

STATE OF TENNESSEE)

) ss

COUNTY OF DAVIDSON)

AFFIDAVIT OF KELLY A. GLEASON

I, Kelly A. Gleason, being first duly sworn, make oath and say:

1. I am an attorney licensed in Kentucky, Tennessee, and in the Supreme Court of the United States. I have practiced law for fourteen years, primarily focusing upon the representation of defendants in capital cases. I began work as Assistant Post-Conviction Defender on August 2, 2004. Don Dawson, the Post-Conviction Defender, assigned me to represent Mr. Reid in Davidson County Case No. 97-C-1834 as co-counsel with Assistant Post-Conviction Defender Nick Hare.

2. It is my opinion, based upon my observations of and interactions with Mr. Reid, that he is not currently competent in that Mr. Reid suffers from a severe mental and/or neurological illness which substantially affects his capacity to make knowing, intelligent, and voluntary decisions about his legal situation. I have known Paul Reid for over twenty months and during that entire time, his delusional beliefs have been persistent and have pervaded his thinking about all aspects of his life. His delusional beliefs have caused him to either refuse to discuss legal issues with me, as he believes it is futile, or to discuss only the specific delusional beliefs he holds about his trial attorneys, the trial judges, the jurors, witnesses, courtroom personnel, state and federal appellate courts, the media, the Governor, the President, Congress, Department of Correction personnel – literally everyone.

3. I first met Paul Reid when Connie Westfall and I went to visit him at Brushy Mountain Correctional Complex ["Brushy"] on September 16, 2004. Paul informed me that he knew that I was working with the military government and that he could not believe a single word I said or anything I wrote. He described the military government entering his life in 1985. Since then, he has realized that everyone he has come into contact with has been coached by and sent to interact with him prepared to say certain things and to respond in a certain way to what he said. Paul indicated that he respected my education and intelligence and that he would like to have known me in a normal life but that because he had been a "lab rat" and "guinea pig" for the military intelligence since 1985 that was not possible.

4. I asked in this first visit for Paul to make a list of what he felt that his trial attorneys did wrong or did not do. He refused, since he felt there was no point in that because the trial attorneys and everyone at the trial was coached. Paul said that he had been framed and that he couldn't have done this crime. This is because he was aware that the military intelligence was taping him always and watching his every move. He would not have committed the crimes since he knew that he would be taped if he did so and the military intelligence could use the tapes to prove it.

5. Paul indicated that the military intelligence had monitored every aspect of his life since 1985. He could not have a normal, natural life and express himself to others because of the constant surveillance. In 1985 when the military intelligence entered his life they "got to" people Paul had mentioned or people that they had reason to know about, like family members. Paul indicated that currently the military intelligence was causing ringing in his ears and prickly sensations on his skin.

6. During the entire two hours of our first visit, Paul had not one legal question for me or about his case. Toward the end, he asked me what two words meant, both of which he had written down on the papers he brought with him. The words were “taboo” and “moot.”

7. I next met in person with Mr. Reid on October 28, 2004 at Brushy Mountain. I had not been receiving telephone calls from Paul since the prison was not allowing him to have the phone. Prior to meeting with Paul on that day, we attempted to correct this problem with prison staff. Paul discussed his belief that he Don Dawson, the Post-Conviction Defender, and Nick Hare, my co-counsel, were part of the evil government military. He asserted that Connie Westfall was repeating herself but it wasn't her fault since she was coached by the government military.

8. Paul told me that I had met him last year when Marjorie Bristol, his previous attorney, brought me to meet him. When I said that I had not, he was adamant that no one can “interject anything” into his brain, he had “shut down” the government military’s influence. Paul stated his disbelief that I was a lawyer and asserted that had no way of knowing if I was since everything is controlled by the government military. Paul stated that he knew I had been here before and that was proof that scientific technology is not working. He requested that I meet him “half way” and admit that I am coached.

9. Paul discussed how unfair it is that the government military took away his life and how unfair it is to kill an innocent person. He believes that everyone agrees that but for the government military/scientific technology he would be a lawyer practicing in Houston, Texas today. When he discussed his grades at Volunteer State Community College, I asked who his favorite teacher was. Paul refused to answer because scientific technology is recording everything.

10. During this visit, Paul described heart pains, and pains in his left arm, as the product of the scientific technology people trying to get him to call the doctor so that if he dies of a heart attack which they cause, it will look like a natural occurrence. He said he would not report the pains to medical staff since the scientific technology people wanted him to do so. Paul described the military government putting recurring dreams in his mind of his father and sister Janet being killed. He believes the military government killed his father, who died of cancer in 1997, with scientific technology.

11. Paul believes that “they” told him they had killed his father. When I asked how “they” told him, Paul said that people sitting next to him in the movie theater or a restaurant would speak in “cryptic language” which was intended for him to hear. Paul read from the federal district court transcript of his next friend proceedings an exchange with attorney Mark Olive questioning Paul and stated that Olive’s question “Do you follow me?” was a cryptic message to Paul from the government military. Regarding Olive, Paul noted “if he is a lawyer.” In the margins of the transcript, in his handwriting were notes that Paul made: “there were videotapes, I had to say I didn’t know.” He believes that now everyone knows he’s telling the truth about scientific technology. Paul described how much it hurt for people to believe he was “mentally ill, crazy.”

12. I asked Paul about the papers he brought out with them, asking to see them. He showed a piece of paper on which he had written “REPEAT” and another with “BE CIRCUMSPECT, ATTORNEY’S ARE COACHED TO REPEAT.” Paul described this as helpful in focusing and keeping control of the conversation so that it wouldn’t go into “delusional areas” or irrelevant matters. When I asked if this included the questions I had tried

to ask about his trial, he said yes, [defense attorney] Engle, [Judge] Blackburn, [prosecutor] Thurman, everyone, were all coached and it was all irrelevant.

13. Paul Reid called my office to speak with me and Connie Westfall on November 2, 2004. He complained at length of being a lab rat since 1985. Paul said that the scientific technology runs the internet letter through his head constantly; he hears it read to him. The “internet letter” is his term for the long letter he wrote to the Tennessee Supreme Court in 2003 rendering his life story and his desire to not initiate post-conviction proceedings in his first Davidson County case. Paul said that scientific technology wouldn’t let him sleep at all on Sunday and Monday of that week. He had terrible ringing in his ears.

14. Paul described how scientific technology was causing him other pain by putting a force on his mind to keep him in misery. He described pressure pains on his heart and addressing those by saying out loud “fine, stop my heart.” Paul won’t call for a nurse about the pains. Further, he won’t take any medication. He would feel better if they would just turn off scientific technology. Paul believes that Don Dawson, Nick Hare, and the scientific technology people had him placed at Brushy Mountain to torture him and try to make him insane.

15. Paul described how scientific technology can radiate his body and then use some kind of magnetic tapes to record the activity going on in his brain. They can go back years later and play those tapes and everything about him has been recorded since 1985. He feels “constantly miserable in the brain” and knows his brain is being radiated. It feels like physical pressure.

16. When asked if he knows specifically who “the scientific technology people” are and if they can be tracked down, Paul stated that if I ask whoever coaches me, tells me what to say and do and to repeat myself, that who provide a lead and draw me back “to a nucleus, to a

core, to a hub of people” that are using scientific technology. When asked to describe how I am being coached, Paul cited an erroneous belief that I had repeated a conversation he had with me during a previous visit twice and changed only one small detail.

17. Paul called my office to speak with Connie Westfall, Nick Hare, and me on November 12, 2004. He discussed his recent visit with his sister Linda and Connie and his belief that the visit was a repeat. Paul said he was reluctant to mention it since we were coached to insist that we didn’t remember things happening that way.

18. Paul called my office on November 16, 2004 to speak with me and Connie Westfall. He discussed his recent move to C-block and his belief that it was a repeat. Paul said that “95, 98%” of the time he didn’t mention his knowledge that events are repeating, and he doesn’t mention his knowledge of the repeats to his sisters but he wanted to mention the repeat since it validates what he has been saying about being recorded since 1985. Paul noted that it was better to keep his mouth shut to maintain positive relationships with people.

19. Paul said that scientific technology people bring people to see him and present credentials which aren’t valid to play mind games with him. An inmate told him that Dawn Deaner, who represented him at the Captain D’s trial, was not a real lawyer. Paul said it made no difference to him since the whole thing was a sham. Paul refused to tell me who the inmate was who said that.

20. Paul described times when the scientific technology was lighter than other times as few and far between. He said that if the scientific technology ever got before the U.S. Congress, it would be proven illegal. “They” caused George Bush, Sr. to pass out in 1992 when dining with the prime minister of Japan and George Bush, Jr. to pass out while eating a pretzel in the White House. When I said that I thought Bush, Sr., passed out from taking too much of a

sleeping pill and being sick, Paul described the tape of Bush, Sr., as capturing exactly what scientific technology does. It causes you to become incoherent, lose consciousness, and pass out.

21. When Paul was asked why “they” would want to target the president of the United States, he replied that they wanted to do that for Paul, to have him see they could. Paul said that I would need to ask them “because they are diabolical and they are wicked.” They did the same with Bush, Jr., and Paul knew immediately what had happened.

22. Paul called my office on November 23, 2004 to speak with me and Connie Westfall. He spoke of his desire to minimize people having the opportunity to repeat themselves to him since he knows we are coached to do so. Paul indicated that he was making a grand effort in trying to have a normal and amenable relationship with us under the circumstances. He said “they” ran his relationship with Nick Hare into the ground by placing Nick and Paul at odds with each other. When asked if there is anything Connie or I could do to minimize conflict, Paul said there was nothing we can do as scientific technology wants us to think they run everything.

23. The scientific technology people tell Paul “we got our hand up Kelly’s ass, we’ve got our hand up Connie’s ass, we’ve got our hand up Nick’s ass and they’re our puppets.” Paul said he would use a gentler word but he wanted us to know what they said and digest it. They tell Paul “you’re going to get out of the penitentiary and see your mother’s titties.” They are nasty and vulgar. They coached Judge Blackburn what to say during the trial and Paul knows that because there’s no way that Judge Blackburn could have known to repeat what Paul said from 1985 to 1990 at Ellis II under his breath unless they told her.

24. Paul noted that [prosecutor] Tom Thurman said things during the trial which there was no way he could have known to say unless coached. They had Mike Engle and Tom Thurman stick their tongues out at each other. They had a juror during the Captain D’s trial go

into a jury room where no one could see him with the door open and point his finger at Paul and say “we’ve got you, we’ve got you.” The jurors were hand-picked and coached to find Paul guilty before they knew what he was charged with. Five or six of the jurors in the Clarksville trial made eye contact with Paul after a bailiff intentionally opened up the jury door while Paul worked by. The jurors looked at him and started laughing. Paul knew the bailiff was coached to do that. Paul believes Judge Gasaway could see that episode with the jurors and that Judge Gasaway was coached to say things that no one else would have known he was saying except Paul.

25. Connie Westfall and I visited Paul Reid at Brushy on December 2, 2004. We discussed the results of recent DNA testing in order to determine whether Paul and his sisters shared the same father. Paul believed the test was “a repeat” and the same testing had been done last year [it wasn’t]. When we tried to explain that this was the first test, Paul explained that scientific technology erased information in Connie’s mind so that she couldn’t tell him the results last year.

26. Paul called my office on December 14, 2004 to speak with me and Connie Westfall. He said that he was not permitted to call last week although he had turned his form in, as required by Brushy. Paul said that the visit with Connie and me on December 2 was a repeat, as was last week when the prison told him he hadn’t turned his form in when he had. Paul had written me a letter asking me to make his life retroactive to 1990 and I asked why he picked that date. Paul explained that “they” said he’d leave Ellis II in January 1990 and by March would have his \$25 million.

27. Paul described his life in 1997 during the time he attended Vol State. He said he exercised, worked hard, and spent 3-4 hours per day studying. He was trying to build a

constructive life. Paul said when he was arrested it was devastating, like walking into the twilight zone, and he knew what happened. His life had been controlled since 1985 and he knew the police were sent there by scientific technology. Paul tried to explain to the arresting officers about scientific technology but he didn't have the vocabulary to do so. When he tried to tell them about how they put an orange seed in his navel, they thought he was crazy. Paul said he had also tried to explain scientific technology to Mike Engle and David Baker but they just thought he was crazy.

28. Paul reported that scientific technology had put hatred and anger in him at Joe Ingle (his spiritual advisor) and Jim Simmons (his appellate attorney) and was trying to make him angry at me and Connie but that he resisted since it's not his anger. Paul said that even though he knows everything is a repeat, he only shares less than five percent of that with us. He shares enough to let us know that he knows what "they" are doing and he's aware of the repeats.

29. Paul reported that he had "shut down" the scientific technology from being able to influence or manipulate him, although he can't prevent them from ringing his ears and torturing his mind and body. He no longer feels he needs to talk to Americans since they've been coached to play mind games on him. "They" coach inmates, guards, and staff what to do and say around him. "They" reduced the guards to act like juveniles.

