EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THE NATIONAL SPIRITUAL ASSEMBLY OF THE BAHA'IS OF THE UNITED STATES OF AMERICA UNDER THE HEREDITARY GUARDIANSHIP, INC.,	)	
Counter-Defendant,	)	**Civil Action No. 64 C 1878**
v.	)	**The Honorable J. Austin**
NATIONAL SPIRITUAL ASSEMBLY OF THE BAHA'IS OF THE UNITED STATES,	)	
Counterclaimant.	)	

DECLARATION OF GEOFFREY N. WILSON IN SUPPORT OF THE NSA'S MOTION FOR RULE TO SHOW CAUSE WHY THE REMEYITES SHOULD NOT BE HELD IN CONTEMPT

I, Geoffrey N. Wilson, hereby declare as follows:

1. Except as otherwise noted herein, I have personal knowledge of all facts set forth in this declaration.

2. I am General Counsel for the National Spiritual Assembly of the Baha'is of the United States ("NSA") and I am in charge of its Office of Legal Affairs. I have served in this capacity for approximately eighteen years.

3. The Office of Legal Affairs is responsible for all of the NSA's and its affiliates' legal matters, including, but not limited to intellectual property issues.

4. I am a Baha'i in good standing as evidenced in part by my identification card a copy of which is attached hereto as Wilson Exhibit 1.

The Baha'i Faith

5. Founded in Iran in 1844, the Baha'i Faith now has more than 5 million adherents in 236 countries and territories. The central theme of the Baha'i Faith is unity. Among other things, Baha'is believe in the unity of all humankind and that the day has come for all humanity to abolish prejudice of every kind and recognize this unity in diversity.

6. Baha'is believe that the distinctive unity of the Baha'i Faith stems from a promise from God to humanity that assures His continuing guidance after the passing of Baha'u'llah, the founder of the Baha'i Faith. This promise is referred to as the Covenant. The Covenant is understood to be synonymous with the line of succession to authority after Baha'u'llah, as set down in the written scriptures of the Faith. On the basis of specific documents that form part of the Baha'i scriptures, Baha'is believe that this line goes from Baha'u'llah to his son, 'Abdu'l-Baha, then from 'Abdu'l-Baha to his grandson, Shoghi Effendi, then to the Universal House of Justice and is intended to provide for the unity and protection of the Baha'i Faith.

7. According to the Baha'i Faith, to be faithful to the Covenant is to accept the authority of Baha'u'llah's appointed successors and to adhere to the arrangements he made for the advancement of the Baha'i Faith. To break the Covenant is to reject or deliberately attempt to usurp or undermine the authority Baha'u'llah established, while still claiming to be a Baha'i. Baha'is understand such an action to be an attack on the Faith's unity which is essential to its message of peace and reconciliation.

8. The Baha'i Faith accepts and reaffirms all the world's major religions as parts of a single, progressive process culminating for this day in the new laws and teachings of the Baha'i Faith. The Baha'i Faith has no denominations and no clergy.

