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out of a coordinated, repulsive, threatening campaign of anti-Semitic harassment directed at Tanya Gersh, a Jewish real estate agent living in Whitefish, Montana.

2. 7 K L V W H U U R U F D P S D Q J Q W R I Q R Z Q Z D W O D 3 X Q L F R K

Andrew Anglin, a well-known neo-Nazi operating out of Ohio.

3. Mr. Anglin publishes the *Daily Stormer*, a neo-Nazi web site with hundreds of thousands of visitors each month that takes its name from the infamous anti-Semitic Nazi paper *Der Stürmer*. The *Daily Stormer* has become notorious for terrorizing individuals through similar campaigns in the past.

4. Mr. Anglin turned his horde of anti-Semitic fanatics loose on Ms. Gersh in a series of *Daily Stormer* articles he started publishing in December 2016. These articles caused his followers to overwhelm Ms. Gersh with hundreds of hateful and threatening anti-Semitic phone calls, voicemails, text messages, emails, letters, social media comments, and false online business reviews.

5. Mr. Anglin made his initial call to arms in a December 16, 2016

forums where the followers could trade ideas and information for carrying out the harassment.

7. ³-XVW PDNH \RXU RSLQLRQV NQRZQ 7HOO W Jew agenda . . . 'Mr. Anglin urged in his December 16, 2016 article. ³7KLV LV YHU\ important. Calling these people up and/or sending them a quick message is very easy. It is very important that we make them feel the kind of pressure they are PDNLQJ XV IHHO '

8. Mr. Anglin even urged his followers to seek Ms. Gersh out in person:
³\$QG KH\

11. These communications contained countless slurs and threats designed to inflict maximum emotional damage on Ms. Gersh. [O]ven-dodging Christ N LOOHU ' 3:RUWKOHVV IXFN appeared among scores of 3 VOLP\ I other repugnant epithets.

12. This tsunami of threats arrived by email, social media, and voicemail: 3:H DUH JRLQJ WR UXL [Qecr of Xhit]\R. You will be driven to the brink of suicide. & We will be there to take pleasure in your pain & eventual H Q G nidentified individuals threatened 3 7 KLV LV WKH JR\ODVK <RX ODVW JR\ODVK GRIQ\$V WRDXF HIGQFD L'PLQDOV ZKR SO WR JHW WKURZQ LQ WKH RYHQ '

13. To PD[LPL]H WKH WUROO VWRUP\$VWVWHUURUL] Anglin and his followers even targeted her twelve-year-old son. Mr. Anglin called KLP D 3VFD PPLQJ OLWWOH NLN H H D Q G D 3 2 0 1 6 H H S \ O article. Then 0 U \$ Q J O L W O R \$, acting at his urging, harassed 0 V * H U V K ¶ V son with comments on his Twitter feed ask your mommy why she hates white SHRSOH VR P X F K D Q G U X A Q W i t t e r U s e r w i t h t h e h a n d l e 3 . D L V H U : L O K H O P of an anti-Semitic German emperor, tagged Ms. * H U V K ¶ V V R O a t l e a d D 3 S W Z H M W M L G W K H U H V D I U H H ; E R [oven[.] 'The tweet included a photograph of an oven.

14. Mr. Anglin and his followers targeted Ms. Gersh ¶ V K X, as EWDIQ G
Mr. Gersh received many threatening, hateful, and harassing phone calls,
voicemails, false online review

to Mr. Spencer, considered protesting in front of a mixed-use commercial building Ms. Spencer owns on Lupfer Avenue in downtown Whitefish.

18. When members of the community approached Ms. Gersh (one of the few Jewish residents of Whitefish) about the possible protests, she and others contacted the EXLO Commercial tenants to warn them that a protest might occur outside the Lupfer Avenue building.

19. One of these tenants asked Ms. Gersh to call Ms. Spencer. Ms. Gersh declined at first, then reluctantly agreed to consider accepting a call from Ms.

-0.03 1 1661 0 0 1 356.9.66 TmlBT1 BT1 0 0 1 325.25 610.31pJET EMC /P /MCID 234.7-34.

23. Over the Thanksgiving holiday, however, Ms. Spencer apparently began to get cold feet. Ms. Spencer emailed Ms. Gersh asking to proceed with the sale independently, without assistance from Ms. Gersh.

24. Ms. Gersh agreed, and forwarded contact information for several other real estate agents who could help Ms. Spencer sell her building. These emails were the last communication between Ms. Spencer and Ms. Gersh.

