

EXHIBIT 2

In the Matter Of:

THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

1:22-cv-01343-MKV

GREGORY STEVENS

November 03, 2023

30B6



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science in the energy sector in Texas.

Q. What was the name of that second company?

A. Let's see. So the retail branch was TXU Energy, and I am blacking out on the name of the umbrella company. I'm going to go with TXU Energy Company.

Q. That's fine. By the way, when I ask you questions, I'm asking for your best recollection. I don't want you to speculate or guess, and if you don't know the answer to something, you can say I don't know.

A. Okay. Thank you.

Q. Then you said I think in about 2018 you became a full-time Satanist?

A. Yes.

Q. Tell me about that. You joined The Satanic Temple, is that correct, in 2018?

A. No. I joined The Satanic Temple much prior to that, and I was doing volunteer work for them for a long time. I had started with The Satanic Temple. I had started doing, I joined Satanic Temple in 2015, and then early 2016 Doug asked me to be on this new group they were

1 Stevens

2 forming at the time, the national council, which
3 was supposed to, the goal was we have all these
4 chapters in different places, and it was clear
5 that things were going fast enough that they
6 needed a body to help manage them, and so the
7 national, the purpose of the national council was
8 to deal with requests for formation of new
9 groups, managing, approving, reviewing activities
10 by groups as well as hearing complaints and
11 hearing concerns, issues that were brought
12 forward by groups.

13 So that was all, national council was
14 the group that we had a complaint form for any
15 members that, you know, had an issue that they
16 were not able to deal with within their own local
17 group.

18 So I was part of that from 2015 until
19 about let's say 2018, and I took a little break
20 from that, but then it wasn't until, I was going
21 through some personal difficulties and separation
22 and everything from my marriage, and so I was
23 like, well, I quit my corporate job, and I was
24 like I am going to, I've been for several years
25 now doing stuff for The Satanic Temple, I'm going

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2 to work on projects full time for The Satanic
3 Temple, and that was when I started working on
4 the ordination program, which we ended up
5 launching a couple of years later and other
6 miscellaneous projects as well.

7 So then now and ever since 2020 I
8 will say we launched an ordination program, and
9 my role has been the director of ministry and
10 having been central to the creation of the
11 ordination program and sort of launching that,
12 ramping that up and also being the head of the
13 team now that manages the ordination council that
14 manages the ordination of new ministers as well
15 as management, and so, although we officially,
16 our group doesn't decide upon complaints, we have
17 a separate group for that in the organization.
18 It is no longer the national council. There was
19 a restructuring.

20 So there's an actual group that is
21 dedicated called the Suryan Council that is
22 dedicated to hearing complaints about the
23 violation of code of conduct, which the matters
24 on Schedule A would fall under violations of code
25 of conduct, and there is another group, the

1 Stevens

2 concerns committee, that hears, receives
3 complaints about investigates and adjudicates
4 matters that are not violations of the code of
5 conduct, but still, you know, things when people
6 have a concern about something, whether it's
7 someone in a position with responsibility not
8 doing their job, stuff that is not a violation of
9 code of conduct, but other complaints, so this is
10 all a product of the rapid growth.

11 There was a point in about 2020 when,
12 2021, when having a single body, the national
13 council, to do all the things we realized wasn't
14 going to work anymore. So we started a
15 restructuring, and that's when we got the Suryan
16 Council, and then the national council was
17 finally dissolved and replaced with a governing
18 system for the congregations that's basically a
19 collection of committees instead of having a
20 single thing.

21 Again, this is all in the service of
22 dealing with the rapid growth, and in that
23 committee is the administrative committee,
24 legislative committee and then the concerns
25 committee. That's the other one, so now the

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2 ordination council which I as the director of
3 ministry and the head of we are tasked with
4 investigating complaints. Two groups that are
5 tasked with investigating complaints are the
6 Suryan Council and the concerns committee, but,
7 if they get reported a complaint and do an
8 investigation, anything that concerns a minister,
9 because that is sort of our, you know, bailiwick
10 as it were, they will let us know like, hey, we
11 have done this investigation, here is the sort of
12 top-level report, and, regardless of their
13 determination of whether some other remedy, you
14 know, is appropriate for the congregations or the
15 administrative side of it they are like here are
16 the facts.

