Declaration of Eric Larsen

I, Eric Larsen, declare under penalty of perjury the following to be true to the best of my information and belief:

1. I am an attorney who is admitted to practice law in Arizona, and I have been practicing law since 1985. I am currently in private practice and have represented and currently represent capital defendants.

2. In 1987, I was a prosecutor with the Mohave County Attorney’s Office. I was assigned as the lead prosecutor in the case *State v. Daniel Wayne Cook*. Mr. Cook was charged with two counts of first-degree murder and faced the possibility of being sentenced to death. As lead and responsible counsel, it was my duty, and I had authority and responsibility, to make a decision whether to seek the death penalty for Mr. Cook. If I had decided it was not appropriate to do so, the death penalty would not have been sought.

3. Mr. Cook’s co-defendant confessed to killing one victim, and he was offered a plea of twenty years in prison in exchange for his testimony against Mr. Cook.

4. Attorney Claude Keller was initially appointed to represent Mr. Cook. Mr. Keller did not speak with me about mitigating circumstances in Mr. Cook’s case. Mr. Keller was at the low end of the competency scale for the handling of the defense of a standard felony. Mr. Keller appeared neither capable nor willing to put forth the effort necessary to represent a defendant charged with a capital offense.

5. Mr. Cook eventually represented himself at trial and at his sentencing. I observed Mr. Cook at trial, and he was clearly not competent to act as his own counsel.

6. I was recently contacted by one of Mr. Cook’s current attorneys at the Office of the Federal Public Defender, Robin Konrad. I was provided with information that I never knew before Mr. Cook’s trial. Specifically, I have reviewed:
   a. Declaration of Wanda Dunn dated April 8, 2010;
   b. Declaration of Debrah Howard dated November 15, 2010;
   c. Declaration of Howard Bennett dated March 27, 2009;
   d. Declaration of Donna Marie Schwartz-Watts, M.D., dated March 11, 2010;
   e. Declaration of Tora L. Brawley, Ph.D., dated March 12, 2010;
   f. Letter to Robin Konrad from Tora Brawley, Ph.D., dated September 30, 2010
7. Ms. Konrad informed me, and the documents I reviewed support, that Mr. Cook was physically and sexually abused as a child by family members and other caregivers. Mr. Cook's biological father abused him and burned him with cigarettes when he was an infant. Mr. Cook’s step-grandfather sexually abused Mr. Cook when he was a young boy. Mr. Cook was tied him up to a chair for punishment. Mr. Cook’s mother also sexually abused him as a child. Mr. Cook’s older step-brother sexually abused him as a child. Mr. Cook was placed in a group home when he was a teenager, where he was raped by several boys and by the counselor.

8. The records I have reviewed demonstrate that Mr. Cook suffers from organic brain damage and that he has been diagnosed with post-traumatic stress disorder. Evidence of his brain damage and post-traumatic stress disorder was present at the time that Mr. Cook was arrested and tried for murder.

9. Had I been informed of this mitigating information regarding Mr. Cook’s severely abusive and traumatic childhood and his mental illnesses, I would have not sought the death penalty in this case.

10. When I was a prosecutor, I believed that the death penalty should be reserved for offenders who were considered the worst of the worst. If I had learned about Mr. Cook’s background, it certainly would have explained his behavior. In fact, the childhood abuse he suffered mirrored the circumstances surrounding the crime. I would have, therefore, not been in favor of seeking a death sentence in his case.

Signed this __ day of November, 2010.

[Signature]

Name (Printed)

[Signature]

City, State
September 30, 2010

Robin C. Konrad
Federal Public Defender Office
850 West Adams Street
Suite 201
Phoenix, AZ 85007-2730

RE: Daniel Wayne Cook

Dear Ms. Konrad,

Per your request, I performed an extended clinical interview and neuropsychological evaluation on the above captioned patient on May 6, 2010. Below is a summary of my findings.

As you know, Mr. Cook is a 49-year-old, right handed male who is currently on death row at the Arizona Department of Corrections. He has an extensive history of neurological insults/events to include several head injuries, seizures, vascular headaches, attention deficit symptoms and serious substance abuse. Review of medical records reveals that he began use of alcohol at age 14 and recreational drugs at the age of 16. These included marijuana, barbiturates, hallucinogens and amphetamines and records note “drug overdoses.” There is also report of an incident where a car backed over his head and resulted in loss of consciousness for nine hours. There is report of a fractured jaw from a fight at the age of 24 and a blow to the forehead at age 12 which resulted in loss of consciousness. There was also a notation of “multiple blows from bar fights.” Records also note a history of seizures dating back to 1984 and treatment with Dilantin in 1986. A history of headaches was reported to have an onset at age 14.

Mr. Cook is currently reporting difficulty with cognition such as poor recall of recent events, decreased concentration, difficulty recalling familiar phone numbers and addresses and inability to recall some conversations when he is “not in a good place.” When asked to explain this Mr. Cook reported, “My brain gets too loud. It’s like my brain is in 4 pieces and they are arguing with each other and I’m just standing in the middle.” He states that this occurs most days and that to distract himself from this he will bang his head against the wall. He also states that he will sometimes stop eating on
purpose in hopes that the hunger pains will distract him. He reveals that he has lost 25-30 pounds in the last couple of months.

Mr. Cook is reporting vegetative symptoms including problems with sleep, not feeling rested, weight loss, low energy level, feelings of depression and anxiety, increased irritability and decreased frustration tolerance. He also reports a decrease in self esteem stating, "I like myself even less than I used to."

Mr. Cook was born in Chicago, IL. He reports a history of physical, sexual and emotional abuse which began in childhood. He states that he first began taking his mother's tranquilizers when he was age 11 or 12. He also began using alcohol at age 12.

He reports daily use of alcohol began at age 17 and reveals to have had several blackouts. He states use of marijuana began at age 13 and daily use began at age 15. He states beginning at age 16 he also abused amphetamine, barbiturates and intravenous crystal meth. He also reports a year period around age 15-16 where he was huffing lighter fluid 2-3 times per day on a daily basis.

Mr. Cook reports to have completed the 11th grade and subsequently obtained his GED. He states that he was in special education classes and was treated with Ritalin and Adderall for attention deficit. He has a poor work history stating that his longest employment was only for a couple of months setting up mobile homes. His last job was working at Bob's Big Boy.

