

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. and Ann Doe,
Plaintiffs

v.

Cecile Young, in her official capacity,
Defendant.

APPENDIX



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

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DECLARATION OF DARCEY RUFFALO



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COMES NOW Darcey Ruffalo, who states as follows under penalty of perjury:

1. My name is Darcey Ruffalo. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.
2. I am submitting this declaration under my real name despite the risk of the catastrophic side-effects I may encounter from the controversy surrounding this case.
3. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs.
4. The purpose of this statement is to outline how the State of Texas infringed on my civil and constitutional rights to practice my sincerely held religious beliefs.
5. On Wednesday, April 13, 2022, I took two pregnancy tests both with positive results. I scheduled an appointment at Planned Parenthood 201 E Ben White Blvd Bldg. B Bldg. B, Austin, TX 78704, for the following morning.
6. On Thursday April 14th, 2022, I received a transvaginal ultrasound and was told a “heartbeat” could be detected. The person administering the ultrasound estimated me at approx. 6 1/2 to 7 weeks gestation. I started crying as the sonographer explained that I could not receive an abortion in Texas. She asked if I wanted to look at the image from the ultrasound, which I did.
7. I was never made to or given the option to hear the electrical pulses from the tube of cardiovascular cells. I wanted to hear the pulses because I wanted every bit of proof that I could not have an abortion in the State of Texas due to its laws which clearly infringed on my sincerely held religious beliefs.

8. The sonographer asked me if I would like to speak to somebody regarding resources available. I said yes and asked her if she was familiar with The Satanic Temple. She was not.

9. I was then directed to speak with a different person regarding options and resources available to me. I told this person that I was a Satanist. I asked if she'd ever heard of The Satanic Temple, and their ongoing campaign for women's rights. I mentioned TST's exemption letter but quickly dropped the subject in order to speak with my clergyperson first.

10. As a member of the Satanic Temple and a religious Satanist, it is my sincerely held religious belief, clearly stated within Tenet II of the seven fundamental tenets, that one's body is inviolable, subject only to one's own will.

11. I left the clinic and reached out to TST for help. I was put in contact with a Minister of Satan who works with the Religious Reproductive Rights campaign. She offered herself as a point of contact for guidance and support.

12. The following Wednesday, April 20th 2022, I returned to the clinic where I received an ultrasound. I introduced myself, and they remembered me. I stated that the State of Texas' "six week" abortion law violated my constitutional right to freely practice my sincerely held religious beliefs. These beliefs are supposed to be protected by the First Amendment. I then presented the clinic staff with a signed religious exemption letter that TST provided to me.

13. The clinic staff told me that they sympathized with me, but said it was in their best interest to deny any abortion after detecting a "heart beat."

14. I was ultimately forced to obtain an abortion through my own means, research, and finances alone.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER AFFIANT SAYETH NOT.

/s/ Darcey Ruffalo, in Travis County, Texas on August 21, 2022.

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MARY DOE’S STATEMENT



Matt Kezhaya

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COMES NOW Mary Doe, who states as follows under penalty of perjury.

1. My name is Mary Doe. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.
2. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
3. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs. The tenets of TST are attached to this declaration as Exhibit A-1.
4. I have been a member of TST for more than six years. During that time, I have been highly involved in TST’s organizational activities as both a member and in a leadership role.
5. I became pregnant after the six-week ban (SB 8) became law.
6. By the time I learned I was pregnant, I had approximately one and a half weeks before the law would have prevented me from receiving an abortion.
7. I scheduled my first appointment to occur approximately 48 hours after learning I was pregnant. This was the first of four separate appointments I was required to attend.
8. At my first appointment, the ultrasound was not able to detect a fetus. I was told I had to return in a week. I was told this despite the fact that a pregnancy test confirmed my pregnancy at the appointment.
9. I was then required to attend a second appointment where I was forced to participate in objectionable counseling that I did not want and that conflicted with my sincerely held religious beliefs. In my opinion the literature I received was religious in nature. One

document featured the image of a woman who was clearly in prayer.

10. After my third visit, I was finally cleared to receive the medication to perform a medical abortion. Before taking the medication, I performed the Satanic Abortion Ritual as described in Plaintiff's Amended Complaint.

11. My decision to engage in the Ritual is meaningfully different from a secular abortion. As a member of TST, I venerate the biblical concept *ha satan* (literally: "the adversary" or "the accuser"). *Ha satan* is a description of being, not a particular individual. I am a non-theistic Satanist who venerates the concept of the Biblical Satan. I participate in various rituals, but do not literally worship the divine entity that Christians identify as "The Devil" and do not have any expectation that participating in a ritual, by itself, will affect the outside world.

12. I believe in the power of ritual and believes that authority should be rebelled against (or "accused") if it is tyrannical. Specifically, I subscribe to TST's doctrinal position that the regulations imposed by Texas amount to "tyranny."

13. I believe in an inversion of the traditional Christian norms. I believe that the self should be assigned a greater importance than the outside world. This is an inversion of the Christian norm that the outside world (e.g., God and Church) may freely dictate the thoughts and actions of the adherents. Likewise, I do not subscribe to humility as a virtue and self-deprecation as a lifestyle. I do not denigrate desires and practices that I enjoy and which do not harm others. I hold the Third Tenet as one of my beliefs as a member of TST.

14. The Ritual allows me to express my sincerely held beliefs as a member of TST. My participation in this ritual is intended to help cast off any guilt, shame, or mental discomfort I may experience in

connection with my election to abort the pregnancy.

15. The Ritual further confirms my choice and wards off any effects of unjust persecution. Here, my perception of the unjust persecution is that it is an effort by the State (the “outside world”) to infringe on my decision-making about my own health decision (the “inside world.”) I perceive the State’s intrusion into my decision about my own body as a tyrant overpowering my resistance to compel beliefs and actions. In other words, I see the State’s actions as a gross abuse of power. I understand that these abortion regulations place the State in the role of tyrant-king which claims divine authority over me in an effort to make me as a Satanist feel guilt, doubt, and shame on an issue of religious significance. This is deeply offensive to me as someone who subscribes to the Third Tenet.

16. I discovered I was pregnant on January 13, 2021. I considered my options and resolved to abort the pregnancy through the Ritual. On January 14, I contacted the Planned Parenthood facility in Houston, TX to arrange for a medical appointment to complete the Ritual.

17. Throughout my visits with the facility, I first learned of, and was then forced to participate in certain abortion regulations that both impede my ability to participate in the Ritual freely, and directly violated my sincerely held religious beliefs. Specifically, I take issue with the following regulations:

- (a) The requirement to have a sonogram as a precondition of obtaining an abortion,
- (b) The forced decision to reject the “opportunity” of seeing the sonogram results,
- (c) The forced listening to a narrative of the sonogram results, and

(d) The mandatory waiting period between the sonogram and receiving the abortion.

18. My understanding is that none of these regulations are medically necessary. The first three regulations require me to disrupt the Ritual and directly violate the Fifth Tenet of my belief as a member of TST. The fourth regulation requires a medically unnecessary delay during the Ritual.

19. I understand that the sonogram makes the abortion cost \$150 more than it would otherwise cost. I have limited financial resources. I do not want to expend my limited funds on a medically unnecessary procedure to which I object. By regulating the abortive act and refusing to grant an exemption for the Ritual, the State has placed a barrier between me and my ceremony.

20. I considered requesting a religious exemption to these regulations after first contacting the clinic. Ultimately I decided to forego requesting a religious exemption because I was afraid the process of seeking an exemption would extend my pregnancy beyond the point where I would still legally be allowed to have an abortion under Texas' restrictive and tyrannical laws. I also declined to seek a religious exemption from these regulations because I understand that – as written – the regulations at issue do not provide for religious exemptions. I also understand that even if the facility were to grant an exemption, it could face sanctions from the State of Texas.

21. The entire ordeal of my abortion was terrifying. The tyrannical impositions by the State of Texas on my ability to exercise my sincerely held religious beliefs by being able to freely perform the Ritual at a time and place of my choosing made the experience even more stressful and terrifying that it otherwise needed to be. Practicing the ritual before receiving a medical abortion gave me a great feeling of comfort and allowed me to be at peace.

22. I am a woman still in my childbearing years. I understand that

upcoming laws in Texas will impose further impositions by fully banning abortions altogether. Because I still have the physical ability to conceive, I may find myself completely barred from exercising my sincerely held religious beliefs at some future date.

23. This will force me to travel to another state if I need another abortion, effectively preventing me from exercising my sincerely held religious beliefs anywhere within the State of Texas.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER AFFIANT SAYETH NOT.

/s/ Mary Doe, in Travis County, Texas, on August 20, 2022.

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Defendant.

DECLARATION OF MATT KEZHAYA



Matt Kezhaya

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COMES NOW Matt Kezhaya, who states as follows under penalty of perjury.

1. I am Matt Kezhaya. I represent the plaintiffs.
2. I submit this Declaration in support of Plaintiffs' Motion for Temporary Injunction.
3. Members of The Satanic Temple ("**TST**") hold its tenets as sincere religious beliefs. The tenets of are attached to this declaration as **Exhibit 1**.
4. The Satanic Temple is, in all aspects, a religion. We proved it. *Satanic Temple v. City of Scottsdale*, No. CV18-00621-PHX-DGC, 2020 WL 587882 (D. Ariz. Feb. 6, 2020).
5. On July 27, 2022, Attorney General of Texas, Ken Paxton, issued a legal opinion authorizing prosecutors to immediately pursue criminal prosecutions based on violations of pre-*Roe* abortion prohibitions. **Exhibit 2**. Advisory on Texas Law Upon Reversal of *Roe v. Wade*, Tex. Op. Att'y Gen. (unreported). More prohibitions take effect on August 25, 2022. Tex. Health & Safety Code § 170A.
6. The publicly recorded debate for SB 8 (the six-week ban) makes clear that the other religion's beliefs were foremost in the minds of those voting in favor of SB 8. See Texas State Senator Lucio, quoting Pope Francis. See. Tx. S.J. CSSB 8, 87th RS 2001 Tx. Gen. Laws ch. 171 at p. 490. He also quoted Proverbs 14:30.
7. The decision whether to abort a pregnancy is a private matter of conscience between a woman and her conscience. This was affirmed by Texas State Senator Sarah Eckhardt during debate of the six-week law. See. Tx. S.J. CSSB 8, 87th RS 2001 Tx. Gen. Laws ch. 171 at p. 492.
8. A true and correct copy of the legislative history is at **Exhibit 3**.

9. The concepts of “religion” and “conscience” are interchangeable. Both refer to moral viewpoints and moral decisions which do not transgress upon a discrete right of another person. See Lucian Dhooge, *The Equivalence of Religion and Conscience*, 31 Notre Dame J.L. Ethics & Pub. Pol’y 253, 246-280 (2017); e.g., *Sherbert v. Verner*, 374 U.S. 398 (1963); *Wisconsin v. Yoder*, 406 U.S. 205 (1972); *Thomas v. Rev. Bd. of Indiana Emp. Sec. Div.*, 450 U.S. 707 (1981).

As an officer of this Court, and under penalty of perjury, I swear that the foregoing is true.

FURTHER AFFIANT SAYETH NOT.

Matt Kezhaya

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SATANIC ABORTION RITUAL



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SATANIC ABORTION RITUAL

The Satanic Abortion Ritual is a destruction ritual that serves as a protective rite. Its purpose is to cast off notions of guilt, shame, and mental discomfort that a patient may be experiencing due to choosing to have a medically safe and legal abortion.

Even the most confident and unapologetic individual can experience uncomfortable feelings and anxiety for choosing to terminate their pregnancy. Laws in many states that impose waiting periods and state-mandated counseling can exacerbate these feelings, as can social condemnation and outright harassment by those who oppose abortion.

Misinformation about abortion and guilt for pursuing that option can be a lot to handle. It can be exhausting and frustrating to try to shrug off and dismiss internal and external pressures, especially those driven by religious convictions that disregard the beliefs and freedoms of others. Even when one recognizes that these criticisms are invalid, they can make an already troubling time even harder.

This ritual is intended to alleviate some of these stressors and empower the patient to be guided by the Third and Fifth Tenets when pursuing their decision.

