

AFFIDAVIT OF VIKEN NOKHOUDIAN

Name: Viken Nokhoudian

Occupation: Web and Application Developer

I, Viken Nokhoudian, swear or affirm:

1. That I am the primary inventor and patent applicant for Rescue Responder, an Early Warning System for persons in crisis. I am also the creator of the Oath Keepers of Josephine County web site, which I donated to the Josephine County Chapter of Oath Keepers for the sole use of the Chapter.
2. In 2014, I was the web developer for a project called "Love to Grow", which was paid for by the taxpayers of Josephine County. Bruce McFarland was involved with fundraising duties. On January 24, 2015, I had to send Bruce a warning due to his taking a copy of the site for his own business use at <http://ItsTheClimate.com> where he was attempting to sell email hosting services. I let him know it is not "appropriate" to be taking the group's copyrighted site without prior permission. Caught in the act, he pulled the site down.
3. In December 2014, responding to calls for fundraising for the Josephine County Chapter of Oath Keepers, I presented a project to the general meeting that I was developing called Rescue Responder, an emergency warning system that would be well suited to Oath Keepers use. I showed a brief demo on my mobile phone, as development was already underway. I outlined the conditions under which I would form a financial alliance with the Chapter. The Chapter and Oath Keepers National would help with initial fundraising to get the project developed, in the amount of \$15,000 and in return would receive a portion of the revenue generated in perpetuity. Joseph Rice, Bruce McFarland and the rest of the Members said they thought it a wonderful idea. Joseph said he would put me in touch with the National Oath Keepers officers to pitch the project. I later learned from others that in a conference call with National, with Joseph Rice in attendance, Bruce McFarland had pitched my project to National. I was not invited to the call, nor was I informed about it by them. It appears that they had attempted to keep it secret from me.
4. On or about April 21, 2015, while I was at the Sugar Pine Mine staging area, a member of the Jackson County Oath Keepers mentioned in passing that he was making a deal with Bruce McFarland to obtain a copy of the website I had created for the Josephine County Oath Keepers.
5. On or about the 15th of April, Bruce McFarland took advantage of a private moment to proudly inform me that the Board of Directors of Koapt Inc. had approved his selling it to Oath Keepers. Later, one of the Board of Directors and investor in Koapt, Roy Lindsay, arrived at Staging with his wife. I asked if that Board meeting had occurred and he said it had not, that there was nothing done with Koapt for the past year. I let Roy know what Bruce had said.
6. On or about the evening of April 22, 2015, Bruce McFarland called me by phone to inform me he was making a deal with Stewart Rhodes of Oath Keepers National to get himself paid \$15,000 to take the website and distribute it to other chapters and also to take his own Koapt project and my Rescue Responder project and incorporate them as part of the cash deal. He stated that he would be keeping the cash.
7. I informed Bruce that this was unacceptable, that he had no authority or permission to take my work or my Rescue Responder project and sell it off as his own personal business deal. I

told him what he was doing constituted theft of property belonging to others. When I insisted Joseph Rice be involved in the conversation, Bruce angrily screamed, "That's it, you're out!" He held the position of Assistant Coordinator and I understood this to mean he was kicking me out of my position in Oath Keepers. I ignored his outburst as he did not have the authority to remove me. The next day, he pretended nothing had happened between us.

8. I informed Laurie Johansen, a co-inventor on the Patent for the Rescue Responder Early Warning system, that Bruce had told me he was making deals to sell off copies of the Oath Keepers website and the Rescue Responder system and had excluded me from the project. She did not believe me, due to Bruce's convincing portrayal of himself as just a friendly, helpful guy and she said that there must have been a misunderstanding. But, at the Oath Keepers meeting that week, she told me that she had asked Bruce point-blank about it and that he admitted it.
9. Joseph Rice insisted to me that Bruce was not getting any money from the deal, trying to frame it as Bruce 'donating' his efforts. Yet, Bruce affirmed in an email dated 5/15/2005 that he was, in fact, getting paid by National, that he would convince other Oath Keepers to do the work for free by calling it an "open source" project so that he could keep the money himself, while kicking some back to Joseph for the local Chapter. Joseph Rice demonstrated his willingness to lie to cover for Bruce while Bruce continued slipping up and revealing the details including Joseph's financial interest for the Chapter in the deal.
10. While at Staging, there were several instances in which personnel were alarmed at apparent hacking of our electronic devices and interception of our digital communications (phone and computer). I confirmed that this data interception was happening. Bruce McFarland was responsible for providing "secure" web, email and data services. I personally knew of a major security hole in the server hosting he provided that would make it easy for outside parties to compromise our communications and infiltrate our computers. I had warned Bruce about it repeatedly in the previous year, since I was developing the site on his server under unsecured conditions. He had not taken any action to close the security hole in spite of repeated warnings from me.
11. I became aware that copies of the Oath Keepers website were appearing in other locations, specifically three websites under Bruce's control. I then discovered that Bruce was the one taking copies of the work from his supposedly "secure" server and re-using it for his own outside business purposes. Bruce hastily took down two of those websites and apologized in an email when I alerted him that I had discovered them. A third, at <http://sightingscentral.com> remains live since I did not mention it. Note that Bruce McFarland, with special access to the content on his server, was taking our copyrighted Oath Keepers intellectual property and repurposing it for his own business use with slight modifications. This caused me a great deal of alarm, since we were entrusting our "secure" email accounts to his server as well. The emails flowing through Bruce's hands contain highly sensitive information regarding Patriot groups and business activities.
12. While at Staging, I became aware that personnel were concerned about possible hacking of our PayPal account, due to a strange woman's name appearing on the donation email receipts from it. I was also aware that Bruce McFarland had personal access to the account. This heightened my concern about Bruce deceiving Leadership regarding internet security. Given Bruce's past history of pilfering informational assets from other projects, I became more alarmed. I had warned Joseph Rice of this history long before the Sugar Pine operation but he was dismissive and gave Bruce privileged access to the Chapter's finances anyway.

