UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

)
Three Angels Broadcasting Network, Inc.,)
an Illinois non-profit corporation, and)
Danny Lee Shelton, individually,) Case No.: 07-40098-RWZ
•)
Plaintiffs,)
V.)
)
Gailon Arthur Joy and Robert Pickle,)
)
Defendants.)
)

AFFIDAVIT OF ROBERT PICKLE

NOW COMES Robert Pickle of Halstad Township, Norman County, Minnesota, who deposes and testifies to the following under pain and penalty of perjury:

- 1. We shall seek to file under seal as **Exhibits A–B** the affidavit and documents we provisionally filed under seal in the First Circuit Court of Appeals on November 19, 2009.
- 2. Attached hereto as **Exhibit C** is the affidavit Plaintiffs' counsel filed on February 7, 2008, in the District of Minnesota, stating in ¶ 12 that MidCountry Bank ("MidCountry") intended to comply with Defendants' subpoena. MidCountry has never asserted ownership of the copies of bank statements we paid it for, and has never asked us to return those copies. As Magistrate Judge Boylan said, "... the subpoena was served on the bank, and they're not even here." (Doc. 212 p. 2).
- 3. I have personally spoken with the following seven individuals who claim to be sexual misconduct victims of Tommy Shelton: Roger Clem, Duane Clem ("Duane"), Brad

Dunning ("Dunning"), T.D., Greg Houseworth, D.C., and Alex Walker. Duane and Dunning are now ordained ministers.

- 4. I have also personally spoken with at least four parents who claim that their children were victimized by Tommy Shelton: Vicki Barnard (mother of D.C.), Charlotte Hopper (mother of Greg Houseworth), B.H. (mother of J.H.), and R.D., father of T.D.
- 5. I have also personally spoken with A.L., a good friend of Carol Shelton ("Carol"), Tommy Shelton's wife, who confirmed earlier reports we had received that Tommy Shelton had molested his adopted son, R.S. A.L. stated that she told Carol, "Tommy could molest your grandchildren," to which A.L. stated that Carol replied, "Don't think I haven't thought of that." A.L. described the depression she has experienced as a result of thinking of the lives of boys she allowed to be injured by her support of Tommy Shelton despite all the allegations.
- 6. Attached hereto as **Exhibits D–E** are the original statements we received from Charlotte Hopper and Duane Clem. Copies of these originals can be found in Doc. 81-2 pp. 26– 28, 33–35.
- 7. Attached hereto as **Exhibit F** is the statement we received from Alex Walker ("Walker"), brother of Tommy Shelton's son-in-law. Walker first contacted us on June 5, 2007.
- 8. Of the alleged victims mentioned herein, all but Duane claim to have been under 18 at the time the alleged sexual misconduct occurred.
- 9. Attached hereto as **Exhibit G** is the Notice of Docket Activity for Appellate Judge Bruce M. Selya's order concerning the Remnant documents being part of the record on appeal.

FURTHER DEPONENT TESTIFIES NOT.

Signed and sealed this 24th day of February, 2010.

/s/ Bob Pickle

Bob Pickle Halstad, MN 56548 Tel: (218) 456-2568

Subscribed and sworn to me this 24th day of February, 2010.

/s/ Lori J. Rufsvold

Notary Public—Minnesota

My Commission Expires Jan. 31, 2015