

DECLARATION RE: SUPPRESSED EVIDENCE NEEDED TO CORRECT THIS TRAVESTY OF INJUSTICE

I Michael Goodwin declare that the following is of my own personal knowledge, and if required I could and would testify truthfully thereto in Court.

1. I am the defendant in GA052683, Appeal B197574. I've been imprisoned on this wrongful conviction for 13½ years, 7½ years since the January, 2007 conviction.

2. I SWEAR UNDER PENALTY OF PERJURY THAT I CAN PROVE I AM NOT GUILTY OF THESE CHARGES/THIS CRIME. I MERELY NEED THE SUPPRESSED EVIDENCE I HAVE PROVEN EXISTS, (In a 6/9/14 filing with the Superior Court), AND THE EVIDENCE OF MINE THAT IS HELD BY MY PUBLIC DEFENDER. We've made 21 BRADY/discovery requests, 13 pre, 8 post trial.

3. Prosecutor Jackson lied at trial that all evidence had been produced.

4. EVIDENCE IRREFUTABLY PROVES far more than 311 statements are suppressed for trial witnesses<sup>1</sup> for 100% confirmed interviews or writings/tapings the witness did.

5. EVIDENCE IRREFUTABLY PROVES far more than 253 BRADY VIOLATIONS.<sup>2</sup>

6. EVIDENCE IRREFUTABLY PROVES 404 perjuries/lies/instances of false testimony including but not limited to the following: (this list isn't all-inclusive)<sup>3</sup>

A. 205 knowing felony perjuries by lead investigator det. Mark Lillienfeld.

B. 84 Los Angeles trial and preliminary hearing perjuries/instances of false testimony by D.A. (District Attorney) witnesses, in addition to Lillienfeld's.

C. 68 of those lies were by the D.A.'s experts and other investigators besides Lillienfeld.

D. 34 were by the D.A.'s acknowledged "#1 source of case information...she laid out the financial case," 19 RT 6939, and 16 more were by the ex-D.A. employee, CPA-financial expert, Karen Kingdon, who worked on the case for 5 years and testified that she had relied on Cordell for much of her financial information.

E. Of the 60 lies (this is shorter than perjuries/instances of false testimony, and is perfectly descriptive) told by Cordell and Kingdon, more than 40 were relevant to financial allegations by the prosecution.

F. 24+ SWORN perjuries by Deputy District Attorneys (DDAs) Jackson and Dixon.<sup>4</sup>

7. Because of #6 D-E above, the following by trial Judge Schwartz is critical.

"THIS WHOLE PROSECUTION IS PREMISED ON ONE THING AND THAT IS THAT THE MOTIVE FOR THE MURDERS WAS BECAUSE OF THE BUSINESS DISPUTE THAT EXISTED, AND THE LENGTHS TO WHICH MR. GOODWIN WOULD GO TO AVOID HAVING TO SATISFY THE JUDGMENT AND BASICALLY PAYING UP" 10 RT 4053 on the trial record.<sup>A</sup>

8. Suppressed evidence will prove I did all I was permitted by law to do to assure that Thompson was paid. I had been in Bankruptcy for 16 months before the murders, and FEDERAL LAW WAS ABSOLUTE THAT I WAS PROHIBITED FROM PAYING THOMPSON

DIRECT. The Bankruptcy trustee had to pay Thompson.

1) Footnotes are "endnotes".

9. Re: paying the \$794,000 Thompson judgment debt<sup>5</sup>, which the Judge ruled was the case, prior page line 30 and again at 18 RT 6751 similarly, suppressed evidence WE CAN PROVE THE PROSECUTION HAS will prove each of the following conclusively:

A. Again, that I did all that I was permitted by Bankruptcy law to do to assure Thompson's payment. Firm law prohibited me from paying Thompson direct.<sup>6</sup> But,

B. i) prior to being forced to file Bankruptcy I offered to "post" a personal surety that eventually generated \$5,000,000 cash, to bond payment to Thompson.

ii) Within this surety three other individuals with millions of dollars in net worth agreed to join me as being responsible to pay the debt.

iii) The Thompson lawyers rejected my surety offer.

iv) Later the Thompson lawyers admitted in a filed pleading that is in the D.A.'s official discovery that "Had we accepted the surety Thompson would have been paid in full," accurately paraphrased from bates page 023792:17.

v) This did not get presented at trial.

C. I repeatedly offered 100% payment plans in Bankruptcy via my lawyers, spending over \$70,000 to do so. The Thompson lawyers always rejected them.

D. I repeatedly offered to guarantee any shortfall in what the Bankruptcy trustee may pay Thompson via outside assets beyond what the Bankruptcy and/or Thompson had any legal right to, e.g. my wife's separate property and my post-filing bankruptcy earnings. Thompson's lawyers repeatedly refused my sincere offers.

E. I had deposited and/or caused to be deposited over \$823,000 into the Bankruptcy (BK) trust account from which Thompson was to be paid his \$794,000 judgment about 3 months before the murders. I could not touch those funds.

F. I begged the Bankruptcy trustee to allow Thompson to be paid, writings prove.

G. The Bankruptcy trustee who held the \$823,000+, Jeffrey Coyne, demanded a \$50,000 bribe to do his job and comply with the law. I refused vehemently.<sup>1</sup>

H. Coyne was used as an expert against me at trial by the D.A. and Coyne committed multiple PROVABLE MATERIAL PERJURIES against me.

I. Just before the unforeseen murders I had agreed to a detailed contract to insure Thompson's payment if the Bankruptcies didn't pay 100%.

J. Thompson's lawyers found at the last minute that me agreeing to this was not permitted by Bankruptcy law. So the settlement was scuttled by them.

K. After the murders Thompson's lawyers found a way that it was legal for me to agree to the very same agreement that i'd agreed to before the murders.

L. I signed that agreement just 13 days after the murders. The Court approved it.

M. I continued to, in writing, offer big assets to insure Thompson's payment.

N. Even years later I contacted his lawyers to try to negotiate payment.

1) It is obvious Coyne then went to Thompson and got his bribe there.

