

REDACTED; NON-RELEVANT PERSONAL
INFORMATION AND FIRST AMENDMENT
PRIV.

From: Jason Salamone <[REDACTED]>

Sent: Thursday, June 7, 2012 4:55 PM

To: [REDACTED]

Cc: [REDACTED]

[REDACTED] Lindevaldsen, Rena M <rlindevaldsen@liberty.edu> [REDACTED]

Subject: Data Compiled on Lesbian Couples DV Rates; Higher Than Any Other Couple

People who endured a lot of hurt and neglect in their lives, especially during their childhood and adolescent/teen years from the people who were the most important in their lives at the time (mom, dad, siblings, close friends, etc) are more likely to develop hardened hearts.

As a defense mechanism, they become emotionally detached, but are often on the hunt for their mirror selves. They often seek the one who will draw them in with romantic intensity and then distance themselves when things get too close. Intimacy avoidant individuals unconsciously "check out" when their relationship starts to feel too close, whether related to an emotional, physical, or even spiritual connection.

Initially, the romance addict comes on strong. Sensing the unconscious fragility, abandonment fears and needfulness of their prospective partner. Then quickly moves into meeting their every unmet need – with seduction, warmth, and charm. A romanticized/sexualized relationship between two women is much more prone to excessive intensity, lack of privacy, a strong tendency for psychological fusion with a followed loss of the sense of one's separate feelings, and an inability to express or tolerate differences. (Emmeshment...loss of boundaries). The requirement of sensitive mutual understanding will inhibit healthy aggression, and a trend toward a suffocating exclusivity.

Because the identification is defined by their attractions as the foundation of their character and personality, they subconsciously perceive relationships as if they are sole answer to absolute happiness and utopia, and can't seem to connect the dots when it comes to the unbalanced nature of these homosexual relationships. As they crave and desire their relationships to be the answer to their happiness, they often struggle just to keep the relationship hanging on a thread. There is this constant struggle to supplant the role of the male into their lesbian relationships, which is impossible, and that's why the relationship either implodes so much and/or so quickly, or they become reduced to something that is really just the same as two roommates living together using each other as masturbatory aides, and then calling that "love."

As you will read, these unhealthy dynamics are factual outcomes to the nature of lesbian relationships according to the following data occurs much more often and in much greater frequency than a man and woman relationships...

Even as they are the most under-reported, lesbian couples continue to have the highest rates of domestic abuse and violence than any other couple, especially later in life as they have to confront the real world with real world responsibilities.

Although reported incidences of intimate partner violence, or IPV, are widespread, especially among women and certain ethnic groups, reported IPV is highest among lesbians, and second highest among homosexual male couples in California (one of the most pro-homosexual friendly states), and who are almost twice as likely to experience violence than heterosexual adults, researchers said.

http://www.sciencecodex.com/gays_and_lesbians_twice_as_likely_to_endure_intimate_partner_violence_as_heterosexuals

Also, reported by the National Coalition Against Domestic Violence, homosexual female (lesbian) couples are the highest, and homosexual males couples are the 2nd highest in domestic violence rates...

http://www.uncfsp.org/projects/userfiles/File/DCE-STOP_NOW/NCADV_LGBT_Fact_Sheet.pdf

EXHIBIT
5

RL01023

And there are even more studies that were conducted that back this up:

- Among lesbians, a 1985 study by Gwat-Yong Lie and Sabrina Gentlewarrier reported that slightly more than half of 1,109 respondents had been abused by a woman partner in their lifetime. (Gwat-Yong Lie & S. Gentlewarrier. *Intimate Violence in Lesbian Relationships: Discussion of Survey Findings and Practice Implications*, p. 46 (1991) 15 Journal of Social Service Research The Haworth Press)

- Coleman's 1990 study of 90 lesbians, for example, reported that 46.6% had experienced repeated acts of violence. (Coleman, V. *The Relationship Between Personality and the Perpetration of Violence*, Internet, Abstracted from Violence and Victims, Vol. 9, No. 2, 1994)

- Ristock's 1994 survey of 113 lesbians reported that 41% been abused in at least one relationship with another woman. (Ristock, J., *And Justice for All?...The Social Context of Legal Responses to Abuse in Lesbian Relationships*, (1994) 7 Canadian Journal of Women and the Law 420)

- In another one of Ristock studies of domestic abuse in in 2002, lesbian relationships, Ristock (2002) identifies first same sex relationships as high risk for domestic abuse. We would agree that first same sex relationships present a particular set of circumstances in which abuse may occur: the survivor's investment in wanting a same sex relationship as confirmation of their identity, sense of self, and the safer alternative to men if they have had bad relationships or experiences with men more than not; their lack of confidence in what behaviors are acceptable in intimate relationships; and their possible lack of embeddedness in LGBT friendship/community networks in which to air their concerns, see other relationship role models, and seek support and help in addressing the abuse they are experiencing.

For example, Audrey when she had her first lesbian relationship, which lasted for nearly 3 years. This was an abusive relationship, but she says it took her longer to understand it as such, because she was so exhilarated by her experience of it as her first lesbian relationship:

"Well, I think I'd always been very clear about what was going on, but suddenly I realized actually I was beginning to abuse myself by staying in this relationship and if that – and I knew, I just knew that if that had been a man, with a man – because my worst relationship (so far) was with a man. I would not have put up with three years of that actually. I would not. So why was it any different? Because this was a relationship with a woman and it was my first, I didn't want to believe it."

(Ristock, J. (2002) No More Secrets. Violence in lesbian relationships. Routledge: London.)

A study in the Journal of Interpersonal Violence examined conflict and violence in lesbian relationships...

The researchers found that 90% of the women in lesbian relationships surveyed had been recipients of one or more acts of aggression from their intimate partners during the year prior to this study, with 31% reporting one or more incidents of physical abuse. (Lettie L. Lockhart et al., "Letting out the Secret: Violence in Lesbian Relationships," pp. 469-492 Journal of Interpersonal Violence 9 (1994))

Another study of lesbian couples reported (2000) in the Handbook of Family Development and Intervention "indicates that 54 percent had experienced 10 or more abusive incidents, 74 percent had experienced six or more incidents, 60 percent reported a pattern to the abuse, and 71 percent said it grew worse over time." (William C. Nichols, et al, editors, *Handbook of Family Development and Intervention*, p. 393 (New York: John Wiley and Sons, Inc., 2000))

Studies of other populations in the LGBT "community" have documented even higher rates of abuse over respondents' lifetimes:

- The Portland, OR based Survivor Project's 1998 Gender, Violence, and Resource Access Survey of transgender and inter sex individuals found that 50% of respondents had been raped or assaulted by a romantic partner, even though only 62% of these individuals identified themselves as "survivors" of domestic violence when asked. (Courvant, Diana and Loree Cook-Daniels, 'Trans and Intersex Survivors of Domestic Violence: Defining Terms, Barriers, & Responsibilities,' www.survivorproject.org/defbarresp.html .)

- Another survey found that same-sex cohabitants reported significantly more intimate partner violence than did opposite-sex cohabitants. Among women, 39.2% of the same-sex cohabitants and 21.7% of the opposite-sex cohabitants reported being raped, physically assaulted, and/or stalked by a marital/cohabiting partner at some time in their lifetime. (Patricia Tjaden & Nancy Thoennes, U.S. Dep't of Just., NCJ 181867, *Extent, Nature, and Consequences of Intimate Partner Violence: Findings from the National Violence Against Women Survey*, at 30 (2000), available at www.ojp.usdoj.gov/nij/pubs-sum/181867.htm)

- Another study indicated that 83% of homosexuals report they have been emotionally abused by homosexual partners. (A

Descriptive Analysis of Same-Sex Relationship Violence for a Diverse Sample, The Journal of Family Violence, Publisher Springer Netherlands, Volume 15, Number 3, September, 2000, Pages 281-293. ISSN 0885-7482)

- 88% of victims in 2003 and 91 percent of victims in 2004 reported experiencing prior incidents of abuse, with the majority (45 percent and 47 percent, respectively) reporting having experienced more than 10 prior incidents. (Diane Dolan-Soto & Sara Kaplan, *New York Lesbian, Gay, Transgender and Bisexual Domestic Violence Report*, at 5 (2005), available at <http://www.avp.org/publications/reports/2005nycdvrpt.pdf>.)

And this continues to rise, as more states have legalized same sex "marriage" and society is becoming more and more "gay" affirming, domestic violence rates has risen an average of 15% since 2008 in persons who live the homosexual lifestyle and embrace the so-called LGBT identity (so much for so-called "homophobia")...

<http://www.enevnews.com/index.php/latest-news/gay-and-lesbian/19593-domestic-violence-has-risen-15-since-2008-among-lgbtq-population-nationally>

Here's an interesting article that reports on some domestic violence crimes between women involved in lesbian relationships in the ever-so pro homosexuality state of Massachusetts (notice the comments made below it too)...

<http://www.freerepublic.com/focus/f-news/2578014/posts>

Are homosexual couples harming each other emotionally and physically so much, because of the rest of society not accepting homosexuality (a.k.a. "homophobia")?...

The argument that homosexual behavior is "aye okay, because any distress they feel is based on how society treats them," is null and void...it's a lie.

It would stand to reason that if society's view/treatment of homosexuality improved, then their much higher levels of psychological and medical problems would decrease. This has not happened, and is not happening.

"Most people don't realize that "homophobia" is not an actual scientific term, but was invented by "gay" marketing experts to manipulate public opinion and silence opponents. Originally, "homophobia" was psychiatric jargon invented to describe patients' fear of their own homosexual inclinations. Homosexual activists simply stole the term and redefined it as "hate and/or fear of homosexuals." They use it as a rhetorical weapon to define anyone who disagrees with the legitimization of homosexuality as a "hate-filled bigot." Homosexual activists publicly associate this label with violent "gay bashers" and hateful fanatics. When they use the term, they want people to think about the killers of Matthew Shepard (who truthfully wasn't murdered, because of his homosexuality, btw), but in conventional practice they include every man, woman, and child who believes homosexual behavior is abnormal, unhealthy, or wrong. Ask any homosexual advocate to state the difference between homophobia and non-homophobic opposition to homosexual behavior. They will reveal that they accept no opposition as legitimate. (Tolerance is a one-way street for them).

Secondly, the term defines opposition to homosexual behavior as a mental illness. Homosexual activists take special delight in this since it was scant decades ago that homosexuality was listed as a mental disorder in the Diagnostic and Statistical Manual of Psychiatry (the listing was removed by the political maneuvering of homosexual activists in a 1973 vote of the members of the American Psychiatric Association).

Thirdly, the term can be used as the semantic equivalent of "racist," helping the homosexual activist movement to further indoctrinate the public with the notion that opposition to homosexual behavior is equivalent to prejudice against racial minorities.

Collectively, these strategic applications of the word "homophobia" serve to intimidate many opponents into completely silence. When any expression of opposition to homosexuality draws the accusation that one is a mentally-ill bigot equivalent to a racist, few people will venture public opposition.

Society's treatment, acceptance, etc has improved so much over the years, to the extent better than it ever has since the dawn of civilization. There has never been so many people who have falsely believed that homosexuals are "born that way" and can't change, than there is today. And there has never been a civilization in history that considered legalizing same sex "marriage" as it is happening today. Yet the level of distress and/or problems the average identified homosexual experiences, has not decreased, and in many areas has increased.

Therefore, society and "homophobia" are not to blame. The evidence and reality proves that the homosexual activists' definition of the word "homophobia" is a farce and just another one of their tactics to censor people who express concerns and worries about the unhealthiness of homosexual behavior. If the truth was on their side, they wouldn't be making such an effort to shut people up." -Scott Lively

In the very homosexual-friendly location of Sweden/Denmark, a longitudinal research study of over 8000 people (both men and women) who identify as homosexual, live that lifestyle, and were in same sex "marriages," was conducted. It shows that there is a considerably lower lifespan than the average (heterosexual) couple. The average lifespan for female homosexuals (lesbian couples) was is over 30% lower compared to heterosexual married couples...

<http://www.ncbi.nlm.nih.gov/pubmed/19008504>

-----Original Message-----

From: longjeffc1 [REDACTED]

To: [REDACTED]

Cc: [REDACTED]

[REDACTED]
rlindevaldsen <rlindevaldsen@liberty.edu>; [REDACTED]

Sent: Thu, Jun 7, 2012 12:27 pm

Subject: Re: Reminder

This sounds about right as one city here in NC, I think it was Durham, only had 20 couples it was discovered who would actually be affected in their "benefits" upon passage of the Marriage Protection Amendment here.

Also: there must be studies on marriage longevity and effects from overseas where these unions have been in place for some time before here. It would be good to compile these on one website for easy access.

and yet the fiscal analysis claims only 27 people will sign up for free insurance.

-----Original Message-----

From: Linda Harvey [REDACTED]

To: Micah Clark [REDACTED]

Cc: [REDACTED]

[REDACTED] Rena Lindevaldsen <rlindevaldsen@liberty.edu>; [REDACTED]

Sent: Thu, Jun 7, 2012 11:51 am

Subject: Re: Reminder

Micah:

Do you have a link to that article? Sounds very useful

Linda

On 6/7/2012 9:35 AM, Micah Clark wrote:

Along the same lines as Peter's reminder . . . we are fighting a proposed city ordinance in Indianapolis that would give domestic partner benefits (at taxpayer expense) to city employees, even though we have a \$15 million deficit in just the police department alone. The benefits are for either homosexual or heterosexual couples, and yet the fiscal analysis claims only 27 people will sign up for free insurance.

I used this stat in one of my emails:

Widely respected research expert [Larry Bumpass](#), writing in *Demography* Magazine, reports that while sixty percent of couples marrying for the first time today will remain together for life; only ten percent of domestic partnerships last even five years.

Micah

RL01026

On Jun 7, 2012, at 8:20 AM, [americansfortruth](#) [REDACTED]

Jason is right on here. I have been guilty of this--probably out of laziness because the low hanging fruit (pardon the pun) in exposing the "gay health risks" is MSM. I think the instability of lesbian relationships is a huge factor, and we need to tie it in with adoption. Remember Elizabeth Birch, former president of HRC who adopted twins with that Dem power-broker (Hillary Rosen)? They broke up within a few years. The liberals will come back with: "Well lots of straight marriages break up so what's your point?!" So we need to show that there is a heightened risk to children due to all the pathologies that naturally come with homosexual relationships. And then we also should throw in the moral factor that too many of us ignore: we don't want kids to have immoral role models -- adults practicing/celebrating homosexuality -- as the most important people in their lives. -pl
Sent via BlackBerry from T-Mobile

From: Jason Salamone <[REDACTED]>
Date: Thu, 7 Jun 2012 01:57:43 -0400 (EDT)

To: <[REDACTED]>

Cc: [REDACTED]

[REDACTED] <rlindevaldsen@lberty.edu>; [REDACTED]

Subject: Reminder

The promotion of lesbianism was one of the first things used as a tool in the media/Hollywood to normalize and desensitize people to homosexuality, since females are generally nurturing by nature, the ick factor isn't as difficult to break down through to the reprobate side. It's frustrating that our side continues to focus on the sin of homosexuality unevenly away from speaking out against lesbianism as much as male homosexuality. We will never get anywhere if we don't work on restoring the ick factor back to lesbianism as much as the ick factor seems to hold tight on male homosexuality. And there is an subconscious reaction that we are engaging in a double standard when all of our articles and blogs speaking out against homosexuality included "MSM this" and "MSM that," but nothing about WSW (lesbianism). This needs to change. Keep in mind, most people still (wrongly) believe that lesbianism is even medically safer than heterosexual conduct, when that isn't the case, which I have a handful of data on. Lesbianism also manifests in very heavy increase in psychological problems (emotional enmeshment) and holds the record for the highest domestic violence rates of any other type of couple. We need to start getting these truths out to the masses more.

