

# LIBERTY COUNSEL

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**REPLY TO FLORIDA**

August 15, 2024

**VIA EMAIL**

The Honorable Brad Little  
Office of the Governor  
Idaho State Capitol  
PO Box 83720  
Boise, ID 83720  
[REDACTED]

RE: Idaho Army National Guard “No Christians As Commanders” Policy Recommendation

Dear Governor Little:

Liberty Counsel appreciates your commitment to protecting religious freedom and the rights of conscience of all citizens of the State of Idaho. We write to request intervention by the Office of the Governor to countermand egregious discrimination within the Idaho Army National Guard (IDARNG).

The IDARNG’s actions against the “Idaho Infantry Officer” (or “Officer”) referenced in documents within IDARNG’s possession, including the Officer’s AR 15-6 Response dated 12 AUG 2024 (“AR 15-6 Response” or “Response”),<sup>1</sup> are patently illegal. It is shocking that the Investigating Officer (“IO”) has recommended removal of the referenced Infantry Officer permanently from command of his unit on the basis of the Officer’s protected religious speech and political speech made in his private capacity.

The IDARNG IO’s “recommendations” seek to enshrine in Idaho a “No Christians As Commanders” policy. The IO has encouraged the IDARNG to adopt a policy to ferret out and scrutinize future Full-Time National Guard Duty candidates’ religious and political beliefs, determine which are “concerning” and “if substantiated,” report them to “DoD Counterintelligence” as examples of “Extremist” and “Insider Threats” for “adjudication by subject matter experts” at the Pentagon.

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<sup>1</sup> Attached hereto is a redacted copy of the frivolous Equal Opportunity (“EO”) Complaint that was the basis for the IDARNG’s resignation demand, summary removal of the Officer from command, AR 15-6 investigation, and statements made in the 3 MAY 2024 Memorandum for The Assistant Adjutant General (“ATAG”) and Commander of the IDARNG, Brigadier General J. Cole Packwood. The IO’s findings and recommendations are unsupported by the evidence. Therefore, the IO’s findings and recommendations must be unsubstantiated and dismissed entirely.

“Idaho Infantry Officer” is currently represented in the response to the AR 15-6 and EO Complaint by the law firm R. Davis Younts, LLC, with significant interest by Liberty Counsel.

Liberty Counsel requests that the Office of the Governor intervene and exercise oversight inherent to the office as Commander-in-Chief of the IDARNG. The Idaho Infantry Officer has experienced being removed from his command for over a year – with all of the long-term career-ending ramifications of that removal - on the strength of baseless and discriminatory allegations that are unconstitutional on their face and as applied, with “punishment first, due process second.”

In case you are unfamiliar with Liberty Counsel, we are a national public interest law firm specializing in constitutional law, particularly in free speech, religious freedom, and church-state matters under the First Amendment. In a significant Liberty Counsel case, on May 2, 2022, a 9-0 decision by the U.S. Supreme Court in *Shurtleff v. City of Boston, Massachusetts*, 596 U.S. 243 (2022) struck down censorship of Christian viewpoints within the public forum the City of Boston had created for flag raisings. The City of Boston violated the U.S. Constitution by allowing LGBT and transgender advocacy flags (and numerous others) on City-owned flagpoles, while censoring private Christian speech in the form of a “Christian flag” in a public forum ostensibly open to all applicants. This case was decided by the Supreme Court in our client’s favor, resulting in attorney’s fees for Liberty Counsel in an amount of more than \$2,100,000.

We have also successfully represented thousands of U.S. Military members in matters of religious freedom, including free exercise and free speech. *See, e.g., Colonel Fin. Mgmt. Officer v. Austin*, 622 F. Supp. 3d 1187, 1199 (M.D. Fla. 2022) (certifying class action and issuing preliminary injunction against U.S. Marine Corps for discriminatory COVID vaccine policies). At the successful conclusion of this litigation, the United States Department of Defense paid Liberty Counsel \$1.8 million in attorney’s fees and costs.

Under the Constitution and laws of the United States, the actions and recommendations of the IDARNG violate the Idaho Infantry Officer’s First Amendment associational rights, free speech rights, and religious free exercise rights; and his rights under the federal Religious Freedom Restoration Act (“RFRA”)(codified at 42 U.S.C. § 2000bb). “RFRA ‘operates as a kind of super statute, displacing the normal operation of other federal laws[.]’” *U.S. Navy Seals 1-26 v. Biden*, 27 F.4th 336, 346 (5th Cir. 2022) (*quoting Bostock v. Clayton County*, 140 S. Ct. 1731, 1754 (2020)).

Closer to home, the IDARNG’s actions violate the Constitution and laws of the State of Idaho. The Idaho Constitution expressly protects the Infantry Officer’s rights to freedom of speech (“Every person may freely speak, write and publish on all subjects, being responsible for the abuse of that liberty.” Idaho Const. art. I, § 9); practice his religion; engage in political rights and privileges (like running for public office), including expressing religious and/or political beliefs against “acts of licentiousness,” and speak in opposition to “pernicious practices,” or other acts “inconsistent with morality.”

**The exercise and enjoyment of religious faith and worship shall forever be guaranteed; and no person shall be denied any civil or political right, privilege, or capacity on account of his religious opinions; but the liberty of conscience hereby secured shall not be construed to dispense with oaths or affirmations, or excuse acts of licentiousness. . . or other pernicious practices, inconsistent with morality or the**

peace or safety of the state; nor to permit any person, organization, or association to directly or indirectly aid or abet, counsel or advise any person to commit the crime of bigamy or polygamy, or any other crime. . .

