#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

DR. RICHARD CARRIER

Plaintiff, : Case No. 22:16-cv-00906-MHW-EPD

-vs- : JUDGE Michael H. Watson

FREETHOUGHTBLOGS NETWORK, : PLAINTIFF'S BRIEF IN OPPOSITION
PAUL Z. MYERS, PH.D., THE ORBIT, : DEFENDANTS' MOTION TO DISMISS

STEPHANIE ZVAN, SKEPTICON, INC., : FOR LACK OF PERSONAL

LAUREN LANE, and : <u>JURISDICTION AND IMPROPER</u>

AMY FRANK-SKIBA : <u>VENUE</u>

Defendants

Plaintiff **Dr. Richard Carrier** (hereinafter "Dr. Carrier" or "Plaintiff"), hereby submits the following Brief in Opposition to Defendants' Motion to Dismiss for Lack of Personal Jurisdiction pursuant to FRCP 12(b)(2) and for Improper Venue pursuant to FRCP 12(b)(3).

#### I. INTRODUCTION

Plaintiff's Complaint contains sufficient allegations against the Defendants to state a prima facie showing of this Court's personal jurisdiction over Defendants. This Court enjoys personal jurisdiction over the non-resident Defendants pursuant to Ohio's long-arm statute, codified as Ohio Revised Code 2307.382, and the Due Process Clause of the Fourteenth Amendment to the United States Constitution. Defendants committed acts outside of the state of Ohio, intended to cause and causing injury in the state, including but not limited to the intentional and malicious publication of defamatory statements of and concerning an Ohio resident, whose professional activities are centered in the district. Defendants' contacts with Ohio organizations and the Plaintiff, requires they defend the action in this jurisdiction, which comports with due process.

This Court should also deny Defendants' Motion based on their argument that this Court lacks proper venue. Here, this Court enjoys venue under 28 U.S.C. § 1391(b)(2), because all or a substantial portion of the events that gave rise to Plaintiff's claims accrued within the state of Ohio, including Defendants' express targeting of the Plaintiff in the state of Ohio, Defendants' publication and republication of the defamatory falsehoods in the district, the damage to Plaintiff's reputation suffered in the district, and Defendants' tortious interference with Plaintiff's business expectancies in the district. Absent compelling circumstances, courts afford the plaintiff's choice of forum strong deference. Maintaining the action in various other districts from which the Defendants reside (including Minnesota, Missouri, and Arizona) may be more convenient for individual Defendants, but the balance of convenience does not sufficiently favor any one district over Ohio. Venue is therefore proper.

#### II. FACTUAL BACKGROUND

Plaintiff, Dr. Carrier, is a Ph.D. in the history of philosophy from Columbia University, and author of numerous scholarly books and articles published by reputable publishing houses. Dr. Carrier has become well known to the public as a professional writer, lecturer, and teacher, and has created for himself a unique public personality and image. As all Defendants were well aware, Dr. Carrier has had professional relationships and valid ongoing business expectancies with Ohio organizations, among them the Secular Student Alliance ("SSA") and Camp Quest, both headquartered in Columbus, and numerous other Ohio organizations. *See* Exhibit 1, Affidavit of Dr. Richard Carrier in Support of Plaintiff's Brief in Opposition to Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue (hereinafter, "Carrier Aff."), pp. 4-5, at ¶¶ 25-28, *Exhibits D-F, and Exhibit H*, and p. 8, at ¶ 42, and p. 10, at ¶ 51, and p. 12, at ¶ 69, and p. 14, at ¶ 79. These organizations have been his principal source of speaking

and direct sales income. By June 1, 2016, the Plaintiff completed his permanent relocation to Ohio. *See* Carrier Aff., p. 7, at ¶ 36). Dr. Carrier's move to Ohio from California was highly publicized, for months ahead of time. Announcements were clearly disclosed, and well publicized on the website belonging to Defendant Freethought Blogs Network ("FtB" or "FreethoughtBlogs"), Meetup.com, Dr. Carrier's blog, his website, his Facebook® and Twitter® pages, the booking page on his personal website, and by word of mouth, and various other manners. *See* Carrier Aff., pp. 5-7, at ¶¶ 29-35, *Exhibits I-P*, & *BB*.

Defendant Amy Frank-Skiba ("Frank-Skiba") is the former president of the Arizona State University chapter of the SSA. She is the author of a false and defamatory June 15, 2016 Facebook® post, and a gofundme® campaign on which she published additional false, defamatory, and outrageous allegations. In her Facebook® post, Defendant Frank-Skiba falsely alleged very serious charges concerning an alleged 2015 incident of sexual assault and sexual harassment. Her statements were expressly aimed at the Ohio-based Camp Quest, Ohio-based volunteers and parents, the Ohio-based wife of the Executive Director of the SSA, who is the head of Camp Quest, and the Ohio-based Plaintiff. *See* Complaint, Dkt. No. 1, pp. 15-16, at ¶¶ 46-48, *Exhibit 4*. On information and belief, Frank-Skiba actively monitored Dr. Carrier's Facebook® wall, prior to publishing her false statements, and would have seen the myriad announcements concerning his relocation to Ohio. *See* Carrier Aff., pp. 14-15, at ¶¶ 79-80.

Defendant The Orbit ("The Orbit") is a media site committed to, according to its mission statement, social justice, providing a platform for writing, discussion, activism, collaboration, and community. The Orbit exercises content control over the blogs it hosts. Defendant Stephanie Zvan ("Zvan") is a member of The Orbit, and a newspaper writer. Defendants Zvan and The Orbit authored a June 20, 2016 online story entitled, "Summarizing the Current

Allegations Against Richard Carrier" in which they claim personal knowledge of untrue allegations of sexual harassment. *See* Complaint, Dkt. No. 1, pp. 11-13, at ¶¶ 37-38, *Exhibit 2*.

Defendant Skepticon, Inc. ("Skepticon") was co-founded in 2008 by Defendant Lauren Lane ("Lane"), who currently serves as president, and has become one of the largest skeptic and secular conventions in the United States. Defendants Skepticon and Lane authored a June 20, 2016 story entitled, "Keeping Skepticon Safe: Richard Carrier To Be Banned." The article levels false and defamatory charges against Dr. Carrier concerning sexual harassment. *See* Complaint, Dkt. No. 1, pp. 14-15, at ¶¶ 42-44, *Exhibit 3*.

Defendant FreethoughtBlogs was co-founded in 2011 by member and Defendant Paul Z. Myers, Ph.D. ("Myers") to host Defendant Myers' blog, *Pharyngula*, and to host other blogs in his field (among them, Dr. Carrier's blog wherein his planned relocation to Ohio was announced). Defendant FreethoughtBlogs exercises content control over the blogs it hosts. *See* Complaint, Dkt. No. 1, p. 3, at ¶ 5, and p. 9, at ¶¶ 30-31, and p. 18, at ¶ 57. Defendants FreethoughtBlogs and Myers authored a June 21, 2016 story entitled, "Richard Carrier's blog," and authored the June 26, 2016 story entitled, "The FtB Ethics Committee on Richard Carrier." Their articles recount and republish untrue allegations of sexual harassment, and accuse Dr. Carrier of "*persistent*" sexual behavior "*in defiance of specific requests that he cease*." *See* Complaint, Dkt. No. 1, p. 8, at ¶¶ 26-28, and pp. 17-18, at ¶¶ 53-56, *Exhibit 1, and Exhibit 5*.

Defendants' statements were intentional and tortious, calculated to cause injury in Ohio. Defendants' stated purpose was to sever Dr. Carrier's professional affiliations with the SSA and with Camp Quest, and encouraged boycotts unless and until their purpose was realized. See Complaint, Dkt. No. 1, *Exhibit 4*. Failing to check neither facts nor alibis (*See* Carrier Aff., p. 16, at ¶ 84), Defendants' wrongful conduct was expressly aimed at Ohio resident Dr. Carrier, and

at Ohio organizations, The SSA, and Camp Quest. That Defendants knew Dr. Carrier's residence moved to Ohio doesn't merely rest on conjecture or supposition, but on well-pled facts. *See* Carrier Aff., p. 8, at ¶ 41, and p. 12, at ¶¶ 68-69, and pp. 14-15, at 79-81. And it can be reasonably characterized as the Defendants' intent to interfere with Dr. Carrier's business affiliations with the SSA and Camp Quest. Defendants intended their out-of-state conduct to reach and harm Dr. Carrier's business operations in Ohio. Defendants' express aim thus can be said to have reached into Ohio.

The focal point of the damage was Ohio, and Defendants' conduct therefore fulfills the requirement of causing a consequence in Ohio. Owing to Defendants' false and defamatory statements, the SSA will no longer extend approval of Dr. Carrier's speaking engagements at SSA affiliate events and conferences, nor of Dr. Carrier's affiliation as brand endorser, nor allow the sale of his books as a vendor at SSA national conferences. Also owing to Defendants' wrongful conduct, Camp Quest suspended several of Dr. Carrier's promotional and business projects, including an educational game, a science experiment expected to generate considerable publicity and a peer reviewed academic journal publication expected to advance the Plaintiff's professional reputation. *See* Carrier Aff., p. 16, at ¶ 84-86. Moreover, Defendant FreethoughtBlogs blocked access to Dr. Carrier's blog, blocked Dr. Carrier from publishing content, and blocked the public's access to all previous publications at FreethoughtBlogs, seriously disrupting search engine visibility to market his body of work. *Id.*, p. 17, at ¶ 87.

Defendants reasonably foresaw that the brunt of the injury would be felt in the forum state of Ohio. On well-pled facts, the Defendants knew Dr. Carrier relocated to Ohio, and knew the SSA and Camp Quest were both headquartered in Ohio. By expressly urging two Ohio organizations to end their affiliation with him, Defendants' intent was to do intentional harm to

Dr. Carrier's business in Ohio and to his professional reputation therein. When viewed in a light most favorable to the Plaintiff, Dr. Carrier demonstrated that Defendants intentionally and tortiously sought to inflict harm to his profession, and knew that the effects of their conduct would be felt in Ohio, where Dr. Carrier lives and works.

On or about July 6 and July 26, 2016, the Plaintiff, through his Ohio legal counsel, sent cease and desist letters, with demands for a written retraction, to all Defendants by Certified U.S. Mail. *See* Complaint, Dkt. No. 1, p. 18, at ¶ 58, *Exhibits 6-9*. Defendants refused Dr. Carrier's demands. *See* Carrier Aff., pp. 8-9, at ¶¶ 44-48, and pp. 10-11, at ¶¶ 52-54, and p. 13, at ¶¶ 72-74, and pp. 15-15, at ¶¶ 81-83, and p. 12, at ¶¶ 68-69, and pp. 14-15, at 79-81

On or about July 30, 2016, Defendant Zvan posted a follow-up response, in which she sustained her June 20 attacks, and claimed personal knowledge of a sixth incident, also alleging sexual harassment. *See* Complaint, Dkt. No. 1, p. 19-20, at ¶ 66, *Exhibit 17*. Zvan's statements were more than mere opinion or rhetoric. Rather, in her July 30 statement she referred to her previous story as "... *conservative in its presentation of facts*..." *Id*. (emphasis added).

Subsequent to Plaintiff's cease and desist letter, Defendant Frank-Skiba launched a gofundme<sup>®</sup> campaign, published a verbatim copy of the letter, and posted further false and wrongful allegations. *See* Complaint, Dkt. No. 1, pp. 20-22, at ¶¶ 70-73, *Exhibit 18*.

On or about September 1, 2016, Defendants Skepticon and Lane replied to Plaintiff's cease and desist letter, through counsel, sustaining and reaffirming their June 20 accusations, and threatening to counter-sue Dr. Carrier. *See* Complaint, Dtk. No. 1, p. 22, at ¶¶ 74-75, *Exhibit 19*.

As of August 15, 2016, Defendant's Internet articles garnered extensive comments and reactions. Defendant Zvan's July 30 follow-up post received numerous Facebook<sup>®</sup> likes, including one from The Orbit member, co-owner, and Ohio resident, Miri Mogilevsky. In

substantial numbers, readers believed to be true allegations of sexual harassment, a crime involving moral turpitude, and statements concerning Dr. Carrier's professional acumen and character. Defendants' defamatory statements continue to be reported, repeated, and re-broadcast in Ohio and nationwide. *See* Carrier Aff., p. 4, at ¶ 24, *Exhibit Z*. Defendants' statements stigmatize Dr. Carrier as guilty of serious criminal offenses, and allege behavior incompatible with conduct becoming his profession. On well-pled facts, Defendants were aware, when they made their tortious statements, of Dr. Carrier's ongoing business relationships, including those with the SSA, the SSA's hundreds of affiliates, and with Camp Quest, and were aware of Dr. Carrier's permanent relocation to Ohio. *See* Carrier Aff., pp. 4-5, at ¶¶ 25-28, *Exhibits D-H*. As Defendants' contacts with Ohio proximately resulted from their own actions that created a substantial connection with Ohio, Defendants must reasonably have anticipated being haled into Court in Ohio to answer for the truth of their wrongful statements.

Dr. Carrier's claims arise not only from defamatory statements, but Defendants' statements speak specifically to affiliations as between Dr. Carrier and two organizations well known by all Defendants to be headquartered in Ohio. As Defendants repeatedly assert the defense of truth, the merits of the Plaintiff's claim address the very same issue, and seek to prevent future conduct and remedy the harm caused. More specifically, Dr. Carrier argues that Defendants' statements are malicious and false, and that his professional reputation was slandered. Accordingly, and also because the Plaintiff has alleged special damages suffered in Ohio (*See* Complaint, Dkt. No. 1, p. 26, at ¶¶ 91-93), the action can be said to have arisen from Defendants' Ohio-related activities.

#### III. LAW AND ARGUMENT

## A. Standard of Review for Defendants' Civ. R. 12(b)(2) Motion to Dismiss for Lack of Personal Jurisdiction

On a motion to dismiss for lack of personal jurisdiction under Civ. R. 12(b)(2), Plaintiff bears the burden of proving personal jurisdiction. *Neogen Corp. v. Neo Gen Screening, Inc.*, 282 F. 3d 883, 887 (6<sup>th</sup> Cir. 2002). A court deciding a Rule 12(b)(2) motion may follow one of three procedural paths: (1) the motion may be decided upon affidavits alone; (2) the court may permit discovery to assist in rendering its decision; or (3) the court may conduct an evidentiary hearing to resolve any factual questions which may have been presented. *Theunissen v. Matthews d/b/a Matthews Lumber Transfer*, 935 F.2d 1454, 1458 (6<sup>th</sup> Cir. 1991). When there is no evidentiary hearing, "Plaintiff's burden is relatively slight." *Union Central Life Insurance Co. v. Balian*, 2011 WL 1753620 (S.D. Ohio) citing *American Greeting Corp. v. Cohn*, 839 F.2d 1164, 1169 (6<sup>th</sup> Cir. 1988). "The plaintiff needs to make only a *prima facie*, or threshold, showing that personal jurisdiction exists." *Theunissen* at 1458. "Without an evidentiary hearing, the court may consider only the pleadings and affidavits submitted by the parties." CompuServe v. Patterson, 89 F.3d 1257, 1262 (6<sup>th</sup> Cir. 1996). Notably, the Court is obligated to disregard any affidavit or factual assertions presented by the Defendants in this case:

A court disposing of a 12(b)(2) motion does not weigh the controverting assertions of the party seeking dismissal, because we want to prevent non-resident defendants from regularly avoiding personal jurisdiction simply by filing an affidavit denying all jurisdictional facts.

Reynolds v. International Amateur Athletic Federation, 23 F.3d 1110, 1459 (6th Cir. 1994).

Differences in the facts and allegations made by the Plaintiff and Defendants must be construed in favor of the Plaintiff. "If there is a discrepancy between the plaintiff's and defendant's allegations, the court must consider the information in a light most favorable to

plaintiff." *CompuServe* at 1262. If the plaintiff makes its *prima facie* showing of jurisdiction, then "the motion to dismiss should be denied notwithstanding any controverting presentation by the moving party." *General Envt'l Science Corp. v. Horsfall*, 753 F. Supp. 664, 669 (N.D. Ohio 1990) (internal citation omitted). "This essentially means that the Court must view the jurisdictional evidence in a light most favorable to the plaintiff." *Goldstein v. Christiansen*, 70 Ohio St.3d 232, 237, 638 N.E.2d 541. Dismissal for lack of jurisdiction is proper only if all the specific facts relied upon by plaintiff collectively fail to state a *prima facie* case for jurisdiction. *Kerry Steel, Inc. v. Paragon Industries, Inc.*, 106 F.3d 147, 149 (6<sup>th</sup> Cir. 1997). Here, therefore, for the purpose of deciding Defendant's Motion to Dismiss, the facts must be viewed in a light most favorable to the Plaintiff.

To exercise personal jurisdiction over a defendant, a federal court sitting in diversity jurisdiction must find that (1) the long-arm statute and the applicable rule of civil procedure confer jurisdiction, and that (2) exercise of personal jurisdiction would not deprive the defendant of the right to due process under the Fourteenth Amendment to the United States Constitution.

Theunissen at 1459. Here, the Plaintiff has met both requirements.

### B. Ohio's Long-Arm Statute Permits the Exercise of Personal Jurisdiction Over Defendants

To justify the exercise of jurisdiction, a court must determine whether the state's long-arm statute is satisfied and whether granting jurisdiction would deprive the defendants' right to due process. *Goldstein* at 237. Ohio's long-arm statute, R.C. § 2307.382(A)(6), provides in pertinent part:

- (A) A court may exercise personal jurisdiction over a person who acts directly or by an agent, as to a cause of action arising from the person's:
- (6) Causing tortious injury in this state to any person by an act outside this state committed with the purpose of injuring persons, when he might

reasonably have expected that some person would be injured thereby in this state;

When out-of-state statements concern Ohio activities and have the specific intent of harming an Ohio resident in Ohio, jurisdiction is proper under both Ohio's long-arm statute and the 14<sup>th</sup> amendment. *Kauffman Racing Equip., L.L.C. v. Roberts*, 126 Ohio St. 3d 81. Under Ohio R.C. § 2307.382(A)(6), and Civ.R. 4.3(A)(9) a court is permitted to exercise personal jurisdiction if the above requirements are met. *Clark v. Connor*, 82 Ohio St.3d 309, 313, 1998 Ohio 385, 695 N.E.2d 751.

In this case, the evidence supports a *prima facie* showing that Defendants intended to cause harm, or reasonably should have known their actions would cause harm in Ohio, and that this Court has personal jurisdiction over all Defendants. The Plaintiff alleged claims for defamation per se (Counts I and II), tortious interference with a business expectancy (Count III), and intentional and negligent infliction of emotional distress (Counts IV and V). The Plaintiff asserts each of these claims against each Defendant individually, based upon their isolated conduct.

Defendants contend that Ohio's long-arm statute does not confer personal jurisdiction because their wrongful, tortious statements were not directed or published here. But even if Defendants' statements were not made within the territorial boundaries of Ohio, Defendants' false statements were most certainly received in Ohio, as the Plaintiff has sufficiently pled. The tort of libel occurs in the locale where the offending material is circulated by the defendant to a third party. *Keeton v. Hustler Magazine, Inc.*, 465 U.S. 770, 777, 104 S.Ct. 1473, 79 L.Ed.2d 790. Here, on well-pled facts, Defendants' false and defamatory statements were published in Ohio, made with the purpose to injure Dr. Carrier's professional acumen. Thus, the torts were

committed in Ohio, *Fallang v. Hickey*, 40 Ohio St. 3d 106, 107, and the long-arm statute permits the exercise of personal jurisdiction over all Defendants in Ohio.

The Ohio Supreme Court, in *Kauffman Racing Equip*., held that statements regarding an Ohio company posted by a Virginia resident on the Internet supported jurisdiction under Ohio's long-arm statute. In *Kauffman*, the defendant argued that his defamatory statements against Kauffman Racing were not made within the boundaries of Ohio. However, the Court held:

But even if Roberts did not publish or circulate his statements within the territorial boundaries of Ohio, he is not shielded from the reach of Ohio's long arm. R.C. 2307.382 (A)(6) and Civ.R. 4.3(A)(9) permit a court to exercise personal jurisdiction over a nonresident defendant and provide for service of process to effectuate that jurisdiction if the cause of action arises from a tortious act committed outside of Ohio with the purpose of injuring persons, when the nonresident defendant might reasonably have expected that some person would be injured thereby in Ohio.

Thus, even if we assume that Robert's alleged tortious conduct did not take place within the territorial boundaries of Ohio, he nonetheless "might reasonably have expected that [KRE] would be injured thereby in this state."

When defamatory statements regarding an Ohio plaintiff are made outside the state yet with the purpose of causing injury to the Ohio resident and there is a reasonable expectation that the purposefully inflicted injury will occur in Ohio, the requirements of R.C. 2307.382(A)(6) are satisfied.

Kauffman, 128 Ohio St.3d at 87.

Plaintiff concedes that Defendants made their defamatory statements outside the "territorial boundaries" of Ohio. However, the facts as pled have shown, Defendants published defamatory statements, directed at the Plaintiff and other Ohio residents, intended to inflict harm in Ohio. Defendants' statements were made with actual malice, i.e. with knowledge that they were false or with reckless disregard of whether they were false or not.

Defendants argue, at the time they published their wrongful statements, they had no reason to believe Dr. Carrier moved to Ohio. Though it strains imagination, Defendants contend

they thought Dr. Carrier still resided in California. Incidentally, none of the Defendants reside in California and so, in any event, their conduct was extra-forum. Defendants' claim is highly implausible, if not disingenuous, in light of the Plaintiff's sworn statements and exhibits that prove he openly disclosed the move to Ohio on his website and social media profile pages, in most cases months before permanently relocating his residence to Ohio on June 1, 2016. *See* Carrier Aff., pp. 5-7, at ¶ 29-35, *Exhibits I-P & BB*. In *Kauffman*, the plaintiff was an Ohio business entity. Here, Dr. Carrier is not an Ohio company, but he derives the lion's share of his livelihood from professional relationships with other Ohio-based organizations including, among many other Ohio organizations, the SSA, the SSA's hundreds of campus affiliates, Camp Quest, and its many regional affiliates. *See* Carrier Aff., pp. 4-5, at ¶ 25-26, and p. 7, at ¶ 36.

Relevant to this case however is that both the SSA and Camp Quest, with which Dr.

Carrier has had long standing public relationships over many years, are both headquartered in Ohio, a geographical fact of which all Defendants were well aware. See Carrier Aff., p. 5, at ¶¶

27-28, Exhibits D-H. Defendant Frank-Skiba specifically addresses her defamatory post about the Plaintiff, the SSA, and Camp Quest to, "Parents, younger people who may graciously volunteer for Camp Quest, a summer camp for kids:" See Complaint Dkt. No. 1, Exhibit 4.

There can be no doubt, Frank-Skiba intentionally focused her purposive conduct on Ohio. In addition to the SSA and Camp Quest, she directly addressed other Ohio residents who might volunteer for Camp Quest, or enroll their children in Camp Quest. Further, Defendant Frank-Skiba published statements concerning the "wife of the Executive Director of the Secular Student Alliance" and wrote, "This woman is the head of Camp Quest." In point of fact, the woman is Amanda Metskas, and has been an Ohio resident since 2009. See Complaint Dkt. No. 1, Exhibit

4. Defendants Lane, Skepticon, Zvan, The Orbit, Myers, and FreethoughtBlogs, subsequently

republished Frank-Skiba's statements as fact, made additional false and derivative statements, and referenced each other's statements with direct links. *See* Complaint Dkt. No. 1, *Exhibits 1-3*, and 5. Defendants well knew, or should reasonably have been expected to know, given their knowledge and extensive history with Dr. Carrier, and with the SSA, and Camp Quest, that their statements would cause injury in Ohio. To claim otherwise is hardly plausible.

Dr. Carrier attached to his Complaint numerous evidentiary documents and sworn affidavits that plainly make a *prima facie* showing of jurisdiction. Since Defendants caused tortious injury to Ohio residents, by their conduct outside of Ohio, with the purpose of inflicting injury, when Defendants knew or might reasonably have expected that some Ohio resident would be injured, Ohio's long-arm statute permits the exercise of personal jurisdiction over all Defendants.

# C. This Court's Exercise of Personal Jurisdiction Does Not Violate Defendants' Constitutional Right to Due Process

"Ohio's long-arm statute is not coterminous with due process." *Kauffma*, at 81, quoting *Goldstein* at 238, fn1. Thus, although Ohio's long-arm statute confers jurisdiction over the Defendant in this case, an Ohio court cannot exercise personal jurisdiction if jurisdiction would violate Defendants Constitutional right to due process. "The United States Supreme Court noted in *Internatl. Shoe Co. v Washington* that due process is satisfied if the defendant has 'minimum contacts' with the forum state such that the maintenance of the suit does not offend 'traditional notions of fair play and substantial justice.'" *Kauffman* at 87, quoting *International Shoe Co. v. Washington*, 326 U.S. 310, 316, 66 S.Ct. 154, 90 L.Ed. 95.

"Personal jurisdiction can be either general or specific, depending upon the nature of the contacts that the defendant has with the forum state." *Bird v. Parsons*, 289 F.3d 865, 871 (6<sup>th</sup> Cir. 2002). In the case at bar, based on the Defendants contacts with the state of Ohio, the Plaintiff

has plainly established a *prima facie* case that specific jurisdiction attaches to all Defendants. Specific jurisdiction applies when a state exercises personal jurisdiction in a suit arising out of or related to the defendant's contact with the forum state. *Helicopteros Nacionales de Colombia, S.A. v. Hall,* 466 U.S. 408, 414, 104 S.Ct. 1868, 80 L.Ed. 2d 404. Fn. 8. The Sixth Circuit has adopted a three-part test to determine whether the defendant's contacts with the forum state allow for specific jurisdiction. First, the defendant must "purposefully avail" himself of the privilege of acting in the forum state or causing a consequence in the forum state. Second, the cause of action must "arise from" the defendant's activities there. And finally, the acts of the defendant or consequences caused by the defendant must have a substantial enough connection with the forum state to make the exercise of jurisdiction over the defendant reasonable. *Southern Machine Co. v. Mohasco Indus., Inc.*, 401 F.2d 374, 381 (6<sup>th</sup> Cir. 1968). *See also, Bird v. Parsons*, 289 F.3d 865.

## 1. The Defendants Have Purposefully Availed Themselves of the Privilege of Acting in Ohio or Causing a Consequence in Ohio

"Purposeful availment is present when the defendant's contacts with the forum state 'proximately result from actions by the defendant himself that create a substantial connection with the forum state." *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 475, 105 S.Ct. 2174, 85 L.Ed.2d 528, quoting *McGee v. Internatl. Life Ins. Co.*, 355 U.S. 220, 223, 78 S.Ct. 199, 2 L.Ed.2d 223.