RL01027

From: zeusdesfor@aol.com <zeusdesfor@aol.com>
Sent: Friday, June 5, 2009 8:35 PM
To: Lindevaldsen, Rena M <rlindevaldsen@liberty.edu>
Subject: Re: Miller - Visitation

**REDACTED: ATTORNEY-
CLIENT PRIVILEGE**

[REDACTED]

just found out that Michigan is only 20 minutes from a school in WA that contacted me. only job lead that seems viable so far. am also trying clarke county b/c of the sheriff there- he claims that he won't enforce any VT court order. who knows where God is going to take me. I prefer- personally- to homeschool and stay right where I am. Do you know of anyone who knows Dr. Clam at Liberty on line- the high school program? I could teach there. I am applying for the DLP but it doesn't look promising b/c I can't teach a master's level course with a masters degree and right now that is all that is available. However, the lady I met at the bridal shower two weeks ago happens to be the hiring person and she said to start the process and she might be able to rotate me in and would put me on the list for teaching bachelor's level courses dlp if the program takes off. - love how God works!

I make several calls on Monday to check out starting a homeschool business- and one more lead at another school even though they are not hiring I can complete an application- New Covenant School- b/c I know someone :)

Oh well, today was the last day of school- they worked me in for an 8:30 a.m. check out time on Monday :) ummm.... think they want me gone? I was supposed to check out on tuesday at 9:00 a.m. which means that I would have had to be at school all day monday. LOL!

Got into two rounds with Linda about putting Izzy in a public school and then another round about how I wouldn't put Izzy in daycare for an entire summer so I could work anywhere. Then round three b/c I Told her- God has allowed me to raise her and that I didn't think He wanted that to stop (as opposed to a babysitter raising her and or an b/f and a/s care program so I could work in a public school 45 minutes away!). She just doesn't think in a motherly way.

Oh- I found out Matilda wrote a letter to Campo and he didn't take a stand for what was right.

Oh well, I better go or I could tell you more juicy stuff and that of course would be gossiping- LOL!

Have fun!

RL03676

-----Original Message-----

From: Lindevaldsen, Rena M. <rlindevaldsen@liberty.edu>

To: zeusdesfor@aol.com <zeusdesfor@aol.com>

Sent: Fri, 5 Jun 2009 2:36 pm I could

Subject: FW: Miller - Visitation

[REDACTED]

Rena

From: Gentry, Bonnie M.

Sent: Friday, June 05, 2009 1:31 PM

To: 'srs@sarahstarlaw.com'

Subject: Miller - Visitation

Ms. Star,

Rena Lindevaldsen asked me to send you the following in her absence today:

Lisa is willing to allow visitation in Berryville on Saturday, but due to concerns for the best interests of Isabella, Lisa insists that she supervise the visit, perhaps a lunch with Janet. She is also willing to supervise another visit on Sunday, but must be back at work on Monday.

Please let us know if this is acceptable to your client.

Thank you, Rena

You may respond directly to my email.

Bonnie M. Gentry

Legal Assistant

Liberty Counsel

PO Box 11108

Lynchburg, VA 24506

(434) 592-7000 - Phone

(434) 592-7700 - Fax

www.LC.org

Offices in Florida, Virginia and the District of Columbia

Subscribe to our informative *Liberty Alert* email update at <http://http://www.lc.org/index.cfm?PID=14103>

Support the ministry of Liberty Counsel at <https://donatelinq.net/donate/donate.asp?mid=LibertyC4u>

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

**REDACTED: ATTORNEY-
CLIENT PRIVILEGE**

From: zeusdesfor@aol.com <zeusdesfor@aol.com>

Sent: Thursday, June 25, 2009 11:52 AM

To: Lindevaldsen, Rena M <rlindevaldsen@liberty.edu>; Crampton, Steve <scrampton@liberty.edu>

Subject: Re: I thought

-----Original Message-----

From: Lindevaldsen, Rena M. <rlindevaldsen@liberty.edu>

To: zeusdesfor@aol.com <zeusdesfor@aol.com>; Crampton, Steve <scrampton@liberty.edu>

Sent: Thu, Jun 25, 2009 8:52 am

Subject: RE: I thought

Lisa,

Rena

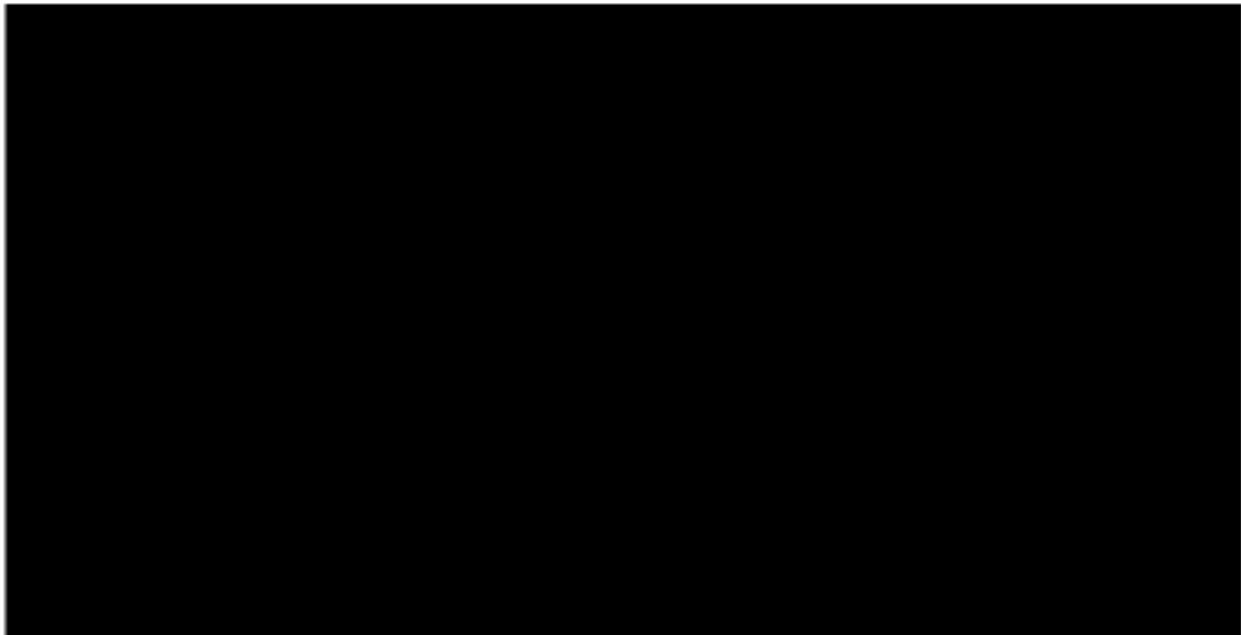
From: zeusdesfor@aol.com [zeusdesfor@aol.com]

Sent: Wednesday, June 24, 2009 5:38 PM

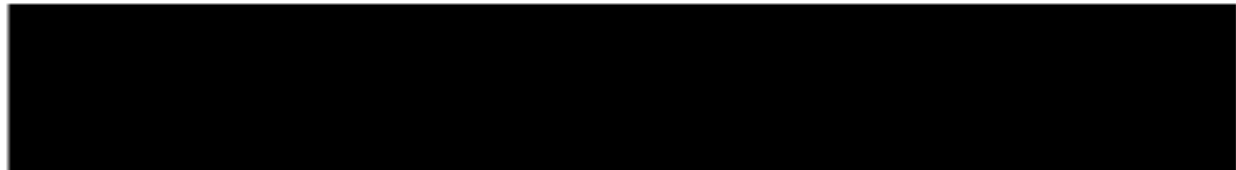
To: Crampton, Steve; Lindevaldsen, Rena M.

Subject: I thought

o.k- so I woke up with "God does not give us a spirit of fear, but of love, power and sound mind". Not sure if you have ever done a word study through the Bible on the words "fear", "power" and "sound mind" but at the beg. of the year I did. It is no surprise to me that this is what I woke up with on my mind this morning- first though no less!



Well, I better go. I am at Panera bread sending out my prayer letter b/c I can't get wireless anywhere and of course my prayer letter is stuck in my computer :) Also, my resume, cover letters etc I have to send to my email address for I am applying to other jobs tonight on my hostess' computer.



Thanks! Lisa

[Huge Savings on Popular Laptops only at Dell.com. Shop Now!](#)

[Shop Popular Dell Laptops now starting at \\$349!](#)

From: zeusdesfor@aol.com <zeusdesfor@aol.com>
Sent: Thursday, June 25, 2009 12:16 PM
To: Lindevaldsen, Rena M <rlindevaldsen@liberty.edu>
Subject: personal prayer

I know you are on vacation- sorry to bother you about something personal. Please pray for me. God has been laying on my heart about how toxic Linda is for me. You already know that Izzy likes her and that is one of the reasons I am still in contact with her. Lately though red flags are more prevalent. I have been trying to distance myself from her b/c she has been speaking poorly of several people who I am friends with. She also refuses to believe that God would be telling me to share my story with others that instead I should be only speaking about the state of my nation and use my legal case to accentuate that fact- she calls it "sounding the trumpet". Her comments are also really starting to bother me- her latest is below which is in reference to the prayer letter I sent out (not that I am looking for positive comments but Linda's is the only one that has been negative). She also is pressuring me to do s! omething I don't want to do and I *refuse* to do it.

So, it is now time I do something about it- on my own. I know Matt helped me with it the last time but since her actions are spilling over in my non-legal case life, so to sepak, I have to do it on my own. Obviously, it is something God wants me to learn (believe it or not I don't like confrontation). I also don't want to hurt her feelings. I know God is using Linda to spread His word. However, God is leading me in another direction and Linda doesn't believe in pure ministry to the homosexual- she would rather tell it like it is and move on.

So, I know you will pray for me. I am going to take some time to pray about it and the book I am reading is very helpful (when to speak up and when to shut up- I told Scott E. that I was reading it and he immediately said- "You need to tell Rena!") b/c it walks you through the Bible and gives numerous examples - I just finished reading about David and Goliath.

Well, that is it. I know that a major part of this is my fault b/c I keep returning to Linda-- answering her phone calls, engaging in conversations, defending my point of view etc. It is hard to break b/c it is how I grew up and she reminds me of my father (argumentative and very opinionated). However, I also know that I broke that cycle with my dad and we now are able to carry on a conversation without me feeling like I am sucked up into it (i think you know what i mean b/c of some of the things you told me about your parents).

that is it- have to go and pick up Izzy. thanks for praying with me :)

-----Original Message-----

From: wall4america@netzero.com <wall4america@netzero.com>
To: zeusdesfor@aol.com
Sent: Thu, Jun 25, 2009 9:04 am
Subject: Re: VA COURT CASE UPDATE FROM LISA MILLER

format is very difficult to read.

Linda Wall

"Does anybody really know what time it is?"

[Buy and sell stock online. Best online broker. Click here.](#)

[Shop Popular Dell Laptops now starting at \\$349!](#)

From: [Philip Zodhiates](#)
To: ["Zodhiates, Victoria Lee"](#)
Subject: URGENT MATTER!
Date: Friday, October 23, 2009 9:26:35 AM
Attachments: [20091023091004379.pdf](#)
Importance: High

Dear Victoria:

Please print this out and deliver it today (including the attached). The lease runs out this month on the townhome and that this request of items to "rescue" from the townhome should happen ASAP. She knows who has the key. There is also someone that can deliver all or some of these items in the next couple of weeks. If it was already packed in suitcases that'd make it much easier for them to transport. We would be happy to meet someone somewhere to pick it up or she can deliver it to you and we can get it from you, although it looks like quite a bit of stuff. You can let us know.

Sister Sarah is doing well.

You can call if you have questions. Tell Cory hello.

Thanks!

I love you,

Daddy

EXHIBIT
6

RUL 1103

Desires ↓

→

* * * very imp to Lydia
 * imp. to me
 - Medical stuff (in Kitchen, under bathroom sink the vitamins.)
 to bring to return or to store

ALL please
 School Supplies (found in Lydia's desk, kitchen + living room)
 Dry erase markers, small white boards, pens, pencils, crayons, index cards, paper, small note pads, gel pen tin (on floor next to desk), erasers, markers + more, plain paper, scissors, tape, contact paper
 - School books (in kitchen)
 1st, 2nd, 3rd, 4th grade books, educational games + computer CDs on shelf in kitchen
 me. Spanish Curriculum
 Answers in Genesis books + other Bible reference books (on top of piano + top shelf of bookcase next to piano + Bible in baskets in L.R.)
 under TV on shelf
 ** - small stuffed black/white cat + larger one on Lydia's bed

- Christian + Classical children books in Lydia's room, on top of bookshelf in my room + in purple container in walk in closet
 - Sarah's + Lydia's sandals (in B.R. closets/near door)
 - Sarah's black + brown shoes (slip on shoes) (in my closet in container of shoes - 2 separate shoes)
 - Under clothes (- top drawers) (strips in clear container in my closet)
 - Pull over + button down sweaters (in both closets)
 - * Blue cover Journal - oversized (I think in L.R. - already written + drawn in - white pages)
 Books for Sarah - few.
 authors: Spurgeon, Trip, Elliot, George, Tazewell, de Moss, O'Martin, biographies (in my room)

*** Return all library books**
 * Return Noah Curriculum (all books have that title on cover) in living room - owners name on inside cover
 store please:
 - photos, albums, scrapbooks
 - legal papers - part of bed in B.R. (including media stuff)
 - Bills etc found in + on coffee table
 - Lydia's treasure box under bed
 - Lydia's Angels (you choose which ones)
 - Computer CD's - bottom drawer of container in L.R. closet
 - all teacher stuff unless someone wants to use it (ro-top shelves, boxes in hall + my room, Lydia's room)
 * Rocking Chair in L.R. (store)
 ** bluish bear/doggy ears stuffed animal - stuffing almost gone in arms (in Lydia's room)
 ** Lydia's comforter set (on bed)
 ** Little hamster animal (I think on bed)
 ** Porcelain dolls + dolls (all)
 ** Jesus You pillowcase
 ** purple hand made doll (her room)
 ** Baby toy box - activity (closet)
 ** Yellow cat (her room)
 My books - store rest please

* * * stuffed black cat - VERY IMPORTANT

From: [Philip Zodhiates](#)
To: ["Zodhiates, Victoria Lee"](#)
Subject: RE: Engagement article
Date: Monday, November 09, 2009 5:05:58 PM

Bummer.

Can you please ask Rena when we can pick up the stuff from the apartment. I need it by this weekend.

Daddy

P.S. Are you feeling well now> Did you go to work?

From: Zodhiates, Victoria Lee [mailto:vlzodhiates@liberty.edu]
Sent: Monday, November 09, 2009 5:01 PM
To: Philip Zodhiates
Subject: RE: Engagement article

I'm sure you'll either get an email or it will be assumed I will tell you, but they are not going to hire me for that position, but they will instead hire the person recommended by the Chancellor in hopes that something else will open up closer to the time that I can start full-time.

Mrs. Tuomala told me that her hands are tied and that the choice is no longer hers, but that Dean Staver did say he wants me to stay and he hopes to find something for me in time.

From: Philip Zodhiates [mailto:philipz@responseunlimited.com]
Sent: Monday, November 09, 2009 4:31 PM
To: Zodhiates, Victoria Lee
Subject: Engagement article

<http://www.newsleader.com/article/20091108/LIFESTYLE1004/911080302/Zodhiates-Hyden>

WE CAN NOT OBEY AN UNJUST LAW!

Dear Friend,

The words above are the solemn message that I, along with other national leaders, declared as the U.S. Supreme Court heard arguments on marriage.

