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FOUNDATION, INC.
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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **EASTERN DIVISION**
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17 **FREEDOM FROM RELIGION**
FOUNDATION, INC.,

18 **Plaintiff,**

19 v.

20 **CITY OF RANCHO CUCAMONGA,**
21 **CALIFORNIA, and LINDA**
22 **DANIELS, Rancho Cucamonga**
Development Director,

23 **Defendants**
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CASE NO.: CV08-07833 PA (PJWx)

DECLARATION OF
ANNIE LAURIE GAYLOR

Hearing

Date: September 14, 2009

Time: 1:30 p.m.

Dept.: 15

Judge: Hon. Percy Anderson

DECLARATION OF ANNIE LAURIE GAYLOR

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DECLARATION OF ANNIE LAURIE GAYLOR

I, Annie Laurie Gaylor, do hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following facts set forth below are true and correct to the best of my knowledge:

1. I am a co-president of the Plaintiff, Freedom From Religion Foundation, Inc.

2. FFRF has engaged in a national campaign to raise awareness about the views of non-believers by placing thought-provoking billboard messages in communities throughout the United States.

3. In November 2008, FFRF began displaying its thought-provoking billboard message "Imagine No Religion" in Rancho Cucamonga, California.

4. FFRF contracted with a local billboard operator to display its message in Rancho Cucamonga; the local company with which FFRF contracted was General Outdoor Advertising.

5. Several days after General Outdoor Advertising began displaying the "Imagine No Religion" billboard, General Outdoor Advertising notified FFRF that the company was removing the billboard from further display.

6. FFRF quickly learned from media reports that someone from the City of Rancho Cucamonga contacted General Outdoor Advertising regarding complaints about the "Imagine No Religion" billboard and to see what could be done to get the billboard removed. I then personally talked to the reporter, Wendy Leung, who confirmed the accuracy of the quoted statements made to her by Linda Daniels.

7. FFRF has displayed its billboards in many cities throughout the United States, but this is the first known instance where a municipality contacted the billboard operator engaged by FFRF regarding complaints about the content of the billboard.

8. FFRF understands that the City of Rancho Cucamonga will also contact any billboard operator that FFRF engages to display billboards in the City regarding any future complaints.

DECLARATION OF ANNIE LAURIE GAYLOR
