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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

PETER TODD, an individual,

Plaintiff,

v.

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

Defendant.

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

**DECLARATION OF NADIM KOBEISSI IN
SUPPORT OF PLAINTIFF'S OPPOSITION
TO DEFENDANT'S SPECIAL MOTION TO
STRIKE PLAINTIFF'S COMPLAINT (ANTI-
SLAPP MOTION)**

Date: August 22, 2019

Time: 1:00 p.m.

Location: Courtroom 4

Complaint Filed: April 3, 2019



1 I, Nadim Kobeissi, do hereby declare:

2 1. I am an individual residing in France, and I executed this declaration in
3 France. I am not a party to this lawsuit. Unless otherwise stated, I have personal
4 knowledge of the facts set forth in this declaration, and if I were called as a witness, I
5 could competently testify to the facts in this declaration.

6 2. I am a computer science researcher, specializing in applied cryptography,
7 protocol analysis, and formal verification. I have published peer-reviewed research
8 focusing on applied cryptography and automated protocol verification, and I have
9 maintained several open source projects. I regularly attend conferences on cryptography.

10 3. On a handful occasions over the last few years, I have personally met the
11 Defendant, known to me as Isis Agora Lovecruft, at cryptography conferences.

12 4. Additionally, on a handful occasions, Defendant, others, and I engaged in
13 social activities outside of conferences.

14 5. In 2012, Defendant, others, and I visited a beach. While the group was
15 relaxing on the beach, Defendant, unprompted, removed all of her clothes directly in front
16 of me. Unsure how to proceed or what Defendant wanted, I politely kissed Defendant on
17 the cheek (as relatives would greet each other) and then turned my attention to others in
18 the group.

19 6. Thereafter, and for several years, Defendant and I engaged in the same
20 type of interactions and pleasantries, and there was no evidence of hostility by Defendant
21 toward me.

22 7. On February 20, 2019, Defendant published the following Tweets:

- 23 • "Nadim Kobeissi is a serial rapist and abuser who defends other rapists
24 including Jacob Appelbaum and Peter Todd and in 2012 he grabbed my
25 face and force kissed me at a conference and i absolutely believe the
26 multiple survivors i've personally spoken with since then."
- 27 • [In response to third-party's Tweet: "Peter todd is a rapist?" Defendant
28 Tweeted] "yes, similar to Nadim, i personally have a story about Peter Todd

and i've personally spoken with survivors with absolutely awful and horrifying reports who are terrified of him and of coming forward (rightly so) [¶] i however am not afraid and shitty dudes are going down"

- "Nadim. since i know you're reading this and telling people to report it: i'm going to start doing lightning talks at crypto conferences with more details of your horrid behaviours in order to warn your future victims, do not fuck with me"

(the "Tweets"). True and correct copies of the Tweets are attached hereto as **Exhibit A**.

8. The Tweets are completely false. I have never raped or sexually assaulted anybody. I have never grabbed Defendant's face or forced Defendant to kiss me.

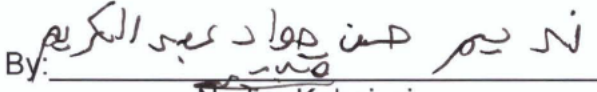
9. Defendant published these Tweets apparently because Defendant believed that I had stood up for another person who Defendant accused of rape—i.e., Jacob Applebaum.

10. Defendant's false Tweets have caused me significant harm in both my personal and professional life.

11. I considered but chose not to pursue legal action against Defendant because I was worried that Defendant would use that legal action as a platform to further publicize Defendant's horrific false statements about me. I am also worried that Defendant will submit a false declaration by a third party falsely claiming that I raped or sexually abused that person.

12. I have never met Plaintiff and I have no way to understand whether the allegations against him are true or not. My only experience relates to Defendant, in the capacity that Defendant has in the past made false statements about me personally.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 18, 2019.

By: 
Nadim Kobeissi