



Oklahoma High School

Mock Trial Program

2023-2024

Dempsey Carlisle,
as Parent and Next of Kin of Blake Carlisle, Deceased

v.

Archer DeGray

Written by:

OBA Mock Trial Case Development Committee

The Mock Trial Committee thanks our dedicated Case Development Committee for this exciting original case. We hope you find these materials interesting and educational. This is a work of fiction. All names, characters, events and incidents are either the product of the authors' imaginations or used in a fictitious manner. Any resemblance to actual persons, living or dead, or actual events is purely coincidental. Best of luck during the competition!



OKLAHOMA
BAR FOUNDATION
Law. Education. Justice.

Oklahoma Bar Foundation, IOLTA Grant

WITNESS AND EXHIBIT LIST

| PLAINTIFF WITNESSES | DEFENSE WITNESSES |
|----------------------------|--------------------------|
| Dempsey Carlisle | Archer DeGray |
| Roux “Rue” Collins | Maycin Lochlan |
| Palmer Echols | Dallas Exeter |

| EXHIBIT* | EXHIBIT NAME |
|---|--|
| Exhibit 1 | Posts, images, and selected materials from DeGray’s social media. |
| Exhibit 2 | DeGray’s Answers to Plaintiff Carlisle’s Requests for Admissions per 12 O.S. § 3236 |
| Exhibit 3 | Opinion Editorial news article from Plaintiff Carlisle Family |
| Exhibit 4 | Photographs of DeGray Property and “RC Ride Challenge” |
| Exhibit 5 | Medical Examiner Report- Examination of Blake Carlisle |
| Exhibit 6 | Chemical testing of “RC Ride Challenge” Drinks |
| Exhibit 7 | Defendant Archer DeGray’s Criminal File with Plea Agreement |
| Exhibit 8 | Plaintiff’s Expert Report: Palmer Echols |
| Exhibit 9 | Defense Expert Report: Dallas Exeter |
| <p>*The preceding exhibits may be used by teams in the competition. They are pre-marked and are to be referred to by number.</p> | |

STIPULATIONS

The Plaintiff and Defense stipulate to the following facts:

1. There is no issue of jurisdiction or venue.
2. The applicable law is contained in the jury instructions. These may not be read into the record. Pleadings and jury instructions may not be objected to at the trial.
3. The exhibits are true and authentic copies. Their authenticity may not be challenged. Unless stated otherwise, admissibility of exhibits may be challenged on other grounds.
4. The witnesses gave their statements on the dates indicated in the case. Each witness was given the opportunity to review the statement prior to and in preparation for trial.
5. The trial is only addressing whether Defendant is liable to Plaintiff. The damages phase shall take place only if Defendant is found liable. Any reference to possible damages, including the range of potential damage awards, is immaterial and inadmissible.
6. Whenever a rule of evidence requires that reasonable notice be given, it has been given.
7. Defense counsel was present for Defendant's statement.
8. There is no issue with Dempsey Carlisle bringing the claims in this case as Parent and Next of Kin to Blake Carlisle, Deceased. Standing is proper.
9. All discovery requests and responses exchanged between the Parties were timely provided and certified.
10. Sawyer Edgar, M.D. the State of Oklahoma's Medical Examiner performed a limited examination/autopsy of Decedent as described in the enclosed exhibit. The M.E. is not a witness in this trial and was acting in a private capacity. The Carlisle family paid for Edgar's work and the report was disclosed and exchanged in discovery. No comments, inferences, or other remarks shall be made by either side of the case on the absence of the Medical Examiner as a trial witness. The respective experts incorporate the M.E. Report into their reports, opinions, and testimony and the materials may be subjected to direct/cross examination accordingly.

STATEMENT OF THE CASE

(This is intended as a summary only and not to be used as evidence in the trial)

“When Influence Harms Innocence”

Social media and the ever-changing methods of electronic connection between individuals has become a significant aspect of everyday life for many people across the world. The significance of social media is greater in the lives of teenagers and young adults in America. A 2018 Pew Research Center survey of nearly 750 13- to 17-year-olds found that 45% are online almost constantly and 97% use a social media platform, such as YouTube, Facebook, Instagram or Snapchat. There are certainly benefits to social media use, including communication with others, the creation of social networks, the spread of information, entertainment, self-expression and learning/research. These social networks can provide valuable support and resources for those who experience exclusion, have disabilities, illnesses, or are facing a challenging situation in their lives. A user can navigate through an overwhelming world of information and filter it all down to specific points directly relevant to the particular needs, interests, and wants of that single individual. In many ways, social media use can be healthy and productive.

Social media has replaced and expanded the function of traditional news outlets/entities in gathering and disseminating information on current events, causes, incidents, and topics of interest. Social media can be a critical source for documenting, recording, and preserving events with world-wide significance. People can be exposed to and can interact with others involved in events across geographic boundaries and, often, in real-time as they are occurring. Essentially, social media can allow an individual access to the entire world on-demand. Conversely, the entire world can access an individual, resulting in negative effects.

While adverse effects are not limited to a specific age or generation, many studies have focused on social media’s impact on teenagers and young adults because these individuals have grown up with social media. Specific to these groups, social media can become distracting and disrupting to their lives in the “real-world”. Teens can be exposed to bullying, rumor spreading, unrealistic views of other people’s lives, distorted understandings of self-worth, value, identity, and increased exposure to peer pressure. A 2019 study of more than 6,500 12- to 15-year-olds in the United States found that those who spend more than three hours a day using social media might be at heightened risk for mental health problems. Another 2019 study of 12,000 13-to 16-year-olds in England found that using social media more than three times a day predicted poor mental health and well-being. Other studies have observed links between high levels of social media use and symptoms of depression and anxiety. Many studies have focused on the “social comparison” aspects of social media- where users compare their own lives to the lives of others as they appear on social media. Unsurprisingly, increased social media use and “social comparison” exposure can lead to unhealthy consequences, especially for teenagers and young adults. In modern society, there is little dispute that social media can have significant influence on users. Too often, that influence can be overwhelming and can result in drastic and life-altering consequences.

This case is a civil trial focused on the death of Blake Carlisle on July 1, 2022, and the events leading to that incident. The Defendant, Archer DeGray, is being sued by Dempsey Carlisle as Parent and Next of Kin to Blake. Plaintiff alleges Defendant engaged in conduct that was negligent, reckless, and in disregard for the health, safety and well-being of Blake, resulting in death. Criminal charges were filed by the local district attorney against Defendant, but an agreement was reached for a deferred sentence with subsequent expungement based on Defendant’s compliance with certain community service work.

LEGAL AUTHORITY

Oklahoma Statutes:

- **Pleading Code**

- **12 Okla. Stat. § 2003-** Commencement of Action. A civil action is commenced by filing a petition with the court.
- **12 Okla. Stat. §2012-**Defenses and Objections. A defendant shall serve an answer within twenty (20) days after service of the petition upon the defendant.

- **Discovery Code**

- **12 Okla. Stat. § 3226- General Scope of Discovery and Relevance**

- A. Parties may obtain discovery regarding any matter, not privileged, which is relevant to any party's claim or defense, reasonably calculated to lead to the discovery of admissible evidence and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Information within the scope of discovery need not be admissible in evidence to be discoverable.
- B. SUPPLEMENTATION OF RESPONSES. A party who has responded to a request for discovery with a response that was complete when it was made is under no duty to supplement the response to include information thereafter acquired, except as follows:
 - a. A party is under a duty to seasonably amend a prior response to an interrogatory, request for production, or request for admission if the party obtains information upon the basis of which: 1) the party knows that the response was incorrect in some material respect when made; or, 2) the party knows that the response, which was correct when made, is no longer true in some material respect.
- C. SIGNING DISCOVERY RESPONSES. Every discovery response shall be signed by the party responding to the requests. The signature of the party constitutes a certification that the party has read the request, and the response is: 1) to the best of the party's knowledge, information and belief formed after a reasonable inquiry consistent with the Oklahoma Discovery Code and warranted by existing law; and, 2) answered in good faith and not primarily to cause delay or for any other improper purpose.

- **12 Okla. Stat. § 3236- Requests for Admission**

- A. REQUEST FOR ADMISSION. A party may serve upon any other party a written request for admission, for purposes of the pending action only, of the truth of any

matters with the scope of relevant discovery that relate to statements or opinions of fact or of the application of law to fact. Each request shall be separately set forth. The matter is admitted unless the party to whom the request is directed serves upon the party requesting the admission a timely written answer or objection.

- B. EFFECT OF ADMISSION. Any matter admitted under this section is conclusively established unless the court on motion permits withdrawal or amendment of the admission before trial of the pending matter.
- C. SCOPE OF ADMISSION. Any admission made by a party under this section is for the purpose of the pending action only and is not an admission for any other purpose nor may it be used against the responding party in any other proceeding.

JURY INSTRUCTIONS

Oklahoma Uniform Jury Instructions (OUJI):

- **§ 2.1- Issues In the Case- No Counterclaim**

The parties to this case are Dempsey Carlisle, Individually and as Parent and Next Kin of Blake Carlisle, Plaintiff, and Archer DeGray, Individually, Defendant. The parties admit Blake Carlisle died on July 2, 2023, as the result of a single-car motor vehicle accident. Plaintiff claims Defendant is liable for the death of Blake Carlisle. Defendant denies Plaintiff's claims.

- **§ 3.1- Burden Of Proof- Greater Weight of the Evidence**

In a civil lawsuit, such as this one, the law provides which party is to prove certain things to you. This is called the "Burden of Proof". In this case Plaintiff bears the burden of proof by the greater weight of the evidence.

"Greater weight of the evidence" means you must be persuaded, considering all the evidence in the case, that the proposition on which such party has the burden of proof is more probably true than not true. The greater weight of the evidence does not mean the greater number of witnesses testifying to a fact, but means what seems to you more convincing and more probably true.

A party who seeks to recover on a claim has the burden to prove all the elements of the claim or defense. In deciding whether a party has met the burden of proof, you are to take into account all the evidence, whether offered by that party or another party.

- **§ 3.3- No Speculation**

Your decision must be based upon probabilities, not possibilities. It may not be based upon speculation or guesswork.

- **§3.13- Determining Credibility (Believability) of Witness**

You are the sole judges of the believability of each witness and the value to be given the testimony of each. You should take into consideration the witness's means of knowledge, strength of memory and opportunities for observation. Also consider the reasonableness and consistency or inconsistency of the testimony.

You should also consider the bias, prejudice, or interest, if any, the witness may have in the outcome of the trial, the conduct of the witness upon the witness stand, and all other facts and circumstances that affect the believability of the witness.

- **§3.21- Expert Witness**

There has been introduced the testimony of witnesses who are represented to be skilled in certain areas. Such witnesses are known in law as expert witnesses. You may consider the testimony of these witnesses and give it such weight as you think it should have, but the value to be given their testimony is for you to determine. You are not required to surrender your own judgment to that of any person testifying as an expert or otherwise. The testimony of an expert, like that of any other witness, is to be given such value as you think it is entitled to receive.

- **§3.25- Direct and Indirect (Circumstantial) Evidence**

"Direct evidence" is the testimony of a person who asserts actual, personal knowledge of a fact, such as the testimony of an eyewitness. "Direct evidence" may also be an exhibit such as a photograph which demonstrates the existence of a fact. It is proof which points immediately to a question at issue and which proves the existence of a fact without inference or presumption.

"Circumstantial evidence" is the proof of facts or circumstances which gives rise to a reasonable inference of other connected facts.

The law makes no distinction between the weight to be given to either direct or circumstantial evidence. You should consider circumstantial evidence together with all the other evidence in the case in arriving at your verdict.

- **§9.1- Negligence- Elements of Liability**

A party claiming damages has the burden of proving each of the following propositions:

First, that [he/she] has sustained injury;

Second, that the party from whom [he/she] seeks to recover was negligent;

And, third, that such negligence was a direct cause of the injury sustained by the claiming party.

- **§9.2- Negligence-Defined**

Since this lawsuit is based on the theory of negligence, you must understand what the terms "negligence" and "ordinary care" mean in the law with reference to this case.

"Negligence" is the failure to exercise ordinary care to avoid injury to another's person or property. "Ordinary care" is the care which a reasonably careful person would use under the same or similar circumstances. The law does not say how a reasonably careful person would act under those circumstances. That is for you to decide. Thus, under the facts in evidence in this case, if a party failed to do something which a reasonably careful person would do, or did something which a reasonably careful person would not do, such party would be negligent.

- **§9.3- Ordinary Care-Defined**

Ordinary care is the care which a reasonably careful person would use under the same or similar circumstances.

- **§9.6- Direct Cause-Definition**

Direct cause means a cause which, in a natural and continuous sequence, produces injury and without which the injury would not have happened. For negligence to be a direct cause it is necessary that some injury to [the property of] a person in [Plaintiff's] situation must have been a reasonably foreseeable result of negligence.

- **§9.8- Intervening Cause-Definition**

An intervening cause is one that interrupts or breaks the connection between a defendant's act [or omission] and a plaintiff's injury. Defendant's act or omission would not be the direct cause of Plaintiff's injury if another event intervened between the two and that event was:

1. Independent of Defendant's act or omission;
2. Adequate by itself to cause Plaintiff's injury; and
3. Not reasonably foreseeable by Defendant.

- **§9.14- Assumption of Risk**

Plaintiff's Decedent assumed the risk of injury resulting from Defendant's negligence if they voluntarily exposed themselves to injury with knowledge and appreciation of the danger and risk involved. To establish this defense, Defendant must show by the weight of the evidence that:

1. Plaintiff's Decedent knew of the risk and appreciated the degree of danger;
2. Plaintiff's Decedent had the opportunity to avoid the risk;
3. Plaintiff's Decedent acted voluntarily; and
4. Plaintiff's Decedent's action was the direct cause of their injury.

- **§9.51- Willful and Wanton Conduct-Definition**

The conduct of Defendant was willful and wanton if Defendant was either aware, or did not care, that there was a substantial and unnecessary risk that the conduct would cause serious injury to others. In order for the conduct to be willful and wanton, it must have been unreasonable under the circumstances, and also there must have been a high probability that the conduct would cause serious harm to another person.

**THE DISTRICT COURT OF TRAVIS COUNTY
STATE OF OKLAHOMA**

| | | |
|---|---|--------------------|
| DEMPSEY CARLISLE, Individually |) | |
| and as Parent and Next of Kin of |) | |
| BLAKE CARLISLE, Deceased, |) | |
| |) | |
| PLAINTIFF, |) | |
| |) | |
| vs. |) | CJ-2023-247 |
| |) | |
| ARCHER DeGRAY, Individually, |) | |
| |) | |
| DEFENDANT, |) | |

PETITION

Plaintiff DEMPSEY CARLISLE, Individually and as Parent and Next of Kin of BLAKE CARLISLE, brings this suit and claims against ARCHER DeGRAY (“Defendant”) and alleges and states as follows:

1. Plaintiff Dempsey Carlisle is an individual resident of Travis County, State of Oklahoma.
2. Plaintiff Dempsey Carlisle is the natural Parent and Next of Kin of Blake Carlisle, Deceased.
3. Defendant Archer DeGray is an individual believed to be a resident of Travis County, State of Oklahoma.
4. This matter arises from the wrongful death of Blake Carlisle on July 1, 2022, caused by the actions of Defendant all of which occurred within Travis County, State of Oklahoma.
5. This Court has jurisdiction over this subject matter and the parties.
6. Venue is proper in this Court.
7. Plaintiff, as the natural parent and next of kin of Blake Carlisle, is the proper party to bring these claims against Defendant.

FACTS FOR NEGLIGENCE

8. Plaintiff incorporates all preceding paragraphs of this Petition here.

9. Defendant owed a duty of care to Blake Carlisle, and others, based on the relationship established by Defendant over Decedent, the influence exercised by Defendant over Decedent, the direct and indirect control exerted by Defendant over Decedent, the participation in certain activities by Decedent through financial incentives and “quasi-contractual” requirements established by Defendant.

10. Said activities included the unintentional and unknowing consumption of liquids and substances, that included hidden intoxicating and sedating ingredients, by Blake Carlisle and others.

11. This activity was identified by Defendant and others as the “RC Ride” challenge- an attempt to create a social media trend to increase Defendant’s on-line profile and provide financial income to Defendant at the expense, health, safety and welfare of others, including the life of Blake Carlisle.

12. The liquids and substances involved in the “RC Ride” were created by Defendant and provided directly to Blake Carlisle and others by Defendant without disclosure of the contents and substances comprising the liquids.

13. Defendant labelled these substances as “Up Shot” and “Down Ride”, with “Up Shot” containing stimulants and “Down Ride” containing depressants of varying compositions.

14. The participants were not informed of the true contents of the liquids and substances that were being provided by Defendant and Defendant required each participant to consume these liquids multiple times at every-increasing volumes to receive financial compensation.

15. On or around June 29-July 1, 2022, Defendant provided financial compensation to persons for their participation in the “RC Ride” challenge- a series of alternating ingestion of

stimulants and depressant substances over a multi-hour and multi-day time period such that the participants became incapacitated, intoxicated, incoherent, and otherwise incapable of independent thought resulting in impaired decision-making.

16. Upon best information and belief, Archer DeGray engaged in negligent conduct with reckless disregard for the life and wellbeing of Blake Carlisle, and others, involving directing, facilitating, promoting, influencing, and participating in a series of events and activities that lead directly and proximately to the death of Blake Carlisle.

17. Defendant is a self-proclaimed “influencer” who seeks to influence others by and through Defendant’s social media profiles which promote reckless, dangerous, and harmful conduct.

18. Defendant has a pattern of exercising such influence over others that Defendant controls the actions, decisions, conduct, and activities of others- described as “followers”.

19. Defendant exercises control over others by incentivizing desired and intended conduct through false representations of wealth, fame, influence, improved living conditions, a better life, and direct financial compensation for participation in reckless, dangerous, and harmful conduct.

