

## AFFIDAVIT OF LAURA OWENS

1. My name is Laura Owens. If called to testify in court, I could and would testify to the following under penalty of perjury based on my own personal knowledge.
2. I am 33 years old. My date of birth is [REDACTED]. I am not married and I do not have any children. I am 5'5" tall and currently weigh around 91 pounds.
3. I currently reside in Scottsdale, Arizona with my parents.
4. I am the Petitioner in the matter of *Laura Owens and Clayton Echard*, Maricopa County Superior Court Case No. FC2023-052114.
5. I first met Clayton Echard in May 2023 when I contacted him about purchasing some real estate investment properties. It is my understanding Clayton is a real estate agent, and I contacted him in that capacity via LinkedIn.com to inquire about some properties.
6. In addition to discussing real estate, Clayton and I flirted with each other and I believed that he was interested in me either romantically or physically. The feeling was mutual.
7. On May 20, 2023, after exchanging some flirty text messages, Clayton invited me to come over to his home in Scottsdale, which I did. Shortly after arriving that evening, Clayton offered me a THC (marijuana) edible "gummy", which I accepted. Clayton also took at least one edible, and he appeared fairly "high" at the time.
8. Clayton and I began kissing while seated on his couch. This eventually led to both of us removing all our clothing. I performed oral sex on Clayton, and he finished in my mouth which I later swallowed. During this time, I clearly told Clayton I did not want to have sexual intercourse with him. Despite this, at one point while on the couch, Clayton inserted his penis inside my vagina for a moment. It was clear to me this was not accidental on his part. In response, I pushed him away and removed his penis from my body.
9. Although Clayton's conduct might fit the technical definition of rape or sexual assault, I did not and do not want to accuse him of any crime, nor do I want him to be criminally prosecuted.
10. After the session on the couch ended, Clayton and I went to his bedroom and slept for several hours. During the night, we woke up and became physical again, and I performed oral sex on him again until he climaxed in my mouth. After we were done, I swallowed the semen and then went to the bathroom.

11. I understand Clayton claims I may have tried to “trap” him by “inseminating myself” – spitting his sperm from my mouth into my hand and then inserting the sperm into my vagina. That is not true. I swallowed both times, and I did not do anything to intentionally inseminate myself.

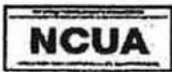

12. If I had wanted to “trap” Clayton, I would have told him I was willing to have sexual intercourse, and it was clear to me he would have accepted that offer. Instead, I told Clayton I did *not* want to have sex because I had no intention of getting pregnant.

13. After the physical activity that took place on the evening of May 20<sup>th</sup>, Clayton and I viewed some properties in Scottsdale a few days later.

14. After viewing several properties with Clayton, I asked him to prepare written purchase offers for two properties; one was located at 19777 North 67<sup>th</sup> Street in Scottsdale (offer amount was \$425,000) and the other was located at 7609 N. Lynn Oaks Drive in Scottsdale (offer amount was \$699,000).

15. As requested, Clayton prepared both offers which I signed on May 24, 2023 and asked him to transmit to the sellers.

16. To demonstrate my offers were serious, I attached proof of funds to the offers which included a current bank statement showing I had almost \$450,000 in cash in my checking account, as shown below.