17 So then our council can decide do we
18 think some sort of remedy on the ministerial side
19 of it, because it's possible someone, maybe what
20 they did was not rising to the level of them
21 being removed from leadership position, but maybe
22 we don't want them to be a minister anymore.
23 These are separate determinations. So they would
24 pass the information to us.

25 So it, as a consequence between me

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having been on the national council from 2015 to 2018 and a little break but being the director of ministry, I'm in a position to have heard a lot of the things, right, and also seen firsthand the evolution over time of sort of how what our processes have been for dealing with them. That answered more than your question I think.

Q. It's very helpful, and you have answered a lot of other questions I was going to ask you. Let me just get a few things clarified. When you were head of the national council --

A. I was on the national council. I was not the head of the national council. I was on the national council.

Q. Got it. That was from 2015 to 2018?

A. I would say yes.

Q. Was that a paid position?

A. No.

Q. Then you said you left for a short period of time, but then you came back in 2019 as the director of ministry. Is that correct?

A. Yes. My only hesitation is I didn't leave. I left that group.

Q. You never left the temple. You were

1 Stevens

2 the documentation, but that's all done through
3 forms that are submitted and then communications
4 with the ordination council and the ministers.

5 If a congregation and I mentioned
6 before the concerns committee, if the sort of
7 communication you are talking about is a member
8 who believes that their congregation head is
9 incompetent or lazy or not doing their job, I'm
10 specifically picking something that is not a code
11 of conduct violation, this is just a problem,
12 they would submit that using a form to the
13 concerns committee. That's another kind of
14 communication.

15 If they wanted to do a big event,
16 they would submit an event proposal to the
17 regional committee, which would then most likely
18 be either approved if it's a standard thing, if
19 it's an event that everyone always does, if they
20 have a booth at a pride festival, okay, but, if
21 it's anything more complex than that, it gets
22 sent up to the administrative committee. So it
23 really depends on the type of communication.

24 Q. Let's take another example. What if
25 there's an allegation of sexual assault within a

1 Stevens

2 congregation and let's say it doesn't involve the
3 minister, but it involves another member in that
4 congregation? How would that get handled and
5 reported?

6 A. Regardless of whether it does or
7 doesn't involve any of these things, that's
8 handled by the Suryan Council, and so the Suryan
9 Council has a form that we put a lot of effort
10 into making sure all of our members are aware of
11 and realize like, hey, anyone, you don't need to
12 be in leadership. You can use this form. You
13 don't even need to be an official member of a
14 congregation. If you had an interaction with
15 someone, like anyone can use this form.

16 We also make a point of if internally
17 if someone reports something to the concerns
18 committee, but like, you know, some of them don't
19 necessarily know, but or they feel like they just
20 remember the concerns committee, they don't
21 remember the other one, if the concerns committee
22 receives a report of something like sexual
23 assault, immediately they refer it over to the
24 Suryan Council.

25 If someone feels very comfortable

1 Stevens

2 Exhibit 7?

3 A. Yes.

4 Q. And you see the response there from
5 Enid Cooper that was forwarded by Stuart de Haan?

6 A. Um-hum.

7 Q. Do you know who Enid Cooper is?

8 A. No. I have a vague memory of,
9 unfortunately I have a vague memory, and I don't
10 think, I can't say for certain if I was involved
11 in seeing this e-mail thread in realtime, and I
12 just heard about it. Honestly I can't remember,
13 but my impression was that there was Enid Cooper
14 had made some complaints to national council and
15 then was being very, very aggressive in not
16 leaving, what are you going to do about it, what
17 are you going to do about it, what are you going
18 to do about it, repeatedly and very quickly, and
19 that that led to some frustration because it's
20 like you never want to tell somebody who is
21 filing a complaint like to not, but I think Enid
22 even does say something like just shut up or
23 whatever.

24 Like you don't want to come across
25 that way, but at the same time sometimes looking

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into things takes time, and Enid Cooper was not having I guess any of that.

Q. So let's mark before you continue, let's mark as Exhibit 9 because this is the actual complaint from Enid, and I apologize it's out of order, but that's the way it was numbered.

A. Excellent.

(Defendant's Exhibit 9, Document Bates stamped TST 89.0001 through 89.0003, was so marked for identification, as of this date.)

