

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

FREEDOM FROM RELIGION
FOUNDATION, INC.; ANNIE
NICOL GAYLOR; ANNIE LAURIE
GAYLOR; PAUL GAYLOR; DAN
BARKER; PHYLLIS ROSE, and
JILL DEAN,

Plaintiffs,

vs.

CASE NO.: 08-CV-588

PRESIDENT BARACK OBAMA;
WHITE HOUSE PRESS SECRETARY
ROBERT GIBBS; WISCONSIN
GOVERNOR JIM DOYLE, and
SHIRLEY DOBSON, CHAIRMAN OF
THE NATIONAL DAY OF PRAYER
TASK FORCE,

Defendants.

DEPOSITION OF SHIRLEY DOBSON

November 10, 2009

PURSUANT TO NOTICE, the deposition of SHIRLEY DOBSON was taken on behalf of the Plaintiffs, pursuant to Federal Rules of Civil Procedure, at 8605 Explorer Drive, Colorado Springs, Colorado, this date at 8:36 a.m., before Connie S. Dyke, RPR, CRR, and Notary Public.

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1 SHIRLEY DOBSON,
 2 called as a witness, having been first duly sworn,
 3 testified as follows:
 4 EXAMINATION
 5 BY MR. BOLTON:
 6 Q. Mrs. Dobson, you're currently the chairman or
 7 cochairman of the National Day of Prayer Task Force; is
 8 that correct?
 9 A. Chairman.
 10 Q. And you've held that position since 1991?
 11 A. Correct.
 12 Q. For convenience, when I refer to the "National
 13 Day of Prayer Task Force" throughout the deposition, I
 14 think I'm probably going to just try to refer to it as
 15 the task force for shorthand. Is that okay?
 16 A. (Witness indicating in the affirmative.)
 17 Q. Would it be fair to describe one of the goals
 18 of the task force is to encourage prayer?
 19 A. Yes.
 20 MR. THERIOT: Shirley, I should interject
 21 here. We didn't talk about this, but nodding your head
 22 doesn't work because she can't -- she does actually
 23 take that down, but it's better if you give a verbal
 24 answer.
 25 THE WITNESS: Okay.

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1 Q. (BY MR. BOLTON) Has that always been one of
 2 the goals of the task force?
 3 A. Yes.
 4 Q. Were you involved in the establishment or the
 5 setting up of the task force?
 6 A. No.
 7 Q. Who was involved in the original formation of
 8 the task force?
 9 A. It would be the National Prayer Committee with
 10 my approval.
 11 Q. Say the name again.
 12 A. The National Prayer Committee with my
 13 approval.
 14 Q. With your approval, okay. And the task force
 15 was set up in 1988; is that correct?
 16 A. That's correct.
 17 Q. And when you say that it was set up by "the
 18 National Prayer Committee with your approval," what do
 19 you mean, first of all, by the description "with your
 20 approval"? What was your role in having approval?
 21 A. Well, I would interview the candidates for the
 22 task force and approve them.
 23 Q. Had the task force been created as an entity
 24 of that name at the time that you gave this approval to
 25 the people that you interviewed?

1 A. I took over in 1991, and there was a task
 2 force then, and it has grown under my leadership.
 3 Q. Did you have any role in the task force prior
 4 to 1991?
 5 A. No.
 6 Q. Did Mr. Dobson have any role in the task force
 7 prior to 1991?
 8 A. Not at all.
 9 Q. Did Mr. Dobson have any role with the National
 10 Prayer Committee?
 11 A. No.
 12 Q. Do you know how it came about that the prayer
 13 committee undertook to set up the task force?
 14 A. No, I don't know.
 15 Q. Do you know anything about the history of the
 16 task force prior to you becoming the chairman in
 17 1991?
 18 A. Not really.
 19 Q. When the task force was originally
 20 established, do you know where it was located?
 21 A. Yes.
 22 Q. Where was that?
 23 A. In San Bernardino, California, under the
 24 direction of Mrs. Vonette Bright.
 25 Q. And when did it move to Colorado Springs?

1 Q. How much?
 2 A. First year, \$100,000; second year, \$50,000;
 3 third year, \$25,000, and then I was on the -- the task
 4 force was on their own.
 5 Q. Has Focus on the Family continued since then
 6 to make a decision to provide funding --
 7 A. No.
 8 Q. -- to the task force?
 9 A. We're totally on our own.
 10 MR. THERIOT: One more thing. We didn't talk
 11 about this either, but you should wait until he
 12 finishes asking his question so you know exactly what
 13 he's asking before you answer.
 14 Q. (BY MR. BOLTON) When you took over as chairman
 15 of the task force in 1991, I assume that you were
 16 previously familiar with the task force; is that
 17 correct?
 18 A. Yes.
 19 Q. And when did you become aware of the task
 20 force?
 21 A. I would say 1988.
 22 Q. And how did you become aware?
 23 A. Mrs. Bright asked me if I would be her
 24 cochairman.
 25 Q. And what did you say?

1 A. When I accepted the chairmanship.
 2 Q. And it has been here ever since; is that
 3 correct?
 4 A. Correct.
 5 Q. And it's located on the campus of Focus on the
 6 Family; is that correct?
 7 A. That's correct.
 8 Q. When the task force was originally
 9 established, did Focus on the Family provide any of the
 10 start-up money for the task force?
 11 A. The board did.
 12 Q. Pardon me?
 13 A. The Focus on the Family board did.
 14 Q. You said the Focus on the Family board?
 15 A. Yes.
 16 Q. Meaning individual members of the Focus on the
 17 Family board?
 18 A. No. The whole board voted that when I took
 19 over the chairmanship, that they would give me seed
 20 money to get me started, which is not unusual. They
 21 give seed money to several ministries to get them off
 22 the ground.
 23 Q. And do you know how much seed money was
 24 given?
 25 A. Yes.

1 A. I said I would pray about it and talk to my
 2 husband and get back to her.
 3 Q. And did you?
 4 A. Yes.
 5 Q. And what was your response?
 6 A. I accepted it.
 7 Q. Okay. And that was in 1991?
 8 A. No. When I became her cochairman was in
 9 1989.
 10 Q. I'm sorry. So you became the chairman in
 11 1991, but you were a cochair beginning in 1989?
 12 A. That's correct.
 13 Q. And at that point, the task force had already
 14 been established as an entity; is that correct?
 15 A. Small task force.
 16 Q. And prior to becoming the cochair in 1989,
 17 what did you learn about the origin and purposes for
 18 the task force?
 19 MR. ROSENBERG: Object as to form.
 20 Q. (BY MR. BOLTON) Let me rephrase the question.
 21 Had you learned anything about the history of the task
 22 force and how it came about prior to becoming the
 23 cochair in 1989?
 24 A. No.
 25 Q. You knew nothing about it?

1 A. Not before I became cochair.
 2 Q. When Mrs. Bright asked you in 1988 if you
 3 would be a cochair, did she tell you anything about the
 4 task force?
 5 A. Not really about the task force. We talked
 6 about the need for prayer in our country.
 7 Q. And did you have any understanding that the
 8 task force was to play a role in encouraging prayer in
 9 our nation?
 10 A. Yes.
 11 Q. And what did you understand at least the
 12 original intended role was?
 13 A. To help promote and publicize prayer in our
 14 nation on the National Day of Prayer.
 15 Q. Now, obviously you consider prayer to be
 16 important not just on the National Day of Prayer,
 17 correct?
 18 A. Correct.
 19 Q. The task force, as you understood it, was to
 20 promote and encourage the role of prayer mobilizing
 21 around the National Day of Prayer?
 22 A. Correct.
 23 Q. What is your understanding as to why prayer is
 24 important?
 25 A. Well, we base it on the scripture which says

1 that, "Blessed is the nation whose God is the Lord,"
 2 and prayer is powerful. It moves the heart and the
 3 hand of God. It brings blessing and protection on the
 4 nation.
 5 Q. Do you understand the United States to be a
 6 Christian nation?
 7 A. It was founded on the Judeo-Christian system
 8 of values.
 9 Q. And are those values incorporated into our
 10 government then?
 11 A. I don't know.
 12 Q. Do you believe that there is a role for our
 13 public officials to promote and encourage prayer?
 14 A. I have no idea how they feel about it.
 15 Q. Do you believe that that is an appropriate
 16 role for public officials?
 17 A. No, I think it's optional. It's up to them.
 18 Q. When you talk about the role of prayer in our
 19 nation, is it a particular type of prayer that you
 20 believe is important?
 21 A. This country was founded -- it was birthed in
 22 prayer and founded on the God of the Bible, on His
 23 biblical principles and His moral values and the
 24 Judeo-Christian system of values. So our particular
 25 task force is the expression -- the Judeo-Christian

1 expression of the National Day of Prayer. Other faiths
 2 may have their own expression. This is how we
 3 celebrate the National Day of Prayer.
 4 Q. And that would be the position of the task
 5 force, not just your personal position, correct?
 6 A. That's right.
 7 Q. And when you say "birthed in prayer" in regard
 8 to the origin of our nation, what do you mean by
 9 that?
 10 A. Well, our founding fathers that came over here
 11 and the people that came over here from England, if you
 12 look in the history, there was much prayer before they
 13 came. And when they came and landed safely, the first
 14 thing they did was pray.
 15 Q. And it was Christian prayer?
 16 A. I don't know what kind of prayer it was.
 17 Q. When you say that the role of prayer in our
 18 country needs to be -- and I'll talk about back in the
 19 formative years of 1989 for the task force -- that the
 20 role of prayer in our nation needed to be promoted and
 21 encouraged; is that fair?
 22 A. In 1952, under President Truman, he signed a
 23 resolution with both houses of Congress, signed into
 24 law, that we would have a National Day of Prayer. And
 25 then in 1988, under President Ronald Reagan, he signed

1 into law that the first Thursday would be our National
 2 Day of Prayer. So we are celebrating the National Day
 3 of Prayer, that's what our event is on that day, and
 4 then we encourage prayer throughout the year.
 5 Q. And what do you understand is the value of
 6 prayer in terms of our nation?
 7 A. Prayer, I believe, is putting a protective
 8 covering over our nation.
 9 Q. A protective what?
 10 A. Covering over our nation. In Psalms, it says,
 11 "The shields of the earth belong to the Lord." So it
 12 is God that protects us and blesses us, and we believe
 13 that prayer plays a large part in that.
 14 Q. Now, in regard to the National Day of Prayer
 15 itself, do you have any understanding that it is
 16 intended to promote any particular viewpoint or type of
 17 prayer?
 18 MR. THERIOT: Objection, calls for
 19 speculation. You may answer.
 20 MR. ROSENBERG: Objection as to form.
 21 Q. (BY MR. BOLTON) You can answer that.
 22 A. Can you restate it?
 23 Q. The National Day of Prayer itself, not the
 24 task force, do you have any understanding that the
 25 designated day is intended to promote any particular

1 form of prayer?
 2 A. No. Congress set aside this day for the
 3 American people of all faiths, and all faiths are
 4 encouraged to pray in their own tradition.
 5 Q. Your particular organization, the task force,
 6 though, is encouraging prayer based on the
 7 Christian-Judeo precepts; is that correct?
 8 A. We are the expression of the
 9 Judeo-Christian -- I mean, we are the Judeo-Christian
 10 expression of the National Day of Prayer.
 11 Q. Is it fair to say that the task force's
 12 position is that not all prayer, from the perspective
 13 of the task force, is fungible or interchangeable? The
 14 prayer that you're promoting, you're promoting as an
 15 alternative or in preference to other types of prayer
 16 for other religions; is that correct?
 17 MR. THERIOT: Objection as to form, vague.
 18 MR. ROSENBERG: Objection.
 19 Q. (BY MR. BOLTON) Do you consider prayer to be
 20 fungible? Do you understand what I mean by that?
 21 A. No.
 22 Q. Is all prayer the same?
 23 A. God has to be the judge of that.
 24 Q. Do you believe that all prayer is the same?
 25 A. Well, as I said, our expression is the

1 Q. Just the title itself, though, if I don't go
 2 to your Website and just hear National Day of Prayer
 3 Task Force, there's nothing that would alert me to the
 4 Christian-Judeo orientation of the organization,
 5 correct?
 6 A. I don't know how a person would see that.
 7 Q. With regard to the phrase "task force," do you
 8 have any understanding of how that -- well, let me ask
 9 more broadly. Do you know how the naming of the
 10 organization, National Day of Prayer Task Force, came
 11 about?
 12 MR. THERIOT: Objection, asked and answered.
 13 You can answer.
 14 A. Probably through the National Prayer
 15 Committee.
 16 Q. (BY MR. BOLTON) More specifically, though, do
 17 you know how the particular words to name the entity
 18 were selected?
 19 A. Well, the employees that worked for National
 20 Day of Prayer, you wouldn't call it National Day of
 21 Prayer employees, so you call it a task force.
 22 Q. And what is your understanding of what a task
 23 force is?
 24 A. We promote and publicize and provide resources
 25 to constituents to help them celebrate the National Day

1 Judeo-Christian, so we pray to the God of the Bible.
 2 Q. And based on your beliefs, that is the correct
 3 God that you believe in and the God that should be
 4 prayed to; is that correct?
 5 A. That's my belief.
 6 Q. With regard to the National Day of Prayer Task
 7 Force, were you at all involved in the naming of the
 8 organization?
 9 A. No.
 10 Q. Certainly there's nothing in the name of the
 11 entity itself, National Day of Prayer Task Force, that
 12 would indicate the organization's expression of the
 13 Christian-Judeo point of view; is that correct?
 14 MR. THERIOT: Objection, calls for
 15 speculation. You may answer.
 16 A. Can you restate the question?
 17 Q. (BY MR. BOLTON) Is there anything in the
 18 National Day of Prayer Task Force, in the name of the
 19 entity, that would indicate the Christian-Judeo
 20 perspective that the task force holds?
 21 A. On our Website.
 22 Q. Pardon me?
 23 A. I think it does on our Website, that we are
 24 the Judeo-Christian expression of the National Day of
 25 Prayer.

1 of Prayer if they ask for it, if they call and ask for
 2 resources.
 3 Q. Is that how you would describe then the task
 4 that is being described in the title?
 5 A. Well, the task force has many tasks. That is
 6 just a few of them.
 7 Q. What are the other tasks of the task force?
 8 A. We have state coordinators and regional
 9 coordinators, and they help them set up their events,
 10 if they need help, if they need promotional
 11 materials.
 12 Q. Now, obviously, the promotion, encouragement
 13 of prayer, could be done year-round, correct?
 14 A. Correct.
 15 Q. And it can be done without reference to a
 16 particular day designated by the President; is that
 17 correct?
 18 A. That's correct.
 19 Q. Is it advantageous to the task force to have
 20 the connection to the designated day of prayer in terms
 21 of promoting and encouraging prayer?
 22 MR. THERIOT: Objection, vague. You may
 23 answer, if you can.
 24 A. Can you restate the question?
 25 Q. (BY MR. BOLTON) Does the connection to the

1 National Day of Prayer provide any benefits to the task
 2 force in promoting and encouraging prayer?
 3 A. We believe that prayer should be 365 days a
 4 year, but the National Day of Prayer has been set aside
 5 by Congress, and we believe that on this day we should
 6 gather as to however anybody wants to gather, and that
 7 we should celebrate the National Day of Prayer. We
 8 encourage all Americans to pray according to their
 9 faith. Muslims could have a National Day of Prayer
 10 Task Force, the Hindus can have a National Day of
 11 Prayer Task Force, and the Christians can have a
 12 National Day of Prayer Task Force. That's what our
 13 expression is.
 14 Q. And is that expression that the task force --
 15 A. Judeo-Christian expression, yes.
 16 Q. And these other religions you talked about,
 17 those are not promoted by the task force?
 18 A. We are a privately funded 501(c)(3). Our
 19 volunteers and constituents are of that persuasion, and
 20 so we -- that's our expression of the National Day of
 21 Prayer, but we don't exclude any other faith from
 22 joining us.
 23 Q. Does the government support for the National
 24 Day of Prayer, is it helpful to the task force in terms
 25 of adding prestige to your effort?

1 MR. ROSENBERG: Objection, referring to what
 2 the government support is, if there's any at all.
 3 A. There's not any government support other than
 4 participation, if they choose to participate.
 5 Q. (BY MR. BOLTON) Do you believe that government
 6 participation in National Day of Prayer activities
 7 facilitates the task force in its endeavors?
 8 A. The scriptures say, in 1 Timothy 2, that we're
 9 to pray for all kings and all those in authority, that
 10 we may lead a peaceful and quiet and godly life. So,
 11 yes, I think it's beneficial if members of government
 12 participate, but that is totally up to them.
 13 Q. And it adds a certain element of credibility
 14 to the endeavors of the task force, correct?
 15 MR. THERIOT: Objection, calls for
 16 speculation.
 17 MR. ROSENBERG: And as to form.
 18 A. I don't know.
 19 Q. (BY MR. BOLTON) But you have said that you
 20 believe it adds credibility, correct?
 21 A. I didn't say that.
 22 Q. I'm asking a question. Do you believe it adds
 23 credibility to the task force?
 24 A. I don't know.
 25 Q. Do you believe it adds prestige to the task

1 force?
 2 MR. THERIOT: Objection, calls for
 3 speculation.
 4 MR. ROSENBERG: And same objection. I don't
 5 know what "it" is.
 6 Q. (BY MR. BOLTON) Can you answer the question?
 7 A. I don't know.
 8 MR. THERIOT: You don't know the answer to the
 9 question, or you can't answer the question? I'm
 10 sorry.
 11 MR. BOLTON: I had the same question in my
 12 mind.
 13 MR. THERIOT: You don't know the answer to the
 14 question, is that what you're saying?
 15 A. I don't know how that's seen.
 16 Q. (BY MR. BOLTON) Certainly the task force
 17 encourages the participation of government officials in
 18 National Day of Prayer activities, correct?
 19 A. We have an initiative that we pray for the
 20 seven centers of power, and that is the government, the
 21 military, the media, business, education, family and
 22 church. And so on the National Day of Prayer, we pray
 23 for all of those centers of power, and government is
 24 one of them.
 25 Q. In addition to praying for government, though,

1 do you encourage participation of government officials
 2 in the various activities that you organize?
 3 A. We hope they'll participate.
 4 Q. But you do more than just leave it to hope,
 5 correct?
 6 A. We write them requesting a proclamation for
 7 the National Day of Prayer, but there's no demand put
 8 on them.
 9 Q. Whether there's a demand or not, though, you
 10 certainly seek out participation by the President and
 11 by governors to issue proclamations, correct?
 12 MR. THERIOT: Objection, vague as to the
 13 meaning of "participation." You may answer it.
 14 THE WITNESS: Can I say something off the
 15 record? Is that allowable?
 16 MR. THERIOT: No. When we take a break, we
 17 can talk.
 18 A. Do you want to restate the question?
 19 Q. (BY MR. BOLTON) There are no secrets on the
 20 record.
 21 A. No. I was going to ask everybody the
 22 question. Do you want to restate that question,
 23 please?
 24 MR. BOLTON: Can you read the question back?
 25 (The requested question was read back by the

1 reporter.)
 2 A. I would say yes.
 3 Q. (BY MR. BOLTON) And the task force also at
 4 least attempts to get additional participation by
 5 government officials in the activities that the task
 6 force organizes; is that correct?
 7 A. We hope that they will participate. This day
 8 is set aside to pray for America and its leaders, and
 9 since government is in the role of leadership, we hope
 10 they will participate. It sets a good example for the
 11 nation.
 12 Q. And do you just sit back and see if it
 13 happens, or does the task force actually undertake to
 14 obtain such participation from government officials?
 15 A. We write a letter requesting a proclamation,
 16 and then there's one follow-up visit from the state
 17 coordinator of that governor to the office to see if he
 18 is going to write a proclamation. Some do and some
 19 don't.
 20 Q. Recently all the governors have been issuing
 21 proclamations; is that correct?
 22 A. Yes. That's wonderful.
 23 Q. And was that the case before you became the
 24 chairman of the task force?
 25 A. No. Under my leadership -- and I take no

1 credit for this. God has really blessed the efforts of
 2 the National Day of Prayer, so I think more people know
 3 about it. I think in the times that we're living, we
 4 see a great need for prayer, and I think our leaders
 5 see that also.
 6 Q. Do you believe the task force has been
 7 influential in this growth in government officials'
 8 participation in National Day of Prayer activities?
 9 MR. ROSENBERG: Objection.
 10 A. I don't see how, because we just write a
 11 letter requesting a proclamation.
 12 Q. (BY MR. BOLTON) It must be a really good
 13 letter. Who writes the letter?
 14 A. I have help. We have an organization here
 15 called Master Writers, and I work with them in crafting
 16 the letter.
 17 Q. And you work with them directly?
 18 A. Yes.
 19 Q. And the letters that you're talking about, are
 20 they letters that are signed by yourself?
 21 A. Yes.
 22 Q. And then the state coordinators then follow up
 23 with government officials trying to encourage
 24 participation; is that correct?
 25 A. One follow-up.

1 MR. ROSENBERG: Objection again.
 2 Q. (BY MR. BOLTON) One follow-up with the
 3 governor, correct?
 4 A. Well, they usually don't get to see the
 5 governor. They see his scheduler or his aide or
 6 whatever you call it, but they don't -- I don't know of
 7 anybody that's gotten -- well, maybe some have, but I
 8 can't give a name of anybody that sat down with the
 9 governor and said, Would you write a proclamation?
 10 It's like the President. You don't get that far.
 11 Q. Now, the letter that you prepare with Master
 12 Writers, do you send that letter also to local
 13 government officials?
 14 A. No.
 15 Q. Is there any effort by the task force to
 16 involve local government officials in National Day of
 17 Prayer activities?
 18 A. All of our workers are volunteers,
 19 coordinators are volunteers. They're not paid. We
 20 have state coordinators that are volunteers, and we
 21 have regional coordinators that are volunteers. So
 22 some of the regional volunteers may ask the mayor or
 23 the city council members or school board members if
 24 they would like to participate in the National Day of
 25 Prayer, but I have nothing to do with that.

