

STATE OF SOUTH CAROLINA)	SIXTEENTH JUDICIAL CIRCUIT
)	
COUNTY OF YORK)	COURT OF GENERAL SESSIONS
)	
STATE OF SOUTH CAROLINA,)	2009-GS-46-2695
)	2009-GS-46-2696
Prosecution,)	
vs.)	
)	
TAYLOR DURDEN,)	
)	
Defendant.)	AFFIDAVIT OF ALEX RICHARDS
)	

COMES NOW THE AFFIANT SWORN AND STATES THE FOLLOWING:

1 1. My name is Alex Richards, and I am the president of the Chi Si Chapter of
2 Epsilon Sigma Epsilon honors society here at Daniel Morgan University. I turned 22 on
3 December 9, 2009. During the school year I live at the ESE house at Daniel Morgan
4 University. During the summer I typically travel out of the country to see more of the
5 world. I am a senior with a 4.0 GPA, and have already been accepted to law school
6 once I graduate. I have been in ESE for three years now. I was elected pledge master
7 for a year before running for and being elected president of the chapter.

8
9 2. Though we have Greek letters identifying us, much as the traditional
10 fraternities and sororities do, we are quite a bit different. First, we are co-ed. Second,
11 we have much higher GPA standards than any of those groups. And finally, we do true
12 services for the community. We have a few other things in common with the traditional
13 Greek organizations on campus. Our officers are all required by the University to attend
14 the same trainings as traditional Greek organizations. We are an organization that gains
15 membership by invitation only based on brains; not necessarily beauty or popularity.
16 I have greatly enjoyed my time here at Daniel Morgan University. I have worked hard to
17 move up through the ranks of the ESE honors society. This year, I became president of
18 the Chapter, and had some great plans for the year. Things have really derailed since
19 then.

20
21 3. Taylor Durden joined ESE at the same time that I did. Taylor was always
22 more happy working with the new members, or pledges as they are often called. Taylor

23 just loved the process of screening and admitting new members, and some of the fun
24 things to build unity within ESE. Taylor learned the ropes of being the pledge master like
25 I did, from Jessica's older brother Colt. Colt put us through the paces of the Water
26 Jeopardy game. Taylor was miserable after we were done that day, but Taylor and Colt
27 became fast friends after the experience. They began to hang out all the time together.
28 I am willing to bet Taylor was with Colt when the University Police golf cart was stolen.

29

30 4. Every year there is a type of ESE Pledge Olympics. All of the ESE officers
31 review the proposed activities to make sure that we do not run into trouble with the
32 University's hazing policies. Until this year, we have never even had a visit from the
33 University Police Department, much less been sanctioned in any way by DMU
34 Administration. Last year when I was pledge master, everyone had a great time and
35 nobody died from Water Jeopardy. It is awful that Taylor cannot say the same this year.

36

37 5. This year, Taylor seemed fixated on pushing the pledges further than we had
38 before. I said it was not a good idea and even thought the Water Jeopardy that Taylor
39 was so fond of was probably close to hazing. I even told Taylor about a lady I had read
40 about dying from drinking too much water and not going to the bathroom as a part of a
41 radio contest to win a Nintendo Wii. Taylor insisted that Water Jeopardy was not hazing
42 because it was voluntary and that nobody was told they could not go to the bathroom,
43 but that s/he would call the University Student Affairs Office to ask. I have no idea if
44 Taylor ever did call, or what they even said. Either way, Taylor said s/he was moving
45 forward with the Water Jeopardy. We argued about it, and I decided that I did not want
46 to be present for the game. I probably should have double checked behind Taylor, but
47 I had been busy settling back into the fall semester routine. I was around for most of the
48 other pledge week activities, and they all seemed to go pretty well. Everyone was
49 having a good time, especially with the shaving cream fight.

50

51 6. When the Water Jeopardy game started, I headed upstairs to my room to
52 study. After awhile, I heard Tammy Canes yelling for a phone and to call 911. Tammy
53 looked lost wandering around the house when I came downstairs and I realized that she
54 had never been inside the main portion of the house since she was just a pledge.
55 I called 911, while asking what the problem was. Tammy said that one of the pledges
56 passed out. That happens to people from time to time, but they could not get her to

57 wake up. That scared me. I went down to the basement level with Tammy, and we
58 opened up the outside doors of the basement and everyone waited on EMS. Taylor and
59 a couple others were trying to wake Jessica up the whole time. EMS arrived, and took
60 Jessica out on a stretcher. She had been a quiet and somewhat silly person, and was
61 not taking the pledge process seriously enough for Taylor all week long. I am sure that
62 Taylor was punishing her with Water Jeopardy. The cop thought it might have been an
63 alcohol poisoning and hazing incident, since it was pledge week all over campus.
64 Before Sgt. Knight left, Taylor and I were interviewed about what happened. Sgt. Knight
65 asked if it was okay to search the house for alcohol since there were appearances that
66 alcohol could be involved. Taylor and I both told the cop to feel free to search the
67 house, so Sgt. Knight and Cpl. Dechane did. They of course did not find anything.
68 I found out later that evening from the University Director of Student Affairs that Jessica
69 died.

70
71 7. A couple days later, Sgt. Knight and another officer came back to the house
72 and said that Water Jeopardy was considered hazing and manslaughter. They said the
73 water was forced on Jessica and that she died from the excessive water and it was our
74 fault. They arrested Taylor for it, and took me down to an interview room at the police
75 department. I was told that because I was the chapter president and it happened while
76 I was responsible for the honors society, that I could be held responsible too. The police
77 gave me a choice. I could sit at the prosecution table or the defense table. You do not
78 have to have a 4.0 in aerospace engineering to realize the implications of that decision.
79 I am sure it was Taylor's meanness and pushing events too far that got Jessica Bateson
80 killed. I am sitting at the right table.

WITNESS ADDENDUM

I have reviewed this statement, and I have nothing of significance to add at this time.
The material facts are true and correct.

Signed,

Alex Richards

Alex Richards

SIGNED AND SWORN to me before 8:00a.m. on the day of this round of the 2010
South Carolina Mock Trial Competition.

C.M. McCormack

C.M. McCormack, Notary Public

State of South Carolina

My Commission Expires: 07/25/16