# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MICHAEL NEWDOW, et al.,

Plaintiffs,

v.

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

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

Defendants.

## PLAINTIFFS' FIRST AMENDED COMPLAINT, APPENDIX G REDACTED DECLARATIONS OF NEW INDIVIDUAL PLAINTIFFS #5 OF 8 (M-Q)

MICHAEL NEWDOW In pro per and pro hac vice PO BOX 233345 SACRAMENTO, CA 95823

(916) 427-6669 NewdowLaw@gmail.com

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

(202) 238-9088 BRitter@americanhumanist.org I, Anthony Mack, declare as follows:

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

I am a member of the Skeptics Society, FACTS Church and the Bright movement.

I consider myself a "Bright" (www.the-brights.net) or "Atheist".

1 watched the 2001, 1993 and a few other inaugurations on television.

I watched the whole 2009 inauguration on television at my home, and re-watched Obama's speech on the Internet two more times. I also watched the flubbed oath of office about 5 times on the Internet.

As I watched this inauguration, I felt excluded and even angry every time religion was invoked. When the clergyman gave the prayer, it gave me great pains to see how much one particular religion has muscled its way into my government, and how the government is being using to promote Christianity over all other religions. As I listened to one religious reference after another, it became very clear to me that I did not belong, and that I am different because of my non-religious beliefs.

Furthermore, it seemed to me that every time a speaker wanted to add emphasis or importance to his or her statement, religion was used. An example of this was the addition of, "So help me god" to the end of the presidential oath of office. This sends the message to millions of people that the United States government thinks the most important thing of all is a bible-based god.

Being 44 years old, I expect to witness 5 to 10 future inaugurations during my lifetime.

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

Executed on February 17, 2009.

With the

Anthony Mack

14354 Ladd Canyon Road Silverado, CA 92676-0604 I, Jillian Mack, declare as follows:

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

I am a student at Saddleback collage. I am not a member of any organizations.

I consider myself an atheist.

The 2009 inauguration is the first inauguration I have watched. I watched a recording on television that my grandfather made for me.

As I watched I notices many references to god. It seems to me the government should not promote any particular worldview over any other because it makes the rest of us feel wrong or at least outsiders.

Being 19 years old, I expect to witness 10 to 15 future inaugurations during my lifetime.

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

Executed on February 17, 2009.

Anthan Made

Jillian Mack

14354 Ladd Canyon Road Silverado, CA 92676-0604 I, Susan Mack, declare as follows:

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

I am an unemployed computer programmer. I am a member of FACTS church.

I consider myself an atheist.

The 2009 inauguration is the first inauguration I have watched all the way through. I watched live on the internet.

The many references to God made me feel that my government gives preference to those who do believe in God, and that I am an outsider whose beliefs are to be spurned. While our government should be neutral on the subject of religion, this inauguration was not. In addition to the many references to God, the prayer specifically supported Christianity by its mention of Jesus. In doing so, the ceremony not only excluded me, but also those of all the non-Christian religions. This is a perfect illustration of why government needs to be completely silent on the topic of religion.

Being 54 years old. I expect to witness a maximum of 7 future inaugurations during my lifetime.

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

Executed on February 17, 2009.

Susan Macle

Susan Mack

14354 Ladd Canyon Road Silverado, CA 92676-0604 I, Andrew J. Mansker 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 many inaugurations on television, from my home, including 2009, 2005, 2001 and going back to 1977.

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

As I watched this inauguration, I was insulted to hear Justice Roberts end the oath with "so help me God." Incorporating theist statements in our secular government is not only an insult to myself and other non-theists, but denigrates the hard work and intent of our founding fathers. The founding fathers went out of their way to keep our government secular, but in recent years the Christian majority has managed to take away the "justice for all" that was so intended. To make matters worse, a divisive evangelical Christian minister gave the invocation. Insulting, but not surprising. As far as I know, it has always been a Christian giving the invocation! What about the other 2,000 religions in our country?

Being 50 years old, I expect to witness ten future inaugurations during my lifetime.

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

Executed on February 18, 2009

Andrew J. Mansker III

1580 S. Juniper, #30

Escondido, CA 92025

I, Peter Marchetti, declare as follows:

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

I am a member of The Freedom From Religion Foundation.

I consider myself an atheist.

I have watched the inaugurations of Ronald Regan, George H. W. Bush, Bill Clinton, and George W. Bush from my home or school in years past.

I watched the 2009 inauguration of Barack Obama on the National Mall in Washington D.C.

As I watched this inauguration, I was dismayed by the pandering, mis-representative, and unconstitutional prayer delivered by Pastor Rick Warren, and I was truly disheartened by the unconstitutional addition to the oath of office of the words, "So help you God" by Chief Justice John Roberts. These things made me feel excluded as a citizen, and angered me as a Constitutional Patriot. I was terrified as well, because if the words of the Constitution are not adhered to in a simple ceremony, when else might it be decided that the protection of my rights, as guaranteed in the Constitution, are not important to the powers that be, simply because the majority are not screaming in protest?

