

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

In the Matter of: )

PAUL GOODWIN, )

Petitioner. )

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

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**AFFIDAVIT OF MARY GOODWIN MIFFLIN**

1. My name is Mary Goodwin Mifflin. I am Paul Goodwin's oldest sister. Paul's cognitive functioning is limited, and he needs assistance and support to make his way through life. He does not understand much of what is happening in his life. This is especially true when it comes to his legal situation, the status of his case and his defense.

2. Ever since Paul's arrest, I have had the responsibility of overseeing all that has happened in Paul's case. Early on, Paul asked his lawyers to communicate with me about his case, instead of with him, because he "cannot even come close to comprehending legal matters." Based on everyone's understanding that Paul cannot understand any of the pleadings or legal arguments as explained to him by his attorneys, having me be responsible for oversight of his case has been the logical way to handle things. This has always been the protocol with every attorney we ever had -- even as far back as Paul's trial.

3. I still remember that during Paul's trial, Paul would call me at night and he would ask me about who some of the witnesses were. He would want to know what the gist of their testimony was. I knew Paul did not understand what was happening because during my explanation whenever I referred to a witness who had testified earlier, Paul would not know who or what I was talking about.

4. At Paul's direction, whenever any of his attorneys ever filed anything, or whenever the prosecutor filed anything, his attorneys contacted me. Instead of sending the legal materials and case-related documents to Paul, they sent them to me. Whenever there was a development of some sort in Paul's case, Paul's attorneys would call or e-mail me. This has always been the protocol with every attorney we ever had -- even as far back as Paul's trial, although my responsibilities have shifted from trying to help Paul understand trial preparations and trial testimony to trying to help Paul understand the appeals process.

5. Any time I have had communication with Paul's attorneys, I will try to explain to Paul what is happening, and why. I put whatever the information is in "simple language for him to understand, but honestly, he loses interest so quickly" that he does not take much of it in. I believe it is just "too much work for him to try to understand what is going on legally."

6. Because I know Paul is really not able to understand much of what is happening, despite my efforts to explain things to him as simply and as clearly as possible, I will usually end up saying to Paul, "Well, things are happening, we are moving along." In the end, Paul just wants assurance from me that someone is working on his case, that someone is doing something.

7. Paul does not really even look forward to visits with his attorneys, because he knows he cannot understand what they are going to talk to him about. The only reason Paul ever wanted his attorneys to visit was so that he could get out of his cell and get a soda and hopefully a candy bar. Other than the social, consumption part of the visit with his attorneys, Paul was simply not interested because he cannot understand it. Whenever his attorneys visited, if they tried to talk with Paul about his case, or to review something with him, he would tell them to just give the materials to me. He knows he cannot grasp the significance of what is going on.

8. Just last night, Paul called me. He was complaining that now that he is on pre-execution status, he cannot have ice cream in his commissary order. I was trying to talk to him about what is going on with clemency efforts and I could tell that he was not listening to me. I said, "You aren't even listening to me," to which Paul replied, "No, I am watching TV." I was astounded and saddened. Paul is scheduled to be executed in just a few days, and his interest drifted to the television rather than trying to listen to me explain what is going on with his appeals, because it is just too much for him to comprehend.

Further affiant sayeth not.

Mary G Mifflin  
Mary Goodwin Mifflin

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

Scott A Campbell 12/4/14  
Notary Public

