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SAN FRANCISCO SCIENCE FICTION
7 CONVENTIONS, INC.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

JONATHAN DEL ARROZ,
Plaintiff,

v.

SAN FRANCISCO SCIENCE FICTION
CONVENTIONS, INC. (“SFSFC”) aka
“WORLDCON76” David W. Gallaher (2019),
President; David W. Clark (2020), Vice
President; Lise Detusch Harrigan (2020),
Treasurer; Kevin Standlee (2018), Secretary;
Sandra Childress (2019); Bruce Farr (2018),
Chair; 2018 SMOF Con Committee; Cheryl
Morgan (2020); Kevin Roche (2018), Chair;
2018 Worldcon (Worldcon 76) Committee;
Cindy Scott (2018); Randy Smith (2019),
Chair; New Zealand 2020 Worldcon Agent
Committee; Andy Trembley (2020); Jennifer
“Radar” Wylie (2019), Chair; CostumeCon
2021 Organizing Committee; Lori
Buschhaum; Susie Rodriguez and DOES 1
through 30, inclusive.,

Defendants.

Case No. 18-CV-334547

**DECLARATION OF LINDSEY PHO IN
SUPPORT OF DEFENDANT’S MOTION
FOR SUMMARY JUDGMENT**

Assigned to: Honorable Socrates P.
Manoukian, Dept 20

Date: May 11, 2021
Time: 9:00 a.m.
Dept.: 20
Judge: Honorable Socrates P. Manoukian

Action Filed: April 16, 2018
Trial Date: June 14, 2021

I, Lindsey Pho, declare and state as follows:

1. I am an attorney duly admitted to practice before this Court and am an associate of
Messner Reeves LLP, attorneys of record for Defendant San Francisco Science Fiction
Conventions, Inc. (hereinafter “Defendant” or “SFSFC”) in the above-entitled action. I have
personal knowledge of the matters herein, except as to those matters alleged upon information and

1 belief and as to those matters, I am informed and believe them to be true. If called as a witness, I
2 could and would competently testify to the matters stated herein.

3 2. Attached hereto as Exhibit A is a true and correct copy of the Plaintiff's Complaint
4 filed on April 16, 2018. The Complaint was originally filed in San Joaquin County Superior Court
5 before being transferred to Santa Clara County Superior Court.

6 3. On February 21, 2019, this Court sustained, without leave to amend, Defendant's
7 demurrer on the Plaintiff's first, second, third and fourth causes of action. The sole remaining
8 claim in this action is Plaintiff's fifth cause of action for defamation against SFSFC.

9 4. Attached hereto as Exhibit B is Defendant's form interrogatories, set one to
10 Plaintiff.

11 5. Attached hereto as Exhibit C is Plaintiff's verified responses to form
12 interrogatories, set one.

13 6. Attached hereto as Exhibit D is Plaintiff's verified responses to special
14 interrogatories, set one.

15 7. Attached hereto as Exhibit E is Defendant's request for admissions, set two.

16 8. Attached hereto as Exhibit F is Plaintiff's verified responses to request for
17 admissions, set two.

18 9. Attached hereto as Exhibit G is a true and correct copy of the relevant pages of the
19 deposition transcript of Plaintiff Jonathan Del Arroz, taken on January 13, 2021.

20 10. On or about February 18, 2021, I went to the website Wikipedia.org and searched
21 "Comicsgate." I reviewed the webpage, and printed out a true and correct screen capture of the
22 page. Defendant requests judicial notice for the Wikipedia entry for "Comicsgate," not for the
23 truth of its content, but for the fact that it exists. Attached to Defendant's Request for Judicial
24 Notice as Exhibit 13 is a true and correct copy of the "Comicsgate" entry.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing
26 is true and correct.

27 ///

28 ///

Executed on this 18th of February, 2021, at San Jose, California.



LINDSEY V. PHO

EXHIBIT "A"

HR6 10/15/2018

FILED
SUPERIOR COURT-SAN JOAQUIN

2018 APR 15 AM 11:55

ROSA L. VICKI C. CLARK
BY Erudina J. Hilden
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8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF SAN JOAQUIN, STATE OF CALIFORNIA

#435⁰²283910

10 JONATHAN DEL ARROZ,

11 Plaintiff,

12 v.

13 SAN FRANCISCO SCIENCE FICTION
14 CONVENTIONS, INC. ("SFSFC") aka
15 "WORLDCON76" David W. Gallaher
16 (2019), President; David W. Clark (2020),
17 Vice President; Lisa Detusch Harrigan
18 (2020), Treasurer; Kevin Standlee (2018),
19 Secretary; Sandra Childress (2019); Bruce
20 Farr (2018), Chair; 2018 SMOF Con
21 Committee; Cheryl Morgan (2020); Kevin
22 Roche (2018), Chair; 2018 Worldcon
23 (Worldcon 76) Committee; Cindy Scott
24 (2018); Randy Smith (2019), Chair; New
25 Zealand 2020 Worldcon Agent Committee;
26 Andy Trembley (2020); Jennifer "Radar"
27 Wylie (2019), Chair; CostumeCon 2021
28 Organizing Committee; Lori Buschhaum;
Susie Rodriguez and DOES 1 through 30,
inclusive,

Defendants.

CASE NO.

STK-CV-UMC-2018-

4397

COMPLAINT

EXCEEDS \$25,000 LIMIT

THIS CASE HAS BEEN ASSIGNED TO
JUDGE CARTER P. HOLLY IN
DEPARTMENT 10B FOR ALL PURPOSES,
INCLUDING TRIAL

COMPLAINT

I

BACKGROUND ALLEGATIONS

1. Plaintiff Jonathan Del Arroz is a professional science fiction writer whose principle place or residence is in California. Mr. Del Arroz has written or edited several bestselling works of science fiction including For Steam and Country: Book One of the Adventures of Baron Von Monocle and MAGA 2020 & Beyond.

2. Defendant San Francisco Science Fiction Conventions, Inc. ("SFSFC"), also known as "WorldCon76", is a California business entity with its principle business location in San Jose, California. SFSFC was organized as a corporation under the laws of the State of California. At the times relevant to this complaint, a part of SFSFC's corporate purpose was to organize the annual world science fiction convention in San Jose, California in 2018. Plaintiff is informed and believes and thereon alleges that following Individual Defendants are directors of SFSFC or are corporate officers and agents of WorldCon who participated in and/or authorized the tortious and illegal acts alleged herein: David W. Gallaher (2019), President; David W. Clark (2020), Vice President; Lisa Detusch Harrigan (2020); Treasurer; Kevin Standlee (2018), Secretary; Sandra Childress (2019); Bruce Farr (2018); Chair, 2018 SMOFC on Committee; Cheryl Morgan (2020); Kevin Roche (2018), Chair; 2018 Worldcon (Worldcon 76) Committee; Cindy Scott (2018); Randy Smith (2019), Chair; New Zealand 2020 Worldcon Agent Committee; Andy Trembley (2020); Jennifer "Radar" Wylie (2019), Chair; CostumeCon 2021 Organizing Committee (collectively "Individual Defendants"). Plaintiff is informed and believes that Defendant Susie Rodriguez is a senior staff or director of SFSFC and did participate in and authorized the acts alleged herein. Plaintiff is further informed and believes that Susie Rodriguez is a resident of San Joaquin County. Individual Defendant Lori Buschhaum is a senior staff or director of SFSFC and did participate, aid or incite the conduct alleged herein. Plaintiff is informed and believes and thereon alleges that one or more of the above-named Individual Defendants are residents of the County of San Joaquin, California.

1 3. Plaintiff does not presently know the name of the defendants sued herein as
2 Does 1 through 30, inclusive. Plaintiff will amend this complaint to state said defendants'
3 true names and capacities when ascertained. Plaintiff is informed and believes and thereon
4 alleges that said fictitiously-named defendants were partners, officers, agents, joint
5 venturers or were otherwise related to the wrongful conduct alleged herein in a way that
6 makes them legally liable for the damages alleged herein. Plaintiff will amend this
7 complaint to state said fictitiously named defendants true names and capacities when the
8 same are ascertained. Until such amendment, a reference to any defendant includes by
9 incorporation a reference to these fictitiously named defendants.

10 4. As a professional science fiction writer, Mr. Del Arroz received income from
11 name recognition obtained through self-promotion. This self-promotion takes place in
12 various ways, including maintaining a website on the internet, using social media such as
13 Facebook and Twitter, communications with fellow professional writers and the science
14 fiction fan community, and attending science fiction communities. Mr. Del Arroz has
15 regularly attended science fiction conventions in the Bay Area of California and has been
16 an invited speaker at such conventions. Attending science fiction conventions is a critical
17 part of Mr. Del Arroz's marketing strategy. It is also important to many professional
18 science fiction writers because it permits professional writers to meet fans, sell their books
19 to fans, and increase their name recognition among fans. Like many professional science
20 fiction writers, Mr. Del Arroz makes it his practice to take his books to sell at the science
21 fiction conventions he attended.

22 5. It has been the tradition in science fiction business since approximately 1939
23 for there to be an annual "world science fiction" convention. The location of the "world
24 convention", known as the "WorldCon" in the science fiction community, changes from
25 year to year. The tradition has been to have fans in the city where the WorldCon is to be
26 held to form a business entity to organize the WorldCon, sell tickets to fans, and enter into
27 the contracts necessary for the WorldCon to provide the goods and services that fans
28 expect.

1 6. The WorldCon is the most prestigious science fiction convention of the
2 various science fiction conventions that are held in a given year for various reasons. One
3 reason for its prestige is the history of the WorldCon as the oldest such convention.
4 Another reason is that the awards for the year's "best" science fiction and fantasy writing,
5 known as the "Hugo Awards," are given at the WorldCon. The awards are selected by vote
6 of the fans who buy tickets to the WorldCon.

7 7. It is traditional for the WorldCon to organize activities for persons buying
8 tickets to attend the WorldCon. These activities include discussions, marketing
9 opportunities and retail sales. Professional writers are encouraged by the WorldCon to
10 bring books to sell; WorldCon regularly sets aside areas for writers to sell their books to
11 fans. WorldCons also have large areas in the convention centers that are rented by the
12 business entities that organize the WorldCon for dealers to sell science fiction/fantasy-
13 related merchandise to fans. WorldCons make money by renting floor space to these
14 dealers, which helps to pay for the cost of the WorldCon. WorldCon also makes money by
15 selling admission tickets. These tickets also give fans the opportunity to cast their vote in
16 various categories for the "best" writing of the year.

17 8. SFSFC was selected to organize the 76th World Science Fiction Convention
18 ("WorldCon76") which was to be held in San Jose, California in August of 2018. SFSFC
19 has established a website -<http://www.worldcon76.org/>- where it has stated its intention to
20 have a "Creators' Alley will feature writers, artists, crafters and anyone creative who wants
21 to share their talents and products for a limited time" and a "Dealer's Room" where "a
22 world of nifty for purchase wares awaits your discovery" as well as other activities open to
23 the public.

24 9. SFSFC will hold WorldCon 76 at the San Jose McEnery Convention Center.
25 This convention center covers 550,000 square feet, including 165,000 square feet of exhibit
26 space, 31 meeting rooms, and banquet facilities for some 5,000. Mr. Del Arroz is informed
27 and believes and thereon alleges that the McEnery Convention Center is owned by the City

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1 of San Jose, a governmental entity, and that the City of San Jose prohibits discrimination in
2 violation of, *inter alia*, the Unruh Act by users of the convention center.

3 10. WorldCon76 is and will be open to the public. Currently, sales of tickets are
4 being made to the public. The tickets were characterized as "memberships" by SFSFC to
5 the public. SFSFC sold various kinds of tickets/memberships. For \$230, SFSFC sold an
6 "attending membership" which it advertised as follows: "Attending Adult membership
7 entitles the member to admission and attendance at Worldcon 76, the 2018 World Science
8 Fiction Convention, including the Masquerade, 2018 Hugo Awards Ceremony, and all
9 panels and member events and exhibits. It does not include housing, meals or
10 transportation." SFSFC also sold a "supporting membership" for \$50 which it advertised as
11 licensing the following: "A supporting membership includes electronic copies of all
12 publications (you may opt in for paper copies), nomination and voting rights for the 2018
13 Hugo Awards, and voting rights in site selection for the 2020 World Science Fiction
14 Convention and 2019 North American Science Fiction Convention. It may be upgraded to
15 a full attending membership by paying the difference in fees at the time of upgrade."

16 11. In 2017, Mr. Del Arroz purchased an attending membership. At the time of
17 the purchase, he paid \$50 as a down payment, which was permitted by the SFSFC, with the
18 intention of paying the balance prior to the convention.

19 12. On Tuesday, January 2, 2018 at 5:01 p.m., Mr. Del Arroz received an email
20 from Lori Buschbaum, who identified herself as the "Incident Response Team area head"
21 for Worldcon 76 which stated: "Jonathan, At this time we are converting your membership
22 to Worldcon76 to a supporting membership as you will not be permitted to attend the
23 convention. On your personal blog you have made it clear that you are both expecting and
24 planning on engendering a hostile environment which we do not allow. If you are found on
25 the premises of the convention center or any of the official convention hotels you will be
26 removed. Your payment of \$50 covers the cost of your supporting membership in its
27 entirety, and you have no balance owing. As a supporting member your nomination and
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1 voting rights for the Hugo Awards and site selection are maintained. If you prefer a full
2 refund that can be arranged."

3 13. The statement that Mr. Del Arroz had "made it clear that you are both
4 expecting and planning on engendering a hostile environment which we do not allow" was
5 false. Mr. Del Arroz had stated that he expected to be harassed at the convention site based
6 on his announced political views, namely that he is a Republican, a Trump supporter, and a
7 believer in limited government, and that he intended to wear a body cam in order to
8 document such harassment and protect himself from baseless charges that he had been the
9 aggressor in such encounters. Mr. Del Arroz was aware that other people wore body
10 cameras at science fiction conventions and that they posted excerpts from such recordings
11 on their websites, blogs and vlogs.

12 14. Mr. Del Arroz's concerns arose in part from reports that he had read about
13 leftwing professional writers attempting to provoke outspoken conservative writers. For
14 example, on or about September 21, 2017, Mr. Del Arroz read journalist Megan Fox of PJ
15 Media report, in her article titled, "Secret Facebook Page Reveals Marvel, DC Comics
16 Writers Conspiring to Harass Comic-Con Conservatives," regarding professional comic
17 book writers and artists who plotted against conservative YouTube reviewer, Richard C.
18 Meyer, stating "I'd love to follow him around trying to goad him into throwing a punch" in
19 an effort to have Mr. Meyer banned from the convention under false pretenses. This
20 incident targeting Conservatives at a recent large convention is what prompted Mr. Del
21 Arroz to inquire to Mr. Roche regarding safety concerns for Conservatives at WorldCon.

22 15. In addition, Mr. Del Arroz had attended the convention center where World
23 Con 76 was going to be held as part of a Trump presidential election rally and had been
24 among the thousands of Trump supporters attacked by leftwing radicals.

25 16. At no time had Mr. Del Arroz been told that wearing a body camera was not
26 permitted or would be considered an act that would "engender a hostile environment." Mr.
27 Del Arroz is informed and believes and thereon alleges that in truth there is no policy
28 against the wearing or use of body cameras at WorldCon76 and that this purported policy

1 was selectively engineered to apply only to him in order to deny him his legal and civil
2 rights and to retaliate against him because of his political views.

3 17. In fact, the Code of Conduct of WorldCon76 states as follows: "Photographs
4 and videotape footage by attendees are generally allowed in all common areas of the
5 convention with the exception of the Art Show." At all times, Mr. Del Arroz was prepared
6 to comply with the code of conduct and would have affirmed as much to SFSFC if he had
7 been asked."

8 18. On November 2, 2017, Mr. Del Arroz had communicated to the chairman of
9 WorldCon76 the following statement about his concerns regarding his safety: "Hi Kevin.
10 Just following up here. After talking to a lot of the guys there's a lot of serious concern for
11 safety just with the way this year has gone. Most have bowed out of the idea of attending
12 and I'm on the fence myself (I've had some folk from SFWA doxx my children on the
13 internet and send unsolicited packages to my house upon finding my address). I wish it
14 were a bit different but it looks like conventions might not be a spot where conservative
15 authors can attend safely anymore."

16 19. Mr. Del Arroz received no response from the chairman of WorldCon76 or
17 from any agent or representative of WorldCon76 to discuss his concerns. It was in the
18 context of this communication and SFSFC's failure and refusal to communicate about Mr.
19 Del Arroz's safety concerns that he made his comment about wearing a body camera.

20 20. At no time prior to this email – or thereafter – was Mr. Del Arroz asked
21 about his intentions or told that his plan to wear a body camera constituted a violation of
22 any rules or policies of Worldcon 76.

23 21. Thereafter, SFSFC's official and authorized social media posted on Facebook
24 the following statement about the alleged reason that Mr. Del Arroz had been barred from
25 WorldCon76: "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from
26 attending to supporting. He will not be allowed to attend the convention in person. Mr. Del
27 Arroz's supporting membership preserves his rights to participate in the Hugo Awards
28 nomination and voting process. He was informed of our decision via email. We have taken

1 this step because he has made it clear that he fully intends to break our code of conduct.
2 We take that seriously. Worldcon 76 strives to be an inclusive place in fandom, as difficult
3 as that can be, and racist and bullying behavior is not acceptable at our Worldcon. This
4 expulsion is one step toward eliminating such behavior and was not taken lightly. The
5 senior staff and board are in agreement about the decision and it is final.”

6 22. This statement was false. As noted previously, Mr. Del Arroz never stated
7 any intent to violate any code of conduct. Worldcon 76 never explained to him that
8 anything he planned on doing would constitute a violation of any code of conduct. Mr. Del
9 Arroz is unaware of any such code of conduct. Mr. Del Arroz is informed and believes and
10 thereon alleges that there is no such code of conduct and that his conduct would not have
11 violated such a code of conduct. Further, Mr. Del Arroz is not a racist. Mr. Del Arroz has
12 often made a point of condemning racism and proudly identifying his Hispanic heritage.
13 Likewise, Mr. Del Arroz is not a bully. The statement that Mr. Del Arroz is a racist bully is
14 false and SFSFC and its representatives knew or should have known that the statement was
15 false. The statement was published by SFSFC and its representatives with knowledge of its
16 falsity in order to maliciously injure Mr. Del Arroz’s reputation and to retaliate against him
17 based on his political affiliations.

18 23. Mr. Del Arroz is informed and believes and thereon alleges that his banning
19 from WorldCon76 by SFSFC is due to his publicly outspoken status as a Republican, a
20 Trump supporter and a believer in small government. During the 2016 election season, Mr.
21 Del Arroz identified himself as a Trump supporter on his blog, on Twitter and on
22 Facebook. After this identification, Mr. Del Arroz found himself being condemned as
23 racist by opponents of President Trump, including many of such persons who are involved
24 in WorldCon76, either in its organization or on its social media sites. Prior to the 2016
25 election season, the science fiction community became embroiled in a split between
26 Progressives and Leftists and Conservative/Libertarians with Progressives and Leftists
27 generally controlling the apparatus of the WorldCon and Hugo Awards and
28 Conservative/Libertarians experiencing hostility at WorldCons. During and after 2016,

1 Mr. Del Arroz became identified with the Conservative/Libertarian faction within the
2 science fiction community. A traditional trope in that hostility has involved those identified
3 with the Conservatives/Liberterians position being baselessly slandered as "racists" and a
4 threat to "inclusiveness." Mr. Del Arroz is informed and believes and alleges thereon that
5 he was called a racist by SFSFC and discriminated against because of his political
6 affiliation and not because of his views on racial issues.

7 24. Mr. Del Arroz is informed and believes and thereon alleges that he is the first
8 person to have been banned completely from a WorldCon and that prior to his ban, the
9 only partial ban from a WorldCon was in the 1960s when Walter Breen, the notorious
10 pedophile husband of science fiction author Marion Zimmer Bradley, was banned for a
11 single day from a WorldCon.

12 25. The committee of Worldcon 76 has continued its pattern of engaging in
13 discriminatory actions in violation of Mr. Del Arroz's civil rights and conspiring to injure
14 his reputation as a professional science fiction writer. On or about February 9, 2017, Susie
15 Rodriguez, a committee member of Worldcon, stated on another committee member's
16 Facebook page: "I don't nix people for ideology. Conduct or speech based on ideology is a
17 whole other kettle of fish." Her statement responded to a post referring to Mr. Del Arroz by
18 name.

19 26. In February of 2018, SFSFC published a "Progress Report" to the public
20 stating in relevant part: "Finally, you may have heard that we chose to bar someone from
21 attending the convention based on their publicly posted plans to float our Code of Conduct
22 and anti-harassment policies. This is true. We stand up for our principles - and for the
23 right of all members to enjoy the convention - and our Code of Conduct reflects the core
24 values of WorldCon76." This statemennt was false in that Mr. Del Arroz had no such
25 plans. The statement was signed on behalf of Kevin Roche, Conference Chair.

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II

FIRST CAUSE OF ACTION

(Violation of Civil Code Section 51 (Unruh Act))

Against Named Defendants and Does 1 through 30)

27. Plaintiff incorporates the allegations contained in paragraphs 1 through 26 of this Complaint as if fully set forth herein, and incorporate those allegations verbatim herein by this reference.

28. Civil Code section 51(b) of the "Unruh Act" states: "All persons within the jurisdiction of this state are free and equal, and no matter what their sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, or immigration status are entitled to the full and equal accommodations, advantages, facilities, privileges, or services in all business establishments of every kind whatsoever." The California Legislature has stated that "[t]he enumerated characteristics are illustrative rather than restrictive." (Cal. Civ. Code. §51, Historical Notes -- Historical and Statutory Notes.) Under the Unruh Act, a business establishment may not discriminate against any person based on a personal characteristic representing a trait, condition, decision, or choice fundamental to a person's identity, beliefs and self-definition as that factor has been applied in previous cases. (*Semler v. General Electric Capital Corp.* (2011) 196 Cal.App.4th 1380, 1395; *Koebke v. Bernardo Heights Country Club* (2005) 36 Cal.4th 824, 842; *Curran v. Mount Diablo Council of the Boy Scouts* (1998) 17 Cal. 4th 670, 705.) The protection of the Unruh Act extends to political affiliation. (*Marina Point, Ltd. v. Wolfson* (1982) 30 Cal.3d 721, 726 ["Whether the exclusionary policy rests on the alleged undesirable propensities of those of a particular race, nationality, occupation, political affiliation, or age, ... the Unruh Act protects individuals from ... arbitrary discrimination."].)

29. WorldCon76 is a business establishment in that it holds itself out as open to the public without restriction and is using public facilities and engaging in public commerce.

1 30. Mr. Del Arroz was discriminated against in violation of the Unruh Act in that
2 he has been banned from attending WorldCon76 based upon his political affiliation and
3 political beliefs. Plaintiff is informed and believes and thereon alleges that this
4 discriminational conduct was engaged in by SFSFC. The remaining named Defendants
5 aided or incited the alleged discrimination.

6 31. Plaintiff is informed and believes and thereon alleges that the Individual
7 Defendants and Does 1 through 30 aided, incited, authorized, ratified or conspired in the
8 denial of Mr. Arroz's right to free and equal entry into WorldCon76.

9 32. Civil Code section 52 provides: "[w]hoever denies, aids or incites a denial, or
10 makes any discrimination or distinction contrary to Section 51, 51.5, or 51.6, is liable for
11 each and every offense for the actual damages, and any amount that may be determined by
12 a jury, or a court sitting without a jury, up to a maximum of three times the amount of
13 actual damage but in no case less than four thousand dollars (\$4,000), and any attorney's
14 fees that may be determined by the court in addition thereto, suffered by any person denied
15 the rights provided in section 51, 51.5, or 51.6."

16 33. As a proximate result of Defendants, and each of their, conduct, Mr. Del
17 Arroz has been financially damaged with respect to lost sales he would have made at
18 WorldCon76 and as to lost book sales arising from the injury to his reputation as an author
19 as a result of the banning in an amount to be proven at trial. In addition, as a proximate
20 result of Defendants', and each of their, conduct, Mr. Del Arroz has suffered emotional
21 distress, including embarrassment, humiliation, anguish, stress and depression as a result of
22 defendants' unlawful and unfair treatment.

23 34. Defendants and each of their conduct was fraudulent, oppressive, and
24 malicious in that said Defendants were aware that they were threatening Mr. Del Arroz
25 with physical violence in order to prevent him from exercising his important civil rights
26 including the right of association and the right to use public property and the right to free
27 and equal treatment by business establishments. Mr. Del Arroz is therefore entitled to an
28 award of punitive damages according to proof.

35. Plaintiff is entitled to a treble the actual damages he proves at court but is entitled to no less than \$4,000 pursuant to Civil Code section 52.

36. Plaintiff is entitled to attorney's fees pursuant to Civil Code section 52.

III

SECOND CAUSE OF ACTION

(Violation of Civil Code Section 51.5)

Against Named Defendants and Does 1 through 30)

37. Plaintiff incorporates the allegations contained in paragraphs 1 through 36 of this Complaint as if fully set forth herein, and incorporate those allegations verbatim herein by this reference.

38. Civil Code section 51.5(a) provides: "No business establishment of any kind whatsoever shall discriminate against, boycott or blacklist, or refuse to buy from, contract with, sell to, or trade with any person in this state on account of any characteristic listed or defined in subdivision (b) or (e) of section 51, or of the person's partners, members, stockholders, directors, officers, managers, superintendents, agents, employees, business associates, suppliers, or customers, because the person is perceived to have one or more of those characteristics, or because the person is associated with a person who has, or is perceived to have, any of those characteristics." The characteristics listed or defined by Civil Code section 51.5 include "political affiliation." (*Marina Point, Ltd. v. Wolfson* (1982) 30 Cal.3d 721, 726 ["Whether the exclusionary policy rests on the alleged undesirable propensities of those of a particular race, nationality, occupation, political affiliation, or age, ... the Unruh Act protects individuals from ... arbitrary discrimination."].)

39. WorldCon76 is a business establishment in that it holds itself out as open to the public without restriction and is using public facilities and engaging in public commerce.

40. SFSFC discriminated against, boycotted or blacklisted, or refused to contract with or sell to Mr. Del Arroz by refusing to sell him an attending membership because of

1 his political affiliation and political beliefs. Plaintiff is informed and believes that the other
2 named Defendants aided or incited this unlawful conduct.

3 41. Plaintiff is informed and believes and thereon alleges that the Individual
4 Defendants and Does 1 through 30 aided, incited, authorized, ratified or conspired in the
5 said discrimination, blacklisting, boycotting, and refusal to sell or contract with Mr. Arroz
6 with respect to his purchase of an attending membership.

7 42. Civil Code section 52 provides: "[w]hoever denies, aids or incites a denial, or
8 makes any discrimination or distinction contrary to section 51, 51.5, or 51.6, is liable for
9 each and every offense for the actual damages, and any amount that may be determined by
10 a jury, or a court sitting without a jury, up to a maximum of three times the amount of
11 actual damage but in no case less than four thousand dollars (\$4,000), and any attorney's
12 fees that may be determined by the court in addition thereto, suffered by any person denied
13 the rights provided in section 51, 51.5, or 51.6."

14 43. As a proximate result of Defendants, and each of their, conduct, Mr. Del
15 Arroz has been financially damaged with respect to lost sales he would have made at
16 WorldCon76 and as to lost book sales arising from the injury to his reputation as an author
17 as a result of the banning in an amount to be proven at trial. In addition, as a proximate
18 result of Defendants', and each of their, conduct, Mr. Del Arroz has suffered emotional
19 distress, including embarrassment, humiliation, anguish, stress and depression as a result of
20 defendants' unlawful and unfair treatment.

21 44. Defendants and each of their conduct was fraudulent, oppressive, and
22 malicious in that said Defendants were aware that they were threatening Mr. Del Arroz
23 with physical violence in order to prevent him from exercising his important civil rights
24 including the right of association and the right to use public property and the right to free
25 and equal treatment by business establishments. Mr. Del Arroz is therefore entitled to an
26 award of punitive damages according to proof.

27 45. Plaintiff is entitled to a treble the actual damages he proves at court but is
28 entitled to no less than \$4,000 pursuant to Civil Code section 52.

46. Plaintiff is entitled to attorney's fees pursuant to Civil Code section 52.

IV

THIRD CAUSE OF ACTION

Violation of Civil Code Section 51.7

Against Named Defendants and Does 1 through 30)

47. Plaintiff incorporates the allegations contained in paragraphs 1 through 46 of this Complaint as if fully set forth herein, and incorporate those allegations verbatim herein by this reference.

48. Civil Code section 51.7(a) provides: "All persons within the jurisdiction of this state have the right to be free from any violence, or intimidation by threat of violence, committed against their persons or property because of political affiliation, or on account of any characteristic listed or defined in subdivision (b) or (e) of section 51, or position in a labor dispute, or because another person perceives them to have one or more of those characteristics. The identification in this subdivision of particular bases of discrimination is illustrative rather than restrictive." The characteristics listed or defined by Civil Code section 51.5(b) include "political affiliation." (*Marina Point, Ltd. v. Wolfson* (1982) 30 Cal.3d 721, 726 ["Whether the exclusionary policy rests on the alleged undesirable propensities of those of a particular race, nationality, occupation, political affiliation, or age, ... the Unruh Act protects individuals from ... arbitrary discrimination."].)

49. On Tuesday, January 2, 2018 at 5:01 p.m., Mr. Del Arroz received an email from Lori Buschbaum, who identified herself as the "Incident Response Team area head" for Worldcon 76 which stated in relevant part: "If you are found on the premises of the convention center or any of the official convention hotels you will be removed." This statement constituted intimidation by threat of violence against Mr. Del Arroz because of his political affiliation in that Defendants and each of them threatened to have Mr. Del Arroz forced physically removed against his consent and acquiescence from locations he had a right to be in such as the lobby of a hotel. This threat was understood by Mr. Del Arroz to include violence in that Mr. Del Arroz had advised SFSFC of his concern about

1 physical violence at WorldCon76 and Mr. Arroz had been threatened with violence by
2 members of SFSFC and individuals who had said that they would be attending
3 WorldCon76 on social media maintained by SFSFC. At no time had SFSFC advised Mr.
4 Del Arroz that he would be safe at WorldCon76 and at no time did SFSFC make any effort
5 to stop anyone from expressing a violent animus against Mr. Del Arroz on its social media
6 sites.

7 50. Mr. Del Arroz was threatened by SFSFC and Lori Buschbaum. Plaintiff is
8 informed and believes that the remaining named Defendants aided or incited this conduct.
9 Plaintiff is informed and believes and thereon alleges that the Individual Defendants and
10 Does 1 through 30 aided, incited, authorized, ratified or conspired in the said
11 discrimination, blacklisting, boycotting, and refusal to sell or contract with Mr. Arroz with
12 respect to his purchase of an attending membership.

13 51. Civil Code section 52(b) provides: "Whoever denies the right provided by
14 section 51.7 or 51.9, or aids, incites, or conspires in that denial, is liable for each and every
15 offense for the actual damages suffered by any person denied that right and, in addition, the
16 following: (1) An amount to be determined by a jury, or a court sitting without a jury, for
17 exemplary damages. (2) A civil penalty of twenty-five thousand dollars (\$25,000) to be
18 awarded to the person denied the right provided by section 51.7 in any action brought by
19 the person denied the right, or by the attorney general, a district attorney, or a city attorney.
20 An action for that penalty brought pursuant to section 51.7 shall be commenced within
21 three years of the alleged practice. (3) Attorney's fees as may be determined by the
22 court."

23 52. As a proximate result of defendants, and each of their, conduct, Mr. Del
24 Arroz has been financially damaged with respect to lost sales he would have made at
25 WorldCon76 and as to lost book sales arising from the injury to his reputation as an author
26 as a result of the banning in an amount to be proven at trial. In addition, as a proximate
27 result of Defendants, and each of their, conduct, Mr. Del Arroz has suffered emotional
28

1 distress, including embarrassment, humiliation, anguish, stress and depression as a result of
2 Defendants' unlawful and unfair treatment.

3 53. Defendants and each of their conduct was fraudulent, oppressive, and
4 malicious in that said Defendants were aware that they were threatening Mr. Del Arroz
5 with physical violence in order to prevent him from exercising his important civil rights
6 including the right of association and the right to use public property and the right to free
7 and equal treatment by business establishments. Mr. Del Arroz is therefore entitled to an
8 award of punitive damages according to proof.

9 54. Plaintiff is entitled to a civil penalty of \$25,000.

10 55. Plaintiff is entitled to attorney's fees pursuant to Civil Code section 52.

11 V

12 **FOURTH CAUSE OF ACTION**

13 **(Violation of Civil Code Section 52.1**

14 **Against Named Defendants and Does 1 through 30)**

15 56. Plaintiff incorporates the allegations contained in paragraphs 1 through 55 of
16 this Complaint as if fully set forth herein, and incorporate those allegations verbatim herein
17 by this reference.

18 57. Civil Code section 52.1(a) provides: "(a) If a person or persons, whether or
19 not acting under color of law, interferes by threat, intimidation, or coercion, or attempts to
20 interfere by threat, intimidation, or coercion, with the exercise or enjoyment by any
21 individual or individuals of rights secured by the Constitution or laws of the United States,
22 or of the rights secured by the Constitution or laws of this state, the attorney general, or any
23 district attorney or city attorney may bring a civil action for injunctive and other
24 appropriate equitable relief in the name of the people of the State of California, in order to
25 protect the peaceable exercise or enjoyment of the right or rights secured. An action
26 brought by the attorney general, any district attorney, or any city attorney may also seek a
27 civil penalty of twenty-five thousand dollars (\$25,000). If this civil penalty is requested, it
28 shall be assessed individually against each person who is determined to have violated this

1 section and the penalty shall be awarded to each individual whose rights under this section
2 are determined to have been violated.”

3 58. On Tuesday, January 2, 2018 at 5:01 p.m., Mr. Del Arroz received an email
4 from Lori Buschbaum, who identified herself as the “Incident Response Team Area Head”
5 for Worldcon 76 which stated in relevant part: “If you are found on the premises of the
6 convention center or any of the official convention hotels you will be removed.” This
7 statement constituted a threat, intimidation or coercion designed to interfere with the
8 exercise and enjoyment by Mr. Del Arroz of his legal and constitutional rights, including
9 the right of association and the right to use public property and the right to free and equal
10 treatment by business establishments. This statement was understood by Mr. Del Arroz to
11 include a threat of violence in that Mr. Del Arroz had advised SFSFC of his concern about
12 physical violence at WorldCon76 and Mr. Arroz had been threatened with violence by
13 members of SFSFC and individuals who had said that they would be attending
14 WorldCon76 on social media maintained by SFSFC. At no time had SFSFC advised Mr.
15 Del Arroz that he would be safe at WorldCon76 and at no time did SFSFC make any effort
16 to stop anyone from expressing a violent animus against Mr. Del Arroz on its social media
17 sites.

18 59. Mr. Del Arroz was threatened by SFSFC and Lori Buschbaum. Plaintiff is
19 informed and believes that the remaining named Defendants aided or incited this conduct.
20 Plaintiff is informed and believes and thereon alleges that the Individual Defendants and
21 Does 1 through 30 aided, incited, authorized, ratified or conspired in the said
22 discrimination, blacklisting, boycotting, and refusal to sell or contract with Mr. Arroz with
23 respect to his purchase of an attending membership.