1 Q. But they do it under the auspices of the task
 2 force though, correct?
 3 MR. THERIOT: Objection, calls for
 4 speculation.
 5 A. I don't know.
 6 Q. (BY MR. BOLTON) You've got state coordinators
 7 and then regional coordinators?
 8 A. Yes.
 9 Q. A regional coordinator, is that a broader
 10 geographic scope than a state, or is it regional within
 11 the states?
 12 A. It's regional within the states. Usually
 13 communities, cities.
 14 Q. When you began as the cochair in 1989, how
 15 many employees were there of the task force?
 16 A. Well, Campus Crusade for Christ is a ministry
 17 of Dr. Bill and Vonette Bright, so they used a lot of
 18 their staff, I'm sure, to help -- as part of the task
 19 force to help promote the National Day of Prayer. So I
 20 don't really know how many.
 21 Q. The task force does at the present time have
 22 full-time employees, correct?
 23 A. That's correct.
 24 Q. Do you know about how many full-time employees
 25 the task force has at this time?

1 A. I think we have about ten.
 2 Q. And they are full-time?
 3 A. I think we have one part-time.
 4 Q. And then in 2009, you would have had one state
 5 coordinator for each state, correct?
 6 A. I'm not sure, because they kind of come and
 7 go. So we have somebody that's over the state
 8 coordinators, and she would be able to tell you that.
 9 Q. Do you know how many volunteers altogether,
 10 approximate number of volunteers, you had acting on
 11 behalf of the task force in respect to the 2009

12 National Day of Prayer?
 13 A. We have no idea how many people are actually
 14 planning an event on the National Day of Prayer. For
 15 instance, I know of a lady that invited six of her
 16 friends to get in her van on the National Day of Prayer
 17 and they went to the police department, fire
 18 department, the school board, the mayor's office, and
 19 at each place they stopped and prayed for them. So
 20 those kind of things are generally not reported, but I
 21 would say probably we have between 30- to 40,000 prayer
 22 gatherings across the nation. And as I said, many of
 23 them -- many churches don't report that they've
 24 celebrated the National Day of Prayer. We have no
 25 idea.

1 Q. Are the state coordinators encouraged to
 2 organize activities in the state capitols in which they
 3 operate?
 4 A. That's up to them.
 5 Q. Are they encouraged to organize activities in
 6 the state capitols?
 7 A. If there are other events on the state capitol
 8 steps, some choose to have their event there. Some
 9 choose to have them in the state parks, churches,
 10 homes.
 11 Q. A statehouse, is that a preferred location for
 12 activities, if it can be done?
 13 A. Some feel like -- some coordinators may feel
 14 like it is and some may feel like it's not.
 15 Q. In 2009, do you know how many National Day of
 16 Prayer activities occurred at statehouses?
 17 A. I have no idea.
 18 Q. Well, you do know, in addition to presidential
 19 and gubernatorial proclamations, that some local
 20 officials now also issue proclamations, correct?
 21 A. I've heard that.
 22 Q. Who did you hear that from?
 23 A. It's just been rumored. I mean, I've heard
 24 that some mayors do. I couldn't give you a name. They
 25 typically don't send the proclamation to us. We never

1 see them.
 2 Q. But you do know as a fact, though, that there
 3 are additional proclamations issued at lower government
 4 levels than just the president and the governor levels,
 5 correct?
 6 A. I really don't know.
 7 Q. With regard to the proclamations issued by the
 8 governors, my understanding is that in 2009 and in at
 9 least 2008, all the governors issued proclamations.

10 A. That's correct.
 11 Q. And all of those proclamations designated a
 12 day of prayer, correct?
 13 A. Yes.
 14 Q. And all of them designated a National Day of
 15 Prayer that has been set aside by the President; is
 16 that correct?
 17 A. That's correct.
 18 Q. And, in fact, the task force encourages the
 19 governors to designate the same day as a day of prayer
 20 as the date set aside by the President, correct?
 21 A. We request it.
 22 Q. In 1988, President Reagan signed a law whereby
 23 the President is required to designate the first
 24 Thursday in May of each year as the National Day of
 25 Prayer; is that correct?

1 A. He signed in law that the first Thursday of
 2 May would be our nation's day of prayer, our National
 3 Day of Prayer, and he encouraged people of all faiths
 4 to participate in it.
 5 Q. The encouragement of all faiths to participate
 6 in it, that wasn't part of the law that he signed,
 7 though; is that correct?
 8 A. I don't remember what the law said. I would
 9 have to have somebody read it to me.
 10 Q. But, basically, it was from that point forward
 11 that there became a predictable date each year for the
 12 National Day of Prayer, correct?
 13 A. Correct.
 14 Q. Prior to that, the presidents were required to
 15 declare a National Day of Prayer after 1952 going
 16 forward, but no one knew exactly when it was going to
 17 be until the President actually did it, correct?
 18 A. Correct.
 19 Q. Having a predictable date makes it easier to
 20 organize activities in respect to the National Day of
 21 Prayer; is that correct?
 22 A. Yes.
 23 Q. For instance, a task force like yours would
 24 have trouble mobilizing the support for the National
 25 Day of Prayer if you didn't know well in advance when

1 it was going to be, correct?
 2 A. Correct.
 3 Q. The task force was created in 1988. Was it
 4 created before or after President Reagan signed into
 5 law the requirement that it be on the first Thursday in
 6 May?
 7 A. I don't know. I wasn't part of it then.
 8 Q. Were you at all aware that the creation of a
 9 task force was being discussed prior to its actual
 10 formation?
 11 A. No.
 12 MR. THERIOT: Objection, vague.
 13 A. No.
 14 Q. (BY MR. BOLTON) Did you have any involvement
 15 personally in lobbying for having a date certain
 16 specified for the National Day of Prayer?
 17 A. No.
 18 Q. Was Mr. Dobson involved in any such effort?
 19 A. No.
 20 Q. Was anyone involved in such an effort that you
 21 knew?
 22 A. Yes.
 23 Q. Who?
 24 A. Mrs. Vonette Bright.
 25 Q. Mrs. Bright?

1 A. Mrs. Vonette Bright.
 2 Q. And how do you know that?
 3 A. Because she told me. She told me how the day
 4 came about, the first Thursday of May.
 5 Q. And what did she tell you specifically?
 6 A. Well, she told me that she got up at 5 in the
 7 morning.
 8 Q. She told you what?
 9 A. She got up at 5 in the morning -- she lives in
 10 California -- and she called a couple of congressmen
 11 and there was a rabbi involved, and they began to talk
 12 about the possibility of setting a day for the National
 13 Day of Prayer. And so I guess -- I don't know, but
 14 perhaps a committee was formed and it came out of
 15 that.
 16 Q. And do you know the names of any of the
 17 congressional officials that she contacted?
 18 A. I don't recall that.
 19 Q. Was Strom Thurmond one of the backers of that
 20 legislation?
 21 A. I don't recall.
 22 Q. So did she tell you why she was actively
 23 trying to get such legislation passed?
 24 A. Well, of course, I'm sure she believed in the
 25 power of prayer, she believed that we should have a day

1 in this country where we cover this nation in prayer
 2 and the leaders. That was her heart, and she wanted to
 3 help facilitate that, if it was possible.
 4 Q. But there already was a requirement that there
 5 be a day of prayer designated by the President, it just
 6 wasn't precise when it would be; is that correct?
 7 A. That's correct.
 8 Q. Did she tell you why she wanted to have a date
 9 certain specified?
 10 A. No.
 11 Q. When did she tell you about her efforts?
 12 A. Well, she told me in 1988 when I became
 13 cochairman. But she also at various times, since she
 14 is the cochairman, speaks on behalf of the National Day
 15 of Prayer and just gives the history on how the day was
 16 set.
 17 Q. Were you aware, prior to being told by
 18 Mrs. Bright, that the President had set this particular
 19 day? Were you aware of that legislation having been
 20 signed by the President?
 21 A. I was not.
 22 Q. The National Prayer Committee, what is your
 23 understanding of what that entity is?
 24 A. Well, first of all, I am -- I guess I would
 25 say that I am the name, the voice and the face of the

1 National Day of Prayer. I'm the visible one for the
 2 National Day of Prayer Task Force. I don't really have
 3 a lot of knowledge about how the National Prayer
 4 Committee came together. You would have to really ask
 5 the chairman. I'm sorry. He's called the president,
 6 not the chairman.
 7 Q. Pardon me?
 8 A. The president, David Butts, B-u-t-t-s.
 9 Q. And he's the president of the National Prayer
 10 Committee?
 11 A. David Butts.
 12 Q. And you said the title is president of the
 13 National Prayer Committee?
 14 A. National Prayer Committee, yes.
 15 Q. And how long has he been the president?
 16 A. I don't know.
 17 Q. As long as you can remember? I mean, it's not
 18 just --
 19 A. No, there's been other presidents.
 20 Q. Okay. And are you telling me, in terms of the
 21 National Prayer Committee, at least just in a general
 22 sense, what it is and what it does, you do not have any
 23 knowledge?
 24 A. I know it's made up of different prayer
 25 ministries, people that have different prayer

1 ministries, and those people are listed on the back of
2 our letterhead, because we're accountable to the
3 National Prayer Committee.

4 Q. And the National Prayer Committee was formed
5 in 1982; is that correct?

6 A. I'm not sure.

7 Q. Do you know whether it was formed relatively
8 close in time to when the task force was set up?

9 A. I don't know.

10 Q. Does it have any purpose? Do you know,
11 generally, what the purpose of the National Prayer
12 Committee is?

13 A. I'm sure they have a purpose statement. I
14 haven't read it.

15 Q. If somebody asked you outside of a deposition
16 room what the purpose of the National Prayer Committee
17 is, would you have any at least a general answer that
18 you could give them?

19 A. I would think it would be to mobilize prayer.
20 We are a project of the National Prayer Committee, but
21 also the global day of prayer is a project of the
22 National Prayer Committee, and they have other projects
23 to mobilize prayer.

24 Q. Now, when you say the task force is a product
25 of the prayer committee, what do you mean by that?

1 A. We're accountable to them. We're not a
2 product. We're actually a project, j-e-c-t.

3 Q. Product? I'm not hearing you. I'm sorry.

4 A. A project.

5 Q. Okay. A project?

6 A. Not a product but a project.

7 Q. Project, okay. But in terms of the
8 organization of the task force, that was accomplished
9 by the prayer committee though; is that correct?

10 A. I'm not clear on your question.

11 Q. Well, when you say that you're a project of
12 the prayer committee, what do you mean by that?

13 A. Well, we're accountable to them. We're under
14 them. They're an umbrella for us.

15 Q. So ultimately as the chairman of the task
16 force, you are accountable to the prayer committee; is
17 that correct?

18 A. That's correct.

19 Q: Are there other entities that are accountable
20 to the prayer committee?

21 A. I'm not aware of them. They have other
22 projects.

23 Q. And in terms of the accountability that the
24 task force has to the prayer committee, is that
25 something that's specified in the organizational setup

1 of the task force?

2 A. I haven't seen that. I haven't seen any
3 paperwork on that.

4 Q. You just understand it to be the case?

5 A. Yes.

6 Q. You haven't seen bylaws or anything like that?
7 Does the task force have bylaws?

8 MR. ROSENBERG: Object as to form. It's
9 compound.

10 A. You would have to ask the executive director
11 of the task force.

12 Q. (BY MR. BOLTON) You've never seen bylaws for
13 the task force; is that correct?

14 A. I've seen a lot of paperwork. I don't
15 remember.

16 Q. In any event, your working understanding is
17 that the task force is accountable to the prayer
18 committee, correct?

19 A. Correct.

20 Q. In practice, what does that mean? How do they
21 hold you accountable?

22 A. Well, all of our funds are -- we have a CPA,
23 and so all of our funds are looked at, and, of course,
24 they meet with us once a year and keep in contact with
25 us through e-mails and phone calls, and I imagine if we

1 are not following the Judeo-Christian expression of the
2 National Day of Prayer, they would -- they could really
3 fire us, I guess. I don't take a salary. I volunteer
4 my time, but I imagine they could just dissolve the
5 task force.

6 Q. So you understand the prayer committee to
7 adhere to the Judeo-Christian orientation that you've
8 described as the task force also adhering to; is that
9 correct?

10 A. That's correct.

11 Q. Mission America, is that a name that you're
12 familiar with?

13 A. Yes.

14 Q. What is Mission America?

15 A. I don't know. I know it's a prayer -- you
16 know, it's a prayer ministry, but I don't know a lot
17 about it. I know it's a project -- it's another
18 project of -- I mean, I don't know if it's a project of
19 the National Prayer Committee, but I know that the
20 person that's in charge of it is a member of the
21 National Prayer Committee.

22 Q. The person in charge of Mission America is a
23 board member of the prayer committee?

24 A. I don't know that he's -- they have an
25 executive board. I don't know that he's a board

1 member.
 2 Q. In any event, there is a relationship then
 3 between Mission America and the prayer committee, to
 4 your understanding?
 5 A. I don't know.
 6 Q. Do you know why the prayer committee was
 7 established?
 8 A. The National Prayer Committee?
 9 Q. Right, the National Prayer Committee.
 10 A. I don't have an understanding of that. That
 11 was before my time.
 12 Q. And the origin of the National Prayer
 13 Committee is not something that you learned of
 14 subsequent to its creation? In other words, you said
 15 you weren't there at the time. Obviously, you know
 16 things that you weren't necessarily there to witness,
 17 correct?
 18 A. I don't recall.
 19 Q. In terms of the National Day of Prayer Task
 20 Force, you made reference to an executive director.
 21 A. Yes.
 22 Q. And who is the executive director of the task
 23 force?
 24 A. John Bornschein.
 25 Q. And what is the role of the executive

1 director?
 2 A. He actually runs the administrative part of
 3 the task force.
 4 Q. You have people that are involved in media and
 5 marketing; is that correct?
 6 A. Correct.
 7 Q. How many people do you have that perform that
 8 function for the task force?
 9 A. Two.
 10 Q. And are they currently Becky Armstrong and
 11 Jamie Staler?
 12 A. Correct.
 13 Q. And what is their function? What do they do
 14 for the task force?
 15 A. Becky is part-time, Jamie is full-time, and
 16 they -- if they have anyone -- any of the media calling
 17 for an interview from me, they set that up. They help
 18 with our catalogs, with our promotional efforts, radio
 19 spots.
 20 Q. And do they prepare press releases?
 21 A. Yes.
 22 Q. And when the task force issues a press
 23 release, do they have an inventory of media that they
 24 send their press releases to?
 25 A. Yes.

1 Q. Do you know about how many outlets they send
 2 their press releases to?
 3 A. I have no idea.
 4 Q. Is it quite a few?
 5 MR. ROSENBERG: Objection.
 6 Q. (BY MR. BOLTON) You just have no idea at
 7 all?
 8 A. I can't speculate on that.
 9 Q. Does the task force have -- you've got,
 10 roughly, ten employees at this point, correct?
 11 A. Uh-huh.
 12 Q. And you've got a large number of volunteers
 13 that work at the state and regional levels?
 14 A. That's correct. And some volunteers that
 15 aren't connected with the state or the regional. I
 16 mean, they are just moms and pastors and whoever wants
 17 to plan an event for the National Day of Prayer.
 18 Q. You don't have members, correct?
 19 A. No. They're all volunteers.
 20 Q. Do you have any sort of a list of people that
 21 the task force regularly sends out by e-mail updates on
 22 what the task force is doing, sort of a web list?
 23 A. Yes, we have a -- I would say a Christian
 24 constituent base.
 25 Q. And what does that mean?

1 A. People that -- well, we are privately funded,
 2 people that give, we have donors that give to the
 3 efforts of the National Day of Prayer Task Force, and
 4 we have many people that want to receive our mailings.
 5 They are constituents. Just like any ministry,
 6 National Day of Prayer is a ministry. We see it as a
 7 ministry to the nation.
 8 Q. Does the task force maintain a list of such
 9 people that it regularly communicates with by e-mail?
 10 A. Yes.
 11 Q. And do you know about how many people are on
 12 that list?
 13 A. I don't.
 14 Q. Does the task force prepare a newsletter?
 15 A. Yes.
 16 Q. And how often is the newsletter prepared?
 17 A. I think we send it out three times a year.
 18 It's an update.
 19 Q. And is that a hard copy, or is that sent
 20 electronically to the people that it's distributed
 21 to?
 22 A. I know we send out hard copies. I'm not sure
 23 about the electronics part of it. You would have to
 24 check with the executive director.
 25 Q. Do you know, approximately, what your current

1 circulation is for the newsletter?
 2 A. You would have to ask the executive director.
 3 Q. Is it fair to say that you don't have any idea
 4 what the --
 5 A. I don't, because I'm not really -- you know,
 6 as I said, I'm the name, the face and the voice. I
 7 don't handle the administrative part of the office.
 8 I'm the visible face I guess you would say.
 9 Q. And about how much time do you spend on
 10 National Day of Prayer Task Force activities?
 11 A. Well, I'm a volunteer, so I always attend the
 12 managers' meetings to get an update. And mostly it's
 13 by e-mail. If they need to meet with them, I'm always
 14 available. I would say not a lot.
 15 Q. Is it less than when you began as the chair in
 16 1991?
 17 A. Yes.
 18 Q. When you began in 1991, was it pretty much a
 19 full-time job initially?
 20 A. Pretty much.
 21 Q. And how long did it remain pretty much a
 22 full-time job?
 23 A. Well, as the task force grew, it lightened my
 24 load.
 25 Q. It what?

1 A. No. We are housed here, but we pay for all
 2 the services that Focus provides for us. We pay for
 3 broadcast time, we pay for print. Whatever services,
 4 they bill us. They're just like a vendor, and so we
 5 pay for their services. So we're just housed here, but
 6 we're not part of Focus on the Family.
 7 Q. Has that vendor relationship always existed
 8 since the task force has been located in the Focus on
 9 the Family offices?
 10 A. I don't recall. That's 20 years ago.
 11 Q. In terms of the billing arrangements, is the
 12 task force billed on an annual basis or a monthly
 13 basis?
 14 A. Annual.
 15 Q. And for those sorts of services and space
 16 provided by Focus on the Family, do you know what you
 17 were billed or what the task force was billed --
 18 A. You would have to ask the executive
 19 director.
 20 Q. Is it fair to say that you don't know?
 21 A. I don't know for sure what the actual amount
 22 is.
 23 Q. The budget of the task force for 2008, roughly
 24 how much did the task force spend in 2008?
 25 A. You would have to ask John Bornschein.

1 A. As the task force grew, as we had more people
 2 to help, it lightened my load.
 3 Q. And when you say as it grew, do you mean in
 4 terms of the number of people that were employed by the
 5 task force?
 6 A. Yes, and the tasks that they took over.
 7 Q. Do you know why Mrs. Bright asked you in 1988
 8 whether you would be a cochair for the task force?
 9 A. No, I don't, other than she trusted -- I guess
 10 she trusted me. She saw me as somebody that could --
 11 was capable to take over the chairmanship, but I'm
 12 speculating. I don't really know her heart on that.
 13 Q. How did it come about that the offices of the
 14 task force were relocated from California to the Focus
 15 on the Family offices?
 16 A. Well, Focus on the Family moved to Colorado
 17 Springs in 1991. So, of course, I moved with it. And
 18 since I had accepted the chairmanship, the ministry
 19 moved here.
 20 Q. And the Focus on the Family moved to Colorado
 21 Springs from where?
 22 A. From Pomona, California.
 23 Q. Was there ever any consideration of having the
 24 offices of the task force in a separate location from
 25 Focus on the Family when you took over?

1 Q. The overall budget of the task force is not
 2 anything that you even have a rough approximation of?
 3 A. I could be wrong and I could be right. I
 4 would say it's about 1.2 million.
 5 Q. Currently?
 6 A. I don't know. I don't know for sure.
 7 Q. Certainly we're not talking about 2002? When
 8 you say 1.2 million --
 9 A. We're talking 2009.
 10 Q. Okay. Michael Calhoun is responsible for
 11 strategic partnerships; is that correct?
 12 A. Uh-huh.
 13 Q. And what does that mean? What does he do?
 14 A. The seven centers of power, if you look at it
 15 as the church, it's the media, it's the military, so he
 16 usually networks with people in that venture, in the
 17 seven centers of power. For instance, at some of our
 18 events, we might want to have a representative from
 19 Hollywood in the media, so he would be the one that
 20 would contact that person, see if they were available,
 21 or a military person.
 22 Q. Are there any strategic partnerships that are
 23 more enduring, in other words, rather than, you know,
 24 for some particular event? She has to have a yes or a
 25 no.

1 A. I don't recall.
 2 Q. So in terms of whether or not there are any
 3 long-term strategic partnerships that the task force
 4 has, you do not know?
 5 A. I don't know.
 6 Q. Are there any strategic partnerships that
 7 you're aware of that no longer exist?
 8 A. Yes.
 9 Q. Can you give me an example?
 10 A. Well, we had a donor that owned a car in the
 11 NASCAR races, and he would paint his car with the
 12 National Day of Prayer logo.
 13 Q. He did what?
 14 A. He would paint his car with the National Day
 15 of Prayer logo to just help promote the National Day of
 16 Prayer, and so he no longer is doing that. It became
 17 too expensive for him. He needed people like Lowe's
 18 and Home Depot to sponsor his car.
 19 Q. How was the logo selected?
 20 A. I think one of the artists in the National Day
 21 of Prayer helped us put it together. We had many
 22 different renderings, and we all chose that one. The
 23 task force chose that one.
 24 Q. Many of the renderings, though, include the
 25 NDP with an American flag next to it; is that

1 MR. BOLTON: And I think we're all in
 2 agreement on that.
 3 MR. THERIOT: Right.
 4 Q. (BY MR. BOLTON) Gayle Sharman is listed as
 5 responsible for customer relations for the task force;
 6 is that correct?
 7 A. (Witness indicating in the affirmative.)
 8 Q. What does that involve?
 9 A. I think she has a new title now. Is that up
 10 to date?
 11 Q. I don't know. I'm not sure just what the date
 12 is. This was something that was produced during
 13 discovery. Is Gayle still working for the task
 14 force?
 15 A. Yes.
 16 Q. And her job hasn't changed; it's just the
 17 title may have changed?
 18 A. You would have to ask John Bornschein. John
 19 Bornschein is over all the administrative part of the
 20 ministry, and everybody reports to him, not to me. So
 21 titles may change, jobs may change within the
 22 department.
 23 Q. The description, customer relations, is that a
 24 title that previously existed, as far as you know?
 25 A. Probably so.