See Idaho Const. art. I, § 4 (emphasis added). And as the state “military [is] subordinate to the civil power” (Idaho Const. art. I, § 12), the IDARNG leadership is subordinate to the Office of the Governor. The IDARNG’s actions here not only violate the Idaho Constitution; they also violate Idaho’s Free Exercise of Religion Protection Act (FERPA), Idaho Code § 73-402 *et seq* (“(1) Free exercise of religion is a fundamental right that applies in this state...(4) A person whose religious exercise is burdened in violation of this section may assert that violation as a claim or defense in a judicial proceeding and obtain appropriate relief against a government. A party who prevails in any action to enforce this chapter against a government shall recover attorney's fees and costs”).

Soldiers who identify as LGBTQ are required to tolerate Christians in the military workplace and may not file false EO Complaints or other charges against superior officers (or subordinates) because they disagree with protected religious or political speech. False charges like these interfere with good order and discipline. Here, the dichotomy between “speech for me, but not for thee” could not be more evident: the baseless and discriminatory AR 15-6 investigation stems from a false EO complaint filed against the Officer by a subordinate senior enlisted man, because the officer had the temerity to speak his religious and political beliefs in public outside of the military context.

The subordinate senior enlisted man filed his frivolous EO complaint (in which the NCO self-identifies as homosexual) on the basis of the Infantry Officer’s religious views, religious speech and political speech on matters of public concern. See attached. Among other things, the NCO cites that the Officer was “[t]alking about ...returning to what he feels is the truth, decency, and morality.” The man falsely claims that the examples of the Officer’s speech showed “just how much [the Officer] truly hates the LGBTQ community.” The Officer actually believes all people are made in God’s image and have inherent dignity and are worthy of respect. He is committed to serving those under his command, regardless of political or religious disagreements. He cares deeply for his fellow Soldiers and citizens and would give his life in defense of his Nation and State, if necessary.

Incredibly, the senior NCO actually claimed the Officer “didn’t want to talk or communicate with me” (the Officer states the opposite is actually true<sup>2</sup>) within six business days of taking command of a geographically distributed National Guard unit, and so the man “decided” to do “a quick Google search” “to see who my new commander was” and “see if I could find out why he didn’t want to talk...with me” and then “found” examples of the Officer’s speech.

The Officer’s speech indeed expressed rather unremarkable (and widely held) Christian religious viewpoints and political viewpoints on matters of “truth, decency, and morality,” including human sexuality. The Officer also opposed “pernicious practices” like the sexualization, sterilization and mutilation of children. Some of the Officer’s speech was made in the course of political campaigns. All of it is First Amendment-protected speech. All was made in the Officer’s private, non-military

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<sup>2</sup> During the Officer’s initial meeting with the group of NCOs, including the Complainant, the Officer solicited feedback from all present, including the complainant. This NCO chose not to talk to the Officer, either in the meeting, or after. Other NCOs approached the Officer and provided feedback; but not the complainant.

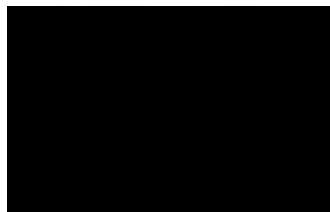
capacity. Some of the political positions the Officer publicly supported have now become the law of the State of Idaho, or nearly so.

Liberty Counsel accordingly adds our voice to those of the Idaho Infantry Officer and his counsel, in requesting that as Commander-in-Chief, you require the Idaho Army National Guard to:

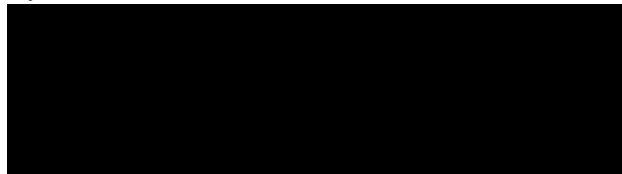
- 1) “unsubstantiate” the discriminatory IO findings and recommendations;
- 2) reject the “No Christians As Commanders” policy; and
- 3) require the IDARNG to take all necessary steps to restore the Officer’s career, which has been harmed by over a year’s worth of “process as punishment,” including dismissing the meritless EO complaint.

We hope to receive a favorable written response by August 30, 2024. If we do not receive a favorable response, Liberty Counsel will conclude we must take additional steps to prevent continuing irreparable harm to the cherished liberties of the Idaho Infantry Officer.

Sincerely,



Senior Litigation Counsel  
Liberty Counsel




Idaho Affiliate Attorney  
Liberty Counsel

Attachment

c.

