UNITED STATES FEDERAL COURT

DISTRICT OF OREGON

CHAL MCCOLLOUGH, ) Civil Case Number:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Plaintiff )

v. ) PLAINTIFF’S DECLARATION IN SUPPORT

PORTLAND STATE )

UNIVERSITY )

c/o Stephen Percy, )

ERICA GELLER of )

PORTLAND STATE )

UNIVERSITY , and )

SUSAN JEFFORDS of )

PORTLAND STATE )

UNIVERSITY )

Defendants, )

# Plaintiff’s Declaration in Support

My name is Chal McCollough and I am Plaintiff in this case. I declare that everything in my FIRST AMENDMENT COMPLAINT AND COMPENSATION DEMAND is 100% true and factual to the best of my knowledge.

PSU unlawfully abridged my free speech by kicking me out over me exercising my right to free speech in a protest against the unlawful PSU vaccine mandate. I am student who suffers from Legal Abuse Syndrome, a form of Complex PTSD caused by repeated exposure to stress from Court and life.

spent many years writing Court papers for a nightmarish third-party custody process that turned into an 8 year custody battle that ruined my life and left me disabled with CPSTD. My son’s mother left me and was neglecting our son and partying around him, then maternal grandmother committed Fraud upon the Court and got custody of my son by lying that she had custody of him for 6 months prior to filing for custody under ORS 109.119, which is a Post-Troxel law that unconstitutionally gives Psychological parents a Preponderance of the evidence standard if they have had custody of the child for 6 months unbroken. I made the mistake of representing myself not knowing a Preponderance meant.

I had the kid before trial, so she didn’t have my son for 6 months unbroken but, the Judge in the first Temporary custody hearing didn’t notice. I was incompetent at law and didn’t notice. I thought I had a right to free speech, but because it was a preponderance the Court used my free speech against me and awarded custody to maternal grandmother because I used a baby monitor, I cussed at the grandma in front of my son and told grandma I would stop talking to her. The Court said I wasn’t acing in my son’s best interest and gave custody to maternal grandmother.

Maternal grandmother then neglected my son, causing extreme emotional and psychological injury to us both, and eventually Oregon Department of Human Services got into her house, which looked like the inside of a dumpster. My son’s bed looked like a dumpster. Because the State chose to unlawfully experiment Post-Troxel with giving a Preponderance to psychological parents, it caused an almost decade long third-party custody nightmare that disabled with CPTSD and caused me to be rude to the people at [vaccines@pdx.edu](mailto:vaccines@pdx.edu) in the alleged PSU Code of Conduct violation central to this case.

It wasn’t until years after the custody nightmare began that I discovered Troxel v Granville, the US Supreme Court ruling that required the State to use clear and convincing evidence to deprive citizens of their Federally protected rights in the Bill of Rights. In legal terms Troxel is new. It is a landmark case that is yet to propagate through the entire legal system.

Your right to free speech doesn’t end on public property. In fact, when you are on public property, your right to free speech is stronger than when you’re on private property; someone can kick me off their property for my speech but not public property. When PSU deprives students of their right free speech, PSU is required to use clear and convincing evidence just like when the State is trying to take your kid away from you, or a grandparent. Parents have a right to the care custody of their children under the First Amendment. Hence abridging free speech is akin to third-party child custody and visitation. When the State intervenes in people’s lives, they tend to cause injury, as they have in this case, and often the intervention are not even needed.

A Preponderance of the evidence means that the parties have equal right, and Court only needs to show that more than likely the winning side’s facts are true. In contract, clear and convincing evidence means that the State is required to show that almost certainly the facts show there are detrimental circumstance that is a compelling State interest in intervening in the case to safeguard other’s rights. The detrimental circumstances can’t just be in the past or present, they must exist AFTER the Judge signs the order. You can’t just have injured your kid in the past for the State to get custody of your kid, they must show you are almost certainly going to injure the child in the future. The State is required to use the least amount of intervention possible to eliminate the detrimental circumstances.

In this case, the vaccine mandate was a one-off. It was an unlawful law created by an unelected body, the PSU Administration, and the PSU Student Health and Counseling (SHAC) was enforcing a unlawful law where the PSU Administration was overstepping their legal authority to force me to get an experimental mRNA vaccine with unknown side effects, in violation of the Nuremberg Code. The vaccine mandate waiver form was a one-time deal that would not happen again in the future and the SHAC could have chosen to not overreact to the vitriolic language and just take waiver. Instead, they chose to punish me because Democrats have pitted vaccinated vs unvaccinated citizens against each other for demagoguery purposes. Then I wouldn’t have to deal with the SHAQ in the future, and there would not be any detrimental circumstances moving forward in the future after the Judge signed the order.

Therefor PSU did not have clear and convincing evidence that there was a compelling State interest in abridging my right to free speech in the future to punish for speech that occurred in the past and almost certainly would not occur the future. The State did not need to impose disciplinary actions on my because it was not almost certain that I would be disrupting the staff in the future. I don’t have a pattern of disrupting the Staff.

Recent studies have show the mRNA has been high jacking human DNA to produce spike proteins in Human cells long after the injection using Human DNA mixed with mRNA. This could cause cancer. I am a Christian and the mRNA vaccines were created using aborted baby fetuses. I’m religiously opposed to abortion.

The PSU Appeal denial claims I didn’t attend the trial, which contracts the email log that shows that ERICA GELLER allowed me to use email testimony, so I did attend the trial. My grounds for appeal were that it would violate my right to free speech and the State had to use Clear and Convincing Evidence to deprive me of my fundamental Federally protect right to free speech on public property. This is the kind of legal arguments you put in the appeals, but the SUSAN JEFFORDS refused to acknowledge my legal argument. She did not once mention clear and convincing evidence or any method of my first amendment rights in the Appeal Denial; she intentionally skirted around my appeal argument because she knew she would have had to approve my appeal and she denied to punish me for my political beliefs and wrong think. Had I said the same thing to a student it would not have been a PSU Code of Conduct violation and would not have resulted in me being kicked out PSU.

It also took PSU and SUSAN JEFFORDS over 4 months do the appeal, during which time I’ve been out of school, unable to graduate, and unable to work due to my work gap and lack of degree. This has caused severe depression and anxiety from being kicked out of PSU with limited work opportunities, which has caused great psychological, emotional, and finachial injury and $10 MILLION in damages that I’m requesting Defendants compensate me for.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct and that this Petition was placed in the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ on \_\_\_\_\_\_\_\_\_\_\_\_, 2022.

Respectfully submitted \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2022.

Petitioner Chal McCollough  
Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2022