24 60. Civil Code section 52.1(b) provides: “Any individual whose exercise or
25 enjoyment of rights secured by the Constitution or laws of the United States, or of rights
26 secured by the Constitution or laws of this state, has been interfered with, or attempted to
27 be interfered with, as described in subdivision (a), may institute and prosecute in his or her
28 own name and on his or her own behalf a civil action for damages, including, but not

1 limited to, damages under section 52, injunctive relief, and other appropriate equitable
2 relief to protect the peaceable exercise or enjoyment of the right or rights secured,
3 including appropriate equitable and declaratory relief to eliminate a pattern or practice of
4 conduct as described in subdivision (a).”

5 61. As a proximate result of Defendants', and each of their, conduct, Mr. Del
6 Arroz has been financially damaged with respect to lost sales he would have made at
7 WorldCon76 and as to lost book sales arising from the injury to his reputation as an author
8 as a result of the banning in an amount to be proven at trial. In addition, as a proximate
9 result of Defendants', and each of their, conduct, Mr. Del Arroz has suffered emotional
10 distress, including embarrassment, humiliation, anguish, stress and depression as a result of
11 Defendants' unlawful and unfair treatment.

12 62. Defendants' and each of their conduct was fraudulent, oppressive, and
13 malicious in that said Defendants were aware that they were threatening Mr. Del Arroz
14 with physical violence in order to prevent him from exercising his important civil rights
15 including the right of association and the right to use public property and the right to free
16 and equal treatment by business establishments. Mr. Del Arroz is therefore entitled to an
17 award of punitive damages according to proof.

18 63. Plaintiff is entitled to attorney's fees pursuant to Civil Code section 52.1(h).

19 **VI**

20 **FIFTH CAUSE OF ACTION**

21 **(Defamation against SFSFC and**

22 **Does 1 through 30)**

23 64. Plaintiff incorporates the allegations contained in paragraphs 1 through 63 of
24 this Complaint as if fully set forth herein, and incorporate those allegations verbatim herein
25 by this reference.

26 65. On or about January 2, 2018, SFSFC posted on its official social media the
27 following statement: “Worldcon 76 has chosen to reduce Jonathan Del Arroz’s
28 membership from attending to supporting. He will not be allowed to attend the convention

1 in person. Mr. Del Arroz's supporting membership preserves his rights to participate in the
2 Hugo Awards nomination and voting process. He was informed of our decision via email.
3 We have taken this step because he has made it clear that he fully intends to break our code
4 of conduct. We take that seriously. Worldcon 76 strives to be an inclusive place in fandom,
5 as difficult as that can be, and racist and bullying behavior is not acceptable at our
6 Worldcon. This expulsion is one step toward eliminating such behavior and was not taken
7 lightly. The senior staff and board are in agreement about the decision and it is final."

8 66. This statement was also false in several ways. As noted previously, Mr. Del
9 Arroz never stated any intent to violate any code of conduct. Worldcon 76 never explained
10 to him that anything he planned on doing would constitute a violation of any code of
11 conduct. Mr. Del Arroz is unaware of any such code of conduct. Mr. Del Arroz is informed
12 and believes and thereon alleges that there is no such code of conduct and that his conduct
13 would not have violated such a code of conduct. Further, Mr. Del Arroz is not a racist. Mr.
14 Del Arroz has often made a point of condemning racism and proudly identifying his
15 Hispanic heritage. Likewise, Mr. Del Arroz is not a bully. The statement that Mr. Del
16 Arroz is a racist bully is false and SFSFC and its representatives knew it was false or made
17 the statement with a reckless disregard for the truth or falsity of the charge and with a
18 malicious intent to injure Mr. Del Arroz or his reputation. The statement was published by
19 SFSFC and its representatives in order to maliciously injure Mr. Del Arroz's reputation and
20 to retaliate against him based on his political affiliations.

21 67. After this statement was posted, SFSFC prevented anyone from posting any
22 more comments on the subject of the ban.

23 68. As a proximate result of Defendants', and each of their, conduct, Mr. Del
24 Arroz has been financially damaged with respect to lost sales he would have made at
25 WorldCon76 and as to lost book sales arising from the injury to his reputation as an author
26 as a result of the banning in an amount to be proven at trial. In addition, as a proximate
27 result of Defendants', and each of their, conduct, Mr. Del Arroz has suffered emotional
28

1 distress, including embarrassment, humiliation, anguish, stress and depression as a result of
2 Defendants' unlawful and unfair treatment.

3 69. Defendants' and each of their conduct was fraudulent, oppressive, and
4 malicious in that said Defendants were aware that they were threatening Mr. Del Arroz
5 with physical violence in order to prevent him from exercising his important civil rights
6 including the right of association and the right to use public property and the right to free
7 and equal treatment by business establishments. Mr. Del Arroz is therefore entitled to an
8 award of punitive damages according to proof.

9 WHEREFORE, Plaintiff prays judgment as follows:

- 10 1. For compensatory damages according to proof;
- 11 2. For penalties pursuant to Civil Code sections 52 and 52.1 as pled;
- 12 3. For attorney's fees pursuant to Civil Code sections 52 and 52.1 as pled;
- 13 4. For presumed damages for defamation;
- 14 5. For punitive damages according to proof;
- 15 6. For costs of suit herein incurred; and
- 16 7. For such other and further relief as the Court deems proper.

17
18
19 Dated: April 10, 2018

Law Office of Peter Sean Bradley

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21 By 

22 Peter Sean Bradley
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SUPERIOR COURT OF CALIFORNIA

County of San Joaquin
180 E Weber Avenue
Stockton, CA 95202

NOTICE OF CASE ASSIGNMENT AND NOTICE OF HEARING

Case Number: **STK-CV-UMC-2018-0004397**

A Case Management Conference has been scheduled for your case as indicated below. A copy of this information must be provided with the complaint or petition, and with any cross-complaint that names a new party to the underlying action. Disregard hearing date if that date has expired.

Hearing: Case Management Conference	Date: 10/15/2018	Time: 8:45 AM	
JUDGE	COURT LOCATION	DEPARTMENT	PHONE Numbers:
Carter Holly	Stockton	10B	Stockton: 209-992-5693 Lodi: 209-992-5522

[x] ADR & Scheduling Information is available on court website @ sjcourts.org/self-help

1. You must:

- Serve** all named defendant's and file proofs of service on those defendants with the court Within 60 days of the filing of the complaint. (CRC 3.110)
- File and serve** a completed Case Management Conference Statement (use of JC form CM-110 is mandatory) at least 15 days before the Case Management Conference.
- Meet and Confer**, in person or by telephone, to consider each of the issues identified in CRC 3.727 no later than 30 calendar days before the date set for the Case Management Conference. (CRC 3.724)
- Collection cases** are managed pursuant to CRC 3.740.

2. You may appear in person or by telephone at the Case Management Conference. To make arrangements for telephonic appearance you must call Court Call, at (310) 572-4670 or (888) 882-6878 at least five (5) court days prior to the hearing.

Visit our website @ www.sjcourts.org for more information regarding civil cases, local rules and forms.

Date: 04/16/2018

Enedina Lisitsin, Deputy Clerk

NOTICE OF CASE ASSIGNMENT AND NOTICE OF HEARING

EXHIBIT "B"

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Ann A.P. Nguyen

SBN: 178712

Messner Reeves LLP

160 W. Santa Clara Street, #1000, San Jose, CA 95113

TELEPHONE NO.: (408)298-7120

FAX NO. (Optional): (408)298-0477

E-MAIL ADDRESS (Optional): anguyen@messner.com

ATTORNEY FOR (Name): San Francisco Science Fiction Conventions, Inc.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA

Downtown Superior Court

191 North First Street, San Jose, CA 95113

SHORT TITLE OF CASE: Del Arroz v. San Francisco Science Fiction Conventions, Inc., et al.

FORM INTERROGATORIES—GENERAL**Asking Party:** Defendant San Francisco Science Fiction Conventions, Inc.

CASE NUMBER:

18-CV-334547

Answering Party: Plaintiff Jonathan Del Arroz**Set No.:** One**Sec. 1. Instructions to All Parties**

(a) Interrogatories are written questions prepared by a party to an action that are sent to any other party in the action to be answered under oath. The interrogatories below are form interrogatories approved for use in civil cases.

(b) For time limitations, requirements for service on other parties, and other details, see Code of Civil Procedure sections 2030.010–2030.410 and the cases construing those sections.

(c) These form interrogatories do not change existing law relating to interrogatories nor do they affect an answering party's right to assert any privilege or make any objection.

Sec. 2. Instructions to the Asking Party

(a) These interrogatories are designed for optional use by parties in unlimited civil cases where the amount demanded exceeds \$25,000. Separate interrogatories, *Form Interrogatories—Limited Civil Cases (Economic Litigation)* (form DISC-004), which have no subparts, are designed for use in limited civil cases where the amount demanded is \$25,000 or less; however, those interrogatories may also be used in unlimited civil cases.

(b) Check the box next to each interrogatory that you want the answering party to answer. Use care in choosing those interrogatories that are applicable to the case.

(c) You may insert your own definition of **INCIDENT** in Section 4, but only where the action arises from a course of conduct or a series of events occurring over a period of time.

(d) The interrogatories in section 16.0, Defendant's Contentions—Personal Injury, should not be used until the defendant has had a reasonable opportunity to conduct an investigation or discovery of plaintiff's injuries and damages.

(e) Additional interrogatories may be attached.

Sec. 3. Instructions to the Answering Party

(a) An answer or other appropriate response must be given to each interrogatory checked by the asking party.

(b) As a general rule, within 30 days after you are served with these interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Code of Civil Procedure sections 2030.260–2030.270 for details.

(c) Each answer must be as complete and straightforward as the information reasonably available to you, including the information possessed by your attorneys or agents, permits. If an interrogatory cannot be answered completely, answer it to the extent possible.

(d) If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.

(e) Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.

(f) Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information.

(g) If you are asserting a privilege or making an objection to an interrogatory, you must specifically assert the privilege or state the objection in your written response.

(h) Your answers to these interrogatories must be verified, dated, and signed. You may wish to use the following form at the end of your answers:

I declare under penalty of perjury under the laws of the State of California that the foregoing answers are true and correct.

(DATE)

(SIGNATURE)

Sec. 4. Definitions

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

(a) (Check one of the following):

- ☐ (1) **INCIDENT** includes the circumstances and events surrounding the alleged accident, injury, or other occurrence or breach of contract giving rise to this action or proceeding.

- ☒ (2) **INCIDENT** means (insert your definition here or on a separate, attached sheet labeled "Sec. 4(a)(2)"): the circumstances and events surrounding your claim for defamation giving rise to this action

(b) YOU OR ANYONE ACTING ON YOUR BEHALF

includes you, your agents, your employees, your insurance companies, their agents, their employees, your attorneys, your accountants, your investigators, and anyone else acting on your behalf.

(c) **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.

(d) **DOCUMENT** means a writing, as defined in Evidence Code section 250, and includes the original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically stored information, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.

(e) **HEALTH CARE PROVIDER** includes any **PERSON** referred to in Code of Civil Procedure section 667.7(e)(3).

(f) **ADDRESS** means the street address, including the city, state, and zip code.

Sec. 5. Interrogatories

The following interrogatories have been approved by the Judicial Council under Code of Civil Procedure section 2033.710:

CONTENTS

- 1.0 Identity of Persons Answering These Interrogatories
- 2.0 General Background Information—Individual
- 3.0 General Background Information—Business Entity
- 4.0 Insurance
- 5.0 [Reserved]
- 6.0 Physical, Mental, or Emotional Injuries
- 7.0 Property Damage
- 8.0 Loss of Income or Earning Capacity
- 9.0 Other Damages
- 10.0 Medical History
- 11.0 Other Claims and Previous Claims
- 12.0 Investigation—General
- 13.0 Investigation—Surveillance
- 14.0 Statutory or Regulatory Violations
- 15.0 Denials and Special or Affirmative Defenses
- 16.0 Defendant's Contentions Personal Injury
- 17.0 Responses to Request for Admissions
- 18.0 [Reserved]
- 19.0 [Reserved]
- 20.0 How the Incident Occurred—Motor Vehicle
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 60.0 [Reserved]
- 70.0 Unlawful Detainer [See separate form DISC-003]
- 101.0 Economic Litigation [See separate form DISC-004]
- 200.0 Employment Law [See separate form DISC-002]
- Family Law [See separate form FL-145]

1.0 Identity of Persons Answering These Interrogatories

- ☒ 1.1 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

2.0 General Background Information—individual

- ☒ 2.1 State:
- (a) your name;
 - (b) every name you have used in the past; and
 - (c) the dates you used each name.
- ☒ 2.2 State the date and place of your birth.
- ☒ 2.3 At the time of the **INCIDENT**, did you have a driver's license? If so state:
- (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- ☒ 2.4 At the time of the **INCIDENT**, did you have any other permit or license for the operation of a motor vehicle? If so, state:
- (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- ☒ 2.5 State:
- (a) your present residence **ADDRESS**;
 - (b) your residence **ADDRESSES** for the past five years; and
 - (c) the dates you lived at each **ADDRESS**.
- ☒ 2.6 State:
- (a) the name, **ADDRESS**, and telephone number of your present employer or place of self-employment; and
 - (b) the name, **ADDRESS**, dates of employment, job title, and nature of work for each employer or self-employment you have had from five years before the **INCIDENT** until today.
- ☒ 2.7 State:
- (a) the name and **ADDRESS** of each school or other academic or vocational institution you have attended, beginning with high school;
 - (b) the dates you attended;
 - (c) the highest grade level you have completed; and
 - (d) the degrees received.
- ☒ 2.8 Have you ever been convicted of a felony? If so, for each conviction state:
- (a) the city and state where you were convicted;
 - (b) the date of conviction;
 - (c) the offense; and
 - (d) the court and case number.
- ☒ 2.9 Can you speak English with ease? If not, what language and dialect do you normally use?
- ☒ 2.10 Can you read and write English with ease? If not, what language and dialect do you normally use?

- ☒ 2.11 At the time of the **INCIDENT** were you acting as an agent or employee for any **PERSON**? If so, state:
- (a) the name, **ADDRESS**, and telephone number of that **PERSON**; and
 - (b) a description of your duties.

- ☒ 2.12 At the time of the **INCIDENT** did you or any other person have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the **INCIDENT**? If so, for each person state:
- (a) the name, **ADDRESS**, and telephone number;
 - (b) the nature of the disability or condition; and
 - (c) the manner in which the disability or condition contributed to the occurrence of the **INCIDENT**.

- ☒ 2.13 Within 24 hours before the **INCIDENT** did you or any person involved in the **INCIDENT** use or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of any kind (prescription or not)? If so, for each person state:
- (a) the name, **ADDRESS**, and telephone number;
 - (b) the nature or description of each substance;
 - (c) the quantity of each substance used or taken;
 - (d) the date and time of day when each substance was used or taken;
 - (e) the **ADDRESS** where each substance was used or taken;
 - (f) the name, **ADDRESS**, and telephone number of each person who was present when each substance was used or taken; and
 - (g) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who prescribed or furnished the substance and the condition for which it was prescribed or furnished.

3.0 General Background Information—Business Entity

- ☐ 3.1 Are you a corporation? If so, state:
- (a) the name stated in the current articles of incorporation;
 - (b) all other names used by the corporation during the past 10 years and the dates each was used;
 - (c) the date and place of incorporation;
 - (d) the **ADDRESS** of the principal place of business; and
 - (e) whether you are qualified to do business in California.
- ☐ 3.2 Are you a partnership? If so, state:
- (a) the current partnership name;
 - (b) all other names used by the partnership during the past 10 years and the dates each was used;
 - (c) whether you are a limited partnership and, if so, under the laws of what jurisdiction;
 - (d) the name and **ADDRESS** of each general partner; and
 - (e) the **ADDRESS** of the principal place of business.
- ☐ 3.3 Are you a limited liability company? If so, state:
- (a) the name stated in the current articles of organization;
 - (b) all other names used by the company during the past 10 years and the date each was used;
 - (c) the date and place of filing of the articles of organization;
 - (d) the **ADDRESS** of the principal place of business; and
 - (e) whether you are qualified to do business in California.

- ☐ 3.4 Are you a joint venture? If so, state:
- (a) the current joint venture name;
 - (b) all other names used by the joint venture during the past 10 years and the dates each was used;
 - (c) the name and **ADDRESS** of each joint venturer; and
 - (d) the **ADDRESS** of the principal place of business.

- ☐ 3.5 Are you an unincorporated association? If so, state:
- (a) the current unincorporated association name;
 - (b) all other names used by the unincorporated association during the past 10 years and the dates each was used; and
 - (c) the **ADDRESS** of the principal place of business.

- ☐ 3.6 Have you done business under a fictitious name during the past 10 years? If so, for each fictitious name state:
- (a) the name;
 - (b) the dates each was used;
 - (c) the state and county of each fictitious name filing; and
 - (d) the **ADDRESS** of the principal place of business.

- ☐ 3.7 Within the past five years has any public entity registered or licensed your business? If so, for each license or registration:
- (a) identify the license or registration;
 - (b) state the name of the public entity; and
 - (c) state the dates of issuance and expiration.

4.0 Insurance

- ☒ 4.1 At the time of the **INCIDENT**, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, for each policy state:
- (a) the kind of coverage;
 - (b) the name and **ADDRESS** of the insurance company;
 - (c) the name, **ADDRESS**, and telephone number of each named insured;
 - (d) the policy number;
 - (e) the limits of coverage for each type of coverage contained in the policy;
 - (f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
 - (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.

- ☒ 4.2 Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, specify the statute.

5.0 [Reserved]

6.0 Physical, Mental, or Emotional Injuries

- ☒ 6.1 Do you attribute any physical, mental, or emotional injuries to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 6.2 through 6.7).

- ☒ 6.2 Identify each injury you attribute to the **INCIDENT** and the area of your body affected.

☒ 6.3 Do you still have any complaints that you attribute to the **INCIDENT**? If so, for each complaint state:

- (a) a description;
- (b) whether the complaint is subsiding, remaining the same, or becoming worse; and
- (c) the frequency and duration.

☒ 6.4 Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **INCIDENT**? If so, for each **HEALTH CARE PROVIDER** state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the type of consultation, examination, or treatment provided;
- (c) the dates you received consultation, examination, or treatment; and
- (d) the charges to date.

☒ 6.5 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the **INCIDENT**? If so, for each medication state:

- (a) the name;
- (b) the **PERSON** who prescribed or furnished it;
- (c) the date it was prescribed or furnished;
- (d) the dates you began and stopped taking it; and
- (e) the cost to date.

☒ 6.6 Are there any other medical services necessitated by the injuries that you attribute to the **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for each service state:

- (a) the nature;
- (b) the date;
- (c) the cost; and
- (d) the name, **ADDRESS**, and telephone number of each provider.

☒ 6.7 Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **INCIDENT**? If so, for each injury state:

- (a) the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
- (b) the complaints for which the treatment was advised; and
- (c) the nature, duration, and estimated cost of the treatment.

7.0 Property Damage

☒ 7.1 Do you attribute any loss of or damage to a vehicle or other property to the **INCIDENT**? If so, for each item of property:

- (a) describe the property;
- (b) describe the nature and location of the damage to the property;

- (c) state the amount of damage you are claiming for each item of property and how the amount was calculated; and
- (d) if the property was sold, state the name, **ADDRESS**, and telephone number of the seller, the date of sale, and the sale price.

☒ 7.2 Has a written estimate or evaluation been made for any item of property referred to in your answer to the preceding interrogatory? If so, for each estimate or evaluation state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON** who prepared it and the date prepared;
- (b) the name, **ADDRESS**, and telephone number of each **PERSON** who has a copy of it; and
- (c) the amount of damage stated.

☒ 7.3 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so, for each item state:

- (a) the date repaired;
- (b) a description of the repair;
- (c) the repair cost;
- (d) the name, **ADDRESS**, and telephone number of the **PERSON** who repaired it;
- (e) the name, **ADDRESS**, and telephone number of the **PERSON** who paid for the repair.

8.0 Loss of Income or Earning Capacity

☒ 8.1 Do you attribute any loss of income or earning capacity to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 8.2 through 8.8).

☒ 8.2 State:

- (a) the nature of your work;
- (b) your job title at the time of the **INCIDENT**; and
- (c) the date your employment began.

☒ 8.3 State the last date before the **INCIDENT** that you worked for compensation.

☒ 8.4 State your monthly income at the time of the **INCIDENT** and how the amount was calculated.

☒ 8.5 State the date you returned to work at each place of employment following the **INCIDENT**.

☒ 8.6 State the dates you did not work and for which you lost income as a result of the **INCIDENT**.

☒ 8.7 State the total income you have lost to date as a result of the **INCIDENT** and how the amount was calculated.

☒ 8.8 Will you lose income in the future as a result of the **INCIDENT**? If so, state:

- (a) the facts upon which you base this contention;
- (b) an estimate of the amount;
- (c) an estimate of how long you will be unable to work; and
- (d) how the claim for future income is calculated.

9.0 Other Damages

☒ 9.1 Are there any other damages that you attribute to the **INCIDENT**? If so, for each item of damage state:

- (a) the nature;
- (b) the date it occurred;
- (c) the amount; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** to whom an obligation was incurred.

☒ 9.2 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in interrogatory 9.1? If so, describe each document and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

10.0 Medical History

☐ 10.1 At any time before the **INCIDENT** did you have complaints or injuries that involved the same part of your body claimed to have been injured in the **INCIDENT**? If so, for each state:

- (a) a description of the complaint or injury;
- (b) the dates it began and ended; and
- (c) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** whom you consulted or who examined or treated you.

☐ 10.2 List all physical, mental, and emotional disabilities you had immediately before the **INCIDENT**. *(You may omit mental or emotional disabilities unless you attribute any mental or emotional injury to the **INCIDENT**.)*

☐ 10.3 At any time after the **INCIDENT**, did you sustain injuries of the kind for which you are now claiming damages? If so, for each incident giving rise to an injury state:

- (a) the date and the place it occurred;
- (b) the name, **ADDRESS**, and telephone number of any other **PERSON** involved;
- (c) the nature of any injuries you sustained;
- (d) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** who you consulted or who examined or treated you; and
- (e) the nature of the treatment and its duration.

11.0 Other Claims and Previous Claims

☐ 11.1 Except for this action, in the past 10 years have you filed an action or made a written claim or demand for compensation for your personal injuries? If so, for each action, claim, or demand state:

- (a) the date, time, and place and location (closest street **ADDRESS** or intersection) of the **INCIDENT** giving rise to the action, claim, or demand;
- (b) the name, **ADDRESS**, and telephone number of each **PERSON** against whom the claim or demand was made or the action filed;

- (c) the court, names of the parties, and case number of any action filed;
- (d) the name, **ADDRESS**, and telephone number of any attorney representing you;
- (e) whether the claim or action has been resolved or is pending; and
- (f) a description of the injury.

☐ 11.2 In the past 10 years have you made a written claim or demand for workers' compensation benefits? If so, for each claim or demand state:

- (a) the date, time, and place of the **INCIDENT** giving rise to the claim;
- (b) the name, **ADDRESS**, and telephone number of your employer at the time of the injury;
- (c) the name, **ADDRESS**, and telephone number of the workers' compensation insurer and the claim number;
- (d) the period of time during which you received workers' compensation benefits;
- (e) a description of the injury;
- (f) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who provided services; and
- (g) the case number at the Workers' Compensation Appeals Board.

12.0 Investigation—General

☒ 12.1 State the name, **ADDRESS**, and telephone number of each individual:

- (a) who witnessed the **INCIDENT** or the events occurring immediately before or after the **INCIDENT**;
- (b) who made any statement at the scene of the **INCIDENT**;
- (c) who heard any statements made about the **INCIDENT** by any individual at the scene; and
- (d) who **YOU OR ANYONE ACTING ON YOUR BEHALF** claim has knowledge of the **INCIDENT** (except for expert witnesses covered by Code of Civil Procedure section 2034).

☒ 12.2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **INCIDENT**? If so, for each individual state:

- (a) the name, **ADDRESS**, and telephone number of the individual interviewed;
- (b) the date of the interview; and
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.

☒ 12.3 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **INCIDENT**? If so, for each statement state:

- (a) the name, **ADDRESS**, and telephone number of the individual from whom the statement was obtained;
- (b) the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
- (c) the date the statement was obtained; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

☒ 12.4 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs, films, or videotapes depicting any place, object, or individual concerning the **INCIDENT** or plaintiff's injuries? If so, state:

- (a) the number of photographs or feet of film or videotape;
- (b) the places, objects, or persons photographed, filmed, or videotaped;
- (c) the date the photographs, films, or videotapes were taken;
- (d) the name, **ADDRESS**, and telephone number of the individual taking the photographs, films, or videotapes; and
- (e) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the photographs, films, or videotapes.

☒ 12.5 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) concerning the **INCIDENT**? If so, for each item state:

- (a) the type (i.e., diagram, reproduction, or model);
- (b) the subject matter; and
- (c) the name, **ADDRESS**, and telephone number of each **PERSON** who has it.

☒ 12.6 Was a report made by any **PERSON** concerning the **INCIDENT**? If so, state:

- (a) the name, title, identification number, and employer of the **PERSON** who made the report;
- (b) the date and type of report made;
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** for whom the report was made; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the report.

☒ 12.7 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** inspected the scene of the **INCIDENT**? If so, for each inspection state:

- (a) the name, **ADDRESS**, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310); and
- (b) the date of the inspection.

13.0 Investigation—Surveillance

☒ 13.1 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** conducted surveillance of any individual involved in the **INCIDENT** or any party to this action? If so, for each surveillance state:

- (a) the name, **ADDRESS**, and telephone number of the individual or party;
- (b) the time, date, and place of the surveillance;
- (c) the name, **ADDRESS**, and telephone number of the individual who conducted the surveillance; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of any surveillance photograph, film, or videotape.

☒ 13.2 Has a written report been prepared on the surveillance? If so, for each written report state:

- (a) the title;
- (b) the date;
- (c) the name, **ADDRESS**, and telephone number of the individual who prepared the report; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy.

14.0 Statutory or Regulatory Violations

☒ 14.1 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** contend that any **PERSON** involved in the **INCIDENT** violated any statute, ordinance, or regulation and that the violation was a legal (proximate) cause of the **INCIDENT**? If so, identify the name, **ADDRESS**, and telephone number of each **PERSON** and the statute, ordinance, or regulation that was violated.

☒ 14.2 Was any **PERSON** cited or charged with a violation of any statute, ordinance, or regulation as a result of this **INCIDENT**? If so, for each **PERSON** state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) the statute, ordinance, or regulation allegedly violated;
- (c) whether the **PERSON** entered a plea in response to the citation or charge and, if so, the plea entered; and
- (d) the name and **ADDRESS** of the court or administrative agency, names of the parties, and case number.

15.0 Denials and Special or Affirmative Defenses

☐ 15.1 Identify each denial of a material allegation and each special or affirmative defense in your pleadings and for each:

- (a) state all facts upon which you base the denial or special or affirmative defense;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your denial or special or affirmative defense, and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

16.0 Defendant's Contentions—Personal Injury

☐ 16.1 Do you contend that any **PERSON**, other than you or plaintiff, contributed to the occurrence of the **INCIDENT** or the injuries or damages claimed by plaintiff? If so, for each **PERSON**:

- (a) state the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.2 Do you contend that plaintiff was not injured in the **INCIDENT**? If so:

- (a) state all facts upon which you base your contention;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.3 Do you contend that the injuries or the extent of the injuries claimed by plaintiff as disclosed in discovery proceedings thus far in this case were not caused by the **INCIDENT**? If so, for each injury:

- (a) identify it;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.4 Do you contend that any of the services furnished by any **HEALTH CARE PROVIDER** claimed by plaintiff in discovery proceedings thus far in this case were not due to the **INCIDENT**? If so:

- (a) identify each service;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.5 Do you contend that any of the costs of services furnished by any **HEALTH CARE PROVIDER** claimed as damages by plaintiff in discovery proceedings thus far in this case were not necessary or unreasonable? If so:

- (a) identify each cost;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.6 Do you contend that any part of the loss of earnings or income claimed by plaintiff in discovery proceedings thus far in this case was unreasonable or was not caused by the **INCIDENT**? If so:

- (a) identify each part of the loss;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.7 Do you contend that any of the property damage claimed by plaintiff in discovery Proceedings thus far in this case was not caused by the **INCIDENT**? If so:

- (a) identify each item of property damage;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.8 Do you contend that any of the costs of repairing the property damage claimed by plaintiff in discovery proceedings thus far in this case were unreasonable? If so:

- (a) identify each cost item;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.9 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** (for example, insurance bureau index reports) concerning claims for personal injuries made before or after the **INCIDENT** by a plaintiff in this case? If so, for each plaintiff state:

- (a) the source of each **DOCUMENT**;
- (b) the date each claim arose;
- (c) the nature of each claim; and
- (d) the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

☐ 16.10 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** concerning the past or present physical, mental, or emotional condition of any plaintiff in this case from a **HEALTH CARE PROVIDER** not previously identified (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310)? If so, for each plaintiff state:

- (a) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER**;
- (b) a description of each **DOCUMENT**; and
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

17.0 Responses to Request for Admissions

☒ 17.1 Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:

- (a) state the number of the request;
- (b) state all facts upon which you base your response;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

18.0 [Reserved]

19.0 [Reserved]

20.0 How the Incident Occurred—Motor Vehicle

☐ 20.1 State the date, time, and place of the **INCIDENT** (closest street **ADDRESS** or intersection).

☐ 20.2 For each vehicle involved in the **INCIDENT**, state:

- (a) the year, make, model, and license number;
- (b) the name, **ADDRESS**, and telephone number of the driver;

- (c) the name, **ADDRESS**, and telephone number of each occupant other than the driver;
- (d) the name, **ADDRESS**, and telephone number of each registered owner;
- (e) the name, **ADDRESS**, and telephone number of each lessee;
- (f) the name, **ADDRESS**, and telephone number of each owner other than the registered owner or lien holder; and
- (g) the name of each owner who gave permission or consent to the driver to operate the vehicle.

☐ 20.3 State the **ADDRESS** and location where your trip began and the **ADDRESS** and location of your destination.

☐ 20.4 Describe the route that you followed from the beginning of your trip to the location of the **INCIDENT**, and state the location of each stop, other than routine traffic stops, during the trip leading up to the **INCIDENT**.

☐ 20.5 State the name of the street or roadway, the lane of travel, and the direction of travel of each vehicle involved in the **INCIDENT** for the 500 feet of travel before the **INCIDENT**.

☐ 20.6 Did the **INCIDENT** occur at an intersection? If so, describe all traffic control devices, signals, or signs at the intersection.

☐ 20.7 Was there a traffic signal facing you at the time of the **INCIDENT**? If so, state:

- (a) your location when you first saw it;
- (b) the color;
- (c) the number of seconds it had been that color; and
- (d) whether the color changed between the time you first saw it and the **INCIDENT**.

☐ 20.8 State how the **INCIDENT** occurred, giving the speed, direction, and location of each vehicle involved:

- (a) just before the **INCIDENT**;
- (b) at the time of the **INCIDENT**; and (c) just after the **INCIDENT**.

☐ 20.9 Do you have information that a malfunction or defect in a vehicle caused the **INCIDENT**? If so:

- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.

☐ 20.10 Do you have information that any malfunction or defect in a vehicle contributed to the injuries sustained in the **INCIDENT**? If so:

- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and

(d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.

☐ 20.11 State the name, **ADDRESS**, and telephone number of each owner and each **PERSON** who has had possession since the **INCIDENT** of each vehicle involved in the **INCIDENT**.

25.0 *[Reserved]*

30.0 *[Reserved]*

40.0 *[Reserved]*

50.0 Contract

☐ 50.1 For each agreement alleged in the pleadings:

- (a) identify each **DOCUMENT** that is part of the agreement and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (b) state each part of the agreement not in writing, the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to that provision, and the date that part of the agreement was made;
- (c) identify all **DOCUMENTS** that evidence any part of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (d) identify all **DOCUMENTS** that are part of any modification to the agreement, and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (e) state each modification not in writing, the date, and the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to the modification, and the date the modification was made;
- (f) identify all **DOCUMENTS** that evidence any modification of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**.

☐ 50.2 Was there a breach of any agreement alleged in the pleadings? If so, for each breach describe and give the date of every act or omission that you claim is the breach of the agreement.

☐ 50.3 Was performance of any agreement alleged in the pleadings excused? If so, identify each agreement excused and state why performance was excused.

☐ 50.4 Was any agreement alleged in the pleadings terminated by mutual agreement, release, accord and satisfaction, or novation? If so, identify each agreement terminated, the date of termination, and the basis of the termination.

☐ 50.5 Is any agreement alleged in the pleadings unenforceable? If so, identify each unenforceable agreement and state why it is unenforceable.

☐ 50.6 Is any agreement alleged in the pleadings ambiguous? If so, identify each ambiguous agreement and state why it is ambiguous.

60.0 *[Reserved]*

PROOF OF SERVICE

**ARROZ v. SAN FRANCISCO SCIENCE FICTION CONVENTIONS, INC., et al.
Case No. 18-CV-334547**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Santa Clara, State of California. My business address is 160 W. Santa Clara Street, Suite 1000, San Jose, CA 95113.

On August 19, 2019, I served true copies of the following document(s) described as
FORM INTERROGATORIES on the interested parties in this action as follows:

Peter Sean Bradley, Esq.	Attorneys for Plaintiff,
LAW OFFICES OF PETER SEAN BRADLEY	JONATHAN DEL ARROZ
7045 North Fruit Avenue	
Fresno, California 93711-0761	
Telephone: (559) 431-3142	
Facsimile: (559) 436-1135	
Email: penner.bradley@sbcglobal.net	

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Messner Reeves LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at San Jose, California.

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

Executed on August 19, 2019, at San Jose, California.



April M. Kitagawa

EXHIBIT "C"

1 Peter Sean Bradley, Esq. SBN 109258
7045 North Fruit Avenue
2 Fresno, California 93711
Telephone No.: (559) 431-3142
3 Facsimile No.: (559) 436-1135

4 Attorney for Plaintiff,
Jonathan Del Arroz
5

6
7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF SANTA CLARA**
9

10 JONATHAN DEL ARROZ,

11 Plaintiff,

12 v.

13 SAN FRANCISCO SCIENCE FICTION
14 CONVENTIONS, INC. ("SFSFC") aka
"WORLDCON76" David W. Gallaher (2019),
15 President; David W. Clark (2020), Vice
President; Lise Detusch Harrigan (2020),
16 Treasurer; Kevin Standlee (2018), Secretary;
Sandra Childress (2019); Bruce Farr (2018),
17 Chair; 2018 SMOF Con Committee; Cheryl
Morgan (2020); Kevin Roche (2018), Chair;
18 2018 Worldcon (Worldcon 76) Committee;
Cindy Scott (2018); Randy Smith (2019),
19 Chair; New Zealand 2020 Worldcon Agent
Committee; Andy Trembley (2020); Jennifer
20 "Radar" Wylie (2019), Chair; CostumeCon
2021 Organizing Committee; Lori
21 Buschhaum; Susie Rodriguez and DOES 1
through 30, inclusive.,,
22

23 Defendant.

24 PROPOUNDING PARTY : Defendant SAN FRANCISCO SCIENCE FICTION
CONVENTIONS, INC. ("SFSFC")

25 RESPONDING PARTY : Plaintiff JONATHAN DEL ARROZ

26 SET NUMBER : ONE
27
28

) Case No.: 18-CV-33547
)
)
)

) **PLAINTIFF'S RESPONSES TO**
) **DEFENDANT'S FORM**
) **INTERROGATORIES, SET**
) **NO. 1**

General Objections:

1. All Form Interrogatories have been given a reasonable construction.
2. It is a misuse of discovery to request information or documents which are privilege. Accordingly, all Form Interrogatories have been construed as not requesting privileged information and all Form Interrogatories are objected to insofar as they could be construed as making such a request.
3. The term "all facts" is construed as being reasonably limited to the "call of the question." To the extent that any Form Interrogatory is not so limited, it is objected to as being overbroad and unreasonably burdensome and oppressive.
4. Respondent objects to any request to produce a document produced, generated, written or maintained by Propounding Party on the grounds that such document is equally available to Propounding Party and requiring Respondent to produce such document is unduly burdensome and harassment.
5. The term "support or relate," or any variation thereof, is construed as being reasonably limited to the "call of the question." To the extent that any Interrogatory is not so limited, it is objected to as being overbroad and unreasonably burdensome and oppressive.