In light of the absurd notion that “marriage is on trial,” I co-drafted a Marriage Pledge and now a broad cross-section of national religious and political leaders representing Evangelicals, Catholics, Orthodox Christians, and Jewish communities have come together to stand in unity. “**We Stand in Solidarity to Defend Marriage**” they declared.

The Marriage Pledge states that “marriage is so fundamental to the natural order and the common good that this is a line we must draw and one we cannot and will not cross.” God designed marriage with one-man and one-woman and Jesus affirmed marriage in Mt. 19:4,5.

An assault on marriage is a direct assault on our Creator and His creation. Like saying a Da Vinci painting is a mistake and painting over it — this assault is as if the created being declares that the Creator made a mistake and the created being knows better than the Creator.

Though we hold the highest respect for the rule of law — we also can not and will not respect an unjust law that directly conflicts with higher law. We pledged to do whatever it takes to defend natural marriage from a massive radical homosexual and legal onslaught.

Never have the stakes been higher. My colleague Dr. James Dobson and I agree that same-sex marriage will fracture the nation. If you weaken or undermine natural marriage — our entire civilization is threatened.

We have a Biblical basis for opposing any law or ruling that is against God’s laws. Daniel and the three Hebrews did not bow to the King’s edict. Moses’ parents disobeyed Pharaoh to obey God. Esther disobeyed the Persian law and approached the King, even though he had not summoned the Queen. The Apostles were told to not preach in the name of Jesus — but they obeyed God rather than man. And our Founding Fathers stood against the unjust laws of the King of England to forge this nation. Benjamin Franklin is reported to have said of the battle to ensue, “*We must indeed all hang together or, most assuredly, we shall all hang separately.*”

I am writing to ask if you will stand with us in defending marriage. I believe that if we do stand together — we can have great impact in this battle. We will fight this battle in the court of public opinion... in the legislatures and Congress... in the courts... and with peaceful resistance if necessary.

I have enclosed the Marriage Pledge and I ask you to read it, and then return the reply card to me stating that you have signed on with me. And I am asking if you will pray for the Supreme Court decision ... and support our efforts.

If this government and Supreme Court attempts to put people of faith “in the back of the bus” simply

EXHIBIT

7

(over, please...)

- 2 -

for our religious beliefs — we will NOT voluntarily walk to the back of the bus! I hope that you feel the same way and will stand with me!

The radical agenda to destroy marriage and trample religious freedom is not some distant future possibility. It is here now and we must stand. We have no other choice.

Christians and people of faith have been demonized and dehumanized. The radical agenda has no respect for human dignity. If you will not promote a sexually immoral union then you are targeted for insults, and punished like the baker who was fined \$135,000 for refusing to bake a cake for a same-sex ceremony.

If the Supreme Court ruling (expected in June), sides with same-sex marriage, such a ruling will trigger a domino affect that will significantly impact people of faith, faith-based businesses; faith-based organizations, including churches, pastors, religious education institutions, adoption ministries, and more.

The president's own lawyer admitted before the Supreme Court that if the Court sides with same-sex marriage, churches may lose their tax-exempt status. "That will be an issue," the Obama attorney said. Radical homosexual groups are already calling for that to happen.

Attacks against people of faith have been increasing as bakers, florists, photographers and others have been viciously attacked, physically threatened, or have had outrageous penalties and fines brought against them by government officials and judges — simply for not bowing to homosexual demands, expressing opinions that don't support homosexuality and standing up for their religious beliefs.

Last year we helped support the group of Houston pastors who were threatened with subpoena by the radical lesbian mayor for simply speaking out against her pro-homosexual transgender ordinance. Another pastor in Massachusetts has been sued by a radical homosexual group simply for speaking out against homosexuality.

We both know that the persecution of Christians in America will only get worse if the Supreme Court is so off base as to side with same-sex marriage. Pastors, leaders, politicians and citizens like you and me will face persecution if we dare to speak out in favor of natural marriage.

The Supreme Court has made disastrously wrong decisions before as in the Dred Scott case ruling that blacks are not citizens and another ruling that led to the "eugenics" movement which was eventually cited by the Nazis as a model for Hitler's genocide. A ruling in favor of so-called same-sex marriage will utterly and completely transform the face of society and will result in the beginning of the end of Western Civilization!

In reality, marriage is not on trial any more than gravity is on trial. Marriage is what marriage is — the union of a man and a woman. What is on trial is the judiciary. If the courts and judges are so blind as to not recognize marriage and so arrogant to think they have the authority to change it, then such rulings deserve no respect. They do not represent the rule of law because they are contrary to the Natural Law.

Marriage predates civil government. It is objectively the union of a man and a woman. It is the foundation of our entire culture, and it must be defended. It is only within the last 11 years or so that this sacred institution has come under attack from activist judges and radical homosexuals.

(continued on next page...)

Same-sex marriage as a policy matter says boys and girls don't need moms and dads — that they are irrelevant. Gender becomes pointless when government adopts same-sex marriage. It says that two moms or two dads is equivalent to a mom and a dad.

Same-sex marriage is the most divisive and culturally destructive issue to face America since the Supreme Court's abortion decision in its 1973 Roe v. Wade decision legalizing abortion. But the difference now is that as horrific as Roe v. Wade has been, that Supreme Court decision did not *force* people to participate in abortion — but a decision legalizing same-sex marriage will *force* citizens to accept it.

And if the line of same-sex marriage is crossed — then the door is opened for polygamy, polyandry and who knows what. Deviants are already pushing for relationships with children.

So if the Court sides with same-sex marriage we cannot recognize the legitimacy of their ruling because it will not be grounded in the Rule of Law. In a peaceful way, we must resist it in every possible way as much as Dr. Martin Luther King resisted unjust laws in his time. Christians and people of faith may well be forced to engage in peaceful acts of civil disobedience to unjust laws and unjust rulings.

That's why I, along with a number of prominent religious leaders, have told the Supreme Court that redefining marriage is a red line that cannot be crossed. We warned them that if they do cross that line, WE CAN NOT AND WILL NOT CROSS THAT LINE. We have no choice. We cannot compromise our religious convictions. If pushed, we must take a stand.

Will you join with our principled resistance to an unjust law by signing the enclosed Pledge in defense of marriage? I also ask if you will pray for the critical Supreme Court ruling to come in a few weeks — and to help support our national campaign to defend marriage.

And as I ask for your support — I promise that you will not ever stand alone in this battle! For those liberty-minded Americans willing to stand with us — you have a promise, a commitment from me that Liberty Counsel will defend you should your religious rights come under assault in the future.

Our Liberty Counsel Team was created for these kinds of attacks, and we will defend those who are considered lawbreakers for merely exercising their religious beliefs and rights. We are already mounting our national campaign in defense of marriage:

Through Liberty Counsel Action, we are alerting and educating tens of thousands of citizens... distributing and gathering thousands of "Defend Marriage Pledges"... contacting and enlisting multiplied thousands of pastors and other leaders who collectively communicate with millions... educating and urging lawmakers to do what they can, legislatively, to protect our rights... and through our legal defense group, Liberty Counsel, giving legal counsel and taking legal action as necessary to defend our religious and speech rights.

And we will be considering pressuring Congress to utilize the Constitution's only remedy for unelected, unaccountable, runaway federal judges who go the wrong way with unjust rulings — which is impeachment and removal from their position.

But I need your help with our efforts to defend marriage and people-of-faith who are being singled out for discrimination and attack by radical homosexuals and their allies!

(over, please...)

- 4 -

As one of our friends and most faithful supporters, I know protecting marriage from the onslaught of radical homosexual activist's agendas and unaccountable judges is important to you. I need you to stand with me and these other leaders to defend natural marriage.

Stand with us as we put everything on the line. We have no choice. We can not celebrate that which is contrary to God and His created order.

My friend, in the heated, socio-political climate of the day, and the fact that it has become open season against Christians and other people-of-faith, we must stand together in defending marriage and our rights. Will you do these 3 important things for me?

(1) Return your signed Pledge card, (2) PRAY for the Supreme Court ruling and for America, (3) Give as generous a gift as possible and help us stand for this critical battle.

Your generous gift will be used for our efforts as we prepare to meet these anticipated challenges on behalf of those being attacked for their faith. And, thanks to a generous supporter of our Liberty Counsel Teams who shares our burden, today your gift of any amount will be doubled as part of a Matching Challenge Grant!

That means a gift of \$25 becomes \$50 for our work, \$50 becomes \$100, \$100 becomes \$200 and so on. Even a gift of \$15 or \$10 will be worth double to us.

I hope that you will do whatever you can because we are in a fight for the very soul of our nation. We must heed the warning of Benjamin Franklin and "stand together" in this battle.

There are many things we can endure, but redefining marriage is so fundamental to the natural order and common good that it is the line we must draw which we will not cross. I pray that you will stand with me and support us on this issue.

Yours with bold sincerity,



Mat Staver, Chairman

P.S. If the Supreme Court issues a ruling in favor of same-sex marriage, it will not only be a direct affront to God's natural created order, but will also open a Pandora's Box of immoral relationships that will collide with religious freedom and lead to our civilizations' downfall.

That is why I and other leaders have boldly told the Supreme Court, "WE CAN NOT CROSS THIS LINE." We have no other choice.

As people of faith, we pledge obedience to our Creator when the State directly conflicts with higher law.

Will you stand with us with your prayers and financial support and by returning your signed "We Stand in Solidarity to Defend Marriage" Pledge? We only have a short time before the Supreme Court issues their ruling. Please let me hear from you as soon as possible.

Subject Line: A special message from Anita Staver

One of the most exciting times in Liberty Counsel's busy year is when we take time to gather with friends and fellow culture warriors for *The Awakening* conference, as we will on Saturday, March 14, 2015, in sunny Orlando. I am not alone in my enthusiasm, as evidenced by the positive reports we get after every one of these very special events.

Incredible! Great! Informative! These are words used by those who have participated in one or more of our special conferences since 2010.

These action-packed gatherings have been hosted by Liberty Counsel as a member of the Freedom Federation, a large network of multiracial, multiethnic, and multigenerational faith-based and policy organizations and their leaders. Each year, *The Awakening* is a unique "God and Country" celebration of a new movement composed of many voices uniting around shared values and echoing across racial, ethnic, and generational lines.

The purpose of these events is to equip, engage, and unite people around shared core values because of increasing threats to our faith and our freedom.

Join us on Saturday, March 14 for this year's inspirational gathering! Each event from year to year has a unique theme. *The Awakening 2015: Rebuilding the Wall* will be a full day featuring topics of great current interest and break-out sessions for everyone. Some of this year's sessions are: Israel and the Middle East; Radical Islam and Western Civilization; The Persecuted Church; America's Culture War; Youth, Voting and Contemporary Worldviews; Families Under Attack; History of Civil Disobedience, and many more.

Confirmed speakers such as Governor Mike Huckabee, Senator Rick Santorum, Janet Boynes, James Robison, Gail McWilliams, Deacon Keith Fournier, Kamal Saleem, Major General Robert Dees, and many more will inform, inspire, and motivate! Go to www.TheAwakeningUSA.org to get tickets as soon as possible – this event will sell out! Or, you can call us at 1-800-671-1776 if you prefer.

Tickets are just \$20 for adults and admission is free for those 18 and under, so this is the perfect opportunity to bring a teen or even an entire youth group to a very special patriotic gathering. One of the favorite aspects of *The Awakening* for attendees is networking with many like-minded patriots and browsing exhibits tailored to their interests.

Each person must have a ticket for admission, so visit www.TheAwakeningUSA.org to register and get more details on this very unique opportunity. You can also view video presentations from the most recent conference on the website. Past speakers have covered subjects ranging from the sanctity of life, marriage and religious liberty, Sharia (Islamic law), ObamaCare, the persecuted church, the economy, immigration, and a myriad of other timely topics. Our subject matter is always relevant, timely, and deeply impactful!

One mother who attended *The Awakening* reported that her pre-teen daughter was so deeply impacted by the experience that she talked non-stop for the two-hour drive home and asked “What can I do to serve God better?” Other comments from past attendees speak for themselves:

* “I LOVED the Awakening! It gave my friend and me a sense of hope and spiritual renewal that one loses in the daily struggle against all of the evil that is surrounding us now.” Joyce W.

* “I cannot begin to tell you how informative it was. The caliber of the speakers was outstanding. What a blessing to have been in attendance!” Jane Y.

Make plans now to attend *The Awakening 2015* and learn more about what you and your family can do to help rebuild this nation into a just and God-fearing society! You will have an opportunity to network with other patriots who are passionate about preserving and advancing our shared values. You must have a ticket for admission -- go to www.TheAwakeningUSA.org to reserve your spot before the event sells out.

We desperately need God in America. We are living in very challenging times for all people, but especially for people of faith. Yet in the midst of increasing pressures on society and the darkening shadow of persecution, we still have a chance to rebuild the foundations of American society – with God, all things are possible!

We can succeed in this high calling if we strategically work together. As Benjamin Franklin famously said in his own challenging time, “We must all hang together, or assuredly we shall all hang separately”! Like Franklin and the other Founders in their generation, we must rebuild our nation’s foundations on godly principles if America is to have a future.

Well, I told you I am excited about this unique and special event! Please ask the Lord if you are supposed to attend – you will be greatly enriched, I promise! **I look forward to seeing you at *The Awakening 2015!***



[Print Page](#)

Adjust Font Size:

Search

Restoring the Culture One Case at a Time by Advancing Religious Freedom, the Sanctity of Human Life and the Traditional Family

[About Us](#)

[Donate](#)

[Online Store](#)

[Press Page](#)

[Contact Us](#)

Liberty Alert

March 19, 2009

Alabama High Court Takes On Out-Of-State Parental Rights Battle

www.LC.org

The Alabama Supreme Court will hear an appeal involving a child caught between two former same-sex partners split between California and Alabama. Liberty Counsel filed the appeal in the case of *N B v A K*, asking the Alabama Supreme Court to take the case. The Alabama Court of Appeals ruled that the state must recognize and enforce a California decision, declaring that a former same-sex partner with no biological or adoptive relationship has parental rights.

The woman represented by Liberty Counsel (who is known as "N.B." in the case) is the biological mother of a nine-year-old girl. At the time of her daughter's birth, she was in a same-sex relationship in California. Well after the relationship ended, the former partner ("A.K.") sued, and a California court declared A.K. a "de facto" parent, granting her visitation rights.

Briefs will be filed with the Court in the next few weeks. Pray for a favorable outcome and that "N.B." will be able to continue to raise her own child without interference from the unrelated woman.

Read our [News Release](#) for more details.

Today On Liberty Live

Our special guest on today's show will be Bob Knight, Senior Fellow at the American Civil Rights Union (the anti-ACLU) and a Senior Writer with Coral Ridge Ministries. Mat Staver will host [Liberty Live](#), from 4-5 p.m. ET (3-4 p.m. CT) and Matt Barber will co-host.

Today's topic is the Freedom to Listen Campaign and Save Radio Free America. Tell your friends to listen and learn how to prevent a return of the "UnFairness" Doctrine.

Every day on [Liberty Live](#) is enlightening and exciting! Yesterday, our callers weighed in on whether or not non-violent civil disobedience is appropriate in today's times. You can also listen to an [archive broadcast](#) of this show.

Watch online from 4 - 5 p.m. ET (3-4 p.m. CT) at www.LC.org and add your comments to our live blog during the show. The number to call to talk to Mat Staver and Matt Barber during the show is (866) 963-2037.

Please help inform as many people as possible by forwarding this Liberty Alert to your entire e-mail list of family and friends, and encourage them to [subscribe](#).

