

AFFIDAVIT

STATE OF TEXAS

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COUNTY OF TARRANT

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BEFORE ME, the undersigned Notary Public, on this 10th day of 04, 2003, personally appeared TONY GREGORY, who being sworn by me on his oath, deposed and said the following:

On July 22, 2002, I was introduced to a Barton Ray Gaines, a 19-year-old white male. By a Keith Bullis (TDC #0425621). We were all housed together in 62D in Tarrant County Correctional Center. It was not long, approximately 4 days later that I noticed and could not help from noticing comments, remarks and behavior Barton exhibited. He was constantly racked down (placed in his cell) for his conduct by the Tarrant County Correctional Guards, at the time, the two that was around him more than others was Officer Jackson and Officer Childs.

Officer Childs worked the 3p.m. to 11p.m. shift, and would refer to Barton not by his name, but as "Sesame Street", which is a child's program for small children. His conduct was out of control. There were no limits, so to speak, as the way he acted. From exposing himself, constantly to an old man that was housed in cell 17 (known as shaky). There were several threats, and even brutal for his behavior. There were times where Barton would lock others in there cells, stand on his sink in his cell to urinate, and walk in circles for long periods. I recall one incident where I was involved to prevent him from being attacked with a pen and a toilet brush (that had been made into a knife). This occurred when Barton placed his penis on another inmate's food tray. Freddy Gosher, I believe his name was. A record of most the incidents happening are recorded in the "officer's log" as well as the inmates. Several of us inmates as well as Officers believed Barton had some serious mental behavioral problems.

It was not until after December of 2002, that I was aware Barton was taking Paxil for depression. It was brought to my attention because of the commotion he made in the medication line. Barton later told me that he had read "bad things" in a book pertaining to the Paxil. He then explained to me he was trying to stop his intake of the drug "Paxil". The medical nurse refused, along with doctors, so Bart tried to reduce his own dose, by taking half, this is what caused the uproar in the medication line. A few days later, his medication was stopped towards the end of December of 2002. I did witness Barton withdrawal from the drug Paxil.

I cannot explain the pain, confusion, and sickness he felt. However, I did see and witness the vomit, sweats, tremors, and emotional torment he suffered and endured. Then January 9, 2003, he was transported to Texas Department of Corrections.

April 4, 2003, Barton was brought back to Tarrant County Jail, and placed back in 62D due to his appeal. I can honestly say I was shocked to see such a mental and behavioral change. He was no longer on Paxil. This is an extremely small view of the events that took place in my presence, in 62D.

Please do not hesitate to contact me if I can be of any further assistance.

Tony Lane Gregory

TONY LANE GREGORY, Affiant

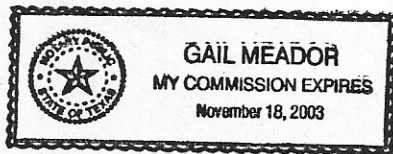
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Tarrant County Corrections

100 North Lamar Street

Fort Worth, Texas 76102

SWORN TO AND SUBSCRIBED BEFORE ME on this 10th day of OCT.,
2003, to which witness my hand and seal of office.



Gail Meador

Notary Public, State of Texas