

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

**TERRY HOBBS,
Plaintiff,**

v.

**NATALIE PASDAR, et al.,
Defendants.**

CV NO.: 4-09-CV-0008BSM

DECLARATION OF PAMELA MARIE HOBBS

I, Pamela Marie Hobbs, declare as follows:

1. "My name is Pamela Marie Hobbs. I am over the age of 21 and competent to give this declaration.
2. All of the information set forth herein is within my personal knowledge and is true and correct.
3. On May 6, 1993, the police found three little boys, Steve Branch ("Stevie"), Christopher Byers and Michael Moore, murdered in Robin Hood Hills (the "Murders").
 - A. I am the mother of Steven Branch, one of the boys killed in the Robin Hood Hills Murders which occurred on or about May 5, 1993.
5. At the time of the Murders, I was married to Terry Hobbs, the plaintiff in the lawsuit entitled *Terry Hobbs v. Natalie Pasdar, et al.*, CV No.: 4-09-CV008BSM. I was married to Terry Hobbs from 1986 until 2004. When I married Terry, my son Stevie, from my prior marriage to Steve Allen Branch, was approximately one and one-half (1½) years old. Later, in 1989, Terry and I had a daughter, Amanda Hobbs ("Amanda").

6. Throughout the time I have known Terry, he has had a bad reputation and character. Specifically, he is known to me and my family to have very poor character and reputation, and in the West Memphis, Memphis and Crittendon County area I believe he is generally known to have a bad reputation and low character. The following events which I describe below are only some examples of Terry's activities which reflect upon his character and reputation.

7. During our marriage, Terry was a regular user of drugs. He frequently smoked marijuana in our home and out of the house. He also used crystal methamphetamine and cocaine.

8. Terry was violent and he hit me twice. In 1999, Terry and I got into an argument. I insinuated that Terry had a girlfriend. As I attempted to leave the house to get away from Terry and just drive around to cool off, Terry fought me for the car keys. When he couldn't get the keys, Terry hit me in the face with a closed fist. I was truly hurt, and was worried that he had broken my jaw because he had hit me so hard. I called my family, and I talked to my brother, Kevin Hicks. I asked him what a broken jaw felt like. My brother and parents immediately came to check on me. I told Terry my family was coming to take care of me and I believed that Terry would leave the house. Instead, Terry waited outside for them, sitting on the tailgate of his truck.

9. When my family arrived, there was a fight between Terry and my brother, Jackie Hicks, Jr. As they were fighting, Terry pulled out a gun and shot Jackie in the abdomen. He was moving to again shoot Jackie and my father started walking toward Terry. At that point, Terry pointed the gun at my dad and said "You'd better not go any farther; I'll shoot you, too, you fat motherfucker." My father, Jackie Hicks Sr. was able to grab the gun from Terry's hands. My brother was severely injured as a result of the gunshot. He had to have over ten surgeries. The doctors first decided to leave the bullet where it was lodged because they thought it would kill him to remove it, but later it caused a bowel obstruction, so they removed the bullet. After that surgery to remove the bullet, Jackie developed a blood clot and died from an aneurysm.

10. Terry would frequently hit the kids with a belt. He would make them hold up their hands in the air as he whipped them. Sometimes when he whipped Stevie he would leave belt marks on him.

11. Stevie and Terry did not have a good relationship. Stevie had a journal that he had

been writing in at school before he died. On the back of the journal Stevie had written, "Stevie, Sr. is my real dad." In fact, approximately three days before Stevie's death, Stevie asked me to leave Terry.

12. In contrast, Terry was very close to Amanda and favored her. He was protective of her but not close to Stevie. Terry acted like he resented Stevie or considered him a rival.

13. Terry did not grieve for Stevie when Stevie was murdered. In fact, he did not seem to be affected by Stevie's death at all.

14. Two weeks after Stevie died, Terry left town. Terry left me in Blytheville, Arkansas and moved to Hardy, Arkansas. He said I was too much to handle and that he could not stay around me anymore.

