

**individually and in her official capacity
as Eligibility Chair of the Campaign
Steering Committee of the State
Employees' Charitable Giving
Campaign; MARCIA ARMSTRONG,
DAVE PATON, ROB MAYER,
MATTHEW DALE, SHANNON
LEWIS, MARIE MATTHEWS,
KATHY MILLER, JOY MCGRATH,
GARY OWEN, TIM MCCAULEY,
BEKI GLYDE BRANDBORG, HELEN
BETTS, individually and in their official
capacities as members of the Campaign
Steering Committee of the State
Employees' Charitable Giving
Campaign,**

Defendants.

Plaintiff Montana Family Foundation (“MFF”) comes and avers the following:

INTRODUCTION

1. This case is about the fundamental right of a non-profit religious organization to be free from government discrimination. In particular, Defendants discriminate against Montana Family Foundation by wrongfully excluding it from the Montana State Employee Charitable Giving Campaign.

2. In this civil rights action, Montana Family Foundation seeks injunctive relief, declaratory relief, and damages, pursuant to 42 U.S.C. §§ 1983 and 1988, against Defendants Paula Stoll, in her official capacity as Acting

Administrator of the Department of Administration State Human Resources Division; Jack Lynch, individually and in his official capacity as Advisory Council Chairman of the Campaign Steering Committee of the State Employees' Charitable Giving Campaign; Mary Wright, individually and in her official capacity as Eligibility Chair of the Campaign Steering Committee of the State Employees' Charitable Giving Campaign; Marcia Armstrong, Dave Paton, Rob Mayer, Matthew Dale, Shannon Lewis, Marie Matthews, Kathy Miller, Joy McGrath, Gary Owen, Tim McCauley, Beki Glyde Brandborg, Helen Betts, in their official capacities as members of the Campaign Steering Committee of the State Employees' Charitable Giving Campaign.

3. This action is premised on the United States Constitution concerning the denial of Plaintiff's fundamental rights of free speech, expressive association, due process, equal protection, free exercise, and freedom from hostility toward religion.

4. Defendants' actions have deprived and will continue to deprive Plaintiff of its paramount rights and guarantees provided under the United States Constitution.

5. Each and every act of Defendants alleged herein was committed by Defendants, each and every one of them, under the color of state law.

JURISDICTION AND VENUE

6. This action raises federal questions under the United States Constitution, namely the First and Fourteenth Amendments, and under federal law, 28 U.S.C. §§ 2201 and 2202 and 42 U.S.C. §§ 1983 and 1988.

7. This Court has original jurisdiction over the federal claims by operation of 28 U.S.C. §§ 1331 and 1343.

8. This Court has authority to grant the requested injunctive relief under 28 U.S.C. § 1343(3); the requested declaratory relief pursuant to 28 U.S.C. §§ 2201 and 2202; and Plaintiff's prayer for relief regarding costs, including reasonable attorneys' fees, under 42 U.S.C. § 1988.

9. Venue is proper in the District Court of the District of Montana, pursuant to 28 U.S.C. § 1391(b), because the claims arise in this district and the Defendants reside in this district.

PLAINTIFF

10. Montana Family Foundation ("MFF") is a 501(c)(3) non-profit, non-stock, domestic corporation in good standing with the State of Montana. MFF is incorporated in Montana. Its principal office is located in Laurel, Montana.

DEFENDANTS

11. Defendant Paula Stoll is the Acting Administrator of the Department

of Administration State Human Resources Division (“Department of Administration”). In her official capacity, she is responsible for overseeing all State of Montana human resource policies and programs, including the State Employees' Charitable Giving Campaign. Ms. Stoll is sued in her official capacity.

12. Defendant Jack Lynch is the Advisory Council Chairman of the Campaign Steering Committee of the State Employees' Charitable Giving Campaign. In his official capacity, he is responsible for overseeing and administering the State Employees' Charitable Giving Campaign, including the process for determining whether a charitable organization qualifies to participate in the State Employees' Charitable Giving Campaign. Mr. Lynch is sued in his official and individual capacity.

13. Defendant Mary Wright is the Eligibility Chair of the Campaign Steering Committee of the State Employees' Charitable Giving Campaign. In her official capacity, she is responsible for overseeing and administering the process for determining whether a charitable organization qualifies to participate in the State Employees' Charitable Giving Campaign. Ms. Wright is sued in her official and individual capacity.