20. Blake Carlisle was recruited by Defendant for involvement in several events to promote and expand Defendant’s influence and financial interests.

21. Blake Carlisle was directed by Defendant to participate in dangerous conduct, including the “RC Ride” challenge from June 28-July 1, 2022 when Blake Carlisle was involved in a single-car motor vehicle accident with fatal injuries resulting.

22. On the evening of July 1, 2022, Blake Carlisle had participated in approximately 52 hours of the “RC Ride” challenge on Defendant’s property, having consumed numerous containers of “Up Shot” and “Down Ride” through the same time period.

23. Defendant facilitated the “RC Ride” challenge and hosted the event on Defendant’s family’s property. Participants were not allowed to leave until they completed the 48 hours of the challenge.

24. On the evening of July 1, 2022, Defendant encouraged, directed, allowed, and facilitated the operation of a motor vehicle by Blake Carlisle, who was incapacitated, intoxicated, sleep-deprived and in other ways impaired and unable to safely operate a motor vehicle.

25. Defendant directed Blake Carlisle to leave the property while impaired and with full knowledge of the clear, apparent, and serious risk of harm to Blake and others.

26. Defendant agreed to provide Blake Carlisle with significant financial compensation to operate the motor vehicle after “completing” the “RC Ride” challenge and recording Blake’s challenge completion celebration- which involved driving on the highway while recording the conduct on a personal cell phone.

27. Around 23:00 (11:00 p.m.) on July 1, 2022, Blake Carlisle was involved in a single-car motor vehicle accident when the vehicle left the roadway at a high rate of speed and impacted an overpass resulting in serious and fatal injuries to Blake Carlisle.

28. The injuries and death of Plaintiff’s child Blake Carlisle was the direct and proximate result of the careless and negligent actions of Defendant Archer DeGray.

29. Defendant’s actions were so extreme and outrageous as to go beyond all possible bounds of decency and would be considered atrocious and utterly intolerable in a civilized society.

30. Defendant engaged in conduct to influence and direct the participation of Blake Carlisle in dangerous activities leading directly to foreseeable and preventable harm and death.

WRONGFUL DEATH AND PUNITIVE DAMAGES

31. Plaintiff incorporates all preceding paragraphs of this Petition here.

32. Defendant's actions reveal reckless disregard for the rights of others and infer malice and willful intent entitling Plaintiff to punitive damages in an amount in excess of \$75,000 for the injuries, harm, and wrongful death of Blake Carlisle.

33. Defendant knew the contents of the "RC Ride" challenge liquids and substances and failed to disclose the same to the participants in the "RC Ride" challenge.

34. Defendant knew or should have known that the RC Ride challenge liquids and substances when consumed would result in intoxicated and impaired functioning.

35. Further, Defendant knew or should have known that prolonged consumption of the "RC Ride" challenge liquids and substances would increase the intoxicated and impaired state of participants- further increasing the risk of harm and serious injuries.

36. Also, Defendant knew that participants who consumed the "RC Ride" challenge liquids and substances over a multi-day time period would be sleep-deprived, further increasing the intoxicated and impaired state of functioning for participants.

37. Defendant knew, directed, encouraged and compelled participation in the "RC Ride" challenge from June 29-July 1, 2022, by providing financial incentives and compensation in amounts in excess of \$10,000 per participant.

38. The financial compensation paid by Defendant to "RC Ride" challenge participants increased in amount for more participation, including a challenge competition celebration where participants received \$5,000 to record themselves driving on the highway as they "celebrated with the world watching".

39. The actions of Defendant show a complete disregard for the safety of others and show an intent to subject others to deadly harm.

40. Defendant's actions were intentional and should be punished to the fullest extent of law.

41. Plaintiff demands a punitive award against Defendant in an amount in excess of \$10,000,000.00 so that no other persons are ever subjected to such depraved conduct.

WHEREFORE, premises considered Plaintiff demands damages in an amount in excess of \$75,000.00 for Defendant's negligence, in an amount in excess of \$10,000,000.00 for the wrongful death of Blake Carlisle and punitive damages against Defendant to punish and sanction Defendant's depraved conduct. Plaintiff further requests an award of all costs, interest and other relief this Court deems just and proper.

Respectfully submitted,

Rudy Baylor

Rudy Baylor
RAINMAKER LITIGATION FIRM
101 Park Avenue
Oklahoma City, OK 73102
ATTORNEY FOR PLAINTIFF

**THE DISTRICT COURT OF TRAVIS COUNTY
STATE OF OKLAHOMA**

| | | |
|---|---|--------------------|
| DEMPSEY CARLISLE, Individually |) | |
| and as Parent and Next of Kin of |) | |
| BLAKE CARLISLE, Deceased, |) | |
| |) | |
| PLAINTIFF, |) | |
| |) | |
| vs. |) | CJ-2023-247 |
| |) | |
| ARCHER DEGRAY, Individually, |) | |
| |) | |
| DEFENDANT, |) | |

ANSWER

Defendant Archer DeGray comes and for this Answer to Plaintiff Dempsey Carlisle’s Petition, alleges and states as follows:

Defendant denies generally and specifically each and every material allegation contained in Plaintiff’s Petition, except as such allegations are hereinafter specifically admitted.

1. Defendant DeGray denies Paragraphs 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 24, 25, 28, 29, 30, 32, 34, 35, 36, 39, 40, and 41 of Plaintiff’s Petition and demands strict proof thereof.

2. Defendant DeGray admits Paragraphs 3, 5, 6, 20, 22, 23, 33, 37, and 38 of Plaintiff’s Petition.

3. Defendant DeGray is without sufficient information or knowledge at this time to admit or deny the allegations in Paragraphs 1, 2, 4, 7, and 27 of Plaintiff’s Petition and therefore denies the same and demands strict proof thereof.

4. Defendant admits Paragraph 26 of Plaintiff’s Petition in part and denies the same in part. Participants were provided fair compensation for their time and review/feedback, but at no point was anyone, including Blake Carlisle, required or compelled to participate in any activity.

5. Paragraphs 8 and 31 of Plaintiff's Petition are "incorporation" paragraphs and do not require a response from Defendant. To the extent a response is deemed necessary, Defendant denies these Paragraphs and demands strict proof thereof.

Affirmative Defenses

For further answer and defense to Plaintiff's claims, Defendant offers the following affirmative defenses:

1. Plaintiff's alleged damages, if any, were the result of an independent, supervening action that absolves Defendant of any liability.

2. Plaintiff's Decedent assumed the risk of participation in the "RC Ride" challenge and such knowledge by Plaintiff's Decedent prior to participation absolves Defendant of any liability.

3. No action or omission by Defendant was the or a direct cause of the alleged damages, if any, claimed by Plaintiff. Thus, Defendant is absolved of any liability for Plaintiff's claims.

WHEREFORE, Defendant Archer DeGray having answered prays Plaintiff Dempsey Carlisle take nothing by way of the Petition or prayers, that judgment be entered in Defendant's favor, and that Defendant be awarded costs along with any other relief this Court deems just and proper.

Sincerely,

L. Drummond

Leo F. Drummond
DEARNS, DRUMMOND & ROEBUCK, PLLC
P.O. Box 10293847
Oklahoma City, OK 73113
ATTORNEYS FOR DEFENDANT

STATEMENT OF MAYCIN LOCHLAN

1 I am Maycin Lochlan- it's pronounced "May-son". I've followed Archer DeGray for
2 several years. I was super excited to get selected to participate in the June-July 2022 program. A
3 huge part of Archer's influence on others comes from a broad and active social media presence.
4 Archer's content is great and absolutely worth the time to watch and follow. Everyone has a few
5 mistakes in their past and the whole "glue ourselves to the highway" thing a few years ago was
6 certainly not received well by the public. However, that's what some true artists do-they make the
7 public face and confront issues of the time. I do believe Archer recovered well from that and was
8 about to change the world with the "RC Ride" program. Too bad it didn't go according to plan.

9 Look, I think everyone participating in the RC Ride challenge was an adult and knew what
10 they were getting into. I certainly understood what was going on. I wasn't forced to drink
11 anything. I wasn't forced to do anything. I willingly participated in what should have been the
12 origin of a huge social media trend to change and improve many lives. I guess a couple of lives
13 have been changed. A parent who is upset that their adult kid couldn't handle the ride and an artist
14 who only sought to better the lives of others. It's not wrong for someone to want to share their
15 success with others, right? Why should we let a true visionary of our community be torn down by
16 the money-seeking family of the only person that had a bad experience? Was anyone else harmed
17 from the RC Ride challenge? I'm not aware of any others. I came out on the other side better,
18 stronger, and more aware of my personal limitations. I believe the RC Ride program hosted and
19 facilitated by Archer was a highlight of my life and I would participate again without hesitation.

20 I certainly agree that the "Up Shot" drink seemed to have a punch with it and I wasn't
21 feeling well after several cycles of the Up Shot and Down Ride portion, but we had to get outside
22 our comfort zones to expand our limitations. Pushing yourself beyond comfort is certainly

1 uncomfortable. I did not feel like I was ever completely out of control or unable to know what
2 was going on around me- at least not on the “Up Shot” sections. The “Down Ride” sections just
3 made me fall asleep, fairly quickly. I slept incredibly well during those down times, and I certainly
4 felt like I was maximizing my rest periods. I was very groggy until we got to the “Up Shot”
5 portions and the energy in that guest house was electric throughout each day. We had a schedule
6 to follow for the “RC Ride” challenge and there was snack food available the whole time.

7 The June 29-July 1, 2022, event was great. We arrived at the DeGray property’s gate just
8 before 6:00 p.m., we were let in and directed to the guest house in the back. We walked along a
9 tree-lined park to the guest house where we all stayed for the two-night program. There was a
10 large gathering area on the first floor-which was where the group sessions occurred. The DeGray
11 property is amazing. The pictures provided by Archer show the guest house and surrounding
12 grounds. That one with columns is special because that is the spot where those of us who
13 completed the program meet one-on-one with Archer to discuss the program before leaving.

14 Just after arriving on June 29th, we were given the first “Up Shot” drink and those first few
15 hours were like nothing I’d ever experienced before. Everyone was super talkative, we all engaged
16 with each other, we learned about each other and had fun while getting settled in. Then, around
17 10 p.m., we were given the first Down Ride beverage and I remember feeling things slowdown
18 that evening. I don’t remember sleeping, but I certainly remember the 4:00 a.m. double “Up Shot”
19 session a few hours later on June 30th- Day 2.

20 Later that morning, we were given four more “Up Shot” drinks around 10:00 a.m. That
21 first full day was one of the most productive days of my life. We shared stories of personal
22 triumphs and trials. We discussed how to squeeze the most out of every day we are given in life.
23 There was a rest period around 2:00 p.m. that day and we all had two Down Ride drinks to

1 maximize that rest time. I really enjoyed that late-afternoon time because we were all able to
2 recharge and ramp back up for the evening session. I think we had four Up Shot drinks around
3 6:00 p.m. and then we were all riding that roller coaster high point until the 10:00 p.m. triple “Down
4 Ride” session. I was asleep no more than an hour after finishing all three “Down Rides” that
5 evening. It is amazing to think about how extreme the ups and downs got during the program. We
6 were all really pushing ourselves beyond whatever we had done and experienced before.

7 Day 3 brought even larger swings between the ups and downs as we all reached the pinnacle
8 of the “high-definition life” Archer talked about and helped us experience. The 4:00 a.m. wake up
9 with six (6) “Up Shot” drinks was like jumping back into a race car mid-race. We took off like we
10 hadn’t had to stop or slow down at all. Just like the day before, there was a 10:00 a.m. “Up Shot”
11 intake time and then a 2:00 p.m. “Down Ride” session. I’ve lost count of the number of drinks we
12 were given on that last day, but I do remember feeling very productive and alive. Whatever
13 problems I was facing in the real world before starting the program had melted away and did not
14 take up one single moment of my life during the program. It was amazing. I did get sick once and
15 felt like my heart was exploding out of my chest a few times, but I’ve been through several exercise
16 programs before and some of the hardest days we put our bodies through can be the most
17 rewarding. So, I pushed on. We finished the day session around 6:00 p.m. with several more Up
18 Shot drinks. The final “Down Ride” session was later that evening, I think, but it all kind of blurs
19 together by that point. I think we were given Down Rides to take home to sleep that night, but I
20 did not have any drinks with me the following morning.

21 To be honest, I completed the program but don’t remember much of the completion
22 celebration or that column-lined area because I was so overwhelmed by the whole experience. It
23 felt like a dream, like I could barely stay awake. I know Blake was in front of me and maybe fell

1 a time or two while walking out of the property. I think I saw Blake get into a vehicle, but I don't
2 remember specifically. I was picked up by a friend who wanted to know about the events so that
3 they could try to get in for the next program. As soon as I got into the car, I fell asleep, and didn't
4 wake up until the next morning when I was home. I believe my body was completely at rest and
5 resetting to maximize life moving forward. There were times when I knew I felt very
6 uncomfortable and not my usual self. But pushing past our self-imposed limitations was the whole
7 point of the program and exercise. The "RC Ride Challenge" pushed me and others to live outside
8 of society's mainstream grind. We rose above the mainstream to achieve more and then dipped
9 under that routine to maximize our rest, recovery, reflection, and resumption of high productivity
10 on the next upswing. It took several days to adjust and get back into the grind of "normal" life, but
11 I would absolutely attend another event hosted by Archer.

12 I heard about the crash and am certainly sad for the loss of life, but I do not agree with
13 trying to hold someone else responsible for the actions of an adult who should have known better.
14 That news article attacking the DeGray family was a real piece of slander and sabotage. The "RC
15 Ride" was challenging certainly, but no one else had any problems. The only problem happened
16 off the DeGray property and well after the program ended. I don't see any connection. I did not
17 have any problems with the event, and I would participate again.

I have given this affidavit on March 15, 2023, of my own free will and certify that my statements are the truth and I have nothing more to say.

Maycin Lochlan

Maycin Lochlan

STATEMENT OF DEMPSEY CARLISLE

1 I am the parent of Blake Carlisle. Blake is an incredible person. Such a heart for others.
2 They were a light of hope for many people and Blake was my world. This dark, dark world that
3 has become a nightmare. For what? Likes, clicks, fame, influence? Was it worth it? Was Blake’s
4 life worth a social media trend? Sorry. I am angry still. So very angry. I don’t know what stage
5 of grief this is, but I’ve had plenty of days of feeling overwhelmed and paralyzed by sorrow. Other
6 times, I wanted to set the world on fire. Since July 2022, I’ve been dealing with grief and I still
7 fail more often than I succeed, but I am trying. My name is Dempsey Carlisle. I’ve never been
8 involved in a lawsuit before. I would never wish this on anyone else. Well, maybe just one person.

9 Blake was born on June 29, 2000 and had just celebrated their twenty-second birthday
10 before going to that horrible self-help seminar hosted by that DeGray degenerate. I didn’t
11 understand the purpose of the event. It did not seem like there was an actual plan for promoting
12 health, but Blake was excited about attending, nonetheless. Blake had been out of our house for
13 several years by that time. I really enjoyed getting to hear Blake’s excitement about something
14 going on in their life. As is common with many young people today, they seem a bit lost in those
15 few years after high school. Even if they are in college or another institute of learning, they are
16 looking for a path to take for their lives. I realized that what looks like a “failure to launch” may
17 just be their process for evaluating and making a big life decision. What I failed to appreciate then,
18 that I understand now, is during that time, young people are highly susceptible to influence. In my
19 opinion, social media is uniquely designed to circumvent parental protections and expose young
20 people to the world. I learned Blake had been following Archer DeGray across multiple social
21 media platforms for years. Unfortunately, I learned how influential Archer was far too late.

1 I was not familiar with social media while Blake was in our family home. I certainly did
2 not keep up with the latest programs or applications. I do not understand what an “influencer” is
3 or how someone can make money from posting things, creating videos, and sharing their life with
4 the world on-line. It’s all artificial, right? It does not actually exist. Yet, I learned that Archer
5 DeGray was a fairly prominent “influencer” in the area. I am not sure if there is a recognized
6 distinction between a self-proclaimed “influencer”, which is what Archer appeared to be, and a
7 “real influencer” who actually generates enough income to sustain their life. My opinion didn’t
8 matter at the time because it was very clear that Blake held Archer in high regard. I wasn’t in a
9 position to argue otherwise. Blake was an adult and made their own decisions...and mistakes.

10 I do remember a conversation where Blake was trying to convince me about how important
11 and influential Archer was at the time. Blake told me about some oil protest in Oklahoma City
12 that Archer arranged several years prior to the 2022 event. I remembered seeing news coverage
13 about an ambulance that was unable to get to the emergency room because of the protest. The
14 patient in the ambulance passed away because of the traffic back up. That protest seemed more
15 like an incredibly selfish, stupid, ignorant, short-sighted, and whatever the exact opposite is of
16 “productive First Amendment speech” stunt to gain attention. I was not sold on DeGray then and
17 am absolutely not interested in buying anything from that family now. Did you know the DeGray
18 family made a large donation to the OU Hospital after that incident? Also, that patient’s family
19 received what was essentially “hush money” to keep the incident quiet.

20 After Blake’s death, I researched the DeGray family and wrote an article to publish my
21 findings. My article is titled: “The Faces of Influence-Good or Evil, Right or Wrong, Love or
22 Hate, Forgiveness or Vengeance. We always have a decision”. I know it’s too long and too
23 cumbersome, but I needed a cathartic activity to process my grief. Researching and writing about

1 the causes of my child's untimely passing was exactly what I needed. The DeGray family has a
2 long-standing relationship with causing harm while preserving and promoting their own interests.

