

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**

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**PLAINTIFFS' FIRST AMENDED COMPLAINT, APPENDIX G  
REDACTED DECLARATIONS OF NEW INDIVIDUAL PLAINTIFFS  
#4 OF 8 (J-L)**

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MICHAEL NEWDOW  
*In pro per and pro hac vice*  
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SACRAMENTO, CA 95823

(916) 427-6669  
[NewdowLaw@gmail.com](mailto:NewdowLaw@gmail.com)

ROBERT V. RITTER  
DC BAR #414030  
AHA – 1777 T STREET, NW  
WASHINGTON, DC 20009

(202) 238-9088  
[BRitter@americanhumanist.org](mailto:BRitter@americanhumanist.org)

# ***Michael Jacobson***

P. O. BOX 97794, LAS VEGAS, NV 89193

I, Michael Jacobson, declare as follows:

I am a citizen of the United States and a resident of the State of Nevada.

I am a member of Freedom From Religion Foundation, American Humanist Association.

I consider myself an atheist.

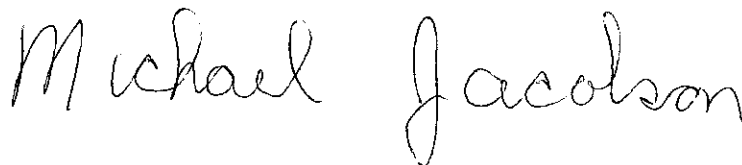
I have seen on television every inauguration since 1963. I watched the 2009 inauguration of Barack Obama live on television at my home, and later on the Internet and TV replays.

As I watched this inauguration, I was appalled that Chief Justice Roberts, sworn to uphold the Constitution, took it upon himself to change the Oath of Office as written in the Constitution and add "... So help you God." The Chief Justice must have been aware that Michael Newdow had filed a restraining suit on this very issue. And he still proceeded with his own modified oath.

Being 64 years old, I expect to witness 5 future inaugurations during my lifetime.

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

Executed on February 18, 2009.

A handwritten signature in black ink that reads "Michael Jacobson". The signature is written in a cursive, flowing style.

Residence: 10634 Rancho Destino Road  
Las Vegas, Nevada 89183

## Declaration

I, Robert E. Jochums, Jr., declare as follows:

I am a citizen of the United States and a resident of the State of Georgia.

I am a member of the Freedom From Religion Foundation.

I consider myself an atheist.

I have watched many of the presidential inaugurations over the past thirty-six years on television at my home.

I watched the 2009 inauguration of Barack Obama live on television at my home.

As I watched this inauguration, I felt, for the most part, a great sense of pride.

I was disappointed, however, that the inclusion of Christian prayers in the ceremony and the phrase "so help me God" in the oath sent a message of exclusion to me and other either non-Christian or nonreligious Americans.

Being 59 years old, I expect to witness, hopefully, a handful or more future inaugurations during my lifetime.

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

Executed on February 13, 2009.

A handwritten signature in black ink, appearing to read "Robert E. Jochums, Jr.", with a long horizontal flourish extending to the right.

Robert E. Jochums, Jr.

I, *Troy Paul Johnson*, declare as follows:

I am a citizen of the United States, a Marine Corps Veteran, an Operation Enduring Freedom Veteran, a current drilling reservist and a resident of the State of Minnesota.

I have been a member of Freedom from Religion Foundation and Minnesota Atheists.

I consider myself an atheist.

I have watched the inaugurations of 1993 while in the Marine Corps, and 1997 and 2001 while completing a degree in Information Technology. I watched the 2005 inauguration at home, shortly after returning from a military deployment.

I watched the 2009 inauguration of Barack Obama live on television while at work, and later on the Internet.

As I watched this inauguration, I was thrilled to finally hear a president mention people of "no faith", because we are, in fact, a significant part of this nation.

Being 36 years old, I expect to witness 11 inaugurations during my lifetime. Just as many in this nation felt they could only hope see the first African American president in their lifetime, I hope for the time when Non-theists are considered the valid and significant part of this nation.

I hope that all people of "faith" will someday follow in Rev. Joseph Lowery's words when he asked that we, "...make choices on the side of love, not hate; on the side of inclusion, not exclusion; tolerance, not intolerance."

That day will come when it is understood that Non-theists' love their fellow humankind, when they are tolerated in government and are they not excluded from a presidential inauguration.

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

Executed on February 20, 2009.



Troy P. Johnson

I, Linda W. Jones, declare as follows:

I am a citizen of the United States and a resident of the State of Virginia.

I consider myself an atheist.

I watched the 2009 inauguration of Barack Obama live on television at my home.

As I watched this inauguration, I was very unhappy that the oath included the words, so help me God, which imply that a person cannot be President of my country unless he acknowledges God. I also was very uncomfortable with the prayers that were part of the ceremony. They made me feel that I am not considered an equal citizen of this country.

