

EXHIBIT J

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DWELLING PLACE NETWORK, a New Jersey not-for-profit corporation; HOUSE OF PRAISE CHURCH, a New Jersey not-for-profit corporation; CORNERSTONE COMMUNITY CHURCH, a New Jersey not-for-profit corporation; NEW LIFE CHURCH, a New Jersey not-for-profit corporation; BOBBY BLEDSOE; STEVE BURTON; RALPH GRAVES; and RICHARD MYERS,

Plaintiffs,

v.

PHILIP D. MURPHY, in his official capacity as Governor of the State of New Jersey; GURBIR S. GREWAL, in his official capacity as Attorney General of the State of New Jersey; and PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey Division of State Police

CIVIL ACTION NO.:
1:20-CV-6281-RBK-AMD

DECLARATION OF COUNSEL

and as State Director of Emergency Management, Defendants.	
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DANIEL M. VANNELLA, of full age, hereby declares as follows:

1. I am employed as an Assistant Attorney General by the State of New Jersey, Department of Law and Public Safety, Division of Law. I provide this Declaration in support of Defendants’ Opposition to Plaintiffs’ Motion for a Preliminary Injunction.

2. Attached to this Declaration are true and accurate copies of the following Exhibits:

- A. Michelle L. Holshue, et al., “First Case of 2019 Novel Coronavirus in the United States,” *N. Engl. J. Med.* 382:929–36 (Mar. 5, 2020).
- B. Natasha Khan, “New Virus Discovered by Chinese Scientists Investigating Pneumonia Outbreak,” *Wall Street Journal* (Jan. 8, 2020).
- C. Berkeley Lovelace, Jr. & William Feuer, “CDC Confirms First Human-to-human Transmission of Coronavirus in US,” *CNBC* (Jan. 30, 2020).
- D. Centers for Disease Control and Prevention (“CDC”), *Coronavirus Disease 2019 – Frequently Asked Questions*, available at <https://www.cdc.gov/coronavirus/2019-ncov/faq.html> (last visited May 26, 2020).
- E. March 13, 2020 Proclamation of National Emergency.
- F. Executive Order on Prioritizing and Allocating Health and Medical Resources to Respond to the Spread of Covid-19.

- G. CDC, *Coronavirus Disease 2019 (COVID-19) - Protect Yourself*,” available at https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fprepare%2Fprevention.html (last visited May 26, 2020).
- H. Camilla Rothe, et al., “Transmission of 2019-nCoV Infection from an Asymptomatic Contact in Germany,” *N. Engl. J. Med.* 382:970–71 (Mar. 5, 2020).
- I. Lea Hamner, MPH, et al., CDC, “High SARS-CoV-2 Attack Rate Following Exposure at a Choir Practice—Skagit County, Washington, March 2020,” *Morbidity and Mortality Weekly Report (MMWR)*, available at <https://www.cdc.gov/mmwr/volumes/69/wr/pdfs/mm6919e6-H.pdf> (last visited May 26, 2020).
- J. Allison James, DVM, PhD, et al, CDC, “High COVID-19 Attack Rate Among Attendees at Events at a Church, Arkansas, March 2020,” *MMWR*, available at <https://www.cdc.gov/mmwr/volumes/69/wr/pdfs/mm6920e2-H.pdf> (last visited May 26, 2020).
- K. Isaac Ghinai, MBBS, et al., CDC, “Community Transmission of SARS-CoV-2 at Two Family Gatherings, Chicago, Illinois, February-March 2020,” *MMWR*, available at <https://www.cdc.gov/mmwr/volumes/69/wr/pdfs/mm6915e1-H.pdf> (last visited May 26, 2020).
- L. Youjin Shin, Bonnie Berkowitz & Min Joo Kim, “How a South Korean Church Helped Fuel the Spread of Coronavirus,” *Washington Post* (Mar. 25, 2020).
- M. Anna Kim, “Glenview Church Hit by COVID-19 Is Now Streaming Service Online, as Pastor Remembers Usher Who Died of Disease,” *Chicago Tribune* (Mar. 31, 2020).
- N. Chris Epp, “‘I Would Do Anything for a Do-Over’: Calgary Church Hopes Others Learn from Their Tragic COVID-19 Experience,” *CTV News* (May 10, 2020).

- O. Richard Read, “A Choir Decided to Go Ahead with Rehearsal; Now Dozens of Members Have COVID-19 and Two Are Dead,” *Los Angeles Times* (Mar. 29, 2020).
- P. Maggie Holmes, “Two People Die of COVID-19 as a Result of Church Gatherings in KCK,” *KCTV News5* (Apr. 8, 2020).
- Q. Bailey Loosmore & Mandy McLaren, “Kentucky County ‘Hit Really, Really Hard’ by Church Revival that Spread Deadly COVID-19,” *Louisville Courier Journal* (Apr. 2, 2020).
- R. Mario Koran, “California Megachurch Linked to Spread of More than 70 Coronavirus Cases,” *Guardian* (Apr. 3, 2020).
- S. Akin Andone & Artemis Moshtaghian, “A Person Who Was Covid-19 Positive Attended a Church Service and Exposed 180 People, Officials Say,” *CNN* (May 17, 2020).
- T. Johns Hopkins Univ., COVID-19 Dashboard, available at <https://coronavirus.jhu.edu/map.html> (last visited June 11, 2020).
- U. CDC, *Coronavirus Disease – Cases in the US*, available at <https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html> (last visited June 11, 2020).
- V. N.J. Dep’t of Health, *New Jersey COVID-19 Dashboard*, available at https://www.nj.gov/health/cd/topics/covid2019_dashboard.shtml (last visited June 11, 2020).
- W. Sheri Fink, “Worst-Case Estimates for U.S. Coronavirus Deaths,” *New York Times* (Mar. 13, 2020).
- X. Ashley Balcerzak, “Nearly All Businesses in NJ Are Closed Why Are Liquor Stores Open,” *MSN.com* (Mar. 29, 2020).
- Y. New Jersey Attorney General Press Releases regarding enforcement of COVID-19 restrictions on March 27, 2020; April 1, 2020; April 3, 2020; April 5-9, 2020; April 11, 2020; April 13, 2020; April 15-16, 2020; April 19, 2020; April 24, 2020; May 8, 2020; May 22, 2020; May 29, 2020; and June 5, 2020.

Z. Carlie Porterfield, “Church-Related Coronavirus Outbreaks Reported as Trump Pushes for Reopening,” *Forbes.com* (May 23, 2020).

AA. Zeeshan Aleem, “One German Church Service Resulted in More Than 100 Coronavirus Infections,” *Vox.com* (May 24, 2020).

BB. CDC, *Get Your Mass Gatherings or Large Community Events Ready—Interim Guidance for Coronavirus Disease 2019 (COVID-19)*, available at <https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/mass-gatherings-ready-for-covid-19.html> (last visited June 10, 2020).

I declare that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Daniel M. Vannella

Daniel M. Vannella
Assistant Attorney General

Date: June 11, 2020