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Of Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF OREGON

GREGG SCHUMACHER and LINDA )  
 SCHUMACHER, individually and as )  
 husband and wife, and GREGG )  
 SCHUMACHER FURS LLC dba )  
 SCHUMACHER FURS & OUTERWEAR, )  
 )  
 Plaintiffs )  
 )  
 v. )  
 )  
 CITY OF PORTLAND, a municipal )  
 corporation; IN DEFENSE OF ANIMALS, )  
 a foreign nonprofit corporation; ANIMAL )  
 LIBERATION FRONT, an unincorporated )  
 association; PEOPLE FOR THE ETHICAL )  
 TREATMENT OF ANIMALS, INC., a )  
 foreign nonprofit corporation; MATT )  
 ROSSELL; KEVIN MEIRAS aka "Bluejay"; )  
 CONNIE DURKEE; ALEX LILLI; JOHN )  
 DOES 1-10; and JANE DOES 1-10 )  
 )  
 Defendants. )

No.

**DECLARATION OF SCOTT  
 CASTLEMAN IN SUPPORT  
 OF PLAINTIFFS' MOTION FOR  
 A PRELIMINARY  
 INJUNCTION**

I, SCOTT CASTLEMAN, under penalty of perjury, do declare the following:

**I. INTRODUCTION**

1. I have been an eyewitness to the mob gatherings at Schumacher Furs. I am personally familiar with the facts recounted herein. I am both founder/proprietor and one of the investigators of Corporate Crime Control Association. Plaintiff Schumacher Furs and Outerwear (SFO) hired Corporate Crime Control Association to conduct a threat assessment, monitor the mob gatherings at their place of business, and provide information to Portland Police. Corporate Crime Control Association has been involved on-site since September 2006, providing a security presence, documenting the actions of the individuals associated with the extremist organizations identified with the mob, and documenting their activities as well as some of the Police responses.

**II. PERSONAL BACKGROUND AND QUALIFICATIONS**

2. I have 14 years experience in crime prevention, executive protection services, and conducting threat assessments. I am licensed by the Oregon Board of Investigators Private Investigators, License #1998291. I have been lead investigator on hundreds of cases including aggravated murder and most classifications of felony and misdemeanor crimes. I am a nationally published author of training materials and have published numerous articles in the security field. I provided logistical and protective support for President George W. Bush while he campaigned in Oregon during 2000. I have provided logistical and protective support for President George W. Bush and Vice-President Dick Cheney during various visits to Portland, Oregon. I have also provided protection to various public personalities and high risk clients.

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**III. ACTS OF VANDALISM, HARASSMENT, AND INTIMIDATION  
OBSERVED FIRSTHAND AND/OR DOCUMENTED IN CORPORATE  
CRIME CONTROL ASSOCIATION INCIDENT LOGS.**

3. I have been an eyewitness to the mob gatherings that occur each Saturday at Schumacher Furs. One tactic they use to interfere with SFO business is high noise levels. Beginning the first Saturday I observed the events outside SFO, September 16, 2006, and continuing virtually every weekend since then, someone in the group is using a bullhorn. When I told Officer Lai of the Portland Police Bureau about the noise on September 16, 2006, he stated that this was legal as long as the noise is not amplified such that it can be heard beyond 100 feet. I promptly walked off 150 feet to find the voice through the bullhorn still clearly audible. Neither Officer Lai nor any other Portland police officer provided enforcement on this occasion, nor any other that I am aware of, of noise ordinances being violated. The mob also regularly plays a battery-operated television loudly enough to be heard by customers inside the store. Matt Rossell is one of the leaders of the groups. He often uses a bullhorn and handles setting up the television set to show scenes of animal torture and broadcast the cries of animals being tortured. On December 9, 2006 he displayed a sign from the organization "In Defense of Animals."

4. Another noise tactic involves a type of small, but piercingly loud horn. Members of the mob will gather together and blow these horns very loudly for over 30 minutes. This causes distinct discomfort and a ringing in my ears. One time the ringing lasted for 40 minutes. On another occasion, following a more intense noise attack, the ringing lasted three hours. The horns are used during almost every Saturday protest.

5. Individuals that make up the mob have stated to me that they are aware that the Portland police will not enforce the law against them. This seems to embolden them and encourage more aggressive acts. I have heard officers of the Portland police state that they are under orders not to respond to calls from SFO. I have also heard Portland police

officers state publicly that customers will not file complaints. I know this is not true because I have seen customers attempt to report to officers who refused to take any kind of action in response. I have watched the police observe the acts described in this Declaration and take no action. I have even seen a photograph of a Portland police officer posing for photos with members of the mobs that harass, stalk, and intimidate SFO customers and employees. Portland police have been stationed across the street from SFO and have observed much of the protest activity. With rare exceptions, the Portland police, even though they are stationed across the street and observing what happens, have not taken action to enforce the law or otherwise regulate the activities of the protesters.