30. I visited Paul at Brushy on December 17, 2004, accompanied by Rosalie Kraft, a legal secretary in our office. Paul reported that scientific technology had transferred David Baker to the federal defender's office and that his legal teams have all been coached to do nothing for him. The Tennessee Department of Correction is also coached. Everyone is coached. Paul said that his mind is still radiated to make it vague and blurry. He contrasts the current state of affairs with the years 1960 to 1985 when his mind was crystal clear.

31. Paul reports that “they” wake him up in the morning unnaturally, energy pumping through him, instead of coming slowly awake and stretching. The radiation in his mind and the ringing varies. Paul said that he can’t believe anything we say and he can’t trust anyone or believe the American vocabulary. His case, all of this is because of scientific technology. The last twenty years have all been nothing but lie after lie. Paul says he has to work very hard not to be upset with me, since he knows I’m coached. The guards are coached, the inmates, the judge, the DA, his attorneys but Paul tries not to pay attention, and instead just stay calm.

32. Paul believes that he was known everywhere he went since everyone is subject to scientific technology, which informs them. He believes that when he first came to Nashville, people recognized him at the grocery store because scientific technology alerted them. Paul is recorded wherever he goes. Because everyone knew him, if he had committed the crimes at McDonalds or Baskin Robbins, witnesses would have called the police and told them it was Paul Reid. This proves he didn’t commit the crimes. Paul provided a list of words he didn’t want anyone to bring up or discuss: “Bi-sexual, queer, Leon, Burnett-Bayland boy’s home, crazy, fucking my mother; sisters, male prostitute, my daughter, #9.”

33. Paul called my office on December 28, 2004 to speak with me. We spoke at length about the various small favors we do for him¹, contact with family members, the status of collections for his Christmas package, and cards he had received. Paul also discussed letters he had written to Judge Blackburn and Judge Todd Campbell in the federal district court. Paul said that the letters explained that his attorneys in Texas in the late 1970’s and early 1980’s had

¹ Mr. Reid, unlike my other clients, is not allowed to avail himself of the level system by which other death row inmates are rewarded for good behavior with increased privileges, including the ability to work and earn a small amount of money. Therefore, I, Connie Westfall, and others in my office routinely spend small amounts of our own money for stamps, cards, and other items which Mr. Reid requires or which would provide some comfort or distraction. We also help arrange for religious groups and others to contribute as well.

coached him to malingering illness.² Paul claims that he proved in Judge Campbell's courtroom on April 29, 2003 that he was not crazy and his sister Linda and attorney Mike Engle had told him that anyone who thought he was crazy now could see he was not. It wasn't even close.

34. Paul thanked me for the help I had given him and I told him that the help I wanted to offer was to get his conviction set aside and get a new trial. He responded that there is nothing I can do since his life is controlled by scientific technology. "They" coach the judges, the DA's, the media, and everybody what to say and do. Paul says there is nothing he can do. He can't believe anything, he can't have friends, he can't have any kind of interaction with human beings. His life was snuffed out in 1985.

35. Paul called my office on January 11, 2005 to speak with me and Connie Westfall. He spoke more slowly than usual and there were lapses in his responses. Paul thanked Connie for all the things she has done for him. I asked what Connie had done to get him a new trial. Paul was taken aback. I reminded him that Connie was an investigator working on his case and it was our job to try to get him a new trial. Paul said he appreciates us but scientific technology controls everything so he doesn't waste his time in those areas. Nothing can be done.

36. I explained that we were preparing for his post-conviction hearing on January 17, 2005 and discussed various problems we had. Paul focused on letters he recently sent to Judge Blackburn, Judge Campbell and prosecutor Thurman in an attempt to prove he is not mentally ill. Paul claimed that his mother and sisters were writing him letters saying they not believe

² I have interviewed Tony Aninao, who, along with Gabe Nahas (deceased), represented Mr. Reid in his Harris County, Texas charges. Mr. Aninao has practiced law since 1979, concentrating in criminal law. He represented Mr. Reid in 1983-1984 when Reid was found to be incompetent at a jury trial and sent to Rusk State for treatment to restore him to competence. Reid had been found to be incompetent in a previous trial when he was represented by Mr. Nahas. Mr. Aninao said that Houston is very conservative and thus it was very rare for a jury to find incompetence twice. Mr. Aninao has represented mental ill clients and malingerers. He said that Mr. Reid is the most severely mentally ill client he has represented. Mr. Aninao does not believe Mr. Reid was malingering and states that neither he nor Mr. Nahas "coached" Reid to do so.

scientific technology is a reality. Paul wanted assurance that if we were contacted by the media we would support his contention that scientific technology is real and Paul is a victim.

37. In discussing whether Paul would testify at the January 17 hearing and what he would say, Paul stated that he shouldn't mention his innocence of the crimes as it might open a can of worms and halt his execution. Paul said he could never say he was innocent publicly. He stated that he would complete his evidentiary hearing, pass with flying colors, and get an execution date. Paul said that his mind and body are all radiated right now, interfering with his sleep.

38. Later in the conversation regarding his potential testimony, Paul recounted how he tried to tell the police about scientific technology upon arrest. His past efforts to expose scientific technology also included a letter to Texas Governor Ann Richards in 1991, passing out 400 pamphlets to citizens in Fort Worth, and trying to tell his mother. He believes the citizens of Nashville already knew him when he came here, just as in Fort Worth and Oklahoma City, and everyone should know that he couldn't have committed these crimes because the government has taped and monitored his every word and physical movement since 1985.

39. Paul said the scientific technology people are wicked, evil, and sinister. Paul can't understand sometimes how we [Connie and I] can't know about scientific technology and do something to get it turned off. Paul wonders if somebody comes to us and says they are the ones torturing Paul with scientific technology. He wonders if we've been taken somewhere and shown the machines or devices and how knobs or switches are turned to keep him under scientific technology. Paul believes there is a panel board and computers and other equipment somewhere.

40. Nick Hare and I met with Paul on January 17, 2005 in the holding tank at the Davidson County Metro Center Courthouse prior to the hearing. Paul told me that I would vindicate him and he would take me to dinner to celebrate by the end of the year. I briefly visited with Paul again to explain what happened after discussions with the court resulted in a postponement of the evidentiary hearing and a Rule 9 interlocutory appeal on competency issues.

41. On January 20, 2005, I met with Paul Reid at Riverbend Maximum Security Institution ("Riverbend"), accompanied by Rosalie Kraft. When I asked how he felt about what happened on January 17, he informed me that it was all a repeat caused by scientific technology. Because he didn't see the judge and the prosecutor, he would not accept that what I said happened was true. Paul explained that Nick and I left the office, got in a car, went to the courthouse and saw him and went back to the office. Paul said that later I returned alone and this was a total hoax, no hearing was conducted, and it was a premeditated repeat. When Rosalie told Paul that she was at the hearing and saw what happened he told her he didn't like her lying to him but he forgives her since we are just puppets coached and controlled by scientific technology.

42. When I questioned what Paul remembered happening during the alleged previous occasion, Paul described a similar event with some small differences he had noted. Paul is not sure if I'm coached to do things slightly differently or I just forget to repeat them exactly. I asked Paul what he meant by saying that I would vindicate him and he said there is nothing anyone can do for him, legal issues are a waste of his time since everything is controlled by the military government. They want to keep him as a lab rat, a guinea pig.

43. Paul called my office on January 26, 2005 to speak with me. He informed me that my visit with him and Rosalie on January 21 was a repeat but it happened with Marjorie and

Rosalie previously instead. Paul discussed the misery of scientific technology torture of his ears, mind and body and the impossibility of having a relationship with a friend, girlfriend, or family member. “They” have made his family like robots and he doesn’t talk to them about the same things he used to discuss. Paul remarked that “they” have me doing a lot of the same things Marjorie Bristol, his last female attorney, did.

44. On January 31, 2005, Connie Westfall and I visited Paul Reid at Riverbend. Paul stated that his trip to Riverbend and events since then have all been a repeat but he enjoyed it since it was better than sitting at Brushy. We discussed the hearing test we’d arranged for him. I asked if he had been able to hear all that happened at his three trials and he said he missed a lot of testimony. We then tape recorded a question and answer session with Paul regarding what he would want to convey in testimony, which was essentially a lengthy discourse about the role scientific technology has played in his life.

45. On February 8, 2005, Paul called the office to speak with me. He thanked me for various things, including sending a book of stamps. However, scientific technology took 18 stamps from him because packages he had mailed to the Governor and the media were blocked by scientific technology. Paul, inspired by our question and answer session, described a “deposition” he had begun in which he is writing an interview between me and him, formulating my questions and his answers. It is his attempt at a concise description of his life.

46. On February 17, 2005, Paul called the office to speak with me. He believes that if scientific technology came through with the previous promise of \$25 million that it would now be \$100 million due to the suffering he has endured.

47. On February 22, 2005, Paul called the office to speak with me and Connie. He described when he first thought scientific technology came into his life at Ellis II and how much

he wanted their promises to be real. He was to have \$25 million, a high rise condo, and be able to meet his daughter. Paul didn't know that his life would be over and he would be a lab rat

48. On March 2, 2005, Paul called the office to speak with me. He explained that "they" put anger and frustration in his mind in a burst and it makes him look bipolar or schizophrenic. Paul discussed the letters he is sending to the federal court as therapeutic. Scientific technology controls that court as well. Paul describes the DNA test as not only a repeat, but the third time the event happened.

49. On March 15, 2005, Paul called the office to speak with me. The guards wouldn't bring him the phone to call me last week and that is a repeat from last year. He once again described the letters to federal court as therapeutic but he wished he didn't have to write them. Paul described the continuing scientific technology on his mind and how it shuts down his emotions. He feels numb now and cannot experience emotions as he did before scientific technology. Paul cannot wait to get his execution date to stop the torture. Scientific technology takes away any passion, any will to fight for himself, any desire to vindicate himself, and "eradicates any inkling to mitigate."

50. Paul described how "they" come back every day and tell Paul he will be a millionaire and that he will win Captain D's and McDonald's cases and go to Texas. He knows they use a code, he gets flickers in his toes and fingers and an orange taste on his tongue. "They" tell him that the scientific technology torture is over and this will be the end but it keeps going on, for twenty-one years now. Paul has reduced them to a juvenile follower and is now too intelligent to fall for it. Paul says he was told in federal court that they were going to turn it off but they didn't. He believes he was told he would be in Texas by June 2003 and get \$100 million.

51. Paul said “they” are coaching all guards and inmates what to say and do. Paul doesn’t want to hear what they have to say since they are all coached. Paul said he won’t listen to any Americans. He thinks the guards intimidate him to fight but he doesn’t react. Paul described living with Linda Patton and how he knew it wasn’t a real life since he knew he was on camera. “They” were watching Paul and Linda so Paul had to be artificial and superficial.

52. Paul described how the guards came to take Paul for a shower the other day and 15 or 30 minutes before the shower, his head was filled with euphoria and joy so that he would be bubbly and vivacious when the guards arrived. Paul knew something was wrong since he couldn’t be happy like that. Paul said scientific technology did it so he would be nice to the guards and then “they” turned it off when he came back to his cell. Paul thinks it is foolish and irrational to think that the scientific technology would stop now. All the past promises were just to manipulate and tantalize Paul.

53. On March 22, 2005, Paul called the office to speak with me. He believes that God will make Tennessee pay for what they did to him. He said he is on death row for seven homicides he did not commit. Paul believes Tennessee, Texas, and scientific technology will all pay for what they did to him. Paul claimed that Connie and I had visited him and when Paul refused to speak with us we got up to leave and threatened to never come back and then he told us he was just teasing. [This never happened.]

54. I asked Paul about being an intern in the FBI office in Fort Worth, a fact I was unaware of until Judge McBryde³ (U.S. District Court, Northern Texas) told me how he came to write the letter to Mike Engle and Tom Thurman about Paul’s efforts to reveal scientific

³ Judge McBryde is the federal district judge who, upon learning in 1997 that Paul Reid was charged in Tennessee, directed FBI agent in charge David Israelson to send information relevant to Paul’s history of severe mental illness to the prosecutor and defense attorney in Tennessee. Judge McBryde found out later that Israelson did not do so, and sent the information himself.

technology to the federal district courts in Fort Worth. Paul refused to discuss this with me, except as to how he met FBI agent David Israelson.

55. On March 30, 2005, Paul called the office to speak with me. He reported that his life was controlled by the scientific technology people. They sent him to Brushy to torture him. They put suicide thoughts on his brain. Paul has acted on them six or seven times. Paul believes the scientific technology people think he is manipulated by the tv. He said the tv does not talk to him. They cannot influence and manipulate him that way.

56. On April 5, 2005, Paul called the office to speak with me. He requested we bring legal pads when we visit so he can continue work on his "deposition." I told him that Stewart Cook was back in the penitentiary in Texas but Paul refused to believe me. Paul said that he cannot tell truth from fiction because he'd been told in 2000 that Cook was in the penitentiary. Paul believes he was also told in 2004 that his mother was dead and that isn't true. Paul believes he has reduced scientific technology to a juvenile follower and "severed the American word." Paul believes that David Baker, Mike Engle, and Mike Jones put him in the penitentiary and Connie and I put him in Brushy.

