

# **Exhibit B**

AFFIDAVIT

STATE OF FLORIDA,  
COUNTY OF Union

I, Willie B. Watson, the undersigned, being first duly sworn, do hereby state under oath and under penalty of perjury that the following facts are true:

1. I am over the age of 18 and am a resident of the State of Florida. I have personal knowledge of the facts herein, and, if called as a witness, could testify competently thereto.
2. I am currently employed as a Correctional Officer Lieutenant with the Florida Department of Corrections and am assigned to the Union Correctional Institution ("Union C.I.") in Raiford, Florida. I have been a Florida State Correctional Officer for nearly 17 years and have served as a Correctional Officer at Union C.I. for approximately 15 years.
3. In November of 1992, I began my career as a Correctional Officer for the State of Florida when I commenced Correctional Officer training at the facility run by the Florida Department of Corrections in Raiford, Florida. I graduated in February 1993 after I successfully completed this training, which involved approximately 480 hours of instruction. Upon graduation, I became a Correctional Officer 1 and was assigned to serve at Union C.I. In 1998, I earned promotion to Correctional Officer Sergeant and, in 2008, I earned promotion to Correctional Officer Lieutenant, which is the position/rank I currently hold.
4. Aside from a brief assignment in Gainesville, Florida, I have spent nearly my entire career – 15 of 17 years – as a Correctional Officer at Union C.I. Most of the time I have spent at Union C.I. has been working at its Death Row housing unit ("Death Row").
5. My responsibilities as a Correctional Officer at Union C.I. have generally included the supervision, care, custody, control and physical restraint, when necessary, of inmates. Specifically, my duties have included, but are not limited to the following:
  - supervision of inmates in housing units and those segregated for administrative or punitive measures;
  - instruction to inmates in housekeeping and sanitation;
  - supervision of the issuance of clothing and other personal effects to inmates;
  - periodic patrols of quarters and work areas and initiation of inmate counts at regular and irregular intervals;
  - maintenance of control and discipline including use of physical restraint and restraining devices;
  - prevention of the introduction of contraband into the institution through mail, visitors, or otherwise;
  - monitoring, supervision and screening of inmate visitor traffic;

*W. B. Watson*

- counseling with inmates regarding institutional, domestic or emotional adjustment problems;
  - coordination with Control Room operations;
  - participation in search of inmate recreation areas, work areas, and housing units to prevent the introduction of contraband items; and
  - maintenance of proper security of inmates being transported.
6. Crosley Green has been an inmate on Death Row at Union C.I. since I commenced my assignment as a Correctional Officer there in 1993. Accordingly, I have known Mr. Green for nearly 17 years and my contact with him during this time period has been extensive.
  7. Based upon my extensive contact with Mr. Green in the nearly 17 years in which I have known him, I have been able to closely observe him. Mr. Green has always been and continues to be a model inmate. He has always been well-mannered and I have never known him to be a disciplinary problem while at Union C.I. Mr. Green has always been and continues to be extremely courteous and respectful of Correctional Officers, staff members, and other inmates. He has also volunteered to assist Correctional Officers and staff members at Union C.I. when called upon to do so and I believe he has always been forthright and honest. Based on my extensive contact with Mr. Green, I have formed an opinion regarding his character for truthfulness, which is that Mr. Green is a truthful person.
  8. Over the course of my nearly 17-year career as a Correctional Officer with the Florida Department of Corrections, I have had contact with thousands of other inmates and have observed them as well. Again, independently and/or relative to the other inmates I have observed, Mr. Green always has been and continues to be a model inmate. In this regard, I would rank him at the top of all the inmates I have observed during my career as a Correctional Officer. I should also note that, in my entire career, I have never before offered testimony on behalf of an inmate, but feel compelled to do so in this case based upon my high regard for Mr. Green.
  9. It is my understanding that there will be a hearing on August 31, 2009 in Mr. Green's case that may impact his current sentence and could result in him being transferred to the general population housing units at Union C.I. or another facility. Based upon my experience and extensive contact with Mr. Green, any modification of his sentence that would involve such a transfer should neither place Mr. Green or any other inmate at risk nor give rise to any potential disciplinary problems. Again, Mr. Green has always been a model inmate and his characteristics that demonstrate this should remain regardless of the facility or unit in which he is housed.
  10. To the extent any modification in Mr. Green's sentence might make him eligible in the future for parole, his record as a model inmate also demonstrates that he should be an ideal candidate for parole. Based upon my experience and extensive contact with Mr. Green, I believe he could become a productive and law-abiding member of society.



