

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 CARSON BAKER
)	

COMES NOW THE AFFIANT SWORN AND STATES THE FOLLOWING:

1 1. My name is Carson Baker. I am 20 years old, and a junior at Daniel Morgan
2 University. I live in the South Quad dormitory. I am in my second year as a member of
3 Epsilon Sigma Epsilon honors society. I have known Taylor since I was a freshman.
4 Taylor was a student assistant to the professor in my University 101 class, and we have
5 been friends ever since. I think Taylor is crazy about the rules and rituals of the ESE,
6 but that has not caused any problems in our friendship. Taylor learned all these rules
7 and rituals from Colt Bateson. Even though Colt was Taylor's pledge master, they
8 became good friends even after the pledge week initiation chaos, so I do not think Taylor
9 would have done anything to deliberately hurt Jessica Bateson. Colt and Taylor had
10 some fun at DMU, but they are really good guys. Colt is a strong American who felt the
11 call to service so much that he joined the Army right after college, and is currently
12 serving in Afghanistan.

13
14 2. For me, membership in the ESE is something that I can point to on my
15 resume after college. I did not and do not care about the socials and all the other
16 events. It is just a resume builder for many of us. It makes us look good. Taylor
17 encouraged me to join ESE. I gave it considerable thought and decided to join. I told
18 Taylor up front that I was not going to do all the foolishness and junk that they try to push
19 off on the pledges. Taylor didn't like it, but ultimately had no choice, since it even says in
20 the charter for ESE that being a member is only dependent upon maintaining a certain
21 GPA, and paying dues to the charitable funds account. They use those funds to pay for

22 supplies for the Habitat for Humanity projects and so on. There are several of us each
23 year that join, but never do the activities or move into the house.

24

25 3. One of the forms that we all sign when we are joining tells us that we do not
26 have to do any of the games or pledge activities and that the activities are for building
27 unity within ESE. Taylor and Alex have not gotten along as long as I have known them.
28 Alex thinks s/he is going to save the world and that EVERYTHING we do has to be
29 linked to that goal. Alex and Taylor have fought before because the games and
30 activities that Taylor organizes take up too much of ESE's time. On top of that, they
31 worked together on the pledge class last year when Alex was the pledge master. Taylor
32 did not push the limits any further than Alex did last year. In fact the two were always at
33 each other's throats about one thing or another. Some people just cannot get along.
34 Alex even said to Taylor at the last ESE mandatory meeting before pledge week started
35 that there was no way Taylor could top the pledge week of last year. I do not know if
36 Alex meant the number of pledges or the kind of activities for pledge week.

37

38 4. I also remember when Colt was the pledge master. I do not think that Taylor
39 did anything beyond what Colt did. In fact, I talked with Colt at the funeral. Colt said he
40 thought this was a tragic accident and could not believe there were criminal charges.
41 Colt had used the Water Jeopardy game as a part of the Pledge Olympics as well as
42 both Alex and Taylor. Someone did pass out during Colt's term as pledge master. I do
43 not remember during what activity, but that was probably just from the stress of Pledge
44 Week, or from the heat of South Carolina. Colt was deployed to Afghanistan shortly
45 after the funeral.

46

47 5. I was not around when Jessica died, but I had been in the basement to watch
48 the festivities. It is always funny to laugh at the pledges who take everything so
49 seriously, especially with Water Jeopardy. While I was there, Jessica was being a clown
50 and had to drink more water than the rest. Before I wandered out to go watch some of
51 the fall football practice, I heard Tammy Canes tell Jessica to stop playing. Taylor
52 laughed it off and asked Jessica if she wanted to continue, and she said she did. That
53 was when I wandered out.

1 6. I talked to Taylor and others the next day about the Water Jeopardy.
2 Everyone said it was the usual stuff being played during the game. Nothing that I heard
3 was out of the ordinary in the games that were played by ESE. I am sure there was
4 some teasing when Tammy decided to stop playing the game, but it did not kill her, and
5 she still had the opportunity to become a full member of ESE. I think Taylor was equally
6 hard on all the pledges, not anyone in particular. If Jessica could see that other people
7 were quitting with no negative consequences, then there was no reason she could not
8 have quit too -- especially if she was not feeling well. Taylor told me Tammy was saying
9 she heard drinking too much water could be bad, but she never told anyone there why it
10 was bad or how it was bad. I think like everyone else who was present; Tammy was
11 probably just trying to find a way to get out of the game without looking like she was a
12 wimp. I later asked Tammy what she meant by "bad," and she told me that people could
13 die from drinking too much water.

14
15 7. Between other people not doing the activities and still becoming members, the
16 medical waivers, and the papers that tell you that you do not have to participate, how
17 can you really believe what Taylor did was wrong? Jessica could have quit at any time,
18 but she always was a little irresponsible about her safety. When she was still in high
19 school and visited Colt on campus, she would try to attend parties where alcohol was
20 being served. Alex will do anything to stay out of trouble and blame others for what was
21 a weird accident. I think Alex is trying to throw Taylor under the bus with this whole
22 hazing business. All Alex cares about is staying out of trouble and getting rich after
23 graduation. I think Alex would do or say anything to keep a clean record and an
24 impressive resume. In fact, when the police golf cart was stolen, Alex told the other ESE
25 members that if the cart was anywhere on ESE property, that it had better be moved to
26 another Greek house, or s/he was going straight to the police.

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,

Carson Baker

Carson Baker

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