

NORTH CAROLINA  
ORANGE COUNTY

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
10 CVS 149

RIELLE HUNTER,

Plaintiff,

v.

ANDREW YOUNG and CHERI  
YOUNG,

Defendants.

2010 FEB 22 P 4: 27

ORANGE COUNTY, C.S.C.

BY     *ella*    

**SECOND AFFIDAVIT OF  
RIELLE HUNTER**

RIELLE HUNTER, first being duly sworn, deposes and says:

1. My name is Rielle Hunter. I am over the age of eighteen and am competent to make this Affidavit.

2. I am seeking the return of my property, including a video recording of a personal and private nature (the "Video"), other video recordings, and photographs that I took or that were taken using my camera, including many that include my daughter. I am also seeking to preserve my privacy and to prevent further invasion of that privacy by Andrew Young and Cheri Young.

3. Andrew and Cheri Young have now, following several Court Orders and a finding of contempt, returned several items to the Court that belong to me. Since they did so, I have had the opportunity to view and identify those items, pursuant to an Order of the Court.

4. Among the items belonging to me that Andrew and Cheri Young returned to the Court is a MiniDV cassette marked "Special" and a VHS tape marked "Special" that Andrew and Cheri Young have represented to the Court to be a copy of video recording contained on the MiniDV cassette marked "Special."

5. I recently viewed the contents of a VHS copy marked "Special." The video recording on that VHS tape is a copy of the Video that was authored by me in September 2006. That Video was on a MiniDV cassette and I mangled and cut the tape to prevent any person from

ever seeing it. I know when and where the video recording shown on the VHS copy was made. I recognized that location when I viewed the VHS copy of the Video. I was not pregnant in September 2006 and the VHS copy of the Video does not show a pregnant woman.

6. Andrew Young and Cheri Young have repeatedly stated in public and to the Court under oath that the woman in the Video is "clearly," "visibly" or "noticeably" pregnant. Those statements are false.

7. Andrew Young stated publicly during his nationally aired "20/20" interview on ABC that the Video "was made just a couple of months before the Iowa caucuses." The Iowa Caucuses during the Edwards campaign were in early January 2008. Thus, Andrew Young stated that the Video was made "a couple of months" before January 2008. That statement is false.

8. It is true that "a couple of months" before January 2008, I was very noticeably pregnant. Andrew Young and Cheri Young are aware of how I appeared at that time. During that period, I was living at the Governor's Club, they were living in a separate house at Governor's Club and we saw one another with some frequency. In addition, among the photographs that the Youngs wrongfully took from me are several that reflected how I looked at points in November 2007. I also looked "noticeably" pregnant a couple of months before November 2007. There is no way that a person, such as Andrew or Cheri Young, who knew what I looked like in terms of pregnancy in the fall of 2007 could believe that the Video depicts me at that time. Andrew Young's and Cheri Young's numerous statements under oath in this case and to the national media that the Video was made a "couple of months before" the Iowa Caucuses and that it depicts a "noticeably," "visibly" or "clearly" pregnant woman are entirely false.

9. Any statement that the Video was made in 2007 is false. Any statement that the Video shows a pregnant woman is false.

10. Prior to this lawsuit, Andrew Young and/or Cheri Young had stated publicly that they had photographs of my daughter with her father. I authored the photographs and they belong to me. Because I had shown her such photographs, Cheri Young was aware that I had photographs of my daughter with her father and knew where I stored them.

11. When I had the opportunity to review the contents of three CD/DVD-Rs and one USB flash drive that contain photographs that Andrew and Cheri Young provided to the Court, it became clear that, instead of taking only the 8 photographs of my daughter with her father that I made in March 2008, they in fact had stolen from me approximately 150 photographs. The photographs taken from me by Andrew and/or Cheri Young thus include not only the 8 photographs of my daughter with her father but also a total of approximately 150 photographs, which are the photographs I took or that were taken with my camera between November 2007 and April 27, 2008. This set of photographs is included on each of the three CD/DVD-Rs (labeled "Laptop copied 2/9/10"; "From Desktop copied 2/9/10"; and "HMM pics copy 2") and also on the one USB flash drive that Andrew and Cheri Young returned to the Court.

12. As to all of these approximately 150 photographs, I did not upload any of these approximately 150 photographs to Andrew Young's and/or Cheri Young's computer and would not have done so, nor did I authorize anyone else to put such photographs on any computer belonging to Andrew Young and/or Cheri Young. I did not provide or give copies of such photographs to the Youngs at any time nor have I ever authorized them to use such photographs for their monetary gain or for any other purpose. At no time did I give the photographs or copies of the photographs to Andrew and/or Cheri Young.

13. Among the approximately 150 photographs that were taken from me by the Youngs are photographs that I took of myself and my expanding stomach as my pregnancy progressed. These are very personal and private to me and documented part of my journey to motherhood.

Many of these photographs were taken in a mirror and show my bare stomach and areas around it. These photographs were meant for me alone. I would not and did not give them or show them to or share them with Andrew Young or Cheri Young. It is entirely intrusive that I even have to describe these items in any way. That intrusion is a result of Andrew Young's and Cheri Young's wrongful acts in taking these items from me. Instead of making the decent and proper decision to simply return what belongs to me, Andrew Young and Cheri Young have forced me to seek my property through the Court and to try to preserve my privacy from further efforts by Andrew Young and Cheri Young to wrongfully take my property and my privacy from me.

14. In addition to the approximately 150 photographs that Andrew Young and/or Cheri Young wrongfully took from me, there were two pictures on the USB flash drive that they returned to the Court that are pictures of my pictures. It appears that Andrew Young and/or Cheri Young displayed my photographs on a screen and then used another device to take a picture of those photographs. There was no device or item provided to the Court that contained the originals of those pictures of my private photographs, which are copies of my photographs that should have been returned.

