

C-4

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MARION

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3 ELIZABETH DIANE DOWNS )  
4    ) Petitioner, )  
5    ) v )  
6 ROBERT SCHIEDLER, Superintendent )  
7    ) Oregon Womens Correctional Ctr. )  
8    ) Defendant. )

No. 87-C-11753  
AFFIDAVIT  
MARK ANDRESEN

9 STATE OF OREGON )  
10    ) ss.  
11 County of Marion )

12 I, Catherine Conrad, being first duly sworn on oath depose  
13 and say:

14 That I am the law clerk for Petitioner's Post Conviction  
15 Attorney in the above entitled action.

16 I spoke to Mark Andresen outside the home of Jack Shannon at  
17 94825 Hwy 99W on December 9, 1990 at around 1 p.m. I asked him  
18 if he knew Christie--he said he did and so I asked him about the  
19 picture. He confirmed that he had attended Kennedy School with  
20 Christie and that she had shown him a picture of a man with  
21 shoulder length hair and a beard who had shot them. I asked him  
22 if he spoke to Christie about the incident, he said no that she  
23 just showed him the picture of a man she said did it. He said  
24 this happened before school. He did not remember who the teacher  
25 was.

26 He would not tell me where his mother had moved to --just

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STEVEN H. G. RHAM  
341 STATE STREET  
SALEM, OREGON 97301 364-6494

OSB # 75-136

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OSB # 75-136

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said Eugene somewhere. He was reluctant to say Martha saw the picture but sort of did-yeah, no-how would I know sort of response. I asked where Martha was--he said she was at work. I asked where she worked-he said he didn't know, he didn't keep tabs on her. He wasn't hostile-he was more indifferent-kept shrugging, pretty much a typical 16-year old boy.

On the way out, I talked to Julie the younger sister (about 12/13) and asked her where Martha was. She told me she worked at the A & W there in Junction City. I asked her if she could run and get her mom's address and phone number. She did.

I make this affidavit in support of Petitioner's Post Conviction attached Statement of Facts as ordered by the Court.

*Catherine Conrad*  
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Catherine Conrad

Subscribed and Sworn to before me this <sup>14</sup>7<sup>th</sup> day of January, 1991.

*Arthur H. Colver*  
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Notary Public for Oregon  
My Commission expires: 12/31/91