A. Oh, yeah, this goes back to 2017.

Q. Yes.

A. I was definitely on the council. That's why I'm remembering this.

Q. I marked Bates number 89 as Exhibit 9, and you see this is an e-mail from Enid Cooper regarding abuse going on in the San Jose, California chapter?

A. Yeah.

Q. You see she is complaining about the head, one of the leaders, Gus Hernandez, this is the second paragraph of her complaint, and among the complaints she raises, and I'm quoting is

1 Stevens

2 after this complaint was filed?

3 A. He was removed from the Arizona
4 chapter.

5 Q. How do you know that?

6 A. Not through documentation. I know
7 that informally, because I had heard through
8 friends that Wonka was mad, but decided to take a
9 break from TST in general and like I don't even,
10 and like work on his artwork. It was all through
11 informal conversations. It wasn't through
12 announcement, but it was because of knowing
13 people in the area having heard like, yes, Wonka
14 is no longer part of the group.

15 Q. Okay, but there was no formal kind of
16 investigation or formal resolution that would be
17 documented, filed, correct, or else we would have
18 it?

19 A. Or you would have it. I will
20 reiterate what I said earlier. That it was
21 around 2020 with the formation of Suryan Council
22 that we realized that we needed a lot more
23 standardized -- when we started having a lot more
24 standardized like always having a particular
25 format summary of resolution of things, outcome

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of the investigation type things, and this was prior to that. So you would have it if a formal thing like that existed.

Q. So there were a lot of kind of informal complaints that were not formally dealt with, is that correct, during this time period?

A. Say that one more time.

Q. There were a lot of informal complaints that were not formally dealt with during this time period. Is that correct?

A. I think that's accurate.

MR. STRACHER: Let's mark this as Exhibit 11.

(Defendant's Exhibit 11, Document Bates stamped TST 91.0001 and 91.0002, was so marked for identification, as of this date.)

Q. Marked as Exhibit 11 a document Bates number 91. Do you recognize this document?

A. I do.

Q. What is it?

A. What is it? Well, this is, give me a moment. I'm scanning to review it because I recognize it. I just want to remind myself. So

1 Stevens

2 nature, you want me to give you a high level
3 summary?

4 Q. Yeah, that would be great, based on
5 your record or your recollection.

6 A. Some of this is indirect knowledge.
7 Some of it is because, although I wasn't at this
8 time on the national council or anything when it
9 first started, I know Shelby and I know other
10 members of Austin fairly well. Yeah.

11 Conversations with people who were involved as
12 well. So Kiley started making claims about
13 Shelby. If you don't mind, I will actually refer
14 back to my document because I am bad with dates.

15 Q. Sure.

16 A. Kiley started making claims about
17 Shelby, and it was actually earlier than April
18 2020 sort of informally that some of these claims
19 were being made and even shared online that seem
20 to be sort of an effort to draw other people in
21 to, you know, quote warn people and let people
22 know unquote about Shelby before even an official
23 complaint was filed.

24 Then on or about in April of 2020 was
25 when, not Kiley, but an ex of Shelby's who also

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was friends with Kiley e-mailed the national council with the allegation that Shelby had sexually assaulted Kiley. So the allegation was that Shelby sexually assaulted Kiley. The report was e-mailed in by a person who was a friend of Kiley's and an ex of Shelby's.

National council's first response was to encourage Kiley to file a police report, but she said she was not going to do that. Over the course of the following month or so, I'm trying to think of a good neutral way of phrasing this, because I don't want to sound like I'm making any accusations one way or the other, but it seemed like there was a lot of effort to reach out to people, TST members individually, to, you know, warn people, sway people, whatever language you want to use, right, about this.

Q. By who?

A. By friends of Kiley's or friends of Laura's, and it got to the point where someone, it was Laura, threatened to go public quote unquote, whatever that means, with the claim that TST was covering up these accusations, and it was at that point that Shelby stepped down.

1 Stevens

2 So Shelby had no interest in either
3 being, having TST being used as something that
4 could hurt him or him being used to hurt TST. So
5 he resigned. At that point, he sent in a notice
6 to national council saying he was resigning as
7 chapter head, who is leaving the congregation,
8 completely stepping aside.

9 Finally, so in the following month
10 after that, Laura Smith again, so remember Kiley
11 was encouraged by national council please file a
12 police report. It was the following month that
13 Laura filed a police report with Austin PD on
14 behalf of Kiley.