Here, the Plaintiff's case is a defamation claim. The United States Supreme Court addressed purposeful availment with regard to jurisdiction in causes of action in defamation in *Calder v. Jones*, 465 U.S. 783, 104 S.Ct. 1482, 79 L.Ed.2d 804. In *Calder*, a California resident and actress, Shirley Jones, brought suit against Florida-resident employees of the National Enquirer, a Florida corporation, for libel. The defendants were the writer and editor of an article

that was written in Florida and appeared in the National Enquirer. The court held that jurisdiction was proper in California because "[t]he allegedly libelous story concerned the California activities of a California resident. It impugned the professionalism of an entertainer whose television career was centered in California. The article was drawn from California sources, and the brunt of the harm, in terms of [Jones'] emotional distress and the injury to her professional reputation, was suffered in California. In sum, California is the focal point both of the story and of the harm suffered. Jurisdiction over petitioners is therefore proper in California based on the 'effects' of their Florida conduct in California." *Id.* at 788-789.

The defendants in *Calder* expressly aimed their intentional and wrongful conduct at California, and knew the brunt of the harm would be suffered in California where the plaintiff worked and lived, and in which the defendant had its largest circulation. Under the circumstances, the defendants must reasonably anticipate being haled into court there to answer for the truth of their statements. *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. at 297, 100 S.Ct. at 567, 62 L.Ed.2d 490. "An individual injured in California need not go to Florida to seek redress from persons who, though remaining in Florida, knowingly cause the injury in California." *Calder* at 789-790.

The case at bar clearly satisfies the *Calder* test to show Defendants' "purposeful availment." First, based on well-pled facts, not on mere speculation, Defendants' statements were intentional and tortious, calculated to cause injury in Ohio. Defendants' stated purpose was to end the Plaintiff's professional affiliations with the SSA and Camp Quest, and encouraged a boycott unless and until their purpose was realized. See Complaint, Dkt. No. 1, *Exhibit 4*. Second, Defendants' wrongful conduct was expressly aimed at Ohio resident Dr. Carrier, and at Ohio organizations, The SSA, and Camp Quest. Defendants knew Dr. Carrier moved to Ohio.

Information about the Plaintiff's move to Ohio was clearly disclosed, months before the defamation began, on his website and social media profile pages. *See* Complaint Dkt. No. 1, p. 2 at ¶ 4, and p. 25 at ¶ 89; Carrier Aff., p. 5, at ¶ 26, and p. 5-7, at ¶¶ 29-36. Considering Plaintiff's status as a "public figure," it is reasonably expected that public information about his current residence could be found by a cursory internet search, and would certainly be ascertainable by Defendants claiming to be journalists investigating Dr. Carrier. *See* Complaint, Dkt. No. 1, p. 10, at ¶¶ 34-35; Carrier Aff., p. 11, at ¶¶ 55-56. Further, Defendants knew that the SSA and Camp Quest were located in Ohio, and they were aware of Plaintiff's affiliations with these organizations, which the Defendants discuss in their defamatory statements. *See* Carrier Aff., pp. 4-5, at ¶¶ 25-28; p. 7, at ¶ 38; p. 10, at ¶ 51; p. 12, at ¶ 69; p.14, at ¶ 79. The Defendants in this case intended their out-of-state conduct to reach and harm Dr. Carrier's business operations in Ohio (*See* Carrier Aff., pp. 16-17, at ¶ 86-87), and it can be reasonably characterized as the Defendants' intent to inflict harm to Dr. Carrier's business affiliations with the SSA and Camp Quest. Defendants' express aim thus can be said to have reached into Ohio.

Finally, Defendants reasonably foresaw that the brunt of the injury would be felt in the forum state of Ohio. On well-pled facts, the Defendants knew Dr. Carrier relocated to Ohio (*See* Complaint Dkt. No. 1, p. 25 at ¶89; Carrier Aff., p. 5, at ¶ 26, and pp. 5-7, at ¶¶ 29-36), and knew the SSA and Camp Quest were both headquartered in Ohio. Contrary to Defendants' argument that the Plaintiff's reputation was centered in California, attached to Dr. Carrier's Complaint are Google® Trends reports, showing the Plaintiff's name recognition and following heavily weighted in Ohio. *See* Complaint, Dkt. No. 1, p. 23, at ¶¶ 78-79, *Exhibits 20 & 21*; Carrier Aff., pp. 1-4, at ¶¶ 2-24, *Exhibits A-C, and Exhibit Z, and Exhibit AA*. Defendants' defamatory statements concerned Plaintiffs' activities in Ohio, including his affiliations with the SSA and

Camp Quest. Defendants' statements also alleged, among other things, corruption as between the Plaintiff, the Executive Director of the SSA, as well as the head of Camp Quest. As discussed *supra*, Defendant Frank-Skiba's statements on June 15, 2016, aimed to sever Plaintiff's affiliation with Camp Quest and SSA, and went so far as to specifically address and discourage parents from sending their children to Camp Quest, discourage volunteers, and to urge a boycott of the SSA. See Compliant, Dkt. No. 1, p.15 at ¶ 46, Exhibit 4. As also discussed, Defendants Lane, Skepticon, Zvan, The Orbit, Myers, and FreethoughtBlogs, also directed false, defamatory statements at Ohio residents insofar as they referenced Frank-Skiba's statements as fact, allegedly on personal knowledge. See Complaint, Dkt. No. 1, Exhibits 1-3, and Exhibit 5. Given that Plaintiff resided in Ohio, which Defendants all knew, and given that the SSA and Camp Quest are headquartered in Ohio, which Defendants all knew, and given that Defendants specifically addressed and referred to Ohio residents in their defamatory articles and posts, when viewed in a light most favorable to the Plaintiff, Dr. Carrier has made a prima facie showing that satisfies the *Calder* effects test. Defendants intentionally and tortiously sought to inflict harm to his profession, and knew that the effects of their conduct would be felt in Ohio, where Dr. Carrier lives and works. Thus, Defendants purposefully availed themselves of the privilege of conducting activities within Ohio.

#### 2. Plaintiff's Cause of Action Arises Out of Defendants' Ohio-Related Activities

"If a defendant's contacts with the forum state are related to the operative facts of the controversy, then an action will be deemed to have arisen from those contacts." *Bird* at 875, quoting *CompuServe* at 1267. The Sixth Circuit held a "lenient standard \* \* \* applies when evaluating the 'arising from' criterion." *Id*. This "does not require that the cause of action formally 'arise from' defendant's contacts with the forum; rather, this criterion requires only 'that

the cause of action, of whatever type, have a substantial connection with the defendant's instate activities." (Emphasis added in *Third Natl.*) *Third Natl. Bank in Nashville v. WEDGE Group, Inc.*, 882 F.2d 1087, 1091, quoting *S. Machine Co.* at 384, fn. 27.

Dr. Carrier's claims arise not only from defamatory statements, but Defendants' statements speak specifically to affiliations between Dr. Carrier and two Ohio organizations well known to all Defendants. Defendants' contacts with Ohio include (1) statements directed at the Plaintiff, an Ohio resident, (2) statements directed at the SSA, an Ohio-based organization, and (3) statements directed at Camp Quest, an Ohio-based organization. *See* Carrier Aff., p. 5, at ¶¶ 26-28, *Exhibits D-H*. As Defendants repeatedly assert the truth defense, the merits of this case address the same question. Accordingly, and because Dr. Carrier alleged special damages suffered in Ohio (*See* Complaint, Dkt. No. 1, p. 26, at ¶¶ 91-93), caused by Defendants' conduct, the action can be said to have arisen from Defendants' Ohio-related activities.

Defendants argue "the Plaintiff cannot simply move to a new state and then choose to bring suit there against out of state defendants." Defendants' Motion to Dismiss, Dkt. No. 10, p. 13. While Dr. Carrier's action in moving to a new state is arguably at least one of several but-for causes of this lawsuit, what he seeks is relief from the Defendants' actions, and the consequences flowing directly from the Defendants' actions.

In *CompuServe*, the court held that a defendant's threat to sue constituted a contact with Ohio, and applied a proximate cause standard to determine whether the plaintiff's claim arose from that contact. The court noted that the defendant's actions threatened harm to the economic livelihood of the plaintiff, and it was that threat the plaintiff sought to eliminate through its suit. Here, on September 1, 2016, Defendants Skepticon and Lane, through counsel, sent to Plaintiff, in Ohio, notice of alleged breach of Skepticon's Harassment Policy, pursuant to the same

malicious and false accusations at issue in this case. *See* Complaint, Dkt. No. 1, p.22, at ¶ 74, *Exhibit 19*. Accordingly, Plaintiff seeks relief not merely from threats, but from actual restraints on his business resulting from Defendants' actions.

Defendants' actions are contacts with Ohio, related to the "operative facts of the controversy." Defendants actions, and the corresponding injury in Ohio, satisfy the purposeful availment requirement, form the very basis of the Plaintiff's claims, and satisfy the "arisen from" requirement established by the Sixth Circuit in *Southern Machine Co.*, 401 F.2d 374. Therefore, the Plaintiff has made a *prima facie* case that its cause of action has "arisen from" Defendants' contacts with the forum state of Ohio.

#### 3. The Exercise of Specific Jurisdiction is Reasonable

Under the third prong of the *S. Machine Co.* test, acts of the defendant or consequences caused by the defendant must have a substantial enough connection with the forum state to make the exercise of jurisdiction reasonable. "An inference arises that the third factor is satisfied if the first two requirements are met." *Bird* at 874, quoting *CompuServe* at 1268. Courts consider several factors relevant to the reasonableness inquiry, including the interest of the forum state, the burden on the defendant, the Plaintiff's interest in convenient and effectual relief, the judicial system's interest in efficient resolution of controversies, and the shared interest of the several states in furthering fundamental social policies. *Id*.

"A court first must consider Ohio's interest in the controversy." *Kauffman* at 93, quoting *In-Flight Servs. Corp. v. Van Dusen Air, Inc.*, 466 F.2d 220, 232 (C.A.6, 1972). "Ohio has a legitimate interest in protecting the business interests of its citizens...." *Bird* at 875. Here, Ohio plainly has an interest in protecting Plaintiff's business interests, especially since much of those business interests involve other Ohio organizations (the SSA and Camp Quest). "The United

States Supreme Court has indicated that a high degree of unfairness is required to erect a constitutional barrier against jurisdiction," especially in a case in which the defendant has intentionally directed his activity at forum residents and the effects of the activity occur in the forum state. *Kauffman* at 94, citing *Calder* at 788-798. Nowhere in Defendants' Motion to Dismiss do they assert a degree of unfairness in litigating the case in Ohio -- certainly not any degree of unfairness sufficient to overcome Ohio's interest in protecting the business interests of its residents and organizations.

As to the Defendants' burden, the Defendants all claim (vigorously) they thought Dr. Carrier was a resident of California at the time they published their tortious statements. Not one of the Defendants reside in California. By implication, Defendants indicate their willingness to litigate in a state other than their own. Defendants have not argued that their defense would be prejudiced in Ohio, nor burdened in any other way. The Plaintiff's burden, however, in litigating this suit in one or more other states might be so burdensome as to practically relinquish the claim. Ohio is the best forum to litigate the Plaintiff's claims, and to serve the judicial system's interest in obtaining efficient resolution of controversies. Considering the states' shared interest in fundamental social policies, Defendants' intentional and malicious conduct went well beyond threats. Defendants purposefully caused the cancellation of Dr. Carrier's business expectancies, and threatens the future of his career, as his professional acumen has been smeared.

Viewing the evidence in a light most favorable to the Plaintiff, Ohio's long-arm statute confers jurisdiction over all Defendants, and an exercise of jurisdiction by this Court will not deprive the nonresident Defendants of their right to due process of law under the Fourteenth Amendment to the United States Constitution. The Plaintiff has made a sufficient showing that all Defendants caused tortious injury in Ohio by acts committed outside of Ohio, with the

intended purpose of injuring Dr. Carrier. Defendants' false and defamatory statements specifically targeted a known Ohio resident, and the causes of action arise from the substantial connection with the defendant's instate activities. Defendants repeatedly assert the truth defense. The merits of this case address that very issue, and seek to remedy the harm. This honorable Court must not allow out-of-state defendants to exploit internet technology and at the same time avoid accountability for their intentional and wrongful conduct.

#### D. Venue is Proper Under 28 U.S.C. § 1391(b)(2)

28 U.S.C. § 1391(b)(2) provides in pertinent part:

- (b) Venue in general.—A civil action may be brought in—
  - (2) a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of property that is the subject of the action is situated;

This Court enjoys venue under 28 U.S.C. § 1391(b)(2) because all or a substantial portion of the events that gave rise to Dr. Carrier's claims accrued within the state of Ohio, including Defendants' specific targeting of the Plaintiff's business affiliates in Ohio, Defendants' publication and republication of defamatory falsehoods in the district, the damage to Plaintiff's reputation suffered in the district, and Defendants' tortious interference with Plaintiff's business expectancies in the district. On well-pled facts, moreover, the Defendants colluded and collaborated to defame Dr. Carrier. *See* Carrier Aff., p. 8, at ¶ 43, *Exhibits Q-S*, and p. 9, at ¶¶ 47-48, *Exhibits T-U*. Courts recognize that a plaintiff is not required to choose the "best" venue. The question for the court is whether the Plaintiff chose any forum with a substantial connection to the claim, regardless of whether other forums exist with greater connections. *First of Michigan Corp. v. Bramlet*, 141 F.3d 260, 263 (6<sup>th</sup> Cir. 1998).

The Court must look at the entire progression of the underlying claim rather than focus solely on the matters that gave rise to the filing of the action, including where the relevant wrongful action occurred and where the alleged harm occurred. *See First of Michigan Corp.* at 264 (finding that district court erred when it determined that venue was improper based on a single occurrence that directly gave rise to the plaintiff's action rather than considering whether the forum plaintiffs chose had a substantial connection their claims). As discussed *supra*, Ohio has a substantial connection to each of Plaintiff's claims, against each of the Defendants, since Defendants directed their actions at residents and organizations in Ohio, and Defendants' conduct as alleged in Plaintiff's Complaint caused substantial injury within this judicial district.

#### IV. CONCLUSION

For the foregoing reasons, the Court should deny Defendants' Motion to Dismiss for lack of personal jurisdiction, on the grounds that the Plaintiff made a *prima facie* showing of facts sufficient to justify specific jurisdiction over all Defendants in this matter. Further, the Court should deny Defendants' motion based on improper venue as the Plaintiff has shown this judicial district has a substantial connection to the Plaintiff's claims and injury.

Respectfully Submitted,

/s/ Jeffrey T. Perry
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Counsel for Plaintiff
Dr. Richard Carrier, Ph.D.

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 22'nd day of December, 2016, a copy of the foregoing was filed using the CM/ECF that will send a notice of electronic filing to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail, postage prepaid.

By: <u>/s/ Jeffrey T. Perry</u>

Jeffrey T. Perry

Supreme Court No.: 0088989

Counsel for Plaintiff
Dr. Richard Carrier, Ph.D.

### **EXHIBIT 1**

Affidavit of Dr. Richard Carrier in Support of Plaintiff's Brief in Opposition Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue

#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO **EASTERN DIVISION**

DR. RICHARD CARRIER

Plaintiff,

Case No. 22:16-cv-00906-MHW-EPD -VS-

JUDGE Michael H. Watson

FREETHOUGHTBLOGS NETWORK, PAUL Z. MYERS, PH.D., THE ORBIT, STEPHANIE ZVAN, SKEPTICON, INC.,

LAUREN LANE, and AMY FRANK-SKIBA

Defendants

#### AFFIDAVIT OF DR. RICHARD CARRIER IN SUPPORT OF PLAINTIFF'S BRIEF IN OPPOSITION DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE

Dr. Richard Carrier being first duly sworn, deposes and states on personal knowledge as follows:

- 1. Affiant states, I am over the age of eighteen (18) years, I have never been convicted of a crime involving fraud or dishonest, and I am competent to testify as to all matters set forth herein.
- 2. Affiant states, at all times relevant to this sworn statement, I accessed the Internet while physically located at my home in Columbus, Ohio.
- 3. Affiant states, at no time ever have I utilized, nor caused to be utilized, any service or technique to manipulate Internet search engine results. All of the Exhibits attached to my Complaint were generated as so indicated, by entering only basic and conventional search parameters.

- Affiant states, on December 8, 2016, I accessed the URL,
   https://support.google.com/trends/answer/4355213?hl=en&ref\_topic=6248052.
- 5. Affiant states, Google<sup>®</sup> Trends data exhibits slight variances, each time a repot is generated, due to random sampling. Search terms with low volume are excluded, as are repeated searches for the same person over a short period of time.
- 6. Affiant states, a true and correct copy of the webpage as I observed it on December 8, 2016 is attached hereto marked **Affidavit Exhibit A**. Affiant further states, on December 8, I generated a Google® Trends report for the same time span as Exhibit 20 to my Complaint. Affiant further states, the report shows slightly different but substantially the same results, for the otherwise identical report, as results differ slightly each time a report is generated. Affiant further states, a true and correct copy of the webpage as I observed it on December 8, 2016 is attached hereto marked **Affidavit Exhibit AA**.

#### Plaintiff's Exhibit 20

- 7. Affiant states, on August 12, 2016, I ran a Google® Trends report using the search term "Richard Carrier" for the preceding thirty days (July 12 through August 12, 2016).
- 8. Affiant states, Defendants' defamatory statements, as alleged in my Complaint, occurred, in pertinent part, between June 15 and July 30, 2016. Observing the effects of Defendants' defamation over a thirty-day period from July 12 to August 12, 2016 is therefore reasonable.
- 9. Affiant states, the effects of Defendants' defamation were pronounced, and show disproportionate harm occurred in Ohio during the reporting period.

- 10. A true and correct copy of the webpage as I observed it on August 12, 2016 is attached to Plaintiff's Complaint marked **Exhibit 20**.
- 11. Affiant states, on December 8, 2016, I duplicated the above steps to run another Google® Trends report using the search term "Richard Carrier" for the preceding thirty-days (November 8 through December 8, 2016).
- 12. Affiant states, a true and correct image of the webpage as I observed it on December 8, 2016 is attached hereto marked **Affidavit Exhibit B**.
- 13. Affiant states, as Exhibit B pertains to December 8, 2016, the report differs from the month proximate to the defamation.
- 14. Affiant states, notably, the results of Exhibit B show a greater impact from Ohio than California, and shows search volume from Ohio as among the top three states (for the period November 8 through December 8, 2016).
- 15. Affiant states, on December 9, 2016, I ran a Google<sup>®</sup> Trends report using the search term "Richard Carrier" for the period January 1 through December 31, 2015.
- 16. Affiant states, as the Google<sup>®</sup> Trends report shows, long before relocating my residence to Ohio, my professional prominence was greater in Ohio than California.
- 17. Affiant states, a true and correct image of the webpage as I observed it on December 9, 2016 is attached hereto marked **Affidavit Exhibit C**.

#### Plaintiff's Exhibit 21

- 18. Affiant states, on August 15, 2016, I ran a Google® Trends report using the search term "Skepticon" for the preceding ninety days.
- 19. Affiant states, the report indicates a disproportionate number of Ohioans were exposed to Skepticon's defamatory statements concerning me, more than any other

- state except Missouri, which is where Skepticon, Inc. is headquartered.
- 20. Affiant states, Defendants Skepticon and Lane published defamatory statements about me, as alleged in my Complaint, in pertinent part, on June 20, 2016.
- 21. Affiant states, the Google® Trends report shows a more sustained interest in Skepticon beginning on or about June 20, 2016.
- 22. Affiant states, the effects of Defendants' defamation were pronounced, and show disproportionate harm occurred in Ohio during the reporting period.
- 23. A true and correct copy of the webpage as I observed it on August 15, 2016 is attached to Plaintiff's Complaint marked **Exhibit 21**.
- 24. Affiant states, on December 8, 2016, I performed a general Google® search using the term "richard carrier." Affiant further states, the top seven (7) hits included two of the defamatory statements (matching Complaint Exhs. 2 & 5), as well as another prominent article concerning the defamatory statements. Affiant further states, a true and correct copy of the webpage as I observed it on December 8, 2016 is attached hereto marked **Affidavit Exhibit Z**.
- 25. Affiant states, as alleged in my Complaint, since 2005, I have had professional relationships and valid ongoing business expectancies with Ohio organizations that include the Secular Student Alliance ("SSA"), and the SSA's hundreds of campus affiliates, and Camp Quest and its many regional affiliates, and other community and campus organizations, which have been my principal source of speaking and direct sales income. Affiant further states, I have had professional relationships and valid ongoing business expectancies with other Ohio organizations that include PolyColumbus, The Columbus Space for Alternative Self Expression, Columbus

Rationality, the Humanist Community of Central Ohio, the University of Cincinnati SSA affiliate, the Secular Students of Miami, the University of Akron affiliate of the SSA, the Case CFI club at Case Western Reserve University, and CFI North East Ohio. Affiant further states, as alleged in my Complaint, since 2005, I have also had professional relationships and valid ongoing business expectancies with various reputable publishing houses and co-authors. Affiant further states, based on the past success of these engagements, and based on my residence in Ohio, I intended to develop further business relationships with these organizations, and with the numerous, similar organizations throughout the State.

- 26. Affiant states, at all times relevant herein, on information and belief, all Defendants knew of my business affiliations in Ohio, and of my permanent relocation to Ohio.
- 27. Affiant states, at all times relevant herein, all Defendants were well aware that the SSA is headquartered in Columbus Ohio, and were well aware of my business affiliations therewith. Affiant further states, in addition to Defendants' personal knowledge, both the public Wikipedia page for the SSA and SSA's own website indicate their location in Columbus, OH. **Affidavit Exhibits D & E**.
- 28. Affiant states, at all times relevant herein, all Defendants were well aware that Camp Quest is headquartered in Columbus Ohio, and were well aware of my business affiliations therewith. Affiant further states, in addition to Defendants' personal knowledge, Camp Quest's Wikipedia page indicates their headquarters in Columbus, Ohio, as does Camp Quest's website contact page and footer. **Affidavit Exhibits F-H**.
- 29. Affiant states, on April 16, 2016, an announcement was published on freethoughtblogs.com concerning my permanent relocation to Ohio. Defendants FtB

- and Myers were aware of the post, and officially its publishers. It showed the image of a moving truck and included my statement, "I am moving to Columbus, Ohio, for good and all this May (2016)." Affidavit Exhibit I.
- 30. Affiant states, on May 24, 2016, another announcement was published on freethoughtblogs.com concerning my permanent relocation to Ohio. Defendants FtB and Myers were aware of the post, and officially its publishers. In it I stated, "I am moving to Columbus, Ohio, for good and all. And I'm taking a moving truck and towing my car all the way across country from my current and soon past home in Stockton, California." Affidavit Exhibit J.
- 31. Affiant states, on or before May 4, 2016, another announcement was published on Meetup.com concerning my permanent relocation to Ohio, wherein a talk hosted at the University of Nebraska at Omaha was announced as, "*A whistle-stop on his move across country to Ohio*." **Affidavit Exhibit K**. Affiant further states, the Meetup.com announcement was linked to my blog on May-04 wherein I stated, "That's my fourth stop on the move across country." **Affidavit Exhibit L**. Affiant further states, my May-04 blog post was subsequently announced on Facebook® and Twitter®.

### Affidavit Exhibit M.

- 32. Affiant states, well in advance of my move to Ohio, my intent to relocate to Ohio was prominently disclosed on my blog at FtB, and on my website, social media pages, and by word of mouth.
- 33. Affiant states, since at least April 16, 2016, my Facebook® page has indicated, "Lives in Columbus, Ohio" Affidavit Exhibit N.

- 34. Affiant states, since April, my Twitter® and Facebook® pages has indicated that I live in "Columbus, OH" Affidavit Exhibits O & BB.
- 35. Affiant states, since April the booking page on my website has read, "I live in Columbus, Ohio." **Affidavit Exhibit P**.
- 36. Affiant states, on or about June 1, 2016, I completed my permanent relocation to Columbus Ohio.
- 37. Affiant states, as alleged in my Complaint, Freethought Blogs Network ("FtB") was founded by, and is operated by, as its CEO, Defendant Paul Z. Myers, Ph.D. ("Myers") Complaint, Dkt. No. 1, p. 3, at ¶ 5.
- 38. Affiant states, at all times relevant herein, Defendants FtB and Myers knew of my business affiliations in Ohio, and of my permanent relocation to Ohio. Affiant further states, at all times relevant herein, Defendants FtB and Myers were well aware that the SSA and Camp Quest are both headquartered in Columbus Ohio, and were aware of my business affiliations therewith.
- 39. Affiant states, as alleged in my Complaint, on June 21, 2016, Defendants FtB and Myers published a false and defamatory statement concerning me. Complaint, Dkt. No. 1, Exhibit 1. Affiant further states, Defendants' statements were derivative of false and defamatory statements published on June 15, 2016 by Defendant Amy Frank-Skiba ("Frank-Skiba"), and Defendants claimed personal knowledge thereof. Complaint, Dkt. No. 1, Exhibit 4.
- 40. Affiant states, as alleged in my Complaint, Defendants FtB's and Myers' accusations are categorically false, as multiple witnesses and e-mail correspondence will corroborate.

- 41. Affiant states, as alleged in my Complaint, on June 21, I spoke by phone with Defendants FtB and Myers. Affiant further states, our discussion included, among other topics, the fact that I'd permanently relocated to Ohio, and that I would have to sue him if he did not retract. Complaint, Dkt. No. 1, Exhibit 25, pp. 13 & 14, at ¶ 77.
- 42. Affiant states, Defendant Myers worked with the SSA in Columbus, Ohio, and spoke at their National convention in Columbus at least twice, in 2009 and 2011. Affiant further states, on at least one occasion, Defendant Myers was the SSA's keynote speaker in Columbus, Ohio.
- 43. Affiant states, on June 24 and June 25, Defendants FtB, Myers, Zvan, and The Orbit published additional false and defamatory statements concerning me, and reaffirming all previous false and defamatory statements. **Affidavit Exhibits Q-S**. Affiant further states, demonstrative of collusion and collaboration among the Defendants, FtB and Myers further stated, "I was the contact person who got the personal accounts and relayed them to the Ethics Committee [referring to FtB] . . . " and stated, "I'm also in contact with the people at the-orbit [sic] and skepticon [sic] who've been dealing with this. I've had a short phone conversation with Carrier . . . " **Affidavit Exhibit Q**. Affiant further states, additional evidence of collusion and collaboration among the Defendants can be inferred by Defendants Zvan's and The Orbit's statements on June 24. **Affidavit Exhibit R**.
- 44. Affiant states, as alleged in my Complaint, again on June 26, Defendants FtB and Myers published additional false and defamatory statements concerning me.Complaint, Dkt. No. 1, Exhibit 5.

- 45. Affiant states, on July 26, 2016, through counsel, I sent a cease and desist letter to Defendants FtB and Myers, demanding a retraction. Complaint, Dkt. No. 1, Exhibit
  6. Affiant further states, my counsel of record is located in Dublin Ohio, as prominently indicated on the firm's stationary and website.
- 46. Affiant states, neither Defendant FtB nor Myers has retracted their false and defamatory statements. Affiant further states, on the contrary, Defendants FtB and Myers subsequently reaffirmed their false statements.
- 47. Affiant states, on September 24, 2016, Defendants FtB and Myers published a statement on freethoughtblogs.com wherein Myers wrote, "*Richard Carrier is suing 7 entities, and I'm two of them.*" "*So there's another fate I won't be surrendering to.*"

  Affidavit Exhibit T. Affiant further states, Defendants FtB and Myers stated, referring to Defendants The Orbit and Skepticon, "... we're probably going to have to coordinate something." Affidavit Exhibit T, Comment 9.
- 48. Affiant states, on December 2, 2016, Defendants FtB and Myers published a statement on freethoughtblogs.com wherein Myers wrote, "You may know that Freethoughtblogs, The Orbit, and Skepticon have taken on a lawyer to defend us against a lawsuit for over two million dollars by Richard Carrier. Weirdly, this suit was filed in Ohio, where none of the targets live, and where most of the conflicts did not occur . . . " Affidavit Exhibit U. Affiant further states, Defendants FtB and Myers stated, referring to all Defendants, "We are all of us committed to hang together, though, so even if we were split apart, we'd still be mutually supporting each other in this ludicrous suit." Affidavit Exhibit U, Comment 41.