3 Looking back on that oil protest now, I can see how incredibly persuasive and influential
4 someone has to be to get others, who are presumably of sound mind, to walk onto an interstate
5 highway, stop traffic, cause miles of backed-up vehicles, glue themselves to the roadway and force
6 emergency first responders to chisel up parts of the highway just to move them out of harm's way.
7 They put themselves in harm's way and we, the community, suffered. For what purpose exactly?
8 Raise awareness against fossil fuels? In this state? Are you kidding? I bet they increased the local
9 pollution because of all the vehicles they stopped and that sat idling for hours. Those protestors
10 caused more harm than anything they claimed to fight against. Someone literally died because of
11 their disruption and resulting chaos. Yet, that loss of life is just one disgusting fact related to that
12 protest. Archer, the self-declared organizer and leader of that protest, is part of a family that has
13 made tons of money from oil and gas investments around here.

14 Several years prior to that oil protest, the DeGray family purchased thousands of acres of
15 mineral interests across Oklahoma from the Quadstone Energy bankruptcy. Quadstone Energy
16 was a local company that was sued by the citizens of Wheatville after their town was basically
17 destroyed during an earthquake. The citizens claimed the company caused the earthquake and they
18 eventually won. Yet, the company filed bankruptcy, was liquidated to pay creditors and other
19 stakeholders, and the Wheatville citizens ended up receiving very little from the judgment they
20 won. While the DeGray family was not involved in that lawsuit, they certainly benefitted from it.

21 Around the time of Archer's oil protest, the DeGray family had sold or was in the process
22 of selling their mineral interests for significant profits. So, at the exact time a younger member of
23 that family was protesting the oil industry, the older members of the family were making millions

1 of dollars from the exact same industry! Rather than walking through all of the information I now
2 know about Archer and the DeGray family, it would be more efficient at this point to refer to my
3 self-published article. I do want to point out that the degree of hypocrisy within this family is
4 astounding.

5 Please know that my article was part of my process for dealing with grief, anger, pain and
6 emotional swings after losing Blake. I am still a work in progress, but my article was just
7 something I put on-line myself. While it generated some interest and news coverage, it was never
8 picked up or published in full by a major news network. The overarching goal for the article was
9 to initiate action by the community to hold the person responsible for Blake's death accountable.
10 In pursuing this case and publishing that article, I am in no way claiming to be better than the
11 DeGray child. I have my share of failures and mistakes. However, I believe where the individual
12 falls short, the community should be there to pick them back up and continue moving forward. We
13 can be better and can help others together. We can show our kids what is good and right in this
14 world. These principles are the points I wanted to make, and I think I did.

15 Here is what I know about what happened prior to and on July 1, 2022: First, Blake was
16 recruited to attend the event that was hosted by Archer DeGray on the DeGray family property.
17 Second, Blake was paid to attend the event, all of the participants were paid. However, the
18 financial incentives were much higher for participation in and completion of the "RC Ride
19 Challenge". In fact, completing the challenge resulted in a \$5,000 cash payment that was
20 personally handed over by Archer DeGray. There was some kind of porch or column-lined patio
21 on the property where a completion ceremony and a personal meeting with Archer occurred. I
22 know Blake completed the challenge because \$5,000 was found with their body still bound in bank
23 currency straps. I donated those funds after the criminal charges against Archer were resolved

1 behind closed doors- doors I was not allowed to cross. Despite being the surviving parent, I was
2 not informed of the resolution or any meetings to discuss resolution. I need to write another article
3 on the DeGray criminal charges ordeal, but that is for a different day. Suffice it to say, the criminal
4 punishment woefully failed to fit the crimes that killed my child. It's another example of Old-
5 World DeGray influence buying silence. One more skeleton added to the family's closet of sins.

6 Back to this civil case, the "RC Ride Challenge" was some kind of social media trend that
7 Archer DeGray created. Apparently, Archer wanted the trend to "go viral" and become a massive
8 on-line hit so that money, fame, and fortune would follow. Those motivations seem highly
9 suspicious given the DeGray family already has money, fame, and fortune. That family has been
10 swimming in those things for generations. I believe Archer was motivated more by seeking
11 validation, power, authority, influence, and acceptance by the family. I do not know where Archer
12 stands with the family currently and I do not care. What I do know is that whatever the motivations,
13 Archer's decisions and conduct cost my child's life.

14 The DeGray event started on June 29, 2022 and was intended to involve various activities
15 over the course of three days. Through my investigation into the DeGray event, I've learned the
16 "RC Ride Challenge" participants were forced to drink increasing amounts of the "UpShot" and
17 "DownRide" beverages throughout each day. The drinks were provided on an alternating schedule
18 in that the caffeinated beverage was consumed in the morning, some afternoons and early-evening.
19 To counteract the extreme effects of ingesting unsafe amounts of caffeine, the "DownRide"
20 beverage was provided in mid-afternoon and late evening. The alternating beverages resulted in
21 extreme effects of stimulants and depressants. Participants, including Blake, were subjected to
22 higher highs and lower lows and increasingly drastic changes between the two as they consumed
23 more and more of each beverage.

1 By the time the event ended on July 1, 2022, Blake had completed the “RC Ride Challenge”
2 and was trying to leave. Having consumed an unknown number of various drinks with undisclosed
3 contents and being sleep-deprived, Blake was essentially impaired, intoxicated, exhausted and was
4 incapable of independent risk assessment or sound judgment. Blake was not able to make a safe
5 decision because of the conditions and conduct required by Archer. In the moments before leaving,
6 Blake met with Archer to celebrate completing the challenge. Blake received the \$5,000 payment
7 directly from Archer. As I understand the sequence of events, Blake was stumbling to the meeting
8 with Archer and was unable to walk to their vehicle without assistance. Archer had the chance to
9 not return Blake’s car keys, to not let Blake leave, to call a taxi or make any number of alternative
10 transportation arrangements and, by doing so, to save Blake’s life. Instead, Archer encouraged
11 Blake to record the departure from the event on their phone and to then post the video on-line to
12 celebrate with the world.

13 Archer knew what was in “UpShot” and “DownRide”, Blake did not. Archer should
14 confirm the presence of alcohol in DownRide. At no time was Blake aware of the presence of
15 alcohol. Archer knew the risks of participation in the “RC Ride Challenge”, Blake was not given
16 any warnings or disclosures. Archer was not subjected to the extremes caused by alternating
17 consumption of stimulants and depressants. Blake had been tortured by the time the event ended.
18 At all times and at the final critical moment, Archer was in a position to save Blake’s life. Archer
19 not only failed to act, but they encouraged dangerous conduct.

I have given this statement of my own free will on March 13, 2023 and certify that my statements are the truth and I have nothing more to say.

Dempsey Carlisle

Dempsey Carlisle

STATEMENT OF ARCHER DEGRAY

1 This case is ridiculous and simply a publicity stunt for that family to try and shift blame off
2 of Blake onto a highly visible and famous person-Me. Celebrities are always being targeted with
3 frivolous claims and lawsuits and this whole charade just confirms how popular and widespread I
4 am recognized. I am the target here. Look, ladies and gentlemen-you know me or should know
5 me. I did not do anything wrong and certainly did nothing to cause death. Life is precious and
6 should be preserved at all costs and opportunities. We only get one life to live, and you should let
7 nothing hold you back from living your best life. Do it for the plot! AEOM is one motto I live by-
8 All Eyes On Me. Every one of us experiences ups and downs at times and we must persevere
9 through this rollercoaster called life. Speaking of this ride, have I mentioned my HD Life
10 supplements- “UpShot” and “Down Ride”?

11 You’ve heard of them, but they are a vitamin-based beverage set that turns any mundane
12 day into a high-definition experience where you not only handle the ups and downs of life, but you
13 maximize the ride each day. You get to really “carpe” the heck out of each “diem”! Sorry, in
14 English that’s-you really “seize the” heck out of each “day”! Tomorrow is not guaranteed, the rest
15 of today isn’t either. The only guaranteed moment in life is this one right now. Maybe you get
16 the next one, maybe not. My program involves a two-drink package that helps people maximize
17 life and provides significant health benefits. I have to say my statements and drinks are not “FDA
18 approved”, these are just my opinions from personal experience and the benefits seen by many,
19 many followers, I mean my friends.

20 These drinks were designed and created by me to give you real high-definition life and can be
21 used to counteract or increase the ups and downs of life depending on what you need that day. Need
22 to prepare for a big test or meeting? Up Shot is the answer for your productive time. Then when you

1 need to slow down and rest, switch to Down Ride. Down Ride really maximizes your downtime and
2 helps you get the most out of your body's natural rest and recovery process. When it's time to gear up
3 and get going, back to Up Shot. This dual approach sets my program apart from every other drink or
4 vitamin-based diet out there. You control what your body does. You decide when to step on the gas
5 and when to use the brake to rest. No one else gets to tell you what to do and when to do it, not even
6 your body. Take control of yourself and maximize your life.

7 Sorry, but I can't tell you all of the contents for Up Shot and Down Ride. They are proprietary
8 blends that I created and have personally tested and verified. The "RC Ride Challenge" was part of
9 my product testing phase and I'm very excited to announce that we will resume production and
10 distribution once this little legal matter goes away. Generally, "UpShot" is used when you want your
11 body to accelerate and get up and running. Up Shot really boosts life in all the right ways. It includes
12 vitamins, B12 mainly, protein, and several forms of caffeine. Caffeine isn't illegal right? Almost every
13 person over the age of 14 in this country consumes caffeine in some form. My drinks are natural and
14 not fake. The worst are those artificial "lab-created" stimulant drinks like RojoToro, Boom, and the
15 others. While I use a few of the same ingredients, I can at least pronounce all of them and my mixtures
16 do not look like math equations when you read them. Up Shot is best considered a vitamin-based
17 proffee drink. It combines vitamins, protein and coffee- its "Proffee", the next evolution of coffee. I
18 considered calling it "Fire Cider", because of the spices, but I didn't want people to think there was
19 something harmful in the drink- like fire!

20 The counterpart to Up Shot, is "Down Ride", formerly "ReSet". This one helps people relax
21 and push the noisy world just beyond their awareness. It allows you to truly focus on whatever is
22 directly in front of you. Like Up Shot, Down Ride contains a proprietary blend of vitamins and
23 ingredients that helps people step back from the chaotic surroundings of this world. People get to pause
24 the world, reset their minds and bodies, and get better prepared for the onslaught that is regular life.

1 People are being constantly attacked by this world- jobs, bills, mortgages, family demands, social
2 demands, debt, fear, worry, and involuntary participation in modern society's economic-derived
3 separation of the haves and have nots. When you are constantly running on a treadmill that someone
4 else controls, you never get the chance to step off and see if you should be or want to be running after
5 nothing. I offer consumers an experience to show them how resilient they are and how they can push
6 past limitations that the world has put on them. This one consists of natural, homeopathic ingredients
7 that promote rest and focus on recovery. Most of the ingredients can be found on the shelves of your
8 local grocery store or pharmacy. The critical, and most protected, component comes from an old recipe
9 that my great, great, great, something, grandparents used. It was legendary around north Mississippi
10 in the mid-19th century. My family's roots in this country go back to the pre-Revolutionary War time
11 period.

12 In the mid-1800s, my ancestors purchased a small cotton operation in northwest Mississippi.
13 Before anyone gets upset about my heritage, as far as I know, my family was not involved in any forced
14 labor- our operation was closer to indentured servitude, at worst. My family worked on the land
15 personally and used hired help as operations expanded. They did not participate in the buying, selling,
16 or trading of people. The land was shared between the families who lived on and worked on the land.
17 As I understand it, the farm was successful, and they developed diversified streams of income. One of
18 which was the creation of a drink: DeGray Light. DeGray Light was never labeled as such, and I've
19 heard stories about how protective the family was about the location and process for creating the drink-
20 I'm not sure why but I guess marketing was not as necessary to promote a product as it is now.

21 In simple terms, the DeGray Light component for Down Ride involves heating water
22 almost to the boiling point, mixing in a blend of ingredients, then cooling the mix down. The mix
23 is sealed after reaching room temperature. The batch is stored for several days and then opened to
24 siphon off the top liquid. Then, the mixture is strained to pull out additional moisture. Essentially,

1 we then re-heat the mixture and collect the condensation that is expelled out of the top of the
2 container. The first few collections are tossed as an “offering”, the angel’s share I believe, but the
3 rest is mixed directly into Down Ride. Obviously, I can’t disclose exactly what the mix is made
4 of, and the actual process is more complex, but I want to emphasize that I make this component
5 and my family has made versions of it for generations. I’ve tried it many times and it has always
6 helped me slow down and focus on resting. In fact, some of the best sleep I get is after having a
7 few drinks from the original recipe. Since the creation has helped our family and me personally, I
8 wanted to share it as part of my whole-health HD life program. I come from a long line of
9 entrepreneurs and I’m just trying to make my mark on this world.

10 Around 1900, my family’s business expanded throughout the Mississippi Delta area. Then,
11 disaster struck that beautiful corner of this county when the Great Mississippi Flood inundated a
12 huge area of the Delta. Unprecedented rains throughout the upper Midwest caused the Mississippi
13 River to crest downstream, exceed flood stage, break over the levees in place at the time, and flood
14 over 27,000 square miles of land. Just for comparison, 27 thousand square miles is about one-third
15 of the entire state of Oklahoma. By sheer luck, our family had started selling off land and property
16 a few years before the 1927 Flood. Apparently, some unique family organizations back east needed
17 to make very large investments and move a bunch of money around some. So, my family was able
18 to essentially cash out their holdings at the perfect time and have enough assets to move and
19 establish their legacy elsewhere.

20 As Oklahoma history aficionados may recall, the discovery of oil had recently occurred in
21 this area and our family moved out here to jump in on the development of commercial oil
22 production. An entire industry was being built from the ground up. This was a real land of
23 opportunity. My great- great- grandparents settled in east central Oklahoma, half-way between

1 Oklahoma City and Tulsa. I don't need to cover much more of my family's history because I am
2 well-aware that the Plaintiff in this case made sure to publish an article trying to sway public
3 opinion and cast me as some notoriety-hungry, desperate-for-attention, social media snake oil
4 salesperson. I am not selling snake oil; I don't even know what that is. I am sharing what has
5 worked for me and helped me develop an influential life where I seek to better others. I worked to
6 get here, just like my ancestors did. So, what if my family has wealth? They worked for it, earned
7 it, wisely managed it and used it to provide for themselves and others. The DeGray family story
8 is amazing, I'm doing my part and playing my role better than anyone else ever could. I live life
9 just like those before me, only now it has to be "Me before Us before Others".

10 This whole lawsuit is just a pathetic attempt to extract money from us. I didn't kill Blake,
11 I wasn't driving the car, I wasn't even in the car, I did not force Blake to do anything and certainly
12 not to drive their vehicle while tired or unfit to drive. I did meet with Blake at the end of the event
13 on the evening of July 1, 2022. There is a column encircled spot where I meet with each participant
14 to discuss their experience and congratulate them. The event guests stay in the guest house on our
15 property, and they are free to use the grounds in that area throughout the event. I've provided some
16 pictures of the guest house and property for this case. The area in front of the guest house is a
17 patio, usually vehicles are not there, but we had a groundkeeper working on the Fourth of July
18 decorations for the building at the time of that one picture.

19 That evening, at the end of the June 29-July 1st program, Blake seemed okay before leaving
20 and was very adamant about finishing the celebration by recording their personal experience and
21 sharing it with the world. It is an exciting time. Some participants seem overwhelmed by the
22 experience and every celebration is different. At that time, I do provide them with a bonus for
23 completing the program and give them the means to step into a new and better life. Blake received

1 the same as every other person who completed the program- something like \$5,000 or so. It's not
2 much but should be enough to help those who are strong enough to complete the program shift
3 their reality toward new goals and a better life. Also, Blake almost fought me to get their car keys
4 back and take off to enter that new life. It's absolutely not on me that Blake got carried away while
5 driving later that evening. In fact, I had to hold Blake up while returning their car keys. I wasn't
6 even sure what Blake was saying at that time because their words were jumbled and not making
7 sense. I figured they were really excited and just ready to go. Again though, everyone's experience
8 is different and no one else had any issues. We've had people run off the property because they
9 were so excited to get going and make changes to make it better. You can't understand how life-
10 changing this is without going through the program.

11 This whole lawsuit farce looks like the same type of money-grab that those people in
12 Wheatville tried against that oil company years ago. They literally blamed oil production for an
13 earthquake! How ridiculous is that? I know they won, and the company was found liable for
14 millions of dollars, but what actually happened after that? Did those people receive anything? The
15 company filed for bankruptcy, the assets were auctioned off to pay secured creditors first, and only
16 the largest claimants received something-pennies basically. Right? Did that work for them? Nope.
17 This lawsuit shouldn't work either.

18 I think Plaintiff is ticked off that our family happened to be in the area and in a position with
19 enough money to purchase a lot of mineral interests from that company. We sold those later and ended
20 up making more from that investment than those citizens got from that stupid lawsuit. Why is that seen
21 as a "bad thing"? We did nothing illegal. We bought something of value when it was priced low and
22 eventually sold it when the price rose again. What were we supposed to do? Not try to make money?
23 Not make sound investments to provide for our family? Every single person in this community does
24 the exact same thing-we are all working to provide for ours. The only difference is the scale of the

1 work. Also, that one-sided slanted “hit-piece” article sure skipped over the part where my family has
2 made multiple large donations throughout the area to help improve the community. The Winchester
3 library has a plaque memorializing the DeGray family’s significant contribution to the Winchester
4 community.

5 I’m sorry that this world isn’t absolutely fair and equal for all people. Actually, I take that
6 back, I’m not sorry for that. That’s not my fault nor my family’s fault. I did nothing wrong here. I
7 hate how my social media information is being used and twisted to fit some narrative that I am selfish.
8 I’ve seen the pictures and quotes that someone pulled from my accounts. I can confirm that those are
9 my pictures and words, but I was always trying to help others. I am not the selfish person those items
10 seem to indicate, especially when they are taken out of context.

