

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

ALEX WALKER,

Plaintiff,

v.

THREE ANGELS BROADCASTING  
NETWORK, INC., and TOMMY  
SHELTON,

Defendants.

No. 11 CV 4177

Judge Robert M. Dow, Jr.

Magistrate Susan E. Cox

**DECLARATION OF JAMES W. GILLEY**

I, JAMES W. GILLEY, declare as follows:

1. I am the President of Three Angels Broadcasting Network, Inc. ("3ABN") and serve as Chairman of its Board of Directors. I am an adult and am competent to testify of my own personal knowledge to the facts stated in this Declaration.

2. According to 3ABN's payroll records, Plaintiff Alex Walker worked a total of 115 hours for 3ABN over a three-month period from October to December, 2001. He was under the direct supervision of his brother, Brad Walker.

3. The witnesses who would be able to testify about plaintiff's activities during the period he worked at 3ABN, and to directly or indirectly respond to his allegations of abuse at 3ABN's facility and his allegations that 3ABN's knew or should have known that he was at risk of abuse, reside either outside Illinois or in Illinois counties at or adjacent to 3ABN's headquarters in Franklin County, IL.

4. The likely witnesses who reside in Illinois, and their county of residence, include:

a. Brad Walker – Williamson County;

- b. Valerie Walker – Williamson County;
- c. Geneva Walker – Franklin County;
- d. Mollie Steenson - Williamson County;

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- e. Danny Shelton – Franklin County;
- f. Dee Hilderbrand – Franklin County;
- g. Larry McLucas – Franklin County;
- h. Scott Tanner – Williamson County.

5. 3ABN has no physical facilities, regular operations or employees who regularly perform work in the Northern District of Illinois (Greater Chicago Area). Its programming is available to residents of that area to the same extent it is available anywhere else in the United States, i.e., over the internet, via a premium satellite dish network, and through the G-19 satellite system. But 3ABN does not target its programming to residents of the Northern District of Illinois.

6. By contrast, 3ABN has its headquarters and production facility in West Frankfort, IL (Franklin County). It has two satellite downlinks which broadcast 3ABN programming locally, one in Johnston City, IL (Williamson County) and the other in Salem, IL (Marion County). 3ABN also has a full power radio station from which it broadcasts programming in DuQuoin, IL (Perry County). 3ABN has other broadcasting facilities outside of Illinois too.

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

Dated: August 25, 2011

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James W. Gilley