Bolen struck me in the stomach and caused me to sustain physical and mental
4 injuries.

5
6 I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE AND ACCURATE TO
7 THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF, AND I UNDERSTAND
8 THAT THIS DECLARATION IS MADE FOR USE AS EVIDENCE IN REGARD TO CIVIL
9 ACTION NO. 20CV19618 AND IS SUBJECT TO THE PENALTIES FOR PERJURY.

10 Dated, this 3rd day of October, 2020.

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DocuSigned by:
Andy Ngo

ANDY NGO 3A5FA6790BD942F...

CERTIFICATE OF SERVICE

1
2 I, Carole Caldwell, hereby declare under penalty of perjury under the laws of the State of
3 Oregon that the following facts are true and correct:

4 I am a citizen of the United States, over the age of 18 years, and not a party to or interested
5 in the within entitled cause. I am an employee of Murphy & Buchal LLP and my business address
6 is 3425 SE Yamhill Street, Suite 100, Portland, OR 97214.

7 On October 5, 2020, I caused the following document to be served:

8 **DECLARATION OF ANDY NGO IN SUPPORT OF PLAINTIFF'S OPPOSITION TO**
9 **BENJAMIN BOLEN'S SPECIAL MOTION TO STRIKE**

10 in the following manner on the parties listed below:

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/s/ Carole A. Caldwell