1	UNITED STATES DISTRICT COURT
2	DISTRICT OF ARIZONA
3	Case No. CV 18-00621-PHX-DGC
4	x
5	THE SATANIC TEMPLE and MICHELLE :
б	SHORTT, :
7	Plaintiffs, :
8	vs. :
9	CITY OF SCOTTSDALE, ARIZONA, by :
10	its City Council, consisting of : Volume I
11	the Mayor and council members, : Pages 1 to 83
12	(Caption continued on following page)
13	
14	RULE 30(b)(6) TELEPHONIC DEPOSITION OF UNITED
15	FEDERATION OF CHURCHES LLC BY AND THROUGH
16	DOUGLAS ALEXANDER MISICKO
17	conducted at Spaces Newbury
18	359 Newbury Street, Boston, Massachusetts
19	on Tuesday, September 24, 2019
20	commencing 11:20 AM and ending 1:01 PM
21	reported by
22	Lawrence A. Brown, CSR, RPR and Notary Public
23	ATKINSON-BAKER, INC.
24	(800) 288-3376 - www.depo.com
25	ABI File Number AD08F98

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3	KEZHAYA LAW PLC	3	NUMBER DESCRIPTION FIRST MENTION
4	by Attorney Matthew A. Kezhaya (via telephone)	4	
5	1202 Northeast McClain Road	5	24 Trademark registration, October 30, 2018 30
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25		25	Binder of unused exhibits returned to Mr. Claus
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2 (Pages 2 to 5)

1	PROCEEDINGS		A Okay.
2		2	Q Focusing on the last sentence of paragraph
3	(Witness sworn.)	3	10, is it a true statement that at the times
4	MR. CLAUS: Thank you.	4	relevant to the litigation that is framed by the
5		5	first amended complaint that The Satanic Temple
б	DOUGLAS ALEXANDER MISICKO,	6	was given structure through the United Federation
7	a witness called by Counsel for the City	7	of Churches LLC?
8	Defendants, having identified himself by means of	8	A The The time framed by the first
9	his United States of America Passport Card and	9	amended complaint. I'm not sure I know what
10	having been duly sworn by the Notary Public, was	10	frame of time is is in question here. You
11	questioned and testified as follows:	11	mean when the when this was filed?
12	1	12	Q No. I'm So it says I'll just read
13	DIRECT EXAMINATION BY MR. CLAUS:	13	that last sentence starting on line 3 of page 3,
14	Q You're going to need your book back	14	paragraph 10 of the first amended complaint.
15	A Sure. It's It's right here.	15	A Okay.
16	O Great.	16	Q "At the times relevant to this litigation
17	Take a look at Exhibit 7.	17	TST," which is defined as The Satanic Temple,
18		18	"was given structure through United Federation of
19	A Okay. O Exhibit 7 is the potice of $20(h)(6)$	19	
	Q Exhibit 7 is the notice of 30(b)(6)	20	Churches LLC (DBA The Satanic Temple), a
20 21	deposition of the United Federation of Churches	20	Massachusetts LLC."
	LLC. Do you see that?		First did I read that correctly?
22	A Yes.	22	A Correct.
23	Q And please take a look at Exhibit A to	23	Q Is that a true statement, the sentence
24	Exhibit 7, which is the list of topics for which	24	that I just read?
25	you've been designated as the deponent. Exhibit	25	A "The Satanic Temple Inc. has been formally
	Page 6		Page 8
1	A to Exhibit 7.	1	recognized as a tax-exempt religious
2		2	organization"
3	A Okay. Yes.Q Do you agree that you're the person most	3	Q No. No.
4	knowledgeable about the topics listed in Exhibit	4	A "At the times relevant to this litigation,
5	A of Exhibit 7?	5	
6		6	TST was given structure through United
7	A The most knowledgeable representative of	7	Federations [sic] of Churches LLC (DBA The
8	the company in question.	8	Satanic Temple), a Massachusetts LLC."
9	Q Of the United federation of Churches LLC?		Q Yeah. And my question is is that a true
	A Correct. Yeah.	9	statement?
10	Q The United Federation of Churches LLC	10	A To the best of my knowledge, that is a
11	still exists as a limited liability company	11	true statement.
12	today. Correct?	12	Q Okay. Do you know how many members of The
13	A Correct.	13	Satanic Temple resided in Scottsdale, Arizona as
14	Q Let me ask you the question that we	14	of February 8, 2016?
15	alluded to in the previous deposition. How	15	A As of February 8, 2016. I have a
16	Oh, do you have your	16	different time frame. I don't have a I don't
17	A Yes.	17	have a number at a specific date. I have a time
18	Q the complaint there?	18	frame of between February and April 2016.
19	A Yeah.	19	Q Okay. So is the answer to my question
20	Q The first amended complaint, if you go to	20	that you do not know how many members of The
21	paragraph 10, which is on page 3	21	Satanic Temple resided in Scottsdale as of
22	A I see it.	22	February 8, 2016?
23	Q Just Just read paragraph 10 to yourself	23	A Correct. I can give you again a minimum
24	and let me know when you're done.	24	number from a time frame, but I I I don't
25	(Pause.)	25	have an exact number given our lack of geographic
I	D 7		
	Page 7		Page 9

3 (Pages 6 to 9)

¹ tracking.		1	Q If you look, Sir, at again Exhibit A to
2 Q Well, go to Exhib	it / again.	2	Exhibit 7
³ A Okay. And		3	A Okay.
4 Q You're still there.	1	4	Q topic topic number 3 provides a
⁵ A Oh, yeah.		5	an exact and discrete date range of February 8,
⁶ Q Exhibit 7.		6	2016 to July 6, 2016. Correct?
7 A Sure.		7	A Correct.
	bit 7. Topic 5 asked for	8	Q And if you turn the page to number 13,
	ponent to be knowledgeable	9	topic number 13 of Exhibit A to Exhibit 7
· • ·	tity and domicile of the	10	provides a discrete and exact date range
•	ent identified in the notice	11	from February 8, 2016 to July 6, 2016. Correct?
• •	through July 6, 2016. Do	12	Number You're still on Exhibit 7
¹³ you see that?		13	A Oh, okay.
14 A Yes.		14	Q the next page of Exhibit A to Exhibit
¹⁵ Q Also number 7 as	_	15	7. So turn the page
	the membership operations for	16	A Correct. Yeah. Yeah.
-	d in the notice including	17	Q Just turn the page. Topic number 13
¹⁸ the member on-boardi		18	identifies an exact and discrete date range of
	fees and uses thereof. Do	19	February 8, 2016 to July 6, 2016. Correct?
20 you see that?		20	A Correct.
21 A Yes.		21	Q Okay. So as of February 8, 2016, that
	imber 5 in Exhibit A to	22	date in the in the universe, do you know if
	the identity and domicile	23	any members of The Satanic Temple resided in
of the members of The	Satanic Temple as of	24	Scottsdale, Arizona as of February 8, 2016?
²⁵ February 8, 2016?		25	A I know I don't know why my search ended
	Page 10		Page 12
¹ A No. I know a minin	num number of members,	1	up being February to April 2016, but I have a
² but some of them I've nev	,	2	number a minimum number for that time frame.
	ow the Okay. Do you	3	Q That's not the time I'm not asking you
• • •	embers as of February 8, 2016?	4	about the time frame. I'm asking you as of
⁵ A February 8 Again	_	5	February 8, 2016 do you know if any members of
⁶ 2016. I know the minimu		6	The Satanic Temple, under penalty of perjury,
⁷ 2016.	· · · · · · ·	7	resided in the State of Arizona?
⁸ Q Did you do anyth	ing to become	8	A As of February 8th.
9 knowledgeable about t	-	9	Q Correct.
¹⁰ topic number 5 of Exhi	-	10	A Okay. No, I can't I cannot give you
¹¹ testify today?		11	I just can't I just don't have a number for an
¹² A Yes.		12	exact date. I can only do
¹³ Q Did you do anyth	ing to become	13	Q Okay.
	the identity and domicile of	14	A We can only do it in time frames.
	ponent as of February 8th,	15	Q Do you know, under penalty of perjury, if
¹⁶ 2016 ?		16	any members of The Satanic Temple resided in the
¹⁷ A As of February 8th,	no. I I went with	17	City of Scottsdale, Arizona as of February 8,
¹⁸ the time frame of Februar		18	2016?
¹⁹ thought that's what you w	· · · ·	19	A I I could not tell you that with
²⁰ Q Okay.		20	100-percent certainty.
21 (Pause.)		21	Q Okay.
(o off the record for a	22	(Pause.)
²³ second.		23	Q Do you know when the United Federation of
²⁴ (Pause.)		24	Churches LLC Well, let me ask this again,
²⁵ MR. CLAUS: Okay.	Let's go back on.	25	then:
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4 (Pages 10 to 13)

