

Michael F. Goodwin, F69095, in pro-per
R.J.D., B-9-147L
480 Alta Rd., San Diego, CA 92179

Informal Request.
2 weeks no copies
delayed this.

THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

MICHAEL F. GOODWIN,

Petitioner

Vs.

Respondent,

No.

Spr. Ct. GA052683, Cal. Ct. App
B197574, Cal. S225061
Federal cv-09156-JFW (SS)

L.A.D.A. JACKIE LACEY & RESPONSIBLE
DIC MS. REIF, PLUS APPROPRIATE OTHERS,
E.G. INVOLVED DDAS SUCH AS THOSE WHO
ARE RESPONSIBLE FOR BRADY/DISCOVERY
COMPLIANCE, AND/OR THE CALIFORNIA A.G.
XAVIER BECERRA, ALL REPRESENTING THE
PEOPLE OF THE STATE OF CALIFORNIA,
THE REAL PARTY IN INTEREST.

REQUEST FOR MATERIALS TO
WHICH LAW ENTITLES ME FOR
FILE RECONSTRUCTION¹ AND/OR
IF I'VE NEVER YET RECEIVED
THEM? I'M ENTITLED TO ALL
MATERIALS REQUIRED BY LAW,
INCLUDING THOSE WHICH ARE
SUMMARIZED IN EXHIBIT ONE.
JUDGE SCHWARTZ RULED I
"QUALIFIED-HAD COMPLIED
WITH THE REQUIREMENTS OF
PC § 1054.9" TO RECEIVE
THESE, EXHIBIT TWO.

- IN RE MY HABEAS CORPUS -

I've often requested these. However, since A) some mail has
been returned from your office, B) I've not received at least one
Order from the Court, C) the Court has ruled to disregard some
of my filings (which included discovery requests), D) admittedly
my pleadings are complex and voluminous, and E) law is absolute
that I am entitled to these now, I repeat my request.

I cannot reasonably reply to your response, due 4.4.19, unless
I have at least crucial items within what is required, official
D.A. discovery, the Arrest Affidavit, & my statements which are
required without limit per Penal Code § 1054.1(b)³, all complete,
in order, and legible. With those we can soon justly resolve this.

Please provide those. You've had all the enclosed evidence.

- 1) In re STEELE (2004) 32 C4th 682, 688, 691-2, since this is an LWOP sentence.
 - 2) Penal Codes §§ 141, 1054.1 & .9, BRADY v. MARYLAND & it's progeny, THE JENCKS ACT.
 - 3) People v. JACKSON (2005) 129 CA4th 129, 169, some evidence of them in exhibit 3.
- If I cannot successfully resolve the proceedings with what you otherwise provide,
I may eventually need my many relevant statements from my computer LASD seized,
& my 100s of statements/checks relevant to motive in Bankruptcy files you have.
My statements & BRADY mtl's the DA has re the "SURETY", cp12-12 will end this fast.

I am not clear whether the Court's Order requires you to provide the materials law requires you to provide at the time you respond, or only to respond in a brief about them.

Thus in an abundance of caution this request is separate and in addition to whatever is required by the Court's 12.11.18 Order.

As previously plead, although I feel I may be able to adequately reply with just the materials cited on page 1, if I ascertain that law supports a Motion for Dismissal if all required materials are not provided I reserve that right.

Also as previously plead, for me to have the "reasonable access" assured by PC § 1054.9 in my circumstances I cannot handle a "dump" I must have any production identified re which request it is in response to, and what it is clearly labeled please.

That is one of the reasons I've repeatedly offered to make your immediate job easier, since the 3 items requested on page 1 will be reasonably easy to identify & work with in my limited space.

Even if you were to add the required nondisclosed statements by testifying/witnesses, required by PC § 1054.1(f) and other authority, those should be easy for you to identify as a group for me⁴

Again, I have hopes we are both merely working towards the honest administration of Justice and an expeditious resolution under the law and true facts no matter where the chips may fall/whoever prevails.

Re my Motion for Leave mailed 3.18.19, I've determined that I have sufficient issues with Lillienfeld in this case. We can ignore the Johnson case. Please allow me to defend.

4) Those, are even the most material ones which I've identified in previous pleadings, e.g. those for Michael Goodwin date 3/27/19 Allison Triarsi, John Williams, the Stevens, Dolores Cordell, Jeff Coyne, Wilma Johnson & Claudette Friedinger, particularly their taped statements, CT 592, will assuredly allow us to resolve this justly, rapidly, transparently, finally. As I've plead since 2011, discovery "errors" plagued virtually all my habeas claims.

