

STATE OF KENTUCKY:

S. C. T.

COUNTY OF FLOYD:

The affiant, Lula Viers, says that on the 9th day of December, 1915, there was being tried in the Floyd Circuit Court an Indictment wherein the Commonwealth of Kentucky was plaintiff and John Coyer was defendant, charging the said John Coyer with the seduction of this affiant, Lula Viers; that Ham Clark was called as a witness for the defense in said action and introduced by them, and was sworn as such witness in the manner provided by law; that the said Ham Clark stated, during the course of his examination as such witness, and while under oath as such witness, that he had carnal sexual intercourse with this affiant under the river bank at Auxier, Floyd county, Kentucky, prior to the time the said John Coyer was accused of having seduced this affiant.

This affiant says that said statement by said Ham Clark was false and untrue, and was known by said Ham Clark to be false and untrue at the time he made said statement while under oath, and that in making said statement, he, the said Ham Clark, willfully, and knowingly swore, deposed and gave in evidence that which is false.

Subscribed and sworn to before me by Lula Viers this
the , day of December, A. D., 1915.
