

DECLARATION OF THELMA PARDUE

I, Thelma Pardue declare as follows:

1. I am the birth mother of Randy . I did not know I was pregnant with my son until four and half months into the pregnancy. Prior to the pregnancy, I would drink every day.
2. During the first four and half months of pregnancy, I would drink as much as two to three pints of **E and J brandy** each day. I was a heavy drinker during the early part of my pregnancy. After I discovered that I was pregnant, I continued to drink as much as one to three bottles of wine a day.
3. During the early stages of my pregnancy while I was drinking, I did not receive any prenatal care. Randy was born after seven months into the pregnancy. He was premature and had problems breast feeding. He was small. He weighed between four to five pounds. He was hospitalized for a week after I gave birth.
4. During the time I was pregnant, I also used illegal drugs including marijuana. I continued to drink up until the time I gave birth to my son.
5. Throughout my son's life entire life he has been made fun of

because he is "slow." He had to repeat the first grade. He was placed in special education classes while in school. He has never been employed.

I declare under the penalty of perjury that the above is true and correct.

Dated:

Sept -15-11


Thelma Pardue



**LAW OFFICES OF THE
LOS ANGELES COUNTY PUBLIC DEFENDER
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Los Angeles, California 90012
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RONALD L. BROWN
PUBLIC DEFENDER

WILLIAM J. EDWARDS
Deputy Public Defender

DECLARATION ON VERA RESHARD

I, Vera Reshard, declare as follows:

1. I am the birth mother of Robert ._____. I was 15 years of age when I became pregnant with Robert.
2. When I was 13 years of age I started drinking alcoholic beverages that included mixing whiskey with ale. I would also drink beer by itself.
3. I never had any prenatal care until about six months along in my pregnancy. I did not know I was pregnant with Robert until I was about four months along.
4. During the first four months of pregnancy, I would drink every other day up to four times a week. I would drink mainly whiskey and mix it with beer. I would sometimes consume up to a 2 pint of whiskey every time I drank alcohol.
5. I would drink until I became intoxicated.
6. I would consume up to four drinks every time I drank alcohol. I also would smoke cigarettes.
7. I would consume alcoholic beverages up to 16 days per month during the first 4 months of pregnancy.
8. Once I found out I was pregnant I continued to drink occasionally during the remaining term of my pregnancy.

I declare under the penalty of perjury that the above is true and correct.

Dated:

Vera Reshard