1 correct?
 2 A. Usually.
 3 Q. Pardon?
 4 A. Usually.
 5 Q. And why was the American flag chosen as a
 6 prominent part of the task force logo?
 7 A. Well, this is our National Day of Prayer set
 8 aside by our Congress, and so it's a day when we pray
 9 for our country and for our leaders, and that
 10 symbolizes our country.
 11 Q. Is there anything in the logo or any of the
 12 logos that the task force uses that depicts its
 13 Christian-Judeo orientation?
 14 A. In the logo?
 15 Q. Yes.
 16 A. No.
 17 MR. THERIOT: Rich, we've been going for about
 18 an hour.
 19 MR. BOLTON: We can take a break.
 20 (A recess was taken.)
 21 MR. ROSENBERG: Before the deposition, the
 22 parties agreed that any objection made by one party
 23 shall be made as to all parties in the deposition so
 24 that other parties do not have to separately join in
 25 that objection.

1 Q. Pardon?
 2 A. Probably so.
 3 Q. In terms of the task force customers, is that
 4 what basically the constituency that you referred to,
 5 or is it something different?
 6 A. I believe she's over ordering. Somebody
 7 orders -- wants a catalog or a bookmark or a bumper
 8 sticker or whatever, I believe she's over that;
 9 resources.
 10 Q. Lisa Crump, is she still with the task
 11 force?
 12 A. Yes.
 13 Q. And at least the chain of responsibilities
 14 that I have lists her as involved with the national
 15 network. Is that still what she does?
 16 A. She's over all the coordinators, the state
 17 coordinators, the regional. We have national area
 18 leaders. They're over like six or seven states.
 19 Q. Carol Mock is the military liaison; is that
 20 correct?
 21 A. That's correct.
 22 Q. And Faye Tharp is involved with public
 23 affairs?
 24 A. That's right.
 25 Q. What does her work involve?

1 A. Constituent building, making friends. She's
 2 in charge of donors.
 3 Q. Does she travel much for that?
 4 A. Some.
 5 Q. We were talking a little bit earlier about the
 6 task force encouraging governors to issue
 7 proclamations. That was something that really wasn't
 8 widely done before you became the chairman of the task
 9 force; is that correct?

10 A. I don't know.
 11 Q. Do you know whether the number of

12 proclamations that are issued by governors has
 13 increased under your chairmanship?

14 A. Yes, it has increased.

15 Q. And I understand that you described the letter
 16 would be written and signed by you and sent to each of
 17 the governors, correct?

18 A. That's correct.

19 Q. When did you start sending letters to each of
 20 the governors?

21 A. I've been chairman for 19 years, and I can't
 22 tell you the exact time when we did that. I know that

23 Mrs. Bright also requested governors sign a
 24 proclamation for the National Day of Prayer.

25 Q. And if you don't get a proclamation from a

1 governor, is there any pressure put on the governor to
 2 issue a National Day of Prayer proclamation?

3 A. Not from the task force. It's only a
 4 request.

5 Q. Pardon me?
 6 A. Our letter is only a request.

7 Q. Now, a couple of years back, Eliot Spitzer,
 8 the governor of New York, was fairly late in issuing
 9 his proclamation. Do you recall that?

10 A. Yes.
 11 Q. And my understanding is that someone on behalf

12 of the task force had contacted his office several
 13 times to see whether or not a proclamation would be
 14 forthcoming. Would that type of contact be unusual?

15 A. I would say yes.

16 Q. I mean, the task force was certainly aware
 17 that Governor Spitzer was the last governor who had not

18 yet issued a proclamation; is that correct?

19 A. Correct.

20 Q. You knew that he was still unaccounted for in
 21 terms of his proclamation, correct?

22 A. I was told that.

23 Q. Okay. And you were told that by people that
 24 you work with, correct?
 25 A. Yes.

1 Q. And people, when they told you something,
 2 you -- I mean, they had a history of reporting
 3 correctly to you, correct?

4 A. Usually the task force, as the proclamations
 5 are coming in, they let me know that they're excited
 6 that we have 5, 10, 30. You know, I get reports.

7 Q. And then these proclamations at some point you
 8 start posting on the task force Website, correct?

9 A. Correct.
 10 Q. Do you know when that began?

11 A. I don't.
 12 Q. And I understand that all the state

13 proclamations are bound and made in a real presentable
 14 package and given to the President; is that correct?

15 A. It was given to President Bush.
 16 Q. Was that something that was unique during

17 President Bush's presidency?
 18 A: It was unique that we were given 50

19 proclamations, and we thought we would make a nice gift
 20 for the President on the National Day of Prayer.

21 Q. And so prior to actually having all 50
 22 governors accounted for, you hadn't done that?

23 A. Right. Correct.
 24 Q. Some of the letters to the governors, before

25 you got the proclamations, encouraged them indicating

1 that that was what you intended to do; is that
 2 correct?

3 A. I don't recall what was in the letters.
 4 Q. Now, with regard to Governor Spitzer, my

5 understanding is that from some quarters, a fair amount
 6 of pressure was put forth for him to sign the

7 proclamation, correct?
 8 MR. ROSENBERG: Objection, form.

9 A. I have no understanding of that.
 10 Q. (BY MR. BOLTON) Pardon?

11 A. I have no understanding of any pressure that
 12 was put on him.

13 Q. You don't?
 14 A. No.

15 Q. Okay. If I told you that Mr. Dobson had
 16 criticized the governor on his radio program for not

17 having issued a proclamation, would that surprise
 18 you?

19 A. No.
 20 Q. And that he had sent out a mass e-mail to

21 people encouraging them to essentially raise a fuss
 22 about the governor not having issued a proclamation,

23 would that surprise you?
 24 A. I have no knowledge of that.

25 Q. Never even heard that that might have

1 happened?
 2 A. Not an e-mail.
 3 Q. Pardon?
 4 A. I wasn't aware of an e-mail that was sent
 5 out.
 6 Q. But the radio coverage by Mr. Dobson you're
 7 aware of, correct?
 8 A. I am.
 9 Q. And how did it come about that Mr. Dobson was
 10 even aware that Governor Spitzer had not yet submitted
 11 his proclamation?
 12 MR. THERIOT: Objection, calls for
 13 speculation. You may answer.
 14 A. I can't speculate.
 15 Q. (BY MR. BOLTON) Well, you know Mr. Dobson,
 16 obviously.
 17 A. Pretty well.
 18 Q. Did you tell Mr. Dobson that New York was
 19 unaccounted for?
 20 A. I don't recall.
 21 Q. Were you surprised that Mr. Dobson had made
 22 this a subject of his radio program?
 23 A. No.
 24 Q. Are you aware of any other governors who
 25 were subject to at least public criticism for not

1 use?
 2 A. Not for the governors.
 3 Q. Any other public officials?
 4 A. You mean draft a proclamation for them?
 5 Q. Uh-huh.
 6 A. We have -- yes, we have done that for the
 7 White House, because we know how busy the President is,
 8 and so we draft it, but not one president has ever used
 9 it. I think once or twice we've seen a sentence that's
 10 been used, but they have their own writers and they
 11 write their own proclamations.
 12 Q. When did the task force begin choosing a theme
 13 for each year's National Day of Prayer?
 14 A. Since I became chairman.
 15 Q. So that was something that you began right off
 16 the bat?
 17 A. Yes.
 18 Q. And when you began choosing an annual theme,
 19 was there also from that very beginning a selection of
 20 a biblical reference that was also used in association
 21 with the theme?
 22 A. We call it a supporting scripture, yes.
 23 Q. And how is the annual theme selected?
 24 A. I go before the Lord every year in prayer, and
 25 I ask him, what is on his heart for our nation. And

1 having issued a proclamation, other than Governor
 2 Spitzer?
 3 A. Well, of course, every state coordinator hopes
 4 that the governor will proclaim prayer in the state on
 5 the National Day of Prayer. So I'm sure the state
 6 coordinators made contact with Governor Spitzer and any
 7 other governor, because they're hoping that the
 8 governor will support our nation's day of prayer.
 9 Q. But in terms of any other specific instances,
 10 you're not aware of?
 11 A. The wrestler -- who was the governor that was
 12 the wrestler?
 13 Q. Governor Ventura.
 14 A. He did not issue a proclamation.
 15 Q. And was any effort made to get him to get on
 16 board and issue a proclamation?
 17 A. Not from the task force and not from the state
 18 coordinators, as far as I know. We instruct them not
 19 to put any pressure on anybody, governor or mayor,
 20 anybody to sign a proclamation. It's just a request.
 21 Q. When you write to the governors, do you
 22 include a suggested proclamation for them?
 23 A. No, we don't write one for them.
 24 Q. Have you ever ghostwritten any proclamation
 25 that an official could decide to use or decide not to

1 then I look at the culture, what's going on in the
 2 culture. And through prayer, He usually gives me the
 3 perfect theme for that year.
 4 Q. And then the same process for choosing the
 5 supporting scripture?
 6 A. Yes.
 7 Q. And is there a particular -- I mean, all the
 8 supporting scripture comes from the Bible; is that
 9 correct?
 10 A. Correct.
 11 Q. You've never used supporting scripture from
 12 any other source, correct?
 13 A. Correct.
 14 Q. And would you consider using any other
 15 source?
 16 A. No. Because, as I said, we are the
 17 Judeo-Christian expression, so we would use the
 18 Christian Bible. We would find a scripture from the
 19 God of the Bible. Sometimes it's from the Old
 20 Testament, sometimes it's from the New Testament.
 21 Q. And would your constituency, the task force
 22 constituency, recognize that source for the supporting
 23 scripture?
 24 A. Yes, I believe they would.
 25 Q. Now, my understanding is that when you send

1 letters to the governors, you also encourage them to
2 include your annual theme and supporting scripture
3 within their own proclamations; is that correct?

4 A. Not true, no.

5 Q. And my understanding, though, is that at least
6 in the last few years, many, if not most, of the
7 governors are including the annual theme?

8 MR. THERIOT: Objection, vague.

9 A. I don't know.

10 Q. (BY MR. BOLTON) You don't know that?

11 A. I don't know.

12 Q. No? Is there any reference made to the
13 supporting scripture and the annual theme in the letter
14 that you send to the governors?

15 A. Yes, all the letters that go out have our
16 theme and the supporting scripture, but we don't ask
17 them to use it. We don't ask the governors to use it.
18 We just list it in the letter. If they choose to use
19 it, it's up to them.

20 Q. Are you hopeful that they'll use it?

21 A. It would be nice.

22 Q. Why?

23 A. Well, because I feel like that that particular
24 theme, you know, was given to me by the Lord. For
25 instance, the 2009 theme is for Prayer for Such a Time

1 not always aware of what the governors -- I don't read
2 every one of them. They're kept in the office and
3 compiled there.

4 Q. Is there any reason why, in your letter to the
5 governors, that you would include a reference to the
6 Judeo-Christian expression of the annual theme and
7 supporting scripture that you've selected?

8 A. The theme and the supporting scripture is part
9 of our -- part of the letters that we send out. Almost
10 all of the letters on the National Day of Prayer, we
11 alert people to what the Judeo-Christian theme is going
12 to be, and some use it. Some churches use it, some
13 don't. Some prayer gatherings use it, some don't. I
14 imagine some governors use it in their proclamations,
15 but I'm not aware of it.

16 Q. Do you think it's appropriate for a governor
17 to include a Judeo-Christian expression in their annual
18 proclamation?

19 A. I wouldn't speculate on that.

20 Q. Certainly from your perspective, though,
21 you're not opposed to it? You're not opposed to it,
22 correct?

23 A. No.

24 Q. And that's why you include it in the letters
25 to the governors, isn't it?

1 As This. I would say that 40,000 volunteers and
2 coordinators are going to be using that theme, and it
3 would be nice if the governor chose to, but there's no
4 pressure. It's just listed in the letter. It's just
5 listed in the letter that we send to them.

6 Q. And the theme and the supporting scripture has
7 been incorporated in some presidential proclamations as
8 well; is that correct?

9 A. I don't know. I don't recall. I don't think
10 it has.

11 Q. Pardon me?

12 A. I don't think a President has ever put the
13 theme in the proclamation.

14 Q. But a number of governors have, correct?

15 A. I don't recall.

16 Q. Has anyone at the task force ever reported to
17 you that at least some governors have incorporated the
18 theme and the supporting scripture?

19 A. No.

20 Q. Is my mentioning it right now the first time
21 you've ever heard that?

22 A. The first Thursday of May is a very --

23 Q. Pardon me?

24 A. The first Thursday of May is a very busy time
25 in our office, and so as the proclamations come in, I'm

1 A. It's just a statement of what the theme is and
2 what the supporting scripture is. We don't know what
3 the governor is going to do with it.

4 Q. Why did you start choosing an annual theme?

5 A. I think a theme is good. It brings unity to
6 the nation.

7 Q. Certainly there's nothing, though, in the
8 legislative requirement that the President dedicate a
9 day of prayer that requires any sort of annual theme,
10 correct?

11 A. No.

12 Q. There's nothing that requires any sort of
13 reference to supporting scripture, correct?

14 A. Correct.

15 Q. And so to the extent that these things are
16 incorporated into presidential proclamations or
17 governor proclamations, that is not something that is
18 legally required, correct?

19 MR. ROSENBERG: Objection, calls for a legal
20 conclusion.

21 Q. (BY MR. BOLTON) You're not aware that it's
22 required, correct?

23 A. No.

24 MR. ROSENBERG: Same objection.

25 Q. (BY MR. BOLTON) Are you aware of any

1 expression of any other specific religious orientation
 2 that's ever been incorporated into a governor's
 3 proclamation?
 4 A. I'm not aware of it.
 5 Q. Or presidential proclamation?
 6 A. I'm not aware of it.
 7 MR. THERIOT: I'm going to object to that
 8 question, because it assumes facts not established.
 9 Q. (BY MR. BOLTON) The task force objective of
 10 encouraging prayer, that general goal could certainly
 11 be accomplished without any specific reference to the
 12 National Day of Prayer, correct?
 13 A. The task force is to publicize and promote and
 14 continue the tradition of a National Day of Prayer.
 15 Q. But the goal of encouraging prayer, that goal,
 16 if you wanted to, could be done without being tied to
 17 the National Day of Prayer, correct?
 18 A. It could, but the National Day of Prayer is a
 19 rallying point. It's a day when we're focusing on
 20 prayer for our country.
 21 Q. And you know that because it's declared as
 22 such by the President each year?
 23 A. Correct.
 24 Q. Thinking back, do you know when you first
 25 became aware of the National Day of Prayer?

1 A. I would say 1987.
 2 Q. Pardon?
 3 A. 1987.
 4 Q. And how did you become aware of it?
 5 A. Mainly through Mrs. Vonette Bright, our
 6 friendship with the Brights.
 7 Q. And that initial understanding or that initial
 8 awareness of the National Day of Prayer, what did you
 9 understand the National Day of Prayer to be?
 10 A. A day set aside for prayer in our nation, just
 11 like Veterans' Day or 4th of July. It was a special
 12 day, and on this occasion, for prayer.
 13 Q. And certainly you understand that prayer has
 14 an integral relationship to religion; is that
 15 correct?
 16 MR. THERIOT: Objection, calls for
 17 speculation.
 18 A. I can't speculate on that.
 19 Q. (BY MR. BOLTON) So whether or not prayer has a
 20 connection to religion, that would require you to
 21 engage in speculation?
 22 A. Well, I can only speak for the Christian
 23 prayer.
 24 Q. Pardon me?
 25 A. I can only speak for the Christian prayer.

1 Q. Do you know of prayer being used in a
 2 nonreligious context?
 3 A. I can't speculate on that.
 4 Q. Certainly as you understood the National Day
 5 of Prayer as a day set aside for prayer, though, you
 6 understood it to have a relationship to religion; is
 7 that correct?
 8 A. Well, in the Christian faith, we don't talk
 9 about religion. We talk about a relationship, a
 10 relationship with God, and so I'm not sure what you're
 11 asking.
 12 Q. Okay. So you wouldn't associate prayer, even
 13 in the Christian-Judeo orientation, as a religious
 14 concept but as something that is related to
 15 establishing and having a relationship with the God of
 16 the Bible, correct?
 17 A. I would say that is correct.
 18 Q. Do you associate the Bible as having a
 19 religious relationship?
 20 A. The Bible is the Christian Bible. So if you
 21 want to call Christianity a religion, then the Bible
 22 would, of course, be our handbook.
 23 Q. Whether or not we connect the relationship to
 24 the God of the Bible as being a religious concept,
 25 certainly you associate prayer with that relationship,

1 with that relationship with the God as you know it?
 2 A. Yes.
 3 Q. You talk about prayer in terms of the National
 4 Day of Prayer. When the National Day of Prayer Task
 5 Force makes reference to prayer, that is the definition
 6 that you're using, the relationship with the God of the
 7 Bible?
 8 A. Correct.
 9 Q. What is the National Day of Prayer four-step
 10 approach?
 11 A. Pardon me?
 12 Q. Have you ever heard of the National Day of
 13 Prayer four-step approach to effective communication
 14 with God?
 15 A. Are you talking about the PRAY acronym?
 16 Q. Am I correct that you've described it as the
 17 National Day of Prayer four-step approach to effective
 18 communication with God?
 19 A. Are you talking about the PRAY acronym?
 20 Q. Yes.
 21 A. Yes. That's just a way to pray. That's just
 22 one way to pray.
 23 Q. And in your book, Certain Peace in Uncertain
 24 Times, Embracing Prayer in an Anxious Time, you make
 25 reference to that four-step approach and identify it as

1 something associated with the National Day of Prayer,
2 correct?

3 A. Correct.

4 Q. How is that association made? How do you
5 promote that four-step approach to prayer?

6 A. It's just one way to pray. It's just a way to
7 remember the steps to, you know -- for instance, we
8 took it from pray, and the P would be praise, to start
9 out your prayer with praise. This is not necessarily
10 on the National Day of Prayer. This is any time. This
11 is an acronym for prayer any time. And then the R is
12 for repent. The scriptures tell us that we are to
13 repent before an Almighty God when we have sinned
14 against him. And then the A is ask, praying for our --
15 praying for whatever needs we have in our life, and
16 then the Y is to yield, and say, Not my will but Thine
17 be done.

18 Q. When did you begin associating that four-step
19 approach with the National Day of Prayer?

20 A. I don't recall the exact year we did that.

21 Q. My understanding is that you consider prayer
22 to be important not just to individuals but also to
23 entire nations; is that correct?

24 A. Absolutely correct.

25 Q. And what do you mean by that?

1 A. Well, I believe that we serve an Almighty God,
2 and that I believe in his creation, I believe that He
3 blesses or brings judgment on the nation as to how they
4 see Him, how they honor Him.

5 Q. And that prayer at the national level that
6 you're talking about, again, from your perspective,
7 from the task force's perspective rather, you're
8 talking about a particular type of prayer, prayer to
9 the God of the Bible, correct?

10 A. The Judeo-Christian expression of the National
11 Day of Prayer is to pray to the God of the Bible, but
12 other faiths can pray to whomever their God is. There
13 may be other task forces out there. We're not aware of
14 them.

15 Q. But in terms of providing that protective
16 shield for the nation, it is the task force's view that
17 praying to other gods is not going to provide that same
18 protective shield as the expression in the
19 Christian-Judeo prayer; is that correct?

20 A. I let God judge people's prayers. I don't
21 judge them. I don't know how He hears their prayers.

22 Q. Do you think that all prayers, in terms of
23 protecting the nation, are equal?

24 A. I can't speculate on that. I don't know how
25 God sees that.

1 Q. But you believe that the prayer to the God
2 that you pray to is -- I mean, at least as the task
3 force views it, that that is a particular God and that
4 that is the right God to pray to, correct?

5 A. We pray to our Almighty God.

6 Q. And so other people may pray to different
7 gods, correct?

8 A. Correct.

9 Q. But at least in the view of the task force,
10 and its belief in the Christian-Judeo expression, that
11 those prayers would not be as effective for the nation
12 as the expression of prayer that you promote,
13 correct?

14 A. I can't say that.

15 Q. But you don't consider all prayer to be equal,
16 right?

17 A. I believe -- my personal belief is that I
18 believe there is one God, and that's the God that we
19 pray to.

20 Q. And while others may pray to a different God
21 then, you at least believe that prayer to the God that
22 you believe in is the one that is most effective,
23 correct?

24 MR. THERIOT: I'm going to object. I think it
25 calls for speculation. She can certainly testify

1 on her personal beliefs about what she believes in her
2 prayers. But what other people's prayers are, I don't
3 know how she can testify to that.

4 Q. (BY MR. BOLTON) Well, tell me what you believe
5 then.

6 A. I believe what the Bible says. God says that
7 He is the one and only God, and his son, Jesus Christ,
8 is the way -- is our salvation to God. So that's my
9 personal belief, and I would say that's the belief of
10 the Christian church.

11 Q. What would be your reaction to a governor
12 including an annual theme and reference from some holy
13 book or source, other than the Bible, in their
14 proclamation?