6. Those gathered in front of SFO are intentionally causing fear in an attempt to keep people out of the store. On October 7, 2006, I heard a passenger in a passing car speaking to some of those blocking the sidewalk conducting the acts of intimidation and harassment by yelling such things as “fur hag” and “murderer.” Due to the manner in which the mob was acting, the occupant of the car stated, “I would be scared to go in that store.” The response was, “Good. We’re getting the job done, then.” Also this day, the mob was covering the area with graphic photographs of dead animal carcasses and broadcasting animal screams loud enough to be heard across the street. They also routinely block windows of the store where SFO maintains displays visible to the general public.

7. Those creating the disturbance on the sidewalk outside SFO intimidate verbally and in other ways. All gatherings involve yelling at customers that the customers are “murderers” and that the customers are “fur hags.” On October 14, 2006, one member of the mob gathering confirmed that “fur hag” is a sexually derogatory remark. A staple of the Saturday disturbances is harassment of customers after they leave SFO. Masked individuals follow customers, yelling at them as they walk down the street, sometimes forcing the customers to seek refuge in other businesses. They routinely yell things at

customers such as “whore,” “slut,” and “you fucking murderer.” This is often done in groups and close in to customers’ faces. On November 24, 2006, a member of the mob gathering brought a dog which he described as aggressive. Then he incited the dog to bark at me and fellow security officers.

#### **IV. THE MOBS CREATE DANGER FOR THEMSELVES AND OTHER PERSONS**

8. Members of the mob gatherings harass members of the general public also. They mill about on the sidewalk, blocking the sidewalk for other users and blocking customers from getting to SFO. They leave signs and posters on the sidewalk. This human mass forces people on the sidewalk to step into the street. This also creates danger for those causing the problem! On November 25, 2006, I pulled several of them back from the MAX tracks to save them from being hit by an approaching MAX train. They harass people unrelated to the business at SFO by broadcasting the alleged screams of tortured animals loud enough to be heard across the street and by thrusting signs in the faces of passersby. And individuals in the mob escalate the potential for violence. On November 11, 2006 one of them carried a knife visible in his front pocket. On December 2, 2006, another carried a sign on a stake. They also bring cheerleaders. On November 4, 2006, the cheerleaders used their pompoms to hit passersby. I have not determined what triggers aggression toward persons who are not customers of SFO, but it continues to be a consistent hazard to citizens on the street in proximity to Schumacher Furs. During the Christmas shopping season, children were targeted for both vulgar statements and presentation of videos of animal torture.

9. Another significant danger I have observed is that passing motorists often become more focused on the unruly disturbance on the sidewalk than the street they are driving on. This has been the cause of several near accidents between cars and several close calls

between pedestrians and cars.

## **V. STATEMENTS**

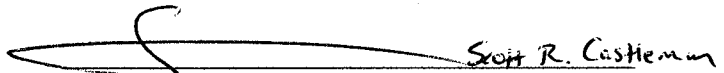
11. Recently I took the statement of "LS." Prior to this disturbance, LS was involved with neither SFO nor the extremist organizations represented at the Saturday harassment. However, members of the mob accosted her when she was passing by. As the hostility rose, one of those attempting to intimidate her began yelling in her face. He was close enough that spittle was landing on her face. Before leaving, she approached Portland police officers, who had watched the entire episode of harassment. The officers stated that they would not do anything because she had not been touched by the one accosting her. When she tried to leave, her intimidator followed her, yelling at her as they both walked down the street away from SFO.

## **VI. THREAT ASSESSMENT**

10. I assisted in conducting a threat assessment. Based on reports of eyewitnesses to the events, I concluded that Gregg Schumacher and Linda Schumacher are at an elevated risk for personal assault. They have both been subjected to threats that come through mail, email, and chants and yelling outside their store that is audible within. Employees are at a lesser but still significant risk of assault. Extremists followed one employee home on her MAX or busline, made sexually graphic gestures at her, and taunted her with name-calling. Customers are at a moderate to high rate of risk for personal assault. This is difficult to generalize because it depends on how they individually respond to those attempting to intimidate them. A response from someone on the sidewalk generates quickly escalating aggression from an increased number of those gathered nearby. Although Portland police began to dispatch officers to be near the situation, over time their limited response emboldened those attempting to intimidate SFO and those on the sidewalk near the store. In researching the groups that individuals in the mobs were

identifying, Animal Liberation Front, In Defense of Animals, People for the Ethical Treatment of Animals, I learned that some or all of these groups are willing to cause injury to person and property. In mid-October 2006, after noting that the mobs were becoming increasingly aggressive, and noting that the response by Portland Police Bureau was very limited, I asked SFO for increased number of security personnel on-site during the most intense harassment, which tends to be Saturday, their primary retail day. Corporate Crime Control Association has also kept, and continues to keep, detailed reports of security officer observations of the weekly disturbance.

DATED this 18<sup>th</sup> day of April, 2007.

  
Scott Castleman