

# EXHIBIT M

STATE OF NEW YORK  
SUPREME COURT: COUNTY OF ORLEANS

AB 511 DOE,

Plaintiff,

**AFFIDAVIT OF AB 511 DOE**

v.

Index No.: 20-46602

LYNDONVILLE CENTRAL SCHOOL  
DISTRICT AND LYNDONVILLE  
ELEMENTARY SCHOOL,

Defendants.

STATE OF NEW YORK    )  
                                  ) ss:  
COUNTY OF ERIE        )

██████████ states the following under penalty of perjury:

1. I am the plaintiff in the above-titled action, and I am proceeding under the pseudonym of AB 511 Doe. My legal name is ██████████

2. I recall that at the start of my fifth-grade year, Mr. Houseman would stand in the hallway between classes or during the A.M. class change and touch only male students inappropriately. For example, he would grab and touch only male students' genital areas as they walked by while laughing and making a "kissy face". He would also routinely hug and put his arm around the neck and shoulder of only little boys for long periods of time. He would do this while other teachers, students and school staff were in the hallway.

3. As I previously testified, Mr. Houseman was abusing me behind his desk when another teacher, Ruth Bane, walked in. This occurred shortly after he began abusing me in the

  
AB 511 Doe

fifth-grade school year, but I am unclear on the exact date. At the time of Mr. Housman's abuse in the classroom that day, I was standing, but my entire body was not blocking Mr. Houseman's body from the door as I was much smaller than he was. Mr. Houseman was also positioned perpendicular to me, facing the back wall, while I was to the side of him. My back was to the door at an angle with my left side slightly closer to the door than my right. His pants were unzipped, and Mr. Houseman had placed my hand in his pants.

4. I am confident Ms. Bane knew Mr. Houseman was being inappropriate with me at the time she walked in because when she walked in, she let out a loud gasp. I heard her and turned around by spinning to the left and stepping back. While I believe my hand came off of his lap when I turned and stepped back, my hand was actually inside his unzipped pants when Ms. Bane entered the room, and it could not simply slip off quickly and easily. Mr. Houseman's lap with my hand being removed from his unzipped pants would have been visible to Ms. Bane when I began turning to the left and stepping back, even if it was not fully visible to her before.

5. There was an uncomfortable pause before she started speaking, during which Mr. Houseman rotated his chair to turn his back to the door and clearly was either adjusting his pants or zipping them up. She was stumbling over her words as if she did not know what to say. They had a very short conversation before she quickly left the room.

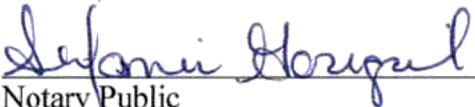
6. Mr. Houseman continued to abuse me after this incident and throughout the remainder of the school year.

7. During the fifth-grade school year, Mr. Houseman would also ask me to come to the school early where he then abused me in his classroom. I would go to the front door of the school building, and the janitor Gary Williams would let me into the school so I could go to Mr. Houseman's classroom. This happened multiple times per week during the school year.

DATED: June 27, 2023

  
[REDACTED] a/k/a AB 511 Doe

Sworn to before me this 27<sup>th</sup> day  
of June, 2023.

  
Notary Public

STEFANIE GARIGAL  
Notary Public, State of New York  
Reg. No. 01GA6403212  
Qualified in Erie County  
My Commission Expires January 21, 2024

  
AB 511 Doe