1.0 Jonathan Del Arroz, 580 Old Farm Rd. Danville, CA 94526 (925) 683-9934; Peter Sean Bradley, 7045 N. Fruit, Fresno, CA 93711.

2.0 Jon Del Arroz.

2.2 9/11/1982; Walnut Creek, CA

2.3 Yes. California. B8680716 10/12/17 issuance

2.4 No

2.5 (a) – (c) 580 Old Farm Rd. Danville, CA 94526.

2.6 Property manager, Kidder Mathews, Inc. 5050 Hopyard Rd. Suite 350 Pleasanton, CA 94588

2.7 Valley Christian High School, Dublin, CA 1997-2001. Diablo Valley College 2001-2003. University of California at Berkeley 2003-2006. Received Bachelor's in Business Administration.

2.8 None.

1 2.9 Yes.

2 2.10 Yes.

3 2.11 No.

4 2.12 No.

5 2.13 No.

6 4.1 No.

7 4.2 No.

8 6.1 Yes.

9 6.2 Respondent suffered emotional distress as a result of the defamation.

10 6.3 Yes. (a) Respondent continues to experience shame, anxiety, humiliation, embarrassment,
11 and depression as a result of the depression. (b) Remaining the same; (c) daily as the subject is
12 relieved.

13 6.4 No

14 6.5 No

15 6.6 No

16 6.7 No

17 7.1 Respondent understands the term "other property to mean tangible property and states "no."

18 7.2 No

19 7.3 No

20 8.1 Respondent objects to this interrogatory as vague and ambiguous in the context of the present
21 case. This interrogatory is directed to a loss of income or earning capacity as earnings from an
22 occupation or employment. Respondent has lost income in the sense of losing sales volume from
23 selling his book.

24 8.2 (a) – (c) Respondent objects to this interrogatory on the grounds that it is irrelevant to the
25 issues in the present case as broadly phrased, invades privacy and is unduly burdensome and
26 oppressive. As relevant to this case, Respondent was a writer who had been involved in writing
27 prior to WorldCon76.

28 8.3 Respondent objects to this interrogatory on the grounds that it is irrelevant and incoherent to
the issues in the present case as broadly phrased, invades privacy and is unduly burdensome and
oppressive. Respondent did not have a regular time and place of work in the sense meant in the
interrogatory.

1 8.4 Respondent objects to this interrogatory on the grounds that it is irrelevant and incoherent to
2 the issues in the present case as broadly phrased, invades privacy and is unduly burdensome and
3 oppressive. Respondent did not have monthly income from writing in the sense meant in the
4 interrogatory.

5 8.5 Respondent objects to this interrogatory on the grounds that it is irrelevant and incoherent to
6 the issues in the present case as broadly phrased, invades privacy and is unduly burdensome and
7 oppressive. Respondent did not have a regular place of employment to return as meant in the
8 sense of the interrogatory.

9 8.6 Respondent objects to this interrogatory on the grounds that it is irrelevant and incoherent to
10 the issues in the present case as broadly phrased, invades privacy and is unduly burdensome and
11 oppressive. Respondent did not miss work as a result of the conduct of defendant.

12 8.7 Based on his prior experience in selling books at other conventions, he expected to sell
13 approximately 60 to 100 books for a profit of \$1,200 to \$2,000. He was prevented from making
14 such sales by defendant. At the time of WorldCon76 Del Arroz launched a book called "The
15 Stars Entwined" which had sales 1/6th of his prior sales of his book "For Steam and Country."
16 The lost sales represented lost sales of approximately one thousand books or lost profits of
17 approximately \$5,000. Other book sales of Del Arroz's books were also affected.

18 8.8 Respondent does not presently know the extent of such future loss in book sales.

19 9.1 Respondent objects to the term "other damages" as vague and ambiguous. Respondent
20 understands that the term does not include emotional distress or lost sales of books to the public.
21 Without waiving, Yes.

22 (a) Injury to reputation.

23 (b) Upon publication of the statement that described respondent as a racist bully; approximately
24 January 4, 2018.

25 (c) The valuation of the reputational injury is left to the determination of the jury according to
26 the facts and circumstances of the injury. Respondent believes that the notorious, vicious and
27 unjustified slander in the present case merits an award of \$1 million.

28 (a) – (c) Pecuniary damages for lost sales: Del Arroz intended to sell his books at WorldCon
76. Based on his prior experience in selling books at other conventions, he expected to sell
approximately 60 to 100 books for a profit of \$1,200 to \$2,000. He was prevented from making
such sales by defendant. At the time of WorldCon76 Del Arroz launched a book called "The

1 Stars Entwined” which had sales 1/6th of his prior sales of his book “For Steam and Country.”

2 The lost sales represented lost sales of approximately one thousand books or lost profits of
3 approximately \$5,000. Other book sales of Del Arroz’s books were also affected. Persons with
4 knowledge of the defamation include: Jonathan Del Arroz, Lou Antonelli, Robert Kroese, 3767
5 Portman Lane SE, Grand Rapids, MI 49508 (209) 988-8931, Bryan Niemeier, Jagi Lamplighter,
6 14505 Four Chimney Dr., Centreville, VA 20120, (703) 267-1722, John C. Wright, 14505 Four
7 Chimney Dr., Centreville, VA 20120 (703) 786-4998, Penny Sansevieri,
8 Penny@Amarketingexpert.com, (866)713-2318; 10730 Escobar Drive, San Diego, CA, 92124.

9 (a)-(c) Expenses incurred in Mitigation of Damages: In addition, Del Arroz began purchasing
10 advertisements on Facebook to offset the injury to reputation resulting from SFSFC’s conduct.
11 Since August of 2018, Del Arroz has paid approximately \$2,300 for Facebook advertisements.
12 Del Arroz also paid \$300 for BookBub. Witnesses include: Jonathan Del Arroz.

13 (a) – (c) Lost Value of Marketing: Del Arroz hired a marketing firm – Penny Sansevieri -
14 for \$3,500 who advised Del Arroz that she had no ability to put his book “The Stars Entwined”
15 into any science fiction magazine or blog. Witnesses include: Jonathan Del Arroz, Penny
16 Sansevieri.

17 9.2 Yes. Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
18 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
19 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
20 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
21 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
22 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
23 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
24 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
25 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
26 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
27 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
28 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
Kevin Roche; Communications with Incident Response Team (attached); Communications with
Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
(attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del

1 Arroz Open Letter (attached); Facebook Billing; Sansevieri Communication; Book Sales Report.

2 Respondent objects that the documents are equally accessible to propounding party and include
3 videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos
4 found at this url -

5 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or

6 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen

7 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>

8 (attached.) See also Tomlinson letter (attached.)

9 12.1 (a)-(d) Jonathan Del Arroz, Kevin Roche, Lori Buschbaum, Lou Antonelli, Robert

10 Kroese, 3767 Portman Lane SE, Grand Rapids, MI 49508 (209) 988-8931, Bryan Niemeier, Jagi

11 Lamplighter, 14505 Four Chimney Dr., Centreville, VA 20120, (703) 267-1722, John C. Wright,

12 14505 Four Chimney Dr., Centreville, VA 20120 (703) 786-4998, Penny Sansevieri,

13 Penny@Amarketingexpert.com, (866)713-2318; 10730 Escobar Drive, San Diego, CA, 92124.

14 12.2 No.

15 12.3 No.

16 12.4 Yes. See <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the
17 videos found at this url -

18 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or

19 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen

20 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>

21 12.5 No.

22 12.6 No.

23 12.7 No.

24 13.1 No

25 13.2 No

26 14.1 Civil Code §§44, 45, 45a, 46, 51, 51.5.

27 14.2 Respondent does not know.

28 17.1

(a) Request for Admission No. 1

(b) Propounding Party failed to attach the purported "code of conduct on the requests served on
Respondent.

1 (c) Defendant's counsel; Plaintiff's counsel.

2 (d) Request for Admissions Set 1.

3 (a) Request for Admission No. 2

4 (b) Propounding Party failed to attach the purported "code of conduct on the requests served on
Respondent.

5 (c) Defendant's counsel; Plaintiff's counsel.

6 (d) Request for Admissions Set 1.

7 (a) Request for Admission No. 3

8 (b) Propounding Party failed to attach the purported "code of conduct on the requests served on
9 Respondent.

10 (c) Defendant's counsel; Plaintiff's counsel.

11 (d) Request for Admissions Set 1.

12 (a) Request for Admission No. 4

13 (b) Propounding Party failed to attach the purported "code of conduct on the requests served on
Respondent.

14 (c) Defendant's counsel; Plaintiff's counsel.

15 (d) Request for Admissions Set 1.

16 (a) Request for Admission No. 5

17 (b) Respondent objects to this interrogatory on the grounds that the terms "annoyed, aggravated
18 and unsafe" are vague and ambiguous, particularly in light of the context of the prior definition
19 which includes threats and unjustified behavior. Respondent has no knowledge if other people
20 were annoyed, aggravated or made to feel unsafe by any behavior he engaged, particularly when
21 the terms "annoyed, aggravated and unsafe" are used in the context of threats and unjustified
22 behavior or used in a context where people who engaged in behavior that could broadly be
23 characterized as "annoying" or "aggravating" were not expelled from WorldCon76.

24 (c) Jonathan Del Arroz.

25 (d) Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration in
26 Opposition to SLAPP Motion ("Del Arroz Declaration."); Email Communication between Del
27 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
28 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori

1 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
2 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
3 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
4 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
5 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
6 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
7 Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
8 Kevin Roche; Communications with Incident Response Team (attached); Communications with
9 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
10 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
11 Arroz Open Letter (attached). Respondent objects that the documents are equally accessible to
12 propounding party and include videos at

13 <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at
14 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
15 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
16 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
17 (attached.) See also Tomlinson letter (attached.)

18 (a) Request for Admission No. 6

19 (b) Respondent was aware that Worldcon76 discriminated against Trump supporters and
20 conservatives.

21 (c) Jonathan Del Arroz.

22 (d) Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration in
23 Opposition to SLAPP Motion ("Del Arroz Declaration."); Email Communication between Del
24 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
25 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
26 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
27 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
28 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis

1 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
2 Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
3 Kevin Roche; Communications with Incident Response Team (attached); Communications with
4 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
5 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
6 Arroz Open Letter (attached). Respondent objects that the documents are equally accessible to
7 propounding party and include videos at

8 <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at
9 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
10 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
11 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
(attached.) See also Tomlinson letter (attached.)

12 (a) Request for Admission No. 7.

13 (b) Propounding Party failed to attach the purported "code of conduct on the requests served on
14 Respondent.

15 (c) Defendant's counsel; Plaintiff's counsel.

16 (d) Request for Admissions Set 1.

17 (a) Request for Admission No. 8.

18 (b) Propounding Party failed to attach the purported "code of conduct on the requests served on
19 Respondent.

20 (c) Defendant's counsel; Plaintiff's counsel.

21 (d) Request for Admissions Set 1.

22 (a) Request for Admission No. 9.

23 (b) Propounding Party failed to attach the purported "code of conduct on the requests served on
24 Respondent. In addition, people taped others at WorldCon76 where they could not have gotten
25 consent.

26 (c) Defendant's counsel; Plaintiff's counsel; Jonathan Del Arroz.

27 (d) Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration in
28 Opposition to SLAPP Motion ("Del Arroz Declaration."); Email Communication between Del
Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email

1 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
2 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
3 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
4 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
5 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
6 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
7 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
8 Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
9 Kevin Roche; Communications with Incident Response Team (attached); Communications with
10 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
11 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
12 Arroz Open Letter (attached). Respondent objects that the documents are equally accessible to
13 propounding party and include videos at

14 <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at
15 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
16 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
17 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
18 (attached.) See also Tomlinson letter (attached.)

19 (a) Request for Admission No. 10.

20 (b) Propounding party intended to videotape where videotaping was permitted and would have
21 desisted from taping where he was told not to videotape.

22 (c) Jonathan Del Arroz.

23 (d) Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration in
24 Opposition to SLAPP Motion ("Del Arroz Declaration."); Email Communication between Del
25 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
26 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
27 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
28 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del

1 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
2 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
3 Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
4 Kevin Roche; Communications with Incident Response Team (attached); Communications with
5 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
6 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
7 Arroz Open Letter (attached); Facebook Billing; Sansevieri Communication; Book Sales.
8 Respondent objects that the documents are equally accessible to propounding party and include
9 videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos
10 found at this url -
11 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
12 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
13 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
14 (attached.) See also Tomlinson letter (attached.)

15 Dated: September 20, 2019

Peter Sean Bradley, Esq.

17 By: Peter Sean Bradley
18 Peter Sean Bradley
19 Attorney for Plaintiff
20
21
22
23
24
25
26
27
28

VERIFICATION

I, Jonathan Del Arroz, am the plaintiff in in the above-entitled action. I have read the foregoing responses contained in the Responses to Form Interrogatory, Set Number 1, which are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

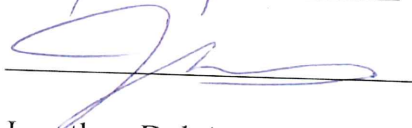
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this verification was executed in

Pleasanton, CA.

Dated:

9/20/19

Signed:



Name:

Jonathan Del Arroz

1 **PROOF OF SERVICE**

2 I am a resident of the State of California, over the age of eighteen years, and
3 not a party to the within action. My business address is 7045 N. Fruit Avenue, Fresno,
4 California. On September 20, 2019, I served the within documents:

5 ***PLAINTIFF'S RESPONSES TO DEFENDANT'S***
6 ***FORM INTERROGATORIES, SET NO. 1***

7 ☐

8 **BY FAX:** by transmitting via facsimile the document(s) listed above to the
9 fax number(s) set forth below on this date before 5:00 p.m.

10 ☐

11 **BY HAND:** by personally delivering the document(s) listed above to the
12 person(s) at the address(es) set forth below.

13 ☒

14 **BY MAIL:** by placing the sealed envelope for collection and processing
15 for mailing, following this business's usual practices, with which I am
16 readily familiar. On the same day correspondence is placed for collection
17 and mailing, it is deposited in the ordinary course of business with the
18 United States Postal Service.

19 ☐

20 **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an
21 overnight delivery service company for delivery to the addressee(s) on the
22 next business day.

23 ☐

24 **BY PERSONAL DELIVERY:** by causing personal delivery by
25 _____ of the document(s) listed above to the person(s) at the
26 address(es) set forth below.

27 Ann A. P. Nguyen
28 Lindsey V. Pho
MESSNER REEVES LLP
160 W. Santa Clara Street, Suite 1000
San Jose, CA 95113
Facsimile: (408) 298-0477

29 I am readily familiar with the firm's practice of collection and processing
30 correspondence for mailing. Under that practice it would be deposited with the U.S. Postal
31 Service on that same day with postage thereon fully prepaid in the ordinary course of
32 business. I am aware that on motion of the party served, service is presumed invalid if
33 postal cancellation date or postage meter date is more than one day after date of deposit for
34 mailing in affidavit.

35 I declare under penalty of perjury under the laws of the State of California
36 that the above is true and correct. Executed on September 20, 2019, at Fresno, California.

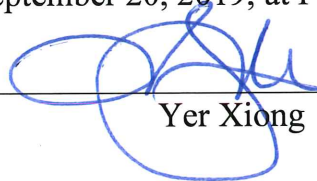
37 
38 Yer Xiong

EXHIBIT "D"

1 Peter Sean Bradley, Esq. SBN 109258
2 7045 North Fruit Avenue
3 Fresno, California 93711
Telephone No.: (559) 431-3142
Facsimile No.: (559) 436-1135

4 Attorney for Plaintiff,
Jonathan Del Arroz

5
6
7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF SANTA CLARA**
9

10 JONATHAN DEL ARROZ,

11 Plaintiff,

12 v.

13 SAN FRANCISCO SCIENCE FICTION
14 CONVENTIONS, INC. ("SFSFC") aka
15 "WORLDCON76" et al.,

16 Defendant.

) Case No.: 18-CV-33547
)
)
)

) **RESPONSES TO SPECIALLY**
) **PREPARED INTERROGATORIES, SET**
) **NO. 1**
)
)
)

17 PROPOUNDING PARTY : Defendant SAN FRANCISCO SCIENCE FICTION
CONVENTIONS, INC. ("SFSFC")

18 RESPONDING PARTY : Plaintiff JONATHAN DEL ARROZ

19 SET NUMBER : ONE
20
21

22 **General Objections:**

- 23 1. All Special Interrogatories have been given a reasonable construction.
24 2. It is a misuse of discovery to request information or documents which are privilege.
25 Accordingly, all Special Interrogatories have been construed as not requesting
26 privileged information and all Special Interrogatories are objected to insofar as they
27 could be construed as making such a request.
28

- 1 3. The term "all facts" is construed as being reasonably limited to the "call of the
2 question." To the extent that any Special Interrogatory is not so limited, it is objected
3 to as being overbroad and unreasonably burdensome and oppressive.
- 4 4. Respondent objects to any request to produce a document produced, generated,
5 written or maintained by Propounding Party on the grounds that such document is
6 equally available to Propounding Party and requiring Respondent to produce such
7 document is unduly burdensome and harassment.
- 8 5. The term "support or relate," or any variation thereof, is construed as being
9 reasonably limited to the "call of the question." To the extent that any Special
10 Interrogatory is not so limited, it is objected to as being overbroad and unreasonably
11 burdensome and oppressive.

12 **Special Interrogatory No. 1:**

13 State all facts that support or are related to the statement that Defendant's purported
14 policy was selectively engineered to apply only to [you] in order to deny [you your] legal and
15 civil rights and to retaliate against [you] because of [your] political views," as alleged in
16 paragraph 16 of the Complaint.

17 **Response to Special Interrogatory No. 1:**

18 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
19 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
20 Facebook page:

21 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
22 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
23 supporting membership preserves his rights to participate in the Hugo Awards nomination and
24 voting process. He was informed of our decision via email. We have taken this step because he
25 has made it clear that he fully intends to break our code of conduct. We take that seriously.
26 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
27 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
28 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
about the decision and it is final."

1 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
2 had threatened him with removal if he visited any hotel or other public space associated with the
3 convention.

4 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
5 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
6 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

7 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
8 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
9 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
10 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
11 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
12 known this because Del Arroz had told them.

13 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
14 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
15 behavior was or what part of the code of conduct was violated. This came after a discussion that
16 Del Arroz "harassed" individuals, presumably on the internet, but there was no evidence of such
17 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
18 that this harassment was anything other than a private dispute.

19 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
20 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
21 communication from SFSFC telling him that he would not be permitted to attend the convention
22 because he had allegedly made it clear on his personal blog that he was "planning on
23 engendering a hostile environment."

24 After this private communication, SFSFC then announced on Facebook that Del Arroz
25 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
26 had taken this step because "he had made it clear that he fully intends to break our code of
27 conduct, which SFSFC took seriously because "racist and bullying behavior is not acceptable at
28 our Worldcon," and that the "expulsion is one step toward eliminating such behavior." In short,
SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
he intended to break SFSFC's code of conduct by engaging in racist and bullying behavior.

1 SFSFC's statement was false. Del Arroz is not a racist or a bully. This accusation was
2 made because he had identified himself as a supporter of the Presidential Campaign of Donald
3 Trump. Since coming out as a Trump supporter, Del Arroz has been "doxed," i.e., his private
4 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
5 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
6 Arroz or other Trump supporters when they were threatened and hatred was expressed against
7 them.

8 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
9 from false claims that he had harassed other people. No one told him that his plan to wear a body
10 camera to document that he was not a harasser, or that he was the victim of harassment, would
11 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
12 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
13 engaged in free speech as contemplated by the First Amendment.

14 **Special Interrogatory No. 2:**

15 Identify all Documents that relate to Your response in the immediately preceding
16 interrogatory.

17 **Response to Special Interrogatory No. 2:**

18 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
19 in Opposition to SLAPP Motion ("Del Arroz Declaration."); Email Communication between Del
20 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
21 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
22 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
23 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
24 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
25 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
26 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
27 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
28 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
Kevin Roche; Communications with Incident Response Team (attached); Communications with

Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts (attached); WorldCon76 posts and comments (attached); Del Arroz Open Letter (attached).

Special Interrogatory No. 3:

Identify all persons with knowledge of facts related to Your response in Special Interrogatory No. 1.

Response to Special Interrogatory No. 3:

Jon Del Arroz, Lori Buschbaum, Kevin Roche.

Special Interrogatory No. 4:

State all facts that support or are related to the allegation in Paragraph 22 of the Complaint, that the Statement was false.

Response to Special Interrogatory No. 4:

In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its Facebook page:

"Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's supporting membership preserves his rights to participate in the Hugo Awards nomination and voting process. He was informed of our decision via email. We have taken this step because he has made it clear that he fully intends to break our code of conduct. We take that seriously. Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward eliminating such behavior and was not taken lightly. The senior staff and board are in agreement about the decision and it is final."

This announcement came after SFSFC had told Del Arroz of its decision to ban him and had threatened him with removal if he visited any hotel or other public space associated with the convention.

Del Arroz had previously told Kevin Roche that he was concerned about threats to his own security because of his conservatism. When Del Arroz mentioned "hijinks" he was describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he

1 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
2 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
3 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
4 known this because Del Arroz had told them.

5 SFSFC also stated that “that Plaintiff would not be permitted to attend WorldCon76 due
6 to his behavior, which violated WorldCon 76’s code of conduct” without specifying what that
7 behavior was or what part of the code of conduct was violated. This came after a discussion that
8 Del Arroz “harassed” individuals, presumably on the internet, but there was no evidence of such
9 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
10 that this harassment was anything other than a private dispute.

11 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
12 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
13 communication from SFSFC telling him that he would not be permitted to attend the convention
14 because he had allegedly made it clear on his personal blog that he was “planning on
15 engendering a hostile environment.”

16 After this private communication, SFSFC then announced on Facebook that Del Arroz
17 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
18 had taken this step because “he had made it clear that he fully intends to break our code of
19 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
20 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
21 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
22 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

23 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
24 made because he had identified himself as a supporter of the Presidential Campaign of Donald
25 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
26 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
27 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
28 Arroz or other Trump supporters when they were threatened and hatred was expressed against
them.

Del Arroz did not intend to violate any code of conduct. He intended to protect himself
from false claims that he had harassed other people. No one told him that his plan to wear a body

1 camera to document that he was not a harasser, or that he was the victim of harassment, would
2 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
3 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
4 engaged in free speech as contemplated by the First Amendment.

5 **Special Interrogatory No. 5:**

6 Identify all Documents that relate to Your response in the immediately preceding
7 interrogatory.

8 **Response to Special Interrogatory No. 5:**

9 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
10 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
11 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
12 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
13 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
14 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
15 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
16 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
17 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
18 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
19 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
20 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
21 Kevin Roche; Communications with Incident Response Team (attached); Communications with
22 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
(attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
Arroz Open Letter (attached).

23 **Special Interrogatory No. 6:**

24 Identify all persons with knowledge Interrogatory No. 4.

25 **Response to Special Interrogatory No. 6:**

26 Jon Del Arroz, Lori Buschbaum, Kevin Roche.

27 **Special Interrogatory No. 7:**

28 State all facts that support or are related to the allegation in Paragraph 22 of the
Complaint, that you were “unaware of any such code of conduct.”

1 **Response to Special Interrogatory No. 7:**

2 Respondent has no knowledge that any written policy makes recording at WorldCon76 a
3 violation of any code of conduct or standard of behavior. To the contrary, recordings are
4 generally allowed or encouraged at other science fiction conventions and they were allowed in
5 practice at WorldCon76.

6 **Special Interrogatory No. 8:**

7 Identify all Documents that relate to Your response in the immediately preceding
8 interrogatory.

9 **Response to Special Interrogatory No. 8:**

10 Respondent objects that the documents are equally accessible to propounding party and
11 include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the
12 videos found at this url -

13 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
14 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen

15 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
16 (attached.) See also Tomlinson letter (attached.)

17 **Special Interrogatory No. 9:**

18 Identify all persons with knowledge of facts related to Your response in Special
19 Interrogatory No. 7.

20 **Response to Special Interrogatory No. 9:**

21 Jon Del Arroz, Lori Buschbaum, Kevin Roche.

22 **Special Interrogatory No. 10:**

23 State all facts that support or are related to the allegation in Paragraph 22 of the
24 Complaint, that Your conduct at WorldCon 76 "would not have violated such a code of
25 conduct."

26 **Response to Special Interrogatory No. 10:**

27 Respondent would have recorded when and where permitted and would have desisted
28 from recording when requested by a representative of Propounding Party.

29 **Special Interrogatory No. 11:**

30 Identify all Documents that relate to Your response in the immediately preceding
31 interrogatory.

Response to Special Interrogatory No. 11:

Email Communications from WorldCon76 attached as Exhibit A to Del Arroz Declaration in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by Kevin Roche; Communications with Incident Response Team (attached); Communications with Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del Arroz Open Letter (attached). Respondent objects that the documents are equally accessible to propounding party and include videos at <https://www.youtube.com/channel/UCCuFuNUVh9lh93iwDmkPEcQ> and the videos found at this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3> (attached.) See also Tomlinson letter (attached.)

Special Interrogatory No. 12:

Identify all persons that with knowledge of the facts related to Your response in Special Interrogatory No. 10.

Response to Special Interrogatory No. 12:

Jonathan Del Arroz, Lori Buschbaum, Kevin Roche.

1 **Special Interrogatory No. 13:**

2 State all facts that support or are related to the allegation in Paragraph 22 of the
3 Complaint, "the statement that Del Arroz is a racist bully is false and SFSFC and its
4 representatives knew or should have known that the statement was false."

5 **Response to Special Interrogatory No. 13:**

6 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
7 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
8 Facebook page:

9 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
10 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
11 supporting membership preserves his rights to participate in the Hugo Awards nomination and
12 voting process. He was informed of our decision via email. We have taken this step because he
13 has made it clear that he fully intends to break our code of conduct. We take that seriously.
14 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
15 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
16 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
17 about the decision and it is final."

18 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
19 had threatened him with removal if he visited any hotel or other public space associated with the
20 convention.

21 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
22 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
23 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

24 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
25 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
26 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
27 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
28 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
known this because Del Arroz had told them.

SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
to his behavior, which violated WorldCon 76's code of conduct" without specifying what that

1 behavior was or what part of the code of conduct was violated. This came after a discussion that
2 Del Arroz “harassed” individuals, presumably on the internet, but there was no evidence of such
3 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
4 that this harassment was anything other than a private dispute.

5 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
6 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
7 communication from SFSFC telling him that he would not be permitted to attend the convention
8 because he had allegedly made it clear on his personal blog that he was “planning on
9 engendering a hostile environment.”

10 After this private communication, SFSFC then announced on Facebook that Del Arroz
11 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
12 had taken this step because “he had made it clear that he fully intends to break our code of
13 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
14 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
15 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
16 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

17 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
18 made because he had identified himself as a supporter of the Presidential Campaign of Donald
19 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
20 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
21 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
22 Arroz or other Trump supporters when they were threatened and hatred was expressed against
23 them.

24 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
25 from false claims that he had harassed other people. No one told him that his plan to wear a body
26 camera to document that he was not a harasser, or that he was the victim of harassment, would
27 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
28 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
engaged in free speech as contemplated by the First Amendment.

Special Interrogatory No. 14:

Identify all Documents that relate to Your response in the immediately preceding

1 interrogatory.

2 **Response to Special Interrogatory No. 14:**

3 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
4 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
5 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
6 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
7 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
8 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
9 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
10 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
11 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
12 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
13 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
14 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
15 Kevin Roche; Communications with Incident Response Team (attached); Communications with
16 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
17 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
18 Arroz Open Letter (attached). Respondent objects that the documents are equally accessible to
19 propounding party and include videos at
20 <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at
21 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
22 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
23 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
24 (attached.) See also Tomlinson letter (attached.)

25 **Special Interrogatory No. 15:**

26 Identify all persons with knowledge Interrogatory No. 15.

27 **Response to Special Interrogatory No. 15:**

28 Respondent is unable to answer this interrogatory as it makes no sense. Without waiving
this objection and reasonably construing this interrogatory as meaning to apply to Interrogatory
No. 13, Respondent identifies Jonathan Del Arroz, Lori Buschbaum and Kevin Roche.

1 **Special Interrogatory No. 16:**

2 State all facts that support or are related to the allegation in Paragraph 22 of the
3 Complaint, "the statement published by SFSFC and its representative with knowledge of its
4 falsity in order to maliciously injure Mr. Del Arroz's reputation and to retaliate against him
5 based on his political affiliations."

5 **Response to Special Interrogatory No. 16:**

6 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
7 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
8 Facebook page:

9 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
10 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
11 supporting membership preserves his rights to participate in the Hugo Awards nomination and
12 voting process. He was informed of our decision via email. We have taken this step because he
13 has made it clear that he fully intends to break our code of conduct. We take that seriously.
14 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
15 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
16 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
17 about the decision and it is final."

17 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
18 had threatened him with removal if he visited any hotel or other public space associated with the
19 convention.

20 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
21 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
22 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

23 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
24 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
25 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
26 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
27 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
28 known this because Del Arroz had told them.

1 SFSFC also stated that “that Plaintiff would not be permitted to attend WorldCon76 due
2 to his behavior, which violated WorldCon 76’s code of conduct” without specifying what that
3 behavior was or what part of the code of conduct was violated. This came after a discussion that
4 Del Arroz “harassed” individuals, presumably on the internet, but there was no evidence of such
5 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
6 that this harassment was anything other than a private dispute.

7 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
8 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
9 communication from SFSFC telling him that he would not be permitted to attend the convention
10 because he had allegedly made it clear on his personal blog that he was “planning on
11 engendering a hostile environment.”

12 After this private communication, SFSFC then announced on Facebook that Del Arroz
13 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
14 had taken this step because “he had made it clear that he fully intends to break our code of
15 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
16 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
17 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
18 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

19 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
20 made because he had identified himself as a supporter of the Presidential Campaign of Donald
21 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
22 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
23 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
24 Arroz or other Trump supporters when they were threatened and hatred was expressed against
25 them.

26 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
27 from false claims that he had harassed other people. No one told him that his plan to wear a body
28 camera to document that he was not a harasser, or that he was the victim of harassment, would
29 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
30 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
31 engaged in free speech as contemplated by the First Amendment.

1 **Special Interrogatory No. 17:**

2 Identify all Documents that relate to Your response in the immediately preceding
3 interrogatory.

4 **Response to Special Interrogatory No. 17:**

5 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
6 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
7 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
8 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
9 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
10 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
11 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
12 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
13 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
14 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
15 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
16 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
17 Kevin Roche; Communications with Incident Response Team (attached); Communications with
18 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
19 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
20 Arroz Open Letter (attached). Respondent objects that the documents are equally accessible to
21 propounding party and include videos at
22 <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at
23 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
24 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
25 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
26 (attached.) See also Tomlinson letter (attached.)

27 **Special Interrogatory No. 18:**

28 Identify all persons with knowledge Interrogatory No. 16.

Response to Special Interrogatory No. 18:

Jonathan Del Arroz, Lori Buschbaum and Kevin Roche.

1 **Special Interrogatory No. 19:**

2 State all facts that support or are related to the allegation in Paragraph 23 of the
3 Complaint, that “[Your] banning from WorldCon76 by SFSFC is due to [Your] publicly
4 outspoken status as a Republican, a Trump supporter and a believer in small government.”

5 **Response to Special Interrogatory No. 19:**

6 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
7 San Francisco Science Fiction Conventions, Inc. (“SFSFC”) posted the following on its
8 Facebook page:

9 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
10 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
11 supporting membership preserves his rights to participate in the Hugo Awards nomination and
12 voting process. He was informed of our decision via email. We have taken this step because he
13 has made it clear that he fully intends to break our code of conduct. We take that seriously.
14 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
15 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
16 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
17 about the decision and it is final."

18 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
19 had threatened him with removal if he visited any hotel or other public space associated with the
20 convention.

21 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
22 own security because of his conservatism. When Del Arroz mentioned “hijinks” he was
23 describing “hijinks” directed at Del Arroz, not perpetrated by Del Arroz.

24 SFSFC did not investigate Del Arroz’s plans. It did not contact Del Arroz about his
25 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
26 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
27 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
28 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
known this because Del Arroz had told them.

SFSFC also stated that “that Plaintiff would not be permitted to attend WorldCon76 due
to his behavior, which violated WorldCon 76's code of conduct” without specifying what that

1 behavior was or what part of the code of conduct was violated. This came after a discussion that
2 Del Arroz “harassed” individuals, presumably on the internet, but there was no evidence of such
3 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
4 that this harassment was anything other than a private dispute.

5 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
6 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
7 communication from SFSFC telling him that he would not be permitted to attend the convention
8 because he had allegedly made it clear on his personal blog that he was “planning on
9 engendering a hostile environment.”

10 After this private communication, SFSFC then announced on Facebook that Del Arroz
11 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
12 had taken this step because “he had made it clear that he fully intends to break our code of
13 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
14 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
15 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
16 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

17 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
18 made because he had identified himself as a supporter of the Presidential Campaign of Donald
19 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
20 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
21 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
22 Arroz or other Trump supporters when they were threatened and hatred was expressed against
23 them.

24 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
25 from false claims that he had harassed other people. No one told him that his plan to wear a body
26 camera to document that he was not a harasser, or that he was the victim of harassment, would
27 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
28 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
engaged in free speech as contemplated by the First Amendment.

1 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
2 with the Bay Area science fiction community. This changed during the course of the 2016
3 presidential campaign.

4 **Special Interrogatory No. 20:**

5 Identify all Documents that relate to Your response in the immediately preceding
6 interrogatory.

7 **Response to Special Interrogatory No. 20:**

8 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
9 in Opposition to SLAPP Motion ("Del Arroz Declaration."); Email Communication between Del
10 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
11 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
12 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
13 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
14 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
15 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
16 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
17 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
18 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
19 Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
20 Kevin Roche; Communications with Incident Response Team (attached); Communications with
21 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
22 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
23 Arroz Open Letter (attached). Respondent objects that the documents are equally accessible to
24 propounding party and include videos at
25 <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at
26 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
27 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
28 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
(attached.) See also Tomlinson letter (attached.)

Special Interrogatory No. 21:

Identify all persons with knowledge Interrogatory No. 19.

1 **Response to Special Interrogatory No. 21:**

2 Jonathan Del Arroz, Lori Buschbaum and Kevin Roche.

3 **Special Interrogatory No. 22:**

4 State all facts that support or are related to the allegation in Paragraph 23 of the
5 Complaint, that after You identified Yourself as a Trump supporter online You “found
6 [Yourself] being condemned as racist by opponents of President Trump, including many of such
7 persons who are involved in WorldCon76.”

8 **Response to Special Interrogatory No. 22:**

9 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
10 San Francisco Science Fiction Conventions, Inc. (“SFSFC”) posted the following on its
11 Facebook page:

12 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
13 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
14 supporting membership preserves his rights to participate in the Hugo Awards nomination and
15 voting process. He was informed of our decision via email. We have taken this step because he
16 has made it clear that he fully intends to break our code of conduct. We take that seriously.
17 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
18 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
19 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
20 about the decision and it is final."

21 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
22 had threatened him with removal if he visited any hotel or other public space associated with the
23 convention.

