

1 **AFFIDAVIT OF MORGAN PEARCE**

2 STATE OF OREGON)
3 County of Duniway) ss.

4 Morgan Pearce, first duly sworn, under oath, states as follows:

5 1. I am 18 years old and live in Chinook, Oregon, with my parents. I am a freshman at
6 Glendale Community College where I am a member of the track team. I graduated from Eastside
7 High School, where I also was on the track team.

8 2. I have been running track since my freshman year at Eastside. I was first introduced to
9 track in my physical education class. My P.E. teacher was Coach Swift, the track coach. Coach
10 suggested that I try out for the team because I was the fastest person in my class. Coach also told
11 me that I might qualify to get a scholarship to cover some, if not all, of the tuition for attending
12 Eastside.

13 3. On the first day of tryouts, Coach told us about the school's drug policy. Coach said that
14 drugs were strictly prohibited. If we were caught with marijuana, cocaine, heroin,
15 methamphetamine or any other narcotic, we would be kicked off the team and the police would
16 be called. Then Coach gave us some OIA form to sign saying we wouldn't use drugs. We went
17 through the same process every year. Coach never said anything about steroids.

18 4. I never saw any posters or any other material about steroids in the locker room.

19 5. I first met Jordan Simon during tryouts. Jordan also was a freshman and had been
20 running track for several years. Both of us ran the 100 meters. Jordan and I hit it off, because
21 Jordan was pretty nice and had a funny way about him/her. After tryouts, we both made the team.
22 I was extremely happy, and so were my parents, because to top it all off I got a scholarship
23 covering 50% of my tuition. Jordan and I started hanging out a lot. Not just at practice, but
24 outside too. We were pretty close, despite the fact that Jordan was always a little faster than I was
25 and usually edged me out at track meets.

26 6. Our first two years were pretty normal for track runners I guess. During the season we
27 would pull two-a-days--working out and lifting weights in the morning before class, and running
28 at track practice after school. We usually would meet at my locker right after our last class and

1 head out to the field together.

2 7. Our junior year Jordan changed a little. Jordan was really busy at home making dinner,
3 doing the cleaning and laundry, and picking up groceries. I think all the extra work was a little
4 much and wore Jordan out. Jordan started to skip morning workouts with me. Jordan's running
5 suffered. I kept up my workouts, and my times kept improving. Not Jordan. Jordan's times
6 started to dip towards the end of the season. We were pretty much tied by the final meet of the
7 season.

8 8. Coach noticed Jordan was slacking too, and was not happy. It wasn't just Jordan's track
9 performance--it was Jordan's school performance as well. Coach started riding Jordan pretty
10 hard. It got worse at the end of that year. One of the seniors received a full-ride scholarship to
11 ASU. It's not that this was unusual or anything, I mean, Eastside almost always finishes in the
12 top five in state, and every year it seems like someone gets a scholarship. That scholarship came
13 at a bad time for Jordan. Like I said, Coach already was riding Jordan pretty hard, and we found
14 out about the scholarship just as Jordan's times hit their lowest of the year. Coach pretty much
15 blew a gasket. I remember one day in the locker room I heard yelling coming from Coach's
16 office. I looked in the window and could see Coach standing over Jordan screaming and yelling.
17 I heard Coach tell Jordan "forget about a college scholarship, if you don't straighten up, I am
18 going to yank your Eastside scholarship!" Right then, Coach looked up and saw me through the
19 window. Coach pointed at me and hollered, "I hope you heard that, because the same goes for
20 you!" Then Coach slammed the door and went back to yelling at Jordan.

21 9. A week later Coach saw Jordan and me in the hall and told us to be at the end of the year
22 banquet early so we could talk. We did, and Coach pulled us into a side room one at a time. I
23 went first. Coach asked if I thought I could get my numbers up so that I could get a scholarship.
24 I said I was working really hard, and I thought it was possible. Coach then told me "getting a
25 scholarship for track takes more than just workouts and practice. It's about what you put into
26 your body too." I told Coach I knew that, and that I was on a good diet. "Diet, yeah, that's
27 important too," Coach said. Then Coach said: "You know only the best of the best get
28 scholarships, right? You have to do whatever it takes." "Yes," I responded. Coach then told me

1 that some of my competitors no doubt were using “supplements” and that, whether I liked it or
2 not, they were the ones who were going to get the scholarships. Coach asked me what I thought
3 about that. I said I didn’t think it was fair. Then Coach said, “It’s not fair, and I certainly won’t
4 give you anything, but one year is a pretty small price to pay for a scholarship that could have
5 lifelong benefits.” With that, Coach told me to send Jordan in.

