

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

Freedom From Religion Foundation,
Inc.,

Plaintiff,

v.

Case No. 9:12-cv-19-DLC

Chip Weber, Flathead National Forest
Supervisor; and

United States Forest Service, an
Agency of the United States
Department of Agriculture,

Defendants.

DECLARATION OF NORM DEFORREST

I, Norm DeForrest, declare under penalty of perjury that the following is true and correct:

(1) I am over 18 years of age and have personal knowledge of each of the statements in this declaration.

(2) I have lived in Kalispell for about sixteen years—ever since I retired.

(3) I have been a member of the Knights Columbus, Kalispell Council (No. 1328), for about five years.

(4) Shortly after I joined the Council, I worked with a group of Knights and Boy Scouts to paint the statue of Jesus at the Whitefish Mountain Ski Resort.

(5) I was asked to help because I have a bachelor's degree in art and do some work as an artist now that I am retired.

(6) I and a couple of other members of the Knights worked on completing the painting. One of the men assisting me set up scaffolding around the statue—which is approximately six feet tall and stands on a pedestal approximately six feet off the ground—so that we could reach the statue to paint it.

(7) It took us approximately two-and-a-half days to complete the work.

(8) In subsequent years I have assisted with touching up the paint and repainting the statue's left hand after it has been broken off and then repaired, which has happened several times.

(9) I served in the Air Force from 1956 to 1960, including overseas tours to Korea and Japan. I served for two additional years on inactive status.

(10) I have a deep respect for members of our military and particularly those men and women who have sacrificed their lives for our country.

(11) I view the statue largely in connection with World War II. I enjoy watching documentaries about World War II. I have been to Italy two times and have seen the kind of statuary in the countries and towns that inspired soldiers returning from the war there to erect the statue on Big Mountain in memory of their fallen comrades.

(12) The statue is a cultural symbol of our community, erected in commemoration of soldiers who fought and died in World War II.

(13) I have a strong interest in preserving this element of our local culture. That is why I have donated my time and skills to help maintain the statue.

(14) I believe my interest in seeing the memorial preserved is unique from any interest that the Forest Service might have in allowing the memorial to remain.

Executed on May 24, 2012.


Norm DeForrest