

AFFIDAVIT OF CYNTHIA KISSER

I, CYNTHIA KISSER, state as follows:

1. I am the plaintiff in *Kisser v. The Coalition for Religious Freedom*, Case No. 92C4508.
2. Between June, 1992 and December, 1995 I paid \$62,500 in attorneys fees.

I paid \$2,500 of this to Peter Georgiades of Wile, Georgiades, Homyak & Norkus for taking the depositions out of the state of Illinois of employees of a defendant in the *Kisser v. Coalition* case. An additional \$1,567.50 is still owed to Mr. Georgiades for this work.

I paid attorneys Edna Selan Epstein, John M. Beal and John P. DeRose each \$20,000 as part of contingency fee agreements I contracted with each of these attorneys. Each placed the \$20,000 I paid them into retainer accounts which was applied for hours billed me for work done either for the *Kisser v. Coalition* case or the companion state case, *Kisser v. Crusader*. None of this money was applied to costs as all costs, including the costs of deposition transcripts, travel, filing fees and copying were fully paid by me for both cases.

3. Between July 19, 1996 and June 15, 1997 I applied for 18 jobs, none of which resulted in employment. These included a position as Director of Public Relations for a college, Associate Vice President for Communications for a college, Executive Director for three separate non-profit organizations, Director for a non-profit organization, office manager of a non-profit organization, Public Affairs Associate for a non-profit organization, a management position for a government agency, editorial work for two separate publishing companies, editorial work for a trade association, management positions for a non-profit and a veterinary firm, a staff position at a health care facility, administrative assistant to a State's Attorney, management with a retail business and legal secretary for a law firm.

I made inquiries to 18 other organizations in response to advertisements placed by those agencies, or because I believed they might offer employment opportunities to me, but did not fill out an application or send a resume because the job did not pay a sufficient amount to justify relocation to another state, because I was over-qualified for the position, or because no work was available at the time. These organizations included two universities, a law enforcement agency, four manufacturing companies, a retail business, a school district, a legal firm, a financial organization, an insurance company, a research institute, three non-profit organizations, a retirement center, and a corporation offering fitness training. Further, I contacted three professional associations for non-profit executives to secure job leads, contacted an employment service, a career development center, communicated with several professional contacts for job leads, and spent dozens of hours searching computerized databases.

4. Since the filing of my affidavit of August 23, 1997 with this court, I have become personally liable for another loan in the amount of \$10,000, \$892.50 of that amount for tuition expenses and the remainder for living expenses because I am supported solely by my husband and his net income cannot pay expenses beyond our basic living expenses, such as taxes, auto repairs, or maintenance to the house.

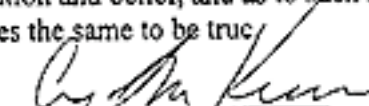
Because of the amount of personal debt which I owe and the fact that I own no individual assets of value to serve as collateral, I do not believe I qualify for any additional private loan.

FURTHER AFFIANT SAYETH NAUGHT.


Cynthia Kissner

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.


Cynthia Kissner

Dated October 4, 1997