

**EXHIBIT "15"**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION

HISPANIC INTEREST COALITION )  
OF ALABAMA; et al., )

Plaintiffs, )

v. )

CASE NO. 5:11-CV-2484-SLB

ROBERT BENTLEY, in his official )  
capacity as Governor of the State of )  
Alabama; et al., )

Defendants. )

RT. REV. HENRY N. PARSLEY, JR., in )  
his official capacity as Bishop of the )  
Episcopal Church in the Diocese of )  
Alabama, et al., )

Plaintiffs, )

v. )

Case Number: 5:11-CV-2736-CLS

ROBERT BENTLEY, in his official )  
capacity as Governor of the State of )  
Alabama; et al., )

Defendants. )

UNITED STATES OF AMERICA, )

Plaintiff, )

v. )

Case Number: 2:11-CV-2746-LSC

STATE OF ALABAMA; )  
GOVERNOR ROBERT J. BENTLEY, )

Defendants. )

## AFFIDAVIT OF RIGHT REVEREND CLETUS D. MEAGHER, ABBOT

My name is Cletus D. Meagher. I am over the age of 19 years and am competent to give this affidavit. I have personal knowledge of the matters stated herein. This affidavit is submitted in support of a motion for preliminary injunction filed by the Plaintiffs in the Case No. 5:11-CV-2736-CLS, styled Rt. Rev. Henry N. Parsley, Jr. etc., et al. v. Robert Bentley, etc., et al.

I am the elected abbot of the monastic community of Saint Bernard Abbey known as The Benedictine Society of Alabama, Inc. The Benedictine Society of Alabama (D.B.A. St. Bernard Abbey) is a Roman Catholic community of Benedictine Monks whose purpose is to give Christian witness by living a monastic manner of life and engaging in apostolic works, viz. education, pastoral work, and various ministries of hospitality, e.g. operating a retreat center and conference center, receiving guests and pilgrims at the shrine of the Ave Maria Grotto.

Our monastic tradition's roots go back to the 6<sup>th</sup> century and the Rule of St. Benedict. Our primary purpose according to the Rule of St. Benedict (chapter 58) is "to seek God". The monastic community is a free association of individuals who embrace the monastic manner of life as outlined by St. Benedict and constructed around the two pillars of Prayer and Work / Ora et Labora. Our prayer life is carried out in a daily routine of biblical prayer. Our work is various and seeks to reflect Christian values, viz. staffing of Catholic parishes in the Archdiocese of Mobile and the Diocese of Birmingham, education (we operate a middle and prep school / grades 7-12), the operation of a retreat and conference center, and we receive pilgrims at the shrine of the Ave Maria Grotto, which hosts about 35,000 visitors a year.

Our monastery is made up of thirty (30) monks. The Abbey employs ca. twenty (20) employees. St. Bernard Preparatory School in Cullman employs 6 teachers who are members of the monastery as well as twenty to twenty-five (20-25) lay teachers and staff. In addition, the school is fortunate to have volunteers numbering between fifty to seventy-five (50-75). St. Bernard Retreat and Conference, also in Cullman on the Abbey grounds, has a director who is a monk and four lay staff members. Ave Maria Grotto employs three (3) monks, six (6) lay employees, and one volunteer. At St. Joseph's Catholic Church in Florence, one of our monks serves as pastor and employs a staff of three (3) and approximately fifty (50) volunteers. At St. Bartholomew Catholic Church in Elberta, one of our monks serves as pastor and employs a staff of three (3) and approximately fifty (50) volunteers. St. Bartholomew Catholic School, also in Elberta, with grades K-8, has faculty and staff numbering twenty (20) and approximately seventy-five (75) volunteers. At Sacred Heart Church in Cullman, one of our monks serves as pastor and another monk serves as associate pastor, and employs eight to ten (8-10) lay staff, and has approximately eighty to one hundred (80 – 100) volunteers. At Sacred Heart School, also in Cullman, which has grades 3K-6, there are fifteen (15) faculty and staff members and approximately seventy-five (75) volunteers.

Considering all the ministries above, we serve between 35,000 to 40,000 people. The ethnicity of those served is varied, most being Caucasian, but also Hispanic, African-American, Korean, Chinese, African, Indian, and Ethiopian-Coptic. The Caucasian population we serve is mostly in the Cullman area, although there is a significant number of foreign visitors to the Ave Maria Grotto; the minority groups are served in the parish ministries and/or in St. Bernard Preparatory School.

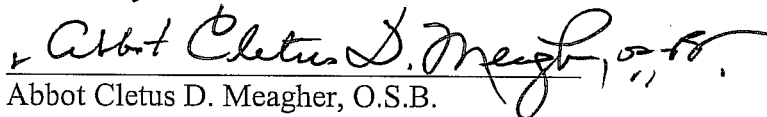
Despite HB56 we cannot refuse service of Christian charity to someone in need; we cannot deny use of facilities or entrance in to the schools because of legal / illegal status; we cannot refuse to minister to the religious needs of an individual; refuse entrance into the Ave Maria Grotto religious shrine; refuse admittance and participation in the sacramental life of the Catholic Church if they are Catholic. If we are placed in conflict with the law we will suffer the consequences. We must and do choose God.

We know of people to whom we provide services who have been stopped by law enforcement officials, ostensibly for a traffic violation, and were harassed.

The Gospel of Matthew (chapter 25) speaks of the judgment we will receive according to how we treated others in need. A significant number of scriptural citations could be used to reinforce the Judeo-Christian attitude we should have for the poor, the orphan, the widow, the alien (stranger).

HB 56 has and will impair our ability as monks and ministers to freely exercise our religious practice. This is particularly true in the parish and school settings where we serve, where there are many people of Hispanic descent, who seem to be the target of this law.

Further affiant sayeth not.

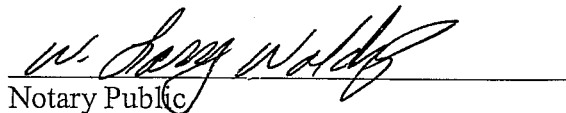
  
Abbot Cletus D. Meagher, O.S.B.

STATE OF ALABAMA )

COUNTY OF CULLMAN )

Before me, the undersigned notary public in and for said county in said state, personally appeared Abbot Cletus D. Meagher, who is known to me and who, being by me first duly sworn, did depose and state that she has read the foregoing Affidavit and the statements contained therein are true and correct.

Given under my hand and official seal on this the 16 day of August, 2011.

  
Notary Public

[SEAL]

My Commission Expires: MY COMMISSION EXPIRES 02-23-2012