6 10. About ten minutes later, Jordan sat next to me at the table. I asked about the meeting
7 with Coach. Jordan wouldn’t look at me, but said “one year is a pretty small price to pay for a
8 scholarship. Coach is right.”

9 11. The summer after our junior year Jordan and I didn’t hang out that much. I had gotten a
10 summer job to try and start saving for college just in case, and Jordan still was pretty busy at
11 home.

12 12. When our senior year started, things began to change. Don’t get me wrong, we were
13 still pretty close, it’s just that Jordan started acting funny. Most of the time Jordan just wanted to
14 focus on track. We didn’t meet at my locker after class anymore. Jordan went home instead and
15 met me on the field. It seemed like Jordan didn’t want to hang out; Jordan just wanted to work
16 out. After practice it was the same thing. Jordan would just go straight home, without even
17 showering. At the time, I just figured Jordan was embarrassed. Jordan had started to get some
18 pretty bad body acne.

19 13. Jordan started getting sick a lot too. It started with the nosebleeds. It seemed like once
20 a week Jordan would have to duck out of one of the classes we had together to see the school
21 nurse. Then Jordan started missing school. It happened a lot. When I asked about it, Jordan just
22 told me it was the flu or a bad cold. I figured it was just stress from trying to get a scholarship
23 and from the pressure Coach put on Jordan every practice.

24 14. I was amazed when track season finally started in February 2008. Despite being sick all
25 the time and missing school and practice, Jordan’s numbers were up. I mean way up. Usually, it
26 takes a little time to get back into the swing of things. Not for Jordan. Right from the start,
27 Jordan’s numbers were tenths of a second ahead of the previous year --and that is a lot for the 100
28 meters.

1 15. Coach kept a chart of our best times on a bulletin board in the locker room. It showed
2 our time at the final meet of the year for every year we had been on the team, and our current best
3 time. Everyone saw how much Jordan had improved. A lot of the other runners started talking.

4 16. Right away, I knew something wasn't right. Jordan idolized Coach. Jordan always had
5 talked about what a great track career Coach had before becoming a teacher. Jordan wanted to be
6 just like Coach. And that's when I remembered our talk with Coach before the banquet. I know
7 that Jordan would do whatever Coach said. I quickly put two and two together, and that's when I
8 realized Jordan was using steroids.

9 17. I didn't know what to do, so I decided that I would try and tell Coach. I knew I was
10 risking my scholarship to Eastside, but I had saved up some money from my summer job. I had
11 to risk it. Jordan was my friend. Jordan was in trouble. So I went and told Coach. Coach asked
12 if I had seen Jordan use steroids; if I had seen the steroids; if I had asked Jordan. Of course, I said
13 no. Coach said: "Then my hands are tied. Besides, whatever you are worried about can't be that
14 bad, just look at Jordan's times." That must have been toward the end of April, maybe the
15 beginning of May.

16 18. A few days later, on May 6, 2008, I went to school like any other day. I didn't see
17 Jordan at school that day. I figured Jordan was sick again, but I thought it was odd, because we
18 had a track meet that afternoon and Jordan never missed school on the day of a meet. Toward the
19 end of the day, there was a page over the intercom in my classroom. I was asked to go to the
20 front office. When I got there, there was a bunch of people huddled around talking quietly. One
21 of them, a school counselor, came over and put his arm around me and took me to his office. I
22 started getting worried. I asked what was wrong. He said he would tell me in just a moment. I
23 walked into his office. My heart started beating harder. I sat down. He closed the door. He sat
24 down next to me. He wouldn't look at me. I was starting to panic. "What's going on?", I asked.
25 He told me that Jordan died. I thought I heard him wrong. It felt like the wind had been knocked
26 out of me. He said it happened sometime in the middle of the night. I don't remember what else
27 he said.

28 19. A little while later my mom came to pick me up. When I left the office, I saw Coach in

1 the front office. Coach was sitting alone, crying. As I left with my mom, I remember turning and
2 saying, "I hope you're happy. You killed my best friend."

3 20. I quit the team the next day. I know Coach was put on administrative leave, but I
4 couldn't go back to that locker room. I couldn't be on that field. I couldn't be where my Coach
5 slowly killed my best friend.

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/s/ Morgan Pearce

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SUBSCRIBED AND SWORN to before me, a Notary Public, on January 3, 2008, by
9 Morgan Pearce.

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/s/ Jearl Stanton

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My Commission Expires:

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November 5, 2010

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