DECLARATION IN SUPPORT OF HABEAS CORPUS

1. I Michael Goodwin declare that the following, unless otherwise noted, is of my own personal knowledge, & I would testify truthfully thereto under oath.
 2. I swear to all statements made by me in the attached writing, under penalty of perjury, & to my belief in the accuracy/correctness of enclosed exhibits.
 3. In addition to the issues already in the enclosed writing, I swear:
 - A. Evidence proves over 100 material perjuries by det. Lillienfeld. These are Penal Code 118/125 felonies, the majority of them intentional & prejudicial.
 - B. Evidence proves three dozen+ outright lies to the Judge & Jury by (DDA) Alan Jackson, most of them intentional & material. 12+ in offers-of-proof.
 - C. One dozen of Jackson's lies in "B" above show sufficient complexity & are multi-layered enough in planning to qualify as true FRAUDS ON THE COURT.
 - D. Evidence proves Jackson knowingly suborned perjury 30+ material times from D.A. experts Karen Kingdon, Jeffrey Coyne, Phillip Bartinetti and Dolores Cordell. B, C & D are all FELONY CRIMES violating Pen C §§ 118, 127 & 182.
 - E. Evidence & Govt. Code § 3108 prove DDA Dixon told 24 trial perjuries 42 times.
 - F. Evidence proves I was in great part convicted because the D.A. claimed I refused to pay Mickey a \$794,000. judgment debt / killed him to avoid paying.¹ <
 - G. Suppressed evidence; that evidence proves the D.A. has, proves I paid exactly as the law required, including \$2,000,000 more than I was obligated to pay, BUT THAT OTHERS, MICKEY'S OWN PEOPLE, STOLE PLUNDERED & SQUANDERED \$2,000,000+. I have evidence supporting this. Suppressed evidence is stronger,
 4. I was essentially cleared in the Thompson murders after a reported 600 witness interviews,² 450 of which, 75%, have illegally "disappeared." HOW? <
 5. On no new evidence, I was charged on 12/13/01 for the Thompson murders, just 7 days after I opened litigation to begin exposing Collene Campbell's felonies.
 6. 12 years after trial & after 100+ Motions/Requests to obtain them I still don't have A) the full trial record, B) D.A. official discovery, C) my trial attorney's trial file, or D) 100+ BRADY mtls I proved exist, nor 300+ trial witness statements.
 7. I've studied RICO law. I feel I have evidence proving a RICO CRIMINAL CONSPIRACY.³ <
 8. Since I was charged I've not seen A) all my required statements, B) the complete LA Arrest Affidavit, & C) I last saw complete D.A. official discovery 12 years ago.
- I declare to all herein under penalty of perjury, under the laws of the State of Calif. Executed on 3/27/19 in SAN DIEGO, CA.

2.4.19

- 1) See the Judge's ruling and/or offers-of-proof at 10 RT 4053 Michael Goodwin 7 RT 3006, 18 RT & D.A. argument 23 RT 8765, 6 RT 2741. much more.
- 2) Dozens of these missing statements have enough BRADY MTL TO dismiss the case. A top level L.A.S.D. report at bp 025388 confirmed NO evidence connected me to the crime. 13 years later I was charged on 12/13/01 on the very same "evidence," due solely to political pressure, w/13+ material PERJURIES in the 1st arrest warrant affidavit, several "whoppers" THESE ARE ALL 100% PROVABLE. Call me on it!
- 3) Led by the ex #1 & 2 heads of LADA MAJOR CRIMES, & a high ranking LASD detective.

CP3

THIS EXHIBIT IS A TWO PAGE SUMMARY OF OVER 200 SUPPRESSED BRADY MATERIALS WHICH EVIDENCE WE HAVE PROVES THE PROSECUTION HAS. YOU WILL SEE THEY ARE GROUPED BY SUBJECT FOR MOST OF THE MATERIALS.

WE RECOGNIZE THAT THIS STAGGERING NUMBER IS HARD TO FATHOM. WE GUARANTEE WE CAN PROVE THOSE DOCUMENTS EXISTED AND THAT FOR THE VAST MAJORITY OF THEM THE PROSECUTION HAS THEM.

THIS SUMMARY LIST ADDRESSES THE 25 EXHIBIT, 1000± PAGE BRADY AND OTHER SUPPRESSED EVIDENCE PLEADING PETITIONER FILED WITH JUDGE SCHWARTZ, THE L.A.D.A. & THE ATTORNEY GENERAL IN JUNE, 2014. (An earlier version was filed in 2011, a later one in 2016)

WE HAVE IDENTIFIED DOZENS, IF NOT OVER 50 MORE, POSSIBLY 100 MORE PIECES OF SUPPRESSED EVIDENCE THE GOVERNMENT HAS OR SHOULD HAVE, SINCE THE JUNE 2014 PLEADING. WE MEAN THERE, EVIDENCE WHICH IS REQUIRED TO BE DISCOVERED BY BRADY OR OTHER LAW.

FOR EXAMPLE, WE HAVE IDENTIFIED EVIDENCE WE HAVE WHICH PROVES OVER 300 CONFIRMED INTERVIEWS FOR WITNESSES ON THE D.A. TRIAL LIST, AND/OR WHO TESTIFIED, FOR WHICH NO STATEMENT HAS BEEN DISCOVERED. <1

PC § 1054.1(f) REQUIRES THAT ALL THOSE BE DISCOVERED, ALSO JENCKS.

