

No. _____

THE STATE OF TEXAS

VS



COMPLAINT

SALE, DISTRIBUTION, OR DISPLAY OF HARMFUL MATERIAL TO MINOR (3F) x6

37990004; Texas Penal Code Ann. 43.24

FILED

The ____ day of ____ 2023

EARL "DUB" GILLUM

JUSTICE OF THE PEACE

Hood County, Texas

Precinct 4

STATE'S WITNESS

Scott M. London

COMPLAINT NO. _____

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF TEXAS

I, Scott M. London (Affiant), being duly sworn, do state upon my oath that I have good reason to believe and do believe based on the following information:

1. That I, Scott M. London, am a certified peace officer under the laws of the State of Texas, employed as a Chief Deputy Constable for the Hood County Constable's Office, Pct 4.
2. I am in possession of an offense report (H220000337) prepared by Chief Deputy Scott M. London, who was a certified peace officer under the laws of the State of Texas and was employed by the Hood County Constable's Office, Pct 4 at the time of the report.
3. The report states the following:
 - a) On 2 May 2022, Deputy London initiated an investigation into the allegation that there were books in the Granbury ISD Libraries that were harmful to minors, as defined by Texas Penal Code 43.24(a)(2)(A, B and C).
 - b) [REDACTED] was employed as the librarian for [REDACTED] School for the 2021-2022 school year.
 - c) [REDACTED] School has approximately 2000 students in grades [REDACTED]. The typical age range for [REDACTED] school student is between [REDACTED] years old.
 - d) [REDACTED] School is located in Hood County, Texas.
 - e) On November 1, 2021, Governor Greg Abbott published a letter to Dr. Troxell, the executive director of the Texas Association of School Boards (TASB). In it he says, "Texas public schools should not provide or promote pornographic or obscene material to students." The letter goes on to say, "your organization's members [Texas independent school districts] have an obligation to determine the extent to which such materials exist or are used in our schools and to remove any such content."
 - f) On February 1, 2022, Granbury ISD hosted a Library Review Committee meeting. The committee was made up of Granbury ISD employees and Granbury community members. According to their agenda, some of the topics of that meeting included:

"Purpose of Committee
*Letters from Gov. Abbott
*Definition and scope of review: written or visual material that depicts explicit sexual acts or overtly sexual content"
 - g) According to Jeremy Glenn, the Granbury ISD Superintendent, librarians up to the 2021-2022 school year were responsible for the procurement of books for the

libraries for their respective schools. This was confirmed by [REDACTED] who was a Granbury ISD Principal at the time Deputy London spoke with him.

- h) According to Jeremy Glenn, student aids that are utilized in the school library would assist librarians with duties such as putting books back on the shelves after they've been checked in, etcetera.
- i) Books in the school library are available for the school students to check out.
- j) According to records obtained by Deputy London, Granbury [REDACTED] Library had at least one copy of each of the following books in their library during the 2021-2022 school year:
 - 1. A COURT OF THORNS AND ROSES by Sarah Maas [AMB];
 - 2. A COURT OF MIST AND FURY by Sarah Maas [GMA];
 - 3. A COURT OF WINGS AND RUIN by Sarah Maas [HSB];
 - 4. THE BLUEST EYE by Toni Morrison [HSA];
 - 5. GONE. A TEACHER. A STUDENT. CROSSING THE LINE. by Kathleen Jeffie Johnson [HSC]; and
 - 6. FADE by Lisa Mcmann [GMB].
- k) The following is a description of each book, a description of the excerpts from each book, along with sample quotes from the excerpts:

1. A COURT OF THORNS AND ROSES by Sarah Maas [AMB];
A COURT OF THORNS AND ROSES is the first book in a series that seems to be set in a medieval fantasy era with mortal humans and faeries of varied powers and status. The main characters are Feyre, a 19-year-old hunter who finds herself indentured to Tamlin, the shape shifting high lord of the Spring Court whose beastly state is described as: as large as a horse; his body somewhat feline; his head distinctly wolfish; with curled elk-like horns. While in his human-like state, Tamlin's claws often protrude or extend out of the top of his knuckles, much like Wolverine in the X-Men series. Other characters include Rhysand (Rhys), the high lord of the Night Court, and Amaranatha, the high queen who plots to control all the courts of Prythian, including the mortal realm.

Excerpt AMB1, pg 195-197: During an impassioned encounter between Tamlin and Feyre, Feyre describes her defiant reactions and lustful body responses to Tamlin's forceful advances.

"His bite lightened, and his tongue caressed the places his teeth had been. He didn't move – he just remained in that spot, kissing my neck. Intently, territorially, lazily. Heat pounded between my legs, and as he ground his body against me, against every aching spot, a moan slipped past my lips." pg 197

Excerpt AMB2, pg 231-232: Tamlin and Feyre briefly reminisce about the previous night's kiss which results in Feyre's lustful desire.

"“Are you sure?” he murmured, intent and hungry enough that I was glad I was sitting. He could have had me right there, on top of the table. I wanted his broad hands running over my bare skin, wanted his teeth scraping against my neck, wanted his mouth all over me.” pg 232

Excerpt AMB3, pg 245-247: Feyre tells of her sexual encounter with Tamlin the night before she is to go back to the mortal realm.

“His claws were out, but devastatingly gentle on my hips as he slid down between my thighs and feasted on me, stopping only after I shuttered and fractured. I was moaning his name when he sheathed himself inside me in a powerful, slow thrust that had me splintering around him.” pg 247

Excerpt AMB4, pg 346-348: A captive of Amaranatha, and indebted to Rhysand, Feyre is stripped down by two of Rhys’ minions, bathed roughly, then her body is painted entirely and adorned with a revealing gauze prior being paraded in before all at a party in Amaranatha’s throne room.

“The faeries brought me up through dusty stairwells and down forgotten halls until we reached a nondescript room where they stripped me naked, bathed me roughly, and then – to my horror – began to paint my body.” pg 346

“The sounds of merriment rose ahead of us, and my face burned as I silently bemoaned the too-sheer fabric of my dress. Beneath it, my breasts were visible to everyone, the paint hardly leaving anything to the imagination, ...” pg 348

Excerpt AMB5, pg 411-412: As the only means of saving Feyre’s life, she is turned into an immortal. She delays addressing anything else until “later” opting for a sexual encounter with Tamlin.

“He eased me onto the bed, murmuring my name against my neck, the shell of my ear, the tips of my fingers. I urged him – faster, harder. His mouth explored the curve of my breast, the inside of my thigh.” pg 412

2. A COURT OF MIST AND FURY by Sarah Maas [GMA];

A COURT OF MIST AND FURY is the second book in the series that seems to be set in a medieval fantasy era with mortal humans and faeries of varied powers and status. The main character is Feyre, a young woman who, at the end of the last book, died and became an immortal when she was revived by the all the high lords of the various fae courts of Prythian. After some obligated visits to Rhysand (Rhys), she ends up leaving Tamlin (her betrothed) at the altar to be in the Night Court where Rhysand is the high lord. During their quest to prepare for battle with the King of Hybern, Feyre discovers she is mated (predestined to be an intimate partner with) to Rhysand.

Excerpt GMA1, pg 21-24: After a long day, as Feyre is wondering how things will be after their wedding, Tamlin comes to her bed. Her wondering thoughts and their conversations are intermingled with the description of the sexual encounter they are having.

“Tamlin let out a low snarl of approval, and I bit my bottom lip as he removed his pants, along with his undergarments, revealing the proud, thick length of him. My mouth went dry, and I dragged my gaze up his muscled torso, over the panes of his chest, and then—” pg 21

“His tongue swept my mouth again, in time to his finger that he slipped inside of me. My hips undulated, demanding more, craving the fullness of him, and his growl reverberated in my chest as he added another finger.” pg 22

“His fingers slid into me again, and he growled in approval at the wetness between my thighs, both from me and him. “They won’t,” he said against my skin, positioning himself over me again and sliding down my body, trailing kisses as he went.” pg 24

Excerpt GMA2, pg 368: Feyre feels torn between the love she had for Tamlin and the flirtations she’s having with Rhysand. She describes how she could have imagined an encounter with Rhys would have progressed in what was described like a lingerie store.

“And he would have looked at me the entire time – at my breasts, visible through the lace; at the plane of my stomach, now finally looking less starved and taut. At the sweep of my hips and thighs – between them.” pg 368

Excerpt GMA3, pg 405: Feyre described the risqué attire she wore on an outing to the Court of Nightmares, similar to what she was made to wear in Excerpt AMB4.

“The two shafts of fabric that hardly covered my breasts flowed to below my navel, where a belt across my hips joined them into one long shaft that draped between my legs and barely covered my backside.” pg 405

Excerpt GMA4, pg 409-416: This excerpt gives the sensual physical interactions between Feyre and Rhys, Feyre’s lustful thoughts, and the secret mind-to-mind (a psychic connection) conversation that Feyre and Rhys are having about what is happening between them while in front of the people/creatures of the Court of Nightmares, all while Rhysand is interacting with a member of the Court.

“His hand slid up my upper thigh, fingers curving in.

I ground against him, trying to shift those hands away from what he’d learn—

To find him hard against my backside.

Every thought eddied from my head. Only a thrill of power remained as I writhed along that impressive length. Rhys let out a low, rough laugh.” pg 415

Excerpt GMA5, pg 471-475: In cramped overnight lodging, Feyre and Rhysand resorted to sharing a bed. Cold from their day’s adventures, the cuddled for body heat. Rhysand even covered them with his wing. The cuddling quickly became a sexual encounter.

“Something hard pressed against my behind. Heat flooded me, and I went taut and loose all at once. I stroked his wing again, two fingers now, and he twitched against my backside in time with the caress.” pg 471-472

“He slipped his hand beneath the top of my sweater, diving clean under my shirt. Skin to skin, the calluses of his hands made me groan as they scraped the top of my breast and circled around my peaked nipple. “I love these,” he breathed on my neck, his hand sliding to my other breast. “You have no idea how much I love these.”” pg 472

“His hand at last trailed beneath my pants. The first brush of him against me dragged a groan from deep in my throat.

He snarled in satisfaction at the wetness he found waiting for him, and his thumb circled that spot at the apex of my thighs, teasing, brushing up against it, but never quite—

His other hand squeezed my breast at the same moment his thumb pushed down exactly where I wanted. I bucked my hips, my head fully back against his shoulder now, panting as his thumb flicked—

I cried out, and he laughed, low and soft. “Like that?”

A moan was my only reply. *More, more, more.*” pg 473

“I let out a moan so loud it drowned out the rain as he slid in a second finger, filling me so much I couldn’t think around it, couldn’t breathe. “That’s it,” he murmured, his lips tracing my ear.

I was sick of my neck and ear getting such attention. I twisted as much as I could, and found him staring at me, at the hand down the front of my pants, watching me move on him.

He was still staring at me when I captured his mouth with my own, biting his lower lip.

Rhys groaned, plunging his finger deeper. Harder.

I didn't care – I didn't care one bit about what I was and who I was and where I'd been as I yielded fully to him, opening my mouth. His tongue swept in, moving in a way that I knew exactly what he'd do if he got between my legs.

