

COPY FILED

IN THE CIRCUIT COURT FOR WILLIAMSON COUNTY, TENNESSEE

JOE HERBERT, CLERK

D.C.

RICHARD C. TAYLOR

Petitioner,

vs.

STATE OF TENNESSEE

Respondent.

Case No. 990-211

AFFIDAVIT OF SGT. DALE HUNT

Sergeant Dale Hunt, being duly sworn, states under oath as follows:

1. I have been a prison guard employed by the Tennessee Department of Corrections continuously from 1974 through the present. I hold the rank of sergeant.

2. I was a guard at the Tennessee State Penitentiary during the entire period that Richard Taylor was incarcerated there from August 1981 to 1989. During that time, I was assigned to Unit Six at the Penitentiary where Richard Taylor was initially housed. I was later re-assigned to Unit One. Richard Taylor also was moved to Unit One. During the years Richard Taylor was incarcerated at the Tennessee State Penitentiary, I was the guard in charge of my shift at the Units where Richard Taylor was housed. In my work at the Tennessee State Penitentiary, I saw Richard Taylor on a daily basis.

3. On June 19, 1996, I was interviewed about Richard Taylor by his attorneys Bradley MacLean and Sabin Thompson. Sue Palmer was also present. I agreed that the interview could be tape recorded.

4. Attached hereto as Exhibit A is an accurate transcript of my tape recorded interview. All of the statements I made in the interview, as set forth in the attached transcript, are true and correct to the best of my knowledge, information and belief.

FURTHER THE AFFIANT SAITH NOT.

Dated: 6/22/96

Sgt Dale Hunt
Sergeant Dale Hunt

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

Sworn to and subscribed before me, this
the 22nd day of June, 1996.

[Signature]
Notary Public

My Commission Expires: 11/30/97

CERTIFICATE OF SERVICE

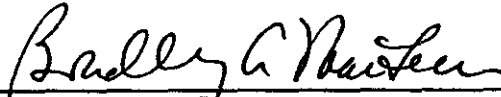
I hereby certify that a true and correct copy of the foregoing Affidavit has been mailed

first class, postage prepaid to:

Joseph D. Baugh, Esquire,
Williamson County District Attorney General's Office
P.O. Box 937
Franklin, TN 37065

Glenn Pruden, Esquire
State Attorney General's Office
450 James Robertson Parkway,
Nashville, TN 37243,

this 24th day of June, 1996.



Bradley A. MacLean

6/19/96 Interview With
Sgt. Dale Hunt

MacLean = Brad MacLean
Hunt = Sergeant Dale Hunt
Palmer = Sue Palmer
Thompson = Sabin Thompson

MacLean: Sergeant Hunt, I'm Brad MacLean. We've met before and I want to thank you once again for agreeing to meet with us to talk about Richard Taylor. We met last week...the group of us did and at the end of that meeting, you agreed to meet with us again today and to go back over what you told us last time...to go back over that while being tape recorded.

Hunt: That's correct.

MacLean: Okay. Let me just go over some background things so we get everything down. Today is Wednesday, June 19. It's about 3 o'clock in the afternoon. We are in the parole meeting room at Riverbend Maximum Security Institution. We're here with Sergeant Dale Hunt. I'm Brad MacLean. Also here is Sabin Thompson and Sue Palmer. And the four of us met exactly a week ago today, last Wednesday, the 12th of June, I believe.

Hunt: That is correct.

MacLean: Okay. Why don't you just go again over for us your background, when you started working for the Department of Corrections and what happened since then.

Hunt: Okay. I started the Department of Corrections in 1974. I worked in the max unit in 1974 and then from there I went to all the different units at the institution. That's Unit 1, 2, 3, 4, SDC, Gym and basically, I've done just about everything that you can do at the institution at that time.

MacLean: When you started working for the Department of Corrections in 1974 [tests tape].

Let's see if this works. We've had trouble with the tape and now we'll see if this works.

Sergeant Hunt, when you started working with the Department of Corrections in 1974, how old were you at that point?

Hunt: I turned 19 on October 19 of '74 so I'd been there about five or six months at the time.

MacLean: When you turned...

Hunt: No, I turned 20 in October the 19 of '74.

MacLean: So you started...

Hunt: In May.

MacLean: ...when you were 19 years old.

Hunt: Right.

MacLean: And you worked at the Tennessee State Penitentiary from the beginning when you started in 1974?

Hunt: Until it closed.

MacLean: And it closed in 199...

Hunt: '90...

MacLean: 1.

Hunt: '91. You're right.

MacLean: Alright. What have been your ranks, your positions?

Hunt: Well, I made corporal in 1977. Then in 1985 I made sergeant. Then that's where I'm at today.

MacLean: What is a corporal?

Hunt: It's just a...it's a line supervisor basically. That means you have...you're in charge of each unit and then from there, the sergeant's in charge of the corporal. He makes sure that the corporal does his job. It's just like the military. You just walk on up the ladder.

MacLean: Were you a corporal at Tennessee State Penitentiary in August of 1981 when Richard Taylor was transferred there?

Hunt: Yes, I was.

MacLean: Where were you assigned?