Liberty Counsel does not charge clients for representation, so we depend on individuals, groups and churches who care about advancing religious freedom, the sanctity of human life and the traditional family. Liberty Counsel is recognized by the IRS as a 501 (c)(3) tax-exempt organization that accepts tax-deductible donations. [Donate](#) or order resources from the [Liberty Counsel online store](#).

From: [Mat Staver, Liberty Counsel](#)
To: [Liberty Counsel](#)
Subject: SPLC goes fishing
Date: Monday, January 13, 2020 5:44:14 PM

The Southern Poverty Law Center's legal attack on Liberty Counsel has become unreasonable. Because of the SPLC's extreme "discovery" demands, including materials that are already readily available in court records, our staff attorneys were forced to produce 13,000 pages of legal documents which we delivered last Friday.

That costly, time-consuming and pointless witch-hunt took 200 hours of our precious attorney time.

And, discovery is still ongoing. The SPLC is demanding even more documentation—enough paper to fell a forest.

Add to that depositions in the next two-months in which SPLC attorneys will continue to waste time.

It's a fishing expedition and a colossal waste of time.

But the SPLC has a venomous agenda—they've said it themselves. I share more about it below. –Mat

LIBERTY,

Speaking to a friendly crowd, the SPLC's Mark Potok unveiled the radical Southern Poverty Law Center's hidden agenda.

"Sometimes the press will describe us as monitoring hate crimes and so on," said Potok, who at the time served as an SPLC spokesman and editor.

But the SPLC is much more than just a so-called watchdog on hate, insisted Potok in remarks caught on video.

"I want to say plainly that our aim in life is to destroy these groups," Potok said, referring to the SPLC's ideological enemies. ". . . To completely destroy them."

And that's what the SPLC is now trying to do to Liberty Counsel.

In 2017, the SPLC added both Liberty Counsel and me, personally, to a massive ongoing lawsuit filed in Vermont. The SPLC's goal was clear — to destroy Liberty Counsel by tying us up in court and gaining a judgment against us that could cripple and incapacitate this ministry.

I was dismissed from the case, but Liberty Counsel was not. That wasn't enough for the SPLC. So, in 2018, they filed yet another lawsuit, naming both me and Liberty Counsel — this time in Virginia. They wanted to take this ministry down while also destroying my reputation as an attorney.

Of course, our legal team fought back in both states. And last year, a federal

judge in Virginia tossed out the SPLC's Virginia lawsuit. But the one in Vermont is ongoing. And it is extremely costly and time-consuming.

Your generous support now will help us fight this battle. The SPLC has a huge legal war chest—its endowment is nearly half a billion dollars. [Will you help us take on this radical and ruthless giant with a gift now?](#)

MY GIFT TO DEFEND FREEDOM

The Vermont litigation is designed to harass Liberty Counsel and waste our time.

Liberty Counsel has not done anything wrong. But this is a time-consuming lawsuit in which the SPLC is making outrageous allegations and conducting invasive and far-reaching "discovery" demands.

The 200 hours in attorney time it took to produce those 13,000 pages of documentation just scratches the surface. As of late last year, Liberty Counsel attorneys had already spent 3,500 hours fighting the SPLC's malicious attack!

+ + Groundless allegations intended to destroy ...

The particulars of this Vermont case reveal the depths to which the SPLC and the LGBT community will go to attack us.

The suit involves a child custody battle between a lesbian and her former partner who later became a Christian and left the homosexual lifestyle. In 2017, five to six years after the lawsuit was filed, the SPLC became co-counsel. One of their first actions on behalf of their client, Janet Jenkins, was to add Liberty Counsel to the list of defendants.

While we were representing Lisa Miller and her young daughter Isabella, the two suddenly disappeared in September 2009. We had no knowledge of her plan to run, and no knowledge of where she went. We have had no communication with her since she left.

But the SPLC alleges we must have been part of helping her escape the jurisdiction of the courts. Of course, this is a lie.

This attack is part of a broader agenda by the SPLC and other radical groups seeking to destroy their opposition through lies and intimidation.

+ + Picking Us Off One by One...

Having inflicted economic damage on Liberty Counsel and others through a

number of fraudulent tactics, the SPLC is taking its attack on us to a new level through this lawsuit and the way in which they are managing it.

That's why I'm turning to friends like you to help me fight back and win against the SPLC at this critical time!

MY GIFT TO DEFEND FREEDOM

This mammoth battle is just one of more than a hundred cases and issues we're actively engaged in right now.

We're going head-to-head against the LGBT movement in many states. We're aggressively fighting laws which keep counselors from giving teens the help they want from unwanted same-sex attractions.

In two weeks, I will be in Atlanta to challenge these unconstitutional counseling bans before the 11th U.S. Circuit Court of Appeals.

And, of course, we're deeply engaged in battling Planned Parenthood and California's pro-Planned Parenthood attorney general in defense of Sandra Merritt.

All these battles consume countless hours of legal work. But I must commit all the necessary resources to defend freedom. And to ensure that radical LGBT activists do not succeed in their mission to discredit or damage Liberty Counsel.

Thank you for your prayers. And thanks in advance for partnering with Liberty Counsel at this critical time!

For faith and liberty,



Mat Staver,
Founder and Chairman
Liberty Counsel

P.S. The SPLC's legal attack against us is ramping up—with outrageous discovery requests and time-consuming depositions just ahead.

I need your help to ensure that we can dedicate all the necessary resources to defeat the SPLC's lawsuit against us and continue other vital efforts.

MY GIFT TO DEFEND FREEDOM

This message can be viewed on our homepage.

+ +

©1995-present, Liberty Counsel, with offices in Florida, Virginia and Washington, D.C., is a nonprofit litigation, education, and policy organization dedicated to advancing religious freedom, the sanctity of human life, and the family. [Privacy Policy](#).

Liberty Counsel
PO Box 540774
Orlando, FL 32854
407-875-1776



[Forward To Friend](#)

To ensure that this newsletter is delivered to your inbox, add alert@libertyaction.org to your address book.

To unsubscribe from this list, click [here](#).

If this message was forwarded to you, you can subscribe to this list [here](#).



From Anita Staver, President

The “Freedom of Choice Act” Isn’t Free and Offers No Choice



A people without understanding will come to ruin. — Hosea 4:14

When Barack Obama became President on January 20, he made history. His election has conclusively proven that anyone from any background can succeed in America. He has shown that today’s American voters care less about a politician’s skin color than they do about his message. Those are clearly positive lessons that are undeniably good for this country.

If Mr. Obama’s presidency was just about those excellent lessons, we could all sit back, relax and be happy about the “change.” But our new President has just begun making history.

Tragically, he has declared unswerving support for some of the most radical anti-life laws this Nation has ever seen, and he can be expected to begin acting

on these misguided convictions.

In fact, all of the gains we have made for the sanctity of human life in the last 36 years – ever since the infamous *Roe v. Wade* decision was handed down – may soon disappear with the stroke of his pen.

President Obama is an ardent supporter of the so-called “Freedom of Choice Act” (FOCA) which will remove every reasonable limit on abortion. *But FOCA isn’t free and it isn’t about choice.* If this law is passed (and it may already be in effect by the time you read this article, given the high priority Mr. Obama gave it while campaigning), you and I will be *forced* to pay for abortions. *So much for freedom.*

Further, pregnant women who are confused about their options will be denied the information they need to make informed decisions, and counsel for life-affirming decisions will be severely restricted. *So much for choice.*

Whether you’re talking about parental notification laws, restrictions on late-term abortions such as the gruesome “partial-birth” procedure, laws requiring waiting periods, informed consent, sonograms, regulations prohibiting our tax dollars from funding abortions, conscience clauses for pharmacists and medical personnel, or laws allowing doctors to refuse to perform abortions – under President Obama’s plan, they will all be history.

Under FOCA, pro-life pregnancy centers that provide information on abortion alternatives and adoption will be regulated out of existence.

States will be unable to print “Choose Life” license plates that have helped fund such centers. Pro-life sidewalk counselors will no longer receive police protection from harassment by abortion clinic workers or radical anti-life activists.

Even human cloning will likely be allowed, because FOCA forbids the government from stopping a woman from choosing to bear a child. If the only way she can have a child is by using cloned embryos – that will be

All of the gains we have made for the sanctity of human life in the last 36 years may soon disappear with a stroke of Mr. Obama’s pen.

her unchallengeable “choice.”

Any and all federal, state or local laws that regulate or restrict abortion will be gone. This hideous law even allows an individual to sue the government for “discrimination” if they feel they’ve been denied their uncontestable “right” to abortion!

If you’re like most people, you’re asking yourself, “What are we to do in such an evil day?” Should we throw our hands in the air, waive a white flag, and accept unrestricted

(...continued on page 3)



Restoring the Culture by Advancing Religious Freedom, the Sanctity of Human Life and the Traditional Family

The Liberator newsletter is regularly published by

Liberty Counsel

PO Box 540774

Orlando, FL 32854-0774

800•671•1776

www.LC.org • liberty@LC.org



The Liberator

VOL 20,
NO. 2

LIBERTY COUNSEL'S MONTHLY ACTION/ALERT NEWSLETTER
"Where the Spirit of the Lord is, there is Liberty." 2 Cor 3:17

FEBRUARY
2009

Liberty Live on American Family Radio Network **LIBERTY COUNSEL LAUNCHES NEW TALK RADIO PROGRAM**

Mat Staver, Founder of Liberty Counsel and Dean of the Liberty University School of Law, has begun hosting *Liberty Live*, a daily radio program that launched on Monday, January 19, on over 137 stations in American Family Radio's new AFR Talk Network. Joining Staver as co-host is Matt Barber, Director of Cultural Affairs at Liberty Counsel and Associate Dean for Career and Professional Development at the law school.

The one-hour live call-in program airs at 4:00 p.m. ET (3:00 CT) Monday through Friday and features leading political and religious leaders discussing topics of cultural and political interest. *Liberty Live* also encourages America's Christian and conservative citizens to make their collective voices heard in the national public policy arena.

Sarah Seitz, Legal Director for the Liberty Center for Law & Policy in Washington, D.C., is providing a weekly update on public policy matters live from the Nation's capital. Each program brings a fresh analysis of the latest news from a Christian viewpoint, with an open line forum and an interactive blog. The program

will also simulcast at AFR.net and is available for podcast.

There is already talk of expanding the reach of the program through interested cable networks, many more radio stations and networks, and even one of the leading TV/radio satellite networks. From the very first broadcast, the programs have enjoyed an

excellent response with more callers queued up for comment than the show's one-hour format allows. Considering the large number of requests for the daily "Fact Sheet" offered on the program, listenership to the fast-moving, fact-filled program is building quickly.

(...continued on page 3)



Liberty Live is on the air! The product of a powerful new collaboration with American Family Radio Network, Liberty Counsel has teamed up with Liberty University and Liberty Alliance Action to produce the daily one-hour live call-in program. Pictured at the top left are the program's host, Mat Staver, and his co-host, Matt Barber, with a special first week guest, Liberty University Chancellor Jerry Falwell, Jr. Liberty Live immediately precedes Michael Reagan's popular show, making for a rock-solid conservative talk "drive time" for AFR Talk's line-up. Anyone can receive a special Liberty Live "Fact Sheet" covering the important current issues the show is highlighting by calling 1-888-882-1776, or visiting LibertyLiveRadio.org on the Internet.

Photos by Chr stopher Ryan Breed ove



From Mat Staver, Founder and Chairman

Will Traditional Marriage Go Up In Smoke? NOT ON MY WATCH!

The new Pelosi/Reid/Obama axis of political power has placed the federal Defense of Marriage Act (DOMA) in the crosshairs of its “first 100 days” agenda. If they succeed in repealing DOMA, marriage as we know it will be destroyed.

“Not On My Watch” is my motto for 2009. President Barack Obama promised during his campaign that he would repeal the federal Defense of Marriage Act. For the first time since the Democrat Party Platform passed in 1996, Mr. Obama modified it to codify his intention to repeal DOMA.

DOMA is the dam that holds back the floodwaters of same-sex marriage from pouring across the borders of each of the sovereign states. If DOMA is repealed, within a short time same-sex marriage will run like a raging torrent throughout the states.

DOMA allows each state to reject same-sex marriage. Thirty states have passed state constitutional amendments defining marriage as being between one man and one woman. In addition, a total of forty-six states have either constitutional amendments or express statutory laws affirming traditional marriage and prohibiting same-sex marriage. If DOMA did not

exist, for example, the single state of Massachusetts would be able to override all of these laws, thus subverting the will of the people throughout the Nation by redefining marriage.

Make no mistake: Same-sex marriage will destroy our country. Children need moms and dads. Same-sex marriage permanently deprives children of either a mother or a father and distorts a child’s view of the absent gender. There are severe consequences when a child is deprived of a mom or a dad – and even worse consequences when the child’s view of either gender becomes perverted.

Ask any male incarcerated for violent crime what kind of relationship he had with his father. Almost invariably, the response will be that his dad was not involved in his life. In every measurable category – whether education, mental or physical health, interpersonal relationships, addiction to drugs or alcohol, sexual activity, or crime – children raised without a father and a mother are at higher risk of experiencing destructive behaviors and damaging consequences.

Each day our client, Lisa Miller, and her six-and-a-half-year-old daughter, Isabella, remind me of the consequences of laws authorizing same-sex unions. In January we were in court in both Virginia and Vermont regarding a Vermont order arising from a same-sex civil union law that has recognized Janet Jenkins as a parent to Lisa’s own biological child.

The Vermont court order also requires visitation. I can’t begin to tell you the emotional consequences that have already impacted Lisa and Isabella, after the Vermont court forced Lisa to allow Isabella to visit Janet. On a recent visit, we learned that Janet read the radical homosexual book entitled “Heather Has Two Mommies” to Isabella.

Little Isabella, who is a bubbly, blonde-haired Christian child, has suffered intense emotional consequences. She began to wet her bed, experience nightmares, and suffer the

There are severe consequences when a child is deprived of a mom or a dad – and even worse consequences when the child’s view of either gender becomes perverted.

torment of fearing that her mother, Lisa, will be taken from her. Janet telling her that she has two mommies greatly confused her. Even though Isabella protested, Janet insisted that she was also her mom.

Although Lisa became a

Christian, left the homosexual lifestyle, and is a wonderful mother who led her daughter to the Lord, Janet is trying to use the same-sex civil union law in Vermont to take little Isabella from her. Janet wants her to be raised in an activist, lesbian household, making little Isabella into a “trophy” of the homosexual agenda.

The personal life of Janet’s attorney in Virginia illustrates the destructiveness of the homosexual lifestyle. This lawyer was recently indicted for obstructing justice and tampering with a crime scene regarding a murder that took place in his own home!

He had an ongoing homosexual relationship with two other males who shared his residence. He invited a fourth heterosexual male, whom he had met in college, to stay at his house one night. The police affidavit details how this visitor was injected with drugs to paralyze him before he was sexually assaulted and then stabbed several times.

In order to cover up the crime, the body of the victim was carefully washed and neatly placed in a bed. Unspeakable paraphernalia were found in the household, items that would be used to torture and cause pain as part of sexual acts. Same-sex unions are destructive, and this case is Exhibit A.

“Not On My Watch” will President Obama or the 111th Congress repeal DOMA. “Not On My Watch” will marriage go up in smoke. *“Not On My Watch” must be our motto!*

Liberty Counsel needs your prayers and financial support to ensure that our generation does not lose the battle for traditional marriage. Let it never be said by our children or grandchildren that we could have defended marriage and the family but did nothing. We can and we must win this battle! 🇺🇸



Prayer Requests

❑ Please pray for President Barack Obama in accordance with 1 Timothy 2:1-3. Please also lift up all Americans in governmental authority, especially our newly seated administrators and members of congress. Please also keep the brave men and women serving in our armed forces in continual prayer.

