

United States of America
In the District Court for the Eastern District of Michigan
Southern Division

AFT Michigan,
Plaintiff,

Hon. Linda V. Parker, District Judge
Hon. Elizabeth A. Stafford

v

Case No.: 17-cv-13292

Project Veritas, a foreign corporation,
and Marisa L. Jorge, a/k/a Marissa Jorge,
a/k/a Marissa Perez,
Defendants.

MARK H. COUSENS
Attorney for the Plaintiff
26261 Evergreen Road, Suite 130
Southfield, Michigan 48076
cousens@cousenslaw.com
248-355-2150
P12273

PAUL M. MERSINO
BUTZEL LONG
Attorney for Defendants
150 W Jefferson, Suite 100
Detroit, Michigan 48226
mersino@buztel.com
313-225-7000
P72179

STEPHEN R. KLEIN
Attorney for Defendants
Barr & Klein, PLLC
1629 K St. NW, Suite 300
Washington DC 20006
202-804-6676
steve@barrklein.com
P74687

ANN M. SHERMAN
Deputy Solicitor General
Attorney for Intervening Party
State of Michigan
Michigan Department of Attorney General
POB 30212
Lansing, Michigan 48909
517-335-7628
ShermanA@michigan.gov

Abigail V. Carter (DC Bar # 47454)
Joshua Rosenthal* (CA Bar # 325949)
Bredhoff & Kaiser PLLC
Attorneys for Movant
805 15th Street NW # 1000
Washington DC 20005
202-842-2600
acarter@bredhoff.com
jrosethal@bredhoff.com

JOSEPH E. SANDLER
Attorney for Plaintiff
Sandler Reiff Lamb Rosenstein & Birkenstock PC
1090 Vermont Ave., N. W., Suite 750
Washington, D.C. 20005
202-479-1111
sandler@sandlerreiff.com

MARK H. COUSENS
ATTORNEY

26261 EVERGREEN ROAD
SUITE 130
SOUTHFIELD, MICHIGAN 48076
PHONE (248) 355-2150
FAX (248) 355-2170



DECLARATION OF BRADFORD MURRAY

Declaration of Bradford Murray

1. My name is Bradford Murray. I am employed by the American Federation of Teachers as a Manager. I have been so employed since 2010.
2. I have extensive experience conducting background and public records investigations. Over the past decade, I've examined the public records of thousands of people and companies.
3. On behalf of AFT Michigan I have sought to locate Richard Seddon for the purpose of serving him with a subpoena to testify in this litigation.
4. Richard Seddon has, without question, taken more extreme measures to prevent the association of his identity with his primary residence, than any other I have looked at.
5. I am familiar with Richard Seddon's activities and his background. Mr. Seddon has been trained in spycraft having worked for agencies attached to the government of England.
6. I believe, based on my research, that Mr. Seddon is a former senior agent of the British Secret Intelligence Service, also known as MI6. I believe that his former work helped Mr. Seddon familiarize himself with the methods used to associate an individual with their address, as well as methods to minimize one's public record presence.
7. I believe, based on my research, that Seddon has lived in the United States since the 1990s and has associated himself with organizations who have an interest in his particular skills and experience.
8. Mr. Seddon was engaged to work with Project Veritas during 2016 and 2017 and was assigned to supervise the "journalists" employed by Project Veritas. He has been identified as the person who supervised Defendant Marissa Jorge while the infiltration of AFT Michigan was being planned.
9. Seddon is believed to be a critical witness to the decision by Defendant Project Veritas to infiltrate AFT Michigan.
10. Efforts have been made to locate Mr. Seddon beginning with the onset of this litigation. Subpoenas were issued in March, 2020 and again in June, 2020 and delivered to process servers in Montana where Mr. Seddon was believed to be residing. AFT Michigan also attempted to serve Mr. Seddon at a residence in Virginia formerly used by his wife.
11. However, Mr. Seddon has taken measures to hide his identity and location and keep his public records "footprint" secret.
12. Mr. Seddon's apparent attempts to minimize his public records presence include the use of mail forwarding services to prevent the association of his identity with his mailing

MARK H. COUSENS
ATTORNEY

26261 EVERGREEN ROAD
SUITE 130
SOUTHFIELD, MICHIGAN 48076
PHONE (248) 355-2150
FAX (248) 355-2170



address. Mr. Seddon also owns his car in the name of an anonymous LLC and owns his home in the name of a property trust. He appears to use phones not associated with his actual name and uses encrypted communication services.