Hunt: At the time, I was assigned to the death row. That's Unit 6, death row at the main prison.

MacLean: Do you remember when Richard Taylor came to Unit 6 in 1984?

Hunt: 1981, you mean?

MacLean: I mean 1981.

Hunt: Yes, I do.

MacLean: Tell us about that. What do you remember?

Hunt: Well, I remember he had kind of long hair and...and that we wanted to...how can I put this...make it hard on the guy.

MacLean: Okay. Let me...let me start off here. You knew before he arrived that he was going to arrive.

Hunt: That's correct.

MacLean: How did you know that?

Hunt: Our _____ told us.

MacLean: What did you know about him before he arrived?

Hunt: I knew that he had killed one of the officers at Turney Center.

MacLean: Alright. And you knew that he was being transported directly from Turney Center to your unit at the penitentiary in Unit 6? Correct?

Hunt: That's correct.

MacLean: And you were there when he was taken into Unit 6?

Hunt: That is correct.

MacLean: Describe his appearance and his demeanor when he arrived at Unit 6.

Hunt: Well, he was real nasty. I can tell you that. 'Cause he smelled bad.

MacLean: By nasty, you mean he smelled bad.

Hunt: He hadn't took a bath or anything for probably a couple of weeks.

MacLean: All right.

Hunt: He shook all the time. He was shaking the day we brought him...you know...they brought him in. And he didn't want to take his clothes off so we ripped them off of him. Just the normal routine in Unit 6 at the time.

MacLean: What was your attitude and the attitude of the other guards towards Richard at the time?

Hunt: We wanted to make it as rough as we could on the guy.

MacLean: What do you mean by that?

Hunt: Well, we...we wouldn't do anything for him. A lot of times, we wouldn't feed him. We'd skip his cell.

MacLean: I'm talking about just initially, the first day or two.

Hunt: That's what I'm talking about.

MacLean: Okay. Were you physically abusive with Richard Taylor?

Hunt: Only when we took him out of the cell for a shower. That's when we would kind of smack him around a little bit.

MacLean: What do you mean by smack him?

Hunt: Well, we'd smack him up beside his head. We'd hit him on the back of the head. Just trying to make him do something to us.

MacLean: Why? Why were you that way towards him?

Hunt: Well, we know he'd killed one of our co-workers and we wanted to make it horrible for him there.

MacLean: Did any of the guards that were working with you know Ronald Moore, the guard that had been killed at Turney Center?

Hunt: I don't actually know if they knew...they knew of him, but they...you know...we all kind of knew each other all over the state. We've all worked together at one time or another. But I personally didn't know the guy.

MacLean: Okay. Describe your observations about Richard's mental condition at the time he arrived at TSP.

Hunt: Well, I started noticing after the first couple of weeks that something was wrong with the guy. He started drinking his own urine out of the commode and he would eat his own bowel movement 'cause that's when I start to

know something was wrong and I would go get the officers and say, "Man, come here and look at this." And these guys would get sick watching him do it and that's when I noticed that he was... something wasn't right.

MacLean: Was he like that from the very beginning?

Hunt: First couple weeks we noticed it. And we'd all get sick. (laughs) I still...as a matter of fact, I tell a lot of the new people of this...of what happened when this guy would drink these body fluids and eat urine [sic] and they just don't believe me. I say, "Man, I'm telling you it happened." That's why I know.

MacLean: Have you ever seen a case like that before?

Hunt: I've seen 'em smear it on the walls, but I've never seen 'em actually eat it.

MacLean: During the first couple of months that Richard was at the penitentiary, can you describe the way he was treated by the guards?

Hunt: We put him through pure hell. I'm talking about we would...I don't know if I should be telling you this or not, but we'd get in the air chamber back there and cut the water on and off him and probably...we probably made it a lot worse for him...on him and we'd get back in the air chambers and I hadn't told you this before, but I just remembered some more stuff that we'd get back there and make voices and...

MacLean: What chamber is this?

Hunt: It's the air chamber behind each cell.

MacLean: The air chamber.

Hunt: You'd get inside of it and you can...you can kind of look in the cell and we would get in and cut the water on him and off and we'd speak like in "Jesus Christ is coming to see you" and all this kind of stuff and this guy went plum crazy! And we tried to make him a lot crazier than what he was.

MacLean: Okay. Did you ever hit him with a billy club?

Hunt: The only thing that I done to him that I remember well is I got a phone book out. He had refused to do something. I don't really remember what it was. I took a phone book out and I took one of the billy clubs and put the phone book on his head and hit him with it. And that's the kind

of stuff we...because we didn't want to leave any marks on the guy so that's how we done it.

MacLean: How did the warden's office...did they know what was going on?

Hunt: Yeah. They knew what was happening, but they just...they would just tell us, "Hey, we don't want to catch you doing any of that stuff. If we do, we're gonna fire you." But they knew what was going on.

MacLean: Was there an occasion about four to six weeks after Richard arrived at TSP that Warden Rose came to talk to you about Richard?

Hunt: He came and talked to the whole unit. He said, "You all need to leave that man alone. And if you don't, I'm going to fire you." But he knew what was going on.

MacLean: What prompted him to come to the unit to tell you about that?

