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SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION

| LEICESTER BRYCE STOVELL |) |
|-------------------------|---------------------------------|
| Plaintiff, |) CIVIL ACTION NO. 13-0002985 |
| V. |) JUDGE: Thomas A. Motley |
| LEBRON R. JAMES | .) Next Event: August 23, 2013 |
| Defendant. |) Initial Scheduling Conference |
| | * * * * * |

AMENDED COMPLAINT

I. <u>STATEMENT OF FACTS.</u>

1. Plaintiff Leicester Bryce Stovell, proceeding *Pro Se*, brings this civil action against Defendant LeBron R. James. Plaintiff is a resident of the District of Columbia. Defendant is a resident of Florida. Based on knowledge and information and belief, Plaintiff Stovell alleges the following:

2. This action arises out of Defendant's statements through Sports Illustrated ("SI") that were published and distributed nationally *via* SI's April 30, 2012 edition, less than one year ago as of the filing date of this action.

3. This Court has jurisdiction herein because Plaintiff is a resident of the

District of Columbia. Although a resident of another State, Defendant's action also affected Plaintiff here in the District of Columbia.

4. In the SI article, Defendant stated that his father had left his mother and him when he was a child, leading to a deprived childhood. In pertinent part, Defendant LeBron James stated the following:

"My father wasn't around when I was a kid, and I use to always say, 'Why me? Why don't I have a father? Why isn't he around? Why did he leave my mother?' But as I got older I looked deeper though, 'I don't know what my father was going through, but if he was around all the time, would I be who I am today?'" James said. "It made me grow up fast. It helped me be more responsible. Maybe I wouldn't be sitting here right now."

4. Defendant LeBron James's statement was published a few days after the Plaintiff herein filed a Notice of Appeal with respect to the United States District Court's March 29, 2012 final order (in U.S. D.C. Case No. 10-CV-01059) dismissing Plaintiff's Complaint there, which had been filed with that court on the jurisdictional basis of federal diversity jurisdiction of the state law claims there at issue.. In that case, Plaintiff alleged that Defendants therein, including LeBron James, had, *inter alia*, defamed Plaintiff herein in making statements to the effect that Defendant LeBron James's father had abandoned Defendant LeBron James and his mother prior to the initiation of that law suit in 2010.

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5. Although the Plaintiff herein referred to Defendant's defamatory statements herein on appeal of that case to the United States Court of Appeals for the District of Columbia Circuit (U.S. Court of Appeals Case No. 12-7034), Plaintiff had not brought the defamation claims in that suit on the basis of the statements complained of herein. Thus, the dismissal of the defamation claims in the federal action do not affect this claim, which is for distinct statements of Defendant James that occurred after the alleged defamation had occurred that was a subject of the federal diversity action.

6. In the federal diversity action filed in 2010, Plaintiff herein also alleged that he likely is the father of Defendant LeBron James. In addition, Plaintiff alleged that Defendant LeBron James likely had falsified an August, 2007 DNA test to ascertain whether Plaintiff herein and Defendant herein are father and son because he, among other things, believes Plaintiff herein is his father.

7. Plaintiff also referenced a number of factors indicating he is Defendant's father, including recalling meeting Defendant's mother, Gloria James, in Washington, D.C. in March, 1984, at which time he alleges they had a sexual encounter, Defendant LeBron James's significant similarity in appearance with Plaintiff, the alliteration in their names, which Plaintiff alleged apparently was intended by Defendant's mother as a concealed indication of Plaintiff's paternal

status, and the fact that Defendant LeBron James seemingly had made a tradition of secretly alluding to Plaintiff as his father by naming his second son "Bryce," Plaintiff's middle name.

