

# EXHIBIT "B"

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

<b>MELISSA TYSON</b>	)	
<b>Plaintiff</b>	)	
	)	
<b>VS.</b>	)	<b>CIVIL ACTION NO. _____</b>
	)	
<b>COUNTY OF SABINE and SABINE</b>	)	
<b>COUNTY SHERIFF'S DEPARTMENT,</b>	)	
<b>CONSTABLE DAVID BOYD</b>	)	
<b>Defendants</b>	)	

**AFFIDAVIT OF HALEY LLOYD**

BEFORE ME, the undersigned notary, on this day personally appeared HALEY LLOYD who is known to me, upon her oath has said:

“My name is Haley Lloyd. I am over the age of 18 years of age. I am fully competent and to make this Affidavit. The facts stated in this Affidavit are within my personal knowledge and are true and correct.

“In September of 2016, my family and I rented a house from David Boyd who was an officer with the Sabine County Sheriff. Deputy Boyd stopped by one day and approached me about taking pornographic pictures for a porn website. Deputy Boyd stated that he and his friend “Jessica” saw me in town and that Jessica wanted to photograph me for the porn website and would pay me for the pictures. Deputy

Boyd pulled up the website on my phone to show me. I then questioned Deputy Boyd with the legality of the website.

“After a couple of days, Deputy Boyd returned to my home and again brought up the porn conversation and proceeded to tell me that pornography is legal and he would bring me a contract to sign. Deputy Boyd also suggested that I should leave my husband. Deputy Boyd continued to contact me every two to three days regarding these issues.

“My husband and I had an argument. Thereafter, my husband went to jail. While my husband was in jail, Deputy Boyd came to my house and stayed on my porch for approximately 2 hours. During that time, Deputy Boyd again brought up the porn website on his phone showing me the pictures. Deputy Boyd pressured me to take nude photos. He told me that he could pick me up down the road so that my husband would not find out. Deputy Boyd suggested taking me to a forest in Bronson to have the pictures taken.

“A few days later Deputy Boyd again came to the house and questioned me on my husband’s whereabouts. Deputy Boyd stated that he sent “Jessica” pictures of me. I did not know that he had pictures of me. He further stated that “Jessica” said she had people ready to pay for nude photos of me. Deputy Boyd stated that he would be present for the nude photo shoot so that I would not feel uncomfortable. Deputy Boyd also stated that I could get paid \$1,200.00 for the nude photos.

“Thereafter, my family and I moved from Deputy Boyd’s rental house, but still lived on the same street. One day, Deputy Boyd pulled up when I was outside and he was rubbing himself and telling me that he and his wife like to do different

sexual things. He continued to tell me that he heard that me and my husband were freaks and asked if we were "swingers." I asked Deputy Boyd if his wife knew what he was doing. At first he said no, then came back and said yes she knew everything.

"Once again Deputy Boyd came to my house and confronted me stating the he heard that I had been telling people all the things that Deputy Boyd has been trying to do to me. I denied it. Deputy Boyd began threatening me by stating that I would lose everything if I ever told anyone. Deputy Boyd threatened that I would lose my children. Deputy Boyd conducts the CPS investigations.

"In November, 2017 I received a call from my 16 year old son, who was in the custody of my mother. He wanted me to come pick him up in Orangefield. I went to pick up my son.

"A few days later my son was riding a dirt bike down the road and Deputy Boyd stopped him. I walked down the road to see what was happening. Deputy Boyd stated that he did not know the boy was my son, but that he couldn't ride it on the road. Deputy Boyd also stated that my mother had contacted the Sheriff's department regarding her custody of my son, but Deputy Boyd stated that he told her it was a civil matter and that they could not get involved.

"Ultimately, a CPS case was opened and my children were taken from me. Although no CPS caseworker came to my house, I was told that my house was unfit. I also failed a hair follicle test for methamphetamines. My husband and I were required to go to counseling. I reported Deputy Boyd's misconduct and threats to the CPS and the counselor, however, I was simply told to quit blaming others for my actions. Specifically, I reported Deputy Boyd's actions to our counselor, Scott

Hughes and Lindsey Welch, my CPS caseworker. I did not report his actions directly to the Sheriff's department because I was scared of further retributions by Deputy Boyd.


"After the CPS investigation, I came in contact with Deputy Boyd at a store in town. Deputy Boyd asked me how I was doing. I told him it was not going good as I still do not have my children. Deputy Boyd stated that if I would have just listened to him and cooperated, none of this would have happened.

"On a different day, I get stopped for speeding by Deputy Boyd. He taunted me about losing my children. I asked him how he would feel if everyone knew what he had done to me. He told me that I should have listened to him and left my husband. He stated that if I would have left my husband, I would have never lost my children. He told me that he would have taken care of me and the children if I would have just left my husband.

"Deputy Boyd continued his taunting by placing a copy of the CPS case in my mailbox."

"On or about May 29<sup>th</sup> Paula Jackson was arrested and sent to jail. She told everyone at the jail about Deputy Boyd's actions, threats and misconduct. Since that time, he has on one occasion taunted me again regarding the CPS case.

"FURTHER Affiant sayeth not."

  
HALEY LLOYD, Affiant

GIVEN under my hand and seal of office this the 23 day of April, 2019.



  
NOTARY PUBLIC, STATE OF TEXAS