IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF INDIANA

INDIANAPOLIS DIVISION

00-3011

INDIANA CIVIL LIBERTIES UNION,

VS CAUSE NO: IP-00-0811-C-B/S

FRANK O'BANNON, et al

DEPOSITION OF BRENT E. STEELE

TAKEN ON JULY 18, 2000

U.S.C.A.—7th Circuit
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The deposition of BRENT E. STEELE, produced and sworn before me, Christie A. Guthrie, a Notary Public in and for Lawrence County, State of Indiana, in the offices of STEELE STEELE McSOLEY & McSOLEY, Bank One, Suite One, 1602 "I" Street, Bedford, Lawrence County, Indiana, on the 18th day of July, 2000. This deposition was taken on behalf of the Plaintiff in a certain action now pending in the United States District Court, Southern District of Indiana, Indianapolis Division, as referenced hereinabove.

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LIST OF EXHIBITS

PLAINTIFF'S NO:	EXHIBIT:
1	Letter from Carpenter to Governor
2	Letter to Carpenter from Shrewsberry
3	Letter to Hirsch from Steele
4	Diagram by Hoosier Drafting
5	Diagram by Watterson
6	Diagram by Steele
7	Letter from Steele to O'Bannon w/attachments

BRENT E. STEELE, being first duly sworn to tell the truth, the whole truth, and nothing but the truth, deposes and says as follows, to-wit:

DIRECT EXAMINATION

QUESTIONS PROPOUNDED BY: KENNETH FAULK

Q. 1 State your name, please.

A. Brent Steele.

Q. 2 Your business address, sir?

A. Bank One - Suite One, 1602 "I" Street, Bedford, 47421.

Q. 3 You are a member of the Indiana General Assembly?

A. Yes, sir.

Q. 4 What district do you represent?

A. Sixty-five (65).

Q. 5 That compromises the City of Bedford, Indiana?

A. Parts of it.

Q. 6 How long have you been a Representative?

A. Since '94.

Q. 7 You're an attorney by profession. Is that correct?

A. Yes, sir.

Q. 8 How long have you been an attorney?

A. Since September of '72.

Q. 9 Now, I'm going to be asking some questions

concerning the Ten Commandments monument, which as I understand it, is going to be given to the State of Indiana and displayed on the Statehouse. Are you aware of that monument?

A. Yes, sir.

Q. 10 Are you involved with this monument in any way?

A. To some extent, yes.

Q. 11 How are you involved?

A. Well, sort of ramrodded a little bit to get it started on who would, if we could get a replacement for the one that was torn down, sort of spearheaded some people, got them fired up.

Q. 12 There was a monument that was on the, in the southwest area of the lawn of the Statehouse. Is that correct?

A. The way I understand it, yes.

Q. 13 That was destroyed a number of years ago?

A. Yeah, it appears to have been. I saw a letter that was written August the 7th of 1996 by Noel Carpenter. It was addressed to then Governor Bayh. He mentions that, he said "If my memory serves me correct the monument was given to Indiana in 1955 by the Fraternal Order of Eagles and inscribed with the Ten Commandments." He said, "It's my understanding that one man, about

six (6) years ago, knocked it down," so that would have been around 1990, I guess, when it went down. I'm not exactly sure. Then he asks Governor Bayh to put it up, put it back up. Then there was a letter from William Shrewsberry a few days later, eight (8) days later, August the 15th of '96, and he said, "It is our intention to have the monument restored and in place before the end of this Administration." Now, I didn't know those letters then existed. I think my first contact was what I read in a Star article that there was a movement to try to get the Ten Commandments restored. They said there could be a reproduction of this monument in granite, and I think that's what probably fired me up. Then around November the 19th, 1997, I was making phone calls to the Indiana Limestone Institute to get it, see if we could do something in limestone, because granite sort of offended me.

Q. 14 Granite is not from Indiana, I assume.

A. No. My family had been involved in the stone industry, my dad had, and it's an integral part of our society here in Lawrence County, and we teach it in our, stone carving in our schools,

so we still take it pretty seriously. So I called the Limestone Institute and said "Why can't we do something in limestone?" and that's sort of how it started.

Q. 15 May I see the documents you're reading from?

A. Uh-huh. (Yes) I made copies.

(DOCUMENTS PROVIDED TO MR. FAULK)

Q. 16 Could I see the copy of the letter you wrote then?

A. Sure. I wrote to Stuart Hirsch, who was a staff writer for The Indianapolis Star, and advised him that we, I'd already made arrangements to get the stone donated, that we could do it for significantly less than the Eight Thousand, Eight Hundred Dollar ($8,800.00) cost that was projected in The Star. I said it would be donated stone, that we'd have the best carvers put to it, and it would be a gift basically.

(DOCUMENT PROVIDED TO MR. FAULK)

Q. 17 The Limestone Institute is an umbrella group of the various limestone companies operating in this area. Is that correct?

A. Yes. The Indiana Limestone Institute is an organization that is essentially designed to put the stone industry forward. It represents not

one, but maybe like seventy (70) different mills and quarries, and if there was a major construction project going on in Washington, DC or in the National Cathedral, or other places, they're the ones that sort of put the best foot forward of the industry. "We've got carvers, we can do this, we can do that." Then based on what skills are needed or what kind of stone work is needed, they can come back and tell the different quarries and manufacturers that they might want to bid on a particular job, because not all manufacturers can do the same thing. For example, those pillars there, that's a picture of the Town of Bedford, and it was done probably in the 20s, from the looks of the cars. There's a picture out there on the front wall of our law office of my dad standing on one of those pillars. He used to work in one of those quarries doing that. Some quarries can do that, some can't. Some can manufacture sills and lentils and stuff like that, but they don't do pillars. So, based on your craftsmen and the kind of lathes or tools that you have available, you can do different jobs.

Q. 18 I'm just going to mark these as "Exhibits 1"

through "3", "Exhibit 1" being the first letter from Noel Carpenter, "Exhibit 2" being the response letter from Bill Shrewsberry, who was with Governor Bayh's office, and "Exhibit 3" being your letter to The Star as well as to George Hall.

A. Okay.

Q. 19 So, you basically talked to the Limestone Institute and got people who were willing to manufacture a monument to be placed onto the Statehouse. Is that correct?

A. Right.

Q. 20 It's your understanding it's going to be placed where the old monument was?

A. In the area.

Q. 21 Do you know exactly where it's going to be placed?

A. No.

Q. 22 That's not your decision, I assume.

A. Well, I guess it would be mine. I've got to figure out where to put it, but.. First of all, we didn't do anything. Nothing happened for a couple years after that. This all sort of fell into quietness and never heard back from anybody and nobody from the State or anybody said,

"Yeah, let's do this," so I just sort of forgot about it. I guess this last Legislative session, when Denbo had his Ten Commandments bill, it fired it up again, and that's when I started working on it again. If you go out to the lawn and look in the, it'd be the southwest quadrant of the Statehouse, there's about an eighteen inch (18") by seventeen foot (17') concrete pad, and from the looks of the picture of the original monument that was dedicated by the Eagles in '55 or thereabouts, it was about a four inch (4") thick monument. Apparently someone pushed it over or got a car up on the lawn and knocked it over. When it landed, it broke and it was epoxyed apparently. I didn't realize it had even existed. I'd never seen it since I'd been at the Statehouse. I heard that it was in the basement of the Statehouse. Come to find out, the, and I didn't want some bolexed piece of limestone, all damaged and chipped and with a bunch of epoxy on it, that wouldn't look very good, and I thought, well, you know, we could make something new, cheaper, faster and better than even messing with the old one. Come to find out, the original sat in a warehouse on

the west side of Indianapolis. The Eagles had gotten ahold of it, found out, and I don't know how, it was there, went to the warehouse and picked it up, took it back to Anderson, and I got a picture here that someone sent me that said it was rededicated on June 7th of 1998, so a couple years ago somebody put it up back in Anderson. I called Anderson to see if they wanted to give it back to the State of Indiana. I talked to the head of the organization. The reasons that Anderson, I was told, was Anderson was the first Eagles Lodge in the state of Indiana, it's called "The Mother's Lodge" and they thought it ought to go back there. They said, no, that they had fixed it and it was back there and they weren't interested in seeing it get destroyed again. I told them that I had had plans for a pretty, nice, I think a beautiful monument, and I would put on there that it was replacing the one that was originally given by the Eagles in '58 and they said that would be all the kudo that they would want, or recognition that they would want, and they thanked me for that and that was it.