15 A. The governor can sign the proclamation however
16 he wants to. We have no authority over that, and if he
17 wants to use his own theme -- for instance, if we have
18 a Muslim governor and he wants to use a Muslim theme
19 and proclaim that Muslim day of prayer in his state,
20 there's nothing we can do about that. That's totally
21 up to the governor.

22 Q. But at least in terms of providing that
23 protective shield, you would be skeptical that that
24 would be as effective as including a scriptural
25 reference from the Bible?

1 A. My personal belief is that the God of the
 2 Bible is the one who protects, blesses and protects a
 3 nation.
 4 Q. How does praying provide a protective
 5 shield?
 6 A. Well, I believe that the God of the Bible has
 7 the ultimate -- is ultimately in control of the whole
 8 universe, of the earth, of the continents, of the
 9 community, of the states. I believe He is involved in
 10 everything, and He is Almighty and He can bless or He
 11 can curse.
 12 Q. And having that protective shield at the
 13 national level is a good thing, correct?
 14 A. Of course.
 15 Q. What is corporate prayer?
 16 A. Corporate prayer is, you know, people
 17 gathering together, more than two, but prayer
 18 gatherings, it could be 5, 10, it could be 40,000.
 19 It's people gathering together to pray.
 20 Q. And in the task force activities organized
 21 around the National Day of Prayer, certainly corporate
 22 prayer is something that the volunteers and state
 23 coordinators are encouraged to promote, correct?
 24 A. We believe that our constitutional rights are
 25 to gather, to worship and to pray.

1 that, correct?
 2 A. Yes, correct.
 3 Q. And did you ever discuss the National Day of
 4 Prayer and what it meant with President Bush?
 5 A. No.
 6 MR. ROSENBERG: Objection. Which President
 7 Bush?
 8 A. Neither.
 9 Q. (BY MR. BOLTON) Pardon?
 10 A. Neither one of them. I never discussed it
 11 with them.
 12 Q. But in terms of the White House functions,
 13 they were with George W. Bush, correct?
 14 A. Correct. There was one with his father, and
 15 he gave a reception on the National Day of Prayer.
 16 Q. And how many National Day of Prayer functions
 17 have you attended in the White House?
 18 A. Would the Rose Garden be considered the White
 19 House?
 20 Q. Let's consider it part of the White House.
 21 A. Okay. Ten.
 22 Q. And a number of these were held in the East
 23 Room?
 24 A. Yes.
 25 Q. These particular locations with regard to the

1 Q. And so certainly corporate prayer, or the
 2 gathering for prayer, is an important part of the task
 3 force's objective, correct?
 4 A. No. I would say the objective is for -- to
 5 mobilize the Christian community to pray either in
 6 their homes, around their dinner tables, in their
 7 churches, or in the public square, however they want to
 8 celebrate this nation's day of prayer.
 9 Q. Certainly, though, the volunteers and the
 10 state coordinators are -- I mean, what their intent to
 11 do is organize activities around the National Day of
 12 Prayer that will involve corporate prayer, correct?
 13 A. Correct. They like to organize a prayer
 14 gathering.
 15 Q. Now, did you know President Reagan?
 16 A. Not personally. I've met him, but I can't say
 17 I know him.
 18 Q. Did you ever discuss the National Day of
 19 Prayer with President Reagan?
 20 A. Never.
 21 Q. Have you discussed the National Day of Prayer
 22 with any president?
 23 A. Never.
 24 Q. When you would participate in National Day of
 25 Prayer activities in the White House -- and you did do

1 White House and functions of the National Day of
 2 Prayer, were they activities that were organized by the
 3 task force?
 4 A. No.
 5 Q. And can you describe these functions that you
 6 attended at the White House?
 7 A. Well, the President would decide whether he
 8 was going to have a prayer observance or not. So if he
 9 had a prayer observance, we were invited to come, but
 10 also he had his own personal list of who he invited.
 11 And other religions were there, not just our task
 12 force.
 13 Q. Do you know how it came about that these
 14 occasions, these functions, began to be hosted by the
 15 President?
 16 MR. THERIOT: Objection, calls for
 17 speculation. You may answer.
 18 A. Well, I don't recall, because President Ronald
 19 Reagan just had a breakfast, and we were invited.
 20 Q. (BY MR. BOLTON) So you attended a national
 21 prayer breakfast?
 22 A. National Day of Prayer breakfast.
 23 Q. Was it held on the National Day of Prayer?
 24 A. Yes.
 25 Q. And when was that?

1 A. Well, whenever Ronald Reagan was in office. I
 2 can't recall the exact year, but during his tenure.
 3 Q. And when you attended the White House national
 4 prayer day functions, you attended, obviously?
 5 A. Yes, I was invited.
 6 Q. Mr. Dobson attended?
 7 A. Yes.
 8 Q. Did you speak?
 9 A. Yes.
 10 Q. How many times have you spoken at a White
 11 House function in regard to the National Day of
 12 Prayer?
 13 A. Eight.
 14 Q. And did your husband speak at any of these?
 15 A. No.
 16 Q. Did you speak as a representative of the task
 17 force?
 18 A. No.
 19 Q. Did you speak as an individual?
 20 A. Yes, as the chairman of the National Day of
 21 Prayer.
 22 Q. Okay. So you were asked to attend as the
 23 chairman of the National Day of Prayer?
 24 A. No. I was just asked to attend.
 25 Q. Pardon me?

1 A. I was just asked to attend.
 2 Q. Okay. You must have been asked to speak too.
 3 A. I was.
 4 Q. And you spoke about the importance of prayer,
 5 correct?
 6 A. In our country, correct.
 7 Q. Now, my understanding is that there are other
 8 Washington, D.C. -- or that there are Washington, D.C.
 9 national prayer day activities that the task force is
 10 involved in organizing; is that correct?
 11 A. That's correct.
 12 Q. Can you describe those activities?
 13 A. Well, on Wednesday night before the National
 14 Day of Prayer, we have a reception.
 15 Q. Where is the reception held?
 16 A. Usually at a hotel. Sometimes it's at the
 17 J.W. Marriott or whatever. And that's mainly for our
 18 donors that contribute to the National Day of Prayer
 19 and friends that live in Washington, D.C. Some
 20 religious leaders come and some congressmen attend.
 21 And they usually -- we send out invitations, and then
 22 they let us know whether they're coming or not.
 23 Q. And that's the night before?
 24 A. Uh-huh.
 25 Q. And then there must be some activities that

1 you're involved in organizing in the capitol on the
 2 actual designated day, correct?
 3 A. Correct.
 4 Q. Not just functions that you attend, but
 5 functions that are organized by the task force,
 6 correct?
 7 A. Correct.
 8 Q. Describe those activities.
 9 A. We have a prayer gathering at the Cannon House
 10 office building on the National Day of Prayer.
 11 Q. And how long has the task force been hosting
 12 that or organizing that activity?
 13 A. That was hosted under Mrs. Vonette Bright, so
 14 I don't know. Whenever she -- they started.
 15 Q. So it preceded your chairmanship?
 16 A. Correct.
 17 Q. And it continued under your chairmanship,
 18 correct?
 19 A. Correct.
 20 Q. And it's continued without interruption under
 21 your chairmanship, correct?
 22 A. Correct.
 23 Q. And it's one of the most important activities
 24 organized by the task force, correct?
 25 A. I would say it's not any more important than

1 any other prayer gathering across the nation. We're
 2 there because that's the seat of our government, and
 3 we're there to pray for our leaders, for the President,
 4 for his cabinet, for all those that lead our country.
 5 Q. Is it important that it's held in the Cannon
 6 office building?
 7 A. I think because it's a nice room.
 8 Q. It's what?
 9 A. It's a nice room. And, again, it's in
 10 Washington, D.C., and we feel that's the seat of our
 11 government, and it's easy access for the congressmen
 12 and the senators because it's right there if they
 13 choose to drop in.
 14 Q. And the Cannon office building is a government
 15 building, correct?
 16 A. Correct.
 17 Q. And my understanding is that you invite
 18 representatives of the executive branch to attend,
 19 correct?
 20 A. Correct.
 21 Q. And you've had individuals from the executive
 22 branch attend, correct?
 23 A. We invite the three branches of government.
 24 We invite a representative from the executive branch,
 25 from the legislative branch, from the judicial branch,

1 and a representative from the military, and we see them
2 as standing in the gap for their particular office
3 across the land.

4 Q. And so the actual activities held in the
5 Cannon office building, presumably it involves just
6 more than getting these people together, correct?
7 You've got a program?

8 A. We have a prayer service.

9 Q. And are the representatives from the different
10 branches of government asked to speak at this prayer
11 service?

12 A. Yes.

13 Q. And have they in the past?

14 A. Yes.

15 Q. Representatives of the executive branch have,
16 correct?

17 A. Yes.

18 Q. And the legislative branch as well, correct?

19 A. Yes.

20 Q. Have you had any speaker from the judicial
21 branch?

22 A. Yes.

23 Q. And they're given at least a little suggestion
24 of what you would like them to address in their
25 remarks, correct?

1 A. Correct.

2 Q. You asked them to speak to the importance of
3 religion in their own life, correct?

4 A. No. We ask them to give us the prayer needs
5 and requests of their particular branch. For instance,
6 the legislative branch would maybe ask a prayer for
7 their families for the long hours that they put in,
8 that God would give them wisdom on the decisions that
9 they make, and so they make some comments on their
10 particular branch. And if they want to talk about what
11 prayer has meant in their life, they're free to do
12 that.

13 Then a representative of the National Prayer
14 Committee steps up on the platform and prays for that
15 particular area. For instance, the judge would be
16 standing in the gap for the judicial branch all across
17 our land, and we would pray for all of our people that
18 are involved in the judiciary, including all of you.

19 Q. And it's your testimony today, though, that in
20 inviting representatives of the different branches of
21 government, that you don't also encourage them to speak
22 about the role that religion has played in their
23 lives?

24 A. We ask them -- we suggest that if they would
25 like to speak about prayer, you know, that would be

1 fine.

2 Q. So you don't ask them to, you just suggest it,
3 is that the distinction you're making?

4 A. We suggest it.

5 Q. The activities at the Cannon office building
6 then, are they televised?

7 A. I think the last year was the first time they
8 were televised. I would say not televised. I would
9 say Webcast.

10 Q. And who televised it?

11 A. God TV.

12 Q. What is it called?

13 A. It's called God TV.

14 Q. And who's behind that?

15 A. Again, you would have to ask John Bornschein,
16 who's the administrative director of the National Day
17 of Prayer. I don't even know how big the affiliate
18 is.

19 Q. 2008 was televised, correct? Do you need a
20 break?

21 A. No. I saw you looking over there. I thought
22 someone came in.

23 Q. 2008 was televised, correct?

24 A. I believe so.

25 Q. And then was 2009 also?

1 A. Yes.

2 Q. And do you know whether any effort was made to
3 determine whether or not the broadcast was widely
4 viewed?

5 A. Again, you would have to ask our executive
6 director who handles the production, you know.

7 Q. Is it something that the task force pays
8 for?

9 A. If we're charged, we do. Sometimes they give,
10 you know, free service. But if they charge us, we pay
11 for it.

12 Q. Do you know whether --

13 A. I think God TV gave us the time.

14 Q. Do you pay anything for use of the Cannon
15 office building?

16 A. No.

17 Q. Now, are you aware of any other National Day
18 of Prayer activities that are held in the Cannon office
19 building?

20 A. No. We just have the one prayer service.

21 Q. But, I mean, are you aware of any activities
22 organized and conducted in the Cannon office building
23 by other organizations?

24 A. Well, I know Dr. Corinthia Boone, who handles
25 the Washington, D.C. event, she has some kind of a

1 service for pastors, but I don't know where it's held.
2 I don't know what room it's held in, but it's in the
3 Cannon House office building. I think it serves
4 pastors.

5 Q. How does a person or an organization go about
6 getting access to use the Cannon office building for an
7 activity such as you host?

8 A. We make a request to the Speaker of the House,
9 and they have to approve it.

10 Q. And that's at least since before you became
11 the chairman, that process has been going on,
12 correct?

13 A. Correct.

14 Q. Do you agree or disagree that the President
15 should not promote prayer?

16 MR. ROSENBERG: Objection as to form.

17 A. Can you state the question again?

18 MR. BOLTON: Can you read it back?

19 (The requested question was read back by the
20 reporter.)

21 Q. (BY MR. BOLTON) Let me rephrase it. Do you
22 believe that the President should promote prayer?

23 A. I would like for him to, because he is the
24 leader of the nation. At least on the National Day of
25 Prayer, I would like him to encourage prayer.

1 Q. And would that be true also, then, of
2 Congress?

3 A. Well, Congress already did. They signed in
4 1988 and 1952 that we should have a National Day of
5 Prayer.

6 Q. Now, do you know anything about the history of
7 that 1952 legislative enactment signed by President
8 Eisenhower?

9 A. It was signed by President Truman.

10 Q. I'm sorry.

11 A. No.

12 Q. Do you know whether it had anything to do with
13 being a reaction to the Cold War that was going on and
14 a response to communism?

15 A. I was in high school at that time. I had no
16 knowledge of that.

17 Q. I understand. But you don't have any
18 knowledge of the things that happened in the Bible
19 either, right?

20 A. Some. Well, not the history.

21 Q. Pardon me?

22 A. Not the creation of it, of course.

23 Q. But the fact that you weren't there doesn't
24 mean -- your knowledge is not limited to the things
25 that you actually personally witnessed, correct?

1 A. That's true.

2 Q. But in terms of the history of the 1952
3 enactment, you not only were not there, but you have
4 not subsequently learned anything about the history of
5 that enactment?

6 A. No.

7 Q. And you've described what you know in terms of
8 the enactment in 1988 designating a specific day for
9 the day of prayer, correct?

10 A. Yes.

11 Q. Has the task force, under your guidance, been
12 successful in what it's intended to do?

13 A. Yes.

14 Q. And how do you determine that?

15 A. Well, when I took over the National Day of
16 Prayer, we had a very small coordinator base, and it
17 has grown --

18 Q. Very small what?

19 A. Coordinator base, volunteer base. And it has
20 grown under my leadership. I don't take credit for it.
21 I see it as the blessing of God. I don't take a
22 salary. I volunteer my time, so do all of our
23 coordinators. But the coordinator base has really
24 grown, and there's been more involvement in the
25 National Day of Prayer in our nation.

1 Q. Do you think that the task force has been
2 successful in mobilizing Christians to engage in
3 prayer?

4 A. Yes.

5 Q. And how do you measure that?

6 A. Just by the number of people that are involved
7 in the prayer movement.

8 Q. "In the prayer movement," is that what you
9 said?

10 A. Uh-huh.

11 Q. And when you say "the prayer movement," what
12 do you mean by that?

13 A. Just people that are interested in prayer,
14 people that -- like we have this initiative, the seven
15 centers of power, and we get people ordering bookmarks
16 with the seven centers of power on it and bulletin
17 inserts. So we can just tell from the mail and the
18 phone calls that it's grown.

19 Q. Certainly this success in mobilizing a
20 Christian prayer movement, certainly the task force has
21 been successful, correct?

22 A. Yes.

23 Q. Do you attribute any of that success to the
24 fact that there is a designated day of prayer?

25 A. Yes, because it unifies people of faith. You

1 know, we have students gather around the flagpoles on
2 the National Day of Prayer. Some little children have
3 prayers on that day, and, you know, it's good to have
4 something to -- you know, a central theme or a central
5 event that people can gather around, such as we
6 celebrate a lot of special days in our country.

7 Q. Now, in terms of the activities that are
8 organized by the task force, though, and the volunteers
9 that you engage, my understanding is that those
10 volunteers must subscribe to the Christian-Judeo that
11 the task force adheres to; is that correct?

12 A. That's correct.

13 Q. Has that always been the case?

14 A. Yes.

15 Q. My understanding is that the volunteers have
16 to sign something acknowledging that.

17 A. I'm not aware of that. You would have to ask
18 John Bornschein as an administrative --

19 Q. But certainly a limitation on your volunteer
20 base of people who do subscribe to the Christian-Judeo
21 precepts that the task force believes in, you do
22 understand that to be a requirement, correct?

23 A. Correct. We have a separate 501(c)(3), and we
24 are funded by people of this persuasion. So, of
25 course, we would want our volunteers to be conducting

1 their prayer gatherings, you know, in the same
2 tradition.

3 Q. Now, is the tradition and the beliefs and the
4 expression that is promoted by the task force, does
5 that have any relationship to the Lausanne Covenant?

6 A. Yes.

7 Q. And can you tell me what the Lausanne -- am I
8 pronouncing it right, by the way?

9 A. Uh-huh.

10 Q. Can you tell me what the Lausanne is, as you
11 understand it?

12 A. You would have to ask Mrs. Vonette Bright that
13 question.

14 Q. I would have to ask her what you understand it
15 to be?

16 A. No. What she understood it to be.

17 Q. My question right now, though, is: Do you
18 have an understanding of what the Lausanne Covenant
19 is?

20 A. Not really.

21 Q. It's really nothing that you could describe
22 for me?

23 A. Not really. I know the National Prayer
24 Committee came out of the Lausanne committee meeting,
25 and I believe Billy Graham was there, and I don't know,

1 many different religious leaders. But other than that,
2 I don't know much about it.

3 Q. And is the Lausanne Covenant something that
4 has been adopted by some religious body? In other
5 words, who are the people that signed off on the
6 Lausanne Covenant?

7 A. I don't know. I'm sure Mrs. Bright did, but I
8 don't know of the others. I don't know who attended
9 that conference.

10 Q. Okay. So the Lausanne Covenant, though, is
11 not something that was adopted by any organized
12 religious entity itself?

13 A. Not that I know of.

14 Q. And is it the Lausanne Covenant that the task
15 force subscribes to then?

16 A. I don't know. Since we're a project of the
17 National Prayer Committee, and if they subscribe to it,
18 I assume that we have to be at least on board.

19 Q. The relationship with the Lausanne Covenant to
20 the task force, am I the first person to suggest that
21 there is some relationship to you?

22 A. Yes.

23 Q. You've never heard that relationship expressed
24 before?

25 A. No.

1 Q. But certainly you had heard of the Lausanne
2 Covenant before?

3 A. Yes, I have. I believe it's on our Website.

4 Q. Well, I've tried to read everything on your
5 Website, but I may have missed it.

6 A. I'm not sure, but it may be.

7 Q. Have you selected an annual theme for 2010?

8 A. Not yet.

9 Q. And who will be involved in that selection
10 process? Is that basically something that ultimately
11 you're responsible for?

12 A. Yes.

13 Q. Now, my understanding is that in 2009,
14 President Obama participated much less in any organized
15 National Day of Prayer activities than his
16 predecessors; is that correct?

17 A. That's correct.

18 Q. He was certainly invited to participate --
19 well, did the task force invite him to participate in
20 any activities?

21 MR. ROSENBERG: Objection.

22 A. No. All we asked for from President Obama was
23 for a proclamation. We requested it.

24 Q. (BY MR. BOLTON) Were you disappointed that
25 President Obama engaged in a less visible promotion of

1 the day of prayer after he was elected?
 2 MR. THERIOT: Objection, vague.
 3 A. I was happy with the proclamation that he
 4 wrote.
 5 Q. (BY MR. BOLTON) Okay. But were you unhappy
 6 about anything?
 7 MR. THERIOT: You know, I object because it's
 8 vague. You can answer it, if you know.
 9 Q. (BY MR. BOLTON) I'm not asking about anything,
 10 you know, including the price of produce. My question
 11 was more limited to what we were talking about. We
 12 were talking about President Obama. It may not come as
 13 a surprise to you, but you and your husband were at
 14 least quoted as expressing disappointment in the
 15 President. Are you hearing that for the first time?
 16 A. No.
 17 Q. And did you, in fact, express disappointment
 18 with the President?
 19 A. I never talked to the President, but, of
 20 course, I was disappointed because former presidents
 21 have celebrated the National Day of Prayer in some way.
 22 So I was hoping President Obama would celebrate our
 23 nation's day of prayer in some tangible way.
 24 Q. He did issue the proclamation, though,
 25 correct?

