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UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION

TANYA GERSH,

Plaintiff,

vs.

ANDREW ANGLIN, publisher of
the *Daily Stormer*,

Defendant.

Case No.:

COMPLAINT FOR INVASION OF
PRIVACY, INTENTIONAL
INFLICTION OF EMOTIONAL
DISTRESS, AND VIOLATIONS OF
THE ANTI-INTIMIDATION ACT

JURY DEMAND

I. Introduction

1. This case asserts claims for invasion of privacy, intentional infliction of emotional distress, and violations of Montana's Anti-Intimidation Act arising

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. This terror campaign, known as a “troll storm,” was launched by 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 article that urged “Let’s Hit Em Up[.] Are y’all ready for an old fashioned Troll Storm? Because AYO [hey you] – it’s that time, fam [family].”

6. To assist his white nationalist “fam,” Mr. Anglin provided phone numbers, email addresses, and links to social media profiles for Ms. Gersh, her immediate family members (including her twelve-year-old son), her friends, and her colleagues. Mr. Anglin also provided his followers with online discussion

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

7. “Just make your opinions known. Tell them you are sickened by their Jew agenda . . .” Mr. Anglin urged in his December 16, 2016 article. “This is very 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 making us feel.”

8. Mr. Anglin even urged his followers to seek Ms. Gersh out in person: “And hey – if you’re in the area, maybe you should stop by and tell her in person what you think of her actions[.]”

9. Mr. Anglin also posted a Nazi-fied image of Ms. Gersh in the December 16, 2016 article that comes up as a top online search result for Ms. Gersh’s name: a snapshot of Ms. Gersh in front of a fireplace, recalling the crematoria of Nazi Germany, superimposed with a yellow Star of David bearing the label “Jude,” German for “Jew,” in reference to the stars Jews were required to wear by the Nazi regime before and during World War II.

10. Mr. Anglin’s white nationalist fanatics, operating at his urging and exhortation, answered his call and directed hundreds of anti-Semitic, hateful, harassing communications—including death threats—to Ms. Gersh, her family members, her friends, and her colleagues.

11. These communications contained countless slurs and threats designed to inflict maximum emotional damage on Ms. Gersh. “[O]ven-dodging Christ killer,” “Worthless fuckin kike,” and “slimy jewess,” appeared among scores of other repugnant epithets.

12. This tsunami of threats arrived by email, social media, and voicemail: “We are going to ruin you, you Kike PoS [piece of shit] . . . You will be driven to the brink of suicide. & We will be there to take pleasure in your pain & eventual end.” Unidentified individuals threatened, “This is the goylash. You remember the last goylash, don’t you Tanya?” and, “Ratfaced criminals who play with fire tend to get thrown in the oven.”

13. To maximize the troll storm’s terrorizing effect on Ms. Gersh, Mr. Anglin and his followers even targeted her twelve-year-old son. Mr. Anglin called him a “scamming little kike” and a “creepy little faggot” in his December 16, 2016 article. Then Mr. Anglin’s followers, acting at his urging, harassed Ms. Gersh’s son with comments on his Twitter feed: “ask your mommy why she hates white people so much and runs an extortion racket.” A Twitter user with the handle “Kaiser Wilhelm II,” the name of an anti-Semitic German emperor, tagged Ms. Gersh’s son in a tweet that read, “psst kid, theres a free Xbox One inside this oven[.]” The tweet included a photograph of an oven.

14. Mr. Anglin and his followers targeted Ms. Gersh's husband, as well. Mr. Gersh received many threatening, hateful, and harassing phone calls, voicemails, false online reviews of his law firm and emails including this one: "Put your uppity slut wife Tanya back in her cage, you rat-faced kike. Tell your scamming son [name omitted] to kill himself, too. Day of the rope soon for your entire family."

15. Mr. Anglin justified his call to arms as retribution against Ms. Gersh, whom he accused of "extorting" a part-time Whitefish resident named Sherry Spencer. Ms. Spencer is the mother of Richard Spencer, an infamous white nationalist who gained notoriety when a video emerged of him spouting racist rhetoric and declaring, "Hail Trump! Hail our people! Hail victory!" at a gathering of white nationalists giving Nazi salutes in Washington D.C. soon after the November 2016 presidential election of President Donald Trump.

16. By way of background, Whitefish residents' discontent with the Spencer family had been simmering for years and reached a fever pitch when the "Hail Trump" video of Richard Spencer went viral.

17. The video's viral release prompted discussion among Whitefish residents, the vast majority of whom flatly reject Richard Spencer's hateful ideology. Some members of the community, believing that Ms. Spencer had not disavowed her son's racist views and was continuing to provide financial support

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 building's 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. Spencer, thinking it unlikely that Ms. Spencer would actually call.

20. But Ms. Spencer did in fact place a call to Ms. Gersh. Ms. Spencer asked, "What should I do? What would you do?" and expressed concern over the turmoil her building had caused in the community.

21. When Ms. Spencer lamented the trouble her building was causing, Ms. Gersh wondered aloud why Ms. Spencer was keeping it and said that if she were in Ms. Spencer's situation, she would sell the building, make a donation, and issue a statement disavowing her son's views.

22. Ms. Spencer took these ideas and ran with them, imploring Ms. Gersh to serve as her real estate agent for the sale. Ms. Gersh agreed.

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 building, making a donation, and denouncing her son's views.

26. The day after Ms. Spencer's *Medium* post, Mr. Anglin began posting articles on the *Daily Stormer* parroting Ms. Spencer's allegations against Ms. 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

easily, feels anxiety and discomfort in crowded places, has had trouble leaving her home, and fears answering her phone.

30. Ms. Gersh's physical symptoms include weight gain, joint pain, and hair loss. Overall, she feels like an entirely different person than she did before the troll storm, as though she has been permanently altered.

II. Jurisdiction and Venue

31. This action arises under Montana state law.

32. This Court has jurisdiction pursuant to Article III of the United States Constitution and 28 U.S.C. § 1332. The amount in controversy exceeds \$75,000, exclusive of interests and costs, and there is diversity of citizenship.

33. This Court has personal jurisdiction over Mr. Anglin because he purposefully directed conduct that resulted in the accrual of a tort action at residents of Montana, thereby injecting himself into the state's affairs.

34. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claim occurred in Whitefish, Montana.

35. Intra-district assignment to the Missoula Division is appropriate because a substantial part of the events or omissions which give rise to the claim occurred in Whitefish, Montana.

