

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND – BALTIMORE DIVISION

ALBERT SNYDER,

Plaintiff,

vs.

Case No. 1:06-cv-1389-RDB

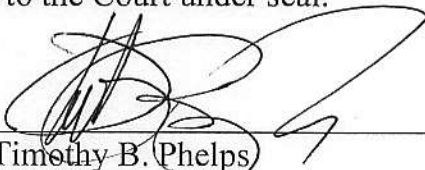
FRED W. PHELPS, SR.;  
SHIRLEY L. PHELPS-ROPER;  
REBEKAH A. PHELPS-DAVIS; and,  
WESTBORO BAPTIST CHURCH, INC.,  
Defendants.

**DECLARATION OF TIMOTHY B. PHELPS**

Timothy B. Phelps, on behalf of Westboro Baptist Church, Inc. (WBC), continuing under his sworn oath in this matter, both generally as to his testimony, and specifically as to the financial information submitted, hereby declares that the following items are attached, and that they are true and correct copies of the same. This financial information is submitted in addition to the financial statement previously submitted by this declarant for defendant WBC, dated 10/29/07, sworn to before the Court, and made Court's Exhibit 1 at trial herein. The attached items are supporting documents reflecting the assets and liabilities as directed by the Court.

1. There are no tax returns because WBC is a church.

2. The most recent Not For Profit Corporation Annual Report for WBC, which is a public record available through the Kansas Secretary of State's office, is attached. There are no shareholders in this non-profit corporation.
3. The most recent appraisal of the Shawnee County Appraiser for the church property at 3701 S.W. 12<sup>th</sup> St., Topeka, Shawnee County, Kansas, is attached (not under seal). Since the pastor and his wife, Fred W. Phelps and Margie M. Phelps, have resided at the property of WBC since the church was founded in 1955, with the full knowledge and permission of church members, your declarant states that it is his expectation that should any effort be made to collect on this property, a homestead exemption at least as to some of the property would be claimed by the pastor and his wife. See *Redmond v. Kester*, 284 Kan. 209, 159 P.3d 1004 (2007); Kan. Const. Art. 15, §9; K.S.A. 60-2301.
4. A current internet bank statement, with bank name and account number redacted, of WBC's bank account is submitted to the Court under seal.
5. The most recent notice/statement of the mortgage/note balance on the WBC property is submitted to the Court under seal.

  
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Timothy B. Phelps