Being 34 years old, I expect to witness 12 or more future inaugurations during my lifetime.

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

Executed on February 18th, 2009.

Peter Marchetti

6610 East Wakefield Drive

Unit B2

Alexandria, VA 22307

- I, Victor O. Marquis, 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 and I am the President of the Atheist Humanist Society of Connecticut and Rhode Island.
- 3. I consider myself an atheist and a supporter of the Constitution of the United States of America.
- 4. I have, to the best of my recollection, watched every inauguration on television since my discharge from the U.S. Navy in 1965.
- 5. I watched the 2009 inauguration of Barack Obama live on TV.
- 6. As I watched this inauguration, I was not pleased to see the insertion of so many religious effects; i.e., the utterance of "so help me God" in the oath and the presence of clergy in what should be a purely secular, political event.
- 7. Being sixty-seven years old, I expect to witness one or two future inaugurations, during my lifetime.

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

Executed on February 22, 2009.

Victor O.Marquis 15 Wilson Lane

Danielson, CT 06239

- I, Eleanor Marquisee, declare as follows:
- 1. I am a citizen of the United States of America and a resident of the State of Delaware
- 2. I consider myself non-religious
- 3. I am a member of Delaware Association for Humanism
- 4. I have witnessed about 5 inaugurations on television
- 5. I watched President Obama's 2009 inauguration on TV. I was offended, and my family and I felt excluded by a ceremony that included prayer, participation by clergy and an oath of office which included reference to God. This is particularly ironic in light of the President's stated value of inclusion. We believe in separation of church and state, ie that deist language has no place in documents or ceremonies of a secular state.
- Because I'm 64 years old, I would estimate and hope that I'm fortunate enough to
  witness three or four more inaugurations in my life, and I hope that they will more
  accurately reflect the values of the US Constitution than this one did.

I declare under penalty of perjury that the above statements are true and correct.

Executed on February 21, 2009

Signed: Eleanor Marquisee

Eleanor Marquiece 1302 N. West Street

Wilmington, DE 19801

- I, Mark Marquisee, declare as follows:
- 1. I am a citizen of the United States of America and a resident of the State of Delaware
- 2. I consider myself an atheist
- 3. I am a member of Delaware Association for Humanism
- 4. I have witnessed about a half dozen inaugurations on television
- 5. I watched President Obama's 2009 inauguration on TV. I was offended and my family and I felt excluded by a ceremony that included prayer, participation by clergy and an oath of office which included reference to God. This is particularly ironic in light of the President's stated value of inclusion. We believe in separation of church and state, ie that deist language has no place in documents or ceremonies of a secular state.
- Because I'm 70 years old, I would estimate and hope that I'm fortunate enough to
  witness three or four more inaugurations in my life, and I hope that they will more
  accurately reflect the values of the US Constitution.

I declare under penalty of perjury that the above statements are true and correct.

Executed on February 21, 2009

Signed: Mark J. Marquisee

Mark J. Marquisee PhD 1302 N. West Street

Wilmington, DE 19801

## PLAINTIFF DECLARATION FOR NEWDOW V. ROBERTS

I, Richard McKelvy Martin, declare as follows:

I am a citizen of the United States and a resident of the State of California. I am a member of the Humanist Society of Santa Barbara and the Secular Coalition of Washington DC. I consider myself a "Humanist". I have a naturalistic world view, free of supernatural elements. I strongly advocate the elimination of all religious beliefs and assumptions from official events of the United States Government.

I watched the inaugurations of 1989, 1993, 1997, 2001, and 2005, 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 was disturbed and offended to see that Pastor Rick Warren began the ceremony with a Christian sermon, ending with the Lord's Prayer and "in the name of Jesus Christ". This was clearly advocating the Christian religion in a ceremony to uphold the Constitution of the United States. I find that personally very offensive, as it is completely contrary to my beliefs. It is also a clear violation of the First Amendment of the Constitution. Religion should have no place in the inauguration ceremony of the Vice President and President of our secular republic. The same principal applies to the phrase "so help me God" spoken in the ceremony by Chief Justice John Roberts of the Supreme Court. This assumption of a God who helps the President in his duties is offensive to me personally, is contrary to my beliefs, is completely unsubstantiated, and is in violation of the First Amendment.

I am 73 years old, and I hope to witness at least six more future inaugurations during my lifetime. I therefore have a strong interest in the removal of all religious content from all future inauguration ceremonies.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 17, 2009.

Richard M. Martin

1400 Mission Canyon Road

Santa Barbara CA 93105-2128

richardmartin@cox.net

Richard M. Martin

I, David Mauriello, declare as follows:

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

I am a member of the Freedom From Religion Foundation and the ACLU.

I consider myself an atheist.