15 Q. Laura filed it on behalf of Kiley?

16 A. Correct.

17 Q. Okay.

18 A. And this added some -- at that point,
19 national council already felt very like, you
20 know, this is serious enough that something more
21 serious should be done than what they have the
22 power to do. So, you know, on the one hand,
23 first of all, it made it easier that Shelby steps
24 down, but they were also sort of it was a good
25 thing that it was filed as a police report,

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because at that point, okay, this is how it's being handled by the people who actually have the expertise and power to do what needs to be done here.

It was sort of felt over their heads as it were, and so at that point national council, you know, and they also were aware that Shelby was cooperating with the police. So the national council didn't do any investigation after that point, because, if the police are already investigating it, it is counterproductive. You don't want two investigations going on at the same time.

So a lot of things, I shouldn't laugh, but, as you can see in Exhibit 18, a lot of things transpired subsequent to that, but the end result was that, and again, if I'm here testifying from the point of view of TST, our contact with this situation ended at the point where we were informed that Shelby wasn't part of Austin. There was a police report that had been filed.

So there was another party that was actually actively investigating this, and so, and

1 Stevens

2 even there was a point when the national council
3 advised that like, you know, the congregation if
4 you see stuff because there was so much stuff
5 going on online, there was so much like people
6 talking, you know, making accusations online and
7 all this stuff, and so there was urging messages
8 to leadership like please don't get involved,
9 please don't respond, please don't argue back,
10 just please, please, and then at one point I
11 don't know exactly when this was, but the people,
12 you know, like Laura because of the fact that
13 every single, every single meeting in the
14 congregation there was a lot of just constantly
15 turning attention to themselves and to this and,
16 hey, did you hear that Shelby, just constant, and
17 it made it impossible for them to have meetings,
18 and so they ended up making the decision to
19 remove everybody, anybody who was involved in any
20 side of the case, right, just anybody who was
21 currently a part of the police investigation, we
22 just please take some time, please take some
23 time, and they were no longer part of Austin.

24 So yeah. That's really, like I said,
25 I'm speaking from the point of view of TST at the

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point where Shelby stepped down and national knew that there was police work going on, so there was no more national interest in it, because like this is being handled. Shelby is no longer a part of this, and then from the point of view of the congregation itself when eventually they said, hey, for our members' comfort and safety, anybody involved in the investigation based on their behavior, and they're being removed, this became no longer a TST thing even though there's obviously --

Q. A lot of stuff about it?

A. Stuff that happened since then.

Q. Yeah. Okay. What result, if you know, became of the police investigation of Shelby?

A. They dropped the case.

Q. And Shelby resigned you said from TST. Is that right?

A. He resigned from being in leadership and a member of the congregation. I think he still considered him himself a member of TST generally, but yeah.

Q. And what about Kiley? What happened

1 Stevens

2 to her vis-à-vis TST?

3 A. I don't know.

4 Q. So let's mark this as Exhibit 19.

5 (Defendant's Exhibit 19, Document
6 Bates stamped TST 430, was so marked for
7 identification, as of this date.)

8 Q. I just marked Exhibit 19 a document
9 Bates numbered TST 430. Do you recognize this
10 document?

11 A. I do not.

12 Q. I'll represent to you this was
13 produced by the Plaintiff in this lawsuit in
14 response to Newsweek's document request.

15 A. Okay.

16 Q. Do you see the reference in that
17 document to being banned from TST for filing a
18 report about a member of leadership in TST raping
19 them?

20 A. I see the sentence you're referring
21 to.

22 Q. Do you know whether Kiley was banned
23 from TST?

24 A. I know for a fact that Kiley was not.

25 Q. She was not banned. How do you know

1 Stevens

2 for a fact?

3 A. Because -- how do I know for a fact?
4 Because I know that Kiley was removed from the
5 congregation by the decision of the congregation
6 for the reasons I just gave a moment ago.

7 Q. Kiley was removed, or Shelby was
8 removed?

9 A. Shelby stepped down.

10 Q. Okay, but Kiley was removed you're
11 saying?

12 A. What I'm saying was that at some
13 point after Shelby stepped down, the people who
14 were in charge in the months that followed the
15 people who were accusing Shelby were
16 participating in so much disruptive behavior in
17 the congregation that the congregation made the
18 decision that they wanted to remove from the
19 congregation anyone involved in any side that
20 said we're not taking sides, you know, in this
21 ongoing police investigation.