Being 61 years old, I expect to witness 5 or more future inaugurations during my lifetime.

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

Executed on February 19, 2009.

A handwritten signature in cursive script, appearing to read "Linda W. Jones", with a large, sweeping flourish at the end.

Linda W. Jones  
208 Anchor Lane  
Yorktown, VA 23692

I, \_\_\_\_\_ declare as follows:

1. I am a citizen of the United States and a resident of the State of Delaware.
2. I am a member of the American Humanist Association, the Delaware Association for Humanism, Secular Coalition of America and the Freedom From Religion Foundation.
3. I consider myself an atheist.
4. I watched the 2009 inauguration of Barack Obama live on television at my workplace cafeteria along with dozens of other witnesses to this historic event.
5. As I watched this inauguration, I was dismayed by the sectarian prayers delivered by the clergy and the insertion of the prompt, *so help me god*, by Chief Justice Roberts at the close of the oath. Rick Warren's leading of the Lord's Prayer was especially polarizing. Only Christians would be familiar with this prayer and Warren's other references to Jesus Christ in his appeal. As a non-believer I find these words without substance or relevance to the occasion. They would be appropriate if uttered in a Christian church not an event to mark the ascent of the new leader of our secular republic. Should someone at a future inauguration choose to deliver an invocation, it would be far better for them to voice our shared desire for building a more just society and upholding the Constitution of the United States. May they invoke these high ideals with eyes open to the challenges ahead rather than with heads bowed in prayer to a particular god.
6. Being 39 years old, I expect to witness perhaps at least ten additional inaugurations during my lifetime.
7. I have one child who will be 14 years old when the next inauguration occurs in 2013. Clergy led prayers and religious deference offered during a government sponsored event, send the message to young people that it is desirable, preferable and a given to be of the faith of the majority; that those individuals will have a place and a voice in a very public way. The implied message is that the voices of other faiths or no faith can be ignored. Our children will be future members of the body politic and deserve a government which recognizes them as full citizens in word, deed and ceremony regardless of religious affiliation or lack thereof.

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

Executed on February 20, 2009.

I, Ronald A. Jones, declare as follows:

I am a citizen of the United States and a resident of the State of Virginia.

I consider myself an atheist.

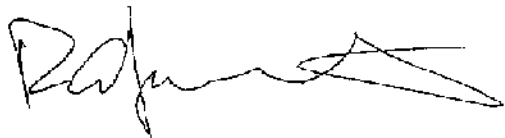
I watched the 2009 inauguration of Barack Obama live on television at my home.

As I watched this inauguration, I was very unhappy that the oath included the words, so help me God, which imply that a person cannot be President of my country unless he acknowledges God. I also was very uncomfortable with the prayers that were part of the ceremony. They made me feel that I am not considered an equal citizen of this country.

Being 60years old, I expect to witness 5 or more future inaugurations during my lifetime.

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

Executed on February 19, 2009.

A handwritten signature in black ink, appearing to read 'Ronald A. Jones', with a stylized flourish at the end.

Ronald A. Jones  
208 Anchor Lane  
Yorktown, VA 23692

I, George Francis Kane, declare as follows:

1. I am a citizen of the United States and a resident of the State of Minnesota.
2. I am the Secretary and Public Relations Officer of Minnesota Atheists, and a member of the Humanists of Minnesota, the Freedom from Religion Foundation, American Atheists and Americans United for Separation of Church and State.
3. I consider myself a strong atheist, a weak agnostic, as well as a skeptic, rationalist and freethinker.
4. I have watched many inaugurations on television, beginning in 1961.
5. I watched the 2009 inauguration of Barack Obama live on television at my home.
6. As I watched this inauguration, I felt excluded by speeches that should have appealed to the commonality of Americans on this historic occasion, the explicitly religious invocation and benediction. I listened especially for whether Justice Roberts would amend the constitutionally prescribed oath of office by adding an oath to god at the end. Indeed he did, although he phrased it as a question, "So help you god?"

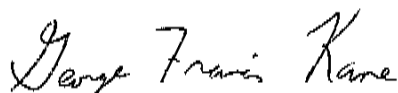
That night I saw a television report that Roberts had re-administered the oath of office, to correct his deviation from the precise wording specified in the Constitution. I was very upset to know if he omitted the concluding oath to god, which would seem to be required by that purpose. I could find no reference to that point on any Internet report, and no one could answer the question when I posted it to the Atheist Nexus discussion forum.

The next morning I was very disappointed when I heard an audio recording of the second oath of office. Indeed, Justice Roberts, who was so concerned to place the word "faithfully" in the proper spot, capriciously violated the pure secularity of the oath intended by the Founding Fathers. I believe that it was an intentional insult motivated by his animosity towards atheists and designed to exclude them from the national celebration of the inauguration of the president.