I have watched every Presidential inauguration live on tv from Carter's in 1976 when I was just a child up to and including the recent inauguration of President Obama. As I watched this recent inauguration, I was particularly upset by Justice Roberts including "so help me god" as part of the oath. I think ANY deviation from the official oath is egregious enough, but including a swearing to a god deeply offends me on many levels. First, it's ridiculous. Second, it's a subordination of our nation's leader to a superstitious belief. Third, having Roberts say it for Obama to repeat gives the very clear message that this is expected and endorsed by the government, which has countless ramifications for me as an American atheist for it fosters an environment in this country where atheists are either 2nd class citizens or not "real" Americans. The third point is reinforced by the repeated prayers presented at various times during the inauguration.

Being 38 years old, I expect to witness at least 15 future inaugurations during my lifetime.

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

Executed on February 14th, 2009

David Mauriello 21 Rockland Court Wilmington, DE 19810

#### I, Sarah A. Maxwell, declare as follows:

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

I am a member of Freedom From Religion Foundation.

1

I consider myself a humanist, who believes in the innate goodness of human nature.

I watched the 1997 and 1993 inaugurations 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 was thrilled and awestruck to see Barack Obama be sworn in as president, but felt excluded from my government's inaugural process by the unconstitutional imposition of one religion's words presented as a part of the governmental process of swearing in a new president. I felt disappointed and embarrassed by my government's unconstitutional acts of presenting one religion's prayers, which excluded all other well-meaning Americans of other faiths, and by the words "So help me, god" by the Chief Justice of the Supreme Court who was supposed to say the words of the constitutional oath of office rather than his interpretation of the oath.

Being fifty-five years old, I expect to witness seven future inaugurations during my lifetime.

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

Executed on February 14, 2009.

Jarah a. Magwell

Sarah A. Maxwell



## James t. m<sup>C</sup>Collam

Magnolia, Arkansas 71754-9282 870-696-3327

E-Mail - jtmccollum@saumag.edu



### 16 February 2009

I, James T. M<sup>C</sup>Collum, declare as follows:

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

I am a member of the Freedom From Religion Foundation, American Humanist Association, and the Arkansas Association of Freethinkers.

I consider myself a Humanist and a Unitarian Universalist.

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

As I watched this inauguration, I was appalled at the outrageous pandering to religion and, in particular, the Christian religion, to the exclusion of other faiths and lack of same and contra to the pluralism upon which the nation was founded.

Being 74 years old, I expect to witness at least four more future inaugurations during my lifetime.

I have two minor grandchildren who saw the inauguration and, along with three other minor grandchildren who I expect will view the next inauguration. I firmly believe that all this official emphasis on Christian religious practices or any specific religious observances in connection with an official governmental activity such as the inauguration of a president sends the wrong message to them and to all young people in this country about the relationship of religion to our constitutional secular government,

Accordingly, I consent to having my name attached, as a co-plaintiff, to the inauguration lawsuit, brought by Michael Newdow, in Newdow vs Roberts.

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

Executed on 16 February 2009.

James T. M<sup>C</sup>Collum

1964 (Bolentablia 2E Emerson, Arkansas 71740

Newdow v. Roberts First Amended Complaint Appendix G Part/2:

Submitted Via Internet Personal Declaration - Newdow v. Roberts

I. Andrea H. McCormick, declare as follows:

I am a citizen of the United States and a resident of the Commonwealth of Pennsylvania.

I am a member of Freedom From Religion Foundation and I donate to the Military Religious Freedom Foundation. I also am a writer of letters to the editor of my local newspaper, the Harrisburg Patriot-News and to my government representatives.

I consider myself an atheist.

I have watched many inaugurations, the most recent one via the internet at work with the approval of my organization's president and CEO.

As I watched this inauguration, I was disgusted that a judge would be arrogant enough to insert words that favor one religion over others in the oath for the office of President of the United States of America. Words that do not appear in our Constitution. I was disgusted that this inauguration was prefaced by the words of a minister of one sect of one religion, who has preached and continues to preach that all Americans are not equal. What if a judge decided to add that "the United States will be protected from all horrible things if we sacrifice three goats and a virgin to the great spirit of the volcano, and this will help our President in his task"? Everyone would find this ridiculous but it is no more ridiculous than saving "so help you God".

Being 42 years old, I expect to witness thirteen future inaugurations during my lifetime; I come from a long-lived family. However, I have two nephews and one niece that will see many more inaugurations than I will. When one deity from one religion is invoked to somehow "protect" and "help" the President and the United States, that sends a message that only that deity exists. In that no one deity can be demonstrated to be any more real than any other deity, this is presenting them with a lie. The authors of the Constitution did not find it necessary to add this religious invocation. They knew the dangers of a state claiming that only one religion was "true". In a United States where all have the freedom to worship as they will, this invocation demonstrates a willful denial of this freedom.

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

Executed on February 16, 2009.

Indrea H. McCormick 3007 N Fourth Street Harrisburg, PA 17110

- 1, declare as follows:
- 1. I am a citizen of the United States and a resident of the State of Minnesota.
- 2. I consider myself a humanist.
- 3. I watched the 2009 inauguration of Barack Obama on television at my home.
- 4. As I watched this inauguration, I felt deep dismay at the violation of the Constitution by Mr. Roberts, as he added "so help you god" on his own, at the end of the Oath. I felt that this implies that as a humanist, I was not welcome to participate in the important and secular ceremony, even though I am a Citizen of this country.
- 5. Being 45 years old, I expect to witness about 8 future inaugurations during my lifetime.
- 6. My 15 year old son and 17 year old daughter, both of whom consider themselves atheists, were very interested in this election, and hope to view future inaugurations. My 15 year did view this year's inauguration. His voiced reaction to Mr. Robert's violation is the same as mine. My children should not have to feel marginalized because of their atheism.

