

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

JAY CAMPBELL AND
KIRK LANE

PLAINTIFFS

vs.

NO. LR-C-97-0328

CITIZENS FOR AN HONEST GOVERNMENT, INC.,
d/b/a INTEGRITY FILMS; JEREMIAH FILMS, INC.;
AND PAT MATRISCIANA

DEFENDANTS

AFFIDAVIT

I, John Brown, after being duly sworn, state:

1. My name is John Brown.

2. I have been named by Pat Matrisciana as a source of information for allegations pertaining to Jay Campbell and Kirk Lane contained in a video entitled Obstruction of Justice and produced by Mr. Matrisciana.


3. Pat Matrisciana asked me about a statement that people allegedly meeting the description of Jay Campbell and Kirk Lane pulled up next to a telephone booth where Kevin Ives and Don Henry were; grabbed the boys; threw them in the back of a police car; and drove away with them on the night of the boys' death and I told him that any such statement was uncorroborated and I did not think that there was anything to it.

4. I also told Mr. Matrisciana that he should not implicate Jay Campbell or Kirk Lane as being involved in the deaths of Kevin Ives and Don Henry because there was no documented justification for such an implication. I warned him against making such a statement in the video and told him that if he made such statements he would be sued. In fact, prior to the video being produced I even informed Mr. Matrisciana that I had a signed confession from an individual

(unrelated to Jay Campbell and Kirk Lane) taking responsibility for the deaths of Kevin Ives and Don Henry.

5. I have watched the video and since watching it have not told Pat Matrisciana that the statements in the video pertaining to Jay Campbell and Kirk Lane are true. After watching the video I did notice, however, that the portions of the video containing statements from me were edited and spliced to give the appearance that I made a statement that was never made by me.

Further, affiant sayeth not.



John Brown
DATE: March 19, 1998

VERIFICATION

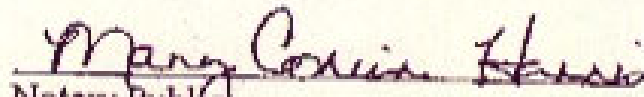
STATE OF ARKANSAS

COUNTY OF PULASKI

I, John Brown, do hereby state that the statements and allegations contained in the above and foregoing document are true and correct to the best of my knowledge and belief.


John Brown

SUBSCRIBED AND SWORN to before me this 19th day of March,
1998.


Notary Public

My Commission Expires: 01