7. Being 60 years old, I expect to witness three or four future inaugurations during my lifetime.

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

Executed on February 20, 2009.



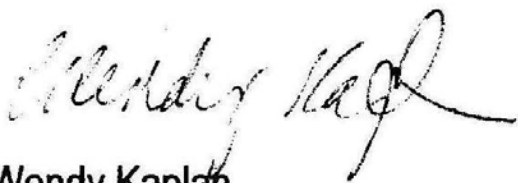
George Francis Kane  
1280 Larpenteur Ave. W #210  
St. Paul, MN 55113



I, Wendy Kaplan, declare as follows:

- I am a citizen of the United States and a resident of the State of Wisconsin.
- I am a member of the Freedom From Religion Foundation.
- I consider myself an atheist and free thinker.
- I have watched inaugurations in 2001 and 2005.
- I watched the 2009 inauguration of Barack Obama live on television at work with my co-workers and later again on television at home. As I watched this inauguration, I was saddened that I and others who do not believe in god were excluded during the prayer portion of the inauguration.
- Being 53 years old, I expect to witness approximately 9 future inaugurations during my lifetime.
- I believe it is detrimental to minor children who do not believe in god to be forced to witness clergy-led prayer as it may diminish their self esteem.
- I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 13, 2009.



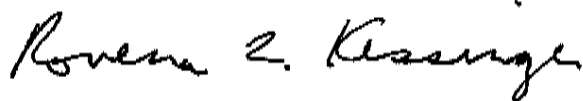
Wendy Kaplan  
February 13, 2009

I, Rovenia L. Kessinger, declare as follows:

1. I am a citizen of the United States and a resident of the State of Wisconsin.
2. I am a member of the Freedom From Religion Foundation.
3. I consider myself an atheist.
4. I watched the 2009 inauguration of Barack Obama live on television at work.
5. As I watched this inauguration, I was extremely unhappy and offended at the addition of the purely religious phrase "so help me god" by Chief Justice Roberts.
6. Being 44 years old, I expect to witness at least ten more future inaugurations during my lifetime.

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 "Rovenia L. Kessinger". The signature is written in a cursive, flowing style.

Rovenia L. Kessinger, M.D.

I, Susan L. Kirby, declare as follows:

I am a citizen of the United States and a resident of the State of Texas.

I am a life time member of the Freedom From Religion Foundation.

I consider myself an atheist.

I watched the inaugurations of R. Reagan, G.H.W. Bush, G. W. Bush, and W. J. Clinton on television at my home.

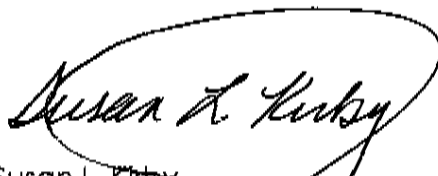
I watched the 2009 inauguration of Barack Obama on television at my home.

As I watched this inauguration, I was pleased with the mention of "non-believers" but felt excluded by the religious and faith references. I especially found the clergy-led prayers to be exclusive of non-theists. I also felt that the inclusion of the words "so help me God" by Justice Roberts were inappropriate as these words are not found in the oath of office in the U. S. Constitution.

Being 49 years old, I expect to witness several more future inaugurations during my lifetime.

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

Executed on February 17, 2009.

A handwritten signature in black ink that reads "Susan L. Kirby". The signature is written in a cursive style and is enclosed within a large, hand-drawn oval.

Susan L. Kirby  
232 West Sierra Circle  
San Marcos, TX 78666

I, Donna J. Knox, declare as follows:

I am a citizen of the United States and a resident of the state of Oklahoma. I am a member of the Freedom From Religion Foundation. I consider myself an atheist.

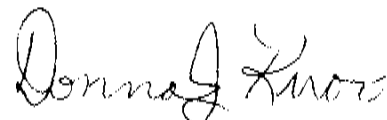
I have watched on television the presidential inaugurations of Barack Obama, George W. Bush, Bill Clinton, George H. W. Bush, Ronald Reagan, Jimmy Carter, Gerald Ford, Richard Nixon, Lyndon B. Johnson, and John F. Kennedy.

As I listened to Chief Justice John Roberts administer the oath of office and ask at the end of the oath "so help you God?," my jubilation over the event became clouded with sadness. I was sad to see that the false message that our government is a Christian government is still being disseminated. And as I watched and heard prayers being broadcast across the nation on that day, my anxiety was renewed about my country potentially becoming a theocracy instead of a democracy.

Being 62 years old, I expect to witness perhaps six future inaugurations during my remaining lifetime. I have grandchildren who are still young and impressionable as well as a one-year-old great grandson. I'm certain that my great grandchild will become and my grandchildren will continue to be unaware of the unconstitutionality of the reference to a god in the oath unless that phrase is dropped from it in the future. If my grandchildren continue to hear the oath being repeated incorrectly and witness religious prayers as part of inaugurations, they will likely assume we are a nation based upon religion. This is dangerous because it could unwittingly lead us deeper into a theocracy. And that would be disastrous for the United States because it would exclude citizens of religions other than Christianity as well as those with no religious faith. I want my grandchildren to live in freedom and liberty in the U.S.A.