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 of Richard Spencer, a well-known anti-Semite, racist, xenophobe, and white nationalist who has been labeled the leader of the “Alt-Right,” short for Alternative Right.

42. Ms. Spencer has maintained a personal vacation home in Whitefish, Montana since 2006 but resides in Dallas, Texas.

B. Richard Spencer

43. Richard Spencer is president of the National Policy Institute (“NPI”), a racist, white nationalist think tank associated with the alt-right.

44. NPI aims “to elevate the consciousness of whites, ensure our biological and cultural continuity, and protect our civil rights. . . . [NPI] will study the consequences of the ongoing influx that non-Western populations pose to our national identity,” according to its mission statement.

45. Richard Spencer and NPI rose to national prominence when a video of Mr. Spencer speaking at a November 19, 2016 white nationalist convening in Washington, D.C. went viral. In the video, Richard Spencer declares, “Hail Trump! Hail our people! Hail victory!” as attendees raised their hands in Nazi salutes.

C. The Spencers’ Downtown Whitefish Property

46. A mixed-use property known as 22 Lupfer stands in downtown Whitefish.

47. The Spencers purchased the property on May 1, 2013, under the name of Roediger Property, Inc., of which Richard Spencer was an owner.

48. Ms. Spencer claims to have taken Richard Spencer out of the business entity that held title to the property but has not explained why he was on the title to the property in the first place or whether he receives income from the rents.

49. Richard Spencer applied for a building permit for the lot on September 18, 2014.

50. Some residents protested in front of 22 Lupfer around the time of the building permit application, as the application and Richard Spencer's racist views were common knowledge in Whitefish.

D. The Spencers' Relationship with Whitefish

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 residents with dignity and respect.

53. The Whitefish City Council, for example, approved an anti-hate resolution in December 2014, declaring "its support of Whitefish community values that recognize and celebrate the dignity, diversity, and inclusion of all of its inhabitants and visitors, and protect and safeguard the right and opportunity of all persons to exercise their civil rights, including the rights of free speech, freedom of assembly, and freedom from discrimination."

54. As the city government was standing up for values of inclusion and diversity, community organizations began to distance themselves from the

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 grew as Richard Spencer's profile expanded to a national stage.

56. About seventy residents of Whitefish gathered for a meeting during or around the week of November 13, 2016. Someone in the meeting proposed boycotting the businesses of Ms. Spencer's tenants. Although the idea was swiftly rejected, talk of a boycott or protest nonetheless persisted in the Whitefish community.

57. Ms. Gersh heard the rumors of a possible boycott or protest and began to notice people driving past Ms. Spencer's building. She even saw three or four people park, get out of their cars, and photograph the building.

58. Ms. Gersh grew concerned that a protest would actually take place, and she tried to warn several of her friends who rented space as commercial tenants in Ms. Spencer's building.

59. At least one tenant had received warnings from a number of individuals in addition to Ms. Gersh. That tenant called Ms. Gersh asking for

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. Ms. Spencer's Call

61. A few minutes later, Ms. Spencer did call Ms. Gersh, essentially asking, "What do I do?" and, "How should I handle this?"

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 in Ms. Spencer's situation, she might sell her building, donate the profits, and make a public statement.

63. Ms. Spencer apparently liked these ideas and implored Ms. Gersh to be the realtor. "Is that something you would help me do?" she asked.

64. Ms. Spencer gave Ms. Gersh an access code to the building and asked her to go down to the building in person since Ms. Spencer was still in Texas, so that Ms. Gersh could look around, decide how to market it, and determine a proposed list price.

65. Ms. Spencer also asked Ms. Gersh for assistance drafting a press release about the sale and about her rejection of her son's racist ideology.

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 personally notified some of Ms. Spencer's tenants about the potential resolution. Ms. Gersh also shared this information through Facebook hoping to quell discussions of boycotts or protests.

G. Ms. Spencer's Change of Heart

69. Thanksgiving was a couple days later, and Ms. Spencer spent the holiday in Dallas, Texas, where she lives and has family.

70. On December 1, 2016, Ms. Spencer emailed Ms. Gersh, expressing anguish about the decision to sell the building as well as her relationship with her son: "Richard's actions and statements are not only upsetting to the public at large, but privately have been a source of anguish within our family for several years."

71. Ms. Spencer expressed interest in proceeding independently, without Ms. Gersh serving as the real estate agent.

72. Ms. Gersh responded later the same day, “Thanks for the honest and admirable email. I agree not having me list the building is the right decision. The more I had been thinking about it, the more I had been feeling it wouldn’t be right given the delicate situation. It was why I invited you to lunch. I had the desire, mother to mother, to meet in person and offer support in any way I could. I admire you for the statement you are making. I want you to know how sorry I am for having to be the one to break the situation to you. I hope you understand that I was only trying to save you and your tenants from a public protest and humiliation, in which I was not even involved in. I am grateful it ended peacefully before it began. Your actions will have more of a positive impact on this community than you can ever imagine.”

73. Ms. Gersh included contact information for another realtor with a potential buyer. Ms. Gersh again forwarded contact information for a realtor with another potential buyer the next day. This was the last communication between Ms. Gersh and Ms. Spencer.

H. Ms. Spencer's Accusations

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 Lupfer Avenue property.

75. On information and belief, the blog post was ghostwritten by Ms. Spencer's son, Richard Spencer.

76. Ms. Spencer claimed in the post that she "had no intention of selling . . . until [she] started receiving terrible threats in the last couple of weeks."

77. Falsely attributing the "threats" to Ms. Gersh, Ms. Spencer began to spin a twisted tale of the events that took place, writing that Ms. Gersh "relayed to me that if I did not sell my building, 200 protesters and national media would show up outside—which would drive down the property value—until I complied. [Ms. Gersh's] other conditions included that I make a public denunciation of my son in a statement written by the Montana Human Rights Network and that I make a donation to this organization from the sale of the property."

78. Although Ms. Spencer had implored Ms. Gersh to act as her realtor, even offering her the access code to the building, Ms. Spencer now falsely accused Ms. Gersh of "shamelessly suggest[ing] that she act as my realtor!"