Q. 23 You indicated that you were going to decide

where it would be placed on the Statehouse lawn. How are you going to make that decision?

A. Where it fits. It doesn't fit on a seventeen inch (17") by seventeen foot (17') piece. I wouldn't want to try to balance it, so I guess I'll try to get as close to the original site, but not sit it on that piece.

Q. 24 But it will be close to that site?

A. I would assume.

Q. 25 Is it going to be illuminated, do you know?

A. Not that I know of. Anymore than what, there's just a lot of natural illumination from the big Statehouse lights that have been put in, so it's really bright in there.

Q. 26 Sure. Where is the monument actually being made?

A. Well, it's being made at the Evans Stone Quarry out here.

Q. 27 It's my understanding from talking to Mr. Laramore, that although the actual stone has been cut, it has not yet been engraved. Is that correct?

A. It's not even, I talked to one of the men at Evans this morning, and it's still just a lump of stone. It's not even carved yet.

Q. 28 Who is actually paying for the cost of fabricating the monument?

A. It's all being donated. The stone was given by Elliott Stone Company. The shaping of the stone to whatever it ends up will be donated by the Evans Quarry, er the Evans Mill, I'm sorry. The lettering is being donated by Watterson Monument. The trucking will be donated. I'll find someone. I've had several men call me and say they'd be glad to donate their trucks and..

Q. 29 To take it on up and install it?

A. ..to take it up. I don't know that anybody's got a dime in it yet.

Q. 30 When do you believe it will be ready or be completed?

A. Well, it's hard to say. This is a rough estimate because the mill.. They're doing this in their spare time. The mills have shut down. In the first two (2) weeks of July they always shut them down and let all the people have a vacation at the same time. At that point in time they go in and do maintenance on the bearings and all this kind of stuff and then they crank back up. I guess, he said today he thought they could have it done by August the

15th. That would be rough. Right now he said it's still a block of stone.

Q. 31 Then once you're notified of that you will coordinate getting it up to Indianapolis?

A. Yes.

Q. 32 Are you working with anyone at the Governor's Office in terms of coordinating where it's going to be placed and when you're going to place it there?

A. No.

Q. 33 Are you planning to? Or are you just planning to deliver it when it's ready?

A. Well, I figured if I set it as close to where the old one was I wouldn't be doing anything wrong. No one has said "Don't do anything," or "Do do anything."

Q. 34 It's my understanding from the Governor's press release that he's accepting this donation for the State of Indiana. Is that your understanding?

A. Yes.

Q. 35 Is there going to be some sort of ceremony when it's delivered? If you know.

A. I haven't even gone that far. I guess I could get real grandiose and start imagining all kinds

of things. I've been imagining a lot of stuff on this anyhow. I might get Charlton Heston to come in and say Moses put it up, I don't know.

Q. 36 But at this point you have no set plan?

A. No.

Q. 37 The only information I have from the Governor's Office is that initial press release that says the monument is going to be four feet (4') high, five feet (5') wide and four feet (4') deep. Is that...

A. I can't even tell you. It's been everywhere. My original idea, I came up with some ideas just thinking. You've got to realize that.. To give you an idea, this is a picture that I took of a monument in our Greenhill Cemetery. We have a lot of carvers who do all kinds of carving. So I was trying to think of a base, I wanted a base. So I just came up with an idea and jotted it down and threw it on a piece of paper and sent it to Jan Watterson. That was what I first came up with.

Q. 38 Jan Watterson is?

A. He's a friend of mine that I bird hunt with and have been in business with down in Scottsburg, Indiana. He's Watterson Monument Service.

He'll be doing the lettering. He put together this initial picture. I wanted a free-flowing or a rough stone back. I wanted it to look like it was coming up out of the stone. He dressed it up a little bit and came up with this version. But that's not what it looks like, because when I started looking at some of the cases on this, I looked at the Colorado case, I think it was called the State of Colorado and the Freedom from Religion case that was..

Q. 39 Uh-huh. (Yes) The Colorado Supreme Court case.

A. It was a '95 case. It talked about other things being carved on it. So I needed another surface plane.

Q. 40 So originally you were going to have the Ten Commandments and then you decided to add other things so you needed more...

A. I needed another surface area. So then Hoosier Drafting, here in Bedford, who had originally, was going to draw this up, I called them and I said, "I need another surface area. Can you think of another way to redesign this thing, cause I'm out of ideas." I said, "This is your bailiwick, not mine. It's your gift. Why don't you do it?" They said that they were going to

give a gift that would not look free. They said this would be beautiful and when the State of Indiana gets it, it'll not look like something that was just given free, it'll look nice. They came up with that double surface plane, which...

Q. 41 Which is where we pretty much are. Is that correct?

A. It's essentially there. Although now, it's very hard to get the Bill of Rights, because of the number of words, and every time you expand it by an inch in any direction you're talking about a lot of weight. It's even larger than this. It was, the dimensions on this were, what is that, sixty-four inches (64")?

Q. 42 Uh-huh. (Yes)

A. Across the base it's bigger than that now, because you just, Jan Watterson said, "I cannot," the way you put a letter on, and I don't know this, but this is what I've been told. The way you put a letter on this thing is they cut a rubber die and it is done by computer and they lay this rubber sheet, they glue it to the face of the stone. Wherever there is a letter there's an empty space. It actually cuts the letter out of the rubber die. Then they go

back and forth with a sandblaster and it eats away the letter and then they peel the rubber off and clean the stone and you're left with the letter. I was, it's done to, I think, a five-eighths inch (5/8") tall Gothic letter now. That's, so that's about as small as you can get it and make it easily readable in stone. You can't carve, granite you can go very, very small. Limestone, due to the fact that it has a tendency to flake and chip, you would lose the centers of your Es and your As and any letter that has a, an enclosure, like a small A or... You've got to have some size or you'll have sloppy letters. So to make a clean cut I had to stick with about five-eighths (5/8), which means I had to expand the size, or they had to expand it. They said, "We're going to have to make it bigger." I said, "Well, you're the ones getting the stone, I don't care. Elliott doesn't care. Stone is cheap around here," so getting more stone was not a problem.

Q. 43 Let me introduce... Is this a copy?

A. Yes, these are all copies.

Q. 44 ...as "Exhibit 4", just, I understand the dimensions aren't correct, but let's talk about

that for a second.

MR. LARAMORE: Can I ask a clarifying question about the exhibits?

MR. FAULK: Uh-huh. (Yes)

QUESTION PROPOUNDED BY: JON LARAMORE

Q. 45 Did you indicate that on, I was making notes when you said this, so I'm not sure if you were pointing to something, did you indicate that somewhere on one of these there actually is an example of a five-eighths inch (5/8") Gothic letter?

A. Yeah. The way it should space out would be on, well, we don't have it marked. Why don't you mark the..

MR. FAULK: Let's mark this as "Exhibit 5".

CONTINUED DIRECT EXAMINATION: KENNETH FAULK

Q. 46 Let me clarify for the record, "Exhibit 5" was your first suggestion, which is not how it's going to look, but it does illustrate...

A. No, this really here is, if you want to mark this one "6", that was my first suggestion. "6" was my first, "5" was how Jan cleaned it up, Jan Watterson cleaned it up, and "4" is how Hoosier

Drafting cleaned up Jan's.

Q. 47 Now...

A. This is done on notebook paper. This is what Jan did to clean up my "6". Number "5" is a Watterson clean up of "6" and "4" is a Hoosier Drafting clean up of Watterson's "Exhibit 5". That doesn't have the back surface plane, it has the free-flow.

