

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.  
 )

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**AFFIDAVIT OF THEA PALERMO**

1. My name is Thea Palermo, and I am the daughter of the late Penny Palermo. My mother and Paul Goodwin dated for about five (5) years when I was a child and teenager. He lived with us starting when I was twelve (12) years old. I moved out, to live with my father, when I was sixteen (16) years old. I moved back in a few months before my mother passed away. For the entire time my mother and Paul Goodwin dated, they lived together with the exception of a three (3) month period of time when they were separated and not living together.
2. I had some interesting experiences while I was growing up, and was not sheltered in the ways many children are. I grew up in a bar, where my mother worked as a bartender, and watched deals happening all around me.
3. I have a Master of Arts in Applied Educational Psychology from Webster University. I am working on a second masters in Psychology with an emphasis on Applied Behavioral Analysis. When I complete my studies, I will have a Masters of

Science in Psychology. I work with people who have developmental disabilities and/or who have intellectual developmental disorders. My clients range from very low-functioning autistic individuals with severe behavior disorders, such as aggression and self-injurious behaviors to high-functioning individuals with autism to people living with cerebral palsy.

4. Because of my early childhood experience, my experiences living with Paul Goodwin as a child and teenager and my education and training, I am uniquely qualified to talk about Paul Goodwin's deficits and limitations.

5. My mother worked in a factory before she met Paul. She had a back injury at work, and blew out her back. She lived in pain after her accident at work, and her difficulties were compounded by her father's death, which happened around the same time as her injury at work. I believe that as a result of her injury and her loss, my mother became depressed, and every one of her poor behavior functions were the result of her depression.

6. After my mother's accident, she began abusing drugs. I think it was a combination of pain and depression that drove her to do that, and it started before she met Paul. As far as I know, my mother was only using prescription drugs and alcohol until I was about sixteen (16) years old. I believe she began using other drugs at some point around that time.

7. Once Paul and my mother started seeing each other, he had very little to do with his family. I had the impression that Paul's family did not approve of his relationship with my mother, and I think it was easier for him to just stay away from his family than to try to deal with their disapproval. My family all loved Paul, so, he sort of adopted them as his family.

8. Even though she was profoundly depressed, my mother was in charge in her relationship with Paul. In fact, my mother ran the whole house, although given her physical disability and her back pain, there were lots of times when she simply was not able to run things like she wanted. Paul did anything my mother asked him to, because he loved her. Sometimes he would walk to a nearby store to get alcohol for her. Other times, he would buy her Darvocet or Percocet. I could tell, even back then, that when my mother wanted drugs or alcohol, she was able to manipulate Paul into getting whatever it was that she wanted.

9. Whenever my mother was not well enough to run the house, I ran the household in her place, although she was the one who paid the bills. Even though I was only twelve (12) or thirteen (13) years old, I was the one who kept track of what we needed. I remember that I would tell Paul to take me to the store to pick up something for dinner or toilet paper, or whatever. When that happened, I would have my mother's food stamps with me, and I was the one who managed them.

10. Looking back, I do know that Paul drove, although never very far. I do not know whether or not he had a Driver's License, although I do remember that once, when he drove my mother to the hospital, he was arrested because of an outstanding warrant (I do not remember what it was for). Certainly if Paul did not have a Driver's License, his driving without one shows a clear impairment in judgment. I do not remember much about Paul's driving other than it always seemed like he drove really fast. I also remember that there were long periods of time when we went without a car -- the plates would expire, and for whatever reason, we would not be able to renew them, and then eventually we would get a different car.

11. Any time they disagreed or argued, it was mostly my mother yelling at Paul like he was a kid. Sometimes my mother would slap Paul in the face when they were arguing, and even then, he never did anything -- he would not even flinch. I never saw Paul be violent -- not even with my mother, when she was violently angry, yelling and slapping at him. He would simply say, "What are you doing? I don't really know why you are so mad."

