

1 ANTHONY MITCHELL  
2 Pro Se Plaintiff  
3 618 Painted Opus Place  
4 North Las Vegas, Nevada 89084  
5 Telephone: (702) 884-0472  
6 Email: RealAnthonyMitchell@gmail.com

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

8 ANTHONY MITCHELL,

9 Plaintiff,

10 v.

11 EMORY ANDREW TATE III, et al.,

12 Defendants.

Case No. 2:26-cv-00720-RFB-BNW

**DECLARATION OF ANTHONY MITCHELL  
IN SUPPORT OF PLAINTIFF’S MOTION  
FOR ORDER AUTHORIZING  
ALTERNATIVE SERVICE OF PROCESS  
PURSUANT TO FRCP 4(f)(3)**

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**DECLARATION OF ANTHONY MITCHELL IN SUPPORT OF  
PLAINTIFF’S MOTION FOR ORDER AUTHORIZING ALTERNATIVE  
SERVICE OF PROCESS PURSUANT TO FEDERAL RULE OF CIVIL  
PROCEDURE 4(f)(3)**

21 I, Anthony Mitchell, declare as follows:

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- 23 1. I am the Plaintiff in the above-captioned action. I am a resident of North Las Vegas,  
24 Nevada. I make this Declaration in support of my Motion for Order Authorizing  
25 Alternative Service of Process on Defendant Emory Andrew Tate III Pursuant to  
26 Federal Rule of Civil Procedure 4(f)(3). I have personal knowledge of the facts set  
27 forth herein and, if called as a witness, could and would testify competently to the  
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1 same.

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3 2. I filed this action on March 23, 2026. The Court entered the complaint on March 25, 2026  
4 (ECF No. 5). The ninety-day deadline to serve all defendants under Federal Rule of  
5 Civil Procedure 4(m) is June 21, 2026. Co-defendant Thrifty Consulting LLC was  
6 served on April 15, 2026, through its registered agent, Cogency Global Inc., in Dover,  
7 Delaware. Defendant Emory Andrew Tate III (“Tate”) has not been served.

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9 3. In or about February 2026, I retained Verite Investigations LLC, a licensed private  
10 investigative firm, to conduct a comprehensive search for any United States  
11 residential address for Defendant Tate. Rachelle Dabrowski, a Michigan-licensed  
12 private investigator (License No. 3701300326), conducted the investigation. On  
13 March 7, 2026, Ms. Dabrowski executed a notarized Affidavit of Due Diligence and  
14 Non-Locate Investigation (the “Verite Affidavit”) before Notary Trishia Otto,  
15 Commission No. HH345623, Brevard County, Florida. A true and correct copy of the  
16 Verite Affidavit is attached to the Motion as **Exhibit A**.

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18 4. Ms. Dabrowski’s investigation searched a minimum of two commercially available  
19 investigative databases—the same professional-grade resources used by law  
20 enforcement and litigation investigators nationwide, aggregating address history,  
21 property records, DMV records, voter registration, utility records, bankruptcy indices,  
22 and court records. She conducted fifteen separate queries and cross-referenced  
23 thirty-six individual records. She also reviewed Defendant Tate’s verified X (Twitter)  
24 account (@Cobratate), business platform therealworld.org, fundraiser.com, and  
25 WHOIS domain registration records. Based on records-based and open-source  
26 investigation, Ms. Dabrowski found no reliable current United States residential  
27 address identifiable for service for Defendant Emory Andrew Tate III. The  
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1 investigation was limited to U.S.-based address identification.

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3 5. On August 22, 2025, Defendant Tate, through counsel, filed a civil cover sheet in *Tate v.*  
4 *Meta Platforms, Inc.*, filed August 22, 2025 and later transferred to the Northern  
5 District of California in January 2026, docketed as Case No. 3:26-cv-00901-JSC (the  
6 “Meta Litigation”). On that civil cover sheet, in the field designated for “County of  
7 Residence,” Tate’s counsel listed “U.A.E./Romania.” A true and correct copy of that  
8 civil cover sheet is attached to the Motion as **Exhibit B**.

