

NO. 2017-69277

GARELD DUANE ROLLINS, JR.,	§	IN THE DISTRICT COURT OF
	§	
<i>Plaintiff;</i>	§	
	§	
-vs.-	§	HARRIS COUNTY, T E X A S
	§	
H. PAUL PRESSLER, III, <i>ET. AL.</i> ,	§	
	§	
<i>Defendants.</i>	§	127TH JUDICIAL DISTRICT

AFFIDAVIT OF TOBY TWINING

THE STATE OF NEW YORK	§
	§
COUNTY OF <i>New York</i>	§

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared TOBY TWINING, known by me by presentation of his government issued photo identification to be the person whose signature appears below, and who, being by me duly sworn, did depose as follows:

“My name is TOBY TWINING. I am over the age of 18 years, mentally competent, and not otherwise disqualified by law from making an affidavit. I am listed in the above captioned case as a person with knowledge of relevant facts of which I have personal knowledge and they are true and correct. They follow.

“I am fifty-nine (59) years old. I live in New York City with my wife of twenty-one years and our two children, ages nineteen (19) and twelve (12). I hold a B.A. degree in Music from U. Illinois, Urbana (1986) and an M.A. degree from Wesleyan, Connecticut (2006). I have held academic positions at U. Maryland (1995-1997) and N.Y.U. Tisch School of the Arts (1990–1992) and am currently employed as a professional musician in New York City.

“I was raised in a nuclear family in Houston, Texas, the middle son of three boys. Until my seventh grade, we attended Methodist and Presbyterian churches. At age 16, my Christian faith experience grew in a very personal way. Throughout my adult life, I have attended and participated in church regularly. I have held deep respect for faith-based communities and admired their leadership, with exceptions, such as the director of the youth group at the church I attended as a teenager.

“In 1977, at age 18, I attended a Presbyterian church in Houston at which Judge Paul Pressler was director of the youth group. His role in this capacity combined those of a chief administrator, a master of ceremonies, and a pastor. In the latter capacity, he led the group in prayer and, in the manner of evangelical teaching, invited

EXHIBIT "B"

individuals to commit their lives to Christ. At this time, I looked up to Paul Pressler – he was my first youth group director, an eminent state judge and a trustworthy older friend.

“I had started attending the church and its youth group gatherings in the spring of 1975. That year and the following, I went on the annual “Men’s Retreat” held at Pressler’s ranch near Austin. A weekend stay over was the norm. “Men’s Retreat” was something of a misnomer, because young men of high school and college age comprised the majority of participants.

“One weekend at the Pressler Ranch, when I was 16 or 17, Pressler told me there was a shortage of beds and asked if I would mind sharing a bunk with him. I preferred to sleep alone and assumed that Pressler, as the retreat’s host, was politely inconveniencing himself as well. Furthermore, I remember feeling a typical teenage aversion to sleeping beside him. However, out of politeness and wanting to be helpful, I acquiesced. In retrospect, the fact that other men shared the room contributed to my sense that Pressler’s request was not unreasonable.

“One night that weekend, Pressler told me he was cold and then, he unexpectedly rubbed his feet against mine under the covers without asking. It struck me as odd, but it was over as soon as it began so I did not say anything and shrugged it off. However, in retrospect and in light of what follows, I now believe that Pressler had designs on me early in our acquaintance.


“The youth group met regularly on Sunday nights. At the time that I joined, it was already routine for the older boys, men, and Pressler to meet afterward at the River Oaks Country Club. It did not occur to me back then to question the innocence of an established activity that everyone seemed to know about and enjoy. Nonetheless, at the River Oaks Country Club on a Sunday night in August 1977, the day before registration for my sophomore year at the University of Houston, all that changed for me. Until then, outings to the club had been gregarious experiences. We would go to the locker room, take off our clothes, then hit the saunas. After the sauna, we moved to the showers, having great conversation the whole time. The camaraderie of hanging-out with my friends, relaxing, and rejuvenating was a wholesome pleasure.

“The evening those happy experiences ended, Pressler invited me to the club after the youth group’s meeting as usual. Nothing seemed out of the ordinary. Normally, four to twelve of my peers would car-pool to the club. That evening I rode with Pressler (I remember his car was nicer). On the way, I noticed that I was his only passenger and asked him who else was going. Pressler told me that we were the only two. I remember that I felt disappointed and that I suspected nothing.

“On previous occasions, when my peers and I convened in the saunas and showers at the River Oaks Country Club (maybe 9:00/9:30pm), there were usually no other club members around but Pressler. That was the case this time as well. However,

as the usual group from the church was not present, Pressler and I entered the steam sauna alone. I remember being the first to go in and sit down. Pressler followed, but instead of taking a seat, he halted in front of me. At that moment, he reached out suddenly and grabbed my penis, pumped it, then pulled back his hand quickly. I was absolutely not aroused. I froze. Shocked, stunned, and utterly frightened, I had no idea what to expect next. I was naked and trapped – miles from home – and I needed to get to safety. I somehow got out of the sauna, entered the showers and kept beyond Pressler’s reach. My instincts told me to carry on as though nothing had happened – to end the evening with no further incident. With great difficulty I talked calmly, while staying alert. We returned to the locker room and dressed. Then Pressler drove me to my car without further incident. I went home and from that moment on I have stayed away from him.”

AFFIANT SAYS NOTHING FURTHER.



TOBY TWINING, Affiant

SWORN TO AND SUBSCRIBED BY TOBY TWINING this 8th day of March
2018 to certify which witness below my hand and seal of office.

ESTHER MARY BORDEN
NOTARY PUBLIC-STATE OF NEW YORK
No. 01806145534
Qualified in New York County
My Commission Expires May 08, 2018



NOTARY PUBLIC IN AND FOR
THE STATE OF NEW YORK

SEAL:

