

## 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.

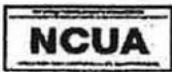
12. If I had wanted to “trap” Clayton, I would have told him I was willing to have sexual intercourse, and it was clear to me he would have accepted that offer. Instead, I told Clayton I did *not* want to have sex because I had no intention of getting pregnant.

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.

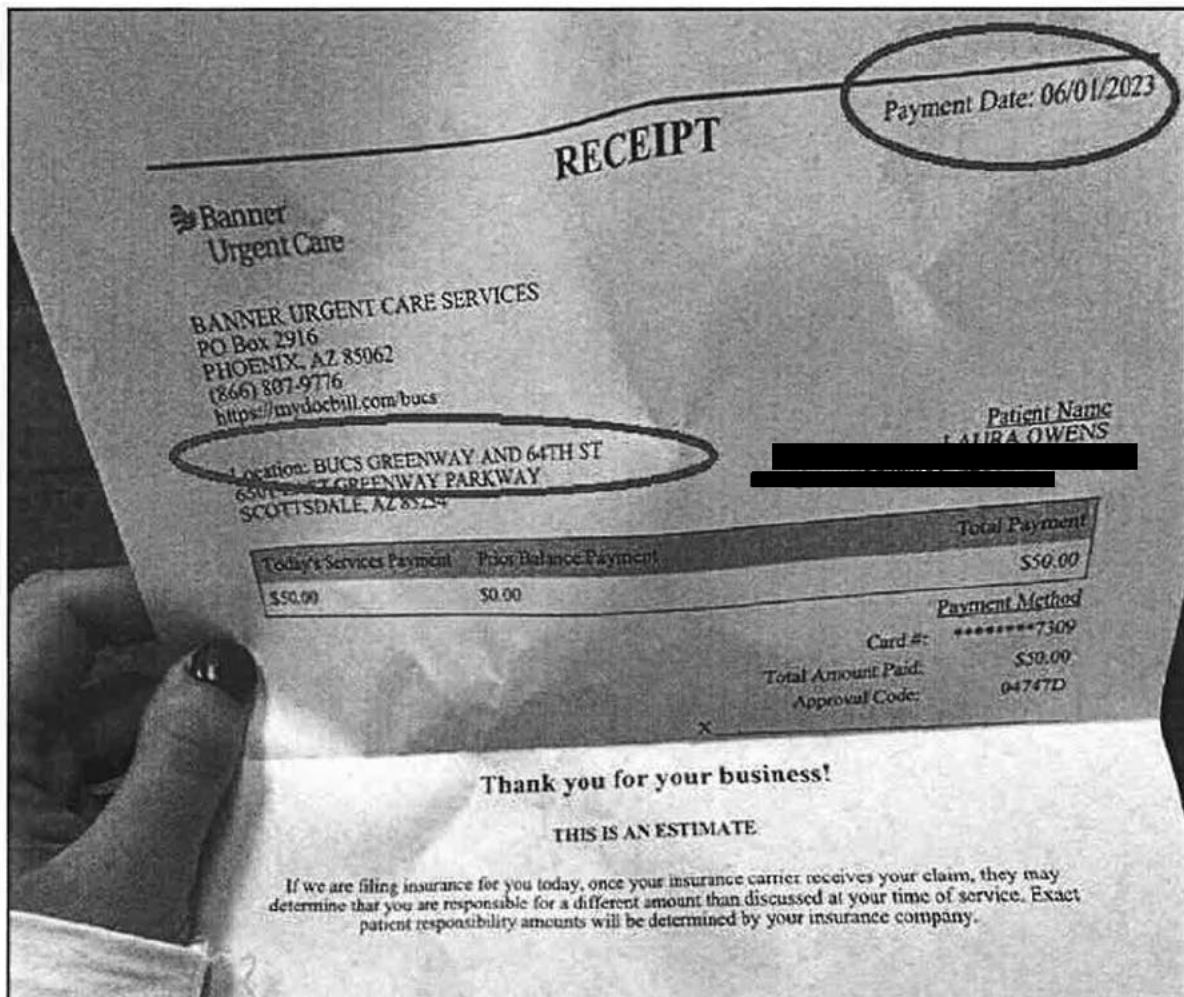
<b>MONEY MARKET CHECKING</b>			
Previous Balance:	\$448,618.25	Dividends Earned in 2023:	\$3,627.42
2 Deposits/Credits:	+ \$1,352.63		
0 Withdrawals/Debits:	- \$0.00		
<b>New Balance:</b>	<b>\$449,970.88</b>		
Transaction Date	Post Date	Transaction Description	Amount
		Previous Balance	\$ 448,618.25
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.

