

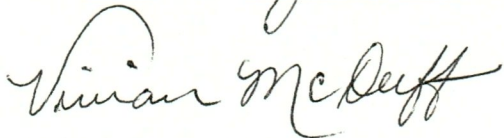
"DECLARATION" of Vivian McDuff

I hereby make this a sworn declaration under penalty of perjury and further declare that the following stated facts are true and correct based on my personal knowledge.

1. My name is Vivian McDuff. My son is Gary McDuff.
2. On May 18, 2016, I underwent surgery to screw both C2 bones together, which had been broken in an automobile accident two day earlier. After the metal plate was implanted, my doctor advised me that I should not travel any distance until the bones were completely healed. The risk was that if the plate moved, it could cause paralysis.
3. Gary McDuff, my son, was facing his Hearing with Judge Cameron Elliot. I had a decision to make. Because my son is fighting for his life, my decision was to be with my son for his Hearing. My son, John, secured me in a braced position for the two hour trip to Beaumont.
4. When my older son, John, and I arrived, I saw the SEC lawyers entering the building. I hurried to catch up to them, to follow them into the proper room for the Hearing.
5. At the reception desk, I was told my name was not on the list to attend the Hearing. I turned to Janie Frank, a SEC lawyer, and protested. I told her that I was on Gary's approved visitor list, and had been vetted long before. She replied to me that visiting an inmate and attending a Hearing were two different things. She said that she had informed Shiloh (Gary's son) that everyone had to complete the other form. However, her instructions letter also stated that it could take weeks to be approved. In other words, it was a useless exercise, since the instructions were sent only a few days, not weeks, before the Hearing was to convene.

So much for a "Public Hearing". Gary's mother, brother, aunt and uncle, all previously approved visitors, were denied entrance.

Dated 28 day of June 2016



Vivian McDuff