15. I kept the Video and the other video recordings in a hatbox along with various items that are significant to me. I never took the hatbox (or the Video or the other contents) to the house where Andrew Young and Cheri Young were living in September of 2007 and where I stayed for a couple of weeks until I moved into a house leased for me in Governor's Club on or around October 11, 2007.

16. After I left the house where the Youngs were living at Governor's Club and moved into the house leased for me in Governor's Club, I had my belongings, including the hatbox and its contents, moved to that house from my prior residence in New Jersey. When I left my Governor's Club house in December of 2007, I believed that I would be gone for only a couple of weeks so I

packed only for that time, taking one suitcase. I left many items of value and importance to me in my Governor's Club house including the hatbox and its contents. I did not abandon my property, including the Video and items in the hatbox. The lease for my Governor's Club house was to expire in or about October 2008. In September 2008, when I asked a trusted friend to pack my things in the house, my hatbox was there but the Video and other video recordings were missing.

17. I have never at any time had any intention to abandon or relinquish my rights in my property, including the Video or the other video recordings that I kept in my hatbox, the photographs of my daughter with her father or any of the other photographs that Andrew Young and/or Cheri Young took from me. Accordingly, I have never taken any action to relinquish or give up this property. I did not in fact abandon or relinquish my rights in those items. With respect to the Video and other video recordings, I maintained these items along with other items of importance and significance to me. With respect to the photographs, I have maintained them as items important to me on my own computer and/or camera and have not distributed them, including to Andrew and/or Cheri Young, nor have I authorized Andrew Young or Cheri Young to use such photographs.

18. In addition to the MiniDV cassette marked "Special," Andrew Young and Cheri Young returned four other MiniDV cassettes to the Court. Each of those four MiniDV cassettes contains video recordings that I authored. I also reviewed the VHS copies of those recordings that Andrew Young and Cheri Young returned to the Court, which also contain video recordings that I authored. It appears that, though Andrew Young and Cheri Young now claim to have only one copy of the video recording marked "Special," they maintained two VHS copies of the contents of the other MiniDV cassettes that they returned to the Court.

19. In addition to the items returned, there was an additional video recording that I authored in December 2006 during John Edward's campaign announcement tour. I further believe that Andrew Young or Cheri Young may have used that video recording during their media sales

tour. There is neither an original nor a copy of that video recording in the items that Andrew Young and Cheri Young returned to the Court. The Youngs also did not return a document they called the "Slut Club" document that they admitted was in their possession. That item was also stored in my hatbox but is no longer there.

20. Andrew Young has now testified before this Court that he showed part of the Video to one or more people at ABC before his interview on 20/20 that was part of his effort to sell his "book." It is not yet known to how many other people Andrew Young or Cheri Young may have shown the Video or my other private and personal items that they wrongfully took from me.

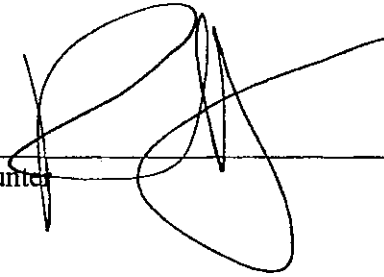
21. It is horrifying to me that my privacy has been so invaded, even more so because it was part of an effort by the Youngs to make money. Andrew Young and Cheri Young took my personal property that was extremely important to me, including the video recording marked "Special" that I intentionally mangled and cut to prevent anyone from viewing it. They repaired that tape, watched that tape, copied that tape, talked about it repeatedly on national television programs and showed it to others for their monetary gain. These items are mine. The Youngs can have no legitimate reason to want to keep them. They have already shown that their reason for taking and keeping my property was to invade my privacy and sell it for their personal gain.

22. The circle of people who have been able to pry into my private life as a result of the malicious actions and false words of Andrew Young and Cheri Young is far too broad. That invasion of my privacy at the hands of Andrew Young and Cheri Young needs to end.

FURTHER AFFIANT SAYETH NOT.

This the 22nd day of February, 2010.

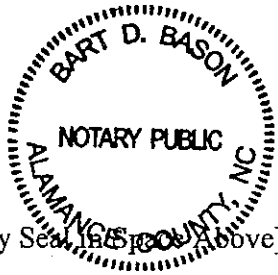
Rielle Hunter



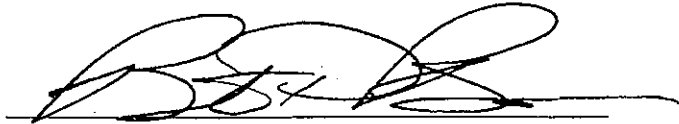
**STATE OF NORTH CAROLINA  
MECKLENBURG COUNTY**

I hereby certify that the foregoing was sworn to and subscribed before me this day by Rielle Hunter.

Today's Date: 22 February 2010



[Affix Notary Seal in Space Above]



[Notary's signature as name appears on seal]

BART D. BASON

[Notary's printed name as name appears on seal]

My commission expires: 9-18-2012

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was transmitted by facsimile pursuant to Rule 5(b) of the North Carolina Rules of Civil Procedure, as follows:

Robert M. Elliot  
David C. Pishko  
Eilliot Pishko Morgan P.A.  
426 Old Salem Road  
Winston-Salem, NC 27101  
Facsimile: (336) 724-3335  
*Attorneys for Defendants*

Mark E. Edwards  
Robert C. Trenkle  
Edwards & Trenkle, PLLC  
Facsimile: (919) 683-5650 and (919) 545-0991  
*Attorneys for Defendants*

This the 22nd day of February, 2010.

  
Allison O. Van Laningham