

C. BROWN,	§	IN THE DISTRICT COURT
Plaintiff	§	
	§	
	§	
VS.	§	DALLAS COUNTY, TEXAS
	§	
FIRST BAPTIST CHURCH	§	
OF FARMERS BRANCH,	§	298 th JUDICIAL DISTRICT
Defendant.	§	

AFFIDAVIT OF C. BROWN

STATE OF TEXAS §

COUNTY OF BEXAR §

Before me, the undersigned notary, on this day personally appeared C. Brown, a person whose identity is known to me. Upon her oath, C. Brown said as follows:

1. “My name is C. Brown. I am more than 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. When I was growing up, I was very active in the youth group at First Baptist Church of Farmers Branch. Beginning shortly after my 16th birthday, I was repeatedly sexually abused and sexually assaulted by the youth and education minister at the First Baptist Church of Farmers Branch, who was a person named Tommy Gilmore.

3. After months of abuse, I broke down crying one day at a piano lesson in the church sanctuary. The church music minister, James A. Moore, was my piano teacher. Moore led me from the sanctuary to his church office, and I told Moore about Gilmore’s sexual conduct. Moore said that it would be better if I did not talk about it with anyone else.

4. In early July 2004, I gave [REDACTED] permission to submit a report on my behalf concerning the sexual abuse and sexual assaults perpetrated against me by minister Gilmore when I was a minor. That report was submitted to church and denominational leaders, including the Baptist General Convention of Texas, the Southern Baptist Convention and the First Baptist Church of Farmers Branch.

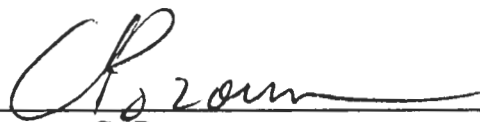
5. By letter of July 26, 2004, the Southern Baptist Convention responded that it had no record of Tommy Gilmore being in a ministerial position in any church. A true and correct copy of that letter is attached to this affidavit at number 3.

6. On December 16, 2004, I received email correspondence from Mr. William Jan Daehnert, Director of Minister/Church Relations at the Baptist General Convention of Texas, in which Daehnert confirmed for me that the Baptist General Convention of Texas had placed Tommy Gilmore into its clergy sexual misconduct file. His email stated that this file works "in an attempt to protect other congregations from being victimized by predators." A true and correct copy of Daehnert's 12/16/2004 email to me is attached to this affidavit at number 1.

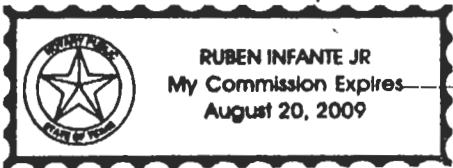
7. During the sixteen months preceding this affidavit, I frequently checked the website of the Baptist General Convention of Texas. The page on the BGCT's website titled "Reporting Requirements for Clergy" was not present in November 2004. I requested of Mr. Wm. Jan Daehnert and Mr. Sonny Spurger at the BGCT that they undertake to provide information to churches about the necessity for reporting to civil authorities when a minister's sexual abuse involves a minor. I first noticed that this information about "Reporting Requirements for Clergy" had been placed on the BGCT's website in approximately late December 2004. Attached to this affidavit at number 2 are true and correct copies of these pages that I printed from the BGCT's website on January 4, 2006, along with true and correct copies of the pages titled "Church Reporting of Clergy Sexual Misconduct" which I also printed from the BGCT's website on January 4, 2006. I printed the preliminary page from the BGCT's website on January 24, 2006.

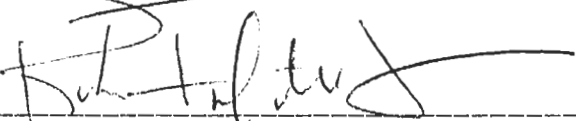
8. In approximately June 2004, I received from [REDACTED] a copy of the BGCT-published booklet, "Broken Trust: Confronting Clergy Sexual Misconduct." A true and correct copy of the booklet I received from [REDACTED] is attached to this affidavit at number 4.

9. In late February 2005, and with no assistance from anyone connected to the church or denomination, I learned that Tommy Gilmore had been working as a children's minister at the First Baptist Church of Oviedo in the Orlando, Florida area. I was able to make a positive identification because his photograph was posted on the website for the First Baptist Church of Oviedo. Subsequently, I learned that he was working in children's ministry at the Cornerstone Community Church of Central Florida and obtained a recording of a sermon delivered by him in which he talks about his work in children's ministry. I was shocked, profoundly upset and extremely worried to learn that, despite my report concerning Gilmore's sexual abuse of me as a minor and despite the Southern Baptist Convention's statement that it had no record of Gilmore being in a ministerial position and despite the BGCT's confirmation that Gilmore had been placed in its file of clergy abusers, Tommy Gilmore was in fact still working in a ministerial position."


C. Brown

2006. SWORN TO AND SUBSCRIBED before me by C. Brown on this the 24 day of January




Notary Public in and for the State of Texas
My commission expires: 6/20/2009