Q. 48 Back to "Exhibit 4", again, I understand the dimensions aren't necessarily how the monument will look.

A. No.

Q. 49 But this is the shape of the monument that is planned. Is that correct?

A. Right. It's just larger than that, I understand.

Q. 50 As I understand it, there is a base and then on that base is a solid piece of limestone with four (4) faces. Is that correct?

A. Right.

Q. 51 There are two (2) large faces and two (2) small faces. Is that correct?

A. Right.

Q. 52 This is going to be natural color, I assume.

A. Buff.

MR. FAULK: Let's go off the record for one second.

(BRIEF BREAK TAKEN)

CONTINUED DIRECT EXAMINATION: KENNETH FAULK

Q. 53 At the current time, could you give me an estimate of how large the base is going to be, the dimensions of the base of the monument?

A. This drawing here, and I'm looking, for the record, at the large blueprint drawing, which is the one I had sent to the Governor, it shows it as six foot four (6'4") across the front base.

Q. 54 That's six foot four inches (6'4") wide?

A. Uh-huh. (Yes)

Q. 55 And how high?

A. It shows the base as being two foot eight inches (2'8") tall to the, in the base, before the other piece. A total height of six foot eight (6'8") and a width of four foot four (4'4"), and it's my understanding that they were to, to get the letters on they were going to have to expand this tablet front. The tablet was three foot four (3'4"), and when you stuck the Bill of Rights on there, it looked pretty cramped. It was my understanding they were going to try to pick up another three (3) inches, which would be

an inch and a half (1 1/2") on each side, so it would be three foot seven (3'7"). When you did that it destroyed the balance, I mean, to the eye. It just didn't look proportional, so they were going to, by the same token, increase the base by three inches (3"), which would make it six foot seven (6'7") across the front and four foot seven (4'7") deep, so basically a three inch (3") expansion or growing of what you have here.

Q. 56 Let me just get this clear for the record then. The base, as we understand it, is going to be six feet six inches (6'6") wide and four feet seven inches (4'7") deep. Is that correct?

A. That's six foot seven (6'7").

Q. 57 Six foot seven inches (6'7") wide?

A. Uh-huh. (Yes)

Q. 58 And four feet seven inches (4'7") deep?

A. That's approximate.

Q. 59 And it will be approximately two feet eight inches (2'8") tall?

A. The base, yes.

Q. 60 And on top of that then we'll have the separate piece which will be four feet (4') tall?

A. It'll be, right here it shows it as four foot

one and three-sixteenths (4'1 3/16"), so it's probably about four foot four (4'4") now.

Q. 61 So it'll be four foot four (4'4") tall and about four foot four (4'4") wide. Is that correct?

A. No. At the base it would be less than that cause it doesn't, it would only be... Well, take nine (9) and nine (9), take eighteen (18) inches off of four foot seven (4'7"), it'd be about a foot and a half off of four seven (4'7"), it'd be about three foot (3').

Q. 62 It'll be about three foot (3') wide? This piece here.

A. If this is four foot seven (4'7") and you take eighteen (18) inches off of it, eighteen (18) inches is a foot and a half. Right?

Q. 63 Okay.

A. A foot and a half off of four seven (4'7") is about three one (3'1"), three foot one (3'1"), three foot (3') is approximate.

Q. 64 I'm confused and this is solely a function of my inability to do mathematics. The tablets themselves are going to be three feet seven inches (3'7") wide now. Is that correct?

A. At the base. They go up to the top. You're looking, if you would look at it from the side

you've got a mound this way and another mound. You're looking at this base here. It's wider at the base and comes up to six inches (6") at the top. It's six inches (6") thick at the top, but at the base it extends down, so it sits like a pyramid on the base. That way it can't be tipped over.

MR. LARAMORE: I think if there's some confusion here it might be...

MR. FAULK: Deep and wide.

MR. LARAMORE: Yeah, the use of, the confusion between deep and wide. I'm sorry.

MR. FAULK: My fault.

Q. 65 Again, I think we have the base dimensions. The monument dimensions, looking solely at the width of the face of the two (2) sides that have the tablet shape on them, that we're talking about there is three feet seven inches (3'7") wide. Is that correct?

A. Yes, sir.

Q. 66 The whole stone itself, I guess from any side, will be about four feet four inches (4'4") tall. Is that correct? The top.

A. That's close, yes.

Q. 67 Then in terms of it's thickness, that will vary because it's tapered on the top of the base stone. Is that correct?

A. It's my understanding it's still going to be six inches (6") thick at the top.

Q. 68 Tapering down to...

A. ..and tapering, or widening in a taper to about three foot (3') at the base.

Q. 69 I'm sure we're going to end up stipulating to all this, but we just have to make sure I understand it, or at least one of us in this room understands it. Then in terms of the content, I think we said this already, and I apologize to repeat myself, one of the large faces, which will be etched in tablet form, will contain the Ten Commandments; the other face will contain the Bill of Rights; the two (2) shorter sides will, one will contain the Preamble to the Constitution, and the other will contain something honoring...

A. Two (2) things. It says "This monument replaces the one donated by the Aeries and Auxiliaries of the Indiana Fraternal Order of Eagles on October 25th, 1958" and then below that, along the base

it will say "Gift of the Indiana Limestone Industry 2000 A.D." Then on the other side would be the Preamble to the Constitution.

Q. 70 I'm showing you what's been marked as "Exhibit 7". This is a copy, I believe, of a letter which you sent up to the Governor's Office. Is that correct?

A. Uh-huh. (Yes)

Q. 71 Does this, aside from the language on "Exhibit 4" concerning the gift of the Indiana Limestone Industry, does this accurately reflect the content of each side or each face of the monument as it's currently planned?

A. Well, it doesn't have the, I never have had a mock up of the Preamble to the Constitution, but it's all a matter of doing it on the computer, but yes.

Q. 72 The actual language "Gift of the Indiana Limestone Industry 2000" will be on the same side as the monument replacing "the one donated by the Aeries and Auxiliaries of the Indiana Fraternal Order of Eagles." Is that correct?

A. Yes.

Q. 73 You indicated that the lettering in the Bill of Rights portion of the monument, the actual ten

(10) Amendments will be five-eighths inch (5/8"). Is that correct?

A. Uh-huh. (Yes)

Q. 74 I assume the words "Bill of Rights" will be in larger letters.

A. Yes.

Q. 75 The lettering on the Ten Commandments portion of the monument, are you aware of what size that will be?

A. I think they said that approximated about an inch.

Q. 76 Again, we're talking about the language in the ten (10) separate Commandments, is that correct, will be about an inch high?

A. Yes.

Q. 77 Do you know how large the actual text, I'm quoting "Ten Commandments" at the top of the monument will be?

A. No. I've never seen a blueprint of that or a scale of that, other than it's larger than the rest of the wording in the pictures.

Q. 78 Do you know how large the lettering will be on the portion of the monument that indicates it replaces the prior one and also states it's a gift...

A. Not other than to make it balance. As you see, they try to make it fit. They'll expand it to whatever fits. I don't know that that's necessarily a five-eighths inch (5/8") or three-quarter inch (3/4") or what.

Q. 79 The same with the Preamble. Is that correct?

A. Yes.

Q. 80 On "Exhibit 7" there's, the version of the Ten Commandments is given and there is, in the text itself, there's some handwritten correction. For example, Commandment 2 now begins "Thou shall not," rather than "Thy shall not." Commandment 5 says, has an "in" inserted. Is this the actual text to the best of your knowledge?

A. Yes.

Q. 81 With the corrections. Is that correct?

A. Yes.

Q. 82 Just so I understand, and for the record, the Preamble to the Constitution that we're referring to, that will be on the monument is the portion of the Constitution beginning "We, the people of the United States, in order to form a more perfect union, establish justice, ensure domestic tranquility, provide for the

common defense, promote the general welfare, and secure the blessings of liberty to ourselves and our posterity, do ordain and establish this Constitution for the United States of America." Is that correct?

