404+ PROVABLE FALSE STATEMENTS CONVICTED MICHAEL GOODWIN¹

That truly amazing volume of false statements <u>by prosecutors</u> and their witnesses is absolutely correct and is absolutely provable.

Michael Goodwin would not be convicted without these PROVABLE LIES!

This wrongful conviction has the most provable perjuries/false testimonies/false prosecution closing arguments and opening statements of any case we have been able to find published in the U.S. It also has the most BRADY violations (suppression of evidence that would have supported innocence, hidden by prosecutors), over 250, of any case we've been able to find. These <u>must</u> be produced.

Further, it has the greatest number of witness statements that evidence proves the government has for trial witnesses that the government has suppressed; over 311. These were needed for cross-examination, and per Penal Code §1054.1 (f) must be provided.

When all the errors that evidence proves are added in, including those noted above, there are 1000+ different errors that <u>require reversal of the conviction</u>. Many of those are prosecution felonies.

To finalize our proof of the **404 false statements/perjuries**, we need, and ironclad law rules that the government must produce, the suppressed BRADY evidence, the witness statements, and other evidence. See CATLIN v. Spr. Ct. (2011) So Cal. 4th, 300, 306.

However, we now have evidence to prove enough of the following allegations to give prima facie proof that supports our entire claim of an <u>intentional false conviction:</u>

PERJURIES/FALSE TESTIMONIES/PROSECUTION FALSE CLOSING ARGUMENTS & OPENING STATEMENTS² IN LOS ANGELES, AT THE TRIAL:

- (11) ELEVEN Prosecutor false testimonies in offers-of-proof/solemn representations to the judge/ the law rules these are at least false testimony, and most probably perjuries.³
- (16) Sixteen Los Angeles trial perjuries by lead investigator, Mark Lillienfeld.
- $1\ Goodwin's\ conviction\ must\ be\ reversed\ for\ just\ one\ of\ these\ that\ affected\ the\ verdict;\ Penal\ Code\ \S 1473\ (b)(1).$
- 2 We may sometimes shorten this "string" to the more accurate "LIES".
- 3 HOLLOWAY v. ARKANSAS (1978) 98 S. Ct. 1173, 1174, 1178. Also, the prosecutor's Oaths of Office, Government Code 3108.

- (24) TWENTY-FOUR Los Angeles trial perjuries by the acknowledged "#1 source of case information to the D.A.", 19 RT 6939, Dolores Cordell, the victims' attorney. Evidence proves she led a looting of over \$2,000,000 from Goodwin.
- (12) TWELVE perjuries by the financial expert who had worked on the case for the District Attorney for five (5) years, Karen Kingdon.
- (6) SIX perjuries by two other District Attorney (D.A.) "experts", as designated by the Judge, as were Kingdon and Cordell, above, and two D.A. investigators in addition to Lillienfeld.
- (8) EIGHT perjuries/instances of false testimony by lay witnesses.
- (77) <u>SEVENTY-SEVEN absolutely provable perjuries/instances of false testimony at just the Los Angeles trial</u>, plus the following D.A. bad acts:
- (26) <u>TWENTY-SIX</u>, as are detailed on the next page, at the Los Angeles preliminary hearing, additional prosecutor offers-of-proof that were perjuries and more perjuries/false testimonies by the D.A.'s own experts and/or their lay witnesses.
- (36) THIRTY-SIX false closing arguments at the trial. The prosecutors/ official "oaths of office" that they sign, Government Code 3108, call these perjuries although many courts "let the prosecutors slide". However, since evidence proves that the vast majority of them had no evidentiary support on-the-record (nor is any available; they are provable totally false and intentionally fabricated). Legions of law rule these are illegal false testimony by prosecutors and require reversal of the conviction.
- (28) TWENTY-EIGHT false opening statements to which GENERALLY the same "rules" apply as apply to closing arguments above.

These Total 167 perjuries and/or instances of false testimony that clearly occurred in the Los Angeles proceedings. Plus;

146 perjuries, <u>absolutely provable as intentional/knowing</u> by lead investigator, Det. Mark Lillienfeld, in the five affidavits he gave, that we have, in Orange County, 2001, but supported the Los Angeles case, such as the line-up ID, wiretap and search warrants.