13. When I warned Joseph Rice of both the security problem as well as Bruce's ongoing activities to steal and profit from assets that were not his, Joseph retaliated against me. He would not allow my request for a leadership meeting to look at the evidence. I sent Joseph a detailed PCI security scan demonstrating the server security problem. He lied to his Leadership team in an email, insisting I had presented no evidence. The scan and an explanation of its significance will be provided upon request.
14. On April 27, 2015, Bruce McFarland provided me with a video in which George Backes and Danny VanDerschelden announce they have a court date in about 45 days and express their appreciation for our help. Joseph Rice informed me by text message that I was not to post this video at the Josephine County Oath Keepers website and that I was to keep it secret. Instead, the following weeks of postings on the web site as directed by Joseph Rice ramped up the sense of 'crisis' and calls for donations. At that point, I began to see more indications of a false sense of 'crisis' propagated for fundraising purposes. I believe the personnel at the mine were kept agitated and alarmed by reports of armed Federal agents swooping into the area, though I never saw evidence supporting this claim.
15. I insisted to Joseph Rice that I wanted Due Process, that is, a small, private meeting of only the people directly involved: Joseph Rice, Bruce McFarland, Stewart Rhodes, Laurie Johansen and Myself, along with three witnesses. As I said in my email of 5/17, *"I have requested Due Process, in which we bring Bruce, Stewart Rhodes, Laurie Johansen and a couple of other people together to GET TO THE TRUTH."* Joseph Rice refused repeatedly in writing to allow the discussion.
16. When Stewart Rhodes prepared to visit our Chapter, Joseph Rice 'suspended' my membership on 5/18 and threatened to have me physically removed if I were to appear at any Oath Keepers event. He again asserted, *"you have yet to provide any written documentation or evidence supporting your position"*. This was a lie, since I had already provided the detailed server scan report and had offered to present a great deal more in person. As I stated in my response that same day, *"I am prepared to provide documentation of the assertions I have made and would have LIKED to do so in a small group setting."* Joseph's desperation to prevent a simple, honest discussion of the issue had escalated to threats of force against me.
17. Joseph Rice sent me an email on 5/28/15 indicating he would hold a Leadership review of my concerns in a few weeks but that I would NOT be allowed to present any of my evidence or witnesses, that Joseph alone would choose what to present, selected from only the emails in which we argued about the situation. Joseph thus demonstrated his extreme hostility to Truth and to Due Process, warning me in advance it would not be a fair hearing, at which point I tendered my resignation from the Chapter. Joseph then said that, as a result of my resignation, I would not be allowed to attend the hearing.
18. Joseph informed me, in writing, of Bruce McFarland's resignation from Oath Keepers on 5/16/2015, long before my own resignation, stating, *"Bruce has resigned from Oath Keepers completely. Bruce is not in leadership, nor affiliated with Oath Keepers any longer."* In spite of this assertion in the email from Joseph, Bruce continued to be involved in the daily operations of the Oath Keepers, as I observed and as others informed me.
19. Weeks after the Sugar Pine operation ended, Joseph Rice held a private, star-chamber style hearing regarding my concerns about Bruce McFarland's activities. Joseph hand-picked the attendees, including Bruce McFarland (who had allegedly resigned) and his closest loyalists, while preventing me from attending. I believe Joseph hand-picked what 'evidence' they would review in order to frame the situation most favorably to Bruce while preventing review

of the evidence and witnesses I wished to present. Predictably, Joseph Rice framed this situation to cast me as the 'bad guy' and exonerate Bruce, then used that to (as he states in his email of 6/12/15) send a recommendation to Oath Keepers National that I should be barred from the organization entirely.

20. In Joseph Rice's email of 6/12/15 he admits that I gave warning to the leadership of the Josephine County Oath Keepers regarding Bruce's security flaws, that Rescue Responder is in fact my property, that they did in fact pitch my Rescue Responder to National without my being present, that he Joseph Rice, along with Rob Lee, Bruce McFarland, Larry Cook, Mitch Williamson and Doug Burnell were witnesses and were present when this pitch was made, and that they were making my emails freely available to the media. It is my opinion that they only put me, as a whistleblower, on trial and then found me "guilty" of reporting wrongdoing. Furthermore, they never even considered any of my evidence regarding Bruce's wrongdoing.

Further affiant saith not.

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

June 23, 2015 Viken Nokhoudian

Date Viken Nokhoudian

STATE OF OREGON
COUNTY OF JOSEPHINE

I, the undersigned Notary Public, do hereby affirm that Viken Nokhoudian personally appeared before me on the 23rd day of JUNE 2015, and signed the above Affidavit as his free and voluntary act and deed.

Candy Rosenberg
Notary Public

