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5 Attorneys for Plaintiffs  
ELKHORN BAPTIST CHURCH et al.

7 IN THE CIRCUIT COURT OF THE STATE OF OREGON  
8 IN AND FOR THE COUNTY OF BAKER

9 ELKHORN BAPTIST CHURCH, An  
Oregon Non-Profit Corporation;  
10 CALVARY CHAPEL NEWBERG, An  
Oregon Non-Profit Corporation;  
11 CALVARY CHAPEL LINCOLN  
CITY, An Oregon Non-Profit  
12 Corporation; CALVARY CHAPEL  
SOUTHEAST PORTLAND, An  
13 Oregon Non-Profit Corporation; NEW  
HORIZON CHRISTIAN  
14 FELLOWSHIP, An Oregon Non-Profit  
Corporation; CAMAS VALLEY  
15 CHRISTIAN FELLOWSHIP, An  
Oregon Non-Profit Corporation;  
16 PEOPLES CHURCH, An Oregon Non-  
Profit Corporation; PREPARE THE  
17 WAY, An Oregon Non-Profit  
Corporation; BEND COMMUNITY  
18 CHURCH, An Oregon Non-Profit  
Corporation; COVENANT GRACE  
19 CHURCH, An Oregon Non-Profit  
Corporation; JEDIDIAH  
20 McCAMPBELL, An Individual;  
RONALD OCHS, An Individual;  
21 BRIAN NICHOLSON, An Individual;  
JAMES B. THWING, An Individual;  
22 MARK RUSSELL, An Individual;  
PHIL MAGNAN, An Individual;  
23 RONALD W. RUST, An Individual;  
TRAVIS HUNT, An Individual;  
24 MASON GOODKNIGHT, An  
Individual; MARK MAYBERRY, An  
Individual; LORI MAYBERRY, An  
25 Individual; BENJAMIN STEERS, An  
Individual; MICHAEL CARROLL, An  
26 Individual; KEVIN J. SMITH, An

Case No.:

**VERIFIED COMPLAINT FOR  
DECLARATORY AND  
INJUNCTIVE RELIEF [Or. R. Civ.  
P. 79(1)(B)]**

1 Individual; POLLY JOHNSON, An  
Individual; BENJAMIN BOYD, An  
2 Individual; ANNETTE LATHROP, An  
Individual; ANDREW S.  
3 ANTANASOFF, An Individual;  
SHERRY L. ATANASOFF, An  
4 Individual; MICAH AGNEW, An  
Individual; and ANGELA  
ECKHARDT, An Individual,

5  
6 Plaintiffs,

7 v.

8 KATHERINE BROWN, Governor of  
9 the State of Oregon; and DOES 1  
10 THROUGH 50, Inclusive,

11 Defendants.

12 **INTRODUCTION**

13 In responding to the currently ongoing worldwide coronavirus pandemic,  
14 KATHERINE “KATE” BROWN (“GOVERNOR”), Oregon’s presiding Governor  
15 and the Defendant in this proceeding, has exceeded her constitutional authority:  
16 Pursuant to Article X-A, § 6 of the Oregon Constitution, after GOVERNOR  
17 declares a public health emergency, GOVERNOR may only exercise her  
18 emergency powers for 30 days. If, in the judgment of GOVERNOR, conditions  
19 necessitate an extension of time to exercise her emergency powers to effectively  
20 respond to a public health emergency, she has lawful recourse by obtaining  
21 approval from three-fifths of each house of the Legislature before the prescribed  
22 30-day period expires. Because GOVERNOR failed to avail herself of the  
23 constitutionally prescribed procedure, her initial executive order declaring the  
24 public health emergency, issued on March 8, 2020, terminated by operation of law  
25 on April 7, 2020, and all subsequent executive orders implementing or extending  
26 the original order are legally null and void.

1 That notwithstanding, GOVERNOR is using the threat of criminal sanctions  
2 against Oregonians – including Plaintiffs – who do not comply with her expired  
3 orders. Accordingly, the Plaintiffs named below seek (1) a judicial declaration that  
4 Executive Orders 20-03, 20-12, and 20-24 have expired via operation of law, and  
5 (2) a court order enjoining enforcement of the executive orders.