10. Suppressed evidence will also CONCLUSIVELY PROVE THAT THE ONLY REASON THOMPSON WASN'T PAID IN FULL BY THE ABOUT \$3,000,000 THAT WAS HANDLED BY THE CORRUPT (PROVABLY SO) BANKRUPTCY TRUSTEES WAS THAT THE TRUSTEES, THEIR ATTORNEYS, AND THEIR ACCOUNTANTS CRIMINALLY LOOTED OVER \$2,200,000 OF THAT \$3,000,000 BY CHARGING OUTRAGEOUS AND UNECESSARY FEES AND COSTS TO THE BANKRUPTCY.<sup>7</sup>

11. EVIDENCE WILL ALSO CONCLUSIVELY PROVE that Dolores Cordell, Thompson's own lawyer, led the criminal looting of the Bankruptcies. She was SPECIAL COUNSEL TO THE PERSONAL BANKRUPTCY TRUSTEE. She was appointed to this position only because she signed an affidavit in which she committed material perjury. I have the docket number of her perjurious affidavit but it is suppressed.<sup>8</sup>

12. As sworn to earlier herein, Cordell was acknowledged at trial by the D.A. financial expert Karen Kingdon, as the "#1 source of case information...she laid out the financial case", 19 RT 6939 in the trial record, similar at bp 032369.

13. But evidence conclusively proves Cordell caused Thompson not to be paid in full, and then committed 34 material perjuries at trial pointing to me as the reason Thompson didn't get paid. She also committed 20+ perjuries at the Grand Jury.<sup>9</sup>

14. In addition to the perjuries/instances of false testimony already detailed on page item #6, the DDAs committed 64 false closing arguments and/or opening statements, all material I feel. Many were misleadingly re: "Goodwin wouldn't pay".

15. At least 49 of those false arguments/statements had no support on the record. Many other arguments/statements also had no support on the record.<sup>10</sup>

16. The DDAs materially misstated the law numerous times, particularly about the critical issue that "Goodwin should have paid Thompson". It would have been a felony crime for me to pay him direct. The Jury was grossly mislead.<sup>11</sup>

17. Evidence also conclusively proves the following, although these are not all inclusive of the DDAs material misconduct and/or other trial errors:

A. FORGERY of at least two pieces of materially exculpatory/impeaching discovery to eliminate their favorable value. I have these ready to show the Court.

B. A major threat to a key defense witness and an offer of a bribe to her if she would falsely implicate me. She testified to the former,\* and gave us a sworn affidavit to the former and the latter, by det. Lillienfeld. \*(3/29/01 Grnd. Jury)

C. Fabrication/falsification of at least one trial exhibit, a crucial one, exh 51, the "composite" of the alleged killers. It was a provable fraud on the Court.

18. Amongst the most material suppressed evidence is that the Thompsons were IN FACT KILLED BY A WHITE SHOOTER OR SHOOTERS. There are more than a dozen pieces of evidence that we know the D.A. has proving white killer(s) that are suppressed.<sup>12</sup>

19. I was convicted on D.A. claims of black killers; evidence didn't support it.

1 20. I have only about 800 pages of the 47,000 pages of official discovery  
2 (8 CT 2166). I've seen 37,223 pages of it and alphabetically indexed issues that I  
3 felt would be key, but my trial lawyer has refused to arrange to get the balance to  
4 me for 7½ years now. She now claims that the prison won't accept the materials.

5 21. I have just one trial exhibit, #51, to the best of my knowledge, and i'm  
6 quite knowledgeable about the materials I have. That evidence, trial exhibits #51,  
7 is provably fabricated/falsified. I have that briefed and evidenced re: the fraud.

8 And, the evidence from which it was allegedly "built" is suppressed. I have  
9 that evidence identified and i've requested it repeatedly.

10 22. I have most, not all, of the Reporter's and Court Reporter's transcripts,  
11 (RT and CT), but am missing crucial portions of them. I have none of the very  
12 critical "sealed" hearing transcripts, nor the sealed documents re: the defense  
13 attempt to have the L.A.D.A. recused for violating the attorney-client relationship.

14 23. One of the key issues in my habeas corpus will be pushing for the recusal  
15 which the law rules should have been done for trial because of prosecutor crimes.

16 24. The vast majority, quite possibly all, of the evidence/exhibits that are  
17 sealed was seized from my home legal office when I was arrested. I created the  
18 vast majority of those materials for my attorney to use in my defense. Many more  
19 pieces of what I believe are in the sealed materials are my letters to my lawyers  
20 and/or their letters to me. They were clearly attorney-client privileged.

21 25. Because i've seen all or most of the sealed evidence, and it originally  
22 sourced from me, there is no legal reason I can fathom to keep them from me. I yet  
23 again request and respectfully demand that the Court order that I get them.

24 26. I have diligently tried, in fact exhaustively tried since my conviction  
25 over 7 years ago to get A) my materials being held by the public defender, B) the  
26 case file, and C) the suppressed evidence. I've been rebuffed and/or ignored.

27 27. I've tried to obtain these materials that the law says I deserve so that  
28 I can expeditiously file my habeas corpus. The law says that it is the preferred  
29 method to file it so it can be considered at the same time as the direct appeal,  
30 which is still pending 7½ years after my conviction\*. It is at the 2nd District of  
31 the State system. \*(Although I recognize this is not often done this way.)

32 It would also be more efficient Judicially to file my habeas corpus to be  
33 considered with my direct appeal since so much is not on the record that proves  
34 that due process was repeatedly violated/denied, that the trial was a SHAM.

35 I reasonably estimate that 80% of the crucial exculpatory/impeaching evidence  
36 was not introduced at trial, either being suppressed or newly discovered. And,  
37 "JUSTICE DELAYED IS JUSTICE DENIED", People v. LYNCH 50 Cal 4th 693, 719 (2010).

1 28. Investigators seized 118 boxes of evidence from my well marked as attorney-  
2 client privileged confidential home law office upon my arrest. They also took my  
3 computer. Boxes taken confirmed at bp 025164 in discovery. They only returned 114  
4 boxes of those files, bp 032236. I don't know if they returned my computer.

5 29. I have not been able to access even the 114 boxes of files they returned  
6 in the 13½ years since my arrest. My trial attorney has not given them to me.

7 30. My boxes of files and my computer have hundreds of pages of exculpatory/  
8 impeaching evidence in them, as does my computer. I need and request both the boxes  
9 and a print off of all relevant evidence on the computer.

10 31. While I was in the Los Angeles County jail awaiting trial, in summer 2006,  
11 deputies and at least one Sgt. "raided" my cell and took/didn't return thousands  
12 of pages of evidence, including several doz pages that were attorney-client priv-  
13 iledged, and hundreds of pages of exculpatory/impeaching evidence.

14 They did this with no legal authorization that was shown to me or that i've  
15 been able to learn about. The seizure was videotaped. My lawyer refused to ask for it.

16 32. There was some extremely critical exculpatory/impeaching evidence that I  
17 can identify that I have no idea where or if I can replace it. One group of evidence  
18 like this were faxes to and from one of my lawyers in late January-early February  
19 1988 which stated from me "Do whatever you must to settle with Thompson if  
20 possible. If necessary give him everything i've got," or words to that effect.