At the time of this evaluation, behavioral observations revealed that Mr. Cook was dressed in prison attire, alert, and fully ambulatory. His mood was initially somewhat anxious but this improved as rapport was established. He was introduced to this examiner by his attorney which seemed to aid in decreasing his anxiety. He exhibited good eye contact, and hearing and vision appeared to be adequate for the purposes of this evaluation. His speech was fluent but he did exhibit repetitions and paraphasias (using the wrong word). There was also evidence of perseveration (giving the same response for different items). He was attentive to testing and exhibited good understanding of the tasks at hand. He was fully cooperative to testing and persisted with little encouragement. Testing conditions were optimal for the setting and these test results are considered to be a valid representation of Mr. Cook's current level of cognitive functioning.

Formal neuropsychological testing revealed Mr. Cook to have borderline verbal fluency for a category (9th percentile), below average fluency for letter cues (13th percentile), borderline nonverbal abstract reasoning on a category test (4th percentile for correct responses), and below average sequencing ability (16th percentile).

Verbal learning ability was below average (19th percentile) after repetition of five trials, below average for a short delayed recall (16th percentile) and borderline for a long delayed recall (7th percentile). On this test there were notable intrusions, perseveration and confabulation. For example, he would insert words in the list that had not been.
presented, repeat the same word several times in a short span and combine two words into one.

Copy of a visual complex figure was below average (10th percentile). Recall for this figure was borderline (7th percentile) after a 30 second delay and also borderline (9th percentile) after a 30 minute delay.

Trail Making Part A was borderline (9th percentile) and Part B was below average (22nd percentile).

Simple manual speed on a finger tapping test was severely impaired (1st percentile) on the right and borderline (7th percentile) on the left. Manual dexterity on a grooved pegboard was severely impaired (1st percentile) on the right and below average (10th percentile) on the left.

Assessment of effort on a forced choice test revealed no evidence of an attempt to exaggerate or feign cognitive difficulties.

In summary, Mr. Cook is exhibiting deficits in several areas of cognitive functioning. There is significant evidence of frontal lobe dysfunction and brain organicity.

Based on my review of the records I believe there was also significant evidence of frontal lobe dysfunction at the time of his evaluations in 1987 that occurred before his trial. On Dr. Wynkoop’s 10/23/87 psychological evaluation he did administer some cognitive screening tests, but these tests are by no means sufficient for determining comprehensive neuropsychological status. The tests used were not only insufficient, some of them would not have been considered up to date tests from a neuropsychological standpoint. In 1987 there were many contemporary and valid measures available to comprehensively assess neuropsychological status. These tests were not administered to Mr. Cook at that time.

Mr. Cook did receive a comprehensive neuropsychological test battery at the time of this evaluation.

Even with his limited testing, Dr. Wynkoop notes in his report, "The data suggests moderate liabilities in his ability to abstract or generalize, some deficits in understanding cause and effect relationships, lack of social judgment, difficulty in delaying response until all data was at hand, and some failure to understand the implications of behavior". These are all well-recognized indications of frontal lobe dysfunction but were not interpreted as such by Dr. Wynkoop.

Given these findings and Mr. Cook’s history of serious head trauma and other neurological insults, he should have been administered a full neuropsychological battery of tests to assess brain functioning in the areas of memory, attention, concentration, learning, visuospatial, language, motor and frontal lobe/executive functioning. This did not occur during the 1987 evaluation despite the availability of neuropsychological
measures at that time which could have formally assessed these functions. If Dr.
Wynkoop is not a qualified neuropsychologist, Mr. Cook should have been referred for
additional testing by a provider who does hold those qualifications.

Fully assessing those areas of functioning is critical as frontal lobe dysfunction combined
with the use of alcohol or drugs would have very likely rendered him more susceptible to
poor judgment and impulsivity and contributed to the circumstances surrounding his legal
charges.

These issues should have been fully assessed in prior evaluations and he should also have
undergone the neurological evaluation recommended by Dr. Almer in 1987.

Thank you for allowing me to participate in the evaluation of this patient. Please do not
hesitate to contact me should you have further questions.

Sincerely,

Tora Brawley, Ph.D.
Declaration of Donna Marie Schwartz-Watts, M.D.

I, Donna Marie Schwartz-Watts, M.D., declare under penalty of perjury:

1. I am a physician licensed to practice medicine.

2. I completed medical school in 1989, and graduated from the University of South Carolina School of Medicine.

3. I am presently employed as a Professor of Clinical Psychiatry and Director of Forensic Services at the University of South Carolina School of Medicine department of Neuropsychiatry.

4. I am Board Certified in General Psychiatry and have Added Qualifications in Forensic Psychiatry.

5. On January 5, 2010, I evaluated Daniel Cook at the Browning Unit of the Arizona Department of Corrections. My evaluation consisted of a five-hour interview and mental status examination. This was a non-contact interview conducted between a plexiglass window, which is consistent with the policies of the Arizona Department of Corrections.

6. Prior to his evaluation, I reviewed numerous legal and medical records of Mr. Cook including, but not limited to: Military records 1979-80; Report of Dr. Wynkoop dated November 3, 1987; Report of Dr. Eugene Aimer dated December 14, 1987; Report of Dr. B. Anthony Dvorak dated February 13, 1988; Wyoming State Hospital Records 1980-81; Idaho State Hospital records 1981-82; school records; Pre-sentence Investigation Report 1988 and Supplement; Declaration of Howard Smith Bennett dated March 27, 2009; and medical, mental health, and disciplinary records from the Arizona Department of Corrections including records from St. Mary's Hospital in 2000.

7. Based on my evaluation of and my review of his records, Mr. Cook has the following pertinent history:
a. He has a documented history of vascular headaches which respond to Midrin®. He describes his headaches as frequent and in the left fronto-parietal area of the brain. He describes associated nausea and scotoma. He reports that 60 Midrin® will last him approximately 6 months. The characterization of his headaches have changed since his prior evaluation by a neurologist, Dr. Dvorak in 1988. Dr. Dvorak recommended a CAT scan of his head which was never completed.

b. He reports outpatient treatment with Ritalin® for Attention Deficit type symptoms around age 16.

c. He has a history of extensive use of substances which can adversely affect cognition, including: alcohol, cannabis, psilocybin, barbiturates, and methamphetamine.

d. He has a childhood history of sexual abuse and numerous suicide attempts in early adulthood.

e. He reports a history of closed head injuries. He reports being run over by a vehicle in the head. He also reported being on Dilantin® after this injury.

