

STATE OF ILLINOIS)
COUNTY OF GRUNDY)

AFFIDAVIT OF GARY R. GARRETSON

I, GARY R. GARRETSON, being first duly sworn and under oath, do hereby depose and state as follows:

1. I am currently an attorney licensed to practice law in the State of Illinois. I was admitted to the practice of law in 1977. I am currently practicing general law, defense law and family law in Morris, Illinois, in Grundy County.

2. In 1981, I was serving as an Assistant State's Attorney of LaSalle County, Illinois. At that time, I prosecuted the case of Steve Broadus, who had been charged with the first degree murder of a tavern owner.

3. One of the State's main witnesses at Mr. Broadus' trial was William Dummett of the LaSalle County Sheriff's Department. Cpt. Dummett was unable to testify in person at Mr. Broadus' trial due to an illness, and so he made a taped statement of his testimony which was presented to the jury.

4. In his testimony, Cpt. Dummett claimed that there weren't any other photographs, except those known to exist as part of discovery in the case. Those photographs had been provided to Daniel Bute, who represented Mr. Broadus.

5. Mr. Bute was insistent that other autopsy photographs existed, and that Mr. Broadus' confession was based on his viewing a photograph of the deceased person, slumped over with a bullet wound to his back.

6. A witness, who was a local reporter, had signed an affidavit to the effect that that person had seen the same photograph Mr. Broadus had seen. I believe the affidavit may be part of the court file.

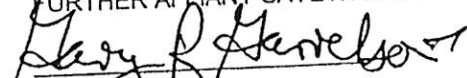
7. At my insistence, Cpt. Dummett's personal desk was searched for additional photographs. I personally pried open Cpt. Dummett's desk. I don't recall exactly who was present at the time, but Tom Templeton, a deputy of the LaSalle County Sheriff's Office, was present.

8. In Cpt. Dummett's desk were seven or eight 8x10 photographs and a set of about 50 negatives. The photographs and negatives were of the crime scene and of the deceased person.

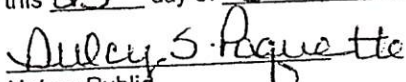
9. The photographs and negatives had never been disclosed. I believe they were all taken by Cpt. Dummett.

10. Copies of the photographs and the negatives were turned over to Mr. Bute.

FURTHER AFFIANT SAYETH NOT.


Gary R. Garretson

Subscribed and sworn before me
this 23rd day of Dec 2004.


Notary Public