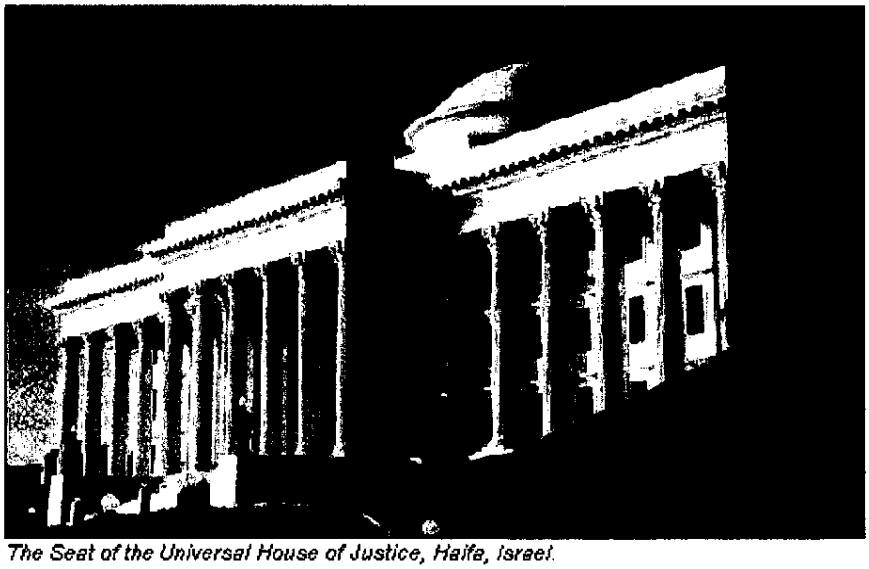
Administration of the Baha'i Faith

9. The spiritual and administrative institutions of the Baha'i Faith are unique. The administrative system of the Baha'i Faith is formal and very structured. The apex of the Baha'i Faith's spiritual and administrative order is the Universal House of Justice an institution that, Baha'is understand, is unerringly guided by God in its decision-making. The Baha'i Faith is administered through a network of elected institutions. It consists of councils operating at global, national and local levels formed by free elections

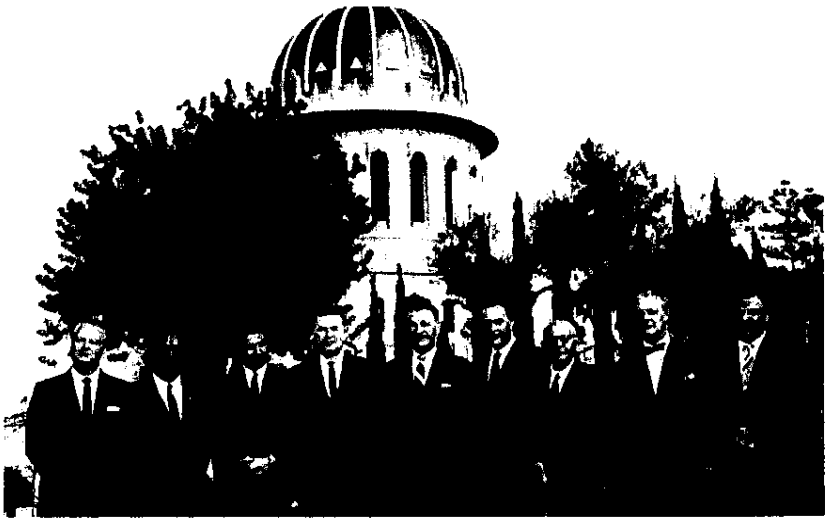
characterized by the absence of nominations and campaigning. Each local community is cared for by a Local Spiritual Assembly elected annually by the Baha'is in their localities. Regional Baha'i Councils serve in designated regions to assist and strengthen the Local Spiritual Assemblies and are annually elected by the combined membership of the Local Spiritual Assemblies in their regions. Countries are unified under National Spiritual Assemblies elected annually on a representative basis. All the Baha'is are connected through, and follow, the guidance of the Universal House of Justice, elected every five years by the combined membership of the National Spiritual Assemblies.

The Universal House of Justice

10. The Universal House of Justice is the exclusive supreme authority of the Baha'i Faith's spiritual and administrative order. It is composed of nine members and elections to its number have been held every five years since its formation in 1963. The Seat of the Universal House of Justice is on Mount Carmel in Haifa, Israel near the Baha'i Faith's holiest shrines and in the administrative and spiritual center of the Baha'i Faith, known as the Baha'i World Centre. The Seat of the Universal House of Justice and members of the first Universal House of Justice are pictured below.



The Seat of the Universal House of Justice, Haifa, Israel.



11. From the Baha'i World Centre in Israel, The Universal House of Justice directs the growth and development of the Baha'i community worldwide, maintains and elucidates the Baha'i sacred texts, resolves matters that cause differences between Baha'is, communicates with NSAs around the world, develops and disseminates international goals and plans, creates and monitors social and economic development projects, keeps and collects statistics, manages funds and clarifies Baha'i laws. The Universal House of Justice is charged with exerting a positive influence on the general welfare of humankind. The Universal House of Justice also devotes significant resources to the safe-guarding of Baha'is living in predominantly Muslim countries.

12. In 1963, the year that the Universal House of Justice was first elected, worldwide Baha'i membership had reached 400,000 in 11,000 localities and organized into 56 national and regional communities. By 2004, there were more than five million Baha'is in more than 100,000 localities and 183 National Spiritual Assemblies.

