

Viken Nokhoudian

Webmaster (former) - Oath Keepers, Josephine County Chapter

Details of the incidents leading to my resignation from Oath Keepers of Josephine County

As I and many other Oath Keepers answered the call to defend the Sugar Pine miners, we set up two main areas of operation: the defense group at the mine site and the staging area in the town of Merlin, where personnel and assets were managed. People flocked from across the nation to personally support the operation and cash and supplies were contributed as well.

Unfortunately, there also seemed to be a great deal of wheeling and dealing going on behind the scenes by Bruce McFarland, the Assistant Coordinator for the Josephine County chapter of Oathkeepers. He repeatedly aggravated personnel by using them for his own personal purposes, blocked the Treasurers from access to financial activities and a large conflict erupted when he verbally stated that he was taking assets belonging to the Chapter, as well as intellectual property from other Oath Keepers personnel and supporters, for his own side business uses.

Additionally, Bruce was causing serious security risks to an operation under heavy surveillance and experiencing intrusion attempts from outside parties. As an experienced Server Administrator and software developer, I have been aware of these risks and have insisted Bruce correct them for the past year and a half, since long before this Operation. It became a crisis during the Operation when personnel at Staging ran around frantically alarmed that our web site and communications had been hacked. It was clear that there was suspicious behavior in our internet-based activities and I was aware of a blatant security hole by which this could be accomplished. I raised the issue to our Coordinator, Joseph Rice, but my insistence that the security holes be plugged was met by retaliation by Rice. When I provided documented proof of the security problem, Joseph's efforts to deny it escalated, including repeated (and false) assertions that I had provided no proof. His efforts to shield Bruce from scrutiny have put assets, property rights and sensitive information at risk, since Bruce also controls the Chapter's sensitive emails and other communications.

I will explain the history of my interactions with Bruce that led up to this crisis so that you can best understand my concerns. There is even more to tell than is in this rather lengthy document.

Be aware that Joseph Rice refused my every request to present this information to the Leadership team to correct the problem. I repeatedly called for a team discussion with all parties present so that I could present the evidence and we could correct the problems. Joseph threatened me with physical force to prevent me from appearing before them.

I found Joseph's stonewalling highly alarming. He repeatedly lied to cover for Bruce, even insisting, in writing, that Bruce had quit Oath Keepers completely. Joseph's final act was to hold a 'hearing' about my concerns about Bruce at which I was prohibited from appearing to present my evidence. This ensured Joseph could hand pick the people to attend, control what information would be presented, could frame it as he liked, conceal relevant facts that I possess and manage the outcome to shield the actions of Bruce. This collusion, in the face of a direct threat to security and property, is highly alarming.

PILFERING OF INTELLECTUAL PROPERTY BY BRUCE MCFARLAND

I have worked with Bruce McFarland on three projects. A pattern of behavior has emerged. This pattern became more clear over time, contributing to the crisis during the Sugar Pine operation.

1) Love to Grow

With a grant from Josephine County, I was tasked with creating a website to demonstrate the potential for a project intended to teach life skills to people of all ages to help them stay out of trouble and improve their lives. After months of development, in which all members were shown demonstrations of progress, I called a website review meeting. Bruce McFarland angrily denounced the website and insisted we would have to completely redo it, also insisting that Google warns us not to use the Responsive design techniques I had implemented. After being supportive of the site for months, this was a sudden and bizarre reversal. His claim was blatantly false, since Google recommended and ultimately required Responsive design, as I demonstrated to the group in an email that evening.

I was curious as to why he had behaved so strangely regarding the site. Later, I discovered that he had stolen a copy of it to use for his own business purposes at <http://itstheclimate.com> I also found that he did not understand Responsive design and had done a poor job of trying to modify it for his own uses. That is the most likely reason he insisted we create a non-Responsive site, so that it would be easier for him to copy and use it for himself.

I sent Bruce and the rest of the group a polite email stating that before he takes assets from the group, he must get the group's permission (Exhibit A). Bruce's response was nasty, accusing and full of rambling falsehoods (Exhibit B). It was the reaction of someone caught in the act, though he ended it with an "I just wanna be best friends" kind of statement to manipulate perceptions. He also hastily pulled the site offline, since he had copied it without permission from the group and it constituted theft of taxpayer-funded, copyrighted work.

In his email response, Bruce tried to assert that I had given him permission to take the site, which was false. Bruce had called me one evening and mentioned his site, saying that he wanted to talk about it, then made himself unavailable for that talk. After a few days of Bruce not responding, and my embroilment in other work, I forgot about it until later. By evading me, Bruce ensured I did not have the opportunity to tell him personally how improper it was. His course of action was apparently pre-planned so that he could later claim I was aware of what he was doing, deflecting responsibility to me. It is a technique designed to get "implied consent" and framing someone else for the misdeed. This is relevant to his later actions during the Sugar Pine Mine operation.