8. The federal diversity case received worldwide media attention. Many persons who know Plaintiff became aware of the case, as well as others. In addition, the reports often noted the similarity in appearance between Plaintiff Stovell and Defendant James. Thus, some persons hearing Defendant LeBron James's statements in the widely distributed Sports Illustrated article (which was touted in extensive pre-publication publicity to the effect that in it Defendant LeBron James would "speak about his father") learned of the abandonment charge for the first time from the article and associated the abandonment charge with Plaintiff for the first time.

9. Moreover, others who understood Plaintiff Leicester Bryce Stovell to be Defendant LeBron James's father by other means also were exposed to Defendant LeBron James's statement in the April 30, 2012 SI article to the effect that his father had left him and his mother alone and destitute when he was a child, depriving him of a true childhood (and, presumably, child support as well). In this regard, the circumstances of this matter always have suggested that the Jameses have been telling selected other persons that Plaintiff is Defendant LeBron James's father. Thus, attached at Exhibit 1 is the sworn, notarized Affidavit of Rolando Pharr ("Pharr") a resident of Ohio who knew Defendant LeBron James's mother, Gloria James, while Defendant LeBron James was an infant.

10. Pharr swears under penalty of perjury that Gloria James told him at that time that Plaintiff herein is, in fact, Defendant LeBron James's father. Thus, persons who associated Plaintiff with being Defendant LeBron James's father from reading media reports about the federal diversity action who understood Defendant Lebron James to be referring to Plaintiff in the April 30, 2012 SI article were joined by persons whom the Jameses had told that Plaintiff Stovell is Defendant LeBron James's father, thus leading them to believe that Plaintiff herein abandoned Defendant Lebron James and his mother when he was a child.

11. Defendant LeBron James's published statement is false. Plaintiff did not leave Defendant LeBron James or his mother alone and destitute, or otherwise. Defendant Gloria James never told Plaintiff that Defendant LeBron James is his son. Plaintiff also never otherwise knew of or suspected the relationship until just before he contacted Defendant's attorney in 2007. At that time Plaintiff believes Defendant LeBron James personally falsified the DNA test they'd agreed to take then to ascertain – at least for the Plaintiff herein - whether the father/son relationship exists between the two.

12. The circumstances also indicate that Defendant LeBron James does not even believe that his father actually left him and his mother. In this regard, Plaintiff has noted the lapse in time between when Defendant LeBron James became world famous and when Plaintiff approached Defendant's Counsel in 2007 as indicating that Defendant knew Plaintiff had no suspicion of paternity prior to then, consistent with the fact that Defendant's mother had not told Plaintiff he was a father (but, in fact, had misled him). Thus, Defendant's naming of his second son as Bryce (Plaintiff's middle name) under these circumstances indicates Defendant LeBron James, who reportedly does not want a real (or "biological") father, was convinced Plaintiff did not even know he's Defendant LeBron James's father, and that he could do so without arousing Plaintiff herein's suspicions.

13. Defendant LeBron James's statements complained of herein have harmed Plaintiff. In this regard, it holds Plaintiff out to ridicule among persons positioned to make the connection between Plaintiff and Defendant LeBron James's statement, and there appears to be many. Potential clients of Plaintiff in his law practice even have referenced Defendant LeBron James's false paternal abandonment allegation as a reason for not retaining Plaintiff for certain cases. In addition, the statement holds Plaintiff out to public ridicule on its face.

II.

FIRST CAUSE OF ACTION

(Defamation)

14. Plaintiff restates the allegations of paragraphs 1 through 13 of the Amended Complaint as if fully rewritten herein.

15. Defendant LeBron James msde untrue statements regarding Plaintiff through the April 30, 2012 issue of SI to the effect that his father had left him and his mother alone and destitute when he was a child; that he, in effect, had abandoned them.

16. These statements were made by Defendant LeBron James to SI to be, and were, distributed, at least nationally. These statements, thus, were made to third parties, and without privilege.

17. Defendant LeBron James's statements appear to have been intentionally false. His level of fault in making the statements was at least negligent.