8. During his mental status examination, Mr. Cook had difficulty abstracting similarities between objects and he reports long-term memory deficits.

9. It is my opinion to a reasonable degree of medical certainty that Mr. Cook -- who has a history of inattentiveness as a teenager, severe substance abuse, a closed head injury, problems with memory, vascular headaches and difficulty with frontal lobe function -- suffers from symptoms that alone or in combination can be consistent with organicity and brain damage.

10. It is my opinion to a reasonable degree of medical certainty that the psychological testing completed in 1987 was incomplete and there are more sensitive neuropsychological testing available which would better assess his cognitive functions than those used in 1988. The testing he had was incomplete.
11. It is my opinion that he requires a complete neuropsychological evaluation to determine his present cognitive functioning.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11th day of March, 2010, in the State of South Carolina.

[Signature]
Donna Marie Schwartz-Watts, M.D.

SWORN TO AND SUBSCRIBED BEFORE ME,
THIS 11th DAY OF MARCH, 2010.

[Signature]
Notary Public for South Carolina
My Commission Expires July 5, 2015

MY COMMISSION EXPIRES
Declaration of Tora L. Brawley, Ph.D.

I, Tora Brawley, Ph.D., declare under penalty of perjury:

1. I obtained a Bachelor’s degree from the University of Texas in 1986. I obtained a Master’s degree in 1988 and then a Ph.D. in Clinical Psychology with an emphasis in neuropsychology in 1992 from the California School of Professional Psychology. I completed a pre-doctoral clinical internship at Baylor College of Medicine in Houston, Texas, and a post-doctoral fellowship in clinical neuropsychology at Duke University Medical Center in Durham, North Carolina.

2. I am a licensed clinical psychologist in South Carolina, but have the additional training in neuropsychology, which is the study of brain behavior relationships. I am currently an Assistant Professor with the University of South Carolina School of Medicine, Department of Neuropsychiatry and Behavioral Services. I currently perform comprehensive neuropsychological evaluations in both criminal and civil matters. I am also a designated neuropsychologist for the Federal Aviation Administration. From 1999 to 2002, I was employed by the South Carolina Department of Mental Health at William S. Hall Psychiatric Institute in Columbia, South Carolina. During that time, I conducted court-appointed evaluations to determine competence to stand trial and capacity at the time of the offenses in approximately 300 cases, including approximately 100 capital and non-capital murder cases. I also performed all of the neuropsychological evaluations required by the forensic unit during that time period.

3. I was retained to review documents pertaining to prior evaluations of Daniel Cook, specifically those produced by Dr. Almer, Dr. Dvorak and Dr. Wynkoop.

4. These records document the history of a serious closed head injury, seizures, drug and alcohol abuse, and several other less serious blows to the head. Both Dr. Almer and Dr. Dvorak recommended further neurological evaluation due to this history.

5. On October 23, 1987 Daniel Wynkoop, Ed.D performed a psychological evaluation on Mr. Cook for the purposes of determining competency to stand trial. While Dr. Wynkoop did administer some cognitive screening tests, these tests are by no means sufficient for determining comprehensive neuropsychological status. Given Mr. Cook’s history of serious head trauma, he should have been administered a full neuropsychological battery of tests to assess brain functioning in the areas of memory, attention, concentration, learning, visuospatial, language, motor and executive functioning. This did not occur during the 1987 evaluation. For example, he was not administered the Wechsler Memory Scale-Revised which would have been the ideal test in 1987 to assess verbal and visual memory, verbal memory, working memory, learning and concentration. Likewise, he was not administered any tests to formally assess frontal/executive functioning which is often impaired following head trauma and can cause impulsivity and poor judgment.
6. There are multiple indications in the records reviewed of signs and symptoms of brain dysfunction/damage.

7. Based on my review of the provided records, it is my opinion that Mr. Cook should have a comprehensive neuropsychological evaluation to fully assess for brain organicity and current cognitive functioning.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 12th day of March, 2010, in the State of South Carolina.

[Signature]

Tora L. Brawley, Ph.D.
CURRICULUM VITAE

TORA L. BRAWLEY

University of South Carolina School of Medicine
Department of Neuropsychiatry and Behavioral Science
3555 Harden St. Extension, Suite 301
Columbia, SC 29203
(803) 434-4229
(803) 434-4351 FAX

EDUCATION:

1986 BA The University of Texas, Austin, Texas
Major: Pre Med/Psychology Minor: Sociology

1988 MA California School of Professional Psychology
Major: Clinical Psychology Proficiency: Neuropsychology
(Full APA Accreditation)

1992 PhD California School of Professional Psychology
Major: Clinical Psychology Proficiency: Neuropsychology
(Full APA Accreditation)

INTERNERSHIP
Baylor College of Medicine, Department of Psychiatry
Houston, Texas (Full APA Accreditation)

POSTDOCTORAL FELLOWSHIP
Duke University Medical Center, Department of Psychiatry/Medical Psychology
Durham, North Carolina

ACADEMIC HONORS:

1985-1986 Dean's List, University of Texas at Austin
1986-1990 Dean's List, California School of Professional Psychology

LICENSES:

1999-Current Licensed Clinical Psychologist
State of South Carolina (License Number 752)

1997-2000 Licensed Clinical Psychologist and Certified Health Services Provider
State of North Carolina (License Number PP2327)

1993-Current Certified and Licensed Clinical Psychologist
State of Texas (License Number 24914 - Inactive)
PROFESSIONAL EXPERIENCE:

CURRENT  
Assistant Professor  
South Carolina School of Medicine, Department of Neuropsychiatry and Behavioral Science, Columbia, South Carolina

1999-2002  
Clinical Psychologist - Forensic Neuropsychology  
William S. Hall Psychiatric Institute - Forensic Unit, South Carolina Department of Mental Health, Columbia, South Carolina

1999-2002  
Faculty for Technical Trial Advocacy Course  
National College of District Attorneys, Columbia, South Carolina

1999  
Neuropsychological Consultant  
National Hockey League, Carolina Hurricanes, Raleigh, North Carolina

1998-1999  
Clinical Neuropsychologist  
WakeMed Hospital, Rehabilitation Unit, Department of Neuropsychology, Raleigh, North Carolina

1997-1998  
Post-Doctoral Fellow/Clinical Associate  
Duke University Medical Center, Department of Psychiatry/Medical Psychology, Durham, North Carolina

1992-1997  
Assistant Professor  
Baylor College of Medicine, Department of Neurology, Texas Medical Center, Houston, Texas.

