

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL NEWDOW, *et al.*,

Plaintiffs,

v.

HON. JOHN ROBERTS, JR., *et al.*,

Defendants.

Civil case No. 1:08-cv-02248-RBW

PLAINTIFFS' FIRST AMENDED COMPLAINT
APPENDIX F: DECLARATIONS OF REMAINING ORIGINAL
INDIVIDUAL PLAINTIFFS

MICHAEL NEWDOW

In pro per and pro hac vice

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I, Michael Newdow, declare as follows:

- (1) I am a citizen of the United States, a resident of the State of California, Reverend of the First Atheist Church of True Science (“FACTS”), a member of the Freedom From Religion Foundation (“FFRF”) and the American Humanist Association (“AHA”), and an Atheist. I have witnessed prior inaugurations, including both of those involving President George W. Bush.
- (2) On January 20, 2009, I traveled to Washington, DC, to view the inauguration of President Obama. I had obtained tickets to be admitted to the event. I accompanied a minor child, whose parents had entrusted her care to me. Unable to get into the viewing section for which we had tickets, we entered the Rayburn House Office Building, and found a room where numerous individuals were watching the ceremony on a television. We watched along with them.
- (3) I was infuriated by the repeated endorsements of belief in God, and felt as a “political outsider” among the many other viewers who were clearly Christian Monotheists, participating in Defendant Rev. Warren’s recitation of the Lord’s Prayer, bowing their heads during the invocation and benediction, and so on. In fact, the very first words I heard after the ceremony ended was a “God bless you” from one of the viewers.
- (4) Because I have a keen interest in our nation's government generally, and in the inaugural ceremonies in particular, I plan to view every future inauguration for the rest of my life. Being age 55 and in good health, I expect that I will view at least six more inaugurations. It is my fervent hope that I won’t have to endure any further violations of my fundamental rights under the religion clauses of the Constitution at any of those.
- (5) Incidentally, while at the inaugural locale, I basically saw only two types of vehicles. The first type was comprised of those belonging to police and other law enforcement authorities. The other type consisted of upscale SUVs ... all with license plates that read “PIC 2009.” I asked one of the occupants of one of these vehicles if the PIC was a private or a governmental entity. She said she believed it was governmental. A photograph I took of these vehicles (along with a photograph of one of the license plates) is attached.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 26, 2009,



Michael Newdow



Ellery Schempp

**24 Boston Ave.
Medford, MA 02155**

**tel: 781-483-3100
email: elleryfs@comcast.net**

I, Ellery Schempp, declare as follows:

I am a citizen of the United States, a resident of the Commonwealth of Massachusetts, a member of the Unitarian-Universalist Church, First Parish, in Bedford, Massachusetts, a member of the Freedom From Religion Foundation ("FFRF"), the American Humanist Association ("AHA"), the National Center for Science Education ("NCSE"), Americans United for Separation of Church and State ("AUC&S"), the Secular Coalition for America ("SCA"), the Center for Naturalism, and the Skeptic Society, and I am a Secularist, Humanist, and Atheist.

(1) I have watched every inauguration on television at home since 1960.

On January 20, 2009, I watched the inauguration of Barack Obama as President on TV at my home with my fiancé Arlene.

(1) When I heard the Chief Justice add "so help me God" to the oath of office, I felt offended. This phrase about "God" is not in our Constitution, and I have high regard for the original intent and wording of our Founders. Further, I do not believe that incantations to a 'deity' help humans solve human problems. To me, it sounded like a superstitious ritual, which offends true spiritual concerns.

(2) When the clergy gave their invocation and benediction, I thought this an intrusion of church-oriented "pastors" who have their own agendas. Magical thinking has never been worthwhile in human affairs, and the business of the people has nothing to do with the many and various personal religious faith beliefs of

citizens. Government should be secular, that is, pragmatic, and not about promoting theism or other religious dogmas.

(3) I intend to watch all future inaugurations during my lifetime, which should be approximately four inaugurations over the next 15-20 years.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 21, 2009.


Ellery Schempp

I, Mel Lipman, declare that I am a citizen of the United States, a resident of the State of Florida, Immediate Past President and current board member of the American Humanist Association, a member of the Freedom From Religion Foundation and a Humanistic Jew who does not believe in a god.


My wife and I viewed the inauguration ceremonies from home on television. The repetitive references to belief in a monotheistic god and the recitation of the “Lord’s Prayer” during the ceremony, made me feel as an outsider watching a ceremony in a theocracy of which I was not part.

As a Constitutional Law instructor at several colleges, I was dismayed to hear the presidential oath being stated by the Chief Justice and repeated by the President-elect. The U.S. Constitution clearly states each word of that oath. But, keeping with recent unconstitutional tradition, additional words were added to the oath at this ceremony— words that do not belong in a government ceremony in the secular government envisioned by the drafters of our constitution.