 and the penalty of partyry if any members of The Static Temple resided in the State of Arizona as of the discrete data July 6, 2015? A. D.I Do I know if there were any members of The Static Temple resided in the State of Arizona as of the data July 6, 2015? A 2015 Q. Let me ask it again. A 2015 Q. Let me ask it again. A. Oract. Q. Do you know, under penalty of perjury, if any members of The Static Temple resided in the State of Arizona as of July 6, 2015? A. Yes. I have a minimum number of membership in Arizona by that date of 12. Q. Do you know how if any members of The Static Temple resided in the City of ScottStale, Arizona as of July 6, 2015? A. A minimum number of five. Q. Who? A. That I do not know. M. K2E14Xi: An Q. Do you know the identify of the members of the State of Arizona as of July 6, 2015? A. Know them, How do you Can you A. Carret. Q. Do you know their identify? For instance, do you know their identify? For instance, do you know their dentify? For instance, do you know their anames? A. Agin people of their their residenci. A. Garnet. Her side of their their residenci. A. Garnet. Her words are entered by the organizer after that colon. Do you see that? A. Thos ry. The The knowledge of their their residence. Q. And the words are entered by the organizer after that colon. Do you see that? A. Carret. Q. And the words are entered by the organizer after that colon. Do you see that? A. Gartel. Q. Carret. Their mailing address is, we assume, their residence. Q. And the words are endered by the organizer after that colon. Do you see that? A. Carret. Q. And the words are endered by	1	Do you know and are you able to testify	1	Q If you'd turn to Exhibit 10
 Static Temple resided in the State of Arizona as of the discrete date July 6, 2016? A Di - Do I kowi (There were any members of The Static Temple hy the date of July 6, 2016? Q Let me ask it again. Q Let me ask it again. Q Do you know, under penalty of perjury, if any members of The Static Temple resided in the State of Arizona as of The Static Temple resided in the State of Arizona as of July 6, 2016? A M do you know how - if any members of The Static Temple resided in the State of Arizona as of July 6, 2016? A And do you know how - if any members of The Static Temple resided in the State of Arizona as of July 6, 2016? A And do you know how - if any members of the. Q Who? A Thet I do not know. M REZHAYA: An Q Do you know their define: - Explicit 10 entified you as the only manager when that entity was organizatio. Correct? Q Do you know their identity? For instance, A correct. Q Do you know their identity? For instance, A and we dont ast that they not. So we would have the members of the State of Arizona as of July 6, 2016? A Know them. How do you - Can you Q Do you know their identity? For instance, for you snow their identity? For instance, for you know their amaing address. A and we dont ast that they not. So we would have the members of the State of Arizona as of July 6, 2016? A Agin people of new sep evolusing their mailing address. Q And the number of members that you identified as a manager of the United Federation of Churches LLC any filing with the commonwealth of Massachusetts? A fang in people of new sep evolusing their mailing address is, we assume, their residence. Q Got it. Do you know when the United Federation of Churches LLC? 				
or the discrete data July 6, 20167 A D 1 - D 1 know if there were any members of The Statin Temple by the date of July G Let me ask it again. A - 2016 - Q Let me ask it again. A Okay. Q Do you know, under penalty of perjury, if any members of The Statin Temple resided in the State of Arizona as of the date July 6, 20167 A Yes. I have a minimum number of membership in Arizona by that date of 17. Q And do you know how if any members of The Statin Temple resided in the City of Socktale, Arizona as of July 6, 20167 A A minimum number of five. Q Do you know the identity of the members of The State of Arizona as of July 6, 20167 A A minimum number of five. Q Do you know we Q Do you know we A A minimum number of five. Q Do you know we A That id on the date July 6, 20167 A KizzWAYA: Ah - Page 14 O f the 17 members that you testified resided in the State of Arizon as of July 6, 20167				
 A Do I Do I know if there were any members of The Satanic Temple by the date of July 6 there were any a correct. Q Let me ask it again. A - 2016 Q Let me ask it again. Q Let me ask it again. Q Do you know, under penalty of perjury, if any members of The Satanic Temple resided in the State of Arizona as of the date July 6, 2016? A Yes. I have a minimum number of members of The Satanic Temple resided in the City of Scottadle, Arizona as of July 6, 2016? A That I do not know. Q Who? A That I do not know. M RCENAVA: Ah Q Do you know the identity of the members of The Satanic Temple resided in the State Page 14 O the 17 members that you testified resided in the State of Arizona as of July 6, 2016? A Know then. How do you - Can you Q Do you know the identity? For instance, do yain people of mumber address. A again people of neu use pseudonyms with us, and we dont ask that they not. So we would have the members that wou so and their mailing address. A Again people of neu use pseudonyms with us, and we dont ask that they not. So we would have the mamber of members that you ladentified as an tity? Q And the number of members that you ladentifie address. A Gorrect. A dagin people of neu use pseudonyms with us, and we dont ask that they not. So we would have the maining address. Q And the number of members that you ladentified as an tity? Q And the number of members that you ladentified as a do July 6, 2016? A The sort. Their mailing address. Q The knowledge of their the knowledge of their Q Got R. Q So Linow when the United Federation of Churches LLC. A Correct. Yes. A		-	4	-
6 members of The Satanic Temple type the date of July 6 A Correct. 9 Let me ask it again. A 1 A - 2016 - Q And Identifies Exhibit 10 Identifies 1 A Oby ou know, under penalty of perjury, if A Correct. 1 A Oby ou know, under penalty of perjury, if A Correct. 2 Do you know, under penalty of perjury, if A Correct. 3 A A an innum number of 4 A do you know howif any members of The Satanic Temple resided in the City of 5 Scottsdale, Arizona as of July 6, 2016? A 4 Minimum number of five. Q So the articlesthe corfficate, 9 Do you know the identity of the members of The Satanic Temple that resided in the State Page 14 10 G - the 17 members that you testified resided in the State Page 14 Page 16 11 of the 17 members that you testified resided in the State Page 14 Page 16 11 of the 17 members that you testified resided in the State Q Is that courset. Q 1 O the 17 members that you testifie		• •		-
9 Philodenergy 9 Philodenergy </th <th></th> <th></th> <th></th> <th></th>				
 Q Let me ask it again. A - 2016 Q Let me ask it again. A - 2016 Q Let me ask it again. A - 2016 Q Let me ask it again. A - 2016 Q Let me ask it again. Q And is a structure of the stanic Temple resided in the state of Arizona as of the date July 6, 2016? A Yes. I have a minimum number of membership in Arizona by that date of 17. Q And do you know how if any members of The Statanic Temple resided in the City of Scottsdale, Arizona as of July 6, 2016? A A minimum number of five. Q Who? A That I do not know. MR. KEJAWA: Ah Q Do you know thei identify of the members of The Statanic Temple that resided in the State Page 14 Page 14 Q Is that your signature? A Again people often use pseudonyms with us, and we dort ask that they not. So we would have the members that you many structure? A Again people often use pseudonyms with us, and we dort ask that they not. So we would have the members that you field resided in the City of Scottsdale, Airzona so fluy 6, 2016? A Again people often use pseudonyms with us, and we dort ask that they not. So we would have the members that you field residers. A Again people often use pseudonyms with us, and we dort ask that they not. So we would have the commonwealth of Massachusetts? A Again people often use pseudonyms with us, and we dort ask that they not. So we would have the words are entered by the organizer after the summers dy the organizer after the organge of Exhibit 10 identifies the general character? Q And the number of members that you signating address. Q The knowledge of their their residence. Q Got it. Q Got it. M Sorr, The - The knowledge of their their residence. Q And the words are entered are "educational activities and all other lawful purposes'? A Correct.<th></th><th></th><th></th><th></th>				
 A - 2016 Q Let me ask it again. A Correct. Q Do you know, under penalty of perjury, if any members of The Statnic Temple resided in the State of Arizona as of the date July 6, 2016? A Yes. I have a minimum number of G And do you know how if any members of Scottsdale, Arizona as of July 6, 2016? A That I do not know. Who? A That I do not know. W Who? A That I do not know. W KEZHAVX: Ah Q Do you know the identity of the members of The State of Arizona as of July 6, 2016? A That I do not know. W KEZHAVX: Ah Q Do you know the identity of the members of The State of Arizona as of July 6, 2016? A Correct. Q Do you know the identity of the members of The State of Arizona as of July 6, 2016? A Know them. How do you Can you Q Do you know their identity? For instance, A Again people often use pseudonyms with us, and we dont ask that hey not. Sow we would have the names they gave us and their mailing address. So that would be sufficient for us for identified as of July 6, 2016 who resided in the State of Arizona as of July 6, 2016? A Again people often use pseudonyms with us, and we dont ask that they not. Sow we would have the names they gave us and their mailing address. So that would be sufficient for us for identified as of July 6, 2016 who resided in the State of Arizona as of July 6, 2016 who reside in the State of Arizona as of July 6, 2016 who reside in the sumate and business of the United Federation of Churches LLC. True? A Correct. Their mailing address is, we assumm, their residence. Q So thit mow when the United Federation of Churches LLC? 				-
 1 A Chay. 2 Do you know, under penalty of perjury, if any members of The Satanic Temple resided in the State of Arizona as of the date July 6, 2016? 3 A Yes. I have a minimum number of membership in Arizona by that date of 17. 3 A di do you know how - if any members of The Satanic Temple resided in the City of Scottsale, Arizona as of July 6, 2016? 3 A A minimum number of five. 4 A minimum number of five. 9 Who? 4 A minimum number of five. 9 Who? 9 A di do you know how - if any members of The Satanic Temple resided in the State 9 Q Who? 9 A That I do not know. 9 MR. KEJHAVA: Ah 9 Q Do you know the identify of the members of The Satanic Temple that resided in the State 9 Page 14 9 Q I Is that your signature? 1 O f the 17 members that you testified resided in the State of Arizona as of July 6, 2016? 9 A Know them. How do you - Can you 9 Do you know wheir identify? For instance, do do yu know wheir identify? For instance, do do not as that houmbeg? 9 A The snowledge of the instance of the business of the United Federation of Churches LLC in any filing with the Commonwealth of Massachusetts? 9 A The snowledge of their go The knowledge of their their residence. 9 A The knowledge of their their residence. 9 A Correct. Their mailing address is, we assumm, their residence. 9 A Correct. Their mailing address is, we assumm, their residence. 9 A thick leace. 9 A				, .
11 A Okay. ILLC. Correct? 12 Q Do you know, under penalty of perjury, if any members of The Stanic Temple resided in the 14 State of Arizona as of the date July 6, 2016? A Number 6. Okay. 15 A Yes. I have a minimum number of five. G The Satanic Temple resided in the City of 16 The Satanic Temple resided in the City of G So the articles the certificate, 17 Q And do you know how if any members of G So the articles the certificate, 18 Scottsdale, Arizona as of July 6, 2016? A Number 6. Okay. 19 Scottsdale, Arizona as of July 6, 2016? G Do you know the identity of the members of 10 of the 17 members that you testified resided The Satanic Temple resided in the State 10 of the 17 members that you testified resided I Q Is that your signature? 11 of the 17 members that you - Can you Q Jo you know their identity? For instance, Q Is it accurate. Q Is it accurate. 12 Q Jo you know their identity? For instance, G Adm the unmber of members that you G Nuthee IA. Currect. 10 of the 17 members of members that you I Q Is that your signature? 11 Q Is that your signature?				
12 Q Do you know, under penalty of perjury, if 12 A I I dont see the wording "manager." 13 any members of The Satanic Temple resided in the State of Arizona as of the data July 6, 20167 13 Q Number 6. Okay. 14 14 A Number 6. Okay. 15 15 A Yes. I have a minimum number of membership in Arizona by that date of 17. 16 A Number 6. Okay. 16 The Satanic Temple resided in the City of Scottsdale, Arizona as of July 6, 20167 16 A Oh, of each manager. Okay. I gotha. 17 Yes. Q So the articles the certificate, rather, of organization for the United Federation of Churches LLC identified you as the only manager when that entity was organized. Correct? 16 A That I do not know. 17 Yes. 17 Yes. Q Do you know the identity of the members of The Satanic Temple that resided in the State 13 Q Do you recognize the signature on page 2 16 of the 17 members that you testified resided in the State of Arizona as of July 5, 2016? A It is. Q Is that your signature? 16 of the 17 members that you testified resided in the State of Arizona as of July 6, 2016? A It is. Q Is that your signature? 16 A - clarify Q Do you know wher i mailing address to divine tinamailing address to divine that movidege? <				
13 any members of The Satanic Temple resided in the State of Arizona as of the date July 6, 2016? 13 Q Number 6. 14 9 Number 0 13 Q Number 6. 15 membership in Arizona by that date of 17. 14 A Ob, of each manager. Okay. I gotcha. 16 membership in Arizona as of July 6, 2016? 15 A A minimum number of five. 16 The Satanic Temple resided in the City of 15 G So the articles the certificate, 17 Q Who? 16 A A minimum number of five. 17 17 Q Who? 17 A A minimum number of five. 18 Q So the articles the certificate, 18 Q Do you know. 17 Q Do you recognize the signature on page 2 19 19 The Satanic Temple that resided in the State 19 0 Do you recognize the signature on page 2 19 The Satanic Temple that resided in the State 10 Q Is that your signature? 10 The Satanic Temple that resided in the State of Arizona as of July 6, 2016? 11 Q Is that your signature? 11 Q Do you know their identity? For instance, Q Do you know their identity? For instance, Q Exhibit 10 identified sa manager of the				
14 State of Arizona as of the date July 6, 2016? 14 A Number 6. Okay. 15 A Yes. I have a minimum number of 15 Q The name and business address 17 Q And do you know how if any members of 16 17 18 The Stanic Temple resided in the City of 17 Q So the articles the certificate, 19 A minimum number of file. 17 Yes. 10 Mc Netziana as of July 6, 2016? 18 Q So the articles the certificate, 11 Mc KezHAYA: Ah 20 Q Do you recognize the signature on page 2 17 11 Of the 17 members that you testified resided in the State 14 Q List hat your signature? 12 A clarify Q Do you know + 7 A It is. 14 Q List hat your signature? A It is. 14 15 A clarify Q Do you know + 14 Has enver been identified as a manager of the 15 A opia people often use pseudonyms with us, and we dont ask that they not. So we would have the names they gave us and their mailing address. 14 Yes. 16 Q Do you know their anality. A That is accurate. Q Exhibit 10 identifies the general charact				
1 A Yes. I have a minimum number of membership in Arizona by that date of 17. Q And do you know they of any members of The Satanic Temple resided in the City of Scottsdale, Arizona as of July 6, 2015? A A minimum number of five. 2 A do you know their dentity of the members of The Satanic Temple that resided in the State A minimum number of five. 2 A That I do not know. Table, of organization for the United Federation of Churches LLC identified you as the only manager when that entity was organized. Correct? 2 A Do you know the identity of the members of The Satanic Temple that resided in the State Page 14 2 O Do you know them. How do you Can you Q Do you recognize the signature on page 2 3 A Know them. How do you Can you A dagin people often use pseudonyms with us, and we dont ask that they not. So we would have the mames they gave us and their mailing address. Q Do you nean by "general character"? 4 A Garie Correct. Their mailing address. Q And the words are entered by the organizer after that colon. Do you see that? 5 A The specification. Q 4 The sonawelth of the Linited Federation of Churches LLC ruse? 5 A dagin people often use pseudonyms with us, and we dont ask that they not. So we would have the mames they gave us and their mailing address. Q Do you see that? 5 Charcet of the business of the United Federa				
1 The function manager of the construction of the constructi		• •		
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			25	
Page 15 Page 17				
		Page 15		Page 17

