

AFFIDAVIT

THE STATE OF TEXAS, COUNTY OF _____, CITY OF CARROLLTON

Before me, the undersigned authority, on this _____ day of _____ A.D., 20 _____

Personally appeared [redacted] Date of Birth [redacted]

Driver's License number [redacted]

Home Address [redacted]

Home telephone number _____ Cell or Pager number [redacted]

Business Name and Address none

Business telephone number none

RELATIVE, FRIEND, OR OTHER PERSON THROUGH WHOM YOU CAN BE CONTACTED

Name: [redacted] Address: [redacted]

Home Phone: _____ Alt. Phone: [redacted] Relationship: [redacted]

WHO DEPOSES AND SAYS:

In 1987 I was 15 years old and playing varsity volleyball for Terri Johnson at Newman Smith High School in Carrollton, Texas. I loved volleyball and I began to have aspirations of playing in college that were encouraged by Coach Johnson. Coach Johnson taught me a lot about volleyball and I looked up to her. She was the leader of a team I loved and I played with child-like joy with her providing direction and instruction. It was one of the best times of my life. What I didn't realize at the time was that Coach Johnson had begun grooming me for sexual abuse. Johnson spent time with her volleyball players during and after school hours. She would take her players out in her car and buy us alcohol. We had fun talking, listening to music, doing pranks like taking a construction blinking light. We would go in her car to Addison Airport and watch the planes take off and land. She provided wine coolers and Peach Reunite wine to us girls. Some of the girls I remember doing this with are [redacted] in A [redacted] Johnson often bought the alcohol at a drive through window on Hwy 544. Coach Johnson drove a late model brown Toyota Celica. One time the entire volleyball team was invited to Johnson's apartment to -play board games. I think this was the one time that alcohol was not involved. Lis [redacted] Nan [redacted] there.

During the summer of 1987, [redacted] told me that [redacted] told her that she no longer wanted to spend so much time with her. [redacted] and Johnson had been hanging out, just the three of them that summer, but [redacted] wanted that time to significantly decrease with [redacted] [redacted] was very upset that her two friends didn't want to hang out with her anymore. [redacted] would come pick me up in her car at my parents' house and we'd drive by Johnson's apartment off Trinity Mills Rd. to see [redacted]s car was there. I estimate about 30% of the time we saw [redacted] car at Johnson's apartment. [redacted] told me about her conversation with [redacted] about not spending as much time with her and Johnson... "It's so weird but it feels like I've broken up with a boyfriend." I didn't understand what she meant. I didn't know anything about being gay and didn't know any gay people. I never once thought that N [redacted] and Johnson were having a sexual relationship. It never crossed my mind. I was very naive.

In the fall of 1988, when I was 16 years old, Johnson began asking me personal questions about boyfriends and sex. I had had a few boyfriends but had never had sexual intercourse. The boyfriends I told her about were [redacted] and [redacted]. She asked me about my grades, my relationship with my parents, and teenage

life. She told me she knew I was smart because she had access to all of my grades and they were very good. In February of 1989 she was coaching one of my club volleyball teams and after a tournament I spent the night at her apartment on Trinity Mills. She encouraged me to lie and tell my parents we had gotten home really late and would just sleep at her apartment. Johnson and I stayed up until 3am talking about my life and she presented herself as someone who could be trusted and helpful in achieving my hopes and dreams in volleyball as well as navigating teenage life. After this night, it became a habit for me to stop by her office at Newman Smith High School between classes or before after school started and ended to say hi and have a conversation. It felt good to me that someone I looked up to and respected wanted to speak with me and acted concerned and interested in my life. I thought it was great that my volleyball coach whom I trusted thought so much of me and my volleyball skills that she would help me get a college scholarship and guide me through that process as well as lead my high school volleyball team to win district. During the later Fall of 1989, [REDACTED] and I would ride around with Coach Johnson in her car drinking alcohol Johnson provided. One night after going out drinking with Johnson, [REDACTED] drank so much she was very sick and could hardly play in our volleyball match the next night. It was after that that [REDACTED] said she wasn't going to go out drinking with Johnson anymore. [REDACTED] said she felt it was wrong. When [REDACTED] told me that she was no longer going to participate in drinking with Johnson, I remember thinking "Uh oh, well how do I get out of it too?" I wanted to keep Johnson's favor so that she would continue to believe in me and help me achieve my volleyball dreams.