57. On April 7, 2005, Connie and I visited Paul Reid at Brushy. During this visit, Paul had a yellow sheet of paper upon which he had written in large print: "ATTORNEY'S ARE COACHED TO REPEAT ALL [triple underlined] WORDS." Paul said that Judge Todd Campbell realizes that Connie and I are coached to do what they do and to repeat.

58. On April 12, 2005, Paul called the office to speak with me. He noted that sometimes when I'm talking, he worries I might be able to get a repeat over him without his notice. He doesn't want that to happen so he has to focus energy both on what I'm saying and on trying to hold his questions in check and remember what they are. "They" use me to test him.

Paul believes he has to attack Connie and me in letters to the court as a therapeutic process, which he has only recently mastered.

59. On April 21, 2005, Connie and I visited Paul Reid at Brushy for (as usual at that time) a non-contact visit. We were both subjected to unprecedented invasive body searches of our breast and genital areas. Although prison staff claimed that everyone was searched that way, a group arriving to the High Security unit after us was not searched at all. Paul told us that scientific technology controls all of us. He looked at Connie and called her a liar. He recalled an incident where he remembered cursing me which never happened. I asked him about whether he could concentrate on our conversations given what he told me about not wanting me to “get a repeat past him.” Paul said he could, but only for a limited time. Paul discussed at length why statements about him made by family members in interviews conducted in 1997-1999 could not be true.

60. On May 3, 2005, Paul called the office to speak with me. He discussed the way scientific technology controls his life and all those around him. Paul believes no one is allowed to do anything to him without being coached. Paul went through the long history of promises made by scientific technology. He said they are telling him he is going to win the Captain D’s case but they have lied for so long they can’t affect him anymore.

61. Paul reported that Connie was coached to put her hair in a ponytail fifteen times as a sign that she wanted him to grow his hair long and get a ponytail. He asked me if I would accompany his sister Karen⁴ if she came to visit him at Brushy and I agreed. Paul said that he believes that Judge Campbell will now understand about scientific technology if Paul lays the case out. Paul said he had a nice visit with Joe Ingle yesterday but it was a repeat.

⁴ Karen lives in Memphis, Tennessee and is the only member of the Reid family residing in Tennessee. She has never visited her brother since I have been involved in the case.

62. Paul believes scientific technology chose to focus on him at Ellis II because he stood out. Paul said most of the people there were “wackos” and Paul didn’t blend in since he kept his clothes neat and ironed and his cell immaculate. It hurt his feelings that people thought he was crazy and didn’t understand him. He believes that it is partially his fault -- if he had been more articulate perhaps people would have realized he wasn’t crazy. Paul said that after scientific technology is done using and coaching me, they’ll throw me away. Regarding his post-conviction case, he has “no avenue to exalt” and will not “waste brainpower on it” since there’s no use.

63. On May 12, 2005, Paul called the office to speak with me. He said that the prison had accused him of removing a light cover but it was a repeat. Paul said his letters to federal court can’t accomplish anything but they’re therapeutic. Paul said every word of his is recorded and the scientific technology people can see what he can see -- that’s how they get people to repeat actions. He said when they radiate his body, they sometimes put a black spot in his vision. Paul said that sometimes scientific technology inundates the brain in a subtle way so he doesn’t know it, and shuts down the conscious brain. Paul said that everyone believes everything is recorded, they realize Paul is just telling the truth.

64. I asked Paul why he didn’t want to visit with Jim Simmons and he said there was no purpose. Paul had previously said Jim was “on the road to perdition” and would be “Satan’s house pet.” Paul said Jim is a good person, like me, and Connie, and Nick and Don Dawson but he really upset Paul because he won’t stand up against the scientific technology. Paul claims that Joe Ingle told him that people have no choice, they’re ordered to do it. Paul said he has been inspired by Bud Welch (whose daughter was killed in the Oklahoma City bombing) to learn to forgive.

65. Connie Westfall and I visited Paul at Brushy on May 20, 2005. I noted that Paul had not called as expected on Tuesday and he said that the staff did not bring him the phone as requested. Paul told us about the latest letters he sent to the federal court. He was very angry with us for our alleged lies and repeats. He believes himself to be the center of the greatest military conspiracy of all time, a multi-billion dollar project. Paul went through the long litany of interference in his life since 1985 and the promises scientific technology made and broke.

66. Paul related how when he went to K-Mart or Target the scientific technology took over the security cameras, expecting him to shop lift. Paul said that later “they” told him that if he had done so, the manager would have taken back what he stole and let him go. Paul believes the government military tried repeatedly to get him into trouble. Now, “they” are trying to intimidate him by increasing the times they tell him he’ll go free and telling him how he will spend his million dollars. He requested that we expose the scientific technology although “they” tell Paul it will never happen. Paul would like to have a “deep throat” like in Watergate to expose scientific technology. He wants the nation to know what he’s experienced – the ringing ears, tortured mind, not allowing him to sleep, pricking his body parts.

67. Paul said that as he gets closer to death watch, “they” tell Paul that the real culprit will be caught, he’ll get his millions, and go back to Houston. Paul discussed his last visit with his sister Linda, noting that she was coached to repeat herself. He believes she had instructions from the military government to try to draw him into a fight. Paul said that I had asked him about our feelings if he is put to death, and stated that we had no feelings and haven’t done anything to prove scientific technology exists. He told us to go to hell. Paul then described the “visual effects” scientific technology uses on him to send him messages. He was very agitated during this visit.

68. When I tried to soothe Paul by telling him that another death row inmate at Brushy, Tony Carruthers, supported his complaints of mistreatment, he told me that Carruthers was never at Brushy and ordered me to never again say the name "Carruthers." Paul said that scientific technology was making his mind foggy and fuzzy and it gets worse when he talks with us. Paul believes he no longer needs to rely on the note reminding him that attorneys are coached since he has "reduced scientific technology to followers." Paul accused me of repeating.

69. Paul believes if he tells his sisters about scientific technology, they will get in a fight and no longer send letters or money or come for visits. He said he has no chance for a normal, natural relationship with his sisters. Paul expressed his upset that we can never be honest with him regarding scientific technology. He believes that his father acknowledged seeing the surveillance videos of Paul and speaking with the scientific technology people. Paul told us he wouldn't talk about his past, present, or tv with us.

70. Paul Reid called on May 27, 2005 to speak with me and I informed him of the Tennessee Supreme Court's decision in the Montgomery County case and his execution date. He said the scientific technology people used a lot of rhetoric but it had no substance. He said they won't turn down scientific technology and they won't give him the address of the bank to get his money. Paul said he can't have a normal, natural life where he is not on tv all the time.

71. Paul said that when Mark Olive asked in federal court if they found the real killers, gave him his money, turned off scientific technology, then would Paul want to live?, Paul thought "hell, yes, I'll take that offer." He said scientific technology used Mark Olive and they use me, Connie, David Baker, Mike Jones, Mike Engle, the guards, inmates, and his mother, sisters, and father. "They" spoke nasty of Cheryl Blackburn, Mike Engle, David Baker, and

Mike Jones. “They” said if these were real lawyers, they would be in private practice. “They” said they own Paul.

72. Paul Reid called on May 31, 2005 to speak with me. He would like to show on a tv screen a diagram of the brain and how scientific technology can erase memory, cause amnesia, deprive sleep, implode organs, and record eyesight.

73. Paul Reid called on June 1, 2005 to speak with me. Since Paul believes he has been recorded for twenty one years, he says he has learned to be circumspect regarding his dialogue and selective in his use of words. He said scientific technology had been put on him last night to feel sad, like crying, but he is excited instead. Paul noted that he had erred on April 29, 2003 when he believed that Mark Olive would turn off the scientific technology and he accepted the offer.

74. Connie Westfall and I visited Paul Reid at Brushy on June 3, 2005. He explained that his every word and movement had been recorded since 1985, including every time he had sex, masturbated, and had bowel movements. He repeated his wish that he had a “deep throat” like Watergate but the military government is too powerful and has caused the deaths of John Ritter, John Kennedy, Jr., and his father. Paul described the attempts on the lives of both Bush presidents, the Oklahoma bombing, and the Challenger explosion as a display of the military government’s power directed at him.

75. Paul indicated that the scientific technology had been “stepped up” -- making him angry at us for repeating ourselves word for word and movement for movement, telling him that he will get out of prison, trying to convince him he doesn’t want to die. Paul said “they” want him to pursue his appeals so they can continue the torture. Paul doesn’t want to be taken in again. Paul repeated a lengthy litany of what the scientific technology had done to him since

1985. He offered to send cigarettes to me when I'm in hell, noting that I can lean over in any direction to light them.

76. Paul said he no longer feels anything, even if the scientific technology puts green, orange, purple, and black dots before his eyes and puts orange taste in his mouth. "They" talk directly into his brain, voice to skull. Paul asked if we understand scientific technology and was concerned we don't believe. Paul went through the litany of the military government's attempts to get him to commit suicide.

77. Paul Reid called on June 15, 2005 to speak with me. Paul said scientific technology has been telling him to hate me and to fire me. Paul believes it's a repeat of what happened with Marjorie Bristol and they have coached me to agree to being fired. He claimed that scientific technology is using us to try to raise his hopes of going back to Riverbend. He said the real Paul Reid died in February 1985 and Paul hasn't had any identity since then.

78. Paul described scientific technology's efforts to make him a homosexual at Ellis II. They included having a man who was one of the hundreds of people controlling scientific technology in 1987 to put a thought into Paul's head "let's get naked and get in bed together." Paul wants to expose this to the nation. Paul said he couldn't explain scientific technology at the time of his trials, so he needed to keep quiet about it. Now he believes he can document what has happened. Paul said scientific technology is currently scrambling his thoughts and stopping him from sleeping. "They" tried to get him to copulate with his mother and sisters in 1997 but he wouldn't do that. Paul believes "they" sat his mother and sisters down and told them to have sex with Paul.

79. Connie Westfall and I visited Paul Reid at Brushy on June 21, 2005. Paul had dark circles under his eyes. He went into a very long speech about events in Afghanistan and

Iraq, predicted increased terrorist attacks, and noted that the US will reap what it sowed for what they did to Paul Reid. He demanded we tell him what scientific technology had coached us to repeat to him. I told him we didn't know. Paul said he didn't believe anything we said anyway. He said scientific technology makes his mind foggy, puts orange taste in his mouth, and "pops his anal" to let him know that he's at the "asshole end" of scientific technology.

80. Paul went through the litany of scientific technology's efforts to humiliate and hurt him. He became very agitated recounting all of the affronts. Paul believes the government military showed his family spliced video tapes, piecing words and syllable together to make him appear homosexual. He said everyone is coached, noting that Tom Thurman said Paul didn't wash his face one time and that there was no way Thurman could have known that unless he saw the tapes.

81. Paul said the guards leave out their shirt tails to send him a message that he's at the tail end of scientific technology. Scientific technology has tried to talk to him through the tv but he avoids talking about the tv. He said "they" count the number of times he wipes his "anal." Paul believes the military government would kill Connie and me if we were perceived as a threat to them. He believes if Judge Blackburn would just use "common sense," she would see that Paul didn't kill anyone.

82. Paul Reid called on June 15, 2005 to speak with me. He said there had been news reports that he was in love with one of the jurors in the Baskin Robbins case. Paul said everyone assumed it was a juror who was the most attractive but Paul didn't look at her. Paul said it doesn't make a difference since it was just a "pretentious" trial. Paul said that his statement "I'm not the triggerman" meant that there was no crime. It meant he was not there, as anyone who has seen Westerns knows.

83. Connie Westfall and I visited Paul Reid at Brushy on July 8, 2005. He returned to the Middle East/terrorism theme at length. Paul is still linking those developments to the twenty-one years of scientific technology torture he believes he's suffered. Paul told us he's not sorry for writing the federal court in a letter which he said called each of us "a sack of shit." Paul said we are liars and we tantalize him with promises every week which we always break. During this conversation, Paul became so agitated and deep into his delusions that I could not follow his meaning. From the hallway after we left Paul, Connie and I watched him for several minutes as he stared intently at the wall ahead of him, moving his lips as if in conversation.

84. Paul Reid called the office on July 12, 2005 to speak with me. Paul said that Xavier Amador was coached to say Paul had a broken brain. Paul said that no "private records" say that he is mentally ill. When I spoke about our trip to Houston, Paul told me that I never went there. He complained about me insinuating that he was a bisexual, apparently believing I had done so through some verbal or physical cue.

85. Connie Westfall and I visited Paul Reid at Brushy on July 22, 2005. Paul said the scientific technology was turned down the day before and he had some relief, which allowed him to feel forgiveness. Paul said that he wanted me to represent him in the Clarksville case, if anyone was going to, and I gave him drafts of the motion for appointment and petition and explained the mechanism for filing a post-conviction petition. He said he would read them over later. Paul said that scientific technology had made us ask if he is a member of the Taliban. We denied ever thinking or asking that. Paul claimed to be a master of words who would not run from us if we tried to entrap him.