His fingers plunged in and out, slow and hard, and my very existence narrowed to the feel of them, to the tightness in me ratcheting up with every deep stroke, every echoing thrust of his tongue in my mouth.” pg 474

“I was instantly liquid again, and he laughed under his breath. “And when I lick *you*,” he said sliding his arms around me and tucking me in tight to him, “I want you splayed out on a table like my own personal feast.” pg 475

Excerpt GMA6, pg 530-533: Feyre has accepted that she is “mated” to Rhysand and

indicated to Rhysand that she agrees to be mated to him, they have their first sexual encounter as “mates”.

“Rhys pulled back to survey me, my body naked from the waist up. Paint soaked into my hair, my arms. But all I could think of was his mouth as it lowered to my breast and sucked, his tongue flicked against my nipple.” pg 530

The first lick of Rhysand's tongue set me on fire.

I want you splayed out on the table like my own personal feast.

He growled his approval at my moan, my taste, and unleashed himself on me entirely.

A hand pinning my hips to the table, he worked me in great sweeping strokes. And when his tongue slid inside me, I reached up to grip the edge of the table, to grip the edge of the world that I was very near to falling off.

He licked and kissed his way to the apex of my thighs, just as his fingers replaced where his mouth had been, pumping inside me as he sucked, his teeth scraping ever so slightly—” pg 531

“Wholly naked, I watched as he unbuttoned his pants, and the considerable length of him sprang free. My mouth went dry at the sight of it. I wanted him, wanted every glorious inch of him in me, wanted to claw at him until our souls were forged together.

He didn't say anything as he came over me, wings tucked in tight. He'd never gone to bed with a female while his wings were out. But I was his mate. He would yield only for me.

And I wanted to touch him.

I leaned up, reaching over his shoulder to caress the powerful curve of his wing.

Rhys shuttered, and I watched his cock twitch.” pg 532

“Rhys laughed in a way that skittered along my bones, and slid in. And in. And in.

I could hardly breathe, hardly think beyond where our bodies were joined. He stilled inside me, letting me adjust, and I opened my eyes to find him staring down at me. “Say it again,” he murmured.

I knew what he meant.

“You're mine,” I breathed.

Rhys pulled out slightly and thrust back in slowly. So torturously slow.

“You're mine,” I gasped out.

Again, he pulled out, then thrust in.

“You're mine.”

Again – faster, deeper this time.” pg 535

Excerpt GMA7, pg 534 & 537: Nude and covered in paint, Rhys and Feyre bathe together. “I laughed, and the glow flared a little brighter. He leaned in, kissing me softly, and I melted for him, wrapping my arms around his neck. He was rock-hard against me, pushing against where I sat poised right above him. All it would take would be one smooth motion and he be inside me— ” pg 537

Excerpt GMA8, pg 538-541: Following the bath, they return to bed for another round of sex.

“He was enormous in my hand – so hard, yet so silken that I just ran a finger down him in wonder. He hissed, cock twitching as I brushed my thumb over the tip. I smirked and did it again.” pg 538

“One second he was in my mouth, my tongue flicking over the broad head of him, the next, his hands were on my waist and I was being flipped onto my front. He nudged my legs apart with his knees, spreading me as he gripped my hips, tugging them up, up before he sheathed himself deep in me with a single stroke.” pg 539

““I want to stay in that bedroom and fuck you until we’re both hoarse.”” pg 541

Excerpt GMA9, pg 545: Rhys and Feyre have a quickie (brief sexual encounter).

“Cassian and Mor instantly found somewhere else to be, and Rhys didn’t bother taking my clothes all the way off before he bent me over the kitchen table and made me moan his name loud enough for the Illyrians still circling high above to hear.” pg 545

3. A COURT OF WINGS AND RUIN by Sarah Maas [HSB];

A COURT OF WINGS AND RUIN is the third book in the series that seems to be set in a medieval fantasy era with mortal humans and faeries of varied powers and status. The main character is Feyre, a human who became immortal in the first book. She and her mate, Rhysand (Rhys), High Lord of the Night Court, prepare to save all of Prythian (all the fae courts and the human territory below the wall) from the King of Hybern and his ultimate weapon, the Cauldron. Other characters also include: Tamlin, Feyre’s former fiancé and High Lord of the Spring Court; Lucien, Tamlin’s emissary and youngest son of the High Lord of the Autumn Court; Casian; one of Rhysand’s generals; Azriel, Rhysand’s spymaster; Morgan (Mor), Rhysand’s cousin; and Helion, High Lord of the Day Court.

Excerpt HSB1, pg 135-142: A graphic description of a sexual encounter between Feyre and Rhysand when she returns home after escaping the Spring Court with the aid of Lucien.

“Carefully, lovingly, he laid our joined hands beside my head as he guided himself into me and whispered in my ear, “You’re mine, too.”

At the first nudge of him, I surged forward to claim his mouth.

I dragged my tongue over his teeth, swallowing his grown of pleasure as his hips rolled in gentle thrusts and he pushed in, and in, and in.” pg 141

Excerpt HSB2, pg 198: Just before battle training with Cassian, Feyre recalls the oral sex performed on her by Rhysand the night before.

“I rolled my eyes, even as I tried to shut out the image Rhysand laying me on my stomach, then kissing his way down my spine. Lower. Tried to shut out the feeling of his strong hands gripping my hips and lifting them up, up, until he lay beneath them and feasted on me, until I was quietly begging him and he rose behind me and I had to bite my pillow to keep from waking the whole house with my moaning.” pg 198

Excerpt HSB3, pg 218-219: While in the library, Rhysand and Feyre hide between some bookcases for a quick sexual encounter, but the foreplay is cut short when Rhysand winnows away (a magical power used to transport himself from one location to another).

“His hand began a lethal, taunting exploration up my thigh, his fingers grazing along the sensitive inside. Higher, higher. He leaned in to drag a book toward himself, but whispered in my ear, “Or maybe I’ll spread you out on this desk and lick you until you scream loud enough to wake whatever is at the bottom of the library.” pg 218

“Rhys leaned in again, kissing my neck – that place right under my ear – and said against my skin, “Let’s see what names you call me when my head is between your legs, Feyre darling.” pg 219

Excerpt HSB4, pg 261: As Rhysand and Feyre are preparing to return to the Court of Nightmares, they flirtatiously recall the prior visit when Rhys publicly groped and fondled Feyre.

“I rose from the bench, facing him fully. His hands skimmed the bear skin along my ribs. Between my breasts. Down the outside of my thighs. Oh, he remembered, too.” pg 261

Excerpt HSB5, pg 311-312: Since becoming immortal, Feyre now has the ability to shape shift and sprout and retract wings. This and the ability to fly on those wings, however, still require strength and training. Feyre was exhausted after a long day of flight training. After undressing Feyre and helping her into and subsequently out of the bath, Rhys gives Feyre a rubdown that quickly become sensual and he performs digital and oral sex on Feyre.

““ Will it ever stop?” He mused, more to himself than me as another finger joined the other one sliding in and out me with taunting, indolent strokes. Wanting you – every hour, every breath I don’t think I can stand a thousand years of this.” My hips moved with him, driving him deeper. “Think of how my productivity will plummet.”

I growled something at him that was likely *not* very romantic, and he chuckled, slipping out both fingers. I made a little whining noise of protest.

Until his mouth replaced where his fingers had been, his hands gripping my hips to raise me up, to lend him better access as he feasted on me. I groaned, the sound muffled by the pillow, and he only delved deeper, taunting and teasing every stroke.” pg 312

Excerpt HSB6, pg 379-380: In their tent at a war-camp, Feyre pleasures Rhysand by “worshipping” him with her hands and her mouth and then her body.

“Lower. Rhys hands slid into my hair as the rest of his clothes vanished.

I stroked my hand over him once, twice – luxuriating in the feel of him, and knowing he was here, we were *both* here. Safe.

Then I echoed the movement with my mouth.

His growls of pleasure filled the tent, ” pg 380

Excerpt HSB7, pg 450-451: Helion, the High Lord of the Day Court reminds Azriel, Cassion and Mor of the offer to join him in bed. Rys then explains to Feyre that he favors both male and female, preferably at the same time, in his bed. Then Rys offered to bring another male to bed with he and Feyre.

“The three of them in bed ... with him? I must have been blinking like a fool because Rhys said to me, *Helion favors both males and females. Usually together in his bed. And has been pounding after that trio for centuries.*

I considered – Helion’s beauty and the others ... *Why the hell haven’t they said yes?*

Rhys barked a laugh that had all of them looking at him with raised brows.

My mate just came up behind me and slid his arms around my waist, pressing a kiss to my neck. *Would you like someone to join us in bed, Feyre darling?*

My skin stretched tight over my bones at the tone, the suggestion. *You’re incorrigible.*

I think you’d like two males worshiping you.

My toes curled.” pg 450-451

Excerpt HSB8, pg 516: Restless after a long day of battle, Rhys and Feyre engage in a brief sexual encounter.

“Our joining was fast, and hard, and I was clawing at his back before the end shattered both of us, dragging my hands over his wings.

For long minutes afterward, we remain there, my legs over his shoulders, the rise and fall of his chest pushing into mine in a lingering echo of our bodies’ movements.

Then he withdrew, gently lowering my legs from his shoulders. He kiss the inside of each of my knees as he did so, setting them on either side of him as he rose up and kneeled before me.” pg 516

4. THE BLUEST EYE by Toni Morrison [HSA];

THE BLUES EYE is a story primarily told from the perspective of Claudia, a 9-year-old black girl in 1941. The other main characters include Pecola, the 11-year-old black girl who was fostered by Claudia’s parents [Pecola wished her eyes were blue so she could be pretty (The book’s namesake)]; Frieda, Claudia’s 10-year-old sister; Pauline (AKA Mrs. Breadlove), Pecola’s mother; Cholly, Pecola’s father; and Soaphead Church, the dream interpreter who turned Pecola’s eyes blue.

Excerpt HSA1, pg 5 & 6: In the introduction, the incest that comes up later in the book is forecast.

“We thought, at the time, that it was because Pecola was having her father’s baby that the marigolds did not grow.” pg 5

Excerpt HSA2, pg 84-85: Talks about how the kids know not to come around when men are having sex with “this plane brown girl”

“But the men do not know these things. Nor do they know that she will give him her body sparingly and partially. He must enter her surreptitiously, lifting the hem of her nightgown only to her navel. He must rest his weight on his elbows when they make love, ostensibly to avoid hurting her breasts but actually to keep her from having to touch or feel too much of him.” pg 84

Excerpt HSA3, pg 129-131: Pauline gives a firsthand account of what sex used to be like with Cholly.

“Then I don’t want his hand between my legs no more, because I think I am softening away. I stretch my legs open, and he is on top of me. Too heavy to hold, and too light not to. He puts his thing in me. In me. In me. I wrapped my feet around his back so he can’t get away. His face is next to mine. The bed springs sounds like them crickets use to back home.” pg 130

Excerpt HSA4, pg 139: As a boy, Cholly had a dream of being masturbated by an elderly midwife.

