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SUPERIOR COURT OF WASHINGTON  
COUNTY OF BENTON

STATE OF WASHINGTON,

Plaintiffs,

v.

ARLENE'S FLOWERS, INC., d/b/a  
ARLENE'S FLOWERS AND GIFTS, and  
BARRONELLE STUTZMAN,

Defendants.

No. 13-2-00871-5  
(Consolidated with 13-2-00953-3)

DECLARATION OF BARRONELLE  
STUTZMAN IN SUPPORT OF MOTION  
FOR PARTIAL SUMMARY JUDGMENT  
ON CPA CLAIM BY INGERSOLL AND  
FREED

ROBERT INGERSOLL and CURT FREED,

Plaintiffs,

v.

ARLENE'S FLOWERS, INC., d/b/a  
ARLENE'S FLOWERS AND GIFTS; and  
BARRONELLE STUTZMAN,

Defendants.

1. My name is Barronelle Stutzman, and I am one of the named Defendants in this case. I am also the owner and operator of Arlene's Flowers and Gifts, the other named Defendant in this case.

STUTZMAN DECLARATION RE PSJ  
PAGE 1 OF 3

LIEBLER, CONNOR, BERRY & ST. HILAIRE  
ATTORNEYS AT LAW  
1141 North Edison, Suite C  
Kennewick, WA 99336  
(509) 735-3581

COPY

1 2. I am over the age of eighteen, competent to testify, and have personal knowledge of the  
2 information contained within this affidavit.

3 3. Robert Ingersoll has been one of my customers for approximately nine years, during  
4 which time I designed and created floral arrangements for him for many different occasions.  
5

6 4. I have enjoyed a warm and friendly relationship with Robert, knowing that he identified  
7 as gay and was in a relationship with Curt Freed.

8 5. The fact that Robert identifies as gay and was in a same-sex relationship never lessened  
9 his dignity or worth in my eyes, or the respect I gave to him as a longtime customer and friend.

10 6. In March 2012, Robert came to my shop to see if I would design the flowers for his  
11 wedding to Curt.  
12

13 7. I had designed and created flowers for Robert and Curt in the past, but I believe that  
14 doing the flowers for any same-sex wedding would give the impression that I endorsed same-  
15 sex marriage.

16 8. My deeply held religious belief is that God defines marriage as a spiritual union between  
17 one man and one woman.

18 9. As a matter of faith, I cannot go against God's definition of marriage or assist other's in  
19 doing so.  
20

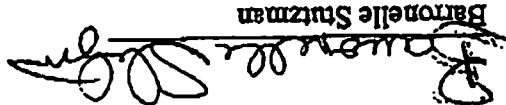
21 10. I believe that participation in same-sex ceremonies and using my artistic talent to design  
22 and create the floral arrangements that are an important component of weddings would go  
23 against God's definition of marriage.

24 11. Agreeing to do flowers for any marriage ceremony not between one man and one  
25 woman would violate my conscience and my deeply held religious beliefs.  
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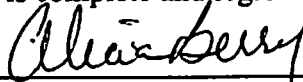
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12. I grasped Rob's hand and told him that I could not do the flowers for his wedding because of my relationship with Jesus Christ.  
13. Robert told me that he understood and asked for the names of other florists that I would recommend.  
14. I gave Robert the names of three nearby florists that I believed would be able to create arrangements for his ceremony: Lucky's Flowers, Shelby's, and Buds and Blossoms.  
Curt Freed was not present during this conversation and I have had no communications with Curt Freed regarding flowers for the wedding.  
DATED this 6th day of September, 2013.

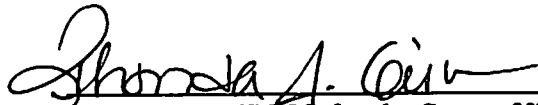
  
Baronne Stutzman

1 On September 6, 2013, I received the enclosed Declaration of Barronelle Stutzman from a  
2 known facsimile number. I have examined the document, determined that it consists of five (5)  
3 pages, including this affidavit, and that it is complete and legible.

4 

5 ALICIA M. BERRY, WSBA #28849  
6 1141 North Edison, Suite C  
7 Kennewick, WA 99336  
8 (509) 735-3581 (phone)  
9 (509) 735-3585 (facsimile)

10 SUBSCRIBED AND SWORN to before me this 6th day of September, 2013

11 

12 NOTARY PUBLIC for the State of Washington  
13 Residing at Kennewick

