

CAUSE NO. [REDACTED]

ITIO [REDACTED] CHILDREN

§ IN THE 6th DISTRICT COURT
§
§ OF
§ [REDACTED] [REDACTED]
§

DECLARATION UNDER PENALTIES OF PERJURY

I, [REDACTED], declare under penalties of perjury that the following information and allegations of this Declaration are true and correct:

1. That I have personal knowledge of the facts stated in this declaration.
2. That I have not been compelled or threatened to sign this declaration in any manner.
3. That I am signing this declaration knowingly, voluntarily, and freely.
4. That I have been Principal, [REDACTED] Elementary School at all times for the last ten [10] years.
5. That [REDACTED] [the Children"] are the children of [REDACTED] s one of my students.
6. That a woman named Tiffany Massey ["Massey"], who identified herself to me as an employee of the Texas Department of Family and Children's Services spoke to me in the Fall of 2016 about the [REDACTED] family.
7. That I have read the transcript of the testimony of Massey before the 6th District Court, Lamar County, on October 5, 2016, a copy of which is attached hereto at Exhibit A and made a part of this *Affidavit*, during which testimony Massey was questioned about information she testified she collected from me about the Children.
8. That Massey's testimony beginning at page 6, line 12 of Exhibit A that I told her "...that [I] have concerns there may be prescription pill abuse..." is wholly, flatly untrue. I did not tell Massey this, I did not intimate this and I communicated no such concern in any other language.
9. Further, I was present when Massey spoke to school counselor [REDACTED] Ms. [REDACTED] did not tell Massey in that discussion "...that [I] have concerns there may be prescription pill abuse...". Further, [REDACTED] did not intimate this, and she communicated no such concern in any other language to Massey in my presence. Still further, [REDACTED] has advised me that she never expressed any such concern to Massey in any other discussion at which I was not present.
10. That I fully understand the contents of this declaration, and I read, write, and speak English.

End of testimony.

DECLARATION

Under 28 U.S.C. § 1746 and Texas Civil Practice and Remedies Code § 132.001 *et seq.*, I declare under penalties of perjury under the laws of the United States and the State of Texas that my name is [REDACTED] [REDACTED] I am over the age of 18 years, and am competent to make this declaration. My date of birth is [REDACTED]

My address is [REDACTED] This document is not a lien required to be filed with a county clerk, an instrument concerning real or personal property required to be filed with a county clerk, or an oath of office or an oath required to be taken before a specified official other than a notary public. I have not been forced to sign this declaration. I declare that under the penalties of perjury that all assertions provided in this document are correct and true.

Executed on the 19th day of January, in Lamar County, Texas.

[REDACTED]