

Declaration of Eugene Delgaudio

1. I currently serve as President of Public Advocate of the United States, Inc. (hereafter referred to as “Public Advocate” or “PA”), a nonprofit organization exempt from federal income taxation under Internal Revenue Code section 501(c)(4). I first became associated with this in 1981 as its Executive Director, before becoming its President 7 years ago.

Southern Poverty Law Center

2. Over the years, both Public Advocate and I have become the target of a focused political attack by the Southern Poverty Law Center (hereafter “SPLC”). SPLC is an extreme leftist pro-homosexual organization masquerading as an organization concerned with poverty.

3. The SPLC has adopted the tactic of designating certain Christian, pro-life, pro-family, and pro-traditional marriage groups as so-called “hate groups.” SPLC has designated PA as an Active Anti-LGBT Hate Group. http://www.splcenter.org/get-informed/intelligence-files/ideology/anti-gay/active_hate_groups

SPLC operates as a politically powerful law firm, connected to President Obama and Attorney General Eric Holder, and the Federal Bureau of Investigation listed SPLC on the U.S.

Department of Justice website as a resource until recently. <http://www.breitbart.com/Big-Government/2014/03/26/FBI-Dumps-Southern-Poverty-Law-Center>

4. I was informed by the police that at least one homosexual activist took his lead from the SPLC website when he stalked me and other members of my PA staff in Virginia. On Wednesday, August 15, 2012, that homosexual activist shot a guard at the nearby Washington, D.C. headquarters of another group which SPLC designates as a hate group – the Family

Research Council. This individual, Floyd Corkins of Herndon, Va., was convicted of domestic terrorism in connection with this assault. SPLC's recklessly branding peaceful groups as a "hate" group encouraged this mentally unstable person.

5. In 2012, lawyers from the SPLC filed suit against Public Advocate in Denver, Colorado for using a publicly disseminated photograph of two homosexuals in advertisements against two candidates for the Colorado state legislature. A federal district judge dismissed these charges by the homosexual couple, and Public Advocate made a "cost of defense" type settlement of the claim by the photographer who took the photograph. The case has now been dismissed.

6. I serve as an elected member of the Loudoun County, Virginia Board of Supervisors. SPLC also attacked me as a local elected official in a partisan political fashion.

Mark Clayton Association with Public Advocate

7. Public Advocate has opposed efforts by extreme leftist, pro-homosexual groups in Tennessee who tried to pass pro-homosexual rights legislation in Nashville, the state capitol. Some of SPLC's attacks are correlated with Public Advocate's successful grassroots lobbying in Tennessee against homosexual rights in Tennessee during the summer of 2012.

8. PA's top volunteer in Tennessee has been Mark Clayton for over 10 years. Mr. Clayton has frequently been in the news in Tennessee prior to the 2012 period promoting PA and its opposition to anti-traditional family legislation which is championed by the SPLC and other such groups in Tennessee.

9. PA has used direct mail, news conferences, letters to the members of the Tennessee House of Representatives and State Senate to oppose homosexual rights, after mentioning Mr.

Clayton's name, during the legislative session in the year 2011 and 2012 prior to the summer of 2012.

10. The SPLC used its considerable powers and budget to promote its "model" program to Tennessee school children in the exact time frame and used YouTube, social outlets, and mass media to attack legislators who considered opposition to this "model" propaganda campaign to recruit young children in the K-12 public school system to the homosexual lifestyle.

11. Demonstrations, expensive video, and grassroots-style explicitly obscene words were used in a reckless fashion to stir up emotions against pro-family legislators who opposed the use of homosexual propaganda in the classrooms by groups aligned with the SPLC which also publicly promoted its "curriculum" to Tennessee teachers and others nationally.

12. It was clear that PA and SPLC were adversarial on policy matter in Nashville, Tenn. and that the SPLC model education program directed to K-12 children would be outlawed or otherwise made illegal if the PA-supported legislation passed the State House.

13. Mr. Clayton now serves as Vice President of Public Advocate.

SPLC Response to Clayton's 2012 Primary Nomination Win

14. Mr. Clayton won the Democratic Primary for U.S. Senator in 2012, and certain forces aligned with the SPLC and the previously mentioned lobbies immediately headlined his affiliation with PA and recklessly claimed he was associated with a hate group.

15. Many public statements attacking Public Advocate and Mr. Clayton coincided with Mr. Clayton's Democratic Party primary and campaign.

