

IN THE CIRCUIT COURT OF CRAIGHEAD COUNTY, ARKANSAS
WESTERN DISTRICT

CHARLES JASON BALDWIN,

DEFENDANT/PETITIONER

vs.

NO. CR-93-450

STATE OF ARKANSAS

PLAINTIFF/RESPONDENT

**DECLARATION OF THOMAS E. QUINN, LICENSED PRIVATE
INVESTIGATOR**

I, THOMAS E. QUINN, declare that:

1. I am a Private Investigator currently licensed in California and formerly licensed in both Arkansas and California. I have not recently renewed my Arkansas license. At the request of John T. Philipsborn, known to me as a member of the California State Bar, I conducted investigation during post-conviction proceedings in the above-entitled case.

2. During the course of the investigation, I worked primarily in conjunction with Mr. Philipsborn, though I also met on occasion with attorney Blake Hendrix, known to me as an attorney from Little Rock, Arkansas, and as another lawyer working on Jason Baldwin's case.

3. On several different occasions during the past several years, I traveled to the State of Arkansas to conduct investigation in this matter. I conducted some investigation in Tennessee, Texas, Mississippi, Arizona, and California, but my primary focus was in

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Arkansas. During the course of my work on the case I interviewed a wide variety of persons including: current and former law enforcement officers; defense counsel; members of Jason Baldwin's family; former staff at the Juvenile Detention Unit, Jonesboro, Arkansas; former detainees at the Juvenile Detention Unit, Jonesboro, Arkansas; school classmates of Jason Baldwin's; former teachers at Marion High School, where Jason Baldwin attended school.

4. In addition, I interviewed a number of persons who had known Jason Baldwin at or near the time of the crimes charged in this case, including persons who had lived in Lakeshore Trailer Park, and young women who in 1993 were school girls who had known Jason Baldwin.

5. As my schedule and available funds permitted it, I investigated the case in consultation with Mr. Philipsborn, concentrating my efforts on behalf of the defense of Jason Baldwin.

6. I periodically consulted with Ron Lax, known to me as a Private Investigator with offices in Memphis, Tennessee. I was aware that Mr. Lax had conducted investigation prior to the trials of these matters on behalf of the Echols and Misskelley defenses. I was informed during the course of my own investigation that the Baldwin defense lawyers had not retained an investigator at time of trial, and had not used Ron Lax's firm to pursue the Baldwin investigation. I acquired some of the leads that I

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pursued from materials provided to me by Ron Lax, whose investigative work-product, as I understand it, was never requested by the Baldwin defense at trial. With the exception of interviews of expert witnesses, and obtaining affidavits from such experts, I believe that I was responsible for the primary interviews of most witnesses interviewed on behalf of the Jason Baldwin defense during this post-conviction investigation, and where necessary, I provided and reviewed draft affidavits with persons who had indicated their willingness to provide affidavits to the Baldwin defense.

7. As part of my work on the case, I reviewed police files and records as contained in material made available to trial counsel. I have reviewed material in the possession of current post-conviction counsel for Mr. Baldwin that was obtained either from counsel for Jessie Misskelley, or counsel for Jason Baldwin, or both. The material consisted of numerous law enforcement generated materials including: transcripts of tape-recorded witness interviews; notes of contacts with potential witnesses; various sorts of police reports; crime scene reports, and the like.

8. In addition to the work summarized above, I made personal contact with Steve Jones, identified to me as a former Crittendon County Juvenile Probation Officer, whose direct supervisor was Jerry Driver. The in-person interview occurred at his residence on Charles Street in Rockdale, Texas. During the course of my contacts with Mr. Jones and

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members of his family, I acquired several phone numbers, email addresses, as well as Mr. Jones' date of birth and social security number.

9. Mr. Jones and I spoke in person, and I prepared a set of typewritten notes of my interview with him. In the aftermath of my contacts with him, with the assistance of counsel, a draft affidavit was prepared. Mr. Jones relocated after my 2005 interview with him.

10. During my interview of him, Jones informed me that I was the first investigator who had talked to him since the completion of the trials in this case. During the course of our interview, Mr. Jones became highly emotional, and began to cry. His wife comforted him until he was able to regain his composure.

11. According to Mr. Jones, Jason Baldwin was no longer on probation at the time of the killings. Probation Officer Steve Jones had been Baldwin's supervising probation officer prior to that time. According to Jones, he had no problems with Jason Baldwin on probation. He had not known Jason to be angry, violent, or to have ever lied to him. According to what Mr. Jones told me, he had no clue, and did not know of evidence, that Jason was connected to the three victims who were killed. Mr. Jones told me that he never understood how a jury could have convicted Jason Baldwin.