1 A. Yes. It was a good proclamation.
 2 Q. And it encouraged -- whether he was out front
 3 engaged in corporate activities, he certainly
 4 encouraged people to pray in their own way, correct?
 5 A. Correct.
 6 Q. And certainly prayer can be done on an
 7 individual basis without corporate activities,
 8 correct?
 9 A. Of course.
 10 Q. And, in fact, the task force was successful in
 11 mobilizing around the National Day of Prayer
 12 designation even without the President engaging in
 13 activities such as his predecessors had, correct?
 14 A. Correct. The National Day of Prayer doesn't
 15 belong to any one man. It belongs to the American
 16 people.
 17 Q. And central to that, then, is the designation
 18 by the President in the proclamation of the day,
 19 correct?
 20 MR. THERIOT: Objection, vague.
 21 A. (Witness indicating in the affirmative.)
 22 Q. (BY MR. BOLTON) You nodded. Was that a yes?
 23 A. I'm not sure. Can you restate it? I'm not
 24 sure what your question was.
 25 Q. But until you heard the objection --

1 A. No, no. I wasn't clear then.
 2 BY MR. BOLTON: Can you read back the
 3 question?
 4 (The requested question was read back by the
 5 reporter.)
 6 A. Are what you saying is, do I think it's
 7 important that the President sign a proclamation?
 8 Q. (BY MR. BOLTON) Yes.
 9 A. I do.
 10 Q. And why is that?
 11 A. Well, he is the leader of our country, and
 12 many people look to the President as the moral leader
 13 and sometimes even the spiritual leader. And since
 14 this is a day set aside by Congress for the American
 15 people, he's the leader of the American people, we
 16 would like to see him encourage people of all faiths to
 17 pray on that day.
 18 MR. THERIOT: Rich, it's been an hour. Do you
 19 want to take a few minutes?
 20 MR. BOLTON: That's fine.
 21 (A brief break was taken.)
 22 Q. (BY MR. BOLTON) Now, the task force, as we
 23 discussed, has maintained a Website, correct?
 24 A. That's correct.
 25 Q. Am I correct that it's described as the

1 official Website of the National Day of Prayer?
 2 A. I think you'll see National Day of Prayer Task
 3 Force.
 4 Q. Pardon me?
 5 A. I believe it says "National Day of Prayer Task
 6 Force."
 7 Q. And this may be a little bit tedious. What
 8 I'm going to do now is ask you to identify some
 9 documents, and I'll ask a few questions about a number
 10 of them, but more than anything, we're in the process
 11 right now of just identifying and getting a little bit
 12 of description.
 13 MR. BOLTON: Tom, the first document is from
 14 the task force Website, and it discusses their mission
 15 and vision and values that you'll get a copy of with
 16 the transcript, but that's the first document that
 17 we're marking.
 18 MR. BELLAVIA: Thank you.
 19 (Exhibit 1 was marked for identification.)
 20 Q. (BY MR. BOLTON) Exhibit 1 is from the task
 21 force Website; is that correct?
 22 A. Yes.
 23 Q. Have you seen this before?
 24 A. Yes.
 25 Q. And were you involved with the articulation of

1 the mission statement for the task force?
 2 A. No.
 3 Q. Do you know whether that mission statement
 4 came from the National Prayer Committee?
 5 A. I would imagine the National Prayer Committee,
 6 along with maybe members of the task force, put this
 7 together.
 8 Q. Were you involved at all in putting this
 9 together or reviewing it to see if it accurately stated
 10 the task force's position?
 11 A. No.
 12 Q. Have you ever seen it before?
 13 A. Yes.
 14 Q. And, to your knowledge, does it accurately
 15 state the mission and vision and values of the task
 16 force?
 17 A. It does.
 18 Q. Now, the task force Website also includes a
 19 variety of other pages. Have you, to your knowledge,
 20 looked at all of what's on your Website?
 21 A. I haven't, because I'm not a techie. I
 22 usually have to have somebody pull it up for me.
 23 Q. Looking at Exhibit 1, by the way, where it
 24 says -- on the left-hand side, there's some description
 25 of different pages. Do you see that, where it says at

1 Q. That's a good point. Normally what it just
 2 has is the flag and the National Day of Prayer on
 3 different documents, correct?
 4 A. And on different documents, it says -- it has
 5 the flag and National Day of Prayer Task Force.
 6 Q. Okay.
 7 MR. THERIOT: And, incidentally, I want to
 8 object to this document to the extent I don't think
 9 it's clear from the document itself, but the task force
 10 is included in the logo up there.
 11 MR. BOLTON: Pardon me?
 12 MR. THERIOT: The task force is included on
 13 the Website in the logo up there. It's just not
 14 reflected in this document because it's just not a
 15 great copy.
 16 MR. ROSENBERG: It's very faint.
 17 A. It's underneath the flag, I think.
 18 Q. (BY MR. BOLTON) I'm not seeing it, but I will
 19 look. It does say, though, that it is the "National
 20 Day of Prayer Official Website," correct?
 21 A. It is the official Website for the
 22 Judeo-Christian expression of the National Day of
 23 Prayer.
 24 Q. Okay. And, certainly, National Day of Prayer
 25 is in much -- can we agree that it is in much larger

1 the very top, it says, "About NDP"?
 2 A. Yes.
 3 Q. So, certainly, the task force, in its Website,
 4 shortens the description of the entity to just NDP
 5 rather than task force, correct?
 6 A. Well, I think if you look at the entire page,
 7 it alludes to the task force.
 8 Q. Pardon?
 9 A. I think if you look at the entire page --
 10 let's see. Well, if you take the Website in context,
 11 many, many times it says "National Day of Prayer Task
 12 Force."
 13 Q. Okay. But certainly in the description of the
 14 different pages, it's shortened to just NDP, correct?
 15 A. Correct.
 16 Q. And then we discussed the logo. One of the
 17 logos at least, that's shown up in the upper left-hand
 18 corner of Exhibit 1, correct?
 19 A. Correct.
 20 Q. And that's probably the most common logo that
 21 is used by the task force, correct?
 22 A. Correct.
 23 Q. And certainly -- go ahead.
 24 A. Not in its entirety. Our logo doesn't include
 25 "Official Website."

1 type than the reference to the task force?
 2 A. Yes.
 3 Q. In terms of the inclusion of the American flag
 4 on the logo, to you, is the inclusion of the American
 5 flag on the logo, is that significant?
 6 A. I believe it is, because it represents
 7 America.
 8 Q. And so, certainly, there is an attempt then to
 9 associate the National Day of Prayer Official Website
 10 of the task force with this being an American day that
 11 is being honored?
 12 A. It is our nation's day of prayer.
 13 Q. There are other pages on the Website, on the
 14 NDP Task Force website, that discuss such things as
 15 prayer and what makes for effective prayer, correct?
 16 Not on the exhibit that you have, but you're familiar
 17 with the Website, correct?
 18 MR. THERIOT: Objection. She's actually
 19 testified that she's not that familiar with it, is my
 20 understanding.
 21 Q. (BY MR. BOLTON) Okay. I may have
 22 misunderstood. You have viewed or not viewed your
 23 Website?
 24 A. Parts of it.
 25 Q. Are you aware of a page that's entitled "What

1 Makes Prayer Work"?

2 A. I have not seen that page.

3 Q. How about a page entitled "Why We Pray"?

4 A. I have not seen that page.

5 Q. And so if I asked you about them in terms of

6 any personal familiarity with those pages, you would

7 not have any familiarity; is that correct?

8 A. What do you call the first page -- help me out

9 here -- when you open up somebody's Website?

10 MR. THERIOT: Home page.

11 A. The home page I'm familiar with, but not the

12 different links.

13 Q. (BY MR. BOLTON) In terms of "What Makes Prayer

14 Work," though, it begins by saying, "It's all about a

15 relationship," and you would agree with that,

16 correct?

17 A. A relationship with the Holy God.

18 Q. On the page entitled "Why We Pray," there's a

19 statement that it is the goal -- "It's our goal," which

20 would be the task force's goal, "that you, your family

21 and friends would participate in the National Day of

22 Prayer. We pray that the event impacts your life, and

23 that praying for our nation moves from a one-day event

24 to a lifetime endeavor. So join us on the first

25 Thursday of May and pray with conviction that God would

1 A. Yes, I do.

2 Q. Now, my understanding is that, in a variety of

3 contexts, the task force has expressed its position on

4 some moral and political issues; is that correct?

5 MR. ROSENBERG: Objection to form.

6 Q. (BY MR. BOLTON) Has the task force -- with

7 reference to that standard of morality, that would

8 include, for instance, issues such as their views on

9 homosexuality?

10 A. No. We are apolitical.

11 Q. What about -- well, let me back up. What do

12 you mean by "apolitical"?

13 A. We don't get involved in political issues.

14 We're about prayer. We're not about, you know,

15 homosexuality or abortion or any of those issues.

16 Q. So you would say that those are political

17 issues rather than issues that relate to a standard of

18 morality and family values that you associate with the

19 Old and New Testaments?

20 A. Well, they certainly affect the family and I

21 do think they are moral issues, but that has nothing to

22 do with the task force and our job to mobilize

23 prayer.

24 Q. Pardon?

25 A. That has nothing to do with the task force and

1 continue to shed his grace on thee." Is that a

2 statement that you would agree with?

3 A. I would agree with that.

4 Q. There's a page entitled "Definition of

5 Judeo-Christian," and that is included, I assume, as a

6 reference for the orientation of the task force,

7 correct?

8 A. Are you referring still to the Website?

9 Q. Pardon?

10 A. Are you referring to the Website page?

11 Q. This is a definition from a page on your

12 Website.

13 A. I would have to read it.

14 Q. Okay.

15 (Exhibit 2 was marked for identification.)

16 A. I would agree.

17 Q. (BY MR. BOLTON) That is an accurate statement

18 of the orientation of the task force?

19 A. Yes.

20 Q. It states that the task force uses the term,

21 "With reference to the standard of morality and family

22 values which is common to both the Old and New

23 Testaments, and which has over the centuries formed the

24 foundation for ethics and culture in Western society."

25 Do you see that?

1 our job to mobilize prayer.

2 Q. But in terms of the definition of

3 Judeo-Christian that is provided in your Website then,

4 when you say that you use it, "With reference to a

5 standard of morality and family values, which is common

6 to both the Old and New Testaments," my understanding

7 is that that is the expression then, the

8 Christian-Judeo expression, that is forwarded by the

9 task force, correct?

10 A. Your question is vague.

11 Q. Pardon?

12 A. Your question is vague.

13 MR. THERIOT: Objection, question vague. You

14 can ask him to repeat it. I should have objected,

15 you're right.

16 A. Okay. I'm not quite clear.

17 Q. (BY MR. BOLTON) Okay. Well, I'm not sure

18 what -- my understanding is that you provide a

19 definition of Judeo-Christian, which, as I understand,

20 is the expression that is forwarded by the task force

21 in the activities that it engages in, correct?

22 A. I would say that's correct.

23 Q. Pardon?

24 A. I would say that's correct.

25 Q. Okay. And the term "expression of

1 Judeo-Christian precepts" was actually a phrase that I
 2 believe you first used too; is that correct?
 3 A. Correct.
 4 Q. Okay. So when you say "expression of
 5 Judeo-Christian values," I guess I'm not sure what you
 6 mean because, on the one hand, you say that prayer has
 7 nothing to do with any of these things, and yet, on the
 8 other hand, you tell me that it is utilizing
 9 Judeo-Christian expression.
 10 MR. THERIOT: Objection. That
 11 mischaracterizes her testimony.
 12 A. Well, if you read here, it says, "The meaning
 13 of the term like 'Judeo-Christian' depends much on the
 14 intention or the interpretation of the speaker or
 15 writer who uses it. We routinely use it." And then it
 16 goes on to say, you know, reference to that standard of
 17 morality. So Judeo-Christian literally means Old
 18 Testament and New Testament, the God of the Bible, and
 19 so that is our expression.
 20 Q. And the expression being the standard of
 21 morality and family values that is expressed in the Old
 22 and New Testaments?
 23 A. Correct.
 24 Q. And that is the expression that is utilized by
 25 the task force in its NDP-organized activities,

1 correct?
 2 A. I wouldn't say commands it. You know, the Old
 3 Testament scripture says that, I would but men
 4 everywhere would lift up all their hands in prayer." I
 5 think prayer gives strength to the inner man, I believe
 6 it brings God's blessing not only on individuals but on
 7 nations, and I think prayer is very important.
 8 Q. Does it change outcomes?
 9 A. I think it does.
 10 Q. So do you believe that there are outcomes in
 11 our history that have been affected by your view that
 12 we are -- well, do you hold a view that we are
 13 essentially a Christian nation?
 14 MR. THERIOT: Objection, asked and answered.
 15 MR. ROSENBERG: And objection to form.
 16 MR. THERIOT: So it's the last part of the
 17 question that you wanted her to answer, right, the "Do
 18 you agree that we're a Christian nation"?
 19 MR. BOLTON: Right.
 20 A. I agree that we were founded on Christian
 21 principles.
 22 Q. (BY MR. BOLTON) Do you believe that those
 23 Christian values have influenced the course of the
 24 nation's history?
 25 A. I do.

1 correct?
 2 A. You would say the Bible is our handbook.
 3 Q. That's the extent of the expression, of
 4 Judeo-Christian expression?
 5 A. Well, I imagine the Jewish religion has
 6 another expression, and Judeo-Christian is Protestant,
 7 Catholic and Jewish.
 8 Q. Do you believe that there is a need to pray,
 9 that everyone should pray?
 10 A. Well, the last Barna research shows that
 11 88 percent of Americans pray, and 82 believe that
 12 prayer is answered.
 13 Q. So you would say that whether or not there's a
 14 need to pray is a function of the survey, or are you
 15 saying -- I mean, what I want to get at isn't whether
 16 or not most people pray or not. Is it your position
 17 that people should pray, that they need to pray?
 18 A. Yes.
 19 Q. Pardon?
 20 A. Yes.
 21 MR. ROSENBERG: Objection, form. It's a
 22 compound question.
 23 Q. (BY MR. BOLTON) And one of the reasons that
 24 you believe there is a need to pray is because the God
 25 that you believe in commands that his followers pray,

1 Q. In a positive or a negative way?
 2 A. Positive.
 3 Q. And is it your view that if the nation strays
 4 from Christian values, that less favorable outcomes
 5 will occur?
 6 A. I agree.
 7 (Exhibit 3 was marked for identification.)
 8 Q. (BY MR. BOLTON) Mrs. Dobson, we've marked a
 9 document entitled Exhibit 3. Are you familiar with
 10 that document?
 11 A. Yes.
 12 Q. And can you describe it or identify it?
 13 A. It's a letter to the governor.
 14 Q. Now, the letter that we have is dated -- it
 15 shows the date of January 22 of 2009, correct?
 16 A. Correct.
 17 Q. And it says, "Dear Governor," and then it
 18 says, "Last name." This is a form letter that was sent
 19 to all of the governors?
 20 A. Yes.
 21 Q. And it was sent to all of the governors in
 22 anticipation of the 2009 National Day of Prayer; is
 23 that correct?
 24 A. Yes.
 25 Q. And in the first paragraph, at the end of the

1 first paragraph -- and by the way, this is an aside,
 2 this letter would have been signed and went out over
 3 your signature, correct?
 4 A. Correct.
 5 Q. And this would have been sent to all of the
 6 governors?
 7 A. Correct, yes.
 8 Q. The last sentence of the first paragraph makes
 9 reference to "proclaiming reliance on an Almighty God
 10 and calling Americans to come before Him on behalf of
 11 our nation." Is that, at least from the perspective of
 12 the task force, one of the things that you think is
 13 desirable about the National Day of Prayer as
 14 designated by the President that you say, it behooves
 15 us to honor the precedent established by presidents and
 16 leaders, proclaiming reliance on an Almighty God and
 17 calling Americans to come before Him on behalf of our
 18 nation. Is that what you understand the National Day
 19 of Prayer is about?
 20 A. Yes.
 21 Q. And then in the second paragraph toward the
 22 end, you indicate what the NDP task force theme is and
 23 the supporting scripture, correct?
 24 A. Correct.
 25 Q. And then in the next paragraph, you ask the

1 let's see. Let me just finish reading this.
 2 Q. In the third paragraph, it says, "In your role
 3 as a state coordinator."
 4 A. Yes, then it went to the state coordinators.
 5 Q. This is a letter that you would have -- did
 6 you write it?
 7 A. This was written with Master Writers.
 8 Q. And the letter reflects your views, though,
 9 correct?
 10 A. Yes.
 11 Q. In the first paragraph, you indicate that,
 12 "The overwhelming response last year," which would have
 13 been 2008, "was deeply encouraging," and that you
 14 anticipate even greater involvement in 2009; is that
 15 correct?
 16 A. That's correct.
 17 Q. When you say the response last year and the
 18 involvement was great, what do you mean by that?
 19 A. Number of prayer gatherings.
 20 Q. Okay. In the third paragraph of Exhibit 4,
 21 you state, "As in the past, it is critical that we
 22 garner the support of our nation's leaders for our
 23 efforts." Do you see that?
 24 A. I do.
 25 Q. And do you agree with that statement?

1 governors to lend their support through a public
 2 proclamation declaring May 7th, 2009 as the National
 3 Day of Prayer, correct?
 4 A. Correct.
 5 Q. And so certainly the proclamations issued by
 6 the governors, then, as you understand it, are a form
 7 of lending support to the National Day of Prayer and
 8 what it has come to stand for?
 9 A. Lending support in our nation's day of prayer,
 10 yes.
 11 (Exhibit 4 was marked for identification.)
 12 MR. THERIOT: There's not a question pending,
 13 is there?
 14 MR. BOLTON: No.
 15 Q. (BY MR. BOLTON) Have you looked at the
 16 document?
 17 A. I have.
 18 Q. Exhibit 4 is a document that you're familiar
 19 with?
 20 A. Yes.
 21 Q. It's a form letter that you sent out in
 22 January of 2009 to your various state coordinators; is
 23 that correct?
 24 A. I don't know who it went to. I'm sure it went
 25 to the state coordinators, but it also could be --

1 A. I do.
 2 Q. When you say "it is critical," what do you
 3 mean by that?
 4 A. Well, I believe that people look to their
 5 leaders in giving them direction. So I think it's
 6 critical that the leaders do support this nation's day
 7 of prayer because they're role models to their
 8 people.
 9 Q. And so in terms of the overwhelming response
 10 in terms of the number of prayer events that the task
 11 force has been organizing, you would agree, then, that
 12 the proclamations issued by the various public
 13 officials is important to getting the response that
 14 you've been getting?
 15 A. That's not what it was -- it was not meant by
 16 "response" that the governors were signing
 17 proclamations. It just meant that there was more
 18 involvement at the grass-roots level, more response,
 19 more prayer gatherings.
 20 Q. Okay. But in terms of facilitating that
 21 involvement, is there any relationship, then, to the
 22 support of the nation's leaders for your efforts? I
 23 mean, do you get better participation in these events
 24 by getting support from national leaders?
 25 A. No. I think we would have the same support

1 without them.

2 Q. So your view is, if the governors, for

3 instance, issued no proclamations, it would have no

4 effect on the organizing activities of the -- or the

5 mobilizing activities of the task force?

6 A. We would still have prayer gatherings, but I

7 think the people of their state would be very

8 disappointed if they didn't acknowledge the National

9 Day of Prayer in some way.

10 Q. And why do you say that?

11 A. Just from the feedback from our state

12 coordinators, that if a governor doesn't sign a

13 proclamation, that people are disappointed. They hear

14 from their constituents.

15 Q. And in terms of garnering the support of

16 leaders for your efforts, I mean, what is it that -- I

17 mean, is the issuing of a proclamation an example of

18 garnering such support?

19 A. Well, the first Thursday of May is our

20 National Day of Prayer, and, you know, we hope that the

21 leaders of our country will call the nation to prayer.

22 But, again, we can request it, but that's all we can

23 do.

24 Q. And, in fact, when you say that, "It is

25 critical to garner the support" in the next sentence of

1 Q. I see. So when you say you invite the

2 governors to actively participate, most appropriately

3 on the steps of the capitol building, it is so that

4 they can be there when they're being prayed for?

5 A. Correct.

6 Q. And then the next sentence in that paragraph

7 where you say, "In order to maintain your

8 credibility -- and that of the NDP task force" --

9 A. Where is that? Oh, right here. I see it.

10 Q. You say, "It is imperative that such an event

11 involve a well-organized, substantial assembly." Do

12 you see that?

13 A. Yes.

14 Q. And that's because you want the governor to

15 know that the prayer for him is well-organized?

16 (A brief break was taken to reconnect

17 telephone communication with Mr. Bellavia.)

18 Q. (BY MR. BOLTON) What you were telling me,

19 Mrs. Dobson, is that the reason you are seeking the

20 governors' active participation in NDP observances is

21 so that you can pray for the individual governor or

22 government official?

23 A. We always gather around and pray for the

24 governor, if he attends an event. He's always prayed

25 for, and, you know, the state legislature is prayed

1 Exhibit 4, you state that the role of the

2 coordinator -- or part of the role -- is to help in

3 obtaining a written proclamation from the governor of

4 the particular state coordinator's state, correct?

5 A. Uh-huh.

6 Q. In fact, you suggest encouraging a personal

7 visit to the governor's office, correct?

8 A. Yes. If they do not write a proclamation, we

9 ask them to set up an appointment at the governor's

10 office and, you know, request it as a follow-up.

11 Q. And then in Paragraph 4 of Exhibit 4, you urge

12 the state coordinators to invite each governor of their

13 particular state to actively participate in an NDP

14 observance, most appropriately on the steps of the

15 capitol building. Again, the reason for asking for

16 that involvement, and particularly on the steps of the

17 capitol building, is in order to give visibility to the

18 occasion?

19 A. Well, part of our mission statement is that we

20 are trying to mobilize people to pray for their leaders

21 and for America. So when a mayor or a governor decides

22 to participate, we like that because we can pray for

23 them and we can pray for their families and for

24 whatever their needs are. The only reason we would

25 like them to participate is so we can pray for them.

1 for, any leaders in that particular venue are prayed

2 for. They're prayed for when the governor doesn't show

3 up, but it's always nice if he does decide to

4 participate.

5 Q. And you state that in order to maintain the

6 coordinators' credibility and that of the NDP task

7 force, that it's imperative that such an event, one

8 involving the governor, and preferably on the steps of

9 the capitol building, be well-organized and have a

10 substantial assembly?

11 A. Well, we don't want to invite the governor out

12 to two people on the capitol steps. We want to have a

13 good showing.

14 Q. But the fact of the matter is, you do want

15 these public officials to show up and participate in

16 these observances, correct?

17 A. We would like to pray for them.

18 Q. Now, I mean, my understanding is that you also

19 would like these government officials to speak at the

20 occasion also, right?

21 A. That's up to them.

22 Q. Well, I understand it's up to them. My

23 question was: Would you like them to participate by

24 speaking at these observances?

25 A. We would like them to support prayer.

1 Q. And, certainly, that goes beyond just
 2 attending these functions so that they can be prayed
 3 for, right? Attendance at these occasions isn't just
 4 so that they can be an object of prayer, right?
 5 A. We would like for them to speak about the
 6 nation's day of prayer, and then we would like to pray
 7 for them also, but what the governor does at these
 8 events is totally up to them. We can't dictate it. We
 9 can request it only.

10 (Exhibit 5 was marked for identification.)

11 Q. (BY MR. BOLTON) Exhibit 5, Mrs. Dobson, is the
 12 letter that you sent to President Obama this year,
 13 correct?

14 A. Correct.

15 Q. And you requested his support for the National
 16 Day of Prayer, correct?

17 A. Correct.

18 Q. And in the third paragraph of your letter, you
 19 state, "An integral part of this yearly national
 20 observance is the official presidential proclamation
 21 issued by the White House," correct?