Hunt: Evidently, one of the chaplains or somebody came over there and checked on the guy and they went and told the warden.

MacLean: When did this happen? How long after...

Hunt: It was probably...that was probably a couple months...

MacLean: ...after Richard arrived.

Hunt: Right.

MacLean: Okay. What were the types of things that you were doing to Richard that Warden Rose was telling you to stop doing?

Hunt: Well, we'd rip his clothes up. We wouldn't feed him. We'd refuse his rec to go outside. We'd just mark it down. We had a little _____ sheets that'd say if he wanted a rec, and we always put "refused" on it.

MacLean: Whether he refused or not?

Hunt: If he refused or if he wanted to go, we'd still put "refused."

MacLean: So you wouldn't let him out of the cell?

Hunt: We wouldn't let him out.

MacLean: For how long at a time?

Hunt: This probably went on for a couple...two or three weeks and we'd let him out one day. It wouldn't...then we'd start again. It was...we tried...everyday that we come in, all of us, we would always stop by his cell to do something to the guy. That's either throw water on him or...I mean...'cause we wanted to make it hard on the guy. And we tried.

MacLean: Did you treat any other inmates like that?

Hunt: No. No.

MacLean: Have you ever treated any other inmates like that?

Hunt: (laughs) I'm sure I have.

MacLean: Okay. Now about food. You mentioned before something about food. What kind of food would Richard get?

Hunt: Well, if he did get anything, it would be lettuce or something. That's it.

MacLean: You wouldn't feed him, basically.

Hunt: Yeah.

MacLean: For what periods of time?

Hunt: In...it went on for a long time. I really don't know. It went on for a long time. See? Actually, the inmates actually done the feeding at the time and he'd always bypass him. The inmate...yeah. Some of the inmates was involved too. I don't exactly know who they were, but we had inmates working for us.

MacLean: Did this start happening from the very beginning when Richard arrived at the penitentiary?

Hunt: That's right.

MacLean: So from the very beginning, he was not getting fed. Is that correct?

Hunt: Now we'd feed him, but it would probably be...we'd do that for a couple of days and then we'd feed him a little something, then we'd take it away from him again, feed him lettuce or a piece of bread. Then we'd start back up. We'd give him a meal. It went on like that for a long time.

MacLean: Did it go on like that for more than year?

Hunt: Probably on and off. But he would get commissary now. And that would be the main thing he'd eat. See, a lot of times he threw it...threw it out at us anyway so we just made it and say, "Well, if he's gonna throw it out, we just don't need to give him nothing."

MacLean: What is commissary? What do you mean by that?

Hunt: It's candy bars. It's something they can order from the ...like the store.

MacLean: Okay.

Hunt: And he can get honey buns and popcorn or whatever it may be.

MacLean: But he would have to pay for it, right?

Hunt: He would have to pay for that if he wanted it.

MacLean: And if he didn't have any money, he wouldn't get...

Hunt: He don't get anything.

MacLean: Do you know whether he had any money back then?

Hunt: I have no idea. We really didn't care if he got anything or not.

MacLean: Showers. What was the story about showers?

Hunt: We just didn't...we'd bypass his cell for a couple weeks at a time.

MacLean: So you wouldn't let him take a shower.

Hunt: We wouldn't let him take a shower, no.

MacLean: How long did that...did that begin from the very beginning of when he arrived at the penitentiary?

Hunt: That started probably a couple of weeks after. You know ...we didn't know how to...we was...we just tried to make it hard on him. I mean...we tried every way in the world to make him go off on us.

MacLean: Were you looking for an excuse to do something to him?

Hunt: Right. That's exactly right.

MacLean: So you were taunting him and doing...

Hunt: That's exactly right. Yep.

MacLean: To make him act so that you could re-act to him.

Hunt: That's right.

MacLean: How long did he go without taking a shower at any one stretch?

Hunt: I know a couple of two or three weeks.

MacLean: Was there a time when the smell got so bad that you felt that you needed to do something about?

Hunt: Then finally we'd have to force shower him then. That way we could get in there and smack him around and make him...get him by the hair, head, pull him out and shower him.

MacLean: Was there a period where...while he was not getting a shower he was rubbing his stool and his urine all over his hair and his body?

Hunt: That's exactly...and that's another reason why we didn't... he was doing all that kind of stuff and I didn't even want to be around the guy, really. So we just let him stay in there and rot for a long time.

MacLean: And you didn't care if he...

Hunt: No. And finally the inmates got complaining, "Hey, man, you all need to let this guy take a shower 'cause it's killing us back here on this wall 'cause we don't want to smell him." So we'd let him take a shower.

MacLean: Was there a time when you dressed up in...

Hunt: Rain suits? Yeah, we'd do that. Rain coats. Gloves. The whole bit.

MacLean: Why would you do that?

Hunt: To keep from ever touching him.

MacLean: Because he was so messed up.

Hunt: Oh, he would have it all in his hair or smeared...I mean... it was all over the guy.

MacLean: During this period of time, starting from the time he arrived at the penitentiary, was he basically in solitary confinement?

Hunt: The whole time.

MacLean: The whole time he was at the penitentiary.