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

Executed on February 19, 2009.

- I, declare as follows:
- 1. I am a citizen of the United States and a resident of the State of Minnesota.
- 2. I am a member of *Freedom From Religion Foundation*, **American Atheists and Minnesota Atheists**.
- 3. I consider myself an atheist.
- 4. I watched the 2009 inauguration of Barack Obama on television at my home.
- 5. As I watched this inauguration, I felt deep dismay at the violation of the Constitution by Mr. Roberts, as he added "so help you god" on his own, at the end of the Oath. I felt that this implies that as an Atheist, I was not welcome to participate in the important and secular ceremony, even though I am a Citizen of this country.
- 6. Being 45 years old, I expect to witness about 8 future inaugurations during my lifetime.
- 7. My 15 year old son and 17 year old daughter, both of whom consider themselves atheists, were very interested in this election, and hope to view future inaugurations. My 15 year did view this year's inauguration. His voiced reaction to Mr. Robert's violation is the same as mine. My children should not have to feel marginalized because of their atheism.

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

Executed on February 19, 2009.

Wednesday, February 18, 2009

I, Harriet Mitteldorf, declare as follows:

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

I am a member and significant supporter of Freedom From Religion Foundation, American Humanist Association, and Secular Coalition for America.

I consider myself agnostic.

I watched the 2009 inauguration of Barack Obama on television at my home. As I watched this inauguration with its invocation, Chief Justice Roberts then the President pronouncing the oath, and finally a closing prayer, I felt a denial of my place as a non-believer in this country.

Being 86 years old, I do not expect to witness many, if any, future inaugurations during my lifetime so I was particularly saddened for this event from which I felt so alienated to be my lasting memory.

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

Executed on February 18, 2009.

Cuittelas

Harriet Mitteldorf

942 Coral Dr.

Pebble Beach, CA 93953

### Javier Monllor

1815 W. Touhy Ave., Apt. 1 Chicago, IL 60626

February 18, 2009

I, Javier Monllor, declare as follows:

I am a citizen of the United States and a resident of the State of Illinois. I am a member of Rationalist and Freethinkers (RAFT) and Puerto Ricans for Freethought and Reason and consider myself a humanist and and an atheist.

I watched the inaugurations of George W. Bush in 2005 and Barack Obama in 2009 live on television at my home and again on the internet and the news during the next couple of days. As I watched this inauguration, I felt a deep sense of uneasiness and alienation as I was forced to watch various preachers pray to God and in some instances, to a specific God, such as Jesus Christ. I was also disconcerted at hearing Chief Justice John Roberts include the word "So Help Me God" in the presidential oath, as it is my belief that there is no such thing and these words were not part of the original oath and were introduced much later.

Being 32 years old, I hope and expect to witness around 12 or more future inaugurations during my lifetime with the hope that they will be more inclusive.

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

Executed on February 18, 2009.

Sincerely yours,

Javier Monllor

I, Phillip Monroe, declare as follows:

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

I am a member of Freedom From Religion Foundation.

I consider myself an atheist.

I have watched the inaugurations of 1977, 1981, and 1989 on television at work.

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

As I watched this inauguration, I felt pride that history was being made, and sad that it had taken so long to elect a person of color. I felt included when non-believers was mentioned in the address, but excluded when the clergy were preaching through their prayers. I felt chagrined when Chief Justice Roberts flubbed the oath and President Obama tried to lead him into the correct order of words.

Being 55 years old, I expect to witness five future inaugurations during my lifetime.

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

Executed on February 13, 2009.

Chillip Monroe

- I , declare as follows:
- 1. I am a citizen of the United States and a resident of the State of Texas.
- 2. I consider myself an atheist.
- 3. I have watched the inaugurations of 1985, 1989, 1993, 1997, 2001, 2005 and 2009 live on television.
- 4. As I watched this latest inauguration, I became hopeful when President Obama included our family by mentioning non-believers but I was quickly dissappointed when nearly every part of the inauguration involved prayers, blessings, sermons and having Barack Obama and Joe Biden having to swear in with so help me God! Every four years I try to forget this part. It is always such a let down and insult to me to again and again have religion, and mostly the Christian religion take such a primary role in the daily and special events of our government. It is difficult to explain to our daughter the seperation of church and state when it is not much of a reality.
- 5. Being 48 years old, I expect to witness possibly 10 future inaugurations during my lifetime.
- 6. Our 7-year-old daughter watched the inauguration at school where we had no input or control over what she was watching. The submissions and loyalties to Jesus and God leaves her with a belief that God lives and works in the White House and that just like with President Bush, now President Obama must answer to and obey "him."

