

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

DR. JAMES DOBSON FAMILY
INSTITUTE and USATRANSFORM dba
UNITED IN PURPOSE

Plaintiffs,

v.

CHARLOTTE BURROWS, Chair of the
United States Equal Employment Opportunity
Commission; and UNITED STATES EQUAL
EMPLOYMENT OPPORTUNITY
COMMISSION, XAVIER BECERRA,
Secretary of the United States Department of
Health and Human Services; UNITED
STATES DEPARTMENT OF HEALTH
AND HUMAN SERVICES

Defendants.

No. _____

DECLARATION OF MICHAEL SEIFERT

I, Michael Seifert, declare under penalty of perjury as follows

1. The following statements are based on my personal knowledge, and if called to testify, I could swear thereto.

2. I am over 18 years of age and of sound mind.

3. I am a citizen of the United States.

4. I am the founder, Chairman, and Chief Executive Officer of PSQ Holdings, Inc., a for-profit corporation, that does business as PublicSquare.

5. PublicSquare is a commerce and payments ecosystem. It serves consumers and businesses that value life, family, and freedom. PublicSquare operates in three segments of the economy: (a)

a digital marketplace with over two million registered consumers and over 80,000 accredited vendors, (b) a brands division that includes a wholly-owned subsidiary called EveryLife that sells premium diapers and other baby products, and (c) a financial technology segment that includes consumer finance, cancel-proof payments processing, and a digital marketing tool for small businesses.

6. PublicSquare is controlled, directed, and led by Christians. Christians own over 65% of the voting rights for Public Square stockholders. I myself permanently own 51% of the voting rights for PublicSquare stockholders.

7. PublicSquare's board of directors consists of eight directors. Seven are Christian. One is Muslim. All of our board meetings begin with prayer.

8. Every PublicSquare board committee chairperson is a Christian.

9. PublicSquare's Chief Executive Officer, Chief Operating Officer, Chief Legal Officer, Chief Financial Officer, Chief Strategy Officer, Secretary, and Treasurer are Christian.

10. PublicSquare has approximately 120 employees. A substantial majority of them are Christian.

11. Our Christian values affect almost everything we do at PublicSquare. Our Christian ethics inform our business ethics, including how we source merchants and how we utilize Christian influencers and podcasters to communicate with Christian audiences regarding PublicSquare's services.

12. An important Biblical text informing our mission is from Proverbs 3:9 where "we are asked to honor the Lord with the fruits our labor." This means that we should give, spend, and invest "our money in a way that honors God." See <https://www.publicsquare.com/why/faith>.

13. The consumers shopping on PublicSquare's marketplace are able to "[p]ut purpose behind [their] purchase" because PublicSquare is a "marketplace for businesses that respect faith, family, and freedom." See <https://www.publicsquare.com/why/faith>.

14. While all of our employees are not Christian, we seek to hire individuals who align with our values.

15. When disputes arise within PublicSquare, we encourage employees to resolve them in the manner Jesus commended in Mt. 18:15-17.

16. Instead of observing Pride Month, PublicSquare donated 10% of its sales in June 2024 to the National Fatherhood initiative. See PublicSquare, *National Fatherhood Initiative: PublicSquare to donate 10% of June sales* (available at <https://www.publicsquare.com/blog/psq-updates/national-fathers-day-initiative>). We also celebrated fatherhood on Father Day with a reflection posted on our website on the importance of fatherhood and the role of fathers within divine plan for families:

God's Design for Fathers

From the very beginning, God established the family as the fundamental unit of society. In His wisdom, He ordained fathers to be the leaders, protectors, and providers of their households. Ephesians 6:4 reminds us, "Fathers, do not provoke your children to anger, but bring them up in the discipline and instruction of the Lord." This scripture highlights the dual role of fathers: to nurture their children with love and to guide them with Godly wisdom.

Fathers are called to be a reflection of our Heavenly Father's love. Just as God provides for His children, so too are fathers called to provide for their families. Just as God leads us with patience and kindness, fathers are to lead their families with grace and understanding. This divine blueprint for fatherhood is a testament to the importance of fathers in God's plan.

The Pro-Family Commitment of PublicSquare

At PublicSquare, we are proud to be a pro-family organization that honors the role of fathers. We are committed to supporting fathers in their God-given roles, recognizing that their strength and leadership are vital to the health and well-being of families and communities. We believe that strong families are the bedrock of a thriving society, and fathers play a critical role in this foundation. Our

commitment to family values is unwavering, and we strive to create an environment where fathers are celebrated and supported.