Hunt: The whole time he was at the main prison, he was.

MacLean: Now he left the main prison I think in 19...

Palmer: 1989.

MacLean: 1989. So you're saying from 1981 when he arrived there right after the Turney Center incident until he left the penitentiary in 1989 he was in solitary confinement.

Hunt: Right. And actually it even got worse for him because they moved him from Unit 6 to Unit 1 lockup. They made this a special walk down there just for some of the inmates that they couldn't control so he was one of them.

MacLean: So he was in a cell all by himself. Is that correct?

Hunt: All by himself.

MacLean: Okay. I believe that he moved to Unit 1 at the same time your assignment moved to Unit 1. Is that correct?

Hunt: I believe so.

MacLean: And Unit 1 was right near where the electric chair was?

Hunt: No. Unit 1...Unit 6 is where the electric chair was.

MacLean: Okay.

Hunt: He was moved from there to Unit 1. That was away from it.

MacLean: All right. When he was in Unit 6, was he put in the death watch cell?

Hunt: He was...no, he wasn't. Now he was put in a lot of cells, but four walk was on the walk, the same walk where the electric chair was. Now he might have been put back in one of the back cells close to it, but he never was put in the death watch cell 'cause we didn't...actually, we didn't have death watch going on back then.

MacLean: I thought that the last time...we talked with you, you said that he...when he was in Unit 1, he was in a metal cell which was one of two in the death watch section...

Hunt: No. That was death row section. We had one wall which was all death row and the rest of the unit was administrative segregation.

MacLean: Okay. Was this Unit 1 or Unit 6?

Hunt: This was Unit 1.

MacLean: All right. So, let's talk about the time he was in Unit 6 which is where he started. Correct?

Hunt: Right.

MacLean: In Unit 6, he was always confined to a cell by himself. Is that right?

Hunt: That's right.

MacLean: And how much time would he be allowed out of that cell on any one day?

Hunt: Well, if we did let him out, he'd get one hour.

MacLean: And he would go out in tothe rec yard by himself? Correct?

Hunt: That's correct.

MacLean: Was he ever in the same space with any other individual?

Hunt: I never did see him in the space with anybody.

MacLean: Except when he was being moved from one place to another by a guard.

Hunt: Right.

MacLean: When he was taken out of a cell, what was your procedure for taking him out of a cell to move him to someplace else?

Hunt: Well, now they had changed...the administration had changed over. At first, we didn't have to handcuff 'em when they come out. But they come out with a 'cuffin' policy and I don't exactly know what date it was on the 'cuffin' policy, but I don't think we had to even cuff the man at the time so when he come out, we'd always have billy clubs or something with us all the time.

MacLean: But you mentioned to us the procedure that you followed the last time we talked with you where you would make him completely undress every time he left his cell.

Hunt: We'd have him stripped completely down. That way, if he had a weapon or something, we could see it.

MacLean: Okay.

Hunt: So we'd usually strip-search 'em the whole time...the whole time he was over there.

MacLean: Okay. But you said that you would...in order to move him out, you would first tell him that he had to strip off all of his clothes. Correct?

Hunt: That's correct.

MacLean: And then he would stick his arms through the hole in the cell door and you would put cuffs on him, correct?

Hunt: Now at one time, we didn't have to do this. See, I got thinking back on exactly how we done him there and when he first came, we didn't have to put handcuffs on him, but maybe a couple of months passed and we started...the warden said, "I want you to start cuffing him." So..but that was the only man we cuffed.

MacLean: He was the only one that you treated that way.

Hunt: The only one we treated like that.

MacLean: And that was just a couple of months after he arrived.

Hunt: Right. But we didn't cuff anybody else.

MacLean: Okay. And so when you did that, you would make him strip off completely...

Hunt: Right.

MacLean: ...and then he would have to stick his hands through the hole in the cell door. Correct?

Hunt: Right.

MacLean: You would cuff him. Then you would let him out...

Hunt: Right.

MacLean: And then you would put him in a jumpsuit. Correct?

Hunt: Right. That's correct.

MacLean: And at that time you sometimes would beat him up a little bit?

Hunt: Well, we wouldn't actually beat him up, but we'd just smack him in the back of his head. Well, we'd always do something to him. It just depends on how he acted. If he acted strange that day, we'd smack him up aside his head and say, "Hey man, you need to straighten up. You're going to the hospital..." or wherever he might have went that day. But he very seldom went anywhere.

MacLean: Even though supposedly he would be allowed one hour of going out on the rec yard by himself, there were many days when you wouldn't let him have that hour.

Hunt: That's correct.

MacLean: All right. Then you moved to Unit 1, I think, in either '83 or '84, somewhere around that time?

Hunt: Right.

MacLean: And that's when Richard was moved to that unit. Correct?

Hunt: That's correct.

MacLean: Now when he was in Unit 6 (we're going back to Unit 6), what was your shift?

Hunt: It was 10:00 to 6:00.

MacLean: And that straddled two different shifts.

Hunt: Right. I was on both shifts.

MacLean: So you were four hours at the end of one shift and four hours at the beginning of the other. Why was that?

Hunt: Well, it's...I wanted basically to work and wanted the thing to run exactly the same all the time.