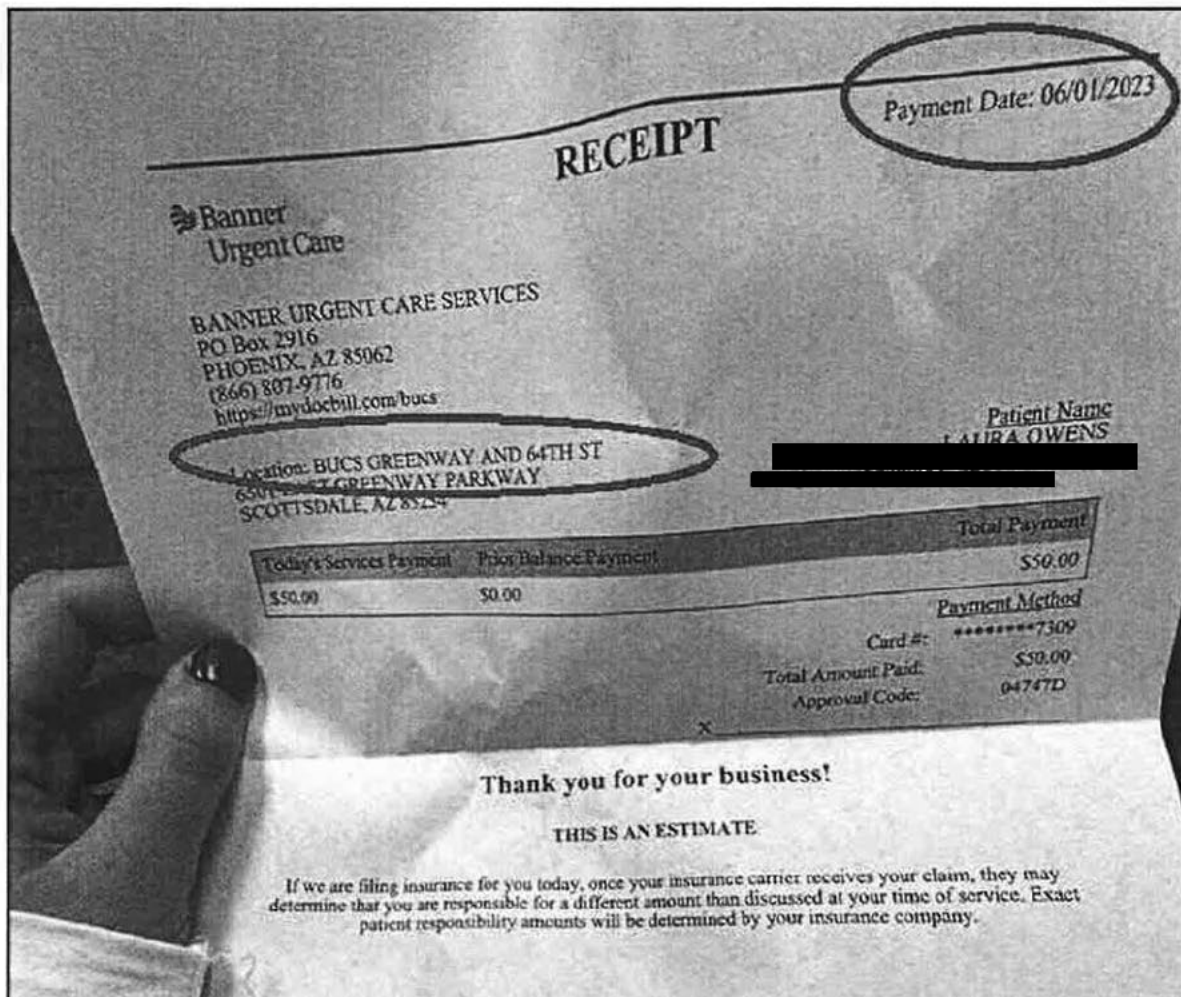
<b>MONEY MARKET CHECKING</b>			
Previous Balance:	\$448,618.25	Dividends Earned in 2023:	\$3,627.42
2 Deposits/Credits:	+ \$1,352.63		
0 Withdrawals/Debits:	- \$0.00		
<b>New Balance:</b>	<b>\$449,970.88</b>		
<u>Transaction Date</u>	<u>Post Date</u>	<u>Transaction Description</u>	<u>Amount</u>
		Previous Balance	\$ 448,618.25
04/15		Deposit by Check	586.59 ✓
05/01		Deposit Dividend Tiered Rate	766.04 ✓
		Annual Percentage Yield Earned (APYE) For Period 04/01 - 04/30: 2.100%	
		Based on an Average Daily Balance of \$ 448,931.10	
05/12		Ending Balance	<b>\$ 449,970.88</b>
<b>Dividend and Interest Summary YTD</b>		<b>Additional names on account:</b>	
Taxable (non-IRA) Dividends Earned:	\$3,652.65	Name:	Relationship:
			Beneficiary
 			
Federally Insured by NCUA			

17. Shortly after the offers were signed, Clayton told me he sent them to the sellers or their agents. Several days later, after I did not receive any updates, I asked Clayton whether he had sent the offers and whether he had heard anything back. Clayton's response was that yes, he had sent the offers, and no he had not heard anything back.