22 A. Correct.

23 Q. And in terms of that, in terms of the
 24 observances that you're organizing, that presidential
 25 proclamation, having it in hand, is very important,

1 correct?

2 A. It is, but presidents throughout our history
 3 have called for a National Day of Prayer.

4 Q. And you go on to state that, "In recent years,
 5 the NDP Task Force has worked with the Clinton and Bush
 6 administrations to craft the wording for the
 7 presidential proclamation." And you talked about that
 8 earlier, correct?

9 A. Correct.

10 Q. And, in fact, you apparently sent a proposed
 11 draft of a presidential proclamation to President
 12 Obama, correct?

13 A. Yes.

14 Q. I don't believe I actually received a copy of
 15 the draft proclamation that you sent to the President.

16 A. I can get it for you.

17 Q. Pardon?

18 A. I can get it for you.

19 Q. Let me ask, not having seen it, would I be on
 20 pretty solid ground guessing that it includes some
 21 reference to this year's theme and the supporting
 22 scripture?

23 A. As I said earlier, our letters that go out
 24 around the National Day of Prayer always state the
 25 theme and the supporting scripture.

1 Q. The letters like this one that you sent to
 2 President Obama?

3 A. It always includes the theme and the
 4 supporting scripture.

5 Q. But you also indicated that you're not
 6 really -- that you make no effort to persuade or push
 7 government officials to include the annual theme and
 8 the supporting scripture in their own proclamation,
 9 correct?

10 A. Correct.

11 Q. What I'm getting at is, the draft of the
 12 proclamation that you sent to President Obama, that is
 13 the draft that, if you had your druthers, he would use,
 14 right?

15 A. It's to really help the writers. If they
 16 don't have to craft a proclamation for the President,
 17 this is just one they can look at, and it makes it
 18 easier for them.

19 Q. Sure. And not having seen it, what I was
 20 speculating, though, is this form that you sent to the
 21 President, did it include this year's theme and
 22 supporting scripture?

23 A. I don't know. I have to look at that.

24 Q. And you said that that's something that you
 25 could lay your hands on fairly readily?

1 A. Yes.

2 MR. ROSENBERG: Rich, I actually think I have
 3 a copy, if that's helpful.

4 MR. BOLTON: Oh, good.

5 (Exhibit 6 was marked for identification.)

6 MR. ROSENBERG: Just to be clear, this was a
 7 document that was produced by Mrs. Dobson. I don't
 8 want to make any representations as to the document.

9 Q. (BY MR. BOLTON) So Exhibit 6, then, is the
 10 letter and the proposed proclamation; is that
 11 correct?

12 A. Yes. The top sheet is requesting a
 13 proclamation, and the second one is his actual
 14 proclamation.

15 Q. And I'm just looking at it. It doesn't look
 16 like you included the annual theme in this particular
 17 proclamation; is that correct?

18 MR. THERIOT: He's asking about -- I think we
 19 need to clear something up. My understanding is,
 20 you're testifying that this is not your proposed
 21 proclamation.

22 THE WITNESS: No, no. They didn't use
 23 anything that we sent.

24 Q. (BY MR. BOLTON) Say that again.

25 A. President Obama's team did not use any part of

1 the draft that we sent them. This is his actual
 2 proclamation.
 3 Q. Oh, okay. Okay. I see.
 4 MR. ROSENBERG: Maybe we should go off the
 5 record for a second.
 6 (An off-the-record discussion was held.)
 7 Q. (BY MR. BOLTON) Is it fair to say,
 8 Mrs. Dobson, that whether or not the second page to
 9 Exhibit 6 was the actual draft proclamation that you
 10 sent to President Obama, you just don't know?
 11 A. I don't know.
 12 Q. Okay. You've got Exhibit 6 right in front of
 13 you, though?
 14 A. I do.
 15 Q. In the third paragraph of the letter that you
 16 wrote to President Obama, and that would be the first
 17 page of Exhibit 6 -- or Exhibit 5 that we were just
 18 looking at, this, though, was a letter that you
 19 actually did send to the President, correct?
 20 A. Yes.
 21 Q. And what you're proposing to do there was what
 22 you had done in recent years with the Clinton and Bush
 23 administrations in terms of helping to craft the
 24 wording of the presidential proclamation?
 25 A. We sent them a draft, yes.

1 correct?
 2 A. Yes.
 3 Q. And presumably at the time that you wrote this
 4 letter, you intended to be accurate in the information
 5 that you were conveying to the President, correct?
 6 A. That's correct. But, again, I worked with
 7 Master Writers on crafting these letters, and they
 8 usually do the background check on it. So if it says
 9 Clinton, then we probably did send a draft.
 10 Q. So the facts stated in this letter, there was
 11 some effort to actually verify the accuracy of the
 12 statements?
 13 A. They usually did a background check.
 14 Q. In a letter that you wrote to Representative
 15 Michael Bachmann --
 16 A. Michele Bachmann.
 17 Q. I'm sorry. Michele Bachmann, that's somebody
 18 that you know, correct?
 19 A. I do know her.
 20 Q. And she's worked with you -- she's attended
 21 National Day of Prayer activities in D.C. in the
 22 past?
 23 A. The Cannon House office building is open to
 24 our representatives to drop in and have prayer if they
 25 choose, and Michele Bachmann has dropped in from time

1 MR. ROSENBERG: Objection as to which Bush
 2 administration. Also, compound for Clinton and Bush.
 3 MR. BOLTON: Say that again.
 4 MR. ROSENBERG: Objection because you referred
 5 to the Bush administration. Which Bush administration?
 6 And compound as to Bush and Clinton. I'm not sure we
 7 ever established what role, if any, the National Day of
 8 Prayer Task Force played regarding the Clinton
 9 administration.
 10 Q. (BY MR. BOLTON) Well, in the letter that we're
 11 looking at there that you wrote to President Obama, you
 12 wrote that, "In recent years, the NDP Task Force has
 13 worked with the Clinton and Bush administrations to
 14 draft the wording for the presidential proclamation."
 15 You wrote that, correct, in the third paragraph?
 16 A. Let me see. Correct.
 17 Q. And that was a correct statement?
 18 A. If by sending a draft means craft, yes.
 19 Q. And that would have been true for -- I mean,
 20 I'm not saying that they adopted it or anything, but
 21 you sent drafts to both the Clinton administration and
 22 the Bush administration, correct?
 23 A. We have to the Bush administrations. I don't
 24 remember if we did to Clinton or not.
 25 Q. But you wrote to President Obama that you had,

1 to time in the prayer service.
 2 (Exhibit 7 was marked for identification.)
 3 Q. (BY MR. BOLTON) Exhibit 7 is the letter that
 4 you wrote to Representative Bachmann?
 5 A. Yes.
 6 Q. And, again, you thank her for agreeing to
 7 participate in the NDP observance in 2009, correct?
 8 A. As stated before, we asked for a
 9 representative from the judicial, the legislature, the
 10 executive branch, and the military, and we asked her to
 11 represent the legislature.
 12 Q. And in your letter to her, you include a
 13 reference to the 2009 theme and supporting scripture,
 14 correct?
 15 A. In all of our letters that go out for the
 16 National Day of Prayer, we put the theme and the
 17 supporting scripture on it.
 18 Q. And then you state, "There is certainly no
 19 better time than now to point Americans to the eternal
 20 source of encouragement and help," and that would be
 21 the God of your Bible, correct?
 22 A. The God of the Bible, yes.
 23 Q. And is it your understanding that this year's
 24 theme and supporting scripture, that that is how you
 25 understand or how you intended that theme and

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1 supporting scripture to be interpreted, as an effort to
 2 point Americans to the eternal source of encouragement
 3 and help?
 4 A. Yes.
 5 Q. Pardon?
 6 A. Yes.
 7 Q. On Page 2 of the letter to Representative
 8 Bachmann, you give a little bit of guidance in terms of
 9 preparing the message that she would be asked -- as a
 10 representative of the House of Representatives, she
 11 would be a speaker at the Cannon office building?
 12 A. Yes.
 13 Q. Now, earlier you indicated to me that you
 14 didn't ask speakers to describe the role of prayer in
 15 their lives, but at least in this particular letter,
 16 you did ask that she briefly describe how prayer has
 17 played a valuable role in her personal and professional
 18 life, correct?
 19 A. Correct.
 20 Q. And that's language that you include in a lot
 21 of these letters to people that are being invited to
 22 participate, correct?
 23 A. It depends. I know Michele Bachmann
 24 personally, I know that she has a deep faith in God, I
 25 know that she prays, and so she was asked to share

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1 that, if she chose to.
 2 Q. Have you ever had a speaker at the Cannon
 3 office building function representing any of the
 4 branches of government that you knew did not have any
 5 particular religious bent?
 6 A. Most of the people that we invite, we know
 7 that they are people of faith.
 8 Q. And, in fact, that's, quite frankly, one of
 9 the characteristics that you seek in speakers at the
 10 Cannon office building activities, correct?
 11 A. Correct.
 12 (Exhibit 8 was marked for identification.)
 13 Q. (BY MR. BOLTON) Exhibit 8, I'm guessing you
 14 may not have ever seen before, or have you?
 15 A. Let me see. Let me just take a moment. I
 16 have seen this.
 17 Q. You have, okay. And what is it?
 18 A. Anne Ryun is former Congressman Jim Ryun's
 19 wife, and she was the hostess that helped seat people
 20 at the Cannon House office building along with other
 21 congressional wives.
 22 Q. She doesn't have any official relationship
 23 with the task force, correct?
 24 A. No. Volunteer.
 25 Q. And she's kind of on this postCannon activity

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1 recount, correct?
 2 A. Correct.
 3 Q. And she says that, by her count, twice as many
 4 congressmen attended this year's event than for the
 5 last 12 years that she's been involved.
 6 A. Yes.
 7 Q. And this was the 2009 prayer day activity,
 8 correct?
 9 A. Yes.
 10 Q. And the next couple of pages in, there's some
 11 list. Do you understand that this is the list of the
 12 congressmen that attended the Cannon office building?
 13 A. Yes.
 14 Q. And she lists the names of the individuals
 15 that attended and gives their -- it look like she's
 16 giving, for most of them at least, their Washington,
 17 D.C. official office address, correct?
 18 A. Yes.
 19 Q. And then she indicates in a parentheses by
 20 each name, it looks like an R followed by a state
 21 abbreviation. The R, I assume, reflects the party
 22 affiliation of the attendees; is that correct?
 23 A. Yes.
 24 Q. It looks like participation in the Cannon
 25 office building -- or attendance at the Cannon office

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1 building function is primarily a Republican-dominated
 2 event. Is that typical?
 3 A. I would say we have more Republican
 4 congressmen attending than Democrat. Maybe that says
 5 something about their prayer life.
 6 Q. About what?
 7 A. Maybe that says something about their prayer
 8 life.
 9 Q. I'm missing the last part of it. I'm missing
 10 the punch line.
 11 A. I said, jokingly, maybe that says something
 12 about their prayer life.
 13 Q. Oh, yeah, yeah. Well, you should ask them,
 14 send them that in next year's letter.
 15 A. I would like to say that Democrats -- all
 16 Democrats and Republicans are invited. We send out
 17 letters of invitation to all of them.
 18 (Exhibit 9 was marked for identification.)
 19 Q. (BY MR. BOLTON) Exhibit 9 is a letter by you
 20 written in August of 2008 to Father Daniel Coughlin; is
 21 that correct?
 22 A. Correct.
 23 Q. And he's the chaplain for the House of
 24 Representatives?
 25 A. Yes, he is.

1 Q. And he, apparently, participated in the 2008
 2 activities at the Cannon office building?
 3 A. Yes.
 4 Q. Had he previously participated, or was this
 5 the first year that he actively participated?
 6 A. He's participated before.
 7 Q. In the second paragraph of your letter to
 8 Father Coughlin, you comment that, basically, work
 9 never stops, you're working on the '09 observance
 10 already, and you tell him what the prayer theme will be
 11 and the supporting scripture. And then you indicate,
 12 in the last sentence of the paragraph, that the theme
 13 for '09 reflects your "conviction that hope for the
 14 future is found only through God's mercy and provision
 15 as his people humble themselves before His throne." Do
 16 you see that?
 17 A. Yes.
 18 Q. You were sincerely indicating to him how you
 19 understand the theme for '09, you know, how at least
 20 you interpret it and why you chose that theme?
 21 A. Yes.
 22 Q. Condoleezza Rice, did she participate in the
 23 2008 activities?
 24 A. She was invited but couldn't participate. She
 25 was out of the country.

1 either the Dirksen building --
 2 Q. Who asked you to do that?
 3 A. I said the precedent for being in the
 4 government building in Washington, D.C. was set by
 5 Vonette Bright when she was chairman. And so when I
 6 took over, we just continued that tradition.
 7 Q. But you agree with that tradition?
 8 A. I do.
 9 (Exhibit 10 was marked for identification.)
 10 Q. (BY MR. BOLTON) Exhibit 11, is that the
 11 exhibit you're looking at right now?
 12 A. Yes.
 13 MR. ROSENBERG: Was 10 the Condoleezza Rice
 14 letter? The last one I had was 9.
 15 MR. THERIOT: You have actually never
 16 proffered Condoleezza Rice.
 17 MR. BOLTON: Did I mark it? Which one are you
 18 missing?
 19 MR. ROSENBERG: The last one I have is
 20 Coughlin.
 21 MR. BOLTON: 10 was -- yeah, I forgot. Just
 22 for our record, why don't you go ahead and just
 23 identify 10.
 24 Q. (BY MR. BOLTON) We've talked about it, but
 25 Exhibit 10 is the letter to Father Coughlin, correct?

1 Q. In the letter to her relating to the '08
 2 observance, you stated that the Cannon office building
 3 event is symbolic of thousands of others taking place
 4 throughout the country. Is that one of the reasons for
 5 holding it in the Cannon office building in terms of
 6 the symbolism?
 7 A. No. As I said, the event at the Cannon office
 8 building is not any more important than the other
 9 events across the nation. The reason we hold it there
 10 is because it is the seat of our government, and we're
 11 there to pray for our government.
 12 Q. And so for that reason, it's certainly
 13 preferable, from your perspective, to have it in the
 14 Cannon office building than, for instance, in a hotel
 15 conference room or something like you -- you said the
 16 night before, you have an event which is more of a
 17 social event, as I understand it, correct?
 18 A. Right.
 19 Q. But in terms of the actual observance, the
 20 preference would be to have it in a government building
 21 reflecting the seat of our government rather than in
 22 some other sort of conference facility?
 23 A. Well, when I took over as chairman, the
 24 precedent had already been set by Vonette Bright to
 25 hold the National Day of Prayer in Washington, D.C. at

1 MR. ROSENBERG: 9 is Coughlin.
 2 MR. THERIOT: Coughlin is 9, and this says
 3 Father Coughlin too.
 4 MR. BOLTON: Then I just erred. So,
 5 sequentially then, right now we're missing 10, correct?
 6 MR. THERIOT: Correct.
 7 MR. BOLTON: And the exhibit that you have
 8 right now marked as Exhibit 11, that's the letter to
 9 Mark McIntyre?
 10 MR. THERIOT: Right.
 11 MR. BOLTON: Mike McIntyre.
 12 MR. THERIOT: So you're going to remark this
 13 one?
 14 MR. BOLTON: Why don't we. So 10 is going to
 15 be the McIntyre letter.
 16 Q. (BY MR. BOLTON) Exhibit 10, then, is the
 17 letter that you wrote to Representative Mike McIntyre,
 18 correct?
 19 A. Correct.
 20 Q. And this was before the 2008 observance of the
 21 National Day of Prayer, correct?
 22 A. Yes.
 23 Q. And Representative McIntyre represented the
 24 House of Representatives then?
 25 A. The legislature, yes.

1 Q. Had he participated in the past,
 2 Representative McIntyre?
 3 A. Yes.
 4 Q. And how had he been selected for participation
 5 in the past?
 6 A. We try to make it fair. We choose a Democrat
 7 to represent the legislature one year and a Republican
 8 the next year. So he was our Democratic
 9 representative.
 10 Q. And then in the second paragraph, you asked
 11 him also to include a brief description of the
 12 significant role prayer has played in his personal and
 13 professional life, correct?
 14 A. Yes.
 15 Q. That actually seems to be fairly typical in
 16 the letters that you write to these individuals.
 17 A. Well, it is a prayer service.
 18 Q. Pardon?
 19 A. It is a prayer service. And so when they come
 20 over, we like for them to reference prayer in their
 21 life. They don't have to, but it is a prayer service.
 22 It's about prayer.
 23 Q. And the only reason I was making a point of it
 24 was because when we talked about that without reference
 25 to the letters, you had not recalled that you actually

1 asked people to reflect upon or comment upon the role
 2 that religion played in their personal lives. That was
 3 the only reason why I drew attention to this.
 4 A. Well, I don't think every letter says that,
 5 but some do, and the ones that you've brought have.
 6 Q. Did you know with regard to Condoleezza Rice
 7 whether or not religion had played a -- or prayer had
 8 played a significant role in her personal and
 9 professional life?
 10 A. My understanding of her history is that she
 11 came from a very religious family.
 12 Q. And the reason I ask is because the same
 13 language that we've been talking about is included in
 14 the letter that you wrote to her. When you say it's
 15 included in some letters, I must say, I haven't sen
 16 letters that didn't include that language in terms of
 17 the presenters that you anticipated -- or the speakers
 18 at the observances. That would make sense because, as
 19 you said, this is a prayer service.
 20 A. It is.
 21 MR. ROSENBERG: Objection. I don't know that
 22 there was a question there.
 23 MR. BOLTON: Now, if I have these
 24 sequentially, is 11 next?
 25 MR. THERIOT: Yes, 11 should be next.

1 (Exhibit 11 was marked for identification.)
 2 Q. (BY MR. BOLTON) Now, Exhibit 11, then, is the
 3 letter that you wrote to Chaplain Barry Black, the
 4 Senate chaplain, in March of 2008, correct?
 5 A. Correct.
 6 Q. And that year the Senate chaplain participated
 7 in your observance; is that correct?
 8 A. Correct.
 9 Q. Had he participated previously in any of your
 10 observances?
 11 A. As a courtesy to both chaplain of the House
 12 and the chaplain of the Senate, we alternate. One year
 13 the chaplain of the House, one year the chaplain of the
 14 Senate. So this was his year.
 15 Q. In the letter that you write to him in Exhibit
 16 11, you're inviting him to participate -- actually it
 17 looks like he's already agreed to participate, and you
 18 acknowledge that you're delighted that he will be
 19 joining you again "to lead a time of intercession
 20 during our Capitol Hill NDP observance on May 1, 2008."
 21 What do you mean by that, "lead a time of
 22 intercession"?
 23 A. Well, intercession is just praying.
 24 Q. Pardon?
 25 A. Intercession is just praying.

1 Q. Okay.
 2 A. When you're interceding, you're praying.
 3 Q. Okay. And then in the last paragraph of the
 4 letter, you thank Chaplain Black for "demonstrating an
 5 ongoing deep commitment to lifting our land and its
 6 people before the Almighty and encouraging others to do
 7 so." What did you mean by that?
 8 A. He is the chaplain of the Senate. He is their
 9 pastor. And he does have a deep commitment to praying
 10 for those senators and their families and praying for
 11 the land. So this is just kind of restating what I
 12 know his heart is.
 13 Q. And his participation in the NDP Task Force
 14 observance in the Cannon office building, would that be
 15 a continuation of that, that participating in a prayer
 16 service, would you construe that to be encouragement
 17 for others?
 18 MR. THERIOT: Objection, vague.
 19 A. Well, they are the religious leaders for the
 20 Senate and the House. So I would say that would be an
 21 encouragement for them to participate.
 22 Q. (BY MR. BOLTON) Including his participation in
 23 the Cannon office building?
 24 A. That's what I'm talking about.
 25 MR. THERIOT: Whenever you're ready, it's

1 12:30.
 2 MR. BOLTON: Is now a good time to take a
 3 break then?
 4 MR. THERIOT: Sure.
 5 MR. BOLTON: And then I'll organize. We won't
 6 be a whole lot longer.
 7 MR. THERIOT: Okay. Great.
 8 (A lunch break was taken from 12:27 p.m. until
 9 1:12 p.m.)
 10 Q. (BY MR. BOLTON) Mrs. Dobson, my understanding
 11 is that, at least in the last few years, most of the
 12 governors are incorporating the task force theme and
 13 supporting scripture in their own proclamations. Do
 14 you have any explanation for why that is?
 15 MR. THERIOT: Objection, assumes facts not
 16 established.
 17 A. I don't know why they would include it. I
 18 don't know.
 19 Q. (BY MR. BOLTON) Who is the intended audience
 20 of these various proclamations?
 21 A. To the people of the state.
 22 Q. Or in the case of the President?
 23 A. The people of the nation.
 24 Q. The annual theme and supporting scripture that
 25 you utilized this year, is there any effort made by the

1 gatherings. And then you go on to say, "In addition,
 2 we plan to release it to the media the week preceding
 3 May 1st."
 4 First of all, you make reference to 40,000
 5 volunteer coordinators. To the best of your knowledge,
 6 that was an accurate number at least at the time of
 7 this letter?
 8 A. Yes.
 9 Q. And you indicate that those coordinators will
 10 be reading the President's proclamation underscoring
 11 the need for corporate and personal intercession. And
 12 my understanding from when we talked this morning, that
 13 means underscoring the need for group and personal
 14 prayer basically?
 15 A. Correct.
 16 (Exhibit 13 was marked for identification.)
 17 Q. (BY MR. BOLTON) Exhibit 13 is an earlier
 18 letter. Again, it looks to me like it's a form, the
 19 template that you used to write to the governors in
 20 2006 in anticipation of that year's National Day of
 21 Prayer, correct?
 22 A. Correct.
 23 Q. And this is a letter that you would have sent
 24 to each of the governors, correct?
 25 A. That's right.