18. The statements were actionable as a matter of law and/or gave rise to special harm to Plaintiff.

III. SECOND CAUSE OF ACTION

(False Light)

19. Plaintiff restates the allegations of paragraphs 1 through 18 of the Amended Complaint as if fully rewritten herein.

20. Defendant LeBron James falsely portrayed Plaintiff to the public as an

abandoner of his child, unwilling to share in his support and upbringing. It even appears that Defendant LeBron James is accusing his father of a crime. Defendant LeBron James was understood by members of the public to be referring to the Plaintiff.

21. Defendant LeBron James's false portrayal of Plaintiff was intentionally false, or at least negliogently and/or recklessly false.

22. Plaintiff was injured by Defendant's portrayal of him in a false light.

IV. **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff demands judgment as follows:

- (a) As to the First Cause of Action, \$500,000 in monetary damages,
- (b) As to the Second Cause of Action, \$500,000 in monetary damages,

Together with punitive damages, plus attorney's fees, interest, costs and such other relief this Court deems appropriate, as justice may require.

JURY DEMAND

Plaintiff also hereby demands a trial by jury.

Respectfully submitted,

Dated: May 1, 2013

Leicester Bryce Stovell, Esq.

Plaintiff, Pro Se, D.C. Bar No. 488149

631 12th Street, N.E.

Washington, D.C. 20002

Tele: (202) 302-0657; Email: Leicester1@aol.com

Certificate of Service

I filed with the Clerk of the Superior Court of the District of Columbia electronically, by CaseFileExpress, and served upon Defendant LeBron James the foregoing Amended Complaint by certified US mail, postage prepaid, care of his Counsel, John A, Burlingame, Esq., Attorney to LeBron James, at Squire, Sanders & Dempsey LLP, 1200 19th Street, N.W., Suite 300, Washington, D.C. 20036 this 1st day of May, 2013.

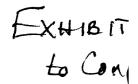
Leicester Bryce Stovell, Esq.

Plaintiff, Pro Se, D.C. Bar No. 488149

631 12th Street, N.E.

Washington, D.C. 20002

Tele: (202) 302-0657; Email: Leicester1@aol.com



DECLARATION OF ROLANDO PHARR

I, Rolando Pharr, swear or affirm that. the following statements are true. They are based on actual events and my recollection of a conversation I had with Gloria James (mother of NBA star LeBron James). Part of that conversation was about LeBron James' father.

1. My name is Rolando Pharr. I am 52 years old and I currently reside in Akron, Ohio.

2. In mid December 1984, while working at the Jeans West clothing store at Public Square in Cleveland, Ohio, I was offered the assistant managers position at The Bottom Half Clothing store inside Rolling Acres Mall in Akron. Ohio. Both stores were owned by Edison Brothers Apparel. I accepted the position and started working at the Bottom Half the last weekend of 1984

3. I met Gloria James a few weeks after I started at The Bottom Half. She came in and asked me if we were hiring. She introduced herself as Nikki but soon revealed her real name to be Gloria James. I told her we weren't hiring at the time but to put in an application and check back periodically. She informed me that she had already put in an application when my manager Mike Smolinski was working. She just wanted to verify that we really weren't hiring.

4 Over the next few weeks. Gioria James would stop in and say heilo. On at least one of those occasions she had LeBron with her. She let me see him and as I do with every baby I meet, I introduced myself and shook his hand.

5. Right around this time my manager informed me that he would be off for a while. He was a diabetic, had cut his leg and it was grossly infected He told me that he was going to be hospitalized and then recovering at home. There was no set time frame for when he would return. The regional manager, Charles Krause, promised to get me some help, but he didn't.