79. Ms. Spencer falsely accused Ms. Gersh of seeking "financial benefit from threats of protests and reputation damage."

I. Mr. Anglin's Involvement

80. Mr. Anglin posted the first in a series of thirty articles related to Ms. Gersh on his website, the *Daily Stormer*, titled, "Jews Targeting Richard Spencer's Mother for Harassment and Extortion – TAKE ACTION!" on December 16, 2016—the day after Ms. Spencer's *Medium* post.

81. The article published contact information for Ms. Gersh and members of her family and exhorted readers to contact and visit them to "[t]ell them you are sickened by their Jew agenda"

82. Mr. Anglin attacked Ms. Gersh, accusing her of engaging in "clear and obvious extortion. They are saying 'give us money, or we are going to continue this campaign of terror against you and your family.'"

83. Mr. Anglin also accused Ms. Gersh of "trying to silence Richard Spencer by harassing his mother."

84. Mr. Anglin encouraged readers to call Ms. Gersh "and tell her what you think. And hey – if you're in the area, maybe you should stop by and tell her in person what you think of her actions[.]"

85. Mr. Anglin published Ms. Gersh's cell phone number and the address for the office of Ms. Gersh's husband.

86. Mr. Anglin encouraged readers to "leave a review of her business on Google, and perhaps note that it is [a] front for an extortion racket."

87. Mr. Anglin included an image of Ms. Gersh in front of a fireplace superimposed with a yellow Star of David bearing the label “Jude,” German for “Jew,” with a note that she “posts slut pics on the internet.” Ms. Gersh was particularly disturbed by this picture because it seemed to have been carefully selected for its imagery—a Jew next to a blazing fire, reminiscent of Holocaust atrocities.

88. Mr. Anglin also published the Twitter handle of Ms. Gersh’s twelve-year-old son and encouraged readers to take to Twitter and “tell them what you think of his whore mother’s vicious attack on the community of Whitefish.” Mr. Anglin called Ms. Gersh’s son a “creepy little faggot” and a “scamming little kike.” Mr. Anglin further accused Ms. Gersh’s son of “pushing advertising scams” on his Twitter followers.

89. Mr. Anglin also published Mr. Gersh’s work phone number and work email, and included a link for readers to submit a Google review of Mr. Gersh’s law firm. Mr. Anglin further encouraged readers to “give him a call or stop by his office and let him know what you think of his wife’s behavior, advise him to get a leash on that hoe.”

90. The December 16, 2016 article written by Anglin also included three photos of the Gersh family: one of Ms. Gersh, one of Ms. Gersh’s twelve-year-old son, and one of the whole Gersh family.

91. Mr. Anglin told readers, “Let’s Hit Em Up[.] Are y’all ready for an old fashioned Troll Storm? Because AYO – it’s that time, fam.” Mr. Anglin told readers, “[M]ake your opinions known. Tell them you are sickened by their Jew agenda to attack and harm the mother of someone whom they disagree with.” Mr. Anglin also wrote, “This is very 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 making us feel.” The headline of his article includes the phrase: “TAKE ACTION!”

92. Mr. Anglin also attacked local rabbis, as well as local business owners. He also spewed his hatred toward Jews generally in his December 16, 2016 article, calling them a “vicious, evil race of hate-filled psychopaths.” Mr. Anglin wrote, “All of these Jew organizations engage in this transparent extortion racket with impunity.”

J. Opened Floodgates

93. As soon as Mr. Anglin’s December 16, 2016 article went live, Ms. Gersh and her family began to receive hundreds of threatening communications, including phone calls, voicemails, text messages, emails, letters, social media comments, and malicious Christmas cards. At last count, Ms. Gersh had received more than 700 instances of harassment against her family as a result of Mr. Anglin’s troll storm.

Harassment Ms. Gersh Received – Emails

94. Ms. Gersh received emails through her personal email account including the following messages, among others:

- a) “Ratfaced criminals who play with fire tend to get thrown in the oven.”
- b) “Merry Christmas, you Christ-killer”
- c) “Worthless fuckin kike. Eat a dick.”
- d) “You’re going to jail for extortion you hateful bitch”
- e) “It’s time for you to take a one way ticket to tel aviv”
- f) “This is the goylash. You remember the last goylash, don’t you Tanya? Merry Christmas, you Christ killing Jew.”
- g) “We are going to ruin you, you Kike PoS. The same way you do anyone else. You mother-fuckers are going taste your own medicine, as we harass you & yours in your public & professional lives. You will loose money. You will be driven to the brink of suicide. & We will be there to take pleasure in your pain & eventual end. You have hated us for so long, now you shall feel the sharp prongs of hatred from us. I look forward to seeing how the glove feels on the other hand... ??”

- h) “You and your sayanim really fkd up this time....We are going to 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 suicide..Again...lol”
- i) “please go fucks niggas and leave white people alone; we don’t need you, we don’t want you. nothing you do is good You don’t get no juice unless you squeeze Lemon Obrien, the Third.”
- j) “You are a disgusting, vile Jew. You filthy & depraved Jews never learn; it is your peoples’ behavior responsible for our 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-Jewish attitudes, deal with it! You reap what you sow, and we don’t give a fuck about your feelings. This is OUR country: you’re merely living here (for now).”

reachable by email to “Satan@666death.com” and phone to “666-666-6666.”

- b) “You have no idea what you are doing, six million are only the beginning” This message came from a user with the name “Fuck You Kike” and the email address “youfuckingkike@hotmail.com.”
- c) “We see that nest of dirty kikes over at purewest and Christie’s...We know your a bunch of sayanim freaks... Make Aliyah you fkn Bolshevik pcs of shit.. We’re coming!”
- d) “FUCK YOU”
- e) “Do you think Tanya Gersh 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 "PureWest" Real Estate in the coming years.”
- f) “Tanya Gersh is an extortionist that should have her real estate license stripped from her. Disgusting anti american thug. Extorting property and money from Sherry Spencer. Disgusting”
- g) “Tanya Gersh is a disgusting thug that extorts money from people because of their politcal beliefs. What an un american whore.”

