

ANNEX " 1 "

REPUBLIC OF THE PHILIPPINES)
MUNTINLUPA CITY)S.S.

AFFIDAVIT

I, **SHEEREE ANN L. KAW**, of legal age, Filipino, and with residence at No. 550 Purok Ilang-Ilang 2, Silangang Mayao, Lucena City, after having been duly sworn in accordance with law depose and state that:

1. I am the assistant coordinator at the Sankey Samaritan Mission, Inc. ("Sankey").
2. I was hired by Sankey in September 2002.
3. Sankey is an orphanage founded by Tom and Karen Randall. Sankey takes in children who were abandoned, neglected, panned, voluntary-surrendered, and abused.
4. As assistant coordinator, my duties include working on the Sankey's government permits. I also take charge of the financial aspect of the wards' schooling from high school to college, since these are funded by foreign sponsors and benefactors. I am also in charge of the wards' health requirements. I coordinate closely with the assigned social workers, as well as take overall administration of the orphanage.
5. Sometime in October 2012, the former social worker assigned to Sankey, [REDACTED], told me that a ward of the orphanage, [REDACTED], had accused the former director of operations, Mr. Perfecto "Toto" Luchavez of kissing her. Later, I found out from the nephew of Mr. Tom Randall, Joshua Kvam, who was staying at the orphanage, that [REDACTED] had told him the same story.
6. Sometime in September 2013, there was already some disorganization among the wards on account that [REDACTED] had been talking to them about the alleged incident involving Mr. Luchavez.
7. On 30 September 2013, Mr. Luchavez, Venancio Jumawan (the current social worker assigned to Sankey), and I discussed the matter with [REDACTED]. We learned that she had the impression that she would lose her schooling privileges because of her previous infractions, which I will relate in detail below.
8. Thereafter, she wrote a letter at that time stating:

Walang katotohanan ang lahat ng binibintang sa akin tulad ng, "pag-uutos na buksan ang log book", na ako daw ang pasimuno ng lahat ng kaguluhan, At hindi totoo ang pagbibintang kay Kuya Toto, Ate SheAnn at ni Mama Blesie. Hindi rin totoo na ako kay patitigilin sa pag-aaral.

"Patatapusin ako sa pag-aaral ni Kuya Toto at nangangako ako na tutuparin ko ang aking tungkulin na makatapos."

Humihingi ako po ng kapatawaran sa mga nagawa kong kasalanan kay Kuya Toto.

(Please see attached Letter dated 30 September 2013).

