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16 **UNITED STATES DISTRICT COURT**
17 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

18 EVA KNOTT,

19 Plaintiff,

20 v.

21 THE CITY OF SAN DIEGO; POLICE

22 CHIEF DAVID NISLEIT, in his

23 representative capacity as Chief of

24 Police; and LIEUTENANT ADAM

25 SHARKI, in his representative capacity

26 as SDPD Public Information Officer,

27 Defendants.

Case No.: '24CV0855 BAS DDL

**DECLARATION OF EVA KNOTT
IN SUPPORT OF PLAINTIFF'S
MOTION TO PROCEED USING
PSUEDONYM AND MOTION
FOR PRELIMINARY
INJUNCTION**

28 I, Eva Knott, Declare:

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1. I am the plaintiff in this action. I have personal knowledge of the facts stated herein, unless stated on information and belief, and if called upon to testify to those facts I could and would competently do so.

2. I have been a reporter for over fifteen years. I regularly write for the San Diego Reader, a local news publication which is both a weekly hardcopy paper, and a substantial online presence with their own website. I also report for The Post Millennial, an online news media presence. I specialize in covering crime and courts in San Diego County. Most recently, my work has concentrated on a large Antifa riot criminal case SCD274477 that has been working its way through state court since 2021. Sentencing dates for this 11-defendant case are set for next month, June 2024.

3. Eva Knott is the *nom de plume* I use in my work as a journalist.

4. When I have been at the courthouse gathering information for my news reporting, gang members have attempted to intimidate me. I have had gang members blatantly photograph and video record me. They have also seated themselves next to me in the courtroom. Female gang members have followed me into the women’s restroom. Once, two peewees (young male gangsters) quickly got into the elevator with me, one on each side, laughing loudly and saying to each other, “Snitches end up in ditches!” Once, an agitated young man got very close to me and demanded to know why I wrote a story about him stealing a car.

5. In 2008 or 2009, I received a handwritten letter sent to my home address from a convicted felon whose trial I had reported on. My husband and I found this to be deeply concerning. In fact, my husband was so horrified that he wanted me to stop reporting on court matters. I persuaded him that I could protect myself by using a pen name. I discussed the issue with my editor, and we agreed that for safety reasons I

1 would begin using a pen name. Since then, I have been known professionally as Eva
2 Knott. I am a widow, but in my personal life I continue to use my married name.

3 6. Before the incident described in the immediately preceding paragraph, I
4 had applied for and was issued a San Diego Police Department Media Identification
5 Card (press pass) in my married name. After I adopted the pen name Eva Knott, I
6 renewed my press pass using my pen name with the full knowledge of SDPD. Press
7 passes must be renewed every two years, and each time I renewed my press pass, I
8 applied using the name Eva Knott. As required by SDPD regulations, when my
9 applications to renew my press pass were approved, I went to the police station to
10 present a government issued ID and complete the credentialling process, although they
11 did not always check my ID. As part of the process, I was required to turn in my
12 expiring press pass. I was fingerprinted and a new photo was taken. A replacement pass
13 was then issued with the new photograph. The number of the new pass remained the
14 same as the number on the old pass. I followed this procedure every two years apart
15 from one time during COVID when I was instructed to just pick up a new press pass
16 with a new date.

17 7. In advance of state court proceedings, I routinely submit a completed
18 Mandatory Judicial Council Form MC-500 and the accompanying proposed order Form
19 MC-510 on behalf of either the San Diego Reader or the Post Millennial seeking a
20 Court order allowing me, as a representative of those media outlets, to film, photograph,
21 or record the proceedings. Consistent with my use of my pseudonym in connection with
22 my reporting, I routinely used my pseudonym on the submitted MC-500/MC-510
23 Forms.

24 8. In August of 2022, I was regularly covering the criminal proceedings
25 against 11 members of Antifa charged with various types of crimes. After one
26 proceeding someone approached me and started demanding to know if Eva Knott was
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1 my legal name. He got very close to me and held a phone/camera close to my face. I
2 was unsure who this person was, I had just left an Antifa court hearing and was fearful
3 that he was a violent Antifa person, and I chose not to give that stranger my married
4 name. He also demanded to know if I lived in San Diego, and I replied that I lived in
5 San Diego County (this information is on my public page on TwitterX as @EvaKnott.)
6 Now I suspect that person was Will Carless, who writes favorable coverage about
7 Antifa for the USA Today publication. This was confirmed by the emails to SDPD,
8 from Will Carless, (discovered by my attorney's public record request) when Will
9 Carless tried to make trouble for me by contacting SDPD and complaining of my use of
10 a pen name.

11 9. In October 2022, I received an email from the email address
12 Medialnquiry@pd.sandiego.gov stating that my press pass had been revoked. The email
13 heavily implied that the reason it was revoked was because I applied using my pen
14 name Eva Knott rather than my birth name or my married name. SDPD produced a
15 copy of this email in response to my lawyer's public records request and it is attached to
16 his declaration as an exhibit.