24 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
25 own security because of his conservatism. When Del Arroz mentioned “hijinks” he was
26 describing “hijinks” directed at Del Arroz, not perpetrated by Del Arroz.

27 SFSFC did not investigate Del Arroz’s plans. It did not contact Del Arroz about his
28 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz

1 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
2 known this because Del Arroz had told them.

3 SFSFC also stated that “that Plaintiff would not be permitted to attend WorldCon76 due
4 to his behavior, which violated WorldCon 76’s code of conduct” without specifying what that
5 behavior was or what part of the code of conduct was violated. This came after a discussion that
6 Del Arroz “harassed” individuals, presumably on the internet, but there was no evidence of such
7 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
8 that this harassment was anything other than a private dispute.

9 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
10 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
11 communication from SFSFC telling him that he would not be permitted to attend the convention
12 because he had allegedly made it clear on his personal blog that he was “planning on
13 engendering a hostile environment.”

14 After this private communication, SFSFC then announced on Facebook that Del Arroz
15 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
16 had taken this step because “he had made it clear that he fully intends to break our code of
17 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
18 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
19 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
20 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

21 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
22 made because he had identified himself as a supporter of the Presidential Campaign of Donald
23 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
24 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
25 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
26 Arroz or other Trump supporters when they were threatened and hatred was expressed against
27 them.

28 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
from false claims that he had harassed other people. No one told him that his plan to wear a body
camera to document that he was not a harasser, or that he was the victim of harassment, would
violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not

1 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
2 engaged in free speech as contemplated by the First Amendment.

3 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
4 with the Bay Area science fiction community. This changed during the course of the 2016
5 presidential campaign.

6 **Special Interrogatory No. 23:**

7 Identify all Documents that relate to Your response in the immediately preceding
8 interrogatory.

9 **Response to Special Interrogatory No. 23:**

10 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
11 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
12 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
13 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
14 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
15 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
16 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
17 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
18 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
19 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
20 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
21 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
22 Kevin Roche; Communications with Incident Response Team (attached); Communications with
23 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
24 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
25 Arroz Open Letter (attached) ; Book Sales; Facebook costs; communications with Penny
26 Sansevieri. Respondent objects that the documents are equally accessible to propounding party
27 and include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and
28 the videos found at this url -

<https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
<https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen

1 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>

2 (attached.) See also Tomlinson letter (attached.)

3 **Special Interrogatory No. 24:**

4 Identify all persons with knowledge Interrogatory No. 22

5 **Response to Special Interrogatory No. 24:**

6 Jonathan Del Arroz, Lori Buschbaum and Kevin Roche.

7 **Special Interrogatory No. 25:**

8 State all facts that support or are related to the allegation that Responding Party “has been
9 financially damaged with respect to lost sales he would have made at WorldCon76 and to lost
10 book sales arising from the injury to his reputation as an author as a result of the banning, as
11 alleged in Paragraph 68 of the Complaint.

12 **Response to Special Interrogatory No. 25:**

13 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
14 San Francisco Science Fiction Conventions, Inc. (“SFSFC”) posted the following on its
15 Facebook page:

16 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
17 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
18 supporting membership preserves his rights to participate in the Hugo Awards nomination and
19 voting process. He was informed of our decision via email. We have taken this step because he
20 has made it clear that he fully intends to break our code of conduct. We take that seriously.
21 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
22 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
23 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
24 about the decision and it is final."

25 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
26 had threatened him with removal if he visited any hotel or other public space associated with the
27 convention.

28 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
own security because of his conservatism. When Del Arroz mentioned “hijinks” he was
describing “hijinks” directed at Del Arroz, not perpetrated by Del Arroz.

1 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
2 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
3 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
4 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
5 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
6 known this because Del Arroz had told them.

7 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
8 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
9 behavior was or what part of the code of conduct was violated. This came after a discussion that
10 Del Arroz "harassed" individuals, presumably on the internet, but there was no evidence of such
11 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
12 that this harassment was anything other than a private dispute.

13 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
14 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
15 communication from SFSFC telling him that he would not be permitted to attend the convention
16 because he had allegedly made it clear on his personal blog that he was "planning on
17 engendering a hostile environment."

18 After this private communication, SFSFC then announced on Facebook that Del Arroz
19 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
20 had taken this step because "he had made it clear that he fully intends to break our code of
21 conduct, which SFSFC took seriously because "racist and bullying behavior is not acceptable at
22 our Worldcon," and that the "expulsion is one step toward eliminating such behavior." In short,
23 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
24 he intended to break SFSFC's code of conduct by engaging in racist and bullying behavior.

25 SFSFC's statement was false. Del Arroz is not a racist or a bully. This accusation was
26 made because he had identified himself as a supporter of the Presidential Campaign of Donald
27 Trump. Since coming out as a Trump supporter, Del Arroz has been "doxed," i.e., his private
28 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
Arroz or other Trump supporters when they were threatened and hatred was expressed against
them.

1 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
2 from false claims that he had harassed other people. No one told him that his plan to wear a body
3 camera to document that he was not a harasser, or that he was the victim of harassment, would
4 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
5 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
engaged in free speech as contemplated by the First Amendment.

6 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
7 with the Bay Area science fiction community. This changed during the course of the 2016
8 presidential campaign.

9 Del Arroz intended to sell his books at WorldCon 76. Based on his prior experience in
10 selling books at other conventions, he expected to sell approximately 60 to 100 books for a profit
11 of \$1,200 to \$2,000. He was prevented from making such sales by defendant. In addition, the
12 slander tainted him as racist which resulted in reviewers refusing to review and other interference
13 with his sales of his books. For example, Del Arroz hired a marketing firm – Penny Sansevieri -
14 for \$3,500 who advised Del Arroz that she had no ability to put his book “The Stars Entwined”
15 into any science fiction magazine or blog. At the time of WorldCon76 Del Arroz launched a
16 book called “The Stars Entwined” which had sales 1/6th of his prior sales of his book “For Steam
17 and Country.” The lost sales represented lost sales of approximately one thousand books or lost
profits of approximately \$5,000. Other book sales of Del Arroz’s books were also affected.

18 **Special Interrogatory No. 26:**

19 Identify all Documents that relate to Your response in the immediately preceding
20 interrogatory.

21 **Response to Special Interrogatory No. 26:**

22 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
23 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
24 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
25 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
26 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
27 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
28 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as

1 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
2 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
3 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
4 Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
5 Kevin Roche; Communications with Incident Response Team (attached); Communications with
6 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
7 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
8 Arroz Open Letter (attached); ; Book Sales; Facebook costs; communications with Penny
9 Sansevieri. Respondent objects that the documents are equally accessible to propounding party
10 and include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and
11 the videos found at this url -
12 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
13 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
14 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
(attached.) See also Tomlinson letter (attached.)

15 **Special Interrogatory No. 27:**

16 Identify all persons with knowledge Interrogatory No. 22

17 **Response to Special Interrogatory No. 27:**

18 Jonathan Del Arroz, Penny Sansevieri, Penny@Amarketingexpert.com, (866)713-2318;
19 10730 Escobar Drive, San Diego, CA, 92124; Lori Buschbaum and Kevin Roche.

20 **Special Interrogatory No. 28:**

21 State all facts that support or are related to the allegation that Responding Party " has
22 suffered distress, including embarrassment, humiliation, anguish, stress and depression as a
23 result of Defendants' unlawful and unfair treatment," as alleged in Paragraph 68 of the
Complaint.

24 **Response to Special Interrogatory No. 28:**

25 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
26 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
Facebook page:

27 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
28 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's

1 supporting membership preserves his rights to participate in the Hugo Awards nomination and
2 voting process. He was informed of our decision via email. We have taken this step because he
3 has made it clear that he fully intends to break our code of conduct. We take that seriously.
4 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
5 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
6 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
7 about the decision and it is final."

8 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
9 had threatened him with removal if he visited any hotel or other public space associated with the
10 convention.

11 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
12 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
13 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

14 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
15 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
16 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
17 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
18 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
19 known this because Del Arroz had told them.

20 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
21 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
22 behavior was or what part of the code of conduct was violated. This came after a discussion that
23 Del Arroz "harassed" individuals, presumably on the internet, but there was no evidence of such
24 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
25 that this harassment was anything other than a private dispute.

26 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
27 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
28 communication from SFSFC telling him that he would not be permitted to attend the convention
because he had allegedly made it clear on his personal blog that he was "planning on
engendering a hostile environment."

1 After this private communication, SFSFC then announced on Facebook that Del Arroz
2 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
3 had taken this step because “he had made it clear that he fully intends to break our code of
4 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
5 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
6 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
7 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

8 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
9 made because he had identified himself as a supporter of the Presidential Campaign of Donald
10 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
11 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
12 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
13 Arroz or other Trump supporters when they were threatened and hatred was expressed against
14 them.

15 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
16 from false claims that he had harassed other people. No one told him that his plan to wear a body
17 camera to document that he was not a harasser, or that he was the victim of harassment, would
18 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
19 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
20 engaged in free speech as contemplated by the First Amendment.

21 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
22 with the Bay Area science fiction community. This changed during the course of the 2016
23 presidential campaign. Further, Del Arroz was prevented from selling books at WorldCon76 and
24 associating with fellow authors and fans.

25 **Special Interrogatory No. 29:**

26 Identify all Documents that relate to Your response in the immediately preceding
27 interrogatory.

28 **Response to Special Interrogatory No. 29:**

Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication

1 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
2 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
3 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
4 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
5 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
6 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
7 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
8 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
9 Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
10 Kevin Roche; Communications with Incident Response Team (attached); Communications with
11 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
12 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
13 Arroz Open Letter (attached). Respondent objects that the documents are equally accessible to
14 propounding party and include videos at
15 <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at
16 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
17 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
18 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
19 (attached.) See also Tomlinson letter (attached.)

20 **Special Interrogatory No. 30:**

21 Identify all persons with knowledge Interrogatory No. 28

22 **Response to Special Interrogatory No. 30:**

23 Jonathan Del Arroz, Lori Buschbaum and Kevin Roche.

24 **Special Interrogatory No. 31:**

25 State all facts that support or are related to the allegation that Propounding Party's
26 conduct was "fraudulent, oppressive and malicious in that said Defendants were aware that they
27 were threatening Mr. Del Arroz with physical violence in order to prevent him from exercising
28 his rights important civil rights...." as alleged in Paragraph 69 of the Complaint.

1 **Response to Special Interrogatory No. 31:**

2 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
3 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
4 Facebook page:

5 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
6 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
7 supporting membership preserves his rights to participate in the Hugo Awards nomination and
8 voting process. He was informed of our decision via email. We have taken this step because he
9 has made it clear that he fully intends to break our code of conduct. We take that seriously.
10 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
11 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
12 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
13 about the decision and it is final."

14 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
15 had threatened him with removal if he visited any hotel or other public space associated with the
16 convention.

17 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
18 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
19 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

20 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
21 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
22 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
23 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
24 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
25 known this because Del Arroz had told them.

26 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
27 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
28 behavior was or what part of the code of conduct was violated. This came after a discussion that
Del Arroz "harassed" individuals, presumably on the internet, but there was no evidence of such
conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
that this harassment was anything other than a private dispute.

1 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
2 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
3 communication from SFSFC telling him that he would not be permitted to attend the convention
4 because he had allegedly made it clear on his personal blog that he was “planning on
engendering a hostile environment.”

5 After this private communication, SFSFC then announced on Facebook that Del Arroz
6 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
7 had taken this step because “he had made it clear that he fully intends to break our code of
8 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
9 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
10 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
11 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

12 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
13 made because he had identified himself as a supporter of the Presidential Campaign of Donald
14 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
15 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
16 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
17 Arroz or other Trump supporters when they were threatened and hatred was expressed against
them.

18 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
19 from false claims that he had harassed other people. No one told him that his plan to wear a body
20 camera to document that he was not a harasser, or that he was the victim of harassment, would
21 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
22 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
engaged in free speech as contemplated by the First Amendment.

23 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
24 with the Bay Area science fiction community. This changed during the course of the 2016
25 presidential campaign.

26 **Special Interrogatory No. 32:**

27 Identify all Documents that relate to Your response in the immediately preceding
28 interrogatory.

1 **Response to Special Interrogatory No. 32:**

2 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
3 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
4 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
5 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
6 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
7 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
8 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
9 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
10 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
11 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
12 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
13 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
14 Kevin Roche; Communications with Incident Response Team (attached); Communications with
15 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
16 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
17 Arroz Open Letter (attached). Respondent objects that the documents are equally accessible to
18 propounding party and include videos at
19 <https://www.youtube.com/channel/UCCuFuNUVh9lh93iwDmkPEcQ> and the videos found at
20 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
21 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
22 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
23 (attached.) See also Tomlinson letter (attached.)

24 **Special Interrogatory No. 33:**

25 Identify all persons with knowledge Interrogatory No. 31.

26 **Response to Special Interrogatory No. 33:**

27 Jonathan Del Arroz, Lori Buschbaum and Kevin Roche.

28 **Special Interrogatory No. 34:**

State all facts that support or are related to Your contention that The Statement injured
Your property, business, trade, profession or occupation.

1 **Response to Special Interrogatory No. 34:**

2 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
3 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
4 Facebook page:

5 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
6 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
7 supporting membership preserves his rights to participate in the Hugo Awards nomination and
8 voting process. He was informed of our decision via email. We have taken this step because he
9 has made it clear that he fully intends to break our code of conduct. We take that seriously.
10 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
11 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
12 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
13 about the decision and it is final."

14 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
15 had threatened him with removal if he visited any hotel or other public space associated with the
16 convention.

17 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
18 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
19 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

20 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
21 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
22 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
23 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
24 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
25 known this because Del Arroz had told them.

26 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
27 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
28 behavior was or what part of the code of conduct was violated. This came after a discussion that
Del Arroz "harassed" individuals, presumably on the internet, but there was no evidence of such
conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
that this harassment was anything other than a private dispute.

1 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
2 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
3 communication from SFSFC telling him that he would not be permitted to attend the convention
4 because he had allegedly made it clear on his personal blog that he was “planning on
engendering a hostile environment.”

5 After this private communication, SFSFC then announced on Facebook that Del Arroz
6 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
7 had taken this step because “he had made it clear that he fully intends to break our code of
8 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
9 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
10 SFSFC essentially told the general public and members of the science fiction community that
11 Del Arroz had been banned because he intended to break SFSFC’s code of conduct by engaging
12 in racist and bullying behavior.

13 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
14 made because he had identified himself as a supporter of the Presidential Campaign of Donald
15 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
16 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
17 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
18 Arroz or other Trump supporters when they were threatened and hatred was expressed against
them.

19 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
20 from false claims that he had harassed other people. No one told him that his plan to wear a body
21 camera to document that he was not a harasser, or that he was the victim of harassment, would
22 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
23 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
engaged in free speech as contemplated by the First Amendment.

24 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
25 with the Bay Area science fiction community. This changed during the course of the 2016
26 election campaign. Del Arroz hired a marketing firm – Penny Sansevieri - for \$3,500 who
27 advised Del Arroz that she had no ability to put his book “The Stars Entwined” into any science
28 fiction magazine or blog. At the time of WorldCon76 Del Arroz launched a book called “The

1 Stars Entwined” which had sales 1/6th of his prior sales of his book “For Steam and Country.”
2 The lost sales represented lost sales of approximately one thousand books or lost profits of
3 approximately \$5,000.

4 **Special Interrogatory No. 35:**

5 Identify all Documents that relate to Your response in the immediately preceding
6 interrogatory.

7 **Response to Special Interrogatory No. 35:**

8 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
9 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
10 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
11 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
12 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
13 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
14 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
15 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
16 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
17 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
18 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
19 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
20 Kevin Roche; Communications with Incident Response Team (attached); Communications with
21 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
22 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
23 Arroz Open Letter (attached) ; Book Sales; Facebook costs; communications with Penny
24 Sansevieri. Respondent objects that the documents are equally accessible to propounding party
25 and include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and
26 the videos found at this url -
27 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
28 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
(attached.) See also Tomlinson letter (attached.)

1 **Special Interrogatory No. 36:**

2 Identify all persons with knowledge Interrogatory No. 34.

3 **Response to Special Interrogatory No. 36:**

4 Jonathan Del Arroz, Lori Buschbaum, Kevin Roche, Lou Antonelli, Robert Kroese, 3767
5 Portman Lane SE, Grand Rapids, MI 49508 (209) 988-8931, Bryan Niemeier, Jagi Lamplighter,
6 14505 Four Chimney Dr., Centreville, VA 20120, (703) 267-1722, John C. Wright, 14505 Four
7 Chimney Dr. Centreville, VA 20120 (703) 786-4998; Penny Sansevieri,
8 Penny@Amarketingexpert.com, (866)713-2318; 10730 Escobar Drive, San Diego, CA, 92124

9 **Special Interrogatory No. 37:**

10 State all facts that support or are related to Your contention that The Statement exposed
11 you to hatred, contempt, ridicule or shame.

12 **Response to Special Interrogatory No. 37:**

13 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
14 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
15 Facebook page:

16 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
17 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
18 supporting membership preserves his rights to participate in the Hugo Awards nomination and
19 voting process. He was informed of our decision via email. We have taken this step because he
20 has made it clear that he fully intends to break our code of conduct. We take that seriously.
21 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
22 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
23 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
24 about the decision and it is final."

25 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
26 had threatened him with removal if he visited any hotel or other public space associated with the
27 convention.

28 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

1 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
2 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
3 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
4 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
5 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
6 known this because Del Arroz had told them.

7 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
8 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
9 behavior was or what part of the code of conduct was violated. This came after a discussion that
10 Del Arroz "harassed" individuals, presumably on the internet, but there was no evidence of such
11 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
12 that this harassment was anything other than a private dispute.

13 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
14 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
15 communication from SFSFC telling him that he would not be permitted to attend the convention
16 because he had allegedly made it clear on his personal blog that he was "planning on
17 engendering a hostile environment."

18 After this private communication, SFSFC then announced on Facebook that Del Arroz
19 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
20 had taken this step because "he had made it clear that he fully intends to break our code of
21 conduct, which SFSFC took seriously because "racist and bullying behavior is not acceptable at
22 our Worldcon," and that the "expulsion is one step toward eliminating such behavior." In short,
23 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
24 he intended to break SFSFC's code of conduct by engaging in racist and bullying behavior.

25 SFSFC's statement was false. Del Arroz is not a racist or a bully. This accusation was
26 made because he had identified himself as a supporter of the Presidential Campaign of Donald
27 Trump. Since coming out as a Trump supporter, Del Arroz has been "doxed," i.e., his private
28 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
Arroz or other Trump supporters when they were threatened and hatred was expressed against
them.

1 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
2 from false claims that he had harassed other people. No one told him that his plan to wear a body
3 camera to document that he was not a harasser, or that he was the victim of harassment, would
4 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
5 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
engaged in free speech as contemplated by the First Amendment.

6 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
7 with the Bay Area science fiction community. This changed during the course of the 2016
8 presidential campaign. Del Arroz hired a marketing firm – Penny Sansevieri - for \$3,500 who
9 advised Del Arroz that she had no ability to put his book “The Stars Entwined” into any science
10 fiction magazine or blog. At the time of WorldCon76 Del Arroz launched a book called “The
11 Stars Entwined” which had sales 1/6th of his prior sales of his book “For Steam and Country.”
12 The lost sales represented lost sales of approximately one thousand books or lost profits of
approximately \$5,000.

13 **Special Interrogatory No. 38:**

14 Identify all Documents that relate to Your response in the immediately preceding
15 interrogatory.

16 **Response to Special Interrogatory No. 38:**

17 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
18 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
19 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
20 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
21 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
22 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
23 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
24 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
25 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
26 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
27 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
28 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
Kevin Roche; Communications with Incident Response Team (attached); Communications with

Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del Arroz Open Letter (attached); Facebook Costs, Book Sales, Sansevieri Email. Respondent objects that the documents are equally accessible to propounding party and include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3> (attached.) See also Tomlinson letter (attached.)

Special Interrogatory No. 39:

Identify all persons with knowledge Interrogatory No. 37.

Response to Special Interrogatory No. 39:

Jonathan Del Arroz, Lori Buschbaum, Kevin Roche, Lou Antonelli, Robert Kroese, Bryan Niemeier, Jagi Lamplighter, John C. Wright, Penny Sansevieri, Penny@Amarketingexpert.com.

Special Interrogatory No. 40:

State all facts that support or are related to Your contention that the Statement discouraged others from associating or dealing with you.

Response to Special Interrogatory No. 40:

In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its Facebook page:

"Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's supporting membership preserves his rights to participate in the Hugo Awards nomination and voting process. He was informed of our decision via email. We have taken this step because he has made it clear that he fully intends to break our code of conduct. We take that seriously. Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward

1 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
2 about the decision and it is final."

3 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
4 had threatened him with removal if he visited any hotel or other public space associated with the
5 convention.

6 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
7 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
8 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

9 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
10 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
11 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
12 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
13 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
14 known this because Del Arroz had told them.

15 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
16 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
17 behavior was or what part of the code of conduct was violated. This came after a discussion that
18 Del Arroz "harassed" individuals, presumably on the internet, but there was no evidence of such
19 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
20 that this harassment was anything other than a private dispute.

21 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
22 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
23 communication from SFSFC telling him that he would not be permitted to attend the convention
24 because he had allegedly made it clear on his personal blog that he was "planning on
25 engendering a hostile environment."

26 After this private communication, SFSFC then announced on Facebook that Del Arroz
27 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
28 had taken this step because "he had made it clear that he fully intends to break our code of
conduct, which SFSFC took seriously because "racist and bullying behavior is not acceptable at
our Worldcon," and that the "expulsion is one step toward eliminating such behavior." In short,

1 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
2 he intended to break SFSFC's code of conduct by engaging in racist and bullying behavior.

3 SFSFC's statement was false. Del Arroz is not a racist or a bully. This accusation was
4 made because he had identified himself as a supporter of the Presidential Campaign of Donald
5 Trump. Since coming out as a Trump supporter, Del Arroz has been "doxed," i.e., his private
6 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
7 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
8 Arroz or other Trump supporters when they were threatened and hatred was expressed against
9 them.

10 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
11 from false claims that he had harassed other people. No one told him that his plan to wear a body
12 camera to document that he was not a harasser, or that he was the victim of harassment, would
13 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
14 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
15 engaged in free speech as contemplated by the First Amendment.

16 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
17 with the Bay Area science fiction community. This changed during the course of the 2016
18 presidential campaign. In addition, prior to coming out as a Trump supporter, Del Arroz had
19 good relationship with the Bay Area science fiction community. This changed during the course
20 of the 2016 presidential campaign. Del Arroz hired a marketing firm – Penny Sansevieri - for
21 \$3,500 who advised Del Arroz that she had no ability to put his book "The Stars Entwined" into
22 any science fiction magazine or blog. At the time of WorldCon76 Del Arroz launched a book
23 called "The Stars Entwined" which had sales 1/6th of his prior sales of his book "For Steam and
24 Country." The lost sales represented lost sales of approximately one thousand books or lost
25 profits of approximately \$5,000.

26 **Special Interrogatory No. 41:**

27 Identify all Documents that relate to Your response in the immediately preceding
28 interrogatory.

29 **Response to Special Interrogatory No. 41:**

30 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
31 in Opposition to SLAPP Motion ("Del Arroz Declaration."); Email Communication between Del

1 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
2 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
3 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
4 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
5 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
6 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
7 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
8 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
9 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
10 Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
11 Kevin Roche; Communications with Incident Response Team (attached); Communications with
12 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
13 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
14 Arroz Open Letter (attached) ; Book Sales; Facebook costs; communications with Penny
15 Sansevieri. Respondent objects that the documents are equally accessible to propounding party
16 and include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and
17 the videos found at this url -

18 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
19 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
20 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
21 (attached.) See also Tomlinson letter (attached.)

22 **Special Interrogatory No. 42:**

23 Identify all persons with knowledge Interrogatory No. 40.

24 **Response to Special Interrogatory No. 42:**

25 Jonathan Del Arroz, Lori Buschbaum, Kevin Roche, Lou Antonelli, Robert Kroese,
26 Bryan Niemeier, Jagi Lamplighter, John C. Wright, Penny Sansevieri.

27 **Special Interrogatory No. 43:**

28 If You contend that the readers of the Statement reasonably understood the Statement to
mean that You are a racist bully, state all facts related to your contention.

1 **Response to Special Interrogatory No. 43:**

2 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
3 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
4 Facebook page:

5 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
6 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
7 supporting membership preserves his rights to participate in the Hugo Awards nomination and
8 voting process. He was informed of our decision via email. We have taken this step because he
9 has made it clear that he fully intends to break our code of conduct. We take that seriously.
10 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
11 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
12 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
about the decision and it is final."

13 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
14 had threatened him with removal if he visited any hotel or other public space associated with the
convention.

15 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
16 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
17 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

18 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
19 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
20 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
21 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
22 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
known this because Del Arroz had told them.

23 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
24 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
25 behavior was or what part of the code of conduct was violated. This came after a discussion that
26 Del Arroz "harassed" individuals, presumably on the internet, but there was no evidence of such
27 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
28 that this harassment was anything other than a private dispute.

1 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
2 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
3 communication from SFSFC telling him that he would not be permitted to attend the convention
4 because he had allegedly made it clear on his personal blog that he was “planning on
engendering a hostile environment.”

5 After this private communication, SFSFC then announced on Facebook that Del Arroz
6 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
7 had taken this step because “he had made it clear that he fully intends to break our code of
8 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
9 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
10 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
11 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

12 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
13 made because he had identified himself as a supporter of the Presidential Campaign of Donald
14 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
15 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
16 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
17 Arroz or other Trump supporters when they were threatened and hatred was expressed against
them.

18 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
19 from false claims that he had harassed other people. No one told him that his plan to wear a body
20 camera to document that he was not a harasser, or that he was the victim of harassment, would
21 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
22 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
engaged in free speech as contemplated by the First Amendment.

23 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
24 with the Bay Area science fiction community. This changed during the course of the 2016
25 presidential campaign. Del Arroz hired a marketing firm – Penny Sansevieri - for \$3,500 who
26 advised Del Arroz that she had no ability to put his book “The Stars Entwined” into any science
27 fiction magazine or blog. At the time of WorldCon76 Del Arroz launched a book called “The
28 Stars Entwined” which had sales 1/6th of his prior sales of his book “For Steam and Country.”

1 The lost sales represented lost sales of approximately one thousand books or lost profits of
2 approximately \$5,000.

3 **Special Interrogatory No. 44:**

4 Identify all Documents that relate to Your response in the immediately preceding
5 interrogatory.

6 **Response to Special Interrogatory No. 44:**

7 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
8 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
9 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
10 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
11 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
12 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
13 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
14 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
15 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
16 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
17 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
18 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
19 Kevin Roche; Communications with Incident Response Team (attached); Communications with
20 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
21 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
22 Arroz Open Letter (attached) ; Book Sales; Facebook costs; communications with Penny
23 Sansevieri. Respondent objects that the documents are equally accessible to propounding party
24 and include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and
25 the videos found at this url -
26 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
27 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
28 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
(attached.) See also Tomlinson letter (attached.)

Special Interrogatory No. 45:

1 Identify all persons who you contend read the Statement and understood the Statement to
2 mean that You are a racist bully.

3 **Response to Special Interrogatory No. 45:**

4 Respondent contends that the reasonable reader of the Statement would naturally
5 conclude that SFSFC was accusing Respondent of being a racist bully. Respondent objects to
6 the present interrogatory insofar as it would require him to interview every person who read the
7 Statement, which would be unduly burdensome and oppressive, but those who understood the
8 Statement to mean that SFSFC was telling others that Respondent was a racist bully include:
9 Jonathan Del Arroz, Lou Antonelli, Robert Kroese, 3767 Portman Lane SE, Grand Rapids, MI
10 49508 (209) 988-8931, Bryan Niemeier, Jagi Lamplighter, 14505 Four Chimney Dr.
11 Centreville, VA 20120, (703) 267-1722, John C. Wright, 14505 Four Chimney Dr.
12 Centreville, VA 20120 (703) 786-4998, Penny Sansevieri.

13 **Special Interrogatory No. 46:**

14 State all facts that support or are related to Your contention that You did not intend to
15 break Propounding Party's code of conduct at WorldCon76.

16 **Response to Special Interrogatory No. 46:**

17 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
18 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
19 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

20 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
21 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
22 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
23 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
24 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
25 known this because Del Arroz had told them.

26 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
27 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
28 behavior was or what part of the code of conduct was violated. This came after a discussion that
Del Arroz "harassed" individuals, presumably on the internet, but there was no evidence of such
conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
that this harassment was anything other than a private dispute.

1 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
2 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
3 communication from SFSFC telling him that he would not be permitted to attend the convention
4 because he had allegedly made it clear on his personal blog that he was “planning on
engendering a hostile environment.”

5 After this private communication, SFSFC then announced on Facebook that Del Arroz
6 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
7 had taken this step because “he had made it clear that he fully intends to break our code of
8 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
9 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
10 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
11 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

12 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
13 made because he had identified himself as a supporter of the Presidential Campaign of Donald
14 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
15 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
16 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
17 Arroz or other Trump supporters when they were threatened and hatred was expressed against
them.

18 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
19 from false claims that he had harassed other people. No one told him that his plan to wear a body
20 camera to document that he was not a harasser, or that he was the victim of harassment, would
21 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
22 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
23 engaged in free speech as contemplated by the First Amendment. If SFSFC’s concern was that
24 Del Arroz would videotape like other persons attending WorldCon76 videotaped, then Del Arroz
25 would have desisted from videotaping at any time, place or manner upon a request from a
representative of SFSFC that he discontinue.

26 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
27 with the Bay Area science fiction community. He had never been accused of misbehaving at any
28 prior convention. In fact, he had assisted in such conventions.

1 **Special Interrogatory No. 47:**

2 Identify all Documents that relate to Your response in the immediately preceding
3 interrogatory.

4 **Response to Special Interrogatory No. 47:**

5 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
6 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
7 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
8 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
9 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
10 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
11 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
12 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
13 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
14 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
15 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
16 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
17 Kevin Roche; Communications with Incident Response Team (attached); Communications with
18 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
19 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
20 Arroz Open Letter (attached). In addition, Respondent objects that the documents are equally
21 accessible to propounding party and include videos at
22 <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at
23 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
24 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
25 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
26 (attached.) See also Tomlinson communication (attached.)

27 **Special Interrogatory No. 48:**

28 Identify all persons with knowledge Interrogatory No. 46.

Response to Special Interrogatory No. 48:

Jonathan Del Arroz, Lori Buschbaum and Kevin Roche.

1 **Special Interrogatory No. 49:**

2 Identify all documents that relate to Your contention that the Statement was substantial
3 factor in causing You harm.

4 **Response to Special Interrogatory No. 49:**

5 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
6 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
7 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
8 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
9 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
10 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
11 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
12 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
13 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
14 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
15 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
16 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
17 Kevin Roche; Communications with Incident Response Team (attached); Communications with
18 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
19 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
20 Arroz Open Letter (attached) ; Book Sales; Facebook costs; communications with Penny
21 Sansevieri. In addition, Respondent objects that the documents are equally accessible to
22 propounding party and include videos at
23 <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and the videos found at
24 this url - <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
25 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
26 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
27 (attached.) See also Tomlinson communication (attached.)

28 **Special Interrogatory No. 50:**

Identify all persons with knowledge of facts related to Your contention that the Statement
was substantial factor in causing You harm.

Response to Special Interrogatory No. 50:

Jonathan Del Arroz, Lori Buschbaum, Kevin Roche, Lou Antonelli, Robert Kroese, Bryan Niemeier, Jagi Lamplighter, John C. Wright, and Penny Sansevieri.

Special Interrogatory No. 51:

Describe all expenses You have had to pay as a result of the Statement.

Response to Special Interrogatory No. 51:

Del Arroz hired a marketing firm – Penny Sansevieri - for \$3,500 who advised Del Arroz that she had no ability to put his book “The Stars Entwined” into any science fiction magazine or blog. At the time of WorldCon76 Del Arroz launched a book called “The Stars Entwined” which had sales 1/6th of his prior sales of his book “For Steam and Country.” The lost sales represented lost sales of approximately one thousand books or lost profits of approximately \$5,000.

In addition, Del Arroz began purchasing advertisements on Facebook to offset the injury to reputation resulting from SFSFC’s conduct. Since August of 2018, Del Arroz has paid approximately \$2,300 for Facebook advertisements. Del Arroz also paid \$300 for BookBub.

Because of the stress, Del Arroz has been seeing a chiropractor because of stress-related shoulder and neck tension. The chiropractor is Troy Chamberlain, (925) 819-2713, 545 Sycamore Valley Road West, Danville, CA 94526. Del Arroz began seeing Chamberlain more frequently because of the stress imposed by SFSFC in June for treatments three times a week.

Special Interrogatory No. 52:

Identify all Documents that relate to Your response in the immediately preceding Interrogatory.

Response to Special Interrogatory No. 52:

Communications from Penny Sansevieri; Invoices from Facebook and Bookbub.

Special Interrogatory No. 53:

Identify all persons with knowledge of facts related to Your response in Special Interrogatory No. 51.

Response to Special Interrogatory No. 53:

Jonathan Del Arroz, Penny Sansevieri, Troy Chamberlain.

Special Interrogatory No. 54:

If you contend that the Statement was a substantial factor in causing harm to Your reputation, state all facts related to Your contention.

1 **Response to Special Interrogatory No. 54:**

2 Respondent objects that this interrogatory has been asked and answered previously and
3 that this interrogatory is unduly burdensome and oppressive. Without waiving, Respondent
4 states:

5 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
6 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
7 Facebook page:

8 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
9 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
10 supporting membership preserves his rights to participate in the Hugo Awards nomination and
11 voting process. He was informed of our decision via email. We have taken this step because he
12 has made it clear that he fully intends to break our code of conduct. We take that seriously.
13 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
14 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
15 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
16 about the decision and it is final."

17 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
18 had threatened him with removal if he visited any hotel or other public space associated with the
19 convention.

20 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
21 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
22 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

23 SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
24 intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
25 had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also
26 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
27 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
28 known this because Del Arroz had told them.

29 SFSFC also stated that "that Plaintiff would not be permitted to attend WorldCon76 due
30 to his behavior, which violated WorldCon 76's code of conduct" without specifying what that
31 behavior was or what part of the code of conduct was violated. This came after a discussion that

1 Del Arroz “harassed” individuals, presumably on the internet, but there was no evidence of such
2 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
3 that this harassment was anything other than a private dispute.

4 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
5 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
6 communication from SFSFC telling him that he would not be permitted to attend the convention
7 because he had allegedly made it clear on his personal blog that he was “planning on
8 engendering a hostile environment.”

9 After this private communication, SFSFC then announced on Facebook that Del Arroz
10 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
11 had taken this step because “he had made it clear that he fully intends to break our code of
12 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
13 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
14 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
15 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

16 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
17 made because he had identified himself as a supporter of the Presidential Campaign of Donald
18 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
19 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
20 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
21 Arroz or other Trump supporters when they were threatened and hatred was expressed against
22 them.

23 Del Arroz did not intend to violate any code of conduct. He intended to protect himself
24 from false claims that he had harassed other people. No one told him that his plan to wear a body
25 camera to document that he was not a harasser, or that he was the victim of harassment, would
26 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
27 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
28 engaged in free speech as contemplated by the First Amendment.

29 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
30 with the Bay Area science fiction community. This changed during the course of the 2016
31 presidential campaign.