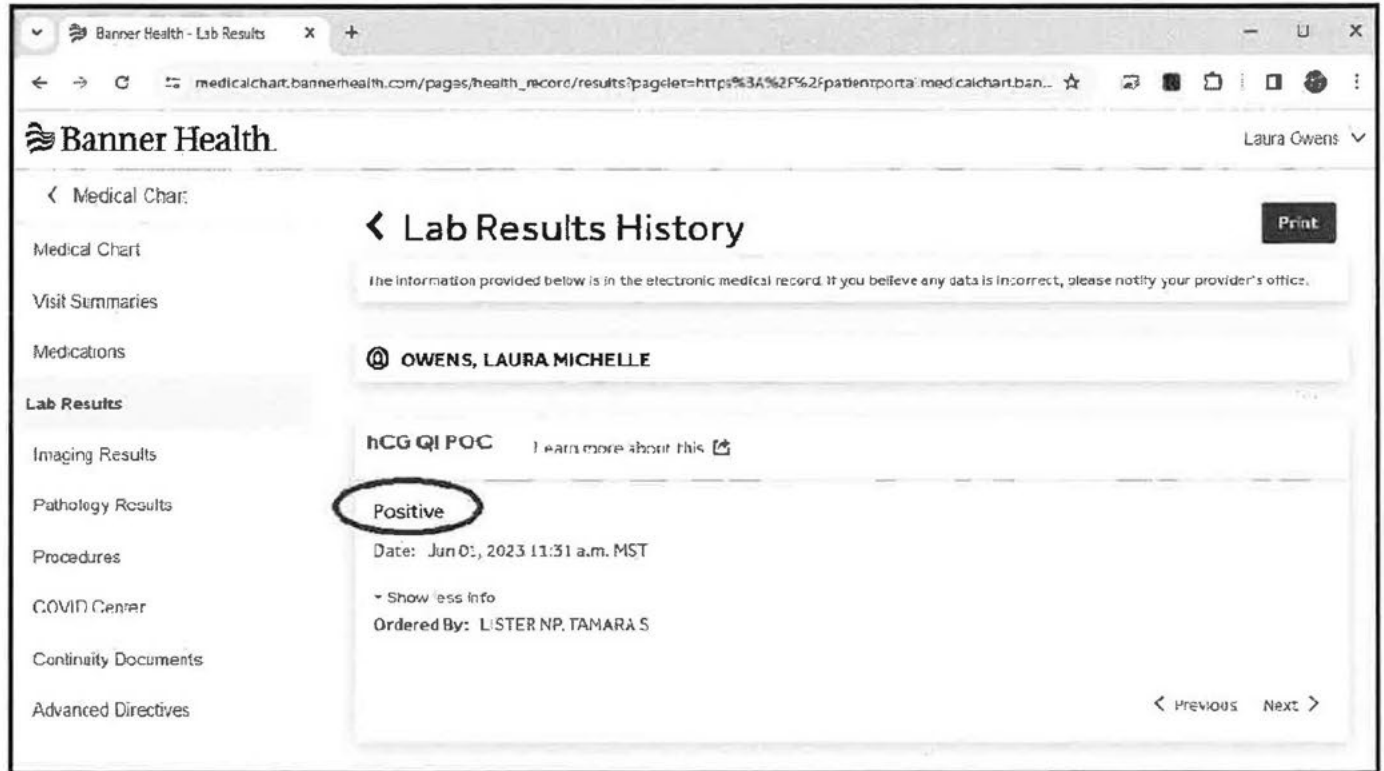
18. I did not know at the time, but later learned, that Clayton lied to me about submitting these offers. He never sent them to the sellers or their agents. As a result, my offers were never considered or accepted by the sellers.

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.