**Via Email**



The Honorable Raúl R. Labrador  
Idaho Office of Attorney General



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<b>Discrimination Complaint in the Army and Air National Guard</b> For use of this form see CNGBM 9601.01, the proponent agency is NGB-EO.		(SEEM Use Only) Filing State/Territory: _____ NGB Case Tracking Number: _____	
<b>PRIVACY ACT STATEMENT</b>			
Authority: 42 U.S.C., Chapter 21, Subchapter V Principal Purpose: To document allegations of discrimination in the National Guard (NG) Routine Uses: None Disclosure: Voluntary. However, failure to complete all portions of this form could affect the timely processing, or result in the rejection or dismissal of your complaint.		<input type="checkbox"/> IRR Date: _____ <input type="checkbox"/> FRR Date: _____ <input type="checkbox"/> ADR Date: _____	
<b>INSTRUCTIONS</b>			
<b>PART I - TO BE COMPLETED BY COMPLAINANT</b> Submit to Your EO State Representative			
All NG members serving in Title 32 status, to include NG technicians in a military pay status who believe they have been discriminated against based on race, color, national origin, religion, sex-gender, or sexual orientation, or who believe they have been the victim of sexual harassment, or of reprisal for prior engagement in the discrimination complaint process or related activity, may file a request to resolve discrimination allegations.  You are encouraged to discuss the complaints with and to seek assistance from your immediate supervisor, unit commander, members of the chain of command or EO office staff. Fill out Part I of this form and file the complaint within 180 days of the date of the alleged discrimination or the date that you became aware of the discriminatory event or action. The complaint should be filed with the unit commander (if the commander is not the alleged discriminating official) or with your unit EO representative. You may file with any other commander in the chain of command, the Adjutant General, the National Guard Bureau, or Inspector General Office. However, regardless of where the complaint is filed, it will be referred to the lowest applicable command level for action.			
<b>1. COMPLAINANT</b>			
a. NAME (Last, First, MI) <b>COMPLAINANT</b>		b. RANK <b>SFC</b>	c. COMPONENT (ARNG/ANG) <b>ARNG</b>
d. POSITION <b></b>		2. SEX-GENDER (M/F) <b>M</b>	
3. RACE <b></b>		4. NATIONAL ORIGIN <b>U.S. CITIZEN</b>	
5. HOME ADDRESS (Including Zip Code) <b></b>		6. TELEPHONE NUMBERS a. BUSINESS <b></b> b. HOME <b></b>	
7. ACTIVITY OR UNIT IN WHICH ALLEGED DISCRIMINATION OCCURRED <input checked="" type="checkbox"/> COMPANY SPECIALIZATION <b></b> LOCATION <b></b> ID <b></b>		8. ARE YOU (Check One) <input type="checkbox"/> PART TIME MILITARY MEMBER <input checked="" type="checkbox"/> AGR TITLE 32/ADOS TITLE 32 <input type="checkbox"/> APPLICANT FOR NG/AGR MEMBERSHIP <input type="checkbox"/> FORMER MILITARY MEMBER <input type="checkbox"/> BENEFICIARY OF NG	
<b>9. ALLEGED DISCRIMINATING OFFICIAL (ADO)</b>			
a. NAME (Last, First, MI) <b>INFANTRY OFFICER</b>		b. RANK/TITLE <b>/Company Commander</b>	
<b>10. REPRESENTATIVE (If any)</b>			
a. NAME (Last, First, MI) <b></b>		b. ADDRESS <b>LOCATION ID</b>	
<b>11. CHECK BELOW THE BASIS (Reasons) FOR ALLEGED DISCRIMINATION</b>			
<input type="checkbox"/> R RACE (Check Your Race) <input type="checkbox"/> Black or African American <input checked="" type="checkbox"/> White <input type="checkbox"/> American Indian/Alaska Native <input type="checkbox"/> Asian <input type="checkbox"/> Native Hawaiian/Pacific Islander			
<input type="checkbox"/> C COLOR (State Your Color) _____			
<input type="checkbox"/> L RELIGION (State Your Religion) _____			
<input type="checkbox"/> S SEX-GENDER (Sexual Harassment) (Check Your Gender) <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female			
<input checked="" type="checkbox"/> X SEXUAL ORIENTATION (Specify) <b>GAY/HOMOSEXUAL</b>			
<input type="checkbox"/> O REPRISAL (Based Upon EO Activity) <input type="checkbox"/> Yes <input type="checkbox"/> No			
<input type="checkbox"/> N NATIONAL ORIGIN (State Your National Origin or National Group) (Specify) _____			



12. CHECK FOR SPECIFIC ALLEGATIONS AND ISSUES			
<input type="checkbox"/> Appointment/Enlistment	<input type="checkbox"/> Evaluation/Appraisal	<input type="checkbox"/> Reassignment	
<input checked="" type="checkbox"/> Assignment of Duties	<input checked="" type="checkbox"/> Harassment	<input type="checkbox"/> Retirement	
<input type="checkbox"/> Awards/Decorations	<input checked="" type="checkbox"/> a. Non-Sexual	<input type="checkbox"/> Time and Attendance	
<input type="checkbox"/> Disciplinary Action	<input type="checkbox"/> b. Sexual	<input type="checkbox"/> Training/Education	
<input type="checkbox"/> Duty Hours	<input type="checkbox"/> Promotion/Non-Selection	<input type="checkbox"/> Other	

13. STATE ALLEGATION AND ISSUES (Explanations, background, and evidence can be attached as supporting material; they are NOT issues.)

Issues:    A. Number each issue.  
               B. Briefly list the alleged act of discrimination, the basis, and the date(s) it took place.  
               C. Indicate the name(s) of the alleged discriminating official(s) (ADO).

SAMPLE: I was discriminated against on (date) on the basis of (Race, Religion, or other basis) when (name the ADO) and briefly list the discriminatory event(s) or personnel action(s). Attach additional blank sheets, if necessary.

1. I feel like I have been discriminated against because of my sexual orientation and that is has a hostile work environment during the time of 6 July 2023 to current from my new Company Commander, **INFANTRY OFFICER** I feel that I was intentionally left out of key conversations about my area of operations due to my sexual orientation.    SEE ATTACHED DOCUMENT
2. I feel that **INFANTRY OFFICER**'s involvement with this extremist/hate group has created a hostile work environment and that I'm being discriminated against because of my sexual orientation. I have articals, facebook posts and posts from this groups website that prove his active involvement in this organization. Dates range from 2020 to present.    SEE ATTACHED DOCUMENT
3. I feel like this following article and screen shots from **INFANTRY OFFICER**'s Facebook page further shows that i have been discriminated against because of my sexual orientation and that it has caused a hostile work environment. The dates for these offenses range from 2020 to current. I have provided links to articles and screenshots for this.    SEE ATTACHED DOCUMENT

14. WHAT CORRECTIVE ACTION DO YOU WANT TAKEN TO RESOLVE YOUR COMPLAINT?

TO HAVE **INFANTRY OFFICER** IMMEDIATELY REMOVED AS MY COMMANDER AND THEN TO HAVE **INFANTRY OFFICER** REMOVED FROM THE IDAHO ARMY NATIONAL GUARD SO THAT HE NEVER HAS COMMAND AUTHORITY OVER ANYONE AGAIN.