13. These acts are fully consistent with the recommendations made by privacy consultants. These measures, which often involve significant cost, are intended to frustrate attempts to locate the address of an individual.
14. I have worked extensively to locate Mr. Seddon for three years without success. However, Mr. Seddon's address was recently located.
15. Identifying Mr. Seddon's primary residence was extraordinarily difficult. The house is not connected to Mr. Seddon in any public records that I could uncover. His house—a new construction which is not yet complete—is owned through an anonymous property trust. The only record linking Mr. Seddon to this property is an assessor record linking the property to a PO Box owned by an associate of Mr. Seddon. Development on this property did not begin until May 2020.
16. Mr. Seddon was finally served with a subpoena on June 26, 2021. The process server has written this declaration (attached):

A little girl answered the door at 836 Sydnie Lane, Powell, WY. This little girl is either Richard Seddon's daughter or possibly granddaughter, (Isabelle, 4 or 5 YOA. She answered the door along with her dog, Noah. Isabelle went inside leaving the front door open. After a few moments she returned and then an older lady came to the door whom I assume was Mr. Seddon's wife. She asked what I had and I told her I had a Subpoena for Richard Seddon and she confirmed Richard resided at this property. She indicated to wait and went to go get him while Isabelle and Noah remained outside with me. After several minutes the lady returned to the front door and called Isabelle and Noah back inside and she told me she was sorry. I asked if Richard was coming to the door and she responded he was not and she proceeded to shut the door. I was so dumbfounded that I was unable to throw the paperwork into the house, I rang the doorbell again but no one responded, I went to my car where I contacted Tanya @ PSW and relayed to her what had happened. After a few moments of discussion we decided that I would attach the Subpoena to the front door with the strapping tape I carried in my car. I attached the Subpoena to the front door (which was a metal door) and proceeded to take pictures of the door with the Subpoena attached as well.

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

July 7, 2021

Bradford Murray
BRADFORD MURRAY

MARK H. COUSENS
ATTORNEY

26261 EVERGREEN ROAD
SUITE 130
SOUTHFIELD, MICHIGAN 48076
PHONE (248) 355-2150
FAX (248) 355-2170



STATE OF MICHIGAN COUNTY OF EASTERN DISTRICT

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN

AFT MICHIGAN

Plaintiff,

-vs-

PROJECT VERITAS AND MARISSA JORGE

Defendant.

Civil Action No: 17CV13292

SERVICE RETURN FOR RICHARD C SEDDON

I, Kris Holliday, being first duly sworn upon my oath does hereby depose and say that I am a person above the age of majority and I am not a party to the foregoing action or have an interest therein.

1. I made service of said *Subpoena* in the county aforesaid on the 26th day of June, 2021, at 10:44 AM by delivering a copy of the same, to RICHARD C SEDDON to wit:

a. Personally and in person at: STAMBAUGH SUB DIVISION LOT 7, 837 Sydnie Ln, Powell, WYOMING 82435

Home

Work:

Bank:

Other:

b. By leaving copies with _____, a person over the age of 14 years old at: _____

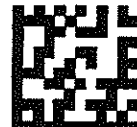
2. I WAS UNABLE TO SERVE FOR THE FOLLOWING REASON:

Physical Description:

White Male.

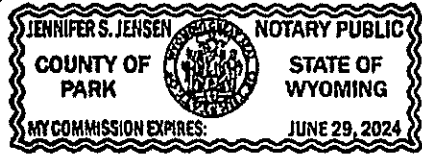
Comments: A little girl answered the door at 836 Sydnie Lane, Powell, WY. This little girl is either Richard Seddon's daughter or possibly granddaughter, (Isabelle, 4 or 5 YOA). She answered the door along with her dog, Noah. Isabelle went inside leaving the front door open. After a few moments she returned and then an older lady came to the door whom I assume was Mr. Seddon's wife. She asked what I had and I told her I had a Subpoena for Richard Seddon and she confirmed Richard resided at this property. She indicated to wait and went to go get him while Isabelle and Noah remained outside with me. After several minutes the lady returned to the front door and called Isabelle and Noah back inside and she told me she was sorry. I asked if Richard was coming to the door and she responded he was not and she proceeded to shut the door. I was so dumbfounded that I was unable to throw the paperwork into the house. I rang the doorbell again but no one responded. I went to my car where I contacted Tanya @ PSW and relayed to her what had happened. After a few moments of discussion we decided that I would attach the Subpoena to the front door with the strapping tape I carried in my car. I attached the Subpoena to the front door (which was a metal door) and proceeded to take pictures of the door with the Subpoena attached as well

Kris Holliday



as of the vehicles parked at the residence/shop and I also took numerous pictures of the property as well as the property number sign evidencing I was at the correct address.

Subscribed and affirmed, or sworn to before me in the County of Park
State of WYO this 11 day of June 2021.



Jennifer S. Jensen
Notary Public / Clerk