A. No. I was going to put the Preamble to the State Constitution. It's a gift to the State.

Q. 83 I'm glad we're having this talk. So the Preamble will now, to the State Constitution is, "To the end that justice be established, public order maintained, and liberty perpetuated, we, the people of the State of Indiana, grateful to Almighty God for the free exercise of the right to choose our own form of government, do ordain this Constitution." Is that correct?

A. Yes, sir.

Q. 84 I note, from my version of the Preamble, which was given to me by Attorney General Sendak, many, many years ago, portions of the text are in larger print than other portions. Are you going to repeat that in this monument?

A. I never had seen that before.

Q. 85 That just might be the edition. So to the best of your knowledge everything will be in the same type to the extent it's not capitalized?

A. I would assume God would be capitalized. Capital G, and I would imagine A would be capitalized.

Q. 86 Almighty God?

A. I don't know that the rest of the letters in the word "almighty" would necessarily have to be.

Q. 87 Who's going to be making that final decision for capitalization?

A. I don't know. I don't know. I guess it's how the computer spits this stuff out. You'll notice this is all capitals, so it may be the whole text is capitalized. I don't know what they find easy to carve, other than... I'm going to probably say that whatever the computer can cut on the rubber die the easiest. It could be that it's all... I notice there's no lower case letters. I'll give you my best guess. I'm not the one doing that. I'll say all caps, no difference.

Q. 88 As far as size of lettering is concerned, that's obviously going to be to fit. Is that correct?

A. Whatever fits.

Q. 89 Will it be identified as the Preamble of the State Constitution, or will it just say Preamble or...

A. I doubt if it even has a caption.
Q. 90 Are you aware there are different versions of the Ten Commandments?
A. Yes, sir.
Q. 91 It's my understanding that the version you picked is merely copying the version that was on the original monument. Is that correct?
A. Yes, sir.
Q. 92 You have copied that word for word to the best of your knowledge?
A. To the best of my knowledge, I have. I've not driven to Anderson and proofread it, and as you can tell, my little picture here isn't very good, but..
Q. 93 It's my understanding from our deposition so far, that you are the person who decided what was to be placed on the monument. Is that correct?
A. Yes.
Q. 94 How did you choose what was to accompany the Ten Commandments?
A. Well, I just sort of looked through that Colorado case and thought, well, I'll make it fit as much to the case as I can, give it my best shot, cause I knew somebody would be doing

something.

Q. 95 That's what happens. How do you choose the Preamble to the Indiana Constitution as opposed to the United States Constitution?

A. I'm in the state of Indiana and it's a gift to the State of Indiana, so I thought, I can't imagine, I didn't know anybody would think of something else.

MR. FAULK: I think we all did, but that's why we have Discovery.

MR. STEELE: That's why you're here.

MR. FAULK: Could we go off the record for a second?

(BRIEF BREAK TAKEN)

CONTINUED DIRECT EXAMINATION: KENNETH FAULK

Q. 96 It's my understanding then from your prior testimony that the monument was constructed after you read the Colorado Supreme Court case, which had approved of a Ten Commandments monument in a park near the grounds of the State Capital. Is that correct?

A. It was redesigned.

Q. 97 Your monument was redesigned to comply to the

contours of that case. Is that correct?

A. Yes.

Q. 98 Did you review any other cases before you...

A. I've read a lot of them.

Q. 99 Do you remember any of the ones you've read?

A. No. I've got them in a folder someplace. I don't even know where it is, but I have read a lot of them. I tried to read everything I could find on the Internet.

Q. 100 In the press release that Governor O'Bannon issued in March when he announced that he would accept the monument that you were fabricating, he indicated that "the Ten Commandments reminds us of our Nation's core values." You've indicated that you've read that press release.

A. Uh-huh, I've read that.

Q. 101 Do you agree with that?

A. Our Nation's core... Sure. I think it's more than that though.

Q. 102 What is that?

A. Do you want my personal view?

Q. 103 Yes.

A. I think it was in Romans, second chapter, 14, where they were talking about the Gentiles obeying the law even though they did not have

the written law. It said that they do it out of, it's a natural thing that comes out of their heart and out of their consciences know, their conscience tells them that it's just a natural thing for Man to know not to do certain things. So I think there's, I believe in my heart that people have a certain conscience that just comes with them. I don't know if it's spiritually given or genetically given or inbred or what, but I believe people know, from a very early age. When I watched my kids, I've raised four (4) boys, and I've watched them and they know when they're taking something from their brother. I think people know inherently it's wrong to kill. I don't think any man, if he were married, would feel good about stepping out on his wife. I think adultery is something he would feel ashamed of and he wouldn't go home and immediately announce he's done it. I think there are just certain things that our society, or we, as people, feel guilty about, or know is inherently wrong, or not good, or not providing for stability to ourselves and our marriages and our families and society. So I think there's just some natural rules that Man sort of

inherently feels, whether they're written down on a piece of paper or otherwise. That's just what I feel in my heart.

Q. 104 Obviously the Ten Commandments touches on something such as having no other Gods, keeping the Sabbath day holy, not making graven images. Are those all part of the core values that you believe?

A. That I personally believe?

Q. 105 Uh-huh. (Yes)

A. Yes.

Q. 106 Do you believe those are part of our Nation's core values?

A. Yes.

Q. 107 The Governor also indicated in his press release, and then I think he was speaking, I know he was speaking of the Preamble to the United States Constitution, but he noted that the Preamble and the Bill of Rights and the Ten Commandments all include ideals that we all need to be reminded of from time to time. Do you agree with that as well?

A. Yes, sir.

Q. 108 What are the ideals or the common ideals between the Ten Commandments and the Preamble, I guess

of the Indiana Constitution, and the Bill of Rights?

A. Well, to me, I don't think I would have the right to go into any place of worship unfettered. I don't think I'd have the right to stand up and say, if I were an Atheist, that I was an Atheist. I think the Bill of Rights and our governmental rules that we have developed, give people the right to say different things and assembly and to worship as we would desire. I think it would be impossible to have one without the other.

Q. 109 The Ten Commandments is a form of that worship that the Bill of Rights allows. Is that correct?

A. Well, a form of worship? I don't know that it's worship. I think it's...

Q. 110 A form of religious expression?

A. Religious expression. I don't know that it.. Yeah, I guess a form of religious expression would be okay.

Q. 111 As a lawyer I'm sure you're familiar with early codes of human behavior and conduct, like the Code of Hammurabai, for instance, which said things about not killing, not committing

adultery, for example. Are you aware of that?

A. Uh-huh. (Yes)

Q. 112 What is the significance of the Ten Commandments as a code of behavior in your personal opinion, as opposed to some of these earlier different codes?

MR. LARAMORE: I'm going to object to the question on relevance grounds, but I'm certainly not instructing him not to answer.

A. Well, whether you believe Moses actually came down off the mountain with it emblazed in stone, written by the finger of God, or whether you think he went up there and had a couple million Jews in the plain before him, which he was trying to get some order to and carved it himself, or whether you think it's just some rules that's good for society to live by, I don't know. I believe they are rules that are good for society to live by. I think even Rome thought they were rules. Whether you believe it was Jehovah God or whether you believe it was Caesar God, Caesar said you could only serve one (1) God and only wanted one (1), and if you went

against that you paid the penalty of death. So I think there are rules that every society, whether they quoted them as governmental or handed down by the Roman Senate or handed down by Moses or God or whoever, I think they're rules that have been good to live by.

Q. 113 I guess my question though is why the Ten Commandments? Why these rules?

A. I'd have to say why not these rules?

MR. FAULK: I don't think I have any further questions.

MR. LARAMORE: I do have just a few questions.

CROSS EXAMINATION

QUESTIONS PROPOUNDED BY: JON LARAMORE

Q. 114 I think we have an "Exhibit 7". Yes. Could I ask you to look at the last page, I'd like you to look at the last page of "Exhibit 7". Would you agree with me that there are two (2) different kinds of handwriting on that page? One in a darker ink and one in a lighter ink.

A. Uh-huh. (Yes)

Q. 115 Are you aware of whether all that handwriting was present when you sent the letter?

A. I couldn't tell you. I've gone through so many

versions of this, trying to make it fit, that I couldn't tell you that accurately. I know that the darker writing appears to be, I'd have to say is mine. I can't even tell you who wrote the "be subject for the same offense to". Are you talking about that?

Q. 116 Yes.

A. I have no idea who did that.

Q. 117 Were those lighter markings on there when you sent the letter, as far as you can remember?

A. To whom?

Q. 118 When you sent the letter to the... This was an attachment to the letter to the Governor.

A. To the Governor? I couldn't say. I don't know.

Q. 119 I think you said that the block of stone that will eventually be this monument, it is now at a mill called Evans.

A. Right.

Q. 120 Do you know who actually owns that, who would have title to that piece of limestone right now?

A. No. That's a good question. I don't.

Q. 121 You talked about doing the stone, doing the shaping, doing the lettering, doing the trucking. Will there also have to be preparation at the site of installation for this

monument?

A. Well, I would imagine you need to do something. Inasmuch as it's very, it's almost as wide as it is long, it wouldn't, I would have a tendency to think that its weight would be evenly distributed and wouldn't settle at an angle. The ground is level there and rather compacted, so I think it could probably sit and through the years it would sit reasonably level. I notice in all the graveyards around town they always put a concrete base underneath it and it probably would help prevent water to be sucked into it, groundwater, which would discolor it or a tendency to cause it to freeze and break. I would think it would need some concrete underneath it, just for, if nothing else, to keep it out of the water.

Q. 122 Would you assume that that could be donated also?

A. Oh, yeah. That's nothing.

Q. 123 Can you talk a bit more about what it was that motivated you or interested you in having a limestone monument put in place with this particular project?

A. Well, I saw the word granite, which, in the

Star, which sort of raised my attention, and the Statehouse is made out of Bedford limestone. In fact, I guess there's a block of limestone up in the third or fourth floor in one of those alcoves and it spins on a little plate, and it says "This building is built by Bedford limestone and is the official stone of the state," or something like that, by an act of proclamation or resolution of some Legislature in the past. So I decided, in my mind, that it was only fitting that granite wouldn't be the right thing and I wanted to give a chance for the limestone industry to showcase themselves a little bit. And we gave a gift of Washington Crossing the Delaware, I don't know if you remember that statue, that was carved by Mr. Arena here in town, and we gave that in 1976. Many of your monuments in Washington, DC are carved, and the Federal Building, the National Cathedral. It's all over the place and I just thought it would be fitting that we have some limestone in the yard instead of something else.

MR. LARAMORE: I don't have anything else.

REDIRECT EXAMINATION

QUESTIONS PROPOUNDED BY: KENNETH FAULK

Q. 124 Will you be contacting anyone at the Statehouse to make arrangements to put the concrete base down and for a date certain that you're going to be delivering?

A. I hadn't planned on it. I was just going to do it.

Q. 125 The day that you're going to do it, are you then going to put the concrete... How does that work? Do you need to erect the base or sink the base into the soil and level it before you put the monument on top?

A. Yes.

Q. 126 Obviously if I went to the Statehouse today and just started digging it up to put concrete down, someone from the Capitol Police Force would probably ask me what I was doing. Do you have some sort of arrangement already for permission to do this?

A. No.

Q. 127 But it's your understanding, at least from the Governor's press release, and I guess your communication with his office, that the Governor is going to be accepting this gift in whatever form it comes. Is that correct?

A. Right. I didn't think anybody would stop me, or if they did I'd say "Why don't you talk to somebody. I thought I could do this."

Q. 128 And roughly, just so we can have this, how heavy is the monument going to be?

A. Estimated eleven thousand, five hundred (11,500) pounds. About five (5) tons.

Q. 129 That's both blocks?

A. Total.

MR. FAULK: Thank you very much. I have nothing further.

AND FURTHER DEPONENT SAITH NOT.

(SIGNATURE WAIVED)
BRENT E. STEELE

STATE OF INDIANA)
) SS:
COUNTY OF LAWRENCE)

I, Christie A. Guthrie, a Notary Public in and for the County of Lawrence, State of Indiana, do hereby certify that BRENT E. STEELE, the deponent herein, was by me first sworn to tell the truth, the whole truth, and nothing but the truth, in a cause of action now pending in the United States District Court for the Southern District of Indiana, Indianapolis Division, and that the foregoing deposition was taken on behalf of the Plaintiff in the offices of STEELE STEELE McSOLEY & McSOLEY, Bank One - Suite One, 1602 "I" Street, Bedford, Lawrence County, Indiana, on the 18th day of July, 2000; that said deposition was taken down by means of recording and afterwards reduced to typewriting by me, and that the signature of the deponent was waived by the parties; that the Plaintiff was represented by counsel, Kenneth Faulk and E. Paige Freitag and the Defendants were represented by counsel, Jon Laramore.

I do further certify that I am a disinterested person in this cause of action; that I am not a relative or attorney of either party, or otherwise interested in the event of this action, and am not in the employ of the attorneys for the respective parties.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 18th day of July, 2000.

Christie A. Guthrie
Notary Public
A Resident of Lawrence Co., IN

My Commission Expires:

December 17, 2001

P BAYH



Infantry

Extended Page



Artillery

Randolph County Assessor

"Blessed is the nation whose God is the Lord;" Psalms 33:12

Noel (Bud) Carpenter * 584-0399 *Courthouse * Winchester, IN 47394

August 7, 1996

Dear Governor,

I'm writing in regard to the big monument that stood on the south lawn of the Statehouse until about four years ago. If my memory serves me correctly, it was given to the State of Indiana in 1955 by the F.O.E.. Inscribed on the stone are the Ten Commandments.

My understanding is that one man, about six years ago, knocked it down. The state put it back up and then he drove his car into it.

Several years ago, in the late 70's, I was a new Christian. Your Mother and Jimmy Carter's sister appeared on several Christian TV programs. Your Mother had a strong testimony for the Lord and was a big influence on me. I'm sure your Mother's strong values have guided you also.

You have been a great Governor for the State of Indiana. To my knowledge, in all of the decisions you have ever made, you have never done anything to go against Godly principles.

You are about to close out your marvelous time as Governor of the State of Indiana. I was wondering if, before you close out your term, you could see to it that this stone be restored to the Statehouse lawn.

It was the right thing to do in 1955 and it would be the right thing to do in 1996.

This could possibly be the greatest and most longlasting thing, in God's eyes, that you could ever do as Governor--and one day you, me and your Mother can celebrate this great decision with our Lord.

May God shine bright on the rest of your term in office and on your plans for the future. God bless you and your wonderful family.

Sincerely,

Noel B. Carpenter

PLAINTIFF'S DEPOSITION EXHIBIT 1

PENGAD-Bayonne, N. J.



"On fame's eternal camping ground their silent tents are spread, and glory guards with solemn round the bivouac of the dead."

Winchester, Indiana
Soldiers & Sailors Monument
1861-1865



Navy

402 West Washington Street, Room W479
Indianapolis, Indiana 46204

August 15, 1996

Mr. Noel B. Carpenter
Courthouse
Winchester, Indiana 47394

Dear Bud:

Thank you for your kind letter and comments of August 7, 1996. Governor Bayh asked that I extend his appreciation for your generous comments regarding his mother and his tenure as Governor. The Governor asked that I review your letter and reply directly to you since the Department of Administration has been working on restoring the Ten Commandments statue.

The Ten Commandments monument to which you refer was, unfortunately, vandalized on more than one occasion. The guilty party was apprehended and brought to justice. The Department of Administration is currently working with several individuals and legislators that are interested in refurbishing the monument and once again placing it on the State House lawn. Currently, we have assembled photos and other information necessary to replicate the monuments as close as possible to the original design. It is our intention to have the restored monuments in place before the end of this Administration.