I want to believe that I am a part of my country rather than merely an outside observer. I am a healthy 72 year old and I hope to view at least two more inaugural ceremonies. Before I die, and for the sake of my children and grandchildren, I want to see inaugural ceremonies that do not violate my fundamental constitutional right to be free from endorsement of religion by my government.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2009.



Mel Lipman

"I, Dan Barker, declare as follows: I watched the Inauguration of Barack Obama on January 20, 2009, via live streaming through CNN on my computer in my work office. I was pleased to be participating in the most significant ceremony of my country and proud to be an American, observing the installation of our democratically elected president of our secular nation. I was hurt that the Inaugural Committee decided to include formal prayers at the beginning and ending of the ceremony, as I am not religious and not only do not think prayers are ineffectual but think they cause to divide Americans into two groups: those who pretend there is a supernatural world under which our country exists, and those of us who know there is not. I felt left out and excluded. I felt like a second-class American when I saw the Inauguration directly interfere with and contradict my most precious, private opinions on religious matters. I would love to watch future inaugurations, but now feel less excited about it, anticipating that my views will once again be insulted in a ceremony that is supposed to include all Americans. I declare under penalty of perjury that the foregoing is true and correct. Executed on February 11, 2009."

A handwritten signature in black ink that reads "Dan Barker". The signature is written in a cursive, flowing style with a large initial "D" and "B".

Dan Barker
2400 Fox Ave
Madison, Wisconsin 53711

February 11, 2009



I, Annie Laurie Gaylor, declare as follows:

I am a citizen of the United States, a resident of the State of Wisconsin, a founder and co-president of the Freedom From Religion Foundation (FFRF) and an atheist. The Freedom From Religion Foundation was incorporated as a national group in 1978, and has two purposes: to educate about nontheism, and to promote the Constitutional separation of church and state. The Foundation is the largest national association of freethinkers with more than 13,000 members and members in every state.

On January 20, 2009, I viewed the prayers and swearing-in segments of the Inauguration of President Obama, first via the Internet live at work, and later again watching the entire Inauguration via a C-Span recording on our television at home in Madison, Wis.

I was so disappointed and frustrated that the Inauguration appeared to turn into a religious, instead of civil, ceremony. I bridled at Rev. Rick Warren ordering me and the public to pray, and was shocked that he prayed in the name of Jesus (repeating the name in several languages). Rev. Joseph Lowery prayed at me and the public at great length. I found the public spectacle of someone whom I have respected as a former civil rights activist, praying out loud to an imaginary deity, to be highly embarrassing. Such remarks were suitable only to a private religious ceremony attended voluntarily by believers, not at the official government Inauguration which takes place for the benefit of all citizens.

As someone who has an interest in the news and politics of the day, I make it a point to view the presidential inaugurations, and believe I have watched all of them since I came of age. I am 53, and hope and expect to view at least six more inaugurations. I would like to see this constitutional violation—the official injection of religion and Christianity into the presidential swearing-in where the president takes an oath to uphold our secular Constitution—to be expeditiously remedied so that our government can return to the secular policies inaugurated by the Founding Fathers, and so that I will not feel excluded.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on February 4, 2009

Annie Laurie Gaylor

I, Robert Sherman, declare as follows:

- (1) I am a citizen of the United States, a resident of the State of Illinois, the founder of Rob Sherman Advocacy, and an Atheist.
- (2) I had planned on travelling to Washington, D.C., to view the inauguration on January 20, 2009, on a big screen television. However, I chose not to go and not to watch the inauguration because of all the offensively inappropriate God stuff that I knew would be crammed into what was supposed to be a secular government ceremony.
- (3) I have avoided watching previous inaugurations for as far back as I can remember for the same reason.
- (4) I intend to watch all future inaugurations during my lifetime, which should be the next twenty to twenty-eight years, but only if the ceremonies are secular, as they are supposed to be.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 21, 2009.


Robert Sherman

I, August Berkshire, declare as follows:

I am a citizen of the United States, a resident of the State of Minnesota, a life member and president of Minnesota Atheists (MNA), a member of the Humanists of Minnesota (HoM), a member of the board of directors of Camp Quest of Minnesota (CQMN; a secular humanist summer camp), a life member and vice president of Atheist Alliance International (AAI), a life member and member of the board of directors of the Freedom From Religion Foundation (FFRF), a life member of the American Humanist Association (AHA), and a member of American Atheists.

I recall watching the 2001 presidential inauguration on television. I watched both because the election had been controversial and because I was very concerned about the degree to which the incoming president (George W. Bush) would or would not uphold the First Amendment guarantee of separation of state and church. Sadly, in both the administration of the presidential oath and its repetition, the words “so help me God” were added. This was the beginning of a period of eight years in which I felt my rights as an atheist were being ignored by my government.

