

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

**Covenant Weddings LLC and Kristi
Stokes,**

Plaintiffs,

v.

Cuyahoga County,

Defendant.

Case No. 1:20-cv-01622

**Declaration of Kristi Stokes in
Support of Plaintiffs' Preliminary
Injunction Motion**

I, Kristi Stokes, declare as follows:

1. I am over the age of eighteen and competent to testify, and I make this declaration based on my personal knowledge.
2. In August 2019, I launched my business as a sole proprietorship under the name "The Officiant."
3. To promote my business to the public and to receive requests for services from the public, I created social media accounts for this business on Facebook and Instagram.
4. I later decided to rebrand and rename my business by incorporating as a limited liability company under the name Covenant Weddings LLC.
5. I transitioned the Officiant's Facebook and Instagram accounts to become accounts for Covenant Weddings LLC.
6. In May 2020, I filed Covenant Weddings LLC's Articles of Organization.
7. A true and correct copy of Covenant Weddings LLC's Articles of Organization is in the Appendix at pages 1-4.

8. I organized Covenant Weddings as a limited liability company to gain the benefits of a limited liability corporate form.

9. I am the sole owner, member, and employee of Covenant Weddings LLC.

10. Covenant Weddings LLC is a for-profit limited liability company organized under Ohio law and has its principal place of business located within Cuyahoga County.

11. Also in May 2020, I adopted a Written Declaration for Covenant Weddings LLC to codify my business' core beliefs, practices, and policies.

12. A true and correct copy of Covenant Weddings LLC's Written Declaration is in the Appendix at pages 5–10.¹

13. As stated in the Written Declaration, I “operate[] this business in accordance with [my] religious beliefs as a means of pursuing [my] spiritual calling to share [my] faith, celebrate marriage, and glorify God.”

14. To further promote my business to the public, I also reserved a domain name for my business (www.covenantweddings.org).

15. I have designed content for my business website, but I have not yet made the website publicly available.

16. True and correct copies of Covenant Weddings' website are in the Appendix at pages 11–42.

I become a Christian and live out my faith.

17. I am an evangelical Christian.

18. I became a Christian when I was eight years old after witnessing the transformative effect Christianity had on my father.

¹ Unless context indicates otherwise, the remainder of this declaration refers to The Officiant and Covenant Weddings LLC as “Covenant Weddings.”

19. Before that time, my father had been an extreme alcoholic who lived a reckless and chaotic life.

20. My uncle invited my father to a men's Bible study, and my father grudgingly agreed to attend.

21. At that Bible study, my father became a Christian, which had a radical and immediate effect on his life.

22. When he came home, he poured out every bottle of liquor, beer, and wine in the house and has been sober ever since.

23. He then began taking me to church and introducing me to Christian ministries.

24. On the night I recall becoming a Christian, I remember praying to God something like "I know you are real because nothing, and no one else, has ever been able to get through to my dad and I will live my life in service to you."

25. I base my religious beliefs on the Bible and the religious teachings of pastors, theologians, church leaders, and other Christian religious leaders, speakers, and writers so long as these teachings are consistent with my interpretation of the Bible.

26. My religious beliefs influence all aspects of my life, including my identity, relationships, actions, and understanding of the world.

27. I believe that God created humans to work, that God is sovereign over our work, and that Christians are commanded to honor Him in their work. (Genesis 1:26–28, 2:15; Colossians 3:23–24; 1 Corinthians 10:31).²

28. Because of these beliefs, I cannot put my religious identity into separate personal and professional boxes, but I must honor God and serve Him in everything I do, work included. (1 Peter 4:10–11).

² All Bible citations reference the English Standard Version.

29. I believe that my highest aim in life is to love, serve, and honor God with everything that I do, think, and create. (Matthew 22:37–38).

30. I also believe that I should orient my life towards serving and helping others. (Matthew 22:39–40).

31. I also believe that part of loving God and serving and helping others involves proclaiming the truth about God’s design for humanity. (Matthew 28:16–20).

32. Based on my religious beliefs, these truths include that people have been separated from God and can only be reunited with Him through the forgiveness offered by His son Jesus, that God creates every person in His image to be male or female, and that God designed marriage to be between one biological man and one biological woman to reflect the special covenantal relationship Jesus shares with His Church. (Genesis 1:27; Genesis 2:18–24; Matthew 19:4–6; Ephesians 5:22–33).

33. As part of my religiously motivated desire to love God, serve others, and proclaim biblical truth, I have been involved with many Christian ministries since becoming a Christian.

34. For example, I started volunteering at a homeless shelter when I was eight years old. I prepared food, passed out clothing and toiletries, and prayed with homeless individuals. I continued to volunteer at the shelter until I was nineteen.

35. As a teenager, I also volunteered at a veteran’s hospital where we provided food, prayer, and music through Christian musicians to the veterans.

36. I also actively volunteered at the church I attended, including by leading childcare, participating in the choir, performing administrative tasks at the church office, leading Bible studies, and helping on local mission trips.

37. I was also involved in a drama ministry where I performed roles in Christian dramas in churches and in public as a way to teach others about Christianity.

38. From 2000 to 2001, when I was in my late teens and early twenties, I traveled to England, South Africa, and Zimbabwe on an approximately year-long foreign-missions trip.

39. I spent most of my mission trip in Bulawayo, Zimbabwe, where I lived with a local pastor and his family.

40. While there, I taught religion at a local Christian school and traveled to other communities to teach them about the Bible.

41. I also volunteered with the Red Cross and provided training on AIDS and other sexually transmitted diseases.

42. When I returned to the United States, I continued to volunteer at the church I attended and led a mission trip to Panama for several weeks where we built an addition for a local church and traveled to rural parts of the country to teach those communities about the Bible.

43. From 2004 until 2012, I began working at several other ministries that provided services to other churches, church conferences, and individuals in drug rehabilitation, veteran's hospitals, homeless shelters, and women's shelters.

44. In these positions, I had the opportunity to preach and provide services and prayers to the individuals served by the ministries.

45. Also from 2006 until 2012, I held several formal ministry positions at local churches, including working as an associate pastor, a youth pastor, and a member of a worship band.

46. In these positions, I regularly spoke in public, wrote about matters of faith, met with the sick, elderly, and other congregation members in need, and taught education classes for church members.

47. I also occasionally delivered sermons, planned church services, and coordinated religious events, including baptisms, baby dedications, and religious conferences.

48. I also assisted the lead pastor by meeting with premarital couples, coordinating wedding planning, and helping draft content for weddings, such as vows.

49. In 2012, I began attending seminary.

50. I received my bachelor's degree in Biblical Studies in 2016 and my master's degree in Pastoral Ministry in 2018.

51. In 2018, I began working towards my PhD to advance my education and to improve my ability to minister to others and teach them about the Bible.

Covenant Weddings LLC begins.

52. In 2018, a family member asked me to officiate her wedding in Florida.

53. I agreed to officiate the wedding because I was excited about the opportunity to take part in the beginning of a new marriage, to support a couple I loved, and to communicate my religious beliefs about God's plan for marriage.

54. In preparation for officiating the wedding, I wrote a custom homily and custom vows for the ceremony and a custom prayer for the reception dinner.

55. Prior to the wedding ceremony, I also became ordained as a minister in November 2018.

56. A true and correct copy of my credentials of ministry certificate is in the Appendix at page 43.

57. A true and correct copy of a letter confirming my ordination credentials to be in good standing is in the Appendix at page 44.

58. After the wedding, I felt inspired by God to begin a new phase of my ministry career by officiating and writing for weddings generally.

59. I realized that by officiating and writing homilies, vows, and prayers for weddings, I could satisfy my passion to serve others while promoting my religious beliefs about God's design for humanity.

60. I also realized that my ministry experiences had prepared me to begin a business officiating and writing for weddings by teaching me how to communicate the truths contained in the Bible to others, how to communicate well verbally and in writing, and how to orchestrate religious events by working closely with other people and coordinating details related to religious ceremonies.

61. So I decided to start Covenant Weddings to dedicate myself to celebrating weddings and promoting my religious beliefs about marriage.

62. In August 2019, the State of Ohio authorized me to solemnize marriages.

63. A true and accurate copy of the certificate authorizing me to solemnize marriages is in the Appendix at page 45.

64. To advertise the launch of my business, I published a post on my business' Facebook account in August 2019.

65. In the post, I introduced myself to the public and explained my business, my reasons for desiring to provide officiating and composition services to couples, and how my past ministry experience prepared me to provide wedding services as follows:

My name is Kristi Stokes, and I have been in ministry, of some capacity or another, since I was a teenager. I have worked as a children's minister, youth pastor, church administrator, associate pastor, missionary and pastors assistant. I have also worked with homeless ministries, drug/alcohol rehabs and street ministries.