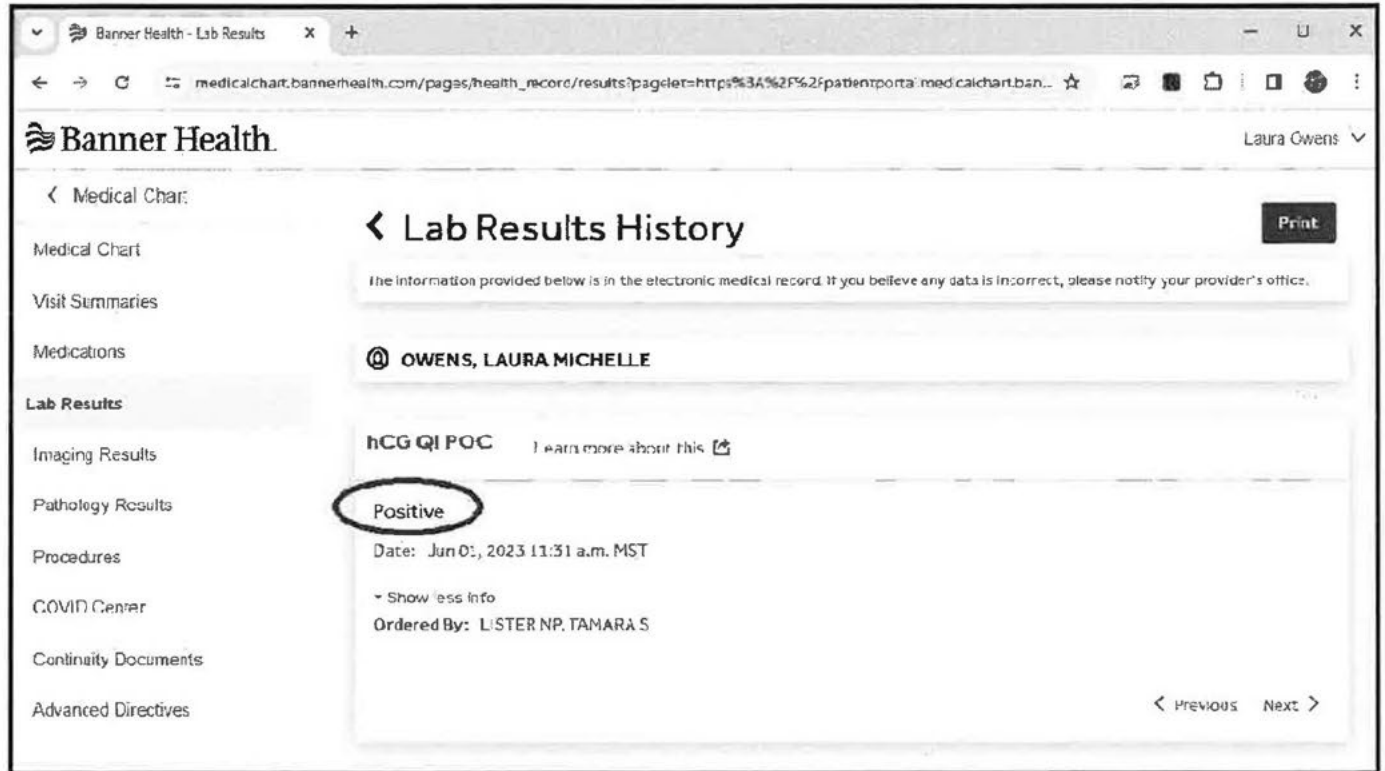
18. I did not know at the time, but later learned, that Clayton lied to me about submitting these offers. He never sent them to the sellers or their agents. As a result, my offers were never considered or accepted by the sellers.

19. On May 31, 2023, I took a home pregnancy test which showed a faint positive result. This caused me to believe I might be pregnant.