5 (Pages 14 to 17)

1	A I do not.	1	A Correct.
2	Q Exhibit 11. Exhibit 11 is a limited	2	0 Has Michelle Shortt ever been identified
3	liab liability company annual report. Do you	3	as a resident agent of the United Federation of
4	see that?	4	Churches LLC?
5	A I do.	5	A She has not.
6	Q Filed on September 12, 2016. Do you see	6	Q Has anyone other than you ever been
7	that?	7	identified as an agent of the limited liability
8	A Yes.	8	company identified in Exhibit 12?
9	Q Identifies a different manager of the LLC	9	A Would not Cevin Soling be considered
10	as Cevin Soling. Correct?	10	identified as an agent from line 6 where it says
11	A Correct.	11	"name and business address of each manager"?
12	Q If you turn to the second page of Exhibit	12	Q Mr. Soling is identified as the manager.
13	11, do you see the handwritten signature at the	13	I'm asking you under line 5 Do you know that a
14	· · ·	14	
14	bottom of the page?	15	limited liability company under Massachusetts law
	A Oh, yes.		must identify a, quote, resident agent, end
16	Q Do you recognize that signature?	16 17	quote?
17	A I don't.		A My awareness of this is only through this
18	Q Do you recognize that signature to not be	18	very paperwork.
19	yours?	19	Q Okay. Do you know if anyone other than
20	A Ido.	20	you has been identified as a resident agent of
21	Q Okay. Turn back to page 1 of Exhibit 11.	21	the limited liability company identified in
22	The annual report is for the year 2015 and still	22	Exhibit 12? And if you don't know, that's fine.
23	identifies the general character of the business	23	Just tell me.
24	as "educational activities and all other lawful	24	A Well, I can say with almost certainty that
25	purposes." Correct?	25	nobody else has
	Page 18		Page 20
1	A Correct.	1	0 Okay
2	Q Do you see anything in Exhibit 11 that	2	Q Okay. A but I will I'll offer the caveat
3	specifically articulates a religious purpose to	3	
4	the limited liability company?	4	that it would not it would also not surprise
5	A I do not.	5	me if there were other paperwork in which Cevin
6		6	might be listed as a as a resident agent
7	Q Exhibit 12, please.	7	Q Okay.
	A Okay.	8	A as well.
8	Q This is a filing of an annual report for		Q And the annual report identified in
9	the limited liability company filed the same	9	Exhibit 12 is for the year 2016. True?
10	date, September 12, 2016. Do you see that?	10	A That's correct.
11	A Yes.	11	Q And the general character of the business
12	Q I'm going to ask you the same question	12	identified in line 3 of Exhibit 12 is the same as
13	that I asked about The Satanic Temple. Do you	13	in the certificate of organization and the prior
14	know if the United Federation of Churches LLC was	14	annual report, "educational activities and all
15	ever suspended by the Commonwealth of	15	other lawful purposes." Correct?
16	Massachusetts for failure to file an annual	16	A Correct.
17	report on a timely manner?	17	Q Do you see anything in Exhibit 12 that
18	A No.	18	articulates a religious purpose to the United
19	Q Do you know if the charter for the United	19	Federation of Churches LLC?
20	Federation of Churches LLC was ever revoked by	20	A I do not.
21	the secretary of the commonwealth?	21	Q And let's look at that handwritten
22	A It has not been.	22	signature on page 2.
23	Q Okay. So back to Exhibit 12, Exhibit 12	23	A Yes.
24	identifies you as the resident agent of the LLC.	24	Q Do you recognize that signature to not be
25	Correct?	25	your signature?
	Page 19		Page 21
	14501)		1 450 21

6 (Pages 18 to 21)

1	A Correct. I recognize that signature to	1	Q No. Exhibit 14 is a restated certificate
2	not be my own.	2	of organization. Do you see that?
3	Q Great. Turn to Exhibit 13, please.	3	A "Restated Certificate of Organization,"
4	A Okay.	4	yes. Okay. I understand that.
5	Q Exhibit 13 is the annual report for the	5	Q Filed in May of 2018. Correct?
6	United Federation of Churches LLC filed on April	6	A Correct.
7	3, 2017. Do you see that?	7	Q And Excuse me it provides if you
8	A Yes.	8	
9		9	go to page 2 of Exhibit 14, there's a box that
	Q Identifies you as the resident agent?		has the number 10
10	A Correct.	10	Do you see box 10?
11	Q And identifies Mr. Soling as the manager.	11	A Correct. Yes.
12	Correct?	12	Q that describes the amendments to be
13	A Correct.	13	affected by the restated certificate. Just read
14	Q Identifies the general character of the	14	it to yourself and let me know when you're done.
15	business in the same manner as the previous	15	(Pause.)
16	filings, "educational activities and all other	16	A Okay.
17	lawful purposes." Correct?	17	Q I'm going to ask you do you know if
18	A Correct.	18	Massachusetts law Do you see how it says that
19		19	
	Q Do you see anything in Exhibit 13 that		it's signed under penalties of perjury this 21st
20	identifies a religious purpose to the United	20	day of May 2018?
21	Federation of Churches LLC?	21	A Correct. I see that.
22	A I do not.	22	Q Do you know if Mr. Soling has legally
23	Q And again, if you go to the second page,	23	changed his name to Malcolm Jarry?
24	there is a handwritten signature. Do you	24	A I do not know
25	recognize that signature?	25	MR. KEZHAYA: Object as outside the scope
	Page 22		Page 24
1		1	
1	A I I do not.		of the 30(b)(6) deposition notice.
2	Q Do you recognize that signature to not be	2	Q So do you know?
3	yours?	3	A Well, should I I
4	A I recognize that signature to not be my	4	Q Yeah, you
5	own.	5	MR. KEZHAYA: Oh. Yeah, go ahead and
6	Q Great.	6	answer.
7	(Pause.)	7	THE WITNESS: Okay.
8	Q If you'd turn to Exhibit 14 We've	8	A I I have no knowledge of him changing
9	entered the age of digital filings Exhibit 14	9	his name.
10	is a restated certificate of organization. Do	10	Q Do you know if Massachusetts law Strike
11	you see how	11	that.
12	(Mr. Claus indicated.)	12	Do you know how the execution and filing
13		13	
	A I see that, yes.		of organizational documents with the secretary of
14	Q Filed May 21, 2018?	14	the commonwealth using a false name signed under
15	A It says two thousand Oh, okay. This	15	penalty of perjury impacts the ability of that
16	Okay. The date at the top says Oh, this is	16	organization to continue to do business?
17	for the original filing of the original	17	MR. KEZHAYA: Same objection.
18	organization. It says February 4, 2014.	18	Go ahead and answer.
19	Q Right. And if we	19	THE WITNESS: Okay.
20	A Okay.	20	A No, I do I I have no knowledge of
21	Q look back at Exhibit 10, we see that	21	that.
22	that is the date of the original filing, February	22	
23		23	Q Okay. If you turn to page 1 of Exhibit
23 24	4, 2014.		14 So still the same exhibit, but now we're
	A Okay. And this is an annual filing in	24	just turning back to page 1 the general
25	2018?	25	character of the business is now described as
		1	

7 (Pages 22 to 25)

1	"The purpose of the company is to conduct any and	1	filing of the first annual report, a manager of
2	all lawful business that can be performed by a	2	the United Federation of Churches LLC. True?
3	limited liability company formed under GL.c. 156C	3	A I'm sorry. Can you say that again.
4	including but not limited to educational	4	MR. CLAUS: Can you read it back, please.
5	activities, concluding the sale of any	5	(Record read.)
6	merchandise and literature and any and all	6	A I'm sorry. Yes. Correct.
7	activities incidental thereto."	7	Q Tab 16. Tab 16, Exhibit 16, is an annual
8	Did I read that correctly?	8	report of United Federation of Churches LLC. Do
9	A Correct.	9	you see that?
10	Q Still does not articulate a religious	10	A Yes.
11	purpose to the United Federation of Churches LLC.	11	Q And now changes the general character of
12	Correct?	12	the business and states that it engages in
13	A Correct.	13	campaigns and provides services that promote
14	Q Do you know if making a false statement in	14	reason and empathy and religious pluralism and
15	a filing with the Commonwealth of Massachusetts	15	sell merchandise to support these efforts. True?
16	impacts the ability of an organization to	16	A Correct.
17	continue to do business?	17	Q Has the United Federation of Churches LLC
18	A I	18	ever sought tax-exempt status from the IRS?
19	MR. KEZHAYA: Same objection.	19	A To my knowledge, that was never never
20	Go ahead and answer.	20	the route we pursued that with.
21	A I I I do not I do not know the	21	Q We can see, based upon Exhibit 16, that
22	the letter of the law on this.	22	because it was filed in February of 2019 that the
23	Q Okay. Turn to tab 15, please.	23	United Federation of Churches LLC has existed
24	Tab 15 is a certificate of amendment for	24	concurrently as a separate legal entity from The
25	the United Federation of Churches LLC. Do you	25	Satanic Temple Inc. True?
	Page 26		Page 28
1		_	
1	see that?	1 2	A As a separate legal entity. Correct.
2 3	A Yes.	3	Q And Exhibit 16 represents the first time
4	Q And identifies you in box 5 as the	4	that the United Federation of Churches LLC is
5	resident agent still. Correct? A Correct.	5	described as having been organized to engage in any type of religious activity. True?
6		6	A This is the first filing in which it
7	Q In box 6 it identifies two managers. Correct?	7	explicitly states any religious function.
8	A Correct.	8	Q Is it true to say that the United
9	Q But those two managers are in fact the	9	Federation of Churches LLC has never sought to
10	same person. Correct?	10	register as a foreign limited liability company
11	A Correct.	11	in the State of Arizona?
12	Q Have you ever notified As a	12	A I believe it is accurate to say that.
13	representative of and the resident agent for the	13	Q Has the United Federation of Churches LLC
14	United Federation of Churches LLC, have you ever	14	ever filed anything with the Arizona Corporation
15	notified the secretary of the commonwealth that	15	Commission?
16	any misleading statements were ever made in an	16	A To my knowledge, no.
17	organizational filing on behalf of the United	17	Q Has the United Federation of Churches LLC
18	Federation of Churches LLC?	18	ever made a filing with the Arizona Secretary of
19	A I have not.	19	State?
20	Q And in fact if you look at box 10 on the	20	A To my knowledge, no.
21	second page of Exhibit 15, the purpose of the	21	(Pause.)
22	amendment is specifically articulated to add a	22	Q Let me ask you about these trademark
23	manager, slash, officer. Do you see that?	23	applications again as the designee of the United
24	A Yes.	24	Federation of Churches LLC. Go to Exhibit 23,
25	Q But Mr. Soling was always, since the	25	please.
			F
	Page 27		Page 29

8 (Pages 26 to 29)