A TOTAL OF 313 PERJURIES/FALSE STATEMENTS contributed to the Los Angeles conviction, plus 91 more perjuries/false testimonies in Orange County. We don't yet have the Los Angeles arrest affidavit. The affidavits we have average 29 perjuries per affidavit by lead investigator Lillienfeld.

SPECIFICS OF PERJURIES/FALSE TESTIMONIES AT THE LOS ANGELES PRELIMINARY HEARINGS:

(8) EIGHT in offers-or-proof by the prosecutors.

TEN by the "#1 source of case information to the D.A.", Dolores Cordell, in addition to her 24 at

the Los Angeles trial and 20 to the 2001 Grand Jury. Yes, EVIDENCE PROVES AT LEAST 54 KNOWING

PERJURIES BY CORDELL, THE D.A.'S MOST IMPORTANT WITNESS⁴.

(4) FOUR additional by D.A. financial expert, Karen Kingdon.

(4) FOUR additional by lay witnesses.

THESE TOTAL TWENTY-SIX (26) at the Los Angeles preliminary hearing. These are included in the

current total.

(10)

AT THE ORANGE COUNTY PRELIMINARY HEARING; 54 more perjuries:

(4) FOUR in offers-of-proof by a different prosecutor.

(38)THIRTY-EIGHT by lead investigator Lillienfeld.

(12)TWELVE by lay witnesses.

AT THE ORANGE COUNTY GRAND JURY IN 2001:

(20)TWENTY + by Dolores Cordell, again, acknowledged "#1 source of case information to the

prosecution", 19 RT 6939, similar bp 032369.

(17) SEVENTEEN in the March 29, 2001 opening statement by the D.A. to the Grand Jury.

NOTE: We haven't plotted out and listed all the perjuries/instances of false testimony and/or false

arguments to the Grand Jury by the prosecutor in the later Grand Jury, July 5, 2001. We don't have the

total transcript for all witnesses, the closing, etc. Also, there are many more false testimony than are

listed here. These are just those we can prove.

146 Lillienfeld affidavit perjuries, included in total;

(17) SEVENTEEN in the Orange County arrest affidavit.

NOTE: We don't have the L.A. arrest affidavit.

4 Evidence actually proves many more perjuries and frauds by Cordell. We are waiting to detail those until we

obtain her over three dozen suppressed witness statements and her suppressed 80 boxes of files.

- (49) FORTY-NINE in the search affidavit.
- (15) FIFTEEN <u>each</u> in the <u>two</u> line-up affidavits.
- **(50)** FIFTY in the wiretap affidavit.

NOTE: Lillienfeld's affidavits average 29 perjuries each. At least four (4) affidavits, that evidence proves exist, are suppressed. Those are the Los Angeles arrest affidavit plus those confirmed at, BATES pages (bps) 000679-81, 000694, 026859, and 025346-7.

False prosecutor arguments/statements including perjuries in other Orange County proceedings aren't counted. We don't have transcripts. There are dozens more perjuries/false arguments/false statements in those. There are also dozens, probably over 50, false police reports. <u>Each</u> of those that is material (most provably are) is a Penal Code §118.1 felony by Lillienfeld.

In addition to the 404 plus perjuries already provable to obtain the conviction, plus the estimated 100 more perjuries by Lillienfeld in his four + suppressed affidavits, and 50+ false police reports, the Attorney General materially lied 30+ times in their appeal opposition.

That will certainly eventually total as 500+ perjuries or lies.

There are also thirty (30) outrageous acts of bias and/or misconduct, some of it apparently criminal by Judge Teri Schwartz, and/or gross incompetence by her. The law requires reversal of the conviction just for one of these. If you wish to see these, ask to see our summary and/or our detailed pleading with evidence.

End

⁵ I also know there were Lillienfeld affidavits to A) Monitor my L.A. County jail cell, and B) Monitor my jail visits. Those are also suppressed.