The purpose of the ritual is not to persuade someone to have an abortion if they are undecided. Instead, the ritual serves to assist in confirming their decision and to ward off the effects of unjust persecution, which can cause one to stray from the paths of scientific reasoning and free will that TST members strive to embody.



ABOUT THE RITUAL PREPARATIONS

TST's abortion ritual can be performed to address definable concerns or to overcome unproductive feelings.

The ritual, which includes the abortion itself, spans the entirety of the pregnancy termination procedure. There are steps to be performed before, during, and after the medical or surgical abortion.

Because rituals are deeply personal to those enacting them, there are variations in how it may be performed. The ritual can be personalized based on personal preferences and availability of materials. There is no need to purchase anything special or to adhere to every word. What is essential is the spirit and general intent.

One can also perform their favorite destruction ritual to target any of the unwanted feelings incited by adversity faced as a consequence of choosing to have an abortion. Feel free to take or leave whatever you wish from this one to build your own.

Before performing the ritual, you may choose to review the science about the safety and reality of abortion and the debunked claims from those who oppose abortion. You may also choose to read stories or listen to podcasts about people who made great sacrifices in the struggle to establish the reproductive rights we have today. These stories can be inspirational and may subdue stigmas you might feel from those who oppose abortion.

Your ability to choose to terminate a pregnancy is consistent with the ideals of liberty and freedom. Be proud of pursuing what you want for your life despite opposition.

IMPLEMENTS

- A quiet space where you feel comfortable
- Something that allows you to see your reflection
- A copy of The Satanic Temple's third and fifth tenets and personal affirmation

TENETS AND AFFIRMATIONS

Tenet III

One's body is inviolable, subject to one's own will alone.

Tenet V

Beliefs should conform to one's best scientific understanding of the world. One should take care never to distort scientific facts to fit one's beliefs.

Personal Affirmation

*By my body, my blood
By my will, it is done.*



PROCEDURES

For medical abortions:

Immediately before taking the medication(s) to terminate your pregnancy, look at your reflection to be reminded of your personhood and responsibility to yourself. Focus on your intent, take deep breaths, and make yourself comfortable. When ready, read the Third Tenet aloud to begin the ritual. After swallowing the medication(s), take another deep breath and recite the Fifth Tenet. After you have passed the embryo, return to your reflection, and recite the personal affirmation. Feel the doubts dissipating and your confidence growing as you have just undertaken a decision that affirms your autonomy and free will. The religious abortion ritual is now complete.

For surgical abortions:

Immediately before receiving any anesthetic or sedation, look at your reflection to be reminded of your personhood and responsibility to yourself. Focus on your intent, take deep breaths, and make yourself comfortable. When you are ready, say the Third Tenet aloud. The surgery can now begin. During the operation, take another deep breath and recite the Fifth Tenet. Immediately after the surgery, return to your reflection and recite the personal affirmation. Feel the doubts dissipating and your confidence growing as you have just undertaken a decision that affirms your autonomy and free will. The religious abortion ritual is now complete.



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THE SEVEN TENETS



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The Seven Tenets

1. One should strive to act with compassion and empathy toward all creatures in accordance with reason.
2. The struggle for justice is an ongoing and necessary pursuit that should prevail over laws and institutions.
3. One's body is inviolable, subject to one's own will alone.
4. The freedoms of others should be respected, including the freedom to offend. To willfully and unjustly encroach upon the freedoms of another is to forgo one's own.
5. Beliefs should conform to one's best scientific understanding of the world. One should take care never to distort scientific facts to fit one's beliefs.
6. People are fallible. If one makes a mistake, one should do one's best to rectify it and resolve any harm that might have been caused.
7. Every tenet is a guiding principle designed to inspire nobility in action and thought. The spirit of compassion, wisdom, and justice should always prevail over the written or spoken word.

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EXHIBIT 3



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KEN PAXTON
ATTORNEY GENERAL OF TEXAS

UPDATED ADVISORY ON TEXAS LAW UPON REVERSAL OF *ROE V. WADE*

Yesterday—July 26, 2022—the United States Supreme Court issued its final judgment in *Dobbs v. Jackson Women’s Health Organization*. As previously stated in our [June 24th Advisory](#), Texas’s Human Life Protection Act (“the Act”) takes effect on the 30th day after issuance of a judgment in a case overturning *Roe v. Wade*. See H.B. 1280, 87th Reg. Session 2021. Accordingly, we now know with certainty that the Act takes effect on August 25, 2022.

The Act provides that a “person may not knowingly perform, induce, or attempt an abortion” unless the mother has “a life-threatening physical condition aggravated by, caused by, or arising from a pregnancy that places [her] at risk of death or poses a serious risk of substantial impairment of a major bodily function unless the abortion is performed or induced.” Tex. Health & Safety Code § 170A.002(a)–(b).

“Abortion” is defined in section 245.002(1) of the Health and Safety Code as “the act of using or prescribing an instrument, a drug, a medicine, or any other substance, device, or means with the intent to cause the death of an unborn child of a woman known to be pregnant. The term does not include birth control devices or oral contraceptives.” The term “abortion” in Texas law does not apply when these acts are done to “(A) save the life or preserve the health of an unborn child; (B) remove a dead, unborn child whose death was caused by spontaneous abortion; or (C) remove an ectopic pregnancy.” Tex. Health & Safety Code § 245.002(1)(A)–(C).

A person who violates the Act commits a first-degree felony if an unborn child dies as a result, a second-degree felony if the child lives, incurs civil penalties of no less than \$100,000 for each violation, and may lose his or her professional license. *Id.* § 170A.004–.007. The pregnant woman upon whom the abortion is performed cannot be penalized, *id.* § 170A.003, and the law protects women facing life-threatening physical conditions resulting from pregnancy complications, *id.* § 170A.002(b)(2).

My office is specifically authorized to pursue and recover civil penalties for violations of the Act, *id.* § 170A.005, and I will do my duty to enforce this law. Further, we stand ready to assist any local prosecutor who pursues criminal charges. Tex. Gov't Code § 402.028. Additionally, state licensing authorities “shall revoke the license, permit, registration, certificate, or other authority of a physician or other health care professional who performs, induces, or attempts an abortion in violation of” the Act. Tex. Health & Safety Code § 170A.007.

At the same time, local prosecutors may choose to immediately pursue criminal prosecutions based on violations of Texas abortion prohibitions predating *Roe* that were never repealed by the Texas Legislature.¹ Although these statutes were unenforceable while *Roe* was on the books, they are still Texas law. Now that *Roe* has been overturned, those statutes are in full effect.²

Texas law in a post-*Roe* world has already been written. Now that the Supreme Court has finally overturned *Roe*, I will do everything in my power to protect mothers, families, and unborn children, and to uphold the state laws duly enacted by the Texas Legislature.



KEN PAXTON
Attorney General of Texas

¹ See Tex. Rev. Civ. Stat. art. 4512.1 (“Abortion”), previously codified at Tex. Pen. Code art. 1191 (1925) (“If any person shall designedly administer to a pregnant woman or knowingly procure to be administered with her consent any drug or medicine, or shall use towards her any violence or means whatever externally or internally applied, and thereby procure an abortion, he shall be confined in the penitentiary not less than two nor more than five years; if it be done without her consent, the punishment shall be doubled. By ‘abortion’ is meant that the life of the fetus or embryo shall be destroyed in the woman’s womb or that a premature birth thereof be caused.”); Tex. Rev. Civ. Stat. art. 4512.2 (“Furnishing the means”), previously codified at Tex. Pen. Code art. 1192 (1925) (“Whoever furnishes the means for procuring an abortion knowing the purpose intended is guilty as an accomplice.”); Tex. Rev. Civ. Stat. art. 4512.3 (“Attempt at abortion”), previously codified at Tex. Pen. Code art. 1193 (1925) (“If the means used shall fail to produce an abortion, the offender is nevertheless guilty of an attempt to produce abortion, provided it be shown that such means were calculated to produce that result, and shall be fined not less than one hundred nor more than one thousand dollars.”); Tex. Rev. Civ. Stat. art. 4512.4 (“Murder in producing abortion”), previously codified at Tex. Pen. Code art. 1194 (1925) (“If the death of the mother is occasioned by an abortion so produced or by an attempt to effect the same it is murder.”); Tex. Rev. Civ. Stat. art. 4512.6 (“By medical advice”), previously codified at Tex. Pen. Code art. 1196 (1925) (“Nothing in this chapter applies to an abortion procured or attempted by medical advice for the purpose of saving the life of the mother.”).

² With one exception: Only the Dallas County District Attorney is currently enjoined from enforcing these statutes.

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EXHIBIT 4



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SENATE JOURNAL

EIGHTY-SEVENTH LEGISLATURE — REGULAR SESSION

AUSTIN, TEXAS

PROCEEDINGS

SEVENTEENTH DAY

(Tuesday, March 30, 2021)

The Senate met at 1:00 p.m. pursuant to adjournment and was called to order by the President.

The roll was called and the following Senators were present: Alvarado, Bettencourt, Birdwell, Blanco, Buckingham, Campbell, Creighton, Eckhardt, Gutierrez, Hall, Hancock, Hinojosa, Huffman, Hughes, Johnson, Kolkhorst, Lucio, Menéndez, Miles, Nelson, Nichols, Paxton, Perry, Powell, Schwertner, Seliger, Springer, Taylor, West, Whitmire, Zaffirini.

The President announced that a quorum of the Senate was present.

Senator Miles offered the invocation as follows:

Heavenly Father, we come to You on this day of uncertainty. On the day many would consider dark but, Father, You are our light. There is a war going on for the soul of Texas, and we are here to defend it. So, heavenly Father, I ask that You provide us with the strength and guidance. I ask that You touch the hearts of many and minds of many and each Senator in this body with understanding that You give us knowledge and foresight to improve the lives and to provide a better tomorrow for all God's children in the true equitable manner. Father God, the threads of our democracy are withering. So, holy and righteous God, I ask that You move within us to propel us forward to do the work despite outside influences. Lord, thank You for the prayers from this body for me last week. I am grateful to serve with such a wonderful group of human beings. Lord, I ask for health and safety and love for each person under the sound of my voice. Cover them with Your protection. Keep the faith, keep the fight as we do the work of all Texans. For in Matthew it reads, for when two to three are gathered, I am there. And so, He is here with us today. I ask that you all join me in saying, Amen.

Senator Whitmire moved that the reading of the Journal of the proceedings of the previous day be dispensed with and the Journal be approved as printed.

The motion prevailed without objection.

RESOLUTION SIGNED

The President announced the signing of the following enrolled resolution in the presence of the Senate: **HCR 30**.

MESSAGE FROM THE GOVERNOR

The following Message from the Governor was read and was referred to the Committee on Nominations:

March 30, 2021
Austin, Texas

TO THE SENATE OF THE EIGHTY-SEVENTH LEGISLATURE, REGULAR SESSION:

I ask the advice, consent and confirmation of the Senate with respect to the following appointments:

To be members of the Texas Real Estate Commission for terms to expire January 31, 2027:

Leslie Lerner
Houston, Texas
(replacing Rayito O. Stephens of Pearland whose term expired)

Benjamin "Ben" Peña
Bayview, Texas
(replacing Thomas J. "T.J." Turner of Austin whose term expired)

Mark A. Woodroof
Houston, Texas
(replacing Robert H. "Bob" Leonard of San Antonio whose term expired)

Respectfully submitted,

/s/Greg Abbott
Governor

**SENATE RULE 7.12(a) SUSPENDED
(Printing of Bills)**

On motion of Senator Nelson and by unanimous consent, Senate Rule 7.12(a) was suspended and the committee report for **CSSB 1** was ordered not printed.

**INTRODUCTION OF
BILLS AND RESOLUTIONS POSTPONED**

The President announced that the introduction of bills and resolutions on first reading would be postponed until the end of today's session.

There was no objection.

SENATE RESOLUTION 205

Senator Buckingham offered the following resolution:

SR 205, Honoring Texans in the medical community who lost their lives in service as frontline workers during the COVID-19 pandemic.

The resolution was read.

On motion of Senator Kolkhorst and by unanimous consent, the names of the Lieutenant Governor and Senators were added to the resolution as signers thereof.