I am a nationally licensed officiant. I have a Bachelors degree in Biblical Studies, a Masters degree in Pastoral Ministry and I am currently working on my PhD in Chaplaincy.

As you can see, my passion is for God's people and to minister to them in all facets.

I am also a creative writer who has dabbled in blogging for various churches and ministries.

In the last few years I have been asked to officiate weddings, funerals and special events. This has become quite a passion for me; melding ministry with writing!

I take great pride and find such joy meeting with each individual or couple, hearing their hearts, taking notes and weaving a script that matches their story and performing it on their special day.

Recently I was encouraged to start a social media page describing what I do, so that those that have entrusted their special day to me, can refer others!

So alas, here we are "The Officiant"!

If you or someone you know are looking for an out of the box script, that is tailor made to each individual wedding, special ceremony, wedding renewal or funeral, I just might be your gal!

Let's connect over a cup of something warm and weave your story into a script, made just for you and your special day!

66. The above post is viewable here:

<https://www.facebook.com/covenantweddingofficiant/photos/a.113521926685282/113521863351955/?type=3&theater>.

67. A materially similar post is also published on Covenant Weddings' Instagram account viewable here: https://www.instagram.com/p/B1sL3tqA_8P/.

68. A true and accurate screenshot of the Facebook post described in paragraph 66 is in the Appendix at pages 46–47.

69. I desire to expand my business and my online presence and to advertise more to promote my business and my message about marriage to more clients and individuals.

70. For example, I desire to attend and advertise at Today's Bride wedding show in Akron, Ohio, which provides wedding vendors an opportunity to meet with couples who attend the show and to advertise their services.

71. Information about the above exhibition is viewable here:
<https://pros.todaysbride.com/apply-to-exhibit-in-the-august-show/>.

72. A true and correct copy of the above application is in the Appendix at pages 45–50.

73. Likewise, I desire to promote my business in Today's Bride's magazine, which is distributed to prospective clients throughout Northeast Ohio.

74. Information about the above magazine is viewable here:
<https://todaysbride.com/our-magazines/view-online/>.

75. A true and correct copy of the above magazine is in the Appendix at pages 48–62.

76. But I have refrained from attending the exhibition or promoting my business in the magazine because I do not want to attract requests that will require me to engage in burdensome research, to respond immediately, to provide the requested service even when doing so violates my religious beliefs and editorial judgment, or to otherwise violate Cuyahoga County's law.

77. Likewise, I desire to sign up for HoneyBook, a subscription-based client management program that would help me manage my business processes more efficiently, so long as the subscription remains cost effective.

78. But HoneyBook's Conditions of Use permit HoneyBook to “suspend[] or terminat[] the account ... and report[] ... to law enforcement authorities” any subscriber who uses the service to “violate any applicable local, state, national or international law, or any regulations having the force of law.”

79. The above Conditions of Use are viewable here:
<https://www.honeybook.com/terms/terms-of-service>.

80. A true and correct copy of the relevant portions of HoneyBook's Terms of Service is in the Appendix at pages 63–65.

81. So I have refrained from signing up for HoneyBook because offering wedding services only for marriages between one biological man and one biological woman violates Cuyahoga County's law and therefore would violate HoneyBook's Conditions of Use.

82. Custom officiating and wedding writing services are becoming more popular.

83. For example, the following online directory from Wedding Wire lists 74 wedding officiants in Cleveland alone: <https://www.weddingwire.com/c/oh-ohio/cleveland-erie/wedding-officiants/510-9-rca.html>.

84. A true and correct screenshot of the relevant portions of the above directory is in the Appendix at page 66.

85. Wedding Wire also published an article stating “that hiring someone to write your vows is now commonplace, and akin to hiring a cake baker or photographer.”

86. The above statement is viewable here: <https://www.weddingwire.com/wedding-ideas/wedding-vow-writer>.

87. A true and correct copy of the above statement is in the Appendix at pages 67–69.

Covenant Weddings celebrates marriages between one man and one woman.

88. When I started Covenant Weddings, I wanted to use the officiating and composition services as platforms to help premarital couples progress towards marriage, to celebrate and encourage couples at the beginning of their marriage, and to promote my religious beliefs about marriage to the couple, their family, and the public.

89. When I receive a wedding-services request from the public, I ask the person requesting the service for information about the upcoming wedding, including the names of the marrying couple, content in the wedding, and themes for the wedding.

90. I want to ask prospective clients “Do you seek my services to celebrate a same-sex wedding?” and “Do you seek my services to celebrate a wedding where either participant identifies contrary to their biological sex?” or something materially similar to these questions.

91. I do not currently ask these questions because I understand Cuyahoga County has a law that prohibits me from doing so.

92. I believe that by asking the questions in paragraph 91 (or a materially similar one) upfront, I can avoid giving a false impression about the types of services I can and cannot provide, I can avoid wasting a prospective client’s time and resources, and I can focus my time and resources on providing only those services I am actually willing to provide.

93. Instead, I do internet research about the wedding and the marrying couple to determine whether fulfilling the requested services and creating content requested in those services has the potential to violate or conflict with my religious beliefs.

94. After completing my research, I evaluate the request and decide whether I can potentially provide the requested services.

95. When evaluating whether any request for my wedding services is consistent with my religious beliefs, I consider, and it is my policy and practice to consider, the messages conveyed by the requested services and whether these services require me to participate in or create content for a ceremony I object to, not the identity of who requests or pays for those services or the identity of the people I will be working with. *See infra* ¶¶ 176–85, 213–14, 255, 269–85.

96. If I decide I can potentially provide the requested services, I try to build genuine relationships with my clients and share God's love with them.

97. I do this by scheduling a meeting with the bride or groom individually or together as a couple so that I can get to know them and discuss their wedding ceremony.

98. I typically hold these meetings face-to-face, but I would do so by video or phone if necessary.

99. During this meeting, I talk with the couple about my views on marriage and ask about their relationship, upcoming wedding ceremony, and requested wedding services to learn more about them as a couple.

100. If I determine that the requested wedding services would not violate, contradict, or be inconsistent with my religious beliefs, the client must sign a customized version of Covenant Weddings' form wedding services agreement.

101. I take these form service agreements and customize them to reflect the specific services to be provided and the price of those services.

102. A true and correct copy of the form service agreement for wedding services is in the Appendix at pages 69–72.

103. My wedding services begin at \$200 for the most basic services and increase from there depending on the types of services being requested by the client.

104. If I am hired to provide wedding services for a couple, I publish posts on Covenant Weddings' social media accounts in anticipation of the wedding ceremony to publicly encourage the couple, to celebrate their commitment to one another, to express my personal joy over their future union, and to promote my religious views on marriage to the couple and the public.

105. Posts that I have published on my social media accounts prior to providing wedding services for a couple include:

- It's always an honor to be asked to officiate a couples wedding, and the wedding of John Pantani and Taylor Powell for me, will be no different.

I am truly honored.

I am honored because their love, dedication and commitment to one another is very apparent to all who know them.

As I sat across from John & Taylor, taking notes for their wedding script, what stood out to me was their love for one another yes, but also their deep friendship. Friendship should be the foundation of every marriage because every lasting romance, starts and continues with friendship.

If you do not have friendship, you have nothing, and the cup of this special couples friendship, is filled to overflowing.

In exactly one month, today, I will have the great honor and joy of standing before John & Taylor's family and friends and pronouncing them husband and wife, friends for life!

John and Taylor, I am truly excited for you two, and I am continuously praying for your special day!

- It is the 🎵final count down🎵! Marriage license is in hand, hearts are full, smiles are big and the anticipation is building! 🎉

Friday, October 11, 2019 at 4:30 pm I will have the great honor of joining John and Taylor in holy matrimony 🙏🙏!
#teampantani

- As we get closer to the wedding day I wanted to leave you with a few words of wisdom...

The wedding celebration will be over in a blip, keep your eyes on the life that is ahead of you, celebrate your wedding day through that perspective....

Find a place in your marriage for God. In today's day and age He is the silent partner and glue that will keep us together against the odds.

Remember your vows. Every year on your anniversary, sit down and read them out loud. Commit to them all over again....

Love each other often and well.

Rehearsal dinner done! Wedding Celebration here we come!

- In exactly two weeks from today, on Sunday, December 15, 2019 I will have the great honor of officiating the wedding of an old school mate, Matt Bohach and his beautiful fiancé Kate Krause!