Again, thank you for your enjoyable letter. If I can be of further assistance or if you have additional ideas that would be beneficial in completing this project, please do not hesitate to contact me.

Sincerely,

Bill

William Shrewsberry
Commissioner

WLS/mc



STATE OF INDIANA
HOUSE OF REPRESENTATIVES
THIRD FLOOR STATEHOUSE
INDIANAPOLIS, INDIANA 46204

BRENT STEELE
R.R. # 10, BOX #25
BEDFORD, IN 47421

DURING SESSION:
ROOM 336-A, DESK 69
STATEHOUSE
INDIANAPOLIS, IN 46204
317-232-9764

1997-98 COMMITTEES:
FINANCIAL INSTITUTIONS
COURTS AND CRIMINAL CODE
JUDICIARY – VICE CHAIRMAN
NATURAL RESOURCES

1 Steele McSoley
Bank one one
1602 1st.
Bedford
47421

November 19, 1997

Stuart A. Hirsch
Staff Writer
Indianapolis Star
307 N. Pennsylvania
Indianapolis, IN 46204

George Hall
c/o Church of the Good Shepherd/
Ten Commandments Ministry
P.O. Box 261
Auburn, IN 46706

Gentlemen:

I read with interest in the Indianapolis Star the article concerning the Ten Commandments and their eventual reproduction on granite for a cost of approximately $8,800.

Not knowing the eventual decision of our Supreme Court on this, and assuming we, as a State, will have the foresight to allow the Ten Commandments to be posted in public buildings, and coming from the Lawrence and Monroe County area, which is known worldwide for its limestone, I have been advised by the Indiana Limestone Institute that they will produce stone for the reproduction of the Ten Commandments, and will have it carved for significantly less than the $8,800 cost. They wanted me to pass this word on to you.

The stone would be donated stone, high grade, select buff--the best there is available. The minimum cost will come from finding skilled craftsmen to carve the stone. This will be no particular problem in view of the number of men and women in our community who possess these skills.

I am offering this merely as a suggestion, and offer it on behalf of the Indiana Limestone Institute. If you would like to take them up on this, please contact Jim Owens, Executive Director, at the:

Indiana Limestone Institute
Suite 400, Stone City Bank
Bedford, IN 47421
812-275-4426/812-279-8682

812-279-3513

Sincerely,

Brent Steele

BES/j
L-1119hh.bes

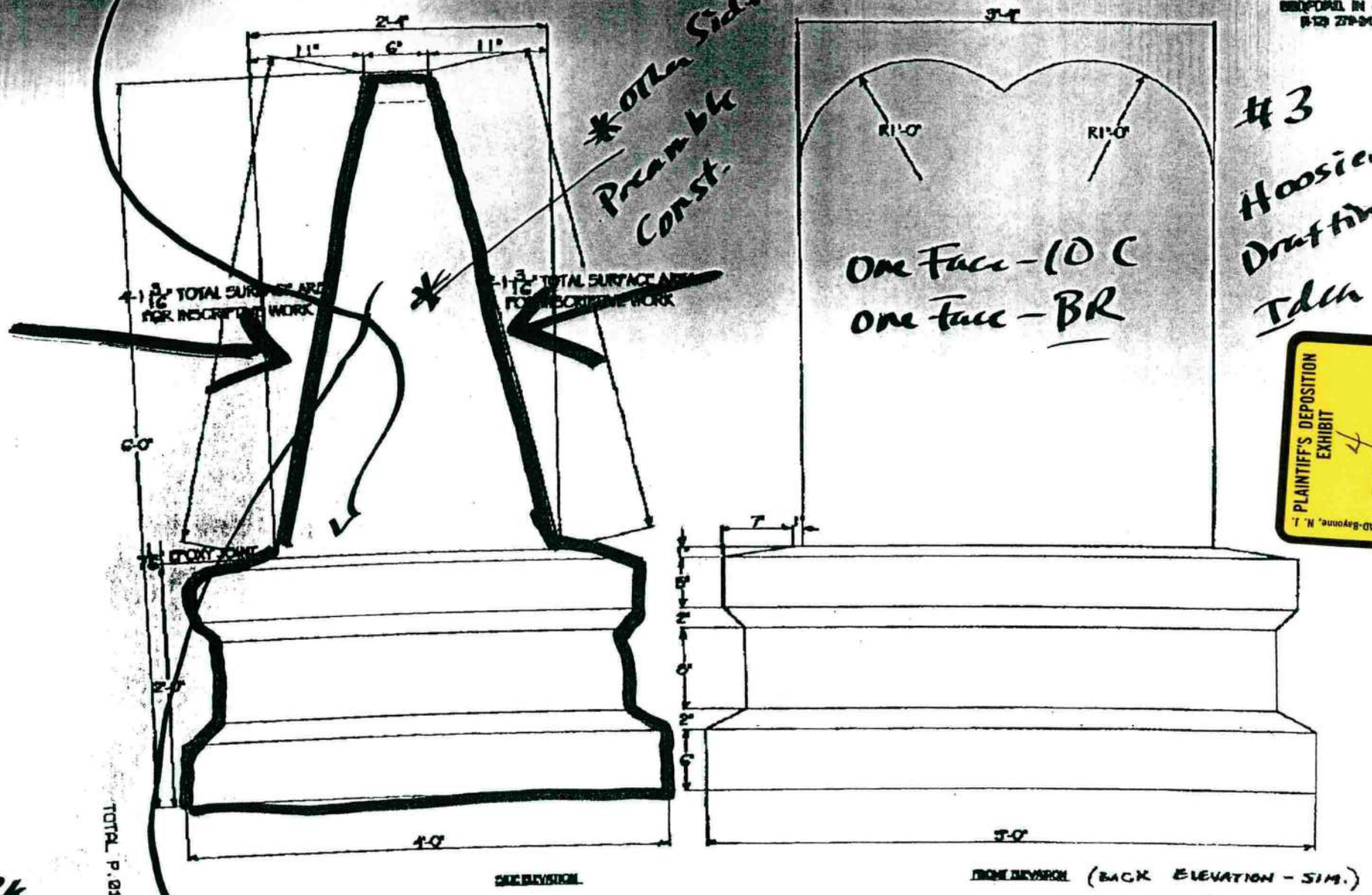
PAID FOR BY BRENT STEELE AT NO EXPENSE TO TAXPAYERS

PLAINTIFF'S DEPOSITION EXHIBIT 3
PENGAD-Bayonne, N. J.

STATE OF INDIANA
DEPARTMENT OF ADMINISTRATION

"Gift of The Indiana Limestone Industry - 2000 AD"

HOOSIER DRAFTING
1600 14th STREET
BEDFORD, IN 47421
(812) 279-2429



* Other Side Preamble Const.

