



FLORIDA
DEPARTMENT of
CORRECTIONS

Governor
JEB BUSH

Secretary
MICHAEL W. MOORE

An Equal Opportunity Employer

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AFFIDAVIT

STATE OF FLORIDA
COUNTY OF BRADFORD

1. My name is William Mathews. I am employed by the Department of Corrections as a Physician's Assistant - Certified at the Florida State Prison located in Raiford, Florida. I have been employed at Florida State Prison since 1981.

2. During late 1999 and early 2000, I was involved in the development of the lethal injection procedures and execution day protocols and I provided testimony during hearings related to the Terry Sims execution. The Florida Supreme Court approved the department's lethal injection procedures and the execution day protocols in *Sims v. State*, 754 So.2d 657 (Fla. 2000). I have been at Florida State Prison during each of the executions carried out by lethal injection.

3. All executions by lethal injection have been carried out under the same procedures and protocols that were reviewed by the Florida Supreme Court in *Sims*. No changes have been made to these procedures or the execution day protocols.

4. On or about January 4, 2006, Arthur Dennis Rutherford was examined by medically qualified execution team members in preparation for the execution set for January 31, 2006. To protect their identities, these execution team members wore surgical masks and hair nets and surgical garb. No documentation was produced in connection with this examination. This examination was conducted so these execution team members could prepare themselves for the lethal injection process. This type of examination has been conducted prior to each of the executions carried out at Florida State Prison.

FURTHER AFFIANT SAYETH NAUGHT.

Affiant

STATE OF FLORIDA
COUNTY OF BRADFORD

SWORN TO (OR AFFIRMED) AND SUBSCRIBED BEFORE ME THIS 9th DAY OF January,
2006, by WILLIAM MATHEWS, who is personally know to me.



Donna Jean Young
Commission #DD326632
Expires: Jun 06, 2008
Bonded Thru
Atlantic Bonding Co., Inc

(Notary Public)