9. [REDACTED] has had a history of misbehaving and telling some untrue stories. She would usually lie about her true whereabouts, which would be disproved by the other staff members of Sankey who have actually seen her somewhere else.
10. For instance, prior to that meeting with [REDACTED] and after she had accused Mr. Luchavez of kissing her, Mr. Jumawan saw [REDACTED] in downtown Lucena kissing her boyfriend. [REDACTED] herself confirmed this to me personally that Mr. Jumawan had seen her in Lucena. I admonished her for having a boyfriend, because Sankey had a strict policy on its wards not being allowed to engage in romantic relationships until they finish their studies.
11. This was not the first time that [REDACTED] had violated this rule. In fact, there was one time when [REDACTED] was seen kissing a boy who was also a ward at Sankey.
12. Another serious offense was when [REDACTED] enrolled for a liberal arts-commerce (LIA-COM) course, when she had already committed to her benefactor in Australia that she would be taking up nursing. When I asked her about it, she said she would just explain the change of courses to Mr. Luchavez.
13. In fact, Mr. Luchavez at that time spoke to [REDACTED] Australian sponsors in order to intercede on behalf of [REDACTED] about the change in her enrolled course.
14. Based on the foregoing incidents involving [REDACTED], I honestly believe that her accusations against Mr. Luchavez are doubtful and should not be given any consideration because of the fact that [REDACTED] has been a delinquent ward, and she has been admonished several times by Mr. Luchavez and the other officers of the orphanage. She has also had a history of lying.
15. The same can be said for [REDACTED]. I honestly believe that his accusations against Mark Jayrold Luchavez ("Jake"), the son of Mr. Luchavez, and Mr. Luchavez himself are also false. During [REDACTED] entire stay in Sankey, he was quite notorious for his involvement in numerous disciplinary cases, which include his prohibited affair with a former male cook of Sankey, which eventually caused his removal from the orphanage.
16. It is my opinion that his act of initiating a complaint against Mr. Luchavez and Jake is actually his way of retaliating against Mr. Randall and Mr. Luchavez, at the expense of Jake, for his removal from Sankey.
17. Similarly, the accusations of [REDACTED] against Jake and Mr. Luchavez should not be given any consideration, as he was likewise a delinquent ward like [REDACTED] and [REDACTED]. He was fond of violating the orphanage rules that prohibit smoking, drinking, and having romantic relationships with fellow wards. [REDACTED] was also irresponsible with his schooling, wherein he would constantly receive failing grades in most of his subjects and would often cut classes. These facts were known to the social workers and the officers of Sankey, who frequently called him out on these violations.
18. Consequently, Mr. Luchavez was quite strict with [REDACTED] with the honest intention of reforming him to become a responsible young man. Hence, it is also of my opinion that [REDACTED] act of executing a damaging affidavit against Mr. Luchavez and Jake is actually his way of showing his aversion to the reasonable disciplinary measures imposed on him by the latter.

19. I firmly believe that based on the events that I narrated above that the accusations against Mr. Luchavez, and Jake are doubtful, or have been seriously misconstrued. They may also be the product of some other people feeding false stories to the wards and goading them into falsely accusing Mr. Randall, Mr. Luchavez, and Jake.
20. I say this because on Saturday, 16 November 2013, at around 10:00 a.m., heavily-armed men forcibly entered the premises of Sankey without any justification. The men were accompanied by Joe Mauk, a teacher at Sankey named [REDACTED]; and Miriam Mauk, among others.
21. However, because of the actions of Mr. Luchavez of calling the military and the police to help with the situation, the heavily-armed men and the people who accompanied them left immediately.
22. On 13 January 2013, at around 5:30 a.m., everyone in Sankey were surprised when agents of the National Bureau of Investigation (NBI) arrested Tom Randall, Perfecto "Toto" Luchavez, Jr., and Mark Jayroid "Jake" Luchavez (board member). The NBI agents did not produce any warrant to justify their presence. They simply said that they would be bringing us to NBI. Thereafter, the NBI and the DSWD personnel who were with the NBI also took custody of the Sankey orphans.
23. I was even more surprised when the wards who were taken away informed me through text message Miriam Mauk and [REDACTED] were also in the bus going to NBI.
24. I firmly believe that the filing of the complaint against Mr. Randall, Mr. Luchavez, and Jake was orchestrated by Joe Mauk, [REDACTED], Miriam Mauk, and [REDACTED].

AFFIANT FURTHER SAYETH NONE.

IN WITNESS WHEREOF, I have here placed my hand this 22nd day of January 2014.


SHERREE ANN L. KAW
Affiant

SUBSCRIBED AND SWORN to before me this 22nd day of January 2014 in Muntinlupa, affiant exhibited to me her SSS ID No. 04-1210052-7 as a valid identification and competent evidence of identity bearing her photograph and signature.


RAQUEL R. BUENDIA

NOTARY PUBLIC
Notary Public for Muntinlupa City

Until December 31, 2015

Notarial Commission No. 14-037

Roll of Attorneys No. 461-44

IBP No. 951902/01.06.14/PPM

PTR No. 1479216/01.06.14/Muntinlupa City

MCEE Compliance No. IV-0010202/12.11.12

Suite 806 Park Trade Centre, 1716 Investment Drive,

Madrigal Business Park, Ayala-Alabang,

Muntinlupa City

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