1		
1 2	A 23. Okay.	¹ voice for the United Federation of Churches, I
	Q Exhibit 23 is a trademark application	² don't
3	application filed on May 24, 2019 for the	³ Q Well, but you're not a manager of the
4	trademark "The Satanic Temple." Do you see that?	4 United Federation of Churches LLC. Correct?
5	A Yes.	⁵ A Right. I'm a I'm a member. Isn't
6	Q That identifies the applicant as the	6 Isn't that the language we're
7	United Federation of Churches LLC. Do you see	7 Q Well, if we look back at Exhibit 11
8	that?	⁸ A Okay.
9	A Applicant Yes, I see that.	9 Q Exhibit 11 identifies the manager on
10	Q So do you know And And you may not	¹⁰ line 6 as Cevin Soling. Correct?
11	know this that when an application is filed	¹¹ A Correct.
12	with the United States Patent & Trademark Office	¹² Q And And And the commonwealth
13	that a representation is made under penalty of	¹³ required you to identify the name and business
14	perjury regarding who uses a mark in commerce and	¹⁴ address of each manager of the limited liability
15	who uses a mark in interstate commerce?	¹⁵ company. Correct?
16	MR. KEZHAYA: Object as outside of the	¹⁶ A Correct. You're right.
17	30(b)(6) notice.	17 Q And Cevin Soling is list identified as
18	Go ahead and answer.	¹⁸ the only manager. Correct?
19	A No, I'm not aware of the relevant legal	¹⁹ A Correct.
20	background on that.	20 Q And if you turn to the next page, number
21	Q Okay. If you'd turn to just Exhibits 24	 7, you are identified as someone who is not a
22	and 25, these are trademark registrations for the	manager but given limited authority to, quote,
23	trademark "TST" and design and the word mark	 execute documents filed with the corporation
24	"Satanic Temple" that reflects ownership of that	²⁴ division. Correct?
25	registration by the United Federation of Churches	25 A Correct.
20	registration by the onited rederation of churches	A concel.
	Page 30	Page 32
1	LLC Correct? You have to go to the payt page	1 O Okay. And if we turn to Exhibit 12 So
2	LLC. Correct? You have to go to the next page for Exhibit 24.	
3		
4	A Yes, I see that on there.	manager. For the year 2010, in Exhibit 12, you
5	Q And Exhibit 25, at the bottom of the first	Were not the managerr correct.
6	page, reflects the owner as the United Federation	
	of Churches LLC.	Q In the year 2017 you were not the manager
7	A Correct.	Contecti
8	Q Has the United Federation of Churches LLC	⁸ A On
9	ever assigned the trademark reflected in Exhibits	⁹ Q Exhibit 13.
10	24 and 25 to any person or entity?	10 A 13?
11	A Assigned the trademark to any person or	11 Correct. Here again I'm the resident
12	entity. Again, you know, I operate under	12 agent.
13	under just this operational understanding that	¹³ Q Right. In Exhibit 15 you are not
14	I'm acting as The Satanic Temple. So when we do	identified as a manager. Correct?
15	these kind of licensing agreements with chapters	¹⁵ A Correct. I'm listed as resident agent.
16	and other such entities, you know, I'm not	¹⁶ Q In Exhibit 16 for the year 2019 you were
17	thinking it in terms of distinguishing it from	¹⁷ not identified as a manager. Correct?
18	United Federation of Churches or or The	¹⁸ A Correct. I am listed as resident agent.
19	Satanic Temple Inc.	¹⁹ Q Okay. So let's turn back to Exhibit 25.
20	Q Well, you just used the the the	²⁰ A 25. Okay.
21	first person pronoun "I." I just want to make	21 Q A document with a registration date of
22	sure I understand. You, Douglas Misicko, are not	²² February 10, 2015. Correct?
23	the owner of any of the trademarks reflected in	²³ A I'm sorry. Let me Let me see.
24	Exhibits 23, 24 or 25. Correct?	²⁴ Q "Registration Date."
25	A Correct. But as as a authoritative	²⁵ (Mr. Claus indicated.)
	Page 31	Page 33

9 (Pages 30 to 33)

¹ A Oh, okay. Okay.	¹ Michelle Shortt ever ask Cevin Soling, as the
² Q February 10, 2015. Correct?	 ² manager of the United Federation of Churches LLC,
³ A I see that, yes.	 a for permission to speak on behalf of that legal
4 Q For the trademark "The Satanic Temple."	⁴ entity?
	⁵ A Not that I'm aware of.
A concel.	Q There is restainly of 2010 and menene
7 Q We know, having now looked at the	7 Shortt ever ask any ever ask the manager of
⁸ organizational filings with the commonwealth,	8 the United Federation of Churches LLC for
⁹ that as of February 10, 2015 you were not a	⁹ permission to speak on behalf of something called
¹⁰ manager of the United Federation of Churches LLC.	¹⁰ the Arizona Chapter of The Satanic Temple?
¹¹ Correct?	A So you're asking if she had this
¹² A Correct.	12 conversation with Cevin Soling?
¹³ Q So do you see there is a tab that says	¹³ Q On Prior to February 8, 2016. I'll
¹⁴ "Assign Status" on Exhibit 25?	¹⁴ just ask it again.
¹⁵ A I see that.	¹⁵ A Okay.
¹⁶ Q Do you know if a document has been filed	¹⁶ Q Do you know if prior to February 8,
¹⁷ with the United States Patent & Trademark Office	¹⁷ 2016 or on February 8, 2016, if Michelle Shortt
¹⁸ that assigns the trademark reflected in Exhibit	¹⁸ ever sought permission from the manager of the
¹⁹ 25 to any individual or entity other than the	¹⁹ United Federation of Churches LLC for permission
²⁰ United Federation of Churches LLC?	to speak on behalf of an organization that called
A I do not know that that has ever taken	 itself the Arizona Chapter of The Satanic Temple?
²² place.	²² A I do not know of any such discussion.
²³ Q Okay. Do you know if the United	 Q Did Mr. Soling, as the only manager of the
²⁴ Federation of Churches LLC has entered into a	
reactation of charches EEC has cheered into a	
²⁵ licensing agreement with The Satanic Temple Inc.	²⁵ it all over again.
Page 34	Page 36
¹ whereby The Satanic Temple Inc. is permitted to	¹ Did Mr. Soling, as the only manager of the
 a whereby the satalic relipie Inc. is permitted to lawfully use the trademark, quote, The Satalic 	² United Federation of Churches LLC from 2015 to
autury use the trademarky quote, the saturde	
Temple, end quote:	2013) even content dutionity on Phenene onorte to
A Again let me say I know of no legal	 act as an authorized representative of the United Federation of Churches LLC?
diachgia	A now, if you're usking for a direct
Q The booked at paragraph 10 of the mot	discussion between menene and cevin, I would
⁸ amended complaint which alleged that The Satanic	know of ho such thing. But I do know that as
⁹ Temple was given organizational structure by the	agents contened with the dationty to give such
¹⁰ United Federation of Churches LLC. Do you	10 permission as given our organizational
¹¹ remember that?	¹¹ structure of The Satanic Temple, the National
¹² A Yes.	¹² Council and myself, she was she was I know
¹³ Q You've watched I'm assuming you've	¹³ she was explicitly given that permission by
¹⁴ watched the documentary Hail Satan.	¹⁴ myself.
¹⁵ A Yeah. I've seen that a few times.	¹⁵ Q Does the United Federation of Churches LLC
¹⁶ Q I think it's very well done.	¹⁶ have an operating agreement?
¹⁷ In the number of times that you've seen	¹⁷ A Yes.
¹⁸ the documentary Hail Satan were you able to	¹⁸ Q When did that operating agreement get
¹⁹ identify any false or misleading statements made	¹⁹ entered into?
²⁰ by Michelle Shortt or Stu de Haan in that	
	²⁰ A The United Federation of Churches LLC?
²¹ documentary?	 A The United Federation of Churches LLC? Q Mm-hmm.
²¹ documentary?	The officer reactation of charches EEc.
 documentary? A No, I cannot think of any false or 	21 Q Mm-hmm.
 documentary? A No, I cannot think of any false or misleading statements by either of them in the 	21 Q Mm-hmm. 22 A I I'm not I'm not certain, no.
 documentary? A No, I cannot think of any false or misleading statements by either of them in the documentary. 	21 Q Mm-hmm. 22 A I I'm not I'm not certain, no. 23 Q Okay. Do you know if the operating
 documentary? A No, I cannot think of any false or misleading statements by either of them in the documentary. 	21 Q Mm-hmm. 22 A I I'm not I'm not certain, no. 23 Q Okay. Do you know if the operating 24 agreement of the United Federation of Churches

10 (Pages 34 to 37)

¹ A It is my understanding that it did.	¹ Temple?
² Q Have you reviewed the operating agreement	² A Yes, it's my understanding that she is.
³ of the United Federation of Churches LLC to	³ O When did she become a member?
 4 prepare for your deposition today? 	4 A I I'm not certain.
⁵ A Yes. And I believe it was from 2014.	⁵ (Pause.)
A Test And I believe it was notifized it.	6 Q Do you know Do you know if Michelle
Q Does the operating agreement of onited	
reactation of charches Lee conter agency	
authority on anyone other than the manager of	
	it is my understanding that she wash
Q Okay. So I'm going to ask it I'm going	11 understanding? 12 A From Michelle Shortt herself
12 to ask my question again.	
13 Do you know It's not communications.	13 Q Have you seen any documents or any records
14 Do you know if the manager of the United	14 in preparation for your deposition today
¹⁵ Federation of Churches LLC ever conferred	demonstrating that Michelle Shortt was in fact a
¹⁶ authority on Michelle Shortt to act as an	16 member of The Satanic Temple as of February 8,
¹⁷ authorized representative of the United	17 2016?
18 Federation of Churches LLC?	¹⁸ A Not in preparation of my deposition, but I
¹⁹ A Well, I would say indirectly. And maybe	¹⁹ know she has a certificate of membership.
that doesn't meet your criteria, but I'm	Q And when was the certificate of membership
explicitly given the permission to confer	²¹ sought?
²² agents with permission to use that type of	A That I do not know.
²³ licensing.	²³ Q You don't know the date?
24 Q But not by the operating agreement.	A I do not know the date.
²⁵ Correct?	²⁵ Q When was the certificate of membership
Page 38	Page 40
¹ A Not Not by the operating agreement.	¹ granted?
2 Q Okay.	² A I do not know a date for that either.
3 A Just by	³ Q Hmm. Is there currently an Arizona
4 Q So did Let me just ask you this: Have	4 chapter of The Satanic Temple?
5 you ever seen a written communication or	5 A There is.
6 Strike that.	6 Q That chapter did not exist as of February
7 Have you ever seen a written document	⁷ 1, 2016. Is that correct?
⁸ where Mr. Soling, as the only manager of the	⁸ A I I don't know. I do not know
⁹ United Federation of Churches LLC, conferred	⁹ their founding date.
¹⁰ authority on Michelle Shortt to act as an	10 Q You know that the chapters of The Satanic
authorized representative of the United	¹¹ Temple are identified on the Web site
¹² Federation of Churches LLC?	¹² www.thesatanictemple.com?
¹³ A I know of no such documentation.	¹³ A Correct.
¹⁴ Q Have you Has Mr. Soling ever told you	14QIf you'd turn to Exhibit 37, please.
¹⁵ that he, as the only manager of the United	¹⁵ MR. KEZHAYA: Hold on one second so I can
¹⁶ Federation of Churches LLC, ever conferred	¹⁶ navigate to that. I only got up to 34.
¹⁷ authority on Michelle Shortt to act as an	17 MR. CLAUS: Sure.
¹⁸ authorized representative of the United	¹⁸ MR. KEZHAYA: You said 37?
¹⁹ Federation of Churches LLC?	¹⁹ MR. CLAUS: Yes.
²⁰ A Well, he was made aware of my	²⁰ MR. KEZHAYA: Okay. I'm here.
 conversations with Michelle Shortt and approved 	21 Q Exhibit 37 is an archived Web site from
²² of her being authorized to speak on behalf of The	²² February 24, 2015 that identifies chapters of The
 Satanic Temple at the invocation. 	23 Satanic Temple. Do you see that?
24 Q Is Michelle Shortt a member of the	²⁴ A Correct.
 organization that calls itself The Satanic 	²⁵ Q Eight chapters are identified?
Page 39	Page 41