1 **Special Interrogatory No. 55:**

2 Identify all Documents that relate to Your response in the immediately preceding
3 interrogatory.

4 **Response to Special Interrogatory No. 55:**

5 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
6 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
7 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
8 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
9 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
10 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
11 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
12 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
13 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
14 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
15 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
16 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
17 Kevin Roche; Communications with Incident Response Team (attached); Communications with
18 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
19 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
20 Arroz Open Letter (attached) ; Book Sales; Facebook costs; communications with Penny
21 Sansevieri. Respondent objects that the documents are equally accessible to propounding party
22 and include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and
23 the videos found at this url -

24 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
25 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
26 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
27 (attached.) See also Tomlinson letter (attached.)

28 **Special Interrogatory No. 56:**

Identify all persons with knowledge Interrogatory No. 54.

1 **Response to Special Interrogatory No. 56:**

2 Jonathan Del Arroz, Lori Buschbaum, Kevin Roche, Penny Sansevieri, Lou Antonelli,
3 Robert Kroese, Bryan Niemeier, Jagi Lamplighter, John C. Wright.

4 **Special Interrogatory No. 57:**

5 If You contend Propounding Party acted with malice, hatred or ill will towards You in
6 making the Statement, state all facts related to Your contention.

7 **Response to Special Interrogatory No. 57:**

8 Respondent objects that this interrogatory has been asked and answered previously and
9 that this interrogatory is unduly burdensome and oppressive. Without waiving, Respondent
10 states:

11 In 2018, as part of banning Plaintiff Jonathan Del Arroz from its convention, Defendant
12 San Francisco Science Fiction Conventions, Inc. ("SFSFC") posted the following on its
13 Facebook page:

14 "Worldcon 76 has chosen to reduce Jonathan Del Arroz's membership from attending to
15 supporting. He will not be allowed to attend the convention in person. Mr. Del Arroz's
16 supporting membership preserves his rights to participate in the Hugo Awards nomination and
17 voting process. He was informed of our decision via email. We have taken this step because he
18 has made it clear that he fully intends to break our code of conduct. We take that seriously.
19 Worldcon76 strives to be an inclusive place in fandom, as difficult as that can be, and racist and
20 bullying behavior is not acceptable at our Worldcon. This expulsion is one step toward
21 eliminating such behavior and was not taken lightly. The senior staff and board are in agreement
22 about the decision and it is final."

23 This announcement came after SFSFC had told Del Arroz of its decision to ban him and
24 had threatened him with removal if he visited any hotel or other public space associated with the
25 convention.

26 Del Arroz had previously told Kevin Roche that he was concerned about threats to his
27 own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
28 describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

Del Arroz had previously told Kevin Roche that he was concerned about threats to his
own security because of his conservatism. When Del Arroz mentioned "hijinks" he was
describing "hijinks" directed at Del Arroz, not perpetrated by Del Arroz.

SFSFC did not investigate Del Arroz's plans. It did not contact Del Arroz about his
intentions. It did not follow up on his concern that he could be attacked at WorldCon76, as he
had been attacked at home. The fact that SFSFC did not communicate with Del Arroz is also

1 evidence of actual malice: it simply did not care about the truth it knew, namely that Del Arroz
2 was intending to use the body cam for his own security. SFSFC reasonably knew or should have
3 known this because Del Arroz had told them.

4 SFSFC also stated that “that Plaintiff would not be permitted to attend WorldCon76 due
5 to his behavior, which violated WorldCon 76’s code of conduct” without specifying what that
6 behavior was or what part of the code of conduct was violated. This came after a discussion that
7 Del Arroz “harassed” individuals, presumably on the internet, but there was no evidence of such
8 conduct, or that there was such a code of conduct concerning that behavior, or, most importantly,
9 that this harassment was anything other than a private dispute.

10 Plaintiff Jonathan Del Arroz purchased a ticket to WorldCon76 with the plan of
11 attending, selling his books, and otherwise networking. In January of 2018, Del Arroz received a
12 communication from SFSFC telling him that he would not be permitted to attend the convention
13 because he had allegedly made it clear on his personal blog that he was “planning on
14 engendering a hostile environment.”

15 After this private communication, SFSFC then announced on Facebook that Del Arroz
16 had been banned from WorldCon76, that he had been informed of this decision, and that SFSFC
17 had taken this step because “he had made it clear that he fully intends to break our code of
18 conduct, which SFSFC took seriously because “racist and bullying behavior is not acceptable at
19 our Worldcon,” and that the “expulsion is one step toward eliminating such behavior.” In short,
20 SFSFC essentially told the general public on Facebook that Del Arroz had been banned because
21 he intended to break SFSFC’s code of conduct by engaging in racist and bullying behavior.

22 SFSFC’s statement was false. Del Arroz is not a racist or a bully. This accusation was
23 made because he had identified himself as a supporter of the Presidential Campaign of Donald
24 Trump. Since coming out as a Trump supporter, Del Arroz has been “doxed,” i.e., his private
25 address has been disclosed so that he can be harassed in real life, and, in fact, someone used that
26 information to send harassing mail to his home. In contrast, SFSFC took no action to protect Del
27 Arroz or other Trump supporters when they were threatened and hatred was expressed against
28 them.

Del Arroz did not intend to violate any code of conduct. He intended to protect himself
from false claims that he had harassed other people. No one told him that his plan to wear a body
camera to document that he was not a harasser, or that he was the victim of harassment, would

1 violate any code of conduct. Other people were allowed to wear body cameras. Del Arroz is not
2 a racist or a bully. He has condemned racism and is Hispanic. He has not bullied anyone; he has
3 engaged in free speech as contemplated by the First Amendment.

4 In addition, prior to coming out as a Trump supporter, Del Arroz had good relationship
5 with the Bay Area science fiction community. This changed during the course of the 2016
6 presidential campaign.

7 **Special Interrogatory No. 58:**

8 Identify all Documents that relate to Your response in the immediately preceding
9 interrogatory.

10 **Response to Special Interrogatory No. 58:**

11 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
12 in Opposition to SLAPP Motion (“Del Arroz Declaration.”); Email Communication between Del
13 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
14 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
15 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
16 Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
17 attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
18 G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as
19 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
20 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
21 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
22 Exhibit L to Del Arroz Declaration; WorldCon76 Post “Membership Action Taken Today” by
23 Kevin Roche; Communications with Incident Response Team (attached); Communications with
24 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
25 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
26 Arroz Open Letter (attached) ; Book Sales; Facebook costs; communications with Penny
27 Sansevieri. Respondent objects that the documents are equally accessible to propounding party
28 and include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and
the videos found at this url -
<https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
<https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen

1 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>

2 (attached.) See also Tomlinson letter (attached.)

3 **Special Interrogatory No. 59:**

4 Identify all persons with knowledge of facts related to Your response in Special
5 Interrogatory No. 57.

6 **Response to Special Interrogatory No. 59:**

7 Jonathan Del Arroz, Lori Buschbaum, Kevin Roche.

8 **Special Interrogatory No. 60:**

9 Describe each item of damage You are claiming in your Complaint.

10 **Response to Special Interrogatory No. 60:**

- 11 A. Pecuniary damages for lost sales;
12 B. Expenses incurred in mitigation of damages;
13 C. Lost Value of Marketing;
14 D. Injury to reputation;
15 E. Emotional distress.

16 **Special Interrogatory No. 61:**

17 State the amount of each item of damages you are claiming in your Complaint.

18 **Response to Special Interrogatory No. 61:**

- 19 A. Pecuniary damages for lost sales: \$7,000;
20 B. Expenses incurred in mitigation of damages: \$2,600;
21 C. Lost Value of Marketing: \$3,500;
22 D. Injury to reputation - \$1 million;
23 E. Emotional distress - \$1 million.

24 **Special Interrogatory No. 62:**

25 State how each amount of damages is calculated.

26 **Response to Special Interrogatory No. 62:**

27 Pecuniary damages for lost sales: Del Arroz intended to sell his books at WorldCon 76.
28 Based on his prior experience in selling books at other conventions, he expected to sell
approximately 60 to 100 books for a profit of \$1,200 to \$2,000. He was prevented from making
such sales by defendant. At the time of WorldCon76 Del Arroz launched a book called "The
Stars Entwined" which had sales 1/6th of his prior sales of his book "For Steam and Country."

1 The lost sales represented lost sales of approximately one thousand books or lost profits of
2 approximately \$5,000. Other book sales of Del Arroz's books were also affected.

3 Expenses incurred in Mitigation of Damages: In addition, Del Arroz began purchasing
4 advertisements on Facebook to offset the injury to reputation resulting from SFSFC's conduct.
5 Since August of 2018, Del Arroz has paid approximately \$2,300 for Facebook advertisements.
6 Del Arroz also paid \$300 for BookBub.

7 Lost Value of Marketing: Del Arroz hired a marketing firm – Penny Sansevieri - for
8 \$3,500 who advised Del Arroz that she had no ability to put his book "The Stars Entwined" into
9 any science fiction magazine or blog.

10 Injury to reputation – injury to reputation is determined by the jury based on the
11 particular facts and circumstances of the defamation.

12 Emotional distress – emotional distress is determined by the jury based on the particular
13 facts and circumstances of the emotional distress.

14 **Special Interrogatory No. 63:**

15 Identify all persons who have knowledge of each item of damages You are claiming in
16 your Complaint.

17 **Response to Special Interrogatory No. 63:**

18 Jonathan Del Arroz, Penny Sansevieri, Lou Antonelli, Robert Kroese, Bryan Niemeier,
19 Jagi Lamplighter, John C. Wright.

20 **Special Interrogatory No. 64:**

21 Identify all documents relating to each item of damages You are claiming in Your
22 complaint.

23 **Response to Special Interrogatory No. 64:**

24 Email Communications from WorldCon attached as Exhibit A to Del Arroz Declaration
25 in Opposition to SLAPP Motion ("Del Arroz Declaration."); Email Communication between Del
26 Arroz and Kevin Roche attached as Exhibit B to Del Arroz Declaration; Email Communication
27 from Incident Response Team attached as Exhibit C to Del Arroz Declaration; Email
28 Communications from WorldCon76 attached as Exhibit D to Del Arroz Declaration; Lori
Buschbaum Posting attached as Exhibit E to Del Arroz Declaration; WorldCon Announcement
attached as Exhibit F to Del Arroz Declaration; WorldCon76 Announcement attached as Exhibit
G to Del Arroz Declaration; Comment thread in WorldCon76 comment thread attached as

1 Exhibit H to Del Arroz Declaration; Del Arroz anti-racist statement attached as Exhibit I to Del
2 Arroz Declaration; Doxxing post attached as Exhibit J to Del Arroz Declaration; Nick Ban Nazis
3 Mamatas thread attached as Exhibit K to Del Arroz Declaration; SFSFC posting attached as
4 Exhibit L to Del Arroz Declaration; WorldCon76 Post "Membership Action Taken Today" by
5 Kevin Roche; Communications with Incident Response Team (attached); Communications with
6 Kevin Roche (attached); Communications with Aaron Pound (attached); Buschbaum Posts
7 (attached); WorldCon76 Code of Conduct; WorldCon76 posts and comments (attached); Del
8 Arroz Open Letter (attached); Book Sales; Facebook costs; communication with Penny
9 Sansevieri. Respondent objects that the documents are equally accessible to propounding party
10 and include videos at <https://www.youtube.com/channel/UCcUFuNUVh9lh93iwDmkPEcQ> and
11 the videos found at this url -
12 <https://duckduckgo.com/?q=worldcon76+youtube&t=hd&iax=videos&ia=videos> or
13 <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>. See Screen
14 Shot of <https://www.bing.com/videos/search?q=worldcon76+videos&FORM=HDRSC3>
15 (attached.) See also Tomlinson letter (attached.)
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Dated: September 20, 2019

Peter Sean Bradley, Esq.

By: Peter Sean Bradley
Peter Sean Bradley
Attorney for Plaintiff

VERIFICATION

I, Jonathan Del Arroz, am the plaintiff in in the above-entitled action. I have read the foregoing responses contained in the Responses to Special Interrogatory, Set Number 1, which are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this verification was executed in

Plasencia, CA

Dated:

9/20/19

Signed:

[Signature]

Name:

Jonathan Del Arroz

1 **PROOF OF SERVICE**

2 I am a resident of the State of California, over the age of eighteen years, and
3 not a party to the within action. My business address is 7045 N. Fruit Avenue, Fresno,
4 California. On September 20, 2019, I served the within documents:

5 ***RESPONSES TO SPECIALLY PREPARED INTERROGATORIES, SET NO. 1***

6 ☐

BY FAX: by transmitting via facsimile the document(s) listed above to the
fax number(s) set forth below on this date before 5:00 p.m.

7 ☐

BY HAND: by personally delivering the document(s) listed above to the
person(s) at the address(es) set forth below.

8 ☒

9 **BY MAIL:** by placing the sealed envelope for collection and processing
for mailing, following this business's usual practices, with which I am
10 readily familiar. On the same day correspondence is placed for collection
and mailing, it is deposited in the ordinary course of business with the
11 United States Postal Service.

12 ☐

BY OVERNIGHT MAIL: by causing document(s) to be picked up by an
overnight delivery service company for delivery to the addressee(s) on the
13 next business day.

14 ☐

BY PERSONAL DELIVERY: by causing personal delivery by
_____ of the document(s) listed above to the person(s) at the
15 address(es) set forth below.

16 Ann A. P. Nguyen
17 Lindsey V. Pho
18 MESSNER REEVES LLP
19 160 W. Santa Clara Street, Suite 1000
San Jose, CA 95113
Facsimile: (408) 298-0477

20 I am readily familiar with the firm's practice of collection and processing
21 correspondence for mailing. Under that practice it would be deposited with the U.S. Postal
22 Service on that same day with postage thereon fully prepaid in the ordinary course of
23 business. I am aware that on motion of the party served, service is presumed invalid if
postal cancellation date or postage meter date is more than one day after date of deposit for
mailing in affidavit.

24 I declare under penalty of perjury under the laws of the State of California
25 that the above is true and correct. Executed on September 20, 2019, at Fresno, California.

26
27 
28 Yer Xiong

EXHIBIT "E"

ANN A. P. NGUYEN [SBN 178712]
anguyen@messner.com

LINDSEY V. PHO [SBN 291881]
lpho@messner.com

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Attorneys for Defendant
SAN FRANCISCO SCIENCE FICTION
CONVENTIONS, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

JONATHAN DEL ARROZ,

Plaintiff,

v.

SAN FRANCISCO SCIENCE FICTION
CONVENTIONS, INC. ("SFSFC") aka
"WORLDCON76" David W. Gallaher (2019),
President; David W. Clark (2020), Vice
President; Lise Detusch Harrigan (2020),
Treasurer; Kevin Standlee (2018), Secretary;
Sandra Childress (2019); Bruce Farr (2018),
Chair; 2018 SMOF Con Committee; Cheryl
Morgan (2020); Kevin Roche (2018), Chair;
2018 Worldcon (Worldcon 76) Committee;
Cindy Scott (2018); Randy Smith (2019),
Chair; New Zealand 2020 Worldcon Agent
Committee; Andy Trembley (2020); Jennifer
"Radar" Wylie (2019), Chair; CostumeCon
2021 Organizing Committee; Lori
Buschhaum; Susie Rodriguez and DOES 1
through 30, inclusive.,

Defendants.

Case No. 18-CV-334547

**DEFENDANT SAN FRANCISCO
SCIENCE FICTION CONVENTIONS,
INC.'S REQUEST FOR ADMISSIONS TO
PLAINTIFF (SET NO. TWO)**

PROPOUNDING PARTY: Defendant SAN FRANCISCO SCIENCE FICTION
CONVENTIONS, INC.

RESPONDING PARTY: Plaintiff JONATHAN DEL ARROZ

SET NO.: TWO

Pursuant to the provisions of Code of Civil Procedure sections 2033.010 et seq., Defendant

1 San Francisco Science Fiction Conventions, Inc. requests that, within thirty days of service of this
2 demand (thirty-five days if the request was mailed), you admit or deny separately and completely,
3 in writing and under oath, the truthfulness of each of the following consecutively numbered facts.

4 Each answer shall be as complete and straightforward as the information available to you
5 permits. Each answer shall (A) admit so much of the matter involved in the request as is true, either
6 as expressed in the request itself or as reasonably and clearly qualified by you, (B) deny so much of
7 the matter involved in the request as is untrue, and (C) specify so much of the matter involved in the
8 request as to the truth of which you sufficient information or knowledge.

9 If you state that you lack sufficient knowledge to respond to any item, you must state in the
10 answer that you have conducted a reasonable inquiry concerning the matter in the particular request
11 and despite that inquiry, the information known or readily obtainable is insufficient to enable to you
12 to admit the matter. A reasonable inquiry includes a good faith effort to obtain the information by
13 inquiry to natural personas or organizations under your custody and control. The inquiry you are
14 required to make includes, but is not limited to, your agents, employees, attorneys and accountants.

15 If a portion of any item is legally objectionable or privileged matter, the objection or
16 privilege should be clearly stated, and the remainder of the request shall be answered to the extent
17 possible. Claims of work product protection pursuant to Code of Civil Procedure section 2018.030
18 *et seq.* must be expressly stated.

19 Your failure to admit the truth of any specific matter may result in the issuance of a court
20 order directing you to pay the costs and attorney's fees associated with the establishment of fact.

21 You are required to sign your response under oath unless it consists exclusively of
22 objections. If you are a partnership, association, or governmental agency, one of your officers of
23 agents shall sign the response under oath on behalf of the entity.

24 Failure to serve a proper and timely response to this request may result in a waiver of your
25 legal rights in whole or part, including the possibility that the court may deem these matters admitted
26 and refuse to accept evidence to the contrary.

27 **DEFINITIONS**

28 For purposes of these interrogatories, the following definitions and instructions shall apply:

A. “You,” “Your” or “Responding Party” as used herein shall mean Jonathan Del Arroz, and anyone else acting on your behalf.

B. "Person" or "Persons" means natural persons, firms, proprietorships, associations, partnerships, corporations and every other type of organization or entity.

C. “Related,” “Relating,” or “Relate” means consisting of, referring to, describing, discussing, constituting, evidence containing, reflecting, mentioning, concerning, citing, summarizing, analyzing, or bearing any logical or factual connection with the matter discussed.

D. “All” shall be construed to include “Any” and vice versa.

E. “Each” shall be construed to include “Every” and vice versa.

F. “WORLDCON 76” shall refer to the 76th annual World Science Fiction Convention.

G. “CODE OF CONDUCT” shall refer to the WorldCon 76 Code of Conduct, posted on or about April 13, 2017 on the WorldCon 76 website (www.worldcon76.org), and attached hereto as Exhibit “A”.

H. “Tweet” or “Tweets” shall mean a post or posts made on the social media application Twitter.

REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1¹:

Admit that the CODE OF CONDUCT was posted publicly on the WORLDCON 76 website (www.worldcon76.org) in 2017.

REQUEST FOR ADMISSION NO. 2:

Admit that in 2017, YOU were aware of the CODE OF CONDUCT.

REQUEST FOR ADMISSION NO. 3:

Admit that the CODE OF CONDUCT states that “Harassment is any behavior that annoys

¹ Defendant originally served Requests for Admission numbers 1, 2, 3, 4, 7, and 8 with Set One, but inadvertently did not attach Exhibit A. After meeting and conferring with counsel, Plaintiff agreed that Defendant could ask the same RFAs again without receiving an objection regarding duplicity.

1 other persons, aggravates them, or makes them feel unsafe. This includes but is not limited to:
2 unwanted or threatening physical contact, unwanted or threatening verbal contact, following
3 someone in a public area without a legitimate reason, and threatening physical harm in any way.”

4 **REQUEST FOR ADMISSION NO. 4:**

5 Admit that in 2017, YOU knew that harassment of WORLDCON 76 members violated the
6 CODE OF CONDUCT.

7 **REQUEST FOR ADMISSION NO. 7:**

8 Admit that the CODE OF CONDUCT states, “Worldcon76 does not tolerate
9 discrimination in any form – including through cosplay – based on but not limited to gender, race,
10 ethnicity, religion, age, sexual orientation, gender identity, or physical/mental health conditions.”

11 **REQUEST FOR ADMISSION NO. 8:**

12 Admit that the CODE OF CONDUCT states, “We reserve the right to revoke a
13 membership at our discretion at any time.”

14 **REQUEST FOR ADMISSION NO. 11:**

15 Admit that your Twitter username is @jondelarroz.

16 **REQUEST FOR ADMISSION NO. 12:**

17 Admit your Twitter account has been suspended for violating Twitter’s rules against
18 hateful conduct.

19 **REQUEST FOR ADMISSION NO. 13:**

20 Admit that you call yourself “The Leading Hispanic Voice in Science Fiction.”

21 **REQUEST FOR ADMISSION NO. 14:**

22 Admit that Exhibit “B” is a fair representation of part of your Twitter page in 2018.

23 **REQUEST FOR ADMISSION NO. 15:**

24 Admit that Exhibit “C” is a fair representation of your “Bio” page from your website,
25 delarroz.com/bio.

26 **REQUEST FOR ADMISSION NO. 16:**

27 Admit that on October 11, 2017 you posted the Tweet shown in Exhibit “D.”
28

1 **REQUEST FOR ADMISSION NO. 17:**

2 Admit that on August 11, 2017 you posted the Tweet shown in Exhibit “E.”

3 **REQUEST FOR ADMISSION NO. 18:**

4 Admit that on December 9, 2017 you posted the Tweet shown in Exhibit “F.”

5 **REQUEST FOR ADMISSION NO. 19:**

6 Admit that on August 19, 2017 you posted the Tweet shown in Exhibit “G.”

7 **REQUEST FOR ADMISSION NO. 20:**

8 Admit that on August 27, 2017 you posted the two Tweets shown in Exhibit “H.”

9 **REQUEST FOR ADMISSION NO. 21:**

10 Admit that on August 29 and 30, 2017 you posted the four Tweets shown in Exhibit “I.”

11 **REQUEST FOR ADMISSION NO. 22:**

12 Admit that on September 19, 2017 you posted the Tweet shown in Exhibit “J.”

13 **REQUEST FOR ADMISSION NO. 23:**

14 Admit that on September 26, 2017 you posted the two Tweets show in Exhibit “K.”

15 **REQUEST FOR ADMISSION NO. 24:**

16 Admit that on December 21, 2017 you posted the Tweet shown in Exhibit “L.”

17 **REQUEST FOR ADMISSION NO. 25:**

18 Admit that on September 19, 2017 you posted the Tweet shown in Exhibit “M.”

19 **REQUEST FOR ADMISSION NO. 26:**

20 Admit that on October 5, 2017 you posted a Tweet saying “I don’t like to air private
21 communications but the amount of vitriol I’ve faced cuz of her is out of control,” as shown in
22 Exhibit “N.”

23 **REQUEST FOR ADMISSION NO. 27:**

24 Admit that your Tweet shown in Exhibit “N,” was in response to an email from Cat
25 Rambo.

26 **REQUEST FOR ADMISSION NO. 28:**

27 Admit that on December 17, 2017 you posted a Tweet saying “Pedophile defender
28 @CatRambo unironically tweets about wrongthink while literally working overtime to ensure

1 actual “wrongthinkers” are blackballed from scifi publishing and purged from @SFWA if they
2 don’t have the right politics,” as shown in Exhibit “O.”

3 **REQUEST FOR ADMISSION NO. 29:**

4 Admit that your Tweet shown in Exhibit “O” was in response to a Tweet from Cat Rambo.

5 **REQUEST FOR ADMISSION NO. 30:**

6 Admit that on December 11, 2017 you posted a Tweet saying “A kind reader ran
7 @PrinceJvstin’s attacks through google translate for those who don’t speak cuckese so you can
8 understand what he’s talking about with ‘corrective to the male gaze.’ Makes sense now. Go get
9 her, Paul!” as shown in Exhibit “P.”

10 **REQUEST FOR ADMISSION NO. 31:**

11 Admit that on December 12, 2017 you posted a Tweet saying “Are gammas always this
12 passive aggressive? Reminds me of my boy @PrinceJvstin” as shown in Exhibit “Q.”

13 **REQUEST FOR ADMISSION NO. 32:**

14 Admit that your Tweet shown in Exhibit “Q” was in response to a Tweet from Kevin
15 Roose.

16 **REQUEST FOR ADMISSION NO. 33:**

17 Admit that your username on Gab is @otomo.

18 **REQUEST FOR ADMISSION NO. 34:**

19 Admit that in 2017 you posted “Commence Operation: Troll The Shit Out Of SJW Sci-Fi
20 Authors on Twitter. If you want to participate, ping me. I’ll start a chat.” as shown in Exhibit “R.”

21 **REQUEST FOR ADMISSION NO. 35:**

22 Admit that on May 30, 2017 you posted “It’s his recommendation. It’s his prerogative. Go
23 concern troll somewhere else, sperg.” as shown in Exhibit “S.”

24 **REQUEST FOR ADMISSION NO. 36:**

25 Admit that on September 5, 2017, you posted the two Tweets shown in Exhibit “T.”

26 **REQUEST FOR ADMISSION NO. 37:**

27 Admit that on September 6, 2017 you posted the Tweet shown in Exhibit “U.”
28

1 **REQUEST FOR ADMISSION NO. 38:**

2 Admit that on December 12, 2017 you published “How To Lose A Guy In Any One Of 10
3 Questions” attached hereto as Exhibit “V.”

4 **REQUEST FOR ADMISSION NO. 39:**

5 Admit that on December 20, 2017 you posted the two Tweets shown in Exhibit “W.”

6 **REQUEST FOR ADMISSION NO. 40:**

7 Admit that in August 2019, you posted the Tweets shown in Exhibit “X.”

8 **REQUEST FOR ADMISSION NO. 41:**

9 Admit that you posted the Facebook posts shown in Exhibit “Y.”

10 **REQUEST FOR ADMISSION NO. 42:**

11 Admit that you posted the Tweet shown in Exhibit “Z.”

12 Dated: March 25, 2020

MESSNER REEVES LLP

14 By: /s/ Lindsey Pho

15 ANN A. P. NGUYEN

LINDSEY V. PHO

16 Attorneys for Defendant

17 SAN FRANCISCO SCIENCE FICTION
18 CONVENTIONS, INC.

EXHIBIT A



Worldcon 76 Code of Conduct

[\[/component/content/article/13-code-of-conduct/33-worldcon-76-code-of-conduct?Itemid=101\]](/component/content/article/13-code-of-conduct/33-worldcon-76-code-of-conduct?Itemid=101)

© Thursday, April 13, 2017 👤 Kevin Roche

Worldcon 76 Code of Conduct

SFSFC corporate policy requires that all SFSFC events publish and enforce code of conduct and anti-harassment (http://sfsfc.org/?page_id=636) policies (http://sfsfc.org/?page_id=636).

Worldcon 76 in San Jose is a San Francisco Science Fiction Conventions, Incorporated (SFSFC) event.

SFSFC, Inc. is chartered to promote and develop fantasy and science fiction in all their forms. SFSFC events include educational and social activities. Our goal is to show how fantasy and science fiction can be serious and artistic, and fun and accessible to everybody.

We fail in that goal if we create an environment where harassment of attendees and participants is condoned. Victims of harassment will not enjoy an event and will not find fantasy and science fiction to be fun or accessible. SFSFC and its event-planning teams are committed to responding respectfully to reports of harassment and taking appropriate action to stop harassment that is brought to our attention.

Worldcon 76 in San Jose abides by Wil Wheaton's Law. (www.knowyourmeme.com/memes/wheatons-law) (<http://www.knowyourmeme.com/memes/wheatons-law>)

CREDIT WHERE CREDIT IS DUE:

These rules are heavily lifted from Further Confusion, the SF Bay Area's furry convention. We're grateful to AAE for their work in creating a fun and safe environment at Further Confusion. It's also based on the Code of Conduct for Westercon 66.

IF YOU NEED ASSISTANCE

Worldcon 76 in San Jose will have an Ombudsman team available throughout the convention. Its role is to assist you if you have any problems at the convention. Call (346) 298 - 1338 and ask for the Worldcon 76 in San Jose Ombudsman on duty, or visit the Member Services office and ask to speak to an Ombudsman member. Any convention staff member can help you contact an Ombudsman as well. Remember, we cannot address a problem unless we know about it. If team members cannot assist you immediately, the Ombudsman team will have someone contact you as soon as possible who can. As with all messages left with the Ombudsman team, remember to give details of how, when, and where you can be contacted. You can also email the team at ombudsman@worldcon76.org.

HARASSMENT AND ASSAULT

Harassment is any behavior that annoys other persons, aggravates them, or makes them feel unsafe. This includes but is not limited to:

- Unwanted or threatening physical contact,
- Unwanted or threatening verbal contact,

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<http://www.worldcon76.org>

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(<http://www.worldcon76.org/>)

- Following someone in a public area without a legitimate reason, and
- Threatening physical harm in any way.

Additionally, Worldcon 76 does not tolerate discrimination in any form -- including through cosplay -- based on but not limited to gender, race, ethnicity, religion, age, sexual orientation, gender identity, or physical/mental health conditions.

A neat tattoo or a sexy, excellent costume does not come with permission to touch, nor is it an invitation to do so. Always ask if you may touch clothing, property, or the person. Costuming is not consent.

If you are being bothered or are uncomfortable with someone's actions toward you, communicate any one of these messages:

- "No." No means no.
- "Please stop." Stop means stop.
- "Please go away." Go away means go away.

If someone won't understand these simple rules, contact our Ombudsman Team for assistance, or ask any convention staff member to do so on your behalf.

All guests and members of this convention have the right to not join in activities that cause them any form of discomfort and to speak out if they feel harassed or unsafe. Offenders may lose their badges and be asked to leave the convention. The matter may be referred to law enforcement authorities.

Treat people as you'd want others to treat your sister or brother. Complaints will be taken very seriously. We reserve the right to revoke a membership at our discretion at any time.

PARTIES, ALCOHOL, AND ZERO DRUG TOLERANCE

Worldcon 76 in San Jose does not tolerate serving of alcohol to individuals under 21 years of age. If you are hosting a party where alcohol is being served, it is your responsibility as host to ensure that the age of anyone drinking alcohol is checked. You should also designate someone not to drink, so that there is a fully competent person present to deal with any emergencies that might arise.

Section 25660 of the Business & Professions Code of California states that convention parties serving alcohol can accept "bona fide" forms of identification which are currently valid and issued by a government agency containing the following information: (a) name of person, (b) a photograph, (c) a physical description, and (d) date of birth.

Acceptable form of identification:

- Driver's licenses
- Passports
- Passport cards
- Military identifications

All properties associated with Worldcon 76 and its functions are non-smoking and non-vaping, which includes cannabis. Cannabis edibles in any form may not be served at the convention.

Worldcon 76 does not tolerate the use of illegal substances.

Serving or dosing individuals with any form of intoxicant without their explicit consent is strictly forbidden.

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(<http://www.worldcon76.org>)

Violation of the above rules could subject you to the immediate loss of your badge and convention privileges, or referral of the matter to legal or other authorities as applicable.

PHOTOGRAPHY AND VIDEO

Worldcon 76 in San Jose wants you to have great memories from a fantastic convention. Photographs and videotape footage by attendees are generally allowed in all common areas of the convention with the exception of the Art Show. Specific rules regarding these matters may exist for selected events, such as concerts. Please consult the Pocket Program for information relating to specific events.

When photographing or videotaping individuals or costumes, use common courtesy and ask before photographing them. Respect their rights if they do not wish to be photographed or videotaped. If someone asks or otherwise indicates (remember many folks in costume do not speak) that they do not wish to be photographed, do not photograph them!

Photography or videography for the purpose of sale or publication to the press is expressly forbidden unless written permission has been obtained from Worldcon 76 in San Jose.

Individuals may take pictures and videotapes for private viewing or sharing with friends. We ask our attendees to be courteous to those they wish to take pictures of, especially if you wish to place those pictures or video clips onto a personal Web page or similar Internet archive. In this case, ask your subjects for their explicit permission to do this.

The services of an official professional photographer are used for Worldcon 76. By registering for the Worldcon 76, you agree to allow Worldcon 76/SFSFC to use your photograph in Worldcon 76-related publications, on the Worldcon 76 website, or in other Worldcon 76/SFSFC materials.

HAVE A FUN AND SAFE CONVENTION!

If you have questions or comments regarding Worldcon 76 in San Jose policies, please contact our Ombudsman and IRT Area Head, Lori Buschbaum, at ombudsman@worldcon76.org (<mailto:ombudsman@worldcon76.org>)

Weapon and Costume Policy

(/component/content/article/13-code-of-conduct/94-weapons-and-costume-policy?Itemid=101)

🕒 Thursday, April 13, 2017 🧑 Kevin Roche

- No firearms, airsoft weapons, tazers, batons, pepper spray, or replicas of guns. No functional bows and arrows. Any prop guns must look like a prop from 50 feet away. This is for your safety and for the safety of our other members.
- No costume may generate odor, smoke, or fog, or have overly bright or flashing lights.
- No live steel. Live steel is defined as swords, knives, or other objects made of metal, which can take an edge. Dull metal weapons are considered live steel, and therefore are not permitted.
- No metal or wood bats, metal pipes, or long metal chains.
- Any item that is designed or manufactured with the intent to cause bodily injury or death, any item that is illegal in the state of California, or any other item that appears dangerous or may pose a risk of harm will not be allowed on the premises. This will be up to the sole discretion of qualified con staff.

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(<http://www.worldcon76.org/>)

- Operating a prop to shoot an object of any material is not allowed at the con and will result in your peacebond being removed.
- Current US military uniforms, costumes that may be confused with law enforcement, or other emergency response personnel are not permitted at con.
- If you buy a prop/livesteele at con, you may have it tagged with a peacebond if it belongs with the costume/cosplay you are currently wearing and follows the weapon policy. If not, it needs to be removed from the premises and taken to your hotel room or off-site.
- You may display your prop weapons only as costume pieces. Do not swing or brandish your prop weapon in any way that could be considered unsafe or threatening.
- You may pose with a prop weapon in a brandishing manner, so long as no reasonable person would interpret it as anything but a pose for dramatic effect. Con management may stop your posed brandishing in their sole discretion.

HAVE A FUN AND SAFE CONVENTION!

If you have questions or comments regarding Worldcon 76 in San Jose policies, please contact our IRT Area Head, Lori Buschbaum, at ombudsman@worldcon76.org (<mailto:ombudsman@worldcon76.org>)

Party Guidelines (/travel-lodging/suites/party-guidelines)

🕒 Friday, July 27, 2018 📍 Worldcon 76

Register Your Party!

Please remember that we need to know if you're planning to host a party at Worldcon. You can contact us at atparty@worldcon76.org. Whether it is a small private gathering of friends or a big blowout, please register your party and let us know your plans. This will enable us to provide you with a party kit filled with helpful supplies!

Please note: The Fairmont Hotel is the only approved hotel for public and private parties. If you do not currently have a suite reserved, please contact the Fairmont and request to be blocked on floors 4, 5, or 7 in the South Tower.

Alcohol Policy

Alcohol restrictions have been legally clarified, and we are replacing previous guidelines with these -- this applies to parties both public & private:

1. You must check photo ID for legal age (21 years old) -- your party's bartender is legally responsible. You must be at least 21 years old to serve alcohol. (Convention badges in no way verify an attendee's age.)
2. "Last Call" is 1:30 AM, no serving alcohol after 2:00 AM.
3. Alcohol may **not** be sold.

Signage/Taping onto Walls

We encourage you to advertise your public party in convention publications, with flyers on your Fan Table (if you have one), and on the party boards that will be located at the Fairmont & Marriott hotel, and Convention Center.

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The **Convention Center** allows computer-generated (professional-looking) signage on our party board. If your flyers are posted anywhere but on the party boards, you are absolutely responsible for taking them down after your party.

The **Fairmont Hotel** also allows computer-generated (professional-looking) signage on our party board on the 1st floor (not on lobby walls, or other non-designated spaces). If you are putting up decor in your party room, you may only use painter's tape to affix it to walls.