See <https://www.publicsquare.com/blog/culture/fathers-day-2024>.

17. The merchants participating in the PublicSquare Marketplace must affirm that they “respect traditional American values” related to life, family, and freedom. We know that the Author of these values is Jesus Christ.

18. Many of our merchants are Christian-owned businesses. For example, one of our merchants is called “Seven Weeks Coffee.” It is called “Seven Weeks” because a child in utero is, at seven weeks gestation, about the size of a coffee bean. Seven Weeks Coffee, featuring its Life Blend, its Hope Blend, and its Faith Blend, supports over 900 pro-life organizations. Another example of one of our merchants, is Prayer Bowl, a company that sells pottery that holds prayer intention cards.

19. When marijuana companies and pornography companies have sought to become PublicSquare merchants, we have rejected their applications because of PublicSquare’s Christian values.

20. When we realized that all major diaper companies support pro-abortion movements, we started PublicSquare’s wholly-owned subsidiary, EveryLife. EveryLife is unabashedly pro-life. Its published values are:

Celebrate Life

Every baby is a miracle and a gift from above. We cherish it, celebrate it, and seek to protect it, always.

Stand with Integrity

We are here because our values, vision, and mission are deeply held convictions that drive us to build a different kind of company. We will never sacrifice our beliefs or the integrity of our products for the sake of popularity, gain or grift nor will we support anything that goes against our mission to protect life.

Champion Parenthood

Being a parent is the greatest job we'll ever have and celebrating the blessing of parenthood is at the heart of what we do. And when we champion parenthood and the innocence of new life — we build a healthier, happier future for our Nation.

Rooted in Faith

Everything we do at EveryLife is grounded in our faith in Christ and the truth of the Gospel.

See <https://everylife.com/pages/our-mission>.

21. On our Every Life website, we promise moms:

Mom, God has created you to sustain life. You make the hard decisions to protect your little ones every single day and do it with strength and grace. We are here by your side delivering excellent products you can trust, unrivaled customer service, and a community of like-minded parents you can turn to. Women become moms under a variety of circumstances, and we are here to support all of you.

Id.

22. Because Every Life sees “every baby [as] a miracle from God,” it has already donated over 1.5 million diapers to pregnancy resource centers around the country. See <https://everylife.com/pages/join-changing-lives-club>.

23. PublicSquare’s Christian values not only inform things that the company ought not do, but those that it should do. This is why PublicSquare provides a fully funded health plan for its full-time employees. It is why PublicSquare provides a \$5,000 after tax “baby bonus” to help support every employee family that has a baby or adopts a child with no limit on the number of baby bonuses per family. See Francesca Pollio Fenton, *Company announces ‘baby bonus’ for employees expecting or adopting a child*, Catholic News Agency (June 19, 2023) (available at: <https://www.catholicnewsagency.com/news/254604/company-announces-baby-bonus-for-employees-expecting-or-adopting-a-child>). It is also why PublicSquare is working diligently to

exclude abortion, “gender-affirming care,” and immoral infertility treatments from that plan. This is one of the reasons why PublicSquare became an employer member of United in Purpose.

24. I have reviewed Dr. Owen Strachan’s summary of Biblical Christian beliefs related to abortion, “gender-affirming care,” the use of false pronouns to affirm those considering gender transition, the withholding of statements supporting Christian teaching about human sexuality or criticizing gender ideology, and the preservation of single-bathrooms and other sex-segregated spaces. Dr. Strachan’s summary aptly states PublicSquare’s values regarding the subjects he addresses. PublicSquare seeks to align its employment practices, benefits, and health plans with those values.

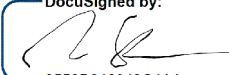
25. PublicSquare’s employee health plan is a self-funded plan. While we are presently in the process of adopting a new plan, both our present health plan and our new plan have or will have third-party administrators that participate on federal exchanges and, thus, receives funding from the U.S. Department of Health and Human Services.

26. PublicSquare does not make accommodation for employees to seek or acquire abortion, immoral fertility statements, or gender transition drugs or services.

27. PublicSquare will take appropriate adverse employment action against any applicant or employee whose speech, advocacy, or conduct undermines PublicSquare’s values with regard to life, family, freedom, abortion, immoral infertility treatments, or gender transition.

28. I declare under penalty of perjury that the statements herein are true and correct to the best of my knowledge.

Executed on the fifteenth day of October 2024.

DocuSigned by:

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Michael Seifert