22 They say in there, if I remember
23 correctly in their announcement they specifically
24 said, one, we're not taking sides, and, two, this
25 doesn't mean you're banned from TST. I might be

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misremembering, but I'm pretty sure they actually said that. It was removed from the congregation with an option to apply within a year, if they still wanted to, you know, after some time to have some separation from everything and cool off. That was how it was presented.

So I know for a fact that, assuming, I do not see names in here, so I don't even know, but, if I am to presume that this statement is even about either Kiley or someone else related to this, if I presume that, I know it's not true. I know it's false.

Q. Okay.

(Defendant's Exhibit 20, Document Bates stamped TST 436, was so marked for identification, as of this date.)

(Recess taken from 1:57 p.m. to 2:05 p.m.)

BY MR. STRACHER:

Q. If you could look at Exhibit 20 now, do you recognize Exhibit 20?

A. Are you asking me if I've seen it before?

Q. Yes.

1 Stevens

2 A. I want to say something else that's
3 problematic about this particular exhibit. In
4 addition to not knowing who it's to or where it's
5 from or whatever, this matter, it isn't even
6 clear what this matter on the first line is
7 referring to, and the reason I say that is
8 because the first line of this reads, "Saying
9 that you and blank should have personally handled
10 this matter is very problematic as you were
11 already aware at the time that blank that forced
12 himself sexually onto Kiley."

13 Now, if that was something that was
14 in the past, are they saying that that was a
15 separate incident from this matter? What is this
16 matter?

17 Q. No.

18 A. Like it's not clear to me whether
19 this matter is referring to that thing or whether
20 this is now a point of reference saying there was
21 this other thing that already happened, and now
22 this matter happened? It just is very unclear.

23 Q. Do you know who Jex Blackmore is?

24 A. Yes, I do.

25 Q. Let me mark this as Exhibit 23.

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(Defendant's Exhibit 23, Document
Bates stamped TST 105.0001 through
105.0010, was so marked for
identification, as of this date.)

Q. Who is Jex Blackmore?

A. Jex Blackmore was one of the -- was a
very, very early-on member of The Satanic Temple
participating from, not from the very beginning,
but, you know, got involved as early as some of
the first events, the Black Mass in Boston, which
again since I'm bad with dates I won't be able to
give you that, I apologize, but very early on in
TST history, and also was a leader of the Detroit
chapter.

Detroit was one of the very first, I
think there were like three chapters that were
our first chapters, and Detroit was one of them,
and it was Jex sort of from the beginning, and
we're talking about prior to the formation of the
national council, because at first we didn't know
we'd need one, you know, small organization
problems, right? It was just like, sure. Form a
group. That's fine, and it wasn't until later
that as more and more, people realized, oh,

1 Stevens

2 there's a chapter here, we want our own chapter,
3 right, and more people are asking, so getting
4 more and more chapters, and so, as I mentioned
5 previously, I was asked to be on the national
6 council at the end of 2015, beginning of 2016
7 because that's when that group formed, but Jex
8 was the head of the Detroit chapter since before
9 that. Right? It was one of the original
10 chapters.

11 I will also say that in my time on
12 the national council, we, you know, for a long
13 time like we had no real interaction with Jex.
14 In fact, it came up in conversation multiple
15 times that like, you know, as we as an
16 organization were growing, we were instituting
17 new policies, new rules, and Jex seemed to either
18 like, you know, not respond to e-mails or just
19 not be interested in participating in our
20 following. When we instituted a policy about
21 event proposals so that all events would be
22 reviewed before chapters just did them, Jex
23 wasn't interested in following that.

24 Early on there was a lot of respect
25 and affection for Jex as an early member. So we

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let a lot of things slide. So many stories involved leaving a lot of things to the side, but then nothing had risen to the point of Jex being a real topic of conversation until I remember, I remember the evening getting the phone call saying, hey, Jex just like literally like made a statement about encouraging people to kill the president in one of the rituals.

We need to freaking do something about this. Jex was almost a ghost prior to that. You know what I mean? Like doing things, not completely, because there were some things she did that were very antagonistic. We had chapters in Texas, and chapters tend to be very territorial isn't necessarily the right word, but they have their area, and so Jex just independently, no proposal, no communication, decided to like do a thing in Texas and got the Texas groups upset, because they felt like they were being, like why are we even here, if Jex can just without even telling us ahead of time do this ritual thing, this call for this action in our area.

