UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

INDIANA CIVIL LIBERTIES UNION, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:00-cv-0811
	)	
MIKE BRAUN,	)	
	)	
Defendant.	)	

DECLARATION OF MATTHEW BROADWELL

I, Matthew Broadwell, do hereby declare as follows:

1. I am over the age of eighteen, competent to testify, and provide this declaration based on my personal knowledge.

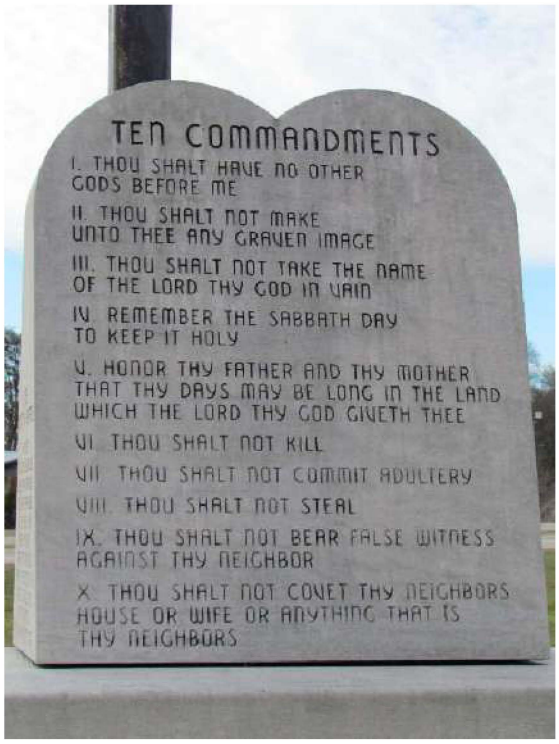
2. I am the Deputy Director of Investigations for the Indiana Office of Attorney General.

3. On December 22, 2025, I traveled to 2541 39th Street, in Bedford, Indiana 47421. This location is the 39th Street Christian Church. On the afternoon of December 22, 2025, I took photographs of all four sides of the monument at the above-described location.

4. This photograph (Photo # 1) shows a wide view of above-described monument.



5. This photograph (Photo # 2) shows the side of the monument containing text about the Ten Commandments.



6. This photograph (Photo # 3) shows the side of the monument containing text about the timeline of this monument.



7. These photographs (Photos # 4, 5, 6 and 7) show the side of the monument containing text about the Bill of Rights. Photo # 4 is a wider view with photos 5, 6 and 7 showing zoomed in sections of the text.