As I met with Matt and Kate I sat there so impressed with the maturity of their love. They get each other and they know their love and what they want for their future together. This kind of love is rare these days.

Matt and Kate are deeply rooted in one another and know each other well. I loved witnessing how Matt looked at Kate as he spoke about her, why he loves her and how she is with his daughter Breannah; watching how Kate's eyes lit up as she remembered their first date, the way she felt when she first saw Matt and how she knew Matt was the one.

This is a union I truly believe in and I can't wait to get their nuptials started!

- It's the final countdown! In less than 24 hours I will have the great honor of joining Kate Krause and Matt Bohach in holy matrimony! 🧑‍🤰🧑‍🤲

106. These comments are materially similar to all comments I write and post prior to providing wedding services for a couple.

107. The above posts published on Covenant Weddings' Facebook account are viewable here:

https://www.facebook.com/pg/covenantweddingofficiant/posts/?ref=page_internal.

108. True and accurate screenshots of the above Facebook posts, and materially similar posts published on Covenant Weddings' Instagram account, are in the Appendix at pages 73–77.

109. If I am hired to provide officiating services, I also offer to help plan and prepare the wedding, to coordinate the wedding rehearsal, to pray during the rehearsal dinner, and to pray during the wedding reception.

110. On the day of the rehearsal—if I am hired to assist with the rehearsal—I prepare myself in prayer, review my notes for the ceremony, arrive at the rehearsal location, review any last minute details with the couple, and practice the ceremony until everyone feels comfortable.

111. If I am invited to the rehearsal dinner, I also lead the attendees in a blessing for the food and pray for the couple's marriage.

112. On the day of the wedding, I arrive to the wedding venue early and check in with the bride and groom and interact with the guests as they arrive.

113. I then take my position at the front of the wedding audience and begin leading the wedding ceremony.

114. Even if I am hired to only provide officiating services—and do not write a custom homily or custom vows or prayers—my officiating services always celebrate marriage, recognize God's authority over marriage, describe marriage as a relationship which is intended to be a lifelong relationship between one man and one woman, and use gender-differentiated language such as the couple's names or gender-differentiated pronouns or by referring to the couple as husband and wife.

115. For example, the vows I administer refer to the bride as "wife" and the groom as "husband" or other materially similar references.

116. After the vows, I always pronounce the couple as "husband and wife" by virtue of my authority vested in me by God and by the state and tell the husband that he may "kiss your bride."

117. I always present each newlywed couple for congratulations to the guests as "Mr. & Mrs."

118. I also express my own personal joy and approval of the marriage at each wedding ceremony by announcing that I present the newlywed couple as husband and wife “with great honor and joy” or something materially similar.

119. A true and correct copy of the script of a wedding that I officiated and for which I did not write custom homilies, vows, or prayers for the couple is in the Appendix at pages 78–79.

120. True and correct copies of the scripts of wedding ceremonies that I officiated and for which I wrote custom homilies, vows, and prayers are in the Appendix at pages 80–86.

121. If I am invited to the wedding reception, I say a blessing for the food and pray for the couple’s marriage.

122. For each wedding for which I have provided officiating services in Cuyahoga County, I have submitted a certificate of marriage to the County within 30 days of solemnizing the marriage, as required by law.

123. True and correct copies of the marriage certificates I have submitted to the Cuyahoga County are in the Appendix at pages 87–88.

124. Whenever I submit a marriage certificate in Cuyahoga County, I publish a post on Covenant Weddings’ social media accounts with a picture of me mailing the certificate to the Cuyahoga County to inform the couple that I have mailed it and to advertise the breadth of my officiating services.

125. Posts of me mailing the marriage certificate are viewable here:

- <https://www.facebook.com/covenantweddingofficiant/photos/a.113521926685282/140310197339788/?type=3&eid=ARCZb0Bhs5mgLRyEar581O2-gPDXtTwPR7DEZkR96I10HQ-wb9To Nrljn6aTJENVmUdDAcsKGcwKl1&tn=EEHH-R;>
- <https://www.facebook.com/covenantweddingofficiant/photos/a.113521926685282/164350978269043/?type=3&eid=ARA9pqqp3E5HYYvou803Th>

[qBK0Ame lF S4zip9AAaAldW8VgbbsrTFyaUtyK7KM62uWHPl1rJdc VyJe& tn =EEHH-R;](https://www.instagram.com/p/B3n8Z1OAZO9/)

- <https://www.instagram.com/p/B3n8Z1OAZO9/>; and
- <https://www.instagram.com/p/B6bZaWPJetC/>.

126. True and accurate screenshots of the above Facebook posts are in the Appendix at pages 89–91.

127. If I am hired to provide composition services, I begin my drafting process by asking the couple questions to learn about their relationship.

128. I also discuss with the couple specific Bible verses to include in the homily and consider their suggestions and offer my own.

129. Then I begin drafting the custom homily, vows, or prayer by describing marriage and their relationship and by weaving Bible verses—implicitly and explicitly—throughout the custom writing.

130. All of my composition services always celebrate marriage in general and the marrying couple in particular.

131. All of my composition services are custom and tailored in some way to the couple and marriage I am writing about.

132. My composition services always highlight the couple's love for each other and their commitment to marriage, celebrate God's gift of marriage between one man and one woman, illustrate how marriage between a man and a woman reflects God's love for His creation, reference the lifelong commitment of marriage between one man and one woman, use gender-differentiated language about the couple, and recognize God's authority over marriage.

133. I always quote Scripture in the custom homilies I write.

134. I also always use Scripture as the basis and inspiration for the custom vows and prayers I write.

135. I state my belief in the permanence of marriage in my homilies by reciting Bible verses about love, by reminding the couple of their commitment to each other, and by including statements like “nothing will separate the beautiful union of your two souls joining together as one today, before the eyes of loved ones and God,” love is “the anchor that will center them in times of trouble and the sail that will always bring them back to one another,” or by making materially similar statements.

136. I state my belief in the permanence of marriage in the vows I write for couples with phrases like, “in sickness and in health,” “till death do us part,” “now and forever,” or other materially similar statements.

137. I state my belief in the permanence of marriage in my prayers by asking God to maintain the couple’s commitment to each other or other materially similar statements.

138. I state my belief in the monogamous nature of marriage in my homilies with phrases like a wedding “ceremony presents us with a wonderful opportunity to celebrate the love shared between these two souls,” by telling the couple to “commit” to love each other, or other materially similar statements.

139. I state my belief in the monogamous nature of marriage in the vows I write for couples with phrases like “forsaking all others,” “constant faith,” or other materially similar statements.

140. I state my belief in the monogamous nature of marriage in my prayers by praying for the union of the couple and asking God to bless the marriage or other materially similar statements.

141. I state my belief that marriage is a covenantal union between one man and one woman in my homilies with phrases like “holy matrimony,” “before the eyes of loved ones and God,” marriage is “the very reflection of the love of God,” or other materially similar statements.

142. I state my belief that marriage is a covenantal union between one man and one woman in the vows I write for couples with phrases like “nothing will separate,” “as long as you both shall live,” or other materially similar statements.

143. I state my belief that marriage is a covenantal union between one man and one woman in the prayers I write by asking God to bless the marriage or other materially similar statements.

144. I state my belief that marriage is a gift from God in my homilies with phrases like “the gift of marriage is miraculous,” “God’s divine recipe for love,” or other materially similar statements.

145. I state my belief that marriage is a gift from God in the vows I write for couples with phrases like “to have and to hold,” “to love and to cherish,” or other materially similar statements.

146. I state my belief that marriage is a gift from God in my prayers by thanking God for the marriage or other materially similar statements.

147. I state my belief that marriage is a relationship between one biological man and one biological woman in my homilies by asking the bride’s father (or representative) “who gives this woman to this man,” referring to the couple as bride and groom or husband and wife, or making materially similar references to their biological sex.

148. I state my belief that marriage is a relationship between one biological man and one biological woman in the vows I write for couples by referring to the man as “him” and the woman as “her,” by asking the man “do you take this woman to be your wife,” by asking the woman “do you take this man to be your husband,” by instructing the groom that he may “now kiss your bride” once the vows have been performed, or by making materially similar references to their biological sex.

149. I state my belief that marriage is a relationship between one biological man and one biological women in my prayers by using gender-differentiated language such as the couple's names or gender-differentiated pronouns.

150. When I provide composition services, I professionally print a copy of the homily, vows, or prayers I create for each couple and ask that they read it together every year on their anniversary and recommit their vows.

151. One couple even hung their copy of the wedding script I created on their wall as described in the couple's Facebook post, which stated: "Our entire ceremony script ❤️🔒 Thank you for being so amazing The Officiant , you explained our love perfectly. And thank you for giving us this script, it means everything."

