

EXHIBIT 2

Thad Shaffer Affidavit

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

BLAISE CHIVERS-KING, *et al.*,

Plaintiffs,

v.

WYOMING DEPARTMENT OF FAMILY
SERVICES, WYOMING BOYS' SCHOOL, *et
al.*,

Defendants.

Case No. 24-CV-00039-SWS

AFFIDAVIT OF THAD SHAFFER

I, Thad Shaffer, being first duly sworn, depose and state as follows:

1. I have personal knowledge of all matters set forth herein.
2. I have never instructed any WBS staff member to falsify incident reports or otherwise create inaccurate records. I have never threatened the job of a WBS employee who refused to do so.
3. I did not physically manage, restrain, tackle, or “bear hug” former WBS student Koby Cranford by taking him from a standing position to the ground. I did not witness or observe any WBS staff member physically manage, restrain, tackle, or “bear hug” Mr. Cranford by taking him from a standing position to the ground.
4. Over the period that I have worked in the Risk Management Office at WBS, the Boys’ School has not possessed any type of gun, including a 12-gauge shotgun, or any other device capable of discharging a bean bag round. Over the entire time that I have worked at WBS, I have not been aware that the Boys’ School had a “bean bag gun” or any device from which a bean bag round could be discharged.

5. Karn had a history of rushing the door while staff attempted to exit the detention room, either to attempt an escape or assault staff. Based on this history, Karn's standing up on June 23, 2021 while staff attempted to exit the detention room created a safety risk.

6. I have reviewed the video of Karn's restraint on June 23, 2021, and Mark Nelson is not present in the room at any time during the restraint.

7. Based on my experience with Karn, he would feign attacks by making a flinching motion. Karn made this type of flinching motion on June 23, 2021, but it is not visible in the video of the restraint due to the camera angles and the position of staff around Karn.

8. Since my deposition I have had further opportunity to review the video of Karn's June 7, 2021 restraint. During my deposition I had difficulty hearing the audio, and consequently testified incorrectly to the following:

a. On Page 245, lines 21-22, and Page 246, lines 6-7, I testified "Yes" and "It sounded like me" when asked if I heard someone say "You sure love that chair?" Upon further review, I did not make this statement.

b. On Page 251, lines 4-6, I testified that the speaker "sounded like me" when asked if I made the statement "That's what makes it worth it". Upon further review, I did not make this statement.

9. I have never grabbed Haiden Willis by the back of the head and slammed his head into a wall causing his nose to bleed as stated in Paragraph 112 of Plaintiffs' Response to Defendants' Summary Judgment Motion.

DATED this 26 day of June, 2026.

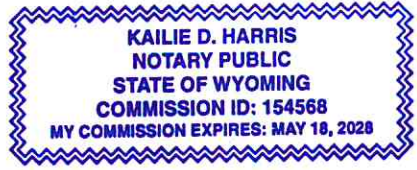
Thad Shaffer
Thad Shaffer (Jun 26, 2026 12:03:58 MDT)

Thad Shaffer

STATE OF WYOMING)
) ss.
COUNTY OF LARAMIE)

SUBSCRIBED AND SWORN TO before me by Thad Shaffer this 26th day of June, 2026. This notarization was completed remotely using Adobe Acrobat and Google Meet.

Witness my hand and official seal



Kailie D. Harris

Notary Public

My commission expires: May 18, 2028