96. Some messages that Ms. Gersh received through her work email account as a result of Mr. Anglin's troll storm were copied to her colleagues and were calculated to cause her to be fired:

- a) "I'm very concerned that your company is employing Tanya Gersh who has launched an illegal, bullying, economic and business attack against Sherry Spencer in Whitefish, MT. I hope your company will let Mrs. Gersh go so that she cannot use your business to further harass innocent people."
- b) "You should fire and disavow Tanya Gersh for her unprofessional, illegal, and anti-white conduct. Do the rest of your agents engage in extortion and intimidation as well?"
- c) "I'm just writing to let you know I will never do business with your company and I will also tell everyone I know not to do business with you until such time as you fire your employee, Tanya Girsh a vile woman who has taken part in an extortion and harassment campaign against a resident of Whitefish. Get rid of her or get boycotted."
- d) "Tanya Gersh is extorting a local resident, you are employing someone engaging in extortion and harassment, is this really the kind of image you want to portray to the world? Better get rid of her before this becomes national news and you are implicated."

e) “I notice you are using a realtor who is 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 cooperation.” This message was sent by someone claiming to be Richard Spencer.

Harassment Ms. Gersh Received – Phone Calls

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

98. One caller said, “You should have died in the Holocaust with the rest of your people.”

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

Harassment Ms. Gersh Received – Voicemails

100. Voicemails that Ms. Gersh received included the following statements:

- a) “You filthy piece of trash. You are threatening an old lady. You worthless piece of shit. I hope you die, you worthless cunt. You stupid ugly bitch.”
- b) “Fuck off Jew.”
- c) “Fuck you, you stupid Jew.”
- d) “Give me a fucking [unintelligible] ho. You keep talking all that shit. You think I’m gonna hang up now? You got my dick hard bitch. [unintelligible] what the fuck you want to do with this shit? Give me your fucking address. [unintelligible] leave me [unintelligible] right now. I got your fucking name ho. [unintelligible]”
- e) “Oh sorry, I think I have the wrong number, I was looking for the crematorium.”
- f) “You are surprisingly easy to find on the internet. And in real life.”
- g) “Why don’t you filthy fucking kikes leave Richard Spencer’s mother alone. FUCKING KIKES!”
- h) “Really disgusted with your pro-Jewish sentiment. Oh my god, how could you fucking out of the case for your own race, you disgusting

fucking piece of shit. Oh wait it's ok when you advocate for Jewish interests right? Isn't that the right one? [unintelligible] Fuck off."

- i) "Hello this is Chris. Um I wanted to talk to you about a medium sized resort town. It's in Montana. Go kill yourself you fucking Jewish kike. Alright. Thank you."
- j) "When are you going to move your kike ass to Tel Aviv and start managing brothels there?"
- k) "You fucking filthy kike whore. Don't you for a second...this is Trump's America now."
- l) "Oh hi there Tanya. I wanted to let you 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 vile cunt, so burn in hell Sherry. Or Tanya. Tanya Gersh. Yeah. You are a disgusting vile human being. Let that be known. Thank you."
- m) "You are a horrible nasty human being. I don't know how you sleep at night. I hope you get call after call after call that tells you how terrible of a person you are."

- n) “Listen here you fucking Jew. You had better back off and leave Richard Spencer’s mom alone you dirty scumbag. You fucking Jew. You had better back off of Richard Spencer’s mom. Everybody is watching you.”
- o) “You are a slimy extortionist. Give up what you’re doing. It’s wrong.”
- p) “You’re a disgusting person. And you’ll burn in hell after you die. And you’ll die alone. Fuck you.”

Harassment Ms. Gersh Received – Text Messages

101. Ms. Gersh received text messages that included the following statements:

- a) “What a horrible person you are. A money-grubbing kike whore extortionist”
- b) “Hi Tanya, hundreds of people are reporting you to the Board of Realtors and other legal agencies due to your illegal extortion activities. Good luck!”

Harassment Ms. Gersh Received – Letters and Postcards

102. Ms. Gersh also received several harassing letters and postcards.

103. One letter, postmarked December 24, 2016, contained the following message: “Ms. Gersh: STOP BEING AN ANTI-FREE SPEECH, ANTI-AMERICAN (rather, UN-American!) Bolshevik Jew(!) and please APOLOGIZE

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

104. Another postcard included, “[T]he Jewish Left can burn in hell (that includes you, lady).”

105. Ms. Gersh also received packets of tourist information for different states (Kansas, Arkansas, and Nebraska), all addressed to “Tanya Shalom Gershberg” at Ms. Gersh’s home address, presumably as a result of Mr. Anglin’s troll storm.

Harassment Ms. Gersh Received – Christmas Cards

106. Ms. Gersh received several malicious Christmas cards.

107. One card, postmarked December 24, 2016, bore the message, “A happy Christmas to you and to those you love.” The word Christmas was underlined twice in red ink and accompanied by an explanatory note with more underlining: “because America is a Christian nation! SORRY! YOU HAVE ISRAEL.” The sender also hand-wrote, “Dear Tanya, I realize that as a Jew your ancestors have zero traditions of free speech beyond the shtetl, but Americans (whose great-great-grandparents weren’t Bolshevik Communists) would greatly appreciate if you STOPPED persecuting freedom-loving, Christian Americans, STOP BEING A JEWISH BOLSHEVIK. We know what you’re doing.”

Harassment Ms. Gersh Received – Social Media Comments

108. Ms. Gersh's personal Twitter account was tagged in tweets:

- a) "do you truly think we'll forget about this? That you'll get away with it? We have a good memory for these things"
- b) "Hope everybody sends Tanya a nice Christmas Card telling her where she can take her business...."
- c) "You're un-American, leave."
- d) "I'm super pissed about this. Going after a mans mother is disgusting, it's like going after the children."
- e) "not so nice when it's you being harassed, is it ;)"
- f) "why waste time in a court room? There are other ways," a user named BaconBooks&Bullets threatened. Perhaps fearing he'd crossed a line, he later wrote, "I am [not] advocating violence in any way. I advocate peace. But I am fairly certain she will disappear soon."
- g) "oooooosh looka dat schnozz!!" one user posted, followed by another tweet: "beady lil eyes too!"
- h) "Remember, creature, that you started this. When we come for you, remember that it is your fault."
- i) "Hickory dickory dock, the kike ran up the clock. The clock struck three and Internet Nazis trolls gassed the rest of them." This user

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

j) “Thanks for demonstrating why your race needs to be collectively ovened.”

k) “Are you going to take yourself out of the equation, @GershTanya? #JustDoIt!” This user included memes about suicide.

109. Richard Spencer himself tweeted, “Nasty Tanya never lets ethics or common decency get in the way of a good deal,” and linked to the emails his mother published on *Medium*.

110. As a result of Mr. Anglin’s troll storm, Ms. Gersh received harassing comments on her YouTube page before she deactivated her account, including, “Tanya Gersh is a filthy jew[.]”