152. The above post is viewable here:

<https://www.facebook.com/photo.php?fbid=2710090605689872&set=a.204084582957166&type=3&theater>.

153. A true and accurate screenshot of the above post is in the Appendix at page 92.

154. I shared this story in a post on Covenant Weddings' Instagram account to encourage couples to "reflect on their love for each other always."

155. The above post is viewable here:

<https://www.instagram.com/p/B35WmTNgOE1/>.

156. A true and correct screenshot of the above post is in the Appendix at page 93.

157. Within a few days after I provide wedding services for a client, I start to publish posts on Covenant Weddings' social media accounts to celebrate the couple's wedding, encourage the couple as they begin their life together, to express my personal reflections on the wedding ceremony, and to promote my religious views on marriage to the couple and the public.

158. Posts that I have published on my social media accounts after providing wedding services for a couple include:

- It's official! Mr. & Mrs. Pantani!

Beautiful couple, beautiful family and friends and an absolutely beautiful wedding and celebration from start to finish.

It was my great honor to officiate John & Taylor's wedding.

- Congratulations to the new Mr. & Mrs. Bohach! Matt & Kate it was my sincerest honor to officiate your wedding today! I pray you have a long, healthy and happy life together!
- This moment! It is my favorite part of a wedding ceremony and it is written all over my big happy cheesy smile! Can we talk about the joy on those two beautiful faces!?! 10/11/19
- December 29, 2018 I had the high honor of officiating Gage and Sarah Ritchie's wedding..

It was a beautiful day in Florida, filled with so much love from family and friends, but that love pales in comparison to the authentic and sincere love shared between Gage and Sarah!

One down many, many more to go! I'm rooting you on! Happy 1st Anniversary Gage and Sarah! Thank you for entrusting your special day to me.

159. These comments are materially similar to all comments I write and post after providing wedding services.

160. The above posts are viewable on Covenant Weddings' Facebook account here:

- <https://www.facebook.com/covenantweddingofficiant/photos/a.113521926685282/139892677381540/?type=3&eid=ARDpsJrXhGXQKmuoqbnMYc-YCooypttoyPvY2KaWSldKxooSAKGNOrCzzeA6Alb1jIUzPAuuaktDifZR&tn=EEHH-R;>
- <https://www.facebook.com/covenantweddingofficiant/photos/a.113521926685282/161799851857489/?type=3&eid=ARAK8q3SO1ImaSpJrSixdK>

[C3NmfWXu5jBVytvBwvWlhQGT45mGu2pvQ8sGXwMT2kIEnqNLzAIGnUbdJ& tn =EEHH-R;](#)

- <https://www.facebook.com/covenantweddingofficiant/photos/a.113521926685282/160469878657153/?type=3&eid=ARCPc4d6gIp8-MBP3vctC i8nZ9AwoXAMdDYHBytgJqsf6ubzG5Erdng9rdi9RahxMs5z5MMZpGE- mw& tn =EEHH-R;> and
- <https://www.facebook.com/covenantweddingofficiant/photos/a.113521926685282/166367604734047/?type=3&eid=ARBRV ma6J8lhawqqxj06rxZz9B3OZqlkISyqz0-J0nBKKhD2I3KGrpsaxG3-VshmKYJvyjCqRRiqS7a& tn =EEHH-R.>

161. True and accurate screenshots of the above posts and materially similar posts published on Covenant Weddings’ Instagram account are in the Appendix at pages 94–97.

162. In addition to publishing posts on Covenant Weddings’ social media accounts about wedding services that I have provided, I also publish posts about my personal religious views on marriage in general.

163. Posts that I have published on my social media accounts about my religious beliefs on marriage include:

- Marriage is most prosperous and lasting when we function in unity in everyday life, with each other, and God—then, a three cord strand will not be easily broken.
- Ephesians 4:2 tells us that while in a relationship with someone we should be...
completely humble
gentle
patient
And bear with one another in love ...
- Whether we are religious or not, this fundamental truth found in 1 Corinthians 13:4-5 can be applied to all of our lives. The writer Paul reminds us that

Love is...

♥ patient

♥ kind

- ♥ does not envy
- ♥ does not boast
- ♥ does not dishonor others
- ♥ is not self-seeking
- ♥ is not easily angered
- ♥ keeps no record of wrongs

- It's easy to get caught up in where you are now as a couple, but sometimes in order to bring things back into perspective you need to remember. Remember how you met or why you fell in love in the first place. Why you chose to commit forever to this specific person. Shift your focus onto the good things that embody the person you are married to. Be present. Choose to ignore the chaos surrounding you and reflect on truth.

“Whatever is true, whatever is noble, whatever is right, whatever is pure, whatever is lovely, whatever is admirable if anything is excellent or praiseworthy think about such things.”

Philippians 4:8

A different perspective can change EVERYTHING! Including US!

- Paul, the Author of the New Testament book Romans, implores us in chapter 12, verses 9-12 to hold our spouse in high esteem. Let's take a look at this portion of scripture and take a moment to unpack it....

Marriage goes on long after the beautiful, joyous wedding is over, are you prepared to practice these principles until “death do us part”?

- Christ gave himself up for us, the church; he sanctified and cleansed us so that when we are presented before him one day we will be without spot or wrinkle or any such thing, that we may be holy and without blemish...

Then the writer says “in the same way husbands should love their wives...”

Pause.. woah..

Husbands, fiancés, boyfriends, how many of you right now, in this moment, if you were to find yourself standing before God would be able to present your wives free of spots, wrinkles, blemishes and Holy (uncorrupted)?

Or would the markings of your words, actions, and lack of dedication to her and only her, be marked clearly upon her?

On the day you committed your life to your wife you not only promised her, her parents and her friends that you'd love, honor and protect her, you also promised God. He desires that you fulfill this promise.

- Married couples, what are some practices that you have put into place to ensure you are mutually working towards not only a FOREVER kind of marriage, but also a happy one? Engaged couples, what goals will you implement into your marriage after your wedding celebration?



■ Remember you either “plan to succeed, or you plan to fail” and this is especially true with marriage.

- Happiness in marriage is not something that just happens.

A good marriage must be created. In marriage the little things are the big things....

Let Covenant Weddings guide you in the pursuit of this kind of love.

164. These comments are materially similar to all comments I write and post about marriage.

165. The above posts are viewable on Covenant Weddings' Facebook account here:

https://www.facebook.com/pg/covenantweddingofficiant/posts/?ref=page_internal.

166. True and accurate screenshots of the above posts and materially similar posts published on Covenant Weddings' Instagram account are in the Appendix at pages 98–110.

167. Posting on Covenant Weddings' social media accounts is integral to my business.

168. Posting on Covenant Weddings' social media accounts allows me to advertise my business by publicly promoting my wedding services, my officiating

and writing style, my approach to officiating and writing for weddings, and my personality to prospective clients and the general public.

169. Posting on Covenant Weddings' social media accounts also provides my clients with something valuable by publicly celebrating their marriage to a larger audience than otherwise possible, becoming affiliated with Covenant Weddings' brand, encouraging their loving commitment towards one another, and offering my insights into marriage before and after their wedding ceremony.

170. I often "tag" my clients in my social media posts so that my clients' friends and family are more likely to see the post, so that I can more widely share my personal joy about the couple's wedding, and so that I can more widely share my personal religious views about marriage.

171. All of this allows me to attract potential clients.

172. Posting on Covenant Weddings' social media accounts also allows me to fulfill my religiously motivated desire to love God, serve others, and proclaim biblical truth by promoting God's love for His creation and my religious beliefs about marriage and celebrating and encouraging the marriage of my clients to a broad audience.

173. I will use Covenant Weddings' website in materially similar ways that I use Covenant Weddings' social media accounts and post materially similar comments to Covenant Weddings' website once I publish that site. *See supra* ¶¶ 157–71.

174. Other commissioned wedding officiants publish posts on their websites or social media sites, make congratulatory comments about weddings they officiate, and explain their personal beliefs about marriage. For examples, *see infra* ¶¶ 290–391.

175. But my social media posts allow me to distinguish myself from other commissioned wedding officiants and writers by enabling me to explain my unique approach to wedding services and my specific beliefs about marriage.

My editorial discretion to officiate and write consistent with my religious beliefs.

176. I promote my religious beliefs about marriage and God's design for humanity through the wedding services I provide at Covenant Weddings.

177. For example, through my wedding services at Covenant Weddings, I promote my religious belief that God ordained marriage to be a covenant between one man and one woman that reflects and points people to the special covenantal relationship Jesus shares with His Church. (Genesis 2:18–24; Matthew 19:4–6; Ephesians 5:22–33).