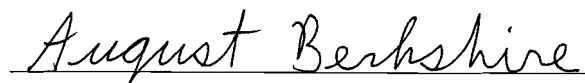
On January 20, 2009, I watched the inauguration of President Barack Obama on television. My sense of patriotic pride was ruined when Defendant Pastor Rick Warren interrupted the secular ceremony with sectarian Christian prayer. I don’t know who he was talking to, I only know it wasn’t me. I felt excluded.

Then, when Defendant Chief Justice John Roberts administered the presidential oath of office, I again felt the secular ceremony was ruined by the addition of government-sponsored religion. I am fully aware that the presidential oath appears in the U.S. Constitution and does *not* include the words “so help me God.” I think Justice Roberts should have stuck to the words in the U.S. Constitution. The addition of “so help me God” amounted to a religious test for public office, in violation of the U.S. Constitution. Because of this, it gave me the impression that an atheist could never be president, that we are second class citizens.

I am very interested in government and separation of state and church, and for these reasons I plan to view every future presidential inauguration for the rest of my life. Being 49 years old and in good health, I expect that I will view at least seven more inaugurations. I look forward to future inaugurations being free from government-sponsored religion and adhering to the U.S. Constitution. This is my right as a citizen of the United States.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 6, 2009,



August Berkshire

Atheists for Human Rights

"Let us become post-religious, post-national, universal humans."—Lavanam, Atheist Centre, India

February 5, 2009

Michael Newdow
PO Box 233345
Sacramento, CA 95823

I, Marie Alena Castle, citizen of the United States, resident of the State of Minnesota, member of American Atheists, Freedom From Religion Foundation, Atheist Alliance Int'l, various local groups, valiant atheist, and communications director for the national Atheists For Human Rights (AFHR), for myself as a plaintiff, and on behalf of AFHR, which is also a plaintiff, declare as follows:

As advocates for religion-free government that does not give preferential treatment to any group, many of our members had reported strong interest in the extent to which the Inauguration would be secular. Several local members (5, including myself) were at our headquarters to watch the event on our big screen TV on January 20, 2009. All expressed disappointment and outrage at the religiosity we were exposed to. One said it felt like being in church. Of the many comments, no one could see any reason for the prayers other than an arrogant assumption that the U.S. is a Christian nation and unbelievers are outsiders. All of us agreed that the event did make us feel like outsiders. We all agreed that we would continue to watch these political events in hopes of seeing them become inclusive and that we would continue to object if they are not. It is wrong as well as mean-spirited for a presidential inauguration to so disdain any of its citizens.

My personal experience is that I have avoided watching inaugurals because of the religiosity. I have always found that offensive and dismissive of me as a worthy citizen. Even if the religiosity consists only of "so help me God," I find that offensive because it is not part of the oath as stated in the Constitution. The implication is that the Constitution is not good enough and needs an overlay of religion to validate it.

I watched the Obama inaugural in hopes that it would be inclusive, but it was not. It was, if anything, worse than previous inaugurals. I do not intend to expose myself to these unconstitutional insults in the future.

I declare under penalty of perjury that the foregoing is true and correct.

Marie Alena Castle
Communications Director

Marie Alena Castle

Continuing our history of innovative atheist activism in Minnesota and the nation since the 1980s.

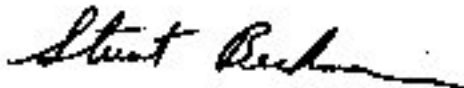
5146 Newton Ave. No., Minneapolis MN 55430; 612-529-1200; 1-866-ATHEIST (toll free)
mac@mtn.org; www.AtheistsForHumanRights.org

I, Stuart Bechman, declare as follows:

- Because of the denial of the original injunction, I anticipated the inaugural ceremony to be offensive, exclusionary to me, and in violation of the First Amendment of our Constitution; and so I did not participate in or view any part of the inaugural ceremony.
- I reviewed the subsequent media reports on the ceremony and not only confirmed my suspicions of the offensiveness and exclusionary character of the religious invocation, benediction, and recital of the Oath of Office by the inclusion of sectarian proclamations outside the oath prescribed by the US Constitution.
- I was further offended at the indication from the invocation and benediction provided that our government and this ceremony honored not just religious, but only Christian Americans.
- The ceremony program conveyed to me that the Constitution is to be disregarded by this new administration and that my government has no interest or intention in recognizing or representing my rights as a US citizen because I do not share the Christian belief and worldview.
- As these inaugurations clearly do not mean to include me or those who share my worldview, I do not intend to attend or watch any future presidential inaugurations, and I intend to shield my children and grandchildren from them in order to protect them from the messages that our government ignores our laws and that we are second-class citizens in this country.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 3, 2009.