111. As a result of Mr. Anglin’s troll storm, Ms. Gersh received several hateful messages on Facebook before she deactivated her account.

Harassment Ms. Gersh Received – Other

112. Ms. Gersh also received hateful and harassing comments on her personal website, tanyagersh.com.

113. Ms. Gersh took down her website and did not save the content in her distressed state as a result of Mr. Anglin’s troll storm.

114. Ms. Gersh removed her wedding planner profiles from popular wedding websites, including theknot.com, as a result of Mr. Anglin's troll storm.

115. As a result of Mr. Anglin's troll storm, someone published a fabrication about Ms. Gersh on a website called shesahomewrecker.com suggesting that Ms. Gersh lured another woman's husband to bed.

116. Ms. Gersh also received subscription notices for far-right news media that individuals had maliciously signed up for using her email address as a result of Mr. Anglin's troll storm, 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 profiles on the websites realtor.com and zillow.com as a result of Mr. Anglin's troll storm.

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) "Put your uppity slut wife Tanya back in her cage, you rat-faced kike. Tell your scamming son [name omitted] to kill himself, too. Day of the rope soon for your entire family."

- b) “Kindly sell your practice and give all money to NPI. Then apologize to White people for Communism, Trotsky, the Holodomor, the word 'racism,' decades of anti-White propaganda, etc.”
- c) “Dont harass Richard Spencers Mother...fucking JEWS!”
- d) “JUDAH- SO YOUR WIFE HAS A PROBLEM WITH WHAT RICHARD SPENCER HAS SAID AND GOES AFTER HIS MOM. WHAT THE FUCK. WHY DIDN'T YOUR WORTHLESS PIECE OF SHIT WIFE GO AFTER RICHARD SPENCER, THE PERSON, INSTEAD? FROM WHAT I'VE SEEN WITH ZIONIST JEWS, THEY DO NOT LIKE FREE SPEECH. IF A WHITE PERSON DID WHAT YOUR WIFE DID TO A JEW, THEY WOULD BE FIRED ON THE SPOT AND A BIG ROUND OF APOLOGIES WOULD ENSUE. BUT WHEN A JEW PICKS ON AN OLD WHITE WOMAN, THE JEWISH PRESS RALLYS AROUND THE JEW INSTEAD OF THE WHITE WOMAN. YOUR WIFE IS PROVING HITLER WAS RIGHT ABOUT THE JEWS.”
- e) In an email with the subject “the holocaust is coming” the sender wrote “go the fuck back to hell where you came from. filthy hook-nosed satanists.”
- f) “Gersh, your wife’s vaginal discharge reeks. She’s filthy.”

- g) “Your jewish supremacy has no more business in a Christian society. We are awake -and on to your subversive and tribal nationalism. Millions have been affected by your sick supremacist race -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’ll soon find no one willing to stop what your bringing on to yourselves. Christians had enough jewish hate, its time for you to leave.....”
- h) “Your treatment of Richard Spencer’s mother is absolutely disgusting. It just shows you that Jews are sociopaths, trying to ruin someone financially because they disagree with her sons political views.”
- i) “When will your firm be dismissing Judah Gersh for his family’s 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 you touch...If you’re smart...Ditch Gersh!”

Harassment Husband of Ms. Gersh Received – Voicemails

119. Voicemails that Mr. Gersh received included the following statements:

- a) “You know, it really irks my feces that shylocks like you think you can josh our people and, you know, do the damage you’re doing. I

don't appreciate it. I'm sure no one else appreciates it. I mean Jesus Christ you guys live in Montana. You're kind of a super minority there. At least do your best to fit in. It's not cool. Leave Richard Spencer's mama alone. Thank you and have a nice day. And happy Rosh Hashanah or whatever the fuck you celebrate for your volcano demon god."

- b) "Judah, yeah, this is a fellow Montanan here. We're not far away from you. And I would suggest that you actually hold out the reins on your wife, Tanya. You and your kike fucking mentality. Seriously bro, like pull back. You know, go back to Philadelphia. Or better yet, go back to Israel. You're gonna go back, bro, go back."
- c) "Hey you ugly fucking kike. We know what you want to do. You want to kill all the white people. [Unintelligible] fuck him. Kike rat. I know what your [unintelligible] said you piece of shit. I know you see us as worthless animal goyim. We want you and your fucking Jew lies [possibly, lives], you fucking Jew rat. We know all your crimes, all your crimes. May Hitler guide us."
- d) "Is your wife still persecuting Sherry Spencer? Cuz if it is, well, I'm fucking...rein that bitch in. Because you're at...Your fucking

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

- e) “Hi Tanya. If you are messing with Richard Spencer’s mom, you should really stop. Because if you own a business, you don’t want to start this war with the internet. The internet will win. The internet stands behind Richard Spencer. So I’m just warning you that nothing...we’re really gonna like troll your Facebook, your business and everything. It will be worse than Pizza Comet. So just letting you know. That whole thing going on with Pizza Comet will go on with you.” (“Pizza Comet” is a reference to an incident in November 2016 in which a gunman fired shots in a pizza restaurant as a result of his believing an Internet hoax that had been hyped on various websites, including Mr. Anglin’s website.)

Harassment Husband of Mr. Gersh Received – Letters

120. Mr. Gersh received numerous letters at his law office as a result of Mr. Anglin’s troll storm.

121. One of the letters contained just one phrase, written in blue pencil, “Juden Raus,” meaning, “Jews out.” The phrase was used by Nazis and is the name of a Nazi board game akin to Monopoly, the object of which was to collect as many Jews as possible as the player made his way around the board.

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 Ms. Gersh's twelve-year-old child and encouraged his followers to do so as well, resulting in numerous harassing tweets, including the following:

- a) “[A]sk your mommy why she hates white people so much and runs an extortion racket.”
- b) “[Name omitted], I saw ur mom kissing some guy who wasn't ur dad inside Casey's the other day! Ask ur mom about it?”
- c) “[Name omitted], your mother is going to get sued and lose everything. Please put her back in the kitchen where she belongs.”
- d) “did your rabbi do this to you?” (The user posted an image of a news article with the headline “Not Sucking Baby's Penis After Removing Foreskin Is Heresy, Haredi Rabbi Says.”)
- e) “Keep a leash on yo mama”
- f) “psst kid, there's a free Xbox One inside this oven” The user included an image of an oven.
- g) “Tell your mom to stop with her vicious attacks on Richard Spencer! WTF is wrong with you freaks?!”