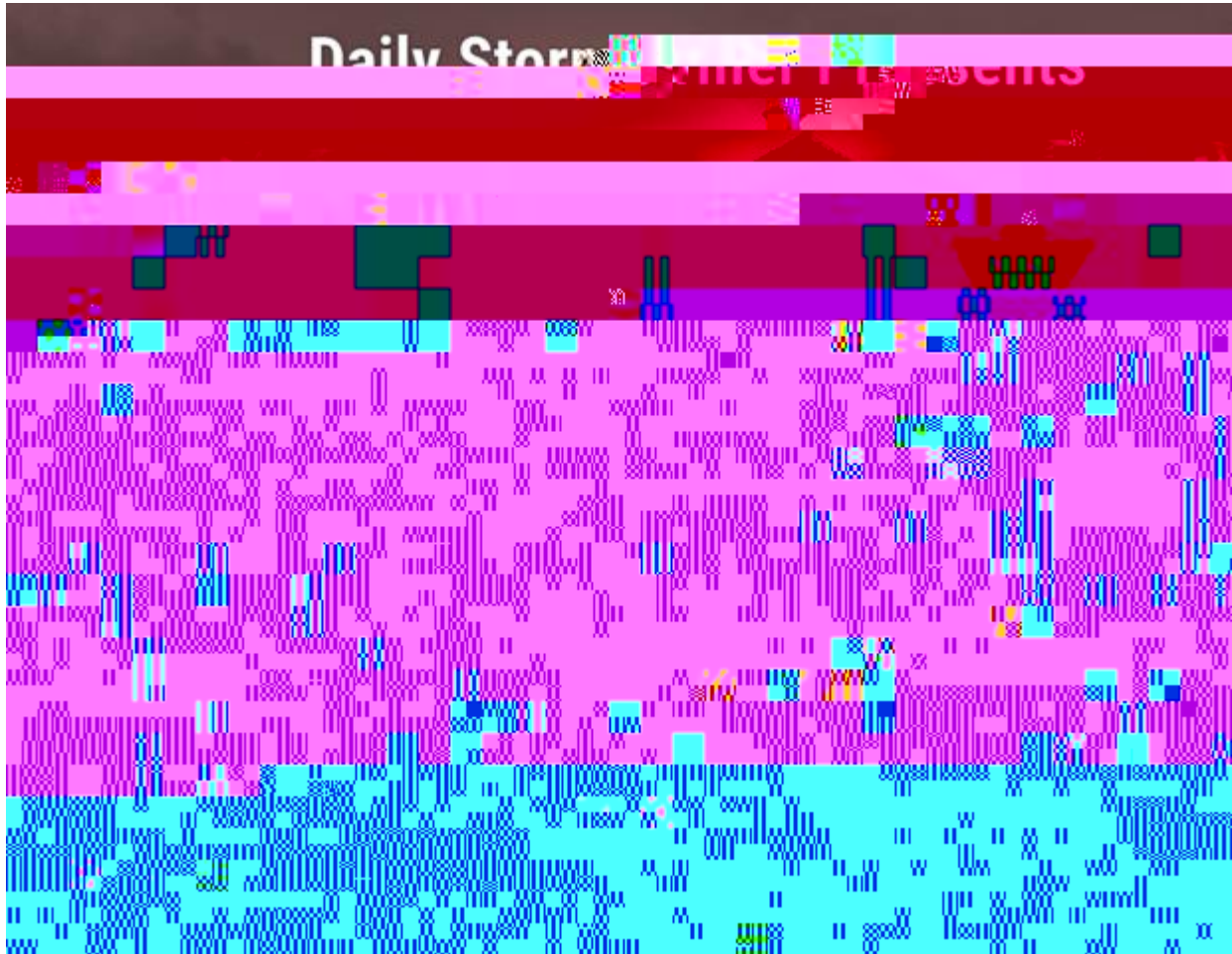
25. About two weeks later, and without any warning to Ms. Gersh, Ms. Spencer published a blog post on the website *Medium*. Ms. Spencer alleged in her post that Ms. Gersh had tried to threaten and extort her into agreeing to sell her

EXLOG LQJ PDNLQJ D GRQDWLRQ. DQG GHQRXQFLQ

26. The day DIWHU 0V ~~Ms. Gersh's~~ ~~Medium~~ post, Mr. Anglin began posting articles on the *Daily Stormer* parroting Ms. 6SHQFHU ¶V DOOHJDWLRQV D Gersh and calling for a troll storm against her. This first post by Mr. Anglin immediately triggered the deluge of threatening, hateful, and harassing communications Ms. Gersh has endured.

27. Since launching the troll storm, Mr. Anglin has stoked the fire continuously by publishing new articles on the *Daily Stormer* about Ms. Gersh or referencing Whitefish. As of the date of this filing, Mr. Anglin has published thirty such articles, the majority of which urge his readers to continue their harassment of Ms. Gersh and her family and associates.

28. This ongoing campaign of terror has included threatening and hateful images of Ms. Gersh, even including this image of her along with her twelve-year-old son and two other members of the Whitefish Jewish community superimposed on a photograph of the Auschwitz concentration camp:



29. Ms. Gersh has experienced serious and severe emotional and physical distress as a result of the harassment, for which she has received medical treatment. Ms. Gersh has had panic attacks, goes to bed in tears, wakes up crying, startles

III. Parties

36. Plaintiff Tanya Gersh is a resident of Whitefish, Montana, and has lived there for over twenty years.

37. Ms. Gersh is Jewish and is married to a Jewish man. She and her husband have raised their two children in the Jewish faith.

38. Ms. Gersh began selling real estate three years ago, after a long career as a wedding planner.

39. Defendant Andrew Anglin is a resident of Ohio.

40. Mr. Anglin is the founder and editor of a neo-Nazi website called the *Daily Stormer*, which appears at www.dailystormer.com.

IV. Factual Allegations

A. Sherry Spencer

41. Sherry Spencer is the mother

44. 13, DLPV 3WR HOHYDWH WKH FRQVFLRXVQH

biological and cultural continuity, and protect our civil rights. . . . [NPI] will study

50. Some residents protested in front of 22 Lupfer around the time of the building permit application, as the application and Richard 6 SHQFHUV ¶ V UDFLVW were common knowledge in Whitefish.

D. 7KH 6SHQFHUV ¶ 5HODWLRQVKLS ZLWK

51. Several vocal white nationalists who moved from other locations now live in Whitefish and the surrounding areas, although Whitefish does not itself have any history of local anti-Semitism.

52. In response to growing concerns about the possibility of an influx of white nationalists in the region, and in order to demonstrate its united opposition to the discriminatory white nationalist message espoused by these vocal few, the Whitefish community has repeatedly and publicly reinforced its commitment to treating all res

Spencers. The board of the symphony asked Ms. Spencer to resign and returned her donation to her. The Wildlife Conservancy rescinded its invitation to her, and the musical school dissolved its advisory committee in part to end its affiliation with Ms. Spencer.

E. Protest Rumors

55. Community discontent with the Spencers J U H Z D V 5 L F K D U G 6 S H
profile expanded to a national stage.

56.

advice. Later, the tenant called again asking Ms. Gersh to call Ms. Spencer, who wanted to talk to Ms. Gersh, according to the tenant.

60. Ms. Gersh initially rejected the idea, then reluctantly agreed to at least consider accepting a call from Ms. Spencer, thinking it unlikely that Ms. Spencer actually would call.

F. 0V 6SHQFHU¶V &DOO

61. A few minutes later, Ms. Spencer did call Ms. Gersh, essentially
D V N L Q J ³ : K D W Q G R ³ + G R " V K R X O G , K D Q G O H W K L V " ´

62. During the call, Ms. Spencer lamented the grief her building had caused in the community from the very beginning, leading Ms. Gersh to wonder aloud why Ms. Spencer was keeping the building. Ms. Gersh said that if she were
L Q 0 V 6 S H Q F H U ¶ V V L W X D W L R Q V K H P L J K W V H O O K
make a public statement.