I FEEL THE PROBLEM OF THE STAGGERING VOLUME OF SUPPRESSED EVIDENCE MAY BE THIS. THE L.A.D.A, ANXIOUS TO PROSECUTE, LISTENED TO THE COMPLAINING WITNESSES & FAILED TO CHECK THINGS OUT THEMSELVES. <2

EXHIBIT

- 1) The DA has my 60 pg list, alphabetized by witness, listing each confirmed interview for which the statement is suppressed, & the evidence proving the statement occurred.
- 2) Mickey Thompson's sister, political heavyweight & law enforcement insider Collene Campbell & her lawyer Dolores Cordell. Evidence proves that between the two of them they STOLE, LOOTED, & SQUANDERED \$2,250,000+ in cash & assets from Goodwin's Bankruptcies. Evidence also proves 54+ material perjuries between them.

- I SWEAR EVIDENCE PROVES THIS WAS REPEATEDLY FILED WITH THE D.A - CP4

Evidence proves that over 280 pieces of materially beneficial evidence, plus over 300 trial witness statements are suppressed.

The government can be proven to have these, and law is clear that they should have produced them for trial and must produce now.

1. There are 60+ individual pieces or groups of "other suspect" evidence suppressed as detailed in the first 51 pages of the June, 2014 DISCOVERY REQUEST filed with the Spr. Ct./prosecution.¹
2. There are 100+ individual pieces or groups of suppressed motive/financial impact evidence detailed in page 52+ of that filing.¹
3. There are 275+ individual pieces or groups of suppressed evidence specifically detailed in exhibit 1 of that filing, 169 pages.¹

ALL OR MOST OF THE SUPPRESSED EVIDENCE DETAILED HERE IS BENEFICIAL, OR AT LEAST WE HAVE SUBSTANTIAL INDICATION THAT IT WILL BE. SOME WILL BE REPETITIVE, BUT WE DON'T KNOW "BEST EVIDENCE" UNTIL WE SEE IT.

4. There are 84 individual pieces/groups of suppressed evidence that will "probably" be beneficial (exculpatory/impeaching) in exhibit 2 to that filing. All exhibits referenced here are in that filing.
5. There are 57 individual pieces/groups of suppressed evidence that should be scrutinized for beneficial evidence listed in exh. 3
6. Exhibit 4 lists 70+ pieces of crime scene/escape route which must be scrutinized by someone knowledgeable and honest² for beneficial evidence. The same scrutiny is needed for those below.
7. Exh. 5 lists 90+ pieces/groups of suppressed "pistol" evidence.³
8. Exh. 6 lists 15 pieces/groups of suppressed "fled" evidence.

1) Some of these "groups" of evidence have dozens of pieces of evidence that are or may be beneficial, some have over 100 pieces.

2) Evidence proves that the prosecutors are neither of these.

3) More than a dozen of these will be BRADY. CP5

9. Exhibit 7 lists over 311 trial witness¹ statements which law absolutely requires must be produced now since they weren't, as required by law, produced for trial.

We've identified that more than 100 (one-hundred) of these suppressed statements will be beneficial. Thus, BRADY and its progeny require production of them, in addition to PC § 1054.1(f).

Please also recognize that the Penal Code, and authority which interprets it are clear and firm that any statements written or adopted by these witnesses re: the issues addressed and/or relevant to the trial must be produced.

This means, for example, that the hundreds of pages of legal pleadings created and/or "adopted" (e.g. signed, or billed for) by witnesses such as Cordell, Coyne, and Bartinetti related to these issues, including transcripts where they spoke are discoverable

And, all of most of the 204 documents that trial witness Collene Campbell had on her computer about the murders as of 11/5/90, bp 001134, and all on her computer since then must be produced now. In addition to these needing to be produced because they are "statements of the witness" per PC § 1054.(f), any beneficial evidence, material or not,² must be produced since Campbell qualifies as "assisting the prosecution," and the D.A. must produce any beneficial evidence she is aware of or has.

10. Exhs. 8-9-10 list over 90 issues/items which must be scrutinized for beneficial evidence by someone knowledgeable and honest.

Exhibits 11 thru 25 list thousands of documents which must be scrutinized for beneficial evidence. I've identified key files³

1) We define "trial witnesses" as all on the D.A. list, plus all who testified.
2) People v. BOWLES (2011) 198 CA 4th 318, 129 CR 3d 290, 296, citing BARNETT v. Spr. Ct. (2010) 50 Cal. 4th 890, 901.

3) More than 50 documents in just exhibits 17 > 24 are absolutely BRADY.

DECLARATION

I Michael Goodwin do hereby declare that the following matters are of ~~my own personal knowledge, and if required I could and would testify truth-~~ fully thereto in a Court of law, sworn to under penalty of perjury.