On motion of Senator Buckingham, **SR 205** was adopted by a rising vote of the Senate.

GUEST PRESENTED

Senator Buckingham, joined by Senator Campbell, was recognized and introduced to the Senate Diana Fite, President of the Texas Medical Association.

The Senate welcomed its guest.

SENATE RESOLUTION 206

Senator Menéndez offered the following resolution:

SR 206, Recognizing March 30 through April 1, 2021, as VIVA San Antonio Days.

MENÉNDEZ
CAMPBELL
GUTIERREZ
ZAFFIRINI

The resolution was read and was adopted without objection.

SENATE RESOLUTION 198

Senator Alvarado offered the following resolution:

SR 198, Recognizing March 30, 2021, as Texas Music Advocacy Day.

The resolution was read and was adopted without objection.

CONCLUSION OF MORNING CALL

The President at 1:43 p.m. announced the conclusion of morning call.

(Senator Nelson in Chair)

**COMMITTEE SUBSTITUTE
SENATE BILL 196 ON SECOND READING**

On motion of Senator Zaffirini and by unanimous consent, the regular order of business was suspended to take up for consideration **CSSB 196** at this time on its second reading:

CSSB 196, Relating to prohibited relationships between holders of certain alcoholic beverage licenses and permits.

The bill was read second time and was passed to engrossment by a viva voce vote.

All Members are deemed to have voted "Yea" on the passage to engrossment.

**COMMITTEE SUBSTITUTE
SENATE BILL 196 ON THIRD READING**

Senator Zaffirini moved that Senate Rule 7.18 and the Constitutional Rule requiring bills to be read on three several days be suspended and that **CSSB 196** be placed on its third reading and final passage.

The motion prevailed by the following vote: Yeas 31, Nays 0.

The bill was read third time and was passed by the following vote: Yeas 31, Nays 0.

(President in Chair)

SENATE BILL 873 ON SECOND READING

On motion of Senator Hancock and by unanimous consent, the regular order of business was suspended to take up for consideration **SB 873** at this time on its second reading:

SB 873, Relating to disclosure by the comptroller to the purchaser of a business of the amount of tax due.

The bill was read second time and was passed to engrossment by a viva voce vote.

All Members are deemed to have voted "Yea" on the passage to engrossment.

SENATE BILL 873 ON THIRD READING

Senator Hancock moved that Senate Rule 7.18 and the Constitutional Rule requiring bills to be read on three several days be suspended and that **SB 873** be placed on its third reading and final passage.

The motion prevailed by the following vote: Yeas 31, Nays 0.

The bill was read third time and was passed by the following vote: Yeas 31, Nays 0.

SENATE BILL 343 ON SECOND READING

On motion of Senator Kolkhorst and by unanimous consent, the regular order of business was suspended to take up for consideration **SB 343** at this time on its second reading:

SB 343, Relating to the entry into the Texas Crime Information Center of certain information regarding conditions of bond imposed in criminal cases involving family violence.

The bill was read second time and was passed to engrossment by a viva voce vote.

All Members are deemed to have voted "Yea" on the passage to engrossment.

SENATE BILL 343 ON THIRD READING

Senator Kolkhorst moved that Senate Rule 7.18 and the Constitutional Rule requiring bills to be read on three several days be suspended and that **SB 343** be placed on its third reading and final passage.

The motion prevailed by the following vote: Yeas 31, Nays 0.

The bill was read third time and was passed by the following vote: Yeas 31, Nays 0.

**COMMITTEE SUBSTITUTE
SENATE BILL 601 ON SECOND READING**

On motion of Senator Perry and by unanimous consent, the regular order of business was suspended to take up for consideration **CSSB 601** at this time on its second reading:

CSSB 601, Relating to the creation and activities of the Texas Produced Water Consortium.

The bill was read second time and was passed to engrossment by a viva voce vote.

All Members are deemed to have voted "Yea" on the passage to engrossment except as follows:

Nays: Hall.

**COMMITTEE SUBSTITUTE
SENATE BILL 601 ON THIRD READING**

Senator Perry moved that Senate Rule 7.18 and the Constitutional Rule requiring bills to be read on three several days be suspended and that **CSSB 601** be placed on its third reading and final passage.

The motion prevailed by the following vote: Yeas 31, Nays 0.

The bill was read third time and was passed by the following vote: Yeas 30, Nays 1.

Nays: Hall.

**COMMITTEE SUBSTITUTE
SENATE BILL 941 ON SECOND READING**

On motion of Senator Buckingham and by unanimous consent, the regular order of business was suspended to take up for consideration **CSSB 941** at this time on its second reading:

CSSB 941, Relating to the adoption of a state scenic byways program.

The bill was read second time.

Senator Seliger offered the following amendment to the bill:

Floor Amendment No. 1

Amend **CSSB 941** (senate committee printing) in SECTION 1 of the bill by striking added Section 391.256(d), Transportation Code (page 1, lines 42-44), and substituting the following:

(d) The department may use money from the state highway fund for a project that receives a grant made under 23 U.S.C. Section 162 only for the purpose of satisfying matching funds requirements for the grant.

The amendment to **CSSB 941** was read and was adopted by a viva voce vote.

All Members are deemed to have voted "Yea" on the adoption of Floor Amendment No. 1.

CSSB 941 as amended was passed to engrossment by a viva voce vote.

All Members are deemed to have voted "Yea" on the passage to engrossment except as follows:

Nays: Hall.

**COMMITTEE SUBSTITUTE
SENATE BILL 941 ON THIRD READING**

Senator Buckingham moved that Senate Rule 7.18 and the Constitutional Rule requiring bills to be read on three several days be suspended and that **CSSB 941** be placed on its third reading and final passage.

The motion prevailed by the following vote: Yeas 31, Nays 0.

The bill was read third time and was passed by the following vote: Yeas 30, Nays 1.

Nays: Hall.

SENATE BILL 872 ON SECOND READING

On motion of Senator Hancock and by unanimous consent, the regular order of business was suspended to take up for consideration **SB 872** at this time on its second reading:

SB 872, Relating to the expiration of the dry cleaner environmental response program.

The bill was read second time and was passed to engrossment by a viva voce vote.

All Members are deemed to have voted "Yea" on the passage to engrossment except as follows:

Nays: Hall, Springer.

SENATE BILL 872 ON THIRD READING

Senator Hancock moved that Senate Rule 7.18 and the Constitutional Rule requiring bills to be read on three several days be suspended and that **SB 872** be placed on its third reading and final passage.

The motion prevailed by the following vote: Yeas 31, Nays 0.

The bill was read third time and was passed by the following vote: Yeas 29, Nays 2.

Yeas: Alvarado, Bettencourt, Birdwell, Blanco, Buckingham, Campbell, Creighton, Eckhardt, Gutierrez, Hancock, Hinojosa, Huffman, Hughes, Johnson, Kolkhorst, Lucio, Menéndez, Miles, Nelson, Nichols, Paxton, Perry, Powell, Schwertner, Seliger, Taylor, West, Whitmire, Zaffirini.

Nays: Hall, Springer.

SENATE BILL 863 ON SECOND READING

On motion of Senator Blanco and by unanimous consent, the regular order of business was suspended to take up for consideration **SB 863** at this time on its second reading:

SB 863, Relating to the temporary relocation of a residential child-care facility during a declared state of disaster.

The bill was read second time and was passed to engrossment by a viva voce vote.

All Members are deemed to have voted "Yea" on the passage to engrossment.

SENATE BILL 863 ON THIRD READING

Senator Blanco moved that Senate Rule 7.18 and the Constitutional Rule requiring bills to be read on three several days be suspended and that **SB 863** be placed on its third reading and final passage.

The motion prevailed by the following vote: Yeas 31, Nays 0.

The bill was read third time and was passed by the following vote: Yeas 31, Nays 0.

COMMITTEE SUBSTITUTE SENATE BILL 8 ON THIRD READING

Senator Hughes moved to suspend the regular order of business to take up for consideration **CSSB 8** at this time on its third reading and final passage:

CSSB 8, Relating to abortion, including abortions after detection of an unborn child's heartbeat; authorizing a private civil right of action.

The motion prevailed by the following vote: Yeas 19, Nays 12.

Yeas: Bettencourt, Birdwell, Buckingham, Campbell, Creighton, Hall, Hancock, Huffman, Hughes, Kolkhorst, Lucio, Nelson, Nichols, Paxton, Perry, Schwertner, Seliger, Springer, Taylor.

Nays: Alvarado, Blanco, Eckhardt, Gutierrez, Hinojosa, Johnson, Menéndez, Miles, Powell, West, Whitmire, Zaffirini.

The bill was read third time and was passed by the following vote: Yeas 19, Nays 12. (Same as previous roll call)

REMARKS ORDERED PRINTED

On motion of Senator Hughes and by unanimous consent, the remarks by Senators Lucio, Whitmire, Eckhardt, and Hughes regarding **CSSB 8** were ordered reduced to writing and printed in the *Senate Journal* as follows:

Senator Lucio: Thank you, Mr. President. And I must say as we had some fun just moments ago, I looked at the faces of all my colleagues on the floor and I said to myself, how beautiful. How beautiful life is. And how beautiful it is to be able to share our life together here on this floor, have some fun and at the same time do, do our best to make a difference to the people of this whole state, not just our districts. Senator Hughes, thank you for this bill. This bill speaks volumes. When I hear a

person's beating heart, I just don't hear their heart. I hear their soul speaking and I listen carefully. In committee, as I referenced yesterday, we heard the sound of two heartbeats. One a developed baby in a mother's womb. The other a newly, newly beating baby. And those two recordings, obviously, I couldn't tell the difference, right, and you couldn't either. And nobody else said anything but I could look at their faces, and I could see them gesturing that they were one in the same. But with both of them, you and I and others heard a human life. I know we did. Abortion is a terrible thing. I, as all of you well know by now, I am pro-life but more, more than that I am pro lifetime from conception to natural death. I want to be consistent so I am also strongly opposed to the death penalty because we know that it stops a beating heart as well. Again, consistent. There's nothing in this world more precious to any one of us than life. Our families, our friends, our neighbors, the people we know, it is something so precious, and when we lose life, we mourn. And some of us never forget those that go from our world. Quoting Cardinal Bergoglio, now known as Pope Francis, he said, quote, caring for life from the beginning to the end, what a simple thing, what a beautiful thing, he said. So, go forth and don't be discouraged, care for life. It's worth it, unquote. Pro-life policies are so much more than just a bill to vote on. Life is precious and it is to be respected and protected from conception to natural death. Thou has granted you life. He called you through his grace. A heartbeat is life, indeed it is. Thank you, Mr. President. Thank you, Members.

President: Thank you, Senator Lucio. Senator Whitmire. What purpose? Speak on the bill.

Senator Whitmire: I'd speak in opposition.

President: You're recognized.

Senator Whitmire: Thank you, Mr. President and Members. Members, if I could have your attention, I was very hesitant to speak because I don't think any votes are going to change, but Senator Lucio actually motivated me because, Eddie, I remember a couple sessions back you made a tough vote with the supporters of this bill. And I was driving back to Houston and I believe it was on the, Senator Patrick's talk show at that time. And you mentioned that you were proud of your vote, which I respect, but you also want to remind your colleagues that you were voting with that you can't just be pro birth but you have to be pro-life, means after birth. That was really a profound statement that I heard years ago and I haven't forgotten it. I wish you'd continue to remind folks that whether you're talking about Medicaid expansion or health care, that the birth is the first subject we're talking about and it really doesn't end there. I rise in opposition. I want to speak for a moment to represent the voices that can't be here today. I know for a fact that there are large number of Texans that disagree with the majority that are supporting this bill. And they do so, Senator Hughes, out of personal experiences. Some family matters, some, you mentioned yesterday you'd spoken to experts that said the heartbeat would really be the best time to judge the viability. Let me just cite an expert that came to me in my neighborhood a couple of years ago. She's a doctor at Texas Children's Hospital. She said, I know you're going to be dealing with this topic in the future and I want you to know, as a professional, we're doing remarkable things at Texas Children in terms of caring for fetuses, newborn. And she said one of our experiences are because of the Supreme Court's ruling that 20

weeks is viability. That we're beginning to see, alarmingly, that some fetuses, some children are being born, their brain has not developed, their spines have not developed, and they are so underdeveloped when they're capable of leaving the hospital that the families do not want to take them home. And, you know, I'm listening to this expert. She said, and we really don't know what to do with that situation because they are becoming wards of the state indefinitely. So, I rise to let us know things are not as plain sometime as the bill's laid out to be. So, there's a health care concern, probably an unintended consequence to your proposal that hasn't been brought up. I've been very fortunate in my life to meet many people in many different situations. I was a young caseworker, what was then called the welfare department, working my way through college in the food stamp program. In 1970, one of my coworkers, during a break started crying and said that she had just learned that she was pregnant, her boyfriend had left her, didn't know what to do. Back then abortions were illegal in the State of Texas, 1970. I came here in '73. So, out of desperation she said, I've got to get to New York. And there's a system that will allow you to go to Bush Intercontinental joined other young ladies, some housewives, but I need \$300.