15a. SIGNATURE OF COMPLAINANT	15b. DATE
<b>COMPLAINANT</b>	20230717
16. OFFICIAL RECEIVING COMPLAINT	
a. NAME	b. TITLE
c. SIGNATURE	d. DATE

PART II - COMPLAINT MANAGEMENT PROCESSING					
TO BE COMPLETED AT THE LOWEST APPLICABLE COMMAND LEVEL					
COMPLETE AS APPROPRIATE					
1. WHEN DID YOU RECEIVE THE COMPLAINT?					DATE (YYYY/MM/DD)
2. WAS THE COMPLAINT					
a.	Accepted	<input type="checkbox"/>	All	<input type="checkbox"/>	In Part
b.	Referred	<input type="checkbox"/>	All	<input type="checkbox"/>	In Part
					TO WHOM?
c.	Dismissed	<input type="checkbox"/>	All	<input type="checkbox"/>	In Part
					(State Reason)
3. AFTER REVIEW OF THE LEADERSHIP INQUIRY REPORT I FIND THAT YOUR ALLEGATIONS ARE:					
<input type="checkbox"/> Substantiated <input type="checkbox"/> Unsubstantiated <input type="checkbox"/> Discrimination Undetermined					
4. DID YOUR NOTICE OF PROPOSED RESOLUTION (NPR) CONCUR WITH THE FINDINGS OF THE INQUIRY OFFICIAL?					<input type="checkbox"/> Yes <input type="checkbox"/> No
5. NAME/DATE NEXT HIGHER LEVEL COMMANDER REVIEWED NPR:					b. DATE (YYYY/MM/DD)
a. NAME (Last, First, MI)					
6. DID THE JUDGE ADVOCATE REVIEW THE CASE?					DATE (YYYY/MM/DD)
<input type="checkbox"/> Yes <input type="checkbox"/> No					
7. DID THE SEEM REVIEW THE CASE?					DATE (YYYY/MM/DD)
<input type="checkbox"/> Yes <input type="checkbox"/> No					
8. DID THE ADJUTANT GENERAL (or designated representative) REVIEW THE CASE?					DATE (YYYY/MM/DD)
<input type="checkbox"/> Yes <input type="checkbox"/> No					
9. DATE YOU MET WITH MEMBER AND PROVIDED THEM WITH NPR:					DATE (YYYY/MM/DD)
10. COMPLAINANT'S ELECTION TO THE NPR'S PROPOSED RESOLUTION AND REMEDY:					
[    ] Accept the Proposed Resolution and Remedy.					
[    ] Withdraw my State Informal Resolution Request.					
[    ] File a NGB Formal Resolution Request					
a. SIGNATURE OF COMPLAINANT					b. DATE (YYYY/MM/DD)
11. THIS FORM, THE NPR, THE LEADERSHIP INQUIRY REPORT, AND ANY ACCOMPANYING DOCUMENTATION WAS FORWARDED TO NGB-EO-CMA ON:					DATE (YYYY/MM/DD)
12. REMARKS:					
10a. SIGNATURE OF COMMANDER					10b. DATE (YYYY/MM/DD)

**PART III - NGB FRR PROCESSING**FOR NGB-EO-CMA USE  
ONLY

1. DATE FRR WAS RECEIVED FROM THE STATE:	DATE (YYYY/MM/DD)
2. PRELIMINARY REVIEW OF NGB FRR:	<input type="checkbox"/> ACCEPT <input type="checkbox"/> DISMISS <input type="checkbox"/> REMAND
3. IF ACCEPTED: DATE INVESTIGATION REQUESTED: _____ DATE INVESTIGATION OFFICER (IO) APPOINTED: _____ NAME/RANK OF IO: _____ CONTACT INFORMATION FOR IO: EMAIL: _____ DATE INVESTIGATION WAS COMPLETED: _____ OFFICE PHONE: _____ DATE REPORT OF FINDINGS RECEIVED: _____ CELL PHONE: _____ DATE NGB NPR ISSUED: _____	
4. IF DISMISSED: DATE NOTICE OF PROPOSED DISMISSAL SENT:	DATE (YYYY/MM/DD)
5. COMPLAINANT HEARING REQUEST: YES _____ NO _____	DATE (YYYY/MM/DD)
6. STATE HEARING REQUEST: YES _____ NO _____	DATE (YYYY/MM/DD)
7. REMARKS:	



Subject: Formal Complaint of Sexual Orientation Discrimination and hostile work environment

To whom it may concern,

I am writing this letter to formally lodge a complaint against **INFANTRY OFFICER** for sexual orientation discrimination and a hostile work environment. My name is SFC **COMPLAINANT** and I identify as gay/homosexual.

I feel like I have been discriminated against because of my sexual orientation and that is has caused a hostile work environment. The purpose of this complaint is to bring to your attention several instances in which I believe I have faced discriminatory treatment based on my sexual orientation. I am deeply concerned about the hostile and prejudiced behavior I have experienced, which has adversely affected my well-being, work performance, and overall sense of belonging within the workplace/organization.

I believe the following incidents constitute sexual orientation discrimination and a hostile work environment.

1. **INFANTRY OFFICER** is the new command for the **X** Company **SPECIALIZATION** in **LOCATION** Idaho and his official start was on 5 July 2023. I came back to work on 6 July 2023 from paternity leave. Since then, many very disturbing facts about him have come to my attention on 13 July 2023.

**INFANTRY OFFICER** has introduced himself to everyone on the **X** company team except me and my team in **LOCATION**, that's only a 45 min drive from the **LOCATION** office. I talked with other members of the **SPECIALIZATION** team, and they told me that **INFANTRY OFFICER** had reached out to them many times about different ideas that he has for the area in **LOCATION** and ideas for the **LOCATION** area. I am the team leader in charge of the **LOCATION** area so I kept asking why he wouldn't just call and talk to me directly. On 7 July 2023 all of **X** company had a team meeting at the **LOCATION** armory. I sat right next to **INFANTRY OFFICER** during this meeting. So, after hearing that he was communicating with other members of **X** company and not myself, I got curious as to why. I remembered that he ran for Mayor in **LOCATION** and he also ran for a Senate position for the State of Idaho. I decided to do a quick Google search to see who my new commander was and see if I could find out why he didn't want to talk or communicate with me. That is when I found all this information that is listed below.