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

Executed on February 20th, 2009.

- I, Thomas Morgan, declare as follows:
- 1. I am a citizen of the United States and a resident of the State of California.
- 2. I consider myself an aetheist.
- 3. I watched the 2009 inauguration of Barack Obama on television.
- 4. I believe that having the president swear on a bible and recite the term "so help me god" is inappropriate and damaging to the government and the country.

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

Executed on February 23, 2009.

Thomas J. Morgan

Silverado, CA

I, Garrett Morris, declare as follows:

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

I am a member of Freedom From Religion Foundation.

I consider myself an atheist.

I have watched all of the inaugurations that I have been alive for 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 aghast at the many references to "Jesus" and "God" during the ceremonies. It made me, as an atheist, feel as though neither I, nor my beliefs mattered to my Government.

Being 40 years old, I expect to witness 10 future inaugurations during my lifetime.

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

Executed on February 13, 2009.

Jairet llow

Garrett Morris

1002 Derry Lane

Macomb, Illinois 61455

Anthony Muñoz 5225Canyon Crest Dr. #71-445 Riverside, CA 92507 (951)232-5365

I, Anthony Muñoz 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, 2001, and 2005 on television or Internet at my home.

I watched the 2009 inauguration of Barack Obama on the Internet. As I watched this inauguration, I felt excited for this new president since he has been so inspiring for a positive future, but also disturbed with the mention of a god as he was sworn in. I was under the impression that this president would be somewhat different than the last in regards to faith based propaganda.

Being 36 years old, I expect to witness at least 8 future inaugurations during my lifetime.

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

Executed on February 13, 2009.

(Anthony Muñoz)

I, Michael J. Murphy, declare as follows:

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

I am a member of the Freedom From Religion Foundation.

I am an atheist.

I have watched the inaugurations of 1993 and 2005 on television in my home. I also watched the 2009 inauguration of Barack Obama live on television.

As I watched this inauguration, I felt personally insulted and alienated by the religious overtones injected by the clergy invited to this event. The clear message was that only those citizens believing in a Christian god were included in the ceremony. Instead of an appropriate secular ceremony, all Americans were subjected to the divisive nature and tone of a religious message.

I served my country faithfully and honorably as a Navy medic in Viet Nam. I am a responsible, law-abiding citizen and consider myself a patriot. To be made to feel excluded from this historic event because of my personal theological views is repugnant to me and represents a slap in the face to thousands of non-religious Americans.

Being 60 years old, I hope to witness four or more future inaugurations during my lifetime. I can only hope that the original, secular nature of this event can be restored to future inaugurations and that religious proselytizing can be relegated to the churches and synagogues where it belongs.

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

Executed on February 18, 2009.

Michael J. Murphy 8926 Iffert Ave. NE

Monticello, MN 55362

I, Viktor Nagornyy, declare as follows:

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

I am a member of American Atheists, Military Association of Atheists and Freethinkers, Richard Dawkins Foundation for Reason and Science, and Atheist Alliance International. Also, I am volunteer convention director for Atheist Alliance International.

Currently, I am serving in the U.S. Navy.

I consider myself an atheist.

I was born in Ukraine, and received my citizenship in 2006. This was my first elections where I was able to exercise my right to vote. I have seen inauguration in 2004, my first one.

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

It was hard to watch values upon which this country was built thrown out the window during the ceremony. Yet again, I watched 2009 inauguration with pain in my heart. The values that I swore to protect were ignored; the Constitution that I swore to defend was ignored. How can one ignore the laws he is swearing to protect while taking the oath?

Being 21 years old, I expect to witness 10 future inaugurations during my lifetime.

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

Executed on February 18, 2009.

Wholey Magornyy AM3, USNR Viktor Nagornyy, AM3, USNR

1406 Dory Dr #2119

Virginia Beach, VA 23453

- I, Connie B. Nelson declare as follows:
- 1. I am a citizen of the United States and a resident of the State of California.
- 2. I consider myself a non religious person of good character.
- 3. I have watched the inaugurations since childhood! I watched Kennedy's, Johnson's, Nixon's, Fords, Carters, Regan's GHW Bush, Clinton's and bush II and OBAMA!
- 4. I watched the 2009 inauguration of Barack at home on my TV.
- 5. As I watched this inauguration, I reflected on how important the separation of church and state was to our founders. I am appalled that the people sworn to defend the constitution take this so lightly, that very implicit, important separation of church and state. We are a government of laws, not religion (or, as other religions call each other, Mythology!)
- 6. Being over 50 years old, I expect to witness at least eight more future inaugurations during my lifetime.
- 7. So, should we have all religions represented? Should Chief Justice Roberts have to utter Pagan, Muslim or even Wicken ritual? How about Judaism? I am not bound by these religions anymore than they are bound by Christianity or the current form of it. I was furious that with theocracies such as Iran providing such good examples of what religion does when combined with government the inclusion of religion is the start of our famous transfer of power by democracy. The establishment clause is pretty plain English for anyone willing to examine it. We are not a country under "god". We are a country of laws. All citizens are bound to those laws. If anything, the oath should be taken ON the CONSITUTION!

