

# EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

AMERICAN FREEDOM DEFENSE  
INITIATIVE; *et al.*,

Plaintiffs,

v.

SUBURBAN MOBILITY AUTHORITY  
for REGIONAL TRANSPORTATION  
("SMART"), *et al.*,

Defendants.

No. 2:10-cv-12134-DPH-MJH

**DECLARATION OF  
PAMELA GELLER**

Hon. Denise Page Hood

Magistrate Judge Hluchaniuk

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I, Pamela Geller, make this declaration pursuant to 28 U.S.C. § 1746 and based on my personal knowledge.

1. I am an adult citizen of the United States and a plaintiff in this case.

2. I, along with Robert Spencer, who is also a plaintiff in this case, co-founded the American Freedom Defense Initiative (“AFDI”). I am currently the Executive Director of AFDI, and Mr. Spencer is the Associate Director.

3. AFDI is a nonprofit organization that is incorporated under the laws of the State of New Hampshire. AFDI is also a plaintiff in this case.

4. Mr. Spencer and I engage in free speech activity through various projects of AFDI. One such project is the posting of advertisements on the advertising space of various government transportation agencies throughout the United States, including the Suburban Mobility Authority for Regional Transportation (“SMART”), which operates buses in the Detroit, Michigan area.

5. AFDI’s “*Leaving Islam*” advertisement, which has been identified as Exhibit 2 to the SMART deposition and Exhibit SS to my deposition, expresses a critically important public service message. The advertisement provides information to those who seek refuge from a potentially dangerous situation: leaving Islam. For young girls and women in particular who desire religious freedom and equality, leaving Islam can be life threatening. In short, this advertisement offers help for these women similar to the help that might be offered

by an advertisement for a battered women's shelter or other such program designed to help victims of domestic abuse and violence.

6. The "*Leaving Islam*" advertisement has run on transit authority buses in Miami, New York, and San Francisco.

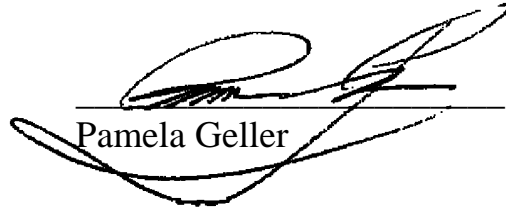
7. On or about May 12, 2010, we (Mr. Spencer, AFDI, and I) submitted the "*Leaving Islam*" advertisement to SMART. We subsequently entered into a contract through SMART's advertising agent, CBS Outdoor, to run the advertisement on SMART's buses.

8. On or about May 24, 2010, Mr. Robert Hawkins, the CBS Outdoor agent with whom I was working, informed me that SMART refused to run the advertisement. Mr. Hawkins suggested I contact Beth Gibbons of SMART, who was his primary contact there, and he provided me with Ms. Gibbons' email address. I immediately emailed Ms. Gibbons and asked her: "What was it about the ad that was 'not approved' and what would have to be changed? Please let me know so we can get this campaign on the road."

9. I heard nothing from Ms. Gibbons or from any other SMART representative. The only information that I received from SMART, as relayed to me through Mr. Hawkins, was that SMART rejected the advertisement.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed on the 14th day of August, 2013.



Pamela Geller