**LOCATION**

**LOCATION**  
**LOCATION**  
**LOCATION**.html

In this article you will read that **INFANTRY OFFICER** is identified as one of the organizers to a protest at a public library in **LOCATION** where Drag Queens were reading to children. As one of the organizers **INFANTRY OFFICER** has participated in the orchestration of the inclusion of an extremist hate group called Mass Resistance against the LGBTQ community. This shows the ties the **INFANTRY OFFICER** has with this hate group. Not only did he bring the Extremist/hate group, but he also participated in the protest with this group, working alongside this group to protest things that he believes to me immoral. **INFANTRY OFFICER** is quoted saying in the article that "It's a public event at a public venue that's owned by the city, so they can't tell anyone they can't come," **INFANTRY OFFICER** points out. "We just show up, fill up all the seats so the room's at max

capacity, and then prevent young children from being brought in and being exposed to this sexually inappropriate content." He is also quoted saying how he believes these things to be immoral.

2. I feel that INFANTRY OFFICER's involvement with this extremist/hate group has created a hostile work environment and that I'm being discriminated against because of my sexual orientation.

The following link is to the Mass Resistance extremist/hate group page and a link to their mission statement:

MassResistance

<http://www.massresistance.org/AboutUs.html>

<https://www.massresistance.org/docs/> [REDACTED]

In the link listed above you can see INFANTRY OFFICER on the Mass Resistance website. They identify him, with the pictures that are posted, as being a member of the LOCATION Mass Resistance group. In the above post INFANTRY OFFICER is seen as an influential leader in the Mass Resistance group and is giving a presentation during this meeting.

You can clearly see from these links above that this organization is not friendly to the LGBTQ community and can only be defined as an extremist/hate group.

3. I feel like this following article and screen shots from INFANTRY OFFICER's Facebook page further shows that I have been discriminated against because of my sexual orientation and that it has caused a hostile work environment.

LOCATION [REDACTED] [REDACTED] [REDACTED] [REDACTED]

In this article you will see that in January of 2020 INFANTRY OFFICER is addressing a local militia in STATE.

As evidence that INFANTRY OFFICER holds extreme views, the officials referenced a DATE news article out of LOCATION, STATE, covering INFANTRY OFFICER's speech to a STATE militia. They've also cited INFANTRY OFFICER's statements from local political forums in which he vowed he wouldn't follow court rulings or state, or federal edicts deemed by local leaders to violate the rights of people.

"When INFANTRY OFFICER says, 'I will not uphold any law that I feel to be immoral,' that's not the Constitution, which he says he's all about the Constitution," NAME said. "My concern is I don't want any one person, I don't care who it is, deciding what's moral and inciting violence. ... I'm all about the Second Amendment, but when you're talking about using the municipal police against the federal government, that's a whole nother level of crazy."

In that quote INFANTRY OFFICER says that he will not uphold any law that he feels to be immoral. He feels that gay marriage and gay rights are immoral. So, what is INFANTRY OFFICER willing to do and what laws and regulations is he willing to break. Any federal or state law that HE FEELS is immoral he will not uphold that law.

The attached pictures are the screenshots that show **INFANTRY OFFICER** on the Mass Resistance main website and on their main Facebook page.

11:34



23%



Idaho Library Board flees meeting to avoid outraged...



massresistance.org



**MassResistance**

Pro-Family Activism



**Local Idaho library board members avoid outraged MassResistance citizens by skipping scheduled meeting, causing cancellation. So citizens hold a "town hall" meeting there!**

*Hundreds of graphic, obscene children's books found in library.*

*But arrogant city official tells parents that there is "no pornography" in the library.*

March 20, 2023





11:38

22%



Idaho Library Board flees meeting to avoid outraged...

massresistance.org



***there is "no pornography" in the library.***

March 20, 2023



*After the library board suddenly cancelled its meeting, the citizens stayed and held their own "Town Hall" there to air their grievances.*

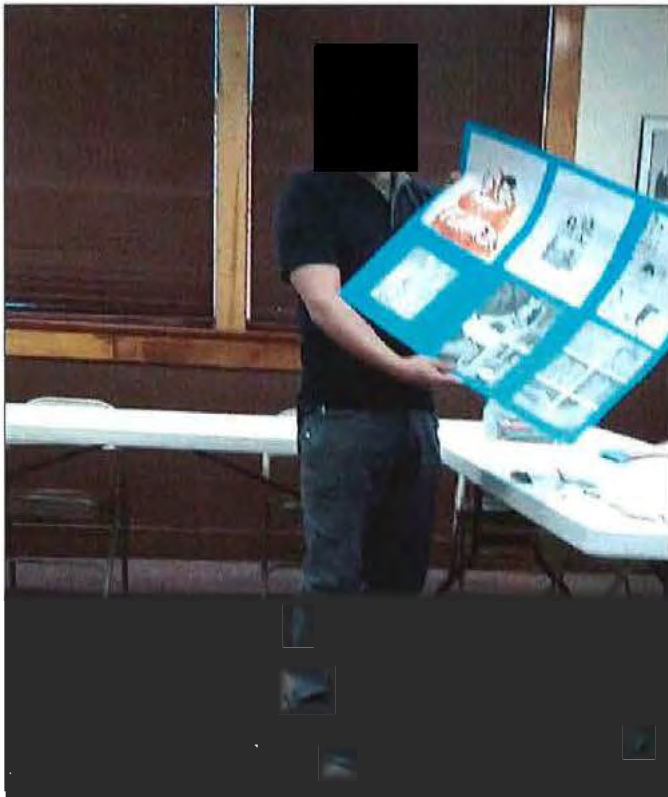
There have been a lot of great things going on in Idaho!