14. Defendants Marcia Armstrong, Dave Paton, Rob Mayer, Matthew Dale, Shannon Lewis, Marie Matthews, Mary Wright, Kathy Miller, Joy McGrath,

Gary Owen, Tim McCauley, Beki Glyde Brandborg, and Helen Betts are members of the Campaign Steering Committee of the State Employees' Charitable Giving Campaign. In their official capacities, they participate in the decision-making process that determines whether a charitable organization qualifies to participate in the State Employees' Charitable Giving Campaign. These Campaign Steering Committee members are sued in their official capacities.

FACTS

Montana Family Foundation

15. MFF was founded in 2002 as a 501(c)(3) organization to protect and strengthen Montana families.

16. MFF adheres to the following mission statement: “The Montana Family Foundation is a non-profit, research and education organization dedicated to supporting, protecting and strengthening Montana families.”

17. MFF’s business and affairs are overseen by a volunteer Board of Directors. The Board of Directors appoints and oversees a President who manages the daily activities of MFF.

18. MFF’s current president is Jeff Laszloffy. He has been president since 2003.

19. MFF’s primary office is located in Laurel, Montana.

20. MFF adheres to the following Statement of Principles, as set out in its bylaws:

- The breakdown of the family is one of the most serious moral, social and political crises facing our state and nation.
- The family is a fundamental institution in a civil society and government should promote and protect its formation and well being.
- The family is defined as people who are related by blood, marriage or adoption and should be founded on a life-long marriage of one man and one woman, which creates the best environment in which to raise children.
- The principles, in which America's founding is rooted, support strong and stable families. As stated in the Declaration of Independence, those principles include that American government is derived from the "Laws of Nature and of Nature's God," that all people are "endowed by their Creator with certain unalienable Rights" and that government's primary responsibility is to "secure these Rights."
- Human life is sacred from conception to natural death and must be protected by government.
- An informed and politically active citizenry is the best means for shaping pro-family public policy.

21. MFF achieves its mission through influencing, persuading, and equipping.

22. MFF tries to influence by researching and proposing legislation on the issues of the day.

23. MFF tries to persuade by speaking through various media outlets about their positions on the issues of the day.

24. MFF tries to equip by educating and by encouraging the Christian church and others to interact with the culture on the issues of the day.

25. MFF adheres to the following Statement of Faith, as set out in its bylaws:

- We believe the Bible to be the inspired, the only infallible, authoritative Word of God.
- We believe that there is one God, eternally existent in three persons: Father, Son, and Holy Spirit
- We believe in the deity of our Lord Jesus Christ, in his virgin birth, in his sinless life, in His miracles, in His vicarious and atoning death through His shed blood, in His bodily resurrection, in His ascension to the right hand of the Father, and in His personal return in power and glory.
- We believe that for the salvation of lost and sinful man, regeneration by the Holy Spirit is absolutely essential, and that this salvation is received through faith in Jesus Christ as Savior and Lord and not as a result of good works.
- We believe in the present ministry of the Holy Spirit by whose indwelling the Christian is enabled to live a godly life and to perform good works.
- We believe in the resurrection of both the saved and the lost; they that are saved unto the resurrection of life and they that are lost unto the resurrection of damnation.
- We believe in the spiritual unity of believers in our Lord Jesus Christ.
- We believe that God has commanded that no intimate sexual activity be engaged in outside of a marriage between a man and a woman. We believe that any form of homosexuality, lesbianism, bisexuality, bestiality, incest, fornication, adultery, and pornography are sinful

perversions of God's gift of sex. We believe that God disapproves of and forbids any attempt to alter one's gender by surgery or appearance.

26. MFF was founded and exists to express and advance a particular societal goal regarding the family in Montana. This goal is specifically informed by MFF's religious perspective. MFF functions as a result of – and in order to express – MFF's religious beliefs and viewpoints.

27. In keeping with its mission, MFF focuses on contemporary issues that affect the family, such as abortion and marriage. MFF is a huge proponent of life and protection of the unborn. Also, MFF strongly supports the traditional view of marriage between one man and one woman.

28. The only way that MFF can achieve its goals is to solicit and obtain donations from private citizens. Without donations from citizens, MFF would cease to exist and would not be able to communicate its pro-family message. As a 501(c)(3) non-profit organization, MFF necessarily uses funds received from private donations to communicate MFF's religiously-oriented pro-family message.