11 I did not hurt Blake and I certainly did not cause Blake’s death. Blake decided to participate
12 and received the agreed compensation. No one else from that event ended up dead. No one else was
13 even hurt. I am sorry that there was a car wreck, and that Blake was hurt, but that is on Blake- the
14 person behind the wheel, not me. The RC Ride event is a self-healing, self-exploration, self-promotion
15 environment where dozens of people, so far, have had a true high-definition life experience. We help
16 people push past their boundaries to find where they can perform better and maximize their lives. Also,
17 car crashes happen all the time and just because Blake left my event and had a crash, does not make
18 me liable. Look, I have places to be and people to see. I’ve defended myself enough from online
19 attacks. I never thought someone could manipulate the judicial system into whatever this is now. I’m
20 not responsible for the conduct of a grown adult who got into a car wreck. Stuff happens. It was an
21 accident. I’m done with this.

I have given this affidavit on March 17, 2023, of my own free will and certify that my statements are the truth and I have nothing more to say.

Archer DeGray

Archer DeGray

STATEMENT OF ROUX COLLINS

1 It's pronounced "Rue", not "rocks" or "rux", the "x" is silent. It's French or something. My
2 name is "Rue" Collins. My family came to Oklahoma from Colorado several decades ago. Boulder
3 area specifically. I am no social media expert, but I do have several profiles across multiple programs.
4 It's amazing how these handheld devices we all have contain more computing power than what NASA
5 had to send people to the moon! How do we humans, as the advanced species on this planet, use such
6 powerful devices? Do we share good ideas and spread general information to improve the common
7 experience of life? Eh, kind of, sometimes and maybe. Mostly, we play games, watch videos and
8 "interact" with our fellow species artificially.

9 We are almost technologically advanced enough to live our daily lives without having to
10 interact with another person. Need to wake up or go to sleep at a certain time? Set an alarm. Need to
11 eat? Order food through an app. Need groceries or supplies? Order online and request delivery. Thanks
12 to that one huge company we can order anything we could ever need or want from anywhere in the
13 world and have it delivered to our front door. At least, Prime members can do that. Need to pay bills-
14 use the online "portal" or whatever that company calls the customer pay page. I think most people
15 even get paid online through direct deposit into your bank account. Anyway, these personal devices
16 aren't just for making calls anymore, they are the screen to the world. The world is literally at our
17 fingertips. Well, the artificial world. It's no wonder how influential these devices have become. What
18 would you prefer to lose, your wallet/purse or your phone? I bet most people now would choose to
19 keep their phone-I would. If you lost your wallet/purse, just call the bank, freeze your cards, get an
20 appointment to get a replacement driver's license and boom-all is good. Sorry to get sidetracked. I
21 just wanted to emphasize the value we place on these things that connect us to each other and the world.

22 With the rise in value of personal devices and capacity for direct personal influence through
23 those devices, the "value" of personal profiles and online presence has also taken off. I'm certain you

1 are aware of social media “influencers”? These are real people, most of the time, that have enough
2 followers or subscribers to affect the purchasing or consumption decisions of others because of their
3 authority, knowledge, position, or relationship with an audience. Sometimes the influence is real,
4 sometimes it is not. These people (or bots in some cases) are essentially marketing tools, that also have
5 social relationships with brands or products, and they can generate income from building, cultivating,
6 growing, and maintaining social connections. We do not see “spokespeople” online, rather we see
7 influencers who perform the modern version of that same function. They are living, breathing, and
8 interactive advertisements for something-often times they are advertising their own products. Such is
9 the case with Archer DeGray.

10 Archer is a local Oklahoman who had some good content years ago but has clearly become
11 very desperate for bigger and better things. More wealth, more influence, more whatever-it is all just
12 different attempts to find meaning for their life. Too many people equate popularity or “going viral”
13 with living a meaningful life. The whole “RC Ride” thing was just the latest attempt to fill some hole
14 in Archer’s soul. This was an attempt to create a viral trend that was going to catapult Archer into
15 world-wide fame, wealth and onto a path of easy living. This “RC Ride” challenge, event, seminar,
16 whatever it’s called, was absolutely a reaction to the last “viral” moment of Archer’s online career: the
17 “No to Fossil Fuels” protest in 2019.

18 I don’t care to provide all of the details, but Archer organized and rallied support for a “No to
19 Fossil Fuels” protest where people literally glued themselves across I-40 near Oklahoma City. Archer
20 was present and convinced several people to “stick it to the oil industry” by sticking themselves to a
21 highway and stopping traffic for a while. I’m still shocked that no one died in the protest-at least none
22 of the “protestors” died. Because of the traffic issues and back up that was caused by Archer’s protest,
23 an ambulance was unable to make it to the emergency room at OU’s trauma center and the patient died
24 while in route. I do not know the details, but apparently the DeGray family made some large “donation”

1 to OU and to the patient’s family so that the matter did not end up in a lawsuit or in the public eye for
2 very long. That fiasco certainly showed how much influence some have over others because I am hard-
3 pressed to come up with a stupider plan than gluing oneself to a highway. Yet, Archer got a few dozen
4 participants to show up and several went through with gluing themselves to the highway! Archer is
5 very charismatic and undoubtedly an influential personality. Even though Archer did not glue their
6 own hand to the road, they did provide the glue and incentive for participation. Don’t kid yourself, the
7 people were paid to show up and they got paid more to go all the way through with the stunt. That is
8 a common element to Archer’s approach-payment for participation.

9 In my opinion, the stupidity or blind loyalty of these “followers” is astounding. I will never
10 dispute that the lure of money and perceived closeness to a social media influencer can be strong
11 enough to overwhelm better judgment. Also, Archer’s ideas do not always read the intended audience
12 correctly. After all, the “No to Fossil Fuels” protest was in the middle of a state where oil and gas
13 production are one of the largest, if not the largest, industries in the state. Protesting oil and gas in a
14 state where the economy swings up and down with the price of oil shows the clear disconnect between
15 Archer and the causes they seek to promote.

16 Also, around the time of that protest, I think the DeGray family had recently purchased and
17 flipped several thousand acres of mineral interests in Oklahoma to generate tons of money for the
18 family. I’ve heard that Archer’s protest resulted in some severe “behind-closed-doors” punishments
19 and repercussions from the family. It’s not a good look for the “old money” generation in a family to
20 generate millions of dollars while a member of the “new money” contingent protests against the exact
21 investments that were so financially beneficial. I guess the family’s new trust fund generation may not
22 get all of the financial independence of their ancestors.

23 It’s hard for me to feel sorry for “new money” people whose families have created a silver
24 spoon opportunity that may go unutilized. So, Archer DeGray really ticked off the family with that

1 stunt and Archer has been looking for a way to generate their own income either to truly be independent
2 or, I suspect, to get back in the “good graces” of the “old money” decision makers of the DeGray
3 family.

4 All of that brings us to the “RC Ride Challenge”. I heard about it; I was even in on some
5 of the early discussions on creating it. I used to be friends with Archer, but things turned bad
6 because I did not play along with Archer’s skewed view of the world. The “self-help”, self-healing,
7 “expand your limits” spin on this is nonsense. It’s marketing gloss. It’s just the cover story for a
8 dangerous and deadly prank. What do you think really goes “viral” on social media-good,
9 productive, helpful tips and advice? Or stunts where people do stupid things and sometimes get
10 hurt? Unfortunately, it’s the latter. The “RC Ride Challenge” was originally created to be described
11 as exactly what it is- people take stimulants and then depressants and they alternate those over a
12 several day period to see what happens. There was nothing redeeming about it. We wanted to see
13 if people would actually participate and go through with it. I refused to stay and help and fell out
14 of favor. Archer cut ties with me, and I’ve been out of the loop. However, as soon as I became
15 aware of the “RC Ride” challenge, I absolutely recognized the core elements of the original plan.

16 Prolonged exposure to caffeine and other stimulants will certainly give consumers the sensation
17 of “alertness” and “productivity”. The more one takes, the more alert they may feel. However, there
18 is absolutely a tipping point where this activity becomes dangerous. That risk of danger is increased
19 where participants are also being given doses of over-the-counter depressants. Think of sleep pills,
20 chamomile teas, or other “restorative” sleep aids, does the marketing for those products sound awfully
21 familiar to the “restorative” attributes of the “RC Ride” challenge? “Get the best sleep of your life”,
22 “Boost your body’s recovery”, etc. Pretty familiar right? Everyone realizes that “RC” stands for roller
23 coaster, right? What happens on a roller coaster? Ups and downs. Highs and lows. Excitement and a
24 degree of panic and that cycle continues until the ride is over.

1 I knew too much to ever be tempted into attending the June 29-July 1, 2022, challenge,
2 event, seminar, or whatever it's called because I knew what was going to happen. The "RC Ride"
3 challenge actually causes significant harm to some participants who become incapable of
4 independent cognitive function. Followers become sleep deprived, impaired, essentially
5 intoxicated, and unable to discern between safe and dangerous conduct. This mentally deficient
6 state is due directly to the extreme swings between stimulants and depressants. That pattern of
7 alternating between the extremes of wakefulness and rest, from consuming external artificial
8 sources of foreign substances, could kill someone. In this situation, that trend actually did.

9 That event was dangerous, and no one should ever do anything like that. Archer isn't a
10 doctor or physician of any discipline. No one involved in the program has any medical training or
11 expertise. I am actually surprised that Blake Carlisle was the only one hurt. Although, I bet other
12 participants were experiencing the harmful effects on their body from the alternative intake of
13 stimulants and depressants. If others would honestly share their experiences, I bet there would be
14 evidence of harmful effects. I bet I could recognize most of the contents of those drinks, lots of
15 caffeine and sugar in the "UpShot" one and a bunch of over-the-counter sedatives in the other one.
16 Am I right?

17 Also, there is no doubt in my mind that the contents of those drinks were hidden from the
18 participants. You know how I know? Has Archer ever disclosed what the "family recipe" really
19 is? It's the core component of "Down Ride" or "ReSet" or whatever the name ended up being. I
20 heard the Dempsey family had an autopsy done on Blake. I'll bet my next few paychecks that
21 there was evidence of alcohol or alcohol-like markers found; am I right? Anyone who is familiar
22 with the origins of stock car racing or the income sources for early 1900's crime families would
23 recognize some of the process and materials involved in that old DeGray family recipe. The

1 sedating effects of “Down Ride” come from ingredients and substances that we all recognize and
2 know about. Even those who have never tasted the drink, know of it.

3 I am not a chemistry expert and I have no formal medical training, but it is generally
4 accepted knowledge that drinking too much caffeine can cause problems. Likewise, consuming
5 too many sleep aids, even over the counter ones, can cause harm. Worse still, combining those
6 extreme behaviors into a multi-day event would certainly cause significant harm to the participants
7 as well as a risk of harm to others in the area of the event. Then, to let someone drive away and
8 actually encourage them to continue engaging in dangerous conduct by paying them to record
9 themselves as they “celebrate”, is a level of depravity and evil that even I did not anticipate from
10 Archer. Blake Carlisle was in no condition to drive or really do anything independently.

11 I’ve heard Blake was barely able to walk out of the guesthouse on the DeGray property.
12 Some may ask, well who could have known that something bad was going to happen that night?
13 Archer did. I have no doubt about that. My conscience will not allow me to rest until Archer is
14 held accountable for what happened. The DeGray family has huge influence around here. The
15 fact that there were criminal charges filed, but resolved through a plea deal with just community
16 service is nothing more than confirmation of the exaggerated influence of the DeGray family.

I have given this affidavit on April 11, 2023, of my own free will and certify that my statements are the truth and I have nothing more to say.

Roux Collins

Roux “Rue” Collins

STATEMENT OF PALMER ECHOLS

1 I am Palmer Echols, retained professional expert witness for Plaintiff Dempsey Carlisle. I
2 have been retained in the civil case Carlisle v. Archer DeGray at the request of the Plaintiff. I
3 offered and applied my expertise to an investigation, analysis, assessment and rendering of
4 professional opinions accordingly. My background, degrees, academic work and professional
5 activities are listed in the initial sections of my report attached as an Exhibit in this case. I would
6 refer further background questions to that document.

7 First, all stakeholders in this case agree Blake Carlisle died as the result of multiple blunt
8 force trauma and associated injuries, both external and internal, sustained in the motor vehicle
9 accident the evening of July 1, 2022. The Carlisle vehicle drifted off the roadway and crashed into
10 an overpass embankment. The crash happened in the evening, so it was certainly dark, but the
11 weather was fine, the roadway was clear and there were no environmental contributing factors. No
12 other vehicles were involved, and no witnesses were present. The cause of the crash seems only to
13 be whatever was going on with the driver- Blake. While there is a small argument over the exact
14 time of death, the cause of death is undisputed. The unanswered questions are determining what
15 sequence of events led directly to and caused the fatal accident involved in this case.

16 Second, in my professional opinion, Blake was influenced by Defendant Archer DeGray in
17 such a way and to such a degree that Blake was unable to independently exercise sound cognitive
18 decision-making and did not know what they were doing in the hours preceding the vehicle crash.
19 The impairment to Blake was the result of many factors. Most significantly, the consumption of
20 impairing substances, including alcohol, was a direct cause of limited cognitive functioning. The
21 alternating ingestion of stimulants and depressants over a prolonged time period was very
22 detrimental to the persons who were participating in the “RC Ride Challenge.” Also, I believe the

1 participants were sleep deprived based on the schedule of substances consumed during the
2 challenge.

3 As I understand the schedule, on June 29th, Day One, the RC Ride Challenge involved
4 drinking a single UpShot, stimulant, at 6:00 p.m. and then a DownRide drink several hours later.
5 The Day Two schedule was very taxing on the participants. I believe there would have been initial
6 signs of impairment by midday. On June 30, 2022, participants were given two drinks of UpShot
7 around 4:00 a.m. with four additional UpShot drinks at 10:00 a.m. The amount of caffeine present
8 in these series of beverages would have caused physical discomfort and possible chest pains.
9 Around 2:00 p.m., the people still participating were given three (3) DownRide drinks-which would
10 have rendered most of them very sedated or pseudo-unconscious. The participants would have been
11 showing signs of impairment- difficulty focusing, difficulty speaking, and unsteady movements. At
12 6:00 p.m., four (4) UpShot drinks were provided and four (4) DownRide drinks followed around
13 10:00 p.m. At this point in the “challenge” there should have been serious concerns over the health
14 of the participants.

15 On Day Three, the extremes and swings between were even greater. At 4:00 a.m. on July
16 1, 2022, six (6) UpShot beverages were provided to each person. Six doses of the ingredients in a
17 single beverage would have resulted in vomiting and multiple signs of physical sickness. Sweating,
18 sporadic pulse rates, heart palpitations, chest pains, stomach aches, and many other indicators of
19 illness would have been present and observable. Another four (4) UpShot drinks were provided at
20 10:00 a.m. and four (4) DownRide drinks at 2:00 p.m. All participants should have been displaying
21 signs of intoxication at this time- slurring speech, unsteadiness, if they were able to stand at all,
22 unbalanced movement, dizziness, memory failures, and other indicators of cognitive impairment.

23 Incredibly, the “RC Ride Challenge” continued the evening on July 1, 2022. Six (6) additional
24 drinks of UpShot were provided to each participant around 6:00 p.m. I am surprised there were not

1 multiple heart attacks on the property by this time. The final part of the challenge was the consumption
2 of six (6) DownRide drinks around 8:00 to 10:00 p.m. Tragically, the evidence indicates Decedent
3 Blake Carlisle completed this challenge and received the final payment from Archer DeGray. Blake was
4 able to obtain the keys to their vehicle. Allegedly Blake Stumbled to the car, got in and was able to
5 drive off the DeGray property. Given the substances consumed over the preceding fifty-two (52) hours,
6 I suspect Blake would have needed significant help moving to and into the vehicle. Approximately one
7 (1) hour after completing the “RC Ride Challenge”, Blake Carlisle was involved in a single-vehicle
8 accident resulting in fatal injuries.

9 To a reasonable degree of medical certainty, Blake Carlisle was unable to safely operate a motor
10 vehicle because of intoxication-like cognitive impairments caused by the unknowing ingestion of
11 stimulants and depressants, including alcohol, over a prolonged time period of several days. Blake’s
12 cognitive functioning was limited, and they would have been unable to make independent decisions the
13 day of the vehicle crash on July 1, 2022. Furthermore, Blake was susceptible to influence, including
14 financial compensation, such that they were unable to make prudent and rational decisions. People who
15 are impaired are unable to exercise independent judgment and can be easily influenced. I believe the
16 “RC Ride Challenge” participants became increasingly affected by the influence of Archer DeGray as
17 the event progressed and the impairing substances were consumed in greater quantities. Young people
18 are susceptible to influence also. My report includes specific information on the influence of Archer
19 DeGray and their behavior and motivation complex. Tragically, Blake was in such an impaired state of
20 mind, that they were talked into dangerous conduct of operating a motor vehicle. It is my professional
21 opinion that Blake Carlisle died because of the conduct of Archer DeGray.

I have given this statement on June 21st, 2023, of my own free will and certify that my statements are the truth. I reserve the right to supplement this statement as discovery continues and additional information is obtained. I further certify that my report was prepared and issued to the Parties in this case on June 14th, 2023.

Palmer Echols

Palmer Echols

STATEMENT OF DALLAS EXETER

1 Morning. Let me guess...Palmer says Blake's death was caused from an impaired,
2 "intoxicated-like" state of consciousness, brought on from prolonged ingestion of alcohol and sleep
3 deprivation? Is that right? I could have given that unfounded opinion without charging the family
4 thousands and thousands of dollars. However, an opinion from a well-paid, highly educated,
5 professional victim-focused witness, does not make it correct simply because Palmer says so. The
6 Carlisle family has been through the loss of a child in a tragic accident. But this case involves just
7 that- an accident. This is not an intentional wrong or crime committed with malice and evil intent.
8 This wreck was not even put in motion by the Defendant. Archer was not present when Blake
9 decided to operate the vehicle and Archer was certainly not there when the vehicle left the roadway
10 and crashed. I understand the opposing position of "Well Defendant put Blake in that position and
11 in that condition such that the crash was inevitable", but the science simply refutes that assertion.