The **Marriott Hotel** will not be hosting public parties, and as such there's no need for posting flyers in lobbies, hallway walls or doors. We hope to have a party board in the lobby there as well, so that people enjoying the hospitality of Consuite will also be able to find you.

Promote your Party in the Newsletter!

If you are hosting a public party, the Worldcon 76 newsletter wants your "Party Previews!" Rather than tell members about parties that have already happened, we want to get members excited about upcoming parties ahead of time. Email your info to newsletter@worldcon76.org (<mailto:newsletter@worldcon76.org>)

Party Competition

We will be collecting ballots and awarding titles for:

- Best Food
- Best Themed Drink
- Best Decor
- Best Overall Party

Ballots will be available at Registration and on the party floors. Ballot boxes will be on the party floors while parties are going on, and will be located in Party Ops (location TBD in the Fairmont) the rest of the time. **Please Note:** All ballots should be filled out by the member voting. Valid ballots will require the members badge number, badge name and registered name. Any appearance of ballot stuffing or pre-filled ballots will result in your party being disqualified from the awards.

Fairmont Hotel's Amenities

The **Fairmont** offers WiFi for a surcharge. **Pro Tip:** If you [join the Fairmont's loyalty program](https://www.accorhotels.com/gb/leclub/partners/landingpage.shtml) (<https://www.accorhotels.com/gb/leclub/partners/landingpage.shtml>) (free, please sign up now) you get free WiFi.

You may rent a fridge for \$25, but they have a limited number available: first-come, first-served. Furniture removal is not an option. While cooking in the rooms is not allowed, utilizing crockpots and the like to reheat food is acceptable.

Reasonable Hotel Etiquette

As we're sure you're aware, it's best not to alarm or irritate the hotel staff. Don't be obnoxious bringing in your party supplies and decor, and treat the bell and housekeeping staff with respect and courtesy, especially if they help you! They can be your best allies sometimes with the challenges of being a host away from home. It's also a good idea to do your best as a party host to keep the noise to a level where you won't have to deal with

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complaints from neighbors, and have unwanted hotel staff knocking on your demanding you shut your party down. No smoking is allowed indoors (even vaping).

Obviously, don't damage anything. If you are sharing your suite with other parties, please check in with our party staff so we can come to your room and identify and photograph any preexisting damage so that you are not charged for it. We'll also, if you like, come through when you're done with the room and repeat the procedure.

Try to leave your room as clean as you found it, consider using the plastic sheeting we'll have available in Party Ops (TBD location), and remember to leave a tip for the housekeeping staff. Leave full garbage bags inside the room for housekeeping to pick up when they clean in the morning, or call them for a pickup.

Reasonable Convention Etiquette

Please monitor your party attendance to only allow convention attendees wearing badges. Be sure to check ID if you're serving alcohol. Use only painter's tape to hang items on the walls. Don't damage hotel property, and leave it as clean as you found it. 😊

Acquiring Ice

Ice will be available in the ice machines of the Fairmont, but use it sparingly please.

If your suite has a shower stall instead of a tub, we can arrange to provide you with an alternate container for ice and drinks. Please speak with Party Ops staff.

You can also obtain ice from nearby stores. We will be compiling a list of locations shortly.

We ask that anyone using their tubs in their rooms for storing food or soda to use a tub liner. These are available at Party Ops (location TBD) for free to registered party hosts. Hotels will charge for any damages to the tub.

Smoking Policy

Smoking is not permitted in any of our contracted hotels nor any public building. This includes common areas and guest rooms for any kind of smoking (tobacco, marijuana, vapor, whatever). Most hotels may levy a cleaning charge for a room where smoking has occurred.

San Jose Party Ops/Party Maven

Come find us in Party Ops to check in before your party. We will provide you with some Party Support supplies, and if you give us copies of your flyers we'll put them up on the party boards for you if you'd like.

Party Kit

The package we'll provide for you will include:

- Doorstop
- garbage bags
- bar towels
- sm. roll of painter's tape
- bottle opener/corkscrew
- roll of toilet paper

EXHIBIT A

**WORLDCON 76**

MEMBERSHIP >

NEWS & PUBLICATIONS >

GUESTS >

PROGRAM >

EXHIBIT HALL >

EVENTS >

HUGO AWARDS & WSFS >

TRAVEL & LODGING >

MORE WORLDCON... >

MEMBER SERVICES >

We will have a few other options for you to choose from as well, including a can opener, a plastic tarp, toothpicks, and more of the items listed above in case you need extras. If you're in a suite, you may also have a trash can, and you can borrow one of the 12" pedestal fans for the duration of your event (s). If you would like a tub liner (if you're putting ice in it to serve cold drinks) please let us know.

We will come visit your party to ensure your needs are being met. We will provide you with our contact numbers so that you can reach party team members for assistance.

Contact us

Pre-con: email Margaret Grady at parties@worldcon76.org
(<mailto:parties@worldcon76.org>), marg.grady@worldcon76.org
(<mailto:marg.grady@worldcon76.org>), marg1066@gmail.com
(<mailto:marg1066@gmail.com>) (Margaret Grady)

At-con: Our dedicated party maven line, TBA soon.



(<http://www.mindgarden.com>)



WORLD CON

76

(<http://www.worldcon76.org>)

[HOME \(/\)](#) [REGISTRATION \(/REGISTRATION\)](#)

PRESS (/PUBLICATIONS/PRESS/PRESS-
RESOURCES)

[SPONSORS \(/ABOUT-WORLDCON/SPONSORS\)](#)

[SITE MAP \(/ABOUT-WORLDCON/SITEMAP\)](#)



(<http://http://knapenblakides.nl/chair>)

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EXHIBIT A

EXHIBIT B

DELARROZ.COM



FIGHT THE
GOOD FIGHT



Tweets
37.6K

Following
3,296

Followers
4,992

Likes
66.2K

Lists
1

Follow

El Campeador

@jondelarroz

The Leading Hispanic Voice In
#ScienceFiction. Federalist contributor.
#MAGA #DeusVult. Back Flying Sparks
comic: igg.me/at/emberwar

📍 37.814001,-121.973731

🌐 delarroz.com

📅 Joined April 2010

🖼️ 2,833 Photos and videos

Tweets

Tweets & replies

Media



Pinned Tweet



El Campeador @jondelarroz · Oct 19

New Short Story: Altered Program for subscribers!

"New short story: "Altered Program!" A sex bot comes to life and gets lost in a seedy area of Tokyo!..."

New to Twitter?

Sign up now to get your own
personalized timeline!

Sign up

You may also like · Refresh



Edwin Boyette
@Edwin_Boyette



That Umbrella Guy

EXHIBIT C

DELARROZ.COM



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GOOD FIGHT

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Bio

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Bio

Share this post



Jon Del Arroz is a #1 Amazon Bestselling author, “the leading Hispanic voice in science fiction” according to PJMedia.com, and winner of the 2018 CLFA Book Of The Year Award. As a contributor to The Federalist, he is also recognized as a popular journalist and cultural commentator. Del Arroz writes science fiction, steampunk, and comic books, and can be found most weekends in section 127 of the Oakland Coliseum cheering on the A's.

Twitter: [@jondelarroz](https://twitter.com/jondelarroz)

Instagram: [@jdelarroz](https://www.instagram.com/jdelarroz)

email: [jdaguestposts \(at\) gmail \(dot\) com](mailto:jdaguestposts@gmail.com).

EXHIBIT D



El Campeador

@jondelarroz

Follow



ignore it. Post exciting rhetoric that triggers their side or brings morale to our side and don't spend the time. Example is all my tweets.

9:02 AM - 11 Oct 2017

1 Like



1

EXHIBIT E



El Campeador

@jondelarroz

Follow



Social media is for:

1. Attacking
2. Defending
3. Promotion

Nothing else. There's no real discussion or real "concern" here.

12:39 PM - 11 Aug 2017

1 Retweet 4 Likes



EXHIBIT F



El Campeador

@jondelarroz

Follow



Replying to [@getongab](#)

It's like he doesn't understand how
shitposting works as marketing. This is why
we is president now.

9:12 AM - 9 Dec 2017

2 Likes



EXHIBIT G



Jon Del Arroz   @jondelarroz · 19 Aug 2017



Replying to @jondelarroz @AnaeaLay @amberdine

I've dealt with a lot of bullies in this industry in the Mean Girls club. And will continue to speak truth.



EXHIBIT H



Jon Del Arroz @jondelarroz · 27 Aug 2017

Replying to @jondelarroz @ComradeCthulhu2 and 2 others

Picked on the wrong person, SF Mean Girls bullies.



1



Jon Del Arroz @jondelarroz · 27 Aug 2017

Replying to @ComradeCthulhu2 @AnaeaLay

Mean Girls @anaealay and @amberdine can do all the giggling and gossiping they want. I have actual readers and won't be silent about it.



2



1



1



EXHIBIT I



Jon Del Arroz @jondelarroz · 30 Aug 2017

I'm also available for interview on the matter.



[Show this thread](#)



Jon Del Arroz @jondelarroz · 30 Aug 2017

Does this mean Locus is okay with this behavior? I'm sure this can be cleared up with a public apology on behalf of Codex Writers



[Show this thread](#)



Jon Del Arroz @jondelarroz · 30 Aug 2017

As a recent subscriber to @locusmag I find it disconcerting that @amberdine works there- who advocates blackballing minority authors



[Show this thread](#)



Jon Del Arroz @jondelarroz · 29 Aug 2017

Some like @anaealay @amberdine and @bethcato support hate and bigotry thru science fiction. Readers want fun stories don't want politics!



EXHIBIT J



Jon Del Arroz   @jondelarroz · 19 Sep 2017



@Anaalay and @amberdine APPROVE of personally attacking other writers in the industry. Sick!



1



3



3



EXHIBIT K



Jon Del Arroz   @jondelarroz · 26 Sep 2017



When you question the Mean Girls of SF publishing, they gaslight you, call you troll, talk shit behind your back. [@KatanaPen](#) [@AnaeaLay](#)



3



1



7



EXHIBIT L



Jon Del Arroz  @jondelarroz · 21 Dec 2017



@amberdine liking that nonsense after how you shamefully acted toward me when I was targeted on Codex. Not good!



EXHIBIT M



Jon Del Arroz   @jondelarroz · 19 Sep 2017

New advertising campaign for @SFWA under @CatRambo's leadership.



1 3 8

EXHIBIT N



Jon Del Arroz   @jondelarroz · 5 Oct 2017

Replying to @jondelarroz @area_matter_mk2 and 2 others

I don't like to air private communications but the amount of vitriol I've faced cuz of her is out of control

Re: Fun Discussion Topic Idea

September 19, 2017 at 9:46 AM

 Found in Gmail Inbox

Your e-mails are unwanted and unsolicited. This and any further e-mails will be forwarded to my attorney.



Cat Rambo

Writer. Editor. Teacher.

Website <http://www.kittywumpus.net>

Classes <http://catrambo.teachable.com>

Newsletter <http://www.kittywumpus.net/blog/newsletter/>

Patreon <https://www.patreon.com/catrambo>

EXHIBIT O



Jon Del Arroz   @jondelarroz · 17 Dec 2017

Pedophile defender @CatRambo unironically tweets about wrongthink while literally working overtime to ensure actual "wrongthinkers" are blackballed from scifi publishing and purged from @SFWA if they don't have the right politics.



 **RainbowRiotRambo** 
@Catrambo

Follow

Wrongthink words are getting scrubbed:



CDC gets list of forbidden words: Fetus, transgender, diversity

Agency analysts have been told to avoid these seven banned words and phrases in budget documents.

[washingtonpost.com](http://www.washingtonpost.com)

2

9

22



EXHIBIT P



El Campeador

@jondelarroz

Follow



A kind reader ran [@PrinceJvstin](#)'s attacks through google translate for those who don't speak cuckese so you can understand what he's talking about with "corrective to the male gaze." Makes sense now. Go get her, Paul!

Neimer

@jvstin

Neimer

@jvstin

und that I often prefer st
y women, because it's a
e to the male gaze. (very
general, come to think)
st [@matociquala](#) and @
teampunk dollars.

trying to ge

4:06 PM - 11 Dec 2017

EXHIBIT Q



EXHIBIT R

14



Steampunk Jon Del Arroz · @otomo

10 days

Commence Operation: Troll The Shit Out Of SJW Sci-Fi Authors On Twitter.

If you want to participate, ping me. I'll start a chat.

↩ Reply ↻ Repost

EXHIBIT S



Jon D. May 30, 2017 at 7:27 PM

It's his recommendation. It's his prerogative. Go concern troll somewhere else, sperg.

EXHIBIT T



Jon Del Arroz 🇺🇸 🇵🇷 @jondelarroz · Sep 5

Nice passive aggressive attack "used to be friends" @KatanaPen. You abandoned me when @BayconNews went Mean Girls. No loyalty! Not nice!



1



3



3



Jon Del Arroz 🇺🇸 🇵🇷

@jondelarroz

Follow

Replying to @jondelarroz @KatanaPen @BayConNews

If you were a friend, you wouldn't tone police my self-defense. Go tell Sperg @Spencimus to not pick fights instead of attacking victim.

3:23 AM - 5 Sep 2017 from United States



13



15



26



EXHIBIT U



Jon Del Arroz 🇺🇸 🇵🇷

@jondelarroz

Follow



Am I going to get an apology for you trying to bring my family into an internet fight over some random sperg attacking me @katanapen?

1:52 AM - 6 Sep 2017 from [United States](#)

EXHIBIT V

How To Lose A Guy In Any One Of 10 Questions

Posted on [December 12, 2017](#)

Share this post

[Everyday Feminism](#) published an article on [10 Things Every Intersectional Feminist should ask on a first date](#)... immediately, you know that if any guy was asked any one of these questions, they should high-tail it out of there before they get falsely accused of a crime.

I'll note all of the questions don't actually have anything to do with the feminism, whatever that is, at this point, but signalling generic SJW topics.

But I'll also note the author starts it out: "as a queer femme..." Interesting that these women are publishing and taking advice on dating men from someone who doesn't even know about the topic.

I did a poll and my readers wanted me to answer these questions for them. The questions are painful enough to read on their own, so let's go through these as a straight, normal alpha male who these feminists would never even have ask them on a date (which is why they're so bitter):

1. **Do You Believe Black Lives Matter?** Is a terrorist group.
2. **What are your thoughts on gender and sexual orientation?** I'm not gonna be a jerk to someone I see on the street, cuz you shouldn't just treat people badly, but there are healthy ways of living and there are unhealthy ways of living. Society shouldn't encourage the unhealthy.
3. **How do you work to dismantle sexism and misogyny in your life?** By patrolling thots.
4. **What are your thoughts on sex work?** It's degenerate and destroys relationships. Our society needs to stop getting loose about this and purge it.

5. **Are you a supporter of the BDS movement?** What's interesting is these SJW types are very anti-Semitic while they accuse everyone else of being so.
6. **What is your understanding of settler colonialism and indigenous rights?** America won. Get over it.
7. **Do you think capitalism is exploitative?** If you are a Honduran flower farmer and you pick a flower and I pay you 50 cents to buy it. You are better off than if I hadn't.
8. **Can Any Human Be Illegal?** They have to go back.
9. **Do you support Muslim Americans and non-Muslim people from Islamic countries?** I support their forceable conversion to Christianity.
10. **Does your allyship include disabled folks?** I don't even understand what this means. Does that mean most feminists pick on disabled people? Cuz it seems to imply that.

And there we go. Let my couple of trolls who like to come and leave angry comments enjoy this thread today. lol

For everyone else, go [support my Patreon](#). It's how I can get you great content every day, and produce even more. My first short story, "Darkness", is up on the site now and readers are loving it!

SHARE THIS:



RELATED

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February 14, 2018
In "Writing"

[Someone Tried To Get Me Kicked Out Of A Sci-Fi Convention... And You'll Never Believe What Happened Next!](#)
March 12, 2018
In "Culture Wars"

[Writers Beware: Wisconsin Has Gone Full Crazy](#)
May 29, 2018
In "The"

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This entry was posted in [Uncategorized](#) by [otomo](#). Bookmark the [permalink](#) [<http://delarroz.com/2017/12/12/how-to-lose-a-guy-in-any-one-of-10-questions/>]

13 THOUGHTS ON "HOW TO LOSE A GUY IN ANY ONE OF 10 QUESTIONS"



Vaughn Treude

on **December 12, 2017 at 10:26 am** said:

I'd be out of there when I heard the word "intersectional."



Polly Valent

on **December 12, 2017 at 11:31 am** said:

Okay, I'll take a stab at these and see if my perspective as a woman helps make sense of them.

1. I'll do you one better and say that the ones in utero do as well.
2. That it is positively the last thing I want anyone's personal details on, thanks.
3. By demonstrating brain use.
4. Dangerous for all involved, in various physical, mental, emotional, and spiritual ways. Also, see answer 2.
5. Did you know that most people reduce "movements" to acronyms so that they can have a verbal shorthand to signal that they are in the "in group" without actually understanding the tenets of the "movement" they are referencing?
6. I do prefer the ones that end up not practicing ritual human sacrifice or throwing undesirables off buildings.
7. When it involves buying cheap goods from sweatshops in communist countries, sure. But without looping in communist practices, the market tends to correct the exploitative elements, as workers and consumers alike have mobility and choice.
8. Can any human be unwanted enough to deserve to die before it ever draws breath, much less break laws?
9. Honey, you're going to have to define "support." It had better not involve paying a religious tax for being non-Muslim.
10. Why are you making up words? Do you seriously believe you've invented the concepts of kindness and fairness to human beings – whose worth is not predicated on their abilities but whose abilities may be limited – or are you talking about something else that needs a new word?

Hm. No, I think the basic underlying philosophy and worldview behind these questions needs more work. Starting with “is human life valuable? Every human? Why?” and going on from there.



Matt B

on [December 12, 2017 at 12:00 pm](#) said:

I was good right up to the “forceable conversion to Christianity” bit. As a young Jewish kid growing up in the '60's I had plenty of people try to force Christianity on me. I often got hurt over it. They got to feel the pain as well. These days, nobody has been stupid enough to try for many years. I'm not a fan of Islam. I have met Muslims I like. Otherwise? Who would want to deal with that woman? Most of those questions would be disqualifiers. Hell, support BDS? Only until the slipknot was in place. Then the long drop.



Rob

on [December 12, 2017 at 2:08 pm](#) said:

I wonder how I'd stack up on a first date with this wonderfully open-minded feminist?

1. BLM – is that a hip-hop group?
2. Gender is something they taught us about in English class. Sexual orientation? I have eyeballs – I can SEE the pretty girls, I don't need a compass to point them out.
3. How do I dismantle sexism? By not hanging out with feminists or voting for man-hating politicians.
4. When sex becomes work, it's no longer fun. And some women are awfully hard to . . . never mind.
5. Bowels Discharged Successfully? Bowel movements are unpleasant but necessary.
6. I'm an indigenous USAer. My British ancestors have lived on this land for four hundred years and my redskin ancestors for thousands of years, so kiss it lady! (This one is a contradiction – she said that she hates dead white people for settling in North America but then believes that the whole planet belongs to everybody to settle where ever they want. Which is it? Also, the bulk of those

hated white Brits came over in slave ships themselves, and I have documentation for one of my 17th-cent ancestors who was a white slave girl.)

7. Until I can swing through the trees like Tarzan, kill a full-grown lioness with my bare hands, and snatch a hot 20-year-old blond off the jungle floor and carry her back to my lair, I guess I'll stick with capitalism.

8. Illegal humans? We got kicked out of the Garden of Eden, never to return, unless we can fight cherubims and the flaming sword.

9. This is a trick question right? In 3 she opposes the rape culture, so is she for it or against it? I've read the Koran, and it says you can rape your slave girl – at least you can have sex with her, apparently without her consent. I guess the feminist lady supports rape culture after all.

10. I guess my allyship includes disabled people, if it has a wheelchair ramp. How big is an allyship anyway? Bigger than a canoe, smaller than Harvey Weinstein's pleasure barge?

This woman is way too loony-tunes for me. She is nuts. A bundle of leftist-feminist contradictions. My questions for her would be something like how many Birkenstocks have been under your bed, baby, and what kind of psychotropes are you on? You know what, don't answer those. See ya!



Ryan
on [December 12, 2017 at 3:14 pm](#) said:

“so let's go through these as a straight, normal alpha male ”

LOL. Beta, at best, maybe...



otomo
on [December 12, 2017 at 6:28 pm](#) said:

You jelly homie!



Ryan
on [December 12, 2017 at 6:48 pm](#) said:

Alpha wouldn't have responded.,,



Sean

on **December 13, 2017 at 8:11 am** said:

And only a gamma would have poked...

**Nissa Annakindt**on **December 12, 2017 at 8:09 pm** said:

Simple rule. Whether you are a man or woman or undecided, never date a feminist, intersectional (intersexual?) or not.



James Palmer

on **December 13, 2017 at 6:59 am** said:

And this is why you're single.



Kevin j Waldron

on **December 13, 2017 at 3:48 pm** said:

Are you a supporter of the BDS movement? yes you can be my sex slave. You now call me master now lol

<https://en.m.wikipedia.org/wiki/BDSM>



Jan Schroeder

on **December 15, 2017 at 3:06 am** said:

" I support their forceable conversion to Christianity."

Yeah, I've heard that'd the best way to get the most devoted followers – threaten them.

Pretty sure Jesus would be ashamed of you for that statment. I know I am. I used to think that even though I disagreed with you that you walked the walk. This shows how wrong I was.



Kevin j Waldron
on **December 16, 2017 at 12:10 am** said:

Do it it's a joke wow lol

EXHIBIT W



Dragon Energy Jon Del Arroz

@jondelarroz

Blocked



Replying to @vfm_5411 @sfga

I'm excited to go to their con suite at WorldCon!

12:41 AM - 20 Dec 2017



Dragon Energy Jon Del Arroz

@jondelarroz

Blocked



Replying to @jondelarroz @vfm_5411 @sfga

I will be recording with a bodycam for anyone who is thinking of hijinx :)

12:41 AM - 20 Dec 2017

EXHIBIT X



Jon Del Arroz



11 hrs ·

In 40 years, Racist will be the new N-Word.

Except only white people (who will be minorities in America) will be allowed to say it to each other. They'll have to drop the t though to keep it real.

"Wazzap, my racis?"

56

6 Comments 3 Shares

Like

Comment

Share



That LAtinX Sci-Fi Writer
@jondelarroz



She has to go back.



8:49 PM · Aug 24, 2019 · [Twitter for iPhone](#)





That LΔtinX Sci-Fi Writer

@jondelarroz



Also the media has conditioned white people to be scared of being called racist.

Notice no other color of people worries about this ever.

4:02 PM · Aug 25, 2019 · [Twitter Web App](#)

EXHIBIT Y



Jon Del Arroz 🍷 Herpaderp whine alt right reeeeeee. Go to portland and throw concrete milkshakes on right wingers while reading your Heather Antos Valiant books (while constantly complainin'g a bout them) and sipping a soy latte, loser.

The rest of us are gonna read great comics by right wingers.

Like · Reply · 3m · Edited



Jon Del Arroz 🍷 Imagine if these assholes spent half as much time protesting and talking about how they'd never by Marvel again (and not buying marvel nor reading it) as they do pretending they're being virtuous by not reading Chuck Dixon's book. We might actually get somewhere.

Instead they just slurp up their Half-Black Gay Transgender Spider-Jizz from Disney and take it.

Like · Reply · 1m · Edited



Jon Del Arroz 🍷 Sorry if you're offended by my mean words. I could care less though. I hate the left. You ruin everything.

Like · Reply · 1m

EXHIBIT Z



Jon "Delivers On Time" Del Arroz

@jondelarroz



I set aside time to troll SJWs.

It's important to make them wail and gnash teeth like they did on that fateful day in November of 2016.

EXHIBIT "F"

Peter Sean Bradley, Esq. SBN 109258
7045 North Fruit Avenue
Fresno, California 93711
Telephone No.: (559) 431-3142
Facsimile No.: (559) 436-1135

Attorney for Plaintiff,
Jonathan Del Arroz

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA**

JONATHAN DEL ARROZ,
Plaintiff,

v.

SAN FRANCISCO SCIENCE FICTION
CONVENTIONS, INC. ("SFSFC") aka
"WORLDCON76" David W. Gallaher (2019),
President; David W. Clark (2020), Vice
President; Lise Detusch Harrigan (2020),
Treasurer; Kevin Standlee (2018), Secretary;
Sandra Childress (2019); Bruce Farr (2018),
Chair; 2018 SMOF Con Committee; Cheryl
Morgan (2020); Kevin Roche (2018), Chair;
2018 Worldcon (Worldcon 76) Committee;
Cindy Scott (2018); Randy Smith (2019),
Chair; New Zealand 2020 Worldcon Agent
Committee; Andy Trembley (2020); Jennifer
"Radar" Wylie (2019), Chair; CostumeCon
2021 Organizing Committee; Lori
Buschhaum; Susie Rodriguez and DOES 1
through 30, inclusive.,

Defendant.

Case No.: 18-CV-33547

**RESPONSES TO REQUEST FOR
ADMISSIONS, SET
NO. 2**

PROPOUNDING PARTY : Defendant SAN FRANCISCO SCIENCE FICTION
CONVENTIONS, INC. ("SFSFC")

RESPONDING PARTY : Plaintiff JONATHAN DEL ARROZ

SET NUMBER : TWO

Response to Request for Admission No. 1:

Admit.

Response to Request for Admission No. 2:

Admit.

Response to Request for Admission No. 3:

Admit.

Response to Request for Admission No. 4:

Respondent objects to this request on the grounds that harassment is vague and ambiguous. Respondent admits that he believed that “harassment” reasonably defined in the Code of Conduct involving physical harassment at the Worldcon 76 would violate the Code of Conduct.

Response to Request for Admission No. 7:

Respondent admits that those words were expressed on the document called Code of Conduct.

Response to Request for Admission No. 8:

Respondent admits that those words are stated in the Code of Conduct after an admonition to treat other people as you would want others to treat your sister or brother.

Request for Admission No. 11:

Admit that your Twitter username is @jondelarroz.

Request for Admission No. 11:

Admit.

Response to Request for Admission No. 12:

Respondent admits that after WorldCon 76, Twitter suspended his account on the pretextual and inconsistently grounds that one post in a civil discussion about gender identity was “hateful” because of the views expressed.

Response to Request for Admission No. 13:

Respondent admits that the term “The Leading Hispanic Voice in Science Fiction” has been used by both Respondent and many science fiction fans.

Response to Request for Admission No. 14:

Respondent objects to the term “fair representation as being vague and ambiguous.” Respondent admits that Exhibit B is an accurate copy of the title banner from his Twitter page for some time in 2018.

Response to Request for Admission No. 15:

Respondent objects to the term “fair representation as being vague and ambiguous.” Respondent admits that Exhibit C is an accurate copy of a Respondent’s “Bio” page from his website.

Response to Request for Admission No. 16:

Admit.

Response to Request for Admission No. 17:

Admit.

Response to Request for Admission No. 18:

Admit.

Response to Request for Admission No. 19:

Admit.

Response to Request for Admission No. 20:

Admit.

Response to Request for Admission No. 21:

Admit.

Response to Request for Admission No. 22:

Admit.

Response to Request for Admission No. 23:

Admit.

Response to Request for Admission No. 24:

Admit.

Response to Request for Admission No. 25:

Admit.

Response to Request for Admission No. 26:

Admit.

Response to Request for Admission No. 27:

Objection, the request is vague and ambiguous as to the term “response to.” Without waiving, deny.

Response to Request for Admission No. 28:

Admit.

Response to Request for Admission No. 29:

Objection, the request is vague and ambiguous as to the term “response to.” Without waiving, deny.

Response to Request for Admission No. 30:

Admit.

Response to Request for Admission No. 31:

Admit.

Response to Request for Admission No. 32:

Objection, the request is vague and ambiguous as to the term “response to.” Without waiving, admit.

Response to Request for Admission No. 33:

Admit.

Response to Request for Admission No. 34:

Admit.

Response to Request for Admission No. 35:

Admit.

Response to Request for Admission No. 36:

Admit.

Response to Request for Admission No. 37:

Admit.

Response to Request for Admission No. 38:

Admit.

Response to Request for Admission No. 39:

Admit.

Response to Request for Admission No. 40:

Admit.

1 **Response to Request for Admission No. 41:**

2 Admit.

3
4 Dated: April 27, 2020

Peter Sean Bradley, Esq.

5
6 By: Peter Sean Bradley
7 Peter Sean Bradley
8 Attorney for Plaintiff
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VERIFICATION

I, Jonathan Del Arroz, am the plaintiff in in the above-entitled action. I have read the foregoing responses contained in the Responses to Request for Admissions, Set Number 2, which are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this verification was executed in Danville _____, CA _____.

Dated: 4/27/20

Signed: *Jon Del Arroz*

Name: Jonathan Del Arroz

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF Santa Clara STREET ADDRESS: 191 N. 1st St., MAILING ADDRESS: CITY AND ZIP CODE: San Jose CA 95113 BRANCH NAME: San Jose Courthouse	
PLAINTIFF/PETITIONER: Jonathan Del Arroz DEFENDANT/RESPONDENT: San Francisco Science Fiction Conventions, Inc.	CASE NUMBER: 18-CV-334547 JUDICIAL OFFICER:
PROOF OF ELECTRONIC SERVICE	DEPARTMENT:

1. I am at least 18 years old.

a. My residence or business address is (*specify*):
7045 N. Fruit, Fresno CA 93711

b. My electronic service address is (*specify*):
petersean@aol.com

2. I electronically served the following documents (*exact titles*):

Response to Request for Admission, Set 2

☐ The documents served are listed in an attachment. (*Form POS-050(D)/EFS-050(D) may be used for this purpose.*)

3. I electronically served the documents listed in 2 as follows:

a. Name of person served: Ann P. Nguen/Lindsey Pho/Messner Reeves LLP
 On behalf of (*name or names of parties represented, if person served is an attorney*):
 San Francisco Science Fiction Conventions, Inc.

b. Electronic service address of person served :
anguyen@messner.com, lpho@messner.com

c. On (*date*): April 27, 2020

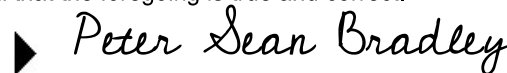
☐ The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment.
 (*Form POS-050(P)/EFS-050(P) may be used for this purpose.*)

Date: April 27, 2020

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

Peter Sean Bradley

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

EXHIBIT "G"

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

JONATHAN DEL ARROZ,

Plaintiff,

vs.

CASE NO. 18-CV-33547

SAN FRANCISCO SCIENCE FICTION
CONVENTIONS, INC. ("SFSFC")
aka WORLDCON76, et al.,

Defendants.

_____/

REMOTE DEPOSITION OF
JONATHAN DEL ARROZ

DATE: January 13, 2021
TIME: 10:01 a.m.
LOCATION: via videoconference

REPORTED BY: BENJAMIN GERALD
California CSR No. 14203
Washington CSR No. 3468

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I N D E X

EXAMINATION BY MS. NGUYEN

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1 A. University of California at Berkeley.

2 Q. When did you graduate from Berkeley?

3 A. 2006.

4 Q. What degree do you have from Berkeley?

5 A. A bachelor's in business administration.

6 Q. Do you have any other degree besides that?

7 A. No.

8 Q. Do you have a real estate license?

9 A. No.

10 Q. Do you have any other professional licenses?

11 A. No.

12 Q. Mr. Del Arroz, you have a website under your
13 last name, delzrroz.com, correct?

14 A. Yes.

15 Q. When was that website set up?

16 A. The current iteration was set up six months
17 ago, but originally, when I built it myself, I think
18 2014.

19 Q. So you got the domain name in 2014?

20 A. I believe so.

21 Q. Okay. And you set it up then?

22 A. Yes.

23 Q. Sorry. That was just delivery man at the door.

24 And you said the current iteration was set up
25 six months ago?

1 Q. Spell that for me, please.

2 A. W-O-R-L-D, A-N-V-I-L.

3 Q. One word?

4 A. Two words.

5 Q. Okay. And when was rislandia.com set up?

6 A. 2018.

7 Q. What's the difference between the delzrroz.com
8 and the rislandia.com?

9 A. Rislandia.com is just my -- one of my science
10 fiction worlds, and I just have all the information of
11 the various characters and settings and all that for my
12 readers to enjoy.

13 Q. And what do you use delzrroz.com for?

14 A. I use it to direct people to my newsletter for
15 marketing, and I've got direct book link pages for
16 marketing, and I've got a blog, so it generates traffic
17 for that purpose.

18 Q. And is it marketing also for your science
19 fiction books?

20 A. Yes. Pretty much only for my science fiction
21 books.

22 Q. Do you have any other website?

23 A. No.

24 Q. So I notice on your website, on the
25 delzrroz.com website, you represented yourself to be a

1 number one Amazon best selling author; what's the basis
2 of that?

3 A. Amazon, when you're the top book in one of the
4 categories, will give you a little orange tag on the
5 book that says "number one best seller," and it will
6 list you as the top of their list in that category. So
7 I've been number one best seller in young adult
8 steampunk, in Christian science fiction, in steampunk
9 graphic novels, in short stories and anthologies,
10 science fiction, and I believe there was one other, by I
11 stopped tracking it at some point, so I don't remember.

12 Q. So I have young author --

13 A. Young adult.

14 Q. Oh, young adult steampunk, and then Christian
15 science fiction.

16 A. Uh-huh.

17 Q. What was the third?

18 A. Steampunk comics and graphic novels.

19 Q. And the further?

20 A. Science fiction short stores and anthologies.

21 Q. Any more?

22 A. I believe I had one more, but I don't remember,
23 so I stopped tracking it.

24 Q. Is that noted on Amazon's website somewhere?

25 A. No. It's noted while you have -- while you are

1 THE WITNESS: Right.

2 BY MS. NGUYEN:

3 Q. Okay. On your website, I think you also
4 represent yourself to be the leading Hispanic voice in
5 science fiction.

6 How did you come about having that recognition?

7 A. I made it up because it sounded good.

8 Q. Have you been acknowledged or recognized as
9 such by any -- anyone else?

10 A. Yes. In fact, a lot of other authors recognize
11 me as that by this point, and I've also been recognized
12 by the news website PJ Media as such.

13 Q. But it started with you representing yourself
14 as such first?

15 A. Correct.

16 Q. All right. When did you first start using that
17 designation?

18 A. Middle of 2017.

19 Q. And when -- when were you recognized by
20 PJ Media as such?

21 A. Middle of 2018.

22 Q. And what is PJ Media?

23 A. PJ Media is a conservative news website.

24 Q. Online only?

25 A. Yes. They're owned by Townhall, I believe.

1 Q. And how did you get that recognition by
2 PJ Media?

3 A. I was interviewed in conjunction to some work I
4 was doing in comic books because there was a movement
5 being formed at the time of conservative comic book
6 creators and several of us were getting blacklisted by
7 the industry because of our political affiliations, and
8 I broke a story which actually outlined the political
9 affiliations of every writer at Marvel Comics, and I
10 determined that every writer at Marvel Comics was openly
11 hostile towards Christians and conservatives, and I
12 published that article in The Federalist, which was
13 another conservative news website at the time, and that
14 garnered me a pretty substantive following.

15 Q. What was the name of the article that you got
16 published in The Federalist?

17 A. It was called Forcing Political Correctness on
18 Employees is Killing Marvel Comics.

19 Q. And when was that published in The Federalist?

20 A. Gosh. I think April 2017. So after --
21 after -- after Worldcon's banning of me.

22 Q. When were you interviewed by PJ Media?

23 A. I've been interviewed by PJ Media multiple
24 times, so it's -- I don't have a clear date, but
25 sometime --

1 Q. When were you first -- sorry.

2 When were you first interviewed by them?

3 A. I believe 2018. Oh, no. That's incorrect. I
4 was first interviewed by PJ Media because Worldcon --
5 because of Worldcon's banning and the libel claim I'm
6 making in 2017.