6 Based on the foregoing, the Plaintiffs in the herein proceeding, who are  
7 named below, hereby allege as follows:

8 **PARTIES**

9 1. Plaintiffs are, and at all times herein were, U.S. citizens and residents  
10 of Oregon.

11 2. Plaintiff ELKHORN BAPTIST CHURCH (“EBC”) is, and at all times  
12 herein was, a religious non-profit corporation that operates a church in, and serves  
13 the people of, the City of Baker City, in the County of Baker.

14 3. Plaintiff CALVARY CHAPEL NEWBERG (“CC-NEWBERG”) is,  
15 and at all times herein was, a religious non-profit corporation that operates a church  
16 in, and serves the people of, the City of Newberg, in the County of Yamhill.

17 4. Plaintiff CALVARY CHAPEL LINCOLN CITY (“CC-LINCOLN  
18 CITY”) is, and at all times herein was, a religious non-profit corporation that  
19 operates a church in, and serves the people of, the City of Lincoln City, in the  
20 County of Lincoln.

21 5. Plaintiff CALVARY CHAPEL SOUTHEAST PORTLAND (“CC-  
22 SOUTHEAST PORTLAND”) is, and at all times herein was, a religious non-profit  
23 corporation that operates a church in, and serves the people of, the City of Portland,  
24 in the County of Multnomah.

25 6. Plaintiff NEW HORIZON CHRISTIAN FELLOWSHIP (“NEW  
26 HORIZON”) is, and at all times herein was, a religious non-profit corporation that

1 operates a church in, and serves the people of, the City of Klamath Falls, in the  
2 County of Klamath.

3 7. Plaintiff CAMAS VALLEY CHRISTIAN FELLOWSHIP (“CVCF”)  
4 is, and at all times herein was, a religious non-profit corporation that operates a  
5 church in, and serves the people of, the town of Camas Valley, in the County of  
6 Douglas.

7 8. Plaintiff PEOPLES CHURCH (“PEOPLES”) is, and at all times  
8 herein was, a religious non-profit corporation that operates a church in, and serves  
9 the people of, the City of Salem, in the County of Marion.

10 9. Plaintiff PREPARE THE WAY (“PTW”) is, and at all times herein  
11 was, a religious non-profit corporation that operates a ministry in, and serves the  
12 people of, the City of Bend, in the County of Deschutes.

13 10. Plaintiff BEND COMMUNITY CHURCH (“BCC”) is, and at all  
14 times herein was, a religious non-profit corporation that operates a ministry in, and  
15 serves the people of, the City of Bend, in the County of Deschutes.

16 11. Plaintiff COVENANT GRACE CHURCH (CGC, and collectively  
17 with EBC, CC-NEWBERG, CC-LINCOLN CITY, CC-SOUTHEAST  
18 PORTLAND, NEW HORIZON, CVCF, PEOPLES, PTW, and BCC the  
19 “CHURCHES”) is, and at all times herein was, a religious non-profit corporation  
20 that operates a ministry in, and serves the people of, the City of Roseburg, in the  
21 County of Douglas.

22 12. Plaintiff JEDIDIAH McCAMPBELL (“McCAMPBELL”) is, and at  
23 all times herein was, a congregant of Trinity Presbyterian Church in the City of  
24 Medford, in the County of Jackson.



1           21. Plaintiff LORI MAYBERRY is, and at all times herein was, a resident  
2 of the City of Riddle, in the County of Douglas, and the congregant of a local  
3 church.

4           22. Plaintiff BENJAMIN STEERS (“STEERS”) is, and at all times herein  
5 was, a resident of the City of Grants Pass, in the County of Josephine, and the  
6 congregant of a local church.

7           23. Plaintiff MICHAEL CARROLL (“CARROLL”) is, and at all times  
8 herein was, a resident of West Linn, in the County of Clackamas, and the  
9 congregant of a church in Portland, in the County of Multnomah.

10          24. Plaintiff KEVIN J. SMITH (“SMITH”) is, and at all times herein was,  
11 a resident of Portland, in the County of Multnomah, and the resident of a local  
12 church.

13          25. Plaintiff POLLY JOHNSON (“JOHNSON”) is, and at all times herein  
14 was, a resident of the City of Pendleton, in the County of Umatilla, and the  
15 congregant of a local church.

