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PURSUANT TO DUCivR 5-3 AND 10-2 AND ECF 18 — NOT TO BE SERVED ON
PLAINTIFF**

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LIMITED APPEARANCE

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

BAM FRANCHISING, INC., a Delaware
corporation,

Plaintiff,

vs.

DOES 1-10,

Defendants.

**DECLARATION OF ANONYMOUS
NON-PARTY PUBLISHER IN SUPPORT
OF EMERGENCY MOTION TO
VACATE OR MODIFY ECF 6 AND TO
QUASH SUBPOENAS**

FILED UNDER SEAL AND EX PARTE

Case No. 2:26-cv-00895-DBB-DBP

District Judge David Barlow

Magistrate Judge Dustin B. Pead

I, [REDACTED], declare as follows:

1. I am over 18 years of age. I have personal knowledge of the facts stated in this declaration and could testify competently to them.
2. I **confirm** that I operate the website thebammap.com. I am the "Anonymous Non-Party Publisher of thebammap.com" (the "Publisher") in the motions filed by my counsel on my behalf in this case.
3. I am not, and never have been, a franchisee or employee of BAM Franchising, Inc. I am not, and never have been, a party to any agreement with BAM Franchising, Inc., including any franchise agreement, employment agreement, or confidentiality or nondisclosure agreement. Nor am I nor have I ever been a contractor of BAM Franchising, Inc. or a prospective franchisee of BAM Franchising, Inc. I also have never owned nor do I own a LEGO® resale company or any sort of toy or collectible company.
4. I, like the rest of the public, learned about the underlying facts of this dispute from a series of viral videos published online which today have collectively accumulated over one hundred million (100,000,000) views.
5. I have never been issued nor used an account, login, or other private credential for any computer system or service of BAM Franchising, Inc. The accounts for thebammap.com at Vercel, Inc. and GoDaddy.com, LLC are registered in my own name and use my own email address. No current or former BAM Franchising, Inc. franchisee, employee, or contractor has, or has ever had, administrative or

authorial access to thebammap.com. The Vercel and GoDaddy records will identify me and no one else.

6. Thebammap.com is non-commercial. It carries no advertising, and I do not sell access to it.
7. I registered thebammap.com on June 18, 2026 to publish reporting and analysis on matters of public concern concerning BAM Franchising, Inc. and the already brewing public controversy surrounding its franchise system, particularly motivated by
 - a. my perception of BAM Franchising, Inc.’s media and business strategy, which I developed through my demonstrably comprehensive¹ analysis of patterns of public statements made by it about the people it was in dispute with that clearly did not comport with the public record I was reading, from which I have concluded their strategy is primarily to continually weaponize misinformation and disinformation against their often structurally disadvantaged counterparties,
 - b. the arrest of Ben Schneider (a/k/a “Reckless Ben”) while attempting service of process on BAM Franchising, Inc.’s then franchise manager and current co-plaintiff in the case mentioned in ¶ 12 *infra*, Joshua Johnson,² and

¹ www.thebammap.com/updates.

² *State v. Schneider*, No. 261401094 (Utah 4th Dist. Ct.), Aff. of Probable Cause (Mar. 10, 2026) at 1 to 2 (Dkt. 7) (“[Reckless Ben] ... told me that they were trying to serve the victim legal papers”).

- c. the sweeping ex parte order that placed prior restraints on Reckless Ben's duly established constitutional rights, including freedoms of speech and movement.

I intended from the outset to make the reporting available to the public as an attempt to seek and derive the truth from the copious amounts of conflicting information generated by the opposing sides in that developing legal drama.

8. My website cites its sources, rates the reliability of its claims, publishes public corrections, and offers a right-of-reply form through which anyone, including BAM Franchising, Inc., may submit corrections or responses via an anonymous Google form found on the footer of thebammap.com's homepage which has fields for "Your Name (optional)," "Your Email (optional)," and "Your Message."³ Someone has previously submitted the right of reply form using the name "Bricks & Minifigs Legal Team" and the email "legal.team@bricksandminifigs.com."⁴
9. In gathering information for publication, I have received unsolicited information from persons who asked that their identities be kept confidential, and as a publisher, I agreed to do so.
10. I publish anonymously because I am concerned about retaliation, litigation, violence, doxxing, and harassment, which could cause me and those who live in my residence physical or emotional harm as well as reduce my ability to operate thebammap.com and otherwise conduct legitimate journalism on matters of public

³ <https://forms.gle/GJc7bKZWn6tAXcFX7>.