86. Paul Reid called the office on July 25, 2005 to speak with me. Paul said "they" had turned down scientific technology but they take him through 10-20 extremes per day.

“They” want him to be angry with me but he likes me enough to try not to be. Paul doesn’t like that “they” brought me to him to play psychological mind games with him.

87. Paul Reid called the office on July 28, 2005 to speak with me. Paul said that scientific technology costs millions of dollars and hundreds of people in manpower. “They” went to Houston and knocked on three thousand doors. “They” coached all the people in Ft. Worth, Oklahoma City. “They” have “tortured the world out of” him. Paul complained at length the various things scientific technology has done to him, particularly relevant to women. He said scientific technology would not let him have a girlfriend. Paul said scientific technology makes it look like the attorneys put him on death row but they are just figureheads because scientific technology did it all.

88. Connie Westfall and I met with Paul Reid at Riverbend on August 17, 2005. I had never seen Paul look like this – face pale, nose and eyes red, clearly on the verge of tears. He said that scientific technology was bombarding his brain to make him cry, this was not his own feeling. When I asked why, he said it was a repeat and it brought back childhood memories. Paul had hoped we would show up today although when he reviewed in his head his memory of this happening the last time with Marjorie Bristol, she and Connie did not come. This was a repeat with that difference – we came to see him.

89. I explained that Dr. George Woods would be visiting Paul and I hoped that, since he was trained in neurology, he could find out if anything Paul was experiencing was a physiological symptom. Paul said that the orange taste is caused by scientific technology, it’s not a symptom. Paul detailed the litany of things he can’t do without being filmed and, tears welling up in his eyes, said that after he explains, people will understand he could not have

murdered anyone. He explained at length why he was innocent. Paul said no one believes he could have murdered anyone.

90. Connie Westfall and I visited Paul Reid at Brushy on September 2, 2005. I asked Paul if he liked Dr. Woods and Paul said he did, from the last time he'd met him. Paul thinks he met Dr. Woods at Ellis II. Paul said he recognized him immediately from before and thus knew what Woods was going to say and do. Paul said "the tv doesn't talk to me." Paul went through the chronology of scientific technology entering his life – it began in 1985, in April 1987 they said they would turn off the scientific technology, in June 1987 they had fellow inmate Dino tell him that all his dreams would come true. When I inquired about Dino's real, full name, Paul informed me that he was going to stay on the facts and not play mind games.

91. Paul talked about the conspiracy in Houston in 1973-1982 which he links to people accusing him of wearing "girl boots." He wants scientific technology to go back and see what happened, whether the KKK was involved. Since scientific technology previously sent people to Houston to knock on three thousand doors, they could go back and knock on three hundred thousand doors to get to the bottom of the conspiracy. Paul said scientific technology told Ron Lax that the true number of people involved could go anywhere. He thinks that at least five thousand people all knew about Paul.

92. Paul would like someone like me to be an emissary to go back and investigate the conspiracy which started with about fifty kids and grew into thousands. The conspiracy could then be exposed in the media as bullying in school. Paul thinks this could somehow show that the scientific technology was controlling the warden at Ellis II, the Deputy Governor, Texas Governor Mark White.

93. Paul Reid called to speak with me on September 26, 2005. He discussed his twenty-one year ordeal and scientific technology's current intervention in his mind. "They" are making his mind want to live and feel sad to die. He is trying to focus on every minute of torture during the past years.

94. On September 27, 2005, I visited Paul Reid at Riverbend with Chris Armstrong, an investigator with the federal public defender's office. He repeatedly told us that he was "not affected by the American language." I asked Paul if anything about my representation of him had displeased him. Paul said that my continuing efforts to make his competency an issue were misguided and erroneous, but he understood that I, like everyone else since February 1985, had been coached. He was thankful that Judge Blackburn had "seen through" the experts who said he was incompetent. Paul said the experts had been coached by scientific technology. He said that Dr. Caruso's opinion was as "prosperous" as the charade that Paul and Chris Armstrong had never met before.

95. Although Chris had never met Paul before, when Chris asked him about whether Paul thought that they had met, Paul refused to answer his question. Paul then went through the history of scientific technology's interference with his life beginning in February 1985 at Ellis II. He described how they began taping his every word and to this day people will say and repeat details of his conversations from back then. Paul said there was video and thought surveillance as well. He said one day he was looking at a photo of his mother and his "penis moved." Two days later an inmate came by his cell and mentioned that incident. Paul believes the scientific technology divided up the eight hundred prisoners into four groups of two hundred to provide orientation on how to interact with Paul.

96. Paul said scientific technology had fellow inmate Dino tell him all his dreams would come true. He was to go to the Holiday Inn at I-45 in Houston and pick up \$50,000 to buy a truck. The \$25 million was promised by March of 1990. Instead, scientific technology sent him to the Salvation Army in Fort Worth, where everyone knew who he was in advance since scientific technology monitored him. Paul described the miserable physical effects of scientific technology on his body and mind. He talked about his letters to Governor Ann Richards, the FBI, and Judge McBryde, and his belief that he had proved the truth of scientific technology.

97. Paul said that he got word that in April of 1987 “they” were going to turn off scientific technology but they reneged. He realized this when he woke up to find orange seeds in his navel. Paul spoke about how scientific technology singled him out at Ellis II. He described his life as unbearable and miserable, describing how nasty, dirty, and violated he feels. He was currently experiencing the orange taste on his tongue and orange, green, and purple dots before his eyes.

98. On September 30, 2005, Nick Hare and I visited Paul at Riverbend. Paul described scientific technology radiating and distorting his mind, ringing his ears, and causing “prickering” in his perineal area. He said he has shut down scientific technology and reduced them to juvenile followers. He doesn’t “listen to Americans” and has “shut down the American language.” Paul went through the litany of abuses again.

99. On October 14, 2005, Paul Reid called to speak with me. When asked how he was doing, he said he could be better if he was in Houston or if Mark Olive’s offer [to turn off scientific technology, find the real killer(s), and give Paul his \$25 million] were still on the table. Paul said scientific technology had framed him for seven homicides and put him in prison. He

said that in night court after his arrest, the judge had winked at him to let him know it wasn't real, and not to panic. Paul said he had a chance to speak but he didn't since he would look demented. Paul said that Judge Blackburn also looked at him with a big smile and winked at him when he first appeared in her court.

100. On November 10, 2005, Paul Reid called me at the office. He was concerned that "Satan has taken root" and I didn't like him anymore. Paul has taken some comfort in Martha Stewart's prison sentence as it took some of the sting out of his humiliating incarceration. Paul believes that scientific technology has misconstrued him, though, and had people write Paul and talk to him about whether he is in love with Martha Stewart. Paul said scientific technology has rushed to judgment because Paul doesn't love her, he just thinks she is a good teacher.

101. Paul talked again about imaging graphics which could show how scientific technology affects different parts of the brain. He said that scientific technology can cause people to smell odors, have a taste of orange on their tongue, organs to implode, and rupture arteries in the heart and brain. "They" caused Reeves in Utah to have an aneurysm, as well as John Ritter. Paul said he has been physically in misery since February 1985.

102. Paul said he was "mentally happy" to see his sister Linda but his "agenda is smaller all the time" since he believes he has already proven scientific technology to her. He said Linda knows they're recording him and that's how they coach her to repeat. Paul again described how the jurors were all coached and how, in the Baskin Robbins case, the bailiff opened the door so the jurors could see him. Paul said he was aware the jury was coached and he tried not to act or react.

103. Paul Reid called me on November 30, 2005, saying that he was using his monthly personal call to contact me. He said he didn't want to talk with anyone since they just play

games with him. Paul believes he has learned how to not act or react to scientific technology's attempts to affect him. He said that scientific technology had put into John's [John David Terry, a former client of mine who committed suicide at Riverbend] head to kill himself. Paul said he doesn't know if, in fact, Terry did kill himself, he just knows that I said it was true. Paul recounted events at Ellis II which he perceives as "set ups" by scientific technology. Paul described a letter he received recently from Stewart Cook as a repeat and listed other repeats perpetrated by Connie. He said these make it impossible for him to believe me.

104. Paul said he doesn't want to speak with anyone and takes no pleasure in communicating. He doesn't want anyone to speak to him. Paul said although it's my right to repeat, Paul won't act or react. Paul said he "makes provision" for inmates repeating. Paul went through the litany of scientific technology broken promises again. Paul believes he has convinced everyone of scientific technology. He said that people are in a dilemma since the only conclusions one can draw is that either Paul is telling the truth or he is berserk, demented beyond repair, and no one thinks that is the case.

105. Paul said there is no point to conversation with Connie and me since we work with scientific technology and will do whatever they want. He said he doesn't need to speak with us since we know we're going to lie to him and he knows it too, so why walk into that trap. Paul believes he was silly to have conversations with anyone for the last twenty-one years. Paul then decided he did enjoy speaking with me to enlighten me. He would like for a deep throat to launch a \$40 million investigation into scientific technology, like Whitewater. Paul said several times "the tv doesn't define me."

106. Paul described Judge Campbell using “body language” at the federal hearing in April 2003 to send Paul messages. He believes he was coached to do so. Paul said Kathy Morante used body language as well, to say it wasn’t real, and not to panic.

107. On December 7, 2005, Paul called me at the office. He noted that he wasn’t mad at me “per se” but I’ve had his case for thirteen months and done nothing for him. Paul wanted to know if I was “telepathic” when he was in Houston and I was in Kentucky and whether I had been thinking of him then. Paul described his life in Houston at great length, believing that thousands of people around him were part of a conspiracy against him there from 1973-1982. Paul believes, since this conspiracy predates scientific technology, it must have been private citizens – bankers, housewives, oil workers -- who were focused on his every move. He asked me to see if I could find answers to this.

108. Paul believes the Houston conspiracy disrupted many lives. He said people had to pack up and move and that two hundred family members could have been displaced because of this. Paul said one family that was affected was a working couple with a baby who lived across the street and packed up and left. Paul said a policeman neighbor slept with a gun by his bed. Paul wonders who were these people and who were the people in the field asking questions about him then? Paul speculated that perhaps a half million people were affected. Paul said that David Baker said Paul had to know what was going on but Paul said he didn’t know, this all happened behind his back.

109. Paul believes some good came out of this conspiracy though, since he got special privileges and people to watch out for him when he went to jail as a juvenile. Paul said that David Baker thought the cause of this was Paul marrying a girl outside his group. Paul wishes I could have been there to record it all. He describes this as “so big” that people he didn’t know

would come up to him and shake his hand, saying that they had been wanting to meet him. Paul said when scientific technology told him that all his dreams would come true in 1987, he wanted people to go to Houston to expose this conspiracy as a hate group.

110. On December 15, 2005, Connie Westfall and I visited Paul Reid at Brushy. Paul told us he didn't believe we had called his family about the execution date back in October. He recounted our "lies" to him and the "repeats."

111. On December 22, 2005, I received a phone call from Paul Reid. He recounted the long history of mean, dirty, evil, and nasty scientific technology torture. "They" lie to him every time they make promises about the end of the torture. He asks himself when it will stop and the answer is never but they still try to manipulate him. Paul believes he has them over a barrel when he has an execution date, since it shows they don't control him.

112. Paul believes his acquiescence to scientific technology over all these years is worth \$100 million today, not the \$25 million originally promised. He said that he made choices off of scientific technology, even though he hated them by 1988-89. Paul said scientific technology broke all his car engines and air conditioners from 1990-1997. Paul said he has given up and is just looking for a place to lay down and die. Paul believes "they" tried to get him to cop to a life sentence but with scientific technology, there is only torture. Paul said he was not interested in a deal because he will not cop to something he did not do.

113. Paul said scientific technology had an inmate tell him the other day that Paul's meeting with George Woods in August 16 [it was on August 18] was a repeat and that Paul was supposed to repeat himself to me. Paul recounted the times between 2001 and 2003 when scientific technology tried to get him to kill himself. He tried to hang himself seven times and drank cleaning fluid. He said now he has them over a barrel since he has an execution date and

the scientific technology will come off. Paul said he has taken the power and control from them by not listening to any human being. Paul believes he has “shut down all 290 million Americans and the American language.”

114. Paul said scientific technology had his sister Janet tell him he would beat all three cases and have a house with a fireplace. “They” had Ron Lax say in 1998 that Paul would win all three cases hands down. Paul believes the scientific technology tried to wear him down to back down from the October 5, 2005 execution date and will do so in June 2006 as well. Paul believes that I will try to get him to sign papers and that his family will cry but it will be nothing but a lie -- scientific technology will tell him he needs to sign the papers but it’s “just lie, lie, lie since 1985.” He said all “they” do is manipulate and tantalize him. Paul said “they” have abolished any dream or vision from him. Paul said “they” have increased the pressure on his ears and brain as he is speaking with me, making it worse.

115. Paul Reid called me at the office on January 4, 2006. Paul repeated his belief that he has “shut down” the American people and language. He named various “lies” since April 29, 2003 and reiterated that the tv does not talk to him. Paul said he wants to get scientific technology 100% out of his life. Even in the free world from 1990-1997 “they” made him miserable. He said when he came out of classes at Vol State, “they” would put scientific technology on him to make him forget where his next class was. He described Don Dawson as his “adversary.” Paul also believes that he “fired” Dr. Pam Auble because she had lied about him.