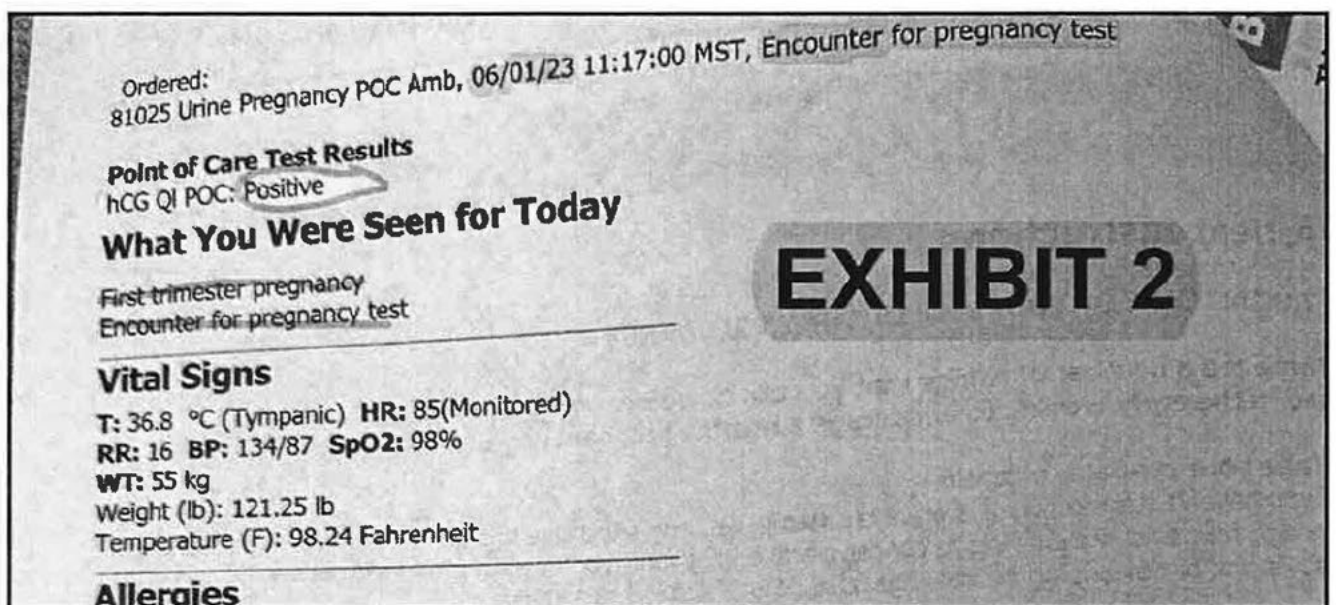
20. To confirm the home test results, on June 1, 2023 I went to my local Banner Urgent Care located at Greenway and 64<sup>th</sup> Street in Scottsdale. Upon arriving at the location, I informed the nurse I thought I might be pregnant based on the faint line on the home pregnancy test I took the day 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.

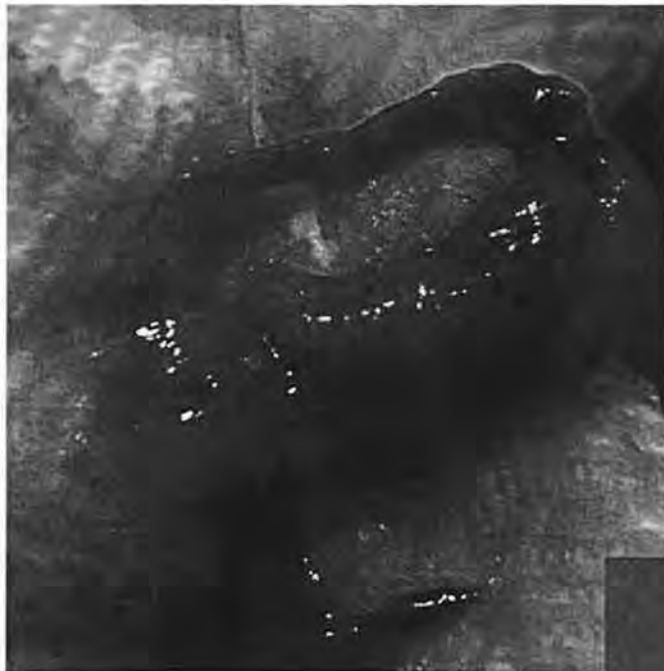




31. Other than changing the top part of the image to alter the facility name and date, I did not change any other part of the image. This image was taken at Planned Parenthood in California on July 2, 2023. I did not find this image online, and I did not take someone else's image and pretend it was mine.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