In January of 1989 I was 16 years old. Terri Johnson picked me up in her brown Toyota Celica at my parents' house, and gave me wine coolers to drink. After a few hours of driving around, drinking and talking, she drove to Addison Airport and parked her car. She then leaned over into the passenger seat where I was sitting and kissed me on the mouth. I remember I felt her prickly moustache on my face. I sat frozen in shock and fear. I didn't say anything. She kissed me again, but again I sat there frozen. Time stood still and my brain checked out. I don't know how long it was before she drove me back to my parents' house, but I don't remember saying another word.

I saw Johnson at school the next day in the upstairs gym of NSHS with no one else around. She told me that unless I was going to go along with her advances, she was going to quit coaching at Newman Smith, not coach my club volleyball team, and move away. I was devastated and scared that without her help I would not get a volleyball scholarship. I also felt that I would be to blame for her leaving my high school team before my senior year when we were expected to do very well in district. For the next two days I was in a daze at school. I remember wondering why no teachers said anything about my in classroom performance. I had always been a good student, but no teacher noticed that I just sat at my desk unable to do anything. All I could think about was that if I didn't go along Johnson's sexual advances she would leave, and she was my biggest ally in achieving my dreams and the leader of the team I loved. I believed my joy of playing volleyball was dependent on her presence by this point. I believed that without her, I could not play at the level I wanted to. Two days after she kissed me, I saw her in the upstairs gym at Newman Smith High School where she was alone and told her she didn't have to leave. I felt like I was almost making a self-sacrifice so that our volleyball team would stay intact and I wouldn't have to give up on my volleyball dreams. I decided that my feelings and desires weren't as important as the dreams I had to achieve. I thought that abuse was better than the alternative. We went to her office where she kissed me on the lips, and touched my breasts. The next day, I resumed my routine of going to her office between classes to talk, but now instead of talking, she would kiss me on the mouth, touch my breasts under my shirt, and reach in my pants and fondle my genitals. During this time, if I didn't stop by her office enough she would complain. She would also write me notes/letters and give them to me to take with me. She never signed her name. I don't remember a lot of details about the notes, but they were usually complimentary of me in some way. She told me not to keep the notes in fear that someone would find them and read them, so I always threw them away immediately.

Terri Johnson told me that in January she had told [REDACTED] who had played volleyball on my 1988 NSHS volleyball team for Johnson and who was a student at Texas A&M by then, that she no longer wanted to have a romantic relationship with her. [REDACTED] told Johnson that the only reason I was involved with her was because I looked up to Johnson and needed the attention and support she provided. When Johnson told me that

that's what [REDACTED] said, I remember thinking "That's exactly true! It's right!" [REDACTED] told Johnson she didn't understand why Johnson wanted to leave a relationship with her that could last forever to be with me when it wouldn't last forever. Johnson told her she didn't care that it wasn't forever.

Johnson told me that she told Ruth Stovall about her plans for me before she kissed me the first time. Stovall advised her not to "do that again" as she had with [REDACTED]. When Johnson began to sexually abuse me as planned, she told Stovall about what she was doing with me. Ruth Stovall was my Health teacher at NSHS. I could tell she knew what was going on, but she never helped me.

The kissing and fondling of my genitals in her office happened 5 times per week and continued from January 1989 until school was out in May 1989.

The kissing and fondling also occurred in her car 1-2 times a week between January-May 1989. She would provide me alcohol and play popular music like Madonna's "Like a Prayer." While driving she would put her hand in my pants and fondle me and wedge her right hand between my left labia and my left leg. We would drive around the Hebron area and on 544. I remember seeing a beautiful old white church.

In May of 1989 I was in the passenger seat of Johnson's car. Johnson's female friend from high school, "Troy" was in the back seat. Johnson reached over and put her right hand in my shorts and began to fondle me. Johnson then pulled me over to sit me on her lap while she fondled me and drove down the highway. I heard Troy gasping with pleasure in the back seat of the car. I kept my eyes closed.