178. I also promote my religious belief that God created marriage to be a sex-differentiated union, meaning marriage can only be between one biological man and one biological woman. (Genesis 2:22–24).

179. I also promote my religious beliefs about the human person, human identity, and gender, including that God created every person in His image to be male or female, that a person's sex is based on their biology, including their chromosomes, is fixed from the moment of conception, and cannot be chosen or changed, and that people should act and identify consistent with their God-given biological sex. (Genesis 1:27; Deuteronomy 22:5; 1 Corinthians 11:14–16).

180. I believe that I have a religious calling to use my God-given talents to honor Him, including by officiating weddings and creating aesthetically pleasing artistic works, such as homilies, vows, and prayers, which promote God's love, God's design for marriage, the beauty of marriage, my religious beliefs about marriage and gender, and the biological differences between men and women. (Matthew 25:14–30).

181. I also believe that everything I do should be done to glorify God and that I should steward my God-given gifts in a way that glorifies and honors Him. (1 Corinthians 10:31; 2 Corinthians 5:15; Colossians 3:17; 1 Peter 4:10–11).

182. Because of these beliefs, I cannot rejoice in, condone, participate in, celebrate, or promote anything dishonorable to God. (Isaiah 5:20; Ephesians 5:1–14; 1 Timothy 5:22; 1 Corinthians 10:1–22; 2 Corinthians 6:14–18).

183. For these reasons, I only accept requests for wedding services which are consistent with my editorial, artistic, and religious judgments.

184. My editorial control is included in Covenant Weddings' Services Agreement which states "Minister retains complete artistic and editorial freedom to decide whether to provide any aspect of the Wedding Services. Client also agrees that Minister retains complete artistic and editorial freedom over every aspect of Minister's Wedding Services, including composing homilies, vows, and prayers, officiating the wedding ceremony, praying during the rehearsal or reception, and all other aspects of the Wedding Services. Minister reserves the right to reject any request or suggestion that violates Minister's religious or artistic standards."

185. Likewise, Covenant Weddings' Services Agreement provides me with "the right to terminate this Agreement if Minister subsequently determines, in Minister's sole discretion, that the requested Wedding Services would require her to participate in a ceremony or event or communicate an idea or message which violate, contradict, or are inconsistent with Minister's artistic or religious beliefs."

186. It is common practice for commissioned wedding officiants to limit their services based on their editorial or religious judgments.

187. For example, Reverend James Hary states on The Knot that he does "weddings by traveling throughout the Cleveland Akron areas by going to reception halls, homes, and parks for anyone anywhere, except same sex."

188. The above statement is viewable here:

<https://www.theknot.com/marketplace/rev-james-hary-strongsville-oh-687190>.

189. A true and correct screenshot of the above statement is in the Appendix at page 111.

190. The Wedding B's Contract for Wedding Officiant Services states "The Officiant reserves the right to refuse any service that she is not comfortable performing ..."

191. The Wedding B's Contract for Wedding Officiant Services is viewable here: <https://theweddingb.files.wordpress.com/2014/03/the-wedding-bcontractdoc4.pdf>.

192. A true and correct copy of the Wedding B's Contract for Wedding Officiant Services is in the Appendix at pages 112–115.

193. Wedding Pastor Ken states in its Wedding Ceremony Agreement and Contract that the "Officiant has sample services available for the couple or the couple may choose to modify the samples, create a ceremony or use one of their own choosing. The Officiant reserves the right to refuse any service that he is not comfortable performing, at which time a refund may be made to the couple."

194. Wedding Pastor Ken's Wedding Ceremony Agreement and Contract is viewable here: <https://www.weddingpastorken.com/contract>.

195. A true and correct copy of Pastor Ken's Wedding Ceremony Agreement and Contract is in the Appendix at pages 116–121.

196. Weddings with Serenity states in its Officiant Contract that the "Officiant reserves the right to refuse any request for a reservation and further reserves the right to refuse to perform any service that he/she is not comfortable with, even though a reservation was accepted."

197. The above statement is viewable here:

<https://www.weddingswithserenity.com/officiant-contract.html>.

198. A true and correct copy of the Weddings with Serenity’s Officiant Contract is in the Appendix at pages 122–127.

199. It is also common practice for religious ministers to only officiate weddings consistent with their religious beliefs.

200. For example, Jewish rabbis who are members of the Rabbinical Assembly, an international association of conservative rabbis, can “officiate at weddings only if both parties are Jewish” according to “A Code of Professional Conduct for Members of the Rabbinical Assembly.”

201. The above code of professional conduct is viewable here: https://www.rabbinicalassembly.org/sites/default/files/public/ethical_guidelines/code-of-conduct-2018-members.pdf.

202. A true and correct copy of the relevant portions of the above code of professional conduct is in the Appendix at pages 128–131.

203. Catholic priests may refuse to officiate weddings where one member of the couple is a divorcee whose prior marriage has not been annulled. The United States Conference of Catholic Bishops states “unless one’s spouse has died, the Church requires the divorced Catholic to obtain a declaration of nullity before marrying someone else.”

204. The above statement is viewable here: <http://www.usccb.org/issues-and-action/marriage-and-family/marriage/annulment/index.cfm>.

205. A true and correct copy of the above statement is in the Appendix at pages 132–134.

206. It is also common practice for custom wedding writers to limit their services based on their editorial or religious judgments.

207. For example, Tim Greathouse's officiating business based in Ohio states the following exchange on the FAQ section of his website:

Can we read and edit the ceremony you've written for us?

No. I ask that couples trust that I'll compose the perfect ceremony for them, and because of this, I don't allow them to read it ahead of time. The words will have much more impact if you hear them for the first time on your actual wedding day.

208. The above statement is viewable here:

<http://www.timothygreathouse.com/about-tim-greathouse/finding-a-wedding-officiant/>.

209. A true and correct copy of the above statement is in the Appendix at pages 135–144.

210. Marriage With Meaning's Booking Contract states as follows: "I don't write religious based ceremonies but I am comfortable talking about your faith being important to you and playing a role and purpose for you within your marriage. I am also open to scripture readings or readings that have religious themes. I don't personally offer prayers or blessings but am happy to give space for someone to step up and offer a prayer or blessing to mirror your faith."

211. The above statement is viewable here:

<https://www.marriagewithmeaning.com/booking>.

212. A true and correct copy of the Marriage With Meaning's Booking Contract is in the Appendix at pages 145–146.

213. Similar to the discretion that religious ministers and custom wedding writers commonly exercise, I would decline requests for wedding services if the request required me to officiate any ceremony or create any writing that promoted or positively portrayed anything immoral, dishonorable to God, or contrary to my religious beliefs.

214. For example, I would decline requests to provide wedding services for a marriage between one man and one woman for certain themed weddings or weddings where I would be required to minimize the solemnity of marriage or to portray marriage negatively because the requested wedding content would contradict my belief that wedding ceremonies solemnize and initiate an institution (marriage) ordained by God and my belief that wedding ceremonies must recognize God's authority over marriage.

215. Other wedding officiants exercise their editorial and religious judgments differently than I do.

216. For example, Rev. Angelle Keiffer states on her wedding officiant website that she serves "Lake County, Cuyahoga County, & All of Northeast Ohio" and performs "[r]enaissance weddings, Halloween weddings" and "can design almost any theme you might desire for your ceremony."

217. The above statements are viewable here:

<http://angellesmusic.com/ohioweddingceremonies/CustomWeddingCeremony.html>.

218. A true and correct copy of the above statement is in the Appendix at pages 147–155.

219. Likewise, Life's Precious Vows' website contains script excerpts for a Halloween themed wedding.

220. The above excerpts are viewable here:

<https://www.preciousvows.com/order-whimsical-halloween-themed-wedding-ceremony.html>.

221. A true and correct copy of the above script is in the Appendix at pages 156–163.

222. American Marriage Ministries describes itself as a “non-profit, interfaith and non-denominational constitutional church” which “provides free ordination, advocacy, and training for our ministers to ensure that all people have the right to get married and to perform marriage. To date, we have ordained over 699,218 ministers who have officiated weddings all across the United States.”

223. The above statement is viewable here: <https://theamm.org/about>.

224. A true and correct copy of the above statement is in the Appendix at pages 164–169.

225. American Marriage Ministries’ website contains an article entitled “How to Plan a Star Wars Wedding Ceremony.”

226. The above article is available here: <https://theamm.org/wedding-training/theme-weddings/star-wars>.

227. A true and correct copy of the above article is in the Appendix at pages 170–183.

228. Likewise, the website of the Great Officiants contains a script for a Star Wars themed wedding, which ends by stating “By the power vested in m[e] by the Jedi council I now pronounce you Husband and wife.”