A handwritten signature in black ink that reads "Stuart Bechman". The signature is written in a cursive style with a long, sweeping underline.

-Stuart Bechman

I, Herb Silverman, declare as follows:

I am a citizen of the United States, a resident of the State of South Carolina, President of the Secular Coalition for America (“SCA”), board member of the American Humanist Association (“AHA”), faculty advisor to the College of Charleston Atheist-Humanist Alliance student group, and an Atheist. I watched the Inauguration of President Obama on television.

Americans may disagree about whether God was actually at President Obama’s inauguration, but His name was omnipresent. Tuesday’s events began with a morning worship service, and then Reverends Rick Warren and Joseph Lowery bookended the inauguration, itself, with an invocation and benediction. And all this religiosity made me feel like a second-class citizen.

Like most Americans, I felt a wonderful and profound chill watching Barack Obama become the first African-American president. I only wish his interest in being inclusive to all Americans would have included the recognition that we were founded as a secular nation with a godless Constitution to protect the freedom of conscience and belief – or nonbelief – for all people.

I intend to see all future inaugurations. Though I do not believe in any gods, I hope this will be the last inauguration I see in which the separation of religion and government is so abused. That would be change I can believe in.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2009

Herb Silverman

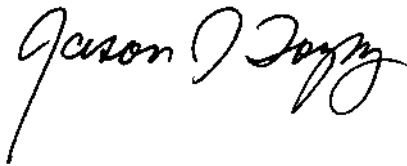


I, Jason Torpy, declare as follows:

- (1) I am a citizen of the United States, a resident of the State of New York, President of the Military Association of Atheists & Freethinkers ("MAAF") and board member of AHA, graduate of West Point, Iraq War veteran and a nontheist.
- (2) I viewed the most recent four prior presidential inaugurations on television, including both Clinton and Bush inaugurations.
- (3) On January 20, 2009, I viewed the inauguration of Barrack Obama on television, once again noting the prominent presence of monotheistic religion, including the undue assertion of "So Help Me God" at the end of the oath, in deviation from the Constitutional text.
- (4) During each inauguration, I noted with disappointment the use of religious messages and the Christian Bible during each. In particular, the Christian prayer and pandering, undocumented in the Constitutional ceremony and authorized entirely by personal religious beliefs rather than public or Constitutional mandate, show that Christians hold an undue and disturbing influence in our government and that even though a black man can be elected, non-Christians apparently are still de-facto second-class citizens. With a keen interest in our nation's government, I plan to view most future inaugurations for the rest of my life, especially if reforms are made to avoid the exclusionary and divisive practice of including religious messages in inauguration ceremonies.
- (5) At age 32 and in very good health, I expect that will include at approximately ten more inaugurations after the one that occurred on January 20, 2009.


I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 19, 2009,

A handwritten signature in black ink that reads "Jason Torpy". The signature is written in a cursive, flowing style with a long, sweeping underline that extends to the left.

Jason Torpy

I, Harry Greenberger, am a citizen of the U.S. and a resident of Louisiana. I am President of New Orleans Secular Humanist Association and a member of several national secular organization. I spent the entire day of inauguration of the President in front of my home television set, recognizing its national and international significance. The unconstitutional intrusion by the invocation and benediction sent a disturbing message of bonds between the government and religion, which should not exist and was disturbing to me. Of course, I found repugnant the addition of "so help me God" to the constitutionally prescribed oath of office. I was, however, pleased to see how few of the attendees bowed their heads during the prayers. It is my intention to view future inauguration ceremonies. I declare under penalty of perjury that the foregoing is true and correct. Executed on February 4, 2009.


Harry Greenberger

I, Kirk Hornbeck, declare as follows:

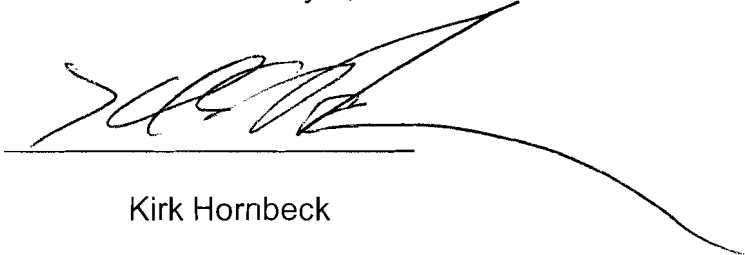
I am a citizen of the United States, a resident of the State of Maryland, a member of the Freedom From Religion Foundation ("FFRF"), and a member of the American Humanist Association ("AHA"). I have been an Atheist for more than forty years during which time I have viewed twelve inaugurations on television including the inauguration of President Obama on January 20, 2009. During each of these inaugurations, I felt excluded and relegated to second-class citizenship due to the repeated intrusion of specifically Monotheistic tenets by representatives of my own government.