“He was aware, in his sleep, of being curled up in a chair, his hands tucked between his thighs. In a dream his penis changed into a long hickory stick, and the hands caressing it were the hands of M’Dear.” pg 139

Excerpt HSA5, pg 146-149: A 13-year-old Cholly lost his virginity. While he and the girl are having sex, they are caught by two white men. Cholly is then forced at gunpoint to continue having sex with the girl.

“She corkscrewing her hands into his clothes. He returning the play, digging into the neck of her dress, and then under her dress. When he got his hand in her bloomers, she suddenly stopped laughing and looked serious. Cholly, frightened, was about to take his hand away, but she held his wrist so he couldn’t move it. He examined her then with his fingers, and she kissed his face and mouth. Cholly found her muscadine-lipped mouth distracting. Darlene released his head, shifting her body, and pulled down her pants. After some trouble with the buttons, Cholly dropped his pants down to his knees. Their bodies began to make sense to him, and it was not as difficult as he had thought it would be. She moaned a little, but the excitement collecting inside him made him close his eyes and regard’s her moans is no more than pine sighs over his head.” pg 147

Excerpt HSA6, pg 161-163: Cholly rapes Pecola, his 11-year-old daughter.

“The tenderness welled up in him, he sank to his knees, his eyes on the foot of his daughter. Crawling on all fours toward her, he raised his hand and caught the foot in an upward stroke. Pecola lost her balance and was about to careen to the floor. Cholly raised his other hand to her hips to save her from falling. He put his head down and nibbled the back of her leg. His mouth trembled at the firm sweetness of flesh. He closed his eyes, letting his fingers dig into her waist. The rigidity of her shocked body, the silence of her stunned throat, was better than Pauline’s easy laughter had been. The confused mixture of his memories of Pauline and the doing of a wild and forbidden thing excited him, and a bolt of desire ran down his genitals, giving it length, and softening the lips of his anus. Surrounding all of this lust was a border of politeness. He wanted to fuck her – tenderly. But the tenderness would not hold. The tightness of her vagina was more than he could bear. His soul seemed to slip down to his guts fly out into her, and the gigantic thrust he made into her then provoked the only sound she made – a hollow suck of air in the back of her throat. Like the rapid loss of air from a circus balloon.”

...

“Removing himself from her was so painful to him he cut short and snatched genitals out of the dry harbor of her vagina.” pg 162-163

Excerpt HSA7, pg 166 & 167: In the character introduction of Soaphead, the rationale for his predilection to pedophilia is given.

“He could have been an active homosexual but lacked the courage. Bestiality did not occur to him, and sodomy was quite out of the question, for he did not experience sustained erections and could not endure the thought of somebody else’s. And besides, the one thing that disgusts him more than entering and caressing a woman was caressing and being caressed by a man. In any case, his cravings, although intense, never relished physical contact.” ... “His attentions therefore gradually settled on those humans whose bodies were least offensive – children. And since he was too diffident to confront homosexuality, and since little boys were insulting, scary, and stubborn, he further limited his interests to little girls. They were usually manageable and frequently seductive. His sexuality was anything but lewd; his patronage of little girls smacked of innocence and was

associated in his mind with cleanliness. He was what one might call a very clean old man.” pg 166-167

Excerpt HSA8, pg 178-181; In a letter to God, Soaphead confesses, describes, justifies, and laments the only thing he will miss in death: his pedophilia.

“You remember, do you, how and what we are made? Let me tell you now about the breasts of little girls. I apologize for the inappropriateness (is that it?), the imbalance of loving them at awkward times of the day, and in awkward places, and the tastelessness of loving those which belonged to members of my family. Do I have to apologize for loving strangers?

But you too are amiss here, Lord. How, why, did you allow it to happen? How is it I could lift my eyes from the contemplation of Your Body and fall deeply into the contemplation of theirs? The buds. The buds on some of these saplings. They were mean, you know, mean and tender. Mean little buds resisting the touch, springing like rubber. But aggressive. Daring me to touch. Commanding me to touch. Not a bit shy, as you’d suppose. They stuck out at me, oh yes, at me. Slender-chested, finger-chested lassies. Have you ever seen them, Lord? I mean, really seen them? One could not see them and not love them. You who made them must have considered them lovely even as an idea – how much more lovely is the manifestation of that idea. I couldn’t, as you must recall, keep my hands, my mouth, off them. Salt-sweet. Like not quite ripe strawberries covered with the light salt sweat of running days and hopping, skipping, jumping hours.

The love of them – the touch, taste, and feel of them – was not just an easy luxurious human vice; they were, for me, A Thing To Do Instead.” pg 178-179

“Why do I have to die? The little girls. The little girls are the only thing I’ll miss. Do you know that when I touched their sturdy little tits and bit them – just a little – I felt I was being friendly? I didn’t want to kiss their mouths or sleep in the bed with them or take a child bride for my own. Playful, I felt, and friendly.” pg 181

5. GONE. by Kathleen Jeffie Johnson [HSC];

GONE. A TEACHER. A STUDENT. CROSSING THE LINE. is a story set in the summer after Connor (age 17) graduated from high school. He has a brief fling with Corinna Timms (age 31), his history teacher. She moves across the country, and he follows her, but does not find her. Other characters include Connor’s friend, Zach, and Zach’s first girlfriend, Risa.

Excerpt HSC1, pg 76: Laying in bed naked, Connor masturbates to the thought of Corinna.

“Connor lay across his bed, letting the hot, humid air sliding in through the window lick his skin. *Corrina*. His privates contracted pleasantly. Closing his eyes, he caressed himself lightly, his mouth going wet with her taste. He gripped himself harder, feeling her slippery tongue in his mouth” pg 76

Excerpt HSC2, pg 92-93: At the birthday party for Connor’s aunt, Corinna and Connor go to the garage. Upon entering the garage, Corinna grabs Connor, pushes him against the wall and begins kissing him. They undress each other and she performs oral sex on him.

“She stepped farther inside, and he followed. Pushing the door shut, she grabbed him, whirling him against the wall, into the shadows, out of sight of everyone else’s eyes.

“Damn, I missed you,” she whispered.

Her mouth was on his, hungry, wet, insistent, tasting of crabs, of Old Bay spice, of sweetness, of beer. Stunned, he froze, not able to move – then she rubbed against him, *there*, and he exploded in a frenzy, pushing his tongue in her mouth as far as he could, his hands grabbing, clutching, his pelvis grinding into hers. As her hands dove under his shirt, pushing it up, pulling it off, his hands scrambled with hers, stumbling stupidly with her bra, yanking it down, her shirt gone—

Then her tongue was everywhere, in his ear, down his throat, her pelvis rubbing against his, tiny gasps and bleats coming from her mouth, her entire body pushing, pounding, smashing his – then a high, elongated gasp, a deep shudder, followed by a hot, sticky thundercloud of silence, a moment extended impossibility into the distance, leaving him throbbing, aching, it was unbearable, he couldn't stand it, he had to—

Her hand slid down his shorts, climbing beneath his underwear, pushing both down, and then *Jesus!* He was in her mouth, hard, slippery, wet, he was there, right there – *oh!* – exploding, his body banging against the wall, his legs shaking, his hands tangled in her hair—

Then she was holding him up, both of them pressed to the wall, sweaty, trembling—

Naked.” pg 92-93

Excerpt HSC3, pg 99: Zach confesses to Connor an incident where Risa's bra came undone, and Zach had a premature ejaculation in his underwear.

““Well, we weren't going to do anything, we were just *there*. You know, sightseeing. Except, we did do something, only not *that*, but – well, her bra kind of came undone, and I was so freaking excited that I blew it right there in my damned underwear. It was two seconds of Mt. Vesuvius, and then phiff!” pg 99

Excerpt HSC4, pg 103: Topless, Corinna wakes Connor up after having fallen asleep in the back seat of her car.

“His eyes still shut, Connor smelled her before he saw her, smelled her musky, honey-flavored skin, her beer-scented breath. He smiled, reaching for her softness, the slender framework of her bones, nuzzling the sweet space between her breasts.” pg 103

Excerpt HSC5, pg 124: Connor remembers the intimate night with Corinna.

“Connor tried to focus on the night with Corinna, remembering the weight of her legs splayed across his, the smell of her sweat blended with his to form a musky perfume.” pg 124

Excerpt HSC6, Pg 130-132: Naked and falling out of bed, Connor and Corinna play and flirt, amidst other conversation.

“Laying on top of him, Corinna giggled helplessly, her body shaking, her breasts pressed against his chest.” pg 130

Connor, also cross-legged, his knees just barely touched hers, had to concentrate on not looking at her gorgeous breasts, not looking at the warm, dark place between her legs.” pg 131

Laughing, she leaned her head against his and looked down. “We've got company, mon capitain.”

“What—?” He moaned as her hand slid down to his privates.

“I want to play a different game,” she murmured, gently pushing him down on the rug.” pg 132

6. FADE by Lisa Mcmann [GMB];

FADE is a story of Janie and Cabel, two high school seniors who are working “under-cover” for the police. Due to their work for the police, they must keep their romantic relationship a secret. Having already informed on a drug dealer in the fall semester, they are now working in their final semester to discover which teacher may be raping students. Janie adds great value to the investigations with her ability to go into the dreams of others. Janie ends up using herself as bait to catch her chemistry teacher Mr. Durbin, and ultimately is critical in busting Mr. Durbin, Mr. Wang (her psychology teacher) and Coach Crater (her PE coach) at a party where they provide alcohol, marijuana, and surreptitiously date rape drugs to about 20 students.

Excerpt GMB1, pg 100-102: Staying at Cabel’s house, Janie and Cabel have sex for the first time.

“She reaches between her breasts and unhooks her bra.

And then she turns her face slowly toward him. “Cabel?” She looks into his eyes.

“Yes,” he whispers. He can barely get the word out.

“I want you to touch me,” she says, taking his hand and guiding it.

“Okay?”

“Oh god.”

She pulls a newly purchased condom from her pocket.

Sets the package on the skin of her belly.

Reaches for his jeans.

Cabel, momentarily rendered speechless, helpless, and thoughtless except for wanting her, sighs in shudders as he touches her skin, her breasts, her thighs, and then, as the light fades from the window, they are kissing as if their lives depended on their shared breath, and urgently making love for the first time, with their eyes and bodies, like it’s the only chance they’ll ever have.” pg 101-102

Excerpt GMB2, pg 126-127: While Janie is in Cabel’s dream, observing it, she is aware that his actual body becomes aroused and begins to stroke her numbing body while he’s dreaming.

“Cabel takes in a sharp breath, and she can feel him against her backside, aroused in his sleep. He begins to stroke her numbing body while he’s still in the dream. She can feel his touch, fading in and out on her skin, as she’s seeing it in his mind. And she’s stuck. And falling. And very aroused and blind and numb and watching it in her mind while feeling it on her body, all at the same time, and she wants it. Wants to make love right now. But she is completely paralyzed.” pg 126-127

Excerpt GMB3, pg 131: While in Mr. Durbin’s house, Janie notices a porn magazine on his bedside table.