2) Koapt

Before I discovered the pilfered web site, Bruce enticed me to volunteer time on project he owned called Koapt. It was to be a copy of Facebook but supposedly more private. I worked for weeks to produce a video to attract funding for the project and, as the work went longer and longer, Bruce said that the Board of Directors were supportive my financial involvement in the project as well as my being paid to develop it at a generous rate. He said such things to inspire me to continue donating my time.

After about the fifth rewrite and reshoot, Bruce informed me that the Board wanted yet more changes. I told him that it was time for a Board meeting so I could ask them the relevant questions to finalize the video and so we could establish my involvement in the project. Bruce's demeanor changed. He assertively insisted that there would be NO board meeting and he was stopping all work on the project.

Bruce's reaction to my request for the meeting raised red flags. This is when I started to realize he was playing confidence games to get people to do things that he could gain from.

I met with one of the Board of Directors, Roy Lindsay, who informed me that there had been no Board meetings. Bruce had been lying to me to keep me working on his project. He also said he had given Bruce \$10,000 that he could ill afford. Alarmed, I asked him what development work had been done. Roy informed me he had seen a Login Page. I let him know that Bruce had shown me a mock-up of a login page that had no functionality behind it. The bigger picture was beginning to form. I later learned that Bruce has personal leverage to keep Roy silent. As Bruce tried to do to me, he apparently got Roy to compromise himself, something Roy does not want certain other persons to know.

3) Oath Keepers of Josephine County

I offered my decades of experience as a software and web developer to the Josephine County chapter of Oath Keepers, producing a site that meets modern design standards without using vulnerable back-end frameworks such as WordPress. This is key to securing the site against intruders who may introduce malware into its content.

The web site is hosted on a server run by Bruce McFarland, who has insisted to everyone that it is "secure". The server never was. I had insisted many times over the year and a half I was working for the Chapter that he secure the server. Bruce did not apparently understand server security issues and had left gaping holes such as plain-text FTP open, by which I had to connect to edit the site.

Even more alarming, I began to find copies of the Oath Keepers web site popping up in other locations, such as <http://ke7yle.com> (Bruce's ham radio call sign), <http://solarandsecuritytint.com> (a site owned by another Oath Keeper, controlled by Bruce) and others. It was clear that Bruce was again copying my work, hosted on his server, for his own outside business purposes. And he still wasn't very good at making them work properly. I sent Bruce an email and he hastily pulled down the sites I had found while apologizing. (EXHIBIT B) Caught in the act again.

There is one more site Bruce built using the original OK JoCo site, at <http://sightingscentral.com/> I did not inform Bruce I had found it so, as of this writing, it is still up.


Bruce also entices local JoCo residents to host their personal, private emails on his server, telling them it is especially secure, when he does not plug the gaping security holes that any experienced Linux Administrator knows to plug when first setting it up.

The pattern had become clear - Bruce wanted websites hosted on his server, had even at times suggested features I should add to the Oath Keepers site, so that he could have privileged access to copy and use them for his own outside purposes. This raises concerns about security of the emails hosted on his server as well. It indicates a severe security threat, as the server owner is the one improperly accessing and making un-permitted use of the materials entrusted to his care.


In addition, Bruce was in the habit of registering other people's domain names to himself. Larry Cook, for example, does not own the domain name (solarandsecuritytint.com) for his business website. Bruce 'helped' Larry by registering it to Bruce. And Bruce will not allow me to create a website for Larry, something he controls by controlling the domain name. That is literally "claim jumping" a website that by all rights belongs to Larry. In a later email, Bruce complains about having thousands of dollars in domain hosting fees every year. That's a lot of domains. It's what we call, in our business, a "domain squatter".


Even on Bruce's Facebook page, one finds a heartbreaking plea or him to stop "squatting" a woman's sites that Bruce apparently took control of for himself.

Bruce McFarland
1981 · 🌐 · 📧




Graduated from Principia High School
1981
High School

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 **Patricia Rust** Bruce, you obviously have friends...and I thought you were mine. I am going in for major spinal surgery here in Los Angeles tomorrow morning. I have been trying to contact you for one year about the passwords for my three websites which you built and maintained for me for many years but are now unable to do so because you are out of state and choose not to. PLEASE PLEASE PLEASE give me my passwords so someone can take over. This is so unfair and unfriendly to ignore me for a year. I expect more from a former Marine. Thank you, Patricia Rust



Like · Reply · May 25 at 11:57am

 Write a comment... 