So that kind of thing was the only

1 Stevens

2 real way in which Jex's name came up and before
3 the big incident, and then that was a lot of long
4 discussions about like, you know, do we hope it
5 goes away? No, that seems like a bad idea. You
6 know what I mean?

7 Like these sorts of discussions that
8 ended up with deciding that Jex needed to be
9 removed, and then of course since Doug, Lucien
10 had the longest running personal connection with
11 her, Lucien was like said that he would, you
12 know, let her know basically. Yeah. That's my
13 quick summary.

14 Q. Okay. So what is this document,
15 Exhibit 23, Bates number 105, what is this all
16 about?

17 A. Let me take a quick glance through.

18 Q. You referenced the big incident. Is
19 this, does this e-mail have to do with the big
20 incident?

21 A. Hang on. Let me quickly. I know
22 I've seen it before, but give me a moment. So,
23 no. No and yes. So what this is referencing I
24 believe is the fact that at some --

25 Q. Take a look at page 6.

1 Stevens

2 A. Sure.

3 Q. The bottom of page 6.

4 A. Yeah.

5 Q. So on May 9th, Doug Mesner, Lucien,
6 right?

7 A. Yes.

8 Q. Writes a draft e-mail?

9 A. Hang on. Hang on. Are you talking
10 about page 6?

11 Q. Yes. Page 6?

12 A. I'm looking at a page 6. Where's
13 May 9th?

14 Q. No. I'm sorry. May 5th, 2019.

15 A. I got it. Yeah, yeah, yeah.

16 Q. And I'm wondering if that refreshes
17 your recollection about the nature of this
18 e-mail, the timing, what it was referring to?

19 A. It does. Thank you very much. So
20 this wasn't a direct consequence of the incident
21 of her having a ritual in which she told people
22 that they should kill the president, which is why
23 she was terminated. You know, it wasn't that
24 incident, but after the movie came out --

25 Q. And, by the movie, you mean the movie

1 Stevens

2 Hail Satan?

3 A. Yeah, the documentary Hail Satan,
4 which I thought was very fair. I thought it was
5 a really good representation personally.
6 Whatever. That's an aside. It doesn't matter,
7 but, anyway, there were people who asked
8 questions about it, and I believe that Jex also
9 made some statements online, possibly wrote an
10 article, I'm a little fuzzy on this, but making
11 some claims, some false claims about the
12 circumstances of her being removed, and so this
13 was now like, well, crap, we're getting all these
14 questions, Jex has put these false statements on
15 the record. So therefore we feel like we need to
16 have something to clarify things. That's what
17 this e-mail thread is about.

18 Q. Okay. You said that Jex wrote an
19 article. I'll represent to you in May, I'm
20 sorry, August 2018. She wrote an article in
21 Medium called The Struggle For Justice Is
22 Ongoing.

23 A. That sounds like it. Yeah.

24 Q. Yeah, and in that article Jex writes,
25 "While I was part of the organization, TST, I

1 Stevens

2 witnessed male members of the organization
3 exploit their position and influence to behave
4 inappropriately and disrespectfully towards
5 women. I myself experienced harassment and abuse
6 from members who have now left the organization.
7 I know that my experience is one of many examples
8 of systematic gaslighting, degradation and
9 bullying that many women have experienced within
10 TST over the years."

11 Do you recall that from Jex's
12 article?

13 A. I absolutely do, because I remember
14 discussing it with people on national council at
15 the time and being so flabbergasted by it, being
16 just flabbergasted by it, you know, aside from
17 the fact that it's entirely possible there are
18 some sexist people who behaved poorly towards
19 her, because that happens, like that might happen
20 sometimes, but in terms of any sort of systemic
21 thing, like, on national council we're like we
22 certainly weren't aware.

23 Jex barely interacted with from our
24 point of view on national council Jex didn't
25 interact. Jex was so in her own, doing her own

1 Stevens

2 it right now?

3 Q. Go ahead.

4 A. Steven Zara, last name, Z-a-r-a,
5 first name S-t-e-v-e-n.

6 Q. And do you know how long for how long
7 a period of time Steven was retained to write
8 press releases?

9 A. I can't say, but I can say, I might
10 as well as long as I've done this already. I've
11 already grabbed my phone out, so I might as well
12 just tell you the e-mail.