MacLean: And you were the corporal in charge...?

Hunt: Right.

MacLean: ...of both of those shifts.

Hunt: Right. But they had a lieutenant there too, but the lieutenant...we never did see him, so...and I don't exactly know who the guy was, but I know he was a

lieutenant in the charge of the whole building, but he never was there.

MacLean: At that time, had you hand-picked the crew that was working with you at that time?

Hunt: Not at that time. That was when Unit 1.

MacLean: All right. Then you went to Unit 1 and what was your shift in Unit 1?

Hunt: It was...we worked ten-hour days so it was from 12:00 to 10:00.

MacLean: Four days a week?

Hunt: Four days a week.

MacLean: All right. And you were the corporal in charge of that shift?

Hunt: I was...if it's in '83 or '84, I made corporal, I think, in '84 or '85. So I was down there as a corporal part time and then I made sergeant.

MacLean: And you were in charge of that shift?

Hunt: Right.

MacLean: And you hand-picked the crew for your shift at that time?

Hunt: I hand-picked the crew. That's correct.

MacLean: And what kind of guards did you pick?

Hunt: Well, back in the old days, they used to call it the Goon Squad, so I picked some of the biggest, the meanest guys I could find because there was a lot of rough guys down there and you had to be strong to work there.

MacLean: Were you ever afraid of Richard when he was there?

Hunt: Naw. No. I wasn't. No.

MacLean: Okay.

Hunt: Nobody was that I worked with.

MacLean: Okay.

Hunt: Now there was a lot of people afraid of him. Some of the inmates were afraid of him.

MacLean: Right. But you, the guards, were not.

Hunt: No.

MacLean: And you weren't afraid of him because you were tough and you had control over him.

Hunt: Well, I don't know about being tough, but we just wasn't afraid of him.

MacLean: Okay. Was there an incident one time when Richard set his clothes on fire inside of his cell?

Hunt: Yeah. I don't know why he done it, but he set his clothes on fire and we just...they had big vents in the back of the cell going up and we just turned the vent on to kind of help it along a little bit.

MacLean: Help the fire along?

Hunt: Yep.

MacLean: To make the fire worse?

Hunt: Well, to make it a little hotter, I guess you could say.

MacLean: And why did you do that?

Hunt: I have no idea. I was young. I don't know.

MacLean: To make it worse for Richard?

Hunt: Probably so.

MacLean: You said that -- last time -- that if the guards had had an opportunity to kill Richard, they would have done that.

Hunt: If they...if we could have got away with it, we probably would have.

MacLean: But you also said you didn't want Richard to kill himself.

Hunt: No. I wanted him to suffer as much as he could.

MacLean: And you made it so that he would suffer as much.

Hunt: Right.

MacLean: Last time we met, when you described Richard at the time he arrived at the penitentiary in August of 1991...'81

from Turney Center, you said that he was in bad shape. "The guy was so mentally messed up, he was gone." Is that an accurate statement?

Hunt: That's correct. He was...the man didn't even know where he was at and we tried to help him along a little bit to even make it worse for him.

MacLean: You said that he was not together, that he wouldn't talk. He only mumbled. Is that correct?

Hunt: He would very seldom speak to us, but when he did, you couldn't understand what he was saying so we kind of made fun of him and mock him and...we made it hard on the guy. I mean...you'd just have to be there to actually understand what all went on. I mean...it's not...it goes on all the time. Today. Not with him, but it still goes on in the jails and here and any institution.

MacLean: Right. You also mentioned...now when you were describing Richard as being totally messed up, being completely gone, just mumbling whenever he would talk, was that the way he was when he first arrived?

Hunt: That's the way he was. He was in...the guy...he was shaking. He...it's hard to explain to you exactly how he was. He was like "one flew over the cuckoo's nest." The guy that played in the movie -- what's his name? He was in pretty bad shape. He was like that. It's just...but you know...we was glad he was like that. We just...we was hoping he would croak over at the time.

MacLean: You also mentioned that he would spend long periods of time just staring at the walls?

Hunt: He would get in front of his cell...now I remember this well. He's get in front of his cell. He would get completely naked in his cell and he'd put a white sheet around him and he had this long hair. I mean, it was real long and a beard and he would tell us he was Jesus Christ. And I'd get everybody and I'd say, "Man, come and look what he's got on now." And...and at that time, that's when I really remember well because he said, "I want to show you something, Hunt." He took a styrofoam cup and he started urinating in it. Then...the reason why I remember this is 'cause I had a big dip in my mouth and he started drinking this urine and I started vomiting all over the floor, man. I couldn't...it was awful. And when he done that, I said, "Man, I know this guy's crazy. He's got to be."

MacLean: Have you ever seen anybody as messed up as Richard?

Hunt: Not at that time. No. He was about the worst I've ever seen. Now we had some guys that were...I mean...if a guy was going to be crazy, if he was acting, he wouldn't be acting for years and years and years. I mean...it just don't make sense to me.

MacLean: So you don't think he was faking?

Hunt: No. He wasn't faking. And I've heard that the court said he was faking, but if he was, I don't know where they was at 'cause the guy was...five or six years, he was like that.