On January 17, 2023, about 30 local parents from our **LOCATION** Idaho MassResistance team went to the local Marshall Public Library Board of Trustees meeting to air their grievances during the public comment section. It was one of the largest groups of citizens in memory to come to a library board meeting there.

**Outraged over large amount of pornographic children's books**

X Idaho Library Board flees meeting to avoid outraged...  
massresistance.org

It was really a great Town Hall! They talked about the **three hundred books** they had found in the library – designed to give toxic and degrading messages to children, much of it extremely sexually obscene. It seemed clear, they said, that the intent is to normalize sex to children, essentially grooming them for abuse. Also, many of the children's books are about destroying the idea of the traditional family.



11:34



23%



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6

5 comments • 1 share



Like



Comment



Share



MassResistance



Mar 20 · 🌐

Local Idaho library board members avoid outraged MassResistance citizens by skipping scheduled meeting, causing cancellation. So citizens hold a "town hall" meeting there!

SEE:

<https://www.massresistance.org/docs/gen4/23a/ID-Library-Board-flees-from-parents/index.html>



17

3 comments • 1 share



Like



Comment



Share



MassResistance



Mar 14 · 🌐

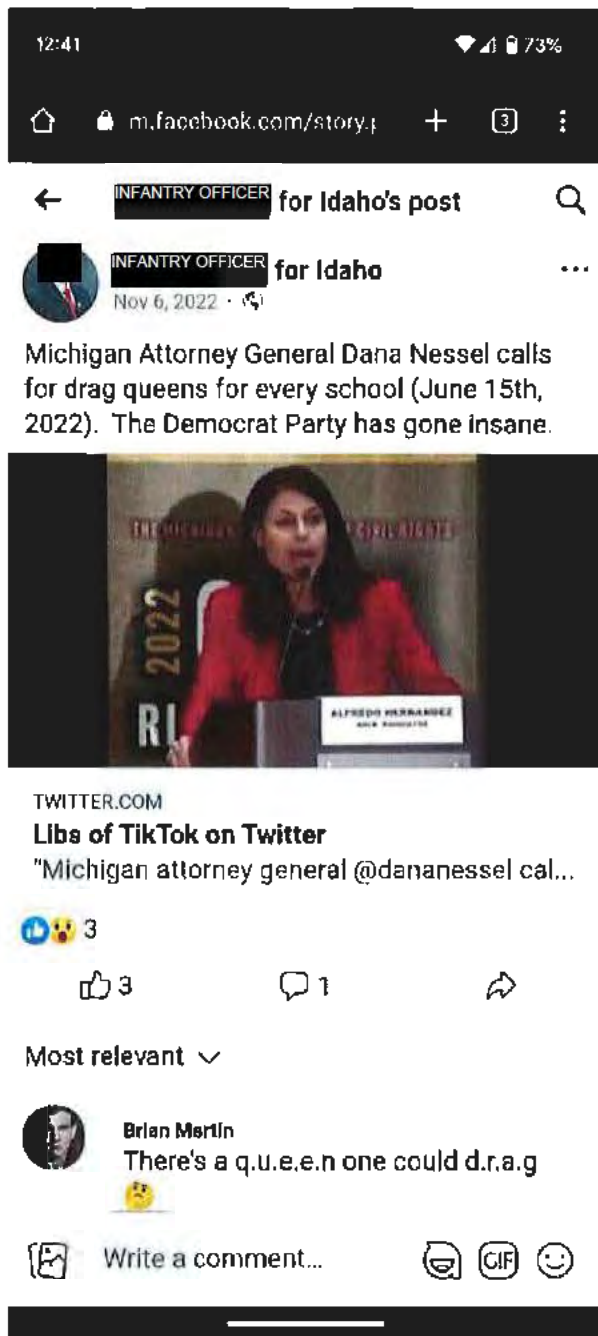
Fox News quickly removes attack on MassResistance



The attached pictures below are screenshots from [REDACTED] INFANTRY OFFICER's personal/political social media page. Showing just how much he truly hates the LGBTQ community.



Again saying how immoral he believes the LGBTQ community to be.



Inciting violence against the attorney general for Michigan and attacking the whole Democrat party.

12:53

71%



INFANTRY OFFICER for Idaho

[Message Us](#)



INFANTRY OFFICER for Idaho

...

Aug 6, 2022 · 🌐

Radical gender theory in all its manifestations must be defeated. The Woke Communists will not tolerate you. They want to destroy our way of life. Without victory, there can be no peace.

## DAILY WIRE

### NEWS

# 80-Year-Old Woman Banned From Community Pool After Complaining Man Watching Little Girls Undress In Shower Room: Report

