

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
EASTERN DIVISION**

<p>BUSINESS LEADERS IN CHRIST,  <i>Plaintiff,</i>  v.  THE UNIVERSITY OF IOWA, <i>et al.</i>  <i>Defendants.</i></p>	<p>Civ. Action No. 3:17-cv-00080-SMR-SBJ</p> <p style="text-align: center;"><b>DECLARATION OF DANIEL BLOMBERG IN RESPONSE TO DEFENDANTS' MOTION</b></p>
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I, Daniel Blomberg, declare as follows:

1. I am legal counsel at the Becket Fund for Religious Liberty. I represent Business Leaders in Christ (“BLinC”) in the above-captioned matter.

2. On January 17, 2018, I accessed the website of the Iowa Memorial Union at the University of Iowa with regard to the cost of renting meeting rooms. I personally reviewed each of the following websites, and observed that they stated that the University allows registered student groups to reserve the rooms at no cost while charging members of the general public \$150 to reserve the rooms:  
<https://imu.uiowa.edu/event-services/meetings/wisconsin-room/> (Wisconsin Room);  
<https://imu.uiowa.edu/event-services/meetings/miller-room/> (Miller Room);  
<https://imu.uiowa.edu/event-services/meetings/kirkwood-room/> (Kirkwood Room);  
<https://imu.uiowa.edu/event-services/meetings/river-room-ii/> (River Room Two).

3. Also on January 17, I reviewed the following University websites regarding advertising for groups and events, and observed that they identified the following

benefits uniquely available to registered student organizations and/or University departments:

- a. **Digital Displays.** See <https://imu.uiowa.edu/event-services/contact-us/> (“Digital Displays are reserved for Registered UI Student Organizations and Departments only”); see also <https://imu.uiowa.edu/event-services/policies/digital-display/> (explaining that the displays are “slides [that] run on TV screens throughout the IMU building” and that “[d]igital displays are a designated public forum for registered student organizations and university departments”; website last updated Sept. 15, 2017).
- b. **Chalking.** See <https://imu.uiowa.edu/event-services/policies/chalking/> (“Chalking is defined as the marking of a surface with chalk in order to publicize an upcoming event sponsored by a registered student organization. . . . Only registered student organizations may chalk.”)
- c. **Ground Floor Displays.** See <https://md.studentlife.uiowa.edu/clients/imu-ground-floor-display-case-guidelines-and-policies/> (“Thank you for choosing to advertise your event using the IMU ground floor displays! We’re excited to promote your event and look forward to working with you! Registered student organizations and University departments are allowed to reserve display space on the ground floor of the Iowa Memorial Union (IMU). . . . This is a great opportunity to get the word out about your event for an

entire month and make students/faculty more aware of your student organization or department!”).

- d. **Information Tables.** See <https://imu.uiowa.edu/event-services/advertising-and-promotion/information-tables/> (“Information tables are provided so that registered student organizations and UI departments may make contact with students for the dissemination of information or to collect funds or other support (e.g., signatures, supplies) from persons outside its membership. . . . University guests or other non-university vendors or companies are not allowed at the information tables for sales-related, fundraising, or commercial activity without being sponsored by a registered student organization in good standing with the Center for Student Involvement and Leadership”).
- e. **Bake Sales.** See <https://imu.uiowa.edu/event-services/advertising-and-promotion/information-tables/bake-sales/> (“Registered student organizations are permitted to conduct bakes sales in the IMU at specified tabling areas or on Hubbard Park.”).
- f. **Hubbard Park Fence.** See <https://imu.uiowa.edu/event-services/policies/hubbard-park-fence/> (“Three (3) spaces are available on the Hubbard Park Fence for registered student organizations and university departments to hang signs and/or banners for the purpose of promoting special events or activities occurring on Hubbard Park or in the Iowa Memorial Union.”).

4. Also on January 17, I accessed each of the University websites listed below, all of which identified additional benefits available uniquely to registered student organizations.

a. **Subsidized space rentals.** <https://imu.uiowa.edu/event-services/policies/student-organizations/> (“Registered student organizations in good standing with the Center for Student Involvement and Leadership (CSIL) are eligible to reserve space and receive a subsidized rate for use of the space”). Examples of subsidized rates include:

i. The Danforth Chapel. See <https://imu.uiowa.edu/event-services/outdoor-spaces/danforth-chapel-2/> (free for registered student organizations, \$300 for the general public).

ii. The Sunporch. See <https://imu.uiowa.edu/event-services/spaces/sunporch/> (\$105 rate for registered student organizations, \$525 for the general public);

iii. The Black Box Theater. See <https://imu.uiowa.edu/event-services/spaces/black-box-theater/> (\$100 rate for registered student organizations; \$400 for the general public).

b. **University catering discounts.** See <https://catering.uiowa.edu/students> (“University Catering has a full menu for student organizations at a discounted rate. . . . Student

discounts are only offered to student organizations paying directly out of their student account.”).

- c. **Discounts on audiovisual equipment rental and University services.** See <https://imu.uiowa.edu/event-services/fees/> (listing dozens of discounts for student organizations on a variety of equipment and University services).
- **Rallies and demonstrations.** See <https://imu.uiowa.edu/event-services/policies/rallies-and-demonstrations/> (“Student Organizations may host a political rally or demonstration in Hubbard Commons, Hubbard Park, and/or the South Lobby entrance (departments or university guests may not conduct a rally or demonstration)”).

5. Also on January 17, I accessed the University’s OrgSync web site for registered student groups, <http://uiowa.orgsync.com/>. I was unable to find a page for BLinC. Using the “Browse Student Organizations” search bar on the website, I searched under “Business Leaders in Christ,” “BLinC,” and also under the “Spiritual & Religious” student-group category listed on the site.

6. On January 18, 2018, I accessed the University Housing & Dining Academic Year Room Reservation Policy for External Groups, which is available [http://cougar.its.uiowa.edu/extrmreq/rm\\_reserve\\_external\\_policy.pdf](http://cougar.its.uiowa.edu/extrmreq/rm_reserve_external_policy.pdf). The policy states that non-hall recognized student groups are subject to space rental fees and are also limited in how often they can rent space, when they can rent space, and the specific types of space that they can rent.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 18th day of January, 2018.

/s/ Daniel Blomberg  
Daniel Blomberg