21 33. Similarly in my home files were old style 5¼" computer discs that had  
22 documents on them that proved that I intended to pay Thompson including cash flows  
23 with allowances for his payment. Some of these show up in discovery, so it is  
24 clear that the investigators/prosecutors accessed what was on these 5¼" discs.

25 However, the key one in discovery off of the 5¼" disc had "blocking paper"  
26 laid over the key portion of it before it was copied, the portion that showed I  
27 intended to pay Thompson. That is at bp 023776-8. Whoever copied it was sloppy  
28 and laid the paper crooked. It is easy to see that it was modified before copying,  
29 and they also missed a key phrase on the assumptions page that stated my full  
30 intent to pay Thompson in full if/when I lost the final appeal. That is, to pay  
31 him via the Bankruptcy since that was the only way it was permitted until, after  
32 the murders, the Thompson lawyers found a way for me to legally guarantee him!

33 34. Amongst the suppressed documents are documents by third party either  
34 unbiased or even hostile witnesses that state things like, "Goodwin had enough  
35 money to pay all debt including Thompson 100%" or words to that effect, docs. #  
36 82 and 83 in the SA-86-06166-JR Bankruptcy & a deposition from my Bankruptcy lawyer  
37 "Mike intended to pay Thompson and all creditors," and other exculpatory evidence.

1) Although it was illegal for me to pay him direct, his lawyers finally found a  
legal method for me to guarantee any shortfall the Bankruptcy trustee didn't pay.

1 35. EVIDENCE I CAN PROVIDE CONCLUSIVELY PROVES extensive outside political  
2 interference in this case, some of it which seems blatantly illegal to me, a layman.

3 The original lead investigator, Michael Griggs, even wrote memos, 5 CT 1187 to  
4 appx. 1250 which included statements that Colleen Campbell, a powerful local  
5 politician, and the victims' sister, was obstructing the investigation via political  
6 pressure. He stressed that she wanted him to focus on me and to essentially ignore  
7 suspects that had more evidence to link them, e.g. Joey Hunter.

8 36. Griggs confirmed that she had lied to him about what witnesses said, and  
9 that even her husband Gary told Griggs she lied about the case, if I recall it  
10 correctly. See 5 CT 1209, 1213, 1217. EVIDENCE PROVES SHE LIED MATERIALLY AT TRIAL.

11 37. It very strongly appears that the reason Griggs retired early to get off  
12 the case was that Campbell caused so much political interference with the case. I  
13 believe he may have said as much in his report, and/or other documents he wrote.

14 38. I opened multi-million dollar (perhaps \$25,000,000+) litigation against  
15 Mickey Thompson Entertainment Group (MTEG) in a hearing on or about December 10th,  
16 2001. Colleen Campbell had run/managed MTEG for about seven years prior to that.  
17 She was a substantial shareholder, as was Mickey's son Danny. They filed Bankruptcy.

18 Campbell's husband Gary was listed as President of MTEG in the time period for  
19 which I sued and plead well supported felony criminal Bankruptcy frauds.

20 I won that litigation years later when the Ninth Circuit BAP (Bankruptcy  
21 Appellate Panel) ruled in my favor and reversed a lower Court decision.

22 Although they stopped short of recommending the MTEG principals, Colleen and  
23 Gary Campbell, Danny Thompson and others, including their lawyers, for criminal  
24 prosecution, the BAP confirmed that they had committed frauds that would have  
25 gotten them convicted and sent to prison for many years had authorities been made  
26 aware of them before the statutes of limitations had lapsed. They also faced fines.

27 39. I had started on the trail of trying to uncover this criminal fraud re:  
28 MTEG's multi-million dollar value SUPERCROSS assets years before:

29 40. Campbell got wind of that and in about 1992 or 1993 she persuaded people  
30 in law enforcement to put pressure on me. THIS IS COMPLETELY PROVABLE. I've done  
31 a detailed cause and effect chart showing A) when i'd do what to investigate and/or  
32 expose the criminal and civil frauds, multi-million dollar ones, by the Campbell  
33 led group, B) then what she and/or attorneys she was aligned with would do to stir  
34 up law enforcement to come after me, and then C) what law enforcement would do,  
35 most of it obviously contrived/fabricated. The cause-effect is crystal-clear.

36 41. This culminated in me being charged with the murders just 3± days after I  
37 caused the fraud litigation on Campbell's company to be initiated in December 2001.

42. I was charged out of jurisdiction in Orange County for the Los Angeles murders, on the very same evidence on which the correct jurisdiction, Los Angeles, had repeatedly rejected the prosecution because of lack of evidence. The fact that the prosecution was repeatedly rejected in Los Angeles was testified to the Grand Jury by lead investigator Lillienfeld on 7/24/01 at about page 885.

43. I was charged in Orange County, which the Fourth District Appeal Court later ruled had no jurisdiction whatsoever to charge me, by Colleen Campbell's ex-personal attorney, confirmed business associate, close friend, and political crony Anthony Rackauckas Jr., at the time and now the O.C.D.A., provably corrupt.

44. Evidence strongly indicates, but does not yet conclusively prove, that Campbell was Rackauckas' de facto, but hidden, fund raising manager for his election to D.A. campaign. "Telldates" substantiating this are damning.

45. Evidence conclusively proves that Rackauckas has extensive exculpatory evidence that is suppressed. It is detailed in our instant discovery/BRADY motion at exhibit four (4) page 10. Evidence also proves about Rackauckas:

- A. That he knew, absolutely that a pistol I owned was impossible to be a murder weapon for the Thompson's via his own ballistics test that has his initials on it, bp 032780. The murder guns had "6 twist" barrels. Mine was a "5 twist".
- B. Yet just 10 days later he authorized as the lead item to put me in a line-up that was constitutionally flawed, both far too suggestive, and unreliable, that my pistol was a possible/probable murder weapon.
- C. He similarly allowed that in the arrest and search warrants four months later.
- D. Evidence proves he also knew that the evidence was nearly conclusive, if not 100% conclusive that Mickey was killed first in the attack.
- E. Yet he authorized to charge me, the false, contrived allegation that Trudy was killed first and Mickey was forced to watch. This was postured in the case allegation that it was because I hated Mickey so much I wanted him to suffer.

This was a huge part of the case, extremely prejudicial.

We have substantial evidence proving Mickey was killed first, and we have absolute confirmation that Rackauckas has and hid additional evidence proving conclusively that Mickey was killed first. A tape confirming this is suppressed.