- 49. Affiant states, as alleged in my Complaint, Defendant Stephanie Zvan ("Zvan") is a member of Defendant The Orbit ("The Orbit"), and is the author of false and defamatory statements published on June 20 and July 30, 2016. Complaint, Dkt. No. 1, p. 5, at ¶ 10, Exhibits 2 & 17. Affiant Further states, Defendants' statements were derivative of false and defamatory statements published on June 15, 2016 by Defendant Frank-Skiba, and Defendants claimed personal knowledge thereof.
  Complaint, Dkt. No. 1, Exhibit 4.
- 50. Affiant states, as alleged in my Complaint, Defendants Zvan's and The Orbit's accusations are categorically false, as multiple witnesses and e-mail correspondence will corroborate.
- 51. Affiant states, at all times relevant herein, Defendants Zvan and The Orbit knew of my business affiliations in Ohio, and of my permanent relocation to Ohio. Affiant further states, at all times relevant herein, Defendants Zvan and The Orbit were well aware that the SSA and Camp Quest are both headquartered in Columbus Ohio, and were aware of my business affiliations therewith.
- 52. Affiant states, on July 26, 2016, through counsel, I sent a cease and desist letter to Defendants Zvan and The Orbit, demanding a retraction. **Complaint, Dkt. No. 1, Exhibit 7**. Affiant further states, my counsel of record is located in Dublin Ohio, as prominently indicated on the firm's stationary and website.
- 53. Affiant states, neither Defendant Zvan nor The Orbit has retracted their false and defamatory statements. Affiant further states, on the contrary, Defendants Zvan and The Orbit subsequently reaffirmed their false statements.

- 54. Affiant states, on July 30, 2016, Defendants Zvan and The Orbit reasserted their false and defamatory statements. **Complaint, Dkt. No. 1, Exhibit 17**. Affiant further states, as alleged in my Complaint, Defendants curiously alleged a "sixth" accuser. **Complaint, Dkt. No. 1, p. 19, at ¶ 66**.
- 55. Affiant states, according to her Wikipedia entry, Defendant Zvan is described as a "newspaper writer." Complaint, Dkt. No. 1, p. 4, at ¶ 9. Affiant further states, according to The Orbit, the organization aims to "...rival the best media sites." Complaint, Dkt. No. 1, p. 4, at ¶ 8.
- 56. Affiant states, even if Defendants were not aware of my permanent relocation to Ohio, a cursory Internet search, consistent with the most basic of journalistic integrity, would have confirmed my residence in Ohio, as all my social media profiles, and my website have so indicated since April 2016.
- 57. Affiant states, among The Orbit's co-owners is Ms. Greta Christina.
- 58. Affiant states, Ms. Christina had personal knowledge that I was leaving California and relocating my residence to Ohio.
- 59. Affiant states, on May 21, 2016, a 'farewell' party was hosted by two mutual friends of Ms. Christina's and mine. Affiant further states, prior to the May 21 party, electronic invitations were sent with the message, "We are having a potluck for Rick, who is going to be moving to Columbus, Ohio at the end of May."
- 60. Affiant states, the invite list included Ms. Christina.
- 61. Affiant states, a true and correct copy of the electronic invitation is attached hereto marked **Affidavit Exhibit V**. Affiant further states, on May 22, a post to my Facebook<sup>®</sup> wall, including seventeen (17) photos, read, "*David and Dana host a*"

- farewell party (and a reunion of old friends) for Dr. Richard Carrier, who leaves for Ohio at the end of the month." **Affidavit Exhibit CC**.
- 62. Affiant states, Ms. Christina was the recipient, on behalf of The Orbit, of my July 26, cease and desist letter. **Complaint, Dkt. No. 1, Exhibit 7**. Affiant further states, the U.S. Postal return receipt, dated August 5, 2016 bares Ms. Christina's signature. **Complaint, Dkt. No. 1, Exhibit 11**.
- 63. Affiant states, among The Orbit's co-owners is Ms. Miri Mogilevsky. Affiant further states, Ms. Mogilevsky is on the Board of Directors of the SSA.
- 64. Affiant states, Ms. Mogilevsky had personal knowledge that I was leaving California and relocating my residence to Ohio.
- 65. Affiant states, Ms. Mogilevsky herself physically resides in the State of Ohio.
- 66. Affiant states, on April 8 and April 9, 2016, I had an exchange with Ms. Mogilevsky by Facebook<sup>®</sup> Messenger in which we discussed my relocation to Ohio. Affiant further states, Ms. Mogilevsky asked where I'd be living specifically, and I answered *'Clintonville*,' to which Ms. Mogilevsky replied, '*That's great. I love Clintonville*.'
- 67. Affiant states, true and correct copies of the Facebook® Messenger exchange are attached hereto marked **Affidavit Exhibits W & X**.
- 68. Affiant states, as alleged in my Complaint, Skepticon, Inc. ("Skepticon") was cofounded by Defendant Lauren Lane ("Lane"), where she currently serves as president.

  Complaint, Dkt. No. 1, p. 5, at ¶¶ 11 & 12.
- 69. Affiant states, at all times relevant herein, on information and belief, Defendants

  Skepticon and Lane knew of my business affiliations in Ohio, and of my permanent relocation to Ohio. Affiant further states, at all times relevant herein, Defendants

- Skepticon and Lane were well aware that the SSA and Camp Quest are both headquartered in Columbus Ohio, and were aware of my business affiliations therewith.
- 70. Affiant states, as alleged in my Complaint, on June 20, 2016, Defendants Skepticon and Lane published a false and defamatory statement concerning me. **Complaint, Dkt. No. 1, Exhibit 3**. Affiant further states, Defendants' statements were derivative of false and defamatory statements published on June 15, 2016 by Defendant Amy Frank-Skiba ("Frank-Skiba"), and Defendants claimed personal knowledge thereof. **Complaint, Dkt. No. 1, Exhibit 4**.
- 71. Affiant states, as alleged in my Complaint, Defendants Skepticon's and Lane's accusations are categorically false, as multiple witnesses and e-mail correspondence will corroborate.
- 72. Affiant states, on July 26, 2016, through counsel, I sent a cease and desist letter to Defendants Skepticon and Lane, demanding a retraction. **Complaint, Dkt. No. 1, Exhibit 8**. Affiant further states, my counsel of record is located in Dublin Ohio, as prominently indicated on the firm's stationary and website.
- 73. Affiant states, neither Defendant Skepticon nor Lane has retracted their false and defamatory statements. Affiant further states, on the contrary, Defendants Skepticon and Lane subsequently reaffirmed their false statements.
- 74. On September 1, 2016, through counsel, Defendants Skepticon and Lane replied to my cease and desist letter, wherein Defendants reasserted their false accusations and wrote, "To the extent the Post accuses Dr. Carrier of sexual harassment . . . this is true, and will be proven in court, if necessary." Complaint, Dkt. No. 1, Exhibit 19.

75. Affiant states, as alleged in my Complaint, Defendant Amy Frank-Skiba ("Frank-Skiba") is the former president of the Arizona State University chapter of the SSA, and is the author of false and defamatory statements published on June 15, 2016, in which Defendant Frank-Skiba claimed personal knowledge of very serious charges that included sexual assault, sexual harassment, sexual abuse, and corruption.

# Complaint, Dkt. No. 1, pp. 5 & 6, at ¶¶ 14 & 15, Exhibit 4.

- 76. Affiant states, as alleged in my Complaint, Defendant Frank-Skiba's statements were addressed to, in part, "Parents, and younger people who may graciously volunteer for Camp Quest, a summer camp for kids:" implying my affiliation with Camp Quest would pose a danger to children. Complaint, Dkt. No. 1, pp. 5 & 6, at ¶¶ 14 & 15, Exhibit 4.
- 77. Affiant states, as alleged in my Complaint, Defendant Frank-Skiba's statements included the assertion about me that she was "not even close to being his only victim," implying personal knowledge that I had perpetrated similar acts on other women.
- 78. Affiant states, as alleged in my Complaint, Defendant Frank-Skiba's accusations are categorically false, as multiple witnesses will corroborate.
- 79. Affiant states, at all times relevant herein, Defendant Frank-Skiba knew of my business affiliations in Ohio, and of my permanent relocation to Ohio. Affiant further states, at all times relevant herein, Defendant Frank-Skiba was well aware that the SSA and Camp Quest are both headquartered in Columbus Ohio, and was aware of my business affiliations therewith.
- 80. Affiant states, on June 7, 2016, approximately one (1) week prior to publishing her defamatory statements, Defendant Frank-Skiba contacted an affiliate organization in

Florida, under false pretenses, fishing for information as to my involvement with the SSA. Affidavit Exhibit Y. Affiant further states, the impetus for Defendant Frank-Skiba's investigation could only have been based on my online announcements months earlier. Affiant further states, thus, Defendant Frank-Skiba must have seen the myriad announcements concerning my relocation from California to Ohio.

Affidavit Exhibits K, M, N, BB, & CC. Affiant further states, demonstrative of the fact that Defendant Frank-Skiba was monitoring my Facebook® wall, is the screen shot she attached to her June 15 defamatory statement, of a Facebook® event erroneously announcing that I started working at Camp Quest West. Affidavit Exhibit DD.

- 81. Affiant states, on July 6, 2016, through counsel, I sent a cease and desist letter to Defendant Frank-Skiba, demanding a retraction. **Complaint, Dkt. No. 1, Exhibit 9**. Affiant further states, my counsel of record is located in Dublin Ohio, as prominently indicated on the firm's stationary and website.
- 82. Affiant states, Defendant Frank-Skiba has refused to retract her false and defamatory statements. Affiant further states, on the contrary, and as alleged in my Complaint, Defendant Frank-Skiba subsequently reaffirmed her false statements, and published additional and contradictory false and defamatory statements. Complaint, Dkt. No. 1, pp. 20 & 22, at ¶¶ 70 & 72.
- 83. Affiant states, subsequent to receiving my cease and desist letter, Defendant Frank-Skiba started a gofundme<sup>®</sup> campaign to solicit legal defense funds. Affiant further states, on her gofundme<sup>®</sup> page, Defendant Frank-Skiba published a verbatim copy of my cease and desist letter, and further reasserted false and defamatory accusations

concerning sexual harassment. Complaint, Dkt. No. 1, Exhibit 18.

- 84. Affiant states, at no time has any Defendant, nor any agent acting on Defendants' behalf requested my alibi(s), witness(es), nor evidence concerning any of the conduct Defendants falsely allege. Affiant further states, owing to Defendants' false and defamatory statements, I am now deprived of my reputation in good standing with the SSA. Affiant further states, until June of 2016, I had SSA approval to speak at SSA affiliate events and conferences, and to sell my books as a vendor at SSA events and conferences. This continued approval, however, is effectively suspended pending the outcome of this case.
- 85. Affiant states, I expected to work as an endorser to promote the SSA brand, and as a future volunteer for the SSA. Affiant further states, in light of the ongoing and unretracted defamation, these expectancies are no longer.
- 86. Affiant states, owing to Defendants' false and defamatory statements, I am now unable to pursue several promotional and business projects with Camp Quest that I was developing, and others I had hoped to develop in the future. Affiant further states, projects in development include: an educational game to be sold to or promoted with Camp Quest and their affiliates, and marketed to parents, educators, and educational institutions; and a science experiment involving testing the accuracy of ancient astronomical instruments that was expected to generate considerable publicity, and publication in a peer reviewed academic journal that was expected to advance my reputation as a historian of science. These and other projects were expected for many years.

87. Affiant states, as alleged in my Complaint, on or about June 21, 2016, Defendant FtB blocked me from access to my blog, from publishing content, and blocked the public's access to all my previous publications at FtB, severely disrupting search engine visibility to market my body of work. Complaint, Dkt. No. 1, p. 17, at ¶¶ 53-55

FURTHER AFFIANT SAYETH NAUGHT.

DR. BICHARD CARRIER

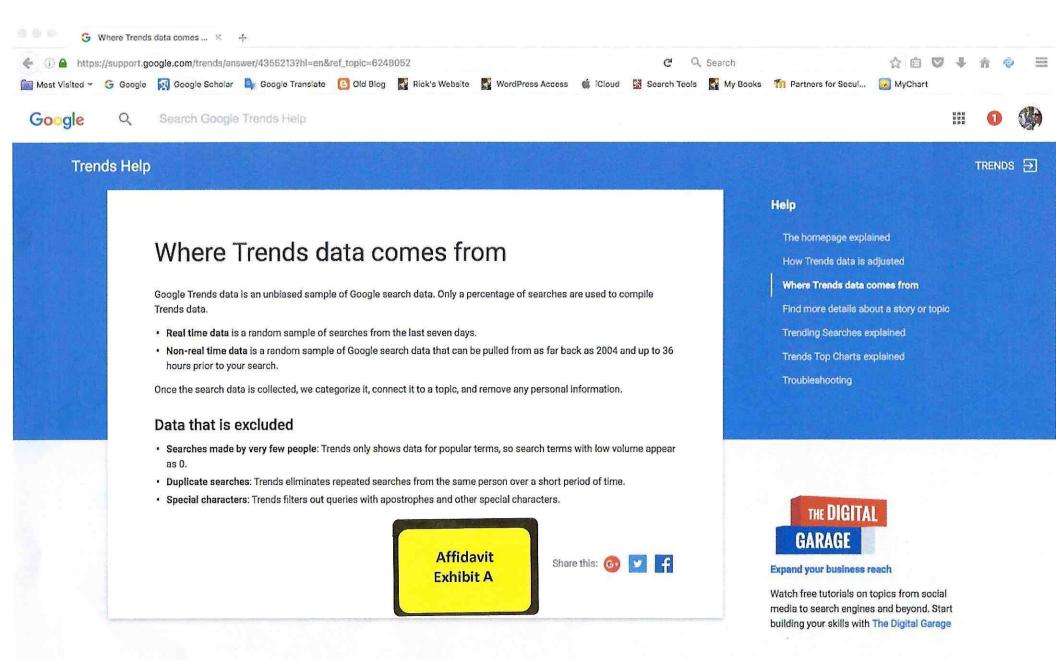
SWORN TO BEFORE ME and subscribed in my presence this <u>21'st</u> day of <u>December</u>, 2016.

NOTARY PUBLIC

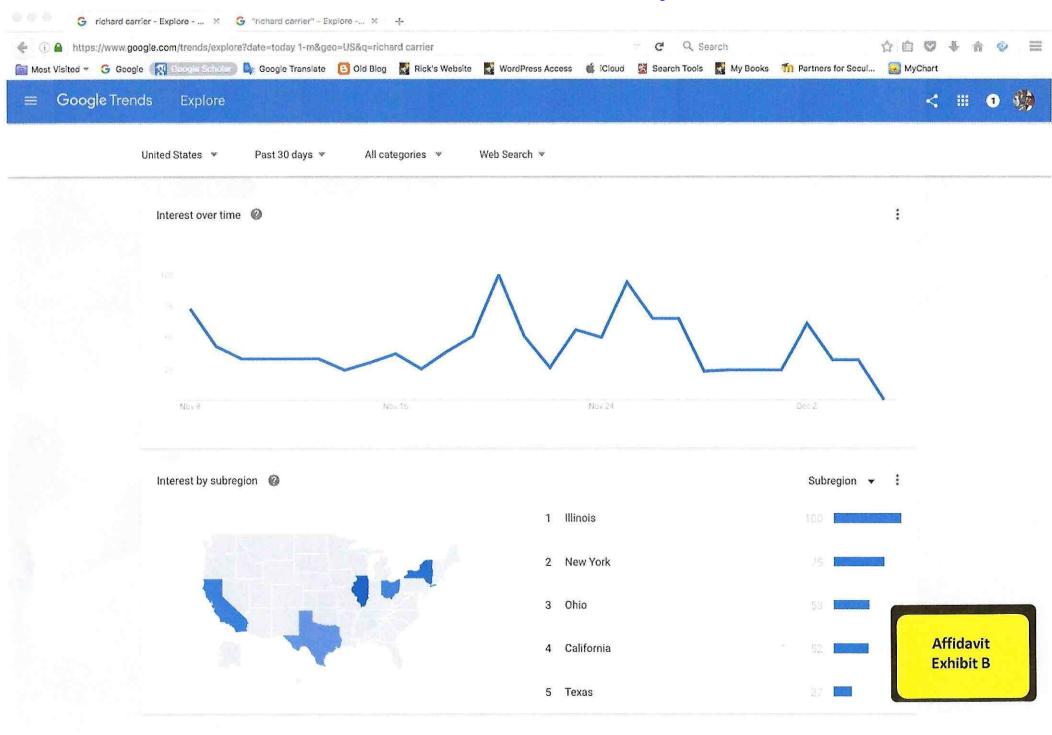
My commission expires: My Commission Has No Expiration



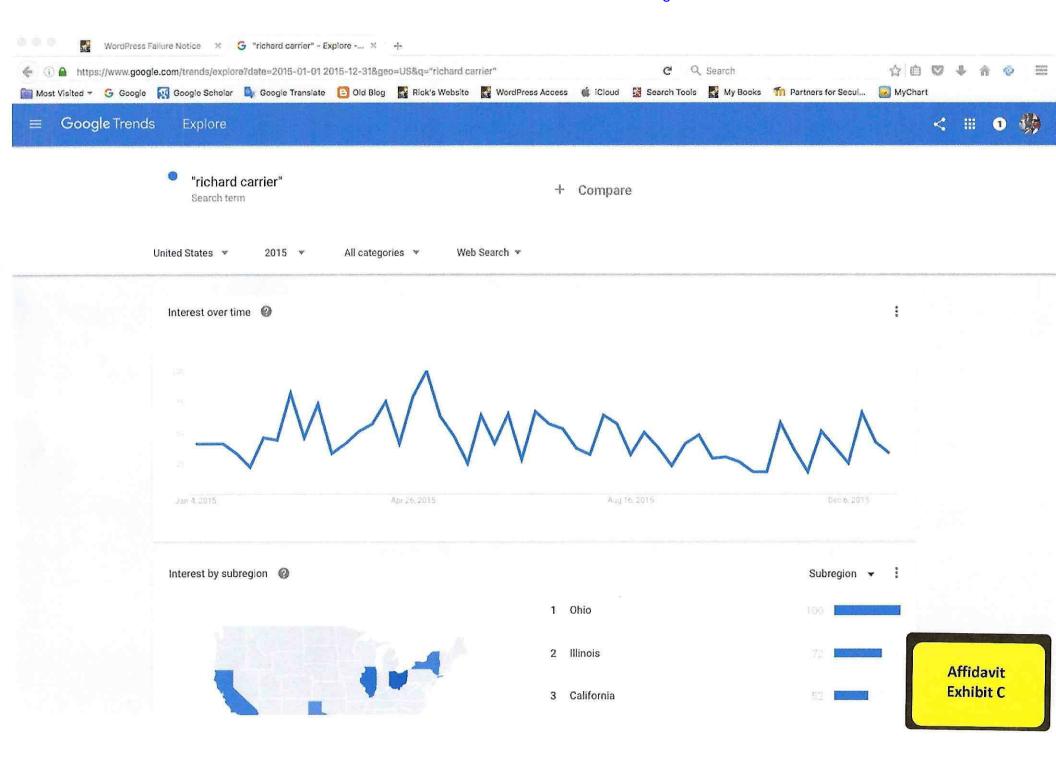
JEFFREY T. PERRY
Attorney At Law
NOTARY PUBLIC
STATE OF OHIO
My Commission Has
No Expiration Date
Section 147.03 O.R.C.



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Case: 2:16-cv-00906-MHW-EPD Doc #: 17-4 Filed: 12/22/16 Page: 1 of 1 PAGEID #: 384



# Secular Student Alliance

From Wikipedia, the free encyclopedia

The Secular Student Alliance (SSA) is an educational nonprofit organization whose purpose is to educate high school and college students about the value of scientific reason and the intellectual basis of secularism in its atheistic and humanistic manifestations. The SSA also offers these students and their organizations a variety of resources, including leadership training and support, guest speakers, discounted literature and conference tickets, and online articles and opinions.

# **Contents**

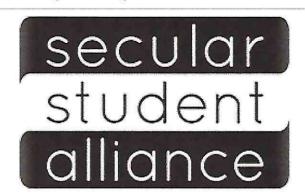
- 1 History
- 2 Membership growth
- 3 Events
- 4 Conferences
- 5 See also
- 6 References
- 7 Further reading
- 8 External links

# History

In 1999, the students on the Executive Council of the Campus Freethought Alliance, along with some other students, faculty advisors, and off-campus supporters, decided that a national student organization needed autonomy (the Campus Freethought Alliance was governed by the Council for Secular Humanism). [2] Therefore, in April 2000, a majority of the members of the Campus Freethought Alliance Executive Council decided to become independent from the Council for Secular Humanism. [2] The Secular Student Alliance was thus founded in May 2000 by eight student leaders from the grassroots secular movement. [2] It was organized under the nonprofit corporation laws [3] of the State of Ohio on November 21, 2001. [4] The corporation's principal office is located in Columbus, Ohio. [5]

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Exhibit D

Secular Student Alliance



**Abbreviation** SSA

**Motto** Empowering Students for a

Secular Future

Formation November 21, 2001

Type non-profit

Legal status corporation (http://www2.sos.state.

oh.us/pls/bsqry/f?p=100:7:602190 836324672::NO:7:P7\_CHARTER

\_NUM:1272988)

**Purpose** scientific rationality, secularism,

and human-based ethics (http://sec ularstudents.org/sites/default/files/ SSA\_regulations\_2013\_1\_24.pdf)

Headquarters Columbus, Ohio

Region served

United States

Official language

English

Key people August E. Brunsman IV, Executive

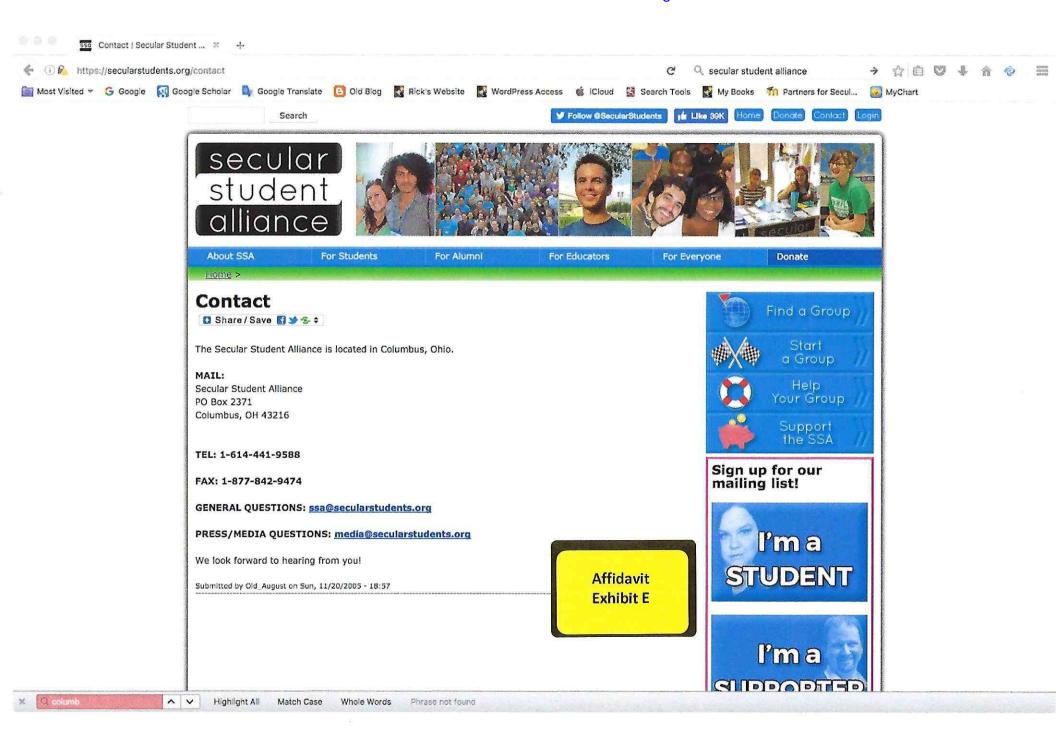
Director

Alex DiBranco, Chair of the Board

of Directors

**Staff** 12[1]

Website http://www.secularstudents.org/



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From Wikipedia, the free encyclopedia

Camp Quest, founded in 1996, is the first residential summer camp in the United States, Canada, the United Kingdom, Ireland, and Norway specifically for the children of nontheistic or freethinking parents (including atheists, agnostics, secular humanists, skeptics, rationalists, and others who hold a naturalistic worldview). [1][2] Amanda Metskas is Camp Quest's Executive Director. [3]

# **Contents**

- 1 Purpose and identity
- 2 Programs and activities
- 3 History
- 4 Murrow Indian Children's Home donation
- 5 Branches
- 6 In popular culture
- 7 See also
- 8 References
- 9 External links

# Purpose and identity

Camp Quest's mission statement declares that the camp is "dedicated to improving the human condition through rational inquiry, critical and creative thinking, scientific method, self-respect, ethics, competency, democracy, free speech, and the separation of religion and government guaranteed by the Constitution of the United States". [1] The camp intended goal is to offer a space where children who are already nonreligious can feel comfortable and accepted. [4] The UK branch of Camp Quest stated in 2009 that the point of their camp was "not a case of being told".

**Camp Quest** 

CQ

**Motto** Camp Quest provides an

educational adventure shaped by

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Exhibit F

fun, friends and freethought, featuring science, natural wonder

and humanist values.

Formation 1996

Founders Edwin Kagin, Helen Kagin, Ed

McAndrews, Elizabeth Oldiges, Nikki Orlemann, David Scheidt

and Vern Uchtman

Founded at Boone County, Kentucky

Type Non Governmental Organization

Legal status Incorporated company

**Purpose** "To offer a summer camp program

designed for children from atheist,

agnostic, humanist and freethinking families."

Headquarters Columbus, Ohio

**Services** Provide summer camps for youth

ages 8-17 in the United States and

other countries.

