

TERESA RHOADES and MICHAEL)
RHOADES as parents and next friends of)
CHELSEA RHOADES, a minor,)

Plaintiffs,)

v.)

Cause No. 3:05-CV-00586

PENN HARRIS MADISON SCHOOL)
CORPORATION, DAVID R. TYDGATE,)
DAVID RISNER, STEVEN HOPE, VICKIE)
MARSHALL, MARNI CRONK, and)
MADISON CENTER, INC.,)

Defendants.)

AFFIDAVIT OF CHELSEA RHOADES

COMES NOW the affiant, Chelsea Rhoades, and makes the following statements which are based upon her personal knowledge:

1. I am 17 years of age and am competent to testify concerning the facts set forth in this affidavit.
2. On December 7, 2004, I was a student in the 10th grade at Penn High School and I am currently a student at Penn High School.
3. On December 7th, 2004, I was in home room and my home room teacher Mrs. Troyer announced that all of the class, with the exception of one student, would be going to Conference Room C in groups of five or six to take a test. The class asked Mrs. Troyer what the test we would be taking would we be. She told us she did not know and that the office had advised her to send the students down in groups. At the time I had no knowledge of what was taking place.

was helping my friend Stacie Reske, who was in a wheelchair, down to the room. When we arrived a woman told us to come in and sit down. The same woman began reading from a paper about the test. I was trying to get my friend situated in her seat because she could not wheel herself into place. After I had my friend's wheel chair in place the lady asked me to sign a piece of paper and I did as she instructed. The woman never told me that I could choose not to take the test, or that it was voluntary. I did not read the paper. I just thought the paper she had me sign was to acknowledge that I had taken the test.

5. We were then told to sign into the test on the computer and complete the test, answering the questions truthfully, and I followed these instructions. After I was finished, the group was told to wait outside in the hallway until another worker called us over. The group, including myself, went out into the hallway as instructed.

6. After about five minutes, a woman came out the testing room and called my name. The woman walked me several steps away from the other students. She told me, based on my answers, that I had Obsessive Compulsive Disorder for cleaning and social anxiety disorder, because I don't go out much. She then told me if I wanted to talk about it, I could talk to one of their counselors or have my mother call Madison Center for treatment.

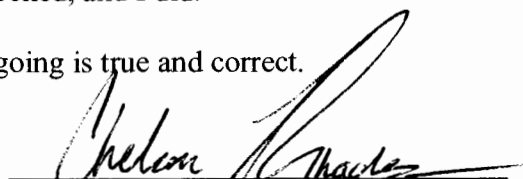
7. After the woman told me I had these two problems, I felt very upset and confused. I wasn't sure what these things were and I was afraid that it was something very serious. I felt this because I thought these people were like doctors. I thought about it all that day, and the more I thought about it the more upset I became. I wanted to know what these things were.

8. When I arrived at home after school I asked my mother, Teresa Rhoades, what social anxiety disorder and Obsessive Compulsive Disorder were and she told me. My mom then

disorders. Then my mom told me to explain what happened, and I did.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 17, 2006.



Chelsea Rhoades