

1 **McNAMARA, GOLDSMITH, JACKSON & MACDONALD**
2 **A Professional Corporation**
3 **1670 E. River Road, Suite 200**
4 **Tucson, Arizona 85718**
5 **(520) 624-0126**
6 **(520) 624-9238 - FAX**

7 **Bruce G. Macdonald**
8 **P.C.C. No. 37276/State Bar No. 010355**
9 **Attorneys for Plaintiffs**

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF ARIZONA**

12 **SAVANA REDDING, a minor, by her mother**)
13 **and legal guardian, APRIL REDDING,**)

NO. CIV 04-265-TUC-NFF

14 **Plaintiffs,**)

15 **v.**)

16 **SAFFORD UNIFIED SCHOOL DISTRICT #1;**)
17 **KERRY WILSON and JANE DOE WILSON,**)
18 **husband and wife; HELEN ROMERO and JOHN**)
19 **DOE ROMERO, wife and husband; PEGGY**)
20 **SCHWALLIER and JOHN DOE SCHWALLIER,**)
21 **wife and husband;**)

AFFIDAVIT OF SAVANA REDDING

**(Assigned to the Honorable
Nancy F. Fiora)**

22 **Defendants.**)
23)
24)
25)
26)
27)
28)

29 **STATE OF ARIZONA**)
30 **COUNTY OF GRAHAM**) ss.
31)

32 **SAVANA REDDING, being first duly sworn, upon her oath, deposes and states:**

- 33 1. I make this affidavit of my own personal knowledge.
- 34 2. I attended Safford Middle School ("Safford") for a portion of sixth grade, all of seventh
- 35 grade and a portion of eighth grade. I was an honor roll student.
- 36 3. I am not aware of a history of drug abuse at the school nor do I believe that the school has
- 37 a reputation of problems with substance abuse.
- 38

- 1 4. Before this incident, I had never been disciplined while I attended Safford.
- 2 5. On October 8, 2003 while I was in Math class, vice-principal Kerry Wilson came into
- 3 class and told me to collect my books and backpack and follow him to his office.
- 4
- 5 6. Once in his office, Mr. Wilson started discussing the importance of telling the truth. I told
- 6 him I would tell the truth.
- 7 7. While Mr. Wilson was speaking, I noticed my planner on Mr. Wilson's desk. It was open
- 8 and contained objects that were not mine. It contained several knives, a lighter and a
- 9 cigarette, none of which were mine.
- 10
- 11 8. I recognized some of the items as belonging to Marissa Glines, another student at
- 12 Safford.
- 13 9. At Marissa's request I had lent her my planner a couple of days before this incident. She
- 14 said she had some things she wanted to hide from her parents, specifically cigarettes, a
- 15 lighter and some jewelry.
- 16
- 17 10. When asked about the planner I admitted that it was mine, but indicated that none of the
- 18 objects were mine and told Mr. Wilson that I had lent my planner several days earlier to
- 19 Marissa.
- 20
- 21 11. Mr. Wilson then pointed to some pills on his desk. There were four white pills and a blue
- 22 pill. He asked if I had seen these pills before. I said no.
- 23 12. Then Mr. Wilson told me that he had found the pills in Marissa's things and that someone
- 24 had said that I was passing out prescription pills at school.
- 25
- 26 13. I told Mr. Wilson that I had never brought any prescription pills to school and that I had
- 27 never given any pills to any student at Safford.
- 28 14. Mr. Wilson then asked me if I would mind if they searched my stuff.

