

Petitioner's Exhibit #20

Affidavit of Julie Dotson

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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MARION

PHILIP S. CANNON,

Petitioner,

vs.

BRIAN BELLEQUE, Super., Oregon
State Penitentiary,
Defendant.

Case No.: 04C10127

AFFIDAVIT

State of Oregon)
) .ss
County of Marion)

I, Julie Dotson, after being first duly sworn under oath, say as follows:

1. On November 23rd, 1998, three people were killed in West Salem on property owned by Bimla Boyd. As far as I am aware, three people were killed – Jason Kinser, Celeste Graves and Suzan Osborne.

2. Thomas McMahon was my significant other during all relevant time periods.

3. McMahon and Jason Kinser, one of the victims, were friends and “drug” associates.

4. During the time period immediately preceding the killings and shortly thereafter, McMahon’s behavior became increasingly erratic and paranoid, as follows:

(a) About a month before the November murders, McMahon and a friend of his (“Matt”), decided that I was a “Fed” because I did not use drugs. To prove my loyalty and that I was not an informant, McMahon put a gun to my head and told me that I had to use a “line” with them. I was very scared so I agreed. The drugs made me very sick and I ended up in the emergency room. This was at the Salem Hospital.

1 (b) I left the hospital late that night with McMahon. I told him that I could not be with
2 him any longer. He got very upset and he tried to run our car off a cliff. He told me that if he
3 could not have me, no one could, that he would kill me by driving me off the cliff. He was
4 willing to kill me, himself and his friend in the back seat.

5 (c) The police arrived and the car, which crashed onto the beach. I told the police that
6 I'd been driving and that McMahon grabbed the steering wheel and steered the car off the cliff.
7 As far as I can remember, he was not arrested.

8 5. I sold McMahon's truck and he came after me with a metal pipe and swung it at my
9 head. I ducked and he hit the rear windshield of my father's car, smashing it. McMahon was
10 arrested for menacing. He was in jail for several weeks and was released.

11 6. He got out of jail several weeks before the murders and did not have any money. In
12 order to make some quick money, he and Jason Kinser decided to "cut" the dope with baking
13 soda.

14 7. Less than 24 hours after the murders, in the early morning hours of November 24,
15 1998, before there was any press coverage, McMahon called me and told me that Jason and
16 Suzan were dead. I was very suspicious because the news had not released any information
17 regarding the murders or the identity of the victims.

18 8. During that phone conversation, McMahon, who was very excited and worked up, told
19 me that "you should have seen the look on Suzan's face." He said that he witnessed the girls run
20 for their lives and hiding under the trailer. When I told him that I did not want to see him again,
21 he said told me that I was not "out of the game," that "I'm going to kill you." He also referred to
22 me as "JuJu," which is a nickname my mother gave me when I was little. He told me that he was
23 there, during the killings, that Suzan and Celeste were running from the killer and ended up
24 hiding under the trailer.

25 9. I also witnessed Thomas McMahon at Bimla Boyd's house/property using
26 methamphetamine with Kinser and with Bimla Boyd. McMahon was a regular at Bimla Boyd's
27 house. On at least one occasion, I witnessed Bimla Boyd use methamphetamine. She put the
substance on a foil sheet, took out a small pipe and inhaled it. Additionally, Bimla Boyd was a
drug addict. She allowed Kinser to live on her property in exchange for drugs. Bimla was very
odd. She acted "twitchy" and was very unpredictable.

10 10. Kinser told me that he had been providing "cut" to Boyd, which meant that he was
11 cutting the drug with baking powder. I told him he was crazy for giving fake dope to the woman
12 who was allowing him to live there.

1 11. I spoke with a detective from the defense team – some from Whitney Investigations.
2 He gave me a subpoena for trial but it had no date or time on it. I thought they would call with
3 the dates and time for me to testify but no one called.

4 x *JD*
Julie Dotson

5 SUBSCRIBED AND SWORN to before me this ^{*Shurt.*} ~~March 29, 2009~~ day of
6 March 20, 2009.

7 *[Signature]*
8 Notary Public of Oregon
9 My commission expires: 10-29-2012