63. Ms. Spencer apparently liked these ideas and implored Ms. Gersh to be the realtor. ³ , V W K D W V R P H W K L Q J \ R X Z R X O G K H O S P H

64. Ms. Spencer gave Ms. Gersh an access code to the building. HUANE h54a2.7ETBT/F1 14

65. Ms. Spencer also asked Ms. Gersh for assistance drafting a press release DERXW WKH VDOH DQG DERXWKHU UHMHFWLRQ

66. Ms. Gersh felt tremendous relief after taking the call from Ms. Spencer. Ms. Gersh felt that, assuming that all went well, she had been able to help avert what might have been a difficult and disruptive conflict in her community. She felt as if she had defused a bomb.

67. Ms. Gersh called a president of her realty company to ask permission to charge Ms. Spencer a reduced commission, and the president agreed. Ms. Gersh made plans to donate her portion of this reduced commission to a community organization and said as much in an email to Ms. Spencer.

68. Ms. Gersh SHUVRQDOO\ QRWLILHG VRADU R I 0 V 63 the potential resolution. Ms. Gersh also shared this information through Facebook hoping to quell discussions of boycotts or protests.

G. 0 V 6 S H O Change of Heart

71. Ms. Spencer expressed interest in proceeding independentl

74. Two weeks of silence later, on December 15, 2016, Ms. Spencer published a blog post on the website *Medium* in which she accused Ms. Gersh of threatening and harassing her into agreeing to sell the

I. OU \$QJOLQ¶V , QYROYPHQW

80. Mr. Anglin posted the first in a series of thirty articles related to Ms. Gersh on his website, the *Daily Stormer*, WLWOHG³-HZV 7DUJHWLQJ 5 Mother for Harassment and Extortion ±7\$. (\$ & 7 , 2 on December 16, 2016² WKH GD\ DIWHU ~~Media~~ ^{6SHQFHU¶V}

81. The article published contact information for Ms. Gersh and members RI KHU IDPLO\ DQG H[KRUWHG UHDGHUV WR FRQW sickened by their Jew agenda . . . ´

82. Mr. Anglin attacked Ms. Gersh, accusing her of engag LQJ LQ³FOHDU DQG REYLRXV H[WRUWLRQ 7KH\ DUH VD\LQJ µJLYH continue this campaign of terror against you and your family. ¶

83. Mr. Anglin also accused Ms. Gersh RI³WU\LQJ WR VLOHQFH 6SHQFHU E\ KDUDVVLQJ KLV PRWKHU ´

84. Mr. An JOLQ HQFRXUDJHG UHDGHUV WR FDOO 0 you think. And hey ±LI \RX¶UH LQ WKH DUHD PD\EH \RX VKR person what you think of her actions[.] ´

85. Mr. Anglin SXEOLVKHG 0V *HUVK¶V FHOOSKRQH fo U WKH RIILFH RI 0V *HUVK¶V KXVEDQG

86. OU \$QJOLQ HQFRXUDJHG UHDGHUV WR³OHD Google, and perhaps note that it is [a] IURQW IRU DQ H[WRUWLRQ UDF

87. Mr. Anglin included an image of Ms. Gersh in front of a fireplace

VXSHULPSRVHG ZLWK D \HOORZ 6W,DCURIDYLG EHD

³-HZZLWK D QRWH WKDW VKQW³SRQGM WOXW SLFV R

particularly disturbed by this picture because it seemed to have been carefully selected for its imagery ² a Jew next to a blazing fire, reminiscent of Holocaust atrocities.

88. Mr. Anglin also published the Twitter handle RI 0V *HUVK¶V WZH

year-old son

91. Mr. Anglin told read H U V ³ / H W ¶ V.] \$ LUM (¶ D8CSO U H D G \ I R
old fashioned Troll Storm? Because AYO ± L W ¶ V W K I D W W Q U H \$ Q J O L Q W
readers, ¶ M]ake

h) ³<RX DQG \RXU VD\DQLP UHDOO\ ING XS WKL

have a field day with you scumbags..If I was you I would suck the barrel of a shotgun or run to that shithole in the desert you fkn animals stole from the Arabs...We are going to keep track of you for the rest of your life and alert any and all ppl you come into contact with of how much of a piece of shit you are...Please do us all a favor and commit

VXLFLGH \$JDLQ ORO´

i) ³SOHDVH JR IXFN DYQHL ZKDW HD SH ROS OH DORQH

\RX ZH w@r you, nothing you do is good You don't get no

juice unless\RX VTXHHJH /HPRQ 2EULHQ WKH 7KL

j) ³<RX DUH D GLVJXVWLQJ YLOH -HvZr <RX ILC

OHDUQ LW L v@r your responsibility or your resentment of

you, which pales in comparison to your hatred for us. You are too

hateful & psychotic a people to belong anywhere but among your

wretched selves. America is changing at a viral pace & thousands of

Goys are learning of your true nature by the day. Leave Sherry

Spencer & the rest of us alone. As for anti-wish attitudes, deal with

it! YoX UHDS ZKDW \RX tv@r Za fu@k@bu ZydurGRQ ¶

feeOLQJV 7KLV LV 285H FFRMLQVU\OLRXQJ KHUH

k) 3* HUVK \RX VOLP\ MHZHVV GR \RX KRQHVV
ZRPDQ WR VHOO KHU SURSHUW\ IRU μWKH O
PDQDJH¶ E\ WKUHDWHQLQJ WR ~~Edops~~ LQ \RX

In the age of social media? You'd better lawyer up, ~~like~~ ~~be~~ going

to have your realHVWDWH OLFHQVH RYHU WKLV ´

l) 37KH GD\V RI -HZV SXVKLQJ JR\LP DURXQG D

close. I saw the mendacious articles in the lugenpresse today. Oh

come now, surely you Jews can hit harder than that! Merry Christmas,

& KULVW NLOOHU ´

95. Ms. Gersh received emails through work email accounts, as well, including the following:

- a) 3' HDWK WR ~~Th~~Tanya. Death to Tanya.