- 11. Lastly, although it may not be material and be beyond the scope of the purpose of my testimony, I will add that since meeting Mr. Green nearly 17 years ago, I have become familiar with some of the facts and circumstances regarding his case. It is not uncommon for Correctional Officers and staff members to do so in assessing security issues for inmates. While I understand that Mr. Green was convicted of murder and two counts each of robbery and kidnapping, it is also my understanding that his conviction was based largely on the testimony of several witnesses and that most of the witnesses who testified against him have since recanted their testimony. I know that Mr. Green has and continues to maintain his innocence of the charges for which he was convicted. He remains steadfast in this regard to this day. While I will not comment upon his conviction or the underlying evidence, I will simply re-state my personal opinion, based on my extensive contact with him, that Mr. Green is a truthful person.
- 12. I respectfully request that the Court presiding over Mr. Green's re-sentencing hearing take the foregoing into account in making any determinations regarding his case.

Executed this 28 day of August, 2009 in Union County, Sanford FL.

Willie B. Watson  
WILLIE B. WATSON

CERTIFICATE OF ACKNOWLEDGEMENT

STATE OF FLORIDA  
COUNTY OF Union

The foregoing document was acknowledged before me this 28<sup>th</sup> day of August, 2009 by WILLIE B. WATSON.

NOTARY PUBLIC-STATE OF FLORIDA  
Cynthia Duncan  
Commission # DD491688  
Expires: NOV 17, 2009  
Bonded Thru Adante Bonding Co., Inc.



Cynthia Duncan  
NOTARY PUBLIC OR DEPUTY CLERK

Cynthia Duncan  
[Print, type, or stamp commissioned name of notary or clerk]

*[Handwritten mark]*

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF Union

I, Jerome Lee, the undersigned, being first duly sworn, do hereby state under oath and under penalty of perjury that the following facts are true:

1. I am over the age of 18 and am a resident of the State of Florida. I have personal knowledge of the facts herein, and, if called as a witness, could testify competently thereto.
2. I am currently employed as a Correctional Officer Sergeant with the Florida Department of Corrections and am assigned to the Union Correctional Institution ("Union C.I.") in Raiford, Florida. I have been a Florida State Correctional Officer for approximately 18 years and have served as a Correctional Officer at Union C.I. for approximately 17 years.
3. I began my career as a Correctional Officer for the State of Florida in the early 1990s when I commenced Correctional Officer training at the facility run by the Florida Department of Corrections in Raiford, Florida. Upon graduation, I became a Correctional Officer 1 and was assigned to serve at Union C.I. In 2005, I earned promotion to Correctional Officer Sergeant, which is the position/rank I currently hold.
4. I have spent nearly my entire 18-year career with the Florida Department of Corrections as a Correctional Officer at Union C.I. For the past 7 years – since 2003 – I have worked at the Death Row housing unit ("Death Row") at Union C.I.
5. My responsibilities as a Correctional Officer at Union C.I. have generally included the supervision, care, custody, control and physical restraint, when necessary, of inmates. Specifically, my positions while assigned to Death Row have included the following: Yard Officer (2003 – 2004), Housing Sergeant (2005 – 2006), Visiting Park Sergeant (2006 – 2007), Recreation Yard Sergeant (2007 – 2008), and Law Library Sergeant (2008 – present).
6. Crosley Green has been an inmate on Death Row at Union C.I. since I began work at Union C.I. My primary contact with Mr. Green, however, began in 2003 when I commenced working on Death Row at Union C.I. My contact with him during this time period has been extensive.
7. Based upon my extensive contact with Mr. Green, I have been able to closely observe him. Mr. Green has always been and continues to be a model inmate. He has always been well-mannered and I have never known him to be disciplinary problem while at Union C.I. Mr. Green has always been and continues to be extremely courteous and respectful of Correctional Officers, staff members, and other inmates. He has also volunteered to assist Correctional Officers and staff members at Union C.I. when called upon to do so and I believe he has always been forthright and honest. Based on my

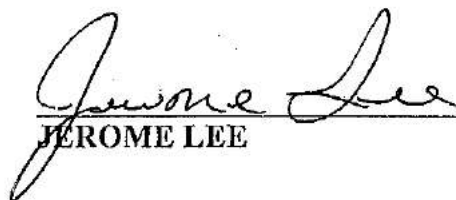
JL



extensive contact with Mr. Green, I have formed an opinion regarding his character for truthfulness, which is that Mr. Green is a truthful person.

