

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 A** is the order invoice I received when I purchased the domain names 3ABNvJoy.info and 3ABNvsJoy.info. From what I recall, and based on a review of the correspondence I received from the domain registrar, from the date of purchase on January 20, 2008, through the date of dismissal on October 30, 2008, I at all times owned and controlled these domain names.

2. Attached hereto as **Exhibit B** is the email Attorney Gregory Simpson (“Simpson”) sent me on January 10, 2010, and my reply. Simpson threatened to sue me for calling him a child molester, something I clearly never did. In his email Simpson forwarded to me an internet post written by alleged Tommy Shelton victim Duane Clem (“Clem”), which quoted me as saying that Simpson had indicated that he was going to still try to cover up the child molestation allegations

against Tommy Shelton. Clem then wrote underneath his quote of me, “Then as far as I’m concerned, Simpson is no better than a child molestor.” (Ex. B p. 2). Since the post Simpson sent to me had Clem’s name cut off, it can’t be seen from the post that I did not write that sentence.

3. Clem later told me that what he meant was that anyone who would cover up such allegations, and thus protect an alleged perpetrator and put children at risk, is responsible for any harm to children that results from that cover up. His reasoning makes a lot of sense to me.

4. Thus far Simpson has not served me with any papers, but if he does, I plan on raising the issue of his conflict of interest in simultaneously representing the Plaintiffs of this case, and I plan on preparing a motion for summary judgment.

5. Early on in this case, probably in January 2008 after a phone conference with Attorney Jerrie Hayes over confidentiality issues, Mr. Joy told me, “They are trying to keep us from getting material into the record.” At that point I didn’t understand what the record was, and couldn’t see the connection between Plaintiffs’ confidentiality designations and Plaintiffs’ obstructing our ability to litigate. But I sure understand the connection now.

FURTHER DEPONENT TESTIFIES NOT.

Signed and sealed this 16th day of March, 2010.

/s/ Bob Pickle

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

Subscribed and sworn to me
this 16th day of March, 2010.

/s/ Lori J. Rufsvold

Notary Public—Minnesota

My Commission Expires Jan. 31, 2015