' HDWK WR ~~Th~~Tanya. ~~7DQ~~ DV DJH FDPH IURP, 36DWDQ < F

UHDFKDEOH E\ HPDLO WR 36DWDQ#666GHDWK

b) 3<RX KDYH QR LGHD ZKDW \RX DUH GRLQJ V
EHJLQTH This message came from a user with the name 3) XFN <RX
.LNH' the one DGOLO DGGUHV V 3\RXIXFNL'QJNLNH#KR

c) 3:H VHH WKDW QHVRVHRU G WUSXUNHZNW W DQG
know your a bunch of sayanim freaks... Make Aliyah ~~you~~
%ROVKHYLN SFVHRFRVPLQW ' :H¶

d) 3) 8 & . < 2 8 ´

e) 3'R \RX Walya Gosh and that disgusting pack of Talmudic
freaks who work at PureWest Real Estate are going to get away with
terrorizing Americans?...We shall see what will become of

3XUH:HVW 5HDO (VWDWH LQ WKH FRPLQJ \I

f) 37DQ\D *HUVK LV D Should Warrent Real Estate Wcents
stripped from her. Disgusting anti american thug. Extorting property
DQG PRQH\ IURP 6KHUU\ 6SHQFHU 'LVJXVWL

g) 37DQ\D *HUVK LV D GLVJXVWLQJ WKXJ WKDW
because of their politcal beliefs. What an DPHULFDQ ZKRUH ´

96. Some messages that Ms. Gersh received through her work email account DV D UHVXOW RI 0U were copied to her colleagues and W R U P were

e) ³, Q R W L F Hing Pa XeaDduwhXs trying to have my mother murdered, financially, and by giving her location to a wide public venue, so the same people behind Black Lives Matter can hunt her down and kill her like they do police. Please inquire diligently as to why Ms. Gersh feels she is so omnipotent that she can bully my mother into selling a property using threats of gangs of violent protestors to lower her property values? Six million thanks for your F R R S H U T D i s m e s s a g e was sent by someone claiming to be Richard Spencer.

Harassment Ms. Gersh Received Phone Calls

97. Ms. Gersh answered her phone several times before she realized what was happening and was subjected to vile threats. She stopped answering her phone altogether because caller ID showed it to be a caller she knew and still does not answer unknown calls.

98. 2 Q H F D O O H U V D L G ³ < R X V K R X O G K D Y H G L H C R I \ R X U S H R S O H '

99. The calls that most disturbed Ms. Gersh consisted only of the sound of guns being fired.

fucNLQJ SLHFH RI VKLW 2K ZDLW LW¶V RN ZK
LQWHUHVWV ULJKW" ,VQ¶W WKDW WKH ULJK

i) ¶Hello this is Chris. Um I wanted to talk to you about a medium sized
UHVRUW WRZQ ,W¶V LQ 0RUKWJEDSh kike. NLOO
Alright. Thank you.´

j) ¶When are you going to move your kike ass to Tel Aviv and start
managingbrothelsthere?´

k) ¶<RX IXFNLQJ ILOWK\ NLNH ZKRUH 'RQ¶W \R
7UXPS¶V \$PHULFD QRZ

l) ¶Oh hi there Tanya. I wanted to letyou know that I find what you did
to Sherry Spencer to be vile and disgusting, you rank bitch. You
fucking people, to say that you engage in this kind of blackmail
against this sweet woman who had nothing to do with the politics of
Richard Spencer you vileant, so burn in hell Sherry. Or Tanya.
Tanya Gersh. Yeah. You are a disgusting vile human being. Let that
be known. Thank you.´

m) ¶<RX DUH D KRUULEOH QDVW\ KXPdq EHLQJ
night. I hope you get call after call after call that tells how terrible
of a person you are.´

PUBLICLY like a decent citizen to Sherry Spencer for being a poor real estate

D J H Q W '

104. \$ Q R W K H U S R V W F D U G L L e f f o n X b o n i n G h e l l (t h a t @ K H - H 2
L Q F O X G H V \ R X O D G \ ' 3

105. Ms. Gersh also received packets of tourist information for different
states (Kansas, Arkansas, and 1 H E U D V N D D O O D G G U H V V H G W R 3
Gershberg D W 0 V * H U V K ¶ V p r e s R P a b l y 3 @ e s u l t H b / W r . A n g l i n ¶ V
troll storm.

Harassment Ms. Gersh Received Christmas Cards

106. Ms. Gersh received several malicious Christmas cards

107. One card postmarked December 24, 2016, R U H W K H P H V V D J H
happy Christmas to you and W K R V H \ R t h e W O R L D Christmas was
underlined twice in red ink and accompanied by an explanatory with more
underlining 3 E H F D X V H \$ C h r i s t i a h F a d o n S O R R Y ! Y O U H A V E
ISRAEL. 'The sender also hand U R D e a r T a n y a , I r e a l i z e t h a t a s a J e w y o u r
ancestors have zero traditions of free speech beyotne shtetl, but Americans
(whose greatgreatgrandparents Z H U B o s t o n W i k C o m m u n i s t) would greatly
appreciate if

included an altered image of Ms. Gersh being sprayed with a cloud of green gas.

j) 37KDQNV IRU GHPRQVWUDWLQJ ZK\ \RXU UDF
RYHQHG '

k)

114. Ms. Gersh removed her wedding planner profiles from popular wedding websites, including theknot.com, DV D UHVXOW RI 0U \$QJOLQ

115. \$V D UHVXOW RI 0U \$@b0eLp0fshWU ROO VWRL fabrication about Ms. Gersh on a website called theahomewrecker.com suggesting that Ms. Gersh lured DQRWKHU ZRPDQ ¶V KXVEDQG WR

116. Ms. Gersh also received subscription notices for flight news media that individuals had maliciously signed up for using her email address as a result of 0U \$QJOLQ ¶, as well as password reset requests showing that individuals were trying to hack into her accounts

117. Ms. Gersh received hateful comments through her realtor profile on the websites sealtor.com and zillow.com DV D UHVXOW RI 0U \$QJOLQ ¶

Harassment Husband of Ms Gersh Received Emails

118. In his effort to terrorize Ms. Gersh, Mr. Anglin targeted her husband as well. Mr. Gersh received numerous threatening, hateful, and harassing emails about her, including the following

a) ³ 3 X W \ R X U X S S L W \ V O X W Z L I H 7 f d e k k e . E D F N L

Tell your scamming son [name omitted] to kill himself, too. Day of

W K H U R S H V R R Q I R U \ R X U H Q W L U H I D P L O \

g) 3 < R X U M H Z L V K V X S U H P D F \ K D V Q R P R U H E X V

We are awake and on to your subversive and tribal nationalism.