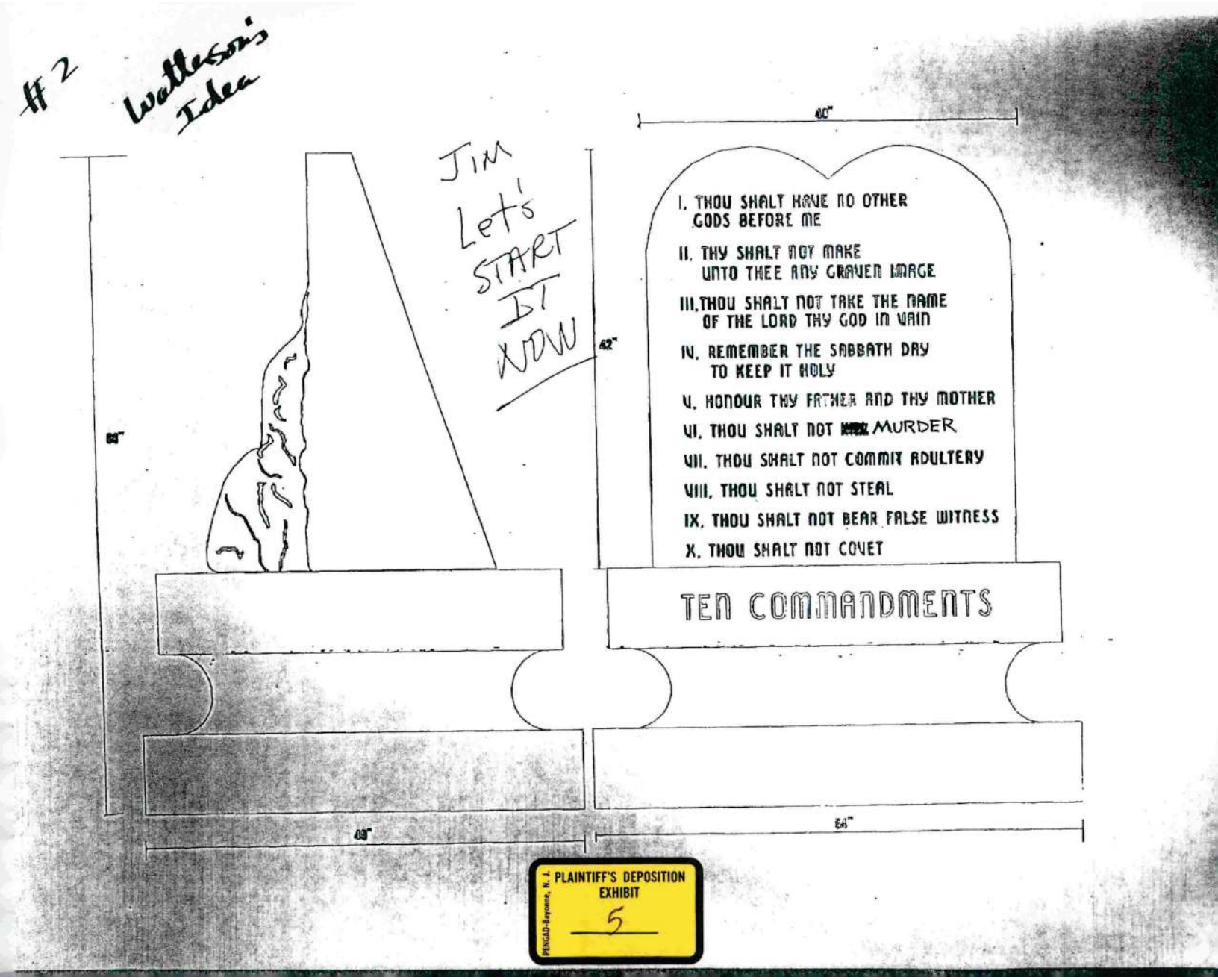
One Face - 10 C
One Face - BR

#3 Hoosier Drafting Idea

PLAINTIFF'S DEPOSITION EXHIBIT 4
PENGAD-Bayonne, N. J.

"This monument replaces the one donated by the Aeries and Auxiliaries of the Indiana Fraternal Order of the Eagles on October 25, 1958"

Ok
John R Moore
STATE
Conductor 3/3/2000


#2
Wallesons Idea
Jim
Let's START IT NOW
I. THOU SHALT HAVE NO OTHER GODS BEFORE ME
II. THY SHALT NOT MAKE UNTO THEE ANY GRAVEN IMAGE
III. THOU SHALT NOT TAKE THE NAME OF THE LORD THY GOD IN VAIN
IV. REMEMBER THE SABBATH DAY TO KEEP IT HOLY
V. HONOUR THY FATHER AND THY MOTHER
VI. THOU SHALT NOT MURDER
VII. THOU SHALT NOT COMMIT ADULTERY
VIII. THOU SHALT NOT STEAL
IX. THOU SHALT NOT BEAR FALSE WITNESS
X. THOU SHALT NOT COVET
TEN COMMANDMENTS
PLAINTIFF'S DEPOSITION EXHIBIT
5

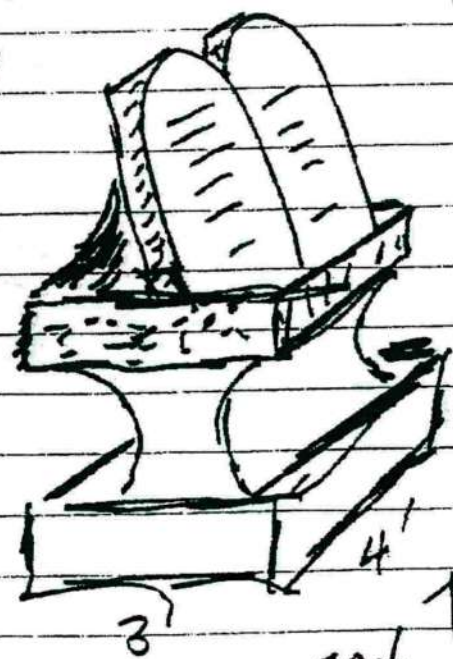
Steele

high / 5' perhaps

One piece

or 50

4½'



FAX TO JIM & JAN

#1

Steele's Idea

PENGAD-Bayonne, N. J.
PLAINTIFF'S DEPOSITION EXHIBIT
6

STEELE, STEELE, McSOLEY & McSOLEY
ATTORNEYS AT LAW
BANK ONE - SUITE ONE
1602 I Street
Bedford, Indiana 47421

RUEL W. STEELE (1908-1992)
BYRON W. STEELE
BRENT E. STEELE
PATRICK S. McSOLEY
DARLENE STEELE McSOLEY

Telephones:
Area Code 812
279-3513
279-3514
FAX: 275-3504

APR 25 2000

April 21, 2000

Hon. Frank O'Bannon
Governor of the State of Indiana
State House
Indianapolis, Indiana 46204

Mr. Glen Lawrence
Commissioner of the Dept. of Admn.
Room W479
402 West Washington
Indianapolis, Indiana 46204

Dear Governor O'Bannon and Mr. Lawrence:

Enclosed is a copy of the "work in progress" and as you can see the Bill of Rights was a killer to try to fit in but, it will be accomplished. I will soon pick up the blueprints and I will forward a set on you the two of you. With security and all I wanted you to have some advance notice that I will mail you something in a tube and it will have my address label on it, either my law office of state representative.

The size is basically the same as before but a little larger to allow for the Bill of Rights. I will keep you posted of developments as they take place. Look for the blueprint copy soon.