Website Camp Quest (http://www.camp-qu

est.org/)

what to think about concepts such as God, just how to think" about such concepts. [5]

The camp's logo is based on an idea of Edwin Kagin and the original artwork of his daughter, Kathryn. The letters "C" and "Q" are combined into a sort of infinity symbol. The letters "CQ" are usually accompanied by the Morse Code for those letters, CQ being code shorthand for "Does anybody want to talk?". The name Quest is actually an acronym for Question, Understand, Explore, Search, Test. The camp's slogan is, "Camp Quest. It's beyond belief!" [6]



owner. Check out that Camp Quest sticker! Also for more fun check out the activities at the end of this article for more science fun!

to own one! Congrats to Neil Polzin, the Vice Chair of Camp Quest, Camp Director at Camp Quest West, and new Miral

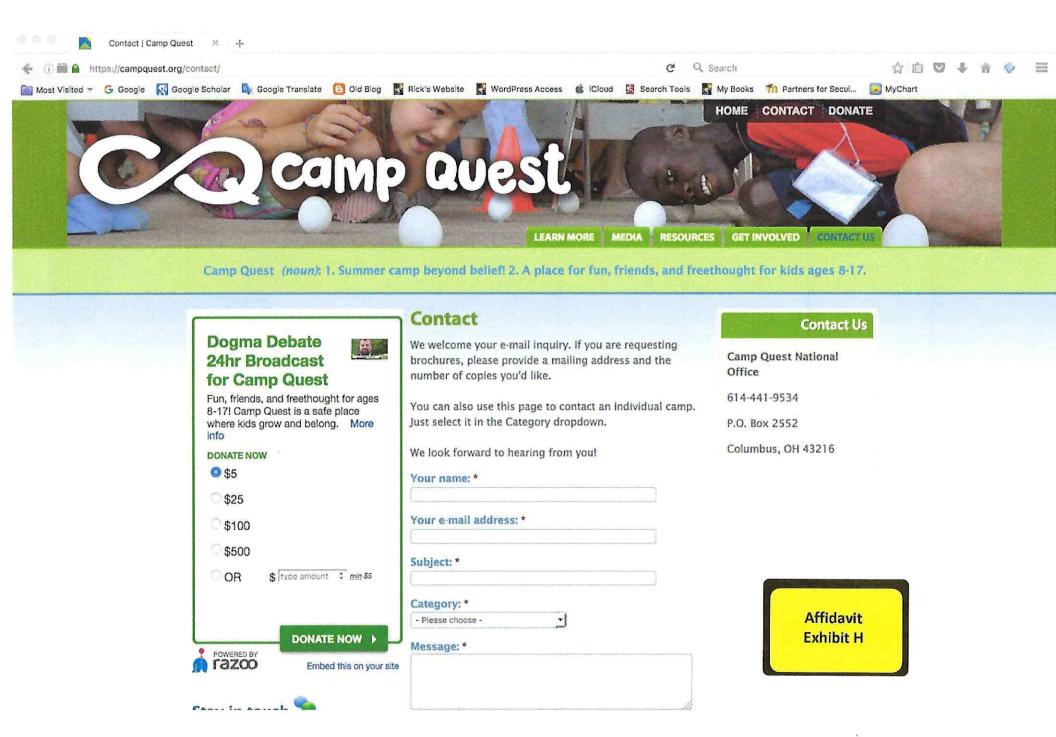
Affidavit

Exhibit G

The Back to the Future movie trilogy came out in the 1980s and showed what life would be like 30 years from then, in 2015. Well, we don't have flying cars, Mr. Fusion personal power plants, or hoverboards...but we do have some pretty amazing technologies that no one predicted. Your phone has way more computing power than the car-sized computers NASA used to land on the moon!



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P.O. 80x 2552
Columbus, OH 43216
614-441-9534
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**Branch** Machine (/web/)

http://freethoughtblogs.com/carrier/archives/10017

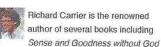
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« Appearing at UCLA Next Week! (/web/20160416112518/http://freethoughtblogs.com/carrier/archives/10014)

(/web/20160416112518/http://www.richardcarrier.info/BooksbyRichardcarrier.html#SAG)

Proving History (/web/20160416112518/http://www.richardcarrier.infd/BBXkSp./#RB/hgz/eurriev.napl-And I may need your help. I'll explain in a moment. But here's the basic idea and On the Historicity of Jesus

(/web/20160416112518/http://www.richardcarrier.info/BooksbyRichardCarrier.html#OHJ),
Because Christians don't understand how evidence works, they've literally as well as numerous articles online and in argued (/web/20160416112518/http://rightreason.org/2012/does-richard-carrierprint. His avid readers span the world from exist/) that there is no more evidence for my existence than there is for the Hong Kong to Poland. With a Ph.D. in existence of Jesus their Christ. Never mind that that's already wildly false. Here ancient history from Columbia University, he is your chance to see how evidence works, and confirm for yourself, as an specializes in the modern philosophy of eyewitness, that I do indeed exist! No silly hearsay for you anymore. Oh no. This naturalism, humanism, and social justice, the origins of Christianity, and the intellectual

is the real deal. (Jesus, meanwhile, promised he'd be back lickity split, and it's been nearly 2,000 years, so...) Lam moving to Columbus, Ohio, for good and all this May (2016). And I'm taking

a moving truck and towing my car all the way across country from my current and soon past home in Stockton, California, with the assist of some of my girlfriends as relief drivers on different legs of the trip (that's really above and beyond...I'm extremely grateful

It's a modern day whistle stop tour. I'll be driving each day from one major city to the next, and giving a talk, or appearing in some public fashion selling and signing my books, and happily chatting and glad-handing and posing for photos for anyone who wants to (/web/20160416112518/http://www.richardcarrier.info/jerify my historicity.





A Trivial Knot (/web/20160416112518/http://freethought blogs.com/atrivialknot/)

history of Greece and Rome, with particular expertise in ancient philosophy, science and

technology. He has also become a noted

defender of scientific and moral realism.

Bayesian reasoning, and the methods and

epistemology of history. For more about him and his work visit richardcarrier.info

Affinity

(/web/20160416112518/http://freethought blogs.com/affinity/)

Alethian Worldview

(/web/20160416112518/http://freethought blogs.com/alethianworldview/)

Anjuli Pandavar

(/web/20160416112518/http://freethought blogs.com/anjuli/)

Atheism, Music, and More...

(/web/20160416112518/http://freethought blogs.com/natehevens/)

Bi Any Means

(/web/20160416112518/http://freethought

blogs.com/bianymeans/)

Comradde PhysioProffe

(/web/20160416112518/http://freethought

blogs.com/physioprof/)

Death to Squirrels

(/web/20160416112518/http://freethought

blogs.com/iris/

Fierce Roller

(/web/20160416112518/http://freethought blogs.com/fierceroller/)

I'm developing tour stops already for Reno, Nevada (Tuesday night, May 24), Omaha, Nebraska (Friday night, May 27), and Kansas City, Missouri (Saturday night, May 28). I'll announce those details as soon as they are finalized and there is a public page. somewhere promoting them.

But here is where I need your help.

I have made all possible efforts to contact organizations and arrange tour stops for Salt Lake City, Utah; Denver, Colorado; and Indianapolis, Indiana. And that hasn't worked. There is a campus group near SLC that might pull something together for my stop Wednesday night May 25, but I haven't gotten a confirmation, so I don't know if that will happen. Indianapolis doesn't want to compete with Memorial Day parties that Sunday May 29. And Denver just seems not to have been interested for Thursday night May 26

So anyone who lives in or near those three places and wants to see me make an appearance on the respective date, I'd apprecial any help you can offer to make something happen. I'd love to show up and speak about something, hang out, sell some books...a confirm my historicity with you and all, with photos, or signing odd things, or whatever. Here are some ideas...

For Indianapolis, maybe the best plan would be if there is already a large enough gathering of interested atheists for a Memorial Day party (at least thirty or so!), I could just show up and join you all. As long as I can publicly announce the location, sell books at and there's any alcohol other than beer, I'm golden. So anyone who has a bead on that, let me know! It needn't be exactly in Indianapolis. Anywhere within an hour's drive around that epicenter. All the better if you have a place my girlfriend and I can crash for the night (not a requirement, just a hope). And BTW, given what Memorial Day is all about, do recall, as it happens, I am a veteran! Of a war even (I very importantly guarded an estuary in San Diego against Saddam Hussein's phantom submarine). True am not dead. Nor have any fallen comrades. But I'll have my National Service Medal on hand, And Letters of Commendation. And marksmanship ribbons. They'll just be in a little box, like a Korean Toe (only Kids in the Hall fans will get that one). I'll still make a point of calling a solemn toast to those who've died for us in service. Because, seriously.

For Denver, I can make anything along the I-25 that's en route to KC (e.g. Fort Collins, Boulder, Colorado Springs), Surely some group out there wants to be in on this historic(ity) event! If you want me to deliver a lecture, my only charge is \$200 (negotiable). If it's a party, and I don't have to work, it's free (see Indianapolis above for requirements). And I am also looking for anyone with a guest room for my girlfriend and I to stay that night.

For Salt Lake City, or anything within an hour's drive of SLC, the same.





#### Case: 2:16-cv-00906-MHW-EPD Doc #: 17-10 Filed: 12/22/16 Page: 2 of 2 PAGEID #: 391 Anyone who has offers, ideas, anything helpful, email me (mailto:rcarrier@infidels.org). If we can pull something togethe (/web/20160416112518/http://freethought I'll appreciate it! blogs.com/geekyhumanist/) Print More Great American Satan (/web/20160416112518/http://freethought Like this: blogs.com/gas/) Heteronormative Patriarchy for Men Loading. (/web/20160416112518/http://freethought blogs.com/hetpat/) Incongruous Circumspection (/web/20160416112518/http://freethought blogs.com/inspection/) Appearing at UCLA Next Week! (/web/20160416112518/http://freethoughtblogs.com/carrier/archives/10014) Kittywhumpus (/web/20160416112518/http://freethought blogs.com/kittywhumpus/) & Richard Carrier (/web/20160416112518/http://freethoughtblogs.com/carrier/archives/author/carrier) m April 16, 2016 Mano Singham (/web/20160416112518/http://freethought appearances (/web/20160416112518/http://freethoughtblogs.com/carrier/archives/category/appearances), Christianity blogs.com/singham/) (/web/20160416112518/http://freethoughtblogs.com/carrier/archives/category/christianity), Jesus (/web/20160416112518/http://freethoughtblogs.com/carrier/archives/category/jesus), philosophy Maryam Namazie (/web/20160416112518/http://freethoughtblogs.com/carrier/archives/category/philosophy) (/web/20160416112518/http://freethought blogs.com/maryamnamazie/) Log in to comment (/web/20160416112518/http://freethoughtblogs.com/wp-login.php? Nastik Deliberations redirect\_to=http://freethoughtblogs.com/carrier/archives/10017) (/web/20160416112518/http://freethought blogs.com/arun/) **New Frontier** (/web/20160416112518/http://freethought blogs.com/frontier/) Leave a Reply Nirmukta on FTB Connect with (/web/20160416112518/http://freethought blogs.com/nirmukta/) Your email address will not be published. Required fields are marked \* Oceanoxia Comment (/web/20160416112518/http://freethought blogs.com/oceanoxia/) Pharyngula (/web/20160416112518/http://freethought blogs.com/pharyngula/) Pro-Science (/web/20160416112518/http://freethought blogs.com/kriswager/\ Reasonable Doubts Name \* (/web/20160416112518/http://freethought blogs.com/reasonabledoubts/) Recursivity Email \* (/web/20160416112518/http://freethought blogs.com/recursivity/) Website Richard Carrier Blogs (/web/20160416112518/http://freethought blogs.com/carrier/) Post Comment Preview Taslima Nasreen Click the "Preview" button to preview your comment here. (/web/20160416112518/http://freethought Notify me of followup comments via e-mail. You can also subscribe

blogs.com/taslima/)

The Atheist Experience

(/web/20160416112518/http://freethought

blogs.com/axp/)

The Digital Cuttlefish

(/web/20160416112518/http://freethought

blogs.com/cuttlefish/)

The Hispanic Atheist

(/web/20160416112518/http://freethought

blogs.com/thathispanicatheist/)

The Indelible Stamp

(/web/20160416112518/http://freethought

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Notify me of follow-up comments by email.

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Richard Carrier is the renowned author of several books including Sense and Goodness without God « Learn the Basics of New Testament Scholarship & How to Make Good Use of It!

Regarding the Accusations Made by Amy Fra (/web/20160707070237/http://freethoughtblogs.com/carrier/arch

(/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10255)

(/web/20160707070237/http://www.richardcarrier.interpoksbyRichardCarrier.html#SAGExists Tour Begins!

(/web/20160707070237/http://www.richardcarrier.info/BooksbyRichardCarrier.ntmi#PH), and On the Historicity of Jesus

Today I head out across the country. Come visit me on one of my stops!

print. His avid readers span the world from Hong Kong to Poland. With a Ph.D. in ancient history from Columbia University, he specializes in the modern philosophy of naturalism, humanism, and social justice, the origins of Christianity, and the intellectual history of Greece and Rome, with particular expertise in ancient philosophy, science and technology. He has also become a noted defender of scientific and moral realism, Bayesian reasoning, and the methods and epistemology of history. For more about him

and his work visit richardcarrier into

(/web/20160707070237/http://www.richardcarrier.info/BooksbyRichardCarrier.html#OHJ), I am moving to Columbus, Ohio, for good and all. And I'm taking a moving truck and towing my car all the way across country from my current and soon past home in Stockton, California.

Because Christians don't understand how evidence works, they've literally argued

(/web/20160707070237/http://rightreason.org/2012/does-richard-carrier-exist/) that there is no more evidence for my existence that there is for the existence of Jesus their Christ. Never mind that that's already wildly false. Here is your chance to see how evidence works, and confirm for yourself, as an eyewitness, that I do indeed exist!

This is a modern-day whistle-stop tour. I'll be driving each day from one major city to the next, and giving a talk, or appearing in some public fashion selling and signing my books, and happily chatting and glad-handing and posing for photos for anyone who wants to verify my historicity.

Here is the tour schedule...

- Reno (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10208) (May 24)
- (/web/20160707070237/http://www.richardcarrier.info/). SLC (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10198) (May 25)
  - Denver (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10219) (May 26)
  - Omaha (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10187) (May 27)
  - Kansas City (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10177) (May 28: then (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10219) May 29)
  - Columbus (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10164) (June 14)

Come join us at any of the above events!

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Loading.

Print

Against the Grain

blogs.com/affinity/)

Freethought Blogs

blogs.com/atrivialknot/)

A Trivial Knot

(/web/20160707070237/http://freethought blogs.com/atg/)

(/web/20160707070237/http://freethought

(/web/20160707070237/http://freethought

Aged Reasoner: Common Sense for Now

People

(/web/20160707070237/http://freethought

blogs.com/reasoner/\

Alethian Worldview

(/web/20160707070237/http://freethought

blogs.com/alethianworldview/)

Anjuli Pandavar

(/web/20160707070237/http://freethought

blogs.com/anjuli/)

Atheism, Music, and More...

(/web/20160707070237/http://freethought

blogs.com/natehevens/)

Bi Any Means

(/web/20160707070237/http://freethought

blogs.com/bianymeans/)

Comradde PhysioProffe

(/web/20160707070237/http://freethought

« Learn the Basics of New Testament Scholarship & How to Make Regarding the Accusations Made by Amy Fra (/web/20160707070237/http://freethoughtblogs.com/carrier/arch (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10255)

& Richard Carrier (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/author/carrier)

May 24, 2016

appearances (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/category/appearances)

Log in to comment (/web/20160707070237/http://freethoughtblogs.com/wp-login.php? redirect\_to=http://freethoughtblogs.com/carrier/archives/10259)

**Affidavit** Exhibit J

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blogs.com/physioprof/)

Death to Squirrels

(/web/20160707070237/http://freethought blogs.com/iris/)

Fierce Roller

(/web/20160707070237/http://freethought blogs.com/fierceroller/)

FtB News

(/web/20160707070237/http://freethought blogs.com/ftbnews/)

Geeky Humanist

(/web/20160707070237/http://freethought blogs.com/geekyhumanist/)

Gestaltz

(/web/20160707070237/http://freethought blogs.com/gestaltz/)

Great American Satan

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Heteronormative Patriarchy for Men

(/web/20160707070237/http://freethought

blogs.com/hetpat/)

Incongruous Circumspection

(/web/20160707070237/http://freethought

blogs.com/inspection/)

Jonathan's Musings

(/web/20160707070237/http://freethought

blogs.com/musings/)

Kittywhumpus

(/web/20160707070237/http://freethought

blogs.com/kittywhumpus/)

Mano Singham

(/web/20160707070237/http://freethought

blogs.com/singham/)

Maryam Namazie

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blogs.com/maryamnamazie/)

Nastik Deliberations

(/web/20160707070237/http://freethought

blogs.com/arun/)

New Frontier

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blogs.com/frontier/)

Nirmukta on FTB

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blogs.com/nirmukta/)

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blogs.com/primatechess/)

Pro-Science

(/web/20160707070237/http://freethought

blogs.com/kriswager/)

Reasonable Doubts

(/web/20160707070237/http://freethought

blogs.com/reasonabledoubts/)

Recursivity

(/web/20160707070237/http://freethought

### Comments

1. Jonathan C says

May 24, 2016 at 4:13 am (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059480)

Hi Rich, I am surprised you survived for as long as you did in Stockton? I have heard it is one of the worst hit places regarding the economy in California and is riddled with crime and drugs etc. BTW, why Columbus? Will any of your talks on your upcomi tour be recorded and posted online? Thanks, John



Richard Carrier (/web/20160707070237/http://www.richardcarrier.info/) says

May 28, 2016 at 11:18 am (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-

Yes, some were recorded but not all, and some video and some just audio. Keep your eye out for those.

Why Columbus? Things (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059487).

Stockton? In actual fact, the news makes everything sound scarier than it is. I lived in one of the worst neighborhoods for over year and I was fine. The worst to worry about is petty crime. Which can be harmful financially, but it's not life threatening. I hea more gunfire nightly in Richmond. Almost none ever in Stockton. Most of the "crime" is drug related; thus, created by government Prohibition.

And as far as the poverty, which is indeed bad, Stockton is on the upturn, and most poor people by far are law-abiding. Indeed I'd bet if a study were done, the rate of criminality probably increases with wealth (when you count all forms of white collar crin including non-petty tax evasion and fraud).

2. 0

Shivam Brahmin says

May 24, 2016 at 10:09 pm (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059481)

Are you in advising Robert Price in his upcoming debate with Ehrman, particularly the material in your last Ehrman rebuttal?



Richard Carrier (/web/20160707070237/http://www.richardcarrier.info/) says

May 28, 2016 at 11:09 am (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059490)

That's a long way off. I doubt he needs advice. But I'll help if I can.



cdaj9e3voqacrjak566z says

May 25, 2016 at 2:19 pm (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059482)

Hi Richard Carrier,

So the ancient Jews were Judaizing Hellenism rather than Hellenizing Judaism? Are they just two sides of the same coin in th historical case?

I don't think you could have been invented so quickly. But if there was a conspiracy...I think there were probably many minimalist historians minted who grew up knowing the patriarchs were mythical.

Laurence Crossen



Richard Carrier (/web/20160707070237/http://www.richardcarrier.info/) says

May 28, 2016 at 11:05 am (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059489)

I don't know what you are referring to.



Ironymuch says

May 25, 2016 at 7:36 pm (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059483)

Uhh... That post questioning your existence was a satire of your arguments. Sorry to break it to you.



Richard Carrier (/web/20160707070237/http://www.richardcarrier.info/) says

May 28, 2016 at 11:04 am (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059488)

# Case: 2:16-cv-00906-MHW-EPD Doc #: 17-11 Filed: 12/22/16 Page: 3 of 3 PAGEID #: 394

blogs.com/recursivity/)

SecularVoices on FtB

(/web/20160707070237/http://freethought

blogs.com/secularvoices/)

Stder

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blogs.com/stderr/)

Taslima Nasreen

(/web/20160707070237/http://freethought blogs.com/taslima/)

The Atheist Experience

(/web/20160707070237/http://freethought

blogs.com/axp/)

The Digital Cuttlefish

(/web/20160707070237/http://freethought

blogs.com/cuttlefish/)

The Hispanic Atheist

(/web/20160707070237/http://freethought

blogs.com/thathispanicatheist/)

The Indelible Stamp

(/web/20160707070237/http://freethought

blogs.com/indelible/)

The Zingularity

(/web/20160707070237/http://freethought

blogs.com/zingularity/)

Thoughts of Crys

(/web/20160707070237/http://freethought

blogs.com/thoughtsofcrys/)

YEMMYnisting

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blogs.com/yemmynisting/)

### RECENT POSTS ON FTB

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YEMMYnisting

(/web/201607070237/http://freethoughtblogs.com/yemmynisti ng) - Published by Yemisi Ilosanmi

(/web/20160707070237/http://freethoughtblogs.com/yemmynist ng/authociyemmynisting)

Helium discovery in Africa - a game changer

(/web/20160707070237/http://freethough tblogs.com/arun/2016/07/06/heliumdiscovery-in-africa-a-game-changer/) Nastik Diffusations

(/web/20160707070237/http://freethoughtblogs.com/arun) -

Published by Arun

(/web/20160707070237/http://freethoughtblogs.com/arun/author/ /arunmadhavan)

The Nature of Democracy (/web/20160707070237/http://freethough tblogs.com/gestaltz/2016/07/06/the-nature-of-democracy/)

(Aveb/20160707070237/http://freethoughtblogs.com/gestaltz) -Published by gestaltz

(Aveb/20160707070237/http://freethoughtblogs.com/gestaltz/aut hor/gestaltz)

"Ask The Strategic Genius" thread (/web/20160707070237/http://freethough tblogs.com/stderr/2016/07/06/ask-thestrategic-genius-thread/)

(/web/20160707070237/http://freelhoughtblogs.com/stderr) -

The satire only works if they believe the analogy holds.

If in fact the evidence for my existence is good, in precisely the ways it isn't for Jesus, the analogy doesn't hold.

So at best, they are writing a satire of themselves.

Which of course they were not doing. They actually think their argument holds. That's why they think it's a satire of me and no them.

5. (b) Minu

Minus says

May 25, 2016 at 8:26 pm (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059484)

Why-o Ohio?



Richard Carrier (/web/20160707070237/http://www.richardcarrier.info/) says

May 28, 2016 at 11:02 am (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-

Maximum concentration of girlfriends. Better living at less expense, Better geographic location for speaking tours. But mostly t girlfriends.

Matthew Prorok (/web/20160707070237/http://inaweofeverything.blogspot.com/) says
 May 26, 2016 at 12:07 pm (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059485)

Looking forward to welcoming you to Columbus! It's a great city.

r. cdaj9e3voqacrjak566z says

May 28, 2016 at 5:58 pm (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059495)

In response to Richard Carrier: "I don't know what you are referring to."

Sorry, I did not express myself well.

I was referring to the "they've literally argued" link you gave in this post, which said;

"He is also supposed to be relatively young, which makes him one of, say, 3,000 or so History Ph. D.s to have been minted in the past five years... Of the 3,000 or so History Ph.D.s minted in the last five years, and... how many are mythicists? It's a pre safe bet that the number is close to zero." So I said; "I think there were probably many minimalist historians minted who grew I knowing the patriarchs were mythical." And I think there are many millions of people ready to learn and recognize that Jesus was not in origin a historical person.

Referring to your demonstrations that Christianity could have been invented in a short period of time I said; "I don't think you could have been invented so quickly. But if there was a conspiracy...;)

In at least one of your talks I heard you say that the ancient Israelite's Judaized elements of Greco-Roman tradition. So I wonder, "So the ancient Jews were Judaizing Hellenism rather than Hellenizing Judaism? Are they just two sides of the same syncretistic coin in this historical case?" Did Philo see himself as Judaizing Hellenism or Hellenizing Judaism?

-Laurence Crossen

8. O

Alif says

May 28, 2016 at 11:56 pm (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-1059496)

hullo dr carrier

U cud easily du lecturs at OSU https://religion.osu.edu/ (/web/20160707070237/https://religion.osu.edu/)

9. cdaj9e3voqacrjak566z says

May 29, 2016 at 9:20 am (/web/20160707070237/http://freethoughtblogs.com/carrier/archives/10259#comment-

The only way the Christians could maintain the historicity of Jesus was to ignore the issue and maintain the assumption. Fortunately, Richard Carrier is not going away and the more Christians engage him the more unmistakable it becomes that Jesus never existed.

-Laurence Crossen

**4** 7 🕨

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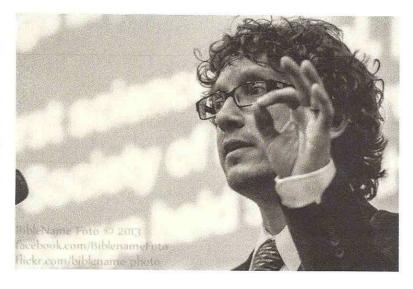
Discussions

Join us!

# The OmahaCoR Presents: An Evening with Dr. Richard Carrier, Ph.D.

May 27 · 7:30 PM

University of Nebraska at Omaha, CPACS Bldg, Rm 101



The Omaha Coalition of Reason is hosting a special talk by Dr. Richard Carrier, Ph.D. entitled "Science as Philosophy in Ancient Rome."

Dr. Carrier will discuss how ancient science evolved from Western philosophy, and set the foundations for modern science, whose remaining connections with philosophy remain nearly the same. What did they accomplish back then? And what has changed?

Dr. Carrier has a Ph.D. in the history of philosophy from Columbia University, and is a published philosopher and historian, specializing in contemporary philosophy of naturalism, and in Greco-Roman philosophy, science, and religion, and the origins of Christianity. He blogs regularly, lectures for community groups worldwide, and teaches courses online. He is the author of many books including Sense and Goodness without God, On the Historicity of Jesus, and Proving History, as well as chapters in several anthologies and articles in academic journals. For more about Dr. Carrier and his work see www.richardcarrier.info.

### 22 went

William

Danger N.

+11

Co-

Organizer,

**Event Host** 

Laurey S.

Organizer,

**Event Host** 

Edie S.

Les L.

Co-

Organizer

Joe M.

Dan M.

Joel W.

Co-

Organizer

Charles

Co-

Organizer

Affidavit Exhibit K

Case: 2:16-cv-00906-MHW-EPD Doc #: 17-12 Filed: 12/22/16 Page: 2 of 2 PAGEID #: 396 Omaha Coalition of Reason Proudly Presents... An Evening with Dr. Richard Carrier

This event is part of the "Richard Carrier Exists" tour (http://freethoughtblogs.com/carrier/archives/10017). A whistle-stop on his move across country to Ohio. Come verify Dr. Carrier's historicity! You can even document it with a photograph. Or a signature on a book.

Tickets are just \$5.00 in advance (\$8.00 at the door) and can be purchased at any of our scheduled meetups between now and the event, or online at omahacor.brownpapertickets.com.

You'll also have the chance to meet:

7 People from "Atheist Community of Omaha"

9 Humanists from "Omaha Metro Area Humanist Association (OMAHA)"

A total of 22 people are expected to attend!

