

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO
 Civil Action No. 2009cv00309 -mSk-1kmT
 SUZANNE SHELL
 Plaintiff
 v.
 AFRA, *et al*
 Defendants

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GRADE D
 UNITED STATES DISTRICT COURT
 DENVER, COLORADO

APR 21 2009
 GREGORY C. LANGHAM
 CLERK

**AFFIDAVIT of Defendant Jackson, attached to Motion to Dismiss Due to
 Lack of Personal Jurisdiction, and, Motion to Quash Service of Process**

I, Susan Adams Jackson, of 40 Orlando Avenue, Winthrop, Massachusetts, declare as follows:

1. I have lived in Massachusetts for the past thirty-three years.
2. I neither live nor work in the state of Colorado, nor do I conduct business or own property in the state of Colorado.
3. I have not solicited business from any person or entity in the state of Colorado.
4. I have not stepped foot in, nor traveled on the roads of, the state of Colorado for over fifteen years, long before I had cause to know of the Plaintiff.
5. Prior to Plaintiff's claim, I did not request protection from the state of Colorado, nor was I reliant upon the state of Colorado or its amenities in any way within statute of limitations as pertains to Plaintiff's claim.
6. I did not sign the waiver of jurisdiction requested by the Plaintiff.
7. I have signed no contract or agreement or stipulation with the Plaintiff.

8. Prior to Plaintiff's claim, I conducted no affairs relative to the Plaintiff's claim with residents known by me to reside in the state of Colorado.

9. I have not broken a law in the state of Colorado, nor committed an intentional tortious act aimed at, or relative to, the state of Colorado.

10. My only recalled contacts with Plaintiff, previous to this claim, included the following:

- a. Around the year 2000, I offered my efforts as an unpaid transcriber through Plaintiff's website, and got no response;
- b. Around the year 2004, Plaintiff joined a local support group that I was moderating, and made threats and insults to the members, whereupon I "banned" the Plaintiff from the group;
- c. Between the years 2005 and 2008, I received two demand notices from the Plaintiff, claiming copyright infringement, one via letter and one via email, and I responded to the emailed demand essentially that I had nothing of consequence to offer or derail the Plaintiff.

11. I have found no use for Plaintiff's Colorado-based web domains, am not active on or browsing her public Internet groups which the Plaintiff runs from Colorado, nor have I ever seen a copy of Plaintiff's Colorado-printed book.

This I write to the best of my knowledge and recollection, under penalties of perjury.

Respectfully submitted,



Date: April 17, 2009

Certificate of Service

I hereby certify that on the 17th day of April, 2009, I served a true and correct copy of this Affidavit attached to Motion to Dismiss Due to Lack of Personal Jurisdiction, and, Motion to Quash Service of Process, upon the Plaintiff and upon each of the Defendants named as follows:

Suzanne Shell [Plaintiff]
14053 Eastonville Road
Elbert, Colorado 80106

via: USPS, with delivery confirmation.

And on the following Defendants:

William O. Tower	American Family Rights Association
Ann Tower	Families at Risk Defense Alliance
Leonard Henderson	Illinois Family Advocacy Coalition
Dorothy Baez-Kernaghan	Georgia Family Rights, Inc.
Cletus Kiefer	National Association of Family Advocates
Francine Renee Cygan	Connecticut DCF Watch
Mark Cygan	Wiseman Studios
Dennis Hinger	CPS Watch, Inc.
Aimee Dutkiewicz	
Thomas Dutkiewicz	
William Wiseman	
Ann Durand	
Brenda Swallow	
Kathy Tilley	
Dee Contreras	
Randall Blair	

Susan Adams Jackson

_____ Date: _____

Witness

Deane M Benoit
Exp 5-15-09

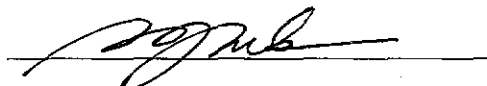
Lloyd Phillips

Ringo Kamens

Cheryl Barnes

Desere' Clabo

via: fax, email, or other mutually agreed upon electronic means.



Susan Adams Jackson

Defendant

Dated: April 17, 2009

Debra M Benoit
Exp 5-15-09