Terri Johnson also coached my club volleyball team, and once school was out she would give me rides to practices and games. She would encourage me to lie to my parents about how late the tournament games or practices were so that she could take me to her house before I had to go home. In her bedroom she would take off my clothes, put me on her bed and perform oral sex on me, digitally penetrate me, kiss me and fondle me. She made me take a shower with her and wash her body including her breasts and crotch. This happened twice a week from May 1989 until August of 1989. I turned 17 on [REDACTED] 1989. In early June of 1989 she used her fingers and hand to digitally penetrate me with such force that she broke my hymen which caused me pain and bleeding. At the time I only knew it hurt and that I was bleeding, but I didn't understand why. After she took me back to my parents' house I went to the bathroom and saw blood in the toilet. I remember my dad being in his home office next to the bathroom. I remember thinking I have to put this out of my head and not think about it anymore.

Johnson moved to a house near Sandy Lake Rd west of I35. Johnson had two roommates: Cathy [REDACTED] and Leslie [REDACTED]. Both were coaches for the CFBISD. [REDACTED] and [REDACTED] saw me at their home repeatedly and saw Johnson touch me inappropriately.

In mid-June of 1989 I was at Johnson's home with [REDACTED] and [REDACTED] also there. A pornographic movie was playing on their TV in their living room. Johnson pointed it out to me. I had never seen pornography before. This movie was showing a man having sex with a woman while a man had anal sex with the man. I was in shock. I couldn't look away. They watched me watch the porn. After a few minutes I got up to go to the bathroom and did not go back into the living room where the porn was playing. Johnson came and found me, took me to her bedroom and performed oral sex on me, digitally penetrated me, kissed me and fondled me.

In July of 1989 Johnson lied to my parents asking them if she could take me to her parents' home in East Texas while they were out of town to do some painting and fix-up work around their house. She drove me to her parents' house and performed oral sex on me, digitally penetrated me, fondled me and kissed me in her parents' bed. She provided me with wine coolers and gave me a drink called a White Russian.

In August I met up with [REDACTED] and [REDACTED] at [REDACTED]'s house where Johnson was house sitting. She provided us with alcohol and drank more White Russians. Johnson told me a story about when she

was in high school, they would go to a store where the owner lived above it. They would bang on the door and call his name until he would wake up and come down to the store to sell them alcohol.

In August of 1989 Johnson gave me alcohol and then drove me to the Oak Lawn area in Dallas, took me to the entrance of a gay bar and begged the doorman to let me in despite the fact that I was underage. I remember being very scared and embarrassed. The doorman refused and I was very very relieved not to have to go in. Johnson was very mad I was not able to get in.

School started again in August 1989 and I was 17 years old. In August-October 1989 I would repeat the pattern that started the year before. I would go to her office between classes where she would kiss me, and fondle my genitals. If the abuse made me late for my next class, she would write me a late pass. My English teacher once put the late pass I had given her into Johnson's work mailbox with a note that said she thought Johnson would want to know that I had been forging late passes in her name. The other routine was that I would go to class 8:30-2:30 then afterwards drive to her house and go into her bedroom where she would digitally penetrate me, fondle me, and kiss me. I would leave her house and drive back to the high school field house to get my ankles taped while she would drive to the gym to start practice. I would arrive for volleyball practice 5-10 minutes late every day but no coach nor any of my teammates questioned why I was always late. This happened 3 times per week from August 1989 until volleyball season was over early November 1989.

Sometime during these few months she replaced her brown Toyota Celica with a new gray Toyota Celica.

Sometime during these few months, Terri Johnson had been very close friends with Coach David, the wrestling coach at Newman Smith High School. They had a major falling out and never spoke again. I don't know why.