12 Archer DeGray did not unduly influence Blake Carlisle into any conduct or action. Blake
13 Carlisle was an adult, of sound-mind, possessing independent decision-making faculties, and in all
14 other ways appeared to be a mature individual without any impaired cognitive functioning. The
15 presence of compensation for participants did not result in an unbalanced relationship or one where
16 undue influence was present. People are routinely compensated for participation in various
17 seminars, studies, tests, etc. and the results are not compromised because of the financial incentive.
18 I do not believe the financial component was enough, separately or jointly, to overwhelm Blake's
19 cognitive faculties. Also, the amount of alcohol in the DownRide beverage was not sufficient to
20 have any cognitive effect. I have some formal education in toxicology, and I've assessed the testing
21 done in this case. Even taking the potential for cumulative effects, in my opinion and assessment
22 of the substance testing results, alcohol was not a factor in any impairment or mental limitation.

1 I agree to a reasonable degree of medical certainty, Blake Carlisle was unable to safely
2 operate a motor vehicle. Clearly, they were involved in a tragic accident. However, I disagree that
3 the cause for the accident had anything to do with Archer DeGray. Any “intoxication-like”
4 consciousness issues were not present between the time Decedent left the DeGray property and
5 drove their vehicle for nearly an hour without problems. The consumption of stimulants and
6 depressants, alcohol was barely present, if at all, over several days would not result in any
7 impairment. Also, there is no evidence Decedent was susceptible to influence, even financial
8 compensation, such that they were unable to make prudent and rational decisions.

9 None of the other participants in the June-July 2022 event sustained any harm or alleged
10 they were improperly pushed or persuaded into any action or conduct. The rest and recovery times
11 were sufficient for all other participants to engage in the challenge, complete the challenge, and
12 return to their lives without incident. The only issue comes from the family of the person who was
13 involved in a car accident, nearly one hour after leaving the event location. My report includes
14 additional information on Archer DeGray and I request to incorporate my report here. Tragically,
15 Blake made the decision to operate a motor vehicle in a way where something went wrong, and an
16 accident resulted. It is my professional opinion that Blake Carlisle died without any causal conduct
17 of Archer DeGray.

I have given this statement on July 7, 2023, of my own free will and certify that my statements are the truth. I further certify that my report was prepared and issued to the Parties in this case on June 21st, 2023.

Dallas Exeter

Dallas Exeter

EXHIBIT 1

Selected Social Media Images/Quotes from Archer DeGray:

2018-2020

Profile Picture:



Profile Quote: *“The best view is from the top. Join me here.”*

Posts/Original Statements (text only):

- 2018 (January through May)
 - Your success is within your reach. Message me for tips.
 - I can guarantee a better life, Carpe Diem!
 - Do It for the Plot!
 - Don't copy idols exactly; emulate their path and exceed expectations.
 - Life isn't as hard as some want you to believe. It's a series of decisions with outcomes you can influence or control.
 - Learn from other's mistakes. I've made plenty on the way up, but you must seize each day you are given- Carpe Diem!
 - *10,000 followers!!! Thank you everyone and I will continue leading with every breath and every fiber in my body. I will lead us to that better life.*
 - This view is worth the hike. You can see the farthest from the top of the mountain. Join me. Use my path to the top!

- 2018 (June)
 - Stand up and stand out. Find a cause and stand for it. Be vocal, do not be silenced, shout if you must.
 - We must stop destroying the planet. Would you want your remains to be used as fuel for a car in the future? No, we must stop oil as a fossil fuel!
 - I can change the world. Join me and help. Take up arms against evil, unite to save the world.

- Are we not right to unite and stand for what is right? Doesn't that mean we must stand against what is wrong?
- Oil companies haul millions of barrels of oil across Oklahoma roads. I will stand to stop them. Stand with me. Join my cause, let me lead while others follow.
- I'm sending out an invitation to my followers for an event to unite us in the near future and to stand against evil.
- ***uNited yOu and me musT stand tOgether against evil, in all fOrms, In aLl places, at all times. July 6th is our D-Day.***

2018 (July 1-6th) Profile Picture:



Profile Quote: "Do It for the Plot!"

- 2018 (July 1st through 6th)
 - Bring your construction orange, high-visibility clothes, and gloves! We must have gloves for the work ahead.
 - This Thursday is our Demonstration Day. We will be forever united, lives glued together for the greater good. I'll bring the glue, you just need to bring you.
 - ***Remember: uNited yOu and me must stand tOgether against evil, in all fOrms, In aLl places, at all times.***
 - **D-Day countdown is at one. Final preparations are underway. Stand United. You bring You, I'll bring our glue. Designated collection points 1 and 2.**
 - **D-Day is here. We'll be loud, bright, and clear. We'll stand united. We'll make them know our message.**
- 2018 (July 7)
 - **I made the news! Thank you, followers!! 12,000 going strong. The cause was covered=Mission Accomplished.**

- **Did you all see the full effects of my work? Miles of captive audience members, following me, listening to me, learning about what I was there for. I could do it and we did it.**
- *The mission is not lost. We regroup and move to a new target and objective.*

2020-2021

Profile Picture:



Profile Quote: *“Stay the Course!! AEOM!”*

Posts/Original Statements- text only:

- 2020
 - What’s the meaning of life? To carpe diem and squeeze every drop out of the limited number of days you have. Pandemic or panic-let nothing stand in your way!
 - Take control, you chart your course, you are the Captain, don’t let others chart your path.
 - Seize the day, steal the sun, assert yourself and have peace each night.
 - Not everyone gets to be the lion. If you are a sheep, be the sheep that leads.
- 2021
 - Do It for the Plot-you are the main character of the story that is your life. Each and every moment, good or bad, is just a plot point for your larger narrative. You are the writer, producer, director and star of your life. Start living unapologetically and give them a plot twist that no one saw coming.
 - Maximize life- both the ups and downs.
 - I’ve developed a method to maximize life. Details coming soon. Stay tuned.
 - Working on a program to help people live better lives. Publication schedule to be determined.

Profile Picture:



Profile Quote: *“SOME PEOPLE LIVE TO TEAR OTHERS DOWN. NO MATTER WHAT THOUGH, AEOM! RISE LIKE A PHOENIX!”*

Posts/Original Statements- text only:

- 2022
 - **Do you ever feel like you need a boost in the morning or late afternoon? Ever feel like you need help falling asleep or resting? Contact me for information on a new revolutionary program to help you maximize life.**
 - I used to be frustrated by the demands and chaos of the world. I am better now. I've pushed passed the boundaries the world placed on me, and I know I can accomplish so much more than what I am told my place is in the world. All Eyes on Me!! Want to live that way?
 - **Invite only DeGray event June 29-July 1, 2022. Come have an experience and maximize your life. Push past self-imposed or world-imposed limitations on your performance in life. Discover how powerful your mind and body really**

are. Learn how to build rapport, exercise influence, and affect the outcomes of your daily life.

- **Guaranteed- A life changing experience. June 29-July 1st. All-inclusive wellness program. Contact me for information.**
- **Need some extra funds? Want the freedom to change your life? To pause the daily grind, step back for a moment to assess your direction and make an active choice for moving forward. Contact me for details. Remember AEOM! Live it.**
- Next week is the DeGray health and wellness program. Invitations have been sent and we are fully booked and confirmed. I will contact any waitlist followers if a spot opens but stay tuned for additional programs.
- June 29, 2022: Day One complete- Participants welcomed and we already had great sessions. Several followers have pushed passed some initial boundaries and limitations. Progress is underway! A better life is soon realized for these followers. Your leader- Archer
- June 30, 2022: Day Two complete- Another incredible day of self-exploration, reflection, productive self-healing and group healing. Can't wait to provide my dual-approach method for maximizing life to the public. Your better life can be realized very soon. Contact me for details and invitations to future programs. Your forever leader- Archer
- July 1, 2022: Day Three complete and Program Completion Celebration- We are done with transforming the lives of these followers who participated in the program. Everyone had amazing experiences and all of the initial feedback was positive. Some participants were barely able to control themselves! One could barely stand on their own! Talk about being overwhelmed by emotional progress and change. TY Archer
- I can't wait to share this program with more of you. Please continue to spread the word. Check out the wonderful results that will be posted by the participants themselves over the coming days. They all recorded their celebration experience and I asked them to share their excitement with the world. All Eyes on Me! If you are knocked down, be the Phoenix and rise back up!!
- 20,000 Followers!!!! I am so humbled by the support and I love telling everyone about my success and offering hope to so many people. Thank you all. Truly your leader- Archer.

EXHIBIT 2

**THE DISTRICT COURT OF TRAVIS COUNTY
STATE OF OKLAHOMA**

| | | |
|---|---|--------------------|
| DEMPSEY CARLISLE, Individually |) | |
| and as Parent and Next of Kin of |) | |
| BLAKE CARLISLE, Deceased, |) | |
| |) | |
| PLAINTIFF, |) | |
| |) | |
| vs. |) | CJ-2023-247 |
| |) | |
| ARCHER DeGRAY, Individually, |) | |
| |) | |
| DEFENDANT, |) | |

**DEFENDANT’S RESPONSES TO
PLAINTIFF’S REQUESTS FOR ADMISSION**

Defendant Archer DeGray submits the following responses to Plaintiff’s Requests for Admissions:

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1: Admit that the sole and proximate cause of the subject collision on July 1, 2022, wherein Blake Carlisle sustained fatal injuries, was the required participation in the Defendant’s “RC Ride” challenge from June 29-July 1, 2022.

RESPONSE TO REQUEST NO. 1: Denied. Defendant did not require participation in the program, Defendant did not operate a motor vehicle where Decedent was a passenger, and Defendant was not involved in the subject MVA.

REQUEST FOR ADMISSION NO. 2: Admit Decedent Blake Carlisle was fatally injured in a motor vehicle crash on July 1, 2022, after leaving Defendant’s property and after having participated in the “RC Ride” challenge during the preceding forty-eight (48) hours.

RESPONSE TO REQUEST NO. 2: Admitted, but Defendant objects to and denies any connection, whether causal or otherwise, between the July 1, 2022, MVA involving Decedent and the event held on Defendant’s property from June 29th through July 1, 2022.

REQUEST FOR ADMISSION NO. 3: Admit the “RC Ride” challenge is a multi-hour sequence of activities hosted by You, promoted by You, directed by You and, in all material ways, controlled and supervised by You where participants are compensated for engaging in the alternating consumption of stimulants and depressant substances.

RESPONSE TO REQUEST NO. 3: Admitted in part and denied in part. The RC Ride challenge is one part of a program that involves many types of activities and self-healing exercises designed to maximize participants’ lives. Specific beverages containing proprietary mixtures are provided to accentuate the program’s functioning, but participants are never compelled or forced to engage in any activity. Moreover, participants are free to leave the premises at any time.

REQUEST FOR ADMISSION NO. 4: Admit the “RC Ride” challenge includes the consumption of beverages with stimulants and depressant ingredients or substances.

RESPONSE TO REQUEST NO. 4: Denied in part, but Defendant admits one part of the program does involve participants consuming, voluntarily, a coffee-like beverage and a calming beverage not dissimilar to warm tea.

REQUEST FOR ADMISSION NO. 5: Admit the beverage “Up Shot” contains a blend of ingredients and substances that was created by You, prepared by You, bottled by You and sold or distributed by You, including for the RC Ride challenge events on June 29 through July 1, 2022.

RESPONSE TO REQUEST NO. 5: Admitted, but Defendant states the composition of “Up Shot”, like “Down Ride”, is a confidential, proprietary blend of vitamins, caffeine, and other natural ingredients.

REQUEST FOR ADMISSION NO. 6: Admit participants in the “RC Ride” challenge are not informed of the full composition of the “Up Shot” and/or “Down Ride” beverages, in that the presence of stimulating (for Up Shot) and depressant (Down Ride) substances is not disclosed.

RESPONSE TO REQUEST NO. 6: Admitted in part. Participants are informed of the potential effects from the “Up Shot” and “Down Ride” beverages, but the complete mixture composition is confidential and proprietary.

REQUEST FOR ADMISSION NO. 7: Admit the beverage “Down Ride” contains a blend of ingredients and substances that was created by You, prepared by You, bottled by You and sold or distributed by You, including for the RC Ride challenge events on June 29 through July 1, 2022.

RESPONSE TO REQUEST NO. 7: Admitted, but Defendant states the composition of “Down Ride”, like “Up Shot”, is a confidential, proprietary blend of vitamins, minerals, and natural ingredients.

REQUEST FOR ADMISSION NO. 8: Admit You Defendant DeGray self-identify as a “social media influencer” and that your primary source of income is based on social media traffic and sales of various products created by You.

RESPONSE TO REQUEST NO. 8: Admitted, but Defendant objects to and denies any connection, whether causal or otherwise, between the July 1, 2022, MVA involving Decedent and Defendant’s social media presence or Defendant’s sources of income.

REQUEST FOR ADMISSION NO. 9: Admit “Up Shot” is a mixture of other energy drinks and caffeine that can be purchased from local gas stations.

RESPONSE TO REQUEST NO. 9: Denied. Defendant states the composition of “Up Shot”, like “Down Ride”, is a confidential, proprietary blend of vitamins, caffeine, and other natural ingredients.

REQUEST FOR ADMISSION NO. 10: Admit “Down Ride” contains ethyl alcohol or ethanol.

RESPONSE TO REQUEST NO. 10: Admitted in part. “Down Ride” contains a proprietary blend of vitamins, minerals, and other natural ingredients, specifically including a proprietary liquid component that is processed and created by Defendant for inclusion into “Down Ride”.

As discovery is pending, Defendant reserves the right to change, amend, or alter these Responses based on additional information disclosed through this litigation up to the time of pretrial or trial.

Respectfully submitted,

L. Drummond

Leo F. Drummond
Dearn, Drummond & Roebuck, PLLC
P.O. Box 10293847
Oklahoma City, OK 73113
Attorneys for Defendants

EXHIBIT 3

The Faces of Influence- Good or Evil, Right or Wrong, Love or Hate, Forgiveness or Vengeance. We always have a decision.

By: Dempsey Carlisle, forever parent to Blake Carlisle

Parents-be active in the lives of your children. Teach them what is good, what is right, how to love and how to forgive. Be involved when they are little and inside your home. No matter what mistakes you've made to that point in life, no matter how unqualified you feel, just be there and share what you know. You do not have to be an example of perfection- none of us are. You will always have something to teach them. The task is easier when they live with you, but your influence on them does not stop when they move out. Be an important influence in their life, both when they are young and when they grow up and "know better than you". Be available when they are older. Never be more than a phone call away. Adapt to the changes in life and work to be an influence they need at all times. No matter what you do and how much you prepare, once your child is out in the world, they will be influenced and affected by the decisions of strangers. Your child will see good, evil, right, wrong, love and hate. Prepare them as best as you can.

I am not sure what would be a worse fate-losing a loved one without a chance to save them or being there with a chance, but still losing them. It makes no difference for our family now-our story has been written. I do not know of a greater pain in life than losing a child. Unfortunately, I now know that pain. I wasn't there at the critical moment with a chance to save my child, maybe you will be. I would give anything to have had a chance to just whisper in Blake's ear-hey, don't do this, don't listen to them, please don't do what they want you to do. My family lost our child Blake Carlisle on July 1, 2022. The initial days that followed were dark, so very dark. Every day, though, the sun ignored my pain and rose to light the world. I realized I needed to act. My anger turned into a drive to find out what happened to cause this loss. I needed to try and save the next victim. What I discovered quickly turned my drive back into anger. My child died because of intentional conduct by other people. They may not have intended to end a life, but they certainly acted in their best interests at the expense of and to the detriment of my child.

Finding out that you have to watch the red dirt of God's country turned over to cover your flesh and blood because of the decisions of other people is a version of Hell I wish I did not know. My soul was crushed, my faith was destroyed, I had no reason to go on or get up in the morning. Since July 2022, I've wavered between paralyzing grief and the regrettable desire to watch the people responsible for this pain burn. Some days I wanted to hide from the world. On other days, my sole purpose was to return the pain to those who caused it. I justified my anger as being "righteous" because I had been hurt. No matter what I thought or wanted to do, I was right, because others had wronged me. I thought I had the right to demand an eye for an eye and, at the worst times, I wanted all of the eyes. Blake did not die in an "accident". Blake died because of intentional decisions and conduct by people. People who did not have to do what they did. People who could have saved Blake's life. People who should have learned what is good, what is right, what love and forgiveness are in this world.

Blake Carlisle was an incredible person who loved the world and lived out the calling to love your enemies like neighbors. Blake lived as we would all want to live. Blake loved as we should all want to love. Blake was the best of us and was a better person than I've ever been. Blake was certainly a better person than the people who snuffed out the brightest light I've ever seen on this side of Heaven. I am still here because of Blake. Even though Blake was an adult and had not lived in our family home for several years, I am still fighting for Blake. I do not want Blake's story to end with a crash. I publish this article after researching and investigating the causes, failures, decisions, actions and inactions that played a role in causing my family's pain. I never want another family to suffer as we have. I hope this is a call to arms for us all to do better, to be better, to turn toward what is good, what is right, to live with love and forgiveness. At times though, we must call out and fight against what is bad and wrong in life. We should all stand united against hate. We must promote forgiveness and extinguish the fire for vengeance. Revenge is something I have been guilty of wanting since July 2022. So, I put this article out to the world to hold myself accountable and to ask us all to be more like Blake was and certainly more like Blake would want us to all be.