1 task force to conceal its Judeo-Christian
 2 orientation?
 3 A. No.
 4 Q. In other words, at least to you, the annual
 5 theme and supporting scripture would be readily
 6 recognized, at least by your constituency, as coming
 7 from that Judeo-Christian background?
 8 A. Yes.
 9 (Exhibit 12 was marked for identification.)
 10 Q. (BY MR. BOLTON) Mrs. Dobson, we marked and I
 11 presented to you Exhibit 12, and that's the letter that
 12 you wrote to President Bush in anticipation of the 2008
 13 National Day of Prayer; is that correct?
 14 A. Yes.
 15 Q. And, again, in the third paragraph, it
 16 indicates that you provided the President with a draft
 17 of a proclamation, correct?
 18 A. Yes.
 19 Q. And then it goes on to say, in the same
 20 paragraph, the third paragraph of Exhibit 12, that you
 21 state that your 40,000 volunteer coordinators will be
 22 reading the proclamation at their events, and that the
 23 President's declaration underscoring the need for
 24 corporate and personal intercession will lend
 25 tremendous prestige and credibility to these

1 Q. In the second paragraph, you state that you
 2 are convinced that the theme for this year, the 2006
 3 observance, and the theme was America Honor God, "will
 4 serve as a valuable reminder that the Lord is at work
 5 in this great land and is deserving of veneration and
 6 absolute trust." Do you think that that message is
 7 somehow conveyed by the theme itself?
 8 A. Well, when I say that it will serve as a
 9 valuable reminder, I'm not saying that to the governor.
 10 I'm saying that it will serve as a valuable reminder to
 11 the nation that the Lord is at work in our great
 12 land.
 13 Q. Okay. The theme does?
 14 A. Yes.
 15 Q. Later in that same paragraph, the second
 16 paragraph of Exhibit 13, you write to the different
 17 governors that with their support, "We can further our
 18 efforts to call the nation to prayer, acknowledging our
 19 Creator, and asking for guidance and protection on
 20 behalf of our families, our government, and our Armed
 21 Forces." Do you see that language?
 22 A. I do.
 23 Q. And when you say that with the governor's
 24 support "we can further that effort," the support that
 25 you're asking for there is in the form of signing and

1 issuing a proclamation. Am I reading that correctly?
 2 A. That's right.
 3 Q. And then when you say with that support, "we
 4 can further our efforts," now, the "we" there, is that
 5 a corporate we, is that a task force we, or is that a
 6 broader we, meaning the task force and your
 7 constituency as well as the government leaders that
 8 you're writing to?
 9 A. I would say the task force at the grass-roots
 10 level, the people at the grass-roots -- the National
 11 Day of Prayer is really a grass-roots level, they're
 12 the ones that do all the work out there. They put the
 13 events together. And so that is what is meant by that,
 14 our task force as well as those that work at the
 15 grass-roots level.
 16 Q. Were you involved in any sort of planning or
 17 conceptualizing on how the task force could turn the
 18 National Day of Prayer into a call to the nation to
 19 embrace prayer? Was that something that you undertook,
 20 as a task force, to try and turn the National Day of
 21 Prayer into, or was it something that was already there
 22 that you took advantage of?
 23 MR. ROSENBERG: Objection as to form.
 24 A. Mrs. Vonette Bright was the chairman for eight
 25 years before me, and things were already, you know --

1 in other words, I just took over the baton from her,
 2 and the groundwork was already laid pretty much by her,
 3 and I just built on it.
 4 Q. (BY MR. BOLTON) Did you understand that you
 5 were trying to -- I mean, you're saying Mrs. Bright had
 6 been the chairman I think you said?
 7 A. For eight years.
 8 Q. And I'm sure of the math there. My
 9 understanding is that the task force was created in
 10 1988 and that you became a cochair in 1989.
 11 A. All I know is that Vonette told me that she
 12 had been chair for eight years.
 13 Q. Who is Mrs. Bright? I confess that I don't
 14 know her background or the name.
 15 A. Well, they have a ministry, and she's the
 16 cofounder with her husband, Dr. Bill Bright. They have
 17 a ministry called Campus Crusade for Christ, and it's a
 18 campus ministry at universities, Bible studies and
 19 support groups, and she's also a member of the National
 20 Prayer Committee, and she was also at the Lausanne
 21 Covenant meeting.
 22 Q. Do you understand that by this point in time,
 23 the National Day of Prayer has become a call to the
 24 nation to prayer?
 25 MR. THERIOT: Objection, vague.

1 MR. ROSENBERG: Objection.
 2 MR. THERIOT: Are you talking about now or the
 3 date of the exhibit?
 4 MR. BOLTON: Now.
 5 A. Can you repeat the question?
 6 MR. BOLTON: Can you read it back?
 7 (The requested question was read back by the
 8 reporter.)
 9 MR. ROSENBERG: And I just want to object both
 10 on form and assumes facts not in evidence.
 11 MR. BOLTON: I have actually never known that
 12 to be a deposition objection.
 13 Q. (BY MR. BOLTON) Can you answer the question?
 14 A. National Day of Prayer is put -- is on many of
 15 our calendars in America, and so it is known as a day,
 16 you know, for people to come together to pray or to
 17 pray in their homes, wherever they are, in their car
 18 with a cup of coffee going to work, but it is a day to
 19 remember our nation, our families, our military in
 20 corporate prayer and individual prayer.
 21 Q. What would be lost, in your view, if the
 22 National Day of Prayer was simply a designated day but
 23 it was not an occasion for corporate prayer but merely
 24 personal prayer and reflection?
 25 A. I think we would lose a great blessing on our

1 land. I think it's wonderful to have a day to remind
 2 people the need to pray for America, for those that
 3 lead us to ask for God's continued blessing and
 4 protection on our land and to ask for wisdom and
 5 guidance for those that lead us.
 6 Q. Now, the National Day of Prayer Task Force has
 7 become the subject of some criticism by some groups
 8 that are not your constituency. Is that true?
 9 A. Yes.
 10 Q. And the criticism is that -- and you may have
 11 seen this term used -- the National Day of Prayer has
 12 been hijacked by groups like your own. Have you seen
 13 or heard of that, that particular phrasing?
 14 A. Yes, I've seen it in the newspaper.
 15 Q. In terms of the appearance of the National Day
 16 of Prayer as a Judeo-Christian celebration, can you
 17 understand why that would be divisive to groups that
 18 don't share your views?
 19 MR. THERIOT: Objection, calls for
 20 speculation.
 21 A. I think National Day of Prayer is probably
 22 the -- National Day of Prayer Task Force expression of
 23 the National Day of Prayer is probably the best
 24 organized and the largest, and, therefore, that's how
 25 we're seen. But, as I said before, any faith can have

1 their own task force, can celebrate the National Day of
 2 Prayer, and can grow their movement just like we
 3 have.
 4 Q. (BY MR. BOLTON) And for those that are upset,
 5 they should simply do a better job of organizing, is
 6 that really the response that you would make to them?
 7 A. I would just remind them that this day belongs
 8 to all Americans and we are a privately owned and
 9 funded 501(c)(3), and, therefore, we can express it
 10 however we decide to.

11 Q. But there is a sense in which the official
 12 celebrations and observances of the day of prayer have
 13 become -- have a distinct Christian flavor.

14 MR. THERIOT: Objection, assumes facts not in
 15 evidence -- or not established is the proper
 16 objection.

17 MR. BOLTON: I'm not actually sure that I have
 18 to prove anything in a deposition. Can you read the
 19 question back to the witness?

20 (The requested question was read back by the
 21 reporter.)

22 MR. THERIOT: Same objection.

23 A. Some would see it that way.

24 Q. (BY MR. BOLTON) And at least for those that
 25 see it that way and may not be of a Judeo-Christian

1 orientation, can you understand then, whether correctly
 2 or not, why they would be upset about how the National
 3 Day of Prayer is being celebrated?

4 MR. THERIOT: Objection, calls for
 5 speculation.

6 A. I don't know how they would see it.

7 Q. (BY MR. BOLTON) Pardon?

8 A. I don't know how they would see it.

9 Q. You're certainly aware, though, of the
 10 controversy and the use of the word "hijacking" in
 11 terms of the day of prayer, correct?

12 A. When I have seen that in the newspaper, it has
 13 usually been a quote by Barry Lynn.

14 Q. I know Mr. Lynn.

15 A. So I see it in that context. I think he was
 16 the first one that used that.

17 Q. Have you heard of the group Jews on First?

18 A. Yes.

19 Q. I think they may actually have been the ones
 20 that used the hijacking language first.

21 A. Well, I've seen it in the paper as quoted by
 22 Barry Lynn, but you could be right.

23 Q. But in any event, what do you think causes
 24 this reaction against the National Day of Prayer as
 25 it's been celebrated?

1 MR. THERIOT: Objection, speculation.

2 A. I see it as harassment.

3 Q. (BY MR. BOLTON) Pardon?

4 A. I see it as harassment.

5 Q. So these organizations and groups that have a
 6 problem are harassing groups like your own?

7 A. In the way they speak, I think it's
 8 harassment. None of them offer a solution or an option
 9 to the National Day of Prayer. I mean, they just
 10 object to it.

11 Q. And as you understand the day of prayer then,
 12 I mean, you may be better organized than other groups,
 13 but that that opportunity is available to any group
 14 that wants to celebrate and promote prayer?

15 A. Absolutely.

16 Q. What about people who are nonbelievers?

17 A. Well, there was a group in Oklahoma that I
 18 think it was Atheists Against the National Day of
 19 Prayer, so they had a celebration on the National Day
 20 of Prayer. So anyone can do whatever they want. We're
 21 just expressing it from our constituent base and what
 22 we believe.

23 Q. But you could have a celebration promoting
 24 prayer without there being a National Day of Prayer,
 25 correct?

1 A. Yes.

2 Q. In which case you would be in the same boat as
 3 the Atheist group in Oklahoma, correct?

4 MR. THERIOT: Objection, vague.

5 A. No.

6 Q. (BY MR. BOLTON) I mean, there is a distinction
 7 between having your own celebration without a
 8 presidential endorsement and having your observances
 9 with a presidential endorsement?

10 MR. THERIOT: Objection, assumes facts not
 11 established. Presidential endorsement -- "endorsement"
 12 is a legal term of art. There's been no concession
 13 that the President has endorsed the National Day of
 14 Prayer.

15 MR. BOLTON: I understand the objection,
 16 failure to prove a fact. It's a deposition that we're
 17 conducting.

18 MR. THERIOT: I understand, but you're
 19 assuming facts that haven't been established. You're
 20 assuming, for instance, that the National Day of Prayer
 21 endorses prayer. That's a legal term of art. I'm not
 22 going to let that go without objecting, but she can
 23 answer to the extent that she knows.

24 A. Could you restate the question?

25 (The requested question was read back by the

1 reporter.)
 2 A. Well, as my lawyer said, the President doesn't
 3 endorse the National Day of Prayer. He may support it,
 4 but officially he doesn't endorse it. We encourage
 5 prayer 365 days of the year, not just on the National
 6 Day of Prayer. That is just a rallying -- sort of a
 7 rallying day that is targeted to praying more for our
 8 government and its leaders, for our military, and for
 9 the people of this country. Did I answer your
 10 question?

11 Q. (BY MR. BOLTON) Well, it still seems to me
 12 that the National Day of Prayer is a hard one -- I
 13 mean, you say that it's certainly recognizable for
 14 whatever religion you may believe in, but it still
 15 seems like it's a hard sell for an unbeliever, that
 16 somehow this day has something for them.

17 MR. ROSENBERG: Objection.

18 MR. THERIOT: Objection. It's not in the form
 19 of a question.

20 Q. (BY MR. BOLTON) Would you agree that that
 21 sounds like kind of a hard sell?

22 A. I'm not clear on the question. Maybe I'm
 23 getting tired.

24 Q. Certainly the National Day of Prayer is not
 25 intended to -- I mean, it is intended to acknowledge

1 religion, you would agree with that much at least,
 2 right?

3 A. The National Day of Prayer is set aside for
 4 people to pray, and they cannot pray or they can pray.
 5 It's totally up to them. It's a day that's been given
 6 to us by our Congress. It's a day we can celebrate it
 7 or not celebrate it. There are millions of people that
 8 don't celebrate the National Day of Prayer. They don't
 9 pray on that day or maybe any other day. I don't know.

10 (Exhibit 14 was marked for identification.)

11 Q. (BY MR. BOLTON) Exhibit 14 is a letter that
 12 you wrote to Secretary of Education Paige back in 2004;
 13 is that correct?

14 A. Correct.

15 Q. And he represented the executive branch in the
 16 '04 Cannon office building observance; is that
 17 correct?

18 A. That's correct.

19 Q. And in the second paragraph, you state that,
 20 "Foundational to our country has been the understanding
 21 that God," God with a capital G, "is the Source," and
 22 source also with a capital letter, "of freedom and has
 23 given His creation," His capitalized, "inalienable
 24 rights." The foundational God that you're talking
 25 about is the God of your Bible, correct?

1 A. God of the Bible, yes. Creator God.

2 Q. And the theme that you selected for '04 is
 3 based on supporting scripture in Leviticus, correct?

4 A. Correct.

5 Q. And it was your hope, as you expressed it to
 6 Secretary Paige, that the message that God is the
 7 Source of freedom and has given His creation
 8 inalienable rights, that this message would be a
 9 catalyst to draw Americans closer to God as they look
 10 to Him for guidance with their personal concerns as
 11 well as those of our leaders, community and country.

12 You wrote that, correct?

13 A. I wrote it along with Master Writers,
 14 correct.

15 Q. Does it reflect more your views or Master
 16 Writers' views?

17 A. I think in that particular sentence -- or
 18 paragraph, I think it would probably be Master Writers
 19 helped craft the way it was worded. Of course, I
 20 always read the letters and I approve them.

21 Q. Pardon?

22 A. I always read the letters and approve them. I
 23 don't let them go out over my signature without reading
 24 them.

25 Q. The letter that you signed indicates that you

1 hope that the theme for '04 will be a catalyst to draw
 2 Americans closer to God. Do you disagree with that?

3 A. No, I agree with that.

4 Q. And then you ask that the Secretary Paige
 5 present a brief message calling for prayer on behalf of
 6 those in the executive branch of government. And did
 7 you mean that?

8 A. Yes.

9 Q. And, in fact, the purpose, as you've expressed
 10 it, of this Cannon office building observance is to
 11 call for prayer, correct?

12 A. Correct.

13 (Exhibit 15 was marked for identification.)

14 Q. (BY MR. BOLTON) Exhibit 15, have you had a
 15 chance to look at it?

16 A. Yes.

17 Q. And was that your invitation to the East Room?
 18 Or this was the Rose Garden observance of the National
 19 Day of Prayer in '08, correct?

20 A. No. I believe this was in the East Room.

21 Q. Okay.

22 A. No. It says the Rose Garden. Do you know
 23 what, it was supposed to be the Rose Garden and then
 24 the White House changed it at the last minute and we
 25 were in the East Room.

1 Q. And Exhibit 15, that was the invitation that
 2 you received?
 3 A. The public liaison's office sends out
 4 invitations. So, yes, this is one that we sent to some
 5 of our constituents. They allow us to choose 100
 6 people, and then they choose their list, which is
 7 usually 250, to attend that.
 8 Q. So at this East Room observance then, how many
 9 people would there be?

10 A. I would say around 230, 250 people.

11 Q. And the task force, you would be allowed to
 12 extend some of the invitations then?

13 A. No. We were allowed to present some names of
 14 people that we would like to be invited. Some were and
 15 some weren't. It all depends on the White House.

16 Q. And do you know what criteria was used to
 17 select who would attend the White House observance of
 18 the day of prayer?

19 A. The First Lady wanted all dimensions of our
 20 culture represented there. She wanted Hispanic, black,
 21 Caucasian, she wanted people with different religions,
 22 she wanted kind of a -- how can I put it? Kind of a
 23 spattering of our culture, just different religions,
 24 different races, poor, wealthy.

25 Q. Do you know whether any nonbelievers were

1 invited?

2 A. I don't know.

3 Q. Would you expect that nonbelievers would be
 4 invited to this observance?

5 A. I don't know. I certainly don't know
 6 everybody who believes and doesn't believe, and I doubt
 7 that the First Lady knew either.

8 Q. In terms of that East Room observance, about
 9 how long would that observance --

10 A. Usually 30 minutes.

11 Q. And how was it conducted? What happened?

12 A. Well, it was a prayer service, and so we would
 13 be led into the East Room and the President would come
 14 in later to be seated, and then the prayer service
 15 started, and that was conducted by the public liaison's
 16 office. It had music, and they had prayers by
 17 different religious people, and then the President
 18 would close by having a short speech.

19 Q. And certainly this observance, then, was
 20 referenced as the designated National Day of Prayer,
 21 correct?

22 A. Right.

23 Q. And that was the reason for the occasion,
 24 correct?

25 A. Yes. They were celebrating -- that was their

1 way of celebrating the National Day of Prayer.
 2 (Exhibit 16 was marked for identification.)

3 Q. (BY MR. BOLTON) Now, I think I presented
 4 Exhibit 16, but correct me, does it have a blue sticker
 5 on it that says Exhibit 16?

6 A. Yes.

7 Q. Can you identify Exhibit 16?

8 A. Yes. It's our National Day of Prayer Task
 9 Force poster.

10 Q. And this was something prepared by the task
 11 force?

12 A. Actually, I misspoke before. Focus on the
 13 Family has an art department. I think I said that
 14 we're charged for the services that they give us, and
 15 so the art department gave us -- gives us three or four
 16 options for our logo and also for our posters, and then
 17 we select the one that we like.

18 Q. Okay. So Exhibit 16 was prepared for the task
 19 force though, correct?

20 A. Yes.

21 Q. How was this poster distributed? Where did
 22 you put it?

23 A. Well, people -- we put it in our catalog, and
 24 people order it if they want it. Sometimes it's put in
 25 businesses, churches. We don't even know where it ends

1 up, but people just order it.

2 Q. But this is a poster that is -- I mean, is it
 3 basically a commemorative then, or is it used also
 4 for --

5 A. We have a different poster every year that
 6 goes with the theme.

7 Q. And at the very top it says, "58th Annual
 8 Observance," then right below that in large lettering
 9 it says, "Prayer, America's Hope," and Prayer,
 10 America's Hope, was your '09 theme?

11 A. Yes.

12 Q. Was this poster used for any purpose, you
 13 know, any sort of, you know, promotional purpose in
 14 terms of alerting people of the observance, or is this
 15 basically just a poster that is created for people who
 16 want to buy it from your catalog and then do whatever
 17 they want with it?

18 A. That's correct.

19 Q. The latter?

20 A. The latter, yes.

21 Q. So it's really a commemorative type of poster
 22 then?

23 A. Right.

24 Q. Okay. It says "58th Annual Observance," and
 25 then immediately below it there's a reference in large

1 letters to the task force's annual theme. Certainly
2 the 58th Annual Observance is not referencing anything
3 to do with the task force itself, correct?

4 A. No. I mean, yes, you're correct about that.

5 Q. Pardon?

6 A. You're correct.

7 Q. And then down at the bottom it says, "National
8 Day of Prayer" and it gives the date and it references
9 the Cannon House Office Building, Caucus Room. With
10 this particular commemorative, is there any cue to
11 people who look at this that this is actually a task
12 force observance?

13 A. Most of the people that join us for the
14 National Day of Prayer in Washington, D.C. I would say
15 are constituents that know about the task force. So
16 I'm sure they would know.

17 Q. But to people that weren't involved in these
18 actual observances -- you say the people who actually
19 participate in the observances would know?

20 A. Uh-huh.

21 Q. If I was not a participant in the observance
22 in the Cannon office building, is there anything in
23 Exhibit 16 that would readily alert me that this is a
24 task force presentation?

25 A. I don't know how people would see this. I

1 A. Yes.

2 Q. What is it?

3 A. It is the program. It's what people are given
4 when they come into the National Day of Prayer
5 observance. They're given a program.

6 Q. Okay. And would this program have been
7 prepared by or for the task force?

8 A. No. We prepare this.

9 Q. So this would have been something that was
10 prepared by the task force itself?

11 A. Yes.

12 Q. And this is the program for the '09 Cannon
13 office building observance, correct?

14 A. Correct.

15 Q. And it says at the top, it says, "National Day
16 of Prayer, Cannon Program." It gives an address. And
17 then it says 9 a.m. to 12 p.m. It is a three-hour
18 program?

19 A. Yes.

20 Q. And about how many attendees are there for the
21 Cannon program?

22 A. I think the building holds about 350.

23 Q. And then that guest list, that's one that the
24 task force controls?

25 A. We invite some people, but it's open to the

1 can't speculate on what you would think or what other
2 people would think.

3 Q. Can we agree, without speculation, that there
4 is nothing on here that makes reference to the task
5 force?

6 A. Correct.

7 Q. Okay.

8 A. Can I ask you a question?

9 Q. Yes.

10 A. Where did you get this? What did this come
11 off of?

12 Q. I don't know.

13 A. Because it's possible that it did have our
14 logo down here saying "task force." It's possible,
15 because we usually don't do a poster without a logo on
16 it.

17 Q. It has the Bates numbers from your lawyer, so
18 it would have come from --

19 MR. THERIOT: Yeah, we provided that to them.
20 The original, you're right, might have something that's
21 a little clearer.

22 A. We usually all put our logo on this that says
23 "task force."

24 (Exhibit 17 was marked for identification.)

25 Q. (BY MR. BOLTON) Can you identify Exhibit 17?

1 public. We have people coming from all over the
2 nation.

3 Q. So in terms of the number of invites that the
4 task force sends out, of that 250 people, about how
5 many of those would be at the invitation of the task
6 force?

