

Wendy R. Willis, OSB 94496
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELIZABETH DIANE DOWNS,)	
)	
Petitioner,)	No. CV 96-900 (HA)
)	
vs.)	AFFIDAVIT OF
)	WILLIAM J. TEESDALE
SONIA HOYT, Superintendent,)	
Oregon Women's Correctional Center,)	
)	
Respondent.)	
STATE OF OREGON)	
) ss.	
County of Multnomah)	

I, WILLIAM J. TEESDALE, being first duly sworn, depose and state as follows:

1. I am an investigator in the Federal Public Defender's Office and have been assigned to work on the Elizabeth Diane Downs matter.

2. On June 25, 1997, I interviewed Roxie Ann Haynes about her former husband, James Claire Haynes. Based upon that interview and subsequent conversations with Roxie

Haynes, I prepared a draft affidavit, which I sent to Ms. Haynes on August 27, 1997. A copy of this draft affidavit is attached to this document as Exhibit "1" and is the document that I prepared based on Ms. Haynes's statements.

3. After I sent Ms. Haynes the draft document, I had at least two telephone conversations with her, where she told me that she was not certain whether she was willing to sign the document. Each time I talked with Ms. Haynes, she expressed great fear of her ex-husband, and what he might do to her if he found out about her affidavit.

4. On June 4, 1998, fellow Federal Public Defender investigator, Toni Pisani, and I met with Roxie Haynes and asked her whether she would be willing to sign the affidavit. At that time, Ms. Haynes told us that she was too scared about what Mr. Haynes might do to her and she declined to talk to us further.

5. After our brief contact with Roxie Haynes, Ms. Pisani and I were approached by Mike Eaton, Roxie Haynes's current husband, who told us that Roxie still has considerable medical problems because of injuries caused by Jim Haynes, and she has regular nightmares about him.

DATED this 1th day of July, 1998.



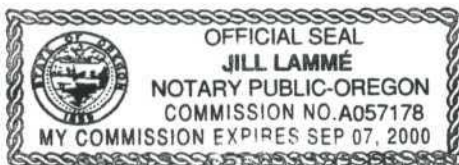
WILLIAM J. TEESDALE

SUBSCRIBED AND SWORN TO before me this 1th day of July, 1998, by William J. Teesdale.



Notary Public for Oregon

My Commission Expires: 9/7/2000



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Attorney for Petitioner

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELIZABETH DIANE DOWNS,)	
)	CV No. 96-900 HA
Petitioner,)	
)	AFFIDAVIT OF
vs.)	ROXY ANN HAYNES
)	
SONYA HOYT, Superintendent,)	
Oregon Women's Correctional Center,)	
)	
Respondent.)	
)	
STATE OF OREGON)	
)	ss.
County of Lane)	

I am the former wife of James Claire Haynes. I was married to Mr. Haynes for about 17 years. I have heard other people say Jim Haynes confessed to them that he was the person who attacked Diane Downs and her children in 1983.

I personally know that James Haynes is a very violent man. During my marriage to Haynes, I was assaulted by him numerous times. On one occasion Mr. Haynes broke my nose when he was demonstrating how he could kill someone with one karate blow to the nose.

Another time Haynes knocked me out with a steel toed boot. He brought me round by putting me in the shower, but refused to allow me to go to the hospital. Instead he insisted we go straight out to get pizza.

I also recall another time when Mr Haynes played "Russian roulette" with me by aiming a revolver at me with one round in the cylinder and then pulling the trigger. Mr. Haynes thought that was funny. Mr Haynes used to brag about being a member of a "broken arm" society and also talked of "dynamiting" people.

During our relationship Mr. Haynes became increasingly withdrawn. Up until I was divorced from Mr. Haynes in 1984, he would be absent for longer and longer periods and at all hours of the night. I was afraid to ask him what he had been doing because I was afraid he would attack me. I do know that he was involved with drugs. About the time of my divorce, Mr Haynes began to say strange things about the devil and the occult. I remember that if I mentioned God he would talk about making a cross for the Devil.

After I was divorced from Haynes I saw a television show called the "Leeza Gibbons Show." The program was about the Diane Downs case. James Haynes appeared on that program and denied that he was the person who had attacked the Downs family. Some time after watching that program I was contacted by Mr Haynes. At that time he told me that investigators were trying to question him about the Diane Downs case. Mr. Haynes said that it was possible that I would be contacted. Mr. Haynes told me to tell investigators that he could not have been involved in the attack on the Downs family. I do not know why he wanted me to make up a false story. We were already divorced when the crime occurred, and even if we had not been, I could not have provided an alibi because he was always out at all hours of the night.

I never reported Mr. Haynes to the police for assaulting me because I was afraid of him. I have now been divorced from him for over ten years and I am still fearful of what he could do. I am worried about providing this affidavit to the Court if Haynes finds out about it.

ROXY ANN HAYNES

SUBSCRIBED AND SWORN TO BEFORE ME this ____ day of _____,
1997.

Notary Public for Oregon