

UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

The Satanic Temple, Inc.

Plaintiff

v.

Newsweek Digital LLC

Defendant.

1:22-cv-1343 (MKV)

**DECLARATION OF
MALCOLM JARRY**

COMES NOW Malcolm Jarry, who states as follows under penalty of perjury of the laws of the United States of America.

1. **Purpose.** This declaration is made in support of The Satanic Temple's motion for summary judgment in the above cause.
2. **Identity and qualifications.** I am Malcolm Jarry, a co-founder and co-director of The Satanic Temple, Inc. I am an adult of sound mind with no felonies. I base the following statements on my own personal knowledge and under penalty of perjury.
3. **Background.** In my role for The Satanic Temple, my responsibilities include financial accounting and tracking donation trends.
4. **General reputational damages.** People have cancelled their recurring donations to the Temple because of the article. We received feedback from people that they believe the subject article statement to be true because *Newsweek* published it. We have also been unfavorably compared to the Catholic Church because of the article statement.
5. **Remediation expenses.** To combat the ill effects of the article, I hired a public relations firm and a public relations professional to assess and mitigate damage done to the Temple from the subject article statement. The sum of our remediation expenses was \$43,350. True

and correct copies of invoices I received and paid in connection with this effort are attached to the motion, in order of appearance:

28: Invoice no. 7204 (June 15, 2022)

29: Invoice no. 1001 (July 31, 2022)

30: Invoice no. 1017 (October 5, 2022)

31: Invoice no. 1019 (November 11, 2022)

32: Invoice no. 1023 (December 13, 2022)

33: Invoice no. 1027 (February 27, 2023)

34: Invoice no. 1032 (May 3, 2023)

35: Invoice no. 1034 (May 30, 2024)

36: Invoice no. 1039

FURTHER AFFIANT SAYETH NOT.

Pursuant to 28 USC § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. *s/Malcolm Jarry*
Executed on May 17, 2024.