❑ Please continue to pray for our efforts on behalf of Lisa Miller and her precious daughter, Isabella, as their case reaches a crucial new juncture. Please join us in thanking God for the many ways in which He has blessed the Millers and has brought them comfort during their arduous experience in the court system.

❑ Please pray for the new *Liberty Live* radio program as it is broadcast over the American Family Radio Network (AFR) each weekday. Pray for the Liberty Counsel communications staff and their AFR counterparts, as well as the many electronic and Internet technicians who are required to support this powerful new outreach.

❑ Please pray for renewed strength for Liberty Counsel’s staff and attorneys as they meet the extraordinary attacks on our God-given liberties that have arisen from the ultraliberal 111th Congress and the Obama Administration. Pray that the social issues in the “First 100 Days” White House Agenda would be modified to better reflect the interests of all Americans and not just pander to the positions of liberal activists.

(continued from back page...)

abortion as a permanent part of our culture’s landscape?

No! Not now... not ever! Rather, we must follow the example of total resolve shown by the prophet Elisha in I Kings 19. When Elisha received God’s call on his life, he stopped plowing his field and roasted his oxen over a bonfire made from his farm equipment! He unhesitatingly left his “normal” life and honored God’s direction to follow Elijah the prophet.

Elisha’s resolve to do God’s will was unshakable! He was determined to never turn back from what God had directed him to do. Faced with the evil of unrestricted, government-sanctioned abortion in America, we must be just as committed in our day as Elisha was in his.

Join Liberty Counsel as we aggressively fight for life, regardless of new challenges like the outrageously misnamed “Freedom of Choice Act.” We must join together in one voice and send President Obama and Congress a message. *FOCA isn’t the change America needs.* 🇺🇸

(continued from front page...)

In its first week debut, some of the guests on *Liberty Live* included: Congressmen Trent Franks (R-AZ) and Greg Walden (R-OR) talking about abortion and the Fairness Doctrine, Jerry Falwell, Jr., who spoke about the future of the conservative movement and Liberty University, Jill Stanek, a nurse who blew the whistle on late term abortions at a Chicago hospital which led to the passage of the “Born Alive Infant Protection Act,” Brandi Lozier, who survived a late term saline abortion, Tim Echols, Founder and President of TeenPact, Steve Kendrick, writer and producer of “Fireproof” and “Facing the Giants,” and Lisa Miller, whom Liberty Counsel is defending in a national conflict over same-sex civil unions.” 🇺🇸

Mat Staver is Weekend Guest on "Huckabee" Show to Discuss the Obama Administration's Liberal Social Policies

Jan 23, 2009

www.LC.org

Mat Staver is a scheduled guest on "[Huckabee](#)" this weekend to discuss how quickly the new administration has launched its liberal social policies. In just a few minutes after the inauguration, whitehouse.gov unveiled Obama's agenda that includes radical anti-life, anti-marriage plans. You can watch "Huckabee" at 8 p.m. Saturday and 11 p.m. and again at 2 a.m. (ET) on Sunday on the Fox News Channel.

Obama to Allow Federal Funding for Overseas Abortions

The Associated Press reported this morning that an administration official says that President Obama will sign an executive order today lifting a ban on federal funding for groups that help provide abortions overseas.

Today on Liberty Live

We have had an action-packed week with our new radio/internet program and it isn't over yet. [Lisa Miller](#) will be in the studio today to talk about the legal battle in Vermont and Virginia to keep her daughter Isabella from being raised by an unrelated lesbian.

Stephen Kendrick, producer and writer of [Fireproof](#), will also join the program by telephone to discuss this terrific pro-marriage movie that is being released on DVD this month.

Yesterday on Liberty Live we commemorated the 36th anniversary of *Roe v. Wade*. Late-term abortion survivor Brandi Lozier shared her amazing story. We also had two congressmen on the show: Greg Walden of Oregon, who talked about the "Fairness" Doctrine, and Trent Franks of Arizona on the future of conservatism and the current administration.

Don't miss a day of [Liberty Live](#). Watch online from 4 - 5 p.m. ET (3-4 p.m. CT) at www.LC.org and add your comments to our live blog during the show. The number to call to talk to our guests during the show is (866) 963-2037. Mat Staver hosts *Liberty Live* and is joined by co-host Matt Barber.

University Reverses Policy and Allows Religious Clubs to Base Decisions on Religion

Gator Christian Life a religious student group at the University of Florida, lost its status as a registered student organization last fall when it refused to include the University's anti-discrimination policy in its constitution. The University policy

prohibited religious groups from discrimination on the basis of religion. The University has now reversed its position, posted an announcement of the policy change on its web site, and sent a letter to the student group confirming the new policy and inviting it to register as a student organization again.

Read our [News Release](#) for more details.

Please help inform as many people as possible by forwarding this Liberty Alert to your entire e-mail list of family and friends, and encourage them to [subscribe](#).

Liberty Counsel does not charge clients for representation, so we depend on individuals, groups and churches who care about advancing religious freedom, the sanctity of human life and the traditional family. Liberty Counsel is recognized by the IRS as a 501(c)(3) tax-exempt organization that accepts tax-deductible donations. [Donate](#) or order resources from the [Liberty Counsel online store](#).

TAKE ACTION



Share on Facebook



Tweet This Article

Post Office Box 540774

Orlando, FL 32854

(407) 875-1776

Email: Liberty@LC.org

ABOUT

About Liberty Counsel

Contact Us

Leadership

Job Openings

RELIGIOUS FREEDOM

Christmas & Religious
Celebrations

Church & Nonprofit Political
Activity

Employment Discrimination

Human Trafficking & Rights

Liberty Prayer Network

Religion in Schools

FAMILY

Day of Purity

Marriage & the Family

Same-Sex Issues

OTHER

Census

Declaration of American Values

“ObamaCare”

THE SANCTITY OF HUMAN LIFE

Abortion

Cloning

Liberty Relief International

LINKS

Press Releases

Podcast

Published Cases

SIGN UP TO STAY INFORMED!

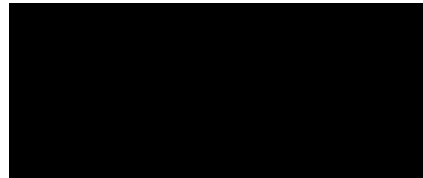
View our [Privacy Policy](#).

©Copyright 1995 - present. All Rights Reserved.

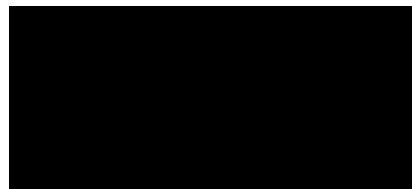
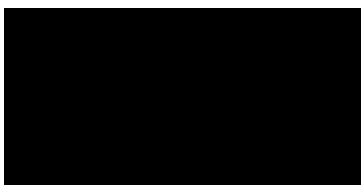
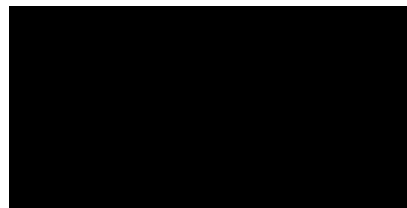
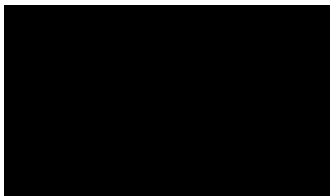
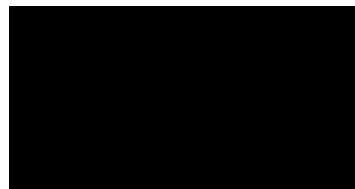
Powered by **Site Stacker**, Design by **WMtek**



**REDACTED: PRIVILEGE
NON RELEVANT BUSINESS INFO; TRADE SECRETS;
PROPRIETARY INFO.
FIRST AMENDMENT PRIV.**



Lisa Miller
Forest, VA



*

From: zeusdesfor@aol.com
Sent: Thursday, February 05, 2009 3:58 PM
To: Crampton, Steve
Subject: Re: Proposed Order

[REDACTED]

REDACTED: ATTORNEY-CLIENT PRIVILEGE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

-----Original Message-----

From: Crampton, Steve <scrampton@liberty.edu>
To: 'Sarah Star' <srs@sarahstarlaw.com>
Cc: 'Michelle Kenny' <mkenny@kenlanlaw.com>
Sent: Thu, 5 Feb 2009 3:15 pm
Subject: RE: Proposed Order

Sarah,

First, let me thank you for your efforts to try to work things out. I appreciate it very much. Second, as to the make-up day and efforts to reach a compromise, if we cannot come to an agreement we will file a motion and formal objection to the proposed order: It is simply unacceptable, in my opinion, for Isabella to be forced to miss a school day in order to comply with the visitation order, and I do not believe Judge Cohen intended such a consequence. Further, the offer from Janet was to get anot her

three days in exchange for one day missed, which Lisa was not willing to give. So I guess it goes both ways here, too.

For what it is worth, I think our motion would seek a modification of the March visitation terms from the 9:00 a.m. drop off time to 1:00 p.m., and from the 5:00 p.m. drop off time to 1:00 p.m.; and a modification of the May visitation terms from a 5:00 p.m. pick up time to 3:00.

As for the bridal shower, thank you for the invitation, but as I understand it, Isabella did not ask to be allowed to attend, but only whether Janet intended to take her there; she does not want to go under these circumstances.

Moreover, regarding the communications between the parties, let me state for the record that while it is understandable that you would believe your client over Lisa, I resent and unequivocally deny that Lisa is "misrepresenting things that Janet has said to her." I think it is absurd to suggest that Lisa simply made up the idea that they had reached an agreement, and that it is far more likely that Janet actually did agree when speaking with Lisa, and only after reflecting on the matter reconsidered and withdrew her agreement. Whatever was actually said, I agree with you that until trust is built *on both sides*, the telephonic communications will remain a problem. Nevertheless, they should (and must, under the court order) continue.

Regarding video conferencing: Lisa is agreeable, and would like to insure that before she purchases expensive equipment, Janet is on the record as agreeing to acquire the technology on her end necessary to make it happen.

I guess I am not clear as to what specifically you would like from Lisa regarding the two visiting days. Are you just wanting dates?

--Steve

P.S. We also resent your suggestion that the only way Lisa will comply is if the order is registered for enforcement in Virginia.

Stephen M. Crampton, Esq.

Vice President for Legal Affairs and General Counsel

Liberty Counsel

1-800-671-1776

Offices in Florida, Virginia and the District of Columbia

Licensed in Mississippi, Tennessee and Texas

www.LC.org • scrampton@LC.org

Subscribe to our informative *Liberty Alert* email update

[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: Sarah Star [<mailto:srs@sarahstarlaw.com>]

Sent: Thursday, February 05, 2009 11:41 AM

To: Crampton, Steve

Cc: 'Michelle Kenny'

Subject: Proposed Order

Dear Steve and Michelle,

LC28971

I am afraid that we are moving backwards with respect to our negotiations. Janet will not (and should not) give up more parent child contact in exchange for one make-up day. Moreover, she does not feel that transportation convenience can be exchanged for quality time with her daughter. She was willing to rearrange things for one day so that Isabella did not need to miss school, but given how much contact has already been missed, she feels that the quality time is more important than one missed school day. Hence, I think it is best to just stay with the order as stated.

Isabella is still welcome to attend the bridal shower if Lisa will allow it. She did express a desire to attend, and I am sure that the Jenkins' could arrange transportation.

Janet vehemently denies that she reached any sort of alternative agreement with Lisa regarding visitation for March. She did say that she would consider it, and she did. If you all recall, this is the same claim that Lisa made regarding Thanksgiving – that after court, Janet agreed to less time than she was entitled to. If communication is to be encouraged, it does not help things for Lisa to (now twice) misrepresent things that Janet has said to her. Communication will continue to be an ongoing problem if the trust problem continues. This is why I suggest starting communication again through email, and eventually trust can be rebuilt and communication can flow more easily. That being said, I did instruct Janet to return Lisa's call, and she informed that she did and left a message. I am not sure if the two have actually spoken yet.

As for the visiting days in the summer, I have not received a response or counter-proposal. I have also not heard anything back about the video-conference capabilities that Lisa has. Janet is not going to invest in a camera adapter until she knows that Lisa is willing to as well, because it won't work if both people don't have the right equipment.

If I don't hear anything back regarding the above matters by the end of the week, I am going to go ahead and submit the proposed order without any summer visit days or make up days included. I need to get the order going so we can get it registered in Virginia in a timely manner, especially because Lisa is pretty clear that she will not abide by an order unless it is capable of being immediately enforced in Virginia. Hence, while it would be great to work out the best possible schedule, the overriding importance of registering the order takes precedence for me.

After five years of litigation, I wonder how much can actually be agreed upon between the parties with regard to make up time etc. I have been willing to try, but please be aware that I am a busy solo practitioner, and do not have unlimited time to negotiate make up time and alternative visitations. Hence, at this time, I am very inclined to simply advise Janet, that until there is a level of trust built up between she and Lisa again such that they can negotiate/communicate between themselves in the best interests of Isabella, that the order simply needs to be followed verbatim. I strongly believe that the only way this trust is going to be rebuilt is for Lisa to show, at the very least, that she can and will comply with the court order.

If you would like to discuss further, perhaps the three of us can arrange a phone conference.

Thanks,

Sarah

Sarah R. Star, Esq.
Attorney and Counselor at Law
P.O. Box 106
Middlebury, Vermont 05753
Ph: (802)385-1023
Fax: (802) 419-3600

This email message and any attachments are intended only for the use of the addressee named above and may contain information that is privileged and confidential. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you received this message in error, please immediately notify the sender by replying to this email message or by telephone. Thank you.

**REDACTED: NON-RELEVANT
CONFIDENTIAL AND
PROPRIETARY INFORMATION;
FIRST AMENDMENT PRIVILEGE**

From: [Tedeschi, Janie](#)
To: [Mihet, Horatio](#); [Gentry, Bonnie M.](#)
Subject: Inquiry about SR Case
Date: Friday, November 20, 2009 10:45:47 AM

Hi Harry,

██████████ called wanting information on SR Case in order to build a prayer base around the intervention. He says he has been speaking with ██████████ (██████████ was the pastor who called asking about the dates of the next court appearance.) I will send him to ██████████ but he was looking for something specifically from LC. Let me know if you have something else I should send to him.

Ken ██████████

863 ██████████

Ken ██████████

Janie Tedeschi
Administrative Assistant
Liberty Counsel

PO Box 540774

Orlando, FL 32854

(800) 671-1776 – Phone

(407) 875-0770 – Fax

www.LC.org

Offices in Florida, Virginia and the District of Columbia

Subscribe to our informative Liberty Alert email update at <http://www.lc.org/index.cfm?PID=14103>

Support the ministry of Liberty Counsel at <https://donateling.net/donate/donate.asp?mid=LibertyC4u>

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: [Mcalister, Mary E.](#)
To: [Corry, David M.](#); [Reichel, Hannah](#); [Staver, Mathew \(Liberty Counsel\)](#); [Staver, Anita L.](#); [Erik Stanley](#); [Belinda Wetherington](#)
Subject: Eml - Mary's comment RE: What do you say when God's law conflicts with man's law?..
Date: Tuesday, January 23, 2007 6:29:48 PM

All I can say is Amen Brother. I could not have said it nearly as articulately, particularly at the end of the day.