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

vin B Telson

Executed on February 23, 2009.

Connie B. Nelson

Connie B. Nelson P.O. Box 27 29641 Silverado Canyon Rd. Silverado, Ca. 92676

#### I, Steven Neubauer, declare as follows:

I am a citizen of the United States and a resident of the State of Pennsylvania. I am the president of Pennsylvania Nonbelievers and a member of the Freedom From Religion Foundation and been a nonbeliever in the supernatural all of my life.

Having watched every presidential inauguration since 1981 on television, including the inauguration of Barak Obama this year, I have always felt that the inclusion of "so help you God" at the end of the presidential oath of office was intended as a de facto religious test, a public declaration of belief, that was intended to exclude nonbelievers such as myself and millions of others from holding public office in America.

In the inauguration of 2009, Chief Justice John Roberts even asked Mr. Obama the question, at the conclusion of the constitutionally mandated oath of office, if Mr. Obama would swear to the oath he had just given "so help you God?" Tests consist of asking questions, and this question was clearly intended to be a public test of Mr. Obama's religious beliefs.

As an American of 59 years of age I expect to watch several more presidential inaugurations during my lifetime. My hope is that during the next presidential inauguration in 2013, there will be no inappropriate public prayers that alienate nonbelievers and the Chief Justice will administer the oath of office as it is given in our Constitution and not add a reference to God that will imply that atheists, agnostics and other nonbelievers such as myself are to be excluded from the political process.

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

Executed on February 17, 2009,

Steven Merlianer

Steven Neubauer 45 Gravel Hill Road

Mount Wolf, PA 17347

I, Jeanette M. Norman, declare as follows:

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

I am a member of Humanists of Colorado, the Freedom From Religion Foundation, and Denver Atheists and Freethinkers, of which I am an organizer.

I consider myself to be an atheist.

I saw the 2001 and 2005 inauguration ceremonics on t.v., as well.

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

As I watched this inauguration, I was shocked to see that the entire ceremony was one long church service.

Being 43 years old, I expect to witness a half dozen future inaugurations during my lifetime.

to Ha, Noman

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

Executed on February 18, 2009

Jeanette M. Norman 2190 S. Downing St. Denver, CO 80210 I, Barbara Ann Nydick, declare as follows:

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

I am a member of the Freedom From Religion Foundation and American Atheists, Boston chapter.

Although born of a liberal Jewish family, once I could think for myself, I considered myself an atheist and continue to regard myself an atheist.

Since the first televised inauguration in Washington, DC, I have watched all of them.

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

As I watched this inauguration, I tried to prepare myself emotionally for the inevitable series of prayers/religious speeches and the swearing on a bible and oath stating "under god". No matter how many times I have had to endure this favoritism of religion, especially repeated favoritism of the Christian faith, it still hurts to be excluded. This most important moment in our (my) history continually is flawed by casting me and my peaceful philosophy out of the group of Americans addressed in the recitation of speeches and oaths.

Being 69 years old, I expect to witness two to three future inaugurations during my lifetime. How I hope I will live long enough to witness the inclusion of all Americans in this proud and memorable event! I hope we, as a country, will have evolved to a place where all, regardless of religion, or absence of it, will be included.

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

Executed on February 14, 2009.

Borbara A Vydrek

Barbara A. Nydick 39 Garth Road

West Roxbury, MA 02132

Dale Oliver 12832 Peach Tree Way Euless TX 76040

I, Dale Oliver, declare as follows:

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

I am a member of Freedom From Religion Foundation and I consider myself a humanistic- atheist.

I have watched the inaugurations of 1953, 57, 61, 65, 69, 73, 77, 81, 85, 89, 93, 97, 2001, 05 and 09 on television at my home.

As I watched these inaugurations, I it always struck me at the words "So help me God" that I must be different, that I was somehow excluded by my lack of belief in a God.

Being 68 years old, I expect to witness 3 or more future inaugurations during my lifetime. I have had the experience that one's swearing on the bible and/or invoking the name of God has little to do with the truth of what is being sworn to or how one fulfills those promises. I would rather the phrase not be used in official proceedings at all.

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

Executed on February 13th, 2009.

Kener

Dale Oliver

#### David Patrick Pabian • 2214 India Street • Los Angeles, CA 90039-3313 • 323-662-6551

I. David Patrick Pabian, declare as follows:

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

1

I am a member of Atheists United and Gay and Lesbian Atheists and Humanists. I consider myself an atheist-humanist.

I have watched on television every Presidential Inauguration since 1977, and took special interest in the inaugurations of 1993 and 2001, as I considered them especially momentous, each for vastly different reasons, reflecting the two vastly different presidents involved.

As with all previously telecast inaugurations, I watched the 2009 inauguration of Barack Obama live on television and saw re-broadcasts of the more memorable moments (Rick Warren's invocation and President Obama's swearing-in) throughout the day and on the internet.