On January 20, 2009, I proceeded to the National Mall with an admission ticket issued by our government through the JCCIC (Congressional Inaugural Committee). Although I arrived sufficiently early for this event, the entrances to the viewing areas on the Mall had been closed, and I subsequently located a room in the lower level of the Rayburn House Office Building where I viewed the speeches of Rick Warren, Joe Lowery, and the swearing-in of President Obama. I was appalled and outraged at the extent of a clearly Christian presentation at one of the most important functions of our democracy: the inauguration of the President of the United States. There were many Christians in this room as exemplified by their concurrent repetition of the Lord's Prayer with Rev. Warren, numerous comments of "God Bless America", obvious silent prayers, and a few audible "amen"s. And with Justice Roberts prompting President Obama with the words "So Help You God?", my Constitution - our Constitution - was re-written in the name of Monotheism.

I am 62 years old and love this country deeply - having served in the Armed Forces from 1968 through 1974. Government can be secular (as designed by our founding fathers) and perform the people's business without favoring one religion over another, or over no religion. I feel violated and harmed to a degree that is difficult to put into words. I expect to view at least five more inaugurations in my lifetime, and I would hope that the intent of the Constitution - to protect my fundamental religious rights against the voice of a vocal majority - will be upheld by our judicial system. I can rely on no one else to protect me.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 5, 2009.



Kirk Hornbeck

I, Richard Wingrove, declare as follows:

I am a citizen of the United States, a resident of the Commonwealth of Virginia, a member of American Atheists, a member of the Freedom From Religion Foundation (“FFRF”), a cofounder of Beltway Atheists, creator of the Assertive Atheist website, and an Atheist. On January 20, 2009, I was on the National Mall in Washington, DC, to view the inauguration of President Obama. Unable to get any closer, we watched the inauguration from a large screen near the Lincoln Memorial.

I was insulted and upset by the numerous references to the alleged Christian deity, and felt like the Christian religion was getting very special treatment and official endorsement by those involved in the inauguration which is a Constitutionally secular exercise. Given history’s unkind treatment of non-believers, it is easy to feel not only excluded, but threatened when government openly endorses a sectarian religious establishment.

As an involved, politically engaged citizen with a keen interest in the Constitutional Separation of Church and State, I will continue to participate in the political process and view many more inaugurations.

As an Atheist, I would like the powers that be to respect my Constitutional rights and recognize that Atheist rights enjoy exactly the same protections as any of the various religions and that, in that light, it is inexcusable for the Christian religion to continue to enjoy a blatantly favored position despite Constitutional prohibitions. This is a clear and ongoing violation of my Constitutional rights.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2009,



Richard Wingrove

I, Christopher Arntzen, declare as follows:

I am a citizen of the United States, a resident of the District of Columbia, a member of the American Humanist Association (“AHA”) and the Freedom From Religion Foundation (“FFRF”) and an Atheist. On January 20, 2009, I walked from my home in Washington, D.C. and joined the large crowd assembled on the national mall to view the inaugural ceremony on the large video displays that had been set up there.

Although I had friendly exchanges with many other persons around me in the crowd during the proceedings, I felt isolated and like an outsider on several occasions when references were made to religion and belief in God. During the presentation by Defendant Rev. Warren, many in the crowd around me adopted postures of prayer suitable to Protestant religious services, something I have not encountered in public before. I found the benediction given to be undignified, aggressively sectarian in tone, and offensive to someone who does not share the evangelical Protestant beliefs of the minister who delivered it.

I have had an active interest in politics and national events since an early age; and I have carefully followed coverage of presidential inaugurations on television beginning in 1965, at the age of 15. Ever since, I have watched televised coverage of every inaugural, usually live, or attended them on the national mall. Now at age 59 and in good health, I expect to continue this unbroken interest in national events throughout my lifetime and to attend or watch on television no fewer than five additional inaugurations after the one that occurred on January 20, 2009. I hope that I will not encounter another public event in which I have to attend religious services, especially of a sectarian nature, in violation of my rights under the Constitution.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 19, 2009,

A handwritten signature in cursive script, reading "Christopher Arntzen", written in black ink. The signature is positioned above a horizontal line.