- 1 15. I knew that they would not find anything, so I agreed to the search. Mr. Wilson then
2 called Mrs. Romero into the office.
- 3
4 16. They searched my backpack and found nothing. Then Mr. Wilson told Mrs. Romero to
5 take me to the nurse's office.
- 6 17. That day I was wearing stretch pants without pockets and a T-shirt without pockets.
- 7 18. I went to the nurse's office. Mrs. Romero asked me to remove my jacket, socks and
8 shoes. The school nurse, Mrs. Schwallier was in the bathroom washing her hands. When
9 the Mrs. Schwalleir came out they told me to remove my pants and shirt.
- 10
11 19. I took off my clothes while they both watched. Mrs. Romero searched the pants and shirt
12 and found nothing.
- 13 20. Then they asked me to pull my bra out and to the side and shake it, exposing my breasts.
14 Then they asked me to pull out my underwear and shake it. They also told me to pull the
15 underwear out at the crotch and shake it, exposing my pelvic area.
- 16
17 21. I was embarrassed and scared, but felt I would be in more trouble if I did not do what
18 they asked. I held my head down so that they could not see that I was about to cry.
- 19 22. Then Mrs. Schwallier told me to put my clothes back on and to accompany Mrs. Romero
20 back to the vice-principal's office.
- 21
22 23. Once back at Mr. Wilson's office, after he was advised that nothing was found in my
23 clothes or my person, I was asked to sit in a chair outside of Mr. Wilson's office for
24 approximately 2 1/2 hours.
- 25 24. While I sat in the chair, several individuals came and went from Mr. Wilson's office,
26 including other students Jordan Romero and Chris Clark, a policeman, the principal Mr.
27 Beeman and Marissa's dad, Mr. Glines.
- 28

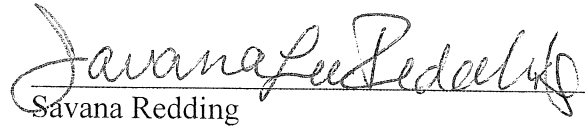
- 1 25. At one point Mr. Beeman came out and told me he had heard that I stashed Marissa's
2 stuff in my backpack.
- 3 26. After the incident, Chris Clark told me that when they searched him, they only asked him
4 to empty his pockets, shake out his shirt and shake his pants up and down. He was not
5 asked to remove any of his clothing.
- 6 27. I was finally allowed to return to class at approximately 12:00 p.m.
- 7 28. The strip search was the most humiliating experience I have ever had. Mrs. Romero and
8 Mrs. Schwallier did not look away while I was taking off my clothes. They did nothing to
9 respect my privacy.
- 10 29. They could have allowed me to remove my clothes in the bathroom stall, or behind a
11 wall, or at least they could have turned their backs to me, but they did not.
- 12 30. I felt offended by the accusations made against me and violated by the strip search.
- 13 31. I was not given the opportunity to call my mother or other relative. After school that day
14 my mother learned what happened. She was very upset and called to make an
15 appointment with the Mr. Beeman.
- 16 32. My mother and I met with Mr. Beeman in his office. Mr. Beeman indicated that he did
17 not think the strip search was a big deal because they did not find anything.
- 18 33. In the course of the meeting, Mr. Beeman raised some events and stories he had heard
19 about me. My mother asked why she had not been called regarding the alleged prior
20 incidents. Mr. Beeman said he could not reach her.
- 21 34. On the night of the dance, I invited several friends over to my home to hang out before
22 the dance. About five of my friends came. I did not provide any alcohol. My mother did
23
24
25
26
27
28

1 not purchase any alcohol at the Thrifty store. The only beverage served at the gathering
2 was soda.

3
4 35. I am a not friend of Jordan Romero. Jordan Romero was not at my house the night of the
5 dance. I did not consume, nor did I have possession of, any alcohol at the dance on
6 August 22, 2003.

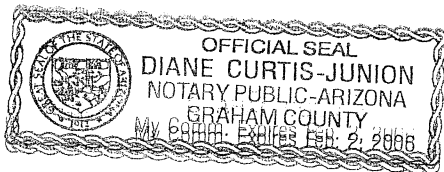
7
8 36. Marissa told me that Jordan Romero gives her his younger brother's Aderall. Jordan and
9 Marissa are part of a group at Safford that get together to smoke, take pills and steal from
10 nearby stores. I believe Marissa has been arrested and charged with theft.

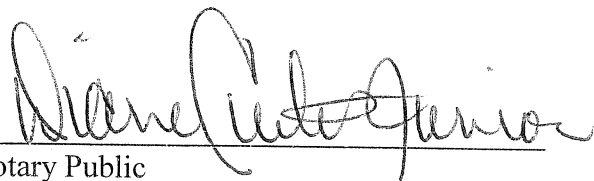
11
12 37. I know nothing about the plan, referred to in Jordan Romero's affidavit that some
13 students were meeting at lunch to take pills on October 8, 2003.

14
15
16 
Savana Redding

17
18
19 SUBSCRIBED, SWORN AND ACKNOWLEDGED before me this 3rd day of

20 November 2004 by Savana Redding.




Notary Public