1995-1997  
Co-Director  
Baylor Post-Concussion Neurobehavioral Clinic, Baylor College of Medicine, Department of Neurology, Houston, Texas.

1990-1992  
Research Associate  
Baylor College of Medicine, Department of Neurology, Houston, Texas.

1989-1990  
Psychology Intern  
Baylor College of Medicine Outpatient Psychiatric Clinic, Houston, TX. Supervisor: Michael Cox, Ph.D., Director of Training.

1989-1990  
Psychology Intern  
Ben Taub General Hospital Emergency Room, Psychiatric Unit and Consultation and Liaison Service, Houston, Texas.

1989-1990  
Psychology Intern  
Depelchin Children's Home, Cullen Bayou Place Outpatient Clinic, Houston, TX

1989-1990  
Psychology Intern  
Transitional Learning Center Head Injury Rehabilitation, Galveston, Texas.
PROFESSIONAL EXPERIENCE (CONT.)

1988-1989  Psychological Trainee
Fresno Community Hospital, Rehabilitation Psychology Department,
Fresno, California.

1988  Intake Counselor
Baylor College of Medicine, Sex Offender Treatment Program, Department of
Psychology, Houston, Texas.

1987-1989  Neuropsychological Assistant
Baylor College of Medicine, Dept. of Neurology, Houston, Texas.

1987-1988  Psychological Trainee
United States Air Force Mental Health Clinic, Castle Air Force Base, Atwater,
California.

1987  Psychological Trainee
Bullard High School, Scandinavian Jr. High and Jackson Elementary Schools,
Fresno, California.

1986  Psychological Technician
Medical Personnel Pool, Houston, Texas.
Placement: Harris County Psychiatric Hospital

1985  Mental Health Worker
Deer Park Psychiatric Hospital, Deer Park, Texas.

1985  Mental Health Worker
Austin State Hospital, Travis Unit, Austin, Texas.

1984  Volunteer Services
Texas Children's Hospital, Houston, Texas.

1984  Mental Health Worker
Extend-A-Care Program, Autistic Unit, Austin, Texas.

RESEARCH EXPERIENCE:

1987  Research Assistant
California School of Professional Psychology, Fresno, California.

1984  Research Assistant
Biopsychology Laboratory, University of Texas, Austin, Texas.

PROFESSIONAL AFFILIATIONS:

National Academy of Neuropsychology
COMMUNITY CONSULTATION EXPERIENCE:

1990-1997 Counselor, Muscular Dystrophy Association ALS Clinic, Houston, Texas.


1989-1990 Psychology Intern, placed in Mid City Community Mental Health Center, Houston, Texas.

1988 Alzheimer's Disease Association family support group, Fresno, California.

PUBLICATIONS AND INVITED LECTURES:


Brawley, T.L. (2003, January). Neuropsychological Assessment: Basic Overview for Psychiatrists. Presented to General Psychiatry Residency Program, University of South Carolina School of Medicine, Columbia, South Carolina.


PUBLICATIONS AND INVITED LECTURES (CONT.):


REFERENCES: Available Upon Request
Declaration of Wanda Dunn

I, Wanda Dunn, declare under penalty of perjury the following to be true to the best of my information and belief:

1. My name is Wanda Dunn. I am the mother of Daniel Wayne Cook.

2. I was born on May 16, 1942, in Gibson, Tennessee. I am the only child of Charles and Mattie Mae Meadows. My mother Mattie Mae was known as Mae. I never liked or got along with Mae. I know nothing about my father. When I was a young child, my parents divorced, and Mae, my grandmother, and I moved to Chicago, Illinois.

3. While in Chicago, Mae married a horrible man named James Hodges. James was previously married and had two children, Douglas and Debbie. James was unfaithful and terribly beat Mae. I often witnessed the abuse and called the cops several times but nothing ever happened. Back then, the cops never did anything about domestic violence.

4. When I was seventeen years old, I met Gordon Cook, who lived in the same building as me. He was five years older than me and had served in the military. Gordon was an alcoholic and abused drugs. Gordon was my way out of my home. I dropped out of school, married Gordon, and immediately became pregnant but later miscarried. I became pregnant again, and on August 11, 1960, I gave birth to our daughter Debrah Jean Cook. After Debrah was born, Gordon was never the same again and became mean and physically abusive. I believe he was angry we had a child.

5. A few months later I became pregnant with Daniel. It was not a planned pregnancy. I knew I was pregnant within a couple of weeks because I drank a glass of orange juice and vomited, which happened with each pregnancy. I experienced morning sickness and hated being pregnant.

6. While I was pregnant with Daniel, Gordon and I had no money to buy food. I also smoked cigarettes daily and drank beer a few times while pregnant. Gordon beat me, hit me in my stomach, and pushed me down, causing me to land on my stomach. Not once did I see a doctor while pregnant with Daniel.

7. Gordon did absolutely nothing to help. He sat on his butt and drank alcohol all day. Everyday while pregnant, I walked four to five miles carrying our daughter Debrah on my stomach to the babysitter and then went to work. At the end of the work day, I did it all over again and walked four to five miles with Debrah on my stomach all the way back home. Even the day Daniel was born, I carried our daughter Debrah on my stomach the entire ten-mile walk to Cook County Hospital.

Initials [Signature]

ER 000114
8. On July 23, 1961, our son Daniel Wayne Cook was born three-months premature, weighing three pounds and two ounces. My labor lasted from approximately 4:00 p.m. to 11:00 p.m. Forceps were used in the delivery and left indentation marks on Daniel’s head. A doctor instructed us to take Daniel to a doctor one week after his birth but Gordon refused. The indentation marks on Daniel’s head remained for approximately three months.

9. I could tell Gordon was not mentally right by the way he treated our children. He often beat Daniel, Debrah, and me. I called the police several times and our neighbors knew about the abuse but nothing was ever done. Gordon beat Daniel and Debrah with a belt and burned them with cigarettes. I believe Gordon sexually abused our children. I saw a cigarette burn on Daniel’s penis; Daniel was only five months old.