11 (Pages 38 to 41)

1	A Correct.	1	A Okay.
2	Q None of those eight are Arizona. Correct?	2	Q Exhibit 27 is an archived Web page from
3	A Correct. However, there can sometimes be	3	The Satanic Temple, www.thesatanictemple.com,
4	a real time lag between when a chapter is formed	4	dated January 15, 2013. Do you see that?
5	and when it's posted on the Web site. It's not	5	A I see that.
6	often immediate. So it doesn't give me a clear	6	Q With a heading, quote, Religious Beliefs
7	indication of their founding date. But I do	7	of The Satanic Temple, end quote. Do you see
8	remember that requesting an invocation in Phoenix	8	that?
9	and Scottsdale were two kind of foundational	9	A I see that.
10	activities for the Arizona chapter when they	10	Q I'm going to read the text, and you just
11	were when they were collecting when they	11	tell me if I read it correctly because it's
12	were nascent in in building their community.	12	rather small.
13	Q If you'd turn to Exhibit 40, which is tab	13	A Right.
14	40.	14	Q "The Satanic Temple believes that God is
15	MR. KEZHAYA: Just a moment here.	15	supernatural and thus outside of the sphere of
16	MR. CLAUS: Sure.	16	the physical. God's perfection means that he
17	MR. KEZHAYA: I believe I'm at it. Okay.	17	cannot interact with the imperfect corporeal
18	Q This is an Internet archive from February	18	realm. Because God cannot intervene in the
19	1, 2016?	19	material world, he created Satan to preside over
20	A Okay.	20	the universe as his proxy. Satan has the
21	Q Correct?	21	compassion and wisdom of an angel. Although
22	A February Yes. Sorry.	22	Satan is subordinate to God, he is mankind's only
23	Q And the Arizona chapter is still not	23	conduit to the dominion beyond the physical. In
24	identified as a chapter on the Web site of The	24	addition, only Satan can hear our prayers and
25	Satanic Temple as of February 1, 2016?	25	only Satan can respond. While God is beyond
25	Satanic relipte as of February 1, 2010?	23	only Satan can respond. While God is beyond
	Page 42		Page 44
1	A I I see that. Correct. It It might	1	human comprehension, Satan desires to be known
2	just be that they didn't have a Web site yet,	2	and knowable. Only in this way can there be
3	though.	3	justice and can life have meaning. Hail Satan,
4	Q The religious aspect of The Satanic Temple	4	exclamation point."
5	is moored in the firmly held beliefs of its	5	Did I read that correctly?
6	members. Is that right?	6	A Yes.
7	A Correct.	7	Q Do you know Strike that.
8	Q Is one of those firmly held beliefs that a	8	Also one of the firmly held religious
9	supernatural god created an actual Satan to	9	beliefs of The Satanic Temple now is moored in
10	preside over the universe as his proxy?	10	the seven tenets. Is that correct?
11	A It is not. It's Not in literal	11	A Correct.
12		12	
13	terminology any in any case. That could be taken metaphorically but not not in the	13	Q But there have not always been seven tenets. Correct?
14	· ,	14	
14	supernatural sense.	14	A Correct.
16	Q Is a firmly held belief of The Satanic	16	Q In fact if you look at Exhibit 28
17	Temple that Satan hears our prayers and responds?		A Why is mine missing?
18	A It is not.	17 18	Q Oh. Shoot. I'll give you mine.
19	Q Is a firmly held belief of The Satanic	19	MR. CLAUS: Do you have Exhibit 28, Matt?
	Temple that Satan can exist in a corporeal realm?	20	MR. KEZHAYA: I believe so. I have a
20 21	A It is not.	20	document after a number as Exhibit 28.
21	Q But all of those firmly held beliefs were	21	MR. CLAUS: Yeah.
22	the beliefs of The Satanic Temple at one point.		MR. KEZHAYA: It has what looks like a
23	Correct?	23 24	tarot card, the devil
24 25	A Incorrect.	24	MR. CLAUS: That's it.
20	Q Go to Exhibit 27, please.	20	MR. KEZHAYA: Okay.
	Page 43		Page 45

12 (Pages 42 to 45)

 page numbers. We'll just make this the official Exhibit 28. We'll pop it in your binder. A Oksy. Q Go to - Go to page 6 since - A Oksy. Q Go to - Go to page 6 since A Oksy. Q Right. C Right. <	1	Q So handing you Exhibit 28, I inserted the	¹ Q Do you see that tenet articulated among
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10A Yes.10That's one of the seven tenets?11Q And I'm going to just read them.11A Correct.12"1. One should strive to act with12Q Is that tenet articulated among the nine13compassion and empathy toward all creatures in13in Exhibit 28?14accordance with reason."14A Somewhat under different wording of number15That's number 1?153 here, but16A Correct.16Q Okay.17Q Do you see that tenet articulated in the17A but no, not in this exact form.18nine fundamental tenets that were articulated in18Q And then the last of the seven tenets is19January 2013?19"Every tenet is a guiding principle designed to20A No.20inspire nobility in action and thought. The21Q "2. The struggle for justice is an2122ongoing and necessary pursuit that should prevail2223over laws and institutions."2324That's one of the seven tenets. Correct?2425A Correct.25A Not verbatim but very close.			and resolve any name that might have been
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16A Correct.16Q Okay.17Q Do you see that tenet articulated in the17A but no, not in this exact form.18nine fundamental tenets that were articulated in18Q And then the last of the seven tenets is19January 2013?19"Every tenet is a guiding principle designed to20A No.20inspire nobility in action and thought. The21Q "2. The struggle for justice is an2123ongoing and necessary pursuit that should prevail2224That's one of the seven tenets. Correct?2425A Correct.25			A Somewhat and a marchene wording of hamber
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20A No.20Inspire nobility in action and thought. The21Q "2. The struggle for justice is an21spirit of compassion, wisdom and justice should22ongoing and necessary pursuit that should prevail22always prevail over the written or spoken word."23over laws and institutions."23I think that tenet is actually tenet 9 on24That's one of the seven tenets. Correct?24Exhibit 28. Correct?25A Correct.25A Not verbatim but very close.			-
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24That's one of the seven tenets. Correct?24Exhibit 28. Correct?25A Correct.25A Not verbatim but very close.			
²⁵ A Correct. ²⁵ A Not verbatim but very close.			
Page 47 Page 49	25	A Correct.	²⁵ A Not verbatim but very close.
Page 47 Page 49		_	
	1	Page 47	Page 49

13 (Pages 46 to 49)

1	Q Okay. Do you know if, as of February 8,	¹ was the	at name first used, and we still have the
2	2016, Michelle Shortt Go back to Exhibit 27.		te so it seemed accurate. I don't see that
3	Do you know if, as of February 8, 2016,	1100 01	actually
4	Michelle Shortt adhered to the, quote, religious	chac 5 c	Well, these are all predicate questions.
5	beliefs that The Satanic Temple, end quote,	. . .	
6	articulated in Exhibit 27?		Okay.
7			Let me ask you this: Has Michelle Shortt
	A Oh, no. As far as I know, nobody with The		old you expressly that she does not adhere
8	Satanic Temple now has any connection to this Web		religious beliefs that The Satanic Temple
9	site, including myself. I This Web site	articu	lated in Exhibit 27?
10	predates me and was rather a placeholder site for		No. I'm No. As far as I know, she's
11	www.thesatanictemple.com. So later on I came on		even seen this. So I have no idea.
12	board and was more the philosophical author of	-	Okay.
13	the actual beliefs of what became The Satanic	13 A S	She She Her Her only requirement
14	Temple. And so this was all I'm not even sure	¹⁴ is to ag	ree with the seven tenets as a as a
15	who who wrote a lot of this material and if	¹⁵ membe	er of The Satanic Temple.
16	it and if it came from somebody who was just	16 Q	Do you know if any member Do you
17	setting up a boilerplate Web site, a you know,	17 know	Strike that.
18	a, quote, unquote, Satanic site for for these	18 D	o any members of The Satanic Temple who
19	purposes or whatever. But it didn't I mean as		d in Arizona as of February 8, 2016
20	far as our concept of our history goes, it didn't	²⁰ Strike	
21	really start until I came in. We We cohered		id any members of The Satanic Temple who
22	the seven tenets, and it wasn't a a film		d in Arizona as of February 8, 2016 adhere
23	project for a couple other individuals.	restae	religious beliefs of The Satanic Temple
24	Q Well, hold on. The The logo identified		lated in Exhibit 27?
25	on Exhibit 27, for instance, the the logo	artica	
23	on Exhibit 27, for instance, the the logo	25 A I	I cannot speak to their to their
	Page 50		Page 52
1		¹ subject	
	A Yes.	546,66	tive state.
2	Q at the top of the page is the logo for		Okay. Did any members of The Satanic
3	which the United Federation of Churches LLC has a		le who resided in Arizona as of February 8,
4	trademark registration. Correct?		adhere to the nine tenets expressed in
5	A That's incorrect. That's a separate logo.		it 28 as opposed to the seven tenets that
6	Q I see.		irrently expressed by The Satanic Temple?
7	The The trademark identified in Exhibit		I assume not because my recollection is at
8	25 for the word mark "The Satanic Temple"		ne we weren't taking membership, but I
9	identifies the date of first use of January 1,		be wrong.
10	2013. Correct?	10 Q	Can I see Exhibit 28 again?
11	A I'm sorry. Which	11 A S	Sure.
12	Q Sure. Exhibit 25	12 (Document handed to Mr. Claus.)
	Q Sure. Exhibit 25		
13	A 25.		IR. CLAUS: Let's go off the record for
13 14	-	13 N	
	 A 25. Q identifies a date of first use 	13 N 14 just a s	IR. CLAUS: Let's go off the record for second, Matt.
14	 A 25. Q identifies a date of first use A Right. Right. 	13 N 14 just a s 15 N	IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right.
14 15	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? 	13 N 14 just a s 15 N 16 (IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.)
14 15 16	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. 	13 N 14 just a s 15 N 16 (17 (IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.)
14 15 16 17 18	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. Q And Exhibit 27 was a publicly accessible 	13 N 14 just a 15 N 16 (17 (18 (IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.) Recess taken.)
14 15 16 17 18 19	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. Q And Exhibit 27 was a publicly accessible Web site using the trademark of The Satanic 	13 N 14 just a 15 N 16 (17 (18 (19 (IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.) Recess taken.) Discussion off the record.)
14 15 16 17 18 19 20	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. Q And Exhibit 27 was a publicly accessible Web site using the trademark of The Satanic Temple as of January 13, 2013. Correct? 	13 N 14 just a s 15 N 16 (17 (18 (19 (20 N	 IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.) Recess taken.) Discussion off the record.) IR. CLAUS: Okay. Back on the record.
14 15 16 17 18 19 20 21	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. Q And Exhibit 27 was a publicly accessible Web site using the trademark of The Satanic Temple as of January 13, 2013. Correct? A Correct. 	13 N 14 just a s 15 N 16 ((17 ((18 () 19 () 20 N 21 Q	 IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.) Recess taken.) Discussion off the record.) IR. CLAUS: Okay. Back on the record. Exhibit 37 is a Don't pack up yet.
14 15 16 17 18 19 20 21 22	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. Q And Exhibit 27 was a publicly accessible Web site using the trademark of The Satanic Temple as of January 13, 2013. Correct? A Correct. Q After the date of first use of The Satanic 	13 N 14 just a 9 15 N 16 (17 (18 (19 (20 N 21 Q 22 A	 IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.) Recess taken.) Discussion off the record.) IR. CLAUS: Okay. Back on the record. Exhibit 37 is a Don't pack up yet. Okay. Well, I
14 15 16 17 18 19 20 21 22 23	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. Q And Exhibit 27 was a publicly accessible Web site using the trademark of The Satanic Temple as of January 13, 2013. Correct? A Correct. Q After the date of first use of The Satanic Temple as applied for by The Satanic by the 	13 N 14 just a s 15 N 16 ((17 ((18 ((19 ((20 N 21 Q 22 A 23 Q	 IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.) Recess taken.) Discussion off the record.) IR. CLAUS: Okay. Back on the record. Exhibit 37 is a Don't pack up yet. Okay. Well, I I don't want you to be distracted.
14 15 16 17 18 19 20 21 22 23 24	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. Q And Exhibit 27 was a publicly accessible Web site using the trademark of The Satanic Temple as of January 13, 2013. Correct? A Correct. Q After the date of first use of The Satanic Temple as applied for by The Satanic by the United Federation of Churches LLC. Correct? 	13 N 14 just a s 15 N 16 ((17 ((18 ((19 ((20 N 21 Q 23 Q 24 A	 IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.) Recess taken.) Discussion off the record.) IR. CLAUS: Okay. Back on the record. Exhibit 37 is a Don't pack up yet. Okay. Well, I I don't want you to be distracted. Just take this out.
14 15 16 17 18 19 20 21 22 23	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. Q And Exhibit 27 was a publicly accessible Web site using the trademark of The Satanic Temple as of January 13, 2013. Correct? A Correct. Q After the date of first use of The Satanic Temple as applied for by The Satanic by the 	13 N 14 just a s 15 N 16 ((17 ((18 ((19 ((20 N 21 Q 23 Q 24 A	 IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.) Recess taken.) Discussion off the record.) IR. CLAUS: Okay. Back on the record. Exhibit 37 is a Don't pack up yet. Okay. Well, I I don't want you to be distracted.
14 15 16 17 18 19 20 21 22 23 24	 A 25. Q identifies a date of first use A Right. Right. Q as January 1, 2013. Correct? A Correct. Q And Exhibit 27 was a publicly accessible Web site using the trademark of The Satanic Temple as of January 13, 2013. Correct? A Correct. Q After the date of first use of The Satanic Temple as applied for by The Satanic by the United Federation of Churches LLC. Correct? 	13 N 14 just a s 15 N 16 ((17 ((18 ((19 ((20 N 21 Q 23 Q 24 A	 IR. CLAUS: Let's go off the record for second, Matt. IR. KEZHAYA: All right. Pause.) Discussion off the record.) Recess taken.) Discussion off the record.) IR. CLAUS: Okay. Back on the record. Exhibit 37 is a Don't pack up yet. Okay. Well, I I don't want you to be distracted. Just take this out.