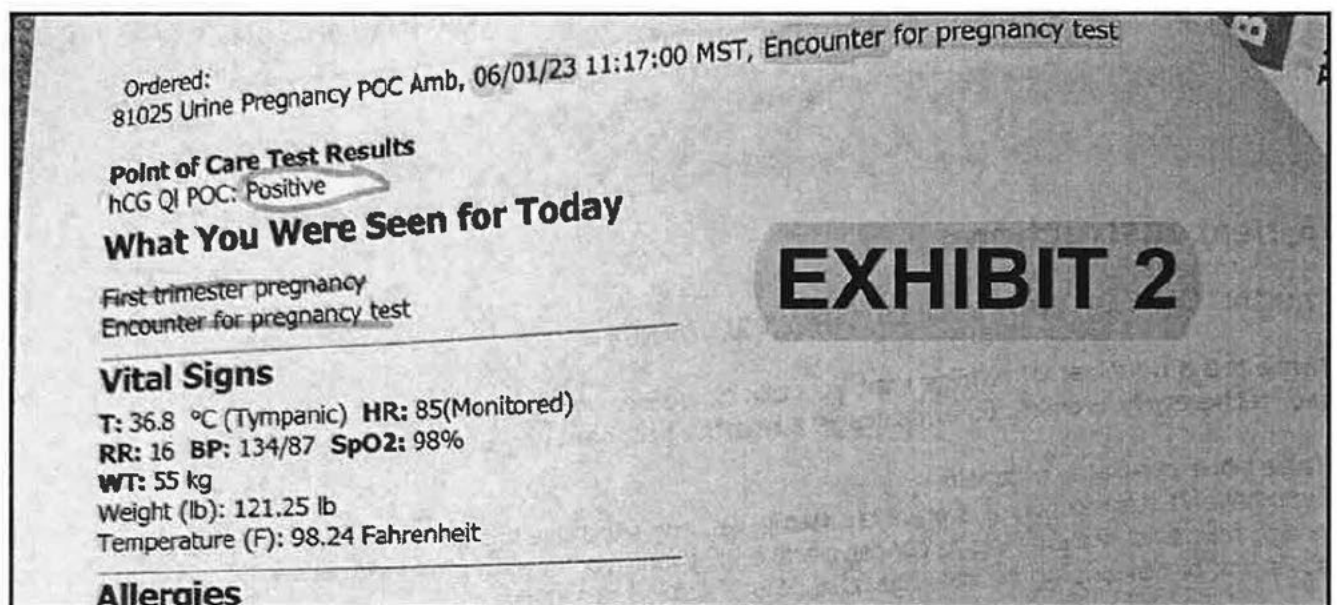
20. To confirm the home test results, on June 1, 2023 I went to my local Banner Urgent Care located at Greenway and 64<sup>th</sup> Street in Scottsdale. Upon arriving at the location, I informed the nurse I thought I might be pregnant based on the faint line on the home pregnancy test I took the day before. I did not ask the nurse for any specific type of test. I simply told her I wanted to know if I was pregnant.



21. The test results I received from Banner were positive for pregnancy. Those results were (and still are) available in my Banner Health patient portal, as shown below.



22. I also received a printout from Banner with the test results, as shown below.



23. After confirming I was pregnant, I contacted Clayton and tried to discuss the situation with him. I was not sexually active with any other men aside from Clayton around the time of conception, so I firmly believed he must be the father.

24. Clayton was very dismissive and angry. He claimed it was “impossible” for me to be pregnant because he claimed we “never had sex” (even though we did, albeit only briefly).

25. Clayton eventually agreed to meet with me on June 19, 2023 at his home. When I arrived around 7:45 PM, I brought the positive pregnancy tests to show Clayton. He still did not believe I was pregnant.

26. Clayton then produced a home pregnancy test he had purchased, and he demanded I take the test in front of him (which meant peeing on a stick). I complied with his request and I took the test directly in front of him, with him watching. I understand Clayton has claimed that I would not allow him to watch me take the test, but that is false – he watched me directly the entire time.

27. The test I took in front of Clayton also showed positive for pregnancy. Despite this Clayton continued to insist that I was not pregnant and that if I was, he was not the father. He later asked me to stop contacting him.

28. On July 2, 2023, while traveling in southern California, I made an appointment with Planned Parenthood for the purpose of obtaining pills to medically terminate the pregnancy. At that time, Clayton had told me that he had no intention of being a father, and that if I decided to carry through with the pregnancy, he would have nothing to do with the child/children. Clayton’s attitude and horrible treatment caused me a great deal of stress and anxiety, and I was very close to making a decision to terminate the pregnancy.

29. My mother drove me to the Planned Parenthood location on July 2, 2023, but she did not come into the facility with me. I went into the appointment alone, and I explained my situation to the care provider. As part of my evaluation, the care provider at Planned Parenthood performed a sonogram on me and verified that I was, in fact, pregnant.

30. I took a photo of the sonogram screen with my phone, but I did not want Clayton to know where I had gone for the appointment. To conceal that information, I modified the image to change the facility name from Planned Parenthood to SMIL (Scottsdale Medical Imaging), and I also changed the date from July 2, 2023 to July 7, 2023. A copy of the modified sonogram image is shown below.





31. Other than changing the top part of the image to alter the facility name and date, I did not change any other part of the image. This image was taken at Planned Parenthood in California on July 2, 2023. I did not find this image online, and I did not take someone else's image and pretend it was mine. I obviously regret doing this, but I made a mistake due to the amount of stress, anxiety and depression I was experiencing.