- F. Rackauckas also authorized me to be charged alleging that the Thompson's were killed by two black shooters who escaped on bicycles.
- G. Evidence is irrefutable that the Thompsons were killed by the same WHITE shooter, e.g. see bp 000188, a 911 call transcript from an eyewitness, "I just saw a white guy shoot Trudy Thompson", and at trial, 16 RT 6063, the Sheriff ballistics expert testified that the same pistol killed Mickey. Ergo, the same shooter obviously killed them both.

H. Not one of the crime scene eyewitnesses maintained that they had seen either a black shooter, a black person, or a bicycle on the actual crime scene.

G. EVERY ONE OF THE FIVE ACTUAL CRIME SCENE EYEWITNESSES REPORTED A WHITE SHOOTER (bp 000188 and elsewhere) AND/OR WHITE SUSPECT ON THE CRIME SCENE, AND NO BICYCLES AT THE CRIME SCENE.

I. Even though there was NO evidence of a black shooter, Rackauckas' office alleged the killers were black, and the Los Angeles prosecutors continued with the falsehood, speculating, without admitting to the Jury that there was no evidence to support black shooters, that the shooters were blacks on bicycles.

J. This farce was instrumental in my provably wrongful conviction.

K. Even though we have dozens of pages of evidence of a white killer, and there is no evidence we've seen as to the race of the other suspect at the scene, evidence proves substantial additional suppressed evidence proving white shooter(s) that Rackauckas and the other prosecutors are still hiding.

L. In addition, Rackauckas authorized a false time that the shooting began be claimed by his prosecutors/investigators. Evidence proves this, and that it was intentionally done to implicate me with other provably bogus contrived evidence.

It will not be obvious as to why this could be so critical, and because of the extensive prosecutorial/investigatory misconduct we don't want to give the details, BUT I SWEAR UNDER PENALTY OF PERJURY HERE that the evidence is overwhelming, I feel conclusive, irrefutable, that the murders occurred at a time that the prosecution case vs. me was impossible to be anywhere near correct.

To elaborate on why we don't want to give the details up, evidence proves that prosecution team members have threatened witnesses to change their story, (we have a sworn declaration on that from a key defense witness), and have both destroyed exculpatory/impeaching evidence, and forged/fabricated evidence to make it inculpatory. Lillienfeld committed 205 material FELONY perjuries!

M. None of the above was detailed in the trial. Some of it is newly discovered evidence and much of it will be proven by suppressed evidence that we have identified and confirmed that the D.A. has, if they haven't destroyed it.

There are other serious and troubling anomalies/inconsistencies in the case.

46. My attorney represented to me that I am the only person in the history of the United States jurisprudence who was convicted of being the behind the scenes "kingpin" who hired killers when the killers were never identified or found.

Although I cannot verify either of these, she said it was also in the media.



47. The Los Angeles D.A. charged me after the Orange County holding order was dismissed, in June 2004. They charged me on LESS EVIDENCE than they had when they repeatedly rejected the prosecution for lack of evidence.

48. Evidence also proves that law enforcement had all the true evidence they had for trial within 11 months following the murders, by February 15, 1989.

That is 100% correct and provable via sworn testimony. No new real evidence came into the trial than what the prosecution had for 17 years before trial.

49. Including what we've already detailed at page one here, 301 felony perjuries<sup>1</sup> in these proceedings, evidence proves another 100+ perjuries and/or lies and false arguments/statements by prosecutors and their witnesses not detailed here, primarily in the Orange County proceedings. The dishonesty is mind boggling.

E.g. "#1 expert" for the D.A., Dolores Cordell, 19 RT 6939, committed 20+ material perjuries at the 2001 Grand Jury. She often testified to "facts" that 180° contradicted her testimony in Los Angeles where she perjured 54+ more times.

Had the defense had the suppressed evidence that i've detailed, with evidence supporting that it exists and the prosecution had it, plus where it "lived", the prosecution wouldn't have been able to get away with the perjuries/instances of false testimony/false arguments, offers-of-proof, and statements.

I UNEQUIVOCALLY GUARANTEE THAT THE SUPPRESSED EVIDENCE WILL PROVE ALL OF THE FOLLOWING:

- A. That I am not guilty of the allegations the prosecution made, none of them. And,
- B. The vast majority of the false statements/arguments/perjury/instances of false testimony will be proven as KNOWINGLY FALSE. And,
- C. That I was KNOWINGLY FRAMED by investigator Lillienfeld perjuries to establish bogus "probable cause", by forgery and fabrication as well as destruction of relevant evidence, and CRIMINAL SUBORATION OF MATERIAL PERJURY BY THE PROSECUTIONS JACKSON AND DIXON, PENAL CODE § 127 CRIMES.
- D. The prosecutors and investigators were GUILTY of a Penal Code § 182 (1) thru (5) FELONY CONSPIRACY TO OBSTRUCT JUSTICE AND FALSELY CONVICT.
- E. This will prove to be one of the largest, if not the largest case of prosecutorial/investigatory misconduct in the Ninth Circuit in decades, if not for the entire history of the Ninth Circuit.

50. I recognize that this level of frauds and deceptions by law enforcement is unfathomable, as are 311+ suppressed trial witness statements and 253+ BRADY violations. Evidence proves it all. Hold my feet to the fire. IT IS STUNNING.

1) Plus another 103+ non-perjury, non-criminal, false statements or false testimonies.

1 Although I will stop at the 50 issues with many subcategories of issues under  
2 many of them, the case problems go on and on. Just two more.

- 3 • Evidence proves more than two dozen serious abuses of discretion by trial Judge  
4 Teri Schwartz. These included her materially misstating what three witnesses had  
5 testified to as her sole reason for denying our extremely well founded Speedy  
6 Trial/Denial of Due process Due to Pre-Indictment delay that caused loss of  
7 exculpatory evidence and witnesses, hundreds of pieces, and a dozen witnesses.

8 She also failed in her sua sponte obligation to insure that correct Jury  
9 instructions were given. The Conspiracy instruction was unlawfully given since  
10 there was no evidence introduced, ..nor available that I was connected to any  
11 conspiracy to murder the Thompsons. She also left out key words that are  
12 required to be included in certain Jury instructions, e.g. "immediately" in the  
13 very prejudicial and unsupported "fled as consciousness of guilt" instruction.

14 Judge Schwartz failed to give the absolutely necessary Jury instruction  
15 that the law prohibited me from paying Thompson direct, and she failed to give  
16 three other necessary financial related Jury instructions, very prejudicial.