Mary E. McAlister
Senior Litigation Counsel
Licensed in California and Florida

Liberty Counsel

PO Box 11108

Lynchburg, VA 24506

(434) 592-7000 - Phone

(434) 582-7700 - Fax

www.LC.org

Offices in Florida, Virginia and the District of Columbia

Subscribe to our informative *Liberty Alert* email update at

<http://www.lc.org/libertyalert/lasubscribe.html>

[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: Corry, David M.
Sent: Tuesday, January 23, 2007 6:23 PM
To: Reichel, Hannah; Staver, Mathew (Liberty Counsel); Staver, Anita L.; Erik Stanley; Mcalister, Mary E.; Belinda Wetherington
Subject: RE: What do you say when God's law conflicts with man's law?...

As Christian lawyers, we work within the law and the courts to advance religious liberties and use the law as a fulcrum for the advancement of the Kingdom of God. When the task before us does not provide an opportunity to do either, we are not shirking any responsibility to decline the representation. Sometimes the law is firmly set in a jurisdiction and taking the case will not afford an opportunity to change it (thus potentially wasting limited resources that could be used in a more fruitful endeavor). In those cases, litigating to an unsuccessful end (for the principle) can actually have the effect of adding to the unfavorable reported precedents, making it more difficult to get a positive result elsewhere. We would prefer to fight the battles in other jurisdictions where the law is not yet set, in hopes of getting reported opinions that conflict with the jurisdictions where the law is firmly set, setting up a battle for final interpretation by the Supreme Court.

Regarding [REDACTED]'s cause, we understand her position but, [REDACTED]
[REDACTED]

When God's law absolutely conflicts with man's law, follow God's law. When God's instructions to you

LC36354

of counsel. Neither of those propositions compels me to represent a woman who

There are three God-ordained institutions: The Church, The Government and The Family. When government leaders establish laws that steer individuals away from obedience to God, they bear responsibility for the result. I'm not sure, theologically, whether the individual citizens are thereby exempt (its been well argued both ways), but certainly leadership in the family, the church and government has a heavy price when leading others astray. God requires us to be obedient to government and laws of government except where those can not be harmonized with with his law or his calling. According, I told

So, she must do what she is called to do and suffer whatever the costs of obedience are. Paul, Peter and John did and they spoke to the tribunals without aid of counsel. I think I recall that Paul and Peter were executed (or at least died in prison) for their witnessing. While I do not believe that would happen in the United States, God may have a big test or trial of faith in front of . That is a separate matter from whether Liberty Counsel must (or should) provide her legal representation through that test and trial.

We do advocate for Christians who take actions that are against the law **when the law provides a means for success** (i.e. the law is unconstitutional as an impermissible burden on the free exercise of religion). When the law will not provide any aid or cannot provide any aid, I cannot see the reason for undertaking the legal representation. They can lose without our help and without utilizing the finite resources of Liberty Counsel.

This response is more of a philosophical one with my extemporaneous thoughts at the close of a long day, not for distribution to Ms. or outside Liberty Counsel. Others undoubtedly see it differently. Nevertheless, I thought the issue merited some thoughtful reply. Especially since I was the attorney who had the last conversation with Ms. .

David M. Corry, Esq.

Senior Litigation Counsel

Liberty Counsel

Offices in Florida, Virginia and the District of Columbia

(800) 671-1776

www.LC.org

Licensed in Florida

Subscribe to our informative *Liberty Alert* email update at

<http://www.lc.org/libertyalert/lasubscribe.html>

[Support the ministry of Liberty Counsel](#)

This message (and any attached files) is intended for the person to whom it is addressed and may contain confidential information. If you are not the intended recipient, please notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors or omissions herein that result from email transmission. Any views or opinions expressed in this email are solely those of the author and do not necessarily represent those of Liberty Counsel.

From: Reichel, Hannah

Sent: Tuesday, January 23, 2007 5:35 PM

LC36355

Belinda Wetherington

Subject: What do you say when God's law conflicts with man's law?...

█ wants to know why Christian attorneys don't advocate Christians standing up for their faith EVEN IF IT'S AGAINST THE LAW. She wanted to talk about this with someone higher up, and decided to write a letter instead. (I think she will be addressing it to Mat.)

We declined representation for her in the past █
█
█

I'm sending all of you this message because 1) the letter is on the way and 2) I think it's an interesting question!

In defense of obeying the law, I think of verses like, Romans 13:1 Let every soul be subject to the governing authorities. For there is no authority except from God, and the authorities that exist are appointed by God." (She said █)

There is also I Pet 2:13-17 "Therefore submit yourselves to every ordinance of man for the Lord's sake, whether to the king as supreme, or to governors, as to those who are sent by him for the punishment of evildoers and *for the* praise of those who do good. For this is the will of God, that by doing good you may put to silence the ignorance of foolish men— as free, yet not using liberty as a cloak for vice, but as bondservants of God. Honor all *people*. Love the brotherhood. Fear God. Honor the king."

█, I'm thinking of the story where the chief priests and elders commanded Peter and John that they should no longer preach in the name of Jesus, and their wonderful response was, "Whether it is right in the sight of God to listen to you more than to God, you judge." (Acts 4:19) The difference in my mind is that those men were religious authorities, but **not government authorities**, if I am not mistaken.

In Acts 25 when Paul was on trial, he knew and confessed that he had NOT broken any law. "*..he [Paul] answered for himself, "Neither against the law of the Jews, nor against the temple, nor against Caesar have I offended in anything at all."*

These are just some of my thoughts. I'm not sure if any of you would have the time or inclination to add anything...but reading over some of the Word on a given subject always blesses me, so I'm hoping it has blessed you too.

I'll let the proper people know if and when her letter arrives.

<3

Hannah



MANHATTAN DECLARATION

Manhattan Declaration: A Call of Christian Conscience

Drafted on October 20, 2009

Released on November 20, 2009

EXHIBIT

8

SIGN THE MANHATTAN DECLARATION

Preamble

Christians are heirs of a 2,000-year tradition of proclaiming God's word, seeking justice in our societies, resisting tyranny, and reaching out with compassion to the poor, oppressed and suffering.

While fully acknowledging the imperfections and shortcomings of Christian institutions and communities in all ages, we claim the heritage of those Christians who defended innocent life by rescuing discarded babies from trash heaps in Roman cities and publicly denouncing the Empire's sanctioning of infanticide. We remember with reverence those believers who sacrificed their lives by remaining in Roman cities to tend the sick and dying during the plagues, and who died bravely in the coliseums rather than deny their Lord.

After the barbarian tribes overran Europe, Christian monasteries preserved not only the Bible but also the literature and art of Western culture. It was Christians who combated the evil of slavery: Papal edicts in the 16th and 17th centuries decried the practice of slavery and first excommunicated anyone involved in the slave trade; evangelical

Christians in England, led by John Wesley and William Wilberforce, put an end to the slave trade in that country. Christians under Wilberforce's leadership also formed hundreds of societies for helping the poor, the imprisoned, and child laborers chained to machines.

In Europe, Christians challenged the divine claims of kings and successfully fought to establish the rule of law and balance of governmental powers, which made modern democracy possible. And in America, Christian women stood at the vanguard of the suffrage movement. The great civil rights crusades of the 1950s and 60s were led by Christians claiming the Scriptures and asserting the glory of the image of God in every human being regardless of race, religion, age or class.

This same devotion to human dignity has led Christians in recent decades to work to end the dehumanizing scourge of human trafficking and sexual slavery, bring compassionate care to AIDS sufferers in Africa, and assist in a myriad of other human rights causes - from providing clean water in developing nations to providing homes for tens of thousands of children orphaned by war, disease and gender discrimination.

Like those who have gone before us in the faith, Christians today are called to proclaim the Gospel of costly grace, to protect the intrinsic dignity of the human person and to stand for the common good. In being true to its own calling, the call to discipleship, the church through service to others can make a profound contribution to the public good.

Declaration

We, as Orthodox, Catholic, and Evangelical Christians, have gathered, beginning in New York on September 28, 2009, to make the following declaration, which we sign as individuals, not on behalf of our organizations, but speaking to and from our communities. We act together in obedience to the one true God, the triune God of holiness and love, who has laid total claim on our lives and by that claim calls us with believers in all ages and all nations to seek and defend the good of all who bear his image. We set forth this declaration in light of the truth that is grounded in Holy Scripture, in natural human reason (which is itself, in our view, the gift of a beneficent God), and in the very nature of the human person. We call upon all people of goodwill, believers and non-

believers alike, to consider carefully and reflect critically on the issues we here address as we, with St. Paul, commend this appeal to everyone's conscience in the sight of God.

While the whole scope of Christian moral concern, including a special concern for the poor and vulnerable, claims our attention, we are especially troubled that in our nation today the lives of the unborn, the disabled, and the elderly are severely threatened; that the institution of marriage, already buffeted by promiscuity, infidelity and divorce, is in jeopardy of being redefined to accommodate fashionable ideologies; that freedom of religion and the rights of conscience are gravely jeopardized by those who would use the instruments of coercion to compel persons of faith to compromise their deepest convictions.

Because the sanctity of human life, the dignity of marriage as a union of husband and wife, and the freedom of conscience and religion are foundational principles of justice and the common good, we are compelled by our Christian faith to speak and act in their defense. In this declaration we affirm: 1) the profound, inherent, and equal dignity of every human being as a creature fashioned in the very image of God, possessing inherent rights of equal dignity and life; 2) marriage as a conjugal union of man and woman, ordained by God from the creation, and historically understood by believers and non-believers alike, to be the most basic institution in society and; 3) religious liberty, which is grounded in the character of God, the example of Christ, and the inherent freedom and dignity of human beings created in the divine image.

We are Christians who have joined together across historic lines of ecclesial differences to affirm our right - and, more importantly, to embrace our obligation - to speak and act in defense of these truths. We pledge to each other, and to our fellow believers, that no power on earth, be it cultural or political, will intimidate us into silence or acquiescence. It is our duty to proclaim the Gospel of our Lord and Savior Jesus Christ in its fullness, both in season and out of season. May God help us not to fail in that duty.

Life

So God created man in his own image, in the image of God he created him; male and female he created them. Genesis 1:27

I have come that they may have life, and have it to the full. John 10:10

Although public sentiment has moved in a pro-life direction, we note with sadness that pro-abortion ideology prevails today in our government. Many in the present administration want to make abortions legal at any stage of fetal development, and want to provide abortions at taxpayer expense. Majorities in both houses of Congress hold pro-abortion views. The Supreme Court, whose infamous 1973 decision in *Roe v. Wade* stripped the unborn of legal protection, continues to treat elective abortion as a fundamental constitutional right, though it has upheld as constitutionally permissible some limited restrictions on abortion. The President says that he wants to reduce the "need" for abortion—a commendable goal. But he has also pledged to make abortion more easily and widely available by eliminating laws prohibiting government funding, requiring waiting periods for women seeking abortions, and parental notification for abortions performed on minors. The elimination of these important and effective pro-life laws cannot reasonably be expected to do other than significantly increase the number of elective abortions by which the lives of countless children are snuffed out prior to birth. Our commitment to the sanctity of life is not a matter of partisan loyalty, for we recognize that in the thirty-six years since *Roe v. Wade*, elected officials and appointees of both major political parties have been complicit in giving legal sanction to what Pope John Paul II described as "the culture of death." We call on all officials in our country, elected and appointed, to protect and serve every member of our society, including the most marginalized, voiceless, and vulnerable among us.

A culture of death inevitably cheapens life in all its stages and conditions by promoting the belief that lives that are imperfect, immature or inconvenient are discardable. As predicted by many prescient persons, the cheapening of life that began with abortion has now metastasized. For example, human embryo-destructive research and its public funding are promoted in the name of science and in the cause of developing treatments and cures for diseases and injuries. The

President and many in Congress favor the expansion of embryo-research to include the taxpayer funding of so-called "therapeutic cloning." This would result in the industrial mass production of human embryos to be killed for the purpose of producing genetically customized stem cell lines and tissues. At the other end of life, an increasingly powerful movement to promote assisted suicide and "voluntary" euthanasia threatens the lives of vulnerable elderly and disabled persons. Eugenic notions such as the doctrine of lebensunwertes Leben ("life unworthy of life") were first advanced in the 1920s by intellectuals in the elite salons of America and Europe. Long buried in ignominy after the horrors of the mid-20th century, they have returned from the grave. The only difference is that now the doctrines of the eugenicists are dressed up in the language of "liberty," "autonomy," and "choice."

We will be united and untiring in our efforts to roll back the license to kill that began with the abandonment of the unborn to abortion. We will work, as we have always worked, to bring assistance, comfort, and care to pregnant women in need and to those who have been victimized by abortion, even as we stand resolutely against the corrupt and degrading notion that it can somehow be in the best interests of women to submit to the deliberate killing of their unborn children. Our message is, and ever shall be, that the just, humane, and truly Christian answer to problem pregnancies is for all of us to love and care for mother and child alike.

A truly prophetic Christian witness will insistently call on those who have been entrusted with temporal power to fulfill the first responsibility of government: to protect the weak and vulnerable against violent attack, and to do so with no favoritism, partiality, or discrimination. The Bible enjoins us to defend those who cannot defend themselves, to speak for those who cannot themselves speak. And so we defend and speak for the unborn, the disabled, and the dependent. What the Bible and the light of reason make clear, we must make clear. We must be willing to defend, even at risk and cost to ourselves and our institutions, the lives of our brothers and sisters at every stage of development and in every condition.

Our concern is not confined to our own nation. Around the globe, we are witnessing cases of genocide and "ethnic cleansing," the failure to assist those who are suffering as

innocent victims of war, the neglect and abuse of children, the exploitation of vulnerable laborers, the sexual trafficking of girls and young women, the abandonment of the aged, racial oppression and discrimination, the persecution of believers of all faiths, and the failure to take steps necessary to halt the spread of preventable diseases like AIDS. We see these travesties as flowing from the same loss of the sense of the dignity of the human person and the sanctity of human life that drives the abortion industry and the movements for assisted suicide, euthanasia, and human cloning for biomedical research. And so ours is, as it must be, a truly consistent ethic of love and life for all humans in all circumstances.

Marriage

The man said, "This is now bone of my bones and flesh of my flesh; she shall be called woman, for she was taken out of man." For this reason a man will leave his father and mother and be united to his wife, and they will become one flesh. Genesis 2:23-24

This is a profound mystery-but I am talking about Christ and the church. However, each one of you also must love his wife as he loves himself, and the wife must respect her husband. Ephesians 5:32-33

In Scripture, the creation of man and woman, and their one-flesh union as husband and wife, is the crowning achievement of God's creation. In the transmission of life and the nurturing of children, men and women joined as spouses are given the great honor of being partners with God Himself. Marriage then, is the first institution of human society- indeed it is the institution on which all other human institutions have their foundation. In the Christian tradition we refer to marriage as "holy matrimony" to signal the fact that it is an institution ordained by God, and blessed by Christ in his participation at a wedding in Cana of Galilee. In the Bible, God Himself blesses and holds marriage in the highest esteem.

Vast human experience confirms that marriage is the original and most important institution for sustaining the health, education, and welfare of all persons in a society. Where marriage is honored, and where there is a flourishing marriage culture, everyone

benefits-the spouses themselves, their children, the communities and societies in which they live. Where the marriage culture begins to erode, social pathologies of every sort quickly manifest themselves.

Unfortunately, we have witnessed over the course of the past several decades a serious erosion of the marriage culture in our own country. Perhaps the most telling - and alarming-indicator is the out-of-wedlock birth rate. Less than fifty years ago, it was under 5 percent. Today it is over 40 percent. Our society - and particularly its poorest and most vulnerable sectors, where the out-of-wedlock birth rate is much higher even than the national average - is paying a huge price in delinquency, drug abuse, crime, incarceration, hopelessness, and despair. Other indicators are widespread non-marital sexual cohabitation and a devastatingly high rate of divorce.