16          26. Plaintiff BENJAMIN BOYD (“BOYD”) is, and at all times herein  
17 was, a resident of the City of Enterprise, in the County of Wallowa, and the  
18 congregant of a local church.

19          27. Plaintiff ANNETTE LATHROP (“LATHROP”) is, and at all times  
20 herein was, a resident of the City of Joseph, in the County of Wallowa, and the  
21 congregant of a local church.

22          28. Plaintiff KEVIN J. SMITH (“SMITH”) is, and at all times herein was,  
23 a resident of Portland, in the County of Multnomah, and the congregant of a local  
24 church.



1 **JURISDICTION & VENUE**

2 35. Plaintiffs refer to and hereby incorporate the allegations of Paragraphs  
3 1 through 34 into this Paragraph as if fully set forth herein.

4 36. Pursuant to ORS 14.060, the Circuit Court In and For the County of  
5 Baker (the “Court”) may exercise jurisdiction over any state official or officer, as  
6 such, or in virtue of such status. Furthermore, ORS 14.060 allows plaintiffs to  
7 bring suit in the county wherein the cause of suit, or some part thereof, arose. As  
8 illustrated below, this case concerns Defendant GOVERNOR’s executive orders  
9 affecting the entire State of Oregon, meaning all or part of Plaintiffs’ cause of  
10 action arose in every county in the state, including Baker County.

11 **GENERAL ALLEGATIONS**

12 37. Plaintiffs refer to and hereby incorporates by reference the allegations  
13 set forth in Paragraphs 1 through 36 into this Paragraph as if fully set forth herein.

14 38. Plaintiff EBC is a church that hosts two worship services – one at 11  
15 a.m., one at 6 p.m. – every Sunday on its real property at 3520 Birch Street in  
16 Baker City. Approximately 25 to 40 people typically attend the first service;  
17 approximately 15 to 20 people typically attend the second. EBC also hosts Sunday  
18 school at 10 a.m. every Sunday.

19 39. Plaintiff EBC hosts approximately 12 adults for Wednesday night  
20 Bible study and prayer on Wednesday nights. EBC also hosts children in its  
21 Discovery Kids program every Wednesday.

22 40. The coronavirus, aka COVID-19, is a novel infectious agent that may  
23 cause respiratory disease leading to serious injury or death. Discovered in late  
24 2019, the coronavirus caused a worldwide pandemic that made its way into the  
25 United States as early as January 2020 and spread rapidly from there.







1 Deschutes, where Plaintiff PTW operates a ministry; and Wallowa, where Plaintiff  
2 ECKHARDT lives and attends church. *Id.*

3 49. The counties of Josephine, where Plaintiff STEERS lives and attends  
4 church, and Umatilla, where Plaintiff JOHNSON lives and attends church, have  
5 only had one coronavirus-related death apiece despite having a combined 92  
6 confirmed coronavirus cases. *See Ex. “D.”*

7 50. Only in the counties of Multnomah, Washington, and Marion, which  
8 boast the three highest totals of confirmed coronavirus cases in the state, have the  
9 death tolls climbed into double digits – and even then, the percentage of deaths  
10 relative to the total number of cases in each county has not exceeded 6.1 percent.  
11 *See Ex. “D.”*

12 51. Although they strongly believe, not unreasonably, that Executive  
13 Order 20-12 impinges on their constitutionally protected religious rights to  
14 assemble and worship corporately and do other acts that the Bible requires, the  
15 Plaintiff CHURCHES – including and especially Baker County’s own EBC – have  
16 thus far complied with Executive Order 20-12 for multiple reasons:

- 17 a. First, failure to comply with Executive Order 20-12 is punishable  
18 as a Class C misdemeanor pursuant to ORS 401.990. *See Ex. C*  
19 [pp. 3-4, ¶ 1.e]. CHURCHES do not want to expose themselves to  
20 criminal liability, nor do they want their congregants to do so –  
21 especially since they would face a 30-day jail sentence and/or a  
22 fine of up to \$1,250. *Id.*
- 23 b. Second, even if they wanted to host gatherings such as Sunday  
24 services, Bible studies, and youth group meetings – not to mention  
25 special events such as religious conferences, weddings, and  
26 funerals – CHURCHES might not logistically be able to do so

1 while observing the social distancing requirements set forth in  
2 Executive Order 20-12. This is especially given that CHURCHES  
3 vary in the size of their congregations, and their houses of worship  
4 vary in size and layout. CHURCHES have already had to forego  
5 services on Easter Sunday, arguably the most important holy day  
6 on the Christian calendar, and are facing having to cancel services  
7 on Mother's Day (Sunday, May 10, 2020), which is traditionally  
8 another big day for church services.