Millions have been affected by your sick supremacist ~~and~~ we

had enough. The more you lash out with your hate of Christians, the

more you arouse suspicions of your intent. Keep it up and ~~you~~

find no one willing to stop what your bringing on to yourselves.

Christians had enough jewish hate, its time for you R O H D Y H

h) 3 < R X U W U H D W P H Q W R in the Fishbowl of Society U ¶

It just shows you that Jews are sociopaths, trying to ruin someone

I L Q D Q F L D O O \ E H F D X V H W K H \ G L V D J U H H Z L W

i) 3 : K H Q Z L O O \ R X U s i n g U X P G E H K G H U P K V I R U K L V I D F

involvement in the criminal activity of extorting Whitefish

residents?...We will destroy ALL your reputations for YEARS to

come in a relentless attack on everything X W R X F e , I \ R X ¶

V P D U W ' L W F K * H U V K '

Harassment Husband of Ms Gersh Received Voicemails

119. Voicemails that Mr. Gersh received included the following

statements:

a) 3 < R X N Q R Z L W U H D O O \ L U N V P \ I H F H V W K D W

can josh our people any you know G R W K H G D P D J H \ R X ¶ U H

business is going to go down. So, you know, get the fucking clue. You

IXFNLQJ -HZ PRWKHUIXFNHU \RX ´

e) ³+L 7DQ ,I \RX DUH PHVVLQJ ZLWK 5LFKDUG 6

VKRXOG UHDOO\ VWRS %HFDXVH LI \RX RZQ

start this war with the internet. The internet will win. The intte 1 136.94EeF 0

Harassment Son of Ms. Gersh Received Social Media

122. Mr. Anglin presumably knew that there is no surer way to traumatize a mother than to harass and threaten one of her children, and this is exactly what he did. He targeted [Name omitted] and encouraged his followers to do so as well, resulting in numerous harassing tweets, including the following

- a) 3 > \$ @ VN \RXU PRPP\ ZK\ VKH KDWHV ZKLWH S
H[WRUWLRQ UDFNHW '
- b) [Name omitted] , VDZ XU PRP NLVVLQJ VRPH JX\ Z
LQVLGH &DVH\ [Name omitted] WKH RWKLHW" 'GD\ \$VN XU P
- c) [Name omitted] your mother is going to get sued and lose
HYHU\WKLQJ 3OHDVH SXW KHU EDFN LQ WK
- d) 3GLG \RXU UDEEL GR WKLV WR \RX" ' 7KH XV
DUWLFOH ZLWK WKH KHDGOLCER [Name omitted] 6XFNL
)RUHVNLQ ,V +HUHV\ +DUHGL 5DEEL 6D\V '
- e) 3.HHS D OHDVK RQ \R PDPD '
- f) 3SVVW NLG WKHUH [Name omitted] D IUHH ;ER[2QH LQVL
an image of an oven
- g) 37HOO \RXU PRP WR VWRS ZLWK KHU YLFLRX
WTF is wrong with \RX IUHDNV" '

123. 0V *HUVK¶V VRQ UHFHLYHGokDbeDed/LQJ FRP
that he posted as well:ZKDW GR \RX WKLQN RI \RXU PRP KDU
6SHQFHU¶V HOGHUO\ PRWKHU DQG IRUFLQJ KHU WI
VD\ EHLQJ D ODZ\HU"´

124. The Gershes quickly decided to deactivate

128. Mr. Anglin continues ³ 7 KHUH ¶ V R Q O \ R Q H S O D F H W K L
Up the Pressure. Keep calling these people. Keep emailing them. Make it known to
W K H P W K D W W K H M L J L V R I I L F L D O O \ X S : H D U H Q ¶ V
list of contact L Q I R U P D W L R Q L V L Q P \ O D V W S R V W * R G R
the first article he published about Ms. Gersh on December 16, 2016

L. 0 U \$ Q J O L Q ¶ V & R Q W L Q X H G 3 R V W V

129. Mr. Anglin has continued to publish articles about or relating to Ms.
Gersh.

December 19, 2016 Article

130. Mr. Anglin repeated his erroneous tale about Ms. Gersh for a third
time and again encouraged his readers to contact Ms. Gersh December 19
2016 article titled ³ / \ L Q J - H Z 0 H G L D 6 D \ V ' D L O \ 6 W R U P H U µ 7
Racketeers Extort ¶ Q J W K H 6 S H Q F H U) D P L O \ ´ Z U L W L Q J ³ : H Z
on these Jews, Tanya Gersh in particular, until they stop harassing the Spencers
and issue an apology for this brutal Jewish racketeering. Tm [(u)4(b)4(l)-3(i)329.063g tu

their actions, and ask that they cut their business ties with the Jews engaged in this

F D P S D L J Q R I K D U D V V P H Q W D Q G H [W R U W L R Q D J D L Q

December 21, 2016 Articles

132. Mr. Anglin repeated his extortion tale about Ms. Gersh for a fourth time in a December 21, 2016 article.

133. Mr. Anglin also advocated confrontation ~~with~~ this D U W L F O H Z U L W L Q with all terrorism, whenever you pay the ransom, they keep doing it, the only thing that will stop this madness is through direct (and fully within the confines of the

O D Z F R Q I U R Q W D W L R Q

134. Mr. Anglin posted additional hateful content designed to stoke his followers' bile and emotionally harm Ms. Gersh in a second article published December 21, 2016

135. Mr. Anglin wrote in this second article ³, F D Q D O V R S K R W R V K of your face and that of your scamming spammer rat son onto Nazi propaganda

S R V W H U V I U R P W K H V 1 R R Q H F D Q V W R S P H I U F

& R Q V W L a n d i n t h e f o l l o w i n g i m a g e o f M s . G e r s h a n d h e r s o n superimposed onto a Nazi propaganda poster

December 22 2016 Articles

138. 0U \$QJOLQ H[KRUWHG UH DGHUV WR 3FDWFK
 752//67250' LQ D 'H, 2016 Article He then published the contact
 information IRU 0V *HUVK ¶ Voters With Whom I'm Associated