As I watched this inauguration, I was appalled by Warren's recitation of "The Lord's Prayer," the specifically Christian reworking of older, specifically Jewish texts, and his triumphantly smug manner in doing so. I was even more appalled when Justice Roberts administered the Oath of Office to the new President, being at first embarrassed by Robert's not having learned his lines, and then being outraged by his insertion of the words "so help you god?" at the end, displaying a dismaying ignorance of the Constitution and the oath's wording, i.e., "I do solemnly swear (or affirm) that I will faithfully execute the office of President of the United States, and will to the best of my ability, preserve, protect and defend the Constitution of the United States."

Robert's irresponsible disregard and/or ignorance of the founding principles of the United States and Rick Warren's tasteless invocation of the supposed words of a rabbi later mythologized into the founder of a new religion reeks of the arrogant infantilizing of, and total contempt for, the citizens of the United States.

This presumptuous display (Robert's and Warren's) of flouting this nation's principles to make self-interested religio/political points with a narrow constituency implies, and even teaches, all Americans, most damagingly children, dishonest and dangerous revisionist history that can only further erode the democratic principles this country was founded on, principles the court Justice in question has sworn to uphold.

Being 59-years-old, I hope to witness at least five future inaugurations during my lifetime, and hope that with the next, in 2012, such egregious contempt for the American public and Republic will be a thing of a dim, unenlightened past.

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

and Patrick tahu

Executed on the 19th of February, 2009.

David Patrick Pabian 2214 India Street

Los Angeles, CA 90039-3313

#### I, Jennifer Paige, declare as follows:

- 1. I am a citizen of the United States and a resident of the State of New York.
- 2. I am an atheist.
- 3. I watched the 2009 inauguration of Barack Obama live on television in my home.
- 4. As I watched this inauguration, I was proud to be an American, yet dismayed by the seemingly endless invocations of "God" in a ceremony celebrating a nation that claims to be built on the ideals of a separate church and state. As an atheist, hearing "God" invoked in this way is as offensive as if the president had yelled out the "F" word, the "N" word, or any other expletive. It was disturbing, grating, unnecessary and entirely inappropriate. The inclusion of the clergy in the celebration is inappropriate as well—and seems hypocritical. I actually had to leave the room when Rick Warren was speaking.
- 5. I expect to be able to witness many future inaugurations during my lifetime—but anticipate that I may avoid the experience, because, despite the fact that I am a very patriotic American, I find the "God-centric" language of the inauguration disingenuous and disturbing.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 20, 2009.

Jennifer Paige

325 N End Ave 12K

genniger Parge

NY, NY 10282

- I, Carolie Park, declare as follows:
- 1. I am a citizen of the United States and a resident of the State of Montana.
- 2. I am a member of the American Humanist Association and Atheists United.
- 3. I consider myself an atheist.
- 4. I have watched the inaugurations of 1989, 1993, 1997, 2001, 2005 and 2009 on television at my home.
- 5. I watched the 2009 inauguration of Barack Obama live on television at my home, and later on the Internet.
- 6. As I watched this inauguration, I was affronted by the phrase "so help me god" uttered by Justice Roberts and repeated by President Obama.
- 7. Being 57 years old, I expect to witness six to eight more inaugurations during my lifetime.

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

Executed on February 20, 2009.

Carolie Park

28932 Wapiti Lane

Bigfork, MT 59911

February 14, 2009

Marsha Petry 12130 S. Critchell Lane Littleton, CO 80127

To whom it may concern:

I, Marsha Petry, declare that:

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

I am a member of the Freedom From Religion Foundation and I consider myself an atheist.

I have watched parts of at least 4 inaugurations over the last 28 years, beginning with Ronald Reagan's inauguration to his first term in office in 1981. I later watched parts of the Clinton inauguration in 1993 and 1997. I could not make myself watch the GW Bush inauguration due to anticipation of prayer and deferences to the Christian religion. When Obama was elected president I was hopeful that I could once again watch the inauguration and anticipate a less theocratic government; but then I heard that there would be two (or more, I stopped listening after the first two) Christian officials giving invocations and prayers. Therefore, I did not watch the Barack Obama inauguration specifically because of the religious prayers.

After all these years I am disappointed and tired of the mixing of religion into a political system which was meant to be unbiased toward any religion. So while I'm not upset with Mr. Obama becoming president, nor do I have any wish to hinder religious preaching, I felt like I could not watch another prayerful inauguration where politics and religion (especially Christian) were so intertwined. Although I was enthusiastic towards politics in my late teens and early 20's, the past 28 years of inaugurations have left me pessimistic that we will ever have an unbiased, non-discriminatory United States government.

Being 46 years old, I expect to witness 10 future inaugurations during my lifetime.

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

Executed on February 14, 2009.

