

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

4 2. I am a journalist who writes for the Post Millennial and other news
5 publications.

6 3. While reporting on political public demonstrations, I was beaten and
7 severely injured by an Antifa mob in Portland, Oregon in June 2019 and again in May
8 2021. Antifa members have repeatedly showed up at my family’s home to look for me
9 and have issued threats to kill or injure me because of my reporting. These incidents are
10 documented in numerous reports to the Portland Police Bureau.

11 4. I have attached as **EXHIBIT O** photographs of threats against my life
12 made in public spaces in Portland, where I reside. The markings accompanying the
13 threats to “Kill Andy Ngo” are associated with Antifa. The three arrows in a circle is an
14 Antifa Logo and ACAB is an acronym for the slogan “All Cops Are Bastards,” which
15 Antifa has adopted.

16 5. On February 22, 2023, the Post Millennial published an article I co-wrote
17 with Eva Knott with the headline, “Antifa ringleader faces 16 felony charges in brutal
18 San Diego attack—mob used tear gas, beat teenagers in ‘MAGA’ clothing.” The article
19 detailed the allegations against Brian Lightfoot and identified John Hamasaki as
20 Lightfoot’s attorney. The article featured photographs of Lightfoot and Hamasaki that
21 Eva took in the courtroom.

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

24 Executed on 5/10/2024, at Las Vegas, Dean Martin Dr.

DocuSigned by:
Andy Ngo
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25
26
27 Andy Ngo

EXHIBIT O