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Julia +1

A former member

Start a Meetup Group

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(/web/20160707070203/http://freethoughtblogs.com/)





Richard Carrier is the renowned author of several books including Sense and Goodness without God « Kinky Sexy Stuff: Speaking in Columbus, Ohio, This June The Richard Carrier Exists Tour: Stop 2, Salt Lake C (/web/20160707070203/http://freethoughtblogs.com/carrier/archive(skildbl/le0)160707070203/http://freethoughtblogs.com/carrier/arch

## (/web/20160707070203/http://www.richardcarrier.info@pokskyflichard Carrier Exists Tour: Stop 4, Omaha! Proving History

(/web/20160707070203/http://www.richardcarrier.info/BooksbyRichardCarrier.html#PH),

and On the Historicity of Jesus

as well as numerous articles online and in print. His avid readers span the world from

Hong Kong to Poland. With a Ph.D. in ancient history from Columbia University, he specializes in the modern philosophy of naturalism, humanism, and social justice, the origins of Christianity, and the intellectual history of Greece and Rome, with particular expertise in ancient philosophy, science and technology. He has also become a noted defender of scientific and moral realism, Bayesian reasoning, and the methods and epistemology of history. For more about him and his work visit richardcarrier.info

(/web/20160707070203/http://www.richardcarrier.info/)

I'll be announcing the events along the Richard Carrier Exists Tour as they are (/web/20160707070203/http://www.richardcarrier.info@elibesby@enghiodinformhar/bleptaska. That's my fourth stop on the move across country. And that's Friday night, May 27. Come verify my historicity! Pictures & signatures welcome.

> Sponsored by the Omaha Coalition of Reason (/web/20160707070203/http://unitedcor.org/coalition-of-reason/omaha/), I'll be speaking on Science as Philosophy in Ancient Rome. In which I'll talk

> about "how ancient science evolved from Western philosophy, and set the foundations for modern science, whose remaining connections with philosophy remain nearly the same. What did they accomplish back then? And what has changed?"

Starts at 7:30pm at the University of Nebraska at Omaha, CPACS Building, Room 101 (6001 Dodge Street in Omaha). The CPAC Building is located immediately southeast of the iconic UNO clock tower.

I'll also be doing Q&A and selling and signing books after.

Tickets \$5 in advance, \$8 at the door.

**38** Freethought Blogs

A Trivial Knot

(/web/20160707070203/http://freethought blogs.com/atrivialknot/)

Affinity

(/web/20160707070203/http://freethought blogs.com/affinity/)

Against the Grain

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Aged Reasoner: Common Sense for Now People

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Alethian Worldview

(/web/20160707070203/http://freethought

blogs.com/alethianworldview/)

Anjuli Pandavar

(/web/20160707070203/http://freethought blogs.com/anjuli/)

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Comradde PhysioProffe

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Tickets here (/web/20160707070203/http://omahacor.brownpapertickets.com/). More details and updates here (/web/20160707070203/http://www.meetup.com/REASON-Rationalists-Empiricists-And-Skeptics-Of-Nebraska/events/230751196/).

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Richard Carrier (/web/20160707070203/http://freethoughtblogs.com/carrier/archives/author/carrier) May 4, 2016

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**Affidavit** Exhibit L



Follow

The Richard Carrier Exists Tour: Stop 4, Omaha! https://t.co/aJCPYnobIT https://t.co/xVF6lw7Q7E



### Dr. Richard Carrier (@RichardCCarrier) posted a photo on Twitter

Get the whole picture - and other photos from Dr. Richard Carrier

PIC.TWITTER.COM/XVF6IW7Q7E I BY DR. RICHARD



Matti Dwyer Would love to attend! Keep us posted if you head through Portland, OR!

Like · May 4 at 12:54pm



Michael Jonckheere I'll be there. Do I get extra credit? 😏 Like · May 4 at 10.13pm

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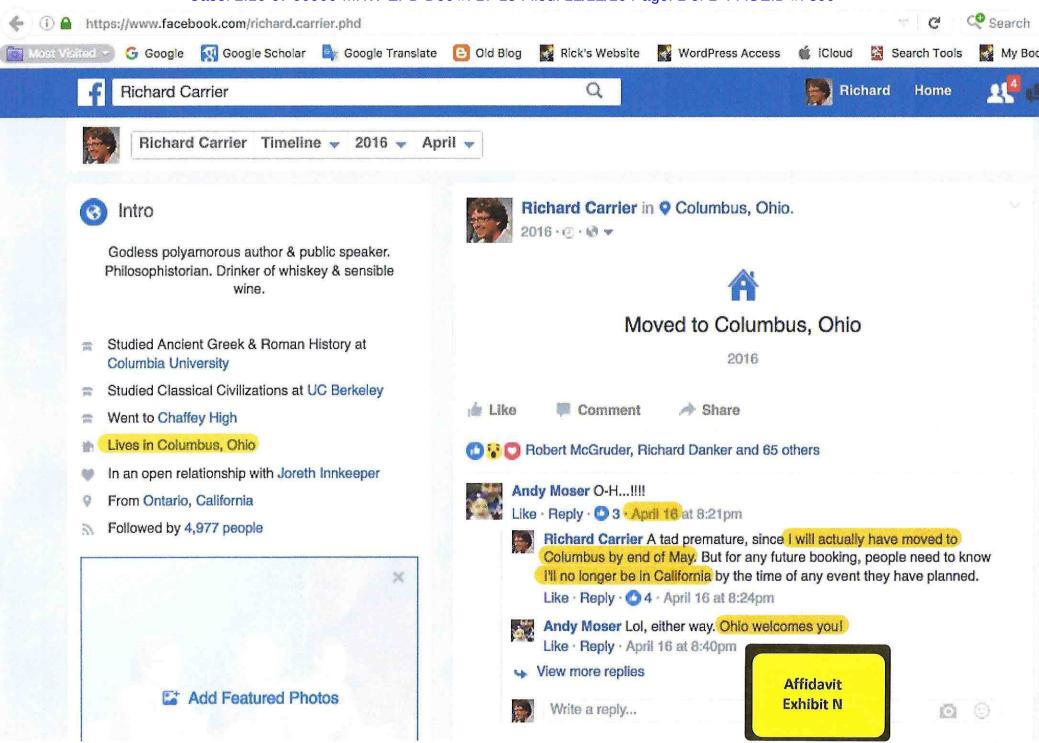
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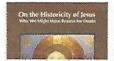
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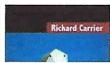
**Affidavit** Exhibit M



























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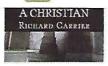












2,441

503

2,535

316



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Dr. Richard Carrier

@RichardCCarrier

Author, Speaker, Philosopher, Historian.



& richardcarrier.info

iii Joined September 2015

Born in 1969



94 Photos and videos



### **Tweets**

# Tweets & replies

Media





Dr. Richard Carrier @Richard CCarrier · Dec 4 Dude! For next half hour, donations get @ShelleySegal to sing & it's a double match, so your donation is tripled!

### 24-Hour Broadcast!

Dogma Debate 24-Hour Broadcast Benefiting Camp Quest Starting Saturday Dec 3 at 4PM US/Central! What better way to cultivate a secular society, than through ... dogmadebate.com









2



Dr. Richard Carrier @Richard Carrier · Dec 4 Oh, next hour, one of my favorite comedians, @keithlowell is going to be on the Dogma Debate Camp Quest marathon!















### 24-Hour Broadcast!

Dogma Debate 24-Hour Broadcast Benefiting Camp Quest Starting Saturday Dec 3 at 4PM US/Central! What better way to cultivate a secular society, than through ... dogmadebate.com





Dr. Richard Carrier @Richard Carrier · Dec 4

Hey everyone! Check out the Dogma Debate marathon for Camp Quest today: dogmadebate.com/cq/ Amazing guests & stories. In 20th

hour now!

**Affidavit** Exhibit O



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BOOKING DR. CARRIER

**Affidavit** Exhibit P

# Booking Dr. Carrier

For any speaking engagement I usually require travel & lodging, a \$300 honorarium, and an opportunity to sell my books at your event. Some of that is negotiable. If you want to do a teleconference, I charge \$150 per hour, and no expenses. I also teach regular courses online for considerably less, though not live.

But here are some additional options and things to know...

The largest expense is always transportation

I live in Columbus, Ohio, within twenty minutes of its airport. Often the lowest expense is lodging. I prefer a nonsmoking room at any reasonable establishment. But if you can find volunteers to take me in, all I need is a Search This Blog

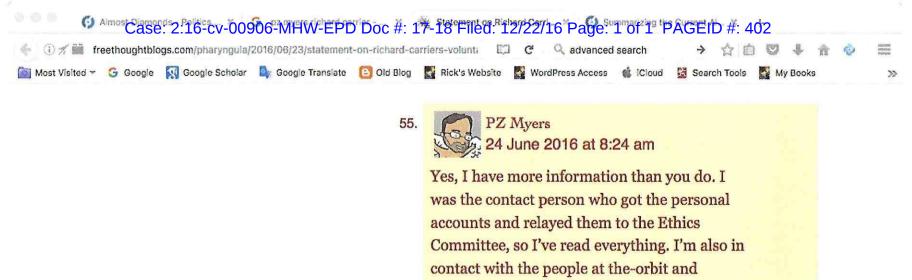
SEARCH HERE ...

Follow Richard Carrier's Work

Announcements







Yes, I have more information than you do. I was the contact person who got the personal accounts and relayed them to the Ethics
Committee, so I've read everything. I'm also in contact with the people at the-orbit and skepticon who've been dealing with this. I've had a short phone conversation with Carrier in which he presented his ultimatums. And most damningly, we've seen his 'defense', which I sincerely hope he doesn't use for his own sake, which consists almost entirely of extortionate threats to reveal secrets of the sex life of his accusers.

The hole he's digging in public really is nothing compared to the mohole he's excavating in private.



56.



Caine 24 June 2016 at 8:31 am

Affidavit Exhibit Q

PZ:

And most damningly, we've seen his 'defense', which I sincerely hope he doesn't use for his own sake,

I sincerely hope he doesn't use that for everyone's sake.





# Stephanie Zvan 24 June 2016 at 11:03 am

# cadfile @48:

Where were we? Reading, watching, collecting information. Arguing with Carrier's self-justifications, sometimes more publicly, sometimes less. Are you objecting that we weren't blogging about it all then? If you are, go talk to the people who claim every objection to bad behavior short of rape is a witch-hunting overreaction.

Thing is, you have to choose. Are we going to be allowed to talk about low-level problems as they problems they are at that type without being pushed out of our own damned movement because we're "destroying" the lives and reputations of oh so important men? Or are you going to get hit like this with the wall of information required to convince people this is a problem worth talking about? One or the other. Which is it?

If you want the first one, go deal with all the people who have been pushing for the second for the last five years. I've been working on that problem the entire time. Your turn.

Affidavit Exhibit R

63. Stephanie Zvan
24 June 2016 at 11:06 am

Blergh, typos. I'm tired. Everyone who says we do this kind of thing for the hits has no idea how much writing time we lose to dealing with everything behind the scenes.



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He wants to sue for defamation, for knowingly issuing false statements about his behavior.

That's going to be difficult, since all we said is that we had reports of aggressive sexual behavior, which is true, and that we were investigating further. Skepticon said more and took direct action, but they have multiple witnesses to what they're saying happened. Even if he somehow discredits those accusers by dumping their sexual histories into the record, it doesn't change the truth of what we said, or that Skepticon had legitimate concerns that they had to act upon, and it also effectively confirms what all the accusers said.

82.

Tethys 25 June 2016 at 10:28 am

Affidavit Exhibit S >>

PZ

No. I've yelled and hollered that backchannel conversations are totally private and not to be breached in public. That's not going to change, ever.

Do you not make a specific exception for threats right in the sidebar? I absolutely agree that any communications between him and the ethics board/SSA/victims should remain completely private, but if he is now no longer

M Q col

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### Freethought Blogs

FREETHOUGHT RESISTANCE (http://freethoughtblogs.com/resist/)

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Against the Grain

(http://freethoughtblogs.com/atg/)

Aged Reasoner: Common Sense for Now People

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Alethian Worldview

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Anjuli Pandavar

(http://freethoughtblogs.com/anjuli/)

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Freethinking Ahead

(http://freethoughtblogs.com/freethinkinga head/)

FtB News

(http://freethoughtblogs.com/ftbnews/)

Geeky Humanist

(http://freethoughtblogs.com/geekyhumani st/)

Great American Satan

(http://freethoughtblogs.com/gas/)

Heteronormative Patriarchy for Men

(http://freethoughtblogs.com/hetpat/)

I Have Forgiven Jesus

(http://freethoughtblogs.com/forgiven/)

Incongruous Circumspection

(http://freethoughtblogs.com/inspection/)

(http://freethoughtblogs.com/intransitive/)

Jonathan's Musings

(http://freethoughtblogs.com/musings/)

Kittywhumpus

(http://freethoughtblogs.com/kittywhumpu

Mano Singham

(http://freethoughtblogs.com/singham/)



« Winter is coming (http://freethoughtblogs.com/pharyngula/2016/09/24/winter-is-

Move over, Martin Shkreli: Palmer Luckey is he (http://freethoughtblogs.com/pharyngula/2016/09/24/move-ov martin-shkreli-palmer-luckey-is-here/

### Commutation of sentence

There I was, heaving a bow saw against the shrubbery, sweat running into my eyes, red-faced, and maybe looking a little over stressed and maybe looking. a little over-stressed, and my wife gives me one of her looks and tells me that maybe I ought to call it a day, she was about to drive off to the dump with a load of brush and was a little bit afraid that she'd find me slumped into a unconscious heap when she got back.

Now you know, this is an affront to my manhood. I quickly marshaled many fierce replies, but I was slowed in delivering them because I was panting so hard. Otherwise, I was ready to tell her...

"At least I will have died like a man, with my tool in my hand!"

Or maybe the classic,

"We all gotta go some time."

But then it sunk in that if I said anything like that, I would sound like Gary Johnson.



My gob, what an idiot. Aren't you New Mexicans a little embarrassed about having elected this guy?

So I surrendered meekly and have gone into the house. I guess being sensible and cautious is one way to avoid surrendering to our fate.

Oh! And as I walked into the house, I got handed some bulky certified mail. Richard Carrier is suing 7 entities, and I'm two of them. He's demanding \$1,050,000 in compensation and another \$1,050,000 in punitive damages. So there's another fate I won't be surrendering to.

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**Affidavit** Exhibit T

# Case: 2:16-cv-00906-MHW-EPD Doc #: 17-21 Filed: 12/22/16 Page: 2 of 10 PAGEID #: 406

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#### Polotor

(http://freethbughtblogs.com/pharyng (http://freethoughtblogs.com/pharyngula/2 christina-has-a-new-book/pharyngula/2

It's called Bending: Dirty Kinky
Stories About Pain, Power, Religion,
Unicorns, & More. I bought it. I
read the first page of the
introduction, my gnarled and liverIn "Books"



(http://freelingughtblogs.com/phar (http://freelingughtblogs.com/pharyngucalf-irre-chary)

I have never been so flattered in my life. Usually the angry MGTOWs and MRAs just call me a beta cuck, but I've now discovered what they

(http://freethoughtblogs.com/pharyngula/co15/10/21/socoogonup/)

In "Miscellaneous and Meta" (http://freethoughtblogs.com/pharyngula/2015/10/21/s000000up/)
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- PZ Myers (http://freethoughtblogs.com/pharyngula/author/pharyngula/)
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### Comments

1. Ulgaa

24 September 2016 at 4:40 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041546)

Have you seen Gary Johnson's tongue debacle?

2. slithey tove (twas brillig (stevem))

24 September 2016 at 4:53 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041548)

"yeah, climate is getting warmer, man-made yada-yada-yada. so we should build more coal power plants. yes we should"

yuk yuk yuk not even wrong.

long term view does not mean Billions of year timeframe.

what a dimwit.

3. unclefrogy 24 September 2016 at 5:09 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041549)

I could not get 2 minutes into what he was saying. I take it he does not live near a sea port any where in the world. It will be really expensive to relocate all of the sea ports in the world to higher ground. I have no idea ho to even estimate what it will cost, probably considerably more than switching to alternative energy sources cou cost.

I have learned that when I start to throb and sweat profusely from exertion I am getting old and am not in the condition I was when I was in my 20's and 30's. It means it is time to take a break and maybe not try to accomplish too much all at once. And remember I am getting "payed" by the hour not by the piece . uncle frogy

4. Kreator

24 September 2016 at 5:10 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041551)

He's demanding \$1,050,000 in compensation and another \$1,050,000 in punitive damages.

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(http://freethoughtblogs.com/affinity/2016/ 12/14/zero-gravity-space-art-and-you-canbe-a-part/)

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(http://freethoughtblogs.com/pharyngula/author/pharyngula)

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(http://freethoughtblogs.com/thoughtsofcrys/2016/12/14/feeling-helpless/)

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As an atheist, what curse would you use.. (Responses)

(http://freethoughtblogs.com/deviant/2016/ 12/14/as-an-atheist-what-curse-would-youuse-responses/)

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(http://freethoughtblogs.com/deviant/author/deviant)

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(http://freethoughtblogs.com/arun/author/arunmadhavan)

To Build A Bridge Or Burn It? (http://freethoughtblogs.com/bianymeans/2 016/12/13/to-build-a-bridge-or-burn-it/) B Any Means (http://freethoughtblogs.com/bianymeans) - Published by Tray Manone (http://freethoughtblogs.com/bianymeans/author/tmanone)

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Q

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Does evolution have a purpose? (http://freethoughtblogs.com/pharyngula/20

Well, serves you right. I reckon that the *nothing* that you and your pals did to him must have been quite devastating to his bottom line.

5. Silver Fox

24 September 2016 at 5:16 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041552)

"At least I will have died like a man, with my tool in my hand!"

You have no idea how lucky you are that you didn't say that! Your wife probably would have died laughing.

6. raven

24 September 2016 at 5:22 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041553)

Gary Johnson is truly an idiot.

"Since the sun will go red giant in 2 billion years, we don't have to worry about global warming in the next century."

It's basically, we are all going to die someday so why worry about anything?

We are all going to die someday. So why bother even getting up in the morning?

For a lot of reasons. We don't own the earth. We just take care of it for the next generations, some of whom are our friends and children.

7. Paul Cowan

24 September 2016 at 5:26 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041555)

He's suing? Wow, any plans to setup some kind of GoFundMe or for legal costs? It's a model that worked well i Steven Novella I understand.

I'll contribute!

8. aaronbaker (http://www.facebook.com/profile.php?id=1360322113)

24 September 2016 at 5:28 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041556)

He's demanding \$1,050,000 in compensation and another \$1,050,000 in punitive damages.

What a schmuck. Whatever else it was, proving deductively that Jesus didn't exist was mostly harmless. Now he's graduated from abusing history to abusing the legal system—where a lot more damage can be done.

PZ Myers (http://freethoughtblogs.com/pharyngula)

24 September 2016 at 5:31 pm

(http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041558)

Yeah, we'll probably have to set up something. It involves several specific individuals, the FtB network (which, according to the suit, I totally control), the Orbit network, and Skepticon, Inc, though, so we're probably going to have to coordinate something.

It's just so ludicrous, though. He feels justified demanding a *million dollars* in lost compensation from FtB? I had no idea we paid so well!

10. EigenSprocketUK

24 September 2016 at 5:32 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041559)

Dr. Evil: "One million dollars!"

Dr Evil's lawyer: "Don't forget my fee?"

Dr. Evil: "One million and fifty thousand dollars!"

11. raven

24 September 2016 at 5:41 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041560)

16/12/14/does-evolution-have-a-purpose/)

I had no idea quantum computing was so kinky (http://freethoughtblogs.com/pharyngula/20

16/12/14/i-had-no-idea-quantum-

computing-was-so-kinky/)

If we're going to allow piano lessons, we must also allow penis-chopping (http://freethoughtblogs.com/pharyngula/20 16/12/13/if-were-going-to-allow-pianolessons-we-must-also-allow-penischopping/)

Even so-called "moderate" Republicans are unfeeling reptiles (http://freethoughtblogs.com/pharyngula/20 16/12/13/even-so-called-moderate-

Aren't you ashamed of your job? (http://freethoughtblogs.com/pharyngula/20 16/12/13/arent-you-ashamed-of-your-job/)

republicans-are-unfeeling-reptiles/)

An epistemological battering (http://freethoughtblogs.com/pharvngula/20 16/12/13/an-epistomological-battering/)

Mary's Monday Metazoan: The reindeer are

(http://freethoughtblogs.com/pharyngula/20 16/12/12/marys-monday-metazoan-thereindeer-are-suffering/)

What a wonderful endorsement! (http://freethoughtblogs.com/pharyngula/20 16/12/12/what-a-wonderful-endorsement/)

Keep your biological reductionism off us men, too

(http://freethoughtblogs.com/pharyngula/20 16/12/12/keep-your-biological-reductionismoff-us-men-too/

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(http://freethoughtblogs.com/pharyngula/2016/07his opinions.)

racism-in-america-3/)

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(http://freethoughtblogs.com/pharyngula/2016/05 art-4/)

Discuss: Through a feminist lens

through-a-feminist-lens-4/)

Discuss: Moments of Political Madness

(http://freethoughtblogs.com/pharyngula/2016/11. moments-of-political-madness-6/)

He's demanding \$1,050,000 in compensation and another \$1,050,000 in punitive damages.

No big deal.

1. I've been threatened with lawsuits so many times, I've lost count. All that happened was two guys ended up i federal court, charged with felonies.

2. I'll echo some of the above.

Set up some sort of defense fund. I've contributed to many. We've never lost one yet.

I'm in for a few bucks. And a few more if it is needed.

### I really, really don't like bullies!!!

PS The truth is an absolute defense.

PPS Carrier is an idiot. Most of us had forgotten all about him and his problems. He just reminded us again. Really, he should sue himself for being an idiot.

Hmmm, I just called him an idiot. Twice. Maybe he will sue me. I can hope anyway.

12 Loftv

> 24 September 2016 at 5:54 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041563)

Carrier seems to be all Wave and no Modulation.

Azkyroth, B\*Cos[F(u)]==Y 24 September 2016 at 6:02 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-

He's demanding \$1,050,000 in compensation and another \$1,050,000 in punitive damages.

Well, that goes a long way towards clearing him of the charge of being unethical.

14. Nerd of Redhead, Dances OM Trolls 24 September 2016 at 6:03 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041568)

Ah, the usual. He is free to express himself, anytime, anyplace, and in any situation, including criticizing you. You aren't free to criticize him at all. Somebody who doesn't truly understand free speech due to ego problems, like Trump.

Azkyroth, B\*Cos[F(u)]==Y

sentence/#comment-1041567)

24 September 2016 at 6:06 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041569)

...and predatory.

24 September 2016 at 6:17 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041572)

How is Johnson any different from any other Republican ex-governor? Just because he's running as a Libertarian doesn't cover up the basic insanity of the modern Republican party, to which he used to belong. (I'l make an exception for Jon Huntsman. In 2008, he was pretty reasonable. so far as one found out anything abo

🛂 24 September 2016 at 7:43 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041577)

(http://freethoughtblogs.com/pharyngula/2016/07Rabbit in the headlights stupid. SNL should do a skit on him, every time I see him he looks like he has no idea what he's doing, and was some how talked into running due to a bet.

Is Richard suing for defamation, or is he going the full thunderfoot? Either way I don't like his chances.

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Discuss: Music

(http://freethoughtblogs.com/pharyngula/2015/08 Image) raven

music/)

Discuss: World Politics

(http://freethoughtblogs.com/pharyngula/2015/08PZ et al./FTB's should try to get this declared a SLAPP suit. Which it is.

world-politics/)

Strategic Lawsuit Against Public Participation.

sentence/#comment-1041581)

Discuss: Interesting Stuff

Losers of SLAPP suits pay your attorney fees and court costs.

(http://freethoughtblogs.com/pharyngula/2016/11 Minnesota is an anti-SLAPP state. interesting-stuff-5/)

This will BTW, end up in federal court. Not all the accused live in the same state as Richard Carrier.

The Pharyngula Wiki

(http://pharyngula.wikia.com/wiki/Pharyngula4Wi

Social Justice and Economics

(http://pharyngula.wikia.com/wiki/Economics#S<sub>sentence</sub>/#comment-1041584)

Social Justice Llink Roundup

(http://pharyngula.wikia.com/wiki/Feminist\_link

themadtapper

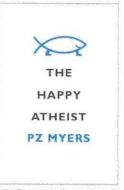
24 September 2016 at 9:26 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-

24 September 2016 at 8:40 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-

PPS Carrier is an idiot. Most of us had forgotten all about him and his problems. He just reminded us again Really, he should sue himself for being an idiot.

PZ Myers

(mailto:pzmyers@gmail.com) is a biologist and associate professor at the University of Minnesota, Morris (http://www.morris.umn.edu/). This is a personal weblog. The opinions expressed here represent my own and not those of my employer.



(http://www.powells.com/biblio/1-9780307379344-2)

- · a longer profile of yours truly (http://www.citypages.com/2005-11-23/news/the-mad-scientist/)
- · my calendar (actually updated!) (https://www.google.com/calendar/embed? src=pzmyers%40gmail.com&ctz=America/Chicago)
- · Nature Network

(http://network.nature.com/profile/pzmyers)

· facebook

(http://minnesota.facebook.com/p/PZ\_Myers/13937490)

MvSpace

(http://www.myspace.com/pharyngula)

- Twitter (http://twitter.com/pzmyers)

(http://www.atheistnexus.org/profile/PZMyers)

Pretty much this. The "compensation", I'm willing to bet, is not for supposed lost revenue from FTB, but lost revenue because he thinks the reputation hit will affect his book sales. Thing is, if he'd just left peaceably and just gone somewhere else, and just kept doing his thing, he'd have been better off. Yeah, he'd get talked bad about in some circles, but he's had plenty of defenders and I'd imagine most people who find his books for scholarly reasons won't have been digging into his past before deciding on whether or not to buy. By filing a ridiculous (and ultimately doomed) lawsuit and making a complete spectacle of himself, he's just reminding (http://freethoughtblogs.com/pharyngula/files/201everyone of the very thing he's worried people will think of when they hear his name. He really is his own wors enemy here.

24 September 2016 at 9:48 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041586)

he's just reminding everyone of the very thing he's worried people will think of when they hear his name.

1. He has forgotten the First Rule of Holes.

When you find yourself in a hole, the first thing to do is...stop digging!!!.

This is really dumb. 2. He has turned something nebulous and minor into some major issue that is going to last for years. The feder

courts are backlogged due to the GOP not letting any judge appointments through.

- 3. My knowledge of this whole situation is cursory. But from what I've seen, he is dead wrong and going to lose badly. He really doesn't have a case at all.
- 4. I'm guessing based on how flimsy his case is, that he is simply trying to bully people. A lot of the time, they hope the accused get scared and refuse to show up. This actually works a lot of the time and they get a default judgement easily. They'll keep the case going until the first day of court.

It wouldn't work on me. I've been in federal court before on high stakes IP cases. I was nervous until after the first day. It's no big deal.

The Plaintiff's pulled a bunch of pathetic tricks to try to intimidate me. It didn't work but it did make me mad.

21. raven

24 September 2016 at 10:06 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041587)

California Federal Court Update: Backlog Of Cases Reaches Crisis ...

www. ibtimes. com/ california-federal-court-update-backlo...

International Business Times

Nov 12, 2015 - Only six judges handle thousands of cases in the U.S. District Court for the Eastern District of California.

1. The federal courts are seriously backlogged.

This article called it a crisis, a year ago.

2. I don't know exactly how this translates into when a civil case filed now, gets heard.

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 the Pharyngula chat room (http://wbe001.mibbit.com/? server=irc.synirc.net&channel=%23pharyngula) (#pharyngula on irc.synirc.net)

· G

(https://plus.google.com/117447138737788378765/? prsrc=3)

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I reserve the right to publicly post, with full identifying information about the source, any email sent to me that contains threats of violence.