- 9 c. Third, at the outset of the coronavirus pandemic, many, if not all,  
10 CHURCHES shared Defendant GOVERNOR's concerns about  
11 having too many people too close together indoors, thereby  
12 increasing the risk of spreading the coronavirus, especially to the  
13 persons most vulnerable to it, such as the elderly. However, given  
14 that in many parts of Oregon, including and especially Baker  
15 County, there have been few, if any, coronavirus cases – let alone  
16 deaths – CHURCHES believe the risk is minimal, or at least has  
17 been reduced drastically. *See* Ex. "D." Accordingly, CHURCHES  
18 believe the breadth of Executive Order 20-03 and the orders  
19 implementing it is no longer justified. Based on the final line of  
20 Executive Order 20-12, however, [*see* ¶ 53, below], CHURCHES  
21 have no idea how long it will be until GOVERNOR lets them  
22 resume freely exercising their constitutionally protected religious  
23 rights, and are at GOVERNOR's mercy until she does.
- 24 d. Fourth, CHURCHES believed any restrictions Executive Order 20-  
25 12 placed on the free exercise of religion would be temporary.



1 infrastructure, environment, economy or government function of the state.” Article  
2 X-A, § 1(2)(d) defines “catastrophic disaster” to include a “public health  
3 emergency.”

4 59. The current coronavirus pandemic meets the definitions of  
5 “catastrophic disaster” set forth in Article X-A, § 1(2)(d) of the Oregon  
6 Constitution.

7 60. Section 6(1) of Article X-A declares that once Defendant  
8 GOVERNOR has declared a state of emergency pursuant to § 1 – as she did on  
9 March 8, 2020 [*see* Ex. “A”] – the state of emergency is only in effect for 30 days.  
10 If GOVERNOR wishes to extend the state of emergency, Article 6(2) outlines a  
11 procedure for doing so: Before the expiration of the prescribed 30 days,  
12 GOVERNOR must convene the Legislature and obtain approval of a three-fifths  
13 majority in each of the Legislature’s two houses.

14 61. Furthermore, Article X-A, § 6(5) declares that Defendant  
15 GOVERNOR “may not invoke the provisions of” § 1 “more than one time with  
16 respect to the same catastrophic disaster.” In other words, if GOVERNOR fails to  
17 properly extend a state of emergency as required under § 6(2), she cannot  
18 unilaterally extend the state of emergency by declaring the emergency anew.

19 62. Subsections (2) and (5) of Article X-A, § 6 exist to strike an  
20 appropriate balance between allowing Defendant GOVERNOR the latitude to act  
21 unilaterally in the event of a crisis endangering public health and safety and  
22 ensuring that any infringement on constitutionally protected rights, however  
23 necessary, is limited in duration. *See* Attached **Exhibit “F”** [relevant pages from  
24 the voter pamphlet for Oregon’s 2012 general election – specifically, see p. 41,  
25 which states that Article X-A “will maintain (Oregon’s) system of checks and  
26 balances, allowing state government to effectively react to a critical and tragically

1 challenging event”]. It is thus imperative that GOVERNOR follow the procedure  
2 outlined in Article X-A to ensure that she does not disregard the constitutionally  
3 protected rights of Oregonians in perpetuity in the name of protecting public health  
4 and safety.

5 63. Defendant GOVERNOR neither convened the Legislature nor secured  
6 the votes required to extend the state of emergency pursuant to Article X-A, § 6(2)  
7 of the Oregon Constitution. *See* Attached **Exhibit “G”** [a copy of a news article  
8 from OregonLive.com, The Oregonian newspaper’s website, dated March 31,  
9 2020, in which the president of the Oregon Senate declares that the Legislature  
10 would not convene to address the coronavirus pandemic].

