

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 CHRIS KNIGHT
)	

COMES NOW THE AFFIANT SWORN AND STATES THE FOLLOWING:

1 1. My name is Chris Knight. I am currently a Sergeant with the Daniel Morgan
2 University (DMU) Police Department. I attended Daniel Morgan University for a year
3 before transferring to Clemson University for my undergraduate degree in Military
4 Studies. I have been in law enforcement for 13 years. I have Basic and Advanced
5 School Resource Officer (SRO) certifications, Active Shooter Crisis Response training,
6 Basic and Advanced Narcotics Interdiction training, Basic Instructor Development (BID),
7 as well as Detective School training from the South Carolina Criminal Justice Academy.
8 I was formerly an investigator with the Glendon University Police Department before
9 coming to work with the Daniel Morgan University Police Department.

10

11 2. At approximately 17:08 on August 29, 2009, the Emergency Communications
12 Division dispatched a call of an unconscious person located at 313 Senate Street, Tega
13 Cay. I arrived on the scene at 17:27. The York County Emergency Medical Service
14 (EMS) was already on scene and inside the location. Upon entry to the residence
15 I spoke briefly with EMS personnel, who were loading an unresponsive female onto the
16 stretcher for transport. There were seven people in the room in addition to the victim,
17 EMS, and myself.

18

19 3. The first person I spoke with identified him/herself as Alex Richards, president
20 of the honors society. Richards stated that s/he had been in the upstairs portion of the
21 Epsilon Sigma Epsilon (ESE) house when a pledge came upstairs yelling to call 911 and
22 that Jessica Bateson had collapsed during one of the pledge activities. Richards called

23 911 immediately, and then went downstairs to see what happened. While downstairs,
24 Taylor Durden told Richards that Ms. Bateson had simply “fallen out” during the last
25 phase of the Water Jeopardy game. This game served as the final activity of the
26 initiation week for the society. I am somewhat familiar with the pledge activities of ESE,
27 having been a pledge my second semester at DMU, before transferring to Clemson.
28 I was not fully accepted into ESE as a member. I was told by the then-president of ESE
29 that another member accused me of cheating on finals. As a result, I transferred to
30 Clemson, and was accepted into an honors society there.

31

32 4. Immediately following my interview with Richards, I interviewed Taylor
33 Durden. Durden indicated that s/he was the pledge master for the Epsilon Sigma
34 Epsilon honors society, and that they were completing the last activity in pledge week
35 before full membership was to be granted. Durden then said that Ms. Bateson fell out.
36 I asked what was meant by this and Durden said that she had to drink some more water
37 after getting a question wrong. After drinking more water, she then fell down and it
38 looked like she passed out. I specifically asked if this was a voluntary activity and
39 Durden responded that it was. My initial thoughts and concerns on scene were that
40 perhaps this was an alcohol overdose related to hazing. I asked if alcohol was involved.
41 Durden responded absolutely not, and that I was free to search the ESE house. Chapter
42 President Richards also confirmed the consent to search. Along with an additional
43 officer, I conducted a search of the ESE house and found a small quantity of tequila
44 (less than 500mL) in the room of an ESE member who was above 21. There was no
45 other alcohol found on premises, and it did not appear that the tequila was involved with
46 the activities in the basement.

47

48 5. In speaking with Tammy Canes, she stated that they had all been playing a
49 game in which wrong answers meant that one had to consume large amounts of water
50 as punishment. Canes additionally stated that she quit the game as she recalled from
51 nursing classes that too much water was harmful.

52

53 6. Correct contact information for all witnesses interviewed was recorded for
54 possible follow up. With no other indications of criminal activity at the time, I cleared the
55 incident location and went to the hospital to ascertain Ms. Bateson’s condition. Upon
56 arrival at the hospital, one of the ER physicians stated that Ms. Bateson never regained

57 consciousness and died after her arrival in the ER. I asked if there were any visible
58 signs of foul play. The physician stated that there was no overt trauma indicative of foul
59 play, but pursuant to state law, there would be an autopsy. Seeing no criminal conduct
60 at the time, I contacted the student life coordinator at the University. Along with a
61 representative of the school, we made contact with the sheriff's office in Ms. Bateson's
62 home county, who handled the parental notification of her death.

63

64 7. At the time, I did not realize that Jessica Bateson was the younger sister of
65 Colt Bateson. I have had numerous law enforcement contacts with Colt Bateson. He
66 was known on campus as a reckless and uncaring individual, with concern only for his
67 immediate gratification. He was investigated for several obnoxious campus pranks,
68 which, in my opinion, rose to the level of criminal conduct, though he was never charged.
69 One of these alleged events was the theft of a University Police golf cart, along with a
70 statue of the University mascot.

71

72 8. The autopsy was performed by a medical examiner working under the
73 authority of the Office of the Coroner for York County. At the autopsy, the cause of
74 death was noted as brain stem swelling brought on by a case of acute hyponatremia.
75 Additionally, the medical examiner noted that this was not a natural cause based upon
76 the volume of water in the victim's system. The medical examiner was of the opinion
77 that ingestion of this much water was not normal. An individual's sense of thirst would
78 not allow for the voluntary consumption of so much water, and thus it was a deliberate
79 and forced act. The ruling of the Coroner's office was that Jessica Bateson's death was
80 a homicide.

81

82 9. Upon reviewing the case file following the autopsy report, I spoke by phone
83 with sophomore Tammy Canes, who had been present and questioned on August 29,
84 2009. She stated that she and Jessica pledged ESE together and that Jessica was
85 desperate to fit in and be liked. They had been roommates during freshman year, and
86 Tammy stated that Jessica pledged both semesters without receiving an invite from any
87 of the sororities. Tammy indicated that she thought Jessica would have been
88 heartbroken to have been rejected from ESE, and was doing everything that was asked
89 of her, no matter how ridiculous. Tammy said she quit the Water Jeopardy activity

90 because she thought it was unsafe and she even told Pledge Master Taylor Durden that
91 she thought it could hurt the other pledges.

92

93 10. During further subsequent investigation, the room in which Ms. Bateson died
94 was reexamined. Photographs of the room were taken, including a photo of eight water
95 coolers lined up against one wall of the basement. There were varying amounts of water
96 in each of the coolers, and signs above the coolers used by pledges. Because the
97 scene was not secured immediately following Ms. Bateson's death, it is not known if the
98 water coolers were used after the incident in question on August 29, 2009. The cooler
99 marked with the name Jessica did appear to have significantly less water remaining than
100 the other coolers.

101

102 11. Based upon the findings of the Coroner's Office, information from other
103 pledges, and that Durden was responsible for the pledge activity known as Water
104 Jeopardy; Durden was arrested and charged with manslaughter and hazing. Chapter
105 President Alex Richards was also initially arrested and charged. Richards agreed to
106 testify and all criminal charges made were dropped in exchange for Richards' testimony.

107

108 12. After Durden was arrested, I scheduled an appointment to meet with Tammy
109 Canes on September 19, 2009. Unfortunately, Ms. Canes died in a car accident on
110 September 12, 2009. The cause of the accident is still under investigation, and an
111 investigator with the Highway Patrol is handling the suspicious circumstances of the
112 accident. The investigator told me that though the findings are still pending, it appears
113 that the braking system of Ms. Canes' car was disabled. As an investigator, I find it
114 interesting that Ms. Canes was in a fatal accident only two days after Durden was
115 released on bail.

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,

Chris Knight

Chris Knight

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