

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FREEDOM FROM RELIGION FOUNDATION,
INC., DAN BARKER, ANNIE LAURIE
GAYLOR, AND DAVID WILLIAMSON,

Case No. 6:13-cv-00922

Plaintiffs

v.

ORANGE COUNTY SCHOOL BOARD,

Defendant

_____ /

DECLARATION OF PLAINTIFF DAVID WILLIAMSON
IN SUPPORT OF PLAINTIFFS'
MOTION FOR SUMMARY JUDGMENT

I, David Williamson, Plaintiff in the above-captioned matter, declare and state as follows:

1. I am over the age of eighteen. I have personal knowledge of, and am competent to testify to, the matters herein.
2. I am a member of the Freedom From Religion Foundation (FFRF) and organizer of the Central Florida Freethought Community (CFFC), which is a local chapter of FFRF.
3. I organized the distribution of freethought literature in high schools in Orange County Public Schools on behalf of FFRF and CFFC, which took place on May 2, 2013.

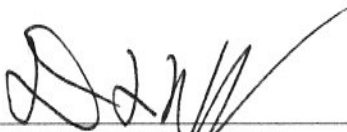
4. Orange County Public Schools prohibited me from distributing some materials that I

reasons Orange County was prohibiting some materials. These letter are labeled as Exhibit A & B to Plaintiffs' Complaint.

5. I have personal knowledge that the photographs attached to Plaintiffs' Complaint labeled as exhibits M.a, M.b, N.a, N.b, O, and P are authentic, true, and correct.
6. I have personal knowledge that the texts of the "nontracts" attached to Plaintiffs' Complaint and labeled as exhibits G, H, I, and J are authentic, true, and correct.
7. To my knowledge, Defendants have done nothing to change its vetting or approval process for literature to be distributed in the future.
8. To my knowledge, Defendants have instituted no new procedures regarding literature distributions.
9. To my knowledge, Defendants have not amended any policies or procedures regarding literature distributions.
10. To my knowledge, Defendants have no policy or procedure regarding literature distributions save that Plaintiffs' distributions must be passive.
11. To my knowledge, Defendants intend to put all Plaintiffs' future literature distributions through the same approval process, managed by the same personnel as resulted in the previous censorship of Plaintiffs' literature.
12. Plaintiffs' previous distributions followed the passive distribution rules.
13. Plaintiffs' previous distributions did not cause any disruption to school operations and are aware of no plausible claim that it would in the future.

VERIFICATION PAGE

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed this
12th day of May, 2014, in Oviedo, Seminole County, Florida



DAVID WILLIAMSON

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2014, a true and correct copy of the foregoing was sent
via electronic mail to: **Howard S. Marks, Esquire**, Burr & Foreman, LLP, 200 S. Orange
Avenue, Suite 800, Orlando, Florida, 32801, hmarks@burr.com, dmmorton@burr.com,
mrannell@burr.com, Attorneys for Defendant.

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By: /s/ Steven M. Brady
STEVEN M. BRADY