229. The above statement is viewable here: <https://greatofficiants.com/blog/may-the-force-be-with-you-from-jedi-bob-at-this-star-wars-wedding-ceremony/>.

230. A true and correct copy of the above statement is in the Appendix at pages 184–189.

231. The following photograph also appears on the Great Officiants’ website:



232. The above photograph is viewable here:

<https://greatofficiants.com/blog/more-jedi-wedding-pictures/#jp-carousel-1119>.

233. A true and correct screenshot of the above photograph is in the Appendix at page 190.

234. Joint Vows states on its website that it is “a group o[f] Professional Wedding Officiants who honor couples legal choices in regards to incorporating cannabis in their wedding ceremony.”

235. The above statement is viewable here: <https://www.jointvows.com/>.

236. A true and correct screenshot of the relevant portion of the above statement is in in the Appendix at page 191.

237. The following photograph appears on Joint Vows’ Instagram account:



238. The above photograph is viewable here:

<https://www.instagram.com/p/BPGW8ZXjwGH/>.

239. A true and correct screenshot of the above photograph is in the Appendix at page 192.

240. Steve Greer Weddings states on its website that “Steve is a Florida notary and performs Elvis weddings all over Florida! With a huge choice of Elvis songs and several replica costumes, Elvis will perform your wedding or vow renewal on a stunning beach, a hotel, theme park, a private house or just about anywhere, whichever suits you.”

241. The above statement is viewable here:

<http://www.gettingmarriedbyelvis.com/elvis-weddings.html>.

242. A true and correct screenshot of the relevant portion of the above statement is in the Appendix at page 193.

243. The following officiating photograph appears on Steve Greer Weddings’ website:



244. The above photograph is viewable here:

<http://www.gettingmarriedbyelvis.com/elvis-weddings.html>.

245. A true and correct screenshot of the above photograph is in the Appendix at page 193.

246. Fantasy NYC Wedding Officiant states on its website that it performs “every type of ceremony; traditional fandom, gothic, dark, fantasy, sci-fi”

247. The above statement is viewable here:

<https://ulcministernegron.wixsite.com/nycweddingofficiant/about-us-reviews>.

248. A true and correct screenshot of the relevant portion of the above statement is in the Appendix at page 194.

249. The following officiating photograph appears on Fantasy NYC Wedding Officiant’s website:



250. The above photograph is viewable here:

<https://ulcministernegron.wixsite.com/nycweddingofficiant/gallery?lightbox=dataItem-k724syjx>.

251. A true and correct screenshot of the above photograph is in the Appendix at page 195.

252. Bill Camp officiates a wedding dressed as Captain Jack Sparrow from the Disney movie Pirates of the Caribbean and claims to officiate “12 to 15” weddings a year “dressed as Captain Jack.”

253. The above statement is viewable here: <https://www.sun-sentinel.com/features/fl-sf-jack-sparrow-weddings-20150814-story.html>.

254. A true and correct screenshot of the relevant portion of the above statement is in the Appendix at page 196.

255. Likewise, I would decline requests to provide wedding services for a marriage between one man and one woman if their requested wedding content did not recognize God’s authority over the marriage.

256. But some wedding officiants are willing to officiate ceremonies that do not recognize God.

257. For example, An Unusual Affair LLC advertises on The Knot that it provides officiating services in “[a]ll of Ohio & nationwide upon request” and is affiliated with the “Pagan” and “Wiccan” religions, among others.

258. The above advertisement is viewable here:

<https://www.theknot.com/marketplace/an-unusual-affair-llc-west-salem-oh-1046124>.

259. A true and correct screenshot of the relevant portions of the above advertisement is in the Appendix at page 197.

260. Unity Ceremonies advertises on The Knot that it provides officiating services in “Northeast Ohio and surrounding areas” and is affiliated with the “Wiccan” religion, among others.

261. The above advertisement is viewable here:

<https://www.theknot.com/marketplace/unity-ceremonies-gates-mills-oh-825389>.

262. A true and correct screenshot of the relevant portions of the above advertisement is in the Appendix at page 198.

263. And Chicago Pagan Weddings states on its website that it “conducts traditional Scottish Celtic and Norse Handfastings, as well as full pagan ritual, namings / wiccanings.”

264. The above statement is viewable here:

<http://www.chicagopaganweddings.com/home.html>.

265. A true and correct screenshot of the statement above is in the Appendix at pages 199.

266. According to the Encyclopedia Britannica, Wicca is “a predominately Western movement whose followers practice witchcraft and nature worship and who see it as a religion based on pre-Christian traditions of northern and western Europe.”

267. The above statement is viewable here:

<https://www.britannica.com/topic/Wicca>.

268. A true and correct copy of the above statement is in the Appendix at pages 200–203.

269. In addition to the types of wedding services listed in paragraphs 216–68, I would also decline requests for wedding services for a same-sex wedding, no matter who requested the service.

270. I would decline such a request because the requested wedding content violates my religious beliefs that God ordained marriage to be a covenant between one man and one woman that reflects and points people to the special covenantal relationship Jesus shares with His Church. (Genesis 2:18–24; Matthew 19:4–6; Ephesians 5:22–33).

271. I would also decline any requests for wedding services for a wedding where one or both of the marrying individuals identifies and presents as a gender other than their biological sex, no matter who requested the service.

272. I would decline such a request because the requested wedding content violates my religious beliefs that God created marriage to be a sex-differentiated union, meaning marriage can only be between one biological man and one biological woman, that God created every person in His image to be male or female, and that people should act and identify consistent with their God-given biological sex. (Genesis 1:27; Genesis 2:22–24; Deuteronomy 22:5; 1 Corinthians 11:14–16).

273. I would also decline to provide officiating services for the requests listed in paragraphs 269–72 because the wedding content violates my belief that a wedding is a sacred ceremony where the officiant participates in an institution (marriage) created by God and I cannot promote or participate in a sacred event that violates or is inconsistent with my religious beliefs.

274. And I would also decline to provide wedding services for the requests listed in paragraphs 269–72 because of my religious belief that I cannot celebrate and promote messages about marriage that violate, contradict, or are inconsistent with my religious beliefs.

275. I decline requested wedding services based on whether they would require me to participate in a ceremony or create content to which I object, not on the identity of who requests or pays for those services or the identity of the people I would work with.

276. For example, I would decline requests to provide wedding services for a marriage between one man and one woman if the couple intended their marriage to be an open marriage and their content to celebrate this open marriage as described in the New York Times article “Happily, Ever Open: What’s the wedding like when the couple is in an open or polyamorous relationship?”

277. The above article is viewable here:
<https://www.nytimes.com/2019/10/02/fashion/weddings/a-look-at-open-marriage-weddings.html>.

278. A true and correct copy of the above article is in the Appendix at pages 204–210.

279. I would decline such a request because the wedding content would require me to celebrate content contrary to my religious beliefs that God designed marriage to be an exclusive union between one man and one woman.

280. Likewise, I would decline a request to provide wedding services for a same-sex wedding even if the request came from a married man and woman for their son’s marriage to another man.

281. But, I would officiate or write for a wedding between one man and one woman if I were hired by the bride’s gay father or by the groom’s mother who identifies as male.

282. I would officiate or write for a wedding between one man and one woman if any of the bridesmaids or groomsmen were in a same-sex relationship or marriage.

283. I would officiate or write for a wedding between a man and a woman when either of them is struggling with gender dysphoria so long as they are committed to identifying and presenting consistent with their biological sex.

284. I would officiate or write for a wedding where a bisexual female bride marries a male groom so long as the couple intends the marriage to be a lifelong union between one man and one woman.

285. I would officiate or write for a wedding where a homosexual male groom marries a female bride so long as the couple intends the marriage to be a lifelong union between one man and one woman.

286. As for paragraphs 284–85, of adults who identify as gay or lesbian and currently raise children, about 18% have “a different-sex married spouse” according to a report by the Williams Institute.

287. A true and correct excerpt from the relevant portions of the above report are in the Appendix at pages 211–215.

288. Similarly, according to a Gallup report, 13.1% of LGBT persons are married to members of the opposite-sex.

289. A true and correct copy of the above report is in the Appendix at pages 216–221.

Other commissioned officiants perform same-sex weddings.

290. Many wedding officiants in Ohio officiate same-sex wedding ceremonies or wedding ceremonies where one or both of the marrying couple do not identify with or present as their biological sex, advertise their willingness to

officiate such wedding ceremonies, and express their support for such marriages by posting statements in favor of them on their websites and social media accounts.

