

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

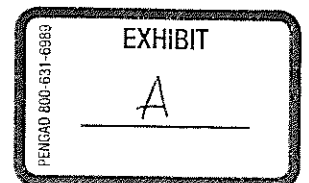
ROMELL BROOM :
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-vs- :
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TED STRICKLAND :

COUNTY OF SCIOTO))
STATE OF OHIO))

AFFIDAVIT OF ROMELL BROOM

I, Romell Broom do hereby state and attest to the following:

1. I am a death row inmate in the State of Ohio.
2. I had an execution date scheduled for Tuesday, September 15, 2009. The execution was to take place at the Southern Correctional Facility (SOCF), in Lucasville, Ohio.
3. Correction officials took me from the Ohio State Penitentiary to SOCF on September 14, 2009.
4. After my arrival, a nurse came over to where I was housed on J-1. The nurse came in found two veins on both my right and left arms, tied up my arm and took note of what she found.
5. After the nurse came in prison officials kept offering liquids. I accepted. During the day I drank coffee, Kool-Aid and water. I had seven cups of coffee, five cups of water and three cups of Kool-Aid.
6. On September 15, 2009, I woke up took a shower and talked to my brother on the phone. At one point, the death squad leader advised me that one of the courts was reviewing my case and that the execution was delayed pending the court's review. Because of the length of the delay, I believed that the court was going to accept my case for review.
7. However, at about 2:00 my attorney informed me that the court had denied my appeal and that there were no more avenues left. The state was going to go through with my execution.



8. While I was in the cell, Warden Phillip Kerns came in with guard escorts and read the death warrant to me. After that, two nurses came in and advised me to lay down. One of the nurses was a white male and the other was a white female.
9. There were three guards present in the room. One guard was on the right side of me, one was on the left side of me and one was at my feet.
10. The nurses were simultaneously trying to access the veins in my arms. The female nurse tried three separate times to access veins in the middle of my left arm. The male nurse tried three separate times to access veins three times in the middle of my right arm.
11. After those six attempts, the nurses told me to take a break. I continued to lay on the bed for around two and one half minutes.
12. After the break, the female nurse tried twice to access veins in my left arm. She must have hit a muscle because the pain made me scream out loud. The male nurse attempted three times to access veins in my right arm. The first time the male nurse successfully accessed a vein in my right arm. He attempted to insert the IV, but he lost it and blood started to run down my arm. The female nurse left the room. The correction officer asked her if she was okay. She responded, "No" and walked out.
13. The death squad lead made a statement to the effect that this was hard on everyone and suggested that they take another break. The male nurse then left. The correction officer on my right patted me on my right shoulder and told me to relax while we take a break. At this point, I was in a great deal of pain. The puncture wounds hurt and made it difficult to stretch or move my arms.
14. The male nurse returned with some hot towels which he applied to his left arm. The male nurse applied the towels to my arms and massaged my left arm. The nurse told me that the towels would help them access the veins.
15. After applying the towels, the male nurse attempted to access my veins once in the middle of my left arm and three more times in my left hand. After the third attempt to access veins in my hands, the nurse made a comment that heroin use affected my veins. I was upset with this comment because I never used heroin or any intravenous drugs. I told the nurse that I had never told him that I used heroin.
16. The male nurse kept saying that the vein was right there, but they could not get it. I tried to assist them by helping to tie my own arm. A correction officer came over, tapped on my hand to indicate that he also saw the vein and attempted to help the nurse locate the vein.
17. The death squad leader advised me that we were going to take another break and again told me to relax.

18. At that point I became very upset. I began to cry because I was in pain and my arms were swelling. The nurses were placing needles in areas that were already bruised and swollen. I requested that they stop the process, and I requested to speak with my attorney.
19. The death squad leader asked me to sit up so that the blood would flow more freely. After that, the head nurse, an Asian woman, came into the room.
20. The head nurse, attempted to access veins in my right ankle. The head nurse requested for someone to "give her a twenty" and someone handed her a needle. During this attempt the needle hit my bone and was very painful. I screamed. At the same time the head nurse was attempting to access a vein in the lower part of my left leg, the male nurse was simultaneously attempting to access a vein in my right ankle. After these failed attempts, the head nurse took the needle and left the room.
21. The male nurse made another attempt to access veins twice in my right hands. It appeared as though they had given up on the left arm because at that point it was bruised and swollen. The level of pain was at its maximum. I had been poked at least 18 times in multiple areas all in an attempt to give me drugs that would take my life.
22. The death squad leader again told me to relax. There was conversation between the correction officers about how they could see the veins right there.
23. After a while, Director Terry Collins came in the room and told me that they were going to discontinue the execution. Director Collins indicated that he appreciated my cooperation and noted my attempts to help the team. He also expressed his confidence in his execution team and their professionalism. Director Collins advised me that they would call Governor Strickland and advise the Governor of the situation.
24. After the nurses and Director Collins left, the correction officers asked if I would like some coffee and a cigarette. I was still on the bed with the lights down.
25. About a half hour later my attorney, Adele Shank, came and told me that the Governor had issued a reprieve for a week. I told Attorney Shank about my pain and showed her the areas of my bruising.
26. After Attorney Shank left, correction officials moved me to the hospital.
27. The next morning, my arms started to show further evidence of bruising and swelling. Every cite on my arm where an attempt was made showed visible bruising and swelling. Some of the bruising on my hands and ankle have disappeared and some of the swelling went away the next evening.
28. To this day, my arms have large visible bruises, and there is swelling in my arms. The multiple cites where the nurses attempted to access my veins continue to hurt.

29. Correction officials made the decision to keep me housed at SOCF during the week reprieve. During this time, I am constantly watched by the execution crew and the correction officers.
30. Waiting to be executed again is anguishing. It is very stressful to think about the fact that the State of Ohio intends to cause me the same physical pain next week.
31. I am constantly reminded of the fact that next week I will have to undergo the same torture that the State of Ohio exacted on me on Tuesday, September 15, 2009 because there has been no change to Ohio's execution protocol, and there has been no change to my veins.

Further Affiant Sayeth Naught

Romell Broom #187-343
ROMELL BROOM

Sworn to, affirmed and subscribed in my presence this 17th day of September, 2009.

Marcia Dukes
NOTARY PUBLIC

My Commission Expires: 11-5-2013



MARCIA DUKES
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 11-5-2013