[REDACTED]

but she was, had nowhere, had no one else to turn to. So, I've never forgotten her experience. She came back the next day, later married, has her own family today. So, I can cite other examples. And I just rise to represent those instances and hope that my expressions will be one that let's respect, as convinced as you are, Senator Paxton and others, that you're correct, that there's a different point of view and let you know, also, when we're having this debate on this, probably the most emotional issue that I've seen in my career, that our words matter, fears matter. And I know the debate yesterday brought some tears to those listening to you, that we just have to respect that

[REDACTED]

sides to respect the views of the other one because this is just, we're not talking about

[REDACTED]

President: Thank you, Senator. Senator Eckhardt, for what purpose?

Senator Eckhardt: To speak in opposition to the bill, Mr. President.

President: You're recognized.

Senator Eckhardt: I very much respect Senator Whitmire's consideration. I know that the votes on this bill won't change, but I'm hoping that by speaking this, my truth, that perhaps we will be able to build a relationship and maybe change some votes on future bills, future bills for the care and the compassion toward these women, these

children, and these families in the future. This particular bill seeks to delay or dissuade a woman's right to choose through isolating her by the threat of civil or criminal prosecution or professional ruin of anyone who attempts to help her. **And so, I rise in opposition for my grandmother who helped my mother, or my mother who helped countless women who faced this difficult choice and had their own conversations with God. We in this building cannot and should not seek to script an individual's conversation with their God in these most intimate moments.** So, I rise in opposition because this dissuades and seeks to isolate a woman in a very, very difficult moment from the very people who are most likely to provide her the support and the comfort in this moment. Thank you, Mr. President. Thank you, Senators.

President: Thank, thank you, Senator Eckhardt. Senator Hughes, close.

Senator Hughes: Thank you, Mr. President. Thank you, Members. I thank each of my colleagues that spoke on this bill and representing strong feelings that each of us hold and certainly folks back home hold. **I don't guess there's anything more visceral, more difficult, as far as issues that we grapple with here, than this one.** Fundamentally, this bill says that heartbeat—now I can't ask you to do this but if each one of us were to place a hand up here under our chin, we would feel that pulse because each one of us has a heartbeat—that's the sign of life. Our hearts tell us that, our heads tell us that, science tells us that. And so, when does life begin? **Folks may put the line in different places in the development of that little unborn baby.** But it's hard to argue with the fact that that heartbeat, the heart is beating, blood is pumping, there's life. That's human life worthy of protection, and as we do this, we, even with other bills we'll consider today, we want to show love and support to those mothers many of whom are in difficult, seemingly impossible situations. As we do that, let's protect that innocent human life. The most helpless, the most innocent a human can ever be. I ask for your vote "yes" on passage of the Texas Heartbeat Act.

SENATE BILL 1173 ON THIRD READING

Senator Hancock moved to suspend the regular order of business to take up for consideration **SB 1173** at this time on its third reading and final passage:

SB 1173, Relating to the regulation of abortion, including information regarding perinatal palliative care and prohibiting discriminatory abortions; authorizing disciplinary action; providing a civil remedy; creating a criminal offense.

The motion prevailed by the following vote: Yeas 19, Nays 12.

Yeas: Bettencourt, Birdwell, Buckingham, Campbell, Creighton, Hall, Hancock, Huffman, Hughes, Kolkhorst, Lucio, Nelson, Nichols, Paxton, Perry, Schwertner, Seliger, Springer, Taylor.

Nays: Alvarado, Blanco, Eckhardt, Gutierrez, Hinojosa, Johnson, Menéndez, Miles, Powell, West, Whitmire, Zaffirini.

The bill was read third time and was passed by the following vote: Yeas 19, Nays 12. (Same as previous roll call)

**COMMITTEE SUBSTITUTE
SENATE BILL 9 ON THIRD READING**

Senator Paxton moved to suspend the regular order of business to take up for consideration **CSSB 9** at this time on its third reading and final passage:

CSSB 9, Relating to prohibition of abortion; providing a civil penalty; creating a criminal offense.

The motion prevailed by the following vote: Yeas 19, Nays 12.

Yeas: Bettencourt, Birdwell, Buckingham, Campbell, Creighton, Hall, Hancock, Huffman, Hughes, Kolkhorst, Lucio, Nelson, Nichols, Paxton, Perry, Schwertner, Seliger, Springer, Taylor.

Nays: Alvarado, Blanco, Eckhardt, Gutierrez, Hinojosa, Johnson, Menéndez, Miles, Powell, West, Whitmire, Zaffirini.

The bill was read third time and was passed by the following vote: Yeas 19, Nays 12. (Same as previous roll call)

**COMMITTEE SUBSTITUTE
SENATE BILL 394 ON THIRD READING**

Senator Lucio moved to suspend the regular order of business to take up for consideration **CSSB 394** at this time on its third reading and final passage:

CSSB 394, Relating to abortion complication reporting and the regulation of drug-induced abortion procedures, providers, and facilities; creating a criminal offense.

The motion prevailed by the following vote: Yeas 19, Nays 12.

Yeas: Bettencourt, Birdwell, Buckingham, Campbell, Creighton, Hall, Hancock, Huffman, Hughes, Kolkhorst, Lucio, Nelson, Nichols, Paxton, Perry, Schwertner, Seliger, Springer, Taylor.

Nays: Alvarado, Blanco, Eckhardt, Gutierrez, Hinojosa, Johnson, Menéndez, Miles, Powell, West, Whitmire, Zaffirini.

The bill was read third time and was passed by the following vote: Yeas 19, Nays 12. (Same as previous roll call)

**COMMITTEE SUBSTITUTE
SENATE BILL 1647 ON THIRD READING**

Senator Perry moved to suspend the regular order of business to take up for consideration **CSSB 1647** at this time on its third reading and final passage:

CSSB 1647, Relating to information regarding perinatal palliative care, regulation of abortion, and the availability of certain defenses to prosecution for homicide and assault offenses; providing an administrative penalty; creating a criminal offense.

The motion prevailed by the following vote: Yeas 19, Nays 12.

Yeas: Bettencourt, Birdwell, Buckingham, Campbell, Creighton, Hall, Hancock, Huffman, Hughes, Kolkhorst, Lucio, Nelson, Nichols, Paxton, Perry, Schwertner, Seliger, Springer, Taylor.

Nays: Alvarado, Blanco, Eckhardt, Gutierrez, Hinojosa, Johnson, Menéndez, Miles, Powell, West, Whitmire, Zaffirini.

The bill was read third time and was passed by the following vote: Yeas 19, Nays 12. (Same as previous roll call)

**COMMITTEE SUBSTITUTE
SENATE BILL 802 ON THIRD READING**

Senator Paxton moved to suspend the regular order of business to take up for consideration **CSSB 802** at this time on its third reading and final passage:

CSSB 802, Relating to a required resource access assistance offer before an abortion is performed or induced.

The motion prevailed by the following vote: Yeas 20, Nays 11.

Yeas: Bettencourt, Birdwell, Buckingham, Campbell, Creighton, Hall, Hancock, Huffman, Hughes, Kolkhorst, Lucio, Nelson, Nichols, Paxton, Perry, Schwertner, Seliger, Springer, Taylor, Zaffirini.

Nays: Alvarado, Blanco, Eckhardt, Gutierrez, Hinojosa, Johnson, Menéndez, Miles, Powell, West, Whitmire.

The bill was read third time.

Senator Taylor offered the following amendment to the bill:

Floor Amendment No. 1 on Third Reading

Amend **CSSB 802** on third reading in SECTION 1 of the bill, between added Sections 171.01205(c) and (d), Health and Safety Code, by adding the following appropriately lettered subsection and relettering subsequent subsections and cross-references to those subsections accordingly:

() A care agent who obtains information that the pregnant woman is a victim of human trafficking or coercion of abortion may:

(1) submit a report to the appropriate law enforcement agency of the suspected human trafficking or coercion of abortion, if, before submitting the report, the care agent:

(A) provides a written disclosure to the pregnant woman that the woman's identifying information will be provided in the report; and

(B) after receiving the written disclosure described by Paragraph (A), the pregnant woman consents to the care agent submitting the report; or

(2) provide to the pregnant woman information on the methods available for the woman to report human trafficking or coercion of abortion to the appropriate law enforcement agency.

The amendment to **CSSB 802** was read and was adopted by a viva voce vote.

All Members are deemed to have voted "Yea" on the adoption of Floor Amendment No. 1 on Third Reading.

CSSB 802 as amended was finally passed by the following vote: Yeas 20, Nays 11.

Yeas: Bettencourt, Birdwell, Buckingham, Campbell, Creighton, Hall, Hancock, Huffman, Hughes, Kolkhorst, Lucio, Nelson, Nichols, Paxton, Perry, Schwertner, Seliger, Springer, Taylor, Zaffirini.

Nays: Alvarado, Blanco, Eckhardt, Gutierrez, Hinojosa, Johnson, Menéndez, Miles, Powell, West, Whitmire.

REPORT OF COMMITTEE ON NOMINATIONS

Senator Buckingham submitted the following report from the Committee on Nominations:

We, your Committee on Nominations, to which were referred the following appointments, have had same under consideration and report them back to the Senate with a recommendation that they be confirmed:

Member, Board for Lease of Texas Department of Criminal Justice Lands: Erin Elizabeth Lunceford, Harris County.

Member, Board for Lease of Texas Parks and Wildlife Lands: Clifton Earl Bickerstaff, Potter County.

Members, Board of Pardons and Paroles: David Gutierrez, Bell County; Edward Ray Robertson, Travis County.

Commissioners, Board of Pilot Commissioners for Galveston County Ports: Arden Cyril Hill, Galveston County; Charles Frederick Kuebler, Galveston County; Kelly Kathleen Lovell, Galveston County; Terrilyn Tarlton-Shannon, Galveston County.

Presiding Officer, Brazos County Regional Mobility Authority: Daniel Barrett Moore, Brazos County.

Presiding Officer, Cameron County Regional Mobility Authority: Frank Parker, Cameron County.

Presiding Officer, Camino Real Regional Mobility Authority: Joyce A. Wilson, El Paso County.

Member, Oversight Committee, Cancer Prevention and Research Institute of Texas: Donald R. Margo, El Paso County; Cynthia Barberio Payne, Comal County.

Chair, State Board of Education: Keven Mirk Anthony Ellis, Angelina County.

Members, Commission on State Emergency Communications: Clinton Dale Sawyer, Lamb County; Larry Layne VanSteenberg, Montgomery County.

Justice, Court of Appeals, Fourth Court of Appeals District: Lori Irene Valenzuela, Bexar County.

Members, Finance Commission of Texas: Hector J. Cerna, Maverick County; Lawrence Bryan Long, Dallas County; Sharon McCormick, Collin County; Laura Rebecca Nassri Warren, Hildago County.

Presiding Officer, Grayson County Regional Mobility Authority: Robert Weldon Brady, Grayson County.

Member, Gulf States Marine Fisheries Commission: Douglass Whitcombe Boyd, Kendall County.

Presiding Officer, Hidalgo County Regional Mobility Authority: Samuel D. Deanda, Hidalgo County.