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

Executed on February 16, 2009.



Donna J. Knox  
1017 Ninth Street, Apt. A  
Alva, Oklahoma 73717-3159

I, \_\_\_\_\_ declare as follows:

1. I am a citizen of the United States and a resident of the state of Kansas.
2. I am a member of the Freedom From Religion Foundation, the Military Association of Atheists and Freethinkers and the Secular Coalition of America.
3. I consider myself a freethinker and secularist.
4. I listened to the 2009 inauguration of Barack Obama live on the radio.
5. As I listened to this inauguration, I was disturbed at the use of sectarian prayer both before and after the inaugural event. I feel it was a poor representation of the constitutional value of the United States to hold the government responsible for maintaining a neutral stance on matters of religion. It certainly made apparent that Christianity is at the head of the table in this country and those who hold other belief systems and those who hold no religious beliefs are second class citizens. I was also dismayed by Chief Justice Roberts changing the oath of office as it is written in the Constitution by placing the phrase "so help you god?" at the end of the oath in question form.
6. Being 40 years old, I expect to witness at least ten future inaugurations during my lifetime.
7. I have three children under the age of 18. They are \_\_\_\_\_ age 15, \_\_\_\_\_ age 13 and \_\_\_\_\_ age 10. At all three children's schools the inauguration of President Obama was played on television live during the school day. The students were given no choice in the matter of whether to watch or not. I feel that exposing them to the reverend Rick Warren's prayer invoking his particular god and reciting "The Lord's Prayer," a sectarian prayer spoken only by Christians actually put the school system in the precarious position of choosing to air an historical event which contained highly Christian and sectarian religious overtones. This gave nothing but tacit acceptance and approval by the district to a blatantly unconstitutional behavior by our government. The inauguration belongs to the people, not to the particular president being inaugurated that year.

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

Executed on February 20th, 2009

I, Don Koch, declare as follows:

I am a citizen of the United States of America and a resident of the State of Colorado.

I am a member of The Freethinkers of Colorado Springs, Colorado Springs, Colorado.

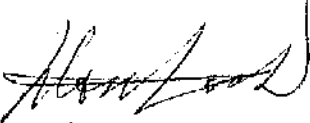
I consider myself an "atheist".

I watched the 2009 inauguration of Barack Obama live on television at my home. I was very offended and felt I was being taken advantaged of in having to listen to clergy led prayers and the words "so help me God" in Obama taking the oath of office.

Being 72 years of age, I expect to witness 4 future inaugurations in my lifetime.

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

Executed on February 19 2009,

A handwritten signature in black ink, appearing to read "Don Koch", written over a horizontal line.

Don Koch  
10 North 33<sup>rd</sup> Street  
Colorado Springs, Colorado 80904

I, Travis Kottow, declare as follows:

I am a citizen of the United States and a resident of the State of Virginia.

I am a member of Tidewater Atheist Group

I consider myself a rational human being.

I have watched the inaugurations of 2001 and 2005 on television.

I watched the 2009 inauguration of Barack Obama on the Internet.

As I watched this inauguration, I became increasingly irritated, I have no problem with our president being religious but I do have a problem with his religion being incorporated into my country. Why should the entire country be forced to go to his church ceremony, he can have a secular inauguration and then have his personal ceremony and even invite the whole country there if he wishes. Let his church pay for it. I'm sure that the news crew would be there too, I just wouldn't watch it.

Being 23 years old, I expect to witness at least ten future inaugurations during my lifetime.

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

Executed on February 19, 2009.



Travis Kottow  
440 Honey Locust Way  
Chesapeake, VA 23320

I, Marilyn LaCourt, declare as follows:

I am a citizen of the United States and a resident of the State of Wisconsin.

I am a member of Freedom From Religion Foundation, American Atheists, Atheist Alliance International, and Southeast Wisconsin Free Thinkers.

I consider myself an atheist and a humanist.

I watched the 2009 inauguration of Barack Obama live on television at my home, and later on the Internet.

I watched this inauguration with mixed emotions. I voted for Obama, and I was excited about the festiveness of the event. I was angry when Rick Warren did his God speech and simply assumed he was talking to all Americans when he invoked his God. But the biggest disappointment came at the swearing in. I expected Obama to say "So help me God" at the end of it. He makes no secret about his Christianity. But, I didn't expect Chief Justice Roberts to "require" him to do so. I didn't expect Roberts to add those words making it impossible for our president NOT to say them had he chosen not to. To my knowledge, those words are not part of the official swearing in. They are optional.