6. The next time Gloria James stopped in I explained the situation and asked her if she would be interested in helping me sometumes. She was. We agreed that she would try to come up on Tuesdays or Wednesdays and every Saturday. She would run errands for me to the bank, our sister store Jeans West and pick up my lunch, usually from Friendly's or Der Dawg Haus. She would also help clean the store. I was going to pay her cash out of my pocket. She would be there no more than two hours per day. What I usually did was give her \$20,00 to pay for my meal and she would keep the change

7. During the first extended conversation that Gloria James and I had the subject of LeBron's father came up. We were standing by the counter near the front of the store. basically just talking and getting to know one another. I lived in Akron off and on from 1978 to 1983 so I knew a lot of people around the city. I also have numerous relatives in Akron. Through our conversation I found out we knew a few of the same people

8. I was asking the majority of the questions. I had a friend in Cleveland, Ohio named Paul James. I asked Gloria James did she know him or his family. She said no

9. I asked Gloria James about LeBrons' father. I wanted to see if I knew him. She assured me that I didn't. I remember telling her "You don't know who I know." She told me I didn't know him because he lived in Washington D.C. I asked her what she knew about Washington D.C. She told me that she visited there fairly often.

10. I asked Gloria James what was LeBrons father's name. The name she told me was very unique and uncommon. I clearly remember saying "that's a fucked up name". I told her it was a good thing that she didn't name LeBron a Junior after his dad because he would be fighting in school every day. She and I both laughed.

11 I honestly could not have recalled LeBron's fathers name in a general conversation before 2010 In 2010, I came across information about a Washington D C. attorney who clauned that he was LeBron James' father After hearing and seeing the name Leicester Bryce Stovell, I remembered that was the unique and uncommon name that Gloria James said was LeBrons father. It is the name I said was a "fucked up name". It is also the name that I said LeBron would have been fighting everyday had he been named a Junior after it.

12. I remember asking Gloria James if she liked the Chrysler LeBaron and if that was where she got LeBrons name from. She told me that she did like the LeBaron but that is not where she got LeBrons name from . She explained that LeBron's name was a combination of his fathers first and middle names. She actually took the time to spell out the fathers name and show me exactly how she came up with LeBron. Leicester Bryce is the name Gloria spelled out for me when she explained how she created the name LeBron. I told Gloria that I like the name LeBron and the way she came up with it

13. At some point during that conversation I asked Gloria James "How old is LeBron s dad?" She told me that he was older than I was. I was 24 at the time.

14. I have taken and passed 2 polygraphs based on other events and conversations I had with Gloria James during that same time period. See attached Exhibits A and B.

Further affiant saith not.

I SWEAR OR AFFIRM TO UNDER PENALTY OF PERJURY THAT THE ABOVE AND FOREGOING REPRESENTATIONS ARE TRUE AND CORRECT TO THE BEST OF MY RECOLLECTION, KNOWLEDGE, AND BELIEF.

+ phan-2013 Rolando Pharr

STATE OF OHIO

COUNTY OF CUYAHOGA

I, the undersigned Notary Public, do hereby affirm that Rolando Phart personally appeared before me on the $\frac{24}{4}$ day of $\frac{4971}{20/3}$, and signed the above Affidavit as his free and voluntary act and deed.

Notary Public



BRIAN F. CHAMBERS NOTARY PUBLIC, STATE OF OHIO Recorded in Cuyahoga County My Comm. Expires 04/25/2017 Case 1:13-cv-00731 Document 1-1 Filed 05/21/13 Page 16 of 23



SECURITY & POLYGRAPH CONSULTANTS, INC.

25200 Miles Road • Cleveland, Ohio 44146 (216) 831-3447 Fax (216) 360-9218 (800) 586-3884 (Ohio Only)

October 18, 2010

Rolando Pharr Cleveland, Ohio

RE: Rolando Pharr DOB 1-29-61

To whom it may concern:

On Friday, October 15, 2010 at 10:00 A.M. Rolando Pharr was voluntarily present at our office for a specific issue polygraph examination-interview, regarding specific events that occurred with Lebron James when he was three months old.

Prior to the examination-interview, Rolando Pharr signed a waiver / release form stating he was taking the examination-interview voluntarily. This signed form is incorporated in our case files. The test was administered by Keith Lowry, Certified Examiner.

Mr. Lowry, President of Security and Polygraph Consultants, Inc., is a graduate of Zonn Institute of Polygraph, Miami, Florida. He received his certification through the American and Ohio Polygraph Associations and currently maintains membership in both organizations. Mr. Lowry has a previous law enforcement background and currently conducts examinations for over thirty local and federal law enforcement agencies.

Mr. Lowry's extensive experience as a Polygraph Examiner are diverse in nature. He has done extensive testing for Prosecutors and Police Agencies, Criminal Defense Attorneys, the Public Defender Office, Alcohol Tobacco & Firearms, Drug Enforcement Agency and the Ohio Attorney General's Office. Mr Lowry has advanced and specialized training in the investigation, interviewing, interrogation and testing of pedophiles, sexually violent offenders, and homicide suspects, to name a few. He also has specialized and advance training in question formulation, chart interpretation and counter measure recognition. Constantly continuing his education, Mr. Lowry attends professional seminars at both the state and national level regularly and has conducted over 20,000 examinations to date.

PRE-TEST INTERVIEW

An extensive pre-test interview was conducted and questions concerning this matter were discussed. Mr. Pharr stated the purpose for taking a polygraph examination was to verify to LeBron James, that a series of events took place, that may have affected the course his life has taken and will take in the future. Mr. Pharr said, he is not implying that Mr. James has become what he is due to these events, only that he is simply stating the facts. Please refer to the attached "Christening Story" for further details.

Proper test questions were formulated at this time.

Drug Screening

Exhibit

Specific

• Pre-employment

Psychological Testing

• Periodic

Rolando Pharr October 18, 2010 Page 2

PROCEDURE

A Stoelting Ultrascribe Model No. 8044-2882, Four channel polygraph was used in a detection of deception technique. This technique involves the recording of emotional responses to normal, control, relevant and irrelevant questions involving the measured changes in blood pressure, pulse rate, respiration and electrodermal phenomenon.

POLYGRAPH EXAMINATION

A polygraph examination was conducted using the formulated guestions. Two charts were generated and examined. There were indications of truthfulness on the polygram tracings.

CONCLUSION

It is my professional opinion that Rolando Pharr was truthful throughout the polygraph examination-interview .

Respectfully submitted, SECURITY & POLYGRAPH CONSULTANTS, INC.

Keith H. Lowry Certified Examiner

Rolando Pharr October 18, 2010 Page 3

RELEVANT QUESTION FORMAT

Do you intend to lie to me during this test ? Answer: No

Regarding this issue do you intend to answer truthfully each question about that ? Answer: Yes

When you were four or five years old did boxing legend Cassius Clay (Muhammad Ali) pick you up and carry you around ? Answer: Yes

Were you the Assistant Manager at the Bottom Half clothing store inside Rolling Acres Mall in Akron, Ohio from late December, 1984 to April or May 1985 ? Answer: Yes

Did you ever watch LeBron James while Gloria James ran store errands for you ? Answer: Yes

Did you raise LeBron James in the air " Kunta Kinte " style three separate times and say, " I christen thee the next Dr. J " each time ?

Answer: Yes

Did the members of Free Afrika toast LeBron, " To the next Dr. J " after the second time you raised him up ? Answer: Yes

Did Gloria James witness the third time you raised LeBron in the air and said, "I christen thee the next Dr. J " ? Answer: Yes

Did you and Gloria James discuss the "Christening ", LeBron's NBA future and who Dr. J was ? Answer: Yes

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SECURITY & POLYGRAPH CONSULTANTS, INC.

25200 Miles Road • Cleveland, Ohio 44146 (216) 831-3447 Fax (216) 360-9218 (800) 586-3884 (Ohio Only)

POLYGRAPH WAIVER AND RELEASE

October 15, 2010 DATE: _____

TIME IN: 10:00 A.M.