Excerpt GMB4, pg 133-135: during a tutoring session at Mr. Durbin’s house, he touches Janie inappropriately, but also talks about how, as long as she’s a student, a relationship would be inappropriate, but it would be okay once she graduates.

“He takes the paper and slips it under her notebook, brushing her breast with his forearm. Both pretend not to notice.” pg 133

Excerpt GMB5, pg 144: Janie is in the dream of a classmate, Lauren, observing. She watches Lauren dance, when a man joins her. He removes her clothes and shoves his pants to the floor before pushing her to the floor and falling on top of her.

“Lauren dances in the center of a circle. Her shirt is off and she twirls it as she stumbles around, laughing, wearing just a black bra and jeans.

Someone joins her.

He strips his shirt off and grabs Lauren.

Everyone claps and cheers as the guy pulls Lauren to him. They kiss and grind as the music pounds in the background.

Hip-hop music.

Janie watches in horror as the guy removes Lauren’s clothing and shoves his jeans down to his knees. The guy pushes Lauren to the floor, falling on top of her, their drinks spilling everywhere, and the rest of the group begins making out and tearing off one another’s clothes. Then they pile up on top of Lauren until people are stacked to the ceiling. Lauren is screaming, muffled. She’s being crushed to death.” pg 144

Excerpt GMB6, pg 180-190: A variety of events that occur at the party hosted at Mr.

Durbin’s house where Mr. Wang (Chris), and Coach Crater are also in attendance with about 20 students: which includes “students in various stages of pre-sex”; teachers kissing and fondling students; etc.

“Students are sprawled around the room, sitting on one another’s laps, making out. A few are sitting alone, a vacant, dazed look on their faces. And in the middle of the room, where everyone else’s eyes are riveted, Mr. Wang and Stacey O’Grady are dirty dancing. Very dirty. Mr. Wang’s shirt is off, and his muscles bulge and shine with sweat. Janie’s eyes wonder over his body, and she is surprised to find him suddenly, strangely, attractive.” pg 180

““Hey,” she says turning back to Mr. Durbin. “Wasn’t Stacey here? Before?”

She’s still here, Janie.” His words are deliberate, like he’s concentrating. “She’s fucking Chris in the other bedroom, so we can fuck in here.” pg 184

AND I CHARGE THAT HERETOFORE, AND BEFORE THE MAKING AND FILING OF THIS COMPLAINT ON OR ABOUT THE 2ND DAY OF MAY 2022, IN THE COUNTY OF HOOD AND STATE OF TEXAS, [REDACTED] DEFENDANT, THEN AND THERE INTENTIONALLY AND KNOWINGLY POSSESSED FOR SALE, DISTRIBUTION, OR EXHIBITION TO #1 THE [REDACTED] SCHOOL STUDENT BODY, A COLLECTION OF APPROXIMATELY 2000 INDIVIDUALS WHO WAS THEN AND THERE YOUNGER THAN 18 YEARS OF AGE, HARMFUL MATERIAL, NAMELY #2 SPECIFICALLY, #2.1 A COURT OF THORNS AND ROSES BY SARAH MAAS; #2.2 A COURT OF MIST AND FURY BY SARAH MAAS; #2.3 A COURT OF WINGS AND RUIN BY SARAH MAAS; #2.4 THE BLUEST EYE BY TONI MORRISON; #2.5 GONE. A TEACHER. A STUDENT. CROSSING THE LINE. BY KATHLEEN JEFFIE JOHNSON; AND #2.6 FADE BY LISA MCMANN, AND THE DEFENDANT POSSESSED THE MATERIAL KNOWING THAT IT WAS HARMFUL AND KNOWING THAT THE STUDENTS WERE INDIVIDUALS, THE VAST MAGORITY OF WHICH WERE YOUNGER THAN 18 YEARS OF AGE. #3 AND DID HIRE, EMPLOY, OR USE A MINOR(S) TO DO OR ACCOMPLISH OR ASSIST IN DOING OR ACCOMPLISHING THE AFORE MENTIONED ACT(S).

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Complainant

SWORN TO AND SUBSCRIBED BEFORE ME BY Scott M. London, a credible person, this
_____ day of _____ 2022.

JUSTICE OF THE PEACE, HOOD COUNTY
Precinct 4

Prosecution [] approved [] declined

DISTRICT ATTORNEY'S OFFICE
355TH DISTRICT OF TEXAS

DATE

No. _____

THE STATE OF TEXAS

VS



COMPLAINT

SALE, DISTRIBUTION, OR DISPLAY OF HARMFUL MATERIAL TO MINOR (3F) x4

37990004; Texas Penal Code Ann. 43.24

FILED

The ____ day of ____ 2023

EARL "DUB" GILLUM

JUSTICE OF THE PEACE

Hood County, Texas

Precinct 4

STATE'S WITNESS

Scott M. London

COMPLAINT NO. _____

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF TEXAS

I, Scott M. London (Affiant), being duly sworn, do state upon my oath that I have good reason to believe and do believe based on the following information:

1. That I, Scott M. London, am a certified peace officer under the laws of the State of Texas, employed as a Chief Deputy Constable for the Hood County Constable's Office, Pct 4.
2. I am in possession of an offense report (H220000337) prepared by Chief Deputy Scott M. London, who was a certified peace officer under the laws of the State of Texas and was employed by the Hood County Constable's Office, Pct 4 at the time of the report.
3. The report states the following:
 - a) On 2 May 2022, Deputy London initiated an investigation into the allegation that there were books in the Granbury ISD Libraries that were harmful to minors, as defined by Texas Penal Code 43.24(a)(2)(A, B and C).
 - b) [REDACTED] was employed as the librarian for [REDACTED] School for the 2021-2022 school year.
 - c) [REDACTED] School has approximately 800 students in grades 6, 7, and 8. The typical age range for a middle school student is between 11-13 years old.
 - d) [REDACTED] School is located in Hood County, Texas.
 - e) On November 1, 2021, Governor Greg Abbott published a letter to Dr. Troxell, the executive director of the Texas Association of School Boards (TASB). In it he says, "Texas public schools should not provide or promote pornographic or obscene material to students." The letter goes on to say, "your organization's members [Texas independent school districts] have an obligation to determine the extent to which such materials exist or are used in our schools and to remove any such content."
 - f) On February 1, 2022 Granbury ISD hosted a Library Review Committee meeting. The committee was made up of Granbury ISD employees and Granbury community members. According to their agenda, some of the topics of that meeting included:

"Purpose of Committee
*Letters from Gov. Abbott
*Definition and scope of review: written or visual material that depicts explicit sexual acts or overtly sexual content"
 - g) According to Jeremy Glenn, the Granbury ISD Superintendent, librarians up to the 2021-2022 school year were responsible for the procurement of books for the libraries for their respective schools. This was confirmed by [REDACTED] who was a Granbury ISD Principal at the time Deputy London spoke with him.

- h) According to Jeremy Glenn, student aids that are utilized in the school library would assist librarians with duties such as putting books back on the shelves after they've been checked in, etcetera.
- i) Books in the school library are available for the school students to check out.
- j) According to records obtained by Deputy London, Granbury [REDACTED] Library had at least one copy of each of the following books in their library during the 2021-2022 school year:
 - 1. A COURT OF THORNS AND ROSES by Sarah Maas [AMB];
 - 2. A COURT OF MIST AND FURY by Sarah Maas [GMA];
 - 3. GONE. A TEACHER. A STUDENT. CROSSING THE LINE. by Kathleen Jeffie Johnson [HSC]; and
 - 4. FADE by Lisa Mcmann [GMB].
- k) The following is a description of each book, a description of the excerpts from each book, along with sample quotes from the excerpts:

1. A COURT OF THORNS AND ROSES by Sarah Maas [AMB];

A COURT OF THORNS AND ROSES is the first book in a series that seems to be set in a medieval fantasy era with mortal humans and faeries of varied powers and status. The main characters are Feyre, a 19-year-old hunter who finds herself indentured to Tamlin, the shape shifting high lord of the Spring Court whose beastly state is described as: as large as a horse; his body somewhat feline; his head distinctly wolfish; with curled elk-like horns. While in his human-like state, Tamlin's claws often protrude or extend out of the top of his knuckles, much like Wolverine in the X-Men series. Other characters include Rhysand (Rhys), the high lord of the Night Court, and Amaranatha, the high queen who plots to control all the courts of Prythian, including the mortal realm.

Excerpt AMB1, pg 195-197: During an impassioned encounter between Tamlin and Feyre, Feyre describes her defiant reactions and lustful body responses to Tamlin's forceful advances.

"His bite lightened, and his tongue caressed the places his teeth had been. He didn't move – he just remained in that spot, kissing my neck. Intently, territorially, lazily. Heat pounded between my legs, and as he ground his body against me, against every aching spot, a moan slipped past my lips." pg 197

Excerpt AMB2, pg 231-232: Tamlin and Feyre briefly reminisce about the previous night's kiss which results in Feyre's lustful desire.

"“Are you sure?” he murmured, intent and hungry enough that I was glad I was sitting. He could have had me right there, on top of the table. I wanted his broad hands running over my bare skin, wanted his teeth scraping against my neck, wanted his mouth all over me.” pg 232

Excerpt AMB3, pg 245-247: Feyre tells of her sexual encounter with Tamlin the night before she is to go back to the mortal realm.

"His claws were out, but devastatingly gentle on my hips as he slid down between my thighs and feasted on me, stopping only after I shuttered and fractured. I was moaning his name when he sheathed himself inside me in a powerful, slow thrust that had me splintering around him." pg 247

Excerpt AMB4, pg 346-348: A captive of Amaranatha, and indebted to Rhysand, Feyre is stripped down by two of Rhys' minions, bathed roughly, then her body is

painted entirely and adorned with a revealing gauze prior being paraded in before all at a party in Amaranatha's throne room.

"The faeries brought me up through dusty stairwells and down forgotten halls until we reached a nondescript room where they stripped me naked, bathed me roughly, and then – to my horror – began to paint my body." pg 346

"The sounds of merriment rose ahead of us, and my face burned as I silently bemoaned the too-sheer fabric of my dress. Beneath it, my breasts were visible to everyone, the paint hardly leaving anything to the imagination, ..." pg 348

Excerpt AMB5, pg 411-412: As the only means of saving Feyre's life, she is turned into an immortal. She delays addressing anything else until "later" opting for a sexual encounter with Tamlin.

"He eased me onto the bed, murmuring my name against my neck, the shell of my ear, the tips of my fingers. I urged him – faster, harder. His mouth explored the curve of my breast, the inside of my thigh." pg 412

2. A COURT OF MIST AND FURY by Sarah Maas [GMA];

A COURT OF MIST AND FURY is the second book in the series that seems to be set in a medieval fantasy era with mortal humans and faeries of varied powers and status. The main character is Feyre, a young woman who, at the end of the last book, died and became an immortal when she was revived by the all the high lords of the various fae courts of Prythian. After some obligated visits to Rhysand (Rhys), she ends up leaving Tamlin (her betrothed) at the alter to be in the Night Court where Rhysand is the high lord. During their quest to prepare for battle with the King of Hybern, Feyre discovers she is mated (predestined to be an intimate partner with) to Rhysand.