Montana State Employees' Charitable Giving Campaign

29. The Montana State Employees' Charitable Giving Campaign (also referred to as "Campaign") is a state-operated program through which state employees may choose to voluntarily donate to a wide variety of non-profit groups using payroll deduction, checks, or cash.

30. The Campaign is the only authorized state-sponsored, charitable fund-raising campaign conducted by and among state employees at the worksite.

31. The funds that charitable organizations receive through the Campaign come from the voluntary contributions of employees. The funds do not come from the State of Montana.

32. State employees may choose to contribute to some, none, or all of the organizations that participate in the Campaign. Any contributions made through the Campaign are completely voluntary.

33. The Department of Administration administers the Campaign with assistance from an advisory council of volunteer state employees, a fiscal and a program contractor, and representatives of federations and independent participants.

34. To participate in the 2009 Campaign, a non-profit organization was required to submit an application by the deadline of May 15, 2009, and satisfy the following requirements:

A. Each non-profit must be, or be a program directly managed by, an organization that has tax exempt status granted by the IRS under 26 USC 501(c)(3) or has such status granted by an act of Congress.

B. Each non-profit must meet the following criteria. Each non-profit must:

1. Provide a complete Application and Agreement and non-profit Information Form signed by the executive director or board chair.
2. Submit a copy of the 501(c)(3) showing that it is, or is directly managed by, an organization in compliance with section II.A above.

3. Provide written evidence that it is registered with the Secretary of State (SOS) to do business in Montana and which shows active status. This is available at <http://app.mt.gov/bes>.
4. Show that at least 70 percent of the funds raised from the campaign are used to benefit of the people of Montana. If this is not the case, you must explain in writing to the satisfaction of the Department of Administration and the Campaign Advisory Council how there is a substantial return or benefit to the people of the state.
5. Use the funds contributed by state employees for the purposes described in campaign materials.
6. Have a written policy and procedure of nondiscrimination in regard to race, color, religion, national origin, disability, age marital status or sex for the purpose of service, employment, membership or leadership.
7. Certify that your non-profit accounts for its funds in accordance with generally accepted accounting principles.
8. Be directed by an active and responsible governing body whose members have no material conflict of interest and a majority of whom serve without compensation.
9. Conduct publicity and promotional activities based on its actual programs and operations.
10. Not have sectarian activities as the primary focus. This includes activities aimed at promoting one or more religious viewpoints. Sectarian activities that are only incidental to the primary focus will not necessarily cause disqualification.
11. Not share or sell names or addresses of state employee donors to anyone.

Denial of MFF's Application

35. Prior to the fall of 2008, MFF had no knowledge of the Montana State Employees' Charitable Giving Campaign or that MFF could possibly participate in the Campaign.

36. But in fall of 2008, Laszloffy received an email from a state employee asking whether MFF was listed as an organization participating in the Campaign.

The emailer wanted this information so that he could contribute to MFF via the Campaign.

37. This 2008 email motivated Laszloffy to research and evaluate the Montana State Employees' Charitable Giving Campaign for possible participation in the future.

38. In 2008, state employees donated more than \$503,000.00 through the Campaign. The largest gift was \$30,190.00 and the average gift was \$1,239.00.

39. Over 400 non-profit organizations participated in the Campaign in 2008. These organizations represented a wide range of social and political viewpoints, including the American Red Cross of Montana, Helena Youth Choir, The Sierra Club Foundation, the NRA Foundation, the Animal Welfare League, Montana Human Rights Network, NARAL Pro-Choice Montana Foundation, and the Blue Mountain Clinic Family Practice. The following religious organizations also participated in the 2008 Campaign: God's Love Shelter, Friendship House of Christian Service, Catholic Social Services of Montana, and St. Ignatius Mission.

40. After conducting his research, Laszloffy determined that MFF would greatly benefit from participating in the Campaign. Participation would open up a new avenue for MFF to solicit funds to support its goals. Laszloffy learned of numerous other state employees who wished to contribute to MFF through the

Campaign, and anticipated the 2009 Campaign generating contributions that MFF would not otherwise receive.

41. Accordingly, MFF decided to apply for the 2009 Campaign.

42. On May 8, 2009, MFF submitted its application to participate in the 2009 Campaign. MFF complied with all the necessary requirements to participate in the Campaign by providing all the requested information in the application, submitting an application fee, and accurately disclosing all of the requested information.