13. The Universal House of Justice vests each National Spiritual Assembly with exclusive jurisdiction and authority over the Baha'i Faith within the country in which the National Spiritual Assembly is situated. The National Spiritual Assemblies owe their undivided allegiance and obedience to the Universal House of Justice and are charged with guiding and coordinating Baha'i activities and protecting the Baha'i Faith within their country.

National Spiritual Assembly of the Baha'is of the United States

14. The National Spiritual Assembly of the Baha'is of the United States ("NSA"), headquartered in the vicinity of the Baha'i House of Worship in Wilmette, Illinois, is authorized by the Universal House of Justice as the sole authority of the Baha'i Faith in the United States. The NSA owns and is entitled to the exclusive use of the trademarks and service marks of the Baha'i Faith in the United States.

15. The NSA is charged with the sole and exclusive authority and responsibility for supervising, stimulating and unifying the activities of all members of the Baha'i Faith in the U.S., including over 1,100 Local Spiritual Assemblies, and for increasing the Baha'i Faith's numbers and esteem in the U.S. The NSA operates many offices and agencies across the nation, several Baha'i retreat and conference centers and an educationally licensed 50,000 watt Baha'i radio station. The NSA owns and operates the Baha'i House of Worship in Wilmette, Illinois, one of the most well-known and outstanding architectural and religious edifices in the world.

16. The NSA, for many decades, has disseminated throughout the U.S. information concerning the Baha'i Faith and the many activities of the NSA and its numerous LSA's and affiliates. Said information has been communicated through a wide variety of means, including books, pamphlets, circulars, newsletters, motion pictures, radio, satellite radio, presentations, radio, television, the World Wide Web and podcasts.

17. The NSA has sold or distributed millions of publications concerning the Baha'i Faith and bearing the NSA's marks, including nearly 1.5 million copies of various publications from 1999 to October 2006 alone, through its distribution facilities throughout the U.S., including its affiliate the Baha'i Publishing Trust and numerous LSAs, groups and individuals affiliated with the NSA.

18. The NSA is represented at the United Nations by the Baha'i International Community, which represents and manages the worldwide Baha'i community's relations with the world. With offices at the United Nations in New York and Geneva, Switzerland and representations to United Nations regional commissions in several countries, the Baha'i International Community has enjoyed recognition as an international non-governmental organization at the United Nations since 1948 and was granted consultative status with the United Nations Economic and Social Council in

1970. It also holds consultative status with the United Nations Children's Fund (UNICEF) and the United Nations Development Fund for Women (UNIFEM) and has working relations and association with several other UN programs, such as the World Health Organization, the UN Environment Program, the Office of the High Commission for Human Rights, and the UN Development Program. The Baha'i International Community's relationship with the UN is vital to the NSA's and the Baha'i Faith's message of worldwide unity and equality as well as to the protection of its members in areas where they are persecuted.

19. The NSA is similarly well-known to the federal government of the United States through the NSA's Office of External Affairs in Washington, D.C. One of the Office of External Affairs' primary endeavors is to seek assistance from the United States regarding the persecution of Baha'is in Iran. The U.S. Congress has passed eight resolutions over the years regarding this problem. The U.S. government's attention to the concerns of the Baha'i Faith is largely a result of the NSA's efforts and the esteem in which the Baha'i Faith is held by the U.S. Congress, the State Department, the White House and prominent non-governmental organizations in Washington. Exemplary communications to the NSA on these topics from prominent public figures, such as former United States Presidents Lyndon B. Johnson and Ronald Reagan are attached as Wilson Exhibit 2.

20. In addition, on June 26, 1994, Illinois governor Jim Edgar issued a proclamation to the Baha'is of the United States on the anniversary of the establishment of the Baha'i Faith in North America, recognizing the Baha'i House of Worship in Wilmette, Illinois and the Baha'i National Center in Evanston, Illinois as the center of the Baha'i Faith in the United States. *See* Wilson Exhibit 2.

21. The NSA (and the Baha'i Faith) is nonpartisan and nonpolitical. Its programs are supported exclusively by voluntary contributions from its followers. The Baha'i Faith's teachings stress the importance of obedience to civil government and laws. Baha'is may accept nonpartisan government posts or appointments but they do not engage in partisan political activity – including discussion of individual candidates or parties. The nonpartisan position of the NSA and the Baha'i Faith is adhered to strictly.