7 Q. So was that before or after the publication of
8 your article in The Federalist?

9 A. Before.

10 Q. So early in 2017?

11 A. Yes.

12 Q. And then you were interviewed by them for the
13 article in The Federalist as well?

14 A. Not the article in The Federalist, but because
15 I -- that -- that article made me somewhat of a cultural
16 authority on the comic industry, so later on, they
17 interviewed me about a different -- am I getting my
18 timing wrong? Wait a minute.

19 So Worldcon banned me -- was it 2018 or 2017?

20 Q. I believe it was January of 2018.

21 A. Okay. So the timing would have been 2018, not
22 2017. Sorry.

23 Q. Because the convention was in August of 2018.

24 A. Right. That makes sense. Okay.

25 So all this was happening -- wait a minute.

1 No, no, no. The Federalist article happened in
2 2017. So the comic thing happened before the banning.
3 So I was interviewed in PJ Media before the banning. So
4 it was -- it was middle of 2017 in conjunction -- there
5 was a conservative YouTube reviewer who reviews comic
6 books, his name is Richard C. Meyer, and he was being
7 threatened at the New York Comic Con. They were -- they
8 were trying to -- he's a military veteran, and they --
9 comic professionals were conspiring in a Facebook group
10 about how they wanted to, quote -- and they said this --
11 "trigger his PTSD and goad him into throwing a punch so
12 that he would enact violence and therefore be banned
13 from conventions forever."

14 So yeah. My first interview with PJ Media was
15 about that and about these industry professionals
16 attempting to -- to harm somebody's career by banning
17 them from conventions, so that was in 2017.

18 Q. Do you remember the month in 2017 that you were
19 first interviewed by PJ Media?

20 A. Yeah, it was either August or September.

21 Q. And do you recall that your article was
22 published in The Federalist in April 2017 --

23 A. Yes.

24 Q. -- so before the interview?

25 A. Before that, uh-huh.

1 Q. Okay. And how many times have you been
2 published in The Federalist?

3 A. My gosh. I think 12? More than 10 is a better
4 way to --

5 Q. With the first being the April 2017 article?

6 A. Yes.

7 Q. Are you still a contributor to The Federalist
8 now?

9 A. No. I stopped because I -- I noticed that it
10 didn't really help in selling science fiction books.

11 Q. When did you stop?

12 A. I believe my last article was early 2019.

13 Q. So would it be fair to say that the primary
14 purpose of your being a contributor to The Federalist
15 was to -- to help with the sales of your books?

16 A. Yes. I wanted to try to boost my profile.
17 Right.

18 Q. Do you know how many times you've been
19 interviewed by PJ Media?

20 A. Three. Four, maybe.

21 Q. When was the last time?

22 A. I believe in 2019, and I believe it was in an
23 article regarding the singer Taylor Swift.

24 Q. And who else besides PJ Media has recognized
25 you as the leading Hispanic voice in science fiction?

1 A. Just various people on social media. I don't
2 know exact -- no -- nothing precise comes to mind.

3 Q. Do you have a fan club?

4 A. No. I'd like -- I'd like to, though. Sounds
5 fun.

6 Q. And I think you also have on your website that
7 you're the winner of the 2018 CLFA book-of-the year
8 award.

9 A. Yes.

10 Q. Tell me about that please.

11 A. It's a group called the Conservative
12 Libertarian Fiction Alliance, and I think there's been
13 2- or 300 members active, and it's just a social media
14 group of like-minded science fiction -- and actually all
15 genre's of fiction writing.

16 Q. How did you get picked as the winner in 2018?

17 A. I campaigned pretty hard for it. I've become
18 friends with a lot of members over the years, and I
19 asked members for support for my book For Steam and
20 Country, and a lot of those people did read it and
21 enjoyed it.

22 Q. Who got to vote for it?

23 A. Members of the Conservative Libertarian Fiction
24 Alliance, so...

25 Q. Do you know how many members there were in

1 have time.

2 Q. Do you know how many -- what do you call
3 them -- subscribers or followers this website has?

4 A. Arkhaven? No, I don't have any information on
5 that.

6 Q. And when you write for them, is it also to get
7 your name out there and generate more book sales?

8 A. Yes.

9 Q. And have you seen it working?

10 A. Not yet, but I've only been writing there for
11 about a month.

12 Q. Okay. So you've only been doing it for a
13 month, once a week?

14 A. Yeah.

15 Q. So four blogs or so?

16 A. Around that, yeah. I'm hoping that a focus on
17 comic readers there will help more than a focus on
18 people who don't actually read the genre.

19 Q. So you said this was more recently, but in the
20 past have you had your writings published or articles
21 published in any other publication besides
22 The Federalist?

23 A. Yes. I worked for a company called
24 comicrelated.com. I don't think they're -- I don't
25 think the site's around anymore. It went bust.

1 Q. What is it called?

2 A. Comic Related. And I did reviews of comic
3 books for them.

4 Q. And during which period of time did you do
5 that?

6 A. 2015 to 2017.

7 Q. Why did you stop?

8 A. Their website went out of -- or was going out
9 of business, so...

10 Q. And where -- was your effort for
11 comicrelated.com also to help generate for sales for
12 your books?

13 A. Yes.

14 Q. Was it successful?

15 A. It depends on what your definition of
16 "successful" is.

17 Q. Did you see any returns from your efforts?

18 A. Yeah, I got a couple sales here and there.

19 Q. If they had not gone out of business, would you
20 have continued in that effort?

21 A. Maybe. I don't know. That's speculation, I
22 guess.

23 Q. We don't want you to speculate.

24 Have you lobbied to try to get the CLFA
25 book-of-the-year award for subsequent years like 2019,

1 2020?

2 A. Yeah. I was nominated in 2019, but I had -- I
3 had a friend who I thought wrote a better book that
4 year, so I lobbied for his book instead, once it came
5 down to it.

6 Q. That was nice.

7 A. I think I got into the finalist stage. And
8 then 2020 hasn't happened yet.

9 Q. Okay. And on your website, you present
10 yourself to be recognized as a popular journalist and/or
11 cultural comment ator. The popular journalist
12 designation, is that based on your publication with
13 The Federalist?

14 A. Yes.

15 Q. Based on anything else?

16 A. No. I guess my blog, yeah.

17 Q. Your blog on Arkhaven?

18 A. On my -- on my website.

19 Q. Okay. And on your website, how often do you
20 publish a blog? I mean a posting.

21 A. I make a post every day, and then I have my
22 YouTube videos which I do, which I started doing twice a
23 day, I think mid last year, automatically post there
24 also. So it ends up as three posts a day; two videos
25 and one piece of writing.

1 Q. When did you start blogging on a daily basis?

2 A. When I came out with my first book in 2016.

3 Q. How do you find topics to blog on?

4 A. That is really hard, and some days I don't find
5 them really well. So I try to see what's going on that
6 day or what interests me. I'm very interested in a
7 Star Trek role playing game right now, so I may make
8 some posts about that. If I'm passionate about
9 something, I think it comes across better to the
10 readers.

11 Q. What about your YouTube videos? When did you
12 start doing that?

13 A. I started taking it seriously mid last year. A
14 lot of my friends were getting a lot bigger success than
15 I was in the comic book industry based on their YouTube
16 content, and so I'm a little late to the party. They'd
17 been doing it for two/three years and saw just huge
18 growth in sales, and so I started mid last year taking
19 it seriously.

20 Q. When did you first start, though?

21 A. Oh, gosh. Probably, I think I opened my
22 channel in 2016, and it got monetized for the first time
23 last year, so -- YouTube has a threshold amount for
24 monetization, so...

25 Q. What is that threshold?

1 A. One thousand subscribers.

2 Q. So you reached the one how subscriber level as
3 of 2020?

4 A. Correct.

5 Q. Which month?

6 A. I think it was February -- no, maybe March.

7 Q. Just as everybody was shut in and is now online
8 all the time.

9 A. Yeah. Exactly. People started tuning in
10 because there was nothing else to do. It was huge
11 growth. I think I only had 200 subscribers before that,
12 and it just exploded really fast.

13 Q. Did you have to do anything to increase the
14 number of subscribers on your YouTube channel?

15 A. I would post to Twitter, Facebook, Reddit, you
16 know, any site I could find where they would let me post
17 my link, basically, to try to get people subscribing,
18 and I started upping my content at that point to make
19 two videos per day. So regular content, and then, you
20 know, a heavy, heavy focus on work promotion, yes.

21 Q. And once you reach the 1,000-subscriber level,
22 what kind of compensation do you get?

23 A. It's about fifty to a hundred dollars a month
24 now.

25 Q. And what is that based on?

1 It looks like it's more like 40,000 views, but yes.

2 Q. If you check, are you able to tell how many
3 views you have per year?

4 A. I believe so.

5 Q. Do you know how many views you had in 2020?

6 A. No, I -- I'd have to go figure out how to look
7 at that.

8 Q. So in 2017, were you also posting on your
9 YouTube channel about twice a day?

10 A. No. I would do YouTube very sporadically at
11 that point. I didn't view it as a -- I didn't view it
12 as a serious marketing tool in 2017. It took me until
13 last year to understand that I missed there.

14 Q. So in 2017/2018, how often were you posting
15 something to your YouTube channel?

16 A. Maybe once every week or two.

17 Q. And your designation as a cultural commentator,
18 is that something you came up with?

19 A. Yes.

20 Q. And have you been recognized as such by anyone
21 else?

22 A. I -- I believe that the -- the interviews of me
23 in places like PJ Media are because I'm recognized as
24 that. It's an inference, right?

25 Q. Besides PJ Media, have you been interviewed by

1 any other publication, channels, any other entities?

2 A. Yeah. I was interviewed by the Wall Street
3 Journal last week.

4 Q. On what?

5 A. On the subject of cancel culture, because
6 that's kind of my expertise, starting with Worldcon.

7 Q. How did you get that expertise?

8 A. By -- by Worldcon canceling me.

9 Q. I'm not sure I understand. What do you mean by
10 you getting that expertise by Worldcon canceling you?

11 A. Cancel culture is -- is when people generate a
12 web or social media outrage about someone in order to
13 try to get them fired or destroy them, and this happens
14 a lot in the author community and in the comic book
15 community, and in fact, I'd say all communities at this
16 point, and the most recent one is an example that can be
17 innocuous, but the mob just kind of makes up things
18 about people and tries to ruin their lives.

19 And what I was interviewed about last week was
20 this woman, Jessica Cluess, who's an author. I mean, I
21 had never heard of her before. She's not any sort of
22 public figure or anything like that, but she was
23 advocating for reading the book the Scarlet Letter, and
24 someone made a commentary about the Scarlet Letter
25 which, you know, didn't make sense in terms of what the

1 I comment a lot on sort of the failings of
2 DC Comics or Marvel Comics because they're -- they're
3 the most prominent comic book publishers. Like
4 yesterday, for example, yesterday I made one because
5 DC Comics are having a lot of problems keeping their
6 books in print. So there are a lot of Batman books that
7 people are very interested in, for example, which are
8 getting exorbitant prices because they won't print
9 enough in their print run, or they don't print enough
10 books.

11 So I try to stick to matters in the realm of
12 science fiction or comic books.

13 Q. How many books have you written?

14 A. Sixteen.

15 Q. Have they all been published?

16 A. I think I have 13.

17 Q. So three not yet published, or not going to
18 be --

19 A. Correct.

20 Q. -- published?

21 A. Not yet published.

22 Q. And who's the publisher for the 13 already
23 published?

24 A. The first book was done by a company called
25 Evil Girlfriend Media --

1 Q. Okay. How about --

2 A. -- who was --

3 Q. -- I'm sorry to interrupt. Just to make it
4 more organized, clean, can you just name for me the
5 13 books that have been published?

6 A. Star Realms Rescue Run, The Stars Entwined, The
7 Stars Asunder, Colony Launch, Justified, Sanctified,
8 Glorified, For Steam and Country, The Blood of Giants,
9 The Fight for Rislandia, The Iron Wedding, The Steam
10 Night, and Make Science Fiction Fun Again.

11 Q. When was the first book that you published?

12 A. November 2016. That was -- that was not my --
13 that somebody else published -- because they published
14 it.

15 Q. I'm sorry. The first of your books, that was
16 published was in November 2016?

17 A. Correct.

18 Q. Which book was that?

19 A. Star Realms Rescue Run.

20 Q. And how many books did you publish in 2016?

21 A. One.

22 Q. And how many books did you get published in
23 2017?

24 A. Two.

25 Q. What about 2018?

1 Q. So just looking at this document now, is it
2 your testimony that you don't remember, in December of
3 2017, whether this post was in reference to Worldcon
4 2018 or 2019?

5 A. I believe it is 2018, probably.

6 Q. Okay. So that's the one that was in San Jose,
7 correct?

8 A. Yes.

9 Q. And by then, have you registered to go to the
10 Worldcon in San Jose?

11 A. I don't recall what day it was. I -- I don't
12 even -- I don't remember when I registered, so...

13 Q. But at that time, you were intending to go,
14 correct?

15 A. Correct.

16 Q. And your reference there to "con suite," what
17 is that?

18 A. So I'd been to Worldcons before. In 2006, I
19 went to one in Anaheim, and there -- again, I'll state
20 that there were -- there was no issues there. I met all
21 my favorite authors there. It was a beautiful thing. I
22 was a fan, not a writer at the time. And at night,
23 there are parties that go on in different suites at the
24 hotels usually, and there's, like, a whole circuit you
25 get to go to, say hi to people, meet new people, and

1 just enjoy people's company and all that, and there's
2 lots of different suites that are sponsored by different
3 people.

4 So, say if I want to get a suite and promote my
5 books or whatever, which I have done at conventions
6 before and would be something I possibly have been
7 interested in doing at Worldcon 2018 also, I'd open it
8 up. I'd, you know, bring some snacks, and drinks, and
9 things like that. Set it up, maybe some flyers for my
10 deal, so people could come in and out and enjoy
11 themselves for such a thing.

12 So in this reference, I was likely talking
13 about one of the con suites at the -- at the -- during
14 the parties that go on at Worldcon in the evening, so...

15 Q. You said that the went to the Worldcon in
16 Anaheim.

17 Was that 2006 or 2016?

18 A. '6.

19 Q. Okay. Have you been to any other Worldcons?

20 A. That's the only one I've been to, so...

21 Q. Okay. Did you go to the one in Ireland?

22 A. No. It didn't -- we couldn't afford it at the
23 time, unfortunately, because it's a long flight.

24 Q. So for the -- the suites there, are those all
25 parties at night?

1 Q. Okay. And then the second post that you have
2 on there states that, "I will be recording with a body
3 cam for anyone who is thinking of hijinks."

4 What is "hijinks"?

5 A. Hijinks, in this reference, is somebody trying
6 to -- to cause an issue with me. I referenced earlier
7 in the deposition a group that was trying to harass
8 and -- and -- and you know, wrongfully accuse of a crime
9 even, Richard C. Meyer, at another convention.

10 I had reason to believe at this time that there
11 were people who would do similar to me or might even do
12 violence to me, because I had been receiving death
13 threats from people in the comic book and science
14 fiction community from around -- gosh, August until that
15 point.

16 There were a few different frightening
17 instances, like somebody sent a package to my house,
18 which -- I didn't know what it was. It had no address
19 or anything, and it exploded as I opened it with lewd
20 figures of genitals as confetti. It could have been a
21 bomb, I don't know. And I have little kids, right? So
22 even lewd things like that being sent to me that explode
23 upon trying to open something is just way over the line,
24 and that really, really frightened me.

25 And so you might note that I sent an email to

1 Worldcon asking about what security measures they'd be
2 providing at the time. And they told me -- they -- they
3 didn't reply. I wanted to make sure publicly that
4 people understood that if they were going to try to
5 harass me or hurt me or kill me, who knows, that I would
6 make sure to have a camera on me so I would have
7 evidence of that to deter people from doing that.

8 Q. You said that there were people harassing you
9 or wrongfully accusing you of a crime starting in
10 August.

11 You're talking about August 2017?

12 A. Yeah. Death threats and that package, like I
13 mentioned. The wrongfully accusing of a crime was in
14 reference to Richard C. Meyer at the New York Comic Con.

15 Q. Oh, okay. So it wasn't anyone accusing you of
16 a crime --

17 A. No.

18 Q. -- you were talking about somebody else?

19 A. No. I've never been accused of a crime to my
20 knowledge.

21 Q. So the package that was sent to your home, when
22 did you receive that?

23 A. September 2017, I believe.

24 Q. Do you know who sent it?

25 A. I still don't to this day. I called the

1 was documented conspiracy against him by people in the
2 industry. I even remember their names, a couple of
3 them. It was -- it was -- oh, gosh, what was that guy's
4 name? I don't -- I don't know. That was in the
5 PJ Media article. I can look that up later.

6 Q. And when did this happen to Richard C. Meyer?

7 A. Same time period. It was August 2017. There
8 seemed to be a concerted effort to, you know, harass, I
9 would say, conservative-libertarian-leaning authors and
10 content creators at the time.

11 Q. And what about to Richard C. Meyer?

12 A. He eventually was dropped by his publisher for
13 his book because they deemed him too controversial a
14 figure to want to deal with him at that point, and he's
15 since gone to self-publishing, and to my knowledge, I
16 don't believe he's attended a convention ever again
17 because he's keeping his own safety in mind.

18 Q. But did he go to Worldcon 76 in San Jose?

19 A. No.

20 Q. So did something happen to him at some other
21 Worldcon?

22 A. It was the New York Comic Con.

23 Q. And when was that?

24 A. September of 2017.

25 Q. And was he physically hurt at that convention?

1 please.

2 (Exhibit 2 was marked for identification.)

3 BY MS. NGUYEN:

4 Q. Mr. Del Arroz, I'm going to ask you to open
5 Exhibit 2, take a look at it, and let me know when
6 you're done so I can start asking my questions.

7 A. Okay.

8 Q. For the record, what I've had marked as
9 Exhibit 2 is a four-page document that looks to be the
10 printout of your registration to Worldcon 76 in
11 San Jose.

12 Do you see that?

13 A. Yup.

14 Q. And this shows that your registration date was
15 Christmas Eve, December 24, 2017.

16 Does that refresh your recollection as to when
17 you registered?

18 A. I -- I would presume that's when I registered.
19 That sounds good.

20 Q. And do you know how much you paid for the
21 registration?

22 A. It says on here I paid 50 as a -- as a deposit.

23 Q. Have you ever paid the balance?

24 A. No. I was -- I was -- I was banned and
25 Worldcon posted their canceling of me on their website

1 before that could occur. I think it was only a few days
2 later.

3 Q. Did you ever ask for your \$50 back?

4 A. Yes.

5 Q. Did you get it?

6 A. Yes.

7 Q. And on the last page of that document, it
8 states that, "By registering for Worldcon 76 you agree
9 to abide by the rules and policies of the convention."

10 Did you agree to that when you registered for
11 the convention?

12 A. Absolutely. I've never violated any rules for
13 any conventions that I've attended, and I've attended
14 dozens.

15 Q. So you were aware then of the code of conduct
16 for the convention?

17 MR. BRADLEY: Objection. Vague and ambiguous.
18 Overbroad.

19 Counsel, do you mean he was aware that there
20 was such a thing, or of the terms itself?

21 BY MS. NGUYEN:

22 Q. Well, first then, were you aware that the
23 convention had a code of conduct?

24 MR. BRADLEY: And I'm going to object again.
25 Vague as to time.

1 A. I believe that was 2016, in May.

2 Q. Have you ever exchanged texts with anyone from
3 Worldcon 76?

4 A. I -- I don't know. Because their list of
5 people working for Worldcon 76 is so extensive, there
6 are a lot of people involved in that, and there were a
7 lot of -- and a lot of turn over also, so it's possible
8 at some point, but none of the -- none of the head
9 people of the organization.

10 Q. Well, have you ever exchanged texts with anyone
11 with the organization regarding your being banned from
12 attending Worldcon 76?

13 A. Not to my knowledge.

14 Q. And besides saying hi to Kevin at the Hugo
15 event, have you ever had any face-to-face meeting with
16 anyone else at Worldcon 76?

17 A. I -- I attempted to go to Worldcon anyway,
18 because I was hoping that their -- their sort of, I
19 guess hostility would have settled by that point, and of
20 course I brought, I brought a -- a friend with me,
21 because I was a little -- too afraid to attend alone, so
22 I brought my -- my transgender friend Erin with me, and
23 I went and I tried to sign up on site to go, and I
24 had -- I guess Lori spotted me -- Lori Buschhaum spotted
25 me and then told me to leave, and so I left without

1 incident.

2 Q. Did you record that incident?

3 A. Yes, I did.

4 Q. Did you post that recording?

5 A. Yes, I did. I live streamed it. I live stream
6 for YouTube.

7 Q. Was anyone allowed to buy tickets at the event,
8 or did you have to preregister?

9 A. Yes, people could buy tickets at the event.

10 Q. So that's what you were trying to do, buy
11 tickets at the door?

12 A. Correct.

13 Q. Besides Lori Buschhaum, did you speak with
14 anyone when you went to Worldcon 76 in San Jose?

15 A. No. Only -- only my friend Erin, who came with
16 me. So yeah. I was just -- just -- just making sure I
17 kept to myself, wasn't bothering anybody per their code
18 of conduct, which I was aware of. It didn't seem anyone
19 recognized me from the line at all, and I --- I didn't
20 recognize anybody either. So it would have been a fun,
21 peaceful event where everybody could have fun in science
22 fiction together if they didn't try to push the matter,
23 unfortunately.

24 Q. Which day did you go?

25 A. I believe it was the Friday of the convention.

1 A. Sounds good.

2 Q. Thank you. And Mr. Del Arroz, do you know who
3 Shirley Alford is?

4 A. I have no clue who that is.

5 Q. Okay. So I'm looking at Exhibit 8, which is
6 that screenshot that you attached to an email that you
7 sent to Worldcon, correct?

8 A. Correct.

9 Q. How was it that you became aware of this
10 posting by Shirley Alford?

11 A. It was on their Facebook, Worldcon 76, which I
12 followed.

13 Q. Okay. So have you had any communication or
14 contact with Ms. Alford?

15 A. Not to my knowledge. I still don't know who
16 this is.

17 Uh oh. Testing? Okay.

18 Q. Earlier, Mr. Del Arroz, you told us about the
19 live streaming you did when you went to Worldcon 76 on
20 Friday of the convention.

21 Do you still have a copy of that live stream on
22 your YouTube channel?

23 A. I don't know if I posted it to my YouTube
24 channel. I did it on Facebook Live. I know that, and I
25 don't know that Facebook -- I don't know how to go back

1 Q. Sorry to do that to you, but I need to make
2 sure the transcript is accurate.

3 A. All good.

4 Q. And then on your YouTube channel, have you
5 deleted anything off of your YouTube channel?

6 A. Yes, but not -- not in conjunction to Worldcon.

7 Q. What have you deleted?

8 A. There were some back-and-forth videos I made
9 where I was in an argument with the comic book artist
10 Ethan Van Sciver, and him and I have resolved our
11 differences, so we've become friends, so I didn't want
12 anything negative about him on my YouTube channel.

13 Q. Have you posted anything regarding Worldcon 76
14 on your YouTube channel?

15 A. Probably.

16 Q. Do you know how many posts you've made on your
17 YouTube channel about the Worldcon 76?

18 A. I don't know off the top of my head. At least
19 a few. I definitely would have mentioned my being
20 banned to my audience, probably a couple times.

21 Q. Have you deleted any of those?

22 A. No.

23 Q. So I'm going to ask that you don't delete those
24 as if I need to get a copy, you'll be able to provide me
25 with a copy, right?

1 A. Of course. And I want people to know what
2 happened at Worldcon 76, because I think it was an
3 atrocity committed by them.

4 Q. Okay. So I think we sent discovery requests.
5 I don't think those were part of the discovery responses
6 that were provided by you, so I'm going to ask that you
7 keep them and not delete them so we can get a copy.

8 A. Okay.

9 Q. Besides the live stream, when you went to
10 Worldcon --

11 MR. BRADLEY: Let me interrupt here for a
12 second before we move off that topic. Firstly, I don't
13 know they've been requested; however, I'm willing to
14 cooperate. So if you can send us a letter and he can
15 get a hold of them, we'll send them.

16 MS. NGUYEN: I appreciate it. We'll follow-up.

17 MR. BRADLEY: Thank you.

18 BY MS. NGUYEN:

19 Q. And besides the live streaming that you did on
20 the day you went to Worldcon 76, have you live streamed
21 anything else related to Worldcon 76 or the dispute that
22 you have with them?

23 A. I'm -- I'm sure I made a video or a live stream
24 about getting banned, maybe multiple. I don't know.

25 Q. Would that have been posted on your Facebook?

1 A. No, they'd be on my YouTube channel.

2 Q. Okay.

3 A. Uh-huh.

4 Q. So we're going to ask for those if you can find
5 those and provide them to us, so don't delete them,
6 okay?

7 A. Okay.

8 Q. Besides your Facebook account and your YouTube
9 channel, have you posted videos about Worldcon 76
10 anywhere else, on any other platform?

11 A. I probably did on the Periscope platform also,
12 which is Twitter's video platform.

13 Q. Do you still have those?

14 A. I don't know about that. I think I have
15 Periscope set to auto delete, so I don't know that I
16 have anything on there. That platform's really hard to
17 use.

18 Q. Do you know what you posted on there about
19 Worldcon 76?

20 A. It would be the same sort of thing on my
21 YouTube channel. Or I think I actually live streamed
22 the Facebook Live when I was there to both platforms,
23 but I'm not sure.

24 Q. And besides Periscope, any other platform that
25 you posted videos on regarding Worldcon 76?

1 A. No.

2 Q. At Worldcon 76, you -- you went only on Friday,
3 right?

4 A. Yeah. Yes. To my knowledge.

5 Q. Okay.

6 A. I only went one day.

7 Q. Okay. You're aware that there was a rally
8 organized outside of Worldcon 76 during the convention?

9 A. Yes.

10 Q. Were you part of the group that organized that
11 rally?

12 A. Yes.

13 Q. What kind of rally was it?

14 A. It was a rally protesting the amplification of
15 people with platforms who support pedophilia.

16 Q. And what role did you have in organizing that
17 rally?

18 A. I helped spread the word.

19 Q. Did you attend the rally?

20 A. No, I did not.

21 Q. Why not?

22 A. California had some wildfires that day, and my
23 son has a deadly lung disorder, so we had to get out of
24 California to get away from the smoke. Ironically, I
25 would have not been audible to attend Worldcon anyway

1 Q. Do you recall that this was sometime in 2018?

2 A. No. This would have been this year, so...

3 Q. This year as in 2021?

4 A. I'm sorry. No. I forgot it's a new year.

5 2020. Yeah.

6 Q. Okay. Do you remember what month of 2020?

7 A. Oh, it looks like it is 2018 from the bottom of
8 it, because this guy clipped this. Okay.

9 I've had similar conversations because,
10 obviously, race relations is something a lot of people
11 discuss in our society. So I guess it would be 2018.

12 Q. Are you still friends with Morgan Tysor and
13 Chad Bruns now?

14 A. I might be. I have 3,500 Facebook friends, so
15 I don't monitor that.

16 Q. Are they part of the sci-fi community?

17 A. Yes. Probably.

18 MS. NGUYEN: Benjamin, number 18, please. It's
19 the document called Twitter August 11, 2017.

20 (Exhibit 10 was marked for identification.)

21 MS. NGUYEN: What's been marked as Exhibit 10
22 is a one-page document. It looks to be a printout of a
23 tweet by you, dated August 11, 2017.

24 BY MS. NGUYEN:

25 Q. Mr. Del Arroz, please take a look and let me

1 know if you recognize that tweet by yourself.

2 A. Yes.

3 Q. Do you remember making that post?

4 A. Yeah. I attended a conference, and this was a
5 quote by a fellow who I did not attribute. His name is
6 Ted Dekker. He's a very popular and prominent Christian
7 writer who speaks at a lot of conferences across the
8 country. He states he's not on social media because he
9 doesn't see it -- he sees it as antisocial rather than
10 social, and he likes to actually connect with real
11 people. And so he says social media really is only for
12 three things, which is attacking, defending, promotion,
13 which are the three things I listed here.

14 I'm not sure what this was in context to
15 because, again, it seems like this was just taken out of
16 the middle of something that I don't know what else it
17 was for.

18 But yeah, that was a quote that stuck with me,
19 and I agree that social media really boils down to those
20 three things.

21 Q. Have you deleted any of your tweets?

22 A. I did, on Tuesday, delete, I think, every tweet
23 up until Tuesday.

24 Q. Yesterday?

25 A. Last Tuesday. Sorry. The 6th.

1 Q. Okay. Tell me what it is, please.

2 A. This looks like it's from a site called
3 gab.com, which is a -- a Twitter-alternative site,
4 basically the same thing.

5 Q. And is your handle the @otomo?

6 A. Yes.

7 Q. Is there any significance to that name?

8 A. Yes. Otomo is an ancient Japanese samurai
9 clan, and again, just because of my interest in fantasy
10 and all that, I have a good interest in samurai.

11 Q. And you said it's a Twitter alternative; how is
12 it different than Twitter?

13 A. They are less restrictive in what they allow.
14 So they tend to be more for the free speech of
15 everybody.

16 Q. And when did you use the Gab site as opposed to
17 posting on Twitter?

18 A. I post a lot of things redundantly. So I try
19 to get on every platform that I can conceivably find
20 that exists, and then I post everything everywhere just
21 for the maximum exposure, because at the end of the day,
22 I'm trying to use these accounts to garner a following
23 to sell books.

24 Q. Okay. So that goes to what you've stated here,
25 that you post everywhere to maximize the exposure for

1 everything?

2 A. There you go.

3 Q. Okay. And then you -- this looks as if it was
4 from May 20, 2018; does that sound right to you?

5 A. Could be, sure.

6 Q. Have you deleted anything from your Gab.com
7 postings?

8 A. Gab delete itself, unfortunately. So there was
9 a period where they switched servers to their own
10 servers, and everybody had to re -- redo everything.
11 Once again, I think that was in 2019. I don't remember
12 the exact time. So anything prior to that's not there.

13 Q. You're still using Gab now, correct?

14 A. Yes.

15 Q. And how often do you post on Gab?

16 A. My blog, my YouTube posts, and then maybe --
17 you know, four or five posts a day.

18 Q. Okay. And so all those posts since 2019, those
19 should still be there, right?

20 A. Correct.

21 Q. Okay. Here in this Exhibit 11, you have down,
22 "If they ban me, (which I assume they will)."

23 Who's "they"?

24 A. It looks like this is in reference to Facebook.

25 Q. Okay. So you are anticipating that Facebook

1 ping me. I'll start a chart."

2 Did anybody take you up on that offer?

3 A. Yeah, a few science fiction authors did, and --
4 and what this was was creating some funny memes on the
5 internet to post on our own pages. You know, not
6 bothering anybody. But if somebody came to our own
7 pages and was following our feed just to -- I don't
8 know. On the Internet, we call it "hate following,"
9 where people actually follow you with the intention of
10 getting mad at and you hating you, and if they were
11 doing that, we would have, you know, had a good laugh
12 about it, so -- because when people get angry over free
13 speech, it's pretty ridiculous.

14 Q. And what does "troll" mean, T-R-O-L-L?

15 A. So trolling is kind of known on the Internet as
16 just trying to elicit an emotional response of some
17 sort. You know, so posting a funny image could be
18 considered that. Saying something with the intention of
19 making people laugh could be considered that. It's
20 just -- I don't know. There's a broad spectrum of
21 what -- of what people take that to mean. I'm taking
22 that to mean post funny images on my own social media.

23 Q. And does that also include posting things to
24 provoke others? So not just humorous things, but to
25 provoke other people?

1 (Exhibit 17 was marked for identification.)

2 BY MS. NGUYEN:

3 Q. Mr. Del Arroz, please take a look at what's
4 been marked -- marked as Exhibit 17.

5 A. Okay.

6 Q. And for the record, Exhibit 17 is a -- looks
7 like a post dated October 5, 2017.

8 Mr. Del Arroz, is that one of your posts?

9 A. Yes.

10 Q. From October 5, 2017?

11 A. Yes.

12 Q. Is that a Twitter post?

13 A. Yes.

14 Q. And what you've attached there, was it an email
15 that you received from someone by the name of Cat Rambo?

16 A. Yes.

17 Q. And was it -- was that email received by you in
18 response to some email you sent to Ms. Rambo?

19 A. Yes. We were in a back-and-forth communication
20 for a while about statistics of people in publishing,
21 and she didn't -- I -- I put in -- this was about a blog
22 of mine, and it originated -- and I had a good
23 relationship with Ms. Rambo before this. She was the
24 president of the Science Fiction Writers of America, and
25 they were, of course, also influenced after the Worldcon

1 banning by banning me from their club and actually using
2 Worldcon as an example of why I should be banned from
3 that professional institution. But before I worked with
4 her, I was an assistant editor on a book anthology, and
5 she submitted a short story to it, and I worked on her
6 short story and had an amicable relationship.

7 I posted a blog in -- also 2017, again, about
8 statistics and writing and what kind of stories get
9 published, and she didn't like my blog and took to that
10 website we mentioned earlier, File 770, and left
11 negative comments calling me -- what did she call -- she
12 called my writings egregious stupidity, and so I emailed
13 her and said, "Look, in your capacity as SFWA president
14 and as an authority in science fiction, you probably
15 shouldn't be going out and calling American science
16 fiction writers and their writings egregiously stupid.
17 That's contrary to your mission of what your club's
18 supposed to do to uplift people."

19 And she wrote back, and we had a little bit of
20 a back and forth, and eventually, I, again, tried to
21 reasonable resolve this because she seemed angry, you
22 know, much like the way Worldcon just reacted to my
23 existence, and so I said, "Look, let's talk and hash
24 this out because, you know, I don't think we're on
25 opposing sides here as independent writers," and she

1 sent me this back in reply.

2 So this is obviously a part of a conversation
3 about that, because again, whoever's taking these clips
4 seems to like to take my replies without actually
5 showing what the conversation was about, and that's
6 probably in order to, you know, try to make me look bad.
7 I don't know why they would have done that. But again,
8 I just said, "I don't like to air private
9 communications, but the amount of vitriol I've faced
10 because of her is out of control."

11 And because of her postings on File 770, and
12 actually using the SFWA Twitter account to diminish my
13 work and my -- my findings, that's when people started
14 really attacking me on the road towards this Worldcon
15 thing, and it's a part of why I emailed Worldcon at the
16 time and said that there was violent threats against me
17 and, you know, people who might try to harass me at the
18 convention in September 2017, and again, it's part of
19 that incident where I didn't get a reply from Worldcon
20 staff.

21 Q. So are you saying that all of the attacks that
22 you received came as a result of her -- her action?

23 A. A good portion of them were, yes. She was --
24 she was a very big authority in sort of science fiction
25 publishing as the president of the -- as president of

1 has dug this up to hurt me on the Internet, I don't know
2 why. It's just shocking the lengths that people will go
3 to in order to try to -- try to cause me emotional
4 distress.

5 Q. So this is in reference to some -- some
6 political campaign that you were involved in?

7 A. Yes. I attempted to run for Congress in 2010,
8 and when we got the diagnosis back, I backed out of
9 that, because you know, I was not going to -- I wouldn't
10 be able to do the job of being in Washington, DC and
11 here in California halftime -- split time for a child
12 with big medical needs like this.

13 Q. And the post itself, in the Twitter post, it
14 seems to be referencing some other events or something
15 else that you were trying to use this as what the author
16 says, "the same excuse for."