This is EXTREMELY UNETHICAL behavior for people in our line of work. These character traits must be taken into consideration before entrusting such a person with highly sensitive access to information and communications during a security operation. However, Joseph Rice refused to examine the evidence even though I offered it long before the Sugar Pine operation began.

4) Rescue Responder

In December 2014, there was much talk about how to raise funds for the local Oath Keepers chapter. As a software developer, I have a patent pending system I am developing called Rescue Responder, an Early Warning System for people in crisis. I decided to bring it to Oath Keepers to allow the organization to become a partner in the project and benefit from the returns. At our last meeting in Dec. 2014, I explained to the chapter the nature of the project and my fundraising idea - that we go to National and have them put out the word. If we can get 300 Oath Keepers to donate \$50, the system will be up and running and begin generating revenue that I would share with both National and the local Chapter.

Reactions were highly favorable. Jim walked up and handed me a \$50 on the spot. Joseph said he would get me in contact with National. Bruce's eyes lit up. I should have been alarmed by that.

After a couple of weeks of no action on the part of our leadership to put me in contact with National, I asked for another meeting at the Four Seasons restaurant. In attendance were myself, Joseph Rice, Bruce McFarland and Larry Cook. I again explained the project and the benefits. All they had to do is put me in contact with Stewart Rhodes and I would make it happen. Then, Bruce repeated the same behavior pattern I had seen at the Love to Grow meeting. He began angrily shouting over me, trying to disrupt the discussion, preventing me from answering Joseph's questions. He attempted to portray himself as the one to speak to about the project and how to get it done. At that point, I realized he was up to no good. One of my emails, dated 1/25/2015, details my concerns. (EXHIBIT C)

On a later date, in the parking lot of the KAJO radio station after we had been on the air with John Chambers, I explained the whole problem to Joseph. I explained Bruce's past behavior of pilfering websites for his own uses, of hijacking domain names belonging to other people's businesses, his behavior pattern related to the LTG website that was repeated at the Rescue Responder meeting, his making other people's money disappear. I told him I wanted to show him the evidence and help him realize Bruce was likely up to no good. Joseph's reaction was dismissive. He declined to look at evidence. He seemed to not want to know his Assistant Coordinator had a pattern of pilfering other people's stuff and violating the trust we put in him with server hosting. I was astonished.

5) Sugar Pine Mine Operation

The two main areas of operation for the Sugar Pine Mine were the mine itself, an armed defensive camp, and the staging area where logistics, communications, video production and other activities were handled.

The warriors at the mine were isolated and did not see what was happening at the staging area. I became aware that there was increasing anger at Bruce for his sidestepping his duties as Assistant Coordinator and instead wheeling and dealing to create personal business opportunities out of the assets and activities of the operation.

As I sat editing video under pressure one day, a person from the Josephine County Oath Keepers came out of the PIO trailer, wandered by and mentioned in passing that Bruce McFarland was making a deal to sell him a copy of the Jo Co chapter web site, that they would be changing the chapter name and making other customizations for his Chapter's use. There went Bruce again, pilfering the work I had done to make himself side deals with it. I was working hard on a video and did not have the chance to immediately confront Bruce. He had left the staging area before I was finished.

A day or two later, and two days before the Logistics Coordinator and the Treasure both resigned, I received a late night call from Bruce. It went like this:

Bruce: "I am in contact with Stewart Rhodes and he is giving me fifteen thousand dollars to take our chapter website and make a template for the other chapters. I'm also rolling in Koapt and Rescue Responder."

Vik: "Wait a minute, you don't have permission to take my stuff. I told you to put me in contact with Stewart Rhodes."

Bruce: "Vik, Stewart told ME to make this happen. I'm doing it!"

Vik: "Stewart is not our chapter leader, Joseph is. You and I can't be having this conversation between us, Joseph needs to be in on it."

Bruce: (screaming) "That's IT! YOU'RE OUT!"

...

I interpreted that as his attempting to kick me out of the chapter, which I ignored. I informed Joseph of the call and Bruce's threatening demeanor towards myself and my property. Joseph was dismissive about it, insisting I should not take it seriously.

The next day, I informed Laurie Johansen, the other person on the patent for Rescue Responder. She refused to believe me, insisting Bruce is such a nice, helpful person there is no possible way he would be stealing our project. But at the next Oath Keepers meeting, she took the time to question Bruce and, to her astonishment, got confirmation of what he had said to me. Bruce also made a subtle threat against her to keep her quiet, which she can explain.

