

**Sworn Statement prepared for the Thompson County Grand Jury, October 15, 2004
Pat Morton-McCafferty**

Appearing: Brett Franks
Pat Morton-McCafferty:

Q: My name is Brett Franks, attorney for Jaimie Bianco. It is my understanding that you wish to avail yourself of Rule 17c of the Circuit Court of Thompson County, which allows for a witness to submit a sworn statement to either party in a criminal case.

A: That is correct.

Q: You are represented by legal counsel?

A: Yes. My spouse, Jan McCafferty, is representing me at this time.

Q: You prepared a written statement that you wish to submit?

A: Yes. I would find it very embarrassing to have to testify in front of a Grand Jury or in Court.

Q: Do you understand that this statement will not guarantee that you won't have to appear if there is a trial in the case of People of the State of Marshall v. Jaimie Bianco?

A: Yes. I hope this statement will make it unnecessary for this case to go to trial.

Q: O.K. Let's proceed.

Whereupon the witness was duly sworn.

Q: State your name.

A: My name is Pat Morton-McCafferty.

Q: I am showing you a document which you submitted today, captioned as Rule 17 c Statement of Pat Morton-McCafferty. Is this a statement which you caused to be prepared?

A: Yes.

Q: Did you read the document before you signed it?

A: Yes.

Q: Do you swear that the statements contained in that statement are the truth, the whole truth, and nothing but the truth.

A: Yes I do.

Q: Thank you. Do you understand that a copy of this statement will become a part of the record of this proceeding?

A: Yes. But I understand that it is sealed unless the Court rules otherwise.

By Mr. Franks - That will be all.

Wendy Diamond, Official Court Reporter