116. On January 18, 2006, Paul Reid called me.⁵ He recounted how since 1985 he had “no human being relationships.” Paul believes that since 1988 all of his family have “played psychological mind games” on him. He said scientific technology is now trying to plant thoughts, like the idea that Paul is autistic. Paul believes scientific technology has come in to his room and removed some of his papers. He said “they” are coaching me to try to make him beg to send some paperwork which I previously sent and “they” have taken.

117. Paul reported that he is still working on his “deposition” and wants fifteen copies so he can send it to his family, the media, and the courts. Paul said that scientific technology tormented his mind last Thursday after Connie and I left the prison. He said that since his life is recorded on camera, he does not act or react to things. Paul said he didn’t know how to act when he was arrested for seven murders but he knew everything was recorded, so it would be okay. I told him about the upcoming Max Soffar trial in Texas and Stewart Cook’s expected testimony.

118. On January 26, 2006, Paul Reid called me. Paul told me that what I had said about Max Soffar and Stewart Cook was a repeat from last year. He said I told him last year that Max Soffar was found guilty and back on death row. Paul said he expected me to deny I told him this since everyone is in denial and no one will take Paul’s side. He said, for this reason, he realizes that it’s ridiculous to get in conversation with anyone since everyone is “preprogrammed.” Paul said that Connie asked him about putting ice cream in the microwave and there is no way she would know that unless scientific technology told her. [Connie did not ask about this.]

⁵ Connie Westfall and I visited with Paul Reid at Brushy on January 12, 2006. At the moment, we cannot locate the notes from that visit. This is also the case for our visit with Mr. Reid at Brushy on October 28, 2005. Although we normally put our notes into memo form, due to our heavy caseload, we have been unable to do so at times.

119. Paul said that he has “shut down” the whole scientific technology program. By “shut down” he means that he refuses to be influenced. Paul gave as an example my telling him about a suicide at Brushy.⁶ Paul refuses to believe that someone hung himself in his pod unless he saw it himself. Paul accused me of being coached to tell him that. Paul said “there is no one in my world” and this is painful and awful. He said he takes no pleasure in dealing with others but he does enjoy speaking with me. Paul believes if his life had been normal he would have passed the bar in 1995 and be a leader of his law firm in Houston. Paul said it was still possible for him to have a normal life if scientific technology had kept its promise that it would be turned off in April 1987.

120. Paul Reid called me at the office on January 31, 2006. Paul reported that, because of the execution date, scientific technology was bombarding him with thoughts of being upset and cursing out Connie and me. He said that when we hear the tapes, we can tell it’s not him. [By this, Paul means that he believes we review tapes of him in his cell that the scientific technology has made.] Paul claims that I threatened to take his tv away from him if he wouldn’t answer my questions. When I denied ever saying any such thing, Paul described an incident which never happened. He said that when we visited him at Brushy, I threatened to take the tv and then HSA unit manager Steve Cantrell came to the door and told Paul that he would have to answer my questions or he would take the tv. Paul believes that he had brought this up to me before. [He has not.]

121. Paul said that scientific technology put it on his head for three days recently to think that the people running scientific technology are “lesbian, homosexual bachelorettes” and that they like Paul liking me and Connie. He said that they normally like him to like only men,

⁶ On January 15, 2006, Robert Campbell, an inmate in A Pod with Paul Reid, hung himself and died.

not women, and had done that for two or three years. Paul said “they can’t make Paul Summers a homosexual.” [He meant to refer to himself, but misspoke.] Paul believes that scientific technology has tried to get Paul [Reid] into that lifestyle and has tried to control his sexual thoughts.

122. Paul believes scientific technology has tried to turn him against Connie and me. He said “it’s not wrong if I want to do that, but there’s only you and Connie in my life.” He does not want to alienate us since we help him. Paul said they had put tv back on his head. He is made to think about the Lawrence Welk show and the guy who produced the bubbles.

123. Paul said that Pam Auble “defiled me for one hour on the witness stand.” Paul believes that she was set up to do so by scientific technology and that David Baker told him that. Paul said he shook her hand when he went past the witness chair and a bailiff put his left hand on Paul’s elbow. He said three things occurred because of this: 1) “they” wouldn’t let the bailiff come around Paul anymore since he put his hand on Paul, 2) people called in to the tv stations to say it was strange that Paul would thank Auble for defiling him, and 3) David Baker said Paul was supposed to bad mouth her, instead he did the opposite. Paul closed the phone call by saying “we’ll fight against the evil scientific technology, even though they are trying to get me to hate you and Connie.”

124. On February 3, 2006, I received a phone call from Paul Reid. Paul said Joe Ingle had been there but Paul preferred speaking with a female. Paul noted that he tried to develop a relationship with Connie and she came very close to Paul revealing the identity of his daughter in Texas. Unfortunately, Connie “started a series of lies and pushed me away.” Paul believes it is senseless to establish a relationship because you have to have trust and he has none. Paul said Joe Ingle had asked if I lied to Paul and Paul told him that I was just in denial.

125. Paul described himself as a “lifetime lab rat.” He recounted again how he had been tantalized by scientific technology’s deception and lies. Paul decided he didn’t want to talk about scientific technology and asked a few questions about my family. He then described how “blessed” and “wonderful” his childhood was in Houston. Paul noted that Connie and I said we went to Houston but he doesn’t know whether we did. He said, for all he knows, we could have gone seventeen times. Paul said scientific technology told Connie to tell him she was going every week. Paul thinks scientific technology wanted Paul to ask Connie to look up other people. Paul said that he was more “reserved” after scientific technology entered his life and that he put out fabricated information to throw them off. Paul said he wanted to believe in Connie but her lies caused him to withdraw and give up.

126. Connie Westfall and I visited Paul Reid at Brushy on February 9, 2006. I tried to take a dictionary to him but the prison refused to let me bring it in. We were also asked to leave earlier than in the past. During the visit, Paul looked up and said that an officer was staring at him and was coached by scientific technology to try to intimidate him. Paul said he was the “only being in America” to experience what he is undergoing -- he is “the first, the template.” Paul said that Mark Olive had promised in April 29, 2003 to shut off the scientific technology, find the real killers, and give him his promised money. Paul thought federal court was the “real deal” and this would happen.

127. I received a telephone call from Paul Reid on February 16, 2006. Paul said that he sang “Indiana Wants Me” to himself in his cell at Ellis II and “they” sent an inmate to tell Paul that Paul had never been to Indiana and no one there wanted him. When he sang “I Shot the Sheriff,” “they” sent an inmate to say that Paul Reid did not shoot a sheriff. Then “they” sent Connie up to talk with Paul about the song. [Connie has not asked about the song.] When I

spoke with Paul about his mother's recent stroke, Paul accused me of saying the same thing last year at Christmas. Paul said he's just become stoic [about my repeating] and he "will not produce a response."

128. Connie Westfall and I visited Paul Reid at Brushy on February 23, 2006. Paul spoke about how much he enjoyed living until 1985 and now what they do to ears, mind, and body is unbearable. He said scientific technology took all people out of his life and that's one of the worst things to do. Paul now believes that thousands of people may have been affected by scientific technology. These include Bush Sr., Bush, Jr., Bill Clinton (they twisted his knee), JFK, Jr., and the Space Shuttle blowing up in Texas. He said the largest effect has been on Paul. Paul again reviewed the scientific technology attempts on his life.

129. Paul believes we have told him several times that he is autistic. [We have never said that.] Paul said his life is pure torment. Paul said he has had "no roots in human beings" in twenty one years. Once again, Paul said I threatened to take his tv if he wouldn't answer my questions. Paul said that I am coached to come up to Brushy and give him stern looks and harsh stares. He believes God has given him mental strength so that I cannot "defeat him."

130. I received a telephone call on March 9, 2006 from Paul Reid. Paul said that David Baker told him that Paul would be a better lawyer than David. I mentioned developments regarding the Soffar trial in Texas and Paul told me that I had told him last year that Soffar was tried and sentenced to death. Paul then ruminated on his own trial, wondering how a prosecutor could convict someone he knew to be innocent. I asked Paul about a conversation he had with Stephen Hugueley, another inmate at Brushy. Paul said Hugueley had been coached to taunt him. Paul stated that it was stupid for him to get involved with human beings since everyone has

been coached since 1985 what to say and do. Paul believes he has been “a stupid fool” to “interact with the humans.”

131. Paul said scientific technology had coached Connie Westfall and me to tell lie after lie to make Paul “go off” and fire me. Paul tries not to let it “build up” since it would do no good. Paul said scientific technology doesn’t understand that Paul will not let it build up in him. Paul said his mother has been coached since 1988. Paul wants scientific technology out of his life, to go back to Unit 2 at Riverbend, and to have an “emissary” in Houston to gain a broader understanding of his life there.

132. I received a telephone call on March 31, 2006 from Paul Reid. He said God has given him supernatural powers to resist scientific technology. He said he has reduced scientific technology to a follower and “taken human beings out of the equation.” Paul realized that the only way scientific technology can influence him is through human beings, so he has shut them out. Paul says he knows that he is still a “lab rat and a guinea pig” but “they can’t experiment on me to make me act and react.” Paul described an incident where he was coming out of the shower and scientific technology tried to fill his head and make him yell “nigger, nigger, nigger” but Paul did not act or react.

133. Paul said scientific technology can make people do things they don’t want to do – sin, kill people, go off on their wife. “They are probably doing it in all fifty states.” Paul worried about the people who do not know about scientific technology. Scientific technology could cause a person’s mind to get angry and upset and go off on another person. The other person would walk off thinking “that guy needs professional help.”

134. I received a telephone call from Paul Reid on April 12, 2006. Paul was enthused about his efforts on the “deposition” which is now around four hundred seventy-five pages describing his life up to age twenty-six.

135. Connie Westfall and I met with Paul Reid at Brushy on April 13, 2006. Paul believes that Pam Auble and Judge Cheryl Blackburn had notes from scientific technology during his trial. He thinks they were “working in conjunction” and the theme was to get the whole story out. Paul said that Chris Clark and Jennifer Krause told all about it in their reports. He said scientific technology had them run the story.

136. Paul said scientific technology coached his attorneys to work with the District Attorney and put him in the penitentiary. Paul said he should never have been indicted, he’s been set up from the beginning. Paul again recounted scientific technology’s efforts to kill him, adding a couple of events I don’t recall him mentioning before – in 1988 putting nitro in his drink, and in 1996 putting broken glass in the sink when he worked at Shoney’s. He added that they’re putting scientific technology on his heart now to stop it.

137. Connie Westfall and I met with Paul Reid at Brushy on May 4, 2006. We didn’t know about the Supreme Court’s decision at the time. Paul was very upset and clearly in great discomfort due to gloves (actually cloth-covered hard tubes) placed on his hands, which are already restricted by cuffs and a black box. We agreed to a non-contact visit if the guards would remove the gloves. Paul repeated his usual litany of scientific technology interference in his life.

138. I received a telephone call from Paul Reid on May 11, 2006. I informed him of the Supreme Court opinion and the June 28, 2006 execution date. After I described the opinion and the factual errors therein, Paul asked me if the scientific technology told the Tennessee Supreme Court to mess everything up so that they [scientific technology] would get more time to

torment Paul, because the Sixth Circuit or some other court would believe they needed to fix the Tennessee Supreme Court's errors. I informed him that I would be filing a next friend petition.

FURTHER AFFIANT SAITH NOT.

Attest: _____
KELLY A. GLEASON

Sworn to and subscribed before me on this the ____ day of May, 2006.

My Commission Expires: _____

NOTARY PUBLIC

State of Texas)
) ss
County of Galveston)

AFFIDAVIT OF LINDA MARTINIANO

I, Linda Martiniano, an adult citizen of League City, Texas, being first duly sworn, make oath and say:

1. I am Paul Dennis Reid, Jr.'s sister. I reside in League City, Texas with my husband, Frank Martiniano.

2. Since my brother has been incarcerated in Tennessee, I have traveled on several occasions to visit with him at Brushy Mountain state prison in Eastern Tennessee. The Office of the Post-Conviction Defender has assisted me in arranging these visits.

3. I have timed my visits with Paul, my younger brother, around his birthday. My last visit was on November 9, 2005. The previous visit was November 9, 2004. I also visited Paul with our mother, Jonie Sowl, and my husband Frank, on November 11, 2003.

4. In addition, to my visits with Paul, I also receive letters from him on a regular basis.

5. Based upon my visits with Paul, the letters I have received from him, and my knowledge of Paul, I believe that Paul is severely mentally ill. He does not think or act in a rational manner. It seems that everything he does is guided by his belief in a government conspiracy against him to bombard him with "scientific technology." When he has talked about giving up appeals and being executed, he talks about ending the torture of the scientific technology.

