

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

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American Humanist Association, et al.,)	Case No. 8:14-cv-00550-DKC
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
Maryland-National Capital Park and Planning)	
Commission)	
)	
<i>Defendant,</i>)	
)	
The American Legion, et al.,)	
)	
<i>Defendant-Intervenors</i>)	
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DECLARATION OF MICHAEL L. WEINSTEIN

I, Michael L. Weinstein, hereby state and declare as follows:

1. I am the Founder and President of the Military Religious Freedom Foundation (MRFF).
2. I am a 1977 Honor Graduate from the United States Air Force Academy. I have served as a JAG officer in the US Air Force, Assistant General Counsel (White House Office of Administration) working in and for the West Wing of the Reagan administration, and the first General Counsel to H. Ross Perot and Perot Systems Corporation.
3. The MRFF is a 501(c)(3) non-profit, civil rights organization that exists for the sole purpose of reestablishing the constitutionally guaranteed separation of church and state in the US

military. I founded the organization in 2005 after learning about the abhorrent treatment of my two Jewish sons, Curtis and Casey Weinstein, and my Christian daughter-in-law, Amanda Weinstein, by fundamentalist evangelical Christian zealots at the United States Air Force Academy. Since then, MRFF has grown to have approximately 41,000 clients from all branches of the US military, inclusive of active duty United States Sailors, Soldiers, Marines, Airmen, Cadets, Midshipmen, National Guard and reserve personnel, Coast Guard men and women, and Veterans who represent a myriad faith and non-faith groups, including but not limited to Christian, Jewish, Hindu, Sikh, Buddhist, Native American spiritualist, Agnostic, Atheist, Humanist, Secularist, and numerous other minority faith traditions. MRFF has been nominated 7 times in the last 6 years for the Nobel Peace Prize.

4. The Bladensburg Cross does not represent our tens of thousands of MRFF clients because they strongly support separation of church and state. The Bladensburg Cross is a Christian symbol on government property. It is our position that an exclusivist Christian government does not rule the United States of America. The majority of our clients (approximately 96% in fact) are members of one of the many Christian denominations, with about 3/4 being Protestants from a plethora of denominations, while the remaining 1/4 are Roman Catholic. Even our Christian clients recognize the simple truth that for them to be free, they must first guarantee the freedoms of others, and vehemently oppose Christian supremacist policies, actions, or monuments.

5. Because the Bladensburg Cross is a Christian symbol, it sends a message to all of our non-Christian MRFF clients that they are outsiders and unwelcome in the Town of Bladensburg. This message is particularly harmful in the context of a war memorial. It sends a clear signal to all our non-Christian veterans that they are not worthy of being remembered. It sends a clear signal to all the mothers and fathers of non-Christian service members that their sons and daughters are less important

than those Christian service members.

6. As the leader of an organization of multiple thousands of active duty and veteran warriors – and a veteran myself – I can say with authority that the Bladensburg Cross is not a neutral memorial that represents our nation’s heroes. Rather, it is a clear relic of the foul, sectarian, and anti-constitutional plague of Christian supremacy, which has wreaked havoc on our country’s secular character for the greater part of the last century.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this day of April ____, 2015.

Michael L. Weinstein