Excerpt GMA1, pg 21-24: After a long day, as Feyre is wondering how things will be after their wedding, Tamlin comes to her bed. Her wondering thoughts and their conversations are intermingled with the description of the sexual encounter they are having.

"Tamlin let out a low snarl of approval, and I bit my bottom lip as he removed his pants, along with his undergarments, revealing the proud, thick length of him. My mouth went dry, and I dragged my gaze up his muscled torso, over the panes of his chest, and then—" pg 21

"His tongue swept my mouth again, in time to his finger that he slipped inside of me. My hips undulated, demanding more, craving the fullness of him, and his growl reverberated in my chest as he added another finger." pg 22

"His fingers slid into me again, and he growled in approval at the wetness between my thighs, both from me and him. "They won't," he said against my skin, positioning himself over me again and sliding down my body, trailing kisses as he went." pg 24

Excerpt GMA2, pg 368: Feyre feels torn between the love she had for Tamlin and the flirtations she's having with Rhysand. She describes how she could have imagined an encounter with Rhys would have progressed in what was described like a lingerie store.

"And he would have looked at me the entire time – at my breasts, visible through the lace; at the plane of my stomach, now finally looking less starved and taut. At the sweep of my hips and thighs – between them." pg 368

Excerpt GMA3, pg 405: Feyre described the risqué attire she wore on an outing to the Court of Nightmares, similar to what she was made to wear in Excerpt AMB4.

“The two shafts of fabric that hardly covered my breasts flowed to below my navel, where a belt across my hips joined them into one long shaft that draped between my legs and barely covered my backside.” pg 405

Excerpt GMA4, pg 409-416: This excerpt gives the sensual physical interactions between Feyre and Rhys, Feyre’s lustful thoughts, and the secret mind-to-mind (a psychic connection) conversation that Feyre and Rhys are having about what is happening between them while in front of the people/creatures of the Court of Nightmares, all while Rhysand is interacting with a member of the Court.

“His hand slid up my upper thigh, fingers curving in.

I ground against him, trying to shift those hands away from what he’d learn—

To find him hard against my backside.

Every thought eddied from my head. Only a thrill of power remained as I writhed along that impressive length. Rhys let out a low, rough laugh.” pg 415

Excerpt GMA5, pg 471-475: In cramped overnight lodging, Feyre and Rhysand resorted to sharing a bed. Cold from their day’s adventures, the cuddled for body heat. Rhysand even covered them with his wing. The cuddling quickly became a sexual encounter.

“Something hard pressed against my behind. Heat flooded me, and I went taut and loose all at once. I stroked his wing again, two fingers now, and he twitched against my backside in time with the caress.” pg 471-472

“He slipped his hand beneath the top of my sweater, diving clean under my shirt. Skin to skin, the calluses of his hands made me groan as they scraped the top of my breast and circled around my peaked nipple. “I love these,” he breathed on my neck, his hand sliding to my other breast. “You have no idea how much I love these.”” pg 472

“His hand at last trailed beneath my pants. The first brush of him against me dragged a groan from deep in my throat.

He snarled in satisfaction at the wetness he found waiting for him, and his thumb circled that spot at the apex of my thighs, teasing, brushing up against it, but never quite—

His other hand squeezed my breast at the same moment his thumb pushed down exactly where I wanted. I bucked my hips, my head fully back against his shoulder now, panting as his thumb flicked—

I cried out, and he laughed, low and soft. “Like that?”

A moan was my only reply. *More, more, more.*” pg 473

“I let out a moan so loud it drowned out the rain as he slid in a second finger, filling me so much I couldn’t think around it, couldn’t breathe. “That’s it,” he murmured, his lips tracing my ear.

I was sick of my neck and ear getting such attention. I twisted as much as I could, and found him staring at me, at the hand down the front of my pants, watching me move on him.

He was still staring at me when I captured his mouth with my own, biting his lower lip.

Rhys groaned, plunging his finger deeper. Harder.

I didn’t care – I didn’t care one bit about what I was and who I was and where I’d been as I yielded fully to him, opening my mouth. His tongue swept in, moving in a way that I knew exactly what he’d do if he got between my legs.

His fingers plunged in and out, slow and hard, and my very existence narrowed to the feel of them, to the tightness in me ratcheting up with every deep stroke, every echoing thrust of his tongue in my mouth.” pg 474

“I was instantly liquid again, and he laughed under his breath. “And when I lick *you*,” he said sliding his arms around me and tucking me in tight to him, “I want you splayed out on a table like my own personal feast.” pg 475

Excerpt GMA6, pg 530-533: Feyre has accepted that she is “mated” to Rhysand and indicated to Rhysand that she agrees to be mated to him, they have their first sexual encounter as “mates”.

“Rhys pulled back to survey me, my body naked from the waist up. Paint soaked into my hair, my arms. But all I could think of was his mouth as it lowered to my breast and sucked, his tongue flicked against my nipple.” pg 530

The first lick of Rhysand’s tongue set me on fire.

I want you splayed out on the table like my own personal feast.

He growled his approval at my moan, my taste, and unleashed himself on me entirely.

A hand pinning my hips to the table, he worked me in great sweeping strokes. And when his tongue slid inside me, I reached up to grip the edge of the table, to grip the edge of the world that I was very near to falling off.

He licked and kissed his way to the apex of my thighs, just as his fingers replaced where his mouth had been, pumping inside me as he sucked, his teeth scraping ever so slightly—” pg 531

“Wholly naked, I watched as he unbuttoned his pants, and the considerable length of him sprang free. My mouth went dry at the sight of it. I wanted him, wanted every glorious inch of him in me, wanted to claw at him until our souls were forged together.

He didn’t say anything as he came over me, wings tucked in tight. He’d never gone to bed with a female while his wings were out. But I was his mate. He would yield only for me.

And I wanted to touch him.

I leaned up, reaching over his shoulder to caress the powerful curve of his wing.

Rhys shuttered, and I watched his cock twitch.” pg 532

“Rhys laughed in a way that skittered along my bones, and slid in. And in. And in.

I could hardly breathe, hardly think beyond where our bodies were joined. He stilled inside me, letting me adjust, and I opened my eyes to find him staring down at me. “Say it again,” he murmured.

I knew what he meant.

“You’re mine,” I breathed.

Rhys pulled out slightly and thrust back in slowly. So torturously slow.

“You’re mine,” I gasped out.

Again, he pulled out, then thrust in.

“You’re mine.”

Again – faster, deeper this time.” pg 535

Excerpt GMA7, pg 534 & 537: Nude and covered in paint, Rhys and Feyre bathe together.

“I laughed, and the glow flared a little brighter. He leaned in, kissing me softly, and I melted for him, wrapping my arms around his neck. He was rock-hard against me, pushing against where I sat poised right above him. All it would take would be one smooth motion and he be inside me— ” pg 537

Excerpt GMA8, pg 538-541: Following the bath, they return to bed for another round of sex.

“He was enormous in my hand – so hard, yet so silken that I just ran a finger down him in wonder. He hissed, cock twitching as I brushed my thumb over the tip. I smirked and did it again.” pg 538

“One second he was in my mouth, my tongue flicking over the broad head of him, the next, his hands were on my waist and I was being flipped onto my front. He nudged my legs apart with his knees, spreading me as he gripped my hips, tugging them up, up before he sheathed himself deep in me with a single stroke.” pg 539

““I want to stay in that bedroom and fuck you until we’re both hoarse.””
pg 541

Excerpt GMA9, pg 545: Rhys and Feyre have a quickie (brief sexual encounter).

“Cassian and Mor instantly found somewhere else to be, and Rhys didn’t bother taking my clothes all the way off before he bent me over the kitchen table and made me moan his name loud enough for the Illyrians still circling high above to hear.” pg 545

3. GONE, by Kathleen Jeffie Johnson [HSC];

GONE. A TEACHER. A STUDENT. CROSSING THE LINE. is a story set in the summer after Connor (age 17) graduated from high school. He has a brief fling with Corinna Timms (age 31), his history teacher. She moves across the country, and he follows her, but does not find her. Other characters include Connor’s friend, Zach, and Zach’s first girlfriend, Risa.

Excerpt HSC1, pg 76: Laying in bed naked, Connor masturbates to the thought of Corinna.

“Connor lay across his bed, letting the hot, humid air sliding in through the window lick his skin. *Corrina*. His privates contracted pleasantly. Closing his eyes, he caressed himself lightly, his mouth going wet with her taste. He gripped himself harder, feeling her slippery tongue in his mouth” pg 76

Excerpt HSC2, pg 92-93: At the birthday party for Connor’s aunt, Corinna and Connor go to the garage. Upon entering the garage, Corinna grabs Connor, pushes him against the wall and begins kissing him. They undress each other and she performs oral sex on him.

“She stepped farther inside, and he followed. Pushing the door shut, she grabbed him, whirling him against the wall, into the shadows, out of sight of everyone else’s eyes.

“Damn, I missed you,” she whispered.

Her mouth was on his, hungry, wet, insistent, tasting of crabs, of Old Bay spice, of sweetness, of beer. Stunned, he froze, not able to move – then she rubbed against him, *there*, and he exploded in a frenzy, pushing his tongue in her mouth as far as he could, his hands grabbing, clutching, his pelvis grinding into hers. As her hands dove under his shirt, pushing it up, pulling it off, his hands scrambled with hers, stumbling stupidly with her bra, yanking it down, her shirt gone—

Then her tongue was everywhere, in his ear, down his throat, her pelvis rubbing against his, tiny gasps and bleats coming from her mouth, her entire body pushing, pounding, smashing his – then a high, elongated gasp, a deep shudder, followed by a hot, sticky thundercloud of silence, a moment extended impossibility into the distance, leaving him throbbing, aching, it was unbearable, he couldn’t stand it, he had to—

Her hand slid down his shorts, climbing beneath his underwear, pushing both down, and then *Jesus!* He was in her mouth, hard, slippery, wet, he was

there, right there – *oh!* – exploding, his body banging against the wall, his legs shaking, his hands tangled in her hair—

Then she was holding him up, both of them pressed to the wall, sweaty, trembling—

Naked.” pg 92-93

Excerpt HSC3, pg 99: Zach confesses to Connor an incident where Risa’s bra came undone, and Zach had a premature ejaculation in his underwear.

““Well, we weren’t going to do anything, we were just *there*. You know, sightseeing. Except, we did do something, only not *that*, but – well, her bra kind of came undone, and I was so freaking excited that I blew it right there in my damned underwear. It was two seconds of Mt. Vesuvius, and then phiff!” pg 99

Excerpt HSC4, pg 103: Topless, Corinna wakes Connor up after having fallen asleep in the back seat of her car.

“His eyes still shut, Connor smelled her before he saw her, smelled her musky, honey-flavored skin, her beer-scented breath. He smiled, reaching for her softness, the slender framework of her bones, nuzzling the sweet space between her breasts.” pg 103

Excerpt HSC5, pg 124: Connor remembers the intimate night with Corinna.

“Connor tried to focus on the night with Corrina, remembering the weight of her legs splayed across his, the smell of her sweat blended with his to form a musky perfume.” pg 124

Excerpt HSC6, Pg 130-132: Naked and falling out of bed, Connor and Corinna play and flirt, amidst other conversation.