17 10. I was suspicious of the email. It did not make sense to me since SDPD had
18 been aware I was using a pen name since I began doing so. When I first applied for a
19 press pass from SDPD, I applied using my married name, and I assumed SDPD kept a
20 record of that information. When we switched from my married name to my pen name,
21 on my SDPD press pass, the police were completely aware of this switch and okayed it.
22 Also, the email contained no signature block. It seemed odd to me that someone from
23 SDPD would contact me via e-mail with such consequential news without identifying
24 the name, rank, and position of the sender.

25 11. Since working on the Antifa criminal cases, I was on high alert with regard
26 to my personal safety...even more so than usual. During the course of the criminal trial
27 proceedings several incidents caused me concern for my safety. For example, I got a
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1 call from a San Francisco phone number inquiring of my name, and I hung up on that
2 man. Another time, when I was walking my dog in the evening, I saw one of the
3 defendants sitting in a car outside of my condo building. Also, through my coverage of
4 the case, I was aware that the Leah Madbak, girlfriend of Antifa defendant Jesse
5 Cannon, worked in the Public Defender's Office and she used her position to look up
6 personal info about witnesses and victims, and she passed this along to her Antifa
7 compadres. I wrote an article about the situation which was published on line at:
8 [https://www.sandiegoreader.com/news/2022/apr/26/stringers-does-san-diego-antifa-](https://www.sandiegoreader.com/news/2022/apr/26/stringers-does-san-diego-antifa-man-have-doxing/)
9 [man-have-doxing/](https://www.sandiegoreader.com/news/2022/apr/26/stringers-does-san-diego-antifa-man-have-doxing/) I obtained from the Clerk's Office a copy of a declaration signed by
10 Deputy District Attorney Will Hopkins which discussed the violent nature of some of
11 the criminal defendants. The declaration also discussed the fact that members of Antifa
12 dox their targets. A copy of that Declaration is attached as **EXHIBIT N**. These facts
13 also put doubt in my mind about the unsigned email stating that SDPD had revoked my
14 press pass.

15 12. I sent a return email explaining that I had been using my pen name for
16 years. I hoped that if the email was authentic, SDPD might reconsider their position
17 once reminded of the facts. My email to SDPD did not get a reply, so that assured me I
18 was correct in reasoning that it was a hoax or spoof from Antifa persons, and I kept
19 busy with my reporting and tried not to be distracted by the hoaxers.

20 13. On February 22, 2023, the Post Millennial published a major article about
21 the Antifa trial co-written by me and my writing partner Andy Ngo. The article heavily
22 focused on Defendant Brian Cortez Lightfoot and included photographs I had taken of
23 him and his attorney in the Courtroom. The next day, Lightfoot filed a motion seeking
24 to revoke my courtroom press privileges. In the motion, Lightfoot claimed I had
25 knowingly filed a false or forged instrument because I had signed my media request
26 forms using my pen name. The motion included an allegation that my SDPD press pass
27 had been revoked. The filing was so over the top, and in my mind so clearly in response
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1 to my article, that I believed its sole purpose was to dox and intimidate me. Since the
2 motion claiming SDPD had revoked my press pass was filed by an Antifa member, I
3 still believed Antifa was the original source of the claim—perhaps more so than ever. I
4 wondered, “how would Lightfoot or his attorney know anything about my press pass
5 being revoked?” It is still not clear to me what happened.

6 14. I engaged an attorney to oppose the Lightfoot motion. The court rejected
7 Lightfoot’s motion, ruling from the bench that Lightfoot did not have standing to bring
8 such a motion and stating that my using a pseudonym caused no harm.

9 15. Still unsure of the status of my press pass, my attorney wrote a cover letter
10 that he delivered to SDPD Media Department along with my application to renew my
11 press pass, which was set to expire April 1, 2024. My attorney described the facts of my
12 applications to SDPD in his declaration, so I do not repeat them here.

13 16. SDPD claimed they denied my application because it did not demonstrate
14 that I regularly need to cross police or fire lines. This makes no sense to me. For one
15 thing, nothing with regard to my work has changed since I submitted the last several
16 press pass renewal applications which SDPD approved. In fact, if anything, I rely on my
17 press pass more now than ever. Covering the Antifa trial has been important to my
18 journalism career. Writing with Andy Ngo about the Antifa trials has led to being
19 published in the Post Millennial, which has a national and international reach far
20 beyond the local publication the San Diego Reader.

21 17. I am frequently at the Courthouse, where Sheriff’s deputies check press
22 passes to determine who can sit in the front row of the gallery in the courtroom—a type
23 of police line that I cross almost daily. Court clerks also expedite my access to court
24 files when I have my press pass. Although it is not my primary concern by any means,
25 having the parking pass that accompanies a press pass, assists me in my news gathering
26 efforts.

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18. The thing that makes news coverage so important (and interesting from my prospective) is that one never knows what is going to happen next. So, there may be many important stories relating to the areas I report on that I have no way of anticipating. However, there are several upcoming events that I plan to cover which will be negatively affected by my current lack of an SDPD press pass. I am particularly concerned about not having my press pass when the sentencing for the Antifa Defendants is announced on June 12th and 28th. It is likely that demonstrations will take place when the court announces those sentences. I intend to cover those demonstrations. Without an SDPD press pass, I will not have the same ability to cross police lines as SDPD press pass-carrying journalists. I am also specifically concerned about not having my press pass during the upcoming presidential elections, which are also very likely to result in demonstrations or civil unrest that I will want to cover.

