

COUNTY COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU

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THE PEOPLE OF THE STATE OF NEW YORK,

-- against --

JESSE FRIEDMAN,

Defendant,

AFFIDAVIT OF  
BRIAN TILPER

Indictment Nos.  
67104, 67430, 69783

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Brian Tilper hereby swears, under penalties of perjury, that the following is true and correct:

1. I am 24 years old. I currently live in Astoria, New York and am attending law school at St. John's University School of Law.

2. My family resides in Great Neck, New York. When I was about 8 years old, I attended the computer classes taught by Arnold and Jesse Friedman.

3. During the investigation of Jesse and Mr. Friedman, the Nassau County Police visited our house, unannounced, and questioned me regarding the computer classes and particular any inappropriate behavior of Arnold and Jesse Friedman.

4. I remember the police questioning me on two occasions. On each occasion,-- I told them I had never been abused by Arnold or Jesse Friedman or anyone else, and that I did not witness anything inappropriate in the computer classes at any time. I recall that this did not end their questioning and that I felt that they would be unsatisfied with any response other than my concurring with their view that sex abuse had taken place in the Friedman computer classes.

5. I remember that they made specific suggestions to me about things that they believed happened in the computer classes, and that they told me repeatedly that other students in my class had already told them that they had been abused, and that they were certain that in fact I had also been abused and that I should tell them so.

6. I remember an African-American detective was alone with me in the kitchen and he asked me specific questions about molestation, including recounting for me certain statements that others had allegedly made.

7. During these interviews I recall that various police officers who had interviewed me, including the African-American detective, had a notepad and took notes of my statement while I was telling them that I was not abused and had not seen anyone else being abused.

8. After many sessions in which the police appeared unsatisfied by my negative responses, I became frustrated at the persistent questioning. As I stated in my interview with Mr. Jarecki for his film, I remember finally telling the police officers that I had seen Jesse chase after a kid and hit him. I remember saying that not because it was true, but instead because I thought it would get them off my back. This statement was not accurate but at the time – being 8 years old – I felt that saying this would allow me to avoid the unpleasant experience of being questioned repeatedly by the police.

9. After I made this statement to the police, which they also took notes of, they asked my parents if they would allow me to testify before a Grand Jury to having been witness to such an incident, and so I did.

10. A number of other families with whom my family had been friendly also had children who were involved in the case. I remember hearing from my parents at the

time that one set of parents of one of my friends had been very aggressive with my parents and encouraged them to believe that I had been molested by the Friedmans. My parents spoke to me about this and when I told them it had not occurred, they told the other parents. I heard from my parents that the other parents became angry and told my parents that my friend (their son) had already told them that he had seen me being abused in the Friedman class and that my parents were “in denial” about my having been abused. This was not true.

11. My friend (their son) had also been interviewed by the police and called my house to tell me about it immediately after they had left his house. He expressed great excitement about it, and considered it something of an adventure. It was confused because I had never seen him or anyone else being abused in the computer classes. Later, when I learned that he had become a major complainant in the case, I was not surprised, not because I had ever seen him engaged in anything inappropriate, but because he had been so enthusiastic about participating and helping the police. Some kids appeared to get a lot of excitement out of the attention they were getting from the police. On a number of occasions, I heard from friends that the police had brought pizza over to their houses, and in one case, that the detectives had “deputized” the boy, giving him a play badge to wear.

12. My own recollection of the computer classes was a perfectly pleasant and uneventful one. The classes lasted about 90 minutes and we would be given rudimentary computer programs to create. We also played computer games sometimes, but I was never offered, never saw, and never played with a computer game of a sexual nature such as those alleged to have been present in the computer classes.

13. I can state without reservation that nothing untoward ever happened to me and that I never witnesses anything untoward happening to anyone else in the classes that I attended.

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Brian Tilper

Sworn before me this 23rd  
day of December 2003