The tip of the spear that pierced my child's heart is the youngest member of a family with a long history of causing harm to others. Whether you already knew of the DeGray family or not, their history is unlike anything I've ever seen, read or heard about. I created an account on an ancestry research site and was able to browse hundreds of public records. I saw several entries on immigration rolls that had been scanned and uploaded for public research. The August 1790 census was the first clear record of the family in this country. Then, around 1850, the family purchased a small farm in northwest Mississippi. Over the next sixty (60) years, that farm grew into one of the largest operations in the Mississippi Delta region. The DeGray family grew as well and amassed a sizeable fortune through varied and far-ranging business enterprises. I concede their core cotton operation was unique for that time and area in that the people who worked there were paid and treated fairly. The family did not appear to be involved in the buying or selling of human labor. Often, the workers received some degree of ownership in the products generated from the operation. However, apparent compassion aside, the family certainly looked out for their own at the expense of others.

In 1927, the Mississippi River flooded, overran the levees, and inundated some 27,000 square miles of farmland in the Delta area. The "Great Mississippi Flood" covered nearly every inch of the DeGray family's properties. This disaster was devastating to the entire area, but industries that were tied to the land were uniquely affected. Most of the region had been built, developed, and sustained by the work of low-cost labor, DeGray operations excluded. The Great Flood of 1927 displaced almost the entire labor force across the Delta to other areas of the county. The DeGray family also moved away, but under far more comfortable conditions.

In the few years before the 1927 flood, the DeGray family had started selling off pieces of their property holdings and business assets. In what can only be described as incredibly fortunate timing, the DeGray family ended up with sufficient funds to move their entire family away to set up new businesses without much downtime. As far as I can tell, none of the prior arrangements for compensating workers on DeGray properties before 1927 were upheld after the flood. Hundreds of workers were literally left with only what they could carry as they sought refuge from the rising waters and then as they set out for new lives after the waters receded.

Interestingly, a generation or two prior to the flood, the DeGray properties were spared from damage during that “small conflict” that tore the country apart in the late-1800s. Despite being physically located in the South, I learned the DeGray’s maintained significant investments, deposit accounts, bond holdings, ownership interests and other financial connections with numerous institutions located on the Union side of that four-year disruption. It then became apparent, that the DeGray’s “kindness” for the people whose work helped build their financial empire was nothing but the sharing of tiny scraps of food leftovers from a huge feast occurring in the other room just out of the workers’ reach. This revealed the family’s motivation for societal recognition and displays of kindness, but only from their “excess” holdings. Sharing your bread as a sign of sacrificing self for others, does not seem to mean as much when you have already stuffed yourself with food and drink before sitting down.

The DeGray family moved several hundred miles northwest to this area of the country where an entirely new industry had been recently established and was taking off. In 1928, a giant oilfield was discovered in Oklahoma City, and the entire region’s economy was stabilized. Whether you identify the first commercial oil well in Oklahoma as the 1897 Bartlesville gusher or the 1890 well at Chelsea in Indian Territory, oil has played a crucial role in this State’s story. The same is true for the modern chapters of the DeGray family saga.

Throughout the 1930s, the DeGray family settled across several spots on the stretch of land between Oklahoma City and Tulsa. Their wealth was invested in oil production ventures that eventually expanded to include many other diverse business interests connected to petroleum production. Consistent with their good fortunes during the War Between the States (Civil War), the exponential increase in demand for petroleum prior to and during World War II was a great financial benefit to the DeGray family. In reality, their business connections were leveraged to influence many branches of local, state, and even the federal government, for favorable information, contracts, agreements, and securities that only served the members of the family. Even when the oil and gas industries “busted” or were affected by external and international interests, the DeGray family continued to thrive. Sure, they would show up at community functions or hand over a donation for the local school or library in difficult times. Amazingly, they always seemed to get their picture taken at the exact moment they were handing over an envelope or check to the school children or local official. While I do not smear generosity, I do want to add some context to show that the DeGray family always put themselves first, no matter the harm to others and no matter the difference that more generosity could have made to the lives of many other people. This history shows that the motivation for the Old Money DeGray family members is the exact same for those who carry the name currently: Us before All Others.

The youngest DeGray version is motivated by the same principle that decided every prior choice made by the family with one small addition. “Us before All Others” was not enough, now it seems to be “Mr before Us before Others”. This person does not invest in land, crops, minerals or work to produce domestic energy for the country. Instead, this New Money member of the family is selling snake oil on-line. They have found a shiny new, on-line method to pitch and sell the same old illusory guarantee of a better life-something that is not attainable, at least not in a can. They are a self-proclaimed “influencer” who does not actually make, create or produce anything tangible. They do not appear to be offering investing advice or tips on how to get money to work

for you instead of working for money. Instead, they are selling a “lifestyle”-a path to better life, easier life, a more-fulfilling existence.

According to the things I’ve seen since July 2022, this person is the only one who apparently knows how to “maximize” life. Conveniently, that better life now comes in a two-can set. Our best life is just waiting to be purchased and consumed. It is the same old sales line, just in a new package: “Even you can now afford the unattainable”, just follow me, like me, feed me, watch me, listen to and believe me.

I was so disheartened to realize that my child was influenced so strongly and so completely by this sales-pitch. Blake did everything DeGray said to do, including getting behind the wheel of a car while exhausted, incoherent, impaired, and in every other way unable to do so safely. My child did not know what they were doing. My child was unable to make sound, safe, and prudent decisions because of what DeGray made Blake and others do over several days. This isn’t even the first time the influence of that specific DeGray offspring has caused harm. Apparently, the old DeGray family motto wasn’t selfish enough. Now it seems its “Me before Us, then Others”.

Several years ago, there was an oil protest led by Archer DeGray. Archer had enough influence to recruit a dozen or so people to “lock arms against oil” by interrupting traffic on Interstate 40 near downtown Oklahoma City. A few protestors literally glued themselves to the road. They had to be chiseled out by first responders. Clearly, the DeGray influence was strong enough to cause people to subject themselves to harm. Worse still, because of the traffic problems caused by the protest, an ambulance carrying a critical patient was unable to reach the hospital in time and the patient passed away. Another disturbing but revealing fact from the protest was that the DeGray family made millions from selling mineral interests they purchased from the bankruptcy proceedings of Quadstone Energy. Quadstone was a local production and drilling company that was sued in 2017 by the citizens of Wheatville for causing an earthquake that destroyed most of the town. The citizens won at trial but lost in the end because the company went bankrupt. The assets were liquidated and the DeGray family was somehow able to purchase a few thousand acres of mineral interests and then flip them for profit a few years later. So, around the time the older DeGray contingent was making millions from flipping mineral interests, the new money branch was protesting oil. The hypocrisy of this family is incredible. This is another example of the influence of the DeGray family to place their interest ahead of all others without recourse or consequence.

To the matter at hand, I got a couple of those DeGray better life in a can drinks and had them tested. One was “UpShot” and had light blue text on an orange background. The other was “Down Ride” and had purple text on a blue background. Guess what? Those drinks are filled with stimulants and sedating substances. The orange one has tons of caffeine and the blue one may have had alcohol. I could not find any ingredient listings or information that would tell the consumer what they were actually drinking. There are no labels or warnings on the drinks. I know there was nothing on the can, on-line, or anywhere else informing the public, consumers, or my Blake of the presence of alcohol. Once again, a DeGray family member is not telling others what is actually going on and is only trying to get the other person to buy whatever they are selling. Our community is put in danger by this type of conduct. We cannot let this go unpunished.

Stimulants and depressants are impairing substances. To varying degrees, both affect the brain and how the brain receives, processes, and reacts to stimuli, internal and external. As we all recognize, if consumed without restriction either substance can cause health problems. Specific to this matter, a person who has consumed either substance, or both, without knowing what they have been given, would be unable to safely operate a car. Blake was impaired because of the actions and conduct of another person.

It takes a village to raise a child. Well, a parent can only do so much to protect and prepare that child for a village that allows evil, hate, selfishness, and disregard for humanity to remain entrenched in the community. That is not my village or community. I did what I thought was best for Blake, but I now realize society can be better as a group than any individual. We all fall at times, but we can all be there to help each other stand back up.

What happens in this corner of the world when a tornado tears up a town and lives are lost? We unite, we come together, we mourn, we help each other, we rebuild, we all work to restore what was destroyed. The "Oklahoma Standard" was forged out of an incredibly painful tragedy and the loss of 168 innocent lives nearly thirty (30) years ago. I believe this standard applies at all times-before tragedy, just as much as after. I am calling on all members of the public in this great community to stand up and say enough is enough. We unite before tragedy, after tragedy, and we certainly work together to prevent tragedy. This moment is an opportunity to prevent another tragedy. Holding each other accountable is not wrong. In my opinion, holding people who could have prevented tragedy, who had the opportunity to prevent tragedy, and who failed to act appropriately accountable for their failure to act is good and right. Holding each other to be better is a way to show love. Helping each other forgive and working to prevent harm is the community I want.

I understand the reluctance to hold others accountable for failures. We all fail at times in some way, and I have plenty of sins and skeletons. Personally, I am not in a position to expect more from people than I expect from myself. However, the community should be better than the individual. I recognize there is evil all over the place and I absolutely believe holding the DeGray's accountable for what they are doing is one step we, as a united community, can take to make this world better. I know Blake would agree with me. I know I will see Blake again, some day.

We have a decision to make. Our community must decide what we are going to do if anything. Please stand with me to do all we can to make sure no one ever goes through this again. We should never let influence harm the innocent.

Thank you.

Dempsey Carlisle

EXHIBIT 4

Front of Guest House on DeGray Property:



Entrance to back of DeGray Property:



Reverse view of entrance to DeGray Property:



View of “Challenge Completion Celebration” location on July 1, 2022 on DeGray Property:



Images of “UpShot” and “Down Ride” cans provided to “RC Ride Challenge” participants during June 29th-July 1st, 2022 program



EXHIBIT 5

LIMITED AUTOPSY AND CONCLUSION REPORT

Decedent: Blake Carlisle
Birth Date: June 29, 2000
Case: Private-PL 2022-07-01
Type of Death: Blunt Force Trauma- MVA (Initial Presentation)
Autopsy Performed by: Sawyer Edgar, M.D.

| |
|---|
| CERTIFICATION I hereby certify that this document is a true and correct copy of the original document. By: <u>Sawyer Edgar</u> |
|---|

The Carlisle family has requested and retained my professional services to perform an autopsy on the Decedent and focused specifically on testing and determining, if possible, the types and effects of certain substances ingested in the hours prior to death.

PRIMARY CAUSE OF DEATH:

Blunt Force Trauma from motor vehicle accident on July 1, 2022.

OTHER CONTRIBUTING CAUSES:

Possible intoxicating substances at sufficient levels for likely impairment of cognitive functioning.

The facts herein are true and correct to the best of my knowledge and belief.

| | | |
|---|---------------------|--------------------------|
| <u>Sawyer Edgar, MD</u> | Private Facility | July 6, 2022 |
| Sawyer Edgar, M.D.-Forensic Pathologist | Location of Autopsy | Date and Time of Autopsy |

MEDICOLEGAL INVESTIGATION

I. CIRCUMSTANCES OF DEATH:

Decedent was involved in a one-car motor vehicle accident around 23:00 (11:00 p.m.) the evening of July 1, 2022. Decedent had been participating in a retreat or self-healing workshop over the two (2) days preceding the MVA. According to Decedent's family, there was prolonged, repeated, and alternating activities involving the consumption of liquids with stimulant and depressant ingredients. Reportedly, the contents of the liquids were not disclosed to those who were ingesting the same. The Carlisle family wants to know whether Blake was impaired at the time of the MVA and if so, from what substance(s).

II. AUTHORIZATION:

This examination is performed at the request and with the consent of the Carlisle family, survivors of Blake Carlisle, for potential wrongful death litigation.

III. IDENTIFICATION:

Body identified by visual recognition of family.

POSTMORTEM EXAMINATION

- I. CIRCUMSTANCES OF THE EXAMINATION: Requested by family and limited to indicators of possible intoxication or impairment by ingested substances of unknown type, kind, volume or origination point.
- II. EXTERNAL EVIDENCE OF RECENT MEDICAL THERAPY: None.
- III. COLLECTIONS: Blood, urine, tissue from digestive tract, small intestines, liver, kidneys and multiple organ tissues were collected.

EXTERNAL EXAMINATION

Limited due to scope of examination being focused on suspected intoxication of Decedent prior to death. However, no indicators of injections or substance use other than through oral ingestion.

INTERNAL OBSERVATIONS

Decedent was found on the driver side of a small car after a collision with a highway overpass. No other vehicles were involved.

Decedent's entire digestive structure showed significant evidence of intoxicating substances through the organs and involved tissues. Samples were taken and intoxicating substances were confirmed from Decedent's mouth, saliva, throat (minimal), stomach (with allowance for post-mortem diffusion), kidneys and bladder. A urine sample was also taken. This widespread evidence suggests prolonged exposure and ingestion of intoxicating substances over the 24 hours or so preceding death.

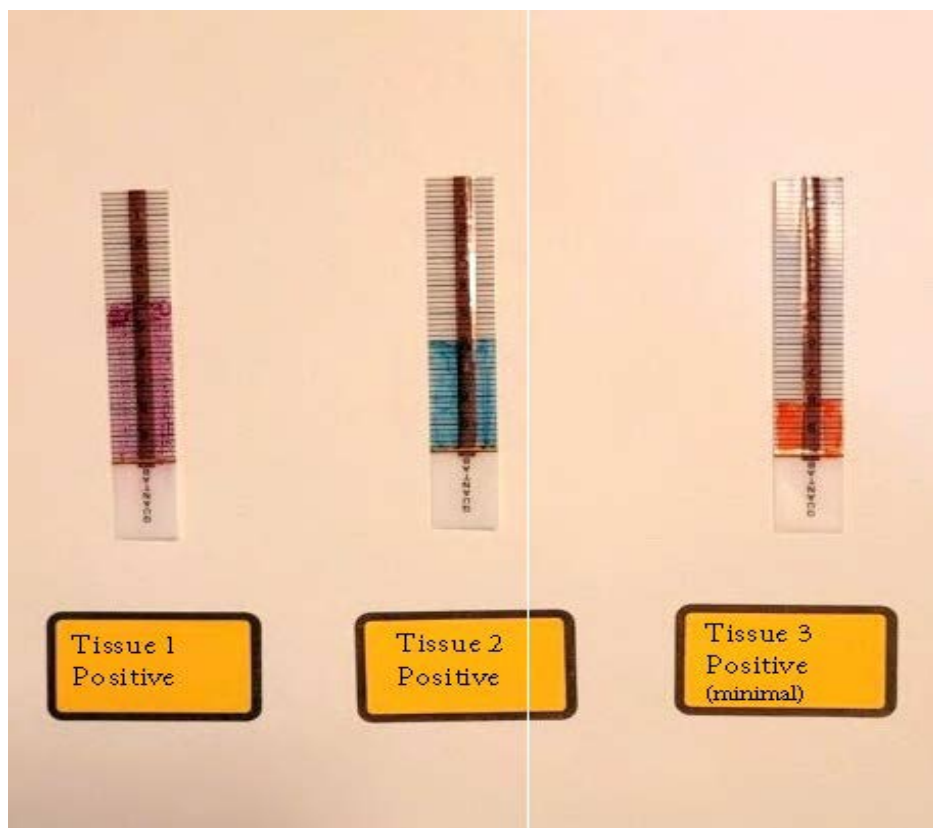
Vitreous humor is strongly recommended as a body fluid for determination of ethanol in postmortem toxicology to help establish whether the deceased had consumed ethanol before death. While there was significant damage to Decedent's head and face, samples of this tissue was secured and submitted for analysis.

Less common autopsy specimens were submitted for analysis including bile, bone marrow, brain, muscle tissue, liver, synovial and cerebrospinal fluids. Some investigators recommend measuring the water content of autopsy blood and if necessary, correcting the concentration of ethanol to a mean value of 80% w/w, which corresponds to fresh whole blood. Water content was not a concern for this case and no allowance was included for this condition.

TOXICOLOGY

Postmortem blood, collected from the chest cavity, and vitreous humor samples were collected following harvesting of the heart, eyes (limited) and bones. Tissue samples were also collected from the stomach, liver, and bladder. Gas chromatographic analysis revealed a blood ethanol concentration of 0.10 g/dL and a vitreous humor ethyl concentration of 0.08 g/dL. The stomach was intact and partial full of fluid, but little to no food. The contents were collected and tested with markers and indicators for the presence of ethyl alcohol at variable degrees of absorption occurring prior to, at the time of, and after death. The liver was unremarkable, but tissue testing confirmed markers as indicated. A contents sample from the bladder also confirmed the presence of ethyl alcohol, but at a much lower level than samples “higher” along the digestion tract.

Visual confirmation is documented below:



SAMPLE #1- Stomach Contents; #2- Liver Tissue; #3- Bladder Contents

There is industry research to support the conclusion that the human body can produce alcohol-like markers after death through microbial contamination and fermentation. Ethanol that remains unabsorbed in the stomach can allow for continued local diffusion into surrounding tissue. Allowances were made for these contingencies.

Possible explanations for the difference between the results include diffusion of ethanol from the stomach into the chest cavity, contamination of the blood sample prior to collection, and ingestion

of a sizeable quantity of ethanol shortly before death. This case demonstrates the importance of proper quality assurance procedures in collecting postmortem specimens and of collecting a vitreous humor sample for ethanol analysis in postmortem toxicology cases.

Biochemical tests and markers of postmortem synthesis of ethanol were present in most of the tissues collected for this case. These include the urinary metabolites of serotonin and non-oxidative metabolites of ethanol, such as ethyl glucuronide, phosphatidylethanol and fatty acid ethyl esters.

