

**John Doe #4**

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18 \* *Pro Hac Vice Application Pending*  
 19 \*\* *Designated Counsel for Service*

20 **United States District Court**  
 21 **Eastern District of California**

<p>22 <b>ProtectMarriage.com, et al.,</b></p> <p>23 <i>Plaintiffs,</i></p> <p>24 <b>v.</b></p> <p>25 <b>Debra Bowen, et al.,</b></p> <p>26 <i>Defendants.</i></p>	<p>27 Case No. 2:09-CV-00058-MCE-DAD</p> <p>28 <b>DECLARATION OF [REDACTED]</b>  <b>[REDACTED] IN SUPPORT OF</b>  <b>PLAINTIFFS' MOTION FOR</b>  <b>PRELIMINARY INJUNCTION</b></p> <p>Date: TBD  Time: TBD  Judge England</p>
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1 I, **REDACTED**, make the following declaration pursuant to 28 U.S.C. § 1746:

2 1. I am a resident of the state of California over 18 years of age, and my statements herein are  
3 based on personal knowledge.

4 2. I supported the passage of Proposition 8.

5 3. In support of the passage of Proposition 8, I donated **\$XX,XXX** to National Organization for  
6 Marriage California - Yes on 8.

7 4. I am unsure if this donation to National Organization for Marriage California – Yes on 8 was  
8 made in my name, or in the name of my business, the Law Offices of **REDACTED**. However, as  
9 I am the full shareholder of the Law Offices of **REDACTED**, this donation was made at my  
10 direction, out of my personal funds, and can be attributed to me.

11 5. In support of the passage of Proposition 8, I served as **REDACTED** for  
12 ProtectMarriage.com - Yes on 8, wrote articles supporting Proposition 8, and gave talks to local groups  
13 in support of Proposition 8.

14 6. On August **XX**, 2008, I held a fundraiser at my home to raise money for the  
15 ProtectMarriage.com - Yes on 8 campaign.

16 7. At this fundraiser, a group of protestors demonstrated at the entrance to my community. They  
17 attempted to pass out fliers to the guests of the fundraiser as they passed through the gate to my  
18 community, criticized support of Proposition 8 in general, and criticized me personally for my support  
19 of Proposition 8. True and correct accounts of this demonstration are contained in the news articles  
20 attached as Exhibit A.

21 8. On my law firm’s website, **REDACTED**, we provide a form for potential  
22 clients use to contact us.

23 9. From November 13-16, I received approximately 15-20 e-mails, containing threats and/or  
24 harassment, sent through the form located my firm’s website. For example, one e-mail states: “hello  
25 propogators & litigators burn in hell.” Another e-mail states: “Congratulations. for your support of  
26 prop 8, you have won our tampon of the year award. Please contact us is you would like to pick up your  
27 prize.” True and correct copies of these e-mails and several others sent through the form on our website  
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1 are attached as Exhibit B. I did not retain copies of all of the harassing and threatening e-mails that I  
2 received.

3 10. At least one e-mail I received via the form on my firm’s website referenced the amount I  
4 had donated in support of Proposition 8. The amount referenced in the e-mail also included a short-term  
5 loan that I made to ProtectMarriage.com – Yes on 8, which was reported by the California Secretary of  
6 State’s office.

7 11. My name, business, and the amount I donated were posted on the website  
8 www.californiansagainsthate.org.

9 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND  
10 CORRECT.

11 Executed on: **REDACTED**

**SIGNATURE REDACTE**  
**REDACTE**

1 **PROOF OF SERVICE**

2 I, Timothy D. Chandler, am over the age of 18 years and not a party to the within action. My  
3 business address is 101 Parkshore Drive, Suite 100; Folsom, California 95630.

4 On January 15, 2009, I electronically filed the foregoing document described as Declaration of  
5 John Doe #4 in Support of Plaintiffs' Motion for Preliminary Injunction, with the Clerk of Court using  
6 the CM/ECF system which will send notification of such filing to:

7 Zackery Paul Morazzini  
8 Zackery.Morazzini@doj.ca.gov  
9 *Attorney for Defendants Debra Bowen and Edmund C. Brown, Jr.*

10 And, pursuant to Rule 5-135(f), on January 15, 2009, I served the foregoing document  
11 described as Declaration of John Doe #4 in Support of Plaintiffs' Motion for Preliminary Injunction by  
12 placing true and correct copies of the documents in sealed envelopes with postage thereon fully  
13 prepaid, in the United States mail at Folsom, California, addressed to the following non-CM/ECF  
14 participants:

14 Dean C. Logan  
15 Office of the Registrar-Recorder  
16 12400 Imperial Highway  
17 Norwalk, California 90650

17 Department of Elections, City and County of San Francisco  
18 c/o Office of the Mayor Gavin Newsom  
19 1 Dr. Carlton B. Goodlett Place  
20 San Francisco, California 94102

20 Jan Scully  
21 Office of the District Attorney  
22 901 G Street  
23 Sacramento, California 95814

23 Eileen Teichert  
24 Office of the City Attorney  
25 New City Hall Building  
26 915 I Street, 4th Floor  
27 Sacramento, California 95814

27 Ross Johnson  
28 California Fair Political Practices Commission  
428 J. Street, Suite 620  
Sacramento, California 95814

1 Timothy Hodson  
2 California Fair Political Practices Commission  
3 428 J. Street, Suite 620  
4 Sacramento, California 95814

5 Eugene Huguenin, Jr.  
6 California Fair Political Practices Commission  
7 428 J. Street, Suite 620  
8 Sacramento, California 95814

9 Robert Leidigh  
10 California Fair Political Practices Commission  
11 428 J. Street, Suite 620  
12 Sacramento, California 95814

13 and

14 Ray Remy  
15 California Fair Political Practices Commission  
16 428 J. Street, Suite 620  
17 Sacramento, California 95814

18 *Defendants*

19 I declare under penalty of perjury under the laws of the State of California that the above is true  
20 and correct. Executed on January 15, 2009 at Folsom, California.

21 s/Timothy D. Chandler  
22 Timothy D. Chandler (CA Bar No. 234325)  
23 Attorney for Plaintiff  
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