I reiterated my concerns to Joseph Rice, telling him that Bruce had told me outright he is threatening to steal intellectual property created by me and also belonging to another person, so he can pocket loot from Stewart Rhodes. I suggested the deal may not have been done yet but Bruce's call may only have been an attempt to get "implied consent", a strategy he had used before. I insisted that we have a small, immediate discussion with Rhodes, Bruce, Joseph, myself and Laurie to figure out whether it was even true, since Bruce lies when convenient to him. All I needed was confirmation from Rhodes that Bruce was lying, then we could drop the matter. I wanted Bruce to have the opportunity to give his side of the story in the face of the evidence. That is called DUE PROCESS.

Joseph's reaction was immediately defensive. He would not allow the conversation. I would not even be allowed to address the problem because, he insisted, we were in a crisis where bullets could be flying and people dying at any moment. There I was at Staging, where children were playing and Bruce was wheeling and dealing in the PIO trailer, realizing Joseph was using the 'crisis' excuse to block me from addressing Bruce's self-proclaimed theft of other people's stuff. He was clearly shielding Bruce's activities from scrutiny, just as the BLM was stonewalling to shield its own corrupt personnel.

I tried to keep the conversation about this limited to just Joseph Rice, Bruce, Laurie, Stewart Rhodes and myself. But, Bruce chose to email blast it to the entire leadership team, getting more and more people talking about it. Bruce's email defending his activities was half lies, half truth and a whole lot of spin. In it, he admitted to making a lucrative deal with Stewart Rhodes with the intellectual property I had created, that he would pocket the cash because he feels he "deserves it", that he would get other Oath Keepers to do further development work FOR FREE by calling it an "open source" project (while Bruce keeps the loot), that there would be kickback to the Chapter (confirming Joseph's financial interest). (EXHIBIT D)

I was horrified and disgusted that Bruce would admit profiteering from Oath Keepers' patriotism - even more so that Joseph Rice was helping him do it.

In his email, Bruce insists he deserves to pocket the money from National largely because of all the non-Oathkeepers stuff he is doing 'across the nation'. He confirms he is spending lots of money each year on domain registration fees (non-Oathkeepers). Domain squatting, a highly unethical practice, does have a cost.

Worse, in his email, Bruce claims he provides secure server hosting. HE NEVER DID. It is a lie designed to fool those who simply take his word for it. As a server administrator and programmer, I called him on it. (EXHIBIT E)

I also produced a detailed **PCI Scan Report** demonstrating the lack of security in our hosting arrangement. I sent this detailed report to Joseph Rice and I have kept a copy as evidence. Bruce immediately cut off my access to editing the website. In later emails, Joseph repeatedly insisted I had provided no evidence regarding the security problem, despite my directly sending to him the detailed security scan providing the list of holes. Joseph was lying to the Chapter leadership to cover for Bruce. The inadequate server security put our personnel, data and intel at great risk, since our communications were being actively monitored.

I insisted that the Leadership team get together to review this situation, as it constituted an immediate threat. Joseph tried to throw me off by telling me that Bruce had completely resigned from Oath Keepers, had nothing more to do with the Chapter and was leaving town. (EXHIBIT F)

Joseph's claim is proven false by Bruce's continued activities as Assistant coordinator. Joseph Rice lied again to shield Bruce and prevent the Leadership team from learning the danger Bruce poses to the operation. Using that claim, Joseph then tried to get me to take over email and web hosting, adding to my burdens while Bruce was out there apparently selling off my intellectual property. He refused to address the potential theft of property by Bruce while trying to dump Bruce's duties on me. Still willing to defend our people, I let Joseph know that the first step was to get ownership of his domain name from Bruce, otherwise there is nothing we can do to take control. That was the last I heard of it. At the time of this writing, Friday June 12 2015, Bruce McFarland still owns and controls OathKeepersJoCo.com

While I was at the Staging Area one day, the Associated Press reporter who had a stroke (Jeff Barnard) came to visit. He asked if he could personally thank the nurse, Maggie, who had cared for him while he was in distress. I shot some video of this visit. Joseph told the reporter that Maggie was not available. Strangely, Joseph intercepted Mr. Barnard at the gate and would not let him and his family come in to sit down. I did not realize until after he had left that Maggie was, in fact, at the staging area. There were hushed whispers about it and, at the time, I did not understand exactly what had happened or why Joseph had lied to the reporter.

Joseph then took the extreme step of suspending me from the local Oath Keepers chapter and banning me from coming to any Oath Keepers event. (EXHIBIT G) This was timed with the arrival of Stewart Rhodes in our county. Instead of taking advantage of the opportunity to have our ten minute conversation to get to the facts of the matter, Joseph Rice went to extremes to prevent it, threatening me with physical force should I appear at these events where Stewart Rhodes was in attendance.

