

### **DECLARATION OF DELICIA COLE**

1. I, Delicia Cole, state that I am over the age of eighteen and competent to make this sworn declaration.

2. I am a resident of Woodbridge, Virginia.

3. Brian Cole, Jr. ("Brian") is my son, whom I raised through adulthood.

4. Brian lives with me in my home in Woodbridge, Virginia.

5. In or before 2018, while living in my home, Brian attempted a science experiment to create homemade "rocket fuel."

6. This science experiment involved the use of potassium chlorate, which I have learned is commonly used in these science experiments.

7. My understanding is that to attempt to make the chemical potassium chlorate, Brian used bleach. I observed numerous articles and YouTube videos, accessible through a Google search, with instructions on the use of bleach to make potassium chlorate.<sup>1</sup>

8. While using bleach for his science experiment, Brian spilled bleach on the carpet in our home.

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<sup>1</sup> See, e.g., <https://www.instructables.com/Make-Potassium-Chlorate-from-Bleach/>, <https://www.youtube.com/watch?v=4Kq9r5vFoQU>, [https://www.youtube.com/watch?v=7MsHq\\_dUfnY](https://www.youtube.com/watch?v=7MsHq_dUfnY).

9. I observed numerous articles and YouTube videos, accessible through a Google search, with instructions on the use of potassium chlorate to make homemade “rocket fuel.”<sup>2</sup>

10. Brian’s attempt to create “rocket fuel” was an innocuous science experiment without any ill intent.

11. During the time of Brian’s science experiment, his sister (and my daughter), Bridgette, and his brother (and my son), Brandon, also lived in the home and were aware of his “rocket fuel” experiment. Brian’s father (and my ex-husband), Brian Cole Sr., also lived in the home and was aware of Brian’s experiment.

12. Brandon moved out of my home by approximately 2018. Brian Cole Sr. and I separated, and he moved out by approximately 2020. Bridgette moved out shortly thereafter.

13. Because I know Brandon, Bridgette, and Brian Sr. were living in the home at the time it happened, I know that this experiment occurred years before January 5, 2021.

I, Delicia Cole, declare under penalty of perjury that the foregoing is true and correct.

Executed on January 27, 2026.

DocuSigned by:  
  
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Delicia Cole

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<sup>2</sup> See, e.g., [https://melscience.com/US-en/articles/rocket-experiment/?srsltid=AfmBOooSHx4F0tvdQUqH1OJkMKP5\\_Yu5QIG4S8zXMDuSn9vvPAREvS5w](https://melscience.com/US-en/articles/rocket-experiment/?srsltid=AfmBOooSHx4F0tvdQUqH1OJkMKP5_Yu5QIG4S8zXMDuSn9vvPAREvS5w), <https://pubs.acs.org/doi/10.1021/ed500522c>, <https://www.youtube.com/watch?v=yQdOwgk22ng>.