“Laying on top of him, Corrina giggled helplessly, her body shaking, her breasts pressed against his chest.” pg 130

Connor, also cross-legged, his knees just barely touched hers, had to concentrate on not looking at her gorgeous breasts, not looking at the warm, dark place between her legs.” pg 131

Laughing, she leaned her head against his and looked down. “We’ve got company, mon capitain.”

“What—?” He moaned as her hand slid down to his privates.

“I want to play a different game,” she murmured, gently pushing him down on the rug.” pg 132

4. FADE by Lisa Mcmann [GMB];

FADE is a story of Janie and Cabel, two high school seniors who are working “under-cover” for the police. Due to their work for the police, they must keep their romantic relationship a secret. Having already informed on a drug dealer in the fall semester, they are now working in their final semester to discover which teacher may be raping students. Janie adds great value to the investigations with her ability to go into the dreams of others. Janie ends up using herself as bait to catch her chemistry teacher Mr. Durbin, and ultimately is critical in busting Mr. Durbin, Mr. Wang (her psychology teacher) and Coach Crater (her PE coach) at a party where they provide alcohol, marijuana, and surreptitiously date rape drugs to about 20 students.

Excerpt GMB1, pg 100-102: Staying at Cabel’s house, Janie and Cabel have sex for the first time.

“She reaches between her breasts and unhooks her bra.

And then she turns her face slowly toward him. “Cabel?” She looks into his eyes.

“Yes,” he whispers. He can barely get the word out.

“I want you to touch me,” she says, taking his hand and guiding it.
“Okay?”

“Oh god.”

She pulls a newly purchased condom from her pocket.

Sets the package on the skin of her belly.

Reaches for his jeans.

Cabel, momentarily rendered speechless, helpless, and thoughtless except for wanting her, sighs in shudders as he touches her skin, her breasts, her thighs, and then, as the light fades from the window, they are kissing as if their lives depended on their shared breath, and urgently making love for the first time, with their eyes and bodies, like it’s the only chance they’ll ever have.” pg 101-102

Excerpt GMB2, pg 126-127: While Janie is in Cabel’s dream, observing it, she is aware that his actual body becomes aroused and begins to stroke her numbing body while he’s dreaming.

“Cabel takes in a sharp breath, and she can feel him against her backside, aroused in his sleep. He begins to stroke her numbing body while he’s still in the dream. She can feel his touch, fading in and out on her skin, as she’s seeing it in his mind. And she’s stuck. And falling. And very aroused and blind and numb and watching it in her mind while feeling it on her body, all at the same time, and she wants it. Wants to make love right now. But she is completely paralyzed.” pg 126-127

Excerpt GMB3, pg 131: While in Mr. Durbin’s house, Janie notices a porn magazine on his bedside table.

Excerpt GMB4, pg 133-135: during a tutoring session at Mr. Durbin’s house, he touches Janie inappropriately, but also talks about how, as long as she’s a student, a relationship would be inappropriate, but it would be okay once she graduates.

“He takes the paper and slips it under her notebook, brushing her breast with his forearm. Both pretend not to notice.” pg 133

Excerpt GMB5, pg 144: Janie is in the dream of a classmate, Lauren, observing. She watches Lauren dance, when a man joins her. He removes her clothes and shoves his pants to the floor before pushing her to the floor and falling on top of her.

“Lauren dances in the center of a circle. Her shirt is off and she twirls it as she stumbles around, laughing, wearing just a black bra and jeans.

Someone joins her.

He strips his shirt off and grabs Lauren.

Everyone claps and cheers as the guy pulls Lauren to him. They kiss and grind as the music pounds in the background.

Hip-hop music.

Janie watches in horror as the guy removes Lauren’s clothing and shoves his jeans down to his knees. The guy pushes Lauren to the floor, falling on top of her, their drinks spilling everywhere, and the rest of the group begins making out and tearing off one another’s clothes. Then they pile up on top of Lauren until people are stacked to the ceiling. Lauren is screaming, muffled. She’s being crushed to death.” pg 144

Excerpt GMB6, pg 180-190: A variety of events that occur at the party hosted at Mr. Durbin’s house where Mr. Wang (Chris), and Coach Crater are also in attendance with about 20 students: which includes “students in various stages of pre-sex”; teachers kissing and fondling students; etc.

“Students are sprawled around the room, sitting on one another’s laps, making out. A few are sitting alone, a vacant, dazed look on their faces. And in the middle of the room, where everyone else’s eyes are riveted, Mr. Wang and Stacey O’Grady are dirty dancing. Very dirty. Mr. Wang’s shirt is off, and his muscles bulge and shine with sweat. Janie’s eyes wonder over his body, and she is surprised to find him suddenly, strangely, attractive.” pg 180

““Hey,” she says turning back to Mr. Durbin. “Wasn’t Stacey here? Before?”

She’s still here, Janie.” His words are deliberate, like he’s concentrating. “She’s fucking Chris in the other bedroom, so we can fuck in here.” pg 184

AND I CHARGE THAT HERETOFORE, AND BEFORE THE MAKING AND FILING OF THIS COMPLAINT ON OR ABOUT THE 2ND DAY OF MAY 2022, IN THE COUNTY OF HOOD AND STATE OF TEXAS, [REDACTED] DEFENDANT, THEN AND THERE INTENTIONALLY AND KNOWINGLY POSSESSED FOR SALE, DISTRIBUTION, OR EXHIBITION TO #1 THE [REDACTED] SCHOOL STUDENT BODY, A COLLECTION OF APPROXIMATELY 800 INDIVIDUALS WHO WAS THEN AND THERE YOUNGER THAN 18 YEARS OF AGE, HARMFUL MATERIAL, NAMELY #2 SPECIFICALLY, #2.1 *A COURT OF THORNS AND ROSES* BY SARAH MAAS; #2.2 *A COURT OF MIST AND FURY* BY SARAH MAAS; #2.3 *GONE. A TEACHER. A STUDENT. CROSSING THE LINE.* BY KATHLEEN JEFFIE JOHNSON; AND #2.4 *FADE* BY LISA MCMANN, AND THE DEFENDANT POSSESSED THE MATERIAL KNOWING THAT IT WAS HARMFUL AND KNOWING THAT THE STUDENTS WERE INDIVIDUALS, THE VAST MAGORITY OF WHICH WERE YOUNGER THAN 18 YEARS OF AGE. #3 AND DID HIRE, EMPLOY, OR USE A MINOR(S) TO DO OR ACCOMPLISH OR ASSIST IN DOING OR ACCOMPLISHING THE AFORE MENTIONED ACT(S).

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Complainant

SWORN TO AND SUBSCRIBED BEFORE ME BY Scott M. London, a credible person, this _____ day of _____ 2022.

JUSTICE OF THE PEACE, HOOD COUNTY
Precinct 4

Prosecution [] approved [] declined

DISTRICT ATTORNEY’S OFFICE
355TH DISTRICT OF TEXAS

DATE

No. _____

THE STATE OF TEXAS

VS



COMPLAINT

SALE, DISTRIBUTION, OR DISPLAY OF HARMFUL MATERIAL TO MINOR (3F) x4

37990004; Texas Penal Code Ann. 43.24

FILED

The ____ day of ____ 2023

EARL "DUB" GILLUM

JUSTICE OF THE PEACE

Hood County, Texas

Precinct 4

STATE'S WITNESS

Scott M. London

COMPLAINT NO. _____

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF TEXAS

I, Scott M. London (Affiant), being duly sworn, do state upon my oath that I have good reason to believe and do believe based on the following information:

1. That I, Scott M. London, am a certified peace officer under the laws of the State of Texas, employed as a Chief Deputy Constable for the Hood County Constable's Office, Pct 4.
2. I am in possession of an offense report (H220000337) prepared by Chief Deputy Scott M. London, who was a certified peace officer under the laws of the State of Texas and was employed by the Hood County Constable's Office, Pct 4 at the time of the report.
3. The report states the following:
 - a) On 2 May 2022, Deputy London initiated an investigation into the allegation that there were books in the Granbury ISD Libraries that were harmful to minors, as defined by Texas Penal Code 43.24(a)(2)(A, B and C).
 - b) [REDACTED] was employed as the librarian for [REDACTED] School for the 2021-2022 school year.
 - c) [REDACTED] School has approximately 900 students in grades 6, 7, and 8. The typical age range for a middle school student is between 11-13 years old.
 - d) [REDACTED] School is located in Hood County, Texas.
 - e) On November 1, 2021, Governor Greg Abbott published a letter to Dr. Troxell, the executive director of the Texas Association of School Boards (TASB). In it he says, "Texas public schools should not provide or promote pornographic or obscene material to students." The letter goes on to say, "your organization's members [Texas independent school districts] have an obligation to determine the extent to which such materials exist or are used in our schools and to remove any such content."
 - f) On February 1, 2022 Granbury ISD hosted a Library Review Committee meeting. The committee was made up of Granbury ISD employees and Granbury community members. According to their agenda, some of the topics of that meeting included:

"Purpose of Committee
*Letters from Gov. Abbott
*Definition and scope of review: written or visual material that depicts explicit sexual acts or overtly sexual content"
 - g) According to Jeremy Glenn, the Granbury ISD Superintendent, librarians up to the 2021-2022 school year were responsible for the procurement and placement of books for the libraries at their respective schools. This was confirmed by

██████████ who was a Granbury ISD Principal at the time Deputy London spoke with him.

- h) According to Jeremy Glenn, student aids that are utilized in the school libraries would assist librarians with duties such as putting books back on the shelves after they've been checked in, etcetera.
- i) Books in the school library are available for the school students to check out.
- j) According to records obtained by Deputy London, ██████████ School Library had at least one copy of each of the following books in their library during the 2021-2022 school year:
 - 1. A COURT OF THORNS AND ROSES by Sarah Maas [AMB];
 - 2. A COURT OF MIST AND FURY by Sarah Maas [GMA];
 - 3. A COURT OF WINGS AND RUIN by Sarah Maas [HSB]; and
 - 4. GONE. A TEACHER. A STUDENT. CROSSING THE LINE. by Kathleen Jeffie Johnson [HSC].
- k) The following is a description of each book, a description of the excerpts from each book, along with sample quotes from the excerpts:

1. A COURT OF THORNS AND ROSES by Sarah Maas [AMB];
A COURT OF THORNS AND ROSES is the first book in a series that seems to be set in a medieval fantasy era with mortal humans and faeries of varied powers and status. The main characters are Feyre, a 19-year-old hunter who finds herself indentured to Tamlin, the shape shifting high lord of the Spring Court whose beastly state is described as: as large as a horse; his body somewhat feline; his head distinctly wolfish; with curled elk-like horns. While in his human-like state, Tamlin's claws often protrude or extend out of the top of his knuckles, much like Wolverine in the X-Men series. Other characters include Rhysand (Rhys), the high lord of the Night Court, and Amaranatha, the high queen who plots to control all the courts of Prythian, including the mortal realm.