6. Because I believe Paul is not capable of making a rational decision, I have

requested the Office of the Post-Conviction Defender and attorneys in that office to represent me so that I may act in the place of my brother to protect his interests. My intent is to act in my brother's best interests. I love him and do not wish for him to be executed or abandon his appeals unless and until he can make that decision as a competent person and not as a product of his severe mental illness.

FURTHER AFFIANT SAITH NOT.

Attest: _____
LINDA MARTINIANO

Sworn to and subscribed before me on this the _____ day of May, 2006.

My Commission Expires: _____.

NOTARY PUBLIC

STATE OF TENNESSEE)

) ss

COUNTY OF DAVIDSON)

AFFIDAVIT OF CONNIE WESTFALL

1. My name is Connie Westfall. I am a resident of Williamson County, TN and am employed as an investigator for The Office of the Post-Conviction Defender in Nashville, a position I have held since May 1, 1996.
2. I was assigned to the Paul Dennis Reid case on May 1, 2003. I had my first visit with Mr. Reid at Brushy Mountain State Prison on May 9, 2003, in the company of his then attorney, Marjorie Bristol.
3. On May 29, 2003, I visited with Mr. Reid for the second time. From this date through September, 2004, I visited alone with Mr. Reid approximately every other week, the exceptions being when I was in the field investigating on behalf of Mr. Reid or other clients. Since September, 2004, one month after Ms. Kelly Gleason was hired as an Assistant Post-Conviction Defender and assigned to the Reid case, the two of us have traveled together to visit our client. Other than when we are required to be in the office, working in the field or in hearings, we have maintained our bi-monthly visits with Mr. Reid.
4. Since Mr. Reid has a lengthy history of severe mental illness, in addition to my regular responsibilities as an investigator, in this case I was asked to monitor his mental state and attempt to maintain a relationship of communication and trust to the extent possible. Further, I was asked to monitor his living conditions and to interface with prison officials on his behalf. In addition, I was to develop and maintain a relationship with his family, to facilitate family visits and to otherwise encourage regular contacts between them in an effort to strengthen the family's ties to our client.
5. Because the Department of Correction continues to refuse requests to return Mr. Reid to Riverbend Maximum Security Institution in Nashville, visitation with Mr. Reid necessarily involves extensive travel and time. In my observations of Mr. Reid over the last three years, it is apparent the isolation to which Mr. Reid is subjected at Brushy Mountain State Prison has contributed to the deterioration of his tenuous and fragile mental state.
6. On May 29, 2003, Mr. Reid spoke at length about the conspiracy against him perpetrated by the "government military." He told me of the torture he suffers from the "scientific technology" used to "entice" him to "act or react." He explained his reasons for believing the seven homicides were committed by a professional hit man at the behest of the government and their reasons for doing so.

7. Also on May 29, 2003, I explained to Mr. Reid my role as his investigator. In response, he expressed confusion as to the role of our office in his post-conviction. Having witnessed Ms. Bristol's explanation, nevertheless, I drew a diagram of the three levels of appeals – trial, post-conviction, federal – then explained what our office does. Seemingly satisfied with the explanation since he asked no further questions, I apprized him of the need for him to stay in touch with his attorneys to discuss the legal aspects of his case. I told him that I am not qualified to answer his legal questions or to explain the complicated processes of his three cases or their movement through the court system.
8. From May 29, 2003, until February 19, 2004, Mr. Reid and I did not discuss his case; his only interest was in educating me to the government military's control over his life since 1985 and the effects of the "scientific technology" used to torture him.
9. On February 19, 2004, I escorted Jay Williams of Shiff-Hardin, LLP in Chicago to Brushy Mountain to meet Paul. The purpose of the visit was for Williams to secure Paul's okay for the firm's pro bono representation of him in the Captain D's post-conviction case and to discuss the legal plan for the firm's involvement.

During the introductions, Mr. Reid was made aware of the firm's location in the Sears Tower; apparently intent on impressing Williams with his broad base of knowledge, Reid launched into a long and detailed discussion of Oprah Winfrey from her early life to her multi-level condo; the locations of the world's tallest buildings, the geography of the Lake Michigan area, TV programs and the stock market.

Mr. Williams listened patiently before attempting to direct the conversation toward his reason for being there and its importance to Reid's case; but before he could fully explain, Reid nodded his agreement without comment then resumed his prepared remarks. Paul displayed six or seven legal pads filled with hand-written words and their definitions, from which he read.

Reid then explained to Williams that he has "an atrophy of the brain," noting "a component of [his] brain had deflated." Reid revealed aspects of his personal history, including his congenital deformed left ear and his cosmetic surgeries before resuming his discourse on words and their meanings, his "A" average in "law classes," his continuing efforts at self-education, personal health and fitness and his belief in God.

When Williams pointed out the short time available to discuss his case, Paul held up his index finger and told him he'd get to that in a minute; he returned to his in-depth discussion of Oprah Winfrey. Preparing to leave, Williams asked again if he had Paul's permission to represent him, Reid agreed and we left.

10. On September 16, 2004, Kelly Gleason and I traveled to Brushy Mountain for her first meeting with Reid. On this day, Gleason asked Paul to put in writing what he believes his trial attorneys could have done in order that she better understand his

feelings about the case. Paul refused her request stating it doesn't matter since the government military is in control of the judge, prosecutor and all the attorneys.

11. On October 12, 2004, Nick Hare and I visited with Reid. Having recently returned from Houston working on his case, I had photographs of familiar landmarks to leave with Mr. Reid. He informed me that I sent the same pictures to him last year; queried about the dates printed on the photos, Paul explained that the scientific technology had changed the dates, he didn't know how but is certain they have the technology based on what they have been able to do to him. By the end of the visit, Paul stated he does not believe I have been to Houston at all and everything has been orchestrated by the government military.

Hare asked Reid to explain to him what he wanted him to do as his attorney. Reid said there was nothing he could do as he was controlled by the government military and if he could do anything, the only thing he wanted was for Hare to get the scientific technology turned off.

12. On October 28, 2004, Gleason and I again visited Reid; now he accused the head of our office, Don Dawson and attorney Nick Hare as being "part of the evil government military" and he "holds them accountable." Paul also made numerous references to my "repeating," that is, saying exactly the same things, using the exact movements and expressions, all of which usually occurred "last year." Further, he stated that Marjorie Bristol brought Gleason to meet him "last year." Reid asserted that he no longer believes anything from any source outside himself and "that no one can interject anything into my brain." This was the beginning of Paul's concerted effort to reject anything and everything from outside himself.

Gleason asked what she said this year that is different from last year; Reid accused her of "playing mind games" and doubted that she is an attorney; he stated his belief that she is controlled by the government military and was sent by them. Further, Reid claimed, Bristol brought Williams to see him the year before. Inside a folder he brought out with him were papers upon which Reid had written in large letters, "REPEAT" and "BE CIRCUMSPECT, ATTORNEY'S ARE COACHED TO REPEAT." Reid refused to discuss his case; his interest was to detail the government military's control of his life and to note other cases of individuals repeating their exact words and actions.

13. On December 2, 2004, Gleason and I returned to Brushy Mountain to meet with Reid. Gleason broached the subject of the DNA test to ascertain the siblings' paternity; Paul was not interested as he said it was a "repeat" of last year and he already knew the results although he would/could not tell us what they were. Reid now claimed that I repeat everything I say to him "99% of the time."
14. On January 18, 2005, I visited with Reid alone at Riverbend; he was transported to Nashville for a hearing held in Judge Blackburn's court the day before. From the onset of the visit, Reid said many times that the court hearing and all that was said

was a “repeat” from last year; in addition, each thing we discussed today was a “repeat” from before with the exception of the last minute arrangement to keep him at Riverbend for two more weeks. Reid couldn’t understand why the government military would “alter the plan” but supposed we’d find out.

The most important thing on Reid’s mind was his desire to make sure the world can see that scientific technology is being used on him, noting quietly that “it was fifteen years ago today that [he] thought [he] would be out, go to the Holiday Inn to collect twenty-five thousand dollars and then get [his] twenty-five million.”

Reid reminisced about his life in Texas, people he knew there and their treatment of him; he believes the government military arranged it all, always watching the “lab rat” to see how he’ll “act and react,” “enticing” him to date rape, steal and do drugs. He reiterated his oft-expressed idealized version of “what if ...?” If the government military had stayed out of his life he would have several law degrees, be practicing in a large Houston law firm, have a beautiful wife and family and be living in a mansion.

Reid believes that the information gathered by investigator Ron Lax could have been used to “map out [his] traits – to formalize what [his] character is” which, to Paul’s thinking, would prove he is incapable of violent acts. But the government military kept him in poverty to cause him to “do something.” As an example, Reid claims to have been in a Nashville bank when a teller “threw \$5000 over her shoulder” and said to him, “Five thousand dollars isn’t anything!” Reid avers the teller was coached by the government military because they “wanted [him] to rob the bank!”

I managed to break into Paul’s relentless dialog long enough to show him a list of questions he had prepared for Gleason to ask him; he expressed his concerns the evidentiary hearing would “turn out to be a repeat” but had prepared the questions in case “it was the real McCoy;” he had no interest in going over the questions with me.

According to Reid, everyone at the court “repeated exactly what they have said before,” including the bailiff and court officers, “It’s all a big sham, even the weather is identical!”

Reid then stated his belief there was no hearing and Rosalie Kraft, a legal secretary in our office, and I were not in the courtroom; further, Gleason and Hare were in their offices, drove to the courthouse to meet with him then drove back; later in the day Gleason alone drove back to the courthouse to meet with Paul.

To further support his claim there was no hearing; Paul referenced letters he sent to Governor Bredesen, TV Channel 5 and *The Tennessean*. He believes his letters were “stopped at Brushy” because had Bredesen received the letter, he would have “acted immediately to have [Paul] relocated back to RMSI.” Paul believes the governor, “incensed, would have gotten on the phone to reprimand all those who played a part in this expense of taxpayer money!” He linked the problems of funding TennCare

with the expense of housing him at Brushy, by Paul's estimation "the \$168,000 spent on nonsense."

Additionally, Reid stated matter-of-factly, if there had been a hearing and the media received his letters, there would have been a "media frenzy – it would have been headline news."

15. On January 31, 2005, Ms. Gleason and I again visited with Mr. Reid at Riverbend. The degree of "happiness" Reid exhibited this day was something I'd not seen before, although he became more intense as the visit progressed.

Paul wanted me to look into his eyes so I would "see the boldness and the leadership which is a gift from God created after the scientific technology was put on [him]." With only a few short glances away, Reid and I maintained constant, steady eye contact during his long discourse; this made it impossible for me to make significant notes of the encounter. I don't know how much time passed as I was determined to look for as long as he needed the eye to eye contact.

Reid reminded us that when Rosalie Kraft was there with Ms. Gleason the week before, she was coached to say that was the first time she'd been to Riverbend but he knows "she was there last year." Reid seemed proud to say he no longer makes a big thing out of the repeating and rarely brings it up "because what good can it do?" He then said Gleason is coached to say and do exactly the same things Marjorie Bristol did last year [Bristol had been off the case for over a year and a half.]

Much of the discussion centered on Reid's conditions at Brushy Mountain; he claims not to initiate any conversations with the guards or other inmates since they all are coached by the government military to say and do things to cause him to "act or react." He claims items have been removed from his cell at the direction of the government military; the scientific technology "radiates" his brain making his thinking "fuzzy and foggy," he becomes "confused" and can't "think vividly clear;" they interfere with his sleep, ring his ears and "flicker" his body; he believes every moment of his life is recorded; they repeatedly run the same dreams through his head; he believes inmates and guards repeat the exact words and actions as the year before, they scratch their heads in the same manner and use their eyes in the same manner. All this and more is to get him to "become a wild man, a mad man, to go off on the officers, to start fights with inmates" but Reid has learned to overcome the scientific technology.

Reid believes scientific technology "can remove memory thoughts from his brain," they can remove situations and cause him to forget, they can place thoughts and images inside his head, and they coached his family to encourage him to believe he would receive twenty-five million dollars upon his release then taunt him with their wealth, homes and expensive living. He believes the government military brought women into his life after his release from TXDOC, to entice him, give him money then leave him. He believes the government military interviewed thousands of people

in Texas, Oklahoma and Tennessee; therefore, he was known to everyone with whom he came into contact; he believes everyone is coached by the government military and told how to act and what to say around him. Reid believes the government military has unlimited resources and power, using them to send cryptic messages to him, such as causing an airplane to crash on his birthday, to blow up the Challenger space craft over his home state of Texas, they caused both Presidents Bush to choke, they intended for him to be at Oklahoma's Murrah Federal Building when it was bombed, they caused JFK Jr. to black out and crash his plane.

16. On February 17, 2006, Ms. Gleason and I met with Paul again at Brushy Mountain. While he was at Riverbend, Gleason had arranged for a hearing test for Reid; he wanted us to know that he was very appreciative but the same lady had tested him with the same results one year before.

Reid also wanted me to know that he knows I was coached to "repeat" everything I said when he called from Riverbend.

Paul wanted Kelly to know that she is coached to "mimic Marjorie Bristol."