17 She also refused to allow us to present our evidence on the prime white  
18 suspect Joey Hunter, would not allow any evidence of other suspects, and she  
19 refused to allow us to introduce the compelling evidence that the murders were  
20 the result of a theft of \$250,000 in gold coins that evidence showed Thompson  
21 bought just before the murders and weren't found following the murders.

22 Every witness who reported suspects leaving the crime scene reported and/or  
23 testified that the escaping suspects had bags with them that resembled the  
24 bags that gold coins were delivered in at the time.

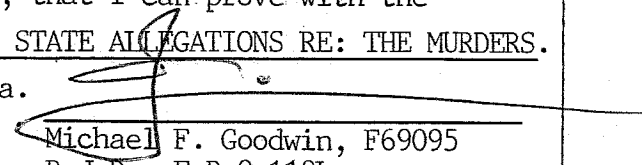
25 A bag that looked like gold coins were delivered in was photographed  
26 empty in the van in which Trudy was originally shot, 16 RT 6019-6020.<sup>1</sup>

- 27 • The harrassment of me goes on. The prisons often lose my legal mail, some pieces  
28 of it which had exculpatory evidence that is irreplaceable, and that they  
29 had refused to copy for me before I mailed it.
- 30 • There is much more, but I feel the above has "made the bar" of a false conviction.  
31 If you don't agree, please ask for my evidence and/or more explanation.

32 I SWEAR UNDER PENALTY OF PERJURY under the laws of the State of California that  
33 all of the above is true and correct, and again, that I can prove with the  
34 suppressed evidence that I am NOT GUILTY OF THE STATE ALLEGATIONS RE: THE MURDERS.

35 Signed 6/9/14 in San Diego County, California.

36 1) Thompson's safe was also damaged, and pry  
37 marks were found on a Thompson window. Other  
evidence supported a break-in, the gold theft.

  
Michael F. Goodwin, F69095  
R.J.D., F-B-9-118L  
480 Alta Rd. San Diego, CA. 92179

## ENDNOTES TO 6/1/14 DECLARATION

1. Page 1 line 12. We correctly define trial witnesses as the witnesses listed on the prosecution's pre-trial witnesses to possibly called for trial list(s) plus others who testified at trial. There were 134± "trial witnesses!"

Evidence proves 311+ statements for 100% confirmed interviews with these witnesses or statements they wrote or recorded are suppressed. Actually we are confident that when Penal Code § 1054.1(f) and THE JENCKS ACT, Title 18 § 3500 (see THOMPSON V. SPR. CT. (1997) 53 Cal App 4th 480, headnotes) are complied with there will be over 400 statements that we will find were suppressed in this long running RICO criminal conspiracy.

I am also confident that up to 200 (two hundred) of those will include exculpatory and/or impeaching information/evidence. For example, just D.A. expert Dolores Cordell, my antagonist Colleen Campbell's lawyer, will have in the neighborhood of 100 written statements that are suppressed and that are required to be produced by ironclad law, that will be favorable to me.

In addition to the law above requiring these statements be produced to the defense, United States Supreme Court law rules that all evidence on which an expert relied in developing the "opinions to which they testified" must be produced, U.S. v. NOBLES (1975) 422 U.S. 225, 239-241 and others.

So, BRADY, JENCKS, PC § 1054.1(f), NOBLES, and others require production of many or most of the suppressed statements. 1054.1(f) required production of all of them including any statements/writings the witness made related to this case.

Those include many pieces of exculpatory evidence that are suppressed, that the prosecution hopes we overlook like the license plate that Ron Stevens wrote down and kept for 13 years, per his testimony, Allison Triarsi's diary re: the murders, Karen Draguntan's notes to herself pre-trial, and very materially, the over 200 documents that Colleen Campbell had on her computer though just 20 months after the murders on 11/5/90, bp 001134, plus all she has re: the murders for the next 24 years until now.

Just as materially are the documents prepared and/or adopted by her lawyer Dolores Cordell, the acknowledged "#1 source of D.A. case information... she laid out the financial case," 19 RT 6939 on the trial record by an ex-D.A. employee who worked on my case for 5 years.

Cordell was SPECIAL COUNSEL TO THE PERSONAL BANKRUPTCY TRUSTEE, and as such prepared more than one hundred documents in the Bankruptcies that will include exculpatory and/or impeaching evidence/information.

I'm confident that the suppressed statements which must, by law, be produced, will decimate, truly eviscerate the government case, and prove that it was intentionally contrived in a long running Penal Code § 182 (1) thru (5) FELONY CONSPIRACY TO OBSTRUCT JUSTICE AND FALSELY CONVICT.

Evidence will prove that the participants in this criminal conspiracy will read like the who's who of Southern California politics and law enforcement. Included will be O.C.D.A. Anthony Rackauckas, his top prosecutors David Brent, Michael Jacobs and James Mulgrew, O.C.D.A. investigator Jeffrey Arnold, FBI Agent Randolph Easterling, Los Angeles prosecutors Patrick Dixon, at the time head of Major Crimes for the L.A.D.A., Alan Jackson, runner-up for the top dog L.A.D.A. position in 2012, and a "lauded star," det. Lillienfeld, and the kingpin, Colleen Campbell plus her lawyers Dolores Cordell & Phillip Bartinetti. I'm confident that others such as Ronald Durkin and Karen Kingdon will be added.

2. Page 1, line 13, re: 253+ BRADY VIOLATIONS.

For both the suppressed 311+ witness statements and the BRADY violations, there are statements and BRADY evidence suppressed for every witness who testified for the prosecution and also for many of the defense witnesses, e.g. Sandra Johnson and det. Lillienfeld.

The suppression is outrageous, particularly for the most prejudicial and/or most prejudicial witnesses. For example evidence proves more than 32 statements that are 100% confirmed as the government having, are missing for "#1 WITNESS" Dolores Cordell, 17 for Ron and Tonyia Stevens, 19 for Colleen Campbell, (probably many more for her since det. Lillienfeld confirmed twice that he spoke with her weekly; recall that she also hired at least 4 private investigators and had those 204 statements on her computer re: the murders over 24 years ago.)

There are 8 confirmed statements that are suppressed for expert Coyne, critical to the case. He was responsible for paying the Thompson debt from the \$823,000 I had deposited in his trust account 3 months before the murders.

He refused to pay Thompson and testified at trial to issues that made it appear that I had tried to avoid paying Thompson.

Suppressed evidence re: him will prove material perjuries by him, just like suppressed evidence will prove material perjuries for 13 other witnesses including every expert and investigator.