123. Ms. Gersh's son received harassing comments on a YouTube video that he posted as well: "what do you think of your mom harassing Richard Spencer's elderly mother and forcing her to sell her business? What does Judah say, being a lawyer?"

124. The Gershes quickly decided to deactivate their son's YouTube and Twitter accounts after realizing he was being targeted as well.

K. Mr. Anglin's Second Article

125. Mr. Anglin posted another article on December 17, 2016, repeating the extortion tale about Ms. Gersh and making several demands: "On behalf of global Nazism, I am hereby demanding that the Jew Tanya Gersh sell her property in Whitefish and donate the money to [the National Policy Institute, the white nationalist organization of which Richard Spencer is president], issue an apology to the community, the white race and goyim everywhere, and immediately move to Israel."

126. Mr. Anglin threatened, "So you have to go back, Tanya. You simply are not welcome in this country. We've had enough, Tanya. This is the goylash. You remember the last goylash, don't you Tanya?"

127. Mr. Anglin goes on: "Yeah. You're gonna wanna dip out before this thing really gets started. Because I'll tell you want [sic], Tanya. This fire is already rising."

128. Mr. Anglin continues: “There’s only one place this road ends. Keep Up the Pressure. Keep calling these people. Keep emailing them. Make it known to them that the jig is officially up. We aren’t playing this game anymore. The entire list of contact information is in my last post. Go do it.” Mr. Anglin posted a link to the first article he published about Ms. Gersh on December 16, 2016.

L. Mr. Anglin’s Continued Posts

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 in a December 19, 2016 article titled, “Lying Jew Media Says Daily Stormer ‘Threatened’ Jewish Racketeers Extorting the Spencer Family,” writing, “We will keep putting pressure on these Jews, Tanya Gersh in particular, until they stop harassing the Spencers and issue an apology for this brutal Jewish racketeering. . . . So please, if you haven’t contacted these people to let them know what you think of their deranged actions, do so. The contacts are all in this article.” Mr. Anglin provided a link to his December 16, 2016 article.

131. Mr. Anglin also promised to provide an “extended contacts list, where you will be able to tell the business associates of these people what you think of

their actions, and ask that they cut their business ties with the Jews engaged in this campaign of harassment and extortion against the Spencers.”

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 in this article, writing, “As 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 law) confrontation.”

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, “I can also photoshop pictures of your face and that of your scamming spammer rat son onto Nazi propaganda posters from the 1930s! No one can stop me from doing this, Tanya! It’s in the Constitution!” and included the following image of Ms. Gersh and her son superimposed onto a Nazi propaganda poster:



136. Mr. Anglin promised to continue attacking Ms. Gersh: “Well, tomorrow we’re kicking it up a notch – so get ready. I am going to post an entire list of business . . . ties with these individuals due to their unethical practices of threats, harassment and extortion of family members of people they disagree with.”

137. Mr. Anglin concluded this second article with “Hail Victory.”

December 22, 2016 Articles

138. Mr. Anglin exhorted readers to “catchup quickly and join this MEGA TROLLSTORM” in a December 22, 2016 article.” He then published the contact information for Ms. Gersh’s employer and others with whom she is associated.

139. Mr. Anglin commanded, “GET TO IT! If you are a true warrior for the cause, you will make time to contact all of these people. I’m serious. We are all busy. Trust me, I know about busy. But this is so, so important. We have to stand up to these people, and we have to force an apology from Tanya Gersh . . . So, if you don’t have time: make time. Call and email all of these people. Do it right now.”

140. Apparently believing that a disclaimer would exculpate him, Mr. Anglin wrote, “AND AS ALWAYS: ABSOLUTELY NO THREATS OF VIOLENCE, SUGGESTIONS OF VIOLENCE OR ACTS OF VIOLENCE. DON’T DO IT. IT 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 STUPID. KEEP EVERYTHING ON THE LEVEL.”

141. The next sentence in the article belies his claim: “For the next phase 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: “Leave Whitefish, leave Montana. Change your name, change your occupation. Don’t let me see your face or we both will suffer as a result. You – immediately, me when they get me. LEAVE.” This email was signed “AA,” the initials Mr. Anglin used to sign an editor’s note in a February 3, 2017 *Daily Stormer* article.

143. After discussing logistics of the armed protest, Mr. Anglin posted an image of Ms. Gersh, her son, and two other Jewish residents of 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 Whitefish, was “throwing Tanya Gersh under the bus,” in his December 23, 2016 article, “WHITEFISH GAME CHANGER: Love Lives Here Throws Tanya Gersh Under the Bus!” even though Love Lives Here continuously supported the Gershes and other victims of Mr. Anglin’s troll storm.

145. Mr. Anglin then encouraged his readers to contact businesses and organizations associated with Ms. Gersh, writing “Earlier today, I made a huge post with contact information for business contacts of the racketeers and their supporters. GO CONTACT THESE PEOPLE NOW! If they don’t answer the 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 at 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 “Kek,” an alt-right meme.

149. In the second, the article published by Mr. Anglin claimed that “Jews in Montana, Whitefish [sic] are . . . persecuting anyone who dares to speak out,” and linked to the December 21, 2016 article featuring an image of Ms. Gersh and her son 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 a December 26, 2016 article published by Mr. Anglin in the *Daily Stormer*.

151. Richard Spencer said in the interview, “I know bad things about Tanya Gersh,” and accused her of extorting his mother.

152. Richard Spencer repeated lines from the *Medium* article almost verbatim.

153. The *Medium* article contains the text, “In other words, I poured my heart and soul into this project,” and Richard Spencer said, “She poured her heart and soul into it, as she wrote in a letter that you can read online.”

154. The *Medium* article also contains the text, “Whatever you think about my son’s ideas—they are, after all, ideas—in what moral universe is it right for the ‘sins’ of the son to be visited upon the mother?” Mr. Spencer said, “And, effectually, the—the sins of the son are being visited upon the mother.”

December 27, 2016 Article

155. Mr. Anglin encouraged readers to listen to a radio interview of himself on the David Duke Show in a December 27, 2016 article.

156. In the interview, Mr. Anglin recounts the false story about Ms. Gersh extorting Ms. Spencer for the fifth time.

December 28, 2016 Article

157. Mr. Anglin recounted the false story of Ms. Gersh extorting Ms. Spencer for a sixth time in a December 28, 2016 article, this time in the context of deriding elected Montana officials for releasing a statement disavowing anti-Semitism.

