

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

No. 5:15-ct-03053-F

AMERICAN HUMANIST ASSOCIATION and
KWAME JAMAL TEAGUE,

Plaintiffs,

v.

FRANK L. PERRY, et al.

Defendants.

DECLARATION OF SAM GROVER

I, Sam Grover, certify, and state under penalty of perjury under the laws of the United States of America, as follows:

1. I am an attorney duly licensed to practice law in the United States.
2. I am an associate counsel for the Freedom From Religion Foundation (FFRF). I have been an attorney for FFRF since October 2013.
3. During the course of my employment, I have defended the rights of Humanist and atheist inmates seeking equal treatment in prison facilities. As part of that effort, I have communicated with both the Virginia Department of Corrections (DOC) and the South Dakota DOC, as well as inmates within both of those systems.
4. On February 23, 2016, I sent a letter to the Virginia DOC regarding an inmate within the state's prison system who was unable to form a study group for likeminded nonreligious inmates, including atheists and Humanists.
5. On June 22, 2016, in response to my letter of complaint and subsequent work with that Virginia inmate, the Virginia DOC approved Humanism as a religion and added it to its list of "Religions Approved to Operate in DOC facilities." Attached herein as Exhibit A is a true and accurate copy of the Virginia DOC's approved religion list that includes Humanism.

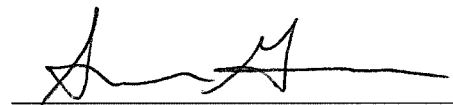
6. The Virginia DOC has an active Secular Humanist meeting group at the Coffeewood Correctional Center. Upon information and belief, the group has approximately thirty-five members. The Virginia DOC provides the Humanist Study Group a weekly timeslot. Attached herein as Exhibit B is a true and accurate copy of the Coffeewood Correctional Center's religious program schedule, which includes a Humanism Study Group every Wednesday from 11:00 am -12:30 p.m.

7. FFRF has donated eleven freethought books on how to be "good without God" to the Humanist Study Group at Coffeewood Correctional Center. There has been a similar demand for freethought literature and Humanist study groups at multiple prisons around the country.

8. The South Dakota Department of Corrections also recognizes and authorizes a "Secular Humanist Study Group" at the Mike Durfee State Prison. FFRF first wrote to the South Dakota DOC in May 2014 on behalf of an inmate who was seeking to form this group within the South Dakota State Penitentiary. After the inmate's transfer to the Mike Durfee State Prison, the Secular Humanist Study Group was ultimately approved in May 2017. The group had four members at its first meeting in June 2017, but the group has been growing rapidly since then. Approximately fifteen members participated at their most recent meeting in mid-August.

9. The Secular Humanist Study Group at Mike Durfee State Prison has been given a one-hour weekly time slot for group meetings in a small classroom. They have been allowed to establish two official secular holidays, which they will observe with special meals on February 12 (for Darwin Day) and September 17 (in honor of the signing of the entirely secular U.S. Constitution). They have also been designated a group account to which money can be donated for group events and the purchasing of reading materials. On August 22, FFRF donated eleven freethought books to this group.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this day of August 23, 2017.

A handwritten signature in black ink, appearing to read 'Sam Grover', is written over a horizontal line.

Sam Grover



Religions Approved to Operate in DOC Facilities

The following religious groups have been approved to meet in DOC facilities:

African Hebrew-Israelite
Asatru/Odinism
Buddhists
Christian Science
Church of Jesus Christ of Latter Day Saints/Mormons
Coptic Church
Druidry-Celtic
Eckankar
Greek Orthodox/Eastern Orthodox
Hare Krishna
Hindu
Humanism
Integral Yoga
Islam (Sunni Muslims, Shiite Muslims, World Community of Islam)
Jehovah's Witnesses
Jewish
Messianic Jews
Moorish Science Temple of America
Natsarim Israel
Nation of Islam *
Native American
Philadelphia Church of God
Protestants

- Baptists
- Church of Christ/United Church of Christ
- Episcopalians/Anglican
- Lutherans
- Mennonites
- Methodists
- Pentecostal (also known as Holiness, Apostolic, Charismatic, etc.)
- Presbyterians
- Quakers/Society of Friends
- Seventh Day Adventists

Rastafarians (must follow DOC grooming standards)
Roman Catholics
Santeria
Shetaut Neter/Neterianism
Temple of the Way-Out (of sin) Church
Wicca
Yahwists (House of Yahweh)

*Note- the following sects are not approved:

Five Percent Nation (Five Percenters)
Lost and Found Nation of Islam

If you have any questions or need more information, please contact the Operations Support Manager at 804-887- 8270.