I thought to myself, what if we had a president who is not a believer? Would that make the swearing in a farce? Would a president who is not a believer and said those words anyway make the whole thing a lie? Would the swearing in be a non-binding hypocrisy, null and void? An apostasy?

It's one thing if a president elect chooses to add those words, it's quite another when they are required as part of the swearing in.

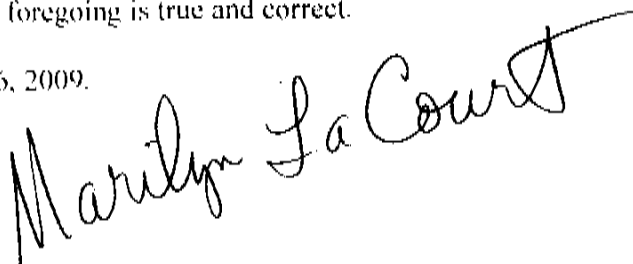
I am 74 years old. I don't expect to be around to witness many more inaugurations myself. However I have three living children and two very bright and active daughters in law who are atheists. They take their responsibility to vote very seriously. I am proud to say that I have five living grandchildren, all adults, who are atheist free thinkers, and three living Jewish grandchildren who are also freethinkers, all of whom support the separation of church and state. I have five step grandchildren who are Christians. They also support the separation of church and state.

My children, their atheist spouses, and my biological grandchildren get the message loud and clear, they are not considered patriotic citizens of the country of their birth.

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

Executed on President's Day, February 16, 2009.

Marilyn LaCourt  
14220 Forest View Lane  
Brookfield Wisconsin 53005  
262-821-0888





I, \_\_\_\_\_ declare as follows:

I am a citizen of the United States, a resident of the State of New Hampshire, a member of the Freedom From Religion Foundation (“FFRF”), and a Secular Humanist. I viewed the inauguration at my place of work, projected onto a large screen, on January 20, 2009.

I was shocked at the number of references to God and religion and it distracted me greatly from enjoying the ceremony. I was so dismayed by Rev. Warren’s words that I started searching for reactions on Twitter. I immediately found many people asking about whatever happened to the separation of church and state? And then I heard Warren mention Jesus, and I turned to one of my colleagues and said, “Did he just praise Jesus?” She said, “Yes, but I guess it could be worse.” By this time I felt so excluded and disrespected that it was difficult to restore my previous feeling of excitement about our first day with an historic new president.

My daughters watched Obama’s inauguration ceremony and speech at the local public school. When I asked my 11-year-old about it, she said, “The bible was ok, because I mean it was *Lincoln’s* bible! And he didn’t actually read anything from it, he just put his hand on it. But I didn’t like all the God talk. Isn’t that against the law?”

In addition to 2009, I viewed the inaugurations of 1997, 2001, and 2005 on television. I plan to view every future inauguration for the rest of my life. Being age 39 and in good health, I expect that I will view at least ten more inaugurations and will likely view at least three of those in the company of one or more of my children.

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

Executed on February 5, 2009

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I, ZoAnn Lapinsky, declare as follows:

I am a citizen of the United States and a resident of the State of Texas.

I am a member of the Freedom From Religion Foundation and the Escapees Freethought Birds of a Feather group.

I consider myself an atheist.

To the best of my knowledge, I have watched the inaugurations of every President of the United States since John F. Kennedy was inaugurated in 1961. I know for certain that I have watched the inaugurations in 2001, 2005, and 2009.

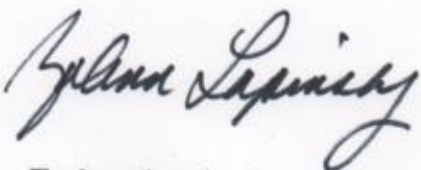
I watched the 2009 inauguration of Barack Obama live on my television at home, and re-watched it later on the Internet.

As I began to watch this inauguration, I felt proud to be an American citizen and to be able to witness my government at its best. However, when the religious oath was given, and when official prayers were said, my emotion changed to disappointment. I felt separated from my country, unwanted by my country, and removed from my country's process of government.

Being 56 years old, I expect to witness 4 future inaugurations during my lifetime.

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

Executed on February 18, 2009.



ZoAnn Lapinsky  
106 Rainbow Drive #674  
Livingston, Texas 77399

I, Eric R. Last, 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 the Skeptic Society.
3. I consider myself an atheist.
4. I watched much of the television coverage of the 2009 inauguration of Barack Obama at home on television, and listened to a portion of the inauguration on the radio in my car as I drove to work. I later saw the actual oath on the internet.
5. As I watched/listened to this political event, I was disappointed by the intrusion of religion in the form of the prayer delivered by Rev. Rick Warren. And when I heard to the actual oath given by President-elect Obama, I was even more disappointed that this oath included a totally unnecessary reference to God. As a non-religious American whose beliefs regarding religion should supposedly be as respected as anyone else's, I resent that the oath makes reference to God. I feel that this represents a public repudiation of my beliefs. And I found myself wondering, what if I were elected President? Of course this will never happen, but what if a fellow atheist were elected? Would this person be expected to repeat "so help me God" as a condition of assuming the presidency? Would this not be a total violation of this person's religious freedom? Does this country assume that a person who believes as I believe is unworthy of holding this office? Perhaps an atheist President-elect would not be required to say "so help me God" – I really don't know. But regardless, the message being sent to non-theists such as myself seemed to be - "you are unworthy of holding this office".
6. Being 50 years old, I hope to witness perhaps five or more future inaugurations during my lifetime. I hope that in the future I can watch this without feeling like my viewpoint is being trampled on.

