

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 RONALD WRIGHT**

1. My name is Ronald Wright. I go by Ron. I am an inmate at Potosi Correctional Center in Mineral Point, Missouri. My inmate number is 341.
2. Paul Goodwin and I were cellmates ("cellies") for quite a while. We celled together from early 2012 through the summer of 2013. We have not been cellies for more than a year, but I still know how he is doing. I suspect that anyone who has talked to other inmates here at Potosi Correctional Center would be able to tell you that Paul and I did not always get along while we were cellies. While it is true that we have not always gotten along well, I think it is important to say that the reasons we did not get along were mostly due to Paul's limited functioning.
3. I also want to say that Paul and I became cellmates after a long period of him wanting me to cell with him. I never really understood why he wanted me to cell with

him, but eventually I agreed to because Paul wanted me to be in the Puppies for Parole program with him and I was interested in having a dog to train.

4. Shortly after Paul and I began celling together, we had our first disagreement. Cellies usually agree on a division of labor that works for them. We had agreed that Paul would clean the cell. When it came time for Paul to clean the cell, he got some detergent and put the soap in the toilet. He swished a rag around in the toilet bowl water to make some suds and then started washing down the cell with a rag he was dipping in and out of the toilet. Even though I knew he had some limitations, I just could not accept that Paul was cleaning my living space with water from the toilet bowl. I stood up to Paul, telling him that we were not going to clean the cell like that. Paul responded negatively, because he did not want me telling him what to do. We had some words and then we stopped talking.

5. Paul and I did not talk for a few days after the disagreement we had about cleaning. After a few days, Paul came up to me in the yard to apologize. He told me that he knew it was stupid to clean that way, and that he would do it how I wanted him to from then on. I learned Paul had told his mother about our disagreement and that she had agreed with me that that was a nasty way to clean the cell.

6. Any time we had a disagreement of any kind, Paul would not talk to me for a few days. Then, eventually, he would drift toward me while we were out on the yard for

recreation. He would always apologize, saying that he knew I was right -- and I could tell that acknowledgement made him feel bad.

7. Another big disagreement we had is sort of embarrassing to me, but I will share it because I think it says a lot about how Paul functions. I was sleeping on the top bunk, and Paul was hanging out in the cell. Apparently I was facing away from Paul, so my behind was pointed in his direction. I passed some gas and he thought it was the funniest thing in the world. He reacted by mimicking the sound I made by making a loud farting noise repeatedly. I was really angry that he woke me up -- and a bit embarrassed, too -- that he was making such fun of me. His reaction to my passing gas was not very mature, especially when you stop to think that he was a forty-plus (40+) year old man at the time. Once I realized that his overall immaturity was reflected in his reaction, I was not as angry.

8. Another time Paul and I had a disagreement was over him bumping up against the supports for the top bunk while I was trying to sleep. As many times as I tried to explain to Paul that he woke me up every time he bumped up against the top bunk, he just kept doing it. Initially I was very angry with Paul, but over time I came to realize that it was just another example of the ways in which Paul is really childish.

9. The last time we had a disagreement resulted in Paul being written up and removed from our cell. Because of the circumstances, I was not completely aware of

the facts at the time of the incident, but, it is my understanding that Paul wrote something to the caseworker which resulted in the caseworker talking with each of us separately. When the caseworker talked to me, he said, "I hear you are not getting along with your cellie." I replied that we had had a few disagreements, but no physical altercations. The caseworker told me he was planning to separate us, but wanted to know if we could stay together one more night, so that he could make the move the following day. I agreed, feeling that there was no danger to me. Apparently the caseworker asked Paul the same kinds of questions. I do not know what Paul said, but I do know that he was written up and sent to the hole (read: solitary confinement).

10. When Paul was about to be released from the hole (read: solitary confinement), the Missouri Department of Corrections asked me to sign an enemy waiver, saying that I did not have a problem being around Paul. The first time I saw Paul after he was released from the hole (read: solitary confinement), I really did not want anything to do with him. However, Paul greeted me saying "Ronald-san," which is what he always called me (because there was an older Chinese man here who had always called me that), and it was like there had never been a problem.

11. Paul does not always understand how his actions are going to be perceived by others. When I try to think of an example of this, a good example is of what our relationship was like after Paul got out of the hole (read: solitary confinement). Shortly after he got out of the hole (read: solitary confinement), I saw Paul up in the medical

unit. I am a hospice volunteer and I was there sitting with my hospice patient. Paul acted like there had never been any sort of an issue between us. I was sort of holding myself apart from him, and he was a bit mad at me for that. Looking at the situation now, I think Paul probably did not understand that I would not like it that he had said something so bad about his intentions toward me that he was written up, removed from our cell, and sent to segregation. He is immature, and socially incompetent. Paul lacks an understanding of cause and effect, and this is a good example of that.

12. Paul has never been able to manage his money, but he really does not have to manage his money very well. I say Paul does not have to manage his money because of his family's financial situation. At Potosi Correctional Center, all inmates have a commissary account. Inmates are allowed to spend a maximum of \$350 per month. Once a week, on a specific day, every inmate has a "Spend Day," which is his chance to spend up to \$87.50 in the commissary. Paul always spends the maximum, every week. There are also special fund-raisers in which inmates can purchase special things like pizzas. Paul always buys the limit. The only time this form of money management is a problem for him is during those months that have five (5) "Spend Days," which happens a few or more times every year. *Every single time* we had a month with five (5) "Spend Days," Paul would come up short for the last week, because even if he had money left in his commissary account, he had spent the maximum amount allowable. Even though this situation happened with some frequency, Paul never learned to plan differently -- even when I reminded him and tried to get him to plan accordingly.

I think there are people (other inmates) who take advantage of Paul. A recent example of that comes from an inmate who sold him a used CD for \$15.00. The going rate is \$5.00 for a used CD. Apparently Paul did not know that at the time, and sort of got into it with the other inmate (verbally) when he learned that he had paid more than he should have.

13. While there are some inmates who take advantage of Paul, he is also a very generous man. He helped me celebrate my birthday on both of the birthdays I celebrated while we were cellies. He gave me a compact disc (CD), a whole pizza, a hamburger and ice cream. I believe one year my birthday coincided with a fundraiser that the facility was doing, and, of course, Paul bought the limit.

14. Paul is a little bit of a loner, but he has a couple of people that he hangs out with. A while back, Paul was very interested in getting to know a man named Carmen Deck better. I could tell Paul wanted to get to know him better because Paul always hung around him. Carmen brushed Paul off, as though he was not really interested in getting to know him. I do not know how things unfolded, but I do know that Paul and Carmen eventually became good friends.

15. For as big as Paul is, he acts like a sissy. I think he is afraid of many things, and is unable to express his fears. I am not certain he fully understands what it means to be executed.

Further affiant sayeth not.

  
\_\_\_\_\_  
Ronald Wright



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

