

1 Michael S. Kwun (SBN 198945)  
mkwun@kblfirm.com  
2 Nicholas A. Roethlisberger (SBN 280497)  
nroethlisberger@kblfirm.com  
3 KWUN BHANSALI LAZARUS LLP  
555 Montgomery St., Suite 750  
4 San Francisco, CA 94111  
Tel: (415) 630-2350

5  
6 Ben Rosenfeld (SBN 203845)  
ben.rosenfeld@comcast.net  
ATTORNEY AT LAW  
7 3330 Geary Blvd., 3rd Floor East  
San Francisco, CA 94118  
8 Tel: (415) 285-8091  
Fax: (415) 285-8092

9 Attorneys for Defendant  
10 ISIS LOVECRUFT

11  
12 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
13 **OAKLAND DIVISION**

14 PETER TODD, an individual,

15 Plaintiff,

16 vs.

17 SARAH MICHELLE REICHWEIN aka ISIS  
AGORA LOVECRUFT, an individual,

18 Defendant.  
19  
20

Case No.: 4:19-cv-01751-DMR

**DECLARATION [REDACTED] IN  
SUPPORT OF SPECIAL MOTION TO  
STRIKE, OR, ALTERNATIVELY,  
MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT**

**REDACTED VERSION OF  
DOCUMENT SOUGHT TO BE SEALED**

1 I, [REDACTED] hereby declare:

2 1. I am a female, adult individual, age 24. I presently reside in Boston,  
3 Massachusetts. On July 14, 2019, I signed a declaration similar to this one under the pseudonym  
4 “Jane Doe” and signed “JD,” fearing harassment and retaliation if I used my real name. I am  
5 agreeing now to use my real name, provided that my name, and certain geographical information  
6 which could help third parties unrelated to this case identify me, are filed under seal and redacted  
7 from public view. I continue to implore the plaintiff, Peter Todd, in the civil action known as  
8 *Todd v. Lovecraft*, No. 3:19-cv-01751 (filed in the United States District Court for the Northern  
9 District of California), his attorneys, and their agents, not to divulge my name, in court filings or  
10 otherwise.

11 2. On or about February 10, 2018, I was speaking to a friend, Zooko, when the  
12 subject of predatory sexual behavior by men in computer tech, my field, arose. Based on that  
13 conversation, Zooko put me in touch with Isis Lovecraft, with whom I was familiar but not  
14 acquainted.

15 3. On or about February 15, 2018, Isis and I began to communicate over the  
16 messaging platform Signal. In the course of those communications, I informed Isis that I was  
17 raped by Peter Todd in May 2017. Specifically, I told Isis, in substance, all of the following:

- 18 a. While I was studying abroad in [REDACTED], I invited Peter Todd, whom  
19 I then considered a friend, to visit me, since he was passing through Germany at  
20 the time.
- 21 b. On the day of Mr. Todd’s arrival, I was sleep deprived, having a taken a midterm  
22 that day. I have a neurological sleep disorder which causes me to have ‘sleep  
23 attacks,’ during and after which I experience such symptoms as cognitive deficits  
24 and temporary paralysis.
- 25 c. As we walked around, I felt an attack coming on. I told Mr. Todd all the  
26 symptoms he could expect to see.
- 27 d. Then my legs buckled in the street and Mr. Todd helped me back up. He  
28

1 expressed concern and said that we should get me to the nearest hotel room where  
2 I could sleep and wait out the symptoms. Since I was not near home, I agreed.

3 e. When we got to Mr. Todd’s hotel room, I tried to sleep on the couch so I didn’t  
4 give him any wrong signals, but he physically crowded me and badgered me into  
5 sleeping in his bed. He then got into bed with me.

6 f. I fell asleep and woke up, still under the effects of the attack.

7 g. We then went to dinner, where Mr. Todd tried to impress me with his influence,  
8 connections, and money, telling me he could offer me a job.

9 h. After dinner, I went back to Mr. Todd’s room with him, feeling a sense of  
10 obligation to hang out with him a little longer because he had paid for dinner.

11 i. Mr. Todd started asking me about my midterm while pushing physical  
12 boundaries. I tried to leave three or four times, announcing each time that I  
13 should leave, but each time, he pulled me down onto his lap.

14 j. I gave up resisting. Realizing I couldn’t leave, I just thought, ‘this is the way  
15 things will go.’ I consider what happened next rape, and told Isis so.

16 k. Afterward, I locked myself in the hotel bathroom and sobbed for three or four  
17 hours. At about 5:00 am, I left and walked home, crying the whole way.

18 4. Later that day or soon thereafter, Mr. Todd messaged me saying he had slept well  
19 and asking if I had. I did not respond. I have not interacted with Mr. Todd since that night in  
20 May 2017.

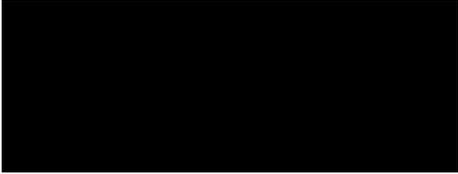
21 5. Exhibit A attached hereto contains true and correct copies (screenshots) of part of  
22 my February 15, 2018 Signal message exchange with Isis Agora Lovecruft, referenced above  
23 and in my July 14, 2019 declaration, including my statement to Isis, “he [Peter Todd] raped me.”  
24 My messages to Isis in this Signal exchange are in the blue bubbles aligned on the right margin,  
25 and Isis’s messages to me are in the light gray bubbles aligned on the left margin.

26 6. Again, I implore anyone who is made aware of the contents of this declaration, or  
27 of the message exchange in Exhibit A, to preserve my anonymity.  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

I swear under penalty of perjury that the foregoing is true and correct.

Dated: August 4, 2019

—  —

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT “A”**



but i didn't have the actual courage to just tell him, so i lied and responded "sorry i'm actually in berlin" when i really was in amsterdam

the funny part is that it never occurred to him that i would lie about being in berlin to avoid him

i feel bad about lying, i should have just been like "fuck you dude, you're a creep"

germany has \*horrible\* laws and culture when it comes to "feminist" stuff like "not getting raped" and germany's laws have been called a carte blanche for rapists

FEB 15, 2018 21:43

well, guess i'm kinda glad i didn't report him then

FEB 15, 2018 21:45

oh no, what did he do



New Message