16. At the urging of the police, PA did not disclose the stalking of me and our employees in order not to jeopardize the legal and criminal case against the attacker. PA remained silent and did not reveal sensitive criminal facts known to PA at the time of this threat on the lives of PA, its president, and its staff.

17. PA president Eugene Delgaudio asked for cooperation from all staff and volunteers not to reveal details of the threat to the operations of PA, and specifically called Mr. Clayton to tell him that while he could be in danger, he should not publically reveal the details, and he agreed to follow my request.

18. These events have since become public as the case has resolved itself with the conviction and imprisonment of the attacker in the related and highly publicized case of the assault on the Family Research Council in Washington, D.C. On September 19, 2013, Floyd Lee Corkins II, 29, was sentenced to 25 years in prison on three felony charges, including a terrorism offense, in the August 2012 shooting of a security guard at the Family Research Council in downtown Washington, according to an announcement on the FBI website.

DURING LAWSUIT, JUDGE ORDERED RESTRICTION

OF PERSONAL INFORMATION

19. SPLC attorneys filed suit against PA in Colorado on September 25, 2012.

20. As revealed in the attached affidavit filed in the United States District Court for the District of Colorado, Civil Action No. 12-cv-2550-WYD-KMT, the SPLC recklessly endangered PA by first claiming PA and its spokesman was a hate group or head of a hate group.

21. SPLC also recklessly endangered the president of PA by publishing his home address. (ATTACHMENT ONE)

22. This "Motion to Restrict Access" filed by PA also reveals that the FBI reported and was told about the movements of Floyd Corkins in and around PA's offices in Falls Church, Va. and at the president's restaurant in his hometown, which was in a different county than the offices of PA.

23. Mark Clayton's association with PA received national news coverage, and he was in greater danger due to this widespread news coverage. I advised him of this danger before and after his August 2012 primary victory.

24. PA asked that the court strike or restrict access to the personal address of the president due to the revelation and details of the stalking of PA's CEO and staff documented in the investigative reports of law authorities and in the PA affidavit.

25. In the order granted PA's request, in January 2013, Kathleen M. Tafaya, a U.S. magistrate, required SPLC documents filed in the court to be restricted so that the president's home address not be published.

26. This "IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO Magistrate Judge Kathleen M. Tafoya- Order" is attached also.
(ATTACHMENT TWO)

HOW THIS RECKLESS ACTION IMPACTS PA

27. This legal decision protected PA's president and his family by restricting access to the president's home address but did little to relieve staff from the reckless listing of PA's Falls Church offices as a hate group.

28. This public listing of the Public Advocate Falls Church offices continues today.

29. PA did not reveal these facts until it was clear the investigation was completed on Floyd Corkins and in our pleadings filed on November 20, 2012, revealing additional reckless actions by the SPLC.

THIS RECKLESS ACTION BY THE SPLC ENDANGERS MARK CLAYTON NOW

30. The point of this affidavit is to document the known threats to PA and its personnel, including Mark Clayton of Tennessee, particularly during his campaign as a U.S. Senator in the 2012 elections in Tennessee.

31. I believe the constant references to the SPLC designation of PA and to Mark Clayton as associated with a hate group was designed to recklessly endanger and continue to endanger PA and Mark Clayton personally.

32. The SPLC recklessly lists peaceful organizations, persons, charitable groups, authors, websites, writers, and opinion columnists as "hate groups".

33. As decided by a federal judge, it was reckless to endanger me as President of PA and I believe it was reckless to endanger Mark Clayton. During his campaign, the media assault perpetrated by certain members of the Democratic Party and state officials in any capacity assisted SPLC in this reckless behavior.


34. This information was not available to the general public due to the criminal investigation that was ongoing against Floyd Corkins and later revealed as indicated in the affidavits, motions, and order signed in Denver, Colorado in the SPLC supported legal suit.

35. This pattern of reckless behavior is no secret now and to the degree government officials and political figures assist the SPLC in orchestrating this reckless behavior, it should be condemned and sanctioned.

36. The hate group designation continues to this day and should be considered a wrongful action by most sensible people as PA engages in peaceful activities such as filing court briefs, policy papers posted online, and otherwise normal grassroots lobbying in Congress.

37. I believe there was a wrongful endangerment of a candidate for federal office and the risks to PA, its volunteers, and its staff and families continues today to the extent that anyone takes sides with the SPLC and their false designation.

Pursuant to 28 U.S.C. Section 1746, I declare, under penalty of perjury, that the foregoing is true and correct.



Eugene Delgaudio
President, Public Advocate of the United States, Inc.

June 19 2014

Date