22. The NSA engages in collaborative projects with prominent interfaith religious groups, such as The Religion Communicators Council, Faith Communities Today, the Parliament of the World's Religions, the North American Interfaith Network, the Tripartite Forum on International Cooperation for Peace and the Committee of Religious Nongovernmental Organizations. Interfaith cooperation is important to the NSA and in keeping with the Baha'i Faith's acceptance of all the world's major religions as a part of a single, progressive process and its desire to build and foster friendship with people of all faiths.

The Local Spiritual Assemblies

23. The Local Spiritual Assembly ("LSA") is the basic unit of the Baha'i administrative order. An LSA is elected annually by the adult Baha'i members of each locality in every municipality where nine or more adult Baha'is reside. A written report of the election, and its conformity to Baha'i standards for such elections, is submitted to the NSA for its approval. LSAs oversee the wide variety of activities that constitute the essence of Baha'i community life at the local levels, such as education, observance of holy days, devotional services, social events, marriages and funerals. The Baha'i administrative order is strictly hierarchical. NSAs are subject to the Universal House of Justice's decisions on all matters and each LSA is subject to the decisions of the NSA in the country in which the LSA is organized. The over 1,100 LSAs in the United States are responsible to the NSA and submit reports to the NSA regarding their activities.

Membership In The Baha'i Faith

24. The Baha'i Faith maintains a membership roll that lists members by name. To become a member of the Baha'i Faith in the United States, a person signs a declaration card and, subject to the approval of the NSA, is added to the membership roll maintained at the LSA and NSA offices. When one signs a declaration card the declarant acknowledges "that Baha'u'llah has established sacred principles, laws and institutions which [the declarant] must obey."

25. In many jurisdictions, including the United States, members of the Baha'i Faith are also issued identification cards. *See* Wilson Exhibit 1. These cards serve many functions, including as a means to verify ones membership in the U.S. Baha'i community

for purposes of voting in Baha'i elections, contributing to Baha'i funds and serving on Baha'i national, regional and local assemblies.

26. It is well-publicized that Baha'is in Iran are severely persecuted. Accordingly, Iranian Baha'is are offered asylum in the United States for religious purposes. The United States government and immigration authorities rely in part on the NSA's ability to verify the authenticity of membership in the Baha'i Faith for purposes of granting or denying asylum. Indeed, there have been cases of aliens seeking asylum status by falsely claiming membership in the Baha'i Faith, in order to avoid deportation. Because the NSA maintains membership records, it is able to quickly and accurately verify membership in the Baha'i Faith when questioned by the United States government.

27. The Baha'i Faith also has a procedure for removing persons from its membership. This procedure is of last resort when a person's actions are destructive of the Baha'i Faith and a threat to its unity. If a person in the U.S. is not on the NSA's membership rolls, then that person is not regarded as a member of the U.S. Baha'i community. If the person is also not listed on the membership rolls of any foreign NSA, and is not serving at the Baha'i World Centre in Haifa, Israel, then the person is not recognized as a Baha'i.

The NSA's Trademarks

28. The NSA has continued to use the marks that it owned at the time of the Court's injunction in Civil Action No. 64 C 1878 and has maintained the referenced federal registrations. Moreover, the NSA's federal registrations have become incontestable. A table setting out registration status is attached as Wilson Exhibit 3.

The Remeyites

29. The alleged contemnors named in the accompanying Memorandum In Support of NSA's Motion For A Rule To Show Cause are not recognized as members of the Baha'i Faith by the Universal House of Justice or the NSA, they have no affiliation with the NSA and they have no Baha'i Faith administrative or ecclesiastical authority whatsoever.

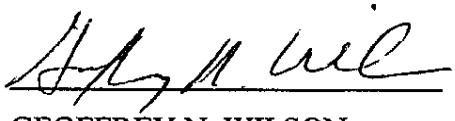
30. The NSA's reputation and credibility are central to the NSA's success and the success of the Baha'i Faith. The NSA has no control over the actions or doctrines of the alleged contemnors, which, if attributed to the NSA, will severely damage the NSA

and the Baha'i Faith in their endeavors and cause confusion regarding its aims and purposes. The alleged contemnors' publications as well as their venomous messages and doctrines regarding other faiths, governments and non-governmental organizations are causing irreparable harm to the NSA.