Hun By

- I, Lori Plazinski, declare as follows:
- 1. I am a citizen of the United States and a resident of the State of Maryland.
- 2. I am a member of Beltway Atheists (BA) & BA Charitable Works Committee, Center for Inquiry, Secular Coalition for America, American Atheists, and Washington Area Secular Humanists (WASH).
- 3. I consider myself an atheist, a humanist, freethinker, patriot & good person.
- 4. I have watched parts of the inaugurations of 1977, 1981, 1993, 1997, 2001 and 2005 on television at my home.
- 5. I attended the 2009 inauguration of Barack Obama and listened to it from the West front of the US Capitol in the purple section standing area and viewed some of it on a partially obstructed jumbotron. I also DVR recorded the ceremony and have viewed it at least two times. I have watched frequent internet and news snipets of the inauguration & the do-over swearing in on Wednesday.
- 6. As I watched and listened to this inauguration, I was disgusted at the choice of Rick Warren. to do the invocation. I listened to him with my back turned to him in protest, trying to be respectful to the occasion, but still wanting to show my disapproval. I was unable to suppress a "bullshit" cough when he spoke of tolerance. I felt extremely alienated listening to his religious rant and felt strongly that this strongly Christian-biased message was not appropriate for a civic ceremony. I felt bewildered when I heard Justice Roberts state the oath incorrectly. I was both offended and annoyed when he added "so help you god." I was disappointed that President Obama chose to repeat those words, as they are not in the Constitutional oath. As a constitutional professor, I had hoped that President Obama would not add any unnecessary words to the oath. I also listened to Joseph Lowery give the benediction. While I respect his civil rights accomplishments, and he was a less objectionable and more entertaining speaker than Warren, it did not change the fact that I was forced to listen to people express their religious views and prayers in a governmental ceremony. I appreciated President Obama's mention of non-believers in his speech, but felt it was mildly patronizing. I felt proud to know people who filed the initial lawsuit to try to stop this nonsense, and a new resolved that it was an important thing to do.

On Sunday, I attended the "We Are One" Inaugural Concert at the Lincoln Memorial. I could not hear Eugene Robinson's prayer. It was not included in the show that I DVR recorded. I don't think prayer should be endorsed by the government in public ceremonies. Regardless of the symbolism of the speaker, prayer is just not appropriate. I was also disappointed that President Obama chose to perpetuate these inane traditions, including the National Prayer Service.

7. Being 42 years old, I expect to witness 6-8 future inaugurations during my lifetime.

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

Executed on February 22, 2009.

Lori Plazinški 505 Midsummer Dr Gaithersburg, MD, 20878

301-948-0552

Newdow v. Roberts First Amended Complaint Appendix G Part 2: M-Z [Redacted]

I,Joel W. Price, declare as follows:

Lam a citizen of the United States and a resident of the State of Arkansas.

I am, like Thomas Jefferson, a "sect of one."

I consider myself a "metatheist", by which I intend to connote that I have used reason and rational thought to evolve BEYOND("meta-") any theisms or beliefs.

I have watched every inaugural from 1961 though 2009.

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

As I watched this inauguration I was appalled, dismayed and disappointed that both the incoming President and the Chief Justice( a purported "strict constructionist") of the Supreme Court desecrated the Constitution by inserting the use of a so-called "holy text" and adding "So help me god" to the Presidential Oath. The Presidential Oath is the ONLY phrase that appears in quotes in the constitution. It is pellucidly clear that the Framers intended this PRECISE oath to be taken; and it should not be adulterated by temporary denizens of positions of power whimsically inserting popular conventions. This is not a matter where a President or the Courts are asked to infer unarticulated rights, powers or duties from some other broad or ambiguous phrase of the Constitution. Art2 Secl{8} SPECIFICALLY says, "I do solemnly swear (or affirm) that I will faithfully execute the office of President of the United States, and will to the best of my ability, preserve, protect and defend the Constitution of the United States."

Plain and simple; only this and nothing more—no "bible", no "so help me god"!

Being 57 years old, I expect to witness 6 or more inaugurations.

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

Executed on Eebruary 17th, 2009.

Joel W.Price

Attorney-at-law 515 Garrison Av

Ft Smith, Ar 72901 I, Jeffrey R. Purdon, declare as follows:

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

I am a member of the organization PA Nonbelievers.

I consider myself an atheist.

I watched the 2009 inauguration of Barack Obama via streaming video on the Internet.

As I watched this inauguration, I witnessed Reverend Rick Warren lead the ceremony with a Christian prayer, making many specific references to Jesus Christ and the Trinity; additionally, I witnessed Chief Justice John Roberts issue the Oath to Mr. Obama appending the phrase "so help me God."

Being 27 years old, I expect to witness eleven or more future inaugurations during my lifetime.

Being an atheist I was especially outraged at what I witnessed. It is not Justice Robert's place to alter the Oath, especially by requiring Mr. Obama to take a religious pledge in order to take Office. I am also outraged that the inauguration ceremony was initiated in a way that made it appear to be a Christian church service rather than a civil proceeding. It is my understanding that matters of the State are not to be confused with Church services. It is also my understanding that no civil servant shall be required to pass a religious test in order to take Office.

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

Executed on the 18th of February, 2009.

Jeffrey R. Purdon

1320 West Chew Street 2F

Allentown, PA 18102