

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY

ARK ENCOUNTER, LLC, et al.,
Plaintiffs,

v

BOB STEWART, individually, and in
his official capacity as Secretary of the
Kentucky Tourism, Arts and Heritage
Cabinet, et al.,
Defendants

No. 3:15-cv-00013

Declaration Of Rev. Dr. Christopher M. Caldwell

I, Christopher M. Caldwell, declare as follows:

1. I currently reside in Louisville, Kentucky.
2. I am a minister ordained in the Baptist Faith and I serve as pastor at Broadway Baptist Church.
3. I pay a variety of state taxes to support public services in Kentucky. These include state income and sales taxes.
4. I object to awarding tax benefits to Ark Encounter, LLC, Crosswater Canyon, Inc, or Answers in Genesis, Inc. under the Kentucky Tourism Development Act for the purpose of financing, building, developing, or supporting the Ark Encounter. The tax rebates sought for Ark Encounter would effectively compel me, as a Kentucky taxpayer, to subsidize a religious ministry against my will.

I declare under penalty of perjury that this information is true to the best of my knowledge.

Executed in Louisville, Kentucky, on February ²⁴ 2015.


Christopher M. Caldwell

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No. 3:15-cv-00013

Declaration Of Linda Allewalt

I, Linda Allewalt, declare as follows:

1. I currently reside in Shelbyville, Kentucky.
2. I file tax returns jointly with my husband, and I pay a variety of state taxes to support public services in Kentucky. These include state income and real estate taxes. I also pay sales tax on items I purchase in Kentucky.
3. I object to awarding tax benefits to Ark Encounter, LLC, Crosswater Canyon, Inc., or Answers in Genesis, Inc. under the Kentucky Tourism Development Act for the purpose of financing, building, developing, or supporting the Ark Encounter. The tax rebates sought for Ark Encounter would effectively compel me, as a Kentucky taxpayer, to subsidize a religious ministry against my will.

I declare under penalty of perjury that this information is true to the best of my knowledge.

Executed in Shelbyville, Kentucky, on February 24, 2015.


Linda Allewalt

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY

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Cabinet, et al ,
Defendants.

No. 3:15-cv-00013

Declaration Of Rev. Dr. Paul D. Simmons

I, Paul D. Simmons, declare as follows:

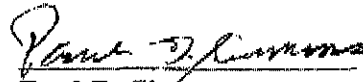
1. I presently reside in Louisville, Kentucky, where I serve as faculty at the University of Louisville.
2. I am a minister ordained in the Baptist faith. In addition to my scholarly work, I have served as pastor and interim pastor at a number of churches in Kentucky.
3. I pay a variety of state taxes to support public services in Kentucky. These include state income and sales taxes.
4. As both a minister and taxpayer, I have long opposed compelled taxpayer support of religion. To that end, I have served as a plaintiff in other lawsuits instituted to prevent misuse of public funds to support religion, including *University of Cumberlands v. Pennybacker*, 308 S.W.3d 668 (Ky 2010), and *Pedreira v. Sunrise Children's Services, Inc.*, No. 3:00-cv-210, 2014 WL 2946417 (W.D. Ky June 30,

2014) (W.D. Ky.). The latter is currently pending before the U.S. Court of Appeals for the Sixth Circuit.

5. I object to awarding tax benefits to Ark Encounter, LLC, Crosswater Canyon, Inc., or Answers in Genesis, Inc. under the Kentucky Tourism Development Act for the purpose of financing, building, developing, or supporting the Ark Encounter. The tax rebates sought for Ark Encounter would effectively compel me, as a Kentucky taxpayer, to subsidize a religious ministry against my will.

I declare under penalty of perjury that this information is true to the best of my knowledge.

Executed in Louisville, Kentucky, on February 24, 2015.


Paul D. Simmons

IN THE UNITED STATES DISTRICT COURT
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No. 3:15-cv-00013

Declaration Of Philip J. Tamplin, Jr.

I, Philip J. Tamplin Jr., declare as follows:

1. I am a small business owner and lifelong resident of the Commonwealth, presently residing in Louisville, Kentucky.
2. I pay a variety of state taxes to support public services in Kentucky. These include state income and sales taxes.
3. I object to awarding tax benefits to the Ark Encounter, LLC, Crosswater Canyon, Inc., or Answers in Genesis, Inc. under the Kentucky Tourism Development Act for the purpose of financing, building, developing, or supporting the Ark Encounter. The tax rebates sought for Ark Encounter would effectively compel me, as a Kentucky taxpayer, to subsidize a religious ministry against my will.

I declare under penalty of perjury that this information is true to the best of my knowledge.

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Executed in Louisville, Kentucky, on February __, 2015.



Philip J. Tamplin Jr.