43. On May 21, 2009, MFF received a letter from Jack Lynch, the Advisory Council Chairman of the Campaign Steering Committee of the State Employees' Charitable Giving Campaign. In this letter, Mr. Lynch, on behalf of the Department of Administration, rejected MFF's application to participate in the Campaign.

44. The basis for the denial, as set out in the denial letter, reads as follows:

We regret to inform you that your application to be included in the 2009 State Employees Charitable Giving Campaign is denied.

Our eligibility requirements, Section II, B, number 3, state that an organization "not have sectarian activities as the primary focus. This includes activities aimed at promoting one or more religious viewpoints. Sectarian activities that are only incidental to the primary focus will not necessary cause disqualification."

After careful review we determined that your organization does not qualify under this requirement.

Impact of Anti-Sectarian Rule

45. The information sought and received by Department of Administration in its application process did not indicate whether MFF was an organization with a sectarian activity as primary focus, but Department of Administration determined that MFF was promoting a religious viewpoint through the “careful review” mentioned in the denial letter.

46. As a result of this letter and the determination that MFF has sectarian activity as its primary focus, MFF was unable to participate in the 2009 Campaign. Therefore, MFF lost the opportunity to seek donations from state employees in 2009.

47. MFF views participation in the Campaign an important and essential way to raise funds and to further its message and goals in Montana. Had MFF been allowed to participate in the 2009 Campaign, it would have been more effective at expressing its message and achieving its goals. There was no other effective alternative to reach state employees besides the Campaign, since the Campaign is the only authorized state-sponsored, charitable fund-raising campaign conducted by and among state employees at the worksite.

48. In this year missed, 2009, state employees donated more than \$532,000.00. The largest gift to a non-profit was \$32,473.76 and average gift was \$1,242.53.

49. The 2009 Campaign, once again, involved over 400 non-profits, including a wide variety of organizations with ideologically-driven viewpoints, such as: the Animal Welfare League (animals), Indian Law Resource Center (Native Americans), MADRE (women), the NRA Foundation (guns), The Sierra Club Foundation (environment), and Sustainable Obtainable Solutions (climate change).

50. The Department of Administration permitted a significant number of groups promoting viewpoints antithetical to those held by MFF in the 2009 Campaign, including American Civil Liberties Union of Montana Foundation (pro-abortion and pro-homosexual unions), Blue Mountain Clinic Family Practice (pro-abortion), Montana Coalition Against Sexual and Domestic Violence (pro-abortion), Montana Human Rights Network (pro-homosexual unions), NARAL Pro-Choice Montana Foundation (pro-abortion), Planned Parenthood of Montana (pro-abortion), and Working for Equality and Economic Liberation (pro-abortion).

51. The Department of Administration also permitted many religious and sectarian groups in the 2009 Campaign, including Butte Rescue Mission, Carenet of Billings, Catholic Social Services of Montana, Friendship House of Christian Service, God's Love Shelter, Good Samaritan Thrift Store, Great Falls Rescue Mission, Lutheran Social Services of Montana, Salvation Army, Samaritan House, Special K Ranch, St. Ignatius Mission, and St. Vincent de Paul.

52. On March 30, 2010, MFF obtained an application packet for the 2010 State Employees' Charitable Giving Campaign in Montana. The 2010 Campaign contains the same requirements as the 2009 Campaign, including the following anti-sectarian rule:

Not have sectarian activities as the primary focus. This includes activities aimed at promoting one or more religious viewpoints. Sectarian activities that are only incidental to the primary focus will not necessarily cause disqualification.

53. Also, to participate in 2010 Campaign, MFF would be required to sign an agreement stating that MFF “does not have sectarian activity as its primary focus.”

54. MFF desires to participate in the 2010 Campaign. The program is slated to begin in September of 2010. MFF wants to participate, but MFF cannot sign the agreement since it primarily pursues “sectarian” activity as defined by Department of Administration. MFF seeks to promote viewpoints that emanate from its religious perspective.

55. MFF is chilled and deterred from applying to participate in the 2010 Campaign, or any other future Campaign, because of the denial letter, and because of the continued enforcement of the anti-sectarian rule.

