

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re: DMCA Section 512(h) Subpoena to  
Cloudflare, Inc.

Case No.: 7:25-mc-00555-KMK

**DECLARATION OF J. DOE IN SUPPORT OF MOTION TO QUASH SUBPOENA TO  
CLOUDFLARE, INC. SEEKING IDENTITY**

Using the name J. Doe instead of my actual name, in order to protect my identity pursuant to the First Amendment, I declare and state that the following is true and correct:

1. I am the owner of the website <https://jws-library.one/>. I have personal knowledge of all matters set forth in this declaration. I make this declaration in support of my motion to quash the subpoena served by Watch Tower Bible and Tract Society of Pennsylvania on Cloudflare, Inc. I am providing this declaration under a pseudonym because I wish to protect my rights to free speech, participation in associational activities, and religious freedom. I also wish to avoid making moot the very issues which I have raised in this motion. A true and correct copy of my actual signature for this document resides with my attorneys.

2. I was raised as a Jehovah's Witness, and I have been a member of that community my whole life. Most of my friends, family members, and coworkers today are Jehovah's Witnesses. I still consider myself a Jehovah's Witness. I care deeply about that religious community. But like people of many faiths, there are aspects of the community's teachings and practices that I have questions, doubts and concerns about. I wish I could discuss my views openly with other members of the community, but unfortunately, different opinions—and even questions—are strongly discouraged. In my experience, people who voice their disagreement or doubts ultimately face rejection and disapproval from other members of the Jehovah's Witness

community, including leadership and ordinary members. Those who question the community's core teachings, persistently discuss their doubts about doctrine, or express disagreement with the leaders of the Jehovah's Witnesses organization (known as the "Governing Body") may be labelled "apostates" and be excommunicated or "disfellowshipped" from the community. When people are disfellowshipped, other Jehovah's Witnesses, including friends and family members, cut off nearly all social interactions. I have personal knowledge of people in my community who have been shunned in this way by other Jehovah's Witnesses due to the opinions they have voiced, including people with whom they had close relationships. While it is possible to be reinstated after being disfellowshipped for apostasy, in my experience, this rarely occurs.

3. Beginning in 2022, I began conducting research into the historical publications of the Jehovah's Witnesses organization. I discovered that official sources, including their website [jw.org](http://jw.org), do not provide access to many of their own historical publications. I also discovered that the organization has altered the historical record of its own publications. For example, a statement in a 1989 edition of Watchtower magazine stated that Jehovah's Witnesses' missionary work "would be completed in our 20th century," while later bound volumes and CD-ROM editions of the same issue of the magazine were altered to say "in our day."

4. To overcome this incomplete and unreliable official record and conduct research, I created an archive of publications by Watch Tower from 1890 to the present. As part of this process, I used Optical Character Recognition (OCR) software to convert images of scanned pages into searchable text files.

5. I also created text- and data-mining software tools to analyze the frequency of use of particular words, phrases, and citations to Bible verses over time in Watch Tower publications.

In order for these tools to work thoroughly and accurately, they must have access to the complete body of Watch Tower publications.

6. I used the archive and tools that I created to understand how Jehovah's Witnesses' teachings have changed over time. I discovered that what Watch Tower has written in the past is shocking, and very different from current doctrine. For example, I discovered that Watch Tower's founder in 1891 used measurements of the Egyptian pyramids to calculate the date on which the world would end, and later used numerology to calculate different dates for that event. As another example, I discovered that requests for donations and calls for obedience in Watch Tower publications have increased significantly in recent years.

7. Another reason I created the archive and tools was to provide my community with objective and unbiased information about the content of Jehovah's Witnesses' religious teachings over time. To accomplish this, I made the archive and tools I created available anonymously on the internet on the site <https://jws-library.one/> in October 2022. I shared links to the archive and tools on a message board on the Reddit platform.

8. Because I feared being disfellowshipped if my authorship of the website was revealed, I also set up reverse proxy services for the website through CloudFlare. The services provided by CloudFlare help to protect against disclosure of my identity as the owner of the website and protect the website against denial-of-service attacks. CloudFlare does not host the website.

9. Many researchers have written to me to thank me for creating the archive. Several people have asked for a copy of my archive and analytical tools that they could download and use locally.

10. In early 2025, I learned that one of those people reposted the archive I created on a different website, <https://jwlib.thewt.org/?list=publications>. Aside from providing them with a

copy of my archive and tools, I have no relationship with that person and no control over that website.

11. I have never made money in connection with the archive and tools I created, nor sought to do so, and I know of no one who has.

12. Keeping my name and identity private is necessary for me to feel comfortable expressing my views and participating in open discussions about religious teachings and practice.

13. I am a foreign citizen, residing in the country of my citizenship, but many of the people in the online community on the Reddit platform where I discuss the teachings of the Jehovah's Witnesses live in the United States, according to a map that participants in the community made and update themselves, which is available at <https://www.zeemaps.com/map?group=1671590#>. While the map itself is likely imprecise, it is consistent with my impression, based on participating in the community and reading the posts of others, that a substantial number of members live in the United States.

14. On December 19, 2025, I received notice from CloudFlare of a subpoena for identifying information associated with my user account.

15. After learning of the subpoena, I sought to protect my identity from disclosure. As I am unfamiliar with legal procedure, have never been involved in U.S. legal proceedings, and have little ability to pay for legal representation, I did not initially know how to respond. On January 12, 2026, I spoke with attorneys from the Electronic Frontier Foundation.

16. I am now moving to quash the subpoena and another subpoena that Watch Tower served on Google.

17. I believe that, should Watch Tower gain access to my identifying information, it would not only chill my speech activity, but penalize me for engaging in such speech by damaging or

destroying my relationships with friends and family who remain active members of the Jehovah's Witnesses community. Watch Tower will likely be able to use information they receive from CloudFlare to identify me because the Jehovah's Witnesses have collected lots of information about me (including my name and address) over the course of my life in the community. Because I have been part of this community my whole life, the pain of social exclusion would be overwhelming, as would the negative effects on my physical and mental wellbeing. That exclusion would be even worse because I will not feel comfortable talking about my experience openly online if my identity is revealed in this matter. Had I known that my name would be revealed, I would not have shared truthful information regarding Jehovah's Witnesses doctrine or discussed that information in an online forum. My speech activities and specifically, my dissemination of such information, will be chilled if CloudFlare releases my identifying information to Watch Tower. I have already taken down my archive. Since learning of this subpoena, I have had a general feeling of insecurity fearing that my identity could be disclosed because of the information I shared with others. I fear even more severe repercussions—in particular, social alienation from longstanding relationships with friends and family—should Watch Tower discover who I am.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed this 9th day of March, 2026.

[Signature on file with counsel]  
J. Doe