31. The alleged contemnors have the right to organize and worship according to their dictates, but they have no right to utilize names and marks that allow them to appropriate the good will earned by the NSA and to subject the general public to confusion, deception and mistake.

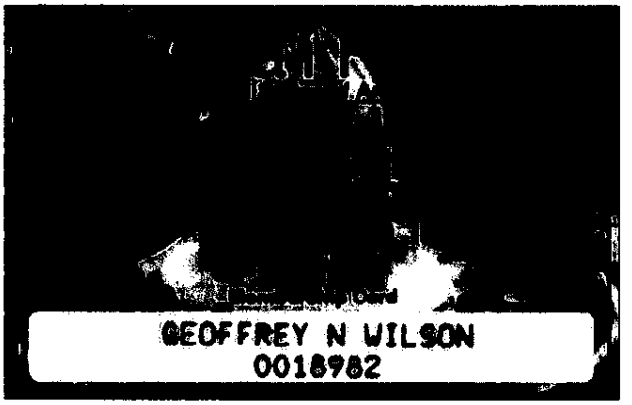
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of Oct, 2006, at Evanston, Illinois.



GEOFFREY N. WILSON

EXHIBIT 1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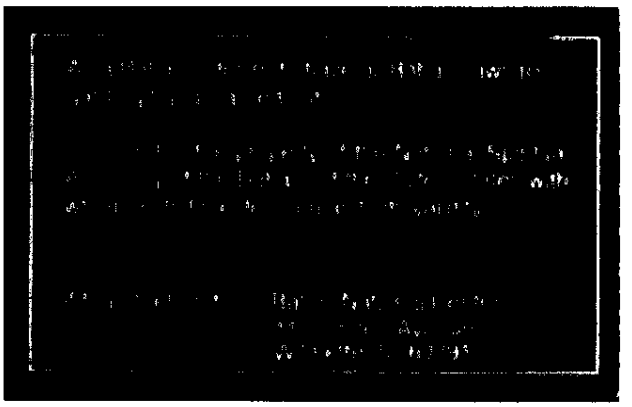


EXHIBIT 2

THE WHITE HOUSE

WASHINGTON

October 6, 1967

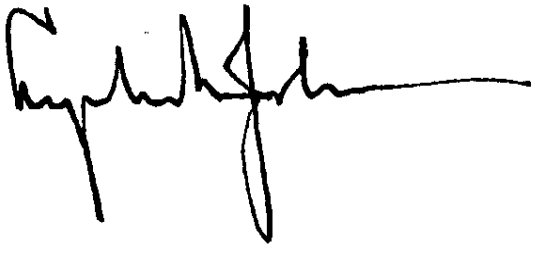
TO THE MEMBERS OF THE NATIONAL ASSEMBLY
OF THE BAHA'IS OF THE UNITED STATES

I am pleased to greet you on this centenary of your eventful history, and to acknowledge the growing good you do.

Yours has been a work of love. You have sown seeds of righteousness and justice, and humanity will reap rich harvests from your toil.

Your purpose is the purpose of America, your hope the hope of men of goodwill everywhere. On every front, our nation presses forward for a world where hatred has no place and where all may walk in peace and live in freedom, decency, and understanding.

All thoughtful and farsighted men respect the mission of your faith. For every one of us looks forward to that day when the earth will truly be one country -- and mankind its citizens.



THE WHITE HOUSE

WASHINGTON

December 27, 1985

Dear Judge Nelson:

I truly valued having you and your colleagues in the National Spiritual Assembly of the Baha'is of the United States at the White House ceremony marking the signing of Proclamation 5420 and the 37th anniversary of the signing of the Universal Declaration of Human Rights.

As the battles for freedom and human dignity continue to rage in countries around the world, the United States will remain loyal to the voices of outcry against the suffering of the Baha'i and other persecuted peoples and always hold fast to the cause of liberty.

Let me express my sincere thanks again for the commemorative plate which you presented to me on behalf of the National Spiritual Assembly and for the statement on world peace from the Universal House of Justice. I am deeply grateful for these expressions of support and friendship.