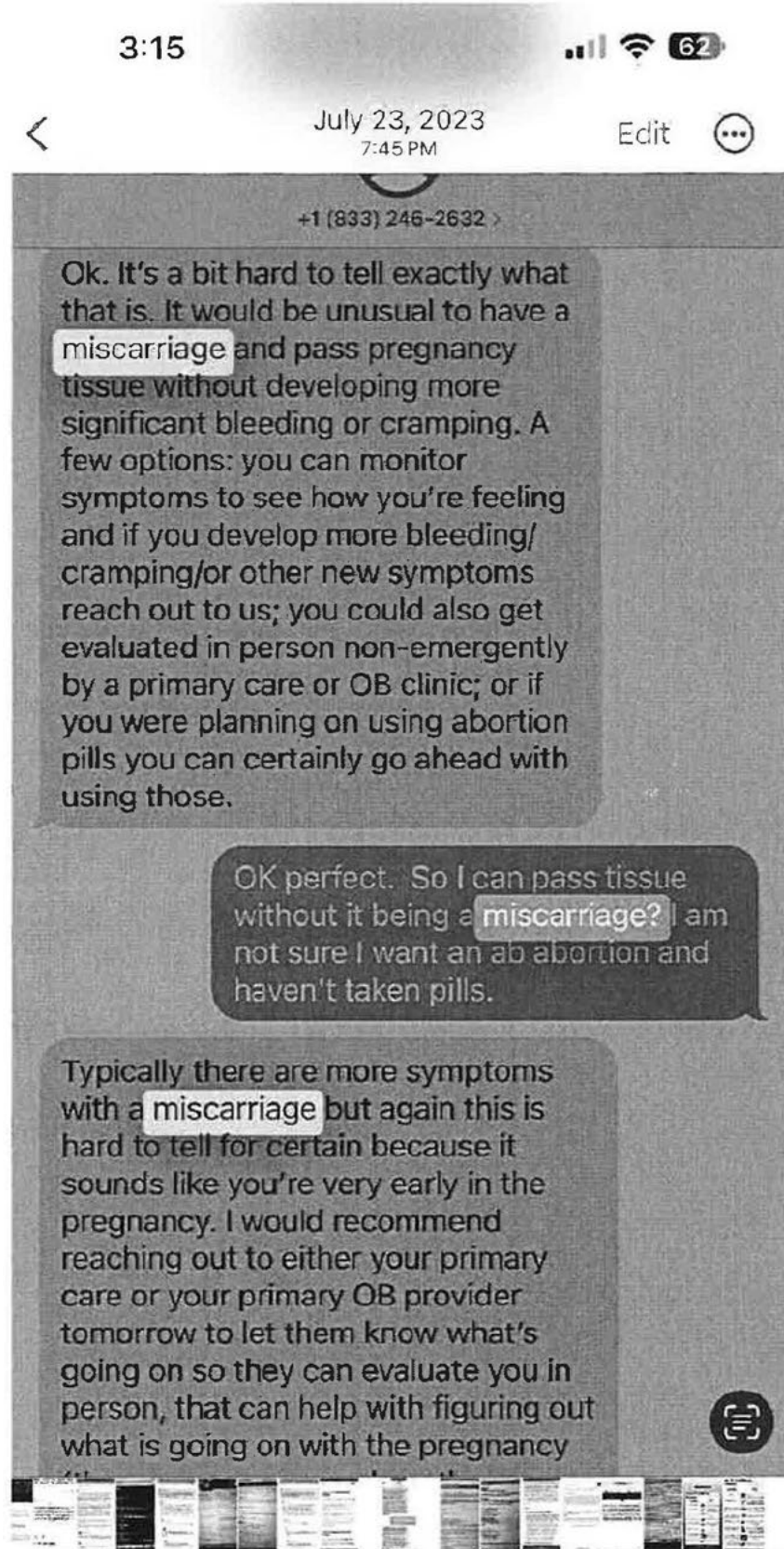
32. Although I had not made a final decision about terminating the pregnancy, I wanted Planned Parenthood to give me the medication so I could take it home with me and have it available in case I made the decision to terminate. However, Planned Parenthood told me patients were not allowed to leave with abortion pills, so if I wanted to abort the pregnancy, I would have to take the pills while present in their office. Because of this, I left Planned Parenthood without any abortion medication.