56. The presence of the anti-sectarian rule, and the condition of agreeing to abide by it, makes applying for the 2010 Campaign, and any future Campaigns, futile since MFF’s application would automatically be denied. If not for the anti-

sectarian rule, MFF would apply to participate in the 2010 Campaign and all future Campaigns.

57. The impact of deterring MFF from exercising its constitutional rights constitutes irreparable harm to MFF. The deterring effect also causes MFF to lose funds and resources that MFF would use to communicate its message.

58. The Campaign curbs MFF's viewpoint and message by keeping it out of the Campaign. Moreover, the Campaign further dilutes MFF's message by allowing for the participation of various groups with polar-opposite viewpoints.

59. MFF does not have an adequate remedy at law for the loss of their constitutional rights.

60. For these reasons, MFF challenges the anti-sectarian rule that restricts access to Montana's State Employees' Charitable Giving Campaign, on its face and as applied. MFF challenges this provision both on its face and as applied and on behalf of third party speakers not before the Court.

FIRST CAUSE OF ACTION

Violation of Freedom of Speech

61. MFF's religious speech is protected speech under the First Amendment.

62. Defendants' written policies and practices, including, but not limited to, the anti-sectarian rule excluding sectarian groups from the Montana State

Employee Charitable Giving Campaign, and Defendants' enforcement thereof:

- a. are vague and overbroad;
- b. single out religious speech for discriminatory treatment in favor of non-religious speech;
- c. single out some religious speech for discriminatory treatment in favor of other religious speech;
- d. discriminate against speech because of its content;
- e. discriminate against speech on the basis of the speaker's viewpoint;
- f. restrain constitutionally-protected speech in advance of its expression, with virtually no guidelines or standards to guide the discretion of officials charged with enforcing the policy;
- g. chill the free speech and free exercise of religion of MFF and of other citizens and organizations wishing to participate in the Campaign;
- h. allow the exercise of unbridled discretion;
- i. lack narrow tailoring, fail to achieve any legitimate government purpose, and fail to leave open alternative avenues for expression; and
- j. allows the government to condition a discretionary benefit on a viewpoint-discriminatory basis.

63. Defendants have no compelling or legitimate reason justifying their censorship of religious viewpoints sought to be expressed by MFF.

64. Defendants' policies, and the enforcement thereof, thus violate the Free Speech Clause of the First Amendment to the United States Constitution, made applicable to the states through the Fourteenth Amendment.

WHEREFORE, MFF respectfully prays the Court grant the equitable and legal relief set forth in the prayer for relief.

SECOND CAUSE OF ACTION

Violation of Expressive Association

65. The First Amendment protects the rights of groups to associate for the purpose of engaging in the expressive activities protected by the First Amendment.

66. MFF is a group that associates and assembles in order to express particular religious, political, and social messages and viewpoints.

67. Defendants' policy and practices of singling out and excluding sectarian religious groups from the Montana State Employee Charitable Giving Campaign prevents Plaintiff from seeking donations and thereby effectively prevents Plaintiff from associating in such a way to achieve its mission and goals.

68. Defendants' policy and practices of singling out and excluding sectarian religious groups from the Montana State Employee Charitable Giving Campaign also discourages MFF from associating for sectarian purposes.

69. No legitimate state interest exists to justify this limitation of MFF's right to free association.

THIRD CAUSE OF ACTION

Violation of the Free Exercise Clause

70. MFF adheres to and maintains religious beliefs that are central to its mission and purpose.

71. The Free Exercise Clause requires the government to remain neutral with respect to different religious viewpoints and to avoid unequal treatment of different religions.

72. Defendants' policies and their enforcement thereof specifically and substantially burden MFF's religious expression by preventing MFF from accessing the Montana State Employee Charitable Giving Campaign and thereby prevent MFF from raising funds to express their religious beliefs.

73. Defendants have no compelling or legitimate reason justifying the infringement on MFF's religious beliefs.

74. Defendants' policies and their enforcement thereof therefore violate the Free Exercise Clause of the First Amendment to the United States Constitution, made applicable to the states under the Fourteenth Amendment.

WHEREFORE, MFF respectfully prays the Court grant the equitable and legal relief set forth in the prayer for relief.

FOURTH CAUSE OF ACTION

Violation of the Equal Protection Clause

75. Under their policies, Defendants have allowed other citizens and organizations to access the Montana State Employee Charitable Giving Campaign, but prevent MFF from accessing the Campaign solely because of MFF's particular religious beliefs.