(http://atheism.about.com/od/ReadersChoiceAwards/ss/ Choice-Awards-2012.htm)



(http://outcampaign.org/)
I support Americans United for Separation of Church and State. (http://www.au.org)

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(http://freethoughtblogs.com/pharyngula/2016 /12/10/even-us-sacrilegious-jerks-havelimits/comment-page-1/#comment-1054273) Tethys on Even us sacrilegious jerks have limits

(http://freethoughtblogs.com/pharyngula/2016/12/10/even-us-sacrilegious-jerks-havelimits/comment-page-1/#comment-1054272) Fair Witness

(https://plus.google.com/1049452365371879 01781) on Is that in my job description? (http://freethoughtblogs.com/pharyngula/2016 /12/14/is-that-in-my-job-description/commentpage-1/#comment-1054271)

Tom Foss (http://dubitoergosum.net) on An epistemological battering

(http://freethoughtblogs.com/pharyngula/2016 /12/13/an-epistomological-

battering/comment-page-1/#comment-1054270)

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(http://freethoughtblogs.com/pharyngula/2016 /12/13/an-epistomological-

battering/comment-page-1/#comment-1054269)

gijoel on Aren't you ashamed of your job? (http://freethoughtblogs.com/pharyngula/2016 /12/13/arent-you-ashamed-of-your3. I'm guessing the wait time will be a few years.

No point in waiting up on this one. Most likely, nothing is going to happen for years.

2. Cregory in Seattle (http://www.gregory-gadow.net)

25 September 2016 at 12:58 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041595)

Regarding Carrier, didn't he leave FtB voluntarily and on his own initiative?

23. Silentbob

25 September 2016 at 4:11 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041601)

@ 22 Gregory in Seattle

He's said so himself.

I do not want FreethoughtBlogs or its mission to be compromised by having to devote resources to defending me or vetting claims or choosing sides.

[...]

I have therefore decided it's best for me to move my blog content to my own domain where I can operate independently and take all the heat myself, now and in future. Accordingly I have moved my blog here to movn website.

(Source: richardcarrier.info/archives/586)

24. Andrew G.

25 September 2016 at 4:27 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041602)

Wow, is he representing himself or did he somehow find a lawyer who has somehow missed the last 20 years of US legal history?

The magic word in this context is "47 USC 230(c)(1)", and anyone who knows anything at all about Internet la knows about this one. (It has even been relevant specifically to the skeptic movement: Stephen Barrett of Quackwatch lost a case because of it, see Barrett v. Rosenthal.)

Carrier in a comment on his own blog made it clear that he believes that a blog network is subject to the same rules regarding liability as a print newspaper; this hasn't been the case since 1996, and there's a long list of legaprecedents about it.

25.



=8)-DX

25 September 2016 at 5:01 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041603)

RIP my respect for Carrier as a human being (arrogant, entitled prat is how this makes him look) As far as I cal see he's pissed at people discussing women complaining about his flirting/inappropriate sex-talk, he's enraged anyone can call it harassment/a mistake. Which seeing as he's trying to be open and above-board poly is something he should take as an expected risk. If he cared about his reputation, he'd admit, apologise and try to do better (even if causing harm was never his intent – misunderstandings are miscommunications, intentional or not).

But his scholarly work remains interesting and worthwhile.

Giliell, professional cynic -Ilk- (http://giliellthinkingaloud.blogspot.com/)

25 September 2016 at 5:25 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041607)

I'm choosing to read that as German numbers. He's suing for 1 dollar 5 cent, which seems about right.

27. marinerachel

25 September 2016 at 6:33 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041611)

# Case: 2:16-cv-00906-MHW-EPD Doc #: 17-21 Filed: 12/22/16 Page: 7 of 10 PAGEID #: 411

job/comment-page-1/#comment-1054268) gijoel on Even so-called "moderate" Republicans are unfeeling reptiles (http://freethoughtblogs.com/pharyngula/2016 /12/13/even-so-called-moderate-republicansare-unfeeling-reptiles/comment-page-1/#comment-1054267) gijoel on Even so-called "moderate" Republicans are unfeeling reptiles (http://freethoughtblogs.com/pharyngula/2016 /12/13/even-so-called-moderate-republicansare-unfeeling-reptiles/comment-page-1/#comment-1054266) tardigrada on Even so-called "moderate" Republicans are unfeeling reptiles (http://freethoughtblogs.com/pharyngula/2016 /12/13/even-so-called-moderate-republicansare-unfeeling-reptiles/comment-page-1/#comment-1054265)

gijoel on I had no idea quantum computing was so kinky

(http://freethoughtblogs.com/pharyngula/2016 /12/14/i-had-no-idea-quantum-computingwas-so-kinky/comment-page-1/#comment-1054264)

John Morales on Even us sacrilegious jerks have limits

(http://freethoughtblogs.com/pharyngula/2016/12/10/even-us-sacrilegious-jerks-have-limits/comment-page-1/#comment-1054263) gijoel on Is that in my job description? (http://freethoughtblogs.com/pharyngula/2016/12/14/is-that-in-my-job-description/comment-page-1/#comment-1054262)

John Morales on Is that in my job description?

(http://freethoughtblogs.com/pharyngula/2016 /12/14/is-that-in-my-job-description/commentpage-1/#comment-1054261)

loop on Is that in my job description? (http://freethoughtblogs.com/pharyngula/2016 /12/14/is-that-in-my-job-description/commentpage-1/#comment-1054260)

Lynna, OM

(http://www.artmeetsadventure.com) on Discuss: Moments of Political Madness (http://freethoughtblogs.com/pharyngula/2016/11/05/discuss-moments-of-political-madness-6/comment-page-3/#comment-1054259)

### **ATHEISM**

American Atheists (http://www.atheists.org/)
American Humanist Association
(http://www.americanhumanist.org/)
Atheist Alliance International
(http://www.atheistalliance.org/)
Canadian Atheist
(http://canadianatheist.com/)
Daylight Atheism
(http://www.patheos.com/blogs/daylightatheism/)
Ex-Muslims of North America
(http://www.exmna.org/)
Free Thinking

What a fucking child.

Johnson is just a boob. Glad his chances of a presidency are less than zero.

· W

Marcus Ranum (http://www.ranum.com)

25 September 2016 at 9:17 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041623)

he thinks the reputation hit will affect his book sales.

That's bestseller territory. Carrier's in no danger of losing that kind of money from his books.

9. SC (Salty Current) (http://saltycurrent.blogspot.com)

25 September 2016 at 9:31 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041624)

But his scholarly work remains interesting and worthwhile.

Just one note because it was something that annoyed me: I read  $Proving\ History: Bayes's\ Theorem\ and\ the\ Quest\ for\ the\ Historical\ Jesus\ when\ it\ came\ out.\ It\ was\ interesting.\ But-I\ didn't\ become\ aware\ until\ after\ I'd\ purchased\ it\ that\ it\ was\ essentially\ the\ first\ part\ of\ an\ argument\ about\ Jesus\ that\ he\ would\ continue\ in\ another\ (and\ more\ expensive)\ book.\ That\ should\ have\ been\ made\ plain\ in\ the\ book's\ description\ itself;\ better\ yet,\ it\ should\ have\ been\ one\ book.\ Proving\ History\ had\ far\ too\ much\ about\ Bayes'\ Theorem\ in\ general\ and\ far\ too\ litt\ about\ its\ application\ to\ the\ existence\ of\ Jesus.\ I\ haven't\ read,\ and\ won't\ read,\ On\ the\ Historicity\ of\ Jesus\ becau\ I\ was\ and\ remain\ thoroughly\ ticked\ off\ by\ the\ bait\ and\ switch,\ which\ has\ no\ place\ in\ scholarly\ publishing.$ 

Marcus Ranum (http://www.ranum.com)
 25 September 2016 at 10:19 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041630)

Lofty@#12: Clever signal!

31. Rob Grigjanis

25 September 2016 at 11:30 am (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041637)

SC @29: I've read a few reviews of that book by mathematicians, and they all seem to be rather critical of his u of Bayes' Theorem, even ones who are sympathetic to his views (https://irrco.wordpress.com/2012/09/08/a-mathematical-review-of-proving-history-by-richard-carrier/);

I can't help but think that Carrier is using Bayes's Theorem in much the same way that apologists such as William Lane Craig use it: to give their arguments a veneer of scientific rigour that they hope cannot be challenged by their generally more math-phobic peers.

32. themadtapper

25 September 2016 at 1:37 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041656)

That's bestseller territory. Carrier's in no danger of losing that kind of money from his books.

To be sure. But that's the whole point of the suit anyway, to start with a ridiculous sum and hope to bully the other parties into settling for less. His argument will be that he is losing or will lose book revenue, but his goal probably to NOT have to defend that in court. When he does have to though, he's going to like how it ends.

33. themadtapper

25 September 2016 at 1:39 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-of-sentence/#comment-1041657)

He's NOT going to like how it ends. Dammit, still too tired to type.

Beatrice, an amateur cynic looking for a happy thought

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(http://www.centerforinguiry.net/blogs) Jesus and Mo (http://www.jesusandmo.net/) Minnesota Atheists (http://mnatheists.org/) Rosa Rubicondior (http://rosarubicondior.blogspot.com) Sandwalk (http://sandwalk.blogspot.com/) SSA (https://www.secularstudents.org/) The Morning Heresy (http://www.centerforinquiry.net/blogs/pfidalgo

### CULTURE

Alas! A blog (http://www.amptoons.com/blog/) Amanda Marcotte (http://www.salon.com/writer/amanda\_marcot Americans United (http://au.org/) Blue Gal (http://bgalrstate.blogspot.com/) Butterflies & Wheels (http://www.butterfliesandwheels.org/)

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(http://nielsenhayden.com/makinglight/) Rewire (https://rewire.news/)

Sadly, No! (http://www.sadlyno.com/) Secular Woman

(http://www.secularwoman.org/) Skentical Humanities

(http://skepticalhumanities.com/)

We Hunted the Mammoth

(http://wehuntedthemammoth.com/) Whatever (http://whatever.scalzi.com/)

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(http://www.preposterousuniverse.com/blog/)

Sandwalk (http://sandwalk.blogspot.com/) SciAm blogs

(http://blogs.scientificamerican.com/)

Scicurious

(https://www.sciencenews.org/blog/scicurious

Science after Sunclipse (http://www.sunclipse.org/)



25 September 2016 at 1:42 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041658)

### themadtapper

To be sure. But that's the whole point of the suit anyway, to start with a ridiculous sum and hope to bully the other parties into settling for less.

Just another way US let's-settle-that-in-court culture is maddening. There is not sense of justice or respect for the legal system in that, it's just using the legal system to bully and harass people.

Golgafrinchan Captain 35.

> 25 September 2016 at 1:55 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041659)

It seems to me that Carrier's approach may be an attempt at a Streisand-Trump PR move.

anthrosciguy

25 September 2016 at 2:04 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041660)

I clicked on the Johnson video but then decided I really didn't want to listen to him being stupid again, and started watching it with the sound off. His doofus act is even more effective when you just look at his facial and body movements. Try it.

 Michael B. Conway (https://plus.google.com/117059889305233110333) 25 September 2016 at 2:30 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041666)

You should have said, "At least I will have died in your arms."

38. mostlymarvelous

25 September 2016 at 2:32 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041667)

whheydt

I'll make an exception for Jon Huntsman. In 2008, he was pretty reasonable.

Bob Inglis was also outstanding (until he was knocked out of selection by a tea-partier).

39. jrkrideau

> 25 September 2016 at 2:42 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041669)

@31 Rob Grigjanis

I never have gotten a real feel for Bayesian statistics-but I'm still working on it!

However my first thought when reading about Carrier using Bayes Theorem was the thought that Bayes Theorem is history's new Quantum "whatsit" in medical woo.

That review seems to support me. Thanks

\$25 September 2016 at 3:13 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041673)

"Since the sun will go red giant in 2 billion years, we don't have to worry about global warming in the next century."

Not sure that's a real quote?

Snopes (http://www.snopes.com/gary-johnson-forget-global-warming/) rates the 2011 press club luncheon Mostly True, but gives a very different quote:

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ScienceBlogs (http://scienceblogs.com/) Scientopia (http://scientopia.org/blogs/) Skulls in the Stars

(http://skullsinthestars.com/)

Telliamed Revisited

(http://telliamedrevisited.wordpress.com/)

The Well-Timed Period

(http://thewelltimedperiod.blogspot.com/)

What's in John's Freezer? (http://whatsinjohnsfreezer.com/)

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Skepchick (http://skepchick.org/) Skeptical Humanities (http://skepticalhumanities.com/)

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(http://freethoughtblogs.com/p

## sexism/) apophenia

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back in the gutter

(http://freethoughtblogs.com/pharyngula/tag/back-in-the-

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mindedness/) blue tongued lizard

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movies/) courage

(http://freethoughtblogs.com/pharyngula/lag/courage/)

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2/) critiquing feminism

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ask me about mine

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## Gender workshop

Leave a Reply

(http://freethoughtblogs.com/pharyngula/tag/gender-

WHAT'S TRUE: Gary Johnson said during a 2011 press club luncheon that global warming is in our future' and 'the sun is going to actually grow and encompass the Earth.'

WHAT'S FALSE: Johnson criticized proposed spending on global warming as a largely ineffective waste of money, but he didn't literally say that we should do nothing about global warming because the sun will eventually envelop the Earth anyway.

It gives the quote, in context, as (all emboldening in the original):

Well, climate change - I think the world is getting warmer. I think that it's man-caused. That said, should we be engaged in cap and trade taxation? No. I don't think that we should. We should lend certainty to the energy field. We should be building new coal-fired plants. When you look at the amount of money that we'r looking to spend on global warming, in the trillions, and look at the result, I just argue that the result is completely inconsequential to the money that we would end up spending, and that we could direct those monies in other ways that would be much more beneficial to mankind.

We have a long-term view. Should we take the long-term view when it comes to global warming I think that we should. And the long-term view is that in billions of years, the sun is going to actually grow and encompass the Earth, right. So global warming is in our future.

Snopes points out he is acknowledging AGW, and after some additional analysis concludes he seems to think spending money on AGW is pointless. He certainly does not seem to get it; e.g., that silliness about building ne GHG generators ("building new coal-fired"). (I myself also detect hints that he may think AGW is, with apologies to Douglas Adams, "mostly harmless".)

Rob Grigjanis

25 September 2016 at 5:01 pm (http://freethoughtblogs.com/pharyngula/2016/09/24/commutation-ofsentence/#comment-1041700)

jrkrideau @39: My own way of coming to grips with Bayes' Theorem back in the day was to draw pictures. No idea if this will help you or anyone else, or if I'm telling anyone anything they don't already know, but what the heck...

Draw a circle to represent the entire population. We'll call the area of that circle 1 unit, so that areas correspond to overall probabilities. Within that, draw a circle to represent people with red hair; call that area A. Draw another circle to represent people with blue eyes; call that area B. Those last two circles will overlap, because some people have both red hair and blue eyes. So we have four distinct regions;

- 1) The one excluding all people with either red hair or blue eyes. Call this area w.
- 2) The one with red-haired people without blue eyes; that's A excluding the overlap with B. Call this area x.
- 3) The one with blue-eyed people without red hair; that's B excluding the overlap with A. Call this area y.
- 4) The overlap between A and B, which has people who have both red hair and blue eyes. Call this area z.

The probability of finding someone with red hair is P(A)=x+z

The probability of finding someone with blue eyes is P(B)=v+z

The probability that you will find someone with blue eyes among people with red hair is the conditional probability P(B|A), and that is the area of the overlap divided by the area A;

P(B|A) = z/(x+z)

You can see right away that

P(B|A)P(A) = P(A|B)P(B) = z

P(A|B) = P(B|A)P(A)/P(B)

So, assuming P(B) isn't zero, we can write

 $(http://free thought blogs.com/pharyngul \emph{$\epsilon_{The}$ probability that you will find someone with red hair $among$ people with blue eyes is the conditional probability that you will find someone with red hair $among$ people with blue eyes is the conditional probability that you will find someone with red hair $among$ people with blue eyes is the conditional probability that you will find someone with red hair $among$ people with blue eyes is the conditional probability that you will find someone with red hair $among$ people with blue eyes is the conditional probability that you will find someone with red hair $among$ people with blue eyes is the conditional probability that you will find someone with red hair $among$ people with blue eyes is the conditional probability that you will find someone with red hair $among$ people with blue eyes is the conditional probability that you will be a supplication of the pr$ probability P(A|B), and that is the area of the overlap divided by the area B;

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### workshop/) god's weird dicktates

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more-bats/1 NO

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The Fermi paradox is only interesting for the assumption exposes (http://freethoughtblogs.com/pharyngula/2016/12/02/tl fermi-paradox-is-only-interesting-for-the-assumptions-it-expose

## Watching the legal sausage getting made

You may know that Freethoughtblogs, The Orbit, and Skepticon have taken on a lawyer to defend us against a lawsuit for over *two million dollars* by Richard Carrier. Weirdly, this suit was filed in Ohio, where none of the targets live, and where most of the conflicts did not occur, and our lawyer's first tactic is to file for a change of venu This is a public filing, so you can read it yourself (pdf)

(http://freethoughtblogs.com/pharyngula/files/2016/12/latestllfiling.pdf).

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In "Weirdness'

cephalopod-ever-have-one-ofthose-days-where-you-have-atough-time-telling-where-your-

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Friday Cephalopod: Ever have one of those days where you have a tough time telling where your food ends and you

(http://freethoughtblogs.com/pharyngula/2015/11/27/fridaycephalopod-ever-have-one-of-thosedays-where-you-have-a-tough-time-

telling-where-your-food-ends-and-youbegin/)

In "Science"

« Try telling Ray Comfort that (http://freethoughtblogs.com/pharyngula/2016/12/02/try-tellingray-comfort-that/)

The song is a little bit naughty, so

non-nerds might hear it.

the-hummonite/) Behold the Hummonite! (http://freethoughtblogs.com/pharyngula/2013/02/26/behold-

> Affidavit Exhibit U

The Fermi paradox is only interesting for the assumption exposes (http://freethoughtblogs.com/pharyngula/2016/12/02/tł fermi-paradox-is-only-interesting-for-the-assumptions-it-expose

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Rally in New York (http://freethoughtblogs.com/resist/2016/1 2/14/rally-in-new-york/) PREETHOUGHT RESISTANCE

(http://freethoughtblogs.com/resist) - Published by PZ Myers (http://freethoughtblogs.com/resist/author/pharyngula)

- & PZ Myers (http://freethoughtblogs.com/pharyngula/author/pharyngula/)
- # 2 December 2016
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#### Comments

1. birgerjohansson

2 December 2016 at 6:26 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052239)

Is this one of those nuisance lawsuits where a bastard sues people hoping they will settle out of court to make t troll go away, or is this a deluded kook?

Moar bad stuff.

Andrew Sachs, Manuel from Fawlty Towers, dies aged 86

https://www.theguardian.com/media/2016/dec/o1/andrew-sachs-dies-after-alzheimers-aged-86 (https://www.theguardian.com/media/2016/dec/o1/andrew-sachs-dies-after-alzheimers-aged-86) (https://www.theguardian.com/media/2016/dec/o1/andrew-sachs-dies-aged-86) (https://www.theguardian.com/media/2016/dec/o1/andrew-sachs-d

-I know, 2016 only looks bad because of statistical flukes, but FUUUCK !!!

2. Ichthyic

2 December 2016 at 6:33 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052240)

Neither. Richard was a big part of the blog system here and elsewhere for a long time.

more's the pity.

he's no grandstander like TFoot, nor a kook like Pivar.

He says he's doing this because he has to in order to clear his name.

I have no dog in this hunt, so happy to let the courts decide what's what, but even Carrier admits the core of all this was a mistake he made so....

3. EigenSprocketUK

2 December 2016 at 6:48 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052244)

Page 12:

Ohio is hardly known as the nerve center of polyamorous atheistic speaking and publishing.

It is now....

4. slithey tove (twas brillig (stevem))
2 December 2016 at 7:08 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052250)

Re Sachs:



5. KG

2 December 2016 at 7:14 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052251)

or is this a deluded kook? - birgirjohansson

Yes, although one who was hosted at FtB for far too long. Not only a mythicist (the main form of deluded kookery popular among non-MRA atheists), but someone whothinks all historical methodology can be reduced to Bayes's theorem, and for some years thought he correct theoretical physicists about the relationship between quantum mechanics and relativity.

Zero Gravity Space Art, And You Can Be A

(http://freethoughtblogs.com/affinity/2016/ 12/14/zero-gravity-space-art-and-you-canbe-a-part/)

Affinity (http://freethoughtblogs.com/affinity) - Published by Caine (http://freethoughtblogs.com/affinity/author/caine)

Is that in my job description? (http://freethoughtblogs.com/pharynguia/2 016/12/14/is-that-in-my-job-description/) Pharynguia (http://freethoughtblogs.com/pharynguia) -Published by PZ Myers

(http://freethoughtblogs.com/pharyngula/author/pharyngula)

THE PARADOX OF SCIENCE: The surprising success of science (http://freethoughtblogs.com/singham/2016/12/14/the-paradox-of-science-the-surprising-success-of-science/) Mano Singham (http://freethoughtblogs.com/singham)-Published by Mano Singham (http://freethoughtblogs.com/singham/author/singham)

Feeling Helpless

(http://freethoughtblogs.com/thoughtsofcry s/2016/12/14/feeling-helpless/) Thoughts of Crys (http://freethoughtblogs.com/thoughtsofcrys)

Published by thoughtsolarys (http://reethoughtblogs.com/thoughtsolarys/author/thoughtsolar

Quoting Jordan Peterson is "muckraking" now

(http://freethoughtblogs.com/atg/2016/12/ 14/quoting-jordan-peterson-is-muckrakingnow/)

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As an atheist, what curse would you use... (Responses)

(http://freethoughtblogs.com/deviant/2016/ 12/14/as-an-atheist-what-curse-would-youuse-responses/)

Small Town Deviant (http://freethoughtblogs.com/deviant) Published by Cadyn

(http://freethoughtblogs.com/deviant/author/deviant)

The Indian demonetisation fiasco (http://freethoughtblogs.com/arun/2016/12/13/the-indian-demonetisation-fiasco/)
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roles le ...

Q

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6. Lofty

2 December 2016 at 7:24 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052252)

Maybe he's trying to gain enough as shole cred to land a job with the Orange Trumpeter.

7. themadtapper

2 December 2016 at 8:52 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052254)

Out of curiosity, does anybody know if Ohio has a history of leaning in favor of plaintiffs in liable/slander/defamation cases? My gut tells me the choice of venue was probably strategic.

8. Kongstad

2 December 2016 at 9:02 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052257)

If anyones interested, Atheistically Speaking podcast had a lawyer on discussing this case: http://atheisticallyspeaking.com/as280-richard-carriers-lawsuit-andrew-torrez/ (http://atheisticallyspeaking.com/as280-richard-carriers-lawsuit-andrew-torrez/)

Interesting listen

9. Kyle Garrison (https://plus.google.com/114570731718378413448)

2 December 2016 at 9:12 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legalsausage-getting-made/#comment-1052259)

@7 I think the reason is a bit less sinister than that. Carrier's last few posts before this ordeal were abo his recent move to Ohio.

10. PZ Myers (http://freethoughtblogs.com/pharyngula)

2 December 2016 at 9:15 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-

(http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052261)

Yeah, Ohio lacks any anti-SLAPP laws, while California has strong ones, and Minnesota and Missouri have some weak ones (although more potent than Ohio's). See **this map** (http://www.anti-slapp.org/your-states-free-speech-protection/).

11. Holms

2 December 2016 at 9:32 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052265)

KG, I have seen that disagreing-with-physicists-about-physics thing before, but never managed to find it (or I have simply forgotten). Do you recall where it is?

12. themadtapper

2 December 2016 at 9:50 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052270)

@9 I didn't say his move to Ohio was strategic, only the choice of venue is. He very well could have been planning to move to Ohio before the lawsuit ever became an idea. But even after the move, a competent lawyer could have told him Ohio was not the right venue for the lawsuit and would almost surely be challenged. But with Ohio having no anti-SLAPP laws, as PZ just confirmed, they would have a strong motivation to give it a transway.

13. Sport joeschoeler

2 December 2016 at 10:02 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052273)

## Case: 2:16-cv-00906-MHW-EPD Doc #: 17-22 Filed: 12/22/16 Page: 4 of 13 PAGEID #: 418

16/12/14/does-evolution-have-a-purpose/)

I had no idea quantum computing was so kinky

(http://freethoughtblogs.com/pharyngula/20 16/12/14/i-had-no-idea-quantumcomputing-was-so-kinky/)

If we're going to allow piano lessons, we must also allow penis-chopping (http://freethoughtblogs.com/pharyngula/20 16/12/13/if-were-going-to-allow-pianolessons-we-must-also-allow-penischopping/)

Even so-called "moderate" Republicans are unfeeling reptiles

(http://freethoughtblogs.com/pharyngula/20) 16/12/13/even-so-called-moderaterepublicans-are-unfeeling-reptiles/)

Aren't you ashamed of your job? (http://freethoughtblogs.com/pharyngula/20 16/12/13/arent-you-ashamed-of-your-job/)

An epistemological battering (http://freethoughtblogs.com/pharyngula/20) 16/12/13/an-epistomological-battering/)

Mary's Monday Metazoan: The reindeer are

(http://freethoughtblogs.com/pharyngula/20 16/12/12/marys-monday-metazoan-thereindeer-are-suffering/)

What a wonderful endorsement! (http://freethoughtblogs.com/pharyngula/20 16/12/12/what-a-wonderful-endorsement/\

Keep your biological reductionism off us men, too

(http://freethoughtblogs.com/pharyngula/20 16/12/12/keep-vour-biological-reductionismoff-us-men-too/)

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through-a-feminist-lens-4/)

Discuss: Moments of Political Madness

(http://freethoughtblogs.com/pharyngula/2016/11.sausage-getting-made/#comment-1052300)

moments-of-political-madness-6/)

Holms: Carrier is a historian with an actual history degree, so I don't think you can say he's arguing outside of his field. He's written a couple books about his unorthodox views on whether Jesus existed, debates, and many blog posts. I haven't read the books, but I would occasionally read the blog posts when he blogged here, and I s now that he's still actively blogging at http://www.richardcarrier.info (http://www.richardcarrier.info).

themadtapper 🖈

2 December 2016 at 10:32 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052281)

@8 That's an excellent podcast. Really does a good job explaining the tort law involved. Also, after hearing the things he has to say about Ohio's defamation laws and standards, I'd say its almost certain that the Ohio venue was chosen strategically. One of the counts in his lawsuit isn't even recognized as valid in some states, but is recognized in Ohio.

15. Siggy (http://freethoughtblogs.com/atrivialknot)

2 December 2016 at 10:58 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052287)

I didn't know Carrier had moved to Ohio. This whole time, I had been imagining great tension at the Bay Area meetups between Richard Carrier and Greta Christina.