MacLean: Now you said that everybody knew that he was not sane.

Hunt: Everybody. From the nurses to the wardens to all the employees that worked there, all the inmates, they all knew he was insane.

MacLean: You said that the rest of the guys on death row were pretty sane, but not Richard.

Hunt: No. He was about...he was the worst I've ever seen. The rest of the guys...they kind of understand what was going on, but he was in bad shape.

MacLean: And you said last time, "I don't know how they could say he was sane. This guy was completely nuts."

Hunt: That's exactly right.

MacLean: And you also said last time, "He was not faking. He was like that for years. A person putting on an act would not do it for years. I know when a man is crazy. This man was completely gone."

Hunt: That's exactly right.

MacLean: Now last time you mentioned that Richard sometimes would sit for months at a time in a cell totally naked.

Hunt: That's correct.

MacLean: Tell us about that.

Hunt: Well, he would just...he was either smearing stools all over the wall and so we'd just take it away from him and try to clean him and we just decided, "Well, if he's going to do it all the time, we're just going to not give him anything." And he would take his underwear off and t-shirt and he just be there naked all the time.

MacLean: How...what kinds of...

Hunt: It just went on for months and months on and off. He'd go through these stages like that. Then he'd go on stages of not cutting his hair for months and months. Then he'd go on stages having a beard for months and months. Then he'd shave it all off. Then he'd grow it all back. He just different...he would go through different stages.

MacLean: Did anybody ever pay any attention to Richard? Ever talk with him or give him any company during this time?

Hunt: Well, I'm going to tell you a little story and it's kind of don't actually pertain to him, but at one time in Unit 1, we had a guy down there who was five years past his red date 'cause nobody'd seen him. So that should tell you something that nobody ever came down there to see anybody at the time so...and when the guy asked about his red date, he said...well...he was afraid to say anything because he was afraid they'd whoop him. That's a little bit before me, but I was there when it was going on and they was just kind of afraid to ask for anything.

MacLean: Okay. And Richard was like that too?

Hunt: He wouldn't ask for anything and the nurses wouldn't come and see him. They was...they just wouldn't come...I don't understand why, but they just didn't.

MacLean: Did Richard have any communication with any other inmates during that period of time?

Hunt: Nobody ever talked to him.

MacLean: So he was basically totally isolated?

Hunt: Yeah.

MacLean: Guards wouldn't talk to him...?

Hunt: Oh, well, yeah. We'd talk to him. We...

MacLean: Only when you were taunting him.

Hunt: Right. We'd talk to him. Get in the air chambers and make voices and...you know...we were just young. Just tried to make it hard on the guy.

MacLean: But other than that, no one else would talk to him at all.

Hunt: No one'd talk to him.

MacLean: Okay. Do you know whether he had any visitors from the outside world?

Hunt: I don't ever remember him having any...I mean...he might have, but I don't remember.

MacLean: All right. [tape skips]

Hunt ...trouble or anything.

Thompson: It helps explain why he acted so bizarre in the trial and that kind of thing so...

Hunt: You know, I just don't want this right here to get me in trouble 'cause they knew it was going on and they sometime would call us and say, "Hey we want you to take care of this problem," and we knew what it meant. But I just don't want to get in trouble for saying these kind... 'cause a lot of people don't know this stuff happened.

MacLean: Were you ever called about Richard Taylor...you know...from anybody else saying, "Take care of him," or "Do him in," or anything like that?

Hunt: No. Oh, it was always somebody saying, "Hey, man, you all need to go ahead and kill him for attention," but...you know...we...we worked at a prison. We would hate to be back in there so we didn't...we didn't try to kill him or anything.

MacLean: And you didn't need to be told to rough him up or to treat him bad.

Hunt: I mean...everybody knew if you was in Unit 1, it was rough.

MacLean: Richard Taylor went to trial in 1984. He was transferred from Turney Center to the penitentiary right after the killing in late August of '81 and then he went to trial in the spring of '84. How would you compare his condition from what you could observe in 1984 at the time of his trial with the way he was in 1981 when he first arrived at the penitentiary?

Hunt: He'd gotten worse. He'd got worse. He was just...it was... he was doing things like...when he first came in, he was just putting the stools in his hair, but then he started just doing it...smearing it all over his whole body and we would kind of help him along and say, "Yeah, go ahead and do it, man. That's what you need to do. See

how long you can wear it." We just let him keep it all over him for couple of weeks and it was pretty bad.

MacLean: It would get caked up on him and everything?

Hunt: Yeah. In his hair. Sometimes he would sculpt it kind of like a cone head. You know he'd try to get it all sculptured up. (laughs) And we'd say, "Man, come here and look at this...what he's got going on today." It's just amazing what he'd do.

MacLean: You said last time that he was in no condition to be tried in 1984.

Hunt: I just don't see...how...you know...anybody could try somebody that was mentally not stable. I mean...I don't know what doctors seen him, but evidently they need to kind of look at the doctors who'd seen him 'cause this guy was in bad shape. I mean...there's no way this guy...I mean...I don't know if he knew what he was doing or not, but when he got to me, the guy wasn't in his right mind.