Reid went on to say that he has to tell us because he has "to release it or Satan will plant a seed and the scientific technology will try to start a war." He claims that if he looks us "directly in the eye" and says what he believes the scientific technology is coaching us to do; he can "stay pure and clean."

Reid is proud that he "forges [his] own avenues and [doesn't] follow others;" he claims that homosexuals are all around him but he won't be one; he's "not going to talk effeminate with a high voice," he claimed he won't mimic that behavior because he used to [when he was "facetious"] but learned there would be consequences.

Reid launched into a long, convoluted story alleging that I asked him if playing cards leads one into gambling; he detailed his past experience playing cards ending with he has no desire to be a gambler. [Paul believes that one of my responsibilities to the government military is to make him become homosexual, this story was a parable for my efforts to that end].

Paul explains in detail all that has happened to him "since the government military took over [his] life in 1985," then said how much he wished he had a "Deep Throat" to make the public aware of what has happened to him. Paul claims he had no idea the conspiracy was "so huge, [he] is talked about from coast to coast and from Canada to Mexico."

Reid spoke at length about how he has "overcome the American language;" how he can no longer be manipulated or influenced by anything anyone says including his lawyers, other inmates or the prison staff.

Reid laughed hysterically when he told a story about being in the car with his father, using the infantile words, “pee-pee” and “do-do.”

17. On April 7, 2005, Ms. Gleason and I visited with Mr. Reid at Brushy Mountain. Reid had recently sent letters to the Federal Court claiming, among other things, that I am a “prevaricator and both an atheist and agnostic;” Gleason and I had pre-determined that I would confront Paul to see his reaction; Ms. Gleason had prepared him in a phone conversation the day before by saying that I was upset about the letter. Usually, when Paul makes bizarre claims and statements he wants me to support, I may shake my head but do not correct him. On this day, I was not as friendly as usual; Paul made every effort to engage me but I refused to let him off the hook. Paul explained that he wasn’t angry with me because he knows I am controlled by the government military and “it’s not [my] fault.” I reminded him that in the past when he made such statements, he always qualified it with “it’s not my fault’ but he had not done so in this letter. Paul apologized then said I had just given him “one of the best gifts [he’s] ever gotten” then cited his method for purifying himself by getting it out when someone does something to anger or upset him; this method of self-purification is a “skill” Paul has worked diligently to acquire and it makes him happy to know I’ve learned from his process to better myself.

Reid had with him a list of “catch phrases” which he claims he first thought of and used in the past that are now showing up on TV and in print; he believes the government military recorded him then gave the phrases to others. Among them he cites the late Pope who, in his dying words, “said a direct quote” that Paul had written in a letter to a woman in 1986; “square off” is another of Paul’s original phrases that is turning up on TV; “conglomerate synergy” is a phrase he coined that he has now heard Martha Stewart use. Paul explained that scientific technology took his words and put them in the US papers because if the Pope could not speak three days before dying, how could he speak when he was dying?

18. Ms. Gleason and I drove to Brushy Mountain again on April 21, 2005 to see Reid; it remains impossible to discuss his case. He was more interested in discussing the government military and his hopelessness that he will ever be free of the scientific technology.

Paul has begun writing a document he variously calls a “deposition” with Gleason purportedly asking questions or his “internet letter,” not to be confused with his prior internet letter. He writes in long-hand and Rosalie types his notes as written.

Paul was upset with Gleason when he said several months ago that he no longer talked to “Americans” and Gleason asked what about Europeans? Her response made Paul angry and he was proud he could say, “Fuck you,” in response [which never happened]; he is proud he could call me a liar to my face and that he could call Nick Hare a “chicken-shit coward” and he “was impressed at how well we took it.” It’s a “beautiful skill” Kelly, Nick and I have acquired; having demonstrated our mastery of

words; words don't control us, we control words! Evidently, this "mastery" puts us on a par with Reid.

Today Reid was focused on his own intelligence; he claims to deal differently with us than his family, inmates or guards because "attorneys are educated;" he "speaks with veracity, clearly and directly," he wants to "shine" claiming this is his "component." He says he's not being an "opportunist;" he wants to be a leader, the one "who makes quotes." He continues on at length before looping back to the scientific technology and its effects on him.

Reid asked me to confirm conversations he avers took place during family visits with me in attendance, most of which are of a sexual nature and all of which were never said. When I won't go along with him, usually shaking my head no while saying I don't remember that being said, Paul gives me a "look" which clearly conveys his frustration at the control the military government has over me. He obsesses over his versions of events which contradict his family's recollections, testimony and court documents, most of which relate to his sexuality or behavior.

Paul said that if we're going "to take him on" [disagree with him] then we should be prepared because he's "going to be on the center stage of the world!" He is confident everyone believes him because he has "proved" he doesn't lie; Paul admits to being "verbose" and if you say something about him, he's "going to tell the world you're lying!" Paul believes he is above reproach; he has "substance behind [him]" and is demonstrating to us that he can "back it up."

19. On May 20, 2005, Gleason and I had our first contact visit with Reid at Brushy Mountain; since our grossly invasive body search before our last visit, we determined it could be no worse to meet with Paul in a contact situation.

During the opening dialogue, Reid was his usual charming self but with an edge that was unusual, only as the interview unfolded did it become clear to me that Paul's mental state had taken another serious downturn.

"Repeating" was at the forefront of his thinking, everything we talked about was a repeat; for example, when Paul's sister last visited, he believes he asked the unit manager if he could send out some papers with me and was refused, he now claims that was a "repeat" from the year before. Not only that, but Reid claimed he gave the same papers to Marjorie Bristol and me [at a time after Bristol left our office], which we gave to the warden who gave them back to us but Paul found in his cell some three weeks later. As he was explaining this to us, he became more and more confused as he tried to make sense of what he was saying, finally asserting that it was possible the scientific technology took the letters to the warden's office.

Reid noted how I was sitting with my right fist on my right cheek, claiming I did that another time and how would I know to do it again unless I was coached to do it by the government military scientific technology. He went on to say, "Common sense says

if you can repeat the exact actions, you have to be coached.” Reid believes that when we talk about him at our office or anywhere else, “they” listen to us just like they do his family and anyone else who comes into contact with him.

The remainder of the two hour visit was dedicated to the uniqueness of his situation, he has never heard of anyone taken over as he has been. He spoke at length about the scientific technology and recounted his personal history from the time “they” came into his life in 1985. He explained how, after he was released from prison in Texas, when he would go to a K-Mart or Target, the scientific technology would “take over the security cameras,” according to Paul, they expected him to shoplift; later he was told “through others” that if he had, the manager would have taken back whatever he took and let him go. He went on for some time recounting numerous efforts the government military had tried to trap him into breaking the law and his resistance to such efforts.

As the interview progressed, Reid became more intense and pressured, his face reddened. He talked about how, as he gets closer to death watch, the scientific technology steps up the intimidation by telling him he will go free, they “talk to him” about what he wants to spend his million dollars on, whatever he says he wants, they assure him he can have it. “They” tell him the real culprit will be caught and all his dreams will come true, he’ll live a good life in Houston.

Reid appeared to be making an effort to remain calm, stating all he really wants us to do is to “expose the scientific technology” but “they” tell him it will never happen; they are too powerful and have too much to lose for the world to know what they’re capable of doing.

Reid looked directly at Gleason and accused her of doing nothing to prove scientific technology exists, of not finding one document to present to the court; he then told her to go to hell, to hell with her feelings as she’s done nothing to help him, What about what I have endured for twenty-one years!”

Reid complained that the scientific technology was making his “mind foggy and fuzzy.” He denied death row inmate Tony Carruthers was being held at Brushy Mountain and was angry with Gleason for saying it, telling her never to mention it again.

Reid was becoming more and more difficult to follow and record, finally, pausing to regain his composure, Paul stated with pride that he has “reduced the scientific technology to a follower;” in the past they influenced him, he believed their lies that he would get out, they had the power and authority over him but now they can do nothing. The reason “they” can do nothing is because Reid does not believe anything from any outside influence, not Kelly, not me, not any other lawyer, not his family ... not anyone but himself.

Reid continued listing “repeats,” virtually everything he’s been told over the last several years; he got his stories and facts mixed up, he focused much of his frustration on me claiming that I have lied to him about everything, he can’t trust me, calling me a “snake in the grass.”

Reid said that he didn’t want to see Jim Simmons, his attorney for the Baskin-Robbins case because he failed to return several pages copied from *The Warrior’s Edge*.

When I asked Paul to sign new releases several weeks ago, he was not inclined but bargained he would if I would take out some papers; he signed two but the unit manager refused to allow me to have the papers. Kelly stepped in to explain why we need the releases; Paul responded that “all this means nothing!”

Reid was becoming agitated again, saying he was upset because we won’t be honest with him about the scientific technology; he claims his father [now deceased] told him the truth about seeing the videos and talking to the “scientific technology people.” With this “proof” he can’t understand why we won’t tell him that we have meetings with “them” and are coached what to say and do around him.

Paul said again that I first came to see him at Riverbend in 1998; he believes I was with Mike Engle and employed by Ron Lax’ company, Inquisitor, none of which is true. He said he likes me now but doesn’t believe me when I tell him we first met in May of 2003. He said he felt when we met he had a “new friend” and could feel trust developing but lost that feeling months ago when he realized I was coached. He was trying to decide whether to tell me his daughter’s name and send me to meet her, he wanted to see a picture of her but he realized just in time that I could not be trusted.

One more point in this lengthy description of this meeting with Reid, he said he will no longer talk to anyone – including Kelly and me – about his “past or present or TV.” Over the years I’ve visited Paul, he has alluded to the scientific technology sending him messages through the TV; he’s very clear that the TV doesn’t “talk” to him, but believes certain words and phrases are inserted into the scripts by the scientific technology for him and only he can recognize them.

20. On June 8, 2005, Ms Gleason and I again traveled to Brushy Mountain for our second contact visit with Reid. Today, he was more intense, his speech pressured and grew more so, his face, neck hands and arms were flushed; he paled and reddened throughout the interview.

Paul started in again to explain every detail of the government military’s surveillance of him since 1985; he stared directly and intently at each one when he addressed us. Again, he discussed at length the revelation of Watergate’s “Deep Throat,” and wished so much he could have a “Deep Throat” to expose the military’s plot against him but knows it will never happen. He believes they are more powerful than the president, citing the close calls of the Presidents Bush, the deaths of John Ritter, John

Kennedy, Jr., and his own father; additionally, there is the Oklahoma bombing and the Challenger explosion as proof of the lengths the government military is willing to go to make their point to Paul.

On this day, Reid said the scientific technology had been turned up after a brief reprieve before our last visit; while the orange taste in his mouth has been lessened, the ringing in his ears and the prickling of his body has been turned up and was nearly unbearable. He said it was particularly bad after our last phone conversation, after which, “they” run thoughts through his head to make him angry with us, most often for repeating word for word and movement for movement. “They” have begun telling him again that he will get out of prison but he thinks “they” want him to think that. They wake him up with the thought that he doesn’t want to die, all this to give him hope, to have him go forward with his appeals, to live so they can torture him for the rest of his life. He vowed not to be taken in again as he believes his execution is the only way he “can beat the government military at their own game.”

Reid went on about how he “can’t be manipulated again,” he recounted his recollection of Mark Olive’s “What if ...” statements in the courtroom, what if the scientific technology can be taken off, what if he receives his twenty-five million dollars, what if the real killer (s) are brought forward; to Reid’s thinking, to have asked these questions is proof Olive was informed by the military government that the scientific technology is real.

Reid averred again that the DNA paternity testing in 2005 had been done in 2003, vowing he “won’t be intimidated!” He believes his sister, Linda, was coached by the government military to “provoke” him into an argument on their last visit. [I was with them and witnessed Linda being very quiet and gentle with him as she tried to explain the tests were not a repeat].

Reid stated he believes Mark Olive “threw him a curve ball” causing him to change his mind and sign the petition claiming he was “not as knowledgeable nor as wise” as he is now. He believed Olive when he said the scientific technology could be taken off, he would collect his twenty-five million and he could live a “normal, natural life on a ranch in Texas.” Once Paul realized this could never [his emphasis] happen, he set about cutting himself off from any outside influence as he is absolutely convinced that everyone who comes in contact with him is controlled by the government military. Since that time and to this end, Paul has concentrated his efforts to “overcome the American language” and since then he has reduced “them to a follower.”

Scientific technology has “word power” over Reid from 1985 to 1990, he was “brainwashed” but now “no American word can manipulate [him].” Paul recited a long list of those controlled by the government military including Gleason and me but they no longer have control over him; Paul is proud of himself for “turning the tables” on scientific technology.

Gleason attempted to reason with Paul within the context of his delusion asking if that is true, then the scientific technology has convicted him of criminal acts he did not commit, therefore, if he goes forward with his execution, which is set by people he believes are being coached by “them,” then “they’ve” won. Paul claimed she had it all wrong, if he lives, the scientific technology people win, their motive is to keep him locked up for the next fifty-one years to torture him; going forward with his execution is a sign, he believes, that he is “smart” and “intelligent” to have figured it out and to use his execution against them.