We confess with sadness that Christians and our institutions have too often scandalously failed to uphold the institution of marriage and to model for the world the true meaning of marriage. Insofar as we have too easily embraced the culture of divorce and remained silent about social practices that undermine the dignity of marriage we repent, and call upon all Christians to do the same.

To strengthen families, we must stop glamorizing promiscuity and infidelity and restore among our people a sense of the profound beauty, mystery, and holiness of faithful marital love. We must reform ill-advised policies that contribute to the weakening of the institution of marriage, including the discredited idea of unilateral divorce. We must work in the legal, cultural, and religious domains to instill in young people a sound understanding of what marriage is, what it requires, and why it is worth the commitment and sacrifices that faithful spouses make.

The impulse to redefine marriage in order to recognize same-sex and multiple partner relationships is a symptom, rather than the cause, of the erosion of the marriage culture. It reflects a loss of understanding of the meaning of marriage as embodied in our civil and religious law and in the philosophical tradition that contributed to shaping the law. Yet it is critical that the impulse be resisted, for yielding to it would mean abandoning the possibility of restoring a sound understanding of marriage and, with it, the hope of

rebuilding a healthy marriage culture. It would lock into place the false and destructive belief that marriage is all about romance and other adult satisfactions, and not, in any intrinsic way, about procreation and the unique character and value of acts and relationships whose meaning is shaped by their aptness for the generation, promotion and protection of life. In spousal communion and the rearing of children (who, as gifts of God, are the fruit of their parents' marital love), we discover the profound reasons for and benefits of the marriage covenant.

We acknowledge that there are those who are disposed towards homosexual and polyamorous conduct and relationships, just as there are those who are disposed towards other forms of immoral conduct. We have compassion for those so disposed; we respect them as human beings possessing profound, inherent, and equal dignity; and we pay tribute to the men and women who strive, often with little assistance, to resist the temptation to yield to desires that they, no less than we, regard as wayward. We stand with them, even when they falter. We, no less than they, are sinners who have fallen short of God's intention for our lives. We, no less than they, are in constant need of God's patience, love and forgiveness. We call on the entire Christian community to resist sexual immorality, and at the same time refrain from disdainful condemnation of those who yield to it. Our rejection of sin, though resolute, must never become the rejection of sinners. For every sinner, regardless of the sin, is loved by God, who seeks not our destruction but rather the conversion of our hearts. Jesus calls all who wander from the path of virtue to "a more excellent way." As his disciples we will reach out in love to assist all who hear the call and wish to answer it.

We further acknowledge that there are sincere people who disagree with us, and with the teaching of the Bible and Christian tradition, on questions of sexual morality and the nature of marriage. Some who enter into same-sex and polyamorous relationships no doubt regard their unions as truly marital. They fail to understand, however, that marriage is made possible by the sexual complementarity of man and woman, and that the comprehensive, multi-level sharing of life that marriage includes bodily unity of the sort that unites husband and wife biologically as one. This is because the body is no mere extrinsic instrument of the human

person, but truly part of the personal reality of the human being. Human beings are not merely centers of consciousness or emotion, or minds, or spirits, inhabiting non-personal bodies. The human person is a dynamic unity of body, mind, and spirit. Marriage is what one man and one woman establish when, forsaking all others and pledging lifelong commitment, they found a sharing of life at every level of being—the biological, the emotional, the dispositional, the rational, the spiritual—on a commitment that is sealed, completed and actualized by loving sexual intercourse in which the spouses become one flesh, not in some merely metaphorical sense, but by fulfilling together the behavioral conditions of procreation. That is why in the Christian tradition, and historically in Western law, consummated marriages are not dissoluble or annulable on the ground of infertility, even though the nature of the marital relationship is shaped and structured by its intrinsic orientation to the great good of procreation.

We understand that many of our fellow citizens, including some Christians, believe that the historic definition of marriage as the union of one man and one woman is a denial of equality or civil rights. They wonder what to say in reply to the argument that asserts that no harm would be done to them or to anyone if the law of the community were to confer upon two men or two women who are living together in a sexual partnership the status of being "married." It would not, after all, affect their own marriages, would it? On inspection, however, the argument that laws governing one kind of marriage will not affect another cannot stand. Were

it to prove anything, it would prove far too much: the assumption that the legal status of one set of marriage relationships affects no other would not only argue for same sex partnerships; it could be asserted with equal validity for polyamorous partnerships, polygamous households, even adult brothers, sisters, or brothers and sisters living in incestuous relationships. Should these, as a matter of equality or civil rights, be recognized as lawful marriages, and would they have no effects on other relationships? No. The truth is that marriage is not something abstract or neutral that the law may legitimately define and re-define to please those who are powerful and influential.

No one has a civil right to have a non-marital relationship treated as a marriage. Marriage is an objective reality—a covenantal union of husband and wife—that it is the duty of the law to recognize and support for the sake of justice and the common good. If it fails to do so,

genuine social harms follow. First, the religious liberty of those for whom this is a matter of conscience is jeopardized. Second, the rights of parents are abused as family life and sex education programs in schools are used to teach children that an enlightened understanding recognizes as "marriages" sexual partnerships that many parents believe are intrinsically nonmarital and immoral. Third, the common good of civil society is damaged when the law itself, in its critical pedagogical function, becomes a tool for eroding a sound understanding of marriage on which the flourishing of the marriage culture in any society vitally depends. Sadly, we are today far from having a thriving marriage culture. But if we are to begin the critically important process of reforming our laws and mores to rebuild such a culture, the last thing we can afford to do is to re-define marriage in such a way as to embody in our laws a false proclamation about what marriage is.

And so it is out of love (not "animus") and prudent concern for the common good (not "prejudice"), that we pledge to labor ceaselessly to preserve the legal definition of marriage as the union of one man and one woman and to rebuild the marriage culture. How could we, as Christians, do otherwise? The Bible teaches us that marriage is a central part of God's creation covenant. Indeed, the union of husband and wife mirrors the bond between Christ and his church. And so just as Christ was willing, out of love, to give Himself up for the church in a complete sacrifice, we are willing, lovingly, to make whatever sacrifices are required of us for the sake of the inestimable treasure that is marriage.

Religious Liberty

The Spirit of the Sovereign LORD is on me, because the LORD has anointed me to preach good news to the poor. He has sent me to bind up the brokenhearted, to proclaim freedom for the captives and release from darkness for the prisoners. Isaiah 61:1

Give to Caesar what is Caesar's, and to God what is God's. Matthew 22:21

The struggle for religious liberty across the centuries has been long and arduous. Religious liberty is not a novel idea or recent development, but is grounded in the

character of God Himself, the God who is most fully known in the life and work of Jesus Christ. Determined to follow Jesus faithfully in life and death, the early Christians appealed to the manner in which the Incarnation had taken place: "Did God send Christ, as some suppose, as a tyrant brandishing fear and terror? Not so, but in gentleness and meekness..., for compulsion is no attribute of God" (Epistle to Diognetus 7.3-4). Thus the right to religious freedom has its foundation in the example of Christ Himself and in the very dignity of the human person created in the image of God—a dignity, as our founders proclaimed, inherent in every human, and knowable by all in the exercise of right reason.

Christians confess that God alone is Lord of the conscience. Immunity from religious coercion is the cornerstone of an unconstrained conscience. No one should be compelled to embrace any religion against his will, nor should persons of faith be forbidden to worship God according to the dictates of conscience or to express freely and publicly their deeply held religious convictions. What is true for individuals applies to religious communities as well.

It is ironic that those who today assert a right to kill the unborn, aged and disabled and also a right to engage in immoral sexual practices, and even a right to have relationships integrated around these practices be recognized and blessed by law—such persons claiming these "rights" are very often in the vanguard of those who would trample upon the freedom of others to express their religious and moral commitments to the sanctity of life and to the dignity of marriage as the conjugal union of husband and wife.

We see this, for example, in the effort to weaken or eliminate conscience clauses, and therefore to compel pro-life institutions (including religiously affiliated hospitals and clinics), and pro-life physicians, surgeons, nurses, and other health care professionals, to refer for abortions and, in certain cases, even to perform or participate in abortions. We see it in the use of antidiscrimination statutes to force religious institutions, businesses, and service providers of various sorts to comply with activities they judge to be deeply immoral or go out of business. After the judicial imposition of "same-sex marriage" in Massachusetts, for example, Catholic Charities chose with great reluctance to end its century-long work of helping to place orphaned children in good homes rather than comply with a legal mandate that it place children in same-sex households in violation of

Catholic moral teaching. In New Jersey, after the establishment of a quasi-marital "civil unions" scheme, a Methodist institution was stripped of its tax exempt status when it declined, as a matter of religious conscience, to permit a facility it owned and operated to be used for ceremonies blessing homosexual unions. In Canada and some European nations, Christian clergy have been prosecuted for preaching Biblical norms against the practice of homosexuality. New hate-crime laws in America raise the specter of the same practice here.

In recent decades a growing body of case law has paralleled the decline in respect for religious values in the media, the academy and political leadership, resulting in restrictions on the free exercise of religion. We view this as an ominous development, not only because of its threat to the individual liberty guaranteed to every person, regardless of his or her faith, but because the trend also threatens the common welfare and the culture of freedom on which our system of republican government is founded. Restrictions on the freedom of conscience or the ability to hire people of one's own faith or conscientious moral convictions for religious institutions, for example, undermines the viability of the intermediate structures of society, the essential buffer against the overweening authority of the state, resulting in the soft despotism Tocqueville so prophetically warned of.¹ Disintegration of civil society is a prelude to tyranny.

As Christians, we take seriously the Biblical admonition to respect and obey those in authority. We believe in law and in the rule of law. We recognize the duty to comply with laws whether we happen to like them or not, unless the laws are gravely unjust or require those subject to them to do something unjust or otherwise immoral. The biblical purpose of law is to preserve order and serve justice and the common good; yet laws that are unjust-and especially laws that purport to compel citizens to do what is unjust-undermine the common good, rather than serve it.

Going back to the earliest days of the church, Christians have refused to compromise their proclamation of the gospel. In Acts 4, Peter and John were ordered to stop preaching. Their answer was, "Judge for yourselves whether it is right in God's sight to obey you rather than God. For we cannot help speaking about what we have seen and heard." Through the centuries, Christianity has taught that **civil disobedience** is not only

permitted, but sometimes required. There is no more eloquent defense of the rights and duties of religious conscience than the one offered by Martin Luther King, Jr., in his Letter from a Birmingham Jail. Writing from an explicitly Christian perspective, and citing Christian writers such as Augustine and Aquinas, King taught that just laws elevate and ennoble human beings because they are rooted in the moral law whose ultimate source is God Himself. Unjust laws degrade human beings. Inasmuch as they can claim no authority beyond sheer human will, they lack any power to bind in conscience. King's willingness to go to jail, rather than comply with legal injustice, was exemplary and inspiring.

Because we honor justice and the common good, we will not comply with any edict that purports to compel our institutions to participate in abortions, embryo-destructive research, assisted suicide and euthanasia, or any other anti-life act; nor will we bend to any rule purporting to force us to bless immoral sexual partnerships, treat them as marriages or the equivalent, or refrain from proclaiming the truth, as we know it, about morality and immorality and marriage and the family. We will fully and ungrudgingly render to Caesar what is Caesar's. But under no circumstances will we render to Caesar what is God's.

[SIGN THE MANHATTAN DECLARATION](#)

Drafting Committee

Robert George Professor, McCormick Professor of Jurisprudence, Princeton University

Timothy George Professor, Beeson Divinity School, Samford University

Chuck Colson Founder, the Chuck Colson Center for Christian Worldview (Lansdowne, VA)

¹Alexis de Tocqueville, Democracy in America

Drafting Committee

- Robert George
Professor, McCormick Professor of Jurisprudence, Princeton University
- Timothy George
Professor, Beeson Divinity School, Samford University
- Chuck Colson
Founder, The Chuck Colson Center for Christian Worldview (Lansdowne, Va.)

Signers (as of November 19, 2009)

1. Dr. Daniel Akin
President, Southeastern Baptist Theological Seminary (Wake Forest, N.C.)
2. Most Rev. Peter J. Akinola
Primate, Anglican Church of Nigeria (Abuja, Nigeria)
3. Randy Alcorn
Founder and Director, Eternal Perspective Ministries (EPM) (Sandy, Ore.)
4. Rt. Rev. David Anderson
President and CEO, American Anglican Council (Atlanta)
5. Leith Anderson
President of National Association of Evangelicals (Washington, D.C.)
6. Charlotte K. Ardizzone
TV Show Host and Speaker, INSP Television (Charlotte, N.C.)
7. Kay Arthur
CEO and Co-founder, Precept Ministries International (Chattanooga, Tenn.)

8. Dr. Mark L. Bailey
President, Dallas Theological Seminary (Dallas)
9. Most Rev. Craig W. Bates
Archbishop, International Communion of the Charismatic Episcopal Church (Malverne, N.Y.)
10. Gary Bauer
President, American Values; Chairman, Campaign for Working Families
11. His Grace, The Right Reverend Bishop Basil Essey
The Right Reverend Bishop of the Diocese of Wichita and Mid-America (Wichita, Kan.)
12. Joel Belz
Founder, World Magazine (Asheville, N.C.)
13. Rev. Michael L. Beresford
Managing Director of Church Relations, Billy Graham Evangelistic Association (Charlotte, N.C.)
14. Ken Boa
President, Reflections Ministries (Atlanta)
15. Joseph Bottum
Editor of *First Things* (New York)
16. Pastor Randy & Sarah Brannon
Senior Pastor, Grace Community Church (Madera, Calif.)
17. Steve Brown
National Radio Broadcaster, Key Life (Maitland, Fla.)
18. Dr. Robert C. Cannada, Jr.
Chancellor and CEO, Reformed Theological Seminary (Orlando, Fla.)
19. Galen Carey
Director of Government Affairs, National Association of Evangelicals (Washington, D.C.)

20. Dr. Bryan Chapell
President, Covenant Theological Seminary (St. Louis)
21. Most Rev. Charles J. Chaput
Archbishop, Roman Catholic Archdiocese of Denver
22. Timothy Clinton
President, American Association of Christian Counselors (Forest, Va.)
23. Chuck Colson
Founder, The Chuck Colson Center for Christian Worldview (Lansdowne, Va.)
24. Most Rev. Salvatore Joseph Cordileone
Bishop, Roman Catholic Diocese of Oakland, Calif.
25. Dr. Gary Culpepper
Associate Professor, Providence College (Providence, R.I.)
26. Jim Daly
President and CEO, Focus on the Family (Colorado Springs, Colo.)
27. Marjorie Dannenfelser
President, Susan B. Anthony List (Arlington, Va.)
28. Rev. Daniel Delgado
Board of Directors, National Hispanic Christian Leadership Conference; Pastor, Third Day
Missions Church (Staten Island, N.Y.)
29. Patrick J. Deneen
Tsakopoulos-Kounalakis Associate Professor and Director, The Tocqueville Forum on the Roots of
American Democracy, Georgetown University (Washington, D.C.)
30. Dr. James Dobson
Founder, Focus on the Family (Colorado Springs, Colo.)
31. Dr. David Dockery
President, Union University (Jackson, Tenn.)

32. Most Rev. Timothy Dolan
Archbishop, Roman Catholic Diocese of New York, N.Y.
33. Dr. William Donohue
President, Catholic League (New York)
34. Dr. James T. Draper, Jr.
President Emeritus, LifeWay (Nashville, Tenn.)
35. Dinesh D'Souza
Writer and Speaker (Rancho Santa Fe, Calif.)
36. Most Rev. Robert Wm. Duncan
Archbishop and Primate, Anglican Church in North America (Ambridge, Pa.)
37. Dr. Michael Easley
President Emeritus, Moody Bible Institute (Chicago)
38. Dr. William Edgar
Professor, Westminster Theological Seminary (Philadelphia)
39. Brett Elder
Executive Director, Stewardship Council (Grand Rapids, Mich.)
40. Rev. Joel Elowsky
Drew University (Madison, N.J.)
41. Stuart Epperson
Co-Founder and Chariman of the Board, Salem Communications Corporation (Camarillo, Calif.)
42. Rev. Jonathan Falwell
Senior Pastor, Thomas Road Baptist Church (Lynchburg, Va.)
43. William J. Federer
President, Amerisearch, Inc. (St. Louis)

44. Fr. Joseph D. Fessio

Founder and Editor, Ignatius Press (Ft. Collins, Colo.)

