

Wilmington, Ohio, having moved there from Bowie, Maryland. Before our move to Ohio, I served as Pastor at Reformation Lutheran Church. I am currently unemployed.

3. I am a defendant in the Oregon case, which is currently pending on appeal in the United States Court of Appeals for the Ninth Circuit after a previous remand. To my knowledge, I am the only defendant from the Oregon Case being pursued in this collection action in the U.S. District Court for the Southern District of Ohio.

MY CONDUCT WHICH LED TO CIVIL LIABILITY IN THE OREGON CASE.

4. I served four years in a federal prison from July of 1985 until May of 1989 after being convicted on various counts in connection with the destruction of several abortion facilities. I have been neither charged with nor convicted of any crime since my release in May 1989, nor have I committed or threatened violence against any abortionist or anyone else.
5. The Plaintiffs in the Oregon Case are four abortionists (Robert Crist, Warren Hern, James Newhall, and Elizabeth Newhall) and two abortion clinics/promoters (Planned Parenthood of the Columbia/Willamette, Inc. and Portland Feminists Women's Health Center). Prior to being found liable for a multi-million dollar judgment in the Oregon Case, I had never met, seen, spoken to, been in the presence of, phoned, faxed, written to, mailed to, or picketed the home or workplace of any of the Plaintiff abortionists or clinics. Nor did I engage or conspire with any other person or entity to do so on my behalf. Moreover, prior to being sued by the Plaintiff abortionists and clinics in this action in 1995, I had not entered the states of Washington or Oregon since 1959, when I lived in Seattle at age seven as the son of Lt. Joseph Bray while he taught Naval ROTC at the University of Washington. Nor did I travel there to attend my trial in the Oregon Case, being financially unable to do so.