By Hank Berrien

Aug 5, 2022 DailyWire.com



👍👎👉 6

👍 6

💬 2

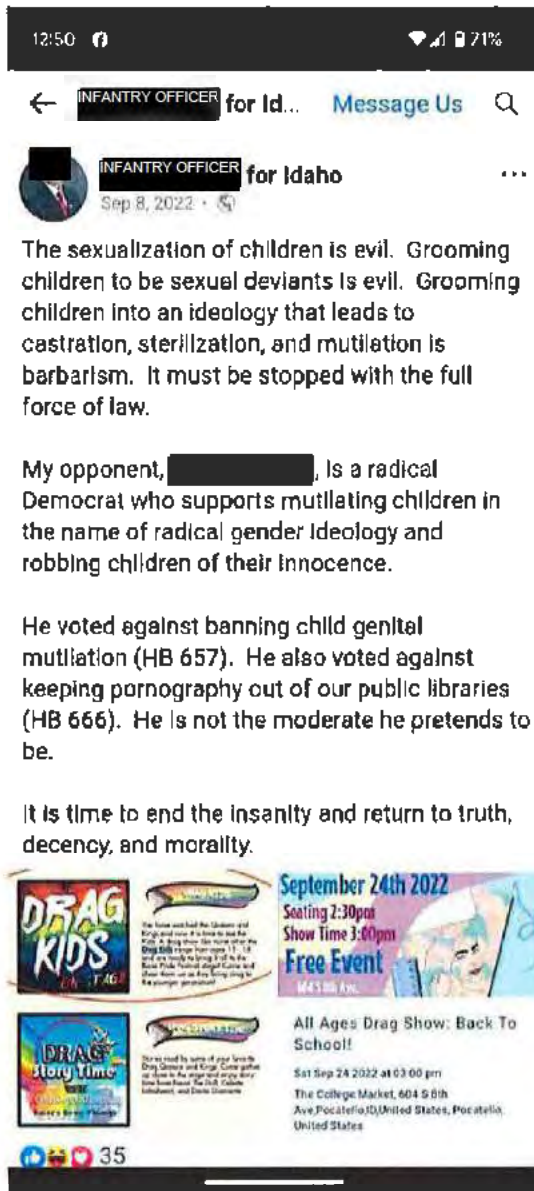
🔗 1




INFANTRY OFFICER for Idaho

...

Inciting violence




Talking about the returning to what he feels is the truth, decency, and morality

 **INFANTRY OFFICER** for Idaho [Message Us](#) 



**INFANTRY OFFICER** for Idaho

Feb 21, 2022 · 

The most destructive aspect of "transgender" Ideology is the constant demand that we deny reality. Only the truth can set people free, whereas lies eventually become chains.



THEBLAZE.COM

**Transgender swimmer continues dominating at Ivy League Championships, winning 200 free by more ...**


The win comes one day after Thomas had won the ...

  5

 5




**INFANTRY OFFICER** for Idaho

Feb 21, 2022 · 



**[REDACTED]** for Idaho

Feb 20, 2022 · 

Good news, now we need more, and states need to



12:57

70%

m.facebook.com/

← INFANTRY OFFICER for Idaho

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INFANTRY OFFICER for Idaho

Jul 30, 2022

"Gender Affirming Care" Is a euphemism for castration, sterilization, and mutilation. A civilized people cannot tolerate such barbarism.

**NO CHILD IS BORN**



**IN THE WRONG BODY**

MESSANGER

INFANTRY OFFICER for Idaho



SEND MESSAGE



and 581 others



14:51



49%



Happening in Coeur d'Alene ID! Family friendly!  
 Drag dance party! The satanic temple of Idaho is  
 offering "unbaptisms" to anyone interested! Come  
 meet the self proclaimed fire breathing satanic nun  
 and her disgusting 🍑 nipples.



Rowan Astra  
 @rowanastria  
 🍑 will be at Coeur  
 D'Alene's "Pride in the Park" event  
 next Saturday, June 11th from  
 10am-3pm! We will have  
 merchandise and performing  
 unbaptisms for those interested!  
 Just know, Satan loves you for you!  
 Hail Satan!! 🍑🍑🍑  
 @rowanastria  
 #unbaptisms #pride #satan


[idahotribune.org](https://idahotribune.org)

On the North Idaho Pride Alliance website,  
 The Satanic Temple is listed as one of the

12:44

73%



INFANTRY OFFICER for Id...

Message Us



INFANTRY OFFICER for Idaho



Oct 27, 2022 · 🌐

My Democrat opponent, [REDACTED], thinks that if you don't want kid drag shows, porn in libraries, or radical sex and gender ideology in schools then you are the same as the Sharia law police in the Islamic State of Iran.

The radical Left has no intention of coexisting with those who don't support their agenda. Their hostility to Christianity and anyone who supports traditional values is increasingly clear, even in Idaho.

My opponent's comment starts at 1:05:20.  
Linked below:



LEAGUE of WOMEN VOTERS

CANDIDATE FORUM

YOUTUBE.COM

League of Women Voters of [REDACTED]  
legislative Candidate Forum

The League of Women Voters of [REDACTED] h...

14:56

49%



m.facebook.com/



INFANTRY OFFICER for Idaho

Message Us



INFANTRY OFFICER for Idaho

...

May 27, 2022 ·

WHEN YOU CAN'T  
WIN IN COMPETITIVE  
MALE SPORTS



🤔 89

👍 89

💬 8

➦ 9



INFANTRY OFFICER for Idaho

...

May 24, 2022 ·



12:47 ⓘ

📶 72%

← **INFANTRY OFFICER** for Idaho Message Us 🔍

👍 29



➦ 7



**INFANTRY OFFICER** for Idaho

...

Sep 22, 2022 · 🌐

The detransition community needs to be heard. Transgender ideology is dangerous. "Gender Affirming" treatments harm and disfigure children. They are irreversible and cause lifelong pain and remorse. These "treatments" must be stopped with the full force of law.



TWITTER.COM

 **Twitter**

👍 4

👍 4



**INFANTRY OFFICER** for Idaho

...

Sep 22, 2022 · 🌐

Proud to have the endorsement of the National Rifle Association. My opponent supports



After finding all this information I called and did the following:

13 July 2023:

- Called and filed complaint with 1SG [WITNESS 4] the 1SG for [X] Company. Told him I wanted to talk with MAJ [BCO] [SPECIALIZATION] Battalion Commander.
- MAJ [BCO] called to talk with me about this situation and said that 1SG [WITNESS 4] had informed him of what was going on. During this phone call MAJ [BCO] informed me that he had called and notified [INFANTRY OFFICER] that I was filling a complaint against him because MAJ [BCO] felt like [INFANTRY OFFICER] deserved to know that information. This immediately created a hostile work environment.
- [INFANTRY OFFICER] told 1SG [WITNESS 4] that he wanted to call and talk to me, but I declined to talk to [INFANTRY OFFICER] until we were able to meet with the command team and have them present for the conversation. After seeing all this information, I no longer felt safe around [INFANTRY OFFICER]. After I declined to talk over the phone with [INFANTRY OFFICER] he then told 1SG deWit that [INFANTRY OFFICER] and the 1SG were going to come to the [LOCATION] storefront and [INFANTRY OFFICER] was going to confront

me in person about the complaint that I was filing against him. I again declined to meet with him.