17 What is he referring to?

18 A. I don't know the conversation, but -- yeah.
19 It's -- it's really ugly that people would want to try
20 to gotcha me over this. So I have to deal with the
21 possibility of my son dying before I do, which is pretty
22 rough.

23 Q. Here he's talking about your shield against
24 personal accountability; do you know what he's talking
25 about?

1 He's worked for Marvel Comics. In this one, he's
2 talking about SFWA's banning of me, which came because
3 of Worldcon also.

4 MS. NGUYEN: Next document, please, Benjamin.
5 It's the 25th document, Twitter January 20, 2018, but
6 without the hyphen.

7 (Exhibit 23 was marked for identification.)

8 BY MS. NGUYEN:

9 Q. Mr. Del Arroz, please take a look at what's
10 been marked as Exhibit 23. It's a one-page document,
11 also tweets between you and other people.

12 Do you recognize them as tweets between you
13 and -- actually, just tweets by you, right?

14 A. Yes. They're quote-tweeting people's comments
15 about me. So there are more prominent science fiction
16 writers -- Gareth M. Skarka and Scott Lynch, who, of
17 course, were talking badly about me on Twitter because
18 of the way that Worldcon and SFWA treated me. So at
19 this point, I'm being overwhelmingly piled on by major
20 members of the industry, and so I'm attempting to at
21 least mitigate some of that damage by -- by downplaying
22 what they're saying.

23 Q. And was this around January 20, 2018?

24 A. It appears like it's around then.

25 Q. And do you personally know Mr. Skarka or

1 A. It looks like it is referring to my likes and
2 followers, but that's weird, because I've never had
3 8,000 followers, so I -- I don't -- I'm not sure what
4 this is coming from.

5 Q. And do you know, as of 2018, how many followers
6 you had?

7 A. It was around 3,000, as I recall.

8 Q. And would it have been noted on this type of a
9 banner or where it's located on this screenshot?

10 A. Yes. So that's why I find that confusing.
11 I've never had anywhere near 8,000. I would definitely
12 like to have that many. I have 5,800 now, and I reached
13 my peak a few weeks ago before the bannings happened. I
14 think about 6,200 is the highest I've ever had.

15 Q. And the tweets, is that the total number of
16 tweets you had since you opened the accounts?

17 A. Yeah. So I've had to put out a lot of content
18 in order to get the followers I've gotten.

19 Q. Do you earn any money from your tweets?

20 A. Just from posting my book links and sales,
21 which I do about once a day.

22 Q. Okay.

23 A. Uh-huh.

24 Q. So it's not like YouTube where you have ad
25 revenue?

1 A. They said I was welcome to attend.

2 Q. Okay. So in 2016, you were invited as a
3 speaker, correct?

4 A. Yes.

5 Q. And then in 2017, you were not invited?

6 A. Correct. Yes.

7 Q. It's not as if they invited you and then
8 withdrew the invitation, correct?

9 A. Correct.

10 Q. And were you friends with the person that went
11 by the same Spencimus?

12 A. No. He was apparently attacking me online --
13 Twitter. Other than -- I kind of know his name as an
14 author who works for Tor Books.

15 Q. And what is his full name?

16 A. I don't remember.

17 Q. And what does the "Sperg," S-P-E-R-G, what is
18 that in reference to?

19 A. It's an Internet insult. Just Internet slang
20 insult.

21 Q. What's the insulting part about it?

22 A. It implies the person has Asperger's and is
23 spewing nonsense because of that condition.

24 Q. And what did you mean by "tone police"?

25 A. "Tone police," I'm referring to -- she's

1 A. Correct. And she was talking about harassing
2 people who -- who identify with the -- the hashtag on
3 Twitter, which is called Comicsgate.

4 Q. Comicsgate?

5 A. Yes.

6 Q. And what is that in reference to?

7 A. Comicsgate started -- when I uncovered the
8 screenshots about -- about trying to harass Mr. Meyer at
9 New York Comic Con, I -- I -- I grabbed -- I started a
10 hashtag on Twitter. It was called Comicsgate, hashtag
11 Comicsgate, because there was a scandal, of course,
12 going on with the industry professionals conspiring to
13 try to hurt somebody.

14 So "gate" in journalism terms, you know, it
15 refers to the Watergate, which refers to a scandal, and
16 of course, this then refers to a scandal in the comic
17 book industry.

18 Q. Here in your third paragraph where you're
19 talking about SJWs, what is that in reference to?

20 A. As mentioned earlier in the deposition, social
21 justice warriors. It's a pejorative term used since the
22 1960s or '70s.

23 Q. And then in the middle of your post were you're
24 referencing something: "Quesada or a Simone."

25 What are those in reference to?

1 A. Let me read this real quick.

2 Q. It's the end of Paragraph 1.

3 A. Yeah. So I was telling people if Mags is
4 posting something -- which is the Bodybags Visaggio
5 person -- not to give her attention, because if you
6 start sending a bunch of messages that are angry at her
7 on her various platforms, it's only going to boost her
8 signal. It's an effect called the Streisand effect, and
9 when people pile on you on social media, because there's
10 more views and more attention, it increases the
11 algorithm, and then more people end up seeing you. So a
12 lot of times these situations can be spun to your
13 advantage even when you're in a conflict situation.

14 So it was my estimation that Mags was
15 attempting to rile up Comicsgate. You know, it's
16 like -- like -- like what we were talking about,
17 trolling, right? So they would go on and pile on her
18 and show they were irrational giving attention, much
19 like I was doing in another way.

20 So I was advising this group not to do that and
21 not to engage with her, and if they wanted to engage
22 with somebody on that level, they should do it with
23 Joe Quesada, who was the -- is the chief creative
24 officer of Marvel Comics, because he's big enough of a
25 name. He doesn't gain anything from the attention, or

1 Gail Simone, who's another large comics writer who has
2 such a big following/fan base that it would not actually
3 result in making them more famous.

4 Q. Mr. Del Arroz, as part of this lawsuit, we
5 asked you about what kind of damages you are claiming.

6 A. Uh-huh.

7 Q. Do you remember that?

8 A. Yes.

9 Q. And can you tell me what damages and the amount
10 of damages that you are claiming for this lawsuit?

11 A. I -- I know that we came up with a number based
12 on an estimations in 2018, which was in the suit itself.
13 I don't know the number off the top of my head like
14 this. However, the damages are in results of the
15 marketing efforts and failure because of Worldcon's
16 libel of me, which is in that email from a marketing
17 professional as such. The failure of my launch of my
18 book The Stars Entwined, which should have been a much
19 bigger launch than my prior book, For Steam and Country,
20 just because it's a much bigger genre, and --

21 Q. And what is -- I'm sorry.

22 A. Go ahead.

23 Q. When did you finish that book?

24 A. Writing it?

25 Q. (Nonverbal response.)

1 A. I wrote it in 2017, but I released it in April
2 of 2018.

3 Q. Okay. What other damages?

4 A. The inability to get published by a mainstream
5 publisher other than a small indie publisher who is
6 likely to go out of business, so any of the big four
7 publishers. My reputation is -- is tarnished to the
8 point where they would never consider any of my
9 manuscripts at this point. Same with -- I would never
10 be able to get my books sold to Netflix, Hollywood,
11 those sorts of things, because of the reputation damage
12 caused here, and then, of course, the subsequent dip in
13 book sales from The Stars Entwined forward because I had
14 to work my way back up to build an audience who might
15 not be aware of the Worldcon thing because I lost so
16 much there.

17 Q. So were you in discussions with any of the big
18 four publishers prior to the Worldcon ban?

19 A. No, not except for that time in 2017 when we
20 were -- we were close to it, but I would have definitely
21 been submitting again. I have talked to an agent in the
22 past, and he, you know, kind of -- kind of researched me
23 and then refused to -- refused to represent me. This is
24 back in 2018 also.

25 But that's -- at that point, I kind of gave up

1 All right. You should have the correct one
2 now. I apologize.

3 (Exhibit 28 was marked for identification.)

4 BY MS. NGUYEN:

5 Q. Please take a look at that. I'm going to
6 direct your attention to your response to Special
7 Interrogatory Number 62.

8 A. 60 -- gosh.

9 Okay.

10 Q. Actually, at 61 first, before we get to 62.
11 There, the interrogatory asks about your items of
12 damages for this case, and you set them out in A, B, C,
13 D, and E.

14 Are those the damages that you're claiming for
15 this case?

16 A. Yes.

17 Q. Anything else that I don't see on there?

18 A. No, not to my knowledge.

19 Q. Now, going to your response to Number 62, I
20 believe that's where you're explaining how you got some
21 of these numbers.

22 A. Yes.

23 Q. You stated that you were expecting to sell
24 60 to 100 books at Worldcon 76, correct?

25 A. Yes, that's correct.

1 Q. And the convention that you had gone to
2 previous to Worldcon 76, was that the Bay Con one in
3 2017?

4 A. I've been to a number of conventions and set up
5 and sold books. So yes, my estimate is over a weekend,
6 you know, I'm pretty reliably can sell 60 to 100 books,
7 yes.

8 Q. And do you keep records of how many books you
9 sell at each of these conventions?

10 A. I've got my -- notes by themselves. I just --
11 you know, I take a Stripe payment or whatnot, and that
12 goes into my general, you know -- my general pool of
13 income, but -- but I don't usually save each of them to
14 check that.

15 Q. So prior to the August 2018 Worldcon 76,
16 immediately prior, what was the -- the immediately-prior
17 convention that you attended where you sold some books?

18 A. That would be LibertyCon.

19 Q. And when was that?

20 A. I think August 2017, somewhere in there.

21 Q. And where was that held?

22 A. Chattanooga, Tennessee.

23 Q. And at the time, how many books did you have
24 available to sell there?

25 A. I had two books, so -- right.

1 Q. And did you also -- strike that.

2 Did you have a table where you had these books
3 available to sell?

4 A. Yes.

5 Q. Okay. Did you have to pay for that table?

6 A. No, I didn't.

7 Q. And how many books did you sell at that
8 LibertyCon -- convention?

9 A. I believe around 60.

10 Q. And you have records of that?

11 A. Probably not.

12 Q. When you sell these books, how did you take
13 payment?

14 A. LibertyCon would have been cash only at that
15 point. I got a Stripe deal for conventions in 2019, so
16 I was able to take cash and Stripe payments at that
17 point.

18 Q. So prior to 2019, when you were selling books
19 at conventions, were they all in cash?

20 A. Yes.

21 Q. And based on what you're telling me, you didn't
22 keep a record of how many books you sold?

23 A. I mean, at the time, I would have just
24 deposited it and marked it as income and marked whatever
25 my book costs were as an expense. I wouldn't have it

1 previous convention that you went to where you also sold
2 some books?

3 A. I -- I set up at Image -- it was called Image
4 World, I believe, and I set up at the -- for also the --
5 gosh, it's called the APE, and I forget what it stands
6 for, but it's something about independent comic books.

7 Q. Where was that convention located?

8 A. San Francisco, California.

9 Q. Was it also a four-day convention like
10 Worldcon?

11 A. No, and neither is LibertyCon. ImageCon was a
12 one-day event, and APE was for two days.

13 Q. And how many books did you sell at APE?

14 A. I think close to a hundred.

15 Q. Do you have a record of that?

16 A. Probably not at that point. I was doing it as
17 a hobby then, so...

18 Q. And at the time, how many books did you have to
19 sell?

20 A. One.

21 Q. And in 2018, did you go to any convention?

22 A. I went to LibertyCon again, yes.

23 Q. Okay. And where was that?

24 A. Chattanooga, Tennessee.

25 Q. And when was it?

1 A. No, because I didn't have any stock, so --
2 yeah.

3 Q. And at the time, how many books did you have to
4 sell?

5 A. I believe four.

6 Q. Did you attend any other convention in 2018?

7 A. No.

8 Q. So this number here of the 60 to 100 books that
9 you were expecting to sell at Worldcon 76, what was the
10 net profit that you would have received from each of the
11 books?

12 A. About \$16 each.

13 Q. And then you -- you asserted here that the lost
14 profit of \$5,000 was for the newly launched book, The
15 Stars Entwined, correct?

16 A. Yes.

17 Q. And what is the basis of that approximation of
18 5,000?

19 A. We -- we took my sales, I believe from 2019,
20 and -- and checked the launch of For Steam and Country,
21 which is the book before the Worldcon defamed me, and
22 then The Stars Entwined, which was the book directly
23 after Worldcon defamed me, and showed the difference in
24 revenue between the two, so...

25 Q. So what record did you have to show the revenue

1 from For Steam and Country?

2 A. The report from Amazon.

3 Q. So the report from Amazon is the only document
4 that you have on which you base the estimation for The
5 Stars Entwined, as well?

6 A. Yes. About 90 percent of my sales -- or
7 95 percent of my sales come from Amazon, so...

8 Q. Did you put The Stars Entwined on Amazon for
9 sale?

10 A. Yes.

11 Q. Since when?

12 A. April 2018.

13 Q. And in 2018, how much in revenue did you get
14 for that book?

15 A. I believe it was -- I 2018 was under a thousand
16 dollars total.

17 Q. What about 2019?

18 A. I think another \$3- or \$400.

19 Q. What about 2020?

20 A. I think another \$5- or \$600. I haven't looked
21 yet.

22 Q. So all these reports from Amazon, do you have a
23 copy of them?

24 A. Yeah. I have the -- I have the one we based it
25 upon, because it was with a publisher at the time, so I

1 had to relaunch it later. So there's two different --
2 two different things, but -- yeah.

3 Q. You stated here in your response to special
4 interrogatory number two that other book sales were also
5 affected.

6 Which other books and how much?

7 A. I would say my For Steam and Country sequels,
8 which is The Blood of Giants and The Fight For
9 Rislandia, which came out in the summer of 2018. And
10 those, I don't remember the direct sales, but they're --
11 they're -- I believe they sold about a tenth of what For
12 Steam and Country did also.

13 Q. So both of those books came out in the summer
14 of 2018, you said?

15 A. Yes. Correct.

16 Q. And what is a tenth of the steam -- what is it
17 called? The steampunk one. How much would that one be?

18 A. I believe my revenue for For Steam and Country
19 at the time would be around \$7,000. I'm guesstimating
20 because it's been a couple years. So they were each
21 kind of floundering in the \$7-/\$800 range.

22 Q. And that's based on the Amazon reports that you
23 referenced earlier?

24 A. Correct.

25 Q. You talked about having to buy ads on Facebook.

1 Q. What about Patreon; do you have a presence on
2 that platform?

3 A. Yes.

4 Q. What's the user name?

5 A. Jon Del Arroz.

6 Q. What is that used for?

7 A. I write short stories, or I give my books out
8 early to people who subscribe, so they pay me to
9 write -- write extra content for them, basically.

10 Q. And when did you set up your Patreon?

11 A. I don't remember. I think 2017.

12 Q. Is it still active now?

13 A. Yes.

14 Q. Okay. What about Indiegogo? Do you have an
15 account on there?

16 A. Yes.

17 Q. When did you set that up?

18 A. 2018.

19 Q. 2018?

20 A. Uh-huh.

21 Q. Yes?

22 A. Yes.

23 Q. And I think your YouTube channel, you said you
24 set that up in 2014?

25 A. Yes, about I only got monetized in 2020.

- 1 Q. Got it. Do you have an account on Pinterest?
- 2 A. I think so. I don't use it though, so...
- 3 Q. Who's -- who would have set up your Pinterest
- 4 account?
- 5 A. I would have, to check it out.
- 6 Q. Okay. Do you remember when you set that up?
- 7 A. No.
- 8 Q. Do you have an account on Reddit?
- 9 A. I used to, so...
- 10 Q. Not any more?
- 11 A. No.
- 12 Q. During which period of time did you have an
- 13 account on Reddit?
- 14 A. I think up to 2018-ish. Around there.
- 15 Q. I'm sorry. Go ahead and finish.
- 16 A. I think up to 2018. I don't know exactly. I
- 17 don't know precisely.
- 18 Q. And when did -- strike that.
- 19 What did you use that account for on Reddit?
- 20 A. I attempted to get on some fantasy or sci-fi
- 21 writing groups at some point, but I didn't understand
- 22 how to use it, so I didn't use it very much.
- 23 Q. Okay. What about Tumblr? Do you have an
- 24 account on there?
- 25 A. No.

1 A. Yes.

2 Q. Do you know how many followers you have on your
3 YouTube channel now?

4 A. 2,077, actually. I checked it again, so I got
5 seven more today.

6 Q. Do you know how many followers you had in 2017?

7 A. Less than 200.

8 Q. What about in 2018?

9 A. Probably less than 200 also, yeah.

10 Q. And when did you start getting more followers
11 on your YouTube channel?

12 A. Middle of 2019. I had one video that went
13 fairly viral, so...

14 Q. Which video was that?

15 A. It was a review of Ethan Van Sciver's comic
16 book called Cyberfrog.

17 Q. Do you know how many followers you have on
18 Facebook?

19 A. About 3,500.

20 Q. And how many did you have in 2000 -- at the end
21 of 2017 on Facebook?

22 A. I think around a thousand.

23 Q. What about the end of 2018?

24 A. Probably around 1,500/2,000, somewhere in
25 there.

1 Q. And did you do something to increase the
2 following you had on Facebook?

3 A. Yeah. I posted a lot of funny memes and
4 pictures and things so that people want to come to my
5 page.

6 Q. Same strategy for Twitter?

7 A. Yes.

8 Q. And at the end of 2017, how many followers did
9 you have on Twitter?

10 A. I believe I had 2,000, maybe less.

11 Q. And what about by the end of 2018?

12 A. I think that one grew a little faster. I think
13 I had around 3,000 at that point.

14 Q. And currently again?

15 A. A little less than 6,000. 5,900.

16 Q. Has any of your social media accounts been
17 suspended?

18 A. Yes. Twitter has and Facebook has. Actually
19 YouTube has also.

20 Q. Which has also?

21 A. YouTube has also.

22 Q. Let's take Facebook first.

23 When was it suspended, your Facebook account?

24 A. I think 2017 sometime.

25 Q. How many times has Facebook suspended your

1 Q. And what did you explain to Facebook to get off
2 the suspension?

3 A. I just wrote back and said this has nothing to
4 do with anything and why, and that was that.

5 Q. And what was the green flag -- what was the
6 significance of the green flag to you that you posted
7 it?

8 A. Somebody got it for me for Christmas because
9 they know that I do a lot of the -- sort of online image
10 posting and things like that, and they thought it was a
11 funny joke to give it to me for Christmas, so...

12 Q. And when did Twitter suspend your account?

13 A. Twitter suspended me in 2018 sometime, so...

14 Q. Beginning the 2018 or end of 2018?

15 A. I don't remember exactly. I think it was in
16 the middle somewhere.

17 Q. Before or after the Worldcon convention?

18 A. After.

19 Q. Do you know why --

20 A. Or maybe it was before. By that point, I had a
21 lot of people who, again, were just on my feed just
22 trying to -- trying to bother me and cause problems. So
23 they were scrolling through my posts, and I came upon a
24 post where I said -- I believe I said that -- that
25 transgenderism is by definition a mental illness because

1 it was listed as a mental illness in the DSM IV, and so
2 Twitter claimed that was hate speech, so --

3 Q. And I didn't catch what you said earlier: Was
4 that suspension before or after Worldcon 76?

5 A. I think it was before, but I might be --

6 Q. And -- I'm sorry?

7 THE REPORTER: Can you repeat? It kind of cut
8 out.

9 THE WITNESS: I don't know the exact time,
10 so...

11 BY MS. NGUYEN:

12 Q. And how many people would have had to report
13 you for Twitter to suspend your account?

14 A. Just one, so...

15 Q. And how long was your Twitter account suspended
16 for?

17 A. Seven days.

18 Q. How did you get it off the suspension?

19 A. I waited seven days.

20 Q. So you didn't have to appeal it or anything
21 like you did with Facebook?

22 A. No.

23 Q. Did you have to take off that post?

24 A. Yes.

25 Q. Okay. And when was your YouTube account

1 suspended?

2 A. Last year. 2020. I think May.

3 Q. Why?

4 A. They -- I review books on YouTube, and because
5 I actually show the books, somebody reported it as,
6 like, a copyright issue, so it was a false report, so I
7 was -- I had -- I was able to get rid of that quickly.

8 Q. So just one suspension on each of those
9 platforms, correct?

10 A. Yes.

11 Q. Do you know how many times you've been
12 interviewed by media channels?

13 A. A lot. I solicit a lot of media channels. So
14 I go out and tell people on YouTube, "Hey, I'd like to
15 be interviewed." So I try to be everywhere all the
16 time, so there's too many.

17 Q. You don't keep a running list?

18 A. No, no. It used to be exciting the first
19 couple times, but now I'm used to it.

20 Q. Would you say that you get interviewed several
21 times per week, per month?

22 A. Per month, I'd say. Because I do most of my
23 content on my own channels.

24 Q. So on average, how many times per week?

25 A. Maybe -- maybe once or twice a week.



Make the Future...

Worldcon 76 in San José: The 76th World Science Fiction Convention

Thursday, August 16, 2018 (2018-08-16) - Monday, August 20, 2018 (2018-08-20)

San Jose McEnery Convention Center

150 W San Carlos St
San Jose, California 95113
United States
Event Details

Email: info@worldcon76.org
Phone: +1-408-905-9366
Worldcon 76
c/o SFSFC
PO Box 61363
Sunnyvale CA 94088-1363
USA

[Email Us](#)



There is still time...reserve your hotel!



Hilton San Jose
300 S Almaden Blvd San Jose, CA 95110, United States [Map](#)



San Jose Marriott
301 South Market Street San Jose, CA 95113, United States [Map](#)



Hyatt Place San Jose Downtown
282 Almaden Blvd San Jose, CA 95113, United States [Map](#)

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Witness:
Jonathan Del Arroz

Exhibit 02

01/13/2021 B Gerald

Thank you for registering for Worldcon 76 in San Jose

Return to the Worldcon 76 in San Jose website

Personal Info

Registration ID:

106209754

Registrant:

Jon Del Arroz
PO Box 3601
Danville, CA 94528
United States

Registration Date:

12/24/2017 9:16 AM

membership type:

Supporting (basic)

Status:

Confirmed

Phone (optional, but very useful if email fails):

9256839934

Email:

jdelarroz@gmail.com

Name you would like to appear on your badge:

Jon Del Arroz

RealNameOK**FanNameOK****SFSFC has my permission to share my contact information with future Worldcons.****Program interest**

Fees

Full Attending Event Fee

Quantity:	1
Unit Price:	\$210.00
Amount:	\$210.00

Supporting Membership Fee

Quantity:	1
Unit Price:	\$50.00
Amount:	\$50.00

RegOnline Uplift

Quantity:	1
Unit Price:	\$3.55
Amount:	\$3.55

Subtotal:	\$263.55
------------------	-----------------

Total:	\$263.55
---------------	-----------------

Transactions

^

Transaction Amount

Date:	12/24/2017
Amount:	\$213.55
Balance:	\$213.55

PayPal Payment Details

Date:	12/24/2017
Amount:	(\$50.00)
Balance:	\$163.55

Adjustment Due to Changes in Fees

Date:	1/2/2018
Amount:	\$50.00
Balance:	\$213.55

Other Credits

Date:	1/2/2018
Amount:	(\$210.00)
Balance:	\$3.55

Other Credits

Date:	1/2/2018
Amount:	(\$3.55)
Balance:	\$0.00

Current Balance:	\$0.00
-------------------------	---------------

Payment Method:

PayPal

Refund Information

By registering for Worldcon 76 you agree to abide by the rules and policies of the convention.

Memberships in the 76th World Science Fiction Convention are not refundable, except in extraordinary circumstances. They may be transferred to another person on the condition that any exchange of funds between the parties involved does not exceed the amount paid by the registrant. Such transactions are private and not brokered by Worldcon 76.

Requests for refunds will be handled on a case by case basis. Refund and/or transfer requests should be sent to registrar@worldcon76.org

[Event Contact Information](#) |

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----- Forwarded message -----

From: **Incident Response Team Worldcon 76** <irt@worldcon76.org>
Date: Tue, Jan 2, 2018 at 7:30 PM
Subject: Re: Worldcon 76 membership - Jonathan Del Arroz
To: Jon Del Arroz <jdelarroz@gmail.com>

Jonathan,

Our decision about your attendance is final. Any conversations that will happen with you will be via email so that both sides have a record of what was said. If you would like to report the names of your harassers as well as their actions to us we will investigate.

Lori

On Tue, Jan 2, 2018 at 6:14 PM, Jon Del Arroz <jdelarroz@gmail.com> wrote:

Sorry obviously was blindsided by the email as I couldn't have expected to be targeted and made a victim over people's threats against me.

Your email is completely false. If you had any real interest in safety -- especially mine -- you would talk to me and find out what's going on and hear my side of the story. Whoever is reporting anything to you, is someone who is trying to targeted harass me and you are enabling that by continuing with this path. I would recommend calling me to discuss what's going on and why some fringe people in the science fiction community hate me and want to do harm to me, when I simply want to attend a convention and have fun in science fiction like everyone else. There are people flying from far distances simply to come see me, and it would be a detriment to the convention. I still aim available to talk this over and would happily do so.

thank you. Please call me rather than email it'd be easier to hear intentions rather than text.

On Tue, Jan 2, 2018 at 5:05 PM, Jon Del Arroz <jdelarroz@gmail.com> wrote:

What the hell? This is false 100%. Will the people who have threatened framing me for crimes be getting this?

Witness:
Jonathan Del Arroz

Exhibit 04

01/13/2021 B Gerald

On Tue, Jan 2, 2018 at 5:01 PM, Incident Response Team Worldcon 76
<irt@worldcon76.org> wrote:

Jonathan,

At this time we are converting your membership to Worldcon76 to a supporting membership as you will not be permitted to attend the convention. On your personal blog you have made it clear that you are both expecting and planning on engendering a hostile environment which we do not allow. If you are found on the premises of the convention center or any of the official convention hotels you will be removed.

Your payment of \$50 covers the cost of your supporting membership in its entirety, and you have no balance owing. As a supporting member your nomination and voting rights for the Hugo Awards and site selection are maintained. If you prefer a full refund that can be arranged.

Lori Buschbaum
Incident Response Team area head
Worldcon 76

--
Jon Del Arroz
The Leading Hispanic Voice In Science Fiction
Blog: <http://www.delarroz.com>
Amazon: <https://www.amazon.com/Jon-Del-Arroz/e/B01NBOZVCP/>
Patreon: <https://www.patreon.com/jondelarroz>
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El Campeador

@jondelarroz

Follow



Social media is for:

1. Attacking
2. Defending
3. Promotion

Nothing else. There's no real discussion or real "concern" here.

12:39 PM - 11 Aug 2017

1 Retweet 4 Likes



1



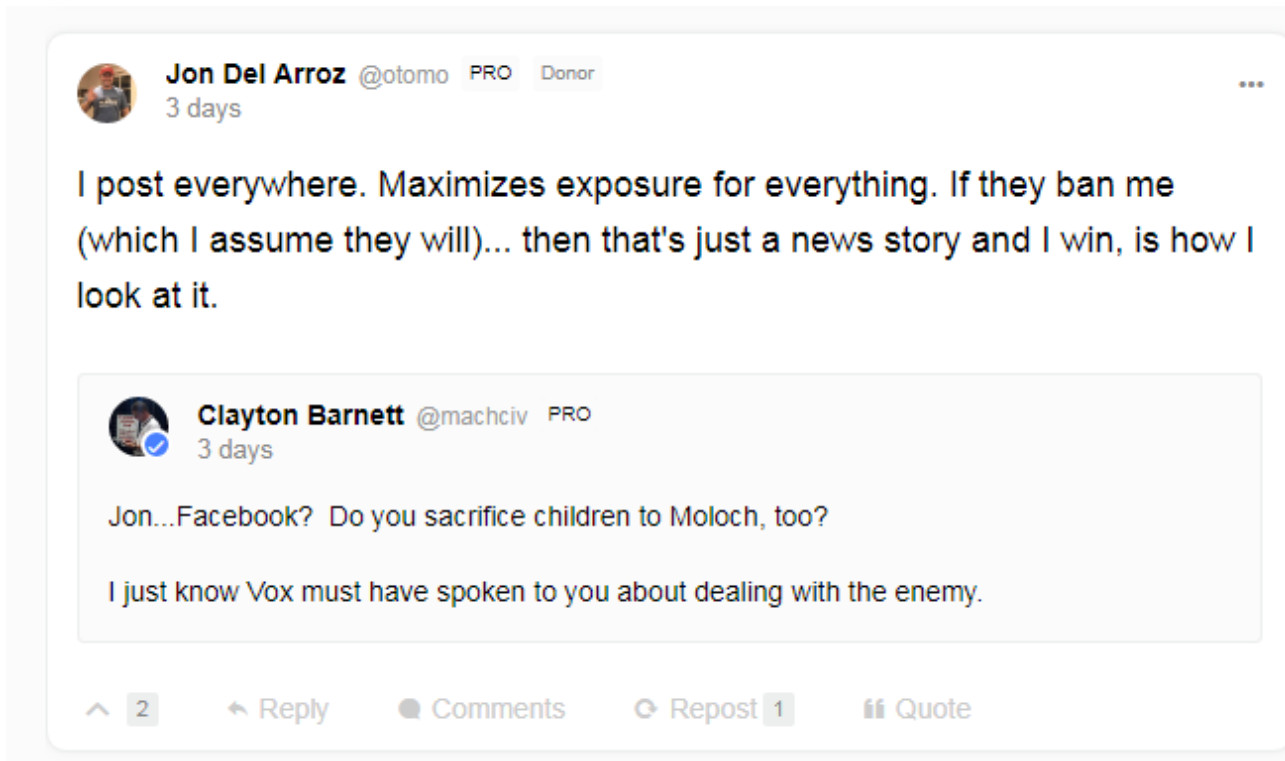
4

EXHIBIT D

Witness:
Jonathan Del Arroz

Exhibit 10

01/13/2021 B Gerald





Jon Del Arroz   @jondelarroz · 5 Oct 2017

Replying to @jondelarroz @area_matter_mk2 and 2 others

I don't like to air private communications but the amount of vitriol I've faced cuz of her is out of control

Re: Fun Discussion Topic Idea

September 19, 2017 at 9:46 AM

 Found in Gmail Inbox

Your e-mails are unwanted and unsolicited. This and any further e-mails will be forwarded to my attorney.



Cat Rambo

Writer. Editor. Teacher.

Website <http://www.kittywumpus.net>

Classes <http://catrambo.teachable.com>

Newsletter <http://www.kittywumpus.net/blog/newsletter/>

Patreon <https://www.patreon.com/catrambo>

Witness:
Jonathan Del Arroz

Exhibit 17

01/13/2021 B Gerald



SSJLarryDavid

@SSJLarryDavid

Follow



Replying to @jondelarroz @SegWuff

isn't that the same excuse you used when you dropped out of your political campaign?

it's disgusting enough u pulled ur son from school to watch u humiliate yourself - it's quite another to use him as ur shield against personal accountability. have you no shame?

We hope you enjoy this story that was shared with you.

Republican hopeful Jon Del Arroz drops bid for 11th District



1 image

AT&T 6:39 PM 22% lodinews.com

seeking rep. Jerry McNamara's seat was reduced to seven when Jon Del Arroz announced on Wednesday that he was dropping out of the race.

Del Arroz, 27, said in an e-mail that he was ending his campaign because his young son was recently diagnosed with cystic fibrosis.

"At this time in my life, the needs of my son rightfully take precedence," Del Arroz said in a news release. "Samantha and I love Mateo and are going to do everything in our power to make his life fulfilling."

"Running a contested campaign against an incumbent and then serving in Washington so far away from home is not an option that would

9:13 AM - 19 Aug 2018

1 Like



1

Witness:
Jonathan Del Arroz

Exhibit 21

01/13/2021 B Gerald



Jon Del Arroz 🇺🇸 🇧🇷 @jondelarroz · 42m

The "literally nobody" argument is difficult when people love my books and I am employed by three major media outlets that have bigger readership bases than any science fiction book period because of how niche the market's gotten over this political nonsense.

Gareth M. Skarka 🌹 @gmskarka

Replying to @gmskarka @scottlynch78

People keep forgetting he's LITERALLY NOBODY. The only traction he gets is the traction people give him by feeding his narrative. Take that away, he's got nothing....



1



7



Jon Del Arroz 🇺🇸 🇧🇷 @jondelarroz · 43m

Hi Scott. You should not talk smack about someone you don't know at all, bad look as a big author!! But SFWA's move is unprecedented, and is discrimination. You should not condone such actions because it could happen to you now that they set this precedent!

Scott Lynch 🔵 @scottlynch78

Replying to @gmskarka

I have to respectfully disagree with you, G.

1. Nothing SFWA did was ever going to placate JDA. Staging his public martyr act in ostentatious bad faith is what he does. He was going to...



1



3



7

Witness:
Jonathan Del Arroz

Exhibit 23

01/13/2021 B Gerald

Showing results for "facebook"

SEP 10	Facebook COMPLETED - Automatic Payment	- \$500.00 Entertainment
AUG 31	Facebook COMPLETED - Automatic Payment	- \$291.85 Entertainment
JUL 31	Facebook COMPLETED - Automatic Payment	- \$121.17 Entertainment
JUN 30	Facebook COMPLETED - Automatic Payment	- \$149.84 Entertainment
MAY 31	Facebook COMPLETED - Automatic Payment	- \$150.42 Entertainment
APR 30	Facebook COMPLETED - Automatic Payment	- \$154.82 Entertainment
MAR 31	Facebook COMPLETED - Automatic Payment	- \$154.64 Entertainment
FEB 28	Facebook COMPLETED - Automatic Payment	- \$139.96 Entertainment
JAN 31	Facebook COMPLETED - Automatic Payment	- \$251.33 Entertainment
2018		
DEC 31	Facebook COMPLETED - Automatic Payment	- \$410.00 Entertainment
NOV 30	Facebook COMPLETED - Automatic Payment	- \$52.05 Entertainment
SEP 30	Facebook COMPLETED - Automatic Payment	- \$2.64 Entertainment
AUG 31	Facebook COMPLETED - Automatic Payment	- \$1.91 Entertainment
AUG 30	Facebook - COMPLETED - Automatic Payment	- \$250.00 Entertainment
AUG 01	BB JDRH - WALK COMPLETED - Payment	- \$20.00 Donations

Witness:
Jonathan Del Arroz

Exhibit 29

01/13/2021 B Gerald

ASIN	Earnings ▼	Sales	Pages
Totals	\$12,661.45	4,522	588,034
For Steam and Country: Book One of the Adventures of Baron Von Monocle (http://www.amazon.com/dp/B071JNR9HB)	\$6,629.09	2,110	307,524
The Stars Entwined (http://www.amazon.com/dp/B079VVFJMZ)	\$1,801.67	655	87,759
The Blood of Giants: Book Two of the Adventures of Baron Von Monocle (http://www.amazon.com/dp/B07GCBL8QD)	\$1,600.13	371	80,820
The Fight for Rislandia: Book Three of the Adventures of Baron Von Monocle (http://www.amazon.com/dp/B07HNM38NB)	\$994.65	222	49,445
Make Science Fiction Fun Again (http://www.amazon.com/dp/B07KQ6PMNZ)	\$398.66	99	11,764
Knight Training: Book One of the Steam Knight Saga (http://www.amazon.com/dp/B07FLHY8YP)	\$267.36	519	19,735
Guard Training: Book Two of The Steam Knight Saga (http://www.amazon.com/dp/B071CXCZCB)	\$182.59	79	5,961
Spy Training: Book Three of The Steam Knight Saga (http://www.amazon.com/dp/B07SF5LZKZ)	\$104.43	44	3,877