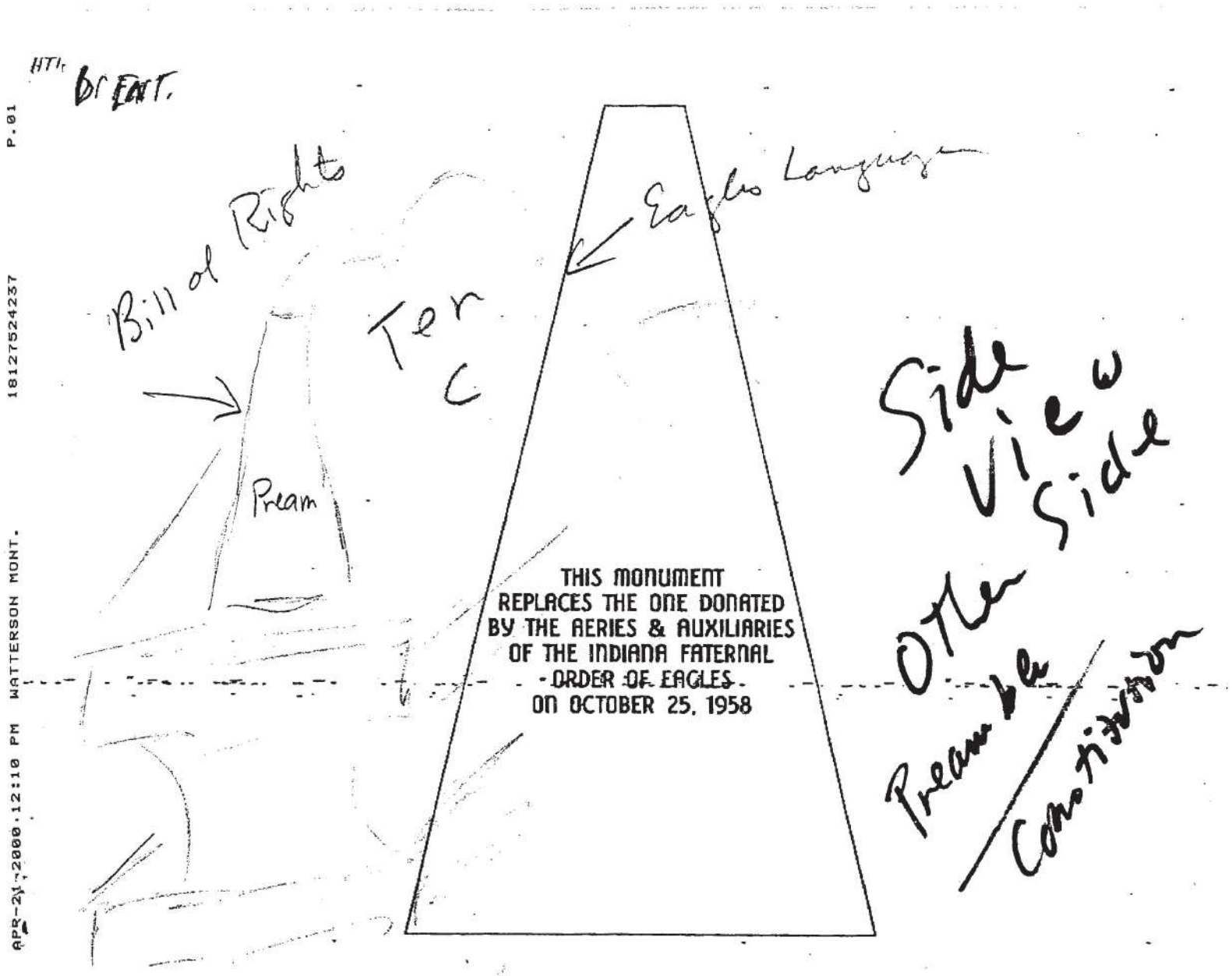
Thanking you for your attention to this matter, I am,

Sincerely,

Brent Steele



APR-21-2000 12:10 PM WATTERSON MONT. 18127524237 P.01



APR-21-2000 11:23 AM WATTERSON MONT. 18127524237 P.05

FRANK This SIZED OUT OK -

TEN COMMANDMENTS

I. THOU SHALT HAVE NO OTHER GODS BEFORE ME

II. THY SHALT NOT MAKE UNTO THEE ANY GRAVEN IMAGE

III. THOU SHALT NOT TAKE THE NAME OF THE LORD THY GOD IN VAIN

IV. REMEMBER THE SABBATH DAY TO KEEP IT HOLY

V. HONOR THY FATHER AND THY MOTHER THAT THY DAYS MAY BE LONG UPON THE LAND WHICH THE LORD THY GOD GIVETH THEE

VI. THOU SHALT NOT KILL

VII. THOU SHALT NOT COMMIT ADULTERY

VIII. THOU SHALT NOT STEAL

IX. THOU SHALT NOT BEAR FALSE WITNESS AGAINST THY NEIGHBOR

X. THOU SHALT NOT COVET THY NEIGHBORS HOUSE OR WIFE OR ANYTHING THAT IS THY NEIGHBORS

This S

Thou

JAN - IV does need to be in it

Plus "This monument replaces the one donated by The Aeries Auxiliaries of The Indiana Fraternal Order of Eagles on October 25, 195

4/21/00 FAX TO JAN

812 752 4237

APR-21-2000 11:21 AM WATTERSON MONT. 18127524237 P.03

BILL OF RIGHTS

I.
CONGRESS SHALL MAKE NO LAW RESPECTING AN ESTABLISHMENT OF RELIGION, OR PROHIBITING THE FREE EXERCISE THEREOF; OR ABRIDGING THE FREEDOM OF SPEECH, OR OF PRESS; OR THE RIGHT OF THE PEOPLE PEACEABLY TO ASSEMBLE, AND TO PETITION THE GOVERNMENT FOR A REDRESS OF GRIEVANCES.

II.
A WELL REGULATED MILITIA, BEING NECESSARY TO THE SECURITY OF A FREE STATE, THE RIGHT OF THE PEOPLE TO KEEP AND BEAR ARMS, SHALL NOT BE INFRINGED.

III.
NO SOLDIER SHALL, IN TIME OF PEACE BE QUARTERED IN ANY HOUSE, WITHOUT THE CONSENT OF THE OWNER, NOR IN TIME OF WAR, BUT IN A MANNER TO BE PRESCRIBED BY LAW.

IV.
THE RIGHT OF THE PEOPLE TO BE SECURE IN THEIR PERSONS, HOUSES, PAPERS, AND EFFECTS, AGAINST UNREASONABLE SEARCHES AND SEIZURES, SHALL NOT BE VIOLATED, AND NO WARRANTS SHALL ISSUE, BUT UPON PROBABLE CAUSE.

V.
NO PERSON SHALL BE HELD TO ANSWER FOR A CAPITAL CRIME UNLESS INDICTED BY A GRAND JURY, EXCEPT IN TIME OF WAR; NOR SHALL ANY PERSON BE TWICE PUT IN JEOPARDY OF LIFE OR LIMB; NOR SHALL BE COMPELLED IN ANY CRIMINAL CASE TO BE WITNESS AGAINST HIMSELF, NOR BE DEPRIVED OF LIFE, LIBERTY, OR PROPERTY, WITHOUT DUE PROCESS OF LAW; NOR SHALL PRIVATE PROPERTY BE TAKEN FOR PUBLIC USE, WITHOUT JUST COMPENSATION.

VI.
IN ALL CRIMINAL PROSECUTIONS, THE ACCUSED SHALL ENJOY THE RIGHT TO A SPEEDY AND PUBLIC TRIAL, BY AN IMPARTIAL JURY OF THE STATE AND DISTRICT WHEREIN THE CRIME SHALL HAVE BEEN COMMITTED, WHICH DISTRICT SHALL HAVE BEEN PREVIOUSLY ASCERTAINED BY LAW, AND TO BE INFORMED OF THE NATURE AND CAUSE OF THE ACCUSATION; TO BE CONFRONTED WITH THE WITNESSES AGAINST HIM; TO HAVE COMPULSORY PROCESS FOR OBTAINING WITNESSES IN HIS FAVOR, AND TO HAVE THE ASSISTANCE OF COUNSEL FOR HIS DEFENSE.

VII.
IN SUITS AT COMMON LAW, WHERE THE VALUE IN CONTROVERSY SHALL EXCEED TWENTY DOLLARS, THE RIGHT OF TRIAL BY JURY SHALL BE PRESERVED, AND NO FACT TRIED BY A JURY, SHALL BE OTHERWISE REEXAMINED IN ANY COURT OF THE UNITED STATES, THAN ACCORDING TO THE RULES OF THE COMMON LAW.

VIII.
EXCESSIVE BAIL SHALL NOT BE REQUIRED, NOR EXCESSIVE FINES IMPOSED, NOR CRUEL AND UNUSUAL PUNISHMENTS INFLICTED.

IX.
THE ENUMERATION IN THE CONSTITUTION, OF CERTAIN RIGHTS, SHALL NOT BE CONSTRUED TO DENY OR DISPARAGE OTHERS RETAINED BY THE PEOPLE.

X.
THE POWERS NOT DELEGATED TO THE UNITED STATES BY THE CONSTITUTION, NOR PROHIBITED BY IT TO THE STATES, ARE RESERVED TO THE STATES RESPECTIVELY, OR TO THE PEOPLE.

← too close?

It's a 5/8" letter

FRANK

FAX 812-275-2408

OO FRANK

Here's what it will look like — JAN worries it's a bit crowded — what do you think?

This is .65 or 5/8" letter

be subject to the same