11 64. Because Defendant GOVERNOR neither convened the Legislature  
12 nor secured the votes required to extend the state of emergency pursuant to Article  
13 X-A, § 6(2) of the Oregon Constitution, Executive Order 20-03, which  
14 GOVERNOR issued on March 8, 2020 [*see* Ex. “A”], effectively terminated by  
15 operation of law on April 7, 2020 – the order’s stated expiration date of May 7,  
16 2020 notwithstanding. *See* Attached **Exhibit “H”** [a page from TimeandDate.com  
17 showing the calculation of Executive Order 20-03’s actual expiration date].

18 65. When Defendant GOVERNOR declared a state of emergency in  
19 response to the coronavirus pandemic, she declared that she did so pursuant to  
20 ORS 401.165 *et seq.* and made no mention of Article X-A, § 1 of the Oregon  
21 Constitution. *See* Ex. “A.” However, ORS 401.165 *et seq.* is not a means by  
22 which GOVERNOR may bypass the strictures of the Oregon Constitution, which  
23 she swore to uphold when she assumed the state’s highest office. *See* Ex. “F”  
24 [stating that Article X-A “assures that the Governor and the Legislature will be  
25 able to work *as a team* to meet the urgent needs of Oregonians who have been  
26 subjected to a catastrophic disaster” (emphasis added)]. Even though

1 GOVERNOR used the words “state of emergency,” not “catastrophic disaster,” the  
2 term “catastrophic disaster,” as defined in Article X-A, § 1(1) and 1(2)(d), includes  
3 “public health emergencies” such as the current coronavirus pandemic.

4 GOVERNOR thus effectively declared a statewide catastrophic disaster on March  
5 8, 2020, even though she did not use the term “catastrophic disaster.” *See* Ex. “A.”

6 66. The Court should also note that Article X-A was added to the Oregon  
7 Constitution by Oregon voters in the 2012 general election. *See* Ex. “F.” By  
8 contrast, ORS 401.165 *et seq.* became law in 1949.<sup>1</sup> However broad the  
9 emergency powers granted to Defendant GOVERNOR may have been in 1949,  
10 Article X-A, § 6 narrowed them considerably, especially since the emergency  
11 powers granted to GOVERNOR cannot exceed the bounds of the Oregon  
12 Constitution. *See* Ex. “F.” If GOVERNOR is free to disregard the Oregon  
13 Constitution under the circumstances presented here – especially given that Article  
14 X-A prescribes a procedure that GOVERNOR is required to follow in  
15 circumstances like those presented here – then she and future governors may  
16 disregard it at whim so long as they claim to be doing so in the interest of  
17 preserving public health and safety.

18 67. Based on the foregoing, Plaintiffs respectfully request that the Court  
19 declare as follows:

- 20 a. Pursuant to Article X-A, § 6(1) of the Oregon Constitution, the  
21 state of emergency that Defendant GOVERNOR declared via  
22 Executive Order 20-03 on March 8, 2020, expired by operation of  
23 law on April 7, 2020, 30 days after GOVERNOR issued the order  
24 [*see* Ex. “G”].

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25  
26 <sup>1</sup> *See* [dilleradollar.wordpress.com/2020/04/24/governor-browns-emergency-orders-should-have-an-expiration-date/](http://dilleradollar.wordpress.com/2020/04/24/governor-browns-emergency-orders-should-have-an-expiration-date/).



- 1           b. The 60-day duration set forth in Executive Order 20-03 is  
2           unconstitutional on its face. Even assuming the 60 days will have  
3           already lapsed when the Court hears this matter, Article X-A, §  
4           6(2) of the Oregon Constitution effectively prohibits Defendant  
5           GOVERNOR from dictating or extending the duration of a  
6           catastrophic disaster via executive fiat. *See* Ex. “F.” GOVERNOR  
7           failed to follow the procedure set forth in Article X-A, § 6(2) to  
8           extend the state of emergency beyond the prescribed 30 days.
- 9           c. Executive Order 20-24 is likewise facially unconstitutional: Issued  
10          on May 1, 2020, Executive Order 20-24 extends the  
11          unconstitutional Executive Order 20-03 by an additional 60 days,  
12          to July 6, 2020, and does so without the required three-fifths  
13          approval of three-fifths of each house of the Legislature.  
14          Executive Order 20-24 is also unconstitutional because Defendant  
15          GOVERNOR failed to get the legislative approval required under  
16          Article X-A, § 6(2) within 30 days of declaring the emergency, and  
17          the prescribed 30 days had already lapsed by operation of law  
18          when GOVERNOR issued Executive Order 20-24.
- 19          d. All executive orders that Defendant GOVERNOR issued in  
20          furtherance of Executive Order 20-03, including and especially  
21          Executive Order 20-12, are invalid. Executive Order 20-12 is also  
22          unconstitutional, as it allows GOVERNOR to impinge  
23          constitutionally protected rights for as long as she sees fit – even  
24          after duration of the state of emergency set forth in her own orders  
25          has terminated. Even if GOVERNOR may temporarily infringe on  
26          constitutional rights in the face of a catastrophic disaster, she is not