Commissioner, Interstate Commission for Adult Offender Supervision: David Gutierrez, Bell County.

Commissioners, Board of Pilot Commissioners for Jefferson and Orange County: Christopher Stephen Guy, Jefferson County; Charles Edward Holder, Orange County; William Gates Jenkins, Jefferson County; Shawn Michael Sparrow, Jefferson County; Milton Bradley Taylor, Orange County.

Members, Board of Directors, Lower Neches Valley Authority: Steven Robert Lucas, Jefferson County; James Michael Scott, Jefferson County; Charles Spurlock, Tyler County.

Member, Board of Directors, North Texas Tollway Authority: Frankie Gravely, Grayson County.

Members, Parks and Wildlife Commission: James Edward Abell, Smith County; Jeffery Dee Hildebrand, Harris County; Robert L. Patton, Tarrant County.

Member, Public Safety Commission: Steven Hall Stodghill, Dallas County.

Member, School Land Board: Todd Allen Williams, Dallas County.

Presiding Officer, Sulphur River Regional Mobility Authority: Jay Wiley Hodge, Lamar County.

Members, Texas Alcoholic Beverage Commission: Michael S. Adkins, El Paso County; Hasan Mack, Travis County; Deborah Gray Marino, Bexar County.

Members, Texas Farm and Ranch Lands Conservation Council: Abby Lynn Frank, Washington County; Leslie L. W. Kinsel, La Salle County; Natalie Cobb Koehler, Bosque County; Romey Lynn Swanson, Travis County.

Members, Texas Lottery Commission: Cynthia Anne Foster Lyons Fields, El Paso County; Erik C. Saenz, Harris County; James Higbie Clement Steen, Harris County.

Members, Texas Low-Level Radioactive Waste Disposal Compact Commission: Brandon Troy Hurley, Tarrant County; John J. Mundy, Travis County.

Adjutant General, Texas Military Department: Tracy Ray Norris, Travis County.

Member, Board of Directors, Texas Mutual Insurance Company: Brett Baker Flagg, Denton County.

Members, Texas State Board of Examiners of Marriage and Family Therapists: Russell Floyd Bartee, Tarrant County; Jodie L. Elder, Dallas County; Daniel Wayne Parrish, Dallas County; Anthony Charles Scoma, Travis County; Jeanene Lea Smith, Travis County; Evelyn Husband Thompson, Harris County.

Members, Texas State Library and Archives Commission: David Champion Garza, Cameron County; Bradley Scott Tegeler, Travis County.

Member, Board of Regents, Texas State Technical College System: Kathy Ann Stewart, Tom Green County.

Members, Texas Transportation Commission: James Bruce Bugg, Bexar County; Robert Carl Vaughn, Dallas County.

Members, Texas Veterans Commission: Mary Lopez Dale, Williamson County; Mike Perez Hernandez, Taylor County.

Members, Board of Regents, University of Houston System: Guadalupe Cantu, Hidalgo County; John A. McCall, Houston County.

Members, Board of Regents, University of North Texas System: Melisa A. Denis, Tarrant County; Daniel R. Feehan, Tarrant County.

Presiding Officer, Webb County-City of Laredo Regional Mobility Authority: Jed Alton Brown, Webb County.

NOTICE OF CONSIDERATION OF NOMINATIONS

Senator Buckingham gave notice that tomorrow she would submit to the Senate for consideration nominations to agencies, boards, and commissions of the state.

SENATE RULES SUSPENDED (Posting Rules)

On motion of Senator Hancock and by unanimous consent, Senate Rule 11.10(a) and Senate Rule 11.18(a) were suspended in order that the Committee on Business and Commerce might meet today.

SENATE CONCURRENT RESOLUTION 37

The President laid before the Senate the following resolution:

WHEREAS, Section 17, Article III, Texas Constitution, provides that neither house of the legislature may adjourn for more than three days without the consent of the other house; now, therefore, be it

RESOLVED by the 87th Legislature of the State of Texas, That each house grant the other permission to adjourn for more than three days during the period beginning on Wednesday, March 31, 2021, and ending on Tuesday, April 6, 2021.

WHITMIRE

SCR 37 was read.

On motion of Senator Whitmire and by unanimous consent, the resolution was considered immediately and was adopted by the following vote: Yeas 31, Nays 0.

COMMITTEE SUBSTITUTE SENATE BILL 12 ON SECOND READING

Senator Hughes moved to suspend the regular order of business to take up for consideration **CSSB 12** at this time on its second reading:

CSSB 12, Relating to complaint procedures and disclosure requirements for social media platforms and to the censorship of users' expressions by an interactive computer service.

The motion prevailed by the following vote: Yeas 19, Nays 12.

Yeas: Bettencourt, Birdwell, Blanco, Buckingham, Campbell, Creighton, Eckhardt, Hall, Hancock, Huffman, Hughes, Kolkhorst, Nelson, Nichols, Paxton, Perry, Schwertner, Springer, Taylor.

Nays: Alvarado, Gutierrez, Hinojosa, Johnson, Lucio, Menéndez, Miles, Powell, Seliger, West, Whitmire, Zaffirini.

The bill was read second time.

Senator Hughes offered the following amendment to the bill:

Floor Amendment No. 1

Amend **CSSB 12** (senate committee printing) in SECTION 3 of the bill as follows:

(1) Between added Sections 143A.003 and 143A.004, Civil Practice and Remedies Code (page 4, between lines 67 and 68), insert the following:

(d) This chapter does not apply to censorship of an expression that is the subject of a referral or request from an organization whose purpose is to prevent the sexual exploitation of children and protect survivors of childhood sexual abuse from ongoing harassment.

(2) In added Section 143A.005, Civil Practice and Remedies Code (page 5, line 3), between the underlined period and "This", insert "(a)".

(3) Between added Sections 143A.005 and 143A.006, Civil Practice and Remedies Code (page 5, between lines 8 and 9), insert the following:

(b) This chapter may not be construed to prohibit or restrict an interactive computer service from authorizing or facilitating a user's ability to censor specific expression at the request of that user.

The amendment to **CSSB 12** was read and was adopted by a viva voce vote.

All Members are deemed to have voted "Yea" on the adoption of Floor Amendment No. 1.

Senator Blanco offered the following amendment to the bill:

Floor Amendment No. 2

Amend **CSSB 12** (senate committee printing) in SECTION 3 of the bill, between added Sections 143A.003 and 143A.004, Civil Practice and Remedies Code (page 4, between lines 67 and 68), by inserting the following:

(e) This chapter does not apply to censorship of an expression that directly incites criminal activity or consists of specific threats of violence targeted against a person or group because of their race, color, disability, religion, national origin or ancestry, age, sex, or status as a peace officer or judge.

The amendment to **CSSB 12** was read and was adopted by a viva voce vote.

All Members are deemed to have voted "Yea" on the adoption of Floor Amendment No. 2.

Senator Gutierrez offered the following amendment to the bill:

Floor Amendment No. 3

Amend **CSSB 12** (senate committee printing), in SECTION 2 of the bill (page 1, line 60), by striking "100" and substituting "25".

The amendment to **CSSB 12** was read and failed of adoption by the following vote: Yeas 10, Nays 21.

Yeas: Alvarado, Eckhardt, Gutierrez, Hinojosa, Johnson, Menéndez, Miles, West, Whitmire, Zaffirini.

Nays: Bettencourt, Birdwell, Blanco, Buckingham, Campbell, Creighton, Hall, Hancock, Huffman, Hughes, Kolkhorst, Lucio, Nelson, Nichols, Paxton, Perry, Powell, Schwertner, Seliger, Springer, Taylor.

CSSB 12 as amended was passed to engrossment by the following vote: Yeas 18, Nays 13.

Yeas: Bettencourt, Birdwell, Blanco, Buckingham, Campbell, Creighton, Hall, Hancock, Huffman, Hughes, Kolkhorst, Nelson, Nichols, Paxton, Perry, Schwertner, Springer, Taylor.

Nays: Alvarado, Eckhardt, Gutierrez, Hinojosa, Johnson, Lucio, Menéndez, Miles, Powell, Seliger, West, Whitmire, Zaffirini.

ACKNOWLEDGMENT

The President acknowledged the presence of Congressman Pat Fallon.

The Senate welcomed its guest.

**SENATE RULES SUSPENDED
(Posting Rules)**

On motion of Senator Campbell and by unanimous consent, Senate Rule 11.10(a) and Senate Rule 11.18(a) were suspended in order that the Committee on Veteran Affairs and Border Security might meet today.

CO-AUTHORS OF SENATE BILL 5

On motion of Senator Nichols, Senators Alvarado, Birdwell, Creighton, Gutierrez, and Hughes will be shown as Co-authors of **SB 5**.

CO-AUTHORS OF SENATE BILL 12

On motion of Senator Hughes, Senators Hall and Paxton will be shown as Co-authors of **SB 12**.

CO-AUTHORS OF SENATE BILL 24

On motion of Senator Huffman, Senators Creighton, Nelson, Schwertner, Seliger, and West will be shown as Co-authors of **SB 24**.

CO-AUTHOR OF SENATE BILL 64

On motion of Senator Nelson, Senator Zaffirini will be shown as Co-author of **SB 64**.

CO-AUTHOR OF SENATE BILL 98

On motion of Senator Menéndez, Senator Miles will be shown as Co-author of **SB 98**.

CO-AUTHOR OF SENATE BILL 106

On motion of Senator Menéndez, Senator Hinojosa will be shown as Co-author of **SB 106**.

CO-AUTHORS OF SENATE BILL 155

On motion of Senator Perry, Senators Hall and Taylor will be shown as Co-authors of **SB 155**.

CO-AUTHOR OF SENATE BILL 243

On motion of Senator Eckhardt, Senator Menéndez will be shown as Co-author of **SB 243**.

CO-AUTHOR OF SENATE BILL 253

On motion of Senator Menéndez, Senator Miles will be shown as Co-author of **SB 253**.

CO-AUTHOR OF SENATE BILL 260

On motion of Senator Menéndez, Senator Eckhardt will be shown as Co-author of **SB 260**.

CO-AUTHORS OF SENATE BILL 343

On motion of Senator Kolkhorst, Senators Bettencourt, Hinojosa, Perry, and West will be shown as Co-authors of **SB 343**.

CO-AUTHOR OF SENATE BILL 632

On motion of Senator Buckingham, Senator West will be shown as Co-author of **SB 632**.

CO-AUTHOR OF SENATE BILL 706

On motion of Senator Lucio, Senator Seliger will be shown as Co-author of **SB 706**.

CO-AUTHORS OF SENATE BILL 788

On motion of Senator Creighton, Senators West and Zaffirini will be shown as Co-authors of **SB 788**.

CO-AUTHOR OF SENATE BILL 930

On motion of Senator Zaffirini, Senator Kolkhorst will be shown as Co-author of **SB 930**.

CO-AUTHOR OF SENATE BILL 941

On motion of Senator Buckingham, Senator Gutierrez will be shown as Co-author of **SB 941**.

CO-AUTHOR OF SENATE BILL 1248

On motion of Senator Creighton, Senator Hall will be shown as Co-author of **SB 1248**.

CO-AUTHOR OF SENATE BILL 1377

On motion of Senator Johnson, Senator Hinojosa will be shown as Co-author of **SB 1377**.

CO-AUTHOR OF SENATE BILL 1603

On motion of Senator Kolkhorst, Senator Birdwell will be shown as Co-author of **SB 1603**.

CO-AUTHOR OF SENATE BILL 1647

On motion of Senator Perry, Senator Lucio will be shown as Co-author of **SB 1647**.

CO-AUTHOR OF SENATE BILL 2092

On motion of Senator Hughes, Senator Hinojosa will be shown as Co-author of **SB 2092**.

RESOLUTIONS OF RECOGNITION

The following resolutions were adopted by the Senate:

Memorial Resolutions

SR 209 by Schwertner, In memory of William Henry Peckham III.

SR 211 by Hughes, In memory of Wilson M. Dickson.

SR 213 by Lucio, In memory of Charlotte Han Sharp.

Congratulatory Resolutions

SR 210 by Schwertner, Recognizing the 150th anniversary of the City of Bryan.