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

Executed on February 19, 2009.



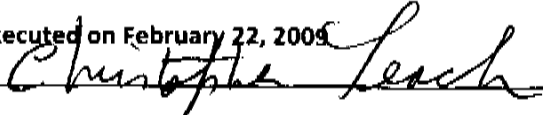
Eric R. Last  
2230 Pinecrest Drive  
San Bruno, CA 94066

I, *Christopher Leach*, declare as follows:

1. I am a citizen of the United States and a resident of the State of Connecticut.
2. I am a member of American Atheists, the Freedom From Religion Foundation and the Atheist Humanist Society of Connecticut and Rhode Island.
3. I consider myself an atheist.
4. I have watched every presidential inauguration live since President Jimmy Carter through the Inauguration of President Barack Obama this year on TV in my home
6. As I watched this inauguration, I resented the fact that blatant religious statements and prayers and pleadings to god or a 'god' were part of the ceremony. This struck me as clear violation of our constitution and a continued insult to the principle of separation of church and state. A public figure should not be sworn in by placing his hand on the bible and the ending words so often used, 'so help me god' are not in the swearing in verbiage called for in Article II Section 1 of our constitution. We are not and should not resemble a theocracy in any way. It is offensive or should be to all citizens that religious ceremonial spokespeople or a Justice of the Supreme court is allowed to interject any Invocations to god during a public ceremony.
7. Being 70 years old, I expect to witness *all* future inaugurations during my lifetime.
8. I have 6 grandchildren aged 3 to 12, and 5 of which watched the last Inauguration on TV. All 6 will be minors during the 2013 presidential inauguration. Their parents and I are raising the aforementioned children to be independent responsible citizens, to think for themselves and to recognize that religious beliefs have no place in government or public schools. The use of clergy, prayer and stating 'so help me God' in a presidential inauguration is an example of government support of religion and sends the message to our children that goes against the principle of separation of church and state. This is unfair and it is wrong and it is against the constitution.

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

Executed on February 22, 2009



\_\_\_\_\_

Christopher Leach

23 Partridge Hollow Rd.

Gales Ferry, CT 06335

I, Lawrence S. Lerner, 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 the Freedom From Religion Foundation and the American Humanist Association.
3. I consider myself an atheist.
4. I have watched the Presidential inaugurations of 1981, 1985, 1989, 1993, 1997, 2001, and 2005 on television at my home.
5. I watched the 2009 inauguration of Barack Obama on television at my home.
6. As I watched this inauguration, I felt myself excluded from full citizenship in the United States by the religious references embodied in the invocatory and benedictory prayers, and by the religious reference added to the Constitutional oath of office by Chief Justice Roberts.
7. Being 74 years old, I expect to witness two or three future inaugurations during my lifetime.

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

Executed on February 22, 2009.

A handwritten signature in black ink, appearing to read "Lawrence S. Lerner". The signature is written in a cursive, flowing style with a long horizontal tail stroke.

Lawrence S. Lerner  
10 Stadler Drive  
Woodside, CA 94062

I, Carol Leung, declare as follows:

I am a citizen of the United States and a resident of the State of California.

I am not associated with any religious organization.

I consider myself an non-believer.

I have watched the inaugurations of 1993, 1997, and 2009 on television at my home.

I watched the recorded 2009 inauguration of Barack Obama on television at my home.

As I watched this inauguration, I was overwhelmed with emotions that we have finally elected an African-American as the president. I was so excited and proud that I was part of this historical event. However, I also felt so uneasy and frustrated by the statement of "so help me God" and clergy-led prayer. Why is it the majority has to force the minority to accept their religious belief? There is absolutely no reason why the religious statement of "so help me God" was included in any government-sponsored gatherings. The same is true for clergy-led prayer(s). It should not be there. The practice if religion is a private issue and should be treated as such; therefore, it should never be sponsored by the government.

Being 53 years old, I expect to witness eight more future inaugurations during my lifetime.

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

Executed on February 18, 2009.



Carol Leung  
3636 Eastridge Drive  
San Jose, CA 95148

I, Granville Leung, declare as follows:

I am a citizen of the United States and a resident of the State of California.

I am a member of Freedom From Religion Foundation.