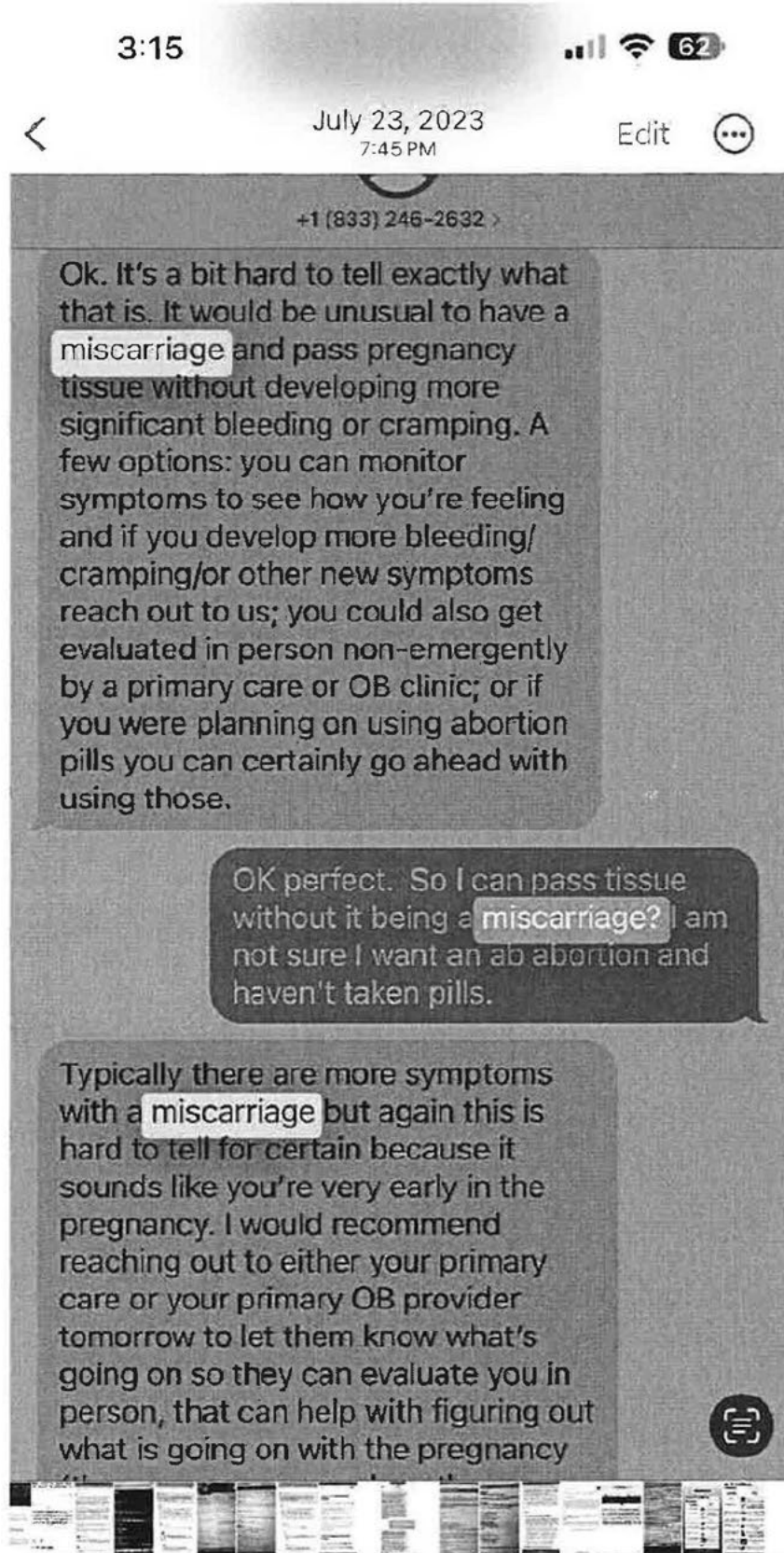
32. Although I had not made a final decision about terminating the pregnancy, I wanted Planned Parenthood to give me the medication so I could take it home with me and have it available in case I made the decision to terminate. However, Planned Parenthood told me patients were not allowed to leave with 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.

<b>Report Status FINAL</b>		 <b>Sonora Quest Laboratories</b> <small>A Subsidiary of Laboratory Sciences of Arizona</small>	
Route 1006 Ordered by: <b>Any Lab Test Now Scottsdale</b> 8989 E Via Linda Suite 111 Scottsdale, AZ 85258			
<b>Judy Hunter, MD</b>		<b>Patient Information:</b> <b>OWENS, LAURA</b>	
Account: 13288	Collected: 10/16/2023	<b>Order #: 132885018873 / NL93226479</b>	
#:	Received: 10/16/2023 09:02 PM	Sex: F	Age: 33Y-5M-2D
791	Reported: 10/17/2023 12:27 AM	Patient Phone:	
TEST	RESULTS	REFERENCE RANGES	UNITS PL
<b>CHEMISTRY</b>			
<b>hCG Quantitative</b>	<b>102 H</b>	≤4	mIU/mL
<b>hCG Reference Ranges:</b> 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.			
<b>Tests Ordered: hCG Quantitative</b>			

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