⁴ Anonymous submission to thebammap.com's right of reply form, name and email fields entered as "Bricks & Minifigs Legal Team" and "legal.team@bricksandminifigs.com" (July 28, 2026 at 5:53 PM MDT).

concern. My concern is derived from my interpretation of the public record, which illuminates BAM Franchising Inc.'s statements and proclivities, particularly regarding their ongoing dispute.

11. In fact, my own speech has been chilled. After I learned that BAM Franchising Inc.'s ex parte motion for expedited discovery was granted, I have withheld reporting that I would otherwise be posting if my identity were not at risk of being exposed.
12. BAM Franchising, Inc.'s dispute with Reckless Ben, a YouTube creator who covered the dispute, has produced: (a) a civil lawsuit filed May 27, 2026 that is pending before this same Court,⁵ arising from an apparently related set of operative facts, (b) an ex parte restraining order against Reckless Ben,⁶ (c) four police cases opened on Reckless Ben, at least three of which were opened by complaint of BAM Franchising, Inc.'s employees,⁷ (d) multiple arrests,⁸ (e) an armed raid executed via a search warrant on Reckless Ben's AirBnB for "stolen ... Lego merchandise" that was signed 26 minutes after it was sworn by the American Fork Police Department ("AFPD") in March 2026,⁹ (f) a 26 minute long "media release" the AFPD published about him on YouTube in late May

⁵ *BAM Franchising, Inc. v. Schneider*, No. 2:26-cv-00593-DBB-CMR (D. Utah) (removed from No. 260402353 (Utah 4th Dist. Ct.)), ECF 1 ¶ 1.

⁶ *BAM Franchising, Inc. v. Schneider*, ECF 1-4 (state court pleadings).

⁷ See Case Nos. 26AF01974, 26AF02007, 26AF02033 and 26AF02066, *see also infra* n.16.

⁸ See e.g. No. 261401094, Order to Hold With Bail (Mar. 10, 2026) (Griffin, J.).

⁹ Utah 4th Dist. Ct. Search Warrant No. 3352981 (Mar. 11, 2026) (affidavit executed 5:11 p.m., warrant signed 5:37 p.m.).

2026,¹⁰ (g) a criminal prosecution now pending,¹¹ with (h) another dropped by the prosecutor “in the interest of justice,”¹² (i) an article in the Wall Street Journal published on June 26, 2026 reporting that the dispute had triggered the raid,¹³ (j) an ongoing citizen accountability campaign regarding the police department’s behavior during and surrounding the raid before the American Fork city council, whose citizens regularly discuss the matter at its public meetings,¹⁴ and (k) a federal civil rights action filed today in this Court by four people who were with Reckless Ben during those four days in March, pleading nineteen counts under 42 U.S.C. § 1983 against the city and its police officers over the traffic stops, the detention of the process server, the raid warrant affidavit that the city’s police chief is quoted as calling “one of the biggest places where we screwed up,” and the armed raid during which Reckless Ben was arrested for a second time.¹⁵ The complainant on three of those police cases was Joshua Johnson, the “victim” in the stalking charge and one of the two verifiers of the verified complaint filed against Reckless Ben’s in this Court.¹⁶ Johnson verified the complaint alongside

¹⁰ <https://youtu.be/IcVmSQpIPRY>.

¹¹ *State v. Schneider*, No. 261401094 (Utah 4th Dist. Ct.).

¹² *Provo City v. Schneider*, No. 261000376 (Utah Just. Ct. Sept. 14, 2026) (order dismissing case without prejudice).

¹³ <https://www.wsj.com/us-news/how-a-star-wars-lego-dispute-triggered-an-armed-police-raid-in-utah-ccae9cb5>

¹⁴ See <https://www.youtube.com/@AmericanForkCity/streams> (discussing the police accountability regarding Reckless Ben at city council meetings on June 9, August 25, September 8 and September 22, 2026).

¹⁵ *Norcross v. City of American Fork*, No. 2:26-cv-01008-RJS (D. Utah filed Oct. 14, 2026), ECF 1 ¶¶ 1–5, ¶¶ 68–77, ¶¶ 115–120, ¶ 136 (“Benjamin Schneider was arrested. No items siezed. [sic]”)

¹⁶ American Fork Police Dep’t Incident Reports Nos. 26AF01974, 26AF02007 and 26AF02033 (Mar. 8 to 10, 2026) (complainant: Johnson); *State v. Schneider*, No. 261401094 (Utah 4th Dist. Ct.), Aff. of Probable Cause (Mar. 10, 2026) at 1 (Dkt. 7)

BAM Franchising, Inc.’s chief executive, Ammon McNeff.¹⁷ Johnson told an officer on body camera that “Ammon, the CEO of Bricks and Minifigs” had defined the stalking for him and “sent that to me.”¹⁸ On the day of the first arrest, Joshua Johnson put Ammon McNeff on the phone with the officer,¹⁹ the sworn probable cause statement records that Joshua Johnson and “the victim’s boss” both said there were no court cases open involving Johnson or his company.²⁰ That statement was false.²¹