OPINION

With a reasonable degree of medical certainty, Decedent Blake Carlisle, did ingest several intoxicating substances prior to death. Ingestion occurred over at least a 24-hour timeframe based on the locations and varying states of digestion. Some substances were found still in Decedent's stomach-which supports consumption in the immediate time period (an hour to several hours) prior to death. Substances were also found along the lower digestive tract including intestines and bladder. These findings support a prolonged duration of consumption (several hours to a day or so).

While I cannot speak to Decedent's awareness or knowledge about the liquids consumed, I do confirm to a degree of medical certainty that intoxicating substances were ingested by Decedent at levels sufficient for markers to be found throughout the digestive organs and tissues after death.

Sawyer Edgar, MD

Sawyer Edgar, M.D.

EXHIBIT 6

Central Plains Environmental Testing
1300 N. Martin Luther King, Ave
Oklahoma City, OK 73181

| <u>Invoice to:</u> | <u>Project Location:</u> | <u>Project Details:</u> |
|--------------------------------------|---------------------------------------|---|
| Dempsey Carlisle Self/Private Pay | CPET Labs (in-office) OKC Facility | Testing and composition determination of certain liquids provided by client. |

-Laboratory Report- CPET OKC Facility

Procurement of Samples and Analytical Overview:

Two samples for analysis arrived at CPET’s Oklahoma City testing facility on August 18, 2022. The package arrived by personal delivery from client and both cans were unopened and in satisfactory condition with no evidence of damage or tampering on external review. The purpose of the analysis is to determine the composition of the liquids within the cans. Specifically, testing for stimulants in the can labeled “Up Shot” and testing for depressant substances in the can labeled “Down Ride”.

Process:

The cans were secured pending testing. In a sterile environment and after external wash, the cans were opened. Then, the contents were poured into separate sterile holding containers. Different testing strips were placed into separated samples from both cans. Photographic documentation was created for each test result- positive and negative. Positive results are listed below.

These cans are identified as proprietary commercial products. Therefore, this analysis is for personal information only. Any results are not to be shared publicly or with anyone other than the client.

Data and Results:

- *“Up Shot”- a liquid with suspected stimulant ingredients*
 - Composition: Carbonated Water- 80%; Energy Blend-15% of total volume: Citric Acid, L-Carnitine, Inositol, Sodium Citrate, Potassium Phosphate, Natural Caffeine/Stimulants (detailed below)-450 mg; Sodium- 2%-100 mg; Potassium-less than 2%- 82 mg; Magnesium Lactate- 1%; Sweeteners [Sucralose, Glucose, Erythritol-less than 1%]; Sorbic Acid and Benzoic Acid (Preservatives).
 - Stimulant(s): Confirmed
 - Natural Caffeine [Coffee Bean extract and raw bean distillate; Ginseng; Guarana, Yerba Mate, misc. coffee grounds]

- B-group vitamins: B6- 10 mg, B12- 12 mg,
 - Niacin [Vitamin B3- 32 mg]
 - Pantothenic Acid [Vitamin B5- 21 mg]
 - Taurine- 35 mg
- **“Down Ride”- a liquid with suspected depressant ingredients and substances**
 - Composition: Carbonated Water- 80%; Depressant Blend-15% of total volume: Citric Acid, Diphenhydramine, acrivastine, cetirizine, other acetylcholine blockers, doxylamine, anhydrous dibasic calcium phosphate, FD&C blue no. 1, magnesium stearate, microcrystalline cellulose, Sodium Citrate, Potassium Phosphate, Potassium-less than 2%- 82 mg; Magnesium Lactate- 1%; Sweeteners [Sucralose, Glucose, Erythritol-less than 1%]; Sorbic Acid and Benzoic Acid (Preservatives).
 - Depressant(s) Ingredients: Confirmed
 - Diphenhydramine
 - Doxylamine succinate
 - Melatonin
 - Valerian
 - Ethyl alcohol

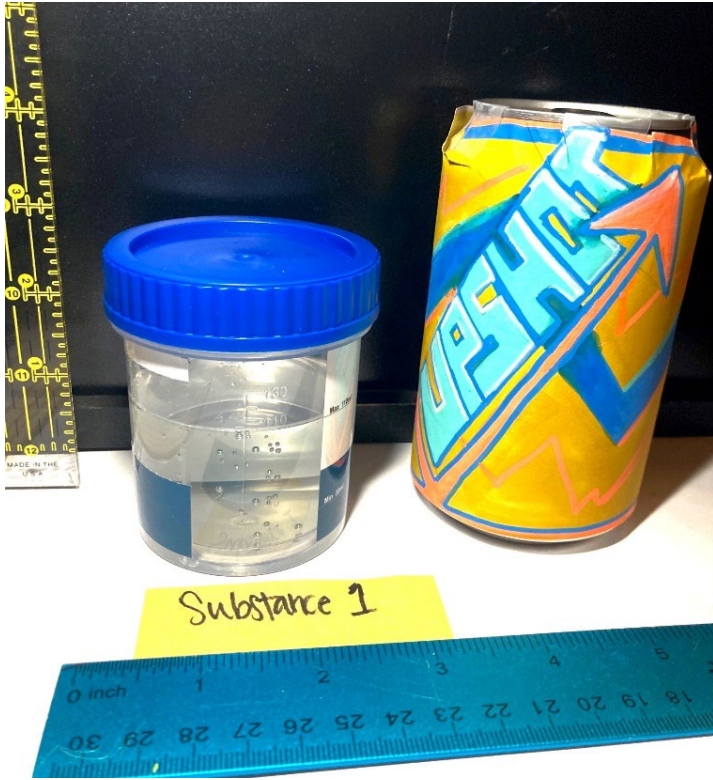
Analyzed at the CPET Oklahoma City laboratory with internal review and verification of date and results. Dated this 25th day of August, 2022.

Sullivan R. David _____
 CPET Technician and Manager

CPET Testing Data and Results Photographs

Descriptions are provided above each photograph.

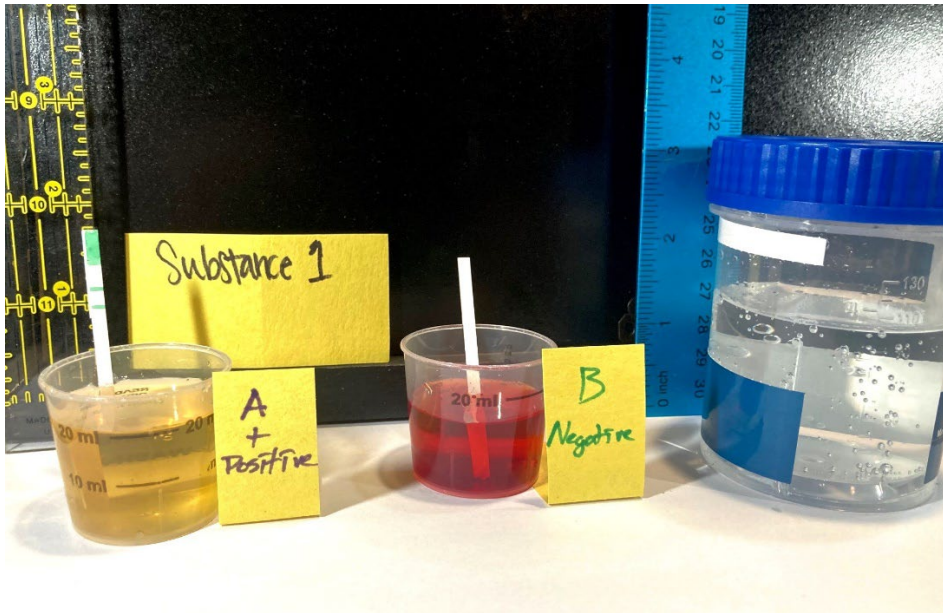
Substance 1- “UpShot” liquid/ingredients:



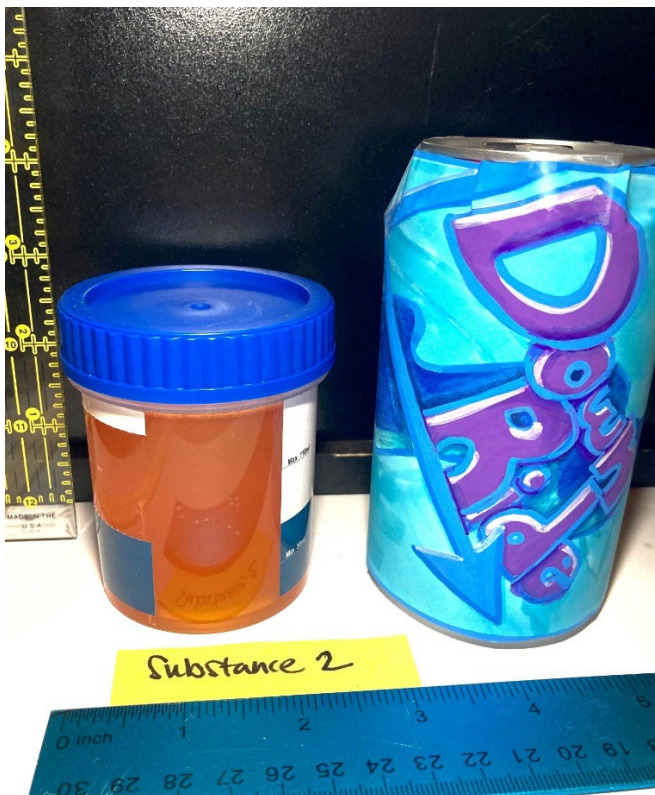
Substance 1 Testing- Full Panel with confirmed presence of stimulants:
[Primary A Positive and Primary B Positive]



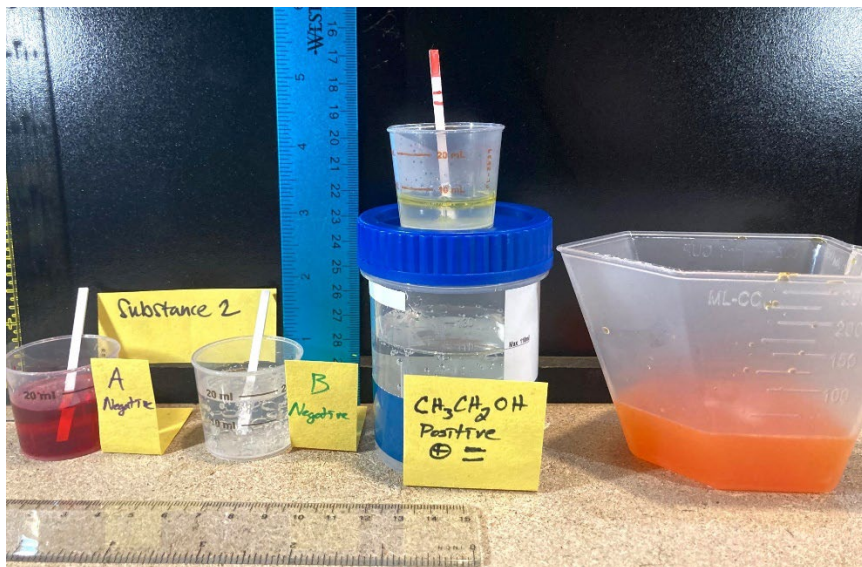
Substance 1 Testing- Stimulant Panel with confirmed results:
[Primary A Positive and Secondary B *Negative*]



Substance 2- "Down Ride" liquid/ingredients:



Substance 2 Testing- Full Panel with negative presence of prescription depressants:
[Primary A *Negative*, Primary B *Negative*, Ethyl Alcohol Positive]



Substance 2 Testing- Depressant Panel with Ethyl Alcohol presence confirmed:
[CH₃CH₂OH- Positive result]

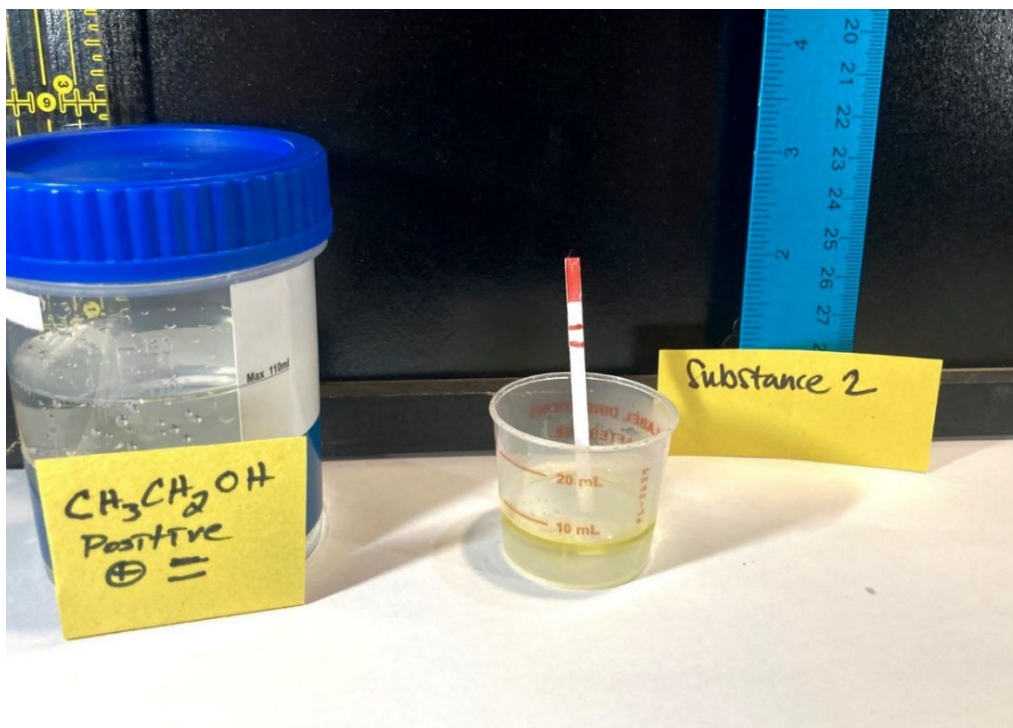


EXHIBIT 7

**IN THE DISTRICT COURT OF TRAVIS COUNTY
STATE OF OKLAHOMA**

| | | |
|--------------------|---|-----------------------|
| STATE OF OKLAHOMA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. CF-2023-6314 |
| |) | |
| ARCHER DEGRAY, |) | |
| |) | |
| Defendant. |) | |

INFORMATION

STATE OF OKLAHOMA, COUNTY OF TRAVIS:

I, Harvey Dyke, the undersigned District Attorney of Travis County, State of Oklahoma, in the name and by the authority, and on behalf of the State of Oklahoma, give information that on or about the 1st day of July 2022, in said County of Travis in the State of Oklahoma, Archer DeGray, did then and there unlawfully, willfully, knowingly and wrongfully commit the crime of:

COUNT 1: **MANSLAUGHTER IN THE SECOND DEGREE**, in violation of Oklahoma State Statute Title 21, Section 716, by engaging in conduct resulting in the death of a human, Blake Carlisle, by providing impairing substances for consumption without disclosing the contents and otherwise engaging in culpable negligence against another which caused death, contrary to the provisions of section 716 of title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma. Furthermore, **REDACTED**-----

By: Harvey Dyke
Harvey Dyke, OBA #100
District Attorney in and for
Travis County, State of Oklahoma

**IN THE DISTRICT COURT OF TRAVIS COUNTY
STATE OF OKLAHOMA**

| | | |
|--------------------|---|-----------------------|
| STATE OF OKLAHOMA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. CF-2023-6314 |
| |) | |
| ARCHER DEGRAY |) | |
| |) | |
| Defendant. |) | |

**PLEA OF NOLO CONTENDERE
SUMMARY OF FACTS, PLEA AGREEMENT AND SENTENCE**

Part A. Findings of Fact, Acceptance of Plea:

1. Is the name just read to you your true name? Yes
2. My lawyer's name is: L. Drummond
3. Do you waive the right to have a record made of these proceedings by a Court Reporter? Yes
4. Age: 22, Grade completed in school: High School

5. Can you read and understand this form? Yes
6. Are you currently taking any medications or substances which affect your ability to understand these proceedings? No, nothing currently; REDACTED-----.
7. Have you been prescribed any medication that you should be taking, but you are not taking?
No
8. Have you ever been treated by a doctor or health professional for mental illness or confined in a hospital for mental illness? No, not for mental illness.

9. Do you understand the nature and consequences of this proceeding? Yes
10. Have you received a copy of the Information and read its allegations? Yes
11. Does the State more to dismiss or amend any case(s) or count(s) in the information? No

12. Do you understand you are charged with:
 - a. Manslaughter- Second Degree
 - b. Are you charged after former conviction of a felony? No
13. Have you previously been convicted of a felony? No
14. Do you understand that a conviction on a plead of nolo contendere to the offense listed will subject you to a minimum sentence of: One Year supervised probation, agreed community service, restitution as agreed with the Carlisle family thorough the District Attorney's office, and other possible terms, including REDACTED-----

15. The Defendant is entering a plea today to the charge of:
 - a. Manslaughter- Second Degree

16. Read the following statements: You have the right to a speedy trial before a jury for the determination of whether you are guilty or not guilty and if you request, to determine sentence. At the trial:

- a. (1) You have the right to have a lawyer represent you, either one you hire yourself or if you are indigent a court appointed attorney.
- b. (2) You are presumed to be innocent of the charges.
- c. (3) You may remain silent or, if you choose, you may testify on your own behalf.
- d. (4) You have the right to see and hear all witnesses called to testify against you and the right to cross-examine them.
- e. (5) You may have your witnesses ordered to appear in court to testify and present evidence of any defense you have to these charges.
- f. (6) The state is required to prove your guilt beyond a reasonable doubt.
- g. (7) The verdict of guilty or not guilty decided by a jury must be unanimous. However, you can waive a jury trial and, if all parties agree, the case could be tried by a Judge alone who would decide if you were guilty or not guilty and if guilty, the appropriate punishment.