15. I had Terry Hobbs' name removed from Stevie's gravestone.

16. Many people were very kind and generous to me and my family following Stevie's death. When money started coming in to our family from strangers trying to help, Terry always took any money allotted to our family. I do not know what he used the money for.

17. Terry has also mistreated our daughter, Amanda. In 1993, when Amanda was 4 years old, my sister, Jo Lynn McCaughey, told me that Amanda had told her that Terry had put his finger into Amanda's "booty."

18. I took Amanda to the hospital in Blytheville, Arkansas, so a doctor could do a physical examination. That doctor told me that Amanda had been vaginally penetrated and that she had a yeast infection.

19. In approximately 2002, when Amanda was older, approximately 13 years old, and developing into a young woman, she told Jo Lynn (and Jo Lynn told me) that Terry grabbed her breasts. This revelation caused me great concern because it was the second time Amanda had said that Terry had sexually molested her.

20. As a result and because I was concerned about Amanda, I asked Amanda whether Terry had actually grabbed her breasts. Amanda told me that yes, it was true, Terry had grabbed her breasts.

21. Terry has been violent and abusive to people outside my family as well. Prior to our marriage, Terry was married to Angela Timms. I saw the divorce papers in which Angela accused Terry of sexually molesting their son, Bryan Hobbs.

22. Terry has tried to take Stevie's old possessions - the only things I have left of Stevie, really - from me. In 2004, Jo Lynn and I went to see a Billy Ray Cyrus concert. Terry showed up. I got my picture taken with Billy Ray Cyrus. The next day John Walsh, of *America's Most Wanted*, was at the casino and Terry and I were able to see Mr. Walsh, to speak to him and to tell him that he was an inspiration to victims like me. John Walsh had featured Stevie's case on *America's Most Wanted*, and he told me that I was a lady with a lot of courage and that I should not give up.

23. The next day Terry said to me, "I'm glad I'm from the mountains." He said he was glad he was from the mountains because he could tell the difference between a slut (he said slut or whore, I cannot remember which) and a lady. It was clear to me that Terry was calling me a whore or a slut, just because I had talked to John Walsh.

24. When Amanda and I returned there was a note on the door from Terry that said something like, "I'm gone for the weekend and don't come back because I won't be back until then." Amanda was able to get in the house through the back door. When she got inside she saw that Terry was there. He hadn't left or gone anywhere.

25. Amanda let me into the house. Terry was angry and we began to fight. Amanda and I left and I asked the police to come with us to get our things so we could move out. Amanda was aware that her father, Terry, used drugs, and she told the police that her father did drugs. Amanda told the police officers that Terry did cocaine and he did crystal methamphetamine. The police asked her, "Do you know where he keeps his drugs?" When we got back to the house, Amanda went back into the bedroom and found marijuana and a white powder.

26. When the police escorted me into the house, the first thing I went to look for was the little suitcase that had belonged to Stevie which Stevie had labeled "My Ninja Stuff: Do Not Touch." Stevie's suitcase was not where I kept it. I asked Terry where the suitcase was. He said he did not know. The police officers told Terry that if he knew where the suitcase was and where Stevie's things were and that they wanted him to go and get them. One police officer took Terry out to his vehicle and had him open the trunk. Everything of Stevie's, including the suitcase, was in the trunk of Terry's

car.

27. At some point after our divorce in 2004, I did return to Memphis to live with Terry and Amanda, because Terry was allowing a twenty-one-year-old man to live with Amanda, who was only fifteen. I felt like I was going to lose Amanda as well as Stevie, so I went back to Memphis and lived with Terry and Amanda for another fifteen months or so, so that I could be around my daughter and try to protect her.

For all of the reasons I stated above, I believe it is possible that Terry was involved in the murders of Stevie, Christopher and Michael."

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in Mississippi County, Arkansas.

Dated: 5/20/09

By: Pamela Marie Hobbs (signature)

Pamela Marie Hobbs