SR 212 by Schwertner, Recognizing Tom and Ginny Holloway on the birth of their son, Graham Charles Holloway II.

HCR 68 (Hinojosa and Lucio), Commending former Hidalgo County Judge Ramon Garcia for his service.

HCR 70 (Nelson), Congratulating Southwest Airlines on its 50th anniversary.

RECESS

On motion of Senator Whitmire, the Senate at 5:17 p.m. recessed until 1:00 p.m. tomorrow.

APPENDIX

COMMITTEE REPORTS

The following committee reports were received by the Secretary of the Senate in the order listed:

March 30, 2021

FINANCE — CSSB 1

WATER, AGRICULTURE AND RURAL AFFAIRS — CSSB 634, CSSB 905, CSSB 1160, CSSB 387, CSSB 600

STATE AFFAIRS — CSSB 1018, CSSB 29

FINANCE — SB 1156, SB 742, SB 478, SB 477, SB 813, SB 220, SB 851, SB 197, SB 1336

BILLS ENGROSSED

March 30, 2021

SB 8, SB 9, SB 196, SB 343, SB 394, SB 601, SB 802, SB 863, SB 872, SB 873, SB 941, SB 1173, SB 1647

RESOLUTIONS ENROLLED

March 30, 2021

SR 198, SR 205, SR 206, SR 209, SR 210, SR 211, SR 212, SR 213

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT,
FOR THE SOUTHERN DISTRICT OF TEXAS,
HOUSTON DIVISION

The Satanic Temple, Inc.,
Plaintiff

v.

Cecile Young, health commissioner,
Defendant.

DECLARATION OF LUCIEN GREAVES



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crown.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW Lucien Greaves, who states as follows under penalty of perjury.

1. I am Lucien Greaves. I cofounded The Satanic Temple in 2013 and have been a director of The Satanic Temple and its spokesperson since its founding.
2. Satanism is a religion that explores questions of universal and personal significance, and of the utmost importance to its adherents.
3. Since the founding of The Satanic Temple, I have met many Satanists who have stated that The Satanic Temple has helped them find meaning in their lives, and some credit The Satanic Temple with saving their lives from destructive behaviors, practices, or states of mind.
4. The Satanic Temple has specific tenets which define our ethics, ritual practices that are engaged in by our congregants and membership, a large following that identifies as Satanists, and a community bound together in Satanic practice.
5. Satanism espouses its own affirmative values which are not, and never have been, dependent upon the values of other religious communities or organizations.
6. Whether or not other religious identities or organizations renounce or defend the right to abortion access is irrelevant to our position regarding abortion.
7. Whether or not any other sect, religious identity, organization, or individual feels uncomfortable in recognizing Satanism as a religion is irrelevant to the fact that The Satanic Temple is a religious organization populated by a membership who practice and identify with Satanism.

8. The Satanic Temple believes that the right to have an abortion is fundamental to the bodily autonomy we enshrine in our third tenet, “the body is inviolable, subject to one’s own will alone.”

9. The Satanic Temple has an abortion ritual for pregnant Satanists to engage in when terminating their pregnancy as a way to help them navigate through any emotional difficulties they may experience, and to help them contextualize the abortion within the framework of their religious values.

10. Prohibitions against abortion are being imposed on Satanists based upon a religious belief that Satanists do not share, specifically the belief that “life begins at conception.”

11. The abortion ritual will exist for Satanists whether or not the right to abortion is recognized in states where Satanists seek to terminate their pregnancies.

12. The principle of Free Exercise demands that the government not intervene in our practice of a religious ritual, and Satanists are seeking to have their religious liberties recognized in asking the courts to affirm the most basic and fundamental principle of free exercise.

13. A court failing to recognize our claim for free exercise, and upholding the right of a state to intervene in our abortion ritual, will be acting not only against Satanists, but against the constitution of the United States, against established legal precedent, and against the best interests of a free and democratic society.

14. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Lucien Greaves, in Essex County, MA on August 22, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

LADY ABIGOR’S STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crowne.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW Lady Abigor, who states as follows under penalty of perjury:

1. My name is Lady Abigor. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.
2. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
3. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs.
4. I have been involved with TST since 2017 when I joined the Atlanta chapter (congregation). I integrated into the congregation to later become the part of the Leadership Council admin where my role is to help foster connections between members in a covid environment.
5. I have been a Caretaker of The Satanic Estate (“**TSE**”) since 2021. TSE is the virtual headquarters of The Satanic Temple which began in 2020. TSE is a volunteer organization in consisting of volunteers named Caretakers who give thousands of hours of their free time to provide a virtual meeting space for Satanic and Satan Adjacent members to connect with others, attend Temple services, celebrate TST holidays, and more. TSE’s contribution is a valuable and long-lasting one that continues to unite members.
6. My congregation, TST Atlanta, holds an annual “Menstruatin’ with Satan” in collaboration with the Atlanta Women’s Center where we collect donations of feminine hygiene products for people in need, such as pads, tampons, and personal cleansing wipes. We have also held outreach efforts for the Atlanta Food Bank to provide blankets, and shelf-stable food products for Atlanta residents in need.

7. My expression of my Satanic faith shows in my work with TSE and my local congregation in Atlanta. The Seven Tenets have provided me with clarity and direction on how to be a more empathic, and understanding person. I hold my faith strongly, which was a part of my decision to become a Minister of Satan in 2021.
8. I am an active participant in my local congregation's "Tenet Talks" each Thursday where congregation members discuss one of the "Seven Tenets" to provide thoughtful feedback and questions to be discussed in a group setting. I'm grateful to be a part of this organization and for how much TST has meant to others. TST has been such a positive influence with its various campaigns and outreach initiatives.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Lady Abigor, in Fulton County, GA on August 21, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

CHALICE BLYTHE’S STATEMENT



Matt Kezhaya

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333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW Chalice Blythe, who states as follows under penalty of perjury:

My name is Chalice Blythe. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.

1. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
2. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs.
3. I have been involved with The Satanic Temple (TST) since 2014 when I became a member. Since joining TST, I have been involved with TST in numerous ways and held various roles.
4. I founded the first Utah Chapter (TSTUT) in 2016 as a Chapter Head (CH). This included vetting members applying to be members of the chapter, organizing and running monthly member meetings, running public education gatherings, writing rituals (Unbaptisms and Destruction Rituals) and organizing chapter events. I also established one of three operational After School Satan Clubs (ASSC) at Vista Elementary School when the campaign first launched.
5. From 2017 - 2020, I served as a member of National Council/International Council (NC/IC), which oversaw the organization’s Chapters and provided advice to TST’s Executive Ministry. In that role, I acted as a point of contact between various chapters and NC/IC, as well as providing guidance/support for chapters under my purview. I helped create and implement many new and revised policy documents for the expanding organization. This role also included providing support and guidance for general TST operations in tandem with Executive Ministry.

6. From 2017 – 2018, I served as the Director of TST’s After School Satan Club (ASSC) campaign. This included expanding the program from its initial scope to opening the campaign up to vetted volunteers. This included interviewing and training volunteers, creating handbooks and materials, assisting in school applications and other administrative support. I also provided spokesperson support for local and international media.

7. In August 2020, I founded the Suryan Council (SurCo), TST’s human resource group. This included creating/implementing SurCo structure, scope of work, policies, and supporting documents. I helped established a complaint reporting structure for the organization and investigating complaints submitted to SurCo.

8. I was a researcher, lesson writer, and lesson presenter for TST’s ordination program.

9. In March 2021, I became the first woman to become an Ordained Minister of Satan through TST’s Ministry program. In this role, I have overseen a handful of marriage ceremonies and a few private ritual events. I have also led several religious services.

10. In April 2021, I collaborated with the Grey Faction Campaign to create and run their inaugural World Congress on Moral Panics Conference. This included scheduling and programming, recruiting presenters, coordinating with the online Estate platform, advertising, and hosting.

11. In the summer of 2021, I was recruited onto TST’s Ordination Council (OrdCo). In my role on OrdCo, I oversee the ordination of Ministers of Satan as well as provide administrative support for the general operations of the Ministry Program.

12. In November 2021, I created and ran the inaugural Satanic Ministry Conference. This included scheduling and programming, recruiting presenters, coordinating with the online Estate platform, advertising, and hosting.

13. In February 2022, I helped coordinate and plan TST's inaugural SatanCon in Scottsdale, Arizona. As Programming Director, I created the conference schedule, recruited and coordinated with presenters/panelists, and provided general conference support. I coordinated all media inquiries and interviews. I am still the Programming Director for the SatanCon campaign and actively working on SatanCon 2023.

14. Most recently, I have been appointed as a Media Relations Specialist. In that role, I talk to media outlets, provide interviews for podcasts and YouTube shows, work with students and researchers, and speak at academic institutions and symposia. I still serve in this capacity as of this writing.

15. I became and I remain a member of TST, as well as continue to do the work I do, because I am a religious non-theistic Satanist and believe that TST's tenets, interpretation and application of non-theistic Satanism best aligns with my own religious views and values. TST is my church and the work I do is an active expression of my faith.

16. TST has given me a religious community that I feel at home in and has given me the opportunity to actively contribute to its growth. TST has given me the opportunity to find a greater meaning to life, as well as given me a source of pride, happiness, fulfillment, and a greater sense of purpose. TST allows me to actively express and live my religious values, which in turn deepens my spiritual health and wellbeing.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Chalice Blythe, in Pima County, Arizona on August 21, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

DEX DESJARDINS’ STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crowncrown.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW Dex Desjardins, who states as follows under penalty of perjury:

My name is Dex Desjardins. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.

1. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
2. I am a member of The Satanic Temple (“TST”) and hold its tenets as sincere religious beliefs.
3. I have been involved with The Satanic Temple (TST) since I first joined in July 2015.
4. Since joining TST, I have been involved in numerous ways. I co-founded and co-led a TST-oriented community group in November 2016 that was rebranded as the TST Albany Chapter in February 2018. I served as Chapter Head of the Albany Chapter from February 2018 until January 2020. During that time, I ran monthly Chapter meetings, oversaw the Chapter’s educational programming and project management, participated in membership onboarding and the appointment of leadership council members, and facilitated communication between the Chapter and TST’s larger organization and community. I briefly served as the Chapter’s media liaison between January and April 2020. After our chapters were transitioned into congregations, I was Regent over the Albany Congregation from July 2021 onward.
5. From April 2020 to November 2020, I served on TST’s International Council, which oversaw the organization’s Chapters and provided advice to TST’s Executive Ministry. In my role on the International Council, I helped establish our organization-wide recognition ceremony and award categories, I consulted on the development of our holidays, and I worked on numerous policy documents. I also worked with community groups that were working

toward chapter status in Maine, Ohio, Oklahoma, Utah, and Western New York.

6. I was a researcher, lesson writer, and lesson presenter for TST's ordination program.

7. Starting in November 2020, I was recruited onto TST's newly formed Ordination Council. In my role on the Ordination Council, I oversee the development of elective lessons that Ministers of Satan can take to fulfill their continuing education requirement for ordination renewal. I have overseen the ordination of dozens of Ministers of Satan. I also researched, wrote, and presented an elective lesson for ordination renewal.

8. In April 2021, I was ordained as a Minister of Satan. I have given several religious services and officiated marriages in that role.

9. Most recently, I have been appointed a Media Relations Specialist. In that role, I talk to media outlets, provide interviews for podcasts and YouTube shows, work with students and researchers, and speak at academic institutions and symposia.

10. I became and I remain a member of TST, and I do the work that I do in TST, because I am a religious non-theistic Satanist and TST's interpretation of religious non-theistic Satanism best aligns with my religious beliefs and values. TST is my church.