33. Several weeks later, on July 23, 2023, I experienced some bleeding and I passed what appeared to be two small fleshy objects, as shown in the photos below. These objects were very small, no more than an inch or two. Clayton's lawyer repeatedly asked me (later) whether these objects were the "size of your hand". My response was always: "smaller than my hand"



34. Larger versions of these photos, which I took on July 23, 2023, are attached hereto as Exhibit 2.

35. At this time, I did not know if I had miscarried, so I immediately contacted a telehealth provider for guidance, as shown below.





36. Based on my discussions with the telehealth provider, it was unclear whether I had just miscarried, so I decided to wait several days and see if I had any further symptoms. A few days later (around July 25), I took another at home test which continued to show positive for pregnancy.

37. Over the next week, I felt fine and did not experience any further bleeding or other symptoms. On August 1, 2023, I took another home pregnancy test, and that also showed a positive result.

38. Based on my inability to communicate with Clayton about the pregnancy, I filed a paternity petition in court on August 1, 2023. At the time I filed the petition, I believed I was still pregnant and that Clayton was the father.

39. Between August 1 and early October, 2023, I experienced weight gain, especially in my abdomen as shown in the photos below taken on Sept. 19, 2023 and October 9, 2023.




40. On August 15, 2023, I paid \$725 to a company called Ravgen Diagnostics for a fetal DNA test. Unfortunately, Clayton refused to submit a sample for testing, so I had to cancel the first test with Ravgen.

41. Later, in late September/early October, both Clayton and I submitted samples to Ravgen for testing. I later received a call from Ravgen stating the initial tests were “inconclusive” because there was “little to no fetal DNA found”.

42. As part of my further treatment and evaluation, I had a blood test done on October 16, 2023 which showed an HCG level of 102. It is my understanding that an HCG level this low at this stage of a pregnancy indicates the pregnancy is non-viable.

**Report Status FINAL**  
Route 1006 Ordered by:  
**Any Lab Test Now Scottsdale**  
8989 E Via Linda  
Suite 111  
Scottsdale, AZ 85258

**Judy Hunter, MD**

 **Sonora Quest Laboratories**  
A Subsidiary of Laboratory Sciences of Arizona

Patient information: **OWENS, LAURA**

Order #: **132885018873 / NL93226479**

Account: 13288  
#:  
791

Collected: 10/16/2023  
Received: 10/16/2023 09:02 PM  
Reported: 10/17/2023 12:27 AM

Sex: F  
Age: 33Y-5M-2D  
Patient Phone:

TEST	RESULTS	REFERENCE RANGES	UNITS	PL
<b>CHEMISTRY</b>				
<b>hCG Quantitative</b>	<b>102 H</b>	<b>≤4</b>	<b>mIU/mL</b>	
hCG Reference Ranges: Non-pregnant ovulating female: ≤ 4 mIU/mL Non-pregnant post menopausal female: ≤ 10 mIU/mL Male: ≤ 2 mIU/mL				
This hCG Electrochemiluminescent Immunoassay was performed using Roche Elecsys reagents. This assay is a total beta subunit assay. It measures intact, nicked, free beta, and nicked free beta hCG. Rebaselining may be necessary when using another assay.				

**Tests Ordered: hCG Quantitative**

43. A month later, on November 14, 2023, I had a gynecological visit with a provider at MomDoc. At that time, I was given two separate pregnancy tests, with both showing a negative result. Records from this visit are attached as Exhibit 6.


44. To be clear — Clayton claims I “faked” this pregnancy and I was never pregnant. That is absolutely false. I believe that I was pregnant, and that the pregnancy ended with a miscarriage. I know that I was not sexually active with any men other than Clayton during the period in which conception occurred, so I believe Clayton was the father.

45. I am aware Clayton has claimed I may have taken some sort of drugs or hormones in an attempt to create a false positive on the pregnancy tests I took. Again, that is completely false. I did not take any drugs, hormones, nor did I do anything to manipulate my HCG levels (I do not even know what HCG levels are, other than that they are something medical professionals use to determine if a woman is pregnant).