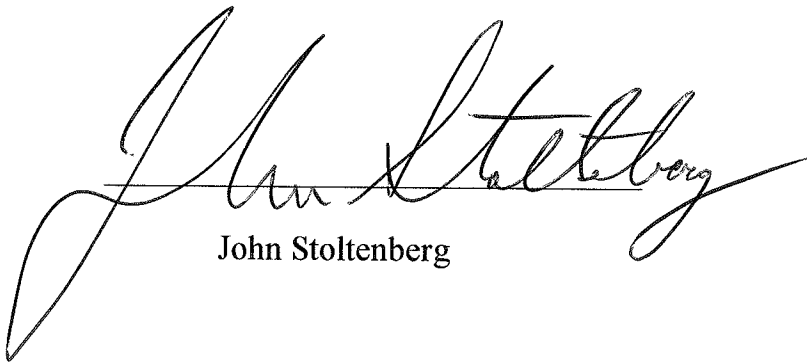
Christopher Arntzen

I, John Stoltenberg, declare as follows:

- (1) I am a citizen of the United States, a resident of the State of Wisconsin, a member of the American Humanist Association ("AHA") and the Freedom From Religion Foundation ("FFRF"), and a Freethinker/Atheist.
- (2) On January 20, 2009, I witnessed Barack H. Obama taking the presidential oath of office at my home on television.
- (3) It was enormously disappointing to see what should be a secular ceremony conducted by our secular government being used to promote the notion that Christian religion must be introduced into the ceremony in order for the ceremony to have legal standing.
- (4) I am seventy years old and have watched every inauguration since they were first put on television.
- (5) I plan to continue to watch future inaugurations until I die.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 7, 2009



John Stoltenberg

I, Katherine LaClair, declare as follows:

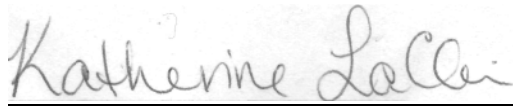
I am a citizen of the United States, a resident of the State of New Jersey, and a Humanist. I attended the inaugural ceremony on January 20, 2009 in Washington, D.C. on the Capitol Mall.

The repeated endorsements of a supernatural creator, "God," made me feel entirely excluded from the ceremony as a social and political outsider. Every individual I could see around me bowed their heads during Defendant Rev. Warren's recitation of the Lord's Prayer, as well as the invocation and benediction. Defendant Warren's blatant disregard for those of other faiths was infuriating, most notably his unwavering and repeated assertions that all of creation is due to a god.

As a responsible and engaged citizen, I intend to take part in every inauguration for the remainder of my life. At age 20 and in excellent health, I expect to view at least sixteen more inaugurations during my lifetime. I hope that my rights to religious freedom specified in our nation's Constitution will be respected and afforded to me for the duration of this time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 3, 2009.

A handwritten signature in cursive script that reads "Katherine LaClair". The signature is written in dark ink and is positioned above a horizontal line.

Katherine LaClair

I, Louis Altman, declare as follows:

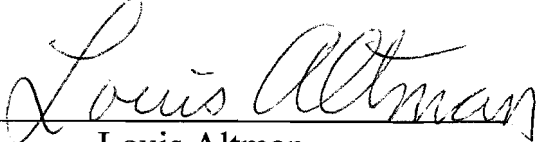
I am a citizen of the United States, a descendent of Jewish immigrants, a resident of the State of Illinois, a humanist, president of the Society for Humanistic Judaism, a member of the Freedom From Religion Foundation (“FFRF”), a member and director of the American Humanist Association (“AHA”), and a member of other organizations devoted, among other objectives, to keeping the government of this country secular in nature. On January 20, 2009, I viewed the inauguration of President Obama on television, just as I have viewed every presidential inauguration since 1960.

I was saddened by the repeated endorsements of belief in God, and felt clearly that I was a “political outsider” among the Christian Monotheists approving and participating in Defendant Rev. Warren’s recitation of the Lord’s Prayer, and bowing their heads during the invocation and benediction. These exercises in government-sponsored religious worship demonstrated clearly that, as a Jew and a non-believer, I am not a member of the favored religious group in my own country, and I am convinced that this is a violation of my constitutional rights.

Because I have a keen interest in our nation's government generally, and in the inaugural ceremonies in particular, I plan to view every future inauguration for the rest of my life. Being age 75 and in good health, I expect that I will view several more inaugurations. It is my hope that I won’t have to endure any further violations of my fundamental rights under the religion clauses of the Constitution at any of those ceremonies.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 3, 2009,


Louis Altman

I, Paul M. Case, declare the following:

- (1) I am a citizen of the United States, a resident of the State of Washington, a member of Seattle Atheists ("SA"), and an Atheist.

- (2) I viewed the Obama Presidential inauguration on a big screen projector live at work with several of my co-workers.


- (3) I was disappointed at the religious overtures- why do I have to hear a prayer at what is essentially a public ceremony?? It is clear that the Christian majority does not care to make the rest of us sit still through their prayers, but how would they feel if it was a religion they did not approve of? I doubt they would be as glib about a Scientologist-led prayer.

- (4) I viewed the 1993 and 2001 presidential inaugurations and was disappointed in the insertion of the Christian beliefs in those ceremonies, too.

