

C. BROWN,
Plaintiff

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IN THE DISTRICT COURT
298th JUDICIAL DISTRICT

v.

FIRST BAPTIST CHURCH OF
FARMERS BRANCH and
JAMES A. MOORE,
Defendants.

DALLAS COUNTY, TEXAS

AFFIDAVIT OF J [REDACTED] S [REDACTED]

STATE OF TEXAS §

COUNTY OF DALLAS §

Before me, the undersigned notary, on this day personally appeared J [REDACTED] S [REDACTED], a person whose identity is known to me. Upon his oath, J [REDACTED] S [REDACTED] said as follows:

1. "My name is J [REDACTED] S [REDACTED]. 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 repeatedly left messages.

3. In the first conversation, I asked Moore whether he remembered C [REDACTED] Brown, and Moore said that he did. Moore confirmed that, years ago, C [REDACTED] Brown had told him about the sexual relationship she had with youth minister Tommy Gilmore. Moore did not want to speak further at that time, and he asked that I call him back in about a week.

4. When I spoke with Moore the second time, he repeatedly asked, 'What's to be gained by going into this now?' He stated his view that there was nothing to be gained by bringing up this matter.

5. Moore stated that C [REDACTED] Brown's relationship with Tommy Gilmore was 'consensual.' When I pointed out to Moore that C [REDACTED] Brown was below the legal age of consent at that time, Moore responded that he was not talking in terms of 'legalities.'

6. Moore told me that he was on staff at the First Baptist Church of Farmers Branch and that he felt uncomfortable talking further about the matter.

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."

[Handwritten signature]

J. S.

SWORN TO AND SUBSCRIBED before me by J. S. on this the 26th day of October, 2005.



Maria Islas
Notary Public in and for the State of Texas

My commission expires: 11/8/09