In November our volleyball season was over. Johnson took me to watch a high school volleyball playoff game out of town: Arlington vs. Amarillo. It was in an arena. On the way driving to the arena, I told Johnson I wanted the abuse to be over. She was angry with me. During the volleyball game, I went to use the bathroom. Unbeknownst to me, she followed me and busted into my locked bathroom stall. She began kissing me and trying to fondle me. I told her to get out and stop repeatedly. After two minutes of struggle which felt like hours, she finally left the bathroom stall. I was horrified at the thought that someone saw her come into my stall or heard her attempt to abuse me. I got very scared and got insight into the difficulty of getting away from the abuse. During the ride home she asked me if I had changed my mind about the abuse being over and I said that it had, though it hadn't. I was starting to feel like I didn't have to put up with the abuse to be a successful volleyball player. I was getting recruited to play volleyball at many schools. But I was scared of what she would do once it ended.

In January of 1990 I stayed in a hotel room after a club volleyball tournament with [REDACTED] her coach [REDACTED] and Johnson. Johnson and I slept in a bed together and she fondled my genitals.

In May of 1990 I went to Wet n Wild, a waterpark in Dallas, with my friends [REDACTED] [REDACTED] [REDACTED] [REDACTED] and others. We played volleyball there, and a guy named Joe came up to me and gave me his phone number. Once I was home later that day, Johnson called me at my home and yelled at me for having accepted the phone number. It scared me because I don't know how she knew about me receiving the number and that she was very angry.

In May of 1990 I had a full scholarship to play volleyball, I was going to be moving away for college in the Fall, and I was going to do everything I could to enjoy these last weeks of high school including senior walk, senior dinner, and prom. I don't know how but I found the strength to tell Johnson over the phone I wanted the abuse to stop. She was angry. After the phone call was over, my friend [REDACTED] came over and we took a walk together and kissed. It felt like I was escaping a jail. Johnson found out about [REDACTED] and my going to prom with [REDACTED] and she could call me and be angry and write angry letters to me. But the sexual abuse never happened again.

From 1990 until 1993 I thought that since I had gone along with the abuse that no one was at fault. I felt guilty about what had happened to me and I prayed to God forgiveness. I felt alone and suffered from bouts of depression. I endured 3 year abusive relationship with [REDACTED]. I had very low self esteem. I thought if anyone ever found out what happened to me, they would think I was dirty and gross. Johnson kept in touch with me during these years and I longed for the mentor/advocate/role model/friendship we had before the abuse started. Several times we would get together during those years. Sometimes she would be angry that I wanted nothing but friendship, but she didn't not touch me sexually again. I remained somewhat scared of her. Johnson's father died and my mother and I went to the funeral. I told her father I would do my best to help Johnson. Maybe now I finally am helping her. I never told anyone about the abuse. When I needed to cry about it, I would get in my car and drive. I would pray and cry and bang on my steering wheel. Always alone. I suffered and suffered and I was always alone. After a few years, I began to think that what had happened to me wasn't my fault. I started to get angry.

In 1994 [REDACTED] came up to me at a volleyball tournament and asked me, "You were with Terri, right?" I was shocked and just looked at her. [REDACTED] and her friend, [REDACTED] just looked back at me. [REDACTED] told me that she played volleyball for Johnson while Johnson coached at Texas A&M Commerce. [REDACTED] said that she and Johnson had had a romantic relationship but had broken up recently. She said they would fight during volleyball practice. I told [REDACTED] that it was wrong of Johnson to have had any type of relationship with her outside a coach/player one and that [REDACTED] should stay away from her. I told [REDACTED] that no one knew about Johnson abusing me, that I am not gay, that no one knew about the abuse and to please not tell anyone. I repeated that what Johnson did to me and to her was wrong. I walked away in shock. I was terrified that everyone would find out. I was shocked that I had told [REDACTED] what I thought about the abuse. After that conversation with [REDACTED] and [REDACTED] Johnson never contacted me again and I have not communicated with her at all since before that day. I believe that [REDACTED] told [REDACTED] what I had said and Johnson realized that to save her own skin, it was best she leave me alone.

In 1994, about 4 times a week, I would be doing random things and Johnson's face would appear in my mind and my heart rate would spike as I thought about what she did to me. I would visualize chopping her head off with a sword and gouging her eyes out with knives. The pattern was that image of her would appear, my heart rate would go way up, and then I would go after her with violence then my heart rate would slowly come down and I would feel OK again. I started not being able to sleep at night. I graduated from college in 1995 and became depressed on a deeper level. I saw the abuse and violence 2 times a week and felt depressed 2-3 times a week.

