

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. Attached hereto as **Exhibit H** are certified copies of five felony arrest warrants obtained by the Fairfax County Police Department (“FCPD”) of Fairfax County, Virginia, on February 25, 2010, for the arrest of Tommy Shelton. Tommy Shelton is the brother of Danny Lee Shelton, and has been associated with Three Angels Broadcasting Network, Inc. in one way or another for many years, including working around children. Page 1 of Exhibit H indicates that until trial, Tommy Shelton cannot have contact with children under 15, and must stay in Virginia.
2. Attached hereto as **Exhibit I** is the FCPD press release issued on March 18, 2010, entitled, “Sex Assault Victims Come Forward,” and summarizing the circumstances surrounding Tommy Shelton’s March 16th arrest.
3. It was the subsequent media attention that the above mentioned press release

generated that first alerted Gailon Arthur Joy and myself to the fact that arrest warrants had been issued for Tommy Shelton, and to the fact that Tommy Shelton had been arrested. I then requested copies of the arrest warrants from the Fairfax County Juvenile and Domestic Relations District Court (“Fairfax Court”) by fax on March 22, and received copies of the warrants by U.S. Mail on March 29.

4. The clerk of the Fairfax Court told me that the Fairfax Court only mails out such copies, that it does not fax or email such copies, and that it could take a week after reception of my request before mailing the copies. She also told me that the only documents I would be able to obtain were the copies of the warrants.

5. Attached hereto as **Exhibit J** is the March 29 and 30, 2010, correspondence between Plaintiffs’ counsel and me concerning Defendants’ motion to supplement Defendants’ reply. Plaintiffs’ counsel stated that he would oppose this motion on the following basis: “The information is not relevant to any issue presently pending before the Court, and the rules of civil procedure do not authorize such a motion anyway.”

FURTHER DEPONENT TESTIFIES NOT.

Signed and sealed this 31st day of March, 2010.

/s/ Bob Pickle

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

Subscribed and sworn to me
this 31st day of March, 2010.

/s/ Lori J. Rufsvold

Notary Public—Minnesota

My Commission Expires Jan. 31, 2015