This suppressed evidence will prove 34+ perjuries by Dolores Cordell at trial and the preliminary hearing plus 20 or more to the 2001 Grand Jury, 19+ by prosecutors in offers-of-proof (yes, law rules those as felony perjuries), 16 for D.A. financial expert Karen Kingdon, A STUNNING 205 BY LEAD INVESTIGATOR MARK LILLIENFELD, including some where he contradicted his own other sworn statements, plus suppressed evidence will conclusively prove 64 MATERIAL FALSE CLOSING ARGUMENTS AND/OR OPENING STATEMENTS BY LOS ANGELES PROSECUTORS.

The perjuries/instances of false testimony, all material, go on and on. The only crime scene witness who testified, Allison Triarsi, can be proven to have materially lied 6+ times, which is amazing since she seemed so sincere, ex-police Captain Bill Wilson can be proven to have perjured at least twice. He lied/perjured about another issue, huge, but I doubt we can prove that. Again, 14 witnesses can be proven to have materially falsely testified.

Re: our claim of 253+ BRADY violations. I am intimately familiar with BRADY law and the facts of what we have and what the prosecution has but has suppressed. The requirements for a piece of evidence to be a BRADY violation are 1) The evidence at issue must be favorable to the accused, either because it is exculpatory, or because it is impeaching; 2) the evidence must have been suppressed by the State, either willfully or inadvertantly; and 3) prejudice must have ensued, STRICKLER V. GREENE (1999) 527 U.S. 263, 281-2 and others.

My 6/9/14 DISCOVERY REQUEST, 135 pages of pleadings±, along with the 25 exhibits attached to it detail far more than 253 BRADY violations. I recognize that this volume of suppressed evidence or witness statements is unbelievable.

I again SWEAR UNDER PENALTY OF PERJURY not only that all my claims are true, but also that with the suppressed evidence I can prove these claims. Sworn to and signed 6/9/14 in San Diego, California.

1) HOLLOWAY v. ARKANSAS (1978) 98 S. Ct. 1173, 1174, 1178, People v. MROCZKO (1983) 35 Cal 3d 86, 112, People v. MIRENDA (2009) 174 CA4th 1313, 1332.

Michael F. Goodwin

I will attempt to be more brief on the balance of the endnotes since I was so lengthy on the first two.

I hope and presume that via what I wrote in endnotes #1 and 2 that you see that I have substance to my claims, that I can back them up.

3. Now, endnote #3, page 1 line 15. What I listed below this footnote on page one are merely the perjuries/instances of false testimony, false closing arguments and/or opening statements, in short, PROVABLE LIES.

There are dozens of additional prosecutor/investigator bad acts, including crimes that violate one or more of the following criminal Penal Codes, §§ 115, 118, 125, 127, 132, 134, 141 and all of them combine into the aforementioned PC § 182 (1) thru (5) FELONY CONSPIRACY TO OBSTRUCT JUSTICE AND FALSELY CONVICT.

Some of the other unlawful acts by prosecutors/investigators are  
 1) actual forgery of evidence, 2) destruction of favorable evidence,  
 3) tampering with/modifying favorable evidence to eliminate the exculpatory/impeaching value, e.g. bps 023776-8, a sloppy job that gives them away,  
 4) fabrication of bogus inculpatory evidence.

5) Subornation of material perjury by the prosecutors, dozens of times. This will be proven by the suppressed evidence since "the individual prosecutor is charged with knowledge of all information (note by me, note "information", not simply the evidence) accumulated in the government investigation of the case", in re BROWN (1998) 17 Cal 4th 873, 879, a controlling case.

And, 6) evidence proves that det. Lillienfeld threatened a key defense witness to "put her up on murder charges" if she would not lie and falsely implicate me. She testified to a sanitized version of this to the 3/29/01 Orange County Grand Jury. And she gave us a declaration on it.

Because they committed so many provable criminal felonies; prosecutors, investigators and their witnesses can be proven to have committed over 300 perjuries and/or instances of false testimony, plus the evidence tampering, witness threats, false police reports, etc; it is a reasonable permissive inference that they committed other crimes of which we are not yet aware.

And based upon det. Lillienfeld and DDA Jackson's conspiracy at trial\* to cover up Lillienfeld's prior pistol perjuries, it is also reasonable to infer that they have and will commit other crimes and/or acts of misconduct to cover their earlier crimes. \*(Evidence we now have irrefutably proves this.)

Just what we can now prove makes this case one of, if not the worst case of government misconduct in the Ninth Circuit in decades.

I feel it is also reasonable to infer that some or much of the suppression of evidence is intentional. However, that is not required for it to be a BRADY violation.

4. Law rules that "solemn representations to the Judge by a lawyer are to be treated as though they were under oath", HOLLOWAY v. ARKANSAS (1978) 98 S. Ct. 1173, 1174, 1178, People v. MROCZKO (1983) 35 Cal 3d 86, 112, People v. MIRENDA (2009) 174 Cal App 4th 1313, 1332. Penal Code § 118 or 125 makes them felony perjury even if they were not intentional, & Govt. Code 3108 says they are perjury. That relates to the oaths of office they take.
- A) I recognize that non-intentional false testimonies are not criminal. But, per PC § 1473(b)(1) and authority they require that the conviction be reversed.

I didn't do a good job of being brief on page 13. I'll try harder here. Sorry.

5. Page 2 line 1, re: the \$794,000 judgment debt to Thompson. See pages 18-19.

The Thompson lawyers admitted in writing to two critical facts, 1) that they would have accepted \$500,000 as full payment. Dolores Cordell even wrote that "\$500,000 is more reasonable," inadvertently admitting that the \$794,000 was way out of proportion to the real damages, which in fact Thompson caused.

Because the damage is done to me and dozens of others, and so much exculpatory evidence has been lost due to the passage of time, it is not worth it to "beat the horse" again here, BUT I SWEAR TO YOU THAT I 100% COMPLIED WITH OUR CONTRACT WITH THOMPSON.

I lost the civil suit in 1986 that led to all of this pain for me, my family, friends and business associates based on a Judge ruling that I had failed to put up my 70% of the combined cash needs of the two companies. There is a contractual term that the Judge ignored that did not obligate me to put up any portion of Thompson's company's cash needs during the stipulated "recission period" that the contract proved we were in.

However, even going with the Judge's faulty interpretation of the contract, I put up and lost \$704,000 on the joint business arrangement, vs. \$234,000 by Thompson. This is proven by comparing my 1984 tax return with the official accounting of what Thompson lost.

But, that is water under the bridge. If however anyone wishes to really know the truth of this travesty that turned into a phony conviction and has lost me at least \$10,000,000 i'd enjoy giving the details and citing evidence.