14 (Pages 50 to 53)

1	February 24 2015 De yeu coe that?	1	Cataniat to become a member of the Asiana
2	February 24, 2015. Do you see that? A Correct. I see that.	2	Satanist to become a member of the Arizona
3		3	chapter of The Satanic Temple?
4	Q And do you see under it says "Join us for an official membership card." Do you see	4	A One must be must self-identify as a Satanist to be chapter head or cochapter head or
5	that?	5	
6		6	media liaison within The Satanic Temple. So to
7	A Here (indicating).	7	have an active leadership role or to act as a
8	Q Yes.		media liaison, we do require that one
	A Correct. Yeah.	8	self-identify as a Satanist.
9	Q Okay. Do you know when membership in The	9	Q But to be a member of the chapter, one
10	Satanic Temple began?	10	needn't be a Satanist. Correct?
11	A I do not.	11	A Depending on the chapter. The chapter may
12	Q Okay. Back to my question, then.	12	accept people who consider themselves allies but
13	Has any member of the Arizona chapter of	13	aren't willing to openly identify as a Satanist.
14	The Satanic Temple ever told you that they do not	14	Q Exhibit 42. This will be my last.
15	adhere to the religious beliefs articulated in	15	A Okay.
16	Exhibit 27 or the nine tenets articulated in	16	MR. KEZHAYA: Give me just a second so I
17	Exhibit 28?	17	can navigate to it.
18	A Michelle Shortt has told me she is a	18	MR. CLAUS: Sure.
19	super is not a supernaturalist, and Michelle	19	MR. KEZHAYA: Okay. You said 42?
20	Shortt is explicitly aware of the seven tenets	20	MR. CLAUS: Yes.
21	and that those form the basis of the beliefs of	21	Q And they're paginated up at the top.
22	The Satanic Temple.	22	A I see.
23	Q Okay. Other than Michelle Shortt, has any	23	MR. KEZHAYA: I'm with you.
24	member of The Satanic Temple who resides in	24	Q It's the Web site of The Satanic Temple
25	Arizona told you explicitly that they do not	25	Arizona. Does the United Federation of Churches
	Page 54		Page 56
1	adhara ta tha raligious baliafa articulatad in	1	LLC surroutly have allow any role in
2	adhere to the religious beliefs articulated in Exhibit 27 or the nine tenets articulated in	2	LLC currently have play any role in editorializing or or an editorial role in the
3	Exhibit 28?	3	
4	A I have had interpersonal communication	4	content of the Web site run by The Satanic Temple of Arizona?
5	with more than I can enumerate off the top of my	5	A Only insofar as if we determine material
6	head from Arizona, but I don't recall any one of	6	placed as content on the Web site to be
7	them specifically citing that material and saying	7	objectionable or outside the purview of what our
8	that they don't believe it.	8	actual beliefs and function are or otherwise
9	Q Okay. Does the United Federation of	9	stands to misrepresent the organization. We can
10	Churches LLC play any role in governing or	10	ask for it to be taken down. We do not
11	determining who may be a member of the Arizona	11	necessarily provide the content, though they're
12	chapter of The Satanic Temple?	12	free to use some of the content, though they re
13	A No. The Arizona chapter is autonomous in	13	•
14	that regard.	14	together as kind of a kind of a cut and paste option.
15		15	•
16	Q Has the United Federation of Churches LLC	16	Q Okay. Last question. Page 6 of Exhibit
17	ever played a role in governing or determining who may be a member of the Arizona chapter of The	17	42.
18	<i>·</i>	18	A Okay. Hang on. I see it.
19	Satanic Temple?	19	Q Still part of the FAQ. Do you see the
20	A No. They're given, by our authority with	20	centered bold type "I am not a Satanist, but I
20	our agreement with them, the autonomy to	20	support what you do. Can I still become an
21	determine membership. We only convene and	21	official chapter member?" Do you see that
22	adjudicate on leadership themselves, chapter	22	question?
23	head, cochapter head and media liaison positions.	23	A Yes.
24	Q As a designee of the United Federation of Churches LLC, do you know if one must be a	24	Q And the answer is "Maybe." Do you see that?
	Charlies LLC, at you know it the must be a		uiat:
	Page 55		Page 57

15 (Pages 54 to 57)

1		1	
1	A Correct.	1	who want to sign up as members and receive the
2	Q That answer is not one of the things over	2	regular newsletter.
3	which the United Federation of Churches LLC	3	Q Okay. Is it Is it a requirement to be
4	decided to exercise editorial control and remove.	4	a TST member that you sign up for the newsletter?
5	Correct?	5	A Well, the newsletter comes when people
6	A Correct.	6	sign up as TST members, and that that's the
7	Q Does reading page 6 of Exhibit 42 refresh	7	way people get the newsletter.
8	your recollection that a nonSatanist may become a	8	Q Okay. Are there TST members who consider
9	member of the Arizona chapter of The Satanic	9	themselves TST members but just don't get the
10	Temple?	10	newsletter because they haven't signed up?
11	A Yes, with the caveat that leadership must	11	MR. CLAUS: Form.
12	be self-identified Satanists. Leadership, media	12	Q Go ahead and answer.
13	liaisons, they they absolutely do have to	13	A It's my understanding that people
14	self-identify with us. But to be a member, you	14	considers [sic] themselves members or otherwise
15	know, to actively engage in the community, we	15	aligned with The Satanic Temple as something that
16	find it you know, we find it acceptable if	16	expresses the beliefs of their religious
17	they accept people who are allies who don't want	17	identity, and they don't necessarily sign up for
18	to self-identify as Satanists.	18	the newsletter or otherwise put themselves into
19	MR. CLAUS: Okay. That's all I have,	19	any database because, my understanding of this,
20	Matt.	20	for the most part people who do that, people who
21	MR. KEZHAYA: All right. Cross	21	stay removed but still consider themselves allied
22	examination on the same Well, let's just	22	on some level These are the types of people
23	present for the record on the on the	23	I've talked to after lectures and things like
24	stipulation that	24	that they do so because they have a certain
25	MR. CLAUS: Hold on a second.	25	distinct fear of of being of being
			distinct real of of being of being
	Page 58		Page 60
1	MR. KEZHAYA: whatever I get into you	1	recognized as as a Satanist.
2	get to recross?	2	Q Is there a social stigma to being
3	MR. CLAUS: Yes, that's correct.	3	recognized as a Satanist?
4	MR. KEZHAYA: Okay. All right. Do we	4	MR. CLAUS: Form.
5	want to take a brief break, or do we want to just	5	A There There generally is a social
6	get back into it?	6	stigma to being recognized as a Satanist.
7	MR. CLAUS: We can get back into it.	7	Q I want to turn your attention to the
8	MR. KEZHAYA: All right.	8	annual reports of the United Federation of
9		9	Churches. The The business purposes includes
10	CROSS EXAMINATION BY MR. KEZHAYA:	10	a catch-all of "all other lawful purposes." Do
11	Q Doug, is it an obligation of members to	11	you remember that?
12	keep their addresses updated with any any form	12	A Correct.
13	of centralized authority?	13	Q Is religious activity a lawful purpose?
14	A It It is not. We do not ask people for	14	MR. CLAUS: Form.
14		15	A Yes. I mean to us that was just a very
15	their address, nor do we ask them to update their	16	
10	addresses.	17	general and vague blanket statement that could encompass all of the activities we were engaged
18	Q Okay. In the regular course of business	18	
18	do y'all maintain addresses	19	in and that we were doing without putting too
	A We do not	20	fine a point on it to make it too narrow.
20	Q again as a	20	Q Okay. In any of the papers filed with the
21	(The reporter requested single voices.)	21	secretary of the commonwealth did TST, by by
22	Q Do you Do you maintain a database of	22	way of United Federation of Churches, ever
23	members?		intentionally mislead the secretary?
24	A We have a a database of members based	24 25	A No, not not not to my understanding.
25	upon the E mail addresses entered for the people	20	Q In the course of TST's operations do you
	Page 59		Page 61

16 (Pages 58 to 61)

