CAUSE NO. DV05-05669-M

IN THE DISTRICT COURT

298th JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

C. BROWN,

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Plaintiff

FIRST BAPTIST CHURCH OF

FARMERS BRANCH and

JAMES A. MOORE, Defendants.

STATE OF TEXAS

repeatedly left messages.

up this matter.

Before me, the undersigned notary, on this day personally appeared Jack Sand, a person whose identity is known to me. Upon his oath, Jack Sand as follows:

1. "My name is Jack Sand. 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. In May 2004, I spoke twice by phone with a person who identified himself as James A. Moore. The second of those phone conversations was on May 18, 2004. The first phone conversation was a week or two prior to that, when I finally reached Moore after having

and Moore said that he did. Moore confirmed that, years ago, Canal Brown had told him about the sexual relationship she had with youth minister Tommy Gilmore. Moore did not want to speak

gained by going into this now?' He stated his view that there was nothing to be gained by bringing

'consensual.' When I pointed out to Moore that C Brown was below the legal age of consent

further at that time, and he asked that I call him back in about a week.

at that time, Moore responded that he was not talking in terms of 'legalities.'

and that he felt uncomfortable talking further about the matter.

In the first conversation, I asked Moore whether he remembered Command Brown,

When I spoke with Moore the second time, he repeatedly asked, 'What's to be

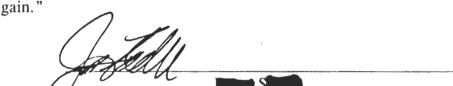
Moore stated that C Brown's relationship with Tommy Gilmore was

Moore told me that he was on staff at the First Baptist Church of Farmers Branch

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- 7. Moore stated that pastor Hayden was now dead so that we would not be able to get any information from Hayden.
- 8. Moore stated that he would call me back in about ten days, but he never called me, and I did not call Moore again."



Notary Public in and for the State of Texas

SWORN TO AND SUBSCRIBED before me by James on this the day of the contraction of the cont

MARIA ISLAS
Notary Public, State of Texas
My Commission Expires
January 08, 2009

My commission expires: 1/8/09