I, Laura Owens, do hereby swear or affirm under penalty of perjury that I am the Petitioner in the above-styled matter; that I have read the foregoing document and know the contents thereof, and the contents are true of my own knowledge and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

Executed on April 16, 2024

  
Laura Owens

**INDEX OF EXHIBITS**

<b>Exhibit</b>	<b>Description</b>	<b>Date</b>
1	Pregnancy Test at Banner Health	June 1, 2023
2	Images of Tissue Discharged	July 23, 2023
3	Barrow (Zieman) Visit Summary	October 11, 2023
4	Barrow Epilepsy Pregnancy Specialist Appt.	October 17, 2023
5	HCG test – Sonora Quest	October 17, 2023
6	MomDoc Records	November 14, 2023

# EXHIBIT 1



acid please, with folic acid please, 55 kg, 06/01/23 11:25:00 MST, ...  
Encounter for pregnancy test

Ordered:  
81025 Urine Pregnancy POC Amb, 06/01/23 11:17:00 MST, Encounter for pregnancy test

**Point of Care Test Results**  
hCG QI POC: Positive

## What You Were Seen for Today

First trimester pregnancy  
Encounter for pregnancy test

# EXHIBIT 2

### Vital Signs

T: 36.8 °C (Tympanic) HR: 85(Monitored)  
RR: 16 BP: 134/87 SpO2: 98%  
WT: 55 kg  
Weight (lb): 121.25 lb  
Temperature (F): 98.24 Fahrenheit

### Allergies

No known allergies

### Your Care Team

**Attending Physician** - LISTER NP, TAMARA S  
**Primary Care Physician** - ITEMP, DOC

## What Happened Today

Browser: Banner Health - Lab Results  
URL: medicalchart.bannerhealth.com/pages/health\_record/results?pagelet=https%3A%2F%2Fpatientportal.medicalchart.ban...  
Banner Health logo | Laura Owens

Medical Chart > **Lab Results History** Print

The information provided below is in the electronic medical record. If you believe any data is incorrect, please notify your provider's office.

**OWENS, LAURA MICHELLE**

**hCG QI POC** [Learn more about this](#)

**Positive**

Date: Jun 01, 2023 11:31 a.m. MST

▼ Show less info  
Ordered By: LISTER NP, TAMARA S

Navigation: < Previous   Next >

Left sidebar menu:  
Medical Chart  
Visit Summaries  
Medications  
**Lab Results**  
Imaging Results  
Pathology Results  
Procedures  
COVID Center  
Continuity Documents  
Advanced Directives

# EXHIBIT 2







# EXHIBIT 3

OWENS, LAURA MICHELLE Admin Sex: Female DOB: 05/14/1990

**Continuity of Care Document**

Summarization of Episode Note | 10/17/2023 to 10/17/2023

Source: Barrow Epilepsy

Created: 12/30/2023

**Demographics**

Contact Information:

[Redacted Contact Information]

Previous Address(es):

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Marital Status: Unknown

Religion: Not Specified

Race: Multi Racial/Other

**Previous Name(s):**

OWENS, LAURA

Ethnic Group: Not Hispanic or Latino

Language: English

ID: URN:CERNER:IDENTITY-FEDERATION:REALM:99FAC598-D72A-4299-90B8-DD712E6433B2:PRINCIPAL:71A1ED68-7DFA-4721-95D4-BFE523C12738, 9489886, 9489886, 417D83E1-5BF0-4C7D-BE7A-0F5EB36B3FAB

**Care Team**

Type	Name	Represented Organization	Address	Phone
primary care physician	PCP, None per patient	--	--	--

**Relationships**

No Data to Display

**Document Details**

**Source Contact Info**

[Redacted Source Contact Info]

**Author Contact Info**

12/30/2023 3:24 PM

Barrow Epilepsy

**Recipient Contact Info**

--

**Healthcare Professionals**

No Data to Display

**IDs & Code Type Data**

Document Type ID: 2.16.840.1.113883.1.3 : POCD\_HD000040

Document Template ID: 2.16.840.1.113883.10.20.22.1.1 : --, 2.16.840.1.113883.10.20.22.1.1 : 2015-08-01, 2.16.840.1.113883.10.20.22.1.2 : 2015-08-01

Document ID: 2.16.840.1.113883.3.2828.7.43.999362 : 1277906541

Document Type Code: 2.16.840.1.113883.6.1, 34133-9

Document Language Code: en-US

Document Set ID: --

Document Version Number: --

### Primary Encounter

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#### Encounter Information

Registration Date: 10/17/2023

Discharge Date: 10/17/2023

Visit ID: --

#### Location Information

Barrow Epilepsy

(Work): 240 W Thomas Rd Suite 403, Phoenix, AZ 85013-, US

#### Providers

Type	Name	Address	Phone
Attending	Chen, Stephanie C FNP	(Work): 240 W Thomas Rd Suite 403, Phoenix, AZ 85013-, US	Tel: (602)406-6262 (Work)