Joseph Rice was that desperate to prevent a simple conversation in which we could come to an understanding about what Bruce was really doing. Later, speaking to the Treasurer who had previously resigned, as well as the new Treasurer who has also resigned, I came to realize there was a great deal more questionable activity going on that Joseph wished to conceal. They will provide their own accounts separately.

The argument about these activities, and my request for a simple ten-minute conversation with Stewart Rhodes, was CC'd to Stewart Rhodes. Jeff Ford was also included at some point. So, the Board of

Directors of Oath Keepers has been informed in writing of the alleged pilfering of property as well as the security problems at the Operation that Joseph prevented me from addressing.

Their response was silence. Non-response. Same as the BLM gave to the miners who were trying to defend their property rights and address their security issues.

- Our Chapter leadership and Oath Keepers National have stonewalled the Oath Keepers members whose property rights were under threat.
- The threat came from the Assistant Coordinator, Bruce McFarland, who leveraged his position, privilege and access to make personally lucrative deals with property belonging to others.
- When the Oath Keepers members and supporters who were wrong by Bruce demanded Due Process, a meeting with all involved parties to address the issue, Joseph Rice refused. He insisted there would be no meeting until weeks later. This ensured Bruce could accomplish his acts and the deeds would be done.
- Joseph Rice has lied and shielded the Assistant Coordinator of the Josephine County Chapter from scrutiny despite concerns about his pilfering other people's property and putting the operation at risk.

Joseph Rice finally stated in email that he will allow a Leadership team meeting about these issues, weeks after the mine operation shut down, but that I would NOT be allowed to present my evidence or witnesses regarding the actions of Bruce McFarland. He stated that because Bruce McFarland had resigned from Oath Keepers, his actions were no longer a concern to the organization. He insisted on making me the target of his "investigation" by only reviewing the emails in which we argued about the problem.
(EXHIBIT H)

Joseph Rice arranged a star chamber tribunal subject to his will alone, denying the plaintiffs the opportunity to present their evidence and make their case. He has refused to allow us Due Process to address our concerns and instead crafted a mock trial in which he chose the attendees, he hand-picked the emails to present and he framed the presentation to favor the outcome he wished, attacking us (while prohibiting us from attending) for seeking redress of grievances. He ensured Bruce McFarland was in attendance, despite his claim that Bruce had resigned, while denying me the opportunity to attend. That is an abomination to any American who actually believes in the principles behind our Oath.

That is why I resigned from Oath Keepers of Josephine County.

Joseph Rice arranged an outcome to smear the character of the plaintiffs who had first requested Due Process. He has stated that he will use his carefully arranged 'conclusions' to recommend Oath Keepers National bar the plaintiff (s) from the organization entirely.

I am, and always shall be, an Oath Keeper. However, I will only stand shoulder to shoulder with other men of honor who actually live up to that "Sacred Honor" that we pledged. We have many good people in this Chapter - but the Coordinator and Assistant Coordinator have compromised the oath we swore and the principles of the Organization.

In Service to Truth - Viken Nokhoudian

EXHIBIT A

My email to the Love to Grow group regarding Bruce taking a copy of the website

----- Forwarded Message -----

Subject: LTG Website re-use for other purposes

Date: Sat, 24 Jan 2015 19:54:25 -0800

From: Viken Nokhoudian <vikman@silcom.com>

To: John Chambers <john@musack.com>, Bruce McFarland <bruce@koapt.com>, Steph Parsons <steph@lovetogrow.org>, Roy Lindsay <roy@rcl-ventures.com>

I am writing to address a situation regarding the LTG web site.

I created this particular site design for the LTG project. It is rather distinctive in appearance, in its Responsive functionality and uses a menu system that I paid a license fee for use in my own web projects.

<http://stage4.divisionsix.com/>

Currently, Bruce has made a copy of the LTG site for his own business use, changing some of the content but maintaining the basic look and feel. His copy also implements my licensed menu system.

<https://www.itstheclimate.com/>

I do not believe this is an appropriate re-use of the work I put into the LTG project and its copyrighted web design. I suppose what further bothers me about it is that, at our last meeting in which I attempted a site review so the group could polish up the LTG site, Bruce jumped in and shouted me down, insisting we would have to scrap the site and that Google recommends against responsive design, which was simply not true. To first disparage the site work then take a copy of it for another business application is, I believe, inappropriate.

It should be a decision of the LTG group whether we want other private enterprises to make use of the system that we both paid for and donated time to create.