I, <u>Rolando Pharr</u> do hereby voluntarily, without duress, coercion, promise of reward or immunity, agree and stipulate to take a polygraph (truth verification) examination, having had said technique explained to my satisfaction, I hereby release Polygraph Consultants, Inc., <u>Personal Issue</u> and the examiner administering this examination from all claims resulting from, or arising out of this examination. I consent to the use of electronic recording devices in conjunction with said examination. I understand fully that I can terminate this examination at any time by so stating. To the best of my knowledge at this time I have no mental and/or physical condition which would prevent me from taking this examination.

| PERSON BEING EXAM | MINED: | Rolanda | Philtre | Rolando | Pharr | |
|-------------------|--------|---------|-----------|---------|-------|--|
| WITNESSED BY: | K | \sum | haun, | | | |
| | | | (Exarivin | er) | | |

The examination now being over, I hereby certify that I took the same voluntarily, was well treated and remained of my own free will, knowing I could leave at any time. I also certify that there were no threats, promises, or harm done to me during the entire period I have been here, either in connection with the examination or my again signing this waiver/release form.

| PERSON BEING EXAMINED: Rolando Phone | Rolando Pharr | |
|--------------------------------------|---------------|---|
| VO - L | | |
| WITNESSED BY:(Examiner) | | - |
| TIME OUT: | | |

• Drug Screening
• Psychological Testing
• Specific
• Pre-Employment
• Periodic

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*Case 1:13-cv-00731 Document 1-1 Filed 05/21/13 Page 20 of 23



SECURITY & POLYGRAPH CONSULTANTS, INC. 25200 Miles Road • Cleveland, Onio 44146 (216) 831-3447 Fax (216) 360-9218 (800) 586-3884 (Onio Oniv)

RE:

Rolando Pharr DOB 1-29-61

March 9, 2012

Rolando Pharr

Cleveland, Ohio

영양은 이상은 가격 것이 있다. 것이 있다. 같은 이 물론이 있는 다음 것이 가격했다.

Drug Screening

Specific

To whom it may concern:

On Tuesday, March 6, 2012 at 12:10 P.M. Rolando Pharr was voluntarily present at our office for a specific issue polygraph examination-interview, regarding a specific event that occurred between he and Gloria James (mother of NBA star LeBron James) when LeBron was three months old. Please refer to the attached "Christening Story" and the results of a polygraph examination interview given by this office on October 15, 2010

Prior to the examination-interview, Rolando Pharr signed a waiver *I* release form stating he was taking the examination-interview voluntarily. This signed form is incorporated in our case files. The test was administered by Keith Lowry, Certified Examiner,

Mr. Lowry, President of Security and Polygraph Consultants, Inc., is a graduate of Zonn-Institute of Polygraph, Miami, Florida. He received his certification through the American and Ohio Polygraph Associations and currently maintains membership in both organizations. Mr. Lowry has a previous law enforcement background and currently conducts examinations for over thirty local and federal law enforcement agencies. Mr. Lowry's extensive experience as a Polygraph Examiner are diverse in nature. He has done extensive testing for Prosecutors and Police Agencies, Criminal Defense Attorneys, the Public Defender Office, Alcohol Tobacco & Firearms, Drug Enforcement Agency and the Ohio Attorney General's Office. Mr Lowry has advanced and specialized training in the investigation, interviewing, interrogation and testing of pedophiles, sexually violent offenders, and homicide suspects, to name a few. He also has specialized and advance training in question formulation, chart interpretation and counter measure recognition. Constantly continuing his education, Mr. Lowry attends professional seminars at both the state and national level regularly and has conducted over 20,000 examinations to date.