8. Over the course of my 18-year career as a Correctional Officer with the Florida Department of Corrections, I have had contact with thousands of other inmates and have observed them as well. Relative to the other inmates I have observed, I would rank Mr. Green at the top of all the inmates I have observed during my career as a Correctional Officer.
9. It is my understanding that there will be a hearing on August 31, 2009 in Mr. Green's case that may impact his current sentence and could result in him being transferred to the general population housing units at Union C.I. or another facility. Based upon my experience and extensive contact with Mr. Green, I believe that such a transfer should neither place Mr. Green or any other inmate at risk, nor give rise to any potential disciplinary problems. Again, Mr. Green has always been a model inmate and his characteristics that demonstrate this should remain regardless of the facility or unit in which he is housed.
10. To the extent any modification in Mr. Green's sentence might make him eligible for parole in the future, his record as a model inmate also demonstrates that he should be an ideal candidate for parole. Based upon my experience and extensive contact with Mr. Green, I believe he could become a productive and law-abiding member of society.
11. Although it may be beyond the scope of the purpose of my testimony, I will add that since meeting Mr. Green, I have become familiar with some of the facts and circumstances regarding his case. It is my understanding that his conviction was based largely on the testimony of several witnesses and that most of the witnesses who testified against him have since re-canted their testimony. I know that Mr. Green has and continues to maintain his innocence of the charges for which he was convicted. While it may not be my place to comment on the proceedings in his case, I will simply re-state my opinion, based on my extensive contact with him, that I believe that Mr. Green is a truthful person.
12. I respectfully request that the Court presiding over Mr. Green's re-sentencing hearing take the foregoing into account in making any determinations regarding his case.

Executed this 28<sup>th</sup> day of August, 2009 in  
Rainford, Florida.

  
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JEROME LEE

CERTIFICATE OF ACKNOWLEDGEMENT

STATE OF FLORIDA

COUNTY OF Union

The foregoing document was acknowledged before me this 28<sup>th</sup> day of August, 2009 by JEROME LEE.

NOTARY PUBLIC-STATE OF FLORIDA  
Randall S. Luffman  
Commission # DD788469  
Expires: MAY 14, 2012  
BONDED THRU ATLANTIC BONDING CO, INC.

Randall S. Luffman  
NOTARY PUBLIC OR DEPUTY CLERK

Randall S. Luffman  
[Print, type, or stamp commissioned name of notary or clerk]

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF UNION

I, Randolph L. Salle, the undersigned, being first duly sworn, do hereby state under oath and under penalty of perjury that the following facts are true:

1. I am over the age of 18 and am a resident of the State of Florida. I have personal knowledge of the facts herein, and, if called as a witness, could testify competently thereto.
2. I am currently employed as a Correctional Officer Lieutenant with the Florida Department of Corrections and am assigned to the Union Correctional Institution ("Union C.I.") in Raiford, Florida. I have been a Florida State Correctional Officer for 23 years and have served that entire time as a Correctional Officer at Union C.I.
3. In 1986, I began my career as a Correctional Officer for the State of Florida when I commenced Correctional Officer training at the facility run by the Florida Department of Corrections in Raiford, Florida. Upon graduation, I became a Correctional Officer 1 and was assigned to serve at Union C.I. In 1993, I earned promotion to Correctional Officer Sergeant and, in 2007, I earned promotion to Correctional Officer Lieutenant, which is the position/rank I currently hold.
4. Most of the time I have spent at Union C.I. has been working at its Death Row housing unit ("Death Row"). In fact, I began working on Death Row in 1993, shortly after it was opened in 1992.
5. My responsibilities as a Correctional Officer at Union C.I. have generally included: the supervision, care, custody, control and physical restraint, when necessary, of inmates. Specifically, my duties have included, but are not limited to the following:
  - supervision of inmates in housing units and those segregated for administrative or punitive measures;
  - instruction to inmates in housekeeping and sanitation;
  - supervision of the issuance of clothing and other personal effects to inmates;
  - periodic patrols of quarters and work areas and initiation of inmate counts at regular and irregular intervals;
  - maintenance of control and discipline including use of physical restraint and restraining devices;
  - prevention of the introduction of contraband into the institution through mail, visitors, or otherwise;
  - monitoring, supervision and screening of inmate visitor traffic;
  - counseling with inmates regarding institutional, domestic or emotional adjustment problems;
  - coordination with Control Room operations;