10. At one point, Gordon, Daniel, Debrah, and I were homeless and lived in a park for six months. I did not want to ask for help from Mae and her husband James, but I needed a home for my children. I eventually gave in and moved into my mother’s home with Daniel and Debrah. While living with Mae and James, Mae would not let me see my children and often tied them to chairs. Mae took my children from me because James wanted to sexually abuse Daniel and Debrah. James frequently sexually abused Daniel and Debrah and forced Daniel and Debrah to have sexual intercourse with each other on several occasions. Debrah told me James raped her every two to three nights. I believe James also sexually abused his own children, Debbie and Douglas. I recall James visited his daughter Debbie, and when Debbie saw James, she fell to the floor and shook.

12. After getting on my feet, I left Gordon and told him that he could no longer see his children. I remember I hit Gordon in the head with a glass Coke bottle the day I ended our relationship. After I left him, Gordon stalked me. One night, Gordon showed up at my home and tapped on a window, and I pulled a gun on him and he left. On another occasion, Gordon was high on drugs and entered a restaurant where I worked, and I threw a hot pot of coffee at him but missed. I never saw him again. Gordon’s own family was afraid of him. He beat up his mother and sister.

13. After leaving Gordon, I met John Dunn while working as a waitress at his restaurant. John was twenty-three years older than me and in the military. We started a relationship. I told John that I would kill him if he ever laid a hand on me - I meant every word. On August 11, 1966, John and I married. I was John’s fifth wife, and he had seven children before he married me. After we married, John and I eventually moved our family to California. John was a good father and gave our children money for completing chores. John treated Daniel and Debrah differently from his own children; he physically abused Daniel and yelled at Daniel and Debrah.

13. There were a lot of things physically and mentally wrong with Daniel. He had poor development all the way around, such as trouble walking and was not potty-trained until age five. At age seven or eight, Daniel was diagnosed with a mental illness; I cannot recall the

Initials /\
type of illness. When he was fourteen years old, Daniel was diagnosed with bipolar disorder. He was also tested and diagnosed with a learning disability.

14. When Daniel was fifteen years old, we placed Daniel in a group home. I do not remember the exact reason; I just know I could not handle him. Daniel remained in foster care for the rest of his childhood. I did not see him frequently. Daniel told me he was raped by several boys and a counselor in the McKinley School for Boys in San Dimas, California.

15. Daniel and I did not have much of a mother-son relationship. When Daniel was arrested and charged with first-degree murder, I did not attend Daniel’s trial. I have not maintained any contact with Daniel since his incarceration.

16. My daughter Debrah and I do not have a relationship. Debrah is mentally ill and received an IQ score of sixty in the past. Debrah has always taken from me. She took everything I owned while I was in hospice care approximately seven years ago. After my health improved, Debrah called a doctor and had me committed in a psychiatric ward for three weeks in Phoenix, Arizona. I believe Debrah is angry with me because of the sexual abuse she endured from James Hodges.

17. In 1981, I was diagnosed with bipolar disorder and anxiety. From 1981 to 1991, I received psychiatric prescription medication. In 1982, I attended a twenty-eight-day inpatient alcohol rehabilitation program after drinking about a twelve-pack of beer daily for approximately three and one-half years. I believe I turned to alcohol because I was lonely. I have not consumed alcohol since my participation in the alcohol rehabilitation program.

18. I am currently living in an assisted-care residence in Glendale, Arizona. I consider Daniel a good person. I do not believe Daniel should be executed.

Signed this ___ day of ___, 2010.

Wanda Dunn
Name (Printed)

City, State
Glendale A2

Witnessed by:
Sandra Zabinski
Name (Printed)

Page ___ of ___

ER 000116
Declaration of Debrah Howard

I, Debrah Howard, declare under penalty of perjury the following to be true to the best of my information and belief:

1. My name is Debrah Howard. I am the sister of Daniel "Danny" Cook. Danny is my only brother; he is about eleven months younger than me.

2. Our mother is Wanda Jean Meadows. I call her Wicked Wanda. Wanda is a very strong, tight-lipped woman. She hates overweight people and she is racist. According to Wanda, everything she does is perfect and no one is better than her or her equal; it is her way or no way.

3. As a mother, Wanda was absent, abusive, and inattentive to Danny and me. Wanda would beat me and Danny. Even though she treated us poorly, we still craved her love more than anything. She never gave it to us.

4. Wanda was very competitive with me. If I lost ten pounds, she would lose twenty. When I received a job offer, she told me I got the job because she drove me to the interview.

5. Wanda is mentally ill and a prescription pill junkie. When Danny and I were growing up, Wanda attempted suicide several times. I have visited Wanda in mental wards and seen her in bed with bandages around her wrists. I have seen paperwork indicating Wanda has bipolar disorder and borderline schizophrenia diagnoses.

6. Wanda met our father, Gordon Cook, in Chicago, Illinois. Gordon was a violent man. When we were young children, Wanda left Gordon and turned to her mother, Mattie Mae Hodges, and stepfather, James "Jim" Hodges, for help. Danny and I moved in with Jim and Mae and were left in their care. We were only a few years old when we went to live with our grandmother and step-grandfather.

7. Jim and Mae drank a lot of alcohol and neglected me and Danny. Jim and Mae dragged me and Danny in and out of taverns. Jim and Mae did not feed us properly; we would get lemon meringue pie for dinner. The first decent meal

Initials DH
we received was cottage cheese and fruit. Danny did not like it and threw up. He was then forced to eat his vomit off the ground.

8. Jim sexually abused me on a regular basis. The sexual acts included oral and penetration. For a long time I felt that was the way Jim showed he loved me. When I asked Wanda why she left us with the same man who physically and sexually abused her, she got mad and swallowed some pills. Jim was also physically abusive. Mae tried to discipline us by beating us before Jim got to us but it never made a difference. After Mae died, Danny and I were sent to live with our mother and her new family.

9. Wanda had worked as a waitress at Yankee Burger restaurant in Chicago and started a relationship with the owner, John Dunn. Wanda married John on my sixth birthday. John was significantly older than Wanda. He grew up during the Great Depression and served in the military. John had four former wives and several children from other marriages. After Wanda and John married, Danny and I had to deal with the blending of two families and John becoming the disciplinarian. Our blended family included John’s children: Robert, Kenny, Kathy, and Frankie. After Wanda and John married, our family moved from Chicago, Illinois, to Sepulveda, California, which is now North Hills, California.

10. John was very controlling. He always wanted Wanda’s attention directed at him and his children and not Danny and me—it was always the Cooks against the Dunns. John did not want Danny and me. All Danny and I wanted was Wanda’s love and attention.

