

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES M. MURRELL III,
Plaintiff,

v.

PATRIOT FRONT, THOMAS ROUSSEAU,
AND JOHN DOES 1-99,
Defendants.

Civil No. 1:23-cv-11802

DECLARATION OF JAMES M. GROSS

I, James M. Gross, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an associate at the law firm Foley Hoag LLP and am admitted *pro hac vice* as counsel for Plaintiff Charles M. Murrell III in the above-captioned case.
2. I am fully familiar with the matters set forth herein by virtue of my personal involvement as counsel and a review of the case file.
3. I submit this declaration in support of Plaintiff's Motion for Service on Patriot Front by Alternative Means and to Extend the Service of Process Deadline.
4. After filing the Complaint on August 8, 2023, Plaintiff caused a process server to attempt to serve Thomas Rousseau and Patriot Front at a Grapevine, Texas address publicly associated with Mr. Rousseau.
5. Attached as Exhibit A is a true and correct copy of an Affidavit of Non-Service from the process server who made that attempt.
6. Plaintiff subsequently searched publicly available resources for another address publicly affiliated with the named Defendants. That search yielded a Haslet, Texas address

publicly affiliated with Mr. Rousseau, to which Plaintiff sent a process server to attempt to serve Mr. Rousseau and Patriot Front.

7. Attached as Exhibit B is a true and correct copy of an Affidavit of Due Diligence from the process server who made four service attempts at that address.

8. On October 10, 2023, an article published by the Southern Poverty Law Center entitled *Patriot Front Leader Identified in Texas*, identified Brenner Alexander Cole as a leader of Patriot Front.

9. Plaintiff searched publicly available resources for addresses affiliated with Mr. Cole and, after identifying two such addresses (in San Marcos, Texas and Driftwood, Texas, respectively), sent a process server to attempt to serve Patriot Front at each.

10. Attached as Exhibit C is a true and correct copy of an Affidavit of Due Diligence from the process server who attempted service at the San Marcos, Texas, address.

11. Attached as Exhibit D is a true and correct copy of an Affidavit of Due Diligence from the process server who attempted service at the Driftwood, Texas address.

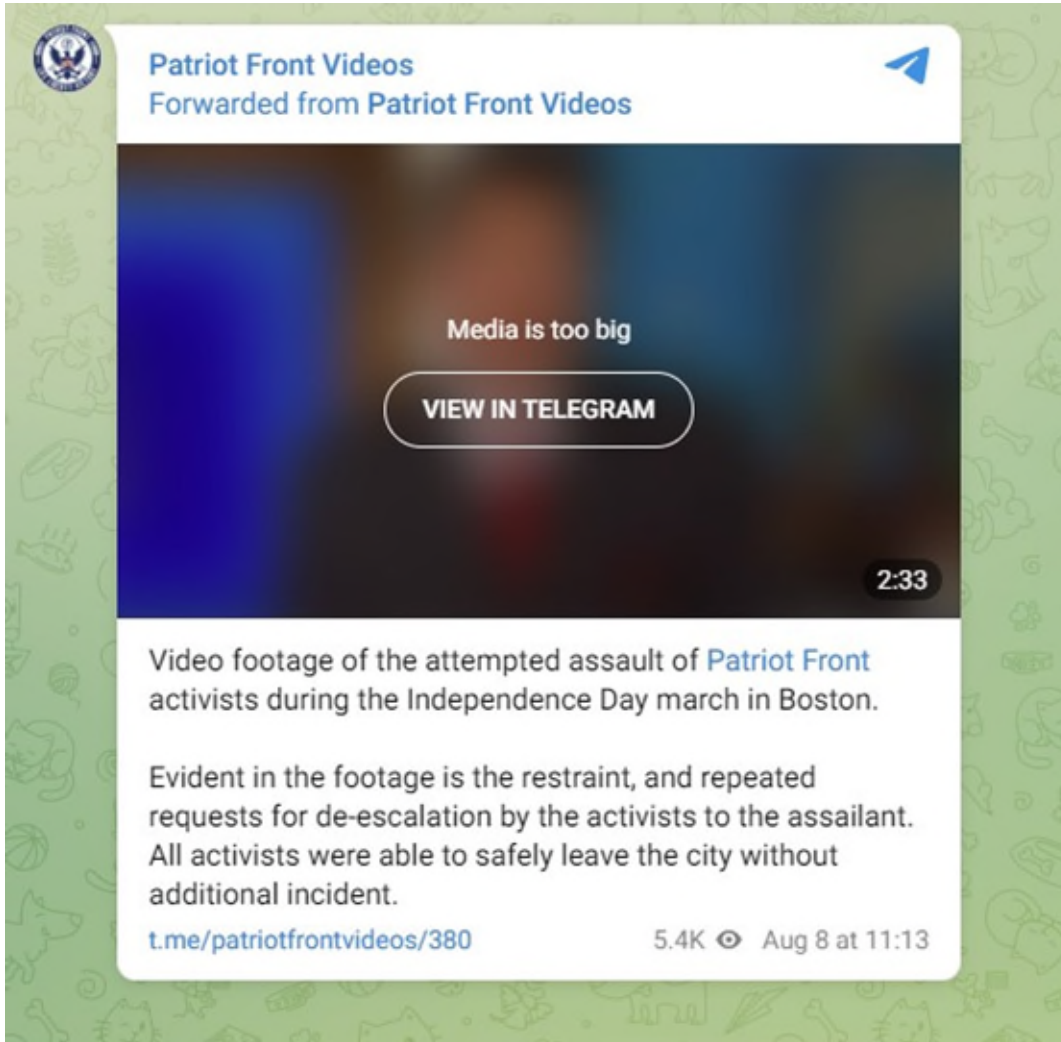
12. The process server continues to attempt to locate Mr. Cole through intermediaries.

13. Following a review of publicly available resources, Plaintiff has identified two email addresses associated with Patriot Front: patriotfront@protonmail.com and patriotfront01@gmail.com.

14. According to publicly available resources and Patriot Front's own website, Patriot Front also maintains social media accounts on the following platforms: Gab, Telegram, Bitchute, and Odysee.

15. Patriot Front regularly posts on each of those social media platforms.

16. On August 8, 2023, the day that Plaintiff filed this lawsuit, Patriot Front made a post on its Telegram account in an apparent response to this lawsuit. A true and correct screenshot of that post is immediately below.



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

Dated: New York, New York
November 2, 2023

/s/ James M. Gross
James M. Gross, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd of November, 2023, I caused a copy of the above document to be electronically filed using the CM/ECF system. To the extent necessary, Plaintiff will serve this document in accordance with this Court's ruling on the Motion

/s/ James M. Gross

James M. Gross