Owlmirror |

2 December 2016 at 11:04 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052288)

@KG:

Not only a mythicist (the main form of deluded kookery popular among non-MRA atheists)

I'm unconvinced that mythicism is either deluded (as in, an actual false belief) or kookery (as in, obviously absurd or based on obviously garbage premises). Carrier has at least made the case that:

- (a) It's very odd that Paul of Tarsus, who supposedly lived not long after Jesus Christ was supposedly crucified. wrote nothing that invoked any miracles that Jesus performed (other than the resurrection itself) or teachings that Jesus taught.
- (b) The Gospels on the one hand seem to build on one another, and yet all too often contradict each other. The are also events in the Gospels that only make sense as allegories. It's therefore reasonable to reject them as having any reliability about an actual life of an actual person doing actual things.

There's more to the argument than that, of course, but I think that's more or less the basics.

There was something very odd going on with the beginnings of Christianity, and mythicism is not the oddest conclusion to come to given that weirdness.

Do you know of any reason to think that what Carrier points out about the writings of Paul or the Gospels is false?

ahcuah (http://ahcuah.wordpress.com/)

2 December 2016 at 11:27 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052292)

I'm impressed. One of the attorneys is noted First Amendment attorney Marc Randazza.

PZ Myers (http://freethoughtblogs.com/pharyngula)

2 December 2016 at 11:43 am

(http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-gettingmade/#comment-1052298)

Randazza is a hoot. We've had a couple of conference calls with him.

Brian Pansky (http://thread-of-fire.tumblr.com/myblogs)

2 December 2016 at 11:46 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal

@5, KG

## Case: 2:16-cv-00906-MHW-EPD Doc #: 17-22 Filed: 12/22/16 Page: 5 of 13 PAGEID #: 419

Discuss: Music

(http://freethoughtblogs.com/pharyngula/2015/08

music/)

Discuss: World Politics

world-politics/)

Discuss: Interesting Stuff

(http://freethoughtblogs.com/pharyngula/2016/11

interesting-stuff-5/)

The Pharyngula Wiki

 $(http://pharyngula.wikia.com/wiki/Pharyngula\_Wi_{Note that \ Bayes \ Theorem \ basically \ is just logic applied to \ data/premises. So it shouldn't be surprising that \ data/premises. The shouldn't be surprising that \ data/premises of \ data/premises of$ Social Justice and Economics

(http://pharyngula.wikia.com/wiki/Economics#

Social Justice Llink Roundup

(http://pharyngula.wikia.com/wiki/Feminist\_link)

You presented no arguments that he's wrong.

Not only a mythicist (the main form of deluded kookery popular among non-MRA atheists),

He actually debunks bad Mythicist memes that are popular. He's against the kooks. His book on the subject is peer reviewed. He admits Jesus could have a 1 in 3 chance of being historically based.

but someone whothinks all historical methodology can be reduced to Bayes's theorem

If you want to see the case made (for all science, not just history) by someone other than Carrier:

https://www.amazon.ca/Our-Knowledge-Past-Philosophy-Historiography/dp/0521120772

(https://www.amazon.ca/Our-Knowledge-Past-Philosophy-Historiography/dp/0521120772)

correct reasoning is just like that.

, and for some years thought he correct theoretical physicists about the relationship between quantum mechanics and relativity.

@11, Holms

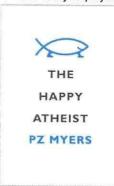
KG, I have seen that disagreing-with-physicists-about-physics thing before, but never managed to find it (o I have simply forgotten). Do you recall where it is?

Seems misleading to say "disagreing-with-physicists-about-physics", since these are not settled questions with physics. Hence why KG had to say "theoretical physicists". So they are still in the domain of philosophy, which one of Carrier's areas of specialty. And he's also well informed of the confirmed physics of relativity and

(http://freethoughtblogs.com/pharyngula/files/201quantum mechanics.

PZ Myers

(mailto:pzmyers@gmail.com) is a biologist and associate professor at the University of Minnesota, Morris (http://www.morris.umn.edu/). This is a personal weblog. The opinions expressed here represent my own and not those of my employer.



(http://www.powells.com/biblio/1-9780307379344-2)

- · a longer profile of yours truly (http://www.citypages.com/2005-11-23/news/the-mad-scientist/)
- · my calendar (actually updated!) (https://www.google.com/calendar/embed? src=pzmyers%40gmail.com&ctz=America/Chicago)
- · Nature Network

(http://network.nature.com/profile/pzmyers)

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MySpace

(http://www.myspace.com/pharyngula)

- Twitter (http://twitter.com/pzmyers)
- Atheist Nexus

(http://www.atheistnexus.org/profile/PZMyers)

Here's his paper he made (http://richardcarrier.blogspot.ca/2011/06/calling-all-physicists.html) for physicists to check out. He's said he's to busy with other things now to really reply to some of the responses he got, but he like to in the future.

20 Rob Grigjanis

> 2 December 2016 at 12:00 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052304)

> Holms @11: A couple of Profound Conclusions that Carrier came to after apparently skimming some physics;

- 1) The universe is deterministic because photons follow null geodesics (http://physics.stackexchange.com/questions/188859/what-is-a-null-geodesic/188865#188865).
- 2) Spacetime is discrete because there is a minimum resolvable distance/time.

Whether or not the universe is deterministic, or spacetime is discrete (please note, Brian Pansky), both of Carrier's arguments here are utter nonsense.

2 December 2016 at 12:01 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052305)

IANAL, but one of the glaring flaws with Carrier's lawsuit is that he lumped a whole lot of people together. Who don't know each other and have nothing in common.

It's a completely arbitrary and random grouping with only one thing in common.

Richard Carrier doesn't like them.

I'm just guessing here, but since this isn't a coherent group of people, the individuals and organizations involve could and should move to have Carrier file individual lawsuits for each defendant.

2 December 2016 at 12:10 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal (http://minnesota.facebook.com/p/PZ\_Myers/13937490) sausage-getting-made/#comment-1052307)

Get it declared a SLAPP suit.

Which it is.

Loser pays court costs and your attorney.

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• the Pharyngula chat room (http://wbe001.mibbit.com/? server=irc.synirc.net&channel=%23pharyngula) (#pharyngula on irc.synirc.net)



(https://plus.google.com/117447138737788378765/? prsrc=3)

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(http://freethoughtblogs.com/pharyngula/2016 /12/13/an-epistomological-

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(http://freethoughtblogs.com/pharyngula/2016 /12/13/an-epistomological-

battering/comment-page-1/#comment-1054269)

gijoel on Aren't you ashamed of your job? (http://freethoughtblogs.com/pharyngula/2016 /12/13/arent-you-ashamed-of-your1. Carrier is being cosmically dumb.

In the age of Trump, New American Fascists, and the internet, everyone would forget about this tempest and move on and soon. His 15 minutes of notoriety would be over and done with.

Or he could have just shown some ability for introspection, made a public apology, and attended classes in how to be a decent human being.

- 2. If Freethoughtblogs wants to set up a legal defense fund, I'm in for a few bucks. I really don't like bullies and really do value our freedoms such as free speech.
- 3. Another problem with this lawsuit. Because of the GOP, the federal courts are underfunded. The wait for a hearing in a civil suit depends on jurisdiction. But it is usually around 2 to 4 years minimum and can be as long as 10 years.

When the average attention span is 15 minutes these days, no one is going to know or care about any of this in ; years.

23. themadtapper

2 December 2016 at 12:23 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052311)

@22 They can't get it declared SLAPP in Ohio. That's likely one of the reasons Carrier and his lawyer chose it a the venue. PZ and co.'s lawyer has challenged the venue, so we'll see where that goes. Seems like they've got a solid argument for Ohio being inappropriate venue. Carrier's lawyer's whole argument for Ohio seems to be "Carrier has lived in Ohio for a few months".

4. Brian Pansky (http://thread-of-fire.tumblr.com/myblogs)

2 December 2016 at 12:39 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052316)

@20, Rob Grigjanis

2) Spacetime is discrete because there is a minimum resolvable distance/time.

You are misrepresenting him. He explicitly said (http://www.richardcarrier.info/archives/8979#comment-13816) this is not the reason. The reason has to do with *why* the minimum resolvable distance/time comes about, not the mere fact that there is a minimum resolvable distance/time.

You need to stop this.

I can't evaluate your other claim, but I doubt you have anything worth my time.

25. Brian Pansky (http://thread-of-fire.tumblr.com/myblogs)

2 December 2016 at 12:46 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052322)

@21, raven

It's a completely arbitrary and random grouping with only one thing in common.

Richard Carrier doesn't like them.

If you don't know what they have in common, then you literally don't know what this legal case is about.

6. Rob Grigjanis

2 December 2016 at 12:57 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052330)

Brian Pansky @24: I already addressed that useless deflection here

(http://freethoughtblogs.com/pharyngula/2016/02/26/im-gonna-call-this-nyesplaining/#comment-1004332 and your response was just petulant blustering.

Seriously, how do you know that Carrier is "well informed of the confirmed physics of relativity and quantum mechanics"? Because he says he is?

27. Peter Bollwerk

2 December 2016 at 1:07 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052333)

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job/comment-page-1/#comment-1054268) gijoel on Even so-called "moderate" Republicans are unfeeling reptiles (http://freethoughtblogs.com/pharyngula/2016 /12/13/even-so-called-moderate-republicansare-unfeeling-reptiles/comment-page-1/#comment-1054267) gijoel on Even so-called "moderate" Republicans are unfeeling reptiles (http://freethoughtblogs.com/pharyngula/2016 /12/13/even-so-called-moderate-republicansare-unfeeling-reptiles/comment-page 1/#comment-1054266) tardigrada on Even so-called "moderate" Republicans are unfeeling reptiles (http://freethoughtblogs.com/pharyngula/2016 /12/13/even-so-called-moderate-republicansare-unfeeling-reptiles/comment-page-1/#comment-1054265) gijoel on I had no idea quantum computing

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was-so-kinky/comment-page-1/#comment-1054264)

John Morales on Even us sacrilegious jerks have limits

(http://freethoughtblogs.com/pharyngula/2016/12/10/even-us-sacrilegious-jerks-have-limits/comment-page-1/#comment-1054263) gijoel on Is that in my job description? (http://freethoughtblogs.com/pharyngula/2016/12/14/is-that-in-my-job-description/comment-page-1/#comment-1054262)

John Morales on Is that in my job description?

(http://freethoughtblogs.com/pharyngula/2016/12/14/is-that-in-my-job-description/comment-page-1///comment-1054261)
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(http://freethoughtblogs.com/pharyngula/2016

(http://freethoughtblogs.com/pharyngula/2016/ /12/14/is-that-in-my-job-description/commentpage-1/#comment-1054260)

Lynna, OM

(http://www.artmeetsadventure.com) on Discuss: Moments of Political Madness (http://freethoughtblogs.com/pharyngula/2016 /11/05/discuss-moments-of-politicalmadness-6/comment-page-3/#comment-1054259)

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Canadian Atheist
(http://canadianatheist.com/)
Daylight Atheism
(http://www.patheos.com/blogs/daylightatheism/)
Ex-Muslims of North America
(http://www.exmna.org/)
Free Thinking

I think I'm equally disappointed at the lawsuit as I am with those who seem eager to disparage his work. I have no idea what actually happened, but a \$2m lawsuit seems awfully excessive. But that doesn't change my view that this his work in the field of history is excellent.

28. rave

2 December 2016 at 1:12 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052335)

If you don't know what they have in common, then you literally don't know what this legal case is about.

I did some reading months ago.

It didn't make things much clearer.

Richard Carrier is alleged to be something of a sexual aggressor or harasser towards a few (or many) women.

But do feel free to enlighten us. What do they have in common?

29. raven

2 December 2016 at 1:21 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052336)

#### Friendly Atheists:

has filed a lawsuit against multiple atheists, their blogging networks, and an atheist conference on charges of defamation (two counts), interference with his business (one count), and emotional distress (two counts

This doesn't look like a coherent group of closely connected people.

They shouldn't be lumped together in the same lawsuit.

OK Brian. Balls in your court. How are these people connected and why should they be lumped together?

. Sa

2 December 2016 at 1:27 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052338)

Lofty, #6

Maybe he's trying to gain enough as shole cred to land a job with the Orange Trumpeter.

Wrong Carrier.

31. Siggy (http://freethoughtblogs.com/atrivialknot)

2 December 2016 at 1:34 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052343)

@Brian Pansky

I glanced at Carrier's article on relativity. He appears to make the elementary error of applying the idea of a space-time interval to space (without time). He concludes at any two points in space are adjacent, when in fact this can only apply to two points in space-time which share a light cone. All the stuff Carrier says about objective space-time is both ill-defined and unnecessary. In every respect, this resembles the work of a physics crank, yes even down to Carrier's humility about it.

Now, over the years I have seen many attempts to poison Richard Carrier's well by referring to that time he was wrong about physics. I disagree with this, because a) being wrong about physics is not some horrible crime, b) physics cranks are mostly ordinary people, and c) physics cranks primarily harm themselves. Furthermore, thi particular case appears to have happened years ago, and I don't know that Carrier pursued it any further.

That said, Carrier's ideas about physics are indefensible, and you should stop trying. If you wanted to defend Carrier, you would do better by saying that was a long time ago. I judge Carrier for his more recent actions.

Siggy (http://freethoughtblogs.com/atrivialknot)

2 December 2016 at 1:54 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052350)

## Case: 2:16-cv-00906-MHW-EPD Doc #: 17-22 Filed: 12/22/16 Page: 8 of 13 PAGEID #: 422

(http://www.centerforinquiry.net/blogs)
Jesus and Mo (http://www.jesusandmo.net/)
Minnesota Atheists (http://mnatheists.org/)
Rosa Rubicondior
(http://rosarubicondior.blogspot.com)
Sandwalk (http://sandwalk.blogspot.com/)
SSA (https://www.secularstudents.org/)
The Morning Heresy
(http://www.centerforinquiry.net/blogs/pfidalgo

#### CULTURE

Alas! A blog (http://www.amptoons.com/blog/) Amanda Marcotte (http://www.salon.com/writer/amanda\_marcot Americans United (http://au.org/) Blue Gal (http://bgalrstate.blogspot.com/) Butterflies & Wheels (http://www.butterfliesandwheels.org/) Charles P. Pierce (http://www.esquire.com/blogs/politics/) Driftglass (http://driftglass.blogspot.com/) Hullabaloo (http://digbysblog.blogspot.com/) I Blame the Patriarchy (http://blog.iblamethepatriarchy.com/) Joe. My. God. (http://www.joemygod.com/) Lance Mannion (http://lancemannion.typepad.com/) Making Light (http://nielsenhayden.com/makinglight/) Rewire (https://rewire.news/) Sadly, No! (http://www.sadlyno.com/) Secular Woman (http://www.secularwoman.org/) Skeptical Humanities (http://skepticalhumanities.com/) We Hunted the Mammoth (http://wehuntedthemammoth.com/) Whatever (http://whatever.scalzi.com/)

#### SCIENCE

Coyot.es Network (http://coyot.es) Coyote Crossing (http://coyot.es/crossing) Discover blogs (http://blogs.discovermagazine.com/) Genomicron (http://www.genomicron.evolverzone.com/) Judge Starling (Dan Graur) (http://judgestarling.tumblr.com/) NCSE (http://ncse.com/) Panda's Thumb (http://www.pandasthumb.org/) Preposterous Universe (http://www.preposterousuniverse.com/blog/) Sandwalk (http://sandwalk.blogspot.com/) SciAm blogs (http://blogs.scientificamerican.com/) Scicurious (https://www.sciencenews.org/blog/scicurious Science after Sunclipse

(http://www.sunclipse.org/)

On second glance, I misread Carrier's article on physics. Instead, he appears to argue that both entangled particles in the EPR paradox are connected to a single point in the past via zero-length space-time intervals. I c not think this is very coherent, and it does not change my overall assessment of Carrier's ideas about physics.

33. Siobhan

2 December 2016 at 1:57 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052351)

@raven

How are these people connected and why should they be lumped together?

What we all have in common is that we didn't automatically defer to Carrier's side of the story. That's it. Worth mil, apparently.

34. 🛊 🙀 raven

2 December 2016 at 2:04 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052357)

Wikipedia

Joinder of parties[edit]

Joinder of parties also falls into two categories: permissive joinder and compulsory joinder.

Federal Rule of Civil Procedure No. 20 addresses permissive joinder. Permissive joinder allows multiple plaintiffs to join in an action if each of their claims arise from the same transaction or occurrence, and if there is a common question of law or fact relating to all plaintiffs' claims. For example, several landowners may join together in suing a factory for environmental runoff onto their property.

Permissive joinder is also appropriate to join multiple defendants, as long as the same considerations as for joining multiple plaintiffs are met. This often occurs in lawsuits regarding faulty products; the plaintiff will sue the manufacturer of the final product and the manufacturers of any constituent parts. The court must have personal jurisdiction over every defendant joined in the action.[2]

Lumping multiple defendants together is calling joinder.

I don't see that there is enough in common to lump blog networks Orbit, Freethoughtblogs, conference Skepticon, and multiple defendants who all acted individually together.

But as I said, IANAL.

Is their a real lawyer in the house?

5. rave

2 December 2016 at 2:18 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052364)

Siobhan:

What we all have in common is that we didn't automatically defer to Carrier's side of the story. That's it. Worth 2 mil, apparently.

- I don't think that is enough to lump all the defendants, Orbit, FTB's, and Skepticon together.
   Talk to your lawyers and try to get the lawsuits separated.
- 2. I've been where you are. Many times. Don't panic.

Truth is an absolute defense.

I just tell them to shut up, file the papers, and let's go to court.

They never have, perhaps because I live in a strong anti-SLAAP state. Quite often they then just threaten to kill me instead.

I realize in this case, they have filed the papers.

themadtapper

2 December 2016 at 2:24 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052368)

## Case: 2:16-cv-00906-MHW-EPD Doc #: 17-22 Filed: 12/22/16 Page: 9 of 13 PAGEID #: 423

ScienceBlogs (http://scienceblogs.com/) Scientopia (http://scientopia.org/blogs/) Skulls in the Stars (http://skullsinthestars.com/)

Telliamed Revisited

(http://telliamedrevisited.wordpress.com/)

The Well-Timed Period

(http://thewelltimedperiod.blogspot.com/)

What's in John's Freezer?

(http://whatsinjohnsfreezer.com/)

#### SKEPTICISM

Skepchick (http://skepchick.org/) Skeptical Humanities (http://skepticalhumanities.com/)

#### TAGS

(http://freethoughtblogs.com/pharyngula/tag/aliens/)

#### anti-asshole

(http://freethoughtblogs.com/pl asshole/) anti-sexism (http://freethoughtblogs.com/p sexism/) apophenia

(http://freethoughtblogs.com/pharyngula/tag/apophenia/)

back in the gutter

(http://freethoughtblogs.com/pharyngula/tag/back-in-the-

gutter/) big guns

(http://freethoughtblogs.com/pharyngula/tag/big-guns/)

bloody-mindedness

(http://freethoughtblogs.com/pharyngula/tag/bloody-

mindedness/) blue tongued lizare

(http://freethoughtblogs.com/pharyngula/tag/blue-

tongued-lizard/\) Brexit

(http://freethoughtblogs.com/pharyngula/tag/brexit/) 39.

comic book movies

(http://freethoughtblogs.com/pharyngula/tag/comic-book-

movies/) courage

(http://freethoughtblogs.com/pharyngula/tag/courage/)

#### creationism

(http://freethoughtblogs.com/pharyngula

2/) critiquing feminism

(http://freethoughtblogs.com/pharyngula/tag/cr

feminism/) cuddly

(http://freethoughtblogs.com/pharyngula/lag/cuddly/) cute (http://freethoughtblogs.com/pharyngula/tag/cute/) don't ask me about mine

(http://freethoughtblogs.com/pharyngula/tag/dontask-me-about-mine/) envy

(http://freethoughtblogs.com/pharvngula/tag/envy/)

(http://freethoughtblogs.com/pharyngula/tag/games/)

## Gender workshop

(http://freethoughtblogs.com/

Permissive joinder allows multiple plaintiffs to join in an action if each of their claims arise from the same transaction or occurrence, and if there is a common question of law or fact relating to all plaintiffs' claims.

Permissive joinder is also appropriate to join multiple defendants, as long as the same considerations as for joining multiple plaintiffs are met.

I'd imagine the premise is that the same question of law relates (that they all defamed him in violation of the same statutes) and that the claims arise from the same occurrence (that they all defamed him for the same alleged actions). It does not matter that the organizations and people in question are not all intimately connected, nor does the claim require there to have been coordination between them. IANAL either, but that is how I read the situation.

Siobhan

🚫 2 December 2016 at 2:46 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legalsausage-getting-made/#comment-1052379)

@raven

I don't think that is enough to lump all the defendants, Orbit, FTB's, and Skepticon together. Talk to your lawyers and try to get the lawsuits separated.

Hey, I didn't say it was good logic, just that it was Carrier's logic. :P

raven

2 December 2016 at 2:53 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legalsausage-getting-made/#comment-1052381)

I'd imagine the premise is that the same question of law relates (that they all defamed him in violation of th same statutes) and that the claims arise from the same occurrence (that they all defamed him for the same alleged actions).

I'm going to disagree here.

All these cases are different in occcurrence, actions, and details.

And that should matter.

At this point, since none of us are lawyers and deeply familiar with the laws and the cases, we might just as wel leave it here.

The lawyers involved will know about joinder and have thought of this. Let's see what they do.

ahcuah (http://ahcuah.wordpress.com/)

2 December 2016 at 3:25 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legalsausage-getting-made/#comment-1052384)

Here's what the Federal Rules of Civil Procedure say:

Defendants. Persons—as well as a vessel, cargo, or other property subject to admiralty process in rem—may be joined in one action as defendants if:

- (A) any right to relief is asserted against them jointly, severally, or in the alternative with respect to or arising out of the same transaction, occurrence, or series of transactions or occurrences; and
- (B) any question of law or fact common to all defendants will arise in the action.

Weren't all the blog posts related to Carrier's behavior at Skepticon? And it seems to me that the posts could easily be a "series or transactions or occurrences". On top of that, (B) is surely satisfied, and in the interest of judicial economy one court in one suit would be quite appropriate.

But on top of that, Randazza is a really, really good lawyer. If it had made sense to separate the defendants at this time, he would have done it.

Also note that this is a motion to dismiss (in lieu of an Answer). According to Rule 21 (Misjoinder and Nonjoinder of Parties):

Misjoinder of parties is not a ground for dismissing an action.

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## workshop/) god's weird dicktates

(http://freethoughtblogs.com/pharyngula/tag/godsweird-dicktates/) jealousy

(http://freethoughtblogs.com/pharyngula/tag/jealousy/) just plain viciousness

(http://freethoughtblogs.com/pharyngula/tag/just-plain-

## viciousness/) language

## (http://freethoughtblogs.com/p learning stuff

## (http://freethoughtblogs.com/pharyngula)

## stuff/) movies

(http://freethoughtblogs.com/pharyngula/tag/movies/) needed more bats

(http://freethoughtblogs.com/pharyngula/lag/needed-

more-bats/\) NO

(http://freethoughtblogs.com/pharyngula/tag/no/) oblivious

to global impact

(http://freethoughtblogs.com/pharyngula/tag/oblivious-to-

global-impact/) outreach

(http://freethoughtblogs.com/pharyngula/tag/outreach/)

#### paradigm symposium

#### (http://freethoughtblogs.com/pharyngula

#### symposium/) principles

(http://freethoughtblogs.com/pharyngula/lag/principles/)

Ray Comfort

(http://freethoughtblogs.com/pharyngula/tag/ray-

comfort/) reptile

(http://freethoughtblogs.com/pharyngula/tag/reptile/)

sarcasm

(http://freethoughtblogs.com/pharyngula/tag/sa slimy (http://freethoughtblogs.com/pharyngula/tag/slimy/)

(http://freethoughtblogs.com/pharyngula/tag/tea/) the goddamn batman

(http://freethoughtblogs.com/pharyngula/tag/the-

goddamn-batman/) transfeminism

(http://freethoughtblogs.com/pharyngula/tag

Trump

(http://freethoughtblogs.com/pharyngula/tag/trump/) ufo

(http://freethoughtblogs.com/pharyngula/tag/ufo/) Vox Day (http://lreethoughtblogs.com/pharyngula/tag/vox-

(http://freethoughtblogs.com/pharyngula/tag/with-

## nematocysts/) world conquest

So, even if it made sense, it is still too early in the proceedings to file such a motion.

soul\_biscuit

2 December 2016 at 8:27 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legalsausage-getting-made/#comment-1052427)

Rejointer of defendants:

IAAL, though I don't practice in this area. My understanding is that judges almost never sever cases against multiple defendants because trying them together is more efficient. That the statements alleged to be defamate concern the same conduct on Carrier's part is probably enough. Though I haven't read the complaint so I don't know exactly what Carrier is alleging.

2 December 2016 at 10:24 pm

(http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-gettingmade/#comment-1052454)

- 1. I agree that Carrier's physics is flaming nonsense.
- 2. However, I agree with him on the Jesus myth stuff there is so much contradictory noise in the stories that I can easily believe that Jesus is about as real as King Arthur.
- 3. We actually do all know each other to varying degrees. Being aware of each other's existence isn't necessarily a good reason to lump us together in a lawsuit.
- 4. On the matter of whether we should be split into different suits...we will do whatever our lawyer tells us is best, and I'm not going to discuss his strategies (except where there has been a public statement). We are all of us committed to hang together, though, so even if we were split apart, we'd still be mutually supporting each other in this ludicrous suit.

We're taking the whole thing very seriously, but ultimately, I'm confident that we shall prevail.

Of course, I said that about Trump, too.

ahcuah (http://ahcuah.wordpress.com/)

2 December 2016 at 10:33 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1052457)

I have placed a copy of Carrier's Complaint (http://www.ahcuah.com/Carrier\_Complaint.pdf) on my website.

Having it be a single suit also helps the defendants, in that they don't have to hire separate attorneys, or, with a single attorney, have the same papers filed multiple times for each suit.

deepwater deepwater

3 December 2016 at 2:58 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legalsausage-getting-made/#comment-1052509)

Im a bit confused - the public document posted by PZ which I accessed at https://archive.is/fVYml (https://archive.is/fVYml) is different to the one currently on the site here?

Which is the correct document?

ahcuah (http://ahcuah.wordpress.com/)

3 December 2016 at 8:36 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legalsausage-getting-made/#comment-1052515)

## (http://freethoughtblogs.con@deepwater

## conquest/) xiaotingia

(http://freethoughtblogs.com/pharyngula/lag/xiaotingia/) ZOIZ? (http://freethoughtblogs.com/pharyngula/tag/zoiz/) The only difference I noticed was that the document linked by PZ above was 126 pages and the one on archive. was 170 pages. The extra pages on archive is are the exhibits to Trey Rothell's Declaration, which are omitted o PZ's above.

🔀 💢 3 December 2016 at 1:41 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legalsausage-getting-made/#comment-1052545)

## Case: 2:16-cv-00906-MHW-EPD Doc #: 17-22 Filed: 12/22/16 Page: 11 of 13 PAGEID #: 425

I judge Carrier's mythicism, and his belief that all historical methodology can be reduced to Bayes's theorem, to be deluded kookery because the overwhelming majority of relevant experts say so.