1. I am not guilty of any involvement in the Mickey Thompson murders.
2. I have evidence in hand proving I was intentionally framed in a massive, extremely complex Penal Code § 182 FELONY CONSPIRACY TO OBSTRUCT JUSTICE.
3. Evidence conclusively proves the two major "complaining witnesses", Mickey Thompson's sister, Collene Campbell, & her lawyer Dolores Cordell STOLE & PLUNDERED, ILLEGALLY \$2,000,000⁺ from entities associated with me.
4. Evidence conclusively shows a clear cause & effect "ramping up" of criminal investigations of me immediately following the times I made efforts to expose the crimes in #3, & other crimes by Campbell & Cordell. For example, I was arrested just 7 days after I caused civil Bankruptcy fraud litigation to be opened against a Campbell run company, THE MICKEY THOMPSON ENTERTAINMENT GROUP (MTEG). That arrest was for the 13½ year old Mickey Thompson murders, on the very same evidence they had access to for the prior 12½ years.
5. I have subsequently won the Appeal on the civil fraud litigation, from the Ninth Circuit, a victory worth ten to perhaps forty million dollars if I had been free to pursue it. This is why Campbell-Cordell need to keep me in.
6. I swear all my statements in the enclosed are 100% true & correct, as well as the assertions/accusations I make below can be proven 100% correct.
7. I've sent irrefutable evidence to the L.A.D.A. & Judge Schwartz proving dozens of lies under oath, violating govt. code § 3108 by DDAs Jackson & Dixon (Dixon, as I understand it was actually the Assistant L.A. District Attorney).
8. I swear evidence proves more than 70 separate material lies by Jackson & Dixon, although many lies are on the same subject. I have those listed, as I do the allegations for all my assertions/accusations herein.

9. There exists a Federal Court Order in my habeas exhibit 3 which rules/conclusively proves that the Bankruptcy fraud crimes which the L.A.D.A. prosecutors and their expert witnesses stated/supported with 55+ total accusations against me in the trial & preliminary hearing **DID NOT EVEN OCCUR, AND THUS THAT I WAS NOT GUILTY OF THEM.**

10. The Jury apparently believed these accusations of \$1,730,000 in Bankruptcy fraud crimes allegedly committed by me, based on the attached page 51 from the Jury foreman's post-trial sworn declaration, 8 CT 2082. If you want the whole dec, ask

11. Evidence conclusively proves that L.A.D.A. prosecutors Patrick Dixon, again apparently the Assistant L.A.D.A. soon after, & Alan Jackson¹, were fully aware that I had been cleared of those crimes, and that, in fact, the proffered crimes simply never occurred. Yet they suborned perjury on them.

12. **"#1 L.A.D.A. MOST IMPORTANT WITNESS...SHE LAID OUT THE FINANCIAL CASE,"** Dolores Cordell, 19 RT 6939*, (Collene Campbell's lawyer who STOLE the \$1,650,000 JGA/Whitehawk asset from our federally protected, ERISA qualified pension by frauds, perjuries & lies) had fabricated the alleged Bankruptcy frauds against us & provided the false information to authorities. *(attached, page 50)

She also falsely testified in support of some of these fabricated crimes/fraudulent transfers which were alleged, in her murder trial testimony.

13. Evidence conclusively proves 34+ material perjuries by Cordell in the L.A. murder proceedings, and 20+ more to the Grand Jury. Evidence also proves about a half a dozen material perjuries by her partner Phillip Bartinetti, at least two "whoppers" by Bartinetti, & many "whoppers" by Cordell.

14. There are 100+ each BRADY materials & trial witnesses' statements which must be produced per PC § 1054.1(f) but that are suppressed, evidence proves this.

I declare under penalty of perjury under California & United States law that all the above is true & correct. Executed 3/29/19 in San Diego, CA.

1) Alan Jackson was a highly lauded prosecutor who was runner-up to L.A.D.A. Jackie Lacey in the 2012 election, a very close runner-up. Michael Goodwin, F69095, B-9-147L CP8
480 Alta Rd., San Diego, CA. 92179

SHOULD YOU WANT EITHER THE ENTIRE 5 PAGE DECLARATION, OR JUST A
FRESH, NOT ANNOTATED COPY OF THIS PAGE JUST ASK, elegan3@AOL.com,
REQUESTING "MATTHEWS DECLARATION" & WE WILL IMMEDIATELY SEND IT.
THE WHOLE DECLARATION IS EXCEEDINGLY EXCULPATORY. 002082
THE FULL DECLARATION WAS OFTEN FILED WITH THE D.A.

PAGE 51

1 We discussed during the deliberations the character
2 evidence that had been offered against Michael Goodwin.
3 The tone of the deliberation in this regard was that
4 Michael Goodwin lacked a "moral compass." The evidence
5 that was offered by certain witnesses clearly painted
6 Mickey Thompson as a good and honorable fellow and Michael
7 Goodwin as just the opposite. The bad character of
8 Michael Goodwin along with his ability to take everything
9 he did (including other criminal activity) to an extreme
10 level was very evident from the testimony of these
11 witnesses. The jurors went over all of this in the
12 deliberation room and we could not escape the reality
13 that, coupled with his overtly stated hatred of Mickey
14 Thompson, this guy was the kind of guy who was capable of
15 coordinating this event.

16
17
18
19 I declare the above to be true and correct to the best of
20 my knowledge under penalty of perjury.

21
22 Executed this 5th Day of February, 2007 in Los
23 Angeles, California.

