AFFIDAVIT OF ANITA WHITE

Name: Anita White

Occupation: Former Treasurer, Oath Keepers of Josephine County

I, Anita White, swear or affirm:

- I have been going to the Oath Keepers meetings since November 2014. I volunteered to keep
 minutes for their group and have done so until recently. I had never taken minutes for a meeting
 and no guidance was given.
- 2. I was assigned by Joseph Rice (Coordinator) to the position of Treasurer and as Volunteer Coordinator a week after the Sugar Pine Mine operation began because the previous Treasurer and Logistics/Volunteer Coordinator Clinton Chard and Catherine Austin had resigned. Joseph told me that Catherine did not know how to perform the task of Treasurer, and Bruce repeatedly told me there were a lot of complaints about Clinton's performance, with many volunteers refusing to return because of him. I assumed what they told me was accurate but later found these were untrue allegations besmirching the reputations of these two people who put in many hours of volunteer work. The position of Volunteer Coordinator was eventually given to a group in Idaho.
- 3. Although from what I understand, Bruce was the Treasurer for Habitat for Humanity and could have set a system up for me and trained me for this position of Treasure/Bookkeeper but he did not help me whatsoever. All I knew to do was to record everything and that is what I did, but I knew nothing else about being Treasurer.
- 4. I had absolutely no experience as a treasurer or Volunteer Coordinator and no guidance was given whatsoever. I had no idea of my legal responsibilities as treasurer. I was merely a dumb volunteer who wanted to help these miners defend themselves. I was also hoping to acquire some good skills from this position but I acquired no skills. 3 computers were bought for this operation but were never set up the entire operation. I was forced to use my own work computer which was very concerning to me as if something happened to this computer; I would not have been able to make a living.
- 5. I did not realize I had any authority for what was being paid to whom. I would ask Joseph or Joe what I should do. Joseph authorized me to reimburse 40% of gas expenses to non-local volunteers to help them get here with more gas reimbursements given to local volunteers as most all of our local volunteers were not working and it was the only way they could get to the staging are. Bruce and Joseph always turned in a massive amount of gas receipts. Some people such as Joe Santoro and his assistant Darren turned in nothing, paying for everything they did out of their own pocket.
- 6. I was concerned how some of the money (that I knew about) was being used to buy seemingly unnecessary items. People locally and nationally were giving us everything they could spare and

others were volunteering as much as they could. These hard earned donations should not have been so frivolously spent.

- 7. There did not seem to be a coherent system for documenting incoming donation money, spending or even justification for spending. It was completely ad-hoc at the direction of Joseph Rice and Bruce McFarland (Assistant Coordinator), who handed me bundles of receipts for gas, lunches, loans and additional expenses. By the end, Bruce requested many reimbursements for strange items weeks after he had "resigned" from being an Oath Keeper.
- 8. Receipts included gas, lunches, movie tickets, Tuff Truck tickets, groceries, a hard drive for a laptop of one of the tactical people, cigarettes, tires, and 3 computers which were never set up for the entire operation.
- 9. I was forced to use my personal computer the entire operation which I was highly uncomfortable doing as this computer was how I made my living with hundreds of dollars of software on it. If anything happened to this computer I would not have been able to make a living. I told this to Bruce and he did not seem to be concerned.
- 10. I donated hundreds of dollars of food and supplies, and loaned all of my emergency equipment to this operation because they had nothing to begin with. During the whole operation, I put off much of the work by which I pay my rent and bills in order to volunteer. I gave everything I could to help these miners who have been so abused by the BLM for over 30 years.
- 11. I felt uncomfortable with an all cash system as I felt that my reputation was at risk even if I did the best I could and I told my concerns to Joseph in which he had no response. I was given no authority with the bank or Pay pal, but Bruce and Joseph would deposit donations and then some amount of cash was handed to me. I actually did not realize what this volunteer position entailed and felt I was kept in the dark to the knowledge I should have had in order to know my legal responsibility as Treasurer.
- 12. Bruce would give me empty envelopes as he would take all donations out before giving them to me.
- 13. Bruce was in control of the bank account and did not allow me access.
- 14. In the presence of Stewart Rhodes, I told Doug Burrell that I was getting alarming reimbursement requests. Stewart was dismissive, later saying (to the best of my recollection), "My Treasurer yells at me about purchases too". I was surprised at this response to the handling of donations, sensing something was wrong.
- 15. At one point, Bruce handed me about \$6,000 from the bank. The next day, Joseph took \$4000 back, spent a large portion then gave me some of that amount back, with confusion as to how the money was spent.