139. 0U \$QJOLQ FRPPDQG HG 3*(772,7,I \RX DU
 WKH FDXVH \RX ZLOO PDNH WLPH WR FRQWDFW DC
 busy. Trust me, I know about busy. This is so, so important. We have to stand
 up to these people, and we have to force away from Tanya Gersh. . So, if
 \RX GRQ ¶ W KDYH WLPH PDNH WLPH & DOO DQG HP
 QRZ '

140. Apparently believing that a disclaimer would exculpate him, Mr.
 \$QJOLQ ZURWH 3\$1' \$6 \$/:\$<6 \$%62/87(/< 12 7+5(\$
 VIOLENCE, SUGGESTIONS OF VIOLENCE OR ACTS OF VIOLENCE.
 '21 ¶ 7 '2 ¶ JUST GIVES THEM POWER. THEY ARE ALREADY
 CLAIMING THEY ARE GETTING DEATH THREATS, WHILE THE LOCAL
 POLICE AND THE FBI ARE DENYING IT AND THIS MAKES THEM LOOK
 6783,' .((3 (9(5<7+,1* 21 7+(/(9(/ '

141. The next sentence in the article begins FODLP 3)RU WKH QH[V
 of our plan against Jew Gersh and Jew Love Lives Here, we are planning an armed
 protest in Whitefish.

142. Moreover, Ms. Gersh received a threatening email that very day
 3 / HDYH : KLWHILVK OHDYH 0RQWDQD & KDQJH \RXU
 'RQ W OHW PH VHH \RXU IDFH RU Zim Fedialky, ZLOO V
 PH ZKHQ WKH\ JH This PHP D/L (\$9 ZDV VLJQH GM.\$ \$ ' WKH I
 Anglin used to sign D Q HGLWRU V QRW HDLQSDrm) Hficle XDU\

143. After discussing logistics of the armed protest, Mr. Anglin posted an
 image of Ms. Gersh, her son, and two other Jewish residents Whitefish at
 Auschwitz concentration camp similar to the image featured above

December 23, 2016 Articles

144. Mr. Anglin claimed that Love Lives Here, an anti-hate group in
 : KLWHILVK ZDV 3 WKURZLQJ 7 D Qs Decmber 23, 2016 GHU W
 article, 3 : + , 7 () , 6 + * \$ 0 (& + \$ 1 * (5 / RYH / LYHV + HUH 7KURZ
 8 QGHU We even though Love Lives Here continuously supported the Gershes
 DQG RWKHU YLFWLPV RI 0U \$QJOLQ V WUROO VWR

145. Mr. Anglin then encouraged his readers to contact businesses and
 organizations associated with Ms. Gersh ZULWLQJ 3 (DUOLHU WRGD\ ,
 post with contact information for business contacts of the racketeers and their
 VXSSRUWHUV * 2 & 217 \$ & 7 7 + (6 (3 (23 / (12 : , I WKH\ C
 phone, email them or contact them through Twitter . . . '

146. Mr. Anglin again included the altered photograph of Ms. Gersh, her son, and two other Jewish residents of Whitefish in the Auschwitz concentration camp this time with a red filter

147. Mr. Anglin published two other articles on December 23, 2016 that referenced Whitefish

148. In the first, Mr. Anglin attributed a school bus crash in Whitefish to

149. In the second, the article published by Mr. Anglin claimed that in Montana, Whitefish are . . . persecuted and linked to the December, 2016 article featuring an image of Ms. Gersh and her sons superimposed on a Nazi propaganda poster.

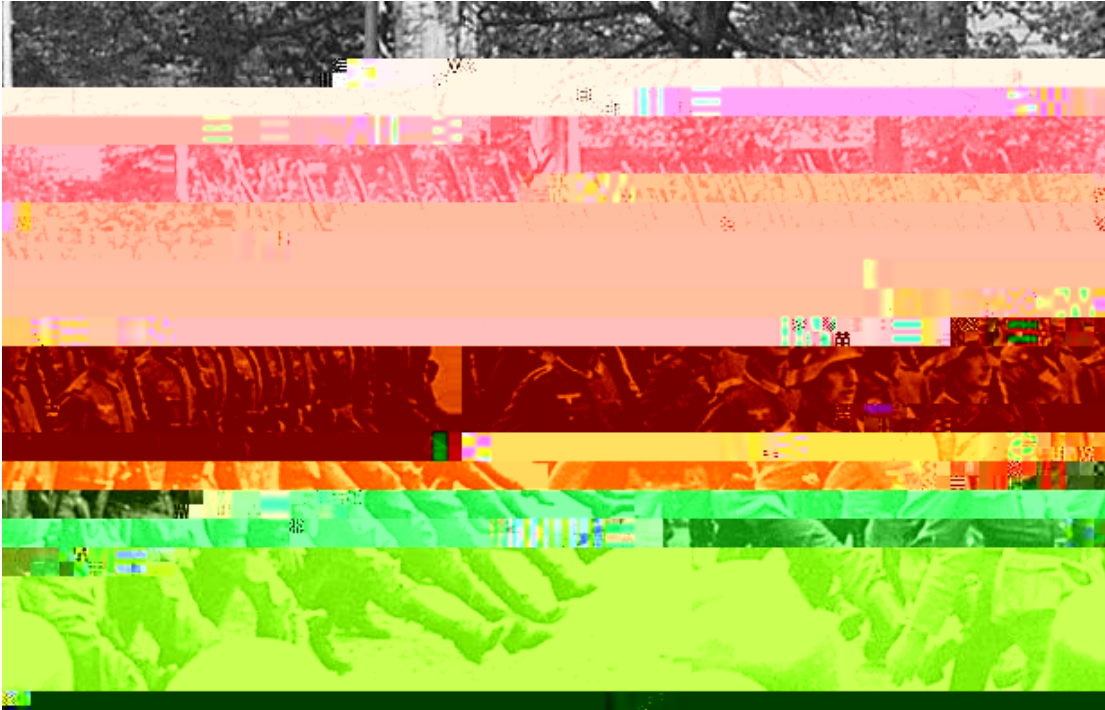
December 26, 2016 Article

150. Readers were encouraged to listen to Richard Spencer's radio appearance on the David Duke Show in which Spencer speaks about Ms. Gersh in