12. When Paul and my mother first met, he was working at Goodwin Brothers Printing Company. When Paul was working, he brought his paycheck home to my mother and asked her to take care of it for him. He never managed his money. Eventually, Paul lost that job, and I do not believe he ever held another job. I am certain that he did not work full time after he lost his job at his family's business.

13. Despite her depression, my mother was a very happy person, and despite her physical difficulties and her drug use, she and Paul had a lot of good times together.

Paul loved my mother very much.

14. For the most part, Paul and my mother lived off of her disability check. She received Social Security Disability Income due to her back injury.

15. My mother did not expect Paul to do anything outside of our house, although she did want him to help her out around the house. Usually she would ask him to turn the television on or off for her, or get her something to drink. Sometimes my mother would ask Paul to make her something to eat. I remember that Paul would make my mother Hamburger Helper. As far as I know, he was able to do that on his own. I do recall that when I was as young as twelve (12) or thirteen (13) years old, I did quite a bit of the cooking.

16. My mother would instruct us to clean up the house. Paul tried to do as my mother asked, but there were some things that he was simply not very good at. He could help pick-up, and he could vacuum, but he got distracted easily. I remember that whenever we were doing chores around the house, Paul would stop and take a break to smoke. At the time, I thought he was just that he was trying to get me to do more, but now I see that he really *could not* do more.

17. Paul never understood how to do laundry. The process of sorting the clothing into different colors or categories of things befuddled him. I know that we tried to teach him, but he never learned.

18. I also remember doing my schoolwork around Paul. Sometimes I would show him things that I thought were interesting and he would just toss it aside -- always making a funny comment. Looking back on how he was, and applying all that I now know, I think Paul responded in that way so that maybe he could cover up the fact that he did not know what I was talking about.

19. Looking back, I know that while I might not have seen it at the time, Paul did not really do anything outside of us. He did not have hobbies or friends, and I do not remember him ever going to meet friends or being interested in doing anything apart from us. Looking back, I can really see some of Paul's developmental delays. He never formed any long-lasting social relationships, and even in our family, where he had opportunities to form some more "built in" relationships, with people like my Aunt Michelle's husband, there was never anything that was a true social interaction. Paul would sometimes take me and my cousins (who lived with us during part of the time he and my mother were together) off to do things -- like he was our big buddy, but he never went off on his own. Paul never planned things -- he did what we -- the kids -- told him to go do.

20. My sister was diagnosed as being Borderline Mentally Retarded when she was younger, so I was familiar with some of the deficits that Paul had when he was living with us. He never seemed like the other grownups in my life. He did not think through things in the same way that a normal adult would, and he was never really able to think through potential consequences.

21. My family suffered a series of losses in 1996 and 1997. Because my family had become like Paul's family, the losses we suffered directly affected Paul. In 1996, my grandmother died. In early 1997, my Aunt Michelle died. Those losses were compounded by mother's death nine (9) months after my Aunt Michelle died. It was a lot of blows all at once. I lost my whole family in a two (2) year period of time.

22. My mother died as the result of a drug overdose on November 15, 1997. After my mother died, I lost contact with Paul. I was a "hot mess" myself, having lost my grandmother, my aunt and my mother within such a short period of time, and I did not have much energy to focus on anyone else. I assumed Paul had returned home to live with his parents, but I did not know for certain. I always knew that Paul's family did not like my mother (and I always felt that, therefore, by association, they did not like me). Even if I had been in a better place myself, I doubt I would have tried to visit him at his parents' house, because I did not feel that they would welcome me.

23. I think it might be helpful for me to share that my overall impression of Paul was that he did his best to be a good father figure to me, despite his deficits and limitations.

He was like a giant teddy bear. It does not shock me at all to learn that he has been diagnosed with an intellectual developmental disability. He was not like any of the other adults in my life when I was growing up, in that he was always child-like. I guess that deep down I always knew he was disabled.

Further affiant sayeth not.

  
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Thea Palermo

SWORN to and SUBSCRIBED in my presence  
this 4th day of December, 2014.

  
\_\_\_\_\_  
Notary Public



MARK A. GREGOR  
My Commission Expires  
September 20, 2018  
Gasconade County  
Commission #14018061