24
25 Mark Matthews
26 Declarant
27 Mark Matthews

28 1) NOTE THAT MY "BAD CHARACTER" AT LINE 7 WAS THE RESULT OF THE
29 ACCUSATIONS OF OTHER CRIMINAL ACTIVITY, LINE 9.

30 THE ONLY "OTHER CRIMINAL ACTIVITY" BEYOND THE SPECIOUS
31 PROSECUTION ARGUMENTS RE: THE MURDERS, WERE THE 55 TIMES IN
32 TRIAL AND THE PRELIM THE PROSECUTORS AND THEIR WITNESSES LIED
33 I HAD COMMITTED BANKRUPTCY FRAUDS TO CHEAT THE COURT & MICKEY. CP10
34 THE 1994 FEDERAL COURT ORDER ¹ PROVES ALL 55 OF THOSE WERE

INTENTIONAL LIES IN D.A. ARGUMENT & PERJURIES BY WITNESSES. <
1) Evidence in DA discovery proves the DA had & hid this Order. It is in habeas exh 3.

Q AND I ASKED YOU SPECIFICALLY ABOUT DELORES CORDELL AND WHAT INFORMATION YOU RECEIVED FROM HER.

DO YOU RECALL WHAT, IF ANY, INFORMATION YOU RECEIVED FROM HER?

A WHEN I WAS ASSIGNED THE CASE THERE WAS -- THE INVESTIGATOR HAD BLACK BINDERS¹ IN HIS OFFICE THAT HE SAID WERE FROM THE LAW FIRM CLARK AND TREVITHICK. I DON'T KNOW HOW THEY -- I DON'T KNOW HOW THEY OBTAINED THEM.

Q SO DID YOU WRITE THEN -- DID YOU WRITE, QUOTE, "NUMBER ONE SOURCE FOR INFO² SLASH COLLENE CAMPBELL'S ATTORNEY" AFTER THE PHRASE "DELORES CORDELL WORKS THERE"?

A YES, I DID.²

Q IS THAT BECAUSE SHE WAS YOUR NUMBER ONE SOURCE FOR INFO?

A NO. THAT'S -- WELL, IN A SENSE, YES. THAT'S REFERRING TO DELORES CORDELL, IN THEIR DEALINGS BACK AND FORTH, HAD SPELLED OUT QUITE CLEARLY WHAT SHE FELT THE -- WHERE MONEY AND ASSETS HAD GONE AND WHERE THEY HAD COME FROM. SO FROM A FINANCIAL POINT OF VIEW, THAT HAD BEEN SPELLED OUT VERY CLEARLY.

Q OKAY. I WANT TO GO BACK TO THE FRASER YACHTS PURCHASE AGAIN.

WAS IT YOUR UNDERSTANDING FROM REVIEWING THE FILE THAT A 20,000-DOLLAR PERSONAL CHECK HAD BEEN SUBMITTED TO FRASER YACHTS BY DIANE GOODWIN AS SORT OF ERNEST MONEY OR GOOD FAITH -- A GOOD FAITH DEPOSIT AT A

- 1) THESE CLARK & TREVITHICK FILES WILL BE TRUE TREASURE TROVES OF BRADY/PC § 1054.1(f) MATERIALS. THESE ALONE WILL PROVE MORE THAN HALF OF "#1 D.A. WITNESS CORDELL'S" 34+ L.A. PROCEEDINGS, & 20+ MORE ORANGE COUNTY GRAND JURY, 8/22/01 MATERIAL PERJURIES.
- 2) THE PROSECUTION'S PROBLEMS WITH CORDELL ARE A) AS NOTED ABOVE, EVIDENCE PROVES 54+ A MATERIAL LIES-UNDER-OATH/PERJURIES BY HER, & B) SHE STOLE \$1,650,000 FROM OUR ERISA QUALIFIED/PROTECTED PENSION BY ADDITIONAL LIES-UNDER-OATH IN THE BANKRUPTCY.
- A) CORDELL PROVES SOME OF HER OWN PERJURIES IN HER GRAND JURY VS. HER OWN TRIAL TESTIMONY.

ONLY TRANSCRIPT PAGES RELEVANT TO THE ISSUE HEREIN ARE INCLUDED. FOR THE ENTIRE TRANSCRIPT, INCLUDING "FRESH" PAGES OF THIS ONE GO TO friendsofmichaelgoodwin.blogspot.com, UPPER LEFT CORNER, "TRIAL TRANSCRIPTS".

DISCOVER
CITES
CONFIRM
10+ STM
KINGDON
A D.A.
INVEST-
IGATOR A
TOOK FRO
CORDELL.
THE STM
ARE NOT
DISCLOSE

THEY MUST
BE
DISCOVER

1 COMPLIANCE WITH THE ORDERS THAT THE COURT HAS PREVIOUSLY
2 ISSUED.

PAGE
34

3 AND WHILE I DON'T THINK THAT THERE IS ANY
4 ONE PERSON AT FAULT FOR VIOLATING THE COURT'S ORDERS, I'M
5 CERTAINLY SYMPATHETIC AND I UNDERSTAND THE REASONS WHY THE
6 COURT'S ORDERS HAVEN'T BEEN COMPLIED WITH.

