

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

AMERICAN HUMANIST ASSOC., AND)
KWAME TEAGUE,)
)
Plaintiffs,) **CASE NO. 5:15-ct-03053-BO**
)
v.)
)
FRANK L. PERRY, *et al.*,)
)
Defendants.)
)

DECLARATION OF KWAME TEAGUE

I, Kwame Teague, declare that the following is true and based upon first-hand knowledge unless otherwise indicated:

1. I am over the age of 18, suffer no cognitive disabilities, and am competent to testify to the matters set forth herein, all of which are based on personal knowledge.

2. I am a Secular Humanist and have considered myself to be a Humanist since at least 2011. I first formally requested that the N.C. Department of Public Safety (NCDPS) recognize Humanism as an official faith group in early 2012 using an Inmate Request Form to Chaplaincy Services. However, prior to that, on November 28, 2011, I wrote a letter to the Unit Chaplain, Oliver Muhammad stating in part: "how do I go about having Humanism recognized in the D.O.C. It is already recognized as a religion by the Federal Court: so my question is, how do I get it recognized by the Chaplain? Please let me know." *See* (A.870-871). I have consistently identified as a Secular Humanist since these initial requests and have never waived in my sincerely held Humanist convictions.

3. I was not informed of the DC-572 procedure by staff in response to these initial requests in 2011 and 2012, despite clearly asking staff about how to get Humanism recognized in NCDPS. Instead, I was told, repeatedly, that nothing could or would be done. It wasn't until much later, after I wrote to

Chaplain Brown, that she told me about the DC-572 form. This was after I was told nothing could be done.

4. Before converting to Humanism, and as discussed during my deposition in this matter, I was a Muslim and practiced the religion of Islam. I was raised Muslim and identified as such when I first arrived to NCDPS in 1996. I was a Muslim until I discovered Humanism sometime in 2010 and 2011.

5. NCDPS allows inmates to attend services for certain recognized Faith Group meetings and services even if they are not adherents of said Faith Groups.

6. Because NCDPS has not allowed me to meet with other Humanists, and refuses to approve Humanism as a recognized Faith Group, I sometimes attended Islamic group services. I have never attended those services because of any wish to continue to practice Islam. Rather, I felt comfortable with a number of the members attending those services, and Humanism teaches us that part of better understanding humanity is by engaging and learning from people of different backgrounds and viewpoints. Since converting to Humanism, I have never attended any Islamic service with the intent to revert to being a Muslim. Nor did attending any of those services change my own desire to continue to be a Secular Humanist.

7. In February 2013, I changed my status in OPUS to Buddhist because I believed Buddhism was the closest approximation to Humanism recognized by NCDPS. As I discussed at my deposition and interrogatory responses, it was the only option in the system that would allow me to identify with a nontheistic-based group of individuals for congregation and group purposes. I wanted to formally identify as a Humanist, and I wanted to attend Humanist meetings, and Buddhism did not reflect my actual convictions at that time, but NCDPS did not allow me to do so in the OPUS system. I was at that time in 2013, and remain to this day, a Secular Humanist.

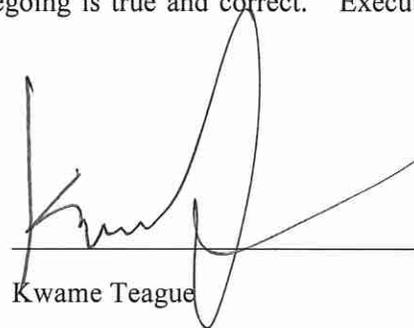
8. I also have attended other religious group services in an effort to better understand my fellow man including, for example, services for Christians, Wiccans, Rastafarians, Buddhists, and Moorish Science. I did this because one of the key tenets of Secular Humanism is to understand humanity, and hearing people discuss their differing views on religious concepts furthers my understanding of humanity and ability to empathize with persons of all faiths. Again, since converting to Secular Humanism, I never attended any of these other group services with any desire to convert to another religion.

9. Despite sometimes attending these other Faith Group meetings, as discussed above and during my deposition, I have been and remain to this day a Secular Humanist, and I still sincerely wish to study and discuss my Humanist beliefs and convictions with other Humanists that have similar convictions. If approved by NCDPS, I would attend Humanist group services and meetings.

10. I am currently barred from meeting with other Humanists for group study and worship services at the Nash Correctional Institution. In fact, I have never been allowed to meet with fellow Humanists in a group setting at any of the facilities where I have been incarcerated, including my current location at the Nash Correctional Institution.

11. I understand that the Five Percent Nation of Islam is considered a Security Threat Group (“STG”) by NCDPS. I believe NCDPS previously incorrectly identified, or “validated,” me as a member of the Five Percenters sometime in 1999-2000. To be clear, however, I have never affiliated or identified myself as a Five Percenter, i.e., a member of the Five Percent Nation of Islam. I also have never been a part of any Five Percenter group.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this the 15th day of September, 2017.



Kwame Teague