MacLean: You said that last time that back then in 1984 about the time of the trial he didn't even know what his name was?

Hunt: He didn't even know where he was at. Didn't know his name. Didn't know if he had a mother, daddy or what. That's correct.

MacLean: He was that messed up?

Hunt: He was that messed up. 'Cause I know. I was there with him. For four or five years I was with him. So every day five days a week, I know how he was. Now these evaluators...they were with him for a couple of hours and then they would...you know...I've been around those type people and I know they worked for somebody so if they worked for the county or whatever, they're...whatever the DA says is what they're gonna do basically. And...but the man was...he was a nut case. Even Warden Rose would tell you. If you asked him, I'm telling you, he knows the man wasn't right. He knows it. But I don't know if he'll tell you that, but I know the guy wasn't all there. And the thing about it. This has been bothering me all...I started not to do this interview with you because I felt like, "Well, maybe this guy does deserve to go to the electric chair." I don't know. But I started not to do it and then it got to bothering me. I said, "Man, I just can't see somebody going to...you know... being killed for something that he didn't know what was going on." I just felt bad about him so...but then again I looked at

it another way. I said, "Well, somebody's paying them so I might just come up here and tell 'em, 'well, if you want me to do this, I want some money.'" (laughs) See what I'm saying? I started to do that, but I said, "Naw, I can't do that either. I'm going to go ahead and tell the truth."

Palmer: If you got some money that we got...(laughs)

Hunt: And I did say that. I thought to myself, "I'm gonna do that." Then I said, "Man, I can't do that 'cause it's not..." I've done a lot of wrong stuff...don't get me wrong...while I've been in the Department of Corrections and after you get older you think back all the crazy stuff you've done and it's...it still goes on in some places. And I just don't see how I even made it this far. I mean...I've done some bad stuff to people in my life...for guys that's been locked up. But a lot of...most of them deserved it. And I don't...but this case right here, I just...I don't feel sorry for the guy. Don't get me wrong. But I just feel like somebody...ever who said the guy was sane to stand trial didn't know what they was talking about. And I'm a good judge of character. I know when somebody's not right and when they are. The guy's not right.

Thompson: You've worked quite a bit with Special Needs.

Hunt: I worked...I opened Special Needs up and...

MacLean: Tell me what Special Needs is.

Hunt: It's just a...it's kind of like people that's got problems and they have psychological doctors there. People that's one on one with them all the time to try to help them and they put them on medications to try to help different type of...what I'm trying to say...different type of moods a person could have. They put them on different medications and some of them...sometimes the guys down there got different personalities and they try to work with them on that kind of stuff.

MacLean: And you worked there from 1991 to '95?

Hunt: From '92 to '95. March of '95.

MacLean: All right.

Hunt: Then I got moved away for something that I'm not going to tell you about, but I got moved away. 'Nothing to do with inmates, but I had to leave.

MacLean: Okay. And then you were transferred over here to Unit 3.

Hunt: Right.

MacLean: What's your job here at Unit 3?

Hunt: It's the max unit here. It's with probably the roughest unit in the whole institution. Well, it is the roughest.

MacLean: Okay.

Hunt: And I don't know why they put me down there. I guess to make it hard on me for all these things I've done bad in my life, I guess.

MacLean: Sergeant Hunt, when we met with you last week and I asked you about his condition in 1984 at the time of the trial compared to his condition in '81 when he was first moved over to the penitentiary, you said that his condition was worse. It had to have been because you gave him pure hell during that period of time.

Hunt: That's exactly right.

MacLean: So one of the reasons why he went down hill in terms of his condition...

Hunt: Because he...he went down hill because nobody seen the guy and we made it as tough as we could on him. They didn't have psych doctors back in them days that come to see people all the time. They just didn't have 'em. And I've never knowed him seeing anybody. If they did, somebody lied. That's all I can tell.

MacLean: Did Richard continue to have tremors all the way through this period?

Hunt: He shook all the time. A little bit all the time.

MacLean: Was it worse sometimes than others?

Hunt: Sometimes it was.

MacLean: Can you tell us when it seemed to be worse?

Hunt: Probably when we didn't feed him. (laughs) I guess.

MacLean: Yeah.

Hunt: It probably was.

MacLean: Okay. In looking back on this, do you regret the way you treated...?

Hunt: No. I don't. I don't regret it, but I just kind of...after a certain amount of time you try to make it rough on a person and then you get to thinking with all the guys you worked with and say, "Man, maybe this guy is crazy, so just leave him alone." So we finally left him alone after years and years.

MacLean: Yeah.

Hunt: Finally just left him alone and said, "Let him be in his own little world by himself."

MacLean: That was after his trial.

Hunt: Right. It was back in...right before he left...back in '87 or '88 maybe. I don't know. Somewhere along right there.

MacLean: And I think you said last time...you said that when... that...you know...that when you realized that he wasn't operating on all four cylinders upstairs, then you started to slack off.

Hunt: Right. We did.

MacLean: And that was in the late 1980's?

Hunt: Right. And after that, we all kind of slacked off of him and I know he used to smoke all the time and he'd get real bad when he didn't have a cig so we just started buying him cigarettes and give him some Coca Cola every once in a while. And then I guess he got...when he moved here, he got a little bit better when he got down here. I don't know. I hadn't seen him since.