I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.

Executed on May ¹³____, 2024, at San Diego, California.

DocuSigned by:
Eva Knott
92FF59AE74F3406...

Eva Knott (pseudonym)

EXHIBIT N

1 **DECLARATION IN SUPPORT OF REQUEST FOR PROTECTIVE ORDER**
2 **REGULATING RELEASE OF DISCOVERY**

3 I, WILL HOPKINS declare as follows:
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- 5 1. I am the Deputy District Attorney assigned the above-entitled case.
6 2. I know the Defendants, JOESPH GASKINS, ALEXANDER ACKRIDGE JACOBS,
7 BRIAN LIGHTFOOT, JEREMY WHITE, SAMUEL OGDEN, CHRISTIAN
8 MARTINEZ, LUIS MORA, BRIAN RIVERA, ERICH YACH, MARTIN TALAB, and
9 JESSE CANNON, self-identify as members of the anarchist group commonly referred to
10 as ANTIFA.
11 3. I further know that several of the Defendants and their affiliates have engaged in acts of
12 violence on multiple occasions in multiple jurisdictions.
13 4. As a Deputy District Attorney, through the investigation of this case I have come across
14 several gigabytes of data that the ANTIFA cells or “affinity groups”, to which the
15 Defendants belong, have collected on persons they have had any sort of disagreement
16 with. These persons include, police officers, political rivals, elected officials and even
17 their own members who have fallen out of favor.
18 5. The information we have discovered in their possession includes but is not limited to,
19 police reports containing the target’s home address, license plates, surveillance photos of
20 individuals with their families, civil and criminal documents relating to these targets, San
21 Diego Sheriff’s Deputy, federal agents, and San Diego Police Officers names, badge
22 numbers, duty assignments, salary information.
23 6. With this information I know that members of ANTIFA disseminate and share the
24 information to “dox” their targets.
25 7. I know “doxing” to mean posting private information on the internet specifically, names
26 addresses, IP addresses, email and social media accounts, place of work, identifying
27 family members and any other type of private information that can be leveraged against
28 the target.
29 8. I know that members of ANTIFA specifically use this information to harass, attack, and

1 stalk victims in order to socially, psychologically, and physically harm their targets.

2 9. I am aware that several of the defendants' and their affiliates have engaged in this type of
3 behavior within their respective Antifa cells or "affinity groups".

4 10. I know recently social media accounts associated with several of the Defendants posted
5 pictures of people they believed to be the victims in this case just last week on December
6 8, 2021, in an apparent attempt to intimidate or dissuade them from testifying.

7 (Attachment 1)

8 11. I know that during the service of search warrants in this case several of the defendants
9 were found to be in the possession of police reports that were not associated with their
10 own cases. (Attachment 2)

11 12. I know that several public officials had their home addresses posted by these groups and
12 that there was at least one instance of physical violence that resulted outside of one of the
13 public official's home which was perpetrated by ERICH YACH.

14 13. Several firearms have been recovered from the service of search warrants executed in this
15 case. Further, there is evidence that several of these defendants have access to other
16 weapons which were not recovered. (See Attachment 3)

17 14. I have been notified that at least one of the victims specific to this case has already been
18 targeted by these tactics in what appears to Law Enforcement to be an attempt at
19 dissuading him/her from cooperating in this case.

20 15. I am also aware that JESSE CANNON is or was romantically involved with LEAH
21 MADBAK who works as an Investigator for the San Diego Public Defender's Office. I
22 have seen evidence that both CANNON and MADBAK run and or have administrative
23 privileges for several Antifa based social media accounts, specifically SDagainstFash,
24 sdreportingcollective, S.N.A.I.L. Cru and R.A.B.I.D.. I know they have posted police
25 reports and intentionally disseminated potentially harmful information in an attempt to
26 "dox" their targets. (Attachment 4)

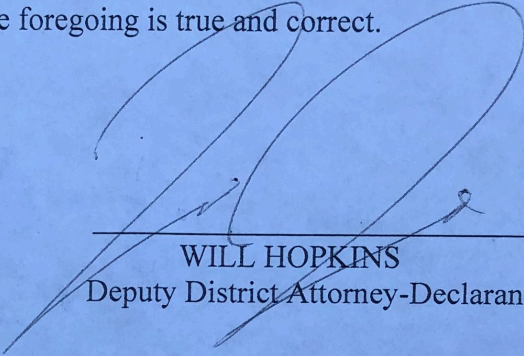
27 16. I believe that should the discovery in this case be provided to other members of this
28 organization, it will endanger future criminal prosecution and the safety of witnesses and
29 victims in the present case.

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17. Considering the very real dangers associated with witnesses providing information to law enforcement, the People believe there is a very real threat to the safety of the witnesses, investigating officers, and victims in this case should the Defendants be allowed to have carte blanche access to do whatever they wish with the discovery materials from this case.

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

Dated:



WILL HOPKINS
Deputy District Attorney-Declarant