Photo # 4



Photo # 5

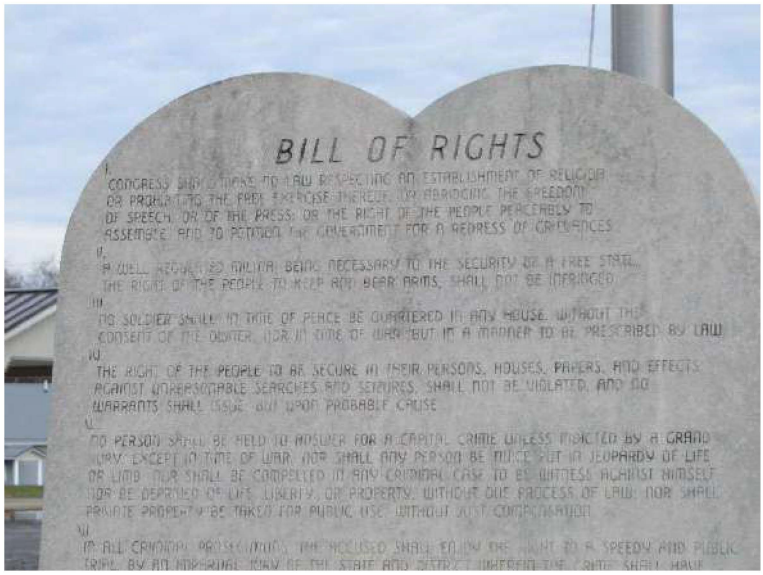


Photo # 6

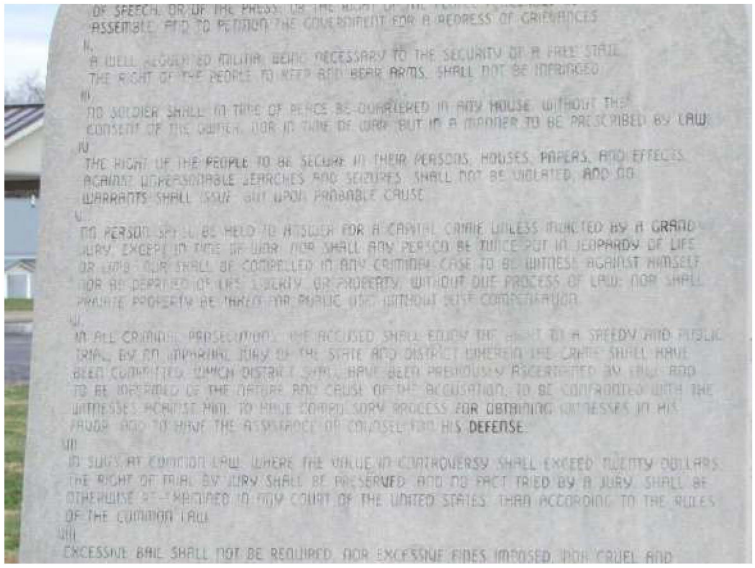
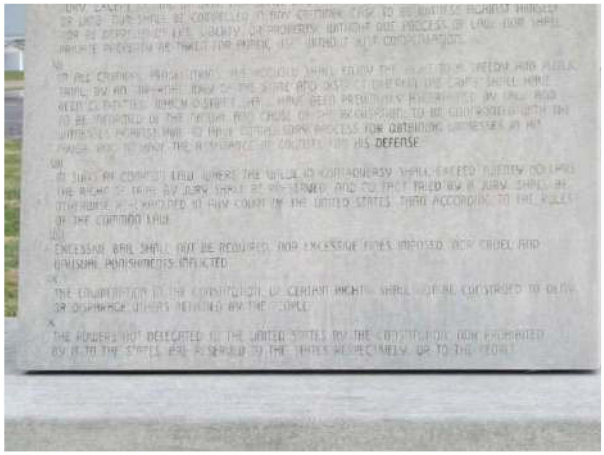
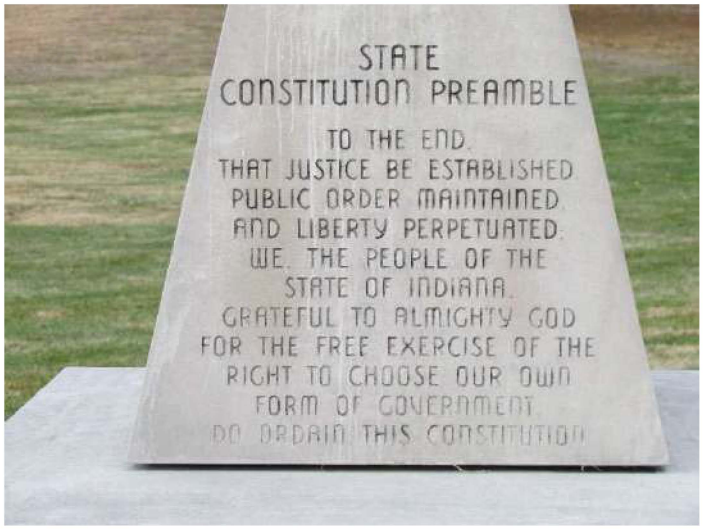


Photo # 7



8. This photograph (Photo # 8) shows the side of the monument containing text about the Preamble of the State Constitution.



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

Executed on December 23, 2025

Matthew Broadwell
Matthew Broadwell