- 16. Bruce and Joseph would have quiet disputes in which I would be given money by Bruce and then Joseph would take most of it back. This happened 3 to 4 times. Bruce said he would take me to the bank to set me up to make deposits, and then changed his mind. At one point Bruce gave me the checks for the bank, and Joseph took them back the next day.
- 17. There often was talk around the camp of Bruce threatening to quit and Joseph giving him what he wanted to keep him happy. There were disputes about the computers, loaned money, purchases, etc... It was as if Bruce held something over Josephs head and Joseph would give in to what Bruce wanted. This was my conclusion to my observations of their relationship.
- 18. As it is now been brought to my attention, the Oath Keepers (National) bylaws explain the duties of a Treasurer in the organization. The Josephine County Chapter clearly was not operating by those National guidelines.
- 19. In the beginning, Joseph said that Oath Keepers of Josephine County was not a nonprofit organization, but was a business. A couple of days later, he said it is a nonprofit. I was never shown any documentation as evidence of this.
- 20. My Oath Keepers Treasurer email account was under the direct control of Bruce McFarland and hosted on his server. I was concerned to see that a lot of emails disappeared all at once, as if they were intentionally removed. These emails pertained to the ongoing problems Vik and Laurie were having with Bruce and of Joseph ignoring the issues Vik and Laurie were highly concerned about. I have no idea how many emails disappeared before I had a chance to read them.
- 21. I was highly concerned about all of the issues at the staging area until Joe Santoro arrived and put a system in place, but Joseph was confrontational in certain areas with Joe so Joe had to back off, one of which was the scheduling of volunteers. Joe Santoro was showing me how to put a schedule together when it was taken away by Joseph. There was never a local volunteer schedule ever put together and it was very difficult for many us that were there every day. We were never given any days off as there was no schedule. The local people that wanted to volunteer were not being utilized properly. I offered to Joseph to make calls and put together a schedule but he declined my offer. One gentleman did not get a day off until he had to go to the hospital. This same gentleman has serious health issues and he should not have been put in the position of no days off. Volunteers should never be worked to a point of their health being in jeopardy as was done to me and this gentleman, especially unnecessarily.
- 22. Bruce came on the property quite often only to talk with Kathleen Wilson, (who apparently is a mine owner possibly locally and definitely in Alaska), as they were putting together a business deal to buy mining claims and investors were being drawn together which were basically Oath Keeper local leadership. I am unaware of any other people involved in this deal. Kathleen Wilson never came to volunteer and help but only to talk with Bruce about their business deals. Apparently she was never vetted with security but yet had a tent on site. I was concerned how rude she was to me and another volunteer and even more concerned that Bruce said nothing to her when she was so rude right in front of him.

- 23. I was highly concerned that Bruce, as Assistant Coordinator, saw no problem with making business deals on this non-profit organization's staging area. It seemed to me to put this very important operation in jeopardy. Bruce never seemed to be concerned with my questions and need of help. I did not understand why he was Assistant Coordinator. I found there was no leadership from our local Chapter.
- 24. At the end of the operation, I offered to Joseph to collect all of the numbers on anything that was loaned to this operation by the local people and to call them so that they could have their items back post haste as most of these items were in need by the owners. Joseph said he did not want me to do that and this loaned equipment was put into the Conex for another month. I was lucky enough to find many items of people I knew and returned these items to them and they were very thankful to get them back. I even had to make a trip to the mine to retrieve loaned equipment. I do not believe I should have had to do that.
- 25. I do not regret helping the miners but I regret helping Joseph and Bruce because it seems that they have ulterior motives of future financial (and questionable) gain. I have absolutely no problem with the men and women coming across the country who put their lives on hold to volunteer, receiving skills that they can offer as a business as security people. I am thankful that they have gotten such good skills out of their kind sacrifice for our local miners, but I am not good with Bruce and Joseph using this operation and the volunteers the way they seem to have done. Not all agree with me but I was privy to more than the average volunteer.
- 26. Another issue was a 21 year old young man named Sean Robinson from Utah, drove out here and donated over \$200 worth of groceries. After 2 weeks of very hard work became sick and went home. Joe Santoro invited him back when he was ready to come back. 3 weeks later he came back (after Joe left to go home to Colorado) and after he drove all the way from Utah, he was told to leave. He did absolutely nothing to deserve this. He spent many hours to get here as well as the cash he spent on gas (over \$800 of which I was able to reimburse approx. \$400) This kid could barely afford what he did. This is so shameful for the Oath Keepers to have this to happen.
- 27. Another concern I have is the emails I was inadvertently included in on as I received emails as Treasurer. Many of these emails were mysteriously deleted (by a certain person who had the capability to do so). I became aware of Vik Nokhoudian's concerns about Bruce using Vik's intellectual property in his side business deals, and then of Laurie's concerns of a similar confrontation with Bruce. Vik made it clear that we had security issues related to the Sugar Pine operation. I was very concerned with their issues with Bruce and even more highly concerned with the way Joseph was denigrating Vik and Laurie. He was strangely defending Bruce instead of resolving the problems as they arose. Through these emails I learned that problems began months before this Sugar Pine Mine operation started. Because of my experience with Bruce at the Staging area and reading this email exchange between Joseph and Vik, I saw clearly that Joseph was in the wrong. He was trying to cloud up and confuse the situation insulting Laurie and Vik in the process.

- 28. When I became highly concerned with all of the strange requests for reimbursements by Bruce and everyone requesting gas reimbursements and my not knowing what to do as no guidance was given, I called Joseph and told him of my concerns. His response was to take all records and the remaining money from me. I thought his intention was to check and verify my concerns but he kept everything without saying a word to me one way or the other. In my opinion his response did not seem normal. When I offered to input the book keeping data in Tanya's new Access system, he did not want me to do this, and Tanya was left to do this hard task.
- 29. I only learned that Bruce had resigned from Oath Keepers on 5/16/2015. Due to the emails disappearing from my account, it may be that a notification to this effect was also removed. After his resignation, Bruce continued submitting reimbursement receipts.
- 30. After all of these occurrences and experiences, I feel that I will not volunteer, give or help Oath Keepers again.

I SWEAR OR AFFIRM THAT THE ABOVE AND FOREGOING REPRESENTATIONS ARE TRUE AND CORRECT TO THE BEST OF MY INFORMATION, KNOWLEDGE, AND BELIEF.

Date

Anita White

STATE OF OREGON COUNTY OF JOSEPHINE

I, the undersigned Notary Public, do hereby affirm that Anita White personally appeared before me on the \(\frac{1}{4}\) day of \(\frac{1}{2}\) \(\frac{1}{2}\), and signed the above Affidavit as her free and voluntary act and deed.

Notary Public

MARVIN MARCUS RANSOM IV
NOTARY PUBLIC-OREGON
COMMISSION NO. 924597
MY COMMISSION EXPIRES JANUARY 29, 2018