Do you understand each of these rights? Yes

17. Do you understand by entering a plea agreement you give up these rights? Yes

18. Do you understand that by entering a plea agreement and having this Court enter a conviction as a result, any future cases against you could result in an increase in punishment(s)? Yes

19. Have you talked over the charge with your lawyer, advised them regarding any defense you may have to the charges and had time to counsel, consider and discuss their advice? Yes

20. Do you believe your lawyer has effectively assisted you in this case and are you satisfied with their advice? Yes

21. Do you wish to change your plea of nolo contendere and the entry of a plea agreement with a conviction by this Court, with sentence to be entered separately? Yes

22. Have you entered a plea agreement with the District Attorney's office? Yes

23. Do you understand the Court is not bound by any agreement or recommendation and if the Court does not accept the plea agreement, you have the right to withdraw your plea of nolo contendere? Yes

24. What is your plea to the charge:

- a. Manslaughter- Second Degree: Nolo Contendere

25. Did you commit the acts as charged in the Information? Pursuant to plea agreement reached with District Attorney's office, Defendant stands on the plea of Nolo Contendere; REDACTED

26. Have you been forced, abused, mistreated or promised anything by anyone to have you enter your plea? No, I've not been abused or mistreated. I've not been promised anything by the District Attorney's office. My family has agreed to include me back as a beneficiary of the family trusts, inheritance and weekly stipends once this criminal matter is resolved, but my decision to enter this plea was made independent of that position.
27. Do you plead Nolo Contendere of your own free will and without any coercion or compulsion of any kind? Absolutely
28. Do you have any additional statements to make to the Court? I stand on my plea of Nolo Contendere but do express regret for the loss of Blake Carlisle and I am sorry for my part in the preceding events.
 - a. Is there any legal reason you should not be sentenced now? No

Having been sworn, I, the Defendant whose signature appears below, make the following statements under oath:

1. Check One:
 - a. X I have read, understood and completed this form.
 - b. _____ My attorney completed this form and we have gone over the form and I understand its contents and agree with the Answers.
 - c. _____ The Court completed this form for me and inserted my answers to the questions.
 2. The answers are true and correct.
 3. I understand that I may be prosecuted for perjury if I have made false statements to this Court.
- I acknowledge this 10th day of November, 2023.

Archer DeGray _____

Defendant Archer DeGray

Part B. THE COURT FINDS AS FOLLOWS:

1. The Defendant was sworn and responded to questions under oath.
2. The Defendant understands the nature, purpose and consequences of this proceeding.
3. The Defendant's plea of Nolo Contendere is knowingly and voluntarily entered and accepted by the Court.
4. The Defendant is competent for the purpose of this hearing.
5. A factual basis exists for the plea entered by Defendant.
6. The Defendant is guilty as charged: (x) after no prior felony convictions.
7. Sentencing shall be imposed as follows:
 - a. REDACTED-----
 - b. REDACTED-----
 - c. REDACTED-----

Portions of this file have been redacted by agreement of the Parties. The Court was presented with information on credible threats to the victim's family and Defendant's family. Thus, redaction as indicated is appropriate.

EXHIBIT 8

Palmer Echols Report

I, Palmer Echols, Ph.D., have been designated an expert by Plaintiff Dempsey Carlisle regarding the pending civil case filed in Travis County, Carlisle v. Archer DeGray, CJ-2023-247. The following statement is a true and accurate recording of my qualifications and my involvement in this matter:

QUALIFICATIONS:

| | |
|--------------|--|
| 1995-1998 | Bachelor of Arts- Mathematics, University of California, Los Angeles |
| 1999-2001 | Masters of Science- Psychology, University of Oklahoma, Norman |
| 2002-2006 | Doctoral Degree- Psychology, University of Luxembourg, Luxembourg |
| 2008-2011 | Post-doctoral Scholar, Psychology, University of Oklahoma, Oklahoma City |
| 2003-2006 | Teaching Assistant, Associate and Fellow, Psychology Department, Univ. of Luxembourg |
| 2008-2013 | Instructor and Assistant Professor, Psychology Department, Univ. of Oklahoma |
| 2013-2020 | Professor, Psychology Department, Univ. of Oklahoma and Univ. of California, Los Angeles |
| 2015-Present | Private Psychology Clinic with varying research projects from U.C.L.A. and O.U. |

DOCUMENTS REVIEWED: I have reviewed completely and wholly the following exhibits:

- Ex. 1: Social Media posts, images and selected statements from Archer DeGray
- Ex. 2: Defendant's Answers to Plaintiff's Requests for Admissions
- Ex. 3: Article on DeGray history and Defendant by Plaintiff Dempsey Carlisle
- Ex. 4: Photographs of DeGray property and "RC Ride Challenge" Items
- Ex. 5: Medical Examiner Report- Examination (Limited) of Decedent Blake Carlisle
- Ex. 6: Chemical testing of "RC Ride Challenge" drinks and substances

PUBLICATIONS AND MEMBERSHIP ORGANIZATIONS

18 papers in psychology journals and magazines, including *Memory & Cognition*, *Journal of Memory and Language*, 115, 104155, several entries in *Journal of Experimental Psychology: General* 149, 156, 160 and 161, and *Psychological Bulletin*, 3, 6, 12, 15, and 22. Finalist for James McKeen Cattell Dissertation Award-National award for completed dissertations in psychology administered by the New York Academy of Sciences. Joseph A. Gengerelli Distinguished Dissertation Award- Award from UCLA psychology department "for the most outstanding

doctoral dissertation in psychology, 2006” from among 25 dissertations completed that academic year. Four (4) time Honorable Mention, National Science Foundation Graduate Fellowship.

CERTIFICATIONS

American Psychological Association (APA)

Recurring member and work in multiple Divisions 2008-Present

Psychonomic Society, Fellow

Cognitive Science Foundation, Regular Member

Memory & Cognition

Associate Editor 2018-2020, Guest Associate Editor 2017-2018

The following professional assessment is my opinion on this matter after reviewing my research, publications, various other authorities, review of the documents identified above, and through conversation with attorneys for the Plaintiff. This opinion is entirely my work, and while I rely on other science and research, the opinions to this case are mine and mine alone, free from any outside influence.

PROFESSIONAL ASSESSMENT

The Icarus Complex is a term in psychology first described in the mid-1900s to consist of attention- or admiration-seeking narcissism, the idea that no goal is off limits while at the same time fearing some foreboding failure, a fetish for fire, and other qualities. As human beings, we have an urge to rise, and we are prone to falling, how we react to that determines our character, and vice versa.

Icarus was a Greek mythological figure who tried to escape imprisonment in Crete with his father Daedalus, using wings Daedalus crafted out of feathers and wax. Daedalus warned Icarus not to fly too close to the sun or too low to the sea. Overwhelmed with the excitement of flying, Icarus flew much too high, and as a result the wax melted, and his feathers fell off. Down Icarus plunged into the sea, and indeed into death as well. The story of Icarus is often used to signify the dangers of over-ambition.

Modern clinical psychology focuses on the problems of the culturological layer, the cultural background and consequences of the formation and development of productive and destructive anomalies, including the abnormal aspects of creative giftedness, the associated and accompanying anomalies of behavior, values expressed in deviations, borderline states, psychoses and somatoses. Endowment with its considerable diversity is a universal phenomenon. Moreover, and like any universal, it can be understood and described in the unity of its cultural, social, psychological and physiological aspects. The concept of “Icarus complex” was introduced as the desired anthropic form of the archetype under study at the time and as a promising model for further research in clinical psychology. Some psychology scholars have mused that “mythology is the family album or storehouse of a culture’s childhood, containing that society’s future, codified as tales that are both poems and oracles.” This might be one reason the Icarus myth and its classical interpretation has been so timeless. Nevertheless, there are various modern applications for this complex and Archer DeGray is a prototypical example.

Typically, the person displays cynosural narcissism, attention seeking or admiration seeking narcissistic behaviors, ascensionism-the notion that the future is not dictated by the past

or present, and no destination or goal is unreachable, combined with an anticipation of falling-a foreboding sense of a future “crash and burn”. Also, the person may display a craving for immortality and perpetual adolescence, a.k.a “Peter Pan syndrome”.

Here, we have a person who believes they are influential to thousands. They refer to themselves as a leader with followers. This person seeks fame, influence, and power. They work to attain these ideas regardless of the cost to others, especially those that are hurt. Archer created a “program” to help others achieve a better life and eventually supplemented the program with a two-can set of beverages. The contents and ingredients of the drinks were not disclosed, and no warnings were provided. One drink contained alcohol, trace amounts, but still a substance that is highly regulated and restricted as to possession and consumption. This is typical narcissistic conduct in that the person acts in their own interests at the direct expense of others. Archer was placing their own interests above the health, safety, and life of guests invited to the DeGray property to engage in the program. The imbalance of power and influence in the relationship structure created by Archer with the followers/participants was increased by the introduction of impairing substances and financial incentive. Archer literally paid people to participate in very dangerous conduct. The participants to the “RC Ride Challenge” were subjected to undisclosed alcohol consumption and combined with prolonged alternating ingestion of stimulants, were rendered unable to act, think, evaluate risks, or otherwise make independent decisions.

CONCLUSION:

Blake Carlisle’s death was the result of restricted cognitive functioning resulting from the prolonged ingestion of undisclosed stimulants and depressants, with cumulative impairment effects that overwhelmed Blake’s independent decision-making capabilities. As the evidence and findings from my review of the autopsy show, the presence of ethyl alcohol was found throughout the body indicating ingestion over multiple hours before death.

In my opinion, the Decedent was unable to comprehend the risk and danger of operating a motor vehicle the evening of July 1, 2022 due to the impaired state. Decedent’s impairment was a direct result of the prolonged and alternating consumption of stimulants and depressant substances. Impairment was inevitable based on the absence of any ingredient disclosures. Decedent was essentially intoxicated when they attempted to operate the vehicle resulting in a fatal crash. Decedent was unable to resist the influence of Defendant Archer DeGray- who displayed many indicators of the aforementioned Icarus Complex and exercised sufficient influence to control the decisions and actions of others. Decedent Blake Carlisle died because of the actions and conduct of Defendant Archer DeGray.

This report is submitted this 14th day of June, 2023.

Palmer Echols

Palmer Echols

EXHIBIT 9

Dallas Exeter Report

I, Dallas Exeter, Ph.D., have been designated an expert for the Defendant Archer DeGray. Plaintiff has filed a civil case filed in Travis County, Carlisle v. Archer DeGray, CJ-2023-247, arising from and related to the death of Plaintiff's adult-child Blake Carlisle on July 1, 2022. The following report is a true and accurate statement of my qualifications, my involvement and professional opinions in this matter:

QUALIFICATIONS:

1999 **Bachelor of Science- Forensic Science (Minor in Toxicology) from University of Cornwell**

2004 **Masters of Science- Psychology, University of Cornwell**

2004-2009 **Associate Professor Psychology, Psychology Department for University of Southern Pangea**

2010-Present **Professor and Lead Researcher, Psychology Department for University of Southern Pangea**

2012-Present **Forensic Medical Consultant- retained for professional evaluations and opinions**

Books and Publications:

5 published articles in *Memory & Cognition*, *Journal of Memory and Language*, 110, 112, 118, and 120-21, several articles in *Journal of Experimental Psychology: General* 162 and 165. Contributing author for quarterly *Psychology and Us* publication issued by Joint Societies for Advancement of Medical Research.

PROFESSIONAL AFFILIATIONS

American Psychological Association (APA) 2018-Present
Psychonomic Society, Associate Fellow
Toxicology Enthusiasts, Private Membership

DOCUMENTS REVIEWED: I have reviewed completely and wholly the following exhibits:

- Ex. 1: Archer DeGray social media posts, images and statements
- Ex. 2: DeGray's Answers to Carlisle's Requests for Admissions
- Ex. 3: Article on DeGray history by Plaintiff Dempsey Carlisle
- Ex. 4: Photographs of DeGray property and "RC Ride Challenge" Items
- Ex. 5: Limited Medical Examiner Report- Decedent Blake Carlisle
- Ex. 6: Chemical testing of "RC Ride Challenge" drinks and substances
- Ex. 8: Report of Palmer Echols

The following professional assessment is my opinion on this matter after reviewing my research, publications, various other authorities, review of the documents identified above, and through conversation with counsel for Defendant. This opinion is entirely my work, and while I rely on other science and research, the opinions in this case are mine and mine alone, free from any undue influence.

PROFESSIONAL ASSESSMENT

From the evidence and information I've reviewed in this case, Archer DeGray did not display any signs of what Palmer Echols identifies as "Icarus Complex". If anything, Archer acted more like a person displaying a dissociative disorder. Dissociative disorders are mental health conditions that involve experiencing a loss of connection between thoughts, memories, feelings, surroundings, behavior and identity. These conditions include escape from reality in ways that are not wanted and may not be healthy. These conditions can cause problems in managing everyday life. However, Archer DeGray was clearly very successful and was followed by and influenced many people.

There are three major dissociative disorders: Depersonalization/derealization disorder, dissociative amnesia, and dissociative identity disorder. The first, Depersonalization/derealization disorder, involves a sense of separation from oneself or feeling like they are outside of themselves. The patient may feel as if they are seeing their actions, feelings, thoughts and self from a distance, like they are watching a movie. Derealization involves feeling that other people and things are separate from the patient and seem foggy or dreamlike. Time may seem to slow down or speed up. The world may seem unreal. The patient may go through depersonalization, derealization or both. Symptoms, which can be very distressing, may last hours, days, weeks or months. They may come and go over many years. Or they may become ongoing. Arguably, Archer has shown indicators for this condition, but none of those indicators persisted or seemed to inform decisions or conduct. Archer seemed cognizant of their own emotions as well as expressing an interest in caring for the emotions of others.

The second disorder, Dissociative amnesia's main symptom is memory loss that's more severe than usual forgetfulness. The memory loss can't be explained by a medical condition. The patient can't recall information about themselves or events and people in their life, especially from a time when they felt shock, distress or pain. A bout of dissociative amnesia usually occurs suddenly. It may last minutes, hours, or rarely, months or years. Dissociative amnesia can be specific to events in a certain time, such as intense combat. More rarely, it can involve complete loss of memory about oneself. I do not see any indications for this disorder in Archer's past or present.

Finally, Dissociative identity disorder- Formerly known as multiple personality disorder, this disorder involves "switching" to other identities. You may feel as if you have two or more people talking or living inside your head. You may feel like you're possessed by other identities. This disorder is clearly not applicable to Archer DeGray. Archer displayed a well-developed mental fortitude and mature self-identity.

Dissociative disorders usually arise as a reaction to shocking, distressing or painful events and help push away difficult memories. Symptoms depend in part on the type of dissociative disorder and can range from memory loss to disconnected identities. Times of stress can worsen symptoms for a while, making them easier to see. If anything, the family dynamics of the DeGray family support a challenging and detrimental upbringing for Archer. The fact that Archer has overcome a clearly unsupportive childhood is impressive and shows the resiliency developed as they grew into an adult. There is nothing to indicate Archer DeGray received any treatment for a mental illness of any kind. I submit there is no evidence to conclude Archer needed any treatment. They appeared to be a well-adjusted adult of sound mind with ambitious goals for life.

Finally, Archer DeGray did not unduly influence Blake Carlisle into any conduct or action. Blake Carlisle was an adult, of sound-mind, possessing independent decision-making faculties, and in all other ways appeared to be a mature adult. The fact that Archer provided compensation to participants does not render the relationship unbalanced or one where undue influence was present. Plenty of people are compensated for participation in various seminars, studies, tests, etc. I do not believe the financial component was enough, separately or jointly, to overwhelm Blake's cognitive functioning. The amount of alcohol in the DownRide beverage was not sufficient to have any cognitive effect. Even taking the potential for cumulative effects, in my opinion and assessment of the substance testing results, alcohol was not a factor in any impairment or mental limitation.

CONCLUSION

I submit this conclusion based on a reasonable degree of medical and investigation certainty and, while subject to change as discovery continues, Decedent Blake Carlisle died from their failure to operate a motor vehicle safely. No one else was in the vehicle with Blake in the moments prior to the accident. The evidence shows Decedent was a bit unsteady around the time they left the DeGray property, but nothing indicates Decedent was assisted with walking to or getting into their vehicle. Also, the amount of time between leaving the DeGray property and vehicle accident, approximately one hour later, supports the conclusion that Decedent was able to operate the vehicle safely prior to the accident.

The reference to Icarus Complex by Palmer Echols is nothing more than a failed attempt to tie a psychological concept to a fact pattern that does not support the diagnosis. Archer DeGray was never clinically evaluated, and all of the information offered by Palmer Echols in support is circumstantial, at most. There is no direct evidence that Archer DeGray acted or was motivated in any manner consistent with that complex. In my opinion, Archer DeGray possessed indicators closer to a dissociative disorder. I suspect there was significant childhood trauma and family dynamics that conditioned Archer to act toward self-preservation, rather than with any intent to harm others.

The substances in the "RC Ride Challenge" beverages did not have the effects that Palmer Echols' opinion assumes and supposes in an effort to justify the unfounded conclusion. There is no evidence that any participants were experiencing physical illness. Most importantly, other than the testimony on a brief encounter between Archer and Blake prior to Blake leaving, there is absolutely nothing to support cognitive impairment. I do not dispute the ingredients and volumes supposedly consumed by Blake were significant, but every single person processes those kinds of substances differently. Other participants completed the challenge, and presumably consumed the same type and number of beverages as Blake, without any reported problems. The connection between the RC Ride Challenge beverages and the accident is unsubstantiated. No causal connection exists between any action of Defendant and the Decedent's accident.

This report is submitted this 21st day of June, 2023.

Dallas Exeter

Dallas Exeter