I am happy to do other web projects for hire or will donate my time if appropriate, if anyone wants a clean, professional, responsive site.

- V

EXHIBIT B

Bruce's response to being 'outed' for taking the Love To Grow site.

Subject: Re: LTG Website re-use for other purposes

Date: Sun, 25 Jan 2015 12:14:29 -0800

From: Bruce McFarland <bruce@koapt.com>

To: Viken Nokhoudian <vikman@silcom.com>

CC: John Chambers <john@musack.com>, Steph Parsons <steph@lovetogrow.org>, Roy Lindsay <roy@rcl-ventures.com>

Vik and everyone else...

To start off with I apologize to all for using your site design especially in light of asking permission before pillaging it and you granting permission. I had asked to borrow it for a starting point and quick launch to the itstheclimate.com site.

I will change out the itstheclimate.com site and ensure that I do not use your licensed menu system or any of the code I used as a template to build the initial site... which I would have been more than happy to buy my own license knowing that I needed to.

To address the issue of appropriate behavior... I think it would have been much smarter for you to have come to me directly instead of including the full LTG group to air the laundry... but now that you have here is what I have observed over the time we have been friends.

I would categorize you as extremely passive aggressive in your behavior and here is why I say that.

With Alex who had been a long time friend... who you full well know best for his previous life of heavy drug use... you welcomed him into your home knowing what his background had been.. I commend you for that... you started a project with him for which you blame the failure on him.

Next is your estrangement of Laurie and Paul... who in my last meeting with them are still trying to figure out what happened between you... I do agree you and Laurie had a strange friendship... but I do not accept the fact that Laurie has poisoned your ability to have a local relationship... I never observed any of the odd behaviors you said occurred... and have spent plenty of time around you and Laurie together... in fact with talks with Laurie one-on-one and with Paul they have made it clear that they would like to see you in a steady relationship. On top of that you had mentioned that Laurie had invested in to your "Rescue Responder" project... which she was happy to do... and then you, I believe purposely caused a rift to separate yourself from her. This is what I would refer to a typical business move to hostilely take over a business deal. I have observed such actions and have been taken advantage of this type of action in the past. This was textbook move on your part.

Those are my observations... and my personal assessment.

I do not want this to create a rift between us... I value our friendship... you have many great qualities and talents and I admire your integrity and your wealth of knowledge. When our friendship ends it will be my loss... be it here or the future with one of us passing.

EXHIBIT C

Subject: Not Kosher

Date: Thu, 30 Apr 2015 00:10:17 -0700

From: Viken Nokhoudian <vikman@silcom.com>

To: bruce@ke7yle.com

Bruce, I did explain that it's not okay to be 'borrowing' my site work and the menu system that I licensed for use in my own web projects. If you want to use my stuff in your own projects, it would be proper to ask. That's what we do if we're acting in good faith - we ask permission.

This is not kosher.

<http://ke7yle.com/contact.php>

Neither is this.

<http://solarandsecuritytint.com/>

The Oath Keepers site structure and menu system is for the Oath Keepers project only. It's not 'Copyright Bruce McFarland' for your own projects. It's 'Copyright Oath Keepers of Josephine County'.

You once mocked Microsoft for taking someone else's code and co-opting it for their own use, not even changing the comments. Well, you're doing the same.

- V

EXHIBIT D

My concerns about Bruce's behavior pattern, indicating he might be trying to steal Rescue Responder

Subject: Re: LTG Website re-use for other purposes

Date: Sun, 25 Jan 2015 13:52:27 -0800

From: Viken Nokhoudian <vikman@silcom.com>

To: Bruce McFarland <bruce@koapt.com>

CC: John Chambers <john@musack.com>, Steph Parsons <steph@lovetogrow.org>, Roy Lindsay <roy@rcl-ventures.com>

On 1/25/2015 12:14 PM, Bruce McFarland wrote:

I would categorize you as extremely passive aggressive in your behavior and here is why I say that.

Strange, I had thought the same of you. On two separate occasions, when I was attempting to engage a group in a technical discussion of a system I was developing, you jumped in and began shouting me down, disrupting the conversation and preventing me from engaging the group in the planned activity.

The first time was with LTG, when I attempted to hold a meeting to clean up the web site for Stephanie to use it for fund raising, so she could at least have something to show as she solicits funds for the non-profit filing. You angrily shouted me down and insisted we do not need a web site, that we would be scrapping the existing one. You assaulted my technical knowledge of web development and insisted Google recommends against the Responsive methodology I was employing. That's why I sent the email later demonstrating that Google supports my methodology.