- (5) I plan on watching future inaugurations for Presidents I vote for. I expect that gives me about ten more opportunities over my lifetime.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 23, 2009.



Paul M. Case

I, Jerry Schiffelbein, declare as follows:

I am a citizen of the United States, a resident of the State of Washington, President of Humanists of Washington ("HOW"), Treasurer of Seattle Atheists ("SA"), and Treasurer of Americans United For Separation of Church and State, Eastside Chapter ("AU"). I consider myself to be Secular Humanist, atheist, skeptic, and a Freethinker.

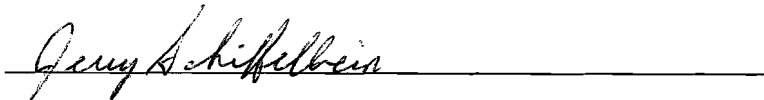
I was unable to view the 1993 inauguration due to a windstorm that knocked out power that day, and I was not able to view the 1997 presidential inauguration because I was at work that day. I did not view the 2001 or 2005 inaugurations as I did not believe the elections preceding them were legitimate. As such, the inauguration of President Barack Obama, which occurred on January 20, 2009, was the first I watched live on television. I still remember very clearly the feeling of pride and exuberance of watching history being made. For the first time in years, I felt like a true citizen of this country.

Unfortunately, this feeling was tarnished by the inclusion of the invocation given by Pastor Rick Warren. I felt that the prayer he gave was very sectarian and exclusive of people who do not believe in a "higher power." And while I support President Obama's First Amendment right to add "so help me, God" at the end of the 35-word presidential oath provided in the United States Constitution, I believe the unconstitutionality of this statement being added by Chief Justice John Roberts, Jr. was underscored by the fact that the participants felt it was necessary to retake the oath the following day after Chief Justice Roberts incorrectly administered the oath the first time.

As an American citizen vested in this country's political future, I plan to view every future inauguration for the rest of my life. At age 46 and in good health, I anticipate that this will include at least eight more inaugurations after the one that occurred on January 20, 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 03, 2009.

A handwritten signature in cursive script, reading "Jerry Schiffelbein", is written over a solid horizontal line.

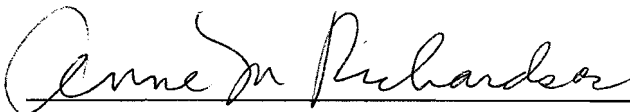
Jerry Schiffelbein

I, Anne M. Richardson, of Annandale, VA, declare as follows:

I watched the inauguration of Barak Obama on the Capitol Mall with my son, Jay. I was very disappointed to hear him say the words, "so help me, god," at the end of his oath. Although I was proud to be there and consider the election of President Obama to be a good thing for the country, the religious aspects of the inauguration do not belong there.

I will continue to attend future inaugurations and continue to fight against any religious language and rhetoric included in them.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 22, 2009.



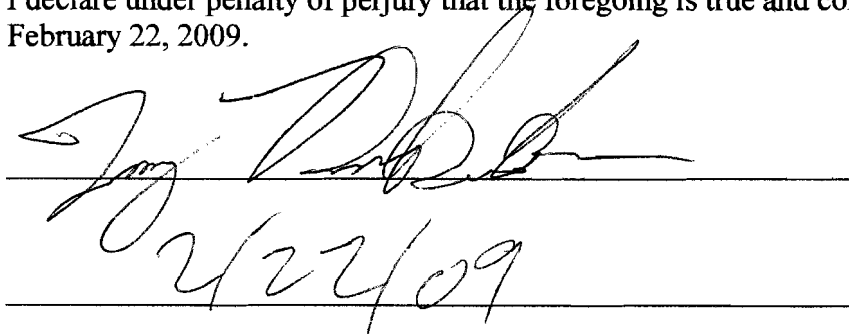
2/22/09

I, Jay R. Richardson, of Annandale, VA, declare as follows:

I watched the inauguration of Barak Obama on the Capitol Mall with my mother. I was sorry to hear the "so help me, god," at the end of his oath. As an atheist, I believe that these words are telling me that I am a second class citizen in the United States, and this is just not right. It is time the inauguration brought itself more in line with what is in the Constitution of the United States.

I will continue to attend future inaugurations.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 22, 2009.



A handwritten signature in cursive script, appearing to read "Jay Richardson", is written above a horizontal line. Below this line, the date "2/22/09" is handwritten in a similar cursive style, also positioned above a second horizontal line.

I, Daniel Dugan, declare as follows:

I am a citizen of the United States, a resident of the State of California, and a Secular Humanist. On Inauguration Day I was recording nature sounds on the Upper Yosemite Falls Trail in Yosemite National Park. I watched a television recording of the 2009 Inaugural ceremony at my earliest opportunity when I returned home the evening of the next day.