7 BUT I KNOW THAT MANY, MANY MONTHS AGO I
8 INFORMED MR. CAMACHO THAT THE COURT WOULD MAKE WHATEVER
9 ORDERS IT NEEDED TO MAKE TO GET THE DEPARTMENT OF
10 CORRECTIONS TO EITHER ACCEPT THE HUNDREDS OF BOXES¹ THAT > > >
11 THE DEFENSE HAS TO SEND TO MR. GOODWIN OR TO SHOW CAUSE
12 WHY. SO THAT'S WHERE THE COURT IS AT.

13 I DON'T WANT TO GO AND LITIGATE AN ISSUE
14 THAT DOESN'T REALLY NEED TO BE LITIGATED. BECAUSE WE ARE
15 NOT THERE YET.

16 I DO THINK MR. GOODWIN HAS MADE REASONABLE
17 EFFORTS, AND THEN SOME, TO GET THE DEFENSE -- THE PUBLIC
18 DEFENDER TO SEND THE HUNDREDS OF BOXES.² I DO BELIEVE HE
19 HAS. BUT I DON'T KNOW THAT THAT'S THE STANDARD BECAUSE
20 YOU HAVE IT AND YOU HAVEN'T PROVIDE IT.² AND THE ONLY
21 REASON YOU HAVEN'T PROVIDED IT IS RESOURCES. AND
22 SO I DON'T THINK THAT TRANSLATES TO REASONABLE EFFORTS.

23 MR. HANDLER: I THINK -- IF I CAN INTERRUPT. I
24 DID EXCHANGE E-MAILS WITH MS. SARIS. AND AS I RECALL, SHE
25 INDICATED THAT YEARS AGO SHE INDICATED A WILLINGNESS TO
26 IMMEDIATELY HAVE HIS FILE SHIPPED TO ANYWHERE HE COULD
27 HAVE IT SHIPPED. AND THAT HE COULDN'T IDENTIFY AN OUTER
28 INSTITUTION LOCATION WHERE IT SHOULD GO.

5.25.16
HEARING

I FINALL
GOT THES
ON CD,
BUT...SE
FOOTNOTE

<

<

CP11

- 1) UNLIKE I MUST HAVE THEM THEY ARE A) NOT SEARCHABLE, B) NOT PRINTABLE, C) NOT IN ANY SEMBLANCE OF ORDER. IN FACT THEY ARE HORRIBLY SCRAMBLED & INCOMPLETE. ALTHOUGH I'VE WITH GREAT DIFFICULTY FOUND VERY VALUABLE MATERIAL I HAVE NO WAY TO USE IT.
- 2) JUDGE SCHWARTZ RULED THAT I'D COMPLIED W/PC § 1054.9 BUT I STILL DON'T HAVE 100s, OF BRADY MILS, NONDISCLOSED STATEMENTS & MANY OTHER MILS I DESERVE AS OF 1/1/19.

THERE ARE MANY MORE BRADY MATERIALS & OTHER DISCOVERABLE MATERIALS SUCH AS DEFENDANT'S STATEMENTS & WITNESS STATEMENTS REQUIRED BY PC § 1054.1(f) THAN I HAVE HIGHLIGHTED. THAT IS BECAUSE THE ONES HIGHLIGHTED AT PAGES 29-30-31 1 < (JGA/WHITEHAWK AGREEMENTS) & 42-43-44, BANKRUPTCY ACCOUNTING, MICKEY THOMPSON 1 < MURDER FILE & OTHER BRADY MATERIALS WILL ALLOW US TO DECIMATE THE D.A. CASE.

DOCUMENT PRODUCTION FROM THE ORANGE COUNTY
DISTRICT ATTORNEY'S OFFICE

> MANY OF THE DOCUMENTS ON THIS & THE NEXT PAGE ARE FROM THE CRUCIAL SURETY FILE <

1. Addendum to Agreement between Diane S. Goodwin and Michael F. Goodwin concerning the Los Arcos Limited \$135,000 investment and the swap of community property for the 84 Honda. This was introduced as an Exhibit in the Surety Hearing. 100001. BRADY SURETY

2. Declaration of Michael F. Goodwin in Support of Defendant's Motion for Stay of Execution. 100003-100030. NOTE: THIS DEPOSITION IS NOT COMPLETE AND THE PAGES ARE NOT CONSECUTIVELY NUMBERED. SURETY

DEFENDANT'S STATEMENT, ALSO BRADY.
3. Security Agreement of April 12, 1986 securing William Butcher against Stadium Motorsports Corp. for the repayment of \$200,000. 100031-100034.

4. UCC-1 TO William Butcher from Stadium Motorsports Corp. 100035-100036.

5. Secured Note \$200,000 payable to William Butcher from Stadium Motorsports Corp. dated April 12, 1986. 100037. THIS NOTE IS INCOMPLETE IT IS NOT SIGNED.

