

BEFORE THE GOVERNOR OF THE STATE OF MISSOURI
THE HONORABLE JAY NIXON

In the Matter of:)
)
PAUL GOODWIN,) Scheduled for Execution by the State
) of Missouri on December 10, 2014, at
Petitioner.) 12:01 a.m.
)

AFFIDAVIT OF CHARLES ARMENTROUT

1. My name is Charles Armentrout. I am an inmate at Potosi Correctional Center in Mineral Point, Missouri. My inmate number is 990142. I have been an inmate at Potosi Correctional Center since 1996. I was formerly condemned to die by the state of Missouri, but in 2006 the state agreed to commute my sentence in exchange for a sentence of Natural Life if I agreed to drop my appeals, which I did.

2. I was already at Potosi Correctional Center when Paul Goodwin arrived. I saw Paul arrive at Potosi Correctional Center around four o'clock (4:00) one afternoon. I was not quite sure what to make of all the corrections officers they had escorting Paul -- there were something like ten (10) of them. I assumed Paul was under a death sentence because of how many corrections officers there were, and, I later learned that was a correct assumption. However, once Paul got off the bus, and I could see him better, I wondered if all those corrections officers were needed (I think they were there mostly because of Paul's size). I still remember that my first impressions of Paul were

based on his posture -- he looked like Baby Huey, in that he was slumped and hulking. Even from a distance, I could tell that he was not very bright.

3. Paul and I both attended Catholic Services early in Paul's time at Potosi Correctional Center, so I got to know him a bit through church. It was about a year or so before I had a chance to really get to know Paul. All inmates start in what is called 3 House. All inmates then have an opportunity to move into what we call the "Honor Dorm" if their behavior is consistently good. I would guess that it took Paul about a year to move through the housing units to get to the "Honor Dorm," which is where I got to know him better.

4. Paul is a "big dummy." I do not want that to sound mean or derogatory, but it is the perfect description for him. He is very large, physically, and he is really not very bright. He has a child-like need for attention. There is a definite disconnect between what Paul thinks he sees and hears and his understanding of reality. Just from the way Paul talks, you can tell that his expectations of outcomes in most situations are not reality-based, and that in general, he does not have much in the way of common sense.

5. Paul does not know how to manage his money. He has no sense of the value of his money, or of the limits placed on commissary spending. In some ways, Paul has been fortunate, because his family sends him money every month. While I do not know for certain what Paul's family is sending him each month now, I would guess that it is in

the neighborhood of \$300.00, or maybe more -- whatever is the maximum an inmate is allowed to spend. I do not know what the current weekly spending cap is, but I think it is something like \$80.00 or \$85.00. It does not apply to me, as I never have that much money to spend. What I do know is that Paul would spend to the cap each and every week.

6. If you have the maximum allowable spending money, like Paul does, and can spend until you are cut off (for having reached the monthly maximum), you do not really have to be able to manage your money -- and Paul does not and cannot manage his. I know this to be true because there are occasionally items that can be purchased outside of commissary that do not count against the maximum that you are allowed to spend each month. When Paul had an opportunity like that, he would spend more money than he had for the month and inevitably end up upset because he did not have enough money at the end of the month. As often as I tried to caution Paul in those months where I thought he was going to run out of money at the end of the month, my words of caution never really sank in, and at the end of some months, Paul would be really upset, because he could not participate in commissary.

7. Paul ate, smoked and drank everything he purchased through commissary almost as soon as he got it. Paul, who is diabetic, ate more sweets than I *ever* did, and I am not diabetic. I used to tell Paul I could hear his pancreas screaming. At one point, maybe because I had been on Paul to be more careful about what he was eating, Paul

stopped drinking soda, but he would still eat something like twenty (20) Honeybuns in a sitting. I do not think it was that Paul did not care about his health; it was more that he was not able to think through the consequences of his eating habits.

8. I think that sometimes, because Paul did not really understand the rules, he just sort of figured that they did not apply to him. It was not so much that Paul did not want to "bother" with the rules, or that Paul thought he was "better" than others as it was that the rules did not really make sense to him, so he did not worry about them. He is very concrete and specific, and is unable to see the bigger picture and therefore his decision-making is skewed. While I cannot speak about every single one of Paul's Conduct Violations, I would venture to guess that probably at least half of them are because he is so literal.

9. While Paul is not very bright, I feel that he has become pretty adept at not being taken advantage of. He was always willing to help anyone who needed help. If he came to feel that a person had taken advantage of him over time, he would probably not give anything to that person again. I do know that he really tried to help and support his friends. If I never needed anything, for example, and I asked Paul for it, he would get it if he could. I think Paul trusts me -- and the other men he tries to help, too.

10. There was a time a number of years ago when a group of inmates took advantage of Paul and his family. My understanding is that Paul's uncle's company

wanted to do something nice for some of the inmates at Potosi Correctional Center. They sent eight (8) or twelve (12) inmates money so that they could buy themselves televisions. Because it is against institutional policy for one inmate's family to send money to another, Paul received a Conduct Violation for this and was sent to solitary confinement. I do not believe anyone "extorted" Paul in this situation, but, I do believe his lack of good judgment and poor understanding of consequences played a role in the way this situation unfolded. In Paul's mind, he was doing something nice for these inmates, not breaking a rule. In the end, Paul was only disciplined for the television money incident for about a month, which makes me think that those who are responsible for reviewing Conduct Violations saw it for what it was -- NOT a blatant disregard of rules, more an example of Paul's limitations. I believe the staff at Potosi Correctional Center understands Paul's limitations.