158. Mr. Anglin likened Ms. Gersh to ISIS and Ms. Spencer to a public execution victim, writing, “Gersh had provided Spencer with a pre-written apology/confession, which they asked her to read to the community. This practice

is also popular among ISIS, which usually requires public execution victims to read aloud a scripted apology/confession before death.”

January 5, 2017 Article

159. Mr. Anglin updated his followers on his plans for an armed protest in a January 5, 2017 article.

160. Mr. Anglin published a copy of his permit application for an armed protest and announced the official title of the event as the “James Earl Ray Day Extravaganza” in honor of the man convicted of murdering civil rights icon Martin Luther King, Jr.

161. Mr. Anglin claimed that the march was supposed to end at Ms. Gersh’s home, “but we decided it would be too cold. We will instead simply march through the center of town, ending at a Memorial Park where several speakers will speak.”

162. Mr. Anglin announced that marchers would include white nationalists from the U.K., Sweden, France, and Greece.

163. Mr. Anglin confirmed that a representative of Hamas would attend and “give a speech about the international threat of the Jews,” posting a photograph of heavily armed men in masks:



164. Mr. Anglin posted a clip of the song “Be Prepared” from the Disney film *The Lion King*, and wrote, “And they will rue the day, as they see two hundred skinhead Alt-Right Nazis marching with a guy from Hamas carrying machine guns through the center of their town!”

165. Mr. Anglin concluded his article with a photograph of armed Nazis marching:



January 6, 2017 Article

166. The story about Ms. Gersh harassing Ms. Spencer was posted on Anglin's *Daily Stormer* for the seventh time in a January 6, 2017 article summarizing the Alt-Right's 2016 activity: "Dec16 – Harassment and extortion of Richard Spencer's mother by Jewish activists. Proving that there is always a profit to be made, Montana realtor (((Tanya Gersh))) had the gall to suggest Richard's mother do the following: 1. Denounce her son (as opposed to just disavowing his beliefs, which she did) 2. Sell the building and make 'a donation to human rights efforts' (after threatening to organize protests outside the property, which would lower its value)."

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 alt-right meme:



January 8, 2017 Articles

169. The story about Ms. Gersh was repeated on Anglin’s *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, were attributed to Mr. Anglin’s own “planned march in Whitefish, Montana to support Spencer after his mother was illegally harassed by Jewish racketeers.”

170. The article expressed Mr. Anglin’s typical anti-Semitism: “These Jews can’t even admit that what their people did to Spencer’s mother was wrong. 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 Jew that much more.”

171. Mr. Anglin posted a second article that day denigrating the World Jewish Congress President Ronald S. Lauder for demanding “that authorities in Montana immediately put a stop to an armed march being planned by neo-Nazis in the town of Whitefish on January 15.”

172. Mr. Anglin falsely claimed in this article that Ms. Gersh had “pending litigation against her for her racketeering activities.”

173. Mr. Anglin wrote that he was in communication “with our anti-Jew comrades in Hamas, as we prepare to join hands in Whitefish and march against the Jews, and you just can’t even believe what these poor bastards are dealing with over there.” Elaborating, Mr. Anglin wrote, “These Jews in Israel are just running around killing babies left and right! They took their land! Just went ahead and straight jacked it! Can you believe it??? No wonder they’re so angry!”

174. Mr. Anglin reiterated his interest in the armed protest, sharing a quote from the Whitefish police chief in a mainstream news article and writing, “Dial seems like a pretty cool guy, and I don’t think he’s going to block us from keeping our weapons LOADED.”

175. Mr. Anglin provided more details about his plans for an armed protest: “Currently, we have 178 skinheads being bussed in from the Bay Area on 6 large buses. Including international representatives, we will have a total of around 225 people marching through the city, though only about a third will be armed with machine guns. Others may carry baseball bats or swords, we haven’t decided yet.”

176. Mr. Anglin concluded the post with an image of Nazis marching:



January 10, 2017 Articles

177. Mr. Anglin’s followers were directed to listen to another episode of the David Duke Show featuring Richard Spencer in a January 10, 2017 article on the *Daily Stormer*.

178. The section of the interview about Ms. Gersh was highlighted for Mr. Anglin’s readers: “Richard Spencer also updated listeners on the efforts by Jewish

extremists to wreck and extort money from his mother's business in Whitefish, Montana as a means of silencing Richard's own voice."

179. Readers were encouraged to "share [the interview] widely."

180. In the interview, Richard Spencer repeated the accusations he made against Ms. Gersh in his December 26, 2016 interview with David Duke: "There 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 her broker. It was just a really terrible situation."

181. David Duke interjected, "Well she's totally consistent with the Talmud and the Halacha. That's for sure."

182. Richard Spencer said, "I'm afraid I agree with you."

183. David Duke recounted the extortion narrative Mr. Anglin continues to promote: "Your mother, who has no political association with you, of course, she doesn't agree necessarily – you have made a statement she doesn't agree with your politics, was targeted in an attempt to destroy her financially, destroy her business, and to basically, profit from it by a number of Jewish elements in Montana."

184. Richard Spencer responded, repeating the extortion narrative yet again, "I mean, Tanya Gersh, who was the person involved in the shakedown of my mother, she just expected her to sell her property, denounce me. I would leave town, and it would just be an easy victory. But the fact is, my mother fought back.

She wrote about what happened. She actually released the e-mails online. That was a huge thing.”

185. Mr. Anglin updated his followers on the armed protest in another article published January 10, 2017.

186. In this post, Mr. Anglin revealed that the city government of Whitefish denied his permit application for the armed protest: “The local government of Whitefish, Montana, where we have been planning to have an armed Neo-Nazi march against local Jewish terrorists, have attempted to cockblock us by denying our permit based on some alleged technicality.”

187. Mr. Anglin indicated that he would probably postpone the march and concluded this post with “Hail Victory.”

January 11, 2017 Article

188. Mr. Anglin confirmed that he would postpone the armed protest in a January 11, 2017 article, but promised more guns at the rescheduled event: “[W]e will need to postpone the planned march. We will of course be rescheduling . . . and the march will be bigger and have more guns and special guests than we originally planned.”