164. 0U \$QJOLQ SRVWHG D FOLS RI WKH VRQJ 3%
 film The Lion King DQG ZURWH 3\$QG WKH\ ZLODUNDH WKH
 skinhead AltRight Nazis marching with a guy from Hamas carrying machine guns
 WKURXJK WKH FHQWHU RI WKHLU WRZQ '

165. Mr. Anglin concludedhis article withaphotographof armed Nazis
 marching



January 6, 2017 Article

166. The story about Ms. Gerstein harassing Ms. Spencer was posted on the Daily Stormer for theseventh time in a January 6, 2017 article

summarizing the Alt-Right activity Harassment and extortion of

5 LFKDUG 6 SHQFHU ¶ V PRWKHU E\ - HZLVK DFWLYLVW

WR EH PDGH 0RQWDQD UHDOWRU 7DQ\D *HUVK

mother do the following: 1. Denounce her son (as opposed to just disavowing his

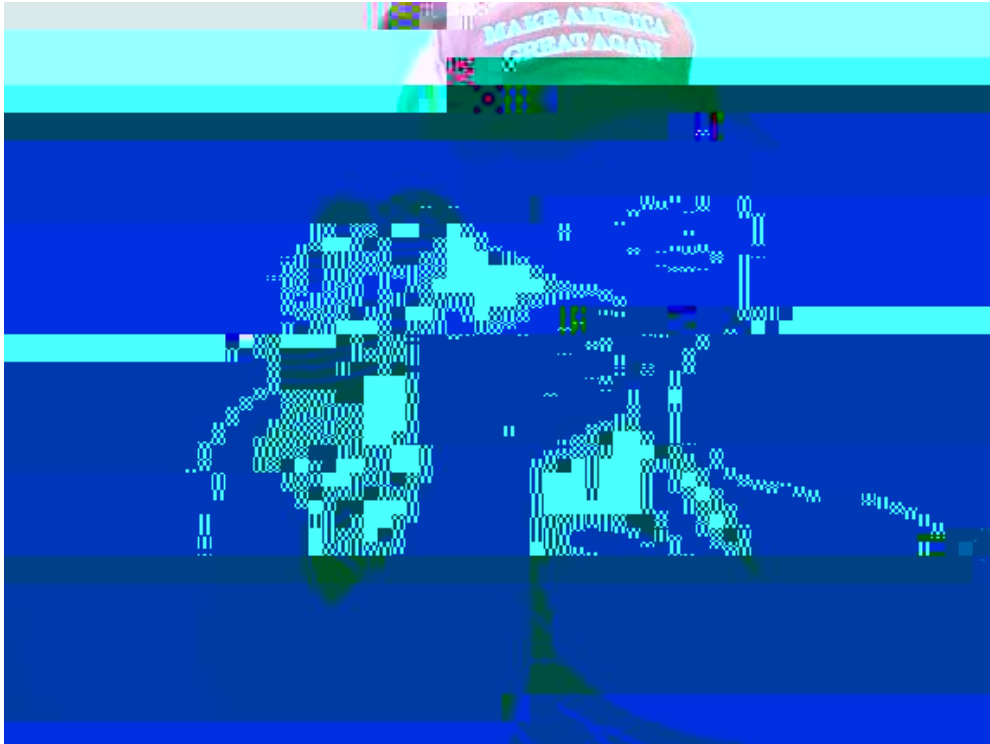
beliefs, which she did) 2. Sell the building and make G R Q D W L R Q WR K X P D

H I I R U W V ¶ D I W H U W K U H D W H Q L Q J WR R U J D Q L J H S U R

O R Z H U L W V Y D O X H

167. White nationalists use triple parentheses to signify that a name belongs to a Jewish person.

168. The article opened with an image of Donald Trump hugging Pepe the frog, an alright meme:



January 8, 2017 Articles

169. The story about Ms. Gersh was repeated in the Daily Stormer for the eighth time in a January 8, 2017 article, in which the planned actions of the Jewish Defense League, a radical organization, which was illegally harassed by Jewish racketeers.

170. They are biologically incapable of admitting that their people could ever be at fault

for something. If these Jews actually do end up visiting Whitefish to stir up trouble, it will only further highlight the disgusting and degenerate behavior of the

- HZ WKDW P X F K P R U H '

171. Mr. Anglin posted a second article that day denigrating the World Jewish Congress President ~~DeW~~ 5 R Q D O G 6 / D X G H U I R U G H P D Q G L Q
Montana immediately put a stop to an armed march being planned by ~~Nazis~~ in

W K H W R Z Q R I : K L W H I L V K R Q - D Q X D U \ '

172. Mr. Anglin falsely claimed in this article ~~W K D W~~ 0 V * H U V K K D G :
litigation against ~~D L Q V W~~ K H U I R U K H U U D F N H W H H U L Q J D F W L Y L

173. Mr. Anglin ~~Z U R W H~~ W K D W K H Z D V L Q F R J E W P X Q L F D W
comrades in Hamas, as we prepare to join hands in Whitefish and march against

W K H - H Z V D Q G \ R X M X V W F D Q ¶ W H Y e d e a l e n g w o l H Y H Z I
R Y H U W K H U H ' (O D E R U D W L Q J 0 U \$ Q J O L Q Z U R W H

around killing babies left and right! They took their land! Just went ahead and straight jacked it! Can you believe it??? ~~Wonder~~ W K H \ ¶ U H V R D Q J U \ '

174. Mr. Anglin reiterated his interest in the armed protest, sharing a quote

I U R P W K H : K L W H I L V K S R O L F H F K L H I L Q D P D L Q V W U
V H H P V O L N H D S U H W W \ F R R O J X \ D Q G , G R Q ¶ W W K
R X U Z H D S R Q V / 2 \$ ' (' '

H[WUHPLVWV WR ZUHFN DQG H[WRUW PRQH\ IURP K
ORQWDQD DV D PHDQV RI VLOHQFLQJ 5LFKDUG¶V R

179. Readers were encouraged WR ³VKDUH > WKGHQ WHUYLHZ ©

180. In the interview, Richard Spence repeated the accusations he made
against Ms. Gersh in his December 26, 2016 interview with David Duke KHUH
was this nasty woman named Tanya Gersh, who was attempting to force my
mother to sell her property and to profit from it all by being a broker. It was just