13 The e-mail says, "Steven Sara writes
14 the first drafts. They are then sent to me for
15 review and revision. The rewrites are usually
16 extensive. In short, three answers could be
17 given." He means different over time. "Steven
18 Sara, both of them, or me," this is from Malcolm,
19 "exclusively because I give the notes for Steven
20 who does the rewrites and then they get sent for
21 other rewrites and approval." So that's the
22 details.

23 Q. Got it. What is the purpose of these
24 press releases?

25 A. So that people are aware that we

1 Stevens

2 exist and the stuff we're doing. To my
3 understanding, that's the reason that anybody
4 does press releases.

5 Q. So do you use press releases as well
6 to increase your membership?

7 A. No. I'm not interested in
8 proselytizing or converting people. They're not
9 tools for membership. We have unfortunately come
10 to realize in our legal system, not that I'm
11 bashing our legal system, where we have
12 unfortunately come to realize that, no matter
13 what the law says, people's perception, people's
14 awareness, people's opinion makes a difference,
15 and so we like to let people know when we're
16 doing good things, when we're, you know, what the
17 issues are, and it has nothing to do with, we
18 don't want to convert people to Satanism. We
19 just want people to know that this is a thing
20 that exists.

21 Q. Do you do any advertising to get new
22 members?

23 A. Well, to get new members, no.
24 Absolutely not. For the same reasons I just
25 gave. No. Do we do any advertising? You have

1 Stevens

2 to be more specific. I know that sometimes we
3 have specific political or specific initiatives
4 which we promote. So that's different, but
5 advertising to get new members, no.

6 Q. Well, do you do any kind of, you said
7 you don't do any proselytizing. Do you do any
8 kind of recruiting or any other efforts to
9 increase your membership?

10 A. No.

11 Q. So you gain members solely by word of
12 mouth? Is that fair?

13 A. People learning about us, thinking
14 that's interesting, learning more and deciding
15 that this is something that they feel enough of a
16 connection to that they identify with us.
17 Membership is -- I mean we're a religious
18 organization. I mean I'm not telling you like
19 you don't know, but we're a religious
20 organization. We're not trying to, we're not a
21 political party. We're not a, you know, interest
22 group in that sense.

23 So if something that we're doing
24 resonates with people, then they may decide, oh,
25 hey, the Satanism thing is interesting. It

1 Stevens

2 there are a number of news stories that discuss
3 protests and issues around after-school Satan
4 clubs in different places over the years. I
5 believe Pennsylvania. I believe --

6 Q. Boston, I believe.

7 A. Boston, I believe. Pennsylvania
8 comes to mind because there was just a lot of
9 hullabaloo over that one, and some others. So
10 that might be in the documents somewhere, right?
11 These news stories.

12 Q. Yeah. In addition to the money spent
13 on having someone write press releases, is there
14 any other money spent on outward-facing
15 activities, so to speak, like marketing? Is
16 there a separate budget for marketing?

17 A. First of all, I'm not going to speak
18 towards, when you say is there a separate budget
19 for. I'm not going to speak to what our budget
20 is. To the best of my knowledge, this isn't,
21 like I don't know. I'm not the accountant. I'm
22 not here to talk about that, but, so I just want
23 to be careful about the way I present this.

24 Like there are some things that as a
25 matter of public record we've spent money on. We

1 Stevens
2 had some billboards, and they weren't for getting
3 members. They were for letting people know about
4 initiatives like the protect children project,
5 and so we got some billboards because we are
6 against corporal punishment, and we wanted to
7 make sure that the word was out that we think
8 that the right to not be hit is a religious right
9 for our members and for the children of our
10 members.

11 So we have billboards. That's money
12 spent. Is that marketing? I don't know. Do you
13 see what I'm saying?

14 Q. Yeah, I do, I do, and I was going to
15 ask you a follow-up, which is, generally
16 speaking, when the church is involved in
17 advocacy, whether through litigation or
18 otherwise, does it often occasionally sometimes
19 employ similar methods to draw attention to its
20 mission?

21 A. Similar to what?

22 Q. Putting up the billboards to
23 protest --

24 A. Corporal punishment.

25 Q. Corporal punishment. For example,