

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 LOGAN MIFFLIN

1. My name is Logan Mifflin. I am Paul Goodwin's maternal nephew. My mother, Mary Mifflin, is Paul's oldest sister. I am nineteen (19) years old.
2. I am finishing my senior year of high school while also attending Missouri Baptist University. I am dual-enrolled, and will graduate from high school in the spring of 2015. I am planning to take the ACT test in the spring and hope to get a thirty-four (34) or something like that. I have not decided where I am going to go to college, but I might transfer over to University of Missouri -- St. Louis (UMSL).
3. I also work five (5) days a week at United Parcel Services (UPS), as a supervisor. I work the overnight shift, and start between 9:00 pm and 10:00 pm and usually get off around 4:00 am or 5:00 am. It is not exactly a good job, but it is necessary because UPS will pay fifteen thousand dollars (\$15,000) of my college tuition as long as I continue working for them. If things go as I have planned -- if I get the kind

of ACT test score I think I can and I keep working at UPS -- I will be able to pay for my own college. That is important to me, as I do not want my parents to have to pay for my college education.

4. I think it is hard for people to understand what my Uncle Paul is like -- what his deficits are -- unless they have met him, but, I will do my best to explain in a way that might help people understand. I call my uncle "Paul," not "Uncle Paul." I think I call him by his first name only because, due to the nature of his deficits, he does not really seem like an uncle -- maybe more like a peer, or even, now, someone younger than me.

5. My earliest memories of my uncle are from when he was in the county jail, but most of my memories of my uncle are from my visits with him while he has been in prison, at Potosi Correctional Center. When I visit with Paul, we talk about very mundane topics such as prison life, games and television shows.

6. Because there is a limit to what we can talk about during the course of a visit, we often play games. We usually play Scrabble, Chess, Poker or Go Fish. I know it might be hard to believe that Paul can play chess, but he does -- to some degree.

7. Paul has a very child-like tendency that is always present. A good example is from when we play games during our visits. If Paul is losing the game, he either changes the rules or he outright cheats to give himself the advantage. A specific

example of this behavior comes from our chess games. In chess, the queen has the combined ability of all of the pieces to move around the board. If my uncle is losing, he will assign this powerful ability to some other piece, like a pawn (a piece which is extremely limited in terms of movement), so that he can take one of my pieces. While I view this as a naturally defensive reaction to falling behind, my uncle's behavior also reminds me of my aunt's son, Chase, who is nine (9), and autistic. While this kind of behavior is understandable from Chase, a child with a disability, it illustrates my adult uncle's limitations.

8. My uncle has a LOT of experience playing Scrabble. As a result, he has a good grasp on the rules and how the game of Scrabble is played. Over the years, my uncle has even become familiar with some of the words that are commonly used in Scrabble. The issue in playing Scrabble with my uncle usually comes up when he invents words (by this, he either completely makes up a word or misspells a word and insists that it is spelled correctly). Sometimes when my mother and sister are visiting, they will get into brief arguments with Paul over this behavior, and they will usually check the dictionary. Even then, once they have checked the dictionary and determined that my uncle's word is not in the dictionary, he will insist that the dictionary is wrong. At that point, my mother and sister usually just move on, and allow Paul's word to stand.

9. My uncle is *not bad* at Scrabble -- he's not horribly bad, at least. But, in addition to making up words, my uncle also cheats at Scrabble in other ways. When it is my

uncle's turn to draw new letters, he will peek to see which letters he is getting so that he can draw letters that he thinks will work with what he has in his hand, instead of drawing random new letters like he is supposed to be doing.

10. It really does not matter what the game is, or how well Paul does or does not understand it -- if he is losing, he will use any means to make the game go back into his favor -- he will cheat, or invent rules -- it does not matter what it takes. At first, when I was younger, I would get angry and go on the defensive when my uncle did that. Over time, I realized that those kinds of behaviors happened every visit. At some point -- maybe sometime in the last few years, I decided to just let it go. Honestly, I do not really care if my uncle wins -- winning is not that big of a deal to me and it is obviously a MUCH bigger deal to Paul than it is to me.