11. About three and one-half (3 1/2) years ago, Paul and I became cellmates. Once Paul and I became cellmates, we agreed to try to get a dog through the Puppies for Parole program.

Paul and I were involved in the Puppies for Parole program while we were cellmates. The Puppies for Parole program provides inmates with dogs awaiting adoption, training, and a strict set of guidelines and formal protocol that the inmates are expected to follow. The hope is that dogs that graduate from the program will become more adoptable. The program requires that both cellmates apply for and be accepted into the program before

they are provided with a dog. I knew when I agreed to apply to volunteer in the program that I would be the one doing the paperwork, completing the training logs, and documenting what we were doing with the dog. I did not think Paul fully understood what was going to be expected of him, and I understood that there would be requirements of the program that he would not be able to fulfill.

12. Paul and I applied to be in the Puppies for Parole program, were accepted, and received our first dog -- Dakota. Dakota was a Bernese Mountain Dog. Dakota was very aggressive, and had significant issues around food. Dakota growled and nipped at us under the best of circumstances. Even knowing that Dakota had issues with aggression -- especially around food -- Paul would still try to play with Dakota when he was trying to eat. Paul got down next to Dakota while he was eating and even while Dakota was growling and nipping at him, Paul was still confident that Dakota was not going to bite him. In my mind, this is an example of Paul's very poor judgment. In the end, I was the one that Dakota bit, and Dakota was removed from the program. Paul cried like a baby when Dakota was removed from our care.

13. Our next dog was named Bella. She was a Shih Tzu mix. Bella was old and sickly. I think Bella would have died had she not been given to us, as she had so much wrong with her. She was in a "really bad way" when she came to us. Unfortunately, Paul had a lot of trouble with open wounds on his feet while Bella was with us, and he

was not able to really care for her. Eventually, Bella completed the program and was adopted, although Paul had not played a significant role in her care and training.

14. Sharing the responsibilities of training the dogs we were assigned through the Puppies for Parole program was hard. Paul really did not have the capacity to put the dogs through a rigorous training program, and he did not understand why it was so important for us to follow certain protocols. It really seemed like all Paul wanted to do was to play with the dog. Paul would get down on the floor and wrestle with the dog. If I tried to tell him that he should interact with the dog differently, Paul would always say, "It's just a dog. A dog's gotta play." To me, that was evidence that Paul did not understand how the program really worked.

15. I do not know whether or not Paul was ever formally removed from the Puppies for Parole program, but I do know that there came a time when they just stopped giving him dogs. I think that it was mostly because of his medical, but I do not know for certain. My guess is that the medical staff at Potosi Correctional Center said Paul should not have a dog because of the amount of walking involved. After they stopped assigning dogs to Paul, he took a few dogs out as a "dog sitter," but I do not think he handled the responsibility of even than relatively simple job very well.

16. I am not a "clean freak." In here, if a cookie falls on the floor, some guys are ready to be done with it, and to throw it away. In my mind, if I drop a cookie, I hope it

does not break into too many pieces and I pick it up, brush it off and eat it. I was okay with Paul's approach to cleaning our cell, although I know that some of the other inmates Paul celled with did not find him to be thorough enough. I also know that some guys have said that Paul used toilet water to clean the cell. I never saw him do that, but it would not have bothered me, as long as he flushed first. I have wondered if maybe we cleaned more while we were living together because we had a dog and we had to be sure we kept things very clean since we had a dog in our space.

17. Paul receives a number of magazines -- like *Vanity Fair*, *Expo*, *Shape*, *Discovery*, *Biker*, *Easyriders*, and *Popular Science*. I also think he receives a number of magazines about cars, but I cannot recall any specific titles. Paul also receives newspapers, including the *St. Louis Post Dispatch*. I am not actually sure if he reads them all or if he just looks at the pictures. I do know that Paul never talked with me about anything he read, so it is possible that he was not actually reading. He has always been very generous with his magazines and newspapers, passing them on when he is done with them.

18. Paul likes to play Scrabble. Playing Scrabble with Paul can be frustrating for a lot of us, because he does not know how to spell very well and he often misspells words or makes words up as he goes. He will also cheat by pulling too many tiles out or by peeking at them before he takes them. I think many of us who play with Paul have come to understand that winning at Scrabble is far more important to Paul than it is to

any of the rest of us, so we just let most of it go. Whenever Paul won a game of Scrabble, he would jump up and down and get all excited -- like a kid would do...which is perfectly in keeping with how he behaves most of the time.

19. Paul can be hard-headed, and takes offense if someone tries to correct him. He does not ever want to look like he is wrong. It can be hard to deal with Paul because of his limitations. He thinks he sees and understands things about a situation that are not really accurate because he does not understand the subtleties.

20. Paul is super literal, like the genie in the Geico commercial who produces a million male deer in response to the man's wish for "a million bucks." While I cannot think of a good example of Paul being very literal, I know that whenever I was dealing with him, I often found myself having to say to Paul, "Paul -- that's not what I said." (As in, that's not what I *meant*). Unfortunately, I feel like most of the time Paul does not really understand fully what is happening around him.

Further affiant sayeth not.



Charles Armentrout

SWORN to and SUBSCRIBED in my presence
this 29th day of November, 2014.



Notary Public