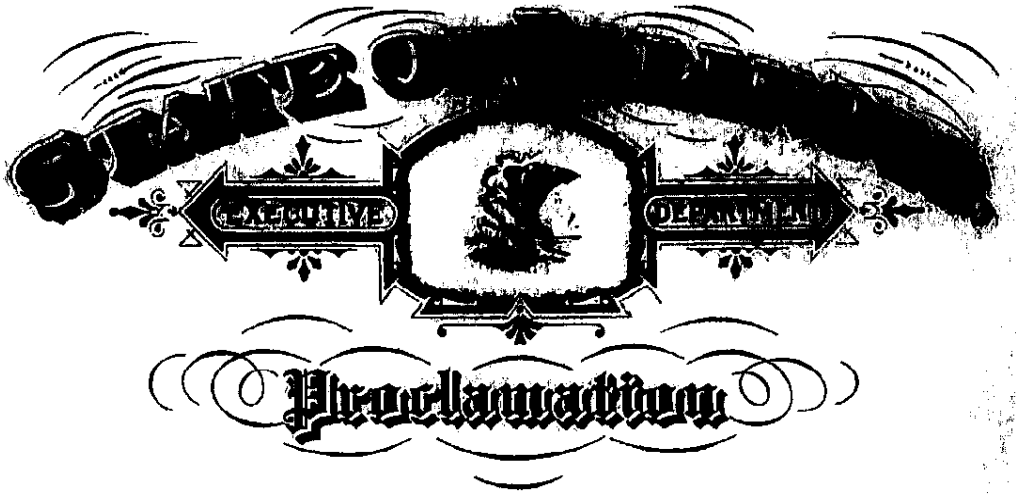
With my best wishes to you and your membership for peace and happiness in the New Year. May God bless you all.

Sincerely,

Ronald Reagan

The Honorable James Nelson
Chairman
National Spiritual Assembly
of the Baha'is of the United States
536 Sheridan Road
Wilmette, Illinois 60091

EXHIBIT 3



WHEREAS, the Baha'is of the United States are celebrating the 100th anniversary of establishment of their religion in North America; and

WHEREAS, the first Baha'i House of Worship in the Western Hemisphere is in Wilmette, Illinois, on the shores of Lake Michigan and the Baha'i National Center is in Evanston, Illinois; and

WHEREAS, the Baha'is are dedicated to universal peace, racial unity, the equality of women and men, and the elimination of all forms of prejudice;

THEREFORE, I, Jim Edgar, Governor of the State of Illinois, proclaim June 26, 1994, as BAHA'I CENTENARY DAY in Illinois in commemoration of this anniversary.

In Witness Whereof, I have hereunto set my hand and caused the Great Seal of the State of Illinois to be affixed.

Done at the Capitol, in the City of Springfield, this SEVENTH day of JUNE in the Year of Our Lord, one thousand nine hundred and NINETY-FOUR and of the State of Illinois, the one hundred and SEVENTY-SIXTH

Jim Edgar

BAHA'I	Renewed	PUBLICATIONS-NAMELY, PAMPHLETS AND BOOKS	806,393	March 29, 1966
THE UNIVERSAL HOUSE OF JUSTICE	Renewed	PUBLICATIONS-NAMELY, PAMPHLETS	799,540	November 30, 1965
	Renewed	INDICATING MEMBERSHIP	804,427	February 22, 1966
	Renewed	PUBLICATIONS-NAMELY, BOOKS, PAMPHLETS, HOUSE ORGANS, AND CIRCULARS	798,811	November 16, 1965
NATIONAL SPIRITUAL ASSEMBLY OF THE BAHÁ'ÍS OF THE UNITED STATES	Renewed	PUBLICATIONS-NAMELY, BOOKS, PAMPHLETS, PERIODICALS, AND CIRCULARS.	794,080	August 10, 1965

	Renewed	PUBLICATIONS-NAMELY, MAGAZINES, AND BOOKS	798,810	November 16, 1965
BAHÁ'Í	Renewed	PUBLICATIONS; NAMELY, BOOKS, PERIODICALS, PAMPHLETS, HOUSE ORGANS AND NEWS REPORTS	556,004	March 11, 1952
بهائی	Renewed	PERIODICAL LITERATURE AND PRINTED BOOKS	316,444	August 28, 1934