In 1995 a [REDACTED], a friend, told me that [REDACTED] had told someone she knew that I was gay. [REDACTED] is [REDACTED]'s sister. I told [REDACTED] that I was not gay and inwardly panicked that someone who knew the secret of the abuse was going to tell all my friends about it. I prayed that no one would ever find out.

In 1996 I saw the images in my head of abuse and violence 1 time per week and felt mildly depressed constantly.

In 1997 I met my husband. I fell in love and lied about my past so he wouldn't be grossed out by me. He told me once that [REDACTED] told him that every girl had had a gay relationship and had I? I answered no, emphatically, and thought that he would probably find out about the abuse and break us with me. I saw the violent images 2 times per week and felt depressed once per week. The violent image/depression level stayed the same until 2005 when my son was born.

After my son was born I had frightening images of someone sexually abusing him. I had these images 2-3 times a week for 5 years. I had violent images about the sexual abuse I endured once a month.

In 2009 I became increasingly depressed and started taking medication for depression. I had violent images about the abuse once a month. I still could not sleep at night, so I took AdvilPM or Tylenol PM every night from 2009 until 2012.

In 2012 I began abusing prescription drugs (vicodin) and had a mental breakdown lasting 3 days. During 2012 I had violent images about the abuse once every 2 months. I still suffered from insomnia.

In 2013 I suffered from depression, had insomnia, and had violent images about the abuse once every 2 months.

In April of 2014 my life began to completely fall apart. I couldn't work, my marriage was suffering, I avoided being around my kids too much in fear that I would mess them up. After two close friends insisted, I sought out a therapist. After 4 weeks of seeing Karen Cogan, the therapist, I waited until there were 2 minutes left in our current session and then I told her about the sexual abuse. Karen was the first person I had ever told about the sexual abuse, and it was 25 years after it happened. I waited until there were 2 minutes left in the therapy session so I only had to deal with her disgust for 2 minutes and then I never had to see her again.

Several days later I told my husband because my issues had almost caused our 15 year marriage to fall apart.

Several days later I googled "Terri Johnson" and saw that she is the volleyball coach at Magnolia High school in Montgomery County, Texas. I gasped. I thought the abuse of high school girls had ended with me.

A couple of days later I called CPS to report the abuse I suffered at her hands. In August of 2014 I discovered that she was still coaching volleyball at Magnolia High School.

April – June 2014 I saw violent images of the abuse once per day.

In June of 2014 while driving on hwy 114 with my husband in the passenger seat, after my husband leaned over and kissed me, I began crying and beating on the steering wheel.

[REDACTED]

[REDACTED]

I'm starting to do better but writing this is crushing me. On the way to meet the teacher night with my kids on 8/21, I started crying and shaking and was very scared to go into the school because it was the first time I had gone into a school since the EMDR therapy had started. Just as I read what I wrote my heart rate spiked and I can images of killing Terri Johnson with knives. I have never, not once, been in a violent altercation in my entire life.

People who knew about the abuse from someone other than me:

Ruth S [REDACTED] – teacher at Newman Smith

Cathy [REDACTED] – roommate and teacher in CFBISD

Leslie [REDACTED] – roommate and teacher in CFBISD

Troy – Johnson's friend

[REDACTED] – pervious NSHS student - [REDACTED]

[REDACTED] –Johnson's student at Texas A&M Commerce - [REDACTED]

People who may have known about the abuse from someone other than me:

[REDACTED] - [REDACTED]'s sister

[REDACTED] - friend

[REDACTED] - [REDACTED]

[REDACTED] friends with [REDACTED] - [REDACTED]

People who I have told about the abuse:

Karen Cogan - [REDACTED]

Tricia Kane - [REDACTED]

[REDACTED] - [REDACTED]

[REDACTED] friend

[REDACTED] - friend

[REDACTED] - friend

[REDACTED] - friend

[REDACTED] - friend

[REDACTED] friend

PEACE OFFICER OF THE STATE OF TEXAS

[REDACTED]
AFFIANT SIGNATURE