CWCC
LAW LIBRARY



Coffeewood Correctional Center

Offender Name: _____ Number: _____
 Date: _____ Bldg/Bed _____

- Initial Assignment/Transfer – Submit within one week of completing facility orientation **YOU MUST**
 Change to Religious Services pass list – Submit during open enrollment period only **CHECK A BOX**

You may request enrollment in any of the below listed religious services or activities **within your Group and Subgroup only** unless otherwise specifically noted below. Additionally, Kairos Reunion may also be requested by all groups and subgroups listed below. Selections may not conflict with your mandatory programs, other religious activities or optional educational pursuits.

Selection(s) will remain in effect until you submit a revised *Request to Attend Religious Services* at the next open enrollment period. An open enrollment period of two weeks will be provided the first two weeks of January, April, July and October to allow offenders to change their selected religious service (including change of religion) by submitting a new *Request to Attend Religious Services*. If requests to attend specific services/activities exceed the capacity limits for the program, the program will be offered on a rotational basis only to allow equal access.

Offenders who miss five (5) consecutive services/activities without an approved excuse will be removed from that group's master pass list and will not be permitted to attend services/activities. Offenders who have been removed for attendance reasons may request to re-enroll during the next open enrollment period. Participation in holy day/season observances will be limited to those offenders who are on the master pass list for the associated religious group/subgroup at the time of the observance.

Add New	Remove Old	Group Subgroup	Service/Activity	Day	Time
Christian					
<input type="checkbox"/>	<input type="checkbox"/>	Protestant	Interdenominational Church Service (<i>General</i>)	Sun	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	Protestant	Interdenominational Church Service (<i>Charismatic</i>)	Mon	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	Protestant	Interdenominational Church Service (<i>Spanish</i>)	Wed	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	Protestant	Interdenominational Church Service (<i>Conservative</i>)	Thur	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	Catholic	Catholic Bible Study	Wed	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	Catholic	Catholic Service	Thur	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	LDS	Latter Day Saints	Fri	1100-1230
<input type="checkbox"/>	<input type="checkbox"/>	JW	Jehovah's Witness	Wed	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	JW	Jehovah's Witness	Sat	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	SDA	Seventh Day Adventist (<i>may also select Protestant</i>)	Fri	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	<i>All Groups & Subgroups may select</i>	Kairos Reunion (<i>monthly</i>)	3 rd Tues	1900-2100
Jewish					
<input type="checkbox"/>	<input type="checkbox"/>	Jewish	Messianic Jewish Service (<i>may also select either Traditional Jewish or Protestant</i>)	Fri	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	Jewish	Traditional Jewish Service	Fri	1900-2100
Muslim					
<input type="checkbox"/>	<input type="checkbox"/>	Muslim – Sunni	Taleem	Mon	1900-2100
<input type="checkbox"/>	<input type="checkbox"/>	Muslim - Sunni	Al-Jumu'ah	Fri	1300-1430
<input type="checkbox"/>	<input type="checkbox"/>	Muslim – NOI	Nation of Islam - Study	Tues	0930-1100
<input type="checkbox"/>	<input type="checkbox"/>	Muslim – NOI	Nation of Islam - Service	Wed	1100-1230
<input type="checkbox"/>	<input type="checkbox"/>	Muslim – MST	Moorish Science Temple – Study	Thur	0930-1030
<input type="checkbox"/>	<input type="checkbox"/>	Muslim - MST	Moorish Science Temple - Service	Fri	0930-1030
Other					
<input type="checkbox"/>	<input type="checkbox"/>	Asatru	Asatru	Fri	1100-1230
<input type="checkbox"/>	<input type="checkbox"/>	Wiccan	Wicca	Tues	1100-1230
<input type="checkbox"/>	<input type="checkbox"/>	Humanism (Secular)	Study Group	Wed	1100-1230

Offenders may submit this request by placing it in the institutional mailbox near the Dining Hall entrances.
 Processed by/date: _____ Date effective: _____