January 18, 2017 Article

189. Mr. Anglin repeated the extortion narrative about Ms. Gersh for the ninth time when he published a January 11, 2017 article on the *Daily Stormer*

reporting that a group of anti-fascist protesters in Whitefish “came out to defend real estate speculator (((Tanya Gersh))), who sought to use Richard Spencer’s status to mobilize Whitefish Jewry into intimidating his mother into selling her property to Gersh and leaving the town.”

190. The article contained a link to Mr. Anglin’s December 16, 2017 article containing Ms. Gersh’s contact information.

January 19, 2017 Articles

191. Mr. Anglin published an article titled “Whitefish: Christ-Killing Kikes Trying to Have Daily Stormer Classified as a Terrorist Group...!” on January 19, 2017.

192. Mr. Anglin began his article, “The nerve of these Jews. Shaking my damn head. It never ceases to amaze.”

193. Mr. Anglin repeated the extortion narrative about Ms. Gersh for the tenth time in his January 19, 2017 article, writing, “It was the Jew Tanya Gersh who threatened Richard Spencer’s mother. It was the Jewish community of Montana . . . which backed up Gersh in her campaign of extortion. We simply responded. And yet, somehow, we are the bad guys. And the Jews are the victims.”

194. Mr. Anglin characterized the Holocaust as a hoax and attempted to draw a connection to Whitefish: “This is just like another Holocaust, a hoax

created to defame good and well-meaning people who are trying to protect themselves and their kinfolk from the international Jewish terror network.”

195. Mr. Anglin denigrated all Jewish people: “The Jews are a vicious, 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 recorded history, has been a series of terrorist incidents.”

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



197. Mr. Anglin concluded this article with the statement, “Hitler was right,” and “Hail Victory.”

198. Mr. Anglin referenced Whitefish in another January 19, 2017 article, “The Daily Stormer was attempting peaceful assembly in Whitefish, Montana when we were shut down by kikes. These people are terrorists. At least most of them are. Paid rioters, Jews and other psychopaths.”

199. Mr. Anglin posted a third article on January 19, 2017 denigrating 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 “procurers of hate and baby-fellatio 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 *Kosher Nostra*, Tanya Gersh, who was trying to extort the mother of Richard Spencer (who doesn’t even say much about Jews to begin with).”

200. “The problem is that these Jews are fighting against an earthquake that no amount of criminal activity or lying can contain,” the article bragged. “It’s the *zeitgeist*, and no Tay-Sachsoid can will himself over this emerging historic spirit. Their tricks aren’t working anymore.”

February 3, 2017 Article

201. Mr. Anglin mentioned Whitefish in an editor’s note attached to an article he published on the *Daily Stormer* on February 3, 2017 opposing the

ACLU: “When the publisher of this website emailed the ACLU about our proposed march on Whitefish, they never replied.”

202. Mr. Anglin signed the editor’s note with “AA,” his initials.

203. Ms. Gersh received harassing communications signed with the initials “AA.”

M. Effects on Ms. Gersh

204. Ms. Gersh has experienced serious and severe emotional and physical distress as a result of Mr. Anglin’s troll storm and related activities. Since the troll storm, she feels like a completely a different person than she was before. Ms. Gersh has experienced panic attacks, goes to bed in tears nearly 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. Gersh’s physical appearance has changed as a result of the harassment from Mr. Anglin’s troll storm and related activities. She has rapidly gained weight and started losing her hair.

206. Ms. Gersh has sought and received medical care to relieve the symptoms of her distress. Her primary care physician has, for the first time, prescribed antidepressants, valium, and acupuncture. She has also started to going to trauma therapy twice a week.

207. Ms. Gersh has been unable to pursue her passions and hobbies. Before the attack, she went ice skating three times a week, worked out almost daily, and went skiing on weekends. Since the attack, physical pain in her shoulders and hips stemming from the extreme distress she has experienced has prevented her from doing any of these things. Ms. Gersh has developed bursitis from carrying herself differently—she has begun compulsively rounding her shoulders in a subconscious effort to defend herself from attack.

V. COUNT ONE

Invasion of Privacy

208. Ms. Gersh incorporates into Count One the allegations of the foregoing paragraphs.

209. Mr. Anglin's conduct as described above and the conduct of his followers who acted at his urging amounts to a course of hounding Ms. Gersh.

210. The conduct of Mr. Anglin and his followers who acted at his urging has become a substantial burden to Ms. Gersh's existence.

211. Mr. Anglin's conduct was wrongful.

212. Mr. Anglin knew that his followers' conduct constituted a breach of duty and, in fact, it was his intended result.

213. Mr. Anglin acted in an extreme and outrageous manner by calling for a troll storm against Ms. Gersh.

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 his followers' emotions.

216. Mr. Anglin's conduct was a substantial factor in bringing about 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. Mr. Anglin's conduct was designed to inflict 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. Mr. Anglin's conduct was extreme and outrageous and went beyond all possible bounds of decency.

223. Ms. Gersh has experienced serious and severe emotional distress as a direct and proximate result of Mr. Anglin's conduct.

224. Mr. Anglin is liable to Ms. Gersh for the emotional distress he 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. Mr. Anglin's conduct constitutes 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. General damages;
 - B. Special damages;
 - C. Compensatory damages;
 - D. Consequential damages;
 - E. Nominal damages; and
 - F. Punitive damages, all in amounts to be determined at trial; and
 - G. Attorney fees, costs, and disbursements, to the extent permitted by law;
- and
- H. Such other and further relief as the Court deems just.

X. JURY DEMAND

233. Plaintiff hereby demands a trial by jury on all issues triable by a jury.

Respectfully submitted,

/s/ John Morrison

Attorney for Plaintiff Tanya Gersh
on behalf of all Attorneys for Plaintiff

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

TANYA GERSH,

(b) County of Residence of First Listed Plaintiff Flathead Co., Mont. (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

See attached.

DEFENDANTS

ANDREW ANGLIN, publisher of the Daily Stormer,

County of Residence of First Listed Defendant Franklin Co., Ohio (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Contains various legal categories and checkboxes.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. Sec. 1332

Brief description of cause: Invasion of Privacy; Intentional Infliction of Emotional Distress; Montana Anti-Intimidation Act; Malice

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 75,000.00 + CHECK YES only if demanded in complaint: JURY DEMAND: X Yes [] No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 04/18/2017 SIGNATURE OF ATTORNEY OF RECORD /s/ John Morrison

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

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Pro Hac Vice Pending