291. For example, Tim Greathouse advertises on The Knot that he offers same-sex ceremony officiating services in “Akron, Canton, Cleveland, and all over Ohio.”

292. The above advertisement is viewable here:

<https://www.theknot.com/marketplace/tim-greathouse-ohio-wedding-officiant-akron-oh-488521>.

293. A true and correct screenshot of the relevant portions of above advertisement is in the Appendix at page 222.

294. The website of Tim Greathouse contains an article entitled “My Views on Gay Marriage” in which he states that “I will cheerfully perform a wedding ceremony for any consenting adults, regardless of gender or sexual orientation” and explains his views in support of same-sex marriage.

295. The above article is viewable here:

<http://www.timothygreathouse.com/about-tim-greathouse/same-sex-marriage/>.

296. A true and correct copy of the above article is in the Appendix at pages 223–228.

297. A Wedding to Cherish states on its website that it serves “local and out-of-town couples in the Cleveland, Akron, Canton and Northeast Ohio vicinity” and offers “Same-Sex” officiating services.

298. The above statements are viewable here:

<https://aweddingtocherish.com/> and here
https://aweddingtocherish.com/ohio_wedding_minister-oh/.

299. True and correct copies of the above statements are in the Appendix at pages 229–232.

300. Rev. Angelle Keiffer states on her website that she serves “Lake County, Cuyahoga County, & All of Northeast Ohio” and states the following exchange:

Q: Do you perform same sex or commitment ceremonies (gay weddings, gay marriage - affirmation of love, Gay, Lesbian, Trans-gendered, GLBT, Civil Unions)?

A: Yes, I do. The State of Ohio (and the entire USA) will now issue a marriage licenses to same-sex couples.

For those of you reading this paragraph who object to this practice, please consider the following: any person who approaches me and asks, “Will you please serve us, as a representative of God, so we may ask God to bless our love and our Union? We love each other so very much, and wish to present ourselves before God, and ask that S/he be part of our marriage from the beginning.” As a person of Faith, how could I deny such a request? I consider it an honor.

In my opinion, one of God’s most important lessons for humankind is the lesson of learning to Love. A couple who is taking that path is [sic] life IS abiding by God’s wishes, as far as I can tell.

In April 2005 I had the honor of performing one of the first Ohio weddings in which two women were able to obtain a legal marriage license due to the fact that one of them was originally born a man.

301. The above statements are viewable here:

<http://angellesmusic.com/ohioweddingceremonies/CustomWeddingCeremony.html>.

302. A true and correct copy of the above statement is in the Appendix at pages 233–241.

303. The Uncommon Officiant advertises on Wedding Wire that its officiant “perform[s] weddings in Columbus and the central Ohio region.”

304. The above advertisement is viewable here:

<https://www.weddingwire.com/biz/the-uncommon-officiant-columbus/d66e4e33a9a75f85.html>.

305. A true and correct screenshot of the relevant portion of the above advertisement is in the Appendix at page 242.

306. The Uncommon Officiant contains the following exchange on its website:

Do you perform gay weddings?

Absolutely. I've been performing LGBTQ weddings since before they were legal. I even had the honor of performing the first ever gay wedding at the Statehouse (May 13th, 2017) I am well versed with the nuances which accompany a same sex wedding or gender non-binary wedding. But like with everything else I do, I am happy to celebrate love in all of its forms.

307. The above exchange is viewable here:

<https://theuncommonofficiant.com/faq/>.

308. A true and correct copy of the above exchange is in the Appendix at pages 243–245.

309. Blonde and Ordained, LLC advertises on Wedding Wire that it has “married several couples in various locations throughout Northeast Ohio.”

310. The above advertisement is viewable here:

<https://www.weddingwire.com/biz/blonde-and-ordained-llc/31d1e1fd43ff0743.html>.

311. A true and correct screenshot of the relevant portion of the above advertisement is in the Appendix at page 246.

312. The website of Blonde and Ordained, LLC states that it offers same-sex wedding, elopement, commitment ceremony, and vow renewal services.

313. The above statement is viewable here:

<https://www.blondeandordained.com/>.

314. A true and correct copy of the above statement is in the Appendix at pages 247–248.

315. Two Shall Become One Ceremonies advertises on Wedding Wire that it “is a wedding officiant based in Akron, Ohio, serving the surrounding areas.”

316. The above advertisement is viewable here:

<https://www.weddingwire.com/biz/two-shall-become-one-ceremonies-richfield/8788e122ad9ae95b.html>.

317. A true and correct screenshot of the relevant portion of the above advertisement is in the Appendix at page 249.

318. Two Shall Become One Ceremonies states on its website that it offers “Same-Sex Ceremonies” which is a ceremony “that unites two people of the same gender.”

319. The above statement is viewable here:

<https://www.twoshallbecomeoneceremonies.org/services>.

320. A true and correct copy of the above statement is in the Appendix at page 250.

321. Great Conjunction Weddings advertises on Wedding Wire that it serves Northeast Ohio and that the officiants “are spiritual, accepting, and welcoming of all faiths and sexual orientations. Love is Love!”

322. The above advertisement is viewable here:

<https://www.weddingwire.com/biz/great-conjunction-weddings-youngstown/6b89eefa1323fb90.html#profile>.

323. A true and correct screenshot of the relevant portion of the above advertisement is in the Appendix at page 251.

324. Great Conjunction Weddings’ website makes the same statement.

325. The above statement is viewable here:

<https://greatconjunction.org/services/weddings>.

326. A true and correct screenshot of the relevant portion of the above statement is in the Appendix at pages 252–256.

327. Spiritual Inspiration Ministries advertises on Wedding Wire that it “is a professional wedding officiant service based in Macedonia, Ohio” and is “LGBTQ-friendly.”

328. The above advertisement is viewable here:

<https://www.weddingwire.com/biz/spiritual-services-ministry-chagrin-falls/23df51f2d5f5e8f9.html>.

329. A true and correct screenshot of the relevant portion of the above advertisement is in the Appendix at page 257.

330. Spiritual Inspiration Ministries’ website makes similar statements.

331. The above statements are viewable here:

<https://spiritualinspirationministries.com/about-us>.

332. A true and correct copy of the above statements is in the Appendix at pages 258–261.

333. An Unusual Affair LLC advertises on Wedding Wire that it is “a team of officiants ready to take on any type of wedding in Ohio” and they “have worked with couples to specialize in virtually any ceremony type including traditional, LGBTQ, cosplay, sci/fi, ren faire, and are always ready to take on something new.”

334. The above advertisement is viewable here:

<https://www.weddingwire.com/biz/an-unusual-affair-llc-west-salem/cfa90fd0a6961a61.html>.

335. A true and correct screenshot of the above advertisement is in the Appendix at page 262.

336. An Unusual Affair LLC states on its Facebook page that it “specializ[es] in cosplay, traditional, LGBTQ, personal and meaningful wedding ceremonies and life events.”

337. The above statements are viewable here:

https://www.facebook.com/pg/AnUnusualAffair/about/?ref=page_internal.

338. A true and correct screenshot of the above statements is in the Appendix at page 263.

339. Wedding in a Box states on its website that it is based in Cleveland, Ohio, provides “officiant services,” and is “LGBTQ+ friendly and welcoming to all with discounts available for Service members.”

340. The above statements are viewable here:

<https://www.marrymewib.com/about>.

341. A true and correct copy of the above statements is in the Appendix at pages 264–265.

342. Rev. Mary Grillot states on her website that she is a “Wedding Officiant, Ordained Minister in Ohio. LGBTQ Friendly.”

343. The above statement is viewable here: https://rev-mary-grillot.business.site/?utm_source=gmb&utm_medium=referral#summary.

344. A true and correct screenshot of the above statement is in the Appendix at page 266.

345. Unity Ceremonies states on its website that it “serve[s] couples; whatever their faith, beliefs and sexual orientation” and “offer[s] wedding officiant services in Cleveland and Northeast Ohio ranging from personal elopements to larger gatherings for couples looking for secular, non-denominational or interfaith ceremony.”

346. The above statement is viewable here:

<https://clevelandweddingofficiant.me/>.

347. A true and correct copy of the above statement is in the Appendix at pages 267–268.

348. Weddings for the Ages is based in Ohio and states its officiants “have experience performing weddings for same-sex, opposite-sex and non-binary couples.

We are more than happy to use whatever pronoun(s) you prefer and will design the ceremony to fit with your personal beliefs.”

349. The above statement is viewable here:

<https://www.weddingsfortheages.com/about-us>.