11. Wanda’s suicide attempts were the dark secret in the family. At least once a year, I came home to an ambulance. Every time Wanda attempted suicide, John told Danny and me it was our fault. John was embarrassed by Wanda’s suicide attempts and moved us around California and Arizona. We lived in Prescott, Arizona, the longest because it offered isolation and secrecy. Wanda’s last suicide attempt that I know about was in 1980.

12. John forced us to attend family counseling, but Danny and I never said anything because he took over the sessions. Danny and I were terrified of John. On Saturday mornings, we did not watch cartoons or play outside like

Initials DH
other children. If John ordered us to clean our rooms and found a hairpin on a doily, he trashed the room.

13. John was vicious with a belt. The Dunn kids bent over and took it, but Danny and I fought to the point John and Wanda forced us to lie over the bathtub so they could beat us. When Danny got beat, he hung on to the belt for dear life and flew back and forth in the air.

14. Danny held everything in and did not cry much. He let the cats rip his hands and arms to shreds and watched the blood flow from the cuts. Danny had dramatic mood swings. He was diagnosed with bipolar disorder around 1969 and often went to the doctor to have his brain waves and patterns checked.

15. Danny was always skinny and sick from asthma. He frequently wet his bed and was beaten for it. He could not sit still and was fidgety. Danny suffered from social anxiety which prevented him from having any close friends. I was Danny’s closest friend, and he was mine.

16. Danny and I have a half-brother George, who is John and Wanda’s only child. George has been a junkie since he was about eleven years old. He does not talk about the past because it is too painful. George saw and experienced a lot. Wanda beat George with a frying pan, and George witnessed Wanda’s suicide attempts.

17. People in my family are reluctant to talk about the problems that occurred within our family. Half of the family hates Wanda and the other half hates John. My stepsister Kathy Dunn is the angriest at Wanda and blames her for what occurred in the home. Sexual abuse was a problem in the home. Kathy and I were molested by our brothers Frankie and Kenny. With the prevalence of sexual abuse in the family and home, it was confusing. As children, Danny and I crossed sexual boundaries.

18. When I was about sixteen years old, I returned home from school and Danny was gone. Wanda and John had sent Danny to a boys home in San Dimas, California. I was upset and asked a couple I babysat for, Mark and Betsy Fowler, if I could stay with them. While living with the Fowlers, they took me to visit Danny in the boys home. Danny was sad and never told me what

Initials DH
happened in the boys home. After one month with the Fowlers, I returned home to Wanda and John. A couple of years later, I moved out of Wanda and John’s house for good after John beat me one last time. I lost contact with Danny around this time.

19. The first time I saw Danny again was when I was around 21 years old. He and his girlfriend showed up on my doorstep in Lake Havasu, Arizona, after leaving a drug rehabilitation center in Idaho.

20. While I was living in Lake Havasu, Danny went manic one night and kept telling me he loved me and wanted me to say it back every time. He grabbed me and told me over and over he loved me. I told him to calm down, and he became more upset. I asked Danny to leave and come back in a couple of days. He left, and Danny was arrested for murder several days later.

21. I feel guilty not being there for Danny. I should have been at his court hearings, but Wanda forbid me. The craving we had as kids for Wanda’s attention lasted a long time. I let Wanda control me until I was thirty years old. The last straw was when Wanda hit my son Ryan with a belt and ripped his shoulder open.

22. I have spent many years in extensive therapy working on dealing with the sexual and physical abuse I suffered, and I have mentally repressed a lot of the memories. In the past, I coped with the abuse I suffered and witnessed as child by abusing alcohol. I am a recovering alcoholic and attend Alcoholics Anonymous meetings.

23. I love my brother and do not want him to be executed.

24. No one from Danny’s prior defense teams had ever contacted me. If someone had contacted me, I would have provided them with all of this information that I have provided in this declaration today. I have provided this information of my own free will.

I declare under penalty of perjury that the foregoing is true to the best of my information and belief.

Initials

ER 000121
Signed this 15th day of Nov., 2010.

Debrah J. Howard
Name (Printed)

City, State

Witnessed by:

Sara J. Zavala
Name (Printed)

ER 000122
DECLARATION OF JAMES STONE

I, James Stone, declare the following to be true to my best information and belief:

1. My name is James Stone. I am the older half-brother of Gordon Cook. Our mother was Eva Conn.

2. I left home at the age of 17 to join the United States Air Force, where I served for 24 years.

3. My contact with my half-brother Gordon over his life was sporadic. Gordon wanted to be on his own.

4. Gordon was considered the black sheep of our family. He was a con-man. Once, Gordon was arrested in Chicago and used my name as an alias.

5. Gordon lived a wicked life. He was no good to anyone.

6. Our sister, Linda, who was the opposite of Gordon, took care of him throughout his life. Linda and Gordon have both passed away.

7. Gordon was kicked out of the Navy and/or the Army.

8. I know that Gordon had many children, but I do not know who they are or where they live. I also do not know the mothers of any of Gordon's children.

9. I was contacted by an investigator with the Federal Public Defender’s Office about Gordon’s son, Dan Cook. I have never met Dan.

10. I was told by the investigator that Gordon abused Dan as a child. Gordon was a mean guy, and I was not surprised that he would abuse his child.

11. I am giving this declaration by my own free will.

Signed this 10th day of March, 2011.

James Stone
Declaration of Kathy Lynn Dunn

I, Kathy Lynn Dunn, declare under penalty of perjury the following to be true to the best of my information and belief:

1. My name is Kathy Dunn. Daniel "Dan" Wayne Cook is my stepbrother. His mother Wanda married my father John Dunn.

2. I am about one year older than Dan. I lived with Dan after my father married Wanda. I have four brothers, three half siblings, and two stepsiblings.

3. Dan was dealt a rotten hand in life. He survived and did the best he could. He never had any structure or opportunities given to him.

4. Dan's mother Wanda is a screwed up lady. She is a predator and sex abuser. She suffers from manic depression.

5. Wanda severely sexually abused one of my brothers. I told my father about the sexual abuse, and he accused me of lying and said Wanda did not like sex. My father completely stood by Wanda.

6. My father was a military man. He was judgmental, controlling, and emotionally abusive. He disciplined us by beating us. My father used what he called "The Board of Education" when beating us. He would make us grab our ankles, announce the number of whippings we were about to receive, and hit our bare butt with the board.