It's very odd that Paul of Tarsus, who supposedly lived not long after Jesus Christ was supposedly crucified wrote nothing that invoked any miracles that Jesus performed (other than the resurrection itself) or teachings that Jesus taught. - Owlmirror@16

Why is it odd? His letters are to groups of Christians about various points of procedure or doctrine on which Jesus would have had nothing to say, because they could only arise once Christianity had begun to spread. The groups had presumably already been told the miracle stories and teachings – or how would they have become Christians? But beyond that, if this was a serious issue, why wouldn't the relevant experts – who include many non-Christians – not have noticed? Are you so much cleverer than all of them?

Note that Bayes Theorem basically is just logic applied to data/premises. So it shouldn't be surprising that correct reasoning is just like that. – Brian Pansky@19

Bayes Theorem is extremely useful in certain areas — for example, medical diagnosis, where you are likely to have extensive data on confirmed cases and non-cases of disease X which tell you how often a particular sign o symptom appears, and hence how useful it is in diagnosing disease X, and it therefore *makes sense* to say there a 1/3 chance this case is disease X — one time in 3 that you observe this cluster of signs and symptoms, the correct diagnosis is disease X. It's fuck-all use in almost all cases of historical research, where you are reasonin about unique events, and it makes no sense at all to say there's a 1/3 chance Jesus was real. Either he was, or h wasn't. What you need to do in that sort of historical case is construct one or more hypotheses that cover the facts so far (believed to be) known, then deduce what other data could reasonably be expected to be available if each hypothesis is true, and look for it. What the consensus of relevant experts says (and this includes atheists, agnostics and religious Jews as well as Christians) is that Carrier hasn't even got close to a mythicist hypothesis that accounts for the existing evidence (e.g. the egregious bulshitting he goes in for with regard to Paul referrin to James as "the brother of the Lord").

However, I agree with him on the Jesus myth stuff - PZM@41

And your opinion counts for just as much as mine – viz, fuck-all. How is it that in this particular case so many atheists who are not experts in the field are eager to abandon the general principle that the consensus of releval experts – especially when they disagree on many other issues – is very likely to be right?

46. KG

3 December 2016 at 1:47 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052548)

Further to my #45, and in response to PZ's 41, there's also the evidence of Carrier's crankery in the case of physics (everyone except Brian Pansky seems to accept that that is deluded kookery). So we know Carrier is quite capable of spewing egregious garbage in areas he knows fuck-all about. That should at least alert people t the possibility that his mythicism is similarly deluded kookery. And atheists should particularly beware of accepting conclusions that would be emotionally very satisfying – such as that Christians have made complete fools of themselves by worshipping a person who never even existed.

47. EnlightenmentLiberal

4 December 2016 at 7:09 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052749)

But beyond that, if this was a serious issue, why wouldn't the relevant experts – who include many non-Christians – not have noticed? Are you so much cleverer than all of them?

Are you familiar with the Thompson affair?

http://www.bibleinterp.com/opeds/critscho358014.shtml

(http://www.bibleinterp.com/opeds/critscho358014.shtml)

In short, the scholar who initially advanced mythicism for the old testament patriarchs received quite less than reasonable and welcome response from the so-called expert community for his work. In short, his career was destroyed, almost no one would hire him, and even 15 (IIRC) years later when he received a job in scholarship, he was being accused of being an anti-semite, and the university was attacked for hiring such a person.

One should not bow to expert opinion merely because they happen to occupy the position of "expert". Based or several sources, including the Thompson affair, I'm well convinced that the so-called experts of historical biblic studies are not worthy of that title and respect and trust.

PS.

According to a completely random source, who cites another source:

http://lesswrong.com/lw/iuo/trusting\_expert\_consensus/

(http://lesswrong.com/lw/iuo/trusting\_expert\_consensus/)

Atheist Biblical scholar Jacques Berlinerblau once estimated that at a typical meeting of a thousand members of the Society for Biblical Literature, you'd find only a couple dozen atheists (I'm not sure if he meant to include people like Bart Ehrman, who identifies as an agnostic).

Concerning your claim that the "relevant experts [...] include many non-Christians"? That seems to be false fro a cursory examination. Is my source wrong? On basis do you make your claim?

48.

Owlmirror

5 December 2016 at 5:23 am (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal-sausage-getting-made/#comment-1052808)

@KG:

It's very odd that Paul of Tarsus, who supposedly lived not long after Jesus Christ was supposedly crucified, wrote nothing that invoked any miracles that Jesus performed (other than the resurrection itself) or teachings that Jesus taught. — Owlmirror@16

Why is it odd? His letters are to groups of Christians about various points of procedure or doctrine on whic Jesus would have had nothing to say, because they could only arise once Christianity had begun to spread. These groups had presumably already been told the miracle stories and teachings — or how would they hav become Christians?

Wouldn't these putative teachings they had already been told have had some reference to the law; to behaviors that God wanted from people? At the very least, to the directive to love one's neighbor, emphasized in the Gospels with "Love one another", and expounded upon with the parable of the good Samaritan?

Yet if you look at Galatians, for example, Paul never reminds his readers that Jesus taught this too. Looking at Galatians, Paul makes reference to the OT law, including the part about loving one's neighbor, but nothing abowhat Jesus said about it.

If Jesus had been some putative radical rabbi, wouldn't there have been at least something about what he taugl from or about the law that *made* him radical that Paul would have referenced, considering that both he and his readers presumably would have thought of Jesus as being some sort of authority? Even if they both already have these teachings, wouldn't there have been at least some small thing that Paul would have thought worth referencing and emphasizing as being from Jesus' authority?

But there's nothing about Jesus having said or done anything at all.

But beyond that, if this was a serious issue, why wouldn't the relevant experts – who include many non-Christians – not have noticed?

If you can find one or more non-Christian expert who dismantles the mythicist position using something better than special pleading, I'd like to see it.

Note that mythicists don't think that the mythicist arguments are absolutely conclusive. Maybe Paul had some perfectly understandable reason for not referencing anything that Jesus taught or did, for example. Maybe the argument that James was a member of a brotherhood of Christians (rather than being actual kin to a putative real Jesus) is mistaken, as another example.

But mythicism is not claimed to be absolutely conclusive, only a reasonable conclusion given a close analysis of the available evidence.

It's fuck-all use in almost all cases of historical research, where you are reasoning about unique events, and it makes no sense at all to say there's a 1/3 chance Jesus was real. Either he was, or he wasn't.

Ow. Someone throws a 6-sied die, and it falls where you can't see it. That's a unique event that has already happened.

Are you really going to say that it makes no sense to say that there's a 1/6 chance that it came up "6"? It either came up 6 or it didn't?

Bayesian history is basically trying to figure out how many sides the "dice" of historical events have.

## Case: 2:16-cv-00906-MHW-EPD Doc #: 17-22 Filed: 12/22/16 Page: 13 of 13 PAGEID #: 427

What you need to do in that sort of historical case is construct one or more hypotheses that cover the facts so far (believed to be) known, then deduce what other data could reasonably be expected to be available if each hypothesis is true, and look for it.

You have to be careful with this, though — there are Christians who proudly proclaim that they use just those methods to prove that Christianity is true; that Jesus existed and did miracles, and so on.

But then, there are also Christians who do the same thing with Bayesian probability analysis. Any method can labused.

What the consensus of relevant experts says (and this includes atheists, agnostics and religious Jews as wel as Christians) is that Carrier hasn't even got close to a mythicist hypothesis that accounts for the existing evidence (e.g. the egregious bulshitting he goes in for with regard to Paul referring to James as "the brother of the Lord").

Heh. Is it your expert opinion that it's "egregious bullshitting"?

And atheists should particularly beware of accepting conclusions that would be emotionally very satisfying – such as that Christians have made complete fools of themselves by worshipping a person who never ever existed.

This is an odd criticism to levy, given that as atheists, we all conclude that all religious people ever worship (or did worship) one or more invisible intangible persons who never even existed.

While I think religious people are wrong, I don't think they "have made complete fools of themselves". And tha certainly not the reason I think that mythicism is at least somewhat reasonable.

49. KG

14 December 2016 at 2:19 pm (http://freethoughtblogs.com/pharyngula/2016/12/02/watching-the-legal sausage-getting-made/#comment-1054235)

EnlightenmentLiberal@47,

I suppose it depends what you mean by "many". Among the *prominent* non-Christian scholars of the NT and closely related issues are: Geza Vermes, Hector Avalos, Bart Ehrman, Burton Mack, Robert Eisenman, Gerd Lüdemann, Dennis R. MacDonald (possibly regards himself as a Christian, but if so, on what grounds is unclear), Richard E. Rubenstein, James Tabor, Robert M. Price (the only mythicist in my list). The Thompson affair certainly shows that some university departments are intolerant – but note that Thompson (an OT scholar course), like most of the NT scholars I list, has or had a tenured position at a resepcted university.

Leave a Reply

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MOBILE APPS

INVITATIONS CARDS PARTY IDEAS INSTANT GIFTS

HOST: Dave & Dana 415-748-1126

# WINE & WHISKEY FAREWELL PARTY FOR RICHARD CARRIER

SATURDAY, MAY 21 FROM 5:00 PM TO 11:30 PM

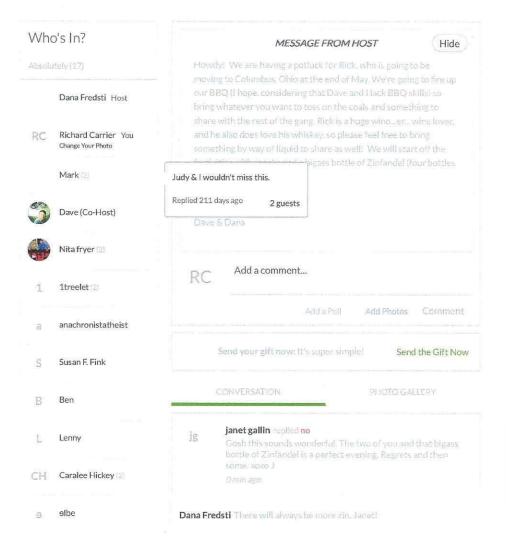
Dava & Dana's house

FIND VENDORSh Designs

REGISTER SIGN IN

×

This event has already occurred.



Affidavit Exhibit V

		@min.ago	
or	ona reiter	Write a (	Comment
Hmmn	1(2)		
		S	sexpositivepsych replied maybe
Unthin	kable (13)		I've got a friend who may be in town that weekend so as soon as I know I'll update!
Not Ye	t Replied (23)		G min ago
ВА	Brooke Armstrong	Dana Fred	sti Please feel free to bring your friend!
		9 min ago	
CL	Chris Lindstrom	Write a 0	Comment
d	dan-fox		Caralee Hickey replied yes + 1 guest
		CH	The husbands coming too.:)
d	dhavis		O min ago
		Caralee Hi	ickey "husband's
d	dksf	Omin aga	
d	dr.marcy.meyer	Dana Fred	sti Excellent! If you have more than one husband, you're
и	di.marcy.mcycr		llowed to bring 'em!
f	freethoughtguy	0 min ago	
		Write a	Comment
ġ.	gilly.lloyd		
0	20	S	Suzanne Rose Epstein replied maybe
9	glamtasm	_	I'll try to make it. I think I can!! I have a gig that afternoon in the South Bay, but I can probably get back in time.
			0 min aga
00	greta		
		Dana Fred	Isti I'm sure it will be late!
h	havis		
		Dana Fred	Isti The party, that is, running until late: ;-)
j	jagbrack		
		vvrite a	Comment
j	james		
		В	Ben replied yes Omin ago
j	jjgallin		Onnedgu
4	Econo	Write a	Comment
k	ken		
LM	LMon		Lenny replied yes
18181	ATTEMPTED	L	Party Time!
Ē	larry.kaufman		0 min ago
		Mritos	Comment
LK	Leslie Keats	vvrite a	Comment
1	lukeprog	RC	Richard Carrier replied yes
			ommago X
m	mgzogg	Dana Fred	isti You had BETTER be here or we'll drink all the wine!
		O min ago	The state of the s
	nurseingrid	\Mrite a	Comment

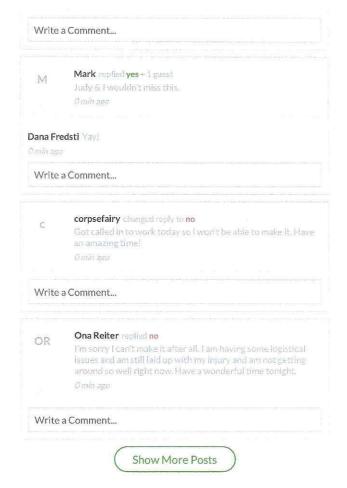
RB Rick Brown

tim tim

C	Corpsefairy replied yes Ominago
Write	a Comment
JG	Juliana Gallin replied no
	Sad news for the Bay Area, but sounds exciting for Richard! I can't make it that weekend, but I'm sending my love and bon voyages.  Omin ago
Write	a Comment
	wahnski replied no
W	Boo-Hoo, So sorry to miss your party. Ain't nothing I can do about the other plans I made long ago. Thanks for the invitation and my best to you and Richard! skirooxx Omin ago
Write	a Comment
m	margaretmorgan_sf replied no  @min.ago
Write	a Comment
j	Jimhpac replied no O min ago
Write	a Comment
5	Susan F. Fink roolled yes  Will head over after work by 7 pm or so. Bigass Zin would be a great band name.
	O min ago
Write	a Comment
Nf	Nita fryer replied yes + 1 guest
1.11	I have a gig in the late afternoon so we will be little later. We'll strategize on how to get there together.  Ominaga
ana Fre	edsti Glad to know you'll be here, you two!
Write	a Comment
	THE RESERVE AND THE STATE OF THE PROPERTY OF T



## Case: 2:16-cv-00906-MHW-EPD Doc #: 17-23 Filed: 12/22/16 Page: 5 of 5 PAGEID #: 432



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V/U= 5.197400409445274904

## Miri Mogilevsky



April 8



## **Richard Carrier**

4/8, 10:57pm

Just FYI, I'm trying to remember who to tell before I go more public with it, but I'll be moving to Columbus end of May. I consider you a friend. So it seemed appropriate to include you in the loop ahead of time.



Miri Mogilevsky
AHHHHHHHHH

. 4/8, 11:20pm

sorry I'm really excited because I'm drunk
Anyway that's awesome



**Richard Carrier** 

4/8, 11:20pm



I approve of your drunkenness. And thank you.

I'll reward you with a business fish...



**Richard Carrier** 

4/8, 11:21pm





## Miri Mogilevsky





## **Richard Carrier**

0 4/8, 11:21pm





Miri Mogilevsky Yesssss

4/8, 11:25pm

April 9



## Miri Mogilevsky

4/9, 8:05am

Okay, now that I'm not wasted off my ass: yay! Do you know where you'll be living?

April 9



Richard Carrier
Clintonville.



4/9, 2:51pm

Miri Mogilevsky

That's great. I love Clintonville.

4/9, 2:54pm



## **Richard Carrier**

3.05pm

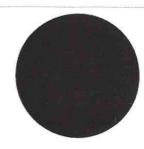
I got a good place at a good rent (taking over Mary Beaton's apartment, Amanda's metamour).



Amy Frank > Messenger







# Amy Frank

1 mutual friend: Justin Schieber

Lives in Phoenix, Arizona

Affidavit Exhibit Y

1:27 PM

Hi Dylan, I'm the president of the SSA at Arizona State. Did your group happen to get funding from the SSA for Dr. Carrier? Wondering because I want to bring him out but I don't see him on the speakers bureau list. Thanks



You accepted Amy's request.

I'm not a student, but I am a board member of a few groups and we work with the SSA at FIT. My groups paid for Dr. Carrier and the SSA secured us a location. Do you have an groups in the area who are willing to

Type a message...







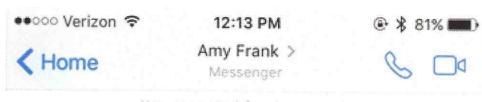












You accepted Amy's request.

I'm not a student, but I am a board member of a few groups and we work with the SSA at FIT. My groups paid for Dr. Carrier and the SSA secured us a location. Do you have an groups in the area who are willing to work with you. Also Dr. Carrier contacted a wide swath of us in FL because he was going to be in the area. His cost was cheap \$200, but it might be wise to see if he plans to be in the area and work with local groups so he can entertain multiple speaking events so it is worth the trip. Feel free to contact me anytime if you have any questions.



Thanks for the info!

Anytime



voe a message.







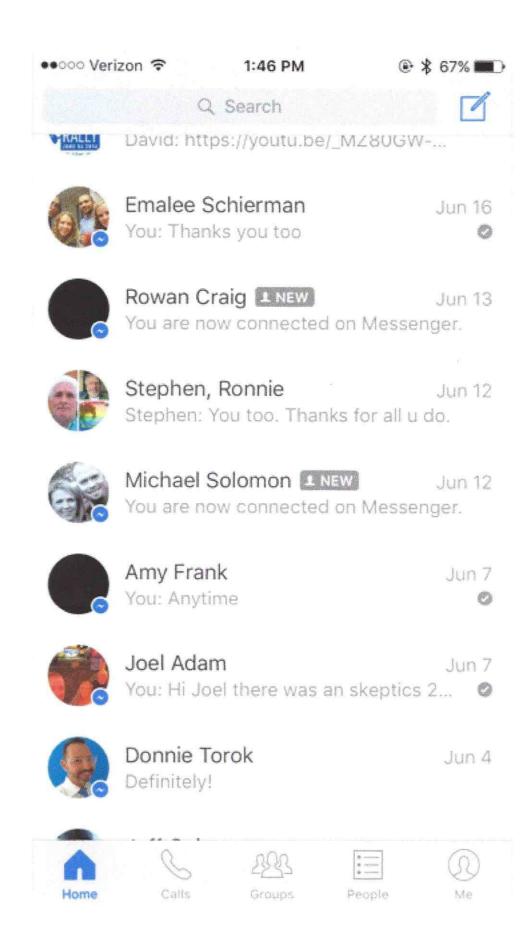


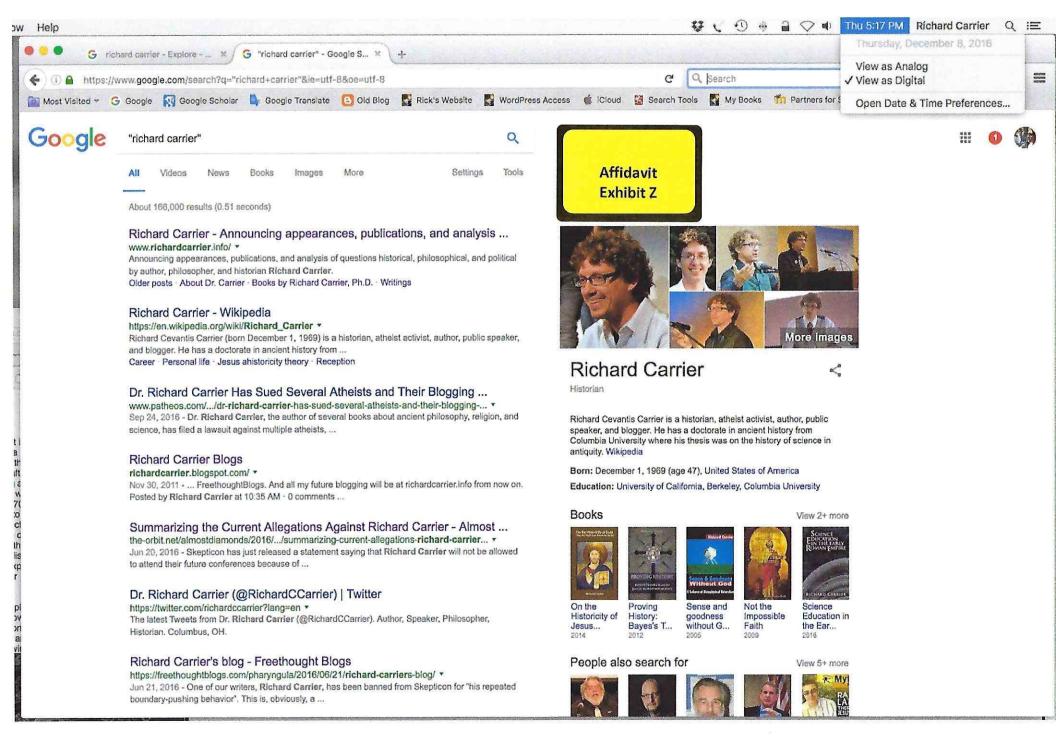


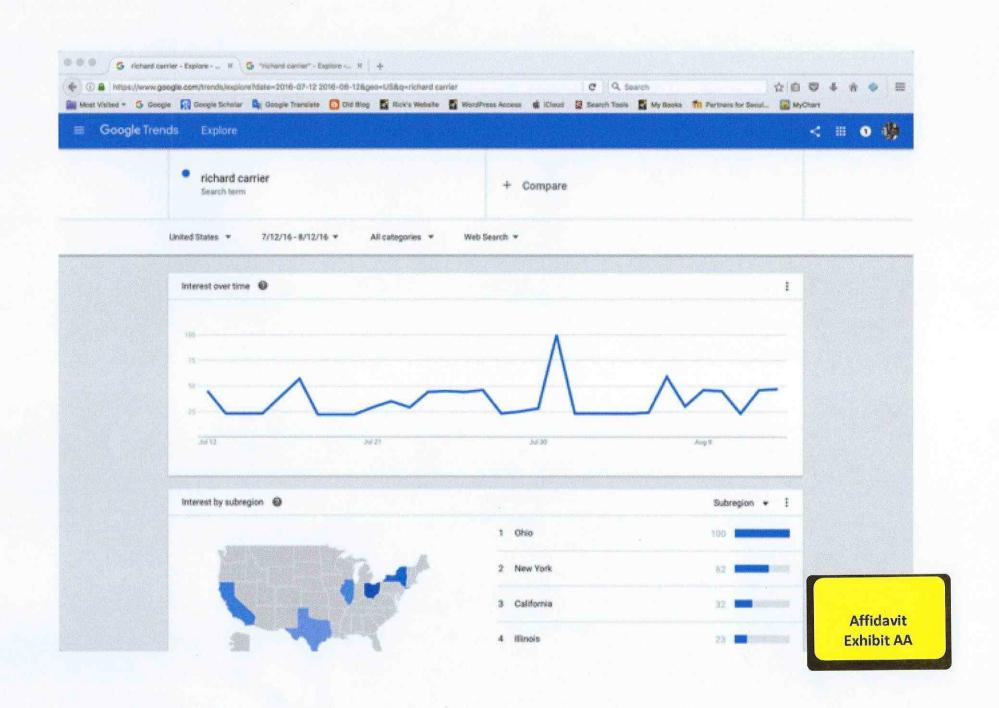


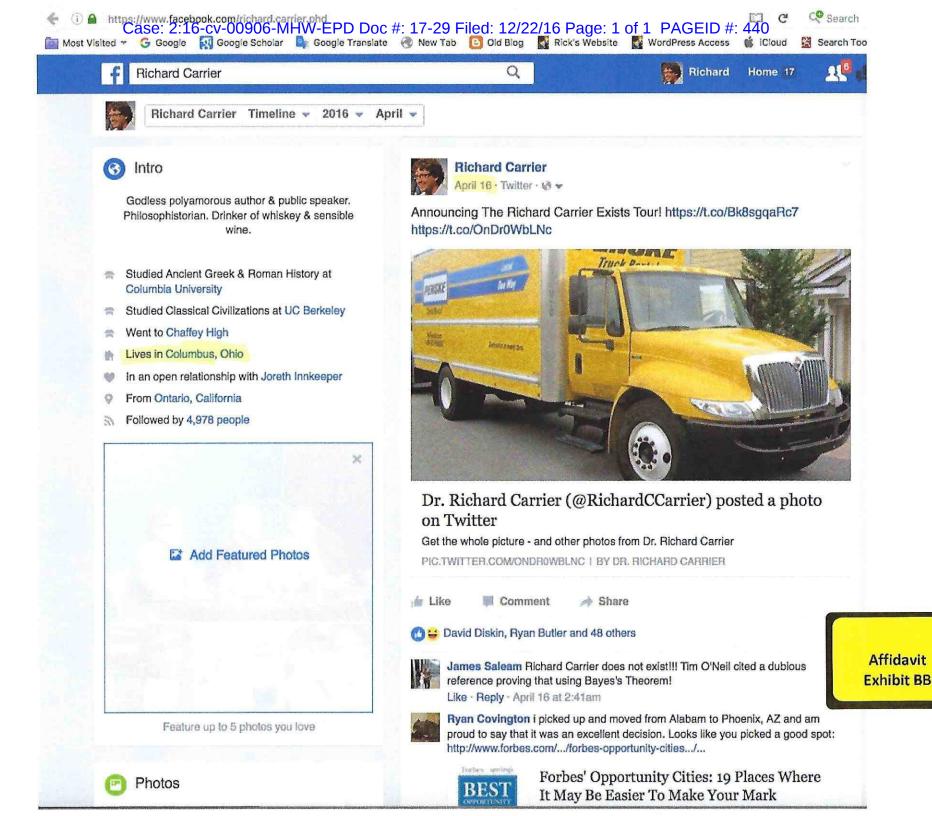














ď

Richard

Home 17



4j-

Richard Carrier Timeline v 2016











(S) Intro





Philosophistorian. Drinker of whiskey & sensible

wine.

Lenny Maughan added 17 new photos -- with David Fitzgerald and 5 others.

WINE & WHISKEY; David and Dana host a farewell party (and a reunion of old friends) for Dr. Richard Carrier, who leaves for Ohio at the end of the month. Safe travels, Rick! May 22 - 41 w







Studied Classical Civilizations at UC Berkeley

Studied Ancient Greek & Roman History at

Columbia University

In an open relationship with Joreth Innkeeper

Lives in Columbus, Ohio

Went to Chaffey High

Followed by 4,978 people

From Ontario, California







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C Love





**Exhibit CC** Affidavit

Suzanne DesertRose Sorry I missed the party. I thought I'd be able to squeeze it in after my South Bay gig, but alas, I wasn't able to do it all. 33

Unlike - Reply · C 3 · May 22 at 8:29pm



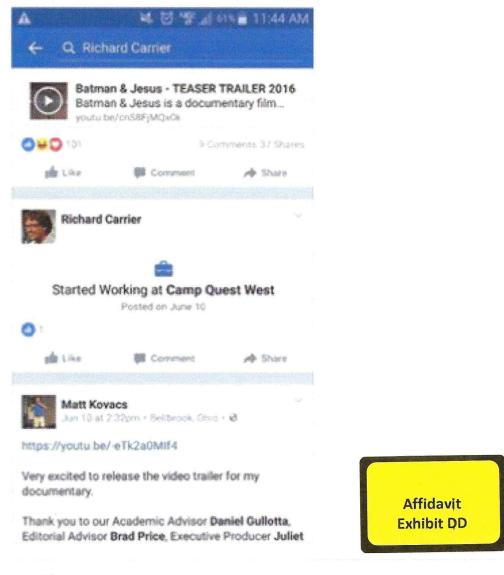
Dana Fredsti We totally understand, Suzanne!



Feature up to 5 photos you love

If you've been a victim of harassment or assault at any SSA-sponsored event, please feel free to contact me. I will keep your name confidential.

#secularstudentalliance #sexualassault #sexualharassment #nomeansno #resign



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