Excerpt AMB1, pg 195-197: During an impassioned encounter between Tamlin and Feyre, Feyre describes her defiant reactions and lustful body responses to Tamlin's forceful advances.

"His bite lightened, and his tongue caressed the places his teeth had been. He didn't move – he just remained in that spot, kissing my neck. Intently, territorially, lazily. Heat pounded between my legs, and as he ground his body against me, against every aching spot, a moan slipped past my lips." pg 197

Excerpt AMB2, pg 231-232: Tamlin and Feyre briefly reminisce about the previous night's kiss which results in Feyre's lustful desire.

"“Are you sure?” he murmured, intent and hungry enough that I was glad I was sitting. He could have had me right there, on top of the table. I wanted his broad hands running over my bare skin, wanted his teeth scraping against my neck, wanted his mouth all over me.” pg 232

Excerpt AMB3, pg 245-247: Feyre tells of her sexual encounter with Tamlin the night before she is to go back to the mortal realm.

"His claws were out, but devastatingly gentle on my hips as he slid down between my thighs and feasted on me, stopping only after I shuttered and fractured. I was moaning his name when he sheathed himself inside me in a powerful, slow thrust that had me splintering around him." pg 247

Excerpt AMB4, pg 346-348: A captive of Amaranatha, and indebted to Rhysand, Feyre is stripped down by two of Rhys' minions, bathed roughly, then her body is painted entirely and adorned with a revealing gauze prior being paraded in before all at a party in Amaranatha's throne room.

"The faeries brought me up through dusty stairwells and down forgotten halls until we reached a nondescript room where they stripped me naked, bathed me roughly, and then – to my horror – began to paint my body." pg 346

"The sounds of merriment rose ahead of us, and my face burned as I silently bemoaned the too-sheer fabric of my dress. Beneath it, my breasts were visible to everyone, the paint hardly leaving anything to the imagination, ..." pg 348

Excerpt AMB5, pg 411-412: As the only means of saving Feyre's life, she is turned into an immortal. She delays addressing anything else until "later" opting for a sexual encounter with Tamlin.

"He eased me onto the bed, murmuring my name against my neck, the shell of my ear, the tips of my fingers. I urged him – faster, harder. His mouth explored the curve of my breast, the inside of my thigh." pg 412

2. A COURT OF MIST AND FURY by Sarah Maas [GMA];

A COURT OF MIST AND FURY is the second book in the series that seems to be set in a medieval fantasy era with mortal humans and faeries of varied powers and status. The main character is Feyre, a young woman who, at the end of the last book, died and became an immortal when she was revived by the all the high lords of the various fae courts of Prythian. After some obligated visits to Rhysand (Rhys), she ends up leaving Tamlin (her betrothed) at the alter to be in the Night Court where Rhysand is the high lord. During their quest to prepare for battle with the King of Hybern, Feyre discovers she is mated (predestined to be an intimate partner with) to Rhysand.

Excerpt GMA1, pg 21-24: After a long day, as Feyre is wondering how things will be after their wedding, Tamlin comes to her bed. Her wondering thoughts and their conversations are intermingled with the description of the sexual encounter they are having.

"Tamlin let out a low snarl of approval, and I bit my bottom lip as he removed his pants, along with his undergarments, revealing the proud, thick length of him. My mouth went dry, and I dragged my gaze up his muscled torso, over the panes of his chest, and then—" pg 21

"His tongue swept my mouth again, in time to his finger that he slipped inside of me. My hips undulated, demanding more, craving the fullness of him, and his growl reverberated in my chest as he added another finger." pg 22

"His fingers slid into me again, and he growled in approval at the wetness between my thighs, both from me and him. "They won't," he said against my skin, positioning himself over me again and sliding down my body, trailing kisses as he went." pg 24

Excerpt GMA2, pg 368: Feyre feels torn between the love she had for Tamlin and the flirtations she's having with Rhysand. She describes how she could have imagined an encounter with Rhys would have progressed in what was described like a lingerie store.

"And he would have looked at me the entire time – at my breasts, visible through the lace; at the plane of my stomach, now finally looking less starved and taut. At the sweep of my hips and thighs – between them." pg 368

Excerpt GMA3, pg 405: Feyre described the risqué attire she wore on an outing to the Court of Nightmares, similar to what she was made to wear in Excerpt AMB4.

“The two shafts of fabric that hardly covered my breasts flowed to below my navel, where a belt across my hips joined them into one long shaft that draped between my legs and barely covered my backside.” pg 405

Excerpt GMA4, pg 409-416: This excerpt gives the sensual physical interactions between Feyre and Rhys, Feyre’s lustful thoughts, and the secret mind-to-mind (a psychic connection) conversation that Feyre and Rhys are having about what is happening between them while in front of the people/creatures of the Court of Nightmares, all while Rhysand is interacting with a member of the Court.

“His hand slid up my upper thigh, fingers curving in.

I ground against him, trying to shift those hands away from what he’d learn—

To find him hard against my backside.

Every thought eddied from my head. Only a thrill of power remained as I writhed along that impressive length. Rhys let out a low, rough laugh.” pg 415

Excerpt GMA5, pg 471-475: In cramped overnight lodging, Feyre and Rhysand resorted to sharing a bed. Cold from their day’s adventures, the cuddled for body heat. Rhysand even covered them with his wing. The cuddling quickly became a sexual encounter.

“Something hard pressed against my behind. Heat flooded me, and I went taut and loose all at once. I stroked his wing again, two fingers now, and he twitched against my backside in time with the caress.” pg 471-472

“He slipped his hand beneath the top of my sweater, diving clean under my shirt. Skin to skin, the calluses of his hands made me groan as they scraped the top of my breast and circled around my peaked nipple. “I love these,” he breathed on my neck, his hand sliding to my other breast. “You have no idea how much I love these.”” pg 472

“His hand at last trailed beneath my pants. The first brush of him against me dragged a groan from deep in my throat.

He snarled in satisfaction at the wetness he found waiting for him, and his thumb circled that spot at the apex of my thighs, teasing, brushing up against it, but never quite—

His other hand squeezed my breast at the same moment his thumb pushed down exactly where I wanted. I bucked my hips, my head fully back against his shoulder now, panting as his thumb flicked—

I cried out, and he laughed, low and soft. “Like that?”

A moan was my only reply. *More, more, more.*” pg 473

“I let out a moan so loud it drowned out the rain as he slid in a second finger, filling me so much I couldn’t think around it, couldn’t breathe. “That’s it,” he murmured, his lips tracing my ear.

I was sick of my neck and ear getting such attention. I twisted as much as I could, and found him staring at me, at the hand down the front of my pants, watching me move on him.

He was still staring at me when I captured his mouth with my own, biting his lower lip.

Rhys groaned, plunging his finger deeper. Harder.

I didn’t care – I didn’t care one bit about what I was and who I was and where I’d been as I yielded fully to him, opening my mouth. His tongue swept in, moving in a way that I knew exactly what he’d do if he got between my legs.

His fingers plunged in and out, slow and hard, and my very existence narrowed to the feel of them, to the tightness in me ratcheting up with every deep stroke, every echoing thrust of his tongue in my mouth.” pg 474

“I was instantly liquid again, and he laughed under his breath. “And when I lick *you*,” he said sliding his arms around me and tucking me in tight to him, “I want you splayed out on a table like my own personal feast.” pg 475

Excerpt GMA6, pg 530-533: Feyre has accepted that she is “mated” to Rhysand and indicated to Rhysand that she agrees to be mated to him, they have their first sexual encounter as “mates”.

“Rhys pulled back to survey me, my body naked from the waist up. Paint soaked into my hair, my arms. But all I could think of was his mouth as it lowered to my breast and sucked, his tongue flicked against my nipple.” pg 530

The first lick of Rhysand’s tongue set me on fire.

I want you splayed out on the table like my own personal feast.

He growled his approval at my moan, my taste, and unleashed himself on me entirely.

A hand pinning my hips to the table, he worked me in great sweeping strokes. And when his tongue slid inside me, I reached up to grip the edge of the table, to grip the edge of the world that I was very near to falling off.

He licked and kissed his way to the apex of my thighs, just as his fingers replaced where his mouth had been, pumping inside me as he sucked, his teeth scraping ever so slightly—” pg 531

“Wholly naked, I watched as he unbuttoned his pants, and the considerable length of him sprang free. My mouth went dry at the sight of it. I wanted him, wanted every glorious inch of him in me, wanted to claw at him until our souls were forged together.

He didn’t say anything as he came over me, wings tucked in tight. He’d never gone to bed with a female while his wings were out. But I was his mate. He would yield only for me.

And I wanted to touch him.

I leaned up, reaching over his shoulder to caress the powerful curve of his wing.

Rhys shuttered, and I watched his cock twitch.” pg 532

“Rhys laughed in a way that skittered along my bones, and slid in. And in. And in.

I could hardly breathe, hardly think beyond where our bodies were joined. He stilled inside me, letting me adjust, and I opened my eyes to find him staring down at me. “Say it again,” he murmured.

I knew what he meant.

“You’re mine,” I breathed.

Rhys pulled out slightly and thrust back in slowly. So torturously slow.

“You’re mine,” I gasped out.

Again, he pulled out, then thrust in.

“You’re mine.”

Again – faster, deeper this time.” pg 535

Excerpt GMA7, pg 534 & 537: Nude and covered in paint, Rhys and Feyre bathe together.

“I laughed, and the glow flared a little brighter. He leaned in, kissing me softly, and I melted for him, wrapping my arms around his neck. He was rock-hard against me, pushing against where I sat poised right above him. All it would take would be one smooth motion and he be inside me— ” pg 537

Excerpt GMA8, pg 538-541: Following the bath, they return to bed for another round of sex.

“He was enormous in my hand – so hard, yet so silken that I just ran a finger down him in wonder. He hissed, cock twitching as I brushed my thumb over the tip. I smirked and did it again.” pg 538

“One second he was in my mouth, my tongue flicking over the broad head of him, the next, his hands were on my waist and I was being flipped onto my front. He nudged my legs apart with his knees, spreading me as he gripped my hips, tugging them up, up before he sheathed himself deep in me with a single stroke.” pg 539

““I want to stay in that bedroom and fuck you until we’re both hoarse.””
pg 541

Excerpt GMA9, pg 545: Rhys and Feyre have a quickie (brief sexual encounter).

“Cassian and Mor instantly found somewhere else to be, and Rhys didn’t bother taking my clothes all the way off before he bent me over the kitchen table and made me moan his name loud enough for the Illyrians still circling high above to hear.” pg 545

3. A COURT OF WINGS AND RUIN by Sarah Maas [HSB];

A COURT OF WINGS AND RUIN is the third book in the series that seems to be set in a medieval fantasy era with mortal humans and faeries of varied powers and status. The main character is Feyre, a human who became immortal in the first book. She and her mate, Rhysand (Rhys), High Lord of the Night Court, prepare to save all of Prythian (all the fae courts and the human territory below the wall) from the King of Hybern and his ultimate weapon, the Cauldron. Other characters also include: Tamlin, Feyre’s former fiancé and High Lord of the Spring Court; Lucien, Tamlin’s emissary and youngest son of the High Lord of the Autumn Court; Casian; one of Rhysand’s generals; Azriel, Rhysand’s spymaster; Morgan (Mor), Rhysand’s cousin; and Helion, High Lord of the Day Court.