For the murder conviction the key is that I did all that law permitted me to do to assure Thompson's payment. Please re-read page 2 in my declaration. B \*\*\*

6. Page 2, line 5, re: "Firm law prohibited me from paying Thompson"

Title 18 § 152 and the Bankruptcy code controls very strictly what a debtor can do in Bankruptcy particularly with his/her funds and payment to Bankruptcy creditors.

When a trustee is in control, which was the case in both of my Bankruptcies, only the trustee could pay Bankruptcy debt and it had to be done with Court approval.

Because this was the case, Judge Schwartz had a sua sponte obligation<sup>A</sup> to instruct the Jury of that fact. She did not, and she contributed to my bogus conviction by opining/ruling that the "Entire case is about the lengths to which Goodwin would go to avoid paying the Thompson judgment debt," 10 RT 4053, see page 1, line 30 herein, and for those of you who were served with the 6/9/14 DISCOVERY REQUEST see the last page in exhibit 1, a copy of the transcript.

So, essentially I was convicted for not committing a felony crime. I was convicted for following the law. Judge Schwartz BADLY ABUSED HER DISCRETION.

There were four other financially relevant Jury instructions that Judge Schwartz was obligated to give and she failed to do. If desired I can detail.

A) See People v. ARANDA (2012) 55 Cal 4th 342, 354, 145 Cal Rptr 855, 864, headnote 5. A Judge is required to know the law, WILLIAMS V. TAYLOR (2000) 529 U.S. 362, 393, 395.

\*\*\*B) I overlooked adding #2 of the Thompson lawyer admissions. At bp 023792 in discovery they admitted that had they accepted the surety offer I made Thompson would have been paid 100%. That is true. Since evidence is compelling that Thompson was really killed because he owed alot of money to bad people, Thompson's lawyers caused the murders.

7. Page 3 line 5 re: The unnecessary and outrageous trustee, attorney and accountant (hereafter T&As) fees that bled the Bankruptcy estate funds and kept Thompson and the other creditors from being paid in full.

The simple answer is that a maximum of \$150,000 of the T&As fees are what could be, by any stretch of the imagination, legitimate. And, even those were absurd since evidence conclusively proves that not only did the T&As have no benefit to the actual creditors, but they cost them several hundred thousand dollars out of what was available to pay them had the T&As not been involved.

I recognize that is hard to believe. However, my trial lawyer hired a Bankruptcy specialist who spent \$25,000 analyzing the Bankruptcy finances.

He stated, and I quote that "In the 20 years i've been analyzing Bankruptcy estates i've never seen one that there was so much misconduct in by the trustees, attorneys and accountants...it is unbelievable," accurately paraphrased (So I guess it isn't a quote, sorry, but it is accurate.)

In short again, Thompson's lawyer Cordell led a looting of the Bankruptcy estate that kept Thompson from being paid 100%. Then I was convicted for it.

There was actually about \$1,500,000 in total real debt between the personal and company bankruptcies. \$3,000,000 ran through the estates. So, even if the fees had gone to an absurd \$500,000, all debt would have been paid 100% with \$1,000,000 to spare that belonged to my wife's provably separate property, (sourced from a enforceable pre-marital agreement and an inheritance), and the pensions.

And, this was easily attainable with no litigation. I wrote the personal trustee's lawyer, Kirk Rense, in the summer of 1988 telling him that I had my wife Diane's approval to use her portion of the JGA asset to help pay the debts including Thompson. We gave him permission in writing to take that JGA income with no litigation costs, conditioned only on the trustee paying all legitimate secured debt, which included the money due by law to the pension.

But the trustees, attorneys and accountants had other ideas. They saw the \$2,000,000 cash from JGA and decided to loot it themselves via inflated fees and costs rather than let it go to the real creditors who deserved it.

The T&As then ran up another \$2,350,000 in unnecessary fees and costs taking the \$2,000,000 in JGA income that we had offered them with no litigation/fees/costs expended.

The result of this is not only that the real creditors got none of the \$2,000,000 in JGA income, but in addition hundreds of thousands of dollars that was initially available to them without any JGA income was taken by the T&As to pay the inflated fees that they spent taking the JGA income.

Yes it is that simple, 1) the T&As provably spent more in their own unnecessary fees and costs obtaining the JGA income than the income. And, they still committed multiple criminal FRAUDS ON THE COURT TO GET IT.

Plus 2) the real creditors would have been paid far more had the T&As never been involved. It provably cost the real creditors several hundred thousand dollars to have the T&As, led by Dolores Cordell, "helping them!"

I recognize this again is unfathomable. I have this all plotted out from the T&As actual bills. This evidence is necessary but is suppressed in what investigators seized from my home legal office 13½ years ago that i've since not been able to access. It is shocking that my trial lawyer didn't introduce the Bankruptcy expert's report or even argue this or try for the evidence.

8. At page 3 line 10 re: Cordell's perjury to get the job of SPECIAL COUNSEL TO THE BANKRUPTCY TRUSTEE that she used to commit more frauds to loot the estate which provably is the only reason Thompson didn't get paid.

Cordell lied in her declaration that she submitted to try to be appointed as SPECIAL COUNSEL...that "The Thompson judgment debt has no conflicts with any of the general unsecured creditors"

What she means there is that she represented that the Thompson debt was not also a secured creditor. If the Thompson debt was in any way secured, then it had a conflict with the general unsecured creditors. That is because a secured creditor gets paid before the general unsecureds, taking funds out of the common "pot" which will be left to divide among the general unsecured creditors in proportion to the size of their debt.

The lie, and the problem was that the Thompson debt did hold a secured position against an asset called Edgemont Ranch/Rancho Durango Ltd., a real estate investment in Durango, Colorado in which I had invested. Evidence proves this.

But the fraud didn't stop there. When the trustee sold that asset, all the funds were paid to the Thompson attorneys, it appears without any notice to or approval by the Bankruptcy Court. That notice to and approval of the Bankruptcy Court is strictly required so that other creditors are aware of the sale, and if they wish to bid more they can.

Since I had invested over \$200,000 in that asset, and the trustee sold it for just \$10,000, a 95% discount, it is reasonable to assume that another creditor may have wished to bid more, had they been made aware of the sale AS THE LAW REQUIRES.<sup>A</sup>

It still gets worse, the trustee gets 3% of all the funds he distributes, and the trustee's lawyer spend hours on this transaction, hours that he charged hundreds of dollars an hour for. These fees/costs should have been paid out of the \$10,000 income.