7. My father went from a successful business man owning real estate to a piss poor place in his life after marrying Wanda. Wanda drained my father of every ounce of money he had. My father in his eighties was miserable and frequently called me in tears about how Wanda was spending all of his money. He received $3,200 in monthly retirement and Social Security, and Wanda spent it all.

8. I was contacted in 2010 by an investigator with the Federal Public Defender Office. Before that time, no one from Dan's prior defense teams had ever contacted me. If someone had contacted me, I would have provided them...
with all of this information that I have provided in this declaration today. I have provided this information of my own free will.

Signed this 14th day of February, 2011.

KATHY DUNN
Name (Printed)

Bartlett, ILLINOIS
City, State
Declaration of Cynthia Kline

I, Cynthia Lynn Kline, declare under penalty of perjury the following to be true to the best of my information and belief:

1. My name is Cynthia Kline. I am a licensed Marriage and Family Therapist in California.

2. I know Daniel "Dari" Wayne Cook. I was Dan's social worker when he was a teenager living in a boys group home operated by Westside Youth Group Homes in Lancaster, California, in the late 1970s.

3. What stood out about Dan was his emotionality. Dan had disproportionate responses. Once when Dan was upset, I tried to talk him down and put my hand on his hand. Dan pulled his hand away, grabbed his thumb, and broke it.

4. Dan was often depressed and his mood fluctuated. Dan seemed to exaggerate things and it was difficult to reason with Dan when he was upset. Dan was really upset about his placement in a group home.

5. I never learned the true situation of Dan's home life because Dan fiercely protected his family. Dan disliked his stepfather. His mother was mentally unstable and unavailable to Dan as well as his group home staff. When Dan had a home visit, he returned to the group home very upset because the visit did not go well. Dan had no emotional support except from his group home staff.

6. As a society, the system is supposed to protect children but is not always successful. In California in the 1970s, when a child was taken out of the home, it was the job of the placement group home to rehabilitate the child to become a productive member in society. If a child had difficulties, the child was moved to another group home, as was the case with Dan.

7. The California child welfare system failed Dan by not providing him the spectrum of services he needed. His care consisted of his house parents, usually a married couple who cared for six to ten children at once; a visit with a social worker once weekly; and public schooling. Dan received minimal

Initials _CK_
services to receive the help he needed. Dan needed a higher level of care and went about his adolescence acting out his loss, anger, and grief, and he took these feelings with him from group home to group home.

8. I do not believe Dan should be executed. The crime is inexcusable and Dan has been paying for his crime and should remain in prison, but we and the system bear responsibility as well.

9. I was contacted in 2010 by an investigator with the Federal Public Defender Office. Before that time, no one from Dan’s prior defense teams had ever contacted me. If someone had contacted me, I would have provided them with all of this information that I have provided in this declaration today. I have provided this information of my own free will.

Signed this 11th day of March, 2011.

Cynthia Lynn Kline
Name (Printed)

Lancaster, CA 93536
City, State

Cynthia L. Kline
Signature

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Initials CK

ER 000130
Declaration of Thomas Monroe Maas

I, Thomas Monroe Maas, declare under penalty of perjury the following to be true to the best of my information and belief:

1. My name is Thomas Maas. I am a licensed Marriage and Family Therapist in Idaho. I have been a foster and group home parent for over 30 years and have fostered more than 50 children.

2. Over the last 25 years, I have worked as a therapist in California and Idaho and provided expert testimony in legal proceedings. My experience includes working as the Treatment Representative in the drug and mental health courts in Salmon, Idaho, and Director of Youth Family Renewal Center in Rexburg, Idaho. I started a program called the Gustafson House in Idaho Falls, Idaho, which is a group foster home for children who could not be maintained in a foster home, usually due to mental illness. Currently, I am the Clinical Director and part-owner of Salmon Mental Health Clinic, a small private clinic providing outpatient assessments and counseling with a primary focus on substance abuse, mental health, and marriage and family.

3. I know Daniel “Dan” Wayne Cook. I was one of Dan’s group home parents in Lancaster, California. From about 1977 to 1984, my wife Lisa and I worked for Westside Youth Group Homes as group home parents in Lancaster, California. Dan was one of six boys in our group home in the late 1970s. He lived with us for about two years.

4. Dan was one of my top kids. He was loving, caring, and kind. Dan did very well in the structured environment of the group home. If I asked him to do a chore, he did it.

5. Dan had a dry sense of humor and was mellow. He loved nature and photography. While in my care, Dan stayed out of trouble. Dan did not have violent tendencies toward others; he only hurt himself.

6. Dan was withdrawn and never talked about his family or past experiences. I, however, suspected that Dan suffered abuse and neglect because all the symptoms were there: self injury, internalized anxiety, and difficulty trusting people.

Initials
7. I gave Dan a camera for his birthday or Christmas, and he broke down in tears—grateful, happy tears—and said it was the first present he ever received. Dan’s reaction came from a deep place of emotions. Given my experience now, and looking back, I would diagnose Dan with Post-Traumatic Stress Disorder at the time he lived in my group home.

8. I never met Dan’s parents, which was unusual. While the other boys had regular visits and home passes, no one visited Dan. Typically, I met the child’s parents and the parents actively participated in the child’s rehabilitation.

9. Because Dan had no one, he clung to me. Dan was lost, needy, and always wanted to belong. Dan was my sidekick and followed me around. When I came home, Dan was the first one at the door waiting for me.

10. One summer, Lisa and I took Dan and the other boys on a trip to Oregon, Washington, and Idaho. While in Idaho, we went to my family’s week-long reunion. We had good times and played music, and when it was time to leave, we could not find Dan. He had run into the woods and hid from us because he did not want to leave. Dan continued to visit my father and sent us cards after he left the group home. My parents responded to Dan’s cards, but I am not sure I did. Dan loved and was attached to me and my family.

11. Dan was also connected to a social worker, Cynthia “Cindy” Kline, who came to the group home often and worked closely with the boys. When Cindy left for another job, Dan was so upset he broke his thumb.

12. The boys in the group home picked on Dan because of his looks. Dan was tall, skinny, and clumsy. He had a fair complexion and big, sad eyes. Dan looked sad all the time.

13. While I am not against the death penalty across the board, I do not believe Dan should be executed. After learning about the crime, this does not fit the Dan I knew. Dan was a follower. The only thing to get him to that point was probably drug use.