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10 6. Attached to the Motion as **Exhibit C** are two PACER documents from the  
11 MetaLitigation: (a) the complete docket history reflecting 47 entries from August 22,  
12 2025 through March 20, 2026, and (b) the official PACER Attorney List confirming  
13 Defendant Tate’s counsel of record. Per that official roster, queried on April 20, 2026,  
14 Defendant Tate’s attorneys of record are: **Raymond E. Brenneman, Esq.** (Lead  
15 Attorney), Brenneman APC, 1901 Avenue of the Stars, Suite 200, Los Angeles,  
16 California 90067 (raymond@brennemanlegal.com; 310-870-8088), assigned August  
17 28, 2025; and **Thomas A. Maniotis, Esq.** (Pro Hac Vice), Equity Legal PLLC, 5201  
18 Blue Lagoon Drive, 8th Floor, Miami, Florida 33126 (tamaniotis@equitylegal.net;  
19 305-629-3219), assigned September 1, 2025. Both are listed as “Attorney to Be  
20 Noticed” as of April 20, 2026. Those counsel filed an Opposition to Meta’s Motion to  
21 Dismiss on March 13, 2026. On March 28, 2026, I transmitted a formal Rule 4(d)  
22 waiver of service request to both counsel by email, as further described in paragraph 7  
23 below. As of the date of this Declaration, neither attorney has appeared in this case,  
24 and lead counsel declined to accept service on behalf of any named defendant, as  
25 further described in paragraph 7 below.  
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1 7. On March 28, 2026, I transmitted by email to Thomas A. Maniotis, Esq.  
2 (tamaniotis@equitylegal.net) and Raymond E. Brenneman, Esq.  
3 (raymond@brennemanlegal.com) a formal Request to Waive Service of Summons  
4 pursuant to Federal Rule of Civil Procedure 4(d), together with AO Form 398 and AO  
5 Form 399 for each named defendant, and a copy of the filed complaint (ECF No. 5). I  
6 used Mailsuite, a third-party email delivery and open-tracking service, to document  
7 delivery and receipt. The Mailsuite Email Delivery Certificate confirms: (a) the email  
8 was delivered on March 28, 2026 at 9:35 PM; (b) Mr. Maniotis opened the email on  
9 March 28, 2026 at 9:36 PM, within one minute of delivery; (c) Mr. Brenneman  
10 opened the email on March 28, 2026 at 9:37 PM, within two minutes of delivery; (d)  
11 Mr. Brenneman reopened the email on March 30, 2026 at 7:22 AM; and (e) both Mr.  
12 Maniotis and Mr. Brenneman reopened the email on April 15, 2026 at 11:23 PM.  
13 April 15, 2026 is the same date on which co-defendant Thrifty Consulting LLC was  
14 served with process in this action through its registered agent, Cogency Global Inc., in  
15 Dover, Delaware (see paragraph 2 above). Defendant Emory Andrew Tate III is the  
16 Chief Executive Officer of Thrifty Consulting LLC. The fact that both of Defendant  
17 Tate's personal attorneys simultaneously reviewed the complaint on the same evening  
18 that Tate's own company was served supports a reasonable inference that Defendant  
19 was informed of that service and communicated with his counsel regarding this  
20 litigation. A true and correct copy of the Mailsuite Email Delivery Certificate is  
21 attached to the Motion as **Exhibit E**. On March 30, 2026, at 4:26 AM, Mr.  
22 Brenneman responded by email. The complete text of his response, exclusive of  
23 signature block, is as follows: "Mr. Mitchell, My firm does not represent the entity  
24 defendants and is unable to accept service on behalf of any of the named defendants.  
25 Best Regards, Raymond Brenneman, Esq., Brenneman APC." Mr. Maniotis did not  
26 respond separately. Mr. Brenneman's response was also addressed to Mr. Maniotis  
27 (tamaniotis@equitylegal.net). A true and correct screenshot of Mr. Brenneman's full  
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1 response, including email header and timestamp, is attached to the Motion as **Exhibit**  
2 **F**. As of April 20, 2026, no executed waiver of service has been returned by either  
3 attorney.

4  
5 8. Based on open-source public research, I have identified a publicly reported address  
6 identified through open-source research and cross-referenced with publicly available  
7 materials for Defendant Tate in Romania: Strada Drumul Bisericii 50A, 077190  
8 Voluntari, Romania (the “Romania Address”). I identified this address by conducting  
9 a standard internet search for Defendant Tate’s Romanian address, which returned the  
10 Strada Drumul Bisericii 50A address through multiple public sources. I independently  
11 verified the address using Google Street View, which displays the structure at that  
12 location as a large converted warehouse. I then cross-referenced that Street View  
13 imagery with videos publicly uploaded to the internet by or featuring Defendant Tate,  
14 which depict the same converted warehouse as a filming and residential location. The  
15 Verite Affidavit (Exhibit A) confirmed, based on records-based and open-source  
16 investigation, no reliable current United States residential address identifiable for  
17 service for Defendant Tate; it did not purport to identify a foreign address. I plan to  
18 send a courtesy copy of the summons and complaint via FedEx international air mail  
19 with tracking to the Romania Address as a supplementary notice measure, concurrent  
20 with the Court-authorized primary service methods.

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23 9. Defendant Tate maintains a verified account on X (Twitter) under the handle @Cobratate.