12. According to Steve Jones, both before and after the killings occurred in May, 1993, the Juvenile Division Probation Office was getting calls about "satanic stuff"

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occurring in the County. Mr. Jones told me that Damien Echols' name was on the top of the list of those discussed in the calls. Jones indicated that one of the calls had come from Bo Henry, and that other calls had come from parents in Lakeshore Trailer Park.

13. He stated that he was aware that Jason Baldwin was reported to have been seen in Damien Echols' company.

14. Mr. Jones reported to me that he was present when the bodies of the three boys were found. He had noticed a piece of clothing in the water and had called West Memphis Police Officer Mike Allen who was searching. Mr. Jones told me that he and Mr. Allen were on the north side of the drainage ditch in which the bodies were found. Officer Allen was bending over the ditch and slipped and fell into the water, and as he got up, one of the dead children was laying across his leg. Mr. Jones told me that this image has stuck with him since that time.

15. Mr. Jones told me that he believed that Jason Baldwin had been on his case load in 1992 or thereabouts. He told me that he met with Jason more than a dozen times, sometimes at Jones' office in Marion, and at other times in Lakeshore. Jones told me that he had met Jason Baldwin's mother and his brother Matthew.

16. Mr. Jones told me that in his view Jason Baldwin was the sort of non-violent kid who would go off probation and you would never see him again. Jason did not have an attitude problem. His attitude was that he had messed up once and he would not do it

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again. Baldwin always reported to the probation officer whenever Mr. Jones wanted him there. Mr. Jones always found Jason Baldwin either at Jason's home in Lakeshore or at Jason's school on the occasions that Jones visited Baldwin.

17. Mr. Jones told me that it was his opinion that his boss Jerry Driver had wanted to play a public role, for which he could be credited, in the context of the case. According to Jones, it was Jerry Driver who pushed the satanic angle in the case.

18. Mr. Jones had stated that there were on occasion reports of animals in the Crittenden County area being mutilated during satanic rituals. He remembered one occasion on which he went out to investigate the report from Bo Henry of a dog that had been slain in this context, and Jones told me that he saw the remains of the dog which had obviously been run over by a car or truck on the Interstate.

19. Jones told me that he never found any evidence of ritualized killings of animals or evidence of satanic activity.

20. Mr. Jones told me that while he participated in some of the investigation that focused on Damien Echols, including conducting an interview with Damien Echols with Lt. Jim Sudbury of the West Memphis Police Department, it was Jerry Driver, rather than he, Steve Jones, who was most focused on Damien Echols. Mr. Driver believed that because Damien Echols was always wearing black, and rumors were that his parents in

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Oregon were involved in satanism, anyone associated with Damien was involved in satanism.

21. I reviewed with Mr. Jones some of the descriptions of the investigation of the case contained books on it including *Blood of Innocents* and *The Devil's Knot*.

22. Mr. Jones told me that at no time did any of the defense lawyers for Jason Baldwin contact him or interview him in connection with the case. He explained to me that while Jason Baldwin was in the Juvenile Detention Unit in Jonesboro, Arkansas, he (Jones) had traveled there and met with Jason Baldwin. Jones told me that he told Baldwin that he did not believe that Baldwin was guilty, and he also stated that he had offered his assistance.

23. Mr. Jones told me that he believed Jason Baldwin was innocent, and that if Jason Baldwin ever got out of prison he would have no problem inviting Jason into his family's home, and asking him to look after Jones's ten year old son. Such was the strength of his belief in Baldwin's innocence.

24. In part because of the content of my interview with Mr. Jones, and at the urging of attorney John Philipsborn, I sought on several occasions to meet again with Mr. Jones. While he agreed to sign an affidavit, Mr. Jones never thereafter returned my calls.

25. I am informed and believe that even after I attempted to secure an affidavit from Mr. Jones, Mr. Jones consented to an interview with another Investigator, this one

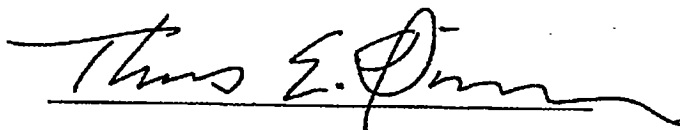
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from Ron Lax's office, who was also able to interview Mr. Jones.

I declare under penalty of perjury that the foregoing is true and correct except as to those matters alleged on information and belief, and as to those matters I believe this Declaration to be true and accurate.

Executed this 27th day of May, 2008, at Fresno, California.



THOMAS E. QUINN
Declarant

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