350. A true and correct copy of the above statement is in the Appendix at pages 269–272.

351. Many custom wedding writers in Ohio and elsewhere write custom scripts for same-sex wedding ceremonies or wedding ceremonies where one or both of the marrying individuals do not identify with or present as their biological sex, advertise their willingness to officiate such wedding ceremonies, and express their support for such marriages by posting statements in favor of them on their websites and social media accounts.

352. For example, the Uncommon Officiant offers script writing services and states on its website that its officiant is “well versed with the nuances which accompany a same sex wedding or gender non-binary wedding.” *See supra* ¶ 306.

353. The above services provided by the Uncommon Officiant are viewable here: <https://theuncommonofficiant.com/packages-and-fees/>.

354. A true and correct copy of the above services is in the Appendix at pages 273–274.

355. Rev. Daria Kathleen Sherman, PhD advertises on Wedding Wire that she is based in Ohio and her services include the “creation, preparation, writing of readings, prayers etc. for ceremony, rehearsal, and wedding ceremony” and that she “advocates marriage equality.”

356. The above advertisement is viewable here:

<https://www.weddingwire.com/biz/rev-daria-kathleen-sherman-phd-canton/19ad40fd7269ba52.html>.

357. A true and correct screenshot of the relevant portion of the above advertisement is in the Appendix at page 275.

358. Beth Stokes (no relation) offers vow writing and editing services and states on her website that she “proudly serve[s] people of all faiths, races, genders, ages, orientations, and cultures”

359. The above services are viewable here:

<https://www.wellwedbybeth.com/vow-writing>.

360. The above statement is viewable here:

<https://www.wellwedbybeth.com/about>.

361. A true and correct copy of the above services and statement is in the Appendix at pages 276–279.

362. Romance on the Go offers custom vow writing services and contains the following exchange on its website:

Do you work with LGBTQ couples?

Absolutely! Love is love, We do not discriminate[]

363. The above services are viewable here: <https://romanceonthego.com/vow-concierge>.

364. The above exchange is viewable here: <https://romanceonthego.com/faq>.

365. True and correct screenshots of the relevant portion of the above services and exchange are in the Appendix at pages 280–286.

366. Alice Soloway with Uncommon Weddings offers custom ceremony scripts and contains the following exchange on her website:

Do you perform LGBTQ ceremonies?

Absolutely! I am truly honored to celebrate the triumphant love stories of ALL couples who want to declare their commitment to spend their lives together as a married couple. I am happy to welcome local couples as well as couples from around the country and the world who choose to marry in New York.

367. The above services are viewable here:

<https://alicesolowayweddings.com/officiant-personalized-weddings-elopement-ceremony-nyc-hudson-valley/#script>.

368. The above exchange is viewable here:

<https://alicesolowayweddings.com/fees-and-faqs-how-to-personalize-wedding-ceremony-nyc-hudson-valley/>.

369. True and correct copies of the above services and exchange is in the Appendix at pages 287–292.

370. Vow Muse offers custom vow writing services and contains the following exchange on its website:

What kind of people do you generally work with?

- That’s one of our favorite things: we get to work with all kinds of people from all around the world. Our experienced has backed up our belief that #loveislove no matter what it looks like. We even created a pride edition of our wedding ceremony toolkit with gender inclusive language for couples who don’t identify as “bride” and “groom” so that everyone can craft a thoughtful, unique ceremony.

371. The above services are viewable here:

<http://www.vowmuse.com/custom-services>.

372. The above exchange is viewable here: <http://www.vowmuse.com/faqs>.

373. True and correct copies of the above services and exchange is in the Appendix at pages 293–303.

374. XO Juliet describes itself as “the premier wedding vow writing service” and explains on its website:

We welcome couples of all genders, races, religions, and sexual identities. Additionally, we uphold the values of self-identification and respect those who are non-binary, gender fluid, transgender, homosexual, bisexual, pansexual, atheistic, agnostic, or any other type of label you may place on yourself. (No worries though; we will not label you and will always follow your lead when it comes to how you identify and/or gender yourself and your partner when communicating with us.)

Restrictions do not belong here and heteronormativity has no home at XO Juliet HQ. We pride ourselves in our modern thinking, progressive mission, and desire to welcome and support humans from all walks of life.

375. The above statements are viewable here: <https://xojuliet.com/>.

376. A true and correct copy of the above statements is in the Appendix at pages 304–308.

377. The Instagram of XO Juliet also contains the following post:



378. The above post is viewable here:

<https://www.instagram.com/p/BY36Sf4hgum/>.

379. A true and correct screenshot of the above post is in the Appendix at page 309.

380. The Instagram of XO Juliet also contains the following post:



381. The above post is viewable here:

<https://www.instagram.com/p/BZJjrkJhW5T/>.

382. A true and correct screenshot of the above post is in the Appendix at page 309.

383. The Vow Whisperer offers custom vow writing services.

384. The above services are viewable here:

<https://thevowwhisperer.com/approach>.

385. A true and correct copy of the above services is in the Appendix at pages 310–314.

386. The Instagram of The Vow Whisperer contains the following post:



387. The above post is viewable here:

<https://www.instagram.com/p/B4DlaHaj2RH/>.

388. A true and correct screenshot of the above post is in the Appendix at page 315.

389. The Instagram of The Vow Whisperer also contains the following post:



390. The above post is viewable here:

<https://www.instagram.com/p/B4piACyn2uz/>.

391. A true and correct screenshot of the above post is in the Appendix at page 315.

392. Several wedding service providers post sample or actual scripts for same-sex weddings or gender-neutral weddings on their websites.

393. For example, American Marriage Ministries publishes a sample gender-neutral ceremony script on its website.

394. The above sample script is viewable here: <https://theamm.org/wedding-ceremony-scripts/23-gender-neutral-ceremony-script>.

395. A true and correct screenshot of the above sample is in in the Appendix at pages 316–317.

396. The website of For This Joyous Occasion Officiating Services and Seaside Ceremonies publishes a sample script entitled “Non-Religious Same-Sex Marriage Ceremony Bride/Bride.”

397. The above sample script is viewable here:

<https://www.forthisjoyousoccasion.com/non-religious-ceremony-same-sex-marriage-bridebride.html>.

398. A true and correct copy of the above script is in the Appendix at pages 318–321.

399. The website of New York Marriages publishes a sample script for a same-sex wedding ceremony between Kyle and James.

400. The above sample script is viewable here:

http://www.nymarriages.com/Sample_Same_Sex_Wedding_Ceremony.html.

401. A true and correct copy of the above script is in the Appendix at pages 322–323.

402. The website of Church of Ancient Ways Marie April Gismondi & Associates-Officiants publishes several scripts for same-sex weddings.

403. The above scripts are viewable here:

<https://www.churchofancientways.org/sample-wedding-ceremonies/same-sex-ceremonies/>.

404. A true and correct copy of the above scripts are in the Appendix at pages 324–354.

405. The website of Ceremonies of the Heart publishes a script for a same-sex wedding between “Donna and Karen.”

406. The above script is viewable here:

<https://ceremoniesoftheheart.net/same-sex-ceremony-2/>.

407. A true and correct copy of the above script are in the Appendix at pages 355–363.

408. The website of Wedding Ceremony Pro Indiana publishes a script entitled “Same Gender Wedding Ceremony Script With PDF.”

409. The above script is viewable here:

<https://www.weddingceremonypro.com/wedding-ceremonies/same-gender-wedding-ceremony-script-with-pdf>.

410. A true and correct copy of the above script is in the Appendix at pages 364–372.

411. I would decline to create any of the wedding scripts listed in paragraphs 392–410 or materially similar scripts because the wedding content promote and celebrate ideas which violate, contradict, or are inconsistent with my religious beliefs and omit ideas which are central to my religious beliefs.

412. I have personally visited and viewed each of the websites referred to in this Declaration on July 21, 2020.

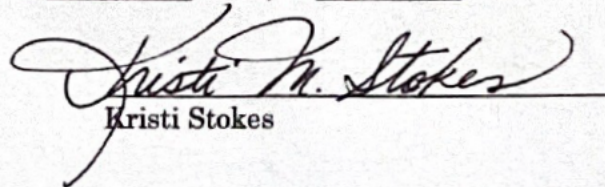
413. None of the statements found on any of the websites referred to in this Declaration were taken from a comment section or other forum for public comment.

414. I have personally viewed every document and other materials referred to in this Declaration and in the Appendix on July 21, 2020.

Declaration under penalty of perjury

I, Kristi Stokes, a citizen of the United States and a resident of the State of Ohio, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed this 21st day of July, 2020, at Parma, Ohio


Kristi Stokes