24 The @Cobratate account on X (Twitter) is publicly held out as Defendant’s official  
25 account, has been used consistently in Defendant’s public-facing communications,  
26 and bears a verified checkmark on the platform. Attached to the Motion as **Exhibit D**  
27 are two screenshots documenting that account’s active and personal use. First, a  
28 screenshot of a direct message conversation with the @Cobratate account, initiated by

1 the @Cobratate account on January 30, 2025, confirming the direct message function  
2 of that account is actively monitored. Second, a screenshot of a post published by the  
3 @Cobratate account on April 16, 2026  
4 (x.com/Cobratate/status/2044869638291390902) shows a first-person, present-tense  
5 statement — “Whether I’m in Tashkent Dubai Miami or Almaty” — that is consistent  
6 with personal operation of the account. That post received 275,400 views and was  
7 published three days before the filing of this Declaration.

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9 10. Defendant Tate controls two commercial websites through which service documents  
10 may be transmitted. therealworld.org is an online educational subscription platform  
11 whose own disclosures state it is “Owned and Managed by New Era Learning LLC”  
12 and distributed by Thrifty Consulting LLC and Legendary Courses, Inc. All three are  
13 named defendants in this action and Defendant Tate is the Chief Executive Officer of  
14 Thrifty Consulting LLC. Service documents may be transmitted to this platform via  
15 support@jointherealworld.com. fundraiser.com is a funding platform whose  
16 navigation contains a direct hyperlink to cobratate.com and whose contact link routes  
17 to cobratate.com/contact — Defendant Tate’s personal website. The site’s body  
18 content states “Apply for investment from Andrew Tate & The War Room.” Service  
19 documents transmitted through the fundraiser.com contact channel will be routed  
20 directly to Defendant Tate or his agents via his personal website.

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23 11. I have made diligent, good-faith efforts to effect service on Defendant Tate. Those  
24 efforts include: (a) retaining Verite Investigations LLC to conduct a comprehensive  
25 professional investigation for any U.S. residential address; (b) researching publicly  
26 available sources for a domestic address; (c) reviewing court filings in pending federal  
27 proceedings involving Defendant Tate; (d) identifying and documenting Tate’s active  
28 social media presence and commercial web presence; and (e) transmitting formal Rule

1 4(d) waiver-of-service requests, with the filed complaint attached, to Defendant's  
2 known U.S. counsel on March 28, 2026, which were confirmed received and  
3 personally opened by both attorneys within two minutes of delivery as documented by  
4 the Mailsuite Email Delivery Certificate (Exhibit E); lead counsel responded on  
5 March 30, 2026 declining to accept service on behalf of any named defendant (Exhibit  
6 F), and no executed waiver has been returned. All efforts have confirmed, based on  
7 records-based and open-source investigation, that Defendant Tate maintains no  
8 reliable current United States residential address identifiable for service.

9  
10 12. None of the alternative service methods sought in my Motion are prohibited by any  
11 applicable international agreement. To the extent reflected in publicly available  
12 Hague declarations, Romania has not objected to service via counsel or electronic  
13 means; its declarations are limited to objection to postal channels under Article 10(a).  
14 Service upon Defendant Tate's U.S.-based counsel is a domestic transaction not  
15 governed by the Hague Convention. Service via social media accounts and  
16 commercial contact forms does not constitute service by "postal channels" as defined  
17 by Hague Convention Article 10(a), and Romania's objection to postal channels does  
18 not extend to electronic or internet-based service directed at a defendant's own  
19 accounts and platforms. Any FedEx transmission is proposed as supplementary  
20 courtesy notice only, not as primary service.

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23 13. To my knowledge, Defendant Tate is currently a named plaintiff in active federal  
24 litigation in the Northern District of California, Case No. 3:26-cv-00901-JSC,  
25 represented by the same counsel identified in paragraph 6 of this Declaration.  
26 Although Defendant Tate appears as a plaintiff in that proceeding, he is represented  
27 therein by the same U.S. counsel identified above, demonstrating active  
28 attorney-client communication in pending federal litigation. The same attorneys who

1 have received the complaint in this action currently represent Defendant Tate in  
2 separate active federal litigation and are therefore in a position to promptly transmit  
3 service documents to him.  
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5 14. For all the foregoing reasons, I respectfully request that the Court grant my Motion and  
6 enter the proposed Order authorizing alternative service.  
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8 I declare under penalty of perjury under the laws of the United States of America, pursuant to  
9 28 U.S.C. § 1746, that the foregoing is true and correct.  
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11 Executed on April 20, 2026, at North Las Vegas, Nevada.  
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14  
15 */s/ Anthony Mitchell*  
16 Anthony Mitchell  
17 Pro Se Plaintiff  
18 618 Painted Opus Place  
19 North Las Vegas, Nevada 89084  
20 Tel: (702) 884-0472  
21 Email: RealAnthonyMitchell@gmail.com  
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