1 free to infringe on them in perpetuity in the name of protecting  
2 public health and safety.

3 e. Based on the foregoing, CHURCHES are free to resume holding  
4 religious gatherings, and CHURCHGOERS are free to attend such  
5 gatherings.

6 **REQUEST FOR INJUNCTIVE RELIEF**

7 68. Plaintiffs refer to and hereby incorporate by reference the allegations  
8 set forth in Paragraphs 1 through 67 into this Paragraph as if fully set forth herein.

9 69. ORS 28.080 states, "Further relief based on a declaratory judgment  
10 may be granted whenever necessary or proper."

11 70. Plaintiffs have been irreparably harmed every day beyond April 7,  
12 2020, the date on which the state of emergency declared in Executive Order 20-03  
13 ceased to exist by law pursuant to Article X-A, § 1 of the Oregon Constitution.  
14 Specifically, pursuant to Executive Order 20-12, Plaintiffs have been restricted in  
15 exercise of religious freedoms protected under Article I, §§ 2 and 3 of the Oregon  
16 Constitution and the First Amendment of the United States Constitution.

17 71. Plaintiffs will continue to be irreparably harmed every day that  
18 Executive Order 20-12 remains in effect.

19 72. Plaintiffs have no adequate remedy at law beyond injunctive relief  
20 prohibiting Defendant GOVERNOR from enforcing Executive Order 20-12 and  
21 any other executive orders that may impinge on Plaintiffs' constitutionally  
22 protected religious freedoms.

23 73. Plaintiffs can demonstrate a reasonable likelihood of success on the  
24 merits: Even if Defendant GOVERNOR is free to temporarily impinge on  
25 constitutionally protected freedoms for 30 days after declaring a catastrophic  
26 disaster pursuant to Article X-A, § 6(1), and even beyond that if she gets the

1 approval of three-fifths of each house of the Oregon Legislature within that 30-day  
2 timeframe, Plaintiffs can show that the 30-day period lapsed without GOVERNOR  
3 obtaining the required approval. Since GOVERNOR declared the current  
4 catastrophic disaster on March 8, 2020, that means GOVERNOR's orders have  
5 impinged on Plaintiffs' constitutionally protected rights every day since April 7,  
6 2020, and will continue to do so for as long as Executive 20-12 remains in effect.

7 74. Based on the foregoing, the Court should grant Plaintiffs injunctive  
8 relief – starting with a temporary restraining order, which Plaintiffs hereby request  
9 pursuant to Or. R. Civ. P. 79, prohibiting Defendant GOVERNOR from enforcing  
10 Executive Orders 20-12, 20-24, and any other executive order issued subsequently  
11 to, and seeking to implement, Executive Order 20-03.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:

14 **ON ALL CAUSES OF ACTION:**

- 15 1. A judicial declaration that Executive Orders 20-03, 20-12, and 20-24  
16 have expired by operation of law;
- 17 2. An injunction enjoining enforcement of Executive Orders 20-03, 20-  
18 12, and 20-24 against Plaintiffs;
- 19 3. Attorney's fees and costs associated with bringing and maintaining  
20 this action in accordance with the law; and
- 21 4. For such other and further relief as the Court may deem proper.

22 Dated: May 6, 2020

PACIFIC JUSTICE INSTITUTE

24     /s/ RAY D. HACKE    

25 Ray D. Hacke

26 Attorney for Plaintiffs

ELKHORN BAPTIST CHURCH *et al.*

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**VERIFICATION**

Under penalty of perjury under the laws of the State of Oregon, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to those matters, and as to such matters, the undersigned verily believes the same to be true.

Date: May 6, 2020



Tim Fisher  
Pastor  
Elkhorn Baptist Church