It seems the Thompson lawyers got every bit of the \$10,000, saddling the other general unsecured creditors with the 3% and the lawyers' fees, including fees that were paid to the Thompson lawyers!

That is far from the worse fraud by the T&As. Personal trustee Robert Mosier repeatedly, intentionally sent the incorrect amount to IRS and then got a refund on the, if I recall correctly, and I feel I do, about \$300,000. Mosier improperly took his 3% again each time he sent it to the IRS. That cost the real creditors about \$9,000 per "pop," (3% X \$300,000, each time!).<sup>A</sup>

The frauds in the Bankruptcy that kept Thompson from being paid are never ending. But, i'm not doing very well at being brief so I go on here.

There is yet another HUGE FRAUD ON THE BANKRUPTCY COURT AND OTHER CREDITORS by Dolores Cordell, the D.A.'s "#1 witness" in the murder trial, and her employer Colleen Campbell who caused my wrongful prosecution.

Campbell agreed in document #133 in the SA-86-06166-JR Bankruptcy to "indemnify" the Bankruptcy estate, essentially the other creditors, for any damages done to them as a result of Cordell's appointment as SPECIAL COUNSEL...

Evidence that is suppressed will prove Cordell lost creditors \$2,000,000+. I submit this is another reason that Campbell wanted me in prison, falsely.

A) Because so many Bankruptcy files are suppressed, just perhaps something was done on these issues about which i'm not aware. I'm 99% sure i'm right on these issues.



9. Page 3 line 16, re: Dolores Cordell's perjuries in the murder proceedings.

Evidence conclusively proves (I'm finally going to quit saying that, since everything I claim, unless I clearly equivocate, is 100% provable).

Cordell committed 54+ material perjuries between the Los Angeles case and the Orange County Grand Jury. Many of them are outrageously prejudicial.

Some of her testimony under oath at the Grand Jury in 2001 was contradicted completely, 180°, by her testimony in Los Angeles, or obviously vice versa. Yes, key testimony by Cordell was mutually exclusive.

I've briefed all of her perjuries, citing ironclad evidence proving her felony perjuries. I've sent that to the prosecution more than once. Law rules that they must notify the Court when they become aware of perjury or even false testimony, GIGLIO V. U.S. (1972) 405 U.S. 150, 154-155, many others.

But the D.A. and attorney general's office both have ignored their legal obligation. (Other law includes in re JACKSON (1992) 3 Cal 4th 578, 597)

This should perhaps be no surprise since the attorney general's representative, lawyer Louis Karlin, lied materially in his reply brief to our direct appeal, dozens of times, possibly over 100. I am briefing those, and there are some whoppers where he lied even about what his own witnesses testified to. Karlin blatantly LIED about several very material issues.

We need to be cognizant that even one material instance of perjury\* that prejudices the defendant requires reversal of the conviction. See Penal Code § 1473(b)(1) and extensive authority. \*(Even just false testimony reverses.)

Reversal is virtually automatic when it can be shown that any member of the prosecution team was aware of false testimony, JACKSON V. BROWN (9th Cir. 2008) 513 F.3d 1057, 1075-1076.

Here "members of the prosecution team" committed false testimony, if not perjury, 36 times in the Los Angeles proceedings. That is 17 for Lillienfeld and another 19+ in offers-of-proof by the DDAs. These are in addition to evidence proving that they were aware that Cordell and other witnesses testified falsely. The DDAs and Lillienfeld had evidence proving they testified falsely.

10. These arguments without support in the evidence are Sixth Amendment constitutional violations requiring reversal. That is because they are termed "Testimony not subject to cross-examination by the prosecutors," citations.

11. It is also illegal for lawyers to misstate the law. It is prosecutorial misconduct to do so. See People v. BOYETTE (2002) 29 Cal 4th 381, 435, People v. MENDOZA (2007) 42 Cal 4th 686, 702, People v. KATZENBERGER (2010) 178 Cal App 4th 1260, 1266, U.S. v. ARTUS (9th Cir 1976) 591 F.2d 526, 528 and others.

Worse, Judge Schwartz is charged with the obligation to insure that the correct law and facts get presented to the Jury. She failed miserably there. With a case as complex as this re: Bankruptcy law, that is very hard to follow, even as an attorney (DDA Dixon admitted this in his close) it was fatal to the defense for the Jury not to be given the correct law in Jury instructions. That problem was exacerbated by the prosecutors grossly misstating the law.

12. Page 3 line 36, re: Black vs. white shooters. No evidence supported black shooters. All evidence re: the actual crime scene proved white shooter(s), e.g. bp 000188, an eyewitness' 911 call, and trial testimony, 16 RT 6063, but this was not explained to the Jury. We have a package of over 50 pages, primarily evidence, which proves white shooters. I was convicted on the speculation that 2 blacks seen on bicycles 2½ miles away were the escaping killers. End

- 1) Govt. Code 3108, his oath of office, states this is perjury. Case law agrees.

SOME OF THE NUMBERS IN THIS DECLARATION MAY VARY SLIGHTLY FROM CORRESPONDING NUMBERS YOU MAY SEE IN PRIOR DOCUMENTS.

THAT IS BECAUSE AS TIME GOES BY AND MORE EVIDENCE PLUS LEGAL RESEARCH BECOMES AVAILABLE TO US, WE VERIFY NEW ISSUES, AND/OR FIND NEW ISSUES.

FOR EXAMPLE FOR PERJURIES BY WITNESSES AT THE L.A. LIVE PROCEEDINGS HERE WE CITE 84 PERJURIES/INSTANCES OF PROVABLE FALSE TESTIMONY, IN ADDITION TO THE 17 PERJURIES WE CAN PROVE FOR LEAD DETECTIVE LILLIENFELD AT THE L.A. TRIAL.

THIS NUMBER IS HIGHER THAN WE'VE CITED BEFORE. THIS NUMBER IS PROVABLY CORRECT.

THIS DECLARATION WAS DONE ON 6/1/14 AND IS THE RESULT OF OUR LATEST RESEARCH AND VERIFICATIONS.

OTHER NUMBERS MAY SIMILARLY CHANGE, SOMETIMES GOING DOWN (NOT OFTEN) BECAUSE OF A DIFFERENT INTERPRETATION OF THE LAW THAT HAS COME TO OUR ATTENTION, OR A MISTAKE WE REALIZED.

GENERALLY HOWEVER THE NUMBERS INCREASE AS WE OBTAIN ACCESS TO MORE EVIDENCE.

I DO ABSOLUTELY GUARANTEE THAT EVIDENCE WILL PROVE 400+ FALSEHOODS/LIES IN THE PROCEEDINGS VS. ME.