1	have voting authority on on decisions for the	1	Q When were those conversations happening
2	United Federation of Churches?	2	between you and Michelle?
3	MR. CLAUS: Form.	3	A Prior to her applying for the Scottsdale
4	A Yes.	4	invocation.
5	Q Is Cevin aware that you from time to time	5	Q Were your Were your dialogues with
6	exercise that voting authority?	6	Cevin, I guess, at the same time?
7	MR. CLAUS: Form.	7	MR. CLAUS: Form.
8	A Yeah, Cevin is aware that I exercise that	8	A It It I'm sorry. At the same time
9	authority on a daily basis.	9	as as what?
10	Q Has he ever threatened you with a breach	10	Q So relative to your conversations with
11	of contract or otherwise taken issue with your	11	Michelle, how much time would pass before you
12	use of your authority?	12	would talk with Cevin about your conversations
13	A No. It's our explicit understanding that	13	with Michelle?
14	I exercise that authority. In fact it's our	14	MR. CLAUS: Form.
15	understanding with each other that we exercise	15	A Typically these dialogues And again of
16	equal authority in that regard.	16	course I don't have exact record on this, but to
17	Q Was Cevin aware that Michelle desired to	17	my recollection it would be within the day that I
18	give this legislative invocation to the City of	18	would speak with Michelle, probably later in the
19	Scottsdale?	19	evening, I would apprise Cevin of the the
20	MR. CLAUS: Form.	20	situation surrounding Michelle's request.
21	A Correct. Cevin was aware that Michelle	21	Q How often do you and Cevin co-ordinate on
22	sought to give the invocation in in	22	TST's activities?
23	Scottsdale.	23	A I would say very often. Certainly not
24	Q But he was aware	24	less than once a week and usually far more often
25	A And he was aware that I	25	than that. It's usually on a daily basis.
	Page 62		Page 64
			¥
1	(The reporter requested single voices)	1	O Okay What What happened with these
1	(The reporter requested single voices.)	1	Q Okay. What What happened with these
2	Q Go ahead and just give me the exact same	2	nine tenets that they became seven tenets?
2 3	Q Go ahead and just give me the exact same answer. That answers my next question as well.	2 3	nine tenets that they became seven tenets? A Well, the that that whole Web site
2	Q Go ahead and just give me the exact same answer. That answers my next question as well. MR. CLAUS: Form.	2 3 4	nine tenets that they became seven tenets? A Well, the that that whole Web site predated me, and I'm not sure who put it up. My
2 3 4 5	 Q Go ahead and just give me the exact same answer. That answers my next question as well. MR. CLAUS: Form. A I'm sorry. Do you want to restate the 	2 3	nine tenets that they became seven tenets? A Well, the that that whole Web site predated me, and I'm not sure who put it up. My understanding is that that was kind of a
2 3 4	 Q Go ahead and just give me the exact same answer. That answers my next question as well. MR. CLAUS: Form. A I'm sorry. Do you want to restate the question? 	2 3 4 5	nine tenets that they became seven tenets? A Well, the that that whole Web site predated me, and I'm not sure who put it up. My understanding is that that was kind of a placeholder site and somebody we had just working
2 3 4 5 6	 Q Go ahead and just give me the exact same answer. That answers my next question as well. MR. CLAUS: Form. A I'm sorry. Do you want to restate the question? Q Let's Let's just take it in two parts. 	2 3 4 5 6	nine tenets that they became seven tenets? A Well, the that that whole Web site predated me, and I'm not sure who put it up. My understanding is that that was kind of a placeholder site and somebody we had just working as a web person put some of the content on there.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Q Go ahead and just give me the exact same answer. That answers my next question as well. MR. CLAUS: Form. A I'm sorry. Do you want to restate the question? Q Let's Let's just take it in two parts. Was Cevin aware that Michelle desired to give a legislative invocation for the City of Scottsdale? MR. CLAUS: Form. A Yes. Through me, as I was the one in dialogue with Michelle Shortt at the time, Cevin was made explicitly aware that Michelle sought to give an invocation in Scottsdale. Q Did he object? MR. CLAUS: Form. A Cevin did not object. In fact he he endorsed he endorsed this. Q Okay. When did this endorsement happen? A I can't give you an exact date. I can 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 nine tenets that they became seven tenets? A Well, the that that whole Web site predated me, and I'm not sure who put it up. My understanding is that that was kind of a placeholder site and somebody we had just working as a web person put some of the content on there. I'm not sure how long some of the old material remained before we got a new Web site together, but the the actual philosophical foundations of The Satanic Temple weren't put in place until until my entry into The Satanic Temple, which kind of made it an entirely new organization even though it had continuity with the URL and and in some of the some of the other paperwork. Q Do you remember about when you you entered into The Satanic Temple? A Sometime in 2013. Q Was it the early part of 2013 or the late late part?
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17 (Pages 62 to 65)

1	idea of The Catanie Temple, and he was sensulting	¹ city where these these where TST wanted
2	idea of The Satanic Temple, and he was consulting me because I am a Satanist. And it wasn't until	
3		give a regislative invocation for .
4	later activities were being done and I was	
4 5	consulting on them that I kind of I kind of	The Withessi Sony.
5 6	overtook the whole thing in certain ways, as it	
	were.	usking an or these questions, hate, but
7	Q Okay. As As of February two	Go uncud. Go uncud. Answer.
8	thousand I guess '16, February 8, 2016, were	⁸ A That was It was Michelle and/or Stu
9	the nine tenets as described earlier a part of	⁹ that approached us with the idea of giving the
10	The Satanic Temple?	¹⁰ invocation in Scottsdale, and I I don't know
11	MR. CLAUS: Form.	the the thinking on their part that preceded
12	A I'm sorry. As of As of what what	¹² that request.
13	date?	¹³ Q Okay.
14	Q February 8, 2016. This is when Michelle	14 MR. KEZHAYA: All right. Well, that
15	first asked for the invocation, I believe.	that answers all of my questions. Do you have
16	A Oh. Correct. By By 2016 that old Web	¹⁶ recross?
17	site material had no relevance to The Satanic	¹⁷ MR. CLAUS: I sure do.
18	Temple as it was at that time.	18
19	Q Okay. And in the deposition of The	¹⁹ REDIRECT EXAMINATION BY MR. CLAUS:
20	Satanic Temple Inc. you had a number as of April	20 Q You testified previously that and just
21	2016 of people in Scottsdale. Do you Do you	²¹ now that you think that the Web page archive
22	have that number still?	shown in Exhibit 27 if you go to Exhibit 27
23	A Yes. As of Let me see. As of April	²³ was, I think, to use your words, a placeholder -
24	2016 and again noting that this is a minimum	A Yeah.
25	known number based upon mailing addresses we	²⁵ Q and that the nine tenets identified in
	Page 66	Page
1	would have had a minimum of five members in	¹ Exhibit 28 was a placeholder?
2	Scottsdale.	² A Sure.
3	Q Okay. Do you have the number as of today	³ Q But you don't know you you don't
4	or at least as of more recently than that?	4 know that. That is your assumption?
5	A Yes. Let me check that. I had it looked	⁵ A Well, how do you how do you mean? As
6	up yesterday.	⁶ opposed to what?
7	(Pause.)	7 Q Has anyone told you that the nine tene
8	A Okay. We have a minimum number now, based	⁸ articulated in Exhibit 28 were simply a
9	upon the criteria I already I already	⁹ placeholder?
10	outlined, of 27 members in Scottsdale.	A ICS.
11	Q Okay. And is that is that as of	11 Q Who?
11 12	Q Okay. And is that is that as of yesterday? Where did this number come from?	11 Q Who? 12 A Cevin Soling.
11 12 13	Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of	 Q Who? A Cevin Soling. Q Okay. When did Cevin Soling tell you
11 12 13 14	Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent	11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that?
11 12 13 14 15	Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to.	11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that
11 12 13 14 15 16	 Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this 	11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of
11 12 13 14 15 16 17	Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this search. Are you searching a a range or as of	11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of 17 revising, you know, the whole perception of The
11 12 13 14 15 16 17 18	Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this search. Are you searching a a range or as of a date?	11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of 17 revising, you know, the whole perception of The 18 Satanic Temple
11 12 13 14 15 16 17 18 19	Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this search. Are you searching a a range or as of a date? A You know, I'm not actually certain. I	11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of 17 revising, you know, the whole perception of The 18 Satanic Temple 19 Q So did Cevin
11 12 13 14 15 16 17 18 19 20	Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this search. Are you searching a a range or as of a date? A You know, I'm not actually certain. I asked the person who does the shipping on these	11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of 17 revising, you know, the whole perception of The 18 Satanic Temple 19 Q So did Cevin 20 A and I wanted to
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11 12 13 14 15 16 17 18 19 20 21 22	 Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this search. Are you searching a a range or as of a date? A You know, I'm not actually certain. I asked the person who does the shipping on these things to do the search, and she just came back with a with a number of 27. 	11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of 17 revising, you know, the whole perception of The 18 Satanic Temple 19 Q So did Cevin 20 A and I wanted to 21 Q I'm sorry. 22 A I I wanted the Web site to reflect
11 12 13 14 15 16 17 18 19 20 21 22 23	 Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this search. Are you searching a a range or as of a date? A You know, I'm not actually certain. I asked the person who does the shipping on these things to do the search, and she just came back with a with a number of 27. Q Okay. All right. 	 11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of 17 revising, you know, the whole perception of The 18 Satanic Temple 19 Q So did Cevin 20 A and I wanted to 21 Q I'm sorry. 22 A I I wanted the Web site to reflect 23 what the beliefs I was willing to advocate
11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this search. Are you searching a a range or as of a date? A You know, I'm not actually certain. I asked the person who does the shipping on these things to do the search, and she just came back with a with a number of 27. Q Okay. All right. (Pause.)	 11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of 17 revising, you know, the whole perception of The 18 Satanic Temple 19 Q So did Cevin 20 A and I wanted to 21 Q I'm sorry. 22 A I I wanted the Web site to reflect 23 what the beliefs I was willing to advocate 24 for. So this this Web site was described as
11 12 13 14 15 16 17 18 19 20 21 22 23	 Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this search. Are you searching a a range or as of a date? A You know, I'm not actually certain. I asked the person who does the shipping on these things to do the search, and she just came back with a with a number of 27. Q Okay. All right. 	 11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of 17 revising, you know, the whole perception of The 18 Satanic Temple 19 Q So did Cevin 20 A and I wanted to 21 Q I'm sorry. 22 A I I wanted the Web site to reflect 23 what the beliefs I was willing to advocate
11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q Okay. And is that is that as of yesterday? Where did this number come from? A This just came from a search of of addresses up 'til now that we've we've sent membership cards and certificates to. Q Tell me a little bit more about this search. Are you searching a a range or as of a date? A You know, I'm not actually certain. I asked the person who does the shipping on these things to do the search, and she just came back with a with a number of 27. Q Okay. All right. (Pause.)	 11 Q Who? 12 A Cevin Soling. 13 Q Okay. When did Cevin Soling tell you 14 that? 15 A I I don't know. He's maintained that 16 from the beginning when I started kind of 17 revising, you know, the whole perception of The 18 Satanic Temple 19 Q So did Cevin 20 A and I wanted to 21 Q I'm sorry. 22 A I I wanted the Web site to reflect 23 what the beliefs I was willing to advocate 24 for. So this this Web site was described as

18 (Pages 66 to 69)

1		1	
1	was working on.	1	Q Do you know if there's been a time
2	Q Did Cevin Soling draft the nine tenets	2	Since you've been associated with The Satanic
3	identified in Exhibit 28?	3	Temple and as the designee for the United
4	A Not that I know of.	4	Federation of Churches LLC, do you know if there
5	Q You testified that as of January 15 in	5	has been a time when a member did not have to pay
6	response to one of my questions, January 15,	6	\$25 to receive a certificate?
7	2013, you didn't believe that The Satanic Temple	7	A If there To receive a certificate?
8	was accepting members. Correct?	8	Q Correct.
9	A I I do not believe so.	9	A So membership doesn't cost anything.
10	Q I'm showing you a Web It is not an	10	Q That wasn't my question.
11	exhibit. We'll make it an exhibit. It will be	11	Do you know of a time when a member did
12	Exhibit 47 a Web page archive from January 15,	12	not have to pay \$25 to receive a certificate?
13	2013 from The Satanic Temple	13	A No. To my knowledge, for somebody to
14	www.thesatanictemple.com, backslash, join. Do	14	receive the card with certificate, they need to
15	you see that?	15	pay for that.
16	A I see that, yes.	16	Q \$25?
17	Q That invites members to join The Satanic	17	A Correct.
18	Temple. Correct?	18	Q It's always been \$25. Correct?
19	A That's correct.	19	A I believe it's always been \$25.
20	MR. KEZHAYA: Object. Wait. You're	20	Q You said Mr. Soling did not object. Was
21	looking at an Exhibit 47. Mine ends at 46.	21	Mr. Soling provided by Michelle Shortt any draft
22	MR. CLAUS: Right. I just said that it's	22	of an invocation Michelle Shortt sought to give?
23		23	
23	not marked yet. We will mark it as Exhibit 47.	24	A Mr. Soling was aware that the invocation
25	It is the Internet archive from January 15, 2013	25	Michelle Shortt sought to give was the same
20	for www.thesatanictemple.com, backslash, join.	25	invocation that I had penned in the Los Angeles
	Page 70		Page 72
1	0 And that Web Color of January 15 2012	1	Time
1	Q And that Web So as of January 15, 2013	1 2	Times.
2 3	members were invited to join The Satanic Temple.	3	Q Let me ask you this, back to what will be
4	Correct?	4	Exhibit 47: Do you know Do you know And
5	A That's That's what it appears from	5	And I mean know such that you could testify under
	here. I'm not This is I mean I have to say	6	penalty of perjury that any of the members of
6 7	this is before this is before my time. Right?		The Satanic Temple who resided in Arizona as of
	This is	7	February 8, 2016 did not use the membership form
8	Q But you are the designee with knowledge.	8	reflected in Exhibit 47?
9	A But this this predates the formation	9	A I I could not do that, no.
10	of of the company and and to my as far	10	Q Okay. Do you know, such that you can
11	as I'm concerned, it predates The Satanic Temple	11	testify under penalty of perjury, that any
12	as as I have a part in it now.	12	members of The Satanic Temple who resided in
13	Q Okay. Do you see	13	Scottsdale did not use the form reflected in the
14	(Telephone interruption.)	14	Internet archive of January 15, 2013 which is
15	(Discussion off the record.)	15	Exhibit 47?
16	MR. CLAUS: So now back on the record.	16	A Well, we know as a matter of fact that
17	Q Do you see how members were invited to	17	we've had members join that are members in
18	join The Satanic Temple and pay a \$25 fee for a	18	Scottsdale well after this Web site in this form
19	certificate on parchment?	19	was active.
20	A That's what I see now. But as I explained	20	Q That wasn't my question.
21	before Matt got cut off or after Matt got cut	21	As of February 8, 2016 do you know if any
22	off, this predated me. I'm not You know, to	22	of the five members who resided in Scottsdale did
23	me this this predates the the form	23	not use the form reflected in Exhibit 47?
24	formalization of The Satanic Temple and what it	24	A Yes.
25	is today.	25	Q How many?
1	is today.		
	is today.		
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19 (Pages 70 to 73)