I consider myself an atheist.

I have watched the inaugurations of 1993, 1997, and 2009 on television at my home.

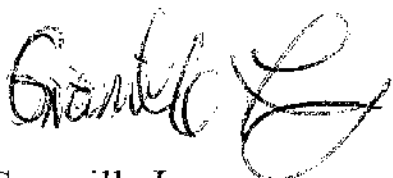
I watched the 2009 inauguration of Barack Obama live on television at my home, and later on the Internet.

As I watched this inauguration, I was deeply moved at how far American politics has progressed. It is certainly an historical event of unequal proportion. However, I was deeply disturbed by the statement of "so help me God" and clergy-led prayer. United States was not found as a Christian nation as documented by a treaty with Tripoli, drafted in 1796 under George Washington and signed by John Adams in 1797 (Art. 11). Therefore, the religious statement of "so help me God" and the clergy-led prayer(s) are definitely offensive to me. I feel that my life is being intruded by religion.

Being 52 years old, I expect to witness seven more future inaugurations during my lifetime.

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

Executed on February 17, 2009.

A handwritten signature in black ink, appearing to read "Granville Leung". The signature is stylized and cursive.

Granville Leung  
3636 Eastridge Drive  
San Jose, CA 95148

I, Gerald J. Lewis, declare as follows:

I am a citizen of the United States and a resident of the State of Wisconsin.

I am a proud member of the Freedom from Religion Foundation and consider myself to be agnostic.

I have watched every US Presidential Inauguration since Reagan's 1985 inauguration (1985, 1989, 1993, 1997, 2001, 2005...) on television from my home or from my place of employment.

This year, I watched the 2009 inauguration of Barack Obama live via Internet streaming video while at work in a government office with co-workers, and later watched replays of it on TV and the Internet with my wife at home.

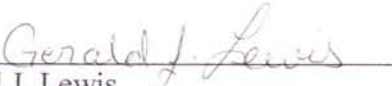
As I watched this inauguration, I was filled with hope, pride, and patriotism at this truly historic event; but at the same time, was insulted to hear a reference to a deity being added to the Oath of Office, as if to say that to be an American President required one to be a Christian, and that to be an American required one to be Christian as well. That single moment signaled to me that I was less of a citizen than the Christian sitting next to me.

Being 38 years old, I expect to witness at least ten future inaugurations during my lifetime.

My wife and I plan to have children, and when we do, I'll watch future inaugurations with them. I'll teach them the importance of the event, what it means to be an American, and how valuable, important, and rare our Constitution is. I'll also have to explain to them why the US Constitution (and other documents) put forth that this country does not favor one religion over another, while the Oath of Office that is being given clearly shows those in high office favor Christianity and denigrate all other beliefs as trivial. I'll have to explain the risks of my children expressing their faith in public, and the ridicule and hate that they will receive if they do (while others freely express their majority faith without this same fear), while somehow trying to explain that at least on paper (US Constitution), that it isn't supposed to be that way... that the US President is supposed to represent all Americans, not just those who believe in a specific religion, that this country belongs to all citizens of every faith AND non-faith.

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

Executed on February 14<sup>th</sup>, 2009.

  
Gerald J. Lewis  
53 Hawks Landing Circle #3  
Verona, WI 53593



I, June Haiyan Li, declare as follows:

I am a permanent residence of the United States and a resident of the State of minnesota.

I am a member of Freedom From Religion Foundation, minnesota atheist and atheists for human rights .

I consider myself an atheist.

I watched the 2009 inauguration of Barack Obama live on television at my home.

As I watched this inauguration, I was so excited to watch the history unfold. American is a land of opportunity. A son of immigrant from African can become president of USA. However, I was disappointed about the phrases of "So help me God".

Being 37 years old, I expect to witness 9 future inaugurations during my lifetime.

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

Executed on February 18, 2009.



June Haiyan Li  
11702 Emery Village Dr. N  
Champlin, MN  
55316

I, Anne-Rosemarie Lieb, declare as follows:

I am a citizen of the United States and a resident of the State of Pennsylvania

I am a member of such as Freedom From Religion Foundation, American Humanist Association, Atheist Alliance International. I am active on Internet Forums in support of atheists as honorable citizens.

I consider myself an "atheist" and "humanistic",

I have watched the inaugurations of 1989, 1993, and 2005 on television at my home, and I watched the inauguration of 2001.

I watched the 2009 inauguration of Barack Obama "live on television at my home, and later on the Internet".

As I watched this inauguration, I was saddened and disappointed to see such a fine man of intellect, a pillar of dignity and taste, be 'sworn' into office with his hand in a book of ancient mythology, and by custom be made to utter the words 'So Help Me God'.

Being SEVENTY years old, I expect to witness perhaps two future inaugurations during my lifetime.