11. My uncle's limitations are evident in all aspects of our visits with him. You can also see his limitations in the things he talks about. While it might not initially be obvious, Paul is very self-centered and can really only be in the present moment. He talks about his health, his feet (because he is diabetic, and suffers from neurovascular disease, his feet are often a concern), his toothbrush and his hearing aids. If you are visiting Paul, you will get treated to a list of everything that is not right with him. After a short while, the conversation becomes very monotonous for the listener. Every visit, it is the same thing -- my uncle's stories are the same -- and he just keeps talking about the same things about himself, over and over again.

12. While our relationship is mostly based on my visits with Paul, I usually write him a letter a couple of times a year, and when he calls I talk to him on the phone. Those contacts are basically the extent of our relationship, and it is because of my uncle's limitations that our relationship is not more developed. That said, I value my relationship with my uncle, and I think we have a good relationship. Paul has taught me a lot over the years, because of the way he is. While my mother says Paul freezes people in time, I feel more like it is that my uncle is frozen in time.

13. At times, my uncle can be humorous. He tells jokes and shares funny anecdotes of life in prison. He sometimes talks superficially about his interactions with other inmates and his relationships with the guards. He is never able to develop these accounts and cannot really answer questions about them most of the time.

14. My mother, Mary Mifflin, recently observed that my sister, Morgan, and I really passed our uncle up (developmentally and socially speaking) years ago. While we have grown and changed, it is like Paul is frozen in time. At some point -- maybe when we were fourteen (14), fifteen (15), or sixteen (16) years old -- we got so that we did not always want to go and visit our uncle. It was not that we stopped caring about him; it was more that the visits were boring. Paul was still telling the same kinds of jokes with us that he had been telling since we were little kids. For example, when my sister Morgan was about six (6), she and my uncle had a joke about her having "poop" in her

hair. He just (last week) sent her a birthday card for her seventeenth (17th) birthday and he is still making that same joke. While we have grown, matured and moved on, Paul has not.

15. I feel badly for my uncle, because he is aware that my sister and I have passed him up. He is limited enough that he falls into the range of someone with an intellectual disability, but he is just smart enough to know that he does not really fully comprehend all that is going on around him. I think that my uncle's awareness of his limitations is part of why he will try to cheat so that he can win when we are playing games during our visits -- it is almost like he is trying to fool us into thinking he is smarter than he is, even though he knows we know how limited he is.

16. My uncle has a very special connection with his mother. From what I have heard, it sounds like his relationship with his father was rocky (to say the least) when he was growing up. Because of his limitations, my uncle relied heavily on his mother for support in all aspects of his life prior to his arrest -- and in many ways, Paul has continued to rely on her even since his arrest. It is my sense that my grandmother has been my uncle's "number one" person in his life since the very beginning. I think it is possible that Paul's late girlfriend, Penny, might have replaced his mother (for a little bit, as his caregiver), while they were dating. However, after Penny died, Paul went back to depending on his mother. I know it might seem like Paul would need much now that he is incarcerated, but he relies on his mother for emotional and financial support even

17. I have determined that the death penalty should not be allowed in this country, for a broad scale of reasons. When it comes to my uncle, I do not want him to be executed because I have visited him in prison for the last fifteen (15) years. I feel a connection and closeness to him that I do not want to lose. But, more than anything, when I think about the fact that my uncle is facing execution, I feel sorry for my grandmother (Paul's mother) and to some extent for my mother. If my uncle is executed, I will be devastated, but, my grandmother would be hurt the most; it would be terribly tragic for her.

Further affiant sayeth not.

Logan Mifflin 12/1/14
Logan Mifflin

SWORN to and SUBSCRIBED in my presence
this 1st day of December, 2014.

Scott A. Campbell 12/1/14
Notary Public