6. Continuing with the Deposition of Michael Frank Goodwin. 100038-100043. SURETY?
DEFENDANT'S STATEMENT.

7. Signature page of a Promissory Note. 100044.

8. Security Agreement between Stadium Motorsports and Butcher as the secured party dated April 18, 1986 to secure a payment of \$125,000. 100045-100048.

9. UCC-1 Financing Statement dated April 18, 1986 between Stadium Motorsports Corp. and William Butcher as the secured party. 100049-100050

10. Secured Promissory Note in the amount of \$175,000 dated May 14, 1986 between Stadium Motorsports Corp. and William Butcher. 100051-100052.

11. Security Agreement dated May 14, 1986 between Stadium Motorsports Corp. and William Butcher. 100053-100056.

12. Security Agreement dated April 14, 1986 between Stadium Motorsports in favor of William Butcher. 100057-100060.

13. Secured Note dated April 18, 1986 in the amount of

EM-2

1

1) The pages referenced in the heading are not included here. I previously filed them with the Court & D.A.

CP12

+ - EVIDENCE I FILED WITH THE COURT & D.A. PROVES THE D.A. HAS THESE FILES -

\$125,000 between Stadium Motorsports and William Butcher. 100061-100062.

14. Continuing at page 76 of the August 26th Deposition of Michael Frank Goodwin. 100063-100073.

DEFENDANT'S STATEMENT

SURETY

15. Agreement between Diane Goodwin and Michael Goodwin dated June 16, 1985. This is stamped for identification 8/26/86, looks like it is an Exhibit to a Deposition. 100074.

WHOSE?

BRADY

16. A document which looks to be a second page of some type of Promissory Note, it is signed by Michael Goodwin on behalf of Stadium Motorsports Corp. but it is incomplete. 100075-100076. NOTE: THERE IS A REFERENCE THAT SAYS REFER ATTACHED FINANCIAL STATEMENT.

17. Another unidentified document that has 3 banks listed on it looks like it is part of a credit application asking for references. 100077.

18. It is a sheet marked across the top "Assets" at the bottom it says "Total Liabilities and Stockholders Equity 648871. 100078.

19. Deposition of Diane Catherine Goodwin dated September 24, 1986. NOTE: THIS DEPOSITION IS INCOMPLETE IT IS NOT CONSECUTIVELY NUMBERED AND THERE IS NO SIGNATURE PAGE. 100079-100090.

BRADY

20. Declaration of Qualifications of Diane Goodwin as Personal Surety 1. 100091-100093. EXTREMELY EXCULPATORY, SURETY

BRADY <

21. Diane Goodwin Personal Balance Sheets Sole and Separate Property 1986. 100094-100097.

22. A Proof of Service page signed Joanne Post, August 5, 1987 and it says on August 5, 1986 I served the foregoing document described as Declaration of Diane Goodwin. 100098.

23. Examination of Diane Goodwin on behalf of Judgment Creditor Mickey Thompson October 29, 1986. 100099-100125. NOTE: THIS DEPOSITION IS NOT COMPLETE.

BRADY

24. Declaration of Diane Goodwin regarding Community Property Assets and Liabilities. This document is marked #2 for ID date 9/24/86. 100126-100130.

BRADY

25. Response to Supplemental Points and Authorities and Objecting to undertaking Supplemental Declaration of Michael & Diane Goodwin. 100131-100150.

BRADY?

DEFENDANT'S STATEMENT

>> THERE ARE DEFENDANT'S STATEMENTS >>
& BRADY MATERIALS IN THE SURETY 2
FILE RE MOTIVE WHICH COULD
RESOLVE THIS CASE JUSTLY AND
QUICKLY.

1) This document is in the crucially
exculpatory "Surety File" the D.A.
has & withheld. It will prove
conclusively I had the intent and
ability to pay Mickey before the
Bankruptcy but his lawyers said no,
bp 023792.

THERE ARE 35,000+ PAGES OF NONDISCLOSED D.A. DOCUMENTS, HUNDREDS OF BRADY MTLs, WITHIN OUR 262 PAGE ATTORNEY PREPARED INVENTORY OF SUPPRESSED PROSECUTION MATERIALS.

65. Form 2866 Certificate of Official Records signed Susan J. Hernandez, dated August 11, 1993. Attached is a corporate income tax return for Stadium Motorsports Corp for 1985. 200299-200312.

66. Form 2866, Certificate of Official Records. Attached is a corporate income tax return for Supercross Inc. for year ending December 31, 1986. 200313-200319.

PINK ENVELOPE THAT SAYS TO BE OPENED BY ADDRESSEE ONLY CHRISTINE E. CLEVELAND, ASSISTANT U.S. ATTORNEY. 200320.

Contents of Envelope

ALMOST ALL OF THE DOCUMENTS HEREIN, E.G. THESE TAX DOCUMENTS, CAN BE PROVEN TO HAVE COME FROM THE BANKRUPTCY FILES.

67. Letter addressed to Christine E. Cleveland from Michael Quinn, District Director. 1 pg. 200321.

68. NOTE: Missing 200322-200323.

69. Letter, "pursuant to order of the U.S.D.C. 10/10/93" from the Internal Revenue Service to A. Rascon, dated October 2, 1993. Document has a paper clip on it but missing whatever was attached to the paper clip. 200324.