MacLean: You mean here at Riverbend?

Hunt: Right.

MacLean: All right. And you hadn't seen him from the time he moved to Riverbend until just a couple months ago?

Hunt: It's been about six months ago, I guess. Four months ago. I seen him for about five minutes and he said, "Hey, Hunt. How you doing? Will you help me with this?" I said, "Yeah, yeah, go ahead. Yeah. I'll see ya later." And I left. I didn't think y'all ever come here to see me. (laughs) "Yeah. Go ahead and tell him. I'll be out."

Yeah." That's exactly what I done. And here I am. I didn't actually know what he was talking about at first.

MacLean: Last time we were here, we asked you whether there were better and worse periods and you said, "There were no better times for him." That he was always in bad shape.

Hunt: He...because we made him. We made him be in bad shape. From '81 to whenever he came in until he left. Right at the end we kind of slacked up, but it was rough on him. We made it pure hell...If I could just remember and people that I worked with and we could get together and compare notes. I mean... we could tell you some stuff that's unbelievable. Oh, we'd talk about hanging him. I remember we used to say, "Well, ought to just hang you tonight." And we'd get us a sheet and throw it over and say, "We'll just hang you tonight, man. Go ahead and execute you ourself." But we never did would do it. We'd just tell him that. But he didn't know it. We'd do things like that to him...you know... before his trial. And the warden found out about it and...I don't know how he found out about it. He'd always chew us out, but he never did do anything to us because he couldn't... they couldn't prove it. We'd all kind of like a clan. We stuck together because if you didn't, you wouldn't have a job very long. So we kind of stuck together.

MacLean: You said last time that many of the instances of Richard's bizarre behavior would have been written down in the old log books back at...

Hunt: I'm sure if you could find 'em.

MacLean: But those were thrown away when...

Hunt: I'm sure they throwed everything they could away when they closed it down. Any prison that's closed...I know this for a fact 'cause some of the guys who worked there actually done the moving and anything they could find that would hurt them or help somebody else, they'd throw it away. Log books, your record of AWOLs that you've got while you was there. They'd make sure that stuff got away when they transferred. And I'm sure all the log books are gone. I'd bet on it.

MacLean: Now when...

Hunt: 'Cause there was a lot going on back...I think this was back...was this back in the Blanton days? '81? '82? '79? '80? Somewhere along there? There was a lot going on back in them days. And there was a lot of stuff going on.

MacLean: Well, it was back at the time when all that litigation was going on about the constitutionality of the prison system.

Hunt: Right. I'm sure it was all been thrown away. You might be able to find it, but I doubt it.

MacLean: All right. I don't have any questions. Do you have anything more?

Thompson: I don't think so.

MacLean: Thank you very much. We really appreciate it.

Hunt: Did I kind of sound like...I don't know...like I say, I don't know if I should even do...done this or not, but...you know...

MacLean: I just want...you know...we asked you to tell us about Richard and I just wanted to make sure that you told us...

Hunt: I don't know if I told you what all...everything that happened, but it's just been so long. There's just been so much I've been through since then. I'm sure there's a lot worse stuff that we done to him.

MacLean: Yeah.

Hunt: But...

Thompson: Well, you're just telling the truth.

Hunt: Well, I'm telling you the truth now. I'm not going to lie to you. I mean there's some stuff that I hadn't told you... not about him that I've done that I wouldn't tell anybody. But I don't do that anymore. I'm just letting you know that now. You can put that on record. I don't do that anymore.

MacLean: Okay. All right. Thank you very much.

Hunt: All right.



JUN 26 1996

WILLIAM S. RUSSELL

RETIRED PRESIDING JUDGE
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June 25, 1996

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RE: RICHARD TAYLOR v. STATE OF TENNESSEE

Gentlemen,

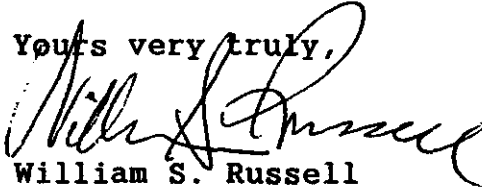
I have Mr. MacLean's letter of June 24, 1996, with enclosures.

The motion to reopen the proof will not be ruled upon until an official investigation of Mr. Hunt's statements is made. Rather than funding an investigator for Mr. Taylor's counsel, I am of the firm opinion that the State of Tennessee and the U.S. Department of Justice should investigate these allegations.

I instruct General Pruden and General Baugh to take all necessary steps to notify the Commissioner of Corrections, the office of the United States Attorney, and the District Attorneys General whose jurisdictions are involved. My hope is that an immediate coordinated and cooperative investigation will be conducted that will either verify or contradict guard Hunt's shocking statements.

Hon. Bradley A. MacLean
Hon. Sabin Thompson
Hon. Joseph D. Baugh
Hon. Glenn Pruden
June 25, 1996
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I want to be advised generally as to what will be done, and I will defer any decisions regarding the merits of this post-conviction proceeding until later.

Yours very truly,

William S. Russell
Judge, by designation

WSR:pl