Reid said “they” woke him up the other morning and “put a crying feeling on [him];” they want him to think he doesn’t want to die but he is “certain those are not my feelings.” He believes the scientific technology puts “those feelings” on his brain to confuse him. Gleason refused to support Reid’s contention that his decision reflects intelligence and her demeanor grew more serious; this seemed to have a visible effect on Paul as he appeared to want her approval. He then said he doesn’t care about the feelings of an attorney or an investigator.

Gleason expressed her concerns that Reid’s thinking could lead to self-destructive thoughts. He responded that the military government tried to get him to hang himself when he had never had a suicidal thought before. Gleason asked why Paul could not see the execution date as self-destruction and what the government military wanted for him. Paul denied her contention, believing instead that “they” don’t want him to go to death watch as “going to death watch shows they’re wrong!”

21. On June 22, 2005, Gleason and I again visited Reid at Brushy Mountain; he appeared slightly more relaxed than our last visit. We were surprised when he opened the conversation quoting Drs. Pam Auble and Xavier Amador as testifying in court that “a man is insane if he likes chocolate after the age of twenty-one.” At first, I looked for signs he was playing but he was very serious and begged to differ with the doctors as he likes chocolate and is not insane. My attempt to interject a little humor into the conversation did little to defuse Paul’s seriousness; he was adamant that both doctors had testified to it.

Paul spoke in broad terms about the world situation; he was eager to thank the US for bringing down Saddam Hussein. He did not see it for its effect on the world but from his personal view; since the military destroyed his life since 1985, Reid was delighted to know that the Muslim extremists “are going to see that the government military will reap what they sow.” He continued his “educational treatise” on the Middle East, seeming to dismiss any idea that Gleason or I have any knowledge of the situation.

Reid went on to explain that what he was telling us is what we’re not hearing on CNN, claiming God gave him the gift to “read between the lines,” intimating only he can do this. Reiterating that Drs. Auble and Amador told us that he is crazy, he said what they didn’t tell us was that he is very intelligent.

Paul told us again that he knows we are coached to repeat ourselves and told us to “go ahead” smugly expecting us to repeat, asking us again to “come forward and tell the truth.” I told him I was telling him the truth and the scientific technology has not coached me to repeat myself.

Paul’s frustration was hard to hide but, resigned to his belief that the scientific technology is so strong that either we don’t know it or we are coached to renounce its control over us, he changed the subject.

Reid addressed Gleason and said, “It’s happening right now,” putting his hands around his head like a helmet, he described his mind as “foggy” and feeling “divorced from reality,” he said he could taste the orange flavor in his mouth. He was becoming more agitated stating his execution was only one hundred and six days away and the scientific technology puts the orange taste in his mouth and “pops his anal [sic]” to let him know that he is at “the asshole end!” He reiterated everything the “evil, diabolical scientific technology” has done to him since 1985 through the Federal Court hearing.

Paul became more agitated the more Kelly tried to defuse the situation and switch him from the topic. Rather, he insisted on reading from his latest letter to Judge Campbell using his hands to express himself, vigorously pointing to what he had written and jabbing the air to make his points.

Reid claimed that in 1997, the scientific technology needed proof of Paul’s homosexuality so they went to his sister, Janet. He told a convoluted and far-reaching version of how this could be, integrating this with other events no one could have known save for the government military recording his every word and move then passing that information on to his sister, the attorneys and prosecutor Tom Thurman.

Fully engaged in his delusion, Reid claimed “they” have the guards leave out their shirt tails to send him a message, the inmates are coached to share their commissary with each other but not him, he points his index finger to his temple and refers to himself as “coo-coo.” He claims the scientific technology “knocked on thousands of doors” asking about him, “They had the whole city of Houston wondering who is Paul Reid!”

There was so much more said during this meeting regarding the government military and scientific technology and it’s effects that it is impossible to include here.

Gleason asked Reid about the Clarksville trial and why Paul didn’t tell about the scientific technology when he had the chance. Paul said he didn’t know how to talk about what was being done to him at that time as “only one thousand in all of America know about scientific technology;” he believes if he had talked then, he would have screwed it all up, so he kept his mouth shut.

In conclusion, over the three years I've visited with Paul Reid on a regular basis; engaged him in conversations, recorded his thoughts, feelings and words while witnessing his demeanor, expressions and body language, I have seen the deterioration of his mental state. The dates referenced in this affidavit barely scratch the surface of what Paul Reid has said, done and believes; there is not enough time or words to fully describe what he is experiencing.

Reid has never been able to discuss his case(s) in a meaningful way with his attorneys in my presence. From my lay perspective, he has descended completely into his delusion; he has no reference point he can trust or rely on, he has only himself in which to believe.

I have witnessed his family visits so know they love him and want the best for him; only to see Paul project his darkest feelings onto them, misquoting them and obsessing about perceived wrongs, lies and misunderstandings.

I have never lied to Paul, yet he sees me as having been brought into his life as a vehicle of the military government to lie to him. He becomes upset when I don't support his claims and recollections, further proof to him that I am controlled by the military government. It is impossible to reason with Paul, to offer any rebuttal to or proof of his mistaken ideations.

In the beginning, I could see the emotions and feelings of a real person behind his eyes, the one with whom I interacted; now replaced by a blankness that makes me question if he has any relationship at all with the world, with me, with anyone.

FURTHER AFFIANT SAITH NOT.

Attest: _____
CONNIE WESTFALL

Sworn to and subscribed before me on this the ____ day of May, 2006.

My Commission Expires: _____

NOTARY PUBLIC

State of California)
County of Contra Costa) ss
Costa)

AFFIDAVIT OF GEORGE W. WOODS, JR., M.D.

I, George W. Woods, Jr., M.D., after being sworn under oath, swear and affirm that the following is true and correct:

1. I am a licensed physician specializing in neuropsychiatry. I am in private clinical practice and also focus on forensic consultations. My business addresses are as follows:

2612 Lake Ferry Lane
Atlanta, Georgia 30339

1511-M Sycamore Avenue, #258
Hercules CA 94547

8716 Sand Point Way, Suite 10
Seattle, Washington 98115; and

139 Harmon Drive
San Antonio, Texas 78209

2. I am a Fellow of the American Psychiatric Association and a member of the Northern California Psychiatric Association. I am also a member of the American Academy of Psychiatry and the Law, The American Neuropsychiatric Association, and the American College of Forensic Psychiatrists. I am on the Board of Directors and Executive Committee of The International Academy of Law and Mental Health, where I serve on the Scientific Committee. I am also on the Advisory Board of the Health Law Institute, DePaul University College of Law.

3. I received my bachelor's degree from Westminster College in Salt Lake City, Utah, in 1969. I received my medical degree at the University of Utah in 1977 and

completed my residency at the Pacific Medical Center in San Francisco, California in 1981. I then participated in a National Institute of Mental Health/American Psychiatric Association (NIMH/APA) Fellowship in 1982. I received my board certification in psychiatry from the American Board of Psychiatry and Neurology in 1992. I became a diplomate in the American College of Forensic Examiners in 1998.

4. I joined the faculty of the University of California, Davis, Medical School, Department of Psychiatry, in 1996. For the next four years, I taught Forensic Psychiatry and Criminal Responsibility to psychiatrists in the Postgraduate Forensic Fellowship. I am current adjunct professor at Morehouse School of Medicine, Department of Psychiatry. I teach Clinical Aspects of Forensic Psychiatry. I am also an adjunct professor at California State University, Sacramento, in the Department of Educational Leadership and Public Policy.

5. I maintain a private clinical practice in neuropsychiatry, psychopharmacology, and psychotherapy. I have been qualified and have testified as an expert in numerous civil and criminal cases in State, including the State of Tennessee, as well as Federal Courts.

6. Counsel for Paul Dennis Reid, Jr., first contacted me in the fall of 2004 about conducting neurological and psychiatric evaluations of Mr. Reid and providing a report which synthesizes the findings of those evaluations. They also asked for my assistance in evaluating Mr. Reid's current competency to proceed in his Davidson County post-conviction case. My understanding is that the Davidson County judge initially denied the request, but later granted the *ex parte* motion for funds.

7. Eventually some funds were approved by the Administrative Office of the Courts and I was finally able to evaluate Mr. Reid on August 18, 2005 and October 6, 2005. By that time, the Davidson County post-conviction case was transferred to the Tennessee Supreme Court in an appeal.

8. Following my evaluations of Mr. Reid and review of multiple previous mental health records¹, I informed Mr. Reid's counsel that Mr. Reid suffers from a neurological disorder -- left temporal lobe dysfunction. The temporal lobe dysfunction has produced in Mr. Reid a chronic, schizophrenia-like psychosis which has severely impaired his ability to weigh, deliberate, inform and cooperate.

9. Counsel for Mr. Reid have requested an opinion from me as to whether Mr. Reid is presently competent utilizing two standards: 1) the *Rees v. Peyton*, 384 U.S. 312, 86 S.Ct. 1505, 16 L.Ed.2d 583 (1966) competency standard regarding waiver of appeals, and 2) the civil competency standard found in *State v. Nix*, 40 S.W.3d 459 (Tenn. 2001).

10. I have advised counsel that Mr. Reid is presently incompetent under the analysis required by any of those standards.

11. Mr. Reid's neuropsychiatric presentation reflects frank paranoia, manifested by a longstanding, relatively well-circumscribed delusion. A delusion is a false belief based on incorrect inference about external reality that is firmly sustained despite what almost everybody else believes and despite what constitutes incontrovertible and obvious proof or evidence to the contrary. Mr. Reid's delusion, that he has been

¹ These records include, for example (this list is not comprehensive), reports of Dr. Pam Auble, Dr. Daniel Martell, Dr. Helen Mayberg, Dr. Robert Kessler, Dr. Xavier Amador, Dr. Patricia Allen, testimony of these experts, neuroimaging reports, neuropsychological testing.

under the control of a government-directed surveillance and influence, impels, invades, and guides his daily activities as well as decision-making processes.

12. Mr. Reid's delusional beliefs substantially preclude him from making a rational choice among his legal options. *See, e.g., West v. Bell*, 242 F.3d 338, 341 (6th Cir. 2001) ("capacity to appreciate his position and make a rational choice with respect to continuing or abandoning further litigation or . . . suffer[s] from a mental disease, disorder, or defect which may substantially affect his capacity in the premises") (applying *Rees v. Peyton*). Mr. Reid currently has persecutory, paranoid delusions that "the military government" is using "scientific technology" to torture him. He sees execution as the only means of ending the torment due to failed promises in the past that the "scientific technology" will be "turned off." Thus, Reid is incompetent to decide whether to pursue a post-conviction petition on his own behalf or abandon that right.

13. Further, Mr. Reid currently is suffering from perceptual and memory impairments which render him unable to reliably relate events of his trial. His delusional beliefs that current counsel are members of the conspiracy against him preclude rational communication regarding his legal options and thus he is unable to effectively perceive and understand his legal right and liabilities in any meaningful sense.

14. Mr. Reid's beliefs that scientific technology is employed in a continuous basis upon his mind and person also interfere with his ability to manage his personal affairs. For example, he believes that scientific technology controls and "coaches" correctional officers, other inmates, and literally everyone with who he comes into contact. Reid reports that he limits his contact with others so as to not "act or react" to


the efforts of those other people to cause him to react consistent with their conspiracy against him.

15. Mr. Reid believes that the military government controls his ability to receive mail, receive gifts from others, and obtain items from the commissary. Further, he experiences certain events as "repeats," or Déjà vu experiences, which have occurred previously when they have not.

16. For the above reasons, I believe Mr. Reid to be presently incompetent under the standards enunciated in *Rees v. Peyton*, 384 U.S. 312, 86 S.Ct. 1505, 16 L.Ed.2d 583 (1966) and *State v. Nix*, 40 S.W.3d 459 (Tenn. 2001).

17. I would be willing to testify to the facts herein if provided sufficient funds to secure my presence in the Montgomery County Circuit Court.

FURTHER AFFIANT SAITH NOT.

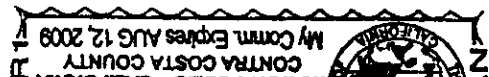
Attest: 
George W. Woods, Jr., MD

Sworn to and subscribed before me on this the 22nd day of May, 2005.

My Commission Expires: _____.

PLEASE SEE ATTACHED
CURRENT CALIFORNIA
NOTARY FORM

NOTARY PUBLIC



State of California

County of Contra Costa

Subscribed and sworn to (or affirmed) before me on this 22nd day of May, 2006, by George W. Woods Jr., personally known to me or proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature [Handwritten Signature]



OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: Affidavit of George N. Woods Jr. M.D.

Document Date: 5/22/06 Number of Pages: 5

Signer(s) Other Than Named Above: [Handwritten Signature]

Capacity(ies) Claimed by Signer

Signer's Name: _____

- Individual
- Corporate Officer — Title(s): _____
- Partner — Limited General
- Attorney-in-Fact
- Trustee
- Guardian or Conservator
- Other: _____

Signer Is Representing: _____