1	A Let me see. We know that between	1	Q Do you know if engaging in religious
2	between February and April of 2016 we had five	2	activities is a law was a lawful activity
3	members sign up from Scottsdale. So they would	3	under chapter 156 of the Massachusetts General
4	have been in they would have been on the on	4	Laws as of February 8, 2016?
5	the current Web site, not this	5	A As opposed to illegal?
6	Q Well, hold on a second.	6	Q Well, do you know if engaging in a
7	So between February and April of 2016 five	7	religious activity by a limited liability company
8	members who resided in Scottsdale signed up. Is	8	was a lawfully permitted activity of a limited
9	that what you testified to?	9	liability company under Massachusetts General Law
10	A Correct. Yeah.	10	156C as of February 8, 2016?
11	Q So I'm asking you as of February 8, that	11	A I'm sorry. That's a question I never
12	date	12	thought to ask because I never thought there
13	A Uh-huh.	13	could be any any question that that would be
14	Q as of February 8, 2016, do you know if	14	lawful.
15	any members of The Satanic Temple resided in the	15	Q Okay. So does the answer, then You
16	City of Scottsdale?	16	don't know?
17	A As of February 8th if any members resided	17	A Correct.
18	in Scottsdale.	18	Q You were asked about whether you had
19	Q Correct.	19	breached a contract or been threatened with a
20	A I I cannot say that with certainty.	20	breach of contract lawsuit. Are there any
21	Q Okay. As of February 8, 2016, that date,	21	written contracts between the United Federation
22	did any members of The Satanic Temple who resided	22	of Churches LLC and you whereby you are conferred
23	in Scottsdale utilize the form reflected in	23	the authority to act as a manager or agent of
24	Exhibit 47? Do you know?	24	that entity?
25	A I do not know, and I do not know if we	25	A Well, we just looked at I'm I'm
	Page 74		Page 76
1	kept record of any of the people who signed up on	1	defined as resident agent, I think we saw in the
2	this form at all so	2	documentation.
3	Q Okay.	3	Q I'm asking you about contracts. Are there
4	A it's just I just don't know.	4	any written agreements supported by consideration
5	Q And as of February 8, 2016 do you know,	5	where you are authorized to act as anything other
6	such that you can testify under penalty of	6	than a resident agent of the United Federation of
7	perjury, that any members of The Satanic Temple	7	Churches LLC?
8	who resided in Arizona did not adhere to the nine	8	A Not that I can recall.
9	tenets reflected in Exhibit 28?	9	Q Do you know for a fact that Mr. Soling
10	(Pause.)	10	Such that you could testify under penalty of
11	A Not at the moment, not at the immediate	11	perjury, do you know for a fact that you informed
12	moment, but we could do a search for everybody	12	Mr. Soling of Michelle Shortt's desire to give an
13	who signed up post this Web site up and to that	13	invocation before a City of Scottsdale Council
14	date.	14	meeting prior to February 8, 2016?
15	Q But you haven't done that to prepare for	15	A Was Now, to clarify, was February 8th,
16	your deposition today.	16	2016 supposed to be the date that the invocation
17	A I I do not have that.	17	would be delivered?
18	Q Okay. You were asked if The Satanic	18	Q That's just the date I'm using for my
19	You were asked if United Federation of Churches	19	question.
20	LLC maintains a database of addresses, and you	20	So do you know if prior to February 8,
21	were asked about the TST member newsletter. Does	21	2016 Such that you could testify under penalty
22	the United Federation of Churches LLC publish the	22	of perjury, do you know that prior to that date
23	TST member newsletter?	23	you informed Mr. Soling of Michelle Shortt's
24	A I do not know that the newsletter has been	24	desire to give an invocation before a City of
25	given explicit corporate entity ownership.	25	Scottsdale Council meeting?
	Jan and a second and a second and a second a		
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20 (Pages 74 to 77)

1	A Given my deficiency on recollecting dates,	1	Q Like did you sign the operating agreement?
2	all I can say is that Mr. Soling was informed, as	2	A Yes, it's my understanding that I did.
3 4	I was being informed, through me that this was in	3	Q Did you sign it as a member?
4 5	process, that Michelle wanted to give the	5	A For the LLC. I'm I'm a member.
6	invocation in Scottsdale.	6	Q Yes.
7	Q When in time did you inform Mr. Soling	7	A Yes.
8	that Michelle Shortt was going to request the ability from the City of Scottsdale to give an	8	Q Okay. And so to to clarify, you signed
9	invocation prior to a City of Scottsdale to give an	9	the operating agreement for United Federation of Churches LLC as a member of that LLC. Right?
10	meeting?	10	A Correct.
11	A I can give you proximity within events	11	Q Okay.
12	that happened between Michelle and I by which I	12	MR. KEZHAYA: That's all I got.
13	would say that I would speak to Mr. Soling within	13	
14	the day of having spoken to Michelle about	14	FURTHER REDIRECT EXAMINATION BY MR. CLAUS:
15	requesting to give an invocation in Scottsdale.	15	Q And you're sure of that under penalty of
16	Q But you cannot give me a date?	16	perjury?
17	A Correct. Yeah, I can I cannot.	17	A Yes. Yes.
18	Q Then you said "Michelle and Stu approached	18	Q And do you know when that happened?
19	us." Is it accurate to say that the United	19	A No. I'm I'm not good at that.
20	Federation of Churches LLC never made a decision	20	Q Okay.
21	as an organization to ask Michelle Shortt to	21	MR. CLAUS: Do you want to read and sign?
22	speak on its behalf in the State of Arizona?	22	MR. KEZHAYA: Yeah. Same Same thing,
23	A It would be accurate to say we gave	23	Doug. We read and sign. We get it back to the
24	permission to Michelle to speak on behalf of our	24	court reporter inside of 30 days.
25	beliefs in Scottsdale.	25	THE WITNESS: I'm sorry.
	D 70		D 00
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1	Q That wasn't my question.	1	MR. KEZHAYA: Okay.
2	My question is is it accurate to say that	2	THE WITNESS: We do the transcripts once
3	the United Federation of Churches LLC never asked	3	it's available. Right? Okay.
4	Michelle Shortt to act as its spokesperson in the	4	MR. KEZHAYA: Yeah. So we're going to
5	State of Arizona?	5	We're off the record. Right?
6	A I I'm having a little trouble	6	MR. CLAUS: Yes, let's go off the record.
7	understanding the distinction because the	7	(Discussion off the record.)
8	request the idea originated from Arizona. So	8	(The proceedings adjourned at 1:01 PM.)
9	if the question is did we reach out to Arizona	9	(Exhibits Numbers 7, 10, 11, 12, 13, 14,
10	and request that they represent us in Scottsdale,	10	15, 16, 27, 28, 37, 42 and 47 marked for
11	the answer is no. It was the other way round.	11	identification.)
12	Q Great.	12	
13	MR. CLAUS: That's all I have.	13	
14	MR. KEZHAYA: Okay. I have I have one	14	
15	final question.	15	
16		16 17	
17	RECROSS EXAMINATION BY MR. KEZHAYA:		
18	Q Doug, are you Actually I have I have	18	
19	Q Doug, are you Actually I have I have one final topic that may be multiple questions.	18 19	
19 20	Q Doug, are you Actually I have I have one final topic that may be multiple questions. Doug, United Federation of Churches has an	18 19 20	
19 20 21	Q Doug, are you Actually I have I have one final topic that may be multiple questions. Doug, United Federation of Churches has an operating agreement. Right?	18 19 20 21	
19 20 21 22	Q Doug, are you Actually I have I have one final topic that may be multiple questions. Doug, United Federation of Churches has an operating agreement. Right? A Yes.	18 19 20 21 22	
19 20 21 22 23	 Q Doug, are you Actually I have I have one final topic that may be multiple questions. Doug, United Federation of Churches has an operating agreement. Right? A Yes. Q Are you a party to that operating 	18 19 20 21	
19 20 21 22 23 24	 Q Doug, are you Actually I have I have one final topic that may be multiple questions. Doug, United Federation of Churches has an operating agreement. Right? A Yes. Q Are you a party to that operating agreement? 	18 19 20 21 22 23	
19 20 21 22 23	 Q Doug, are you Actually I have I have one final topic that may be multiple questions. Doug, United Federation of Churches has an operating agreement. Right? A Yes. Q Are you a party to that operating 	18 19 20 21 22 23 24	
19 20 21 22 23 24	 Q Doug, are you Actually I have I have one final topic that may be multiple questions. Doug, United Federation of Churches has an operating agreement. Right? A Yes. Q Are you a party to that operating agreement? 	18 19 20 21 22 23 24	Page 81

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STATE OF)
) ss.
COUNTY OF)
I, DOUGLAS ALEXANDER MISICKO, a witness called to
testify in the matter of SATANIC TEMPLE ET AL.
vs. CITY OF SCOTTSDALE ET AL., do hereby certify
under penalty of perjury that I have read the foregoing transcript and have made any
corrections, additions or deletions that I was
desirous of making; and that the foregoing is a
true and accurate record of my testimony therein.
Signed by me on the day of
20 at
20 at, (City) (State)
DOUGLAS ALEXANDER MISICKO
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COMMONWEALTH OF MASSACHUSETTS
COUNTY OF SUFFOLK
I, Lawrence A. Brown, Certified Shorthand
Reporter Number 1430F96, Registered Professional
Reporter and Notary Public in and for the
Commonwealth of Massachusetts, do hereby certify
that the foregoing transcript of the proceedings
therein described is a complete and accurate
record of same to my best knowledge and belief
and that the deponent requested review of the
transcript.
I further cortifie that I am not related to
I further certify that I am not related to
or employed by any party in or counsel to this
matter and that I am not financially interested
in its outcome.
In withood whereast I have write and any have
In witness whereof, I hereunto set my hand
on the 26th day of September 2019.
Louronce A. Brown, Notory, Dublic
Lawrence A. Brown, Notary Public
Lawrence A. Brown, Notary Public My commission expires July 2, 2021

22 (Pages 82 to 83)

				
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