Excerpt HSB1, pg 135-142: A graphic description of a sexual encounter between Feyre and Rhysand when she returns home after escaping the Spring Court with the aid of Lucien.

“Carefully, lovingly, he laid our joined hands beside my head as he guided himself into me and whispered in my ear, “You’re mine, too.”

At the first nudge of him, I surged forward to claim his mouth.

I dragged my tongue over his teeth, swallowing his grown of pleasure as his hips rolled in gentle thrusts and he pushed in, and in, and in.” pg 141

Excerpt HSB2, pg 198: Just before battle training with Cassian, Feyre recalls the oral sex performed on her by Rhysand the night before.

“I rolled my eyes, even as I tried to shut out the image Rhysand laying me on my stomach, then kissing his way down my spine. Lower. Tried to shut out the feeling of his strong hands gripping my hips and lifting them up, up, until he lay beneath them and feasted on me, until I was quietly begging him and he rose behind me and I had to bite my pillow to keep from waking the whole house with my moaning.” pg 198

Excerpt HSB3, pg 218-219: While in the library, Rhysand and Feyre hide between some bookcases for a quick sexual encounter, but the foreplay is cut short when Rhysand winnows away (a magical power used to transport himself from one location to another).

“His hand began a lethal, taunting exploration up my thigh, his fingers grazing along the sensitive inside. Higher, higher. He leaned in to drag a book toward himself, but whispered in my ear, “Or maybe I’ll spread you out on this desk and

lick you until you scream loud enough to wake whatever is at the bottom of the library.” pg 218

“Rhys leaned in again, kissing my neck – that place right under my ear – and said against my skin, “Let’s see what names you call me when my head is between your legs, Feyre darling.” pg 219

Excerpt HSB4, pg 261: As Rhysand and Feyre are preparing to return to the Court of Nightmares, they flirtatiously recall the prior visit when Rhys publicly groped and fondled Feyre.

“I rose from the bench, facing him fully. His hands skimmed the bear skin along my ribs. Between my breasts. Down the outside of my thighs. Oh, he remembered, too.” pg 261

Excerpt HSB5, pg 311-312: Since becoming immortal, Feyre now has the ability to shape shift and sprout and retract wings. This and the ability to fly on those wings, however, still require strength and training. Feyre was exhausted after a long day of flight training. After undressing Feyre and helping her into and subsequently out of the bath, Rhys gives Feyre a rubdown that quickly become sensual and he performs digital and oral sex on Feyre.

““ Will it ever stop?” He mused, more to himself than me as another finger joined the other one sliding in and out me with taunting, indolent strokes. Wanting you – every hour, every breath I don’t think I can stand a thousand years of this.” My hips moved with him, driving him deeper. “Think of how my productivity will plummet.”

I growled something at him that was likely *not* very romantic, and he chuckled, slipping out both fingers. I made a little whining noise of protest.

Until his mouth replaced where his fingers had been, his hands gripping my hips to raise me up, to lend him better access as he feasted on me. I groaned, the sound muffled by the pillow, and he only delved deeper, taunting and teasing every stroke.” pg 312

Excerpt HSB6, pg 379-380: In their tent at a war-camp, Feyre pleasures Rhysand by “worshipping” him with her hands and her mouth and then her body.

“Lower. Rhys hands slid into my hair as the rest of his clothes vanished.

I stroked my hand over him once, twice – luxuriating in the feel of him, and knowing he was here, we were *both* here. Safe.

Then I echoed the movement with my mouth.

His growls of pleasure filled the tent, ” pg 380

Excerpt HSB7, pg 450-451: Helion, the High Lord of the Day Court reminds Azriel, Cassion and Mor of the offer to join him in bed. Rys then explains to Feyre that he favors both male and female, preferably at the same time, in his bed. Then Rys offered to bring another male to bed with he and Feyre.

“The three of them in bed ... with him? I must have been blinking like a fool because Rhys said to me, *Helion favors both males and females. Usually together in his bed. And has been pounding after that trio for centuries.*

I considered – Helion’s beauty and the others ... *Why the hell haven’t they said yes?*

Rhys barked a laugh that had all of them looking at him with raised brows.

My mate just came up behind me and slid his arms around my waist, pressing a kiss to my neck. *Would you like someone to join us in bed, Feyre darling?*

My skin stretched tight over my bones at the tone, the suggestion. *You’re incorrigible.*

I think you'd like two males worshipping you.

My toes curled.” pg 450-451

Excerpt HSB8, pg 516: Restless after a long day of battle, Rhys and Feyre engage in a brief sexual encounter.

“Our joining was fast, and hard, and I was clawing at his back before the end shattered both of us, dragging my hands over his wings.

For long minutes afterward, we remain there, my legs over his shoulders, the rise and fall of his chest pushing into mine in a lingering echo of our bodies’ movements.

Then he withdrew, gently lowering my legs from his shoulders. He kiss the inside of each of my knees as he did so, setting them on either side of him as he rose up and kneeled before me.” pg 516

4. GONE. by Kathleen Jeffie Johnson [HSC];

GONE. A TEACHER. A STUDENT. CROSSING THE LINE. is a story set in the summer after Connor (age 17) graduated from high school. He has a brief fling with Corinna Timms (age 31), his history teacher. She moves across the country, and he follows her, but does not find her. Other characters include Connor’s friend, Zach, and Zach’s first girlfriend, Risa.

Excerpt HSC1, pg 76: Laying in bed naked, Connor masturbates to the thought of Corinna.

“Connor lay across his bed, letting the hot, humid air sliding in through the window lick his skin. *Corrina*. His privates contracted pleasantly. Closing his eyes, he caressed himself lightly, his mouth going wet with her taste. He gripped himself harder, feeling her slippery tongue in his mouth” pg 76

Excerpt HSC2, pg 92-93: At the birthday party for Connor’s aunt, Corinna and Connor go to the garage. Upon entering the garage, Corinna grabs Connor, pushes him against the wall and begins kissing him. They undress each other and she performs oral sex on him.

“She stepped farther inside, and he followed. Pushing the door shut, she grabbed him, whirling him against the wall, into the shadows, out of sight of everyone else’s eyes.

“Damn, I missed you,” she whispered.

Her mouth was on his, hungry, wet, insistent, tasting of crabs, of Old Bay spice, of sweetness, of beer. Stunned, he froze, not able to move – then she rubbed against him, *there*, and he exploded in a frenzy, pushing his tongue in her mouth as far as he could, his hands grabbing, clutching, his pelvis grinding into hers. As her hands dove under his shirt, pushing it up, pulling it off, his hands scrambled with hers, stumbling stupidly with her bra, yanking it down, her shirt gone—

Then her tongue was everywhere, in his ear, down his throat, her pelvis rubbing against his, tiny gasps and bleats coming from her mouth, her entire body pushing, pounding, smashing his – then a high, elongated gasp, a deep shudder, followed by a hot, sticky thundercloud of silence, a moment extended impossibility into the distance, leaving him throbbing, aching, it was unbearable, he couldn’t stand it, he had to—

Her hand slid down his shorts, climbing beneath his underwear, pushing both down, and then *Jesus!* He was in her mouth, hard, slippery, wet, he was there, right there – *oh!* – exploding, his body banging against the wall, his legs shaking, his hands tangled in her hair—

Then she was holding him up, both of them pressed to the wall, sweaty, trembling—

Naked.” pg 92-93

Excerpt HSC3, pg 99: Zach confesses to Connor an incident where Risa's bra came undone, and Zach had a premature ejaculation in his underwear.

“Well, we weren't going to do anything, we were just *there*. You know, sightseeing. Except, we did do something, only not *that*, but – well, her bra kind of came undone, and I was so freaking excited that I blew it right there in my damned underwear. It was two seconds of Mt. Vesuvius, and then phiff!” pg 99

Excerpt HSC4, pg 103: Topless, Corinna wakes Connor up after having fallen asleep in the back seat of her car.

“His eyes still shut, Connor smelled her before he saw her, smelled her musky, honey-flavored skin, her beer-scented breath. He smiled, reaching for her softness, the slender framework of her bones, nuzzling the sweet space between her breasts.” pg 103

Excerpt HSC5, pg 124: Connor remembers the intimate night with Corinna.

“Connor tried to focus on the night with Corrina, remembering the weight of her legs splayed across his, the smell of her sweat blended with his to form a musky perfume.” pg 124

Excerpt HSC6, Pg 130-132: Naked and falling out of bed, Connor and Corinna play and flirt, amidst other conversation.

“Laying on top of him, Corrina giggled helplessly, her body shaking, her breasts pressed against his chest.” pg 130

Connor, also cross-legged, his knees just barely touched hers, had to concentrate on not looking at her gorgeous breasts, not looking at the warm, dark place between her legs.” pg 131

Laughing, she leaned her head against his and looked down. “We've got company, mon capitain.”

“What—?” He moaned as her hand slid down to his privates.

“I want to play a different game,” she murmured, gently pushing him down on the rug.” pg 132

AND I CHARGE THAT HERETOFORE, AND BEFORE THE MAKING AND FILING OF THIS COMPLAINT ON OR ABOUT THE 2ND DAY OF MAY 2022, IN THE COUNTY OF HOOD AND STATE OF TEXAS, [REDACTED] DEFENDANT, THEN AND THERE INTENTIONALLY AND KNOWINGLY POSSESSED FOR SALE, DISTRIBUTION, OR EXHIBITION TO #1 THE [REDACTED] SCHOOL STUDENT BODY, A COLLECTION OF APPROXIMATELY 900 INDIVIDUALS WHO WAS THEN AND THERE YOUNGER THAN 18 YEARS OF AGE, HARMFUL MATERIAL, NAMELY #2 SPECIFICALLY, #2.1 A COURT OF THORNS AND ROSES BY SARAH MAAS; #2.2 A COURT OF MIST AND FURY BY SARAH MAAS; #2.2 A COURT OF WINGS AND RUIN BY SARAH MAAS; AND #2.4 GONE. A TEACHER. A STUDENT. CROSSING THE LINE. BY KATHLEEN JEFFIE JOHNSON, AND THE DEFENDANT POSSESSED THE MATERIAL KNOWING THAT IT WAS HARMFUL AND KNOWING THAT THE STUDENTS WERE INDIVIDUALS, THE VAST MAGORITY OF WHICH WERE YOUNGER THAN 18 YEARS OF AGE. #3 AND DID HIRE, EMPLOY, OR USE A MINOR(S) TO DO OR ACCOMPLISH OR ASSIST IN DOING OR ACCOMPLISHING THE AFORE MENTIONED ACT(S).

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Complainant

SWORN TO AND SUBSCRIBED BEFORE ME BY Scott M. London, a credible person, this
_____ day of _____ 2022.

JUSTICE OF THE PEACE, HOOD COUNTY
Precinct 4

Prosecution [] approved [] declined

DISTRICT ATTORNEY'S OFFICE
355TH DISTRICT OF TEXAS

DATE