14. I was contacted in 2010 by an investigator with the Federal Public Defender Office. Before that time, no one from Dan’s prior defense teams had ever contacted me. If someone had contacted me, I would have provided them with all of this information that I have provided in this declaration today.

Initials
15. I have provided this information of my own free will.

Signed this 17th day of March, 2011.

[Signature]

Name (Printed)  Thomas M. Moore

City, State  Salmon, Idaho

ER 000134
DECLARATION OF JACK DONOHUE

I, Jack Donohue, declare the following to be true to my best information and belief:

1. My name is Jack Donohue, I am the son of Barbara Williamson.

2. I met Daniel Cook, who I know as Danny, when we were children. I think we met in the fourth grade. We lived in the same neighborhood in Mission Hills, California.

3. I had a crush on Danny's older sister, Debbie. That is what drew me to Danny's house.

4. I knew even as a young child that Danny was neglected at home. Anyone would have been able to see that Danny was neglected. There was no love for Danny, and he was like an outsider in his own home.

5. I remember Danny's mother, Wanda. I despised Wanda because of how she treated Danny when he was a kid.


7. As a child, I saw Danny looking beat up, with bruises. I suspected those came from his mother.

8. I felt so bad for Danny and the way he lived that I brought him to my house to meet my family. My mother, Barbara, treated Danny like one of her own sons. When my mother would buy something for me, she would also buy something for Danny. Danny ate dinner at our house often and joined us on family outings. I was closer to Danny than my own half-brother.

9. When we were children, my half-brother and I joined a Boy Scout Troop which had been newly created for our area. My step-father, Lloyd Williamson, helped run the troop. He was assisted by a man named Paul Butler who was the "first aid guy," though he didn't know much about first aid. Paul Butler later committed suicide when confronted with allegations he molested members of the troop. Paul sexually abused me.

10. As a child, Danny was not violent. I don't recall Danny ever acting out.

11. Danny went away for a while when we were children, I later learned he went to a boy's home. I did not speak with Danny when he lived at the Boys Home or while he was in foster care.

12. I remember at some point later, Danny came back into my family's life. We were going to move to Idaho and my mom asked Wanda if we could take Danny with us. Wanda said go ahead and take him. I could never understand why Wanda would just give her kid away.

13. Danny moved with my family to Idaho. My mother tried to give Danny a good upbringing and structure in his life. She tried to give him hope that he was loved.
14. As teenagers in Idaho, we did what teenagers do. We would party, and I would end up breaking down and spilling my guts to Danny about the abuse I suffered. Danny never told me directly that he had been abused, but he would comfort me by telling me he had been there and that it had happened to him, a lot of times with a lot of people.

15. I do not know if Paul Butler also abused Danny. I think that Danny was abused by his step-brother, Kenny, as a child.

16. At some point Danny tried to join the Army, but he didn't do well and came back shortly after that.

17. In Idaho, Danny attempted suicide several times. Once I talked him out of jumping out of the car I was driving. Danny was going through his life saying that no one cared about him, I didn't know what to do with him and took him to the County Hospital.

18. Danny was self-destructive. Danny would cut himself all the time. Danny also burned himself. I think he was seeking attention to let people know that he was hurt emotionally.

19. Danny constantly wished he was dead and mutilated himself. Danny would ask me to help him out by shooting him.

20. Everyone who knew Danny knew that all he wanted was his mother's love.

21. Though my family tried to help Danny, no one knew the depths of his despair except me.

22. As much as I love Danny, he was not a leader. In his life, he was always a follower. Danny would do whatever me or my cousins did. It was my cousin Jeff Scott's idea to steal a school bus in Idaho, and Danny got caught.

23. I remember that Danny wrote a lot.

24. I think the time Danny spent with my family was probably the highlight of his life.

25. I have been told of the general details of Danny's crime. I still can't believe Danny did something like that. I shared a room with Danny and cannot believe he was capable of that type of crime.

26. Danny has struggled his whole life to know that he is a human being.

27. I do not want Dan to be executed.

28. I am giving this declaration by my own free will.

Signed this 18th day of March, 2011.

Jack Donohue

Jack Donohue
Declaration of Patricia Rose

I, Patricia Ann Rose, declare under penalty of perjury the following to be true to the best of my information and belief:

1. My name is Patricia “Patti” Rose. I met and became friends with Daniel “Dan” Wayne Cook while working at a restaurant in Lake Havasu, Arizona, in 1982. I worked as a waitress, and Dan worked as a dishwasher.

2. Dan was a follower and had a warped, misguided sense of loyalty to others. He had very little self worth and was often depressed. Dan was such a beaten, broken individual—it was as if you took the spirit out of a dog.

3. Dan had mood swings and seemed almost oblivious to pain. Dan punched a wall once when he was mad, causing his knuckles to bleed, and the pain did not phase him at all.

4. Dan was abandoned by his family and tried to cling to my boyfriend and me as his family. His mother and stepfather lived in a home in Lake Havasu, and Dan’s stepfather, John, did not allow Dan in their home. Dan’s sister Debbie had a hard time functioning and was very moody. Debbie went from one man to another and disappeared for days, abandoning her two children.

5. Dan was a big time alcoholic. When Dan drank, he sat there and melted into the scenery. He also smoked marijuana whenever it was available.

6. Dan had a hard time keeping a job. His hygiene was poor; he did not want to take a shower. He did not read well and drew a lot.

7. I lost contact with Dan for a couple of years. In August 1985, my husband and I were down at the English Village taking our baby daughter for a walk, and saw Dan sitting under the London Bridge. Dan was homeless, filthy, and hungry. We took Dan to our home, and he showered, ate, and then we took him back to the bridge. Dan did not say much and seemed not to mind being homeless during the hottest part of the summer in Lake Havasu.

8. Dan lived a very sad life. I do not want him to be executed. I do however feel that being found guilty of this crime, he should pay the penalty by remaining in prison. I feel that Dan could not have been the “leader” in this
crime; someone else must have been in the leader role. He was highly influenced by the people he hung out with and wanted to be accepted. He obviously was abused, mentally and physically.

9. An investigator with the Federal Public Defender Office contacted me in 2010. No one from Dan's prior defense teams had ever contacted me. If someone had contacted me, I would have provided them with all of this information that I have provided in this declaration today. I have provided this information of my own free will.

Signed this 10th day of February, 2011.

[Signature]

Patricia Rose
Name (Printed)

Chubbuck, Idaho
City, State