

EXHIBIT 2

Relevant excerpts of TST's deposition

1 And, therefore, on the -- I believe on the press
2 release and in the subsequent interviews I did, I was
3 quite clear on the fact that we still weren't advocating
4 for any supernatural beliefs or even a belief in the
5 afterlife.

6 But what we were doing is directly engaging the
7 Westboro Baptist Church on their own terms. They had made
8 the argument before in the Supreme Court that their
9 beliefs were inviolable. And we were making the argument
10 also that our beliefs were inviolable; and we were free
11 to believe that they were obligated to believe, based
12 upon their beliefs, that we had changed the sexual
13 orientation of Catherine Idalette Johnston.

14 THE COURT REPORTER: "The sexual
15 orientation" of?

16 THE WITNESS: Of Catherine Idalette
17 Johnston.

18 Q. So what did the Pink Mass involve?

19 A. Two same-sex couples making out over the grave of
20 the mother of the founder of the Westboro Baptist Church.
21 And then I tastefully rested my scrotum upon her grave.

22 Q. Okay. The two men who were photographed kissing,
23 they were actors; right?

24 A. Well, they were definitely kissing.

25 Q. Right.

1 But they were hired actors, correct?

2 A. I don't believe they were paid.

3 Q. In any case, they were actors who were actually
4 kissing?

5 A. I don't -- I wouldn't call them actors. They --
6 they knew what we were doing, and they wanted to do it.

7 Q. And those two men were not actually gay, were they?

8 A. I don't -- I don't know. I don't -- I -- I know at
9 least one of them explicitly identified as gay. The other
10 one seemed pretty gay along with him.

11 Q. So you had tried to find actors to participate in
12 this, what you called the Pink Mass; correct?

13 A. I did not.

14 I don't know necessarily what the process was when
15 the people I was working with were trying to find people.

16 Q. And I say "you." I mean The Satanic Temple.

17 A. Well, this was still kind of transitioning from
18 film project to -- this is about the point where my face
19 ended up in the news quite a bit where --

20 Q. Let me --

21 A. -- they really insisted on --

22 Q. Let me stop you there now, if you don't mind.

23 A. Okay.

24 Q. So there were also two women who were photographed
25 kissing, correct?

1 A. Correct.

2 Q. And they were not actually lesbian, correct?

3 A. I actually really know nothing about either of
4 them.

5 Q. But you know that they weren't lesbian?

6 A. I don't know that. They --

7 Q. And they were --

8 A. -- could very well have been.

9 Q. -- actors as well, right?

10 A. I -- I don't know that either.

11 I -- I don't -- I don't believe any of these people
12 got paid, and I believe they -- they had their own --
13 their own -- their own positions on matters that led them
14 to want to do this with us.

15 Q. How did you locate these individuals to
16 participate?

17 A. I -- I did not. So I didn't --

18 Q. How did The Satanic Temple locate these
19 individuals?

20 A. I -- I do not know how these, these people were --
21 were brought into this.

22 Q. Okay. And -- and you are the representative of The
23 Satanic Temple with knowledge of the items listed in the
24 Notice of Deposition, correct?

25 A. Yeah.

1 cofounder later on.

2 Q. How about you and Cevin? Do you receive a salary or
3 compensation?

4 A. No, we don't receive regular compensation.

5 Q. You don't receive a regular salary? Or you don't
6 receive --

7 A. Correct. I mean, we do not.

8 Q. Okay. How do you make your life -- well, I'll
9 ask -- I'll ask that another time.

10 How -- how does The Satanic Temple -- how does the
11 Satanic Temple compensate the managers? So Cevin
12 Soling -- excuse me -- Malcolm Jarry, and yourself?

13 A. There -- there is no regular set compensation,
14 salary, or anything like that.

15 I haven't taken income from The Satanic Temple in
16 probably, like, four months now.

17 Q. So formerly you took an income?

18 A. Some -- sometimes to pay rent and that kind of
19 thing. It wasn't like -- there -- never more than \$2,000
20 a month.

21 Q. Does The Satanic Temple pay for its managers'
22 business expenses?

23 A. Oh, well, yes. Like -- like, if you're talking
24 about, like, flying to Arkansas and -- and different
25 Satanic Temple related business, yeah. I use the -- The

1 Satanic Temple card on all of that.

2 Q. Okay. So what all of business expenses does Satanic
3 Temple pay for?

4 A. Are you able to narrow this down at all?

5 Q. Well, sure. Say, take housing.

6 A. No. Well, I mean, if you consider having taken
7 payment that goes towards rent, then -- then yes. But
8 there is no set protocol within our standards that --
9 that -- in which The Satanic Temple automatically pays
10 monthly my rent.

11 Q. Okay. So do you take dividends? Or anything of that
12 nature?

13 A. No. I just stay afloat.

14 Q. You stay afloat?

15 A. Correct.

16 Q. Okay. So I take -- how does this work? Do you
17 and -- and Malcolm get together and decide what -- what
18 is to be done? How things are to be paid? What income is
19 to be paid out? What compensation is to be made?

20 A. I -- I never -- I never sat with him and agreed
21 upon a salary for the manager of -- of Salem or the
22 part-time employees, so that's -- that's been within his
23 purview. I'm not sure what -- what their actual -- what
24 their actual payments are.

25 Q. So when you received an income, was the same income

1 paid to both managers?

2 A. No.

3 Q. Okay. What was the difference in the payment based
4 on?

5 A. I -- I -- I don't know that -- I mean, I know
6 Malcolm has his own streams of revenue. And The Satanic
7 Temple has generally not generated revenue, so I don't
8 know that he's taken payments or not.

9 MR. CANTRELL: All right. Well, let's take
10 a short break; and then we'll come back.

11 MR. BAKER: How short?

12 MR. CANTRELL: How short?

13 MR. BAKER: Yeah.

14 MR. KEZHAYA: We've got another hour on
15 there.

16 MR. BAKER: Yeah, I'm ready to get home. I
17 don't want to take too . . .

18 MR. CANTRELL: Yeah. Yes, brief break.

19 THE VIDEOGRAPHER: We're going off the
20 record at 5:11 p.m.

21 (Recess taken.)

22 THE VIDEOGRAPHER: We are back on the
23 record at 5:19 p.m.

24 MR. CANTRELL: Okay. Just a few more
25 questions.