76. Defendants' enforcement of its policies intentionally treats MFF differently than other similarly-situated organizations based on the viewpoint of their expression.

77. The state actually promotes the opposing viewpoint by allowing organizations that promote polar-opposite viewpoints to participate in the Campaign, while disallowing MFF.

78. Defendants have no compelling or legitimate reason justifying their disparate treatment of MFF.

79. The policies, and Defendants' enforcement thereof, therefore violate the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution.

WHEREFORE, MFF respectfully prays the Court grant the equitable and legal relief set forth in the prayer for relief.

FIFTH CAUSE OF ACTION

Violation of the Due Process Clause

80. Defendants' policies are vague and lack sufficient objective standards to curtail the discretion of officials. This unbridled discretion and vagueness permits Defendants to enforce the policies in an *ad hoc* and discriminatory manner and prevents MFF from learning how to comply with government requirements.

81. Defendants have no compelling or legitimate reason justifying their vague policies.

82. The policies, and Defendants' enforcement thereof, therefore violate the Due Process Clause of the Fourteenth Amendment to the United States Constitution.

WHEREFORE, MFF respectfully prays the Court grant the equitable and legal relief set forth hereinafter in the prayer for relief.

SIXTH CAUSE OF ACTION

Violation of Establishment Clause

83. The Establishment Clause, as set out in the First Amendment to the United States Constitution, incorporated and made applicable to the states by the Fourteenth Amendment, prohibits hostility toward religion.

84. The Establishment Clause also prohibits the government from favoring one religious denomination or religious viewpoint over another.

85. Defendants' policy and practices of singling out and excluding sectarian religious groups from the Montana State Employee Charitable Giving Campaign are not neutral toward religion, but are invidious, and reflect open hostility toward religion, specifically demonstrating hostility toward MFF's faith and beliefs.

86. No legitimate state interest exists justifying the hostility toward MFF's religion.

87. Defendants' policy and practices, and enforcement thereof, excessively entangles Defendants and government with religion by requiring officials to investigate, monitor, and determine whether a particular religious group is primarily sectarian or not.

88. Defendants' policy and practices act to violate MFF's fundamental right to avoid governmental hostility toward their religion and to be free from excessive governmental entanglement with religion.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff MFF respectfully requests the following relief:

A. That this Court issue Preliminary and Permanent Injunctions enjoining Defendants, Defendants' agents, employees, and all persons in active concert or participation with them from applying their written policy or any other policy or practice, including the anti-sectarian rule, so as to exclude primarily sectarian

organizations, and those groups expressing religious viewpoints, from participating in the Montana State Employees' Charitable Giving Campaign. MFF specifically seeks a preliminary and permanent injunction allowing it to participate in the 2010 Campaign.

B. That this Court render a Declaratory Judgment declaring that Defendants' written policy and practice, including the anti-sectarian rule, prohibiting primarily sectarian organizations, and those groups promoting religious viewpoints, from participating in Montana State Employee Charitable Giving Campaign violates the First and Fourteenth Amendments to the United States Constitution;

C. That this Court render a Declaratory Judgment declaring that Defendants' decision, pursuant to its written policy and practice, prohibiting MFF from participating in the 2009 Montana State Employee Charitable Giving Campaign, violated MFF's rights under the First and Fourteenth Amendments to the United States Constitution;

D. Adjudge, decree, and declare the rights and other legal relations with the subject matter here in controversy, in order that such declaration shall have the force and effect of final judgment;

E. That this Court award MFF nominal damages for the violation of its rights caused by Defendants' policies and practices that prohibited MFF from


participating in the 2009 Montana State Employee Charitable Giving Campaign;

F. That this Court award MFF their costs and expenses of this action, including reasonable attorneys' fees, in accordance with 42 U.S.C. § 1988 and other applicable law; and

G. That this Court grant such other and further relief as this Court deems equitable and just.

VERIFICATION OF COMPLAINT

I, Jeff Laszloffy, President/CEO of Montana Family Foundation, a citizen of the United States and a resident of Laurel, Montana, hereby declare that I have read the foregoing Verified Complaint and the factual allegations therein, and the facts as alleged therein are true and correct.



JEFF LASZLOFFY
President/CEO of Montana Family Foundation

Respectfully submitted,

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*Motion for Admission *Pro Hac Vic* filed concurrently.