| | ese 3.2442-0-68855-BAS-BB23306806ument 1-4 | Filed 05/15/24 | PageID.95 Page 1 of 4 | |
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| 11 | Attorneys for Eva Knott | | | |
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| 13 | UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF CALIFORNIA | | | |
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| 14 | | ISTRICT OF (| CALIFORNIA | |
| 14 15 16 | EVA KNOTT (pseudonym), | | CV0855 BAS DDL | |
| 15 | | Case No.: <u>'24</u> | CV0855 BAS DDL | |
| 15 16 | EVA KNOTT (pseudonym), Plaintiff, v. THE CITY OF SAN DIEGO; THE | Case No.: <u>'24</u> DECLARAT IN SUPPOR' | <u>CV0855 BAS DDL</u> TION OF ANDY NGO T OF PLAINTIFF'S | |
| 15 16 17 18 19 | EVA KNOTT (pseudonym), Plaintiff, v. THE CITY OF SAN DIEGO; THE SAN DIEGO POLICE DEPARTMENT; CAPITAN DAVID | Case No.: <u>'24</u> DECLARAT IN SUPPOR' | <u>CV0855 BAS DDL</u> ION OF ANDY NGO I OF PLAINTIFF'S O PROCEED | |
| 15 16 17 18 19 20 | EVA KNOTT (pseudonym), Plaintiff, v. THE CITY OF SAN DIEGO; THE SAN DIEGO POLICE DEPARTMENT; CAPITAN DAVID NISLEIT, personally and in his | Case No.: <u>'24</u> DECLARAT IN SUPPOR' MOTION TO | <u>CV0855 BAS DDL</u> ION OF ANDY NGO I OF PLAINTIFF'S O PROCEED | |
| 15 16 17 18 19 20 21 | EVA KNOTT (pseudonym), Plaintiff, v. THE CITY OF SAN DIEGO; THE SAN DIEGO POLICE DEPARTMENT; CAPITAN DAVID NISLEIT, personally and in his capacity as Chief of Police; LIEUTENANT ADAM SHARKI, | Case No.: <u>'24</u> DECLARAT IN SUPPOR' MOTION TO | <u>CV0855 BAS DDL</u> ION OF ANDY NGO I OF PLAINTIFF'S O PROCEED | |
| 15 16 17 18 19 20 21 22 | EVA KNOTT (pseudonym), Plaintiff, v. THE CITY OF SAN DIEGO; THE SAN DIEGO POLICE DEPARTMENT; CAPITAN DAVID NISLEIT, personally and in his capacity as Chief of Police; | Case No.: <u>'24</u> DECLARAT IN SUPPOR' MOTION TO | <u>CV0855 BAS DDL</u> ION OF ANDY NGO I OF PLAINTIFF'S O PROCEED | |
| 15 16 17 18 19 20 21 | EVA KNOTT (pseudonym), Plaintiff, v. THE CITY OF SAN DIEGO; THE SAN DIEGO POLICE DEPARTMENT; CAPITAN DAVID NISLEIT, personally and in his capacity as Chief of Police; LIEUTENANT ADAM SHARKI, personally and in his official capacity | Case No.: <u>'24</u> DECLARAT IN SUPPOR' MOTION TO | <u>CV0855 BAS DDL</u> ION OF ANDY NGO I OF PLAINTIFF'S O PROCEED | |
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| 15 16 17 18 19 20 21 22 23 24 | EVA KNOTT (pseudonym), Plaintiff, v. THE CITY OF SAN DIEGO; THE SAN DIEGO POLICE DEPARTMENT; CAPITAN DAVID NISLEIT, personally and in his capacity as Chief of Police; LIEUTENANT ADAM SHARKI, personally and in his official capacity as SDPD Public Information Officer; and DOES 1 through 10; | Case No.: <u>'24</u> DECLARAT IN SUPPOR' MOTION TO | <u>CV0855 BAS DDL</u> ION OF ANDY NGO I OF PLAINTIFF'S O PROCEED | |
| 15 16 17 18 19 20 21 22 23 24 25 | EVA KNOTT (pseudonym), Plaintiff, v. THE CITY OF SAN DIEGO; THE SAN DIEGO POLICE DEPARTMENT; CAPITAN DAVID NISLEIT, personally and in his capacity as Chief of Police; LIEUTENANT ADAM SHARKI, personally and in his official capacity as SDPD Public Information Officer; and DOES 1 through 10; | Case No.: <u>'24</u> DECLARAT IN SUPPOR' MOTION TO | <u>CV0855 BAS DDL</u> ION OF ANDY NGO I OF PLAINTIFF'S O PROCEED | |
| 15 16 17 18 19 20 21 22 23 24 25 26 | EVA KNOTT (pseudonym), Plaintiff, v. THE CITY OF SAN DIEGO; THE SAN DIEGO POLICE DEPARTMENT; CAPITAN DAVID NISLEIT, personally and in his capacity as Chief of Police; LIEUTENANT ADAM SHARKI, personally and in his official capacity as SDPD Public Information Officer; and DOES 1 through 10; | Case No.: <u>'24</u> DECLARAT IN SUPPOR' MOTION TO | <u>CV0855 BAS DDL</u> ION OF ANDY NGO I OF PLAINTIFF'S O PROCEED | |

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.

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
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.

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

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

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

Executed on $\underline{\qquad}^{5/10/2024}$, at $\underline{\qquad}^{Las Vegas}$ Dean Martin-DdGcusigned t 25 An Ly Ngo 26 Andy Ngo 27

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EXHIBIT O