D UHDOO\ WHUULEOH VLWXDWLRQ ´

181. 'DYL G 'XNH LQWHUMHFWHG ³:HOO VKH¶V WR
7DOPXG DQG WKH +DODFKD 7KDW¶V IRU VXUH ´

182. Richard Spence said ³, ¶P DIUDLG , DJUHH ZLWK \RX

183. David Duke recounted the extortion narrative Mr. Anglin continues to
promote ³<RXU PRWKHU ZKR KDV QR SROLWLFDO DVVR
GRHVQ¶W DJUHHRXQHDMVDDGID VWDWHPHQW VKH
politics, was targeted in an attempt to destroy her financially, her business,
and to basically, profit from it by a number to 60(n)-3(a)1-(her).(by)4-3(m)17(bt4m)13,(f3

created to defame good and well-meaning people who are trying to protect themselves and their kinfolk from the

195. Mr. Anglin denigrated all Jewish people as a diseased race of evil monsters, and it is they who deserve to be banned as a terrorist group. Their entire existence, going back all through their

KL VWRU \ KDV EHHQ D VHULHV RI WHUURULVW LQFI

196. Mr. Anglin posted a threatening image in this article



197. Mr. Anglin concluded this article with the statement + L W O H U Z D V U L J K W³ † DLOG9 L F W R U \

198. Mr. Anglin referenced Whitefish in another January 19, 2017 article
³7KH 'DLO\ 6WRUPHU ZDV DWWHPSWLQJ SHDFHIXO
when we were shut down by kikes. These people are terrorists. At least most of
WKHP DUH 3DLG ULRWHUV -HZV DQG RWKHU SV\FK

199. Mr. Anglin posted a third article on January 19, 2017, titled "Migrating Ms.
Gersh. Having received word that Jewish leaders from the U.S. and Canada met
with the Governor of Montana to thank him for speaking out against anti
Semitism, the article suggested that S U R Fox late and babyfellaio are flying
in from all over the place to Whitefish, Montana not for any just or noble cause,
but to provide cover for a member of the Keshar Nostra Tanya Gersh, who was
WU\LQJ WR H[WRUW WKH PRWK Hev R day 5nuFKaDutG 6SHG
-HZV WR EHJLQ ZLWK '

200. ³7KH SUREOHP LV WKDW WKHVH -HZV DUH IL
that no amount of criminal activity or lying can contain WKH DUW E,FWH EUDJ
thezeitgeist and no Tay Sachsoican will himself over this emerging historic
spirit. Their WULFNV DUHQ ¶W ZRUNLQJ DQ\PRUH '

February 3, 2017 Article

201. Mr. An JOLQ PHQWLRQH G :KLW attached to LaQ DQ HGL
article he published on the Daily Stormer on February 3, 2017, opposing the

ACLU: 3:KHQ WKH SXEOLVKHU RI WKLV ZHEVLWH HPDL
SURSRVHG PDUFK RQ :KLWHILVK WKH\ QHYHU UHS

202. 0U \$QJOLQ VLJQH GZ MWK 3\$\$ L`WRUV V QLRWL B OY

203. Ms. Gersh received harassing communications signed with the initials

3 \$\$`

M. Effects on Ms. Gersh

204. Ms. Gersh has experienced serious and severe emotional and physical
disWUHV V DV D UHVXOW RI 0U \$QJOLS On the Atti R O O V W
storm, she feels like a completely a different person than she was before Ms.

Gersh has experienced panic attacks, goes to bed in tears every night, wakes
up crying nearly every morning startles easily, feels anxiety and discomfort in
crowded places, has had trouble leaving her home, and fears answering her phone.

205. Ms. GeU V K ¶ V S K \ V L F D O sp± ...N hTäy ž` P € ð p K déæ¥

214. Mr. Anglin gave his followers substantial assistance in harassing Ms. Gersh by continually posting stories about, and posting contact information for Ms. Gersh, her family members, and her colleagues

215. Mr. Anglin gave his followers instruction and encouragement to harass Ms. Gersh by exhorting them to contact Ms. Gersh and by repeating false stories about Ms. Gersh and Jews generally to stoke their emotions.

216. The harm that Ms. Gersh experienced.

217. Mr. Anglin is liable to Ms. Gersh for an invasion of Ms. Gersh's privacy in an amount greater than \$75,000 to be determined at trial

VI. COUNT TWO

Intentional Infliction of Emotional Distress

218. Ms. Gersh incorporates into Count Two the allegations of the foregoing paragraphs.

219. The maximum emotional distress on Ms. Gersh

220. Mr. Anglin knew that serious and severe emotional distress to Ms. Gersh was certain or substantially certain to result from his conduct.

221. Mr. Anglin could reasonably foresee the consequences of his conduct and actually intended such consequences to occur

222. ~~0 U \$ Q J O L Q ¶ V F R Q G X F W~~ was extremely outrageous and went beyond all possible bounds of decency.

223. Ms. Gersh has experienced serious and severe emotional distress direct and proximate ~~re O W R I 0 U \$ Q J O L Q ¶ V F R Q G X F W~~

224. Mr. Anglin is liable to Ms. Gersh for the emotional distress caused in an amount greater than \$75,000 to be determined at trial.

VII. COUNT THREE

Montana Anti-Intimidation Act

225. Plaintiff incorporates into Count Three the allegations of the foregoing paragraphs.

226. Ms. Gersh was attempting to exercise her legally protected rights, including her free speech rights.

227. Ms. Gersh was injured, harassed, and aggrieved by the troll storm Mr. Anglin orchestrated against her

228. Many of the harassing communications constituted threats or intimidation giving rise to a civil cause of action pursuant to Mont. Code Ann. § 27-1-1503(2)

229. Mr. Anglin is liable to Ms. Gersh for violating the Montana Anti Intimidation Act in an amount greater than \$75,000 to be determined at trial

VIII. COUNT FOUR

Malice

230. Ms. Gersh incorporates into Count Four the allegations of the foregoing paragraphs.

231. ~~0 U \$ Q J O L Q~~ constitute actual malice within the meaning of Mont. Code Ann§ 27-1-221 entitling Ms. Gersh to punitive damages.

232. Punitive damages should be assessed against Mr. Anglin in order to punish and deter such intentional and malicious conduct.

IX. CLAIM FOR RELIEF

For the foregoing reasons, Plaintiff respectfully requests that the Court grant the following relief:

A.

X. JURY DEMAND