

6. I recall that in connection with discussing speaking fees, Dr. Carrier advertised on his website that he lived in Northern California. When I checked the historical iterations of his website in preparing this declaration, I learned that this statement appeared on his website at least as recently as March 2016. A true and correct copy of the page as it appeared on March 22, 2016 according to the website archive.org is attached hereto as **EXHIBIT A**. Although the article suggests booking Dr. Carrier for speaking engagements “at least three months in advance, and preferably six months or more,” there is no mention that he would be moving from California.

7. There is also a widely-read article in which Dr. Carrier used his website to solicit a date. Again, this post mentioned living near Sacramento California. This article was published on richardcarrier.info on April 25, 2015. I have attached a true and correct copy hereto as **EXHIBIT B**.

8. Dr. Carrier also mentioned living and working in California in a July 8, 2011 post complaining about Amazon’s policy of charging sales tax to California residents. I have attached a true and correct copy of that post hereto as **EXHIBIT C**.

9. My belief that Dr. Carrier lived in California was also based on conversations I had with Orbit blogger Greta Christina, who lived in the San Francisco Bay Area and socialized with Dr. Carrier in the area, and also Heina Dadabhoj, who lives in Southern California but saw Dr. Carrier at events within the state of California.

10. I also believed Dr. Carrier lived in California because he worked with the head of Camp Quest in California. I learned this from the e-mail attached hereto as **EXHIBIT D**.

11. The first information I received that indicated Dr. Carrier may have moved to Ohio, was the fact that the lawyer who sent me the July 26, 2016 cease and desist letter attached to the Complaint as Exhibit 7 had an Ohio address. However, I did not know for certain that Dr. Carrier had moved to Ohio until I was served a copy of the Summons and Complaint in this matter.

12. I am part of a group of writer/contributor to a website located at the domain <the-orbit.net> which is a collective of social justice oriented bloggers.

13. The Orbit, which has only been in existence since March of 2016 has no formal structure. The focus of the website is on distributing information.

14. The Orbit is hosted on Amazon cloud servers.

15. The Orbit is not incorporated or otherwise organized in Ohio. It does not own any bank accounts or own and real property in Ohio.

16. The domain <the-orbit.net> was registered from within the State of Minnesota. Any funds held on behalf of the Orbit are held in a Minnesota bank account.

17. I am familiar with the allegations against Dr. Carrier, including the incidents I reported on in my article. There are six in total.

- a. One occurred at Skepticon in Missouri;
- b. One occurred after a Secular Student Alliance event at a location unknown to me;
- c. An incident that Dr. Carrier blogged about which took place at a location unknown to me;
- d. Incidents that occurred mostly through e-mail between Dr. Carrier when he was living in California and a woman who was also living in California;
- e. Incidents that occurred partially at a party in California and partially through e-mail between Dr. Carrier when he was living in California and a woman living in Minnesota; and
- f. The incident I referred to in my Facebook post which occurred in California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 12/1/2016

DocuSigned by:
Stephanie Zvan
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Stephanie Zvan