13. BAM Franchising Inc.’s false accusations have already demonstrably shown outsized influence. The price for crossing BAM Franchising, Inc. is high. I am therefore afraid that if BAM Franchising, Inc. obtains my identity, they will use it to harm me in the same ways they have sought to harm others who would cross them (as described in ¶ 12, *supra*). Any reasonable person would agree.
14. The day after BAM Franchising, Inc. obtained its ex parte order against Reckless Ben,²² it continued to demonstrate its outsized influence by sending a takedown demand to his Patreon account.

¹⁷ *BAM Franchising, Inc. v. Schneider*, No. 2:26-cv-00593-DBB-CMR (D. Utah), ECF 1-4 at PageID.104 to 105 (verifications of Ammon McNeff, “Chief Executive Officer and owner of BAM Franchising, Inc.,” and of Josh Johnson, “Manager of Baker Bricks, LLC dba Salem-Baker Bricks Inc.”).

¹⁸ American Fork Police Dep’t body camera X60A9445Z (Mar. 10, 2026, 3:42 p.m.) at 9:11 to 9:17 (“That’s what Ammon, the CEO of Bricks and Minifigs said stalking was. So he sent that to me.”).

¹⁹ Incident Report No. 26AF02033 at 9 (“CONTINUED CONTACT: put an employee named ‘Ammon’ who works for Bricks & Minifigures corporate on the phone. Ammon told me that ... Benjamin Schneider has nothing to do with this and is a YouTuber who got hold of the story”).

²⁰ Aff. of Probable Cause (Mar. 10, 2026) at 2 (“I spoke in more detail with the victim and the victim’s boss who both reiterated that there were no court cases open involving the victim or the company the victim worked for.”).

²¹ *Schneider v. Johnson*, No. 26SC06134 (Or. Cir. Ct. Marion Cnty.), Small Claim (filed Mar. 4, 2026, 5:13 p.m.); Incident Report No. 26AF02033 at 10 (“I contacted the Marion County Circuit Court to verify if the paperwork Benjamin provided to me was valid. The individual I spoke with confirmed that the court case was valid and had been filed but no date had been set. Case #: 26SC06134”); *Norcross*, ECF 1 ¶ 73 (PageID.15).

²² *BAM Franchising, Inc. v. Schneider*, ECF 39-4.

15. Along with its proclivity to file ex parte motions with fervor, BAM Franchising Inc.'s own statements show that violence and doxxing are also already verifiably a part of the dispute. Its verified complaint against Reckless Ben alleges "[f]ollowing [Schneider's] Publications and viral amplification" that "Plaintiffs and associated personnel received multiple death, bomb and other threats."²³ The possibility of threats of such a magnitude as those pleaded in the verified complaint in that case being directed at me due to my identity being made public is a matter of significant concern to me.
16. Several public statements by BAM Franchising Inc.'s affiliates give me additional cause for concern. Most notably, Daniel McNeff, BAM Franchising Inc.'s former chief executive²⁴ and the current chief executive's father, claimed at 11:38 AM June 13, 2026, in a since-removed public Facebook post²⁵ that "today's version of a lynch mob could very well be You Tube [sic] investigators," and that he has, despite the fact he has "not had anything to do with Bricks & Mini Figs [sic]" for "years,"²⁶ as a consequence of the scrutiny brought by Reckless Ben's investigations, "been given multiple death threats" and had an unwanted visitor "behind [his] home with binoculars" who "shot out a big picture window that will cost thousands to replace." That someone five years removed from the dispute

²³ Verified Compl. ¶ 202, *BAM Franchising, Inc. v. Schneider*.

²⁴ BAM Franchising, Inc., Franchise Disclosure Document, Item 2, at 3 (issued Apr. 30, 2021).

²⁵ Richard Steinberg, Facebook (June 14, 2026), <https://www.facebook.com/photo/?fbid=10162297247911949> (screenshot of Daniel McNeff's public post of June 13, 2026, 11:38 a.m., reposted to a public Facebook group that uses the American Fork Police Department's name and is not affiliated with it); the same text was read in full on BJC Live Show, YouTube (June 14, 2026), https://www.youtube.com/watch?v=oDCO39t3_oU, at 1:10 to 3:21.