Pre-employment

Psychological Testing

Periodic

Exhibit B Rolando Pharr March 9, 2012 Page 2

PRE-TEST INTERVIEW

An extensive pre-test interview was conducted and questions concerning this matter were discussed. Mr. Pharr stated his purpose for taking a second polygraph examination is to continue supporting the "facts" about LeBron's "Christening Story ". Mr. Pharr thinks that Gloria James will remember the financial arrangement they made. Mr. Pharr believes the polygraph results will verify the fact that a financial agreement was indeed made between he and Gloria James. Mr. Pharr also stated that he would like to have a face to face meeting with LeBron James.

Proper test questions were formulated at this time.

PROCEDURE

A Stoelting Ultrascribe Model No. 8044-2882, Four channel polygraph was used in a detection of deception technique. This technique involves the recording of emotional responses to normal, control, relevant and irrelevant questions involving the measured changes in blood pressure, pulse rate, respiration and electrodermal phenomenon.

POLYGRAPH EXAMINATION

A polygraph examination was conducted using the formulated questions. Two charts were generated and examined. There were indications of truthfulness on the polygram tracings.

CONCLUSION

It is my professional opinion that Rolando Pharr was truthful throughout the polygraph examination-interview .

Respectfully submitted, SECURITY & POLYGRAPH CONSULTANTS, INC.

Keith H. Lowry **Certified Examiner**



Rolando Pharr March 9, 2012 Page 3

RELEVANT QUESTION FORMAT

Do you intend to lie to me during this test ? Answer: No

Regarding this issue do you intend to answer truthfully each question about that ? Answer: Yes

Did you tell Gloria James that LeBron James would be an NBA star ? Answer: Yes

Did you tell Gloria James that LeBron James would be a high flying player like Dr. J ? Answer: Yes

Did six members from the "Free Afrika " basketball team participate in LeBron's " Dr. J Christening "?

Answer: Yes

Was it agreed when LeBron became an NBA star, each person who participated in his " Dr. J Christening " would be made a millionaire ? Answer: Yes

Was the agreement with Gloria James confirmed with a handshake ? Answer: Yes Case 1:13-cv-00731 Document 1-1 Filed 05/21/13 Page 23 of 23



SECURITY & POLYGRAPH CONSULTANTS, INC.

25200 Miles Road • Cleveland, Ohio 44146 (216) 831-3447 Fax (216) 360-9218 (800) 586-3884 (Ohio Only)

POLYGRAPH WAIVER AND RELEASE

March 6, 2012

DATE: _____

TIME IN: 12:10 P.M.

I, <u>Rolando Pharr</u> do hereby voluntarily, without duress, coercion, promise of reward or immunity, agree and stipulate to take a polygraph (truth verification) examination, having had said technique explained to my satisfaction, I hereby release Polygraph Consultants <u>Personal Issue</u> and the examiner administering this examination from all claims resulting from, or arising out of this examination. I consent to the use of electronic recording devices in conjunction with said examination. I understand fully that I can terminate this examination at any time by so stating. To the best of my knowledge at this time I have no mental and/or physical condition which would prevent me from taking this examination.

| PERSON BEING EXAMINED |): Robardo | Charr | Rolando | Pharr |
|-----------------------|------------------|-----------|---------|-------|
| WITNESSED BY: | $\hat{\bigcirc}$ | Pour | | |
| | | (Examinat | Ŷ | |

The examination now being over, I hereby certify that I took the same voluntarily, was well treated and remained of my own free will, knowing I could leave at any time. I also certify that there were no threats, promises, or harm done to me during the entire period I have been here, either in connection with the examination or my again signing this waiver/release form.

| PERSON BEING EXAMINED: Rolando Phore Rolando Phore |
|---|
| WITNESSED BY: |
| TIME OUT: A.M. |
| • Drug Screening • Psychological Testing • Specific • Pre-Employment • Periodic |

C:\Security&Polygraph\New&CorrectedForms\PolyWaiv&Rel