- participation in search of inmate recreation areas, work areas, and housing units to prevent the introduction of contraband items; and
  - maintenance of proper security of inmates being transported.
6. Crosley Green has been an inmate on Death Row at Union C.I. since I commenced my assignment as a Correctional Officer there in 1993. Accordingly, I have known Mr. Green for nearly 17 years and my contact with him during this time period has been extensive.
  7. Based upon my extensive contact with Mr. Green in the nearly 17 years in which I have known him, I have been able to closely observe him. Mr. Green has always been and continues to be a model inmate. He has always been well-mannered and I have never known him to be a disciplinary problem while at Union C.I. Mr. Green has always been and continues to be extremely courteous and respectful of Correctional Officers, staff members, and other inmates. He has also volunteered to assist Correctional Officers and staff members at Union C.I. when called upon to do so and I believe he has always been forthright and honest. Based on my extensive contact with Mr. Green, I have formed an opinion regarding his character for truthfulness, which is that Mr. Green is a truthful person.
  8. Over the course of my 23-year career as a Correctional Officer with the Florida Department of Corrections, I have had contact with thousands of other inmates and have observed them as well. Again, independently and/or relative to the other inmates I have observed, Mr. Green always has been and continues to be a model inmate. In this regard, I would rank him at the top of all the inmates I have observed during my career as a Correctional Officer. I should also note that, in my entire career, I have never before offered testimony on behalf of an inmate, but feel compelled to do so in this case based upon my high regard for Mr. Green.
  9. It is my understanding that there will be a hearing on August 31, 2009 in Mr. Green's case that may impact his current sentence and could result in him being transferred to the general population housing units at Union C.I. or another facility. Based upon my experience and extensive contact with Mr. Green, I believe that any modification of his sentence that would involve such a transfer should neither place Mr. Green or any other inmate at risk nor give rise to any potential disciplinary problems. Again, I have always known Mr. Green to be a model inmate and his characteristics that demonstrate this should remain regardless of the facility or unit in which he is housed.
  10. To the extent any modification in Mr. Green's sentence might make him eligible in the future for parole, his record as a model inmate also demonstrates that he should be an ideal candidate for parole. Based upon my experience and extensive contact with Mr. Green, I believe he could become a productive and law-abiding member of society.
  11. Since meeting Mr. Green nearly 17 years ago, I have become familiar with some of the facts and circumstances regarding his case. While I understand that Mr. Green was convicted of murder and two counts each of robbery and kidnapping, it is also my

understanding that his conviction was based largely on the testimony of several witnesses and that most of the witnesses who testified against him have since re-canted their testimony. I know that Mr. Green has and continues to maintain his innocence of the charges for which he was convicted. While I will not comment upon his conviction or the underlying evidence, I will simply re-state my personal opinion, based on my extensive contact with him, that Mr. Green is a truthful person.

- 12. I respectfully request that the Court presiding over Mr. Green's re-sentencing hearing take the foregoing into account in making any determinations regarding his case.

Executed this 28<sup>th</sup> day of August, 2009 in Union County, Raiford, Florida

Randy Salle  
RANDOLPH L. SALLE

CERTIFICATE OF ACKNOWLEDGEMENT

STATE OF FLORIDA .  
COUNTY OF Union

The foregoing document was acknowledged before me this 28<sup>th</sup> day of August, 2009 by RANDOLPH L. SALLE.

Cynthia Duncan  
NOTARY PUBLIC OR DEPUTY CLERK

Cynthia Duncan  
[Print, type, or stamp commissioned name of notary or clerk]

NOTARY PUBLIC - STATE OF FLORIDA  
Cynthia Duncan  
Commission # DD491688  
Expires: NOV 17, 2009  
Bonded thru Adante Bonding Co., Inc.

RS

**DECLARATION OF SERGEANT J. WALLACE**

State of Florida, County of \_\_\_\_\_

I, Sergeant J. Wallace, the undersigned, do hereby state under penalty of perjury that the following statements are true and correct:

1. I am over the age of 18 and am a resident of the State of Florida.
2. I am currently employed as a Correctional Officer with the Florida Department of Corrections and am assigned to the Hardee Correctional Institution in Bowling Green, Florida.
3. I have been at Hardee Correctional Institution for about nine years and I have known Crosley Green since he arrived here. I have had regular interactions with Mr. Green over the years, and in the past year in particular, I have had extensive contact with Mr. Green, as we have both been working in the same dorm.
4. Since I have known Mr. Green he has never been a problem inmate. I have never had an issue with him and he has had no disciplinary or behavioral issues. He is even-keeled and I have never heard anyone say anything bad about him. He is a regular guy, just going about his time. He does what he is supposed to do. You could call him an outstanding inmate.
5. I do not think that Mr. Green poses any threat to society. In fact, I think he would be just fine going back out into society.
6. I respectfully request that the Court presiding over Mr. Green's Motion for Release Pending Appeal take the foregoing into account in making any determinations regarding his case.

Executed this 25<sup>th</sup> day of September, 2018



SGT. J. WALLACE