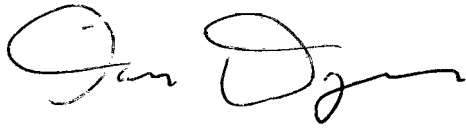
I was offended by the elaborate prayer of Pastor Rick Warren, and the addition of "So help me God" to the oath of office.

I have watched every inauguration since 1961. I expect to see at least four more after 2009. I am passionate about the Establishment Clause, and I am concerned about the intrusion of religion into public life. I want public ceremonies to be neutral about religion. I do not accept any prayer as being "ceremonial," "generic," or "non-sectarian."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 3, 2009,

Daniel Dugan

A handwritten signature in black ink, appearing to read "Dan Dugan", written in a cursive style.

I, Anna Mae Andrews, declare as follows:

I am a citizen of the United States, a resident of the State of California, and a member of the American Humanist Association and a member of the Atheists and Other Free Thinkers (AOF) of Sacramento. I watched the inauguration of President Barrack Obama on television on January 20, 2009. I'm dismayed that chaplains were brought in to pray to their God during the swearing in of a political, civil, elected official for our civil government. A president represents all of us, religious or not, and I feel discriminated against, and offended, to have religion and prayers at the inauguration. I've either heard (on the radio) or seen (on television) all the inaugurations since the 1950s. I won't be a witness to further inaugurations because I'm tired of being exposed to the governmental endorsements of monotheism. I've seen too many inaugurations that don't reflect our secular nation. I would otherwise like to view the inaugurations as a part of my history.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 6, 2009,



Anna Mae Andrews

I, Eliza L. Sutton, declare as follows:

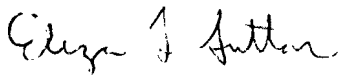
I am a citizen of the United States, a resident of the State of Washington, a member of the Freedom From Religion Foundation (“FFRF”), the American Humanist Association (“AHA”), Seattle Atheists, and a lifelong Atheist. On January 20, 2009, I listened live on the radio to the presidential inauguration ceremony, including the invocation, oath of office, and benediction. Later that day, I watched the proceedings on a video online. My ten-year-old son had watched the inauguration at his (secular) school earlier that day without me.

Listening to the ceremony brought me tears of frustration and a sense of isolation. I felt excluded from the proceedings of this Constitutionally mandated transfer of my government’s administration, due to repeated statements in the proceedings which assumed and seemed to advocate belief in God and in monotheism: Rev. Rick Warren’s invocation (which ended with the Lord’s Prayer from the Christian Bible); Chief Justice John Roberts’ administration of the oath of office (which ended with, “So help you God?”); and Rev. Joseph Lowery’s benediction. Watching the same proceedings later, and seeing what my son had seen, filled me with unease, knowing that he is being exposed to the same government-approved assumptions about monotheistic belief that have led me to feel like a second class citizen in this country for most of my life.

Because I have a strong interest in our nation's government and Constitution, including the Constitutionally-mandated inauguration of our presidents, I plan to view every future inauguration for the rest of my life. Being age 45 and in good health, I expect that I will view at least nine more inaugurations. It is my clear hope that I won’t have to endure any further violations of my fundamental rights under the religion clauses of the Constitution at any of those future presidential inaugurations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 5, 2009,



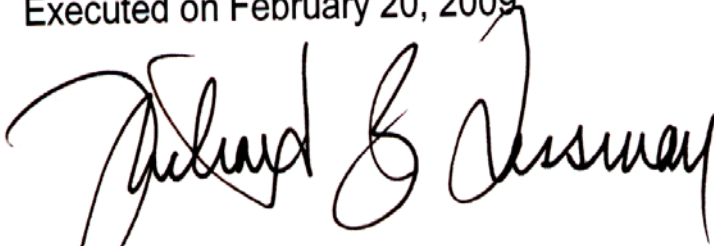
Eliza L. Sutton

I, Richard B. Ressman, M.D. declare as follows:

1. I am a citizen of the United States and a resident of the State of California.
2. I am a member of Americans United for Separation of Church and State.
3. I consider myself a seldom practicing Jew.
4. I have watched the inaugurations from 1961 until the present on television at my homes from Illinois to California.
5. I watched the 2009 inauguration of Barack Obama live on television at my home.
6. As I watched this inauguration, I resented the references to god in the oaths and the use of a bible.
7. Being sixty-seven years old, I expect to witness at least five future inaugurations during my lifetime.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 20, 2009

A handwritten signature in black ink, appearing to read "Richard B. Ressman". The signature is written in a cursive, flowing style with large loops and a prominent initial "R".

Richard B. Ressman, M.D.
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- (22) JAY RICHARDSON
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