You had also rather forcefully insisted that it would be easy for you to bring in huge amounts of funding from the Ford Foundation and we would not even need a web site, again shouting over me as I tried to get the team to simply review the site and make it presentable. I ended up doing that on the side with Stephanie, later.

In short, you insisted to the group that I do not know what I'm doing, that YOU are in a position to dictate the web development. At the same time, you were stating a whole lot of falsehoods on the technical issues. Meanwhile, I have not seen any reports of progress on funding the project.

The second time was a recent meeting in which I attempted to to discuss the Rescue Responder project with the Oath Keepers leadership. Joe asked me for technical information and, once again, you began shouting over me and asserting that I don't know what I'm doing, rather flippantly insisting you could just send an iOS developer the design for the app and get back a finished product. It might sound good to those without technical knowledge but it's not how a server-controlled app is developed. Once again, you assaulted my technical knowledge in a field where I am the experienced developer and you are not.

Your implementation of the LTG website for your ItsTheClimate business demonstrates that, as well. It's got some problems. You had first shown it to me about two months ago and you asked to meet with me to go through it. Unfortunately, that meeting never happened and I forgot about it. I was only recently

reminded of the issue by announcements about the ItsTheClimate.com business. I had planned to discuss at our meeting the fact that it was probably not a good idea to be re-using the LTG work for your own profit-making enterprise, while making it 'yours' with the copyright, that in a collaborative effort and with my help something could be arranged.

I was particularly troubled that, after trashing my knowledge and skills in front of our group, you would be making copies of my work for your own uses and copyrighting it under your own business name. That got me thinking about your trashing of my knowledge and skills in front of the Oath Keepers leadership when discussing Rescue Responder. Frankly, it's worrisome.

EXHIBIT E

Bruce confirming his side deal with Rhodes, cash kickback to Joseph for the Chapter, etc

----- Forwarded Message -----

Subject: Re: Situation

Date: Fri, 15 May 2015 09:18:46 -0700

From: Bruce McFarland <bruce@q4p.com>

To: Laurie Johnsen <vti@4securemail.com>

CC: Joseph Rice <coordinator@oathkeepersjoco.com>, Viken Nokhoudian <vikman@silcom.com>, leadership@oathkeepersjoco.com

Simple answer...

I was the one who proposed the chapter have a website... I bought the domain... hosted the domain.

I was the one who proposed the template driven system to Stewart and the attendees of the national call the OK JoCo leadership team was on.

I have provided the secure datacenter and servers which have proven thus far to be protected from prying eyes and intrusion.

Not to belittle Vik's contributions but web design is a commodity product... and a template driven system is not locked into a single design but would allow the web developers to choose a design that fits their likes.

This would be commercial endeavor and I should be paid for my efforts... since I spend a huge amount of time working on Oath Keeper projects... and that there is a huge stake involved in keeping systems secure.

There is a provision to provide monies back to National and to our OK JoCo chapter for our efforts.

Stewart did ask me to make the template driven hosting happen... and it was on a national call shortly after the start of the Sugar Pine Mine operation... I also have other Oath Keepers across the nation who have major web and system develop skills who will donate their efforts to make this happen.

I did mention this to Vik who balked on the phone and I will admit I was short with him at the time...

This will be more or less an open source development project... so the monies will be for the hosting and security provided of which a large majority will cover my costs... which are large...

I spend more that \$3000 per year in donation of just domain registration fees and have not been putting a dollar amount on the web and email hosting that I also donate. So consider this if a domain is \$15 / year and I charge \$120 / yr for web/email hosting then I have many \$10K in donations each year in donations to non-profits across the nation.

So to accuse me of edging in on something Vik did not propose... that is pure Bullshit.

B-

Sent from my MacBook Pro

On May 15, 2015, at 7:38 AM, Laurie Johansen <yti@4securemail.com> wrote:

Dear Joseph,

It was good to see you back on your feet (or foot) last night. A situation has arisen that unfortunately will need your guidance. I regret having to bring this to your attention so soon after the medical procedure.

Here is the problem:

It is my understanding that Bruce, in his capacity as the Assistant Coordinator of JoCo Oath Keepers, had contact with Stewart Rhodes on the Sugar Pine Mine site, where they discussed the website designed and made by Vik.

Stewart Rhodes was impressed by the fact that the website had never been hacked, as well as other features. He was not told that the reason why the JoCo Oath Keepers website has not been hacked is because of the way Vik designed it.

Bruce used this contact to sell himself as someone who could get the website made available in the form of a secure template to all the other OK chapters around the country. He told me he was "personally tasked" with making that happen. Stewart Rhodes offered to pay Bruce for this.

....