## Encounter

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AZSACLIN\_FIN 51655557 Date(s): 10/17/23 - 10/17/23

Barrow Epilepsy 240 W Thomas Rd Suite 403 Phoenix, AZ 85013- US (602) 406-6262

### Encounter Diagnosis

Epilepsy (Discharge Diagnosis) - 10/17/23

Pregnant (Discharge Diagnosis) - 10/17/23

Generalized epilepsy (Discharge Diagnosis) - 10/17/23

Traumatic brain injury (Discharge Diagnosis) - 10/17/23

Myoclonic jerking (Discharge Diagnosis) - 10/17/23

Discharge Disposition: Cerner Auto Discharge

Attending Physician: Chen, Stephanie C FNP

Author: Barrow Epilepsy

Last Modified: 10/25/2023 5:45 AM

## Reason for Visit

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FU PREGNANCY;FU PREGNANCY

## Allergies, Adverse Reactions, Alerts

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No Known Medication Allergies

Author: Perez, Evelyn, Barrow Concussion & Brain Injury Center

Last Modified: 02/8/2023 9:58 PM

## Assessment and Plan

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Extracted from:

Title: Office Visit Note: Neurology BNI	Author: Chen, Stephanie C FNP	Date: 10/17/23		
<p>Ms. Laura Owens is a 33 year old female with a history of TBI, epilepsy, depression and ADHD (not currently on ADHD meds during pregnancy) who is here to establish care with Epilepsy Clinic today. She is currently 22 weeks pregnant with twins (boy/girl). We will check a lamotrigine level, no baseline level available for comparison. Based off LTG level, we will adjust her LTG (if needed).</p> <p>Her first seizure was in May 2017. She had 3 seizures in May 2017 which have not recurred since she started lamotrigine. She was told she had generalized epilepsy in 2020 via a routine EEG with a neurologist in San Francisco. We discussed how generalized epilepsies are usually not associated with TBI and that focal epilepsies are usually more associated with TBI. We will repeat a EEG at BNI. Brain MRI in May 2023 was normal.</p> <p>She does have daily body jerks which she calls "myoclonic jerks" and symptoms she calls "vocal tics." These have increased recently.</p> <p>Today we discussed the following regarding pregnancy and epilepsy:</p> <ul style="list-style-type: none"><li>- Continue prenatal vitamin and folic acid 4 mg</li><li>- We recommended breastfeeding</li><li>- She will get monthly AED levels and we will follow-up by phone.</li></ul>		Chen, Stephanie C FNP Barrow Epilepsy	10/17/2023 9:02 PM	

- Call us when she enters hospital to deliver so we can follow AED levels after delivery

Plan:

1. Continue lamotrigine ER 300 mg for now.
2. Check LTG level tomorrow and monthly after then. I will f/u via the portal with any LTG dose adjustments.
3. Routine EEG ordered.
4. Continue PNV and folic acid.

5. AZ driving laws discussed- she is currently driving.

6. RTC in 2-3 mos, before she delivers.

A total time of 62 minutes was spent for this patient's visit. 12 minutes were on the day of the patient's visit reviewing past notes, interval notes, imaging, and labs. 35 minutes were spent with the patient collecting history, consulting, and formulating a care plan. 15 min was spent documenting and coordinating care after the visit.

Informed Consent: The risks, benefits, and alternatives to the virtual/video visit were explained to the patient and the patient consented to this modality of care. The telemedicine visit was performed via real time synchronous video and audio, using Zoom Video Communications, with the originating site at the patient's home and the distant site at Stephanie Chen's office. Verbal consent to participate in video visit was obtained. No technical issues occurred during the call.

I discussed with the patient the nature of our telemedicine visits, that:

- \* I would evaluate the patient and recommend diagnostics and treatments based on my assessment.
- \* Our sessions are not being recorded and that personal health information is protected.
- \* Our team would provide follow up care in person if/when the patient needs it.

Members of care team present at visit include: Stephanie Chen, NP

PATIENT LOCATION: Patient's residence

PROVIDER LOCATION: Provider's office

PATIENT INFORMED OF TREATING MEDICAL GROUP: Yes

VISIT TYPE: SECURED INTERACTIVE REAL TIME VIDEO

DATE OF SERVICE: 10/17/2023