My children watched the inauguration, as did my grandchildren. What kind of world are they facing, when their country's leader trusts his conscience and mind to laws in a book of such violence, superstition, and bloodshed?

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

Executed on February , 17<sup>th</sup> , 2009.



Anne-Rosemarie Lieb  
PO Box 203  
Lackawaxen, PA 18435

I, \_\_\_\_\_ 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 *Freedom From Religion Foundation and Center for Inquiry*.
3. I consider myself a *atheist*.
4. I have *watched the inaugurations of 1989, 1993, and 2001, 2005 on television at my home*.
5. I watched the 2009 inauguration of Barack Obama live from home and later on the internet.
6. As I watched this inauguration, I was shocked to hear Justice Roberts cite "so help me God" in the oath of office. This should be illegal and against the founding principals of this country.
7. Being 44 years old, I expect to witness *10* future inaugurations during my lifetime.
8. My son will be 16 years old for the next inauguration and I should not be put into the position to explain why "so help me God" is in the oath of office of the first secular democracy of this world the United States of America. I strongly believe religious indoctrination of children with little or no knowledge of history, philosophy and science to be a severe form of child abuse.

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

Executed on February 21, 2009.

I, Dallas Wingate Lipp, declare as follows:

I am a citizen of the United States and a resident of the State of Maryland.

I am a member of American Atheists, Secular Coalition for America, the Center for Inquiry, and the Beltway Atheists.

I consider myself an atheist and a humanist.

I have watched the inaugurations in 1989, 1993, 1997, 2001, and 2005 on the television in my home.

I watched the 2009 inauguration of Barack Obama from the West front of the United States Capitol in the Purple Section standing area where I was able to view the proceedings on a large television screen and hear the audio on speakers located in front of me.

As I watched this inauguration, I was disturbed to hear Justice Roberts amend the oath of office that he administered to President Obama by unilaterally appending the words "so help me god" to the oath. As these words are not included in the Article II, Section I of the United States Constitution I found it disturbing that Justice Roberts would include them as they are sectarian and exclusionary in nature and contrary to the inclusive secular nature of our system of government.

Being 46 years old, I expect to witness at least seven future inaugurations during my lifetime.

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

Executed on February 22, 2009.



Dallas Wingate Lipp  
505 Midsummer Drive  
Gaithersburg, Maryland 20878

# **James E. Lobdell**

**940B Temple Avenue  
Santa Rosa CA 95404**

February 17, 2009

I, James E. Lobdell, declare as follows:

I am a citizen of the United States and a resident of the State of California.

I consider myself an atheist.

I have watched most of the presidential inaugurations on television since that of President Eisenhower in 1953. I also watched the 2009 inauguration of Barack Obama live on television in my home.

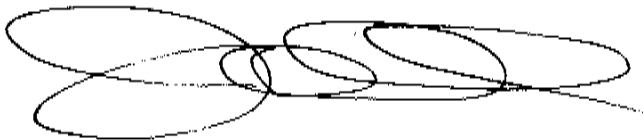
As I watched this inauguration, I was saddened that religion was once again allowed to intrude into the ceremony, in violation of the Establishment Clause of the United States Constitution, in the form of the invocation, the benediction, and the addition of words to the Constitutionally-prescribed Oath of Office.

I was offended by these injections of religion into the proceedings and object strenuously to the possibility of their inclusion in future inaugural ceremonies.

Being 69 years old, I expect to witness four or five more inaugurations during my lifetime, and I hope never to be similarly offended again.

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

Executed on February 17, 2009.

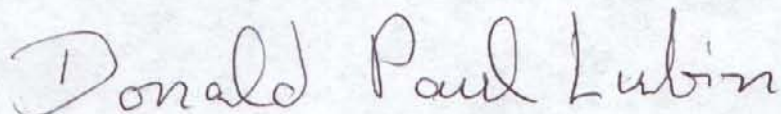
A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the end, positioned below the text of the declaration.

I, Donald Paul Lubin, declare as follows:

1. I am a citizen of the United States and a resident of the State of Massachusetts.
2. I am a member of American Atheists.
3. I consider myself an atheist, as did my parents and my brother.
4. I have watched the inaugurations in 1997, 1993, and other earlier years live on television.
5. I watched the 2009 inauguration of Barack Obama live on television.
6. As I watched this inauguration, I was angry about the injection of religion into the proceedings. I found the religious messages boring and quite irrelevant. Worse was the inclusion of "so help me God" into the oath of office itself. There is no Constitutional requirement for this phrase, and it has no place in what should be a secular ceremony. If a group wants to invite the President-elect to a religious event of some sort, and he or she chooses to attend, they should be permitted to make whatever religious statements they like. But they have no proper place in the official procedures of the United States of America.
7. Being 65 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 cursive script that reads "Donald Paul Lubin". The ink is dark and the handwriting is fluid and legible.

Donald Paul Lubin  
8 Ashford Street  
Allston MA 02134