EXHIBIT F

I warn Joseph Rice that we have gaping holes in our intel security

Subject: Re: Situation

Date: Fri, 15 May 2015 11:45:33 -0700

From: Viken Nokhoudian <vikman@silcom.com>

To: Bruce McFarland <bruce@q4p.com>, Laurie Johnsen <vti@4securemail.com>

CC: Joseph Rice <coordinator@oathkeepersjoco.com>, leadership@oathkeepersjoco.com

On 5/15/2015 9:18 AM, Bruce McFarland wrote:

> This would be commercial endeavor and I should be paid for my efforts... since I spend a huge amount of time working on Oath Keeper projects... and that there is a huge stake involved in keeping systems secure.

THE SYSTEM IS NOT SECURE!!

Dammit, I've been telling you this for months. You have HUGE SECURITY HOLES in the system that any server manager would have plugged as soon as he installed the operating system! We DO NOT use FTP because it broadcasts the username and password in plain text. That is an enormous breach of security, right there.

Aside from the server configuration, there is also the guy running it. He is pillaging the work that is on the server and using it for his other personal projects. That is the OPPOSITE of secure. It is abuse of the trust that was given.

EXHIBIT G

Joseph tells me that Bruce has completely resigned from Oath Keepers

Subject: Re: Security

Date: Sun, 17 May 2015 11:17:19 -0700

From: Joseph Rice <joseph@recoil-usa.com>

To: Viken Nokhoudian <vikman@silcom.com>

Vik,

I do not think your understand. Bruce has resigned from Oath Keepers completely. Bruce is not in leadership, nor affiliated with Oath Keepers any longer.

We have lost our use of his servers for email & web hosting. You are webmaster, you saw it fit to bring this to a boil in the middle of a significant security operation, now you are responsible for reestablishing secure servers to you're liking as webmaster.

EXHIBIT H

Joseph suspends me from OK JoCo and warns that I will be physically blocked from attending any Chapter functions. This was timed with the arrival of Stewart Rhodes to attend our local Oath Keepers functions, ensuring I would not be able to ask him whether Bruce was engaged in these deals with him. It also prevented me from addressing the Chapter leadership to show them evidence of the problems.

Subject: Suspension

Date: Mon, 18 May 2015 13:13:03 -0700

From: Coordinator <coordinator@oathkeepersjoco.com>

To: Viken Nokhoudian <vikman@silcom.com>

CC: leadership@oathkeepersjoco.com, Jeff Ford <jeff4d2003@yahoo.com>, Stewart Rhodes <rhodeslegalwriting@gmail.com>

Vik,

Effective immediately you are suspended from Oath Keepers of Josephine County and as our chapter Webmaster.

I am launching an investigation into your allegations against Assistant Coordinator Bruce McFarland, which appear to be false and slanderous in nature. I take your allegations very seriously and you have yet to provide any written documentation or evidence supporting your position.

During the course of this investigation please do not attempt to enter the Sugar Pine Mine, Staging or attend Oath Keeper of Josephine County functions as you will be barred and turned away. Pending the outcome of this investigation will determine if you are reinstated or not in our chapter.

Your cooperation is appreciated.

EXHIBIT I

Joseph Rice informs me that there will be a leadership meeting but that I will NOT be allowed to present the evidence regarding Bruce's actions that caused this whole mess. Instead, I would be made the target, while Joseph Rice picks and chooses the evidence to use against me. Unacceptable, to anyone who believes in Due Process.

On 5/28/2015 9:53 AM, Coordinator wrote:

Vik,

We are in the operational demob process, we have to refurbish and return equipment and still have obligations with the mine.

I discussed this with Stewart Rhodes briefly and indicated he had received a lengthy email from you, was not interested in being involved in the situation as it was a chapter issue, not a national issue, and would not be responding to your email. "Due Process" does not happen over night, it happens on my schedule as I decide it will happen and you will not be denied it as you are alleging. You seem to miss the point we are involved in a larger operation and I just went through ankle reconstructive surgery two weeks ago.

I am planning on scheduling a leadership meeting in the next couple of weeks to review this situation and make a team decision. **This will only focus on your emails to various people in the chapter and leadership**, your timing of the emails in the middle of a complex operation, your conduct, your allegations against Bruce, your allegations against myself, lack of proof of your security allegation and only how this relates to Oath Keepers directly. We will only review written documentation. We will not address or review anything that is not directly related to Oath Keepers as it does not concern us.

You reference "we". I want to make it clear, there is no "we". **This is addressing you and your actions only, no one else's.** I, and the leadership team will not entertain any outside involvement in Oath Keepers of Josephine County Chapter business.

When I am able to schedule the leadership meeting, you will be notified. Until then, your suspension remains in effect.