THE IRS MATERIALS INCLUDE DOZENS OF BRADY MATERIALS.

70. Letter dated 1/2/93 from IRS to Cleveland. 200325.

71. Form 1040 U.S. 1988 Individual income tax return, which has been stapled and unstapled prior to today, of Michael and Diane Goodwin. 200326-200333.

Note: copy

72. Form 1040 1988 Income tax return for Michael & Diane Goodwin. 200334-200344.

73. Deposition of Michael Frank Goodwin taken on August 26, 1986, in case #C513615. 200345-200508.

163 PAGES

74. Deposition of Diane Catherine Seidel taken on September 24, 1986 in case #C513615. 200509-200600.

91 PAGES

75. Examination of Michael F. Goodwin taken in case #C513615. 200601-200728.

127 PAGES

76. Deposition of Diane Seidel Goodwin taken on February 6, 1987 in Chapter 11 case #SA 86-05280 JR. 200729-200750.

21 PAGES

77. Deposition of Diane Goodwin taken February 4, 1988 in case # SA 86-06166 JR. 200751-200818.

68 PAGES

78. Volume one of a 2004 Examination of Diane Goodwin

- 1) THE MAJORITY OF THE DOCUMENTS ON THIS PAGE & THE NEXT CAME FROM THE BANKRUPTCIES.
- 2) EVIDENCE PROVES THE U.S. ATTORNEY "ASSISTED IN THE MURDER INVESTIGATION" AND AS SUCH THEIR FILES ARE DISCOVERABLE FOR OTHERWISE DISCOVERABLE MATERIALS. THERE WILL BE DOZENS IF NOT 100+ BRADY MATERIALS IN THE U.S. ATTORNEY FILES.

~~EVIDENCE PROVES THE D.A. HAS THESE FILES AND THIS LIST~~

CP14

ITEMS # 73, PRIOR PAGE, THROUGH 79, BELOW, 758 PAGES OF EVIDENCE,
ARE SATURATED WITH EVIDENCE RE: CORE MURDER TRIAL ISSUES, E.G. "DID
GOODWIN PAY MICKEY AS LAW REQUIRED?" & WERE THERE ILLEGAL TRANSFERS?

taken February 19, 1987. 200819-201043.

224 PAGES¹ <

79. Volume two of a 2004 Examination of Diane Seidel 64 PAGES¹ <
Goodwin taken February 18, 1988. 201050-201114.

WHITE BOX MARKED GOODWIN BANKS ON TWO SIDES FORM AND CONTENTS ON
THE SIDE OF BOX HAS WHITE PIECE OF PAPER THAT SAYS GOODWIN

Contents of Box

80. Fax from Norman A. Matthews dated June 22, 1989, 17² <
pgs addressed to Mid Cities National Bank, Attention Darrell Van
Es. 20115-201131. THIS SHOULD INCLUDE EVIDENCE SUPPORTING THAT THE BANKRUPTCY
"PROFESSIONALS" LOOTED THE BANKRUPTCY CASH & ASSETS.
Not Copied

81. An envelope from Colin Cooper, Certified Public
Accountant to Jeffrey Arnold. ARNOLD IS A D.A. INVESTIGATOR. HE TESTIFIED TO
SEIZING THE BANKRUPTCY FILES, 5/5/93 GRAND JURY.

82. Declaration of Colin Cooper dated June 29, 1987
behind which is a 1986 U.S. Partnership return of income for Laguna 2 <
Surf.

83. 1985 U.S. Partnership Return of Income for Laguna 2 <
Surf.

84. 1984 U.S. Partnership Return of Income for Laguna 2 <
Surf.

85. 1986 Supercross Inc. U.S. Corporate Income Tax 2 <
Return.

86. 1983 U.S. Corporate Income Tax Stadium Motorsports 2 <
Corp.

87. 1983 U.S. Income Tax Returns Stadium Motorsports 2 <
Corp.

88. 1984 U.S. Income Tax Returns Stadium Motorsports 2 <
Corp.

89. 1984 U.S. Partnership Return of Income for High 2 <
Timber Limited -- this document is unbound and consists of about
16 pages.

90. 1986 High Timber Limited U.S. Partnership Return of 2 <
Income.

91. 1985 U.S. Partnership Return of Income for High 2 <
Timber Limited.

- 1) FROM THE PRIOR PAGE & THIS PAGE THERE ARE 290 PAGES OF "MICHAEL GOODWIN
STATEMENTS" REQUIRED TO BE DISCOVERED BY PEN C § 1054.1(b) & 468 PAGES OF
WITNESS DIANE SEIDEL GOODWIN STATEMENTS REQUIRED BY PEN C § 1054.1(f). THEY CP15
WILL ALSO INCLUDE MANY DOZENS OF PAGES INCLUDING MATERIAL BRADY MATERIALS.
2) EVERY DOCUMENT ON THIS PAGE ORIGINATED FROM THE BANKRUPTCIES, & ALL ARE RELEVANT
IN THE MURDER CASE.