

**APPENDIX B**

**1994 SURVEY ON AMERICAN VIEWS OF THE MOTTO**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 94-S-1345

ANNE N. GAYLOR; ANNIE LAURIE GAYLOR; DANIEL E. BARKER; GLENN V. SMITH; JEFF BAYSINGER; LORA ATTWOOD; THE FREEDOM FROM RELIGION FOUNDATION, INC.; and THE COLORADO CHAPTER OF THE FREEDOM FROM RELIGION FOUNDATION, INC.,

Plaintiffs,

v.

THE UNITED STATES OF AMERICA; THE DEPARTMENT OF THE TREASURY; LLOYD W. BENTSEN, SECRETARY OF THE TREASURY; and MARY ELLEN WINTHROW, TREASURER OF THE UNITED STATES;

Defendants.

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AFFIDAVIT OF SHARON R. CHAMBERLAIN

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I, Sharon R. Chamberlain, being duly sworn, do hereby make the following affidavit:

1. I am the President and sole owner of Chamberlain Research Consultants. I have been in the polling business since 1988.

2. Chamberlain Research Consultants (CRC) is an independent, full-service market research firm. We are located at 4801 Forest Run Road in Madison, Wisconsin and have been in

business since 1988. The firm has been solely owned by me since June of 1990; prior to that, it was a branch of Matousek and Associates, where I was a partner.

3. Wisconsin Interviewing Services (WIS) is the field service owned by CRC. The field service includes a phone bank and focus group facility. WIS is responsible for the actual collection of data. CRC is responsible for research design and analysis. CRC/WIS employs approximately six full-time and 25 to 50 part-time people at any given time.

4. CRC/WIS clients include: school districts, utility companies, political candidates, lobbyists, restaurants and food manufacturers, trade associations, ad agencies and design firms, marketing firms, insurance companies, government agencies, law firms, new product developers, newspapers, and radio stations.

5. CRC was contracted by the Freedom From Religion Foundation, Inc. to conduct a poll on the use of the phrase "In God We Trust" as seen on U.S. currency. The poll was conducted with 900 adults across the nation. The number of surveys was chosen to provide a sufficient margin of error, in other words, approximately  $\pm 3\%$ .

6. CRC purchased a random sample telephone list from Scientific Telephone Samples (STS) in California for use in this study. STS was instructed by CRC to draw the numbers proportionately to population across all 50 states. The sample was generated so that unlisted phone numbers were not excluded from the sample.

7. Quotas were set for gender based on the most recent U.S. Census data available (1990: 52% female, 48% male). The gender constraints were placed on the sample because past experience has shown us that the proportion of women who answer

the telephone is higher than the actual proportion of women in the population.

8. The poll was in the field May 18-23, 1994. All surveys were conducted from a supervised phone bank. Over 10% of the interviews were monitored by a supervisor through our special phone system, and/or called back for transcription verification. Over 10% of the keying-in data entry was also verified.

9. Among the employees of CRC and WIS who assisted with this survey, in addition to me, were: Janeen Potts, Interim Field Service Director; Rob Padley, Supervisor; Ryan Randall, Supervisor; and Nicole Wyrembeck, Senior Analyst.

10. Attached as Exhibit A is the survey form with raw data, exact questions and their responses.

11. This poll establishes that the majority of those surveyed believe that the phrase "In God We Trust" is religious, as opposed to non-religious, and endorses a belief in God. As for endorsing religion over atheism, almost 11% of the respondents did not choose yes or no. Of those who did give an opinion, the majority agreed that the phrase does endorse religion over atheism.

12. The margin of error for this poll was  $\pm 3.22\%$  at the 95% confidence level.

13. This poll was conducted in accordance with generally accepted standards in the industry.

Further, the affiant sayeth not.

Sharon R. Chamberlain

STATE OF WISCONSIN     )  
                                      ) ss.  
COUNTY OF DANE         )

Subscribed and sworn to before me this 14th day of September,  
1994.

Jacklyn M. Sande  
Notary Public

My commission expires: 2-19-97

MOTTO TEST: Raw Data

Job # 132  
May 18-23, 1994  
Sample Size = 900  
Margin of Error =  $\pm 3.22\%$

Sex: Male    Female  
48%    52%

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Hello, this is \_\_\_\_\_ from Chamberlain Research. Tonight we're doing a one minute survey with people across the nation. Am I speaking with someone who is over the age of 18? (If not, ask to speak with someone who is, terminate if none)

The United States is currently working on redesigning US currency. The topic of my three questions is the motto "In God We Trust," as seen on US currency.

1. Is "In God We Trust" religious or non-religious?

Religious.....550  
61.1%

Non-religious.....271  
30.1%

DK.....79  
8.8%

2. Does "In God We Trust" endorse a belief in God?

Yes.....641  
71.2%

EXHIBIT A

No.....217  
24.1%

DK.....42  
4.7%

3. Does “In God We Trust” endorse religion over atheism?

Yes.....480  
53.3%

No.....322  
35.8%

DK.....98  
10.9%