²⁶ See *supra* note 24, *see also id.*, Item 2 (issued Apr. 2022) (Ammon McNeff chief executive officer since October 2021).

would still be subject to the alleged threats made against him is concerning to me. More concerning to me still is his decision to pose such an ominous question at the end of his post, made even more ominous yet by the undertones of violent threats, stalking, shot out windows, and lynch mob investigations: “Who Watches the Watchers[?]” Let alone the mere idea of a “lynch mob,” but further one that could be interpreted as rhetorically directed to ‘watch the watchers,’ is extraordinarily concerning to me, the anonymous publisher behind a significant amount of information that BAM Franchising, Inc. either deems objectionable, otherwise does not want to be published, or erroneously claims to be private.

17. BAM Franchising, Inc. pleads the location of its annual conference (“BAM Con”), as a “nonpublic location” of a “private owners conference,”²⁷ and uses thebammap.com’s publication of the location as a justification for pleading that “the urgency of this matter has materially intensified.”²⁸ This assertion is false and misleads this Court. BAM Franchising, Inc. had made public the event’s location²⁹ and schedule³⁰ prior to my republication that they claim incited the concern for their safety.
18. BAM Franchising, Inc. pleads on September 25, 2026 that its Freshdesk portal contains “52 proprietary articles”³¹ which are “accessible only through individual accounts created for each franchisee during their social media setup call”³² and

²⁷ Compl. ¶ 43.

²⁸ ECF 3 at 4.

²⁹ <https://site.pheedloop.com/event/bamcon/home> (last visited October 14, 2026).

³⁰ <https://site.pheedloop.com/event/bamcon/sessions> (last visited October 14, 2026).

³¹ Compl. ¶ 9(h).

³² Compl. ¶ 13(d).

are hosted on “password-protected and secure internal systems.”³³ This, too, is false and misleads this Court. “DontFckwJustice,” an anonymous YouTuber who is also interested in this particular matter of public concern and may have similarly been targeted by likely affiliates of BAM Franchising, Inc.,³⁴ navigated to the internal Freshdesk portal during her live stream on September 26, 2026, and was able to view several articles without logging in at all.³⁵ The url now redirects to a login page.³⁶ On information and belief, any user can sign up with any account and still access the articles; I have not made the attempt.

19. BAM Franchising, Inc. is likely to disseminate my personal information. BAM Franchising, Inc.’s complaint in this case pleads that it distributed to its franchisees an internal communication about Reckless Ben,³⁷ so I believe that whatever it learns about me will reach that network and, through it, the audiences on every side of this dispute, including their extensive network of public relations professionals whom I fear will attack and harm me publicly.
20. BAM Franchising, Inc. has already tried, at least twice, to identify me and to end the site. The only communication it has likely ever sent was through the site’s anonymous correction line on July 28, 2026, which identified no error; it was a

³³ Compl. ¶ 89(c).

³⁴ DontFckwJustice, Bricks & Minifigs - BAM Marketing Director REPORTS My Video (that no one saw)? Streisand Effect, YouTube (June 20, 2026; 9:54), <https://www.youtube.com/watch?v=9iHirqPE3H0>, at 0:00 to 1:40. (Documenting a privacy complaint filed against her video about Katelyn Fagan, BAM Franchising, Inc.’s current marketing director).

³⁵ DontFckwJustice, Bricks & Minifigs is in their CRASHOUT Era? BAM SUES The BAM MAP, YouTube (live Sept. 26, 2026, 11:32 a.m. PDT), https://www.youtube.com/watch?v=OeY_N_Q1xiU, at 14:33 to 19:27.

³⁶ <https://bamfran.freshdesk.com/> (last visited October 14, 2026).

³⁷ See Compl. ¶ 18.

claim of ownership which included a demand for the names of the people behind the site.³⁸ Its chief operations officer then swore two nearly identical DMCA takedown notices to Vercel, on September 8 and September 23, 2026,³⁹ that disputed no fact, asked the host for the names behind the site and for preservation of its subscriber, payment and IP records pending legal process, and asked Vercel to treat the site as a repeat infringer, which under the host's terms is a basis for terminating an account.

21. I am submitting this declaration under seal and ex parte solely to establish my standing to challenge the subpoenas. I do not consent to the disclosure of my identity to BAM Franchising, Inc. or the public, and I do not consent to the jurisdiction of this Court for any purpose other than the defensive motions filed on my behalf.

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

Executed on October 14, 2026.

/s/ [REDACTED]
[REDACTED]

(Signed electronically by the declarant; filed by Leonard J. French with the declarant's authorization)
/s/ Leonard J. French

³⁸ ECF 8 at 4, ECF 8-2 ¶ 5, Compl. ¶ 36 at 8.

³⁹ Compl. ¶¶ 29, 30, 34.

CERTIFICATE OF SERVICE

I certify that on October 14, 2026, I filed the foregoing through the Court's CM/ECF system, which will send notice of the filing to all counsel of record, including:

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