7 A. Our public affairs person would have the
8 answer to that.

9 Q. Okay. Do you have any understanding or
10 estimate of how much of that audience is task force
11 invited?

12 A. It varies from year to year. You would have
13 to ask Faye Tharp. She's our public affairs
14 director.

15 Q. Now, when people come to the Cannon program
16 are they given this program?

17 A. Yes.

18 Q. Are they given anything else? Do they get any
19 other written materials?

20 A. I think, on occasion, we've given out our
21 bookmarks which gives the prayer for the 7 times 7, the
22 government, military, media, education, church and
23 family.

24 Q. You said it's open to the public. And
25 presumably the people that are the guests of the task

1 force, I assume they have some sort of reserved
 2 seating.
 3 A. We have a few reserved seats up front, and we
 4 also reserve a section for the congressmen and senators
 5 that might drop in so they will always be able to find
 6 a seat. We save a couple of rows for them.
 7 Q. For those people that are not guests, invited
 8 guests of the task force, but are members of the
 9 public, how are they made aware? How is this Cannon
 10 office National Day of Prayer observance advertised?

11 A. Well, we do radio spots, and we announce that
 12 we're going to be having a Washington, D.C. service at
 13 the Cannon House office building, and we put a little
 14 reminder in roll call that goes in Congress. You know,
 15 you can do that, just announcing that there will be a
 16 service in the Cannon office building, and probably in
 17 some of our literature that we send out.

18 Q. In terms of Exhibit 17, in its own right, is
 19 there an indication on Exhibit 17 that this is an
 20 observance that is sponsored by the National Day of
 21 Prayer Task Force?

22 A. Not on this particular program.

23 Q. To your knowledge, is that typical or
 24 atypical?

25 A. This is the inside of the program. The

1 outside of the program could have the logo saying "task
 2 force." Do you have a copy of that?

3 Q. I don't know.

4 A. I can get a copy.

5 Q. Certainly on Exhibit 17 itself, it is
 6 identified as the Cannon Caucus Room Observance,
 7 correct?

8 A. Yes. But if you look down at the keynote
 9 speaker, it says, "Mrs. Beth Moore, Honorary Chairman,
 10 National Day of Prayer Task Force."

11 Q. Well, it also says, "Prayer for the Nations,
 12 Ambassador to the United States," and I'm assuming that
 13 the indication of any of these other people does not
 14 actually identify the sponsor of this observance,
 15 correct?

16 A. Well, down below it says, "Prayer Challenge,
 17 Mr. Brian Toon, Vice Chairman, National Day of Prayer
 18 Task Force."

19 MR. THERIOT: Rich, I was just provided a
 20 document that appears to be the whole document. If you
 21 want to, you can refer to that.

22 MR. BOLTON: Can we mark this?

23 MR. ROSENBERG: Yeah.

24 (Exhibit 18 was marked for identification.)

25 Q. (BY MR. BOLTON) What we've marked as Exhibit

1 18 looks like -- you made reference that Exhibit 17 was
 2 an inside page of the Cannon Caucus Room Observance
 3 from '09 and that it was part of a larger program. Is
 4 Exhibit 18 the entire program?

5 A. Yes, I believe it is.

6 Q. The first page, at least as we looked at it,
 7 doesn't necessarily -- I didn't see any reference to
 8 the task force on the first page or the second page.
 9 Am I correct?

10 A. This is a program that's a bifold. All the
 11 information is on it, front, inside and back. It's all
 12 one piece.

13 Q. At least as it's been reproduced here, the
 14 third page, though, does show basically the task
 15 force -- basically your employees -- and I don't have a
 16 copy in front of me, but certainly many references to
 17 the task force, correct?

18 A. Yes.

19 Q. So there's certainly nothing then about
 20 Exhibit 18 that would indicate that this is a
 21 nondenominational observance, correct? I mean, the
 22 Cannon office building observance is -- I mean, it's a
 23 task force presentation, correct?

24 A. Other faiths are not included, but the program
 25 is a Judeo-Christian expression of the National Day of

1 Prayer, our task force expression.

2 Q. And certainly in '09, that's what it was,
 3 correct?

4 A. Yes.

5 Q. And that's been the tenor of the observance in
 6 the Cannon office building since you've been the
 7 chairman of the task force, correct?

8 A. Since Vonette Bright has been the chairman.

9 Q. You became the cochair in 1989. And as I
 10 understand it, the task force was created in '88. Do
 11 you know whether the task force was created before or
 12 after the National Day of Prayer was celebrated in
 13 1988?

14 A. Vonette Bright would know the answer to that.
 15 I'm not sure on that.

16 Q. Certainly, you've been involved pretty much
 17 then, if not for the entire -- all of the observances
 18 in the Cannon office building, certainly all of them
 19 except one, correct?

20 A. I don't know how many previous services were
 21 in the Cannon House office building, but I have
 22 attended and helped with the program since 1991 when
 23 became chairman.

24 Q. And then do you attend as well, then, all of
 25 the -- I mean, in the last few years, you had attended

1 the White House observance, and then would you go from
 2 the White House observance to the Cannon office
 3 building observance?
 4 A. Yes, because that's our national observance,
 5 so I would be there.
 6 Q. Reverend Claude Pike, is that a name that
 7 you're familiar with?
 8 A. No.
 9 Q. My understanding is that in 1982, he was
 10 trying to encourage President Reagan to make a bigger
 11 thing of the National Day of Prayer and that Ronald
 12 Reagan gathered religious leaders in 1982 to witness
 13 his signing of the National Day of Prayer proclamation
 14 that year. Were you or your husband invited to that?
 15 A. I was invited.
 16 Q. Okay. Do you recall it?
 17 A. Yes.
 18 Q. Did you attend?
 19 A. No.
 20 Q. Were you simply not able to attend, or was
 21 there any -- did you have any objection to attending?
 22 A. I don't remember what the circumstances were,
 23 but I didn't attend it, and I think it was my choice,
 24 but I'm sorry now that I didn't because it was a very
 25 important thing in our nation, and I wish I would have

1 A. Well, I think any time a president signs into
 2 law some type of bill, I think it's an honor to be
 3 there. And since I am a product of prayer as a small
 4 child and have grown up believing in the power of
 5 prayer, and to have a president sign into law the first
 6 Thursday of May, that's a very big thing to me.
 7 Q. Did it give it more meaning than the
 8 legislation that was signed by President Truman in
 9 1952?
 10 A. I think so. I think people of faith wanted to
 11 have a day that they could know was going to be a day
 12 of prayer instead of just letting it be at the whim of
 13 the President.
 14 Q. Certainly calendar makers would agree with
 15 that?
 16 A. Yes. Hallmark liked it.
 17 Q. Pardon?
 18 A. Hallmark liked it.
 19 Q. And, certainly, your staff would agree with
 20 that; it's a lot easier to organize around a date
 21 certain, correct?
 22 A. Yes.
 23 Q. Susan Turner, is that a name you're familiar
 24 with?
 25 A. Yes.

1 been there.
 2 Q. It was a very important what?
 3 A. I think it was a very important document that
 4 was signed for our nation, and I wish I had been
 5 there.
 6 Q. And just so we're clear, what did you
 7 understand that you were invited to watch President
 8 Reagan sign in 1982?
 9 A. I heard that he was going to sign into law
 10 that the first Thursday of May was going to be our
 11 national day of prayer.
 12 Q. And just so we're clear, I was referring to a
 13 different -- that was in 1988. My understanding was
 14 that President Reagan gathered some religious leaders
 15 to witness his signing, just his signing of the 1982
 16 National Day of Prayer proclamation. So we're talking
 17 about different things. And just so we're clear, that
 18 1982 signing of the proclamation was not what you were
 19 referring to that you were invited to?
 20 A. No. I was referring to the signing into law
 21 the first Thursday of May.
 22 Q. And in terms of the 1988 signing into law that
 23 mandated the first Thursday in May of each year to be
 24 designated the day of prayer, why do you believe that
 25 that was an important occasion?

1 Q. And who is Susan Turner?
 2 A. She's a volunteer. She comes and helps at our
 3 office in many ways, and she provides scholarship money
 4 for when we have a prayer coleader's conference or a
 5 prayer summit and people want to come but can't afford
 6 to come, she provides assistance for them.
 7 Q. Was she involved in the National Day of Prayer
 8 coordinators' school event? There's a document that
 9 I've seen called the NDP Coordinators' School Prayer
 10 Event.
 11 A. That's misnamed. We have a prayer summit in
 12 October which used to be called coordinators'
 13 conference, and that's where we bring our coordinators
 14 from around the nation here for a prayer service.
 15 Q. In terms of the constituencies that the task
 16 force has come to mobilize, you've got a lot of
 17 different groups with people targeting different
 18 groups. Are schools in the observance of the National
 19 Day of Prayer a targeted group?
 20 A. Not really. If any school does anything on
 21 the National Day of Prayer, it's usually student led
 22 and it is within the parameter of what is
 23 appropriate.
 24 Q. Is there anybody who has sort of designated
 25 responsibility for mobilizing schools and school-aged

1 kids?
 2 A. No.
 3 Q. The National Day of Prayer, on its Website,
 4 indicates that its goal is to provide collective
 5 servant leadership to the national prayer movement.
 6 National prayer movement, is that a term of art that is
 7 identified with anything in particular?
 8 A. The National Prayer Committee is made up of
 9 leaders of prayer ministries all across the nation. So
 10 I think he was using a broad term there.
 11 MR. BOLTON: I'm almost done. Why don't we
 12 take about a five-minute break just for me to look
 13 through my notes, and then I'll at least be done.
 14 THE WITNESS: Okay.
 15 MR. BOLTON: Thank you.
 16 (A brief break was taken.)
 17 (Exhibit 19 was marked for identification.)
 18 Q. (BY MR. BOLTON) Mrs. Dobson, I've handed you
 19 what I've marked as Exhibit 19. Can you identify that
 20 document?
 21 A. Let me look at this.
 22 Q. While you're looking, I will tell you that
 23 when I looked at it, it looked like it was directed to
 24 coordinators of National Day of Prayer observances at
 25 the school level.

1 A. Susan has a real heart for children, and she's
 2 a real -- what I would call a prayer warrior, and
 3 there's so much violence and corruptness in our schools
 4 that, I think, she really felt it would be a good thing
 5 if students that wanted to pray had a place and a time
 6 to pray on the National Day of Prayer. It could be on
 7 the 50-yard line, it could be around their flagpole in
 8 the morning. They have this prayer day, I believe it's
 9 in September, See You at the Pole, where students
 10 gather around the flagpoles for prayer, and we don't
 11 have anything to do with that. That's something
 12 else.
 13 Q. When you say she's a "prayer warrior," it's
 14 interesting, because when I read through the guide that
 15 she put together there, there seems to be a lot of
 16 pushback to something that happened in 1962, what she
 17 construed to be the Supreme Court's decision that said
 18 that religion had to be banished from the schools. Is
 19 that something that you know her to be quite concerned
 20 about?
 21 A. I have not talked to her about it. I don't
 22 know if she's concerned about it.
 23 Q. Certainly Exhibit 19, though, is an official
 24 task force document. Are there views in there that are
 25 expressed that you disagree with that you've had a

1 A. It looked like Susan Taylor put this
 2 together -- or Turner, I'm sorry. What was your
 3 question?
 4 Q. Well, first of all, have you seen that
 5 document before?
 6 A. I have not.
 7 Q. I mean, do you have any reason to believe that
 8 that's not a National Day of Prayer Task Force
 9 document?
 10 A. No, I believe it is a National Day of Prayer
 11 Coordinators' School Prayer Event Guide as it says. I
 12 just have not seen it.
 13 Q. Does it refresh your recollection, then, as to
 14 coordinating activities directed toward observances at
 15 the school level?
 16 A. Susan Turner put this together for our state
 17 coordinators, I believe, and what is allowed and what
 18 is not allowed in schools for prayer on the National
 19 Day of Prayer or prayer any time. There are certain
 20 restrictions.
 21 Q. And Susan Taylor apparently put this together,
 22 correct?
 23 A. Turner, yes.
 24 Q. Does she have any background, or why would
 25 this be something that she would have done?

1 chance to see? And I recognize you've only glanced at
 2 it.
 3 A. I have not read it, but I would assume that
 4 our executive director has read it and okayed it.
 5 Q. Okay. With regard to the formation of the
 6 task force by the National Prayer Committee, are
 7 there -- first of all, the National Prayer Committee, I
 8 assume, is a wholly transparent organization? I mean,
 9 its membership is public, correct?
 10 A. On the back of our letterhead, it has all the
 11 names.
 12 Q. And since I don't know anybody, I wouldn't
 13 recognize names that I should recognize. Were there
 14 any government officials on the National Prayer
 15 Committee, to your knowledge --
 16 A. No.
 17 Q. -- at the time of the formation of the task
 18 force?
 19 A. No.
 20 Q. I think I asked whether or not you had had
 21 occasion to talk with President Bush about the National
 22 Day of Prayer, and I believe your answer was that you
 23 had not.
 24 A. Correct.
 25 Q. Do you know whether other task force staff or

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1 employees had any direct communication with the White
 2 House regarding the National Day of Prayer?
 3 A. With the White House or with the President?
 4 Q. The President or his -- with the White House.
 5 A. No one has ever had a conversation with the
 6 President. The only one that we have spoken to at the
 7 White House was the public liaison who is in charge, I
 8 guess, of the program and whether they have a prayer
 9 service or not.
 10 Q. Have you or your husband ever stayed at the
 11 White House in regards to the National Day of Prayer?
 12 A. It would be nice, but no. No.
 13 Q. Have you been to the White House for any
 14 nonNational Day of Prayer functions?
 15 A. Yes.
 16 Q. And on how many occasions?
 17 A. When I have attended, it has always been with
 18 my husband, and it's usually been some religious
 19 leadership meeting that the President wanted to have or
 20 a signing of a bill about abortion, we were invited for
 21 that, along with -- not privately, but along with like
 22 200 people.
 23 Q. And how many times have you been at one of
 24 those functions?
 25 A. Under President George W. Bush?

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1 Q. Any president. I won't ask how many that
 2 would be.
 3 A. I have no idea, because my husband has been on
 4 commissions with presidents.
 5 Q. So is it fair to say that you've been to the
 6 White House --
 7 A. Several times but not privately, always with a
 8 group.
 9 Q. Do you believe that the Bible is literally
 10 true word for word and is the inspired word of God?
 11 A. I do.
 12 MR. BOLTON: I think that's all I have.
 13 EXAMINATION
 14 BY MR. THERIOT:
 15 Q. Mrs. Dobson, I just had a couple of questions
 16 to clarify the record. With the original setting up of
 17 the National Day of Prayer Task Force, that was
 18 undertaken by the National Prayer Committee and
 19 Mrs. Bright; is that right?
 20 A. The initial, yes.
 21 Q. And you weren't involved in that whatsoever?
 22 A. No.
 23 Q. And then as far as you're aware, any funding
 24 from Focus on the Family for the task force didn't
 25 occur until after you became chairman; is that right?

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1 A. That's right.
 2 MR. THERIOT: I believe that's all I have.
 3 MR. ROSENBERG: I actually have a few
 4 questions.
 5 EXAMINATION
 6 BY MR. ROSENBERG:
 7 Q. Good afternoon, Mrs. Dobson.
 8 A. Good afternoon.
 9 Q. My name is Brad Rosenberg. I'm a trial
 10 attorney in the civil division of the United States
 11 Department of Justice. And as we discussed a little
 12 bit earlier, I'm here representing President Obama and
 13 White House Press Secretary Robert Gibbs. When this
 14 lawsuit was first filed, as the Department of Justice
 15 attorney, I was representing President Bush and
 16 then-White House Press Secretary Dana Perino but, of
 17 course, there was a change in administration in January
 18 2009. We haven't met before today, have we?
 19 A. No.
 20 Q. Mrs. Dobson, are you a lawyer?
 21 A. No.
 22 Q. Do you have any legal training?
 23 A. No.
 24 Q. You testified earlier today a little bit about
 25 the National Day of Prayer statute. Are you familiar

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1 with the specific language in that statute?
 2 A. I don't think we ever used the word "statute."
 3 Q. You are aware, of course, that there is a
 4 statute regarding the National Day of Prayer?
 5 A. Well, explain to me what you mean by
 6 "statute."
 7 Q. The law that Congress passed, for example, in
 8 1952.
 9 A. Yes, okay.
 10 Q. And then Congress passed another law in 1988.
 11 A. Yes.
 12 Q. Are you familiar with the specific language
 13 used in that law regarding the National Day of
 14 Prayer?
 15 A. I have read it, but I couldn't repeat it to
 16 you.
 17 Q. Have you reviewed the legislative history of
 18 that statute?
 19 A. Not really.
 20 Q. We discussed earlier the fact that in 2009,
 21 President Obama did not hold an event at the White
 22 House. And you were a bit disappointed by that?
 23 A. Yes.
 24 Q. We've also discussed at some length the event
 25 that was held in 2009 at the Cannon House office

1 building. Can you just describe for me what took place
2 at that event?

3 A. Well, it's a prayer service, and it's open to
4 the public, and we have a program. Every year we have
5 an honorary chairperson. This year it's Dr. Franklin
6 Graham. Last year it was Beth Moore. So the honorary
7 chairperson gives a message, and then we have
8 representatives that come over and represent, as I
9 said, the three branches of government plus the
10 military, and then sometimes we highlight sports,
11 sometimes we highlight media, and then we'll have

12 somebody from those areas come over and represent them.
13 And so -- and then we have some worship music, and it's
14 just a prayer service. It lasts from 9 to 12.

15 Q. And actually that was the next question I was
16 going to ask, when the event at the Cannon House office
17 building took place. Did it wrap up at 12 p.m.?

18 A. Yes.

19 Q. Do you recall when President Obama issued his
20 2009 National Day of Prayer proclamation?

21 A. All I know is that it got on the White House
22 Website at 3:00 on the National Day of Prayer.

23 Q. Did you have access to the White House's
24 National Day of Prayer proclamation before 3:00?

25 A. No.

1 Q. You testified earlier that -- and I don't have
2 exact notes on this, so clarify if I'm misstating this
3 in any way, that the National Day of Prayer Task Force
4 encourages individuals to pray?

5 A. Yes.

6 Q. Do you consider prayer to be a voluntary
7 activity?

8 A. Yes.

9 Q. So if somebody is inclined to pray, of course,
10 they can go ahead and pray, but if not, do you think
11 that the National Day of Prayer Task Force would
12 require them to pray in any way?

13 A. We never require anybody to pray. It's
14 optional. We might request it, but we don't demand
15 it.

16 Q. And there's no way that you could, of course,
17 demand it?

18 A. No.

19 Q. Because everybody has the right to express
20 their own religious views or the lack of their
21 religious views in their own manner?

22 A. That's right.

23 Q. I just had one last question. At the end of
24 Mr. Bolton's questioning, he asked about the number of
25 times that you visited the White House. Have you

1 Q. Was that proclamation used at all during the
2 services at the Cannon House office building?

3 A. It was too late to be used by the Cannon House
4 observance and by our coordinators and by anyone else.
5 I think it's the latest any president has ever written
6 a proclamation.

7 Q. Now, if the Court, the District Court in this
8 case, were to strike down the National Day of Prayer
9 statute and were to order that the President could not
10 issue National Day of Prayer proclamations, could the
11 National Day of Prayer Task Force still coordinate
12 prayer events on the first Thursday in May of each
13 year?

14 A. Yes.

15 Q. And it could still call it the National Day of
16 Prayer, could it not?

17 A. I don't know what the legal ramifications of
18 that are. If we're allowed to, yes, we could still
19 call it a National Day of Prayer, I imagine.

20 Q. And, in fact, the fact that you had an event
21 at the Cannon House office building before the
22 President of the United States even issued a
23 proclamation would demonstrate that the National Day of
24 Prayer Task Force could still coordinate events?

25 A. That's correct.

1 visited the White House at all since President Obama
2 took office?

3 A. No.

4 Q. Has your husband?

5 A. No.

6 MR. ROSENBERG: I think that's all I have.
7 Thank you very much.

8 MR. BOLTON: Tom, are you there?

9 MR. BELLAVIA: Yes, I am.

10 MR. BOLTON: Did you want to ask anything?

11 MR. BELLAVIA: No, I don't have any questions
12 Thanks.

13 MR. BOLTON: Let me just ask one follow-up.

14 EXAMINATION

15 BY MR. BOLTON:

16 Q. Attorney Rosenberg asked whether you had any
17 legal training, and you said no. Would I be fair to
18 conclude that you don't wish to have any legal
19 training?

20 A. This is the first time I've ever been deposed,
21 so no, no, I don't think that's in my future.

22 MR. BOLTON: I'm just teasing you. Thank you
23 very much.

24 MR. ROSENBERG: Thanks.

25 (The proceedings concluded at 2:30 p.m.)

SIGNATURE OF WITNESS

I, SHIRLEY DOBSON, the witness in the above deposition, have read the within transcript of my testimony. I have made _____ changes in said testimony and have stated such changes (if any) and the reason for each change on a separate sheet attached to this transcript. My testimony as given herein is true and correct to the best of my knowledge and belief.

Shirley Dobson

Subscribed and sworn to before me this _____ day of _____, 20__.

Notary Public

My commission expires _____.

REPORTER'S CERTIFICATE

I, Connie S. Dyke, Register Professional Reporter and Certified Realtime Reporter, appointed to take the deposition of SHIRLEY DOBSON, do certify that before the deposition he was duly sworn by me to testify to the truth; that the deposition was taken by me at 8605 Explorer Drive, Colorado Springs, Colorado, on November 10, 2009, then reduced to typewritten form consisting of 179 pages herein; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not related to any party herein or their counsel, and have no interest in the result of this litigation.

In witness hereof, I have hereunto set my hand this 24th day of November, 2009.

Connie S. Dyke, RPR, CRR
Notary Public

My commission expires June 28, 2010