45. Carmen Fowler

President and Executive Editor, Presbyterian Lay Committee (Lenoir, N.C.)

46. Maggie Gallagher

President, National Organization for Marriage (Manassas, Va.)

47. Dr. Jim Garlow

Senior Pastor, Skyline Church (La Mesa, Calif.)

48. Steven Garofalo

Senior Consultant, Search and Assessment Services (Charlotte, N.C.)

49. Dr. Robert P. George

McCormick Professor of Jurisprudence, Princeton University (Princeton, N.J.)

50. Dr. Timothy George

Dean and Professor of Divinity, Beeson Divinity School at Samford University (Birmingham, Ala.)

51. Thomas Gilson

Director of Strategic Processes, Campus Crusade for Christ International (Norfolk, Va.)

52. Dr. Jack Graham

Pastor, Prestonwood Baptist Church (Plano, Texas)

53. Dr. Wayne Grudem

Research Professor of Theological and Biblical Studies, Phoenix Seminary (Phoenix)

54. Dr. Cornell "Corkie" Haan

National Facilitator of Spiritual Unity, The Mission America Coalition (Palm Desert, Calif.)

55. Fr. Chad Hatfield

Chancellor, CEO and Archpriest, St. Vladimir's Orthodox Theological Seminary (Yonkers, N.Y.)

56. Dr. Dennis Hollinger
President and Professor of Christian Ethics, Gordon-Conwell Theological Seminary (South Hamilton, Mass.)
57. Dr. Jeanette Hsieh
Executive Vice President and Provost, Trinity International University (Deerfield, Ill.)
58. Dr. John A. Huffman, Jr.
Senior Pastor, St. Andrews Presbyterian Church (Newport Beach, Calif.); Chairman of the Board, Christianity Today International (Carol Stream, Ill.)
59. Rev. Ken Hutcherson
Pastor, Antioch Bible Church (Kirkland, Wash.)
60. Bishop Harry R. Jackson, Jr.
Senior Pastor, Hope Christian Church (Beltsville, Md.)
61. Fr. Johannes L. Jacobse
President, American Orthodox Institute; Editor, OrthodoxyToday.org (Naples, Fla.)
62. Jerry Jenkins
Chairman of the Board of Trustees, Moody Bible Institute (Black Forest, Colo.)
63. Camille Kampouris
Editorial Board, Kairos Journal
64. Emmanuel A. Kampouris
Publisher, Kairos Journal
65. Rev. Tim Keller
Senior Pastor, Redeemer Presbyterian Church (New York)
66. Dr. Peter Kreeft
Professor of Philosophy, Boston College (Mass.) and at the Kings College (N.Y.)
67. Most Rev. Joseph E. Kurtz
Archbishop, Roman Catholic Archdiocese of Louisville, Ky.

68. Jim Kushiner
Editor, Touchstone (Chicago)
69. Dr. Richard Land
President, The Ethics and Religious Liberty Commission of the SBC (Washington, D.C.)
70. Jim Law
Senior Associate Pastor, First Baptist Church (Woodstock, Ga.)
71. Dr. Matthew Levering
Associate Professor of Theology, Ave Maria University (Naples, Fla.)
72. Dr. Peter Lillback
President, The Providence Forum (West Conshohocken, Pa.)
73. Dr. Duane Litfin
President, Wheaton College (Wheaton, Ill.)
74. Rev. Herb Lusk
Pastor, Greater Exodus Baptist Church (Philadelphia)
75. His Eminence Adam Cardinal Maida
Archbishop Emeritus, Roman Catholic Diocese of Detroit
76. Most Rev. Richard J. Malone
Bishop, Roman Catholic Diocese of Portland, Maine
77. Rev. Francis Martin
Professor of Sacred Scripture, Sacred Heart Major Seminary (Detroit)
78. Dr. Joseph Mattera
Bishop and Senior Pastor, Resurrection Church (Brooklyn, N.Y.)
79. Phil Maxwell
Pastor, Gateway Church (Bridgewater, N.J.)

80. Josh McDowell
Founder, Josh McDowell Ministries (Plano, Texas)
81. Alex McFarland
President, Southern Evangelical Seminary (Charlotte, N.C.)
82. Most Rev. George Dallas McKinney
Bishop, Founder and Pastor, St. Stephen's Church of God in Christ (San Diego)
83. Rt. Rev. Martyn Minns
Missionary Bishop, Convocation of Anglicans of North America (Herndon, Va.)
84. Dr. C. Ben Mitchell
Graves Professor of Moral Philosophy, Union University (Jackson, Tenn.)
85. Dr. R. Albert Mohler, Jr.
President, Southern Baptist Theological Seminary (Louisville, Ky.)
86. Anonymous
87. Most Rev. John J. Myers
Archbishop, Roman Catholic Archdiocese of Newark, N.J.
88. Most Rev. Joseph F. Naumann
Archbishop, Roman Catholic Diocese of Kansas City, Kan.
89. David Neff
Editor-in-Chief, *Christianity Today* (Carol Stream, Ill.)
90. Tom Nelson
Senior Pastor, Christ Community Evangelical Free Church (Leawood, Kan.)
91. Niel Nielson
President, Covenant College (Lookout Mt., Ga.)
92. Most Rev. John Nienstedt
Archbishop, Roman Catholic Archdiocese of Saint Paul and Minneapolis

93. Dr. Tom Oden
Theologian, United Methodist Minister; Professor, Drew University (Madison, N.J.)
94. Marvin Olasky
Editor-in-Chief, *World Magazine*; Provost, The Kings College (New York)
95. Most Rev. Thomas J. Olmsted
Bishop, Roman Catholic Diocese of Phoenix
96. Rev. William Owens
Chairman, Coalition of African-American Pastors (Memphis, Tenn.)
97. Dr. J.I. Packer
Board of Governors' Professor of Theology, Regent College (Canada)
98. Metr. Jonah Paffhausen
Primate, Orthodox Church in America (Syosset, N.Y.)
99. Tony Perkins
President, Family Research Council (Washington, D.C.)
100. Eric M. Pillmore
CEO, Pillmore Consulting LLC (Doylestown, Pa.)
101. Dr. Everett Piper
President, Oklahoma Wesleyan University (Bartlesville, Okla.)
102. Todd Pitner
President, Rev Increase
103. Dr. Cornelius Plantinga
President, Calvin Theological Seminary (Grand Rapids, Mich.)
104. Dr. David Platt
Pastor, Church at Brook Hills (Birmingham, Ala.)

105. Rev. Jim Pocock

Pastor, Trinitarian Congregational Church (Wayland, Mass.)

106. Fred Potter

Executive Director and CEO, Christian Legal Society (Springfield, Va.)

107. Dennis Rainey

President, CEO, and Co-Founder, FamilyLife (Little Rock, Ark.)

108. Fr. Patrick Reardon

Pastor, All Saints' Antiochian Orthodox Church (Chicago)

109. Bob Reccord

Founder, Total Life Impact, Inc. (Suwanee, Ga.)

110. His Eminence Justin Cardinal Rigali

Archbishop, Roman Catholic Archdiocese of Philadelphia

111. Frank Schubert

President, Schubert Flint Public Affairs (Sacramento, Calif.)

112. David Schuringa

President, Crossroads Bible Institute (Grand Rapids, Mich.)

113. Tricia Scribner

Author (Harrisburg, N.C.)

114. Dr. Dave Seaford

Senior Pastor, Community Fellowship Church (Matthews, N.C.)

115. Alan Sears

President, CEO, and General Counsel, Alliance Defense Fund (Scottsdale, Ariz.)

116. Randy Setzer

Senior Pastor, Macedonia Baptist Church (Lincolnton, N.C.)

117. Most Rev. Michael J. Sheridan

Bishop, Roman Catholic Diocese of Colorado Springs, Colo.

118. Dr. Ron Sider

Director, Evangelicals for Social Action (Wynnewood, Pa.)

119. Fr. Robert Sirico

Founder, Acton Institute (Grand Rapids, Mich.)

120. Dr. Robert Sloan

President, Houston Baptist University (Houston)

121. Charles Stetson

Chairman of the Board, Bible Literacy Project (New York)

122. Dr. David Stevens

CEO, Christian Medical and Dental Association (Bristol, Tenn.)

123. John Stonestreet

Executive Director, Summit Ministries (Manitou Springs, Colo.)

124. Dr. Joseph Stowell

President, Cornerstone University (Grand Rapids, Mich.)

125. Dr. Sarah Sumner

Professor of Theology and Ministry, Azusa Pacific University (Azusa, Calif.)

126. Dr. Glenn Sunshine

Chairman of the History Department, Central Connecticut State University (New Britain, Conn.)

127. Joni Eareckson Tada

Founder and CEO, Joni and Friends International Disability Center (Agoura Hills, Calif.)

128. Luiz Tellez

President, The Witherspoon Institute (Princeton, N.J.)

129. Dr. Timothy C. Tennent
President, Asbury Theological Seminary (Wilmore, Ky.)
130. Michael Timmis
Chairman, Prison Fellowship and Prison Fellowship International (Naples, Fla.)
131. Mark Tooley
President, Institute for Religion and Democracy (Washington, D.C.)
132. H. James Towey
President, St. Vincent College (Latrobe, Pa.)
133. Juan Valdes
Middle and High School Chaplain, Florida Christian School (Miami, Fla.)
134. Todd Wagner
Pastor, WaterMark Community Church (Dallas)
135. Dr. Graham Walker
President, Patrick Henry College (Purcellville, Va.)
136. Fr. Alexander F. C. Webster, Ph.D.
Archpriest, Orthodox Church in America; Professorial Lecturer, The George Washington University
(Ashburn, Va.)
137. George Weigel
Distinguished Senior Fellow, Ethics and Public Policy Center (Washington, D.C.)
138. David Welch
Houston Area Pastor Council Executive Director, US Pastors Council (Houston)
139. Dr. James Emery White
Founding and Senior Pastor, Mecklenburg Community Church (Charlotte, N.C.)
140. Dr. Hayes Wicker
Senior Pastor, First Baptist Church (Naples, Fla.)

141. Mark Williamson

Founder and President, Foundation Restoration Ministries/Federal Intercessors (Katy, Texas)

142. Parker T. Williamson

Editor Emeritus and Senior Correspondent, Presbyterian Lay Committee

143. Dr. Craig Williford

President, Trinity International University (Deerfield, Ill.)

144. Dr. John Woodbridge

Research Professor of Church History and the History of Christian Thought, Trinity Evangelical Divinity School (Deerfield, Ill.)

145. Don M. Woodside

Performance Matters Associates (Matthews, N.C.)

146. Dr. Frank Wright

President, National Religious Broadcasters (Manassas, Va.)

147. Most Rev. Donald W. Wuerl

Archbishop, Roman Catholic Archdiocese of Washington, D.C.

148. Paul Young

COO and Executive Vice President, Christian Research Institute (Charlotte, N.C.)

149. Dr. Michael Youssef

President, Leading the Way (Atlanta)

150. Ravi Zacharias

Founder and Chairman of the Board, Ravi Zacharias International Ministries (Norcross, Ga.)

151. Most Rev. David A. Zubik

Bishop, Roman Catholic Diocese of Pittsburgh

152. James R. Thobaben, Ph.D., M.P.H.

Professor, Bioethics and Social Ethics, Asbury Theological Seminary (Wilmore, Ky.)

SIGN THE MANHATTAN DECLARATION

© 2020 Manhattan Declaration All Rights Reserved.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

JANET JENKINS, et al.,

Plaintiffs,

v.

No. 2:12-cv-184-WKS

KENNETH L. MILLER, et al.,

Defendants.

**DECLARATION OF DIEGO A. SOTO IN SUPPORT OF
PLAINTIFFS’ REVISED SECOND MOTION TO COMPEL
DEFENDANTS LIBERTY COUNSEL, INC. AND RENA LINDEVALDSEN
TO COMPLY WITH PLAINTIFFS’ FIRST REQUESTS FOR PRODUCTION**

I, Diego A. Soto, declare under penalty of perjury that the following is true and correct:

1. I am a Staff Attorney at the Southern Poverty Law Center and represent Plaintiffs Janet Jenkins and Isabella Miller-Jenkins in this case.

2. On October 19, 2020, nonparty Deborah Thurman produced documents in response to Plaintiffs’ September 18, 2020 document subpoena, which Plaintiffs in turn produced to the parties as JENKINS24519–JENKINS28245. The following table shows the number of documents resulting from different searches within Thurman’s production:

| Search Term | Number of Resulting Documents |
|--|-------------------------------|
| '@liberty.edu' | 241 |
| '@lc.org' | 30 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND ('Lisa' OR 'Isabella' OR 'Izzy' OR 'Janet') | 157 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Lisa' | 109 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Isabella' | 109 |

| Search Term | Number of Resulting Documents |
|--|-------------------------------|
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Izzy' | 9 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Janet' | 57 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Vermont' | 43 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'VT' | 16 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Sessions' | 6 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Sharp' | 8 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Cohen' | 20 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'visitation' | 14 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Ken' | 4 |
| ('To' AND 'From' AND 'Subject' AND 'Date') AND ('@lc.org' OR '@liberty.edu') AND 'Timothy' | 5 |
| 'rlindevaldsen@liberty.edu' | 134 |
| 'rlindevaldsen@liberty.edu' AND ('Lisa' OR 'Isabella' OR 'Izzy' OR 'Janet') | 73 |
| 'rlindevaldsen@liberty.edu' AND ('Vermont' OR 'VT' OR 'Sessions' OR 'Sharp' OR 'Cohen' OR 'visitation') | 30 |
| 'mstaver@liberty.edu' | 37 |
| 'mstaver@liberty.edu' AND ('Lisa' OR 'Isabella' OR 'Izzy' OR 'Janet') | 24 |
| 'mstaver@liberty.edu' AND ('Vermont' OR 'VT' OR 'Sessions' OR 'Sharp' OR 'Cohen' OR 'visitation') | 12 |

3. The emails Plaintiffs cited in their October 2, 2020 letter ranged in size from 4 KB to 4,733 KB.
4. Exhibit 1 is a true and correct copy of emails exchanged between Tyler Clemons and Horatio Mihet.
5. Exhibit 2 is a true and correct copy of emails exchanged between me and Mr. Mihet.
6. Exhibit 3 is a true and correct copy of the letter I sent to Mr. Mihet on October 2, 2020.
7. Exhibit 4 is a true and correct copy of documents produced by nonparty Deborah Thurman, which Plaintiffs then produced to the parties with their Bates-stamp numbers.
8. Exhibit 5 is a true and correct copy of documents produced by Defendant Rena Lindevaldsen.
9. Exhibit 6 is a true and correct copy of documents produced by Defendant Response Unlimited, Inc.
10. Exhibit 7 is a true and correct copy of documents produced by Liberty Counsel, Inc.
11. Exhibit 8 is a true and correct copy of the website www.manhattandeclaration.org, which I downloaded on November 10, 2020.

Executed on November 11, 2020

/s/ Diego A. Soto
Diego A. Soto
Counsel for Plaintiffs
Janet Jenkins and Isabella Miller-Jenkins