11. TST has provided me with a religious community and friends around the world. I find great value and meaning in supporting our community's religious development and in providing useful services such as the various leadership and administrative roles I've held and that I hold today. It is a source of ongoing pride and happiness to be able to participate in TST in the ways I do.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Dex Desjardins, in Rensselaer County, New York on August 21, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

MALAK GORCROW’S STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crow.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW Malak Gorcrow, who states as follows under penalty of perjury:

1. My name is Malak Gorcrow. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.
2. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
3. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs.
4. I became an ally of The Satanic Temple in 2018 by assisting with campaign promotional efforts for the local TST group. In 2020, I applied for membership in what was then known as The Friends of the Satanic Temple Ohio at the time. In early 2022, I became a full-fledged member of The Satanic Temple Ohio.
5. In early 2021, I became a Caretaker at The Satanic Estate, where my professional skills overlapped with the operational needs of the Estate. I’m also very involved in my local congregation by volunteering my time, experience, and skills toward event planning/design and our marketing and promotional efforts. I also serve as a member of our welcome committee for new members.
6. I am fortunate to be in a position where I can give back to my Satanic community through volunteering my time and sharing my skills. This community has been an essential part of strengthening and supporting my mental health during the isolation of the Covid pandemic, in addition to being extremely supportive during my personal moments of loss and tragedy. I give back because I can and so that others in my community can hopefully experience similar moments of fellowship and belonging.
7. The compassion, empathy, and support of our community is so much stronger, unconditional, and unwavering than anything I

experienced when affiliated with a Christian group. We call ourselves a SatanFam. The bonds I've developed within this community are some of the strongest friendships and personal relationships I've had in my life and will likely last a lifetime.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Malak Gorcrow, in Franklin County, OH on August 21, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

MARILINE S GREGORI’S STATEMENT



Matt Kezhaya

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333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW Maryline S. Grigori, who states as follows under penalty of perjury:

1. My name is Maryline S. Grigori. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.
2. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
3. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs. The tenets of TST are attached to this declaration as Exhibit A-1.
4. I joined the SoCal Chapter of TST in 2019. I soon became a vetted member of the Southern Californian congregation.
5. I participated in the translations of our tenets into my native language. In June of 2020, I became Lead Organizer for the nascent group in my country of origin as I moved back with my family in Europe due to the pandemic.
6. I am a Caretaker at the Satanic Estate, where I began to volunteer in January 2021. The Satanic Estate is the virtual gathering space for our community where conferences, holiday celebrations and services are held. We coordinate weekly virtual Temple Services, annual conferences and holiday celebrations for TST Satanists and others wishing to celebrate, and practice their satanism and also express their individuality as part of our very diverse religious community since 2020.
7. Volunteers at the Satanic Estate pour thousands of hours into meticulously organizing and running inclusive, safe, fun, and educational online events. These events can include a variety of rituals, entertainment, performances and presentations. We have had science based and history based presentations such as guided historically accurate tours of Salem, MA. We have also held lectures from

professors of religious study and psychology. We have had LGBTQIA+, harm reduction and reproductive rights presentations as well as weekly Sober Faction recovery meetings (a secular alternative to Alcoholic Anonymous). The Satanic Estate is also a place for us to regularly broadcast videos of rituals which are live streamed by congregations and their Ministers. A benediction by a Satanic Minister opens each holiday event and an invocation starts each Temple Service.

8. My role has adapted depending on what is needed but mainly consists in promoting our events to our community and allies. It involves daily networking and social media management; weekly meetings, task management and newsletters edition as well as event production and coordination for each annual conference or holiday months ahead of time. We have been sent many testimonies from attendees at the Estate praising their experience. I have personally received a considerable amount of very positive feedback on a near daily basis and often read messages of gratitude sent to the Estate, The Satanic Temple, and the community expressing the joy that TST has brought to our members' lives.

9. The Estate offers attendees a way of congregating that most online or even in person meetings do not allow as our platform is international, uniquely ludic and engaging as well as more approachable for many members. Attendees experience strong fellowship in our events. Our platform has been a real asset to the international community during the pandemic for members who were and, for some, remain, far apart and isolated.

10. I have been a Minister of Satan since April 2022. I serve on the Satanic Weddings and the Satanic Chapel Team. This team organizes and facilitates in-person events and ceremonies for our community.

11. Since I became involved, I have participated in making our resources available to my fellow francophones by extending access

to all members, groups and congregations with a need for French versions of our materials around the world. I have also participated in transcriptions of some of our virtual conference lectures into text to extend access to our hearing-impaired members.

12. I have been part of cohesive decision making and community building internationally since I joined the community. I have participated in the international expansion of the Satanic Temple by encouraging exchanges with and between local communities and members.

13. As part of Satanic Weddings and the Satanic Chapel teams, I participate in the management of our online presence. I create and maintain our social media accounts website and online store. Our team organizes and facilitates in person public and private religious events and ceremonies such as weddings, Movie Nights or fundraising events. We offered hundreds of people a way to practice their religion in some of the most intimate and meaningful ways to them by involving them as much as possible in the crafting of their ceremony with the guidance of Ministers and professionals. We provide an opportunity for our members to express their autonomy and individuality on very special occasions. Providing legally binding ceremonies is a way for our celebrants to have their deeply held beliefs recognized like members of any religion do.

14. I have also served as a volunteer in TST's Ukrainian Aid Program. We provide financial aid directly to TST members in Ukraine. The funds allocated to this campaign have been used to secure housing and provide basic needs like food, clothing, and medical care. This program helped provide temporary relief to members fleeing Ukraine until they were able to find aid through larger organizations with more means and resources. Being from Europe and an immigrant from a modest family who had to deal with relocating, food insecurity and starting anew to foreign countries, it was personally fulfilling to know I was able to help Ukrainian TST members in dire need. I am still in contact with the family

I was assigned to and I am happy to see them being safe and happier and will continue to do my best to bring them.

15. As a Minister of Satan I have led several Temple Services on bodily autonomy and ethical consumerism. I have officiated unbaptism rituals through which members of the Satanic Temple can reclaim their agency by rejecting a baptism performed on them without consent when they were a child. It is a very cathartic ritual in which we can remove some of the weight and damage done by, sometimes, years of abuse and indoctrination into a religion forced upon the person it is performed on. I have seen people crying in relief after undergoing this ritual. The psychological benefits of these rituals are very often strikingly noticeable in the mood, motivation and involvement of members seeking an unbaptism.

16. Being a Minister and active member of TST has allowed me to focus on my wellbeing and what I want to achieve. I truly believe that being part of the Satanic Temple has helped me grow into being the most authentic version of myself, a version I am very proud of being. I have overcome years of trauma and guilt from my upbringing and I couldn't be prouder of helping others do the same.

17. The Satanic Estate gave me a place to call home and gather with people that I love during the holidays as I was by myself on the other side of the world. Working alongside my fellow caretakers and Ministers I have acquired new skills that I can now market in my professional life. I have made friends and formed what I believe to be unbreakable bonds. Being involved in the many ways I am is my way to show how grateful I am and "give back" to TST for improving my life so drastically.

18. As a long-time atheist, I never imagined being part of a religion and did not even know non-theistic religions existed. I have learned a great deal during my time in TST. I have found a community to embrace me and accept me for who I am, something I never had.

19. I immediately recognized myself and my way of life in the Seven Tenets and have reflected and been much more aware of my choices and state of mind every day since I first read them. They are ideals that help me to be the best version of myself. They have taught me to hold myself to a higher esteem and standard. Being a member of The Satanic Temple has not only improved my life it quite literally saved my life on multiple occasions thanks to the support and guidance of my friends in the community in desperate times. I have found purpose when I was at a loss. I have found truly loving, selfless and compassionate people who share the values I hold dear.

20. I am incredibly honored to help it grow and participate in bringing it together. Being able to contribute in TST' s effort of bettering so many lives is a privilege and the trust and support of our community, our leadership and all allies expressing is an inestimable gift.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Maryline S Grigori, in Dublin, Ireland on August 20, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

RENÉ GRIGORI’S STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crowncrown.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW René Grigori, who states as follows under penalty of perjury:

1. My name is René Grigori. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.
2. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
3. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs. The tenets of TST are attached to this declaration as Exhibit A-1.
4. I have been involved with TST since 2018 when I joined the Friends of TST Inland Empire group. When TST Southern California (SoCal) became an official Chapter/Congregation in July 2019 our group was incorporated as one of five Divisions within the Congregation and I became co-lead of the Inland Empire Division.
5. In early 2020 I took on the role of Congregational Spokesperson for TST SoCal. In this role I’ve been interviewed by members of the media, appeared in podcasts, and have helped university students with various religious studies interviews.
6. In May 2021 I became the first ordained TST Minister of Satan in California. In that role I have led numerous rituals and services at our virtual temple.
7. I am also one of the members of our Temple Services team. Our role is to ensure that we have ministers available for services and to help prepare for those services.
8. Through the 7 Tenets of TST I see the compassion, wisdom, and persistence by which our religious community seeks to make our world a better place to live.

9. My journey with TST has been incredibly fulfilling and I've been afforded many opportunities to give back to the community; in this I've been very fortunate.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ René Grigori, in Riverside County, CA on August 21, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“**TST**”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

HARRY HOOFCLOPPEN’S STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crowncrown.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW Harry Hoofcloppen, who states as follows under penalty of perjury:

1. My name is Harry Hoofcloppen. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.
2. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
3. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs. The tenets of TST are attached to this declaration as Exhibit A-1.
4. I have been involved with TST since 2018 when I joined the Colorado chapter (congregation). I found my way into leadership there, and then I joined the International Council to help provide cohesive governance for all TST chapters worldwide.
5. I am currently the Director of the SatanCon Campaign, coordinating an annual, in-person meet-up of hundreds of TST Satanists from around the world to share in the fellowship and community of our religion. I oversee volunteers of the SatanCon Campaign who devote thousands of hours into every detail of running a safe, fun convention that includes presentations on dozens of topics including our reproductive rights as Satanists, our engagement in BIPOC communities, and even a book club; entertainment including music, art, and literature; and rituals including baptisms, weddings, and more.
6. I find that this event is transformative by allowing participants to experience the community in a way that online meetings alone do not allow. Just like every other religion, we feel enormous fellowship when we meet in person.

7. This is how I “give back” to TST for improving my life... for giving me religion in a way that, as a former atheist, I never imagined possible.

8. When I was an atheist, I had no community, no positive set of beliefs showing me how to be a better person. TST’s Seven Tenets provide exactly that.

9. The Seven Tenets stand as codified ideals that I try to hold myself to daily. Being a member of The Satanic Temple has improved my life tremendously. I will always be grateful for this gift.

10. It gives me immense pride in our community and an incredible sense of our shared purpose. I’m honored to be able to contribute my effort this way.

11. I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER AFFIANT SAYETH NOT.

/s/ Harry Hoofcloppen, in Larimer County, Colorado on August 20, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

MOBIUS’ STATEMENT



Matt Kezhaya

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Minn. # 0403196

matt@crowne.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW, mobius who states as follows under penalty of perjury:

My name is mobius. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.

1. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
2. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs.
3. I joined The Satanic Temple (TST) as a member in 2019. In February of 2022 I became a Caretaker of The Satanic Estate. The Satanic Estate is comprised of a small group of TST members around the world who manage and facilitate TST’s online religious services, events, and campaigns via virtual meeting spaces collectively known as The Estate.
4. As a Caretaker, I am personally responsible for facilitating meetings between our congregants and presenters on a weekly basis for Temple services. Further, I have been involved with several campaigns, provided technical assistance for The Estate, and streamed a live event that occurred in Cambridge, MA on 8/3/22. In short, I play a supporting role to ensure our ministers and presenters can connect with our members virtually, to provide a space for our religious events, and for our community of members to congregate.
5. I do this willingly and proudly. I fully support the mission of The Satanic Temple in our efforts to make sure the voice of minority religions are represented in the public square. I believe that if we do not protect our right to believe and practice a non-theistic worldview by being a constant presence and reminder of the Rights that the Constitution guarantees to all citizens. I believe that the only way for minority religions to avoid the tyranny of the majority is to speak up when our Rights are threatened.

6. By helping to provide a safe space for our community to congregate, I feel a great sense of pride and accomplishment. Through The Satanic Temple, I feel welcome in a space that was created to shelter those who are considered outsiders. I am fortunate to be in a position that enables me to provide that sense of community to others. This feeling was something that I lost, and didn't know I desired when I left Christianity nearly three decades ago. I know that our pursuits are noble, and I swell with pride that through our work we can help amplify the voices of those who feel voiceless.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ mobius, in Oklahoma County, Oklahoma on August 21, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

CECELIA PECKERTON’S STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crown.law

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general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW, Cecelia Peckerton who states as follows under penalty of perjury:

My name is Cecelia Peckerton. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.

1. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
2. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs.
3. I have been involved with TST since 2019 when I joined the Illinois congregation (formerly known as the TST Chicago Chapter.)
4. My service to TST’s worldwide Satanic takes the form of several roles. During my time with TST, I have:
 - i. served in leadership positions where we helped create & structure a new local congregation that better served all members in the state of IL, ensuring that all members felt engaged, supported, and connected (especially during the start of the pandemic in 2020.)
 - ii. I host weekly social events online to watch movies and congregate, giving us a safe space to connect with one another while in the safety of our homes.
 - iii. I have also participated in fundraising campaigns for fellow TST members in need of financial support due to unforeseen circumstances or sudden life changes.
 - iv. I help manage and answer support inquiries for our social media pages related to our weekly services; this includes helping members troubleshoot their devices and

assist with any login issues, as well as providing information about our weekly Temple Tuesday Services and the activities that take place after services end, such as TST Sober Faction, our writing club, arts & crafts club, and the fantasy tabletop role-playing game club.

- v. I was part of the Ukrainian Aid campaign that TST launched to help our members whose lives were affected by the Russian invasion of Ukraine.

5. By helping TST, I have personally benefitted from my service. The TST community has given me the support I needed to learn to stand on my own two feet. I am a better person and a valuable member of society because of the tools TST has given me. TST taught me how to rise above adversity to pursue my dreams and goals. I have learned to do the work and trust the process because of TST and therefore, I volunteer my time to give back and help others after me be able to also find a community that welcomes, accepts, and uplifts them in ways no one else in their life ever did or refused to.

6. I feel like it is my duty to protect my Satanic community and ensure that I do my part so that we continue to have a space to feel safe and accepted, while simultaneously ensuring that the focus is on our community's health and overall wellness above anything else.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Cecelia Peckerton, in Cook County, Illinois on August 21, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. and Ann Doe,
Plaintiffs

v.

Cecile Young, in her official capacity,
Defendant.

APPENDIX



Matt Kezhaya

Ark. # 2014161

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333 N. Washington Ave # 300, Minneapolis, MN 55415

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4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

LUNA DE PLATA’S STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crown.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW, Luna de Plata, who states as follows under penalty of perjury:

My name is Luna de Plata. I am over the age of 18, of sound mind, and am capable of making this unsworn statement.

1. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
2. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs.
3. I joined The Satanic Temple in 2014 and a member of the TST Houston congregation since 2022. The reason I did not join a local congregation sooner was because I live far away from it
4. I am a member of TST’s Sober Faction, which is a Satanic and secular alternative to 12 step peer recovery programs for addiction. Sober Faction has zoom meetings at least once a day, where people in recovery meet, discuss different topics related to sobriety, and give each other support. While Sober Faction is not professional therapy, we utilize TST’s Seven Tenets and Seven Rituals which are based on science and psychology’s best understanding of addiction recovery, to work on our sobriety and better structure our personal recovery. Sober Faction has personally helped me tremendously by providing a support group that is not based on supernatural beliefs but on realistic, secular ways of self-empowerment.
5. I am a chainmail artist and frequently make jewelry for Sober Faction to auction off and raise funds for the program. It is a simple way I like to give back to my community. So far, we have been able to raise hundreds of dollars which have been used for various expenses, such as the fee for our P.O. box, a postage printer, and international mailing costs to send “Sobriety Chips” to members who reach milestones in sobriety. The funds have also been used to help print Sober Faction materials like our Seven Rituals workbooks and

journals to send to Sober Faction members in treatment and sober living facilities

6. I participated in the Ukrainian Aid Program, where we provided financial aid directly to TST members in Ukraine. The financial aid was used for housing and basic needs such as food, clothing, and medical care. Several families were forced to flee Ukraine and we were able to provide temporary housing until they were able to find aid through larger organizations who have more funding. It was personally fulfilling to know I was able to help Ukrainian TST members who were in dire need.

7. My congregation, TST Houston, is holding an annual “Menstruatin’ with Statan” drive where we collect donations of feminine hygiene products for people in need. We are still collecting donations, but thus far we have over 100 boxes of menstrual products, such as pads, tampons, and personal cleansing wipes.

8. In TST, I have found a loving, accepting community of truly compassionate people who share the values I hold dear. A good example is TST’s first Tenet, which states “One should strive to act with compassion and empathy toward all creatures in accordance with reason.”

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Luna de Plata, in Montgomery County, Texas on August 21, 2022

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT,
FOR THE SOUTHERN DISTRICT OF TEXAS,
HOUSTON DIVISION

The Satanic Temple, Inc. and Ann Doe,
Plaintiffs

v.

Cecile Young, health commissioner,
Defendant.

GREG STEVENS'S STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crowne.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW Gregory Stevens, who states as follows under penalty of perjury:

1. My name is Gregory Stevens. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.
2. I am submitting this declaration under my real name despite the risk of the catastrophic side-effects I may encounter from the controversy surrounding this case.
3. I am a member of The Satanic Temple (“TST”) and hold its tenets as sincere religious beliefs.
4. I joined TST in 2015. I was on the National Council, the body responsible for governing TST's chapters, from 2016 to 2018. I developed the technical framework for our community video streaming website ("TST TV") that launched in 2019, and I continue to provide technical and administrative support for the platform.
5. I currently serve as the Director of Ministry. I supervise the Ordination Council which is a team of five ministers who review and approve candidates for ordination, and plan and organize activities and develop resources for our community of ministers. I developed our ordination program, which launched in 2021 and forms the core religious training for our congregation leadership and other members who wish to become ordained clergy in TST.
6. To become an ordained member of TST clergy requires one to complete a ten-hour curriculum on the history and philosophy of Satanism and The Satanic Temple, pass a final exam with a score of 80% or better, write a self-development essay, pass a background check, and receive a written letter of commendation for community activities and involvement from a member of TST leadership. Every year following their ordination, Ministers of Satan must complete a one hour lesson and receive an updated letter of commendation to keep their ordination active.

7. Half of my role is project management. I brought together a team of ministers in the U.S., Europe, and Australia to manage our weekly online religious services and personally wrote out tracking and best practice documents. I personally created and maintain the "ticketing" system that the Ordination Council uses to keep track of ordination candidates as they progress through the program. I implemented an online library catalog system our ministers use to catalog books available at our congregations, as well as original scripts they have written for Satanic rituals. I hold weekly one-on-one meetings with each member of the Ordination Council to make sure they are making progress with their own projects to help our ministerial community.

8. Half of my role is being a minister for our ministers. I make myself available to hear frustrations and concerns from ministers, offering them advice and encouragement. I personally talk to new ministers who are nervous or unsure of themselves, answering questions about how to get tasks done and introducing them to others in our community. I meet with members and groups who have big ideas for projects and use my experience in the organization to offer suggestions for how to best achieve their goals.

9. The Satanic Temple fills a niche that I think is important and absolutely needed: a religion that provides a sense of community, shared values, and shared purpose among people who otherwise find themselves to be outsiders in society. This is a religion that empowers individuals, but that is also rooted in empathy and community and compassion. These are people worth supporting, and this is a community worth nurturing.

10. When I see the pride in a new minister's eyes when they complete the ordination program, hear cheers from members of a new congregation that has become part of our church, or read a "thank you" email from a member who says that our religious services are the first time they felt connected, safe, and understood in a religious

community, I think: I helped to make that possible. This is the most meaningful work that I can imagine doing.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Gregory Stevens in Pima County, Arizona on August 21, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“TST”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

RILEY PHOEBUS’ STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

matt@crown.law

direct: (479) 431-6112

general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW Riley Phoebus, who states as follows under penalty of perjury:

1. My name is Riley Phoebus. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.
2. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
3. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs. The tenets of TST are attached to this declaration as Exhibit A-1.
4. I have been involved with TST since 2018 when I joined the Indiana chapter (congregation). I was brought onto the congregation’s Leadership Council to serve as the Social Media Specialist in 2020. I was nominated for the role of Congregation Head in 2021 and formally recognized in that position in 2022. I presently serve in this role by acting as liaison between the congregation and all external parties, presiding over all meetings and events affiliated with congregation operations, maintaining all financial documents, and delegating responsibilities to the members of the Leadership Council.
5. I currently serve as the Midwest Region Representative on the Recognition & Onboarding Committee of the Society of Congregations. In this role, I personally oversee the process of candidate groups working towards congregation status and the vetting and onboarding of Congregation Head candidates.
6. I am also a Caretaker for The Satanic Estate. The Satanic Estate is operated by Winstonian Enterprises LTD, a company affiliated with The Satanic Temple. In this role, I work closely with global vendors and my fellow Caretakers to curate an online boutique featuring artists that create unique products for Satanic

weddings. I also assist with financial operations, merchandise, and events.

7. I am also an ordained Minister of Satan through Satanic Ministry. I have performed dozens of Unbaptisms, a self-empowerment ritual that declares sovereignty from previous indoctrination.

8. I volunteer my personal time to The Satanic Temple and its affiliate organizations because I have witnessed firsthand the powerful impact it has on the community it serves. For example, The Satanic Temple Indiana's campaigns have donated to organizations that serve at-risk communities such as The Damien Center, Trinity Haven, and The Julian Center in Indianapolis, IN.

9. Being a member and leader within The Satanic Temple makes me feel fulfilled. My congregants and colleagues are like family to me and I am treated as such. I feel safe, seen, and understood. I feel that I am genuinely pursuing my purpose and I am grateful for the opportunity to serve with The Satanic Temple.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Riley Phoebus, in Marion County, IN on August 21, 2022.

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

The Satanic Temple, Inc. (“**TST**”) and Ann Doe,
Plaintiffs

v.

Cecile **Young**, in her official capacity,
Defendant.

ADA KING’S STATEMENT



Matt Kezhaya

Ark. # 2014161

Minn. # 0403196

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general: (612) 349-2216

333 N. Washington Ave # 300, Minneapolis, MN 55415

COMES NOW, Ada King who states as follows under penalty of perjury:

My name is Ada King. I am over the age of 18, of sound mind, and am capable of making this unsworn declaration.

1. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute.
2. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs.
3. I have been a Satanist since 2005. I became a member of The Satanic Temple in 2016 by co-founding the Colorado congregation. My congregation achieved official recognition status on July 6th 2017.
4. In January of 2018 I began to support Executive Ministry by booking Lucien’s speaking engagements and supporting fundraising through event development and donor outreach. I also became active in the TST Boston congregation.
5. In May of 2020, I began to direct The Satanic Estate, an online event venue where we host weekly religious services, religious holiday celebrations and religious conferences. In September of 2021, I began the Satanic Weddings program at Salem Art Gallery. In October of 2021, I became an Ordained Minister of Satan. In April of 2022, I became the director of the Ukrainian Aid program providing support to Ukrainian TST members.
6. This work is my religious expression. My religious devotion is expressed 20-80 hours per week. Connecting thousands of Satanists internationally through our events is an enormous privilege. Many of our members have never felt a sense of home. Witnessing their joy as they feel a sense of home for the first time is rewarding beyond measure. The importance of a couple performing relevant

religious traditions that accurately reflects who they are for their wedding can't be overstated.

7. Satanic ritual has been transformative and extremely sacred to me. In addition to the participating and coordinating revelatory Black Masses and Unbaptisms, I have developed a devout daily Satanic ritual practice based on my Self-Dedication Ceremony officiated in November 2021. This practice brings me peace like nothing ever has.

8. Through ritual and religiously performing the work as described above I have come to know and love myself in ways that I would never have otherwise. I do not have blood relatives and the community that I work to serve and the volunteers I work with have become my family. I do what I do to give the community the purpose and belongingness they have given me. I am originally from a conservative area that considered me worthless because of who I am and what I believe. Through Satanism and The Satanic Temple, I have learned that my life is worth living. I would not be alive if I had not found this community. It means everything to me.

I recognize that if any of the above facts are false, I risk a federal perjury charge. The above facts are true.

FURTHER YOUR AFFIANT SAYETH NOT.

/s/ Ada King, in Essex County, Massachusetts on August 22, 2022.