- We had a field training exercise in [REDACTED], ID on Saturday and Sunday, 15-16 July 2023. During this training [REDACTED] INFANTRY OFFICER myself and all the rest of the cadre would be sharing a tent together all weekend.
- I informed MAJ [REDACTED] BCO and 1SG [REDACTED] WITNESS 4 that I did not feel safe around [REDACTED] INFANTRY OFFICER and that I was very uncomfortable being around [REDACTED] INFANTRY OFFICER after everything that I just found out. Also the fact the MAJ [REDACTED] BCO had informed [REDACTED] INFANTRY OFFICER that I filed a complaint against him and that [REDACTED] INFANTRY OFFICER was going to be the highest ranking soldier at the field event and in direct charge of me all weekend.
- I asked MAJ [REDACTED] BCO and 1SG [REDACTED] WITNESS 4 to please make it so that either [REDACTED] INFANTRY OFFICER did not come to the field training exercise or that I be allowed to miss the exercise because of everything going on and until I had an opportunity to sit down with the command team on Wednesday 19 July 2023.

14 July 2023

- 1SG [REDACTED] WITNESS 4 asked [REDACTED] INFANTRY OFFICER not to come to the field training exercise that weekend so that we could meet with the command team on 19 July 2023 and get everything settled. [REDACTED] INFANTRY OFFICER said that he was the commander and that he would not let an E7 dictate what a MAJ would and wouldn't do in his own company.
- 1SG [REDACTED] WITNESS 4 called and asked MAJ [REDACTED] BCO to tell [REDACTED] INFANTRY OFFICER he was not allowed to come to drill until everything had been investigated and all the issues had been addressed. MAJ [REDACTED] BCO informed 1SG [REDACTED] WITNESS 4 that he would not be calling [REDACTED] INFANTRY OFFICER and that he was still going to come to drill. MAJ [REDACTED] BCO said that SFC [REDACTED] COMPLAINANT and [REDACTED] INFANTRY OFFICER will just have to figure it out.
- After hearing this around 1630 I became very upset and sick to my stomach to the point that I could not eat. I was so worried about what was going to happen during the field training exercise and what kind of repercussions and backlash I was about to face all weekend because MAJ [REDACTED] BCO had informed [REDACTED] INFANTRY OFFICER about the complaint and then refused to excuse either one of us from drill.
- I tried to call MAJ [REDACTED] BCO at 1937 and 1959 because he told me that I could call him day or night if I needed any help with this situation. He did not answer either phone call or call me back. I was calling to beg him to please reconsider and excuse either one of us from drill so that I did not have to be put into this potentially very dangerous situation.
- I called the SARC 24 hour hotline number at 1944 in-between trying to reach my BN Commander. I was informed that there was nothing they could do to help since I was not sexually assaulted and this was an EO case. I reached out to 3 listed phone numbers for the National Guard. However, all the EO and IG reps were gone for the weekend and would not be back until Monday at the earliest.
- Not having any guidance, help, instruction and having no one helping me and I felt completely alone, terrified for the weekend that I was being forced into going to with the person that I had just filed a complaint against.
- I then called the Chaplain at 2007 and thankfully Chaplain [REDACTED] CHAPLAIN answered. I explained the situation to him and he told me and I was going to be ok and that he was going to make sure that the situation would be addressed.

15 July 2023

- I arrived at drill at the [REDACTED] LOCATION armory. I went to 1SG [REDACTED] WITNESS 4 and told him that I wanted to talk to the Chaplain and he agreed with me so I called Chaplain [REDACTED] CHAPLAIN back.



- Chaplin **CHAPLAIN** talked to 1SG **WITNESS 4** about the situation and then called MAJ **BCO** to advise him to tell **INFANTRY OFFICER** not to go to drill that weekend.
- MAJ **BCO** texted **INFANTRY OFFICER** and had Chaplin **CHAPLAIN** call **INFANTRY OFFICER** to tell him to the leave the armory and leave drill.

I must emphasize that this has created an uncomfortable, unsafe, and a hostile work environment, making it increasingly challenging for me to perform my duties effectively. With the active ties to the extremist/hate group, it makes me feel threatened and unsafe. All the posts on his social media and how public he is about his hate towards individuals like me and my family. Not just for me but for my husband and my **CHILD**. With views and beliefs like this, what is stopping him from sending this hate group after me and my family? What would stop **INFANTRY OFFICER** from coming after my whole family just because he feels like it is immoral? According to **INFANTRY OFFICER** and in his own words, "When **INFANTRY OFFICER** says, 'I will not uphold any law that I feel to be immoral,' nothing would stop him. That is why I feel threatened and unsafe, and this has created a very hostile work environment.

As a member of the Idaho Army National Guard, I have the right to a work environment that is free from discrimination and harassment. I believe that I am entitled to the same rights, benefits, and opportunities as any other individual in the Idaho Army National Guard. I request a thorough investigation into the incidents mentioned above and appropriate actions taken to address this discrimination. I'm asking for the immediate removal of **INFANTRY OFFICER** as my commander in **X** Company, **SPECIALIZATION** because no one with views and beliefs like this should ever have any command authority over someone who they truly despise and believe to be immoral. I'm also asking that **INFANTRY OFFICER** be removed from the Idaho Army National Guard for unbecoming actions of an Officer in the United States Armed Forces. No one with such hate for any other members of society and such extreme views, values, beliefs, and active ties to an extremist/hate group should ever have any command authority over anyone, in my opinion.

I urge you to take this complaint seriously and address the matter promptly. I am open to discussing this issue further and providing any additional information necessary for the investigation.

Thank you for your attention to this serious issue.

Sincerely,

SFC **COMPLAINANT**